

Temporary storage of ELVs at a vehicle dealership

Purpose

This position statement provides clarification on when end-of-life vehicles (ELVs) may be temporarily stored at a notified¹ vehicle dealership without a waste management licence.

Background

The storage of non-depolluted ELVs at a place other than where they were produced usually requires a waste management licence (WML).

However, storage of ELVs at a vehicle dealership which is notified to DEFRA as part of their collection system and complies with the conditions of this regulatory position statement will not require a WML to temporarily store ELVs. The ELVs must subsequently be taken to an Authorised Treatment Facility (ATF) to be depolluted and recycled, following hazardous waste consignment procedures.

Position and conditions that apply

SEPA will not normally take enforcement action when ELVs are temporarily stored at a vehicle dealership which does not hold a waste management licence provided the following conditions are met:

- ELVs must be stored at a vehicle dealership that is notified to DEFRA as part of the manufacturer's collection system under Regulation 10 of the [End-of-Life Vehicles \(Producer Responsibility\) Regulations 2005](#).
- No more than 5 ELVs shall be stored at the dealership at any one time.
- ELVs shall not be stored at the dealership for longer than 7 days.
- No dismantling or depollution of ELVs shall be carried out at the dealership.
- The ELVs must be stored on an impermeable pavement with a sealed drainage system.
- Equipment must be available to capture and mitigate spillages.
- Records must be kept (for two years) identifying ELVs arriving on site and dates of arrival and removal to an ATF. These records must be made available to SEPA upon request.

The temporary storage of ELVs in the circumstances set out above must not endanger human health or the environment. In particular, the storage of ELVs must not:

- cause a risk to water, air, soil, plants or animals
- cause a nuisance through noise or odours
- adversely affect the countryside or places of special interest.

If a vehicle dealership cannot meet these conditions then a waste management licence would be required to authorise the temporary storage of ELVs.

¹ Notified as part of a vehicle manufacturers collection system under Regulation 10 of the [End-of-Life Vehicles \(Producer Responsibility\) Regulations 2005](#)

This position statement applies only in Scotland. The terms of this position statement may be subject to periodical review and be changed or withdrawn in light of technological, regulatory or legislative changes, future government guidance or experience of its use. SEPA reserves its discretion to depart from the position outlined here and to take appropriate action to avoid any risk of pollution or harm to human health or the environment.