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Roadmap on the revision of the End-of-Life Vehicles Directive – Eurometaux’s input to the consultation

Introduction

The non-ferrous metals industry is one of key suppliers for the automotive sector. Metals are present in the car body (e.g. aluminium), car battery (e.g. lead, lithium, nickel, cobalt, copper), catalytic converter (e.g. platinum, palladium) or motor (e.g. copper) to name just a few applications.

The growing trend towards clean mobility, which is one of the elements of the EU Green Deal, will require even higher amounts of metals from primary but more desirably secondary sources. Many of those metals are recycled in high yields from the cars collected in Europe. However, the biggest gap to meet the EU Circular Economy objectives is that one third of all vehicles remains undocumented at the end-of-life.

This paper responds to the Roadmap on the End-of-Life Vehicles (ELV) Directive revision and addresses key issues from the perspective of the non-ferrous metals industry.

Our key recommendations

- **Illegal export** – Tackle the problem of ELVs deregistered without a certificate of destruction and enforce controls at the borders to prevent their illicit export to non-EU countries.
- **Recycling aspects** – Improve the flow of ELVs and their parts to European recyclers, through improvements to collection, dismantling and sorting and streamline waste shipments rules. Maximise vehicles dismantling before their shredding.
- **Coherence of EU legislation** – Ensure coherence between the ELV Directive and EU waste legislation, e.g. Waste Framework Directive, Batteries Directive and Waste Shipment Regulation.

Illegal export of End-of-Life Vehicles

It is estimated that 3-4 million end-of-life vehicles 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. These circumstances adversely influence environment and health conditions in the destination countries, but they also bring a great loss of metals stock in the EU, jeopardizing our efforts towards a true circular economy.



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Our recommendations

- Prevent illegal shipments of ELVs to developing countries, that lack the capacity for safe processing of materials, by strengthening controls at the Member States and EU-external borders.
- Address the ELVs that are not accounted for, including the shipment of used vehicles suspected to be ELV, through better statistics and reporting by Member States.

Recycling aspects

In Europe, over 90% of metals in end-of-life vehicles are recovered when using the appropriate facilities. To maximise the recovery of metals contained in the used cars it is necessary to optimise collection by addressing all undocumented ELVs. In addition, end-of-life operations like dismantling and sorting should be improved and in particular vehicles dismantling operations should be maximised before the shredding. Post-shredder treatments are part of the solution but having dismantling done upfront is especially advantageous for parts that can easily be recycled into similar applications again (e.g. hoods, doors). The easiness and economic feasibility of such a solution depends on car parts location but also whether the product was designed for easy dismantling.

High-quality European recyclers have enough capacity to recycle Europe's ELVs and their respective parts. A good example are lead-acid car batteries that are recycled at the level of 99%, making them Europe's most recycled consumer product. However, specialised installations are not present in each Member State requiring transport of waste across the borders. Practice shows that waste shipments procedures can take few months for a planned intra-EU shipment to receive approval from all concerned authorities, and over a year if waste comes from outside Europe.

In addition, we would also like to highlight that introducing a minimum recycled content in ELVs for materials like aluminium is not appropriate as already 95% of aluminium from end-of-life vehicles is effectively recycled and can be used in new products. Primary and secondary metals have an identical quality so imposing minimum recycled content figures for aluminium or other well-recycled metals in cars will simply prevent from using them in other applications and may introduce longer scrap transportation distances. The main aim must be to improve recycling efficiency of metals-containing products so the material is reintroduced to the market to meet the circular economy objectives.

Our recommendations

- Make sure that the upcoming ELV Directive review focuses on the end-of-life stage and promotes reuse, recovery and recycling of materials, maintaining the Directive's goal to limit the generation of waste.
- Encourage Member States to advance and improve collection, dismantling and sorting infrastructure for ELVs.
- Shift from full shredding of cars to a recycling practice that dismantles and treats more components separately.
- Make sure that batteries removed from ELVs are subjected to the Batteries Directive.
- Lower administrative burden for intra-EU waste shipments and imports allowing that spent car batteries are imported more easily for treatment in the EU installations that fulfil EHS standards.



- Avoid introducing minimum recycled content for aluminium or other well-recycled metals in cars. Instead, use recycled content as a stimulus for those materials where secondary materials markets are not functioning yet.

Coherence of EU legislation

Eurometaux calls for a greater coherence between the ELV Directive and waste legislation, e.g. Waste Framework Directive, Waste Shipment Regulation and Batteries Directive. This would minimise leakages and contribute to better enforcement of existing collection and recovery/recycling obligations meeting the objectives of the EU Circular Economy. Batteries, for example, once removed from the end-of-life vehicles, are a separate waste stream and they are already covered by the Batteries Directive. They should therefore be excluded from the scope of the ELV Directive when revising this piece of legislation.

Moreover, Recital 7 of Directive 2018/849¹ already makes it clear that during the 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 ELVs, and to the application of the Correspondents' Guidelines No 9 on shipments of ELVs. In our view, these Guidelines, already adopted by the Member States, should be legally binding and added as an Annex to the ELV Directive.

Our recommendations

- Ensure coherence between the ELV Directive and Waste Framework Directive, Batteries Directive as well as Waste Shipment Regulation to make it consistent with the objectives of the EU Circular Economy.
- Exclude batteries from the scope of the ELV Directive.
- Make the Correspondents' Guidelines No 9 on shipments of ELVs legally binding and add those as an Annex to the ELV Directive.

ABOUT EUROMETAUX

Eurometaux is the decisive voice of non-ferrous metals producers and recyclers in Europe. With an annual turnover of €120bn, our members represent an essential industry for European society that businesses in almost every sector depend on. Together, we are leading Europe towards a more circular future through the endlessly recyclable potential of metals.

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¹ Directive (EU) 2018/849 of the European Parliament and of the Council of 30 May 2018 amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment

