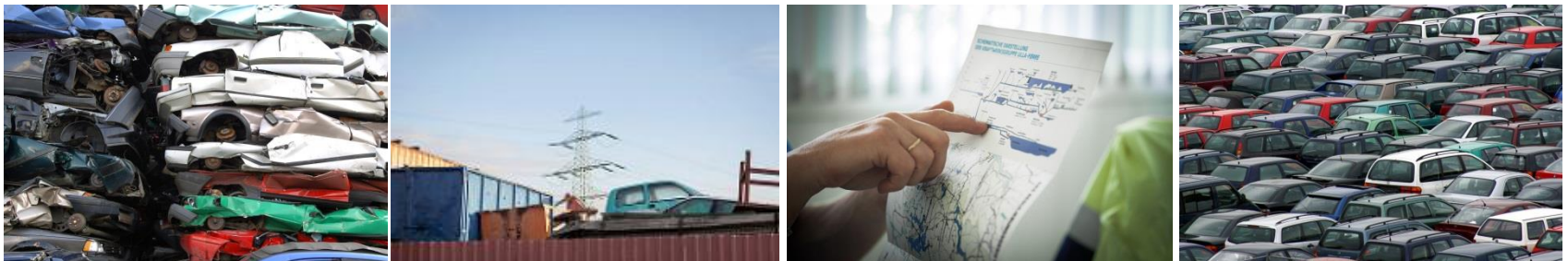


Situation of ELVs and unknown whereabouts in the EU

Stakeholder workshop: Assessment of the implementation of the ELV Directive (2000/53/EU) with emphasis on the ELVs of unknown whereabouts

Dr.-Ing. Georg Mehlhart

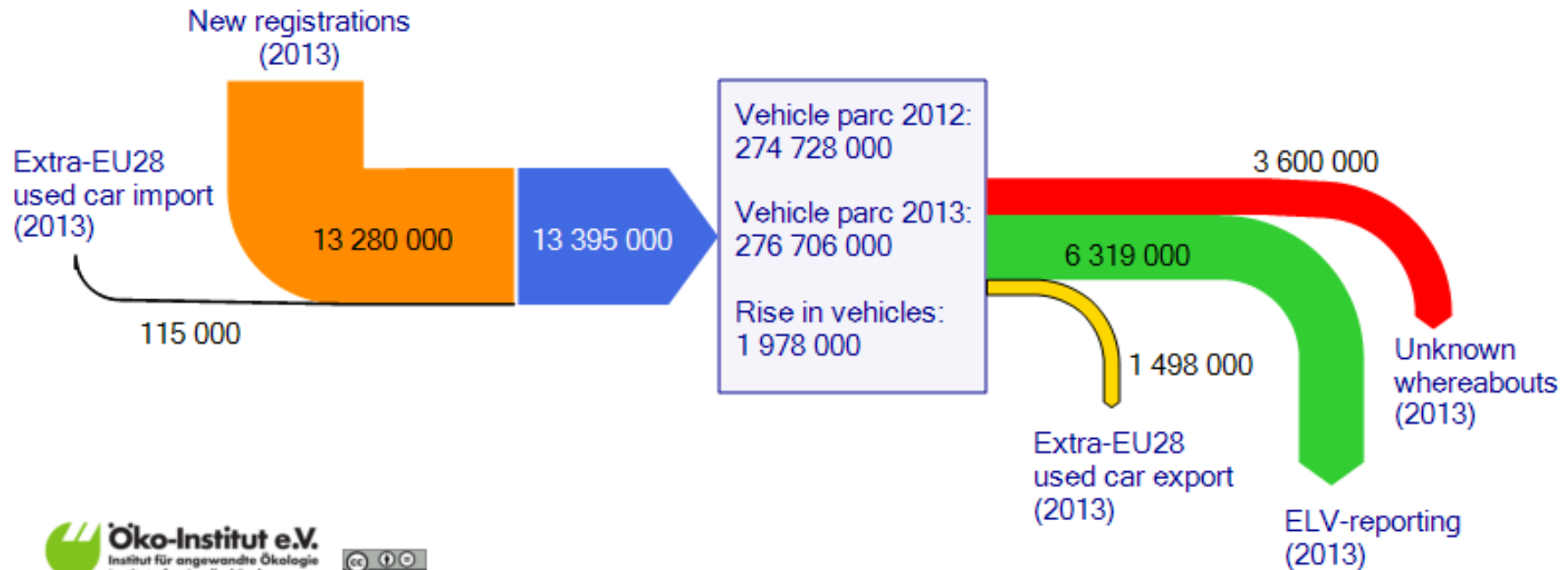
Brussels, 21 November 2016



Agenda

1. EU balance for ELVs, registered vehicles, imports/ exports
2. Monitoring by country:
 - 2.1. Vehicle stocks
 - 2.2. Imports and exports of used vehicles
 - 2.3. Limited relevance of the Certificate of Destruction
4. Conclusions

1. EU Balance (1): ELVs, registered vehicles, import / export: 2013



1. EU Balance (2): What are the concerns?

- **3.4 to 4.6 million vehicles / ELVs per year** are not reported;
- Environmental and human health concerns:
 - Spilled or burned engine/ gear oil.
 - Unsafe FCHC handling from air conditioners.
 - Other liquids from ELVs.

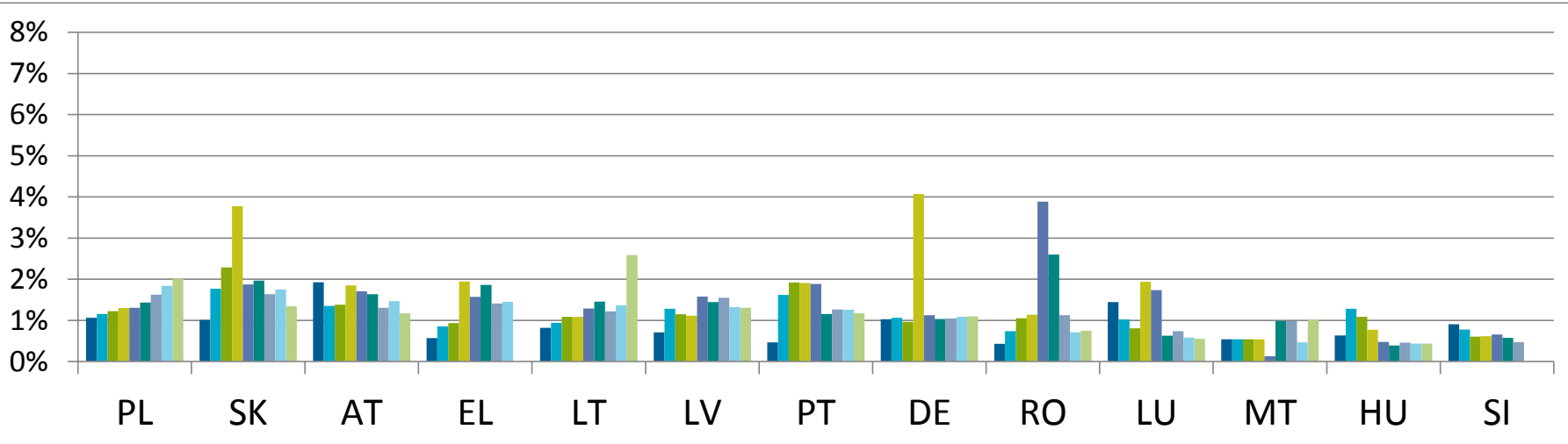
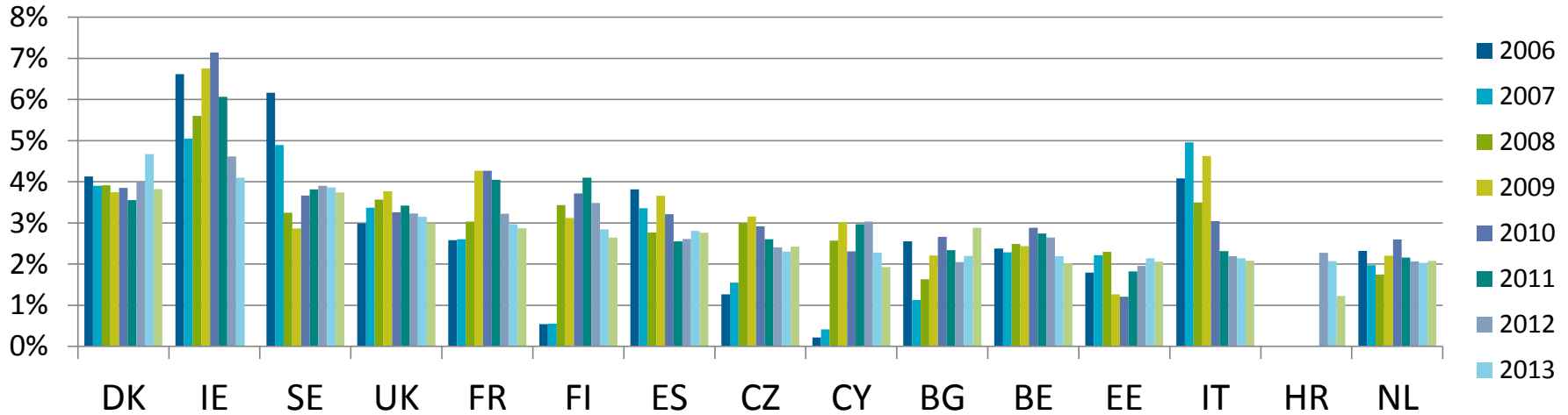
In total 20 to 55.2 million litres of hazardous non-fuel liquids

- Unsafe handling of the acid and the lead from lead-acid batteries.
- Unsafe treatment of other components, e.g. burning of plastics / rubber
- Complaints about illegal treatment within Europe.
- Illegal Export of ELVs to non OECD countries

1. EU Balance (3): Different options for unknown whereabouts

- ❑ More net export of used vehicles to extra EU.
- ❑ More export of ELVs to extra EU (to non OCED: **illegal**).
- ❑ **Unreported** treatment in Authorised Treatment Facilities (ATFs) and shredders (**illegal**).
- ❑ Treatment within the EU, **but not in ATFs** (**illegal**).
- ❑ Stolen: we estimate 120.000 vehicles stolen and not found again: only 3% of the gap (minor contribution only)

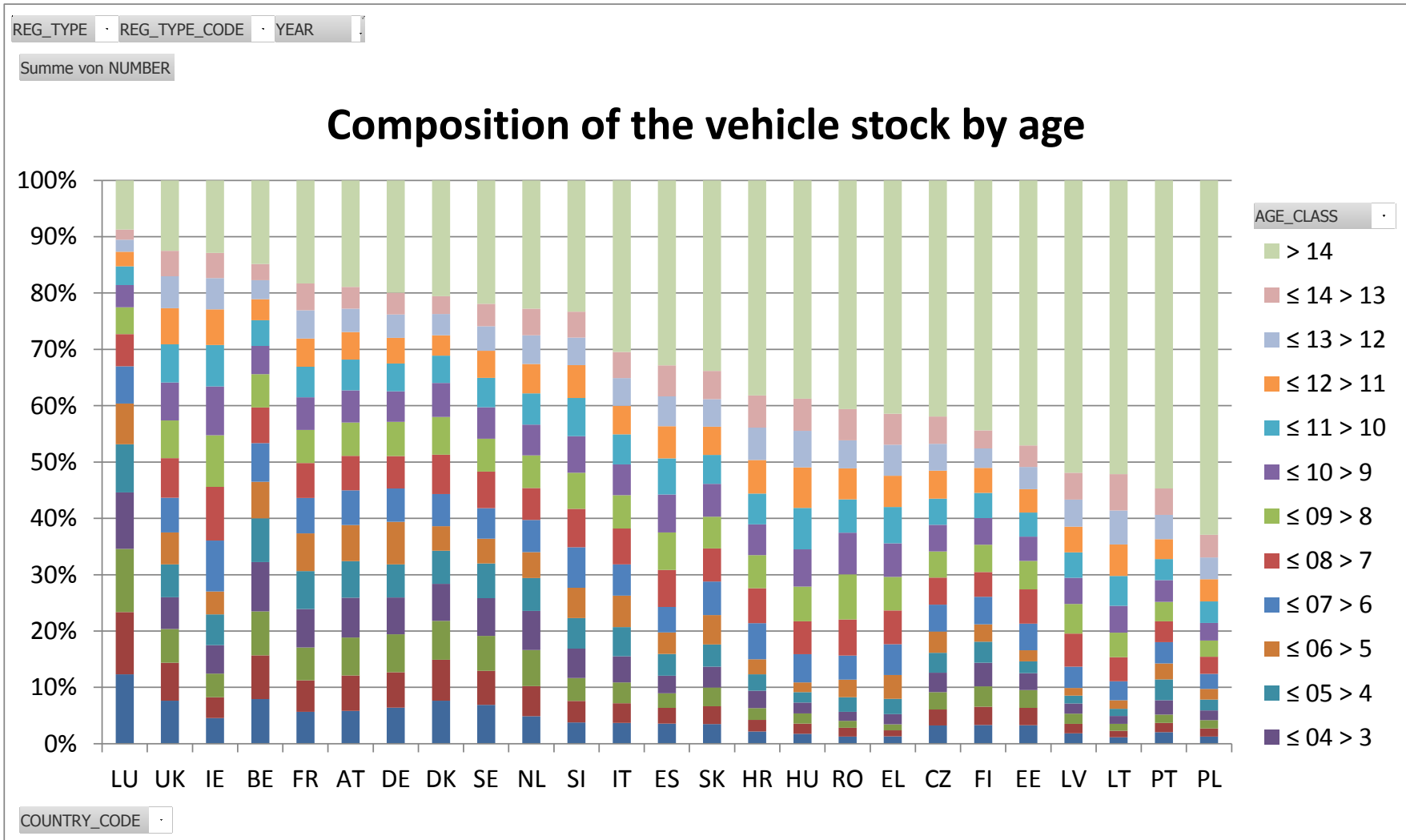
2. Monitoring per country: ELVs per registered vehicle (sorted by value for 2013)



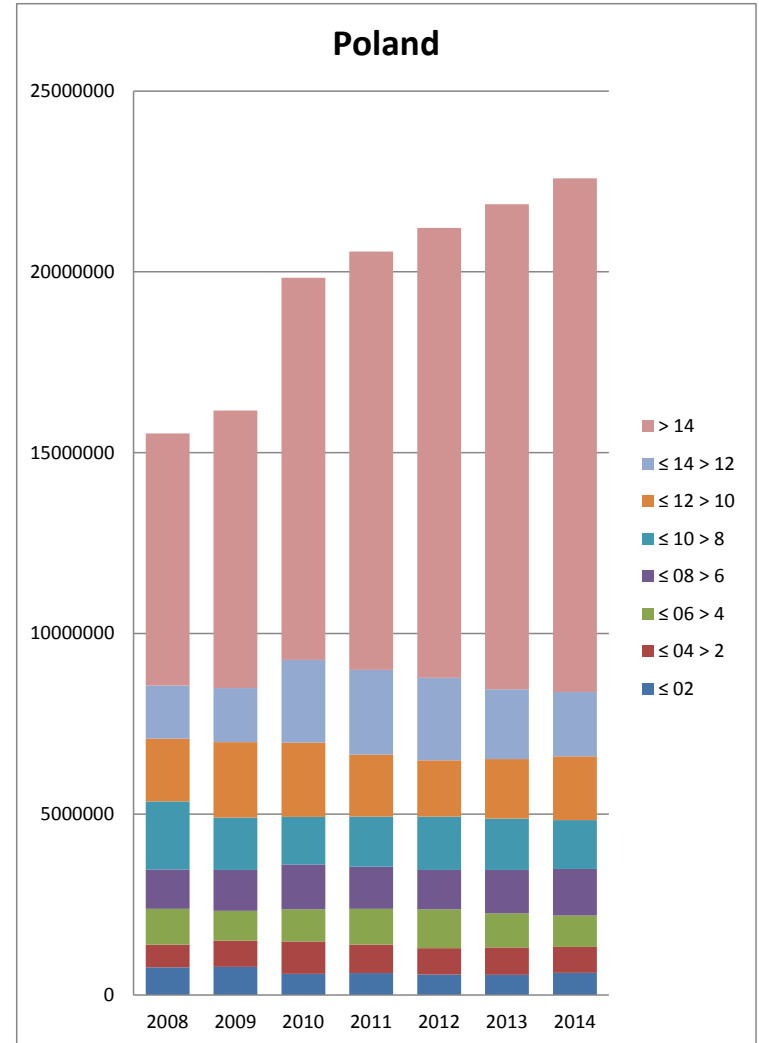
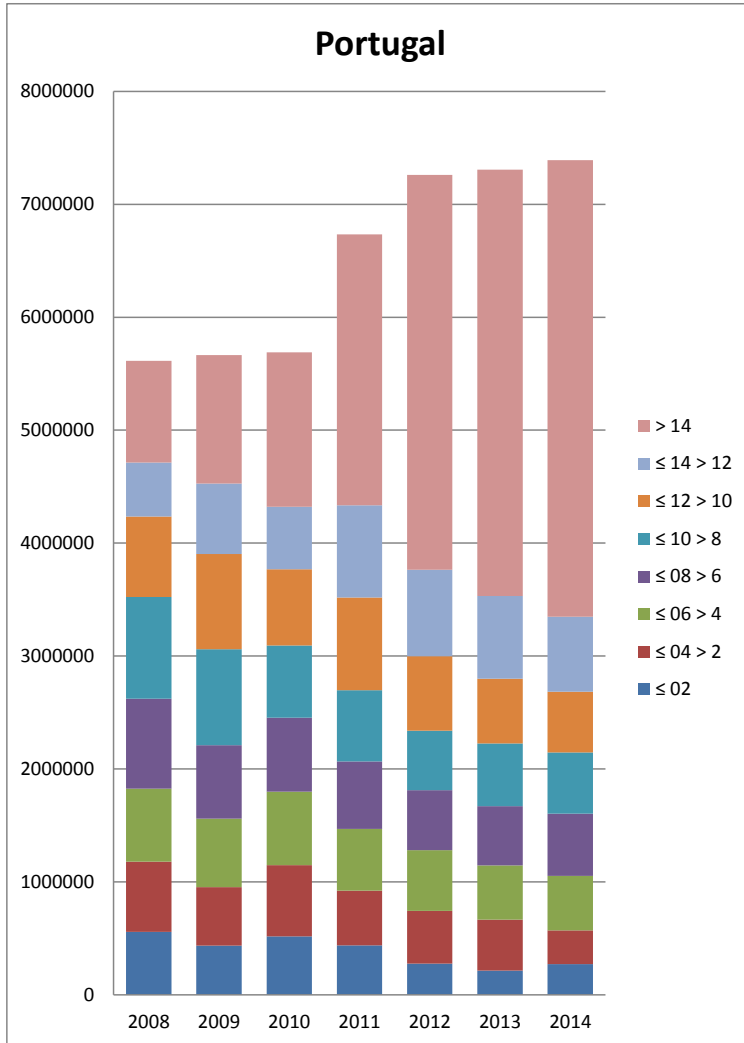
2. Monitoring by Country (1)

1. Observations from detailed data on vehicle stock:
 - a) Some not available
 - b) Some not plausible
 - c) For some countries important details are not accounted
 - d) For some countries the reported number of ELVs is higher than the number of CoDs.

2.1a. Vehicle stock: Composition by age for the year 2014

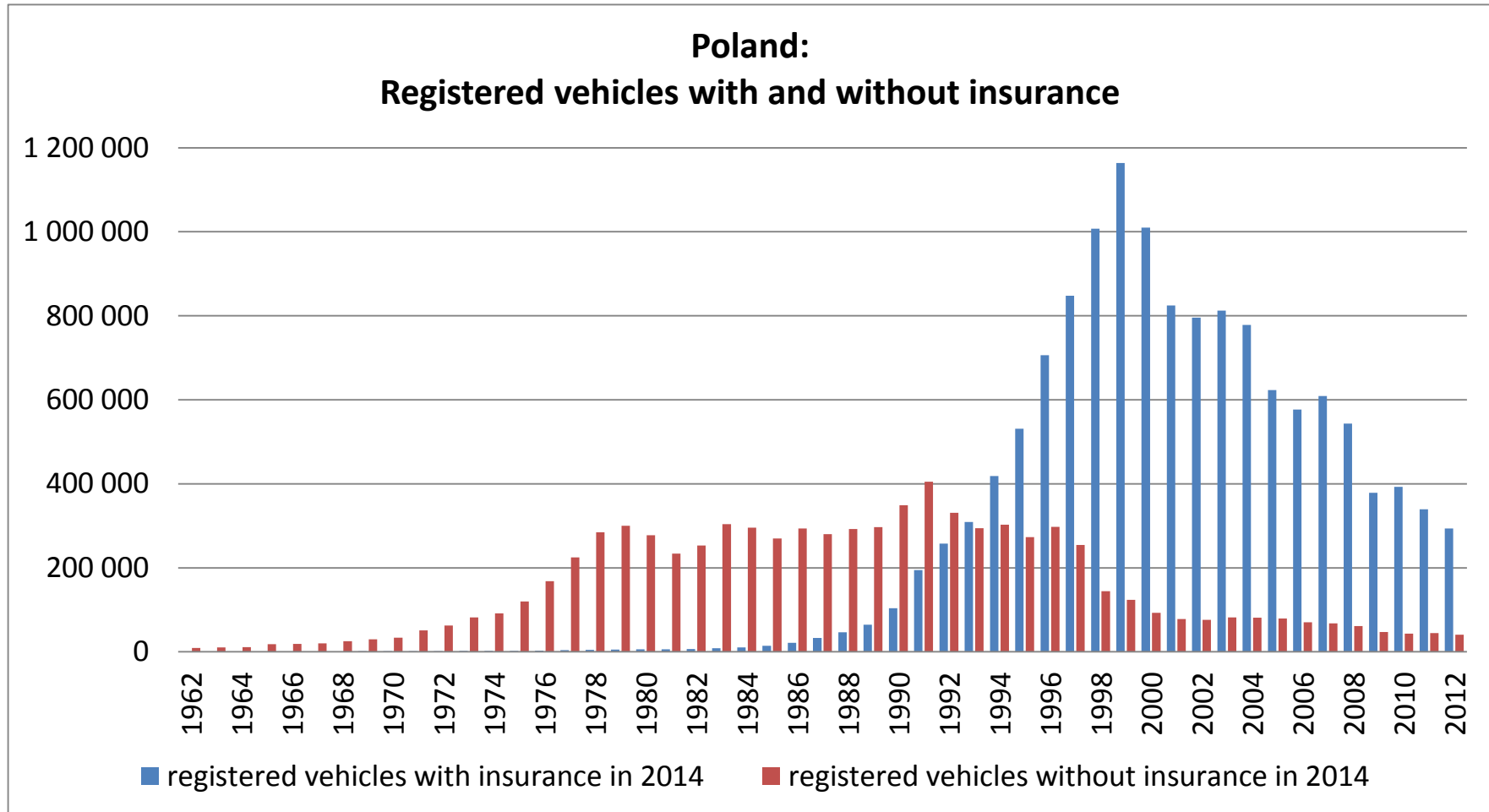


2.1b. Vehicle stock: Composition by age for PL and PT



Source: POLK

2.1b. Vehicle stock: Overestimation of the European vehicle stock



2.1c. Vehicle stock: Distinguish deregistration and final deregistration

The German Case

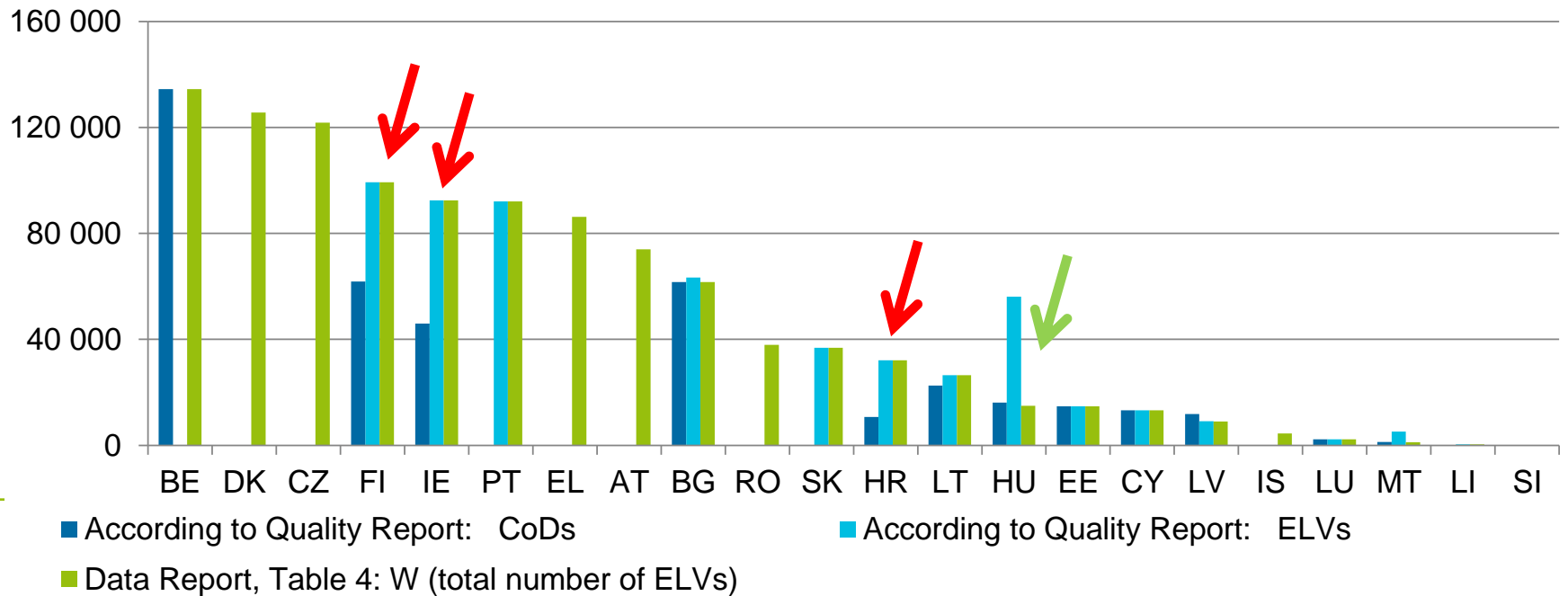
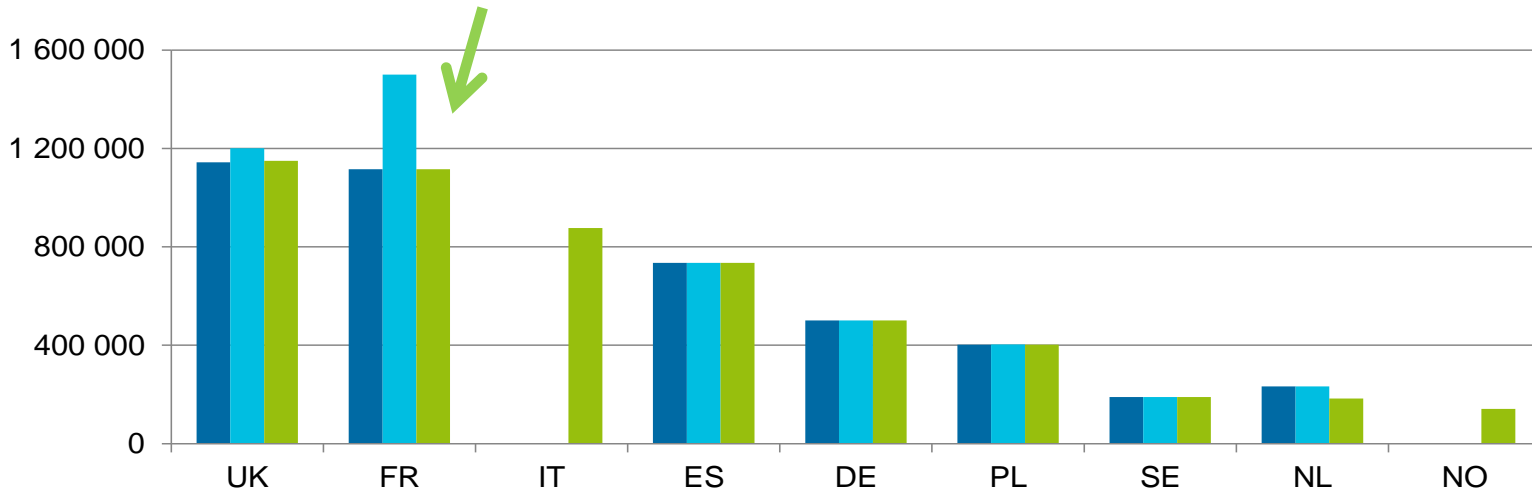
In 2006, Germany stopped distinguishing between “final de-registration” and “temporary deregistration”.

Beginning with 2007, Germany provides an estimate :

- Assumption (2007 to 2013): 40% of M1 deregistrations are considered for final deregistration.
- Assumption for 2013 / 2014: 33.3% of M1 and 41.4% of N1 are finally deregistered.

Germany deletes the data from the database when a vehicle is deregistered for more than 7 years.

2.1d. Vehicle stock: CoDs and ELVs reported (2013)



■ According to Quality Report: CoDs

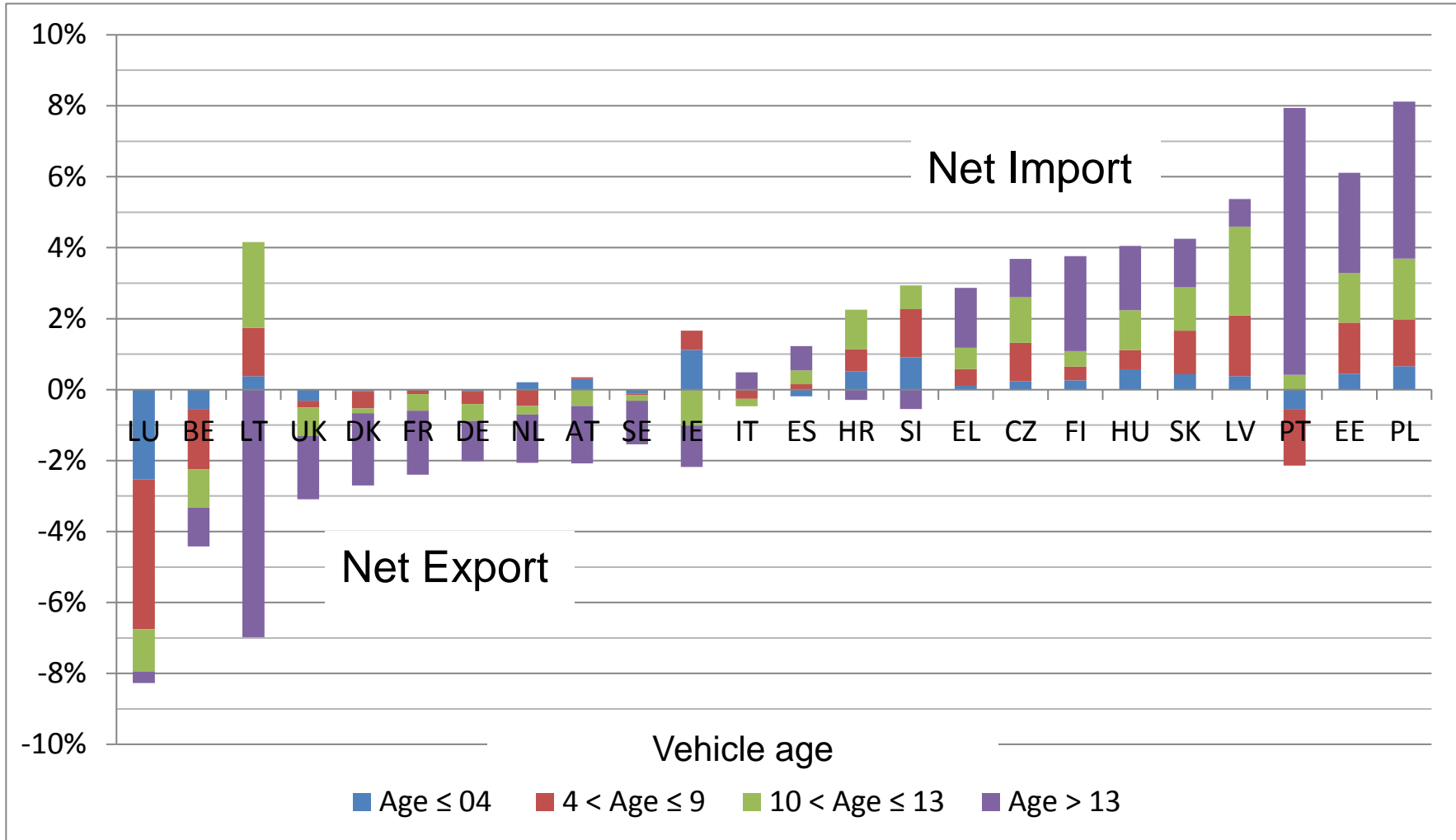
■ According to Quality Report: ELVs

■ Data Report, Table 4: W (total number of ELVs)

2. Challenges for the monitoring by Country (2)

2. Observations from monitoring imports / exports of used vehicles, effecting the number of ELVs generated on the national territory:
 - a) Relevance by country
 - b) Sources for data on Intra-EU import / export
 - c) Sources for data on Extra-EU import / export
 - d) Sources used by the countries for reporting
 - e) Secondary aspect: Distinguish ELVs from used vehicles

2.2a. Import / Export Model: Relevance by country, percent of stock



2.2b. Import / export: Sources for data on Intra-EU import / export

- Data from FTS surveys on intra-EU trade are not reliable for reporting on used vehicles.
- Article 5 (2) of Directive 1999/37/EC stipulates: *re-registering a vehicle previously registered in another Member State: the MS of destination shall, within two months, inform the authorities of the Member State which delivered the certificate of its withdrawal.*
- Comparison of re-registrations and FTS statistics on intra-EU trade by country might give reasons for further evaluation.

2.2c. Import / export: Sources for data on Extra-EU import / export

- Data from customs services on extra-EU trade are more reliable than the data for intra-EU trade.
- Need for agreements with relevant extra-EU countries to exchange information about re-registrations.
- Need for procedures for the reporting from transit with final extra-EU export.

2.2d. Import / export: Sources used by the countries for reporting

- In 2016: 26 countries (of 31) provided a Quality Report accompanying the data (published by Eurostat)
- 12 are unable to report on export (neither intra nor extra)
- 13 reported numbers on export based on Foreign Trade Statistics or without explicit source or other unexplained estimations.
- One country referred to the data exchange for reregistration across Europe according to Art. 5 (2) of Dir. 1999/37/EC
- Countries do not even use the available sources to address this aspect.

2.2e. Extra-EU import / export: 2ndary aspect: Distinguish ELVs from used vehicles

Current situation:

- Correspondents Guidance No 9
- New: inspection plans for the Waste Shipment Regulation.
- European cooperation for enforcement (IMPEL, Europol, Interpol)

Improvement:

- Make application of Correspondents Guidance No 9 binding.
- Establish procedures requiring documents for exporting “old” vehicles (e.g. > 14 years)

2. Challenges for monitoring by Country (3)

For many countries

- CoDs are not necessary for de-registration

nor

- to get rid of the owners obligation to support the monitoring of a vehicle.

This loophole supports illegal operators.

4. Conclusions (1)

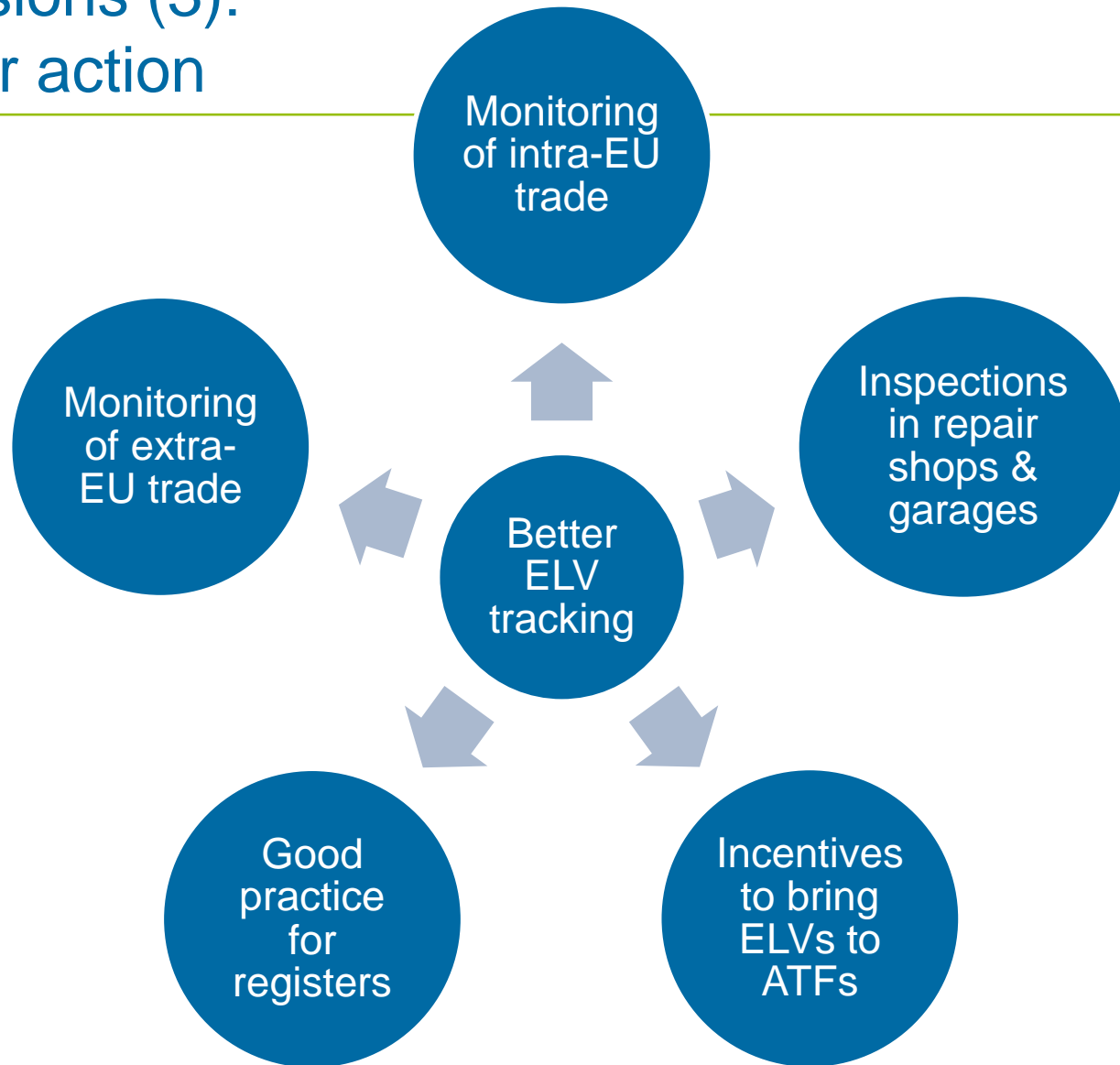
1. Monitoring the enforcement of the ELV Directive at national level is currently not possible and needs additional data.
2. Vehicles are not well tracked:
 - a) within the EU (“intra-EU import/ export”)
 - b) for extra-EU export; the effects of transit need particular attention
3. National vehicle registries need more attention.
4. The MS should take stock of the option to report on re-registration within the EU Member States.

4. Conclusions (2)

5. A relevant number of ELVs is dismantled in non-certified treatment facilities (ATFs) and/or without CoD.
In consequence more inspections are needed to direct vehicles to the ATF. (It is not only about the “improvement of data”!)

6. Changes and improvements might be supported by incentives and/ or penalties for the last holder / owner, directing the vehicles to ATFs.

4. Conclusions (3): Sectors for action



Thank you for your attention!

Questions or remarks



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