

## EuRIC reaction on the Roadmap: “Legislation on end-of-life vehicles - evaluation”

**The European Recycling Industries' Confederation (EuRIC) strongly welcomes the publication of the Roadmap to evaluate the Directive 2000/53/EC on end-of-life vehicles (ELV Directive). As a reaction to this roadmap, representing one step ultimately leading to a review of the ELV Directive, EuRIC calls on the European Commission to seize this opportunity for (i) solving the issue with a large number of vehicles of unknown whereabouts in Europe and (ii) making dismantling and recycling of ELV easier by introducing binding eco-design measures.**

➤ ***4 million vehicles of unknown whereabouts per year in Europe***

The ELV Directive should be used as a tool to solve the issue of missing ELVs in Europe. It is known from the European Commission's studies that the number of vehicles of unknown whereabouts is about 4 million vehicles per year, compared to around 6 to 7 million ELVs treated in compliance with the ELV Directive.

The reasons for missing vehicles might be numerous, such as illegal exports, statistical errors, misuse of the temporary deregistration of vehicles etc. The revision of the ELV Directive is the right opportunity to:

- **Introduce well-framed incentives** for the last holder to deliver a vehicle to authorised treatment facilities and hence, **strengthen the certificates of destruction (CoD)**;
- Determine a clear & “easy to implement” **distinction between used cars and ELVs**, such as those recently introduced by Italy and based on passing a roadworthiness test;
- **Improve the exchange of information** regarding the fate of temporary de-registered vehicles as well as regarding CoD issued in a different Member State;
- Oblige the last owner e.g. to annually pay an administrative fee for his deregistered car until he can provide a CoD.

Untreated ELVs are hazardous waste, which pose significant risk for the environment. The EU legislation sets out stringent rules for the operators of ELV treatment facilities to ensure compliance at the highest level of environmental protection. Recycling companies made considerable investments to comply with these rules, but the ELVs escape from the system.

Setting out a total recovery rate of 95% (apart from the strict environmental rules) is just the first step. To complete the work, recycling industry urges the European Commission to adopt a legislation ensuring that ELVs find their way into authorised treatment facilities.

➤ ***Polluter pays principle is a pre-requisite for better recycling***

The long lifetime of products in the vehicle market means that there is a long delay between the time when a vehicle was produced and the time, when the vehicle will reach its end-of-life. This can make ELVs recycling extremely costly. Hence, polluter pays principle must apply.

Due to the long lifetime, the ‘disconnect’ between design & composition of today's manufactured vehicles and the development of chemicals legislation regulating various substances at the end of their life is substantial. The ever-changing thresholds for an increasing amount of substances under REACH and POPs legislation form a considerable burden for the recycling industry and can endanger the achievement of the total recovery rate of 95%. Whilst the recycling industry is capable of



reducing the legacy of substances to the greatest possible extent, it will not be able to eliminate all substances of concern completely. This must be recognized and supported, where necessary, also by introduction of reasonable exemptions for recycling. In addition, binding eco-design measures will ensure that the design stage starts in a proper way, instead of correcting mistakes at the end-of-life stage.

Last but not least, post-consumer recycled content would considerably foster the demand for recycled plastics from ELVs in order to convert the linear supply chain to a circular material flow model.

*EuRIC – The European Recycling Industries' Confederation – is the umbrella organisation for recycling industries. Through its Member Federations from 20 EU & EFTA countries, EuRIC represents across Europe over:*

- *5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies & SMEs, involved in the recycling of various resource streams;*
- *300,000 local jobs which cannot be outsourced;*
- *Million tons of waste recycled per year (metals, paper, plastics, glass and beyond).*

*Recyclers play a key role in a circular economy. By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again.*