

# **JOINT ANNUAL MEETING WITH THE EU COMMISSION**

Brussels, 26 June 2013



# AGENDA

- 1. Situation of the EU Glass Industry in 2012**
- 2. EU-ETS and Climate Change**
- 3. Eco-Design for Furnaces**
- 4. REACH**
- 5. Respiratory Crystalline Silica**
- 6. IED Directive (010/75/EU) Baseline Report and Other Air Emissions Legislations**

# UPDATE ON THE GLASS INDUSTRY

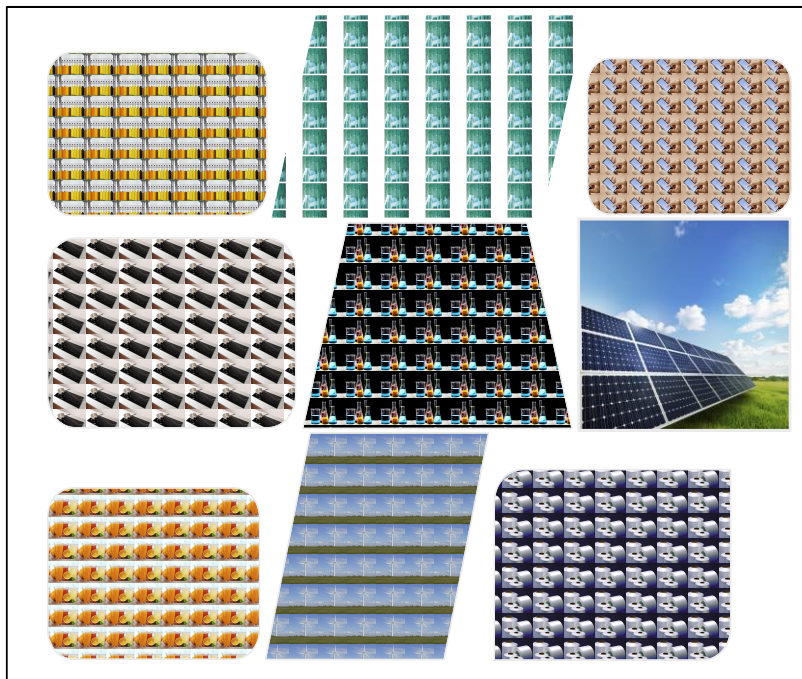


# The World of Glass

- ✓ An **inert material** mainly made of abundant natural resources and of recycled glass
- ✓ **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**
- ✓ A material that accommodates **many technological applications**
- ✓ A sought-after **aesthetics for designers** and creators which contributes to brand reputation and Europe's culture



# STATISTICAL REPORT 2012-2013



JUNE 2013

EUROPEAN GLASS INDUSTRIES

In order to provide a comprehensive and analytical overview of the situation in the glass industry, this report provides statistics for the whole glass industry together and statistics for each of the glass sectors. The situation varies a lot between the different sectors.

## Behind the global picture Very diverse situations in the glass sectors



GLASS FOR EUROPE  
Building, Automotive, Solar-Energy Glass



**esga**

European Special Glass Association

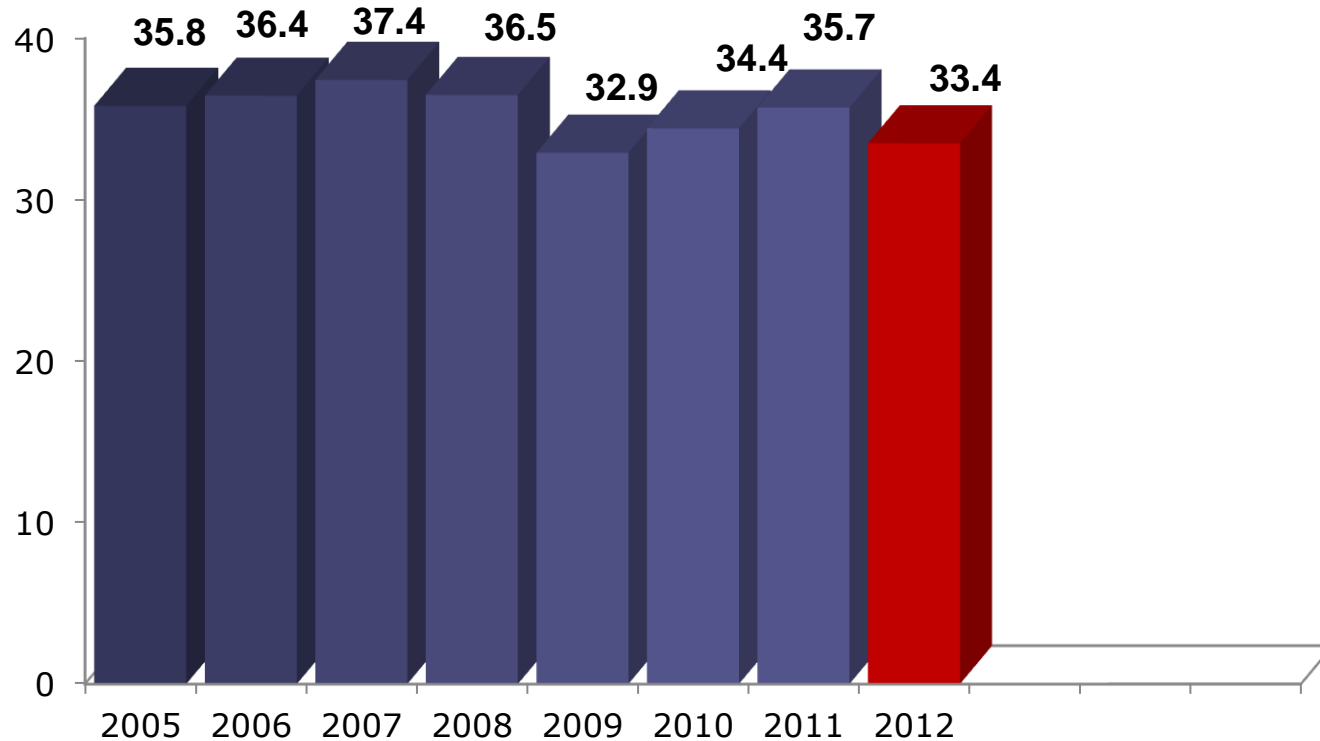
**GlassFibreEurope**

APFE - European Glass Fibre Producers Association (AISBL)



26.06.2013

# EU GLASS PRODUCTION



EU 27 – Million Tonnes

⇒ A 6.4% decrease in production 2012 vs. 2011

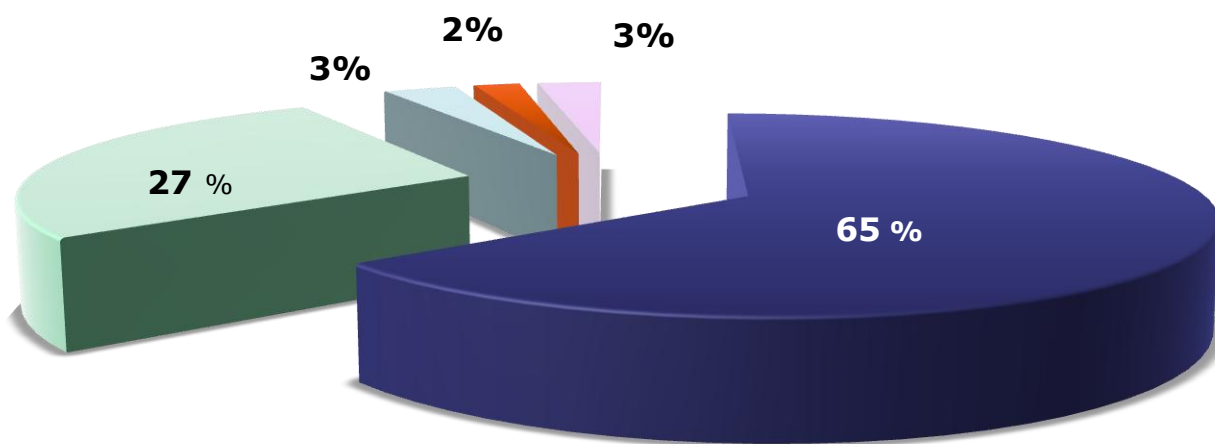
Source : GAE National Members' Estimates



# BREAKDOWN BY SECTORS

## PRODUCTION 2012

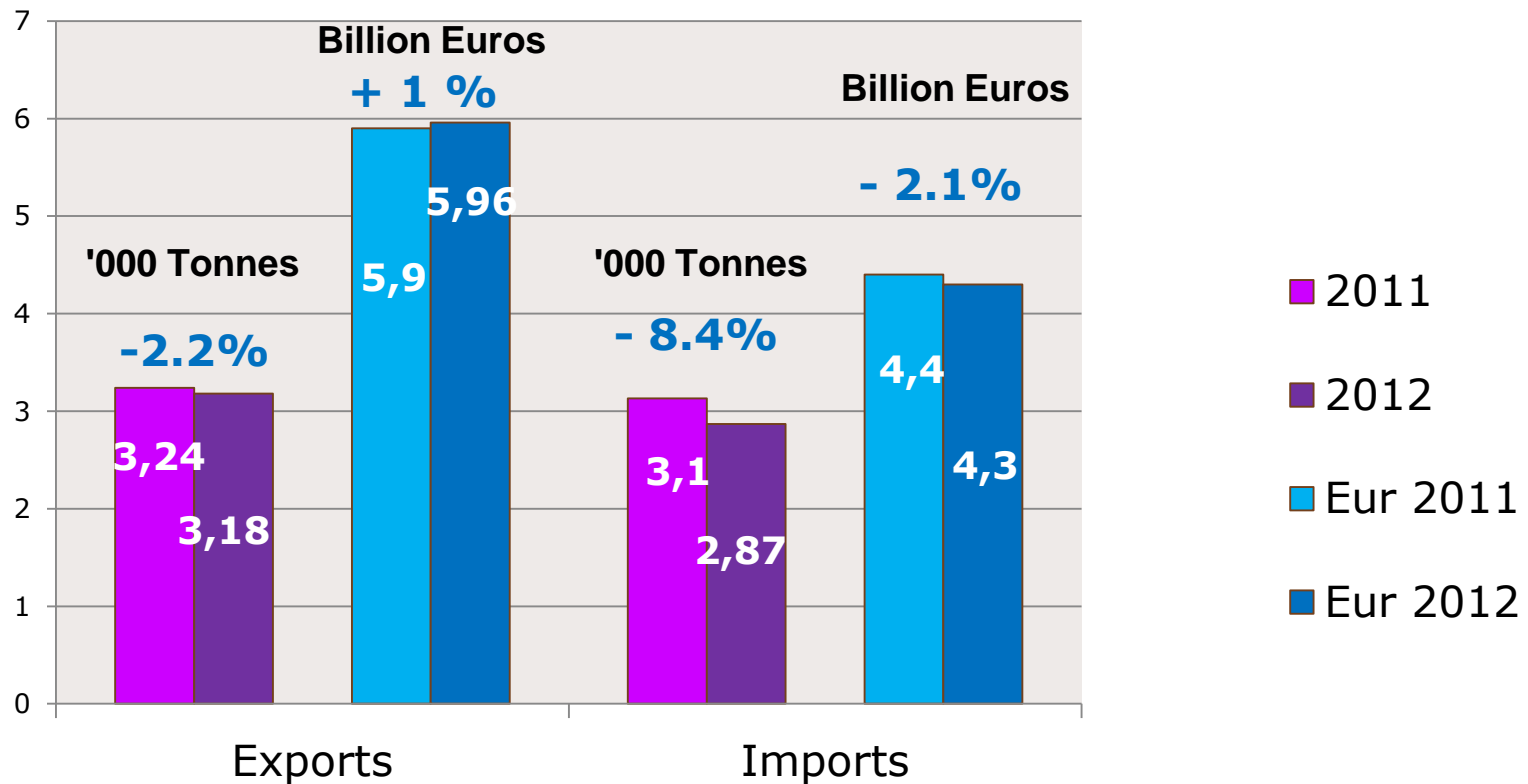
■ Container Glass ■ Flat Glass ■ Domestic Glass ■ Reinforcement Fibres ■ Other Glass



in million tonnes

Source : GAE Members

# EU Glass Industry 2012 : External Trade

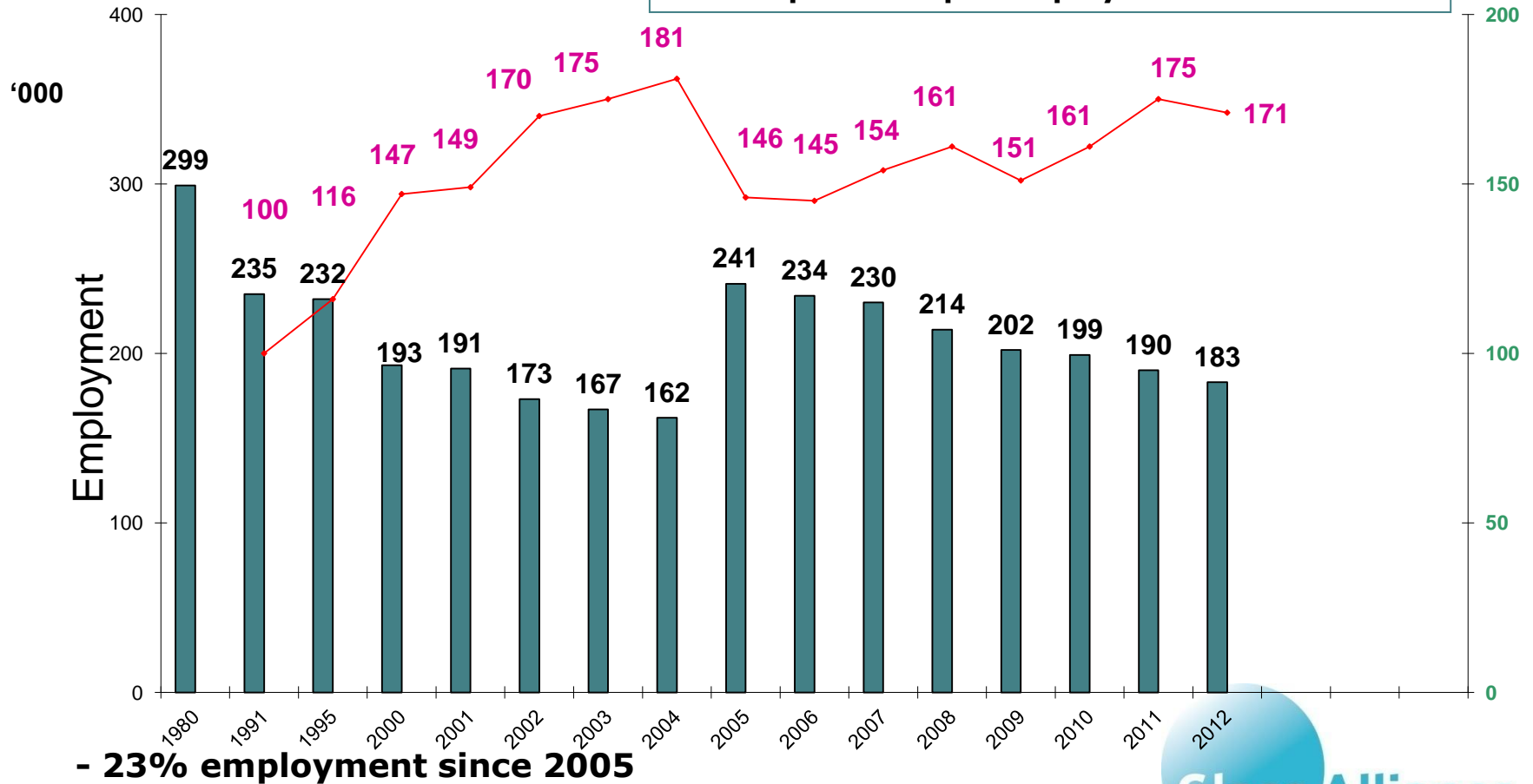


Source : Eurostat



# Employment and Production per employee in the EU Glass Industry up to 2012

Tonnes produced per employee : +17% vs. 2005



Source : GAE

EUR-27 since 2005



# OVERALL .....

- ✓ Industry suffers depressed EU market
- ✓ Investments continue along borders
- ✓ Unfair competition from outside EU
- ✓ Internal pressures to reduce costs
- ✓ More and more complex dossiers need high level of technical expertise and resources to cope
- ✓ But .....

Glass is still everywhere!

# Almost no other man-made material provides so many possibilities across so many industries and disciplines

- ✓ Preferred for food and beverages
- ✓ Important role in transportation
- ✓ Key element in architecture & buildings
- ✓ Part of renewable energy strategy
- ✓ Crucial in modern communications
- ✓ Unlimited design

**Please accompany us on our journey**



# THE ISSUES



# 1 – ETS & CLIMATE CHANGE

# 1- EU ETS and Carbon Leakage

## ✓ Carbon Leakage

- Has the Commission an opinion from their legal services for the CO2 price to be used in the revision of the list ?
- Is it possible, in case of problems with publicly available data, to use industry data ? Under which conditions ?
- When will the sectors be informed about the details for the qualitative assessment ? Will the recommendations of the Ecofys report be followed ?
- Ecofys study on past evidence of carbon leakage: what is the goal of this exercise ? Isn't better to look forward instead of backwards ? What about the compatibility between anti-trust rules and data requested in the questionnaire (profit margins, costs structure,...) ?

# 1- EU ETS and CLIMATE CHANGE

- ✓ **Carbon Leakage**
  - **After 2020, what is the Commission intending to do regarding carbon leakage ?**
  
- ✓ **Structural Measures and post-2030:**
  - **What are now the next steps after the public consultation regarding the 6 structural measures and the two stakeholders meeting ?**
  - **Is ex-post allocation on the agenda ?**
  
- ✓ **Does the Commission intend to work on comparing the different ETS systems around the world to see if they are really comparable?**



# 2 – ECO-DESIGN FURNACES



## 2 – ECO-DESIGN FURNACES

Glass Alliance Europe is aware of the intention of the European Commission to undertake an **impact assessment of diverse policy options for eco-design of furnaces**.

The policy options, as well as other scoping issues linked to large-scale furnaces, legislative feasibility/practicalities, alternative/innovative use of policy instruments are **outstanding issues currently under discussion**.

A **stakeholder “scoping meeting”** will take place ahead of the start of the impact assessment work.

- ▶ ***Which base cases will be covered by the impact assessment and which options will be assessed?***
- ▶ ***What would be the most valuable way for the glass industry to contribute to this work? In particular to the stakeholder meeting and to the impact assessment?***

## 2 – ECO-DESIGN FURNACES

The European Commission is also reflecting on **overlaps with currently evolving policy areas**, such as 'air policy', 'climate/energy package 2030' and 'reform of the EU ETS after 2020'.

- ▶ ***What could be the potential impact of this reflection on the ENTR Lot 4 work? timing? scoping? policy options? other?***

# 3 – REACH

## MAIN TOPICS

- ✓ *RMO Analysis for SVHC Substances*
- ✓ *Implementation of the REACH Regulation*
- ✓ *Authorisation Procedure*
- ✓ *REACH Revision*

# 3 – REACH

## RMO ANALYSIS for SVHC Substances

The **RMO analysis** set up by the Commission is obviously a good step forward to a better selection of the possible **SVHC substances** and the choice of the best option. However the number of substances under discussion is impacting the capacity to have clear background information. The substances under investigation are often used by SMEs for very new applications, which are not known by the Association, mainly for confidential reason or industrial competition. Moreover those SMEs are often not well informed about the RMO process and have no capacity to react to the consultation process.

➤ **Is the European Commission aware of this problem and how could the impact for SMEs be reduced ?**

# 3 – REACH

## Implementation of the REACH Regulation

- ✓ The implementation of the REACH Regulation seems to be unequal throughout Europe. This is mainly due to the different national interpretation of some specific topics like the intermediate status, authorization, restriction, etc. This could impact the internal industrial competition (state by state competition) and increase the misunderstanding on some specific topics.
- **Has the European Commission been informed about the problem and which solutions could she propose to reduce the potential impact on the industry?**

# 3 – REACH

## Authorisation Procedure

- ✓ **The authorization procedure would heavily impact the SME glass industry. Two main points have to be considered:**
  - the difficulty to face directly the cost for the authorization procedure (very expensive and repeated every 5 years) and the impossibility to transfer the cost to the downstream users, which could import the final article from outside Europe without any added cost.
  - the difficulty to find a possible substitution, mainly for technical and economical reason. The SME industry has no technical and economical capacity to activate high-tech research programs. Moreover the higher cost can't be transferred to downstream users, which can find the same article imported from outside Europe without any obligation.

# 3 – REACH

## Authorisation Procedure

- **Is the European Commission informed about this problem and how can be reduced the impact for SME industry?**

# 3 – REACH

## REACH REVISION

- ✓ The REACH Regulation is under revision and discussions are going on at EU level.
- Are there any news about art. 3(15) (exemption from authorization for intermediates), annex V (exemption from registration), natural raw materials or other topics that could influence the glass industry ?



# 4 – RESPIRABLE CRYSTALLINE SILICA

# 4 – RESPIRABLE CRYSTALLINE SILICA

- ✓ The Commission is analysing two possible regulatory routes to classify RCS either under the Carcinogens Directive or under the Chemical Agents at Work Directive. An impact assessment is being carried out by the Commission this year.
- How can the glass industry best contribute to the impact assessment ? Timing ?
- How to distinguish between certain categories of RCS generated by some processes ? (e.g. grinding)

**5 - I E D**

# 5 – IED & BASELINE REPORT

- ✓ **Baseline Report : this guidance to Member States is not yet published.**
- **How will it be possible to comply with the requirements of the new IED Directive if there is no guidance on the baseline report? This will be important for the revision of permits in 2014. How should we start a baseline report for the glass industry ?**
- **The industry suggests to use existing Member States legislation.**

# 5 – IED & SMALL COMBUSTION INSTALLATIONS (1-50 MW)

- **Are small glass furnaces (< 20 t/day) then considered as combustion installations ?**
- **Emission limit values for combustion installations would be detrimental to glass manufacturers.**

**THANK YOU FOR  
YOUR ATTENTION!**



89, avenue Louise  
B - 1050 Brussels

[www.glassallianceeurope.eu](http://www.glassallianceeurope.eu)  
[info@glassallianceeurope.eu](mailto:info@glassallianceeurope.eu)