



EuRIC welcomes the new proposal for End-of-Life Vehicles and proposes improvements

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As the umbrella organization for recycling industries representing most of the End-of-Life-Vehicles (ELV) recyclers across the EU, EuRIC welcomes the publication of the long-awaited Commission proposal to revise the ELV Directive.

- **Emphasis placed on better enforcement is a must.**

EuRIC strongly supports the choice of a regulation instead of a directive and the merger with the 3R type approval directive in order to better harmonize requirements across Member States and tackle circular design in the same instrument. In addition, new requirements aiming at increasing the enforcement of the new ELV regulation and foster cooperation across Member States have a key role to play in tackling lasting illegal practices which unlevel the playing field at the expense of compliant operators. EuRIC strongly welcomes the procedures laid down to ensure that end-of-life vehicles are not exported as used cars and the mandating, in line with EuRIC steady position, to require that the vehicle to be exported as a used car is effectively roadworthy and not de facto an ELV whose export is prohibited.

- **Strong support for recycled content targets for plastics in cars and beyond.**

In addition, EuRIC welcomes the emphasis placed on the life cycle approach embodied in the proposal. In particular, the recycled content target of 25 % of plastic from post-consumer plastic waste into new cars to enter into force 6 years after the adoption of the new ELV regulation will be a game-changer. It is strongly welcomed at a time when prices are dropping to record low levels, which is yet another testimony that linear value chains still have a strong economic edge. With 80% of ELV plastics going for incineration or landfilling, recycled content targets are critical to enhance the circularity of plastics in the automotive sector. In particular, such targets will contribute to better design plastic car parts and further increase the ongoing cooperation between plastic recyclers and the automotive industry. They will also boost investments needed to scale up industrial capacities to recycle technical plastics within the EU.

EuRIC also welcomes the monitoring of recycled content for metals, be them base metals or critical metals, into new cars. EuRIC believes that there is room to turn these requirements into realistic yet

ambitious recycled content targets in particular for steel so as to reward improved quality of recycled metals. This will also support the European metal industry in achieving its net-zero industry target.

EuRIC will also advocate for the inclusion of recycled content targets for tyres which are urgently needed to deal with the ever-increasing amount of tyres being co-incinerated or landfilled instead of being recycled. The EU legislative framework must send an urgent message that the future of end-of-life tyres is not final disposal but recycling back into tyres and other car parts made of rubber.

- **Technological neutrality is essential to preserve jobs while boosting technically and economically viable material recycling.**

The automotive industry is experiencing a drastic technological transition that impacts its business model. For the next 10 to 15 years, ELV recyclers must remain able to recycle the 250+ million combustion engine vehicles still in use and adapt in parallel to electric vehicles. EuRIC supports dismantling obligations to ensure the proper treatment of car parts containing hazardous substances as well as the removal of car components for re-use. However, imposing removal obligations for material recycling will lead to excessive costs, staff shortages, and no improvement in the quality of recycled materials. Thus, it is of utmost importance to guarantee, as proposed, that removal obligations can be met either by manual dismantling or after shredding through post-shredding technologies which guarantee a similar level of recycled materials' quality, at economically affordable costs. It is crucial to safeguard the substantial investments made by ELV recyclers in advanced post-shredding technologies. These technologies, with increased automation, enable the recovery of specific material grades that meet the high-quality standards demanded for end-applications, be it in automotive or other end-markets.. This is all the more essential as post-shredding technologies are developed by European-based companies that are technological leaders globally.

- **EPR Schemes are no silver bullet for improving circularity targets and must factor in past investments.**

88% of the costs born to meet the requirements of the current ELV Directive have been made by the European recycling industry. This amounts in practice to 9 billion € worth of investments only for the mechanical treatment part, leaving aside collection and post-treatment. The fact that ELVs have a positive value has rendered the need for EPR support minimal. Building on that legacy, EPR models such as the one in Belgium or Spain, which are mostly financial and have contributed to bridging the interests of the automotive and recycling industry, shall remain pertinent under the new rules. EuRIC welcomes in particular the choice left to the automotive producer to choose between a collective or individual model of extended responsibility. In addition, to foster cooperation and spur circularity in the automotive sector, recyclers should also be represented on the board of EPR schemes as already the case in Belgium or Spain.

Quote from Olivier François, President of EuRIC

EuRIC welcomes the publication of the long-awaited Commission proposal to revise the ELV Directive. ELV recycling has been a success story for more than two decades. It is important to preserve what fundamentally works while at the same time raising the level of ambition to recycle more, better and back into cars wherever feasible. EuRIC looks forward to working with the co-legislators to extend recycled content targets beyond plastics, further strengthen technology-neutrality as a key driver to quality and economic viability and ensure that the very functioning of EPR Schemes will factor in recyclers' leading role in the capacity building for the treatment of ELVs over the last 20+ years.