



**Confederation of the European
Bicycle Industry**

Colibri-Coliped

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CONEBI Position Paper on Revision of End of Life Vehicles Directive

CONEBI, the Confederation of the European Bicycle Industry, representing the EU Bicycle, Pedal Assist E-Bike, Parts and Accessories Industries, would like to express its views on the revision of the EU rules regarding end-of-life vehicles and in particular the scope of such rules.

Before going into detailed comments about the end-of-life requirements an overview of existing e-bike categories, is required. In the EU there are currently three categories of e-bikes, namely EPACs (electrically power assisted cycles outside of type approval), powered cycles of vehicle sub-category L1e-A and cycles designed to pedal in vehicle sub-category L1e-B.

EPACs make up 99% of the overall e-bike market in the EU with more than 4.5 million units sold in 2020. EPACs are equipped with an auxiliary electric motor having a maximum continuous rated power of less than or equal to 250 W where the output of the motor is cut off when the cyclist stops pedalling and is otherwise progressively reduced and finally cut off before the vehicle speed reaches 25 km/h. EPACs are excluded from EU Reg. 168/2013 (see Art.2.2(h)) and currently fall within the scope of the Machinery Directive 2006/42/EC. Most manufacturers apply the harmonized standard EN 15194:2017 which ensures compliance with the Directive. EPACs are viewed by the European and national legislators as conventional bicycles.

Powered Cycles fall within the scope of EU Reg. 168/2013 and belong to vehicle sub-category L1e-A. For powered cycles a throttle is allowed as a secondary aim with the maximum assisted speed being 25 km/h and the maximum continuous rated power 1kW.

Cycles designed to pedal (also called Speed-EPACs) fall in the scope of EU Reg. 168/2013 within the sub-category L1e-B together with mopeds. When referring to cycles designed to pedal we refer to vehicles that have a pedal assisted speed up to 45 km/h. Vehicles in L1e-B can have a maximum continuous rated power of 4 kW.

When it comes to end-of-life requirements EPACs and their system components currently fall within the scope of the WEEE-Directive¹ whereas most type approved two and three wheelers in the scope of EU Reg. 168/2013 are excluded from the scope of the WEEE-Directive and at the same time are not covered by the current ELV-Directive² (see Art. 2.1).

The Bicycle Industry has made efforts in the last 4 years to be compliant with the WEEE and believes that this is a suitable system for e-bikes as it implies take back at the municipal waste centres and

¹ Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE)

² Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles

leads to mandatory take back in some Member States' legislation and therefore eases disposal for consumers.

Based on these positive experiences and to avoid placing over-proportional burdens on an industry dominated by SMEs we believe that type approved pedal assisted e-bikes, including Speed-EPACs, should also be included in the scope of the WEEE and not in the revised ELV Directive in case its scope will be extended to all L category vehicles. We would like to point out that even though the legislative frameworks for EPACs and Speed-EPACs differ due to their divergent technical parameters (e.g. higher assisted speed and motor output for Speed-EPACs) they should be treated the same when it comes to end-of-life requirements as the electric equipment to be recycled (e.g. cables, display) is very similar and sometimes even the same. Including all types of pedal assisted e-bikes within one legislation would also facilitate the work of waste operators for whom it might be difficult to distinguish an EPAC and a Speed-EPAC at the end of its life.

CONEBI would be happy to further support the discussions on this dossier.

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