



Standing Committee of the European Glass Industries
Comité Permanent des Industries du Verre Européennes

Brussels, 31 March 2008.

Öko-Institut
RoHS Exemptions
Ms. ZANGL
Mr. GENSCH

O/Re. : 07E08/FVH/VF

Dear Ms. Zangl,
Dear Mr. Gensch,

RoHS Exemption 29 : LEAD BOUND IN CRYSTAL GLASS

In answering the questions raised by the Öko-Institut in reviewing the existing exemption (29) for lead bound in crystal glasses from Directive 2002/95/EC called "RoHS" granted by the European Commission, we would like to point out as follows:

With the Commission Decision of 12 October 2006 (L 283/47) the Commission noted in its introduction:

"(2) Crystal glass has been progressively used for decorative purposes on electrical and electronic equipment. Since Council Directive 69/493/EEC of 15 December 1969 on the approximation of the laws of the Member States relating to crystal glass prescribes the amount of lead to be present in crystal glass and the substitution of lead in crystal glass is therefore technically impracticable, the use of this hazardous substance in specific materials and components covered by that Directive is unavoidable. Those materials and components should be therefore exempted from the prohibition."

We are therefore of the opinion that the questions raised by the Öko-Institut are not correct to review whether this exemption is still justified. The only question appropriate would be therefore to question whether Directive 69/493/EEC is still in force and effect. The answer is simply yes. On that basis, exemption (29) for lead bound in crystal glass should be further exempted without any restrictions.

Yours sincerely,

F. VAN HOUTE,
Secretary-General.