

Brussels, 17 November 2025

Joint Statement

Driving Circularity in the Automotive Sector: Ensuring Ambitious Targets and Rules Equivalence in the ELV Regulation

As interinstitutional negotiations on the proposed **End-of-Life Vehicles Regulation (ELVR)** advance, the undersigned organisations call on EU institutions to uphold the Regulation's ambition by **maintaining strong recycled content targets, ensuring domestic demand for EU-made recyclates, and introducing a robust mirror clause** to ensure full equivalence of rules between EU and non-EU operators.

Upholding ambitious requirements for recycled plastics represents a critical opportunity to accelerate circularity and stimulate investment in the recycling sector. Weakening the original 25% recycled plastic content target, as well as the 25% closed-loop target, would compromise these objectives. Likewise, extending the implementation period to 120 months would undermine investor confidence and delay the deployment of essential recycling technologies and infrastructure, ultimately hampering material recovery and increasing reliance on energy recovery and landfilling.

Securing domestic demand for EU¹-made recyclates is essential. To this end, the undersigned organisations call for the introduction of **EU-made minimum recycled content requirements for vehicles manufactured within the EU**. Specifically, for vehicles, parts, and components produced in the EU, the recycled content obligation should be fulfilled using post-consumer plastic waste that has been collected and recycled within the EU. This approach, complemented by measures to address the existing price gap between recycled and virgin materials, will catalyse investment in domestic recycling capacity, ensure predictable demand, and reduce the EU's dependence on imported recycled polymers.

Moreover, **temporary derogations from the minimum recycled content requirements for plastics in vehicles should be avoided**. Allowing such exemptions would compromise the core objectives of the Regulation and discourage essential scaling up of recycling capacity and innovation. In particular, granting exceptions based on claims of limited supply or high prices of recycled plastics would inevitably create legal ambiguity and loopholes that weaken the Regulation's effectiveness and certainty.

The "*post-consumer waste*" definition must also be considered carefully, particularly if post-consumer plastic waste collected or recycled outside the EU is counted toward the recycled content targets under Article 6. In this context, a **strong mirror clause** is indispensable to ensure the equivalence of rules for third countries, guaranteeing that imports comply with the same environmental, traceability, and quality standards required within the EU. Imports of both virgin and recycled polymers continue to rise, with July 2025 marking the largest polymer trade deficit ever recorded². Ensuring a level playing field through equivalent rules is therefore vital to safeguard the competitiveness of EU plastics recyclers.

Importantly, **the design of the mirror clause must avoid unintended consequences for EU recyclers**, particularly any duplication of requirements already covered under existing EU legislation. The goal should be clear: ensuring full equivalence of rules for third-country operators, without imposing unnecessary administrative burdens. In this context, it is essential to distinguish between audits applied to all companies declaring recycled content and the mirror clause, which specifically aims to ensure that recycled content

¹ For the purposes of this statement, "EU" includes EFTA countries and the UK.

² Eurostat

produced outside the EU meets EU-equivalent standards. This distinction can help prevent EU installations from facing a double set of verification requirements for health, climate, and environmental protection that are already established under EU law and adhered to by EU companies.

The undersigned organisations urge EU institutions to **uphold the ELV Regulation's ambitious targets, promote EU-made recyclates**, and implement a robust mirror clause that guarantees **full equivalence for non-EU operators**. Maintaining high-quality recycling through a level playing field, alongside ambitious recycled content targets, is essential for strengthening the EU's competitiveness and advancing regulatory simplification - both critical components of the EU's long-term strategy for sustainable industrial growth and a resilient circular economy.

The signatories



FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 20 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year.



Plastics Recyclers Europe (PRE) is an organisation representing the voice of the European plastics recyclers who reprocess plastic waste into high-quality material destined for the production of new articles. Recyclers are important facilitators of the circularity of plastics and the transition towards the circular economy.

Plastics recycling in Europe is a rapidly growing industry representing over €9.1 billion in turnover, 13.2 million tonnes of installed recycling capacity, around 850 recycling facilities and over 30.000 employees.



Recycling Europe (formerly EuRIC) is the voice of Europe's recycling industry, including 80 national federations and companies across 24 EU & EFTA countries. From metals and paper to plastics, textiles, tyres, ships, construction & demolition waste and WEEE, our members transform waste into resources—powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness and sustainable industrialisation across the continent.