



**ACEA Position on Dismantling of End-of-Life Vehicles  
by Non-Authorized Treatment Operators**

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The European Car Industry assumes its producer responsibilities as mandated by the ELV Directive 2000/53/EC. It successfully sets up EU-wide End-of-Life Vehicle collection networks based on bilateral contracts. For any contract based partnership, the infrastructure quality has been and will continue to be a pre-eminent condition for the selection of a contract partner.

With the enactment of the ELV Directive, requirements for treatment operators were defined in Annex I. These pre-conditions are to be fulfilled by treatment operators, should they apply for a new or for a prolongation of an existing license allowing them to take-back and treat End-of-Life Vehicles on a commercial basis.

Therefore, today's authorized operators have successfully improved their facilities and operating conditions to meet the required environmental standards. Due to licensing procedure, authorized facilities are known to Environmental Protection Agencies and are subject to regular environmental auditing.

Since ELVs are an attractive product with a positive value, other players in the marketplace are also interested and try hard to capture a share of the volume available. However, these operators in many cases are not fulfilling any of the requirements of Annex I of the ELV Directive nor are subject to any national auditing or supervision.

This does not create a level playing field, with the illegal operator having a competitive advantage over authorized facilities, thus creating distortion in the marketplace.

Hence, ACEA urges all policy makers in Europe to enforce existing legislation so suppress illegal ELV treatment. Enforcement of existing legislation is vital in creating a level playing field in the ELV recycling business.

A well functioning deregistration system, where the so-called certificate of destruction (CoD) plays a central role, is a prerequisite. In addition, it is also important to supervise and/or restrict loopholes allowing to circumvent deregistration procedures based on CoDs.

ACEA proposes a number of action items (non exhaustive) to better enforce national existing legislation:

- Link vehicle deregistration to *national* registration system, if not already in place.
- Ensure that the national process has no possibility of leakage that enables continued activity by illegal operators.
- Close supervision and prosecution of illegal treatment operators with mandatory shut-down of facility.