

Brussels, 3 June 2021

Boosting closed loop glass recycling in Europe: Why Deposit Return Schemes are not the way forward

To whom it may concern,

More than 125,000 people work in the glass packaging value chain across Europe. FEVE represents the European container glass industry, which is strategic to the European economy because it services the essential European food, beverage and pharmaceutical sectors as well as cosmetics and perfumery. The industry serves these sectors in domestic markets and is an enabler for the export of products across the world, which in turn delivers wealth to our economies through trade.

We are proud to produce healthy, reusable and infinitely recyclable closed loop packaging. Glass is a permanent material, meaning it can be endlessly recycled without loss of its intrinsic properties. It is inert and always remains healthy and safe for food grade packaging no matter how many times it is recycled. Unlike many other waste streams, there is a high demand for recycled glass and the average collection rate across Europe is currently 76%, with most of the bottles recycled being reprocessed back into bottles. There is potential and ambition to do more and – as part of the multi-stakeholder partnership [Close the Glass Loop](#) – we aim to boost the European collection for recycling rate to 90% by 2030 and improve the quality of recycled glass, so that more recycled content can be used in a new production loop.

When applied to plastic containers, a Deposit Return Scheme (DRS) scheme can help reduce littering, boost collection rates and optimise plastic recycling processes for food contact applications. With this letter, we support the response submitted by British Glass on the public consultation on “Introducing a Deposit Return Scheme in England, Wales and Northern Ireland”. Evidence across Europe shows that DRS does not maximise quantity or quality of recycled glass and we consider that including glass in a DRS could have a range of negative consequences and put existing collection and recycling systems at risk.

- **Extended Producer Responsibility (EPR) schemes already ensure that all types of glass containers are effectively collected and recycled at the end of their life.** The top 3 European countries (Belgium, Slovenia and Sweden) in terms of glass recycling, operate an EPR only scheme. Of the 10 countries with a glass recycling rate above 80% only 3 operate a combined DRS/EPR system (Denmark, Germany and Finland). Contrary to DRS systems, which are typically only used for beverage containers (beer, water, soft drinks), EPR schemes already ensure that all glass packaging types – and not simply a small portion – are collected and recycled effectively via kerbside and bottle bank collection. DRS cannot be considered a mainstream solution for tackling waste glass as the 6 DRS (Croatia, Denmark, Estonia, Finland, Germany, and Lithuania) in operation across Europe only accounts for 436,000 tonnes of the 14 million tonnes of waste glass generated, i.e. it only accounts for 3.1% of the waste glass generated across Europe. Only in Croatia and Finland is the DRS the major collection mechanism, while in the other 4 countries less than 20% of glass is collected via the DRS.
- **Diverting glass packaging away from EPR schemes through a recycling DRS puts at risk the viability of continued kerbside and bottle bank collections of glass and undoes decades of investment in infrastructure & education.** The implementation of a recycling DRS could impact on the efficient collection by the local authorities of out-of-scope packaging. The DRS removes high value, high quality glass from the EPR system which can have a major impact on the viability of the EPR system. For example, DRS are in operation in Croatia, Estonia and Lithuania and



although the recycling rates for the in-scope glass are high the overall national recycling rates are below the EU-27 average and placing all three countries within the eight lowest recycling nations in Europe. In the case of Lithuania, the recycling rate for glass since the implementation of the recycling DRS in 2016 has been below the 2015 rate of 74.3%.

- **The cost of operating a DRS scheme is substantially higher than that of EPR schemes – especially for glass.** Evidence from existing DRS shows that the handling and management of glass is far harder than PET or cans and this is reflected in the material level producer fees. The inclusion of glass in a recycling DRS results at best in marginal gains but at a very high cost. The cost of operating the DRS varies considerably from €124 per tonne in Estonia to €333 per tonne in Finland, with an average cost across the four countries of €213 per tonne. The operating costs associated with the Extended Producer Responsibility (EPR) scheme can be seen to be far more consistent across the four countries. These vary from €77 per tonne in Germany to €112 per tonne in Finland, with an average cost of €94 per tonne.
- **Running two glass collection systems in parallel can lead to confusion among consumers – meaning less effective recycling.** The majority of the countries that operate a recycling DRS had or still have a well-established refillable DRS and consumers have been accustomed to the two-system approach, and hence, the transition to the recycling DRS was easy. However, in many of the Member States the refillable markets have disappeared and consumers are used to just the one system of recycling. Therefore, running two glass collection systems in parallel is more confusing for citizens, and risks less glass being recycled as a result of a dual system. Additionally, it is burdensome for consumers to identify DRS waste packaging, for which they can claim a deposit, from non-DRS waste packaging.
- **The inclusion of glass in the recycling DRS risks shifting the packaging market away from glass and into PET (or metal cans).** The unintended market distorting effects of DRS for glass are clearly visible within market data. The impact of DRS on the market share of glass for in scope products is very stark, with those countries operating a dual EPR/DRS system having a glass market share 65–78% lower than those without an existing DRS.

Our aim is to have people recycling more and better and we do not believe a DRS is the right recycling system for glass. We consider that the highest recycling rates for glass can be achieved when there is a separate single glass collection system, consistent kerbside and bottle bank collections, and effective public communication initiatives, under a system of Extended Producer Responsibility. We therefore support improved Extended Producer Responsibility schemes and municipal waste management systems that make collection simple for the consumer and optimal for the recycling value chain.

Yours sincerely,

Adeline Farrelly
Secretary General
FEVE (the European Container Glass Federation)

About FEVE

FEVE is the association of European manufacturers of glass containers. The glass packaging industry generates 125 000 direct and indirect jobs thanks to 160 Container glass production sites in Europe producing a wide range of glass packaging products for food and beverages, perfumery, cosmetics and pharmacy for European and global customers. FEVE members have plants in 23 European countries. Container glass is one of Europe's best recycled products. See more on www.feve.org.