

Quick Guide - The export of second hand vehicle parts.

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What's this document about?

This document provides information and examples of how to demonstrate that parts removed from End of Life Vehicles (ELVs) are second hand goods and no longer subject to waste controls.

It gives examples of the type of information that should accompany second hand parts that are being exported. This information is key to demonstrate they are not waste and not subject to the transfrontier shipment of waste (TFS) controls.

Who does this apply to?

Environment officers, enforcement officers and others who are regulating the export of waste.

Contact for queries and feedback

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- Please give [anonymous feedback](#) for this document.

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End of Life Vehicles (ELVs), waste and second hand parts

The purpose of this document is to:

- Confirm that whole or part ELVs that are being exported to dismantle them for spare parts are waste.
 - Provide information and examples of how to demonstrate that parts removed from ELVs are second hand goods and no longer subject to waste controls.
 - Give examples of the type of information that should accompany second hand parts that are being exported to demonstrate they are not waste and not subject to TFS controls.
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Why is this important?

Recently there have been a number of occasions where European regulatory authorities have stopped shipments of vehicle parts and engines originating from the UK.

Some of these loads have been deemed waste and are usually repatriated back to the UK. This can be very expensive, time-consuming and frustrating for all parties involved.

End of Life Vehicles

ELVs are waste and the depollution and dismantling of them is a waste treatment activity. The dismantling of ELVs can however, produce a range of second hand parts that can be re-used for their original intended purpose.

Second hand parts

Although the ELV is waste and the dismantling of the ELV is a waste treatment activity, the dismantling process can produce parts that cease to be waste in the following circumstances:

- they are fit for reuse without any further repair; and
- they are certain to be used for their original intended purpose; and
- they are handled and stored in a manner so they are not damaged and can be used for their original intended purpose

Parts removed from an ELV and assessed as undamaged and fit for re-use for their original intended purpose would be considered a second hand part provided they are stored, handled, transported and sold as a second hand good. These parts will not be subject to waste controls.

When parts that are removed from ELVs or vehicles are waste

Parts that are significantly damaged and need anything more than very minor refurbishment or repair are waste until they have been repaired/reconditioned.

We are producing a regulatory position statement to allow the limited repair and reconditioning of vehicle parts without the need for an environmental permit. This covers for example the repairing of body panels that have significant damage, or reconditioning engines and other parts.

Until repaired and fit for re-sale as a second hand part for their original intended purpose these parts remain waste.

Example

- Panels supplied by an ELV site to customers for direct reuse by that customer and merely need simple repainting/respraying to match a particular vehicle are not waste.
 - Extensively damaged panels that cannot be directly reused because they need extensive repair are waste. Examples could include badly split and cracked bumpers that require plastic welding/ filling, badly dented body panels, or engines/ gearboxes which need reconditioning.
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Demonstrating parts removed from ELVs are not waste

Regulatory authorities outside the UK may take a completely different view about whether a part is waste or not. In the EU, member states tend to have similar views, but this is not always the case. If there is any doubt it is worth the exporter checking with that regulatory authority. Where they do have different views, the exporter must comply with their requirements.

In order to avoid problems with vehicles & loads being seized/ impounded/ repatriated (which can be expensive and time consuming) complying with the following points will help exporters and ATFs demonstrate that the materials are second hand goods rather than waste

Engines

- Engines should be assessed to be fully functional and therefore suitable for re-use without repair prior to the ELV being depolluted and the engine being removed.
 - Engines should be fully drained, oil filters removed and bunged prior to storage and/or export to prevent oil leaking.
 - Engines that have not been depolluted and still have an attached oil filter, or leak oil in transit are a pollution risk and carry a significant risk of being detained or repatriated.
 - It is likely engines with significant damage (e.g. hole in the block) or parts missing (sump or cylinder head) will not have been tested and will not be suitable for direct reuse without repair. They are waste.
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Tyres

- Tyres intended for reuse should be assessed as suitable for direct re-use, following The Motor Vehicle Tyres (Safety) Regulations 1994 <http://www.legislation.gov.uk/ukxi/1994/3117/regulation/7/made>
 - Tyres that are not be road legal in the UK are regarded as waste regardless of the whether or not they are road legal in the destination country.
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Other parts

- Other parts which are intended for reuse for their original intended purpose, should be assessed to determine functionality, quality and condition. The key thing is to ensure that they are suitable for re-use without modification or repair.
- The manner in which parts are stored and packed during transportation will also strongly indicate the nature of the part. Parts destined for direct reuse must be packed so damage in transit is avoided.

For example - ELVs which have been cut in half, or have had the roof chopped off are not regarded as a collection of 'used parts'. These are ELVs because although some of the individual parts may be reused, the ELV cannot be used as a vehicle on UK roads. The ELV requires depollution and

dismantling to remove the parts - this is a waste recovery activity. Those parts which are not suitable for reuse are waste.

This ELV is waste and should be exported in accordance with the relevant waste shipment controls.

Records and information that should accompany shipments of parts.

Documents and inventories

All parts exported as parts should be accompanied by detailed documentation/ inventory. This will support the claim that the parts are intended for reuse without further treatment. Listing the items sold is important.

Ideally, as best practice, each of the individual parts should also have an attached label or marking which relates to the list of parts supplied & allows it to be distinguished from all the others

Why? If a buyer also purchase parts from other sites/operators as part of a purchasing round and those other items are, or could be, waste. There is a risk the whole load could be stopped and deemed waste.

If the operator can clearly identify the parts that they have sold and has the paperwork to prove they have been assessed and ceased to be waste, they can demonstrate that they have not committed any TFS or duty of care offences. This may be particularly useful should there be the risk of the load being repatriated and them avoiding liability for any of the costs associated with the repatriation.

Below are some examples of the type of information that should accompany each consignment of parts.

Details of the seller

- Full company/partnership or sole trader name
 - Full company/partnership or sole trader address
 - VAT number
 - ELV (ATF) permit number
 - Telephone number
 - Fax and email details if available
 - Contact name
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Details of the purchaser

- Full company/partnership or sole trader name
 - Full company/partnership or sole trader address
 - Telephone number
 - Fax and email details if available
 - Contact name
 - Regulation Authority reference if applicable
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Details for engines

- Donor vehicle marque
- Engine size

- Fuel type
 - Engine number
 - Price/value of the engine(s)
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Details for gearboxes

- Donor vehicle marque
 - Gearbox type (manual/ auto)
 - Price/value of the gearboxes
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Details for other parts

- Item description (e.g. door panel, wing mirror, rear light, etc)
 - Quantity of each type of part (e.g 6 door panels, 20 wing mirrors etc)
 - Price/value of the items
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Accompanying statement

“All items listed originate from de-registered UK vehicles and are sold as working used parts for reuse only”.

It is advised that there should also be a statement that the parts were tested by a suitably trained person on dd/mm/yyyy and found to be in working order.

The Seller’s company stamp should be signed over by the company’s authorised person and it should be dated.

Related documents

Links

Further information and guidance on the international shipment of waste can be found:

<https://www.gov.uk/guidance/importing-and-exporting-waste>

<http://ec.europa.eu/environment/waste/shipments/guidance.htm>

[ELV GUIDE](#)