

INFORMATION SHEET



FREQUENTLY ASKED QUESTIONS

REQUIREMENTS OF THE STANDARD

ARE ATFS THAT SELL SOME PARTS THROUGH A DIY YARD ALLOWED ON THE SCHEME?

Operators that ONLY sell parts via DIY yards do not fall within the scope of the standard, as these parts are typically untested and ungraded.

ATFs that primarily sell parts in line with the standard (i.e., they grade, remove, store and record every target part so that it is fully traceable to the donor vehicle), may also sell some parts from a DIY yard. In this instance, these

vehicle recyclers may be certified. However, any parts sold to customers from the DIY yard cannot be claimed to fall within the scope of the standard and must not be sold as certified vehicle parts. The vehicle recycler must make this clear to the customer and have different terms and conditions of sale.

WHY ARE AIRBAGS NOT INCLUDED IN THE STANDARD?

Airbags have not been included in the Standard for safety reasons. We do, however, recognise that some vehicle recyclers do sell airbags and their associated components, and it is legal to do so.

The inclusion of airbags into the Standard will be reviewed later this year.

WHY IS TRACEABILITY OF PARTS SO IMPORTANT?

It is important to trace every target part back to its donor vehicle and to the customer who bought it for a number of reasons:

- So that you can inform the customer who purchased the part if there is a subsequent safety recall (see Recalls).
- So that you can demonstrate that the donor vehicle has been acquired legally. This helps differentiate certified vehicle recyclers from other sellers of used vehicle parts that may not have been acquired or dismantled legally.
- So that you can accurately identify the specific make and model of the donor vehicle to aid matching the manufacturers' part numbers (MPNs) and paint codes. This helps you market the parts correctly, given the wide variation in parts between and within models.
- So that you can comply with SMDA13 in recording the source of the vehicle.

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HOW DO I KNOW IF THERE IS A PRODUCT RECALL ON A PART?

The Standard requires vehicle recyclers to check every incoming ELV destined for dismantling to identify whether any of the parts have been subject to a recall by the manufacturer and/or Driver and Vehicle Standards Agency (Section 6.3.2). If the vehicle is destined for immediate scrap (crushing), then there is no need to check for recalls as no parts will be re-used.

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There are three ways in which this requirement can be met:

1. Check the vehicle's MOT history

www.gov.uk/check-mot-history

The main downsides with this approach are that:

- a. It only shows recalls that are active at the time of the search, meaning that recalls issued on previously dismantled vehicles will not be accessible; and
- b. It also doesn't identify what the recall is – only whether or not there is an outstanding recall.

Additionally, this database is not thought to be consistent with data held by the vehicle manufacturers.

2. Check the Government's recalls database

www.gov.uk/check-vehicle-recall

This allows users to either enter a vehicle's make, model and year of manufacture, or to download a spreadsheet. The spreadsheet lists all recalls issued since 1992 and lists vehicles by VIN ranges. It is a large dataset, containing over 13 thousand listings, so it's not particularly user friendly.

3. Invest in an automated recalls management system

– At present there is only one main system available: All Auto Recalls (AAR)

www.autopartneredsolutions.com/allautorecallsuk.

This has been developed in Australia for the UK market and work has been done to integrate the system with the Pinnacle yard management system, although this is not currently enabled. The AAR system is both proactive and reactive – dealing with recalls on vehicles previously dismantled and those about to be dismantled.

Whichever system is used, it is important to ensure it is used consistently and that evidence is retained for the certification body to check during audits.

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All product recalls are listed here:

www.ccpc.ie/consumers/product-safety/product-recalls/

WHAT DO I DO IF I IDENTIFY A RECALLED PART?

There are a number of options depending upon the type of recall, the part and whether it has been sold or not:

- **Parts that have been sold** – you will need to contact your customer and advise them of the recall. The manufacturer is responsible for rectifying the problem that led to the recall, so you should advise them how to contact the manufacturer.
- **Parts that have not yet been sold** – these will need to be removed from your inventory and destroyed.

- **Recalls that relate to an assembly issue** – generally, as the parts would have been removed during dismantling, this should not affect their saleability; however, it's always best to double check this first.

For all of these steps, it's important to ensure that they are adequately documented and that records are kept for auditing purposes.

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WHAT IS MEANT BY A SPECIAL CONSIDERATION AND A HAZARD CATEGORY?

The Standard requires vehicle recyclers to assess all risks associated with the depollution and recycling of ELVs and to introduce appropriate control measures in order to comply with relevant UK law (section 5.1.2). It also requires vehicle recyclers to check every end-of-life vehicle to identify whether it has been assigned to any particular hazard category (section 6.3.1).

When a vehicle arrives at an ATF that may present additional hazards to those typically found, this means that a risk assessment needs to be carried out and additional control measures introduced if deemed necessary.

Examples of this include:

- **Flood damaged vehicles** – these may be contaminated with pathogenic microbes (harmful bugs) that have the potential to infect operatives or customers. The vehicle recycler will therefore need to introduce measures to clean the vehicle (or relevant parts of it), ensure that the operatives wear appropriate personal protective equipment (PPE) and

identify only those parts that can be cleaned for re-sale. Absorbent or interior parts from flood damaged vehicles generally should not be sold on, as they cannot be cleaned and sanitised sufficiently; likewise, electrical components may also be unsuitable for re-sale.

- **Severely damaged vehicles where the occupants may have been hurt** – in these instances, these vehicles may be contaminated with bodily fluids, needles and other medical consumables if the emergency services have attended. In these instances, the person removing the part from the vehicle may be injured or infected. Again, a risk assessment should be carried out and only those target parts not affected by the hazards sold on.
- **Electric and hybrid vehicles** – these need to be identified and clearly marked so that only those technicians trained to make safe and dismantle high voltage (HV) batteries and components do so using the appropriate HV tools and PPE.

FURTHER INFORMATION IS
AVAILABLE ON THE VRAC
WEBSITE

WWW.VRACERTIFICATION.ORG.UK/
INFORMATION

