

# 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: Part 2. Additional suggestions from the responders

Darmstadt, 15 November 2016

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## Introduction

This document displays the additional suggestions of stakeholders how to address the challenges described in the questionnaire for the public consultation “on potential measures to improve the implementation of certain aspects of the Directive on end-of life vehicles, with emphasis on ELVs of unknown whereabouts”.

The public stakeholder consultation ran for twelve weeks from **29 June 2016** to **21 September 2016**.

This document includes all stakeholders except those which asked to keep their contribution to the questionnaire confidential. The contributors asking for anonymous publication are included accordingly. For additional information e.g. what suggestion is proposed by whom and what other suggestions (and ratings for the numerical responds) are submitted by the same responder, please refer to the full data set (excluding again the confidential contributions and the contact details of those who asked to contribute anonymously) available [here](#).

This document is called “Part 2. Additional suggestions from the responders” and it is accompanied by other document:

Part 1. The numerical statements, displaying the rating of the responders for suggestions outlined in questionnaire

The questionnaire used for the public consultation is available [here](#). More information about the public consultation and study are available on the project’s website: [elv.whereabouts.oeko.info](http://elv.whereabouts.oeko.info).

## 1. Keeping track of vehicles within the EU (intra-EU trade)

### 1.1. Authorities

To every sales agreement of a damaged vehicle there should be a report on technical condition attached. The report should include: 1) a list of damaged parts requiring to be repaired; 2) a list of damaged parts requiring to be exchanged; 3) percent level of destruction of particular parts of the vehicle such as: painted vehicle body, body equipment, motor engine with all accessories, driving system, front suspension with steering gear, rear suspension. The report allows to define whether the vehicle requires a minor repair in accordance with the Correspondents' Guidelines No 9.	1
There should be a EU regulation on vehicle registration. Not only on re-registration and de-registration, but on registration in general, including the end-of life phase. One of the aims should be to guarantee a continuous chain of holdship, containing the natural or legal persons that are responsible or liable at a certain moment for the vehicle.	2
In ELV directive there must be a possibility for deregistration of the end-of life vehicle from the register without CoD. Such possibility is needed for certain cases where the vehicle does not exist any more. In those cases, it is impossible to issue a CoD and it would be inaccurate to keep the vehicle in the registry dataset. Such alternatives could be for example reasoned application from the vehicle's owner.	3
The ELV Directive should be amended after a revision of the Correspondents Guidelines No 9 has taken place in order to harmonise interpretation of terms such as repair at reasonable costs. It shall be laid down, which repair costs in comparison to the actual value of the vehicle are meant in the light of Art. 28 of the Waste Shipment Regulation (repair costs of EU- Member State of dispatch or average EU repair costs (problem : how to be calculated and regularly updated)). The main contents of these amended Corr. Guidelines No 9 should become legally binding at EU level by an amendment of the ELV Directive, similar as done in the WEEE Directive.	4
Additional note (E): Temporary de-registration should be established for a concrete and short period of time (e.g. 1 year)	5
Comments related questions:A-We consider that the competent authority for registration of vehicles should be involved in this process. If it will be established that this competent authority will be involved in this process, then ELV Directive should be modified, because it is necessary to establish clear its responsibilities, and its obligations regarding data providing.	6
There should be only three options to (finally) deregister a vehicle: a) provide CoD, or b) in case of export to other MS: re-registration by new owner in other MS, or c) in case of export outside EU: prove of export (issued by customs authority). In case of sale within the same MS, there is no de-registration, but only registered change of ownership.	7
All vehicles for export must be de-registered	8
If car written off by insurance, it should be registered in Insurance name	9
Question A:The data exchange should primarily be performed electronically by using the EUCARIS, the European car and driving licence information system. The implementation of EUCARIS in all Member States should be encouraged. Question B: The obligation to register the change of the ownership, even if the vehicle is no longer registered for public roads, is very difficult to supervise in practice, since there are no other legal obligations for the owner of the vehicle, which is no longer registered for public roads. It is impossible to know and supervise, if the owner of this kind of vehicle changes.	10

Member States should use the existing functionalities in the EUCARIS system. At re-registration EU member states should inform each other of changes in the holdership, in order to keep the chain intact. Most elements of the information exchange are already covered by the EUCARIS system.	11
Comments related question_B_In this case we have two distinct situations, so: - the vehicle is de-registered, so it cannot run on public roads and the de-registration was done on the basis of a Certificate of Destruction issued by an Authorized Treatment Facility to the last owner; In this case we have an ELV, hazardous waste, and the Authorized Treatment Facility is responsible for its management. The last owner has fulfilled his responsibilities, because he gave the hazardous waste to an Authorized Treatment Facility (authorized by police, by a technical authority for vehicles, "Registrul Auto Roman" and by environmental authorities).; - the vehicle is de-registered, for other reasons stipulated by the law, in this case it is not a waste, but a commodity, so it can be exported as a used vehicle;The problem in this case is the purpose of export, such as: it can be re-registered in the importing State or it can be sent to dismantling. The goal now is to identify the exported used vehicles, which are not re-registered, but are sent to a treatment facility for dismantling, and we consider this is the point that needs some changes in the laws in order to close this gap. This measure could be combined with the one proposed above.	12
Vehicle taxes should be connected to car ownership, not usage on public roads. Therefore, obligation to pay taxes only ends in the cases, listed in Additional proposal no. 1 (see above).	13
If an attempt is made to re-register a vehicle in another MS system should flag this	14
Insurer should not pay insurance without COD in case of write off	15
Question E: This would be impossible to implement in practise and would cause a lot of administrative burden both to car owners and the authority. For example camper vans could be temporary de-registered several times in a year. The information on the fate of the vehicle would not give any additional value. QUESTION F: This would cause a lot of administrative burden and the supervision would also be very burdensome. The situations where the new owner of the car fails his duty to register the change of the ownership would be very problematic, because in that case it would be impossible to point out who would be liable for payment. The Finnish Solicitor General has required that the car seller has to have the right to declare, that he has turned his car to "unknown", in the case where it is not possible to find out the new owner of the car.	16
Comments related question_D_In this case the vehicle was not de-registered on the basis of the Certificate of Destruction, and was exported as a commodity in another Member State, as a used vehicle. In order to assure that the ATF sends the CoD to the exporting MS, some new rules have to be implemented at EU level, similar to those valid now at national level.	17
Central vehicle register on European level	18
Should be category for vehicle exported but not re registered in new country	19
QUESTION G: The situations where the new owner of the car fails his duty to register the change of the ownership would be very problematic, because in that case it would be impossible to point out who would be liable for payment. The refund system or something similar could be more functioning in this sense.	20
<b>1.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
There should be a national register of motor traders & vehicle movements must be tracked through the motor trade - in the UK this is not the case. Many illegal operators masquerade as motor traders in order to get hold of vehicles & avoid vehicle registration issues. DVLA is part of the problem in the UK	1
Section 9 V5C - Needs a big rethink!!! Motor trade and Dismantler need own sections. Motor trade	2

must be checked against database to see if legit. Dismantler must be checked against database to check if registered. This means that both these Sections need to be done Via an online portal, and not by posting or filling in a bit of paper. Both motor trade and dismantler have access to online portal only if they are properly registered.	
Cat B break only vehicles should not be exported to other countries, and only broken by registered ATF's in the country in which it was damaged.	3
Registration needs to be continuously, no temporary deregistration, only suspension of vehicle is not used	4
1. strongly supportive of a solution enforcing that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD	5
Lacking Waste Shipment enforcement (no checks at EU borders)	6
The most significant problem linked to ELV whereabouts is related to: The lack of enforcement of existing legislation, Statistical flows. The lack of enforcement of existing legislation, throughout the EU, is particularly relevant in connection with the existing requirement according to which "the presentation of a certificate of destruction (CoD) is a condition for deregistration of ELV. It is necessary that the responsible authorities in the member states fulfil their legal orders.	7
In Spain we have an annual road tax (IVTM) which undoubtedly is a great measure to reduce the problem of "missing vehicles." We believe that it would be really interesting to establish that vehicles temporarily deregistered are not completely exempt from paying that kind of annual tax.	8
exhaustive listing of ATFs in every Member state should be available	9
The most significant problem linked to ELV whereabouts is related to: 1. the lack of enforcement of existing legislation; 2. statistical flows. The lack of enforcement of existing legislation, throughout the EU, is particularly relevant in connection with the existing requirement according to which "the presentation of a certificate of destruction (CoD) is a condition for deregistration of end-of-life vehicle (ELV). It is hence instrumental to better implement the existing legislation and to provide well-framed incentives for the last holder to deliver the vehicle to authorised treatment facilities (ATFs), in order to strengthen the CoD. Hence, instead of establishing of systems as suggested under choice G, EuRIC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported.	10
It is important that the owner has a responsibility to deliver the ELV to an ATF. Set out mandatory collection rate for the producers/importers (as by WEEE)	11
Clarify the responsibility of the importing MS for the vehicles that are imported, but never registered	12
Legislation at national level: Every year, on average, about 30% of ELVs with canceled registration (in 2015 was 31.3%) no Certificate of Destruction (CD) is associated. In Portugal, it is proved that it was not sufficient to transpose the ELVs Directive to national law in order to improve management practices of these vehicles. However, significant improvements were made, mainly because major players, including some illegal, invested in modern units of anti-pollution and dismantlement of ELVs. However, the existence of legislation related to the cancellation of registrations that leads to the dismissal of a CD without requiring major justifications made flourish new scrap dealers businesses. Some of these businesses are organized companies that take advantage of legislation loopholes, others are	13



individuals that make a way of living from illegal ELV management practices, or see it as an important economic complement. In the case of Portugal, the problem lies in the Road Traffic Code which includes several opportunities to cancel registration of vehicles without being required a CD. Some of these situations may even be legitimate to the owner of the car, but lack justification and control, so that they are not misused for illegal ELVs management practices. Thus, the most important proposal to be drawn from this point is that Member States should be required to adapt all existing legislation, including the Road Traffic Code to the "spirit" of the ELVs Directive, in order to eliminate the loopholes that have allowed much of 30% of the vehicles with canceled registration to be managed illegally as ELVs.	
lack of enforcement of existing legislation	14
The most significant problem linked to ELV whereabouts is related to: 1. the lack of enforcement of existing legislation; 2. statistical flows. The lack of enforcement of existing legislation, throughout the EU, is particularly relevant in connection with the existing requirement according to which "the presentation of a certificate of destruction [CoD] is a condition for deregistration of end-of-life vehicle [ELV]". It is hence instrumental to better implement the existing legislation and to provide well-framed incentives for the last holder to deliver the vehicle to authorised treatment facilities (ATFs), in order to strengthen the CoD. Hence, instead of establishing of systems as suggested under choice G, FEDEREC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported.	15
MS or producer/importer should establish a central database for all vehicles within the EU. As soon as a car is registered it would be known and any further change in status must be added to this already existing file (over the national registration authorities). Unique key for each vehicle is the VIN (Vehicle identification number). Last input comes from the ATFs who add the status CoD-issued.	16
The lack of enforcement of existing legislation, throughout the EU, is particularly relevant in connection with the existing requirement according to which "the presentation of a certificate of destruction [CoD] is a condition for deregistration of end-of-life vehicle [ELV]. It is hence instrumental to better implement the existing legislation and to provide well-framed incentives for the last holder to deliver the vehicle to authorised treatment facilities (ATFs), in order to strengthen the CoD. Hence, instead of establishing of systems as suggested under choice G, Stena Recycling supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported. In Norway there is a system already in place providing an incentive for the last owner to deliver the ELV to an ATF. This system in Norway is based on a fee at first registration. In Sweden it would be much more efficient to finance such a system based on an annual fee for each registered vehicle. MS should be free to choose the system that fits the conditions best in each MS and thereby securing a refund to the last owner when delivering the ELV to an ATF.	17

Comments or suggestions: • The most significant problem linked to ELV whereabouts is related to the lack of enforcement of existing regulation • Different practices between individual EU Member States cause difficulties when tracing vehicles. As there is a lack of traceability and of reliability of the registered data, big discrepancies exist between cars that are registered in national registers and cars that are really in use. • The different suggestions we have selected have to be combined • The proposal E, regarding temporary de-registration, is not a desirable situation. Only ATFs should be able to deregister vehicle, before destruction and recycling, or there would be an important risk of total loss of traceability.	18
Referring to suggestion B: Also referring to the comments provided in the introduction of this questionnaire, ZDK wants to point out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste.	19
The last owner of the car who deliver it to the dismantling station should be rewarded (100 - 200 Euro)	20
Owner of vehicle or register keeper MUST be held more accountable in Law in regards to transfer of ownership	21
The above answer minimises further complications, as communication difficulties are dealt with.	22
Suspension of registration renewed every year or pay vehicle obligations	23
The CoD has to be mandatory for final de-registration of a vehicle. A strong surveillance and enforcement of the before mentioned proposals has to be ensured. This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector	23
Existing rules are not standardized in the EU, especially EOL vs. second hand vehicle	25
Option G BVSE refuses any kind of recycling fee. There are different reasons for our position. All established systems showed no positive effect in regards to environmental issues. Implementing financial incentives is more than difficult and corresponds with additional high administrative burdens that interfere with the market forces and thus the market's players. Also it introduces a significant momentum of rigidity, that contradicts the market's as well as the player's necessity to adapt to increasingly swift changes and developments on the international resource markets. Thus the implementation of such an incentive scheme disrupts the existing market balance on a functioning and competitive market without need.	26
Regarding Suggestion 1.G: there should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). We do not support the fees/refund system and our 1 rating is only if the suggestion is to establish an annual road tax. If the suggestion is to establish another kind of fee or refund system our rating will be a 5.	27
it must be clearly stated that dismantling a second hand car by a private person is forbidden because the vehicle is deemed to be a waste as there is no intention to circulate with it ever	28
EuRIC strongly supports that “temporary de-registration must be accompanied by information on the fate of the vehicle” to prevent abuses. For example, in Sweden, there are currently 5.5 million vehicles registered out of which 1.2 million of them are temporarily de-registered. Such a high proportion of temporarily de-registered vehicles is not realistic and weakens the enforcement of CODs. Furthermore, not distinguishing between a temporary deregistration and a final deregistration causes uncertainty and leads to statistical gaps, especially when different authorities do not have the necessary data and cannot determine the ELV whereabouts.	29
For example: a mandatory collection rate 40-50% of cars placed on the market in a determined period, or higher if export is included (BE).	30

An incentive for the last owner to bring the ELV to an ATF is favourable. In the Netherlands 'ownership'tax stimulates the last owner to bring the ELV to an ATF	31
Articulation between electronic platforms: Quercus, as an environmental NGO stakeholder, have almost managed an agreement between the Portuguese Environment Agency (APA), the IMT and VALORCAR (the Portuguese management authority for ELVs), regarding the full articulation of different electronic platforms with emission targets in just one place of the CD, real-time check of licensed operators, etc. At the joint meeting promoted by Quercus with the three public bodies and the follow-up exchange of information were unanimous that the situation was technically and legally feasible to solve. But, unfortunately, soon after and upon Quercus insistence claimed to APA authorities due to lack of response, the NGO was informed that the initiative would not move forward.	32
technical/economic controle of cars before export within and out of Europe	33
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<ul style="list-style-type: none"> <li>• The technical control (roadworthiness) if properly used in link with the national vehicle registration system, could be a very useful tool. Indeed, if the owner of the vehicle doesn't respect the legislation regarding the roadworthiness, which has to be done on a regular basis, the local authorities could address an ultimatum: o the owner does the technical control, is compliant and has no fine to pay o the owner does the technical control, isn't compliant, and has to destroy his vehicle and prove (through a CoD) that his vehicle has been treated by an ATF (If the owner isn't able to prove it, then he continues to pay the insurance or the annual fee) We suggest to put the roadworthiness anniversary date (month and year) on each car number plate (as in Germany for example)</li> </ul>	36
If there is no anual technical report of a car one should be summoned to explain or deliver a Cod	37
Manufacturer held more accountable to the vehicles they produce. A built in charge on all new vehicles which covers the disposal of the vehicle at the end of life stage. Registered keeper can use online service to arrange disposal using V5 reference number, then Agent acting on behalf of manufacturer to arrange collection and processing of vehicle.	38
The only way to minimise administration issues is by breaking the vehicle in the home country and then potentially sell parts abroad to reduce language barriers.	39
COD's only issued by dismantlers, no need for export of deregistrated ELV's.	40
There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration).the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	41
Distinguishinh EOL versus second hand vehicle is impossible by enforcement officers	42
Regarding suggestion 1.B just a small clarification: a deregistered vehicle is not always a hazardous	43

waste. It is hazardous waste only when it is delivered in an ATF for its environmental treatment but not when the vehicles is deregistered for exportation or just temporarily deregistered. In any case the suggestion is very interesting.	
Suggestion G: It is important to have an incentive for the last owner to deliver the ELV to an ATF in order to avoid illegal activities. If the refund can only be paid out when the ELV is delivered to an ATF then there is a clear signal to the last owner.	44
Monitoring : It is known the lack of auditing resources in Portugal, but this situation brings serious damages to licensed operators and the own State themselves. For Quercus, the inspection for hazardous wastes must be proactive, especially through research of online sites selling vehicles and spare parts, as Quercus with fewer human and economic resources available was able to prove that it is actually quite easy to detect ilegal situations.	45
The administrative and physical treatment of ELVs by ATFs should be facilitated in case of missing registration certificates, in order to prevent those vehicles to follow an illegal system. Indeed, if regulatory requirements are too strong on the compliant recycling companies, the risk is that those vehicles will be treated by illegal companies.	46
The treatment by ATFs should be facilitated in case of missing stages in the vehicle registration document, in order to prevent those vehicles to follow an illegal system. Indeed, if regulatory requirements are too strong on the compliant recycling companies, the risk is that those vehicles follow an illegal path. • We have to forbid (fight) export of flattened cars because this situation involves a break of traceability (nature of the vehicle not recognisable) and a uncertainty regarding the quality of the treatment upstream	47
<b>1.3. CMI (Car Manufacturers/ Importers)</b>	
European track record and database is condition sine qua non	1
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	2
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	3
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	4
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD	5
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	6
Additional proposal (by VDA): Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD	7
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	8
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	9
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	10
Consequent enforcement of the already existing legal requirement, that only authorized / certified	11

dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	
Additional proposal (by ACEA): Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	12
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Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD.	14
One of the reasons for ELVs unknown whereabouts is the lack of strong enforcement and monitoring of the illegal dismantling operators. Therefore, SMMT proposes to strengthen enforcement activity to ensure that ELV's are only treated by legitimate authorised treatment facilities correctly issuing COD's in line with statutory requirements.	15
Consistent enforcement of already existing legal requirement, that only authorized/certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD	16
Consequent enforcement of existing legal requirements that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD is must be secured before additional measures are considered.	17
From 2020, all new vehicles must be equipped with an emergency call system. It would be wise to use this system for confirmation of the destruction of the vehicle with a Date and place of treatment. This would more effectively identify illegal channels.	18
Consequent enforcement of the already existing legal requirement, that only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD	19
G: no subsidy, refund or fee. If not deregisterd, insurance must be paid and or road tax must continue	20
The CoD has to be mandatory for final de-registration of a vehicle (ideally by online connection to central registration system). The ideal process would be a "2-Step-CoD". First issuing to the last holder when receiving the vehicle. Second issuing to authorities as confirmation of finalization of the treatment of the end-of-life-vehicle. A strong surveillance and enforcement of the before mentioned proposals has to be ensured. This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector. No statistical gaps – no unknown whereabouts – no missing ELVs.	21
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Throughout the life a vehicle, there should always be a record of its keeper (also when held by a dealer- ‘in trade’). A CoD should be a compulsory requirement to enable vehicle’s final de-registration, preferably in an on-line system. The ideal system would be a 2-step-CoD system, with the last keeper receiving a CoD when passing the vehicle with the intention to dispose of it. Followed by a confirmation from ATF to the competent authorities when the treatment of the vehicle was finalised.	34
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The Danish Car Importers Association agrees with the following suggestion by ACEA: "The CoD has to be mandatory for final de-registration of a vehicle (ideally by online connection to central registration system). The ideal process would be a “2-Step-CoD”. First issuing to the last holder when receiving the vehicle. Second issuing to authorities as confirmation of finalization of the treatment of the end-of-life-vehicle. A strong surveillance and enforcement of the before mentioned proposals has to be ensured. This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector. No statistical gaps – no unknown whereabouts – no missing ELVs."	36
Only authorized / certified dismantlers are allowed to accept vehicles for the purpose of waste treatment and to issue a CoD. The CoD has to be mandatory for final de-registration of a vehicle (ideally by online connection to central registration system). The ideal process would be a “2-Step-CoD”. First issuing to the last holder when receiving the vehicle. Second issuing to authorities as confirmation of finalization of the treatment of the end-of-life-vehicle. A strong surveillance and enforcement of the before mentioned proposals has to be ensured. This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector. No statistical gaps – no unknown whereabouts – no missing ELVs.	37
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§ 2/Suggestion B: Also referring to the comments provided in the introduction of this questionnaire, BMW wants to point out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle	39

does not automatically become hazardous waste. § 2/ Suggestion G: There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it. However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	
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Comment on Suggestion B: Also referring to the comments provided in the introduction of this questionnaire, VW wants to points out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste. Comment on Suggestion G: There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it. However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	41
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Additional proposal (by VDA): A strong surveillance and enforcement of proposals 1+2 has to be ensured. This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector. No statistical gaps – no unknown whereabouts – no missing ELVs	44
ACEA VI.) on 1.3. Suggestions Page 12/§ 2/Suggestion B Also referring to the comments provided in the introduction of this questionnaire, ACEA wants to points out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product).In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste. ACEA VII.) on 1.3. Suggestions Page 12/§ 2/ Suggestion G There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it (please see comment box “ACEA XII” / ACEA comment on 3.3 suggestions E and F, for further details). However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	45
A strong surveillance/inspection and enforcement by authorities, for example the police, customs and municipalities has to be ensured (from an environmental-, work health- and competition point of view). This would steer the flow of ELVs in the correct channels and would avoid accepting and treating of vehicles / ELVs by illegal sector. Make sure that a scrapped car cannot get a second life (in another country for example). No statistical gaps – no unknown whereabouts – no missing ELVs. The system of temporarily deregistration in Sweden is too generous. When a car is temporarily deregistered in Sweden, you do not need to pay the tax, only a fee around 5 euros per year. This cost is too low! The temporary deregistration has led to that a lot of cars are being “forgotten”; they could be in use, stored in someone’s back yard, illegally scrapped or exported, no one knows. In Sweden, almost 1 out of 4 cars (of the total car park) are temporarily deregistered. Once in a while, the Swedish Transport Agency cleans the system, by administratively deleting cars when owner haven’t replied to a letter, being asked if they want the car to remain in the system.	46
Comment on 1.3. Suggestion B: Also referring to the comments provided in the introduction of this questionnaire, ACEA wants to points out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste. Comment on 1.3 Suggestion G: There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it (please see comment box “ACEA XII” / ACEA comment on 3.3 suggestions E and F, for further details). However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	47
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ACEA VI.) on 1.3. Suggestions Page 12/§ 2/Suggestion B Also referring to the comments provided in	49

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Comment on Suggestion B: Also referring to the comments provided in the introduction of this questionnaire, Porsche wants to point out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de- registered vehicle does not automatically become hazardous waste. Comment on Suggestion G: There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it. However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	51
The off road notification (SORN- in the UK) should be renewed by the owner annually or CoD submitted to ensure that records authorities' records are up-to-date and vehicles do not disappear into another statistical gap.	52
VI.) on 1.3, Page 12/§2/Suggestion B: We would like to point out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste. VII.) on 1.3, Page 12/§2/Suggestion G There should be a clear distinction between fees and refund systems (usually set up and operated by economic operators) and road taxation (a responsibility of the public administration). The automotive industry does not support the fees/refund system as there is no evidence of any environmental benefits of such systems – hence 5 rating is allocated to it (please see comment box XII / comment on 3.3 suggestions E and F, for further details). However, the continuation of road taxation seems to be an effective way of directing vehicles into the legitimate channels- hence rating 2 would apply for this part.	53
Like ACEA, the Danish Car Importers Association wants to points out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-	54

registration. A de-registered vehicle does not automatically become hazardous waste.	
Also referring to the comments provided in the introduction of this questionnaire, GROUPE PSA wants to point out that a “de-registered vehicle” is not necessarily an ELV and insofar not waste. Depending on the decision of the last owner, it could also remain in the status “vehicle” (=product). In this case de-registration will be followed by a re-registration. A de-registered vehicle does not automatically become hazardous waste.	55
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<b>2. Methods to achieve more complete reporting on extra-EU export and ways to distinguish between exporting ELVs vs. used vehicles</b>	
<b>2.1. Authorities</b>	
The competent authorities (in the meaning of the Waste Shipment Regulation) should strengthen their cooperation which shall aim at prevention and combating of illegal shipments of ELVs including coherent approach and effective system of information exchange.	1
It should be made attractive to register and de-register properly for all parties involved (including ATF) and to exchange cross-border information on imported and exported vehicles.	2
The ELV Directive should be amended after a revision of the Correspondents Guidelines No 9 has taken place and the content of these amended guidelines shall become legally binding at EU level. This amendment should focus on harmonisation of interpretation of terms especially considering what is meant by repair at reasonable costs in the light of Art. 28 of the Waste Shipment Regulation. There is a flow of vehicles to countries with lower standards and repair costs. It should be specified which repair costs are to be taken into consideration: repair costs in EU-Member State of dispatch in comparison to the actual value of the vehicle? average repair costs in the EU - how to be calculated and updated/ how to get this information? in any case exclusion of repair costs in non-EU members!).	3
Additional Note (C and D): EU should work to extend the useful life of vehicles in the eco-efficient way and without environmental risks. ELVs should be barred from extra-EU export and they must be treated in EU ATFs according to criteria of environmental eco-efficiency.	4
Comments related question_C_ This should be analyzed according to the legislation regarding free market and barriers to trade	5
Modify Suggestion 2.B: In preparation to legally binding regulations it is necessary to gather information on the experience in the usage of the guidelines by the competent authorities, to analyse them and to consider the conclusions. Discussions with experts show the interest in simplified criteria and decision schemes to enable efficient enforcement.	6
Correspondents Guideline No. 9 needs to be strengthened if it is to be made legally binding	7
Ensure complete list of vehicles exported retained for 10 plus years	8

In ELV Directive there should be similar provisions on minimum requirements for shipments than there are in WEEE Directive (Annex VI).	9
There should be legally provided a cooperation of national police forces (and Europol, Interpol) and the competent authorities (in the meaning of the Waste Shipment Regulation).	10
Additional proposal_CORRESPONDENTS' GUIDELINES No 9- Subject: Shipments of Waste Vehicles should be binding in the European and national legislation regarding the management of end of life vehicles. A major problem is establishing the criteria on which the evaluation will be made of a used vehicle.	11
For single-stage export processes: Establish an information obligation from the customs office of exit to the customs office of the country of origin of the vehicle. Explanation: We like to point out, that there is a relevant number of legal exports, that are unreported. These legal exports should be covered better by the statistics! A high number of transports of used vehicles, e.g. from Germany, via another EU country into a non-EU country is not covered by the non-EU foreign trade statistics: Vehicles from Germany which are exported in the single-stage process or exported by customs agents from another EU Member State (customs office of exit) are not systematically recorded by the German customs statistics (and hence are not included in the foreign trade statistics).	12
Fixed penalty fines for exporting End of Life as used	13
QUESTION A: The guidelines and definitions (referring to the waste shipments) should rather be done in the EU-level than nationally.	14
Additional proposal_EC should setup the safety standards that must be fulfilled by the used vehicles or used vehicles repairable. In the case of export from EU of used vehicles or used vehicles repairable older than 10 years, the customs must ask complete information regarding their destination. This information should ultimately reach at the competent authority which has the responsibility of implementing the ELV Directive.	15
Declaration by registered owner stating vehicle being exported	16
QUESTION E: It would be more important to improve the quality of inspections than to increase the absolute number of inspections. Inspections should be made risk based. This is also question of resources.	17
<b>2.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
These suggestions, although useful, do not address the core of the issue. This should be dealt with as far 'upstream' as possible - prevent the vehicles getting into the hands of inappropriate operators. As you move further downstream it gets ever more complicated to deal with in practice	1
Tighter control on cat b vehicles exported from auctions ie copart	2
ban on all export of vehicles over 5 years of age	3
Each country should be solely responsible for tracing ELV's in their country- this is why we should not be responsible for them as it can cause more problems.	4
Vehicles over 20 years old should be barred from extra-EU export, since the remaining life-span compared to the environmental risk is no longer appropriate	5
Definition ELV coupled to repair costs in land of export	6
older vehicles are cheaper and easier to maintain, we should not penalise poorer countries by insisting they live to our standards, We need to support and encourage a stepped improvement of such vehicles with better environmental outputs	7

C & D- ratings : maybe 10 y old not the appropriate lifetime to ban Extra EU-Export... Maybe 12- to 14 would be closer to the reality... + maybe the lifetime of 10 y must be the "referential" to implement accompanying measures to accept Export to Extra EU countries (eg technical control before export), so that free market conditions have to be assured for the trade of all goods without restricted limits to the age of the same goods going from a market to another one.	8
Used cars over 10 years might be exported to third countries only if they have passed a technical control	9
Tested Vehicles with appropriate documentation that these are roadworthy can get some kind of "export license"	10
After an insurance company declares a "total loss", such as totally destroyed vehicles due to an accident, the vehicle shall be automatically classified as an ELV	11
Although it is already included as suggestion 3.C. and although this section is talking about vehicles and not parts, since we are talking about exports outside the EU, it could be interesting to suggest that the re-used parts for export (ultimately would be all parts as suggested in 3.C) should be accompanied by the identification number and / or the certificate of destruction of the parent vehicle, as well as the authorization of the ATF to ensure that they have been recovered by an ATF.	12
Private people containers should be more closely monitored because a lot of ELVs are sent abroad on the name of second hand cars	13
Used cars might be exported to third countries only if they have passed a technical control/roadworthiness test. When used cars passed the technical control, a written confirmation shall facilitate the work of customs authorities.	14
Vehicles can be exported outside of the EU only if they passed the technical control.	15
In addition to question D: export numbers of older cars increase, if this is caused by fake export (cars registered as export, but illegally dismantled). This fraud can be prevented by supplementary regulations for older cars.	16
Used cars might be exported to third countries only if they have passed a technical control /test. When used cars passed the technical control, a written confirmation shall facilitate the work of customs authorities	17
Cars must have an ownership tax, like the tax that exists when it owns a house. Even if the vehicle does not circulate on the public highway tax should not be canceled, only when there is a sale of the vehicle or is sent for destruction, with a Certificate of Destruction (CD).	18
technical control before export	19
Used cars might be exported to third countries only if they have passed a technical control/roadworthiness test. When used cars passed the technical control, a written confirmation shall facilitate the work of customs authorities.	20
MS should establish a law which prohibits the export of used cars, until an expert confirms that the specific vehicle is a used-car and not an ELV	21
Used cars might be exported to third countries only if they have passed a technical control/roadworthiness test. When used cars passed the technical control, a written confirmation shall facilitate the work of customs authorities.	22
Used cars might be exported outside of the EU only if they have passed the roadworthiness test. It will be although necessary to harmonise the roadworthiness tests in the different MS.	23
Referring to suggestion A: Directive 2008/98/EC defines "waste" as any substance or object which the holder discards or intends or is required to discard. The transition from status "vehicle" to status "end-of-life vehicle" is clearly documented by existing and legally required CoD. Every additional legally	23



binding regulation is expendable.	
Vehicles can be exported outside of the EU only if they passed the technical control.	25
UE should make more difficult to export ELV abroad the UE. UE should recycle cars in the UE countries.	26
Insurance companies should only be allowed to sell cat b salvage to atf's and not salvage agents	27
Better description of parts and big bodyparts to avoid unnecessary trade barriers	28
E rating : National authorities should increase the nb of inspections in order to detect whether the controlled vehicle is 2nd Hand or suspected ELV	29
Cars without appropriate confirmation of road worthiness are ELV	30
We do not believe really much at the illegal export of ELVs but we think that many ELVs are shredded inside France without being deregistered	31
After an insurance company declares a "total loss", such as totally destroyed vehicles due to an accident, the vehicle shall be automatically classified as an ELV.	32
Suggestion E: Increased number of inspections is a positive tool even if a system with incentives would be implemented. Again this would be a clear signal that illegal activities are not accepted. Question related to who will ultimately pay for the inspections.	33
After an insurance company declares a "total loss", such as totally destroyed vehicles due to an accident, the vehicle shall be automatically classified as an ELV	34
Technical Total Loss is always ELV	35
After an insurance company declares a "total loss", such as totally destroyed vehicles due to an accident, the vehicle shall be automatically classified as an ELV.	36
After an insurance company declares a "total loss", such as totally destroyed vehicles due to an accident, the vehicle shall be automatically classified as an ELV.	37
If an insurance company declares a "total loss" for a damaged car (repair costs higher than the car value before the accident), the vehicle has to be classified as an ELV depending - the value of the car before the accident and the value of the damaged car, - the replacement value established by an insurance expert, - repair costs. Up to the different stakeholders (ATF, Car manufacturers, Insurance companies) at a MS level and/or at an EU level to study the adapted formula for calculating the limit beyond which a damaged car has to be considered as an ELV. In France, we think that the formula F hereafter should be analysed by the different stakeholders. • VR: Replacement Value established by an insurance expert • RC: Repair Costs • $F = RC/VR$ o If $F > \text{or} = 130\%$ , the damaged car is automatically considered as an ELV o If $F < 130\%$ , the damaged car has not to be automatically considered as an ELV.	38
Referring to suggestion C: Introducing a ban on old vehicles having more than 10 (or even 14) years is not acceptable; free market conditions have to be assured for the trade of all goods without restricted limits to the age of the same goods going from a market to another one.	39
Even good definitions ask for trained officials	40
Verification to enforcement officers should be made easier.	41
Comment on the "suggestion A": The Correspondents Guidelines No 9 cannot be considered as an operational tool: the document is too long and not adapted to a day-to-day use by the customs.	42

2.3. CMI (Car Manufacturers/ Importers)	
Suggestion A: Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by BMW in particular.	1
Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by ACEA in particular	2
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To Suggestion A: Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by us in particular.	4
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ACEA VIII.) on 2.30 Suggestions Suggestion A Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by ACEA in particular.	7
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The current legislation clearly states when vehicle becomes waste therefore further legislation is not required. In the spirit of harmonisation, any individual national regulations should be discouraged.	14
VIII.) on 2.30: Suggestion A: Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. We oppose any individual national regulations.	15
We agree with the following suggestion made by ACEA: "ACEA VIII.) on 2.30 Suggestions Suggestion A Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by ACEA in particular. "	16
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To Suggestion A: Directive 2008/98/EC defines “waste” as any substance or object which the holder discards or intends or is required to discard. The transition from status “vehicle” to status “end-of-life vehicle” is clearly documented by existing and legally required CoD. Every additional legally binding regulation is expendable. Individual national regulations are opposed by us in particular.	18
E: positive to increasing inspections on the export of waste (ELV's),	19
Suggestion C: The average age of ELV's in Europe results from high repair and maintenance costs in Europe. Vehicles can be used much longer. The environmental policy requires long-living products in order to save the resources and the environment. From an environmental point of view, it is more favorable to extend the life span of a vehicle by extra-EU export than to produce a new car. Introducing a ban on old vehicles having more than 10 (or even 14) years is not acceptable; free market conditions have to be assured for the trade of all goods without restricted limits to the age of the same goods going from a market to another one.	20
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Comment on Suggestion C and D: The average age of ELV's in Europe results from high repair and maintenance costs in Europe. Vehicles can be used much longer. The environmental policy requires long-living products in order to save the resources and the environment. From an environmental point of view, it is more favorable to extend the life span of a vehicle by extra-EU export than to produce a	22



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Suggestion C: the average age of ELV's in Europe results from high repair and maintenance costs in Europe. Vehicles can be used much longer. The environmental policy requires long-living products in order to save the resources and the environment. From an environmental point of view, it is more favorable to extend the life span of a vehicle by extra-EU export than to produce a new car. Introducing a ban on old vehicles having more than 10 (or even 14) years is not acceptable; free market conditions have to be assured for the trade of all goods without restricted limits to the age of the same goods going from a market to another one.	23
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In the spirit of circular economy, products should be used for as long as possible to preserve resources and the environment. The average age of ELVs in Europe results from high repair and maintenance costs in Europe. Vehicles can be used for much longer and vehicles in good working order should not be scrapped and banned for export only due to their age. Free market conditions need to be maintained for goods to be traded between markets.	33
IX.) on 2.36: Suggestion C: The average age of ELV's in Europe results from high repair and maintenance costs in Europe. Vehicles can be used much longer. The environmental policy requires long-living products in order to save the resources and the environment. From an environmental point of view, it is more favorable to extend the life span of a vehicle by extra-EU export than to produce a new car. Introducing a ban on old vehicles having more than 10 (or even 14) years is not acceptable; free market conditions have to be assured for the trade of all goods without restricted limits to the age of the same goods going from a market to another one.	34
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G: export is by definition not a single MS or national issue and needs to be done internationally	37
Suggestion 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. We see a contradiction in this sentence. The Waste Shipment Regulation is related to waste, while in the previous sentence we are speaking about inspections on exported vehicles, which not have become waste yet. We is in general in favour towards increased inspections on the export of waste (ELV's), and the establishment of MS inspection plans. However, as the current phrasing is related to the export of vehicles, we rated the suggestion as not worth for further consideration.	38
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To Suggestion 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. We see a contradiction in this sentence.	41
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Comment on 2.3 Suggestion 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. ACEA sees a contradiction in this sentence. The Waste Shipment Regulation is related to waste, while in the previous sentence we are speaking about inspections on exported vehicles, which not have become waste yet. ACEA is in general in favour towards increased inspections on the export of waste (ELV's), and the establishment of MS inspection plans. However, as the current phrasing is related to the export of vehicles, ACEA rated the suggestion as not worth for further consideration.	46
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rated the suggestion as not worth for further consideration.	
The industry supports the inspections of exported ELVs. However, the statement 2.3 E contains a contradiction which by suggesting that vehicles destined for export should be inspected on the basis on the Waste shipment regulation, which are not relevant to vehicles that have not been classed as waste.	51
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. It seems to have a contradiction in this sentence. The Waste Shipment Regulation is related to waste, while in the previous sentence we are speaking about inspections on exported vehicles, which not have become waste yet. PSA GROUPE is in general in favour towards increased inspections on the export of waste (ELV's), and the establishment of MS inspection plans. However, as the current phrasing is related to the export of vehicles, PSA GROUPE rated the suggestion as not worth for further consideration.	52
To Suggestion 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. We see a contradiction in this sentence.	53
<b>3. Enforcement techniques to reduce illegal dismantling of ELVs at dealers and repair shops (garages) and actions to improve ATF compliance</b>	
<b>3.1. Authorities</b>	
When a vehicle is being delivered to ATF in other country than origin country, some requirements should be established (e.g. confirmation that the vehicle had taken part in a road collision on the territory of other country than origin) - in order to prevent illegal shipment of vehicles with intention to discard the vehicles in ATFs on the territory of other countries.	1
Only a certified ATF should be able to deliver a(digital) CoD and this should be the only way to permanently destroy and de-register a vehicle.	2
In suggestion H please add information in which bases ATF should distinguish materials resulting ELVs from unauthorised dismantlers and materials resulting from motor vehicle repair.	3
Additional Note (J): On-site inspections must be an obligation of the competent authority, national, regional or local.	4
We support UK model with guidelines wich categorized cars. Which car is possible repair which car is necessary treated in ATF and also spare parts which is possible use after car cresh.	5
Establish working groups on national or regional levels against illegal dismantling and export of ELVs. In the cross-departmental working groups, representatives of all concerned authorities should participate (e.g. environmental, police, tax, permitting authorities on local, regional, national levels). The working groups should exchange experience on best practice, guarantee knowledge transfer, establish co-operation for efficient enforcement. The working groups should develop guidelines for efficient enforcement against illegal ELV treatment.	6
Spare parts can be sourced from sites other than ATFs	7
Fixed penalty notices on non compliant ATFs	8
QUESTION B: ATF needs to have a permit (in compliance with Art 23 of WFD), with specific requirements and inspection plan (risk based). We don't see any added value with this suggestion. QUESTION D: Both suggestions D and E mean some kind of deposit system. The benefits and costs	9



of deposit systems within ELV should be studied first.	
Electronic notification of CoD's in the national vehicle register is the key. No need for sending around CoD's between Member States. The electronic exchange of CoD's is already possible in EUCARIS.	10
In suggestion K please add information which EC institution is going to administer reports referenced in suggestion K.	11
Salvage vehicle auctions and online sales platforms have to guarantee that ELVs may only be offered to authorized buyers (ATFs).	12
Need to establish end of waste status for spare parts	13
Fixed penalty notice on registered owner for non compliance with COD	14
QUESTION F: We support the first sentence, but not the second (with reference to suggestion D). QUESTION J: The Action Plan should be done nationally risk based.	15
Consistent reporting structure for reuse, recovery etc	16
QUESTION L: This seems to be same as suggestion B? ATF and shredders need to have a permit (in compliance with Art 23 of WFD), with specific requirements and inspection plan (risk based). We don't see any added value with this suggestion.	17
<b>3.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
Aft exemptions should be abolished	1
If traced every 12 months would reduce issue. No paper trail- one organisation can trace all vehicles each year... Problem solved.	2
Some local authorities have hired a helicopter and flown over areas to identify unauthorised sites.	3
Recycling fees should only be reimbursed to last owner or ATF when a COD is issued	4
The premises owner of an ATF should be registered with the authorities as well as the tenant and should be responsible for good practice as well as the tenant/authorised sites. The owner as well as the tenant should face action. This would deter people from letting out sites to unauthorised breakers.	5
In Finland most of the ATF's are not dismantlers and there is no possibility for re-use. The shredders should need to report the amount of ELV's that have had the possibility for re-use and the amount of ELV's that have not been re-used.	6
export proposals for parts are not workable and seem to me to be driven by OE MANufacturers desire to sell new parts rather than to allow the sale of good secondhand / green parts to maintain the working life of older vehicles. Building a new lorry is NOT a GREEN solution	7
F rating : we are supporting the fact that ATF should notify the national vehicle register when CoD is issued, but are not supporting the reference to D rating. We are not supporting the recycling fee system as it has not proved its environmental steering effect, and since we are supporting free market conditions on the recycling market (no distortion) ----- K Rating : reports must be done to EC by the MS	8
The inspections should be more frequent to the non-authorized companies	9
Annual recycling fee to be levied, which is to be refunded against CoD to last owner	10
1. For instance, a recycling fee could be envisaged: a fee paid by the first owner when registering a new vehicle; afterwards, the fee should be reimbursed by the buyer to the seller, as long as the vehicle is sent to ATFs which will pay back initial fee to last owner together with CoD.	11

Option A : Have a look at Ökopool results from the last German UFO-Plan Vorhaben with the same intention than the European Study	12
National authorities should control websites selling second- hand products on the internet to detect spare parts sales by unauthorized individuals or facilities . One possible measure would be to communicate to those internet sites that among the requirements to upload an used part they must require the authorization as ATF of the seller .	13
A solution should be found when the last owner cannot present the papers of the cars because he lost it and doesn't want to pay for new papers to put its vehicle on recycling.	14
In order to create a suitable system of financial incentives, the options D and E need to be modified: EuRIC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported.	15
Suggestion B: Risks that requirements for ATF inspections will go beyond the scope of legal/illegal activities' check and include a number of other requirements (BREF, etc.). It is important that the authorities have the ability to perform such inspections, but in practice there is a need for specialists performing inspections.	16
"prime à la casse" to receive by the last owner receiving his COD. Funded by annual tax.	17
In order to create a suitable system of financial incentives, the options D and E need to be modified: FEDEREC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported. FEDEREC strongly supports the first part of suggestion F, but doesn't support the last sentence "For ELVs not registered in the country, suggestion D shall apply.", in accordance with the previous comment on suggestion D.	18
We believe inspections should be risk based on not based on common criteria. A one fits all solution is not appropriate	19
In order to create a suitable and sustainable system of financial incentives, the options D and E need to be modified:Stena Recycling supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall:- Be paid by the owner of the vehicle on an annual basis;- Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds;The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot	20

deregister the vehicle.No refund shall be received if vehicles are exported. In Norway there is a system already in place providing an incentive for the last owner to deliver the ELV to an ATF. This system in Norway is based on a fee at first registration. In Sweden it would be much more efficient to finance such a system based on an annual fee for each registered vehicle. MS should be free to choose the system that fits the conditions best in each MS and thereby securing a refund to the last owner when delivering the ELV to an ATF.	
The fee system is the best way to ensure a legal and effective dismantling, in cluding the dismantling of the glass fraction	21
Inspections on unauthorized plants should be increased (more or likely double them) and the inspections on authorized recycling plants should be harmonized at an EU level. For suggestion F, suggestion D has not to be applied. <	22
Referring to suggestion B: Requirements for ATF's are already regulated in Annex I of the ELV-directive. Further requirements are not necessary as long as these standards are followed and inspected. Nevertheless, it might be useful to develop a guideline to check the fulfilment of these requirements and to improve the enforcement of the law.	23
Selling ELV to the illegal dismantling stations should be banned. The last owner should be punished when sell car to the illegal dismantling station.	23
Study Shredder-Less techniques and monitoring flows. ie Japan	25
to point A): There should not be any reference to any possible sources; each Authority could choose their ones freely	26
New cars issued with recycling fee and refunded when recycled by ATF	27
Shredders should report, but how viable this is is questionable.	28
I am aware that one local authority is looking to use GIS to identify unauthorised sites.	29
paid recycling fees could be forwarded to another national fund if cars are exported to a MS with an ELV-fund.	30
Rating H : ATF should inform the monitoring organization (not directly the authorities) about such deliveries, in order to tackle illegal practices, with the cooperation of the sector (avoiding to have direct over-control actions toward well working ATFs	31
The CoD should the only way to cancel ELV	32
Austria has most of the reporting tools in place to make this happen	33
Option D BVSE refuses any kind of recycling fee. There are different reasons for our position. All established systems showed no positive effect in regards to environmental issues. Implementing financial incentives is more than difficult and corresponds with additional high administrative burdens that interfere with the market forces and thus the market's players. Also it introduces a significant momentum of rigidity, that contradicts the market's as well as the player's necessity to adapt to increasingly swift changes and developments on the international resource markets. Thus the implementation of such an incentive scheme disrupts the existing market balance on a functioning an competitive market without need.	34
Regarding suggestion 1.F the second part of the sentence makes no sense. If that second part is eliminated our rating would be a 1 .	35
The sale of second hand parts should be reserved to ATFs and automotive profesionales that can prove the traçability of the parts.	36
Modification of the option B in support of clarity: The EC should establish guidance for minimum frequencies of ATF inspections in order to support the implementation of existing legislation rather than putting additional burdens on companies in compliance with the legislation. This will in turn foster a	37



level-playing field throughout the EU and better tackle illegal dismantlers.	
Suggestions D and E: It would be much more efficient to introduce a low annual fee for each registered vehicle. This could be handled in the same system that the authorities use to collect the annual tax. Also it would be fair to split the cost on the different owners over the lifecycle of the vehicle.	38
Modification of the option B in support of clarity: The EC should establish guidance for minimum frequencies of ATF inspections in order to support the implementation of existing legislation rather than putting additional burdens on companies in compliance with the legislation. This will in turn foster a level-playing field throughout the EU and better tackle illegal dismantlers. The suggested guidance could be established under the form of a check-list, to encourage harmonized practices throughout the EU. Regarding the suggestion C, it seems important to guaranty a traceability on spare parts: however, VIN numbers or CoDs are not the appropriate way to do so. It is important to be able to trace the ATFs from which the spare parts are stemming from. For instance, in France, ATFs enter a reference for each ELV in the police register : this reference number is then reported on the spare parts.	39
The EC should establish guidance for minimum frequencies of ATF inspections in order to support the implementation of existing legislation rather than putting additional burdens on companies in compliance with the legislation. This will in turn foster a level-playing field throughout the EU and better tackle illegal dismantlers.	40
For Suggestion C, a real traceability on each reused part is necessary, proving that the part has been "produced" by an ATF (reference of the ATF, ATF's ELV number registered on the company's police book...). VIN number or COD would be too constraining.	41
to point E): It's better to separate the recovery fee from from the price the ATF pays for the ELV	42
Ebay, DoneDeal and other sites allow unauthorised dismantlers to sell parts on their sites. They should have to confirm where the parts originated from.	43
Enforcement needs to inspect both ATF's as possible locations for dismantling	44
Rating I : Shredders are not the ones who have to receive CoD. The monitoring organization has to receive these CoD. If they (shredders) receive the CoD, this CoD should be either a copy -and the original CoD at the Monitoring organization) either the original to the shredder, CoD which is to be registered at the Monitoring organization and at the De-registration service authorities	45
Option E BVSE refuses any kind of recycling fee. There are different reasons for our position. All established systems showed no positive effect in regards to environmental issues. Implementing financial incentives is more than difficult and corresponds with additional high administrative burdens that interfere with the market forces and thus the market's players. Also it introduces a significant momentum of rigidity, that contradicts the market's as well as the player's necessity to adapt to increasingly swift changes and developments on the international resource markets. Thus the implementation of such an incentive scheme disrupts the existing market balance on a functioning an competitive market without need.	46
Regarding suggestion 1.G it is important to know that such inspections are already normally made. The problem is that these inspections are carried out only at ATFs and legal shredders and authorities make few efforts to detect and prosecute illegal facilities. National authorities should devote more resources to this work of detection and prosecution of illegal facilities.	47
Private people should not have the right to sale on websites because of road security problems.	48
Modification of option "I" in order to properly reflect the practice by: "ATFs (instead of shredders) should report the number of treated ELVs and CoDs received." (Shredders are not able to this task, as they do not operate with CoDs and cannot provide the number of treated ELVs as efficiently as an ATF due to very practical reasons.) If properly phrased, EuRIC would have fully supported (1) such a proposal.	49

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to point F): isn't this already done in the EU?	52
<b>3.3. CMI (Car Manufacturers/ Importers)</b>	
Shredders and dismantlers are not allowed to accept pre-treated ELV's from other than ATF's which are publicly listed. Strong enforcement and surveillance is requested. This would lead to the positive consequence that the legal sector is strengthened.	1
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Shredders and dismantlers are not allowed to accept pre-treated ELV's from other than ATF's which are publicly listed. Strong enforcement and surveillance is requested. This would lead to the positive consequence that the legal sector is strengthened. It should also be the responsibility of the last owner, to make sure that it is a legal dismantler to whom she or he is handing over her/his ELV. In Sweden, many cars are simply abandoned by the last owner, and it is very hard to get the owner to pay for the consequences. (In Sweden, it is not clear that the person who is the owner of the vehicle according to the traffic registry, also is the owner from a legal perspective, and thus responsible for the vehicle.)	8
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Annex I of the ELV Directive details operational requirements for ATF's. Inspection criteria for ATF's should be based on these existing requirements.	14
Shredders and dismantlers are not allowed to accept pre-treated ELV's from other than ATF's which are publicly listed. Strong enforcement and surveillance is requested. This would lead to the positive consequence that the legal sector is strengthened.	15
The Danish Car Importers Association agrees with the following suggestion by ACEA: "1. Additional proposal: Shredders and dismantlers are not allowed to accept pre-treated ELV's from other than ATF's which are publicly listed. Strong enforcement and surveillance is requested. This would lead to the positive consequence that the legal sector is strengthened."	16
PSA GROUPE refuses any kind of recycling fee, even if it is refundable: 1/ Acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. 2/ A huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. 3/ Control of money is difficult; high administrative burden to prevent fraud and miss-use. 4/ A fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) PSA GROUPE with ACEA supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process and will lead to more reliable statistical figures.	17
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B: the already in place requirments need to be more /better inspected in all MS	19
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Comment on Suggestion B,L: Requirements for ATF's are already regulated in Annex I of the ELV-directive. Further requirements are not necessary as long as these standards are followed and inspected. Nevertheless, it might be useful to develop a guideline to check the fulfilment of these requirements and to improve the enforcement of the law. Comment on Suggestion D, E and F: VW refuses any kind of recycling fee, even if it is refundable: acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. A huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. Control of money is difficult; high administrative burden to prevent fraud and miss-use. A fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (Suggestion F) VW supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process and will lead to more reliable statistical figures.	22
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SMMT does not support any recycling fee, even if it is refundable as. - The financial benefits (large or small) do not guarantee to steer the vehicles in the legitimate recycling channels, while creating a complicated system.- A large amount of money would be tied-up for a long period of time (eg 15 years). To note the ownership of a vehicle changes hands many times (eg a vehicle has typically 2-4 owners) over the vehicles life-time.- It would create a significant amount of money for the authorities to handle, creating administrative burden and potentially requiring (costly) measures to guard against fraud or miss-use.- It would be difficult for the system to take account of changing market conditions, like fluctuating metal prices, especially over the life-cycle of a vehicle.A non-refundable fee would be used to subsidize a business which is currently self-financing and profitable. The level playing field would be distorted.However, SMMT suggests suggestion F, the introduction of electronic notification in the national vehicle register when a CoD is issued. This would improve the process and lead to more reliable statistical figures.	33
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Shredders and dismantlers are not allowed to accept pre-treated ELV's from other than ATF's which are publicly listed. Strong enforcement and surveillance is requested. This would lead to the positive consequence that the legal sector is strengthened. Requirements for ATF's are already regulated in Annex I of the ELV-directive. Further requirements are not necessary as long as these standards are followed and inspected. Nevertheless, it might be useful to develop a guideline to check the fulfilment of these requirements and to improve the enforcement of the law.	36
To Suggestion B: Requirements for ATF's are already regulated in Annex I of the ELV-directive. Further requirements are not necessary as long as these standards are followed and inspected. Nevertheless, it might be useful to develop a guideline to check the fulfilment of these requirements and to improve the enforcement of the law. To Suggestion E and F: We refuse any kind of recycling fee, even if it is refundable: - A) acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. - B) a huge amount of capital could be bounded over period of approx.	37

15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. - C) control of money is difficult; high administrative burden to prevent fraud and miss-use. - D) a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) we support the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process and will lead to more reliable statistical figures.	
F: 1 if not D is applied	38
Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	39
If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	40
Comment on Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	41
To Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	42
Suggestion K: if this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	43
Suggestion E and F Suggestion E and F VDA refuses any kind of recycling fee, even if it is refundable: acceptable amounts of money do not have the desired steering effect; even a) substantial amount of money does not guarantee, that the vehicle is returned but will b) bind significant amounts of money, a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. control of money is difficult; high administrative burden to prevent fraud and miss-use a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) VDA supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process and will lead to more reliable statistical figures	44
ACEA XIII.) on 3.3 Suggestions Suggestion K If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	45
Suggestion E and F ACEA refuses any kind of recycling fee, even if it is refundable: - acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money - a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. - control of money is difficult; high administrative burden to prevent fraud and miss-use - a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) ACEA supports the idea	46



of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process and will lead to more reliable statistical figures. In Sweden, as mentioned before, many cars are being dumped by the owner. This leads to huge costs for the state and the municipalities to take care of these cars. The fact that Sweden is a densely populated area, enhances transportation cost. A way to raise money for this work, is to increase the yearly traffic registry fee, with 1 EUR per car. In Sweden, 5,7 million EUR would be raised annually, and could well cover the cost.	
Comment on 3.3 Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	47
If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	48
ACEA XIII.) on 3.3 Suggestions - Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	49
If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	50
Comment on Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	51
Industry could only support this proposal if this means reporting ATFs'/shredders' performance by Member States to the European Commission, otherwise it would merely be creating unnecessary additional reporting obligations.	52
XIII.) on 3.3 Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	53
Suggestion K) If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	54
To Suggestion K: If this is meant as a report from the ATFs to MS authorities and a report from the MS to the European Commission, we would agree. Otherwise this would add unnecessary additional reporting obligations.	55

## 4. Public awareness and incentives for ELV tracking and environmental risks

### 4.1. Authorities

Only certified/accredited ATFs should be able to deliver CoD's	1
In suggestion C please add information what kind of administrative burden this suggestion will entail.	2
Additional Note (D): ATFs must be certified as a legal ATF by the environmental public administration as a Waste treatment plants and we consider that it is not necessary to be branded as a chain.	3
If labelling is introduced it must be user friendly	4
A producer financed fund (fee obligation based on the new registration) for the compensation of central and local (municipalities) authorities for external costs associated with disposal of abandoned ELV, and finance preventive measures to counteract illegal dumping. The fee to the fund should be linked to	5

how well the preventive measures are working, giving incentives to the producers to promote preventive measures.	
Awareness of topic on social media, Television, Schools etc	6
Not only an education initiative should be implemented to inform vehicle owners of a vehicle's environmental risks but also to inform about the owners' responsibilities.	7
QUESTION A: The costs and benefits of financial incentives (including deposit systems) should first be studied more carefully	8
To promote public awareness EC should make public awareness campaigns as done as in initiative to promote The European Week for Waste Reduction.	9
Huge posters on outskirts of cities	10
QUESTIONC: This suggestion would cause same kind of problems than suggestions B and F in the point 1.3. If the new owner of the car fails his duty to register the change of the ownership, it would be impossible to point out who is liable for payment (if the car is temporary de-registered). The Finnish Solicitor General has required that the car seller has to have the right to declare, that he has turned his car to "unknown", in the case where it is not possible to find out the new owner of the car.	11
To promote public awareness EC should make mandatory to the producers of motor vehicle to give information about de-registration of an end-of life vehicle to the vehicle owner.	12
Safety issue re "unknown whereabouts of ELVs" highlighted	13
<b>4.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
Financial incentives will definitely get results of people presenting information at EVL's.	1
Insurance Total Loss Vehicles - follow guidelines already in place in the UK and enforce the categorisation of damaged vehicles that are not repaired, and the most severely damaged vehicles MUST be broken for spares at ATF's and a CoD issued.	2
All forms of advertising should be used to notify the public of their obligations.	3
create a fund to encourage all the operators during periods when there is no economic sustainability of the recovery, upon proof of recovery and environmental compliance	4
Incentive for last owner can also be a price paid by the ATF if they can use many parts for reuse. For this producers info is necessary	5
The Government of MS's should be obliged to inform the public of recycling and the duties of car producers, since the Government is impartial.	6
The car owners should be informed about all the consequences, i.e. fines and environmental damages, if the car will not be delivered to an authorized operator	7
Annual recycling fee to be levied, which is to be refunded against CoD to last owner	8
Option A: It is the last owner's responsibility for dismantling in a legal manner. BVSE refuses any kind of recycling fee. There are different reasons for our position. All established systems showed no positive effect in regards to environmental issues. Implementing financial incentives is more than difficult and corresponds with additional high administrative burdens that interfere with the market forces and thus the market's players. Also it introduces a significant momentum of rigidity, that contradicts the market's as well as the player's necessity to adapt to increasingly swift changes and developments on the international resource markets. Thus the implementation of such an incentive scheme disrupts the existing market balance on a functioning and competitive market without need.	9

We would agree with suggestion 4.D provided that the distinction is granted by an official body. In Spain for example the Traffic Authorities (DGT) have established that ATFs must use a distinctive plate with the official DGT logo certifying that they are authorized to deregister vehicles from the official register.	10
include the end of life obligations into the education programme of the driving school	11
In order to create a suitable framework of financial incentives, the option "A" needs to be modified as there is no need to create additional funds or use public money: EuRIC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported.	12
Suggestion eventually modifying the option A: The treatment of an ELV by legal dismantlers can be financed by a fund to which fees are being paid during the lifetime of a vehicle (e.g. an annual tax on insurance or on technical controls).	13
A financial incentive should be linked to the vehicle, not to the owner, to prevent massive administrative systems. A deposit system can be less efficient than for instance a tax system.	14
Given the Portuguese reality that virtually no ELV is abandoned, we understand that ELVs which whereabouts are not known are those who have seen their registration canceled without a Certificate of Destruction (CD), i.e. that is not known what happened to the vehicle in question after the registration is cancelled.	15
"prime à la casse" for the last owner receiving his COD. Paid by a yearly tax.	16
In order to create a suitable framework of financial incentives, the option "A" needs to be modified as there is no need to create additional funds or use public money: FEDEREC supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible to promote the legal actors since the illegal actors cannot deregister the vehicle. No refund shall be received if vehicles are exported.	17
In order to create a suitable and sustainable framework of financial incentives, the option "A" needs to be modified as there is no need to create additional funds or use public money: Stena Recycling supports a simple framework to incentivise the enforcement and proper functioning of the existing CoDs requirement through an annual and refundable tax. This tax of a reasonable amount shall: - Be paid by the owner of the vehicle on an annual basis; - Be established by the Member States which can collect this tax together with existing taxes annually paid for each registered vehicle in order to avoid additional administrative burdens for the State and the car owners as well as the creation of additional unnecessary funds; The tax paid throughout the vehicle's lifetime will only be refunded, as an incentive, to the last owner of the vehicle when delivering the vehicle for proper treatment at its end-of-life stage in exchange of a CoD received from an ATF. Such a simple and clear framework will make it possible	18

to promote the legal actors since the illegal actors cannot deregister the vehicle.No refund shall be received if vehicles are exported.	
Suggestion C, it's very important to inform, educate consumers and empower them. It's seems to be the only way to improve the situation without collecting money (tax) throughout a new vehicle sale. We are convinced that the ELV sector is able to reach European targets within being profitable, - improving turnover (reused parts, recycled materials (non-ferrous metals, plastics,...) through automotive circular economy - and reducing management, drainage and dismantling costs (production efficiencies). An eco-fee isn't the solution and isn't necessary.	19
A financial incentive should be implemented for a vehicle's last owner that can be financed by a fund to which fees are being paid during the lifetime of a vehicle (e.g. an annual tax on insurance or on technical controls).	20
to point A): As explained at 3.3.E, it is better that the fee is paid by the Authorities to the last owner instead of be paid by the ATF to avoid influences on the price of the ELV	21
Education initiative is sufficient to reduce environmental risks.	22
ATF's need to be the only points that give out COD's. No other collection points unless directly related or owned to ATF's	23
National Networks of ATF's can organize themselves -see Austrian ARGE Shredder.	23
Include the information into the manual available at the sale of the car	25
We strongly support the concept of certified ATFs and see important benefits in the certification process. Certification and audits also facilitates the control and inspections from the authorities.	26
Having a car, means paying the taxes and other obligations. Only way to avoid this, is selling the vehicle. Incase it;s sold to an ATF, the ATF may decide to dismantle it and issue a COD.	27
Encourage communication campaign financed by car producer to inform the consumer on their obligations to recycle their car.	28
Increase the responsibility of the last owner. In Sweden, many cars are being dumped by the owners. This leads to unnecessary costs for the state and the municipalities to take care of these abandoned cars. An efficient and fair way to raise money for this work, is to increase the annual traffic registry fee (today it is only approximately 5 EUR). A reasonable increase of this fee would be sufficient to cover the costs.	29
<b>4.3. CMI (Car Manufacturers/ Importers)</b>	
Suggestion A: We refuse any kind of recycling fee, even if it is refundable: a. acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money, b. a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle, c. control of money is difficult; high administrative burden to prevent fraud and miss-use, d. a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) we support the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process.	1
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<p>Comment on Suggestion A: VW refuses any kind of recycling fee, even if it is refundable: Acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. A huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. Control of money is difficult; high administrative burden to prevent fraud and miss-use. A fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof.</p>	3
<p>To Suggestion D: We support the concept of certified ATFs and sees benefit in the certification process we would like to recommend to use the German concept as a possible best-practice approach. It is however unclear what is meant by “branded as a chain”. If this is considered to be a kind of mandatory obligation to join a specific cooperation or as a “franchising-concept” we do not see any additional benefit but a possible breach of anti-trust rules.</p>	4
<p>Suggestion A: ACEA refuses any kind of recycling fee, even if it is refundable. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) ACEA supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process.</p>	5
<p>Suggestion AVDA refuses any kind of recycling fee, even if it is refundable: acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money; a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle.-control of money is difficult; high administrative burden to prevent fraud and miss-use; -a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) VDA supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process.</p>	6
<p>ACEA XIV.) on 4.3 Suggestions – (same as ACEA XII) Suggestion A ACEA refuses any kind of recycling fee, even if it is refundable: - acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money; - a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle; - control of money is difficult; high administrative burden to prevent fraud and miss-use; - a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems; - Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) ACEA supports the idea of electronic notification of the national vehicle register in</p>	7



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<p>Comment on 4.3 Suggestion A: ACEA refuses any kind of recycling fee, even if it is refundable: Acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. A huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. Control of money is difficult; high administrative burden to prevent fraud and miss-use. A fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. However, (3.3 Suggestion F) ACEA supports the idea of electronic notification of the national vehicle register in case a CoD is issued as this would generally improve the process.</p>	9
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Comment on Suggestion A: Porsche refuses any kind of recycling fee, even if it is refundable: Acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money. A huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle. Control of money is difficult; high administrative burden to prevent fraud and miss-use. A fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof.	13
SMMT supports the concept of certified ATFs and sees benefit in the certification process. It is however unclear what is meant by "branded as a chain". If this is considered to be a kind of mandatory obligation to join a specific cooperation or as a "franchising-concept" we do not see any additional benefit but a possible breach of anti-competition rules.	14
XIV.) on 4.3, Suggestion A: We refuse any kind of recycling fee, even refundable: -- acceptable amounts of money do not have the desired steering effect; even a substantial amount of money does not guarantee, that the vehicle is returned but will bind significant amounts of money, - a huge amount of capital could be bounded over period of approx. 15 years. Ownership of vehicle is changing in average 2-4 times over life time of the vehicle., - control of money is difficult; high administrative burden to prevent fraud and miss-use. - a fixed amount of money cannot respond to changing market conditions (e.g. scrap prices), a variable amount of money will lead to even more administrative burden and legal problems. Non-refundable fees will subsidize a self-financing and profitable business. The economic competition and the self-regulation of the market will be distorted. In general: environmental benefits of recycling fees are incapable of proof. On 3.3 suggestion F we support the idea of electronic notification of the national vehicle register in case a CoD is issued as this would improve the proces.	15
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A: the financial incentive should be: if not deregisterd according to regulations, you keep paying your	17

car insurance and or road tax	
Suggestion D: We supports the concept of certified ATFs and sees benefit in the certification process we would like to recommend to use the German concept as a possible best-practice approach. It is however unclear what is meant by "branded as a chain". If this is considered to be a kind of mandatory obligation to join a specific cooperation or as a "franchising-concept" we do not see any additional benefit but a possible breach of anti-trust rules.	18
ACEA supports the concept of certified ATFs and sees benefit in the certification process we would like to recommend to use the German concept as a possible best-practice approach. It is however unclear what is meant by "branded as a chain". If this is considered to be a kind of mandatory obligation to join a specific cooperation or as a "franchising-concept" we do not see any additional benefit but a possible breach of anti-trust rules.	19
Comment on Suggestion D: VW supports the concept of certified ATFs and sees benefit in the certification process. We would like to recommend to use the German concept as a possible best-practice approach. It is however unclear what is meant by "branded as a chain". If this is considered to be a kind of mandatory obligation to join a specific cooperation or as a "franchising-concept" we do not see any additional benefit but a possible breach of anti-trust rules.	20
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PSA GROUPE supports the concept of certified ATFs and sees benefit in the certification process .	31
D: branded chain does not automatically mean quality or obeying the law. Certification, with independant inspections, is a better tool	32
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Before starting to lay down additional regulations on ELV side, PSA GROUPE recommends to first and generally harmonize the registration and de-registration procedure within the EU.	34
<b>5. Aspects to improve coverage and data quality when reporting on ELVs (possible revision of the Commission Decision on ELV annual reporting)</b>	
<b>5.1. Authorities</b>	
If Member States are obliged to register de-registration and CoD's, the annual reporting can be an extract of the EUCARIS data. This makes life much easier for all parties involved.	1
In suggestion B please add information what is covered by definition „vehicle parc“. Temporarily deregistrated vehicles should be part of „vehicle parc“.	2
Comments related question: _A_ It is necessary to require only that details that are really useful, because the volume of information is very high and the burden for companies and for authorities involved by data collection is also very high.	3
Reporting on exported material flows: The table headers of table 3 (“Total recycling [recovery, disposal] of (part of) end-of-life vehicles exported”) are not very clear. The reporting on exported material streams should be structured in a new way. The approach to integrate the data on exports in tables 1 and 2 should be considered. However, just one additional column indicating how many ELVs were exported (see suggestion 5.F.), does not seem to be sufficient. The reporting tables should include the disposal information [total mass, thereof recycling, recovery, disposal] on a) exported	4

ELVs (160104*), b) exported depolluted ELVs (160106), c) exported materials from depollution and dismantling (e.g. integrated in table 1), d) exported shredder output/ residues (e.g. integrated in table 2).	
Breakdown of the metals would be difficult as a shredder sources material from more than just ELVs	5
one PRI organisation per country	6
Amendment of the European LoW code, introducing a specific code for the ELV of the Directive scope. This suggestion aims to facilitate data treatment by excluding ships/vessels, trains and aeroplanes.	7
In suggestion J please replace „received“ to „issued“.	8
Comments related question_B_According to the reporting Decision, this information is required only when a MS chooses to report by the metal content assumption method, and not when the weighing method is used.	9
Add an ELV balance in the reporting sheets: a) number of ELV accepted by ATFs, thereof ELVs accepted from within MS and from abroad, respectively; b) number of depolluted ELVs (hulks) in the output of the ATF, thereof treated in MS and exported for treatment, respectively, c) number of depolluted ELVs (hulks) accepted by shredders, thereof accepted from ATFs within MS and from abroad, respectively.	10
If ATF not complying with data submission , ability to receive ELVs removed	11
Harmonize recycling and recovery definitions with Waste Framework Directive. Instead of suggestion 5.K., the definitions in the ELV Directive should be harmonized with the WFD.	12
Data submission from ATF with signed declaration from solicitor etc	13
<b>5.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
Tax books need to change so that illegal operators do not sign vehicles into the trade section 9 where they are lost forever	1
A lot of problems are created by allowing ELV to be exported into other member states, which creates a problem that is totally avoidable. Many of these questions fall into this category.	2
There should be a total ban on exporting ELV's	3
The registration system should cover all vehicles continuously. Even suspension should not mean deregistration	4
Reporting of re-use should also be required.	5
Rating H to J : only one harmonized method is the best way out	6
We know the number of de-registrations, we know the number of CoD's and the difference should have a targeted value	7
Answering proposal K is not possible as long as “other recovery” and “backfilling” are not clearly defined. In particular, the definition of “backfilling” for the Waste Framework Directive is presently under debate in the EU Parliament and the Council. Proposal K is also unclear regarding legal implications: would it imply that “other recovery” and “backfilling” would contribute for reaching the recovery target? Proposal K also presents the risk that some landfilling practices could be re-qualified as being “backfilling”, if the future backfilling definition would not be sufficiently clear. However it would be important to secure that Member States DO NOT include any backfilling tonnage in their Recycling (B1) tonnage, as backfilling is clearly not recycling!	8
1. In tables 1 and 2, an additional column should be added indicating how much materials recovered	9



from depollution and shredded were exported outside the member state in which the treatment took place.	
Modification of the option F in order to be supported: In tables 1 and 2.30, an additional column should be added indicating how many used cars (instead of ELVs) were exported	10
Regarding suggestion 5.F a new column is not necessary because the information would be redundant since this information is already included elsewhere in the report.	11
Modification of the option F in order to be supported: In tables 1 and 230, an additional column should be added indicating how many used cars [instead of ELVs] were exported.	12
Suggestion J: There is no statistics available of number of hulks treated by the shredder plants.	13
This EReg response is a generic one based on the activities and opinions of the registration authorities in several EReg Topic Groups. It is therefore possible that individual Member States, which are represented by their registration authorities in EReg, may be providing separate official responses to this consultation reflecting the specific arrangements and issues in their own countries.	14
Modification of F in order to be supported: In tables 1 and 2 the additional column should be added indicating how many used cars (instead of ELV) were exported	15
Modification of the option F in order to be supported: In tables 1 and 230, an additional column should be added indicating how many used cars [instead of ELVs] were exported.	16
Modification of the option F in order to be supported: In tables 1 and 230, an additional column should be added indicating how many used cars [instead of ELVs] were exported.	17
a clear reporting on the exact method used for the glass fraction is necessary. Glass is recyclable, so Recycling must be selected before recovery and must be so reported	18
Comments: Important differences exist between Member States in the way of recycling targets calculation and how the subsequent reporting is made. Hence, a common way of calculation and a common system on reporting are needed. The Commission should create a harmonised system for all Member States.	19
EC should treat the 100% mass which goes to the shredders as a recycling not only recovery.	20
Another method for calculate recycling rates like Japan.	21
Scrap metal dealers and shredders should only accept scrap vehicles from Atf's	22
Producers networks are voluntary which means they NEVER cover all ATF's. MS should report on total number of ATF's, number of ATF's in producers systems and estimated illegals.	23
Rating F : You have to avoid redundant information, which provides no benefit.	23
The recycling and recovery targets should be linked to the total number of de-registrations , so that the recycling targets relate to the potential volume of ELV waste.	25
Option I: This can only be the case if the CoD is obligatory	26
Suggestion K: Remark to be considered on the relevance of the word "recovery".	27
The only way to recycle the glass fraction is its pre-dismantling. Sorting of the glass fraction in post shredder technology allows only a 'downcycling recovery solution' like aggregates for road construction or engineering of landfill sites. Pre-dismantling in the contrary generates a clean fraction to re-introduce in the glass circular economy	28
Modification of the option F in order to be supported: In tables 1 and 230, 2 additional columns should be added indicating how many used cars and ELVs were exported	29
The actual method (Decision 293/2005) is failure when materials remains for past years ie Germany	30

(over 100%)	
<b>5.3. CMI (Car Manufacturers/ Importers)</b>	
Only one harmonised method without any choices is the only way out	1
Commission Decision on ELV annual reporting allows to use a metal content assumption only. To balance the risks of inaccuracies and the administrative efforts of achieving precise information it should be allowed to use further material assumptions, e.g for tyres, fluids, missing parts and non-metallic reuse. This approach is justified by similar material compositions of vehicles and vehicle park's respectively. The use of further material assumptions will also lead to a more harmonized monitoring in the EU.	2
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We have a well-functioning reporting model in Sweden. We think that the priority right now should be implementing the ELV-directive; enhancing the support from all relevant actors in the recycling chain,	9

like authorities, police, customs, all economic actors etc.	
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Commission allows the use of metal content assumptions within the ELV annual reporting. To balance the risks of inaccuracies and reduce administrative burden, further use of material assumptions should be allowed, eg for fluids, tyres, missing parts and non-metallic residue. This approach is justified by similar material compositions of vehicles and vehicle parc respectively. In addition, it would also create amore harmonised approach to monitoring.	15
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<b>6. Persistent Organic Pollutants (POPs) and ELVs</b>	
<b>6.1. Authorities</b>	
already at the moment and increasingly in the near future vehicles will contain electronic systems with a lot of sensitive data; new legislation on ELVs should contain regulations on the controlled deletion, removal or destruction of these data and also requirements for inspections thereof.	1
The approach to provide better information on POPs and "other substances not yet mentioned in the ELV Directive" (see suggestion 6.A.) is appreciated. In this context, a complete revision of IDIS as the central information system needs to be taken into account to suit current needs of dismantlers.	2
Enforcement officers briefed on detection of POPs	3
We would like to make two comments on the background information on POPs and ELVs.	4
For an effective depollution and dismantling, the suggested information requirement should be complemented by a corresponding dismantling requirement in Annex I of the ELV Directive. This should comprise the following relevant materials: a) POPs (either dismantling or thermal destruction), b) carbon fibre reinforced plastics (to enable recycling of this high grade plastic material and because incineration may cause problems), c) components containing elements of the EU list of critical raw materials (to enable separation and recovery), d) vehicle electronics (to enable high grade recycling of precious metals).	5
In the ELV Directive the requirements on treatment operations should be updated taking into account POP regulations (among others). E.g. according to WEEE Directive (Annex VII) all plastic containing	6

brominated flame retardants should be removed from separately collected WEEE.	
Hazardous substances and POP's (which are not allowed to be recycled) in ELV's should be taken into account when defining recycling targets for ELV	7
<b>6.2. Others (Citizens, Industry, not-for-profit or academic organisation (exc. Car Manufacturers/ Importers))</b>	
Essential to reduce environmental problems.	1
IDIS is absolutely worthless for ATF's	2
VM's must be forced to advise which catalytic convertors are hazardous	3
Manufacturers need to have the ability to advise which Catalytic converters contain RCF.	4
If a problem is fasing out by itself, how much effort needs to actively tackle this problem?	5
IDIS should provide safety information about the e-vehicle components, specifically about the traction battery - for the protection of emergency services and ATF's	6
Make sure that the downstream flow goes to appropriate recyclers that deal professionally with the separation of contaminated materials	7
BVSE always supported an implementation of a pragmatic and risk-based approach, especially for trace elements or organic molecules, which are very technically very difficult or even impossible to remove. In practice, this means optimising requirements stemming from different legislations to avoid disproportionate obligations hampering recycling and taking into consideration both the matrix in which substances are present and the destination of recycled materials. It equally means fostering eco-design to address issues arising from the interface between the waste and the chemical legislation at design stage and not when products reach the end of their life. Furthermore, BVSE supports, for the benefit of predictability, the current legislative framework stating, once an ELV is depolluted, depolluted fractions are non-hazardous implying that POPs should workably be addressed at dismantling stage. BVSE calls for an improved interplay between waste and chemical legislation to stop current unvertainty which hampers recycling an ultimately the shift to a circular economy.	8
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The principle would support recycling. Nevertheless, reserves regarding whether car manufacturers have or not this information. Or as chemical legislation is ever changing, non- hazardous substances at the time cars are manufactured can become hazardous at the time cars become ELVs. Or IDIS is or is not the right instrument to tackle POPs issues. Also IDIS is used in a very limited way in practice by ATFs. Or incidentally, it would tighten depollution obligations for ATFs. Or it would be much harder to control a process based on increased dismantling, storage and transportation of dismantled parts. Also such a solution would mean significantly higher costs in the processes.	10
pragmatic risk-based approach.	11
FEDEREC always supported an implementation of a pragmatic and risk-based approach, especially for trace elements or organic molecules, which are technically very difficult or even impossible to remove. In practice, this means optimising requirements stemming from different legislations to avoid disproportionate obligations hampering recycling and taking into consideration both the matrix in which	12

substances are present and the destination of recycled materials. It equally means fostering eco-design to address issues arising from the interface between the waste and the chemical legislation at design stage and not when products reach the end of their life. Furthermore, FEDEREC supports, for the benefit of predictability, the current legislative framework stating, once an ELV is depolluted, depolluted fractions are non-hazardous implying that POPs should workably be addressed at dismantling stage.	
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INDRA always supported an implementation of a pragmatic and risk-based approach, especially for trace elements or organic molecules, which are technically very difficult or even impossible to remove. It has to be included in the IDIS database only if it's really possible to remove and treat these chemicals.	14
IDIS should contain more information about the different types of materials (plastics)	15
ATF don't use IDIS or aren't interested.	16
"Potential pollutants" should also be understood as those whose following steps on the treatment process might end with polluting results (like some organic materials)	17
Exporting ELV causes another problem- the potential risk of to the environment, that of pollutant being leaked into the environment from leaking oil from containers when being moved.	18
Sparepart datas should be available for the safe reuse	19
Use this field to insert EuRIC steady position on the interplay between waste & chemicals (sound scientific risk based approach considering bioavailability which depends of the matrix in which substances are and not simply the fact that hazardous substances can be detected).	20
Carproducers should hand out sparepart datas and crossreferences	21
Call for an improved interplay between waste and chemical legislation to stop current uncertainty which hampers recycling and ultimately the shift to a circular economy. Link current framework according to which once an ELV is depolluted, depolluted fractions are non-hazardous implying that POPs should workably be addressed at dismantling stage.	22
<b>6.3. CMI (Car Manufacturers/ Importers)</b>	
Suggestion A: For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, we are ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	1
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VW comment on Suggestion A: For clarification: The issue POP does not fit into the scope of this study and due to its complexity, we require to deal with that subject area separately. However, VW is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	3
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ACEA XIX.) on Introduction and 6.3 Suggestions Suggestion A For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, ACEA is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	7
For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, ACEA is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	8
Comment on 6.3 Suggestion A: For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, ACEA is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	9
Suggestion A For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, ACEA is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	10
ACEA XIX.) on Introduction and 6.3 Suggestions - Suggestion A: For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. However, ACEA is ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	11
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XIX.) on Introduction and 6.3, Suggestion A: For clarification: The issue POP does not fit into the scope of this study and due to its complexity, automotive industry requires to deal with that subject area separately. We are ready to prepare and provide additional information and evidence based argumentation to address POP related questions with regard to the recycling process.	14
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<p>On 1.1 Background Information: Paragraph 1: Before starting to lay down additional regulations on</p>	<p>29</p>



<p>ELV side, we recommend to first and generally harmonize the registration and de-registration procedure within the EU. On 1.1 Background Information, paragraph 3: As explained in the text national competent authorities for ELV reporting do not have information on intra-EU export/import of used vehicles – even if this information should be available to vehicle registration authorities. This statement perfectly shows, that it is unjustified to speak about “missing ELVs” or “illegal export of ELVs”. We therefore advocate to solve or at least clarify remaining statistical uncertainties and gaps to objectify the discussion about the “unknown whereabouts” and to improve national enforcement before adding unnecessary new requirements for ELVs. On 1.1 Background Information, paragraph 4, In the background information it is stated that vehicles become ELVs when they are no longer (economically) repairable. This statement is wrong. Automotive industry requests to correct it. With reference to existing Waste-Framework-Directive and ELV-Directive, it is the last owner who decides, whether a vehicle will become an ELV. The last owner is always free to decide to repair his vehicle even when this would not be economically viable.</p>	
<p>General comment to 1.1 Background Information (paragraph 4): In the background information it is stated that vehicles become ELVs when they are no longer (economically) repairable. This statement is wrong. Automotive industry requests to correct it. With reference to existing Waste-Framework-Directive and ELV-Directive, it is the last owner who decides, whether a vehicle will become an ELV. The last owner is always free to decide to repair his vehicle even when this would not be economically viable.</p>	30
<p>ACEA IV. on 1.1 Background Information: Paragraph 3:As explained in the text national competent authorities for ELV reporting do not have information on intra-EU export/import of used vehicles – even if this information should be available to vehicle registration authorities. This statement perfectly shows, that it is unjustified to speak about “missing ELVs” or “illegal export of ELVs”. ACEA therefore advocates to solve or at least clarify remaining statistical uncertainties and gaps to objectify the discussion about the “unknown whereabouts” and to improve national enforcement before adding unnecessary new requirements for ELVs. ACEA V. on 1.1 Background Information: Paragraph 4: In the background information it is stated that vehicles become ELVs when they are no longer (economically) repairable. This statement is wrong. Automotive industry requests to correct it. With reference to existing Waste-Framework-Directive and ELV-Directive, it is the last owner who decides, whether a vehicle will become an ELV. The last owner is always free to decide to repair his vehicle even when this would not be economically viable.</p>	31