

BeST comments on end-of-life vehicles

Introduction

The European Commission has recently published its proposal to review the end-of-life vehicles directive.

BeST's comments

Considering the above, BeST submits the following observations on the proposal:

- **Risk instead of hazard**

The raw materials used to produce innovative, efficient, and high-tech vehicles feature unique and unmatched properties which make them the best suited materials to achieve the desired performance and longevity of the product. When considering regulatory measures applicable to these materials, a risk-based approach is the efficient streaming tool to use where both hazard and exposure are considered: Risk = Hazard x Exposure. On the contrary, the use of a hazard-based approach would jeopardise the performance of the products by promoting the phasing out of materials that are used safely based solely on their hazardous classification.

- **Understanding the link between raw materials and the performance of products**

When introducing regulatory measures impacting the use of raw materials in specific product categories, a clear understanding of the properties of these materials and their contribution to the performance and longevity of the products that contain them is of vital importance. Indeed, in absence of this, regulatory measures will produce unintended and regrettable consequences with potential substitution of materials with less-performing materials and higher negative environmental impact.

As an example, the addition of beryllium at 2% maximum in copper considerably increases the performances and durability of copper as conductive material. Connectors in copper-beryllium are essential in life safety applications like airbag occupant-restraint systems and anti-lock brake systems.

- **Avoiding a 'one-size fits all' approach for recycling requirements**

Requirements on recyclability and post-consumer recycled content cannot be applied to all commodities and/or products such as in automobiles indistinctively. Indeed, these need to be tailored to the specific characteristics of the commodity targeted to achieve the desired impact and avoid unintended and regrettable consequences.

In the case of beryllium where very small amounts of the material are present in end-applications, mostly as alloying element in copper, recovering and recycling actions are not technically nor economically feasible. On the other hand, beryllium added at very low concentration has a key role in allowing the recycling of other raw materials like magnesium-containing alloys.

- **Supporting industry**

The regulatory frameworks put in place should avoid overburdening industry. Non-regulatory measures should therefore be preferred. Only when this is not possible, regulatory measures that are consistent and coordinated should be implemented.

For example, it is important that the definition of substances of concern remains consistent across EU legislation. This definition should derive from REACH and its associated guidance documents. This will guarantee a consistent regulatory environment and legal certainty for industry.

Conclusions

BeST encourages EU policymakers to coordinate and develop regulatory and non-regulatory frameworks able to secure the raw materials necessary for all relevant industrial sectors, including vehicles, to allow the EU to remain competitive at international level while guaranteeing EU societal well-being.



Beryllium Science & Technology Association

About BeST

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe 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 to protect workers handling beryllium containing materials.