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Draft concept of a tradable certificate framework for achieving 40% “Made in Europe” content in PV and BESS manufacturing

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At the 43rd European Photovoltaic Solar Energy Conference and Exhibition (EU PVSEC 2026), based on the work of the ESMC Made-in-Europe-workgroup, a draft concept for turning the Net Zero Industry Act’s 40% domestic manufacturing benchmark into an enforceable, market-based instrument was presented. The proposed European Solar Content Credit Certification Scheme (ESCC-CS) is open for discussion, and we welcome feedback from members, policymakers and stakeholders.

Paper abstract
Decarbonizing Europe’s energy system requires resilient domestic photovoltaic (PV) and battery energy storage (BESS) manufacturing. Dependence on third-country supply chains poses strategic risks that existing policy instruments do not yet adequately address. This paper presents a draft concept for a binding, market-based tradable certificate framework that would require 40% of European value-added content in every PV module, inverter, mounting structure, and BESS installed in the EU. The unit is the European Solar Content Credit (ESCC): 1 ESCC equals 1 euro of verified European value creation. Manufacturers and importers comply physically or by purchasing certificates, with value creation verified through a central EU registry and independent audit. Strategic components such as polysilicon, wafers and cells may receive supercredit multipliers. A phased roadmap raises thresholds from 10% in 2027 to 40% by 2033, except for PV inverters, where surveyed European capacity already suffices for immediate application. It builds on the Clean Industrial Deal, is benchmarked against the US Buy American Act and China’s “dual-credit” policy, and leverages the EU Digital Product Passport. The concept is designed to be self-financing through certificate trading revenue.

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