

**COM/2023/451 Proposal for a Regulation on circularity requirements  
for vehicle design and on management of end-of-life vehicles,  
amending Regulations (EU) 2018/858 and 2019/1020 and repealing  
Directives 2000/53/EC and 2005/64/EC**

**Consultation Response - British Glass**

**Impact of EU Act**

**1 Does it appear likely that the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

No

**Tell us why :**

No negative impacts are foreseen

**2 Does it appear likely that NOT APPLYING the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

**Tell us why:**

It would likely lead to less recycling of the parts from vehicles and could lead to more contamination and landfilled waste if no implemented.

**3 Are there any other matters regarding the proposed EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.**

Yes

**Tell us why :**

Flat glass components used in vehicles, e.g., windscreens, side windows, or panoramic sunroofs, enable users' visibility, safety and comfort.

If one dismantles and sorts automotive glass parts correctly at the end-of-life of vehicles, recycling this glass is possible. This reduces raw materials consumption by 1.2 tonnes for each tonne of used cullets. It also reduces CO2 emissions, cutting at least 600 kgCO2 from the production process for each tonne of used cullets[1].

Today, however, treatment facilities rarely dismantle automotive glass parts before shredding vehicles (less than 10% of the time). This is problematic for glass recycling

since, once shredded, other vehicle materials will contaminate the crushed glass (a.k.a. “cullet”), which prevents it from being transformed into new glass products.

Dismantling glass parts at the end-of-life of vehicles is therefore a crucial starting point to increase the availability of quality cullet from automotive glass.

Glass for Europe supports the European Commission’s (EC) provisions on glass dismantling in the proposal for an End-of-Life of Vehicles (ELV) Regulation.

This provision alone has the potential to increase the availability of high-quality glass cullet that is required to increase recycled content and improve circularity and sustainability in glass manufacturing.

### 1. Why a mandatory glass dismantling provision?

Recycling cullets contaminated by non-glass components is unsafe as it can seriously damage the glass manufacturing industrial equipment[2].

Additionally, it risks hindering the properties of the future glass parts and the safety of pedestrians and passengers.

When Authorised Treatment Facilities (ATF) dismantle and sort the glass, the dismantling process required to avoid contamination depends on the parts (and the non-glass elements they contain). In principle, these processes are sufficiently effective to enable recycling of the resulting cullet.

Across several glass sectors, there is a high demand for high-quality glass cullet. As soon as the dismantling of automotive glass takes place before shredding, this glass cullet becomes a resource for which a very competitive market exists. Today, in more than 90%[3] of the cases, there is no recovery of glass before shredding, resulting in contamination of the cullet. This market failure needs to be overturned by a mandatory glass dismantling provision.

### 2. Why is a recycled content obligation not adapted to automotive glass?

The provision on glass treatment of the EC proposal for an ELV Regulation is the best approach to turning automotive glass waste into a resource. It outranks the policy option of a recycled content target for automotive glass because the latter is not expected to increase the availability of automotive glass cullet.

A recycled content target will simply shift overly limited glass cullet resources from one flat glass product type, e.g. building glass, to another, e.g. automotive, without generating any increase in recycling rates.

It would also transfer the responsibility of achieving the target to glass manufacturers whereas dismantling and sorting glass to obtain more cullet from vehicle treatment is out of glass manufacturers’ control. It is the responsibility of ATF to dismantle the glass,

eventually financially supported by an automotive Extended Producer Responsibility Scheme, and glass companies will compete to access the resource.

Glass for Europe calls on policymakers to maintain the EC proposal on glass dismantling and recycling of the future ELV Regulation.

Only such a mandatory glass dismantling provision will allow the legislation to produce tangible results in terms of automotive glass recycling and positively contribute to circularity and greater sustainability.