



**ESMC's recommendations for resilience and sustainability criteria to auctions
and public procurements of solar PV modules**

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GENERAL RECOMMENDATIONS

- Application of resilience and sustainability criteria as soon as possible.
- Resilience and sustainability criteria as pre-qualification criteria and award criteria
- Application of criteria should aligns with the progression of European PV production



RESILIENCE CRITERIA

Eligibility criteria and resilience bonus – made in Europe : A bonus based on number of steps in solar supply chain completed in Europe.

Resilience bonuses proposed in:

- **Italy**, financial credit to EU made modules (March 2024, RRP)
- **Austria**, “Made in Europe” June 2024, subsidy up to 20% depending on number of European components, Austrian Renewable Energy Expansion Act (EAG)

RESILIENCE CRITERIA

Exclusion of countries with >50% market share

- Exclude products from countries with more than 50% of the European market; i.e. China.
- NZIA “single source” dependency : production not only from within the third country’s borders but also that produced outside of its national borders
- Can be used in dedicated procurement, tender, or support schemes.
- Level of dependency should be defined by the Commission.



SUSTAINABILITY CRITERIA

- Carbon footprint criteria with upper threshold; robust calculation needed. FR, NL, EPEAT to avoid any reliance on individual declarations by producers
- Compliance with EU environmental legislation (REACH, WEEE, RoHS etc).
- Content specifications; no PFAS in backsheet, no antimony.
- Recycling criterion in compliance with CENELEC standards EN50625-2-4 and TS50625-3-5.



SUSTAINABILITY CRITERIA

- No to forced labour made product. Leverage from the database on risk products and areas before the FLR is enforced.
- Compliance with existing international texts :
 - Charter of Fundamental Rights of the European Union
 - European Convention on Human Rights.
 - United Nations International Covenant on Civil and Political Rights (ICCPR).
 - EU Global Human Rights Sanction Regime (ban or penalize equipment from countries for which the EU has imposed sanctions for human rights violations)



RESILIENCE CRITERIA

Traceability and access so data

- Traceability and access to reliable and verified data is essential for fulfilling the intentions in NZIA.
- Data exists but needs to be collected and centralized to databases beyond country and company borders. Relevant data should be open and accessible to all.
- PV Passport (with unique barcode) with all details of the modules and other components used in Europe.



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