

Wir leben Autos.



Cirstin Caspary

ELV – WE TAKE CARE

An automaker perspective on the ELV in the EU and Poland

Opel / Vauxhall Europe
ELV

www.opel.com



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We acknowledge our responsibility to deliver sustainable products from cradle-to-grave

Major progress towards this goal was achieved:

- Very limited amount of waste to landfill still comes from the automotive sector, although around 8 million vehicles reach the end of their lives each year
- The industry can demonstrate recyclability and recoverability requested by legislation, leading to reduced waste-to-landfill and improved car recyclability
- Manufacturers have cut content for the heavy metals down to almost zero

Product is the industry's core competence; an integrated approach (with the recycling industry, legislators, customers) is the best way to ensure continued progress in recycling

End-of Life Vehicles Directive

PRIORITY FOR AUTO INDUSTRY



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Only defined substances and materials are allowed already in the **DESIGN AND DEVELOPMENT** phase. There is a ban on heavy metals, for example, because of the required recycling later on.



Standards and material restrictions, e.g., for chemicals and electronic components, have to be taken into account in **PRODUCTION**.



Information about components, parts, and their disposal that are required by law has to be filled out in **SALES**.



ELV Operation

RECYCLING takes place today with almost all materials – in the automotive industry and elsewhere. These materials are extracted from old cars and recycled.



Standards have to be met, such as for replacement parts and the disposal of parts subject to wear and tear during the vehicle's **USEFUL LIFE PHASE**.



ELV coordinates and ensures that the environmentally friendly disposal of the vehicle is already being considered in the design phase



TAKE-BACK networks have to be set up and maintained in accordance with legal requirements in all of our markets.

End-of-Life Vehicles Directive

THE HOLISTIC APPROACH



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The End-of-Life Vehicle Directive and Directive on Reusability, Recyclability and Recoverability of motor vehicles set new requirements for vehicle recycling

The ELV directive is under the EU waste regime & waste hierarchy which determines: prevention, re-use, recycling, recovery and finally disposal

Today, new vehicles must demonstrate reusability and/or recyclability of at least 85%, and reusability and/or recoverability of at least 95% by weight, if measured against the international standard ISO 22628

Auto makers support the principle of producer responsibility, but also their role in helping consumers their ELVs get recycled properly

Recycling remains an issue for which the contributions of all responsible stakeholders should be considered

End-of Life Vehicles Directive

END-OF-LIFE VEHICLE RULES



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Shared responsibilities
of all
economic operators

Manufacturers
and Importers

- Set up a market specific take back network
- Comply with substance restriction requirements
- Provide dismantling information
- Design for sustainability
- Confirmation of the recoverability (95%) within the Vehicle Type Approval System

Last Owner

- Deliver ELV to take back site
- Vehicle is complete and free of waste

Treatment
Operators

- Take back ELVs
- Environmentally sound treatment
- Achievement and reporting of the recycling- and recovery quotas

Government

- Licence shredders and dismantlers
- Enforce technical standards for ELV treatment
- Install registration- and deregistration system

End-of Life Vehicles Directive

SHARED RESPONSIBILITY



- Car manufacturers face a major challenge, balancing goals in recyclability with targets in other areas including CO² reduction, improved safety and reliability, while making sure vehicles remain affordable for the customer
- Regulatory targets should generate socio-economical and environmental gains
- Product-focused rules should be identical across the EU to maintain the integrity of the single market

End-of Life Vehicles Directive

EU: A CASE FOR SIMPLIFICATION



- ELV EU Directive issued October 2000
- To harmonize legislation and requirements within EU, all member states had to transpose EU Directive into national laws by April 2002 (new member states with individual timing)
- ELV Law in Poland introduced as of 2006 and with subsequent changes transposes the ELV Directive locally
- ELV Law in Poland planned to be revisited
 - EU Commission infringement
- Political, economic, social and environmental aspects

End-of Life Vehicles Directive

POLAND – 6 YEARS OF HISTORY



Poland received an INFRINGEMENT for transposition of EU Directive

Skimming of material to ILLEGAL OPERATORS

Therefore, Authorised Treatment Facilities (ATF) demand SUBSIDIES

LOSS OF TAX due to illegal operators

ECOLOGICAL threats due to uncertain / incorrect treatment of cars ending up in illegal channels

End-of Life Vehicles Poland

POLAND – KEY CHALLENGES



Due to the lack of material, ATFs may not achieve break even volume to work on profitable level

⇒ they have to rely on subsidies

Gap in state budget as we have to assume that illegal operators are not properly paying taxes

Assuming that ATFs very often get incomplete or cars containing waste, we have to assume that this has significant negative impact on recycling / recovery quota

Due to existence of illegal treatment, environmental sound treatment of material is not guaranteed

End-of Life Vehicles Poland

POLAND – CONSEQUENCES



It is in the obligation of a last owner to bring his car in a proper to an ATF which means:

- a. "vehicle does not contain the essential components of a vehicle [...],
- b. or contains waste which has been added to the end-of life vehicle."

(2000/53/EC, Art. 5.4)

For this reason, there is no justification to define an ELV as negative value ELV

EU Directive (Art. 5.4), as well as ACT on ELV legislation allows ATF to demand for financial compensation

With regard to incomplete cars: instead of a fixed fee defined by ELV law, we suggest that ATF can negotiate with last owner according to market conditions

Material Quality

POLAND – PROPOSAL / GUIDANCE



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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

At the vehicle's end of-life, collect all vehicle documents in central place at national level

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

Fight Against the Illegal Network

POLAND – PROPOSAL / GUIDANCE



Fleet renewal scheme (scrappage program)

flow of ELVs to legal Network

better for environment and road safety

increased Treasury income after scrappage bonus

Demand and Supply Side

POLAND – PROPOSAL / GUIDANCE



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We are proud of having a long term and sustainable relationship for almost 10 years countrywide with our dismantling partners:

We publish our contracted dismantlers as Opel Preferred Partner

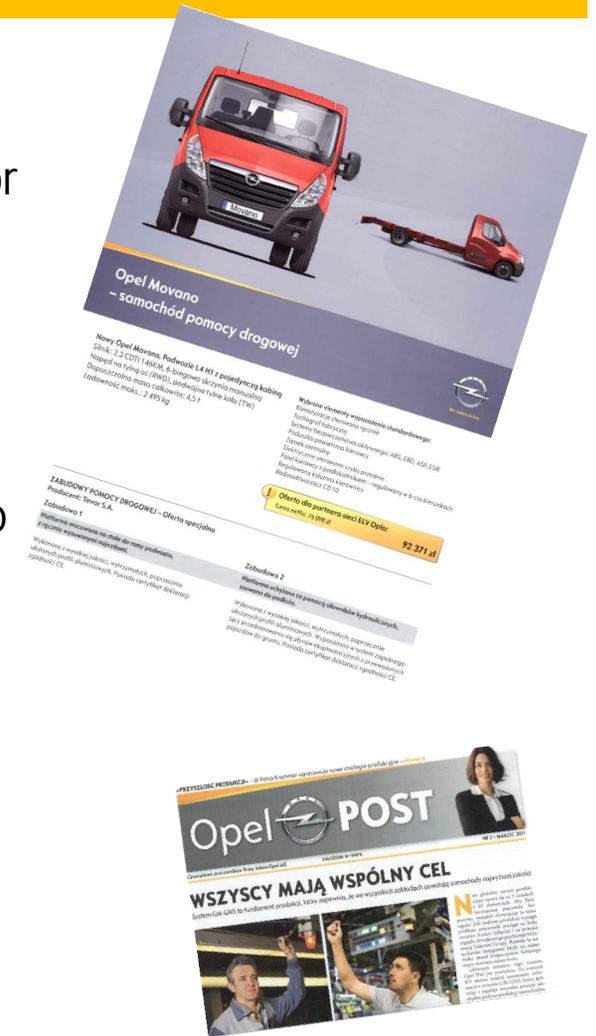
They get access to ELVs of all further GM brands

They can benefit from preferred treatment, e.g. Opel sales or scrap campaigns

We offer a dedicated responsible person to maintain direct and ongoing communication

We submit a Regular Opel Newsletter

We offer special offerings, e.g. discounts on Opel Movano Transporter



Long term win-win relationship

HOW WE LIVE PARTNERSHIP



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We acknowledge and fully meet our requirements from End-of-Life Vehicles Directive during all stages from design, production,... to take-back

Due to the material value of an ELV, the process of treatment is a positive business case.

However, ATFs face economical threats as illegal operators are subducting material.

This leads to negative environmental and economic consequences
This needs to be attacked not only on national, but also on EU level.

GM Poland is offering a sustainable and valuable long-term relationship to or contracted dismantling partners

Summary

HAVE A WIN-WIN-SITUATION





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THANK YOU

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