# Proper Work under the End-of-Life Vehicle Recycling Law



- Simplified manual -

Supervision: Japan Auto Recycling Partnership (JARP)

# Background of the designation of fluorocarbons and airbags as items to be covered under the End-of-Life Vehicle(ELV) Recycling Law

#### [Airbags]

Since airbags use gas-generating agents and carry the risk of explosion leading to threats to the security and safety of the recycling process, the Japan Automobile Manufacturers Association, Inc. (JAMA) in 1999 voluntarily stopped the usage of toxic sodium azide as the gas-generating agent, and in the EU vehicle scrapping directive\* adopted in September 2000, it was stipulated that parts with the risk of explosion (such as airbags) should be removed or inactivated as part of new regulations concerning prior dismantling for the preparation of scrapping. Particular care needs to be given to the disposal of airbags in the dismantling process.

#### **%**EU vehicle scrapping directive\*= DIRECTIVE 2000/53/EC (Annex I)

May 1997: Decision on "ELV recycling initiative"

- Oct. 1999: Beginning of the Airbag Inflator Collection and Disposal System (demonstration experiment project)"
  - Objective: Individually, efficiently and safely process non-activated inflators without destroying them in a shredder process, and simultaneously conduct activities to promote understanding of the project, by calling on ELV disposal business operators to attain a license for the tasks required under the waste disposal laws in order to prepare for future actual operations.
  - Operation: To establish the Airbag Inflator Collection and Disposal Center\*\* at the Japan Automobile Manufacturers Association, Inc. (JAMA) and create and operate, together with the Japan Auto Parts Industries Association (JAPIA), a system for the collection and disposal of inflators fitted on ELVs (until March 2005)

To collect the inflators from the driver's seat and front passenger seat removed by business operators registered with the Airbag Inflator Collection and Disposal Center through the use of the existing recovery network for exhaust gas catalysts (with 21 stations around the country) and take them for disposal to the two special facilities.

The costs of the operation, including those for collection, transportation, disposal, operation of the center, will be covered by the Japan Automobile Manufacturers Association, Inc. (JAMA) and the Japan Auto Parts Industries Association (JAPIA).

\* Record of performance from Oct. 1999 through Mar. 2005 (for reference)
Number of registered operators: 1,865 companies (2,362 offices)
Number of units of collection/disposal: driver's seats 201,243 units, front passenger seats 47,017 units, total 248,260 units

July 2002:Enactment of the Law Concerning Recycling Measures of ELVs (ELV Recycling Law)January 2005:Full enforcement

To introduce on-vehicle activation process to dispose airbags by having dismantlers activate them by running current through them while still installed in end-of-life automobiles in addition to collection through the use of the existing scheme based on the Airbag Inflator Collection and Disposal System.

- Objective: By making it compulsory for automobile manufacturers and other firms to collect and recycle inflators, etc., in addition to the project of the Airbag Inflator Collection and Disposal System, it is expected that designs which make it easier to remove and recycle airbags, etc. will be adopted through creative efforts on the part of the automobile manufactures etc., leading to the promotion of scale and efficient recycling and disposal.
- Operation: To uniformly manage and control the disposal process of ELVs (collection, recovery of fluorocarbons, dismantlement [disposal of airbags], and shredding) through the construction of an electronic manifest system.

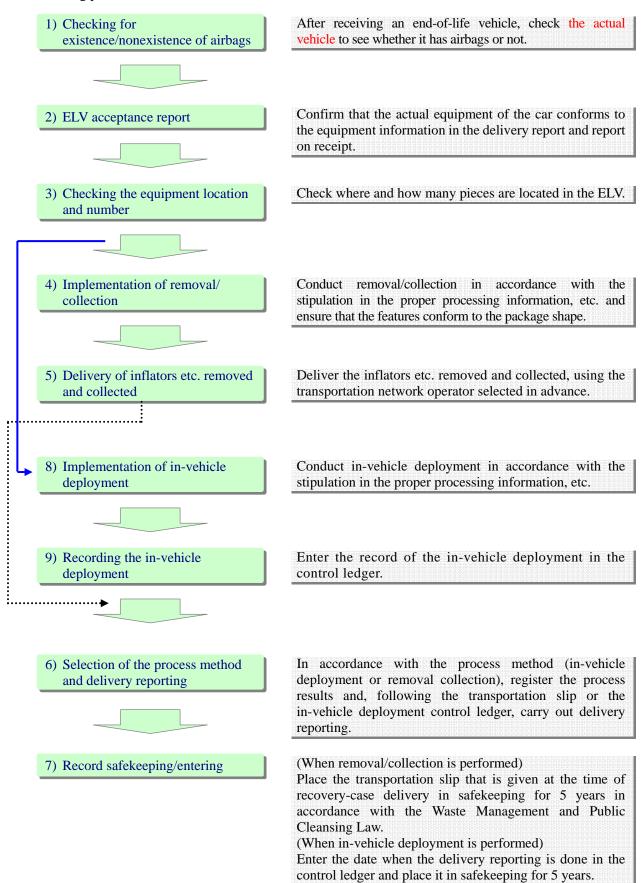
Collection of the costs of recovery/recycling from the car users is conducted by Japan Automobile Recycling Promotion Center, and the Japan Auto Recycling Partnership (JARP) is commissioned by automobile manufacturers/importers to conduct duties such as making payments to dismantlers, acceptance station operators and recycling facilities.

With regard to on-vehicle activation disposal, it is considered that recycling is performed on behalf of the automobile manufactures, etc., so it is necessary to receive government approval upon conclusion of a consignment contract between car manufactures, etc. (with the Japan Auto Recycling Partnership (JARP) acting as the liaison) and dismantlers.

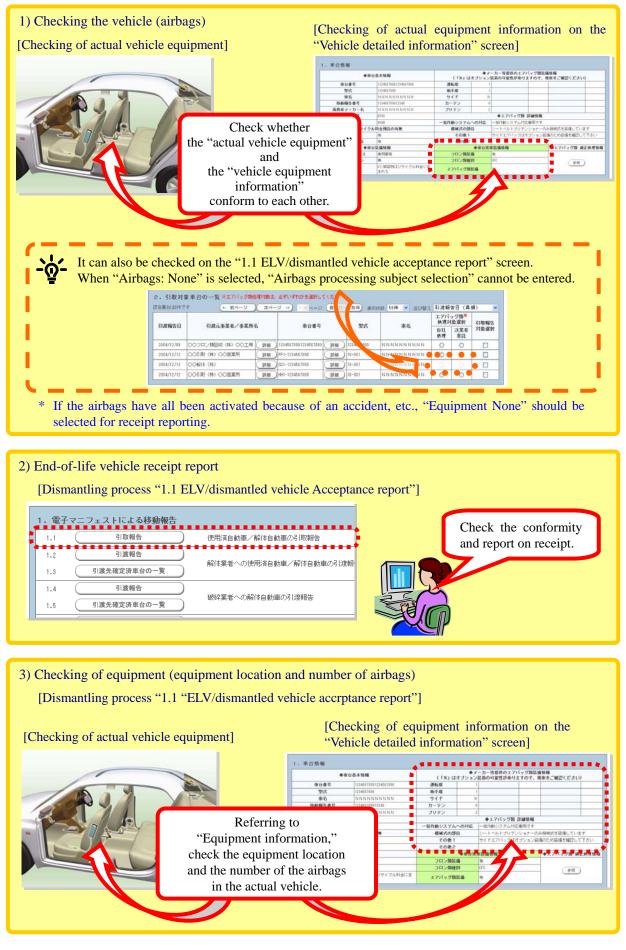
### I. Correct and Proper Work for Airbags

#### 1. Work procedure

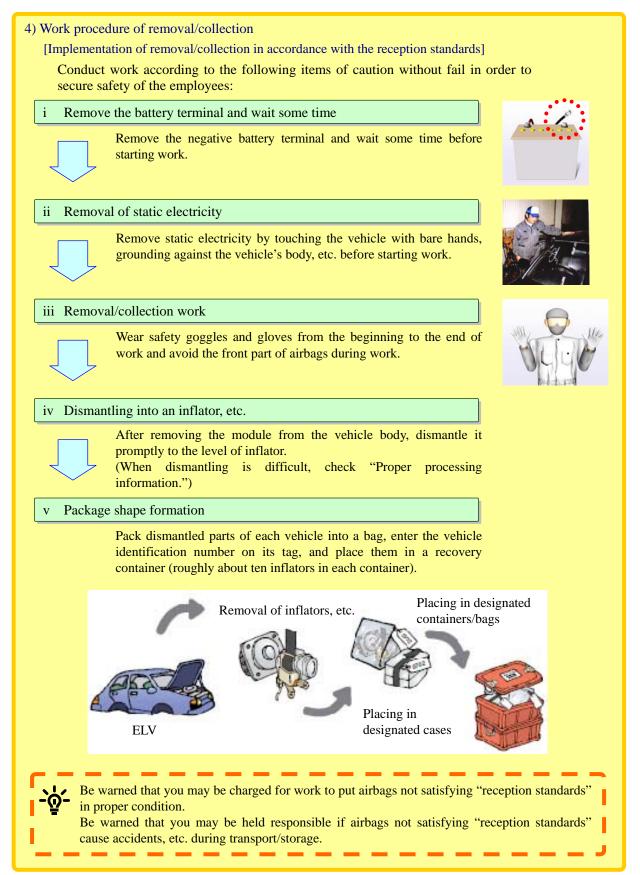
Be sure to perform the removal/collection and in-vehicle deployment work for airbags, observing the following procedures.

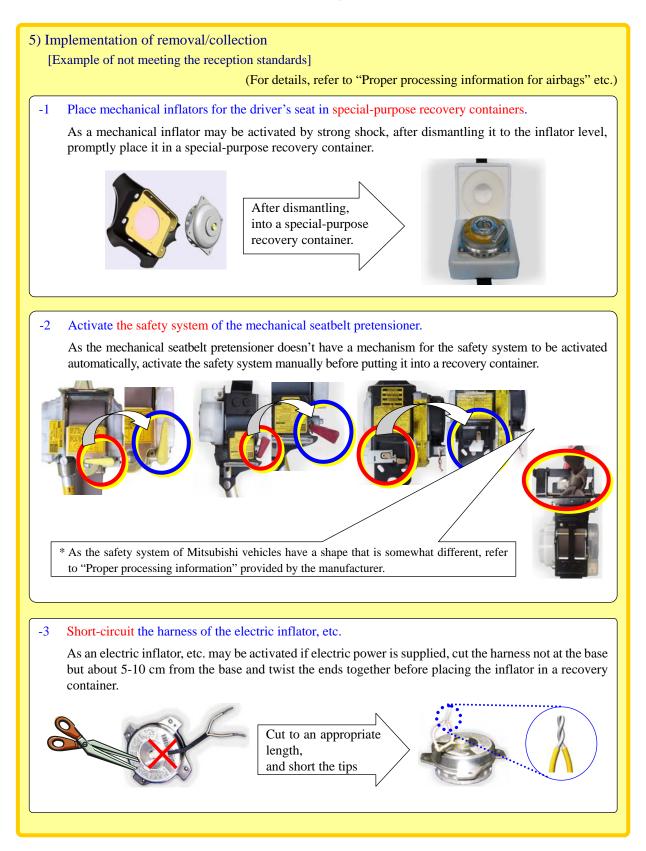


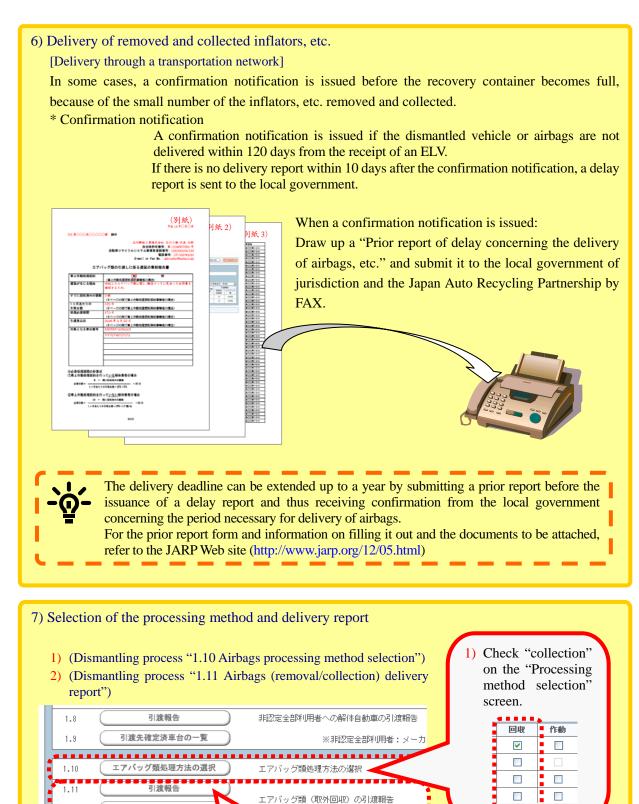
#### 2. Work contents



#### (1) Work of removal/collection







7

グ類(車上作動処理)の引渡報告

群馬県前橋市大手町1-1-

皇高荣港区大门1,1-3

0909999 A A 1 2 - 3 4 5 6 7 8 9 0

45678

DD45-6789012

引渡先確定済荷姿の一覧

the transportation slip.

"Deployment" and "Collection."

2) Implement delivery reporting based on

\* When partial deployment and partial collection are performed, check both

引渡報告

1.12

1.13

#### 2) In-vehicle deployment work operation

[Basic points of the in-vehicle deployment commissioning contract]

As for in-vehicle deployment, be sure to make commissioning contracts with auto manufacturers, etc. and obtain authorization from the Ministry of Economy, Trade and Industry and Ministry of the Environment first and perform its operations in accordance with the following items:

(For details, refer to "Items to observe in airbag in-vehicle deployment".)

#### a. Compliance with contract contents

- ♦ Make clear who is the person in charge of the in-vehicle deployment operations
- ✤ Properly perform safekeeping and management of documents related to rules, application, etc.
- $\diamond$  Thoroughly disseminate the information provided by auto manufacturers, etc.
- ✤ In principle, perform in-vehicle deployment
- ♦ Report delivery based on control ledger.

b. Proper in-vehicle deployment

- $\diamond$  Conduct work in accordance with the safe and sure methods stipulated by the auto manufacturers, etc.
- ♦ Conduct maintenance and control of the facilities and equipment in conformity with the licensing conditions of the dismantling business.
- ♦ Use tools necessary for performing in-vehicle deployment properly and control them properly in terms of examination, safekeeping, etc.

#### c. Recording and reporting

- ♦ After performing in-vehicle deployment, promptly enter the record in the control ledger
  - \* As we might ask you to return the recycling fees already paid if a control ledger has not been made, the record cannot be confirmed although there exists a control ledger, or there are missing items in the control ledger, be sure to keep proper records.
  - \* Be sure to keep the control ledger in safekeeping for 5 years.

#### d. Response to complaints

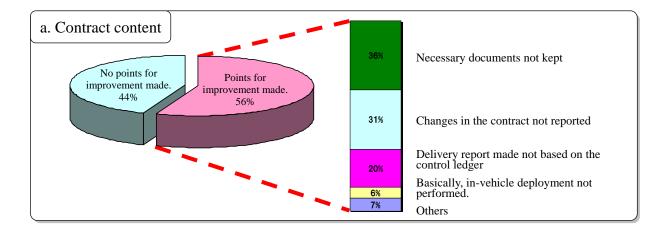
✤ In order to be able to make a quick and proper response and improvements if complaints, etc. come from the neighborhood, make clear who the person in charge is.

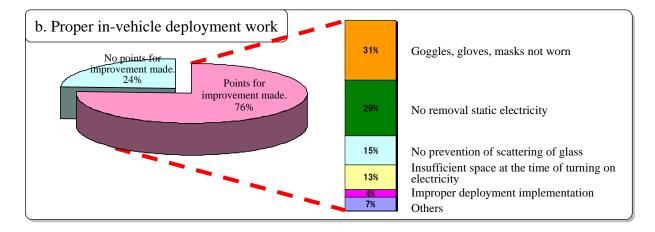
#### e. Acceptance of work investigations

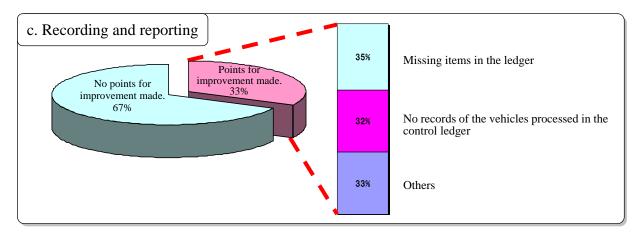
- ☆ Accept auditing etc. carried out by the Japan Auto Recycling Partnership (JARP) or persons commissioned by it in order to check the status of work performance, etc.
  - \* Please understand that if cooperation with auditing, etc. cannot be obtained, we might have to cancel the contract.

[Actual situation of in-vehicle deployment (main points made at the time of in-vehicle deployment auditing)]

In the in-vehicle deployment auditing conducted by Japan Auto Recycling Partnership, it was found, unfortunately, that some operators were performing airbag in-vehicle deployment by wrong methods of their own.





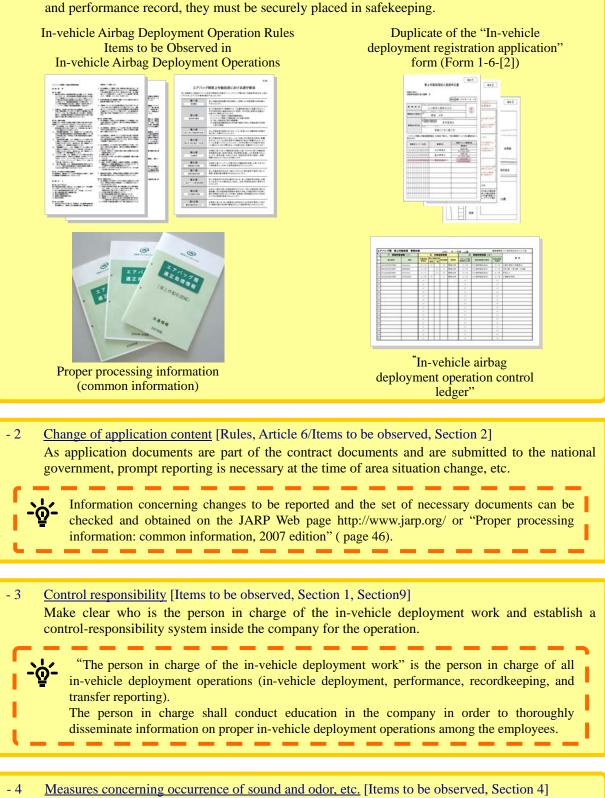


In-vehicle deployment is to perform the act of recycling on behalf of the auto manufacturers, etc. under commissioning contracts with the auto manufacturers, etc. with the authorization of the Ministry of Economy, Trade and Industry and Ministry of the Environment, such as the commissioning contracts made under the Waste Management and Public Cleansing Law.

Therefore, like auto manufacturers, it is subject to inspection by a national institution concerning the work and control of its records. If the above work content is judged to be inappropriate, administrative guidance, admonition, notification, or orders will be given.

#### a. Contract content

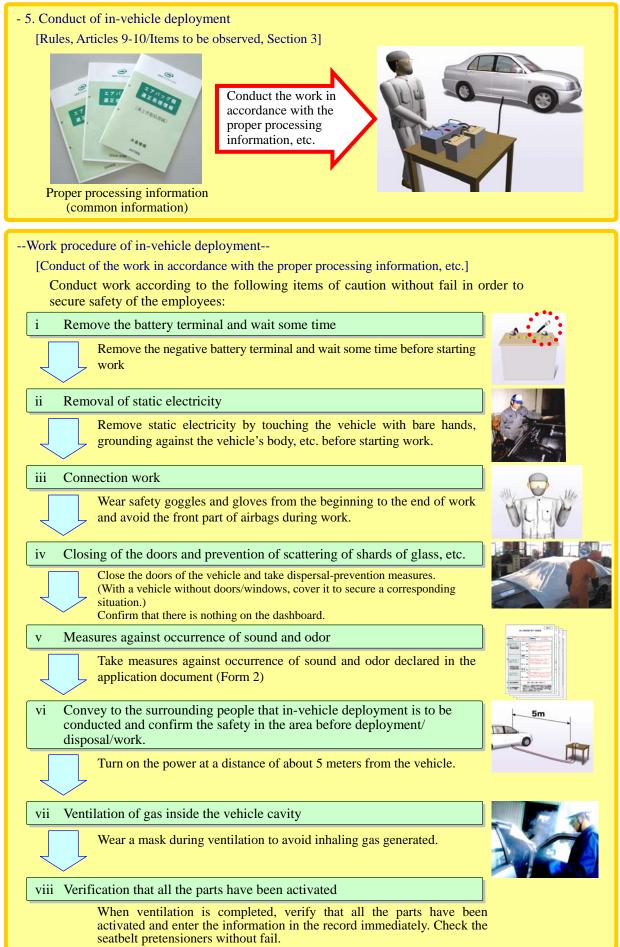
- 1. <u>Safekeeping of necessary documents</u> [Items to be observed, Section 2, Section 5] As the documents below are important as commissioning contract documents, operation manual, and performance record, they must be securely placed in safekeeping.



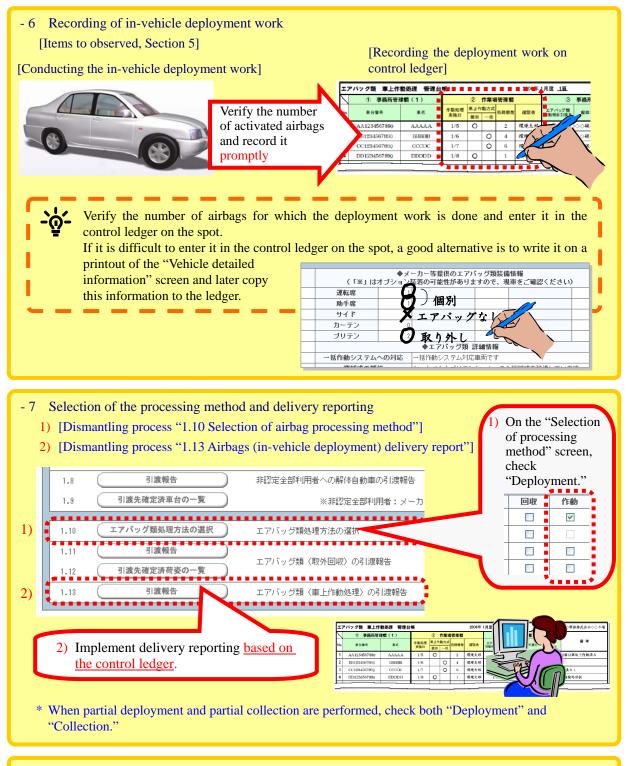
Give thorough consideration to preventing sound and odor that accompany the work from having bad effects on the workers and the area.

In order to be able to make quick and proper responses and improvements if complaints, etc. come from the neighborhood, make clear who the person in charge is.

#### b. Proper in-vehicle deployment work



#### c. Recoding and reporting



#### - 8 Record entering

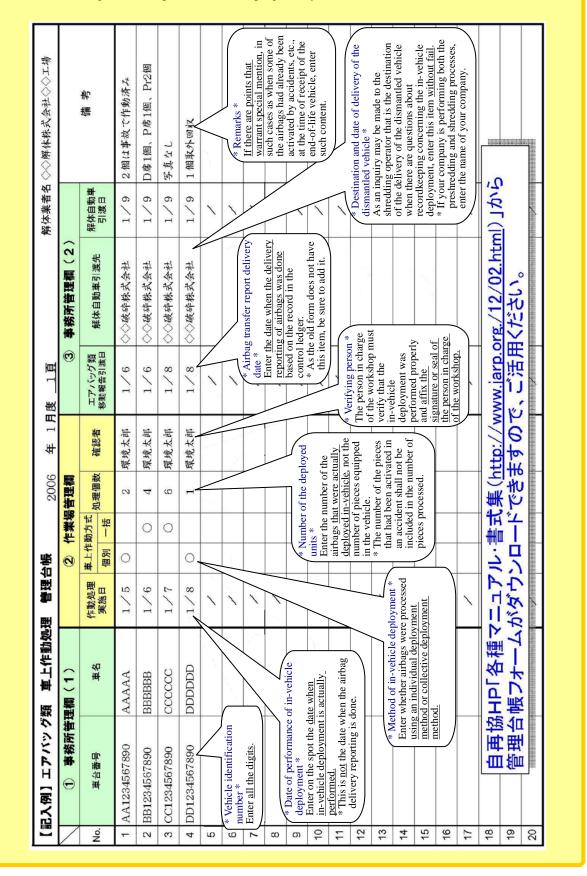
[Entering the delivery reporting date in the control ledger]

$\setminus$	① 事務所管理	翌欄(1)		2	作業等	管理欄		3	事務所管理欄(2)	)	
No.	単合番号	東名	作動処理 実施日	車上作 個別	動方式 一括	処理借数	確認者	エアバッグ類 移動報告引渡日	解体自動車引渡先	ELV 引波日	備考
1	AA1234567890	АЛАЛА	1/5	0		2	環境太超	1/6	/	1/9	2個は事故で作動済み
2	BB1234567890	BBBBB	1/6		0	4	<b>環境太護</b>	1/6		1/9	
3	CC1234567890	CCCCC	1/7		0	6	環境太好	1/8		1/9	写真なし
4	DD1234567890	DDDDD	1/8	0		1	環境太好	1/8	L-	1/9	1個取外回収

#### --Record entering--

[Contents entered in the control ledger]

As the "In-vehicle Airbag deployment control ledger" is an important document in which to enter the record of actually performing in-vehicle deployment, it is necessary to enter all the items specified. This control ledger must be placed in safekeeping for 5 years.



#### 3) Irregular cases

We here cite cases that frequently occur.

When such a case occurs, respond by the following method:

- 1) The transfer reporting from the previous process shows Airbags: "NONE", but the actual vehicle has airbags equipped. Actual vehicle Transfei quipmen report JON It is necessary to ensure that the actual vehicle equipment and the equipment information in the transfer report conform to each other. As otherwise the fee will not be paid even if you perform work, request the ELV handling firm to correct the equipment information from "NONE" to "YES"
- 2) The transfer reporting from the previous process shows Airbags: "YES", but the actual vehicle has no airbags equipped. Actual vehicle



It is necessary to ensure that the actual vehicle equipment and the equipment information in the transfer report conform to each other. As otherwise the transfer reporting will not be completed, request the ELV handling firm to correct the equipment information from "YES" to "NONE"

equipmen

Transfer

report

3) The vehicle detailed information shows "mechanical airbags," but the actual vehicle is equipped with "electronic airbags."

Which should be conducted, removal/collection or in-vehicle deployment?

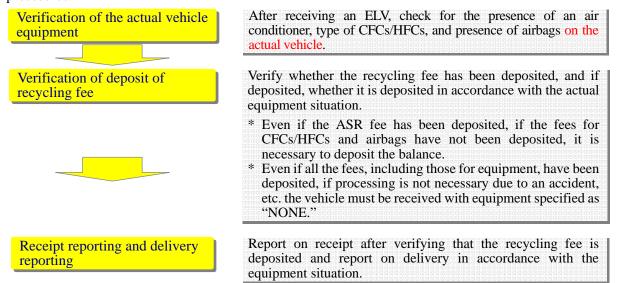
Even with the same car model, you may find a mixture of vehicles equipped with mechanical and electronic airbags, depending on model changes, and sometimes the auto manufacturers, etc. do not have full information concerning older cars.

Even if the "Vehicle detailed information" shows "mechanical airbags" and the actual vehicle equipment is "electronic airbags," in-vehicle deployment work must be conducted.

## II. Correct and proper work of the ELV handling process

### 1. Work procedure

The receipt and delivery work of the ELV handling operator must be conducted according to the following procedures:

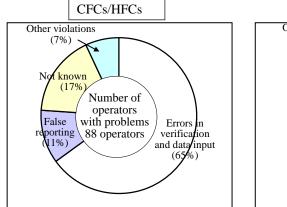


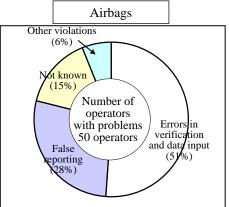
<Survey result>

According to "Research and the result of administrative guidance concerning equipment information on CFCs/HFCs and airbags in ELVs" published by the Ministry of the Environment on May 14, 2007, 88 operators (15% of the investigated operators) were found to be neglecting verification of equipment concerning CFCs/HFCs and 50 operators (14% of the investigated operators), concerning airbags, and all of these operators had been given administrative guidance/admonition, etc., by the prefectures, etc., of jurisdiction by March 2007.

Situation of operators inv	restigated	CFCs/HFCs	Airbags		
Number of local governm	nents that needed to conduct surveys	101	93		
Number of local governm	nber of local governments that conducted surveys				
Local governments that d	al governments that did not conduct surveys				
Number of operators inve	estigated	583	349		
Number of operate	¥	88	50		
	Administrative guidance	34	20		
Response	Admonition	6	4		
	Notification	48	26		
Operators in violat	Operators in violation				

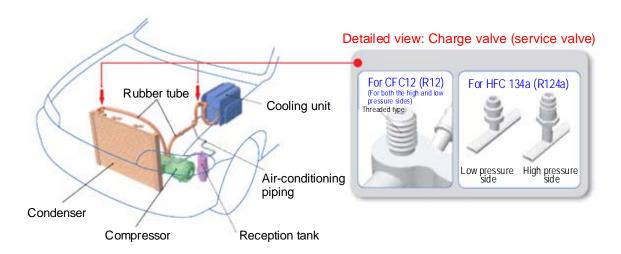
It was also found that above violations, etc. could be classified as shown below.

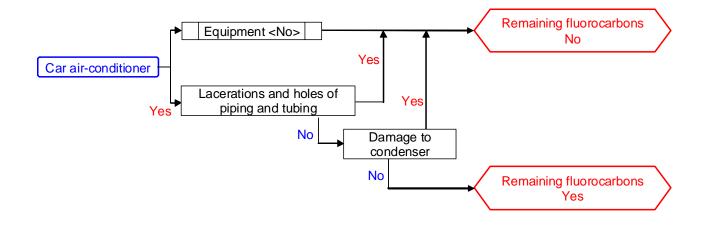




#### 2. Work contents

#### 1) Method of judgment about existence of remaining CFCs/HFCs

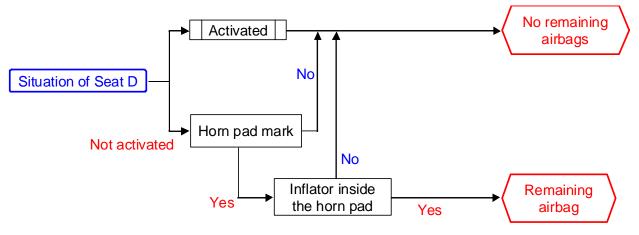




2) Method of judgment about existence of remaining airbags Outline of the equipment locations of airbags



Verification of driver's seat (D seat) airbag <Example>



Check of seatbelt pretensioner equipment

