

**Joint Statement by
ICOMOS, ICOM, E.C.C.O, ICOMOS-Corpus Vitrearum ISCCSG and ICOM-Glass**

on

**ECHA's plan to include lead in the list of substances subject to authorisation
(Appendix XIV of the REACH Regulation)**

Paris, 26 April 2022

We, the undersigned professional organisations in the field of the conservation, restoration, care, preservation and public presentation of cultural heritage, art and cultural artefacts, raise our severe concerns about the European Chemicals Agency's (ECHA) plan to include the material lead in Appendix XIV (Authorisation List) of the REACH Regulation. This would not only pose a major threat to the conservation, maintenance, presentation and even the creation of a large number of art and cultural objects, but would also destroy the livelihoods of countless conservator-restorers, craftsmen and artists, an economic, cultural and social impoverishment on a massive scale.

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 comes or strips, is an indispensable and intrinsic component in the fabrication and conservation of stained glass. Fixed at its intersections with solder, it creates a strong and long-lived matrix that supports coloured and painted glass. This is an art form with a thousand-year history, located in world famous heritage sites such as the cathedrals of Chartres, Notre Dame de Paris 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.

We 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.

Teresa Patricio
President of ICOMOS

Alberto Garlandini
President of ICOM

Elis Marçal
President of E.C.C.O

Ivo Rauch
President of the International Scientific
Committee for the Conservation of
Stained Glass (ISCCSG) of ICOMOS
and Corpus Vitrearum

Teresa Medici
Chair of the ICOM International
Committee for Museums and
Collections of Glass (GLASS)

This statement is being sent to:

Mr. Shay O'Malley
Acting Executive Director
The European Chemicals Agency (ECHA)

Ms. Mariya Gabriel
Commissioner for Innovation,
Research, Culture, Education and
Youth, European Commission

And uploaded on the following consultations:

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

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

The International Council on Monuments and Sites (ICOMOS) is a non-governmental, not for profit international organisation, committed to furthering the conservation, protection, use and enhancement of the world's cultural heritage. With over 11,000 members, 100+ National Committees, 30 International Scientific Committees and several Working Groups, ICOMOS has built a solid philosophical, doctrinal and managerial framework for the sustainable conservation of heritage around the world. As an official advisory body to the World Heritage Committee for the implementation of the UNESCO World Heritage Convention, ICOMOS evaluates nominations and advises on the state of conservation of properties inscribed on the World Heritage List. It shares an International Scientific Committee specialised on the conservation of Stained Glass with the Corpus Vitrearum.

Further information: www.icomos.org

The International Council of Museums (ICOM) is the only international organization of museums and museum professionals. It is committed to the research, conservation, continuation and communication to society of the world's natural and cultural heritage, present and future, tangible and intangible.

ICOM is a membership association and a non-governmental organization which establishes professional and ethical standards for museum activities. As forum of experts, it makes recommendations on issues related to cultural heritage, promotes capacity building and advances knowledge. ICOM is the voice of museum professionals on international stage and raises public cultural awareness through global networks and co-operation programs.

ICOM facts and figures: 45 000 professionals in 145 countries, 119 National Committees, 32 International Committees
Further information: www.icom.museum

E.C.C.O., the European Confederation of Conservator-Restorers' Organisations was established in 1991 by 14 European Conservator-Restorers' Organisations. It is a non-governmental, not for profit international organisation, currently representing close to 6.000 professionals within 22 countries and 25 members organisations, including one international body (IADA).

E.C.C.O. embodies the field of conservation of cultural heritage, both movable and immovable, aiming at the safeguarding of Cultural Heritage through high standards in the professional practice of Conservation-Restoration. It promotes a high level of training and strives for legal recognition of the profession, having established Professional Guidelines that cover all aspects of Conservation-Restoration practice: the definition of Profession, a Code of Ethics and Basic requirements for education in Conservation-Restoration.

Further information: www.ecco-eu.org