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CLEPA Statement on the applicability of ELV vs RoHS / WEEE in the automotive industry

Legal basics

End of life vehicle directive 2000/53/EC (ELV)

ELV applies to vehicles, including components and materials of vehicles, as defined in article 3(1). ELV focuses on the recycling of vehicles, put on the European market. In addition to that, it restricts the use of specific substances in vehicles.

Waste electrical and electronic equipment directive 2012/19/EU (WEEE)

As of 15th of August 2018, WEEE applies to electrical / electronic equipment (EEE), as defined in article 2(1). It further excludes specific EEE for the means of transport (article 2(4)). This exclusion concerns vehicles, which are in scope of ELV.

WEEE focuses on the recycling of EEE placed on the European market.

Restriction of the use of certain hazardous substances in electrical and electronic equipment directive 2011/65/EU (RoHS)

RoHS applies to EEE, as defined in article 2(1). It further excludes specific EEE for the means of transport (article 2(f)). This excludes vehicles, which are in scope of ELV.

RoHS focuses on the restriction of the use of specific substances in EEE, placed on the European market.

Scope of this paper

WEEE directive opens its scope by 15th of August 2018. As a consequence, the directive covers further EEE, which were not in scope before. Exemplary examples of EEE new in scope include, but are not limited to clothes and furniture with installed electrical / electronic function such as:

- Bathroom cabinets with installed illumination
- Desks, which are adjustable by height through electrical function
- Shoes with installed blinking lights.

This position paper shall help companies to define, which directives apply to their parts, either ELV directive or RoHS / WEEE directive.

Applicability for vehicle parts containing EEE (non-exhaustive examples)

Systems or parts, which are specifically designed for the vehicle and which are essential for the safe function of a vehicle → ELV directive applies:

- Electrical wipers
- Vehicle keys
- Automotive lighting systems
- Tire pressure monitoring systems.

Installed assistance or entertainment systems or parts, which are specifically designed for the vehicle → ELV directive applies:

- Vehicle multimedia systems
- Installed navigation systems
- Electric window systems.



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Mobile assistance systems or parts, which could also fulfill a non-automotive function → WEEE / RoHS directive applies:

- Mobile navigation systems
- Warning triangles with blinking function
- Mobile cellphone chargers.

Support of JAPIA organization

This statement is supported by JAPIA, the “Japan Autoparts Industry Organization”.

CLEPA is the European Association of Automotive Suppliers. Over 120 of the world's most prominent suppliers for car parts, systems and modules and 23 National trade associations and European sector associations are members of CLEPA, representing more than 3000 companies and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognised as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc.).

- Some **12 million** people are employed in the European automotive industry
- European automotive suppliers directly employ 5 million people
- European automotive suppliers invest over **€22bn** in RDI per year. They are the biggest private investor into research and innovation
- Per year, **18 million** vehicles are manufactured in Europe, contributing to the stability and growth of the European economy