

In the context of the revision of the End of Life Vehicle Directive and following the workshop on “The Evaluation of the ELV Directive” on the 5th of February, European Aluminium would like to share its top priorities.

The following points are focusing on issues that can improve the recycling of End of Life Vehicles (ELVs) in general and the recycling of aluminium from these vehicles in particular.

1. There is no need for minimum recycled content rates for materials like aluminium.

Introducing a minimum recycled content for materials like steel and aluminium makes no sense. These materials are already today showing high recycling rates. Approximately 95% of the aluminium in an End of Life Vehicle is profitably recycled and all secondary material put on the market will be used for new products. On the contrary, if a minimum recycled content target for aluminium components in cars would be introduced, it can lead to unintended consequences.

Due to the long lifespan of volume-wise dominant aluminium applications such as buildings and transport vehicles, the available quantity of end-of-life aluminium scrap today is limited to what was put on the market many years ago. As this limited scrap volume cannot meet the increasing demand for aluminium, the shortfall must be met by the primary aluminium industry

Imposing minimum recycled content figures for cars will simply take recycled aluminium from other products. While this may reduce the environmental impact of producing cars, it will not affect the overall picture. Instead, it will only displace the burdens and the benefits from one product to the other and may induce longer scrap transportation distances.

2. Well proven aluminium solutions that can combine the goals of making a vehicle lighter AND fully and economically recyclable already exist

Making a car lighter and more energy efficient using aluminium instead of steel does not make the vehicle more difficult to recycle. The ELV Directive should not promote less or non-recyclable materials. If the goal of the ELV Directive 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 promote materials that are easy to recycle, in particular metals like aluminium.

3. Design for recycling and post shredder separation technologies should be incentivised further

The most cost-efficient End-of-Life Vehicle treatment is only achievable if all actors work together. Post-shredder treatments are of course part of the solution but dismantling before shredding also makes sense for parts that can easily be recycled into similar applications again (e.g. hoods, doors). The easiness and economic feasibility of dismantling before shredding depends on parts location but also on if the product was designed for easy dismantling. The design and production of new vehicles shall therefore consider design for recycling, design for dismantling and design for reuse. To facilitate the most appropriate treatment of End-of-Life Vehicles by recyclers and dismantlers it would be important to introduce a better tracking of materials put in the car, for example through the International Dismantling Information System (IDIS) or other methods. The information should include the materials and alloys used in each component and the instructions for the disassembly and recycling.

For the remaining part the End-of-Life Vehicle that could not be economically dismantled, ELV processing plants and manufacturers should be required to accelerate development of post-shredder separation technologies that will be able to sort aluminium alloys in different alloy families.

4. The EU must act to get a better understanding of where the End-of-Life Vehicles of unknown whereabouts end up. The EU must also take swift action against any illegal shipment or treatment of End-of-Life Vehicles

The large number of End-of-Life Vehicles with unknown whereabouts must be addressed. The deregistration system must be improved with the aim to stop any illegal shipment or treatment of End-of-Life Vehicles. These aspects negatively affect the economy and the environmental vision pushed by the European Commission due to the loss of valuable secondary materials.