

GENERAL BLOCK EXEMPTION REGULATION

Answer to the consultation on GBER

Glass Fibre Europe welcomes the European Commission's initiative to gather stakeholders' views in the context of the preparation of a new General Block Exemption Regulation (GBER).

Glass Fibre Europe is the European trade association representing producers of continuous filament glass fibre, a strategic material used in reinforced composites and technical textiles across a wide range of downstream sectors, including construction, wind energy, transport, and industrial applications.

We acknowledge and support the underlying objective of the GBER to provide Member States with a clear and predictable framework enabling the swift deployment of State aid, provided that conditions are met to limit distortions of competition within the Single Market. In this context, we wish to draw the European Commission's attention to specific exclusion criteria contained in **Articles 51(3)(b), 52(3)(b), and 55(3)(d), which, as currently drafted, effectively render investments in the continuous filament glass fibre sector ineligible for aid.**

These provisions exclude "aid for investments in equipment, machinery and industrial production facilities using fossil fuels, including natural gas, including when fossil fuels are used in combination with other energy sources." While we understand the intention to avoid lock-in effects and support the European Union objective to become climate neutral by 2050, the practical effect of this wording is a *de facto* ineligibility of our industries where no fully fossil-free technological alternatives to hybrid furnaces are currently available.

In the glass fibre sector, high-temperature melting processes are indispensable and require a continuous and stable energy supply. **At present, there are no commercially available and technologically mature options that would allow a full switch to carbon-neutral energy sources for these processes.** As documented in recent technology assessments and sectoral studies (see attachments), the best available techniques in the sector currently rely on a combination of electricity and natural gas. Electricity alone cannot yet meet these requirements at the necessary scale, and the full substitution of natural gas with hydrogen is not sufficiently mature for deployment under industrial conditions.

Against this background, the current exclusion criteria risk unintentionally penalising investments that are nevertheless essential for decarbonisation and energy efficiency improvements.

In this context, Glass Fibre Europe calls on the European Commission to reconsider and refine the relevant provisions of the GBER so that they better reflect the technological realities of the sector, as well as the investment cycles typical of continuous filament glass fibre manufacturing. In particular, investments made today will not determine the level of emissions in 2050, as furnaces are rebuilt approximately every twelve years. A more nuanced approach would therefore allow Member States to support credible and progressive decarbonisation pathways, mitigate carbon leakage risks, and promote investments that already contribute to reductions in emissions and energy consumption.

About Glass Fibre Europe – EU Transparency Register n°635608817518-09.

Glass Fibre Europe, founded in 1987, is the voice of the European continuous filament glass fibre industry. It is composed of 7 companies: 3B the fibreglass company, Envalior, FYSOL SAS, Johns Manville, Owens Corning, Valmiera Glass, and Saint-Gobain Vetrotex. Glass Fibre Europe represents all the major producers of continuous filament glass fibre in Europe.

The continuous filament glass fibre industry is the cornerstone of the glass-based composite materials and technical textiles value-chains. Glass fibre's unique properties enable the production of wind energy, electric and electronic devices, and the development of sustainable solutions in a wide range of applications, such as transport and construction.

Glass Fibre Europe

European Glass Fibre Producers Association (aisbl)

Avenue des Arts 3-4-5, 1210 Brussels, Belgium
Tel: +32 478 18 53 08
Email: info@glassfibreeurope.eu

www.glassfibreeurope.eu