

European Caravan Federation (ECF)

Proposed amendment to 2023/0284 (COD) Regulation of the European Parliament and the Council on circularity requirements for vehicle design and on management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2010/020 and repealing Directives 2000/53 and 2005/64/EC.

Proposed amendment.

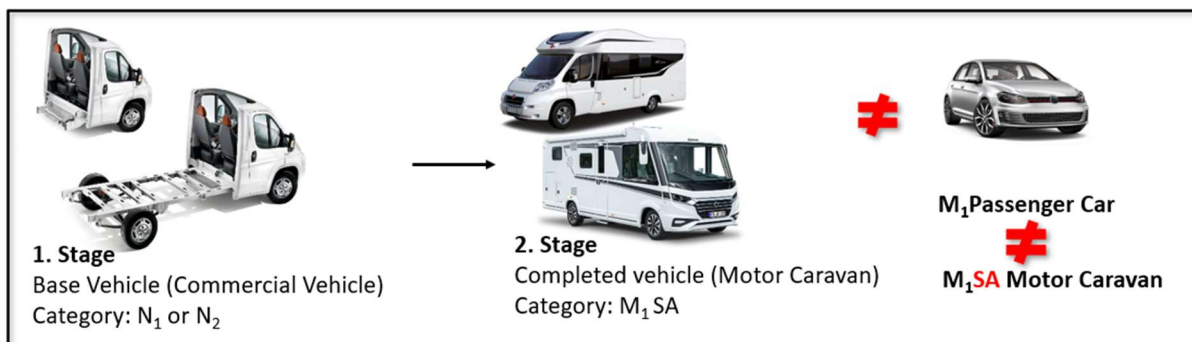
Chapter 1 (General Provisions) Article 2 (Scope)

Add new item (e) to 2 This regulation does not apply to:

(e) motor caravans as defined in Regulation (EU) 2018/858 Annex I Part A 5.1 and trailer caravans as defined in Regulation (EU) 2018/858.

Justification.

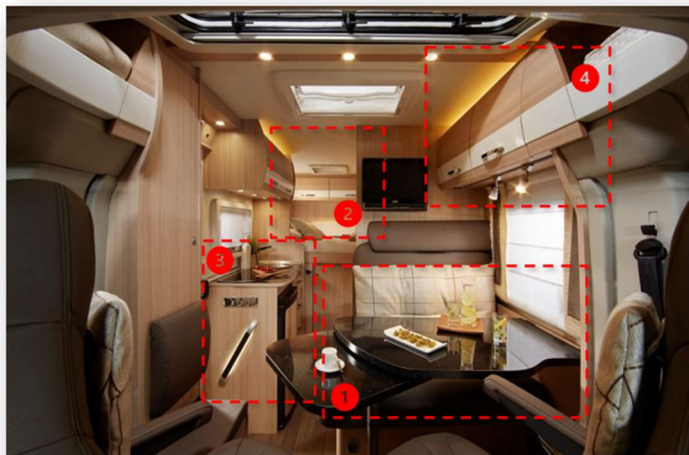
- Motor caravans and trailer caravans are considered as **special purpose vehicles**. They are not primarily a vehicle or a trailer but are used for accommodation and as such the majority of these so-called leisure accommodation vehicles (LAVs) is not constructed from automotive components. Therefore, these non-automotive components cannot be easily dismantled and recycled by vehicles dismantlers and they add major complexity to the end-of-life process.
- **Motor caravans are special purpose vehicles (M1SA), they are not passenger cars (M1):**
 - Each manufacturer in the **multi-stage** type-approval process is solely responsible for their stage of manufacturer.
 - As **motor caravans are manufactured on N1/N2-base vehicles** which can't always meet M1 vehicle requirements - **specific requirements for motor caravans are necessary**.



- **The life cycle of LAVs is completely different from usual cars (M1) or trailers (O):**
 - They wear out very little due to their function as leisure tourist accommodation: used stationary most of the time, they travel between 6500 and 7500 km per year

- They have a very low accident record, so are unlikely to "end up in the scrapyards" following a road accident.
 - They are equipped with many domestic products (beds, cupboards, kitchen, shower etc) and internal wall of construction materials (sandwich panels, wood) whose lifespan is very long, especially since they are only used at most 10-11 weeks a year.
 - The dismantling mechanism provided for in the draft regulation is not relevant for motor caravans and trailer caravans.
- **The habitation components of motorhomes and trailer caravans do not fall within the category of end-of-life vehicles:**
 - The living area is made up of elements from the building sector (wood, plastic, joinery, etc.) that the automotive sector will not be able to treat.
 - The equipment is part of the furniture sector (table, bed, etc.) or WEEE (refrigerator, etc.) that the automotive sector will not be able to deal with – with the additional difficulty of each component having its own EOL process.
 - The dismantling of these areas is outside the capability and technical expertise of current automotive dismantling facilities.
 - **By definition (see Regulation (EU) 2018/858), a motor caravan (or trailer caravan) is made of a huge living compartment with non-automotive parts:**

Motor Caravan (M₁ SA): A "special purpose" M category vehicle constructed to include living accommodation which contains at least the following equipment:



- ① Seats and table
- ② Sleeping accommodation which may be converted from the seats,
- ③ Cooking facilities and
- ④ Storage facilities.

- As motor caravans and trailer caravans are few in number and highly customised, it would not be possible to dismantle them with the same industrial efficiency as the numerous and highly standardised passenger cars and LCVs.
- The solution adopted by the proposed regulation, i.e. the distinction between multi-stage vehicles and base vehicles, is irrelevant:
 - Trailer caravans are not multi-stage vehicles but pose the same problems as motor caravans.
 - Vehicle reprocessing systems are not able to isolate the chassis from the living area, so it is impossible to provide for circularity obligations for the chassis alone.
- The EU Commission lacks significantly the data to build such a system for motor caravans and trailer caravans. It would be necessary, beforehand, to have a precise

and documented study on the reality of the potential for the reprocessing of motor caravans and trailer caravans.

Conclusion

- For all these reasons already stated above including,
- Motor caravans and trailer caravans are extremely durable goods with a long life and have been designed and maintained for decades of use.
- Their virtuous life cycle is the opposite of passenger cars or LCVs, which have a short lifespan and are focused on their function as a means of travelling.
- The materials used in the accommodation compartments for motor caravans and trailer caravans are very different from those used in a normal motor car,
- Current dismantling facilities are not suitable for leisure accommodation vehicles.
- ***The ECF as the trade body representing European manufacturers of motor caravans and touring caravans is expressly asking to exclude motor caravans and trailer caravans from the scope of the regulation.***

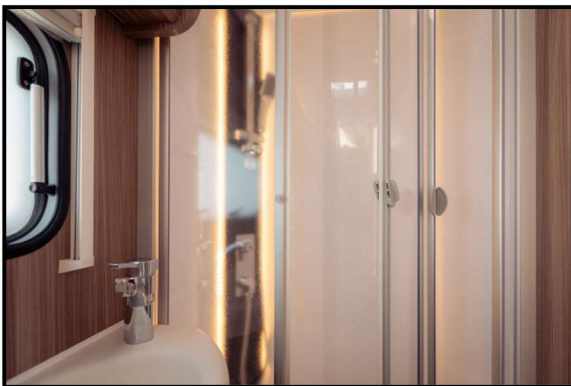
Typical layouts of caravans and motor caravans:



View from kitchen to bedroom



Kitchen



Sanitary compartment



Bedroom

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