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Paris, 10th October 2015

Subject : Application to exempt n°29 of crystal glass a part of the directive ROHS 69/493/EEC

Dear Sir,

You are in charge of conducting, in the name of the European Commission, a public consultation concerning the request formulated by European Domestic Glass and Lighting Europe in the context of the RoHS (Restriction of Hazardous Substances) directive.

This public consultation aims at obtaining the positions of the stakeholders. As a French Senator from Lorraine, which is the cradle of crystal industry in France, I wish to participate in the consultation.

I do support the exemption of crystal in the context of the future RoHS. Four main reasons justify my position.

First, lead oxide has no substitute. Thorough and documented research over two decades did not lead yet to a substitute to lead oxide which remains an essential constituent to crystal, as recognized by Directive 69/493/EEC. Moreover, the industrial use of lead oxide is heavily regulated at EU level with regard to environment and human health.

Second, banning the use of Lead would have no environment impact. Landfilling of those prestigious items is highly unlikely : they are kept, transferred, inherited or resold. Crystal manufacturers provide inherent assistance via an after-sales service by which they collect and replace the broken parts of crystal parts of electric luminaires. In addition, there are second-hand shops and specialized repair workshops, privately collecting, repairing and replacing spare parts of crystal glass electric applications. The applicants have produced the results of leaching tests. Those tests



demonstrate that crystal is classified as non-hazardous waste according to criteria from Council Decision 2003/33/EC, including in relation to lead leaching.

Third, if the renewal is not granted, the existence of crystal manufacturers would be threatened as Chandeliers, floor and table lamps, luminaires and candelabras represent 1/3 of their turnover. It would be a cultural and economical disaster for France and Lorraine. I must put the stress on the fact that all manufacturers have been granted a State label « Entreprises du Patrimoine Vivant" (Living Heritage Companies) put in place to reward French firms for the excellence of their traditional manufacturing skills.

Fourth, around 1 600 direct jobs in France, 6 000 in Europe would be endangered. We cannot accept such a perspective in a Region already deeply affected by a long term crisis.

I give my full support to the request of the petitioner and thank you in advance for the kind attention to these elements.

Bien sûr

Philippe LEROY