



FERVER
European Federation of Glass Recyclers
Fédération Européenne des Recycleurs de Verre

Rue de la Science 23 B – 1040 Brussels
info@ferver.eu
tel: +32 2 757 91 70
fax: +32 2 240 27 29
www.ferver.eu

Brussels, 21/07/2026

**FERVER position on Extended Producer Responsibility:
EPR must support the entire treatment and recycling chain to
deliver a circular economy for glass**

FERVER considers it essential that the forthcoming Circular Economy Act establishes a coherent framework for Extended Producer Responsibility (EPR) and provides clear principles governing its design and implementation across the European Union. As a key instrument of circular economy policy, well-designed EPR schemes are a powerful instrument to increase resource efficiency, divert waste from landfill, and contribute to improved waste prevention, collection, sorting, treatment and recycling, while promoting the incorporation of recycled materials into new products. When properly implemented, EPR schemes can support higher recycling rates, stronger eco-design incentives, increased use of recycled glass cullet and a more competitive and resource-efficient European economy.

However, EPR must remain a means to achieve environmental objectives rather than an objective in itself. EPR schemes should only be introduced where a clear market failure exists and where they can demonstrably improve environmental and economic outcomes.

Importantly, EPR should cover the full waste management and recycling value chain, including collection, sorting, treatment and recycling. Collection is only the first step towards circularity. The environmental benefits of EPR are only realised when collected materials are effectively sorted, processed and recycled into high-quality secondary raw materials capable of replacing virgin resources. Glass recyclers therefore play a fundamental role in delivering the objectives of EPR by transforming collected glass into valuable cullet and minimising the amount of waste sent to landfill. At the same time, higher collection targets must be accompanied by measures that ensure a stable market for recycled materials. In particular, the obligation for producers to incorporate or take up recycled glass cullet through EPR should be strengthened, as increasing collection without corresponding demand risks creating a surplus of cullet on the market, undermining both recycling economics and circularity objectives. Restricting EPR financing to collection activities alone would be inconsistent with the objectives and legal definition of Extended Producer Responsibility under the Waste Framework Directive and would fail to address the real and full costs required to deliver high-quality recycling and circularity.



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EPR must finance the entire treatment process

For glass packaging and other glass products, environmental performance is achieved when collected material is effectively sorted, processed into high-quality cullet and reintroduced into manufacturing processes. Collection alone does not create circularity.

EPR schemes should therefore cover the net costs associated with:

- Collection systems;
- Sorting;
- Treatment and preparation for recycling;
- Recycling operations;
- Investments necessary to improve collection and recycling infrastructure;
- The management of unavoidable residual waste generated during glass recycling processes, including any applicable local or national disposal taxes.

Financing only collection risks creating a disconnect between collection performance and actual recycling outcomes. Such an approach may increase collected volumes while failing to ensure that collected glass is transformed into secondary raw materials capable of replacing virgin materials.

In addition, the residual waste generated during glass recycling is an unavoidable consequence of processing collected glass and does not originate from the recycling operations themselves. As glass recyclers are not responsible for the generation of this waste, the associated disposal costs and taxes should be covered through EPR schemes rather than borne by recyclers. EPR should incentivise the entire value chain and reward actual recycling performance.

Finally, the production of high-quality glass cullet also generates a fine fraction, which is a by-product of the recycling process. While technological solutions exist to recover part of this material for use in glass manufacturing, its suitability depends on quality requirements and not all glass producers are currently able to incorporate it into their furnaces. Where the fine fraction cannot be recycled back into glass production, despite best available practices, the associated treatment and management costs should be recognised as an integral part of the recycling process and be eligible for support through EPR schemes.

EPR schemes should only be introduced where market failures exist

EPR schemes should not be introduced as a default regulatory instrument. Instead, they should be established only where a clear market failure occurs.

The Circular Economy Act should therefore define objective criteria for identifying market failures, including situations where:

- Recycling is structurally not economically viable;



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- Recyclable glass is landfilled or incinerated despite available recycling capacity and technology;
- Collection, sorting or control systems are inadequate;

A thorough assessment should be conducted before introducing new EPR obligations to ensure proportionality, effectiveness and regulatory certainty.

Financial EPR should remain the preferred model

FERVER strongly supports financial EPR systems as the preferred governance model.

Under a financial EPR system:

- Producers finance waste management activities throughout the end-of-life phase;
- Waste management and recycling operations remain open to competition;
- Recyclers compete on quality, environmental performance and efficiency;
- Market access is preserved through transparent and competitive procurement procedures.

To maximise environmental outcomes, FERVER also supports EPR governance models that operate on a non-profit basis, ensuring that producer contributions are fully reinvested in improving collection, sorting, recycling performance and infrastructure across the entire value chain. EPR schemes should prioritise environmental objectives and circularity over financial returns, with resources dedicated to delivering high-quality recycling outcomes rather than generating profits.

By contrast, operational EPR systems, where producers or PROs both finance and directly control waste operations, can create significant risks:

- Reduced transparency;
- Market foreclosure;
- Distorted competition;
- Vertical integration advantages;
- Reduced opportunities for independent recyclers.

EPR should provide financing and incentives while allowing specialised waste management and recycling operators to perform operational activities.

Eco-design and recycled content incentives

Eco-modulation should be used as a tool to encourage circular product design.

Lower EPR fees should apply to products that:

- Incorporate recycled content, particularly EU-sourced glass cullet;



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- Demonstrate high recyclability;
- Are reusable or durable;
- Facilitate high-quality material recovery.

Higher fees should apply to products that:

- Do not meet circular design principles;
- Hamper recyclability;
- Increase treatment complexity or costs.

Eco-modulated fees should rely on harmonised and transparent criteria developed in close cooperation with glass recyclers and other stakeholders to ensure environmental effectiveness and practical implementation.

Supporting the market for recycled glass cullet

The use of recycled glass cullet delivers significant environmental benefits, including reduced energy consumption, lower greenhouse gas emissions and reduced demand for virgin raw materials.

EPR schemes should therefore support targeted economic incentives that:

- Encourage producers to use recycled EU glass, helping to bridge temporary market imbalances;
- Mitigate price differences between virgin raw materials and recycled cullet;
- Support stability and resilience of European glass recycling markets.

Strengthening end-market demand is essential to ensure that collected and recycled glass remains within a functioning circular economy.

Transparency, governance and accountability

Well-functioning EPR schemes require strong governance and transparency.

Producer Responsibility Organisations should:

- Publish quarterly disaggregated data on products placed on the market;
- Report collection, sorting, recycling and final treatment results;
- Identify potential free-riders and support enforcement actions.

Service contracts financed through EPR funds should be awarded through open, transparent and competitive tendering procedures.

Transparency is essential to maintain trust among producers, recyclers, public authorities and citizens.



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National implementation and independent oversight

FERVER supports maintaining EPR implementation at Member State level. While common EU principles are necessary, EPR schemes should remain adapted to national legislation, waste management systems and market conditions. Member States should establish independent monitoring and advisory bodies that include representatives from waste management operators and glass recyclers. These bodies should:

- Monitor performance: ensure EPR schemes deliver measurable environmental and economic results
- Guide fee design: provide expert input on fair and consistent fee modulation
- Ensure transparency: oversee PROs and verify alignment with the public interest
- Drive eco-design: link fees to durability, recyclability, and recycled content
- Support investment: promote local collection, sorting, and recycling infrastructure

FERVER does not support the creation of EU-wide Producer Responsibility Organisations. PROs should remain regulated and supervised by national authorities.

Tackling free-riding and ensuring fair competition

A level playing field is essential for the success of EPR systems. Public authorities should ensure effective enforcement against producers placing products on the market without fulfilling EPR obligations. Authorities should be supported by customs services and market surveillance bodies to identify non-compliant operators.

Online marketplaces should also play an active role by:

- Verifying EPR compliance of sellers;
- Ensuring that products sold through their platforms comply with national and EU obligations;
- Cooperating with enforcement authorities.

Robust enforcement protects compliant producers and safeguards the financial sustainability of recycling systems.

Conclusion

FERVER supports EPR schemes that are transparent and designed to strengthen the circular economy.

To achieve their objectives, EPR schemes must finance the entire waste management chain, including collection, sorting, treatment and recycling.



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The ultimate objective of EPR should be to reward circular product design, increase both the collection and the use of recycled materials, support high-quality recycling and promote sufficient market demand to absorb growing supplies of recycled glass, enabling high-quality cullet to effectively replace virgin raw materials. In doing so, EPR will ensure that producers contribute fairly to the full end-of-life management of the products they place on the market.

Note to editor

As the European federation of glass recycling companies, FERVER brings together industry leaders from 25 countries and its members are, amongst others, responsible for recycling around 70% of Europe's packaging glass waste into high-quality cullet – a key raw material used to produce new glass products. FERVER members recycle both container glass and flat glass. FERVER therefore plays a vital role in closing the loop for glass and advancing circularity across Europe.