

SHIPMENT AND DECLARATION OF USED AUTOMOTIVE COMPONENTS [CORES] INTENDED TO BE REMANUFACTURED

A recommendation of APRA Europe for their members.

Introduction The economy in Europe needs to be transformed into a Circular Economy.

This is an essential part of the "European Grean Deal" <u>The European</u> <u>Green Deal - European Commission (europa.eu)</u>. Within the European Circular Economy Action Plan <u>Circular economy action plan - European</u> <u>Commission (europa.eu)</u> the requested legal changes are defined.

Within this framework the existing End of Live Vehicles Directive is under review End-of-Life Vehicles - European Commission (europa.eu) and will be replaced by a new End of Life Vehicles Regulation [ELV-R] expected to be in place and binding in EU by mid of 2024.

Analysis The aim of the new regulation is to make the automotive sector circular, maximize the efficient use of resources, and to protect the environment.

Proposal for a Regulation on circularity requirements for vehicle design and on management of end-of-life vehicles <u>Proposal for a Regulation on</u> <u>circularity requirements for vehicle design and on management of endof-life vehicles - European Commission (europa.eu)</u> to set a clear target that used automotive components should be remanufactured.

Therefore, it is clearly stated that parts intended to be remanufactured are not waste.

"Recognizing the potential of remanufacturing [...] in the automotive sector, and their contribution towards circular economy, it is necessary to provide legal clarity to the economic operators involved in this sector. It should therefore be clarified that parts and components removed from an end-of-life vehicle, which are suitable for [...], remanufacturing [...], should not be considered waste. This is necessary to facilitate the shipment, transportation or any other transfer of such parts and components. The relevant national authorities should be in position to request documentation from the authorized treatment



facility that removed the part or component concerned, that confirms, via a dedicated assessment, the technical suitability of the relevant parts and components for remanufacturing, refurbishment or reuse." [see page 33 (58)] and "The parts and components that are fit for [...], remanufacturing [...] shall not be considered waste. The assessment shall be carried out with particular focus on the technical feasibility of conducting the processes referred to in the first subparagraph and vehicle safety requirements. Documentation confirming the conducted assessment shall be, upon request, made available to the relevant national authorities, including when the parts and components are transported for the purpose of [...], remanufacturing [...]." [see page 66 / Article 31 (d)].

Recommendations R1 APRA Europe recommends that their members fulfill the requirements for the assessment of used parts and to label and declare them for transportation in line with this upcoming EU regulation.

R2 APRA Europe also recommends to their members to document that used automotive components [Cores] intended to be remanufactured are transferred in a business to business relationship [B2B] and will not be reused before remanufacturing [see aaf965 bf6f6699f38c46c79b9d32342f01e79a.pdf (apraeurope.org)].

R3 APRA Europe encourages their members to actively and openly discuss the relevant content of the upcoming ELV-R with their customs officer in charge.

Contact

APRA Europe AISBL Kantersteen 47 1000 Brussels BELGIUM info@apraeurope.org