

Environmental Footprint Task Force

SolarPower Europe

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3 May 2018, Quality and Sustainability
of PV Systems



Structure of the presentation

1. SolarPower Europe's Environmental Footprint Task Force
2. What are the EU „sustainable product policies“?
3. Timeline and regulatory process
4. SolarPower Europe's considerations

1

SolarPower Europe's Environmental Footprint Task Force

Members, objectives, deliverables

Members of the Task Force



Activities of the Task Force

Past activities

- Product Environmental Footprint Category Rules / Screening Report
- NSF 457 Sustainability Leadership Standard for PV modules
- Monitoring and input to EU legislation: WEEE, RoHS, REACH

Current activities

- EC / JRC Preparatory study on sustainable product policies for PV modules, inverters and systems
- Sustainability factsheets: to be published in Q2 / 2018

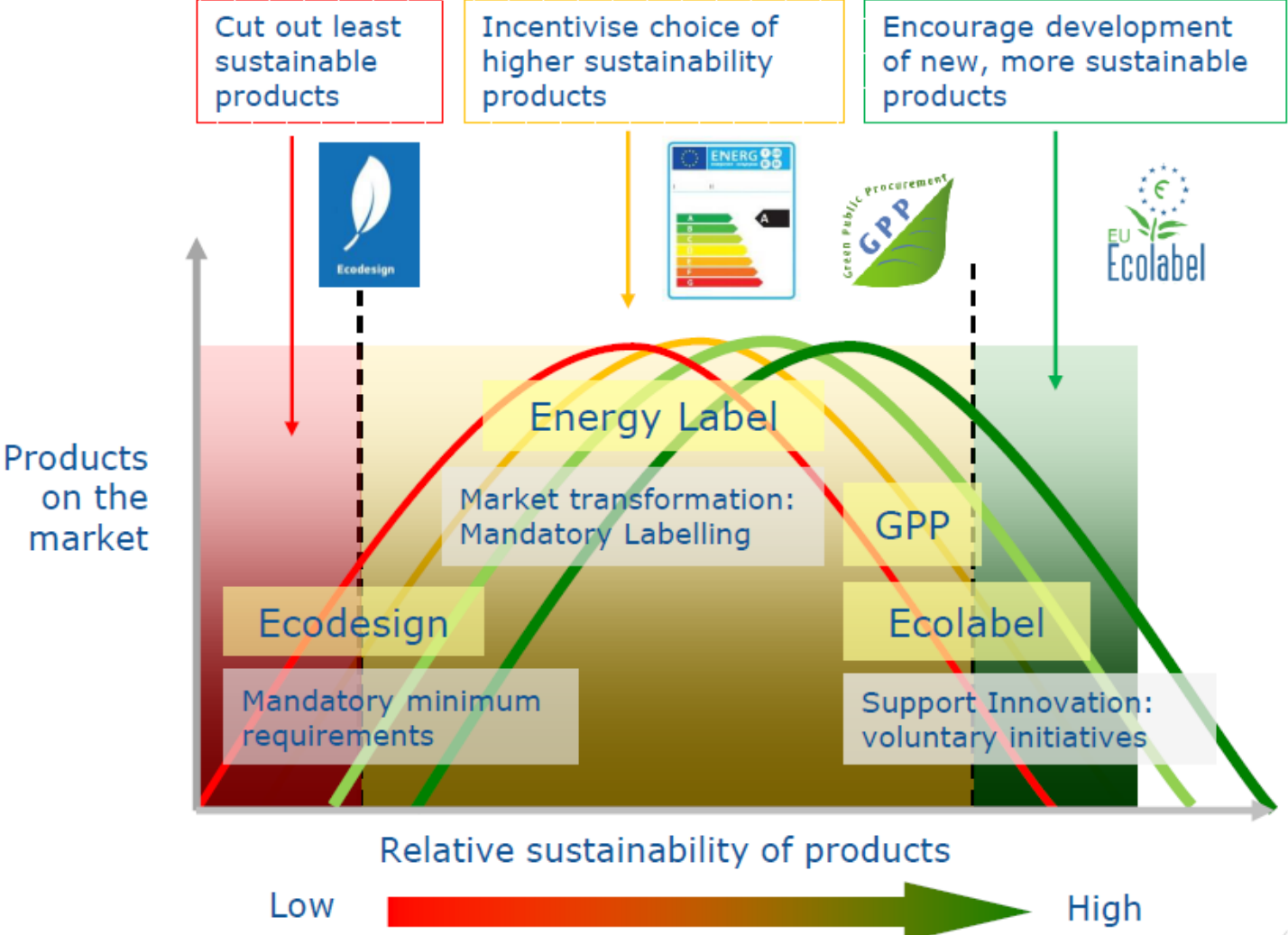
2

The EU's

Sustainable product policy instruments

Ecodesign, Energy Labelling, Ecolabel,
GPP

Overlay of EU product policy instruments



3

Sustainable product policy instruments Timeline

Preparatory study, stakeholder consultation, MEERp methodology, regulatory process

Timeline

Inclusion of PV panels and inverters in the Ecodesign Working Plan 2016-2019

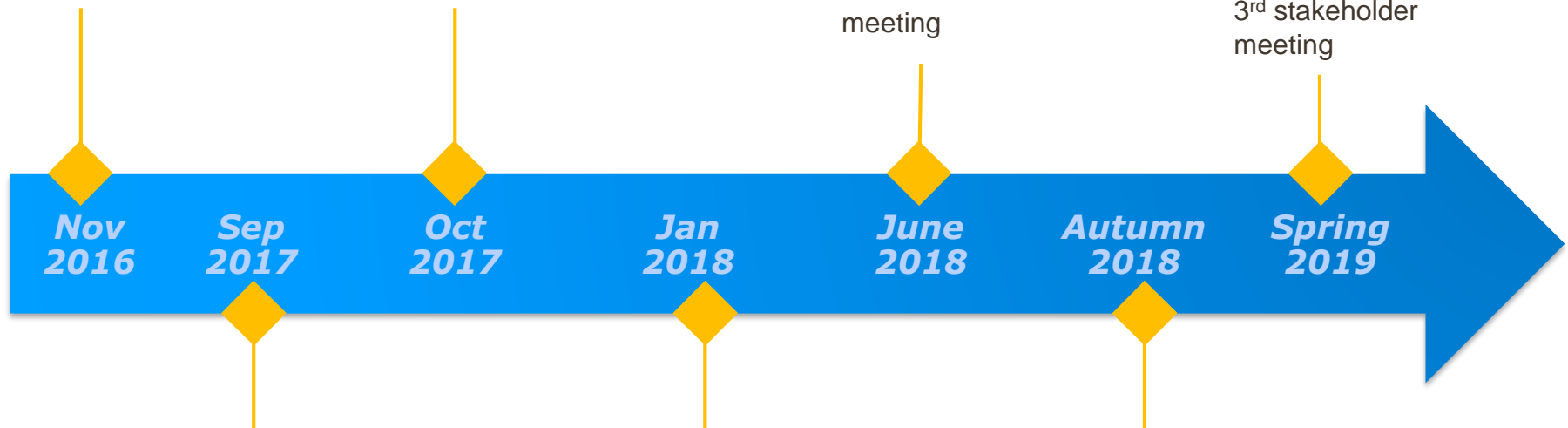
Launch of the preparatory study by JRC

- Activities**
- Scope definition
 - Market analysis
 - Standards and measurement
 - User behaviour and systems

- Activities**
- BAT and LLCC assessment
 - Long term BNAT analysis
 - Ecolabel/GPP improvement potential and verification
 - Policy scenario analysis

1st stakeholder meeting

3rd stakeholder meeting



Finalisation of the SolarPower Europe Input Paper

JRC Scoping survey

2nd stakeholder meeting

- Activities**
- Product description
 - Bill of Materials
 - Lifetime/EoL
 - Base case definition
 - MEErP LCA and LCC assessment

Timeline (Preparatory study and regulatory process)



Joint preparatory study
on the feasibility to apply
EU sustainable product
policies to PV modules,
inverters and systems
(**carried out by the JRC**)



October 2017

18 months

Separate regulatory processes

Summer 2019

Faster - according to DG ENV

Ad-Hoc Working Group (Consortium + COM) drafts EU Ecolabel criteria according to the results of the preparatory work (feasibility, environmental and market studies, improvement analysis, LCA)

Circulation of EUEB approved draft among relevant COM services for approval

Vote from Regulatory Ct'e of National Authorities

COM Decision on Criteria => Comitology Process

Publication of Criteria Catalogue in OJ => open for application

2

Draft measures (i.e. the draft of the future eco-design regulation) presented by the Commission

3

Consultation with Member States and industry

4

Impact Assessment launched by the Commission

5

Regulatory Scrutiny Board of the Commission consulted

6

WTO consulted

7

Draft Regulation submitted to the vote of the Ecodesign Committee

8

Scrutiny period for EP and Council / Adoption / Entry into force

UP TO 2 YEARS

MEErP+ methodology overlay



Task 1: Scope	✓	✓	<ul style="list-style-type: none"> Existing labels and certifications 	<ul style="list-style-type: none"> Existing national criteria May include services
Task 2: Market	✓	✓	<ul style="list-style-type: none"> Front runner and niche characterisation 	<ul style="list-style-type: none"> Procurement options and routes
Task 3: Users	✓	✓	<ul style="list-style-type: none"> Installations of systems for households 	<ul style="list-style-type: none"> Identification of specific end-uses
Task 4: Technology	✓	✓	<ul style="list-style-type: none"> Screening of hazardous substances Other non-LCA aspects 	<ul style="list-style-type: none"> Service and installation aspects
Task 5: LCA/LCC	✓	✓	<ul style="list-style-type: none"> Screening of existing LCA studies Other impact categories 	<ul style="list-style-type: none"> Life cycle cost is important focus
Task 6: Design options	✓	✓	<ul style="list-style-type: none"> Front runner improvement options Tests and standards 	<ul style="list-style-type: none"> Front runner improvement options Tests and standards
Task 7: Scenarios	✓	✓	<ul style="list-style-type: none"> Identification of possible criteria areas 	<ul style="list-style-type: none"> Identification of possible criteria areas
Task 8: Analysis	✓			
Task 9: Preparatory work	✓	✓	<ul style="list-style-type: none"> Technical report with first criteria proposals 	<ul style="list-style-type: none"> Technical report with first criteria proposals

4

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Considerations and recommendations

Input Paper, Scoping survey

Key recommendations of the SolarPower Europe Input Paper for the JRC Preparatory study:

- 1) **Ensure synergy** between the different sustainable product policies such as Ecodesign and Ecolabel to be evaluated in the preparatory study
- 2) **Consider the complexity of the EU electricity system** and the relations between curtailment, grid services and product sustainability.
- 3) **Take into account sustainable product policies' implications for industrial policy** and that new policies should not affect negatively the solar industry in Europe.
- 4) **Ensure technology neutrality** and consider Articles 6.6 and 6.7 of the Ecolabel Regulation at the beginning of the preparatory study.
- 5) The preparatory study, the regulatory process, as well as potential future sustainable product policy(ies) should **keep pace with the progress of technology**.
- 6) Policies should **create results that go beyond “business-as-usual”** in terms of enhancing product environmental and material efficiency and creating business opportunities.
- 7) The preparatory study **analysis should be carried out on the level of the PV system**. Although the preparatory study analysis should be carried out on the PV system level, a possible outcome of the study could still be a recommendation to implement measures on component level.
- 8) **Draw on the experience of comparable product groups** with sustainable product policies.
- 9) Take into account and **draw on related directives, standards and initiatives**.

SolarPower Europe's points regarding PV panels

- only the intended end-use should be considered in determining the scope, only stationary and non-movable applications, no other aspects such as size, power output or number of cells
- BIPV should not be included
- Questions regarding commercial state of the art
- Most important environmental parameters when communicating to consumers (Power conversion efficiency, EPBT, EROI)
- Initiatives similar to Ecolabel (e.g. NSF 457 SLS), Ecodesign, GPP

Similar sets of questions regarding inverters and PV systems

Thank you!

To join the Environmental Footprint Task Force contact:

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CE

Energy label

