

Le Président

Metz, le **14 OCT. 2015**

DDE/Management DDE/Courriers/ Fédération des Cristalleries

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Dear Sir,

Moselle Department Council supports the renewal request for exemptions concerning the Directive on Restriction of Hazardous Substances, which notably restricts the use of lead (Pb) in the manufacture of various types of electronic and electrical equipment (EEE), including lighting equipment.

As a matter of fact, Moselle is very involved in crystal manufacturing as the territory concentrates 25% of French cristallery employment (1 600 direct jobs in France). Should the renewal not be granted, the existence of crystal manufactures would be at stake as some manufactures already weakened by the economic crisis would thus disappear. Indeed, the production of electric chandeliers, floor and table lamps, luminaires and candelabras in Moselle represent one third of the national market turnover.

Because crystal manufactures are located outside the major employment areas, they really represent the only economic lungs of their fields of activity.

In Moselle, three sites are particularly concerned, Meisenthal, Vallérysthal and Saint-Louis-lès-Bitche, which belong to the most prestigious glass and crystal manufactures (20 000 visitors for "La Grande Place" museum in Saint-Louis). Without the exemptions prolongation, branding and identity, considered as added value for our territory, could be completely lost.

In terms of risks to the environment, the applicants have produced results of leaching tests. These tests demonstrate that crystal is classified as non-hazardous waste according to criteria from Council Decision 2003/33/EC, including with regard to Pb leaching.

Besides, thorough and documented research over two decades have not yet led to a substitute to Pb oxide which remains an essential constituent of the crystal.

Moreover, there is no mass production as each part is either a unique creation or issued in a limited edition. For example, the total production of electric chandeliers is slightly above one thousand parts per year in Europe.

At least, these prestigious items are preserved, transmitted, inherited or resold. Most crystal manufactures provide inherent assistance via an after-sales service through which they collect and replace the broken parts of crystal electric luminaires. In addition, there are retail and specialized repair shops, privately collecting, repairing and replacing spare parts for crystal glass electric applications. Therefore, the latter are not meant to be rejected.

If Moselle Department Council subscribes to the sanitary measures coordinated by the European Commission and liable to improve health of populations regarding use of metals such as lead, I wish that in view of the elements above expressed, the European exemption granted in June, 2011 could be renewed for crystal components entering the composition of electric and electronic equipment.

For all these reasons, be assured that I strongly support the renewal request as I intend to preserve employment and know-how in Moselle.

Respectfully,



Patrick WEITEN