



# **The Revision of the ELV Directive – A recyclers' perspective**

Emmanuel KATRAKIS, Secretary General



# EURIC AT A GLANCE

The European Recycling Industries' Confederation  
brings together recycling federations from 20 EU and EFTA Member States  
and represents:

5,500+ companies including small and medium-sized enterprises

300,000 local jobs

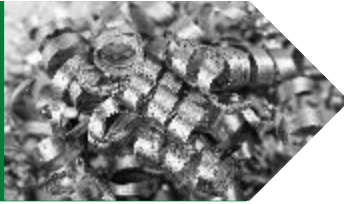
Millions of tons of waste recycling every year (metals, paper,  
plastics, glass etc.)

An annual turnover of about €95 billion



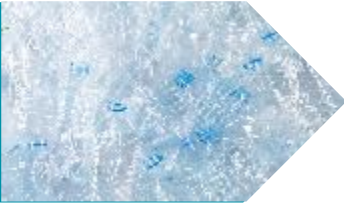
# STREAMS COVERED

Ferrous and non ferrous metals  
(e.g., steel, aluminium, copper, etc.)



Tyres

Plastics (e.g., packaging, construction,  
engineering plastics, etc.)



End of life vehicles

Paper



Electrical and electronic waste

Textiles



Batteries recovery & fire prevention



# EuRIC IN EU & INTERNATIONAL BODIES

Platform on Sustainable Finance (Member)

Coordination Group of the Circular Economy Stakeholder Platform (Member)

EIP on raw materials - Steering Committee & Sherpa

Support to Circular Economy Financing Expert Group of the European Commission (In charge of the sub-working group on incentives for the circular economy)

Circular Plastics Alliance of the European Commission (Thematic coordinator for ELV Plastics)

CEN / CENELEC (WEEE, ErP, Paper, Plastics, Tyres, Strategic Advisory Body on Environment – Circular Economy, Etc.)

Ecodesign and Energy Labelling Consultation (EELCF) (Member)

Member of Competent Authorities for REACH & CLP (CARACAL) (Type C Member)

Accredited stakeholder of ECHA (European Chemicals Agency)

Market Access Advisory Committee (MAAC)

JRC / IPPC Bureau (TWG)

Observer of UN Basel & Stockholm Conventions

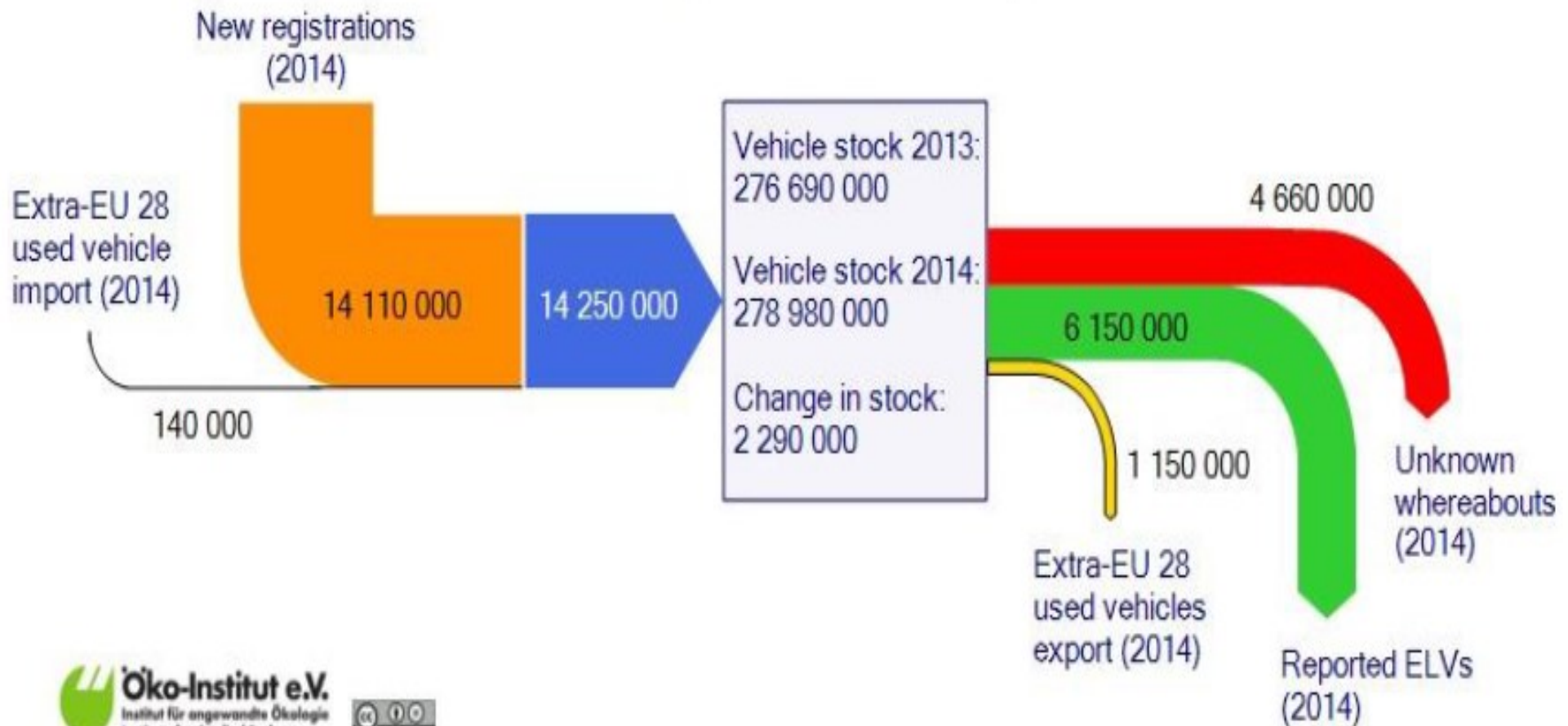
Regular expert/speaker at TAIEX, Circular Economy Mission, High Level Conferences of G7 & G20 Environment / COP

OECD (BIAC)

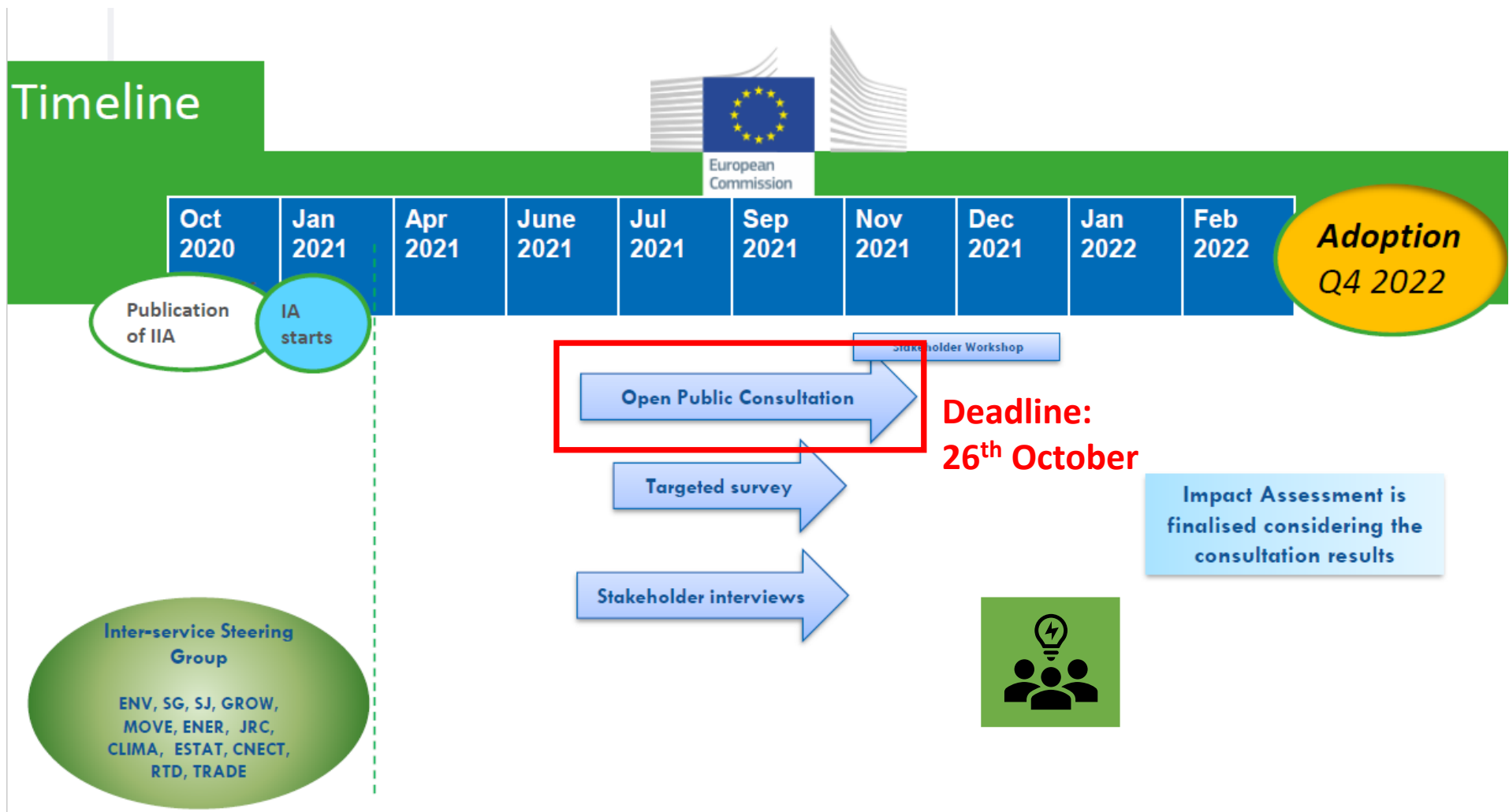


## ELVs “unknown whereabouts” (2017)

**Figure 1-1: EU-28 balance for registration of new and import of used vehicles, the change in the vehicle stock and the whereabouts of the vehicles**



# End-of-Life Vehicle (ELV) Directive revision timeline



## Option 1: Baseline Scenario

- Reinforcing the implementation of the **ELV Directive** without legislative changes
- Guidelines, FAQ, exchange between MS, implementing/delegated acts

## Option 2: Targeted modification of the ELV Directive to boost recycling and reuse

- Better **align with EU waste legislation** (clearer definition of recycling)
- Reduce number of “**missing vehicles**” through new enforcement measures
- **Targets:** new, more ambitious targets for reuse and recycling, per materials such as plastics, and promotion of remanufacturing
- Set **fully-fledged Extended Producers’ Responsibility system** for the financing of recycling/reuse of all materials
- Facilitate **access of dismantlers to information** on parts and materials used in cars
- Better harmonisation of **reporting** across the EU Member States

**Option 3 : A Regulation based on a life-cycle approach to set the automotive sector on a circular path**

**Option 2 + more changes such as:**

Merge the **ELV Directive and Directive 2005/64/EC** on the type-approval of motor vehicles with regard to reusability, recyclability and recoverability of a vehicle into a **single instrument covering the whole life cycle of vehicles**

**Extend the scope** of the ELV Directive to new vehicles (trucks, motorcycles)

**Improve design of vehicles** – closing the loop between the vehicle production & ELV treatment

**Set up mandatory target(s)** for a minimum content of recycled plastics in new cars

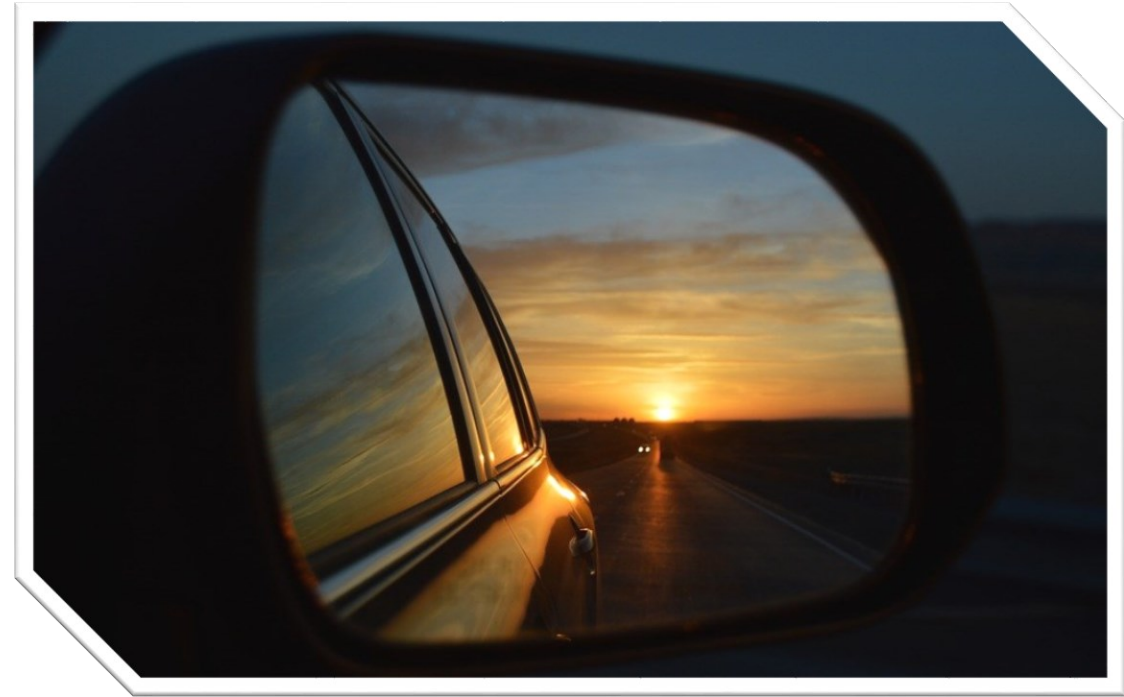
**“Missing vehicles”:** Restrict export of polluting used vehicles outside the EU and mandatory exchange of information on registration of vehicles in the EU MS



# Why revising the ELVD matters

## Taking a step back – ELV Directive 2000/53/EC

- Scale up recycling capacity in EU
- Supported innovation to achieve high recycling rates
- Lack of harmonization/enforcement
  - unfair competition for ATFs
- Room to close materials' loops especially for plastics



## Looking forward – Revised ELV Directive

- Align the ELVD with the objectives set by the Green Deal & new CEAP
- Level the playing field for the ELV recycling industry by tackling loopholes
  - Vital to innovation & competitiveness
- Better cooperation across Member States

# ELVD Revision – Recyclers' priorities

## 1. Tackling loopholes / Fixing inconsistencies across Member States (> 4M ELVs unknown whereabouts / year)



- Harmonized registration and de-registrations systems across Member States
- **Strengthening** of the implementation/enforcement of the **certificate of destruction** (CoD) through **well-framed financial incentives** for the last holder to deliver a vehicle to ATF in exchange of a CoD
- **Clear & “easy way to implement”** the distinction between used cars and ELVs, such as those recently introduced by **Italy** based on a roadworthiness test, to tackle illegal exports of ELVs
- **Stronger involvement of insurers to support the proper implementation of the ELV Directive**
- **Appropriate recognition of the key role played by ELV recyclers supporting the brunt of the costs of recycling ELVs (88% of all EoL costs).**
- **Practical solutions to prevent illegal sales of scavenged spare parts via online platforms**

Essential to level the playing as the ELV recycling sector bear  $\geq 88\%$  of the costs associated with the implementation of the ELVD

## 2. Connecting the dots between design and EoL stage

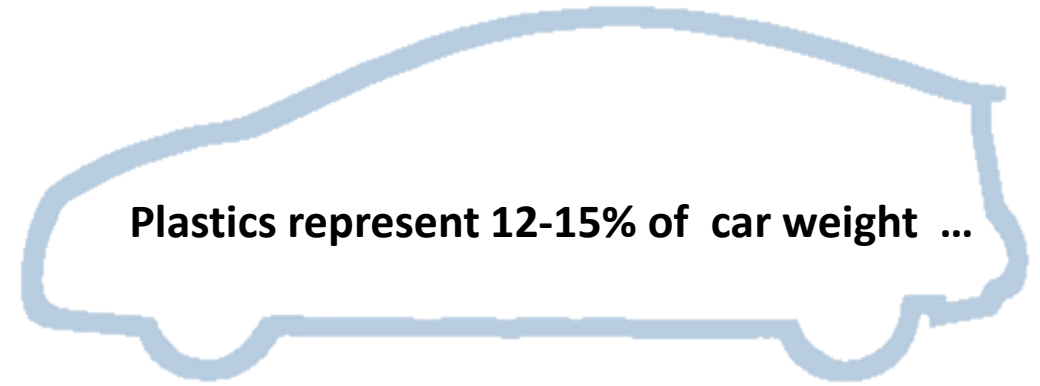
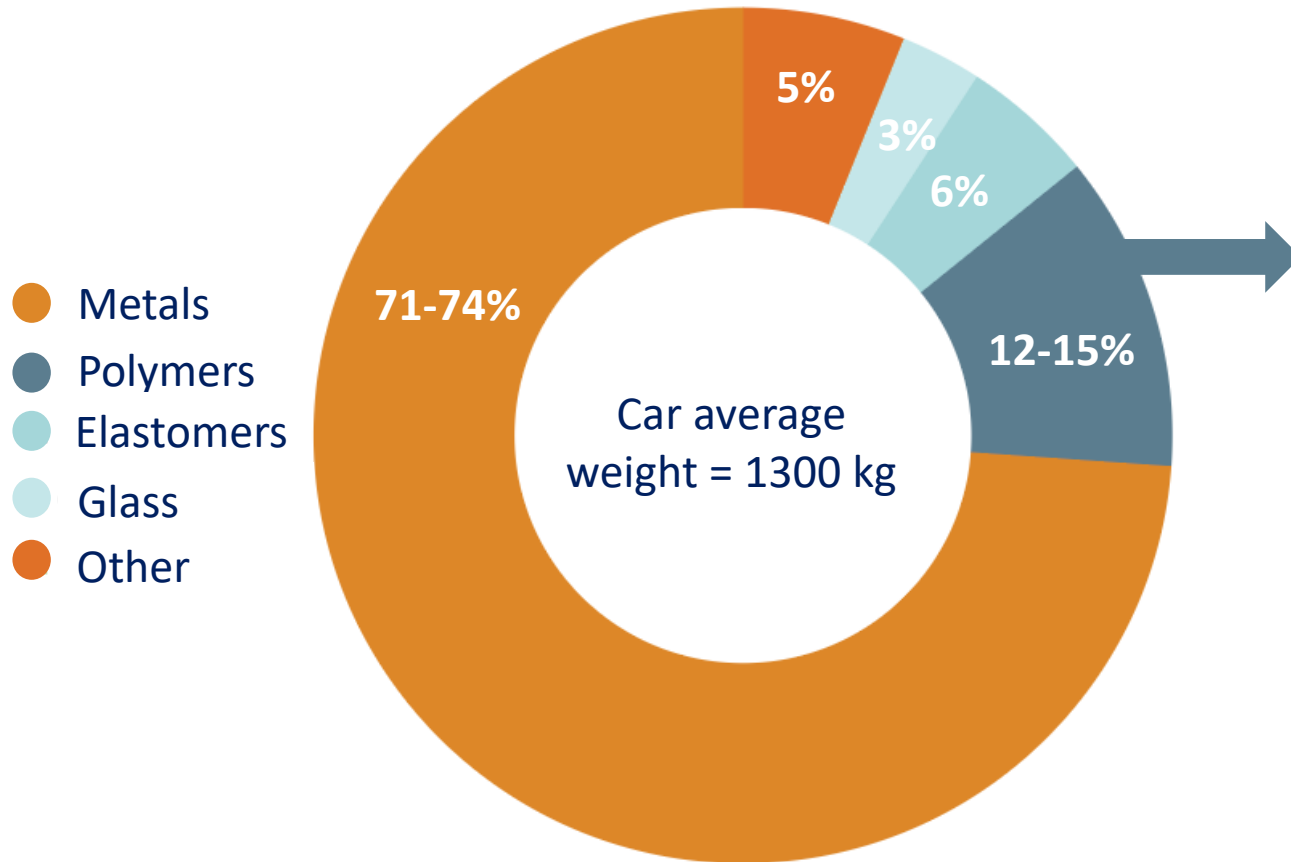
- **Eco-design** of cars for re-use & recycling
- Minimum **target of post-consumer recycled content of plastics** in new cars to foster demand for sustainable polymers



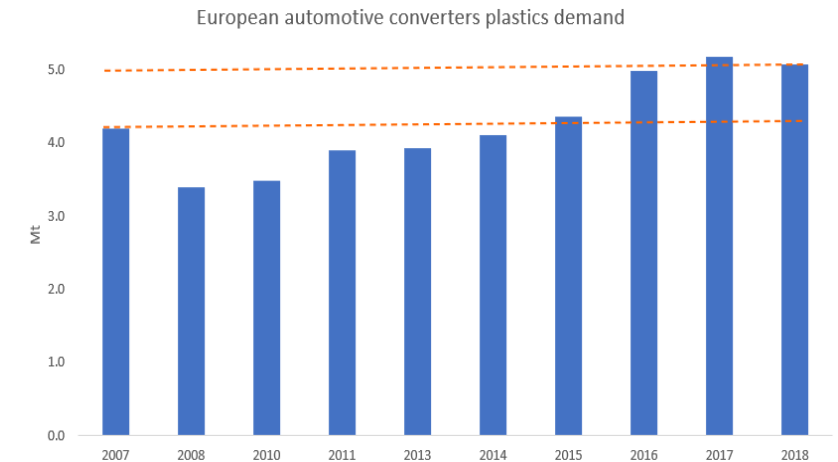
# CALL FOR RECYCLED PLASTIC CONTENT IN CARS

## Plastics in cars

Plastic is the second material in vehicles after metals



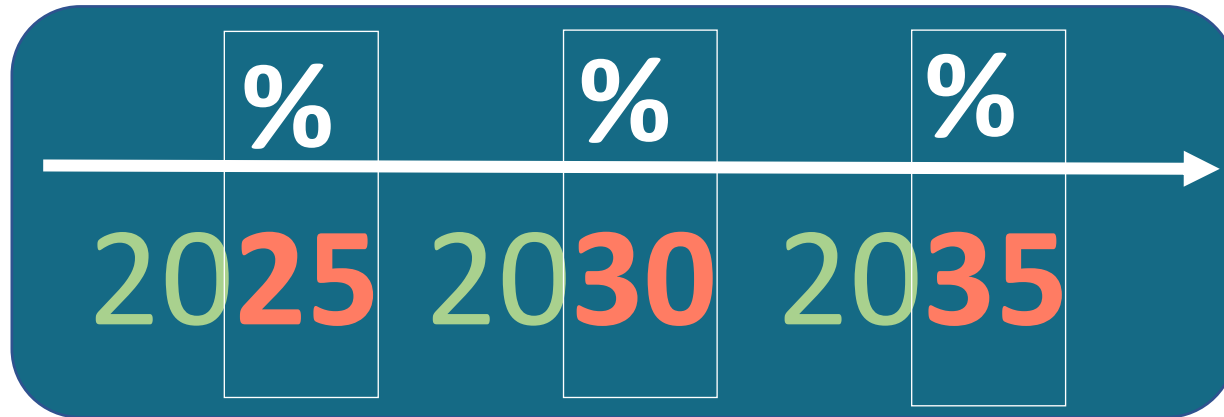
... and their use is increasing



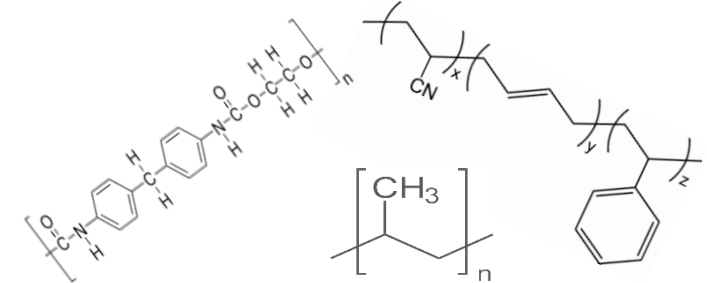
Plastics contribute to car mass reduction  
=  
lower fuel consumption and CO<sub>2</sub> emissions

# RECYCLED PLASTIC CONTENT IN CARS

EuRIC's target for post-consumer recycled content thermoplastics in new cars:



**Eco-design, BP**  
**Incentives**



**Boost circularity and combat global warming as it:**

- Provides the certainty needed by Europe's technical plastics recyclers to invest and scale up capacity in mature technologies

quality recycled plastics for the automotive sector

- Rewards plastics recycling substantial benefits in terms of GHG emissions and energy savings

price valorisation

- Improves design for recycling of plastics in cars and investment into innovative technologies

recycle not yet recycled types of polymers and avoid down-cycling







Thank you for listening!

[euric@euric-aisbl.eu](mailto:euric@euric-aisbl.eu)



## Revision of the ELV and 3R type approval Directives EuRIC: Position Paper

26 October 2021

The European Recycling Industries' Confederation (EuRIC), welcomes the initiation of the Impact Assessment and revision of both Directive 2000/53/EC on End-of-Life Vehicles (ELVs) and of the Directive 2005/64/EC on the type-approval of motor vehicles with regard to their reusability, recyclability, and recoverability (3R type-approval).



EuRIC represents the recycling industry at a European level. Gathering the vast majority of national recycling federations from EU/EEA Member States, the Confederation represents about 5,500+ recycling companies – from market leaders to SMEs – generating an aggregated annual turnover of about 95 billion € by treating various waste streams such as household or industrial & commercial waste including ferrous and non-ferrous metals, end-of-life vehicles (ELVs), electronic waste (WEEE), packaging (paper and plastics), end-of-life tyres or textiles.

EuRIC - via its various branches<sup>1</sup> - represents Authorised Treatment Facilities (ATFs) and the vast majority of ELV recycling facilities (shredders and post-shredder installations) which recycle ELVs in Europe, and producers of plastics, rubber and metal recyclates incorporated into new automotive vehicles/parts. The Confederation therefore has a strong interest in the revision of the ELV and 3R Type-Approval Directives, and call upon the European Commission to ensure the highest level of environmental ambition is achieved as a result of this revision process.

For the recycling industry, several key concerns must be addressed to build upon the success noted within the European Commission's Evaluation report on the state of ELV treatment in the EU.<sup>2</sup> These concerns include: missing-vehicles, the eco-design of new vehicles to allow for future recyclability, recycled content, and free and fair compensation for the implementation of the Circular Economy.

This paper outlines EuRIC's position in regard to the revision process ahead for both Directives, with a focus on key measures to be addressed.

### Key messages

EuRIC recommends the following:



**Missing vehicles** – It is crucial that the large number of vehicles of unknown whereabouts (ca. 4 million) are captured and sent to proper Authorised Treatment Facilities (ATFs), avoiding that ELVs are transferred as used cars outside of the EU. These missing vehicles currently represent significant raw materials lost from the European system and an environmental risk, as these vehicles will not be treated in an environmental sound manner compliant with the ELV Directive. EuRIC suggests proper incentives ranging from financial incentives linked to the Certificates of Destruction (CoD), improved registration systems, or easy systems to make distinctions between used cars and ELVs.



**Design for Circularity** – recyclers have no control over the design or composition of ELVs that end up at ATFs. This power lies in the hands of manufacturers. This has led to several challenges for recyclers, who nonetheless overcame them to achieve the high recycling targets of the ELV Directive. In recent years increases in certain materials create a problematic landscape for the continued high recycling rates (i.e., composite plastics, plastics with certain additives). Difficulties with reuse and recycling at

<sup>1</sup> European Shredder Group (ESG), European Plastics Recycling Branch (EPRB), Mechanical Tyre Recycling branch (MTR), European Ferrous Recovery and Recycling branch (EFR), European non-Ferrous Metal trade and Recycling branch (EUROMETREC).

<sup>2</sup> European Commission (2021) Evaluation of Directive (EC) 2000/53 of 18 September 2000 on end-of-life vehicles.

