

April 2026

JOINT POSITION ON THE DESIGN OF EU HARMONISED WASTE SORTING LABELS FOR GLASS PACKAGING UNDER THE PACKAGING & PACKAGING WASTE REGULATION

The undersigned, representing European and national level organisations that are part of the glass packaging collection & recycling value chain and partners of [Close the Glass Loop](#)¹, a European initiative aiming at achieving 90% glass packaging collection for recycling by 2030 in the EU, fully **support the objective of a harmonised labelling system across the EU to give coherent and effective sorting instructions to consumers**. A well-designed labelling framework can contribute to improving clarity for consumers, facilitating the free movement of packaged goods across the single market, and supporting circular economy objectives.

At the same time, it is essential that **the future system remains cost-effective, proportionate, evidence-based and compatible with existing high-performing collection systems**. Glass packaging is already collected and recycled at scale across Europe through well-established separate collection schemes, supported by decades of investment and consistent communication to consumers.

For glass packaging, the JRC's analysis confirms that harmonised labelling is expected to have limited impact on collection quantities and material quality. Glass already benefits from well-established sorting habits, high levels of consumer awareness and efficient separate collection systems. Indeed, behavioural testing indicates that the introduction of harmonised labels does not significantly affect capture or purity rates for glass. In this context, **any new requirements must remain proportionate and avoid introducing unnecessary complexity**.

This paper reflects our feedback on the JRC technical proposal as presented to the PPWR Expert Group on 18th March 2026 and highlight some key principles for harmonised waste sorting labels applied to glass packaging.

1. Glass pictogram

Pictogram design

The proposal introduces a pictogram for glass packaging based on a bottle. This constitutes a clear improvement in terms of consumer understanding, compared to the previous JRC proposal.

The glass packaging value chain had advocated for a pictogram reflecting the diversity of glass packaging formats, combining both a bottle and a jar. While this approach has not been retained for consistency across materials, the proposed pictogram is more intuitive and acceptable than the previous JRC proposal.

Pictograms should remain the core harmonised element of the system, ensuring recognition across the EU while avoiding unnecessary reliance on additional elements such as colour or text.

Pictogram variations

On pack

The proposal foresees that meta-labels cannot be used on packaging, meaning that each glass packaging

¹ With the exception of the Brewers of Europe.

item would carry a specific label based on the colour of the glass (coloured glass, uncoloured glass, green glass, brown glass). The introduction of multiple on-pack labels adds a level of complexity that should be carefully assessed against its added value. To keep the system simple and adapt to national collection practices, **granularity by colour is not needed on-pack** and the most important message the pictogram should confer to consumers is to confirm that the packaging is indeed glass.

In addition, the visual elements do not, on their own, allow consumers to distinguish between coloured glass, green glass and brown glass without accompanying text (which should be avoided to avoid fragmentation of the Single Market). This reinforces the importance of maintaining a simple and intuitive system, centred on clear visual recognition rather than excessive granularity. In this context, the system should allow for a simplified identification of glass packaging on-pack, avoiding unnecessary colour differentiation.

Waste receptacles

The pictograms should complement an established system of communication and consumer engagement for glass recycling, which has proven effective over several decades. **The system should therefore remain simple and adaptable to national collection practices, allowing for the use of pictogram variations that best reflect those systems.** For instance, while most EU countries collect all glass colours together, others require consumers to distinguish between two or three types of coloured glass². We therefore welcome the JRC proposal to allow the use of the most relevant pictogram variation (i.e. “glass”, “uncoloured glass”, “coloured glass”, “green glass” or “brown glass”), while ensuring a harmonised system.

2. Colours & text: distinguishing on-pack labelling and labelling on waste receptacles

On pack

The new EU-wide labelling system must be designed for products to be marketed across multiple countries and understood by all consumers in the EU. On-pack labels should therefore remain simple, harmonised and language-neutral to allow for products to move freely in the Single Market and reduce operational and financial burden. The inclusion of text will require manufacturers to translate the labels into the Member States language(s) where the packaged product is marketed and to fit them on the same pack, undermining the harmonisation goal of the PPWR. By way of example, certain beverages — such as wines and natural mineral waters — must be bottled at source. The inclusion of text on pictograms would therefore require brands exporting these products to incorporate multiple language versions on the same label, creating significant practical constraints and reducing label clarity.

Similarly, mandatory use of colours would create disproportionate technical, operational and cost implications.

The future implementing act should rely on a matching principle primarily based on the pictogram and clarify that the use of text-free and colour-free label options is always allowed on-pack and not subject to conditions or additional justification. *The choice of label format should remain with the manufacturer and should not require justification.* Unless it is explicitly clarified that economic operators may always opt for a text-free and colour-free on-pack label, this could lead to confusion, resulting in different interpretations of the labelling requirements by operators along the value chain or national authorities, thereby risking fragmentation of the internal market.

² See [Close the Glass Loop overview of collection systems for glass packaging across Europe](#)

Waste receptacles

Colours

We consider **the use of background colours for harmonised waste sorting labels will prove confusing for consumers who associate the colours of waste receptacles with separately collected materials**. The colour of waste receptacles is a decisive factor in building sorting habits with consumers and in the case of glass packaging, the result of decades of investment around a strong visual identity. We recommend that **the waste sorting labels do not use a background colour and be based on a black & white monochrome or transparent version to match the background colour of the waste receptacle**. This should apply to all materials and all labels, to avoid cross-contamination of separate collection streams through the wrong association of colours.

In addition, experience shows that changing citizens' waste-sorting habits is complex, time-consuming and resource-intensive. Considering the significant efforts and investments made over many years to achieve current levels of correct sorting, it is essential to maintain existing bin colour systems. Any change to bin colours would likely have a negative impact on sorting quality in the short to medium term, by disrupting well-established consumer behaviours. Furthermore, the JRC report identifies potential colour mismatches across waste receptacles but does not recommend a transition to neutral grey receptacles — a colour often associated by consumers with residual (non-recyclable) waste. Given that waste receptacle colours are not harmonised across the EU and that is not foreseen by PPWR, it is important to preserve nationally established systems that are well understood by consumers.

Text

To complement the specific labels based on the colour of the glass and adapted to local collection practices, **the label on the waste receptacle could display text in the local language(s)** (i.e. "glass", "uncoloured glass", "coloured glass", "green glass" or "brown glass"). This ensures that detailed sorting instructions remain locally relevant while preserving EU-wide harmonisation of core visual elements.

It is also important to note that, where labels only identify the material, there is a risk of consumer confusion. In some Member States, this may lead citizens to mistakenly dispose of all products made from that material — including non-packaging items — in packaging waste receptacles. Conversely, in other Member States, packaging and non-packaging items made from the same material are collected together. This highlights the importance of ensuring that labelling systems take into account national collection practices and provide clear, context-specific guidance to consumers.

3. Additional considerations

Size, dimension and placement of the pictograms for glass collection receptacles

- To ensure effective integration into established communication and consumer engagement strategies, pictograms should remain adaptable in terms of size and dimensions. This flexibility is necessary to align with existing national communication tools and proven design formats, including signage on collection receptacles and related communication materials (e.g. posters and on-container visuals).
- In addition, the JRC study suggests that labels should be placed in the top third of the receptacle. However, in practice, many waste receptacles already feature operators' logos or other essential markings in this area. The JRC rightly acknowledges that decisions on precise label placement should remain with waste management operators. This flexibility should be preserved, allowing label placement to adapt to existing infrastructure and operational constraints, while prioritising visibility and user comprehension rather than imposing fixed positioning requirements.

Placement of the on-pack pictograms: Flexibility should be ensured regarding the placement of the on-pack labels. and the manufacturer should be able to decide whether to display the label on the respective component or the secondary packaging (e.g. a cardboard box containing a glass bottle).

Underground waste receptacles: this collection system has a growing application in densely populated urban areas. Specific technical instructions should be provided in the Labelling scheme Guidelines to ensure the visibility of the labels within all waste collection systems.

Packaging components

- With regard packaging components on the glass packaging itself, we warn that sorting instructions on whether to separate components such as lids and caps from glass containers vary between countries. If the labelling system includes information about packaging components, it could conflict with existing national sorting instructions. It should be clarified that only separate components should be labelled.
- In addition, requirements should be mindful of avoiding the multiplication of waste sorting pictograms on a single packaging item composed of multiple components and materials, which could reduce clarity for consumers and create implementation challenges.

Digital solutions

- While pictograms represent a clear and immediate means of communication to consumers at the point of disposal, it must be seen as part of a broader, complementary information system that also includes digital solutions, such as QR codes or other emerging technologies.
- Digital solutions can enhance consumer information on material composition and how to correctly sort packaging waste, without having to change packaging artwork. They also offer a practical solution to address space constraints on packaging, particularly for small formats and multi-component packaging, and help manage the cumulative impact of labelling requirements stemming from EU and national legislation.

Conclusion

The glass packaging value chain supports the development of a harmonised EU waste sorting labelling system, provided it remains cost-effective, proportionate, flexible and compatible with existing high-performing systems.

The future implementing act should: **ensure full flexibility for packaging labels, including the unconditional possibility to use text-free and colour-free options; maintain pictograms as the core harmonised element; preserve existing national collection systems and infrastructure; and provide clear and harmonised guidance to avoid divergent interpretations across Member States.**

This is essential to ensure that the system reinforces, rather than undermines, Europe's strong circularity performance for glass packaging and the continued progress towards higher collection and recycling rates.

SIGNATORIES

European level:



CEEV - Comité Européen des Entreprises Vins



EXPRA – Extended Producer Responsibility Alliance



FERVER – European Federation of Glass Recyclers



FEVE – the European Container Glass Federation



NMWE - Natural Mineral Waters Europe



spiritsEUROPE



The Brewers of Europe



UNESDA – Soft Drinks Europe

National level:

Austria



Italy

Consorzio Recupero Vetro



CONSORZIO RECUPERO VETRO

The Netherlands

Stichting Duurzaam Verpakkingsglas



Poland

Zwiazek Pracodawcow Polskie Szklo



Portugal

Plataforma Vidro+



Spain

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Sweden

Svensk Glasåtervinning AB

