

## **Concerning Recyclability of Automotive Vehicles**

The Russian Federation pursues a purposeful policy of reduction of environmental pollution and protection of the market against poor-quality and environment-unfriendly products of automotive industry. In the Russian Federation, the problem of recyclability of motor vehicles is especially important owing to the old age of motor vehicle fleet. This problem should have the complex solution and should include provisions for the both: development of the automotive vehicles designed in a view of recyclability requirements, and creation of the industry on “end-of-life vehicles” recycling and their waste products.

The draft Technical Regulation «Concerning Requirements to End-of-Life Vehicles Providing their Safe Recycling» was worked out for the solution of a question of “end-of-life vehicles” recycling. This draft was developed in the Customs Union (comprising the Russian Federation, the Republic of Belarus and the Republic of Kazakhstan). This draft includes requirements to vehicles and to the sector of “end-of-life vehicles” recycling.

Since September 1, 2012 recyclability fees are raised for the vehicles imported to the customs territory of the Russian Federation. Those fees are also considered as a part of the state policy providing for vehicle recycling.

The importance of the proposed draft UN Regulation concerning recyclability of automotive vehicles is beyond any doubt. However, to our opinion, the proposed draft needs some improvement.

1. According to the proposed draft, its scope includes only vehicles of M1 and N1 categories, and also new components. However the requirements to the components are not defined (except for restriction of their reuse on new vehicles). It is necessary to provide for a possibility of extension of requirements to other vehicle categories. A reuse of the components which are able to reduce vehicle safety is also an important issue.
2. In the proposed draft there is no list of the technical documentation to be provided by the manufacturer concerning technology of vehicle dismantling and recycling; the forms of technical documentation are neither included. The IDIS system applied in the EU is not standardized at ISO level.
3. According to the proposed draft, calculation of vehicle recyclability and recoverability rates is allowed to be made taking into account the technologies of recycling, which have passed only laboratory check. In a view of a difference in technical and technological level of vehicle recycling industry in different countries, reaching identical recyclability and recoverability rates may not be possible. This may limit a possibility of mutual recognition of the communications on the type approval pursuant to this Regulation.
4. In the proposed draft there is no requirement for prohibition of use of ecologically dangerous materials as in the Annex II to Directive 2000/53/EU.
5. According to the proposed draft marking of plastic and rubber components is not obligatory; the list of the ISO standards for marking provided in the draft only. As a subsequence, that could complicate recycling of such components.
6. The Russian version of the proposed draft needs considerable correction, especially concerning terminology.

**Conclusions:**

The importance of the proposed draft UN Regulation concerning recyclability of automotive vehicles is beyond any doubt. However, the proposed draft needs some improvement.

It is proposed to organize an informal working group for completion of this draft. The Russian Federation experts are ready to take part in its activities.

---