

Consultation Exemption No. 6c (renewal request)

Exemption for « Copper alloy containing up to 4 % lead by weight »

Francéclat is the French Watch, Clock, Jewellery, Silverware, Tableware Committee.

We would like to participate in the ongoing stakeholder consultation to support the request for the renewal of Exemption 6c for copper alloys containing up to 4 % lead by weight due to the importance of the use of leaded copper alloys in the watchmaking industry.

We agree with the applicant's proposal to renew the exemption with the same wording.

We participated in the previous consultation in 2015 concerning the renewal of this exemption in order to provide information on the use of leaded copper alloys in watchmaking for the manufacture of the parts constituting the regulating organ of quartz watches, namely the movement.

An electronic watch movement is a complex structure of a great number of small and extremely small parts with tolerances in the micro-range. In some cases, components with a diameter of only 0.07 mm and with lengths of 0.3 mm that have to fulfil tolerances of +/- 2 µm or even +/- 1 µm are used. These parts are machined and then shaped and only brasses containing around 3 % lead can guarantee the high level of performance required for their manufacture.

The assembled watch movement is then inserted into the watchcase which protects the movement hermetically against dust, humidity and shocks.

We support the renewal request because we are still unaware of the existence of an alloy which would be a viable alternative to leaded copper alloys currently used in the watchmaking industry: major difficulties were encountered during machining of the driving and regulating parts, e.g. the dimensions, tolerances and surface quality requirements are not met. The absence of equivalent quality for these parts has a negative impact on the primary functions of a watch, namely the precise time measuring function and the service life. Moreover, potential alternative materials currently don't meet other manufacturing criteria such as the productivity, the tool life, the energy consumption and therefore generate additional production costs in an already severe context of competition with countries where labour costs are low.

From an environmental point of view, the movements of quartz watches are easily and completely removable and recyclable. Moreover, watches are a special product because its owner has a relationship with this product that goes far beyond its mere use value: even when the watch is no longer worn, the consumer tends to keep it. Watches are durable objects which have heritage and sentimental value and which are never thrown away. This greatly reduces the release of lead into the environment.

The withdrawal of this exemption would have a significant impact on the watch industry in the absence of technically and economically satisfactory substitutes. We therefore strongly support the filed renewal request.