

## Danish non-paper on the revision of ELV Directive (EC) 2000/53 and 3R Type Approval Directive (EC) 2005/64 8 May 2023

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The principles of circular economy should be incorporated into the EU automotive regulations. The Danish Government therefore calls for a strong focus on circular economy in the revision of the End-of-Life Vehicle (ELV) Directive and the 3R Type Approval Directive. The following points are of particular importance:

- The revision should **merge the ELV Directive with the 3R Type Approval Directive** to promote a circular approach by covering the entire life cycle of vehicles by linking design to waste management. The merged regulation should have the broadest possible scope, including trucks, busses, and motorcycles.
- The new proposal should include **clearly defined eco-design requirements and legally binding targets** for waste reduction, remanufacturing, and recycling.
- **A Digital Product Passports for all type-approved vehicles** should be implemented to strengthen traceability and improve access to relevant product recycling information and potentially contribute to prevent illegal export.

### **Merge the ELV Directive with the 3R Type Approval Directive**

Denmark strongly supports the merging of the ELV and 3R Type Approval Directives. Both directives are closely linked to the circularity of vehicles on the EU market. Thus, a merge would couple a vehicle's design phase with the waste-handling phase more rigorously and secure a higher degree of circularity in the automotive industry. The evaluation of the ELV Directive supports this approach by alluding to incoherence between the two directives and refers to "*doubts that some recent car models actually comply with the obligations of Directive 2005/64/EC*". As such, the ELV and 3R Type Approval directive have been unable to sufficiently impact the circularity of the automotive industry, which emphasizes the need for a comprehensive revision of both. Furthermore, the forthcoming regulation needs to cover as many vehicle types as possible, including Category L, O, T and R vehicles, and incorporate more N and M subcategories in the legislation. The current legislation leaves out 25 pct. of all vehicles, which means that a large share of EU vehicles are not subject to compulsory treatment at an approved waste treatment facility.

### **Clearly defined eco-design requirements and legally binding targets**

If the automotive industry is to become truly circular, the revision should draw on the principles from the upcoming Eco-design Regulation. Therefore, Denmark encourages the Commission to set ambitious and clearly defined eco-design requirements in order to reduce the environmental footprint. Besides, the proposal should include ambitious and legally binding targets for waste reduction, remanufacturing and recycling. This should include material specific recycling targets for critical raw materials in order to increase the quality of recycling and improve EU's strategic autonomy.

### **A Digital Product Passport for all type-approved vehicles**

The revision of the directives should address the need to improve the sharing of product related information along the value chain by implementing a digital product passport for the products in scope, which complements upcoming product passport for specific components such as batteries. The product passport should be based on the framework from the Eco-design Regulation and contribute to value retention of products and materials. Implementing a digital product passport is vital to enhance the circularity of all type-approved vehicles in scope. In the future, the product passport could potentially contribute to prevent the illegal export of ELVs from the EU by containing information about both vehicle whereabouts and producer/importer of the vehicle. The digital product passport combined with robust market surveillance would ensure a level-playing field and support the transition to a more circular European automotive industry