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Position paper on the European Green Deal: operationalising the decarbonisation agenda

Europe's flat glass industry welcomes the release of the **European Green Deal** and the Commission's ambition to actively operationalize a decarbonisation agenda across all relevant policies.

The European flat glass sector takes it as its role to produce at a competitive price the materials essential **for renovating Europe's buildings**, for supporting **the clean mobility transition** and for increasing **the share of renewable** solar energy in Europe. At the same time, while already providing net carbon-avoidance products, **the flat glass sector is looking into ways to massively scale up its contributions to the carbon neutral transition**, including by developing novel ways to lower its industrial emissions.

Glass for Europe's believes that actions should be undertaken without undue delay in the sectors with high reduction potential and where solutions to decrease emissions already exist, such as the building sector. It stands clear that this decision will require an unprecedented collective effort from citizens to businesses and call for a rethink and adaptation of the EU legislative framework.

Developing an industrial strategy to support the transition to a carbon neutral EU.

Flat glass is a strategic non substitutable material. To Glass for Europe, the EU industrial strategy and all relevant climate-related policies should take into account the crucial role of strategic value chains enabling decarbonisation. As the demand for strategic materials will increase, it is pivotal to give room for growth in Europe for decarbonisation-enabling solutions that are non-substitutable, such as flat glass, so long as their manufacturing process is not yet largely decarbonised.

The industrial strategy should address the remaining structural obstacles to the massive decarbonisation of industrial processes which are limited in their mitigation potential by existing technologies and today's scientific knowledge. Adequate competitiveness mitigation tools should be designed to ensure EU made products' affordability to consumer.

Prioritising the reduction of energy to deliver an Energy Positive Building Stock by 2050

Only an unprecedented renovation campaign, entailing legally binding objectives, can deliver a decarbonised building stock by 2050. To achieve this goal, carbon neutrality should be used as reference for an early revision of the Energy Performance of Buildings Directive which effectively triggers an upgrade of minimum performance requirements of building components in all Member States.

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In order to decarbonise the European building stock, reliable information on the production of construction materials is needed. To that end, Environmental Product Declarations (EPDs) and Life Cycle Assessment (LCA) of materials and products should include the carbon avoidance of products during their use phase to reflect their effective contribution to decarbonisation.

Flat glass as an enabler of clean mobility

Automotive and transport glass contribute to the reduction of CO_2 emissions and are essential for the future automated mobility. In the short term, measures such as the update of the automotive test cycle (WLTP) to reflect the real energy consumption and emissions of vehicles could incentivise the uptake of available technologies from automotive suppliers which minimize the use of air-conditioning and related emissions. In addition, the EU should also define pathways for the reduction of vehicles' weights to drastically reduce consumption and CO_2 emissions from conventional vehicles, while supporting the development of light-weight components for electric cars.

Ensuring industry competitiveness along the decarbonisation journey

EU diplomacy in international organisations and trade negotiations will play a major role in bringing EU partners to adopt equivalent measures to tackle climate change. As long as non-EU industrial competitors produce goods with higher CO_2 footprint without being subject to equivalent carbon pricing, the EU must be able to ensure the competitiveness and attractiveness of low-carbon EU made products.

To Glass for Europe, a proper functioning of the EU ETS scheme, including by granting EU industrial actors subject to risks of carbon leakage adequate levels of free allocations is crucial. Other mitigation tools, such as a carbon border adjustment mechanism, should be investigated to analyse benefits and risks over the medium / long term.

Removing barriers for the transition to a Circular Economy

Today, administrative barriers in the value-chain still hamper the proper use of resources such as recyclable glass. For instance, flat glass off-cuts are not recognised as by-products in all EU Member States and this creates problems for the transportation of recyclable flat glass within the EU.

To facilitate the circularity of construction and demolition waste, Glass for Europe calls for a revision of waste legislation and in particular:

- Setting individual targets for specific recyclable building materials, like building glass, whose recycling is not incentivised by a building target based on total building weight
- The introduction in legislation of obligations for pre-demolition audits for large buildings
- To grant free access to container parks to dispose recyclable construction materials
- The support to the development of collection and sorting schemes for post-consumer building glass products.

Clean, Reliable and Affordable Energy to enable the decarbonisation of EU economy

Glass for Europe believes that moderating energy demand and incentivising on-site renewables in the building sectors are the most actionable measures to reduce CO_2 emissions in the short and medium term.

Certain sectors of the economy, such as high temperature industrial processes, are likely to need vast amount of low carbon energy sources to decarbonise their production. A comprehensive strategy to ensure the production, storage and distribution of renewable energy like biogas, hydrogen and carbon-neutral electricity is needed. Such a strategy should be conceived to ensure a constant, reliable and cost-efficient supply to industry.

Activating financial mechanisms to trigger decarbonisation

The wide scale renovation of buildings requires that EU financial mechanisms are activated to unlock massive investments from the private sector.

Research and development of breakthrough technologies in manufacturing processes and in material science are still needed to decarbonise certain industries such as the flat glass sector. The EU R&D policy should not limit itself to demonstration projects, but also support research in fundamental science and technology.

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Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances. Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group and Saint-Gobain Glass Industry, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.