

## **Further comments and suggestions in the context of the public consultation on end-of-life vehicles (ELV) – Netherlands**

The government of the Netherlands has the stated ambition to make the Dutch economy fully circular by 2050. This means that products and services offered in this economy need to be fit for such a system. Therefore, the Netherlands welcomes the preparatory actions for the revision of the Directive on end-of-life vehicles (ELV) and strongly supports a comprehensive scope of the revision, taking into account the full life cycle of vehicles and aligning the ELV better with the Triple R directive, from eco-design and the uptake of recycled content to recycling, and the consideration of vehicle types that are currently left out of the scope of the Directive.

On recycled content the Netherlands calls for further specification of the current provision on the use of recycled materials in new vehicles by setting concrete and measurable targets.

The Netherlands welcomes the emphasis on the problem of end-of-life-vehicles that are not accounted for, and the recognition of export outside the EU in this context. The Dutch Environment and Transport Inspectorate (ILT) conducted a thorough study on the quality of used vehicles exported to African countries from the Netherlands (<https://bit.ly/2Ut6Wsc>). The EU exports over a million light duty vehicles annually to African countries, of which about 3% exported from the Netherlands. The inspectorate concluded that many of these vehicles are comparable to those we consider end-of-life-vehicles in Europe. These vehicles are old, below euro 4 emission standards, have high mileage and often do not have a valid periodic roadworthiness certificate. Some also fail tests for emission requirements.

These results show that action needs to be taken to improve the quality of used vehicles exported from Europe, and to retain vehicles that are not fit for export for environmentally sound treatment and recycling in Europe. As vehicles in the EU become cleaner, safer, and more efficient, the quality of exported used vehicles should also gradually improve to follow this trend. Therefore as a first step, the Netherlands will explore possible measures at the national level. However, for a truly effective approach, EU measures are needed to improve and regulate the export of certain used vehicles outside the EU as a whole. Prerequisites for all this is a harmonized vehicle registration in the Member States, considering the full life cycle of vehicles, including the cross-border information exchange of the respective vehicle data, via already existing exchange platforms like EUCARIS<sup>1</sup>.

We therefore call on the Commission to further prioritize this issue in the context of the revision of the ELV Directive, and to consider as a policy option, in addition to EU-harmonized vehicle registers and information exchange, a valid and recent road worthiness certificate as a prerequisite for export to outside the EU as well as to consider means to discourage or prevent export of used vehicles with a low emission standard. In this context we ask the Commission to take into account efforts by low- and middle-income countries to develop import restrictions on old and low emission class used vehicles, notably by the ECOWAS Member States. From 1 January 2021, only used vehicles that meet EURO 4 emissions standards will be permitted into ECOWAS

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<sup>1</sup> EUCARIS is a cooperation between all the national vehicle registration authorities in the EU + Iceland, Norway, Switzerland and Liechtenstein, based on the EUCARIS Treaty. The cooperation started in 1994 to fight, among others, international vehicle crime. Nowadays the EUCARIS cooperation of countries offers a general information exchange platform for all kinds of mobility and transport related data, based on EU legislation and bi- and multilateral treaties and agreements (see also [www.eucaris.net](http://www.eucaris.net)).

countries. Other countries and (sub) regional bodies are considering similar regulations. Cooperation with the EU/MS as the largest exporter of used vehicles (accounting for 54% globally) would be desirable in this regard.

Finally, we would like to draw your attention to legal and environmentally sound shipments of second hand vehicles for prolonged use in third countries (under the conditions described above) in relation to EPR. Environmental and health problems will arise in case third countries lack a proper system for handling vehicles that reach their end-of life situation and becomes waste. In such circumstances vehicles are essentially transferred from a mandatory EPR scheme with adequate collection and treatment of ELV, to a situation without these conditions and facilities and with a risk of losing valuable raw materials. We call on the Commission to examine ways:

- to ensure that all producers, whether based within or outside the EU, supplying vehicles to the EU market, finance ELV collection and recycling including vehicles that are subsequently exported for second-hand use;
- to set out targets for the collection and recycling of ELVs to radically reduce the amount of such waste that undergoes substandard treatment inside or outside the EU;
- to set out the minimum requirements to ensure that shipments of ELVs are not disguised as shipments of used vehicles through testing and documentation on the nature of the shipment as described above.

Producers of vehicles should in principle be responsible for the environmentally sound management of ELV no matter where their products become waste.