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FERVER POSITION ON THE PROPOSED ELV Regulation

FERVER is the European Federation of Glass Recyclers. Our federation currently consists of 24 members spread across 13 EU- Member States and 3 other countries. They recycle around 70% of the packaging glass waste collected in Europe.

The European glass recyclers **warmly welcome** the publication of the **proposal for a Regulation of the European Parliament and of the Council** on circularity requirements for vehicle design and on management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2019/1020 and repealing Directives 2000/53/EC and 2005/64/EC.

FERVER supports and welcomes the choice for a regulation instead of a directive in order to harmonize legislation across the EU. In particular, FERVER welcomes the new rules included with the aim to ensure that exported vehicles are roadworthy and are not in fact ELV's as they will enable additional recycling of glass in end-of-life vehicles in the future.

FERVER strongly supports the future dismantling obligation contained in article 30 of the proposal for an ELV Regulation, **to dismantle the windshields, rear and side windows made of glass in end-of-life vehicles**. This will **considerably improve the quality of the recycled material glass**, as the same level of quality of glass material cannot be achieved after shredding and not even after post-shredding technologies. Furthermore, FERVER suggests adding also glass roofs to the dismantling obligation and to make it mandatory for the dismantled glass materials to be stored separately in clean storage places free of impurities in order to avoid severe quality problems.

The dismantling obligation of windshields **will also enable the recycling of the PVB-fraction**, which is layered in between the glass



This PVB-fraction is very promising for the future and studies are currently being conducted in this respect, e.g. under the Horizons Project Sunrise ([SUNRISE project | Efficient recycling of PVB material from laminated glass \(sunrise-project.eu\)](https://sunrise-project.eu)), in order to improve its quality. Such PVB fraction recycling can also not be achieved through post-shredding technologies.



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FERVER acknowledges that the aforementioned dismantling obligations can slightly increase costs at the level of the recyclers as the dismantling requires additional manual or mechanical handling. Such slight cost-increase can perfectly be supported via the EPR structure, as foreseen by this proposal and supported by FERVER.