

6TH INTERNATIONAL FORS CONFERENCE RECYCLING OF END-OF-LIFE VEHICLES IN THE COUNTRY AND IN THE WORLD NEW ELV LAW IN EUROPE – NEW CHALLENGES

FORS Car Recycling Forum Association

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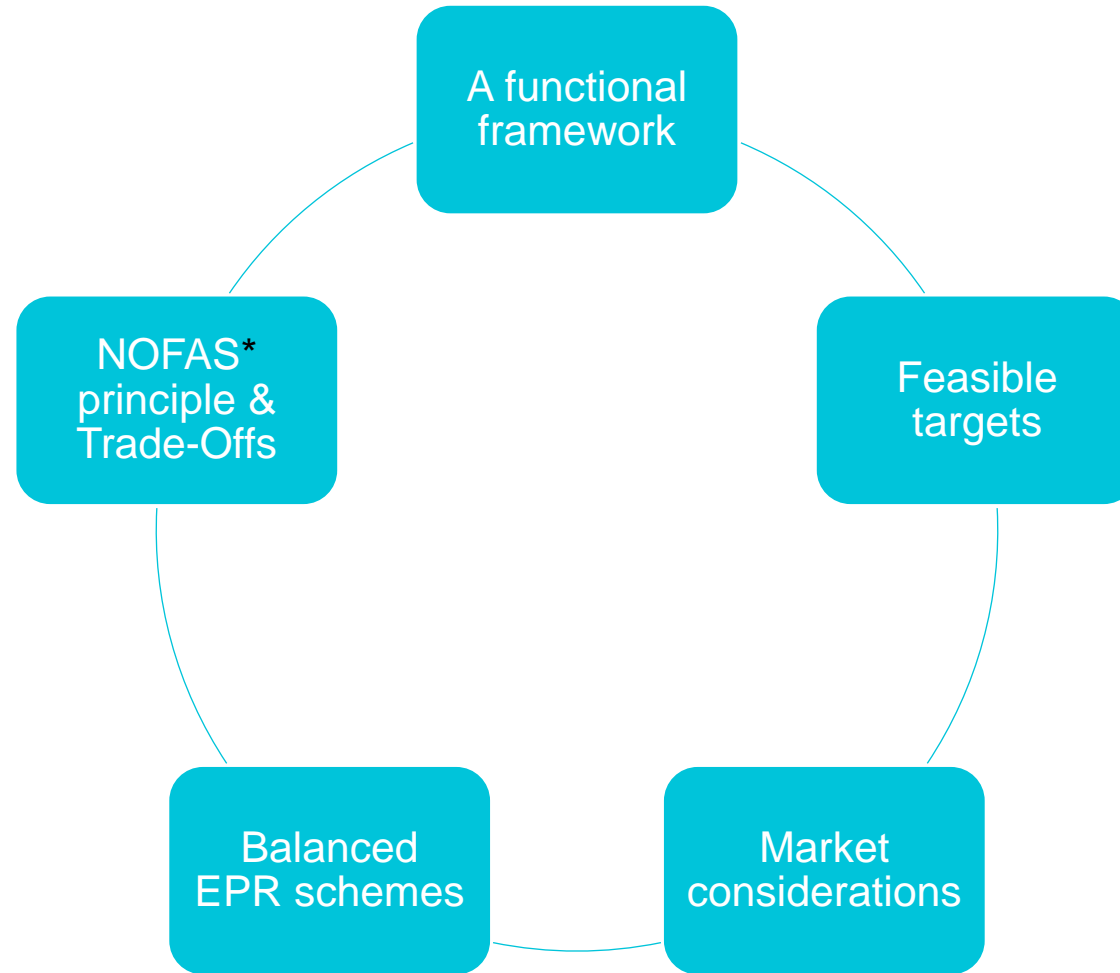
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WHO WE REPRESENT

HOW TO IMPLEMENT THE ELVR



*No One Fits All Solution

A FUNCTIONAL LEGISLATIVE FRAMEWORK

- The ELVR should be the central legislation for circularity in the automotive sector:
 - Double regulation and overlapping provisions must be avoided.
- Guarantee coherent and consistent implementation requirements:
 - Provide a clear methodology before targets come into effect.
- Need for tailored approaches:
 - Harmonization is important but approaches like ESPR and PPWR cannot be simply copied across as they are for vehicles and replicated in the ELVR.
- Ensure globally discussed and agreed definitions across the value chain:
 - Align with and make use of existing standards.
- Requirements should only apply to new types.

A FUNCTIONAL LEGISLATIVE FRAMEWORK

- Lead time:
 - Ensure that extended negotiations do not lead to premature enforcement or implementation of various requirements and provisions.
 - Secure consistent timelines, with correct order of application e.g. methodology, targets, implementation, review.
- Active industry engagement:
 - Crucial role of industry participation in shaping secondary implementing legislation.
- Enforcement:
 - Regulation to effectively implement and enforce vehicle circularity objectives.
 - Develop comprehensive inspections to monitor compliance and effectiveness of the Regulation.
 - The COD finally needs to become the EU wide tool.

FEASIBLE TARGETS

- Establish realistic targets for recycled plastics:
 - Set achievable goals that reflect actual capabilities and realistic market availability.
 - Stepwise approach: first target of 15% within 72 months of regulation enactment, then 20% 5 years later.
- Incorporate review clause:
 - Include provisions for ongoing evaluation to keep targets aligned with market changes (in line with the Battery Regulation and Packaging Regulation).
 - Start with realistic targets and conduct feasibility studies before the second step to make sure the 20% target is fit for purpose or has to be in-/de creased.
- Inclusive sourcing:
 - Consider all sustainable materials, including pre-consumer waste, workshop waste, material from chemical recycling, with a market-driven approach.
- Promote market dynamics:
 - Avoid any closed-loop targets; let the market determine effective recycling strategies.
- Ensure technology neutrality:
 - Adopt a technology-neutral approach to encourage innovation and competition in recycling industry.

TAKE INTO ACCOUNT MARKET DYNAMICS

- Dismantling:
 - Empower dismantlers and waste operators to make market-driven decisions that reflect actual demand.
- Feasibility and proportionality:
 - Evaluating the technical viability and proportionality of removal obligations to ensure they are practical and achievable.
- Environmental and regulatory balance:
 - Striking a balance between regulatory measures and other strategies to effectively achieve circular economy objectives.
 - Advocating for caution against overregulation, ensuring that any regulatory measures are backed by clear, demonstrable environmental benefits.

BALANCED EPR

- ELVs are valuable, unlike other consumer products, and their recycling is profitable.
- Efficient working of waste management operators should be encouraged.
- Producers can't verify waste operators' profit claims, risking financial inconsistencies.
- Only contracted operators may claim compensation for deficits.
- Producers should have the right to define and organize their collection system, rejecting non-free-market approaches.
- Financial fee modulation criteria need reevaluation as many criteria are not feasible or representative.

NOFAS (NO ONE FITS ALL SOLUTION) PRINCIPLE

- Vehicles are complex products, requiring their own sector-specific regulation.
- Different vehicle categories (L, M, N, O) have unique priorities and require specific requirements for their own specific challenges:
 - The ELVR must recognize the unique traits/complexities of the automotive sector.
 - It must set clear objectives for the automotive industry to promote sustainability.
 - Priorities should reflect long-term industry needs, not only the current political agenda.

THANK YOU!



REPRESENTS EUROPE'S 16 MAJOR CAR, VAN, TRUCK AND BUS MANUFACTURERS

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