

Deutsche Gesellschaft für Kulturgutschutz e.V.



Seit 1993 dem Kulturgutschutz in Krisen- und Notsituationen verschrieben.
Mitglied der Internationalen Liga nationaler Gesellschaften für Kulturgüterschutz.



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Grimma, 01.05.2022

European Chemicals Agency (ECHA)
P.O. Box 400
FI-00121 Helsinki
Finnland

Subject: Request for exemption for the use of lead in designed windows, for the use of lead for the repair of lead roofs and facades and for the use of lead in the metal casting trade in relation to the proposed EU Regulation [REACH Annex XIV, EC number 231-100-4].

*Danger to our European cultural heritage and to the art form of stained glass
Danger to the destruction of the professional practice for stained glass artists and stained glass conservators
Danger for conservation work for lead roofs and facades
Danger to the destruction of the professional practice for metal casting trade*

Dear Ladies and Gentlemen,

the material lead, cast, drawn or cold-formed in the form of lead rods or rolled lead, is an indispensable and essential component in the manufacture and restoration of stained glass windows as well for the restoration of lead roofs and facades. Fixed at its intersections with solder, it forms a strong and durable base structure that can support coloured and painted glass and can seal cracks in facades and roofs.

Stained glass is an art form with a thousand-year-old history, found in world-famous buildings such as the cathedrals of Chartres, Notre Dame de Paris or Sainte Chapelle (France), the cathedrals of Cologne or Naumburg (Germany), the cathedrals of Brussels or Antwerp (Belgium), the Canterbury Cathedral or York Minster (United Kingdom), the cathedrals of Leon and Girona (Spain), or the National Cathedral in Washington DC (USA). Every sacred building in Europe is unimaginable without lead-framed windows.

Moreover, this art form is one of the greatest treasures of museums such as the Victoria and Albert Museum (London), the Metropolitan Museum (New York), the Schnuetgen Museum (Cologne) and the Burrell Collection (Glasgow), to name but a few examples.

Lead glazing reached a heyday as an art phenomenon in medieval Europe and experienced a major revival in the 19th century, it has inspired artists of international standing, such as Henri Matisse, Marc Chagall, Georges Braque, John Piper, Johannes Schreiter, Georg Meistemann, Brian Clarke,

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Narcissus Quagliata, Markus Lüpertz and Gerhard Richter. Even today, it is still practised all over the world.

Lead's malleability, strength and sustainability over centuries have made its unique properties irreplaceable as an essential component of stained glass. Without lead, the historic windows of our cultural monuments and museums could not be repaired, conserved and preserved. Moreover, no more great works of art could be created in this genre, making this material essential for the continuation and preservation of this unique art form.

The use of lead as an incorporation of metal alloys for bronze casting has been detectable since the Bronze Age. Lead changes the casting ability of the molten metal and can therefore only be poured into certain shapes. It is found as a component of bronze artifacts all over the world. Especially in the production of bronze figures, bronze bells and even bronze cannons, lead is an important and essential component.

The toxicity of lead is very well known and its health risks are effectively managed by professional stained glass artists, fabricators and conservators throughout the world. The use of, among other things, exhaust systems, appropriate personal protective equipment (PPE) and regular blood tests ensure that the many thousands of people who work in this industry do so safely and with minimal and carefully controlled risk.

We urge ECHA and the European Commission to exempt the use of lead in the manufacture, conservation, storage and display of stained glass, lead roofs and metal casting trade from the proposed ban. Such a ban would not only devastate the livelihoods of glass artists, craftsmen and restorers involved in the care of Europe's stained glass and metal heritage, but would also make it more difficult to maintain and display these works in museums, churches and public buildings. The effects of such a ban would be felt throughout the world and would ultimately mean the death knell for one of humanity's most beautiful art forms.

Yours sincerely

Irene Pamer-Gatzsche

Präsidentin der Deutschen Gesellschaft für Kulturgutschutz e.V.
(President German Society of Cultural Property Protection NGO)