JOINT ANNUAL MEETING WITH THE EU COMMISSION

Brussels, 28 MAY 2015



AGENDA

- **1. Welcome and Introduction**
- 2. Glass is key enabler of sustainable growth

3. Issues

- 1) Climate Change and EU ETS Post 2020
- 2) Respirable Crystalline Silica
- 3) REACH
- 4) Food Contact Materials
- 4. Conclusion



Glass – key enabler of sustainable growth

Adeline Farrelly, Secretary General

28 May 2015

Glass Alliance Europe

May 2015

All around us, at every moment of our lives



How much has glass production grown in Europe since 1990?





Growth with Jobs!

500 plants **500.000** jobs **24** EU countries

Long-term financial Investments (e.g. €610 million / year only for container glass)



Production Growth forecast (economic upturn) 1-2% per year

Decarbonisation forecast

Unit per year (unless breakthrough technologies)





Local value chains Tens of thousands of SMEs throughout the EU processing EU-made flat glass

300 km from customer/supplier (e.g. recyclers) Supplies exporting luxury goods, cars, spirits, wines, perfumes and high tech industries (e.g €21.5 billion per year for glass packaging)



Made locally ...sold globally



The World of Glass

✓ An inert natural material mainly made of abundant natural resources and of recycled glass

✓ A circular economy thanks to a fully recyclable and highly recycled material

✓ A material appreciated for its health & comfort benefits, in preserving ingredients, letting natural light into buildings, etc.

✓ In many applications serves to save energy or generate renewable electricity (e.g. windmills, insulation)

✓ A sought-after aesthetics for designers and creators which contributes to brand reputation and Europe's culture

✓ A material found in most leading products exported by the EU: food, automotive, luxury, etc.













Innovation glass is an enabler

- Glass innovation is a key enabler to Europe's technological efforts in many sectors
- Bendable, potentially near unbreakable and strong as steel
- Unlimited design
- ✓ CO₂ saving high performance glazing can save 100 million tonnes of CO₂ per year



Thank you

Collaboration on ETS

Anti-dumping measures for glass fibres

 Cumulative Cost Assessment study on the glass industry

✓ Invitation to the High Level Group of Energy Intensive Industries



The industrial situation today

- A fall in demand from key sectors as a result from the economic crisis;
- Greater competition from producers outside the EU targeting the EU market;
- Need for an investment attractive environment for capital-intensive glass industry;
- A lot of efforts go into R&D both for improved production techniques and for future products.



Question

How does DG Grow see EU's industrialisation policy, growth and jobs agenda in support of our sectors?





 International Negotiations
 Carbon Leakage Provisions
 Cross-Sectoral Correction Factor
 Other Sectors
 Possible New Flexibility for some Member States



International Negotiations

> Is the European Commission considering to develop criteria/methodologies to assess the level of efforts effectively required on competitors from other regions of the world to effectively mitigate climate change? This is indeed important to ensure comparable efforts globally.



Carbon Leakage Provisions

> Can the European Commission shed some more light on how does it intend to assess which industries are at risk of carbon leakage post 2020 (methodology, criteria and thresholds), so as to comply with the 24 October 2014 European Council's recommendation setting the objective 'of providing appropriate levels of support for sectors at risk of losing international competitiveness'?



Cross-Sectoral Correction Factor

- > Glass Alliance Europe believes that all installations in Europe should receive a free allocation up to the benchmark level (possibly periodically revised) based on recent production data). This would allow the EU glass industry to be competitive and to grow, while keeping an incentive to reduce emissions.
- > What is the view of the EU Commission on this principle ?



Vother Sectors

What are the plans of the EU Commission regarding the inclusion of other sectors in the ETS (residential, ships, transport, ...)?



 Possible New Flexibility for some Member States

Can the European Commission clarify whether or not this option is seriously considered and has the impact of this additional flexibility mechanism on the amount and price of allowances available on the market been assessed?



2) RCS – Respirable Crystalline Silica

REFIT Initiative NEPSi Social Dialogue Voluntary Agreement Carcinogens and Mutagens Directive (CMD) Lack of Harmonised Standards to Measure RCS



2) RCS✓ REFIT Initiative

- Glass Alliance Europe would like to understand how the European Commission will align the conclusions of the REFIT initiative with the outcome of the impact assessment on the CMD?
- > Are there new elements and/or additional study needs for the completion of the impact assessment?
- Would the European Commission envisage to include specific measures for substances for which the SCOEL has acknowledged the existence of a threshold in a possibly revised CMD?



2) RCS

✓ NEPSi Social Dialogue Voluntary Agreement

- What are the views of the European Commission regarding the NEPSi social dialogue agreement (SDA) as an alternative to the inclusion of RCS in the CMD?
- How would the European Commission take account and consider NEPSi signatories in case of a future EU regulation on RCS?
- Does the Commission envisage a revision/ renegotiation of the NEPSI agreement?



2) RCS

Carcinogens and Mutagens Directive

- In case this regulatory route is followed, and considering that substitution is not possible in glass making, how would the European Commission take account and assess impacts of the variety of interpretations and enforcement levels across Member States when it comes to the application of the mandatory measures?
- > A concrete example is the obligation to implement 'closed systems', which are not defined in the Directive. Would the Commission envisage to provide such a definition?
- In addition, where a closed system would prove to be technically and/or economically impossible to implement, would industry be granted exemptions to put in place such closed systems?

2) RCS

Lack of harmonised standards to measure RCS

How would the Commission envisage to address the need for harmonised standards in order to ensure a proper implementation and comparability of results?



✓ Risk Management Option (RMO) versus Authorisation process ✓ Art. 3.15 "intermediate" ✓ Glass Classification



Risk Management Option (RMO) versus Authorisation process

- How can downstream users be directly engaged from the beginning?
- > Is the Commission going to develop a specific platform for consultation?



</r> Art. 3.15 "intermediate"

- > Is the Commission informed about the uncertainty raised on the definition of intermediate following ECHA Guidance?
- Could you confirm that the responsibility to demonstrate the intermediate case lies in the hands of industry?



√Glass Classification

- In the ECHA webpage there is a specific page on "information on Candidate List substances in articles" where it is possible to discover that different glass articles are reported as containing SVHC substances, which is definitively not correct.
- This is really misleading, especially for worldwide downstream users ! How can we solve the problem?



4) Food Contact Materials

- Glass and ceramics are different materials obtained by different processes, but also with similarities (ceramic "skin" is made of glass): we need a common study with specific applications.
- GAE is strongly involved in the current collaborative project led by JRC and the support of the Commission to this project is fundamental and should be maintained.
- GAE is proactive and has launched the study of a Good Manufacturing Practices guide (scope of harmonization).
- The FCM market is global and not limited to the EU (cf. new Chinese standard) but initiatives at international level as ISO TC 166 could be preferred.



THANK YOU FOR YOUR ATTENTION!



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