



Evaluation of the Vehicle End-of-Life (ELV) Directive

ACEM welcomes the evaluation of the [ELV Directive \(Directive 2000/53/EC\)](#) as an opportunity to engage with the EU and its Institutions regarding the commitment of our members towards the circular economy.

In this regard, ACEM encourages the European Commission to investigate the possibility of extending the scope of the ELV Directive to powered two-wheelers and to set-up sector-specific requirements for the industry, taking into account the following considerations.

Scope and legal considerations

“Powered two-wheeler” is a generic term that needs to be further clarified to ensure that the scope of the ELV Directive is clearly defined and to give legal certainty to market operators. It encompasses many diverse vehicles, primarily defined in the Type-Approval Regulation ([EU Regulation 168/2013](#)) as “L-category vehicles”. These include light two-wheel powered vehicles such as mopeds and motorcycles, as well as powered tricycles and light and heavy quadricycles.

The term “powered two-wheeler” may also include vehicles that are not intended for road use and/or are not covered by other EU Directives and Regulations, although in principle they share the same vehicle concepts. Please see the annex for more details on these vehicles.

Economic considerations

Manufacturers of powered two-wheelers are smaller undertakings when compared to passenger car manufacturers to which the current ELV Directive applies. Many of them are small and medium enterprises (SMEs) that will need

specific rules to be able to adapt to these new requirements. Taking this into account, the level of requirements for “powered two-wheelers” in a future reviewed Directive, should adequately reflect the situation of companies producing a limited number of vehicles.

In line with the principles of the circular economy, ACEM ultimately believes that collection and treatment operations should be beneficial and economically neutral.

Technical considerations

It is crucial to understand that the majority of powered two-wheeler manufacturers have no experience with the requirements set out in the current ELV Directive. As a result, a phase-in approach is needed to allow the industry to adapt, including the dismantling networks already operating in the car segment.

Sufficient lead time (of about one product cycle) is also needed for the industry to fully adapt and the sector at large to implement the necessary processes put in place at a national level.

Sector-specific requirements should be designed and exemptions should be made, to allow commitment to items such as recycling targets, material coding, fulfilment of material restriction requirements or for the provision of dismantling information.

Mandatory depollution requirements and a prohibition of re-using certain parts should also be established.

Finally, ACEM fully supports the principles behind sector-specific handling of material restrictions. The motorcycle industry is ready to engage in a constructive dialogue with the European Commission in order to define sector-specific conditions for powered two-wheelers, especially with regards to technical feasibility and the “repair-as-produced” principle for spare parts.

Background

As stated by the European Commission, end-of-life vehicles (ELVs) generate between 7 and 8 million tonnes of waste in the EU every year. These should be managed correctly. The European Directive on end-of-life vehicles ([Directive 2000/53/EC](#)) aims to make the dismantling and recycling of ELVs more environmentally friendly.

The ELV Directive sets clear quantified targets for the reuse, recycling and recovery of the ELVs and their components. It also pushes producers to manufacture new vehicles without hazardous substances (in particular lead, mercury, cadmium and hexavalent chromium), thus promoting the reuse, recyclability and recovery of waste vehicles, while providing the industry with specific exemptions to the prohibition of the use of hazardous substances in vehicles subject to regular reviews according to technical and scientific progress.

Taking into consideration that the motorcycle industry designs, produces, uses, distributes and discards products in Europe, all of which has important economic, societal and environmental implications, ACEM encourages the European Commission to investigate the possibility of extending the scope of the ELV Directive to powered two-wheelers and set-up sector-specific requirements for the industry.

Annex - The EU market and the classification of vehicles

Every year about 1.4 million powered two-wheelers are registered in the EU. The main motorcycle markets are Italy, France and Spain whilst the main markets for mopeds are France, the Netherlands, Germany, Belgium and Italy.

Most of the so-called “powered two-wheelers” (and other similar vehicles such as 3- and 4-wheels motor vehicles) are classified into categories in the Type Approval Regulation (EU) 168/2013, Annex I:

- Light two-wheel powered vehicles (L1e)
- Three-wheel mopeds (L2e)
- Two-wheel motorcycles (L3e)
- Two-wheel motorcycles with side-car (L4e)
- Powered tricycles (L5e)
- Light quadricycles (L6e)
- Heavy quadricycles (L7e)

Vehicles that fall outside the scope of EU Regulation 168/2013

Some vehicles that share similar elements and components with L-category vehicles are outside the scope of EU Regulation 168/2013.

- Off-road vehicles and vehicles intended for use by physically disabled people are covered by the Machinery Directive ([Directive 2006/42/EC](#)).
- Vehicles exclusively intended for sports competition are excluded from both the scope of the Machinery Directive and of the Type Approval Regulation ([EU Regulation 168/2013](#)).
- Vehicles used in agricultural and forestry activities such as all-terrain vehicles (ATVs) and Side-by-sides (SbS) belong to the so called “T-category” and are subject to a specific type approval regulation ([EU Regulation 167/2013](#)).

ABOUT ACEM

The European Association of Motorcycle Manufacturers (ACEM) represents manufacturers of mopeds, motorcycles, three-wheelers and quadricycles (L-category vehicles) in Europe.

ACEM members include 18 manufacturing companies: BMW Motorrad, Bombardier Recreational Products (BRP), Ducati Motor holding, Harley-Davidson, Honda, Kawasaki, KTM, KYMCO, MV Agusta, Peugeot Scooters, Piaggio, Polaris Industries, Quadro Vehicles, Renault, Royal Enfield, Suzuki, Triumph Motorcycles and Yamaha.

ACEM also represents 17 motorcycle industry associations in 15 different European countries. About 300,000 jobs depend on the L-category industry in Europe. There are about 35.3 million motorcycles and scooters on Europe’s roads (2015 figures).

To find out more about ACEM please visit www.acem.eu