

To all Stakeholders of APRA Europe AISBL

The Chairman of APRA Europe
Dr. Daniel C. F. Koehler

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Official Statement and Industry Call to Action on the ELV-R Proposal and Its Impact on Automotive Remanufacturing

Dear Stakeholders,

On 16 September 2025, the Council of the European Union published a comparative document—commonly referred to as the "four-column table"—outlining the positions of the European Commission, the European Parliament (EP), and the Council on the proposed revision of the End-of-Life Vehicles Regulation (ELV-R).

While several amendments proposed by automotive industry associations have been adopted, particularly in the area of remanufacturing, the revised text introduces increased complexity without resolving critical misunderstandings about the nature and processes of automotive remanufacturing. As it stands, key requirements in the proposal are technically unfeasible and, if enforced, would render automotive remanufacturing economically and operationally non-viable within 36 months of the regulation's entry into force.

We urge immediate and coordinated communication of these concerns to relevant stakeholders within the European Commission, the European Parliament, and the Council. The following points highlight the most pressing issues:

1. Redefinition of Waste Increases Workshop Burden

- **Issue:** The EP Mandate's Recital (58) redefines waste as any part dismantled from a vehicle without the intention of reuse, remanufacturing, or refurbishment. This deviates from the established waste legislation, which defines waste based on the intention of disposal by the holder.
- **Impact:** This change would significantly increase the volume of parts classified as waste in automotive workshops, leading to unnecessary disposal and environmental burden.
- **Request:** Retain the existing waste definition as outlined in current waste legislation.

2. Unrealistic Requirements for Core Handling and Shipment

- **Issue A:** The Council Mandate's Recital (58) requires dismantlers to clean and functionally test cores before shipping them to remanufacturers.

- **Impact:** This imposes disproportionate infrastructure and cost burdens on dismantlers, reducing the availability of cores for remanufacturing.
- **Request:** Remove the requirement for cleaning and functional testing of cores intended for remanufacturing.
- **Issue B:** Article 31(3a) of the Council Mandate mandates that used parts can only be shipped with documentation from an “authorised treatment facility” (ATF), defined as facilities handling end-of-life vehicles.
 - **Impact:** This excludes parts from vehicles still in use (e.g., from workshops), contradicting other sections of the proposal.
 - **Request:** Remove this restriction for parts intended for remanufacturing.

3. Misunderstanding of Remanufacturing Processes and Labeling Requirements

- **Issue A:** Recital (59) requires remanufactured parts to be labeled with the Vehicle Identification Number (VIN) of the original vehicle.
 - **Impact:** Remanufactured parts are typically assembled from used components, from used parts sourced from multiple vehicles, making VIN-specific labeling unfeasible.
 - **Request:** Limit labeling to include the remanufacturer’s name, country of origin, and a clear indication that the part is remanufactured.
- **Issue B:** Article 32 mandates labeling of remanufactured Parts that includes the VIN and contact details of the original dismantler.
 - **Impact:** This is technically unachievable and raises data protection concerns by potentially disclosing personal information.
 - **Request:** Align labeling requirements with industry practice— only the remanufacturer’s name, country of origin, and remanufactured status.
- **Issue C:** Article 3(1)(28) defines remanufactured parts as requiring a “at least one substantial change” from the original part.
 - **Impact:** In the automotive sector, remanufactured parts must meet original specifications to maintain vehicle type approval. The current definition misrepresents the nature of remanufacturing.
 - **Request:** Remove the requirement for a “at least one substantial change” and define remanufactured parts as new parts built from one or more used components that meet original specifications.
- **Issue D:** The Council Mandate proposes removing the reference to “end-of-life vehicles” in the definition of remanufactured parts in Article 3 (1) point (28).
 - **Impact:** This contradicts Recital (58) and the broader understanding of parts sourcing from both in-use and end-of-life vehicles.
 - **Request:** Retain the reference to “end-of-life vehicles” in the definition.

4. Unjustified Restrictions on Parts Eligible for Remanufacturing

- **Issue:** Recital (60) proposes banning the reuse, remanufacture, or refurbishment of certain parts category.
 - **Impact:** Remanufactured parts are required to meet the same standards as new parts. Blanket restrictions are therefore unnecessary and counterproductive.
 - **Request:** Exclude remanufactured parts from the scope of Recital (60).

5. Unrealistic Obligations for Wholesalers

- **Issue:** Article 32(2) of the Council Mandate requires wholesalers to ensure the functionality of remanufactured parts.
 - **Impact:** This is impractical given the vast range of parts in the aftermarket and contradicts the industrial quality assurance processes already in place.
 - **Request:** Remove this requirement for remanufactured parts, as their functionality is already ensured by the remanufacturing process.

6. Equal playing field for all sustainable economic operators

- **Issue:** Recital (29) of the EP Mandate requests Article 32(2) of the Council Mandate request to provide information allowing only professional waste management operators and repair and maintenance operators to overcome the problems posed by these digitally coded parts and components in a vehicle.
 - **Impact:** This is excluding remanufacturer from relevant information's to offer sustainable products to the market.
 - **Request:** Extend this requirement to share also the relevant information's to Remanufacturer.

7. Efficient promotion of remanufacturing of parts

- **Issue:** Article 33(1b) of the Commission Proposal recommends capable incentives to promote the use of remanufactured parts. Where the proposals from the EP Mandate and the Council Mandate are not capable to support this target.
 - **Impact:** The proposal of EP Mandate and Council Mandate would not support the use of remanufactured parts.
 - **Request:** Stay with the Commission Proposal.

Conclusion

The current ELV-R proposal, if implemented without critical revisions, threatens the viability of automotive remanufacturing in Europe. This would not only undermine circular economy goals but also increase environmental impact and economic costs. We call on all stakeholders—within the Commission, the European Parliament, and the Council—to urgently address these concerns and work collaboratively with the industry to ensure a practical, sustainable, and future-proof regulatory framework.

THE VOICE OF REMANUFACTURING

We appreciate your active engagement and support in helping ensure that the ELV-R accurately reflects our industry's practices and contributions to sustainability and circular economy goals.

Sincerely,

A handwritten signature in blue ink, appearing to be 'D. Koehler', written in a cursive style.

Dr. Daniel C. F. Koehler
Chairman
APRA Europe