



Sarrebourg, 14th October 2015

Téléphone :
03 87 03 24 28
Fax :
03 87 03 75 05
Mél :
ce.0570095@ac-nancy-metz.fr

22, rue de la Mésange
57403 SARREBOURG

Oeko-Institut e.V.
Institute for Applied Ecology
Postfach 17 71
79017 Freiburg

rohs.exemptions@oeko.de

Dear Madam, Dear Sir,

The Technical College Labroise wishes to submit its views on the exemption renewal request for "lead bound in crystal glass", in the framework of the ROHS.

As a professional school specialized in glass and crystal artefacts, we support the European Commission wish to adopt measures aiming a reducing the use of dangerous substances such as lead, in order to limit to the biggest extent their impact on human health and environment.

However, it would be a serious error to ban the use of lead oxide as a constituent in crystal, as the technical and scientific progress to not allow so far to obtain the same characteristics (refraction, sonority, and compatibility with metallic oxides) by using other materials. Moreover, the tenderness of the crystal material would be compromised and would trigger an alternation of the cold working.

Besides, the use of lead oxide as a crystal constituent allows to lower the melting temperature and therefore provides an important economy in terms of energy.

Symbole of the French know-how and savoir-vivre, crystal, present in table arts sector, is a national asset benefitting from an important economic weight and which triggers employment in our geographic area. To abandon crystal work would be to put at stake a traditional know-how which made the reputation of manufactures in Lorraine.

Often considered as a fine art, crystal items participate in the French patrimoine and are transmitted over generations. They only exceptionally end as discarded waste. In any way, crystal material is inert in solid state and cannot, in any instance, bring environmental pollution.

On the basis of these arguments, the Technical College Labroise supports the exemption renewal request for crystal articles in the framework of the directive ROHS, introduced by the European Domestic Glass Association.

Yours Sincerely,

The Headmaster
F. VIGNOLA

