

# Annual Report

2024

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liability or responsibility for any errors or omissions in the content.

Authors: ELVES, 2025

Acronyms and abbreviations: AER Annual Environmental Return

ATF Authorised Treatment Facility
CoD Certificate of Destruction

DECC Department of Environment, Climate, and Communications

DoT Department of Transport
EC European Commission
ELV End-of-Life Vehicle

ELVES ELV Environmental Services CLG

EO Economic Operator

EPA Environmental Protection Agency
EU/C European Union/Commission

EV Electric Vehicle

EVB Electric Vehicle Battery

M1 Vehicles designed and constructed for the carriage of

passengers and comprising no more than eight seats in addition to the driver's seat, and having a maximum mass ("technically permissible maximum laden mass") not exceeding 3.5 tons

MAC Mobile Air Conditioning

N1 Vehicles for the carriage of goods and having a maximum mass

not exceeding 3.5 tonnes

NWCPO National Waste Collection Permit Office

OEM Original Equipment Manufacturer = Vehicle Manufacturer

PRO Producer Responsibility Organisation

PST Post Shredder Technology

WERLA Waste Enforcement Regional Lead Authority

Enquiries & feedback to: info@elves.ie

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# 1 Foreword

Dear Stakeholders,

As we reflect on the past year, I am pleased to present the Annual Report for ELVES, the Producer Responsibility Organisation (PRO) dedicated to the sustainable and responsible management of end-of-life vehicles (ELVs). This year has been one of both consolidation in re-approval and progress in legislation, strategic innovation in our service offerings to our Network, and a reinforced commitment to circular economy principles.

With the automotive industry evolving rapidly alongside the new Batteries Regulation and the anticipated ELV Regulations in 2025, our role as a PRO has never been more crucial. In collaboration with manufacturers, dismantlers, recyclers, and regulatory authorities, we have worked to ensure that vehicles reaching the end of their life are managed in an environmentally sound, economically viable, and socially responsible manner.

I am proud to report that we expect to achieve national reuse, recycling, and recovery rate of 95%, surpassing the minimum regulatory targets and reflecting the effectiveness of our ATF Network. Our resourcing of the real-time data systems has strengthened transparency across the waste management sector, helping to increase reuse of parts and the circularity of components and materials thereby enhancing producer accountability.

Moreover, this year saw the continuing success our Electric ELVES programme and the completion of our Electric Loops project, both aimed squarely at an electric future for all our stakeholders. We also deepened our engagement with European and national policymakers and other PROs to align with upcoming changes concerning electric vehicle batteries and ELVs.

Our progress is only possible because of the continued trust and cooperation of our members, ATF Network, and industry stakeholders. I extend my gratitude to our team, whose expertise and commitment drive our impact daily. Looking ahead, we support a circular economy and as vehicle design, material use, and ownership models continue to shift, so too will our strategies to ensure the end-of-life phase is not an afterthought, but an opportunity.

Thank you for being part of this essential journey.

Fiacra Quinn, CEO.

# 2 About Us

ELVES (ELV Environmental Services CLG) has been operating as the collective compliance scheme for the motor industry under the ELV Regulations since 2017. ELVES is a private not for profit company funded by its members, who are mostly professional importers of new M1 & N1 vehicles. ELVES operations are approved by the Minister for the Environment, Climate, and Communications. ELVES activities focus on:

- Providing information to the public about why, how, and where to scrap a car,
- Supporting our ATF Network (for reuse and recycling) which takes back the ELVs and starts the recycling process, and
- In addition to our Network, we are supporting our reprocessors (for recycling and recovery), namely shredders and PST installations who are continuing the recycling process and ensure the environmentally friendly disposal.

A key focus for ELVES is ensuring that our national collection system, the ATF Network, achieves the minimum targets of 85% reuse and recycling and 95% overall when other recovery is included as set out in the ELV Regulations. ELVES is led and overseen by a Board of non-executive directors, consisting of representatives from the motor sector and independents. Our Board collectively ensure delivery of the organisation's objectives, set strategic direction, and uphold best corporate governance.

Board, 2024 YE	Affiliation	Meeting Attendance		
Alan Nolan (R), since 2017	Independent (former CEO SIMI)	5/6		
Anja Köckritz (R), since 2017	Independent (former Opel/GM)	6/6		
Brian Cooke (A, R), since 2017	SIMI	6/6		
Ciaran Kinahan (E), since 2017	MDL	5/6		
Colin Griffin (A), since 2017	GMDL	5/6		
Fiacra Quinn (executive)	ELVES	6/6		
Ken Ward, since 2020	Nissan	4/6		
Irene Collins (A), since 2017	Independent (former food industry, EQA)	6/6		
Karen Mahon (Chair, E), since 2017	Independent (Environmental Scientist)	5/6		

Committees: Audit (A), Remuneration & Succession (R), ESG (E)

The Board is open, responsive, and accountable to its users, beneficiaries, members, and others with an interest in its work. There are internal committees on nomination, remuneration, and auditing, not only to safeguard ELVES' activities and reputation, but also to recognise achievements. The company secretary is Maples Secretaries Ltd, the auditors are Clinton Higgins Ltd, and the solicitors are LK Shields Solicitors. The AGM was held in August and a wider Stakeholder meeting in October, where representatives of vehicle manufacturers from across Europe are invited to attend. Regular communications about the work programme and key developments were dispatched throughout the year.

# **Funding and Expenditure**

Funding of ELVES is paid by *Producers* at a rate of €20 per vehicle. Income in 2024 was €2,440,143 and expenditure in 2024 was €2,445,147. In accordance with the original approval from the Minister of the day a contingency fund was held at €1.7 million and are placed in a separate account. In June 2024, the Minister of the Department reapproved ELVES to act as a compliance scheme for end-of-life vehicles until July 2029 with a condition being that the continency reserve fund be increased to €2.18 million.

#### **Cost Minimisation**

ELVES is a small organisation and by its nature, costs are kept to a minimum, especially in relation to administration costs. In addition, the organisation continually keeps cost minimisation as a focus when delivering on its activities, seeking out the most cost-efficient way of delivering on a certain activity or core obligation. ELVES is aware that its costs are likely to increase in the future, given the requirements of the incoming EU end-of-life vehicles' regulations. ELVES continues to monitor these costs to ensure best value for money, but also to ensure our continued ability to meet the reuse, recycling, and recovery targets.

# 3 Statistical Report 2024

# **Supply by Year**

M1	2024	2023	2022	
New imports M1	121,230	122,444	105,398	
Used imports M1	61,583	50,716	46,490	
N1	2024	2023	2022	
New imports N1	30,751	28,810	23,510	
Used imports N1	9,209	7,536	6,335	
Total	2024	2023	2022	
New imports M1, N1	151,981	151,254	128,908	
Used imports M1, N1	70,792	58,252	52,825	

https://stats.beepbeep.ie/, 29th June 2025

# **Vehicle Membership**

OEMs/ VMs/ Distributors	Marque
BMW Automotive (Ireland) Ltd	BMW, MINI, Rolls-Royce
Gowan Auto	Alfa Romeo, Chrysler, Fiat, Jeep, Opel, Peugeot, Citroën, DS, Chevrolet, Honda
Henry Ford & Son Ltd	Ford
Hyundai Cars Ireland	Hyundai
I.M. Automotive Ltd	Subaru, GWM
Kia Motors Ireland	Kia
Mazda Motors Ireland Ltd	Mazda
MMC Commercials	Mitsubishi, MG
Motor Distributors Ltd	Maybach, Mercedes, BYD
Nissan Ireland Ltd	Nissan
OHM Group	Jaguar, Land Rover, MAN
Renault Ireland Ltd	Dacia, Renault
Suzuki Cars (Ireland) Ltd	Suzuki
Toyota Ireland	Lexus, Toyota
Volkswagen Group Ireland Ltd	Audi, Cupra, Seat, Škoda, Volkswagen
Volvo Cars Ireland Ltd	Volvo
Polestar Automotive Ireland Ltd	Polestar
Porsche Centre Dublin	Porsche
KGM Ireland	Ex-Ssangyong
Tesla Motors Ireland Ltd	Tesla
Isuzu Ireland	Isuzu
Harris Automotive Distributors	LDV, Maxus
Setanta Vehicle Sales Ltd	Renault Trucks
Emerald/ NI	Iveco

 $\underline{\text{https://www.simi.ie/en/motorstats/national-vehicle-statistics}}$ 

Used Imports	M1 & N1
Number of Vehicles	7,800 (~10%)
Number of Members by Company	101

101 shows the number of members by registered company. It does not reflect the number of retail companies covered. All members are detailed on the website (www.elves.ie).

## **ATF Network & Targets**

The ELVES ATF Network has met the targets of 85% reuse/recycling and 95% recycling/recovery as specified in the Waste Management (End-of-Life Vehicles) Regulations 2006, S.I. No. 282 of 2006 as amended 2014 and 2016, since its inception in 2017, with national targets of 85% reuse/recycling and 95% recycling/recovery as specified in the Waste Management (End-of-Life Vehicles) Regulations 2006, S.I. No. 282 of 2006 amended 2014 and 2016, met from 2018 to-date. For 2023, the ELVES ATF Network met and exceeded both the 85% reuse and recycling and the 95% reuse and recovery target. As a result of ELVES funding of Post Shredder Technology (PST), we are confident of meeting both targets also in 2024, nationally, but are awaiting confirmation by the EPA. This has been achieved despite the large percentage of used car importers (90%) who are not compliant and have not financially contributed to the waste they have created as *Producers* (<a href="https://stats.beepbeep.ie/">https://stats.beepbeep.ie/</a>, 29th June 2025, as above). The vehicles imported arise as End of Life Vehicles (ELVs) within Ireland and the achievement of reuse, recycling and recovery targets on them is supported by the contribution made by compliant importers. Thus, compliant importers are currently covering the costs of a significant number of free riders, non-compliant used importers.

Year	2024	2023	
Compliance (% age by units):			
- New:	100%	100%	
- Used:	11%	11%	
ATF Network:			
- ATFs:	66	69	
- ELVs (at shredder):	not available yet	58,693	
- CoDs (in Network):	78%	82%	
CoDs:			
- On-line:	95.9%	95.3%	

Year	2024*	2023#		
Targets (2020):				
- Reuse & Recycling:	>85%	87.8%		
- Including Recovery:	>95%	95.7%		

<sup>\*</sup> Not verified by Environmental Protection Agency at time of submission.

The total number of ATFs in Ireland is 199 (<a href="https://facilityregister.nwcpo.ie/">https://facilityregister.nwcpo.ie/</a> May 2025). The ELVES Network is comprised of 66 ATFs and accounted for more than 78% of all Certificates of Destruction (CoDs) issued in 2024. However, ELVES measures target against total ELVs arising, not CoDs. ATFs cannot meet targets on their own and rely on ELVES to pay for further processing of Auto Shredder Residue (ASR) using post

<sup>#</sup> Only available after the date of submission.

shredder technology (PST). ELVES financially support these PST operations and thereby ensure that targets are met, for the ATF Network and nationally.

ATFs applying to join our network are generally accepted, provided they have all necessary authorisations from local authorities and are using the electronic CoD system.

ELVES was in regular contact with ATFs in its Network, by email, by phone, and in person through site and compliance assistance visits. The ATF Network received 17 group mails from ELVES and 15 sites received a Compliance Assistance Visit.

#### **ATF Network Conference**

In June 2024, ELVES held a conference for ATFs in its network in Athlone. The morning was well attended by ATFs in the Network and included sessions on:

- Batteries Regulation,
- ELV Regulation Proposal,
- Electric Loops, and
- Reducing Fire Risk.

Presentations were made by ELVES, representatives from the DECC, and a Fire Safety Officer.

#### **ATF Network Survey**

In late 2024 ELVES undertook a survey of its network. The survey asked ATFs questions on the supports they would find most useful, on EV preparedness and on the results of the Electric Loops project. The results of the survey will be used to guide ELVES' future activities.

# 4 Stakeholder Engagement, Education and Awareness

## **Membership Engagement**

In 2024, three group email updates were sent out to vehicle manufacturer representatives. These are general updates to marque representatives and sit alongside day-to-day contact on individual issues such as statistical reporting and EV battery compliance. In October 2024, ELVES held its annual stakeholder meeting in Dublin where an update on its activities were provided and general discussion encouraged.

## **PRO Engagement**

Nationally, ELVES has engaged with the other Producer Responsibility Organisations (PROs) in Ireland, particularly WEEE Ireland. This most notably concerns industrial batteries and preparations for the new EU Batteries Regulations. In 2024, ELVES was invited to a meeting with the NCT/ Applus to discuss applying a PRO fee upon registration of used imported vehicles.

ELVES continued to participate in meetings of ELV PROs from across Europe to discuss issues of relevance to the operation of PROs in the ELV sector. In 2024, the meetings had a strong focus on the proposal for a new ELV Regulation and in June a joint 'manifesto' in the ELV Regulation proposal was presented to the Commission by the group.

## EU, Industry, Regulator & LA engagement

#### **ELV Steering Group**

The DECC established a steering group on the proposal for a draft ELV Regulation. This included representatives from ELVES, SIMI, ATFs and Metal Shredders, plus a number of government departments. ELVES has actively engaged in these meetings, regularly providing feedback to the DECC on Regulation developments.

#### Site Visits for DECC & EPA

Two site visits were organised by ELVES:

- A study tour to the Galloo shredder and PST facility in Belgium with the DECC and EPA, and
- Organised visit for the DECC to Oran Metal Shredder and PST facility (Galway & Limerick).

#### **Other Industry Events**

In 2024, ELVES attended the following events:

- International Automobile Recycling Congress in Belgium, attended by PROs, vehicle manufacturers, recyclers, policy makers, and representatives of the European Commission, and
- Presented the Electric Loops project at the ATF Pro conference in the UK in May.

ELVES also supports and participates with/ in:

- The EPA regarding data collection and calculation of the ELV targets,
- The Batteries Europe Partnership Association (BEPA),
- Ongoing EPA, DECC, and EU feedback consultations,
- The Zero Emissions Vehicle Initiative (ZEVI), participating in workshops in Dublin,

- The Waste Advisory Group (DECC),
- The Industry Contact Group to the National Waste Enforcement Steering Committee, and
- The Critical Raw Materials Subgroup (subgroup of the Waste Advisory Group)

#### **Email updates to Authorities Email Group**

To aid communication and information sharing on its activities, ELVES sent out regular updates on specific activities it undertook throughout the year to an email group of staff at the DECC, DoT, EPA, Local Authorities, WERLAs and other public agencies. Four of these email updates were sent out in 2024.

#### **Supporting Enforcement through Compliance Assistance**

ELVES through its activities aims to support compliance by both producers (importers of new and used vehicles) and ATFs in its network.

In 2024 ELVES employed a Local Authority Liaison Officer to provide a single point of contact for WERLA and local authority interactions. In September 2024, an initial meeting was held with the WERLAS, shortly after the scheme received re-approval, with agreement to meet on a biannual basis thereafter. Since our inception in 2014 and approval in 2018, ELVES has pledged funds every year that were available to the WERLAS for enforcement.

Since 2014, ELVES raised awareness amongst potentially obligated producers concerning their obligations under the ELV Regulations, work that was reinforced by advertising in industry publications, radio, social media, and in the region of 200 site visits targeted at importers of used vehicles. However, the level of compliance has languished at about 10% of the used vehicles imported. Additionally, there has only been one court case taken against importers since the introduction of the Regulation in 2006, the results of which have not been made public, but it proved costly and time-consuming for LAs and ELVES without delivering the desired outcomes. This difficulty was recognised early on with the Tyre Regulations and hence a system of collecting PRO compliance fees was implemented through the NCT/ Applus which would be similarly efficient for ELVES if introduced in the same manner.

The lack of used vehicle *Producer* compliance is not tenable with the imminent introduction of the new ELV Regulation and the implementation of the Batteries Regulation (as many Japanese imports are electrified). At the end of 2024 it was becoming clear that a new draft of the ELV Regulation may well include text that would support Members States to allow nominated agencies to collect the PRO fee upon registration of a used vehicle. As such, ELVES are asking the NCT/ Applus to collect the fee. Getting this across the line may address the compliance issue and save LA enforcement personnel significant time and resources, while generating funds that can be given to the authorities for waste enforcement at illegal ATFs. An outcome of this discussion is uncertain at this point in time.

For permitted ATFs in its Network, ELVES plays a strong compliance assistance role through the provision of information and guidance, annual reviews of reporting data and specific compliance assistance site visits. Each year an annual review of ELV reporting data is undertaken for every ATF in the Network to ensure correctness and completeness of data put into target calculations. This process takes a number of months from the point where ELVES receives the data from the NWCPO AER system to the time at which final data is submitted to the EPA, normally in October each year. In addition, in 2024 15 compliance assistance visits were undertaken. ELVES role sits at the base on the enforcement pyramid, aiding ATFs in their compliance with the ELV Regulation.

A strong, effective enforcement regime is essential to ensure high levels of compliance and target achievement. The WERLAs are responsible for co-ordinating waste enforcement actions within regions,

setting priorities and common objectives for waste enforcement, ensuring consistent enforcement of waste legislation across the three existing waste management planning regions.

Total spend on enforcement support in the direction of ATFs and used vehicle importers in 2024 is estimated at approx. €78,000.

#### **Education and Awareness**

ELVES activities aimed at increasing awareness of the correct way to scrap a vehicle, promotion of its ATF Network and raising awareness around vehicle importer obligations continued in 2024.

Promotion on social media streams continued with competitions and promotion of key messages, as did our production of flyers 'Has your old car or van reached the end of the road' for inclusion in Motor Tax Renewal reminders. ELVES activities were featured prominently in industry publications such as Autobiz, Autotrade and ATF Professional. ELVES also made use of the reach of local newspapers and their social networks featuring a question and answer-based advertorial 'Have you ever scrapped a car? Would you know what to do or where to go?'. Awareness occurs across the following areas:

- Advertising radio, print, online, Google Adwords NCT centres,
- Press releases on ELVES activities,
- Social Media,
- Merchandise,
- Website/ logo/ branding/ design,
- Conference & Network Events, and
- DoT Leaflet with motor tax.

#### Key highlights in 2024 were:

- Media stories on ELVES activities including our EV Dismantling training, the provision of EV PPE kits to ATFs in the Network and the results of our Electric Loops project,
- Radio ads throughout the year across Dublin and wider region, Limerick, Galway and Cork, and
- In 2024, in addition to a strong radio presence, ELVES reached out to new audiences through a competition run in conjunction with Women's Way Magazine and contributing to the Sustainable Ireland supplement in the Irish Times.

Total spend on awareness raising, education and communications activities in 2024 was €223,426.

# 5 Additional Projects to support ELV Recycling

#### **Electric ELVES**

Electric ELVES is the programme for industrial batteries from hybrid and electric vehicles in Ireland. It was originally a voluntary initiative set up by ELVES in 2018 and is the only programme offering these services to ATFs free of charge. Information on its operation has been sent to ATFs, OEMs, Distributors, and dealerships. The Electric ELVES programme provides support to these undertakings should they receive an EV battery that needs collection and since 2019 has also offered ATF training. The programme is available to all ATFs, not just those in the ELVES Network. It also covers those EV batteries arising in the aftersales sectors. With the support of the Vehicle Manufacturers, the programme provides a variety of supports to ATFs in the handling of these vehicles including:

- Hybrid and electric vehicle awareness training,
- Information on safe battery removal via the International Dismantling Information System,
- Additional manufacturer support in the event of a damaged EV battery, and
- Free collection and recycling of EV batteries, if required.

As a voluntary initiative of ELVES, the Electric ELVES programme is open to all ATFs in the country and as such letters and applications were sent by post to all regarding training and the supports provided by the programme.

At the end of 2024, the training programme has delivered:

- 3 levels of Certified training,
- Across 13 locations,
- 227 people trained,
- 91 ATFs with trained staff,
- 1,400+ hours of training delivered,

In 2024, ELVES delivered two rounds of EV Dismantling training to ATFs at venues in Dundalk, Dublin, Naas and Waterford. 43 people undertook a day's training over 6 days of training. In addition, 20 ATFs in the Network received an EV Safety kit from ELVES in 2024. The kit included PPE (lineman's gloves, face shield, insulated boots), a multimeter, safety hook, insulated tools and signage.

There is a dedicated Electric ELVES resource centre (www.ElectricELVES.ie).

## **Electric Loops Project**

Started in 2023, the Electric Loops project funded by the EPA's Green Enterprise Fund was completed in 2024. The project investigated the reuse, remanufacturing, and recycling potential of electric vehicles, in support of a future circular economy. When surveyed, most of the AFTs found or will find the results of the project useful, especially the component and material value of the parts. Further information on this project can be found in the Circular Economy section of this report.

# **MAC Training and Equipment Support**

Over the last few years ELVES has been working to support ATF compliance in AC gas removal from ELVs. Starting with supporting the development of EPA guidance in 2021, this initiative has widened to include training and support for the latest equipment.

In 2024, 3 ATFs staff were financially supported in getting the Mobile Air Conditioning (MAC) certification, bringing the total supported in getting the qualification to 55.

In addition, ELVES provided funding support to ATFs in its Network to buy AC gas removal equipment. This support was provided to 13 ATFs in the Network.

# 6 ELVES & The Circular Economy

ELVES is fully supportive of Ireland's transition to a circular economy and supporting the maintenance and improvement in the circular characteristics of the ELV Sector. As part of its work and where possible given its mandate, ELVES looks for opportunities where it can play a role.

# Legalisation

In July 2023, the EC published its <u>Proposal for a Regulation on circularity requirements for vehicle design and on management of end-of-life vehicles [COM(2023)451]</u>. ELVES welcomes the EC's proposal to revise the ELV Directive into a Regulation, merging it with the type approval of vehicles for reusability, recyclability, and recoverability (3R type-approval Directive). This proposal notably incorporates a life-cycle approach, establishing requirements for both the end-of-life treatment and the initial design and circular material use of vehicles. ELVES is actively engaged in feeding back on the proposed Regulation via the DECC's ELV Steering Group and the European ELV Stakeholder Forum.

## **Research & Development**

#### **Electric Loops**

In 2023, ELVES had been awarded Green Enterprise funding from the EPA for 'Electric Loops'. The EPA Green Enterprise programme is a Government of Ireland initiative funded by the DECC. Throughout 2023, this project investigated the reuse and recycling potential of electric vehicles as a Circular Economy initiative. The Electric Loops project started in February 2023 and ran all through 2024. Under the Electric Loops project, two popular full electric vehicles were dismantled and their component parts evaluated to determine their value for reuse and recycling, thereby helping to create a future circular economy. The project has helped ATFs and metal recyclers in identifying reuse and recycling avenues for EV parts. In November 2024 the project was shortlisted for an ATF Pro award in the Innovation Category. Results from the project – an ATF Data Matrix and accompanying report were published in April 2024 and can be downloaded from the website. www.elves.ie/en/electricloops

#### Repurposing

It is anticipated that in time there will be the opportunity to send some waste Electric Vehicle Batteries (EVBs) for preparation for reuse or preparation for repurposing. This has the potential to extend the lifespan of EVBs with the associated environmental benefits. While ELVES began with funding a commercial organisation as part of our R&D, opportunities for preparation for reuse/ repurposing that are compliant with the Batteries Regulation are not expected to be available immediately for a number of reasons, namely the secondary legislation needed to support repurposing and reuse are not yet in place. In addition, any Economic Operator (EO - the commercial organisation) repurposing waste EVBs will be required to hold a Waste Facility Permit, with the planning and financial costs that this entails. The EO will also need to have the systems and processes in place to take the waste EVB through a Conformity Assessment process and comply with any other manufacturer obligations.

## **Reuse of Parts**

ELVES and its Network of ATFs continues to support the reuse of car parts and continuous promotion of this important activity via our social media channels and website.

ELVES has been counting the reuse of parts since 2017 and the latest data (2023) of the top 15 parts by quantity are shown in the table below, by unit. Any anomalies in the unit reflect a change in the assignation of the part throughout the years when counted.

Part Reused, by Year	2017	2018	2019	2020	2021	2022	2023
Engines	4,251	5,292	7,578	4,962	9,424	7,813	6,703
Tyre	2,195	650	722	4,586	8,394	6,836	9,686
Strut/ Shock	5,864	6,439	7,650	4,658	5,807	4,470	4,837
Door	3,256	4,054	8,830	3,786	4,647	4,398	5,314
Alloys	2,523	3,619	7,877	6,159	4,614	3,651	2,653
Lights - Headlights	2,534	3,550	5,674	3,921	4,588	4,779	5,308
Lights - Rear & Taillights	5,141	4,687	7,182	5,034	4,542	4,261	4,456
Mirrors	4,261	4,743	6,779	4,584	4,487	5,059	4,058
Brake Callipers	2,890	4,322	5,969	3,102	4,373	2,990	2,324
Injectors	1,412	2,470	4,751	2,829	4,157	3,333	2,562
Switches	2,507	3,165	3,859	3,672	4,125	3,379	2,955
Gear boxes	3,093	4,288	5,758	3,337	3,996	3,979	3,934
Alternators	4,119	4,224	5,674	3,082	3,790	3,201	2,929
Starter motor	3,447	4,014	6,087	2,403	3,554	3,518	2,956
Wheel, Complete	1,758	19	851	4,327	3,355	5,714	1,750
Driveshaft	2,115	2,321	3,772	2,114	3,271	3,609	2,288
Window Regulator	2,248	3,141	4,522	2,859	3,149	3,082	2,546

Source: ELVES own data, as reported by ATFs in the ELVES ATF Network

# 7 Green Procurement

ELVES operates a Sustainable Procurement Policy incorporating green, circular and ethical procurement. As part of its commitment to this policy it has committee to report on the steps undertaken in each area of procurement during the year.

#### Road transport vehicles and services

Out of a total of 4 vehicles, 50% of the fleet is fully electric. 25% is hybrid. Journeys are pooled where possible. Meeting in person is carefully considered.

#### **Electronic products**

No new IT products were purchased in 2024.

#### Paper products and printing services

Paper purchased for day-to-day printing was Ecolabel certified. Three runs of the DoT Motor tax renewal reminder flyer were printed on recycled (and recyclable paper).

#### **Food and Catering Services**

Not assessed for 2024 due to staff working from home. Catering used during Electric ELVES training programmes is provided where possible through the training centres canteens, facilitating the use of reusable crockery/cutlery.

#### Textile products and services and merchandise

No ELVES merchandise was purchased in 2024.

#### First Carbon Neutral Compliance Scheme in Ireland

ELVES became the first Carbon Neutral Compliance Scheme in 2022 and has continued this into 2024. ELVES' carbon neutral certification was attained through Carbon Footprint Ltd and represents the achievement of a goal set by the ELV compliance scheme in 2021. Carbon Footprint Ltd is a sustainability and carbon management specialist company which helps businesses to reduce emissions, operating costs, and develop sustainability credentials (<a href="https://www.carbonfootprint.com">www.carbonfootprint.com</a>).

ELVES worked with Carbon Footprint Ltd to become carbon assessed through a review of the company's activities and energy use. Carbon Neutral certification was achieved through contributions made to Quality Assurance Scheme approved global offsetting projects equivalent to ELVES' carbon footprint plus an additional 25%. Equipped with these sustainability credentials ELVES is committed to remaining carbon neutral, not only by contributing to offsetting projects, but also by working to minimise emissions wherever it can in line with the goal of increasing the sustainability and circularity of our operations.

Recognising the importance of contributing to climate efforts locally as well as globally. ELVES continues to support Wolfgang Reforest, an Irish native tree planting social enterprise, to the equivalent of its annual carbon footprint. The enterprise seeks to address the biodiversity and climate crisis by restoring some of Irelands diverse species woodland cover, one land parcel at a time.