



Human Environment and Transport
Inspectorate
*Ministry of Infrastructure
and Water Management*

An Exporter Perspective on the Export of Used Vehicles

UNRSF Project Safer and Cleaner Used Vehicles for Africa
- Joint Importers & Exporters Meeting, Rwanda
Marietta Harjono, 1st of September 2022



OUTLINE

- What is the Dutch Human Environment and Transport Inspectorate?
- ILTs work on export of fuels and vehicles to African countries
- Current (absence of) export criteria on used vehicles
- Future export criteria for used vehicles: Dutch perspective
- Next steps





The Human Environment and Transport Inspectorate works on
safety, trust, and sustainability of environment and transport
in the Netherlands





› Our fields of expertise:

- Transport
- Infrastructure
- Environment
- Housing

■ With approximately 150 topics



OUTLINE

- What is the Dutch Human Environment and Transport Inspectorate?
- ILTs work on export of fuels and vehicles to African countries
- Current (absence of) export criteria on used vehicles
- Future export criteria for used vehicles: Dutch perspective
- Next steps





2018



Inspectie Leefomgeving en Transport
Ministerie van Infrastructuur en Waterstaat

Heavy fuel oil for sea-going vessels

On-road fuels for West Africa

Blended in the Netherlands

2020



Human Environment and Transport
Inspectorate
Ministry of Infrastructure
and Water Management

Used vehicles exported to Africa

A study on the quality of used export vehicles



2021

TNO innovation
for life

Traffic & Transport
Anna van Buerenplein 1
2595 DA Den Haag
P.O. Box 96800
2509 JE The Hague
The Netherlands

www.tno.nl
T +31 88 866 00 00

TNO report

TNO 2020 R11950

Petrol fuel quality and its effects on the vehicle
technology and the environment

Date	22 December 2020
Author(s)	Norbert E. Ligterink, Ruud P. Verbeek, and Rob F.A. Cuelenaers
Copy no	2020-STL-REP-100336338
Number of pages	25 (incl. appendices)
Sponsor	Dutch Human Environment and Transport Inspectorate, ILT
Project name	Benzinekwaliteit en eisen
Project number	000.43177

All rights reserved.
No part of this publication may be reproduced and/or published by print, photoprint, microfilm or any other means without the previous written consent of TNO.

In case this report was drafted on instructions, the rights and obligations of contracting parties are subject to either the General Terms and Conditions for commissions to TNO, or the relevant agreement concluded between the contracting parties. Submitting the report for inspection to parties who have a direct interest is permitted.

© 2021 TNO



Fuel quality

Fleet quality

Year of construction

Why 3 studies?

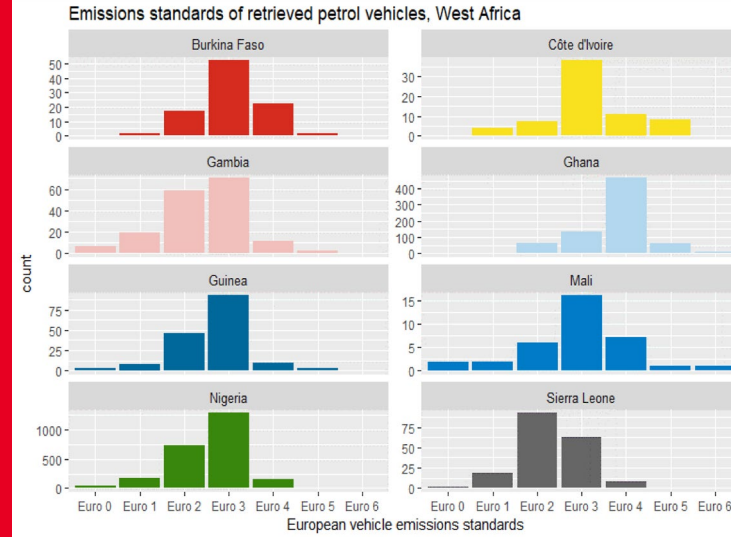




MAIN FINDINGS

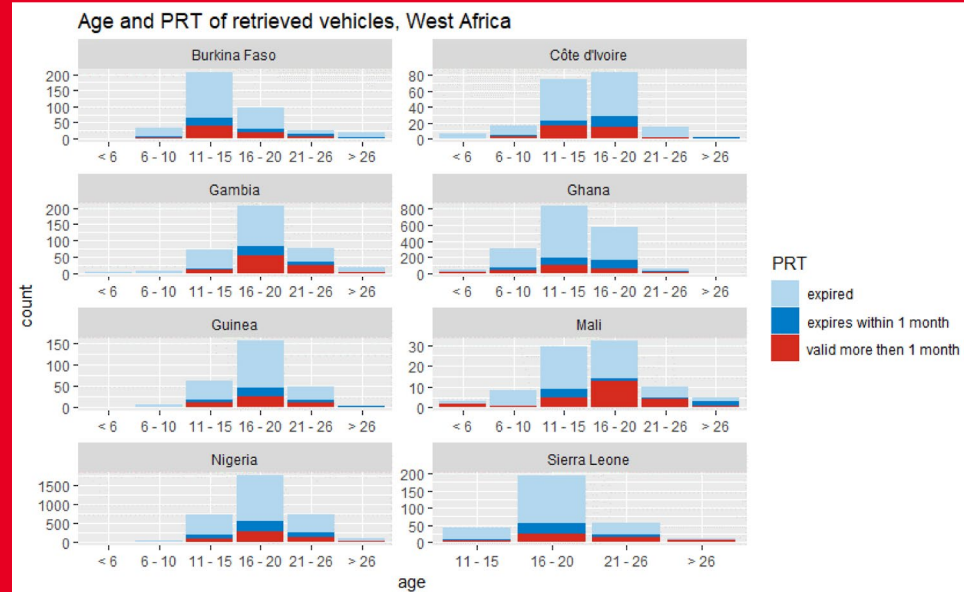
Used vehicles exported to Africa

A study on the quality of used export vehicles



Age distribution retrieved LDV

Country	count	mean	Q1	Median	Q3
Burkina Faso	122	15.3	12.8	15.4	17.2
Côte d'Ivoire	77	14.2	12.5	14.9	17.0
Egypt	230	13.8	12.6	14.3	15.5
Ethiopia	113	12.6	9.8	13.2	15.1
Gambia	359	18.8	15.9	18.4	20.8
Ghana	987	12.4	10.2	11.7	14.2
Guinea	219	17.2	15.3	17.2	19.0
Libya	638	17.8	15.8	17.6	19.6
Mali	49	14.9	12.5	14.8	17.8
Morocco	257	4.7	3.5	4.3	4.9
Nigeria	2526	17.7	15.4	17.4	19.6
Sierra Leone	246	18.1	16.5	18.2	19.5





ILTs follow-up on the 3 studies (1)

Export of low-quality fuels

- August 15, 2022:
ILT published a Policy rule based on the duty of care principle in Dutch law
- Article 9.2.1.2 of the Environmental Management Act stipulates that: *'Any person who professionally manufactures a substance, mixture or genetically modified organism, or imports it into the Netherlands, applies it, processes it or makes it available to another person, and who knows or could reasonably have suspected that their actions with this substance, mixture or organism could cause hazards to human health or the environment, is obliged to take all measures that can reasonably be required of them to prevent or limit these hazards as much as possible.'*
- [Policy rule on maintaining the quality of petrol and diesel intended for export to low and middle income countries outside the EU, with special reference to the ECOWAS countries 2022 | Publication | Inspectie Leefomgeving en Transport \(ILT\) \(ilent.nl\)](#)





ILTs follow-up on the 3 studies (2)

Used vehicles

- Provide insights on the quality of used vehicles exported
- Cooperate with our policy makers to promote EU/international regulation on export of used vehicles





OUTLINE

- What is the Dutch Human Environment and Transport Inspectorate?
- ILTs work on export of fuels and vehicles to African countries
- Current (absence of) export criteria on used vehicles
- Future export criteria for used vehicles: Dutch perspective
- Next steps





Currently limited possibilities to act

EU Waste Shipment Regulation No 1013/2006

–one if its objectives is to ensure that waste exported outside the EU does not create adverse effects on the environment or public health in the countries of destination, by prohibiting the export of hazardous waste to non-OECD Decision countries and waste destined for disposal operations outside the EU

By enforcing this regulation some vehicles for export can be stopped as (hazardous) waste =>





Example 1

A heavily damaged car after accident,
a Nissan Micra from 2003 for
Benghazi, Libya



EXAMPLE 2

A Volvo from 2020 for Nigeria with many deficiencies: VIN unreadable, lights and battery removed, exhaust system incomplete, bumper missing, fuel tank missing, air tanks hanging loose, smooth tires





EXAMPLE 3

A Volkswagen bus from 1988 for Lagos, Nigeria with many damages: left auxiliary beam 100% rust damage, shaft seriously deformed, heavy gasoline smell





EXAMPLE 4

a heavily damaged car from the US waiting in Antwerp to be shipped



OUTLINE

- What is the Dutch Human Environment and Transport Inspectorate?
- ILTs work on export of fuels and vehicles to African countries
- Current (absence of) export criteria on used vehicles
- Future export criteria for used vehicles: Dutch perspective
- Next steps





VIEW OF THE NETHERLANDS

Regulating trade of used vehicles has major benefits for air quality, road safety and climate

It is important to get an agreement at EU level on enforceable and objective/ clear export criteria for used vehicles:

- Proof of roadworthiness
- Minimum euro 4/IV
- Compliance with import regulations of import countries



ROADWORTHINESS

<- our field study showed that in depths controls at port of export are very difficult

to makes use of existing European roadworthiness systems and procedures therefore essential

information exchange on vehicle between customs -export declarations- and national vehicle registers and between countries is important (through the VIN of vehicles)

**DIRECTIVE 2014/45/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL****of 3 April 2014****on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC****(Text with EEA relevance)**

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 91 thereof,

Having regard to the proposal from the European Commission,

After transmission of the draft legislative act to the national parliaments,

Having regard to the opinion of the European Economic and Social Committee ⁽¹⁾,

After consulting the Committee of the Regions,

Acting in accordance with the ordinary legislative procedure ⁽²⁾,

Whereas:

- (1) In its White Paper of 28 March 2011 entitled 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system', the Commission set out a 'zero-vision' objective whereby the Union should move close to zero fatalities in road transport by 2050. With a view to attaining that objective, vehicle technology is expected to contribute greatly to improvement of the safety record of road transport.
- (2) In its Communication entitled 'Towards a European road safety area: policy orientations on road safety 2011-2020', the Commission proposed a further halving of the overall number of road fatalities in the Union by 2020, starting from 2010. With a view to attaining that goal, the Commission set out seven strategic objectives, and identified actions for safer vehicles, a strategy to reduce the number of injuries and measures to improve the safety of vulnerable road users, in particular motorcyclists.
- (3) Roadworthiness testing is a part of a wider regime designed to ensure that vehicles are kept in a safe and environmentally acceptable condition during their use. That regime should cover periodic roadworthiness testing of vehicles and technical roadside inspection of vehicles used for commercial road transport activities, as well as providing for a vehicle registration procedure allowing for the suspension of a vehicle's authorisation to be used in road traffic where the vehicle constitutes an immediate risk to road safety. Periodic testing should be the main tool to ensure roadworthiness. Technical roadside inspections of commercial vehicles should merely be complementary to periodic testing.

ROADWORTHINESS

Exporters of used vehicles should substantiate its claim that the vehicle is roadworthy

- by ensuring the vehicle has a valid roadworthiness certificate
- or in the absence of this, by providing an alternative and recent roadworthiness test certificate



WHY MINIMUM EURO 4?

- Fuels – vehicles systems approach
- Emissions reductions
- Climate change
- Road safety
- Cost savings for consumers
- Euro 4/IV seems reasonable global minimum standard



OUTLINE

- What is the Dutch Human Environment and Transport Inspectorate?
- ILTs work on export of fuels and vehicles to African countries
- Current (absence of) export criteria on used vehicles
- Future export criteria for used vehicles: Dutch perspective
- [Next steps](#)





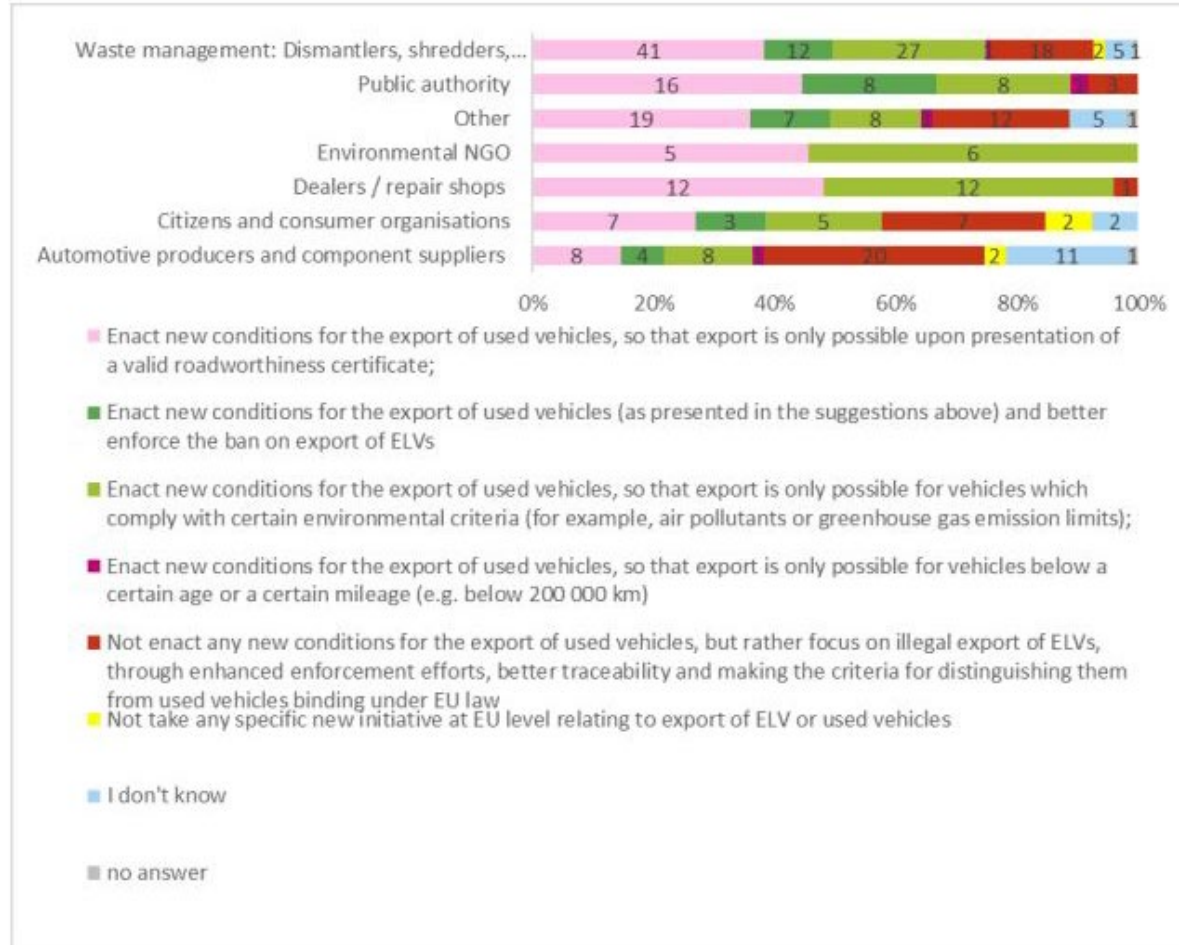
NEXT STEPS

- The European Commission is well aware of the issue and involved in discussions on that matter at the global level, with UNECE and UNEP especially
- EU proposed at the United Nations Environment Assembly this year to call for strengthening legislations on used vehicles globally
- The EC is looking into the question of export of used vehicles, as part of the review of Directive 2000/53/EC on end-of life vehicles





Question 10: Which of the following options is in your view the most adequate to overcome the problem of 'illegal exports' of ELVs to non-EU countries, as well as the problem posed by the export of used vehicles which are not considered as waste? (more than one answer could be indicated)



Making the presentation of a roadworthiness certificate as a condition for exporting used vehicles was considered by 52% of stakeholders (as an appropriate measure to overcome the problem of 'illegal exports' of ELVs and of exports of ELVs as used vehicles. Compliance with certain environmental criteria was the second most favoured option (74 of all participants) followed by conditions on maximum age or on maximum mileage (61 of all participants)

Screenshot from:

"SUMMARY REPORT ON THE PUBLIC CONSULTATION FOR THE IMPACT ASSESSMENT OF THE REVIEW OF THE DIRECTIVE 2000/53/EC ON END-OF-LIFE VEHICLES AND OF THE DIRECTIVE 2005/64/EC ON THE TYPEAPPROVAL OF MOTOR VEHICLES WITH REGARD TO THEIR REUSABILITY, RECYCLABILITY AND RECOVERABILITY"



NEXT STEPS: how to speed up the process?

- To agree internationally on (clear) criteria governing the export/import of used vehicles
 - > this would facilitate the adoption of measures on this issue by the EU
- EC values the cooperation with importing countries
 - > importing countries reaching out to the EC with proposals, views, concerns and priorities



Key dates related to EU policy on end-of-life vehicles

- Q4 2022** ○ **Commission's proposal for the Review of the ELV Directive**
- 20 July - 26 October 2021** ○ **Public consultation on the revision of EU rules on end-of-life vehicles**
Contribute to the public consultation
- 16 March 2021** ○ **Evaluation of the ELV Directive published**
See the evaluation
- 22 October-19 November 2020** ○ **Roadmap for the Impact Assessment of the ELV Directive published**
View the roadmap.
- 15 September - 8 December 2020** ○ **Stakeholder consultation on the renewal of three exemptions**
For more information visit <https://elv.biois.eu/>
- 18 September 2000** ○ **Directive on end-of-life vehicles enters into force**



Thanks for your attention!
Our contacts

- Our website www.english.ilent.nl
- Customer contact (0031) (0)88 489 00 00
- Contact with the team: marietta.harjono@ilent.nl