



ASSOCIATION OF THE GLASS AND CERAMIC INDUSTRY OF THE CZECH REPUBLIC

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Subject: Application for removal of lead crystal glass in accordance with Directive 2011/65 / EU (RoHS 2); Annex III, 29 - Lead bound in crystal glass as defined in the Annex I (Categories 1, 2, 3 and 4) of Council Directive 69/493 / EEC

Dear Ladies and Gentlemen,

The Association of Glass and Ceramic Industry of the Czech Republic is a union of producers of flat, packaging, technical and utility glass, glass and mineral fibres, utility porcelain and sanitary ceramics, trade organizations, manufacturers of machines, technological equipment and service organizations, vocational schools. The Association's activities are focused on the support, promotion and advocacy of the glass and ceramic industry.

The Association defends the interests of glass producers and supports their efforts, also in the development. This all, of course, under the requirements of the long-term sustainable development of the sector. That is why we are turning to you with a request for support for obtaining an exemption for crystal glass manufacturers.

On the 20th December 2020, the EDG (European Domestic Glass) submitted a request to renew exception 29 (Lead bound in crystal glass as defined in Directive 69/493 / EEC cat. 1, 2, 3, 4), which has been valid for ten years and focused on crystal glass used for electrical and electronic devices. The Association of Glass and Ceramic Industry of the Czech Republic supports the granting of the exception. If the European Union didn't grant the exception for the use of lead tied to the production of crystal glass for lighting and other electric applications (chandeliers, lamps, clocks, digital photo frames lighting bricks etc.), this sector of the glass industry could be seriously damaged or could disappear.

We are turning to you with a request to maintain this exception for another period. The association agrees with the European Commission and is aware of the need to implement hygiene measures leading to the improvement of public health according to the rules of REACH (Registration Evaluation



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Authorization and Restriction of Chemicals) and the directive RoHS (Restriction of Hazardous Substances Directive).

With all this in mind, these rules need to be used wisely. The use of crystal glass as part of electrical and electronic devices is not dangerous. Despite all the efforts of manufacturers to find alternative solutions, there is no substitute for lead oxide in the production of crystal glass. We should also note that only very few crystal products are discarded. These products are considered luxury goods.

We can proudly say that crystal production in the Czech Republic is a traditional field with a centuries-old tradition and local companies are among the world's leading manufacturers. At the same time, it should be noted that the glass industry in the Czech Republic employs over 18,500 workers, of which over 10,000 are in the production of utility and other types of glass and others in related fields and services. We should also point out that the glass industry is located mostly in areas with higher unemployment. It is people who create this economic activity in the regions and are the bearers of cultural heritage.

If the mentioned European directive is applied recklessly, without exception for lead in glass, there is a risk of difficulties for producers in the Czech Republic and Europe. It would be liquidating for many of these companies. In this context, many jobs are at risk, as are the social, economic and cultural benefits that producers bring to their regions.

Again, it is important to mention:

- There is no alternative to lead within the chemical composition of crystal glass while maintaining its specific properties.
- According to current standards, the use of crystal glass does not affect human health.
- Within the set standards, it does not pose a danger to the environment.
- High risk of job loss in regions with high unemployment.
- There is the disappearance of traditional manufacturers and relocation of production outside the European Union.

For all the reasons above, the Association of the Glass and Ceramic Industry of the Czech Republic fully supports the requirement of manufacturers to keep the exception and extend it for ten years or more.

Ladies and gentlemen, I hope that you will support maintaining this exception for years to come.

Best Regards



Ing. Petr Mazzolini
president
Association of Glass and
Ceramic Industry of the Czech Republic