

Open Public Consultation on the ELV Evaluation

Fields marked with * are mandatory.

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. [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

- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* 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:

- <€100.000
- €100.000-1.000.000
- €1.000.000-10.000.000
- €10.000.000-50.000.000
- € >50.000.000

* 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.

- | | | | |
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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |

- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- North Korea
- North Macedonia
- Northern Mariana Islands
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda

- | | | | |
|--|-----------------------------------|---|--|
| <input type="radio"/> Chile | <input type="radio"/> Isle of Man | <input type="radio"/> Panama | <input type="radio"/> Ukraine |
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* 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](#)

The questionnaire

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:

	Fully familiar	To a large extent	To some extent	Not at all	I do not know
* The ELV Directive?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The transposition of the ELV Directive in your country?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

How often do you deal with:

	Daily	Monthly	Yearly	Not at all	I do not know
* The ELV Directive?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The transposition of the ELV Directive in your country?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
* 1. You would not incur any costs	<input type="radio"/>	<input checked="" type="radio"/>				
* 2. You would receive some payment that reflects the value of any components or material that can be recovered from the vehicle	<input type="radio"/>	<input checked="" type="radio"/>				
* 3. There would be adequate availability of collection facilities within your region	<input type="radio"/>	<input checked="" type="radio"/>				
* 4. The deregistration system established by your country is simple (i.e. not overly burdensome)	<input type="radio"/>	<input checked="" type="radio"/>				

* 5. The deregistration system obliges vehicle owners to indicate one of the following three options: export, off road storage or scrapping	<input type="radio"/>	<input checked="" type="radio"/>				
* 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	<input type="radio"/>	<input checked="" type="radio"/>				
* 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.	<input type="radio"/>	<input checked="" type="radio"/>				
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?	<input type="radio"/>	<input checked="" type="radio"/>				

In the following there are questions regarding vehicle repair:

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

	Yes - for free	Yes- for a fee	No	I do not know/ no opinion
* 1. Are there facilities that accept defective parts removed from your vehicle?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* 2. Are there facilities that accept used liquids removed from your vehicle?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

*** 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?

1500 character(s) maximum

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.

Eurometaux calls for a greater coherence between the ELV Directive & the waste legislation, i.e. Waste Framework Directive, Waste Shipment Regulation and Batteries Directive.

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:

1500 character(s) maximum

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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Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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