

February 4, 2013

Automobile Division, Manufacturing Industries Bureau,  
Ministry of Economy, Trade and Industry

Office for Recycling Promotion,  
Waste Management and Recycling Department,  
Ministry of the Environment

NOTICE REGARDING PARTS ALLOWED TO BE REMOVED  
FROM VEHICLES FOR EXPORT (tentative English translation)

Below is an explanation of the cases in which vehicles for export shall be deemed as dismantled ones, the parts which are allowed to be removed from vehicles for export, and the cases in which vehicles and their parts for export shall be deemed as waste. This notice is based on the facts that the number of containers for export in which load used vehicles has increased and some improperly dismantled vehicles are exported as used vehicles.

1. Cases in which vehicles for export shall be deemed as dismantled ones

Vehicles for export which have undergone the following operations end their use as automobiles and therefore shall be deemed as dismantled vehicles. In addition, the following operations shall be deemed as dismantling of end-of-life vehicles (ELVs), and are allowed to be done only by Dismantling Operators who have obtained a license under the ELV Recycling Act.

- A) Half cut,
- B) Nose cut
- C) Roof cut
- D) Tail cut
- E) Removal of engine
- F) Removal of axle
- G) Removal of suspension

2. Parts which are allowed to be removed from vehicles for export

In addition to the cases described in 1, removal of parts from vehicles for export may be deemed as dismantling operations under the ELV Recycling Act. Nevertheless, removal of the accessories listed below shall not be deemed as dismantling operations under the Act.

- A) Car navigation equipment
- B) Car stereo equipment
- C) Car radio
- D) Built-in TV equipment
- E) ETC (Electronic Toll Collection) equipment
- F) Clock
- G) Sun visor
- H) Side visor
- I) Blind (including curtain and curtain rail)
- J) Mud flap
- K) Fire extinguisher
- L) Taxi (or other) fare meter
- M) Security light
- N) Burglar alarm
- O) Security glass (including that made of plastic)
- P) Tachograph
- Q) Dead weight meter
- R) Fare box (including change machine)

Moreover, removal of parts listed below from a vehicle shall not be deemed as dismantling operations under the ELV Recycling Act, only when the parts are removed in order to increase load efficiency of a container and are loaded in the same container with the vehicle.

- A) Tire
- B) Mirror
- C) Bumper
- D) Bonnet
- E) Rear hatch

### 3. Cases in which vehicles and parts for export shall be deemed as waste

ELVs, Dismantled Vehicles\* and Parts Specified for Recycling shall be deemed as waste, as described in article 121 of the ELV Recycling Act. In order to export waste, they must be confirmed by Minister of the Environment in accordance with the Waste Management and Public Cleansing Act.

Therefore, vehicles for export which undergo the operations listed in 1. A) to G), must have all of fluorocarbons, air-bags, lead batteries, lithium-ion batteries, nickel hydride batteries, tires, waste oil, waste liquids, and interior fluorescent lamps properly removed by licensed dismantling operators. When all of these items are not properly removed from the vehicles, they are likely waste, and thus, exporters may be liable for

punishment for unconfirmed export of waste even if this illegal exporting is not completed but only attempted.

\* Properly dismantled vehicles which are delivered to exporters to be utilized as raw materials as a whole shall be determined on a case-by-case basis whether they are waste or not.

#### 4. Offices in charge

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