Feedback to the roadmap on the ELV Directive

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EUROPEAN ALUMINIUM

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European Aluminium welcomes the Roadmap of the European Commission (EC) on "Legislation on end of life vehicles". As sector, we continue to feel the need for the ELV Directive today, potentially improved in some aspects, being the only one dealing with the End of Life and treatment of vehicles and incentivizing recovery and recycling, thus representing an indispensable piece of legislation in the framework of the circular economy. Despite the positive effects of the ELV Directive, however, **we feel that there is space for improvement** and we agree with the content of the roadmap document.

- In particular, we feel the need for the EC to **urgently act to reduce the illegal shipment of ELVs and their illegal treatment** and to improve the registration and deregistration system. These aspects negatively affect the economy and the environmental vision pushed by the European Commission due to the loss of valuable secondary materials with a high content of embodied energy.
- We strongly **support the alignment of the ELV Directive with other European legislation** in place, especially the alignment with the Waste Framework Directive and the definitions there included. As explicitly mentioned in the Waste Framework Directive, backfilling is not recycling. For this reason, **backfilling should not count for reaching any recycling target and this should also be applied in the ELV Directive**.
- We feel that, when assessing the feasibility to introduce targets per material, it will be important to consider the necessity to **keep overall targets in place even if targets per material would be introduced**. In other words, if targets for specific materials would be introduced we strongly suggest keeping also the overall recovery and recycling targets as described currently in Article 7 of the ELV Directive. This will ensure that there won't be a shift towards the use of materials that have not a specific target in place and that are not recyclable.

The Ex-post evaluation report sees as an issue that the ELV Directive may not yet sufficiently address material technology development, such as increased use of plastic and carbon in production of light vehicles and that there would be a trade-off between resource efficient technologically advanced materials and their recyclability. **European Aluminium would like to stress that making a vehicle lighter and recyclable are compatible goals**. For example, making a car lighter and more fuel efficient using aluminium or high strength steel instead of standard steel does not make the vehicle more difficult to recycle. So, if a trade-off would occur, this would primarily be due to the choice of less or non-recyclable materials that the ELV Directive should not promote. If its goal remains to limit the production of waste and to increase the rates of reuse, recycling and recovery, the ELV Directive should continue to focus on the end-of-life stage and on the prevention of waste from ELVs. This is also essential to continue stimulating the development of modern recycling and valorization processes for materials less or non-recyclable today.

- We would like to also invite the EC to clearly **define the boundaries between the Batteries Directive and the ELV Directive.** In particular, aiming at maximizing the recycling and recovery of the materials used to build the vehicles, we invite the EC to assess and specify whether the battery cell should be included in the calculation of the recycling and recovery targets of the ELV Directive or not.

The most cost efficient end-of-life vehicle treatment is only achievable if all actors feel concerned. Post-shredder treatments are of course part of the solution, but dismantling before shredding also makes sense for several parts that can more easily be recycled into the same application family.

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- Considering that, we would like to invite the EC to **explore and assess the effect of imposing mandatory dismantling of specific parts before shredding** and separate treatment of these dismantled parts. Examples of parts that could be dismantled before shredding to improve the recycling performance are for example glass, engines, heat exchangers, doors.

The easiness and economic feasibility of dismantling before shredding depends on parts location but also on design for dismantling.

- The Waste Framework Directive recently amended, further strengthens the "waste hierarchy" by placing prevention, re-use and recycling clearly above landfilling and incineration. This should be reflected also in the ELV Directive, strengthening in particular the indications included in Article 4 of the current Directive related to prevention. **The design and production of new vehicles shall take into account design for recycling, design for dismantling and design for reuse.**
- To facilitate the most appropriate treatment of ELVs by recyclers and dismantlers it would be **important to have more complete information in the International Dismantling Information System (IDIS)**, including also the materials used in each component and the indication for the disassembly and recycling. We would like to invite the EC to assess in the evaluation this aspect as well.
- For the rest of the ELV that could not be dismantled, **ELV processing plants and manufacturers should be required to accelerate development of post-shredder separation technologies**.

European Aluminium is available to provide further clarifications and data regarding the aspects mentioned in this feedback and to be involved in the next steps of the evaluation.

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