



Considering adhesives an impediment to the circularity of end-of-life vehicles misses the role they play in the sustainability, performance, and safety of vehicles.

The FEICA paper is available via the [FEICA website](#).

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In July 2023, the European Commission published a proposal for a regulation on circularity requirements for vehicle design and end-of-life vehicles (ELV regulation proposal).

The proposal describes various measures to increase the circularity of vehicles, including through vehicle design and an extended producer responsibility (EPR) system. In both the requirements on vehicle design (circularity strategy) as well in the requirements on EPR (fee modulation), adhesives are mentioned explicitly as detrimental to end-of-life vehicle circularity and therefore to be considered as potential impediments in the vehicle design process and in the EPR fee setting.

The explicit and generalized mention of adhesives as an impediment to the dismantling and recycling in the ELV regulation proposal is inaccurate, as adhesives can allow for, and even enable, successful dismantling and recycling. In addition, the current wording constitutes an uneven playing field as other materials and bonding technologies, which may prevent dismantling and/or recycling, are not mentioned.

FEICA has published a paper, which was submitted to the European Commission, as input to the development of this regulation, outlining how the explicit and generalized mention of adhesives as an impediment to the circularity of end-of-life vehicles is inaccurate and that it misses the crucial role that adhesives play in the overall sustainability, the performance, and the safety of vehicles and the desired large-scale transition to electric mobility.

Adhesives and sealants are key to combining dissimilar materials, enabling, for example, light-weight designs such as mixed-metal vehicle bodies and carbon-fiber-reinforced structural components. They also provide crucial bonding solutions for the battery system and serve the principal function of bonding together parts or components in an optimal way, with a view to performance, durability, longevity, and crash safety.

