



## Supporting a Sustainable Inclusion for Motorcycles in the End of Life Vehicles (ELV) Regulation

As ACEM, the European Association of Motorcycles Manufacturers, we recognize the importance of the EU Commission's initiative to revise the ELV Regulation and include L-category vehicles. The industry, aligned with the sustainability commitments taken in our Vision 2030+, welcomes the extension to L-category for:

### **Article 8 on “General Obligations”:**

To maintain both industry competitiveness and policy coherence, ACEM supports applying these provisions exclusively to new vehicle types, with a five-year lead time. This balanced approach ensures manufacturers have sufficient time to adapt their processes and align with the sustainability goals of the EU without facing undue burdens.

### **Article 11 on “Information on removal and replacement of parts”:**

ACEM supports the sharing of necessary information with dismantlers to facilitate the removal of critical parts. This promotes efficient recycling practices, contributes to the circular economy, and ensures that both safety and environmental goals are met in a practical manner.

### Article 12 on “Labelling of parts”:

ACEM agrees with the inclusion of labeling provisions, also to meet the objectives of the Critical Raw Materials Act. However, harmonization within the regulatory framework is essential to avoid overlapping requirements that could lead to confusion. To this end, we call for further assessment to ensure that SMEs, in particular, are not disproportionately affected by redundant or conflicting obligations.

### Article 30 and 31 on “Mandatory removal of parts”.

Unlike cars, motorcycles have historically been dismantled easily, contributing to the second-hand market for components. However, the current annex for car parts is not adaptable to L-category vehicles. ACEM proposes a dedicated annex that reflects technological advancements and practical realities for motorcycles, ensuring that parts removal is economically viable, safe, and environmentally sound. ACEM proposes to add to this list items 1 (EV batteries), 3 (SLI batteries), 5 (Catalytic converters), 8 (Wheels), 9 (Tyres) of the proposed Annex VII, Part C for cars.

Additionally, we seek clarity on how treatment centers will implement these requirements, as there may be economic implications for manufacturers. Ensuring these provisions are practical and economically viable is crucial for maintaining industry competitiveness.

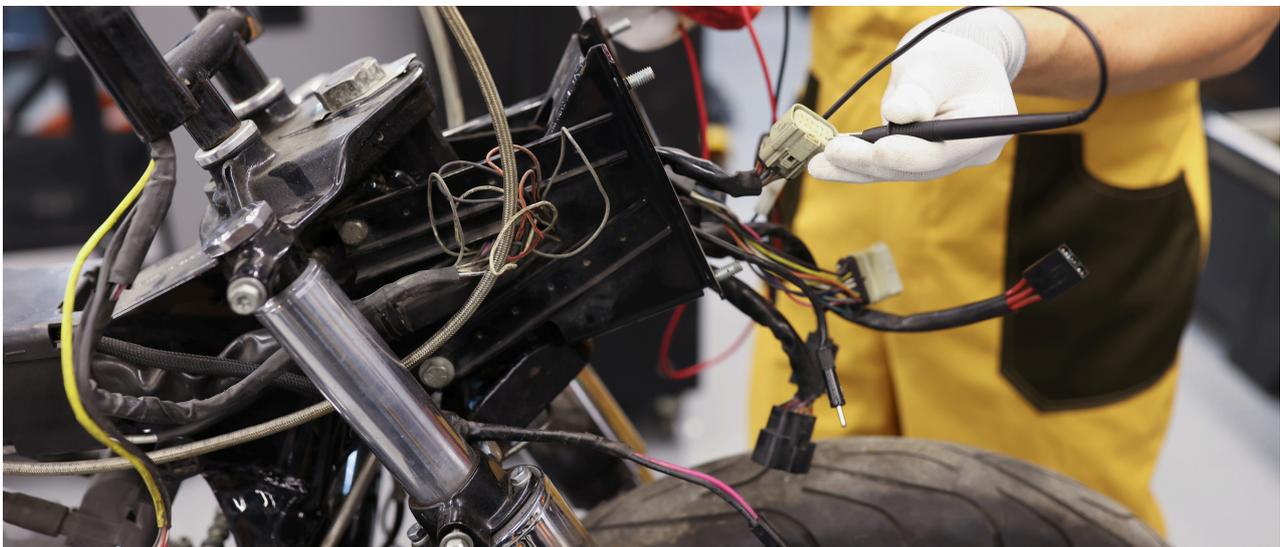


While we fully support the regulation's objectives towards sustainability and circularity, **we urge co-legislators to consider:**

**Maintaining the 60-months lead time proposed by the European Commission to ensure smooth and sustainable implementation;**

**Excluding small series motorcycles to ensure legislative fairness and industry competitiveness;**

**Ensuring that the legal framework surrounding the Producer Responsibility Organizations (PROs) is clear and fair.**



### **Maintaining the 60-months lead time proposed by the EC**

**ACEM strongly endorses the European Commission's proposal for a 60-month lead time, i.e. all requirements should only apply to vehicles that have been type-approved after entry into force + 60-month, a critical timeframe that ensures manufacturers can successfully adapt to the new regulatory landscape. This period is an essential window for the motorcycle industry to undertake comprehensive restructuring, implement new production processes, and integrate the necessary software systems to meet the ambitious sustainability goals of the regulation.**

In practical terms, our members will need to establish entirely new organizational structures, adjust manufacturing protocols, and significantly increase their compliance-related documentation – particularly for type approval procedures. Without this adequate lead time, the risk of disruption is high, placing unnecessary strain on both manufacturers and the broader supply chain.

Given the significant scope of changes supported under Articles 8, 11, 12, 30, and 31, ACEM's continued support for these extensions remains firmly contingent upon the full 60-month implementation period. This timeframe aligns the industry's readiness with the Commission's regulatory ambitions, fostering a balanced approach that ensures both compliance and competitiveness.

Additionally, we urge legislators to revisit Article 2.6 to ensure absolute legal clarity. As currently drafted, there is a risk of misinterpretation—specifically, that Article 16 might prematurely apply to motorcycles after just 36 months from the regulation's entry into force. The Commission has clarified that the obligations will only take effect after 60 months, yet without clearer language, the potential for confusion persists. Such uncertainty could undermine the industry's ability to prepare effectively and meet the regulation's objectives on time.

## Excluding small series motorcycles to ensure legislative fairness and industry competitiveness

**Advocating for the exemption of small series motorcycles from the ELV Regulation is crucial for maintaining legislative parity and competitive equity within the automotive industry.**

This exclusion aligns with the treatment of similar vehicles in other categories, ensuring a level playing field. A clear and comprehensive definition, including a reference to Article 42 of Regulation (EU) 168/2013, will facilitate a fair and consistent application of this exemption. Moreover, this would ensure a harmonious and healthy development of our SMEs ecosystem.



## Ensuring that the legal framework surrounding the Producer Responsibility Organizations (PROs) is clear and fair

**ACEM advocates for clear and fair obligations regarding Producer Responsibility Organizations (PROs).**

ACEM urges co-legislators to consider adding wording to clarify that manufacturers are only responsible for the vehicles they have put on the market. This ensures a fair and balanced approach towards bearing costs for dismantling.

Additionally, we support the introduction of financial guarantees for individual systems, ensuring that costs are covered fairly and transparently as in the case of the French ELV (Décret 2022-1495). These guarantees should be enough to cover costs for at least a year from the authorization date.



## 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 17 manufacturing companies: BMW Motorrad, Bombardier Recreational Products (BRP), Ducati Motor holding, Harley-Davidson, Honda, Kawasaki, KTM, KYMCO, MV Agusta, Peugeot Scooters, Piaggio, Polaris Industries, Royal Enfield, Suzuki, Triumph Motorcycles, Yamaha, and Zero Motorcycles.

ACEM also represents 19 motorcycle industry associations in 17 different European countries. About 400,000 jobs depend on the L-category industry in Europe. There are about 35.3 million motorcycles and scooters on Europe's roads. To find out more about ACEM please visit [www.acem.eu](http://www.acem.eu).

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