

**UK response to the ECHA consultation:
*Use of cadmium in spectacle frames***

May 2012

Thank you for inviting our comments on this consultation.

The Optical Confederation represents the 12,000 optometrists, the 6,000 dispensing opticians and 7,000 optical businesses in the UK who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of the five optical representative bodies: the Association of British Dispensing Opticians (ABDO); the Association of Contact Lens Manufacturers (ACLM); the Association of Optometrists (AOP); the Federation of Manufacturing Opticians (FMO) and the Federation of Opticians (FODO). As a Confederation, we work with others to improve eye health for the public good.

This response has been submitted through European Council of Optometry and Optics (ECOO).

Consultation Questions

The following questions have been shared with the ECOO's members.

- (a) Has cadmium been intentionally used in the EU area in the production of spectacle frames (either intended for medical glasses or sun protection and any other type of glasses)?
- (b) Are spectacle frames containing cadmium imported to EU countries, to your knowledge? (If not, is there any testing applied by Industry to ensure that no cadmium is used in such type of imported products?). This question relates to the fact that specific Asian companies advertise spectacle frames, which contain cadmium (one of which claiming that it exports their products to Eastern and Western Europe);
- (c) If cadmium is used in spectacle frames (either produced in the EU or imported), would a potential restriction in the placing of the EU market of such cadmium containing devices cause any socio-economic implications for you? (E.g. cost impacts due to a potential restriction of cadmium in these applications?)

<p>Optical Confederation Response (UK)</p>	<p>a) Optical Confederation members fit and supply millions of spectacle frames to the UK market every year. A very small percentage of these contain cadmium. Where it does appear in spectacle frames, cadmium levels range from 5ppm (parts per million) to 100ppm, which is within the REACH regulations on cadmium and current standards. We would like to add that we are unaware of any adverse reactions to its use.</p> <p>b) Yes, as stated above a very small percentage of spectacle frames on the UK market contain cadmium. We can confirm that there is a test regime in place to which all frame batches are subject to ensure that they comply with the REACH regulations.</p> <p>c) Given that cadmium is present in some spectacle frames (albeit a small number), there would be a cost involved in removing cadmium containing spectacle frames from the market. Furthermore banning the use of cadmium would add costs to the supply chain for the optical sector (e.g. additional processes to ensure all frame batches are compliant – which would not be an insignificant task) without any need for such action.</p> <p>Additional such costs would add to the cost of providing spectacles frames to our patients and would increase the price they pay. For this reason, we would oppose restricting the use of cadmium unless there is any new evidence that harm may be caused.</p>
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This response has been prepared by Mark Nevin on behalf of the Optical Confederation, for further information please contact mark@fodo.com