

21 November 2025

To the attention of:

President Ursula von der Leyen, European Commission

EVP Teresa Ribera, Clean, Just and Competitive Transition

EVP Stéphane Séjourné, Prosperity and Industrial Strategy

Commissioner Valdis Dombrovskis, Economy and Productivity; Implementation and Simplification

Commissioner Jessika Roswall, Environment, Water Resilience and a Competitive Circular Economy

Simpler packaging minimisation rules urgently needed to promote EU industry's competitiveness, creativity and innovation

We, as CEOs of Europe's leading container glass manufacturing companies are writing to highlight our deep concern about the **significant negative impact that the packaging minimisation requirements of the new Packaging and Packaging Waste Regulation (PPWR) risk having on the global competitiveness of key European industrial value chains that rely on glass packaging – including food, wines, spirits, cosmetics, perfumery, beer, non-alcoholic beverages and other design-driven sectors.** These provisions risk undermining the Clean Industrial Deal and the efforts to strengthen Europe's industrial competitiveness by sustaining its global leadership in innovation and circularity performance.

With 130 facilities in 21 EU Member States and thousands of customers, from large multinationals to SMEs, the container glass industry employs 50,000 people and contributes to 825,000 jobs across Europe in industries selling glass-packaged goods. Our industry's commitment to excellence in manufacturing and sustainability defines European quality, creativity and packaging design worldwide. **Glass-packaged products embody Europe's most successful and globally recognized brands, combining superior quality with advanced manufacturing, sustaining millions of jobs and driving exports worldwide.** These products alone account for €140 billion in EU exports every year – nearly 6 % of the Union's total trade. Collectively, we stand at the intersection of culture, craftsmanship and circular innovation, continuously investing in sustainability while preserving the quality, safety and distinctiveness that define European production.

As an energy-intensive sector, European glass manufacturers are investing heavily in decarbonisation, energy efficiency, and furnace upgrades, while leading on circularity. Glass is infinitely recyclable, with very high collection (80.8%) and recycling rates (74.9%) across Europe. **Recycled glass is already the main raw material used in production of new glass containers, and we stand ready to support the uptake and growth of reuse systems across the EU.**

Yet, all these efforts depend on a clear, supportive and coherent regulatory framework. While our industry is actively working to ensure a successful PPWR implementation, there is mounting concern about the impact of the extremely rigid packaging minimisation requirements contained in **Article 10, Recital 60 and Annex IV of the new Regulation** on the ability of EU design-driven industries to continue to innovate and compete globally.

In particular, **the PPWR requirement that all packaging is reduced to the "minimum necessary" weight and volume by 1st January 2030 without consideration for marketing, brand differentiation, product presentation and consumer acceptance needs to be reconsidered as it unduly restricts packaging design and innovation in Europe, with incredibly damaging business**

impact on entire European value chains and on the ability of EU brands and SMEs to compete globally.

While realistic packaging minimisation measures, combined with other ambitious sustainability requirements, can lead EU industries to further improve the eco-design of packaging, foster lightweighting and reduce excessive packaging waste, **the current wording of the above-mentioned provisions is disproportionate, brings huge legal uncertainty in the market, discourages investment and innovation in design and manufacturing and risks shifting production and value creation outside the EU.**

We therefore call on the Commission to adjust Article 10 and related PPWR provisions via the upcoming Environmental Omnibus or other legal tools to provide clarity, proportionality and legal certainty to our industry and our customers. This is needed in order to ensure compliance, restore coherence between environmental ambition and industrial competitiveness and safeguard investment, innovation and skilled employment in Europe.

The pragmatic adjustments we are advocating for – further detail can be found in the annex below – are essential to recognize the important role that key drivers of economic competitiveness such as marketing, brand differentiation, product presentation and consumer acceptance play in ensuring the leadership of European brands and high-quality productions in today's globalized world. **This is crucial to avoid drab uniformity on shop shelves and prevent the erosion of Europe's leadership in glass packaging and product design, creativity and premium manufacturing across a number of key industries such as beverages, spirits, gourmet food, cosmetics and perfumery.**

The EU's circular economy goals can only be achieved if its industries remain strong and competitive at home. We stand ready to work with EU institutions to make this a reality.

Yours sincerely,

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Biagio Costantini
CEO, Zignago Vetro Group

FEVE's KEY ASKS ON PACKAGING MINIMISATION

Main concerns with the current wording of PPWR Article 10, Recital 60 and Annex IV

1. Too rigid packaging minimisation criteria neglect the real drivers of global competitiveness

Article 10 requires all packaging to reduce weight and volume to the minimum necessary by 2030, following performance criteria listed in Annex IV. These criteria exclude marketing, product presentation, brand identity and consumer acceptance, which are core elements for the global competitiveness of European glass-packaged goods. For sectors such as wine, spirits, cosmetics, perfumery, beverages and gourmet foods design freedom is essential.

2. Lack of legal clarity on key concepts such as “functionality” and “shape”

PPWR does not clearly define “packaging functionality” or “shape”, leaving room for diverging interpretations across Member States and making the provision unworkable from a compliance perspective. The term functionality is inconsistently defined: Article 3(1) includes product presentation as a function, while recital 60 and Annex IV explicitly exclude marketing, consumer acceptance and brand identity as valid justifications. Likewise, the absence of a definition of “shape” risks leading to diverging interpretations across the Single Market and disproportionately affects glass packaging, where shape and design are integral to product identity and consumer recognition.

3. Insufficient protection of intellectual property and innovation

Article 10(2)(a) only protects designs and trademarks registered before 11 February 2025. This cut-off date is highly problematic: all new packaging placed on the EU market from now on would not be able to enjoy meaningful IP protection, thus discouraging innovation and creativity in glass packaging. Moreover, design rights are not absolute and are usually challenged, while many products are regularly redesigned, meaning that renewals could cancel existing exemptions. Such limitations constrain brand identity and hinder innovation, weakening the competitiveness of Europe’s most creative and premium glass packaged products.

4. Risk of setting rigid maximum weight and volume limits

Article 10(3) allows harmonised standards to set maximum weight/volume thresholds for “most common packaging types”. Such fixed limits contradict Article 10’s case-by-case approach, do not reflect product diversity, and would severely restrict innovation and design freedom in the glass sector.

FEVE’s recommendations

1. Ensure a fair balance between packaging minimisation and design freedom

Article 10(2) (and corresponding Recital 60) should be revised to recognize that minimisation must coexist with marketing, product presentation, brand identity and consumer acceptance, particularly for high-value sectors where design is intrinsic to the product. Annex IV should also broaden the concept of “packaging functionality” to cover cases where design is an inherent part of consumer expectations and brand experience, particularly (but not only) for high-end goods.

2. Strengthen IP protection and review the 2025 cut-off date

Article 10(2)(a) and Recital 60 should be revised to review the cut-off date of 11 February 2025, which would leave designs registered afterwards without protection and discourage innovation. This is essential for sectors where design cycles are short and creativity drives competitiveness. Exemptions should also apply to redesigned or renewed products, as regular updates are essential to competitiveness in sectors such as cosmetics, perfumery and premium beverages.

3. Amend the references to maximum weight/volume limits

References to maximum weight, volume, wall thickness or empty space in Recital 62 and Article 10(3) must be amended. Harmonised standards should provide assessment methodologies, not fixed thresholds. Rules must remain flexible, workable, and consistent with Article 10(1)’s product-specific, case-by-case approach. Rigid limits are unworkable for glass packaging, which serves a wide variety of products with different needs, and would undermine design freedom, innovation and product differentiation. This would be the only way to safeguard innovation while ensuring the Regulation remains workable in practice.