

Dear [MPs name],

I am writing to you [as an independent/employed stained glass worker/artist / on behalf of .....] concerning the proposed changes to Control of Lead at Work Regulations 2002 (CLAW) by the Health and Safety Executive (HSE), which aim to significantly reduce the permitted levels of lead (Pb) in workers' blood.

Regulations aim to ensure that everyone working with lead does so in a safe controlled manner through an approved code of practice. Part of this is required biological monitoring with defined 'action' and 'suspension' blood-lead levels that employers and employees both have a responsibility to adhere to. If an employee reduce it. If an employee is at or above the 'suspension' level, an employer must suspend them from working with lead until the level is reduced. The HSE has recently undergone a long overdue review and made the following proposed changes to the levels, due to come into force in 2027.

	ACTION LEVEL			SUSPENSION LEVEL		
Category	Current Action Level	First incremental change 1 <sup>st</sup> Oct 2027	Second incremental change 1 <sup>st</sup> Oct 2029	Current Suspension Level	First incremental change 1 <sup>st</sup> Oct 2027	Second incremental change 1 <sup>st</sup> Oct 2029
General Employees	50	20	10	60	30	15
Women of reproductive capacity	25	5	n/a	30	7.5	n/a
Young Person (16-17 years)	40	20	10	50	30	15

The proposals appear to be an overcorrection to make up for 25 years of inaction. Industry have challenged this review and in response HSE have opened consultation for stakeholders to make comment on at: <https://consultations.hse.gov.uk/hse/control-lead-at-work-regs-2002-exposure-guidance/>

Launched on 30th March and running until 24th May 2026, the consultation has coincided with the run-up to local elections, making it very hard to navigate successfully.

Consultation seeks views on substantially lowering the allowable blood-lead exposure levels within the workplace for two groups: General Employees and Women of Reproductive Capacity. It also proposes removing the level for Young Persons, absorbing them into the General Employees category.

Whilst we fully support improving occupational health by reducing lead exposure. The HSE appears to be either overlooking or ignorant of the amount of general lead exposure the population have from their environment, not just those with direct lead contact. Historic pipework, pre-1970s houses and legacy environmental soil contamination from industry and use of leaded petrol all mean that it is highly unlikely that anyone, living anywhere in the UK, has a lead level of 0. These background levels are often higher than the new proposed levels without any contact with lead. It is unlikely that someone without a history of direct lead contact and with a higher background level is going to be able to reduce it even with a thorough investigation into their private life and living situation. Furthermore, it is highly unreasonable to make an employer responsible for this.

Strict mitigation strategies, especially for pregnant workers and those with young children, are already in place along with

extensive use of personal protective equipment (PPE); these proposed lower thresholds will be very difficult or in some cases impossible to achieve consistently and may result in numerous unforeseen negative consequences.

The impact of the proposed changes would prove particularly catastrophic within the heritage / conservation–restoration sector, where complex building environments often limit our ability to implement certain control measures as stringently as in more industrial type settings. In disciplines such as historic metal sculpture or stained glass conservation, lead-based materials are intrinsic to the objects and buildings being preserved, and viable alternatives to lead simply do not exist. Even with robust controls and best-practice mitigation in place, the proposed lower thresholds appear unattainable in real world conservation practice. Creative artists and those working to make new windows face the same challenges.

Many of these highly skilled, yet increasingly rare, disciplines are already on the brink of collapse. Historic stained glass window making, is already classed as 'endangered' by the Heritage Crafts Association and included in its annual Red List of Endangered Crafts. This is due to serious concerns that it may not survive to the next generation. Implementation of the HSE's new, unattainably low blood lead suspension thresholds in 2027–2029 could quite possibly mark the end of this over-1000-year-old craft within the UK. Many of the few existing practitioners of the craft have already expressed concerns that they will struggle to comply with the proposed lower blood lead levels and will therefore be forced to stop practising or passing on their specialist skills.

From the perspective of the wider public, the most obvious impact from this will be the disastrous effect that it will have on our historic built environment, and in particular the impact on our ecclesiastical heritage. Within the UK there are over 12,000 churches which are listed as having special architectural or historic interest. Many of these buildings contain exquisite leaded stained glass, lead sculpture, roofs and rainwater goods, which are unique to the built environment of the UK, drawing in tourists from all over the world. If these proposals go ahead, the full extent of the deleterious impact to the nation's heritage is difficult to comprehend. Without stained glass practitioners or suppliers of appropriate lead-based materials, many of these windows would fail within a few decades. This would apply to every single stained glass window within every single church in the country. As historic stained glass windows cannot simply be replaced with modern materials because of listed building legislation, it is not too much of a stretch of the imagination that many of our churches would be forced to close owing to the risks associated with unstable leaded windows or leaking roofs which cannot be fixed. This is just one example of unintended consequences within the heritage field – there are many, many more.

However, arguably of more concern with the HSE proposals is how they would disproportionately impact 'Women of Reproductive Capacity' (WRC). In order to protect the health of any unexpected pregnancies, it is proposed that all WRC will need to comply with a suspension level threshold that is half that of male counterparts, whilst doing the same work. This particularly low threshold will be close to impossible to achieve for female practitioners working in specific areas of heritage conservation and stained glass, where they represent up to 50% of the

workforce, and appears to negate the basic human right of all women to have control over their own bodies. It will severely limit women's employability and companies will lose half their workforce almost overnight. To ensure parity across the sexes, I would also suggest that, for the great majority of 'non-pregnant' women, the same General Employee levels should be applied. The HSE's proposed 2027 lower action/suspension levels would obviously be appropriate for pregnant women.

This rather existential problem is being urgently looked at by the Institute for Conservation alongside bodies such as Historic England, the Church Building Council and the National Trust. We only have until 24<sup>th</sup> May 2026 to get as many people to respond and debate this issue as possible.

There are many other unintended consequences to consider, such as unemployment levels, the mental health of employees forced from a career they love, and the health benefits of stained glass for recreation and wellbeing, to name just a few.

We would greatly appreciate your support in this matter, enabling all parties to improve health outcomes, whilst also preserving equal employment opportunities for men and women alike, and indeed preserving the skills necessary to look after our considerable wealth of historic built heritage.

If you would like to discuss this further, or require further information, please don't hesitate to contact me at [.....]

Yours sincerely [name]