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FROM TARGET POLICY TO CIRCULAR ECONOMY: GLASS PACKAGING PIONEERING THE CIRCULAR ECONOMY BUSINESS MODEL

By having fully integrated recycled glass into its industrial processes since decades and advocating for separate collection systems of glass waste across the EU, the European Container Glass Industry is a pioneer of the circular economy.

Across the European Union, strong public-private partnerships are linking public authorities, the glass industry, value chain partners and consumers on a common project to maintain quality recycled material in the production loop, for maximum resource-efficiency. But still more needs to be done.

As we look into the future, with the presentation of the European Commission's Circular Economy Package, the industry is fully aware of the challenges ahead:

- Setting and reaching ambitious targets for recycling, in every Member State of the European Union;
- Maintaining Europe's leading position for glass production and recycling, in the context of increasingly competitive global markets;
- Improving production processes and the quality of the final product to provide sustainable glass packaging solutions for an expanding, global consumer market.

The Commission proposal provides a relevant framework to discuss these issues further with the European Parliament and Council. The European Container Glass Industry is ready to engage with policymakers to support the transition towards a resource-efficient Europe and ensure the availability of high quality secondary raw material for direct use in industrial production, while guaranteeing the free movement of glass packaging in the EU Internal Market.

As a result, FEVE, representing the European Container Glass Industry, calls on the European Parliament and Council to:

- Recognise the superior value of permanent materials for the Circular Economy
- Make separate collection of packaging mandatory across the EU to increase the quality of recycled material for industrial processes and food safety
- Maintain high targets for glass recycling, based on an accurate and harmonised calculation methodology

Recognise the superior value of permanent materials for the Circular Economy

Glass is a **permanent material**: it can be endlessly recycled, and once recycled does not lose any of its intrinsic properties. The prime characteristic of a permanent material is that it can remain in the same production loop without any degradation, making it an extremely valuable secondary raw material.

Permanent materials that can effectively replace raw materials in production processes and ensure that the same resources remain productive over and over again, offering a **stable, long-term perspective for resource-efficient manufacturing** and employment in recycling should be recognised and encouraged in the context of the waste and packaging legislation, and a specific strategy addressing permanent materials should be developed under the European Commission's Circular Economy Action Plan (CEAP) on secondary raw materials.

FEVE recommendations

- Recognition of the concept of permanent materials in the Waste Framework Directive (WFD) and in the Packaging & Packaging Waste Directive (PPWD);
- Recognition of the added value of permanent materials in terms of recyclability and eco-modulation of fees under the Extended Producer Responsibility (EPR) schemes;
- Development of an official status for permanent materials in the CEAP on secondary raw materials.

Make separate collection of packaging mandatory across the EU to increase the quality of recycled material for industrial processes and food safety

Setting up **recycling infrastructure** for container glass has sparked a glass recycling value chain that has contributed to **growth and jobs** in local areas, helping to collect an EU average of 73% of all post-consumer glass packaging and keep valuable resources out of landfills. More investments will be required in all Member States to ensure the separate collection, sorting and treatment of glass to guarantee a ready-to-use secondary raw material for the industry.

To ensure that recycled material is fully re-introduced into manufacturing, **separate collection schemes**, where glass is not collected with other materials, are absolutely **essential** for a circular business model. Separate collection schemes should be made mandatory across the EU and European funding streams must be geared towards exchange of best practice and the extension of the bottle bank concept for glass across all EU Member States.

Minimum requirements for **EPR schemes** are essential for the establishment of separate collection systems and to ensure quality partnerships for waste collection on national, regional and local level. We call for these **minimum requirements** to be specifically recognised under the PPWD. They should support the achievement of the targets defined for packaging materials and the costs should only cover the collection of waste that is separately collected to maintain an incentive for separate collection systems.

The European container glass industry welcomes **ambitious recycling targets** to keep glass continuously productive as well as **safe for food contact**, no matter how many times the material is recycled. Glass is an inert material which does not interact with other materials or substances. For these reasons, higher quantities of recycled glass put back in the production loop will not affect the primary role of glass packaging in preserving product characteristics and consumer health. In the CEAP, the European Commission must clearly address the risks

of increasing recycling rates in relation to the interface between chemicals, packaging and waste legislation.

FEVE recommendations

- No exemptions for Member States to implement separate collection systems for glass;
- The bottle bank for glass is a best practice scheme of separate collection and its extension should be encouraged and supported in all EU Member States;
- Minimum requirements for EPR schemes are essential to support separate collection for packaging waste and should be included under the PPWD;
- Address the risks of increasing recycling rates in relation to the interface between chemicals, packaging and waste legislation in the CEAP.

Maintain high targets for glass recycling, based on an accurate and harmonised calculation methodology

Glass features as one of the materials with the highest recycling targets for 2025 and 2030, respectively 75% and 85%. But the Circular Economy Package should not be a statistical race to meet targets. The **targets** and calculation method should be functional to the objective of driving progress in waste collection systems and infrastructure for more and **better quality recycled glass**.

Therefore, with regard to the calculation of the recycling rates, the European Container Glass Federation has the following observations:

- Targets should be re-assessed in the light of the measures finally agreed by the European Parliament and Member States;
- A harmonised measurement point for calculating the recycling rate is crucial, both between Member States and between different materials. Further clarity is needed in the PPWD as to what the “final recycling process” is for each material, and whether it is a relevant measure for reliable comparison;
- Further measurement points should be introduced to provide a full picture of the recycling value chain for each material stream: weight of material collected, weight of material after sorting, weight of material effectively recycled. Introducing different measurement points will support Member States in their transition to a real circular economy and raise awareness on gaps and weaknesses in the recycling value chain;
- We welcome the Commission proposal to exclude backfilling from the definition of recycling. If glass is used as aggregate material in other applications (e.g. construction, roads), the material is only recycled once and this is detrimental to a truly circular economy;
- Setting binding or optional targets for “preparing for re-use” or “re-use” of packaging in the PPWD is counter-productive on several levels:
 - Refillable markets are typically local, and setting a re-use target would create distortions and barriers to the free movement of goods in the internal market;

- Refillable systems are extremely costly and complex in terms of initial investments, as well as further management and logistics;
- The investments required create a market barrier for SMEs, who are forced to either invest massively or share the same packaging design with their competitors to pool resources;
- A reuse system would divert public investments away from recycling, putting at risk the many public-private partnerships that underpin the recycling value chain;
- Re-use of post-consumer packaging is not applicable to all packaging materials, and would therefore introduce a distortion between materials on the packaging market;
- Europe's competitive advantage and know-how in glass production would be seriously undermined by applying re-use targets for glass packaging.

FEVE recommendations

- Harmonised measurement point for all materials and across all EU Member States;
- Introduce additional points of measurement for collection, sorting and recycling to identify process cycle inefficiencies for all materials;
- Keep backfilling excluded from the definition of recycling;
- No binding or optional target for "re-use" or "preparation for re-use" of packaging.