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CONTRIBUTION

From: To:	General Secretariat of the Council Working Party on the Environment
N° Cion doc.:	11888/23 + ADD 1 to ADD 7 + ADD 8 REV 1
Subject:	End-of-Life Vehicles Regulation: Follow-up to the WPE on 20 January 2025 – comments from a delegation

Delegations will find attached contributions received from the IT delegation.

WK 16429/24
IT COMMENTS

We would like to share some comments and amendment proposals on the compromise text circulated last December. We reserve to provide any additional remark on other topics, based on the discussion at the WPE.

Legal Basis	
Text proposed by the Hungarian PSY	***Amendment***
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 114 thereof **and Article 192(1) thereof in relation to Articles 14 to 45, Article 46 and Article 48 of this Regulation**	Having regard to the Treaty on the Functioning of the European Union, and in particular Article 114 thereof, ~~and Article 192(1) thereof in relation to Articles 14 to 45, Article 46 and Article 48 of this Regulation~~
Comment: We prefer to maintain the legal basis 'Market' (Art.114) on the whole proposal in order to harmonise regulatory provisions and create a real European market for spare parts.	

Article 2(1)(c) – Scope	
Text proposed by the Hungarian PSY	***Amendment***
1. This Regulation shall apply: (c) from [OP: Please insert the date = the first day of the month following 60 months after the date of entry into force of this Regulation] to vehicles and end-of-life vehicles and of categories L3e, L4e, L5e, L6e and L7e as set out in Article 4(2), points (c) to (g), of Regulation (EU) 168/2013;	1. This Regulation shall apply: (c) from [OP: Please insert the date = the first day of the month following 60 months after the date of entry into force of this Regulation] to vehicles and end-of-life vehicles and of categories ***L1e, L2e***, L3e, L4e, L5e, L6e and L7e as set out in Article 4(2), points (c) to (g), of Regulation (EU) 168/2013;
Comment: We would welcome the extension of the regulation to categories L1 and L2, since motorbikes (L3 - L7) are already covered by the Commission proposal.	

Article 2(2)(c) – Scope	
Text proposed by the Hungarian PSY	***Amendment***

2. This Regulation shall not apply to: (c) vehicles produced in small series, as defined in Article 3, point (30), of Regulation 2018/858;	2. This Regulation shall not apply to: (c) vehicles produced in small series, as defined in Article 3, point (30), of Regulation 2018/858 ***and as defined in Article 42 of Regulation EU 168/2013.***
Comment: include 'small series' also for L vehicles categories. In order to ensure uniformity of approach and to avoid discrimination, we request that the exclusion be extended to 'small series' of L-categories as well, by including a reference to Art. 42 of Regulation (EU) 168/2013 type-approval for L-category vehicles.	

Article 2(2)(d) – Scope	
Text proposed by the Commission	*Amendment*
This Regulation shall not apply to: ~~***(a) special purpose vehicles as defined in Article 3, point (31), of Regulation (EU) 2018/858;***~~ (b) other parts of a vehicle that have been type-approved in multi-stage type approval of category N1, N2, N3, M2 or M3 than the base vehicle; (c) vehicles produced in small series, as defined in Article 3, point (30), of Regulation 2018/858; vehicles of historical interest as defined in Article 3, point (7), of Directive 2014/45/EU. (d) vehicles of historical interest as defined in Article 3, point (7), of Directive 2014/45/EU.	This Regulation shall not apply to: (a) **special purpose vehicles as defined in Article 3, point (31), of Regulation (EU) 2018/858;** (b) other parts of a vehicle that have been type-approved in multi-stage type approval of category N1, N2, N3, M2 or M3 than the base vehicle; (c) vehicles produced in small series, as defined in Article 3, point (30), of Regulation 2018/858; (d) vehicles of historical interest as defined in ***Article 3, 1. (36) and all their parts, components and spare parts necessary for their maintenance activities to ensure their historical status.***
Comment: **(a):** we prefer to maintain the previous version and the exclusion of special purpose vehicles. **(d):** The amendment aims to exclude from the classification of 'end-of-life vehicles' not only vehicles of historic interest, but also all their spare parts and components. This exclusion is essential to ensure that these vehicles can always be repaired and maintained in order to preserve their historical and cultural value. By allowing access to the necessary parts and components, the functioning and preservation of these important vehicles for future generations can be guaranteed.	

Article 2(3) – Scope	
Text proposed by the Hungarian PSY	***Amendment***
3. Notwithstanding paragraph 1, point (b), the following provisions shall not apply to vehicles and end-of-life vehicles	3.Notwithstanding paragraph 1, point (b), the following provisions shall not apply to vehicles and end-of-life vehicles of categories M2, M3, N2, N3 and

of categories M2, M3, N2, N3 and O:	O:
(a)Article 4 on reusability, recyclability and recoverability of vehicles;	(a)Article 4 on reusability, recyclability and recoverability of vehicles;
(b)Article 5 on requirements for substances in vehicles;	(b)Article 5 on requirements for substances in vehicles
(c)Article 6 on minimum recycled content in vehicles;	(c)Article 6 on minimum recycled content in vehicles;
~~**(d)Article 7 on design to enable removal and replacement of certain parts and components in vehicles;**~~	**(d)Article 7 on design to enable removal and replacement of certain parts and components in vehicles;**
~~**(e)Article 8 on general obligations;**~~	**(e)Article 8 on general obligations;**
~~**(f)Article 9 on circularity strategy;**~~	**(f)Article 9 on circularity strategy;**
(g)Article 10 on declaration on recycled content present in vehicles;	(g)Article 10 on declaration on recycled content present in vehicles;
(h)Article 12, **paragraph 1** on labelling of parts, components and materials present in vehicles;	(h)Article 12~~, **paragraph 1**~~ on labelling of parts, components and materials present in vehicles;
(i)Article 13 on **digital** circularity vehicle passport;	(i)Article 13 on digital circularity vehicle passport;
(j)Article 21 on fee modulation;	(j)Article 21 on fee modulation;
(k)Article 22 on cost allocation mechanism for vehicles becoming end-of-life vehicles in another Member State;	(k)Article 22 on cost allocation mechanism for vehicles becoming end-of-life vehicles in another Member State;
~~**(l)Article 28 on general requirements for shredding;**~~	**(l)Article 28 on general requirements for shredding;**
~~**(m)Article 30 on mandatory removal of parts and components for reuse and recycling prior to shredding;**~~	**(m)Article 30 on mandatory removal of parts and components for reuse and recycling prior to shredding except for the entries 1-3 of Part C of Annex VII;**
~~**(n)Article 31 on requirements concerning the removed parts and components;**~~	**(n)Article 31 on requirements concerning the removed parts and components;**
~~**(o)Article 32 on trade of used, remanufactured or refurbished parts and components;**~~	**(o)Article 32 on trade of used, remanufactured or refurbished parts and components;**
~~**(p)Article 33 on reuse, remanufacturing and refurbishment of parts and components;**~~	**(p)Article 33 on reuse, remanufacturing and refurbishment of parts and components;**
(q)Article 34 on reuse, recycling and recovery targets;	(q)Article 34 on reuse, recycling and recovery targets;
~~**(r)Article 35 on ban on landfilling of non-inert waste;**~~	**(r)Article 35 on ban on landfilling of non-inert waste;**
(s)Article 36**, paragraph 2** on shipments of end-of-life vehicles.	(s)Article 36~~, **paragraph 2**~~ on shipments of end-of-life vehicles.

<u>Comment:</u> The Commission proposal envisaged a step-by-step approach whereby certain standards would apply to M2, M3, N2, N3 vehicles for the first time. As already expressed, there is no support for extending further standards to these vehicles beyond what the Commission has already proposed and which would not be covered by a proper impact assessment. It is recalled that heavy-duty vehicles are more complex, have a longer average life and come to the end of their life in limited numbers. It is necessary for dismantlers and treatment facilities to gain experience and to fill the existing knowledge gap before imposing further obligations and related costs on manufacturers.

Article – 2(5) – Scope	
Text proposed by the Hungarian PSY	*Amendment*
~~***5. Notwithstanding paragraph 2, point (a), the following provisions shall apply to special purpose vehicles:***~~ ~~***(a) Article 5 on requirements for substances in vehicles;***~~ ~~***(b) Article 16 on extended producer responsibility;***~~ ~~***(c) Article 20 on financial responsibility of producers;***~~ ~~***(d) Article 23 on collection of end-of-life vehicles;***~~ ~~***(e) Article 24 on delivery of end-of-life vehicles to the authorised treatment facilities;***~~ ~~***(f) Article 25 on certificate of destruction;***~~ ~~***(g) Article 26 on obligations for the vehicle owner;***~~ ~~***(h) Article 29 on depollution;***~~ ~~***(i) Article 30 on mandatory removal of parts and components for reuse and recycling prior to shredding.***~~	5. Notwithstanding paragraph 2, point (a), **<u>and without prejudice to paragraph 3</u>**, the following provisions shall apply to special purpose vehicles: **<u>(a) Article 5 on requirements for substances in vehicles;</u>**
<u>Comment</u>: In this way we would ensure a reduced presence of hazardous substances.	

Article – 2(6) – Scope	
Text proposed by the Hungarian PSY	*Amendment*

6.	Notwithstanding paragraph 1, points ~~*(b* c),~~ (~~*c* d),~~ and **(e)** Articles **7,** 8, 9, 16, ~~***19***~~, ~~***20,***~~ 27, 30, and 46 to 49, shall apply to vehicles and end-of-life vehicles of categories L_3, L_4, L_5, L_6 L_7, M_2, M_3, N_2, N_3, **O** and ~~***O***~~ **M_2, M_3, N_2, and N_3 categories of special purpose vehicles** with the following modifications: ~~*(a) the extended producer responsibility, referred to in Article 16, shall include the obligation of producers of such vehicles to ensure that vehicles, that they have made available on the market for the first time within the territory of a Member State and that become end-of-life vehicles, are:*~~ ~~*(i) collected, in accordance with Article 23;*~~ ~~*(ii) depolluted, in accordance with Article 29;*~~ ~~*(b) the authorisation, referred to in Article 19, shall be granted upon demonstration that the applicant meets the criteria laid down in Article 19(2) with respect to the collection and depollution of vehicles;*~~ ~~*(c) the financial contributions to be paid by producers in accordance with Article 20(1), point (a), shall cover the costs of collection and depollution of vehicles of such categories, which are not covered by the revenues of waste management operators linked to the sales of used spare parts and used spare components, of depolluted end-of-life vehicles, or of secondary raw materials recycled from end-of-life vehicles;*~~ ~~*(d) Article 27 shall apply except for paragraph 3, points* **2, point** *(c) and* **point** *(d)* **concerning the treatment of all end-of-life vehicles and their parts, components and materials in accordance with Articles 32, 35 and 36 and point (e) concerning Article 34;***~~ ~~*(e) Articles 46 to 49 shall apply only with respect to enforcement of obligations applicable for such vehicle categories.*~~ **(a) Article 7 shall only apply with respect to entries 1a, 2, 3, 5, 8 and 9 of Part C of Annex VII;.** **(b) Article 8 shall only apply with respect to the obligations applicable for such vehicle categories;**	**6. *Without prejudice to*** paragraph 1, points ~~**(c)**~~**(b)** and ~~**(d)**~~**(c)**, **and paragraph 2 point (b) Articles** ~~**7,**~~ 8, ~~**9,**~~ 16**, *19*, 20,** 27 and 46 to 49 shall apply to vehicles and end-of-life vehicles of categories L3, L4, L5, L6 L7, M2, M3, N2, N3 and *O* ***and to other parts of a vehicle that have been type-approved in multi-stage type approval of category N1, N2, N3, M2 or M3 than the base vehicle*** with the following modifications: **(…)** **6a. Without prejudice to paragraph 1, points (a) and (c), and paragraph 2, point (b), Article 6 shall not apply to vehicles and end-of-life vehicles of category L.** ….

(c) Article 9, if applicable for such vehicle categories shall only apply with respect to paragraphs 5 to 7, Part A of Annex IV; **(d) Article 16 point b) shall not apply;** **(e) Article 27 shall apply except for paragraph 2, point (e);** **(f) Article 30 shall only apply with respect of entries 1a, 1b, 2, 3, 5, 8 and 9 Part C of Annex VII;** **(g) Articles 46 to 49 shall apply only with respect to reporting and enforcement of obligations applicable for such vehicle categories.**	
Comment: The bodywork of multi-stage vehicles is explicitly taken out of the Regulation scope by Art. 2, p. 2. (b). Yet no rule is foreseen for dismantling/depolluting/treating end-of-life bodywork of multistage vehicles, which would normally arrive at ATFs together with the base vehicle. This might lead to uncertainty in the application of producers' responsibility and on how to deal with the bodywork treatment process and associated costs, since the liability for vehicle collection and depollution lies with the base vehicle producer. To exclude such undesired effects, responsibilities for decoupling bodywork and further managing it (depollution, storage, etc.) should be clearly assigned in the Regulation. Further, taking bodywork into the EPR scope will reduce potential business and legal dispute risks concerning splitting responsibility within EPR for multi-stage vehicles.	

Article – 3(1)(2) Definitions	
Text proposed by the Hungarian PSY	*Amendment*
'end-of-life vehicle' means a vehicle which is waste as defined in Article 3, point (1), of Directive 2008/98/EC, or ~~vehicles that are irreparable~~ **which is waste** according to ~~criteria Part A, points 1 and 2 of~~ Annex I;	'end-of-life vehicle' means a vehicle which is waste as defined in Article 3, point (1), of Directive 2008/98/EC, **or which correspond to criteria set in** ~~vehicles that are irreparable **which is waste** according to criteria Part A, points 1 and 2 of~~ Annex I;
Comment: We consider the definition to be misleading as it seems that there are two definitions of waste, one under Directive 2008/98/EC and the other one under the criteria set out in Annex I of the ELV Regulation. The definition of waste is only the one contained in Directive 2008/98/EC. However, a vehicle may be considered ELV even when it just meets the criteria set out in Annex I of the Regulation.	

Article 3(1)(40) – Definitions	
Text proposed by the Hungarian PSY	***Amendment***

Biobased plastics' means plastics made from biological resources, such as biomass feedstock, organic waste or by-products. Biobased plastic can be both, and irrespective of whether the plastics are biodegradable or non – biodegradable;	~~Biobased~~ ***Biomass-derived plastics means plastics*** ~~made~~ ***wholly or partly derived*** from biological resources, such as biomass feedstock, ***including*** organic waste or by-products. ~~Biobased plastic can be both, and irrespective of whether the plastics are biodegradable or non-biodegradable;~~ ***Biomass-derived plastics encompass bio-based and bio- attributed plastics.*** *Or as alternative:* ***Biomass-derived plastics means plastics wholly or partly derived from biomass, encompassing bio-based and bio- attributed plastics.***

Comment:

We believe that the term biobased plastics should be replaced by the term **biomass-derived plastics**, clearly stating that (i) biomass-derived plastics are plastics wholly or partially derived from biomass and (ii) include biobased and bioattributed plastics, thus allowing a clear distinction between them.

We emphasise that **biomass-derived plastics** should be distinguished into two different subgroups:

- **Bio-based plastics** - plastics derived from biomass according to CEN/TC 411, which verifiably contain constituents of biological origin. Therefore, the bio-based content of these plastics can be verified and confirmed according to EN 16640 (by radiocarbon methods).
- **Bio-attributed plastics** - plastics for which the mass balance methodology is applied to account for the use of bio-based raw materials in their production. In line with ISO 22095, the mass balance approach is a chain of custody model in which sustainable raw materials (including bio-based raw materials) are mixed according to defined criteria with materials or products with other characteristics, e.g. virgin fossil-based raw materials. The use of bio-based raw materials for the production of plastics is attributed through a mass balance approach.

Article 3, 1(41) – Definitions (new)	
Text proposed by the Hungarian PSY	***Amendment***
-	**'Vehicle of historical interest' means any vehicle which is considered to be historical by the Member State of registration or one of its appointed authorizing bodies and which fulfils all the following conditions:** • **it was manufactured or registered for the first time at least 20 years ago;** • **its specific type, as defined in the relevant Union or national law, is no longer in production;** • **it is historically preserved and maintained in its original state and has not undergone substantial changes in the technical characteristics of its main components;** art.3(2d) In addition to the definitions referred to in paragraph 1, the following definitions should apply. ~~**(d) 'vehicle of historical interest'**~~, (…) laid down in article 3, points ~~**(7),**~~ (9) and (12) of Directive 2014/45/EU

Comment:

The decade prior to 'vehicle of historic interest' status, where the vehicle already fulfils the last two conditions set out in the definition, lacks the protection and preservation necessary for the growth of this niche.

This recognition is essential to ensure the continuity and preservation of the historic vehicle fleet and the European automotive heritage. Through this measure, national scrappage schemes will facilitate the attainment of the age requirements for 'vehicles of historic interest'.

Finally, it should be noted that the current definition, dating back to 2009, could not foresee the current speed of technological innovations, causing vehicles to become obsolete more quickly. This addition therefore allows the designated authorising bodies to take into account the increased speed at which vehicles become of historic interest.

Article 5 - ***Requirements for substances in vehicles***	
Text proposed by the Hungarian PSY	*Amendment*
1. The presence of substances of concern in vehicles and in their parts and components shall be minimised as far as possible.	**(1): Manufacturers shall, in liaison with material and equipment manufacturers, endeavor to minimize** substances of concern in vehicles and in their parts and components **from the conception of the vehicle onwards, so as in particular to prevent their release into the environment, make recycling easier and avoid the need to dispose of hazardous waste.**
2. In addition to the restrictions set out in Annex XVII to Regulation (EC) No 1907/2006 and, ~~**as applicable, to the**~~ restrictions set out in Annexes I and II to Regulation (EU) 2019/1021 and in Regulation (EU) 2023/**1542, this regulation specifies the regime for substances in vehicles** ~~*./[OP: Batteries]*~~**, A**ny vehicle type that is type-approved as of [*OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of this Regulation*], under Regulation (EU) 2018/858, **or any new parts or components put on the market for such a vehicle**, shall not contain lead, mercury, cadmium or hexavalent chromium.	**(2): Any materials and components put on the market for any new** vehicle type that is type-approved as [*OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of this Regulation*] shall not contain lead, mercury, cadmium or hexavalent chromium.
2a. By [Insert a date not later than 24 months after adoption of this Regulation], the Commission, assisted by the European Chemicals Agency, shall prepare a report on the presence of substances of concern in vehicles, to determine the extent to which they negatively affect the re-use and recycling of materials or impact chemical safety.	***(2a):*** **48 months after the date of entry into force of the Regulation, the Commission, assisted by the European Chemicals Agency set up under Regulation (EC) No 1907/2006 ('the Agency'), shall prepare a report on substances of concern, namely substances having an adverse effect on human health or the environment or hampering recycling for safe and high quality secondary raw materials, present in vehicles or used in their manufacture.**

The Commission shall submit the report to the European Parliament and to the Council, detailing its findings and consider the appropriate follow-up measures, including i) **the establishment of restrictions on substances of concern that negatively affect the re-use and recycling of materials in the vehicles in which they are present, as a part of delegated acts set up in accordance with Article 5(2), point (b)** ii) **the introduction of information requirements as a part of the digital circularity vehicle passport in accordance with Article 13(2), point e and Article 13(6), point (e)** iii) **the use of the procedures referred to in Article 68(1) and (2) of Regulation (EC) No 1907/2006 to adopt new restrictions.**	**The Commission shall submit that report to the European Parliament and to the Council detailing its findings and shall consider the appropriate follow-up measures including the adoption of delegated acts.**
If a Member State considers that a substance negatively affects the re-use and recycling of materials in a vehicle in which it is present it shall, by [insert date], supply such information to the Commission and the European Chemicals Agency and, where available, refer to the relevant risk assessments or other relevant data.	
2b. By [insert a date not later than 36 months after the adoption of this Regulation], the Commission is empowered to adopt delegated acts in accordance with Article 50 to supplement this Regulation by establishing restrictions for the presence of substances of concern that negatively affect the re- use and recycling of materials in vehicles and in their parts and components, for reasons not relating primarily to chemical safety.	
5. Upon request from the Commission, and within 12 months from the request, the European Chemicals Agency (the 'Agency') shall prepare a report on the technical and economic feasibility of alternatives pertaining to existing exemptions listed in Annex III and, based on such assessment, a motivated proposal for the specific amendment of the exemption.	(5): Upon request from the Commission, and within 12 months from the request, the European Chemicals Agency (the 'Agency') shall prepare a report**, *based on consultation with stakeholders and industry experts*,** on the technical and economic feasibility of alternatives pertaining to existing exemptions listed in Annex III and, based on such assessment, a motivated proposal for the specific amendment of the exemption.
6. As soon as it receives the request from the Commission, the Agency shall publish on its website a notice that a report on a possible amendment of an exemption in Annex III will be prepared and invite **Member States and** all interested parties to submit comments within eight weeks from the date of publication of the notice. The Agency shall publish on its website all comments received from **Member States and** the interested parties.	(6): As soon as it receives the request from the Commission, the Agency shall publish on its website a notice that a report on a possible amendment of an exemption in Annex III will be prepared and invite all interested parties to submit comments ***twelve*** **-** week ***stakeholder consultation process***.
7. At the latest nine months following the submission of the report referred to in paragraph **4 5** to the Commission, the	**(7):** At the latest ***twelve*** months following the submission of the report referred to in paragraph 4 to the Commission,

Committee for Socio-economic Analysis of the Agency, set up pursuant to Article 76(1), point (d), of Regulation (EC) No 1907/2006, shall adopt an opinion on the report and on the specific amendments proposed. The Agency shall submit that opinion to the Commission without delay.	the Committee for Socio-economic Analysis of the Agency, set up pursuant to Article 76(1), point (d), of Regulation (EC) No 1907/2006, shall adopt an opinion on the report and on the specific amendments proposed.
Comment: The responsibility for the reduction of hazardous substances should concern not only vehicle manufacturers, but also those of vehicle materials and components, even for subsequent installation. This clarification would allow the reduction of hazardous substances also for those special vehicles and multi-stage vehicles to which modifications are made to the initial model according to the needs of use. In addition, the identification of hazardous substances should also take into account that these substances after recycling can be used again in the manufacture of new vehicles.	

Article 6 - ***Minimum recycled content in vehicles***	
Text proposed by the Hungarian PSY	*Amendment*
The plastic contained in each vehicle type that is type-approved as of [OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of the Regulation] under Regulation (EU) 2018/858 shall contain a minimum of **- %** of plastic recycled by weight from post-consumer plastic waste. At least - % of the target set out in the first subparagraph shall be achieved by including plastics recycled from end-of- life vehicles in the vehicle type concerned.	The plastic contained in each new vehicle type that is type-approved as of [OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of the Regulation] under Regulation (EU) 2018/858 ***or 48 months after the entry into force of the implementing act referred to in Art. 6 (2), whichever is the latest, shall contain a minimum of 15% of plastic ~~recycled~~ by weight from sustainable resources such as biopolymers, plastics and elastomers recycled from post-consumer and pre-consumer plastic and elastomer waste including plastics recycled from end-of-life vehicles and from workshop waste.*** ***The minimum content of recycled plastics in each vehicle type shall increase to 20% as of the first day of the month following 132 months after the date of entry into force of the Regulation or 108 months after the entry into force of the implementing act referred to in Art. 6 (2), whichever is the latest.*** ***After the entry into force of the delegated act under paragraph 2, and no later than 31 December 2028, the Commission shall assess whether, due to the existing and forecasted availability of plastics recovered from waste, or lack thereof, and in view of technical and scientific progress, it is appropriate to revise the targets laid down in subparagraphs (a) and (b).*** ***Where justified and appropriate on the basis of the assessment made under the previous paragraph, the Commission shall be empowered to adopt, by 36 months after entry into force of the Regulation and every 5 years thereafter, a delegated act in accordance with Article 73, to amend the targets laid down in paragraphs (a) and (b).*** ***~~At least - % of the target set out in the first subparagraph shall be achieved by including plastics recycled from end-of- life vehicles in the vehicle type concerned.~~***

	The weight of the plastic contained in each vehicle and the weight of recycled plastic referred to in the first subparagraph shall exclude elastomers, thermosets other than polyurethane foams used for cushioning and plastics that contain or are contaminated by any substance regulated by Article 7 of Regulation (EU) 2019/1021 when the thresholds of Annex IV of that Regulation are exceeded. ***Vehicle manufacturers shall progressively include plastics recycled from end-of-life vehicles in new vehicle types taking into account the state of the art of technology and availability of materials.***

Comment: A gradual approach should be preferred to achieve the implementation of the targets. These targets should be aligned with the proposals put forward by the ambitious scenario (3b) described in the JRC study report, where a first target of 15% 72 months after entry into force of the regulation and a second target of 20% five years later would be more realistic. Currently, the availability of secondary closed-loop raw materials that meet the required safety and quality standards for vehicles is extremely low. This is mainly due to state-of-the-art recycling technologies, the very long lifespan of vehicles and the presence of legacy substances that are no longer permitted or desired in new vehicle types. Therefore, the definition of any closed-loop target should be based on an assessment with the active participation of industry.
With the aim of reducing the use of virgin raw materials and CO2 emissions, all sustainable materials should be considered, such as pre-consumer recyclates, materials from chemical recycling and bio-based materials. We strongly recommend including all waste streams, e.g. workshop waste and waste from vehicle production.
All targets should be reviewed over time, depending on the availability of recycled plastics on the market.
Like the Batteries Regulation (EU 2023/1542, Art. 8) and the draft Packaging Regulation (Proposal for a Regulation on Packaging and Packaging Waste, COM (2022)0677, Art. 7.9 and 7.10), an exception and a review clause should be introduced to allow the Commission to review and modify the target in case of non-availability of recycled material.
In summary, we propose the following timeline for the recycled plastic content requirement:
- Implementing Act establishing the methodology for calculating recycled content within EIF + 23 months;
- European Commission assessment of recycled plastic availability by 31 December 2028;
- Implementation of minimum recycled content target by EIF + 72 months

Article 6(3) – Minimum recycled content in vehicles - Aluminium	
Text proposed by the Hungarian PSY	*Amendment*

The Commission is empowered to adopt delegated acts, in accordance with Article 50, to supplement this Regulation by establishing a minimum share of steel recycled from post-consumer steel waste to be present and incorporated into vehicle types to be type-approved in accordance with this Regulation and Regulation (EU) 2018/858.	The Commission is empowered to adopt ~~delegated~~ **implementing** acts, in accordance with Article 50, to supplement this Regulation by establishing a minimum share of steel recycled from post-consumer steel waste to be present and incorporated into vehicle types to be type-approved in accordance with this Regulation and Regulation (EU) 2018/858. ***Steel used as reinforcement materials in tyres shall not be considered within the scope of this delegated act.***
The minimum share of recycled steel referred to in the first subparagraph shall be based on a feasibility study, carried out by the Commission. The study shall be finalised by [OP: Please insert the date = the last day of the month following 23 months after the date of entry into force of this Regulation], looking in particular at the following aspects:	The minimum share of recycled steel referred to in the first subparagraph shall be based on a feasibility study, carried out by the Commission**, which shall include adequate consultation and involvement of the relevant industry stakeholders**. The study shall be finalised by [OP: Please insert the date = the last day of the month following 23 months after the date of entry into force of this Regulation], looking in particular at the following aspects:
(a) the current and forecasted availability of steel recycled from post-consumer sources of steel waste;	(a) the current and forecasted availability of steel recycled from post-consumer sources of steel waste;
(b) the current share of post-consumer waste in various steel semi-products and intermediates used in vehicles	(b) the current share of post-consumer waste in various steel semi-products and intermediates used in vehicles
(c) the potential uptake of post-consumer recycled steel by manufacturers in vehicles to be type-approved in the future;	(c) the potential uptake of post-consumer recycled steel by manufacturers in vehicles to be type-approved in the future;
(d) the relative demand of the automotive sector in comparison to the demand for post-consumer steel waste of other sectors;	(d) the relative demand of the automotive sector in comparison to the demand for post-consumer steel waste of other sectors;
(e) economic viability, technical and scientific progress, including changes in the availability of recycling technologies concerning steel recycling rates;	(e) economic viability, technical and scientific progress, including changes in the availability of recycling technologies concerning steel recycling rates **and the transformations resulting from the decarbonisation pathway, both in the steel and automotive industries**;
(f) the contribution of a minimum share of recycled content of steel in vehicles to the Union's open strategic autonomy, climate and environmental objectives;	(f) the contribution of a minimum share of recycled content of steel in vehicles to the Union's open strategic autonomy, climate and environmental objectives;
(g) the need to prevent disproportionate negative impacts on the affordability of vehicles; and	(g) the need to prevent disproportionate negative impacts on the affordability of vehicles; ~~and~~
(h) the influence on the overall costs and competitiveness of the automotive sector.	(h) the influence on the overall costs and competitiveness of the automotive sector; **and**
	(i) the specific characteristics and differentiated requirements of steel products intended for incorporation into vehicles.
The Commission may adopt an implementing act establishing the methodology for the calculation and verification of the share of steel recycled from post-consumer steel waste present in and incorporated into vehicle types.	The Commission may adopt an implementing act establishing the methodology for the calculation and verification of the share of steel recycled from post-consumer steel waste present in and incorporated into vehicle types.
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article	Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 51(2).

51(2).	**[The weight of the steel contained in each vehicle and the weight of recycled steel referred to in the first subparagraph shall exclude reinforcement material in tires.]**

Comment:

With regard to the minimum recycled steel content in vehicles, it is considered appropriate that the envisaged delegated act, which it is hoped will be replaced by an implementing act, should be preceded by an in-depth feasibility study, which should also take into account the characteristics and requirements of steel products to be incorporated into vehicles. The study, which should provide for adequate involvement of the sector, should also take into account technological evolution and changes due to the decarbonisation path, both in the steel and automotive sectors. There should also be an exemption for steel used as reinforcement material in tyres.

We believe that the same approach should be maintained for reinforcing steel in tyres as for the exclusion of thermosets and elastomers that make up tyre rubbers from the minimum recycled requirements.

Article 6(5)new - Design to enable removal and replacement of certain parts and components in vehicles	
Text proposed by the Hungarian PSY	*Amendment*
	6(5)new. All End-of-Life vehicle parts and components removed for replacement during the use-phase of a vehicle shall account to the post-consumer plastic waste as feedstock for recycled plastics.

Comment: Recycled plastics from waste vehicle parts and components generated by the replacement during the use phase of a vehicle should contribute to the percentage of recycled plastics from end-of-life vehicles as these parts and components are delivered pursuant to Art. 23(2)(c), by the undertakings carrying out car repair activities, to the same facilities that treat end-of-life vehicles and therefore managed together with the other plastic components fitted to the end-of-life vehicle.

Article 7(2) – Design to enable removal and replacement of certain parts and components in vehicles	
Text proposed by the Hungarian PSY	*Amendment*
Each vehicle belonging to a vehicle type that is type-approved as of [OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of this Regulation] under Regulation (EU) 2018/858 shall be designed, as regards joining, fastening and sealing elements, so as to enable, in a readily and non-destructive manner, 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.	Each vehicle belonging to a **new** vehicle type that is type-approved as of [OP: Please insert the date = the first day of the month following 72 months after the date of entry into force of this Regulation] under Regulation (EU) 2018/858 shall be designed, as regards joining, fastening and sealing elements, so as to enable, in a readily and non-destructive manner, the removal and replacement of electric vehicle batteries and e-drive motors from the vehicle by authorised treatment facilities or **authorized** repair and maintenance operators during the use phase and waste phase of the vehicle**,** ***where technically feasible, reasonable and proportionate.***

Comment:

Removal obligations must always be technically feasible and must be reasonable and proportionate in accordance with recital 42 of the Battery Regulation. Non-destructive removal must not apply to removal for recycling and must only apply to removal for re-use, refurbishment or remanufacture. All operators must be authorised.

Article 9 – Circularity strategy	
Text proposed by the Hungarian PSY	*Amendment*
1. For each vehicle **category in which a manufacturer produced vehicles** type-approved under Regulation (EU) 2018/858 as of [OP: Please insert the date = the first day of the month following 36 months after the date of entry into force of this Regulation], the manufacturer shall draw up **and implement** a circularity strategy, **in order to make available its comprehensive plan for circularity for the upcoming five years. With respect to paragraphs 3 and 4 of Part A of Annex IV, the strategy shall include type-specific information for the vehicle type concerned.**	1. ~~**For each vehicle type that is type-approved under Regulation (EU) 2018/858 as of**~~ **Vehicle manufacturers shall** as of [OP: Please insert the date = the first day of the month following 36 months after the date of entry into force of this Regulation], ~~the manufacturer shall~~ draw up and implement a **company** circularity strategy, ~~in order to make available its comprehensive plan for circularity~~ for the upcoming five years **limited to the areas under the direct control of the manufacturer**. The strategy shall include vehicle type-specific information as set out in paragraphs 3 and 4 of Part A of Annex IV.'
2. The circularity strategy shall describe which actions the manufacturers will take to follow-up on their obligations to ensure that the circularity requirements in Chapter II, which are verified in the type-approval procedures and which are applicable to the vehicle category concerned, are met.	2. The circularity strategy shall describe which actions the manufacturers will take to follow-up on their obligations to ensure that the circularity requirements in Chapter II, which are verified in the type-approval procedures and which are applicable to the vehicle category concerned, are met. **Actions which fall outside the direct control of the manufacturer are excluded from the scope of the strategy.**
3. […]	3. […]
4. […]	4. […]
5. The manufacturer shall monitor and follow up on the actions contained in the circularity strategy and update the strategy every five years in accordance with Part B of Annex IV. The updated circularity strategy shall be provided to the type-approval authority that issued the type-approval for a vehicle in the category concerned and to the Commisssion.	5. The manufacturer shall monitor and follow up on the actions contained in the circularity strategy and update the strategy every five years in accordance with Part B of Annex IV. ~~The updated circularity strategy shall be provided to the type-approval authority that issued the type-approval for a vehicle in the category concerned and to the Commisssion~~. **When updating the strategy, the manufacturer may include recommendations and guidelines for other actors involved in the reuse, recycling and recovery chain, so as to foster a collaborative approach.'**
6. The Commission shall make the circularity strategies and any updates to those strategies publicly available, except for confidential information.	6. The Commission shall make the circularity strategies and any updates to those strategies publicly available, except for confidential ~~information~~**, strategic or commercial information, which must be clearly identified by the manufacturer.**

Comment:

In principle, the circularity strategy to be effective should consider the whole company and the respective product portfolio. However, it is not correct to consider the manufacturer as solely responsible for a strategy that would require information on recycling technologies, their improvement and implementation, the monitoring of reuse, recycling and recovery practices of parts and components (in particular, see points 5, 6 and 7 of Annex IV, part A). These activities fall outside the sphere of competence and responsibility of the manufacturer, as they are managed by multiple operators, located in different countries and with different levels of expertise, infrastructure and traceability systems.

Article 10 - *Declaration on recycled content present in vehicles*

Text proposed by the Hungarian PSY	*Amendment*
1. Manufacturers shall declare, for each vehicle type that is type-approved as of [*OP: Please insert the date* = the first day of the month following ~~***36***~~ **12** months after the ~~***entry into force of the Regulation***~~ **adoption of the implementing act establishing the methodology for the calculation and verification of the share of the materials recycled from post-consumer waste in vehicle types, as referred to in Article 6 (~~*4*~~ 5)**] under Regulation (EU) 2018/858, the respective share of recycled content of: (a) neodymium, dysprosium, praseodymium, terbium, samarium, **nickel, cobalt** boron in permanent magnets in e-drive motors; (b) aluminium and its alloys; (c) magnesium and its alloys; (d) steel. The declaration shall concern the recycled content of these materials present in the vehicle type and indicate, per material share, whether the material is recycled from pre-consumer waste or from post-consumer waste.	**1. 36 months after the entry into force of the implementing act establishing the methodology for the calculation of recycled content present in vehicles,** manufacturers shall declare, for each **new** vehicle type that is type-approved as of [EIF + 36 months] under Regulation (EU) 2018/858, the respective share of recycled content of: (a) neodymium, dysprosium, praseodymium, terbium, samarium, ~~**nickel, cobalt**~~, boron in permanent magnets in e-drive motors; (b) aluminium and its alloys; (c) magnesium and its alloys; (d) steel. The declaration shall concern the recycled content of these materials present in the vehicle type and indicate, per material share, whether the material is recycled from pre-consumer waste or from post-consumer waste.

Comment:

- "for each new vehicle …": the amendment clarifies that recycled content declarations refer only to new type-approved vehicle models and thus not to all vehicles that are type-approved on the date of entry into force of the provision.
- It is considered appropriate to postpone the start of the obligation so as to allow the industry to comply with the implementing act.

Article 11 - *Information on removal and replacement of parts, components and materials present in vehicles*

Text proposed by the Hungarian PSY	*Amendment*

1. From [OP: Please insert the date = the first day of the month following 36 months after the date of entry into force of this Regulation], manufacturers shall provide waste management operators and repair and maintenance operators unrestricted, standardised and non-discriminatory access to the information listed in Annex V, enabling access to, and safe removal and replacement of, the following: (~~*a) electric vehicle batteries incorporated in the vehicle;*~~ ~~*(b) e-drive motors incorporated in the vehicle;*~~ (c) parts, components and materials which contain the fluids and liquids listed in Part B of Annex VII and which are contained in vehicles; (d) parts and components listed in Part C of Annex VII contained in vehicles; (e) parts and components, containing the critical raw materials as referred to in ~~*Article 27(1), point (b)*~~ **Article 28(1) point (b)** of Regulation (EU) **2024/1252** at the time of the type-approval of the vehicle; (f) digitally coded components and parts in a vehicle, where such coding prevents their repair, maintenance or replacement in another vehicle.	1. From [OP: Please insert the date = the first day of the month following 36 months after the date of entry into force of this Regulation], manufacturers shall provide waste management operators and repair and maintenance operators unrestricted, standardised and non-discriminatory access to the information listed in Annex V, enabling access to, and safe removal and replacement of, the following: **(a) Electric vehicle batteries incorporated in the vehicle, according to Regulation 2023/1542;** **(b) E-drive motors incorporated in the vehicle, according to Regulation 2023/1542;**
Comment: We consider that manufacturers should provide waste management operators and repair and maintenance operators the information required by Regulation 2023/1542 to ensure the safe removal and replacement of batteries and e-drives incorporated in electric vehicles.	

Article 12(2) - ***Labelling of parts, components and materials present in vehicles***	
Text proposed by the Hungarian PSY	*Amendment*
2. **By 24 May 2029, ~~M~~m**anufacturers shall ensure that ~~*e-drive motors*~~ **vehicle parts and components** containing permanent magnets bear a conspicuous, clearly legible and indelible label indicating the information ~~*listed*~~ in **accordance of Article 28 of Regulation (EU) 2024/1252**.~~*point 4 of Annex VI.*~~	(2). **From [OP: Please insert the date = the first day of the month following 36 months after the date of entry into force of this Regulation],** manufacturers shall ensure that e-drive motors containing permanent magnets bear a conspicuous, clearly legible and indelible label indicating the information listed in point 4 of Annex VI.

Article 13 – Digital Circularity Vechile Passport	
Text proposed by the Hungarian PSY	***Amendment***

From [*OP: please insert a date = the first day of the month following **84** **72** months after entry into force of the Regulation*] each vehicle placed on the market shall have a **digital** circularity vehicle passport, which shall be aligned with and, where possible, integrated in other vehicle related environmental passports established under Union law.	**For new vehicle types approved** from [*OP: please insert a date = the first day of the month following **84** ~~72~~ months after entry into force of the Regulation*] each vehicle **type** ~~placed on the market~~ shall have a circularity vehicle passport, which shall be ~~aligned with and, where possible, integrated~~ **interoperable with** ~~in~~ other vehicle related environmental passports established under Union law.
2. (…)	
3. The manufacturer placing the vehicle on the market shall ensure that the information in the **digital** circular**ity** vehicle passport is accurate, complete and up to date.	**(3):** The manufacturer placing the vehicle on the market shall ensure that the information in the circular vehicle passport is accurate, and complete ~~and up to date~~ **at the time of placing the vehicle on the market**.
4. (…)	
5. The **digital** circularity vehicle passport of a vehicle that has become an end-of-life vehicle shall cease to exist at the earliest 6 months after the certificate of destruction for that end-of-life vehicle was issued.	(5): The circularity vehicle passport of a vehicle that has become an end-of-life vehicles **or legally exported from the EU** shall cease to exist at the earliest 6 months after the certificate of **export or** destruction for that end-of-life vehicle was issued.
6. The Commission shall adopt implementing acts laying down rules on the following:	(6): When laying down the rules referred to in the first subparagraph, the Commission shall take into account the need to ensure a high level of security and privacy, **including restricting direct access to a vehicle's operating data.**
(a) the manner and technical specification of the solution to be used for accessing the **digital** circularity vehicle passport;	
(b) the technical design and operation requirements for the **digital** circularity vehicle passport, including rules on:	
(i) the **alignement** and interoperability of the **digital** circularity vehicle passport with other passports **and certificates** required by Union legislation, **as refered in paragraph 1 of this Article**;	
(ii) the storage and processing of information included in the **digital** circularity vehicle passport;	
(iii) the availability of the **digital** circularity vehicle passport after the manufacturer responsible for the fulfilment of the obligations set out in paragraph 3 ceases to exist or ceases its activity in the Union;	
(c) the introduction, modification and updating of information included in the **digital** circularity vehicle passport by third parties other than the manufacturer;	
(d) the location of the data carrier or other identifier enabling access to the **digital** circularity vehicle passport of the vehicle.	
When laying down the rules referred to in the first subparagraph, the Commission shall take into account the need to ensure a high level of security and privacy.	
The implementing acts referred to in the first subparagraph of this Article shall be adopted in accordance with the	

examination procedure referred to in Article 51(2).	

Comment: The manufacturer's responsibility must be limited to the production of the vehicle, as the other stages are beyond its control. The possibility of using IDIS (International Dismantling Information System), an advanced, comprehensive and already existing system, must be included.

Article - 15 - Authorised treatment facilities	
Text proposed by the Hungarian PSY	*Amendment*
3a. Member States may adopt measures to require that producers or, where appointed in accordance with Article 17(1), producer responsibility organisations shall conclude contracts with authorised treatment facilities for the purposes of implementing their producer responsibility obligations.	3a. ~~Member States may adopt measures to require that~~ Producers or, where appointed in accordance with Article 17(1), producer responsibility organisations, **may** conclude **adequate** contracts with authorised treatment facilities for the purposes of implementing their producer responsibility obligations. **Such contracts shall be based on a model contract established by the Member State with detailed requirements to ensure appropriate, transparent and non-discriminatory terms and conditions.**
5. The Commission shall, by [OP: please enter the date = the last day of the month following 24 months after the date of entry into force of this Regulation], adopt an implementing act in accordance with Article 51(2) to establish the necessary criteria for the contracts referred to in paragraph 3a, in order to ensure a fair balance of power between the contracting entities. That implementing act shall be adopted in accordance with the examination procedure referred to in Article 51(2).	~~5. The Commission shall, by [OP: please enter the date = the last day of the month following 24 months after the date of entry into force of this Regulation], adopt an implementing act in accordance with Article 51(2) to establish the necessary criteria for the contracts referred to in paragraph 3a, in order to ensure a fair balance of power between the contracting entities. That implementing act shall be adopted in accordance with the examination procedure referred to in Article 51(2).~~

Comment: We do not believe that a contract between producer and ATF is essential to allow the latter to freely exercise its activities, for which it has been authorised by the competent national authority. The choice of joining or not joining a PRO should be left exclusively to the producer - who bears the costs of the EPR system and on whom the obligations fall - who is able to maximise the potential of one or the other solution in each Member State.

Article 17 - Producer Responsibility Organisation	
Text proposed by the Hungarian PSY	*Amendment*

1. Producers may choose to fulfil their extended producer responsibility obligations either individually or may entrust a producer responsibility organisation authorised in accordance with Article ~~*19*~~ **18** to fulfill the extended producer responsibility obligations on their behalf. **Member States may adopt measures to require that producers entrust a producer responsibility organisation to fulfil their extended responsibility obligations laid down in Article 16.**	1. Producers may choose to fulfil their extended producer responsibility obligations either individually or may entrust a producer responsibility organisation authorised in accordance with Article ~~*19*~~ **18** to fulfill the extended producer responsibility obligations on their behalf. ~~**Member States may adopt measures to require that producers entrust a producer responsibility organisation to fulfil their extended responsibility obligations laid down in Article 16.**~~
4. Producer responsibility organisations shall ~~ensure a fair representation of producers and waste management operators in their governing bodies~~ regular dialogue between stakeholders according to Article 8.a. paragraph 6 of Directive 2008/98/EC.	**(4):** Producer responsibility organisations shall ensure a ~~**fair**~~ **adequate** representation of producers and waste management operators in their governing bodies.
Comment: With respect to stakeholder involvement in PROs, we prefer to maintain the previous wording, ensuring an - albeit unequal - representation of waste producers and waste managers in the governing bodies of PROs.	

Article 20 - *Financial responsibility of producers*	
Text proposed by the Hungarian PSY	*Amendment*
1. The financial contributions paid by the producer shall cover the following costs related to the vehicles that the producer makes available on the market: (a) the costs of the collection of end-of-life vehicles, **including those for which the producer cannot be identified or ceased to exist,** that is necessary to meet the requirements in Articles 23 to 26 and of **their subsequent transport, and** the costs of the treatment of end-of-life vehicles that is necessary to meet the requirements in Articles 27 to ~~*30*~~ **31**, 34 **and,** ~~*35*~~ **36**, provided that, ~~***are not covered by the pursuant to Article 8.a, paragraph 4, points (a) to (c) of Directive 2008/98/EC, they take into account***~~ **the** revenues of waste management operators linked to the sales of used spare parts and used spare components, of depolluted end-of-life vehicles, or of secondary raw materials recycled from end-of-life vehicles; ~~(b) *the costs of conducting awareness raising campaigns aimed to improve collection of end-of-life vehicles;*~~ (c) the costs of establishing notification system referred to in Article 25. ~~(d) *the costs of data gathering and reporting to the competent authorities.*~~	**(1):** The financial contributions paid by the producer shall cover the following costs related to the vehicles that the producer makes available on the market: **(a):** the costs for the **contracted waste management operators** of the collection of end-of-life vehicles that **are** necessary to meet the requirements in Articles 23 to 26 and ~~the costs~~ of the treatment of end-of-life vehicles that **are** necessary to meet the requirements in Articles 27 to 30, 34 and 35, provided that they are not covered by the revenues of waste management operators linked to the sales of used spare parts and used spare components, of depolluted end-of-life vehicles, or of secondary raw materials recycled from end-of-life vehicles; b) the costs of conducting awareness raising campaigns aimed to improve collection of end-of-life vehicles; ~~**(c) the costs of establishing notification system referred to in Article 25;**~~ (d) the costs of data gathering and reporting to the competent authorities. **(2):** ~~**The competent authority shall, in close cooperation with producers, producer responsibility organisations and waste management operators, monitor:**~~ ~~**(a) the average costs of collection, recycling and treatment operations and the revenues of waste management operators;**~~ ~~**(b) the level of financial contributions to be paid by the**

[…….]	~~**producers to the producer responsibility organisations appointed in the case of collective fulfilment of extended producer responsibility obligations so that the costs are fairly allocated between all interested operators.**~~
4. In the case of individual fulfilment of extended producer responsibility obligations, the producers shall provide a guarantee for vehicles that they make available on the market for the first time in the territory of a Member State. That guarantee shall ensure that the operations referred to in paragraph 1 relating to those vehicles will be financed. The amount of the guarantee shall be determined by the Member States in which the vehicle has been made available on the market for the first time taking into account criteria laid down in Article 21. The guarantee may take the form of participation by the producer in appropriate schemes for the financing of the management of end-of-life vehicles, ~~*a recycling insurance or a blocked bank account*~~ **a financial guarantee or equivalent insurance**.	**(4):** In the case of individual fulfilment of extended producer responsibility obligations, the producers shall provide a guarantee for vehicles that they make available on the market for the first time in the territory of a Member State. That guarantee shall ensure that the operations referred to in paragraph 1 relating to those vehicles will be financed. The amount of the guarantee shall ~~**be determined by the Member States in which the vehicle has been made available on the market for the first time taking into account criteria laid down in Article 21**~~ **cover the projected costs of managing ELV placed on the market of the Member State for 1 year from the date of its authorization.** The guarantee may take the form of participation by the producer in appropriate schemes for the financing of the management of end-of-life vehicles, ~~**a recycling insurance or a blocked bank account**~~ **a financial guarantee or equivalent insurance.**
5. In the case of a state-run producer responsibility organisation, such guarantee may take the form of a public fund that is financed by producers' fees and for which the Member State running the organisation is jointly and severally liable.	

Article 2 3 - Collection of end-of-life vehicles	
Text proposed by the Hungarian PSY	*Amendment*
5. The **collection points** ~~waste management operators, including authorised treatment facilities,~~ shall issue a document in electronic format, confirming receipt of an end-of-life vehicle, to the vehicle owner, and provide it through an electronic notification procedure established in accordance with Article 25(2) to the relevant authorities of the Member State, including the competent authorities designated under Article 14.	5. The **collection points** shall issue a **free of charge** document in electronic format, confirming receipt of an end-of-life vehicle to the vehicle owner, **indicating the authorised treatment facility to which the vehicle will be sent for processing**. **The document should be provided** ~~and providing it~~ through an electronic notification procedure established in accordance with Article 25(2) to the relevant authorities of the Member State, including the competent authorities designated under Article 14.
Comment: We suggest to amend this paragraph in order to provide that the document to be issued by the collection point to the owner of the vehicle and to competent authorities shall include an indication of the ATF of destination.	

Annex VII – Part C - Mandatory Removal of Parts and Components from End-Of-Life Vehicles			
Text proposed by the Hungarian PSY		*Amendment*	
	xempted under Article 30 point 2, if the conditions of Annex VII Part G apply		**xempted under Article 30 point 2, if the conditions of Annex VII Part G apply**
1.a Electric vehicle batteries**, as defined in Article 3 point (141) of Regulation (EU) 2023/1542), including their battery management systems, onboard chargers *for EVs*, casing or housing if present**; **1.b LMT batteries, as defined in Article 3 point (11) of Regulation (EU) 2023/1542), including their battery management systems, onboard chargers for EVs, casing or housing if present;**		1.a Electric vehicle batteries**, as defined in Article 3 point (141) of Regulation (EU) 2023/1542), including their battery management systems, onboard chargers *for EVs*, casing or housing if present**; **1.b LMT batteries, as defined in Article 3 point (11) of Regulation (EU) 2023/1542), including their battery management systems, onboard chargers for EVs, casing or housing if present;**	
~~*3*~~**2**. SLI batteries as defined in Article 3, point (12), of Regulation (EU) 2023/**1542 and other batteries as defined in Article 3, point (9) of Regulation (EU) 2023/1542** ~~****[on batteries and waste batteries]~~;		~~*3*~~**2**. SLI batteries as defined in Article 3, point (12), of Regulation (EU) 2023/**1542 and other batteries as defined in Article 3, point (9) of Regulation (EU) 2023/1542** ~~****[on batteries and waste batteries]~~;	
~~*2*~~**3**. E-drive motors, including their casings, **generators, alternators and cooling fan motors if present,** ~~and any associated *control units, wiring, and other parts, components and materials directly fastened or attached to E-drive motors;*~~;		~~*2*~~**3**. E-drive motors, including their casings, **generators, alternators and cooling fan motors if present,** ~~and any associated *control units, wiring, and other parts, components and materials directly fastened or attached to E-drive motors;*~~;	
4. **Combustion** engines **blocks** ~~*with generators, starter, alternators, turbo-chargers, radiator and cooling fan motors and associated devices*~~;	**X**	4. ~~**Combustion** engines **blocks** *with generators, starter, alternators, turbo-chargers, radiator and cooling fan motors and associated devices*;~~	**X**
5. Catalytic converters;		~~5~~. Catalytic converters;	
6. Gear boxes**, including control units**;	**X** **In case of exemption, No. 20 all apply to the control unit**	6. ~~Gear boxes**, including control units**;~~	**X** **In case of exemption, No. 20 all apply to the control unit**
7. **At least 70% of the total glass from** windshields, rear and side windows made of glass**, including rooftop glass installations**;		~~7.~~ **At least 50~~70~~% of the total glass from** windshields, rear and side windows made of glass**, including rooftop glass installations**;	
8. ~~Wheels~~ **Rims**;		~~8.~~ ~~Wheels~~ **Rims**;	
9. **Rubber** tyres;		~~9.~~ **Rubber** tyres;	
10. ~~Dashboards~~;		10. ~~Dashboards~~;	

11. Directly accessible parts of the infotainment system, ~~including sound, navigation,~~ **~~including radar or lidar control units and sensors if present,~~** ~~and multimedia controllers, including displays of a surface greater than 100 square centimetres;~~		~~11. Directly accessible parts of the infotainment system, including sound, navigation,~~ **~~including radar or lidar control units and sensors if present,~~** ~~and multimedia controllers, including displays of a surface greater than 100 square centimetres;~~	
12. Head~~-~~ **and tail**lights, including their actuators;	**X**	~~12. Head- and taillights, including their actuators;~~	~~**X**~~
13. ~~**Main**~~ wire harnesses~~**, including internal and external charging cables if present**~~;	**X**	~~13.~~ ~~**Main**~~ wire harnesses~~**, including internal and external charging cables if present**~~;	**X**
~~14. **Crash management system, including**~~ bumpers ~~**covers, beams and crash boxes**~~; **14. Bumpers**	**X**	~~14. **Crash management system, including**~~ bumpers ~~**covers, beams and crash boxes**~~; ~~**14.**~~ **Bumpers**	**X**
~~15. Fluid containers;~~ **Plastic fuel tanks**		~~15. Fluid containers;~~ **Plastic fuel tanks**	
16. Heat exchangers;		~~16. Heat exchangers;~~	
~~17. Any other mono-material metal components, heavier than 10 kg;~~		~~17. Any other mono-material metal components, heavier than 10 kg;~~	
~~18. Any other mono-material plastic components, heavier than 10 kg;~~		~~18. Any other mono-material plastic components, heavier than 10 kg;~~	
19. Electrical and electronic components: (a) inverters **and DC-DC converters with electric voltage above 24V or a weight above 1 kilogram** of ~~the~~ electric vehicles; (b) printed circuit boards with a surface area, larger than 10 ~~cm2~~ **square centimetres**; (c) photo-voltaic (PV) panels with a surface area, larger than 0.2 ~~m2~~ **square metres**; (d) control modules and valve boxes for the automatic transmission~~.~~**;** **(e) oxygen, radar and lidar sensors if present.**		~~19.~~ **20.** Electrical and electronic components: ~~(a) inverters and DC-DC converters with electric voltage above~~ **~~of at least~~** 24V or a ~~weight above 1 kilogram of the electric vehicles;~~ ~~(~~(b) printed circuit **contained** boards with **a surface area, larger than 10 ~~cm2~~ square centimetres particularly high precious metal content;** (c) photo-voltaic (PV) panels with a surface area, larger than 0.2 ~~m2~~ **square metres**; ~~(d) control modules and valve boxes for the automatic transmission.;~~ ~~**(e) oxygen, radar and lidar sensors if present.**~~	
		~~**21. E-call system**~~	

Comment:

The removal of parts and components for reuse, remanufacturing and recycling must represent the best solution from an environmental point of view (toxicity, CO2 footprint, durability, etc.) and cannot disregard the actual market demand for the part or component removed for reuse or/and recycling.