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Contact for inquiries: holm@esmc.solar

Solar Stewardship Initiative (SSI) Supply Chain Traceability Standard: ESMC's input

The Solar Stewardship Initiative (SSI) has introduced its Supply Chain Traceability “Standard”, aiming to enhance traceability within the solar value chain. Since SSI has asked the public for feedback on this document, we the European Solar Manufacturing Council would like to on behalf of our members forward this input from the European manufacturing industry.

Previously, we expressed concerns about the Solar Stewardship Initiative as an inadequate mechanism for ensuring a sustainable value chain for the solar PV industry. We were informed that many of our concerns would be addressed with this new standard. However, we believe this is not the case. We refer to our previous statement. Dated April 9th, 2024, titled "[ESMC does not recommend participation in the Solar Stewardship Initiative](#)", as our general feedback on SSI and its core documents.

Specific comment on the Supply Chain Traceability Standard

Lack of guidance on Forced Labour or Human Rights

The current “standard” has limited its scope to silicon, with plans to expand to other materials in the future. While we agree that this initial focus is pragmatic — given that metallurgical-grade silicon and polysilicon are critical components in all crystalline silicon solar panels — we are deeply concerned that the standard lacks guidance on human right issues, particularly state-imposed forced labour.

A significant portion of the world's silicon used in the solar PV supply chain comes from China, specifically the Xinjiang region, where severe human rights violations are a well-documented fact. The Chinese government continues to engage in systematic oppression of approximately 10 million Uyghurs and other Turkic and Muslim communities in the region.

Given this context, it is both disappointing and alarming that the standard does not provide guidance for European companies on how to navigate sourcing from China. We expected comprehensive instructions on how to avoid sourcing from regions where there is a high risk of human rights violations, particularly state-imposed forced labour where companies lack the leverage to remediate impacts and bring forced labour to an end.

Although the FAQ on the SSI webpage states: “The SSI does not certify sites complicit in forced labour. This is embedded in the SSI ESG Standard and Assurance Manual, and will be further reinforced by the forthcoming SSI Traceability Standard.” [our underscoring]; this position is not reinforced in the new traceability standard. Despite this commitment, the new traceability standard does not offer further guidance on the issue of forced labour and continue to create uncertainty regarding this critical issue in the PV supply chain. The reality is that many of the SSI's manufacturing members have alleged ties to Xinjiang, according to reports by Sheffield Hallam

University and the Business and Human Rights Resource Centre, which suggests the SSI does not conduct very thorough due diligence on its own members.

We strongly believe that a clear and unequivocal rejection of all business relationships with companies linked to Xinjiang should be a baseline requirement in the standard. This is also the position taken by [the European Solar PV Industry Alliance](#) and [by ESMC](#). Therefore, we find it highly unsatisfactory that the current standard does not take a clear stance and gives no guidance in this matter. This baseline requirement should also extend to “SSI certified suppliers,” who should also be expected to comply with the SSI’s ESG standard at a very minimum, otherwise SSI “certification” is meaningless and misleading.

Certifying Two sites is insufficient

We also maintain that certifying only two sites should be insufficient for SSI membership eligibility. This approach allows an SSI member to selectively certify certain facilities under the SSI system while excluding others that might be more problematic or impossible to assess. As a result, Chinese solar corporations could use the SSI certification as a greenwashing tool, certifying two compliant sites while leaving other potentially problematic facilities unaddressed, here violations of labour and human rights, including forced labour, may still be occurring — unchecked. Similarly, the SSI Supply Chain Traceability Standard will only verify where the materials for a particular production site comes from, allowing SSI members to continue sourcing from regions with state-imposed forced labour at their other uncertified sites.

Additionally, it is frustrating that SSI repeatedly has changed its documents. For instance, the sentence “Participants remain free to operate other facilities or offer other products which do not comply with the standards mentioned SSI’s Code” was previously included in the anti-trust statement. Now, it has been removed, which we strongly welcome. However, the requirement that certifying only two facilities is sufficient to become SSI member is still the criteria mentioned in the ESG standard.¹ This creates uncertainty about the requirements for membership and which of a company’s supply chains that actually will be scrutinized. We believe that a credible standard must cover all supply chains at all manufacturing sites

Nonconformity guidelines are unclear

The standard lacks clarity regarding how to address nonconformity with its key requirements. While the standard aspires to an “unbroken chain of custody”, it is unclear how uncertainties or gaps in the supply chain should be handled. How many gaps are permissible before SSI certification is compromised? The standard does not provide clear guidance on this issue, which needs to be clarified. The traceability standard claims it will “allow stakeholders to be confident that the silicon used in the solar modules was produced responsibly,” however, it fails to sufficiently address how it can ensure that the mixing of certified and non-certified silicon will not occur at a site when polysilicon blending is common in the industry. This is precisely why the SSI

¹ In the ESG code under “Application”: “SSI Manufacturing Members are required to achieve SSI Standard Certification against applicable requirements for at least two of the Member’s Sites within one year of joining SSI. And at 3.4: “Where applicable, complete an assessment against the SSI Standard for at least two (2) production sites (where applicable) within twelve (12) months of signing this document and commit to continuously expand this scope to more Sites.”

should require its members to avoid sourcing from suppliers with ties to regions with state-sponsored forced labour.

Not a standard

To be considered a “standard,” it should be developed by a recognized standards-setting body with a multi-stakeholder group of experts.

As the members of the SSI mainly consists of Chinese manufacturers and European developers, which can both profit from weak standards and verification processes, the ambitions for robust requirements from the members can be questioned. To our knowledge, no European manufacturers are satisfied with the proposed requirements.

FAQ and core documents are not aligned

Since its inception, we have closely followed the development of the SSI, including the introduction of the Supply Chain Traceability Standard and the evolving FAQ throughout 2024. However, the FAQ is not part of the core SSI documents, leaving its official status is to some degree unclear.

There are noticeable gaps between what the FAQ states and what is in the core documents. For example, the FAQ added a question in spring 2024 which states: “Will the SSI conduct audits in Xinjiang?” with a clear “no” as the answer. Similarly, the FAQ suggests that non-conformity results in loss of SSI membership. However, these positions are not reflected in the core documents.

We consider this discrepancy a significant oversight. For an initiative that claims to improve transparency and traceability in a China-dominated supply chain — where forced labour and human rights abuses are still widespread — there must be absolute clarity. This includes a firm commitment to eliminating all unethical practices from the solar supply chain and ensuring that Chinese suppliers are not portrayed more favourably than they truly are. The SSI and its Supply Chain Traceability Standard, in their current forms, still fall short in this regard. Industry buy-in for an initiative should not come at the expense of more rigorous and credible social audits that can better identify potential signs of forced labour in the supply chain. We maintain that the solar industry should leverage established social auditing frameworks with a track record of identifying and remedying human rights violations rather than creating its own “standards” which risk not being effective, or worse, risk providing cover for unethical practices.

Conclusion

In summary, while the Solar Stewardship Initiative’s Supply Chain Traceability Standard claims to represent a step towards greater transparency in the solar value chain, it falls short in addressing critical issues such as forced labour, human rights violations, and the integrity of its certification process. Without clear guidance on these matters, particularly regarding sourcing from high-risk regions like Xinjiang, and more stringent requirements for certification, the initiative risks enabling greenwashing rather than fostering genuine accountability. We urge SSI to take stronger

and more decisive actions to ensure a truly sustainable and ethical solar PV supply chain, aligned with global human rights standards.

Adopted by European Solar Manufacturing Council, Working group on sustainable solar PV supply chains, 18th October 2024.