

ELV Evaluation Workshop

Minutes

Date: Wednesday 5th February 2020. 10:00 - 17:00

Location: Centre Albert Borschette (CCAB), 36, Rue Froissart, 1040 Brussels.

Purpose: To present the initial findings of the evaluation, based on the public and targeted consultations and literature review that we have recently completed. We would like to receive comments and feedback on these findings plus any other issues that stakeholders would like to raise. Any additional inputs received during the workshop (or immediately after) will be used to help improve the evaluation report.

It is important to point out that this evaluation is looking at the historic performance of the Directive. Therefore, although suggestions to improve the Directive are welcome, the analysis of any future changes would be the subject of separate work that may come in the future.

Agenda

10.00	Registration & coffee/tea
10.30	Introduction by the Commission
10.45	Introduction of the project (goals and process) and Q&A (Trinomics)
11.15	Presentation & Discussion on <i>Effectiveness</i> (Trinomics & Öko)
12.45	Lunch
13.45	Presentation & Discussion on <i>Efficiency</i> (Trinomics & Öko)
14.30	Presentation & Discussion on <i>Relevance</i> (Trinomics & Öko)
15.00	Presentation & Discussion on <i>Coherence & EU added value</i> (Trinomics & Öko)
15.30	Break
15.45	Presentation and summary of the successes and challenges identified with the Directive and implementation process
16.45	Summary of main conclusions, feedback sessions and thanks
17.00	End of the workshop

1 Introduction

Mattia Pellegrini (European Commission, DG ENV B.3 - Head of Unit) provided an introduction to the importance of the issue of End-of-Life Vehicles (ELV) and the increasing importance of environmental issues in the political agenda of this coming decade.

1.1 The ELV Directive background

The ELV directive was adopted in 2000 to prevent waste from end of life vehicles and to promote reuse, recycling and other forms of recovery of ELVs and their components and to improve the environmental performance of all economic operators involved in the life cycle of vehicles (eco-design).

The goal is to have vehicles manufactured in such a way that they are easier to recycle and to standardise treatment requirements with legal permits and the necessary equipment to prevent pollution. The scope of the Directive is **vehicles in category M1 and N1**.

There were changes to the ELV Directive, following the first Fitness Check in 2014. It highlighted two major challenges: illegal ELV treatment operators and illegal shipments of ELVs. There was a compliance promotion initiative to assess implementation in 2018. Following this there were amendments of the Directive in 2018 ensuring a review of the directive by the end of 2020 (Article 10a), the consideration of the feasibility of setting targets for specific materials and to pay attention to ELVs not accounted for, including shipments of used waste vehicles suspected to be ELVs.

The Evaluation of the ELV Directive started in March 2019 (with a contract of 12 months). **It is looking back at the performance of the Directive**. It views the 5 key evaluation questions, effectiveness, efficiency, relevance, coherence and EU-added value. The Commission's report on the evaluation will be published in the second semester of 2020.

Focusing on the future: the evolution will be followed by an Impact Assessment (IA) and the Commission's proposal for the review of the ELV Directive.

1.2 Workshop introduction

Rob Williams (Trinomics) provided a brief introduction on the agenda for day of the workshop, as can be seen in the agenda, at the start of this paper.

Throughout the course of the workshop the polling and Q&A application Slido¹ was used. Therefore these minutes also include information collected via this application. There were roughly 87 attendees at the workshop. From this, a total of 60 stakeholders participated in the Slido polling. Numbers varied per question and this will be noted throughout the minutes.

The first question via Slido asked in what capacity stakeholders were participating in the workshop. 60 stakeholders responded. The majority were either business associations (35%), companies (27%), or national or regional governments (20%). A much smaller group of participants were NGOs (7%), academics (3%), EU citizens (2%), EU institutions (2%), or Other (5%).

They were then asked which areas of ELV operation were most relevant to them. The largest response was Other (28%). Following this the responses were: vehicle producers/manufacture/importer (23%), Authorised Treatment Facility (ATF) (21%), End-user of secondary raw materials (12%), shredder operator (7%), post-shredder operator (2%), scrap dealer (2%), energy recovery sector (2%), second-hand vehicle dealer (2%), car repair workshop (2%).

1.2.1 Progress and plan

¹ See <https://www.sli.do/>.

This was followed by a more detailed overview of the evaluation study, its progress and future plan. The details of the information here can be found in the PowerPoint presentation that accompanied the workshop. The purpose of this workshop was then provided. This can be seen at the start of these minutes.

1.3 Effectiveness

Georg Mehlhart (Oeko-Institut) provided an overview of the data from the literature review and the consultations on general effectiveness of the ELV-Directive. The details of the information can be found in the PowerPoint presentation that accompanied the workshop.

Following this, stakeholders were provided with a chance to provide feedback on issues they disagreed with, were missing from the study or issues that stakeholders have contradictory evidence for. This feedback is presented below.

Mattia Pellegrini (European Commission) mentioned that there are number of good practices on the issues on illegal export of ELVs as used cars. These included Italy and Ireland, where cars are obliged to have passed a roadworthiness test prior to their export; and the Netherlands, where cars are assessed for potential reparability. It was asked whether there is a correlation of data here on these good practices and a reduction of exports of used cars (and subsequently fewer 'missing' vehicles). It was stated that such data could be disaggregated during the IA for a future ELV Directive. Dutch and Italian Member State stakeholders noted that their systems had only been recently implemented and it was therefore too early to know if such a correlation exists. EuRIC echoed the need to require roadworthiness tests as a mean to distinguish between ELVs and used cars, to put an end to loopholes resulting from ELVs exported as used cars. A representative of EuRIC mentioned being unaware that Ireland has introduced a similar measure as Italy but in any case, stressed that it was a positive one.

A stakeholder from ECOBAT asked if there were any links noted in the study with the ELV Directive and the Waste Electrical and Electronic Equipment (WEEE) Directive. They noted that they are aware of examples of ELVS being exported as used vehicles, also being filled with WEEE, therefore the two issues are linked. However, it was noted that although the issues are linked, it is not something that can be addressed within the ELV Directive.

A representative of EuRIC provided information on the cost for depollution. They noted that in France several studies have shown that ATFs have an average cost of €40 per ELV for treatment, whereas car manufacturers only have a cost of €4.5 per ELV for dealing with tyres etc. A member of the French environment ministry noted that these studies are available on the European Commission's website and contain useful economic data on ELV treatment.

From Slido, one stakeholder queried the presentation stating that Poland had 13 shredders. The stakeholder was unclear where these are registered as, according to them, there are only 6 shredders registered in the government database.

1.3.1 Exclusion/restrictions of hazardous substances

Yifaat Baron and Georg Mehlhart (Oeko-Institut) provided more detailed information from the study on the effectiveness of the Directive on the exclusion and restriction of hazardous substances. This included a discussion on material specific requirements (plastics, glass and metal components).

Following this, stakeholders were provided with a chance to provide feedback on issues they disagreed with, that were missing from the study or issues they have contradictory evidence for. This is presented here.

Mattia Pellegrini (European Commission) asked whether there is similar data from other car models (other than the Golf which is analysed in the study), in regard to plastic contents of vehicles. He stated that from French studies, it seems that recent vehicles seem to have a plastic content of 14%, whereas contemporary end-of-pipeline cars have a plastic content of 15%, with an increase expected in the future.

The German Environment Agency asked why the recycling definition within the ELV Directive has not been aligned with the Waste Shipment Regulation (WSR), after the revision of the Circular Economy Package. Definitions for reuse and preparation for reuse were also requested to be considered as they were both relevant for the waste hierarchy. They further asked if only the components or the whole vehicle could be reused. It was noted by the project team that this will be covered under the section on coherence. However, for the latter point, it was noted that parts and complete vehicles can be reused.

A stakeholder from RECHARGE had questions on how we assess new hazardous substances. They noted that the study presentation made no reference to a database based on REACH requirements. It was noted by the study team that this database is on our radar, however due to its recent release it is not covered by the study.

A stakeholder from the European Federation of Glass Recyclers (FERVER) noted that glass is not recycled due to Annex 1 of the ELV Directive. Here the Directive notes that it is not mandatory to recycle glass. This was suggested by the stakeholder to be amended.

On Slido, stakeholders were asked - assuming substitutes for hazardous substances are still in the development stages - how long should an exemption be renewed for? Ten stakeholders provided a response for which most stakeholders noted the exemption should be renewed for 7 years (40%). Following this, stakeholders stated 2-3 years (20%), 5 years (20%), 10 years (10%), and I do not know (10%).

Stakeholders were then asked if negative impacts of substitutes on the environment or on health should be considered in the justification of exemption. Five stakeholders provided a response, all of which stated “yes”.

Finally, on discussing what framework should be used to restrict substances in vehicles in the future, 18 stakeholders provided a response. Most believed it was relevant for the ELV Directive (39%) and the Batteries Directive (33%). Other stakeholders noted the REACH Regulation (11%) and Other (17%).

1.4 Efficiency

Rob Williams (Trinomics) provided a presentation on the study's results on the efficiency of the ELV Directive. It was noted that the study is short on data and this section therefore requires further inputs from stakeholders. Efficiency was noted as mainly focussing on the costs versus the benefits of the Directive.

Following this, stakeholders were provided with a chance to provide feedback on issues that they disagreed with, that were missing from the study or issues they have contradictory evidence for. This is presented here.

The German Environment Agency had a question regarding a statement which claimed that certain stakeholders perceive that ATFs can cover expenses with income they make from selling spare parts. The agency noted that, at the moment, prices for dismantled hulks are not competitive in Germany due to issues for shredders with disposing of Shredder Light Fraction (SLF). They also highlighted that it is important to keep in mind the costs of illegal ELV treatment and exports for efficiency. Illegal activities require a detailed examination, according to the environment agency, as their effects (i.e. unpaid taxes and environmental damages from poor treatment) are not likely to be small.

A stakeholder from ACEA noted that car manufacturers do a lot on recycling and Research and Development (R&D). They acknowledged there are costs in the treatment of ELVs, however, they are working on reducing these costs. Nevertheless, they stated that they cannot ensure anything. Furthermore, they questioned the figure of €200 per ELV for the last owner, as presented in the slides. They stated that economic viability for treatment is different across the EU, depending a lot on local markets and steel prices for component and secondary raw material sales. It was clarified by the consultants that the €200 figure was based on the French studies discussed previously. The German Environment Agency outlined that the high figure could be due to registered ATFs having to compete with the illegal sector, creating major market distortions.

A Slovakian environment ministry representative noted that Slovakia has an electronic Certificate of Destruction (CoD) system linked with (de-)registration. They further asked that if there had been research into EU countries and whether interventions helped to cover ATF costs. The consultants noted this has not been dealt with in the study.

A representative of EuRIC noted that it is difficult to provide data on costs for ATFs. This is due to the fact that they can only provide ranges or averages from a variety of their member organisations across the EU and of the differences between Member States.

A private consultant noted that the study should not underestimate the costs incurred by Original Equipment Manufacturers (OEMs). Most of them have ELV departments with high head-counts and ELV managers. Furthermore, it was noted that, in many Member States, the ELV collection companies (associations) and importers of vehicles require inspections done by consultants.

A representative of Italy noted that the reporting costs for ELV treatment increase when a country raises its ambition on recycling and reuse. They stated that not all countries collect data within the same level of detail, meaning that costs can vary and therefore lead to misunderstandings in the study.

The omission of insurance companies in the study presentation was noted by a representative of EuRIC. They noted insurance companies are an active and important part of ELV management (as they are the last owners of any cars damaged beyond repair in accidents). They stated that they were ignored by the first ELV Directive and that this lack of inclusion *indirectly* feeds illegal ELV activities - i.e. through their involvement in unregistered online sales of ELVs. A representative from the French Environment and Energy Management Agency noted that a possible solution is to link insurance payments to CoD so that only the presentation of a CoD will allow the insurance payment to cease. It was highlighted that this is done in Czechia and was deemed a positive solution. This was further supported by a representative of EuRIC explaining that, to stop paying the insurance premium, a validly issued CoD, sale or export must be presented otherwise the car insurance cannot be terminated. The German Environment Agency additionally noted that it should be obligatory to note the status of a vehicle (waste or non-waste) and that online platforms should be made legally responsible for the illegal trade on their platforms.

On Slido, two stakeholders noted that they do not agree with the reported perception that ATFs can cover their costs via the sale of spare parts. They noted that benefits and prices are decreasing every year. Another stakeholder noted that manufacturers bear costs for maintaining take-back networks, compliance assurance and for R&D for recycling technologies. A final stakeholder noted that costs (and benefits) should be shared along the recycling chain for ELVs.

Stakeholders were asked if there was anything missing from this section - e.g. actors who incur costs, types of costs and level of costs and benefits. Two stakeholders noted that the costs and damages to the environment of illegal ELV treatment are missing. One stakeholder suggested to focus more on Extended Producer Responsibility (EPR) - and if it is being fully applied (as a principle) in the ELV Directive. One stakeholder stated that the benefits of flame retardants should be considered (i.e. flame prevention and the slowing down of fires). On this topic, another stakeholder noted that more hazardous substances need to be clearly assessed. Finally, costs for take-back networks was noted by one as missing. **{N.B. - if any stakeholders can provide cost data on the issues mentioned above (and in the table below - please do so)}**

- Who bears direct costs?
 - WE have ATFs, Local and national government, what others should we include, and what costs do they incur?
- What are the cost components? (e.g. staff and equipment, plus?), we have the following stages/ aspects that incur costs. Are there others?
 - Reporting (to meet the Directive’s requirements)
 - Data collection (additional requirements)
 - Monitoring (on an ongoing basis)
 - Technical compliance (e.g. clean up equipment)
- Is data on these costs available? If so please provide whatever detail is available

The tables below summarise what we collected via our targeted consultations:

Data collection				
Stakeholder Type	Country of Origin	Hours per year	Cost per hour (€)	Other costs (€ per year) (e.g. software or training)
EU Recycling Association (ATFs)		100-200 depending on the country	12-60 depending on the country	100.000
Recycler/ATF	3 MSs	100 - 4,000	6-120	0 - 500,000

National government/administration	4	16-5,000	10 - 35	10 - 7,900
Regional government/administration	3	145 - 10,600	33 - 5,000	123 - 1,100

Reporting				
Stakeholder Type	Country of Origin	Hours per year	Cost per hour (€)	Other costs (€ per year) (e.g. software or training)
EU Recycling Association (ATF)		10-40 depending on the country	12-60 depending on the country	-
Recyclers (ATFs)	6 (3 MSs)	50 - 4,000	5 - 1200	50 - 500,000
National government/administration	5	8 - 5,000	10 - 35	10 - 6,700
Regional government/administration	4 (3 MSs)	5 - 10,600	30 - 2,300	123 - 1100

Monitoring				
Stakeholder Type	Country of Origin	Hours per year	Cost per hour (€)	Other costs (€ per year) (e.g. software or training)
EU Recycling Association (ATFs)		20-40 depending on the country	11-60 depending on the country	-
Recyclers (ATFs)	5 (3 MSs)	200 - 4,800	5 - 120	150 - 500,000
National government/administration	4	300 - 2,500	10 - 35	5
Regional government/administration	5 (4 MSs)	5 - 10,600	30 - 123	3 - 10.200

Technical compliance				
Stakeholder Type	Country of Origin	Hours per year	Cost per hour (€)	Other costs (€ per year) (e.g. software or training)
EU Recycling Association (ATFs)		10,000 variable depending on the country	14-35 depending on the country	-
Recyclers (ATFs)	5 (3 MSs)	100 - 20,000	5 - 100	100 - 500,000
National government/administration	3	300 - 4,000	10 - 35	0 - 20
Regional government/administration	5 (4 MSs)	145 - 10,600	33 - 134	20 - 1,100

1.5 Relevance

Rob Williams (Trinomics) provided an outline of the study's findings to date on the topic of relevance of the ELV Directive. The information is in the PowerPoint presentation from the workshop.

Following this, stakeholders were provided with a chance to provide feedback on issues that they disagreed with, that were missing from the study or issues and/or that they have contradictory evidence for. This is presented here.

Mattia Pellegrini (European Commission) asked if there are figures on the total volume of waste streams for lorries, buses and motorcycles. It was noted that this information is important for identifying gaps and, subsequently, whether there is a need for the legislation to cover these vehicle types. It was further noted that another end of life vehicle stream not covered by the legislation is aeroplanes. It was asked whether stakeholders had opinions on this topic (whilst clearly stating that this does not mean that they were necessarily up for consideration). Ships were outlined as being covered by other legislation and are therefore irrelevant for the ELV Directive.

A representative from the European Motorcycle industry stated that they have issues assessing the number of vehicles not used anymore by owners. The general trend suggests that vehicles are either unused on private property or are dismantled or sent to shredders by end users. Therefore, they noted that it's hard to assess the quantity of motorcycle ELVs, nevertheless it is assumed that these would not pose a large environmental risk. The Commission responded and noted that regardless of the size of impact a zero waste and zero pollution aim should be sought.

The German Environment Agency pointed out a second gap in the market of waste vehicles: e-vehicles (e-bikes, unicycles, e-scooters, wheelchairs). There was a discussion on whether they were under either the ELV or WEEE Directives. A representative of the European Motorcycle association noted that in the WEEE Directive (paragraph 4d) does not exempt 2-wheelers of any type, that are not 'type approved'. Nevertheless, as e-vehicles are owned by private citizens, it was noted that the ELV waste streams they generate need to be regulated. The European shredder association noted that the LI-ion batteries in e-vehicles are causing issues of fires in WEEE facilities. They have data that will be shared after their work is finalised. The Commission noted that this is being looked into with the revision of the Batteries and Accumulators Directive.

A member of the European shredder association noted that - in the context of ELV treatment - trucks, buses and cars have similarities. They are open to discuss their inclusion; however, they are more motivated on focusing on current priority issues - e.g. finding ELVs/vehicles of unknown whereabouts. In a similar vein, an Italian representative noted that Motorcycles in Italy are mostly treated to the same standards as cars. Therefore, the inclusion of motorcycles in the Directive should not be a large issue for Italy. They noted that there would have to be consideration that the recycling and reuse amounts will be lower (i.e. the amounts in weight will be different). A member of Volvo noted the same for trucks and buses and the inclusion of them in the ELV Directive would add value to it.

Aeroplanes were not considered relevant for this Directive, by the shredder association, as they are very different to treat and collect compared to other vehicles. The German Environment Agency agreed and stated that aeroplanes are less of a concern as they are owned by large businesses who are more likely to properly dispose of their ELVs. The Commission noted that they are not necessarily going to include aeroplanes, however there is a requirement to consider how to deal with them.

The European aluminium association noted that the presentations statement, that an increase in the use of light-weight materials will increase costs, is too broad. They noted that non-ferrous metals actually have the opposite effect. A researcher from Chalmers University noted that they provide research in the role of critical materials in vehicles. They are collaborating with the JRC who will provide projections of the data in the European context. They noted that electronics are not the only important issue, but that steel and aluminium alloys also need to be modelled in regard to their impacts.

The European Commission noted that the ELV Directive also includes issues that take place during the design of cars and onwards. However, design is likely another issue that may be necessary to discuss in more depth (under other Directives). A representative from the Spanish environment ministry stated that we should be aware of the Waste Framework Directive (WFD), in which all things are noted as waste (such as trucks and motorcycles). But within the WFD the design of products is not covered and

could be considered. EuRIC noted that this is a broad issue and it's best to focus on the types of vehicles and fractions that are currently covered by the Directive.

On Slido, stakeholders were asked whether they agreed with what was presented. One stakeholder noted that batteries need to be addressed in the Directive. Two noted that the transportation of HV-batteries is covered by manufacturers (and OEMs) not dismantlers and that the increase of light-weight material does not necessarily correlate with fewer revenues. A third stakeholder noted that on the topic of future recycling targets, that such targets need to be linked to battery packs and battery recycling yield (efficiency).

Two stakeholders provided responses on issues that the presentation was missing. The first noted that the ELV Directive has been proven as a good tool - therefore it should be extended to other vehicles to ensure the same good practice across more ELV types. The second noted that safety aspects are omitted. They believe that OEMs should provide rescue information on electric vehicles that should be available to first line emergency services.

1.6 EU added value

Rob Williams (Trinomics) outlined the study's findings to date on the topic of EU added value of the ELV Directive. The information can be found in the PowerPoint presentation.

Following this, stakeholders were provided with a chance to disagree with anything that had been presented, provide feedback on issues that were missing from the study and/ or provide any contradictory evidence regarding the issues that had been presented. This feedback is presented here.

On the issue of 'level playing field' and online sales, a representative from Galloo noted that many spare parts today are sold online, via various platforms. There is no traceability on such platforms, which therefore needs to be reviewed. They stated that in the US you cannot sell spare parts (online or offline) for a vehicle without being registered as a commercial company. This was suggested as a possible solution for Europe. A representative from the French environment agency noted that there is a lack of data and that we need to know what happens to spare parts after they are sold.

A workshop participant noted that she thinks the EU situation is doing very well with regard to dealing with ELVs. They noted it would be useful to also show this positive aspect (e.g. tonnes of resources recovered as a result of the ELV).

From Slido, four stakeholders provided additional comments on the topic of added value. The first noted that before the ELV Directive's scope is extended there must be added value demonstrated for improving waste management. Two stakeholders noted that the harmonisation of implementation of the Directive in Member States was required (particularly for vehicle registration and deregistration). A stakeholder outlined the need to focus on socio-economic aspects in the study.

1.7 Coherence

Rob Williams (Trinomics) and Yifaat Baron (Oeko-Institut) provided an outline of the study's findings on the topic of EU added value of the ELV Directive. The details of the information here can be found in the PowerPoint presentation that accompanied the workshop.

Following this, stakeholders were provided with a chance to provide feedback on issues from the presentation that they disagreed with, the were missing and/ to that they have contradictory evidence for. This is presented here.

On the issue of small e-vehicles, the German Environment Agency representative noted that scooters without seats are included in the WEEE Directive, however three wheelers and scooters with seats are not covered. This highlights a gap of coverage that should be dealt with. Furthermore, they noted that a significant amount of SLF needs to be disposed of securely (i.e. incinerated not landfilled) as it contains Persistent Organic Pollutants (POPs). They asked if post-shredder separation is legal. It was responded by the consultants that only the European court could decide on the legality of this issue.

A consultant in the ELV field provided a comment on the dismantling of batteries (as noted in a bullet from the PowerPoint). They noted that the bullet should state the "removal" of batteries instead. Furthermore, in another bullet point, it was noted that it is good to include a definition for second life.

On the topic of techniques for density separation, a representative from Galloo provided some comments. They noted that separation is an option to separate (post shredder) plastic fractions with flame retardant. The heavier fraction that contains traces of the flame retardant are then treated according to the POP Regulation (i.e. incinerated not landfilled). It was further noted that this denser fraction includes a share of Polyvinyl chloride (PVC) plastics with a chlorinated fraction, which could be recycled. It was estimated that some 10-15% of this recyclable plastic was lost to this fraction. A member of EuRIC noted that they gather most types of plastic. They noted that they have two experts represented at the Basel convention and that the discussion had moved to the international level. They stated that they have a lot of literature to share on this issue.

The German Environment Agency representative raised an issue on the coherence of the WFD and ELV Directive. They also noted that nothing has been mentioned on EPR. They highlighted that the WFD has exemptions in article 8a of the Directive and it could be useful for the ELV Directive. A stakeholder from Hutchinson France asked - on the topic of EPR - that if their name is on a vehicle part, are they regarded legally as the producer? A consensus was not reached on this issue.

On Slido, stakeholders mentioned a couple of issues where they disagreed with the presentation. One stakeholder noted that there is no mention of the lack of coherence between the ELVD and the European Green Deal and Circular Economy Action Plan. A second stakeholder noted that it was mentioned that for EU coherence there should be a minimum content of recycled materials present in vehicles. However, the stakeholder noted that this should only be true for plastic fractions but not other fractions. A stakeholder noted that the criteria for exemptions from heavy metal restrictions are very different between the ELV Directive and the Restriction of Hazardous Substances (RoHS) Directive, which needs to be aligned.

Stakeholders provided three comments on issues that were missing from the presentation (via Slido). They noted that the Circular Economy Action Plan could be made coherent with the ELV Directive if the

latter included waste prevention measures. They stated that they think a definition for second life should be added to the Directive. A third stakeholder wrote that batteries require a dedicated and coherent approach on their treatment, regardless of whether that was included in the Batteries or ELV Directive.

A Slido poll asked waste management sector stakeholders if they thought ELV shredders were aware of the prohibition of landfill disposal of SLF containing DecaBDE. Only five stakeholders provided a response, from which many said 50-25% of operators are aware (40%), and the rest noted either that they do not know (40%), or 25-0% of operators are aware (20%).

A second poll asked what framework should be used to restrict additional substances in vehicles in the future. Ten stakeholders provided responses, of which 90% noted it should be the ELV Directive. Only one stakeholder stated “Other”, noting the Batteries Directive should have been provided as an option.

1.8 Summary of feedback received

A summary of the inputs received throughout the workshop were created and presented by Rob Williams (Trinomics). This can be seen in the PowerPoint presentation.

Following this, stakeholders were provided with a chance to provide any final feedback on issues that were missing from the discussion throughout the course of the workshop. This is presented here.

A member of the European recycling association noted that the Directive could be better focus on the quality of plastic or creating synergies between shredders and other industries. They further noted that another missing point is any inclusion of the requirements on vehicle design (e.g. to design for ease of recycling).

One stakeholder from Sweden noted that there needs to be a focus on how to get more ELVs for proper treatment and on how to avoid illegal treatment. They suggested focusing on incentives. They stated that Sweden has lots of ELVs that are temporarily deregistered and never brought back into the system. They believed an incentive could ensure they are brought to ATFs. EuRIC noted that any incentives should use a carrot and stick approach (and could be insurance based, like in Czechia). ACEA noted that on shared responsibility (also for OEMs) there is a legal duty to return vehicles to ATFs. Therefore, it shouldn't be necessary to provide an incentive for something that is a legal obligation.

The shredder association noted that we need to focus on recycled content targets for plastics in new vehicles. They can provide these recycled plastics currently, however, there needs to be official legislation to ensure a scale-up of market use. A representative from Galloo noted that recycled plastics are used by some manufacturers, for example in the Renault Scenic. Renault were regarded as a leader in this field (using roughly 30% of its plastics from recycled contents). The German Environment Agency noted that there should be a standardised methodology to calculate the percentage of recycled content required in a vehicle, otherwise they noted it would be difficult to have such a target. A stakeholder from the EU Steel association noted that there are targets for recycled contents, but they are incorporated in ecodesign legislation (but this approach could be transferred). They noted that it is a complicated thing to calculate, as the secondary raw material markets are not the same for every material. ACEA noted that on quotas and volumes that details on all models of cars

and models of components are required to achieve any targets. They noted that an 85% target is a tremendous success for recycling of such a complex product. The shredder association mentioned that there is a standard for measuring recycled content in energy related products (pre- and post-consumer content). They noted this approach could be transferred to new vehicles.

The Italian Member State representative noted that any changes to the ELV Directive should be clear and easy to implement, allowing for a homogenous treatment of ELVs in all Member States.

The German Environment Agency representative stated that the Directive does not mention the quality of recycling. They noted that this should not just avoid backfilling but ensure high-rates of plastic and metal recycling. It should also aim to avoid downcycling (i.e. copper contamination in steel).

1.9 Next steps

Rob Williams (Trinomics) noted that the PowerPoint presentation will be sent around to everyone, following the workshop. It was noted that these minutes would be drafted and circulated to the attendees to provide additional comments (and to provide evidence for such comments).

The deadline for providing comments was 15 days.

Following this, the internal reporting will be completed in the next couple of weeks, which will lead to the European Commission publishing their official evaluation. The issue for them is prioritising the issues discussed about the ELV Directive (many of which were discussed at the workshop).

Artemis Hatzi-Hull (European Commission) closed the workshop, emphasising that the evaluation is retrospective. It therefore looks at what has been achieved since the Directive was in place (i.e. assessing its performance). The next step will be an Impact Assessment, on how to change the Directive. This will lead to a revision of the Directive. This will include an amendment of the official decision on reporting.

Finally, it was noted that the European Commission website² has extensive literature on this issue (from EC and MS studies).

² See, https://ec.europa.eu/environment/waste/elv/events_en.htm.

Annex A - List of attendees

This list only includes those that signed in on the registration sheet and does not provide the number of stakeholders per organisation.

Figure 0-1 - List of attendee organisations/stakeholders

Attendee stakeholders
Ambit
Arcadis
Association of European Automotive and Industrial Battery Manufacturers (EUROBAT)
Association of the German Insurance Industry
BASF
Berzelius Metall
BIL Sweden
Cantabria Business Transportation Group (Agrupación Empresarial de Transporte de Cantabria)
CarTakeBack
Chalmers University
Copper Alliance
Department of Environment, Food and Rural Affairs (UK)
Derichebourg
DETOMSERVE
Ecostandard (ECOS)
Environment and Resource Authority (Malta)
Environmental Protection Agency (Denmark)
Environmental Protection Agency (Sweden)
European Aluminium
European Automobile Manufacturers' Association (ACEA)
European Electronics Recyclers Association
European Environment Bureau
European Federation of Glass Recyclers (FERVER)
European Group of Automotive Recycling Associations
European non-ferrous metals association (Eurometaux)
European Recycling Industries' Confederation (EuRIC)
Exide technologies
FEBELAUTO
Federal Association for Secondary Raw Materials and Waste Management
Federal Environment Agency (Germany)
French Automobile Manufacturers Committee (CCFA)
French Environment and Energy Management Agency
Galloo
Hutchinson Group
International Bromine Organisation (BSEF)
International Lead Association

Japan Automobile Manufacturers Association
Kreab
Mazda Europe
Ministry of Climate (Poland)
Ministry of Environment (Lithuania)
Ministry of Environment (Romania)
Ministry of Environmental Protection and Energy (Croatia)
Ministry of the Ecological and Inclusive Transition (France)
Ministry of the Environment (Finland)
Ministry of the Environment (Slovakia)
Ministry of the Environment and Food (Denmark)
Ministry of the Environment and Spatial Planning (Slovakia)
Ministry of the Environment, Waters and Forests (Romania)
National Association of Vehicle (Associazione Demolitori Autoveicoli)
National Automobile Federation (FNA)
Nissan
Oeko-Institut
Polymers
Portuguese Environment Agency
ELV Consultant
Public Waste Agency of Flanders (OVAM)
RECHARGE Batteries
The European Association for Electromobility (AVERE)
The European Steel Association (EUROFER)
The Ministry for Ecological Transition and Demographic Challenge (Spain)
The Motorcycle Industry in Europe
The Professional Federation of Recycling Enterprises (FEDEREC)
The Spanish Association for the environmental treatment of out-of-use vehicles (SIGRAUTO)
Toyota Europe
Transport & Environment
Trinomics
ValorCar
Volkswagen
Volvo Group
Wolniewicz
Yahoo!
ZVEI