



INSTITUT
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D'ART



Le Président
INMA n°23560

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Paris, June 3, 2021

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

Dear Sir,

You have been tasked with conducting, in the name of the European Commission, a public consultation concerning the waiver request elaborated 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 with regard to the arguments put forward by the professionals in their initial submission, supplemented by the replies addressed to you in response to a series of additional questions.

The Institut National des Métiers d'Art (INMA), an association of general interest and public utility under the aegis of the Ministry of the Economy, Finance and Recovery, the Ministry of Culture and the Ministry of National Education, Youth and Sports, conducts a policy of support for the artistic crafts as well as for Living Heritage Companies. It conducts actions at the national level in response to all of their challenges: public information, monitoring of the sector and its promotion, monitoring of training, economic development and transmission of know-how. It advises national organizations as well as territorial actors in the management of projects.

Artistic crafts benefit in France of a national policy. They are listed in a decree signed by the ministries of Economy and Culture. This list includes trades that have common characteristics: the manufacture of durable, repairable, high value-added objects based on centuries-old know-how. It includes, among other, the know-how of the crystal manufacturers and the manufacture of organ.

We wish to inform you of our analysis of the arguments of the petitioners - whose initiative has our support - insisting on three factors:

1/ The addition of lead oxide as a means of forming a new substance called "crystal" makes it possible to produce specific items that it would otherwise be impossible to create:

- The addition of lead oxide increases the viscosity of the material and increases the duration of its working time, thereby allowing the elaboration of objects that could not be obtained with standard glass, such as branches of chandeliers and other shapes;
- The addition of lead oxide also results in brighter and more sparkling items (due to the refractive, dispersion and transmission indices) that cannot be obtained with standard glass;
- Lastly, lead crystal displays lower hardness than conventional glass, which allows finer and more precise cutting and engraving of the items.

2/ As with organ pipes, and after two decades of research, no substitute for lead oxide has been found that would result in the same properties.

3/ As with organ, from an environmental point of view, the impact of using electrical items containing crystal parts is virtually zero:

- Items made in crystal are unique, prestigious luxury objects that are kept, passed on from one generation to the next, and can be restored when damaged. There are craftsmen who are specialised in the repair of such works;
- Consequently, the volume of crystal items that end up on waste disposal sites is negligible.

In this context, crystal lighting fixtures, especially chandeliers, centre lights, candelabras and the like, which have made the reputation of our crystal manufacturers, are high added value products. A decision not to renew the exemption would reduce the turnover of French crystal manufacturers by nearly one third. In the current economic context, the manufacturers would not survive such a situation.

The INMA therefore gives its full and utter support to the request of the petitioner.

Yours sincerely,



Luc LESÉNÉCAL