

Glass Alliance Europe input to the Commission’s consultation on “New product priorities for Ecodesign for Sustainable Products (ESPR)”

Brussels, 11 May 2023

Glass Alliance Europe (GAE) welcomes the opportunity to provide feedback on the new product priorities for setting eco-design requirements.

The glass industry fully supports the aim of the EU Commission to make products on the EU market increasingly sustainable. We believe the performance and information requirements should be laid down on a product-by-product basis and taking into account rules already in place on circularity, energy and sustainability requirements.

The Commission proposal based on the JRC study identifies a number of intermediate products that could be considered for Ecodesign rules. Glass is listed as one of such intermediate products.

The glass industry comprises many different sub-sectors producing different applications (container glass, flat glass, glass fibres, special glass, tableware), where different raw materials and different production technologies are used. The glass industry is therefore granular and cannot be considered as producing glass as an ‘intermediate product’.

The glass industry comprises sub-sectors producing different applications (container-, flat-, special glass, glass fibres, tableware), using different raw materials and production technologies. Glass represents numerous intermediate and end-use products, where production processes & specific products are addressed by numerous legislations (e.g. ETS, IED, EED, PPWD, CPR).

For more details, please consider the inputs of FEVE, Glass for Europe & Glass Fibre Europe. The JRC report’s point on unsustainable and illegal sand mining is not relevant to the EU glass industry. The specific sand needed is mined in Europe under strict EU, national and local legislation. Sand extraction permits guarantee its sustainable sourcing and the rehabilitation of the quarries after the extraction period.

Thus, GAE wants to stress:

- **“Glass” cannot be considered an intermediate product and should not be listed as a priority under ESPR.**
- **Existing EU legislation should be considered before further ESPR regulation.**

For more detailed information on the different glass sub-sectors, please also consider the sector-specific inputs of FEVE (www.feve.org) , Glass for Europe (www.glassforeurope.com) and Glass Fibre Europe (www.glassfibreeurope.eu) .

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About Glass Alliance Europe

Glass Alliance Europe is the European Alliance of Glass Industries. It is composed of 19 national glass associations and of the main sectors of the glass industries: container glass, flat glass, special glass, domestic glass and continuous filament glass fibres. Over Europe, glass-makers employ around 200,000 people. Glass industries invest in research, develop and manufacture glass products fit for a sustainable, resource-efficient and low-carbon society such as energy-efficient windows, fully recyclable bottles and jars, weight-lightening continuous glass fibres, glass for photovoltaic modules, etc. Glass industries continuously invest in upgrading manufacturing installations to minimize the carbon content of products and increase their recycling.