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ACRONYMS AND ABBREVIATIONS:

We have listed these at the end of the document.



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1. STAYING IN LANE

Welcome to ELVES' Annual Report reflecting our activities and achievements in 2019.

This Report was authored and published in a time when Covid-19 impacted upon the world in 2020. Consequently, we must put our achievements in 2019 in the context of the effects that Covid-19 has had on the global and national economy and psyche.

While we had a year in which targets were achieved, we must look forward to the years 2020 and 2021 and what has occurred within the sectors we are intrinsically affiliated to. With this in mind, this year's report is more empirical than heretofore.

We have both a vibrant ATF Network and reprocessing industry that were key to our successes in 2019. These are resilient sectors, but will need all the support we can provide for the forthcoming future. In 2019, we provided enough support to our ATF Network and our further PST augmentation, which means that not only did our Network meet targets, but also we contributed to the national target.

Our membership extends to almost all marques of domestic and light goods vehicles in Ireland. Even though our market share, and hence responsibility, extends to less than 60% of the total vehicles imported in 2019, we used all our resources to help attain national targets.

The real challenge facing us is 2020, a year like no other in our history, and 2021, a future which faces many uncertainties. It means a motor sector that has suffered great losses. It also means that the waste sector will be subject to waste availability, commodity fluctuations, and the effects of Brexit. ELVES is here and able to act quickly and assist all stakeholders in so far as is possible.

The team at ELVES.

2. ABOUT US

ELVES is a private not-for-profit company and operates as a collective compliance scheme for the motor industry. ELVES' operations are approved by the Minister for Communications, Climate Action & Environment. As the collective compliance scheme, ELVES ensures that our national collection system, the ATF Network, will achieve minimum targets of 85% reuse and recycling and 95% including recovery overall. Our members are those professional importers of vehicles that have obligations under the ELV Regulations relating to certain vehicle types:

- Domestic or passenger cars/ vans (no more than 9 seats) M1.
- Vans and light goods vehicles (under 3,500kg in weight) N1.

The full list of members can be found on our website. These undertakings fund our activities, which are:

- Providing information to the public about why, how, and where to scrap a car.
- · Supporting our ATF Network (reuse and recycling).
- Supporting our reprocessors (recycling and recovery).

ELVES is led and controlled by a Board of executive and non-executive directors, consisting of representatives from the vehicle manufacturing/ importing sector and independents. At each AGM one third of the Directors who have been longest in office since their last election retire. The Chair is a rotating role and the last meeting in 2019 was chaired by Karen Mahon. Our Board collectively ensure delivery of the objectives, set strategic direction, and uphold best corporate governance.

Board as of Sept 2019	Affiliation	Meeting Attendance*
Alan Nolan (R)	Independent	3/3
Anja Köckritz (R)	ASIA-Consult, Independent	3/3
Brian Cooke (A, N)	SIMI	3/3
Ciaran Kinahan (N)	MDL	2/3
Clodagh Walsh	Volvo	2/3
Colin Griffin	FCA Group	3/3
Fiacra Quinn (E)	ELVES, CEO	3/3
Frank Glynn (A)	Nissan	2/3
Irene Collins	EIQA, Independent	3/3
Karen Mahon	OCAE, Independent	3/3
Noel Hughes (N)	Subaru	1/3
Paul Murray (R)	Toyota	2/3
Robert Guy	VW Group Ireland	3/3

^{*} Includes remotely and by proxy. E – Executive. Committees: Audit (A), Nomination (N), Remuneration (R)

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.

3. A STATISTICAL OVERVIEW

Supply

In 2019, half the domestic cars imported into Ireland were used imports, mainly from the UK. About one third of the light commercial vans were used imports.

Supply of total vehicles, 2019	M1 (car)	N1 (van)	Total
New Imports	51%	66%	53%
Used Imports	49%	34%	47%

Compliance

ELVES had 130 company members, 20 of which are manufacturers and distributors of new vehicles (99.9% of compliant volume of new vehicles). The remaining 110 companies represent a low number of used imports, i.e. 6% of the volume of used imports are compliant. There have

Compliance 2019	Total
New Imports*	99.9%
Used Imports	6.3%
Self-compliance	0%

^{*} Excludes new SsangYong and new private imports

been no self-compliant producers since ELVES commenced operations.

ATFs

The minimum number of ATFs required to be in the ELVES national collection system is 47. The ELVES Network was 64 at the end of the year. The ATFs are responsible for reporting data in the first half of 2020 concerning the dismantling and recycling activities they undertook in 2019. ELVES also assist the ATFs in their reporting with additional system support for smaller sites. This is backed up with a 20% annual audit rate by ELVES.

In 2018, the ATFs were introduced to a modified system of AERs through the NWCPO. It means that data concerning their reception, depollution, dismantling, and onward transfer of the ELV hulks to reprocessors in accordance with the ELV Regulations can be captured in detail and on-line just the once for the entire year. For the year 2019, the data is reported in H1 2020.

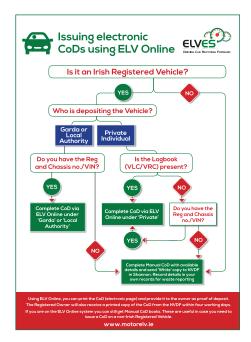
A new feature on our website is the ability for the public to leave feedback about their experience with the ATF. This is anonymised and provided to the relevant ATF.



CoD Issuance

Before the introduction of ELVES, CoD issuance was nearly all paper based. However, DTTaS had an on-line system that was capable of issuing eCoDs, and in cooperation with DTTaS, and the support of the WERLAS, ELVES reversed this trend in the first year of operations. To-date, over 90% of CoDs are issued on-line and by post. Nearly all the ATFs in the ELVES Network are online.

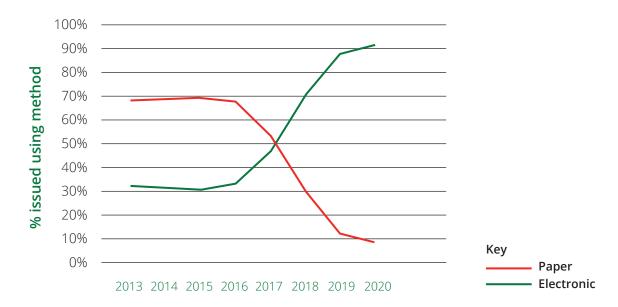
CoD issuance below is measured against an accurately estimated national ELV figure, the final numbers dependent on the EPA's determinations. The results currently indicate:



- In 2018, 53% of all ELVs went through the ELVES Network of 64 ATFs, comprising 73% of CoDs issued nationally.
- In 2019, it was estimated 54% of all ELVs went through the ELVES Network of 64 ATFs, comprising 80% of CoDs issued nationally.
- CoD issuance at the remaining 130 ATFs outside of the Network account for only 20% of CoDs issued nationally.

At some point in the near future, with the support of the DCCAE and DTTaS, ELVES would like to see the on-line system become mandatory along with a phased elimination of the paper based one.

Switch from paper CoDs to on-line CoDs



Targets

We have concluded that ELVES has **met** not only the Network targets, but also contributed to the **national targets** of 85/95% reuse, recycling, and recovery **in 2018**. This is subject to the EPA's determinations and they are currently finalising their reporting relating to 2018.

In 2019, ELVES measures target against the estimated total ELVs arising, not CoDs. Although only about 54% of ELVs go through our Network, we are using our limited resources to cover at least 66% of total ELVs arising nationally. Our statistical analysis shows that this is the proportion for which we can aim to attain the reuse, recycling and recovery targets utilising the combined activities of ATFs, metal reprocessors, and PST.

While ELVES ensures **all** the ATFs in our Network legally meet their targets as individual economic operators, the uplift in the national targets is due to our activities. In essence, ELVES support of PST augmentation, in which ASR is further segregated to extract every last possible kilogram of recyclates, means that **targets are attained**. Initial results for 2019 are indicating that ELVES will meet national targets for 2019. Again, this is subject to the EPA's determinations.

Financials

At the time of writing, ELVES Financial Statements 2019 have yet to be signed-off by the Board. However, the income and proportional expenditure are broadly in line with 2018 and that which was budgeted for in 2019. Our income was expended in the following areas:

Direct Reuse, Recycling, & Recovery Costs	61%
Advertising, Marketing, & PR	17%
Compliance Management	3%
Administration & Overheads	19%

4. THREE INVESTIGATIONS & A STUDY

At the request of stakeholders, ELVES investigated three waste streams arising from ELVs and conducted a study of missing parts.

After a visit to Gannon Eco (<u>www.gannoneco.ie</u>), we were asked to look at the feasibility of collecting windscreens from ATFs. Gannon Eco are experts in reprocessing waste glass, so the investigation did not investigate their processes or markets for their products. Instead, ELVES concentrated on the efficiency of current methods, the availability of feedstock from the ATFs, and the practicality of separating the windscreen from the ELV. The investigation was concluded in 2019 and the results were:

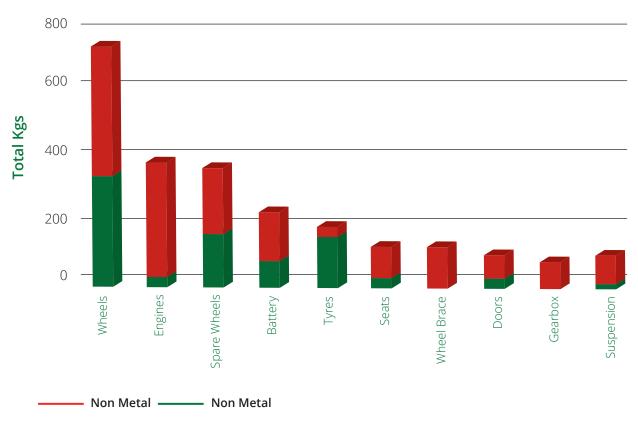
- Glass is already segregated out as aggregate in the ELV recycling process. This includes non-laminated glass as well.
- Collecting windscreen glass from an ATF incurred additional unnecessary cost and logistics.
- Removing the glass from the ELV incurred additional cost and time and was not practicable in the day-to-day operations of an ATF.

The second investigation involved the segregation of bumpers at ATFs. The conclusions were the same as above with the costs of segregating, bulking, and transporting even greater than handling glass on its own. To elucidate, not even considering the cost of handling and baling at the ATF, the value of bulked material in a standard container does not meet the environmental cost and expense of its transportation.

The third investigation was specific to DPFs and their explicit and deliberate absence from ELVs arising at ATFs. The investigation was inconclusive as the age profile of vehicles becoming ELVs by and large predates the mandatory inclusion of a DPF. This would benefit from a future investigation where DPFs are more commonplace.

Finally, ELVES conducted a missing parts study at the request of the EPA. The purpose was to determine parts that were taken from the vehicle for reuse prior to being deposited at an ATF. This will assist with target calculation. Almost 200 vehicles were inspected by a member of the Institute of Automotive Engineers & Assessors at different ATFs. Of over 600 missing parts, the results were:

Top 10 Parts by Contribution (Non Metal and Metal) **to Total Weight of Missing Parts**



The most common items missing were wheels (tyres and rims) and the automotive battery.

5. EDUCATION & AWARENESS

ELVES efforts to increase awareness of our ATF Network and the correct way to scrap a vehicle continued in 2018, with several targeted promotional activities supporting a wider advertising campaign.

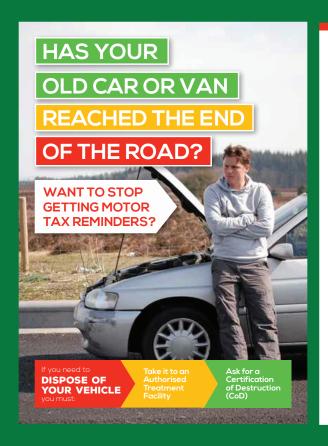
ELVES continued to use media outlets and social media platforms that worked in previous years, with a strong focus on radio to raise awareness amongst public and importer audiences. In addition to our public advertising on car recycling, an important aspect of our awareness activities is in ensuring used car importers are aware of their obligations under the ELV Regulations and the compliance service ELVES provides.

A summary of our core programme is as follows:

Medium	Medium Details	
Radio	Consumer: Clare FM, East Coast, Highland, KCLR, Kerry FM, KFM, Midlands, MWR, Ocean FM, South East, SS&NS, Tipp FM, Sunshine FM, FM104 Q102, WLR, Galway Bay, Limerick Live, LMFM, C96, 103	
Radio	Importer: 98FM, Spin 1038, Spin SW, iCombined, Beat FM, Classic Hits 4FM, Clare FM, East Coast, Highland, KCLR, Kerry FM, KFM, Midlands, MWR, Ocean FM, South East, SS&NS, Tipp FM, Sunshine FM	
Print	Corkman, Dublin People Group (North-east, west & South), Drogheda Independent, Leitrim Observer, Mayo News, Limerick Leader, Meath Chronicle, Midland & Tullamore Tribune, Northern Standard, Nationalist Series (Carlow, Kildare, Laois), Sligo Champion, Wexford People, Waterford News and Star, Dublin Gazette, SIMI, Local Authority News.	
Digital	Core Programmatic (targeted Digital Ads), Facebook, Google Ads, CarsIreland, Various competitions	

Motor Tax Renewal Reminders

In 2018, ELVES with the support of DTTaS, started a very significant initiative in raising awareness of the correct way to scrap a vehicle, namely the inclusion of a leaflet in every motor tax reminder sent by post to vehicle owners in Ireland. Produced by ELVES and distributed by DTTaS, approximately 1.9 million leaflets will be sent by post every calendar year with a text version sent in the electronic reminders. The benefit is that the communication is direct to the proportion of owners that intend to scrap their vehicle rather than re-tax it.



Scrapping a Car or Light Commercial Vehicle: What you need to know

This information applies to:

- Domestic or passenger cars/SUVs/vans (no more than 9 seats).
- Commercial vans/ light goods vehicles (under 3,500kg in weight).

An Authorised Treatment Facility (ATF) is a permitted scrapyard that will accept your vehicle free of charge (if it is complete and free of rubbish).

You can find an ATF near you by checking your local authority website. If you are scrapping your vehicle, you should always use an ATF. If you do not, you could be liable for a €100 fine.

Only ATFs can issue you with a Certificate of Destruction (CoD).

A CoD marks your vehicle as scrapped on the Department of Transport's central database.

Once a CoD has been issued, you will no longer receive motor tax reminders.

This information is brought to you by





Events

Public engagement and feedback are important to ELVES, and as with previous years ELVES took stands at a number of events around the country.

Events

Terenure Car Show - 15,000 people, Forever Young Festival – 50,000 people, Cork Summer Show - 80,000 people, Winterfest – 6,000 people

Promotion of Electric ELVES

In addition to our public awareness activities, ELVES had a lot of success in 2019 promoting the Electric ELVES programme. An outcome of our first round of training days was a video to promote the training, which can now be viewed on the ELVES YouTube channel ELVES Ireland. The training days also got good coverage in local and national media.

We also took the opportunity to promote the programme and ELVES at the Electric Vehicle Summit at Croke Park in October.

Impact

Since ELVES was officially launched in mid-2017, we have aimed to build awareness of ELVES, our Network and the correct way to scrap a vehicle. Our education and awareness activities in 2019, built on the work done in 2017 and 2018 and as a result we have seen a steady increase in the volume of traffic to our website, searches for ATFs undertaken, followers of our Facebook page and vehicle importers seeking further information on joining ELVES via our website.

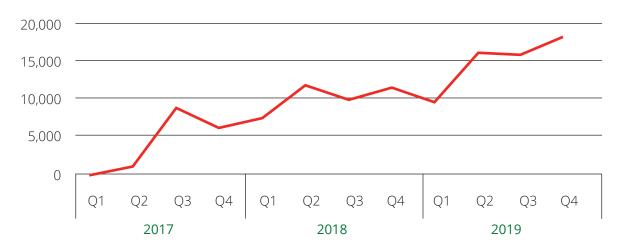








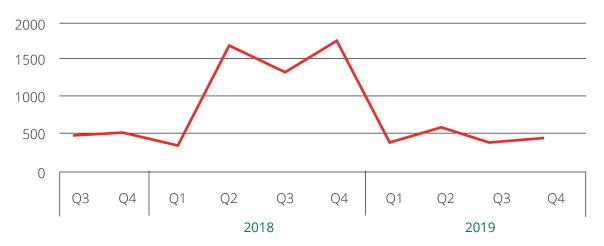
Website Sessions (Quarterly)



ATF Searches (Quarterly)



Motor Dealer Information Views (Quarterly)



6. ELECTRIC ELVES



Electric ELVES is the programme for industrial batteries from hybrid and electric vehicles in Ireland. It has been set up by ELVES and 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 electric, hybrid, plug in hybrid, or mild hybrid vehicle, or indeed have an industrial battery that needs collection. The Electric ELVES programme is available to all ATFs, not just those in the ELVES Network. It also covers those batteries arising in the aftersales sectors.

Most notably, with the support of the IMVRA 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 (IDIS),
- Additional manufacturer support in the event of a damaged battery, and
- Free collection and recycling of batteries if required.

The Electric ELVES programme provides a single point of contact for ATFs and OEMs for the takeback of industrial batteries. Information on the programme is regularly distributed by ELVES to all ATFs and to OEMs via SIMI. In developing the programme, ELVES has an agreed system in place for each manufacturer, delivering on their collection and recycling requirements under the ELV and the Batteries Regulations. The programme provides a collection and recycling service for manufacturers if required (charged per collection) but is also aligned with existing recycling agreements manufacturers have in place.



To-date 14 batteries have been collected for recycling.

A key addition to the programme in 2019, was the introduction of workshop/ classroom based training for ATFs in awareness and safe handling of electric and hybrid vehicles. ELVES has seen high demand for the training provided by Salvage Wire Ltd, with over 90 people trained to date across 5 locations. The training has benefited from the excellent facilities provided by training venues and ELVES would like to thank those sites for their enthusiastic support for the programme: Cork Institute of Technology, Plunkett College Dublin, Galway Mayo Institute of Technology, Rally School Ireland and Nissan Training Academy.

ELVES will continue to run the course in 2020, subject to Covid-19 restrictions.





7. REGULATOR & LOCAL AUTHORITY ENGAGEMENT

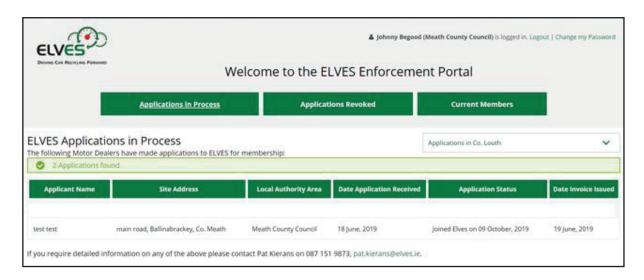
ELVES had many successful stakeholder engagements throughout 2019.

Mid-way through the year, the operation of ELVES was reviewed by the DCCAE to its satisfaction. At the time of writing this report, ELVES will be applying for a further 5-year period of approval in twelve months' time.

DTTaS has been most helpful throughout the year, supporting the distribution of awareness flyers in motor tax renewal reminders and ongoing collaboration in promoting and improving the ELV Online system. ELVES is confident this will continue throughout 2020.

The relationship between the EPA, the NWCPO and ELVES has grown in strength. We trust that the work ELVES does with the ATF Network and the metal reprocessors contributes to the EPA's determination of target attainment.

In discussions with the WERLAS, ELVES has constructed a portal so that individual LAS may access it to assist their enforcement activities.



ELVES has also met with WEEE Ireland and Repak ELT to explore and implement areas of common compliance. Data on battery recycling has been provided to WEEE Ireland and tyres were included in our missing parts study to help calculate the ELV targets.

8. OUTLOOK FOR 2020

At the time of writing, the country is in lockdown with Covid-19. Along with the rest of the economy, the motoring sector has changed irrevocably in 2020, with significant repercussions for the following years. They have restarted one week ago and although early signs are promising, there still is uncertainty.

The effects on the waste industry are multi-faceted. Within our own area, we have seen the closure of both the ATF Network and the downstream metal reprocessors. The reasons are due to the impact of restrictions brought in to contain the spread of Covid-19, the current (and potential future) dearth of ELVs, lack of storage, lack of available shipping logistics to send ASR overseas, and not least the forthcoming commodity market fluctuations.

In our strategic planning, we must prepare that the shocks we are experiencing now will undoubtably ripple into 2021 and beyond. ELVES is in good operational shape for 2019 to 2021 and will be able to support our members, our Network, and the metal reprocessors. We will also drive ahead with the Electric ELVES programme.

At this point in time, our strategic planning indicates that the future will happen and it will be positive. Until then, please check our website and Facebook page regularly.

9. ACRONYMS

DTTaS Department of Transport, Tourism and Sport

AER	A facility's waste report (Annual Environmental Return)	ELV ELVES	Scrap car (End-of-Life Vehicle) The ELV scheme (ELV	
ASR	Auto Shredder Residue, the stuff & fluff that is left after metal	EPA	Environmental Services CLG) The Environmental Protection	
	shredding		Agency	
ATF	Scrapyard (Authorised Treatment Facility)	EPR	Extended Producer Responsibility	
CoD	Vehicle's death cert (Certificate of Destruction)	NVDF	National Vehicle Driver File, Shannon	
eCoD	The electronic/ on-line CoD	NWCPC	National Waste Collection Permit	
DCCAE	Department of Communication,		Office	
	Climate Action and Environment	PST	Post Shredder Technology,	
DPF	Diesel Particulate Filter		needed to sort the ASR	



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