

ELVs and unknown whereabouts: Results of the public consultation

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

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Brussels, 21 November 2016



Agenda

- 1. Introduction to ELV public consultation and questionnaire**
- 2. Contributors**
- 3. Evaluation of responses**

1. Introduction to ELV public consultation and questionnaire

Duration: 12 weeks, 29 June to 21 September 2016

Recipients' groups:

1. European citizen
2. Representative of a public authority – Member State, regional or local competent authority
3. Industry, not-for-profit or academic organisation (i.e. all other stakeholders)

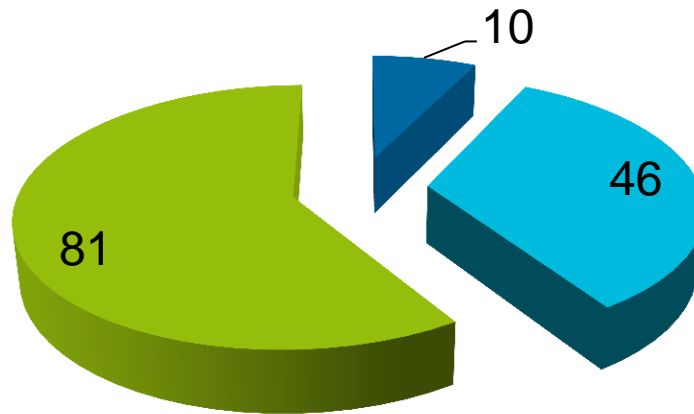
Questionnaire:

- 6 topics
- 2 sections:
 - Suggestions for rating proposed by team
 - Additional fields for further strongly supported responders' suggestions

Website: elv.whereabouts.oeko.info

2. Contributors (1)

- **Accessed 570 times**
- **134 + 3 effectively submitted responses**
- **Response classification (from submitters):**

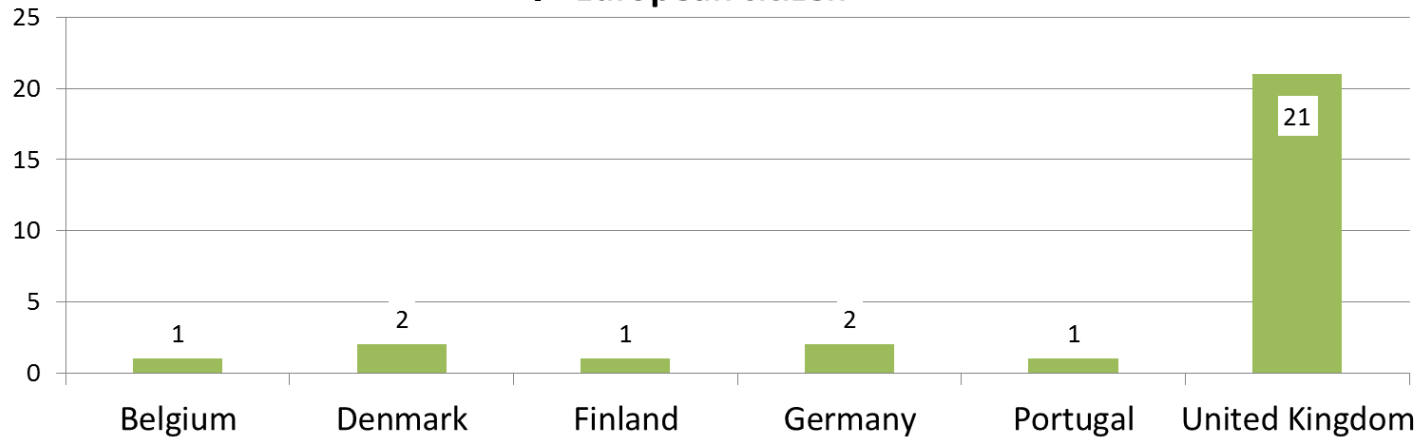


- cannot be published
- can be published anonymously
- can be published including personal information/ name of organisation

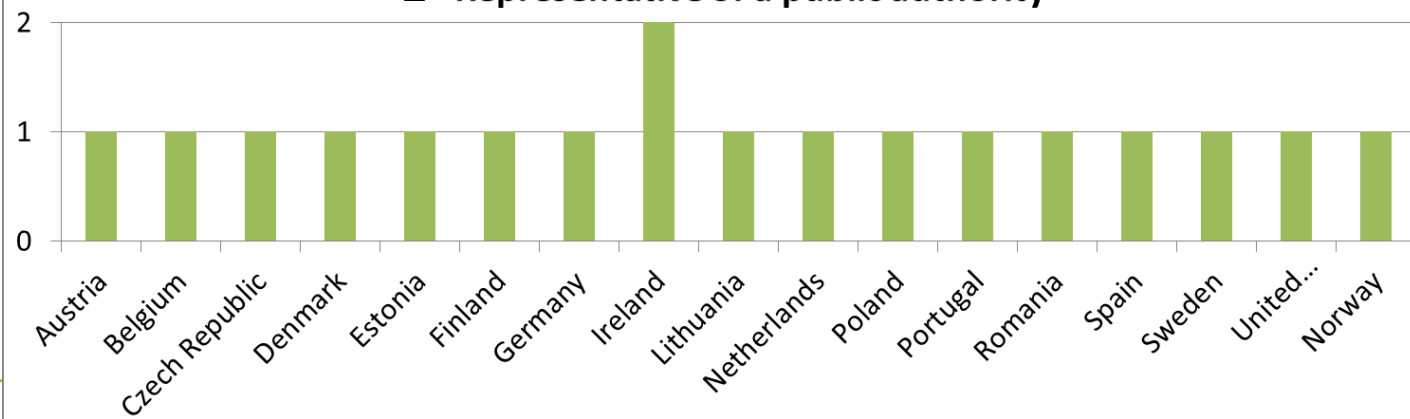
- **13 additional documents with other comments sent by email**

2. Contributors (2)

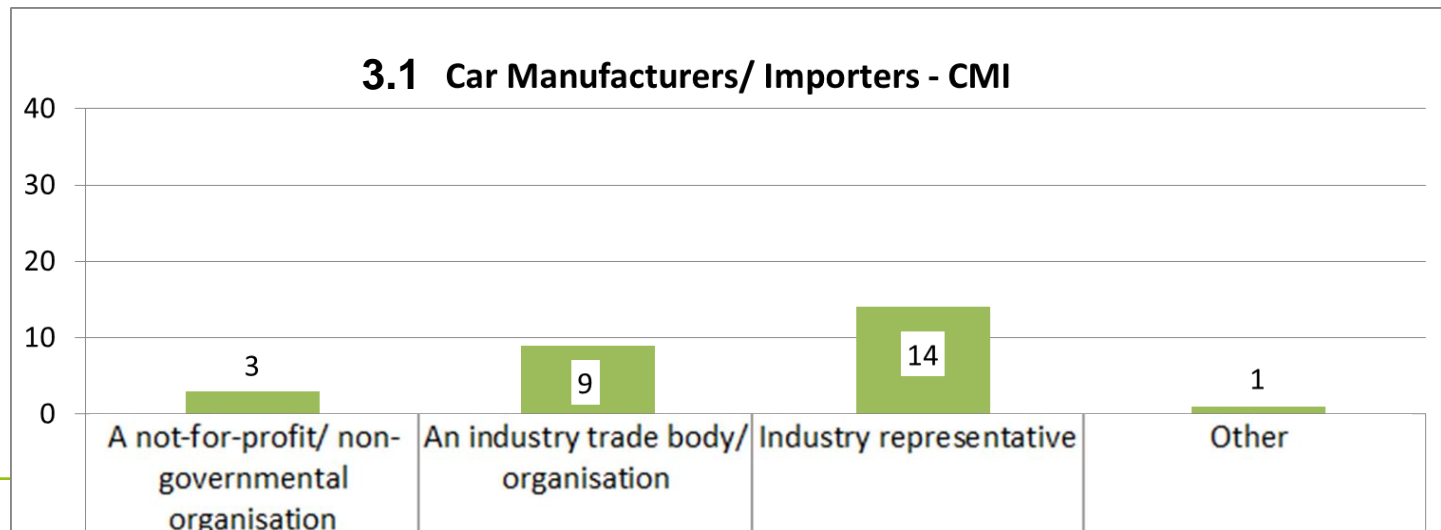
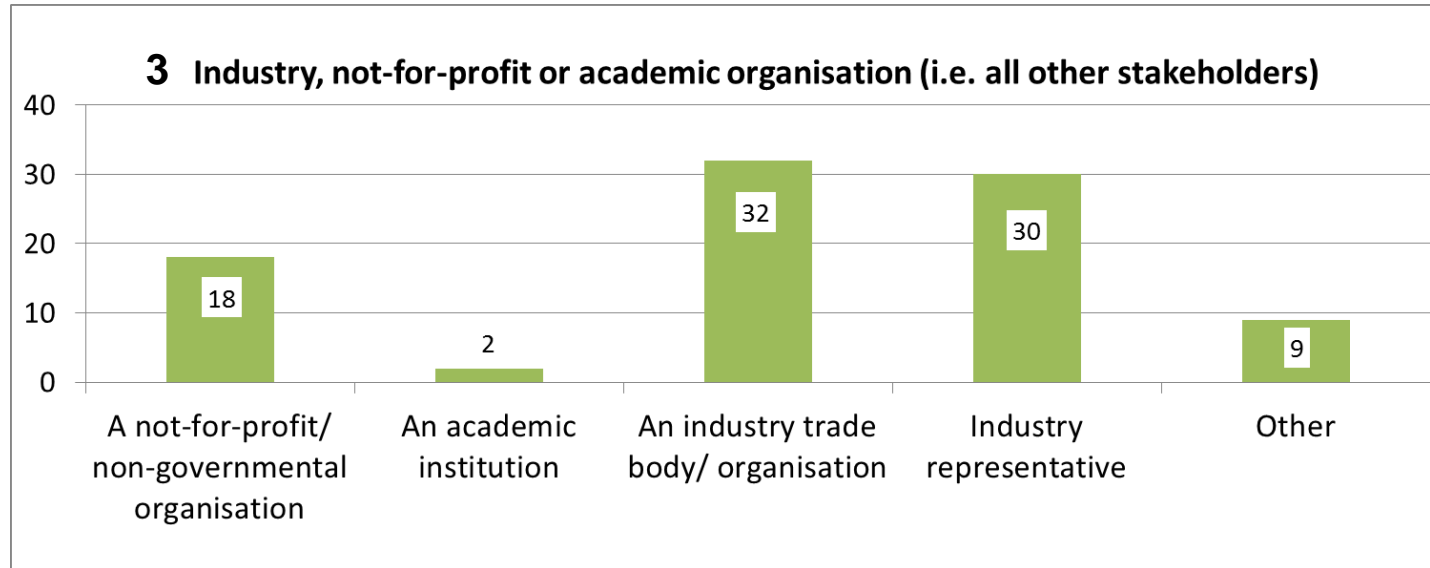
1 European citizen



2 Representative of a public authority



2. Contributors (3)



3. Evaluation of responses (2)

Topics:

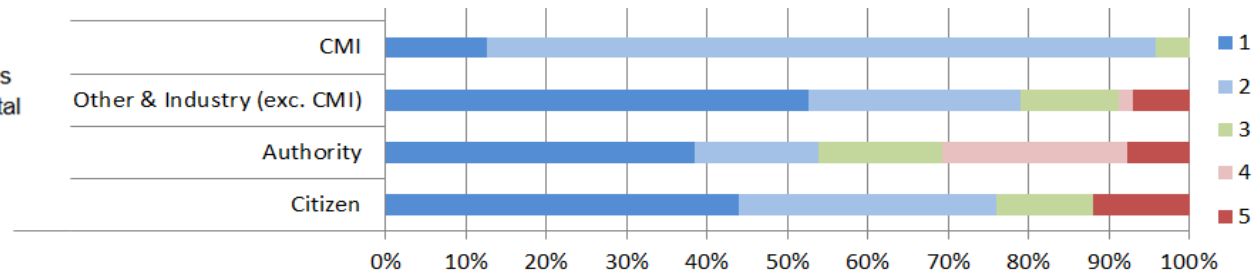
- 1. Intra-EU trade**
- 2. Extra-EU trade**
- 3. Enforcement**
- 4. Incentives**
- 5. Reporting template improvement**
- 6. POPs**

3. Evaluation of responses (1) – how to read figures

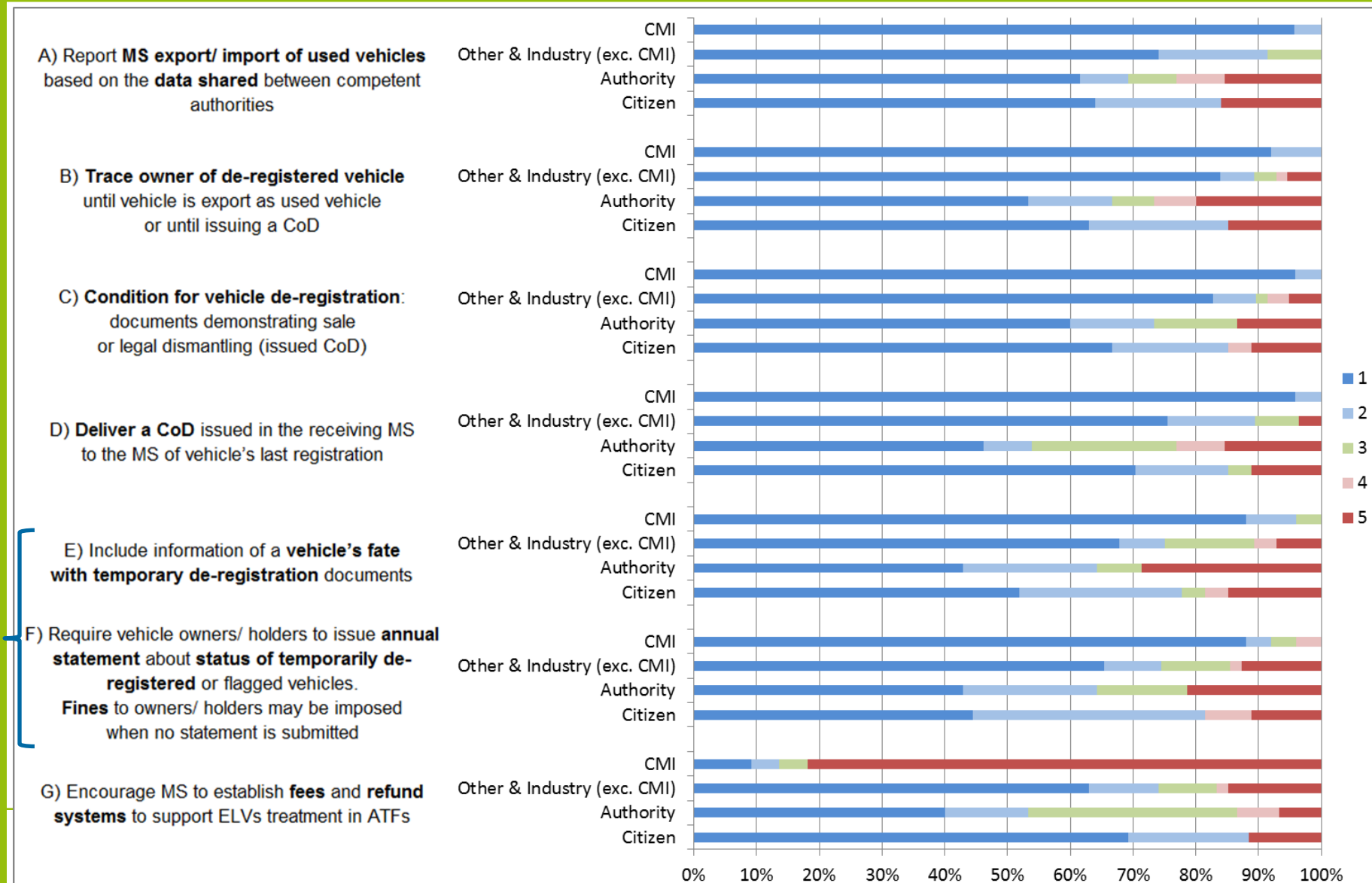
■ Numerical evaluation of responses: presentation of results

Example:

D) **Brand ATFs** as chains or certified locations to **raise public awareness** of ELV environmental issues and **promote ATFs**.



Topic 1. Keeping track of vehicles within the EU (intra-EU trade): numerical evaluation



Topic 1. Keeping track of vehicles within the EU (intra-EU trade): contributors' additional comments (1)

Selected additional suggestions:

- **Authorities:**

- 1) **Report of technical condition** attached to every sales agreement that allows defining whether the vehicle requires a minor repair according to the Correspondents' Guidelines No 9 (CG No 9)
- 2) **Revision of the CG No 9** in order to harmonise interpretation of terms such as 'repair at reasonable costs'
- 3) **EUCARIS** implementation in all MS; exchange information (e.g. CoD)
- 4) **Harmonization on the EU level** of the re-registration, de-registration etc. procedures incl. exchange information system between the MS

- **CMI:**

- 1) **2-Step-CoD**: first issuing to the last holder, second issuing to the authorities
- 2) From 2020 vehicles equipped with an **emergency call system**, which will be use to confirm a destruction of the vehicle

Topic 1. Keeping track of vehicles within the EU (intra-EU trade): contributors' additional comments (2)

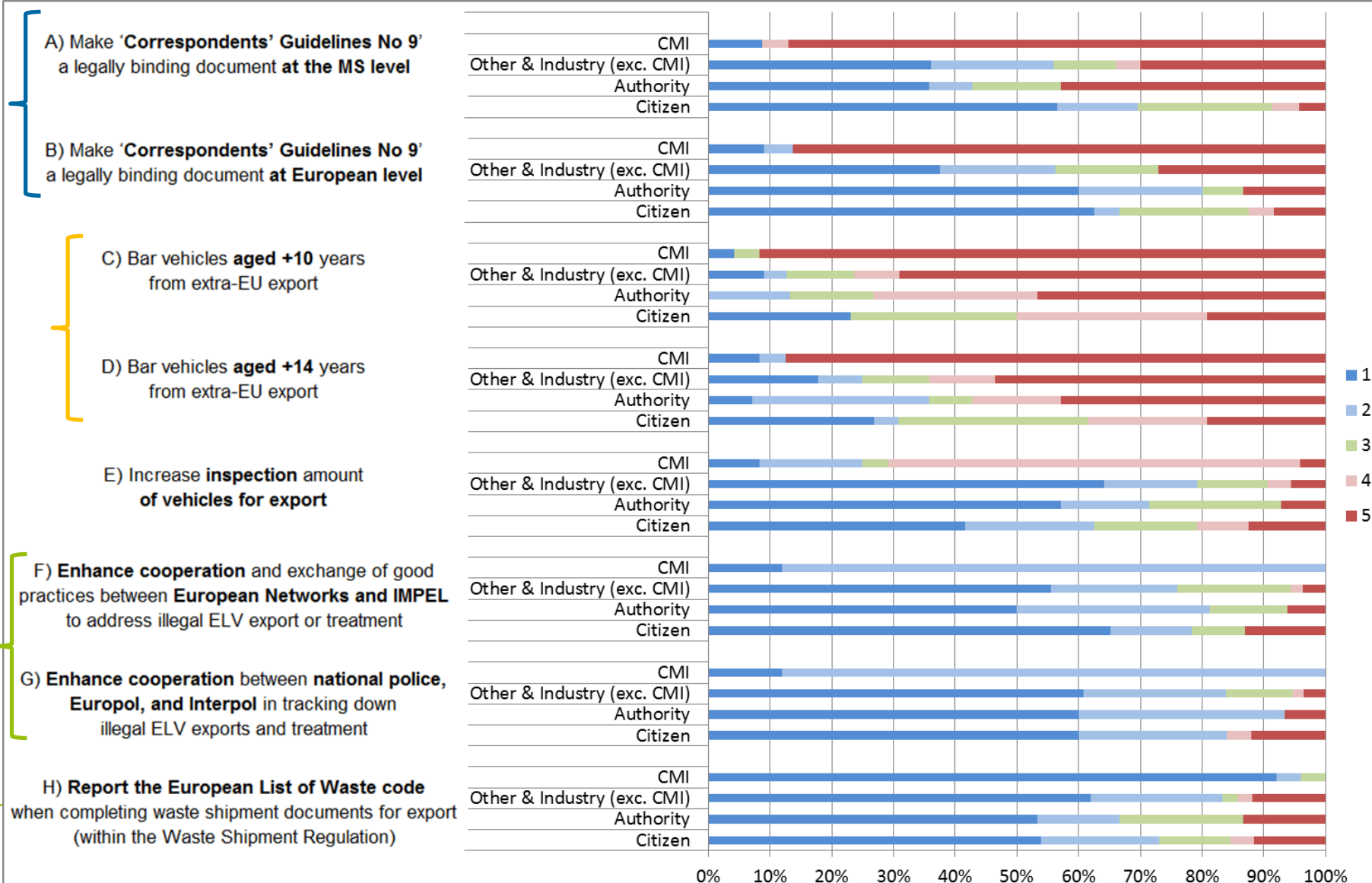
Selected additional suggestions:

- **Other:**
 - 1) Set out mandatory **collection rate** for the producers/ importers (as by WEEE)
 - 2) **Clarify the responsibility** of the importing MS for the vehicles that are imported but never re-registered
 - 3) Implement technical/ economic **vehicle control** before its export within and out of EU

Contribution from:

- “Authorities”: 20 different additional suggestions
- “CMI”: 10 different additional suggestions
- “Others”: 47 different additional suggestions

Topic 2. Methods to achieve more complete reporting on extra-EU export: numerical evaluation



Topic 2. Methods to achieve more complete reporting on extra-EU export: contributors' additional comments

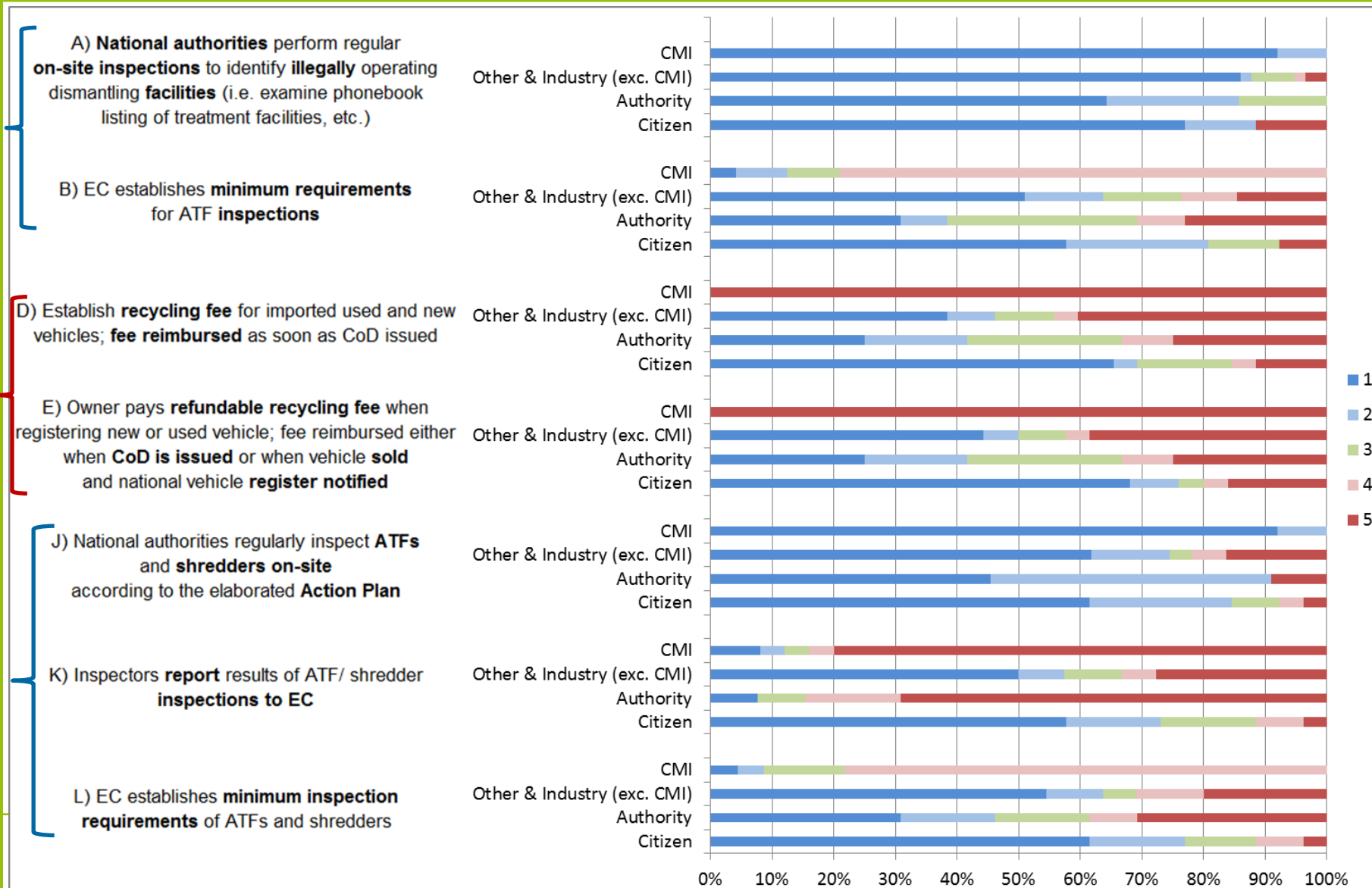
Selected additional suggestions:

- Valid **roadworthiness test** as a precondition for extra-EU export (for vehicles older than x years)
- **Correspondents Guidelines No 9**: define 'repair at reasonable cost'; simplify No 9; make it binding
- **Total loss declaration** by insurance company shall automatically classify a vehicle as ELV
- **Establish penalties** for false declaration of an ELV as used vehicle

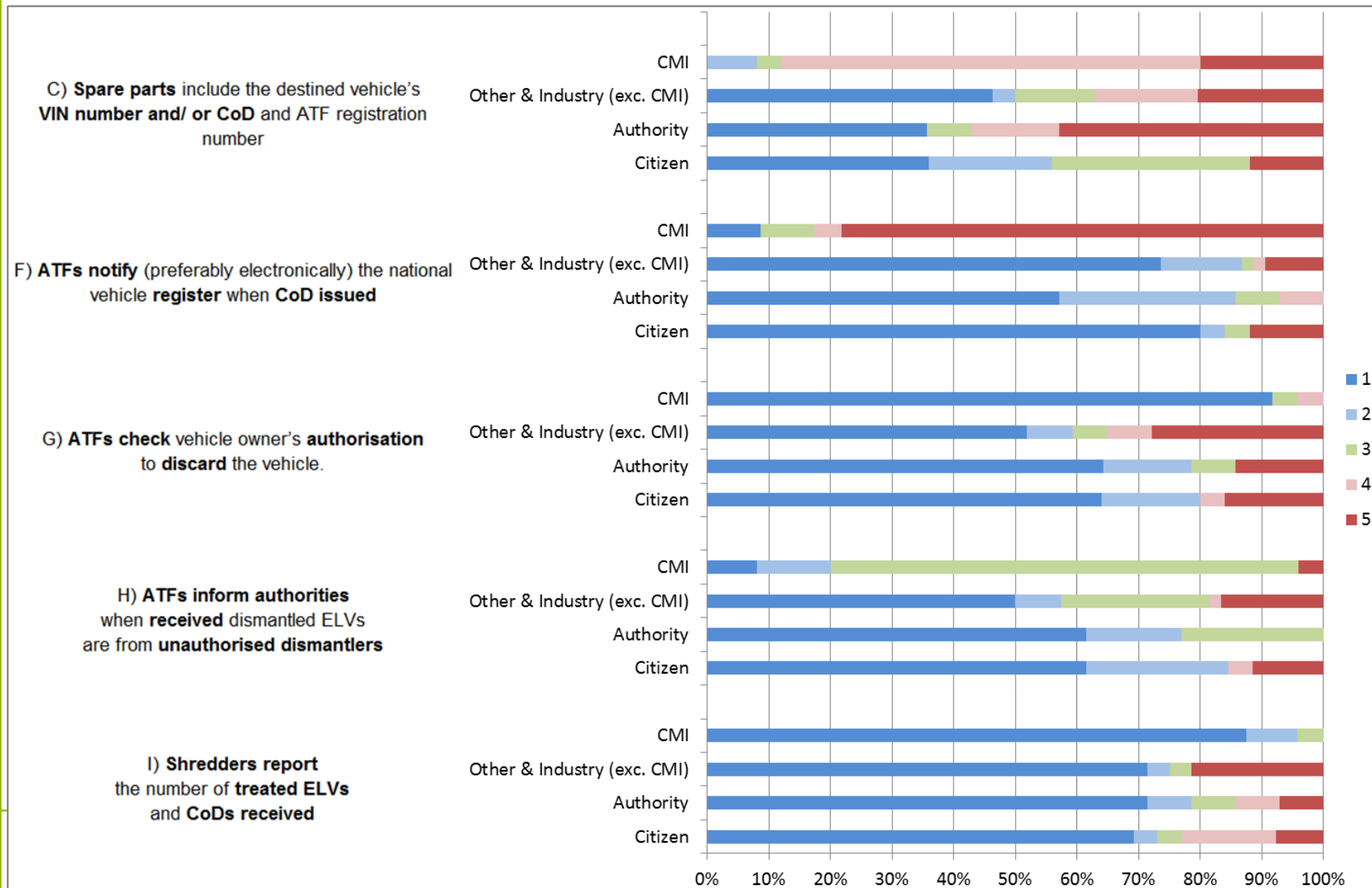
Contribution from:

- "Authorities": 16 different additional suggestions
- "CMI": 7 different additional suggestions
- "Others": 47 different additional suggestions

Topic 3. Enforcement techniques to reduce illegal dismantling of ELVs at dealers and repair shops (garages) and actions to improve ATF compliance: numerical evaluation (1)



Topic 3. Enforcement techniques to reduce illegal dismantling of ELVs at dealers and repair shops (garages) and actions to improve ATF compliance: numerical evaluation (2)



Topic 3. Enforcement techniques to reduce illegal dismantling of ELVs at dealers and repair shops (garages) and actions to improve ATF compliance: contributors' additional comments

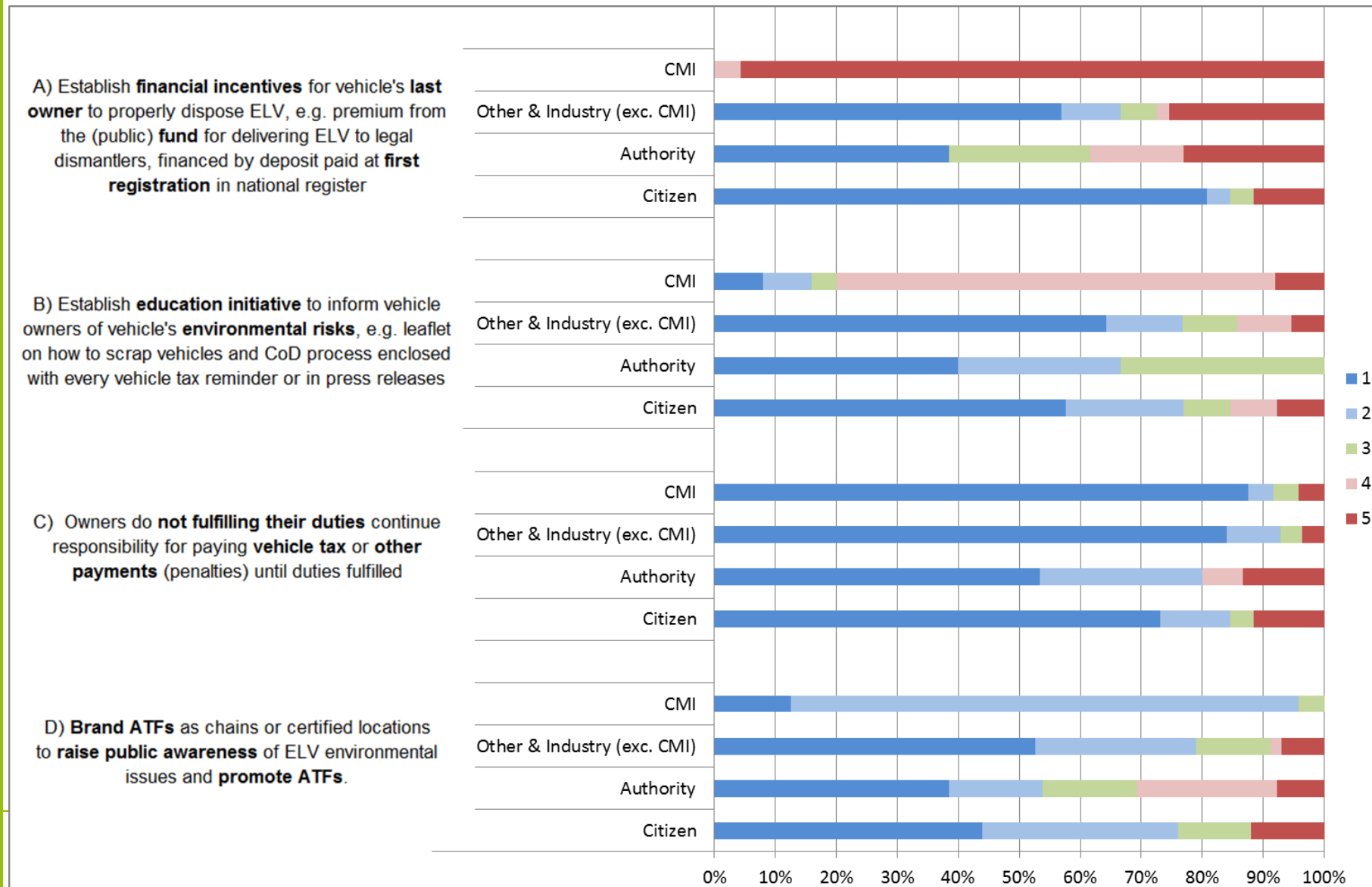
Selected additional suggestions:

- National authorities **control websites selling** used car parts
- **Use helicopters** to fly over critical areas to identify unauthorised sites
- **Punish the last owner** if they sell the vehicle to an illegal dismantling station
- EC establish **guidance for minimum frequency** of ATF inspections
- Use on the used spare parts of the **ATF's ELV reference number** that is registered in the company's police book
- **Enforce the law**; follow guidelines to check fulfilment of requirements regulated in Annex I of the ELV Directive

Contribution from:

- "Authorities": 17 different additional suggestions
- "CMI": 9 different additional suggestions
- "Others": 52 different additional suggestions

Topic 4. Public awareness and incentives for ELV tracking and environmental risks: numerical evaluation



Topic 4. Public awareness and incentives for ELV tracking and environmental risks: contributors' additional comments

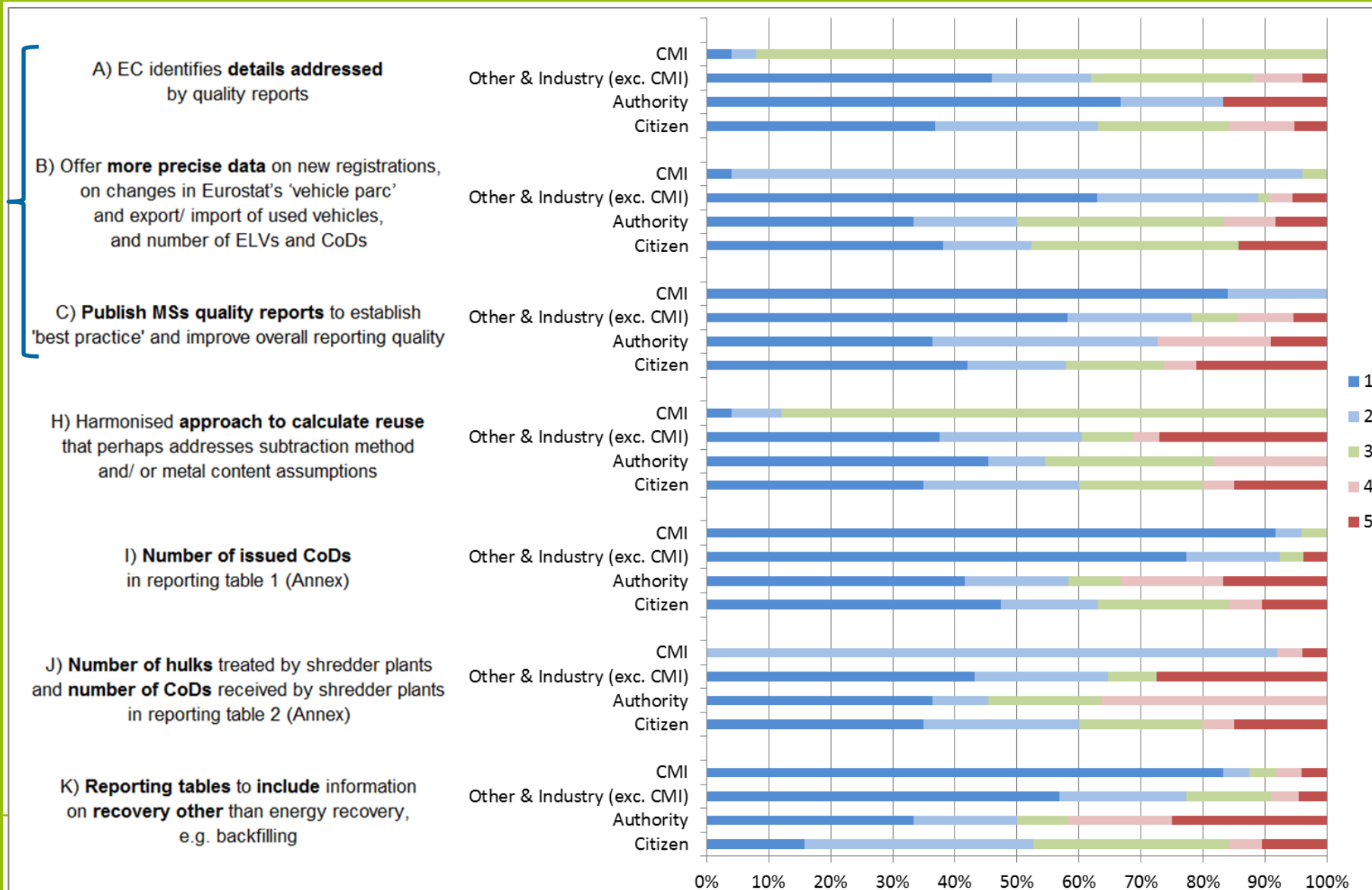
Selected additional suggestions:

- **Financial incentives:**
 - 1) incentives **for the producers** through a producer-financed fund
 - 2) incentives **for owners** from:
 - a) refundable tax (not fund),
 - b) price paid by ATFs for the reuse parts
- **Methods of incentives payment:** by the authority not the ATF
- Incentives **linked to the vehicle** not to the owner
- **Public awareness campaigns** organized by EC

Contribution from:

- “Authorities”: 13 different additional suggestions
- “CMI”: 3 different additional suggestions
- “Others”: 29 different additional suggestions

Topic 5. Aspects to improve coverage and data quality when reporting on ELVs (possible revision of the Commission Decision on ELV annual reporting): numerical evaluation (1)



Topic 5. Aspects to improve coverage and data quality when reporting on ELVs (possible revision of the Commission Decision on ELV annual reporting): numerical evaluation (2)



Topic 5. Aspects to improve coverage and data quality when reporting on ELVs (possible revision of the Commission Decision on ELV annual reporting): contributors' additional comments

Selected additional suggestions:

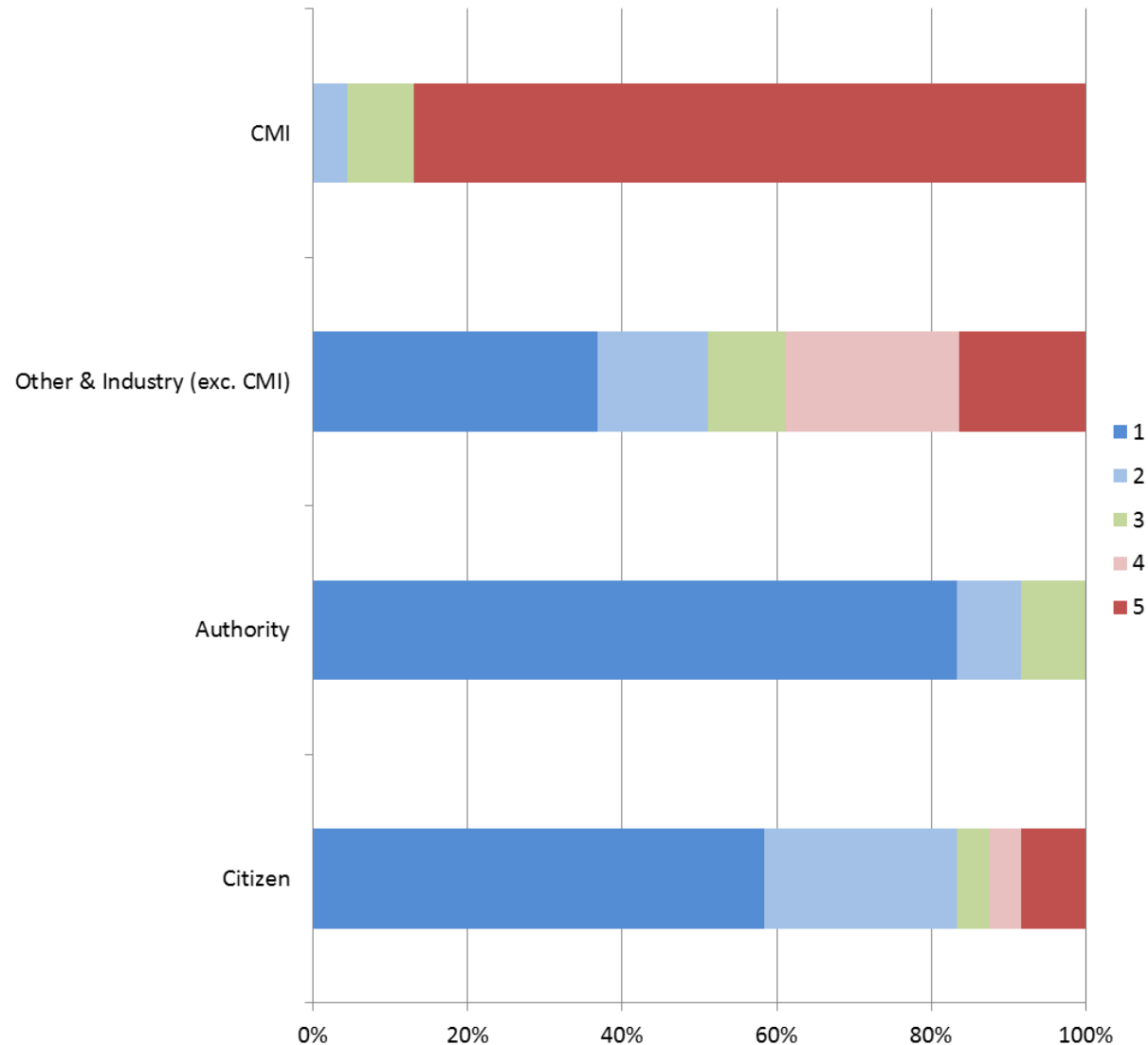
- Recommended **improvements** for:
 - 1) reporting exported and imported material streams, for example the number of depolluted ELVs (hulks)
 - 2) use of EUCARIS
- **Amend the European List of Waste code**, introducing a specific code for ELVs as covered in the scope of the ELV Directive (i.e. to exclude ships/vessels, trains and aeroplanes)
- **Harmonize** recycling and recovery **definitions** within WFD

Contribution from:

- “Authorities”: 7 different additional suggestions
- “CMI”: 4 different additional suggestions
- “Others”: 22 different additional suggestions

Topic 6. Persistent Organic Pollutants (POPs) and ELVs: numerical evaluation

A) To support ELV pre-treatment and dismantling, IDIS (International Dismantling Information System) includes information on potential pollutants to ELV recycling process, such as persistent organic pollutants (POP) or other substances not yet mentioned in ELV Directive



Topic 6. Persistent Organic Pollutants (POPs) and ELVs: contributors' additional comments

Selected additional suggestions:

- **Authority:**
 - 1) **Update requirements** on treatment operations in the ELV Directive
 - 2) **Revise IDIS** in order to suit current needs of dismantlers
 - 3) Consider hazardous substances and POP's in ELVs when defining **recycling targets for ELVs**
- **Others:** “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**”

Contribution from:

- “Authorities”: 7 different additional suggestions
- “CMI”: 2 different additional suggestions
- “Others”: 22 different additional suggestions

General remark

We **thank you all responders** for their valuable input into this public consultation!

We received **valuable suggestions** from diverse stakeholders that offer:

- New ideas (or specific critical aspects) and
- Details for particular challenges and solutions in MS or on EU level

These **suggestions** can:

- Serve as starting point to assess options in detail (impact assessment, if necessary) on EU level and
- Be used in national discussions on how to support enforcement of the ELV Directive

Thank you for your attention!

See the details from the consultation
→ elv.whereabouts.oeko.info

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