

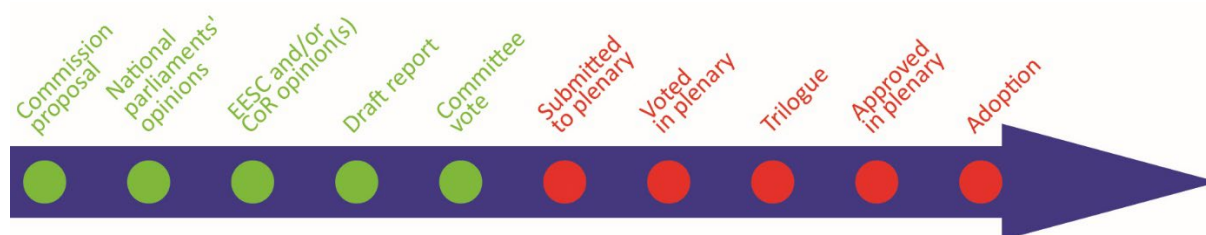
# Circularity requirements for vehicle design and management of end-of-life vehicles

## OVERVIEW

The EU's automotive sector is resource intensive. There are 286 million motor vehicles on the road in the EU, and every year around 6.5 million vehicles become waste. If improperly managed, these vehicles may cause environmental damage and the economy may lose millions of tonnes of materials. In July 2023, the European Commission presented a proposal for a regulation addressing the whole life cycle of vehicles, from design to end-of-life, aimed at improving design and end-of-life management of vehicles for a more resource-efficient automotive sector. It would set circularity requirements on vehicle design and production concerning reusability, recyclability, recoverability and the use of recycled content. It would also lay down requirements on information and labelling of parts, components and materials in vehicles. In addition, the proposed regulation would establish requirements on extended producer responsibility, collection and treatment of end-of-life vehicles, and on the export of used vehicles from the EU to third countries. The proposal is now in the hands of the co-legislators. In the European Parliament, the Committees on the Environment, Climate and Food Safety (ENVI) and Internal Market and Consumer Protection (IMCO) are jointly responsible for the file. The Council adopted its position on 17 June 2025. The joint committee adopted its report on 7 July and the Parliament is expected to adopt its position during the September 2025 plenary session.

**Proposal for a regulation of the European Parliament and of the Council on circularity requirements for vehicle design and on management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2019/1020 and repealing Directives 2000/53/EC and 2005/64/EC**

<i>Committees responsible (Joint Committee procedure - Rule 59):</i>	Environment, Climate and Food Safety (ENVI) and Internal Market and Consumer Protection (IMCO)	COM(2023)451 13.7.2023 2023/0284(COD)
<i>Co-Rapporteurs:</i>	Jens Gieseke (EPP, Germany) Paulius Saudargas (EPP, Lithuania)	Ordinary legislative procedure (COD) (Parliament and Council on equal footing – formerly 'co-decision')
<i>Shadow rapporteurs:</i>	Pierfrancesco Maran (S&D, Italy), Matteo Ricci (S&D, Italy) Filip Turek (Pfe, Czechia), Silvia Sardone (Pfe, Italy) Alexandr Vondra (ECR, Czechia), Piotr Müller (ECR, Poland) Pascal Canfin (Renew, France), Ivars Ijabs (Renew, Latvia) Sara Matthieu (Greens/EFA, Belgium), David Cormand (Greens/EFA, France) Jonas Sjöstedt (The Left, Sweden), Luke Ming Flanagan (The Left, Ireland) Anja Arndt (ESN, Germany)	
<i>Next steps expected:</i>	Plenary vote on mandate for negotiations	



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Members' Research Service  
PE 754.627 – July 2025

## Introduction

The EU automotive sector represents [2.4 million direct jobs](#) (around 13 million jobs in total). In 2023, 14.8 million motor vehicles were manufactured in the EU, while 12.4 million vehicles were registered. In total, there are [285.6 million motor vehicles](#) on the road (Figure 1).

Figure 1 – Vehicles manufactured, registered and on the road in the EU in 2022

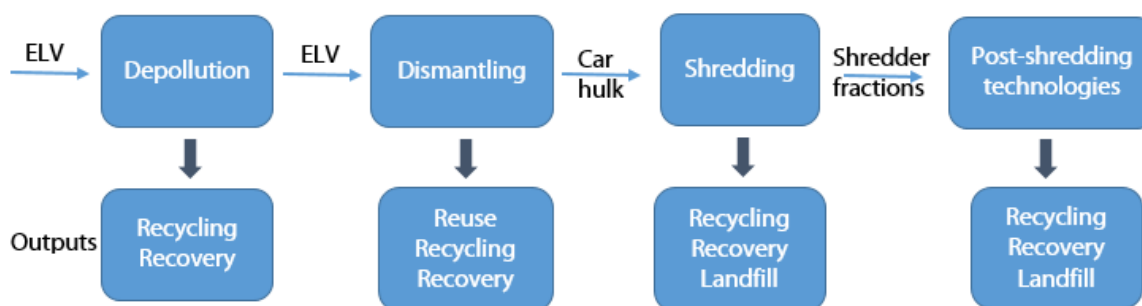
	Cars	Vans	Trucks	Buses	TOTAL
Vehicles manufactured	12 160 492	2 022 201	603 437	28 125	<b>14 814 255</b>
Vehicles registered	10 548 000	1 847 000			<b>12 395 000</b>
Vehicles on the road	248 824 542	30 080 656	5 998 915	679 802	<b>285 583 915</b>

Data source: European Automobile Manufacturers' Association (ACEA), 2025.

Cars and vans are, on average, 12 years old, trucks 14.2 years old and buses 12.7 years old. The average [lifetime of a vehicle](#) ranges between 14 and 20 years. Every year, in Europe, around [6.5 million vehicles](#) are reported as end-of-life (i.e. waste) vehicles.

The EU automotive sector is [resource-intensive](#). Its value chain employs materials derived from over [60 raw materials](#), including critical raw materials (CRMs). The sector consumes around 50 % of the overall EU use of some [CRMs](#). It also represents 19 % of the total consumption of steel in the EU, around 10 % of the total consumption of [plastics](#) and 42 % of the demand for aluminium for all transport equipment. Moreover, the sector represents 65 % of the production of general rubber goods (for tyres, wiper blades or seals).

Figure 2 – Generic scheme of end-of-life vehicle treatment



Source: [Joint Research Centre](#), 2023.

Vehicles reaching their end of life currently are not managed optimally, which results in lost value and pollution. Many of the materials mentioned above, including those with very high supply risks, are not recovered at all or not enough. Only [19 %](#) of the plastic fractions recovered after shredding of end-of-life vehicles are currently sent to recycling. CRMs such as rare earth elements used in electric drive motors are not recovered after shredding (while the current trend towards the electrification of cars entails an increased use of CRMs in vehicles). Moreover, plastic materials are increasingly used in new vehicles because of their lightweight properties. Considerable quantities of plastic waste from end-of-life vehicles are still [sent for incineration or landfilling](#) each year.

Therefore, making the automotive sector more circular is key for the EU to reach the 2050 climate neutrality target, further decarbonising the sector, reducing its dependence on primary raw materials, increasing its resilience and improving the EU strategic autonomy.

[Challenges](#) to the circularity of the automotive sector include the accumulation of chemicals that may have been prohibited since the marketing of the vehicle, the fact that secondary materials must meet the high-quality automotive standards or the lack of reliable data on the life cycle of each component of vehicles. Today, remanufactured parts represent only 5 % of the spare part market in the EU.

The [2019 European Green Deal](#) aims to make the EU economy more resource-efficient and competitive, with no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. Promoting a circular economy model is key to achieving these aims. The [2020 new circular economy action plan](#) announced a number of initiatives along the entire life cycle of products in a number of key value chains (including batteries and vehicles), to speed up the transition towards a more circular economy, reduce the EU's consumption footprint and double its circular material use rate in the coming decade. The action plan announced a revision of the rules on end-of-life vehicles to promote more circular business models, by linking design issues to end-of-life treatment, considering rules on mandatory recycled content for certain materials in components, and improving recycling efficiency.

Building a more circular economy is among the fundamentals for Europe's industrial transformation mentioned in the [2020 EU industrial strategy](#). The mobility-transport-automotive ecosystem is one of the 14 industrial ecosystems that the Commission has been closely monitoring under this strategy. The 2020 [chemicals strategy for sustainability](#) promotes non-toxic material cycles and clean recycling, aiming to ensure that substances of concern in products and recycled materials are minimised. The new [Regulation \(EU\) 2023/1542](#) lays down requirements on sustainability, safety, labelling, marking and information for batteries, and on the collection and treatment of waste batteries. For instance, it sets targets for recycled content in electric vehicle batteries for materials such as lithium and cobalt.

The proposal is complementary to other recent legislative developments designed to transform the automotive industry, such as the recently adopted [Regulation \(EU\) 2023/851](#) setting [stricter CO<sub>2</sub> emission performance standards](#) for new cars and vans (all new vehicles would have zero emission by 2035), the proposed 'Euro 7' regulation setting new standards to reduce pollutant emissions from vehicles and requirements on battery durability, and the [announced revision](#) of the 'roadworthiness package', aimed at adapting the way vehicles are inspected, as vehicles are becoming technically more complex. The proposed regulation also complements the [proposed critical raw materials act](#), as it introduces measures to achieve a higher degree of circularity of the critical raw materials used in vehicles.

## Existing situation

### ELV Directive

The collection and recovery of end-of-life vehicles is regulated by [Directive 2000/53/EC on end-of-life vehicles](#) (ELV Directive). It was adopted in order to minimise the impact of end-of-life vehicles on the environment and to improve the environmental performance of the economic operators involved in the life cycle of vehicles.

The directive sets out provisions on waste prevention, collection and treatment (including depollution) of end-of-life vehicles, and reuse or recovery of components. It restricts the use of some hazardous substances (cadmium, hexavalent chromium, lead and mercury) in vehicles sold after

1 July 2003 (with some possible exemptions). Member States have to ensure that all end-of-life vehicles are stored and treated in accordance with the waste hierarchy.

Under the 2018 update of the EU waste legislation, a review clause (Article 10a) was introduced into the ELV Directive: 'by 31 December 2020, the Commission shall review this Directive, and to that end, shall submit a report to the European Parliament and to the Council, accompanied, if appropriate, by a legislative proposal.'

## '3R Type-approval Directive'

Vehicles put on the EU market are subject to the [type-approval](#) of motor vehicles with regard to their reusability, recyclability and recoverability.

[Directive 2005/64/EC on the type-approval of motor vehicles regarding their reusability, recyclability and recoverability](#) (also known as the '3R Type-approval Directive') is the main piece of EU legislation linking the design of new vehicles and their reusability, recyclability and recoverability. One of its purposes is to ensure coherence between the type-approval procedures for new vehicles and the obligations contained in the ELV Directive. It provides a number of obligations that need to be complied with by the Member States and car manufacturers on how to demonstrate that new models comply with the relevant obligations under EU law on reusability, recyclability and recoverability (new vehicles should be constructed so as to be reused and/or recycled to a minimum of 85 % by mass or reused and/or recovered to a minimum of 95 % by mass).

Both directives apply to cars and vans only (light commercial vehicles with a maximum mass of 3.5 tonnes). Other vehicles (i.e. two- and three- wheel vehicles, trucks, buses and trailers), are not subject to any EU legislation on their eco-design and management at their end-of-life stages.

Neither the 3R Type-approval Directive nor the ELV Directive have been substantially revised since their adoption.

## Parliament's starting position

In its [resolution](#) of 10 February 2021 on the new circular economy action plan, the Parliament expressed its conviction that a circular economy is the way for the EU to remain innovative and competitive in a global market, while decreasing its environmental footprint. It called for circularity approaches in industry, from product design, to sourcing of materials, product reuse and recycling, and waste management. Sustainable, circular, safe and non-toxic products and materials should become the norm in the EU market. It called on the Commission to propose binding product-specific and/or sector-specific targets for recycled content. It also called for economic incentives such as extended producer responsibility with eco-modulation of fees and tax incentives.

The Parliament welcomed the Commission's intention to revise the ELV Directive. It asked the Commission to reflect in its revision proposal the principles of circular economy, such as designing out waste, upgradability, modularity, reparability, reusability, and recyclability of the materials in the highest level of the value. The first priority should be reuse. The Parliament also called on the Commission to ensure effective reuse chains, working with car manufacturers and using extended producer liability schemes. Furthermore, it asked the Commission to improve the quality of reporting on end-of-life vehicles, using a European database, and to make sure that dismantling of cars and reuse of the parts should precede their scrapping and shredding.

## Council and European Council starting position

In its [conclusions](#) on more circularity – transition to a sustainable society, adopted in October 2019, the Council expressed its full support for the Commission's efforts to complement the EU legislative framework and to identify barriers hindering circular economy in Europe. It stressed that sustainable

management of waste and materials was one of the key building blocks of the circular economy, and that more ambitious actions were necessary to lead to a systemic transition in which circular, safe and sustainable climate-neutral production and consumption models become competitive and mainstream.

The Council welcomed action to boost circular economy by using products and materials in a smarter way, by extending the lifetime of products and by keeping materials in the economic cycle for as long as possible ('refuse, reduce, repair, reuse, redesign and recycle'). It asked the Commission to examine the possibilities of using extended producer responsibility to stimulate circular business models, and to provide guidance on the effective use of eco-modulation of extended producer responsibility fees to support design for circularity. It encouraged the Member States to apply economic instruments, such as environmental taxation, green tax reforms and extended producer responsibility, to promote more sustainable and circular production and consumption patterns and to improve waste management consistently with the waste hierarchy.

In its March 2022 [Versailles Declaration](#), the European Council identified the transition to a circular economy as key to reducing the EU's strategic dependencies, particularly concerning the supply of critical raw materials and energy.

## Preparation of the proposal

The [evaluations of the ELV Directive](#) and of the [3R type-approval Directive](#) showed that improvements were needed to promote the transition of the automotive sector to a circular economy, and identified four problems that concern all stages of the life cycle of the automotive sector beyond use (design, production, waste management) and that are hampering the transition of the automotive supply chain to a circular economy:

- The design and production of new vehicles do not sufficiently contribute to the Green Deal. The provisions in the current directives are too generic.
- The treatment of vehicles at the end of their life is suboptimal compared to its potential. For instance, a large share of materials, particularly automotive shredder residues (containing mostly non-metallic materials like plastics, rubber) is landfilled or incinerated.
- A significant share of vehicles subject to the ELV Directive are not collected to be treated under sound environmental conditions in the EU, contributing to pollution in third countries (each year, around 3.4 million de-registered vehicles are of unknown whereabouts ('missing vehicles') and 1 million units are exported as used vehicles).
- There is no EU level playing field for the design, production and end-of-life treatment of vehicles currently outside the scope of the ELV Directive. The vehicles outside the scope of the ELV and 3R Type-approval Directives (i.e. motorcycles, trucks and buses) are not subject to any specific requirement on eco-design and their waste phase.

To address these problems, the Commission identified five specific objectives:

- Improving circularity in the design phase of vehicles.
- Increasing the use of recycled materials in the production of vehicles (recycled content).
- Increasing the quantity and quality of materials re-used, remanufactured and recycled from ELVs.
- Collecting more ELVs in the EU and ensuring roadworthiness of used vehicles exported from the EU.
- Covering more vehicles (such as trucks or buses) which are currently outside the scope of the ELV and 3R type-approval legislation.

The preparation of the proposal included a [consultation](#) process, from July to October 2021.

The [impact assessment](#) accompanying the proposal analysed various policy options (three or four for each of the five specific objectives). The Commission estimates that the overall environmental benefits of the preferred option are an annual reduction of 12.3 million tons of CO<sub>2</sub>-equivalent in 2035. The total annual revenues for the preferred option are estimated at €5.2 billion in 2035, including €2.8 billion of monetised greenhouse gas emissions savings, and the cost at €3.3 billion, with net revenues of €1.8 billion. The cost is estimated at €66 for every new vehicle sold in 2035. An additional 22 100 jobs would be created, of which 14 200 would be in SMEs. The overall cost for public authorities would be €24 million (€2 per vehicle), mostly linked to the supervision of extended producer responsibility schemes and to enforcement activities.

In May 2023, the Regulatory Scrutiny Board issued a second [opinion](#), positive with reservations, as it considered that the impact assessment report still contained significant shortcomings (it did not sufficiently justify the need for or effectiveness of a roadworthiness certificate to control exports to third countries and was not sufficiently clear on the distributional impacts).

In its [work programme for 2022](#), the European Commission announced among the 'REFIT initiatives', under the European Green Deal, that it would put forward a revision of the ELV Directive and the '3R-type approval Directive'. The revision would aim to promote more circularity by linking design issues to end-of-life treatment, considering rules on mandatory recycled content for certain materials of components and improving recycling efficiency. Merging the two existing directives into a single instrument covering the whole life cycle of the automotive sector would aim to provide legal clarity to economic operators and administrations. Increased use of digital solutions would help to reduce the administrative burden.

## The changes the proposal would bring

On 13 July 2023, the Commission published the [proposed regulation](#) on circularity requirements for vehicle design and on management of end-of-life vehicles. The new regulation would repeal and replace both the ELV and 3R Type-approval Directives. The proposed regulation would extend the scope of the current framework, and would not apply only to cars and vans. Certain provisions on the management of end-of-life vehicles and on export requirements would also apply to certain categories of motorcycles, tricycles and quadricycles, trucks, buses and trailers, from five years after the date of entry into force of the proposed regulation.

### Circularity requirements to be verified in a type-approval process

#### Reusability, recyclability and recoverability of vehicles

Each vehicle that is type-approved under [Regulation \(EU\) 2018/858](#) on the approval and market surveillance of motor vehicles and their trailers would have to be constructed so that it is reusable or recyclable to a minimum of 85 % by mass and reusable or recoverable to a minimum of 95 % by mass, as in the current framework. The Commission would be empowered to adopt implementing acts to set up a new methodology for the calculation and verification of the rates of reusability, recyclability and recoverability of a vehicle.

#### Requirements for substances in vehicles

The presence of substances of concern in vehicles and in their parts and components would have to be minimised. In addition, any use of lead, mercury, cadmium or hexavalent chromium would be prohibited (as in the current framework). There would be some exemptions, listed in the proposed Annex III; the Commission could amend exemptions by adopting delegated acts. Moreover, other substances could be restricted under [Regulation \(EC\) No 1907/2006](#) on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), [Regulation \(EU\) 2019/1021](#) on persistent organic pollutants, and [Regulation \(EU\) 2023/1542](#) on batteries and waste batteries.

## Minimum recycled content in vehicles

The plastic contained in each vehicle type that is type-approved under Regulation (EU) 2018/858, as of six years after the date of entry into force of the new Regulation, would have to contain a minimum of 25 % of plastic recycled by weight from post-consumer plastic waste. At least 25 % of this target would have to be achieved by including plastics recycled from end-of-life vehicles in the vehicle type concerned. Furthermore, the Commission would be empowered to adopt delegated acts setting up a minimum share of steel recycled from post-consumer steel waste to be incorporated into vehicle types. The minimum share of recycled steel would have to be based on a feasibility study, carried out by the Commission and to be finalised by 23 months after the date of entry into force of the proposed regulation. By 35 months after the date of entry into force of the proposed regulation, the Commission would have to assess the feasibility of setting a requirement on the minimum share of:

- aluminium and magnesium and their alloys, recycled from post-consumer waste and incorporated into vehicle types;
- neodymium, dysprosium, praseodymium, terbium, samarium or boron recycled from post-consumer waste and incorporated into permanent magnets in e-drive motors.

After finalisation of the assessment, the Commission would be empowered to adopt delegated acts to establish a minimum share of these elements recycled from post-consumer waste that would have to be incorporated into the vehicle types to be type-approved under this Regulation and Regulation (EU) 2018/858.

## Design to enable removal and replacement of certain parts and components in vehicles

Each vehicle would have to be designed in a way that does not hinder the removal by authorised treatment facilities, during the waste phase of the vehicle, of some parts and components listed in the proposed Annex VII, such as catalytic converters, gearboxes or some electrical and electronic components. Each vehicle would have to be designed, as regards joining, fastening and sealing elements, to enable the removal and replacement of electric vehicle batteries and e-drive motors from the vehicle by authorised treatment facilities or repair and maintenance operators during the use phase and waste phase of the vehicle. The Commission could amend the list of components concerned by adopting delegated acts.

## Obligations of manufacturers

Manufacturers would have to demonstrate that new vehicles that they have manufactured and that are placed on the market, are type-approved in accordance with the requirements of Regulation (EU) 2018/858 and of the proposed regulation.

They would have, for each vehicle type that is type-approved under Regulation (EU) 2018/858 as of three years after the date of entry into force of the proposed regulation, to draw up and submit to the type approval authority a **circularity strategy**. This would include, for instance, a description of the actions planned to ensure that the vehicles belonging to the vehicle type continue to meet the legal requirements throughout their production. The manufacturer would have to monitor and follow up on the actions contained in the circularity strategy and update it every five years.

They would also have to declare, for each vehicle type that is type-approved as of three years after the entry into force of the proposed regulation under Regulation (EU) 2018/858, the shares of recycled content of: neodymium, dysprosium, praseodymium, terbium, samarium, and boron in permanent magnets in e-drive motors; aluminium and its alloys; magnesium and its alloys; and steel. The declaration would have to indicate, per material share, whether the material is recycled from pre-consumer waste or from post-consumer waste.

Manufacturers would also have to provide information on the safe removal and replacement of parts, components and materials contained in vehicles. This information would have to be accessible free of charge to waste management operators and repair and maintenance operators. Parts, components and materials present in vehicles would have to be labelled. In particular, e-drive motors containing permanent magnets would have to bear a clear and indelible label indicating, for instance, the type of the magnet.

From seven years after entry into force of the proposed regulation, each vehicle placed on the market would have to have a **digital circularity vehicle passport**, including information on the safe removal and replacement of vehicle parts and components.

## Management of end-of-life of vehicles

The proposed regulation would set up EU-level requirements on the responsibilities of vehicle manufacturers concerning the management of end-of-life vehicles: from three years after the date of entry into force of the proposed regulation, they would have extended producer responsibility for the vehicles that they sell. The extended producer responsibility scheme would have to be consistent with the requirements set in the waste Directive ([Directive 2008/98/EC](#)), and Member States would set up a register of producers to monitor their compliance with their extended producer responsibility obligations. They would have to submit an application for registration in each Member State where they sell vehicles; producers not registered would not be allowed to sell vehicles. Producers could appoint a representative for the extended producer responsibility or a producer responsibility organisation to fulfil their obligations.

The costs related to managing end-of-life vehicles would be covered by financial contributions from producers, including, for instance, the costs of collecting and treating end-of-life vehicles and the costs of conducting awareness raising campaigns aimed at improving collection of end-of-life vehicles. In cases where there is collective fulfilment of extended producer responsibility obligations, the financial contributions paid by producers would be modulated by taking into account: the weight of the vehicle; the type of drivetrain; the rate of recyclability and reusability of the vehicle type; the time needed to dismantle the vehicle at an authorised treatment facility; the share of materials and substances preventing a high-quality recycling process, such as adhesives, composite plastics, or carbon-reinforced materials; the percentage of recycled content of materials used in the vehicle; and the presence and amount of substances of concern.

A mechanism for cost allocation in cases where there is cross-border extended producer responsibility would be set up.

## Collection of end-of-life vehicles

Producers would have to set up and participate in collection systems for vehicles. These systems would, for instance, enable the collection of end-of-life vehicles of every brand, irrespective of their origin, and enable the delivery of all end-of-life vehicles free of charge to authorised treatment facilities. Member States would have to ensure that these systems function properly.

The proposed regulation would also establish an obligation to deliver all end-of-life vehicles to authorised treatment facilities. Treatment facilities would have to issue a certificate of destruction for every treated end-of-life vehicle, in an electronic format, to the last owner of the end-of-life vehicle. Vehicle owners would have to deliver their vehicles to a treatment facility when it reaches the end-of-life stage and to present the certificate of destruction for the vehicle's deregistration.

## Treatment of end-of-life vehicles

The proposed regulation would establish obligations for authorised treatment facilities on the specific action needed to treat vehicles properly. They would particularly have to depollute all end-of-life vehicles and remove the parts and components listed in Part C of the proposed Annex VII

from the end-of-life vehicle, prior to shredding or compacting. All removed parts and components would have to be assessed to determine whether they are fit for reuse, remanufacturing or refurbishment, recycling or other treatment operations. The parts and components fit for reuse, remanufacturing or refurbishment would be labelled, and traded ones would be covered by a warranty.

Member States would have to take incentives to promote the reuse, remanufacturing and refurbishment of parts and components, whether removed during the use or end-of-life phase of a vehicle – for instance, the use of economic incentives, including the establishment of a reduced rate of value added tax for used, remanufactured or refurbished spare parts and components.

Member States would have to ensure that the waste management operators meet the 85 % target for reuse and recycling of end-of-life vehicles and 95 % for reuse and recovery (there would be a transition period of three years before the new methodology is used). In addition, to increase the supply of plastic recyclates to meet the demand for recycled plastics in vehicles, a specific yearly recycling target of 30 % of the total weight of plastics contained in end-of-life vehicles would be set.

The proposed regulation would also introduce a ban on landfilling of non-inert waste that is not processed by post-shredder technology ('inert waste' means waste that does not undergo any significant physical, chemical or biological transformations).

Treatment of end-of-life vehicles may be undertaken outside the EU, provided that the shipment of end-of-life vehicles is compliant with [Regulation \(EC\) No 1013/2006](#) on shipments of waste. Shipments of end-of-life vehicles sent to a third country would only count towards the fulfilment of obligations and targets set out in the proposed regulation if the exporter of the end-of-life vehicles provides documentary evidence, approved by the competent authority in the country of destination, demonstrating that the treatment took place in conditions that are equivalent to the requirements laid down in the proposed regulation and to EU human health and environmental protection requirements.

## Export of used vehicles

The proposed Annex I would establish criteria to be used to determine whether a vehicle is end-of-life or not. From three years after entry into force of the proposed regulation, a used vehicle could only be exported if it is not an end-of-life vehicle and is considered roadworthy in the Member State where it was last registered.

## Enforcement

Member States would have to carry out regular inspections of treatment facilities, repair and maintenance operators and other operators who may treat end-of-life vehicles, and to establish penalties for infringing the new rules. They would also have to set up cooperation mechanisms at national and international level, enabling the exchange of the data needed under the proposed regulation.

## Advisory committees

The European Economic and Social Committee (EESC) adopted its [opinion](#) on the proposal on 13 December 2023. The EESC expresses support for the initiative while advocating for more ambitious measures, including the introduction of minimum mandatory recycled content targets for other materials than plastics. The EESC recommends strengthening safeguards to guarantee that authorised treatment facilities have access to vehicle parts and components, particularly electric vehicle batteries. Furthermore, the EESC recommends that manufacturers should provide independent operators with information on how to reuse parts. The EESC suggests that only authorised treatment facilities be allowed to resell the vehicle parts. It also recommends reassessing

the proposed dismantling obligations, in light of the principle of technological neutrality, their usefulness, and the economic efficiency of the existing processes.

## National parliaments

The [deadline](#) for the submission of reasoned opinions on the grounds of subsidiarity was 5 December 2023. No such opinion was delivered within the time limit.

## Stakeholder views<sup>1</sup>

The [feedback period](#) on the Commission proposal was open until 4 December 2023. It received 846 contributions.

The [European Automobile Manufacturers' Association](#) (ACEA) is concerned that the Commission may have not sufficiently examined the state of the market for recycled materials, nor existing technology gaps (some recycling technologies may not yet be available), before proposing ambitious recycled content targets. ACEA believes that EU lawmakers should rather focus on ensuring that the legislative framework affecting vehicles is coherent (particularly regulations concerning waste, products, and chemicals). ACEA stressed that the proposed regulation risks duplicating or complicating existing rules and industry best practices, hindering the industry's investments in research. The regulation should better take into account the vehicles' increasing complexities. Furthermore, ACEA considers that the current ELV and the 3R Type-approval directives should not be merged, as the current framework provides manufacturers with more certainty, for example regarding investments in recycling technologies for lithium-ion batteries.

[EuRIC](#), representing European recycling industries, welcomed the inclusion in the proposed regulation of a post-consumer recycled content target of 25 % for plastics in new cars, as today more than 80 % of the plastics reaching end-of-life in the automotive sector end up landfilled or incinerated, while plastic demand for cars continues to increase every year. EuRIC would like to see the scope of recycled content targets extended beyond plastics.

The European Environmental Bureau ([EEB](#)) regrets that the proposed regulation does not already set some recycled content targets for steel, aluminium and rare earths, as such targets would be key to creating the necessary market drivers to encourage the metal and automotive industry towards decarbonisation, and to ensuring quality recycling of metals. For the EEB, the fact that a number of important measures depend on the adoption of delegated acts will slow down the necessary transition of the sector towards a more circular model. The EEB also regrets that the proposed circularity passport does not require the disclosure of the carbon footprint of vehicles.

## Legislative process

### European Parliament

Work started in 2023. It resumed after the European elections of June 2024. In the new Parliament, the file is being dealt with under the joint committee procedure ([Rule 59](#) of the Rules of Procedure). The committees responsible are the Committees on the Environment, Climate and Food Safety (ENVI, rapporteur: Jens Gieseke (EPP, Germany)) and on the Internal Market and Consumer Protection (IMCO, rapporteur: Paulius Saudargas (EPP, Lithuania)). The joint committee's [draft report](#) was published on 29 January 2025. In total, MEPs tabled 1 929 amendments to the proposal.

The joint committee report was adopted on 7 July 2025 with 79 [votes](#) in favour, 27 against and 11 abstentions. The amendments adopted by the committee would exempt new categories of vehicles, such as vehicles designed and constructed for the armed services only and vehicles of special cultural interest. Furthermore, they specify that manufacturers should not obstruct the removal and replacement of vehicle parts and components using software updates, and that manufacturers

should provide access to software documentation and diagnostic tools. In addition, the plastic contained in each vehicle type that is type-approved as of six years after the date of entry into force of the new Regulation would have to contain a minimum of 20 % (instead of 25 % as proposed by the Commission) plastic recycled by weight from post-consumer plastic waste. At least 15 % of this target (instead of 25 %) would have to be achieved by including plastics recycled from end-of-life vehicles in the vehicle type concerned. Each new vehicle type that would be type-approved as of 10 years after the date of entry into force of the new Regulation should meet a target of at least 25 %, unless the lack of availability or excessive prices of specific recycled plastics makes compliance with that target excessively difficult.

Moreover, by two years after the entry into force of the new Regulation, the Commission would be required to adopt a delegated act setting a minimum share of steel recycled from ferrous scrap and a minimum share of recycled aluminium and its alloys to be incorporated into vehicle types. The minimum share of recycled steel, aluminium and its alloys would have to be based on a feasibility study, carried out by the Commission and to be finalised by 12 months after the date of entry into force of the proposed Regulation.

Circularity strategies would be established at the level of manufacturers. Furthermore, the amendments specify that it would not be mandatory for authorised treatment facilities to remove, prior to shredding, parts and components that do not have a market potential for reuse, remanufacturing and repair, under certain conditions.

The vote in plenary is planned for September 2025.

## Council

Discussions started in the Council in October 2023, within the Working Party on the Environment. The Council adopted its [position](#) on the proposal ('general approach') on 17 June 2025. The Council adds Article 192(1) of the Treaty on the Functioning of the European Union (TFEU) (environment) as the legal basis for chapters IV (management of ELV) and V (used vehicles and their export) of the proposed Regulation, while the other provisions remain based on Article 114 TFEU (internal market). The Council amendments would also extend some of the new obligations, such as design enabling the removal of certain parts, the establishment of a circularity strategy or the labelling of parts, components and materials present in vehicles, to heavy-duty vehicles and two- or three-wheel vehicles and quadricycles.

The Council amendments would introduce a three-stage approach for the plastic recycled content targets: the targets would gradually increase from at least 15 % (instead of 25 % as proposed by the Commission) for each vehicle type that would be type-approved from six years after the entry into force of the new Regulation, to 20 % after eight years and 25 % after 10 years. The Commission could lay down temporary derogations to the recycled plastic content targets in case of lack of availability or excessive prices of specific recycled plastics.

To reduce the burden on vehicle manufacturers, the Council also proposes that they should establish a circularity strategy for each vehicle category, rather than for each type-approved model. Furthermore, the Council specified that parts or components without reuse, remanufacturing or refurbishing potential are not mandatory to remove prior to shredding, under certain conditions, particularly if certain quality criteria and limit values are met by post-shredding technologies.

## SOURCES

European Parliament, [Circularity requirements for vehicle design and management of end-of-life vehicles](#), Legislative Observatory (OEIL).

## ENDNOTES

- <sup>1</sup> This section aims to provide a flavour of the debate and is not intended to be an exhaustive account of all different views on the proposal.

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