

Stressing its commitment to climate-neutral circularity while disputing claims that glass is incompatible with current EU climate objectives, the container glass industry recently opposed a 'free pass' recommendation by the PPWR for glass. In alignment with the EU's green vision, FEVE is advocating for comprehensive sustainability and material-specific waste targets as it addresses concerns over increased plastic use.

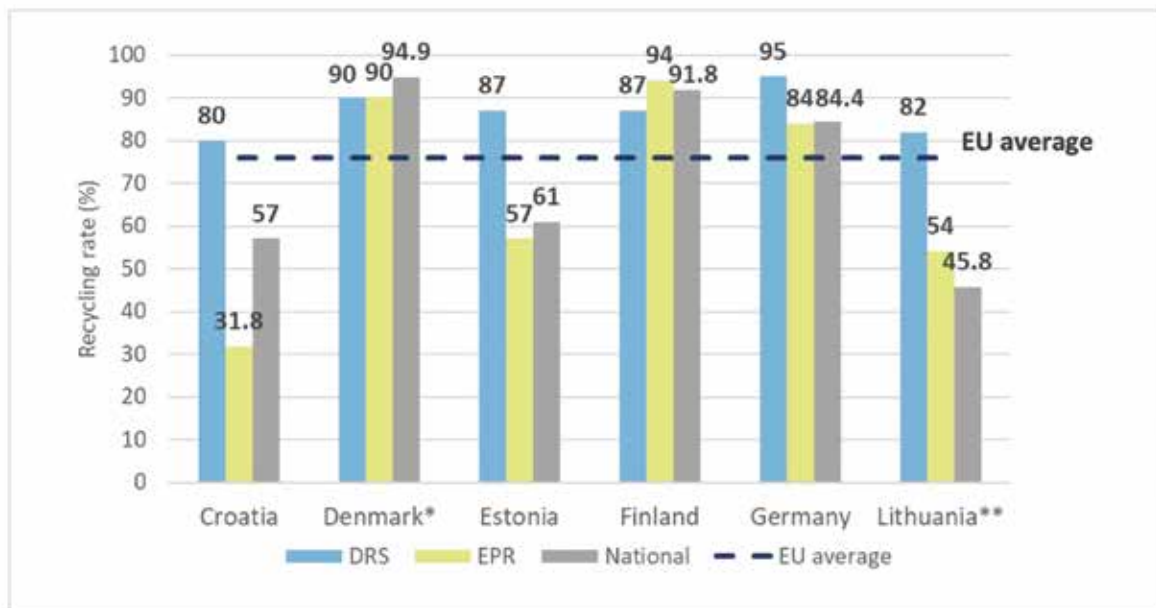
# FEVE challenges PPWR glass free pass claim by Zero Waste Europe

**A**s deliberations surrounding the Packaging and Packaging Waste Regulation (PPWR) continue to evolve, the container glass industry finds itself at the intersection between policy recommendations laid out in Zero Waste Europe

RELOOP's document titled 'Reinventing Glass'. While there is alignment on several fronts, FEVE has categorically disputed a crucial assertion that suggests glass should be accorded a 'free pass' under the current PPWR plans.



Comparison of the glass recycling rates (%) for DRS and EPR in countries operating a dual system in 2017



\*The 90% figure for EPR in Denmark is a minimum estimate based on the national glass recycling rate of 94%.

\*\*The 45.8% national recycling rate in Lithuania reported by Eurostat appears low since it is below the recycling rate for both the DRS (82%) and EPR (54%).

## GLASS ALREADY UNDERGOING CLIMATE-NEUTRAL REVOLUTION

As a genuine circular model for packaging the European con-

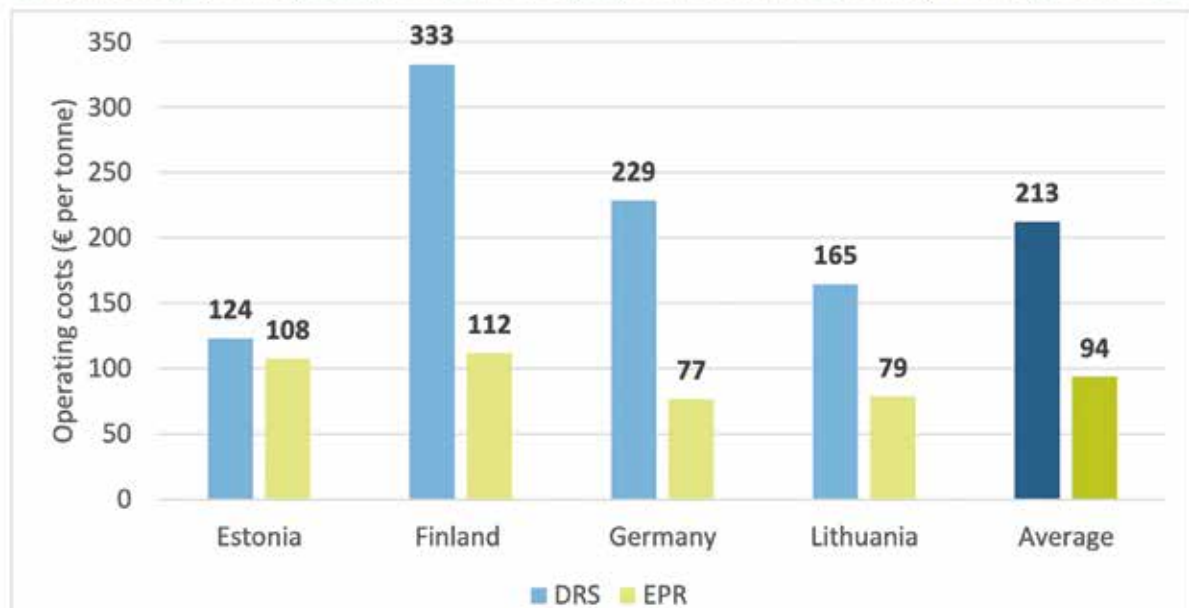


tainer glass manufacturing perfectly fits current EU ambitions to build a circular economy. By 2050, the container glass industry is also committed to achieving a major revolution in making glass that is fit for this circular and climate-neutral economy. This goes beyond individual business commitments and roadmaps to reflect a sustainable business transformation with the full weight of the glass industry behind it. That's because under the EU Climate Law decarbonisation is not an option but an obligation. For this reason, FEVE holds that the ZWE/RELOOP claim about the 'incompatibility of single-use glass with the climate agenda' is not only untrue but also incoherent with EU law. The claim is based on a ZWE study commissioned from Eunomia on 'Decarbonisation of Single Use Beverage Packaging' - a study

predicated on the assumption that decarbonisation is a choice for industry rather than something mandatory to maintaining the right to operate as an industry in the EU. It is also based on partial, unchecked and inaccurate assumptions - all of which FEVE will be addressing in a separate technical analysis.

FEVE holds that it is extremely short-sighted for an NGO such as Zero Waste Europe to completely ignore plastic pollution but continue to play the plastics game by only maintaining a narrow focus on CO<sub>2</sub> emissions and weight as indicators of sustainability. Their incomplete study and recommendations do not take into account all other key indicators such as closed loop recycling, food quality preservation and migration of substances from food to contact materials that are crucial components of sustainable packaging.

Comparison of operating costs for DRS and EPR for glass in countries operating a dual system in 2017



Please note: Denmark and Croatia are not included due to no data being publicly available.

As ZWE even states in one of its own recent reports titled ‘How FCM safety is fundamental to sustainability’: “Safety and sustainability concepts are directly interlinked: in order for food packaging to be truly sustainable, it needs to be safe for both human and environmental health.”

Offering safe, sustainable and circular packaging is at the heart of what the container glass sector does. For this reason, FEVE has welcomed the European Commission’s ambition to further promote the circularity of all packaging in the PPWR proposal. It supports PPWR measures that will effectively contribute to the following objectives:

- Fair effort sharing on packaging prevention by all packaging materials, with material-specific targets;
- 90 percent collection for recycling rate, with emphasis on high-quality and closed-loop recycling for higher uptake of recycled content in glass packaging;

- All packaging placed on the EU market to be recyclable in practice and at scale by 2030;
- Reusable packaging must be a complementary option to one-way packaging.

## AVOIDING INCENTIVES TO CHOOSE PLASTIC

FEVE expresses full agreement with Reloop and Zero Waste Europe that “it is crucial to avoid material substitution” and that material-specific waste prevention targets should be set to ensure fair effort sharing by all packaging materials. As for FEVE, it expresses total commitment to improving the sustainability of its products while further reducing the weight of packaging. It has in fact relentlessly shared its concerns that introducing packaging waste reduction targets that are not material-specific would cause severe market distortions, providing incentives to businesses to shift from heavier but circular materials (like glass), to lighter but difficult to recycle or reuse packaging materials. Instead of

reducing environmental impact as intended, this move could even result in increased adverse environmental consequences, due to an increase in plastic pollution.

According to FEVE, the PPWR Impact Assessment shows that the proposed overall reduction targets are not material-neutral, as they will not ensure that all packaging materials contribute individually, equally and fairly to waste reduction. Instead, they would result in a major increase in plastics and significant decreases of all other packaging materials (including glass). This can be seen in the European Commission’s own impact assessment, notes FEVE, with a projected four percent reduction in packaging waste generation in 2030 compared to the 2018 baseline leading to a 17.41 percent increase in plastic packaging waste. Here FEVE asks whether creating more plastic waste was really what the PPWR revision had set out to achieve.





## RECYCLED PACKAGING BOOSTED BY 90 PERCENT COLLECTION TARGETS

Unlike recycled content targets, optimized collection, sorting and recycling technologies will improve both the quality and quantity of recycled glass, and ultimately ensure higher recycled content. This commitment to high-quality closed loop recycling is shared by glass producers across Europe.

Post-consumer recycled glass is the most important raw material used to produce new glass

packaging: today, the average glass container made in Europe contains 52 percent recycled content. Introducing recycled content targets under PPWR is a way to stimulate demand for materials that are not effectively recycled - particularly plastics, due to technical and market limitations directly linked to their inherent properties. However, for other fully recyclable Permanent Materials such as glass and metals, there are no limits to increasing average recycled content other than availability. Furthermore, unlike many other waste streams there

is a high demand for recycled glass, where demand typically exceeds supply.

That's why the container glass industry shares an ambitious commitment to drive more higher-quality recycling across the EU. Glass packaging is already widely recycled in Europe, where the latest average EU collection for recycling rate is 80.1 percent (2021) and the vast majority is reprocessed back into bottles and jars (91 percent of recycled glass waste is recycled in a closed loop packaging manufacturing process, according to one 2023 study).

*Market share of glass across product categories in European countries with and without a dual system*

Product categories in scope	Product category	Market share of glass (%)	
		Non-DRS	Dual system
Typically included in a DRS	Beer	44.14	9.86
	Soft drinks	7.57	1.82
	Water	3.02	1.03
Typically excluded from a DRS	Cosmetic and toiletries	5.72	5.88
	Food	4.78	4.84
	Hot drinks	5.58	5.94
	Household care	0.51	0.40
	Spirits	95.87	96.33
	Wine	87.32	96.00

*Source: Produced by Oakdene Hollins using GlobalData*



Here FEVE believes more can be done. In 2020, it launched Close the Glass Loop to bring together glass manufacturers, recyclers, food & beverage producers, EPR schemes, and local and regional authorities to improve the quality of recycled glass, and achieve a 90 percent average EU collection rate of used glass packaging by 2030.

Through the PPWR revision, it also calls for the introduction of a mandatory 90 percent collection to meet the recycling target for 2030 for glass. Separate collection and sorting are a prerequisite to guarantee high-quality recycling processes and to meet proposed recyclability criteria.

Conversely, says FEVE, including a selective range of one-way glass packaging products in Deposit Return Schemes (DRS) is not the right solution to achieve 90 percent overall collection for recycling for all types of glass packaging. Instead, an insistence on imposing DRS could put glass collection and recycling at risk. Furthermore,

there is no evidence to support ZWE/ReLoop's claim that implementing a DRS for one-way glass containers results in 'a shift to more reuse'. Over the years, there has been a general reduction in the sales of reusable packaging across Europe across all three relevant product categories (beer & cider, soft drinks and bottled water) irrespective of whether the country operates a DRS for one-way containers. To this end, FEVE supports improving existing Extended Producer Responsibility (EPR) and municipal waste management systems for one-way packaging to make collection simple for the consumer, and optimal for the recycling value chain.

### RECYCLABILITY OF ALL EU MARKET PACKAGING BY 2030

Says FEVE: welcome the European Commission's ambition to require that all packaging placed on the EU market must be recyclable, based on harmonized criteria for 'recyclable packaging' to ensure

that all packaging is sufficiently and effectively collected, sorted and recycled - in practice and at scale. We support new 'Design for recycling' criteria and A-E recyclability performance grades, as a basis for the eco-modulation of EPR fees. Yet we believe there are several missed opportunities to transition to a fully circular economy for packaging, and actively call on EU decision-makers to raise the ambition of the PPWR:

- All packaging should be recyclable already as of 2030;
- The qualities of secondary raw materials should be differentiated, with a strong definition of high-quality recycling;
- The quantitative description of the recyclability performance grades should be complemented by a qualitative description, with grade A rewarding packaging that can be recycled multiple times and feed a closed material loop scheme.

These requirements will apply to all packaging materials and will enhance the recycling of glass packaging as well.

## RETURNABLE GLASS NOT THE ONLY CURRENT MARKET REALITY

Reusable glass has been a reality in Europe for decades, if not centuries. Glass dominates the refillable beverage containers market, where it accounts for 22 percent of packaging placed on the market in the key segments of beer, soft drinks and water (representing 96 percent of refillable beverage containers in 2017).

Reusable packaging can be an efficient solution for products in a short supply chain, and an important waste prevention measure. Yet it is not always suitable – or the optimal solution – for all product categories when transport distances, use and consumption patterns are considered. Any move towards reuse must be implemented in an economically viable and environmentally sustainable way that would bring tangible benefits, compared to recyclable one-way packaging.

## CONTINUATION OF GLASS PRODUCTION DECARBONISATION – AT A PACE

By 2050, the industry will be making climate-neutral glass in a circular economy, Says FEVE: This is non-negotiable. Brands

and retailers alike have committed to ambitious sustainability goals, and as a leading packaging material, the industry knows it plays a big part in this transition. There is no single European roadmap for decarbonisation, but many national and individual company strategies and commitments exist under a common 'Furnaces for the Future' vision. Industry is already exploring, testing and implementing many disruptive paths to decarbonise the production process, resulting in glass that is already 70 percent less energy-intensive and emits 50 percent less CO<sup>2</sup> than fifty years ago. This progress will continue, and European glass companies will continue to invest to manufacture glass products fit for a resource-efficient, low-carbon society.

To get there, shared efforts will be needed to support systemic change. Reducing carbon emissions is the biggest challenge of our time. It requires a clear, stable political and legislative framework, along with support and collaboration with the industry to explore innovative solutions that require security of renewable energy supplies at competitive costs.

Once this energy transition

challenge is complete, glass –whether recyclable or refillable– will be in a league of its own: a packaging material that meets the needs of brands, businesses and retailers, while being better for people and the planet.

Better for business, because it offers a circular packaging material that meets the demands of everyday consumption in a sustainable way. Better for people because it remains inert no matter how many times it is recycled, making it safest for consumer health and best to preserve quality and taste of products. And better for the planet, because glass is not made of oil, but materials sustainably sourced from nature –such as sand, soda ash, limestone and recycled glass– and can be endlessly recycled, without loss of its intrinsic properties. ■



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