



To:

Brussels, 9 December 2022

Commissioner Virginijus Sinkevičius
DG ENV Director-General Florika Fink-Hooijer

CC:

Commissioner Kadri Simson
DG ENER Director-General Ditte Juul Jørgensen
Commissioner Thierry Breton
DG GROW Director-General Kerstin Jorna

EU Green Public Procurement for solar PV products

Dear Commissioner Sinkevičius,
Dear Director-General Fink-Hooijer,

Solar PV is widely considered as a key solution to Europe's fossil fuel dependence and related energy price volatility. This is reflected in REPowerEU and the European Solar Strategy by increasing solar deployment ambitions for the next years and launching a solar industrial strategy to bring back parts of the supply chain to Europe.

For this to unfold sustainably, the EU Commission is currently working on a regulatory proposal to introduce sustainability measures – Ecodesign and Energy Label – setting mandatory requirements on PV products. While Ecodesign sets minimum market entry requirements that are applicable to all products placed on the EU market – with the aim to cut off the 10-15% least performing products – the Energy Label establishes an energy performance class system.

Crucially, however, the EU Commission Joint Research Center's [Preparatory Study](#) on the file indicated that **these two mandatory measures should be accompanied by a voluntary measure – EU Green Public Procurement (GPP)** – as this is a key vehicle to stimulate green innovation in a coherent framework of criteria promoting sustainability. There is a close interaction between the mandatory requirements and the voluntary measure, insofar as the former lays down the methodology underpinning the voluntary criteria. Metrics and requirements in Ecodesign and Energy Label are meant to be used in GPP as part of the input data, technical specifications and award criteria to determine the top performing products that can claim a lower environmental impact throughout their life cycle.

We regret to observe that **GPP has been sidelined from the ongoing policy discussion and at present does not seem a political priority for the EU Commission**. This is clearly at odds with the EU sustainability ambitions and its industrial strategy.

GPP is also a key instrument to strengthen the business case for EU-based PV manufacturing. With third countries having to set up very competitive frameworks to support their domestic solar manufacturing, the EU faces considerable challenges to reach its target to establish 30 GW of PV silicon-to-module manufacturing capacity by 2025, as outlined in the newly launched EU Solar PV Industry Alliance. Europe still retains an important competitive advantage in product sustainability, supply chain transparency, research and innovation, which should be leveraged to drive demand for EU-based products.



Setting EU-wide, harmonised, mandatory and standardised green procurement criteria would also allow private buyers to make more informed decisions about the products they purchase. With the cost of solar technology expected to become even more competitive in the future, end-users and other stakeholders are increasingly looking at non-price considerations for their decisions. Further, GPP criteria could be also applied as non-price criteria in solar auctions, which is one of the main instruments for member states to drive their national PV markets and reach their 2030 targets. Importantly, a GPP measure should not weaken the upcoming mandatory instruments, which should be set at a level of ambition that is appropriate to their goals.

Based on these considerations, the signatories of this letter ask the EU Commission to treat Green Public Procurement for solar PV products as a high priority and to fast-track the establishment of such criteria to support a sustainable and future-proof deployment of solar energy and a thriving EU industry. To this end, we remain committed to engage in the policy discussion to ensure that GPP criteria are reliable, science-based, commonly understood and widely accepted by all stakeholders.

Yours sincerely,

La Asociación de Empresas de Energías Renovables
(APPA)



Climate Action Network (CAN) Europe



Dutch Public Buyers Club for Sustainable PV

Environmental Coalition on Standards (ECOS)



European Solar Manufacturing Council



The European Technology and Innovation Platform
for Photovoltaics (ETIP PV)



Italia Solare





The International Thin-Film Solar Industry
Association (PVThin)



SolarPower Europe



Svensk Solenergi



Swissolar

