Date: February 2020

Re: Waste Action Plan for a Circular Economy
ELVES' Submission

ELV Environmental Services CLG (ELVES) welcomes the opportunity to be part of the public consultation on the Waste Action Plan for a Circular Economy.

ELVES' submission would like to comment broadly on the overarching areas of sustainability, the circular economy, and climate change. Beyond our targets for reuse, recycling, and recovery, ELVES would consider these areas as relevant to our wider operations, both now and into the long-term future.

While the motor industry is going through a phase of rapid technological development, it remains one of the oldest industries that undertake circular practices. Dismantling and reuse of vehicle components has been a consistent activity since their manufacture. While this is an established practice at Authorised Treatment Facilities (ATFs), ELVES recognises that this could be further formalised under a circular economy. As such, undamaged and reusable parts from End-of-Life Vehicles (ELVs) should be considered as having achieved End-of-Waste and be classified as Green Car Parts, where the benefits of Green Car Parts being quality, affordability, and sustainability. In many countries, they are available from both ATFs and as refurbished components from the vehicle manufacturer.

Electric vehicles are not a new invention, but battery technology has surpassed what the original ELV Directive had envisaged as part of its stringent targets on reuse, recycling, and recovery. The electrification of the car parc in one form or another is an inevitability. So far, ELVES has succeeded in meeting the requirements of the ATFs through its Electric ELVES Programme through the provision of training, technical support, and free collection of industrial batteries for recycling. However, there is much more that can be achieved, as recycling alone cannot meet the targets proscribed in the ELV Regulations.

ELVES has realised that this presents an opportunity for the re-purposing of these industrial batteries as alternative power sources in many applications. Therefore, the reuse and re-purposing from the ATFs has a vital role to play in target attainment, while delivering on the ELV targets and the objectives of the circular economy. The climate change benefits are also apparent. The re-purposing of the industrial battery as a store for wind and solar energy is a proven practice and technology.

Another waste stream from ELVs that will have positive implications for sustainability and climate change is the recovery and reuse of air conditioning gases. With the assistance of stakeholders, ELVES will be able to get ATFs to remove and store these gases. Furthermore, these gases have a commercial value and can directly replace virgin product. ELVES look forward to developing this project.

In conclusion, in accordance with the Waste Framework Directive Amendment, ELVES understands that as an Extended Producer Responsibility Scheme, it should be responsible for meeting the targets for all ELVs presented at ATFs subject to agreement between stakeholders that ensures full compliance for new and used imported vehicles into Ireland. ELVES can continue to expand its Electric ELVES Programme to cover the aftersales sector and a wider range of ELVs.