



# **EGARA position on the Circular Vehicle Regulation**

**FORS Conference Warsaw**  
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# In this presentation

**The obligations of the new Regulation ask for performance and collaboration of both ATF and OEM for a circular result**

- **What is EGARA**
- **Henk Jan Nix**
- **Role ATFs**
- **Parts and materials**
- **Enforcement**
- **Cartel**
- **PRO**



# **European Group of Automotive Recycling Associations**

**Since 1991**

- **Denmark, Norway, Sweden, Finland, UK, France, Poland, The Netherlands, Estonia, Switzerland, Spain, Italy, Greece, Belgium**
  - **Independent dismantler associations**
    - **Level playingfield**
  - **Lobby at governments, EC, stakeholders etc.**
  - **Exchange knowledge experience and best examples**





# **Henk Jan Nix**

**Stiba policy advisor since 1998**

**Environmental/legal affaires, vehicle  
registration, insurance issues, customer  
complaints**

**EGARA general secretary since 2007**



# A picture of an EELV







# **ATFs have a prominent role in the new Regulation**

- We collect and accept ELVs and reregister them (COD);**
- We take the ELV in as hazardous waste and we do the depollution as first activity, by separating hazardous waste from the ELV;**
- We remove materials for material reuse and recycling;**
- We sell parts for reuse;**
- We even sell parts as core for remanufacturing;**
- Dismantling of trucks and motorcycles are specialisms that already happen**



# Conditions

- **No parts may be excluded for sales**
- **Removal of unprofitable materials need to be compensated**
- **We need good info about materials and parts**
- **We need complete ELVs and EELVs**
- **We need protection against illegals (unfair competition/level playingfield)**
- **We may not be excluded from collective or individual systems**
- **-> much is already dictated in the Proposal, but how will it be practised?**





# Parts reuse







# About Parts

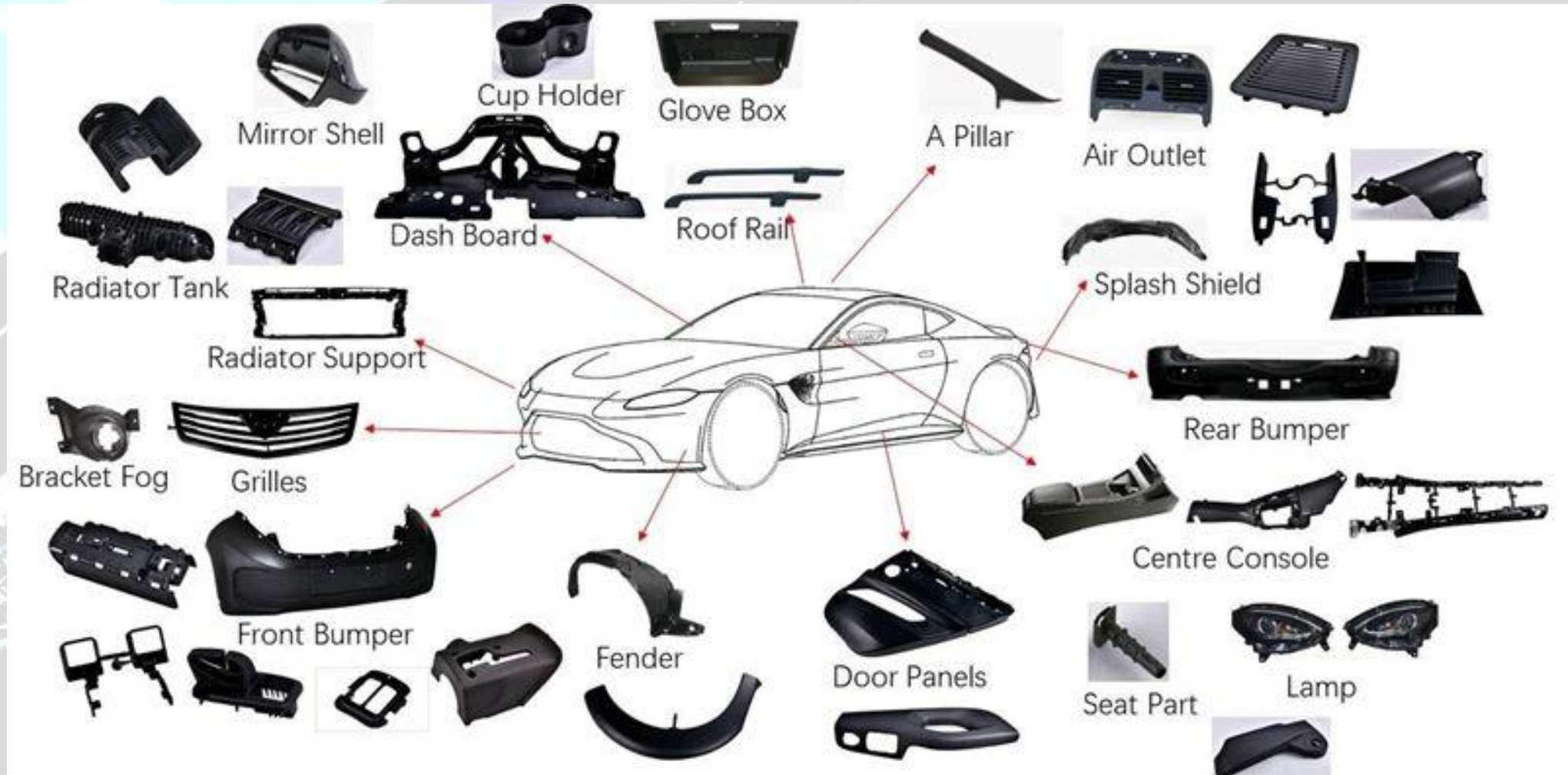
- **We need OEM info and parts should not be digitally locked**
- **We should be allowed to sell any part for which a market exists**
- **Parts should not be cherrypicked by other operators (complete ELVs)**
- **We do the assessment of parts**
- **Warranty is often already a year**
- **Used parts save a lot of CO2: up to 80%**
- **Used parts enlarge the footprint of existing cars**







# Materials in a vehicle 2





# Materials in a vehicle 3



- Steel sheet (hotformed)
- Steel sheet (coldformed)
- Aluminium sheet
- Aluminium Extrusion profile
- Cast aluminium





# About materials

- **In many cases material removal is already done on a commercial base: there's a market**
- **Material removal is getting more complex: info is necessary**
- **It's expected that the new Regulation will prescribe more material removal**
- **Will recycled content create a new market?**
- **Material removal needs to be compensated in case there's no market**



# Enforcement

- **We need a level playingfield**
- **We cannot protect ourselves against unfair competition**
- **Our legal status has high costs**
- **We have to leave enforcement to the authorities**
- **Visit of ATFs every 10 years is not sufficient**
- **Illegals need to be visited: focus on dismantling as (illegal) activity rather than on ATF**





# New obligations





# About new obligations

- **A vehicle has to be circular;**
- **Recycled content targets means new obligations for producers;**
- **ATFs are equipped to produce a flow of clean recyclable mono streams;**
- **ATFs can do this for the lowest costs;**
- **ATFs do this efficiently (separation at the source and organised to create volume);**
- **ATFs can do the job as long as no techniques do a better job;**
- **We will be happy to coöperate with the OEMs.**





# Cartel

- **We were interviewed by Antitrust 3 years ago**
- **We knew the OEM position about the value of an ELV**
- **We were disappointed about the cartel**
- **We have always been cooperative in meeting the goals and offered our services to help achieve them**
- **In some countries systems that compensate already exist**
- **We also know that OEMs behave differently in every country**
- **EGARA is not planning on claims**
- **We do not rule out claims. Any member can choose for himself as any situation is different**



# PRO systems

- **Producer Responsibility Organisations should take care of compensation among other obligations**
- **There's a choice to set up individual or collective systems**
- **Not much is said about conditions to join either system**
- **No high thresholds**
- **Objective conditions**
- **The OEM should not choose participants, all that fulfill the conditions should be able to join: No ATF excluded**
- **Individual systems mean more administrative burden**
- **Will individual systems mean restriction in acceptance of ELVs?**





# Conclusions

- **In all, we think the proposal is a good update from the ELV Directive and a good attempt to circularity**
- **ATFs are ready for the new obligations, but there are conditions**
- **We would like to see some changes in the proposal**
- **Not all is clear, yet**
- **We see the EC is very serious**



# Thank you

[www.egaranet.org](http://www.egaranet.org)