

EUROFER COMMENTS TO ELV DIRECTIVE

The European Directive on End Of Life Vehicles (ELV) has proven during the years to be a valid instrument for setting up a proper management system aimed at managing vehicles and their parts at their end of life. However, technical and social developments imposed its updated for making it more fit for the next challenges.

Nowadays, the priority is to have a functional management and treatment of the end of life vehicles and, in particular, of their parts and constituent materials. The priority is to go circular and thus EUROFER welcomes the opportunity of contributing to the evaluation of the directive and giving his views for improving it. The present paper wants to present some general issues and/or comments linked to the actual use of and to aspects not sufficiently covered by the directive. Moreover, the paper wants to highlights issues identified by the sector and how these could be solved in future.

1. **‘Whereabouts’** – the consistency and correctness of the database built using information about registered, de-registered, exported and destroyed vehicles is an essential element. These data are fundamentals for evaluating the future possible availability of secondary raw materials from vehicles and the European stock. However, as already highlighted by the “Assessment report on the implementation of the ELV Directive”¹ discrepancies exist among different national registers and their reported data, making unknown whereabouts of vehicles for EU-28 on average between 2008 and 2014 equal to 3,700,000 vehicles. Moreover, in 2014 unknown whereabouts touched the record of 4,600,000 vehicles.

Essential pre-conditions for narrowing down these discrepancies and closing the gaps are:

- to bestow end-of-life vehicles only to Authorised Treatment Facilities (ATFs);
- to have an obligatory issuing of the Certificate Of Destruction (CoD) by all ATFs;
- to report also about parts and materials recovered from ELVs and then exported to third countries for their valorisation and recycling. This will help in closing the materials loop within automotive applications.

2. **‘Technical requirements for the treatment/depollution of the vehicles’** – the sequence of the treatment operations for the depollution of a vehicle is a fundamental step toward a full and high quality recycling of materials and parts of a vehicle. The actual requirements contained in the annex I of the directive, and making reference to the “treatment operations in order to promote recycling”, are not detailed enough for promoting real recycling and circular economy.

For instance, ferrous scrap coming from a shredded end of life vehicle is often an abundant source of copper that limits recyclability of steel and it cannot be recovered and recycled by the copper industry. Thus, it is evident that what is identified as ‘depollution step’ does not deal only with hazards.

It is also an essential step for promoting ‘material conservation’ and limiting ‘poor quality’ material recovery operations and/or down-cycling. Material losses in the economic loop and down-grading material properties during or after ELV treatment will bring to additional environmental impacts, such as additional energy in recycling or additional requirement of virgin material for restoring lost quality in the material loop. Hence, for instance, the removal of the most part of copper from ferrous scrap is an equally important step.

¹ 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 Under the Framework Contract: Assistance to the Commission on technical, socioeconomic and cost benefit assessments related to the implementation and further development of EU waste legislation, prepared by by Oeko-Institut e.V.

- Therefore, the removal of all vehicle parts – such as copper wire, circuits, glass, tyres and so on - should be prescribed to be made before the shredding, supporting thus both environmental and economic benefits;
 - moreover, the MSs and the EU Commission should aim to have a ELV treatment sector well regulated, i.e. having all the treatment installations as authorised ones. Thus, all vehicles will be treated according to the ELVD requirements (actual and future improved ones).
 - finally, a correctly regulated sector with the shredding installations authorised as ATF might support resource efficiency and circular economy. Different material streams separated before the shredding might be properly tracked via reporting obligations of the ATF and CoD issues.
3. **‘Digitalisation’** – the procedures of data collection, data reporting and issuing of the certificates have to be digitalised to the maximum extent possible. In this way, the bureaucratic burden for the operators and the member states and the involvement of the last owners of the end-of-life vehicles will be minimised.
 4. **‘Recycling and recovery target’** – the directive has been created in 2000 for responding to the needs of a proper end-of-life vehicles management or as a waste management instrument. The set-up of targets for the entire vehicle has been a very effective instrument for the promotion of the recovery and recycling as waste management options.

However, what has been witnessed during the application of the directive is that many parts, collected during the de-pollution phase, such as tyres, batteries or glass, are reported as 100% recycled, notwithstanding that they had still to be recycled. Within a circular economy this approach should be changed.

- The calculation of the recycling targets has to be based on the weight of the entire vehicle (target imposed by the Directive).
- The efficiency of the entire treatment and processing of the vehicle, for sake of compliance with the ELV overall target, has to include the efficiency of the recycling and recovery process of batteries or tyres.

For instance, if the ELV would assume the battery s 100% recycled when separated from the vehicle and the recycling efficiency (under the Batteries Directive) does not reach 100%, there will be an inconsistency and then data gaps. This problem has to be rectified otherwise the data gap will become progressively larger and will give a distorted assessment of the real situation (like for instance when during the revision of the Waste Framework Directive it emerged that recycling rates reported by MSs were in reality collection rates).

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