

Brussels, 30 October 2025

To **EU Commission President**
Ursula von der Leyen

CC: **EVP Ribera, EVP Séjourné**

Dear President von der Leyen,

On behalf of **Glass Alliance Europe**, the collective voice of the EU glass industry, we urge the European Commission to ensure that **all glass sub-sectors are included among the beneficiaries of indirect cost compensation (ICC)** in the ongoing revision of the ETS State Aid Guidelines.

These sub-sectors are included under NACE 23.1 – Manufacture of glass and glass products. Certain mineral wool production activities fall under other codes within Division 23.99 (*).

The glass industry welcomes the call by several key Member States to **extend ICC to additional sectors such as glass, and to maintain ICC until 2030 and beyond**. This call echoes those already made by a broad coalition of energy-intensive industries and reflects a growing political understanding across Europe of the importance of preserving industrial competitiveness to enable decarbonisation.

The ongoing revision of the ETS State Aid Guidelines offers an opportunity to send a clear political signal of the EU's commitment to safeguarding the competitiveness of its own industry.

The glass industry is both **exposed to carbon leakage** and **actively pursuing deep decarbonisation**, particularly through the **electrification of melting processes**. Yet the absence of ICC for most glass sectors **undermines the business case for breakthrough investments** in electrified furnaces and other low-carbon technologies.

For instance, **hybrid furnaces** capable of operating with up to 50% electricity are being tested in the flat glass sector while electrification up to 80% is now being deployed in the container glass industry. In some segments of the mineral wool insulation fibres, the full electrification of furnaces is already a reality. Greater level of electrification is also tested and implemented across all glass segments and the whole glass industry is constantly increasing levels of electrification.

(*) NACE 23.1 Division 23 Manufacture of other non-metallic mineral products / Group Class 23.1 Manufacture of glass and glass products

23.11 Manufacture of flat glass

23.12 Shaping and processing of flat glass

23.13 Manufacture of hollow glass

23.14 Manufacture of glass fibres

23.19 Manufacture and processing of other glass, including technical glassware

+ 23.99.19.10 Slag wool, rock wool and similar mineral wools (excluding glass wool) and mixtures thereof, in bulk, sheets or rolls

All these technologies rely on **access to competitively priced electricity**. Since the current Guidelines were adopted, **carbon prices have risen far above initial assumptions**, further amplifying electricity costs and threatening the financial viability of decarbonisation projects.

Given that glass furnaces typically operate for 10–20 years, **the European industry is just two investment cycles away from the 2050 carbon neutrality objective**.

We acknowledge the introduction of the **electricity price relief mechanism** under the Clean Industrial State Aid Framework (CISAF). However, this measure offers only **short-term and limited relief** and is conditional on specific flexibility investments. Such measures, while welcome, **cannot offset the structural exposure of continuous industrial processes like glass production** to persistently high electricity prices.

Since the last review of the Guidelines, **market conditions have profoundly changed**. The surge in energy and carbon costs, now significantly higher than those faced by international competitors, is already leading to **capacity reductions and plant closures**.

The European glass industry is a **strategic and enabling sector**, essential to the **agro-food, circular economy, defence, construction, automotive, communication technologies/high tech uses of special glass and renewable energy** value chains. Ensuring the inclusion of all glass sub-sectors in the list of eligible sectors for ETS indirect cost compensation is therefore **crucial to maintain Europe's industrial base and deliver on shared climate and strategic autonomy objectives**.

We therefore count on your support **to ensure a swift conclusion of the ongoing revision and to extend ICC to all glass sub-sectors** in order to help secure our industry's future in a decarbonised, circular, and competitive European economy.

Kind regards,

A handwritten signature in blue ink, appearing to read "Bertrand CAZES".

Bertrand CAZES,
Secretary-General.

A handwritten signature in blue ink, appearing to read "Thomas DAVREUX".

Thomas DAVREUX,
President.



Carlo Pirrone, Secretary-General



Bertrand Cazes, Secretary-General



Luca Tosini, President



Arnaud Saint-Orens, President



Jan Te Bos, Director-General



Cédric Janssens, Secretary-General



About Glass Alliance Europe

Glass Alliance Europe is the European Alliance of Glass Industries. It is composed of 14 national glass associations and of the six sectors of the glass industries: container glass, flat glass, special glass, domestic glass, insulating glass and continuous filament glass fibres. Over Europe, the glass industry comprises more than 500 plants providing 500,000 direct and indirect jobs.

Europe is the world leader in glass making. Glass is a unique and inert material made from abundant natural resources and fully recyclable. It is a key contributor to the EU objectives of a low-carbon, energy-efficient and circular economy, and a key enabling material for essential supply chains, such as the pharmaceutical and health sector, the food and drink industry, buildings and construction, automotive, luxury goods and perfumes, electronics, etc.

Glass Alliance Europe

Av. Louise 89/9, B - 1050 Brussels

Tel. +32 0 470 428 778

info@glassallianceeurope.eu

www.glassallianceeurope.eu