Joint Mission Group's high-level feedback ahead of Consultation Forum

The Joint Mission Group, representing solar PV sector associations in Europe and bringing together solar industry experts and researchers, highlights the following overall recommendations on the proposed Ecodesign and Energy Label policy measures for solar PV products. We hope that the feedback provided below helps steer the stakeholder discussion taking place during the Consultation Forum and supports the set up of strong and future-proof sustainable product policies for solar PV technologies in the EU. The below listed points are agreed upon among the Joint Mission Group. However, regarding the proposed carbon footprint methodology and a number of additional topics there is not consensus among these organizations and separate bilateral feedback will be sent.

1. On the **Ecodesign** policy proposal,

We **oppose** the following points**:**

- Inappropriate or irrelevant **PV inverter requirements that have been based on PV module requirements** (Annex II para 6). This includes e.g. material content requirements. Module-specific substances for inverters should be deleted;
- Unrealistic **inverter spare parts requirements** (Annex II para 4.1). In particular, temporal requirements on spare parts availability, spare parts delivery and access to information are inappropriate;
- Approach towards **inverter disassembly requirements** (Annex II, para 4.1). Inverters cannot be repaired by other than experts; failing to do so would create relevant safety-related issues. Reference to repair and replacement by non-experts/generalists shall be avoided.

We **caution against** the following items:

- **Missing grace period** for requirements to enter into force (Annex II);
- **Practicality of repairability requirements** needs to be reviewed, especially in relation to access to junction box (Annex II, para 3-6);
- **Risk of circumvention/double counting** in carbon footprint declarations & **enforcement challenges** in ensuring correct and plant-specific carbon footprint data usage (Annex IV); we recommend looking at the French CRE tenders experience to better understand the challenges of verification processes;
- **Cumbersome level of detail in quality control of production processes**, including in-person audits at supplier level (Annex V); administrative and cost burdens must be carefully evaluated, especially for smaller producers;
- **Significant risk of non-compliant products** entering the EU without a strong verification process and clear conformity assessment/rating procedures.

In addition, we ask to **clarify**:

- Whether the **requirements listed in Annex V are considered representative** of current widely used quality/design for reliability audit standards in today's PV industry;
- What actions will be taken to **ensure a reliable and well-functioning verification system** (Annex V);
- Whether there are **any best practice examples of manufacturing audits or verification practices** that could be referred to in Annex V;
- The **planned activities and expected timeline** with regard to the initial proposal to introduce **Green Public Procurement measures for PV products**, as a complementary policy tool identifying best performing products to accompany the minimum sustainability requirements sets through Ecodesign and Energy Label.

2. On the **Energy Label** policy proposal,

We **support** the removal of the Energy Labeling requirement for residential PV systems, which is very complex to implement in practice;

We **caution against** the following items:

- Application of **Energy Label to all PV modules regardless of segment**, which brings a risk of unnecessary, burdensome and costly labelling of B2B products;
- Approach of **applying energy labels to energy generating products**, which sends a contradicting message to end-users and would lead to worrying misunderstandings on the contribution of low-scoring PV products in curbing climate change;
- The practical challenges **of sticking and unsticking the Energy Label to modules, especially bifacial modules**, and their associated costs.

In light of the previous points, we **recommend** **re-evaluating the usefulness and applicability of the Energy Label to PV products** and considering simpler approaches to help end-users understand PV energy performance. This could for example become a requirement to include information on EEI_M under standard test conditions against a benchmark representative of current market averages.