

ISRI Position on the Continuation of the National Vehicle Mercury Switch Recovery Program¹²

Overview

The National Vehicle Mercury Switch Recovery Program (NVMSRP) was created by a 2006 Memorandum of Understanding (MOU) that will expire at the end of 2017.² The MOU currently provides that auto manufacturers fund the End of Life Vehicle Solutions Corporation (ELVS), which supplies recyclers with buckets to collect mercury switches and covers the cost of shipping the buckets and recycling the mercury, as well as providing indemnification for participants once the switches are packaged and shipped. Steel and auto manufacturers have agreed to extend the life of ELVS until 2021. The participation of other NVMSRP MOU signatories - the U.S. Environmental Protection Agency (EPA), the Environmental Council of the States (ECOS), ISRI, the Automobile Recyclers Association (ARA), and the environmental organizations in the ELVS program – is currently under discussion.

It is the position of the Institute of Scrap Recycling Industries, Inc. (ISRI) that the recycling industry supports a continuation of the National Vehicle Mercury Switch Recovery Program (NVMSRP) through the end of 2021, conditioned upon the following sections of the 2006 Memorandum of Understanding (MOU) remaining essentially unchanged:

- The transportation, acceptance, recycling, and liability language regarding the End of Life Vehicle Solutions Corporation (ELVS) under Section V.1.C, subsections 3 through 6; and
- Language regarding the responsibilities of ISRI and participating vehicle crushers, scrap processing facilities, brokers, and vehicle dismantlers, as well as their interactions with other parties.

Sunset

This position is repealed, effective December 31, 2021.

¹ As adopted by the ISRI Board of Directors on June 20, 2017.

² Memorandum of Understanding to Establish the National Vehicle Mercury Switch Recovery Program; August 11, 2006 (<https://archive.epa.gov/mercury/archive/web/pdf/switch-mou.pdf>).