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*Paris, 30<sup>th</sup> September 2015*

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 formulated 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 file, supplemented by the replies addressed to you in response to a series of additional questions.

The CFMA (Confédération française des métiers d'art, de l'excellence et du luxe - French Confederation of Arts and Crafts) is a professional organization founded in 1947. Represented on the Commission of Living Heritage Companies (Entreprises du Patrimoine Vivant) and the "arts and crafts" commission of the French Education Board, it is recognised for its expertise and its knowledge of arts and crafts in France.

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/ After two decades of research, no substitute for lead oxide has been found that would result in the same properties. The training and scientific analysis centres we have consulted have confirmed this point.

3/ 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 CFMA therefore gives its full and utter support to the request of the petitioner.

Yours sincerely,



**Philippe Andrieux**  
*Chairman*