*[Please modify and adapt this draft as you wish]*

**Important – upload the letter at the latest by 2 May 2022 under the following two public consultations:**

1. <https://comments.echa.europa.eu/comments_cms/InclusionRecommendation.aspx?substancename=Lead&ecnumber=231-100-4>
2. <https://comments.echa.europa.eu/comments_cms/CallForInfo.aspx?substancename=Lead&ecnumber=231-100-4>

INSERT

*[Letterhead of organisation if possible*

*Sender: name, institution/organisation,*

*Address, Country] [date ]*

For the attention of:

Mr. Shay O’Malley

Acting Executive Director

The European Chemicals Agency (ECHA)

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Ms. Mariya Gabriel

Commissioner for Innovation, Research, Culture, Education and Youth

European Commission

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**Subject:** **ECHA's plan to include lead in the list of substances subject to authorisation**

**(Appendix XIV of the REACH Regulation)**

Dear Madam/Sir,

*[I/Name of organisation]* wish to raise *[my/our]* severe concerns about the European Chemicals Agency’s (ECHA) plan to include the material lead in Appendix XIV (Authorisation List) of the REACH Regulation. This would not only pose a major threat to the conservation, maintenance, presentation and even the creation of a large number of art and cultural objects, but would also destroy the livelihoods of countless conservator-restorers, craftsmen and artists, an economic, cultural and social impoverishment on a massive scale.

Lead is essential to a multitude of cultural heritage sectors, among other, organ building (production and repair of organ pipes); classical stonemasonry (filling material between stones, to cover stone sills, cornices and iron joints of stones); and historic roofing. Museums and heritage institutions care for a wide range of cultural goods containing lead – to name but a few : lead in bronze sculpture, Roman water pipes made of lead, lead sarcophagi from the early Middle Ages, medieval pilgrims' badges made of leaded pewter, toys, household articles (plates, cups, candlesticks...), medieval weights for nets (fishing) and fabric pilots (textiles), remains of industrial activity (metallic slag), medical/military equipment used to stop radiation (aprons, suitcases...), lead glazes on ceramics, lead glass, lead white in painting, coins, medals or weights, as well printing types or other printing elements. However, especially the art of stained glass and the restoration of Europe’s vast heritage of historic medieval to modern stained glass would be dramatically endangered by the inclusion of lead among the substances requiring authorization for use or handling.

Lead, cast, milled or extruded into lead cames or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris and Strasbourg (France); the cathedrals of Cologne and Naumburg (Germany); Brussels and Antwerp Cathedrals (Belgium); Canterbury Cathedral and York Minster (United Kingdom); Leon and Girona Cathedrals (Spain) and the National Cathedral of Washington DC (USA). Stained glass is part of the greatest treasures of museums including the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow) to name but a few. While leaded stained glass grew to cultural prominence in medieval Europe and enjoyed a massive revival in the nineteenth century, it is now practiced all over the world and has attracted modern artists of the international stature of Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistermann, Brian Clarke and Narcissus Quagliata.

Lead’s malleability, strength and sustainability over centuries means that its unique characteristics have remained irreplaceable as an integral part of stained glass manufacture. Without it the historic windows of our heritage sites, museums and historic houses could not be restored, conserved and preserved, making it indispensable to the continuance and preservation of this unique art form. It can also not be replaced by alternative materials in the other heritage sectors mentioned above.

The toxicity of lead is well-understood and its risks to health are very effectively managed by stained glass designers, fabricators and conservator-restorers all over the World. Regular blood testing, use of extraction system with appropriate micro-filtration and appropriate PPE ensures that the many thousands of people working in the profession do so safely and with minimal and well-mitigated risk. This is also the case for heritage professionals in the other sectors mentioned above.

*[I/We/Name of organisation]* strongly urge the ECHA and the European Commission to exclude the use of lead in the fabrication, conservation and restoration of stained glass and other cultural goods from its proposed ban. There is a need for an official and permanent regulation that the art and production of stained glass in particular, but also the use and handling of lead in other cultural heritage sectors, is permanently removed from the list or given a permanent exemption from the EU Chemicals Regulation and all directives on hazardous substances (e.g. 2011/65/EU).

* 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.

Not only would a ban wipe out the livelihoods of artists in glass, craftspeople involved in fabrication and conservator-restorers involved in the care of heritage assets in Europe, but its effects would be felt throughout the world, sealing the eventual death sentence of one of the most glorious art forms known to mankind. There is almost no part of the cultural heritage sector that would not be severely impacted by the inclusion of lead among the substances requiring authorization for use or handling.

Yours sincerely,

[SIGNATURE/NAME of INSTITUTION]