

Glass Alliance Europe's Feedback on the Commission Implementing Regulation laying down Rules Regarding the Content and Format of Climate-Neutrality Plans Needed for Granting Free Allocation of Emission Allowances under the EU ETS.

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Glass Alliance Europe fully supports the decarbonisation objectives set out in the Climate Law to address climate change and its harmful consequences on our planet. Glass Alliance Europe members are committed to playing their part in the EU's decarbonisation journey. Several technologies exist or are under development to make headway, such as the transition from fossil fuel to carbon neutral energy for the melting process.

In the glass industries, the calendar for measures and investments in the installations is tied to the lifetime of the melting furnace, in particular for major upgrades and significant modifications such as new technologies leading to the reduction in terms of absolute emissions or emissions intensity. This is due to the nature of glass-making characterized by a high-temperature continuous production process which cannot be stopped without damaging the furnace and industrial equipment. In the glass industry, the lifetime of a furnace is 10 to 20 years (depending on the glass sub-sector). This timeframe exceeds the reporting periods included in the proposal for the annual targets and 5-year milestones to demonstrate progress in emissions' reduction.

Therefore, the European glass industry calls on the legislator to take this industrial reality into account and to adapt the proposal accordingly. In particular, when it refers to the milestones and targets, the framework should acknowledge that the progress it refers to (i.e. the reduction in absolute emissions or emissions intensity) cannot be linear across all industries since it will occur along-the investment cycles of the installations which can exceed the annual and 5-year period for certain industries, such as the glass sectors.