

**Minority position to the SEAC opinion  
on the suggested restriction on Lead and its compounds in jewellery**

by Janez Furlan, September 2011

The minority position is the following:

The derogation included in the opinion of SEAC is inconsistent because it includes vitreous enamels while it does not include categories 3 and 4 of crystal as defined in the Directive 69/493/EEC. Categories 1 and 2 of crystal from the above mentioned Directive, derogated by the SEAC opinion, contain respectively 30 % and 24 % of lead, while groups 3 and 4 containing below 10 % of lead were not included in the derogation.