

## Comments on ECHA's Draft 11th Recommendation for Lead (EC number: 231-100-4) and references to responses

*The present document compiles the comments received during the consultation on the draft 11th recommendation for inclusion of substances in Annex XIV of REACH for Lead (EC number: 231-100-4). The consultation took place between 2 February 2022 and 2 May 2022.*

*For each of the comments there is also a reference to specific section(s) of a document containing the responses to comments ("Response document", available at the substance specific entry of the list of Recommendations for inclusion in the Authorisation List (<https://echa.europa.eu/recommendations-for-inclusion-in-the-authorisation-list>)). The responses in the Response document are arranged by thematic block and level of information (see more detailed explanations at the beginning of that document).*

### PUBLIC VERSION

## I - General comments on the recommendation to include the substance in Annex XIV

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
3577 2022/02/02	Dr. Fischer Group, Company, Germany	We strongly oppose to the plan of including lead into Annex XIV. We need lead solder as a key material to produce about half of our portfolio. We cannot assess the risk of one of our key material to be liable to registration. There is no real alternative material available. The only possible alternative would require to change production processes profoundly. Also, most of the affected products would need to be re-qualified by our customers for their applications. The cost and the time this would take, time without being able to deliver products, would cause substantial economic problems for us. Lead solder has been used for decades for our purpose, production of special incandescent nad halogen lamps, and will be needed for that special purpose for many more years.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3578 2022/02/23	CIMAP, Company, France	No lead is used or found in our products at all	Thank you for the information provided

3579 2022/03/15	USIPLAST COMPOSITES, Company, France	Notre activité, nos produits ne sont pas concerné. Nos partenaires sont conformes à la réglementation pour les semis produits. Les éléments utilisés ne présente pas de trace de plomb.	Thank you for the information provided
3580 2022/03/16	Individual, France	As a stained glass artist, lead is a primary material necessary to the realization of this art. Stained glass art has existed for centuries and forms part of the European patrimony. Stained glass artists are trained and equipped to reduce the risks of lead contamination through proper PPE, disposal of lead scraps, and regular blood testing. With these measures and the modern PPE available today, the risk of contamination of stained glass artists is low, as the commission is certainly aware. Therefore, a blanket ban on lead would be a fatal measure to this important sector. In my case, I would be obliged to stop my nascent stained glass enterprise, which has been benefitting from European small business initiatives. I implore the commission to refine the proposed lead measures in order to save the stained glass sector.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b>
3581 2022/03/29	MARPOSS S.P.A., Company, Italy	Good morning,  we contact you regarding the proposal for the inclusion of Lead in Annex XIV. Our company does not produce lead-containing raw materials, but uses these materials in its mechanical designs. For us it is necessary to maintain the presence of lead at the current values in the materials used (mainly: steels containing lead, brasses, bronzes and aluminums containing lead) for the following reasons:  <ul style="list-style-type: none"> <li>• Lead makes the "machinability" of these materials possible in order to obtain the required geometric shapes that otherwise cannot be manufactured with current technologies.</li> <li>• The presence of lead in the materials we use, guarantees that there is no production of marks or scratches on components that come into direct contact by sliding with parts owned by our customers. Failure to achieve this goal results in a lack of functionality of our products.</li> <li>• The presence of lead also guarantees us the absence of seizure phenomena of the moving parts of our products.</li> </ul>	<b>A.1.5.3. Use specific considerations</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>

		Best Regards Marposs Chemicals Technical Committee	
3583 2022/04/13	European Semiconductor Industry Association (ESIA), Industry or trade association, Belgium	<p>The semiconductor industry does not have this information on other sectors. The European semiconductor industry is a provider of key enabling technologies and creates innovative solutions for industrial development, by contributing to economic growth and responding to major societal challenges. Being ranked as one of the most R&amp;D intensive sectors by the European Commission, the European semiconductor ecosystem supports approximately 200,000 jobs directly and up to 1,000,000 induced in systems, applications, and services in Europe. Overall, micro- and nano-electronics enable the generation of at least 10% of GDP in Europe and the world.</p> <p>Semiconductor device fabrication is among the most complex and sophisticated manufacturing processes in the world, taking place in a strictly controlled and safe production environment (the cleanroom). All manufacturing processes are performed in dedicated and closed process equipment tools. Here the presence of uncontrolled particles, as well as impurities in the form of chemical vapours and gases constitutes an unacceptable risk from a safety and health as well as from a production quality viewpoint.</p> <p>Lead in metal form is used in limited quantities as an essential solder alloy in some semiconductors to meet the technical functionalities required of the respective semiconductors (microchip) and their performance applications. Generally, semiconductors are essential for electronic systems in many industry sectors (including e.g., lighting, intelligent transport systems, automotive, aviation, aerospace, smart grids, renewable energy technologies, industrial tools, agriculture, computing, healthcare and medical devices, consumer electronics, encryption security and smart cards). For the production of many semiconductors that are used in these fields applications, lead is necessary to provide significant environmental benefits in the final sector application.</p> <p>Lead exposure is already highly regulated in the EU through substance-specific legislation covering many sectors and products including manufacture, use and end-of-life/waste (Batteries Directive, RoHS Directive, Directive on end-of-life vehicles, OHS legislation, Industrial Emissions Directive, Air Quality Standards, Ambient Air Quality Directive, the Water Framework Directive, the Waste Framework Directive, and the Toy Safety Directive).</p> <p>If lead was introduced in Annex XIV of the REACH Regulation, R&amp;D in the semiconductor sector could no longer be conducted in the EU. Moreover, production of semiconductors would only be possible relying on authorisation of an appropriate duration. Given that there is no replacement for lead in the semiconductor industry, authorization does not constitute a viable long-term option, since it is limited in time. Given that most suppliers of lead are located outside the EU, it will be on the semiconductor producers to apply for authorization. This constitutes an excessive administrative burden. In light of this, ESIA believes that lead should not be included in Annex</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b></p> <p><b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b></p>

		<p>XIV of the REACH Regulation.</p> <p>ESIA would support revising the existing EU binding occupational exposure limits and that this should be done by implementing the recent update of the Chemical Agents Directive. ESIA would suggest that lead is better regulated and managed through targeted REACH restriction for sectors where lead exposure and content may be deemed a risk, in combination with updating the existing binding occupational and biological exposure limits.</p>	<p><b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
3584 2022/04/14	GROHE AG, Company, Germany	<p>Lead is being proposed for inclusion into the Candidate list for authorisation due to its classification for reproductive toxicity. We understand from the prioritisation approach that the wide dispersiveness of uses is assessed on the basis of the types of actors which are relevant for the use of the substance considering the fact that wide dispersiveness decreases from consumers to industrial uses. Furthermore, the presence in general of lead in some articles supplied for professional and consumer use increases the prioritisation level.</p> <p>GROHE, sanitary sector, lead</p> <p>GROHE is a main manufacturer of sanitary appliances such as faucets and accessories. Our use of lead relates to the processing of lead containing brass alloys in foundries in order to produce articles. Our industry sector use of lead, as a substance, is therefore limited to the industrial level (SU15) and there are no uses by professionals or consumers. While other companies in the sector could have a slightly different technical set-up, in general suppliers of sanitary equipment either have a remelting set-up where standard brass alloys are remelted and casted in the final shape or have some other process where brass is reshaped from a standard shape into the complex shape of a body of a faucet.</p> <p>Lead is present at levels between xxxxxx in our inhouse casted brass alloys depending on the type of brass alloy used. This represents a lead use in our industrial settings of maximum xxxxxx t lead/year. Compared to the lead manufactured and/or imported volumes mentioned in registration data (higher than 1,000,000 t/y. ECHA, 2021), our use represents a negligible proportion (lower than 0,02 %).</p> <p>Lead emissions</p> <p>Potential emissions during uses of alloys are considered negligible as the release may rather occur at the waste stage (Plomb et principaux composés, Ineris, 2015). However, our industry is highly based on recycling and respond to the Circular Economy objectives. For instance, GROHE relies for 85% on recycled brass. This prevents any uncontrolled release of lead since products reaching the end-of-life stage return to the production loop where environmental releases are fully controlled through the Industrial Emissions Directive which is currently under revision as</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses</b></p>

		<p>part of the European Green Deal. Further, lead emissions resulting from industrial uses in the EU have drastically decreased during the last decades. Indeed, according to the International Lead Association (ILA), the European Pollutant Release and Transfer Register (E-PRTR) data indicates, emissions of lead to air reduced by 88% while emissions to water reduced by 80% between 2007-2020.</p> <p>Workers exposure Workers exposure is controlled through workers safety legislation which is also under review:</p> <ul style="list-style-type: none"> <li>• The Chemicals Agents Directive (CAD) which is currently under revision in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027 which have set ambitious targets to further protect workers from risks at the workplace and with the objective to reach a Zero approach to work-related deaths in the EU.</li> <li>• The Carcinogens and Mutagens Directive (CMD) which has recently been amended and includes limits for inorganic lead and its compounds as well as biological limit and health surveillance measures which will reinforce the protection of workers from potential exposure to lead.</li> <li>• Furthermore, monitoring data in the GROHE foundries [from the period 2012-2021] shows a 95 percentile value of xxxxxx mg/m<sup>3</sup> on lead exposure, which is xxxxxx times lower than the current 0,15 mg/m<sup>3</sup> BOEL for lead under the CAD and xxxxxx times lower than the health surveillance measure of 0,075 mg/m<sup>3</sup> for lead above which medical surveillance is required under the revised Carcinogens and Mutagens at work Directive (CMD) (Directive (EU) 2022/431 adopted on 09 March 2022).</li> </ul> <p>We further note that the next Draft Annex XIV amendment currently under preparation (<a href="https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en</a>) addresses seven lead compounds for which the Commission is still considering appropriate to postpone its decision due to the current review of the CAD.</p> <p>Consumers exposure Finally, potential releases of lead from finished articles are not expected as these products are coated for corrosion protection avoiding all exposure of consumers to brass.</p> <p>Drinking water regulations Potential migration to drinking water is well controlled through the recently revised Drinking Water Directive which sets more stringent safety limits for lead in potable water. For lead, the revised Directive introduces a more stringent limit than the one currently recommended by WHO. More importantly, substitution whenever technically and economically feasible is addressed in the revised Directive under Article 10.3(f). The revision includes now a review mechanism that will involve ECHA and RAC and that resemble the authorisation process. ECHA is now involved in the process of setting European positive lists of authorised substances for the</p>	<p><b>outside scope of authorisation / drastic decrease of lead emissions over the last decades</b>  <b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b>  <b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b>  <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b>  <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b>  <b>B.1.3. Review periods</b>  <b>B.2.01. Request extra long LAD</b>  <b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b>  <b>B.2.03 Joined AfAs result in shorter review periods</b>  <b>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable</b></p>
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3585 2022/04/14	Fachhochschule Erfurt, Academic institution, Germany	<p>I oppose the inclusion of LEAD in Appendix XIV. The result of inclusion would be disastrous.  Reason:  The creation and preservation of cultural property is thus endangered or made impossible. In contrast, the danger of lead for creators of cultural property is negligible.</p> <p><a href="#">3585_Anschreiben_ECHA_FHE.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.1. Potential other regulatory actions</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p>

			<p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3587 2022/04/14	Charlotte Roden Stained Glass, Company, Italy	<a href="#">3587_Letter to ECHA.pdf</a>	Please see response to comment # 3585
3589 2022/04/14	Dombauhütte Köln, Other contributor, Germany	<a href="#">3589_Bleiverarbeitungseinschränkung 2.docx</a>	Please see response to comment # 3585
3590 2022/04/14	Individual, United Kingdom	<a href="#">3590_Copy of EN Sample letter stained glass and lead template letter.docx.pdf</a>	Please see response to comment # 3585
3591 2022/04/14	Cathedral Architects' Association, Academic institution, United Kingdom	<a href="#">3591_EN stained glass 01_140422.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p>

			<p><b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3592 2022/04/14	Kremer Pigmente GmbH & Co. KG, Company, Germany	Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. <a href="#">3592_ECHA_Blei_Ausnahmeregelung.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
3593 2022/04/14	The York Glaziers Trust, Company, United Kingdom	Catastrophic international impact on the creation and conservation of an ancient art form and heritage asset: stained glass. <a href="#">3593_YGT letter to ECHA.pdf</a>	Please see response to comment # 3585
3594 2022/04/14	Corpus Vitrearum National Committee Catalunya, Academic institution, Spain	Heritage <a href="#">3594_Stained glass and lead letter Catalan CV.pdf</a>	Please see response to comment # 3585
3597 2022/04/14	Individual, United States of America	Please continue to allow lead use in historical and new stained glass artwork. Lead is used safely by artists and is necessary for the preservation and continuance of this important art form.	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b></p>



			<b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3599 2022/04/15	Individual, United States of America	Lead should continue to be able to be used in stained glass work as it poses minimal risk when handled properly and taking proper precautions.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3600 2022/04/15	Individual, United States of America	Lead came is an essential part in the process of creating stained glass. While I understand the concern limited this will effect thousands of artists who depend upon lead products.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3601 2022/04/15	Individual, United States of America	Stained glass is dope	Thank you for your comment.
3602 2022/04/15	Individual, United Kingdom	I'm a glass artist working in stained glass. So it is a vitality material for my work but also the care and restoration of historical pieces.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3603 2022/04/15	Individual, Germany	I oppose the inclusion of LEAD in Appendix XIV. The result of inclusion would be disastrous for me professionally as a university lecturer. Reason: The academic training of conservators would be endangered or made impossible. On the other hand, the danger of lead for people working with cultural property is negligible, as suitable protective measures are easy to implement and are already being observed.	Please see response to comment # 3585

		<a href="#">3603_Anschreiben_ECHA_priv.pdf</a>	
3604 2022/04/15	Individual, United Kingdom	I cannot think of anything more disastrous and short sighted than passing a law that means countless works of art in the form of stained glass, leaded lights, can no longer be manufactured or possibly even displayed. It's like wiping out an extraordinary, beautiful and ancient craft and all the exquisite works that are part of it in one fell swoop. Thousands of maker's all over the world manage to work very safely with lead and have done for decades.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>
3605 2022/04/15	Individual, United States of America	Lead can be safe especially for things like stained glass installations. There's plenty of research to back it as well that it can be installed in the home/ building without posing health risks to those using the building or living in it daily. Following proper safety protocol means lead can be safe to work with.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b>
3607 2022/04/15	Individual, United States of America	It is possible to use lead safely in the Stained Glass arts. So much of our history is tucked into the windows of buildings across the world, and we will lose our power to restore that history if we lose the tools with which to do so.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3610 2022/04/15	Individual, United States of America	Hello, I'm a stained glass maker and I know from personal experience that lead can be used safely when precautions such as wearing gloves and having good ventilation are used.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b>
3612 2022/04/15	Individual, United States of America	As a stained glass artist, the restriction of the use of lead would be devastating to the trade. Lead is a major part of the creation and restoration of new and historic stained glass windows and when handle properly is completely safe for daily uses.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

			<b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3613 2022/04/15	Individual, United Kingdom	<p>The proposed EU Regulations on the Use of Lead would prevent stained glass artists and stained glass conservators from practicing their profession and thereby pose a threat to the future of our Stained Glass Patrimony</p> <p><a href="#">3613. Objection to proposed REACH restrictions on use of Lead.pdf</a></p>	Please see response to comment # 3585
3614 2022/04/15	Individual, United States of America	<p>I'm able to make a living for my family with my stained glass business that I run from home. If lead use was banned illegal it would put me out of business. I've worked very hard for years to get my business where it's at and have poured my heart and soul into it. PLEASE don't go through with the ban.</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3615 2022/04/15	Individual, United Kingdom	<p>To restrict or potentially ban lead for making stained glass windows will kill a craft that has existed for over a 1000 years, damage livelihoods, new work and the restoration of historic buildings. All practitioners are aware of the risks and provide safety facilities accordingly. Please think carefully before potentially wiping out an industry and heritage legacy. Thankyou.</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3616 2022/04/15	Individual, United States of America	<p>Lead is a primary component used in stained glass. Restriction of lead usage would detrimentally impact the construction, storage, and restoration of stained glass windows. For the purpose of</p>	

		rich cultural history and the preservation of existing glass windows across Europe, stained glass lead came should be exempted.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3620 2022/04/16	Individual, United States of America	Handled correctly lead is safe for use. Don't kill art!!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>
3621 2022/04/16	Staatliche Glasfachschule Rheinbach, Academic institution, Germany	<a href="#">3621_220414-lead-ECHA.pdf</a>	Please see response to comment # 3585
3622 2022/04/16	Individual, Germany	The use of lead in heritage conservation regarding joints of directly irrigated stone-surfaces and joints with a connection from stone to sheet metal is common since the middle ages and still important to restore original structures of (partly world) heritage buildings all over Europe.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3624 2022/04/16	Individual, Austria	Lead as apart of Art or cultural heritage- like church windows must be allowed wa	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3626 2022/04/17	Individual, United Kingdom	<a href="#">3626_ES Carta modelo sobre vidrieras y plomo.docx</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
3627 2022/04/17	Individual, United States of America	Thousands of Museums and conservators around the world already work with lead safely following established safety protocols.	

			<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b>
3628 2022/04/18	Individual, Australia	As a stained glass maker, it would be such a tragedy to blanket ban all lead. Working properly with lead is quite safe. Please consider this traditional art form!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3630 2022/04/18	Individual, Denmark	<p>Dear EHCA</p> <p>I am writing to you to oppose the complete ban on lead. I am a citizen of Denmark living in Copenhagen. I am a stained glass artist working independently and creating panels and windows for private customers and for exhibition. This ban would destroy my career, which is something I have spent so long building and training for. Stained glass is truly a heritage craft, and the techniques have not changed for centuries. I spent years mastering the skills required and am absolutely in love with the art form. A different career is not an option for me.</p> <p>Although the techniques have not changed, the awareness of the dangers have. A large part of my training focused around working with lead, and how to do so safely. I would never begin work without the correct PPE and ventilation, and do everything I can to protect myself and others around me. I have low blood lead levels so believe that all of this is enough to keep me safe.</p> <p>I worry that even if an exemption was made for the large stained glass conservation studios, that small independent artists like me would be left out. The artists working and training in stained glass now are the future of the art form, keeping it alive. A ban on lead would eradicate this. It makes me incredibly sad to think of this happening as it is something I love so much, and I know so many wonderful artists working in the EU who deserve to continue their craft.</p> <p>Stained glass is my life, and lead will always be a part of that.</p> <p>I hope you might consider my email in your decisions, and if a ban is to be enacted, to think about ways in which independent artisans might still practice, access supplies, and be able to see and exhibit work.</p> <p>Yours sincerely,</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>

		Polly Thomas-Colquhoun Stained glass artist, København	
3631 2022/04/18	Individual, Germany	<a href="#">3631_Blei.pdf</a>	Please see response to comment # 3585
3632 2022/04/18	Université de Strasbourg, Institut d'histoire de l'art, Academic institution, France	<a href="#">3632_Lettre ECHA.pdf</a>	Please see response to comment # 3585
3633 2022/04/18	Individual, United Kingdom	Lead, for the use in the manufacture and conservation of stained glass, simply has no alternative. The inclusion of lead in annex XIV would render this whole sector redundant. <a href="#">3633_REACH Annex XIV, EC Number 231-100-4.pdf</a>	Please see response to comment # 3585
3635 2022/04/19	van Heyningen and Haward Architects LLP, Company, United Kingdom	We are architects involved in the conservation and reuse of historic buildings.  Making sheet lead, and thus the fabrication and working of sheet lead by the building trades, subject to the ECHA control methodology would force many skilled artisans (who are normally skilled and often self- employed) out of this work, and would add huge bureaucratic costs to such work. On both accounts this would be harmful to the maintenance and repair of historic buildings, especially to roofs - which are fundamental - and a threat to our cultural heritage.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3636 2022/04/19	Individual, Germany	<a href="#">3636_Protest Bleiverbot.pdf</a>	Please see response to comment # 3585
3638 2022/04/19	Gustav van Treeck GmbH, Company, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3639 2022/04/19	Serpentino Stained Glass, Inc., Company,	<a href="#">3639_ECHA .docx</a>	

	United States of America		Please see response to comment # 3585
3640 2022/04/19	Individual, Germany	Die höchst multifunktionale Verwendung von Bleiprodukten im Bauwesen und der relativ geringe Anteil an der Gesamtverbrauchsmenge spricht für eine generelle Ausnahme von Blei in dieser Sparte von der Beschränkung.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3641 2022/04/19	US Committee of the Corpus Vitrearum Medii Aevi (CVMA), Academic institution, United States of America	Please see our attached letter, below. <a href="#">3641_Corpus Vitrearum US appeal for the exclusion of lead in stained-glass windows.pdf</a>	Please see response to comment # 3585
3642 2022/04/19	Tobit Curteis Associates LLP, Company, United Kingdom	<a href="#">3642_ECHA 01 REACH ANNEX XIV, EC NUMBER 231-100-4.pdf</a>	Please see response to comment # 3585
3643 2022/04/19	Individual, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3644 2022/04/19	Individual, Germany	<a href="#">3644_Musterbrief zur freien Verwendung_Aenderung.docx</a>	Please see response to comment # 3585
3645 2022/04/19	Individual, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3646 2022/04/20	Craft Industries vof, Company,	Beste, we zijn niet met heel veel in dit land, maar ik ben één van de mensen die haar brood verdient met het nieuw ontwerpen en vervaardigen én het restaureren van glas-in-loodramen.	

	Belgium	Het materiaal lood speelt hier uiteraard een cruciale rol. Ik maakte de laatste drie jaren heel veel creaties met glas én lood. Spijtig genoeg is er nog geen waardig alternatief voor lood, die dezelfde eigenschappen bevat qua het gemakkelijk verwerken van het materiaal. Het zou zonde zijn, dat dit ambacht niet meer kan uitgevoerd worden door het loodverbod. Dank u wel om hier rekening mee te houden in uw beslissingen. Met vriendelijke groeten Veerle Verschooren ( <a href="http://www.veerleverschooren.be">www.veerleverschooren.be</a> )	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3647 2022/04/20	Individual, Belgium	<a href="#">3647 Voorbeeldbrief aan ECHA Europese commissie 2.docx</a>	Please see response to comment # 3585
3648 2022/04/20	Individual, Belgium	Voorzie een afwijking op kunst/ glas in lood en Tiffany producten	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3649 2022/04/20	Individual, Belgium	a centuries old art form is bound to disappear if lead is restricted in stained glass	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3650 2022/04/20	Individual, Germany	Lead is part of several works of art, especially of medieval glasses (window glasses in chapels). For the conservation and restoration it is necessary to have special regulations. Of course restorers are aware of the health and safety regulations	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an</b>



			<b>exemption from authorisation</b>
3651 2022/04/20	Individual, Germany	<a href="#">3651 EU Verbot fuer Blei.docx</a>	Please see response to comment # 3585
3652 2022/04/20	Stiftung Historische Museen Hamburg - Museum für Hamburgische Geschichte, Other contributor, Germany	risk for cultural heritage <a href="#">3652_2022 ECHA-Blei.pdf</a>	Please see response to comment # 3585
3653 2022/04/20	DirryOntwerpt!, Company, Netherlands	<a href="#">3653 D.C. de Bruin commentaar op de nieuwe voorgestelde regeling Lood.pdf</a>	Please see response to comment # 3585
3654 2022/04/20	Glasmalerei Ernst Kraus e. K., Company, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3656 2022/04/20	Universalmuseum Joanneum, Other contributor, Austria	<p>Subject: Request for exemption for the use of lead in designed windows, in relation to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4]. Danger to our European cultural heritage and to the art form of stained glass Danger of destroying the profession of stained glass artists and restorers of stained glass</p> <p>Ladies and Gentlemen, Dear Ms Mariya Gabriel, the material lead, cast, drawn or cold-formed in the form of lead rods or rolled lead, is an indispensable and essential component in the manufacture and restoration of stained glass windows. Fixed at its intersections with solder, it forms a strong and durable base structure that can support coloured and painted glass. It is an art form with a thousand-year history, found in world-famous buildings such as the cathedrals of Chartres, Notre Dame de Paris and Sainte Chapelle (France), the cathedrals of Cologne and Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium) and Canterbury Cathedral and York Minster (United Kingdom), also in the cathedrals of Leon and Girona (Spain), the National Cathedral, Washington DC (USA). Every single sacred building in Europe is unimaginable without lead-framed windows. Moreover, this art form is one of the greatest treasures of museums such as the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum</p>	Please see response to comment # 3585

		<p>(Cologne) and the Burrell Collection (Glasgow), to name but a few examples.</p> <p>After lead glazing reached a heyday as an art phenomenon in medieval Europe and experienced a major revival in the 19th century, it is now practised all over the world and has inspired modern artists of international standing, such as Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz and Gerhard Richter.</p> <p>Lead's malleability, strength and sustainability over centuries have made its unique properties irreplaceable as an essential component of stained glass. Without lead, the historic windows of our cultural monuments and museums could not be repaired, conserved and preserved. Moreover, no more great works of art could be created in this genre, making this material essential for the continuation and preservation of this unique art form.</p> <p>The toxicity of lead is very well known and its health risks are effectively managed by professional stained glass artists, fabricators and conservators throughout the world. The use of, among other things, exhaust systems, appropriate personal protective equipment (PPE) and regular blood tests ensure that the many thousands of people who work in this industry do so safely and with minimal and carefully controlled risk.</p> <p>We urge ECHA and the European Commission to exempt the use of lead in the manufacture, conservation, storage and display of stained glass from the proposed ban. Such a ban would not only devastate the livelihoods of glass artists, craftsmen and restorers involved in the care of Europe's stained glass heritage, but would also make it more difficult to maintain and display these works in museums, churches and public buildings. The effects of such a ban would be felt throughout the world and would ultimately mean the death knell for one of humanity's most beautiful art forms.</p> <p>Yours sincerely  Ass. Prof. Dr. rer. medic. Dipl.-Rest. (FH) Paul-Bernhard Eipper  Head of Restoration  paul-bernhard.eipper@museum-joanneum.at  Phone +43-699/1330-8811  Mobile +43-664/8017-9561  Universal Museum Joanneum  Museum Service  Weinzöttlstraße 16, 8045 Graz, Austria  www.museum-joanneum.at</p>	
3658 2022/04/20	Committee of Art Sciences of the Polish Academy of Sciences , Academic institution,	<p><a href="#">3658_Uchwała KNoS w sprawie zakazu używania ołowiu.docx</a></p>	Please see response to comment #

	Poland		3585
3659 2022/04/20	Van der Staaij Ambachtelijke Restauratie, Company, Netherlands	<a href="#">3659 Voorbeeldbrief aan ECHA Europese commissie (1).doc.docx</a>	Please see response to comment # 3585
3660 2022/04/20	Individual, Belgium	<a href="#">3660 doc lood.pdf</a>	Please see response to comment # 3585
3661 2022/04/20	Canterbury Cathedral, Other contributor, United Kingdom	<a href="#">3661_20220420 ECHA t.pdf</a>	Please see response to comment # 3585
3662 2022/04/20	Individual, Germany	<a href="#">3662_SRestaurier22042013000.pdf</a>	Please see response to comment # 3585
3663 2022/04/20	Restaurierungsatelier & Mosaikkunst Dyroff, Company, Germany	<a href="#">3663_Kommentar EU Verbot von Blei_2.pdf</a>	Please see response to comment # 3585
3664 2022/04/20	Individual, Germany	Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4]	Please see response to comment # 3585
3665 2022/04/20	Wien Museum, Regional or local authority, Austria	<a href="#">3665_WM_Bleiverbot.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
3666 2022/04/20	Atelier Illumen, Company, Belgium	<a href="#">3666_Brief aan ECHA - Europese commissie.docx.pdf</a>	Please see response to comment #

			3585
3667 2022/04/20	Individual, Germany	<a href="#">3667_Bleibrief.docx</a>	Please see response to comment # 3585
3668 2022/04/20	voestalpine Wire Austria GmbH, Company, Austria	<a href="#">3668_voestalpine Wire Austria GmbH + voestalpine Special Wire GmbH - Use of Lead.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3669 2022/04/21	GLACRYL Hedel GmbH, Company, Germany	<a href="#">3669_GLACRYL Lead Pb.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
3671 2022/04/21	Staatliche Dombauhütte Regensburg, Company, Germany	Staatliche Dombauhütte Regensburg Domgarten 4 93047 Regensburg / Germany www.stbar.bayern.de <a href="#">3671_Dombauhütte_Ausnahmeregelung_Blei.pdf</a>	Please see response to comment # 3585
3672 2022/04/21	Dombauhütte Köln, Other contributor, Germany	<a href="#">3672_Anschreiben Dombauhütte Glasrestaurierung.pdf</a>	Please see response to comment # 3585
3674 2022/04/21	Evangelische Kirche Heidelberg, Other contributor, Germany	<a href="#">3674_20220421144654.pdf</a>	Please see response to comment # 3585
3675 2022/04/21	hosanna, Company,	<a href="#">3675_Brief aan ECHA_hosanna.pdf</a>	

	Belgium		Please see response to comment # 3585
3676 2022/04/21	Germanisches Nationalmuseum, Academic institution, Germany	<p>Subject: Request for exemption for the use of lead for the preservation, storage, reconstruction and presentation of historic cultural heritage and for the maintenance of historic art and craft techniques, related to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4]. Danger to our European cultural heritage</p> <p>Ladies and Gentlemen,</p> <p>Over the millennia, lead has been used in the production of many different cultural goods. Today, it forms an essential part of our identity-forming cultural heritage. We encounter lead in its elementary form, for example, in important historical sculptures, handicraft objects, stained glass or as a component of technical equipment and historical musical instruments, in architecture and in many other applications. Its compounds, in the form of lead-containing pigments, were widely used in European painting or formed the basis for ceramic glazes, for example.</p> <p>Without lead and the knowledge of its processing, these historical cultural assets in our museums and our cultural monuments could not be repaired and preserved furthermore. Moreover, works of art in the historical techniques of stained glass or organ building etc. could no longer be created, so that this material is indispensable for the continued existence and preservation of our material and immaterial cultural heritage.</p> <p>The toxicity of lead is well known and its health risks are effectively managed in museums and by professional restorers, artists and craftsmen. The use of, among other things, exhaust systems, appropriate personal protective equipment (PPE) and blood tests ensure that people working in this industry do so safely and with minimal and carefully controlled risk.</p> <p>We urge ECHA and the European Commission to exempt from the proposed ban the use of lead in the conservation, storage, reconstruction and display of cultural objects made from or using lead, and for the maintenance of historic arts and crafts techniques. Such a ban would not only complicate and endanger the maintenance and presentation of these works in museums, churches and public buildings, but would also destroy the basis for restorers and historically working artists and craftspeople who are involved in the care of Europe's tangible and intangible cultural heritage.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>  <b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>

		Prof. Dr. Daniel Hess, General Director Germanisches Nationalmuseum, Leibniz Research Museum of Cultural History	
3677 2022/04/21	Monumentenwacht provincie Antwerpen, Regional or local authority, Belgium	Glas-in-lood vormt al eeuwen de ogen van vele monumenten, of het nu kerken, openbare gebouwen of woningen zijn. Het is beeldbepalend en geeft de beleving een extra dimensie of je nu binnen of buiten een gebouw staat. Dit is te danken aan deze eeuwenoude techniek die het mogelijk maakt grote en complexe tekeningen te maken en deze duurzaam te kunnen behouden en onderhouden. Lood is daarbij letterlijk en figuurlijk de bindende factor en onvervangbaar. De gevaren van lood zijn genoegzaam bekend en het is gewoon kwestie van de juiste maar werkbare maatregelen te treffen om met de nodige vakkenis het ambacht van glazenier te kunnen blijven uitoefenen. Ook als het over nieuwe werken gaat. Als onroerend erfgoedzorgster staat Monumentenwacht regelmatig oog in oog met deze prachtige kunstwerken. Door hun opbouw zijn ze prima te onderhouden, eeuwen lang. Maar daar hoort onmiskenbaar lood bij!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3678 2022/04/21	Vitraux en binôme, Company, Belgium	<a href="#">3678. Dérogation plomb vitraux.pdf</a>	Please see response to comment # 3585
3679 2022/04/21	Individual, Germany	An Ms. Mariya Gabriel Directorate-General for Education and Culture European Commission 1049 Bruxelles/Brussel Belgium  Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalerei restauratoren  Sehr geehrte Damen und Herren, sehr geehrte Frau Mariya Gabriel, das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von	Please see response to comment # 3585

		<p>Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.</p> <p>Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.</p> <p>Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.</p> <p>Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüppertz und Gerhard Richter begeistert.</p> <p>Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.</p> <p>Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen</p>	
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		[Unterschrift /Institution]	
		<a href="#">3679_Anschreiben Belgien.docx</a>	
3680 2022/04/21	Individual, Germany	<p>An die European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finnland</p> <p>Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalerei restauratoren</p> <p>Sehr geehrte Damen und Herren, sehr geehrte Frau Mariya Gabriel, das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann. Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar. Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen. Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian</p>	Please see response to comment # 3585



		<p>Clarke, Narcissus Quagliata, Markus Lüpertz und Gerhard Richter begeistert. Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist. Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten. Mit freundlichen Grüßen</p> <p>[Unterschrift /Institution] Stefan Lücking</p>	
3681 2022/04/22	Individual, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3682 2022/04/22	Riehle+Assoziierte GmbH+Co. KG, Industry or trade association, Germany	<a href="#">3682_2022_04_22_Antrag_Ausnahmeregelung_Blei_Europäische_Kommission_SB.pdf</a>	<b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead</b>

			<p><b>metal (EC 231-100-4) in Annex XIV</b></p> <p>Please see response to comment # 3585</p>
3683 2022/04/22	FH Potsdam, Stadt I Bau I Kultur, Academic institution, Germany	<p>Ausnahmen vom generellen Verbot von Blei und Bleierzeugnissen für die Erhaltung kulturellen Erbes</p> <p><a href="#">3683_Protestnote gegen ein generelles Verbot von Blei_FHP_Helsinki.pdf</a></p>	<p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p> <p>Please see response to comment # 3585</p>
3684 2022/04/22	Koninklijke Academie voor Schone Kunsten Antwerpen - DKO, Academic institution, Belgium	<p><a href="#">3684_KASKA_DKO.pdf</a></p>	<p>Please see response to comment # 3585</p>
3685 2022/04/22	Exeter Cathedral, Other contributor, United Kingdom	<p><a href="#">3685 Letter to ECHA - stained glass and lead - Exeter Cathedral.docx</a></p>	<p>Please see response to comment # 3585</p>
3686 2022/04/22	Individual, France	<p>Diagnostica Stago wishes to comment on public consultation related to lead - see confidential document attached.</p> <p><i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>

			<p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b></p> <p><b>B.1.1. General principles for setting latest application dates/sunset dates</b></p> <p><b>B.1.1.1. Legal background</b></p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b></p> <p><b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>C.1 Process information</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for</b></p>
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			<p>exemptions under Art. 58(2) based on existing legislation</p> <p>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</p> <p>C.2.06 Exemption request for uses in medical devices</p>
3688 2022/04/22	VDMA Armaturen I VDMA Valves, Industry or trade association, Germany	<p>s. attachment</p> <p><a href="#">3688_Statement VDMA Armaturen REACH Blei Anhang XIV_20220422.pdf</a></p>	<p>A.1.5. Aspects not considered in ECHA's prioritisation</p> <p>A.1.5.2. Authorisation is disproportionate and/or means a ban</p> <p>A.1.5.3. Use specific considerations</p> <p>A.1.5.4. Control of risks</p> <p>A.1.5.5. Availability of suitable alternatives</p> <p>A.1.5.6. Socio-economic benefits of continued use</p> <p>A.2.18 Essential role of lead metal for Green Deal and circular economy</p> <p>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</p> <p>C.1.1. General principles for exemptions under Art. 58(2)</p> <p>C.1.3. Aspects not justifying an</p>

			<p><b>exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
3689 2022/04/22	Individual, Germany	<p>Sehr geehrte Damen und Herren!</p> <p>Mit Sorge lese ich, dass die Verarbeitung von Blei in Zukunft einer Sondergenehmigung bedarf. Dies würde bedeuten, dass für jede Anwendung dieses Stoffes (Produktion, Verarbeitung, Lagerung) eine Sonderzulassung erforderlich wäre.</p> <p>Bei neuen oder historischen farbigen Glasfenstern und Bleiverglasungen bedeutet dies, dass weder die Herstellung, noch die Restaurierung, noch die Lagerung oder Präsentation z.B. im Museum ohne Sondergenehmigung möglich wäre.</p> <p>Farbige Bleiverglasungen und bleiverglaste Glasmalereien sind ein wertvoller Teil unserer Kultur und müssen deshalb erhalten, gefördert und geschützt werden.</p> <p>Ich bitte Sie deshalb, dies bei Ihrer Entscheidung zu berücksichtigen und für die kulturelle und historisch gewachsene Anwendung von farbigen Glasfenstern und Bleiverglasungen (das heißt für Produktion, Verarbeitung, Lagerung) eine Ausnahme zu machen, bzw. eine Ausnahmegenehmigung zu erteilen.</p> <hr/> <p>Ladies and Gentlemen!</p> <p>I read with concern that the processing of lead will require a special permit in the future. This would mean that a special authorization would be required for each application of this substance (production, processing, storage).</p> <p>In the case of new or historical stained glass windows and stained glass, this means that neither the production nor the restoration, nor the storage or presentation, e.g. in the museum, would be possible without a special permit.</p> <p>Colored stained glass and stained glass are a valuable part of our culture and must therefore be preserved, promoted and protected.</p> <p>I therefore ask you to take this into account when making your decision and to make an exception for the cultural and historical use of colored glass windows and stained glass (i.e. for production, processing, storage) or to grant a special permit.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3690 2022/04/22	Berlin-Brandenburgische Akademie der Wissenschaften, Corpus Vitrearum Medii Aevi. Arbeitsstelle für	<p>Request for exemption for the use of lead in designed windows, related to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4].  Danger to our European cultural heritage and to the art form of stained glass.  Danger to the destruction of the professional practice for stained glass artists and stained glass conservators</p> <p><a href="#">3690_Letter_CVMA_Germany_ECHA.pdf</a></p>	<p>Please see response to comment # 3585</p>

	Glasmalereiforschung Potsdam, Academic institution, Germany		
3692 2022/04/22	Individual, Romania	<p>Ladies and Gentlemen!</p> <p>I read with concern that the processing of lead will require a special permit in the future.</p> <p>This would mean that a special authorization would be required for each application of this substance (production, processing, storage).</p> <p>In the case of new or historical stained glass windows and stained glass, this means that neither the production nor the restoration, nor the storage or presentation, e.g. in the museum, would be possible without a special permit.</p> <p>Colored stained glass and stained glass are a valuable part of our culture and must therefore be preserved, promoted and protected.</p> <p>I therefore ask you to take this into account when making your decision and to make an exception for the cultural and historical use of colored glass windows and stained glass (i.e. for production, processing, storage) or to grant a special permit.</p>	Please see response to comment # 3689
3695 2022/04/23	Art Historical Dept. of Bonn University, Academic institution, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3696 2022/04/23	Carel Kruip Glas-In-Lood, Company, Netherlands	<a href="#">3696_Protestbrief_loodvergunning.docx</a>	Please see response to comment # 3585
3697 2022/04/23	Individual, Germany	<p>C. Mueller-Weinitschke Trajanstraße 35 50678 Köln</p> <p style="text-align: right;">19.04.2022</p> <p>An die European Chemicals Agency (ECHA) P.O. Box 400</p>	Please see response to comment # 3585

		<p>FI-00121 Helsinki Finnland</p> <p>Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalereirestauratoren</p> <p>Sehr geehrte Damen und Herren, das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann. Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar. Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen. Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreier, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüppertz und Gerhard Richter begeistert. Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist. Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher</p>	
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		<p>Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen</p> <p>Carola Mueller-Weinitschke</p>	
3698 2022/04/24	Individual, Germany	<p>Ich bin die Tochter der Glasmalerei von Herrn Hubert Deininger, der ehemaligen Kunsrund Glasmalerei Deininger. Ich wuchs mit Kontakten zu vielen Künstlern, begleitete die Restauration der mittelalterlichen Buntverglasung im Ulmer Münster. Es liegt mir daran, dass diese uralte Handwerk weiter bestehen bleibt.</p>	<p><b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3699 2022/04/24	AvD-Glas, Company, Netherlands	<p><a href="#">3699_Blei_ECHA.docx</a></p>	<p>Please see response to comment # 3585</p>
3704 2022/04/24	Individual, Netherlands	<p>Start met het verbannen van lood in de voedselindustrie en waterleidingen. Niet in cultuur gerelateerde producten, de meeste vaklieden eten geen lood maar gaan er verantwoord mee om. In tegenstelling tot de mensen die nog wel loden waterleidingen hebben maar geen geld om ze te vervangen. Daar zit het probleem!</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.4. Control of risks</b></p>
3707 2022/04/24	Individual, Netherlands	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p>	<p>Please see response to comment # 3585</p>



		<p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	
3708 2022/04/24	Individual, Germany	<p><a href="#">3708_Schreiben_ECHA.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>

3709 2022/04/25	Individual, France	<p>It will be impossible to practice my stained glass craft if the use of lead and lead products is restricted to 'permit only' - I practice my own Health and Safety processes in the use of lead came and paints and safely dispose of waste. I get an annual blood test for lead. This has to be a sensible approach to stained glass making not excessive bureaucracy and restrictions</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3712 2022/04/25	Individual, Canada	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and</p>	<p>Please see response to comment # 3585</p>

		conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.	
3714 2022/04/25	Individual, Australia	N/A	
3716 2022/04/25	RSP GmbH, Restaurierung und Denkmalpflege, Company, Germany	<a href="#">3716 Comment[REACH Anhang XIV, EG-Nummer 231-100-4].doc</a>	Please see response to comment # 3585
3717 2022/04/25	HAYER & BOECKER, Company, Germany	<a href="#">3717 recom com call for info questionnaire en.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio- economic benefits of continued use</b> <b>A.2.36 Attached COM questionnaire</b>
3718 2022/04/25	Individual, Ireland	I hereby state my objection to this proposal and request that consideration be given to a for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio- economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3719 2022/04/25	Individual, Germany	<a href="#">3719 Ausnahmegenehmigung Blei Helsinki.pdf</a>	

			Please see response to comment # 3585
3721 2022/04/25	Albert Jung GmbH, Glaserei & Kunsthandel, Company, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3722 2022/04/25	Union Académique Internationale, International organisation, Belgium	<a href="#">3722_066.IA.KH.2022.UAI.pdf</a>	Please see response to comment # 3585
3724 2022/04/25	Individual, United Kingdom	My sister is a stained glass artist in France and this would drastically effect her lively hood	Thank you for your comment.
3726 2022/04/25	Stiftung Preußischer Kulturbesitz Berlin, Kunstgewerbemuseum, Regional or local authority, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3727 2022/04/25	DERIX GLASSTUDIOS GmbH & Co. KG, Company, Germany	<a href="#">3727_EHCA (Derix Glasstudios).pdf</a>	Please see response to comment # 3585
3729 2022/04/25	Individual, Germany	<a href="#">3729_EHCA (R.Schmitt).pdf</a>	
3730 2022/04/25	Exeter Cathedral, Other contributor, United Kingdom	<a href="#">3730 Letter to ECHA - stained glass and lead - Exeter Cathedral JG.docx</a>	Please see response to comment # 3585
3734 2022/04/25	Fenix Glas BV, Industry or trade association, Netherlands	Lood voor glas-in-lood is onvervangbaar. Lood zelf is niet giftig, lood oxidatie is giftig en daar kan de branche prima veilig mee omgaan. <a href="#">3734 brief aan ECHA Europese commissie (1).docx</a>	Please see response to comment # 3585
3737 2022/04/25	Individual, Australia	Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number	

		<p>231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	Please see response to comment # 3585
3738 2022/04/25	AvD-Glas Koblenz, Company, Germany	<a href="#">3738 Loodverbod ECHA .docx</a>	Please see response to comment # 3585
3739 2022/04/25	Germany, Member State	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3740 2022/04/25	Verband der Restauratoren (German Professional Association of Restorers- Conservators),	<a href="#">3740 VDR-Brief_EuropeanChemicalsAgency.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

	National NGO, Germany		<p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3741 2022/04/25	Verband der Restauratoren, National NGO, Germany	<a href="#">3741_VDR-Brief_EuropeanChemicalsAgency.pdf</a>	Please see response to comment # 3740
3742			

2022/04/25	Verband der Restauratoren (German Professional Association of Conservator-Restorers), National NGO, Germany	<a href="#">3742_VDR-letter_EuropeanChemicalsAgency.pdf</a>	Please see response to comment # 3740
3744 2022/04/25	British Society of Master Glass Painters, Industry or trade association, United Kingdom	<a href="#">3744_BSMGP_representation.docx</a>	Please see response to comment # 3585
3745 2022/04/25	Individual, Germany	Request for exemption for the use of lead in designed windows, related to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4]. <a href="#">3745_EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Finnland.pdf</a>	Please see response to comment # 3585
3746 2022/04/25	British Society of Master Glass Painters, Industry or trade association, United Kingdom	<a href="#">3746_BSMGP_representation.pdf</a>	Please see response to comment # 3585
3747 2022/04/25	Swiss Association for Conservation and Restoration SKR/SCR, Other contributor, Switzerland	<a href="#">3747_2022_Brief ECHA .pdf</a>	Please see response to comment # 3585
3748 2022/04/25	Bayerisches Landesamt für Denkmalpflege, Regional or local authority, Germany	<a href="#">3748_2022-04-25 Blei ECHA.pdf</a>	Please see response to comment # 3585
3750 2022/04/25	Individual, United Kingdom	The use of lead came, in the manufacture and restoration of stained glass is a fundamental necessity. Stained glass makers are well versed in the precautions to be taken when using lead - I have been a stained glass maker for fifty years and blanche at the thought of yet another layer of unnecessary nay destructive legislation to be saddled with. Please do not carry this out. Regards, Roland Mitton DA, AMGP Roland Mitton Stained Glass The Garden House, Forgandenny,	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>

		Perth, Scotland PH2 9EL	<b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3752 2022/04/25	Beulco GmbH & Co KG, Company, Germany	<p>We understand from the prioritisation approach that the wide dispersiveness of uses is assessed on the basis of the types of actors which are relevant for the use of the substance considering the fact that wide dispersiveness decreases from consumers to industrial uses. Furthermore, the presence in general of lead in some articles supplied for professional and consumer use increases the prioritisation level.</p> <p>Lead in our company</p> <ul style="list-style-type: none"> <li>- Our use of lead relates to the processing of lead containing brass and red brass alloys in order to produce sanitary articles and connection technology in the drinking water sector.</li> <li>- Our industry sector use of lead, as a substance, is therefore limited to the industrial level (SU15) and there are no uses by professionals or consumers.</li> <li>- In general suppliers of sanitary equipment either have a re-melting set-up where standard brass alloys are re-melted and casted in the final shape or have some other process where brass is reshaped from a standard shape into the complex shape of a fitting, sanitary body or accessoire..</li> <li>- Our company does not operate a smelting or re-melting plant itself, but uses pre-products from the semis industry, which are formed and/or mechanically processed in our own facilities.</li> <li>- Lead is present in our brass and red brass alloys at levels of up to 3 % depending on the type of brass alloy used.</li> <li>- This represents a lead use in our industrial settings of maximum xxxx t lead/year</li> <li>- Compared to the lead manufactured and/or imported volumes mentioned in registration data (higher than 1,000,000 t/y. ECHA, 2021), our use represents a negligible proportion (lower than 0,001 %).</li> </ul> <p>Lead emissions</p> <ul style="list-style-type: none"> <li>- Potential emissions during uses of alloys are considered negligible as the release may rather occur at the waste stage (Source: Plomb et principaux composés, Ineris, 2015).</li> </ul>	<b>A.1.1.2. Legal basis for prioritisation</b> <b>A.1.1.3. Prioritisation approach applied</b> <b>A.1.1.5. New information and next steps towards the final recommendation</b> <b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b> <b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation,</b>



		<p>- However, our industry is highly based on recycling and respond to the Circular Economy objectives. For instance, our company relies for 65% on recycled brass.</p> <p>- This prevents any uncontrolled release of lead since products reaching the end-of-life stage return to the production loop where environmental releases are fully controlled through the Industrial Emissions Directive which is currently under revision as part of the European Green Deal.</p> <p>- Further, lead emissions resulting from industrial uses in the EU have drastically decreased during the last decades. Indeed, according to the International Lead Association (ILA), the European Pollutant Release and Transfer Register (E-PRTR) data indicates, emissions of lead to air reduced by 88% while emissions to water reduced by 80% between 2007-2020.</p> <p>Workers exposure Workers exposure is controlled through workers safety legislation which is also under review:</p> <p>- The Chemicals Agents Directive (CAD) which is currently under revision in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027 which have set ambitious targets to further protect workers from risks at the workplace and with the objective to reach a Zero approach to work-related deaths in the EU.</p> <p>- The Carcinogens and Mutagens Directive (CMD) which has recently been amended and includes limits for inorganic lead and its compounds as well as biological limit and health surveillance measures which will reinforce the protection of workers from potential exposure to lead.</p> <p>- We further note that the next Draft Annex XIV amendment currently under preparation (<a href="https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en</a>) addresses seven lead compounds for which the Commission is still considering appropriate to postpone its decision due to the current review of the CAD.</p> <p>Consumers exposure - Potential releases of lead from finished articles are not expected as these products are not in regular or ongoing contact (compared to e.g. consumer products) but rather part of fixed building installations avoiding nearly all exposure of consumers to brass.</p> <p>Drinking water regulations - Potential migration to drinking water is well controlled through the recently revised Drinking Water Directive which sets more stringent safety limits for lead in potable water.</p>	<p><b>ELV, RoHS, IED, BOEL/BLV under CAD</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b></p> <p><b>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for</b></p>
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		<ul style="list-style-type: none"> <li>- For lead, the revised Directive introduces a more stringent limit than the one currently recommended by WHO. More importantly, substitution whenever technically and economically feasible is addressed in the revised Directive under Article 10.3(f).</li> <li>- The revision includes now a review mechanism that will involve ECHA and RAC and that resemble the authorisation process. ECHA is now involved in the process of setting European positive lists of authorised substances for the manufacture of materials in contact with drinking water.</li> <li>- A review mechanism is foreseen, whereby each entry on the positive lists will be assorted with an expiry date requiring companies who wish to maintain the use of a substance to send a review application by the set expiry date. The Committee for Risk Assessment (RAC) will review applications and issue opinions that should allow Commission to decide if an entry should be kept, amended or removed from the positive lists.</li> <li>- The sanitary appliances sector adheres strictly to these regulations to ensure protection of its workers, consumers and the environment.</li> <li>- To that purpose, national drinking water organisations, like KIWA in the Netherlands and DVGW in Germany, regularly conduct product and production audits in sanitary companies.</li> <li>- We believe that all these elements should be considered in the prioritisation process and that postponing the recommendation for lead based on ongoing work on other regulatory processes is justified.</li> </ul>	<b>exemptions under Art. 58(2) based on existing legislation</b>
		<i>Confidential attachment removed</i>	
3753 2022/04/25	Individual, United Kingdom	<p>I work producing leaded glass windows and goods - without lead I cannot work. All practitioners in this field are aware of the issues around lead and follow safety procedures. Lead is essential to this work.</p> <p><a href="#">3753_Lead letter.docx</a></p>	Please see response to comment # 3585
3754 2022/04/25	Individual, United Kingdom	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and</p>	Please see response to comment # 3585

		<p>stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	
3755 2022/04/25	Individual, United Kingdom	<a href="#">3755. Stained glass and lead legislation H Jaeschke.docx</a>	Please see response to comment # 3585
3756 2022/04/25	GAMBICA, Industry or trade association, United Kingdom	<p>We strongly believe that quantities and exposure time should be taken into consideration. In many applications, relatively small quantities can exist and be encased either by conformal coating or larger enclosure, so the exposure time is negligible at, production, use and disposal parts of the life-cycle.</p> <p><a href="#">3756. Lead use in RoHS exemptions.docx</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p>Thank you for the information provided</p>
3757 2022/04/25	Landesamt für Denkmalpflege Baden Württemberg, Regional or local authority, Germany	<p><a href="#">3757. Brief Ausnahmeregelung für die Verwendung Blei in der DP -Brief an ECHA Finnland.docx</a></p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 3740
3758 2022/04/25	Individual, United Kingdom	<a href="#">3758. ECHA letter 2022-04-25.pdf</a>	

			Please see response to comment # 3585
3759 2022/04/25	Individual, United Kingdom	<a href="#">3759 letter regarding use of lead.pdf</a>	Please see response to comment # 3585
3760 2022/04/25	Individual, Germany	<a href="#">3760 Einspruch Wasmuth.pdf</a>	Please see response to comment # 3585
3762 2022/04/25	Individual, Germany	<a href="#">3762 Brief- ECHA .pdf</a>	Please see response to comment # 3585
3764 2022/04/25	Individual, Germany	Lead has been used since ancient times for a vast variety of objects and technical processes. An important part of archaeological and in particular archaeometrical research relies on scientific experiments. Lead ores constituted the major source for silver which was extracted via the process of lead-based cupellation; Medieval Niello, an artificial Pb-Cu-Ag-S compound is a field of extensive study which has to be replicated by using lead, applying the usual health & safety precautions. Any legal actions towards harsh restrictions will impede experimental work and scientific research in universities.	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> <b>C.1 Process information</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.2. Generic exemptions</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.04. Exemption request for Scientific research e.g. in</b>

			<b>universities, public institutions</b>
3765 2022/04/25	Individual, Sweden	I´m glassartist and it´s going to be impossible to work with glassart if I can´t use lead profiles or strips and other material what contains lead. It´s going to be a huge risk that this kind work and art is disappearing whit forbiddance of lead. So please thing about us!! We love our work and art!! Do you want that there is not any beauty in this world? Don´t you want to keep old skills alive? We know how to handle lead så PLEASE let the people who know how to use lead keep going to use it!!!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3766 2022/04/25	Individual, Netherlands	I am an EU citizen and self employed stained glass artist. If the use of lead is banned, then I will become without an occupation and in jeopardy of losing income stability. Also, stained glass is an incredible art form that should be fostered and built upon for years to come.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3767 2022/04/25	Individual, United Kingdom	<a href="#">3767_letter_re_lead.pdf</a>	Please see response to comment # 3585
3768 2022/04/25	Individual, Poland	Plegs	-
3770 2022/04/25	Historisches Museum der Pfalz - Speyer, Academic institution, Germany	We urge ECHA and the European Commission to exempt from the proposed ban the use of lead in the conservation, storage, transport and display of objects of art and cultural heritage. Such a ban would not only complicate and endanger the maintenance and presentation of these works in museums, archives, collections, churches and public buildings, but would also destroy the	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

		<p>basis for conservator-restorers, historically working artists and craftspeople who are involved in the care of Europe's important cultural heritage.</p>	<p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
<p>3774 2022/04/26</p>	<p>Individual, Canada</p>	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p>	<p>Please see response to comment # 3585</p>

		We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.	
3775 2022/04/26	Individual, Germany	Currently, all markers concerning usage of lead on shooting grounds show that even on long term use no traces of lead could be found in the water and in ground layers. Therefore, the ban of lead and its impact on both industry and private citizens is far to high to be put on an short tracked schedule	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3776 2022/04/26	Glashuette Lamberts Waldsassen GmbH, Company, Germany	<a href="#">3776_2022_04_22_Glashuette_Lamberts_-_comments_on_draft_recommendation_for_Annex_XIV_(ECHA).pdf</a>	Please see response to comment # 3585
3777 2022/04/26	Ikaalinen College of Craft and Design, Other contributor, Finland	Our education (Stained Glass department) will ended, if we can´t use traditional technigues (leaded glass). Old Church windows need to repair with old technigues with lead. Also pigments for glass included lead. It is not dangerous, when you know, that you have to wash your hands after working.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b>
3778			

2022/04/26	Museum Moderner KUnst Stiftung Ludwig Wien, European institution, Austria	<a href="#">3778_Brief.docx</a>	Please see response to comment # 3740
3779 2022/04/26	Swiss National Museum, Other contributor, Switzerland	<a href="#">3779_Brief ECHA.pdf</a>	Please see response to comment # 3585
3780 2022/04/26	Individual, Germany	Lead Ban for hunting and sport shooting ammunition as well as sport fishing is not appropriate!	<b>A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban</b>
3781 2022/04/26	Deltamess DWWF GmbH, Industry or trade association, Germany	<a href="#">3781_Stellungnahme zur Aufnahme von Blei.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.4. Control of risks A.1.5.5. Availability of suitable alternatives A.1.5.6. Socio- economic benefits of continued use A.2.24 Applicability of the authorisation requirement for recycling or recovered materials C.1.3. Aspects not justifying an exemption from authorisation C.2.01 Response to requests for exemptions under Art.</b>



			<b>58(2) based on existing legislation</b>
3782 2022/04/26	Friedrich Emigholz GmbH, Company, Germany	<a href="#">3782_Brief gegen Bleiverbot.pdf</a>	Please see response to comment # 3585
3783 2022/04/26	W.E. Schultz GmbH, Industry or trade association, Switzerland	<a href="#">3783_recom com call for info questionnaire en.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.36 Attached COM questionnaire</b>
3784 2022/04/26	Individual, Germany	Absender: Glas Dersch GmbH Bahnhofstraße 22 D-94065 Waldkirchen Germany 26.04.2022  An die European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finnland  Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei	Please see response to comment # 3585

Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalerei restauratoren, Firmen

Sehr geehrte Damen und Herren,  
 das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.

Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.

Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen. Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz und Gerhard Richter begeistert.

Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.

Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.

Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Firmen die künstlerisch tätig sind, Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege

		<p>und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen</p> <p>Thomas Dersch (Geschäftsführer) Glas Dersch GmbH, Bahnhofstr. 22, D-94065 Waldkirchen, Germany</p>	
3785 2022/04/26	Silvergkass Studios, Other contributor, United Kingdom	Lead has been used in the production of stained glass windows for hundreds of years and is still used in the same tradition for both new windows and the restoration of ancient ones.	Thank you for the information provided
3786 2022/04/26	Individual, Germany	Your submission is successfully received. Your reference number is	Please see response to comment # 3585
3789 2022/04/26	Ministero della Cultura, National Authority, Italy	Lead, cast, milled or extruded into lead comes or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Its malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the historic windows of our heritage sites and museums could not be repaired, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form. <a href="#">3789_20220426_090847.PDF</a>	Please see response to comment # 3585
3790 2022/04/26	Individual, Germany	<a href="#">3790_Bleiverbot Brief.pdf</a>	Please see response to comment # 3585
3792 2022/04/26	De Witte Raaf, Company, Netherlands	<a href="#">3792_brief aa nECHA en Mariya Gabriel, Directorate-General for Education and Culture.zip</a>	Please see response to comment # 3585
3795 2022/04/26	Individual, Switzerland		

		<i>Confidential attachment removed</i>	Please see response to comment # 3740
3796 2022/04/26	Bundesinnungsverband des Glaserhandwerks, Industry or trade association, Germany	<a href="#">3796_ECHA_Einspruch_Bleiverglasung.pdf</a>	Please see response to comment # 3585
3797 2022/04/26	Erzbistum Köln, Generalvikariat, Other contributor, Germany	<a href="#">3797_2022.04.25_European_Chemicals_Agency_Helsinki.pdf</a>	Please see response to comment # 3585
3798 2022/04/26	Stiftung Deutsches Historisches Museum, Other contributor, Germany	<a href="#">3798_ECHA_Blei(english)_DHM.pdf</a>	Please see response to comment # 3740
3800 2022/04/26	Individual, France	Je suis Vitrailliste cheffe d'entreprise. Le plomb est un élément indispensable pour la réalisation des vitraux et aujourd'hui IREEMPLACBLE. Le vitraux que nous créons ou restaurons ne représentent aucun danger pour nos clients. Nous avons équipé notre atelier de machines spécifiques et contrôlons régulièrement nos taux de plomb.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>
3801 2022/04/26	Městská část Praha 1, Regional or local authority, Czech Republic	<a href="#">3801_Žádost_o_Výjimku_pro_používání_olova_-_Helsinki.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>

			<b>C.2.08 Exempt use in art and building sector</b>
3804 2022/04/26	Individual, Germany	<a href="#">3804_Brief_ECHA.docx</a>	Please see response to comment # 3740
3805 2022/04/26	Individual, France	Maitre verrier Vitrailliste  <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3806 2022/04/26	Glaserei Gärlich GmbH, Company, Germany	<a href="#">3806_Ausnahmeregelung für die Verwendung von Blei-H.pdf</a>	Please see response to comment # 3585

3807 2022/04/26	Kantonale Denkmalpflege Basel-Stadt, Regional or local authority, Switzerland	<a href="#">3807_BRF European Chemicals Agency 2022-04-26.pdf</a>	Please see response to comment # 3585
3808 2022/04/26	Individual, France	Je suis émailleuse d'art sur métaux et le plomb me permet de créer avec des superpositions d'émaux qui subissent les cuissons multiples contrairement aux émaux Sans plomb. De plus, une fois cuit mes créations ne sont pas dangereuses pour mes clients car il n'ont aucun lien avec la nourriture.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b>
3809 2022/04/26	Individual, France	Artiste plasticien, j'utilise notamment du cristal pour sa transparence. Le cristal est composé de +/- 20% de plomb. en aucun cas ce cristal composant les sculptures ne peut être ingéré. Par ailleurs il n'existe aucun équivalent pour obtenir une telle transparence de verre épais. <a href="#">3809 lettre consultation plomb.pdf</a>	Please see response to comment # 3805
3810 2022/04/26	Individual, Germany	As a legal gun owner, mastergunsmith and passionated hunter i don´t agree the decided ban of lead. If lead would be so dangerous as your recommendation consideres a ban should be obsoled because of the death of thousands legal hunter generations and familys wich consumed "poisoned" wild meat. In my opinion this is a ideology and political motivated battle against hunting and legal privat gun property.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>
3812 2022/04/26	Individual, France	Mon atelier professionnel de poterie-céramique utilise du plomb dans la fabrication de ces émaux. Pour l'appliquer, la sécurité est mis en place. Il ne peut être remplacé par une autre substance. Mes vos créations ne présentent pas de danger pour le consommateur car elles sont cuitent à haute température. Le plomb s'avère inexistant à l'utilisation de l'objet. Sans cette matière première, je ne peux continuer à exercer mon art qui est unique.  <i>Confidential attachment removed</i>	Please see response to comment # 3805
3813	Individual,		

2022/04/27	United Kingdom	<a href="#">3813 Letter to The European Chemicals Agency (ECHA) 26.4.22.pdf</a>	Please see response to comment # 3585
3814 2022/04/27	Glas in Lood Groningen, Company, Netherlands	<i>Confidential attachment removed</i>	Please see response to comment # 3858
3815 2022/04/27	Individual, Germany	Das Verbot ist nicht zielführende.	Thank you for your opinion.
3816 2022/04/27	Individual, France	Sculpteur sur métal travaillant sur les équilibres, les mobiles et les objets en mouvement, j'utilise le plomb pour couler des contrepoids à l'intérieur de mes pièces. Sa densité le rend irremplaçable et le fait qu'il soit enfermé à l'intérieur des objets le rend inoffensif pour le consommateur.  <i>Confidential attachment removed</i>	Please see response to comment # 3805
3818 2022/04/27	Individual, France	Let lead being part of old processes.	Thank you for your opinion.
3819 2022/04/27	Stiftung Basler Münsterbauhütte, National NGO, Switzerland	Across Europe, institutions like ours - involved in historic preservation and building conservation - rely on continued unimpeded access to lead. Lead is an indispensable material that cannot be replaced by any other material, not even by modern high-tech materials. <a href="#">3819 BRIE English1 Bleiverbot-Protest-EU-Helsinki 2022.04.27 BBAH.pdf</a>	Please see response to comment # 3585
3820 2022/04/27	EppsteinFOILS GmbH, Company, Germany	Authorization of Lead Metal (EC 231-100-4) EppsteinFOILS supports the comments of WVM (Wirtschaftsvereinigung Metalle) and ILA (International Lead Association). Authorisation of lead will not make a significant contribution to the protection of the environment or the people of the EU and would therefore be disproportionate. It will put a high burden on domestic economy while hazards of imported articles will not be affected. Since long and especially in recent years, measures have been introduced in various fields of legislation to deal with lead, which already had the objective of a higher protection of the environment and people. Older measures have been successfully implemented. The newer measures are currently being implemented and need time to demonstrate the positive effect at an already high level. There is no real acute threat to broad parts of the population or ecosystems or even an aggravation of the situation. There is therefore no need for additional measures in rapid chronological order. Consultations on classification have already shown that the impression of pressure to act is largely generated by individual cases of violations of law or ignorance and not by lack of	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>

		<p>regulation.          The need for action is primarily assumed by a reassessment of abstract intrinsic hazard properties and scenarios.          In fact, the substance lead is mostly handled competently and responsibly. Where this is not the case, no further rules will help, but compliance with the existing rules must be declared, checked and sanctioned in the event of an infringement.          Based on this EppsteinFOILS GmbH opposes obligation for authorization and demands that the effect of legal adjustments and limit value changes should be awaited.          It therefore seems more urgent to enforce compliance with the existing rules on the import of substances and products into the EU strictly before further burdens are placed on the EU's internal economic base.          The substance lead is also a clear candidate for an exemption under Article 58(2).          If, after the update of the REACH Regulation, it becomes apparent that special applications need to be resharpener, this can be done at any time, e.g. via specific restrictions on use.</p>	<p><b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD</b>  <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>  <b>C.1.1. General principles for exemptions under Art. 58(2)</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art.</b></p>



			<b>58(2) based on existing legislation</b>
3821 2022/04/27	Individual, United Kingdom	<a href="#">3821_EN-Sample-letter-stained-glass-and-lead-template-letter.pdf</a>	Please see response to comment # 3585
3822 2022/04/27	Individual, Germany	<a href="#">3822_Brief zur freien Verwendung Aenderung ECHA.pdf</a>	Please see response to comment # 3585
3823 2022/04/27	Individual, United Kingdom	<a href="#">3823_ECHA letter.pdf</a>	Please see response to comment # 3585
3824 2022/04/27	ARCOVE. Asociación para la Restauración y Conservación de Vidrieras de España, National NGO, Spain	<a href="#">3824_EN Sample letter stained glass and lead.pdf</a>	Please see response to comment # 3585
3825 2022/04/27	Akademisches Kunstmuseum Bonn, Academic institution, Germany	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>

			<b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.2. Generic exemptions</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b>
3826 2022/04/27	Akademisches Kunstmuseum Bonn, Academic institution, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3825
3827 2022/04/27	Julius-Maximilians-Universität Würzburg, Academic institution, Germany	<p>Dear members of the recommendation board,</p> <p>Since the discovery of x-rays by Wilhem Conrad Röntgen in Würzburg in 1895, their use in countless applications, ranging from medicine over the food industry to the security at airports, is an indispensable part of our live. However, x-rays but not only useful but also represents a severe health issue. Therefore, it is of utmost importance to screen human beings from x-ray sources.</p> <p>The usual material used at the University of Würzburg is lead (Pb). Lead is inexpensive and ductile, such that it can be easily be used for shielding purposes in scientific research. Often the experimental setups used in basic research, for example in my Department of Physics, are not commercial but especially designed for a particular scientific purpose. Therefore, no commercial or off-the-shelf products exist which could potentially be used for screening. Our institute's workshop has a long-standing expertise in producing effective x-ray shielding from lead metal sheet.</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> <b>C.1.1. General principles for</b>

		<p>Besides its application in x-ray machines, lead is used as a gasket material in cryogenic applications or for special applications in leak valves for ultra high vacuum purposes.</p> <p>Last but not least, a number of artifacts from the original Röntgen lab would become hazardous waste instead of historical relicts and therefore excluded from museum or exhibitions.</p> <p>In summary, lead should not be put on annex 14, especially if used for scientific applications.</p> <p>Best regards,  Prof. Dr. Matthias Bode  Physikalisches Institut, Experimentelle Physik II  Universitaet Wuerzburg  Am Hubland, 97074 Wuerzburg, Germany</p> <p>and</p> <p>Vice-President for Innovation and Knowledge Transfer  Universitaet Wuerzburg  Sanderring 2, 97070 Wuerzburg, Germany</p>	<p><b>exemptions under Art. 58(2)</b>  <b>C.1.2. Generic exemptions</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b>  <b>C.2.06 Exemption request for uses in medical devices</b></p>
3828 2022/04/27	LK Systems AB, Company, Sweden	<p>The proposal to move Lead to the Annex XIV will add extreme difficulties to the industry. This reduction is a very tough challenge for the industry. The number of useable alloys will be very limited. Some countries (e.g. Sweden, Finland and Norway) also requires special quality of the brass in drinking water application, so called DZR or CR corrosion resistant alloys which will reduce the number of possible alloys even further.</p> <ul style="list-style-type: none"> <li>- These new low lead alloys are very difficult to machine and to cast. Small producers will have problem to survive since it will require essential investments in new machines.</li> <li>- The energy consumption to machine these new materials is also a factor that will influence.</li> <li>- Recycling of brass will not be possible as per today where we in general recycle up to 90%. These new alloys with particular low levels of lead will significantly reduce the possibility to recycle existing brass/brass product due to the higher amount of lead. Instead mining of virgin copper and zinc needs to be done to be able to reach these lower levels by diluting the alloy melt to reach the low lead content. And no one knows what to do with the old, scrapped brass. It will be useless just piled in stacks. Please also note that there is no commercial nor technical method to purify brass from lead.</li> <li>- The cost for brass products in these new alloys will significantly increase due to higher amount of copper, small amount of recycled material, the complexity and longer producing cycle times, heavy machinery, and higher energy use.</li> </ul>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.25 Upfront clarification needed on</b></p>

		<p>- Brass alloys has got a high economic scrap value which is one reason for the high recycling grade. With new alloys, old brass products will not be of same interest of recycling.</p> <p>- By banning lead, it will increase the environmental footprint of our products.</p>	<p><b>authorisation requirement for alloys as special mixtures</b>  <b>C.1.1. General principles for exemptions under Art. 58(2)</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
		<p><a href="#">3828_LK_Systams_AB_Comments_to_ECHA_Annex_XIV_Lead.pdf</a></p>	
3829 2022/04/27	Individual, Netherlands	<p><a href="#">3829_Glasatelier_Oud_Rijswijk_protest.docx</a>  Confidential attachment removed</p>	Please see response to comment # 3585
3830 2022/04/27	Individual, Germany	Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern	Thank you for your comment.
3832 2022/04/27	ICOMOS Austria, International NGO, Austria	<p>Subject: Request for a necessary exemption on the ECHA's plan to include lead in the list of substances subject to authorisation (Appendix XIV of the REACH Regulation)</p> <p>Dear Sir,</p> <p>ICOMOS Austria, as expert body in the field of World Heritage, wishes to raise its severe concerns about the European Chemicals Agency's (ECHA) plan to include the material lead in Appendix XIV (Authorisation List) of the REACH Regulation. This would pose a major threat to the conservation and maintenance of our cultural heritage and would also destroy the livelihoods of countless conservator-restorers and craftsmen, an economic, cultural and social impoverishment on a massive scale.</p> <p>Lead is essential to a multitude of cultural heritage sectors and its use has a history reaching back thousands of years. Just to name the most important and relevant in cultural heritage:</p>	Please see response to comment # 3875

		<ul style="list-style-type: none"> <li>◦ stained glass</li> <li>◦ organ building (production and repair of organ pipes)</li> <li>◦ classical stonemasonry (filling material between stones, to cover stone sills, cornices and iron joints of stones)</li> <li>◦ historic roofing</li> <li>◦ lead in bronze sculpture</li> <li>◦ Roman water pipes</li> <li>◦ lead sarcophagi from early Middle Ages</li> <li>◦ medieval pilgrims' badges, toys, household articles</li> <li>◦ medieval weights for nets (fishing) and fabric pilots (textiles)</li> <li>◦ remains of industrial activity (metallic slag)</li> <li>◦ lead glazes on ceramics</li> <li>◦ lead glass</li> <li>◦ lead white in painting</li> <li>◦ coins</li> <li>◦ medals or weights</li> <li>◦ printing types or other printing elements</li> </ul> <p>However, especially the art of stained glass and the restoration of Europe's vast heritage of historic medieval to modern stained glass would be dramatically endangered by the inclusion of lead among the substances requiring authorization for use or handling.</p> <p>Lead, cast, milled or extruded into lead comes or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as</p> <ul style="list-style-type: none"> <li>◦ cathedrals of Chartres</li> <li>◦ Notre Dame de Paris and Strasbourg (France)</li> <li>◦ the cathedrals of Cologne and Naumburg (Germany)</li> <li>◦ Brussels and Antwerp Cathedrals (Belgium)</li> <li>◦ Canterbury Cathedral and York Minster (United Kingdom)</li> <li>◦ Leon and Girona Cathedrals (Spain)</li> <li>◦ National Cathedral of Washington DC (USA).</li> </ul> <p>Stained glass is part of the greatest treasures of museums including the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow) to name but a few. While leaded stained glass grew to cultural prominence in medieval Europe and enjoyed a massive revival in the nineteenth century, it is now practiced all over the world and has attracted modern artists of the international stature of Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian</p>	
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		<p>Clarke and Narcissus Quagliata.</p> <p>Lead's malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the historic windows of our heritage sites, museums and historic houses could not be restored, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form. It can also not be replaced by alternative materials in the other heritage sectors mentioned above.</p> <p>The toxicity of lead is well-understood and its risks to health are very effectively managed by stained glass designers, fabricators and conservator-restorers all over the World. Regular blood testing, use of extraction system with appropriate micro-filtration and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk. This is also the case for heritage professionals in the other sectors mentioned above.</p> <p>ICOMOS Austria strongly urge the ECHA and the European Commission to exclude the use of lead in the fabrication, conservation and restoration of stained glass and other cultural goods from its proposed ban. There is a need for an official and permanent regulation that the art and production of stained glass in particular, but also the use and handling of lead in other cultural heritage sectors (some mentioned above), is permanently removed from the list or given a permanent exemption from the EU Chemicals Regulation and all directives on hazardous substances (e.g. 2011/65/EU).</p> <ul style="list-style-type: none"> <li>• Lead is indispensable for the art of stained glass, its creation, conservation and restoration, as well as in a multitude of other cultural heritage sectors;</li> <li>• The effective means of excluding hazards from lead in this area are well known to those professionals handling it;</li> <li>• The amount of lead brought into circulation in the field of restoration, conservation and new creation of stained glass, and the cultural heritage sector in general, is negligibly low;</li> <li>• The cultural damage of its ban to the European cultural heritage would be inconceivably severe.</li> </ul> <p>Not only would a ban wipe out the livelihoods of artists in glass, craftspeople involved in fabrication and conservator-restorers involved in the care of heritage assets in Europe, but its effects would be felt throughout the world, sealing the eventual death sentence of one of the most glorious art forms known to mankind. There is almost no part of the cultural heritage sector that would not be severely impacted by the inclusion of lead among the substances</p>	
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		<p>requiring authorization for use or handling.</p> <p>Yours sincerely,</p> <p>Caroline Jäger-Klein</p>	
<p>3833 2022/04/27</p>	<p>Initiative Kulturgut Mobilität e.V., National NGO, Germany</p>	<p><a href="#">3832_ECHA_Lead-Exemption_ICOMOS-Austria_O-Malley.pdf</a></p> <p><a href="#">3833_Zulassungspflicht für Blei - EN.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.1. Potential other regulatory actions</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.1.5.8. Uncertainty as to whether authorisation will be granted</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>  <b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b></p>

			<p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
3834 2022/04/27	Individual, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3740
3835 2022/04/27	Individual, Italy	Lead ammunition cannot be banned without a valid alternative	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p>
3836 2022/04/27	Federal Monuments Authority, National Authority, Austria	<a href="#">3836_ECHA.pdf</a>	<p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>C.2.03 Exempt uses that have been derogated in existing restrictions addressing</b></p>



			<b>other substances than lead</b> Thank you for the information provided
3837 2022/04/27	Schwing GmbH, Company, Austria	Instead of lead anodes, platinized titanium anodes can be used. Cost of anodes, the lifetime of titanium anodes is not certain, no experience with safety in the field of industrial production. Clarify who can supply this quantity. So far only one supplier known to offer titanium anodes, supply unclear. According to the supplier of the titanium anodes, the process could be technically retooled. It is unclear how titanium anodes behave during current peaks. This could lead to massive erosion/chipping/dissolution of the anodes.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
3838 2022/04/27	Evangelisch-Lutherische Kirche in Norddeutschland, Baudezernat, Standort Greifswald, Other contributor, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3839 2022/04/27	Individual, Germany	<a href="#">3839_2022-04-27_pa_finnland_einspruch bleiverbot.pdf</a>	Please see response to comment # 3585
3840 2022/04/27	HEAPS ARNOLD & HEAPS, Company, United Kingdom	<a href="#">3840_FN27042022.pdf</a>	Please see response to comment # 3585
3841 2022/04/27	Individual, Germany	<a href="#">3841_Einspruch 1 ECHA .pdf</a>	Please see response to comment # 3585
3842 2022/04/27	Individual, France	Stained glassed professionals require an exemption to use lead.	Thank you for your opinion.
3843 2022/04/27	Staatliche Museen zu Berlin - Nationalgalerie - Hamburger Bahnhof, European institution, Germany	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>

			<p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3844 2022/04/27	STMicroelectronics, Company, Switzerland	<p>Lead in metal form is used in limited quantities as an essential solder alloy in some semiconductors to meet the technical functionalities required of the respective semiconductor component and their performance applications. Generally, semiconductors are essential for electronic systems in many industry sectors (including e.g., lighting, intelligent transport systems, automotive, aviation, aerospace, smart grids, renewable energy technologies, industrial tools, agriculture, computing, healthcare and medical devices, consumer electronics, encryption security and smart cards). For the production of many semiconductors that are used in these fields applications, lead is necessary to provide significant environmental benefits in the final sector application.</p> <p>Lead exposure is already highly regulated in the EU through substance-specific legislation covering many sectors and products including manufacture, use and end-of-life/waste (Batteries Directive, RoHS Directive, Directive on end-of-life of vehicles, OHS legislation, Industrial Emissions Directive, Air Quality Standards, Ambient Air Quality Directive, the Water Framework Directive, the Waste Framework Directive, and the Toy Safety Directive).</p> <p>If lead was introduced in Annex XIV of the REACH Regulation, R&amp;D in the semiconductor sector could no longer be conducted in the EU. Moreover, production of semiconductors would only be possible relying on authorisation of an appropriate duration. Given that there is no replacement for lead in the semiconductor industry, authorization does not constitute a viable long-term option, since it is limited in time. Given that most suppliers of lead are located outside the EU, it will be on the semiconductor producers to apply for authorization. This constitutes an excessive administrative burden. In light of this, STMicroelectronics believes that lead should not be included in Annex XIV of the REACH Regulation.</p> <p>STMicroelectronics would support revising the existing EU binding occupational exposure limits and that this should be done by implementing the recent update of the Chemical Agents Directive. STMicroelectronics would suggest that lead is better regulated and managed through targeted REACH restriction for sectors where lead exposure and content may be deemed a risk,</p>	<p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b></p> <p><b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount</b></p>

		in combination with updating the existing binding occupational and biological exposure limits.	<b>of lead in articles should be considered</b> <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b> <b>B.2.01. Request extra long LAD</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
		<a href="#">3844_ST Pb Metal ECHA Consultation April 2022 FINAL.pdf</a>	
3846 2022/04/27	Ernst Architekten BDA, Company, Germany	<a href="#">3846_Einspruch EU-Verbot Blei ECHA.pdf</a>	Please see response to comment # 3585
3847 2022/04/27	Ville de Honfleur, Other contributor, France	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p>	Please see response to comment # 3585

		<p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	
3848 2022/04/27	Endress+Hauser Conducta GmbH+Co. KG, Company, Germany	no  <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b>

			<p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b>  <b>A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete</b>  <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b>  <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>  <b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b>  <b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b>  <b>A.2.32 Difficulties to meet normative requirements under</b></p>
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			<p><b>Ecolabel and/or other standards if lead is included in Annex XIV B.2.01. Request extra long LAD</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p>Please see response to comment # 3856</p>
3849 2022/04/27	ICOM / ICOM-CC, International NGO, France	<p>ICOM-CC strongly urge the ECHA and the European Commission to exclude the use of lead in the fabrication, conservation and restoration of stained glass and other cultural goods from its proposed ban. There is a need for an official and permanent regulation that the art and production of stained glass in particular, but also the use and handling of lead in other cultural heritage sectors, is permanently removed from the list or given a permanent exemption from the EU Chemicals Regulation and all directives on hazardous substances (e.g. 2011/65/EU).</p> <p><a href="#">3849_ICOM-CC_ECHA_Lead_ICOMOS_ICOM_ECCO.pdf</a></p>	<p>Please see response to comment # 3585</p>
3850 2022/04/27	Assemblée nationale, National Authority, France	<p>Sollicité par de nombreux artisans d'art, cette proposition empêcherait de nombreux métiers si essentiels au maintien de notre patrimoine de pouvoir travailler. La dangerosité du plomb est connue dans la profession et les artisans font très attention lors de l'utilisation de cette matière. Pourrait-on envisager une exception pour les ateliers d'art?</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>

3851 2022/04/27	Individual, United Kingdom	Please see attached  <i>Confidential attachment removed</i>	Please see response to comment # 3585
3855 2022/04/27	Deutsche Stiftung Denkmalschutz, Other contributor, Germany	<a href="#">3855_220425_Bleiverbot_ECHA.pdf</a>	Please see response to comment # 3585
3856 2022/04/27	International Lead Association, and Lead REACH Consortium, Industry or trade association, United Kingdom	<p>The organisations represented in this response – listed in Annex 1 – do not support the inclusion of lead metal in REACH Annex XIV. It would be disproportionate and an inefficient risk management measure.</p> <p>In 2020, a typical year for lead production and use, approximately 1.65 million tonnes of lead metal was manufactured in the EU, 73% coming from recycling of end-of-life products, and approximately 1.62 million tonnes of lead metal was used in the EU (Footnote 1 – see Annex 5 (attached) for list of footnotes/references).</p> <p>Use of lead metal in the production of lead-based automotive and industrial batteries is the main application: industrial use in EU battery production currently accounts for 86-90% of the use by volume (Footnote 2). Other smaller-volume industrial uses are listed in Annex 2 to this response. Professional uses of lead are limited to specific applications, e.g. reparative uses of lead solder in plumbing.</p> <p>The organisations represented by this response do not support the consumer use of lead as a substance or in a mixture, not least considering the Restrictions imposed by REACH Annex XVII, Entry 30.</p> <p>Regarding prioritisation scoring: According to the ECHA document, “Prioritisation of substances of very high concern (SVHCs) for inclusion in the Authorisation List (Annex XIV) PRIORITISATION APPROACH” ((Footnote 3; Page 4), the primary basis of prioritisation are the REACH Article 58(3) criteria. Article 58(3) requires taking the mentioned three criteria ‘normally’ into account, but there is no provision how this should be done in practice. Moreover, the consideration of further aspects and criteria is not excluded. Hence, Article 58(3) leaves the discretion to consider other relevant information (i) to the ECHA Member State Committee (MSC) when preparing its opinion on the draft recommendation and (ii) to ECHA when finalising its recommendation.</p> <p>Prioritisation should be used correctly and effectively, to ensure regulatory action is focused on the right substance at the right time. Prioritisation scoring of lead metal based crudely on the Article 58(3) criteria alone does not adequately consider the effectiveness of existing legislation already implemented by the EU to address risk (e.g. restrictions in the ELV and RoHS Directives etc), nor the anticipated impact of on-going regulatory actions (e.g. REACH Restrictions on lead</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double</b></p>

		<p>in ammunition and fishing tackle, Battery Regulation proposal, updated binding workplace limits etc).</p> <p>One of the three main (i.e. Article 58 (3)) criteria for prioritisation is EU use volume in scope of REACH Authorisation. This simplistic approach prejudices high-density materials, particularly metals such as lead, as 'volume' is quantified in tonnes per year.</p> <p>The vast majority (at least 95% (Footnote 2)) of lead metal used in the EU is in applications which result in the incorporation of the metal into an article. Use of lead metal in the EU to produce articles would be in scope of REACH Authorisation but import of the same articles produced outside the EU would not be in scope. Therefore, the competitiveness of EU article producers in a global marketplace would be adversely affected by Authorisation Listing.</p> <p>Other uses, representing less than 5% of the annual use volume, include: use as an intermediate in lead compound manufacture (exempt from REACH Authorisation), use of lead metal in galvanising, use of molten lead as a heat transfer agent, use as a lubricant/tribological agent, and use of lead metal in chemical analysis (fire assay; use in Scientific Research and Development (i.e. less than 1 tpy) is exempt from REACH Authorisation).</p> <p>The presence alone of SVHCs in a process or in an article does not automatically confer a risk to human health or the environment. 86-90% (Footnote 2) of lead used in the EU each year is used to make lead-based batteries. These products are almost exclusively supplied ready for use as sealed articles: during article service life they do not have the potential for end-user exposure nor do they release lead to the environment. In other articles made using lead or lead alloys, the lead-containing parts are usually enclosed inside a complex object, encapsulated in e.g. plastic, or are painted. Therefore from a proportionality perspective it is not appropriate to use the total volume of lead used in the EU for all uses in scope of REACH Authorisation as a surrogate for potential exposure. This approach lacks any assessment of actual exposure/emissions and hence risk and therefore fails a test of proportionality.</p> <p>To ensure a greater degree of proportionality, priority scoring should be applied only to the volume of lead used in the EU where existing legislation is not adequate to address any risk. If this approach were to be adopted, lead metal would attract a significantly lower score: there are no consumer uses, and industrial and professional uses are already regulated by workplace health, safety and environmental legislation including an EU binding OEL and BLV, and the majority of end-use applications are already covered by product-specific and end-of-life legislation as discussed in this response and listed in joint ILA-Lead REACH Consortium Position Paper (Footnote 4).</p> <p>ECHA's lack of consideration of on-going regulatory risk management activities for lead is inconsistent with its approach for other substances in the draft 11th recommendation: As noted in the PRIORITISATION APPROACH document (Page 4), "on-going regulatory risk management activities can be considered when deciding on which substances to include in a specific recommendation, in order to avoid undesired interference between different regulatory actions". According to "ECHA's general responses on issues commonly raised in consultations on draft</p>	<p><b>regulation and ask for regulatory coherence</b></p> <p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b></p> <p><b>A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation</b></p> <p><b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.30 Prioritisation approach prejudices high-density materials</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
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		<p>recommendations" (Footnote 5), prioritisation is a comparative exercise supporting the conclusion on which substances to recommend first, i.e. the priority scores need to be considered in relation to each other and should not be seen in isolation.</p> <p>Referring to the ECHA "Results of the prioritisation" document (Footnote 6); on-going work related to REACH Restriction and/or POP identification was the ONLY reason cited by ECHA as to why it considered it appropriate to postpone the recommendation of MCCP and 1,4-dioxane – substances which were scored more highly by ECHA than lead metal in this round of prioritisation.</p> <p>We question why ECHA did not apply the same rationale in the case of lead metal, especially considering that there is a much broader range of lead-specific legislative measures in progress and/or under review. As with MCCP and 1,4-dioxane, there is already an ongoing REACH Restriction proposal, i.e. for lead in ammunition and fishing tackle, and moreover there are additional relevant regulatory actions also in progress that are also designed to manage risks related to lead exposures, including:</p> <ul style="list-style-type: none"> <li>-The review of the existing EU binding limit values (OEL and BLV) for lead and lead compounds,</li> <li>-The Battery Regulation proposal which is currently under scrutiny by Council and the European Parliament, that includes as Article 6 a requirement for restrictions of certain hazardous substances present batteries when they are placed on the market, or during their subsequent life cycle stages, including the waste phase,</li> <li>-The ELV and RoHS Directives which are under review by the European Commission.</li> </ul> <p>Regarding proportionality and effectiveness: Lead metal is already extensively regulated by lead-specific legislation in the EU, as highlighted in Annex 1 of the joint ILA-Lead REACH Consortium Position Paper (Footnote 4). We therefore question what benefit ECHA believes a recommendation for inclusion in REACH Annex XIV would deliver. Our position is that subjecting lead metal to REACH Authorisation will not deliver any significant reduction in exposure or emissions. Moreover, we doubt whether REACH Authorisation Listing would lead to a faster phase-out of lead than foreseen in existing regulations. Inclusion of lead metal in REACH Annex XIV would lack regulatory coherence, creating many cases of double regulation resulting in inefficient use of resources from both Regulators and EU Industry. Requiring companies to apply for REACH Authorisation for the same uses of lead metal under two different legislative mechanisms (ELV Directive 2000/53/EC and REACH Authorisation / RoHS Directive 2011/65/EU and REACH Authorisation) would mean duplicating work in the ECHA Committees which is already carried out by the consultants appointed by the European Commission in respect of the RoHS/ELV exemption reviews. The exemption reviews and REACH Authorisation applications would in general also take place in parallel, potentially with overlapping yet misaligned timelines. We note from the PRIORITISATION APPROACH document (Footnote 3) that the Authorisation procedure aims to progressively replace substances of very high concern (SVHC) by suitable alternatives as soon as technically and economically feasible. However, the existing legislative framework for lead already aims at substitution in automotive batteries and other applications in</p>	<p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
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		<p>scope of the EU ELV Directive – uses which cover more than 55% (Footnote 2) of the current EU volume. Substitution is mandated by ELV where there is a feasible alternative; exemptions are granted only where there is no technically feasible alternative and are time-limited, reviewed regularly and at a greater frequency than normally envisaged under REACH Authorisation, to re-assess feasibility of potential alternatives. As such, battery and other automotive uses exempted by ELV are already being subject to more stringent substitution pressure based on technical feasibility alone.</p> <p>Moreover, it is expected that all battery use of hazardous substances will in future also be assessed for risks through application of Article 6 of the proposed EU Battery Regulation. In addition to automotive and other battery applications, use of lead in a broad range of electronics and electrical equipment (EEE) is already restricted, except where permitted under time-limited exemption by the RoHS Directive, an application which has been estimated to account for 0.5-1% (Footnote 7) of the annual EU use of lead metal.</p> <p>Collectively at least 87% (Footnotes 2, 8) of the total lead volume used in EU is used in the industrial production of complex objects which are already under pressure for substitution via existing legislation that is at least equivalent to that which could be achieved by REACH Authorisation. The ongoing REACH Restriction proposal on ammunition use will add approximately 4% to the total volume of lead that will be under substitution pressure from existing regulation, meaning that less than 9% of the total volume of lead metal used in the EU would ultimately be covered by REACH Authorisation alone in the context of specific regulatory pressure for substitution – notwithstanding the more general requirements of Directive 2004/37/EC in respect of the obligation for employers to reduce the use of reprotoxic substances at the place of work, in particular by replacing them, in so far as is technically possible. We therefore question the proportionality of an Annex XIV recommendation for lead metal, and therefore its effectiveness.</p> <p>We take this opportunity to remind ECHA of the European Commission’s common understanding paper, “REACH AND DIRECTIVE 2011/65/EU (RoHS) A COMMON UNDERSTANDING” (Footnote 9) – in particular the comments in respect of substances already in Annex II to RoHS being proposed for inclusion in Annex XIV (pp5-6): “it should be noted that decisions taken under Article 5 of RoHS to include materials in Annexes III and IV (exempt applications) must take into account the practicability, reliability or socioeconomic impact of substitution. Moreover, the exemptions are time limited and will only be renewed after submission of the information listed in Annex V to RoHS, including updated details of the practicability and reliability of substitution, an analysis of possible alternatives and a timetable for action to develop /apply possible alternatives. All of these requirements may be seen as mirroring the substitution objective of the REACH Authorisation procedure”. Similar arguments can be applied to applications covered by ELV Annex II exemptions, however the pressure for substitution is even stronger. As with RoHS, substitution is mandated by ELV where there is a feasible alternative; however under ELV time-limited exemptions are granted only where there is no technically feasible alternative. ELV exemptions are reviewed regularly to re-confirm feasibility of potential alternatives, but no socio-</p>	
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		<p>economic factors are considered – which means the pressure for substitution is more stringent under ELV compared to REACH Authorisation.</p> <p>Regarding other, more effective regulatory actions:  Regarding environmental emissions; the current IED provisions and the related NFM BREF process have been a major step forward for the reduction and elimination of pollutants. Recent E-PRTR (Footnote 10) data indicates that across the EU-27 there was an 88% reduction in emissions of lead to air and an 80% reduction in lead emissions to water between 2007-2020. However, the same data highlight that the majority of current lead emissions in the EU now result from activities which are NOT in scope of REACH Authorisation for lead metal.  A recent Pb emission inventory study (Footnote 11) using E-PRTR data, facility emission data from EU lead battery producers and recyclers, and other information sources, concluded that 65% of yearly lead emissions to air in the EU come from thermal power stations, pig iron &amp; steel production, and waste management – activities which are not in scope of REACH Authorisation for lead metal (as they do not use lead metal) and which are all regulated by the IED.  From a proportionality perspective, despite the lead battery value chain, for example, using 86-90% (Footnote 2) of the total EU tonnage of lead per year, the study (Footnote 11) estimated that this value chain contributes just 2.2% of the total Pb emissions to air and 0.02% total Pb emissions to water.  Using data obtained from facilities producing and recycling lead batteries across the EU, another recent study (Footnote 12) concluded that emissions from this value chain have a minimal impact on general population blood lead levels at regional level: "The predicted contribution of Pb in human blood arising from emissions from lead battery manufacturing and recycling for the regional scale was 0.15 µg Pb/L for children (1-3 years) and 0.06 µg Pb/l for adults. This value is about 1% of total Pb blood levels, according to available recent monitoring data for children less than 7 years across Europe".  The Pb emission inventory study (Footnote 11) also confirmed that use of lead-containing ammunition is the major source of lead emissions to water (87%) and soil (98+%). As articles, the use of lead-containing ammunition cannot be subject to REACH Authorisation – and in any case a REACH Restriction has already been proposed and is currently being considered by ECHA's Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC).  The Pb emission inventory study (Footnote 11) then compared anthropogenic emissions with emissions via natural processes, concluding that:  -emissions to water via natural processes are 8 times higher than the total from anthropogenic sources (16,140 vs 2,007 tonnes per year),  -emissions to soil via natural processes are 1.7 times higher than the total from anthropogenic sources once ammunition (for which a REACH Restriction is currently under consideration by the ECHA Committees) is excluded (723 vs 434 tonnes per year).  -strengthening the IED and the E-PRTR Regulation, and delivering the ongoing REACH Restriction proposal on lead in ammunition and fishing tackle, will be more effective at reducing lead</p>	
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emissions to air, water and soil than REACH Authorisation Listing of lead metal.

Regarding worker exposure; the most appropriate and effective way, on an EU-wide basis, to address worker exposure is to strengthen and implement revised occupational and biological exposure limits. The biological limit value (and the OEL) applies not just to workers using lead metal but also to those who might be incidentally exposed to lead in the course of their work, e.g., in demolition, in shipbuilding, repair and breaking, in the scrap industry, in installation and maintenance of lead-containing articles, and more. Therefore, from a regulatory effectiveness perspective the ongoing review of the existing EU binding biological and occupational limit values is key to reducing worker exposure on an EU-wide basis in all workplaces where employees may be exposed to lead in the course of their professional activities and will cover a much wider population that would be in scope of REACH Authorisation.

The companies represented in this response are committed to adopting best practice and continuous improvement in the management of occupational lead exposures. Most EU companies that manufacture lead metal, including those who recycle lead-based batteries, or produce lead batteries, are enrolled in long-standing voluntary exposure management programmes such as that administered by the International Lead Association (ILA) and EUROBAT (the European Association for Automotive and Industrial Battery Manufacturers). Enrolment in these Workplace Blood Lead Reduction Programmes is a condition of membership of the Trade Associations. The current blood lead target, established in 2017, is for no employee to have a blood lead level exceeding 20 µg Pb/dL blood. This target value is less than one-third of the existing EU binding biological limit value of 70 µg Pb/dL blood specified in the Chemical Agents Directive (now transposed to Directive 2004/37/EC). The ILA Voluntary Blood Lead Reduction Programme has resulted in significant reductions in lead exposures in employees working in lead metal manufacturing facilities. At the beginning of the ILA programme in 2013, nearly 2000 workers – i.e. 25% of all workers across ILA member companies – had a blood lead value exceeding 20 µg Pb/dL blood. By the end of 2020, less than 10% of workers in ILA member companies had blood lead levels exceeding the Industry voluntary target of 20 µg Pb/dL blood (Footnote 13).

Regarding other appropriate risk management options: Where unacceptable risk resulting from lead exposures has been identified, the EU has already adopted legislative measures to protect human health, including via the environment, and this work continues e.g. in regards the ongoing discussions on the proposed REACH Restriction for lead in ammunition and fishing tackle. Present regulatory restrictions on lead metal in articles include use in childcare articles and items which could be mouthed by children, toys, drinking water and food contact materials, jewellery, cosmetics, electronic and electrical equipment, household appliances, clothing, textiles and footwear, lead in copper, aluminium and steel alloys, passenger vehicles, and lead shot over wetlands, together with a general restriction under Annex XVII Entry 30 on the supply of lead metal as a substance or in a mixture to the general public. Moreover, the recent Commission Battery Regulation proposal also includes a provision for restricting substances where there is a

		<p>risk identified during a battery’s life cycle (covering 86-90% (Footnote 2) of the current volume of lead metal in scope of REACH Authorisation). These measures already encourage substitution, especially where technical and socio-economically viable alternatives exist.</p> <p>In the case of lead, many of the potential alternative technologies use substances which have similar intrinsic hazards concerns (CMR), as seen in the battery industry. Such substitutions do not automatically bring an overall added-value for human health and the environment when the substance is already used safely. Alternative risk management options are, from this perspective, better suited for the task than REACH Authorisation Listing.</p> <p>Should the existing lead-specific measures be deemed insufficiently effective, they should be strengthened within the existing regulatory framework, including non-REACH product-specific legislation, and properly enforced to ensure both cohesion of the internal market and competitiveness with non-EU actors.</p> <p>If residual unacceptable risks remain about which ECHA, Member States or the European Commission are concerned, instead of a broad-sweep approach of recommending lead metal for inclusion in the REACH Authorisation List, additional targeted REACH Restrictions could be used. This would be more effective and proportionate – and moreover could also apply to imported articles, whereas REACH Authorisation itself would only impact EU production.</p> <p>Regarding impact on the circular economy and end-of-life considerations objectives: A recommendation to include lead metal in REACH Annex XIV disregards the essential role it plays in the EU’s ability to deliver policy objectives including Europe’s Industrial Strategy, the European Green Deal, and the EU’s Circular Economy Action Plan.</p> <p>Lead plays an essential role in the European circular economy of other metals. The carrier metal properties of lead make it an efficient and effective enabler of high-tech recycling in the EU. The EU’s non-ferrous metals recyclers can recover over 20 metals from post-consumer and industrial waste streams, including scrap, catalytic converters, e-waste, and other increasingly complex products at end-of-life (Footnote 14). In this way, lead is a key enabler in maintaining the value of materials and resources for as long as possible by returning them into the product cycle at end-of-life, helping to minimise waste.</p> <p>As shown by the ‘metal wheel’ in the UNEP (2013) report (Footnote 15), the lead value chain is inextricably linked to the production of other valuable and critical raw materials – metals such as zinc, copper, tin, bismuth, indium, gold, silver, and platinum group metals – many of which contribute to future breakthrough technologies for a more sustainable economy. As the EU’s ETN Socrates project has also highlighted (Footnote 16), lead has a fundamental role in delivering the circular economy and in urban mining, enabling the recovery and recycling of other critical metals and materials from electronics waste and other complex products: “lead metallurgy is fundamental if the EU wants to retain its leading position in the global circular economy”.</p> <p>With a quarter of the world’s recycled metals already generated in Europe (Footnote 17), lead’s unique metallurgy helps ensure the EU’s continued global leadership role in the circular economy: the loss of lead metallurgy due to Authorisation Listing would remove a central</p>	
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		<p>process for Europe's multi-metallic recycling industry, making it less efficient and less competitive.</p> <p>The closed loop circular economy of the EU lead battery value chains provides the raw materials needed locally to make new energy storage products, thereby limiting the potential for environmental exposure by keeping lead metal in the value chain and out of Europe's waste stream, indefinitely. Nearly all lead batteries that are available for collection are recycled in the EU by a comprehensive infrastructure of highly regulated facilities (Footnote 18). Every year, more than 100 million used lead batteries are kept out of the EU's waste stream by a value chain embracing circular economy principles and operating in a fully closed loop (Footnote 19). But without EU demand for lead, the 1.2+ million tonnes (Footnote 20) of lead being recycled every year in the EU would instead need to be discarded, somehow, as hazardous waste, or exported to non-EU countries to be used, mainly, for their own battery production. A significant reduction in lead demand driven by REACH Authorisation would also impact the EU economy: currently, approximately €2 billion worth of lead from recycled sources is used per year for EU lead battery production (Footnote 18).</p> <p><a href="#">3856_1LA-PbRC_270422.zip</a> Confidential attachment removed</p>	
3857 2022/04/27	Deutsche Stiftung Denkmalschutz, National NGO, Germany	<a href="#">3857_220425_Bleiverbot_EuropaeischeKommission.pdf</a>	Please see response to comment # 3585
3858 2022/04/27	Individual, United Kingdom	<p>Appeal for Derogation in Respect of proposed EU Regulations on the Use of Lead which would prevent ironwork conservators from practicing their profession, posing a threat to their livelihoods and future of the industry.</p> <p>Lead is commonly used and indispensable in the fixing of heritage cast and wrought ironwork. It is used as a seal and bedding material, and universally in the fixing of metalwork into masonry where it is strong and durable.</p> <p>Lead has been used in conjunction with ironwork since Roman times and can be found commonly on sites world-wide, too many to list here. Banning its use would be impracticable.</p> <p>Lead's malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of heritage ironwork. Without it the historic metalwork of our heritage sites and museums could not be repaired to high standards, making it indispensable to the retention and preservation of historic ironwork.</p> <p>The toxicity of lead is well-understood and its risks to health are effectively managed by ironwork designers, fabricators and conservators all over the World. Regular blood testing, use of</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p>

		<p>extraction and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk.</p> <p>This ban would severely and adversely affect the livelihoods of ironwork conservators and blacksmiths not only in Europe but throughout the world.</p> <p>We strongly urge the European Commission to exclude the use of lead in the conservation of ironwork from its proposed ban.</p> <p>With best wishes,</p>	<p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3859 2022/04/27	KEUCO GmbH & Co. KG, Company, Germany	<p>We understand from the prioritisation approach that the wide dispersiveness of uses is assessed on the basis of the types of actors which are relevant for the use of the substance considering the fact that wide dispersiveness decreases from consumers to industrial uses. Furthermore, the presence in general of lead in some articles supplied for professional and consumer use increases the prioritisation level.</p> <p>Lead in our company</p> <ul style="list-style-type: none"> <li>- Our use of lead relates to the processing of lead containing brass in order to produce sanitary articles and accessories.</li> <li>- Our industry sector use of lead, as a substance, is therefore limited to the industrial level (SU15) and there are no uses by professionals or consumers.</li> <li>- In general suppliers of sanitary equipment either have a re-melting set-up where standard brass alloys are re-melted and casted in the final shape or have some other process where brass is reshaped from a standard shape into the complex shape of a fitting, sanitary body or accessoire</li> <li>- Our company does not operate a smelting or re-melting plant itself, but uses pre-products from the semis industry, which are formed and/or mechanically processed in our own facilities.</li> <li>- Lead is present in our brass at levels of up to 2 % depending on the type of brass alloy used.</li> <li>- This represents a lead use in our industrial settings of maximum xxxxx t lead/year</li> <li>- Compared to the lead manufactured and/or imported volumes mentioned in registration data (higher than 1,000,000 t/y. ECHA, 2021), our use represents a negligible proportion (lower than 0,001 %).</li> </ul>	<p>Please see response to comment # 3752</p>

		<p>Lead emissions</p> <ul style="list-style-type: none"> <li>- Potential emissions during uses of alloys are considered negligible as the release may rather occur at the waste stage (Source: Plomb et principaux composés, Ineris, 2015).</li> <li>- However, our industry is highly based on recycling and respond to the Circular Economy objectives. For instance, our company relies for xxx - xxx % on recycled brass.</li> <li>- This prevents any uncontrolled release of lead since products reaching the end-of-life stage return to the production loop where environmental releases are fully controlled through the Industrial Emissions Directive which is currently under revision as part of the European Green Deal.</li> <li>- Further, lead emissions resulting from industrial uses in the EU have drastically decreased during the last decades. Indeed, according to the International Lead Association (ILA), the European Pollutant Release and Transfer Register (E-PRTR) data indicates, emissions of lead to air reduced by 88% while emissions to water reduced by 80% between 2007-2020.</li> </ul> <p>Workers exposure</p> <p>Workers exposure is controlled through workers safety legislation which is also under review:</p> <ul style="list-style-type: none"> <li>- The Chemicals Agents Directive (CAD) which is currently under revision in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027 which have set ambitious targets to further protect workers from risks at the workplace and with the objective to reach a Zero approach to work-related deaths in the EU.</li> <li>- The Carcinogens and Mutagens Directive (CMD) which has recently been amended and includes limits for inorganic lead and its compounds as well as biological limit and health surveillance measures which will reinforce the protection of workers from potential exposure to lead.</li> <li>- We further note that the next Draft Annex XIV amendment currently under preparation (<a href="https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en</a>) addresses seven lead compounds for which the Commission is still considering appropriate to postpone its decision due to the current review of the CAD.</li> </ul> <p>Consumers exposure</p> <ul style="list-style-type: none"> <li>- Finally, potential releases of lead from finished articles are not expected as these products are coated for corrosion protection avoiding all exposure of consumers to brass.</li> </ul> <p>Drinking water regulations</p> <ul style="list-style-type: none"> <li>- Potential migration to drinking water is well controlled through the recently revised Drinking Water Directive which sets more stringent safety limits for lead in potable water.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- For lead, the revised Directive introduces a more stringent limit than the one currently recommended by WHO. More importantly, substitution whenever technically and economically feasible is addressed in the revised Directive under Article 10.3(f).</li> <li>- The revision includes now a review mechanism that will involve ECHA and RAC and that resemble the authorisation process. ECHA is now involved in the process of setting European positive lists of authorised substances for the manufacture of materials in contact with drinking water.</li> <li>- A review mechanism is foreseen, whereby each entry on the positive lists will be assorted with an expiry date requiring companies who wish to maintain the use of a substance to send a review application by the set expiry date. The Committee for Risk Assessment (RAC) will review applications and issue opinions that should allow Commission to decide if an entry should be kept, amended or removed from the positive lists.</li> <li>- The sanitary appliances sector adheres strictly to these regulations to ensure protection of its workers, consumers and the environment.</li> <li>- To that purpose, national drinking water organisations, like KIWA in the Netherlands and DVGW in Germany, regularly conduct product and production audits in sanitary companies.</li> <li>- We believe that all these elements should be considered in the prioritisation process and that postponing the recommendation for lead based on ongoing work on other regulatory processes is justified.</li> </ul>	
		<i>Confidential attachment removed</i>	
3860 2022/04/27	Individual, Belgium	<p>een korte samenvatting uit brochure Rijksdienst voor de Monumentenzorg Nederland: de loodvatting maakt een wezenlijk deel uit van een gebrandschilderd glas in lood raam in kerken, kathedralen, basilieken enz en dit eeuwenoude kunstambacht is geëvolueerd naar een volwaardige kunstuiting waar het gebruik van lood niet langer louter als een bindende functie wordt beschouwd maar als een belangrijk aspect van de compositie.</p> <p>Cécile Van Beeck, restaurateur gebrandschilderd glas in lood</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
3861 2022/04/27	ACRE, Other contributor, Spain	<p><a href="#">3861_CARTA VIDRIERAS PLOMO.pdf</a></p>	Please see response to comment #

			3585
3862 2022/04/27	Individual, France	<a href="#">3862_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3863 2022/04/27	Individual, France	<a href="#">3863_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
3864 2022/04/27	SARL VITRAUX MAX &CO, Company, France	<a href="#">3864_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3866 2022/04/27	van veerdegem-vosch sprl, Company, Belgium	<a href="#">3866_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3867 2022/04/27	carpe diem arts verriers, Company, Belgium	<a href="#">3867_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
3868 2022/04/28	JLA VITRAIL, Company, France	<a href="#">3868_2022.04.25. - CNSV - Réponse consultation ECHA Contribution Anglais.pdf</a>	Please see response to comment # 3862
3869 2022/04/28	Individual, Belgium	<a href="#">3869_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3870 2022/04/28	Individual, Germany	lead and lead-containing materials in the preservation, conservation, restoration, storage, display and active use of historic artifacts, especially objects of our technical cultural heritage <a href="#">3870_Lead_ECHA.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio- economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for</b>

			<p>handling finished articles or historic artefacts</p> <p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
3871 2022/04/28	IBEDA Sicherheitsgeräte und Gastechnik GmbH & Co. KG, Company, Germany	<p>see attachment</p> <p><a href="#">3871. Stellungnahme zur ECHA-Empfehlung Blei in REACH Anhang XIV aufzunehmen.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation /</b></p>

			<p><b>drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
3872 2022/04/28	Individual, Poland	<p>Lead "ban" will ruin shooting sports, where no real, good quality alternative for lead ammo (ex. in airgun pellets and sporting ammunition) is available. What's more, most lead from firing ranges is recycled on regular bases. In regard of hunting ammunition, the lead bullet core stays within killed animal, so there is no pollution. There are also no scientific evidence that single metal lead fragments impact environment in any real way. What's more, iron and other metal processing technology already filters lead residuals - quite effective as far as I know. Motorisation companies drift towards LiPo materials anyway, but car batteries now are recycled with good outcomes. In conclusion, lead ban will ruin shooting sports, which generates good tax income, with no real-life benefits.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p>
3873 2022/04/28	Leenders Glas in Lood,	Ons bedrijf kan alleen voortbestaan als wij met lood kunnen werken. Monumentale glas in lood ramen kunnen alleen gerestaureerd worden met lood.	

	Industry or trade association, Netherlands	<a href="#">3873 Voorbeeldbrief aan ECHA Europese commissie (1) (005).docx</a>	Please see response to comment # 3585
3874 2022/04/28	Ademco 1 GmbH, Mosbach, Company, Germany	We, as manufacturer of fittings and valves for heating appliances and potable water installations, use brass - with very low lead content according to the UBA-positiv list - to produce housing parts in our in-house foundry. The usage of leaded brass is limited to this industrial usage. The lead content in the brass material is very low and industrial workers are not exposed to lead. Customers are not exposed to the lead because they are not in contact with the brass material and the migration of lead to the water is limited and approved by UBA and using UBA-listed material the limit of the new drinking water directive for lead in water will not be reached. The drinking water directive is mandatory for all manufacturers inside the EU and also from outside the EU. REACH is not mandatory for manufacturers from outside the EU, which will for sure change the competitiveness of the manufacturer and supplier.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b>
3875 2022/04/28	ICOMOS Denmark, National NGO, Denmark	See attached file <a href="#">3875 ECHA's plan to include lead in the list of substances subject to authorisation_ICOMOS DK.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>

			<b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs C.1.3. Aspects not justifying an exemption from authorisation</b>
3876 2022/04/28	Ateliers Jean Salmon, Company, France	<a href="#">3876_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Français.pdf</a>	Please see response to comment # 3862
3877 2022/04/28	VDMA Schweiß- und Druckgastechnik I VDMA Welding and Pressure Gas Equipment, Industry or trade association, Germany	s. attachment <a href="#">3877_VDMA SDG Statement ECHA Lead 202204_25.pdf</a>	Please see response to comment # 3871
3878 2022/04/28	Individual, France	Dans le Vitrail, le matériau plomb, coulé, étiré ou déformé à froid sous forme de baguettes de plomb ou de plomb laminé, est un élément irremplaçable et essentiel dans la fabrication et la restauration des vitraux. Fixé à ses points d'intersection avec le métal d'apport, il forme une structure de base solide et durable, capable de supporter des verres colorés et peints. La toxicité du plomb est bien connue et ses risques pour la santé sont gérés efficacement par les artistes, les transformateurs et les restaurateurs professionnels de vitraux du monde entier. L'utilisation, entre autres, de systèmes d'aspiration, d'équipements de protection individuelle (EPI) appropriés et de tests sanguins réguliers permet aux milliers de personnes qui travaillent dans ce secteur de le faire en toute sécurité et avec un risque minimal et soigneusement contrôlé.	Please see response to comment # 3585
3879 2022/04/28	J H Porter & Son Ltd, Company, United Kingdom	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.4. Control of risks A.1.5.5. Availability of suitable alternatives</b>

			<b>A.1.5.6. Socio-economic benefits of continued use C.1.3. Aspects not justifying an exemption from authorisation</b>
3881 2022/04/28	Individual, Germany	<a href="#">3881_220427_vdr_blei_ECHA.pdf</a>	Please see response to comment # 3585
3882 2022/04/28	Individual, Germany	<a href="#">3882_ban_on_lead.pdf</a>	Please see response to comment # 3740
3883 2022/04/28	Verre Claire, Other contributor, France	<a href="#">3883_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3884 2022/04/28	FRANCE VITRAIL INTERNATIONAL , Company, France	<a href="#">3884_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3885 2022/04/28	Individual, France	<a href="#">3885_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3886 2022/04/28	Individual, France	<a href="#">3886_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3887 2022/04/28	Individual, France	<a href="#">3887_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	



			Please see response to comment # 3862
3888 2022/04/28	Keramikerinnung Bayern, Ceramist Guild Bavaria, Industry or trade association, Germany	<a href="#">3888 Stellungnahme Bleiverbot.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3889 2022/04/28	Francéclat, FITHM, BOCI and UFBJOP, Industry or trade association, France	Please refer to the attached document <a href="#">3889 ECHA's draft recommendation for inclusion of lead in the Authorisation List.pdf</a>	Please see response to comment # 3752
3890 2022/04/28	Individual, France	<a href="#">3890_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3891 2022/04/28	Hansgrohe SE, Company, Germany	Please refer to the document submitted below where this question is answered in detail <a href="#">3891_2022-04-26 ECHA, lead, Hansgrohe EN Public.pdf</a> <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

			<p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b> <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p>
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			<p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b></p> <p><b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b></p> <p><b>B.2.03 Joined AfAs result in shorter review periods</b></p> <p><b>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an</b></p>
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			<b>exemption from authorisation C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
3892 2022/04/28	Individual, Belgium	<a href="#">3892_xxx.docx</a>	Please see response to comment # 3585
3893 2022/04/28	Individual, France	<a href="#">3893_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3894 2022/04/28	Atelier Veyrier du Muraud, Company, France	<a href="#">3894_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3895 2022/04/28	ATELIER BOEL, Company, France	<a href="#">3895_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3896 2022/04/28	Individual, France	<a href="#">3896_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3897 2022/04/28	Individual, France	<a href="#">3897_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3898 2022/04/28	Individual, France	<a href="#">3898 lettre consultation plomb Ateliers d'Art de France.pdf</a>	

			Please see response to comment # 3805
3899 2022/04/28	SARL LES MAITRES VERRIERS RENNAIS, Company, France	<a href="#">3899_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3900 2022/04/28	Individual, Poland	Lead in ammunition used on shooting range is confined within border of the shooting range. Banning lead for ammunition uswd on ranges will bring only vastly negative social-economic results, that will be catatrophic for any gun owner, wheter a spotsman, collector, hunter, and little, if any, positives.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3901 2022/04/28	Individual, France	<a href="#">3901_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3902 2022/04/28	Lëtzebuerger Denkmalschutz Federatioun asbl, National NGO, Luxembourg	<a href="#">3902_European Chemicals Agency (ECHA).docx</a>	Please see response to comment # 3585
3903 2022/04/28	Individual, France	<a href="#">3903_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3904 2022/04/28	Individual, France	<a href="#">3904_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3905 2022/04/28	Individual, France	<a href="#">3905_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a>	

		<i>Confidential attachment removed</i>	Please see response to comment # 3862
3906 2022/04/28	Individual, France	<a href="#">3906_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3907 2022/04/28	Individual, France	<a href="#">3907_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3908 2022/04/28	Individual, France	<a href="#">3908_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3909 2022/04/28	Individual, United Kingdom	This is a disastrous proposition to the art and craft of stained glass. This is a proposal that will destroy and sweep away a centuries old craft. The idea that to practice the making and restoration of stained glass special permissions will be needed. Are you going to ban painters and artists from using certain paints for safety reasons- for example white because it has lead in it. I cannot believe that you as an organization propose the destruction of an art, craft, skill and industry.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3910 2022/04/28	Ondernemers Vereniging van Glazeniers, Industry or trade association, Netherlands	<a href="#">3910_OVG aan ECHA.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
3911 2022/04/28	Individual, United Kingdom	Appeal for Derogation in Respect of proposed EU Regulations on the Use of Lead which would prevent stained glass artists and stained glass conservators from practicing their profession and thereby pose a threat to the future of our Stained Glass Patrimony [REACH Annex XIV, EC Number 231-100-4] Lead, cast, milled or extruded into lead comes or strips, is an indispensable and intrinsic	Please see response to comment # 3585

		<p>component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), Brussels and Antwerp cathedrals (Belgium), Canterbury Cathedral and York Minster (United Kingdom), Leon and Girona Cathedrals (Spain), the National Cathedral, Washington DC (USA), and is among the greatest treasures of museums including the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow) to name but a few. While leaded stained glass grew to cultural prominence in medieval Europe and enjoyed a massive revival in the nineteenth century, it is now practiced all over the world and has attracted modern artists of the international stature of Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke and Narcissus Quagliata. Its malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the historic windows of our heritage sites and museums could not be repaired, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form. The toxicity of lead is well-understood and its risks to health are effectively managed by stained glass designers, fabricators and conservators all over the World. Regular blood testing, use of extraction and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk. We strongly urge the European Commission to exclude the use of lead in the fabrication and conservation of stained glass from its proposed ban. Not only would this ban wipe out the livelihoods of artists in glass, craftspeople involved in fabrication and conservators involved in the care of heritage assets in Europe, but its effects would be felt throughout the world, sealing the eventual death sentence of one of the most glorious art forms known to mankind.</p>	
<p>3912 2022/04/28</p>	<p>Individual, France</p>	<p><a href="#">3912_2022.04.25. - CNSV - Rf@ponse consultation ECHA - Contribution Anglais.pdf</a></p>	

			Please see response to comment # 3862
3913 2022/04/28	Individual, France	<a href="#">3913_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3914 2022/04/28	LVR-Fachbereich Regionale Kulturarbeit, Regional or local authority, Germany	<a href="#">3914_ECHA-Finland.pdf</a>	Please see response to comment # 3585
3915 2022/04/28	Individual, France	<a href="#">3915_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3916 2022/04/28	Individual, France	<a href="#">3916_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3917 2022/04/28	Individual, France	<a href="#">3917_2022.04.25. - CNSV - Réponse con sultation ECHA - Contribution An glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3918 2022/04/28	Museum am Rothenbaum, Künste und Kulturen der Welt, Other contributor, Germany	<a href="#">3918_Anfrage zur Ausnahme ECAH_2022 .docx</a>	Please see response to comment # 3740
3919 2022/04/28	Atelier Vitrail France, Company, France	<a href="#">3919_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3920 2022/04/28	Individual, France	<a href="#">3920_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	



			Please see response to comment # 3862
3921 2022/04/28	Rostock Museum for Culture and history (Kulturhistorisches Museum Rostock), Regional or local authority, Germany	<a href="#">3921_xR45HM003.A45.RHS.ADMINHRO_220428-112020-150b.pdf</a>	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>
3922 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">3922_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3923 2022/04/28	Individual, France	<a href="#">3923_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution An_glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3924 2022/04/28	Individual, France	<a href="#">3924_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution An_glais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3925 2022/04/28	Bund Deutscher Orgelbaumeister e. V. (BDO), Industry or trade association, Germany	We see no need to restrict the processing of lead in pipe organs by including it in Annex XIV of the REACH Regulation. The lead bound in alloys in the finished products does not pose any risk to the "end users" (musicians and audience), as they have no contact with it. Occupational health monitoring and safety measures for the production of metal pipes are already regulated by existing legal provisions, recognised by the European Commission as controlling risks. The blood tests that have been ordered for decades, e.g. by the German Employers' Liability Insurance Association, have not yet found any indications of exposure above the valid limit values, partly because the melting temperatures of 300 to 350 degrees Celsius are still far below the critical threshold for the release of lead vapours (approx. 480°C). There are no negative effects on the environment because of the extremely long periods of use of the pipe organs and the closed recycling systems. <a href="#">3925_Lead-on-REACH_Statement_Association-of-German-Organ-Builders.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>

			<p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p>
3926 2022/04/28	Individual, France	<p><a href="#">3926_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> Confidential attachment removed</p>	Please see response to comment # 3862
3927 2022/04/28	Individual, France	<p><a href="#">3927_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> Confidential attachment removed</p>	Please see response to comment # 3862
3928 2022/04/28	Individual, France	<p><a href="#">3928_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> Confidential attachment removed</p>	Please see response to comment #

			3862
3929 2022/04/28	Individual, France	<a href="#">3929_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3930 2022/04/28	UNION DES ENTREPRISES DE PROXIMITE (U2P), Trade union, France	<a href="#">3930_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3931 2022/04/28	Individual, France	<a href="#">3931_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3932 2022/04/28	Individual, France	<a href="#">3932_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3933 2022/04/28	Individual, France	<a href="#">3933_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3934 2022/04/28	mustarts, Company, France	<a href="#">3934_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825_(7).zip</a>	Please see response to comment # 3862
3935 2022/04/28	Individual, France	<a href="#">3935_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3936 2022/04/28	Vitraux Flores, Company, Belgium	<a href="#">3936_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
3937 2022/04/28	Individual, Switzerland	<a href="#">3937_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3938 2022/04/28	atelier vitrail du chambon, Company, France	<a href="#">3938_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825(1).zip</a>	Please see response to comment # 3862
3939 2022/04/28	Individual, France	Interdire I	Thank you for your opinion.
3940 2022/04/28	Individual, Netherlands	<a href="#">3940_220428 ECHA - objection signed.pdf</a>	Please see response to comment # 3585
3942 2022/04/28	Forschungsstelle DIGITAL ORGANOLOGY am Musikinstrumentenmuseum der Universität Leipzig, Academic institution, Germany	<a href="#">3942_ECHA_20220428.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> <b>C.1.2. Generic exemptions</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>

			<b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b>
3944 2022/04/28	Jan Matejko Academy of Fine Arts in Krakow, Academic institution, Poland	Lead is important material for stained glass conservators, designers and fabricators. As a Faculty of Conservation and Restoration of Works of Art we teach students sensitivity to the works of bygone epochs, as well as methods of protecting and preserving our cultural heritage. Stained glass windows are the most glorious and extraordinary part of that heritage. Without access to lead won't be possible to preserve historic windows, and thus all of them will eventually perish. <a href="#">3944_scan_comment_letter.pdf</a>	Please see response to comment # 3585
3945 2022/04/28	Individual, France	<a href="#">3945_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3946 2022/04/28	Individual, Russian Federation	<a href="#">3946_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3947 2022/04/28	Justus-Liebig-Universität Giessen, Academic institution, Germany	Lead in rifle bullets (bullet, not buckshot)  The shot channel is cleanly prepared out after shooting  Metallic lead is hardly bioavailable in the gastrointestinal tract of humans  The average daily intake of game meat in Germany is only three to five grams per day  The killing effect of lead-free rifle bullets is unsatisfactory and causes suffering to the game  The ban on lead in rifle bullets would therefore not be communicated  <a href="#">3947_Lead.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>
3950 2022/04/28	National Heritage Institute, National Authority, Czech Republic	<a href="#">3950_Exemption request for the use of lead.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

			<b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
3951 2022/04/28	Individual, France	<a href="#">3951_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3952 2022/04/28	vincent pascal, Company, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
3953 2022/04/28	Luminescence-Vitraux, Company, France	<a href="#">3953_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3954 2022/04/28	ABB Sp. z o.o., Company, Poland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"</p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 4239
3955 2022/04/28	Individual, Malta	I believe that the EU will further damage the already declining jewellery enamelling sector if it makes the use of lead based enamel more difficult.	

		<p>Highly trained jewellers use vitreous glass to enamel gold and silver. This is a dying skill in Europe and needs to be encouraged. Leaded enamel powders have been used for centuries because they offer accurate and pure depths of colour.</p> <p>Lead-free enamels are being developed but they are still not good enough in some colour ranges. Red, for example, can still only really be achieved using leaded enamel.</p> <p>It is not possible to combine lead-free and leaded enamel on the same piece of jewellery.</p> <p>I firmly believe that you will be harming the jewellery sector if regulations are introduced.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
3956 2022/04/28	Gesamtverband Messing Sanitär, Industry or trade association, Germany	<p>Due to many already existing Regulations our industry has been working towards reducing lead as much as possible, new clean materials have been developed and introduced. This concerns e.g. Drinking Water materials, compliance to Safety laws for production etc...</p> <p>Because of the many investments already done by our industry, we are glad that more clear regulation brings legal certainty, but shall organize a level playing field for EU and non-EU manufacturers. In the way the Lead Authorization is defined, lead containing materials can be imported from outside the EU which replaces our industry. This again increases dependence from abroad which is an important issue in the mean while and European Union would lose competitiveness and know how in this industry.</p> <p>We also refer to the recycling of copper alloy materials which still contain lead. This is a very important source of raw material for the EU. The new Regulations should take into account to have a sustainable solution that existing material circularity can be sustained in the future.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p>
3957 2022/04/28	Liberty Stained Glass Conservation, Company, United States of America	<p><a href="#">3957_1 EN stained glass and lead letter.pdf</a></p>	Please see response to comment # 3585
3958 2022/04/28	La Cabane du Vitrail, Company,	<p><a href="#">3958_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	

	France		Please see response to comment # 3862
3959 2022/04/28	Individual, France	<a href="#">3959_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3960 2022/04/28	DES IDEES EN VERRE, Company, France	<a href="#">3960_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3961 2022/04/28	Individual, France	<a href="#">3961_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3962 2022/04/28	Confédération Française des Métiers D'Art , Trade union, France	<a href="#">3962_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3963 2022/04/28	Terre de verre, Company, France	<a href="#">3963_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3964 2022/04/28	glaswerkstatt-s, Company, Germany	<a href="#">3964_CCF_000343.pdf</a>	Please see response to comment # 3585
3965 2022/04/28	Glasmuseum Wertheim e.V., Other contributor, Germany	Glasmuseum Wertheim * Mühlenstraße 24 * 97877 Wertheim An die European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finland 28. April 2022	Please see response to comment # 3585



Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalereirestauratoren

Sehr geehrte Damen und Herren, sehr geehrte Frau Mariya Gabriel,  
das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.  
Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.  
Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.  
Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall,

Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüppertz und Gerhard Richter begeistert.  
Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.  
Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher

		<p>Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen</p> <p>Heike Baumann Museumsleiterin</p>	
		<i>Confidential attachment removed</i>	
3966 2022/04/28	Fédération du cristal et du verre , Trade union, France	<a href="#">3966_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3967 2022/04/28	Bundesverband Deutscher Steinmetze, Industry or trade association, Germany	<p>This comment refers only to the use within the skilled crafts sector - especially the stonemasonry craft. Since many other crafts (e.g. stained glass, church painting, gilders, metalworkers, roofers, plumbers, builders' lodges, etc.) and, on the whole, institutional conservation authorities with its project-specific conservation and restoration concepts are affected, a uniform approach for the entire craft is certainly expedient.</p> <p>Especially in the artisanal preservation (one of the main sectors of the stonemasonry craft in Germany, along with the gravestone and construction sectors), the working and processing of lead and lead products has always been an essential part of professional practice and thus also of vocational training and continuing education (cf. relevant examination regulations and framework curricula).</p> <p>The working and processing of lead is not only carried out by the executing craft with a long tradition, but is also - as before - regularly part of the planning and restoration concept for specialist planners and institutional preservation authorities. The reason for this is that an essential aspect of modern monument preservation is the use of as many of the same building</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b></p> <p><b>A.2.23 Authorisation requirement for</b></p>

		<p>materials as possible, as well as the same construction methods as were used in the creation of the building components in the past. (Cf. Venice Charter, etc.).</p> <p>A first and not complete overview of the activities of the stonemasonry craft in Germany with regard to the use of lead:</p> <ul style="list-style-type: none"> <li>- Joint grouting with lead (e.g. between massive workpieces)</li> <li>- Joint sealing with lead by mortising (e.g. between massive workpieces)</li> <li>- Lead coverings</li> <li>- Lead as a connecting and dowelling agent</li> <li>- Lead lettering (e.g. for gravestones)</li> <li>- Material for lettering and design objects</li> </ul> <p>The material "lead" cannot be adequately replaced by other building materials in the context of artisanal preservation, not least because of its good technical properties in terms of formability and durability. The use of lead in the context of historic preservation is also mostly dictated by the institutional preservation authorities.</p> <p>Institutional preservation authorities all of which operate on the basis of the relevant charters are found in every Member State and EU-wide standardization takes place in several CEN-TC's. (e.g. CEN/TC 346 "Conservation of Cultural Heritage").</p> <p>The classification of lead as subject to application-related approval would have serious consequences for the stonemasonry craft in Germany, since such special approvals can certainly only be obtained with a high financial, organizational and legal effort, which the SMEs cannot afford.</p> <p>The globally coordinated approach (including UNESCO) to the preservation of cultural heritage would no longer be feasible in practice in parts, as historically used building materials could no longer be used.</p>	<p><b>production of spare parts and repair of existing articles</b>  <b>C.2.08 Exempt use in art and building sector</b></p>
3968 2022/04/28	verra carlota, Company, France	<p><a href="#">3968_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>  <i>Confidential attachment removed</i></p>	Please see response to comment # 3862
3969 2022/04/28	Individual, France	<p><a href="#">3969_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution.pdf</a></p>	

			Please see response to comment # 3862
3970 2022/04/28	Atelier LE BLOAS, Arts du vitrail et de la laque , Company, France	<a href="#">3970_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3972 2022/04/28	pauline galindo vitrail, Company, France	<a href="#">3972_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3973 2022/04/28	Vereinigung der Landesdenkmalpfleger in der Bundesrepublik Deutschland, National Authority, Germany	<a href="#">3973_VDL_Stellungnahme_BRPH_26.05.2021_RD.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3974 2022/04/28	Confederatie Bouw - Aannemers van glaswerken, Industry or trade association, Belgium	<a href="#">3974_CB_glaswerken1.pdf</a>	Please see response to comment # 3585
3975 2022/04/28	Confédération Construction - Entrepreneurs de vitrage, Industry or trade association,	<a href="#">3975_CC_vitriers_1.pdf</a>	Please see response to comment #

	Belgium		3585
3976 2022/04/28	Mad'in Europe, Company, Belgium	<a href="#">3976_Stained glass and lead template letter.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
3977 2022/04/28	Individual, Belgium	<a href="#">3977_Jan Jacobs1.pdf</a>	Please see response to comment # 3585
3978 2022/04/28	Individual, Belgium	<a href="#">3978_AGC1.pdf</a>	Please see response to comment # 3585
3979 2022/04/28	Individual, France	<a href="#">3979_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3980 2022/04/28	Peterborough Cathedral, Regional or local authority, United Kingdom	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3981 2022/04/28	Individual, Belgium	<a href="#">3981_Foubert1.pdf</a>	

			Please see response to comment # 3585
3982 2022/04/28	Individual, Belgium	<a href="#">3982_Gijbels Glas1.pdf</a>	Please see response to comment # 3585
3983 2022/04/28	Individual, Belgium	<a href="#">3983_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3984 2022/04/28	Individual, Belgium	<a href="#">3984_Hermans1.pdf</a>	Please see response to comment # 3585
3985 2022/04/28	ICOMOS-UK , National NGO, United Kingdom	No comment <a href="#">3985_20220427_ECHA_Lead_ICOMOSUK_final.pdf</a>	Please see response to comment # 3875
3986 2022/04/28	Individual, Belgium	<a href="#">3986_Renover1.pdf</a>	Please see response to comment # 3585
3987 2022/04/28	Individual, Belgium	<a href="#">3987_Vloebergsglas1.pdf</a>	Please see response to comment # 3585
3988 2022/04/28	Maison De L'Imprimerie, Other contributor, Belgium	Maison de l'Imprimerie, asbl (musée sur l'imprimerie typographique) Le 28 avril 2022  À l'attention de: Monsieur Shay O'Malley Directeur exécutif par intérim Agence européenne des produits chimiques (ECHA)	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>

		<p>P.O. Box 400 FI-00121 Helsinki Finlande</p> <p>Mme Mariya Gabriel Commissaire à l'innovation, à la recherche, à la culture, à l'éducation et à la jeunesse Commission européenne Rue de la Loi / Wetstraat 200 1049 Brussels Belgium cab-gabriel-contact@ec.europa.eu</p> <p>Objet : Le projet de l'ECHA d'inclure le plomb dans la liste des substances soumises à autorisation (Annexe XIV du Règlement REACH)</p> <p>Madame Gabriel, Monsieur O'Malley,</p> <p>La Maison de l'Imprimerie exprime sa vive préoccupation concernant le projet de l'Agence européenne des produits chimiques (ECHA) d'inclure le plomb dans l'annexe XIV (liste des substances soumises à autorisation) du règlement REACH. Cela constituerait non seulement une menace majeure pour la conservation, l'entretien, la présentation et même la création d'un grand nombre d'objets d'art et de culture, mais détruirait également les moyens de subsistance d'innombrables conservateurs-restaurateurs, artisans et artistes, et engendrerait un appauvrissement économique, culturel et social à grande échelle.</p> <p>Le plomb est essentiel à une multitude de secteurs du patrimoine culturel, entre autres, la fabrication d'orgues (production et réparation de tuyaux d'orgue); la taille de pierre classique (matériau de remplissage entre les pierres, couverture des appuis et des corniches en pierre et des joints en fer des pierres); et les toitures historiques. Les musées et les institutions patrimoniales conservent une large gamme de biens culturels contenant du plomb, pour n'en citer que quelques-uns : le plomb dans la sculpture en bronze, les conduites d'eau romaines en plomb, les sarcophages en plomb du haut Moyen Âge, les insignes médiévaux des pèlerins en étain plombé, jouets, articles ménagers (assiettes, tasses, bougeoirs...), poids médiévaux pour filets (pêche) et tissus de pilotes (textiles), restes d'activité industrielle (scories métalliques), matériel médico-militaire utilisé pour arrêter les radiations (tabliers, valises...), les émaux au plomb sur la céramique, le verre au plomb, le blanc de plomb dans la peinture, les pièces de monnaie, les médailles ou les poids, ainsi que les types d'impression ou d'autres éléments d'impression. Cependant, l'art du vitrail en particulier et la restauration du vaste patrimoine européen allant des vitraux historiques médiévaux aux créations modernes seraient gravement</p>	<p><b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b> <b>A.2.36 Attached COM questionnaire</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p>Please see response to comment # 3875</p>
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		<p>menacés par l'inclusion du plomb parmi les substances nécessitant une autorisation d'utilisation ou de manipulation.</p> <p>Le plomb, coulé, fraisé ou extrudé en cames ou bandes de plomb, est un élément indispensable et intrinsèque dans la fabrication et la conservation du vitrail. Fixé à ses intersections avec de la soudure, il crée une matrice solide et durable qui supporte le verre coloré et peint. Il s'agit d'une forme d'art dont l'histoire est millénaire, et implantée dans des sites patrimoniaux mondialement connus tels que les cathédrales de Chartres, Notre Dame de Paris et de Strasbourg (France) ; les cathédrales de Cologne et de Naumburg (Allemagne) ; les cathédrales de Bruxelles et d'Anvers (Belgique) ; la cathédrale de Canterbury et d'York (Royaume-Uni) ; les cathédrales de Léon et de Gérone (Espagne) et la cathédrale nationale de Washington DC (États-Unis). Le vitrail fait partie des plus grands trésors des musées dont le Victoria and Albert Museum (Londres), le Metropolitan Museum (New York), le Schnuetgen Museum (Cologne) et la Burrell Collection (Glasgow) pour n'en citer que quelques-uns. Alors que le vitrail au plomb a pris une importance culturelle dans l'Europe médiévale et a connu un renouveau massif au XIXe siècle, il est maintenant utilisé dans le monde entier et a attiré des artistes modernes de stature internationale comme Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke et Narcissus Quagliata.</p> <p>La malléabilité, la résistance et la durabilité du plomb au fil des siècles signifient que ses caractéristiques uniques sont restées irremplaçables en tant que partie intégrante de la fabrication du vitrail. Sans le plomb, les vitrines historiques de nos sites patrimoniaux, musées et maisons historiques ne pourraient être restaurées, conservées et préservées, ce qui le rend indispensable à la pérennité et à la préservation de cette forme d'art unique. Il ne peut pas non plus être remplacé par des matériaux alternatifs dans les autres secteurs patrimoniaux mentionnés ci-dessus.</p> <p>La toxicité du plomb est bien connue et ses risques pour la santé sont très bien maîtrisés par les concepteurs, fabricants et conservateurs-restaurateurs de vitraux du monde entier. Des tests sanguins réguliers, l'utilisation d'un système d'extraction avec une microfiltration appropriée et un équipement de protection individuelle (EPI) adapté garantissent que les milliers de personnes travaillant dans la profession le font en toute sécurité et avec un risque minimal et bien atténué. C'est également le cas des professionnels du patrimoine des autres secteurs mentionnés ci-dessus.</p> <p>La Maison de l'Imprimerie demande instamment à l'ECHA et à la Commission européenne d'exclure l'utilisation du plomb dans la fabrication, la conservation et la restauration de vitraux et d'autres biens culturels de son interdiction proposée. Il est nécessaire d'établir une réglementation officielle et permanente selon laquelle l'art et la production de vitraux en particulier, mais aussi l'utilisation et la manipulation du plomb dans d'autres secteurs du</p>	
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		<p>patrimoine culturel, sont définitivement retirés de la liste ou bénéficient d'une exemption permanente de la Réglementation de l'UE sur les produits chimiques ainsi que toutes les directives sur les substances dangereuses (par exemple 2011/65/UE).</p> <ul style="list-style-type: none"> <li>• Le plomb est indispensable pour l'art du vitrail, sa création, sa conservation et sa restauration, ainsi que dans une multitude d'autres secteurs du patrimoine culturel ;</li> <li>• Les moyens efficaces d'exclure les dangers du plomb dans ce domaine sont bien connus des professionnels qui le manipulent ;</li> <li>• La quantité de plomb mise en circulation dans le domaine de la restauration, de la conservation et de la nouvelle création de vitraux, et du secteur du patrimoine culturel en général, est négligeable ;</li> <li>• Les conséquences de son interdiction sur le patrimoine culturel européen seraient d'une gravité inconcevable.</li> </ul> <p>Non seulement une interdiction anéantirait les moyens de subsistance des artistes du verre, des artisans impliqués dans sa fabrication et des conservateurs-restaurateurs impliqués dans l'entretien des biens patrimoniaux en Europe, mais ses effets se feraient sentir dans le monde entier, scellant la condamnation à mort de l'une des formes d'art les plus glorieuses connues de l'humanité. Il n'y a presque aucune partie du secteur du patrimoine culturel qui ne serait pas gravement touchée par l'inclusion du plomb parmi les substances nécessitant une autorisation d'utilisation ou de manipulation.</p> <p>Veillez agréer, Madame Gabriel et Monsieur O'Malley, l'expression de ma/notre très haute considération.</p> <p>Ludivine Onuczak Directrice de la Maison de l'Imprimerie, asbl Rue Verte 1b 6530 Thuin Belgique</p>	
		<a href="#">3988_recom_com_call_for_info_questionnaire_en Questionnaire plomb.docx</a>	
3989 2022/04/28	ICOMOS-UK, National NGO, United Kingdom	No comment <a href="#">3989_20220427_ECHA_Lead_ICOMOSUK_final.pdf</a>	Please see response to comment # 3875
3990 2022/04/28	Individual, France	<a href="#">3990_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
3991 2022/04/28	Glasfachschule Zwiesel - Staatliches Berufliches Schulzentrum für Glas, Other contributor, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
3992 2022/04/28	Individual, Belgium	<a href="#">3992_KockenA.pdf</a>	Please see response to comment # 3585
3993 2022/04/28	La Maison du Vitrail, Company, France	<a href="#">3993_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
3994 2022/04/28	Crea.Plan GmbH, Company, Germany	<a href="#">3994_Helsinki.pdf</a>	Please see response to comment # 3585
3995 2022/04/28	STEF VALENTI, Company, France	<a href="#">3995_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3996 2022/04/28	STEF VALENTI, Company, France	<a href="#">3996_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3997 2022/04/28	Individual, France	<a href="#">3997_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
3999 2022/04/28	Individual, France	<a href="#">3999_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

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4000 2022/04/28	Individual, France	<a href="#">4000_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4001 2022/04/28	Individual, France	<a href="#">4001_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4002 2022/04/28	ABB Oy, Company, Finland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.</p> <p>For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"</p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 4239
4003 2022/04/28	Office of the President of the Czech Republic, National Authority, Czech Republic	<p>Prague, April 22, 2022</p> <p>To Whom It May Concern:</p> <p>According to the latest information, the European Chemicals Agency (ECHA) prepares a new classification of toxic substances where lead would be subject to a special authorisation (proposed EU regulation: annex XIV of the REACH regulation No EC 231-100-4). The Office of the President of the Czech Republic would like to use this opportunity to express concerns about the consequences of such a measure which in practice could cause a threat to the European cultural heritage.</p> <p>Lead has been used for centuries as a traditional material for large structures, especially cathedrals, where it served as a roofing, waterproofing, watering of metal structural elements</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>

		<p>and exposed joints, and as a material for a structural network of stained-glass windows. The ductility, strength and durability of lead cannot be replaced by other or modern materials. Traditional technological processes and materials are also used in today 's restoration of historical monuments. An example of this is the Prague Castle which is a national cultural monument as well as a part of a UNESCO world heritage site. We are bound by UNESCO conventions to care for preservation cultural property, and if the use of lead was excluded, we would be forced to break the UNESCO convention.</p> <p>We therefore call on the European Chemicals Agency and the European Commission to exempt from the proposed ban on use of lead for the preservation, renovation, restoration and presentation of historic building monuments, artistic and cultural objects.</p> <p>Above this fundamental position, we understand that the management of lead must be, of course, subject to regulations and strict measures to minimise the health risks of all artisans, restorers and artists who work with this toxic material.</p> <p>We hope that the above-mentioned arguments will be considered when making the decision and the threat of cultural European heritage will not occur; after all, preserving it is one of the declared priorities of the European Union.</p> <p>Sincerely,</p> <p>Vratislav Mynář Head of the Office of the President of the Czech Republic</p> <p>European Chemicals Agency P.O.Box 400 00121 Helsinki Finland</p> <p><a href="#">4003_zakova_220427-131104-38d.pdf</a></p>	<p><b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.08 Exempt use in art and building sector</b></p>
4004 2022/04/28	Individual, France	<p><a href="#">4004_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4005 2022/04/28	Individual, France	<p><a href="#">4005_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4006	ATELIER STAINED GLASS,		

2022/04/28	Company, France	<a href="#">4006_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4007 2022/04/28	Individual, France	<a href="#">4007_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4008 2022/04/28	Renaissance du Vieux-Lyon, National NGO, France	<a href="#">4008_2022.04.25.-CNSV-ReponseconsultationECHA.pdf</a>	Please see response to comment # 3862
4010 2022/04/28	vitraux d'Isabeau, Other contributor, France	<a href="#">4010_Sans nom 1.pdf</a>	Please see response to comment # 3862
4011 2022/04/28	FANY GLASS, Company, France	<a href="#">4011_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4012 2022/04/28	Individual, France	<a href="#">4012_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4013 2022/04/28	Individual, France	<a href="#">4013_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4014 2022/04/28	Verre et Vitrail - Clotilde Gontel, Company, France	<a href="#">4014 lettre consultation plomb-aaf.pdf</a>	Please see response to comment # 3862
4015			

2022/04/28	Verre et vitrail - Aurélie Dupin, Company, France	<a href="#">4015_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4016 2022/04/28	Individual, France	<a href="#">4016_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4017 2022/04/28	Art'lekin, Company, France	<a href="#">4017_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4018 2022/04/28	Bistanclak, Company, France	<a href="#">4018_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4019 2022/04/28	Individual, France	<a href="#">4019_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4020 2022/04/28	German Association of the Automotive Industry (VDA) , Industry or trade association, Germany	<a href="#">4020_VDA_Blei Position für die Kommission recom com call for info questionnaire en final.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b>

			<p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>A.2.36 Attached COM questionnaire</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
4021 2022/04/28	La Maison du Vitrail, Company, France	<a href="#">4021_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4022 2022/04/28	La Maison du Vitrail, Company, France	<a href="#">4022_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4023 2022/04/28	BURG ARRAS, Regional or local authority, Germany	In unserer 1000jährigen BURG ARRAS (www.arras.de) befinden sich zahlreiche Fenster mit Bleiverglasungen. Asserdem verkaufen wir historische Bleifiguren in unserem Museums-Shop!	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> Thank you for the information provided
4024 2022/04/28	Individual, France	<a href="#">4024_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4026 2022/04/28	EAFC THUIN , Academic institution, Belgium	<a href="#">4026_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4027 2022/04/28	VITRAUX IMBERT , Company, France	<a href="#">4027_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4028 2022/04/28	Individual, France	<a href="#">4028_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4029 2022/04/28	Creative Retreats and Holidays, Company, United Kingdom	Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists such as myself and conservators/restorers in the field from practicing our profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].  Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered with lead solder at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals	Please see response to comment # 3585



		<p>of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>I strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	
4030 2022/04/28	SEVERINE GUESSANT, Company, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4031 2022/04/28	Individual, France	<a href="#">4031_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4032 2022/04/28	AUDREY PITOT VITRAIL, Company, France	<a href="#">4032_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4033 2022/04/28	Individual, France	<a href="#">4033_2022.04.25. - CSNV - Comment soumettre sa contribution.docx</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4034			

2022/04/28	De Verre et De Plomb Lelia Montanari, Company, France	<a href="#">4034_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4035 2022/04/28	atelier de vitrail, Company, France	<a href="#">4035_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4036 2022/04/28	Philidet Verre, Company, French Guiana	<a href="#">4036_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
4037 2022/04/28	Individual, France	<a href="#">4037_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4038 2022/04/28	Individual, France	<a href="#">4038_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4039 2022/04/28	Individual, France	<a href="#">4039_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4040 2022/04/28	MBOULAY Atelier Vitrail Le Cygne, Company, France	<a href="#">4040_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4041 2022/04/28	UP+L Consult SRL - Atelier Chant de Lumi�re , Company, Belgium	<a href="#">4041_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862

<p>4042 2022/04/28</p>	<p>Individual, France</p>	<p>CONTRIBUTION TO THE PROPOSAL MADE BY ECHA TO INCLUDE LEAD IN ANNEX XIV (AUTHORIZATION PROCESS) IN THE</p> <p>FRAMEWORK OF REACH ISSUED</p> <p>BY THE FRENCH NATIONAL TRADE UNION OF STAINED GLASS</p> <p>I- CONTEXT</p> <p>ECHA has proposed the inclusion of lead in Annex XIV of the REACH regulation via its draft 11th recommendation. A consultation is organized by ECHA in order to collect the position of stakeholders on this project. In this context, the National Trade Union Chamber of Stained Glass (CSNV) wishes to express its opposition to this project which, if implemented, would lead to the suppression of a thousand-year-old know-how and would condemn whole sections of European heritage.</p> <p>CHAMBRE SYNDICALE NATIONALE DU VITRAIL</p> <p>Chambre Syndicale Nationale du Vitrail</p> <p>114, rue la Boétie 75008 PARIS Tel : 01 42 65 60 02 Fax : 01 42 66 23 88</p> <p>www.vitrail-syndicat.fr - Courriel : <a href="mailto:president@vitrail-syndicat.fr">president@vitrail-syndicat.fr</a></p> <p>Created in 1894, the CSNV is the French professional organization bringing together 1,200 professionals who create and restore stained glass. These professionals form a sector whose influence is inversely proportional to its size; France has the largest area of stained glass in the world. A workshop has an average of 2 employees and an average turnover of around 100 k€/year. However, the know-how of master glassmakers is measured less in euros than in wealth induced in terms of tourism and local development, but also in intangible and historical terms. Lead in the form of metal has been used for more than a thousand years by stained glass artists to join and solder the pieces of glass forming a stained glass window.</p> <p>DESCRIPTION</p> <p>1. Stained glass is an assembly of glasses held together by H-shaped lead. Lead is the only</p>	<p>Please see response to comment # 3862</p>
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		<p>material allowing, due to its malleability, a precision crimping that no other material offers today.</p> <p>2. Heritage restoration is 70% part of the activity of our branch and if we can imagine using another glass assembly agent for creations, this is not the case for conservation and restoration which must, out of respect for the history of art and for the integrity of the works of art on which we work, use the original materials.</p> <p>3. In terms of creation, the surfaces treated between secular and religious are about 50/50.</p> <p>4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years).</p> <p>II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV</p> <p>a) There is no substitute for lead There are several ways to crimp glass:</p> <ul style="list-style-type: none"> <li>• Glass 2 to 5 mm thick tinted in the mass:</li> </ul> <p>1/ H-shaped lead crimp welded at each intersection with an alloy composed of 40% pure lead for 60% pure tin. This working method is the only one known to date to guarantee the integrity and durability of stained glass works of art, some of which were made in the Middle Ages and are still admired today.</p> <p>2/ Tiffany technique The lead rails are replaced by self-adhesive copper films placed around the entire periphery of the glasses. Solder (40% pure lead alloy for 60% pure tin) is used to join the glasses. This working method cannot be transposed to restoration work. The adhesive copper tape being distributed over the entire surface of the glass, the soldering operations over the entire surface of the tapes (and not at the point of intersection as for lead assembly) involve a very significant exposure of the glasses to heat and risks damaging old glasses by creating thermal shocks and causing multiple breaks on the glasses. The repair of stained glass windows assembled with copper is made extremely complex or even totally impossible on large surfaces because of the difficulty in extracting the pieces of glass from their welding sheaths. This process</p> <p>CHAMBRE SYNDICALE NATIONALE DU VITRAIL</p> <p>Chambre Syndicale</p>	
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		<p>Nationale du Vitrail</p> <p>114, rue la Boétie 75008 PARIS Tel : 01 42 65 60 02 Fax : 01 42 66 23 88</p> <p>www.vitrail-syndicat.fr - Courriel : president@vitrail-syndicat.fr</p> <p>consists of melting the tin around the entire contour of the piece of glass set with copper in order to extract it. On the other hand, the pieces of glass that make up a lead stained glass window have been calibrated in order to take into account the necessary reserve corresponding to the thickness of the heart of the lead in H. The work of cutting the glasses for the copper assembly does not take no reserve account, the pieces of glass are arranged edge to edge before being welded and not assembled as with lead. We cannot therefore transpose the Tiffany method on stained glass windows designed with lead.</p> <ul style="list-style-type: none"> <li>• Glasses from 1 cm to 2.5 cm thick</li> </ul> <p>For these glasses only, which are not stained glass but glass slabs, the use of a two-component epoxy resin loaded with a mineral mass is possible. This method cannot be transposed with thinner glasses of 2 to 5 mm as it is used in the stained glass method.</p> <p>b) Colored glass tinted in the mass, the only material allowing this work of light and color The particularity of stained glass is its assembly of colored glass tinted in the mass. These glasses allow the work of light and color like no other material. The assembly of small parts requires flexibility of the holding network, of which only lead can guarantee working flexibility and durability of at least 100 years.</p> <p>c) Une dangerosité liée à l'utilisation de plomb dans la fabrication des vitraux n'est pas avérée - Consumer health: there is no consumer exposure. The stained glass windows are supposed to adorn mostly religious monuments. These are ornamental pieces which, once installed, are not subject to manipulation and which we maintain by intervening every hundred years on average in order to replace the oxidized and weakened lead to guarantee the durability of the work. in time and the safety of their owners. - The volumes concerned underline the specific character of the works of the stained glass</p>	
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		<p>artists. Approximately 10,000 m2 of stained glass windows are refilled with lead each year, corresponding to 26 t of lead according to our estimates.</p> <p>- Worker health protection is framed at national level (in France, limit of 400 and 300 µg/L of blood). The French National Trade Union of Stained Glass has not identified any case of lead poisoning within the stained glass population. Thanks to the implementation of appropriate protocols within our companies and the generalization of the use of PPE, the lead levels in the blood of workers in the sector have dropped considerably and comply with standards.</p> <p>d) Economic and social, environmental, cultural and societal consequences:  Economic and Social :  Economically, this registration would harm a multitude of nearly 1200 VSEs-SMEs with an average of 2 employees, and the destruction of highly qualified jobs whose know-how recognized worldwide are essential for the maintenance of the greatest heritage. stained glass of the world. These companies are too small to bear the cost of producing an authorization application file – average turnover of around €100,000 – and the market is too small for suppliers to take an interest in them. In addition to the disappearance of nearly 1,200 VSEs and SMEs, and the destruction of jobs, there is a threat in terms of tourism: religious buildings and castles are jewels of European cultural heritage. Can we imagine the Cathedral of Notre-Dame-de-Paris (between 12 and 14 million visitors per year), that of Chartres (more than one million visitors per year) or the Saint-Chapelle (1.3 million visitors per year) without stained glass windows?</p> <p>CHAMBRE SYNDICALE NATIONALE DU VITRAIL</p> <p>Chambre  Syndicale  Nationale  du Vitrail</p> <p>114, rue la Boétie 75008 PARIS Tel : 01 42 65 60 02 Fax : 01 42 66 23 88</p> <p>www.vitrail-syndicat.fr - Courriel : president@vitrail-syndicat.fr</p>	
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		<p>Environmental:          Only our specialized craft companies are trained in the maintenance and restoration of stained glass heritage, one of the tasks of which is to disencase and separate the colored glass pieces from the oxidized and worn lead profiles in order to replace them with new lead. During these operations, used lead is systematically sorted and stored for recycling (we achieve a rate of almost 100% recycling of lead), our workshops thus avoid the dissemination of lead in household waste or nature. The know-how of our workshops is essential in the field of recycling lead from old stained glass windows.</p> <p>Cultural and societal:          These workshops, symbols of French know-how recognized by the State as "Living Heritage Companies", are part of French and European heritage, they contribute to the influence of our culture in the world. Our know-how has been passed down in our workshops since the Middle Ages, almost a seven thousand years.</p> <p>Stained glass windows used in places of worship, historical monuments and many private or public buildings:          The windows of the churches must be restored every 120 years. France, which has more than 60% of the world's heritage in terms of stained glass windows, must now restore those of the 19th century. The surface of 19th century stained glass windows itself corresponds to more than 60% of all old stained glass windows. They represent an artistic and historical richness. The area of stained glass in France is estimated at more than 90,000 square meters.</p> <p>If ECHA engages in a process of listing lead in Annex XIV of REACH without discernment and without consideration for the conservation-restoration of our heritage, it would seriously threaten European cultural heritage.</p> <p>It seems to us at least given the specificities of our sector that in the event of the inclusion of lead in Annex XIV, the use in the context of stained glass should be exempted. A partial exemption of the catering activity alone would significantly reduce the activity and would not make it possible to</p>	
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		retain the necessary know-how.	
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4043 2022/04/28	Individual, France	<a href="#">4043_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4044 2022/04/28	Olivier Delalande Architecte, Company, France	<a href="#">4044_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4045 2022/04/28	ASD-EUROSPACE, Industry or trade association, France	<p>REACH Art. 58(3)2 stresses that the prioritisation based on the three criteria (incl. wide dispersive use and volumes) shall (only) apply “normally”. In our view there are a number of reasons that warrant an exception from this rule with regard to lead metal:</p> <p>First of all, this ECHA initiative for such an important substance comes in the midst of the Commission’s activities and critical stakeholder consultation activities for an impact assessment to prepare a proposal for a revision of the REACH Regulation by the end of 2022, including a substantial Reform of the Authorisation and Restriction processes (one of the options even being the removal of the authorisation title from REACH!) and the development of an Essential Use Concept to better protect uses without alternatives that are necessary for health, safety or are critical for the functioning of society.</p> <p>Further to the REACH revision, a substantial review of the RoHS Directive 2011/65/EU is currently carried out by the Commission. A public consultation is on-going until 2 June 2022. RoHS includes lead as an important substance. The review also addresses the interface with REACH as one of its central elements.</p> <p>In such situation of pertinent legal revision (REACH, RoHS) we seriously question the timeliness of this Annex XIV (draft) recommendation for lead metal.</p> <p>As an EU agency ECHA should also take into account the Commission’s policy priorities for a substance. The Commission’s Action Plan under the Chemicals Strategy for Sustainability of 14 October 2020 (which is also the basis for the REACH revision) explicitly foresees the implementation of the Chemical Agents Directive by proposing lowering existing occupational limit values as the tool of choice to strengthen the protection of workers. By intending to recommend lead for authorisation in parallel / addition, ECHA does not take due account of the Commission’s strategy as reflected in the Action Plan.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.04 Questioning the scoring for article service life (+2 score)</b></p> <p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b></p> <p><b>A.2.09 Need for a consistent regulatory</b></p>



		<p>Furthermore, it appears more like a “box-ticking exercise” by ECHA, knowing that there are many substances which have already been recommended for Annex XIV but where the Commission has postponed the inclusion, often with regard to other regulatory management options (such as restrictions, OELs). This applies in particular to the four lead compounds previously recommended by ECHA (2016). In the latter case – as even stated by ECHA in its prioritisation assessment of 2 February 2022 – the European Commission in its previous amendment of Annex XIV (Commission Regulation (EU) 2020/1711) postponed the decision on the inclusion of four lead compounds. Reference was made to the Chemical Agents and Industrial Emissions Directives covering lead and its compounds and to the revision of the binding occupational and biological limit values. In our view ECHA should take into account such conclusion by the Commission when making its Annex XIV recommendation, but with a deprioritising effect. Therefore, the ECHA recommendation for lead appears premature.</p> <p>Also, in the latter regard it is not clear to us why substances with a higher priority score such as MCCP (score of 42 as compared to 28 for lead) and 1,4-dioxane (score of 32) have not been recommended by ECHA with regard to on-going work related to REACH restriction, but the same has not been considered for lead. This amounts to an unequal treatment of similar cases and an undesired interference between different regulatory actions, which according to ECHA's own general approach for prioritisation of SVHCs should be avoided.</p> <p>Additionally with regard to 1,4 dioxane, we do not understand the ECHA conclusion that “an OEL is not expected to have a major impact on the prioritisation”. According to the Commission this very fact justifies even a postponement of the Annex XIV inclusion (see above).</p> <p>In addition, lead is the first element (metal) ever intended to be proposed for REACH authorisation. Also, there is no precedent for an authorisation requirement to apply to alloys as “special mixtures” according to REACH and CLP Regulations. There is a need for ECHA to clarify first how alloys should be treated before taking any initiative to include the substance contained in Annex XIV.</p> <p>REACH Annex I “General provisions for assessing substances and preparing chemical safety reports” sets out in Section 0.11. “When assessing the risk of the use of one or more substances incorporated into a special mixture (for instance alloys), the way the constituent substances are bonded in the chemical matrix shall be taken into account.” Similarly, according to the Guidance on the Application of the CLP Criteria “metal alloys, or alloy manufacturing products, are not simple mixtures of metals or metal components, since the alloy clearly has distinctive properties compared to a classical mixture of its component metals” (IV.5.6.1 Classification of alloys and complex metal containing materials).</p> <p>Further to this, REACH Art. 58(3)3 sets out that “[t]he number of substances included in Annex</p>	<p><b>framework between REACH and RoHS</b></p> <p><b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b></p> <p><b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD</b></p> <p><b>A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete</b></p> <p><b>A.2.14 Postpone lead prioritisation and authorisation until definition and entry into force of the ‘essential use’ criteria</b></p> <p><b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.21 Borderline between mixtures and articles (Alloys)</b></p>
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		<p>XIV and the dates specified under paragraph 1 shall also take account of the Agency's capacity to handle applications in the time provided for." We refer to the contribution by ILA / PbRC and our estimate below, which indicates an excessive number of expected AfAs not only for the Space Sector, but also at the broader industrial scale. Clearly, this informed estimate should be taken into account already at the point of deciding on an ECHA Annex XIV recommendation. No recommendation for lead should be made in such case.</p> <p>As far as the background document (p3&amp;9/10) mentions the use of lead in articles above 10 t/y, we would like to note that uses of articles are not in scope of authorisation. Companies in the Space Sector have been working with lead and have managed related risks for decades. Risks are well known and considered as negligible. They are already reduced by the fact that operators use mainly finished or semi-finished products. Further information is included in our comments to the Commission on the same consultation (answers to question 6 and 7). Therefore, we question the related increase of the priority score with regard to article uses (presently +2).</p>	<p><b>A.2.25 Upfront clarification needed on authorisation requirement for alloys as special mixtures</b></p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b></p> <p><b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b></p> <p><b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p>Please see response to comment # 3856</p>
		<p><a href="#">4045_MPTB-ES-PO-0103_LTF response to ECHA_28APR2022.pdf</a></p>	

4046 2022/04/28	Individual, France	<a href="#">4046_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4047 2022/04/28	Atelier de Vitrail - C. BEAUBREUIL, Company, France	<a href="#">4047_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4048 2022/04/28	Margotak, Company, France	<a href="#">4048_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4049 2022/04/28	Historisches Museum Basel, Academic institution, Switzerland	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4050 2022/04/28	L'ENERGIE DES COULEURS, Company, France	<a href="#">4050_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4051 2022/04/29	Individual, Germany	<a href="#">4051_Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
4052 2022/04/29	Vitraux Ans, Company, France	<a href="#">4052_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4054 2022/04/29	Atelier de Vitrail, Company, France	<a href="#">4054_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862

4055 2022/04/29	Individual, France	<a href="#">4055_2022.04.25 - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4056 2022/04/29	Tiffans ry., Other contributor, Finland	<p>The request to derogate from the proposed EU regulation on the use of lead, which would prevent the glass industry in the sector and the profession of conservators / restorers and thus threaten the future of our stained glass heritage (REACH Annex XIV, EC number 231-100-4).</p> <p>Lead, cast, ground or extruded into lead profiles or strips; lead-based stained glass is an essential and inherent part of the manufacture and preservation of stained glass and stained glass. The lead profile is soldered at its intersections to form a strong and durable matrix that supports colored and painted glass. It is an art form with a millennial history located in world-famous heritage sites such as Chartres Cathedral, Notre Dame de Paris, Strasbourg (France), Cologne Cathedral, Naumburg (Germany), Brussels and Antwerp (Belgium).</p> <p>The workability, strength and durability of lead over the centuries make its unique properties invaluable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, preserved and preserved. Lead is essential for the survival and maintenance of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction, and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do it safely and with minimal and well-controlled risks.</p> <p>We urge the European Commission to exclude the use of lead in the manufacture and preservation of stained glass. Such a ban would not only destroy the livelihoods of glass artists, artisans and restorers involved in the care of Europe's heritage, but would also affect the rest of the world and would ultimately be a death sentence for one of humanity's best-known art forms.</p>	Please see response to comment # 3585
4057 2022/04/29	SARL STEF ATELIER, Company, France	<a href="#">4057_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4058 2022/04/29	Individual, Germany	<a href="#">4058_Bleiverglasung EU.pdf</a>	Please see response to comment #

			3585
4059 2022/04/29	chambre syndicale national du vitrail, Academic institution, France	<a href="#">4059_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Fran�ais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4060 2022/04/29	Individual, France	<a href="#">4060_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4061 2022/04/29	Istainedglass, Company, Netherlands	<a href="#">4061_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4062 2022/04/29	Individual, France	<a href="#">4062_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4063 2022/04/29	ATELIER LA BOHEME, Company, France	<a href="#">4063_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4064 2022/04/29	pascaline bonnet, Company, France	<a href="#">4064_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4065 2022/04/29	Individual, France	<a href="#">4065_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4066 2022/04/29	SEBISOLE, Company, France	<a href="#">4066_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4067 2022/04/29	Individual, France	<a href="#">4067_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4069 2022/04/29	Académie royale des Sciences, des Lettres et des Beaux-Arts de Belgique, Academic institution, Belgium	<a href="#">4069_20220428161808076.pdf</a>	Please see response to comment # 3585
4070 2022/04/29	Stichting Oude Groninger Kerken, National NGO, Netherlands	<a href="#">4070_ECHA's plan to include lead in the list of substances subject to authorisation - Letter.pdf</a>	Please see response to comment # 3585
4071 2022/04/29	école suisse de vitrail et création - monthey, Company, Switzerland	<a href="#">4071_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4072 2022/04/29	Atelier de Vitrail, Company, France	<a href="#">4072_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4073 2022/04/29	Individual, France	<a href="#">4073_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4074 2022/04/29	Kongsberg Defence & Aerospace AS, Company, Norway	KDA have no comments on ECHAs prioritisation or general recommendation for inclusion on Annex XIV.	-
4075 2022/04/29	Renotec nv, Company, Belgium	<i>Confidential attachment removed</i>	Please see response to comment # 3585

4076 2022/04/29	Individual, Switzerland	Lead as an important material for historical and contemporary windows, especially in the field of monument preservation of historic buildings such as churches and private houses, should certainly not have a permit requirement, as this puts a big stone in the way of the preservation of cultural heritage. A special solution should be sought here!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4077 2022/04/29	sinclair martin architecte, Company, France	<a href="#">4077_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4078 2022/04/29	Individual, Austria	<p>Mag. art. Nina Zangerl Textilrestaurierung 1050 Wien Österreich</p> <p>European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finnland</p> <p>Bitte um Ausnahmeregelung für die Verwendung von Blei an Kunst- und Kulturgut, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4]</p> <p>Sehr geehrte Damen und Herren, das Material Blei ist Bestandteil von Kunst- und Kulturgut fast aller Epochen und Gattungen, insbesondere des Industriellen Kulturguts, kunsthandwerklicher Objekte, Metallskulpturen, Musikinstrumenten, historischen Gebäuden, archäologischen Objekten oder Glasmalerei. In künstlerischer oder funktionaler Verwendung begegnen wir Blei beispielsweise als gegossene Bleifiguren oder –skulpturen, Wuchtgewichte im technischen Kulturgut oder bei Tasteninstrumenten, Orgelpfeifen, historischer Munition und Waffen, Numismatik (Münzen, Medaillen, Plomben), Phaleristik (Orden, Ehrenzeichen und Abzeichen), Knöpfe (lose oder an Uniformen angenäht), Zierelemente an Uniformteilen, Insignien und anderen Gegenständen (Kopfbedeckungen, Uniformen, Fahnen, Kisten, Bilderrahmen, etc.), als Bleiverglasungen von</p>	Please see response to comment # 3740

		<p>Glasfenstern, in der Architektur als Walzblei im Dach- und Fassadenbereich, als Rohre und Leitungen oder Bleiverstimmungen im Stein. Bleiverbindungen sind auch als Pigmente in historischen Korrosionsschutzanstrichen, Farbfassungen von Gemälden, Skulpturen und Möbeln enthalten, ebenso in bleihaltigen Keramikglasuren, Emails oder Bleikristallglas.</p> <p>Restaurator: innen schützen und erhalten diese Objekte und Werke des kulturellen Erbes für die langfristige Nutzung, Forschung und Wissensvermittlung. Ihre Tätigkeiten bestehen in der wissenschaftlichen und praxisorientierten Erforschung und Bewahrung von Material, und Herstellungstechniken im kulturellen Kontext sowie in der Entwicklung, Planung und Durchführung von Maßnahmen für deren Erhalt.</p> <p>Ohne Blei können wichtige Bereiche der Konservierung-Restaurierung in unseren Museen und der Denkmalpflege nicht mehr ausgeführt werden. Darüber hinaus ist dieses Material für den Fortbestand des Wissens um historische Techniken und für deren Rekonstruktionen unverzichtbar.</p> <p>Die Toxizität von Blei und seinen Korrosionsprodukten ist sehr gut bekannt und seine Gesundheitsrisiken werden in der Branche professionell gehandhabt. Die Verwendung von Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests im Rahmen ausformulierter Betriebsanweisungen sorgen für einen kontrollierten Umgang mit dem Gefahrstoff und minimieren das gesundheitliche Risiko.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung, Transport und Präsentation von Kunst- und Kulturgut von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Erhalt und die Präsentation dieser Werke in Museen, Archiven, Sammlungen, Kirchen und öffentlichen Gebäuden erschweren, sondern auch den Lebensunterhalt von Restaurator:innen, die für den Erhalt unseres bedeutenden Kulturerbes in Europa arbeiten.</p> <p>Mit freundlichen Grüßen</p> <p>Nina Zangerl</p>	
4079 2022/04/29	RUAG Ammotec GmbH, Company, Germany	<p>Lead should not be included in Annex XIV.</p> <p><a href="#">4079 Consultation Input RUAG Ammotec.zip</a></p> <p><i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p>



			<p><b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b> <b>A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation</b> <b>A.2.15 Excessive number of expected AfA to be considered as</b></p>
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			<p>reason not to recommend lead</p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
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			<b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b>
4080 2022/04/29	Atelier Christalyde, Company, France	<a href="#">4080_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4081 2022/04/29	Individual, Germany	<a href="#">4081_Lead EC Number 231-100-4.pdf</a>	Please see response to comment # 3585
4082 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short  <a href="#">4082_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4083 2022/04/29	Individual, France	<a href="#">4083_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4085 2022/04/29	Atelier Bassinot, Company, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4086 2022/04/29	Individual, Germany	The EU wide ban of lead as bullet material, for target shooting is not acceptable for Germany, hence the shooting ranges in Germany are equipped with bullet traps, that avert lead contamination of the natural environment. This is valid for outdoor and indoor shooting ranges. In addition, the lead contamination of participants using indoor ranges is prevented by corresponding air extraction systems.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>
4087 2022/04/29	Individual, France	<a href="#">4087_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4088 2022/04/29	University Bordeaux Montaigne, Academic institution, France	The letter of Aude Tahon, Présidente d'Ateliers d'Art de France, is essential and needs to be taken completely into consideration concerning in particular the inclusion of lead in Annex XIV of the REACH Regulation.	Please see response to comment # 3805
4089 2022/04/29	Glasmalerei Otto Peters GmbH, Company, Germany	<p>Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalereirestauratoren</p> <p>Sehr geehrte Damen und Herren, sehr geehrte Frau Mariya Gabriel, das Material Blei, gegossen, gezogen, kalt verformt in Form von Bleiruten oder Walzblei, oder als Bestandteil unserer verwendeten Farben, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern.</p> <p>Bei klassischen Bleiverglasungen bildet die Bleirute, an seinen Kreuzungspunkten mit Lot fixiert, eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.</p> <p>Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken, insbesondere in europäischen, aber auch weltweiten, Sakralbauten zu finden ist. Wir führen jedes Jahr weit über 100 Restaurierungsprojekte aus, unter anderem Restaurierungen in den Kathedralen von Sevilla, Chartres oder Nürnberg. Jeder einzelne dieser Sakralbauten ist ohne die Bleiverglasten Fenster unvorstellbar.</p> <p>Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.</p> <p>Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz und Gerhard Richter begeistert.</p> <p>Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.</p> <p>Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend</p>	Please see response to comment # 3585

		<p>Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Des Weiteren verwenden wir Bleihaltige Farben, selbstverständlich ebenfalls mit allen Schutzmaßnahmen. Leider gibt es auch hier bisher keine Alternative zu Bleihaltigen Farben im Bereich der Glasmalerei. Gemeinsam mit der Bundesanstalt für Materialforschung haben wir in der Vergangenheit hierzu ein Forschungsprojekt durchgeführt, welches dies bestätigt.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Für uns konkret würde ein solches Verbot die Existenz unserer Firma bedrohen und damit das Ende eines Familienunternehmens mit einer 111-jährigen Tradition. In der Konsequenz würde dies eine Gefährdung der Arbeitsplätze unserer Mitarbeiter (ca. 50 FTE verteilt auf ca. 70 Personen) bedeuten. Unsere Mitarbeiter sind überwiegend gelernte Glasveredler, die mit einem solchen Verbot akut von Arbeitslosigkeit bedroht wären.</p> <p>Mit freundlichen Grüßen</p> <p>Christine Müller</p>	
4090 2022/04/29	Atelier les ailes de verre, Company, France	<a href="#">4090_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4091 2022/04/29	Hessisches Landesmuseum Darmstadt, Other contributor, Germany	<a href="#">4091_ECHA.pdf</a>	Please see response to comment # 3585
4092 2022/04/29	ICOM Austria - Austrian National Committee of the International Council of Museums, National NGO, Austria	Exclude: Artists, Conservators, Museums, Crafts - please see attached letter. <a href="#">4092_Brief_Blei_EK_29042022.pdf</a>	Please see response to comment # 3585

4093 2022/04/29	ARCHITECTES DU PATRIMOINE, Trade union, France	<a href="#">4093_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4094 2022/04/29	ICOM Germany, National NGO, Germany	<p>Sehr geehrte Damen und Herren,</p> <p>das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.</p> <p>Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.</p> <p>Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnütgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.</p> <p>Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreier, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz und Gerhard Richter begeistert.</p> <p>Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.</p> <p>Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem</p>	Please see response to comment # 3585

		<p>vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen,</p> <p>Prof. Dr. Beate Reifenscheid Präsidentin, ICOM Deutschland</p>	
		<i>Confidential attachment removed</i>	
4095 2022/04/29	University of Amsterdam, conservation and restoration of cultural heritage, Academic institution, Netherlands	<p>On behalf of Conservation and Restoration of Cultural Heritage, University of Amsterdam, I wish to raise our severe concerns about the European Chemicals Agency's (ECHA) plan to include the material lead in Appendix XIV (Authorisation List) of the REACH Regulation. This would not only pose a major threat to the conservation, maintenance, presentation and even the creation of a large number of art and cultural objects, but would also destroy the livelihoods of countless conservator-restorers, craftsmen and artists, an economic, cultural and social impoverishment on a massive scale.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4096 2022/04/29	FV Metalltechnische Industrie, Industry or trade association, Austria	<p>As we know the prioritisation is based on the automaticscoring system. Lead is a high volume substances but on the other hand very well regulated in Europe. At the moment we want to achieve a green transformation in europe. Therefore, a regulation in REACH of a key substance for batteries and many other green technologies is not a very good option. We please not include lead in REACH XIV. Please regulate lead in REACH XVII, RoHS, EU OEL, ELV and the Batteries Regulation. This would help directly the environment, the workers who are in contact with lead and the people in Europe.</p>	<p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>

			<b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b>
4097 2022/04/29	Atelier ArP' SARL d'architecture, Company, France	<a href="#">4097_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4099 2022/04/29	Germany, Member State	<a href="#">4099_20220429093645192.pdf</a>	Please see response to comment # 3585
4100 2022/04/29	Kludi GmbH & Co. KG, Company, Germany	<p>Lead in mixtures is classified as toxic for reproduction category 1A according to the CLP regulation (bulk form) with a concentration limit of <math>\geq 0.3\%</math>. The Kludi company manufactures sanitary fittings and processes brass-based alloys with a lead content of xxxx tons/year exclusively on an industrial level (SU 15). In comparison with data from registrations, this corresponds to a share of xxxxxx%. Processing takes place at three locations: in Germany (Menden), Austria (Hornstein) and Hungary (Diosd). A release of lead from end products is not to be expected, neither for the consumer nor for the environment. Since the brass-based alloys are more than <math>\geq 80\%</math> recycled in a recycling process, there is no waste and no burden on the environment. The exposure of workers is xxx times lower than the legal limit values for occupational safety.</p> <p><a href="#">4100_Kommentierung_Blei_Public_EN.pdf</a> <i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b>  <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation /</b></p>



			<p><b>drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.25 Upfront clarification needed on authorisation requirement for alloys as special mixtures</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
4101 2022/04/29	Inès Sahli - Vitrail, Company, France	<a href="#">4101_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4102 2022/04/29	Individual, France	<a href="#">4102_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4103 2022/04/29	Individual, France	<a href="#">4103_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862

4104 2022/04/29	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short	Please see response to comment # 3862
		<a href="#">4104_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	
4105 2022/04/29	Ateliers d'Art de France, Trade union, France		Please see response to comment # 3805
		<a href="#">4105_Contribution d'Ateliers d'Art de France.pdf</a>	
4106 2022/04/29	Individual, France	<a href="#">4106_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4107 2022/04/29	Danielle Burguion Design, Company, France	<a href="#">4107_CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4108 2022/04/29	Röhr + Stolberg GmbH (a subsidiary of Calder Group Ltd. and this response is submitted on their behalf), Company, Germany	Calder Group support the comments submitted by the International Lead Association (ILA). <a href="#">4108_Calder Group comments to ECHA public consultation 28042022.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b>

			<p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b>  <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b>  <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b>  <b>B.2.01. Request extra long LAD</b>  <b>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</b>  <b>C.1.1. General principles for exemptions under Art. 58(2)</b>  <b>C.1.2. Generic exemptions</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
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			<p><b>C.2.06 Exemption request for uses in medical devices</b>  <b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b></p> <p>Please see response to comment # 3856</p>
4109 2022/04/29	Individual, Germany	The EU wide ban of lead as bullet material, for target shooting is not acceptable for Germany, hence the shooting ranges in Germany are equipped with bullet traps, that avert lead contamination of the natural environment. This is valid for outdoor and indoor shooting ranges. In addition, the lead contamination of participants using indoor ranges is prevented by corresponding air extraction systems.	Please see response to comment # 4086
4110 2022/04/29	Olivier SALMON Architecte SASU - ACMH, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4110_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4111 2022/04/29	Atelier Le Metayer Bessac, Company, France	<a href="#">4111_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> Confidential attachment removed	Please see response to comment # 3862
4112 2022/04/29	Individual, France	No.	Thank you for your opinion.
4113 2022/04/29	Arbeitsgemeinschaft Oberflächentechnik, Industry or trade association, Austria	Due to the automatic scoring system, we understand that lead is evaluated by ECHA. On the other hand, lead is already very well regulated in Europe i.e. REACH XVII, RoHS, EU OEL, ELV and Batteries Regulations. Therefore, an inclusion in Annex XIV Reach is for us as an surfacetreatment industry not an appropriated measure.	<p><b>A.1.5.1. Potential other regulatory actions</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p>
4114	Europacable AISBL,		

2022/04/29	Industry or trade association, Belgium	<a href="#">4114 Europacable - comments to ECHA public consultation - 29 April 2022 .pdf</a>	<p><b>A.1.1. General, recommendation process</b></p> <p><b>A.1.1.2. Legal basis for prioritisation</b></p> <p><b>A.1.1.3. Prioritisation approach applied</b></p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.02 Questioning the volume score</b></p> <p><b>A.2.03 Suggest lower (WDU) score considering existing EU legislation contributing to improved risk control</b></p> <p><b>A.2.04 Questioning the scoring for article service life (+2 score)</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the</b></p>
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			<p>risk of double regulation and ask for regulatory coherence A.2.08 BOEL more effective to address occupational exposure than Authorisation A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete A.2.14 Postpone lead prioritisation and authorisation until definition and entry into force of the 'essential use' criteria A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades A.2.18 Essential role of lead metal for Green Deal and circular economy A.2.29 Questioning the priority of lead, as it</p>
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			<p>has the lowest intrinsic property score</p> <p>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</p> <p>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</p> <p>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</p> <p>B.1.2.2. Lack of alternatives, socio-economic aspects</p> <p>B.2.01. Request extra long LAD</p> <p>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</p> <p>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</p> <p>C.1.1. General principles for exemptions under Art. 58(2)</p>
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			<b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4115 2022/04/29	Mairie de Meudon, Regional or local authority, France	<a href="#">4115_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4116 2022/04/29	Individual, Poland	<a href="#">4116_recom_com_call_for_info_questionnaire_2022-04-27_PPUH_Autopart_Jacek_Bak_Sp._z_o.o._en.docx.pdf</a>	<b>A.2.36 Attached COM questionnaire</b>  Please see response to comment # 4117
4117 2022/04/29	Individual, Poland	<a href="#">4117_recom_com_call_for_info_questionnaire_2022-04-27_Autopart_SA_GB.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b> <b>A.2.36 Attached COM questionnaire</b>
4118 2022/04/29	Individual, France	<a href="#">4118_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #



			3862
4119 2022/04/29	Iumivitra, Company, France	<a href="#">4119_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4120 2022/04/29	Individual, France	<a href="#">4120_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4121 2022/04/29	Individual, France	<p>CONTRIBUTION TO THE PROPOSAL MADE BY ECHA TO INCLUDE LEAD IN ANNEX XIV (AUTHORIZATION PROCESS) IN THE FRAMEWORK OF REACH ISSUED BY THE FRENCH NATIONAL TRADE UNION OF STAINED GLASS</p> <p>I- CONTEXT</p> <p>ECHA has proposed the inclusion of lead in Annex XIV of the REACH regulation via its draft 11th recommendation. A consultation is organized by ECHA in order to collect the position of stakeholders on this project. In this context, the National Trade Union Chamber of Stained Glass (CSNV) wishes to express its opposition to this project which, if implemented, would lead to the suppression of a thousand-year-old know-how and would condemn whole sections of European heritage.</p> <p>Created in 1894, the CSNV is the French professional organization bringing together 1,200 professionals who create and restore stained glass. These professionals form a sector whose influence is inversely proportional to its size; France has the largest area of stained glass in the world.</p> <p>A workshop has an average of 2 employees and an average turnover of around 100 k€/year.</p> <p>However, the know-how of master glassmakers is measured less in euros than in wealth induced in terms of tourism and local development, but also in intangible and historical terms.</p> <p>Lead in the form of metal has been used for more than a thousand years by stained glass artists to join and solder the pieces of glass forming a stained glass window.</p> <p>DESCRIPTION</p>	Please see response to comment # 3862

		<p>1. Stained glass is an assembly of glasses held together by H-shaped lead. Lead is the only material allowing, due to its malleability, a precision crimping that no other material offers today.</p> <p>2. Heritage restoration is 70% part of the activity of our branch and if we can imagine using another glass assembly agent for creations, this is not the case for conservation and restoration which must, out of respect for the history of art and for the integrity of the works of art on which we work, use the original materials.</p> <p>3. In terms of creation, the surfaces treated between secular and religious are about 50/50.</p> <p>4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years).</p> <p>II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV</p> <p>a) There is no substitute for lead</p> <p>There are several ways to crimp glass:</p> <ul style="list-style-type: none"> <li>• Glass 2 to 5 mm thick tinted in the mass:</li> </ul> <p>1/ H-shaped lead crimp welded at each intersection with an alloy composed of 40% pure lead for 60% pure tin. This working method is the only one known to date to guarantee the integrity and durability of stained glass works of art, some of which were made in the Middle Ages and are still admired today.</p> <p>2/ Tiffany technique          The lead rails are replaced by self-adhesive copper films placed around the entire periphery of the glasses. Solder (40% pure lead alloy for 60% pure tin) is used to join the glasses. This working method cannot be transposed to restoration work.          The adhesive copper tape being distributed over the entire surface of the glass, the soldering operations over the entire surface of the tapes (and not at the point of intersection as for lead assembly) involve a very significant exposure of the glasses to heat and risks damaging old glasses by creating thermal shocks and causing multiple breaks on the glasses. The repair of stained glass windows assembled with copper is made extremely complex or even totally impossible on large surfaces because of the difficulty in extracting the pieces of glass from their</p>	
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		<p>welding sheaths. This process consists of melting the tin around the entire contour of the piece of glass set with copper in order to extract it. On the other hand, the pieces of glass that make up a lead stained glass window have been calibrated in order to take into account the necessary reserve corresponding to the thickness of the heart of the lead in H. The work of cutting the glasses for the copper assembly does not take no reserve account, the pieces of glass are arranged edge to edge before being welded and not assembled as with lead. We cannot therefore transpose the Tiffany method on stained glass windows designed with lead.</p> <ul style="list-style-type: none"> <li>• Glasses from 1 cm to 2.5 cm thick</li> </ul> <p>For these glasses only, which are not stained glass but glass slabs, the use of a two-component epoxy resin loaded with a mineral mass is possible. This method cannot be transposed with thinner glasses of 2 to 5 mm as it is used in the stained glass method.</p> <p>b) Colored glass tinted in the mass, the only material allowing this work of light and color The particularity of stained glass is its assembly of colored glass tinted in the mass. These glasses allow the work of light and color like no other material. The assembly of small parts requires flexibility of the holding network, of which only lead can guarantee working flexibility and durability of at least 100 years.</p> <p>c) Une dangerosité liée à l'utilisation de plomb dans la fabrication des vitraux n'est pas avérée</p> <ul style="list-style-type: none"> <li>- Consumer health: there is no consumer exposure. The stained glass windows are supposed to adorn mostly religious monuments. These are ornamental pieces which, once installed, are not subject to manipulation and which we maintain by intervening every hundred years on average in order to replace the oxidized and weakened lead to guarantee the durability of the work. in time and the safety of their owners.</li> <li>- The volumes concerned underline the specific character of the works of the stained glass artists. Approximately 10,000 m<sup>2</sup> of stained glass windows are refilled with lead each year, corresponding to 26 t of lead according to our estimates.</li> <li>- Worker health protection is framed at national level (in France, limit of 400 and 300 µg/L of blood). The French National Trade Union of Stained Glass has not identified any case of lead poisoning within the stained glass population. Thanks to the implementation of appropriate protocols within our companies and the generalization of the use of PPE, the lead levels in the blood of workers in the sector have dropped considerably and comply with standards.</li> </ul> <p>d) Economic and social, environmental, cultural and societal consequences:</p>	
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		<p>Economic and Social :</p> <p>Economically, this registration would harm a multitude of nearly 1200 VSEs-SMEs with an average of 2 employees, and the destruction of highly qualified jobs whose know-how recognized worldwide are essential for the maintenance of the greatest heritage. stained glass of the world. These companies are too small to bear the cost of producing an authorization application file – average turnover of around €100,000 – and the market is too small for suppliers to take an interest in them.</p> <p>In addition to the disappearance of nearly 1,200 VSEs and SMEs, and the destruction of jobs, there is a threat in terms of tourism: religious buildings and castles are jewels of European cultural heritage. Can we imagine the Cathedral of Notre-Dame-de-Paris (between 12 and 14 million visitors per year), that of Chartres (more than one million visitors per year) or the Saint-Chapelle (1.3 million visitors per year) without stained glass windows?</p> <p>Environmental:</p> <p>Only our specialized craft companies are trained in the maintenance and restoration of stained glass heritage, one of the tasks of which is to disencase and separate the colored glass pieces from the oxidized and worn lead profiles in order to replace them with new lead. During these operations, used lead is systematically sorted and stored for recycling (we achieve a rate of almost 100% recycling of lead), our workshops thus avoid the dissemination of lead in household waste or nature. The know-how of our workshops is essential in the field of recycling lead from old stained glass windows.</p> <p>Cultural and societal:</p> <p>These workshops, symbols of French know-how recognized by the State as "Living Heritage Companies", are part of French and European heritage, they contribute to the influence of our culture in the world. Our know-how has been passed down in our workshops since the Middle Ages, almost a seven thousand years.</p> <p>Stained glass windows used in places of worship, historical monuments and many private or public buildings:</p> <p>The windows of the churches must be restored every 120 years. France, which has more than 60% of the world's heritage in terms of stained glass windows, must now restore those of the 19th century. The surface of 19th century stained glass windows itself corresponds to more than 60% of all old stained glass windows. They represent an artistic and historical richness. The area of stained glass in France is estimated at more than 90,000 square meters.</p> <p>If ECHA engages in a process of listing lead in Annex XIV of REACH without discernment and without consideration for the conservation-restoration of our heritage, it would seriously threaten European cultural heritage.</p>	
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		It seems to us at least given the specificities of our sector that in the event of the inclusion of lead in Annex XIV, the use in the context of stained glass should be exempted. A partial exemption of the catering activity alone would significantly reduce the activity and would not make it possible to retain the necessary know-how.	
		<a href="#">4121_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	
4122 2022/04/29	EGMF - European Garden Machinery industry Federation, Industry or trade association, Belgium	<a href="#">4122_EGMF comments on inclusion of lead metal in REACH Annex XIV- 29.04.2022.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.1.5.8. Uncertainty as to whether authorisation will be granted</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b> <b>C.1.3. Aspects not justifying an</b>

			<b>exemption from authorisation C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4124 2022/04/29	ID VITRIL, Company, France	<a href="#">4124_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4125 2022/04/29	Individual, France	<a href="#">4125_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4126 2022/04/29	IBP Conex Bänninger, Company, Germany	<p>o Pb is technically essential and is needed for the control of many properties in Cu alloys</p> <p>o Pb is already regulated in all product markets known to us (e.g. drinking water, ELV, RoHS...) via corresponding restrictions (Annex XVII REACH and others). No further restriction is needed</p> <p>o The authorization for the production of Pb-containing alloys applies ONLY to European manufacturers.</p> <p>This would lead to DIRECT distortions of competition on the semi-finished product market as well as INDI-REACT distortions of competition for the end products.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>C.1.3. Aspects not justifying an</b></p>

			<b>exemption from authorisation C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4127 2022/04/29	Rheinisches Landesmuseum Trier, Other contributor, Germany	<a href="#">4127_ECHA.pdf</a>	Please see response to comment # 3585
4128 2022/04/29	Individual, Germany	The EU wide ban of lead as bullet material, for target shooting is not acceptable for Germany, hence the shooting ranges in Germany are equipped with bullet traps, that avert lead contamination of the natural environment. This is valid for outdoor and indoor shooting ranges. In addition, the lead contamination of participants using indoor ranges is prevented by corresponding air extraction systems.	Please see response to comment # 4086
4129 2022/04/29	Birmingham Museums Trust, Other contributor, United Kingdom	Whilst there is no doubt that lead is a harmful material, there seems to be a lack of understanding in the proposal regarding the use of lead in heritage and culture. The need for authorisation would result in the death of stained glass and have devastating impacts on heritage collections. <a href="#">4129_Lead letter ECHA.doc</a>	Please see response to comment # 3585
4130 2022/04/29	Individual, France	<a href="#">4130_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4131 2022/04/29	Worshipful Company of Glaziers & Painters of Glass, Industry or trade association, United Kingdom	<a href="#">4131_Lead Derogation.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>

			<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4132 2022/04/29	Audrey fauvey atelier de vitraux, Company, France	<a href="#">4132_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4133 2022/04/29	CMA France, Industry or trade association, France	<a href="#">4133_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4134 2022/04/29	IBP ATCOSA, S. L., Company, Spain	<p>Pb is technically essential and is needed for the control of many properties in Cu alloys.</p> <p>Pb is already regulated in all product markets known to us (e.g. drinking water, ELV, RoHS...) via corresponding restrictions (Annex XVII REACH and others). No further restriction is needed.</p> <p>The authorization for the production of Pb-containing alloys applies ONLY to European manufacturers. This would lead to DIRECT distortions of competition on the semi-finished product market as well as INDI-REACT distortions of competition for the end products.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>



			<b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4135 2022/04/29	Bundesverband der deutschen Musikinstrumenten-Hersteller e. V., Industry or trade association, Germany	<p>We see no need to restrict lead as well as lead-containing materials in musical instrument making by including them in Annex XIV of the REACH Regulation.</p> <p>There is no health hazard for employees in the manufacture of musical instruments.</p> <p>Occupational safety as well as health monitoring measures for the manufacture of musical instruments are already regulated by existing legal regulations that have been recognized by the European Commission. In the blood tests that have been ordered many decades ago, e.g. by the German Employer's Liability Insurance Association, there have been no indications of any health hazards to employees. This is also the case because the melting temperatures of 300 to 350 degrees Celsius are still far below the critical threshold (approx. 480 ) for the release of lead vapours.</p> <p>There is no danger to the consumer from the lead components, since there is no direct contact. In pianos and grand pianos, all lead components are installed inside the action and are not accessible to the musician. Wind instruments are usually cleaned from protruding solder residues before the final coating, is completely enclosing and covering the solder joints. In addition, the complete instrument is also coated and lacquered, silver-plated or gold-plated. Thus, the consumer does not come into contact with brass parts alloyed with lead (smaller than 3%). Tests on mouthpieces of brass instruments by TÜV-Rheinland showed that the lead content in all tests was far below the limit values of 0.05µg/cm<sup>2</sup>/h and so there is no danger for the musician.</p> <p>There are no negative effects on the environment due to the extremely long service life of musical instruments of 50 to well over 100 years as well as the closed recycling cycles.</p> <p>The volume of lead-containing materials in musical instrument manufacturing breaks down as follows:</p> <p>Woodwind, brass and other instruments use less than 10 tonnes of lead-containing substances per year this corresponds to 0.001% of the total amount of all lead used in the EU. In piano making this is about 36 tonnes per year (0.002%) and in organ building about 50 tonnes per year (0.003%). In terms of the volume score, musical instrument manufacturing in general is in the very low category and piano and organ manufacturing is in the low category. From our point of view, the annual volumes of the entire musical instrument manufacturing industry are extremely low compared to all other industrial sectors and can therefore be classified as irrelevant.</p> <p>The production of musical instruments takes place in the manufacturers' workshops and thus falls into the industrial use (IND). Only in individual cases, such as the repair of pianos or the on-site installation of organ pipes, does work have to be carried out at the customer's premises.</p> <p><a href="#">4135_BDMH.zip</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art.</b></p>

			<p>58(2) based on existing legislation</p> <p>C.2.03 Exempt uses that have been derogated in existing restrictions addressing other substances than lead</p> <p>C.2.08 Exempt use in art and building sector</p>
4136 2022/04/29	Dornbracht AG Co. KG, Company, Germany	<p>Lead in mixtures is classified as toxic for reproduction category 1A according to the CLP regulation (bulk form) with a concentration limit of greater or equal 0.3%. The Kludi company manufactures sanitary fittings and processes brass-based alloys with a lead content of XX tons/year exclusively on an industrial level (SU 15). In comparison with data from registrations, this corresponds to a share of XXXX%. Processing takes place at three locations: in Germany (Iserlohn) and suppliers in the North Rhine-Westphalia region. A release of lead from end products is not to be expected, neither for the consumer nor for the environment. Since the brass-based alloys are more than greater 80% recycled in a recycling process, there is no waste and no burden on the environment. The exposure of the employees is XXX times below the legal limit values of occupational safety.</p> <p><a href="#">4136_220428_nc_Kommentierung_Blei_final.pdf</a> <i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for</b></p>

			<p>recycling or recovered materials</p> <p><b>A.2.25 Upfront clarification needed on authorisation requirement for alloys as special mixtures</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
4138 2022/04/29	suzie molina , Company, France	<a href="#">4138_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4139 2022/04/29	1, 2, 3...Silice!, Company, France	<a href="#">4139_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais[1].pdf</a>	Please see response to comment # 3862
4140 2022/04/29	Individual, France	<p>I am a stained glass artist in Chartres, and I create and restore windows as well as decorative objects since 10 years. I use lead using the traditional technique, with care.</p> <p>I check my blood for lead every year and I am below the unhealthy level.</p> <p>I know that there is no good alternative option to make traditional stained glass, and if it's use is banished, I may have to stop my business and passion.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4141 2022/04/29	Alexandra Giès, Company,	<a href="#">4141_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

	France		Please see response to comment # 3862
4142 2022/04/29	chambre syndicale du vitrail, Trade union, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4142_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4143 2022/04/29	Individual, Germany	<a href="#">4143_Stephan Wolf Einspruch ECHA_SW_20220427.pdf</a>	Please see response to comment # 3585
4144 2022/04/29	SAG vitrail, Company, France	<a href="#">4144_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
4145 2022/04/29	Individual, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4146 2022/04/29	Individual, Germany	<a href="#">4146_Jonas Jückstock Exemption request for lead ECHA.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished</b>

			<b>articles or historic artefacts</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4147 2022/04/29	Individual, France	<a href="#">4147_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4148 2022/04/29	Staatliche Verwaltung der bayerischen Schlösser, Gärten und Seen, Regional or local authority, Germany	<a href="#">4148_Kathrin Janis Exemption request for lead ECHA.pdf</a>	Please see response to comment # 4146
4149 2022/04/29	La Maison du Vitrail, Company, France	<a href="#">4149_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4150 2022/04/29	Parliamentary Group "automobile cultural property" of the national Parliament of the Federal Republic of Germany, Deutscher Bundestag, National Authority, Germany	<p>Dear Ladies and Gentlemen,</p> <p>Mobility has always been a fundamental driving force of human societies and, during the 19th and 20th century, has decisively shaped them worldwide. As a parliamentary group for automotive cultural asset and in particular for historic vehicles of all kinds, I see the ECHA's planned authorization requirement for the production, use, storage and exhibition of lead in all its manifestations as a fundamental threat to associated artifacts. These include, for example, historic rail material, land and water vehicles, and even aircraft. In the vast majority of cases, substances and components containing lead were used in their manufacture and are integral to their originality and historic fabric.</p> <p>These are, for example:</p> <p>- Historic batteries</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.8. Uncertainty as to whether</b>

		<ul style="list-style-type: none"> <li>- Other historic electrical components such as circuit boards and control units</li> <li>- Lead-plated sheet metal (e.g. used for corrosion-resistant lining of historic fuel tanks)</li> <li>- Soldered joints in radiator elements</li> <li>- so called „lead-work“, e. g. the flat application of solder used for finishing sheet metal in traditional coachbuilding</li> <li>- Historic plain bearings (e.g. on rolling stock)</li> <li>- Historic lead tools for fabrication and machining of historic vehicles</li> <li>- Lead sheet metal used for housings and other components</li> <li>- Historic coatings formulated with lead-based pigments (like rustproofing paints containing red lead, but also colored top coats made with lead chromate/chrome yellow or lead white)</li> <li>- Components made of solid lead (e.g., weights in historic diving equipment or components in medical equipment, historic scientific instruments, or machinery)</li> </ul> <p>Since such objects are important testimonies to the history of technology and mobility, it is of fundamental cultural and societal interest that they can be preserved, publicly displayed, and explained for future generations.</p> <p>In addition to their preservation, their functionality and historical handling is of central importance to understand their historic use and their impact on the society of their time. Therefore, it must also remain possible to experience them in operation.</p> <p>In Germany 648.403 examples can be found as historic motor vehicles (which are licensed as technical cultural heritage in Germany according to § 23 StVZO). The preservation and active presentation of such technical artifacts would be made enormously difficult, and in many contexts probably impossible, by an approval requirement for materials or components containing lead.</p> <p>Historic working techniques used in the manufacture of technical artifacts are often indispensable for keeping them in operation as well as restoring them true to their original condition. This applies in particular to soldering and tinning materials in a wide variety of applications. Only with the appropriate (often lead-containing) materials and historical repair techniques can they be preserved true to their historic appearance and authentically demonstrated in function.</p> <p>Important examples of this is so-called "lead work", which has been contemporarily used in the production of numerous vehicle types. In this process, sheetmetal body parts are formed, sealed, and leveled by partially applying (leaded) solder. Today, "lead-free" solder materials exist, but the temperature range required for their processing is significantly higher and narrower, making them unsuitable for the corresponding application methods. In terms of authentic preservation, these highly specialized traditional craft techniques cannot be replaced by other, modern substitute materials such as polyester putties. The same applies, for example,</p>	<p><b>authorisation will be granted</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
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		<p>to the maintenance and reconstruction of radiators and other parts in the cooling systems on historic vehicles, which are elementary for their operability.</p> <p>Experience has repeatedly demonstrated that complex approval procedures and cost-intensive special permits for such applications cause the few remaining manufacturers of such "niche materials" to cease production. As a result, restorers still experienced in this technique would no longer have the opportunity to apply their important knowledge for preserving the artifacts and pass on these skills to the next generation. Not only would the niche materials become unavailable, but the knowledge to use them would also be lost.</p> <p>The preservation and restoration of countless technical cultural assets does not only take place within the framework of state institutions such as the large technical museums or the state offices for the preservation of historical monuments. Instead, such projects are often initiated and commissioned by small local museums, vintage car clubs or private collections. They invest great personal effort, but often with limited financial resources. The institutions responsible for the individual case examinations in this area in the future will clearly will be overwhelmed with the effort of case-by-case assessments. This too would cause the loss of numerous important objects related to the history of technology and mobility, which could then no longer be preserved, stored or displayed. In addition to this history of technology and mobility will not be accessible to private individuals who are interested.</p> <p>The toxicity of lead and lead-containing materials is very well known, and the resulting health risks are already responsibly managed by manufacturers and restorers worldwide. The use of exhaust systems, appropriate protective equipment and other precautions during processing ensure that professionals working on technical cultural property do so safely and without risk. Furthermore, well-established disposal and recycling cycles have long existed for worn-out lead-containing components and residues from the processing of lead.</p> <p>I therefore urge ECHA and the European Commission to exempt lead and lead-containing materials used in the conservation, storage, presentation, and restoration of historic Technical Heritage Assets such as historic vehicles from the proposed ban. Such a ban would cut off the preservation and presentation of such artifacts in many museum collections and through private individuals. The effects of such a ban would inevitably lead to the loss of numerous significant examples to our shared history of technology and mobility.</p> <p>Yours sincerely, Carsten Müller, MdB</p> <p><a href="#">4150_ECHA_20220429.pdf</a></p>	
<p>4151 2022/04/29</p>	<p>ART STAINED GLASS, Company,</p>	<p><a href="#">4151_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	

	Belgium		Please see response to comment # 3862
4152 2022/04/29	State Office for Heritage Management and Archaeology Saxony-Anhalt, Regional or local authority, Germany	<a href="#">4152_2022-04-29_LDA-LSA_EU-VErbot_von_Blei.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p>
4153 2022/04/29	Kaliber magazine, Other contributor, Hungary	<p>The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).</p> <p>There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p>



		<p>The overall effect of the metallic lead bullets on the environment is negligible, practically ZERO. The social and economical impact is totally unproportional.</p> <p>We will fight against this ban and WILL NOT COMPLY.</p>	<p><b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p>
4154 2022/04/29	Individual, Hungary	<p>The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!). There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.</p> <p>I have a gunshop, which is ensure me and my family's livelihood, so if we can't sell ammunitions, bullets because of the restrictions, we have to close.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.</p> <p>We will fight against this ban and WILL NOT COMPLY.</p>	<p>Please see response to comment # 4153</p>
4155 2022/04/29	Individual, Hungary	<p>This planned LEAD ban is an attack against personal freedom and freedom in Europe. In these uncertain times the LEAD ban will be harmful and against Europe's interest.</p> <p>The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.</p> <p>I will not comply.</p>	<p>Please see response to comment # 4153</p>
4156 2022/04/29	VVDP-ART Comm. V. - Oil Paintings and Stained Glass, Company, Belgium	<p><a href="#">4156_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>  <i>Confidential attachment removed</i></p>	<p>Please see response to comment # 3862</p>
4157 2022/04/29	ESCRBC de Catalunya, Academic institution, Spain	<p><a href="#">4157_Letter MMA.pdf</a></p>	<p>Please see response to comment # 3585</p>

4158 2022/04/29	Individual, United Kingdom	<p>Lead, cast, milled or extruded into lead comes or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), Brussels and Antwerp cathedrals (Belgium), Canterbury Cathedral and York Minster (United Kingdom), Leon and Girona Cathedrals (Spain), the National Cathedral, Washington DC (USA), and is among the greatest treasures of museums including the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow) to name but a few. While leaded stained glass grew to cultural prominence in medieval Europe and enjoyed a massive revival in the nineteenth century, it is now practiced all over the world and has attracted modern artists of the international stature of Marc Chagall, Georges Braque, John Piper, Johannes Schreier, Georg Meistermann, Brian Clarke and Narcissus Quagliata.</p> <p>Its malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the historic windows of our heritage sites and museums could not be repaired, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form.</p> <p>The toxicity of lead is well-understood and its risks to health are effectively managed by stained glass designers, fabricators and conservators all over the World. Regular blood testing, use of extraction and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk.</p> <p>We strongly urge the European Commission to exclude the use of lead in the fabrication and conservation of stained glass from its proposed ban. Not only would this ban wipe out the livelihoods of artists in glass, craftspeople involved in fabrication and conservators involved in the care of heritage assets in Europe, but its effects would be felt throughout the world, sealing the eventual death sentence of one of the most glorious art forms known to mankind.</p> <p>With best wishes,</p> <p>Eur Eng Eur Geol Jim Cook BSc MSc C Eng FICE C GeolFGS</p>	Please see response to comment # 3585
4159 2022/04/29	Kunstkonserveringen (Art Conservation Center Denmark), Company,	<p><a href="#">4159. Brev vedr. brug af bly indenfor konservering og restaureringsfaget SIGNED.pdf</a></p>	Please see response to comment #

	Denmark		3585
4160 2022/04/29	Museumsdorf Hösseringen, Academic institution, Germany	<a href="#">4160_Brief_Bleiglas_EU-Agency.pdf</a>	Please see response to comment # 3585
4161 2022/04/29	Ev.-luth. Pfarramt St. Nicolai 31157 Sarstedt, Other contributor, Germany	<p>Sehr geehrte Damen und Herren, Sie streben an, Blei als genehmigungsnotwendigen Verarbeitungstoff einzustufen. Sie werden angesichts der möglichen Gefährdungslage gute Gründe dafür haben. Als Inhaber des Pfarramtes einer Kirche aus dem Jahr 1457 und als Gemeindevorstand sind wir für den Erhalt dieses Bauwerkes verantwortlich und insofern denkbare Betroffene Ihrer angestrebten Neuregelungen. Die historischen hohen Fenster unserer Kirche sind allesamt bleiverglast. So ähnlich geht es den Zuständigen für Zehntausende von Kirchen allein in Deutschland. Ich bitte Sie diesen weit gefassten Auftrag der Kirchen zum Erhalt von architektonischem und religiösem Kulturgut bei Ihrer Gesetzesformulierung zu bedenken und Ausnahmegenehmigungen zu ermöglichen. Mit freundlichen Grüßen, Matthias Fricke-Zieseniß Pastor an St. Nicolai Ev.-luth. Pfarramt Kirchplatz 4 31157 Sarstedt</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4162 2022/04/29	TGK, Company, Germany	<a href="#">4162_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais(0).pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4163 2022/04/29	La Maison du Vitrail, Company, France	<a href="#">4163_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4164 2022/04/29	EURL VITRAUX DUPUY, Company, France	<a href="#">4164_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4165	Fondation du patrimoine,		

2022/04/29	Academic institution, France	<a href="#">4165 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4166 2022/04/29	Bushy Park Ironworks, Company, Ireland	<a href="#">4166 Petition Letter for Ironworkers.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4167 2022/04/29	Vitrail Naud, Company, France	<a href="#">4167 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4169 2022/04/29	Individual, France	<a href="#">4169 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4170 2022/04/29	Slovakia, Member State	SK CA agrees that lead (EC 231-100-4) represents a substance of very high concern whose uses should be minimised to the extent possible. However, we do not support recommendation of lead for inclusion in Annex XIV for the following reasons. Most of the uses falling in the scope of authorisation are related to the use of lead in batteries (84%). The options for regulatory measures for the use of lead in batteries are currently being addressed in the framework of new Batteries Regulation that is under the development. SK CA, together with other MSs, supports the approach to have a single regulation of the restriction of substances in batteries (including lead) according to new Batteries Regulation, that will cover the whole life cycle of batteries (production, use and including the waste phase). The agreement on such an approach was not simple and ensures a good and sensitive balance reached so far during the discussions on the	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>

		<p>draft Batteries Regulation.</p> <p>Furthermore, legislation regulating the use of lead in various applications is already in force, for instance under REACH several restrictions exist. We are not convinced that the authorisation is the most appropriate way to regulate lead uses, e.g. it could hamper recycling of lead containing materials. In addition, authorisation constitutes disadvantages for EU companies comparing to non-EU ones as it is applicable only to EU uses and doesn't cover the import of articles. Also the authorisation we perceive cumbersome which poses a disproportionate burden on industry (especially on SMEs) as well as on authorities (Commission and CAs).</p> <p>Occupational safety and health is addressed by Occupational Exposure Limits (OELs) for lead and lead compounds.</p> <p>In justified cases, if the risk associated with the use of lead is demonstrated, we prefer to apply targeted restrictions to protect human health and the environment. As regards the regulation of chemicals in general, we highly encourage to apply a holistic approach, i.e. application of the most appropriate sectoral legislation for specific uses of chemicals.</p>	<p><b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b>  <b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD</b>  <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>  <b>C.2.02 Request for exemption under Art. 58(2) based on the</b></p>
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			<b>future Batteries Regulation</b>
4171 2022/04/29	Individual, France	<a href="#">4171_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais copie.pdf</a>	Please see response to comment # 3862
4172 2022/04/29	Individual, France	<a href="#">4172_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4173 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4173_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais copie.pdf</a>	Please see response to comment # 3862
4174 2022/04/29	cr�ations lepetitfr�re, Company, France	<a href="#">4174_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4175 2022/04/29	La Maison du Vitrail, Company, France	<a href="#">4175_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4176 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4176_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais copie.pdf</a>	Please see response to comment # 3862
4177 2022/04/29	Individual, France	<a href="#">4177_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4178 2022/04/29	State Office for Heritage Management and Archaeology Saxony-Anhalt,	<a href="#">4178_2022-04-29_LDA-LSA_Ausnahmeregelung_Blei_Bau- und Kunstdenkmalpflege.pdf</a>	

	Regional or local authority, Germany		Please see response to comment # 4152
4179 2022/04/29	L'Art du Vitrail, Company, France	<a href="#">4179_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4180 2022/04/29	Museumsverband Rheinland- Pfalz e. V., National NGO, Germany	<p>Das Material Blei wurde aufgrund seiner Vorzüge in der Vergangenheit für eine große Vielfalt kultureller Gegenstände verwendet, die heute in Museen und anderen Kulturgut bewahrenden Einrichtungen aufbewahrt und präsentiert werden. Es ist nicht nur ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern – einer Kunstform mit einer tausendjährigen Geschichte, verwendet an weltberühmten Bauwerken wie der Kathedrale Notre-Dame de Paris, aber auch in kleinen und größeren Kirchenbauwerken in Deutschland.</p> <p>Auch noch viele weitere, unscheinbarere Objekte werden heute in Museen aufbewahrt, die einen wichtigen Teil unseres kulturellen Erbes bilden und für die Blei verwendet wurde: Mittelalterliche Bleisiegel, Druckplatten, Bleibarren aus historischen Abbaugebieten, sogenannter Tarierschrot (in Apotheken verwendet), Spielfiguren aus Blei, Kronleuchter, Bleimarken und -plomben, Münzen, Gewichte, Schleuderkugeln der Inka, Pilgerzeichen und Pilgerampullen des Mittelalters, kleine figürliche Darstellungen verschiedener Epochen und Kulturen, historische, vergoldete Wandleuchter des 18. Jahrhunderts, antike sogenannte „Fluchtäfelchen“ und Sarkophage aus Blei.</p> <p>Diese genannten Objekte aus oder mit Blei sind nur einige Beispiele und sie werden von 20 deutschen Museen und musealen Einrichtungen auf der Plattform „museum-digital.de“ mit dem Schlagwort „Blei“ als Teil ihrer Sammlung präsentiert: <a href="https://nat.museum-digital.de/objects?tag_id=2324">https://nat.museum-digital.de/objects?tag_id=2324</a></p> <p>In Deutschland gibt es jedoch nach der offiziellen Statistik des Instituts für Museumsforschung, Berlin, über 7.000 Museen – und wahrscheinlich haben sehr viele oder sogar die meisten von ihnen kulturhistorisch oder naturgeschichtlich bedeutsame Objekte mit oder aus Blei in ihren Sammlungen.</p> <p>Museen beschäftigen oder beauftragen Restauratoren mit der Konservierung bzw. Restaurierung von Objekten aus oder mit Blei – ein Verbot des Umgangs mit Blei würde die Arbeit dieser Restaurator:innen bedrohen. Die Toxizität von Blei und seinen Korrosionsprodukten ist gut bekannt, die Gesundheitsrisiken werden von fachlich ausgebildeten Restaurator:innen durch entsprechende Schutzmaßnahmen wirksam gehandhabt.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>

		<p>Museen präsentieren kultur- und naturhistorisch bedeutsame Objekte aus Blei in ihren Ausstellungen oder bewahren sie für zukünftige Generationen in ihren Depots auf. Ein Verbot der Verwendung von Blei für den Erhalt dieser Objekte würde sich negativ auswirken. Der Umgang mit Objekten aus Blei muss ohne Sondergenehmigungen möglich sein, damit Museen ihren kulturellen Auftrag auch in Zukunft umfassend erfüllen können.</p> <p>Der Museumsverband Rheinland-Pfalz bittet Sie daher um eine Ausnahmeregelung für die Verwendung von Blei an Kunst- und Kulturgut sowie für den Umgang mit Objekten aus Blei an Museen, die diese Objekte sammeln, bewahren, erforschen und vermitteln.</p>	
4181 2022/04/29	La Maison du Vitrail, Company, France	<a href="#">4181_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4182 2022/04/29	Individual, France	<p>If ever the lead had to be registered, the deadlines for the stained glass window are much too short</p> <p><a href="#">4182_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais copie.pdf</a></p>	Please see response to comment # 3862
4183 2022/04/29	Individual, France	<p>If ever the lead had to be registered, the deadlines for the stained glass window are much too short</p> <p><a href="#">4183_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais copie.pdf</a></p>	Please see response to comment # 3862
4184 2022/04/29	La Maison du Vitrail, Company, France	<a href="#">4184_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4185 2022/04/29	European Writing Instrument Manufacturer's Association - EWIMA, Industry or trade association, Germany	<a href="#">4185_EWIMA contribution ECHA consultation Pb in Annex XIV.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p>



			<b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4189 2022/04/29	Individual, Belgium	<a href="#">4189_Miroiteries Montoises1.pdf</a>	Please see response to comment # 3585
4190 2022/04/29	GKTECHNIQUES /ESPACE VERRE, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4190_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4191 2022/04/29	Individual, Belgium	<a href="#">4191_Vigoureux1.pdf</a>	Please see response to comment # 3585
4192 2022/04/29	Individual, Belgium	<a href="#">4192_Glaswerken Gheysens1.pdf</a>	Please see response to comment # 3585
4193	Individual,		

2022/04/29	Belgium	<a href="#">4193_Glaswerken_Gheysens1.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
4195 2022/04/29	Individual, Belgium	<a href="#">4195_Van_Lierde1.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
4196 2022/04/29	GHC Gerling, Holz & Co. Handels GmbH, Company, Germany	No Comments.	-
4197 2022/04/29	Individual, France	<a href="#">4197_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4198 2022/04/29	Individual, France	<a href="#">4198_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4199 2022/04/29	ATELIER DE VITRIL GWENGLASS, Company, France	<a href="#">4199_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4200 2022/04/29	Individual, France	<a href="#">4200_Re_Vitrail_patrimoine_en_danger.zip</a>	Please see response to comment # 3862
4201 2022/04/29	Landesamt für Denkmalpflege Sachsen, National Authority, Germany	<a href="#">4201_LFD-SRV-PRINTSE_4_OG_Poststelle_1578_001.pdf</a>	Please see response to comment # 3585
4202 2022/04/29	MEDENUS Gas- Druckregeltechnik GmbH,	Dear Sir or Madam, in the manufacture of aluminum turned parts, lead is added to the appropriate aluminum alloys	

	Company, Germany	<p>in order to achieve improved machinability and to ensure a certain surface quality. The use of lead as a substance here is limited to the industrial sector and does not include any use by end users. In addition, the handling in the gas sector from several decades of experience in the field is absolutely uncritical to look at in every respect.</p> <p>The current intentions to put even these small amounts of lead on the list of materials subject to approval massively thwarts the efforts to stimulate the economy, as there is no substitute for the use of lead. The situation on the procurement market is thus getting worse. Furthermore an additional competitive disadvantage compared to non-EU competitors is created and domestic production is permanently weakened, as products/parts containing lead can simply be imported without providing any evidence of how much lead is contained, let alone limiting this level.</p> <p>The initiative also clearly misses the target in terms of the fact that the regulations already in force have a sufficient limit on the proportion of lead and the circular economy of recycled parts, chips through machining etc. are already conscientiously fed back into the cycle in the production process. Due to the current raw material prices, the recycling rates are higher than ever before.</p> <p>Ultimately, it is yet another example of bureaucracy-building, competitive disadvantages, and unrealistic regulation, while other parts of the world happily continue processing lead in every respect and then imported into the EU.</p> <p>We, MEDENUS Gas-Druckregeltechnik GmbH, as a manufacturer of high-quality aluminum fittings in the gas sector, are very skeptical about the further tightening of the approval for products containing lead, which we believe is unnecessary and which we decline. If prosperity and jobs in the production location Germany as part of the EU are to be secured in the long term, a further tightening of these licensing requirements is highly counterproductive. Thank You for Your attention.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p>
4203 2022/04/29	Pyrallis srl, Company,	<p><a href="#">4203_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	

	Belgium	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4204 2022/04/29	Heeresgeschichtliches Museum/Militärhistorisches Institut, Academic institution, Austria	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4205 2022/04/29	Detection Technology Plc, Company, Finland	<p>Reasoning for keeping lead as an essential component in application that use ionizing radiation.</p> <p>The principle of removing lead (Pb) as a component in products is a positive development. The negative affects of Pb contamination in the environment and the proven carcinogenic effects on biological tissue are an accepted fact (CITE). Removal of Pb as an additive for gasoline for example had significant positive impact and facilitated technological development of car engines to be not dependent on it.</p> <p>There are however applications that are dependent on the usage of Pb. The shielding against ionizing radiation is the most prominent one.</p> <p>A mandatory radiation safety protection of the operator, patient, and the environment is required for applications that involve ionizing radiation. These applications include amongst others all X-ray devices for diagnostic imaging, luggage scanners at airports and postal stations, or industrial imaging applications. The protection against the ionizing radiation must be ensured and is regulated on the European level by the Euratom (<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02013L0059-20140117">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02013L0059-20140117</a>) directives.</p> <p>This protection is generally realized through the usage of Pb sheets and collimators. The usage of Pb as a material however is not motivated by economic, but by physical reasons. The interaction probability of ionizing radiation in matter is heavily dependent on the atomic number of the element that the radiation is interacting with. For ionizing energies of most applications (up to 160keV), this interaction is dominated by photoelectric absorption. The equation below shows that the effects is proportional to the 4th – 5th power of the element (Z). E is the energy of the photon that is to be absorbed.</p> $\text{Absorption} \cong \text{constant} \times Z^{(4...5)} / (E_{\text{photon}}^{3.5})$ <p>Hence, ionizing radiation interacts with heavy elements substantially more than with lighter elements. Thus, the protective effect of Pb is substantially higher than of the element with the next lower atomic number Thallium (TI) or any light element.</p> <p>Nonetheless, if an element with a lower atomic number than Pb is chosen, then it should not more problematic in terms of hazardousness than Pb already is. Thus, elements such as Mercury (Hg), Cesium (Cs) should be avoided. In addition, the material should be stable at a wide range</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.2. Generic exemptions</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.06 Exemption request for uses in medical devices</b></p>

		<p>of temperatures and pressures. Furthermore, chemical reactions with other components of a product need to be avoided. These and several other requirements reduce the list of potential replacement candidates for Pb to a few common metals. These are mainly: Aluminum (Al), Iron (Fe), Copper (Cu), Tin (Sn), Gold (Au) and Tungsten (W). Please note that Pb is often a trace element in natural occurring metals ores.</p> <p>Based on the equation above, the replacement Pb for a shield against ionizing radiation shield would require an increase of thickness of that shielding by a factor of 65x in case Al is used. Whilst other elements require less increase of the shielding thickness, is some increase compared to Pb needed for all elements with lower atomic number. Substituting a Pb shield with Al for example results in a substantial increase of volume to provide the same level of radiation safety to the operator, patient, or the environment. Furthermore, a device that contains for example a 65x thicker protective layer causes larger products that have further substantial negative impacts onto the environment. For example, less products fit into a transport container, which increases the environmental impact of the product. In addition, other physical aspects need to be considered such as inertia of gantry of a computer tomograph. A larger radiation shielding may render a product unsafe to the operator.</p> <p>Finally, the named elements are needed with higher priority in other applications. Al, Cu are main components in batteries and electronics, e.g. for electric cars, Fe – is main component in most devices that require structural strength, W in X-ray tubes, alloys and collimators or anti-scatter grids for medical imaging devices, Au – is used in electronics devices and as a strategic financial reserve at most governments. Therefore, using these elements for an application where they have no active use, is irresponsible from social, environmental, and economic point of view. Pb however, is the best option as unsurpassed protection against ionizing radiation can be achieved with the least amount of material, environmental impact, and risk to the operator.</p> <p>Therefore, we like to amend the exemption that is already given for usage of Pb in medical products for human or veterinary use, to also include products that require Pb to protect against ionizing radiation.</p>	
		<a href="#">4205_ECHA proposition to remove LEAD completely.pdf</a>	
4206 2022/04/29	Peak District National Park, Regional or local authority, United Kingdom	<a href="#">4206_EN lead letter consultation.docx</a>	Please see response to comment # 3585
4208 2022/04/29	Individual, France	<a href="#">4208_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4209 2022/04/29	L'atelier du vitrail, Company, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4210 2022/04/29	Smiths Detection Germany GmbH, Company, Germany	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.2.36 Attached COM questionnaire</b>
4211 2022/04/29	LWL-Denkmalpflege, Landschafts- und Baukultur in Westfalen, Regional or local authority, Germany	<a href="#">4211_AnfrageECHA_LWL.pdf</a>	Please see response to comment # 3585
4212 2022/04/29	Architectes du Patrimoine, Industry or trade association, France	Use of lead on historical monuments restoration : no other material available for stainglass or maçonery protection.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4213 2022/04/29	Historical Monuments Research Laboratory, Other contributor, France	<a href="#">4213_ECHA_Lead_ICOMOS_ICOM_ECCO_lettertemplate_EN92-AMN.docx</a>	Please see response to comment # 3585
4214 2022/04/29	Individual, France	<a href="#">4214_2022.04.25. - CNSV - Rf@ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4215			

2022/04/29	Historical Monuments Research Laboratory, Other contributor, France	<a href="#">4215 recom com call for info questionnaire en CDC_IL-AMN.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.2.36 Attached COM questionnaire</b>
4216 2022/04/29	Individual, United Kingdom	<a href="#">4216 Comments to ECHA regarding proposed EU Regulations on the Use of Lead.doc</a>	Please see response to comment # 3585
4217 2022/04/29	Individual, France	On ne peut permettre le sacrifice de notre patrimoine, préservé depuis des siècles par nos artisans. En tant qu'apprentie vitrailliste je suis triste et en colère. Cette interdiction m'atteint matériellement en mettant en question mon avenir professionnel, ma vocation, mais elle l'atteint aussi émotionnellement. En effet, si l'on pleurait Notre-Dame lorsqu'elle était en danger, pleurerons nous les grandes verrières de France et d'Europe ? J'espère que nous y échapperons en n'interdisant pas l'usage du plomb, ni en contraignant les ateliers à payer des hauts frais qui tueraient en premiers les petits ateliers et indépendants.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>
4218 2022/04/29	Individual, France	<a href="#">4218_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4220 2022/04/29	Bayerisches Nationalmuseum, Academic institution, Germany	<a href="#">4220_AK Restaurierung_2ECHA.docx</a>	Please see response to comment # 3585
4221	Europa Nostra,		

2022/04/29	International NGO, Netherlands	<a href="#">4221 EN-EHA ECHA Consultation Lead 29042022.pdf</a>	Please see response to comment # 3585
4222 2022/04/29	Chambre Syndicale Nationale du Vitrail, Trade union, France	<a href="#">4222 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4223 2022/04/29	Individual, France	<a href="#">4223 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4224 2022/04/29	BURLET VITRAUX, Company, Switzerland	<a href="#">4224 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4225 2022/04/29	Individual, France	<a href="#">4225 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4226 2022/04/29	Zentralverband Sanitär Heizung Klima, Other contributor, Germany	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>



4227 2022/04/29	ICOM Belgique/Wallonie- Bruxelles, National NGO, Belgium	<a href="#">4227_ECHA_Lead_ICOM-BWB.pdf</a>	Please see response to comment # 3875
4228 2022/04/29	ICOM Belgium, National NGO, Belgium	<a href="#">4228_ECHA_Lead_ICOM-Belgium.pdf</a>	Please see response to comment # 3875
4229 2022/04/29	WATTELIER Clotilde, Company, France	<a href="#">4229_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4231 2022/04/29	Glaswerkstätten F. Schneemelcher, Company, Germany	<a href="#">4231_Anschreiben an ECHA.pdf</a>	Please see response to comment # 3585
4232 2022/04/29	Immobilière Champs Elysées, Company, France	<a href="#">4232_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4233 2022/04/29	Steeltec, Company, Germany	<p>Steeltec is of the opinion that including lead in the Annex VIX of the REACH regulation would not be conducive to achieving the objectives pursued by the European Commission and the socio-economic harm deriving from such a decision would be disproportional in light of the very limited benefits in protecting human health and the environment.</p> <p>The current legal framework is sufficient in protecting the environment and human health from the hazards posed by lead. There are comprehensive, binding and enforceable legal requirements for the protection of human health and the environment for the use of lead in context of the industrial production of leaded steels. This holds true in the area of environmental protection (e.g. Emissions Directive/Air Pollution Control Ordinance, Water Protection Act, etc.) and with regard to workplace health and safety laws and regulations. There are binding exposure limit values (MAK) and biological limit values (BAT) in place for lead, supported by additional measures such as periodic medical monitoring.</p> <p>Considering the limited part of leaded steel in the overall lead pollution in the EU, an additional REACH approval requirement has no additional positive effect, but could entail significant negative socio-economic consequences along the value chain, including loss of employment and</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p>

		<p>interruption of production in key sectors (such as the automotive industry). Moreover, undesirable side effects could be expected as potential alternatives are likely to cause further harm to human health and the environment. Consequences of banning the use of lead will include:</p> <ul style="list-style-type: none"> <li>• Machining productivity will drop, resulting directly in higher component costs of around 30% and potential relocation of production outside of the EU.</li> <li>• The energy required to produce steel components is expected to increase and the industry's energy consumption is likely to increase accordingly, in a context of uncertainty around energy prices and supply.</li> <li>• The quality of the impacted steel products is likely to deteriorate leading to further challenges for downstream processors.</li> <li>• Additional investments (machines, production surface) will be needed to compensate for lower productivity, against the backdrop of decreasing attractiveness of our sector for investors.</li> <li>• This entails a significant loss of competitiveness for the European industry, leading to a drop in market share and subsequent losses in employment along the European value chain due to relocation of production outside of Europe.</li> </ul> <p>Considering the limited part of leaded steel in lead pollution, the existing strong legal framework, a closed steel recycling loop, and the absence of viable alternative leading to substantial socio-economic harm, we are convinced that the demonstrated downsides of a listing in annex XIV significantly outweigh hypothetical benefits.</p>	<p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
4234 2022/04/29	Society for the Protection of Ancient Buildings, Other contributor, United Kingdom	<p>Please see below</p> <p><a href="#">4234_SPAB Comments on Proposed EU Regulations on Lead Use 2022.04.29.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>

			<b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4235 2022/04/29	Individual, United Kingdom	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4237 2022/04/29	AU PASSEUR DE LUMIERE, Company, France	<a href="#">4237_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4238 2022/04/29	Historisches Museum Basel, Academic institution, Switzerland	<a href="#">4238_ECHA_Bleiverbot_HMB_20220429.pdf</a>	Please see response to comment # 3585
4239 2022/04/29	ABB Oy, Company, Finland	Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.  Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.  Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.  For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"  <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b>

			<p><b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b></p> <p><b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b></p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b></p> <p><b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p> <p><b>B.2.01. Request extra long LAD</b></p>
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			<p><b>B.2.07 Phasing of LAD and sunset dates (SSD) for complex objects supply chains</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
4240 2022/04/29	Création de vitraux Marie MAROT-SIX , Company, France	<a href="#">4240_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4241 2022/04/29	Individual, Germany	The EU wide ban of lead as bullet material, for target shooting is not acceptable for Germany, hence the shooting ranges in Germany are equipped with bullet traps, that avert lead contamination of the natural environment. This is valid for outdoor and indoor shooting ranges. In addition, the lead contamination of participants using indoor ranges is prevented by corresponding air extraction systems.	Please see response to comment # 4086
4242 2022/04/29	Individual, France	<a href="#">4242_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4243 2022/04/29	Individual, France	<a href="#">4243_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4244 2022/04/29	Thierry GILHODEZ, Company, France	<a href="#">4244_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4245 2022/04/29	Individual, Portugal	<a href="#">4245_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4246 2022/04/29	Individual, France	This will destroy an ancient and living art. How will the great cathedrals of Europe be repaired, like Notre Dame, Paris?	Please see response to comment # 3862
4247 2022/04/29	Individual, France	<a href="#">4247_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4248 2022/04/29	Worshipful Company of Blacksmiths, Other contributor, United Kingdom	<p>The European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finland 28 April 2022 Dear Colleague,</p> <p>Appeal for Derogation in Respect of proposed EU Regulations on the Use of Lead which would impede highly skilled blacksmith craftsmen and conservators from practising their profession and thereby pose a threat to the future of our metalworking [REACH Annex XIV, EC Number 231-100-4]</p> <p>I write as the Prime Warden of the Worshipful Company of Blacksmiths which, for over 700 years, has represented the interests of blacksmiths who are highly skilled craftsmen creating many types of objects from different basic metals such as iron, other metals, and their alloys . Over those centuries, many techniques have evolved in the use of these metals, however lead has never been supplanted as a basic material offering all the physical properties needed for the fabrication of specific constructions.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>C.1.3. Aspects not justifying an</b></p>

		<p>Our blacksmiths, as highly skilled craftsmen working with metals and in particular using lead for caulking and sealing particular joints, are fully aware of the safety requirements in the use of this particular metal.</p> <p>Facilities and procedures are in place to ensure that the risk to themselves and others is minimal. However, blacksmithing work is often undertaken in forges or at open sites, and sometimes during the renovation historic structures. Imposing strict licensing conditions would bring a huge administrative burden upon a craft already under stress. We cannot afford to lose those highly skilled craftsmen maintaining our heritage and creating new for the future.</p> <p>I therefore request for a Derogation covering the supply and use of lead-based materials used in the art of blacksmithing be considered as part of any new regulations.</p> <p>Yours faithfully,</p> <p>Jim Cook Prime Warden The Worshipful Company of Blacksmiths</p>	<b>exemption from authorisation</b>
		<a href="#">4248_2020 Letter to Finland.pdf</a>	
4249 2022/04/29	Individual, France	<a href="#">4249_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4250 2022/04/29	Atelier Nicolas Charles, Company, France	<a href="#">4250_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4251 2022/04/29	ICOMOS Ireland, National NGO, Ireland	<a href="#">4251 Letter re. ECHA's plan to include lead in the list of substances subject to authorisation (3).pdf</a>	Please see response to comment # 3585
4252 2022/04/29	Individual, France	<a href="#">4252_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4253 2022/04/29	The British Academy, Academic institution,	<a href="#">4253_BritishAcademy.pdf</a>	

	United Kingdom		Please see response to comment # 3585
4254 2022/04/29	Deutsches Optisches Museum / German Optical Museum, Academic institution, Germany	<a href="#">4254_20220429_Verwendung von Blei_Europäische Kommission_DOM_ECHA.pdf</a>	Please see response to comment # 3585
4255 2022/04/29	YXLON International GmbH, Company, Germany	<a href="#">4255_recom_com_call_for_info_questionnaire_en_29-04-06public.docx</a> <i>Confidential attachment removed</i>	<b>A.2.36 Attached COM questionnaire</b>
4256 2022/04/29	HELLA GmbH & Co. KGaA, Company, Germany	As Lead is already heavily regulated and restricted over twenty years (ELV, RoHS and REACH Annex XVII), we propose the prioritisation of other SVHCs, which are not regulated.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b>
4257 2022/04/29	Individual, France	<a href="#">4257_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4258 2022/04/29	BIC, Company, France	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4260 2022/04/29	Individual, France	<a href="#">4260_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4262 2022/04/29	Monument Vandekerckhove N.V., Company,	<a href="#">4262_H2O - The European Chemicals Agency (ECHA) - MG - 29.04.2022 - 084 - Protest.pdf</a>	



	Belgium		Please see response to comment # 3585
4263 2022/04/29	Individual, France	<a href="#">4263_2022.04.25. - CNSV - R--ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4264 2022/04/29	Compagnie des Architectes en Chef des Monuments Historiques, Other contributor, France	<a href="#">4264_Note sur le plomb dans le patrimoine.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4266 2022/04/29	Individual, United Kingdom	<a href="#">4266_Stained glass and lead letter Appeal FM.pdf</a>	Please see response to comment # 3585
4267 2022/04/29	Individual, Hungary	<p>The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).</p> <p>There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.</p> <p>We will fight against this ban and WILL NOT COMPLY.</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>

			<p><b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4269 2022/04/29	Individual, France	<a href="#">4269_2022.04.25. - CNSV - Rf@ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4270 2022/04/29	Individual, Germany	<a href="#">4270_Zulassungspflicht für Blei deutsch.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b>  <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b>  <b>C.1.3. Aspects not justifying an</b></p>

			<b>exemption from authorisation C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4271 2022/04/29	Individual, France	<a href="#">4271_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4272 2022/04/29	Bayerisches Landesamt für Denkmalpflege, Regional or local authority, Germany	<a href="#">4272_BLFD_AV_Met_JS_objection_lead_ECHA.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4273 2022/04/29	Daniëlle Merks glas-in-lood atelier, Company, Netherlands	<a href="#">4273_Voorbeeldbrief aan ECHA Europese commissie.docx.doc</a>	Please see response to comment # 3585
4274 2022/04/29	Icon (Institute of Conservation), National NGO, United Kingdom	Our attention has been drawn to the draft recommendation for lead to be included in Annex XIV of the authorisation list by our colleagues at ICOMOS. We share their concerns about the potential adverse impact of this proposal on the conservation of cultural heritage and we echo their call for the use of lead in conservation practice to be exempted from onerous and unnecessary control processes.	Please see response to comment # 3875

		<p>Icon (the Institute of Conservation) is a charitable company working to safeguard cultural heritage. We are also the professional membership body for the conservation profession supporting our 2,300 members, who are mostly based in the UK, although a significant proportion (18%) work in Europe and elsewhere. Our vision is to protect, preserve and promote our treasured cultural heritage through cultivating skilled conservation professionals, supporting meaningful collaboration across the cultural heritage sector, and delivering public benefit through engagement and advocacy.</p> <p>We have consulted with our members and with other colleagues working in conservation practice in the UK and we now wish to submit the following comments.</p> <p>Lead has been used in the construction of buildings for at least 2,000 years and continues to be used for the conservation and repair of historic structures including houses, churches, factories, offices, commercial premises and state buildings. The range of uses is extensive and includes sheet lead roofing, waterproofing details, fixing of stone masonry, leaded windows, and fittings for rainwater disposal. The longstanding use of traditional lead-based paints (currently controlled through the REACH Enforcement Regulations) should also be mentioned.</p> <p>In addition to these practical uses of lead, our built environment bears testimony to the extensive decorative use of the material in the form of stained-glass windows, which are one of the artistic highlights of the UK's outstanding heritage of historic parish churches, great cathedrals and fine civic buildings.</p> <p>The role of conservators is to care for all aspects of historic buildings and their decorative fixtures; repairing, and sometimes restoring, elements as needed. In order to fulfil this task conservators, and associated professionals, must be able to work with lead without hinderance from disproportionate or punitive bureaucracy and regulation.</p> <p>The proposed change in the REACH regulations poses a particular challenge for stained-glass conservators, who are represented by Icon's Stained-Glass Group. These skilled professionals handle lead on a daily basis and are already competent to ensure that this work is carried out safely and with minimum risks to their health.</p> <p>The members of Icon's Stained-Glass Group believe that the inclusion of lead in Annex XIV would have a considerable detrimental effect on the stained-glass manufacturing and conservation industries both in the UK and globally and urge the reconsideration of this harmful proposal. Practitioners cannot conserve and repair our internationally important collection of stained-glass windows without using lead. There is simply no equivalent material that can replace the lead comes that support the glass in our windows. No modern material matches lead's performance and longevity, and so this is not just an ethical issue about preserving access to materials that are historically and aesthetically appropriate for conservation work, but also one of practicality.</p>	
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4275 2022/04/29	TERVAS, Other contributor, France	<p><a href="#">4275 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4276 2022/04/29	Individual, France	<p><a href="#">4276 2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4277 2022/04/29	Individual, France	<p><i>Confidential attachment removed</i></p>	
4278 2022/04/29	Individual, France	<p><a href="#">4278 2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4280 2022/04/29	CLOVIS VITRIL, Company, France	<p><a href="#">4280 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 3862
4281 2022/04/29	MedTech Europe, Industry or trade association, Belgium	<p>Please refer to the attached submission.</p> <p><a href="#">4281 MedTech Europe submission Lead REACH Annex XIV.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p>

			<p><b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b> <b>C.1 Process information</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.2. Generic exemptions</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b> <b>C.2.06 Exemption request for uses in medical devices</b> <b>C.2.22 If SRD use C.2.08, if medical device C.2.11: Exempt uses in various applications related to medical, optics, analytical, bio and</b></p>
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			<b>laboratory technologies</b>
4283 2022/04/29	Individual, France	<a href="#">4283_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4284 2022/04/29	Individual, France	<a href="#">4284_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4286 2022/04/29	ICOMOS - International Council on Monuments and Sites / ICOM - International Council of Museums / E.C.C.O. , the European Confederation of Conservator-Restorers' Organisations, International NGO, France	<a href="#">4286_ECHA_Lead_ICOMOS_ICOM_ECCO_JointStatement_20220426_FR.zip</a>	Please see response to comment # 3875
4287 2022/04/29	GRA, Company, Germany	Point 2 pf PRIORITISATION APPROACH is important: Replace only if suitable alternatives are technically and economically feasible. <a href="#">4287_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of</b>

			<b>lead for its inclusion in Annex XIV</b>
4288 2022/04/29	Individual, France	<a href="#">4288_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4289 2022/04/29	Individual, France	<a href="#">4289_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4290 2022/04/29	Individual, France	<a href="#">4290_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4291 2022/04/29	Driemond Glas, Company, Netherlands	<a href="#">4291_ECHA-loodvrijstelling-Driemond Glas.pdf</a>	Please see response to comment # 3585
4292 2022/04/29	Individual, Germany	Das Bleiverbot darf nicht kommen. Das wird das ganze Schützen und Jagdwesen zerstören. Das Schützen und Jagdwesen ist ein Kulturgut welchen geschützt und Unterstützt werden muss	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4293 2022/04/29	Individual, France	<a href="#">4293_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825(1).zip</a>	Please see response to comment # 3862
4295 2022/04/29	Couleurs et Lumieres, Company, France	<a href="#">4295_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #



			3862
4296 2022/04/29	Individual, Germany	Als ob es nicht wirklich wichtige Dinge gäbe. So lange es keine Alternativen zu Blei gibt, ist ein Verbot ein übermäßiger Eingriff in so viele Bereiche des Lebens aller Bürger.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4297 2022/04/29	Individual, France	<a href="#">4297_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4298 2022/04/29	Individual, France	<a href="#">4298_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4299 2022/04/29	Individual, France	<a href="#">4299_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4300 2022/04/29	Individual, Germany	Blei lässt sich derzeit durch keinen anderen Stoff ersetzen	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4301 2022/04/29	Individual, Germany	Es ist nicht möglich mit bleifreier munition als sportschütze optimale Ergebnisse zu erzielen! Außerdem sind unsere Waffen dafür nicht geeignet!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4302 2022/04/29	Netherlands, Member State	for repairing stained glass in Europe .	Thank you for your opinion.

4303 2022/04/29	Individual, Austria	Bitte verbieten sie Bleimunition nicht! Blei kapselt sich unter Luft ab. In diesen Zustand lagert es auch seit Jahrtausenden in der Erde	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b>
4304 2022/04/29	Florence Bonazzi stained glass, Company, France	<a href="#">4304_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4305 2022/04/29	Individual, Germany	In times of scares resources it is not recommended to say goodbye to lead. The use of lead is nearly everywhere. Medical Instruments, cars (weights for Tires, batteries etc.); Shields against radiation; And the for me: It is the best material for bullets. In Germany there is a new advise to save our woods and therefore we need to shoot more animals and train more. The alternatives to lead ammunition for cheap training is not manageable or payable. Also if lead will be banned from the market the prices for alternative materials will jump through the skies. Lead is its purest form toxic in huge masses, yes, but the process for other materials in much appliances are much worse in the production and everything else. The amount of energy and the destruction of our planet to get those scarce materials is even worse than use lead. The better way would be a better controlled recycle process for lead. With kind regards, Robert.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b>
4306 2022/04/29	Individual, Germany	Bei allen Verboten "die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen"	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4307 2022/04/29	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4308 2022/04/29	Individual, Germany	stop Leadban. Sportshooting needs lead	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

			<b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4309 2022/04/29	Asociación Nacional del Arma - ANARMA, National NGO, Spain	Very important: "Article 55 of REACH explicitly stipulates that applicants for authorisation shall analyse the availability of alternatives and consider their risks, and the technical and economic feasibility of substitution " <a href="#">4309_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	Please see response to comment # 4287
4310 2022/04/29	Individual, Finland	There are already ongoing restriction procedures for certain uses of lead that have not been studied correctly, or still strong lack scientific underpinnings. Since already a large part of the big causes of lead poisoning have been handled it is probably worth waiting to identify and if needed remedy issues with the reduced use of lead.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>
4311 2022/04/29	Individual, Belgium	<a href="#">4311_2022.04.25. - CSNV - Réponse consultation ECHA - Courrier d'accompagnement-1.pdf</a>	Please see response to comment # 3862
4312 2022/04/29	Individual, Germany	<a href="https://german-rifle-association.de/wp-content/uploads/2020/07/Pro-und-Kontra-zum-Bleiverbot.pdf">https://german-rifle-association.de/wp-content/uploads/2020/07/Pro-und-Kontra-zum-Bleiverbot.pdf</a> <a href="#">4312_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	Please see response to comment # 4287
4313 2022/04/29	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4314	Individual,	The prohibition of lead would end all sport shooting activities and ruin the adhering industry!	

2022/04/29	Austria		<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4315 2022/04/29	Individual, Germany	Es gibt keine auch nur annähernd gleichwertige Alternative für Blei.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4316 2022/04/29	Individual, Germany	The ban of lead in ammunition would never ever be a solution for less toxic parts in the nature! Hunters and sportshooters are also NOT the problem with lead in the nature. There are also no alternatives to lead ammunition for hunting! Only lead bullets have a total deadly function in a millisecond. All other stuffs are not as deadly as lead. And this is not good for the animals. So, don't ban lead in bullets (and other categories) - it is not as dangerous, as the ECHA is trying to tell us!! Animals	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4317 2022/04/29	Individual, France	<a href="#">4317_CNSV - réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4319 2022/04/29	Individual, Canada	<a href="#">4319_Stained-glass-and-lead-to-The European Chemicals Agency (ECHA).pdf</a>	Please see response to comment # 3585
4320 2022/04/29	julie Bernard ( micro entreprise ), Company, France	<a href="#">4320_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4321 2022/04/29	Individual, Belgium	<a href="#">4321_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4322 2022/04/29	Individual, Germany	Banning lead in ammunition is a major issue for the whole European Union. The predicted outcome to reduce the incorporation of dangerous material is not as positive as described by ECHA. The issue is that there are no actual alternatives to lead ammunition that are less harmful for organisms and provide the same effectiveness. In contrast the current alternatives for hunting ammunitions pose an actual threat to the surroundings due to a higher risk of ricochets because of way harder metals used for the bullets. That is the reason, why some countries already cancel their legislation to ban lead ammunition. Also there is a study from the Würzburg university proving that the impact of lead ammunition in wetlands is even less harmful for the environment than the current alternatives because a corrosive layer is built around the lead bullet and therefore stops the lead from being	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4323 2022/04/29	Individual, Netherlands	<a href="#">4323_ECHA Brief.pdf</a>	Please see response to comment # 3585
4324 2022/04/29	Individual, Hungary	The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).  There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.  The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.  We will fight against this ban and WILL NOT COMPLY.	Please see response to comment # 4153
4325 2022/04/29	Svensk Armaturindustri, Industry or trade association, Sweden	Today's use of lead and legislations Our members use only lead as an alloy element. It represents a tiny part of the 1 percent lead placed on the market annually (under miscellaneous). In Sweden, general guidelines on the use of lead were published in 1970 and a couple of years later, Statens Planverks tekniska byrå introduced type approvals on materials in contact with drinking water. In 1977, SBN established regulations for approvals of lead contents in taps (1977:2) and 1986, a variety of NKB4 tests were put in use to ensure that all products reaching the market meet specific requirements.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>

		<p>Since these first steps to control and limit the use of lead in copper alloys were taken, limit values have been lowered step by step resulting in gradually decreasing contents in materials and leached lead in drinking waters. Today, sanitary and building taps are covered by Directive 2020/2184 on the quality of water intended for human consumption, (a 2020 recast from the "old" Drinking Water Directive).</p> <p>Prevention of workers and consumer exposure  Worker's exposure is controlled through workers safety legislation which is under review. The Chemicals Agents Directive (CAD, currently under revision in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027) have set ambitious targets to further protect workers from risks at the workplace and with the objective to reach a Zero approach to work-related deaths in the EU. The Carcinogens and Mutagens Directive (CMD) has recently been amended and it includes limits for inorganic lead and its compounds as well as biological limit and health surveillance measures. It will reinforce the protection of workers from potential exposure to lead. Furthermore, the next draft Annex XIV amendment currently under preparation (<a href="https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en</a>) addresses seven lead compounds for which the Commission is still considering appropriate to postpone its decision due to the current review of the CAD. Additionally, in several member states, lower OEL (Occupational Exposure Limit) values and additional short-term exposure limits are established.</p> <p>Only 0.3 percent of all unflushed water samples in Sweden between 2017 and 2019 contained lead above the limit value, (Livsmedelsverket, Report on the quality of Sweden's drinking water 2017 - 2019). In more than 200 tests done in 2019, 94.6 percent showed median lead levels under 1 µg/l. Today, exposure to lead through drinking water represents only about 4 percent of the daily intake. Products in contact with drinking water made by copper alloys has a very long service life, at least 50 years. Most of these tests are done on old installations with lead contents that are not approved today, and they would certainly not pass the tests in the new European Drinking Water Directive. Lead, enclosed in brass, does not pose a health risk and coatings prevents exposure through contact. The weight percentage of lead does not mirror the amount of lead leached into the drinking water. It is a very complex phenomenon, affected by many different parameters were materials ability to form a non-water-soluble layer on its surface in its reaction with the water is crucial.</p> <p>Lead emissions from industrial uses in the EU have drastically decreased during the last decades. According to the International Lead Association (ILA), the European Pollutant Release and Transfer Register (E-PRTR) data indicates that emissions of lead to air reduced by 88 percent while emissions to water reduced by 80 percent between 2007-2020.</p>	<p><b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b>  <b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b>  <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p>
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		<p><b>Development of a new Drinking Water Directive</b> The new European Drinking Water Directive will develop comprehensive test methods even further and imply stricter requirements for leached substances into drinking waters, including lead. Materials with the highest contents of lead will not survive a reduction of the limit value from 10 µg/l to the proposed 5 µg/l by January 2036. Substitutions, whenever possible and economically feasible, is addressed in the revised directive under Article 10.3(f). ECHA is now involved in the process of setting positive lists of authorised substances for the manufacturing of materials in contact with drinking water. A review mechanism is foreseen, where each entry on the positive lists is assorted with an expiry date requiring companies who wish to maintain the use of a substance to send a review application by a set expiry date. The Committee for Risk Assessment (RAC) will review applications, allowing the Commission to decide if an entry should be kept, amended or removed from the lists. Our industry adheres strictly to these regulations to ensure the protection of its workers, consumers and the environment. In Sweden, KIWA and RISE regularly conduct product and production audits to ensure that the industry's commitment stays firm.</p> <p><b>Sustainability, climate footprint and the circular economy</b> The climate threat cannot be ignored by anyone. Manufacturing brass from virgin raw materials creates an 8.4 times larger climate footprint compared recycling, which is a climate saving of about 3.5 kg CO<sub>2</sub>eq/kg, (calculation done by T. Rydberg, IVL Svenska Miljöinstitutet, 2021. See also Informationsblatt CO<sub>2</sub>-Faktoren, Bundesförderung für Energie- und Ressourceneffizienz in der Wirtschaft - Zuschuss). The difference can be both smaller, and significantly bigger depending on transports, the source of materials and the energy used in the process. In today's Swedish brass production, we use about 90 percent recycled materials. With a rapid transition to lead free alloys (under 0,1 weight percent) more than 90 percent of all material coming in for recycling today would be discarded, generating a use of virgin raw materials of around 90 percent, (information from Nordic Brass, Gusum).</p> <p>Today, there is no commercial method to purify brass from lead. Therefore, it is necessary to maintain a high recycling rate to meet our requirements on sustainability. It is in line with (among other initiatives) the The European Green Deal and the EU Waste Framework Directive, which obliges member states to take the necessary measures to ensure that waste undergoes a recycling procedure and to avoid discarding products and materials. The future SPI would be penalizing EU manufacturers when they no longer can use recycled material. The problems of how to handle both leached lead in drinking waters and the climate change are not isolated challenges, which can be handed over to, and expected to be resolved by, the industry alone. Global warming is an existential threat, making it a responsibility also for ECHA and everyone working on the new Drinking Water Directive. An open and respectful discussion between all involved parties is the only way to secure a successful transition.</p>	<p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b> <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b> <b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b> <b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b> <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b> <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b> <b>B.2.01. Request extra long LAD</b> <b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b> <b>B.2.03 Joined AfAs result in shorter review periods</b> <b>B.2.04 Require longer time between LAD and</b></p>
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		We believe all these factors combined should be considered and postponing the recommendation for lead based on ongoing regulatory processes is justified. <a href="#">4325_SAI Lead on the REACH authorisation list (Annex XIV)_2022-04-29.pdf</a>	<b>SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4326 2022/04/29	Individual, France	<a href="#">4326_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4327 2022/04/30	Individual, Germany	Blei sollte man nicht verbieten... es gibt weitaus schlimmeres für die Umwelt!!!!	Thank you for your opinion.
4328 2022/04/30	Individual, Germany	If lead will be classified regarding Annex XIV it will have massive consequences for sport shooting, because there is absolute no adequate alternative for lead ammunition. Especially for black powder weapons. Every other metal will damage the barrel and will cause dangerous inaccuracies. Further it will destroy a UNESCO protected and traditional sport and millions of sport shooters will lose their hobby.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4330 2022/04/30	Individual, Belgium	<a href="#">4330 CONTRIBUTION TO THE PROPOSAL MADE BY ECHA TO INCLUDE LEAD IN ANNEX XIV - By Atelier Versicolore.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>



			<p><b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b>  <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b>  <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b>  <b>C.1.1. General principles for exemptions under Art. 58(2)</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b>  <b>C.2.08 Exempt use in art and building sector</b></p>
<p>4332 2022/04/30</p>	<p>Individual, Germany</p>	<p>According to Article 55 of REACH it is a general demand that the availability of alternatives must be analysed with respect to their potential risk, if such alternatives exist, and take into account the technical and economic feasibility of the potential substitute. Following this analytical guidelines is the only way to prevent potential economic and financial damage to all parties that</p>	<p>Please see response to comment #</p>

		would be affected by a total ban, such as individuals (users), manufacturers and dealers, as well as the related employees of these industries. <a href="#">4332_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	4287
4333 2022/04/30	Individual, Belgium	<a href="#">4333_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4334 2022/04/30	Individual, Germany	Lead shall not be added to the list of SVHC in Annex XIV of REACH for ammunition (hunting and sports shooting) there are no adequate alternatives.  As a general comment the whole process of participation is far too complex to grasp for a normal EU citizen. It is hence exclusive to EU citizens who are either familiar with REACH or have the ability to understand legal writings. This process excludes the vast majority of EU citizens and is hence not democratic at all. Only a simplified process of comments would allow a democratic participation.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.2.34 Process of commenting not democratic, as too complex</b>
4335 2022/04/30	Individual, Belgium	<a href="#">4335_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4336 2022/04/30	Individual, Italy	Buongiorno Spettabile ECHA io credo che questi aspetti di seguito riportati siano stati trascurati totalmente: Non esiste un'alternativa migliore al piombo nelle munizioni Per molti casi d'uso come il tiro sportivo non c'è alcuna alternativa (munizioni a percussione anulare e pallini per pistole ad aria compressa) Il rame - usato attualmente come alternativa senza piombo per i proiettili da caccia - è già nella "watchlist" dell'ECHA.  Inoltre il piombo in forma Metallica viene usato solo per il 4% del totale per le munizioni e non si conoscono effetti di saturnismo tra i cacciatori contrario di quello che si vuole far credere. , Anche il consumo di carne stimato pro capite lo trovò veramente sovrastimato. Credo purtroppo che questa proposta abbia una grande sproporzione tra rischi e benefici... benefici praticamente nulli ma al contrario una perdita economica molto rilevante che genererà malcontento tra i cittadini UE che inizieranno a vedere l'UE come qualcosa di ostile sviluppando purtroppo un sentimento anti UE. In quanto i divieti ingiustificati vengono percepiti non come necessari ma come una punizione del governo nei confronti di determinate categorie di cittadini. Quindi da europeista convinto quale sono, suggerisco di spostare l'attenzione verso i settori che veramente utilizzano notevoli quantità di piombo e lo disperdono nell'ambiente. Per esempio le fonderie	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>

		l'industria delle batterie al piombo e il settore della gestione dei rifiuti. Ultimo ma non in ordine di importanza, le nostre aziende sarebbero penalizzate e cederebbero quote di mercato ad industrie extra UE tra cui Russe e Cinesi e visto il periodo di guerra in Ucraina non mi sembra proprio il caso di concedere loro benefici economici. I miei più cordiali saluti Alessandro Roma	
4339 2022/04/30	atelier federica tarabini, Company, France	<a href="#">4339_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4340 2022/04/30	Individual, France	<a href="#">4340_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4341 2022/04/30	Individual, Germany	The data that draft recommendation is based on is not considering / deviating the different sources of lead and the environmental risks in detail. for example on lead ammunition there was a ban for lead shot in wetlands (mainly bird shot for shotguns), which is new in place and therefore this source is not relevant anymore. Lead for sport shooting in the EU is also not brought into the vast environment, but only into limited area of shooting ranges. Many countries have regulatories on how these shooting ranges are built and ensure lead is not released into the ground freely. The lead for hunting ammuntion for rifles (beside birdshot) is only a very small portion of the overall lead. It shall be kept in mind: There are several EU countries who stepped back from the lead ammuntion ban for hunting purpose, what has been decided because there are massive arguments againts.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b>
4343 2022/04/30	Individual, Belgium	<a href="#">4343 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4344 2022/04/30	Individual, Netherlands	lead is a element that can not replaced with a other metal.in industry and shooting sports.in airguns rimfire , black powder and in guns already made ,because of score results and pressure needed. to get the ballistics	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>

4345 2022/04/30	Individual, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	Please see response to comment # 4330
4347 2022/04/30	Individual, France	<p><a href="#">4347_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4348 2022/04/30	Hélène Vitali Atelier de vitrail, Company, France	<p>o If ever the lead had to be registered, the deadlines for the stained glass window are much too short</p> <p><a href="#">4348_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4349 2022/04/30	Individual, Belgium	<p><a href="#">4349 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4350 2022/04/30	Individual, France	<p><a href="#">4350 Fwd_CSNV - REACH - Plomb - consultation - Réponse et méthodologie.zip</a></p>	Please see response to comment # 3862
4352 2022/04/30	Individual, France	<p><a href="#">4352_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862

4353 2022/04/30	Individual, Germany	Bleihaltige Munition ist für Jäger und Sportschützen zum Training und Wettkampf ohne Alternative.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4354 2022/04/30	Corpus Vitrearum / ICOMOS, International organisation, Belgium	<a href="#">4354 ECHA Lead ICOMOS ICOM ECCO AlettaRambaut.pdf</a>	
4355 2022/04/30	Individual, Germany	Klares Nein zum Bleiverbot sowohl jagdlich aber gerade im sportlichen Bereich gibt es keine guten Alternativen.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4356 2022/04/30	Individual, Belgium	<a href="#">4356 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	
4357 2022/04/30	S.A.R.L Martin L.G., Company, France	<a href="#">4357 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3875
4358 2022/04/30	Glass-d-art, Company, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	Please see response to comment # 4330

4359 2022/04/30	Individual, France	<a href="#">4359_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4360 2022/04/30	Individual, Hungary	<p>"The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).</p> <p>There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.</p> <p>We will fight against this ban and WILL NOT COMPLY."</p>	Please see response to comment # 4153
4361 2022/04/30	atelier Vitro de Carol Frasson Spingardi, Company, France	<a href="#">4361_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4362 2022/04/30	Individual, France	<a href="#">4362_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4363 2022/04/30	Individual, Belgium	<a href="#">4363_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4364 2022/04/30	Corpus Vitrearum, International organisation, United Kingdom	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4365 2022/04/30	Individual, France	<a href="#">4365_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment #

			3862
4366 2022/04/30	Individual, France	<a href="#">4366_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4367 2022/04/30	Individual, Hungary	<p>Dear Sir/Madam,</p> <p>The planned lead ban is a direct political attack against the many millions of European gun owners. You will find an air gun in practically every second(!) household in Europe.</p> <p>There is no alternative for lead-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to zero. The social and economical impact is totally unproportional.</p> <p>The purpose of this ban is to de facto ban civilian gun ownership in the EU, on the grounds of the popular topic of environmental protection.</p> <p>You all are abusing the followings:</p> <ol style="list-style-type: none"> <li>1. most EU citizens do not even know about this draft;</li> <li>2. most EU citizens cannot even comment on this issue with professional arguments;</li> <li>3. today, environmental protection is a popular topic that can be used to gain the support of the masses of non-expert citizens for anything.</li> </ol> <p>I will fight against this ban and will never comply.</p> <p>Best regards, Péter Porkoláb</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.34 Process of commenting not democratic, as too complex</b></p>
4368 2022/04/30	Individual, France	<p>If ever the lead had to be registered, the deadlines for the stained glass window are much too short</p> <p><a href="#">4368_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4369 2022/04/30	Individual, Luxembourg	<p>If ever the lead had to be registered, the deadlines for the stained glass window are much too short</p> <p><a href="#">4369_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais1.pdf</a></p>	Please see response to comment # 3862

4370 2022/04/30	Individual, Luxembourg	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	Please see response to comment # 3862
		<a href="#">4370_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais1.pdf</a>	
4371 2022/04/30	Northrop Grumman LITEF GmbH, Company, Germany	<a href="#">4371_ECHA_Lead-Restriction_Response_Northrop-Grumman-LITEF-GmbH.pdf</a>	<b>A.1.1.5. New information and next steps towards the final recommendation</b> <b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b>



			<p><b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b> <b>A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete</b> <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b> <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b> <b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b> <b>A.2.36 Attached COM questionnaire</b> <b>B.2.01. Request extra long LAD</b> <b>B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b></p>
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			<b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4373 2022/04/30	Individual, Belgium	<a href="#">4373_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4374 2022/04/30	Individual, Belgium	<a href="#">4374_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4375 2022/04/30	Individual, Germany	Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern <a href="#">4375_Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern S.2.pdf</a>	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4376 2022/04/30	Individual, France	<a href="#">4376_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4377 2022/04/30	Atypique Création, Company, France	<a href="#">4377_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4378 2022/04/30	KunstRegie B.V., Company, Netherlands	requesting a exemption from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby pose a threat to our future. stained glass heritage. [REACH Annex XIV, EC number 231-100-4]. <a href="#">4378_ECHA Ontheffing Lood verwerking KunstRegie 30-04-2022.pdf</a>	Please see response to comment # 3585
4379	Individual,		

2022/04/30	France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4380 2022/04/30	lycée lucas de Nehou, Academic institution, France	<a href="#">4380_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4381 2022/04/30	Individual, Germany	Warum wird so was gemacht, was für eine Sinn soll das haben? Ganze Berufszweige sind davon betroffen, geschweige von Jägern und Sportschützen. Das ist doch politisch gewollt, ich kann mir sons nichts anderes vorstellen.	Please see response to comment # 4153
4382 2022/04/30	Individual, Germany	Please consider alternative solutions before banning. Risks of substitute solutions need to be analyzed and considered. Bans witout alternatives are a dead-end-road	Please see response to comment # 4287
4383 2022/04/30	Individual, France	<a href="#">4383_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4384 2022/04/30	Individual, Belgium	<ol style="list-style-type: none"> <li>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</li> <li>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</li> <li>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</li> <li>4. There in no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</li> </ol> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	Please see response to comment # 4330

		<a href="http://www.atelier-versicolore.be/wp-content/uploads/2022/04/CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf">http://www.atelier-versicolore.be/wp-content/uploads/2022/04/CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	
4385 2022/04/30	Bund Deutscher Klavierbauer e.V. (BDK), Other contributor, Germany	<a href="#">4385_Fragenkatalog_Musikinstr_gesamt_BDMH_De-En.zip</a> <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.36 Attached COM questionnaire</b>
4386 2022/04/30	Individual, France	<a href="#">4386_2022.04.25. - CNSV - Response consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4387 2022/04/30	ASSOCIAZIONE ITALIANA ORGANARI (ITALIAN ASSOCIATION OF ORGANBUILDERS), Industry or trade association, Italy	Lead is used to make the metal sheets alloy (made of lead and tin) that is needed to make organ pipes. The percentage of lead used in the alloys varies from 5% to 85%. The lead quantity used in the Organbuilding industry is a very small amount (0.004%) of the total consumption of lead in Europe. The organ pipes that contain lead are not accessible to the general public, thus causing no harm.  <a href="#">4387_AIO Additional info.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>

			<b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4388 2022/04/30	Individual, Germany	<a href="#">4388_Zulassungspflicht für Blei_30-04-22.pdf</a>	Please see response to comment # 3833
4389 2022/04/30	Individual, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4390 2022/04/30	Germany, Member State	<a href="#">4390_Brief Museum Eisfeld Bleiglasfenster vom 30.04.2022.pdf</a>	Please see response to comment # 3585
4392 2022/04/30	Individual, France	<a href="#">4392_2022.04.25. - CNSV - R ®ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4393 2022/04/30	Individual, France	<a href="#">4393_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4394 2022/04/30	Individual, France	<a href="#">4394_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4396 2022/04/30	Individual, France	<a href="#">4396_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862

4397 2022/04/30	Individual, Belgium	<a href="#">4397 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4398 2022/04/30	Individual, France	If ever the lead had to be registered (which I hope not), the deadlines for the stained glass window are much too short <a href="#">4398 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4399 2022/04/30	Individual, France	<a href="#">4399 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4400 2022/04/30	Individual, Hungary	<p>"Dear Sir/Madam,</p> <p>The planned lead ban is a direct political attack against the many millions of European gun owners. You will find an air gun in practically every second(!) household in Europe.</p> <p>There is no alternative for lead-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to zero. The social and economical impact is totally unproportional.</p> <p>The purpose of this ban is to de facto ban civilian gun ownership in the EU, on the grounds of the popular topic of environmental protection.</p> <p>You all are abusing the followings:</p> <ol style="list-style-type: none"> <li>1. most EU citizens do not even know about this draft;</li> <li>2. most EU citizens cannot even comment on this issue with professional arguments;</li> <li>3. today, environmental protection is a popular topic that can be used to gain the support of the masses of non-expert citizens for anything.</li> </ol> <p>I will fight against this ban and will never comply.</p> <p>Sincerely, Kristóf Böde</p>	Please see response to comment # 4153

4401 2022/04/30	Individual, France	<a href="#">4401_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4402 2022/04/30	Individual, Germany	<i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b>
4403 2022/04/30	Individual, Germany	<a href="#">4403 MJ Einspruch Bleiverbot ECHA.pdf</a>	Please see response to comment # 4402
4404 2022/04/30	SARL Atelier de Vitrail St Joseph, Company, France	<a href="#">4404_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4405 2022/04/30	Individual, Hungary	Dear Sir/Madam,	

		<p>The planned lead ban is a direct political attack against the many millions of European gun owners. You will find an air gun in practically every second(!) household in Europe.</p> <p>There is no alternative for lead-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to zero (excepted wetlands). The social and economical impact is totally unproportional.</p> <p>The purpose of this ban is to de facto ban civilian gun ownership in the EU, on the grounds of the popular topic of environmental protection.</p> <p>You all are abusing the followings:  1. most EU citizens do not even know about this draft;  2. most EU citizens cannot even comment on this issue with professional arguments;  3. today, environmental protection is a popular topic that can be used to gain the support of the masses of non-expert citizens for anything.</p> <p>I will fight against this ban and will never comply.</p> <p>Best regards, Zsolt Darányi</p>	Please see response to comment # 4153
4406 2022/04/30	Verrerie de Saint Just, Company, France	<a href="#">4406_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4408 2022/04/30	Individual, Germany	<p>Schrotkugeln aus Stahl, Zink und Zinn sind Materialien mit geringer Dichte und geringem Gewicht und könnten das Niederwild nicht in ausreichender Menge durchdringen, um einen schnellen Abschuss zu erzielen.</p> <p>Schrotkugeln aus Stahl dürfen auf den meisten Schießständen und in den meisten Schrotflinten nicht genutzt werden. Stahlschrot gibt es z.Z. aus technischen Gründen nur mit Plastikhülsen. Allein in UK würde die Alternative zu Stahlschrot 500 Tonnen Plastikhülsen erzeugen.</p> <p>Stahlschrot tötet nicht so tierschutzgerecht wie Blei. In Norwegen wurden Gänse gefunden, in denen 4-6 Stahlschrote im Gewebe steckte. 4-6 Bleischrote hätten wirkungsvoll getötet, mit Stahlschrot wurden die Tiere „nur verletzt“. Es ist davon auszugehen, dass die Zahl der „nur“ verletzten Vögel um 50-75% nach dem Bleiverbot gestiegen ist.</p> <p>In Norwegen wurde das komplette Bleiverbot – mit Ausnahme in Feuchtgebieten – wieder aufgehoben: Tungsten/Wolfram war technisch der beste und teuerste Ersatz. Kann aber Krebs verursachen, weshalb diese 2014 in Dänemark verboten wurden.</p>	Please see response to comment # 4287



		<a href="https://www.shootinguk.co.uk/news/danes-to-ban-tungsten-250-Bismut/Wismut_koennte_bei_der_Jagd_bei_kalten_Temperaturen_platzen_und_ist_kaum_in_reinem_Zustand_zubekommen">https://www.shootinguk.co.uk/news/danes-to-ban-tungsten-250 Bismut/Wismut könnte bei der Jagd bei kalten Temperaturen platzen und ist kaum in reinem Zustand zubekommen</a>	
		<a href="#">4408_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	
4409 2022/04/30	Individual, France	<a href="#">4409_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4410 2022/04/30	Jégou Vitraux, Company, France	Because of its unique properties, lead is irreplaceable for my stained glass workshop and the risks associated with its use have been gradually controlled by constantly adapting the manufacturing process (wearing protective equipment and constraints related to the limit values of exposure).	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4411 2022/04/30	Individual, Germany	Bleiverbot für Sportschützen: Es ist mir unverständlich, weshalb das Bleiverbot auch für Sportschießstände mit Kugelfang gelten soll. Hier kann kein Blei in die Natur abgegeben werden. Ein Bleiverbot würde das Sportschießen über die Maßen beeinträchtigen, denn die Präzision der Munition leidet bzw. es ist technisch nahezu unmöglich einen finanziell erschwinglichen Ersatzstoff zu finden. Faktisch würden Sportschützen enteignet, ohne dass hierdurch ein Nutzen für die Natur erkennbar würde.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4412 2022/04/30	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4413 2022/04/30	SARL Atelier Anne Pinto, Company, France	<a href="#">4413_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4414 2022/04/30	International Society of Organbuilders, International organisation, Belgium	Lead can be found in pipe organbuilding in the manufacturing of metal organ pipes and to a lesser degree in wind conductors. In organ pipes, it appears as an alloy mixed with mainly tin. It is therefore restricted to discrete items that are manufactured by skilled craftspeople who follow strict health guidelines. Soldering is done with a eutectic alloy at low temperature. The organ pipes are then placed in the instrument away from the end users. The fact that the lead is held in discrete items makes its recycling easy and cost efficient. The quantity used by the trade each year is minimal (less than 50 tons in EU)	Please see response to comment # 3925

		<a href="#">4414_ISO- ECHA Lead ban statement.pdf</a>	
4415 2022/04/30	Individual, France	<a href="#">4415_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4416 2022/04/30	Individual, France	<a href="#">4416_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4417 2022/04/30	Individual, Germany	The EU wide ban of lead as bullet material, for target shooting is not acceptable for Germany, hence the shooting ranges in Germany are equipped with bullet traps, that avert lead contamination of the natural environment. This is valid for outdoor and indoor shooting ranges. In addition, the lead contamination of participants using indoor ranges is prevented by corresponding air extraction systems.	Please see response to comment # 4086
4419 2022/04/30	Individual, France	<a href="#">4419_20220425 - CNSV - Réponse consultation ECHA - C_220430_171910.pdf</a>	Please see response to comment # 3862
4420 2022/04/30	Individual, Belgium	<a href="#">4420_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4421 2022/04/30	Individual, Belgium	<a href="#">4421_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4423 2022/04/30	Individual, Belgium	<a href="#">4423_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4424	Individual,		

2022/04/30	Belgium	<a href="#">4424_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4425 2022/04/30	Individual, Hungary	<p>The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!).</p> <p>There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to ZERO. The social and economical impact is totally unproportional.</p> <p>We will fight against this ban and WILL NOT COMPLY.</p>	Please see response to comment # 4153
4426 2022/04/30	International Council on Monuments and Sites Wood Committee (IIRC), International NGO, France	<p>See attached letter</p> <p><a href="#">4426_20220428_ECHA_Lead_ICOMOS_Wood_Committee_FINAL_EN.pdf</a></p>	Please see response to comment # 3875
4427 2022/04/30	Individual, Belgium	<a href="#">4427_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4428 2022/04/30	Atelier Berthelot, Company, France	<a href="#">4428_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4429 2022/04/30	Spalding Gentlemen's Society, Other contributor, United Kingdom	<a href="#">4429_letter_SGS - Lead 30.04.22.docx</a>	Please see response to comment # 3585
4430 2022/04/30	Individual, Belgium	<a href="#">4430_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330

4431 2022/04/30	Les Aventures Verrières, Company, France	<a href="#">4431_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4432 2022/04/30	Individual, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p> <p><a href="#">4432 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4433 2022/04/30	Atelier de l'Harmonium, Company, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4434 2022/04/30	Individual, Belgium	<p>Uses exempted from the authorisation requirement - Comments on uses (or categories of uses) that should be exempted, including reasons for that :</p> <p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too</p>	Please see response to comment # 4330

		small for suppliers to take an interest in them.	
		<a href="#">4434 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	
4435 2022/04/30	Individual, Germany	Als Jäger und Sportschütze bin ich auf die Verwendung bleihaltiger Munition angewiesen. Meine Waffen sind für bleifreie Munition nicht ausgelegt und wären nicht mehr zu gebrauchen. Neuanschaffungen kann ich mir als Rentner nicht leisten. Außerdem wäre ein totales Bleiverbot völlig unangemessen und eine reine Schikane gegen staatstragende Bürger in der gesamte EU. Es käme einer kalten Enteignung der vorhandenen Jagd-und Sportwaffen gleich.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4436 2022/04/30	Individual, Netherlands	Whatever is decided, ownership and transfer of existing lead based ammunition should remain possible for historical and technical research and collecting by institutions and private researchers and collectors.	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>
4437 2022/04/30	Individual, Belgium	<a href="#">4437 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4438 2022/04/30	Individual, Belgium	<a href="#">4438 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4439 2022/04/30	Individual, Belgium	<a href="#">4439 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4440 2022/04/30	Individual, Belgium	<i>Confidential attachment removed</i>	Please see response to comment # 4330
4441	Individual,		

2022/04/30	Belgium	<a href="#">4441 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4442 2022/04/30	Individual, Belgium	<a href="#">4442 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4443 2022/04/30	Individual, Belgium	<a href="#">4443 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4444 2022/04/30	Individual, United Kingdom	Lead has been used for thousands of years to make various forms of art, It's use in stained glass is paramount, there is no other metal substance that can replicate its use. The idea there is to be permits for its use is ridiculous, and any idea of this must be stoped. It's use must continue uninterrupted.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4445 2022/04/30	Brussels artistic stained glass, Company, Belgium	I'm in the end of my carreer but i'm carring to be a future for this fantastic art. In Belgium and in France too, we have o lot of houses they have stained glass. Please do not kill that. The culturr is so important for the humanity. Thanks a lot	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4446 2022/04/30	Individual, Hungary	The planned LEAD ban is a direct political attack against the many millions of European gun owners (you'll find an air rifle in practically every second household in Europe!). There is NO alternative for LEAD-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. Period. The overall effect of the metallic lead bullets on the enviroment is negligible, close to ZERO. The social and economical impact is totally unproportional. We will fight against this ban and WILL NOT COMPLY.	Please see response to comment # 4153
4447 2022/04/30	Individual, Belgium	Uses exempted from the authorisation requirement - Comments on uses (or categories of uses) that should be exempted, including reasons for that :	

		<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	Please see response to comment # 4330
4450 2022/04/30	Individual, France	<a href="#">4450_2022.04.25. - CNSV - Comment soumettre sa contribution.docx</a>	Please see response to comment # 3862
4451 2022/04/30	Individual, France	<a href="#">4451_2022.04.25. - CNSV - Comment soumettre sa contribution.docx</a>	Please see response to comment # 3862
4453 2022/04/30	Individual, France	<a href="#">4453_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
4454 2022/04/30	ACM, Other contributor, France	<a href="#">4454_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4456 2022/04/30	Individual, Hungary	The proposal de-facto bans lead projectiles for sport, and recreational shooters. There are NO feasible alternatives to lead for air guns, muzzle loader historical firearms, an smallbore (.22) sport arms. For other sports applications, alternatives are available, but are economically devastating to the entire eco-system of impacted EU citizens, manufacturers, clubs , and sport	Please see response to comment #

		<p>associations.</p> <p>The environmental impact of lead projectiles is negligible. A meaningful portion of projectiles is already recycled. The social, and economical impact of de-facto banning entire fields of sports, and hobbies is unacceptably disproportionate to the perceived environmental impact.</p> <p>In case the regulator body does genuinely want to decrease the negative impact of lead projectiles, (and not only make the existence of legitimate sports nearly impossible, and indirectly ban all sports guns) I suggest considering other measures. E.g. establishing lead collection targets (similarly to WEEE, and battery directives) , or expecting from manufacturers a gradually increasing % of recycled vs virgin material content in lead projectiles -there are multiple solutions, each of which offers more sensible alternatives to an outright ban, that will never work.</p>	4411
4457 2022/04/30	Individual, Belgium	<p><a href="#">4457 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4458 2022/04/30	Individual, France	<p><a href="#">4458 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4459 2022/04/30	Individual, France	<p><a href="#">4459 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4460 2022/04/30	Individual, France	<p><a href="#">4460 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4461 2022/04/30	Individual, France	<p><a href="#">4461 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4463	Individual,		



2022/04/30	France	<a href="#">4463_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4464 2022/04/30	Individual, France	<a href="#">4464_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4465 2022/04/30	Individual, France	<a href="#">4465_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4466 2022/04/30	Le Verre de Voûte, Company, France	<a href="#">4466_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4467 2022/04/30	Individual, France	<a href="#">4467_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4468 2022/04/30	Individual, France	<a href="#">4468_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4469 2022/05/01	Individual, Belgium	<a href="https://atelier-versicolore.us20.list-manage.com/track/click?u=1cf506078689509d9bb4757ef&amp;id=b633550c3a&amp;e=f482e4a05b">https://atelier-versicolore.us20.list-manage.com/track/click?u=1cf506078689509d9bb4757ef&amp;id=b633550c3a&amp;e=f482e4a05b</a>	Please see response to comment # 4330
4470 2022/05/01	Individual, Belgium	<a href="#">4470 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4471	Atelier La Danse du Feu,		

2022/05/01	Company, France	<a href="#">4471_lead-attachment.zip</a>	Please see response to comment # 3862
4472 2022/05/01	Atelier Berthier , Company, France	<a href="#">4472_plomb.docx</a>	Please see response to comment # 3862
4473 2022/05/01	Glasgow Museums, Regional or local authority, United Kingdom	<p>TO: The European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finland</p> <p>Dear Colleagues,</p> <p>Appeal for Derogation in Respect of proposed EU Regulations on the Use of Lead which would prevent stained glass artists and stained glass conservators from practicing their profession and thereby pose a threat to the future of our Stained Glass Patrimony [REACH Annex XIV, EC Number 231-100-4]</p> <p>Lead, cast, milled or extruded into lead comes or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), Brussels and Antwerp cathedrals (Belgium), Canterbury Cathedral and York Minster (United Kingdom), Leon and Girona Cathedrals (Spain), the National Cathedral, Washington DC (USA), and is among the greatest treasures of museums including the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow) to name but a few. While leaded stained glass grew to cultural prominence in medieval Europe and enjoyed a massive revival in the nineteenth century, it is now practiced all over the world and has attracted modern artists of the international stature of Marc Chagall, Georges Braque, John Piper, Johannes Schreier, Georg Meistermann, Brian Clarke and Narcissus Quagliata.</p> <p>Its malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the</p>	Please see response to comment # 3585

		<p>historic windows of our heritage sites and museums could not be repaired, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form.</p> <p>The toxicity of lead is well-understood and its risks to health are effectively managed by stained glass designers, fabricators and conservators all over the World. Regular blood testing, use of extraction and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk.</p> <p>We strongly urge the European Commission to exclude the use of lead in the fabrication and conservation of stained glass from its proposed ban. Not only would this ban wipe out the livelihoods of artists in glass, craftspeople involved in fabrication and conservators involved in the care of heritage assets in Europe, but its effects would be felt throughout the world, sealing the eventual death sentence of one of the most glorious art forms known to mankind.</p> <p>With best wishes,</p> <p>David Thomson</p> <p>Senior Conservator Glasgow Museums</p>	
4474 2022/05/01	Individual, Netherlands	<a href="#">4474_Brief voor ECHA.pdf</a>	Please see response to comment # 3585
4475 2022/05/01	Individual, New Caledonia	<a href="#">4475_Copie de 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4476 2022/05/01	Individual, France	<a href="#">4476_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4477 2022/05/01	Individual, France	<a href="#">4477_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4479 2022/05/01	Stichting Glaslab Den Bosch, Academic institution, Poland	<p>ontheffing van de voorgestelde EU-verordening inzake het gebruik van lood, die glas-in-loodkunstenaars en conservators/restaurators in het vakgebied zou verhinderen hun beroep uit te oefenen en daardoor een bedreiging zou vormen voor de toekomst van ons glas-in-looderfgoed. [REACH Bijlage XIV, EG-nummer 231-100-4].</p> <p><a href="#">4479_ECHA lood uitzondering loodverwerking Glaslab Den Bosch 30-04-2022 pc.pdf</a></p>	Please see response to comment # 3585
4480 2022/05/01	International Council for Game and Wildlife Conservation, International NGO, Austria	<p>Specific issues listed below (points 1-10), with comments below each:</p> <p>1. Hunting Reference should be made to "rimfire calibres" and not to rim calibres as it is written currently. Currently available lead-free ammunition for example for calibers .17 HMR or .22 LR does not offer sufficient and sustained precision when fired, nor is its performance satisfactory to the best of our knowledge.</p> <p>From an ethical point of view, one which we strongly believe is needed, it must be ensured that any lead-free ammunition that is mentioned has a sufficient or adequate killing effect which matches that of lead ammunition used for hunting.</p> <p>2. Alternatives to lead for certain types of hunting In principle, lead-free ammunition used for hunting must match or better conventional or "innovative" lead ammunition with respect to precision, safety (e.g. hazard areas and ricochet behavior), and immediate killing effect. We therefore advocate a projectile type test or test of the killing effect (both for bullet and shot ammunition) of the respective hunting ammunitions.</p> <p>There are well-researched scientific and practical findings on this subject for the activity of hunting, which are readily available.</p> <p>3. Distinction between large and small calibres We refer to our explanations as under point 2. namely that in principle, lead-free ammunition used for hunting must match or better conventional or "innovative" lead ammunition with respect to precision, safety (e.g. hazard areas and ricochet behavior), and immediate killing effect. In addition, there is the requirement of a guaranteed system compatibility between weapon and ammunition (length of twist, gas pressure, weapon wear and/or load capacity and safety for the shooter, etc.). We therefore advocate a projectile type test or test of the killing effect (both for bullet and shot ammunition) of the respective hunting ammunitions.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.2.35 Comment on Annex XV restriction dossier</b></p>

		<p>We therefore generally do not advocate a fundamental material debate with regard to hunting ammunition, but rather for test criteria (objective and verifiable criteria) that hunting ammunition must meet regardless of the material it is made of. Absolutely convincing evidence that alternative types of ammunition made from lead-free materials "always" function equally or better than conventional and innovative lead ammunition does not exist, as is often claimed. This to the best of our knowledge and that of the Technical University of Munich. This is why test procedures are all the more important.</p> <p>4. Sports shooting          We will use the example of a country that we are both familiar with, and which already has high standards in place. In the Federal Republic of Germany this is already legislation in place which sets limits on lead concentration in soil used for agricultural purposes. There is a federal law to protect against harmful environmental effects from air pollution, noise, vibrations and similar processes (BImSchG).</p> <p>DIN 19740 (Part 1 and Part 2) is also a reference point on this issue. This sets out rules which describe very clearly, and factually, all environmentally relevant requirements for all different types of shooting ranges.</p> <p>5. Measures to limit releases to the environment at trap and/or skeet ranges          As mentioned already under point 4 above, such measures are already in place in the Federal Republic of Germany. If shooting ranges that currently shoot with lead in a secure environment (in agreement with the relevant authorities) are required by law to convert to steel shot at EU-wide level basis, many shooting ranges that are important for hunting will lose their approval status. Based on our knowledge, it is therefore neither necessary nor proportionate to switch to lead-free ammunition in each individual case if the shooting range is already operating with lead under conditions that are deemed by relevant authorities to be secure. There are already very high standards for this in Germany.</p> <p>Relevant ecotoxicological interactions (chemical reactions) are to be expected if alternative metals to lead are to be used on shooting ranges (shot), for hunting or for sports in the future. Measures to restrict the use of lead ammunition in such instances are unnecessary if, for example, lead would anyways not be mobilised in the environment due to the nature of the soil and the subsoil, and therefore no environmentally relevant pollution can occur. Lead in the environment is regularly and professionally monitored in Germany via control points, such as regular groundwater samples (permanently installed measuring stations).</p> <p>6. Measures to limit releases to the environment at outdoor rifle/pistol ranges          As described in points 4 and 5, we already have numerous sound legal regulations and findings in Germany on releases to the environment. With regards to shooting ranges, the following is</p>	
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very important to consider: The use of lead-free projectiles at shooting ranges has an impact on the set up of safety structures on shooting ranges (e.g. height protection via high blinds, structure of the bullet-proof roofs). Compliance requirements are set for protection from ricochets and the prevention of so-called bullet holes. In order to meet the safety-relevant requirements, the issue of ricochets or deflected lead-free rifle bullets is an essential aspect to consider in order to ensure safety at shooting ranges. This applies in particular to the receipt of insurance cover.

7. Measures to limit exposure of shooters

Firstly, shooting outdoors must be differentiated from shooting indoors. When hunters practice shooting outdoors in the open, they do not have concerns about lead retention in the blood of the shooters. We are not aware of any scientifically reliable or substantiated data, which are based on evidence, and that demonstrate or confirm elevated lead blood levels among hunters. In addition, we know from blood analyses of hunters that shoot intensively, that there are no abnormal lead blood level values.

Secondly, emphasis should be drawn to shooting indoors. Germany also has high standards, including stringent technical requirements that have to be guaranteed when operating the shooting ranges with modern ventilation systems.

8. Remediation of shooting ranges/areas

The refurbishment of shooting ranges is a very delicate topic that has to be considered in its entirety. Many shooting ranges are run by non-profit associations and there cannot be excessive costs required from them which are disproportionate. As already mentioned, shooting ranges in Germany are regulated by the authorities and require approval to operate. From our point of view, further restrictions are therefore not necessary, as great importance is already attached to all essential aspects of health protection and the emission of substances such as lead.

Compliance with even more stringent conditions will be especially difficult for shooting range operators, which would mean a wave of shooting range closures. As a result, hunters may no longer be able to practice shooting close to where they live. This creates additional costs that are unnecessary. We therefore recommend to consult the national regulations in Germany regarding the officially approved shooting range operations. We are happy to assist with this if requested.

9. Substitution of lead ammunition in outdoor sports shooting

It is important to differentiate between shooting as part of hunting and "sport shooting". We urge an objective and balanced view on the topic, meaning lead only needs to be replaced if there are adequate alternatives available which, based on review criteria, are also comparable and proportionate to existing lead ammunition. Innovative solutions should be sought rather than strict material bans. As long as metals (e.g. copper and zinc) are fired, there can always be criticism with surrounding one or other criterion with regard to toxicological and ecotoxicological issues.

10. Impacts of the proposed restriction  
 Regardless of the intended restriction of lead by the European Commission, it should be noted that lead has many advantages over alternative materials. Impacts from the planned restriction of lead in shotgun and rifle ammunition extend far beyond toxic effects on the environment, flora, and fauna including humans. Impacts of lead must be assessed more broadly. We therefore advocate for a well-founded, practical, and knowledge-based decision which, in our opinion, cannot yet be made at this point in time.

A real-life example of the wider effects: Alternatives to lead such as copper and zinc have a high very toxic effect on water fleas. Based on the results from the most recent research (see e.g. studies by Prof. Axel Göttlein TUM), lead as an ammunition material cannot be simply be described as positive or negative. If one compares, for example, lead with copper or zinc in their effect on Daphnia magna, as described in the work "Leaching behaviour and ecotoxicological effects of different game shot materials in freshwater. Knowledge and Management of Aquatic Ecosystems", it was found that the solutions contaminated with lead did not lead to a significant mortality rate. In contrast, it was found that the zinc and copper ions released were very toxic for Daphnia magna and the mortality rates were significantly high.

Criteria for hunting ammunition  
 It should be noted at this point that hunting is extensively regulated by law throughout the European Union and at the level of National States. Social, political, ecological and, last but not least, economic aspects are connected with these regulations, which in turn are of very high and great importance for the coexistence of people and their national cultures. Therefore, from our point of view, it is essential to be certain and ensure that any unnecessary ban on the use of lead must not and cannot lead to a general deterioration in any of these aspects. The basics of hunting must be guaranteed. In addition to environmental compatibility, hunting ammunition must meet other important criteria in order to be used in practice for hunting:

- Practical safety for hunting:
  - o low risk of ricochets (safety for shooters and others users of the environment, as well as the environment itself)
  - o System compatibility (weapons and ammunition)
  - o Test procedures as part of product safety: simulation shots, e.g. B. Check the energy output at different distances (see DIN SPEC 91384 in the area of rifle ammunition)
  
- Practical hunting suitability:
  - o Effective killing effect
  - o Sufficient penetration
  - o Bullet exit and bleeding

		<ul style="list-style-type: none"> <li>o Little damage to game meat</li> <li>• Ensuring game hygiene:             <ul style="list-style-type: none"> <li>o No (or harmless) contamination of the game meat (meat suitable for consumption)</li> </ul> </li> <li>• Ecological harmlessness:             <ul style="list-style-type: none"> <li>o Safe ecotoxicological properties</li> <li>o Environmental friendliness</li> </ul> </li> <li>• Economic feasibility:             <ul style="list-style-type: none"> <li>o Value for money</li> <li>o Ammunition availability</li> </ul> </li> <li>• Guarantee of legal conformity:             <ul style="list-style-type: none"> <li>o Compliance with legal framework conditions (e.g. WaffG, BeschG, Commission Internationale Permanente pour l'Épreuve des Armes à Feu Portatives (C.I.P.))</li> <li>o International Conventions and Agreements similar to the "African-Eurasia Waterbird Agreement"</li> </ul> </li> </ul> <p>For us there is no question that toxic substances such as lead should be reduced to the best possible levels in the environment and other pathways. The ECHA report is mainly concerned with the effects of lead on birds and humans. Unfortunately, there are still no satisfactory answers to many questions.</p> <p>From our point of view, a bullet type test is required in which bullets (bullets as well as shot) with the different metal components can be tested for their killing effect. In addition, further test procedures are to be developed which can investigate the ecotoxicological effects of different alloys and material compositions (Prof. Göttlein has already worked out the basic requirements for this). Based on the opinion of recognized experts, "innovative bullets" are also conceivable in the future, which allow a percentage of lead. The fact that it is not possible to dispense with lead as a material shows that even with modern, homogeneous solid brass bullets, the lead content is up to 3.5 per cent for processing reasons. The development of modern storey types that meet the different standards therefore still remains a task to be worked out.</p> <p>Our demands</p> <p>In our opinion, focusing purely on restrictions on lead as ammunition material is not expedient for several reasons. Of course, we support the idea of safety, which is behind the idea of minimizing lead use. That said, we remain convinced that the solution to all identified problems does not involve a general ban on lead. This approach falls far short of the mark and does not</p>	
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		<p>consider essential aspects. The results of the latest research also speak against this. In addition, other criteria such as checking the killing effect of hunting ammunition have not yet been adequately clarified. For us, therefore, a carefully considered decision based on scientific facts by the European Commission is necessary in the medium term, rather than any knee-jerk reaction which does not consider the full facts nor answer many, as yet unanswered questions. As long as the open questions have not been clarified and there are no at least equivalent alternatives, metallic lead (Pb) must continue to be available as a material for the manufacture and use of ammunition in the EU states, at least as a material component.</p> <p>It must still be possible to fall back on the positive properties of lead as a material for ammunition. From a technical point of view, an exaggerated restriction without weighing up interests is currently not expedient.</p> <p>In addition, there are still a lot of unanswered questions about the alternatives:</p> <p>a) Does the effectiveness of alternatives (i.e. killing effect) comply with animal welfare and applicable animal protection laws in the countries that are members of the CIP?  b) Does the use of alternatives comply with the legislation applicable in all countries (e.g. CIP)?  c) Is the safe use of alternative ammunition in existing weapons ensured (system compatibility)?  d) Are there any concerns about the increased risk potential of alternative materials (e.g. ricochets)?  e) Is consumer protection when consuming animals killed by alternative ammunition and the quality of game meat adequately ensured (food quality, toxicology)?  f) What direct or indirect toxicological effects do alternatives available on the market have on the environment (animal, plant and species protection)?  g) Are there studies on the ecotoxicity of alternatives?  h) Under which aspects is the weighting of any alternative materials carried out?  i) What are the costs associated with alternatives and can their availability be sustained in the quantities required over time?  j) What about the consideration and evaluation of the "overall ecological balance" (life-cycle analysis) of alternative materials (e.g. extraction, shipment, processing, etc.)?</p> <p>We strongly encourage you to consider, potentially answer, and ideally take up each of these points in your statement to the European Commission.</p>	
4481 2022/05/01	Individual, Belgium	<p><a href="#">4481 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330

4482 2022/05/01	Individual, Belgium	<a href="#">4482 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4483 2022/05/01	Individual, Belgium	Lead is a very common substance used in a multiplicity of uses which go from trivial and practically non-hazardous to large scale and quite hazardous. It is not a suitable substance to treat with an authorisation process due to the large number of tiny but essential uses in craft industries. It would be better to bring Lead under a broad based restriction that gives more scope for differentiating between uses where there are real risks that affect humans and environment and those where the exposure or emission is non-existent to trivial.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b> <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>
4484 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stainedglass window are much too short.	Please see response to comment # 3862
4485 2022/05/01	Club PSL, Other contributor, France	<a href="#">4485_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4488 2022/05/01	ederal Associations of the German Jewellery and Silverware Industry, Industry or trade association,	please see document attached (uploaded) <a href="#">4488_20220501-comments-vbv-lead.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

	Germany		<p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>  <b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b>  <b>C.1.2. Generic exemptions</b>  <b>C.1.3. Aspects not justifying an</b></p>
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			<p><b>exemption from authorisation</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>  <b>C.2.05 Lead used in analysis of fineness of gold alloys</b></p>
4489 2022/05/01	Individual, France	<p><a href="#">4489_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4490 2022/05/01	Individual, France	<p>Should lead be registered in Annex XIV, the sunset date for the stained glass window is much too short. As an example, cadmium and chromium, the process to set the sunsetdate took years and years. Please, be carefull to not destroy an artistic activity that has been enjoying the whole world since one millenium</p>	<p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b>  <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b>  <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p>
4491 2022/05/01	Didier QUENTIN VITRAUX, Company, France	<p><a href="#">4491_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4492 2022/05/01	Individual, Belgium	<p>Uses exempted from the authorisation requirement - Comments on uses (or categories of uses) that should be exempted, including reasons for that :</p> <p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p>	Please see response to comment # 4330

		<p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	
4493 2022/05/01	Individual, France	<p>Please don't touch this historical art. Large Stained glasses could not be made without lead. I made stained glass with several artists and we all took caution using gloves and mask when using lead bars. We used copper only for small stained glasses said "Tiffany"</p> <p>But according to your notification we will take more caution from now on.</p> <p>Sincerely</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4494 2022/05/01	Individual, Belgium	<p><a href="#">4494 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	<p>Please see response to comment # 4330</p>
4495 2022/05/01	Individual, France	<p><a href="#">4495 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	<p>Please see response to comment # 3862</p>
4496 2022/05/01	Individual, France	<p><a href="#">4496 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	<p>Please see response to comment # 3862</p>
4497 2022/05/01	Deutsche Gesellschaft für Kulturgutschutz e.V., National NGO,	<p>Request for exemption for the use of lead in designed windows, for the use of lead for the repair of lead roofs and facades and for the use of lead in the metal casting trade in relation to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4].</p>	

	Germany		Please see response to comment # 3875
		<a href="#">4497_EU-Verordnung - Chemieverordnung REACH - Novellierung - Anhang XIV - Blei - ICOMOS-ISC CSG-DGKS_2022.pdf</a>	
4498 2022/05/01	Individual, France		Please see response to comment # 3862
		<a href="#">4498_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	
4499 2022/05/01	Mélanie Lecointe, Company, France		Please see response to comment # 3862
		<a href="#">4499_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	
4500 2022/05/01	Flores Vitrail, Company, France		Please see response to comment # 3862
		<a href="#">4500_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	
4501 2022/05/01	BASTIEN MOSAIQUE VITRAIL, Company, France		Please see response to comment # 3862
		<a href="#">4501_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	
4502 2022/05/01	Individual, France		Please see response to comment # 3862
		<a href="#">4502_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	
4503 2022/05/01	Individual, France		Please see response to comment # 3862
		<i>Confidential attachment removed</i>	
4504 2022/05/01	Chambre Syndicale nationale du Vitrail, Trade union, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	Please see response to comment # 3862
		<a href="#">4504_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	
4506	Individual,		

2022/05/01	France	<a href="#">4506_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4507 2022/05/01	Individual, France	<a href="#">4507_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4508 2022/05/01	Individual, Germany	The lead prohibition is nothing but part of an ideological warfare against civilian possession and use of firearms. There is no real evidence of harmful effects on either nature or human life (except after a direct hit, but that is another pair of shoes). The recent development in Ukraine shows the essential necessity of an armed and trained populace in case of external aggression. "A well-regulated militia being necessary for the security of a free state, THE RIGHT OF THE PEOPLE TO KEEP AND BEAR ARMS SHALL NOT BE INFRINGED:"	Please see response to comment # 4153
4509 2022/05/01	Stiftung Spiel / Spielmuseum Soltau, Other contributor, Germany	<a href="#">4509_Briefe-ECHA-2022-05-01.pdf</a>	Please see response to comment # 3585
4510 2022/05/01	Individual, France	<a href="#">4510_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4513 2022/05/01	Individual, Russian Federation	<a href="#">4513_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4514 2022/05/01	Matières d'Expression, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">4514_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4515	Alexis Ferron,		

2022/05/01	Company, France	<a href="#">4515_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4516 2022/05/01	Anne Boeffard, Company, France	<a href="#">4516_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4517 2022/05/01	Individual, France	<a href="#">4517_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4518 2022/05/01	Individual, Germany	Bans and prohibitions without alternatives don't make any sense	Please see response to comment # 4287
4519 2022/05/01	Atelier de Vitrail Mise en Verre, Company, Switzerland	<a href="#">4519_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4520 2022/05/01	Individual, France	<a href="#">4520_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4521 2022/05/01	Individual, France	<a href="#">4521_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4522 2022/05/01	Individual, France	<a href="#">4522_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4523	Individual,		



2022/05/01	Switzerland	<a href="#">4523_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais[1].pdf</a>	Please see response to comment # 3862
4524 2022/05/01	Individual, France	<a href="#">4524_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4525 2022/05/01	Individual, France	<a href="#">4525_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4526 2022/05/01	Individual, Belgium	<a href="#">4526_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4527 2022/05/01	Individual, France	<a href="#">4527_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4528 2022/05/01	Individual, France	<a href="#">4528_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4529 2022/05/01	Individual, France	<a href="#">4529_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4530 2022/05/01	Individual, France	<a href="#">4530_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4531	Individual,		

2022/05/01	France	<a href="#">4531_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4532 2022/05/01	France, Member State	<a href="#">4532 Réponse Vitrail .docx</a>	Please see response to comment # 3862
4533 2022/05/01	Voile d'Iris, Other contributor, France	<a href="#">4533_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4534 2022/05/01	Magies Glas, Company, Netherlands	<a href="#">4534 Brief aan ECHA Europese commissie.pdf</a>	Please see response to comment # 3585
4535 2022/05/01	Individual, Belgium	<a href="#">4535 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4536 2022/05/01	ARVEILLER, Company, France	<a href="#">4536_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4537 2022/05/01	Individual, France	<a href="#">4537_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4538 2022/05/01	Museumsverband Baden- Württemberg e.V. , National NGO, Germany	see Attachment <a href="#">4538_2022_05_01_Protestbrief_Bleiverbot_ECHA.pdf</a>	Please see response to comment # 3585
4539	Individual,		

2022/05/01	France	<a href="#">4539_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais 2.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4540 2022/05/01	Individual, Germany	I 'm a hunter and sport shooter. For me it is very important that an animal has not to suffer. There are no go possibilities for huntig situations. Cu is on your Watchlist..... For hunting and sportshooting ist the use of lead ammounition necessary.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4541 2022/05/01	Individual, Germany	<p>Sehr geehrte Damen und Herren,</p> <p>eine generelle Zulassungspflicht für Blei, bezogen auf – Zitat aus dem geplanten Verordnungstext – „Herstellung, Lagerung, Ausstellung und Verwendung in allen seinen Erscheinungsformen“, bedroht und schädigt das technische Kulturerbe der gesamten Menschheit. Denn Mobilität ist seit Jahrhunderten ein globales Bedürfnis, welches sich in Straßen-, Schienen-, Wasser- und Luftfahrzeugen ausdrückt. In allen diesen Fahrzeugen ist bis heute Blei enthalten.</p> <p>Betrachtet man den Bereich der historischen Straßenfahrzeuge separat, würde eine generelle Zulassungspflicht vor allem kleine Organisationseinheiten wie Oldtimer- und Heimatmuseen sowie private Sammler und Besitzer treffen. Sie alle wären bürokratisch und finanziell überfordert, müssten sie Genehmigungen für ihr Tun einholen. Zumal Blei in jedem Fahrzeug mehrfach und in mehreren Funktionen verwendet wurde.</p> <p>Darüber hinaus beeinträchtigt eine generelle Zulassungspflicht für Blei das gesamte Kraftfahrzeughandwerk der Europäischen Union und dessen Lieferanten massiv. Letztere sind meist ebenfalls in der EU ansässig. Beide Bereiche – Kraftfahrzeughandwerk und Lieferanten – bestehen zu großen Teilen aus kleinen und mittleren Unternehmen (KMU).</p> <p>Im Kraftfahrzeughandwerk wird Blei heute vor allem zur historisch korrekten Instandsetzung und Restaurierung von Karosserien, Kühlsystemen sowie elektrischen und elektronischen Anlagen eingesetzt. Konkrete Beeinträchtigungen werden sich zum einen aus dem Verschwinden vieler dieser KMU ergeben, die sich den bürokratischen und finanziellen Aufwand der Zulassung von Blei nicht leisten können und deshalb die betreffenden Geschäftsfelder oder die gesamte Geschäftstätigkeit aufgeben.</p> <p>Zum anderen werden sich durch die Substitution von Blei durch weit weniger geeignete Ersatzstoffe folgende handwerkliche und historische Beeinträchtigungen ergeben:</p>	Please see response to comment # 3833

		<p>§ Die Instandsetzung von Schäden an Karosserien wird mit qualitativen Mängeln behaftet sein. Begründen lässt sich das mit der schwierigen Verarbeitung von bleifreiem Schwemzzinn. Das Temperaturfenster ist deutlich kleiner und das Temperaturniveau liegt signifikant höher als bei der Verarbeitung von bleihaltigem Schwemzzinn. Eine Restaurierung mit historisch korrektem Material und ebensolcher Arbeitstechnik wäre nicht mehr möglich.</p> <p>§ Qualitative Mängel werden auch bei der Instandsetzung von Kühlsystemen auftreten. Die Begründung ist mit dem vorherigen Punkt identisch.</p> <p>§ Nicht nur Mängel, sondern Schäden würden in elektrischen und elektronischen Anlagen entstehen. Denn über die negativen Auswirkungen des kleineren Temperaturfensters und des höheren Temperaturniveaus hinaus besteht die Gefahr fehlerhafter Reparaturlötstellen, sogenannter kalter Lötstellen. Zum einen, weil bleifreie und bleihaltige Lotmaterialien nicht kompatibel sind, also keine Verbindung miteinander eingehen. Zum anderen, weil bleifreie Lote die optische Qualitätskontrolle von Lötstellen unmöglich machen. Denn die stets matte Oberfläche einer mit bleifreiem Lot erstellten Lötstelle ist nicht von einer fehlerhaften Lötstelle (kalten Lötstelle) unterscheidbar. Mit bleihaltigem Lot ausgeführte, gelungene Lötstellen hingegen glänzen silbrig.</p> <p>Kurzum: Die Substitution von Blei würde die Reparatur von Fahrzeugen generell massiv erschweren und die Restaurierung historischer Fahrzeuge unmöglich machen. Auch das bedeutet Bedrohung und Beschädigung des technischen Kulturerbes. Und zwar tatsächlich der gesamten Menschheit, denn die Sammlung von und die Beschäftigung mit historischen Fahrzeugen macht für europäische Sammler und Handwerker an den Außengrenzen der EU nicht halt.</p> <p>Übrigens werden auch heute nahezu alle Neufahrzeuge, unabhängig von ihrem Antriebskonzept, mit 12-Volt-Batterien ausgeliefert, die auf dem Blei-Säure-Prinzip beruhen. Das betrifft also auch batterie- und wasserstoffelektrisch angetriebene Fahrzeuge sowie Hybridfahrzeuge, die allesamt auch eine 12-Volt-Spannungsversorgung benötigen. Für Batteriehersteller, die Teil großer Konzerne sind, ist es sicher unproblematisch, künftigen Blei-bezogenen Auflagen in bürokratischer und finanzieller Hinsicht gerecht zu werden. KMU hingegen können daran scheitern. Doch sind es gerade kleine Unternehmen, die historisch korrekte 6-Volt- und 12-Volt-Starterbatterien für Oldtimer herstellen und vertreiben.</p> <p>Um diese Mängel, Schäden und Risiken auszuschließen, enthält ein anderes EU-weit gültiges Regelwerk bereits eine Ausnahmeregelung für historische Fahrzeuge, aber auch für Fahrzeuge deutlich jünger als 30 Jahre: die EU-Altfahrzeugrichtlinie 2000/53. Konkret ist es der einleitende Text von Anhang II, der generell alle Ersatzteile – als solche gelten auch Reparaturmaterialien –, die für vor dem 1. Juli 2003 in Verkehr gebrachte Fahrzeuge bestimmt sind, ausnimmt. Damit wird das in Artikel 4, Absatz 2, Buchstabe a der Richtlinie formulierte und seit 1. Juli 2003 bestehende Verbot von Blei, Quecksilber, Cadmium und sechswertigem Chrom für diese Fahrzeuge ausgehebelt. Ausnahmen von dieser Ausnahme stellen lediglich Radwuchtgewichte, Kohlebürsten von E-Motoren und Bremsbeläge dar.</p>	
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Darüber hinaus enthält Anhang II der EU-Altfahrzeugrichtlinie mit den Punkten 8a und 8b zwei konkrete Ausnahmen für bleihaltiges Lötzinn:  
 § Punkt 8a betrifft Lot auf Leiterplatten, beispielsweise in Steuergeräten, in vor dem 1. Januar 2016 typgenehmigten Fahrzeugen  
 § Punkt 8b betrifft Lot in Kabelbäumen und anderen Bauteilen der elektrischen Anlage in vor dem 1. Januar 2011 typgenehmigten Fahrzeugen  
 Denkbar wäre, analog zur EU-Altfahrzeugrichtlinie auch eine Ausnahme für historische Fahrzeuge in die EU-Chemikalienverordnung 1907/2006 REACH aufzunehmen – für den konkreten Fall Blei ebenso wie generell auch für andere Stoffe. In diesem Zusammenhang: Wenn sich Regelwerke der EU nicht widersprechen, ist das für alle früher oder später Beteiligten bis hin zur Rechtsprechung hilfreich.

Auch ein anderes Regelwerk enthält eine Ausnahme für historische Fahrzeuge und kann hier als Beispiel dienen: die deutsche Lösemittelhaltige-Farben-und-Lack-Verordnung (ChemVOCFarbV). Die Ausnahme ist in Paragraph 3, Absatz 3b formuliert: „Abweichend von Absatz 1 dürfen gebrauchsfertige Produkte, die die Grenzwerte des Anhangs II für flüchtige organische Verbindungen nicht einhalten, in den Verkehr gebracht werden zum Zwecke der [...] Restaurierung und Unterhaltung von [...] Oldtimer-Fahrzeugen, die als historisch und kulturell besonders wertvoll eingestuft sind.“ Die Formulierung „historisch und kulturell besonders wertvoll“ findet sich bereits in der EU-Richtlinie 2004/42 (Decopaint-Richtlinie), die der deutschen ChemVOCFarbV zugrunde liegt.

Übrigens ist ein Großteil der Oldtimer längst als technisches Kulturgut und somit als historisch und kulturell besonders wertvoll anerkannt. In Deutschland wird das durch die Vergabe des sogenannten H-Kennzeichens deutlich, wobei das H für historisch steht. Vergleichbare Vorgehensweisen existieren auch in anderen Ländern der EU.

Zu den Themen Gesundheits- und Umweltschutz. Die Toxizität von Blei ist seit Jahrhunderten bekannt. Gesundheitsrisiken werden von den Mitarbeitern in Werkstätten, Autohäusern und Betrieben der Zulieferindustrie professionell und erfolgreich gehandhabt. Unter anderem die Verwendung von Absauganlagen und persönlichen Schutzausrüstungen (PSA) sorgt dafür, dass die vielen Hunderttausend Menschen, die im europäischen Kraftfahrzeughandwerk und bei Lieferanten arbeiten, dies sicher und mit kontrolliertem Risiko tun. Für verschlissene bleihaltige Fahrzeugteile und Rückstände der Verarbeitung von Blei bestehen bewährte Recyclingkreisläufe.

Auch Endverbraucher – hier: private Oldtimer- und Heimatmuseen sowie Sammler und Besitzer historischer Fahrzeuge – sind sich von Blei ausgehender Gefahren bewusst und setzen sich diesen nicht aus. Zumal das Schwermetall auch an historischen Fahrzeugen nicht offen zutage tritt.

		Peter Diehl	
		<a href="#">4541_Bitte um Ausnahmeregelung für Blei_Absender Peter Diehl.pdf</a>	
4542 2022/05/01	L'ATTRAPE LUMIERE, Company, France	<a href="#">4542_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4543 2022/05/01	Individual, Belgium	<a href="#">4543_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4544 2022/05/01	FRIEDENSMUSEUM Brücke von Remagen e.V., Company, Germany	<a href="#">4544_Brief EU.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.4. Control of risks A.1.5.6. Socio- economic benefits of continued use A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>
4545 2022/05/01	Individual, Germany	Sehr geehrte Damen und Herren, Sie vernichten mit dem Bleiverbot immaterielles Kulturerbe der Unesco, den Schützenverein, in dem ich Mitglied bin. Es gibt keine Alternativen beim Luftgewehr und Kleinkaliberschießen, ebenso wenig bei anderer Sportmunition. Damit würde der Schießsport in Europa im Keim erstickt, obwohl im Rest der Welt ohne Probleme weiter mit Bleimunitoin geschossen werden darf. Das ist Willkür und nicht im Sinne der Menschen in der EU, sondern nur im Sinne einzelner EU-Bürokraten, die sich profilieren wollen und andere Menschen mit Ihren Ideen schikanieren wollen! Mit einem Bleiverbot würden alle Sportschützen einfach nur diskriminiert werden. Zu allererst sollten unstrittige Alternativen ausgiebig getestet und bewertet werden. Wenn diese Alternativen sich tatsächlich bewähren, dann kann über einen Austausch der Bleimunition nachgedacht werden. Verbote gibt es nachweislich in Diktaturen! Wieso gibt es in der EU immer mehr Verbote???	Please see response to comment # 4411
4546	atelier kb,		

2022/05/01	Company, France	<a href="#">4546_2022.04.25. - CNSV - Rf@ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4549 2022/05/01	ATELIER DYL VITRAIL SARL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short  <i>Confidential attachment removed</i>	Please see response to comment # 3862
4550 2022/05/01	Individual, Belgium	<a href="#">4550 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4551 2022/05/01	Individual, France	<a href="#">4551_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4552 2022/05/01	Individual, Belgium	<a href="#">4552 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4553 2022/05/01	GE Medical Systems SCS, Company, France	<ul style="list-style-type: none"> <li>• We are using lead or lead contained alloys for welding and soldering processes, which include soldering circuits on circuit boards, MR coil production, Monitoring solution device production.</li> <li>• We are using lead under multiple circumstances for ionizing radiation protection in medical imaging applications, nuclear medicine and specialist customers e.g. hospitals and pharmacies, make use of these products containing lead upon receipt.</li> </ul> <ol style="list-style-type: none"> <li>1). Lead used for shielding in equipment, like hot cells, automated capsule production, automated inspection systems in radioactive product plant. Lead is contained in the construction of manufacturing facilities to provide protection required by health and safety regulations.</li> <li>2). Lead shielding sheet is covered by stainless steel or as painted lead blocks used in the manufacturing plant, lead shielded pots for secondary packaging of products, for shielding waste containers and lead shielded trolleys for transportation in the manufacturing facility.</li> <li>3). Radio pharmacies use lead plates/blocks/containers as shielding to provide the protection required by health and safety regulations.</li> <li>4). Lead pots covered by plastics or paints are used to contain / shield radioactive open sources (radionuclides) within products during transportation to customers and for storage at customer locations. Transportation is controlled by IAEA regulations, which sets limits on permitted levels</li> </ol>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.1.2. Generic exemptions</b> <b>C.2.06 Exemption request for uses in medical devices</b>

		<p>of radiation from the surface of shipped materials. In order to achieve these limits it is necessary to use lead as shielding material within product secondary packaging.</p> <p>5). Lead used in the instruments of chemical process for cyclotron to shield operator and other internal electronic parts in the instrument.</p> <p>6). Lead shielding is contained within isotope generators supplied and stored by customers. The annual lead use in lead container for nuclear medicine product is around 180~200 ton. Lead contained in the instruments of chemical process for cyclotron to shield operator and other internal electronic parts in the instrument, are around 8 Ton on the current market globally, The estimation in EU is 5 ton. The lead used in the our existing nuclear medicine manufacturing installations for shielding are around 330~340 ton.</p> <p>Generally, medical imaging has revolutionized the diagnosis and treatment of numerous medical conditions from broken bones to cancer treatment. The radiation used in these processes can damage DNA and could therefore increase the risk of developing cancer. For this reason, the facilities are strictly regulated to ensure that radiation exposure is both controlled and minimized for the patient and staff alike. Effective radiation shielding is therefore essential to protect staff and patients. And so far there are no materials which can compete effectively with lead. Its abilities are so unparalleled that the radiation shielding of non-lead materials is reported in 'lead equivalents' i.e. the thickness of that material that is needed to give the same radiation protection as lead under the same conditions. Lead also offers unique advantages over other metals in terms of availability and sustainability. High-density materials based on tungsten, bismuth and barite can provide similar radiation shielding properties but as their supply is already critical at EU level, further expansion of their use in radiation shielding is not sustainable. Derived Uranium can be another possible alternative; however it is classed as even more toxic and hazardous than lead.</p> <ul style="list-style-type: none"> <li>• Lead contained within batteries is used in vehicles operating at manufacturing sites to transport goods and materials. Lead-acid batteries are also sold with the equipment supplied by GE Healthcare, such as in Uninterruptable Power Supplies.</li> </ul>	
4554 2022/05/01	Individual, Germany	<p><i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b></p>



			<p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b></p>
4555 2022/05/01	Individual, United States of America	There need to be special accommodations for stained glass artists. They work very hard to minimize hazards with lead and banning it will jeopardize their art.	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4556 2022/05/01	Individual, France	<p>Attractivité de Communes françaises :</p> <p>Je suis actuellement Adjoint au Maire d'une commune de 6000 habitants proche de Marseille (Roquefort-la Bédoule); La Ville souhaiterait développer son attractivité et son image par l'implantation de vitraillistes et verriers. Ces métiers d'art, utilisent du plomb irremplaçable par une autre substance et sans danger pour le consommateur.</p> <p>Une telle interdiction porterait un coup fatal à l'attractivité de nombreuses villes française où ces activités d'art liées au plomb : verreries, cristalleries, poteries, vitraux sont génératrices</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p>

		<p>d'attractivité spécifique, d'emplois et d'exportations.  Potier à la retraite j'ai dirigé une entreprise de poteries vernissées traditionnelle, (jusqu'à 8 emplois à temps plein) utilisatrice de plomb, qui réalisait 80% de son chiffre d'affaires à l'exportation. Tous les objets produits et exportés passaient sans problème aux normes alimentaire FDA.  Je vous remercie.  Philippe BELTRANDO  Adjoint délégué à la politique culturelle au commerce et à l'artisanat  Philippe.beltrando@roquefort-labedoule.fr  06 35 39 72 30</p>	<p><b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4558 2022/05/01	Individual, Belgium	<p><a href="#">4558 CONTRIBUTION Anglais 01-05-2022 Aurelie Moreau.pdf</a></p>	Please see response to comment # 3862
4559 2022/05/01	Individual, Belgium	<p><a href="#">4559 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4560 2022/05/01	Individual, France	<p><a href="#">4560 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4561 2022/05/01	Individual, France	<p><a href="#">4561 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>  Confidential attachment removed</p>	Please see response to comment # 3862
4562 2022/05/01	Individual, Germany	<p>Sehr geehrte Damen und Herren,</p> <p>das Material Blei ist Bestandteil von Kunst- und Kulturgut fast aller Epochen und Gattungen, insbesondere des Industriellen Kulturguts, kunsthandwerklicher Objekte, Metallskulpturen, Musikinstrumenten, historischen Gebäuden, archäologischen Objekten oder Glasmalerei.</p> <p>In künstlerischer oder funktionaler Verwendung begegnen wir Blei beispielsweise als gegossene Bleifiguren oder –skulpturen, Wuchtgewichte im technischen Kulturgut oder bei Tasteninstrumenten, Orgelpfeifen, historischer Munition und Waffen, als Bleiverglasungen von</p>	Please see response to comment # 4554

		<p>Glasfenstern, in der Architektur als Walzblei im Dach- und Fassadenbereich, als Rohre und Leitungen oder Bleiverstimmungen im Stein. Bleiverbindungen sind auch als Pigmente in historischen Korrosionsschutzanstrichen, Farbfassungen von Gemälden, Skulpturen und Möbeln enthalten, ebenso in bleihaltigen Keramikglasuren, Emails oder Bleikristallglas.</p> <p>Restaurator:innen schützen und erhalten diese Objekte und Werke des kulturellen Erbes[1] für die langfristige Nutzung, Forschung und Wissensvermittlung. Ihre Tätigkeiten bestehen in der wissenschaftlichen und praxisorientierten Erforschung und Bewahrung von Material, und Herstellungstechniken im kulturellen Kontext sowie in der Entwicklung, Planung und Durchführung von Maßnahmen für deren Erhalt.</p> <p>Ohne Blei können wichtige Bereiche der Konservierung-Restaurierung in unseren Museen und der Denkmalpflege nicht mehr ausgeführt werden. Darüber hinaus ist dieses Material für den Fortbestand des Wissens um historische Techniken und für deren Rekonstruktionen unverzichtbar.</p> <p>Die Toxizität von Blei und seinen Korrosionsprodukten ist sehr gut bekannt und seine Gesundheitsrisiken werden in der Branche professionell gehandhabt. Die Verwendung von Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests im Rahmen ausformulierter Betriebsanweisungen sorgen für einen kontrollierten Umgang mit dem Gefahrstoff und minimieren das gesundheitliche Risiko.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung, Transport und Präsentation von Kunst- und Kulturgut von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Erhalt und die Präsentation dieser Werke in Museen, Archiven, Sammlungen, Kirchen und öffentlichen Gebäuden erschweren, sondern auch den Lebensunterhalt von Restaurator:innen, die für den Erhalt unseres bedeutenden Kulturerbes in Europa arbeiten.</p> <p>Mit freundlichen Grüßen Gisela Gulbins</p>	
<p>4563 2022/05/01</p>	<p>Individual, Australia</p>	<p>Lead is an integral part of the production of stained glass windows. If it were to be limited/restricted to artists who work in this medium, then the medium would cease to exist. This would apply to any new work being produced, but also to any restoration projects that might happen in the future.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b></p>

4564 2022/05/01	Individual, Belgium	<a href="#">4564 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4565 2022/05/01	Individual, French Southern Territories	<a href="#">4565 ECHA Lead ICOMOS ICOM ECCO letter Godot Marie.pdf</a>	Please see response to comment # 3875
4566 2022/05/01	Individual, France	<a href="#">4566 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4567 2022/05/01	Le Temps du Vitrail, Company, France	<a href="#">4567 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4569 2022/05/01	Individual, Belgium	<a href="#">4569 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4570 2022/05/01	Individual, France	<a href="#">4570 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais[1].pdf</a>	Please see response to comment # 3862
4572 2022/05/01	Les Vitraux du Heron, Company, France	<a href="#">4572 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4574 2022/05/01	Individual, France	<a href="#">4574 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862

4576 2022/05/01	Individual, France	<a href="#">4576_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4577 2022/05/01	sarl Atelier Saint Clair, Company, France	<a href="#">4577_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4578 2022/05/01	Couleur vitrail, Company, France	<a href="#">4578_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4579 2022/05/01	l'atelier d'anne sophie, Company, France	<a href="#">4579_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4580 2022/05/01	Highcliffe Castle, Other contributor, United Kingdom	The craft of Stained Glass is 1000 years old and is an intrinsic part of our European art historical legacy. Our ancient stained glass is an art than originated in Europe and deserves to be protected for future generations. We cannot conserve and repair our stained glass heritage without lead. This is not just an ethical conservation issue but also one of practicality. <a href="#">4580_ECHA Letter Jarron.pdf</a>	Please see response to comment # 3585
4581 2022/05/01	SARL Bellion, Company, France	<a href="#">4581_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4583 2022/05/01	O bout de verre, Company, France	<a href="#">4583_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4584 2022/05/01	Individual, France	<a href="#">4584_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862

4585 2022/05/01	CHAMBRE SYNDICALE NATIONALE DU VITRAIL, Regional or local authority, France	<a href="#">4585_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4586 2022/05/01	Individual, France	<a href="#">4586_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4587 2022/05/01	Individual, France	<a href="#">4587_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4588 2022/05/01	Maison Lorin, Company, France	Je suis maître verrier (vitrailliste). J'utilise des profilés de plomb pour sertir des pièces de verres afin de créer des vitraux. Je travaille depuis 20 ans pour la restauration conservation du patrimoine et pour la création de vitraux d'art. A l'heure actuelle il n'existe aucune alternative à l'utilisation de ce métal. Les vitraux ne représentent pas de danger pour le consommateur car ils servent seulement de clôture de fenêtre, et sont majoritairement présent dans les édifices historiques.  <i>Confidential attachment removed</i>	Please see response to comment # 3875 and 3805
4589 2022/05/01	Individual, Germany	Bei allen Verboten ist die Verfügbarkeit von Alternativen zu analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution sind zu berücksichtigen. Nur so können Fehlentscheidungen vermieden werden, die die europäische Industrie unumkehrbar schädigen und auch den Schießsport in Europa - vor allem auch im internationalen Vergleich - nachhaltig benachteiligen. Schießsport und Schützenwesen sind hierbei existenziell bedroht. Bitte beachten Sie hierbei auch, dass das deutsche Schützenwesen immaterielles Weltkulturerbe der UNESCO ist. Verbote ohne Alternativen bedeuten stets das Ende!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b>

			<b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>
4590 2022/05/01	Atelier Thomas Masson, Company, France	<a href="#">4590_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4591 2022/05/01	Individual, France	<a href="#">4591_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4592 2022/05/01	Individual, France	<a href="#">4592_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4593 2022/05/01	Hungarian Association of Conservators/Restorers, Other contributor, Hungary	<i>Confidential attachment removed</i>	Please see response to comment # 3875
4594 2022/05/01	Individual, France	<a href="#">4594_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4596 2022/05/01	Individual, France	<a href="#">4596_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4597 2022/05/01	Vitrail & Fines Herbes, Company, France	<a href="#">4597_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862

4598 2022/05/01	ATELIER VITRAIL DU LEMAN, Company, France	<a href="#">4598_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4599 2022/05/01	Individual, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p> <p><a href="#">4599 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4600 2022/05/01	Individual, France	<a href="#">4600_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4601 2022/05/01	Individual, France	le patrimoine et ses filières ne doivent pas être touchées par ce règlement ; le plomb est tout à fait géré dans les ateliers concernés pour le patrimoine et la création. Ce règlement n'est donc pas utile au niveau des maîtres verriers et vitraillistes. Nous ne devons pas perdre ni le patrimoine vitrail, ni la création vitrail.	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4602 2022/05/01	LE JARDIN DU VITRAIL, Company,	<a href="#">4602_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	



	France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4603 2022/05/01	Individual, France	<a href="#">4603_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4605 2022/05/01	Chambre Syndicale Nationale du Vitrail, Trade union, France	<a href="#">4605_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4606 2022/05/01	Individual, France	<a href="#">4606_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4607 2022/05/01	Vitrail Saint-Georges, Company, France	<a href="#">4607_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4608 2022/05/01	Individual, France	<a href="#">4608_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4609 2022/05/01	Individual, France	<a href="#">4609_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4610 2022/05/01	Individual, France	<a href="#">4610_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4611 2022/05/01	Individual, France		

		<i>Confidential attachment removed</i>	Please see response to comment # 3862
4612 2022/05/01	Individual, France	<a href="#">4612_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4613 2022/05/01	Individual, Italy	The ban of ammunition with lead based projectiles will do way more harm than good. People will lose their jobs in weapon and ammunition producing companies, nature will suffer because of fewer hunters and shooting sports will take a massive hit. At the same time multiple regulatory challenges will arise without creating any positive impact on environment and health. This equation does simply not work out in favor of a ban of lead based ammunition.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4614 2022/05/01	Heimatverein Dittmannsdorf e.V., Other contributor, Germany	<a href="#">4614_Votum_Blei-Ausnahmeregelung_an_ECHA_von_Heimatverein_Dittmannsdorf_e.V.pdf</a>	Please see response to comment # 4554
4615 2022/05/01	Individual, France	<a href="#">4615_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4616 2022/05/01	Atelier Vitrail Fusing Peinture, Company, France	<a href="#">4616_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4617 2022/05/01	Atelier Chazot / Art'Corpus, Company, France	<a href="#">4617_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4618	Individual,		

2022/05/01	France	<a href="#">4618_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4619 2022/05/01	Glasmalerei Frese GmbH, Company, Germany	<a href="#">4619_Kommentar Bleiverbot Echa.pdf</a>	Please see response to comment # 3585
4620 2022/05/01	LEX z.s., National NGO, Czech Republic	<p>- Z�kaz olova v civiln�m st�elivu negativn� ovlivn� bezpečnost a obranyschopnost evropsk�ch zem�. Proto�e i p�es existenci �lanku �l�nek 346, bod 1., p�ism. b) (KONSOLIDOVAN� ZN�N� SMLOUVY O EVROPSK� UNII A SMLOUVY O FUNGOV�N� EVROPSK� UNIE (2008/C 115/01) stanov�: „ka�d�y �lensk�y st�t m��e u�init opat�ren�, kter� pova�uje za nezbytn� k ochran� podstatn�ch z�jm� sv� bezpečnosti a kter� jsou spjata s v�robou zbran�, st�eliva a v�le�n�ho materi�lu nebo obchodem s nimi; tato opat�ren� nesm� nep�r�zniv� ovlivnit podm�nky hospod�rsk� sout��e na vnit�rn�m trhu s v�robky, kter� nejsou ur�eny v�lu�n� k vojensk�m u�el�m.“ hroz�, �e se v�robc�m st�eliva ekonomicky nevyplat� dr�et linky na v�robu obou typ� st�eliva (olov�n�ho i neolov�n�ho). V takov�m p�r�pad� hroz� p�esun v�robn�ch kapacit st�eliva mimo evropsk� hospod�rsk�y prostor, co� obzvl�st�e v sou�asn� bezpečnostn� situaci na evropsk�m kontinent� nepova�ujeme za moudr�.</p> <p><a href="#">4620_LEX_attchmnt.zip</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.05: Use or sector specific arguments on lead for its inclusion in Annex XIV</b>  <b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b></p>
4621 2022/05/01	Individual, France	<a href="#">4621_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4622 2022/05/01	Individual, France	<a href="#">4622_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4623 2022/05/01	Individual, Belgium	<a href="#">4623 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4624 2022/05/01	Individual, France	<a href="#">4624 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4625 2022/05/01	Individual, Belgium	<a href="#">4625 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4626 2022/05/01	ICOMOS Belgium, National NGO, Belgium	<a href="#">4626 IBE - ECHA - Plomb - VF.pdf</a>	Please see response to comment # 3875
4627 2022/05/01	Individual, Germany	<a href="#">4627 220401 Delp-ECHA Blei.pdf</a>	Please see response to comment # 4554
4629 2022/05/01	Individual, France	<a href="#">4629 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4630 2022/05/01	Individual, Belgium	<a href="#">4630 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4631 2022/05/01	Individual, Belgium	<a href="#">4631 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4633 2022/05/01	Individual, Belgium	<a href="#">4633 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4634 2022/05/01	Individual, Germany	<a href="#">4634 Brief Bleiverbot ECHA Tom Frisch.pdf</a>	Please see response to comment # 4554
4635 2022/05/01	Individual, Germany	<p>Susanne Wolf Wolf Glas und Kunst Glaskünstlerin Glasmalermeisterin Malerin Am Nellenberg 23, 87480 Kleinweiler</p> <p>Betreff: Bitte um Ausnahmeregelung für die Verwendung von Blei in Glasgestaltungen (z.B. gestalteten Fenstern) bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4];</p> <p>Gefahr für unser europäisches kulturelles Erbe und für die Kunstgattung der Glasmalerei;</p> <p>Gefahr der Zerstörung der Berufsausübung für Glaskünstler, Glasmaler und Glasmalerei-Restauratoren;</p> <p>Sehr geehrte Damen und Herren,</p> <p>in meinem Atelier für Malerei und Glasgestaltung entwerfe und fertige ich seit meiner Ausbildung zur Glas-und Porzellanmalermalermeisterin 1997 Glasgestaltungen u.a. als Glasmalerei mit Bleiverglasung überwiegend für den Architekturbereich.</p> <p>Das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei und als Bestandteil der Glasschmelzfarben, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von künstlerisch gestalteten Glasmalereien.</p> <p>Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten</p>	Please see response to comment # 3585

		<p>Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich), den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA).</p> <p>Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.</p> <p>Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.</p> <p>Aber nicht nur in der Vergangenheit sind durch diese Kunstgattung beeindruckende Zeugnisse menschlicher Kreativität entstanden. Auch moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüppertz und Gerhard Richter haben in der Glasmalerei faszinierende und weltbekannte Werke geschaffen.</p> <p>Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine neuen großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, da dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.</p> <p>Die Toxizität von Blei ist sehr gut bekannt, und in meiner Ausbildung zur Glas- und Porzellanmalerin habe ich - wie alle professionellen Glasmaler, Glaskünstler und Restauratoren - gelernt seine Gesundheitsrisiken wirksam zu handhaben. Die Verwendung von z.B. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass ich und meine vielen Kollegen in der ganzen Welt, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig kontrollierten Risiko tun.</p> <p>Überdies geht von den Glaskunstwerken selbst, z.B. in der Funktion als Fenster in einem Bauwerk, keinerlei Gesundheitsgefahr aus.</p> <p>Ich fordere daher die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen.</p> <p>Ein solches Verbot würde nicht nur meinen Lebensunterhalt und den von vielen anderen Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten, sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren.</p>	
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		<p>Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen</p> <p>Susanne Wolf</p>	
4636 2022/05/01	Individual, France	<p><a href="#">4636_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> Confidential attachment removed</p>	Please see response to comment # 3862
4637 2022/05/01	Individual, Belgium	<p><a href="#">4637_Document ECHA Cedric Chapelle.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>  <b>C.1.3. Aspects not justifying an</b></p>

			<b>exemption from authorisation</b>
4638 2022/05/01	Individual, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p> <p><a href="#">4638 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4639 2022/05/01	Erlebniswerkstatt Buchdruck-Museum Soltau e.V., National NGO, Germany	<p>see attachment</p> <p><a href="#">4639 Schreiben ECHA 01.05.2022, Seiten 1 und 2.zip</a></p>	Please see response to comment # 4554
4642 2022/05/01	Individual, Germany	<p>For restoration of glasswindows lead is highly needed. We can not work without it, because it is part of the art. We can't work properly if lead will be forbidden. This will be the death of the Working group of Conservators and the glasswindows it self in restoration or as an artificial element.</p> <p><a href="#">4642 Brief Echa 1.pdf</a></p>	Please see response to comment # 3585
4643 2022/05/01	Individual, France	<p><a href="#">4643 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4644 2022/05/01	association culturelle de Méricourt atelier vitrail, Other contributor, France	<p><a href="#">4644 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4645 2022/05/01	ARGE – The European Federation of Associations of	(1) Lead (Pb) is already a restricted substance under REACH Annex XVII Entry 63. This offers sufficient possibilities for further restricting and reducing the use of lead. Hence, including lead in REACH Annex XIV is not required.	<b>A.2.01 Questioning the way other Regulatory Risk management</b>



	Locks & Builders Hardware Manufacturers, Industry or trade association, Germany	(2) The Commission should postpone the inclusion of further substances in REACH Annex XIV until the revision of the REACH Regulation is concluded in order to avoid legal uncertainty.	<b>activities have been considered when prioritising the substance</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete</b>
4646 2022/05/01	Individual, Germany	<a href="#">4646_Blei-Ausnahmereglung-Brief-Vorlage_ECHA.pdf</a>	Please see response to comment # 4554
4647 2022/05/01	figawa - Bundesvereinigung der Firmen im Gas- und Wasserfach e.V., Industry or trade association, Germany	<p>Based on its classification as toxic to reproduction, lead is proposed for inclusion in the candidate list for authorization. We understand from the prioritization approach that the broad distribution of uses is evaluated based on the types of actors relevant to the use of the substance, taking into account the fact that the broad distribution decreases from consumer to industrial uses. In addition, the general presence of lead in some articles supplied for industrial and consumer use increases the prioritization level.</p> <p>Fittings Among the manufacturers of fittings, lead is used, for example, in the processing of brass alloys in foundries for the production of articles. The use of the substance lead in this industry is therefore limited to the industrial level (SU15) and there are no uses by craftsmen or consumers. Although other companies in the industry have somewhat different technical setups, suppliers of fittings generally have either remelting equipment, where standard brass alloys are remelted and cast into the final shape, or other processes, where brass is transformed from a standard shape into the complex shape of a fitting body. The quantities of lead in brass alloys differ from manufacturer to manufacturer. In view of the proposed registration data on manufactured and/or imported lead quantities (ECHA, 2021), the lead quantity, which is rather low for fittings and can therefore be assessed as negligible, is also an important factor for the</p>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>

		<p>possible future registration of lead applications.</p> <p><b>Drinking water regulations</b> Potential migration into drinking water is well controlled by the recently revised Drinking Water Directive, which sets stricter safety limits for lead in drinking water. For lead, the revised directive introduces a stricter limit than that currently recommended by WHO. More importantly, substitution, whenever technically and economically feasible, is addressed in the revised Directive in Article 10.3(f). The revision now includes a review mechanism that will involve ECHA and RAC and is similar to the authorization process. ECHA is now involved in the process of establishing European positive lists of approved substances for the manufacture of materials that come into contact with drinking water. A review mechanism is provided whereby each entry on the positive lists is assigned an expiration date, so that companies wishing to maintain the use of a substance must submit a review request by the specified expiration date. The Risk Assessment Committee (RAC) reviews applications and issues opinions that allow the Commission to decide whether an entry should be maintained, modified or removed from the positive lists. The sanitation industry strictly adheres to these regulations to ensure the protection of its employees, consumers and the environment. To this end, national drinking water organizations such as KIWA in the Netherlands and DVGW in Germany regularly conduct product and production audits at sanitary companies. We believe that all of these elements should be considered in the prioritization process and that it is warranted to defer the recommendation for lead inclusion due to ongoing work on other regulatory processes.</p> <p><b>Lead emissions</b> Potential emissions from the use of alloys are considered negligible, as the release is more likely to occur at the waste stage (Plomb et principaux composés, Ineris, 2015). However, our industry is strongly based on recycling and is in line with the objectives of the circular economy. This prevents uncontrolled release of lead, as products reaching the end of their life return to the production cycle, where environmental releases are fully controlled by the Industrial Emissions Directive, currently under revision as part of the European Green Deal. In addition, lead emissions from industrial use in the EU have declined dramatically in recent decades. According to the International Lead Association (ILA) and data from the European Pollutant Release and Transfer Register (E-PRTR), lead emissions to air have decreased by 88% and emissions to water by 80% between 2007 and 2020.</p> <p><b>Worker exposure</b> Worker exposure is controlled by occupational safety laws, which are also under review: o The Chemical Agents Directive (CAD - Chemicals Agents Directive), which is currently being revised in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027, which have set ambitious targets to further protect workers from</p>	<p><b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b> <b>A.2.11 Postpone recommendation considering COM decision to postpone inclusion of other recommended lead compounds in Annex XIV</b> <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b> <b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b> <b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b> <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b> <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b> <b>B.2.01. Request extra long LAD</b> <b>B.2.02 Difficulty/time needed to prepare joined AfAs and</b></p>
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		<p>workplace risks and with occupational health and safety, with the aim of achieving a zero approach to work-related fatalities in the EU.</p> <p>o The recently amended Carcinogens and Mutagens Directive (CMD), which sets limits for inorganic lead and its compounds, as well as biological limits and health surveillance measures that will strengthen the protection of workers from possible exposure to lead.</p> <p>We also note that the next draft amendment to Annex XIV is currently under preparation. (<a href="https://ec.europa.eu/info/law/better-regulation/haveyour-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-listof-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/haveyour-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-listof-substances-of-very-high-concern-in-Annex-XIV_en</a>)</p> <p>It addresses seven lead compounds for which the Commission considers it appropriate to postpone its decision due to the ongoing review of CAD.</p> <p>Consumer exposure</p> <p>Potential releases of lead from end products are not expected because these products are coated for corrosion protection, which avoids exposing consumers to brass.</p>	<p><b>uncertainty whether authorisation will be granted</b></p> <p><b>B.2.03 Joined AfAs result in shorter review periods</b></p> <p><b>B.2.04 Require longer time between LAD and SSD (e.g. minimum 30 months) considering the considerable number of AfA to be expected and ECHA's capacities</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
4648 2022/05/01	Individual, France	<p><a href="#">4647 Statement figawa - EU Authorization requirement LEAD DE-EN.zip</a></p>	
		<p><a href="#">4648 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	<p>Please see response to comment # 3862</p>
4649 2022/05/01	Association de Conservateurs-Restaurateurs d'Oeuvres d'Art/ Beroepsvereniging voor Conservators-Restaurateurs van Kunstvoorwerpen (APROA-BRK),	<p><a href="#">4649 APROA-BRK Letter to ECHA.pdf</a></p>	<p>Please see response to comment # 3740</p>

	Industry or trade association, Belgium		
4650 2022/05/01	Individual, Belgium	<a href="#">4650 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4651 2022/05/01	Alchimie du Verre, Company, France	<a href="#">4651 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4652 2022/05/01	Individual, Belgium	<a href="#">4652 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4653 2022/05/01	ATELIER PIERRE DESCAMPS, Company, France	<a href="#">4653 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4654 2022/05/01	Individual, France	<a href="#">4654 ECHA Lead AnaisBesnard FR.pdf</a>	Please see response to comment # 3740
4655 2022/05/01	VirJi, Company, France	<a href="#">4655 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4656 2022/05/01	Glasbau Gerber, Company, Germany	<a href="#">4656 Bleiverbot ECHA TT.pdf</a>	Please see response to comment # 3585
4657 2022/05/01	Individual, France	<a href="#">4657 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

		<i>Confidential attachment removed</i>	Please see response to comment # 3862
4658 2022/05/01	Glasbau Gerber, Company, Germany	<a href="#">4658 Bleiverbot ECHA PB.pdf</a>	Please see response to comment # 3585
4659 2022/05/01	FAB LUZ VITRIL, Company, France	<a href="#">4659 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4660 2022/05/01	Individual, France	<a href="#">4660 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4661 2022/05/01	Individual, France	<a href="#">4661 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4662 2022/05/01	Individual, France	<a href="#">4662 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais 6.pdf</a>	Please see response to comment # 3862
4663 2022/05/01	Individual, France	<a href="#">4663 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4664 2022/05/01	Individual, France	<a href="#">4664 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4665 2022/05/01	Individual, France	<a href="#">4665 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

		<i>Confidential attachment removed</i>	Please see response to comment # 3862
4666 2022/05/01	Individual, France	<a href="#">4666_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4667 2022/05/01	Vitraux d'hier et d'aujourd'hui, Company, France	<a href="#">4667_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4668 2022/05/01	Individual, France	<a href="#">4668_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4669 2022/05/01	Atelier de vitrail Amélie Jost, Company, France	<a href="#">4669_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4670 2022/05/01	Individual, Germany	Meiner Meinung nach gibt es keine Alternative zu Blei! Ich sehe keinen Nutzen im Verbot von Blei, sondern enorme Kosten. Aus meiner Sicht eine sinnlose und ideologische Aktion!	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4671 2022/05/01	Individual, Germany	<a href="#">4671_Ausnahmeregelung_Bleisatz-EU.pdf</a>	<b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>

			<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4672 2022/05/01	RenoVitro, Company, Belgium	<a href="#">4672 Annex XIV of the REACH regulation.docx</a>	Please see response to comment # 4330
4673 2022/05/01	Individual, France	<a href="#">4673 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4675 2022/05/01	Individual, France	<a href="#">4675 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4676 2022/05/01	Individual, Belgium	<a href="#">4676 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4677 2022/05/01	Individual, France	<a href="#">4677 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais 6.pdf</a>	Please see response to comment # 3862
4678 2022/05/01	Individual, France	<a href="#">4678 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais 5.pdf</a>	Please see response to comment # 3862
4679 2022/05/01	Individual, France	<a href="#">4679 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4680	Individual,		

2022/05/01	France	<a href="#">4680_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4681 2022/05/01	Individual, France	<a href="#">4681_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4682 2022/05/01	Individual, Italy	<a href="#">4682_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais 7.pdf</a>	Please see response to comment # 3862
4683 2022/05/01	Individual, France	<a href="#">4683_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4684 2022/05/01	Atelier Laurine Claude, Company, France	<a href="#">4684_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4685 2022/05/01	Commune Le Le Ménil- Scelleur, Regional or local authority, France	<a href="#">4685_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4686 2022/05/01	France, Member State	<a href="#">4686_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4687 2022/05/02	Atelier A Fleur de Verre, Company, France	<a href="#">4687_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4689			



2022/05/02	Association La Pierre Scellée pour la sauvegarde du patrimoine communal du Ménil-Scelleur, Other contributor, France	<a href="#">4689_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4690 2022/05/02	Individual, France	<a href="#">4690_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4691 2022/05/02	Pierre Bertin Vitraux, Company, France	<a href="#">4691_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4692 2022/05/02	Individual, Germany	<a href="#">4692_Ausnahmeregelung_Bleisatz-ECHA.docx</a>	Please see response to comment # 4671
4693 2022/05/02	Individual, France	<a href="#">4693_ECHA_Lead_ICOMOS_ICOM_ECCO_JointStatement_20220426_EN.pdf</a>	Please see response to comment # 3875
4694 2022/05/02	Hélène Fortin-Rincé, Company, France	<a href="#">4694_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4695 2022/05/02	Individual, France	<a href="#">4695_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4696 2022/05/02	Individual, France	As a drawer and designer for stained glass conservation and creation, I will not be able to pursue my activity in this field. Stained glass does not have an alternative for lead use. <a href="#">4696 lettre consultation plomb Ateliers d'Art de France.pdf</a>	Please see response to comment #

		<i>Confidential attachment removed</i>	3805
4697 2022/05/02	Test and Measurement Coalition, Industry or trade association, Belgium	<p>According to ECHA's Draft Background document for lead, the estimated volume of lead in the scope of authorization is more than 10 000 t/y. The information from registration dossiers and article notifications to ECHA, indicates that lead used in articles, including electronics is more than 10t/y. Consequently ECHA attributes high score for high volume and wide dispersiveness of uses.</p> <p>We strongly recommend that the information on tonnages is updated to reflect the volume of currently used. As a result of numerous regulatory measures in Europe in the past decades, the use of lead has been substantially restricted and therefore the volumes have been reduced.</p> <p>Our sector is a good example illustrating this trend. The industrial test and measurement equipment has been brought into the scope of RoHS in 2011, with the restriction of lead start applying as of July 2017. Our members however started re-designing their products as early as in 2005 which led to total phase out of lead in many applications.</p> <p>A survey conducted in 2019 by the Test &amp; Measurement Coalition shows the volume reduction of use of lead in products placed on the market by our members on the EEA market. The figures include also products imported to the EU, which are not in the scope of Authorisation. Therefore the volume of lead in scope of the authorisation, used in industrial test and measurement equipment is even lower.</p> <p><a href="#">4697_Test and Measurement Coalition input ECHA consultation lead 22 April 22.pdf</a></p>	<p><b>A.1.1.2. Legal basis for prioritisation</b>  <b>A.1.1.3. Prioritisation approach applied</b>  <b>A.1.1.4. Information taken into consideration for the draft recommendation</b>  <b>A.1.2.1. Volume in the scope of authorisation</b>  <b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.2.02 Questioning the volume score</b>  <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>  <b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b>  <b>A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation</b>  <b>B.1.2. Aspects not considered by ECHA when proposing latest</b></p>

			<p><b>application dates/sunset dates</b>  <b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users)</b>  <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b>  <b>B.2.01. Request extra long LAD</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>  <b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b>  <b>C.2.06 Exemption request for uses in medical devices</b></p>
4698 2022/05/02	Individual, France	<a href="#">4698_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4700 2022/05/02	Unterieser Glasgestaltung, Company, Germany	<p>Ladies and Gentlemen, i have to strongly oppose the proposed interdiction of lead in the EU. I am working as a stained glass artist and therefore with lead since 1965 now and have completed many restaurations and new projects with stained-glass windows in Germany. Many Churches and the Synagogues of the Cities Wuppertal, Duisburg and Düsseldorf show my work.</p> <p>If lead as an existential part of my work would not be available to me anymore, i can no longer sustain my business, nor can my son, who is getting ready to continue with my company in the future.</p>	Please see response to comment # 3585

		<p>The proposed ban of lead in the EU would not only be an economical disaster for me and my colleagues all over Europe, but also a great and irreplaceable loss for religious and architectural culture in our European Union.</p> <p>I am aware of the dangers for health concerning lead, but since I am a professional I take great awareness in minimizing the risks involved for my employees, customers and of course myself.</p> <p>with the best regards,</p> <p>Udo Unterrieser</p>	
		<a href="#">4700_Anschreiben Bleiverbot Helsinki.docx</a>	
4701 2022/05/02	GLR Rothkegel GmbH & Co. KG, Company, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4702 2022/05/02	Individual, France	<a href="#">4702_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4703 2022/05/02	Maison Arcanthe, Company, France	<a href="#">4703_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4704 2022/05/02	Rothkegel Glas & Licht GmbH, Company, Austria	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4705 2022/05/02	Atelier Mestdagh Bv, Company, Belgium	<p>I don't see the urgency for our stained glass sector! We are with so little in Europe. The ban on lead for our sector should not be a priority at all! It even shouldn't be a concern!</p> <p><a href="#">4705_Reaction against the proposed ban on lead_Atelier Mestdagh.docx</a></p>	Please see response to comment # 3585
4706 2022/05/02	Individual, Belgium	<a href="#">4706_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4707 2022/05/02	Individual, Germany	Dear Ladies & Gentlemen, My name is Keno Enstrup and i just finished my 4-year long vocational training as a glass painter and stained-glass artist. I always saw my future job in taking over my fathers company and to become an expert in restauration and the creation of new projects like he (and many other respected craftsmen and -women) all over europe is and are. With the upcoming proposal to ban lead and lead-containing products like tin for solder i am deeply concerned about my own economical future and the future of our european culture. <a href="#">4707 Anschreiben Bleiverbot Helsinki Keno.pdf</a>	Please see response to comment # 3585
4708 2022/05/02	Individual, Germany	Guten Tag! Ich sehe ein Bleiverbot in Munition als falsch an u. bitte um Korrektur!  Schrotkugeln aus Stahl, Zink, Zinn sind von geringerer Dichte und können Niederwild nicht wie Bleischrot in ausreichender Menge durchdringen, dafür aber schwer verletzen!  Bei Stahlschrot steigt die Verletzungsgefahr für Tiere u. Menschen durch Querschläger!  Alternativen (Eisen, Kupfer, Zink, Wolfram, Wismut) sind toxischer als Bleimunition! Wolfram, Wismut, beschichtetes Bleischrot geben fast keine Metallionen in Wasser ab, Kupfer und Zink aber bedenklich viel!  Viele Grüße,  Ulrich Kneuer	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4709 2022/05/02	Individual, Belgium	<a href="#">4709 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4710 2022/05/02	Atelier Yvo Vitro, Company, France	<a href="#">4710 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais-1.pdf</a>	Please see response to comment # 3862
4711	Nzilani Glass Conservation,		

2022/05/02	Company, United States of America	<a href="#">4711_ECHA_Lead_Ban.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4712 2022/05/02	Individual, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 4671
4713 2022/05/02	Individual, United States of America	<p>Request for a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage [REACH Annex XIV, EC number 231-100-4].</p> <p>Lead, cast, milled or extruded into lead profiles or strips; and glass paints containing lead, are an indispensable and intrinsic component in the manufacture and conservation of stained glass and stained glass. Lead profile is soldered at its intersections to form a strong and durable matrix that supports the colored and painted glass. This is an art form with a millenary history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris, Strasbourg (France), the cathedrals of Cologne, Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium), among many others.</p> <p>The malleability, strength and durability of lead over the centuries make its unique properties irreplaceable as an integral part of stained glass production. Without lead, the historic windows of our monuments and museums could not be restored, conserved and preserved. Lead is indispensable for the survival and maintenance of this unique art form.</p>	Please see response to comment # 3585

		<p>The toxicity of lead is well known and its health risks are effectively managed by stained glass designers, glass manufacturers and restorers around the world. Regular blood tests, the use of suction and appropriate personal protective equipment ensure that the many thousands of people who work in this profession do so safely and with minimal and well-controlled risks.</p> <p>We strongly urge the European Commission to exclude the use of lead in the manufacture and conservation of stained glass from its proposed ban. Such a ban would not only destroy the livelihoods of glass artists, craftsmen and restorers engaged in the care of Europe's heritage, but it would also affect the rest of the world and ultimately be the death sentence for one of the most glorious art forms known to mankind.</p>	
4714 2022/05/02	Wärtsilä Oyj Abp, Company, Finland	<p>Our company is providing innovative technologies and lifecycle solutions for the marine and energy markets and has legal entities in 18 EU countries. We are incorporating a variety of lead containing articles into large scale industrial products and installations (business-to-business, professional use) which have a long service life, from 30 to 50 years. These lead-containing articles are purchased from suppliers of which many are located in EU area. Many of the lead-containing articles which are incorporated into new build products, are also delivered to our customers as spare parts.</p> <p>Lead containing components (above 0.1 % w/w) are in use in different product portfolios listed here below</p> <p>Marine propulsion and power plant engines, generating sets and auxiliary systems (including exhaust treatment)</p> <ul style="list-style-type: none"> <li>· Different size of bearings, lead is acting as industrial lubricant</li> <li>· Pumps (e.g. fuel pump, oil pump, injection pump)</li> <li>· Bushes, seals and rings</li> <li>· Valves and nozzles</li> <li>· Gaskets</li> <li>· Filters</li> <li>· Electrical and automation units and their components</li> <li>· Sensors (e.g. pressure gauge, thermometer, manometer, tachometer, speed sensor)</li> <li>· Turbochargers</li> <li>· Alloying element in brasses and bronzes</li> <li>· Pins, screws, springs and nut</li> <li>· Gland box</li> <li>· Lead-based DC battery back-up systems</li> <li>· Electrical boards in selective Catalytic Reduction (SCR) systems</li> </ul>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b></p>

		<p>Marine propulsors, gears and shaft-line solutions</p> <ul style="list-style-type: none"> <li>· alloying element in brasses and bronzes</li> <li>· bearings, lead is acting as industrial lubricant</li> </ul> <p>Gas storage and handling systems</p> <ul style="list-style-type: none"> <li>· Gas flow indicator and transmitter</li> <li>· LNG flow indicator</li> <li>· temperature sensors and pressure indicators</li> <li>· instrument root valves</li> <li>· pneumatic cabinet component</li> <li>· lead-based industrial batteries in back-up systems</li> </ul> <p>Electrical systems</p> <ul style="list-style-type: none"> <li>· Gyro compasses (i.e. as a counter weight)</li> <li>· Lead-based industrial batteries and uninterruptible power supply systems</li> <li>· Use in solder, e.g., in the case of electrical and electronic equipment, as permitted under the RoHS Directive</li> </ul> <p>Our products are part of the critical infrastructure of society (energy infrastructure and marine logistics) with high criteria and requirements for safety and reliability. Their life expectancy is from 30 to 50 years, and our company is required to guarantee spare parts for these long service life products.</p> <p>Our products are intended to be installed, operated, maintained, repaired and remanufactured in a controlled industrial environment and this type of work is done by professionals with provided health and safety instructions. During these mentioned life cycle stages lead is not handled or melted in a chemical form and due to this we consider that the exposure to lead is minimal within these mentioned product life cycle stages. Our company also provides information to the customer considering lead containing components to enable proper and professional waste handling at the end of the life of the product.</p> <p>We are not recommending of including Lead in Annex XIV particularly considering the use for business-to-business large scale products and installations, and their components.</p>	
4716 2022/05/02	Individual, Belgium	<p><a href="#">4716 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment #



			4330
4717 2022/05/02	EURL CAMADE, Company, France	<a href="#">4717_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4718 2022/05/02	Drucken&Lernen Lehrmittelverlag, Company, Germany	Vom Verbot ausgenommen werden sollte Buchdruck mit Bleiletttern und die notwendigen Verfahren zur Herstellung von Lettern und Druckformen. Hierbei handelt es sich um ein historisches Druckverfahren, welches nach wie vor von Einzelpersonen, Institutionen und Museen erhalten wird. Ein Verbot von Blei bei diesem Verfahren würde die Demonstration und den Erhalt einer zentralen kulturhistorischen Technik, welche zum immateriellen Weltkulturerbe der UNESCO gehört, unmöglich machen. <a href="#">4718_Ausnahmeregelung_Bleisatz-ECHA.docx</a>	Please see response to comment # 4671
4719 2022/05/02	IMI Hydronic Engineering SA, International organisation, Switzerland	Attached the pdf file with IMI HE position <a href="#">4719_IMI_Hydronic_Engineering_position.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double</b>

			<p>regulation and ask for regulatory coherence A.2.08 BOEL more effective to address occupational exposure than Authorisation A.2.09 Need for a consistent regulatory framework between REACH and RoHS A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD A.2.13 Postpone inclusion in Annex XIV / withdraw recommendation until REACH revision is complete A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of</p>
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			<p>lead emissions over the last decades</p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p> <p><b>A.2.36 Attached COM questionnaire</b></p> <p><b>B.2.01. Request extra long LAD</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
4720 2022/05/02	Individual, France	<p>L'utilisation du plomb est essentielle dans la restauration du patrimoine architectural. Seul ce matériaux permet de réaliser des protections aux intempéries, de part sa malléabilité. Il s'adapte bien à tout type de forme et de support.</p> <p>Il est bien sur indispensable à la restauration des vitraux, permettant de relier les verres entre eux.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p>
4721 2022/05/02	Département de l'Aube, Regional or local authority, France	<p><a href="#">4721_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 3862
4722 2022/05/02	Individual, Belgium	Uses exempted from the authorisation requirement - Comments on uses (or categories of uses) that should be exempted, including reasons for that :	

		<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	Please see response to comment # 4330
		<a href="#">4722_pétition.docx</a>	
4723 2022/05/02	Individual, Germany	Absurder Plan ohne Folgenabschätzung: Sportschützen, Jäger und alle verbundenen Tätigkeiten (wirtschaftlich und privat) werden massiv beeinträchtigt, es gibt keine Folgeabschätzung für mögliche Ersatzmaterialien (Kupfer ist auch nicht unbedenklich). Ein plastisches Beispiel, warum die EU sich zum undemokratischen Koloss entwickelt hat, der ohne verfassungsmäßige Rechtfertigung massiv gleichschaltet und in das Leben der Bürger eingreift (von unseren Steuergeldern bezahlt).	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.34 Process of commenting not democratic, as too complex</b>
		<a href="#">4724_ECHA_(english)_comments_Kreil.pdf</a>	
4724 2022/05/02	Individual, Germany		Please see response to comment # 4554
4725 2022/05/02	Individual, Belgium	<a href="#">4725_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4726 2022/05/02	Individual, France	<a href="#">4726_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	

			Please see response to comment # 3862
4727 2022/05/02	Individual, Belgium	<a href="#">4727 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4728 2022/05/02	Individual, France	<p>Le travail du vitrail et du cristal sont des travaux d'art qui doivent perdurer. Plutôt que d'interdire l'usage du plomb, vous pouvez émettre une dérogation précisant les conditions de travail à mettre en place dans ces ateliers. Le toit de Notre Dame va être refait en plomb. Quand il faudra refaire ou réparer des vitraux de monuments classés le savoir faire sera perdu.</p> <p>En tant que possédant vitrail et produits en cristal je ne suis pas impactée par le danger du plomb en tant qu'utilisatrice. Donc mettez en place un groupe de travail avec les professionnels afin de définir les conditions, EPI, et moyens à mettre en place.</p> <p>Ceci implique que des sociétés de production d'extraction et de plomb soient maintenues en considérant la quantité minimale annuelle de plomb nécessaire pour la production de vitrail, de cristal et de réparation comme pour le tout de Notre Dame.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4729 2022/05/02	Individual, Germany	<p><a href="#">4729 Einspruch-Bleiverbot.docx</a></p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 3585
4730 2022/05/02	ATELIER VERSICOLORE, Company, Belgium	<a href="#">4730 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4731 2022/05/02	Individual, Belgium	<a href="#">4731 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf</a>	Please see response to comment # 4330
4732	Individual,		

2022/05/02	Belgium	<a href="#">4732 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4733 2022/05/02	Individual, Belgium	<a href="#">4733 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4734 2022/05/02	Individual, Belgium	<a href="#">4734 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4735 2022/05/02	Hans Sasserath GmbH&Co.KG, Company, Germany	<p>- Pb is technically essential and is needed for the control of many properties in Cu alloys</p> <p>- Pb is already regulated in all product markets known to us (e.g. drinking water, ELV, RoHS...) via corresponding restrictions (Annex XVII REACH and others). No further restriction is needed</p> <p>- The authorization for the production of Pb-containing alloys applies ONLY to European manufacturers.</p> <p>This would lead to DIRECT distortions of competition on the semi-finished product market as well as INDI-REACT distortions of competition for the end products</p> <p>Fittings</p> <p>Among the manufacturers of fittings, lead is used, for example, in the processing of brass alloys in foundries for the production of articles. The use of the substance lead in this industry is therefore limited to the industrial level (SU15) and there are no uses by craftsmen or consumers. Although other companies in the industry have somewhat different technical setups, suppliers of fittings generally have either remelting equipment, where standard brass alloys are remelted and cast into the final shape, or other processes, where brass is transformed from a standard shape into the complex shape of a fitting body. The quantities of lead in brass alloys differ from manufacturer to manufacturer. In view of the proposed registration data on manufactured and/or imported lead quantities (ECHA, 2021), the lead quantity, which is rather low for fittings and can therefore be assessed as negligible, is also an important factor for the possible future registration of lead applications.</p> <p>Drinking water regulations</p> <p>Potential migration into drinking water is well controlled by the recently revised Drinking Water Directive, which sets stricter safety limits for lead in drinking water. For lead, the revised directive introduces a stricter limit than that currently recommended by WHO. More importantly, substitution, whenever technically and economically feasible, is addressed in the revised Directive in Article 10.3(f). The revision now includes a review mechanism that will involve ECHA</p>	Please see response to comment # 4647

		<p>and RAC and is similar to the authorization process. ECHA is now involved in the process of establishing European positive lists of approved substances for the manufacture of materials that come into contact with drinking water.</p> <p>A review mechanism is provided whereby each entry on the positive lists is assigned an expiration date, so that companies wishing to maintain the use of a substance must submit a review request by the specified expiration date. The Risk Assessment Committee (RAC) reviews applications and issues opinions that allow the Commission to decide whether an entry should be maintained, modified or removed from the positive lists. The sanitation industry strictly adheres to these regulations to ensure the protection of its employees, consumers and the environment. To this end, national drinking water organizations such as KIWA in the Netherlands and DVGW in Germany regularly conduct product and production audits at sanitary companies.</p> <p>We believe that all of these elements should be considered in the prioritization process and that it is warranted to defer the recommendation for lead inclusion due to ongoing work on other regulatory processes.</p> <p><b>Lead emissions</b></p> <p>Potential emissions from the use of alloys are considered negligible, as the release is more likely to occur at the waste stage (Plomb et principaux composés, Ineris, 2015). However, our industry is strongly based on recycling and is in line with the objectives of the circular economy. This prevents uncontrolled release of lead, as products reaching the end of their life return to the production cycle, where environmental releases are fully controlled by the Industrial Emissions Directive, currently under revision as part of the European Green Deal. In addition, lead emissions from industrial use in the EU have declined dramatically in recent decades. According to the International Lead Association (ILA) and data from the European Pollutant Release and Transfer Register (E-PRTR), lead emissions to air have decreased by 88% and emissions to water by 80% between 2007 and 2020.</p> <p><b>Worker exposure</b></p> <p>Worker exposure is controlled by occupational safety laws, which are also under review:</p> <ul style="list-style-type: none"> <li>o The Chemical Agents Directive (CAD - Chemicals Agents Directive), which is currently being revised in line with the European Pillar of Social Rights Action Plan and the OSH Strategic Framework for 2021-2027, which have set ambitious targets to further protect workers from workplace risks and with occupational health and safety, with the aim of achieving a zero approach to work-related fatalities in the EU.</li> <li>o The recently amended Carcinogens and Mutagens Directive (CMD), which sets limits for inorganic lead and its compounds, as well as biological limits and health surveillance measures that will strengthen the protection of workers from possible exposure to lead.</li> </ul> <p>We also note that the next draft amendment to Annex XIV is currently under preparation. (<a href="https://ec.europa.eu/info/law/better-regulation/haveyour-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en">https://ec.europa.eu/info/law/better-regulation/haveyour-say/initiatives/13092-Chemicals-REACH-regulation-amendment-to-the-list-of-substances-of-very-high-concern-in-Annex-XIV_en</a>)</p>	
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		It addresses seven lead compounds for which the Commission considers it appropriate to postpone its decision due to the ongoing review of CAD.	
4736 2022/05/02	Individual, France	Le plomb est dangereux, les médicaments aussi. Envisage-t-on d'interdire les médicaments ? non !	Thank you for your opinion.
4737 2022/05/02	Klassik Stiftung Weimar, Other contributor, Germany	<a href="#">4737_20220428_Antrag_Ausnahme_Blei_in_der_Dmpf_02.pdf</a>	Please see response to comment # 3585
4738 2022/05/02	Freiburger Münsterbauverein e.V., Other contributor, Germany	<a href="#">4738_Bleiverwendung_EU.pdf</a>	Please see response to comment # 3585
4740 2022/05/02	Individual, France	<a href="#">4740_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4741 2022/05/02	Individual, France	Je suis architecte spécialisé dans la restauration de bâtiments du patrimoine Français et notamment de nombreuses églises. Les vitraux sont des œuvres d'art qui ne peuvent disparaître et qui doivent être restaurées suivant des règles d'art bien précises. Les restaurateurs de vitraux suivent des protocoles bien définis dans l'usage du plomb qui ne permettent pas d'atteindre les consommateurs.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4743 2022/05/02	Rueil vitrail, Company, France	<a href="#">4743_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4745 2022/05/02	SARL Vitrail Saint Jean l'Art-Elie, Company, France	<a href="#">4745_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862



4746 2022/05/02	Senate, Other contributor, France	<a href="#">4746_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4747 2022/05/02	Individual, Belgium	<a href="#">4747 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4748 2022/05/02	Individual, Belgium	<a href="#">4748 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4750 2022/05/02	Glasmalerei Peters GmbH, Company, Germany	Ceramic color, including lead is essential part for the creation and restoration of glass windows. <a href="#">4750 Blei.docx</a>	Please see response to comment # 3585
4751 2022/05/02	Individual, Germany	Sonderregelungen für historische Sammlungen	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>
4753 2022/05/02	Individual, Germany	Museums, restorers of historical objects and museum objects in general should be exempted to make sure that public access to art and other cultural heritage is not impeded.	<b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b> <b>C.2.04. Exemption request for Scientific research e.g. in universities, public institutions</b>
4754 2022/05/02	Individual, Belgium	<a href="#">4754 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	

			Please see response to comment # 4330
4755 2022/05/02	Individual, Australia	I request a waiver from the proposed EU regulation on the use of lead, which would prevent stained glass artists and conservators/restorers in the field from practicing their profession and thereby threaten the future of our stained glass lead heritage	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4757 2022/05/02	Oras Oy, Company, Finland	see attachment <a href="#">4757_Lead to Reach sosioeconomic statement Oras 2022-04-29.pdf</a>	Please see response to comment # 4647
4758 2022/05/02	Individual, Germany	<a href="#">4758_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt.pdf</a>	Please see response to comment # 4554
4760 2022/05/02	Fabrique d'église Sainte-Waudru, Other contributor, Belgium	<a href="#">4760 Enquête UE - Plomb - Hiérarchisation des priorités - Waudru.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.36 Attached COM questionnaire</b>
4761 2022/05/02	Individual, Belgium	<a href="#">4761 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4762 2022/05/02	Individual, France	I'm stained glass curator and creator, I had need to practice my job and my work.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>

4765 2022/05/02	Individual, France	<a href="#">4765_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4766 2022/05/02	Individual, Belgium	<a href="#">4766 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4768 2022/05/02	Individual, Belgium	<a href="#">4768 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4770 2022/05/02	Individual, Belgium	<a href="#">4770 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4771 2022/05/02	Zentralverband des Deutschen Handwerks, Other contributor, Germany	See file attached <a href="#">4771_2022-04-28_ZDH-Stellungnahme REACH_EN.docx</a>	Please see response to comment # 4554
4772 2022/05/02	Römisch-Germanisches Zentralmuseum, Academic institution, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 4554
4773 2022/05/02	ABB Oy, Company, Finland	Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.  Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service nor recycling phase of End Product.  Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.  For more details refer to document attached in "Confidential Attachment to comments on ECHA's	Please see response to comment # 4239

		draft recommendation"	
		<i>Confidential attachment removed</i>	
4774 2022/05/02	Domschatz Essen, Company, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4775 2022/05/02	ANCIENS ETABLISSEMENTS GRIGNARD SPRL, Company, Belgium	<p>1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers.</p> <p>2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners.</p> <p>3. Exposure to lead for professionals is already strictly controlled, as implementation of appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p> <p><a href="#">4775 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330
4776 2022/05/02	Keramikmuseum Westerwald, Academic institution, Germany	<p>An die European Chemicals Agency (ECHA) P.O. Box 400 FI - 00121 Helsinki Finland</p> <p>Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser immaterielles Kulturerbe und das freie, künstlerische Töpferhandwerk</p> <p>Sehr geehrte Damen und Herren,</p> <p>Blei ist ein noch immer häufiger Bestandteil in keramischen Glasuren. Glasuren wiederum</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished</b></p>

		<p>schützen zum einen poröse Keramikoberflächen vor Feuchtigkeit und Beanspruchungen, zum anderen sind sie ein wesentlicher Aspekt künstlerischen Schaffens.</p> <p>Mit Ausnahme von Sinterware – Steinzeug und Porzellan – müssen bei niedriger gebrannten Temperaturen keramische Waren, wie Irdenware, Majolika, Fayence oder Steingut, vor dem Eindringen von Flüssigkeiten mittels eines Glasurüberzugs geschützt werden. Das betrifft nahezu die gesamte Haushalts- und Gebrauchskeramik. Schon in Ägypten und Mesopotamien wurden daher in der Vorgeschichte keramische Oberflächen mittels Glasuren versiegelt. In Mitteleuropa werden ab dem 13. Jahrhundert erste Gefäße mit einer Glasur überzogen, zunächst nur außen und damit nur wegen der Optik und als Zierde. Zum Ende des Mittelalters war Gebrauchsgeschirr üblicherweise innen glasiert, um den Verschleiß zu verhindern.</p> <p>Durch verschiedene Beimischungen wurden optische Effekte erreicht. Dazu gehört auch Blei, mit dem ein besonderer Farbglanz erzielt wird. Die Problematik von Bleiglasuren in Verbindung mit säurehaltigen Lebensmitteln erkannte man nicht. Dennoch besteht diese Gefahr nicht bei säurefreien Nahrungsmitteln, weshalb noch heute Bleiglasuren zum Einsatz kommen.</p> <p>Besonders bei der Diskussion zu beachten ist auch der künstlerische Aspekt. In der freien Entfaltung muss es gewährleistet bleiben, dass Künstler:innen mit den heute unbedenklichen Glasurmischungen weiterhin arbeiten können. Ihnen allen ist der Umgang damit bestens bekannt. Die Firmen, die heute Glasuren herstellen, haben nicht nur gut aufgeklärt, sondern auch Mischungen entwickelt, die heute bei fachgerechtem Umgang unbedenklich sind. Gebrannte keramische Kunstobjekte sind tatsächlich völlig ungefährlich, lediglich säurehaltige Lebensmittel sollten nicht in ihnen über einen längeren Zeitraum gelagert werden.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Keramiken von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Töpfereien und Kunsthandwerkern in ganz Europa vernichten, sondern auch die Nutzung und Präsentation dieser Objekte in Museen und im Haushalt erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der ältesten und vielfältigsten Kunsthandwerksformen Europas bedeuten.</p> <p><a href="#">4776_Protestbrief wegen Bleiverbot1.docx</a></p>	<p><b>articles or historic artefacts</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4777 2022/05/02	Fachgruppe der Freilichtmuseen im Deutschen Museumsbund, Academic institution, Germany	<p><a href="#">4777_FG Freilichtmuseen_Bleifenster.pdf</a></p>	Please see response to comment # 3585
4778 2022/05/02	Keramikmuseum Westerwald,	An Ms. Mariya Gabriel	

	Academic institution, Germany	<p>Directorate-General for Education and Culture European Commission 1049 Bruxelles / Brussel Belgium</p> <p>Betrifft: Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] Gefahr für unser immaterielles Kulturerbe und das freie, künstlerische Töpferhandwerk</p> <p>Sehr geehrte Frau Mariya Gabriel,</p> <p>Blei ist ein noch immer häufiger Bestandteil in keramischen Glasuren. Glasuren wiederum schützen zum einen poröse Keramikoberflächen vor Feuchtigkeit und Beanspruchungen, zum anderen sind sie ein wesentlicher Aspekt künstlerischen Schaffens.</p> <p>Mit Ausnahme von Sinterware – Steinzeug und Porzellan – müssen bei niedriger gebrannten Temperaturen keramische Waren, wie Irdenware, Majolika, Fayence oder Steingut, vor dem Eindringen von Flüssigkeiten mittels eines Glasurüberzugs geschützt werden. Das betrifft nahezu die gesamte Haushalts- und Gebrauchskeramik. Schon in Ägypten und Mesopotamien wurden daher in der Vorgeschichte keramische Oberflächen mittels Glasuren versiegelt. In Mitteleuropa werden ab dem 13. Jahrhundert erste Gefäße mit einer Glasur überzogen, zunächst nur außen und damit nur wegen der Optik und als Zierde. Zum Ende des Mittelalters war Gebrauchsgeschirr üblicherweise innen glasiert, um den Verschleiß zu verhindern.</p> <p>Durch verschiedene Beimischungen wurden optische Effekte erreicht. Dazu gehört auch Blei, mit dem ein besonderer Farbglanz erzielt wird. Die Problematik von Bleiglasuren in Verbindung mit säurehaltigen Lebensmitteln erkannte man nicht. Dennoch besteht diese Gefahr nicht bei säurefreien Nahrungsmitteln, weshalb noch heute Bleiglasuren zum Einsatz kommen.</p> <p>Besonders bei der Diskussion zu beachten ist auch der künstlerische Aspekt. In der freien Entfaltung muss es gewährleistet bleiben, dass Künstler:innen mit den heute unbedenklichen Glasurmischungen weiterhin arbeiten können. Ihnen allen ist der Umgang damit bestens bekannt. Die Firmen, die heute Glasuren herstellen, haben nicht nur gut aufgeklärt, sondern auch Mischungen entwickelt, die heute bei fachgerechtem Umgang unbedenklich sind. Gebrannte keramische Kunstobjekte sind tatsächlich völlig ungefährlich, lediglich säurehaltige Lebensmittel sollten nicht in ihnen über einen längeren Zeitraum gelagert werden.</p>	Please see response to comment # 4776
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		Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Keramiken von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Töpfereien und Kunsthandwerkern in ganz Europa vernichten, sondern auch die Nutzung und Präsentation dieser Objekte in Museen und im Haushalt erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der ältesten und vielfältigsten Kunsthandwerksformen Europas bedeuten. <a href="#">4778_Protestbrief wegen Bleiverbot2.docx</a>	
4779 2022/05/02	EVVA Sicherheitstechnologie GmbH, Company, Austria	(1) Lead (Pb) is already a restricted substance under REACH Annex XVII Entry 63. This offers sufficient possibilities for further restricting and reducing the use of lead. Hence, including lead in REACH Annex XIV is not required. (2) The Commission should postpone the inclusion of further substances, especially lead (Pb), in REACH Annex XIV until the revision of the REACH Regulation is concluded in order to avoid legal uncertainty.	<b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4780 2022/05/02	Individual, France	<a href="#">4780_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4781 2022/05/02	Individual, France	<a href="#">4781_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4782 2022/05/02	Individual, France	<a href="#">4782_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4783 2022/05/02	Individual, France	<a href="#">4783_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4784	Atelier Simon-Marg,		

2022/05/02	Company, France	<a href="#">4784_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4785 2022/05/02	Future for Religious Heritage (FRH), International NGO, Belgium	<a href="#">4785_FRH_ECHA's plan to include lead in the list of substances subject to authorisation.pdf</a>	Please see response to comment # 3585
4786 2022/05/02	Individual, United Kingdom	<a href="#">4786_EN Sample letter stained glass and lead template letter.docx</a>	Please see response to comment # 3585
4787 2022/05/02	Individual, France	<a href="#">4787_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4788 2022/05/02	Individual, France	<a href="#">4788_2022.04.25. - CNSV - R--ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4789 2022/05/02	Wirtschaftskammer Österreich (WKÖ), Other contributor, Austria	see attachment <a href="#">4789_su_343_Stellungnahme_Priorisierung_Anh_XIV_Blei.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.1.5.7. Potential competitive disadvantage</b>



			<p><b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.09 Need for a consistent regulatory framework between REACH and RoHS</b></p> <p><b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.23 Authorisation requirement for production of spare</b></p>
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			<p><b>parts and repair of existing articles</b>  <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b>  <b>A.2.28 Administrative and financial burden of the AfA requirement for small actors / SMEs</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4790 2022/05/02	Bevaring Sjøælland, Company, Denmark	<p><a href="#">4790 ECHA's plan to include lead in the list of substances subject to authorization.pdf</a></p>	Please see response to comment # 3740
4791 2022/05/02	ABB Oy, Company, Finland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.</p> <p>For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"</p> <p><i>Confidential attachment removed</i></p>	Please see response to comment # 4239
4792 2022/05/02	Individual, France	<p><a href="#">4792 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862

4793 2022/05/02	Neue Sächsische Galerie Chemnitz, Other contributor, Germany	<a href="#">4793 Blei-Ausnahmereglung-Brief-NSG ECHA.pdf</a>	Please see response to comment # 4554
4795 2022/05/02	MINERAL CREATION, Company, France	<a href="#">4795_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4796 2022/05/02	Ceemet - European Tech and Industry Employers , Industry or trade association, Belgium	<p>Ceemet has concerns regarding the proposed uptake of Lead in the REACH authorisation regime. The inclusion of Lead in the REACH authorisation process would undoubtedly damage growth, reduce competitiveness and hinder the transition to a low carbon economy. Furthermore, Lead plays a fundamental role in the ability to deliver on key EU policy objectives such as the European Green Deal.</p> <p>Lead, or products made of alloys containing Lead, are to be found widely in our industries. For example taps, brazing processes in electronics, glass, paint stabilisers and soldering to name but a few. Lead is a substance widely used in many of the sub sectors of the MET industries such as automotive, defence, railway, space, aeronautics, electrical and the electronic or mechanical industries. Additional sectors concerned would be automotive subcontractors, connector manufacturers and soldering gun manufacturers. In the context of the European Union's ecological transition, in particular for the electrification of the car fleet and the development of the digitalisation of the economy, Lead is today indispensable for batteries and electronic components.</p> <p>As a large number of companies use Lead or alloys containing Lead, the introduction of Lead in Annex XIV would lead many companies to have to prepare applications for authorisation. In addition, the use of Lead is also governed by other legislation. It is regulated concerning restrictions on the use of Lead in certain products (Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS); Directive 2012/19/EU on waste electrical and electronic equipment (WEEE); Directive 2001/95/EC on general product safety; Directive 94/62/EC on packaging and packaging waste; Directive 2000/53/EC on end-of-life vehicles (ELV); Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC) as well as the protection of the environment (Directive 2010/75/EC on industrial emissions (integrated pollution prevention and control); Directive 2000/60/EC establishing a framework for Community action in the field of water policy (Water Framework Directive); Directive 2008/98/EC on waste (Waste Framework Directive)) and the protection of workers (Directive 98/24/EC on the protection of the health and safety of workers from the risks related to chemical agents at work).</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.1. Potential other regulatory actions</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance</b>  <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b>  <b>A.2.18 Essential role of lead metal for Green</b></p>

		<p>Exemptions to the ban on the use of Lead have been provided for, respectively, in Annexes II and III of the ELV and Annexes III and IV of the RoHS Directives. A SVHC information must be given to downstream users as soon as the Lead concentration exceeds 0.1% by mass and a notification of Lead has to be reported in the SCIP database when its concentration in articles (products) exceeds the above-mentioned threshold. From the many notifications of lead in articles from the MET industries in the SCIP database, the necessity of lead in many crucial technical sectors can be deduced.</p> <p>Therefore, for the European MET industries, subjecting Lead to authorisation would lead to:</p> <ol style="list-style-type: none"> <li>1. The end of certain industrial processes which currently have no known substitute processes;</li> <li>2. Industry not having enough time to adapt due to too short a transition time;</li> <li>3. A risk of company closures and job losses with major consequences, even though these sectors are crucial to the long-term economic recovery of the European Union;</li> <li>4. The aggravation of massive job losses directly linked to environmental regulations in connection with the "Fit for 55" programme.</li> </ol> <p>Subjecting Lead to authorisation in REACH Annex XIV is disproportionate to the risk posed. This is due to the fact that the management of this risk is sufficiently dealt with by multiple directives relating to the placing on the market of products and OSH legislation. Furthermore, when a company adheres to an OEL this would constitute an exemption according to Art. 58(2).</p> <p>Moreover, it would not have the desired effect. Instead of encouraging the search for alternatives, which do not currently exist, it will adversely affect our industrial fabric and skills base, which could be relocated where regulations are more pragmatic. In fact, the authorisation of a substance covers its manufacture and use, but it does not prohibit the import of articles containing it into the European Union.</p> <p>We therefore advocate that Lead should not be made subject to authorisation and we recommend that the European Commission work with industry on pragmatic measures adapted to the issues at stake.</p>	<p><b>Deal and circular economy</b>  <b>B.2.01. Request extra long LAD</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
4797 2022/05/02	Meissen Porzellan-Stiftung GmbH, Company, Germany	<a href="#">4797_ECHA 2.5.2022.pdf</a>	Please see response to comment # 4554
4798 2022/05/02	SFG / APSV Schweizerischer Fachverband für Glasmalerei	<a href="#">4798_Stellungnahme EU Verbot von Blei European Chemicals Agency.pdf</a>	

	/ Association professionnelle suisse du vitrail, Industry or trade association, Switzerland		Please see response to comment # 3585
4799 2022/05/02	Hitachi Energy Czech Republic s.r.o., Company, Czech Republic	The comments are given for the Electronic Industry mainly for the High Power Semiconductors industry used for Railway, Energy Power Systems, Wind-Off-Shore, Automotive etc. There is a broad usage of lead in many areas (solder process, alloys etc.) and most often we judge those applications as "essential use" of lead as it is related to very long term reliability requirements. <a href="#">4799_Position-paper-Pb-metal-Authorisation-final_web.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3856
4800 2022/05/02	Individual, France	<a href="#">4800_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais - Copie.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4801 2022/05/02	Individual, France	<a href="#">4801_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais - Copie.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4802 2022/05/02	Individual, France	<a href="#">4802_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais - Copie.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4803 2022/05/02	Individual, France	<a href="#">4803_GURNEL -ECHA .pdf</a>	Please see response to comment # 3740
4804 2022/05/02	Individual, France	<a href="#">4804_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4805 2022/05/02	Individual, France	<a href="#">4805_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais - Copie.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment #

			3862
4806 2022/05/02	Atelier DADA LUMIERE, Company, France	<a href="#">4806_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4807 2022/05/02	SFG / APSV Schweizerischer Fachverband für Glasmalerei / Association professionnelle suisse du vitrail, Industry or trade association, Switzerland	<a href="#">4807_Stellungnahme EU Verbot von Blei European Chemicals Agency.docx</a>	Please see response to comment # 3585
4808 2022/05/02	Stiftung Werkstattmuseum für Druckkunst, Other contributor, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 4554
4809 2022/05/02	Individual, France	<a href="#">4809_GURNEL F - ECHA.pdf</a>	Please see response to comment # 3740
4810 2022/05/02	Individual, France	<a href="#">4810_GURNEL C - ECHA.pdf</a>	Please see response to comment # 3740
4811 2022/05/02	Office of the President of the Czech Republic, Department for Heritage Care, National Authority, Czech Republic	Sender: Department for Heritage Care, Office of the President of the Republic, Prague Castle, First Courtyard, 119 08 Prague 1 – Hrad, Czech Republic  20 April 2022  Addressee: The European Chemical Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finland  Subject: Request for an exception on the use of lead in the preservation of art and monuments,	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio- economic benefits of continued use</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished</b>

		<p>based on the proposed EU regulation [supplement XIV, REACH regulation, No. ES 231-100-4].</p> <p>To whom it may concern,</p> <p>With deep concern, we have learned that the ECHA is planning to include lead in the list of toxic substances and to become subject to special permission. In this letter, we would like to express our concern about the consequences for the maintenance, restoration and conservation of historical monuments. For centuries, lead has been the traditional material applied in large buildings, such as the Cathedral of St Vitus, where it was used as roof cover, waterproof insulation, insulation of other metal building parts and exposed joints, as material in the bearing structure of the stained-glass windows of the cathedral. Traditional technological approaches and materials are still being applied in the course of the renovation of historical monuments. The area of Prague Castle is a 'National Cultural Monument' (in terms of Czech legislation) and at the same time inscribed in the UNESCO List of World Heritage Properties. Therefore we are bound by UNESCO conventions in the heritage care of cultural monuments. Excluding the use of lead, we would have to break the rules for the application of traditional approaches. Our experience from the systematic heritage care of St Vitus' Cathedral at Prague Castle in the last decades has shown that lead as a building material is irreplaceable. Its formability, stability and durability cannot be achieved by using another, even if modern material.</p> <p>We are aware that working with lead requires strict measures to minimize health hazards for all craftsmen, conservators and artisans coming into contact with this toxic material.</p> <p>We, therefore, ask the European Chemical Agency (ECHA) and the European Commission to remove the use of lead in the field of the preservation, conservation, renovation and presentation of historical building monuments and artistic and cultural properties.</p> <p>We believe that the above-mentioned arguments will be considered before deciding on this matter.</p> <p>PhDr. Petr Kroupa Director Department for Heritage Care Office of the President of the Republic</p>	<p><b>articles or historic artefacts</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.08 Exempt use in art and building sector</b></p>
4812 2022/05/02	Individual, Belgium	<p><a href="#">4811_zakova_220502-113344-445.pdf</a></p> <p><a href="#">4812_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	<p>Please see response to comment # 4330</p>
4813	Individual,		

2022/05/02	Belgium	<a href="#">4813 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf</a>	Please see response to comment # 4330
4814 2022/05/02	Naturkundemuseum Leipzig, Regional or local authority, Germany	<p>Bitte um Ausnahmeregelung für die Verwendung von Blei sowie die Bewahrung und Präsentation von bleihaltigem Kulturgut, insbesondere für die Arbeit von Kulturerbe erhaltenden Einrichtungen wie Museen sowie Restaurierung und Denkmalpflege bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4]</p> <p>Sehr geehrte Damen und Herren, Blei ist Bestandteil von Kunst- und Kulturgut fast aller Epochen und Gattungen, insbesondere des technikhistorischen Kulturguts. Ohne Blei hätte es keinen Buchdruck gegeben. Einzigartige mechanische Eigenschaften von Blei werden in Legierungen – Zinn, Messing und Stahl inbegriffen – genutzt, viele Metallobjekte sind bleihaltig. Historische Farbmittel, etwa das bis zu seinem Verbot 1989 in Malerei und Skulpturenfassung omnipräsente Bleiweiß enthalten es. Bei den faszinierenden Glasmalereien in mittelalterlichen Kirchen und vielen historischen Fenstern unserer Denkmale ist Blei konstruktiv unverzichtbar. Historische Korrosionsanstriche, Emailen, Keramikglasuren und Kristallglas enthalten Blei. Auch Museen zeigen Kunst-, Natur- und Kulturgüter mit einem Gehalt an Blei. Sie bewahren diese Objekte und sind neben der Erforschung für deren Erhaltung verantwortlich. Sie haben Umgang mit diesem Gefahrstoff und beauftragen Restauratoren mit der Entwicklung, Planung und Durchführung von Maßnahmen für deren Erhalt. Sie achten darauf, dass Museumsgäste keinen Schaden nehmen bei der Betrachtung der Objekte. Ohne Blei können zudem wichtige Konservierungs- und Restaurierungsarbeiten in den Museen und der Denkmalpflege nicht mehr ausgeführt werden. Darüber hinaus ist dieses Material für den Fortbestand des Wissens um historische Techniken und für deren Rekonstruktionen unverzichtbar. Die Toxizität von Blei-(verbindungen) ist bekannt und seine Gesundheitsrisiken werden von Restauratoren und Museumsfachleuten professionell gehandhabt. Die Verwendung von Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests im Rahmen ausformulierter Betriebsanweisungen sorgen für einen kontrollierten Umgang mit dem Gefahrstoff und minimieren das gesundheitliche Risiko.</p> <p>Die Gefährdung von Kleinkindern kann ausgeschlossen werden, da in der Regel bei der musealen Präsentation ein Berührungsverbot und ein Abstandsgebot gilt bzw. die Objekte unzugänglich in Vitrinen präsentiert werden.</p>	Please see response to comment # 4554



		Wir, die Mitarbeiterinnen und Mitarbeiter des Naturkundemuseums Leipzig, fordern die ECHA und die Europäische Kommission geschlossen nachdrücklich dazu auf, die Verwendung von Blei bei der Konservierung, Erhaltung, Transport sowie der Präsentation von Kunst- und Kulturgut von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde den Erhalt und die Präsentation dieser Werke in Museen, Archiven, Sammlungen, Kirchen und öffentlichen Gebäuden erschweren. Mit der Konsequenz, dass bedeutendes Kulturerbe der Öffentlichkeit nicht mehr zugänglich ist. Das Metall und seine Verbindungen sind, wenn auch nur in Spuren, in derartig vielen Sammlungsobjekten vorhanden, dass die Kulturlandschaft Europas (Museen, Denkmäler) insgesamt betroffen ist. <a href="#">4814_22_05_02 Statement Naturkundemuseum Leipzig ECHA Finland.pdf</a>	
4815 2022/05/02	Individual, France	<a href="#">4815_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4818 2022/05/02	Individual, Germany	<a href="#">4818 Oliver Schach 202205023 Einspruch an ECHA.pdf</a>	Please see response to comment # 4554
4819 2022/05/02	Individual, France	Bonjour, je souhaite vous interpeller afin de protéger les métiers d'art exercés en France qui pourraient être menacés par les réglementations sur le plomb. En tant qu'émailleur d'art sur métaux, je suis inquiète de voir mon métier (classé au Patrimoine culturel immatériel de l'Unesco) disparaître. Je vous remercie de votre attention, Cordialement	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4820 2022/05/02	Vineta-Museum der Stadt Barth, Other contributor, Germany	<a href="#">4820_VinetaM.pdf</a>	Please see response to comment # 4554
4821 2022/05/02	Hitachi Energy Czech Republic s.r.o., Company, Czech Republic	This is a redundant comment as I wrongly enter my former request as marco.renggli@ch.abb.com which is obsolete. Please ignore / delete my former comments. The comments are given for the Electronic Industry mainly for the High Power Semiconductors industry used for Railway, Energy Power Systems, Wind-Off-Shore, Automotive etc. There is a broad usage of lead in many areas (solder process, alloys etc.) and most often we judge those applications as "essential use" of lead as it is related to very long term reliability requirements. <a href="#">4821_Position-paper-Pb-metal-Authorisation-final_web.pdf</a> <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>

			<p>A.1.5.5. Availability of suitable alternatives A.1.5.6. Socio-economic benefits of continued use A.1.5.7. Potential competitive disadvantage A.2.01 Questioning the way other Regulatory Risk management activities have been considered when prioritising the substance A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence A.2.08 BOEL more effective to address occupational exposure than Authorisation A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation A.2.17 Main lead emissions result nowadays from uses</p>
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			<p>outside scope of authorisation / drastic decrease of lead emissions over the last decades</p> <p><b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p> <p><b>A.2.31 The role of SCIP in reducing the amount of lead in articles should be considered</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
4822 2022/05/02	Förderverein Kulturgüter Wasserburg Divitz e.V., Other contributor, Germany	<a href="#">4822_Divitz.pdf</a>	Please see response to comment # 4554
4823 2022/05/02	Individual, France	<a href="#">4823_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4824 2022/05/02	Städtische Museen Großenhain, Regional or local authority,	<a href="#">4824_Brief Ausnahmeregelung für die Verwendung von Blei_22-05-02.docx</a>	

	Germany		Please see response to comment # 4554
4825 2022/05/02	Historische Kommission für Pommern e.V., Other contributor, Germany	<a href="#">4825_Hiko.pdf</a>	Please see response to comment # 4554
4826 2022/05/02	Hungarian Blackpowder Shooters and Hunters Association, National NGO, Hungary	<p>Dear Madam/Sir,</p> <p>On behalf of the Hungarian Blackpowder Shooters and Hunters Association we are submitting the following report on including lead in Annex XIV of the REACH regulation.</p> <p>Any further regulation of lead is unacceptable. All the arguments we submitted for the consultation of Annex XVII are valid for Annex XIV as well. The sad happenings of today caused by the aggression of Russia in Ukraine raised the question from a health and environmental level to strategic defence and security levels.</p> <p>Risks of further regulation of lead</p> <p>Understanding the critical situation EU member states face today due to the Russian aggression in Ukraine, we consider any further regulations of using lead for manufacturing ammunition both for military, law enforcement and civil purposes a direct threat on both defence and security and security of food supply chain.</p> <ol style="list-style-type: none"> <li>1. Any further regulation of lead used for manufacturing ammunition or in any areas of civil industry producing products for military, law enforcement and civil purposes is considered a direct threat of reducing the productivity of critical infrastructure serving the defence and security sector or both Hungary and all other EU member states. Ammunition is manufactured in plants producing goods both for civil and military use. Any further regulation of the civil manufacture or use of lead bullets can drastically reduce the production capacities serving the military and law enforcement.</li> <li>2. A full ban on use of lead for manufacturing ammunition forces the industry to a manufacturing technology change with such short term, the industry will not be able to follow. We do not see any indication of plans for covering the cost of such transitions or covering the loss generated by losing the pay-off possibility of previous investments in lead bullet manufacturing machinery and procedures.</li> <li>3. Due to the insecurity of ammunition manufacturing within the EU, the industry will be willing to relocate the production capacities outside the geographical coverage of the REACH regulations, resulting loss of jobs, loss of tax revenues within the EU, while drastically reducing the potentials of the European defence industry.</li> <li>4. Any further regulation of lead as material for bullets for hunting will have a strong effect on the food supply chain security. Based on previous statistics, in case of a total ban on using lead projectiles for hunting 25% of the hunters will quit hunting, while the remaining hunters will hunt 30% less. This will necessarily increase the amount of damage caused by the game in the</li> </ol>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.7. Potential competitive disadvantage</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p>

		<p>agriculture and forestry. (<a href="https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/">https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/</a>) In the light of the Ukrainian-Russian conflict, the importance of the security of the food supply chain became an increasingly important strategic question for all EU member states.</p> <p>5. Including lead in the Annex XIV of the REACH regulation will ban using lead bullets for the law enforcement organizations of the EU member states, as only defence purposes can be considered as exceptions according Article 2 3.: “Member States may allow for exemptions from this Regulation in specific cases for certain substances, on their own, in a preparation or in an article, where necessary in the interests of defence.”</p> <p>6. Inclusion of lead in Annex XIV shall have an effect of manufacturing batteries as vast majority of lead (84% in 2015) is used for this purpose. In light of the Ukrainian-Russian conflict the strategic importance of devices storing energy increased drastically.</p> <p>7. Inclusion of lead in Annex XIV shall nearly automatically render vast majority of firearms designed for lead bullets unserviceable, it will raise safety concerns in case of shotguns designed for lead shot, it will reduce accuracy of firearms and airguns used for target shooting and will reduce the effectivity of hunting rifles designed for lead core bullets.</p> <p>8. All Olympic and most ISSF international shooting events require lead bullets/shots to be competitive. After the ban no EU athletes can participate such events abroad, and no international competitions can be held in EU countries.</p> <p>9. All historical muzzleloaders and their replicas are safe only with lead bullets both for target shooting and hunting purpose. As there are millions of muzzleloader guns (mostly unregulated) in the hands of European citizens, it is potentially hazardous to force them to use alternative bullet materials. The lead ban also terminates the sport shooting and hunting with these guns.</p> <p>Our proposals</p> <p>1. In light of the current defence and security situation faced by the EU member states due to the Russian aggression in Ukraine we are against any further regulation of lead by including it in Annex XIV.</p> <p>2. We find it necessary to interrupt the procedure of any further regulation of lead under Annex XVII and Annex XIV.</p> <p>3. It is essential to apply exclusion from the regulations of Annex XIV for manufacturing and using lead and lead core bullets to save the ammunition manufacturing capacity serving the defence and public security/law enforcement sector, and to maintain hunting at a level required to reduce damage to agricultural lands and forestry.</p> <p>Balázs Németh, PhD member of the board of HBSHA, defence and security advisor, doctor of military sciences Hungarian Blackpowder Shooters and Hunters Association HUNGARY, 1044 Budapest, Kalvin Janos u. 35.</p>	<p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b></p> <p><b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p> <p><b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b></p>
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		<a href="#">4826_ECHA letter 20220502.docx</a>	
4827 2022/05/02	Individual, France	<a href="#">4827_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4828 2022/05/02	Joh. Pengg AG, Company, Austria	Due to the automatic scoring system, we understand that lead is evaluated by ECHA. On the other hand, lead is already very well regulated in Europe i.e. REACH XVII, RoHS, ELV, EU OEL, IED 2010, Water and Air Regulations (also in National Regulations). Therefore, an inclusion in Annex XIV Reach is for us as an Ferrous Metals Processing Industry and Surfacetreatment Industry not an appropriated measure.	<b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>
4829 2022/05/02	The Stained Glass Museum, Other contributor, United Kingdom	Appeal for Derogation in Respect of proposed EU Regulations on the Use of Lead which would prevent stained glass artists and stained glass conservators from practicing their profession and thereby pose a threat to the future of our Stained Glass Patrimony [REACH Annex XIV, EC Number 231-100-4] <a href="#">4829_ECHA.pdf</a>	Please see response to comment # 3585
4830 2022/05/02	Individual, Belgium	<a href="#">4830 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4831 2022/05/02	Megin oy, Company, Finland	None <a href="#">4831_KH0220518ENN.en.pdf</a>	
4832 2022/05/02	Germany, Member State	In general we support the idea to regulate lead and lead compounds to eliminate sources by which environment and humans are exposed. From our experience, for the application for authorisation, industry usually scrutinizes and improves its risk reduction measures. Additionally, requirements implemented when granting the authorisation also improve the protection levels of workers. However, lead has a complex set of regulations already in place. Therefore, we would like you to consider overlaps and contradictions of an authorisation duty with restrictions under REACH and other existing regulations like the battery directive, ROHS, and OSH (adaptation of BOELV and new implementation of BLV). Especially recycling issues may be considered. It should be checked, if derogations following Art 58 (2) are necessary	<b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>

			<b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b>
4833 2022/05/02	Museum Schloss Wolkenstein, Other contributor, Germany	<a href="#">4833_Kommentar.pdf</a>	Please see response to comment # 4554
4834 2022/05/02	Individual, Belgium	<a href="#">4834 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4835 2022/05/02	Staatliche Kunstsammlungen Dresden, Regional or local authority, Germany	<a href="#">4835_20220502125404127.pdf</a>	Please see response to comment # 4554
4836 2022/05/02	IGMNiR, Industry or trade association, Poland	<a href="#">4836_IGMNiR - recom com call for info questionnaire en.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b> <b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b> <b>A.2.24 Applicability of the authorisation</b>

			<p>requirement for recycling or recovered materials</p> <p><b>A.2.36 Attached COM questionnaire</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.02 Request for exemption under Art. 58(2) based on the future Batteries Regulation</b></p>
4837 2022/05/02	Individual, Belgium	<a href="#">4837 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4838 2022/05/02	Bittium Corporation , Company, Finland	<i>Confidential attachment removed</i>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b></p> <p><b>B.1.2.2. Lack of alternatives, socio-economic aspects</b></p> <p><b>C.1 Process information</b></p> <p><b>C.1.1. General principles for exemptions under Art. 58(2)</b></p>



			<b>C.1.2. Generic exemptions</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b> <b>C.2.06 Exemption request for uses in medical devices</b> <b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b>
4839 2022/05/02	Individual, Germany	<a href="#">4839_20220502121312 Blei 1.pdf</a>	Please see response to comment # 4554
4840 2022/05/02	Individual, France	<a href="#">4840_contribuer_consultation.pdf</a>	Please see response to comment # 3805
4841 2022/05/02	ATELIER VITRAIL "PAJ", Company, France	<i>Confidential attachment removed</i>	<b>B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates</b> <b>B.1.2.2. Lack of alternatives, socio-economic aspects</b>
4842 2022/05/02	Individual, Luxembourg	no substute for muzzle loader and historic firearms bo substute fir rimfire abd air pellets which reaches lead accuracy	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b>

			<b>A.1.5.5. Availability of suitable alternatives</b>
4843 2022/05/02	Individual, Belgium	<a href="#">4843 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4844 2022/05/02	Individual, Belgium	<a href="#">4844 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf</a>	Please see response to comment # 4330
4845 2022/05/02	COCIR, Industry or trade association, Belgium	COCIR submits the comments on behalf of the companies/business associations listed in the document attached to this consultation, participants in the RoHS Umbrella Industry Project  <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b> <b>A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation</b> <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>

			<p><b>A.2.23 Authorisation requirement for production of spare parts and repair of existing articles</b>  <b>A.2.32 Difficulties to meet normative requirements under Ecolabel and/or other standards if lead is included in Annex XIV</b>  <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p>Please see response to comment # 3856</p>
4846 2022/05/02	Technology Industries of Finland, Industry or trade association, Finland	<p>The list mentioned below is meant to illustrate the numerous uses of lead and show a list of various lead-containing component types. Yet, it shall not be considered as an exhaustive list of uses.</p> <p>Lead is used e.g. in batteries, connectors, transistors, thyristors, varistors, diodes, capacitors, power semiconductors, resistors, transducers, measuring transformers, soldering, plate parts, bearing guards, seals, circuit boards, screws, washers, parts of fans, gaskets, steel tubes and steel in general, certain electrical control parts: contactors, motor circuit breakers, on-delay contact blocks, key switches, limit switches, emergency stop switches, indicating lights, relays, surge arresters, adapters, antennas, mobile control systems; brass cages of bearings, reducers, plugs; aluminium housings, valve bodys; coupling shafts in hook blocks, brackets; nuts and bolts; pumps, bushes and rings, nozzles, filters, sensors, turbochargers, alloying element in brasses and bronzes, pins and screws, gland box, springs, lead-based antifriction in bearing shell, indicators and transmitters, gyro compasses etc.</p> <p>Lead is widely used in various products and the need for authorisation for the use of lead would cause major challenges in product design, manufacturing and maintenance due to the very poor availability of lead-free parts and components. Currently, there are no alternatives at all for numerous lead containing components. Therefore, we strongly recommend not to include lead in REACH Annex XIV.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.1. Potential other regulatory actions</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.6. Socio-economic benefits of continued use</b>  <b>A.1.5.7. Potential competitive disadvantage</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double</b></p>

		<p>Including lead metal in REACH Annex XIV would impede the delivery of EU policy objectives for a strategically autonomous, sustainable and carbon-neutral future. It is not a proportionate measure given the effective regulatory framework already in place. The inclusion of lead metal in the REACH authorisation process would damage growth, reduce competitiveness and hinder the transition to a low carbon economy.</p> <p>Instead of including lead metal in REACH Annex XIV, we propose that the EU:</p> <ol style="list-style-type: none"> <li>1. Recognises the social and economic benefits of a key raw material that is essential for many value chains including battery production and associated industries that support low carbon objectives and electrification across the EU. The carrier metal properties of lead are a key enabler of the circular economy by allowing recovery a wide range of critical and essential raw materials, including those that are key to e-mobility, digitalisation and the energy transition.</li> <li>2. Works with industry to identify more effective and proportionate measures to address any uses of lead metal which the EU believes present a residual risk not already addressed through the already existing comprehensive and effective framework of lead-specific EU legislation that has delivered significant reductions in lead exposures.</li> <li>3. Considers targeted REACH Restrictions if specific activities or products are identified where there remains an unacceptable risk arising from exposure to lead, not already addressed through existing measures, and that are identified as contributing most to environmental and/or human exposures.</li> <li>4. Understands the complexity of many lead-using value chains across the EU, which would result in very high volumes of applications for authorisation, including from many SMEs, if lead metal were included in REACH Annex XIV. This would require significant resources from both regulators and industry and would not be a proportionate method of reducing risks to human health and the environment.</li> </ol>	<p><b>regulation and ask for regulatory coherence</b>  <b>A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead</b>  <b>A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation</b>  <b>A.2.18 Essential role of lead metal for Green Deal and circular economy</b></p>
4847 2022/05/02	Individual, Germany	<p>By banning lead, you, as a European organization, do not achieve any improvement in environmental conditions, but you harm a wide field of industry and trade. Furthermore, in both hunting and sport shooting, damage that can never be repaired is inflicted, which will cause protests throughout Europe in the affected places.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.4. Control of risks</b></p>

			<b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4848 2022/05/02	FIVA - Fédération Internationale des Véhicules Anciens, International NGO, France	<a href="#">4848_Letter to ECHA.pdf</a>	Please see response to comment # 3833
4849 2022/05/02	L'Amande et L'Obsidienne, Company, France	<p>Nous utilisons le plomb pour fabriquer des vitraux.</p> <p>Les plus anciennes traces de vitrail retrouvées datent du Ve siècle, la plus ancienne pièce de verre peint retrouvée date du IXe siècle. La cathédrale de Chartres est connue pour ses vitraux du XIIe siècle et la cathédrale de Bayeux s'est récemment parée de nouvelles verrières contemporaines réalisés avec exactement la même technique. La fabrication des vitraux n'a pas changé depuis le moyen-âge, tout est encore fabriqué artisanalement. Chaque panneau étant unique dessiné et fabriqué sur mesure pour l'emplacement auquel il est destiné. Chaque verrière peut être composée de plusieurs panneaux de vitrail.</p> <p>Les vitraux sont constitués d'une multitude de morceaux de verres teintés dans la masse, aux formes variées en fonction du dessin du vitrail. Ces morceaux de verre sont assemblés entre eux avec des profilés en plomb en forme de H (photo 1) que nous achetons sous forme baguettes à des fabricants spécialisés. Le plomb n'est pas coulé entre les verres, c'est un assemblage mécanique, pièce à pièce qui se tient uniquement par des points de soudure à l'étain (montage en cours, photo 2). Les points de soudures sont réalisés uniquement aux intersections des baguettes de plomb. La différence de hauteur entre l'épaisseur du verre (1,5 à 4 mm) et la hauteur du plomb (5mm) permet de réaliser les soudures, suffisamment loin du verre pour lui éviter la casse par choc thermique, le temps des quelques secondes qu'il faut à l'étain pour fondre (alliage 60%étain/40% plomb). (Photo 3)</p> <p>Il peut suffire d'une demi heure pour souder un vitrail qu'on aura mis 15 heures à assembler. Pour épouser les formes biscornues des verres, les profilés en plomb n'ont pas besoin d'être chauffés, ils sont simplement formés à la main sur les pièces de verre ce qui nous permet une grande précision de mise en forme et d'assemblage. Chaque vitrail ayant un dessin unique, chaque plomb est formé au fur et à mesure, sur chaque pièce de verre. (Photo 4)</p> <p>La définition du passage des plombs (que l'on appelle « chemin de plomb »), de l'arrêt d'une baguette pour en laisser passer une autre (photo 5), demande un savoir-faire particulier pour le lire dans la coupe des pièces de verre lors de la restauration de vitraux anciens car le chemin de plomb se définit dès la coupe des gabarits des verres (étape qu'on appelle « calibrage »). Les pièces de verre sont calibrées les unes par rapport aux autres en en déduisant exactement</p>	Please see response to comment # 3585

		<p>l'espace que le profilé en plomb prendra entre chacune d'elle. (Photo 6)</p> <p>Les profils en plomb qui passent entre les verres se coupent au couteau, au raz des verres pour laisser passer le profil suivant. Cette capacité du plomb à être coupé au couteau permet une grande précision car si on laisse quelques dixièmes de millimètres en trop, multipliés par le grand nombre de verres, on fini avec quelques centimètres en trop sur la taille initiale du vitrail qui ne rentrera plus dans la fenêtre à laquelle il est destiné.</p> <p>La malléabilité du plomb permet aussi de réaliser des assemblages dits « en chef d'oeuvre » que l'on retrouve très régulièrement dans les vitraux du XIXe siècle mais aussi dès le XVIe siècle (vitraux de l'église Sainte Jeanne d'arc de Rouen ou les triomphe de Petrarques présentés à la cité du vitrail de Troyes par exemple) Le principe de la « mise en chef d'oeuvre » est d'inclure une pièce de verre, entièrement dans une autre, une étoile de verre blanc dans une pièce de ciel en verre bleu par exemple, et sans section dans le verre bleu pour accéder au verre blanc de l'étoile. Pour cela, la réserve est créée à la coupe dans le verre bleu, comprenant la taille de l'étoile + la place de l'âme du plomb. On place le plomb tout autour de l'étoile et on relève à la verticale l'aile du plomb qui doit laisser passer le verre bleu. Une fois les deux pièces assemblées, l'aile du plomb est rabattue avec précaution sur la pièce bleue pour que l'étoile soit bien maintenue comme l'ensemble des autres pièces dans le vitrail. C'est une opération toujours délicate car les pièces « à trou » sont toujours très fragiles, il ne faut exercer aucune pression dessus au risque de les casser. C'est la souplesse du plomb qui nous permet de réaliser de tels assemblages. ( voir schéma)</p> <p>Chaque étape de la conception d'un vitrail demande un savoir-faire spécifique et l'ensemble nécessite beaucoup de temps et de patience.</p> <p>Le verre est un matériau fragile, sensible à la mise en tension et aux chocs thermiques. Le plomb est un matériau particulièrement ductile, qui se soude à basse température et qui résiste bien dans le temps, aux intempéries et ce, sans varier son volume.</p> <p>Un vitrail assemblé en plomb neuf tiendra ainsi, sans nécessité d'intervention, en moyenne un siècle.</p> <p>Les propriétés ductiles du plomb permet à l'assemblage que constitue un vitrail de toujours garder une certaine souplesse. Ainsi, lorsque le vent souffle, c'est l'ensemble du vitrail qui bouge, les contraintes ne sont pas absorbées uniquement par les verres, mais la résille de plomb les accompagne dans ce mouvement ce qui protège les verres de la casse, tel le chêne et le roseau dans la fable de La Fontaine. Quand on dépose un vitrail, c'est au moment où on le sort de son emplacement que l'on se rend compte de la force du courant d'air qui s'engouffre et des contraintes auxquelles le vitrail est réellement soumis au quotidien.</p> <p>Nous n'avons aujourd'hui aucun substitut au plomb qui présente toutes ces caractéristiques permettant le sertissage des verres, et leur protection tout au long de la longue vie d'un vitrail.</p>	
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4850	Glasmuseum Weißwasser,		

2022/05/02	Regional or local authority, Germany	<a href="#">4850_img306.pdf</a>	Please see response to comment # 4554
4851 2022/05/02	Landschaftsverband Westfalen-Lippe, Regional or local authority, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 4554
4852 2022/05/02	Museum Hagenow, Other contributor, Germany	<a href="#">4852_Comments on the draft recommendation of substances for inclusion in Annex XIV.pdf</a>	Please see response to comment # 4554
4853 2022/05/02	Individual, France	<a href="#">4853_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4854 2022/05/02	Individual, France	<a href="#">4854_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4855 2022/05/02	Individual, France	<a href="#">4855_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4856 2022/05/02	Individual, France	<a href="#">4856_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4857 2022/05/02	Individual, France	<a href="#">4857_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4858	Individual,		



2022/05/02	France	<a href="#">4858_2022.04.25. - CNSV - Rf@ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4859 2022/05/02	Individual, Belgium	<a href="#">4859 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4860 2022/05/02	Rijksdienst voor het Cultureel Erfgoed, National Authority, Netherlands	<a href="#">4860_20220502 Akk handtek SL Mr S. O Mally ECHA ref 1270237.pdf</a>	Please see response to comment # 3740
4861 2022/05/02	Deutsches Nationalkomitee für Denkmalschutz / German National Committee for Monument Preservation , National Authority, Germany	<p>The Inclusion of the material lead in Appendix XIV (Authorisation List) of the REACH Regulation without exemption would not only pose a major threat to the conservation, maintenance, presentation and even the creation of a large number of art and cultural objects, but would also affect the livelihoods of countless conservators-restorers, craftsmen, artists and specialised traders in building materials. The consequences would be an economic, cultural and social impoverishment on a massive scale.</p> <p>Areas of Europe-wide application are primarily</p> <ul style="list-style-type: none"> <li>• organ building: production of new and repair of existing pipes</li> <li>• the classical stonemasonry trade: sealing joints by grouting with lead, grouting embedded steel anchors, covering connecting surfaces</li> <li>• the roofing and tinsmithing trades in the repair or re-roofing of historic roofs</li> <li>• the restoration of historic glass windows or the production of new coloured glass windows</li> <li>• the use of lead-containing materials in ceramic glazes and paints</li> <li>• artistic printing techniques and book artists who continue to work in classical letterpress techniques</li> <li>• conservation of a wide range of cultural goods containing lead in museums and heritage institutions</li> </ul> <p>All attempts in recent decades to replace lead with less hazardous substances in monument conservation and restoration have failed. Two examples:</p> <ul style="list-style-type: none"> <li>• On components of large churches exposed to water, snow, wind abrasion and freeze-thaw cycles, there is no mineral building material that protects joints, stone connections and steel anchors better and more durably than lead. Synthetics are prohibited because of their short lifespan and negative effects on the historic materials.</li> <li>• Lead is an indispensable and intrinsic component in the fabrication and conservation of stained</li> </ul>	Please see response to comment # 3740

		<p>glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. Lead's malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture.</p> <p>The use of lead is therefore without alternative in monument conservation, restoration, arts and crafts for certain areas of application.</p> <p>The toxicity of lead is well-understood and its risks to health are very effectively managed by stained glass designers and fabricators, by stone masons, organbuilders, conservators all over the world. Regular blood testing, use of extraction system with appropriate micro-filtration and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk. This is also the case for heritage professionals in the other sectors mentioned above.</p> <p>Users of lead in the field of restoration, arts and crafts and visual arts are above all small businesses of craftsmen, restorers, producers and traders of building materials or artists. Today, they and their skills are themselves worthy of protection in the sense of intangible cultural heritage. Any further complication in the procurement, storage and use of this indispensable material lead endangers the work and, in the long term, the continued existence of these specialised, intrinsically motivated specialists. This is not to say that the highest safety standards do not have to apply to lead processing, as they do now.</p> <p>The total amount of lead used in the above-mentioned areas is comparatively small. But if artisans and artists are prevented from working for cultural heritage by ban-like high hurdles, this has a significant impact on a large amount of existing and future cultural assets. Objectives must therefore be at least:</p> <ul style="list-style-type: none"> <li>• to obtain exemption clauses for users of lead in arts and crafts as well as restoration and repair of historic buildings and their furnishings,</li> <li>• to obtain exemption clauses for producers and traders of lead for the purposes mentioned.</li> </ul> <p>We strongly urge the ECHA and the European Commission to grant exceptions for the use of lead in the fabrication, conservation and restoration of cultural goods without without restricted admission. There is a need for an official and permanent exemption for the use and handling of lead in cultural heritage sectors.</p>	
4862 2022/05/02	Sächsisches Industriemuseum Energiefabrik Knappenrode, Academic institution,	<p><a href="#">4861_ECHA_Reach_App._XIV_Lead_Stellungnahme_Konsultation.pdf</a></p> <p><a href="#">4862_Blei-Ausnahmereglung-Brief-Vorlage_ECHA.docx</a></p>	Please see response to comment #

	Germany		4554
4863 2022/05/02	Norwegian Armed Forces / Maintenance Horten, Other contributor, Norway	No comment	
4864 2022/05/02	Individual, Hungary	<p>Dear Sir/Madam,</p> <p>The planned lead ban is a direct political attack against the many millions of European gun owners. You will find an air gun in practically every second(!) household in Europe.</p> <p>There is no alternative for lead-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting.</p> <p>The overall effect of the metallic lead bullets on the environment is negligible, close to zero. The social and economical impact is totally unproportional.</p> <p>The purpose of this ban is to de facto ban civilian gun ownership in the EU, on the grounds of the popular topic of environmental protection.</p> <p>You all are abusing the followings:  1. most EU citizens do not even know about this draft;  2. most EU citizens cannot even comment on this issue with professional arguments;  3. today, environmental protection is a popular topic that can be used to gain the support of the masses of non-expert citizens for anything.</p> <p>I will fight against this ban and will never comply.</p> <p>Best regards,  Robert Jakab</p>	Please see response to comment # 4153
4865 2022/05/02	Individual, France	<p><a href="#">4865_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>  Confidential attachment removed</p>	Please see response to comment # 3862
4868 2022/05/02	Staatliche Ethnographische Sammlungen Sachsen (Teil der SKD), Other contributor,	<p><a href="#">4868_Erbitte Ausnahmeregelung.pdf</a></p>	Please see response to comment #

	Germany		4554
4869 2022/05/02	Individual, Belgium	<a href="#">4869_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4870 2022/05/02	Individual, Belgium	Very concerned that the proposed regulations would have a severe impact on the Stained Glass workshops and craftspeople who work on stained glass creation and repair. This is an important and beautiful part of the European patrimony and should be considered as an exemption within your wider regulations, which I support. <a href="#">4870_Save Stained Glass in Europe - CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4871 2022/05/02	Individual, France	<a href="#">4871 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4872 2022/05/02	Individual, France	<a href="#">4872_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4873 2022/05/02	Individual, France	<a href="#">4873_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4874 2022/05/02	Natur-Museum Goldberg, Regional or local authority, Germany	<a href="#">4874_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt.pdf</a>	Please see response to comment # 4554
4876 2022/05/02	Individual, France	<a href="#">4876_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4877 2022/05/02	Individual, Germany	<a href="#">4877_Ausnahmegenehmigung .pdf</a> <i>Confidential attachment removed</i>	

			Please see response to comment # 3585
4878 2022/05/02	Individual, France	<a href="#">4878_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4879 2022/05/02	Individual, Belgium	<a href="#">4879 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4880 2022/05/02	Individual, France	<a href="#">4880_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4881 2022/05/02	Ernst Barlach Stiftung, Other contributor, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 4554
4882 2022/05/02	Individual, Portugal	I think its is a big mistake to ban lead from ammunicions becuse it will cause a drastic reduction on fire arms for defense, right now that europe has so many defense problems, and because the electric batteries are responsible for the majority of lead use. It will cause defense problems and also desemployment issues as EU industry os not capable to replace the lead from the ammunicions, first from the high price of ir, and also because many guns can not use alternatives	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>C.2.07 Exemption for uses necessary in the interests of defence/military uses</b>
4883 2022/05/02	Dombauhütte Aachen, Other contributor, Germany	<a href="#">4883_Ausnahmeregelung für die Verwendung von Blei in der Kunst und Denkmalpflege, Dombauhuette Aachen V1.pdf</a>	Please see response to comment # 3585

4884 2022/05/02	Individual, Germany	<a href="#">4884_EU-Bleiverbot.pdf</a>	Please see response to comment # 3585
4885 2022/05/02	Individual, Germany	<a href="#">4885_Ausnahmeregelung_Bleisatz-ECHA.docx</a>	Please see response to comment # 4671
4886 2022/05/02	Zentralverband des deutschen Dachdeckerhandwerks e.V., Industry or trade association, Germany	<p>Lead in the roofing trade</p> <p>Lead is used as a material (product) for roofing, wall coverings, connections, maintenance joints, monument protection and as a lead-containing solder (mixture) for soft soldering. The material lead has accompanied the roofing trade for a very long time in history and is still often used today due to its many good properties. Its corrosion resistance and easy formability are properties that make lead a very common material for connecting and terminating building components. Lead is also highly weather-resistant and low-maintenance. This makes the proven material irreplaceable for the protection of historical monuments. Connection joints in hard-to-reach building components, such as church towers, can be executed almost maintenance-free with caulked lead wool in order to protect the building as long-lasting and sustainably as possible.</p> <p>Another large area of application is the use of solders containing lead. These are used to solder zinc and copper sheets, which in turn are processed into covers, roofing, façade cladding or even gutters and rainwater pipes.</p> <p><a href="#">4886_202200502_Comments_ZVDH.pdf</a></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p>
4887 2022/05/02	Deutsches Museum von Meisterwerken der Naturwissenschaft und Technik, Other contributor, Germany	<a href="#">4887_Letter to ECHA_Deutsches Musuem.pdf</a>	Please see response to comment # 4554
4888 2022/05/02	ABB Oy, Company, Finland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End</p>	Please see response to comment # 4239

		<p>Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.</p> <p>For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation".</p>	
		<i>Confidential attachment removed</i>	
4889 2022/05/02	Normandie Vitrail, Company, France	<a href="#">4889_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4890 2022/05/02	Individual, France	<a href="#">4890_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4891 2022/05/02	Germany, Member State	<p>STIFTUNG PREUSSISCHE SCHLÖSSER UND GÄRTEN Postfach 601462 14414 Potsdam</p> <p>European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finland</p> <p>ABTEILUNG RESTAURIERUNG Ansprechpartner U. Köhler Durchwahl +49 (0)331.9 69 4-806 Telefax +49 (0)331.9 69 4-802 E-Mail u.koehler@spsg.de</p> <p>Ihre Nachricht vom Ihre Zeichen Datum 28.04.2022</p>	Please see response to comment # 4554

Bitte um Ausnahmeregelung für die Verwendung von Blei an Kunst- und Kulturgut, bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4]

Sehr geehrte Damen und Herren,  
das Material Blei ist Bestandteil von Kunst- und Kulturgut fast aller Epochen und Gattungen, insbesondere des Technischen Kulturguts, kunsthandwerklicher Objekte, Metallskulpturen, Musikinstrumenten, historischen Gebäuden, archäologischen Objekten oder Glasmalerei.

Als Restaurator:innen in der Stiftung Preußische Schlösser und Gärten Berlin-Brandenburg setzen wir uns für die Erhaltung und Pflege des uns anvertrauten Erbes ein. Historische Zimmer-Rohbauten, Einrichtungsgegenstände und Kunstwerke enthalten Blei. Die Risikobewertung erfolgt im kontinuierlichen Monitoring auf der Grundlage eines fundierten Wissens zu den Gefährdungen durch Bleiverbindungen. Darauf abgestimmt Maßnahmen erreichen eine unbedenkliche Bearbeitung, Nutzung und Präsentation.

Das wichtigste Weißpigment vor dem 20. Jahrhundert, fast das einzige wegen seiner nützlichen Eigenschaften, war Bleiweiß. Es ist praktisch in jedem älteren Gemälde zu finden.

Als Gemälderestaurator:innen können wir sagen, dass der sichere Umgang mit Gemälden seit langem etabliert ist. Für Restaurierungen, Rekonstruktionen und Kopien im Rahmen der maltechnischen Forschung muss die Verwendung von bleihaltigen Pigmenten unter professionellen Arbeitsbedingungen möglich bleiben.

Blei findet sich auch in historischen Möbeln, beispielsweise als Bleigewichte für Mechaniken in Schreibräumen/Sekretären, als Bestandteil von Fassungen auf hochwertigen Lackmöbeln sowie in Fassungen fast sämtlicher weiß gefasster Möbel 16. -20. Jahrhunderts. Zusätzlich können Möbel mit in Modellen gepressten Bleiornamenten dekoriert sein. Blei wird in Tasteninstrumenten für die Beschwerung von Springern, die dem Tonanschlag dienen, verwendet. Bei Baudenkmalen bestehen Gegengewichte an Schiebefenstern und Stege an Fenstergläsern oftmals aus Blei.

Bei der Restaurierung und mit der Entscheidung zur Kopie oder Rekonstruktion von Bleiornamenten-/Bleigewichten oder Wiederspielbarmachung von Tasteninstrumenten besteht der Anspruch der Werk- und Materialtreue. Die Anwendung historischer Techniken sind untrennbarer Teil des Erhaltung dieser Kunst- und Kulturgüter.

In der Steinrestaurierung ist Blei ein essentieller Bestandteil. Blei wird seit Jahrtausenden als Vergussmörtel für komplexe Bauteile und bei Verankerungen genutzt. Die historischen Beispiele für Bleiverguss sind an jedem Schloss oder Sakralbau seit der Antike belegt. Ist diese fachgerecht ausgeführt, übernehmen die Technik des Bleivergusses noch heute ihre Funktion



		<p>und muss nicht saniert werden. Blei ist witterungsbeständig und passt sich auf Grund seiner plastischen Verformbarkeit dem Druck und der Oberfläche an. Daraus ergibt sich der entscheidende Vorteil bei der Verwendung mit Naturstein, einem Material mit geringer Biegezugfestigkeit. Ob als Fugenmaterial (verstemmte Bleiwolle), als Unterlagen (Bleiplatten und-plättchen) oder im Verguss (konisch angelegte Verankerungen) verweist Blei seit über 2000 Jahren auf seine Vorzüge gegenüber anderen Versetzmaterialien. Die Vorteile des Materials ist für die Steinrestaurierung mannigfaltig und muss weiterhin anwendbar bleiben.</p> <p>Ohne Blei können wichtige Bereiche der Konservierung-Restaurierung in unseren Museen und der Denkmalpflege nicht ausgeführt werden. Darüber hinaus ist dieses Material für den Fortbestand des Wissens um historische Techniken und für deren Rekonstruktionen in allen Fachbereichen unverzichtbar.</p> <p>Die Toxizität von Blei und seinen Korrosionsprodukten ist sehr gut bekannt und seine Gesundheitsrisiken werden in der Branche professionell gehandhabt. Die Verwendung von geeigneter persönlicher Schutzausrüstung (PSA), Absauganlagen, und regelmäßige Bluttests im Rahmen ausformulierter Betriebsanweisungen sorgen für einen kontrollierten Umgang mit dem Gefahrstoff.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei im Zusammenhang mit Kunst- und Kulturgut von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Erhalt und die Präsentation dieser Werke in Museen, Archiven, Sammlungen, Kirchen und öffentlichen Gebäuden be- und verhindern, sondern auch die Arbeitsweise von Restaurator:innen, die für den Erhalt unseres bedeutenden Kulturerbes in Europa tätig sind.</p> <p>Mit freundlichen Grüßen</p> <p>- im Auftrag - Dipl. Rest. Undine Köhler</p> <p>Abteilung Restaurierung FB Präventive Konservierung</p>	
4893 2022/05/02	Individual, Belgium	<p><a href="#">4893 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a></p>	Please see response to comment # 4330

4894 2022/05/02	Individual, France	<a href="#">4894_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4895 2022/05/02	Individual, France	<a href="#">4895_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4897 2022/05/02	Individual, France	<a href="#">4897_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4898 2022/05/02	la Fondation du Patrimoine, Regional or local authority, France	<a href="#">4898_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4900 2022/05/02	IMI Hydronic Engineering AB, Company, Sweden	<p>IMI Hydronic Engineering AB has over 10,000 items in its portfolio, majority is brass products for the drinking water application and heating and cooling. We have developed our own dezincification resistant brass that are well known and optimized for our applications. The product we are manufacturing are die casted, machined from rod or hot stamped. All of our brass products contain lead as a lubricant when the products is machined. Thanks to the lead content the lifetime for the machines is extended, lowering the carbon dioxide impact and decreasing the quantity of cutting fluid.</p> <p>The products placed on the market by IMI Hydronic Engineering AB are already covered by various legislations, these existing regulations will automatically reduce the amount of lead. The reduction of lead in brass is moving forward, e.g.:</p> <ul style="list-style-type: none"> <li>Ü the drinking water directive is decreasing the limits of lead leakage,</li> <li>Ü the demand to registration in the SCIP-database (0,1 %)</li> <li>Ü in Sweden we also have demands from the market as Byggvarubedömningen (0,1 %).</li> </ul> <p>Today about 90 % of the brass material that are used in the Swedish industries are recycled but unfortunately there is no commercial method to purify the brass material from lead. Recycling is key to be able to withhold the sustainability within the market of brass. We recycle between supplier and manufacturer and within our own factory.</p> <p>The climate change is an issue for us all. Putting "old" brass to waste and mine more pure copper is not a sustainable solution for brass. Manufacturing brass from virgin raw materials</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b></p>

		<p>creates an 8.4 times larger climate footprint compared recycling. Furthermore, many manufacturers have chosen suppliers that are located locally to make sure that the transportation of the material is kept to a minimum, banning lead would increase the carbon footprint due to longer transportation of virgin material.</p> <p>Since the drinking water directive is under re-evaluation, putting lead on the authorization list would create double legislation. The limit of lead emissions in water is halved in the new drinking water directive which will already create a tough challenge for manufacturers, however within a reasonable time limit. To have legislation that are limiting both the lead content and the lead emissions is not a productive way to move forward.</p> <p>The risks that we are facing are:</p> <ul style="list-style-type: none"> <li>Ü Brass can't be purified from lead in a way that are technically and economically acceptable.</li> <li>Ü The brass industry is an industry that lives on recycling – something we can't continue if lead is banned</li> <li>Ü The cost will go up – both for the raw material, but also for the production of new products due to the need to use more expensive tools for machining and the tool wear will be bigger.</li> <li>Ü The carbon footprint will increase if lead is banned since we need to use more virgin copper</li> <li>Ü There is a great risk that products in new material will have to meet the markets before the alloys are completely investigated and that the products won't have the same corrosion resistance/lifetime as the previous</li> <li>Ü The decision would force companies to relocate outside the EU and cause job losses inside the EU.</li> <li>Ü If the change is too fast in new material – a lot of Manufacturers (including IMI) will have to close down</li> </ul> <p>IMI Hydronic Engineering therefore requests that the use of lead as an alloy in its metallic form, not be included in Annex XIV of the REACH Regulation. We believe all these factors combined should be considered and postponing the recommendation for lead based on ongoing regulatory processes is justified.</p>	<p><b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD</b></p> <p><b>A.2.17 Main lead emissions result nowadays from uses outside scope of authorisation / drastic decrease of lead emissions over the last decades</b></p> <p><b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b></p>
4901 2022/05/02	Vitrocentre and Vitromusée Romont, Other contributor, Switzerland	<p><a href="#">4901 ECHA Lead Statement VMR VCR 20220502.pdf</a> <i>Confidential attachment removed</i></p>	Please see response to comment # 3862
4902 2022/05/02	Sächsische Landesstelle für Museumswesen, Regional or local authority, Germany	<p><a href="#">4902 2022-05-02 Blei-Ausnahmeregelung ECHA.pdf</a></p>	Please see response to comment # 4554

4903 2022/05/02	ABB Oy, Company, Finland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling.</p> <p>For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"</p>	Please see response to comment # 4239
		<i>Confidential attachment removed</i>	
4904 2022/05/02	Dachdecker - Fachinnung Westeifel, Company, Germany	<p>Bitte um Erhalt von Blei - Walzblei in der Dachwelt. Unverzichtbar für den Denkmalschutz, kulturelles Erbe und die damit verbundenen Arbeitsplätze.</p> <p><a href="#">4904_Bedenken_Bleiverbot.docx</a></p>	Please see response to comment # 3585
4905 2022/05/02	Royal Institute of Architects of Ireland (RIAI), Industry or trade association, Ireland	<p><a href="#">4905_220315_DRAFT_Lttr_HBC_ECHA_Public_Consult_v2.0_29_Apr_2022.pdf</a></p>	<p><b>A.1.1.5. New information and next steps towards the final recommendation</b></p> <p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.1.5.8. Uncertainty as to whether</b></p>

			<p><b>authorisation will be granted</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p>
4906 2022/05/02	GDKE Rheinland-Pfalz, Direktion Landesarchäologie, Regional or local authority, Germany	<i>Confidential attachment removed</i>	Please see response to comment # 3585
4907 2022/05/02	C. DUBON Créations Verre, Company, France	<a href="#">4907_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
4908 2022/05/02	Individual, France	<a href="#">4908_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4909 2022/05/02	Individual, Germany	<a href="#">4909_Musterbrief_zur_freien_Verwendung_Aenderung.pdf</a>	Please see response to comment # 3585
4910 2022/05/02	BDMP, International organisation, Germany	As an internationally successful sports shooting association with partners around the world and many world championship titles in handgun and rifle/shotgun shooting, we hereby bring to your notice that the lack of alternatives means that our sport would be dead if lead were to be included in the Authorisation list. Unfortunately, there are no viable alternatives, especially in handgun shooting, and any alternative would enormously degrade precision. The result would be that all non-European competitors were still able to use lead and international competition	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p>

		<p>would no longer be feasible for us. The restriction proposed for Annex XV stated that quite clearly.</p> <p>But most important of all is to be aware of the facts: Shooting ranges in Germany are sustainable because we already recycle our lead. We protect the environment as well as our-selves from any danger that is correlated with lead. We recycle our lead - it stays in the cycle of reusable materials.</p> <p>In this paper, we comment at first on the relevant parts for sports shooting concerning the Annex XV report that refers to the inclusion of lead in the Authorisation list as well. If there are questions regarding our point of view, please feel free to contact us.</p>	<p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.2.24 Applicability of the authorisation requirement for recycling or recovered materials</b>  <b>A.2.35 Comment on Annex XV restriction dossier</b></p>
		<p><a href="#">4910 BDMP ECHA ANNEX XIV Endfassung.pdf</a></p>	
4911 2022/05/02	Individual, France	<p><a href="#">4911_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4912 2022/05/02	Individual, France	<p><a href="#">4912_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
4913 2022/05/02	Signode Sweden AB, Company, Sweden	<p><a href="#">4913 ECHA - Comments on the draft recommendation for lead 220427.pdf</a></p>	<p><b>A.1.1.5. New information and next steps towards the final recommendation</b>  <b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b></p>

			<p><b>A.1.5.5. Availability of suitable alternatives</b>  <b>C.1.1. General principles for exemptions under Art. 58(2)</b>  <b>C.1.3. Aspects not justifying an exemption from authorisation</b></p>
4914 2022/05/02	Federal-Mogul Wiesbaden GmbH - A Tenneco Company, Company, Germany	<p><a href="#">4914 Public Version Lead Consultation I Tenneco.pdf</a>  <i>Confidential attachment removed</i></p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b>  <b>A.1.5.5. Availability of suitable alternatives</b>  <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence</b>  <b>A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation</b>  <b>A.2.12 Postpone lead recommendation until after ongoing revisions of Batteries regulation, ELV, RoHS, IED, BOEL/BLV under CAD</b></p>

			<b>B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users) B.2.01. Request extra long LAD C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b>
4916 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4916_SNeuenbeken22050216130.pdf</a>	Please see response to comment # 3585
4917 2022/05/02	Individual, Belgium	<a href="#">4917_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4918 2022/05/02	Atelier Vitrail du Mont Royal, Company, France	<a href="#">4918_2022.04.25 - CNSV - Réponse consultation ECHA - Contribution anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4919 2022/05/02	Individual, Germany	Any further regulation of lead is unacceptable. All the arguments we submitted for the consultation of Annex XVII are valid for Annex XIV as well. The sad happenings of today caused by the aggression of Russia in Ukraine raised the question from a health and environmental level to strategic defence and security levels.  Risks of further regulation of lead  Understanding the critical situation EU member states face today due to the Russian aggression in Ukraine, we consider any further regulations of using lead for manufacturing ammunition both for military, law enforcement and civil purposes a direct threat on both defence and security and security of food supply chain.	<b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV C.2.07 Exemption for uses necessary in the interests of defence/military uses</b>



<p>4920 2022/05/02</p>	<p>Robin des Bois, International NGO, France</p>	<p>Robin des Bois is a NGO based in Paris with international activities. The NGO was founded in 1985. It is approved in France for the protection of the environment. We have been working for about 20 years on industrial sites polluted by lead and on the various uses of lead in everyday life. We thank you for considering the banning of tetraethyl lead in aircraft fuels as a priority. We have done a lot of work on the causes and consequences of the Notre-Dame de Paris fire and the subsequent dispersion of lead aerosols. We found that lead sheets and plates continued to be used in the building industry, particularly for the roofs of historic buildings and on balconies in Haussmann-style architecture, despite expert advice emphasising the dispersion of lead due to erosion, wind and rain, wear and tear and trampling. These initial warnings, as you will see below, were issued as early as 2003, and the stakeholders have since refused to implement alternative solutions. Please find attached extracts from the intervention of Mr. SQUINAZI, member of the current High Council of Public Health (he was part of the previous body, the High Council for Public Hygiene). His intervention dates from 8 November 2021 during the Steering Committee of the Lead Plan set up by the City of Paris after the cathedral fire. Mr. SQUINAZI was also director of the hygiene laboratory of the City of Paris from 1984 to 2013.</p> <p>"Mr SQUINAZI: Thank you for your invitation to speak about this opinion of the High Council for Public Health of 1 February 2021 concerning the uses of lead in the building industry. The High Council for Public Health, in this opinion, notes that the relationship between lead and the building industry results in a rather imperfect regulation. I would like to remind you that in February 1993, ceruse paints and lead sulphate were banned; lead chromates were also reviewed with the regulation on chemical products.</p> <p>However, as you know, this ceruse paint problem was discovered in the mid-1980s, so it took several years before this type of paint was actually banned. Commercial mixtures containing at least 0.3% inorganic lead derivatives are no longer available to the public but can still be used by professionals.</p> <p>I wanted to focus on lead-containing items, especially the rolled lead sheet you just mentioned, for which there are no regulations, even though rolled lead sheet is ubiquitous, especially in buildings and in Haussmann architecture. These rolled lead sheets are currently sold and are also used for roofing, since, I would remind you, there are no regulations on the use of this rolled lead sheet in buildings.</p> <p>In April 2003, the French High Council for Public Hygiene (I was then a member of the living environment section) issued an opinion on the use of lead sheet or plate in construction. It</p>	<p><b>A.2.20 NGO highlighting toxicity of lead sheets in building</b></p>
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		<p>showed that this rolled lead sheet had both health risks and environmental risks; the lead present in these sheets or plates could degrade and be transformed into bioavailable species on the upper surface in contact with the air and precipitation, and on the lower surface, by condensation in contact with the stone. The FHCPH had noted that direct contact with directly accessible rolled lead sheet, whether on terraces, balconies or windowsills, could lead to bioavailable species, particularly for young children. Lead could also be washed away by run-off water.</p> <p>In an opinion issued in 2003, the FHCPH proposed banning the use of lead in sheets or foil in new buildings, banning it in renovation work, with a time limit for studying alternative solutions, possibly providing for exemptions for historic monuments and for all radiology practices that obviously use lead sheets, and also systematically investigating the presence of lead in sheets and foil in buildings in environmental surveys in cases of lead poisoning. What has remained of this FHCPH opinion is only the search, in environmental surveys, for the presence of this rolled lead; as for the rest, nothing has really changed, particularly the search for new alternative solutions or its inclusion in lead accessibility risk assessments.</p> <p>The Technical Lead Committee, a body attached to the Ministry of Health, has taken up the issue of lead sheeting in the wake of the FHCPH's work, and has held hearings with the Rolled Lead Information Centre and the Association of Non-Ferrous Minerals and Metals. During this hearing, the Technical Lead Committee said that at that time (I do not think that this has changed much since then) large quantities of rolled lead were still being used in Europe, including 16,000 tonnes in France. According to the centre and the association, the environmental pollution was negligible, it was very difficult to find substitute materials, it was possible to protect these lead sheets with plastic gratings, and a ban would lead to bankruptcy: no more production for the nuclear industry, hospitals, radiology practices, and no more possibilities for recycling lead. This hearing showed that it was urgent to wait before banning, given the consequences that this could bring. Since this meeting of 14 October 2003, the Lead Technical Committee has not ruled on this subject.</p> <p>This was taken up by this opinion of the High Council for Public Health (that succeeded to French High Council for Public Hygiene) , which was seized by the Ministry of Health on this issue of lead in the building industry, and therefore on rolled lead. I would remind you that the High Council for Public Health was created in 2004 by the Public Health Act, and that it was set up in 2007. It took over from the work of the Lead Technical Committee I just mentioned and that was dissolved.</p> <p>The work of the High Council for Public Health showed, contrary to what had been said previously, that :</p>	
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		<ul style="list-style-type: none"> <li>- Roofing plates could emit lead in various ways depending on their inclination and age;</li> <li>- For the rolled lead elements in the façade, emissions were less significant;</li> <li>- When lead was present in the building, it appeared in high concentrations in run-off water, in the courtyards of buildings, on the road, in gutters and in sewers.</li> </ul> <p>The High Council for Public Health, in summarising the few available studies, has shown the impact of lead emissions in buildings on environmental pollution and in run-off water.</p> <p>With regard to poisoning by this lead sheet, we were aware of occupational poisoning associated with the use or removal of this lead sheet when precautions were not taken. Little was known about extra-occupational poisoning. The opinion of the High Council for Public Health of February 2021 states that published cases of lead poisoning are few for the general population but notes that about 13% of children with lead poisoning had been exposed to rolled lead according to environmental surveys conducted between 2011 and 2019.</p> <p>The High Council has made a number of recommendations, which to my knowledge have not yet been taken into account. Concerning the use of lead sheet in buildings, the High Council recalls what was already recommended by the FHCPH in 2003:</p> <ul style="list-style-type: none"> <li>- Prohibit the use of rolled lead sheet in new buildings;</li> <li>- Identify the uses of rolled lead sheet in buildings throughout the ages, and seek alternatives, in consultation with building professionals, which has not been done since the 2003 hearing of the Lead Technical Committee;</li> <li>- To find alternative solutions. The High Council is only taking up what was already requested in 2003 (almost 20 years ago), namely to find alternative solutions to the use of lead in the building industry. (...)"</li> </ul> <p>Mr. SQUINAZI reaffirmed in the meeting of the Lead Committee of 25 January 2022 "the importance of avoiding the presence of lead in new buildings and during renovations and of finding alternative solutions."</p> <p>It appears from the statements of Mr. SQUINAZI and other experts that lead used in outdoor housing is dispersive and deserves to be considered by your high authority as a material to be proscribed.</p> <p>Thank you for your attention.</p>	
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		We are available for further information exchange. I would like to inform you that I am a member of the Supervisory Board of ANSES (French Agency for Food, Environmental and Occupational Health & Safety) and that the President of the NGO Robin des Bois, Charlotte Nithart, is my deputy on this Board. Jacky Bonnemains	
4922 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4922_SNeuenbeken22050216230.pdf</a>	Please see response to comment # 3585
4923 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4923_SNeuenbeken22050216231.pdf</a>	Please see response to comment # 3585
4924 2022/05/02	ABB AG, Company, Germany	Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low. Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product. Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation"	Please see response to comment # 4239
		<i>Confidential attachment removed</i>	
4925 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4925_SNeuenbeken22050216290.pdf</a>	Please see response to comment # 3585
4926 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4926_SNeuenbeken22050216300.pdf</a>	Please see response to comment # 3585
4927	Glasmalerei Peters,		

2022/05/02	Company, Germany	<a href="#">4927_SNeuenbeken22050216302.pdf</a>	Please see response to comment # 3585
4928 2022/05/02	Glasmalerei Peters, Company, Germany	<a href="#">4928_SNeuenbeken22050216301.pdf</a>	Please see response to comment # 3585
4929 2022/05/02	Aerospace Industries Association (AIA), Industry or trade association, United States of America	<p>Section 2.3 of the February 2, 2022, DRAFT Background Document appears to considerably underestimate the dispersive uses of elemental lead in the EU market across all sectors. For purposes of the Aerospace &amp; Defense (A&amp;D) sector, the Aerospace and Defense Industries Association of Europe (ASD) submitted on May 5, 2021, a detailed representation of the presence and critical use of elemental lead in the sector. Such uses are considered low in volume, but essential (including safety and mission criticality) for a wide range of uses in aircraft, defense system products and space systems/vehicles.</p> <p>Further, the algorithm used by ECHA in prioritizing substances to recommend a substance for Authorisation did not appear to account for such A&amp;D uses, which could have likely resulted in a different score and not considered for prioritisation onto Annex XIV.</p> <p>Lastly, Section 3.3.1 of the DRAFT Background Document leans heavily on prior exemption considerations related to "lead compounds" which is completely different from this effort on elemental lead. Categorically, they are 2 separate and distinct forms of the chemical substance (elemental vs. compounds), and therefore then should be treated accordingly. Using conclusions on lead compounds is wholly inappropriate as applied to elemental lead.</p> <p>Therefore, it remains unclear as to why ECHA did not account for the information provided in May 2021 related to critical uses in A&amp;D in its framing of the current consultation background document.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.3. Use specific considerations</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.03 Suggest lower (WDU) score considering existing EU legislation contributing to improved risk control</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.33 Background document does not reflect sufficiently the available information on certain uses</b></p>
4930 2022/05/02	WindEurope Asbl, Industry or trade association, Belgium	<p>On 2 February 2022, ECHA included lead in the draft recommendation to include this substance in Annex XIV to the REACH Regulation (the so-called "Authorisation list").</p> <p>Based on the draft background document for lead, we understand that ECHA included lead in the draft recommendation for the following reasons:</p> <p>1) Lead was identified as a substance of very high concern ("SVHC") according to Article 57(c) in 20184 as it classified as toxic for reproduction, category 1A in accordance with Regulation</p>	Please see response to comment # 4114

		<p>1272/2008 ("the CLP Regulation");</p> <p>2) The amount of lead manufactured and/or imported into the European Union ("EU") is above 1,000,000 t/y; and</p> <p>3) The registered uses of lead in the scope of the authorisation include uses at industrial sites and uses by professional uses, as well as uses in articles.</p> <p>The legal basis used by ECHA to include lead in the draft recommendation is Article 58(3) of the REACH Regulation, according to which priority for inclusion in the Authorisation List "shall be given to substances with:</p> <p>1) PBT or vPvB properties; or</p> <p>2) wide dispersive use; or</p> <p>3) high volumes."</p> <p>In its Prioritisation Approach, ECHA states that the criteria set out in Article 58(3) of the REACH Regulation "are not exclusive and that a substance may be prioritised for the recommendation for other reasons. However, in such cases the reasons for prioritisation must be clearly set out and be in line with the role and purpose of the recommendation step in the authorisation process" (pages 3 and 4).</p> <p>ECHA also states that, although Article 58(3) of the REACH Regulation is the primary basis for prioritisation, further considerations on which substances are recommended for inclusion in Annex XIV to the REACH Regulation take into account other ongoing regulatory risk management activities, in order to avoid undesired interference between different regulatory actions (page 4 of the Prioritisation Approach).</p> <p>WindEurope however supports the opinion that lead does not meet the three prioritisation criteria set out in Annex XIV to the REACH Regulation and the draft recommendation does not sufficiently take into account existing and ongoing regulatory risk management activities.</p> <p>I) Prioritisation criteria</p> <p>(a) Lead material properties and classification</p> <p>Lead has been classified as a substance toxic to reproduction category 1A due to its intrinsic properties. It is identified as a SVHC and included in the Candidate List due to this specific hazard category. However, lead has not been identified as a PBT or vPvB substance and, accordingly, the score assigned to lead in reason of its properties is the lowest, i.e. 1.7</p> <p>As lead is not a PBT or vPvB substance and has been accordingly assigned the lowest score with regard to the properties category, WindEurope believes lead should not be recommended for priority inclusion in the Authorisation List based purely on its intrinsic properties alone.</p>	
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		<ul style="list-style-type: none"> <li>• Distinguish between the uses of substances that occur in relatively low amounts in applications which are not relevant to the concern for which lead has been identified as an SVHC (e.g. lead sheathing in cables) from those that occur in larger amounts which are relevant to the concern that led to the inclusion of a substance in the SVHC list;</li> <li>• Differentiate between the possible limited risks associated with the uses; and</li> <li>• Recognise the overall reduction of lead use in the EU as a result of to the adoption of targeted risk management measures highlighted earlier.</li> </ul> <p>WindEurope believes lead should not have received a non-differentiated maximum scoring of 15/15 on volumes.</p> <p>II) Other regulatory activities</p> <p>Although ECHA's Prioritisation Approach states on page 4 that to avoid undesired interference, "other on-going risk management activities can also be considered when deciding on which substances to include in a specific recommendation" the draft background document for lead does not make mention of any of the ongoing activities. These include:</p> <ul style="list-style-type: none"> <li>• The revision of OEL and BLV for lead. ECHA itself proposed to establish an OEL (8 hour TWA) of 30 µg/m<sup>3</sup> and a BLV of 150 µg/l for inorganic lead compounds and organic compounds (alkyl lead compounds).</li> <li>• The proposal to restrict the placing on the market and use of lead in projectiles (firearms and airguns), and in fishing sinkers and lures for outdoor activities.</li> <li>• The proposal in the draft REACH Restriction Roadmap to restrict polyvinyl chloride and all its additives, including lead.</li> <li>• The overall revision of the REACH Regulation within the Chemicals Strategy for Sustainability ("CSS"). This revision will likely amend and simplify the authorisation and restriction processes.</li> <li>• The revision of the RoHS Directive as part of the Circular Economy Action Plan.</li> <li>• The revision of Directive 2010/75/EU on industrial emissions</li> </ul> <p>These ongoing regulatory activities will result in legislative changes that will have a direct impact on the prioritisation of lead for inclusion in Annex XIV to the REACH Regulation:</p> <ol style="list-style-type: none"> <li>1. The revision of the OEL and BLV for lead will further protect industrial and professional workers handling lead.</li> <li>2. The ongoing restriction processes concerning lead (i.e. the restriction on the placing on the market and use of lead in projectiles, fishing sink and lures and a possible restriction on PVC and its additives) overlap with the current prioritisation process.</li> <li>3. The prioritisation and authorisation processes of lead will run in parallel with the revision of the REACH Regulation. Such revision will have an impact on the substances currently being considered for prioritisation insofar as either the authorisation process will be amended in order to provide clarifications and simplifications that could be beneficial to</li> </ol>	
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		<p>manufacturers/importers/downstream users of lead or be removed from the REACH Regulation.</p> <p>4. The upcoming revision of the RoHS Directive might lead to the revocation of the current restrictions on the use of lead in electrical and electronic equipment, thereby further reducing human and environmental exposure to the substance.</p> <p>5. The upcoming revision of Directive 2010/75/EU on industrial emissions will cover additional sources of environmental pollution, further decreasing environmental exposure to lead.</p> <p>6. The revision of Directive 2000/53/EC might introduce additional restrictions on the presence of lead in vehicle components.</p> <p>These ongoing regulatory initiatives and their potential impacts should have been considered by ECHA before recommending to subject lead to authorisation under the REACH Regulation. In line with the EU's 'better regulation' ambitions WindEurope believes ECHA should have refrained from recommending lead for inclusion in Annex XIV until the wider regulatory framework was established. This primarily to avoid legal uncertainty and incoherence.</p>	
4931 2022/05/02	Commission Internationale Permanente pour l'épreuve des armes à feu portatives - C.I.P. - , International organisation, Belgium	<a href="#">4931_CIP opinion on Annex XIV draft_2_May 2022_Final_rs.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.1. Potential other regulatory actions</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p><b>C.2.07 Exemption for uses necessary in the</b></p>

			interests of defence/military uses
4932 2022/05/02	Landschaftsverband Westfalen Lippe (LWL), Regional or local authority, Germany	<a href="#">4932_02052022_European Chemicals Agency_Blei.pdf</a>	Please see response to comment # 3585
4933 2022/05/02	L'Atelier du Vitrail, Company, France	<a href="#">4933_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	
4935 2022/05/02	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“. Nur so vermeiden wir ein Debakel wie es gerade beim Thema Gas aussieht. Verbote ohne Alternativen bedeuten ein Ende. <a href="#">4935_Pro-und-Kontra-zum-Bleiverbot.pdf</a>	Please see response to comment # 4287
4936 2022/05/02	VdR Verband der Restauratoren, Other contributor, Germany	Subject: Request for an exemption for the use of lead in designed windows Referring to the proposed EU Regulation [REACH Annex XIV, EC No 231-100-4]  Danger to our European cultural heritage and to the art of stained glass Risk of destruction of the profession of stained glass painters and restorers Risk for the restoration/preservation of metal wrought iron objects such as grids, staircases and the attachment of hewn natural stones at high altitudes.  Ladies and Gentlemen, Mrs. Mariya Gabriel, Lead, cast, drawn or cold-formed in the form of lead rust or rolled lead, is an indispensable and essential component in the manufacture and restoration of stained glass windows. Fixed at its intersection points with solder, it forms a strong and durable basic structure that can carry coloured and painted glass. It is an art form with a thousand-year history that can be found in world-famous buildings such as the cathedrals of Chartres, Notre Dame de Paris and Sainte Chapelle (France), the cathedrals of Cologne and Naumburg (Germany), the cathedrals of Brussels and Antwerp (Belgium) and the cathedrals of Canterbury and York Minster (association). The cathedrals of Leon and Girona (Spain), and the National Cathedral, Washington DC (USA). Every single religious building in Europe is unimaginable without lead-framed windows. This art form is also one of the greatest treasures of museums such as the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow), to name a few. Lead glazing flourished as an art phenomenon in medieval Europe and underwent a great revival in the 19th century. Today, it is practised all over the world and has modern artists of	Please see response to comment # 3585

		<p>international renown such as Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistemann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz and Gerhard Richter enthusiastically.</p> <p>The malleability, strength and durability of lead over centuries have made its unique properties irreplaceable as an essential component of stained glass. Without lead, the historic windows of our cultural monuments and museums could not be repaired, conserved and preserved. It would also be impossible to create great works of art in this genre, so this material is indispensable for the survival and preservation of this unique art form.</p> <p>The toxicity of lead is well known and its health risks are effectively managed by professional stained glass artists, processors and restorers around the world. The use of exhaust systems, appropriate personal protective equipment (PPE) and regular blood tests, among other things, ensure that the many thousands of people working in the industry do so safely and with minimal and carefully controlled risk.</p> <p>We urge ECHA and the European Commission to exempt the use of lead in the production, preservation, storage and presentation of stained glass from the proposed ban. Such a ban would not only destroy the livelihoods of glass artists, artisans and restorers involved in the preservation of the glass heritage in Europe, but would also make it more difficult to maintain and present these works in museums, churches and public buildings. The effects of such a ban would be felt all over the world and would ultimately mean the death sentence for one of mankind's most beautiful art forms.</p>	
		<a href="#">4936 Request for exemption REACH Annex XIV, EC No 231-100-4 .pdf</a>	
4937 2022/05/02	KMBL Konferenz der Museumsberater der Länder, Regional or local authority, Germany	<a href="#">4937 Votum KMBL ECHA.pdf</a>	Please see response to comment # 4554
4938 2022/05/02	Individual, Finland	<p>Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low.</p> <p>Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product.</p> <p>Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation".</p>	Please see response to comment # 4239
		<i>Confidential attachment removed</i>	

4939 2022/05/02	MAK - Österreichisches Museum für angewandte Kunst, Other contributor, Austria	<a href="#">4939 Brief Blei signed.pdf</a>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b></p> <p><b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b></p> <p><b>A.1.5.4. Control of risks</b></p> <p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.1.5.6. Socio-economic benefits of continued use</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>C.1.3. Aspects not justifying an exemption from authorisation</b></p> <p>Please see response to comment # 3875</p>
4940 2022/05/02	Glasrestaurierung Sterzing, Company, Germany	<a href="#">4940 Glasrestaurierung Sterzing Bitte Ausnahmeregelung Blei.pdf</a>	

			Please see response to comment # 3585
4941 2022/05/02	Glasrestaurierung Sterzing, Company, Germany	<a href="#">4941 Glasrestaurierung Sterzing Bitte Ausnahmeregelung Blei.pdf</a>	Please see response to comment # 3585
4942 2022/05/02	Kreisagrarmuseum Dorf Mecklenburg, Other contributor, Germany	<a href="#">4942 Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (DM).pdf</a>	Please see response to comment # 3585
4943 2022/05/02	Gorduna vzw, National NGO, Belgium	<a href="#">4943 recom com call for info questionnaire-Gorduna vzw.pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.2.36 Attached COM questionnaire</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.08 Exempt use in art and building sector</b>
4944 2022/05/02	Individual, Luxembourg	see attachment <a href="#">4944 lettre european blei.pdf</a>	Please see response to comment # 3585
4945 2022/05/02	Atelierhaus Rösler-Kröhnke, Other contributor, Germany	<a href="#">4945 Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (KB).pdf</a>	Please see response to comment # 4554

4946 2022/05/02	Individual, France	En tant que potier céramiste, j'utilise un émail composé de plomb dont les normes ont été contrôlées par une analyse sanitaire en laboratoire agréé. Sans l'utilisation de cet émail, je me verrai obligé de cesser mon activité.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
4947 2022/05/02	Individual, Germany	<a href="#">4947_2022-05-02_Protest_Bleiverbot.pdf</a>	Please see response to comment # 3585
4948 2022/05/02	ets pinon severine, Company, France	<a href="#">4948_2022.04.25.-CNSV-Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4949 2022/05/02	Landesfachstelle Museum, Museumsverband in Mecklenburg-Vorpommern e. V., Other contributor, Germany	<a href="#">4949_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (mvmv).pdf</a>	Please see response to comment # 4554
4950 2022/05/02	Individual, Belgium	<a href="#">4950 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4951 2022/05/02	WirtschaftsVereinigung Metalle. e.V., Trade union, Germany	In principle WVMetalle does not recognize the REACH authorisation as the best regulatory management tool for lead and lead compounds. The existing legislation framework, especially the EU binding limit values for all occupational settings, is the most effective regulatory management tool for lead and lead compounds. If specific risk outside the occupational area needs to be addressed beyond the measures already in place, targeted restrictions would be more effective and proportionate than inclusion in REACH Annex XIV, the most recent example being the proposed REACH Restriction on lead in ammunition and fishing tackle.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.2.06 Question the added value of the authorisation requirement, stress the risk of double</b>

			<p>regulation and ask for regulatory coherence A.2.08 BOEL more effective to address occupational exposure than Authorisation A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation B.1.1. General principles for setting latest application dates/sunset dates B.1.1.1. Legal background B.1.1.2. ECHA's proposal for sunset dates B.1.1.3. ECHA's proposal for latest application dates B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates B.1.2.1. Extensive time needed in the supply chain to get organised for preparing application (e.g. due to high number of users) B.1.2.2. Lack of alternatives, socio-economic aspects</p>
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			<b>B.2.05 Due to REACH review more time needed to prepare AfA</b>  Please see response to comment # 3856
4952 2022/05/02	Individual, Germany	<a href="#">4952_2022-05-02_Protest_Bleiverbot_Helsinki.pdf</a>	Please see response to comment # 3585
4953 2022/05/02	Individual, Germany	Request for exemption for the use of lead on art and cultural property, in relation to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4] <a href="#">4953_Letter_to_ECHA_english.pdf</a>	Please see response to comment # 3740
4954 2022/05/02	L'ATELIER DU VITRAIL, Company, France	<a href="#">4954_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4956 2022/05/02	Monumenta, National NGO, Spain	<a href="#">4956_ECHA_Lead_ICOMOS_ICOM_ECCO_lettertemplate_EN_(004)_MONUMENTA-BONET.docx</a>	Please see response to comment # 3875
4957 2022/05/02	Michel Pradeilles - Vitrail de l'Ange, Company, France	<a href="#">4957_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4958 2022/05/02	Individual, Belgium	Je pense qu'il faudrait une exception au plomb pour le travail des vitraux qui est une véritable ART. Ne laissons pas disparaître cet art svp	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4959 2022/05/02	Individual, Germany	<a href="#">4959_220502_ECHA_Blei_deu.pdf</a>	Please see response to comment #

			4554
4960 2022/05/02	Union der deutschen Akademien der Wissenschaften, Academic institution, Germany	<a href="#">4960_2022_05_02_European Chemical Association.pdf</a>	Please see response to comment # 3585
4961 2022/05/02	Individual, Germany	<a href="#">4961_220502_ECHA_Lead_engl.zip</a>	Please see response to comment # 4554
4962 2022/05/02	Individual, France	<a href="#">4962_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4963 2022/05/02	Bayerischer Jagdverband e.V., National NGO, Germany	Hunting ammunition (shot and rifle ammunition) <a href="#">4963_BJV Comments_recommendations.zip</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.35 Comment on Annex XV restriction dossier</b>

4964 2022/05/02	Erkenbert-Museum Frankenthal (Pfalz), Other contributor, Germany	<a href="#">4964_EBM Protest_Bleiverbot Kopie 2 (1).docx</a>	Please see response to comment # 3585
4965 2022/05/02	Individual, France	<a href="#">4965_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4966 2022/05/02	URGENCES PATRIMOINE, Other contributor, France	<a href="#">4966_Urgences Patrimoine - Observations Consultation.pdf</a>	Please see response to comment # 3862
4967 2022/05/02	Atelier Couleurs Vitrail, Company, France	<a href="#">4967_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf</a>	Please see response to comment # 3862
4970 2022/05/02	Institut National des Métiers d'Art , Other contributor, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4971 2022/05/02	Individual, France	<i>Confidential attachment removed</i>	Please see response to comment # 3862
4972 2022/05/02	L'en Verre de Décor, Company, France	<a href="#">4972_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4973 2022/05/02	Kommission für Normen (KoNo) [commission for standards of CEN TC-346 Conservation of Cultural Property],	<a href="#">4973_Letter of Support.pdf</a>	Please see response to comment # 3875

	Academic institution, Switzerland		
4974 2022/05/02	Individual, Ireland	<a href="#">4974_The European Chemicals Agency.docx</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
4975 2022/05/02	Individual, France	<a href="#">4975_2022.04.25. - CNSV - R ®ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4976 2022/05/02	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“ Nur so vermeiden wir ein Debakel wie es gerade sich anbahnt (denkt euch was aus) Verbote ohne Alternativen bedeuten ein Ende.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b>
4977 2022/05/02	Individual, Belgium	We need an exception for the preservation of cultural heritage.	<b>C.1.3. Aspects not justifying an exemption from authorisation</b>
4978 2022/05/02	Individual, Belgium	<a href="#">4978_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4979 2022/05/02	ABB AB, Company, Sweden	Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low. Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service and recycling phase of End Product. Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation".	Please see response to comment # 4239

		<i>Confidential attachment removed</i>	
4980 2022/05/02	Protestant Church in Germany (EKD) - Brussels Office, Other contributor, Germany	<a href="#">4980_2022-05-02 Stellungnahme EKD.pdf</a>	Please see response to comment # 3585
4981 2022/05/02	Individual, France	<a href="#">4981_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4982 2022/05/02	Hungarian Hunters' National Chamber, National NGO, Hungary	<p>Subject: Inclusion of lead in Annex XIV of REACH regulation</p> <p>Dear Madam/Sir,</p> <p>On behalf of the Hungarian Hunters' National Chamber we are submitting the following report on including lead in Annex XIV of the REACH regulation. Any further regulation of lead is unacceptable. All the arguments we submitted for the consultation of Annex XVII are valid for Annex XIV as well. The sad happenings of today caused by the aggression of Russia in Ukraine raised the question from a health and environmental level to strategic defence and security levels. Risks of further regulation of lead</p> <p>Understanding the critical situation EU member states face today due to the Russian aggression in Ukraine, we consider any further regulations of using lead for manufacturing ammunition both for military, law enforcement and civil purposes a direct threat on both defence and security and security of food supply chain.</p> <p>1. Any further regulation of lead used for manufacturing ammunition or in any areas of civil industry producing products for military, law enforcement and civil purposes is considered a direct threat of reducing the productivity of critical infrastructure serving the defence and security sector or both Hungary and all other EU member states. Ammunition is manufactured in plants producing goods both for civil and military use. Any further regulation of the civil manufacture or use of lead bullets can drastically reduce the production capacities serving the military and law enforcement.</p> <p>2. A full ban on use of lead for manufacturing ammunition forces the industry to a manufacturing technology change with such short term, the industry will not be able to follow. We do not see</p>	Please see response to comment # 4826

		<p>any indication of plans for covering the cost of such transitions or covering the loss generated by losing the pay-off possibility of previous investments in lead bullet manufacturing machinery and procedures.</p> <p>3. Due to the insecurity of ammunition manufacturing within the EU, the industry will be willing to relocate the production capacities outside the geographical coverage of the REACH regulations, resulting loss of jobs, loss of tax revenues within the EU, while drastically reducing the potentials of the European defence industry.</p> <p>4. Any further regulation of lead as material for bullets for hunting will have a strong effect on the food supply chain security. Based on previous statistics, in case of a total ban on using lead projectiles for hunting 25% of the hunters will quit hunting, while the remaining hunters will hunt 30% less. This will necessarily increase the amount of damage caused by the game in the agriculture and forestry. (<a href="https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/">https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/</a>) In the light of the Ukrainian-Russian conflict, the importance of the security of the food supply chain became an increasingly important strategical question for all EU member states.</p> <p>5. Including lead in the Annex XIV of the REACH regulation will ban using lead bullets for the law enforcement organizations of the EU member states, as only defence purposes can be considered as exceptions according Article 2 3.: "Member States may allow for exemptions from this Regulation in specific cases for certain substances, on their own, in a preparation or in an article, where necessary in the interests of defence."</p> <p>6. Inclusion of lead in Annex XIV shall have an effect of manufacturing batteries as vast majority of lead (84% in 2015) is used for this purpose. In light of the Ukrainian-Russian conflict the strategic importance of devices storing energy increased drastically.</p> <p>7. Inclusion of lead in Annex XIV shall nearly automatically render vast majority of firearms designed for lead bullets unserviceable, it will raise safety concerns in case of shotguns designed for lead shot, it will reduce accuracy of firearms and airguns used for target shooting and will reduce the effectivity of hunting rifles designed for lead core bullets.</p> <p>8. All Olympic and most ISSF international shooting events require lead bullets/shots to be competitive. After the ban no EU athletes can participate such events abroad, and no international competitions can be held in EU countries.</p> <p>9. All historical muzzleloaders and their replicas are safe only with lead bullets both for target shooting and hunting purpose. As there are millions of muzzleloader guns (mostly unregulated) in the hands of European citizens, it is potentially hazardous to force them to use alternative</p>	
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bullet materials. The lead ban also terminates the sport shooting and hunting with these guns.

10. Approximately 400,000 big game are harvested in Hungary every year, and hunting is almost occurs with hunting rifles. This large number is hunted by 68,000 Hungarian hunters and approximately 30,000 foreign hunters arriving from abroad. As in the other European countries, the management of big game populations (at least maintaining, but more likely reducing) is a considerable effort by the hunters, and at certain periods it is more of a task than a hobby.

The phasing out of lead ammunition is expected to have an impact on big game management due to the expected increased price of alternative ammunition and possibly less suitable hunting rifles, as well.

Therefore less number of hunters will be able to participate in the large-scale harvest of big game, so populations of big game species will increase. As a consequence of it there will be increase in damages in crops by game, in game-vehicle collisions and also in human conflicts resulting from their presence within the municipalities.

Our proposals

1. In light of the current defence and security situation faced by the EU member states due to the Russian aggression in Ukraine we are against any further regulation of lead by including it in Annex XIV.

2. We find it necessary to interrupt the procedure of any further regulation of lead under Annex XVII and Annex XIV.

3. It is essential to apply exclusion from the regulations of Annex XIV for manufacturing and using lead and lead core bullets to save the ammunition manufacturing capacity serving the defence and public security/law enforcement sector, and to maintain hunting at a level required to reduce damage to agricultural lands and forestry.

Péter Bajdik  
Secretary-General

Hungarian Hunters' National Chamber  
e-mail: info@omvk.hu  
Address: H- 3000 Hatvan, Kossuth sq. 24.

		Mobile: +36-30/283-9081	
		<a href="#">4982 ECHA letter OMVK HU 20220502.docx</a>	
4983 2022/05/02	ABB AB, Company, Sweden	Lead is encapsulated in commercial articles or in homogenous materials/ substances/mixtures used in the End Product. Amount of lead per single article is very low. Presence of lead in articles or homogenous materials/ substances/mixtures does not possess risk for Health, Safety and Environment in assembly, use, service nor recycling phase of End Product. Industry is already reporting Products containing lead above 0.1% w/w in SCIP database under Waste Framework Directive (WFD) as required by REACH article 33 for safe use and recycling. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation".	Please see response to comment # 4239
		<i>Confidential attachment removed</i>	
4984 2022/05/02	Sachverständigenbüro Dr. Ivo Rauch, Company, Germany	Please see attached pdf file with comments <a href="#">4984 Exemption for lead RAUCH ECHA.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585
4985 2022/05/02	Individual, France	<a href="#">4985 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4987 2022/05/02	Individual, Belgium	<a href="#">4987 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4988 2022/05/02	Individual, Belgium	<a href="#">4988 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
4989 2022/05/02	Fédération Française du Bâtiment, Industry or trade association, France	<a href="#">4989 Réponse FFB Consultation plomb ECHA .pdf</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b>



			<p><b>A.1.5.5. Availability of suitable alternatives</b></p> <p><b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b></p> <p><b>A.2.26 Perception that other lead compounds would be affected by the inclusion of lead metal (EC 231-100-4) in Annex XIV</b></p> <p><b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p> <p><b>C.2.08 Exempt use in art and building sector</b></p>
4990 2022/05/02	Individual, France	<a href="#">4990_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4991 2022/05/02	Individual, France	<a href="#">4991_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
4992 2022/05/02	Individual, Belgium	<a href="#">4992_Versicolore.pdf</a>	Please see response to comment # 4330
4995 2022/05/02	Atelier vitrail lepoutre, Company, France	<a href="#">4995_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862

4997 2022/05/02	Individual, Germany	We strongly advocate that any proposed amendments to the REACH regulation to include lead in the Authorisation List of Annex XIV must include exemptions that allow for the continued use of lead in the conservation and repair of Europe's cultural heritage and by the cultural and creative sectors and industries.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.2.33 Background document does not reflect sufficiently the available information on certain uses</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
		<a href="#">4997 Response REACH directive lead OMC CC and CH.pdf</a>	
4998 2022/05/02	ATELIER VITRAIL HIPPOCAMPE CELINE BOISTEAU, Company, France	<a href="#">4998 2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
4999 2022/05/02	Fondation pour le Vitrail Pierre et Marcelle Majerus Nizet, Company, Belgium	<i>Confidential attachment removed</i>	Please see response to comment # 3862
5000 2022/05/02	Individual, France	<a href="#">5000 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5001 2022/05/02	Studio Vitrail Bianconi , Company, France	<a href="#">5001 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5002	Individual,		

2022/05/02	Austria	<a href="#">5002 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5003 2022/05/02	Individual, Germany	<a href="#">5003 Marx ECHA (deutsch).docx</a>	Please see response to comment # 4554
5004 2022/05/02	Studio Vitrail Bianconi , Company, France	<a href="#">5004 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5005 2022/05/02	Individual, France	<a href="#">5005 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5006 2022/05/02	Individual, Austria	<a href="#">5006 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5007 2022/05/02	Individual, Czech Republic	<a href="#">5007 Musterbrief_Protest.docx</a>	Please see response to comment # 3585
5008 2022/05/02	Individual, France	<a href="#">5008 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5009 2022/05/02	Individual, Belgium	<a href="#">5009 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5010	Individual,		

2022/05/02	France	<a href="#">5010_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5011 2022/05/02	Individual, Belgium	<a href="#">5011_2022.04.25. - CNSV - R�ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5012 2022/05/02	Individual, Czech Republic	<a href="#">5012_Milan Masojidek - Letter to ECHA about lead and stained glass.docx</a>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.1. Potential other regulatory actions</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
5013 2022/05/02	Bild-Werk Frauenau, International organisation, Germany	As a glass school we have to teach how to work with lead for artists / craftspeople who will have a career repairing restoring and recreating leaded stained glass	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b>
5016	Individual,		

2022/05/02	France	<a href="#">5016_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5017 2022/05/02	Atelier für Steinrestaurierung, Company, Germany	<a href="#">5017_Andreas Muth, D-08066 Zwickau, Verwendung von Blei bei der Restaurierung von Kunst- und Kulturgut.pdf</a>	Please see response to comment # 3862
5018 2022/05/02	laure cornil, Company, France	<a href="#">5018_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5019 2022/05/02	Landschulmuseum Göldenitz, Company, Germany	<a href="#">5019_Gefahr für Kulturerbe- Unterschriftexemplar.pdf</a>	Please see response to comment # 4554
5020 2022/05/02	Individual, Italy	<a href="#">5020_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais 7.pdf</a>	Please see response to comment # 3862
5021 2022/05/02	Individual, Belgium	<a href="#">5021_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5022 2022/05/02	TEPPFA aisbl, Industry or trade association, Belgium	Authorisation requirement for lead metal under REACH TEPPFA position  The plastic pipe industry uses brass components in the systems for heating, cooling and drinking water. The components are a.o. valves and fittings to connect the pipes, e.g. elbows and manifolds. These brass components can to a certain extent be replaced by alternative materials, such as plastics and stainless steel. However, both due to the building tradition and to a number of practical and functional reasons, brass fittings are needed for efficient, tight and long-lasting function of the systems. We find that a REACH authorisation process of lead would be disproportionate given the following facts:	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b>

		<p>Technical function of lead in copper alloys is important The lead present in the brass components contributes to key technical functions, for example, it increases the efficiency of machining processes, lubricates tools and increases corrosion resistance.</p> <p>Framework for safe drinking water is in place Regulation for safe drinking water has been in place for many years and there are strict limits to avoid leaching of lead into the drinking water. In connection to the implementation of the revised Drinking Water Directive the limits will be revised and narrowed down, and furthermore, the directive will ensure same high level of water quality across Europe.</p> <p>Circularity will be difficult Lead-containing brass has a complex value chain with many uses in various areas. From industrial, transport, building, electrical and electronics, consumer applications and construction inclusive components in plastic pipe systems. The inclusion of lead in the authorisation process will make recycling of these materials difficult if not, impossible. This will expose EU' recycling and circular economy aspirations and harm the competitiveness of the European industry.</p> <p>No risk for workers For controlling the exposure risk for workers, there is a general industry consensus that the ongoing update of the EU occupational exposure limits is the best-suited measure.</p> <p>About TEPPFA TEPPFA is the European Plastic Pipe and Fittings Association founded in 1991 with headquarters in Brussels. TEPPFA's multinational company members and national associations across Europe represent 350 companies that manufacture plastic pipes and fittings for building and infrastructure applications. TEPPFA's members have an annual production volume of 3 million tonnes directly employing 40,000 people with €12 billion combined annual sales. TEPPFA positions itself as polymer neutral. Transparency register: 82117319399-44 Contact: Ludo Debever, ludo.debever@teppfa.eu, tel: +32 27366378</p>	<p><b>A.1.5.7. Potential competitive disadvantage</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.08 BOEL more effective to address occupational exposure than Authorisation</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b> <b>C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation</b></p>
5023 2022/05/02	Individual, France	<p><a href="#">5022_Authorisation of Lead. TEPPFA position. Final.pdf</a></p> <p><a href="#">5023_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment #

			3862
5024 2022/05/02	Individual, France	<a href="#">5024_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5026 2022/05/02	Individual, Germany	Bei allen Verboten „die Verfügbarkeit von Alternativen analysieren und deren Risiken sowie die technische und wirtschaftliche Machbarkeit der Substitution berücksichtigen“ Nur so vermeiden wir ein Debakel, wie es gerade stattfindet. Verbote ohne Alternativen bedeuten ein Ende	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.5. Availability of suitable alternatives</b>
5027 2022/05/02	Individual, Belgium	<a href="#">5027_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5028 2022/05/02	Individual, Germany	<a href="#">5028_EU-Verbot Blei Finnland.pdf</a>	Please see response to comment # 3585
5029 2022/05/02	ARTIS, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short <a href="#">5029_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5030 2022/05/02	le chant du diamant, Company, France	<a href="#">5030_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5031 2022/05/02	Individual, France	<a href="#">5031_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862

5032 2022/05/02	Technikrestaurierung Martin Möbus, Company, Germany	<p>Bitte Blei nicht verbieten! Blei ist ein wichtiges Material, das im Bereich der Restaurierung und im traditionellen Handwerk eine wichtige Rolle spielt. Historische Glasfenster, Dacheindeckungen, Säрге historischer Persönlichkeiten und viele andere Bereiche des kulturellen Erbes lassen sich nur mit dem richtigen Material optimal erhalten oder ergänzen, wenn Fehlstellen vorhanden sind. Selbst bei Design der klassischen Moderne (Frankfurter Küche) habe ich an einem Wasserbecken die originale Blei-Abflussleitung verlängern müssen, was nur mit einem Bleirohr möglich war. Blei ist Bestandteil vieler Legierungen. Gerade bei Lötzinn ist ein Bleianteil von bis zu 40% notwendig, um bestimmte Eigenschaften zu erhalten. Ohne Blei werden viele traditionelle handwerkliche Tätigkeiten unmöglich gemacht. Wissen stirbt aus und kulturelles Erbe ist gefährdet, wenn es nicht mit den historischen Techniken und Materialien erhalten werden kann, weil bestimmte Dinge wie z.B. Blei nicht mehr ohne besondere Ausnahmegenehmigungen und bürokratischen Aufwand verwendet werden dürfen.</p> <p>Dass Blei ein gesundheitsschädliches Material ist, weiß jeder, der damit arbeitet und wendet entsprechende Schutzmaßnahmen an. Ein Verbot würde den Verantwortlichen die Verantwortung entziehen. Bitte erhalten Sie die Eigenverantwortung ihrer Mitbürger mit professionellem Fachwissen! Kein Verbot von Blei in Handwerk und Restaurierung! Vielen Dank.</p> <p><a href="#">5032_Martin Möbus Stellungnahme zu geplantem Bleiverbot in der EU.doc</a></p>	Please see response to comment # 3585
5033 2022/05/02	Individual, Germany	<p>In Deutschland ist auf Schießständen jeweils ein den Vorschriften entsprechender Geschossfang im Einsatz. In der Regel wird dort Sand als Geschossfang verwendet. Dieser wird regelmäßig ausgetauscht und der alte Sand den Vorschriften entsprechend entsorgt. Daher kann kein Blei in die Umwelt gelangen. Daher ist ein generelles Verbot von Blei unverhältnismäßig und nicht notwendig.</p>	<p><b>A.1.5. Aspects not considered in ECHA's prioritisation</b>  <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b>  <b>A.1.5.3. Use specific considerations</b>  <b>A.1.5.4. Control of risks</b></p>
5034 2022/05/02	Individual, France	<p><a href="#">5034_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>  Confidential attachment removed</p>	Please see response to comment # 3862
5035 2022/05/02	Ecklat-Atelier verre, Company, France	<p><a href="#">5035_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
5036 2022/05/02	Individual, France	<p><a href="#">5036_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment #



5037 2022/05/02	Individual, Czech Republic	<p>Sehr geehrte Damen und Herren, sehr geehrte Frau Mariya Gabriel,</p> <p>das Material Blei, gegossen, gezogen oder kalt verformt in Form von Bleiruten oder Walzblei, ist ein unverzichtbarer und wesentlicher Bestandteil bei der Herstellung und Restaurierung von Glasmalerei-Fenstern. An seinen Kreuzungspunkten mit Lot fixiert, bildet es eine starke und langlebige Grundstruktur, die farbiges und bemaltes Glas tragen kann.</p> <p>Es handelt sich um eine Kunstform mit einer tausendjährigen Geschichte, die in weltberühmten Bauwerken wie den Kathedralen von Chartres, Notre Dame de Paris und Sainte Chapelle (Frankreich),</p> <p>den Kathedralen von Köln und Naumburg (Deutschland), den Kathedralen von Brüssel und Antwerpen (Belgien) sowie der Kathedrale von Canterbury und dem York Minster (Vereinigtes Königreich) zu finden ist, auch in den Kathedralen von Leon und Girona (Spanien), in der National Cathedral, Washington DC (USA). Jeder einzelne Sakralbau in Europa ist ohne bleigefasste Fenster unvorstellbar.</p> <p>Diese Kunstform gehört überdies zu den größten Schätzen von Museen wie dem Victoria and Albert Museum (London), dem Metropolitan Museum (New York), dem Schnuetgen Museum (Köln) und der Burrell Collection (Glasgow), um nur einige wenige exemplarisch zu nennen.</p> <p>Nachdem die Bleiverglasung im mittelalterlichen Europa als Kunstphänomen eine Blütezeit erreichte und im 19. Jahrhundert ein großes Revival erlebte, wird sie heute in der ganzen Welt praktiziert und hat moderne Künstler von internationalem Rang wie zum Beispiel Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke, Narcissus Quagliata, Markus Lüpertz und Gerhard Richter begeistert.</p> <p>Die Formbarkeit, Festigkeit und Nachhaltigkeit von Blei über Jahrhunderte hinweg haben dazu geführt, dass dessen einzigartigen Eigenschaften als wesentlicher Bestandteil von Glasmalereien unersetzlich sind. Ohne Blei könnten die historischen Fenster unserer Kulturdenkmäler und Museen nicht repariert, konserviert und erhalten werden. Es könnten zudem keine großartigen Kunstwerke in dieser Gattung mehr erschaffen werden, so dass dieses Material für den Fortbestand und die Erhaltung dieser einzigartigen Kunstform unverzichtbar ist.</p> <p>Die Toxizität von Blei ist sehr gut bekannt, und seine Gesundheitsrisiken werden von professionellen Glasmalerei-Künstlern, -Verarbeitern und -Restauratoren in der ganzen Welt wirksam gehandhabt. Die Verwendung von u. a. Absauganlagen, geeigneter persönlicher Schutzausrüstung (PSA) und regelmäßige Bluttests sorgen dafür, dass die vielen Tausend Menschen, die in dieser Branche arbeiten, dies sicher und mit einem minimalen und sorgfältig</p>	3862  Please see response to comment # 3585
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		<p>kontrollierten Risiko tun.</p> <p>Wir fordern die ECHA und die Europäische Kommission nachdrücklich dazu auf, die Verwendung von Blei bei der Herstellung, Erhaltung, Lagerung und Präsentation von Glasmalereien von dem vorgeschlagenen Verbot auszunehmen. Ein solches Verbot würde nicht nur den Lebensunterhalt von Glaskünstlern, Kunsthandwerkern und Restauratoren, die sich mit der Pflege des Glasmalereierbes in Europa befassen, vernichten sondern auch die Pflege und Präsentation dieser Werke in Museen, Kirchen und öffentlichen Gebäuden erschweren. Die Auswirkungen eines solchen Verbots wären in der ganzen Welt zu spüren und würden letztlich das Todesurteil für eine der schönsten Kunstformen der Menschheit bedeuten.</p> <p>Mit freundlichen Grüßen, Richard und Jitka Kanta</p>	
5038 2022/05/02	Individual, France	<p><a href="#">5038_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i></p>	Please see response to comment # 3862
5039 2022/05/02	Individual, France	<p><a href="#">5039_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
5040 2022/05/02	Atelier DADA, Regional or local authority, France	<p><a href="#">5040_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a></p>	Please see response to comment # 3862
5041 2022/05/02	SPECTARIS e.V., Industry or trade association, Germany	<p>The "Draft Background Document for Lead" mentions that the amount of lead manufactured and/or important in the EU is over 1,000,000 t/year. The inclusion of such a widely used material in Annex XIV of REACH could have far-reaching negative consequences. The assessment must take into account that not all lead-containing products come into direct contact with humans. In such cases, the exposure risk is greatly reduced or almost non-existent. This scenario should be considered in any case and no blanket statement should be made.</p>	<p><b>A.1.1. General, recommendation process</b>  <b>A.1.1.1. ECHA's obligation to recommend/prioritise substances on the Candidate List</b>  <b>A.1.1.2. Legal basis for prioritisation</b></p>

			<b>A.1.1.3. Prioritisation approach applied</b> <b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.3. Use specific considerations</b> <b>A.1.5.4. Control of risks</b>
5042 2022/05/02	Individual, France	<a href="#">5042_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5043 2022/05/02	Individual, France	<a href="#">5043_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5044 2022/05/02	Individual, France	<a href="#">5044_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5045 2022/05/02	Individual, France	<a href="#">5045_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5046 2022/05/02	Individual, Belgium	<a href="#">5046_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf</a>	Please see response to comment # 4330
5047 2022/05/02	Individual, Belgium	<a href="#">5047_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment #

			4330
5048 2022/05/02	Individual, France	<a href="#">5048_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5049 2022/05/02	Individual, France	<a href="#">5049_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5051 2022/05/02	Individual, France	<a href="#">5051_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5052 2022/05/03	The Stained Glass Association of America, Industry or trade association, United States of America	<a href="#">5052_2022 Letter from the SGAA.pdf</a>	Please see response to comment # 3585
5055 2022/05/03	Dept of Archaeology, Durham University, Academic institution, United Kingdom	<a href="#">5055_Lead-authorizationletter (002).docx</a>	Please see response to comment # 3740
5056 2022/05/03	Individual, France	<a href="#">5056_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5057 2022/05/03	À la lumière du verre, Company, France	<a href="#">5057_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5058 2022/05/03	Individual, France	<a href="#">5058_2022.04.25. - CNSV - R @ponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment #

			3862
5060 2022/05/03	Individual, France	<a href="#">5060_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5061 2022/05/03	Individual, France	<a href="#">5061_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3862
5062 2022/05/03	Individual, Germany	see PDF-file attached  <i>Confidential attachment removed</i>	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b> <b>A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV</b> <b>A.2.22 Clarification on Authorisation requirement for handling finished articles or historic artefacts</b>
5063 2022/05/03	Cocoroca , Company, France	<a href="#">5063_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5064	Atelier Audrey Rogers,		

2022/05/03	Company, France	<a href="#">5064_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf</a>	Please see response to comment # 3862
5065 2022/05/03	Individual, Germany	see PDF-file attached  <i>Confidential attachment removed</i>	Please see response to comment # 5062
5066 2022/05/03	Individual, United Kingdom	I am a contemporary glass artist. I strongly urge the European Commission to exclude the use of lead in the fabrication and conservation of stained glass from its proposed ban. Lead is an indispensable component in the fabrication of both contemporary and historic stained glass windows.	<b>A.1.5.2. Authorisation is disproportionate and/or means a ban</b> <b>C.1.1. General principles for exemptions under Art. 58(2)</b> <b>C.1.3. Aspects not justifying an exemption from authorisation</b>
5067 2022/05/03	Individual, Poland	Traditional stained glass, based on glass connections through lead profiles, necessitates the use of lead, especially in the case of renovation and reconstruction works. This is a traditional art that is safe for workers to use basic PPE such as gloves and workshop ventilation when brazing. In fact, pure lead, like all metals, is not absorbed well, in fact, metal oxides are dangerous because they absorb much better. Practice shows that the vast majority of people who work with the techniques of vitality (both professionally and as a hobby) do not have elevated standards of lead content in the body, which is a practical testimony that, while adhering to the principles of personal protection, you can work with this message without endangering health.	<b>A.1.5. Aspects not considered in ECHA's prioritisation</b> <b>A.1.5.4. Control of risks</b> <b>A.1.5.5. Availability of suitable alternatives</b> <b>A.1.5.6. Socio-economic benefits of continued use</b>
5068 2022/05/03	Individual, Belgium	<a href="#">5068_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	Please see response to comment # 4330
5069 2022/05/03	Individual, Belgium	1. There is no substitute for lead in stained glass, as lead is the only long-lasting material allowing, due to its malleability, a precision crimping that no other material offers. 2. There is no consumer exposure to lead as, once installed, stained glass windows are not subject to manipulation by their owners. 3. Exposure to lead for professionals is already strictly controlled, as implementation of	Please see response to comment # 4330

		<p>appropriate protocols are already in use within stained glass workshops.</p> <p>4. There is no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%.</p> <p>Last but not least, would the authorization process be required, stained glass workshops (in Europe usually VSEs of 1 or 2 persons) would never have the administrative resources to bear the cost of producing an authorization application file for each project, and the market is too small for suppliers to take an interest in them.</p>	
		<a href="#">5069 CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf</a>	
5070 2022/05/03	Historisches Museum Aurich, Company, Germany	<a href="#">5070 Ausnahmeregel Blei in Kunst und Museen_HMA 2022.pdf</a>	Please see response to comment # 3585
5071 2022/05/03	Individual, Germany	<a href="#">5071 denkmal-und-farbe.pdf</a> <i>Confidential attachment removed</i>	Please see response to comment # 3585