

# End-of-Life Vehicle Regulation

Towards a circular automotive future

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# Introduction

## About CLEPA

CLEPA, the European Association of Automotive Suppliers, represents over 3,000 companies supplying state-of-the-art components and innovative technologies for safe, smart, and sustainable mobility.

CLEPA brings together over 120 global suppliers of car parts, systems, and modules and more than 20 national trade associations and European sector associations. CLEPA is the voice of the EU automotive supplier industry linking the sector to policy makers.



The automotive sector accounts for **30% of R&D** in the EU, making it the number one investor.



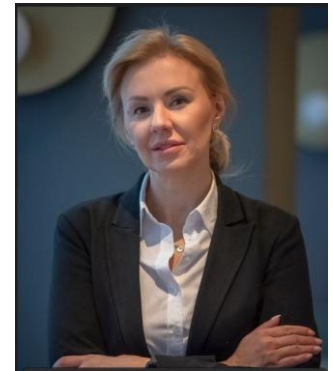
European automotive suppliers invest over **30 billion euros** yearly in research and development.



Automotive suppliers register over **39,000 new patents** each year.



Automotive suppliers in Europe generate **1.7 million** direct jobs.



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# Executive Summary

The proposed End-of-Life Vehicle Regulation (ELVR) is poised to become a key piece of legislation for the automotive supply industry, serving as an important lever for a more circular economy, contributing towards decarbonization efforts. The proposal reflects the European Commission's goal of promoting circularity in the sector through stricter design targets, increased use of recycled materials, improved and standardized product information, and prolonging the lifecycle of products and materials. Establishing legal requirements for a circular automotive economy and increasing harmonization across member states represents a positive step towards achieving the EU's sustainability ambitions



CLEPA supports the Commission's intention to broaden the scope of the ELVR proposal beyond its current focus on waste management, transitioning towards a more comprehensive circular policy that acknowledges the important role of lifetime maximization strategies, including repair, reuse, remanufacturing and refurbishment, as well as the use of more recycled and sustainable materials.



Recommend clarifying certain drafted articles to provide businesses with certainty and ensure seamless implementation of the legislation.



Furthermore, it will be crucial for the industry to achieve alignment between applicable policies, such as the **Critical Raw Materials Act (CRMA), Batteries**



**Regulation, Waste Framework Directive, and other environmental and chemicals legislation.**

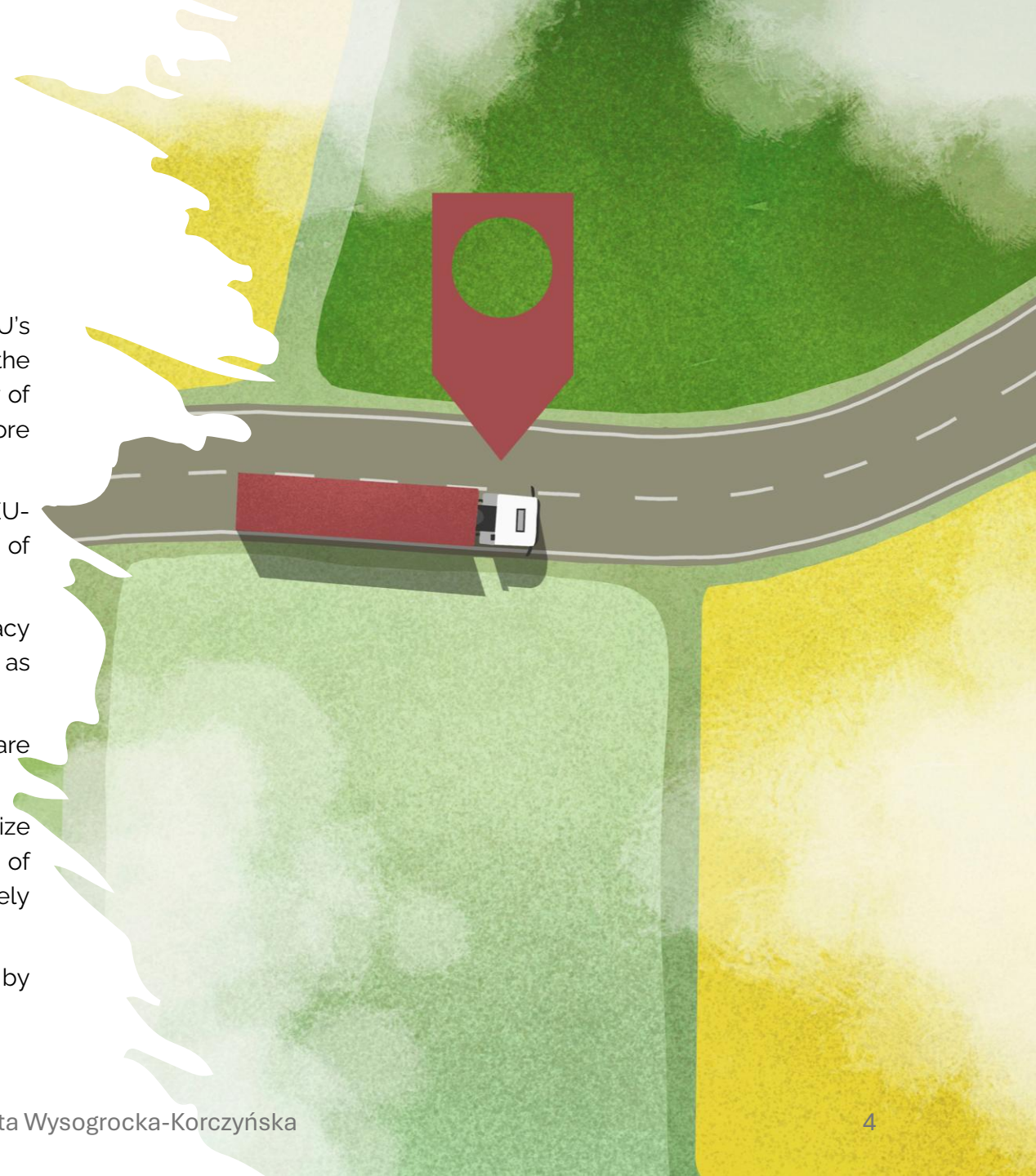


This document outlines CLEPA's priorities and recommendations for the proposal currently under discussion within the European institutions:



# Key Priorities

- Technology-neutral recycled content targets: Achievable and aligned with the EU's decarbonization goals, these targets are an effective circularity measure. To ensure the production of newly type-approved vehicles, the Commission should assess the availability of recycled plastics after the adoption of the Regulation to determine the necessity of a more flexible approach to the origin of secondary plastic feedstock.
- Harmonized calculation methodology for recycled content: We urgently call for EU-harmonized rules for calculating and verifying chemically recycled content using chain of custody (e.g. mass balance approach).
- Addressing legacy substances: ELVR must tackle the issue of accumulated legacy substances, aligning with other relevant automotive substance legislation ("repaired as produced")
- Streamlined information requirements: Clear reporting thresholds and requirements are essential for effective compliance (e.g. VIN number)
- Acknowledging the role of remanufacturing: The regulation should better recognize remanufacturing and its operators. We recommend adopting the industry-agreed definition of "Remanufacturing" and defining the different activities during the treatment process separately in Article 3.
- Removal of parts for reuse or remanufacturing: This process should remain driven by market demand and ecological feasibility.



# Recommendations

**Technology-neutral recycled content targets improve automotive circularity if they are feasible and aligned with the EU's decarbonisation goals.** Automotive suppliers continuously aim to increase the use of more sustainable materials (e.g., recycled or bio-based plastics) in their products.

Definition of plastics in Article 3(g) based on REACH fails to include several polymer types commonly used in vehicles. CLEPA acknowledges the importance of extending the scope of the plastics definition to include not only thermoplastics but also thermosets, elastomers and polyurethane foams, as suggested in the JRC report.

Secondly, **we strongly recommend considering all waste streams as a source counting towards the proposed recycled plastic content targets in Article 6.** Focusing solely on post-consumer plastic would significantly limit the available feedstock for producing recycled plastics. This concern is equally applicable to the closed-loop requirement for recycled content. Instead of only counting plastics recovered from end-of-life vehicles towards the closed-loop targets as stated in the current proposal, plastics recovered from parts and components removed from vehicles during their use-phase should also count towards closed-loop targets.

**CLEPA also calls for an assessment of the availability of recycled plastics by the Commission after the adoption of the Regulation, according to Article 6 paragraph 2.** The assessment should examine feedstock availability for the closed-loop targets, including the existing and forecasted availability of plastics recovered from waste, in view of technical and scientific progress. This assessment shall decide upon new measures for the production of new vehicles with an appropriate share of recycled plastics. Increasing the availability of feedstock will require efforts from all stakeholders, including policymakers, recyclers, collectors and end-market users. It is also strongly linked to the capacity of recycling technologies.

Chemical recycling allows the production of high-quality recycled plastics for safety, regulatory and performance reasons. For this technology to succeed and deliver at scale, **EU-harmonized rules are urgently needed for calculating and verifying chemically recycled content using chain of custody (e.g., mass balance approach).** CLEPA supports a technology-neutral approach towards recycling technologies to achieve climate neutrality and ensure a circular economy. We encourage continued collective efforts in all processes that aim to reduce CO<sub>2</sub> emissions. An additional concern regards the lack of a common calculation methodology for recycled content.

**Strongly support the need for a harmonized calculation methodology for recycled content. The inclusion of a minimum threshold should also be defined for any declaration requirement.**

**The issue of accumulated legacy substances must also be addressed in ELVR and any other relevant automotive substance legislation.** Automotive components rely on several thousands of chemicals and substances to ensure the highest quality and performance of products. Nevertheless, the use of restricted substances is avoided and reduced to the maximum extent possible in any automotive component. It is also common practice in the automotive supply chain to report the presence, if any, of restricted substances in their products, following article 33 of the REACH Regulation.



# *A streamlined approach to labelling and information requirements is needed*

- Regarding the minimum information on the label (Annex VII Part D 2) limited to the purpose of direct reuse, the processes of remanufacturing and refurbishment do not require information such as the description of the original component, the vehicle identification number or information on the dismantling company.
- Current established processes in sorting and selection centres effectively work without the link to the original part and vehicle. Therefore, we recommend changing Annex VII Part D (2) to "Minimum information to be provided in the labelling of the parts placed on the market for direct reuse." Additionally, we welcome guidance on the labelling of remanufactured parts for trade in the market. CLEPA recommends as minimum information the name or trademark of the remanufacturer and the information that the part is remanufactured.
- For the specific case of permanent magnets, provisions for labelling requirements and further access to product information permanent magnets should avoid deviations between the ELVR text and CRMA.
- More importantly, we see it as crucial that the ELVR takes precedence over CRMA (COM(2023) 160).

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# *The role of remanufacturing and its operators should be acknowledged*

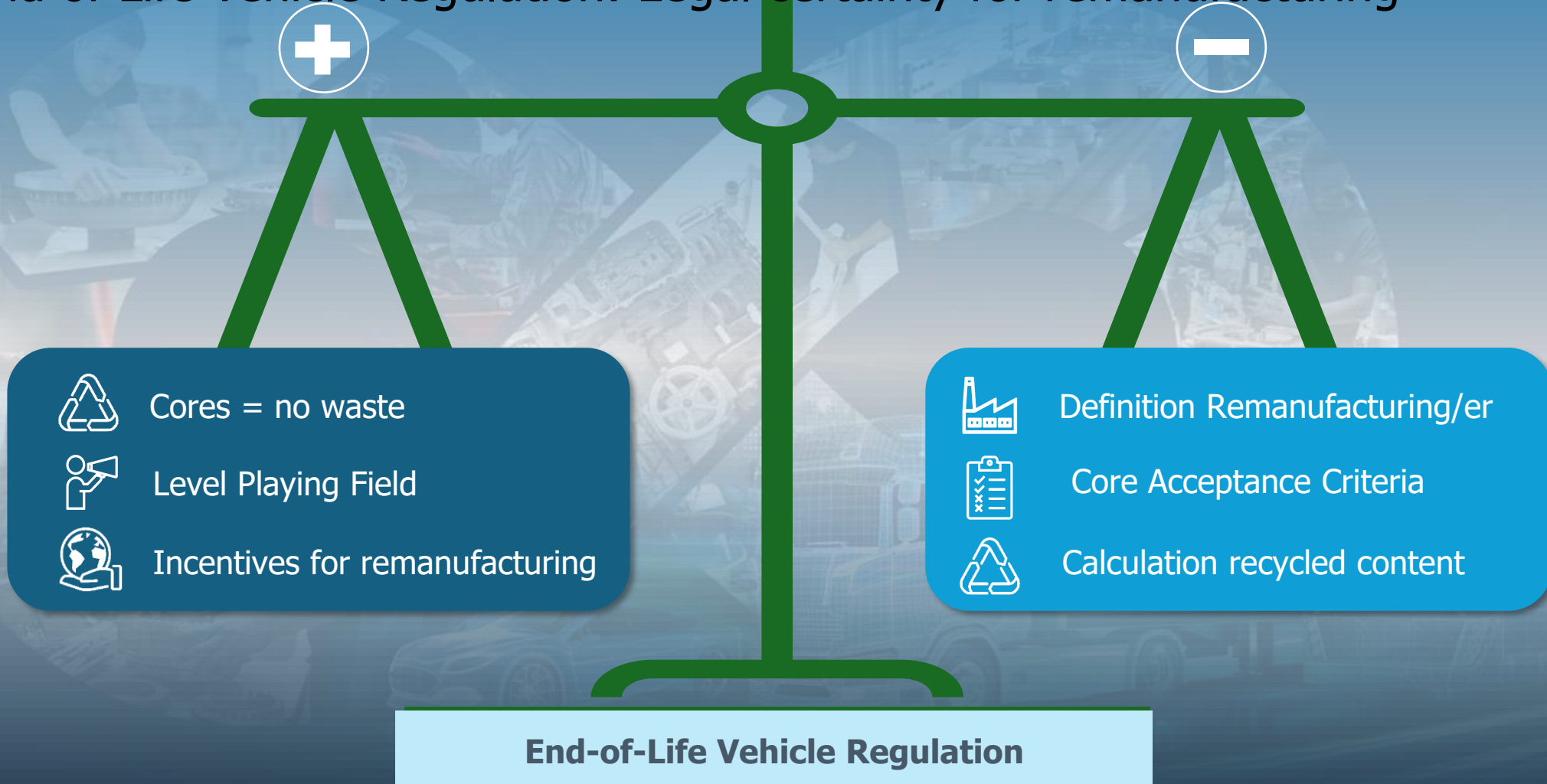
- It is positive that the text introduces a definition of remanufacturing and clearly states that parts for remanufacturing (cores) or reuse should not be considered waste (Article 31). Unfortunately, the important role of remanufacturers is not fully acknowledged in the proposal (e.g., in relation to handling removed cores) and instead favors waste management operators. The consequence would be that remanufacturers and other economic operators, such as dismantlers, could be expected to either obtain a waste management license or be excluded from the process.
- The regulation should better reflect the actual remanufacturing process, in the definitions but also throughout the text, shifting the focus from waste operators to a broader set of players, from dismantlers, repair and maintenance operators to remanufacturers.
- CLEPA wishes to highlight that there is an industry-agreed definition of "Remanufacturing" which we strongly advise to be used for the purpose of this regulation.
- A new definition of "core" must be added, as it is a specific terminology used broadly by the automotive aftermarket.
- The different activities during the treatment process must also be defined separately and included in Article 3: "remanufacturers", "waste management operators", "authorised dismantler" and "repair and maintenance operator."
- Additionally, all activities mentioned in the Regulation should be clearly defined in Article 3, including depollution, dismantling, compacting, shearing, shredding, and recovery or preparation for disposal





# Update on Focus 1 Topics – Deep Dive

## End of Life Vehicle Regulation: Legal certainty for remanufacturing





# Outreach and Update

## Draft End of Life Vehicles Regulation – Draft Report EP

### Amendment 32

#### Proposal for a regulation Recital 56

##### *Text proposed by the Commission*

(56) Once the authorised treatment facilities have removed parts and components from an end-of-life vehicle, they should carefully assess and determine whether those parts and components are fit for reuse, remanufacturing or refurbishment, **based on objective criteria linked to the technical features of the parts and components and requirements on vehicle safety**.

##### *Amendment*

(56) Once the authorised treatment facilities have removed parts and components from an end-of-life vehicle, they should carefully assess and determine whether those **parts and components** are fit for reuse **or can be used as core or for remanufacturing or refurbishment. Such cores should contain most of the relevant parts, while the absence of minor components such as screws should be disregarded.**

### Amendment 63

#### Proposal for a regulation Article 3 – paragraph 1 – point 35 d (new)

##### *Text proposed by the Commission*

##### *Amendment*

(35d) **‘core product or part’ or ‘core’ means a previously sold, worn or non-functional (used) product or part, intended for the remanufacturing process; during reverse logistics, a core is protected, handled and identified for remanufacturing to avoid damage and to preserve its value; a core is not waste or scrap and is not intended to be reused before remanufacturing and is removed from vehicles either during their lifetime or at end-of-life;**

### Amendment 34

#### Proposal for a regulation Recital 58

##### *Text proposed by the Commission*

(58) Recognising the potential of remanufacturing and refurbishment in the automotive sector, and their contribution towards circular economy, it is necessary to provide legal clarity to the economic operators involved in this sector. It should therefore be clarified that **parts and components** removed from an end-of-life vehicle, which are suitable for reuse, remanufacturing or refurbishment, should not be considered waste. This is necessary to facilitate the shipment, transportation or any other transfer of such **parts and components**. The relevant national authorities should be in position to request documentation, from the authorised treatment facility that removed the **part or component** concerned, that confirms, via a dedicated assessment, the technical suitability of the relevant **parts and components** for remanufacturing, refurbishment or reuse.

##### *Amendment*

(58) Recognising the potential of remanufacturing and refurbishment in the automotive sector, and their contribution towards circular economy, it is necessary to provide legal clarity to the economic operators involved in this sector. It should therefore be clarified that **cores during the use phase of vehicles or in their end of life**, removed from an end-of-life vehicle, which are suitable for reuse, remanufacturing or refurbishment, should not be considered waste. This is necessary to facilitate the shipment, transportation or any other transfer of such **cores**. The relevant national authorities should be in position to request documentation, from the authorised treatment facility **or other authorised economic operator** that removed the **cores** concerned, that confirms, via a dedicated assessment, the technical suitability of the relevant **cores** for remanufacturing, refurbishment or reuse.

### Amendment 156

#### Proposal for a regulation Article 31 – paragraph 1 – subparagraph 2

##### *Text proposed by the Commission*

The **parts and components** that are fit for reuse, remanufacturing or refurbishment shall not be considered waste.

##### *Amendment*

The **cores** that are fit for reuse, remanufacturing or refurbishment shall not be considered waste.

# Draft End of Life Vehicles Regulation - Definition Remanufacturing (AM 542-549) important points included from all political groups

## Amendment 57

Proposal for a regulation  
Article 3 – paragraph 1 – point 28

*Text proposed by the Commission*

(28) ‘remanufacturing’ means **an** operation in which a new part or component is manufactured from parts and components that are either removed from vehicles or end-of-life vehicles and in which at least one change is made to the part or component that affects its safety, performance, purpose or type;

*Amendment*

(28) ‘remanufacturing’ means **a standardised** operation in which a new part or component is manufactured from parts and components that are either removed from vehicles or end-of-life vehicles and in which at least one change is made to the part or component that affects its safety, performance, purpose or type; **the process is in line with specific technical specifications, including engineering, quality and testing standards, and yields fully warranted products;**

## Amendment 543 Pietro Fiocchi

Proposal for a regulation  
Article 3 – paragraph 1 – point 28

*Text proposed by the Commission*

(28) ‘remanufacturing’ means **an operation in which a new part or component is manufactured from parts and components that are either removed from vehicles or end-of-life vehicles and in which at least one change is made to the part or component that affects its safety, performance, purpose or type.**

*Amendment*

(28) ‘remanufacturing’ means **a standardized and documented industrial process that can fulfil the requirements established by the manufacturers, by which used products or parts are returned to same-as-new, or better condition and performance. The process is in line with specific technical specifications, including engineering, quality and testing standards. The process yields fully warranted products;**

## Amendment 542

Pierfrancesco Maran, Matteo Ricci, Bruno Tobback, Elisabeth Grossmann, Annalisa Corrado

Proposal for a regulation  
Article 3 – paragraph 1 – point 28

*Text proposed by the Commission*

(28) ‘remanufacturing’ means **an** operation **in which a new part or component is manufactured from** parts and components that are either removed from vehicles or end-of-life vehicles **and** in which **at least one change is made to the part or component that affects its safety,** performance, purpose or type;

*Amendment*

(28) ‘remanufacturing’ means **any technical** operation **on** parts and components that are either removed from vehicles or end-of-life vehicles in which **a** part or component **is manufactured to return to same-as-new, or better, condition and** performance **and result being used for the same** purpose or application as the one for which they were originally designed;

## Amendment 547

Pascal Canfin, Yvan Verougstraete, Sandro Gozi, Ivars Ijabs, Andreas Glück

Proposal for a regulation  
Article 3 – paragraph 1 – point 28

*Text proposed by the Commission*

(28) ‘remanufacturing’ means **an** operation in which **a new part or component is manufactured from parts and components** that are either removed from vehicles or end-of-life vehicles **and in which at least one change is made to the part or component that affects its safety,** performance, **purpose or type.**

*Amendment*

(28) ‘remanufacturing’ means **a standardised** operation in which **cores** that are either removed from vehicles or end-of-life vehicles **are returned to same-as-new, or better, condition and** performance **The process is in line with specific technical specifications, including engineering, quality and testing standards. The process yields fully warranted products;**

# Outreach and Update

## Draft End of Life Vehicles Regulation - Amendments EP

Amendment 10 – Reuse, remanufacturing and refurbishment of parts and components Annex VII, Treatment requirements, Part D, 1(b)	
European Commission proposal	Amendment
(b) For remanufacturing or refurbishment: (i) the part or component is complete; (ii) an assessment of damage, reduced functionality or performance and repairs needed for restoring the part or component to a state where it is fit to be used; (iii) there is no heavy corrosion	(b) For remanufacturing or refurbishment: (i) the part or component <b>shall contain all relevant parts</b> <del>is complete</del> ; (ii) an assessment of damage, reduced functionality or performance and repairs needed for restoring the part or component to a state where it is <b>potentially fit to be remanufactured</b> <del>used</del> ; <del>(iii) there is no heavy corrosion</del>

**CLEPA amendment supported by EPP, ECR, Renew**  
  
(i) AM 1875 (EPP), 1876 (ECR), 1877 (Renew)  
(ii) AM 1978 ECR, 1979 (EPP) 1880 (Renew)  
(iii) 1881 (Renew), 1882 (ECR), 1883 (EPP)



# Outreach and Update

## Draft End of Life Vehicles Regulation - Amendments EP

Amendment 11 – Reuse, remanufacturing and refurbishment of parts and components Annex VII Part D, 2	
European Commission proposal	Amendment
Minimum information to be provided in the labelling of the parts and components: (a) name of the component or part; (b) reference to the vehicle identification number (VIN) of the vehicle from which the component or part has been removed; and (c) name, the postal address, indicating a single contact point and e-mail address, a web-address, if applicable, identifying the operator that removed the component or part.	Minimum information to be provided in the labelling of the parts placed on the market for direct reuse: (a) name of the component or part;{ <del>(b) reference to the vehicle identification number (VIN) of the vehicle from which the component or part has been removed; and</del> (c) (b) name, the postal address <b>of dealer (or workshop)</b> , indicating a single contact point and e-mail address, a web-address, <b>on the part label or on the packaging for parts sold in bulks</b> , if applicable, identifying the operator that removed the component or part.

**CLEPA amendment supported by EPP, ECR, Renew**

VIN Number deletion by Renew, ECR, EPP

