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**Interinstitutional File:**  
**2023/0284 (COD)**

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**NOTE**

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From:	General Secretariat of the Council
To:	Council
Subject:	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 <ul style="list-style-type: none"><li>- General approach</li><li>= Statement</li></ul>

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**STATEMENT BY FINLAND**

Finland endorses the general approach and supports the objectives of the regulation to promote circular economy in the automotive industry and to ensure environmentally sustainable treatment of end-of-life vehicles. While the general approach provides a good basis for further negotiations between the co-legislators, we underline the importance of the following matters in the upcoming negotiations.

Firstly, we regret that the text doesn't allow the Member States to regulate that authorised treatment facilities can collect and treat end-of-life vehicles only if they have concluded a contract with a producer or a producer responsibility organisation. This is essential to us since our current well-functioning extended producer responsibility scheme is based on this requirement and enables the traceability of end-of-life vehicles and their parts from delivery to shredding.

Secondly, we are pleased that the cost allocation mechanism for vehicles becoming end-of-life vehicles in another Member State has developed to the right direction during the negotiations.

However, we are still concerned about the implementation of the mechanism and the unnecessary burden it would cause to producers and authorities.

Finally, we stress the need to clarify the provisions related to penalties to ensure effective enforcement of the regulation.

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