



# Follow up study on Photovoltaic products: ongoing work on potential Ecodesign and Energy Labelling measures

Stakeholders webinar  
29 April 2021

***DG GROW***

***JRC***

**European Commission**



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- Only audio connections, no video
- Everyone remains muted (unless speaking when invited by the Chair)
- At each Q&A sessions, signal by raising you hand, if you would like to speak
- Concise intervention or question, in order to allow time for anyone to intervene

NB 1: This meeting is **recorded** for drafting the minutes. Please indicate in the chat if you oppose to this.

NB 2: The chats will not be kept/copied. Please do not make comments in the chat area unless invited by the Chair.

# Agenda

- **Welcome**
- **Walk through the policy recommendations for new requirements under Ecodesign and Energy Labelling Directives**
- **Concluding remarks and the next steps**



# Project team

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# Project timing

**April 29<sup>th</sup>: Stakeholders workshop**  
*Proposed requirements*

**October:  
Consultation Forum**

**Impact Assessment  
Regulatory Scrutiny  
board**

**Regulatory  
Committee**

Draft legal proposal

Draft impact assessment

2021

2022



# Requirements/labelling under preparation

Regulatory approaches (in line with the prep study findings) under prep.:

- Some of the Ecodesign requirements hereby presented are 'traditional' (on energy efficiency, durability or material efficiency)
- There are two categories of requirements/conformity assessment procedures that were never enacted so far within Ecodesign measures, namely on:
  - ❑ information regarding the environmental footprint ('ecological profile' as per the definitions laid down in the Ecodesign Directive 2009/125) of the manufacturing phase of PV modules and inverters;
  - ❑ the quality control of the manufacturing process of PV modules and inverters.
- Energy Labelling schemes for PV modules and systems: energy generating products

# Requirements/labelling under preparation

## ECODESIGN

### PV modules

- Energy yield (info/quantitative)
- Durability
- Quality assurance of the production process
- Performance long-term degradation
- Repairability
- Recyclability
- Ecological profile

### PV inverters

- Efficiency (quantitative)
- Durability
- (Quality assurance of the production process )
- Smart readiness
- Repairability
- Recyclability
- (Ecological profile)

## ENERGY LABEL

- PV modules
- PV systems (installation)

# Products scope

***individual PV modules that are placed on the EU market and intended for use in PV systems for grid-connected electricity generation***

## *Scope exclusions*

- Modules with a DC output power of less than 50 Watts under Standard Test Conditions (STC)
- Building integrated photovoltaics (BIPV)..but BAPV in scope
- PV module designs integrated into consumer electronic products, or other multifunctional applications requiring specialised designs for which energy production is not the only purpose/functionality e.g. street furniture, large-area shading, specific agri-PV applications or other similar.

## *Special consideration for:*

- modules containing integrated or embedded micro-inverters (compliance before integration)
- new technologies entering the market, with scope for rapidly increasing efficiency or demonstrating long-term reliability, with the aim of not dissuading innovation



# Products scope

*individual PV inverters that are placed on the EU market and intended for use in PV systems for grid-connected electricity generation*

## *Scope exclusions*

- *Central inverters that are packaged with transformers (sometimes referred to as central solutions) as defined in Commission Regulation (EU) No 548/2014 on Ecodesign requirements for small, medium and large power transformers.*



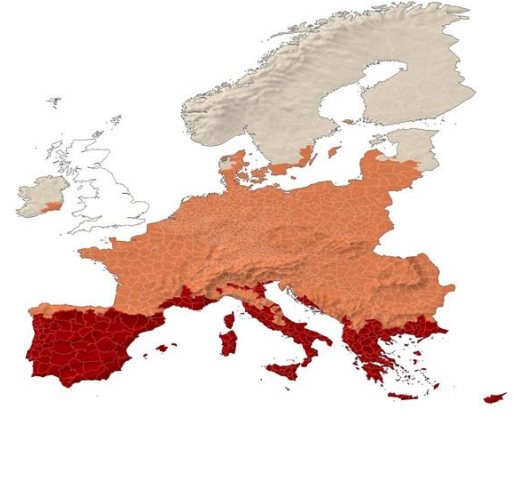
# QUESTIONS?



# REQUIREMENTS FOR PV MODULES

# PV module energy yield

- Calculated according to EN IEC 61853-3 methodology for the climatic conditions of EN IEC 61853-4 relevant in Europe ("Temperate coastal", "Temperate continental" and "Subtropical arid")
- Fixed configuration: ground mounted, South facing, 20° inclined
- Energy Label based on energy efficiency index: ratio of energy yield and PV module area (kWh/m<sup>2</sup>)
  - Input data: P<sub>stc</sub> (W), module area (m<sup>2</sup>), CSER (EN IEC 61853-3)
- Transitional method necessary for bifacial PV modules. (EN IEC 61853 cannot be applied directly)



# Requirement on durability

Design qualification for long-term operation	From XX YY 20ZZ, manufacturers, importers or authorised representatives shall ensure that PV modules are capable to withstand prolonged exposure in open-air climates, in line with the following functional requirements:
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- **Relevance of this module feature -> module in operations for ~30years**
- **Quality of the production process for PV modules is of paramount importance for ensuring the actual durability of all modules placed on the market (and thereby their conformity with the requirement).**



**A 'dual' approach is proposed**

# Requirement on durability

A 'dual' approach is proposed

- **Compliance with a testing method (in line with the EN IEC 61215 series) that involves subjecting 10 modules to the relevant tests (outdoor exp, hotspots, damp heat, hail..).**
- **Enhance the standard conformity assessment modules set out in the Ecodesign Directive by requiring manufacturers to additionally have a third-party verified quality assurance system in place.**

# Quality and degradation: EN IEC 61215

Standard	Subject covered
EN IEC 61215-1	Design qualification and type approval - Part 1: Test requirements
EN IEC 61215-2	Design qualification and type approval - Part 2: Test procedures
EN IEC 61215-1-1 to -4	Specific requirement for each PV technology

## Specific tests covered:

- *Thermal cycle test*, with temperature and electrical current as stressors;
- *Damp heat test*, combination of effects due to temperature and humidity;
- *Humidity freeze test*, on sealing materials and components;
- *UV test*, for polymeric components;
- *Static mechanical load test* simulates loads such as those by constant wind or homogeneous snow accumulation;
- *Hot spot test* linked to partial shading on modules;
- *Hail test*.

# Quality assurance of the production process

**Deviations from the expected production quality easily cause defects that**

- **are not detected in standard product tests; and**
- **undermine product's resistance to the environmental stressors covered by the proposed durability requirement.**

**Article 8(2) of the Ecodesign Directive foresees the possibility to take account of such specificities by adapting the relevant conformity assessment procedure.**



# Quality assurance of the production process

It is proposed to:

**Use module D1 of Decision 768/2008/EC = internal production control + quality system approved by a 'notified body':**

- initial on-site audit of quality system
- subsequent surveillance (periodic audits + unexpected visits)

**Base the procedure and requirements for the quality system on IEC TS 62941, e.g. the system should include:**

- evaluation of the quality performance of key materials
  - ongoing production monitoring program that uses appropriate tests for the known failure mechanisms of the product
- > to be further adapted and specified**



# Requirement on Performance long-term degradation

- Information requirement
- The manufacturer shall optionally declare the average linear degradation rate expected over a notional service lifetime of 30 years, following a specific procedure (5 year of measurements needed)
- In absence of declaration, default values to be used
- The degradation rate is used in the energy label of systems
- Ongoing preparation on standard methods to simulate long term exposure could help (but it will probably take long time to develop it)

# Requirement on repairability & dissasemblability

- **Information requirement**
- **The manufacturer shall declare on**  
the possibility to access and replace the bypass diodes in the junction box,  
the possibility to replace the whole junction box of the module.
- **Ensure that modules are possible to disassemble in order to facilitate  
repairing.**

# Requirement on recyclability

- **Information requirement**
- **The manufacturers shall report on the potential to separate and recover the semi-conductor, the frame, glass, encapsulants and backsheet.**
  - **Design measures to prevent breakage and enable a clean separation of the glass, contacts and internal layers during the operations shall be detailed.**
- **The manufacturer shall declare the content in grams of the following critical raw materials and environmentally relevant materials**
  - Lead
  - Cadmium
  - Silicon metal
  - Silver
  - Indium
  - Backsheet fluorinated additives
  - Gallium
  - Tellurium
  - Metal solder and contacts
  - Glass fining agents
  - Phthalates in power cables



# QUESTIONS?

# Requirement on ecological profile

- (from the prep study): high relevance of the production phase of PV modules on the overall environmental impacts
- Some MS (IT, FR, ES) introduced PP schemes for PV modules requiring inter alia information – and even quantitative – requirements on the products' environmental footprint / ecological profile
- Manufacturers advocated for this kind of requirement
- Never enacted so far within Ecodesign measures, but Ecodesign Directive foresees req. on the 'ecological profile'
- The ecological profile assessment would focus solely on impacts occurring during the raw material selection and manufacturing phase, with a focus on GWP and, possibly, on the energy consumption

# Requirement on ecological profile

- Need for clear harmonised rules and assumptions for modelling and calculation
- Product Environmental Footprint Category Rules (PEFCRs) are available for PV modules→ this would be the reference methodology
- The current proposal is a regulatory solution targeted to specific products (PV modules) and policy commitments (the reduction of PV modules manufacturing env. impact), under the current Ecodesign Directive
- No prejudice – rather synergy – to the outcomes of Green Claims/SPI, much broader in terms of scope and impacts coverage.
- Tool in support to the ecological profile declaration an adapted/tailored version of the new EcoReport tool (new: from the MEErP review study)
- Regulatory approach has been sketched out (inspired by Batteries proposal)



# Requirement on ecological profile

- The harmonised calculation rules shall build on the latest version of the Commission PEF method and relevant PEFCRs
- The system boundary is applied to the manufacturing stage, that is raw material acquisition and main product production
- The 'climate change' life cycle impact assessment method expressed in kg of CO<sub>2</sub> per kWh produced by the PV product
- Use of company specific data. These could be limited to:  
[List of processes and components for which company-specific data is to be used. Including the most relevant raw materials and production processes in terms of impacts]

# Requirement on ecological profile (legal)

Annex I Part 3 foresees a requirement to draw up an ecological profile, defined as:

'a description, in accordance with the implementing measure applicable to the product, of the inputs and outputs associated with a product throughout its life cycle which are significant from the point of view of its environmental impact [...]'

Annex I Part 1 lists the relevant life cycle phases and parameters:

- raw material selection + manufacturing phase
- GHG emissions (and possible energy consumption)

Harmonised calculation rules set out in implementing measure

Declaration based on Article 14(b) or Annex I Part 2(b)

## Requirement on ecological profile (legal)

Normally MSAs can verify compliance with applicable requirements directly on the product, i.e. by testing individual products.

This does not hold for verification of the reliability of the ecological profile declaration (especially for company-specific data).

Article 8(2) of the Ecodesign Directive foresees the possibility to take account of such specificities by adapting the conformity assessment procedure.

Procedure proposed (to be worked out further):

- Use module A1 of Decision 768/2008/EC = internal production control + reliability of ecological profile verified by a 'notified body'
- Reliability of company-specific data to be checked on-site
- Allow use of supplier-specific data if in line with harmonised calculation rules and verified by notified body



# Potential Timing

**(ongoing) update of general Ecoreport tool**

**Ecoreport tool for PV Ecol.prof.**

**Technical work on ecological profile**

**Tech. work on ecological profile (ctd)**

**Legal work on ecological profile**

**Legal work on ecological profile (ctd)**

**Oct – CF mtg**

**Reg. Comm.**

**Draft legal proposal**

**(final) legal proposal**

**Draft impact assessment**

2021

2022

29



# QUESTIONS?



# REQUIREMENTS FOR PV INVERTERS

# Requirement on Performance (efficiency)

- **Mandatory requirement – minimum threshold, distinguishing PV inverters with/without storage**
- **The manufacturer shall declare the temperature derating factor**
- **Input for Energy Label calculation**
- **Excel calculation tool considers default/field data**
- **The manufacturer shall ensure that the inverter supports a monitoring system and transfer protocol**



# Input requirements for EEI estimation and PV System classification

## Inverter:

- Microinverter (Y/N)
- AC rated power (kW)
- *Euroefficiency* (%) (EN 50530)
- Temperature derating factor (%)
  - Proposed method based on declared temperature threshold above which derating occurs and inverter installation environment (EN 50524)
  - EN IEC 61853-4 temperature profile

# Requirement smart readiness

- **Mandatory requirements**
- **The inverter shall have physical connectivity with other devices using an open standard data transfer protocol.**
- **Information shall be proved on cybersecurity and demand response management capabilities.**
- **Inverters used in PV plants > 40MW shall support class B data monitoring according to IEC 61724-1**

# Requirement reparability

- **Information requirements**
- **Repairable/spare parts - 2019 Regulations**
  - all electronic/electromechanical components of the inverter available for a minimum period of 15 years
  - at least each individual printed circuit board and disconnectable component provided as spare part\*
  - the delivery must take place within 15 working days.
  - replaced using the tool classes established depending on the size of inverters.
- **Class requirements as established according to the EN 45554:2020, e.g. for inverters above 30 kW\*:**
  - class A for fasteners and connectors, tools and working environment,
  - class B for skill level

\* e.g. installations on residential buildings, small commercial or mixed residential/commercial buildings

# Requirement on material efficiency

- **Information requirements**
- **To promote design for recycling and to facilitate future end of life recovery of valuable raw materials and to identify appropriate recovery routes**
- **The manufacturer shall declare the content in grams of listed materials\* to ease recyclability:**
  - Lead
  - Cadmium
  - Silicon carbide
  - Silver
  - Indium
  - Gallium
  - Tantalum
  - Metal solder and contacts
  - Glass fining agents
  - Phthalates in power cables

# Requirements on quality production process and ecological profile

- The above topics emerged as relevant (in terms of env. impacts) from the preparatory study
- The formulation of these requirements could follow an approach conceptually similar to the one used for PV modules
- The discussion paper is less developed on these topics
- The test on durability would be based on IEC 62093 "Balance-of-system components for photovoltaic systems – Design qualification natural environments"
- The quality assurance system could be based on IEC TS 63157 "Photovoltaic systems - Guidelines for effective quality assurance of power conversion equipment"



# QUESTIONS?



# ENERGY LABELS

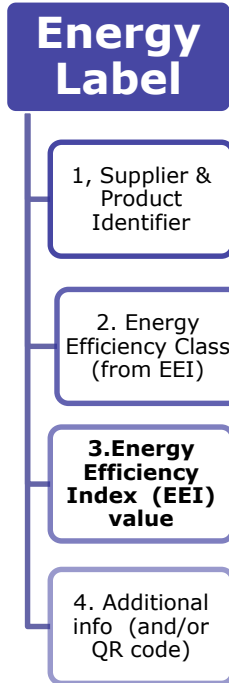
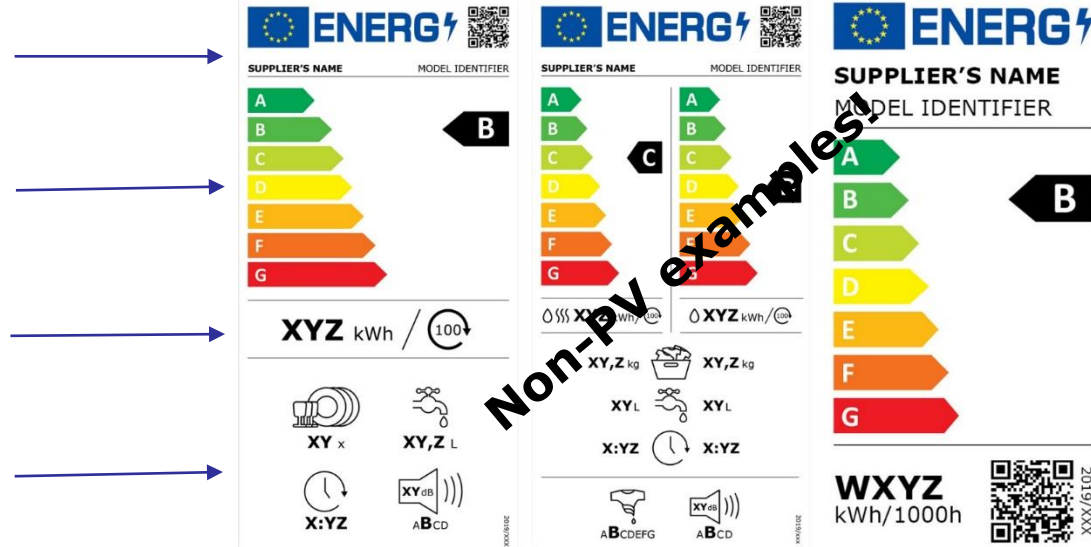
# Proposed energy labelling schemes

- These energy labels are meant to act as tools enabling installers as well as non-professional purchasers to make informed choices based on the energy efficiency of the products/systems
- PV modules and systems are energy generating products; their 'energy efficiency'\* can be conceived to be the ratio of the generated energy available for the final application to the incoming energy (i.e. the amount of solar radiation reaching the module/system)

\*For EuP, the energy efficiency is the ratio between the product performance, and the energy used to obtain it



# Energy Label - Overall Visual Scheme

The diagram shows three examples of Energy Labels, each with an arrow pointing to a specific component of the label scheme:

- Label 1 (Left):** Shows a standard label with energy efficiency class **B** and EEI value **XYZ kWh / 100**. It includes icons for energy consumption (XY x), water consumption (XY,Z L), and sound power level (X:YZ, XYdB). A QR code is present in the bottom right.
- Label 2 (Middle):** Shows a standard label with energy efficiency class **G** and EEI value **XYZ kWh / 100**. It includes icons for energy consumption (XY,Z kg), water consumption (XY L), and sound power level (X:YZ, XYdB). A QR code is present in the bottom right.
- Label 3 (Right):** Shows a standard label with energy efficiency class **B** and EEI value **WXYZ kWh/1000h**. It includes a QR code in the bottom right.

A large diagonal watermark reads "Non-pv examples!".

# Proposed energy labelling schemes

- The first proposed energy label is for PV modules: EEI is the ratio between the annual energy yield (related to the CSER value) and the area of the PV module
- The second proposed energy label is for small (<30KWp\*) systems, i.e. installations (installer label): EEI is the ratio between the lifetime energy yield of the system and the area of the PV array
- The two labels are meant to act in synergy

\*e.g. installations on residential buildings, small commercial or mixed residential /commercial buildings

# Proposed energy labelling schemes

- **Scope of Energy Labelling Regulation --> any 'good or system with an impact on energy consumption during use'**
- **When installed on buildings, PV modules/systems lower their grid energy consumption by providing a direct own source**
- **Even without storage, DSM or net-metering, self-consumption is around 30-40%**
- **Recital 10 explicitly foresees that labels can be drawn up also for 'energy-related products that do not themselves consume energy'**
- **The A-G classes of the proposed labels would correspond to different amounts of cost/energy savings resulting from different module/system yields – allowing consumers to make informed purchasing decision**

# Energy Label – PV Modules



## 1. Supplier/Model Identifier

## 2. Energy Efficiency Class

- A to G based on EEI value

## 3. Energy Efficiency Index Value

- Energy yield in one year per unit area ( $\text{kWh}/\text{m}^2$ )
- Values for 3 EU reference climates
- Based on module power, efficiency and energy rating

## 4. Additional information

- QR link to Ecodesign data
- Other, to be defined

Calculation  
Excel  
available

# PV module energy yield

- Calculated according to EN IEC 61853-3 methodology for the climatic conditions of EN IEC 61853-4 relevant in Europe ("Temperate coastal", "Temperate continental" and "Subtropical arid")
- Fixed configuration: ground mounted, South facing, 20° inclined
- Energy Label based on energy efficiency index: ratio of energy yield and PV module area (kWh/m<sup>2</sup>)
  - Input data: P<sub>stc</sub> (W), module area (m<sup>2</sup>), *CSER* (EN IEC 61853-3)
- Transitional method necessary for bifacial PV modules. (EN IEC 61853 cannot be applied directly)



# PV module energy yield

- Energy label proposal

Energy Label	Module Energy Efficiency Index (kWh/m <sup>2</sup> )		
	Subtropical arid	Temperate coastal	Temperate continental
A	> 566	> 257	> 330
B	[566 - 496)	[257 - 226)	[330 - 291)
C	[496 - 426)	[226 - 195)	[291 - 252)
D	[426 - 356)	[195 - 164)	[252 - 213)
E	[356 - 310)	[164 - 140)	[213 - 182)
F	[310 - 265)	[140 - 117)	[182 - 151)
G	≤ 265	≤ 117	≤ 151

# Energy Label - PV Systems < 30 kWp

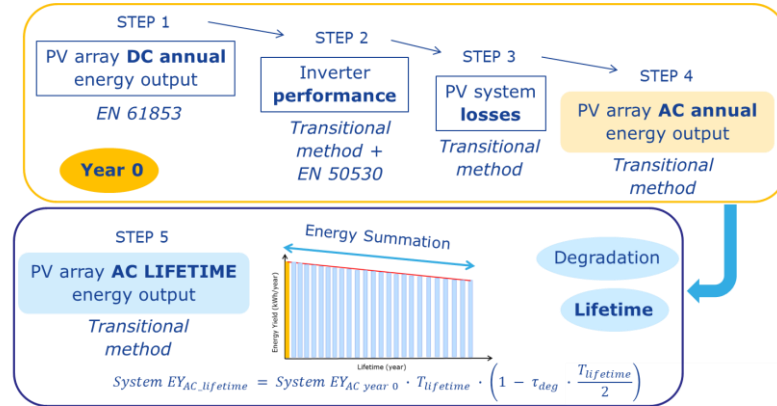


1. **Supplier (Installer) and System Identifier**
2. **Energy Efficiency Class**
  - A to G, based on EEI value
3. **Energy Efficiency Index**
  - Lifetime energy yield per unit array (kWh/m<sup>2</sup>)
  - **Input**
    - Location climate zone
    - System size
    - Module energy rating
    - Inverter efficiency
    - PV array position
    - Losses (degradation, shading, etc.)
4. **Additional information**
  - QR link to Ecodesign data and other (tbd)

Calculation  
Excel  
available

# PV system energy yield

- Transitional method
- Three European reference climates (EN IEC 61853)
- Potential use of location-specific data
- User defined configuration: inclination and orientation
- Energy Label based on energy efficiency index: ratio of energy yield and PV array area (kWh/m<sup>2</sup>)
  - PV module data: P<sub>stc</sub> (W), area (m<sup>2</sup>), CSER (EN IEC 61853-3), degradation (%)
  - Inverter: AC-rated power (kW), Euroefficiency (%), temperature derating factor (%)
  - PV system losses



3<sup>rd</sup> Stakeholder meeting, Brussels 10<sup>th</sup> July 2019



# PV system energy yield

- Energy label proposal

Energy Label	PV System Energy Efficiency Index (kWh/m <sup>2</sup> )		
	Subtropical arid	Temperate coastal	Temperate continental
A	> 13974	> 6388	> 8232
B	[13974 - 11659)	[6388 - 5343)	[8232 - 6899)
C	[11659 - 9345)	[5343 - 4298)	[6899 - 5566)
D	[9345 - 7031)	[4298 - 3253)	[5566 - 4233)
E	[7031 - 6076)	[3253 - 2766)	[4233 - 3589)
F	[6076 - 5122)	[2766 - 2279)	[3589 - 2946)
G	≤ 5122	≤ 2279	≤ 2946



# QUESTIONS?



**THANK YOU FOR YOUR  
ATTENTION!**



# BACK UP SLIDES

# Notified Bodies - Definition

## Notified Bodies

**Conformity assessment bodies (CABs) designated (notified) by Member States** to the Commission and the other Member States which are **authorised to perform specific third-party conformity assessment tasks** as defined in applicable EU harmonisation legislation

# Notified Bodies – Legal Framework

## New Legislative Framework

- **Regulation 765/2008** - common accreditation framework
- **Decision 768/2008 – *Model for future legislation*** harmonising product-related requirements

# Decision 768/2008

- **Common set of conformity assessment procedures (the so-called "**Modules**")**
- **Uniform rules for the designation and supervision of Notified Bodies (NBs)**

# Key Features

**Clear separation of roles** between regulators, standardisers, accreditors, conformity assessment bodies and market surveillance authorities

- **Manufacturers must:**
  - have a technical file, perform a safety assessment
  - follow the applicable conformity assessment procedure (possibly with NB)
  - affix CE marking to the product
  - declare that it complies
  
- **Market surveillance: the government's role is to police the market**



### **III. Key features of the EU Notified Body System**

## Key features of the EU Notified Body System

(Articles R13 – R30 of Annex 1 to Decision 768/2008/EC)

- **Member States take responsibility** for the assessment, designation (notification) of CABs as well as monitoring and supervision of NBs
  - *NBs must be within the jurisdiction of Member States and legally liable to them*
- **Accreditation** as the preferred tool to assess CABs
- **Competition among NBs**
  - *Free to provide their services to any economic operator (inside or outside the EU)*

## Member States' Notifying Authorities

- **Member States take responsibility for Notified Bodies**
- **Member States must designate a notifying authority responsible for:**
  - ***Assessment and Notification of CABs***
  - ***Monitoring and Supervision of Notified Bodies***

# Member States' Notifying Authorities

- **Requirements for notifying authorities**
  - *No conflict of interest with CABs, cannot engage in conformity assessment*
  - *Internal organization must ensure objectivity and impartiality*
  - *Assessment of CABs and decision on notification must be taken by different persons*
  - *Confidentiality*
  - *Sufficient number of competent personnel*
- **Commission to organise exchange of experience between Member States' notifying authorities**

## Notified Bodies - Requirements

- **Established as legal entities under national law of a EU Member State**
  - *Fully liable to the notifying Member State (monitoring, supervision, penalties)*
- **Legal personality**
- **Independence / no conflict of interest**
- **Impartiality and professional integrity**

# Notified Bodies - Requirements

- **Technical competence in relation to the applicable regulatory requirements**
- **Organisational / operational requirements**
  - *Personnel with technical knowledge and sufficient and appropriate experience*
  - *Adequate facilities*
  - *Uniform internal procedures*
  - *Clear distinction between activities as NB and other activities*
  - *Obligation to carry out CA procedures in a non-discriminatory, transparent, proportionate and neutral manner, avoiding unnecessary burdens for economic operators*
  - *Liability insurance*
  - *Professional secrecy*

**=> ACCREDITATION**

## Notified Bodies - Requirements

- **Obligation to cooperate with other NBs via the relevant NB coordination groups established under each Regulation / Directive**

# Notified Bodies

## Subsidiaries and subcontracting

- **Specific tasks can be subcontracted to other CABs (also outside the EU)**
  - *Subsidiaries or third-party subcontractor*
  - *Subcontractors must fulfil the same requirements as NBs*
  - *NBs retain ultimate responsibility for the activities of their sub-contractors and for issuing the required certificates*
  - *Agreement of the client is necessary*



# Notified Bodies

## Accreditation

(Articles 3-14 of Regulation 765/2008/EC)

- **Preferred means for the attestation of the technical competence of CABs**
  - *Last level of public control providing confidence in the conformity assessment system among regulators and the marketplace*

## Notified Bodies - Accreditation

- **Public authority activity**, with formal recognition from government
- **Not-for-profit**
- **No conflict of interest, independence from CABs, no consultancy**
- **1 national accreditation body (NAB) per Member State**
- **CABs must seek accreditation from the national accreditation body of the Member State in which they are established**
  - *Cross-border accreditation possible if e.g. NAB has not developed competence to accredit in a given area*

## Notified Bodies - Accreditation

- **Sets of technical competence + organisational requirements for NABs (=ISO/IEC 17011)**
  - *Including e.g. competent personnel, adequate internal procedures, internal organisation must ensure objectivity and impartiality, decisions on the accreditation attestation to be taken by persons different from those who carried out the assessment*
- **EA (European co-operation for accreditation) as European accreditation infrastructure**
- **Peer evaluation organised by EA (every 4 years)**

## **Notified Bodies – Member States' responsibilities**

- **Monitoring and supervision**
  - This requires full jurisdiction over NBs
  - E.g. including through on-spot visits to NBs, reliance on national accreditation bodies
- **Investigate complaints concerning the activities of NBs**
- **Take any necessary corrective measures, including de-notification if necessary**
- **Levy penalties in case of infringements**

## Notified Bodies – NANDO database

### **NANDO (New Approach Notified and Designated Organisations) website**

- Public website on Europa, for information
- Lists all NBs
- Search criteria: country, legislation, body (number/type), "free search" (key word), withdrawn / expired notifications
- Lists notifying authorities and accreditation bodies