

## GLASS PACKAGING INDUSTRY'S POSITION ON THE NEW CIRCULAR ECONOMY ACTION PLAN

**The European Container Glass manufacturing is a genuine circular model, which perfectly fits with the EU's ambition to build a circular economy. FEVE - The European Container Glass Industry – therefore fully supports the new European Commission's Circular Economy Action Plan, which should be central to the EU COVID-19 Recovery Plan.**

- We operate a circular economy business model with 76% of all our products sold in the EU going back to our factories to make new food and beverage packaging, keeping valuable resources out of landfill.
- Glass is a permanent material that is infinitely recyclable in a closed bottle to bottle loop without losing its properties and, thanks to its inertness, is perfectly fit for food and beverage packaging no matter how many times it is recycled.
- We incorporate more recycled content than virgin materials in our packaging: on average 52% of our raw materials is recycled glass.
- Recycled glass is not waste, but a precious resource that the industry requires to replace virgin raw materials. Replacing virgin raw materials by recycled glass reduces energy consumption and CO2 emissions (for every 10% of cullet added to the batch, energy consumption goes down by 3% and CO2 by 5%).
- Glass also offers a reusable option for customers who are part of refund schemes. Refillable bottles can be reused up to 40 times and still be recycled at the end of their life.
- The Container Glass manufacturing industry also highly contributes to the EU economic and social welfare by maintaining 125.000 direct and indirect jobs operating in a circular economy business model and contributing to the trade value of the goods put on the market.
- The circular production of a food grade packaging solution with an endlessly recyclable, reusable and permanent material such as glass is inherently relevant to the UN 2030 Sustainable Consumption and Production Goal (SDG 12).
- Our new multi-stakeholder Partnership [Close The Glass Loop](#) brings together glass manufacturers, glass processors, food & beverage producers, extended producer responsibility schemes, and local and regional authorities to achieve a 90% average EU collection rate of used glass packaging by 2030 and improve the quality of recycled glass. It demonstrates the commitment of the glass packaging value chain to work together, co-develop solutions within industrial ecosystems and support the transition towards a circular economy, innovation, and sustainable economic growth.

**The European container glass industry welcomes the opportunity to participate in the Committee of the Regions' consultation on the new Circular Economy Action Plan. To close the loop and achieve a complete circular economy for packaging in Europe, we call on the Committee of the Regions to consider the following amendments in its opinion.**

### Infinite recycling and the role of permanent materials

Recognises the role of permanent materials, which can be infinitely recycled in a closed loop because they retain their properties no matter how many times they are recycled. Such materials can reduce dependence on the use of virgin materials for packaging.

### 2025-2030 Targets and investment in collection and sorting infrastructure

Urges the European Commission to continue supporting Member States that are at risk of not reaching EU recycling targets for 2025 and 2030. The circular economy for any packaging involves many stakeholders, from local and regional authorities to producers, to brands and consumers. It is important to get all these stakeholders working together to close the loop. Thus, important efforts under the previous European Commission, including the so-called 'Virtuous Circle' missions, should be pursued that bring all these actors together.

Supports the setting up of voluntary stakeholder platforms such as Close the Glass Loop to address systemic issues in the circular economy for each material by bringing together local and regional authorities, extended producer responsibility schemes, glass producers, glass recyclers and food and beverage sectors to collect more and better together.

Stresses that Member States having difficulties to meet the new ambitious EU recycling targets should be helped by targeted EU funding to install an innovative collection and sorting infrastructure and to invest in high quality recycling facilities. In the case of glass such investments have an immediate beneficial environmental and economic impact since this material is easy to recycle and has a positive scrap value.

### Separate collection

Welcome the emphasis on separate collection. The way packaging is collected directly impacts the quantity and quality of the collected materials that can be recycled. Separate collection and sorting are therefore the prerequisite to guaranteeing high-quality recycling processes of permanent materials.

Stresses the importance of supporting national and local authorities to improve existing separate collection schemes and install new ones in countries where glass recycling has potential for improvement.

Any initiative to harmonise collection systems across the EU must take account of regional and local circumstances and consider the different systems that have been established by Member States and have achieved very high recycling rates (e.g. bottle banks for glass). One size will not fit all and sharing of best practices on separate collection among Member States should be promoted at EU level to make collection simple for the consumer and optimal for the recycling value chain. Calls on the Commission and Member States to recognise as best practice the Bottle bank system for glass packaging which has achieved over 90% collection in several countries already.

While the closed loop bottle to bottle recycling in the food and beverage sector ensures that packaging materials used in the packaging sector go back into the same product packaging loop to provide the same standards of food preservation and consumer health, such systems should be managed so as not to put undue burden on the consumer, local governments and

increase environmental impacts (e.g. Deposit Return Systems for Single Use Packaging). Mass scale quality collection systems should be favoured over cherry picking of collection schemes.

Highlights the importance of Extended Responsibility Schemes to establish separate collection systems and to ensure quality partnerships for waste collection on national, regional, and local level.

Stresses the key role of consumers and therefore reiterates the need for better guidance on how to separate their waste and to put the different types of used packaging in the right place. Furthermore, reiterates the importance for Member States to continue initiatives to further promote waste sorting to avoid that any glass packaging ends up in residual waste.

### Eco-modulation of EPR fees

Supports the waste hierarchy and would welcome further recognition for permanent materials which, when collected, can be recycled infinitely without losing their intrinsic properties. The use of such materials in packaging is the best way to guarantee high-quality recycling and ensure that resources remain in use in the economy, thereby reducing the reliance on virgin raw materials. It will also ensure that all packaging is reusable or recycled by 2030. In this respect, a differentiated step within the recycling category of the waste hierarchy (e.g. one-off and downcycling versus high-quality multiple recycling<sup>1</sup>) could be considered in the context of eco-modulated EPR fees.

Eco-modulated EPR-fees should also reflect the ease with which a certain type of packaging can be recycled; it should reflect the likelihood of the packaging of being separately collected, sorted and actually recycled even after numerous recycling trips. This recyclability criteria should also consider the properties of the recycled material and its ability to replace the corresponding virgin material.

### Reuse

Supports the Commission's initiative to launch the analytical work to determine the scope of a legislative initiative on reuse to substitute single-use packaging in food services and to investigate design for re-use and recyclability of packaging for safe packaging applications which are easier to recycle and reduce complexity.

Asks for thorough consideration as to how this can be achieved in consultation with the specific material value chain including producers, recyclers, brands, local authorities, and consumers as extensive logistics systems along the value chain are needed to support reuse.

### Recycled content

Highlights that introducing requirements on recycled content has been conceived as a market driver for materials which today are not effectively recycled due to technical and market limitations directly linked to their inherent properties. This approach is not effective for fully recyclable materials such as glass for which the increase of the average recycled content is directly linked to the availability of more, better-quality recycled glass<sup>1</sup>. In Europe, market demand for quality recycled glass exceeds the supply.

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<sup>1</sup> More details: [Recycled content and glass packaging](#)

### Landfill and incineration

Stresses that the new Circular Economy Action Plan does not give enough attention to reduce the reliance on landfilling and incineration of recyclable resources from household waste by promoting more sustainable separate collection systems for recyclable materials and products.

Urges the European Commission therefore, to eliminate current loopholes in the waste management process for recyclables and supports a more ambitious approach to keep these valuable materials in the recycling loop.

### Green claims and environmental footprinting

Welcomes action against green washing on product environmental labelling and calls on the European Commission to examine the methodologies used in Life Cycle Assessment (LCA) and the Product Environmental Footprinting (PEF) which have large gaps<sup>2</sup>.

Since neither PEF nor LCA take account of the impacts of plastic marine littering, how long nor how well a product can perform (e.g. shelf life) nor the circularity of a product (its ability to be infinitely recycled without loss of properties as is the case with permanent materials), calls on the Commission to set up a working party to help plug the gaps in LCA and PEF.

### Food waste and shelf-life

Welcomes the focus on reducing food waste which goes hand in hand with packaging that can extend shelf-life. Glass can play an important role in this fight against food waste.

### Toxic-free environment

Welcomes the European Commission's focus on enhancing circularity in a toxic-free environment and on the interface between chemicals, packaging, and waste legislation and stresses that when recycled into food contact materials, recycled materials do not pose any threats to public health and food safety.

Stresses that permanent materials such as glass do not lose their safety properties no matter how many times they are recycled, hence contributing to a toxic-free environment.

Recognises that food packaging plays a key role in the sustainability of food systems and welcomes the upcoming revision of the Food Contact Materials (FCM) legislation including the link between using environmentally friendly, reusable and recyclable materials in food contact applications and legislation to improve food safety and public health. Calls upon the European Commission to adopt EU harmonised rules for glass as food contact material.

Recognises the importance of the inertness of a packaging (e.g. glass) which makes it fit for food and beverage packaging no matter how many times it is recycled.

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<sup>2</sup> [GAP ANALYSIS for the Life Cycle Assessment of Container Packaging](#)

## Recycled in the EU

Strongly supports the Commission's ambition to make "recycled in the EU" a benchmark for qualitative secondary materials and the related review of EU rules on waste shipment, with the ambition of allowing waste exports only if they make sense from a sustainability perspective. This will stimulate growth in recycling activity in the EU, increase employment and decrease the EU dependency on third countries for raw materials.

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## END NOTES

### About FEVE

FEVE is the Federation of European manufacturers of glass containers for food and beverage and flacons for perfumery, cosmetics and pharmacy markets. Its members produce over 80 billion glass containers per year. The association has some 60 corporate members belonging to approximately 20 independent corporate groups. Their 160 manufacturing plants are located across 23 European States and maintain 125.000 direct and indirect jobs along the total supply chain. See more at [www.feve.org](http://www.feve.org).

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