



FERVER
European Federation of Glass Recyclers
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Position Paper on Circular Economy

Introduction

FERVER is the European Federation of Glass Recyclers. Our federation currently consists of 34 members spread across the Member States. They recycle around 70% of the glass collected in Europe (more than 10 million tonnes).

FERVER has played an active role in the development of the criteria defined by the European Regulation on End-of-Waste glass 1179/2012.

The European glass recyclers welcome the publication of the New Circular Economy Package within the timeframe set by the Commission.

Glass is 100% recyclable. It is one of the best examples of circular economy, as more than 70% of glass packaging is presently being recycled in a bottle to bottle closed loop. The new targets set by the Commission are high – 75% by 2025 and 85% by 2030 for glass –but the glass recycling sector is ready to take on the challenge.

FERVER hereby wants to share its views on the following issues in which glass is involved:

1. Definitions
2. Targets
3. Consistency in the specific directives

1. Definitions

Municipal waste: some countries are asking for the removal of the term ‘quantity’ from the definition of municipal waste. FERVER asks to keep it.

Final recycling process: it is difficult to identify the installations in accordance with this definition, certainly if located out of Europe. Moreover, it is not conform to the definition of recycling in force: any recovery operation by which waste materials are reprocessed into products, materials or substances. In other words, it is not necessary to enter a production process.

FERVER also wants to stress the importance of considering the production of End of Waste as an alternative, but valid final recycling process.



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Backfilling: FERVER wants to have the confirmation that, in accordance with the proposed definition, aggregates and constructions, including road constructions, are included in the definition.

2. Targets

70% of Construction and Demolition waste: the calculation of this recycling target includes the use as backfilling. Such approach is logical for materials like stones, bricks and concrete, but not for other materials like plastic and glass. FERVER welcomes the inclusion of a new sub-paragraph in art. 11 §1 asking 'Member States to take measures to promote sorting systems for construction and demolition waste and for at least the following: wood, aggregates, metal, glass and plaster'. FERVER regrets the absence of plastic in this list. A selective sorting system (e.g. a selective dismantling) of PVC windows, combined with the exclusion of the quantities of glass (and plastic) used for backfilling in the calculation of the recycling target, will undoubtedly boost the real recycling of huge quantities of glass (European estimation of 1,5 million tons/year) from construction & demolition waste.

Calculation method: the alternative method accepts up to 10% not recycled impurities. The impurities content in the output of FERVER members, the so-called furnace ready cullet (FRC), is always below 10%. It means that the collected quantity will always be equal to the recycled quantity, what is not true. This calculation method is not favouring the high recycling processes managed by the FERVER members. It does promote the collected quantities more than the quality of the collected glass waste.

Specific targets for glass recycling: some countries are advocating for taking into consideration the re-use of packaging (deposit system) in the calculation of the recycling targets. FERVER is in favour of a fair and neutral calculation system, in which both re-use and recycling are equally taken into consideration. The proposal of the European Commission does not clarify how to guarantee such correct calculation.



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3. Consistency in the specific directives

Glass is present in several waste streams. The present legal package gives rise to illogical differences in approaches, as follows:

- A glass packaging has to be really recycled in order to be considered in the calculation of the target defined by the amendments proposed for the packaging and packaging waste directive (PPWD)
- A glass window of a building can be recycled or integrated in granulates used for backfilling to be considered for the calculation of the global 'recycling' target defined by the amendment of the waste directive
- A glass window of a car can be 'recycled' or 'recovered' in order to fulfil the existing target of 95% recovery defined in the End of Life Vehicles directive (ELV's directive).

In order to improve the consistency of the European legislation, FERVER (1) proposes to exclude the glass fraction used in backfilling for the calculation of the recycling target of construction & demolition waste and (2) regrets that the Commission did not use the opportunity of this package to clarify the rules for the waste management of automotive glass in the ELV's directive. The present annex 1 of this directive only mentions:

'Treatment operations in order to promote recycling: ... - removal of glass'

This is all but a clear and mandatory approach as it is the case in the PPWD.

FERVER is available to provide additional information upon request, and to propose alternative texts to clarify the proposal of the European Commission.