

FEVE Recommendations on the Circular Economy Package

Glass is a permanent material. By having fully integrated glass recycling into its industrial processes since decades and advocating for separate collection systems of glass 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 with 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.

Our recommendations focus on four major issues for the industry and policymakers.

FEVE Position on the Calculation Methodology: “Recycling only”

Targets for **packaging waste** should focus on recycling and nothing else. Accounting for packaging “prepared for re-use” will artificially boost figures for some materials in the field of business-to-business packaging, and will divert attention away from improving separate collection and quality recycling where it is most needed: consumer packaging.

FEVE Position on Re-use: “No targets for packaging”

Specific targets on the re-use of packaging fail to take into account the dynamics of the packaging market:

- Re-use targets for packaging will only **help account for business-as-usual**: business-to-business, packaging is typically re-used. Setting a re-use target will therefore not bring about any changes to production and consumption patterns.
- Real step-changes in re-use policy should focus on supporting **re-use of consumer packaging**, which is where public policy is required to accompany changes in production and consumption. However, re-use measures on consumer packaging would largely apply to glass and in few cases to plastics, which are the only consumer packaging materials that can be re-used. Such measures would lead to distortion of competition on the packaging market.
- Some re-use markets for glass packaging do exist (e.g. local markets) and the industry supplies these markets with re-usable packaging products. However, **re-use targets do not take into account the market conditions for re-usable packaging**. Putting re-usable packaging on the consumer market requires a considerable upfront investment in logistics that not all economic operators are able to undertake.

FEVE Position on the Measurement Point: “Output of final sorting”

All material streams should have an **equal level of ambition** so that recycling rates are measured at the comparable point where recycled materials can substitute virgin raw materials in a production process - this means the net amount of recycled material after all losses. For glass, this would mean the **output of the final sorting operation**, where materials are **destined to enter a production process**. However, targets should be adjusted to fit a more ambitious measurement policy. In the case of glass, for instance, measuring at the output of the final sorting operation **and** setting a 90% recycling target, would effectively mean collecting more than 100% of all glass packaging put on the market. This would not be a realistic target.

FEVE Position on Recycling: “Promote quality & endless recycling”

Packaging and packaging waste legislation should remain neutral on comparing packaging types on the market-place, but should rather focus on setting rules and principles for all materials to fulfil. We therefore support all efforts to incentivise and promote quality recycling of packaging materials, for instance:

- Establishing mandatory separate collection across all EU Member States;
- Recognising the value of multiple recycling as an essential principle underpinning the circular economy, as endorsed also in the ITRE Committee Opinions on the Waste and Packaging & Packaging Waste Directives;
- Ensuring that when recycled into food contact materials, recycled materials do not pose any threats to public health and food safety. This was also endorsed by the ENVI Committee in a vote on the 12th of July on a Report on the Implementation of the Food Contact Materials regulation.
- We reject any claims that bio-based packaging should benefit from market incentives over other types of packaging.

ABOUT FEVE

FEVE is the Federation of European manufacturers of glass containers and machine-made glass tableware. Its members produce over 20 million tonnes of glass per year. The association has some 60 corporate members belonging to approximately 20 independent corporate groups. Manufacturing plants are located across 23 European States and include global blue chip and major companies working for the world’s biggest consumer brands. The European container glass industry provides a wide range of glass packaging products for food and beverages as well as flacons for perfumery, cosmetics and pharmacy to their European and world customers. With its 160 manufacturing plants distributed all over Europe, it is an important contributor to Europe’s real economy and provides employment to about 50,000 people, while creating a large number of job opportunities along the total supply chain. See more on www.feve.org