

## Proposal Regulation End-of-Lives Vehicles

Febelauto has been a producer responsibility organization for end-of-life vehicles for almost 25 years and, since 2016, also for batteries of electric and hybrid vehicles in Belgium and in the Grand Duchy of Luxembourg.

Febelauto has also been calling for more traceability for end-of-life vehicles for more than 20 years, first in Belgium but also throughout Europe.

Therefore, we welcome the revision of the End-of-Life Vehicles Directive and have thoroughly reviewed the proposed End-of-Life Vehicles Regulation.

Nevertheless, we remain with many questions and have collected them by chapter below:

### Preamble:

1. 39 euro extra per new vehicle → for all member states?
2. Point 57: ELV without HEV battery or all batteries?
3. Positive point (+): product vs waste
4. Point 58: dedicated assessment?
5. Point 45: ELV only treated in authorized treatment facilities

### Chapter 1:

1. Expanding the scope: 60 months?
2. Exclusion for expanding the scope (several articles) after 60 months still valid?
3. Definition 'removal': positive point (+)
4. Definition 'ELV': economic total loss is considered ELV: positive point (+)
5. Annex I, part A: 'individual technical assessment': who (assurance, garage owner, ...)?
6. Annex I, part B → no reference in the text? Addition of Part B in the definition of ELV?

### Chapter 2:

1. Vehicle type = vehicle categories?
2. Removal and replacement for joining and sealing of EV batteries: positive point (+)

### Chapter 3:

1. Article 11, §2: Free of charge and 'may collect charges' → meaning?

### Chapter 4:

1. Article 9 (b): cost of the register for producer?
2. Article 19 → reference to article 8a (3), points (a) to (d) Directive 2008/98/EC do not match!
3. Article 19, §3: transparency of the individual systems?
4. Article 20: against the free market principle/competition law?
5. Article 21: fee CAN BE modulated
6. Article 21: weight of the vehicle: EV with or without battery? Modulation: cheaper/more expensive for heavy vehicles (more materials)?
7. Article 22, §1: cost differs per country? European PRO?
8. Article 23, §4: why and what added value has a 'waste management operator'?
9. Article 23, §4: 1 year storage before becoming ELV? Why so long?
10. Article 24, §2: except the electric vehicle battery?
11. Annex VII, Part B, 3 (a) en (b) → too far-reaching. Per vehicle? (for fee modulation)



12. Annex VII, part B, 2 (a): airbags can be neutralized in the shredder and not taken out of ELV first → Gained from experience, there are too many risks when removing airbags from ELV
13. Annex VII, part C: why points 4, 6, 7, 8, 10, 11, 12 are mandatory removal?
14. Article 30, §2: Is PST still available and what is the efficiency of PST and how can it be calculated?
15. Article 33: incentives?
16. Article 34: waste management operators vs economic operators? It means tightening the targets by first removing the batteries from the ELV?
17. Article 34: every waste management operator or consolidated?
18. Article 35: what about inert waste?
19. Article 38, §6: not clear
20. Article 52?

We remain at your disposal if you have any further questions.

The Febelauto team