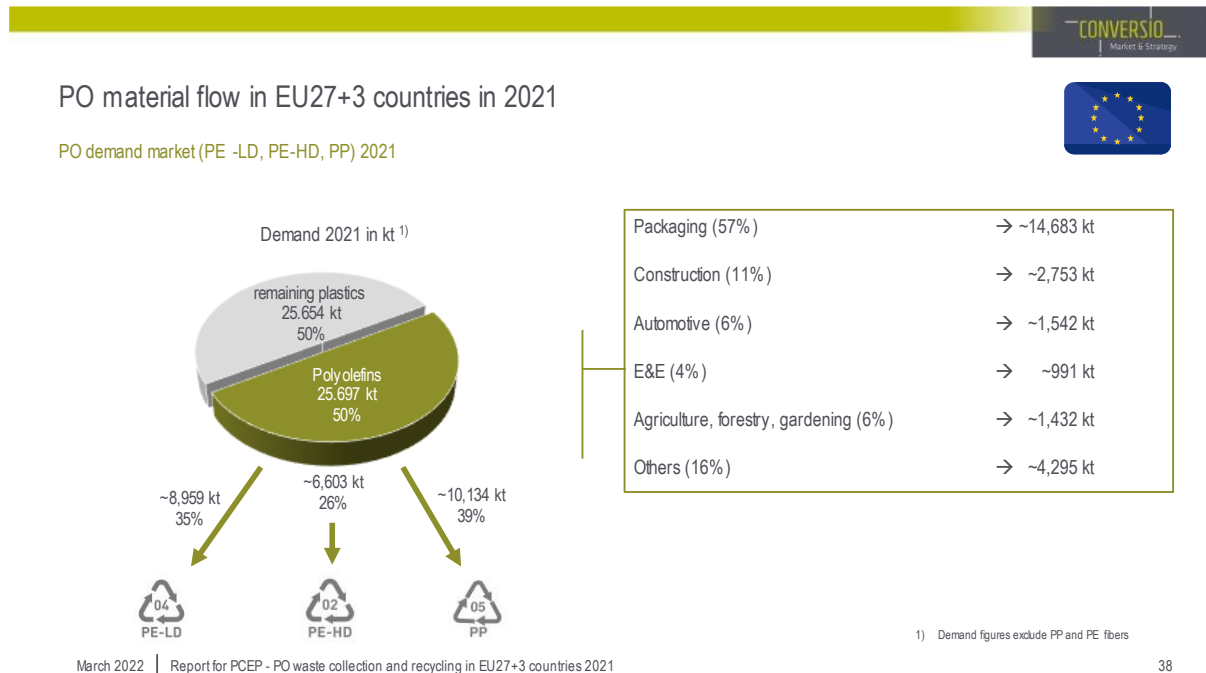


Circularity in vehicle design and on  
the management of end-of-life  
vehicles

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**PCEP** (the Polyolefin Circular Economy Platform), brings together actors from across the polyolefin value chain, united in our common mission to drive the transition to a circular economy for polyolefins - the most commonly used family of plastics. 71.4% of plastics packaging in Europe is made of polyolefins, accounting for 71% of collected plastic waste. This collected material goes on to be transformed into 84.7% of post-consumer recycled polyolefins, used today in European products across building and construction, packaging, agriculture, automotive, electronics, and other sectors.

According to PCEP’s data, out of 25 MT of polyolefins demand in Europe in 2021, packaging is the biggest market with 14 MT, followed by construction and then automotive with 1.5 MT. See table below.



Therefore, with polyolefins widely used in the manufacture of vehicles, PCEP welcomes the proposed regulation on circularity requirements for vehicle design and on the management of end-of life vehicles. The automotive sector is already a major user of recycled polyolefins, and this regulation should drive improved circularity by increasing the recyclability of plastics components and the recycling rate of plastics from end-of-life vehicles. In addition, the plastic recycled content target will support polyolefin circularity and give the clear demand signals needed to speed up industry’s investments in the circular economy.

Over the last decade, the automotive sector has made notable progress both in the recycling of plastics from end-of-life vehicles and the use of recycled content in plastics components used in new vehicles. This has been driven by the high general recycling targets in the current ELV Directive, which necessitate the recycling of plastic as well as metallic parts of end-of-life

vehicles, and also voluntary commitments by manufacturers on the use of recycled plastic in new vehicles. However, the sector faces a multitude of challenges in increasing plastics circularity including the wide range of different polymers used and the long-time lag between improvements being made in new vehicle design and these having an impact on end-of-life recovery and recycling.

**PCEP welcomes the target of recycling 30%** of the plastic in vehicles delivered to waste management operators which we hope will increase investment in processing equipment to recover plastics from shredder residues. This in turn will stimulate plastics circularity in the automotive sector specifically and support attainment of the 25% of the plastic recycled content target that must be met from ELV plastic. Currently there is a significant lack of processing capacity of this type in the EU as a whole and it is key to diverting waste plastics to recycling routes. Increased supply of this mixed waste plastic feedstock should in turn drive investment in the additional specialist plastic recycling capacity needed to meet the target. We believe a 60-month period to put the necessary infrastructure in place is realistic.

**PCEP also supports the landfill ban** on non-inert waste that has not passed through post shredder treatment plants will also support the 30% target. **As a recommendation, PCEPs suggests that the legislation is more precise on which waste management operator is obligated to meet the 30% target and at what point in the supply chain.** Due to the challenging nature of some of the plastics used vehicles, PCEPs supports the use of different recycling technologies in meeting these targets, both mechanical / physical and chemical. As such, we call for legal clarity around their use and recycled content accounting methodologies to support the required investment.

**PCEP supports the use of mandatory recycled content targets set at levels that will drive demand and maximise environmental benefits.** Plastics used in the automotive sector must meet high technical, and often also aesthetic, standards and so a target of 25% is challenging but we believe achievable. The automotive sector is already a key end user of recycled polyolefins, in particular polypropylene. Requiring that 25% of the target must be met from recycled plastic produced from end-of-life vehicles strikes a good balance between creating demand for the increased recycled plastic that will come from this legislation, but also allowing the market to operate freely. In addition, **PCEP also supports a consideration of separate targets for the use of biobased plastics.** Whilst we fully support ambitious recycled content targets, we call on the Commission to take a holistic approach when setting such targets across EU legislation to ensure alignment with all upcoming environmental legislations which are introducing mandatory recycling targets and thus that all targets remain achievable whilst also driving the optimal environmental outcome.

To support a real change related to recycling levels and use of recycled content, **we ask for the legislation to be clear that thermoset plastics are included in the definition of plastic.** This

is important as they are used widely in the automotive sector, for example in cross-linked polyethylene.

We support the exclusion including tires, as these will be subject to regulation under Eco-Design for Sustainable Products. We also support the exclusion of other rubber items.

**Design for recycling in vehicles is of great importance with many of the current plastics used in vehicles being difficult to recycle.** For example, due to the use of fillers, lacquered plastics, or the use of composites. **As such, we support the target that 85% by mass of new vehicles must be reusable and recyclable within 72 months of the Regulation coming into force.** We believe this will drive innovation in the types of plastics and composites used and support investment in innovative recycling technologies that may be required to meet both this objective and the general and plastic specific recycling targets. Provisions on design to remove certain parts, including bumpers and dashboards, combined with labelling requirements will help with recycling plastic waste streams from repair shops and facilitate their removal prior to shredding.

**We ask that references to substances of concern are not included in the legislation as these are already extensively covered in the REACH Regulation.** Including references to them, other than when directly linked to circularity in plastics, risks creating legal uncertainty.

**The strengthening of EPR provisions and the use of fee modulation to support recyclability objectives** and drive recycled content use beyond the legal minimum, where possible, is also welcome.