



Beryllium Science & Technology Association

Brussels, 30 October 2018

BeST feedback to the evaluation roadmap on the ELV Directive

BeST

Beryllium Science & Technology Association – represents the suppliers of beryllium metal and beryllium containing alloys in the EU market and has the objective of promoting sound policies, regulations, science and actions related to the use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications. It is also the objective of BeST to promote good practices in the workplace, in order to protect workers handling beryllium containing materials.

Introduction

The European Commission has published its evaluation roadmap in view of the upcoming review of the Directive 2000/53/EC on end-of-life vehicles (ELV Directive). Indeed, by 31 December 2020, the European Commission shall evaluate the directive and report on its results to the European Parliament and to the Council as well as submit a legislative proposal if deemed necessary.

Our concerns

Without prejudice to BeST's active participation in the envisaged future public and targeted consultations as scheduled in the roadmap, BeST already raises the following general concerns in the frame of the current public feedback:

- There is general lack of coordination and synergy among EU legislation which creates legal uncertainty and undermines the competitive development of the EU Industry.
- The lack of coherence in EU initiatives and policies translates into overregulation – The ELV Directive should avoid duplicating other EU frameworks such as REACH, RoHS, OSH Legislation, Carcinogens and Mutagens Directive (CMD), Waste Framework Directive (WFD), Circular Economy Package, and the Raw Materials Strategy.
- The reduction of the use of hazardous substances in vehicles should be dictated by a risk-based approach and not by the hazard classification of the material. The Industry has proactively adopted environmental, customer and worker friendly solutions and these must be considered when assessing the need to reduce the use of a hazardous substance in vehicles under the ELV Directive.
- The introduction of ELV targets per material is undesirable as it will negatively affect the image of the substance on the market and arbitrarily force downstream users to substitute a material that produces the best results to reach the desired requirements, leading to performance losses. The automobile sector uses many parts containing copper beryllium alloy, which is the best available material for demanding electrical and electronic systems that are of crucial importance for the reliability and safety of vehicles. For example, Anti-lock brake systems, Engine control systems, Transmission systems, and Radar and Infrared sensors.
- Specific treatment should be reserved to metals and alloys as inorganic substances trapped in a matrix and not bioavailable. Beryllium is mainly used as an alloying element in a copper matrix (2% max.). The risk is limited to the workplace through inhalation during certain operations that generate airborne particles and the implementation of good practices and Occupational Exposure Limits provides protection to workers in all sectors, including recycling.
- Special attention should be given to Critical Raw Materials as key enablers of the transition towards to a low-carbon economy. Copper beryllium alloys are essential for the development of reliable electric/hybrid cars. Beryllium is also necessary as an additive for the recycling of light metals used to reduce the weight of vehicles and improve energy efficiency.
- The ELV Directive's impact on the global trade of vehicles should be taken into consideration.

We urge you to take our concerns into account and we remain at your disposal to discuss the above-points and for any further assistance.

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