

1.) Draft practical manuals on extended producer responsibility and financing
UNEP/CHW/CLI_EWG.5/INF/6

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3	To provide incentives for producers / importers through their disposal responsibility, to design more sustainable products, which are easier to repair, recover and recycle;	To provide incentives for producers / importers through their disposal responsibility, to design more sustainable products, which are easier to repair, recover and recycle;	Focus on design for sustainability / design for environment instead of design for repair and recycling.
4	Establish a reporting procedure to gather data on products placed on the market and, once these products reach the end of their life, their collection and treatment in line with the waste hierarchy, specifying material flows as appropriate;	Establish a reporting procedure to gather data on products placed on the market and, once these products reach the end of their life, their collection and treatment in line with the waste hierarchy, specifying material flows as appropriate. Applying the waste hierarchy, life-cycle thinking has to be taken into account.	Applying the waste hierarchy should always take into account life-cycle thinking (as also mentioned in the "Strategic Framework of the Basel Convention 2012 – 2021). Thermal recovery in many cases may lead to higher environmental benefits than material recycling and may support the overall strategy to destroy POPs.
4	Define measurable targets in terms of prevention and minimisation, preparing for re-use, reuse, recycling	Define measurable targets in terms of prevention and minimisation if feasible, e.g. a target for maximum landfill, preparing for re-use, reuse, recycling and/or	Ongoing discussions about the monitoring of recycling targets within the EU show that

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	and/or recovery aimed at meeting quantitative targets laid down in any relevant waste legislation	recovery aimed at meeting quantitative targets laid down in any relevant waste legislation	recycling and recovery targets may be extremely difficult or impossible to measure. Instead of minimum recycling/recovery targets a maximum target for landfill can be an alternative.
4	<p>Ensure that financial contributions into EPR schemes by producers or importers of products put on the market</p> <ul style="list-style-type: none"> - take into account and cover the entire cost of waste management, including segregation at source; separate collection, transport and treatment; adequate information to waste holders; data gathering and reporting; - take into account the revenues (or losses in the context of drops or fluctuations in the commodities market) from the sales of secondary goods and raw materials originating from waste; - are calculated based on the actual cost of the end-of-life management of individual products placed on the market which are covered by the scheme; - support litter prevention and clean-up initiatives. 	<p>Ensure that financial contributions into EPR schemes by producers or importers of products put on the market</p> <ul style="list-style-type: none"> - take into account and cover the entire cost of waste management, including segregation at source; separate collection, transport and treatment; adequate information to waste holders; data gathering and reporting; - take into account the revenues (or losses in the context of drops or fluctuations in the commodities market) from the sales of secondary goods and raw materials originating from waste; - are calculated based on the actual cost of the end-of-life management of individual products placed on the market which are covered by the scheme; - support litter prevention and clean-up initiatives - allow competition between involved stakeholders 	Financial contributions by producers into EPR schemes may also have negative effects due to reduced competition between waste treatment companies. Financial contributions also trigger the potential for misuse.

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		<p>leading to improved services, technologies and efficiency (also considering that ELV treatment provides a profitable business case).</p> <p>- are allocated to waste minimization activities only and are not allowed to be used for other purposes (monitoring is required).</p>	
4	<p>Product take-back requirements: Take-back policies require the producer or retailer to collect the product at the post-consumer stage. This objective can be achieved through recycling and collection targets of the product or materials and through incentives for consumers to bring the used product back to the selling point.</p>	<p>Product take-back requirements: Take-back policies require the producer or retailer to collect the product at the post-consumer stage. This objective can be achieved through recycling and collection targets of the product or materials and through incentives for consumers to bring the used product back to the selling point.</p>	<p>Collection targets cannot be applied for long-living products.</p> <p>Collection targets shall not be applied to products having a positive value at the end of their life.</p>
4	<p>Regulations and performance standards such as minimum recycled content: Standards can be mandatory or applied by industries themselves through voluntary programmes.</p>	<p>Regulations and performance standards such as minimum recycled content: Standards can be mandatory or applied by industries themselves through voluntary programmes if the use of recycled material is not reducing the safety and environmental performance of the product.</p>	<p>Targets for recycled content should take life-cycle thinking into account and should not be applied to complex and long-living products.</p> <p>(A minimum recycled content may be counterproductive as - recycled material may lead to lower environmental performance in the use phase</p>

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			<p>(e.g. higher fuel consumption due to higher weight of recycled material) - it may hinder the introduction of new materials</p> <p>A minimum recycled content requires test methods to differentiate between recycled and virgin material. This differentiation often is impossible.</p>

2.) Fact sheets on specific waste streams
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4	There are three basic categories of EPR instruments: take-back requirements (product take-back); economic instruments (deposit/refund schemes, advance disposal/recycling fees, material taxes, upstream combination tax/subsidy); and performance standards (recycled content standards).	<p>There are three basic categories of EPR instruments: take-back requirements (product take-back); economic instruments (deposit/refund schemes, advance disposal/recycling fees, material taxes, upstream combination tax/subsidy); and performance standards (recycled content standards).</p> <p>Introducing these instruments - product take-back requirements should address all</p>	Take-back requires all involved stakeholders to fulfill their responsibility (e.g. last owner must deliver the product to an authorized treatment facility). Therefore there is a «shared responsibility» of all involved economic actors

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		<p>stakeholders (shared responsibility).</p> <ul style="list-style-type: none"> - economic instruments should not hinder competition between market participants (also considering that ELV treatment provides a profitable business case). - a minimum recycled content should only be introduced on a voluntary basis to allow producers to take effects on the safety and environmental performance of their products into account. 	Targets for recycled content should take life-cycle thinking into account and should not be applied to complex and long-living products.
4	Targets for recycling and quotas for the take-back of products should be set according to the capacity of the recycling market.	Targets for recycling and recovery-quotas for the take-back of products should be set according to the capacity of the recycling market.	ACEA proposes to delete collection targets, as these are extremely difficult to define and measure, especially for long-living products.
5	ESM of wastes requires a regulatory and enforcement infrastructure that ensures compliance with applicable laws, measures and regulations.	No changes proposed.	It should be discussed how developing countries can ensure enforcement of environmental legislation.
13	Other fact sheets in the series provide related information on waste oils, waste lead acid batteries, waste tyres and electrical and electronic waste.	Other fact sheets in the series provide related information on waste oils, waste lead acid batteries, waste tyres and electrical and electronic waste (for electric/electronic parts, which are not part of a vehicle).	The different waste streams should be clearly defined.
13	Technical guidelines have been previously developed under the Basel Convention for the environmentally	Technical guidelines have been previously developed under the Basel Convention for the environmentally	End-of-life vehicles do not contain these substances.

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	sound management of waste pneumatic tyres (1), waste oils (2), waste lead-acid batteries (3), and wastes consisting of, containing or contaminated with PCBs, PCTs or PBBs (4), among others.	sound management of waste pneumatic tyres (1), waste oils (2), and waste lead-acid batteries (3), and wastes consisting of, containing or contaminated with PCBs, PCTs or PBBs (4), among others.	
14	Table 1	Vehicles do not contain mercury switches and asbestos since many years: Airbags should be deployed instead of being dismantled; Electronics should remain in the ELV and be treated via the shredder/post-shredder route.	Adjust table 1 Dismantling of particular parts (such as electronic components) only makes sense if suitable recycling routes and technologies are available and will be used.
16	Removal of asbestos-containing brake shoes or clutches should be done using specially designed, low-pressure spray equipment that wets down brake or clutch dust and properly catches the runoff to reduce asbestos being released into the air.	Removal of asbestos-containing brake shoes or clutches should be done using specially designed, low-pressure spray equipment that wets down brake or clutch dust and properly catches the runoff to reduce asbestos being released into the air.	Vehicles and original spare parts do not contain asbestos.
16	Catalytic converters, metal parts containing copper, aluminium or magnesium, tyres, glass and large plastic components (e.g., bumpers, dashboard) should be removed for recycling in the dismantling stage, if they cannot be segregated in the shredding process in such a way that they can be effectively recycled (5)	Catalytic converters, metal parts containing copper, aluminium or magnesium, tyres, glass and large plastic components (e.g., bumpers, dashboard) and other components with a positive value should be removed for recycling in the dismantling stage, if they cannot be	Catalytic converters and tyres should be removed before shredding. For all other component/parts dismantling only makes sense, if there is a customer

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		segregated in the shredding process in such a way that they can be effectively recycled (5)	(=financial positive recycling path) for these parts.
17	Specific attention should be paid to plastics as these may be contaminated with POPs.	Specific attention should be paid to plastics as these may be contaminated with POPs. Measures have to be carefully selected as the usually very low POP concentrations may not justify extensive and probably unsustainable solutions.	Automotive industry has already started to quantify the impact of POPs in the residual elements of ELVs.: Recent studies in some markets (Ireland and the UK in particular) have provided evidence that in the shredder fluff the amounts of POPs are below the concentration limits which are set by POP Regulations (1000 ppm).
18	In Belgium, for example, the treatment of waste vehicles takes place in network of recognised treatment facilities organised and monitored by a non-profit body, Febelauto, formed by representatives of assemblers, producers, importers, car dealers, suppliers, recyclers and treatment facilities; authorised treatment facilities must comply with the 'Febelauto standards' (24).	In Belgium, for example, the treatment of waste vehicles takes place in network of recognised treatment facilities organised and monitored by a non-profit body, Febelauto, formed by representatives of assemblers, producers, importers, car dealers, suppliers, recyclers and treatment facilities; authorised treatment facilities must comply with the 'Febelauto standards' (24). Effective EPR implementation in general is not necessarily requiring a Producer-Responsibility-	Even if some countries have decided to introduce PROs this does not necessarily have to provide the most suitable and beneficial option. Additional administrative burdens and costs have to be considered carefully vs. potential sustainable benefits.



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		Organisation (PRO). Fulfillment of EPR requirements could be achieved directly and very efficiently by individual producer systems. In all cases, dismantlers and recyclers are generally required to meet legal standards for treatment and handling of products and materials.	Development and enforcement of standards are much more important.