



MINISTRY OF INDUSTRY AND TRADE
OF THE CZECH REPUBLIC

Eduard Muřický
Deputy Minister

Prague June 8th 2021
No. MPO 515200/2021

Dear Madam,

on behalf of the Ministry of Industry and Trade of the Czech Republic, the national authority on **restriction of hazardous substances in electrical and electronic equipment** I would like to **express my full support for renewal request No. 29 „Lead bound in crystal glass as defined in Annex I (Categories 1, 2, 3 and 4) of Council Directive 69/493/EEC” submitted by European Domestic Glass association and Lighting Europe association on December 20th 2020 and for granting the maximum possible duration.**

Lead crystal glass items are mainly hand crafted, even if some parts could be industrially processed. For all these products the transparency and spinning effect/rainbow effect and design are the major required function. These glass items must have a high optical dispersion to fulfil their function. High dispersion can only be obtained by adding lead to the glass formulation. Electric equipments made of lead bound crystal are high end, prestigious and expensive products, they are kept and repaired if needed. Any landfilling of those prestigious and expensive items is highly unlikely. Today, on the basis of current knowledge, there is no alternative to lead oxide in the crystal starting composition. Lead oxide is the one and only known oxide that allows to achieve exceptional workability and relevant technical properties. In consequence of this, it is impossible to meet several objectives of the Directive 2011/65/EU (“RoHS 2 Directive”) that are preconceived in its preamble. In general, in the case of electrical or electronic equipment containing lead bound in crystal glass, altogether six articles of the preamble out of total thirty cannot be applied. This includes articles: 2, 4, 7, 8, 13, and 30. The restriction rules of the use of certain dangerous substances in electric and electronic devices aim to contribute to the mitigation of problems at the end of the life cycle, when electric devices are treated as an end of life product or waste (in the collection, but in particular in the recovery and disposal). **In the case of equipment with lead bound in crystal glass, fulfilment of that interest cannot be ensured for objective reasons.**

In conclusion, I would like to point out that electric or electronic equipment containing lead bound in crystal glass belong to certain niche product groups which should be excluded from the scope of RoHS 2 Directive as their inclusion would bring negligible environmental or health benefits and introduce

unresolvable compliance problems or market distortions that cannot be addressed effectively through the exemption mechanism provided for in that Directive. Traditional production supporting the craft heritage of European nations in its unique complexity should be certainly beyond the objective of phasing-out of hazardous substances in EEE.

Yours sincerely,

A handwritten signature in blue ink, consisting of a stylized 'ofo' followed by a large, sweeping flourish that ends in a hook.

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