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**Betreff:** EU-Altfahrzeuge-Verordnung

Sehr geehrte,

wir hatten uns in der Vergangenheit bereits zum Thema Batterien ausgetauscht. Nun kontaktiere ich Sie bzgl. der Altfahrzeuge-Verordnung. Man teilte mir mit, dass dieses Thema ebenfalls in Ihren Bereich fällt.

Dabei geht es konkret um den Anwendungsbereich der Verordnung. Im Juni dieses Jahres hat der Europäische Rat in seinem Standpunkt zum ELV-Vorschlag die gesamte L-Kategorie (also auch typgenehmigte E-Bikes / Speed-Pedelecs) in den Anwendungsbereich aufgenommen.

Die Komponenten von typgenehmigten E-Bikes (wie bspw. Speed-Pedelecs) sind denen von "normalen" EPACs (Pedelecs) sehr ähnlich, in der Regel sogar identisch.

Wie auch vom Europäischen Parlament in der vergangenen Woche beschlossen, spricht sich die Fahrradindustrie deshalb dafür aus, L1e-B-Fahrzeuge, die zum Treten bestimmt sind, aus dem Anwendungsbereich der Verordnung auszuschließen.

Wir schlagen stattdessen vor, diese Fahrzeuge ausdrücklich in die Richtlinie über Elektro- und Elektronik-Altgeräte (WEEE) aufzunehmen.

Nicht typgenehmigte E-Bikes (EPACs / Pedelecs) fallen bereits unter WEEE. Aus Gründen der regulatorischen Kohärenz sollten auch typgenehmigte E-Bikes unter die WEEE-Richtlinie und nicht unter die ELV-Verordnung fallen.

Anbei finden Sie mit der Bitte um Berücksichtigung für die anstehenden Trilogverhandlungen die Position unserer europäischen Partnerverbände Conebi und CIE, die wir als Vertretung der deutschen Fahrradindustrie uneingeschränkt unterstützen.

Ich würde mich freuen, wenn unsere Argumentation in den Vorbereitungen für die Trilogverhandlungen Berücksichtigung findet und stehe gern für Rückfragen zur Verfügung.

Mit freundlichen Grüßen

**Anke Schöffner**

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## **CONEBI-CIE View on the Proposal for End-of-Life Vehicles Regulation**

### **Legal Basis:**

**[COM/2023/451 final](#)** – Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on circularity requirements for vehicle design and on management of end-of-life vehicles, amending Regulations (EU) 2018/858 and 2019/1020 and repealing Directives 2000/53/EC and 2005/64/EC

CONEBI is the European association of the bicycle, e-bike, parts & accessories industries. Its members are the national sectoral organizations, working for the promotion of both cycling and the cycling industry's growth on a national level.

CIE is the voice of the cycling business, actively promoting the sector in Europe and worldwide. CIE represents leading companies and technology providers within the cycling industry that are powering a world-leading mobility transition in Europe, from manufacturing components and full bikes, e-bikes and cargo bikes.

In this paper, CONEBI-CIE is pleased to present its views on the revision of the EU rules regarding end-of-life vehicles, and particularly the scope of such rules.

### **Summary:**

The e-bike industry fully supports the ENVI and IMCO Committees' decision to exclude L1e-B vehicles designed to pedal from the scope of the End-of-Life Vehicles (ELV) draft Regulation and, in addition, proposes that these vehicles be explicitly included under the Waste Electrical and Electronic Equipment (WEEE) Directive.

Non-type-approved e-bikes (EPACs) are already regulated under the Waste Electrical and Electronic Equipment (WEEE) Directive; for regulatory coherence, type-approved e-bikes should also fall under WEEE rather than ELV.

Speed-EPACs (S-EPACs) and their components are type approved under Regulation (EU) 168/2023 but are technically comparable – and in many cases identical – to conventional EPACs. Since they are technically not different from an ELV perspective, CONEBI recommends them to be addressed under the same legislative framework (= the Waste Electrical and Electronic Equipment (WEEE) Directive).

**Rationale:**

Placing L1e-B-category vehicles under WEEE rather than ELV will:

- Reflect their real-world design and usage
- Avoid unnecessary regulatory fragmentation for our sector
- Reduce administrative burden on the bicycle industry

Including Speed-EPACs within the scope of the WEEE Directive, rather than in the revised ELV Directive, will prevent disproportionate administrative burdens on an industry dominated by SMEs, while ensuring regulatory consistency and proportionality. It will also ensure that consumers can rely on simple, well-known WEEE collection schemes at municipal centres, which are more user-friendly than establishing a separate EVL-based system.

**Introduction of the topic**

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 4.9 million units sold in 2024. 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 Regulation (EU) 2023/1230. 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** of vehicle category L1e-B (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 of vehicle category L1e-B, we refer to vehicles that have a pedal assisted speed up to 45 km/h and a mass in running order  $\leq 35$  kg, as defined in item 1.1.2 in annex XIX of COMMISSION DELEGATED REGULATION (EU) No 3/2014.

When it comes to end-of-life requirements EPACs and their system components currently fall within the scope of the WEEE-Directive,<sup>1</sup> whereas 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-Directive<sup>2</sup> (see Art. 2.1).

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

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

Over the past eight years the Bicycle Industry has made efforts to be compliant with the WEEE and considers this system suitable also for type approved e-bikes, like the speed-EPAC. This scheme implies the take back at the municipal waste centres, which in some Member States is mandated by law, thereby making the disposal easier for consumers.

### **CONEBI-CIEs position**

CONEBI-CIE fully supports the [report](#) adopted by the ENVI and IMCO Committees on 3 July 2025, in line with our view to:

- I. **Exclude vehicles designed to pedal of L1e-B category from the upcoming ELV Regulation**, proposed by ENVI-IMCO Committee [in Final Compromise Amendments](#) as follows:

*“Article 2 Scope, (2)(h): This Regulation shall not apply to cycles designed to pedal of vehicle category L1e-B as referred to in Item 1.1.2 of Annex XIX to Delegated Regulation (EU) No 3/2014.”*

Moreover, CONEBI-CIE proposes to:

- II. **Include vehicles designed to pedal of L1e-B category within the WEEE-Directive**, to be amended as follows:

*“Article 2(4) (d) of the WEEE Directive ([2012/19/EU](#))*

- a. 4. *In addition to the equipment specified in paragraph 3, from 15 August 2018, this Directive shall not apply to the following EEE:*

*[...] (d) means of transport for persons or goods, excluding **type-approved vehicles designed to pedal of L1e-B category within Regulation (EU) 168/2013 and all other electric two-wheel vehicles which are not type-approved**; [...]*”

### **Justification**

Based on 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. 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. At the same time, aligning all pedal-assisted EPACs under the WEEE, in line with the European Green Deal and the Circular Economy Action Plan, will ensure consistency with EU sustainability objectives.