Open Public Consultation on the ELV Evaluation

ELV Evaluation - Open Public Consultation

Introduction

Background context of the consultation

**What is the Directive 2000/53/EC on end-of-life vehicles about?**

Every year, millions of vehicles in Europe reach the end of their life. If end-of-life vehicles (ELV) are not managed properly, they can be a threat to the environment as well as a lost source of millions of tonnes of materials. The **Directive 2000/53/EC** on end-of-life vehicles (ELV Directive) was adopted in 2000 to minimise the impact of end-of-life vehicles (ELVs) on the environment and to improve the environmental performance of all the economic operators involved in the life cycle of vehicles.

**Why is the Commission performing a consultation?**

Directive 2018/849/EU obliges the Commission to evaluate it by the end of 2020. Special attention is to be given to its implementation, to the feasibility of setting targets for reporting per specific materials, and to the problem of the end-of-life vehicles of unknown whereabouts.

**How will the replies to this consultation be used?**

Your replies to this consultation will be used as part of the evaluation.

About you

- Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - Gaelic
  - German
  - Greek
  - Hungarian
  - Italian
  - Latvian
  - Lithuanian
  - Maltese
• I am giving my contribution as
  ○ Academic/research institution
  ○ Business association
  ○ Company/business organisation
  ○ Consumer organisation
  ○ EU citizen
  ○ Environmental organisation
  ○ Non-EU citizen
  ○ Non-governmental organisation (NGO)
  ○ Public authority
  ○ Trade union
  ○ Other

• First name
  Kamila

• Surname
  SLUPEK

• Email (this won’t be published)
  slupek@eurometaux.be

• If you represent the private sector, please specify your area of interest / activity (you can select more than one box):
  ○ Vehicle producer / manufacturer / importer
  ○ Vehicle dealer
  ○ Vehicle repair workshop
  ○ Insurance company
  ○ Dismantling sector, Authorised Treatment Facility
  ○ Shredder Operator
  ○ Energy recovery sector
  ○ Recycling sector
  ○ Other (for example, exporter / importer of used vehicles)

• If you represent an economic operator, please specify your approximate annual turnover:
● Organisation name

*255 character(s) maximum*

Eurometaux – European Association of Metals

● Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

● Transparency register number

*255 character(s) maximum*

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

61650796093-48

● Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Fiji
- Faroe Islands
- France
- French Guiana
- French Polynesia
- Gabon
- Gambia
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Midway Islands
- Moldova
- Monaco
- Mongolia
- Montenegro
- Morocco
- Mozambique
- Myanmar
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norway
- Oman
- Pakistan
- Palau
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Romania
- Russia
- Rwanda
- Saint Barthelemy
- Saint Helena
- Saint Kitts and Nevis
- Saint Lucia
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- Spain
- Sri Lanka
- Sudan
- Suriname
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailan
- The Gambia
- The Maldives
- The Netherlands Antilles
- The United Arab Emirates
- The Bahamas
- The Comoros
- The Gambia
- The Grenadines
- The Netherlands Antilles
- The Seychelles
- Timor-Leste
- Togo
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Tuvalu
- Ukraine
- United Arab Emirates
- United Kingdom
- United Kingdom
- United States of America
- United States Minor Outlying Islands
- United States Virgin Islands
- Uruguay
- Uzbekistan
- Vanuatu
- Vatican City State
-  
Publication privacy settings
The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**
  Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

- **Public**
  Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

- I agree with the [personal data protection provisions](#)
In the following, you will find some questions regarding the extent of your familiarity with the subject of this consultation.

**To what extent are you familiar with:**

<table>
<thead>
<tr>
<th></th>
<th>Fully familiar</th>
<th>To a large extent</th>
<th>To some extent</th>
<th>Not at all</th>
<th>I do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>* The ELV Directive?</td>
<td>○</td>
<td>○</td>
<td></td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>* The transposition of the ELV Directive</td>
<td>○</td>
<td>○</td>
<td></td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

**How often do you deal with:**

<table>
<thead>
<tr>
<th></th>
<th>Daily</th>
<th>Monthly</th>
<th>Yearly</th>
<th>Not at all</th>
<th>I do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>* The ELV Directive?</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
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</tr>
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<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

In the following table you will find some statements regarding the deregistration of vehicles. To what extent do you agree with them?

**In your country of residence, if you had to scrap your car:**

<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>* 1. You would not incur any costs</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>* 2. You would receive some payment that</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>* 3. There would be adequate availability</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>* 4. The deregistration system established</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>
5. The deregistration system obliges vehicle owners to indicate one of the following three options: export, off road storage or scrapping

6. Certificates of destruction are always provided to the last registered owner of a vehicle which reaches the end of its life and is scrapped

7. There are financial incentives (i.e. payments) that encourage vehicle owners / keepers to use authorised treatment facilities to dispose of their end of life vehicles.

8. Did you ever experience to deregister your car in country A and register the same car in country B but never received a deregistration proof from country A?

In the following there are questions regarding vehicle repair:

In your country of residence, if you repair your vehicle independently (Do It Yourself)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes - for free</th>
<th>Yes - for a fee</th>
<th>No</th>
<th>I do not know/ no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Are there facilities that accept defective parts removed from your vehicle?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Are there facilities that accept used liquids removed from your vehicle?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

An increasing number of spare parts are sold via the internet. Please indicate if spare parts purchased via the internet in your country are accompanied with the following information:

- The name of the dismantler who dismantled the spare part from an ELV
- The registration number of the dismantler, indicating that the dismantler is an authorised treatment facility and registered in the national registry.
- The vehicle Identification number (VIN) of the vehicle from which the spare part was removed.
- Spare parts sold are not accompanied with any of the information mentioned above
- I do not know
Are you aware of any problems related to the disposal and treatment of ELVs in your country or region?

- Yes
- No
- I do not know

Are there any issues relating to the management of end-of-life vehicles that are not adequately covered by the ELV Directive?

Special attention should be given to the problem of the illegal exports of end-of-life vehicles (ELVs). It is estimated that 3-4 million ELVs are deregistered every year without a certificate of destruction. They are mainly illegally exported to non-EU countries, where they may be used and/or dismantled and recycled mostly under sub-standard conditions. In some of those countries the legal obligations to appropriately recycle may not even exist.

The above circumstances adversely influence environment & health conditions in the destination countries, but they also bring a great loss of metals stock in the EU jeopardizing our efforts towards true circular economy.


Recital 7 of Directive 2018/849 already makes it clear that during ELV Directive review attention should be paid to the problem of ELVs that are not accounted for, including the shipment of used vehicles suspected to be ELV, & to the application of the Correspondents’ Guidelines No 9 on shipments of ELVs. In our view these Guidelines, already adopted by the MSs, should be legally binding and added as an Annex to the ELV Directive.

Last but not least, conditions for waste shipments within and to the EU should be amended so that spent car batteries are imported more easily for treatment in the EU installations that fulfil EHS standards.

Other comments:

If you wish to add further information, comments or suggestions, including examples of good or bad practice) – within the scope of this questionnaire – please feel free to do so here:

We would like to underline that over 90% of metals in end-of-life vehicles are recovered in Europe when using the high-quality facilities. For lead-acid batteries this is over 99%, making them the most recycled consumer product. (Source: “Metals for a climate neutral Europe: A 2050 Blueprint” - https://eurometaux.eu/media/2005/full-report-8-56-17.pdf)

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