12 April 2023

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

II - Transitional arrangements. Comments on the proposed dates

Number / Date	Submitted by (name, submitter type, country)	Comment	Reference to responses
3577 2022/02/02	Dr. Fischer Group, Company, Germany	As explained before, we hope to not finding lead in Annex XIV anytime in the future. For us it is no use to discuss any of the effects of that happening at this stage of the process.	Thank you for your opinion.
3578 2022/02/23	CIMAP, Company, France	No lead is used or found in our products at all	Thank you for the information provided
3583 2022/04/13	European Semiconductor Industry Association (ESIA), Industry or trade association, Belgium	ESIA would like to stress that the semiconductor industry has been working on technical issues with programmes for managing and seeking replacements for lead use in semiconductors since the early 2000s through the E3 initiative and the Die Attach 5 Project. However, a replacement for lead in solder alloys in the semiconductor production has not been found yet. Currently, there is no prospect that a replacement will be found in the near future. Consequently, the proposed Latest Application Date will not allow the semiconductor industry to replace lead. Nevertheless, if lead was included in Annex XIV of the REACH Regulation, ESIA requests that, in light of the	**B.1.2. Aspects not considered by ECHA when proposing latest application**

		highly complex nature of the manufacturing process, the long R&D and investment cycles of the semiconductor industry, as well as the nature of the supply chains, mostly being located outside of the EU, the 24-month timeframe would be chosen for the Latest Application Date. 	**dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects** **B.2.01. Request extra long LAD**
3584 2022/04/14	GROHE AG, Company, Germany	Should lead be included in Annex XIV of REACH, the sanitary appliances sector would need sufficient time to organise as a high number of potential applicants from our industry is to be expected. [Indeed, according to the European Drinking Water association, around 5000 companies manufacture finished products in contact with drinking water, most of which are SMEs. The products include notably pipes, fittings, water storage systems, measurement apparels as well as taps and sanitary appliances.] Additional to this, the recycling supply chain needs to be involved in any type of process change as they will be heavily affected by any change in the composition of the brass material. Most of sanitary appliances are produced from metallic alloys. Indeed, the JRC MEErP Preparatory Study on Taps and Showers (2014) provides that 90-99% of the taps produced in Europe are made mostly of brass. Should lead be included into Annex XIV of REACH, downstream users of brass alloys in the sanitary appliances sector may choose to submit applications individually or jointly. If applications are made individually, a high number of submissions should be expected. Should the industry decide to submit joint applications, experience has shown that these are often less documented as companies would have to face issues related to the compilation of individual data into combined information which are de facto less representative. Experience has also shown that joint applications often result in shorter review periods and hence earlier review reports for ECHA to process. In both cases, an application for authorisation by this industry, mostly composed of SMES will induce a high burden of workload both for the authorities and companies. To overcome the intrinsic disadvantage of joint applications, solid and time consuming collaboration needs to be developed between the applicants taking into account IP and confidentiality concerns. We would therefore request that longer transitional arrangements are applied to allow companies in the sector and the supply chain, sufficient time to organise in order to maximise the quality of submissions. *Confidential attachment removed*	**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** **B.1.3. Review periods** **B.2.01. Request extra long LAD** **B.2.02 Difficulty/time**

			needed to prepare joined AfAs and uncertainty whether authorisation will be granted B.2.03 Joined AfAs result in shorter review periods
3585 2022/04/14	Fachhochschule Erfurt, Academic institution, Germany	3585_Anschreiben ECHA FHE.pdf	
3587 2022/04/14	Charlotte Roden Stained Glass, Company, Italy	3587_Letter to ECHA.pdf	
3589 2022/04/14	Dombauhütte Köln, Other contributor, Germany	3589_Bleiverarbeitungseinschränkung 2.docx	
3590 2022/04/14	Individual, United Kingdom	3590_Copy of EN Sample letter stained glass and lead template letter.docx.pdf	
3591 2022/04/14	Cathedral Architects' Association, Academic institution, United Kingdom	3591_EN stained glass 01_140422.pdf	
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. 3592_ECHA_Blei Ausnahmeregelung.pdf *Confidential attachment removed*	Please see response to comment # 3585
3593 2022/04/14	The York Glaziers Trust, Company, United Kingdom	3593_YGT letter to ECHA.pdf	
3594 2022/04/14	Corpus Vitrearum National Commitee Catalunya,	Lead is a fundamental material in Stained Glass Creation and Conservation 3594_Stained glass and lead letter Catalan CV.pdf	

	Academic institution, Spain		Please see response to comment # 3585
3596 2022/04/14	Individual, United States of America	I am a stained glass artist and I would hate for other artist to suffer from taking lead work away. If handled safely and with promotion I feel artist should be able to continue to work with lead!	**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**
3603 2022/04/15	Individual, Germany	3603_Anschreiben ECHA priv.pdf	
3613 2022/04/15	Individual, United Kingdom	3613_Objection to proposed REACH restrictions on use of Lead.pdf	
3616 2022/04/15	Individual, United States of America	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 rich cultural history and the preservation of existing glass windows across Europe, stained glass lead came should be exempted.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.5. Availability of suitable alternatives A.1.5.6. Socio-economic benefits of continued use**

3621 2022/04/16	Staatliche Glasfachschule Rheinbach, Academic institution, Germany	3621_220414-lead-ECHA.pdf	
3622 2022/04/16	Individual, Germany	---	
3626 2022/04/17	Individual, United Kingdom	3626_ES Carta modelo sobre vidrieras y plomo.docx *Confidential attachment removed*	
3631 2022/04/18	Individual, Germany	3631_Blei.pdf	
3632 2022/04/18	Université de Strasbourg, Institut d'histoire de l'art, Academic institution, France	3632_Lettre ECHA.pdf	
3633 2022/04/18	Individual, United Kingdom	3633_REACH Annex XIV, EC Number 231-100-4.pdf	
3635 2022/04/19	van Heyningen and Haward Architects LLP, Company, United Kingdom	See above.	Please see references to responses in section I
3636 2022/04/19	Individual, Germany	3636_Protest_Bleiverbot.pdf	
3638 2022/04/19	Gustav van Treeck GmbH, Company, Germany	*Confidential attachment removed*	
3639 2022/04/19	Serpentino Stained Glass, Inc., Company, United States of America	3639_ECHA .docx	
3641 2022/04/19	US Committee of the Corpus Vitrearum Medii Aevi (CVMA),	3641_Corpus Vitrearum US appeal for the exclusion of lead in stained-glass windows.pdf	

	Academic institution, United States of America		
3642 2022/04/19	Tobit Curteis Associates LLP, Company, United Kingdom	3642_ECHA 01 REACH ANNEX XIV, EC NUMBER 231-100-4.pdf	
3643 2022/04/19	Individual, Germany	*Confidential attachment removed*	
3644 2022/04/19	Individual, Germany	3644_Musterbrief_zur_freien_Verwendung_Aenderung.docx	
3645 2022/04/19	Individual, Germany	*Confidential attachment removed*	
3647 2022/04/20	Individual, Belgium	3647_Voorbeeldbrief_aan_ECHA_Europese_commissie 2.docx	
3649 2022/04/20	Individual, Belgium	a centuries old art form is bound to dissapear if lead is restricted in stained glass	Please see references to responses in section I
3651 2022/04/20	Individual, Germany	3651_EU_Verbot_fuer_Blei.docx	
3652 2022/04/20	Stiftung Historische Museen Hamburg - Museum für Hamburgische Geschichte, Other contributor, Germany	3652_2022 ECHA-Blei.pdf	
3653 2022/04/20	DirryOntwerpt!, Company, Netherlands	3653_D.C. de Bruin commentaar op de nieuwe voorgestelde regeling Lood.pdf	
3654 2022/04/20	Glasmalerei Ernst Kraus e. K., Company, Germany	*Confidential attachment removed*	

3656 2022/04/20	Universalmuseum Joanneum, Other contributor, Austria	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 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 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	Please see response to comment # 3585

		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 Ass. Prof. Dr. rer. medic. Dipl.-Rest. (FH) Paul-Bernhard Eipper Leiter Restaurierung /Fellow of IIC paul-bernhard.eipper@museum-joanneum.at Telefon +43-699/1330-8811 Mobil +43-664/8017-9561 Universalmuseum Joanneum Museumsservice Weinzöttlstraße 16, 8045 Graz, Austria www.museum-joanneum.at	
3658 2022/04/20	Committee of Art Sciences of the Polish Academy of Sciences , Academic institution, Poland	3658_Uchwała KNoS w sprawie zakazu używania ołowiu.docx	
3659 2022/04/20	Van der Staaij Ambachtelijke Restauratie, Company, Netherlands	3659_Voorbeeldbrief_aan_ECHA_Europese_commissie (1).doc.docx	
3660 2022/04/20	Individual, Belgium	3660_doc_lood.pdf	
3661 2022/04/20	Canterbury Cathedral, Other contributor, United Kingdom	3661_20220420 ECHA t.pdf	
3662 2022/04/20	Individual, Germany	3662_SRestaurier22042013000.pdf	
3663 2022/04/20	Restaurierungsatelier & Mosaikkunst Dyroff, Company, Germany	3663_Kommentar EU Verbot von Blei_2.pdf	
3664 2022/04/20	Individual, Germany	Ronald Krüger Im Dorfe 38	

		99438 Oettern 20.04.2022 An die European Chemicals Agency (ECHA) P.O. Box 400 FI-00121 Helsinki Finnland Upload bis spätestens 02. Mai 2022 unter: https://comments.echa.europa.eu/comments_cms/InclusionRecommendation.aspx?substancename=Lead&ecnumber=231-100-4 UND/ODER: An Ms. Mariya Gabriel Directorate-General for Education and Culture European Commission 1049 Bruxelles/Brussel Belgium Upload spätestens 02. Mai 2022 unter: https://comments.echa.europa.eu/comments_cms/CallForInfo.aspx?substancename=Lead&ecnumber=231-100-4 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	Please see response to comment # 3585

		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 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 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 Ronald Krüger	
3665 2022/04/20	Wien Museum, Regional or local authority,		
		3665_WM_Bleiverbot.pdf *Confidential attachment removed*	

	Austria		
3666 2022/04/20	Atelier Illumen, Company, Belgium		
		3666_Brief aan ECHA - Europese commissie.docx.pdf	
3667 2022/04/20	Individual, Germany		
		3667_Bleibrief.docx	
3668 2022/04/20	voestalpine Wire Austria GmbH, Company, Austria		
		3668_voestalpine Wire Austria GmbH + voestalpine Special Wire GmbH - Use of Lead.pdf	
3669 2022/04/21	GLACRYL Hedel GmbH, Company, Germany		
		3669_GLACRYL Lead Pb.pdf *Confidential attachment removed*	
3671 2022/04/21	Staatliche Dombauhütte Regensburg, Company, Germany		
		3671_Dombauhütte_Ausnahmeregelung_Blei.pdf	
3672 2022/04/21	Dombauhütte Köln, Other contributor, Germany		
		3672_Anschreiben Dombauhütte Glasrestaurierung.pdf	
3674 2022/04/21	Evangelische Kirche Heidelberg, Other contributor, Germany		
		3674_20220421144654.pdf	
3675 2022/04/21	hosanna, Company, Belgium		
		3675_Brief aan ECHA_hosanna.pdf	
3678 2022/04/21	Vitraux en binôme, Company, Belgium		
		3678_Dérogation plomb vitraux.pdf	
3679 2022/04/21	Individual, Germany		
		3679_Anschreiben Belgien.docx	
3681 2022/04/22	Individual, Germany		
		Confidential attachment removed	
3682	Riehle+Assoziierte GmbH+Co. KG,		
		3682_2022_04_22 Antrag Ausnahmeregelung Blei Europäische Kommission SB.pdf	

2022/04/22	Industry or trade association, Germany		
3683 2022/04/22	FH Potsdam, Stadt I Bau I Kultur, Academic institution, Germany	Ausnahmen vom generellen Verbot von Blei und Bleierzeugnissen für die Erhaltung kulturellen Erbes 3683_Protestnote gegen ein generelles Verbot von Blei_FHP_Helsinki.pdf	Please see references to responses in section I Please see response to comment # 3585
3684 2022/04/22	Koninklijke Academie voor Schone Kunsten Antwerpen - DKO, Academic institution, Belgium	3684_KASKA_DKO.pdf	
3685 2022/04/22	Exeter Cathedral, Other contributor, United Kingdom	3685_Letter to ECHA - stained glass and lead - Exeter Cathedral.docx	
3686 2022/04/22	Individual, France	Diagnostica Stago wishes to comment on public consultation related to lead - see confidential document attached (page 4). *Confidential attachment removed*	Please see references to responses in section I
3688 2022/04/22	VDMA Armaturen I VDMA Valves, Industry or trade association, Germany	s. attachment 3688_Statement VDMA Armaturen_REACH Blei Anhang XIV_20220422.pdf	Please see references to responses in section I
3689 2022/04/22	Individual, Germany	Sehr geehrte Damen und Herren! 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. 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. Farbige Bleiverglasungen und bleiverglaste Glasmalereien sind ein wertvoller Teil unserer Kultur und müssen deshalb erhalten, gefördert und geschützt werden.	Please see references to responses in section I

		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. Ladies and Gentlemen! 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). 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. Colored stained glass and stained glass are a valuable part of our culture and must therefore be preserved, promoted and protected. 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.	
3690 2022/04/22	Berlin-Brandenburgische Akademie der Wissenschaften, Corpus Vitrearum Medii Aevi. Arbeitsstelle für Glasmalereiforschung Potsdam, Academic institution, Germany	3690_Letter_CVMA_Germany_ECHA.pdf	
3691 2022/04/22	Individual, Germany	Es ist ein altes Handwerk, das durch dieses Gesetz aussterben würde	**A.1.5.6. Socio-economic benefits of continued use** Thank you for your comment.
3695 2022/04/23	Art Historical Dept. of Bonn University, Academic institution, Germany	*Confidential attachment removed*	
3696			

2022/04/23	Carel Kruip Glas-In-Lood, Company, Netherlands	3696_Protestbrief_loodvergunning.docx	
3699 2022/04/24	AvD-Glas, Company, Netherlands	3699_Blei_ECHA.docx	
3707 2022/04/24	Individual, Netherlands	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]. 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. 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. 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. 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.	Please see response to comment # 3585
3708 2022/04/24	Individual, Germany	3708_Schreiben ECHA.pdf	
3712 2022/04/25	Individual, Canada	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].	

		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. 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. 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. 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.	Please see response to comment # 3585
3714 2022/04/25	Individual, Australia	N/A	
3716 2022/04/25	RSP GmbH, Restaurierung und Denkmalpflege, Company, Germany	3716_Comment[REACH Anhang XIV, EG-Nummer 231-100-4].doc	
3717 2022/04/25	HAVER & BOECKER, Company, Germany	3717_recom_com_call_for_info_questionnaire_en.docx	
3719 2022/04/25	Individual, Germany	3719_Ausnahmegenehmigung Blei Helsinki.pdf	
3721 2022/04/25	Albert Jung GmbH, Glaserei & Kunsthandel, Company, Germany	*Confidential attachment removed*	

3722 2022/04/25	Union Académique Internationale, International organisation, Belgium	3722_066.IA.KH.2022.UAI.pdf	
3726 2022/04/25	Stiftung Preußischer Kulturbesitz Berlin, Kunstgewerbemuseum, Regional or local authority, Germany	*Confidential attachment removed*	
3727 2022/04/25	DERIX GLASSTUDIOS GmbH & Co. KG, Company, Germany	3727_EHCA (Derix Glasstudios).pdf	
3729 2022/04/25	Individual, Germany	3729_EHCA (R.Schmitt).pdf	
3730 2022/04/25	Exeter Cathedral, Other contributor, United Kingdom	3730_Letter to ECHA - stained glass and lead - Exeter Cathedral JG.docx	
3733 2022/04/25	Individual, United Kingdom	If Lead was placed on the list it would lead to significant problems for the conservation and restoration of historical stained glass windows in churches and museum collections throughout the UK, Europe and the rest of the world. Churches everywhere have stained glass windows that require restoration from time to time and lead plays a major role, without the ability to use lead in restoration this country would loose much of its beautiful features in churches and cathedrals. The lead is high up so members of the public can admire its beauty but are unable to come into direct contact with it.	**A.1.5. Aspects not considered in ECHA's prioritisation** **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**
3734 2022/04/25	Fenix Glas BV, Industry or trade association, Netherlands	3734_brief_aan_ECHA_Europese_commissie (1).docx	
3738	AvD-Glas Koblenz,		

2022/04/25	Company, Germany	3738_Loodverbod_ECHA_.docx	
3739 2022/04/25	Germany, Member State	*Confidential attachment removed*	
3740 2022/04/25	Verband der Restauratoren (German Professional Association of Restorers-Conservators), National NGO, Germany	3740_VDR-Brief_EuropeanChemicalsAgency.pdf	
3741 2022/04/25	Verband der Restauratoren, National NGO, Germany	3741_VDR-Brief_EuropeanChemicalsAgency.pdf	
3742 2022/04/25	Verband der Restauratoren (German Professional Association of Conservator-Restorers), National NGO, Germany	3742_VDR-letter_EuropeanChemicalsAgency.pdf	
3744 2022/04/25	British Society of Master Glass Painters, Industry or trade association, United Kingdom	3744_BSMGP representation.docx	
3745 2022/04/25	Individual, Germany	3745_EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4]_Finnland.pdf	
3746 2022/04/25	British Society of Master Glass Painters, Industry or trade association, United Kingdom	3746_BSMGP representation.pdf	
3747 2022/04/25	Swiss Association for Conservation and Restoration SKR/SCR, Other contributor,	3747_2022_Brief ECHA .pdf	

	Switzerland		
3748 2022/04/25	Bayerisches Landesamt für Denkmalpflege, Regional or local authority, Germany	 3748_2022-04-25 Blei ECHA.pdf	
3752 2022/04/25	Beulco GmbH & Co KG, Company, Germany	- Should lead be included in Annex XIV of REACH, the sanitary appliances sector would need sufficient time to organise as a high number of potential applicants from our industry is to be expected. [Indeed, according to the European Drinking Water association, around 5000 companies manufacture finished products in contact with drinking water, most of which are SMEs. The products include notably pipes, fittings, water storage systems, measurement apparels as well as taps and sanitary appliances.] - Additional to this, the recycling supply chain needs to be involved in any type of process change as they will be heavily affected by any change in the composition of the brass /red brass material. - Most of sanitary appliances are produced from metallic alloys. Indeed, the JRC MEErP Preparatory Study on Taps and Showers (2014) provides that 90-99% of the taps produced in Europe are made mostly of brass. - Should lead be included into Annex XIV of REACH, downstream users of brass alloys in the sanitary appliances sector may choose to submit applications individually or jointly. - If applications are made individually, a high number of submissions should be expected. - Should the industry decide to submit joint applications, experience has shown that these are often less documented as companies would have to face issues related to the compilation of individual data into combined information which are de facto less representative. Experience has also shown that joint applications often result in shorter review periods and hence earlier review reports for ECHA to process. - In both cases, an application for authorisation by this industry, mostly composed of SMES will induce a high burden of workload both for the authorities and companies. - To overcome the intrinsic disadvantage of joint applications, solid and time consuming collaboration needs to be developed between the applicants taking into account IP and confidentiality concerns. Our company would therefore request that longer transitional arrangements are applied to allow companies in the sector and the supply chain, sufficient time to organise in order to maximise the quality of submissions. *Confidential attachment removed*	Please see references to responses in section I
3753	Individual, United Kingdom	 3753_Lead letter.docx	

2022/04/25			
3755 2022/04/25	Individual, United Kingdom	3755_Stained glass and lead legislation H Jaeschke.docx	
3756 2022/04/25	GAMBICA, Industry or trade association, United Kingdom	Larger bespoke industrial products generally have a much longer life-cycle and therefore take much longer in the research and design process to make any kind of change. 3756_Lead use in RoHS exemptions.docx	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
3757 2022/04/25	Landesamt für Denkmalpflege Baden Württemberg, Regional or local authority, Germany	Bitte um Ausnahmeregelung für die Verwendung von Blei in der Denkmalpflege mit vielfältigen Anwendungen in der Konservierung, Restaurierung und traditionellen Handwerkstechniken sowie der Bildenden Kunst bezogen auf die vorgeschlagene EU-Verordnung [REACH Anhang XIV, EG-Nummer 231-100-4] 3757_Brief Ausnahmeregelung für die Verwendung Blei in der DP -Brief an ECHA Finnland.docx *Confidential attachment removed*	Please see response to comment # 3740
3758 2022/04/25	Individual, United Kingdom	3758_ECHA letter 2022-04-25.pdf	
3759 2022/04/25	Individual, United Kingdom	3759_letter regarding use of lead.pdf	
3760 2022/04/25	Individual, Germany	3760_Einspruch Wasmuth.pdf	
3762 2022/04/25	Individual, Germany	3762_Brief-_ECHA_.pdf	
3767 2022/04/25	Individual, United Kingdom	3767_letter re lead.pdf	

3768 2022/04/25	Individual, Poland	Please exclude stained glass art creation from this act so that artists can still produce their art pieces.	**C.1.3. Aspects not justifying an exemption from authorisation**
3770 2022/04/25	Historisches Museum der Pfalz - Speyer, Academic institution, Germany	Without lead important areas of conservation-restoration in our museums or cultural monuments cannot be carried out furthermore. Moreover, this material is indispensable for the knowledge transfer of historical techniques and their reconstructions.	Please see references to responses in section I
3774 2022/04/26	Individual, Canada	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]. 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. 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. 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. 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.	Please see response to comment # 3585
3775 2022/04/26	Individual, Germany	Schedule is much too fast, should be at least 10 years and there must be suggestions for alternatives that are both usable and affordable.	**B.1.2. Aspects not considered by ECHA when proposing latest**

			application dates / sunset dates **B.1.2.2. Lack of alternatives, socio-economic aspects**
3776 2022/04/26	Glashuette Lamberts Waldsassen GmbH, Company, Germany	3776_2022_04_22 Glashuette Lamberts - comments on draft recommendation for Annex XIV (ECHA).pdf	
3778 2022/04/26	Museum Moderner KUnst Stiftung Ludwig Wien, European institution, Austria	3778_Brief.docx	
3779 2022/04/26	Swiss National Museum, Other contributor, Switzerland	3779_Brief ECHA.pdf	
3780 2022/04/26	Individual, Germany	Lead Ban for hunting and sport shooting ammunition as well as sport fishing is not appropriate!	Please see references to responses in section I
3781 2022/04/26	Deltamess DWWF GmbH, Industry or trade association, Germany	3781_Stellungnahme zur Aufnahme von Blei.pdf	
3782 2022/04/26	Friedrich Emigholz GmbH, Company, Germany	3782_Brief gegen Bleiverbot.pdf	
3783 2022/04/26	W.E. Schultz GmbH, Industry or trade association, Switzerland	3783_recom_com_call_for_info_questionnaire_en.pdf	
3785 2022/04/26	Silvergkass Studios, Other contributor, United Kingdom	The banning of lead would mean the end of the tradition of stained glass manufacture and would endanger existing windows in churches, cathedrals and public buildings. It would also mean the end if small businesses and studios involved in stained glass window production.	**A.1.5. Aspects not considered in ECHA's prioritisation**

			A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.5. Availability of suitable alternatives A.1.5.6. Socio-economic benefits of continued use
3786 2022/04/26	Individual, Germany	Absender: Anja Listl Lukas-Kern-Str. 2 94032 Passau 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 Gefahr der Zerstörung der Berufsausübung für Glasmaler und Glasmalereirestauratoren, 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	Please see response to comment # 3585

		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 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 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 Anja Listl (Glaskünstlerin) www.anja-listl.de	
3789	Ministero della Cultura,		

2022/04/26	National Authority, Italy	3789_20220426_090847.PDF	
3790 2022/04/26	Individual, Germany	3790_Bleiverbot Brief.pdf	
3792 2022/04/26	De Witte Raaf, Company, Netherlands	3792_brief aa nECHA en Mariya Gabriel, Directorate-General for Education and Culture.zip	
3795 2022/04/26	Individual, Switzerland	*Confidential attachment removed*	
3796 2022/04/26	Bundesinnungsverband des Glaserhandwerks, Industry or trade association, Germany	3796_ECHA Einspruch Bleiverglasung.pdf	
3797 2022/04/26	Erzbistum Köln, Generalvikariat, Other contributor, Germany	3797_2022.04.25_European Chemicals Agency_Helsinki.pdf	
3798 2022/04/26	Stiftung Deutsches Historisches Museum, Other contributor, Germany	3798_ECHA_Blei(english)_DHM.pdf	
3801 2022/04/26	Městská část Praha 1, Regional or local authority, Czech Republic	3801_Žádost o Výjimku pro používání olova - Helsinky.pdf	
3804 2022/04/26	Individual, Germany	3804_Brief_ECHA.docx	
3805 2022/04/26	Individual, France	*Confidential attachment removed*	
3806 2022/04/26	Glaserei Gärlich GmbH, Company, Germany	3806_Ausnahmeregelung für die Verwendung von Blei-H.pdf	
3807 2022/04/26	Kantonale Denkmalpflege Basel-Stadt,	3807_BRF European Chemicals Agency 2022-04-26.pdf	

	Regional or local authority, Switzerland		
3808 2022/04/26	Individual, France	L'interdiction du plomb dans mon métier signifierait un arrêt total de mon travail donc de mon savoir-faire acquis par de longues heures de labeur et de mes revenus. Ça serait aussi et surtout la disparition d'un métier aux couleurs translucides inimitables.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.6. Socio-economic benefits of continued use**
3809 2022/04/26	Individual, France	3809_lettre_consultation_plomb.pdf	
3812 2022/04/26	Individual, France	Pour continuer à exercer mon métier, je dois utiliser ce produit, sans cela, je ne pourrait plus faire mon métier tel que je l'envisage. *Confidential attachment removed*	Please see response to comment # 3805
3813 2022/04/27	Individual, United Kingdom	3813_Letter to The European Chemicals Agency (ECHA) 26.4.22.pdf	
3814 2022/04/27	Glas in Lood Groningen, Company, Netherlands	*Confidential attachment removed*	
3816 2022/04/27	Individual, France	*Confidential attachment removed*	
3819 2022/04/27	Stiftung Basler Münsterbauhütte, National NGO, Switzerland	3819_BRIE_English1_Bleiverbot-Protest-EU-Helsinki_2022.04.27_BBAH.pdf	
3820 2022/04/27	EppsteinFOILS GmbH, Company, Germany	LAD and sunset date would lead to regrettable effects and are not very reasonable goals for a chemical element which is unavoidable.	**B.1.2. Aspects not considered by ECHA when proposing latest application**

			dates / sunset dates B.1.2.2. Lack of alternatives, socio-economic aspects
3821 2022/04/27	Individual, United Kingdom	3821_EN-Sample-letter-stained-glass-and-lead-template-letter.pdf	
3822 2022/04/27	Individual, Germany	3822_Brief_zur_freien_Verwendung_Aenderung_ECHA.pdf	
3823 2022/04/27	Individual, United Kingdom	3823_ECHA letter.pdf	
3824 2022/04/27	ARCOVE. Asociación para la Restauración y Conservación de Vidrieras de España, National NGO, Spain	3824_EN Sample letter stained glass and lead.pdf	
3825 2022/04/27	Akademisches Kunstmuseum Bonn, Academic institution, Germany	*Confidential attachment removed*	
3826 2022/04/27	Akademisches Kunstmuseum Bonn, Academic institution, Germany	*Confidential attachment removed*	
3828 2022/04/27	LK Systems AB, Company, Sweden	3828_LK Systams AB Comments to ECHA Annex XIV Lead.pdf	
3829 2022/04/27	Individual, Netherlands	3829_Glasatelier Oud Rijswijk protest.docx *Confidential attachment removed*	
3832 2022/04/27	ICOMOS Austria, International NGO, Austria	3832_ECHA_Lead-Exeption_ICOMOS-Austria_O-Malley.pdf	
3833			

2022/04/27	Initiative Kulturgut Mobilität e.V., National NGO, Germany	3833_Zulassungspflicht für Blei - EN.pdf	
3834 2022/04/27	Individual, Germany	*Confidential attachment removed*	
3835 2022/04/27	Individual, Italy	It takes at least 60 months to find a valid alternative	**B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates B.1.2.2. Lack of alternatives, socio-economic aspects**
3836 2022/04/27	Federal Monuments Authority, National Authority, Austria	3836_ECHA.pdf	
3837 2022/04/27	Schwing GmbH, Company, Austria	The latest date is depending on develop alternativ technologies to realise the hard choming prozess (or the neccercerd surfaces properties).	**B.1.2.2. Lack of alternatives, socio-economic aspects**
3838 2022/04/27	Evangelisch-Lutherische Kirche in Norddeutschland, Baudezernat, Standort Greifswald, Other contributor, Germany	*Confidential attachment removed*	
3839 2022/04/27	Individual, Germany	3839_2022-04-27_pa_finnland_einspruch bleiverbot.pdf	
3840			

2022/04/27	HEAPS ARNOLD & HEAPS, Company, United Kingdom	3840_FN27042022.pdf	
3841 2022/04/27	Individual, Germany	3841_Einspruch 1 ECHA .pdf	
3843 2022/04/27	Staatliche Museen zu Berlin - Nationalgalerie - Hamburger Bahnhof, European institution, Germany	*Confidential attachment removed*	
3844 2022/04/27	STMicroelectronics, Company, Switzerland	STMicroelectronics would like to stress that the semiconductor industry has been working on technical issues with programmes for managing and seeking replacements for lead use in semiconductors since the early 2000s through the E3 initiative and the Die Attach 5 Project. However, a replacement for lead in high melting temperature solder in the semiconductor production has not been found yet. Currently, there is no prospect that a replacement will be found in the near future. Consequently, the proposed Latest Application Date will not allow the semiconductor industry to replace lead. Nevertheless, if lead was included in Annex XIV of the REACH Regulation, STMicroelectronics requests that, in light of the highly complex nature of the manufacturing process, the long R&D and investment cycles of the semiconductor industry, the 24-month timeframe would be chosen for the Latest Application Date. 3844_ST Pb Metal ECHA Consultation April 2022 FINAL.pdf	Please see references to responses in section I
3846 2022/04/27	Ernst Architekten BDA, Company, Germany	3846_Einspruch EU-Verbot Blei_ECHA.pdf	
3848 2022/04/27	Endress+Hauser Conducta GmbH+Co. KG, Company, Germany	*Confidential attachment removed*	
3849 2022/04/27	ICOM / ICOM-CC, International NGO, France	• 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; • The effective means of excluding hazards from lead in this area are well known to those professionals handling it; • 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; • The cultural damage of its ban to the European cultural heritage would be inconceivably severe. 3849_ICOM-CC_ECHA_Lead_ICOMOS_ICOM_ECCO.pdf	Please see response to comment # 3585

3851 2022/04/27	Individual, United Kingdom	Please see attached *Confidential attachment removed*	Please see response to comment # 3585
3855 2022/04/27	Deutsche Stiftung Denkmalschutz, Other contributor, Germany	3855_220425 Bleiverbot_ECHA.pdf	
3856 2022/04/27	International Lead Association, and Lead REACH Consortium, Industry or trade association, United Kingdom	It is noted from Industry experience in other sectors, with other substances included in Annex XIV previously, that the feasibility of upstream Applications for Authorisation is often limited. Downstream users may also prefer, from a strategic business perspective, to make their own application instead of relying on the Application for Authorisation submitted by an upstream supplier. How the industries using lead metal would coordinate Applications for Authorisation, in the event that it were included in REACH Annex XIV, has not yet been determined. However, it is envisaged that, in general, users – not lead metal manufacturers/importers – would submit Applications for Authorisation. In a recent survey (Footnote 21) carried out by ILA, just 14 out of 273 respondents indicated that they would expect EU suppliers to apply for upstream Authorisations for their downstream uses. The breadth of industrial uses, particularly in the context of IU6 (Use of lead metal in the production of a range of lead articles), would result in thousands of Applications for Authorisation, if lead metal were included in REACH Annex XIV without exemption. The proportion of SME applicants across all industries applying for Authorisation would also be significant. In the battery value chain alone, a recent study by EBP (Footnote 22) concluded that almost 40% of companies in the European lead battery value chain are SMEs. Per the ECHA document, “Setting Latest Application Dates - Practical implementation document for the Annex XIV entries approach” (Footnote 23), the high number of industrial sites using lead metal in the EU directly impacts the complexity of the EU supply chain and warrants a longer Latest Application Date. The number of Applications for Authorisation would be increased considerably where users only applied for their own uses, not those of their downstream customers: for example, an alloy producer would apply for Authorisation to use lead metal in the formulation of alloys; each of his customers using those alloys to produce articles would apply for Authorisation to make the different (types of) article for different end-use applications. During H1 2022, ILA carried out a survey of downstream users of lead. 273 responses were received from organisations representing a total of more than 27,000 legal entities, including 25 responses from EU associations representing in total more than 16,600 entities, and 219 responses from EU companies representing more than 4,850 entities in total. Respondents were asked to indicate the number of uses per legal entity that would require Authorisation, and the number of entities represented by the response. To estimate a reasonable worst-case number of AfA, a number of assumptions were made (Footnote 21). Of the 273 responses received, 92 responses indicated that the 4,490-plus legal entities represented would apply for Authorisation. Considering that not all entities represented in the survey responses would end up in applying for Authorisation,	**A.2.15 Excessive number of expected AfA to be considered as reason not to recommend lead** **B.1.1. General principles for setting latest application dates/sunset dates** **B.1.1.1. Legal background** **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**

		and analyses of activities may reveal some applications which would also not be in scope of Authorisation (e.g. uses of articles, intermediate uses, etc), a reasonable estimate of the number of AfA might be based on 50% of the entities represented applying for Authorisation, and half the number of uses initially considered relevant. In which case the survey responses suggest there could be between 1,200 and 8,000 AfA submitted for Pb metal. (For a more detailed assessment of the survey responses, please refer to Annex 3 to this response, submitted confidentially.) Even if only half of the applications currently foreseen were realised, it could still result in more than 1,000 Applications for Authorisation for which RAC and SEAC opinions would be required, for which ECHA would need to provide secretariat services, and for which Commission decisions and REACH Committee votes would be required. Adequate time and resources for the scientific committees and decision-makers to consider thoroughly each of those applications in full, and in consultation with relevant experts in the field, is essential in order to avoid regrettable substitution. Regrettable substitution is not only the substitution of a substance or a technology by an alternative which may pose similar or worse risks, but also the substitution by alternatives which are unsustainable from an energy consumption, sourcing, or resource efficiency standpoint, and those which shift or transfer the risk elsewhere. Adequate consideration is therefore especially important in regard to technical performance, hazard properties and exposure potential, and viability of any proposed alternatives – including from a resource demand vs supply perspective and considering the relative ability to supply sustainably, locally and from secondary sources – as well as any indirect consequences. Per Article 58(3), the number of substances included in Annex XIV and the transitional arrangements (i.e. the dates specified under Article 58(1)) must both take into account ECHA's "capacity to handle applications in the time provided for". The extremely high number of Applications for Authorisation anticipated for lead metal is unprecedented – the substance with the highest number of applicants and highest number of uses so far being Chromium trioxide, with its 148 RAC and SEAC Opinions and 98 Commission decisions (Footnote 24). The processing of lead metal Applications for Authorisation would require significantly more resources at ECHA and its Committees, at the Commission, and of Member States. From an Industry perspective, a Latest Application Date of at least 30 months before the sunset date should be recommended, if ECHA decides to continue with a recommendation to include lead metal in Annex XIV; however ECHA should consider its own capacity and resourcing, and that of its committees of Member State representatives, for the anticipated number of AfA and define an appropriate transitional period. 3856_ILA-PbRC_270422.zip *Confidential attachment removed*	**for preparing application (e.g. due to high number of users) B.2.01. Request extra long LAD B.2.02 Difficulty / time needed to prepare joined AfAs and uncertainty whether authorisation will be granted 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 C.1.3. Aspects not justifying an exemption from authorisation**
3857 2022/04/27	Deutsche Stiftung Denkmalschutz, National NGO, Germany	3857_220425 Bleiverbot_EuropaeischeKommission.pdf	

3858 2022/04/27	Individual, United Kingdom	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. 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. 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. 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. 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 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. This ban would severely and adversely affect the livelihoods of ironwork conservators and blacksmiths not only in Europe but throughout the world. We strongly urge the European Commission to exclude the use of lead in the conservation of ironwork from its proposed ban. With best wishes,	Please see references to responses in section I
3859 2022/04/27	KEUCO GmbH & Co. KG, Company, Germany	- Should lead be included in Annex XIV of REACH, the sanitary appliances sector would need sufficient time to organise as a high number of potential applicants from our industry is to be expected. [Indeed, according to the European Drinking Water association, around 5000 companies manufacture finished products in contact with drinking water, most of which are SMEs. The products include notably pipes, fittings, water storage systems, measurement apparels as well as taps and sanitary appliances.] - Additional to this, the recycling supply chain needs to be involved in any type of process change as they will be heavily affected by any change in the composition of the brass /red brass material. - Most of sanitary appliances are produced from metallic alloys. Indeed, the JRC MEErP Preparatory Study on Taps and Showers (2014) provides that 90-99% of the taps produced in Europe are made mostly of brass.	Please see response to comment # 3752

		- Should lead be included into Annex XIV of REACH, downstream users of brass alloys in the sanitary appliances sector may choose to submit applications individually or jointly. - If applications are made individually, a high number of submissions should be expected. - Should the industry decide to submit joint applications, experience has shown that these are often less documented as companies would have to face issues related to the compilation of individual data into combined information which are de facto less representative. Experience has also shown that joint applications often result in shorter review periods and hence earlier review reports for ECHA to process. - In both cases, an application for authorisation by this industry, mostly composed of SMES will induce a high burden of workload both for the authorities and companies. - To overcome the intrinsic disadvantage of joint applications, solid and time consuming collaboration needs to be developed between the applicants taking into account IP and confidentiality concerns. Our company would therefore request that longer transitional arrangements are applied to allow companies in the sector and the supply chain, sufficient time to organise in order to maximise the quality of submissions. *Confidential attachment removed*	
3861 2022/04/27	ACRE, Other contributor, Spain	3861_CARTA VIDRIERAS PLOMO.pdf	
3862 2022/04/27	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3862_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Thank you for your opinion.
3863 2022/04/27	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3863_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3864 2022/04/27	SARL VITRAUX MAX &CO, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3864_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3865	DYGA Vitraux,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short.	

2022/04/27	Company, France		Please see response to comment # 3862
3866 2022/04/27	van veerdegem-vosch sprl, Company, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3866_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3867 2022/04/27	carpe diem arts verriers, Company, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3867_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862
3868 2022/04/28	JLA VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3868_2022.04.25. - CNSV - Réponse consultation ECHAContribution Anglais.pdf	Please see response to comment # 3862
3869 2022/04/28	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3869_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3870 2022/04/28	Individual, Germany	general request to exemption 3870_Lead_ECHA.pdf	
3871 2022/04/28	IBEDA Sicherheitsgeräte und Gastechnik GmbH & Co. KG, Company, Germany	see attachment 3871_Stellungnahme zur ECHA-Empfehlung Blei in REACH Anhang XIV aufzunehmen.pdf	Please see references to responses in section I
3873 2022/04/28	Leenders Glas in Lood, Industry or trade association,	 3873_Voorbeeldbrief_aan_ECHA_Europese_commissie (1) (005).docx	

	Netherlands		
3874 2022/04/28	Ademco 1 GmbH, Mosbach, Company, Germany	If lead will be listed in REACH Annex XIV the industry need time to change products and use complaint lead-free materials. Most fittings and valves are made off brass with lead content more than 0,3%. In case the actual brass material cannot be used any longer, the recycling of the material nedd also to be taken into account, because the mixing of leadfree and normal brass material is not allowed and and need to be managed. Most of the products are certified by DVGW or similar certification body and need to be tested and certified in case of material changes. This can overload the test-capacity of the laboratories. The situation is well known by the actual overload of test laboratories caused by the implementation of new UBA-regulations for materials in contact with drinking water. If many manufacturer are requesting approval for brass material according REACH this may also overload the test laboratories and notified bodies. We propose a transitional time of at least 4 years. The UBA regulations are with transitional periode of 2 years and it is not enough to allow the test laboratories to work on all testrequest on time.	**B.1.2.2. Lack of alternatives, socio-economic aspects** **B.2.06 Align LAD/Sunset date with DWD timelines for lead**
3875 2022/04/28	ICOMOS Denmark, National NGO, Denmark	3875_ECHA's plan to include lead in the list of substances subject to authorisation_ICOMOS DK.pdf	
3876 2022/04/28	Ateliers Jean Salmon, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3876_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Français.pdf	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 3877_VDMA SDG Statement ECHA Lead 202204_25.pdf	Please see response to comment # 3871
3879 2022/04/28	J H Porter & Son Ltd, Company, United Kingdom	*Confidential attachment removed*	
3880 2022/04/28	Marie Grillo- Atelier La Couleur du Verre, Company, France	If lead were to be registered, stained-glass makers would need a much longer transitional period than the one currently mentionned.	Please see response to comment # 3862
3881	Individual, Germany	3881_220427_vdr_blei_ECHA.pdf	

2022/04/28			
3882 2022/04/28	Individual, Germany	3882_ban on lead.pdf	
3883 2022/04/28	Verre Claire, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3883_2022.04.25. - CNSV - Re¦üponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3884 2022/04/28	FRANCE VITRAIL INTERNATIONAL , Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3884_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3885 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3885_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3886 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3886_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3887 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3887_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3888 2022/04/28	Keramikerinnung Bayern, Ceramist Guild Bavaria, Industry or trade association,	3888_Stellungnahme Bleiverbot.pdf	

	Germany		
3889 2022/04/28	Francéclat, FITHM, BOCI and UFBJOP, Industry or trade association, France	3889_ECHA's draft recommendation for inclusion of lead in the Authorisation List.pdf	
3890 2022/04/28	Individual, France	If lead had to be registered, the deadlines for stained glass are much too short. 3890_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	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 3891_2022-04-26 ECHA, lead, Hansgrohe EN Public.pdf *Confidential attachment removed*	Please see references to responses in section I
3892 2022/04/28	Individual, Belgium	3892_xxx.docx	
3893 2022/04/28	Individual, France	If ever the lead to be registered, the deadlines for the stained glass window are much too short 3893_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3894 2022/04/28	Atelier Veyrier du Muraud, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3894_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3895 2022/04/28	ATELIER BOEL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3895_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3896 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass windows are much too short 3896_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
3897 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3897_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3898 2022/04/28	Individual, France	3898_lettre_consultation_plomb Ateliers d'Art de France.pdf	
3899 2022/04/28	SARL LES MAITRES VERRIERS RENNAIS, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3899_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3901 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3901_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3902 2022/04/28	Lëtzebuerger Denkmalschutz Federatioun asbl, National NGO, Luxembourg	3902_European Chemicals Agency (ECHA).docx	
3903 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3903_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3904 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3904_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	

			Please see response to comment # 3862
3905 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3905_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3906 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3906_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3907 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3907_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3908 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3908_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3910 2022/04/28	Ondernemers Vereniging van Glazeniers, Industry or trade association, Netherlands	 3910_OVG aan ECHA.pdf *Confidential attachment removed*	
3912 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3912_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3913	Individual,	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/28	France	3913_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3914 2022/04/28	LVR-Fachbereich Regionale Kulturarbeit, Regional or local authority, Germany	3914_ECHA-Finland.pdf	
3915 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3915_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3916 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3916_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3917 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3917_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3918 2022/04/28	Museum am Rothenbaum, Künste und Kulturen der Welt, Other contributor, Germany	3918_Anfrage zur Ausnahme ECAH_2022 .docx	
3919 2022/04/28	Atelier Vitrail France, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3919_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3920	Individual,	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/28	France	3920_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3921 2022/04/28	Rostock Museum for Culture and history (Kulturhistorisches Museum Rostock), Regional or local authority, Germany	3921_xR45HM003.A45.RHS.ADMINHRO_220428-112020-150b.pdf	
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 3922_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3923 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3923_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3924 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3924_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3925 2022/04/28	Bund Deutscher Orgelbaumeister e. V. (BDO), Industry or trade association, Germany	Since only a long-term derogation can ensure the continued existence of the pipe organ in Europe, the length of the transitional periods is not decisive. 3925_Lead-on-REACH_Statement_Association-of-German-Organ-Builders.pdf	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives,**

			socio-economic aspects
3926 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3926_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3927 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are way too short. 3927_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3928 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3928_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3929 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3929_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3930 2022/04/28	UNION DES ENTREPRISES DE PROXIMITE (U2P), Trade union, France	oIf ever the lead had to be registered, the deadlines for the stained glass window are much too short 3930_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3931 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained-glass window are much too short 3931_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3932	Individual,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/28	France	3932_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3933 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3933_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3934 2022/04/28	mustarts, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3934_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825 (7).zip	Please see response to comment # 3862
3935 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3935_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3936 2022/04/28	Vitraux Flores, Company, Belgium	If ever the lead had to be registred, the deadlines for the stained glass windows are much too short 3936_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3937 2022/04/28	Individual, Switzerland	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3937_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3938 2022/04/28	atelier vitrail du chambon, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3938_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825 (1).zip	Please see response to comment #

			3862
3940 2022/04/28	Individual, Netherlands	3940_220428 ECHA - objection signed.pdf	
3941 2022/04/28	Individual, France	if ever the lead had to be registred, the deadlines for the stained glass window are much too short	Please see response to comment # 3862
3942 2022/04/28	Forschungsstelle DIGITAL ORGANOLOGY am Musikinstrumentenmuseum der Universität Leipzig, Academic institution, Germany	3942_ECHA 20220428.pdf	
3943 2022/04/28	Individual, 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
3944 2022/04/28	Jan Matejko Academy of Fine Arts in Krakow, Academic institution, Poland	3944_scan_comment letter.pdf	
3945 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3945_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3946 2022/04/28	Individual, Russian Federation	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3946_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862

3947 2022/04/28	Justus-Liebig-Universität Giessen, Academic institution, Germany	 3947_Lead.docx	
3950 2022/04/28	National Heritage Institute, National Authority, Czech Republic	 3950_Exemption request for the use of lead.pdf	
3951 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3951_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3952 2022/04/28	vincent pascal, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
3953 2022/04/28	Luminescence-Vitraux, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3953_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3954 2022/04/28	ABB Sp. z o.o., Company, Poland	Lifecycle of a product on Motors and Generators is typically 20 years with sparepart availability to be ensured years after EOL of product range. Manufacturing units would required extensive amount of time to ensure that whole logistics and value chain can reach a lead free status beginning from production of raw materials to parts used in assembly process. Manufacturing units would need to have 10 years of LAD and sunset time to ensure availability of lead free parts from both 3rd parties and suppliers. Additionally any new part or logistics chain alteration would require extended work to approve, implement and verify new parts and recertify products on various regulations and standards. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
3957	Liberty Stained Glass Conservation,	 3957_1 EN stained glass and lead letter.pdf	

2022/04/28	Company, United States of America		
3958 2022/04/28	La Cabane du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3958_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3959 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained-glass window are much too short 3959_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3960 2022/04/28	DES IDEES EN VERRE, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3960_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3961 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3961_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3962 2022/04/28	Confédération Française des Métiers D'Art , Trade union, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3962_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3963 2022/04/28	Terre de verre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3963_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3964	glaswerkstatt-s, Company,	 3964_CCF_000343.pdf	

2022/04/28	Germany		
3965 2022/04/28	Glasmuseum Wertheim e.V., Other contributor, Germany	 *Confidential attachment removed*	
3966 2022/04/28	Fédération du cristal et du verre , Trade union, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3966_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3968 2022/04/28	verra carlota, Company, France	If ever the lead had to be registered ,the deadlines for the stained glass window are much too short 3968_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3969 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3969_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution.pdf	Please see response to comment # 3862
3970 2022/04/28	Atelier LE BLOAS, Arts du vitrail et de la laque , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3970_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3972 2022/04/28	pauline galindo vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3972_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
3973 2022/04/28	Vereinigung der Landesdenkmalpfleger in der Bundesrepublik Deutschland,	 3973_VDL_Stellungnahme_BRPH_26.05.2021_RD.docx	

	National Authority, Germany		
3974 2022/04/28	Confederatie Bouw - Aannemers van glaswerken, Industry or trade association, Belgium	3974_CB glaswerken1.pdf	
3975 2022/04/28	Confédération Construction - Entrepreneurs de vitrage, Industry or trade association, Belgium	3975_CC vitriers 1.pdf	
3976 2022/04/28	Mad'in Europe, Company, Belgium	3976_Stained glass and lead template letter.pdf	
3977 2022/04/28	Individual, Belgium	3977_Jan Jacobs1.pdf	
3978 2022/04/28	Individual, Belgium	3978_AGC1.pdf	
3979 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3979_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3980 2022/04/28	Peterborough Cathedral, Regional or local authority, United Kingdom	*Confidential attachment removed*	
3981 2022/04/28	Individual, Belgium	3981_Foubert1.pdf	
3982 2022/04/28	Individual, Belgium	3982_Gijbels Glas1.pdf	

3983 2022/04/28	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 3983_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3984 2022/04/28	Individual, Belgium	 3984_Hermans1.pdf	
3985 2022/04/28	ICOMOS-UK , National NGO, United Kingdom	No comment 3985_20220427_ECHA_Lead_ICOMOSUK_final.pdf	
3986 2022/04/28	Individual, Belgium	 3986_Renover1.pdf	
3987 2022/04/28	Individual, Belgium	 3987_Vloebergsglas1.pdf	
3988 2022/04/28	Maison De L'Imprimerie, Other contributor, Belgium	 3988_recom_com_call_for_info_questionnaire_en Questionnaire plomb.docx	
3989 2022/04/28	ICOMOS-UK, National NGO, United Kingdom	No comment 3989_20220427_ECHA_Lead_ICOMOSUK_final.pdf	
3990 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glas window are much too short 3990_2022.04.25. - CNSV - Réponse consultation ECHA - Contribu tion Anglais.pdf	Please see response to comment # 3862
3991 2022/04/28	Glasfachschule Zwiesel - Staatliches Berufliches Schulzentrum für Glas, Other contributor, Germany	 *Confidential attachment removed*	
3992 2022/04/28	Individual, Belgium	 3992_KockenA.pdf	
3993	La Maison du Vitrail, Company,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3993_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/04/28	France	*Confidential attachment removed*	Please see response to comment # 3862
3994 2022/04/28	Crea.PLan GmbH, Company, Germany	3994_Helsinki.pdf	
3995 2022/04/28	STEF VALENTI, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3995_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3996 2022/04/28	STEF VALENTI, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3996_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3997 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3997_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
3998 2022/04/28	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
3999 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 3999_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4000 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4000_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4001 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4001_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4002 2022/04/28	ABB Oy, Company, Finland	Lifecycle of a product on Motors and Generators is typically 20 years with spare part availability to be ensured years after EOL of product range. Manufacturing units would required extensive amount of time to ensure that whole logistics and value chain can reach a lead free status beginning from production of raw materials to parts used in assembly process. Manufacturing units would need to have 10 years of LAD and sunset time to ensure availability of lead free parts from both 3rd parties and suppliers. Additionally any new part or logistics chain alteration would require extended work to approve, implement and verify new parts and recertify products on various regulations and standards. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
4003 2022/04/28	Office of the President of the Czech Republic, National Authority, Czech Republic	4003_zakova_220427-131104-38d.pdf	
4004 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4004_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4005 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4005_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4006 2022/04/28	ATELIER STAINED GLASS, Company, France	Deadline for stained glass window is way too short if " LEAD" has to be registered. 4006_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4007 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4007_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4008 2022/04/28	Renaissance du Vieux-Lyon, National NGO, France	If lead had to be registered, deadlines for stained glass window are much too short and threaten a whole part of our heritage (french cathedrals, art nouveau/tiffany works, etc.) 4008_2022.04.25.-CNSV-ReponseconsultationECHA.pdf	Please see response to comment # 3862
4010 2022/04/28	vitraux d'Isabeau, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4010_Sans nom 1.pdf	Please see response to comment # 3862
4011 2022/04/28	FANY GLASS, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4011_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4012 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained-glass window are much too short 4012_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4013 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glasse window are much too short 4013_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4014 2022/04/28	Verre et Vitrail - Clotilde Gontel, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4014_lettre_consultation_plomb-aaf.pdf	Please see response to comment # 3862
4015 2022/04/28	Verre et vitrail - Aurélie Dupin, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4015_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4016 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4016_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4017 2022/04/28	Art'lekin, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4017_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4018 2022/04/28	Bistanclak, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4018_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4019 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4019_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4020 2022/04/28	German Association of the Automotive Industry (VDA) , Industry or trade association, Germany	4020_VDA_Blei Position für die Kommission_recom_com_call_for_info_questionnaire_en_final.pdf	
4021 2022/04/28	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4021_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4022 2022/04/28	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4022_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	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!	Please see references to responses in section I
4024 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4024_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4026 2022/04/28	EAFC THUIN , Academic institution, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4026_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4027	VITRAUX IMBERT , Company,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4027_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/04/28	France		Please see response to comment # 3862
4028 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4028_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4029 2022/04/28	Creative Retreats and Holidays, Company, United Kingdom	Lead can never be substituted as a material for the creation of stained glass panels, both as lead came (strips) and in lead solder. Artists such as myself are quite capable of taking appropriate heath and safety measures for both ourselves and the environment. The end date for the use of lead in stained glass should be when the earth ceases to exist and no soner.	Please see response to comment # 3585
4030 2022/04/28	SEVERINE GUESSANT, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4031 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4031_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4032 2022/04/28	AUDREY PITOT VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for stained glass window are much too short 4032_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4033 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4033_2022.04.25. - CSNV - Comment soumettre sa contribution.docx *Confidential attachment removed*	Please see response to comment # 3862

4034 2022/04/28	De Verre et De Plomb Lelia Montanari, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4034_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4035 2022/04/28	atelier de vitrail, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short b) 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), 4035_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4036 2022/04/28	Philidet Verre, Company, French Guiana	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4036_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862
4037 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4037_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4038 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4038_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4039	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4039_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/04/28		*Confidential attachment removed*	Please see response to comment # 3862
4040 2022/04/28	MBOULAY Atelier Vitrail Le Cygne, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4040_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4041 2022/04/28	UP+L Consult SRL - Atelier Chant de Lumière , Company, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4041_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4042 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4042_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4043 2022/04/28	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4043_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4044 2022/04/28	Olivier Delalande Architecte, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4044_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4045 2022/04/28	ASD-EUROSPACE, Industry or trade association, France	Based on our comments above on prioritisation results and general issues we believe that lead should not be recommended for Annex XIV inclusion. Therefore, the following comments on the proposed Latest Application Dates (LAD) and Sunset Dates are only made as a precaution: ECHA proposes the standard LAD slots of 18, 21 and 24 months from the date of inclusion in Annex XIV and 18 months after the LAD as a sunset date.	Please see references to responses in section I

		As far as the Space Sector is concerned, the supply chains are very complex and it will be challenging to define a viable strategy for applications for authorisation (AfAs) covering all operators, including many SMEs. For soldering, which would require the majority of AfAs for our sector, the entire complex EU space systems supply chain would be impacted, including the primary metal producer, the solder paste supplier, manufacturer of each independent element (component, printed circuit, alloy, cable), distributor and assembler of all these parts (internally or with a subcontractor). Space companies as assemblers are located at the end of the long supply chain; they are also downstream users of solder paste, especially for PCBs. They are found on most satellites; industry buys them and sometimes solders on them. All European PCB manufacturers as well as satellite motherboard manufacturers are concerned. Hence, upstream operators (e.g. the solder paste producer, PCB manufacturers) would also have to apply for their own uses, because these cannot be covered by Downstream Users. Based on information from ESA and Eurospace, the total number of AfAs required only in the European Space Sector and only for lead-based soldering activities (including subcontractors) could go up to 200 or more AfAs. This estimate does not even include uses subject to authorisation by upstream operators outside the European Space Sector (e.g. soldering by PCB manufacturers, solder paste formulation) and other than soldering uses. Hence, the total number of AfAs may be even higher (see further details in the response to question 29 of our response to COM, ref. MPTB-ES-PO-0099). It is expected that all or at least the vast majority of the mentioned sites/soldering processes will require an AfA for continued operations as there will be no alternative in place at the expected Sunset Date. The challenges of upstream authorisation for Cr(VI) would thus be exacerbated for lead, which has a higher diversity of uses and soldering activities are very site specific. In addition to soldering, AfAs may be needed (not exhaustive) for other uses of lead for space applications, such as Pb coating for lubrication, other alloys used as “mixtures” and containing lead above the relevant limit, lead in adhesives or as addition in chemical-nickel electrolyte, unless alternatives are implemented successfully before a sunset date. Also here, space companies would be reliant on upstream operators, including downstream users who process raw materials (still) qualifying as mixtures. Given the uncertainties encountered with upstream AfAs in the chromates case on the one hand and the multiple use steps in the supply chain leading to the production of lead-containing articles and complex objects on the other hand we expect that a “hybrid” AfA strategy will be needed, including - Individual DU AfAs by many companies in the Space Sector to cover their own uses; and - AfAs further upstream, e.g. by formulators of solder paste or (other) producers of raw materials qualifying as “mixtures” and containing lead as a component	Please see response to comment # 3856

		Sector-level cooperation to prepare core dossier elements for an AfA (e.g. AoA, SEA) and collaborate with upstream actors (e.g. formulator) would need to be considered too. In summary, the latest possible LAD (24 months or later) would need to be chosen for lead. 4045_MPTB-ES-PO-0103_LTF response to ECHA_28APR2022.pdf	
4046 2022/04/28	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4046_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4047 2022/04/28	Atelier de Vitrail - C. BEAUBREUIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4047_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4048 2022/04/28	Margotak, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4048_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4049 2022/04/28	Historisches Museum Basel, Academic institution, Switzerland	 *Confidential attachment removed*	
4050 2022/04/28	L'ENERGIE DES COULEURS, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4050_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4051 2022/04/29	Individual, Germany	 4051_Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern.pdf *Confidential attachment removed*	
4052 2022/04/29	Vitraux Ans, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4052_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4054 2022/04/29	Atelier de Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4054_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4055 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4055_2022.04.25 - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4057 2022/04/29	SARL STEF ATELIER, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4057_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4058 2022/04/29	Individual, Germany	 4058_Bleiverglasung EU.pdf	
4059 2022/04/29	chambre syndicale national du vitrail, Academic institution, France	 4059_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Fran├ºais.pdf *Confidential attachment removed*	
4060 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4060_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4061 2022/04/29	Istainedglass, Company, Netherlands	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4061_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4062 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4062_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4063 2022/04/29	ATELIER LA BOHEME, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4063_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4064 2022/04/29	pascaline bonnet, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4064_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4065 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4065_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4066 2022/04/29	SEBISOLE, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4066_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4067 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4067_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4069 2022/04/29	Académie royale des Sciences, des Lettres et	 4069_20220428161808076.pdf	

	des Beaux-Arts de Belgique, Academic institution, Belgium		
4070 2022/04/29	Stichting Oude Groninger Kerken, National NGO, Netherlands	4070_ECHA's plan to include lead in the list of substances subject to authorisation - Letter.pdf	
4071 2022/04/29	école suisse de vitrail et création - monthey, Company, Switzerland	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4071_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4072 2022/04/29	Atelier de Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4072_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4073 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 4073_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4074 2022/04/29	Kongsberg Defence & Aerospace AS, Company, Norway	With the coming changes to the REACH regulation, and revision of the authorisation process, applicants as well as ECHA will need time to adapt to the changes in order to ensure the quality of an application. On the basis of this argument, Kongsberg Defence & Aerospace AS suggests a LAD of 24 months.	**B.2.05 Due to REACH review more time needed to prepare AfA**
4075 2022/04/29	Renotec nv, Company, Belgium	*Confidential attachment removed*	
4077 2022/04/29	sinclair martin architecte, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4077_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4079 2022/04/29	RUAG Ammotec GmbH, Company, Germany	4079_Consultation Input RUAG Ammotec.zip *Confidential attachment removed*	
4080 2022/04/29	Atelier Christalyde, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4080_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4081 2022/04/29	Individual, Germany	4081_Lead EC Number 231-100-4.pdf	
4082 2022/04/29	Individual, France	4082_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4083 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 4083_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4085 2022/04/29	Atelier Bassinot, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4087 2022/04/29	Individual, France	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 I- Context 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	Please see response to comment # 3862

		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. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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.	

		• 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. 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? 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. 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. 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. 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. 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. 4087_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
4090 2022/04/29	Atelier les ailes de verre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4090_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4091 2022/04/29	Hessisches Landesmuseum Darmstadt, Other contributor, Germany	 4091_ECHA.pdf	
4092 2022/04/29	ICOM Austria - Austrian National Comittee of the International Council of Museums, National NGO, Austria	 4092_Brief_Blei_EK_29042022.pdf	
4093 2022/04/29	ARCHITECTES DU PATRIMOINE, Trade union, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4093_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4094 2022/04/29	ICOM Germany, National NGO, Germany	 *Confidential attachment removed*	
4096 2022/04/29	FV Metalltechnische Industrie, Industry or trade association, Austria	For our industry lead is a key substance: 1. Functional properties of alloys e.g., in metal cutting manufacturing 2. Enabling galvanic processes (anodes) 3. Wire and cable sheathing 4. Allowing counterweights in the necessary dimensions within smaller volumes 5. Use in other galvanising processes such as hot-dip galvanising (boiler protection) All this sectors are producing green products and support circular economy. If lead would be included in Annex	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.5. Availability of**

		XIV many products could not be produced anymore. For many processes we do not have any substitutions on an industry level at the moment. If an inclusion of lead in Annex XIV would happen we need at least 10 years to substitute lead in special sectors (LAD and Sunset Date). For lead in alloys we do not see any substitution at the moment. We would please not to include lead in Annex XIV of REACH.	**suitable alternatives** **A.2.18 Essential role of lead metal for Green Deal and circular economy** **B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4097 2022/04/29	Atelier ArP' SARL d'architecture, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4097_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4098 2022/04/29	Atelier Wolinski, Company, 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
4099 2022/04/29	Germany, Member State	4099_20220429093645192.pdf	
4100 2022/04/29	Kludi GmbH & Co. KG, Company, Germany	Lead is currently regulated in two areas that influence each other: REACH Annex XIV and EU Drinking Water Directive (positive list of metals). Only alloys that have been tested for the release of metals (lead) are included in the 4MS list for metal materials. If the chemical composition were to change, approx. 50% of the existing materials would have to be tested again. The list published in January 2025 would be binding from January	**B.1.2.2. Lack of alternatives, socio-**

		2027. An inspection analogous to (EU) No. 305/2011 according to the system 1+ is planned. At least 5 - 6 years after inclusion in Annex XIV are required to test the lead-reduced alloys. This must be taken into account on the sunset date. 4100_Kommentierung_Blei_Public_EN.pdf *Confidential attachment removed*	**economic aspects** **B.2.06 Align LAD/Sunset date with DWD timelines for lead** Please see references to responses in section I
4101 2022/04/29	Inès Sahli - Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4101_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4102 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 4102_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4103 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4103_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4104 2022/04/29	Individual, France	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 I- CONTEXT 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-	Please see response to comment # 3862

		how and would condemn whole sections of European heritage. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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.	

		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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. - 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. 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? 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. 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. 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. 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.	

		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. 4104_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
4105 2022/04/29	Ateliers d'Art de France, Trade union, France	4105_Contribution d'Ateliers d'Art de France.pdf	
4106 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4106_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4107 2022/04/29	Danielle Burguion Design, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4107_CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	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	See the attached pdf file. The text includes tables and references and these did not copy/paste well to the webform text box 4108_Calder Group comments to ECHA public consultation 28042022.pdf	
4110 2022/04/29	Olivier SALMON Architecte SASU - ACMH, Company, France	4110_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
4111 2022/04/29	Atelier Le Metayer Bessac, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4111_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4113	Arbeitsgemeinschaft Oberflächentechnik,	We use lead always as an downstream user and we do not produce lead. Our technologies which require lead are the following:	**B.1.2. Aspects not considered**

2022/04/29	Industry or trade association, Austria	• Enabling galvanic processes (anodes) • Hot dip galvanizing (boiler protection) • Side effect in the anodizing process of aluminium (aluminium alloys containing lead are alkaline pickled before anodized, emission of lead possible) • Functional properties of alloys e.g., in metal cutting manufacturing For the main part of the technologies substitutions are not available on an industry level. If an inclusion of lead in REACH Annex XIV would happen we would need at least 10 years to substitute lead in our processes. In the hot dip galvanizing industry we have already achieved a lead substitution for the larger contract manufacturer plants but not for all inhouse plants.	**by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4114 2022/04/29	Europacable AISBL, Industry or trade association, Belgium	4114_Europacable - comments to ECHA public consultation - 29 April 2022 .pdf	
4115 2022/04/29	Mairie de Meudon, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4115_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4116 2022/04/29	Individual, Poland	4116_recom_com_call_for_info_questionnaire_2022-04-27_PPUH Autopart Jacek Bąk Sp. z o.o. en.docx.pdf	
4117 2022/04/29	Individual, Poland	4117_recom_com_call_for_info_questionnaire_2022-04-27 Autopart_SA__GB.pdf	
4118 2022/04/29	Individual, France	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 I- CONTEXT 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-	Please see response to comment # 3862

		how and would condemn whole sections of European heritage. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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.	

		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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. - 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. 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? 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. 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. 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. 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.	

		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. 4118_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4119 2022/04/29	lumivitra, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4119_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4120 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4120_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4121 2022/04/29	Individual, France	 4121_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4122 2022/04/29	EGMF - European Garden Machinery industry Federation, Industry or trade association, Belgium	 4122_EGMF comments on inclusion of lead metal in REACH Annex XIV- 29.04.2022.pdf	
4123 2022/04/29	Cour d'Appel de Paris Expert VERRE et VITRAIL, National Authority, 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
4124 2022/04/29	ID VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4124_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4125	Individual,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/29	France	4125_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4126 2022/04/29	IBP Conex Bänninger, Company, Germany	o Pb is technically essential and is needed for the control of many properties in Cu alloys 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 o 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.	Please see references to responses in section I
4127 2022/04/29	Rheinisches Landesmuseum Trier, Other contributor, Germany	4127_ECHA.pdf	
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 references to responses in section I Please see response to comment # 4086
4129 2022/04/29	Birmingham Museums Trust, Other contributor, United Kingdom	4129_Lead letter ECHA.doc	
4130 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained-glass window are much too short 4130_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4131 2022/04/29	Worshipful Company of Glaziers & Painters of Glass, Industry or trade association,	4131_Lead Derogation.docx	

	United Kingdom		
4132 2022/04/29	Audrey fauvey atelier de vitraux, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4132_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4133 2022/04/29	CMA France, Industry or trade association, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4133_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4134 2022/04/29	IBP ATCOSA, S. L., Company, Spain	Pb is technically essential and is needed for the control of many properties in Cu alloys. 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. 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.	Please see references to responses in section I
4135 2022/04/29	Bundesverband der deutschen Musikinstrumenten-Hersteller e. V., Industry or trade association, Germany	4135_BDMH.zip	
4136 2022/04/29	Dornbracht AG Co. KG, Company, Germany	Lead is currently regulated in two areas that influence each other: REACH Annex XIV and EU Drinking Water Directive (positive list of metals). Only alloys that have been tested for the release of metals (lead) are included in the 4MS list for metal materials. If the chemical composition were to change, approx. 50% of the existing materials would have to be tested again. The list published in January 2025 would be binding from January 2027. An inspection analogous to (EU) No. 305/2011 according to the system 1+ is planned. At least 5 - 6 years after inclusion in Annex XIV are required to test the lead-reduced alloys. This must be taken into account on the sunset date. 4136_220428_nc_Kommentierung_Blei._final.pdf *Confidential attachment removed*	**B.2.06 Align LAD/Sunset date with DWD timelines for lead**

4138 2022/04/29	suzie molina , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4138_2022.04.25. - CNSV - Reponse consult ation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4139 2022/04/29	1, 2, 3...Silice!, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4139_2022.04.25._-_CNSV_-_R├®ponse_consultation_ECHA_-_Contribution_Anglais[1].pdf	Please see response to comment # 3862
4141 2022/04/29	Alexandra Giès, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4141_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4142 2022/04/29	chambre syndicale du vitrail, Trade union, France	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 I- CONTEXT 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. 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	Please see response to comment # 3862

		solder the pieces of glass forming a stained glass window. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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. 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 consists of melting the tin around the entire contour of the	

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4143 2022/04/29	Individual, Germany	4143_Stephan Wolf_Einspruch ECHA_SW_20220427.pdf	
4144 2022/04/29	SAG vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4144_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862

4145 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4146 2022/04/29	Individual, Germany	4146_Jonas Jückstock_Exemption request for lead_ECHA.pdf	
4147 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4147_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4148 2022/04/29	Staatliche Verwaltung der bayerischen Schlösser, Gärten und Seen, Regional or local authority, Germany	4148_Kathrin Janis_Exemption request for lead_ECHA.pdf	
4149 2022/04/29	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4149_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	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	4150_ECHA_20220429.pdf	
4151 2022/04/29	ART STAINED GLASS, Company, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4151_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4152 2022/04/29	State Office for Heritage Management and Archaeology Saxony-Anhalt, Regional or local authority, Germany	4152_2022-04-29_LDA-LSA_EU-VErbot von Blei.pdf	
4153 2022/04/29	Kaliber magazine, Other contributor, 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, practically ZERO. The social and economical impact is totally unproportional. We will fight against this ban and WILL NOT COMPLY.	Please see references to responses in section I
4156 2022/04/29	VVDP-ART Comm. V. - Oil Paintings and Stained Glass, Company, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4156_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4157 2022/04/29	ESCRBC de Catalunya, Academic institution, Spain	4157_Letter MMA.pdf	
4159 2022/04/29	Kunstkonserveringen (Art Conservation Center Denmark), Company, Denmark	4159_Brev vedr. brug af bly indenfor konservering og restaureringsfaget SIGNED.pdf	
4160 2022/04/29	Museumsdorf Hösseringen, Academic institution, Germany	4160_Brief_Bleiglas_EU-Agency.pdf	

4162 2022/04/29	TGK, Company, Germany	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4162_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais(0).pdf *Confidential attachment removed*	Please see response to comment # 3862
4163 2022/04/29	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4163_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4164 2022/04/29	EURL VITRAUX DUPUY, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4164_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4165 2022/04/29	Fondation du patrimoine, Academic institution, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4165_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4166 2022/04/29	Bushy Park Ironworks, Company, Ireland	 4166_Petition_Letter_for_Ironworkers.docx	
4167 2022/04/29	Vitrail Naud, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4167_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4169 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4169_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4171	Individual,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/29	France	4171_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais copie.pdf	Please see response to comment # 3862
4172 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4172_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4173 2022/04/29	Individual, France	I- CONTEXT 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. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50.	Please see response to comment # 3862

		4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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.	

		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. 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 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. - 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. 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? 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. 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. 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. 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. 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. 4173_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais copie.pdf	
4174 2022/04/29	créations lepetitfrère, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4174_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4175 2022/04/29	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4175_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4176 2022/04/29	Individual, France	4176_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais copie.pdf	
4177	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4177_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/04/29			Please see response to comment # 3862
4178 2022/04/29	State Office for Heritage Management and Archaeology Saxony-Anhalt, Regional or local authority, Germany	4178_2022-04-29_LDA-LSA Ausnahmeregelung_Blei_Bau- und Kunstdenkmalpflege.pdf	
4179 2022/04/29	L'Art du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4179_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4181 2022/04/29	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4181_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4182 2022/04/29	Individual, France	4182_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais copie.pdf	
4183 2022/04/29	Individual, France	4183_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais copie.pdf	
4184 2022/04/29	La Maison du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4184_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4185 2022/04/29	European Writing Instrument Manufacturer's Association - EWIMA,	4185_EWIMA contribution_ECHA consultation_Pb in Annex XIV.pdf	

	Industry or trade association, Germany		
4188 2022/04/29	Individual, France	Copier-coller le texte ci-dessous en anglais : 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
4189 2022/04/29	Individual, Belgium	4189_Miroiteries Montoises1.pdf	
4190 2022/04/29	GKTECHNIQUES /ESPACE VERRE, Company, France	4190_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4191 2022/04/29	Individual, Belgium	4191_Vigoureux1.pdf	
4192 2022/04/29	Individual, Belgium	4192_Glaswerken Gheysens1.pdf	
4193 2022/04/29	Individual, Belgium	4193_Glaswerken Gheysens1.pdf *Confidential attachment removed*	
4194 2022/04/29	chambre des metiers Haute Marne 52000, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	Thank you for your opinion.
4195 2022/04/29	Individual, Belgium	4195_Van Lierde1.pdf *Confidential attachment removed*	
4196 2022/04/29	GHC Gerling, Holz & Co. Handels GmbH, Company, Germany	When setting the LAD und sunset dates, industry must be given sufficient time to prepare robust applications for authorisation. Considering the wide spread of uses and the complexity of the value chains, a high number of applications are to be expected. To lower the burden of both industry and authorities, joint efforts should be encouraged, which will however require more time. Thus, the LAD und sunset dates should be pushed back as far as possible.	**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** **B.2.01. Request extra long LAD** **B.2.02 Difficulty/time needed to prepare joined AfAs and uncertainty whether authorisation will be granted** **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
4197 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 4197_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4198 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 4198_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4199 2022/04/29	ATELIER DE VITRAIL GWENGLASS, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4199_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4200 2022/04/29	Individual, France	Désolé je n'ai ni la culture informatique, ni anglaise pour faire cette requête. Je suis un simple amateur et réalisateur de vitraux. Finalement avec un tel type de dossier je suis encore plus éloigné de l'Europe que je ne l'imaginais. 4200_Re_ Vitrail patrimoine en danger.zip	Please see response to comment # 3862
4201 2022/04/29	Landesamt für Denkmalpflege Sachsen, National Authority, Germany	 4201_LFD-SRV-PRINTSE_4_ OG_Poststelle_1578_001.pdf	
4203 2022/04/29	Pyrallis srl, Company, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4203_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4204 2022/04/29	Heeresgeschichtliches Museum/Militärhistorisches Institut, Academic institution,	 *Confidential attachment removed*	

	Austria		
4205 2022/04/29	Detection Technology Plc, Company, Finland	No extension of sunset date required, if exemption for medical products is extended to products that require Pb to shield against ionizing radiation. 4205_ECHA proposition to remove LEAD completely.pdf	Please see references to responses in section I
4206 2022/04/29	Peak District National Park, Regional or local authority, United Kingdom	 4206_EN lead letter consultation.docx	
4208 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4208_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4209 2022/04/29	L'atelier du vitrail, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4210 2022/04/29	Smiths Detection Germany GmbH, Company, Germany	 *Confidential attachment removed*	
4211 2022/04/29	LWL-Denkmalpflege, Landschafts- und Baukultur in Westfalen, Regional or local authority, Germany	 4211_AnfrageECHA_LWL.pdf	
4213 2022/04/29	Historical Monuments Research Laboratory, Other contributor, France	 4213_ECHA_Lead_ICOMOS_ICOM_ECCO_lettertemplate_EN92-AMN.docx	
4214 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4214_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4215 2022/04/29	Historical Monuments Research Laboratory, Other contributor, France	4215_recom_com_call_for_info_questionnaire_en_CDC_IL-AMN.docx	
4216 2022/04/29	Individual, United Kingdom	4216_Comments to ECHA regarding proposed EU Regulations on the Use of Lead.doc	
4218 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4218_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4219 2022/04/29	Arums , Company, 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
4220 2022/04/29	Bayerisches Nationalmuseum, Academic institution, Germany	4220_AK Restaurierung_2ECHA.docx	
4221 2022/04/29	Europa Nostra, International NGO, Netherlands	4221_EN-EHA_ECHA Consultation_Lead_29042022.pdf	
4222 2022/04/29	Chambre Syndicale Nationale 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 4222_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4223 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4223_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4224 2022/04/29	BURLET VITRAUX, Company, Switzerland	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4224_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4225 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4225_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4226 2022/04/29	Zentralverband Sanitär Heizung Klima, Other contributor, Germany	 *Confidential attachment removed*	
4227 2022/04/29	ICOM Belgique/Wallonie-Bruxelles, National NGO, Belgium	 4227_ECHA_Lead_ICOM-BWB.pdf	
4228 2022/04/29	ICOM Belgium, National NGO, Belgium	 4228_ECHA_Lead_ICOM-Belgium.pdf	
4229 2022/04/29	WATTELIER Clotilde, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4229_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4231 2022/04/29	Glaswerkstätten F. Schneemelcher, Company, Germany	 4231_Anschreiben an ECHA.pdf	
4232 2022/04/29	Immobilière Champs Elysées, Company,	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4232_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

	France		Please see response to comment # 3862
4233 2022/04/29	Steeltec, Company, Germany	There is no alternative material or machining process available to replace lead in leaded free cutting steel. Several decades of research into a wide variety of possible alternatives have not yielded any commercially viable or widely deployable alternative, therefore even the longest possible sunset date would not allow for the industry to mitigate the multiple negative impacts of a listing in annex XIV. Leaded steel is used in a wide variety of applications, many of which require mandatory external certification over long periods (for example parts used in the automotive industry). These components relying on leaded steel have to be sampled, tested and approved throughout the value chain from the prototype to the series production phase. These processes are costly and resource-intensive (the automotive sector, where risk analyses and failure mode influence analysis require 100'000 km test driving, is a good example). There is a clear and present danger that essential certification processes could be cut short under time pressure, resulting in potential danger to the environment and the public. This is of particular importance as the most commonly discussed alternatives (particularly the most commonly cited potential alternative, Bismuth) are potentially more harmful to the environment and human health than lead. A transition, within the deadlines provided or in the longer term would therefore not be possible. We intend to request that lead in steel alloys for up to a maximum of 0.35% be exempted from the approval requirement, on the basis of the following: • Lead as an alloy in steel is marginal in terms of quantity when compared to the most common uses of lead. Only about 2,500 tonnes of the total lead used in Europe (less 0.2 % of the total processing) are used for steel production. • The use of lead is already subject to an extensive and stringent legal framework at national and EU level. Examples include the the End-of-Life Vehicles Directive (Directive 2000/53/EC), the Restriction of Hazardous Substances Directive (Directive 2002/95/EC) and the Classification, Labelling and Packaging Regulation - Annex VI (Regulation (EC) No 1272/2008). The limits set in these various texts vary between 0.03% for powder material up to 0.35% for steel alloys. We intend to request that these be maintained. • Steel presents particularly high rates of recycling (up to 98% for some types of steel) and the recycling loop is largely closed. The lead content of recycled steel is captured to a large extent in filters and does not leak into the environment in an uncontrolled way. Throughout the production process of leaded free cutting steels, lead-containing filter dusts are specifically returned to the lead cycle via lead recycling. Leaded steel scrap is fed back into the leaded steel production process.	**A.1.5.2. Authorisation is disproportionate and/or means a ban** **A.2.24 Applicability of the authorisation requirement for recycling or recovered materials** **A.2.25 Upfront clarification needed on authorisation requirement for alloys as special mixtures** **B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**

			C.1.1. General principles for exemptions under Art. 58(2) **C.1.3. Aspects not justifying an exemption from authorisation** **C.2.01 Response to requests for exemptions under Art. 58(2) based on existing legislation**
4234 2022/04/29	Society for the Protection of Ancient Buildings, Other contributor, United Kingdom	Please see below 4234_SPAB Comments on Proposed EU Regulations on Lead Use 2022.04.29.pdf	
4235 2022/04/29	Individual, United Kingdom	 *Confidential attachment removed*	
4237 2022/04/29	AU PASSEUR DE LUMIERE, Company, France	If ever the lead hard to ne registered, the deadlines for the stained glass Windows are lunch too short 4237_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4238 2022/04/29	Historisches Museum Basel, Academic institution, Switzerland	 4238_ECHA_Bleiverbot_HMB_20220429.pdf	
4239 2022/04/29	ABB Oy, Company, Finland	The Service life of products is typically 15 years for Variable Speed Drives and 20 years for Motors and Generators. Requirement for spare- and maintenance parts availability is following product Service life period. Service life is	Please see references to responses in section I

		period after serial production has seized following the Life Cycle Management model. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verity the changes against technical design specifications and relevant Regulations, Standards and directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	
4240 2022/04/29	Création de vitraux Marie MAROT-SIX , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4240_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4242 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4242_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4243 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4243_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4244 2022/04/29	Thierry GILHODEZ, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4244_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4245 2022/04/29	Individual, Portugal	If ever the lead had to be registered, the deadlines for stained glass window are much too short. 4245_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4246 2022/04/29	Individual, 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
4247 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 4247_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4248 2022/04/29	Worshipful Company of Blacksmiths, Other contributor, United Kingdom	4248_2020 Letter to Finland.pdf	
4249 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4249_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4250 2022/04/29	Atelier Nicolas Charles, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4250_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4251 2022/04/29	ICOMOS Ireland, National NGO, Ireland	4251_Letter re. ECHA's plan to include lead in the list of substances subject to authorisation (3).pdf	
4252 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4252_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4253 2022/04/29	The British Academy, Academic institution, United Kingdom	4253_BritishAcademy.pdf	
4254 2022/04/29	Deutsches Optisches Museum / German Optical Museum, Academic institution, Germany	4254_20220429_Verwendung von Blei_Europäische Kommission_DOM_ECHA.pdf	
4255 2022/04/29	YXLON International GmbH, Company, Germany	The complexity of supply chain for industrial machines, large stationairy tools and other complex products are too high to an application in 18 months. The special machinery market is very specialised and contains many high-tech SMEs for which such a short deadline is not feasible. The same applies to the Sunset Date. 4255_recom_com_call_for_info_questionnaire_en_29-04-06public.docx *Confidential attachment removed*	**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)**
4256 2022/04/29	HELLA GmbH & Co. KGaA, Company, Germany	LAD: 36 months after inclusion into Annex XIV due to wide spread usage and complex supply chain, creation of several consortia and alignment on authorizations need a suiatble time period. Sunset date: 48 months due to time needed for EU commission to review and grant authorisations. A negative example is Chromium-6 authorisations where no final decision was done by the EU commission before the sunset date. This has created great uncertainties. Futhermore implementation of lead-free alternatives or relocation to Non-EU countries require extensive time due to testing, validation, customer release in industries like automotive.	**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.2.01. Request extra long LAD**

			C.2.16 Compare with Chromates, difficulties with AfA
4257 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4257_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4258 2022/04/29	BIC, Company, France	*Confidential attachment removed*	
4259 2022/04/29	Individual, 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
4260 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4260_2022.04.25. - CNSV - Re╠üponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4262 2022/04/29	Monument Vandekerckhove N.V., Company, Belgium	4262_H20 - The European Chemicals Agency (ECHA) - MG - 29.04.2022 - 084 - Protest.pdf	
4263 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4263_2022.04.25. - CNSV - R--ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4264 2022/04/29	Compagnie des Architectes en Chef des Monuments Historiques, Other contributor,	4264_Note sur le plomb dans le patrimoine.pdf	

	France		
4266 2022/04/29	Individual, United Kingdom	4266_Stained glass and lead letter Appeal FM.pdf	
4269 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 4269_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4270 2022/04/29	Individual, Germany	4270_Zulassungspflicht für Blei deutsch.pdf	
4271 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4271_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4272 2022/04/29	Bayerisches Landesamt für Denkmalpflege, Regional or local authority, Germany	4272_BLfD_AV_Met_JS_objection_lead_ECHA.pdf	
4273 2022/04/29	Daniëlle Merks glas-in-lood atelier, Company, Netherlands	4273_Voorbeeldbrief_aan_ECHA_Europese_commissie.docx.doc	
4274 2022/04/29	Icon (Institute of Conservation), National NGO, United Kingdom	4274_Letter to ECHA 29 April 2022.pdf	
4275 2022/04/29	TERVAS, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4275_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4276	Individual, France	If ever the lead had to be removed, the deadlines for the stained glass window are much too short knowing that there is no substitute material with the same physical characteristics as lead.	

2022/04/29		4276_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4277 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4278 2022/04/29	Individual, France	If ever the lead had to be deposited, the deadlines for the stained glass window are much too short, because no substitute exists with the same physical characteristics of lead. wind resistance, heat expansion, malleability. 4278_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4280 2022/04/29	CLOVIS VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4280_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4281 2022/04/29	MedTech Europe, Industry or trade association, Belgium	Please refer to the attached submission. 4281_MedTech Europe submission Lead REACH Annex XIV.pdf	Please see references to responses in section I
4283 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4283_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4284 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4284_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4285	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/29			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	4286_ECHA_Lead_ICOMOS_ICOM_ECCO_JointStatement_20220426_FR.zip	
4287 2022/04/29	GRA, Company, Germany	4287_Pro-und-Kontra-zum-Bleiverbot.pdf	
4288 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 4288_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4289 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4289_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4290 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4290_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4291 2022/04/29	Driemond Glas, Company, Netherlands	4291_ECHA-loodvrijstelling-Driemond Glas.pdf	
4293	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4293_wetransfer_csnv-reach-consultation-interdiction-du-plomb_2022-04-28_0825(1).zip	

2022/04/29			Please see response to comment # 3862
4294 2022/04/29	LA VITRAILLERIE, Company, 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
4295 2022/04/29	Couleurs et Lumieres, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4295_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	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.	Please see references to responses in section I
4297 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4297_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4298 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4298_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4299 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4299_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4300	Individual, Germany	Ausweichstoffe erfüllen nicht die Anforderungen, die Blei erfüllt. Egal, ob bei Dpietschützen, oder bei der Jagd.	Please see references to

2022/04/29			responses in section I
4304 2022/04/29	Florence Bonazzi stained glass, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4304_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4309 2022/04/29	Asociación Nacional del Arma - ANARMA, National NGO, Spain	 4309_Pro-und-Kontra-zum-Bleiverbot.pdf	
4311 2022/04/29	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4311_2022.04.25. - CSNV - Réponse consultation ECHA - Courrier d'accompagnement-1.pdf	Please see response to comment # 3862
4312 2022/04/29	Individual, Germany	https://german-rifle-association.de/wp-content/uploads/2020/07/Pro-und-Kontra-zum-Bleiverbot.pdf 4312_Pro-und-Kontra-zum-Bleiverbot.pdf	Please see response to comment # 4287
4315 2022/04/29	Individual, Germany	Blei wird für den Schiessport benötigt und ist dort auch völlig ungefährlich. 	**A.1.5.4. Control of risks**
4317 2022/04/29	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4317_CNSV - réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4318 2022/04/29	Individual, Hungary	Please do not implement any of these proposals . 	Thank you for your opinion.
4319 2022/04/29	Individual, Canada	 4319_Stained-glass-and-lead-to-The European Chemicals Agency (ECHA).pdf	
4320		If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/29	julie Bernard (micro entreprise), Company, France	4320_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4321 2022/04/29	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4321_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4323 2022/04/29	Individual, Netherlands	4323_ECHA Brief.pdf	
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 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
4325 2022/04/29	Svensk Armaturindustri, Industry or trade association, Sweden	According to the European Drinking Water Association, around 5 000 companies manufacture finished products in contact with drinking water, most of them being SMEs. This includes pipes, fittings, water storage systems, measurement apparels, taps and sanitary appliances. Most of these sanitary appliances are produced from metallic alloys. JRC MEErP Preparatory Study on Taps and Showers 2014, shows that well over 90 percent of taps produced in Europe are made mostly of brass. If lead is included in Annex XIV of REACH, the industry needs sufficient time to organise since many companies are affected. In addition, the recycling supply chain must be involved as in any change in the composition of the brass material. A rapid transition to new materials generates uncertainties on all levels, including sustainability, service life and water leakage safety. Today we can guarantee lifespans of at least 50 years based on tests and experience. With new materials, manufacturers must find solutions to which there are yet no answers. With lead included into Annex XIV of REACH, downstream users may choose to submit applications individually or jointly. Made individually, we can expect a very high number of submissions. If the industry applies joint submissions these tends to be less documented as companies would have to face issues of compiling individual data into combined information which are de facto less representative. Experience also shows that joint	Please see references to responses in section I

		applications often result in shorter review periods and earlier review reports for ECHA to process. In both cases, authorisations from our industry, mostly composed of SMES will induce a high burden of workload both for the authorities and companies. To overcome the intrinsic disadvantage of joint applications, solid and time-consuming collaborations needs to be developed between the applicants considering IP and confidentiality concerns. We request longer transitional arrangements to allow companies in the sector and the supply chain, sufficient time to maximise the quality of submissions. There is no substitute to lead and manufacturing brass with lead contents well below 0.1 weight percent is not only difficult and costly, but these materials would also become non applicable. To reach our goals on sustainability- and climate footprint we need a technique to purify brass from lead on a commercial level. Research is in progress, but these techniques are still not in place. Authorization does not prohibit the import of articles (forging or foundry raw material) containing lead. We foresee two unpalatable options for our members, one being relocations. If manufacturers can no longer get supplies with suitable raw materials for their products, they will eventually be forced to source from outside the European Union. In the long term, this could cause a relocation of the related production stages, or even worse of the entire production, generating a considerable destruction of know-how and jobs within the European Union, without achieving any additional protection to European consumers. The second is an economic disadvantage. Relocated production, combined with the impossibility of using raw material of recycled origin, leads to a significant increase of the environmental footprint. Considering the mechanisms of the future initiative on sustainable products based largely on this parameter, our members will automatically be penalized, without the slightest possibility of action. 4325_SAI Lead on the REACH authorisation list (Annex XIV)_2022-04-29.pdf	
4326 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 4326_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4330 2022/04/30	Individual, Belgium	 4330_CONTRIBUTION TO THE PROPOSAL MADE BY ECHA TO INCLUDE LEAD IN ANNEX XIV - By Atelier Versicolore.pdf	
4332 2022/04/30	Individual, Germany	 4332_Pro-und-Kontra-zum-Bleiverbot.pdf	
4333 2022/04/30	Individual, Belgium	 4333_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4334	Individual, Germany	As Lead should not be added for ammunition (hunting and sports shooting), this does to my understanding not apply in my case.	Thank you for your comment.

2022/04/30			
4335 2022/04/30	Individual, Belgium	4335_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4337 2022/04/30	Individual, Belgium	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
4339 2022/04/30	atelier federica tarabini, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4339_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4340 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4340_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4343 2022/04/30	Individual, Belgium	4343_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4344 2022/04/30	Individual, Netherlands	total ban is not needed in shooting sports ,everywhere with bullet traps and right ventilation on target ranges ,there is no health issue. or fot the environment	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.3. Use specific considerations**

			A.1.5.4. Control of risks
4347 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4347_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4348 2022/04/30	Hélène Vitali Atelier de vitrail, Company, France	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 I- CONTEXT 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. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 1	Please see response to comment # 3862

		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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. - 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. d) Economic and social, environmental, cultural and societal consequences:	

		Economic and Social : 2 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? 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. 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. 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. 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. 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. 4348_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4349	Individual,		

2022/04/30	Belgium	4349_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4350 2022/04/30	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4350_Fwd_ CSNV - REACH - Plomb - consultation - Réponse et méthodologie.zip	Please see response to comment # 3862
4351 2022/04/30	Individual, Belgium	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
4352 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4352_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4354 2022/04/30	Corpus Vitrearum / ICOMOS, International organisation, Belgium	4354_ECHA_Lead_ICOMOS_ICOM_ECCO_AlettaRambaut.pdf	
4356 2022/04/30	Individual, Belgium	4356_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4357 2022/04/30	S.A.R.L Martin L.G., Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4357_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4358 2022/04/30	Glass-d-art, Company, 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 appropriate protocols are alreay in use within stained glass workshops.	Please see response to comment # 4330

		4. There in no exposure or waste of lead in the environment, as its recycling rate in professional workshops is close to 100%. 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.	
4359 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4359_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4360 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
4361 2022/04/30	atelier Vitro de Carol Frasson Spingardi, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4361_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4362 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4362_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4363 2022/04/30	Individual, Belgium	 4363_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	

4364 2022/04/30	Corpus Vitrearum, International organisation, United Kingdom	*Confidential attachment removed*	
4365 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4365_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4366 2022/04/30	Individual, France	if ever the lead had to be registered, the deadlines for the stained glass window are musch too short 4366_2022.04.25. - CNSV - Re¦üponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4368 2022/04/30	Individual, France	4368_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
4369 2022/04/30	Individual, Luxembourg	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 CONTEXT 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. 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.	Please see response to comment # 3862

		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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. 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. 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? 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. 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. 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. 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. 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. 4369_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais1.pdf	
4370 2022/04/30	Individual, Luxembourg	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	

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4371 2022/04/30	Northrop Grumman LITEF GmbH, Company, Germany	4371_ECHA_Lead-Restriction_Response_Northrop-Grumman-LITEF-GmbH.pdf	
4373 2022/04/30	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4373_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4374 2022/04/30	Individual, Belgium	oIf ever the lead had to be registered, the deadlines for the stained glass window are much too short 4374_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4375 2022/04/30	Individual, Germany	Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern 4375_Bitte um Ausnahmeregelung für die Verwendung von Blei in gestalteten Fenstern S.2.pdf	**C.1.3. Aspects not justifying an exemption from authorisation**
4376 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4376_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4377 2022/04/30	Atypique Création, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4377_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4378 2022/04/30	KunstRegie B.V., Company, Netherlands	 4378_ECHA Ontheffing Lood verwerking KunstRegie 30-04-2022.pdf	
4379 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4380 2022/04/30	lycée lucas de Nehou, Academic institution, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4380_2022.04.25. - CNSV - Réponse consultation ECHA - Contribu_tion Anglais.pdf	Please see response to comment # 3862
4383 2022/04/30	Individual, France	o If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4383_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4385 2022/04/30	Bund Deutscher Klavierbauer e.V. (BDK), Other contributor, Germany	 4385_Fragenkatalog_Musikinstr_gesamt_BDMH De-En.zip *Confidential attachment removed*	
4386 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4386_2022.04.25. - CNSV - Re╠üponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4387 2022/04/30	ASSOCIAZIONE ITALIANA ORGANARI	Any sunset dates for the use of lead of organbuilding would be fatal for the organbuilding trade in Europe. Lead is necessary for making pipes as it is the core to three main points: durability, workability, and sound character. Without lead the organbuilding industry, which is already very small, would be lost forever, together with the	**B.1.2. Aspects not considered by ECHA when**

	(ITALIAN ASSOCIATION OF ORGANBUILDERS), Industry or trade association, Italy	history of pipe organs in Europe. A substitute for lead cannot be found in our trade. 4387_AIO Additional info.pdf	**proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4388 2022/04/30	Individual, Germany	4388_Zulassungspflicht für Blei_30-04-22.pdf	
4389 2022/04/30	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4390 2022/04/30	Germany, Member State	4390_Brief Museum Eisfeld Bleiglasfenster vom 30.04.2022.pdf	
4391 2022/04/30	Individual, 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
4392 2022/04/30	Individual, France	◦ If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4392_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4393 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4393_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4394 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4394_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4396 2022/04/30	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4396_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862
4397 2022/04/30	Individual, Belgium	 4397_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4398 2022/04/30	Individual, France	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 GLAS 4398_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4399 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4399_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4401 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4401_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4402 2022/04/30	Individual, Germany	 *Confidential attachment removed*	
4403 2022/04/30	Individual, Germany	 4403_MJ_Einspruch Bleiverbot ECHA.pdf	
4404		o If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/04/30	SARL Atelier de Vitrail St Joseph, Company, France	4404_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4405 2022/04/30	Individual, Hungary	Dear Sir/Madam, 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. There is no alternative for lead-based bullets for airgun shooting, muzzleloader/reenactment activities and smallbore sportshooting. The overall effect of the metallic lead bullets on the enviroment is negligible, close to zero (excepted wetlands). The social and economical impact is totally unproportional. 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. 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. I will fight against this ban and will never comply. Best regards, Zsolt Darányi	Please see response to comment # 4153
4406 2022/04/30	Verrerie de Saint Just, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4406_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4407 2022/04/30	Individual, France	If ever lead was to be registered under Annex XIV, the deadlines for adaptation would be impossible to meet by the organ building trade.	Please see response to comment #

			3925
4408 2022/04/30	Individual, Germany	 4408_Pro-und-Kontra-zum-Bleiverbot.pdf	
4409 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4409_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4410 2022/04/30	Jégou Vitraux, Company, France	Prohibiting the use of lead on the grounds of its toxicity for the population amounts to excessively favoring the principle of precaution over the principle of use, jeopardizing the survival of thousands of workshops with the know-how of exception and the preservation of whole sections of French and European heritage. 	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban**
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. Die Aussage, dass das Fehlen eines Alternativstoffes kein Grund sei, um das Verbot zu stoppen ist zutiefst undemokratisch. Im Übrigen: Von Sportschießstättten mit Kugelfang geht keine Gefah für die Natur aus. 	Please see references to responses in section I
4413 2022/04/30	SARL Atelier Anne Pinto, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4413_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4414 2022/04/30	International Society of Organbuilders, International organisation,	Because the organbuilding industry is made of small artisans' shops that do not have the means of financing research and development it is unlikely that an alternative can be developed. The length of the sunset period is therefore irrelevant. 4414_ISO- ECHA Lead ban statement.pdf	

	Belgium		Please see response to comment # 3925
4415 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4415_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4416 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4416_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4418 2022/04/30	Individual, 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
4419 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4419_20220425 - CNSV - Réponse consultation ECHA - C_220430_171910.pdf	Please see response to comment # 3862
4420 2022/04/30	Individual, Belgium	4420_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4421 2022/04/30	Individual, Belgium	4421_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4423 2022/04/30	Individual, Belgium	4423_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4424 2022/04/30	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4424_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4425 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
4426 2022/04/30	International Council on Monuments and Sites Wood Committee (IIWC), International NGO, France	See attached letter 4426_20220428_ECHA_Lead_ICOMOS_Wood_Committee_FINAL_EN.pdf	Please see response to comment # 3875
4427 2022/04/30	Individual, Belgium	4427_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4428 2022/04/30	Atelier Berthelot, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much to short 4428_2022.04.25. - CNSV - Reponse consult ation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4429 2022/04/30	Spalding Gentlemen's Society, Other contributor, United Kingdom	4429_letter SGS - Lead 30.04.22.docx	
4430 2022/04/30	Individual, Belgium	4430_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4431 2022/04/30	Les Aventures Verrières, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4431_2022.04.25. - CNSV - Reponse consult ation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4432 2022/04/30	Individual, Belgium	4432_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4433 2022/04/30	Atelier de l'Harmonium, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4434 2022/04/30	Individual, Belgium	4434_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4437 2022/04/30	Individual, Belgium	4437_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4438 2022/04/30	Individual, Belgium	4438_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4439 2022/04/30	Individual, Belgium	4439_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4440 2022/04/30	Individual, Belgium	*Confidential attachment removed*	
4441 2022/04/30	Individual, Belgium	4441_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4442 2022/04/30	Individual, Belgium	4442_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4443 2022/04/30	Individual, Belgium	4443_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4444	Individual, United Kingdom	As above	Please see references to

2022/04/30			responses in section I
4445 2022/04/30	Brussels artistic stained glass, Company, Belgium	Neant	Please see references to responses in section I
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
4450 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4450_2022.04.25. - CSNV - Comment soumettre sa contribution.docx	Please see response to comment # 3862
4451 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4451_2022.04.25. - CSNV - Comment soumettre sa contribution.docx	Please see response to comment # 3862
4453 2022/04/30	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4453_2022.04.25. - CSNV - R├®ponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862
4454 2022/04/30	ACM, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4454_2022.04.25. - CSNV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4457	Individual,		

2022/04/30	Belgium	4457_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4458 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4458_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4459 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4459_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4460 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4460_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4461 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4461_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4463 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4463_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4464 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4464_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4465	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4465_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/04/30			Please see response to comment # 3862
4466 2022/04/30	Le Verre de Voûte, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. It's important to understand that stained glass is a know how based on a 1000 years history. Lost already once, we have developped again its technique in the early XIXth and accomplished the recovery only in the 1980's - not far as two centuries to find the same efficiency as middle Age or Renaissance Period ! Lead offers reliability in time, allows protection against rain, and is easy for restoration. There is very little loss while working with it, and most of it may enter a re-use cycle. About ways of dealing with it, it is necessary to work safely, ond it is suitable to inform about it while studying, and follow seriously the link between best practices and rate of lead traces in blood volume. I declare to be informed about the risks and affirm that I manage it with all my consciousness. Consider that suggesting one other material would declassify all the past and present quality of unvaluable master of art pieces. In other words, prohibiting lead for stained glass would make disappear most of the studios and their very fragile know how. Thank you for having read this comment, don't hesitate to contact me or visit my studio, Best regards. 4466_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4467 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4467_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4468 2022/04/30	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4468_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4470 2022/05/01	Individual, Belgium	 4470_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4471 2022/05/01	Atelier La Danse du Feu, Company, France	Should the lead be registered, the deadlines for the stained glass artcraft are much too short. 4471_lead-attachment.zip	Please see response to comment # 3862
4472	Atelier Berthier , Company,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/05/01	France	4472_plomb.docx	Please see response to comment # 3862
4474 2022/05/01	Individual, Netherlands	4474_Brief voor ECHA.pdf	
4475 2022/05/01	Individual, New Caledonia	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4475_Copie de 2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4476 2022/05/01	Individual, France	If ever lead has to be registered, the deadlines for the stained glass window activity are much too short. 4476_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4477 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4477_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4478 2022/05/01	NOUAILHAT, Company, 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
4479 2022/05/01	Stichting Glaslab Den Bosch, Academic institution, Poland	4479_ECHA lood uitzondering loodverwerking Glaslab Den Bosch 30-04-2022 pc.pdf	
4481 2022/05/01	Individual, Belgium	4481_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4482	Individual,		

2022/05/01	Belgium	4482_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4483 2022/05/01	Individual, Belgium	No remarks	
4484 2022/05/01	Individual, France	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 I- CONTEXT 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. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass:	Please see response to comment # 3862

		2 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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. - 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. d) Economic and social, environmental, cultural and societal consequences: Economic and Social : 3 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? 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. 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. 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. 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. 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. Président Jean Mône	
4485 2022/05/01	Club PSL, Other contributor, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4485_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4486 2022/05/01	Individual, 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
4488 2022/05/01	ederal Associations of the German Jewellery and Silverware Industry, Industry or trade association, Germany	please see document attached (uploaded) 4488_20220501-comments-vbv-lead.pdf	
4489 2022/05/01	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4489_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4490 2022/05/01	Individual, France	Rather that to ban usage of lead for stained glass, an exception should be made for this activity. A specific regulation should be put in place, commensurate to the capabilities of the activity thazt is not industrial at all.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban**

			A.2.16 Targeted restriction more appropriate regulatory risk management action than authorisation C.1.3. Aspects not justifying an exemption from authorisation
4491 2022/05/01	Didier QUENTIN VITRAUX, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4491_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4494 2022/05/01	Individual, Belgium	4494_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4495 2022/05/01	Individual, France	o If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4495_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4496 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4496_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4497 2022/05/01	Deutsche Gesellschaft für Kulturgtuschutz e.V., National NGO, Germany	4497_EU-Verordnung - Chemieverordnung REACH - Novellierung - Anhang XIV - Blei - ICOMOS-ISC CSG-DGKS_2022.pdf	
4498	Individual,	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/05/01	France	4498_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4499 2022/05/01	Mélanie Lecointe, Company, France	If ever the lead had to be regeistered, the deadlines for the stained glass windows are much too short! 4499_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4500 2022/05/01	Flores Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4500_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4501 2022/05/01	BASTIEN MOSAIQUE VITRAIL, Company, France	Si jamais le plomb devait être inscrit, les délais pour le vitrail sont beaucoup trop court 4501_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4502 2022/05/01	Individual, France	If ever the lead had to bee registrered, the deadlines for the stained glass window are much too short. 4502_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4503 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4504 2022/05/01	Chambre Syndicale nationale du Vitrail, Trade union, France	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	

		4504_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4505 2022/05/01	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
4506 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4506_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4507 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4507_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4508 2022/05/01	Individual, Germany	Scratch the lead ban. Forever.	Please see response to comment # 4153
4509 2022/05/01	Stiftung Spiel / Spielmuseum Soltau, Other contributor, Germany	4509_Briefe-ECHA-2022-05-01.pdf	
4510 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4510_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4511	Centre international du Vitrail,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	**B.1.2. Aspects not considered**

2022/05/01	Academic institution, France		**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**
4512 2022/05/01	Individual, 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
4513 2022/05/01	Individual, Russian Federation	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4513_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4514 2022/05/01	Matières d'Expression, Company, France	I- CONTEXT 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.	Please see response to comment # 3862

		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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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.	

		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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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. - 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. 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? 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. 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. 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. 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.	

		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. 4514_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4515 2022/05/01	Alexis Ferron, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4515_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4516 2022/05/01	Anne Boeffard, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4516_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4517 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4517_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4519 2022/05/01	Atelier de Vitrail Mise en Verre, Company, Switzerland	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4519_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4520 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4520_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4521 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4521_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4522 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4522_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4523 2022/05/01	Individual, Switzerland	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4523_2022.04.25._-_CNSV_-_R├®ponse_consultation_ECHA_-_Contribution_Anglais[1].pdf	Please see response to comment # 3862
4524 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4524_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4525 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4525_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4526 2022/05/01	Individual, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4526_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4527 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4527_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4528 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4528_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4529 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4529_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4530 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4530_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4531 2022/05/01	Individual, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4531_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4532 2022/05/01	France, Member State	if ever the lead had to be registrerd, the deadlines for stained glass window are much too short 4532_Réponse_Vitrail_.docx	Please see response to comment # 3862
4533 2022/05/01	Voile d'Iris, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4533_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4534 2022/05/01	Magies Glas, Company, Netherlands	 4534_Brief_aan_ECHA_Europese_commissie.pdf	
4535 2022/05/01	Individual, Belgium	 4535_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	

4536 2022/05/01	ARVEILLER, Company, France	Ie lead had to be registered, the deadlines for the stained glass window are much too short 4536_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4537 2022/05/01	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4537_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4538 2022/05/01	Museumsverband Baden-Württemberg e.V., National NGO, Germany	see Attachment 4538_2022_05_01_Protestbrief_Bleiverbot_ECHA.pdf	Please see response to comment # 3585
4539 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4539_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais 2.pdf *Confidential attachment removed*	Please see response to comment # 3862
4541 2022/05/01	Individual, Germany	 4541_Bitte um Ausnahmeregelung für Blei_Absender Peter Diehl.pdf	
4542 2022/05/01	L'ATTRAPE LUMIERE, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4542_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4543 2022/05/01	Individual, Belgium	 4543_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4544 2022/05/01	FRIEDENSMUSEUM Brücke von Remagen e.V., Company,	 4544_Brief EU.docx	

	Germany		
4546 2022/05/01	atelier kb, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4546_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4547 2022/05/01	Atelier Gouty, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. Uses exempted from the autorisation requirement	Please see response to comment # 3862
4548 2022/05/01	Individual, 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
4549 2022/05/01	ATELIER DYL VITRAIL SARL, Company, France	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. *Confidential attachment removed*	Please see response to comment # 3862
4550 2022/05/01	Individual, Belgium	4550_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4551 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4551_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4552 2022/05/01	Individual, Belgium	4552_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4554	Individual, Germany		

2022/05/01		*Confidential attachment removed*	
4556 2022/05/01	Individual, France	L'uniformisation, la standardisation ne doit pas nuire à la personnalité de Communes et Territoires français riches de Culture et de savoir-faire. En effet aujourd'hui la science nous permet de connaitre et mesurer la toxicité d'objets utilisés quotidiennement. Les contrôles peuvent suffire sans amputer la Culture et les Savoir-Faire locaux de ces objets contemporains issus du Patrimoine.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.1. Potential other regulatory actions**
4558 2022/05/01	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4558_CONTRIBUTION Anglais 01-05-2022 Aurelie Moreau.pdf	Please see response to comment # 3862
4559 2022/05/01	Individual, Belgium	4559_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4560 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4560_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4561 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are muchtoo short 4561_2022.04.25. - CNSV - Re├üponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4564 2022/05/01	Individual, Belgium	4564_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4565 2022/05/01	Individual, French Southern Territories	4565_ECHA_Lead_ICOMOS_ICOM_ECCO_letter_Godot_Marie.pdf	
4566 2022/05/01	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4566_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	

			Please see response to comment # 3862
4567 2022/05/01	Le Temps du Vitrail, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4567_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4568 2022/05/01	Individual, Germany	Kommentare zu den vorgeschlagenen Terminen: Das ganze Thema ist sehr komplex und noch in keinem Detail durchgearbeitet - Die dadurch entstehenden Auswirkungen sind nicht bedacht - Kann z.B. zu einer Klimakatastrophe führen. (Erneuerbare Energien) - Die aktuellen Termine sollen ausgesetzt werden.	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4569 2022/05/01	Individual, Belgium	4569_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4570 2022/05/01	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4570_2022.04.25._-_CNSV_-_Réponse_consultation_ECHA_-_Contribution_Anglais[1].pdf	Please see response to comment # 3862
4572 2022/05/01	Les Vitraux du Heron, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4572_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4574	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4574_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/05/01			Please see response to comment # 3862
4576 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4576_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4577 2022/05/01	sarl Atelier Saint Clair, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4577_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4578 2022/05/01	Couleur vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4578_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4579 2022/05/01	l'atelier d'anne sophie, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4579_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4580 2022/05/01	Highcliffe Castle, Other contributor, United Kingdom	 4580_ECHA Letter Jarron.pdf	
4581 2022/05/01	SARL Bellion, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4581_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4583 2022/05/01	O bout de verre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4583_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4584 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4584_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4585 2022/05/01	CHAMBRE SYNDICALE NATIONALE DU VITRAIL, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4585_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4586 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4586_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4587 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4587_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4588 2022/05/01	Maison Lorin, Company, France	 *Confidential attachment removed*	
4590 2022/05/01	Atelier Thomas Masson, Company, France	If ever the lead had to be registered, the deadlines for stained glass window are way too short 4590_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4591 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4591_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4592 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4592_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4593 2022/05/01	Hungarian Association of Conservators/Restorers, Other contributor, Hungary	*Confidential attachment removed*	
4594 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4594_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4595 2022/05/01	DEPIREY DESIGN STUDIO, Company, 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
4596 2022/05/01	Individual, France	• If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4596_2022.04.25. - CNSV - Reponse consult ation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4597 2022/05/01	Vitrail & Fines Herbes, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4597_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4598	ATELIER VITRAIL DU LEMAN,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4598_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/05/01	Company, France	*Confidential attachment removed*	Please see response to comment # 3862
4599 2022/05/01	Individual, Belgium	4599_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4600 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4600_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4602 2022/05/01	LE JARDIN DU VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4602_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4603 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4603_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4604 2022/05/01	Individual, 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
4605 2022/05/01	Chambre Syndicale Nationale 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 4605_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4606 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4606_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4607 2022/05/01	Vitrail Saint-Georges, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4607_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4608 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4608_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4609 2022/05/01	Individual, France	o If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4609_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4610 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4610_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4611 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4612 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4612_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4614 2022/05/01	Heimatverein Dittmannsdorf e.V., Other contributor, Germany	4614_Votum_Blei-Ausnahmeregelung_an_ECHA_von Heimatverein Dittmannsdorf e.V.pdf	
4615 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4615_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4616 2022/05/01	Atelier Vitrail Fusing Peinture, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4616_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4617 2022/05/01	Atelier Chazot / Art'Corpus, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4617_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4618 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4618_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4619 2022/05/01	Glasmalerei Frese GmbH, Company, Germany	4619_Kommentar Bleiverbot Echa.pdf	
4620 2022/05/01	LEX z.s., National NGO, Czech Republic	- Latest application date by mělo být alespoň 48 měsíců. - Sunset date by měl být 36 měsíců po LAD. - Doporučujeme zahrnout „review period" pro užití, která využívají pevné substance olova. Tyto pevné substance jsou ve volné přírodě velmi stabilní a jejich vliv na životní prostřední je tak potřeba separátně přezkoumat. V rámci dokumentace (Draft background document for lead – kap. 3.2.) k této veřejné konzultaci ECHA argumentuje, že tato „review period" není navržena proto, že ECHA nemá přístup k potřebným informacím	**B.1.3. Review periods** **B.1.3.1. Upfront review periods**

		a dokumentům. Tento argument je z pozice veřejné instituce s ohledem na značné ekonomické a bezpečnostní dopady neobhajitelný. 4620_LEX attchmnt.zip	**B.2.01. Request extra long LAD**
4621 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4621_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4622 2022/05/01	Individual, France	If ever the lead had to be registered, thé déclinés for the stained glass Windows are much too short. 4622_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4623 2022/05/01	Individual, Belgium	 4623_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4624 2022/05/01	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4624_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4625 2022/05/01	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4625_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4626 2022/05/01	ICOMOS Belgium, National NGO, Belgium	 4626_IBE - ECHA - Plomb - VF.pdf	
4627 2022/05/01	Individual, Germany	 4627_220401 Delp-ECHA Blei.pdf	
4629 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are way too short 4629_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4630 2022/05/01	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4630_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4631 2022/05/01	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained-glass window are much too short 4631_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4633 2022/05/01	Individual, Belgium	 4633_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4634 2022/05/01	Individual, Germany	 4634_Brief Bleiverbot ECHA Tom Frisch.pdf	
4636 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4636_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4637 2022/05/01	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4637_Document ECHA Cedric Chapelle.pdf	**B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-**

			economic aspects
4638 2022/05/01	Individual, Belgium	 4638_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4639 2022/05/01	Erlebniswerkstatt Buchdruck-Museum Soltau e.V., National NGO, Germany	see attachment 4639_Schreiben ECHA 01.05.2022, Seiten 1 und 2.zip	Please see response to comment # 4554
4640 2022/05/01	Larchitecteetlevitrail, Company, 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
4641 2022/05/01	Larchitecteetlevitrail, Company, 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
4642 2022/05/01	Individual, Germany	 4642_Brief Echa_1.pdf	
4643 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4643_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4644 2022/05/01	association culturelle de Méricourt atelier vitrail, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4644_2022.04.25. - CNSV - Re╠üponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4645	ARGE – The European Federation of	No specific comments.	

2022/05/01	Associations of Locks & Builders Hardware Manufacturers, Industry or trade association, Germany		
4646 2022/05/01	Individual, Germany	4646_Blei-Ausnahmereglung-Brief-Vorlage_ECHA.pdf	
4647 2022/05/01	figawa - Bundesvereinigung der Firmen im Gas- und Wasserfach e.V., Industry or trade association, Germany	Should lead be included in Annex XIV of REACH, the sanitary appliances sector would need sufficient time to organise as a high number of potential applicants from our industry is to be expected. [Indeed, according to the European Drinking Water association, around 5000 companies manufacture finished products in contact with drinking water, most of which are SMEs. The products include notably pipes, fittings, water storage systems, measurement apparels as well as taps and sanitary appliances.] Additional to this, the recycling supply chain needs to be involved in any type of process change as they will be heavily affected by any change in the composition of the brass material. Most of sanitary appliances are produced from metallic alloys. Indeed, the JRC MEErP Preparatory Study on Taps and Showers (2014) provides that 90-99% of the taps produced in Europe are made mostly of brass. Should lead be included into Annex XIV of REACH, downstream users of brass alloys in the sanitary appliances sector may choose to submit applications individually or jointly. If applications are made individually, a high number of submissions should be expected. Should the industry decide to submit joint applications, experience has shown that these are often less documented as companies would have to face issues related to the compilation of individual data into combined information which are de facto less representative. Experience has also shown that joint applications often result in shorter review periods and hence earlier review reports for ECHA to process. In both cases, an application for authorisation by this industry, mostly composed of SMES will induce a high burden of workload both for the authorities and companies. To overcome the intrinsic disadvantage of joint applications, solid and time consuming collaboration needs to be developed between the applicants taking into account IP and confidentiality concerns. We would therefore request that longer transitional arrangements are applied to allow companies in the sector and the supply chain, sufficient time to organise in order to maximise the quality of submissions. 4647_Statement figawa - EU Authorization requirement LEAD_DE-EN.zip	Please see references to responses in section I
4648 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4648_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4649 2022/05/01	Association de Conservateurs-Restaurateurs d'Oeuvres	4649_APROA-BRK_Letter to ECHA.pdf	

	d'Art/ Beroepsvereniging voor Conservators-Restaurateurs van Kunstvoorwerpen (APROA-BRK), Industry or trade association, Belgium		
4650 2022/05/01	Individual, Belgium	4650_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4651 2022/05/01	Alchimie du Verre, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4651_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4652 2022/05/01	Individual, Belgium	As a retired EU offical, who participated to the EU intergation process, and feels commited to EU overall interest, I would like to draw attention of the officials in charge to the need to protect the Artistic world and particularly the small structures which have difficult conditions to survive on a day-to-day basis. Should it not be possible to go for an exemption providing long period of adpatation would be a must. 4652_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	Please see response to comment # 4330
4653 2022/05/01	ATELIER PIERRE DESCAMPS, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4653_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4654 2022/05/01	Individual, France	4654_ECHA_Lead_AnaisBesnard_FR.pdf	
4655 2022/05/01	VirJi, Company, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4655_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4656	Glasbau Gerber, Company,	4656_Bleiverbot_ECHA_TT.pdf	

2022/05/01	Germany		
4657 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4657_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4658 2022/05/01	Glasbau Gerber, Company, Germany	 4658_Bleiverbot_ECHA_PB.pdf	
4659 2022/05/01	FAB LUZ VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4659_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4660 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4660_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4661 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4661_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4662 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4662_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais 6.pdf	Please see response to comment # 3862
4663 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4663_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment #

			3862
4664 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4664_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4665 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4665_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4666 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4666_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4667 2022/05/01	Vitraux d'hier et d'aujourd'hui, Company, France	If ever the lead has to be registered, the deadlines for tha stained glass window are much too short. 4667_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4668 2022/05/01	Individual, France	o If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4668_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4669 2022/05/01	Atelier de vitrail Amélie Jost, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4669_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4671 2022/05/01	Individual, Germany	 4671_Ausnahmeregelung_Bleisatz-EU.pdf	

4672 2022/05/01	RenoVitro, Company, Belgium	If ever the lead had to be registered, the deadline for the staindglass window are much too short 4672_Annex XIV of the REACH regulation.docx	Please see response to comment # 4330
4673 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4673_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4675 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4675_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4676 2022/05/01	Individual, Belgium	 4676_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4677 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4677_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais 6.pdf	Please see response to comment # 3862
4678 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4678_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais 5.pdf	Please see response to comment # 3862
4679 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4679_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4680	Individual,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/05/01	France	4680_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4681 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4681_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4682 2022/05/01	Individual, Italy	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4682_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais 7.pdf	Please see response to comment # 3862
4683 2022/05/01	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4683_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4684 2022/05/01	Atelier Laurine Claude, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4684_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4685 2022/05/01	Commune Le Le Ménil-Scelleur, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4685_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4686 2022/05/01	France, Member State	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4686_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4687 2022/05/02	Atelier A Fleur de Verre, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4687_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4688 2022/05/02	Cerfav, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window sector are much too short.	**B.1.2.2. Lack of alternatives, socio-economic aspects**
4689 2022/05/02	Association La Pierre Scellée pour la sauvegarde du patrimoine communal du Ménil-Scelleur, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4689_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4690 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are miche top short 4690_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4691 2022/05/02	Pierre Bertin Vitraux, Company, France	4691_2022.04.25. - CNSV - Réponse con_sultation ECHA - Contribution An_glais.pdf	
4692 2022/05/02	Individual, Germany	4692_Ausnahmeregelung_Bleisatz-ECHA.docx	
4693 2022/05/02	Individual, France	4693_ECHA_Lead_ICOMOS_ICOM_ECCO_JointStatement_20220426_EN.pdf	
4694 2022/05/02	Hélène Fortin-Rincé, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4694_2022.04.25. - CNSV - R_®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4695 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4695_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4696 2022/05/02	Individual, France	Lead use will kill the general activity of stained glass. 4696_lettre_consultation_plomb Ateliers d'Art de France.pdf *Confidential attachment removed*	Please see response to comment # 3805
4697 2022/05/02	Test and Measurement Coalition, Industry or trade association, Belgium	ECHA proposes the sunset date to be 18 months after the latest application date of maximum 24 months. This means in total maximum of 3.5y. This transition period is not sufficient for complex products such as industrial test and measurement equipment. The product portfolios of the Test & Measurement coalition are very vast, with members each having typically 2,000 to 3,000 products currently made available on the market. These are highly complex, sophisticated electronic instruments (e.g. power analysers, oscilloscopes, chemical and biological analysers, electron microscopes, and others), which can comprise between 2,000 and 40,000 individual parts. Our products therefore require a vast and complex supply chain involving tens of thousands of suppliers and hundreds of thousands of items. The proposed longest sunset date of 3.5y does not allow sufficient time to survey the supply chain and gather necessary information to prepare for and ensure compliance. In the context of inclusion of the scope of RoHS, industrial test and measurement equipment has been given sufficiently long transitional period of 9 years after which the restriction started applying to this category of products. 4697_Test and Measurement Coalition input ECHA consultation lead 22 April 22.pdf	Please see references to responses in section I
4698 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4698_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4700 2022/05/02	Unterieser Glasgestaltung, Company, Germany	 4700_Anschreiben Bleiverbot Helsinki.docx	
4701 2022/05/02	GLR Rothkegel GmbH & Co. KG, Company,	 *Confidential attachment removed*	

	Germany		
4702 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4702_2022.04.25. - CNSV - Reponse consult ation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4703 2022/05/02	Maison Arcanthe, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4703_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4704 2022/05/02	Rothkegel Glas & Licht GmbH, Company, Austria	 *Confidential attachment removed*	
4705 2022/05/02	Atelier Mestdagh Bv, Company, Belgium	The proposed sunset date is simply impossible and would mean the end of our craft. 4705_Reaction againt the proposed ban on lead_Atelier Mestdagh.docx	Please see response to comment # 3585
4706 2022/05/02	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4706_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4707 2022/05/02	Individual, Germany	 4707_Anschreiben Bleiverbot Helsinki_Keno.pdf	
4709 2022/05/02	Individual, Belgium	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4709_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4710	Atelier Yvo Vitro, Company,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	

2022/05/02	France	4710_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais-1.pdf	Please see response to comment # 3862
4711 2022/05/02	Nzilani Glass Conservation, Company, United States of America	4711_ECHA Lead Ban.pdf	
4712 2022/05/02	Individual, Germany	*Confidential attachment removed*	
4714 2022/05/02	Wärtsilä Oyj Abp, Company, Finland	Our products are part of the critical infrastructure of society (energy production, gas distribution, 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 products with a long service life. As the authorisation process aims to ensure that substances of very high concern (SVHCs) are progressively replaced by less dangerous substances or technologies where technically and economically feasible alternatives are available, we would like to highlight that even if our company and our suppliers were able to find alternative materials to some of the lead containing components in the future, the development process and rigorous validation will take several years as the lead has a critical role as material, e.g. as anti-friction in heavy machinery. A breakage of this kind of component e.g. in large-scale engine, can endanger the safety of the people at the installation or marine vessel, and cause a severe power shortage. In addition, validating alternative materials for spare parts serving old technologies with life expectancy from 30-50 years, can be extremely difficult.	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4716 2022/05/02	Individual, Belgium	4716_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4717 2022/05/02	EURL CAMADE, Company, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4717_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4718 2022/05/02	Drucken&Lernen Lehrmittelverlag, Company, Germany	4718_Ausnahmeregelung_Bleisatz-ECHA.docx	
4719		Attached the pdf file with IMI HE position	

2022/05/02	IMI Hydronic Engineering SA, International organisation, Switzerland	4719_IMI Hydronic Engineering position.pdf	Please see references to responses in section I
4721 2022/05/02	Département de l'Aube, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4721_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4722 2022/05/02	Individual, Belgium	4722_pétition.docx	
4723 2022/05/02	Individual, Germany	"the present lack of alternatives to (some of) the uses of a substance or the time estimated to change industrial processes and finalise transition to alternatives is no viable reason for prolonging the application dates or sunset dates for the substance or some of its uses." - incredible.	Thank you for your opinion.
4724 2022/05/02	Individual, Germany	4724_ECHA_(english)_comments_Kreil.pdf	
4725 2022/05/02	Individual, Belgium	4725_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4726 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4726_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4727 2022/05/02	Individual, Belgium	4727_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4728 2022/05/02	Individual, France	Tant que des solutions donnant les mêmes résultats il est important de permettre à ces métiers d'art de pouvoir continuer à produire et donc de maintenir un savoir-faire faire, de l'emploi. Donc de maintenir une production de plomb.	**B.1.2. Aspects not considered by ECHA when proposing latest application**

			dates / sunset dates B.1.2.2. Lack of alternatives, socio-economic aspects
4729 2022/05/02	Individual, Germany	4729_Einspruch-Bleiverbot.docx *Confidential attachment removed*	
4730 2022/05/02	ATELIER VERSICOLORE, Company, Belgium	4730_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4731 2022/05/02	Individual, Belgium	4731_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf	
4732 2022/05/02	Individual, Belgium	4732_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4733 2022/05/02	Individual, Belgium	4733_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4734 2022/05/02	Individual, Belgium	4734_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4735 2022/05/02	Hans Sasserath GmbH&Co.KG, Company, Germany	Should lead be included in Annex XIV of REACH, the sanitary appliances sector would need suffi-cient time to organise as a high number of potential applicants from our industry is to be expected. [Indeed, according to the European Drinking Water association, around 5000 companies manufac-ture finished products in contact with drinking water, most of which are SMEs. The products include notably pipes, fittings, water storage systems, measurement apparels as well as taps and sanitary appliances.] Additional to this, the recycling supply chain needs to be involved in any type of process change as they will be heavily affected by any change in the composition of the brass material. Most of sanitary appliances are produced from metallic alloys. Indeed, the JRC MEErP Preparatory Study on Taps and Showers (2014) provides that 90-99% of the taps produced in Europe are made mostly of brass. Should lead be included into Annex XIV of REACH, downstream users of brass alloys in the sanitary appliances sector may choose to submit applications individually or jointly. If applications are made individually, a high number of submissions should be expected. Should the industry decide to submit joint applications, experience has shown that these are often less documented as compa-nies would have to face issues related to the compilation of individual data into combined informa-tion which are de facto less representative. Experience has also shown that joint applications often result in shorter review periods and hence earlier review reports for	Please see response to comment # 4647

		ECHA to process. In both cases, an application for authorisation by this industry, mostly composed of SMES will induce a high bur-den of workload both for the authorities and companies. To overcome the intrinsic disadvantage of joint applications, solid and time consuming collaboration needs to be developed between the ap-plicants taking into account IP and confidentiality concerns. We would therefore request that longer transitional arrangements are applied to allow companies in the sector and the supply chain, sufficient time to organise in order to maximise the quality of submissions.	
4736 2022/05/02	Individual, France	Il ne faut pas interdire le plomb.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban**
4737 2022/05/02	Klassik Stiftung Weimar, Other contributor, Germany	4737_20220428_Antrag Ausnahme Blei in der Dmpf_02.pdf	
4738 2022/05/02	Freiburger Münsterbauverein e.V., Other contributor, Germany	4738_Bleiverwendung EU.pdf	
4740 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4740_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4741 2022/05/02	Individual, France	Les vitraux en France sont situés dans des églises de très petites communes dont certaines sont propriétaires de plusieurs édifices. Je constate déjà la disparition progressive de nombreux vitaux par manque d'entretien, par manque de moyen. Les ateliers d'art pour les vitaux font partie souvent de très petites structures de 1 à 2 personnes passionnées et qui combattent pour la sauvegarde d'un bien culturel pour le bonheur de tous. Leur apporter trop de contraintes va les faire disparaitre et les grands ateliers qui auront plus de moyens ne viendront pas dans les toutes petites communes.	Please see references to responses in section I
4743 2022/05/02	Rueil vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4743_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4744 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stainedglass Windows are much too short	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4745 2022/05/02	SARL Vitrail Saint Jean l'Art-Elier, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4745_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4746 2022/05/02	Senate, Other contributor, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4746_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4747 2022/05/02	Individual, Belgium	4747_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4748 2022/05/02	Individual, Belgium	4748_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4750 2022/05/02	Glasmalerei Peters GmbH, Company, Germany	Ceramic color, including lead is essential part for the creation and restoration of glass windows. 4750_Blei.docx	Please see response to comment #

			3585
4752 2022/05/02	Individual, France	if ever the lead had to be registered,the deadlines for the stained glass window are much too short	**B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4754 2022/05/02	Individual, Belgium	4754_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4756 2022/05/02	Atelier Berthelot, Company, 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
4757 2022/05/02	Oras Oy, Company, Finland	see attachment 4757_Lead to Reach sosioeconoimic statement Oras 2022-04-29.pdf	Please see response to comment # 4647
4758 2022/05/02	Individual, Germany	4758_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt.pdf	
4759 2022/05/02	Individual, 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
4760	Fabrique d'église Sainte-Waudru,	4760_Enquête UE - Plomb - Hiérarchisation des priorités - Waudru.docx	

2022/05/02	Other contributor, Belgium		
4761 2022/05/02	Individual, Belgium	4761_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4765 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4765_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4766 2022/05/02	Individual, Belgium	4766_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4768 2022/05/02	Individual, Belgium	4768_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4770 2022/05/02	Individual, Belgium	4770_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4771 2022/05/02	Zentralverband des Deutschen Handwerks, Other contributor, Germany	See file attached 4771_2022-04-28_ZDH-Stellungnahme REACH_EN.docx	Please see response to comment # 4554
4772 2022/05/02	Römisch-Germanisches Zentralmuseum, Academic institution, Germany	*Confidential attachment removed*	
4773 2022/05/02	ABB Oy, Company, Finland	The Service life of our Products (Large Motors and Generators) is typically 20 to 30 years. There is requirement for spare- and maintenance parts availability during product Service life period. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verify the changes against technical design specifications and relevant Regulations, Standards and Directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation”	Please see response to comment # 4239

		Confidential attachment removed	
4774 2022/05/02	Domschatz Essen, Company, Germany	*Confidential attachment removed*	
4775 2022/05/02	ANCIENS ETABLISSEMENTS GRIGNARD SPRL, Company, Belgium	4775_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4776 2022/05/02	Keramikmuseum Westerwald, Academic institution, Germany	4776_Protestbrief wegen Bleiverbot1.docx	
4777 2022/05/02	Fachgruppe der Freilichtmuseen im Deutschen Museumsbund, Academic institution, Germany	4777_FG Freilichtmuseen_Bleifenster.pdf	
4778 2022/05/02	Keramikmuseum Westerwald, Academic institution, Germany	4778_Protestbrief wegen Bleiverbot2.docx	
4779 2022/05/02	EVVA Sicherheitstechnologie GmbH, Company, Austria	Should this prioritisation of SVHCs and preparation of draft Annex XIV entries gain legal validity the sunset dates are definitely too short for the market and industry. A generic roadmap like the EU green deal (2050) is missing.	**B.1.2. Aspects not considered by ECHA when proposing latest application dates / sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4780 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4780_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4781 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4781_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4782 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4782_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4783 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short We do not have any substitute materials in our field and banning lead would mean the condemnation to disappear for small European craft businesses. We hope that the commission will be able to show discernment in taking its decisions and that Europe will choose to preserve its heritage. 4783_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4784 2022/05/02	Atelier Simon-Marq, Company, France	If ever the lead had to be registered, the deadlines for stained glass are much too short. 4784_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4785 2022/05/02	Future for Religious Heritage (FRH), International NGO, Belgium	 4785_FRH_ECHA's plan to include lead in the list of substances subject to authorisation.pdf	
4786 2022/05/02	Individual, United Kingdom	 4786_EN Sample letter stained glass and lead template letter.docx	
4787 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4787_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4788 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4788_2022.04.25. - CNSV - R--ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4789 2022/05/02	Wirtschaftskammer Österreich (WKÖ), Other contributor, Austria	see attachment 4789_su_343_Stellungnahme_Priorisierung Anh XIV_Blei.pdf	Please see references to responses in section I
4790 2022/05/02	Bevaring Sjælland, Company, Denmark	 4790_ECHA's plan to include lead in the list of substances subject to authorization.pdf	
4791 2022/05/02	ABB Oy, Company, Finland	The Service life of products is typically 15 years for Variable Speed Drives. Requirement for spare- and maintenance parts availability is following product Service life period. Service life is period after serial production has seized following the Life Cycle Management model. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verity the changes against technical design specifications and relevant Regulations, Standards and directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
4792 2022/05/02	Individual, France	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 I- CONTEXT 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	Please see response to comment # 3862

		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. 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. DESCRIPTION 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. 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. 3. In terms of creation, the surfaces treated between secular and religious are about 50/50. 4. Between responding to a call for tenders and carrying out the work, several years may pass (typically 5 years). II- ARGUMENTS AGAINST THE INSCRIPTION OF LEAD IN ANNEX XIV a) There is no substitute for lead There are several ways to crimp glass: • Glass 2 to 5 mm thick tinted in the mass: 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. 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 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. • Glasses from 1 cm to 2.5 cm thick 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. 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. 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 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.	

		- 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. 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? 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. 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. 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. 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. 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. 4792_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
4793 2022/05/02	Neue Sächsische Galerie Chemnitz, Other contributor, Germany	4793_Blei-Ausnahmereglung-Brief-NSG_ECHA.pdf	
4795 2022/05/02	MINERAL CREATION, Company, France	If ever the lead had to beregistered, the deadlines for the stained glass window are muchtoo short 4795_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4797 2022/05/02	Meissen Porzellan-Stiftung GmbH, Company, Germany	4797_ECHA 2.5.2022.pdf	
4798 2022/05/02	SFG / APSV Schweizerischer Fachverband für Glasmalerei / Association professionnelle suisse du vitrail, Industry or trade association, Switzerland	Das Verbot von Blei nie anwenden! 4798_Stellungsnahme EU Verbot von Blei European Chemicals Agency.pdf	Please see response to comment # 3585
4799 2022/05/02	Hitachi Energy Czech Republic s.r.o., Company, Czech Republic	See next comment as we like to see our products / Industry to be exempted by this planned authorization of lead. Furthermore, we see more benefit to use Annex XVII for further restriction of critical applications. In our industry, lead is not exposed to environment and critical to human health as the waste treated in a professional disposal management by approved recycling companies. 4799_Position-paper-Pb-metal-Authorisation-final_web.pdf *Confidential attachment removed*	Please see response to comment # 3856
4800	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4800_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais - Copie.pdf	

2022/05/02		*Confidential attachment removed*	Please see response to comment # 3862
4801 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4801_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais - Copie.pdf *Confidential attachment removed*	Please see response to comment # 3862
4802 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4802_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais - Copie.pdf *Confidential attachment removed*	Please see response to comment # 3862
4803 2022/05/02	Individual, France	 4803_GURNEL -ECHA .pdf	
4804 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4804_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4805 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4805_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais - Copie.pdf *Confidential attachment removed*	Please see response to comment # 3862
4806 2022/05/02	Atelier DADA LUMIERE, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4806_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4807 2022/05/02	SFG / APSV Schweizerischer Fachverband für	Verbot für die Glasmalerei nie Anwenden 4807_Stellungsnahme EU Verbot von Blei European Chemicals Agency.docx	

	Glasmalerei / Association professionnelle suisse du vitrail, Industry or trade association, Switzerland		Please see response to comment # 3585
4808 2022/05/02	Stiftung Werkstattmuseum für Druckkunst, Other contributor, Germany	*Confidential attachment removed*	
4809 2022/05/02	Individual, France	4809_GURNEL F - ECHA.pdf	
4810 2022/05/02	Individual, France	4810_GURNEL C - ECHA.pdf	
4811 2022/05/02	Office of the President of the Czech Republic, Department for Heritage Care, National Authority, Czech Republic	4811_zakova_220502-113344-445.pdf	
4812 2022/05/02	Individual, Belgium	4812_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4813 2022/05/02	Individual, Belgium	4813_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf	
4814 2022/05/02	Naturkundemuseum Leipzig, Regional or local authority, Germany	4814_22_05_02 Statement Naturkundemuseum Leipzig ECHA Finland.pdf	
4815 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4815_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment #

			3862
4816 2022/05/02	Individual, Netherlands	.... 	-
4818 2022/05/02	Individual, Germany	 4818_Oliver Schach_202205023_Einspruch an ECHA.pdf	
4820 2022/05/02	Vineta-Museum der Stadt Barth, Other contributor, Germany	 4820_VinetaM.pdf	
4821 2022/05/02	Hitachi Energy Czech Republic s.r.o., Company, Czech Republic	See next comment as we like to see our products / Industry to be exempted by this planned authorization of lead. Furthermore, we see more benefit to use Annex XVII for further restriction of critical applications. In our industry, lead is not exposed to environment and critical to human health as the waste treated in a professional disposal management by approved recycling companies. 4821_Position-paper-Pb-metal-Authorisation-final_web.pdf *Confidential attachment removed*	Please see references to responses in section I
4822 2022/05/02	Förderverein Kulturgüter Wasserburg Divitz e.V., Other contributor, Germany	 4822_Divitz.pdf	
4823 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are way too short 4823_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4824 2022/05/02	Städtische Museen Großenhain, Regional or local authority, Germany	 4824_Brief Ausnahmeregelung für die Verwendung von Blei_22-05-02.docx	
4825 2022/05/02	Historische Kommission für Pommern e.V., Other contributor, Germany	 4825_Hiko.pdf	
4826 2022/05/02	Hungarian Blackpowder Shooters and Hunters Association, National NGO,	Dear Madam/Sir, 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. Any further regulation of lead is unacceptable. All the arguments we submitted for the consultation of Annex	Please see references to responses in section I

	Hungary	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. 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. 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. 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. 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. (https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/) 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. 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.” 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. 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. 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.	

		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. 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. 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. balazs.sc@gmail.com, +36204696530 4826_ECHA letter 20220502.docx	
4827 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4827_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4828 2022/05/02	Joh. Pengg AG, Company, Austria	We use lead always as an downstream user and we do not produce lead. Our technologies which require lead are the following: • patenting of spring steel wire (lead patenting bath) • producing thin oil tempered spring steel wire (lead tempering baths) For patenting and tempering substitutions/alternatives are not available on an industry level in our product range (depends on diameter!) we produce. For some of our products we are sole supplier to the market. If an inclusion of lead in REACH Annex XIV would happen we would loose our business cause technologies substitutions/alternatives are not available in our product range (small average diameter).	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.5. Availability of suitable alternatives A.1.5.6. Socio-economic**

		For a very small part of our products we would need many years to substitute lead in our processes. 	**benefits of continued use**
4829 2022/05/02	The Stained Glass Museum, Other contributor, United Kingdom	 4829_ECHA.pdf	
4830 2022/05/02	Individual, Belgium	 4830_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4831 2022/05/02	Megin oy, Company, Finland	None 4831_KH0220518ENN.en.pdf	
4833 2022/05/02	Museum Schloss Wolkenstein, Other contributor, Germany	 4833_Kommentar.pdf	
4834 2022/05/02	Individual, Belgium	 4834_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4835 2022/05/02	Staatliche Kunstsammlungen Dresden, Regional or local authority, Germany	 4835_20220502125404127.pdf	
4836 2022/05/02	IGMNIR, Industry or trade association, Poland	 4836_IGMNiR - recom_com_call_for_info_questionnaire_en.pdf	
4837 2022/05/02	Individual, Belgium	 4837_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4838 2022/05/02	Bittium Corporation , Company, Finland	 *Confidential attachment removed*	
4839 2022/05/02	Individual, Germany	 4839_20220502121312 Blei 1.pdf	

4840 2022/05/02	Individual, France	 4840_contribuer_consultation.pdf	
4841 2022/05/02	ATELIER VITRAIL "PAJ", Company, France	 *Confidential attachment removed*	
4843 2022/05/02	Individual, Belgium	 4843_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4844 2022/05/02	Individual, Belgium	 4844_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf	
4845 2022/05/02	COCIR, Industry or trade association, Belgium	 *Confidential attachment removed*	
4846 2022/05/02	Technology Industries of Finland, Industry or trade association, Finland	It is to be noted that in many cases lead is used in products with a life expectancy of tens of years, up to 50 years or even more. Lead is also used in various products that are part of the critical infrastructure of the society with high criteria and requirements for reliability. After the years of active production, the companies usually need to guarantee spare parts availability at least for 10 years and even up to 50 years. As an example, some critical port infrastructure providers have been forerunners and invested in electrifying their previously fossil-driven non-road vehicles with lead-acid-based battery technology, investing more than EUR 10 million per terminal to charging technology. 10-20 years are usually considered to depreciate the investment, after which it is would be financially feasible to invest into solutions based on battery technologies not using lead. It is important to note that those users would face substantial additional investments to switch to any other type free of lead acid, say Li-Ion based batteries.	**A.2.23 Authorisation requirement for production of spare parts and repair of existing articles** **B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects** Please see references to

			responses in section I
4848 2022/05/02	FIVA - Fédération Internationale des Véhicules Anciens, International NGO, France	4848_Letter to ECHA.pdf	
4849 2022/05/02	L'Amande et L'Obsidienne, Company, France	Les vitraux se fabriquent avec du verre et du plomb depuis près de 1500 ans. Leur entretien réguliers depuis près de 1000 ans a permis autant aux oeuvres les plus anciennes de parvenir jusqu'à nous mais également au savoir-faire d'être transmis et conservé. L'entretien du patrimoine, selon les règles en vigueur, ne peut se faire qu'avec des matériaux identiques à ceux qui nécessitent d'être remplacés. Notre activité est tellement spécifique que la fabrication de nos profilés représente souvent pour nos fournisseurs une part infime de leur activité. Si le maintien de cette branche de leur production devient trop compliquée, et qu'ils décident de l'arrêter, nous n'aurons plus de matière première pour continuer la restauration de notre patrimoine d'hier et la création de celui de demain. Et, comme je l'ai expliqué plus haut, il n'est pas souhaitable que la fabrication de nos profilés en plomb redevienne aussi artisanale qu'elle l'a été au début du XXe siècle au risque que nos compagnons soient exposés à des vapeurs toxiques dont nous n'avons pas, dans les ateliers de vitraux, une bonne connaissance pour s'en protéger le plus efficacement possible, à cette échelle. De plus, nous avons pu constater récemment, lors de la fermeture de notre principal fabricant de profilés en plomb et la revente de leur savoir-faire à une autre entreprise, que cette fabrication est un savoir-faire à part entière, que sans cela, la qualité des plombs produits peut être très variable et que n'importe quelle entreprise fabriquant des produits en plomb n'est pas forcément à même de fabriquer nos profilés. Nous n'avons aujourd'hui aucun substitut au plomb pour notre activité qui présente toutes les caractéristiques permettant le sertissage des verres, et leur protection tout au long de la longue vie d'un vitrail. Pour le patrimoine, il semble peu raisonnable de remplacer le plomb par un substitut neuf, sans recul sur sa réaction dans le temps, face aux multiples contraintes sur des pièces qui ne sont pas censées redescendre de leur emplacement avant 100 ans. La toxicité du plomb est connue depuis l'antiquité et c'est pourquoi la protection des compagnons avec les EPI adaptées à notre utilisation est intégrée depuis longtemps au sein des ateliers tout au long du processus de fabrication et de restauration. L'exposition au plomb de chacun est aussi contrôlée très régulièrement. Ainsi, il n'y a pas un seul cas de saturnisme à déplorer au sein de la profession de vitrailliste/ maître-verrier	Please see response to comment # 3585
4850 2022/05/02	Glasmuseum Weißwasser,	4850_img306.pdf	

	Regional or local authority, Germany		
4851 2022/05/02	Landschaftsverband Westfalen-Lippe, Regional or local authority, Germany	*Confidential attachment removed*	
4852 2022/05/02	Museum Hagenow, Other contributor, Germany	4852_Comments on the draft recommendation of substances for inclusion in Annex XIV.pdf	
4853 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4853_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4854 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4854_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4855 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4855_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4856 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4856_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4857 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4857_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment #

			3862
4858 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4858_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4859 2022/05/02	Individual, Belgium	4859_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4860 2022/05/02	Rijksdienst voor het Cultureel Erfgoed, National Authority, Netherlands	4860_20220502 Akk handtek SL Mr S. O Mally ECHA ref 1270237.pdf	
4861 2022/05/02	Deutsches Nationalkomitee für Denkmalschutz / German National Committee for Monument Preservation , National Authority, Germany	4861_ECHA Reach App. XIV Lead Stellungnahme Konsultation.pdf	
4862 2022/05/02	Sächsisches Industriemuseum Energiefabrik Knappenrode, Academic institution, Germany	4862_Blei-Ausnahmereglung-Brief-Vorlage_ECHA.docx	
4863 2022/05/02	Norwegian Armed Forces / Maintenance Horten, Other contributor, Norway	No comment	
4865 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4865_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4868	Staatliche Ethnographische	4868_Erbitte Ausnahmeregelung.pdf	

2022/05/02	Sammlungen Sachsen (Teil der SKD), Other contributor, Germany		
4869 2022/05/02	Individual, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4869_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4870 2022/05/02	Individual, Belgium	See proposed exemption, below. 4870_Save Stained Glass in Europe - CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	Please see response to comment # 4330
4871 2022/05/02	Individual, France	4871_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4872 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4872_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4873 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4873_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4874 2022/05/02	Natur-Museum Goldberg, Regional or local authority, Germany	4874_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt.pdf	
4876 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4876_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	

			Please see response to comment # 3862
4877 2022/05/02	Individual, Germany	 4877_Ausnahmegenehmigung .pdf *Confidential attachment removed*	
4878 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4878_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4879 2022/05/02	Individual, Belgium	 4879_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4880 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4880_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4881 2022/05/02	Ernst Barlach Stiftung, Other contributor, Germany	 *Confidential attachment removed*	
4883 2022/05/02	Dombauhütte Aachen, Other contributor, Germany	 4883_Ausnahmeregelung für die Verwendung von Blei in der Kunst und Denkmalpflege, Dombauhuette Aachen V1.pdf	
4884 2022/05/02	Individual, Germany	 4884_EU-Bleiverbot.pdf	
4885 2022/05/02	Individual, Germany	 4885_Ausnahmeregelung_Bleisatz-ECHA.docx	
4886 2022/05/02	Zentralverband des deutschen Dachdeckerhandwerks e.V., Industry or trade association,	 4886_202200502_Comments ZVDH.pdf	

	Germany		
4887 2022/05/02	Deutsches Museum von Meisterwerken der Naturwissenschaft und Technik, Other contributor, Germany	4887_Letter to ECHA_Deutsches Musuem.pdf	
4888 2022/05/02	ABB Oy, Company, Finland	The product life cycle is typically 20 years for protection and control products. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verify the changes against technical design specifications and relevant Regulations, Standards and directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
4889 2022/05/02	Normandie Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4889_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4890 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4890_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4893 2022/05/02	Individual, Belgium	4893_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4894 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4894_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4895	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4895_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

2022/05/02			Please see response to comment # 3862
4897 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4897_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4898 2022/05/02	la Fondation du Patrimoine, Regional or local authority, France	4898_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	
4900 2022/05/02	IMI Hydronic Engineering AB, Company, Sweden	The consequence on material quality can be great if the time factor is small, i.e. the shorter the time we get for a change in material, the less we can spend on validating new material in our applications. We risk missing quality deficiencies that we cannot fully overview. Among other things, we have seen that ISO 6509, which is used to ensure the dezincification of the material, does not provide a good reflection of reality when new materials containing other phases have entered the market. Unfortunately, right now there is only one material on the market with a lead concentration that are within 0,3 % that we can use and this material is not as good from a corrosion point of view as the one we use today. Changing from one material to another will also affect our flows of material - both internally and externally. In addition, a major challenge will be to produce scrap with a low lead content or to find solutions for removing lead from the material. A lead-free material will require a higher copper content, which increases the cost of the product. If it is a material that is also new to us, it creates a large extra cost for handling the product and the material in production - every single detail will need more close monitoring of the staff to ensure that we capture and investigate any problems. Some details will need to be redesigned. The biggest risk we see is that if the industry does not have sufficient time due to too a short changeover period, our factory will have to close down.	**A.1.5.2. Authorisation is disproportionate and/or means a ban** **A.1.5.5. Availability of suitable alternatives** **B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
4901	Vitrocentre and Vitromusée Romont,	If ever the lead had to be registered, the deadlines for stained glass windows are much too short. 4901_ECHA_Lead_Statement_VMR_VCR_20220502.pdf	

2022/05/02	Other contributor, Switzerland	*Confidential attachment removed*	Please see response to comment # 3862
4902 2022/05/02	Sächsische Landesstelle für Museumswesen, Regional or local authority, Germany	4902_2022-05-02 Blei-Ausnahmeregelung ECHA.pdf	
4903 2022/05/02	ABB Oy, Company, Finland	The Service life of products is typically 15 years for Variable Speed Drives. Requirement for spare- and maintenance parts availability is following product Service life period. Service life is period after serial production has seized following the Life Cycle Management model. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verity the changes against technical design specifications and relevant Regulations, Standards and directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
4904 2022/05/02	Dachdecker - Fachinnung Westeifel, Company, Germany	4904_Bedenken Bleiverbot.docx	
4905 2022/05/02	Royal Institute of Architects of Ireland (RIAI), Industry or trade association, Ireland	4905_220315 DRAFT Lttr HBC ECHA Public Consult v2.0 29 Apr 2022.pdf	
4906 2022/05/02	GDKE Rheinland-Pfalz, Direktion Landesarchäologie, Regional or local authority, Germany	*Confidential attachment removed*	
4907			

2022/05/02	C. DUBON Créations Verre, Company, France	4907_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf	
4908 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4908_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4909 2022/05/02	Individual, Germany	4909_Musterbrief_zur_freien_Verwendung_Aenderung.pdf	
4910 2022/05/02	BDMP, International organisation, Germany	4910_BDMP_ECHA_ANNEX_XIV_Endfassung.pdf	
4911 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4911_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4912 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4912_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4913 2022/05/02	Signode Sweden AB, Company, Sweden	4913_ECHA - Comments on the draft recommendation for lead 220427.pdf	
4914 2022/05/02	Federal-Mogul Wiesbaden GmbH - A Tenneco Company, Company, Germany	Please refer to "Section II: Transitional arrangements" of the attached document "Public_Version_Lead_Consultation_I_Tenneco.pdf" 4914_Public_Version_Lead_Consultation_I_Tenneco.pdf *Confidential attachment removed*	Please see references to responses in section I
4916 2022/05/02	Glasmalerei Peters, Company, Germany	4916_SNeuenbeken22050216130.pdf	

4917 2022/05/02	Individual, Belgium	4917_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	Please see response to comment # 4330
4918 2022/05/02	Atelier Vitrail du Mont Royal, Company, France	If ever the lead had to be registred, the deadlines for the stained glass windows are much too short 4918_2022.04.25 - CNSV - Réponse consultation ECHA - Contribution anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4919 2022/05/02	Individual, Germany	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. 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. 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. 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. (https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/) 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. 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.” 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. Inclusion of lead in Annex XIV shall nearly automatically render vast majority of firearms designed for lead	**A.2.05: Use or sector specific arguments on the prioritisation of lead for its inclusion in Annex XIV** **B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects** **C.2.07 Exemption for uses necessary in the interests of defence/military uses**

		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. 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. 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.	
4922 2022/05/02	Glasmalerei Peters, Company, Germany	4922_SNeuenbeken22050216230.pdf	
4923 2022/05/02	Glasmalerei Peters, Company, Germany	4923_SNeuenbeken22050216231.pdf	
4924 2022/05/02	ABB AG, Company, Germany	The Service life of products is typically 15 years for Variable Speed Drives. Requirement for spare- and maintenance parts availability is following product Service life period. Service life is period after serial production has seized following the Life Cycle Management model. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verity the changes against technical design specifications and relevant Regulations, Standards and directives. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation” *Confidential attachment removed*	Please see response to comment # 4239
4925 2022/05/02	Glasmalerei Peters, Company, Germany	4925_SNeuenbeken22050216290.pdf	
4926 2022/05/02	Glasmalerei Peters, Company, Germany	4926_SNeuenbeken22050216300.pdf	
4927 2022/05/02	Glasmalerei Peters, Company, Germany	4927_SNeuenbeken22050216302.pdf	
4928 2022/05/02	Glasmalerei Peters, Company, Germany	4928_SNeuenbeken22050216301.pdf	

4929 2022/05/02	Aerospace Industries Association (AIA), Industry or trade association, United States of America	As has been previously communicated via other chemical substance consultations under REACH, the A&D sector requires a significant amount of time to qualify, certify and industrialise alternative materials, involving alignment with a very broad base of uses and supply chain actors pertaining to its low volume yet critical uses. Therefore, should elemental lead move in to Annex XIV, it requests a minimum of 24 month before the LAD. In accordance with ECHA's general responses on issues commonly raised in consultations on draft recommendations document, Section B.1.2.1 Page 11 (March 2020), based on ECHA's approach, substances with more complex supply chains and likely higher number of uses will normally be allocated to the "later" latest application date slots (i.e., 21 or more months after the inclusion in Annex XIV).	**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** **B.2.01. Request extra long LAD**
4930 2022/05/02	WindEurope Asbl, Industry or trade association, Belgium	Under Article 58(1)(c) of the REACH Regulation, a decision to include a SVHC in Annex XIV must indicate the transitional arrangements, i.e., (i) the date from which the placing on the market and the use of the substance shall be prohibited unless an authorisation is granted (the so-called "sunset date"); and (ii) a date or dates at least 18 months before the sunset date(s) by which applications must be received if the applicant wishes to continue to use the substance or place it on the market for certain uses after the sunset date(s) (the so-called "latest application dates" or "LAD"). ECHA takes into consideration the following elements when setting transitional arrangements: • Its own capacity to handle applications; • The time applicants will need to get organised and prepare the applications for authorisation; • The structure and the complexity of the supply chain; • The type of applicant (registrant v downstream user). The draft background document for lead proposes the following transitional arrangements:	Please see response to comment # 4114

		• Latest application dates: date of inclusion in Annex XIV plus 18, 21 or 24 months; • Sunset date: 18 months after the latest application date. Should the ECHA Member State Committee ("MSC") decide to recommend lead for inclusion in Annex XIV, WindEurope believes the earliest possible LAD would be, 36 months from the date of inclusion of lead in Annex XIV. This extended LAD is also in line with ECHA's general responses on issues commonly raised in consultations on draft recommendations (page 11), whereby substances with likely high number of uses will be allocated to the later latest application dates. This because the Authorisation requirement will affect a high number of cables that use internal lead sheathing. Giving appropriate transitional timelines is key to ensure that the Annex XIV entry does not endanger European manufacturing or adversely impact the supply of and access to renewable electricity. In addition to the general need to ensure appropriate transitional arrangements, the cable industry is focussing on development lead-free alternatives. But a potential preparation of an Application for Authorisation, running in parallel to the substitution R&D projects, would put added pressure on the cable manufacturer, divert personnel and financial resources away from innovation, and therefore delay the needed alternatives. Inclusion of lead in Annex XIV will likely lead to a proliferation of Applications for Authorisations especially because the industry experience in other sectors has demonstrated that the feasibility of upstream Applications for Authorisations is often limited. This means that each end-user or group of end-users will submit separate Applications for Authorisations. For example, in the case of lead sheathed cables, there could be an Application for Authorisation from cable manufacturers to use lead in the production of lead sheathed cables, an Application for Authorisation from the installers of lead sheathed cables and an Application for Authorisation from the entities responsible for the repair of installed lead sheathed cables. Considering the wide range of uses of lead; the number of substances that will be likely included in the final 11th recommendation; and the number of substances that have been included in the 10th recommendation for prioritisation in 2021, one can question whether the ECHA's Committee for Risk Assessment ("RAC"), the Committee for Socio-Economic Analysis ("SEAC"), as well as the general Secretariat will have the capacity to assess the many applications for authorisations that may be submitted in short timeframes. This would probably lead to significant delays in handling the applications and effectively lead to either an absolute restriction (in case no applications are handled) or market distortions (if only a handful of random applications can be handled). With regard to the sunset date WindEurope supports a prolonged date of 30 months for the use of lead metal sheaths in subsea high-voltage cables. In view of the current exceptionally circumstances and in consideration of the role lead sheathed cables play in the overall EU renewable energy network. This longer sunset date is also	

		justified by: • The long transitional period to deploy the alternatives in the offshore energy grid; • The EU's overall decarbonisation goals, and its associated increase in demand for offshore and interconnection projects; and • The R&D investment Europacable members will need to undertake in order to complete substitution and qualification successfully. As mentioned, cable manufacturers are working lead-free cable designs. But substitution of internally lead sheathed cables with lead-free alternatives is unlikely in the short-term. R&D time can take up to 10 years. On top of the R&D the test programmes to qualify a newly developed cable design takes up to 18 months, according to the CIGRE 490 guideline. In addition, trends in the offshore wind sector for bigger projects located farther from shore pose additional barriers to market acceptance of innovative cable designs. Should lead be included in Annex XIV longer LAD and sunset dates will prove to be essential to execute the transition in the best possible way. As rushing technology developments and market deployment would lead to inadequate solutions which would increase outages and repair costs.	
4931 2022/05/02	Commission Internationale Permanente pour l'épreuve des armes à feu portatives - C.I.P. - , International organisation, Belgium	4931_CIP opinion on Annex XIV draft_2_May 2022_Final_rs.pdf	
4932 2022/05/02	Landschaftsverband Westfalen Lippe (LWL), Regional or local authority, Germany	4932_02052022_European Chmicals Agency_Blei.pdf	
4933 2022/05/02	L'Atelier du Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4933_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4935 2022/05/02	Individual, Germany	Bleimunition für den Schießsport sollte ausgenommen werden: Direkte Auswirkungen für den Schießsport • Um gleiche oder ähnliche Geschossgewichte mit anderen Materialien beizubehalten, bedeutet dies für Geschosshersteller, dass längere Geschosse benötigt werden. Das bedeutet, dass es schwierig sein wird, Munition herzustellen, die den angegebenen Abmessungen für die Kaliber entspricht. • Dies führt direkt zu gefährlichen überhöhten Druckverhältnissen. Da längere Geschosse mit gleichen	Please see response to comment # 4287

		Außenmaßen dazu führen, dass das Geschoss tiefer im Gehäuse sitzen muss, kann es zu gefährlichem Überdruck kommen. • Längere Geschosse erfordern einen engeren Drall, um sich zu stabilisieren. Dies bedeutet, dass bestehende Waffen entweder an Genauigkeit verlieren oder neu gebohrt werden müssen. Bei Schusswaffen mit historischem Wert ist dies nicht möglich. Für andere Schusswaffen ist es " nur teuer „. • Potenzielle (zu vernünftigen Kosten verfügbare) Ersatzmaterialien sind härter, was zu einem deutlich erhöhten Laufverschleiß führt. Man kann dies überwinden, indem man „kleinere" Kugeln verwendet. Dies bedeutet aber geringere Präzision. Beim Sportschießen ist die Genauigkeit ein sehr wichtiger Punkt. • Das einzige „vernünftige" Material mit einem gewissen Ersatz für Blei ist BISMUT (auch bezeichnet als Wismut, Wismuth). BISMUT ist jedoch eine Art Nebenprodukt des Bleiabbaus. Wenn niemand mehr Blei aus dem Boden extrahiert, wird auch Bismut als Nebenprodukt nicht verfügbar sein. Der Preisunterschied zwischen Blei und Bismut könnte aktuell etwas geringer sein, aber der Preis wird in die Höhe schnellen, sobald Blei verboten wird. • Der Preis der Munition wird definitiv in die Höhe schnellen. Für Jäger mag dies nicht unbedingt das Ende der Welt bedeuten, aber für Sportschützen, die Hunderte von Patronen pro Woche abschießen, ist das so ziemlich das Ende des Sportschießens. • Im Rahmen dieser Einschränkungen wird auch vorgeschlagen, das Gießen von Bleigeschossen zu Hause zu verbieten, d.h. kein Schwarzpulverschießen mehr oder beispielsweise Cowboy Action Shooting (CAS). 4935_Pro-und-Kontra-zum-Bleiverbot.pdf	
4936 2022/05/02	VdR Verband der Restauratoren, Other contributor, Germany	4936_Request for exemption REACH Annex XIV, EC No 231-100-4 .pdf	
4937 2022/05/02	KMBL Konferenz der Museumsberater der Länder, Regional or local authority, Germany	4937_Votum KMBL ECHA.pdf	
4938 2022/05/02	Individual, Finland	Lifecycle of a product on Motors and Generators is typically 20 years with sparepart availability to be ensured years after EOL of product range. Manufacturing units would required extensive amount of time to ensure that whole logistics and value chain can reach a lead free status beginning from production of raw materials to parts used in assembly process. Manufacturing units would need to have 10 years of LAD and sunset time to ensure availability of lead free parts from both 3rd parties and suppliers. Additionally any new part or logistics chain alteration would require extended work to approve, implement and verify new parts and recertify products on various regulations and standards. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation".	Please see response to comment # 4239

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4939 2022/05/02	MAK - Österreichisches Museum für angewandte Kunst, Other contributor, Austria	 4939_Brief_Blei_signed.pdf	
4940 2022/05/02	Glasrestaurierung Sterzing, Company, Germany	 4940_Glasrestaurierung_Sterzing_Bitte_Ausnahmeregelung_Blei.pdf	
4941 2022/05/02	Glasrestaurierung Sterzing, Company, Germany	 4941_Glasrestaurierung_Sterzing_Bitte_Ausnahmeregelung_Blei.pdf	
4942 2022/05/02	Kreisagrarmuseum Dorf Mecklenburg, Other contributor, Germany	 4942_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (DM).pdf	
4943 2022/05/02	Gorduna vzw, National NGO, Belgium	 4943_recom_com_call_for_info_questionnaire-Gorduna_vzw.pdf	
4944 2022/05/02	Individual, Luxembourg	see attachment 4944_lettre_european_blei.pdf	Please see response to comment # 3585
4945 2022/05/02	Atelierhaus Rösler-Kröhnke, Other contributor, Germany	 4945_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (KB).pdf	
4947 2022/05/02	Individual, Germany	 4947_2022-05-02_Protest Bleiverbot.pdf	
4948 2022/05/02	ets pinon severine, Company, France	if ever the lead had to be registered, the deadlines for the stained-glass window are much too short 4948_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

4949 2022/05/02	Landesfachstelle Museum, Museumsverband in Mecklenburg-Vorpommern e. V., Other contributor, Germany	4949_Votum für Ausnahmeregelung für Bleiverwendung bei Kulturerbeerhalt (mvmv).pdf	
4950 2022/05/02	Individual, Belgium	4950_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4951 2022/05/02	WirtschaftsVereinigung Metalle. e.V., Trade union, Germany	WVMetalle rejects in principle an authorisation requirement under REACH for lead(metal). In this context, we support the position of the International Lead Association (ILA). However, if an approval can no longer be averted, we call for the longest possible deadlines for Latest Application Dates (LAD) and Sunset Dates. In general, the results of the REACH revision process should be awaited.	**B.2.01. Request extra long LAD B.2.05 Due to REACH review more time needed to prepare AfA** Please see response to comment # 3856
4952 2022/05/02	Individual, Germany	4952_2022-05-02_Protest Bleiverbot Helsinki.pdf	
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] 4953_Letter_to_ECHA_english.pdf	Please see response to comment # 3740
4954 2022/05/02	L'ATELIER DU VITRAIL, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4954_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4956	Monumenta,		

2022/05/02	National NGO, Spain	4956_ECHA_Lead_ICOMOS_ICOM_ECCO_lettertemplate_EN (004)_MONUMENTA-BONET.docx	
4957 2022/05/02	Michel Pradeilles - Vitrail de l'Ange, Company, France	4957_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	
4959 2022/05/02	Individual, Germany	4959_220502_ECHA_Blei_deu.pdf	
4960 2022/05/02	Union der deutschen Akademien der Wissenschaften, Academic institution, Germany	4960_2022_05_02_European Chemical Association.pdf	
4961 2022/05/02	Individual, Germany	4961_220502_ECHA_Lead_engl.zip	
4962 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4962_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4963 2022/05/02	Bayerischer Jagdverband e.V., National NGO, Germany	4963_BJV Comments_recommendations.zip	
4964 2022/05/02	Erkenbert-Museum Frankenthal (Pfalz), Other contributor, Germany	4964_EBM Protest_Bleiverbot Kopie 2 (1).docx	
4965 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4965_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4966 2022/05/02	URGENCES PATRIMOINE, Other contributor,	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4966_Urgences Patrimoine - Observations Consultation.pdf	

	France		Please see response to comment # 3862
4967 2022/05/02	Atelier Couleurs Vitrail, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4967_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais (1).pdf	Please see response to comment # 3862
4970 2022/05/02	Institut National des Métiers d'Art , Other contributor, France	 *Confidential attachment removed*	
4971 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
4972 2022/05/02	L'en Verre de Décor, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4972_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	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], Academic institution, Switzerland	 4973_Letter of Support.pdf	
4974 2022/05/02	Individual, Ireland	 4974_The European Chemicals Agency.docx *Confidential attachment removed*	
4975 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4975_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
4978 2022/05/02	Individual, Belgium	4978_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4979 2022/05/02	ABB AB, Company, Sweden	Lifecycle of a product on Motors and Generators is typically 20 years with sparepart availability to be ensured years after EOL of product range. Manufacturing units would required extensive amount of time to ensure that whole logistics and value chain can reach a lead free status beginning from production of raw materials to parts used in assembly process. Manufacturing units would need to have 10 years of LAD and sunset time to ensure availability of lead free parts from both 3rd parties and suppliers. Additionally any new part or logistics chain alteration would require extended work to approve, implement and verify new parts and recertify products on various regulations and standards. For more details refer to document attached in “Confidential Attachment to comments on ECHA's draft recommendation”. *Confidential attachment removed*	Please see response to comment # 4239
4980 2022/05/02	Protestant Church in Germany (EKD) - Brussels Office, Other contributor, Germany	4980_2022-05-02 Stellungnahme EKD.pdf	
4981 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4981_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4982 2022/05/02	Hungarian Hunters’ National Chamber, National NGO, Hungary	Subject: Inclusion of lead in Annex XIV of REACH regulation Dear Madam/Sir, 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	Please see response to comment # 4826

		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. 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. 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. 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. 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. (https://www.all4shooters.com/en/hunting/ammunition/eu-echa-and-restrictions-on-lead-public-consultation-is-still-open-until-may-2-2022/) 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. 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.” 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.	

		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. 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. 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. 10. Approximately 400,000 big game are harvested in Hungary every year, and hunting is almost occures 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 indrease 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 4982_ECHA letter_OMVK_HU 20220502.docx	
4983 2022/05/02	ABB AB, Company, Sweden	The Service life of our Products (Large Motors and Generators) is typically 20 to 30 years. There is requirement for spare- and maintenance parts availability during product Service life period. Phasing of LAD and sunset dates with proper transition period of minimum 10 years in value chain are required to allow complex and very complex object manufacturers to plan, implement and verify the changes against technical design specifications and relevant Regulations, Standards and Directives. For more details refer to document attached in "Confidential Attachment to comments on ECHA's draft recommendation". *Confidential attachment removed*	Please see response to comment # 4239
4984 2022/05/02	Sachverständigenbüro Dr. Ivo Rauch, Company, Germany	Please see attached pdf file with comments 4984_Exemption for lead_RAUCH_ECHA.pdf *Confidential attachment removed*	Please see response to comment # 3585
4985 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 4985_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4987 2022/05/02	Individual, Belgium	4987_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4988 2022/05/02	Individual, Belgium	4988_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
4989			

2022/05/02	Fédération Française du Bâtiment, Industry or trade association, France	4989_Réponse FFB Consultation plomb ECHA .pdf	
4990 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4990_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4991 2022/05/02	Individual, France	o If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4991_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4992 2022/05/02	Individual, Belgium	 4992_Versicolore.pdf	
4995 2022/05/02	Atelier vitrail lepoutre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4995_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
4996 2022/05/02	Individual, Belgium	Garder l'usage du plomb pour la fabrication et restauration des vitraux	**A.1.5.2. Authorisation is disproportionate and/or means a ban C.1.3. Aspects not justifying an exemption from authorisation**
4997 2022/05/02	Individual, Germany	 4997_Response REACH directive lead OMC CC and CH.pdf	

4998 2022/05/02	ATELIER VITRAIL HIPPOCAMPE CELINE BOISTEAU, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 4998_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
4999 2022/05/02	Fondation pour le Vitrail Pierre et Marcelle Majerus Nizet, Company, Belgium	If ever the lead had to be registered, the deadlines for the stained glass window are much too short *Confidential attachment removed*	Please see response to comment # 3862
5000 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5000_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5001 2022/05/02	Studio Vitrail Bianconi , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5001_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5002 2022/05/02	Individual, Austria	5002_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5003 2022/05/02	Individual, Germany	5003_Marx_ECHA_(deutsch).docx	
5004 2022/05/02	Studio Vitrail Bianconi , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5004_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5005 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 5005_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

			Please see response to comment # 3862
5006 2022/05/02	Individual, Austria	5006_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5007 2022/05/02	Individual, Czech Republic	5007_Musterbrief_Protest.docx	
5008 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5008_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5009 2022/05/02	Individual, Belgium	5009_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5010 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5010_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5011 2022/05/02	Individual, Belgium	If ever the lead had to be registered , the deadlines for the stained glass window are much too short 5011_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5012 2022/05/02	Individual, Czech Republic	5012_Milan Masojidek - Letter to ECHA about lead and stained glass.docx	
5016 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 5016_2022.04.25. - CNSV - Reponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

5017 2022/05/02	Atelier für Steinrestaurierung, Company, Germany	5017_Andreas Muth, D-08066 Zwickau, Verwendung von Blei bei der Restaurierung von Kunst- und Kulturgut.pdf	
5018 2022/05/02	laure cornil, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5018_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5019 2022/05/02	Landschulmuseum Göldenitz, Company, Germany	5019_Gefahr für Kulturerbe- Unterschriftexemplar.pdf	
5020 2022/05/02	Individual, Italy	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5020_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais 7.pdf	Please see response to comment # 3862
5021 2022/05/02	Individual, Belgium	5021_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5022 2022/05/02	TEPPFA aisbl, Industry or trade association, Belgium	5022_Authorisation of Lead. TEPPFA position. Final.pdf	
5023 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are way too short 5023_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5024 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5024_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862

5026 2022/05/02	Individual, Germany	Wir brauchen gute, funktionierende und bezahlbare Munition als Sportschützen. In abgeschlossenen Bereichen wie ein Schiessstand Ist die Gefahr für die Umwelt sehr gering und beherrschbar. Absolut unnötige Überregulierung.	**A.1.5. Aspects not considered in ECHA's prioritisation A.1.5.2. Authorisation is disproportionate and/or means a ban A.1.5.3. Use specific considerations A.1.5.4. Control of risks A.1.5.5. Availability of suitable alternatives**
5027 2022/05/02	Individual, Belgium	5027_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5028 2022/05/02	Individual, Germany	5028_EU-Verbot Blei Finnland.pdf	
5029 2022/05/02	ARTIS, Other contributor, France	5029_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	
5030 2022/05/02	le chant du diamant, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5030_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5031 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5031_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862

5032 2022/05/02	Technikrestaurierung Martin Möbus, Company, Germany	5032_Martin Möbus Stellungnahme zu geplantem Bleiverbot in der EU.doc	
5034 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5034_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5035 2022/05/02	Ecklat-Atelier verre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 5035_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5036 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5036_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5038 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5038_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5039 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5039_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5040 2022/05/02	Atelier DADA, Regional or local authority, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5040_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862

5041 2022/05/02	SPECTARIS e.V., Industry or trade association, Germany	• LAD: Should be as late as possible to consider availability and suitability of alternatives. • Expiration date: It should be considered to deviate from the ECHA recommendation and extend the time between LAD and expiration date. This is owed to the fact that lead is widely used in many applications, processes, components and articles. The complexity of supply chains must be considered. • Lead / Pb is already part of ROHS with known exemptions. There should not be any contradictory ruling.	**A.2.06 Question the added value of the authorisation requirement, stress the risk of double regulation and ask for regulatory coherence** **A.2.10 Requirements under RoHS and ELV mirror substitution objective of REACH authorisation** **B.1.1. General principles for setting latest application dates/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.1.2.2. Lack of alternatives, socio-economic aspects **B.2.01. Request extra long LAD** **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**
5042 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5042_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5043 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5043_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5044 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5044_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862

5045 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5045_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5046 2022/05/02	Individual, Belgium	5046_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore (1).pdf	
5047 2022/05/02	Individual, Belgium	5047_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5048 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5048_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5049 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are far too short 5049_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5050 2022/05/02	Bénédicte Lacheré, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short	**B.1.2. Aspects not considered by ECHA when proposing latest application dates/sunset dates** **B.1.2.2. Lack of alternatives, socio-economic aspects**
5051 2022/05/02	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5051_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	

		Confidential attachment removed	Please see response to comment # 3862
5052 2022/05/03	The Stained Glass Association of America, Industry or trade association, United States of America	5052_2022 Letter from the SGAA.pdf	
5054 2022/05/03	Individual, 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
5055 2022/05/03	Dept of Archaeology, Durham University, Academic institution, United Kingdom	5055_Lead-authrizationletter (002).docx	
5056 2022/05/03	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5056_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5057 2022/05/03	À la lumière du verre, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5057_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5058 2022/05/03	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5058_2022.04.25. - CNSV - R├®ponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5060 2022/05/03	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5060_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	

		Confidential attachment removed	Please see response to comment # 3862
5061 2022/05/03	Individual, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5061_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf *Confidential attachment removed*	Please see response to comment # 3862
5062 2022/05/03	Individual, Germany	see PDF-file attached *Confidential attachment removed*	Please see references to responses in section I
5063 2022/05/03	Cocoroca , Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short 5063_2022.04.25. - CNSV - RÃ©ponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5064 2022/05/03	Atelier Audrey Rogers, Company, France	If ever the lead had to be registered, the deadlines for the stained glass window are much too short. 5064_2022.04.25. - CNSV - Réponse consultation ECHA - Contribution Anglais.pdf	Please see response to comment # 3862
5065 2022/05/03	Individual, Germany	see PDF-file attached *Confidential attachment removed*	Please see response to comment # 5062
5068 2022/05/03	Individual, Belgium	 5068_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5069 2022/05/03	Individual, Belgium	 5069_CONTRIBUTION-TO-THE-PROPOSAL-MADE-BY-ECHA-TO-INCLUDE-LEAD-IN-ANNEX-XIV-By-Atelier-Versicolore.pdf	
5070	Historisches Museum Aurich,	 5070_Ausnahmeregel Blei in Kunst und Museen_HMA 2022.pdf	

2022/05/03	Company, Germany		
5071 2022/05/03	Individual, Germany		
		5071_denkmal-und-farbe.pdf *Confidential attachment removed*	