Exporting second-hand vehicles and used automotive components/spare parts – leaflet

Waste characteristic of second-hand vehicles

When exporting vehicles there is a big difference between second-hand or end of life-vehicles (i.e., waste). The distinction between second-hand or end of life-vehicles is based on the Correspondents’ Guidelines No. 9. They represent the common understanding of all Member States on how to interpret Regulation (EC) 1013/2006 on the shipment of waste.¹

A **second-hand vehicle** is to be classified as **waste** if one or more of the following criteria apply:
- A certificate of destruction exists;
- The vehicle comes from a waste collection or waste treatment system;
- The vehicle is intended for dismantling and recycling of its spare parts or for shredding / scrapping;
- The vehicle has components – with the exception of personal belongings – that need to be disposed of or whose export is forbidden according to community or national law;
- The vehicle is a write-off / needs more than minor repairs / has sustained serious damage to key components (e.g., from an accident) or is cut into pieces (e.g., two halves);
- No documents have been presented despite a request from the competent authority or another government authority such as customs, police, or another government institution.

To classify a **second-hand vehicle as waste**, the following indicators may also be relevant:
- More than two years have passed since the vehicle last underwent the statutory national technical inspection;
- The vehicle has no identification number and the owner of the vehicle is unknown;
- The vehicle was handed over to an authorised interim storage facility or an authorised waste treatment facility;
- The repair costs exceed the current vehicle value (exception: old-timers) and it is impossible to presume a repair (repair costs in EU Member States may serve as a first approach for assessment);
- The vehicle lacks appropriate protection from damage during transport or loading and unloading, e.g., from damage resulting from usage as a "container" for objects such as spare parts, used electric and electronic equipment, or waste;
- All vehicle openings are welded closed or closed with insulating foam;
- The vehicle poses a safety or environmental hazard, e.g., because
  - Doors are missing on the vehicle; or
  - The vehicle releases fuel or fuel vapours (fire and explosion hazard);
  - The liquid gas system is leaking (fire and explosion hazard);
  - The vehicle releases operating fluids (water contamination hazard from fuel, brake fluid, antifreeze, battery acid, coolant);
  - Brake and steering components show excessive wear and tear.

If the vehicle owner claims that they are shipping an operational vehicle or a repairable second-hand vehicle which could, taking all conditions into account, be repaired at reasonable expenses, this is to be documented to the responsible authority on a case by case basis. In that case, the requested certification is to be presented to the responsible authorities.

Waste characteristic of used components / spare parts

When dismantling automotive parts from scrapped vehicles, the vehicles as a whole and also the parts they contain and which are removed during dismantling are initially considered waste. Automotive parts from dismantled vehicles lose their waste characteristic if - possibly following repair, cleaning, sorting, or other preparatory action – it is possible to re-install them in vehicles in accordance with relevant legislation.


If – as part of an inspection – authorities are of the opinion that the used automotive components / spare parts are potentially waste, they may demand comprehensive and detailed certification from the owner of the used automotive components / spare parts.

Exporting **used and functional** components / spare parts for immediate re-use abroad cannot be objected to from a waste legislation point of view provided the export guidelines below are being followed.

Exporting components / spare parts that are **not functional** is generally **prohibited**. The exporter must prove that the objects are functional! The following applies:

1. **Certification of origin of used components / spare parts is required!**
   Upon request of the authorities, the owner of the components / spare parts must present the following immediately: Copy of invoice or purchase contract; owner's declaration that it is not waste.

2. **In principle, only exporting functional used components / spare parts is allowed. As a rule, it is possible to reuse them immediately for their original purpose in accordance with relevant legislation without requiring additional repairs, cleaning, sorting, or other preparatory action. Please ensure that**
   - The components / spare parts are neither corroded nor damaged;
   - The components / spare parts are not contaminated with oil;
   - Components / spare parts containing fluid(s) are completely empty or closed and cannot leak.
   - Exporting functional airbags is not allowed.
   - Cut-off or severed vehicle halves / vehicle parts are considered waste and exporting them is not allowed!

If there are indications that they might be waste, provide certification of the functionality of the components / spare parts.

**It is recommended to record the functionality and inspection results of automotive (spare) parts in a checklist, e.g. according to the following template:**
<table>
<thead>
<tr>
<th>Serial No.</th>
<th>Manufacturer</th>
<th>Designation of component / spare part</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Bosch</td>
<td>Fuel injection pump</td>
<td>Functional</td>
</tr>
<tr>
<td>2</td>
<td>Getrag</td>
<td>Gearbox</td>
<td>Completely empty, no functional impairment, dismantling facility XY, Stuttgart</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Company's address / person who has checked the objects

3. **During transport, loading, and unloading, ensure to package components / spare parts properly so they cannot sustain any damage.**

![Examples]

Spare parts, where it is tacitly accepted that storing them in a way that fails to preserve their value may result in further and/or initial damage, are also deemed waste.

4. **The following is to be enclosed with the shipment:**
   - A transport document (CMR bill of lading or delivery note) including the amount of exported used components / spare parts; or
   - A freight list (checklist).

For transport, label the parts intended for export to be able to collate each part to an entry on the enclosed transport documents.

**Contact person(s)**

For questions regarding the classification of used components / spare parts as waste or non-waste, please contact the responsible waste law authorities of the municipality and districts at the headquarters of the company.

For questions regarding the export of second-hand vehicles, please contact SAA Sonderabfallagentur Baden-Württemberg GmbH, Fellbach, phone: +49 (0)711 951961 0.