



With the support of the following national Extended Producer Responsibility Schemes:



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Calling for an ambitious and comparable measurement point for glass recycling

FEVE, FERVER, EXPRA and EuRIC are committed to increasing the quality and efficiency of the glass recycling value chain through separate collection, quality recycling and closed loop manufacturing of glass. To help us achieve this, we support a single, harmonised, ambitious and enforceable calculation methodology for glass in all Member States.

In view of the calculation methodology to be used by Member States to report on their recycling rates for glass packaging, we propose the following measurement point and numerator:

Measurement point for glass recycling	= Input cullet treatment plant
Calculation methodology for the numerator of the glass recycling rate	= Weight of waste materials entering the cullet treatment plant – Weight of non-glass material losses (e.g. organics, residual waste) – Weight of non-targeted materials (e.g. recyclable metallic cans and closures)

❖ More ambitious than today

The final wording of the amended EU Waste Framework Directive sets the measurement point at the “*recycling operation whereby waste materials are actually reprocessed into products, materials or substances*” (Article 11a, 1 (c) of Directive 2008/98/EC amended by Directive EU 2018/851). The same wording is used in the EU Packaging and Packaging waste directive (art. 6a 1(b) of Directive 94/62/EC amended by Directive EU/2018/852).

All material streams should have **an equal level of ambition** when reporting recycling rates, regardless of the complexity of different recycling value chains. In the case of glass, FEVE, FERVER, EXPRA and EuRIC have a common understanding that the measurement point is at the **input to the cullet treatment plant**, as this is the “*recycling operation*” where waste is “*actually reprocessed into products*”.

However, not all waste materials entering the cullet treatment plant are recycled in the cullet treatment plant itself. This should be reflected in the measurement method, which should account for the weight of waste materials entering the cullet treatment plant, **deducting non-glass losses** (e.g. organics, residual waste...) **and non-targeted materials** (e.g. recyclable metallic cans and closures).

❖ More comparable than today

Likewise, all Member States should have an equal understanding of the recycling operation for each material. In the case of glass, waste is directly delivered to the recycler, who performs both the sorting and the recycling step. But in some cases, there may be a primary sorting step before waste materials are delivered to the recycler.

Regardless of the collection system in place, non-glass losses and non-targeted materials should be deducted from the glass recycling rate. However, in order to reach the ambitious targets for glass recycling set in the Packaging & Packaging Waste Directive (70% by 2025 and 75% by 2030), FEVE, FERVER, EXPRA and EuRIC urge all EU Member States to enforce high quality, mono-material, separate collection systems for glass, which is the precondition to limit losses at the input of the cullet treatment plant.

❖ Maintaining a clear legal framework

Commission Regulation 1179/2012 establishes End-of-Waste criteria for glass. It clearly designates what is considered to be waste materials and what is considered to be a non-waste. The Regulation introduces requirements on the waste used as input for the recovery operation and on the quality of the output material, with severe limit values (expressed in PPMs) on non-glass components.

FEVE, FERVER, EXPRA and EuRIC recommend maintaining a clear and consistent legal framework between the End-of-Waste Regulation, the EU Waste Framework Directive and the EU Packaging and Packaging Waste Directive, which supports an ambitious and comparable implementation of the reporting on glass recycling.