FEVE The European Container Glass Federation

GLASS PACKAGING INDUSTRY'S POSITION
EUROPEAN PARLIAMENT'S OWN-INITIATIVE REPORT ON THE NEW CIRCULAR ECONOMY ACTION PLAN
DRAFT REPORT, MEP JAN HUITEMA (RENEW)

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.

To close the loop and achieve a complete circular economy for packaging in Europe, we call on Members of the European Parliament' Environment Committee to consider the following points when voting on the Environment Committee's draft report on the new Circular Economy Action Plan:

- **Promoting infinite recycling and the role of permanent materials**
- **Enhancing circularity in a toxic-free environment**
- **Optimising separate collection for closed loop recycling for food and beverage packaging**

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1. Promoting infinite recycling and the role of permanent materials

Permanent materials (aluminium, glass and steel) have the potential to be recycled over and over again without losing their inherent properties. They contribute to maintaining circular material loops. A 'permanent material' is a material whose inherent properties do not change, regardless of the number of times it goes through a recycling process. It means that once it is produced for the first time, and properly collected and processed at its end of life, it becomes the raw material for new and endless production loops. Such materials are and will remain at the heart of any proven and well-functioning Circular Economy.

Aluminium, glass and steel sectors (APEAL, European Aluminium, FEVE, and Metal Packaging Europe) jointly recommend to:

- **Encourage permanent material loops**
- **Underline the essential role of packaging for preservation and safety (in particular for food)**
- **Promote separate and harmonised collection of waste to achieve high-quality recycling**

In addition to these joint recommendations, FEVE would like to emphasise additional very important concepts, described below.

2. Enhancing circularity in a toxic-free environment

Emphasis should be made on closed loop recycling for food contact materials to ensure all food and beverage packaging is reused and recycled into a new food and beverage packaging.

FEVE welcomes the European Commission's focus on enhancing circularity in a toxic-free environment and on the interface between chemicals, packaging, and waste legislation. To foster trust in market for secondary raw materials, and the uptake of recycled material into the production of materials for food contact, it is essential that, when recycled into food contact materials, **recycled materials do not pose any threats to public health and food safety**. 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.

As underlined in the Farm to Fork Strategy, packaging plays a key role in the sustainability of food systems and we welcome 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**. We call upon the European Commission to adopt EU harmonised rules for glass as food contact material.

3. Optimising separate collection for closed loop recycling for food and beverage packaging

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**.

For glass recycling, Extended Producer Responsibility schemes are proven to be the most effective approach (e.g. the bottle bank system for glass packaging has achieved over 90% collection in several countries already). They ensure that glass packaging materials go back into the same food and beverage packaging loop, while providing the same standards of food preservation and consumer health, and without putting undue burden on the consumer. EPR schemes should be maintained and improved.

To tackle the collection of plastic beverage containers, more and more countries are considering the introduction of a recycling Deposit-Return Scheme (DRS), whereby consumers pay a deposit at the point of purchase of a beverage container and the deposit can be redeemed when the empty container is returned. While aiming to tackle a plastic specific problem, glass is often considered at the same time for a recycling DRS. However, unlike plastic packaging, all food contact and non-food container glass can in principle be collected together in bottle banks and is always safe for closed loop recycling back into food and beverage packaging. Glass does not have the same recycling difficulties as other materials such as plastics and evidence demonstrates that **a DRS is not the right solution to maximise the quantity and quality of recycled glass. It could instead put collection and recycling for non-DRS glass at risk.**

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About Glass

- Glass is natural. Glass is simple and doesn't pollute the environment: it's made from raw materials found in nature.
- Glass is 100% and infinitely recyclable, and can be recycled again and again without any loss of quality.
- Glass preserves product quality. Glass is inert and acts as a safe barrier to external agents. It protects not just product quality but the health of the people who use it.
- Glass is caring. Glass protects the health of the environment and ourselves.

The European Container Glass manufacturing is a genuine circular model

- **76% of glass bottles are collected for recycling in the EU** – Most of them go back into a bottle to **bottle production system,** keeping valuable resources out of landfill.
- We incorporate more recycled content than virgin materials in our packaging: on average **52% of our raw materials is recycled glass**. Replacing virgin raw materials by recycled glass reduces energy consumption and CO2 emissions (for every 10% of recycled content added to the batch, energy consumption goes down by 3% and CO2 by 5%).
- **Refillable bottles** can be reused up to 50 times and still be recycled at the end of their life.

- 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 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.

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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**.

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