

Assessment of the implementation of Directive 2000/53/EU on end-of-life vehicles (the ELV Directive) with emphasis on the end-of-life vehicles of unknown whereabouts

Documentation of the public consultation: Shortened versions of suggestions outlined in questionnaire

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Full and shortened versions of the suggestions outlined in the ELV Directive public consultation questionnaire

The following table shows the full and shortened versions of the suggestions outlined in the public consultation questionnaire. The shortened versions of the suggestions can be seen in the graphs presented during stakeholder workshop.

Full version	Shortened version
Topics and suggestions	
1. Keeping track of vehicles within the EU (intra-EU trade)	
A) MS should report on their export/ import of used vehicles based on the data exchange of the competent authorities, as stipulated in Article 5(2) of Council Directive 1999/37/EC.	A) Report MS export/ import of used vehicles based on the data shared between competent authorities
B) Because a de-registered vehicle at its end-of life is hazardous waste (European List of Waste Code 16 01 04*) and needs to be treated accordingly, it is necessary to trace the owner responsible for such waste. It should be obligatory to register change in ownership, even if the vehicle is no longer registered for public roads. This is the case until the vehicle is either exported as a used vehicle or until a CoD is issued.	B) Trace owner of de-registered vehicle until vehicle is export as used vehicle or until issuing a CoD
C) In order to de-register a vehicle, the owner is obliged to submit documents that demonstrate its sale or legal dismantling (an issued CoD).	C) Condition for vehicle de-registration: documents demonstrating sale or legal dismantling (issued CoD)
D) When a vehicle is de-registered, exported and then dismantled in the receiving Member State but not re-registered, the dismantling must be done in an ATF. The ATF is obliged to issue a CoD and send it to the responsible authority/ national vehicle register, which would be obliged to forward the CoD to the Member State where it was last registered.	D) Deliver a CoD issued in the receiving MS to the MS of vehicle's last registration
E) Temporary de-registration must be accompanied by information on the fate of the vehicle (e.g. by the vehicle owner's declaration of intent to sell, export or store the vehicle, or that there is no intention to dispose of the vehicle).	E) Include information of a vehicle's fate with temporary de-registration documents

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<p>F) The owner of a vehicle that is temporarily de-registered or flagged as, for example, “insurance missing” or “tax not paid”, should be obliged to issue an annual statement about the status of the vehicle. In cases where such statements have not been issued, a fine could be imposed on the owner/ holder.</p>	<p>F) Require vehicle owners/ holders to issue annual statement about status of temporarily de-registered or flagged vehicles. Fines to owners/ holders may be imposed when no statement is submitted</p>
<p>G) Member States should be encouraged to establish fees or refund systems to support the treatment of ELVs in ATFs. For instance, the UK and Cyprus keep annual road vehicle taxation unless a CoD has been delivered.</p>	<p>G) Encourage MS to establish fees and refund systems to support ELVs treatment in ATFs</p>
2. Methods to achieve more complete reporting on extra-EU export and ways to distinguish between exporting ELVs vs. used vehicles	
<p>A) MS should make the Correspondents’ Guidelines No 9 legally binding and establish national definitions (as done in Austria)*. *Switzerland ha+A23s established a different approach to distinguish used vehicles from ELV</p>	<p>A) Make ‘Correspondents’ Guidelines No 9’ a legally binding document at the MS level</p>
<p>B) The content of the Correspondents’ Guidelines No 9 should become legally binding at a European level, as done for Correspondents’ Guidelines No 1 in the Directive 2012/19/EU on WEEE**. ** Directive 2012/19/EU of the Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE), OJ L 197, 24.7.2017, p. 38-71</p>	<p>B) Make ‘Correspondents’ Guidelines No 9’ a legally binding document at European level</p>
<p>C) Vehicles over 10 years old should be barred from extra-EU export, since the remaining life-span compared to the environmental risk is no longer appropriate.</p>	<p>C) Bar vehicles aged +10 years from extra-EU export</p>
<p>D) Vehicles over 14 years old (average age of ELVs in Europe) should be barred from extra-EU export, since the remaining life-span compared to the environmental risk is no longer appropriate.</p>	<p>D) Bar vehicles aged +14 years from extra-EU export</p>
<p>E) National authorities should increase the number of inspections of vehicles to be exported, within the framework of Article 50(2a) of the Waste Shipment Regulation***, which requires MS to establish inspections plans by 1 January 2017. *** Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste, OJ L 190 12.7.2006, p. 1</p>	<p>E) Increase inspection amount of vehicles for export</p>

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<p>F) Further suggestion F and G are related to tracking the exports that is not reported, e.g. illegal export. European Networks such as IMPEL (European Union Network for the Implementation and Enforcement of Environmental Law) should strengthen their cooperation and exchange of good practices in the field of illegal export or treatment of ELVs.</p>	<p>F) Enhance cooperation and exchange of good practices between European Networks and IMPEL to address illegal ELV export or treatment</p>
<p>G) Cooperation of national police forces, Europol and Interpol, should be reinforced and intensified in their efforts to track down illegal ELV exports and treatment.</p>	<p>G) Enhance cooperation between national police, Europol, and Interpol in tracking down illegal ELV exports and treatment</p>
<p>H) Within the Waste Shipment Directive, reporting on the European List of Waste (LoW) code should be compulsory when completing waste shipment documents for export. (A specific cell is already reserved for such information in the existing template; however, reporting the European LoW code is only voluntary.)</p>	<p>H) Report the European List of Waste code when completing waste shipment documents for export (within the Waste Shipment Directive)</p>
3. Enforcement techniques to reduce illegal dismantling of ELVs at dealers and repair shops (garages) and actions to improve ATF compliance	
<p>A) National authorities should regularly perform on-site inspections to identify illegally operating dismantling facilities. One possible way to identify illegal dismantlers is to examine the list of the dismantlers/ operators in phone books, advertisements or websites, such as eBay, and compare it with the list of registered ATFs.</p>	<p>A) National authorities perform regular on-site inspections to identify illegally operating dismantling facilities (i.e. examine phonebook listing of treatment facilities, etc.)</p>
<p>B) The EC should establish minimum requirements for ATF inspections.</p>	<p>B) EC establishes minimum requirements for ATF inspections</p>
<p>C) Spare parts should be accompanied by a VIN number and/ or a CoD, as well as an ATF's registration, to ensure that the spare parts were recovered by an ATF.</p>	<p>C) Spare parts include the destined vehicle's VIN number and/ or CoD and ATF registration number</p>
<p>D) For every used vehicle that is imported to a Member State, a recycling fee should be paid. For every new vehicle placed on the national market, a recycling fee should be paid as well. This fee would be returned when a CoD is issued for the respective vehicle.</p>	<p>D) Establish recycling fee for imported used and new vehicles; fee reimbursed as soon as CoD issued</p>

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E) A refundable recycling fee should be paid by the owner when registering a new or used vehicle. This fee should be reimbursed either when a CoD is issued or when the respective vehicle is sold and an adequate notification is made in the national registration system.	E) Owner pays refundable recycling fee when registering new or used vehicle; fee reimbursed either when CoD is issued or when vehicle sold and national vehicle register notified
F) ATFs should notify, preferably electronically, the national vehicle register when a CoD is issued. For ELVs not registered in the country, suggestion D shall apply.	F) ATFs notify (preferably electronically) the national vehicle register when CoD issued
G) ATFs should identify the vehicle and check that the vehicle holder is authorised to scrap the vehicle.	G) ATFs check vehicle owner's authorisation to discard the vehicle.
H) ATFs should inform the authorities when they receive dismantled ELVs from unauthorised dismantlers.	H) ATFs inform authorities when received dismantled ELVs are from unauthorised dismantlers
I) Shredders should report the number of treated ELVs and CoDs received.	I) Shredders report the number of treated ELVs and CoDs received
J) National authorities should regularly perform on-site inspections of ATFs and shredders. This should be done according to the elaborated Action Plan.	J) National authorities regularly inspect ATFs and shredders on-site according to the elaborated Action Plan
K) The results of inspections of ATFs and shredders should be reported to the Commission.	K) Inspectors report results of ATF/ shredder inspections to EC
L) The EC should establish minimum requirements for inspections of ATFs and shredders.	L) EC establishes minimum inspection requirements of ATFs and shredders

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4. Public awareness and incentives for ELV tracking and environmental risks	
<p>A) A financial incentive should be implemented for a vehicle's last owner to properly deliver the vehicle for disposal. For example, the last owners are paid a premium when delivering an ELV to legal dismantlers. The premium is financed by a deposit paid to a (public) fund at the time of first registration in the national register.</p>	<p>A) Establish financial incentives for vehicle's last owner to properly dispose ELV, e.g. premium from the (public) fund for delivering ELV to legal dismantlers, financed by deposit paid at first registration in national register</p>
<p>B) An education initiative should be implemented to inform vehicle owners of a vehicle's environmental risks. For example, a message can be enclosed with every vehicle tax reminder on how to scrap the vehicle accompanied by press releases in national newspapers to explain the CoD process and the importance of proper ELV treatment (environmental matters).</p>	<p>B) Establish education initiative to inform vehicle owners of vehicle's environmental risks, e.g. leaflet on how to scrap vehicles and CoD process enclosed with every vehicle tax reminder or in press releases</p>
<p>C) If the owners do not fulfil their duties (i.e. delivering the vehicle to an ATF using the correct procedure and properly de-registering the vehicle by providing a CoD or other document confirming legal sale), they should continue to be responsible for paying the vehicle tax or other payment (penalty) until those duties are fulfilled.</p>	<p>C) Owners do not fulfilling their duties continue responsibility for paying vehicle tax or other payments (penalties) until duties fulfilled</p>
<p>D) To increase public confidence, ATFs could be branded as a chain or certified. This could also raise public awareness of ELV environmental issues and promote ATFs.</p>	<p>D) Brand ATFs as chains or certified locations to raise public awareness of ELV environmental issues and promote ATFs.</p>
5. Aspects to improve coverage and data quality when reporting on ELVs (possible revision of the Commission Decision on ELV annual reporting)	
<p>A) Article 1(1) of Commission Decision on ELV annual reporting asks for an appropriate description of the data used. To ensure better quality and comparable quality reports, the Commission should identify the details addressed by such reports.</p>	<p>A) EC identifies details addressed by quality reports</p>
<p>B) The "current national vehicle market", for which in Article 1(3) of Commission Decision asks for a breakdown, should be further described. In particular, more precise data on new registrations, on the change in Eurostat's 'vehicle parc' and the export/ import of used vehicles, and on the number of ELVs and CoDs would enable a better evaluation of the coverage by country.</p>	<p>B) Offer more precise data on new registrations, on changes in Eurostat's 'vehicle parc' and export/ import of used vehicles, and number of ELVs and CoDs</p>

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C) MSs' Quality Reports and data on their current national vehicle markets should be published in order to establish "best practice" and improve overall reporting quality.	C) Publish MSs quality reports to establish 'best practice' and improve overall reporting quality
D) "Non-ferrous materials" should be changed to "non-ferrous metals" in table 2 of the reporting tables in the Annex of the Commission Decision.	D) 'Non-ferrous metals' in reporting table 2 (Annex) instead of 'non-ferrous materials'
E) It should be clarified if MS are obliged to distinguish between ferrous scrap and non-ferrous metals when the Metal Content Assumption is applied.	E) MS distinguish between ferrous scrap and non-ferrous metals when using Metal Content Assumption
F) In tables 1 and 2 of the reporting tables in the Annex of the Commission Decision, an additional column should be added indicating how many ELVs were exported.	F) Number of exported ELVs in reporting tables 1 and 2 (Annex)
G) For data comparability, when the Metal Content Assumption is applied, a breakdown of the metals should be added to tables 1 and 2 of the reporting tables in the Annex of the Commission Decision.	G) Metals breakdown in reporting tables 1 and 2 (Annex) when applying Metal Content Assumption
H) A harmonised approach to calculate reuse should be introduced, which could perhaps address the subtraction method and/ or metal content assumptions.	H) Harmonised approach to calculate reuse that perhaps addresses subtraction method and/ or metal content assumptions
I) In table 1 of the reporting tables in the Annex of the Commission Decision, Member States should report the number of CoDs issued by ATFs.	I) Number of issued CoDs in reporting table 1 (Annex)
J) In table 2 of the reporting tables in the Annex of the Commission Decision, Member States should report the number of hulks (i.e. depolluted and dismantled vehicles) treated by shredder plants and the number of CoDs received by shredder plants. This would enable better validation of material flows.	J) Number of hulks treated by shredder plants and number of CoDs received by shredder plants in reporting table 2 (Annex)

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<p>K) In the course of a revision of the Commission Decision on ELV annual reporting, the reporting tables should be adjusted in order to make reporting on recovery other than energy recovery, e.g. backfilling, possible.</p>	<p>K) Reporting tables to include information on recovery other than energy recovery, e.g. backfilling</p>
6. Persistent Organic Pollutants (POPs) and ELVs	
<p>A) To support pre-treatment and dismantling for ELVs, the worldwide IDIS (International Dismantling Information System), developed by vehicle producers, should include information on potential pollutants to the recycling process, such as persistent organic pollutants (POP) or other substances not yet mentioned in the ELV Directive.</p>	<p>A) To support ELV pre-treatment and dismantling, IDIS (International Dismantling Information System) includes information on potential pollutants to ELV recycling process, such as persistent organic pollutants (POP) or other substances not yet mentioned in ELV Directive</p>