



Prague October 16th, 2015

No. MPO 49449/15/31200/31000

Dear Sir,

as Vice-minister of the Ministry of Industry and Trade of the Czech Republic, managing the Section of Industry, I wish to participate in the ongoing public consultation process concerning **the exemption No. 29: Lead bound in crystal glass as defined in Directive 69/493/EEC**. The Ministry of Industry and Trade of the Czech Republic is at the same time the national authority on restriction of hazardous substances in electrical and electronic equipment.

Let me express my full support for renewal request submitted by European Domestic Glass association on January 16th, 2015 and for granting the maximum possible duration.

There are already a lot of very well founded and qualified reasons in favor to renew validity or even to define the permanent exception of RoHS 2 regulation. Chandelier, floor lamps, candelabras, table lamps, wall sconces, luminaires are made in crystal glass: those lead crystal glass items are mainly hand crafted even if some parts could be industrially processed. For all these products the transparency and shining effect / rainbow effect and design are the major required functions. All above mentioned articles made of lead bound in crystal are high end, prestigious and expensive products mostly stemming from artisanal work requiring unique and specific knowledge. There is no single element or combination of elements known to substitute lead oxides in crystal glass in all its properties (workability, optical properties, chemical resistance, etc.).

I would like to draw your attention to socio-economic aspects of lead crystal glass production in the Czech Republic. Crystal glass containing lead oxides is a traditional material, which is being produced in our region since the 18th century. This type of glass has been also progressively used for decorative purposes on

electrical and electronic equipment. Unique combinations of processing and optical/decorative properties and characteristics allow the manufacture of EEE articles which could not be produced otherwise. The fame of Czech glass production become worldwide recognized. The production of crystal glass has been therefore due its unique combination of artisanal and industrial know-how of excellence recognized and protected by Industrial Property Office of the Czech Republic and by World Intellectual Property Organization as Protected Designation of Origin under the name "Bohemia Crystal (Cristal de Boheme)" since the year 1968. There are 18 crystal glass manufacturing companies in the Czech Republic, 8 of them are considered as SMEs. Considerable part of the product portfolio of these companies are used in electrical equipment therefore the ban of use of lead oxides would cause severe damage not only to affected companies but to the whole regions (namely districts Jablonec nad Nisou, Česká Lípa and Nymburk). Crystal manufacturing companies are not only industrial stakeholders, but also important players on the level of their social responsible activities within regional communities. Unemployment, loss of centuries transmitted knowledge, loss of competitiveness, social despair are in this case examples of much higher real risks than the environmental one.

Last but not least I would like to raise the phenomenon of synergy effects on glass industry. First, the glass industry falls under the ETS and all its sectors are considered to be exposed to risk of carbon leakage. Recent quantitative assessment carried out by the European Commission shows an increase progress in the risk of carbon leakage. Second, the application of BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions for the manufacture of glass concerning permit conditions by the end of February 2016 is another factor. These examples of current demanding measures should also be taken into account, because glass industry at whole Europe is suffering not only due economic downturn.

Yours sincerely,



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