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AB Volvos svar på Remittering av EU-kommissionens förslag på förordning om cirkularitetskrav för fordonsdesign och om hantering av uttjänta fordon

The Volvo Group is transitioning to fossil-free transport, and we believe that in all our actions we must consider how to reduce climate impact, use the world's resources more efficiently, and conduct business more responsibly. It is therefore in the interest of Volvo Group to contribute to establishing criteria that determines the circularity performance of our products.

Volvo Group believes that the ELV regulation shall remain, the central piece of legislation dealing with circularity requirements for design including automotive specific provisions regarding substances, critical raw materials, production and end-of-life treatment of vehicles and their components.

Volvo Group appreciates that the Commission in their proposal has recognized that heavy-duty vehicles in their lifecycle has major differences from light-duty vehicles and is proposing a step wise introduction of heavy-duty requirements and is, as well, proposing appropriate transition times for new heavy-duty requirements (i.e. 60 months after EIF). Volvo Group is of the opinion that any new requirements introduced should be carefully assessed to ensure that circularity goals are effectively achieved whilst at the same time not overburden the industry with disproportionate requirements.

Volvo Group actively contributes to an ACEA position with detailed amendment proposals, as well working with our national trade association Mobility Sweden. However, this is still under development, and we will share when finalized before end of 2023.

We wish to support the continuous development of the ELV regulation and would welcome a dialogue with you. Our experts are at your disposal for any questions you may have.

Kind regards,

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