

# Open Public Consultation on the ELV Evaluation

Fields marked with \* are mandatory.

## ELV Evaluation - Open Public Consultation

### Introduction

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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

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\*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

\* If other, please specify:

\* First name

Lies

\* Surname

Verlinden

\* Email (this won't be published)

lies.verlinden@ovam.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 other please specify:

250 character(s) maximum

\* 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

\* Scope

- ☐ International
- ☐ Local
- ☒ National
- ☐ Regional

\* Organisation name

255 character(s) maximum

OVAM, Public Waste Agency of Flanders

\* 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.

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\* Country of origin

Please add your country of origin for that of your organisation.

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| <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                            |
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<input type="radio"/> Azerbaijan	<input type="radio"/> France	<input type="radio"/> Mayotte	<input type="radio"/> Solomon Islands
<input type="radio"/> Bahamas	<input type="radio"/> French Guiana	<input type="radio"/> Mexico	<input type="radio"/> Somalia
<input type="radio"/> Bahrain	<input type="radio"/> French Polynesia	<input type="radio"/> Micronesia	<input type="radio"/> South Africa
<input type="radio"/> Bangladesh	<input type="radio"/> French Southern and Antarctic Lands	<input type="radio"/> Moldova	<input type="radio"/> South Georgia and the South Sandwich Islands
<input type="radio"/> Barbados	<input type="radio"/> Gabon	<input type="radio"/> Monaco	<input type="radio"/> South Korea
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<input checked="" type="radio"/> Belgium	<input type="radio"/> Germany	<input type="radio"/> Montenegro	<input type="radio"/> Spain
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<input type="radio"/> Benin	<input type="radio"/> Gibraltar	<input type="radio"/> Morocco	<input type="radio"/> Sudan
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<input type="radio"/> Bhutan	<input type="radio"/> Greenland	<input type="radio"/> Myanmar /Burma	<input type="radio"/> Svalbard and Jan Mayen
<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
<input type="radio"/> Bonaire Saint Eustatius and Saba	<input type="radio"/> Guadeloupe	<input type="radio"/> Nauru	<input type="radio"/> Switzerland
<input type="radio"/> Bosnia and Herzegovina	<input type="radio"/> Guam	<input type="radio"/> Nepal	<input type="radio"/> Syria
<input type="radio"/> Botswana	<input type="radio"/> Guatemala	<input type="radio"/> Netherlands	<input type="radio"/> Taiwan
<input type="radio"/> Bouvet Island	<input type="radio"/> Guernsey	<input type="radio"/> New Caledonia	<input type="radio"/> Tajikistan
<input type="radio"/> Brazil	<input type="radio"/> Guinea	<input type="radio"/> New Zealand	<input type="radio"/> Tanzania
<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
<input type="radio"/> British Virgin Islands	<input type="radio"/> Guyana	<input type="radio"/> Niger	<input type="radio"/> The Gambia
<input type="radio"/> Brunei	<input type="radio"/> Haiti	<input type="radio"/> Nigeria	<input type="radio"/> Timor-Leste
<input type="radio"/> Bulgaria	<input type="radio"/> Heard Island and McDonald Islands	<input type="radio"/> Niue	<input type="radio"/> Togo

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| <input type="radio"/> Cameroon                         | <input type="radio"/> Iceland     | <input type="radio"/> Northern Mariana Islands                    | <input type="radio"/> Tunisia                              |
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| <input type="radio"/> Cape Verde                       | <input type="radio"/> Indonesia   | <input type="radio"/> Oman                                        | <input type="radio"/> Turkmenistan                         |
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| <input type="radio"/> Central African Republic         | <input type="radio"/> Iraq        | <input type="radio"/> Palau                                       | <input type="radio"/> Tuvalu                               |
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| <input type="radio"/> Christmas Island                 | <input type="radio"/> Italy       | <input type="radio"/> Paraguay                                    | <input type="radio"/> United Kingdom                       |
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| <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                    |
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| <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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The transposition of the ELV Directive in your country?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The transposition of the ELV Directive in your country?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 3. There would be adequate availability of collection facilities within your region	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 4. The deregistration system established by your country is simple (i.e. not overly burdensome)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* 2. Are there facilities that accept used liquids removed from your vehicle?

**\* 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

**If yes, please specify:**

*1500 character(s) maximum*

(1)

**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*

(2)

**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*

(3)

**Please upload your file**

*The maximum file size is 1 MB*

*Only files of the type pdf,txt,doc,docx,ppt,rtt are allowed*



- (1) There are problems with the deregistration and traceability of vehicles or vehicle holders/owners on one hand and with the enforcement on the other hand.

In Belgium we have an efficient system for a final deregistration with a certificate of destruction (CoD). ATF's put in all data of an ELV in the software system of Febelauto which is automatically connected to the registration authority for final deregistration of the VIN. However, the registration authority makes a distinction between registration and deregistration on one hand and final deregistration on the other hand. In addition the license plate is linked with the holder of the vehicle, not with the vehicle itself. From the point there is a deregistration (not a final deregistration), the vehicle has no license plate and there is no link to the holder/owner of the vehicle and we can't trace vehicles or vehicle holders/owners to stimulate or oblige them to deliver a vehicle that has become an ELV to an ATF. In the past there was a procedure for this aspect for the European court of Justice but because of the possibility in the ELV Directive to just hold a register of final deregistrations, there was no conviction for Belgium. We are of the opinion that this aspect needs to be more detailed and restricted determined in the ELV Directive to have more legal basis to get national governments take the necessary measures for a deregistration systems including the phases of export, temporary storage and ELV. It needs to be a registration system where the holder and owner of each vehicle is always traceable. These provisions should be aligned with the European legislation about registration of vehicles.

Despite strict legislation and relatively much enforcement in relation to other waste flows, there keeps on being relatively much illegal activity.

- (2) See (1). Belgium is of the opinion that the in (1) mentioned aspects of the traceability are the mean adjustments the ELV Directive needs. Besides the aspects mentioned in (1), Belgium is of the opinion that the possibility to allow different calculation methods also needs adjustment in only one possible calculation method, with as little assumptions as possible. Other needed adjustments we like to see, are:

- More strict rules for the export of second hand vehicles (e.g. automobile inspection for export) and the distinction between second hand vehicles and ELV's (e.g. objective criteria on the basis of registration and automobile inspections). There is also a need for more accordance with EU regulations about customs.
- There is a need for more accordance with the battery Directive: the different calculation methods for the same batteries is unclear for the recycling facilities and concerned partners.
- There is a need for more accordance with new evolutions such as for the batteries of electric and hybrid cars, use of nanomaterials, increased use of plastics, increased use and need for more recuperation of critical metals.
- More collaboration between eco-design and repair/end-of-life and eco-design rules on EU level.

- (3) We answered the questions about the deregistration (question 4 and 5) that we strongly agree that the deregistration system is simple (not overly burdensome) and that we strongly disagree that the deregistration system obliges vehicle owners to indicate one of the following three options: export, off road storage or scrapping. We can further explain that in Belgium we have a simple (not overly burdensome) system for delivery of a certificate of destruction (CoD) for the ATF's which is automatically connected to the registration authority for final deregistration of the VIN. However, the registration authority doesn't have a final deregistration system for export or

off road storage. The registration authority makes a distinction between registration and deregistration on one hand and final deregistration on the other hand. In addition the license plate is linked with the holder of the vehicle, not with the vehicle itself. From the point there is a deregistration (not a final deregistration), the vehicle has no license plate and there is no link to the holder/owner of the vehicle and we can't trace vehicles or vehicle holders/owners to stimulate or oblige them to deliver a vehicle that has become an ELV to an ATF.

We answered "neutral" for the question about always providing the CoD to the last owner (question 6) because it's not always, only when they ask for it (because the CoD has little/no value due to the mentioned distinction the registration authority makes between registration and deregistration on one hand and final deregistration on the other hand). The digital version is always sent automatically to the registration authority.

We answered "neutral" for the question about financial incentives (question 7) because some of the brands have voluntary financial incentives in the form of discounts when buying a new car, and there is nothing for the other brands.

We answered "Yes, for free" for the question about defective parts (question 1) because you can always go to a scrap yard with metal parts or give the parts in an ELV to an ATF and receive some payment in relation to the metal value, but that's not a possible answer, so we chose the closest one to that.

We answered "I do not know" for the question about selling spare parts online because we see that sometimes the name of the dismantler, the indication that the dismantler is registered as ATF and or VIN number is mentioned, but certainly not always.