

**Question for written answer E-004231/2026
to the Commission**
Rule 144
Jan-Christoph Oetjen (Renew)

Subject: Coherence of recycled steel requirements under the ELV Regulation and the Ecodesign Regulation

In accordance with Article 6(7) of Regulation (EU) 2026/1738 (the End-of-Life Vehicles (ELV) Regulation), the Commission must, by 30 September 2028, adopt a delegated act to establish a minimum share of post-consumer recycled content for steel incorporated into vehicles. At the same time, on the basis of Regulation (EU) 2024/1781 (the Ecodesign Regulation), it is preparing a delegated act with ecodesign requirements for intermediate steel products, which will also include recycled content requirements. Steel producers could thus be subject to two separately defined recycling regimes – directly under the Ecodesign Regulation and indirectly through their customers in the automotive industry under the End-of-Life Vehicles Regulation.

1. To what extent will the Commission use the same definitions of post-consumer and pre-consumer waste when establishing the methodology for calculating recycled steel content under the ELV Regulation as in the Ecodesign Regulation for steel, and in which respects does it consider differences to be necessary?
2. What specific measures does the Commission plan to take to ensure that steel used in vehicles is not subject to both regimes, for example by clarifying that steel intended for use in vehicles is covered by the exemption under Article 1(2)(h) of the Ecodesign Regulation?
3. With regard to its feasibility assessment under Article 6(7) of the ELV Regulation, how does the Commission intend to take into account the fact that recycled content requirements under the Ecodesign Regulation may increase demand for post-consumer scrap in other sectors and thus reduce its availability for steel products used in vehicles?

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