



Industrial Policy for Solar PV

National Implementation and Progress Report

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Industrial Policy for Solar PV

National Implementation and Progress Report

Project lead & main authors:

Anett Ludwig, SolarPower Europe

Internal co-authors:

Dries Acke, Clara Marteau, Henry Grady, Artemis Fakorelli, Christina Huber, Raffaele Rossi & Melicent Rouméas, SolarPower Europe

Internal reviewers:

Walburga Hemetsberger & John Parnell, SolarPower Europe

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For media use and queries:

John Parnell, SolarPower Europe, j.parnell@solarpowereurope.org

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Contact:

info@solarpowereurope.org

Design:

Liam Spiteri, @digitalfrenzyy, digitalfrenzyy@gmail.com

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AOS	Appel d'offres simplifié
CFDs	Contracts for Difference
EAG	Renewable Energy Expansion Act
EEA	European Economic Area
ETS	Emissions Trading System
EU	European Union
FTA	Free Trade Agreement
GPA	Government Procurement Agreement
IAA	Industrial Accelerator Act
IMCO	European Parliament Committee on the Internal Market and Consumer Protection
INTA	European Parliament Committee on International Trade
IRA	Inflation Reduction Act
ITRE	European Parliament Committee on Industry, Research and Energy
MiEU	Made in Europe, colloquial for Union-origin as per Industrial Accelerator Act
NPC	Non-price criteria
NZIA	Net-Zero Industry Act
PLI	Production Linked Incentive
PQ	Pre-qualification
PV	Solar photovoltaics
WTO	World Trade Organisation

This report assesses how EU Member States are beginning to implement the Net-Zero Industry Act (NZIA) resilience criterion for solar photovoltaics (PV), providing an early view of national approaches, emerging design choices, and implications for Europe's manufacturing base.

Solar PV is now a core pillar of the EU energy system, with over 400 GW installed counting for 13% in EU annual average electricity generation.

However, deployment remains heavily dependent on third-country manufacturing. The NZIA seeks to address this by linking solar deployment more closely to economic resilience and supply chain diversification.

Key findings

The report shows that Member States are either piloting resilience criteria, or preparing future auctions that will align more fully with the NZIA.

- Italy demonstrated that the resilience criterion can be implemented at scale with its transitional FER-X auction awarding 1.1 GW of solar PV capacity. In addition, there are several Italian support schemes in place that require EU-made components upfront. It shows an early 'Made in EU' approach through the use of eligibility criterion.
- Austria introduced a 20% 'Made in Europe' bonus and encouraged residential PV and battery storage projects to use European-made PV components.
- France has started implementing NZIA resilience criteria for ground-mounted auctions by requiring key PV components to come from diversified supply chains.
- Ireland is implementing the NZIA through RESS 6 auctions under Article 26, allocating 5% of non-price scoring to resilience criteria.
- Lithuania is implementing Art. 28 NZIA by using higher subsidies to encourage private households to choose high-efficiency PV modules and diversified supply chains.
- Spain is implementing the NZIA mainly through award-based resilience criteria in public support schemes under Article 28.

Overall, the report reveals that Member States are progressing slowly with NZIA implementation, and are using different and diverging approaches. While it is early to assess impacts, it is already apparent that success will require a more consistent and balanced implementation so that industrial policy can leverage the potential of the full EU Single Market. This is also important for the upcoming Industrial Accelerator Act, currently in negotiation, which is expected to strengthen the NZIA framework.

SolarPower Europe will continue monitoring as more national examples will demonstrate the effectiveness, complexities as well as the cost of these new policy frameworks.

01



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Benchmark

Figure 1

Where do Member States stand with the transition of NZIA resilience and early made in EU requirements?

Benchmark		AT	CZ	DE	ES	FR	GR	HR	HU	IE	IT	LT	NL	PL
Resilience and MiEU criteria in public procurement procedures (Art. 25 NZIA)														
Resilience (as per NZIA)	Max 4 components (inverter + cell + module + 1)													
MiEU (as per SPE position on the IAA)	Max 1 component (inverter)													
Resilience and MiEU criteria in auctions to deploy renewable energy sources (Art. 26 NZIA)														
Resilience (as per NZIA)	Max 4 components (inverter + cell + module + 1)													
MiEU (as per SPE position on the IAA)	Max 1 component (inverter)													
Resilience and MiEU criteria in other forms of public support schemes (Art. 28 NZIA)														
Resilience (as per NZIA)	Max 4 components (inverter + cell + module + 1) to access support scheme													
MiEU (as per SPE position on the IAA)	Max 1 component (inverter)													

Colour code

Applied fully in line with benchmark	Applied more strictly	Applied less strictly	Not applied
Fully in line with SPE's position (Max 4 components (inverter + cell + module + 1) preferably applied as award for Public Procurement + Auctions; MiEU Max 1 component (inverter) preferably applied as award)	i.e. if it mentions specific countries or company subsidiaries to be excluded, if applied as PQ only	Less strictly than SPE's position	Not applied or I do not know



02

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Net-Zero Industry Act

Solar PV has become the backbone of Europe's clean energy transition. Installations have reached record levels in recent years, making solar PV one of the most cost-effective sources of electricity across the continent. By 2025, the EU had reached a cumulative 409 GW of installed solar capacity, surpassing its mid-decade milestone, with solar accounting for over 13% of total EU electricity generation and becoming the largest power source during several peak months¹.

At the same time, Europe's success in deploying solar comes with a structural dependency: the EU remains overwhelmingly dependent on third-country manufacturing for most key PV components. Recent geopolitical tensions, supply chain disruptions, and growing global competition for clean-tech manufacturing have brought economic resilience back to the centre of the EU policy debate.

In response, the European Union adopted the Net-Zero Industry Act in June 2024 as a cornerstone of its Clean Industrial Deal to rebuild industrial capacity in strategic net zero-technologies.² For solar, it sets a target of 30 GW of operational manufacturing capacity by 2030 across the full value chain and establishes an objective that 40% of the EU's annual deployment needs for net-zero technologies be supplied by European manufacturing by the end of the decade.

To achieve this, the NZIA introduces a new demand-side toolbox that goes beyond price-only competition. It requires Member States to integrate binding non-price criteria, such as resilience and sustainability, into certain parts of public procurement, renewable energy auctions, and public support schemes.³ Under the Net-Zero Industry Act, 'resilience' is the only explicit, operational mechanism that links these demand-side measures to diversification and the 30 GW reshoring objective.

By moving beyond price-only competition, the NZIA seeks to reward projects and suppliers that contribute to more diversified, sustainable and secure supply chains. These provisions are already influencing project design, corporate strategies, and investment decisions of the industry. Since the adoption of the NZIA, the European Commission has issued guidance, implementing regulation and delegated acts on key market-facing provisions in 2025 and 2026, including sustainability and resilience criteria in public procurement, in renewable energy auctions and support schemes for net-zero technologies.^{4 5 6}

Although the NZIA already entered into force in June 2024, its core demand-side obligations (public procurement, auctions and public support schemes) become operational after the 18-month deferral, meaning Member States are effectively required to apply the rules from 1 January 2026, with some procurement elements phased in fully by mid-2026 timeframe.⁷ Several Member States have already begun translating these provisions into practice through pilot auction designs, pre-NZIA resilience criteria and targeted support schemes, while others are still at an early preparatory stage (see chapter 4).

1 SolarPower Europe (2026): [SolarPower Europe Global Solar Market Outlook 2026-2030](#)

2 European Union (2024): [Regulation \(EU\) 2024/1735 – Net-Zero Industry Act](#)

3 European Union (2024): [Regulation \(EU\) 2024/1735 – Net-Zero Industry Act](#) – Articles 25, 26, 28

4 European Union (2025): [Commission Delegated Regulation \(EU\) 2025/1176 specifying the pre-qualification and award criteria for auctions for the deployment of energy from renewable sources](#)

5 European Union (2026): [Implementing regulation – EU – 2026/718 – EN – EUR-Lex](#)

6 European Commission (2026): [Communication \(EU\) 2026/123 – Guidance on Public Support Schemes for Net-Zero Technologies under the Net-Zero Industry Act](#)

7 European Union (2024): [Regulation \(EU\) 2024/1735 – Net-Zero Industry Act](#) – Entry into force provisions (Art.49).

Article 25:

Sustainability and resilience contribution in public procurement procedures

Article 25 NZIA introduces mandatory environmental sustainability requirements and resilience-related non-price criteria in public procurement procedures for net-zero technologies, including solar PV. Public buyers must integrate environmental sustainability criteria (Article 25(1)), as well as additional non-price criteria such as responsible business conduct, cybersecurity compliance, and the ability to deliver projects on time (Article 25(3)). These additional non-price obligations operate as mandatory pre-qualification requirements. Bidders must demonstrate responsible business conduct, compliance with cybersecurity standards, and sufficient capacity to deliver the project on time to be admitted to the evaluation stage. In contrast, environmental sustainability criteria are obligatory but do not have to be applied as pre-qualification criteria by default. They may instead be incorporated as award criteria or technical specifications depending on the procurement design.

Contracting authorities must also apply the resilience non-price criterion – triggered if there is dependency on a dominant non-EU third country – aimed at reducing excessive dependency on a single source of supply, including through diversified sourcing and verification of component origin (Article 25(7)). The resilience non-price criterion may, however, be waived where their application would lead to disproportionate impacts such as a significant reduction in competition, insufficient supply, a clear risk to project delivery or if the project would face disproportionate costs at more than 20%.

The Implementing Act of Article 25 NZIA establishes minimum mandatory environmental sustainability requirements only for wind technologies and does not introduce any new obligations for solar PV. For solar PV, the NZIA simply refers to existing EU legislation, namely PV Ecodesign and the Energy Labelling Regulation as the applicable minimum environmental sustainability framework, without further specifications.^{8 9} As a result, there is no obligation under the NZIA or its Implementing Act to define or apply additional minimum sustainability requirements for solar PV in public procurement. Contracting authorities may nonetheless choose to apply sustainability considerations on a voluntary basis, either through additional minimum requirements or environmental award criteria, as explicitly allowed under Article 25(2) NZIA. In practice, any such criteria would therefore be set at the discretion of individual contracting authorities and developed independently of the NZIA Implementing Act. The Commission published a guidance document for the implementation of Article 25 NZIA in July 2026, detailing their recommendations for the implementation of the non-price criteria included in the act.¹⁰

8 European Commission (2025): [Presentation Ecodesign & Energy labelling requirements for PV_O.pdf](#)

9 European Commission (2025): [Regulation - 2017/1369 - EN - EUR-Lex](#)

10 European Commission (2026): [Guidance on Article 25](#)

Market for public procurement under the Net-Zero Industry Act

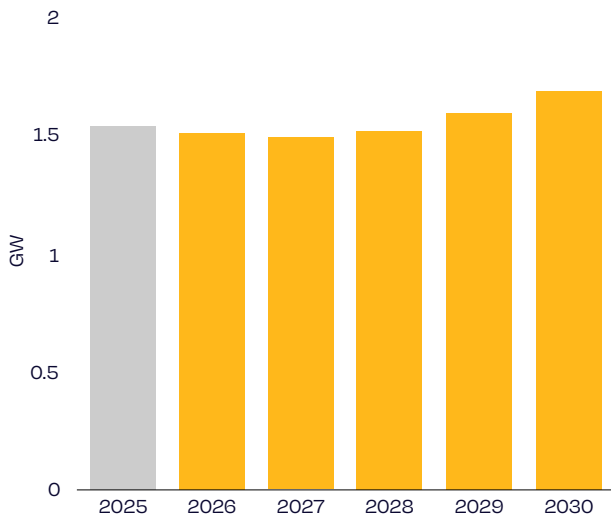
The public procurement market is expected to be mostly impacting the solar PV rooftop segment, particularly across public buildings such as schools, administrative facilities, and hospitals. The European Commission estimates that approximately 3% of the overall PV market could fall within the scope of public procurement.¹¹ Based on this benchmark and taking into account the expected evolution of the annual EU solar market, we assume that around 5% of the EU rooftop PV market will be subject to public procurement requirements. Applying this assumption to the EU rooftop PV market forecast under SolarPower Europe’s Medium Scenario through 2030, we estimate the market potentially covered by Article 25, as illustrated in Figure 2.

Over the 2026–2030 period, the addressable market is estimated at approximately 8 GW, with annual installation volumes stable at about 1.5 GW. Germany, Italy, and France are expected to account for nearly half of this volume, reflecting the absolute size of their rooftop PV markets.

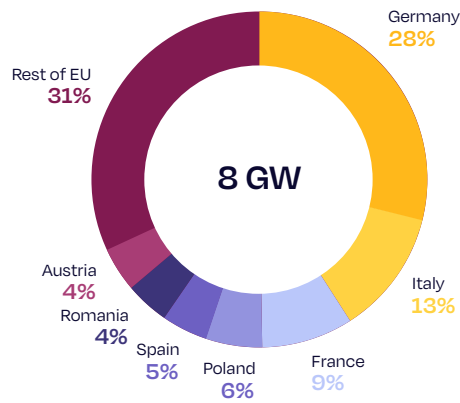
Figure 2

NZIA public procurement rules could unlock nearly 8 GW of EU demand for resilient solar

Annual forecast of EU solar PV capacity falling into Art. 25



Countries market share of cumulative capacity falling into Art 25. (2026-2030)



© SolarPower Europe

11 SolarPower Europe (2025): [Reshoring Solar Manufacturing to Europe](#) - SolarPower Europe.

Article 26:

Renewable energy auctions

Article 26 Net-Zero Industry Act introduces mandatory non-price criteria in renewable energy auctions. From 2026, Member States must apply these criteria to at least 30% of the annual auctioned volume, or a minimum of 6 GW per year, with non-price criteria accounting for 15–30% of the evaluation score. Non-price criteria can be applied either as pre-qualification (PQ) as a mandatory minimum requirement to determine eligibility for the bid or as award criterion to evaluate and rank bids beyond price. The criteria of Art. 26 NZIA cover, in particular, responsible business conduct (PQ), cybersecurity (PQ), the ability to deliver projects on time (PQ), and contributions to sustainability and supply-chain resilience (PQ or award).

The resilience criterion requires that four key components – including modules, cells, inverters, and one additional component – do not come from the dominant source of supply (the '3 + 1' rule).¹² Member States retain flexibility to apply certain criteria as pre-qualification or award criteria and may waive them where their application would lead to a cost increase exceeding 15%.

The European Commission will assess the application of non-price criteria in renewable energy auctions by 30 December 2027.¹³ For the solar sector, these provisions affect all actors participating in national PV auctions. Public undertakings competing in auctions are assessed exclusively under Article 26 rules, ensuring equal treatment with private bidders.

To support implementation, the Commission adopted an act listing net-zero technology final products and their main specific components, which helps identify when the mandatory application of the resilience non-price criterion is triggered.¹⁴ This framework is complemented by a Commission Communication mapping the origins of the EU's net-zero technology supply and highlighting third-country dependencies.¹⁵ Beyond the NZIA secondary legislation, the Commission published a guidance document in July 2026 detailing their recommendations for the implementation of Article 26.¹⁶

12 European Commission (2025): [Implementing regulation - EU - 2025/1176 - EN - EUR-Lex](#).

13 European Commission (2024): [Regulation \(EU\) 2024/1735 - Net-Zero Industry Act](#) - Auctions to deploy renewable energy sources (Art.26).

14 European Commission (2025): Delegated Regulation amending Regulation (EU) 2024/1735 of the European Parliament and of the Council as regards the [identification of sub-categories within net-zero technologies and the list of specific components used for those technologies](#).

15 European Commission (2025): Communication from the Commission providing updated information to determine the shares of the European Union [supply of final products and their main specific components](#) originating in different third countries under Regulation (EU) 2024/1735 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem (Net-Zero Industry Act).

16 European Commission (2026): [Guidance on Article 26 of Regulation \(EU\) 2024/1735 on establishing a framework of measures for strengthening Europe's net-zero zero technology manufacturing ecosystem and amending Regulation \(EU\) 2018/1724](#)

Market for PV auctions under the Net-Zero Industry Act

Renewable energy auctions under Article 26 apply primarily to utility-scale projects, but also to the rooftop segment in a few selected markets.

It is important to note that small projects (up to 10 MW under Article 26) may be exempt from volume calculations or treated separately. Article 26 stipulates that 30% of auction volumes, or alternatively 6 GW, must apply NZIA criteria (sustainability, resilience, etc.) when evaluating bids.

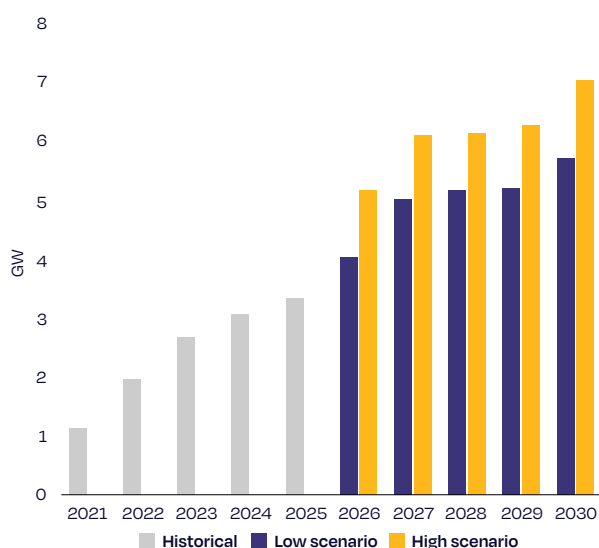
No forecasts of auction-awarded capacities are published by Member States. Based on the historical European auction market¹⁷ and current and anticipated industry trends, we estimate that the annual capacity allocated through auctions across the EU will increase gradually through 2030.

Assuming that the 30% criterion applies at the European level, and based on standard industry assumptions, we estimate the annual installed PV capacities resulting from NZIA-compliant auctions will range between 4–5 GW in 2026 and about 6–8 GW by 2030 (Figure 3). This is equivalent to up to 31 GW of auction-driven solar capacity falling under the scope of NZIA for the period 2026–2030.

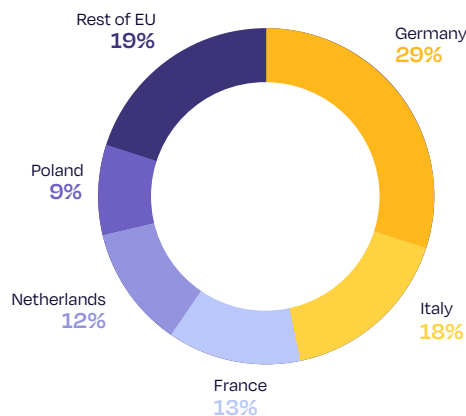
Figure 3

In theory, NZIA auctions could stimulate EU demand for up to 31 GW of resilient solar between 2026 and 2030

Annual EU solar PV capacity installed falling into Art. 26



Cumulative EU solar PV capacity awarded through auctions by country (2021–2025)



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17 SolarPower Europe (2025): [Auctions and Corporate PPAs – European Market Review 2025](#).

Article 28:

Other forms of public interventions

Article 28 of the NZIA applies to public support schemes that incentivise the purchase of net-zero technology final products and introduces non-price criteria aimed at strengthening resilience and promoting more diversified supply chains. Under these schemes, Member States must integrate the resilience non-price criterion, including product origin and component-level sourcing, when defining eligibility and award conditions. Commission guidance confirms that Article 28 covers support schemes targeting consumers, households and businesses, while excluding operational-expenditure support mechanisms such as feed-in tariffs or Contracts for Difference (CfDs). These schemes are expected to reflect sustainability and resilience objectives, while remaining distinct from the procurement-based and auction-based frameworks established under Articles 25 and 26 respectively. The guidance emphasises flexibility for Member States in scheme design, provided that measures are transparent, non-discriminatory, and consistent with State aid rules, and underlines the need to avoid overlap with procurement and auction frameworks under Articles 25 and 26.

Market for other rooftop PV under the Net-Zero Industry Act

The rooftop PV segment is primarily addressed under Article 28 of the NZIA as an 'other form of public intervention'. This is understood to be including different forms of consumer support frameworks, such as upfront investment support, tax credits, deductions and reductions, and so on¹⁸. More broadly, it includes schemes that are not public procurement (Art. 25) and not renewable energy auctions (Art. 26), but where public authorities provide financial incentives for the purchase of net-zero technologies.

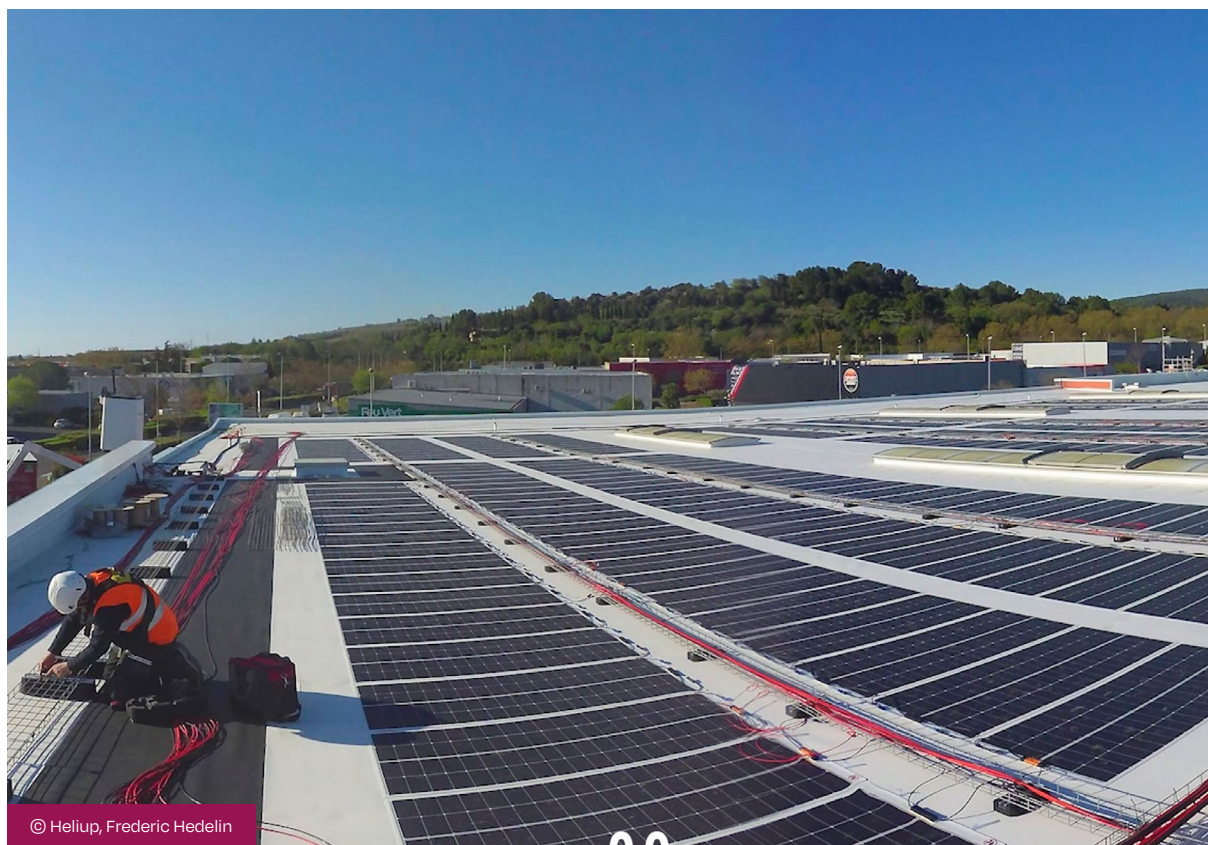
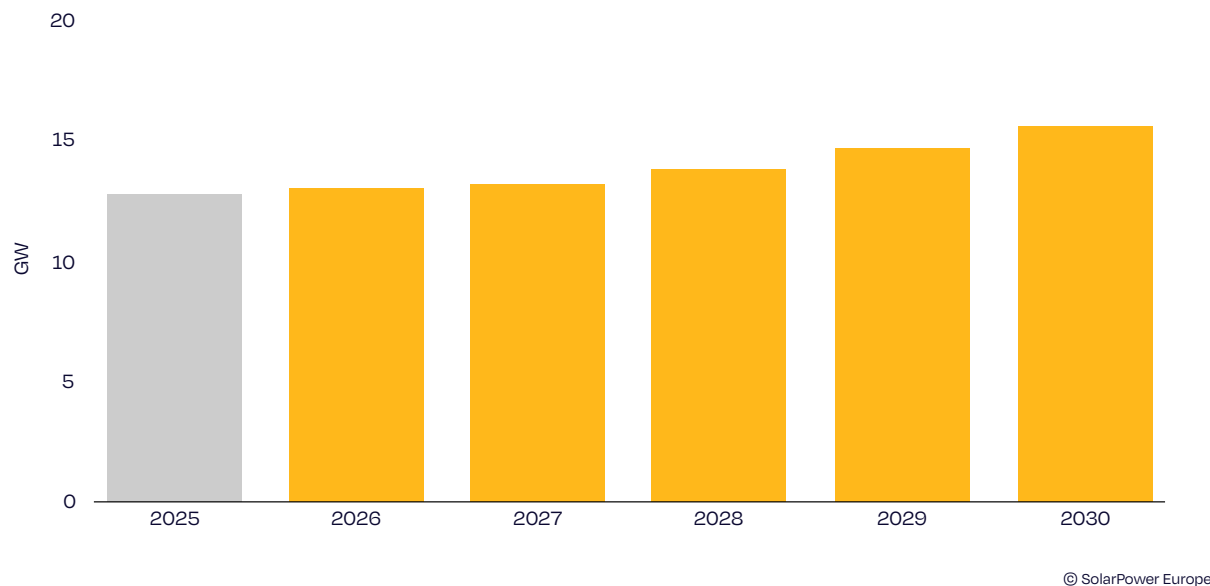
Based on a bottom-up country-specific analysis of the currently available support frameworks and expected policy changes, we anticipate the volume of installed PV capacity falling under the scope of Article 28 (Figure 4). Over the 2026-2030 period, the addressable market under Article 28 is estimated at approximately 70 GW, with annual installation volumes in the range of 13-16 GW throughout the period. This is equivalent to roughly 45% of the total rooftop PV capacity expected to be installed until 2030.

¹⁸ The [EU Commission guidance document](#) on Article 28 NZIA refers to schemes that target the purchase of net-zero technology final products – not their installation, use or operation. It is explicitly mentioned that schemes that incentivise the production of renewable energy, like feed-in tariffs, are not covered by Article 28.

Figure 4

Support schemes under the scope of Art. 28 NZIA could unlock over 70 GW of EU demand for resilient rooftop solar until 2030

Annual forecast of EU solar PV capacity installed falling into Art. 28



03



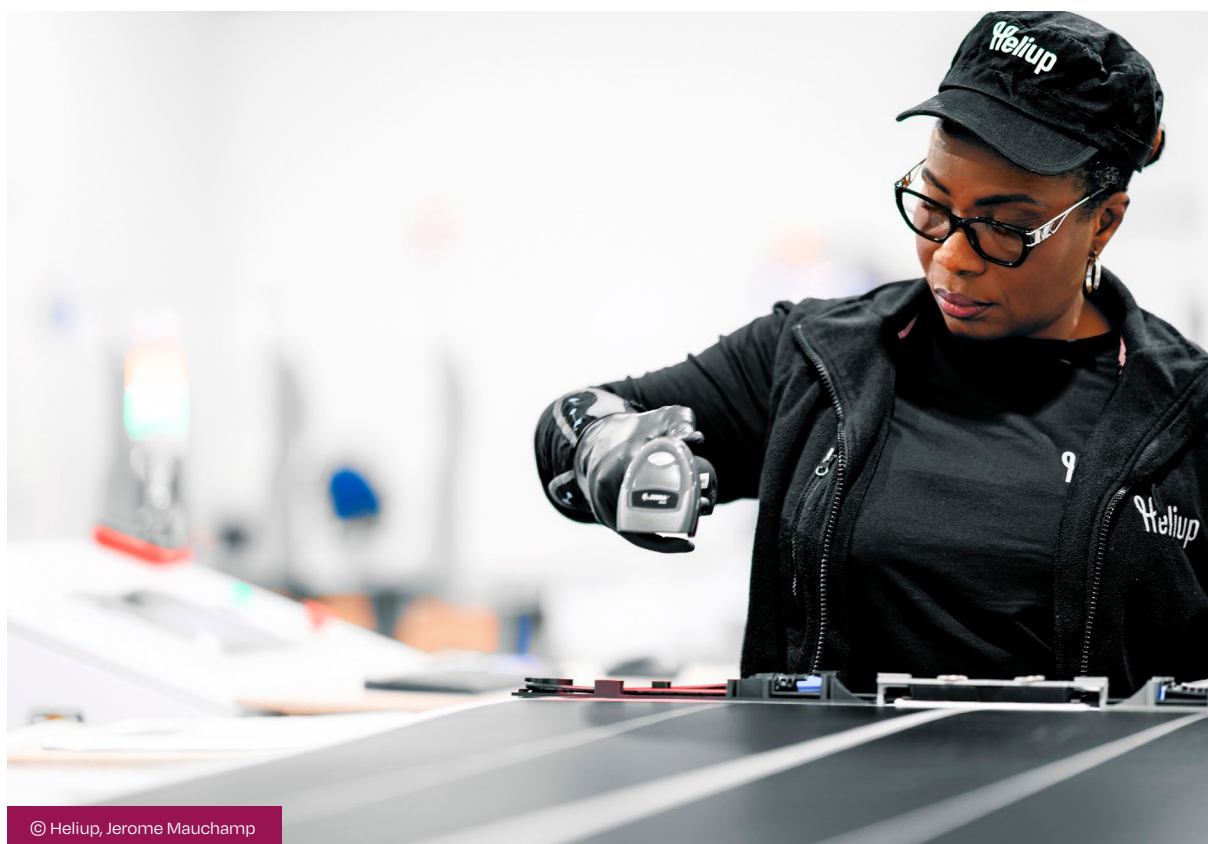
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Industrial Accelerator Act

The Commission's Industrial Accelerator Act (IAA) proposal would establish 'Made in EU'¹⁹ criteria as a demand-side tool applicable to public procurement, auctions and support schemes under amendments to the NZIA, applicable to a limited number of strategic sectors such as energy intensive industries and clean technologies. The objective of this definition is to safeguard EU manufacturing capacity. The text is currently undergoing the co-legislative process and the description provided in this section is based on the Commission's proposal. The Commission's proposal would introduce Union-origin requirements for selected key components that are to be applied progressively after entry into force. They are framed as European preference rather than quotas and come with safeguards on disproportionate costs and WTO/state-aid compliance.

For solar PV, 'Made in EU' requirements would be phased in over time. Notably, no Phase I requirements would be introduced for solar PV, which would be applicable one year after entry into force of the IAA. In Phase II – starting three years after entry into force – public procurement procedures, auctions and public support schemes would require the PV inverter and the cell (or equivalent) to originate in the EU.

Article 28d clarifies the default scope of Union-origin requirements under the Industrial Accelerator Act proposal by defining Union origin as content originating in the European Union. However, three subsequent articles (28e, 28f, 28g) provide criteria for the equivalence of third-country content, varied by instrument; for public procurement (Art. 25(a) NZIA), Union origin includes content originating in third countries that have a free trade agreement (FTA) or a customs union with the EU, or that are parties to the GPA. For auctions (Art. 26(a) NZIA) and public support schemes (Art. 28(a) NZIA), Union-origin equivalence only includes countries with an FTA or customs union with the EU.



19 'Made in EU' refers to products qualifying as Union-origin, which is the term used by the European Commission in its Industrial Accelerator Act proposal.

As per proposal, the Commission would be empowered to adopt delegated acts specifying, for products and services covered by Annex II, which specific third countries may be treated as equivalent to Union origin. In making this determination, the Commission would be required to take into account reciprocal international commitments, notably under the WTO Government Procurement Agreement, as well as the contribution of those countries to the Union's competitiveness, resilience, and economic security objectives. This mechanism would introduce a degree of flexibility in the application of 'Made in EU' rules.

'Made in EU' is explicitly positioned as complementary to the Net-Zero Industry Act. It puts an additional layer on top of the resilience criterion under the NZIA. It follows a component-based approach as seen in the NZIA. Based on the current legislative timetable, the ITRE, IMCO and INTA committees published their draft report on 8 September. The Committee is expected to vote on 1 December and the plenary vote in December 2026 as well. Trilogue negotiations are therefore unlikely to begin before December, with final adoption and entry into force of the IAA most likely in Q1 2027.



04

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Selected Member States

Austria

While not strictly falling under NZIA implementation, Austria implemented a 'Made in Europe' bonus in 2025 as part of its Renewable Energy Expansion Act (EAG), aimed to strengthen the domestic PV supply chain.²⁰

Effective from 23 June 2025, a bonus of up to 20% was applied to government funding for PV and battery storage projects utilising components manufactured within Europe. The financial incentive is available for key PV components (modules, inverters and battery storage systems), that are listed on an official whitelist and verified by accredited institutions. To qualify for the bonus rate, these components must meet strict manufacturing criteria defined by the Austrian Ministry of Economic Affairs, Energy and Tourism. For PV modules and inverters, all key production steps (such as assembly, wiring, testing, and packaging) must be completed within the EU, EEA or Switzerland, while for battery storage systems, at least one critical step (like battery cell production or integration) must occur in these regions. Manufacturers are required to provide inspection certificates, and detailed guidelines are available to ensure compliance with the 'manufactured in Europe' definition. Proof of European added value from a relevant conformity assessment body must be submitted via email to the EAG funding administration office. Whether a project submitted for funding meets the requirements for the 'Made in Europe' bonus is verified during the final settlement stage of the funding application procedure.

Austria ultimately paid out around 190 million EUR instead of the 60 million EUR originally allocated for 2025 to solar PV and storage projects. The results show a willingness to pay for 'Made in Europe' products and a strong market uptake following the introduction of the 'Made in Europe' bonus, which was extended in 2026. Across the three 2025 calls, Austria received 34,618 valid PV applications, of which over 83% included battery storage systems, confirming the scheme's strong pull effect for PV-plus-BESS installations. The share of projects requesting the 'Made in Europe' bonus increased steadily. In the second and third calls alone, more than 21,000 applications submitted at least one European-made component (modules, inverters, or storage), with applications most frequently declaring European inverters. Nonetheless, the bonus just covers a small part of the additional costs. That means consumers still pay more than for systems without European-made components, but seem willing to pay that.

The Austrian scheme does not restrict market access but instead provides additional financial support for projects that use European-manufactured components. The Austrian federal government is planning to modify the funding criteria for 2027.

20 EAG Abwicklungsstelle (2025): [Made In Europe Bonus](#)

France

Strategic Framework: The Pacte solaire

The *Pacte Solaire* is a French national initiative launched in April 2024 by the French government, bringing together the State, solar manufacturers, developers, and large electricity buyers.²¹ It sets out the overarching framework for France's solar reindustrialisation strategy, combining the objective of accelerating solar deployment with the rebuilding of a domestic solar PV manufacturing base. In practice, the *Pacte solaire* seeks to increase the uptake of solar panels manufactured in France and to provide both demand security and long-term visibility for planned gigafactories across the PV value chain. It is closely aligned with the NZIA, as it anticipates at a national level the NZIA's demand-side logic by promoting resilience and low-carbon criteria in support schemes and procurement. French authorities have explicitly presented the *Pacte solaire* as a precursor to the implementation of NZIA, aiming to prepare the market and industrial actors ahead of the EU-wide application of NZIA provisions.

Multiannual Energy Plan

This strategic orientation is reinforced by the *Programmation Pluriannuelle de l'Énergie* (or Multiannual Energy Plan PPE3) adopted in February 2026, which explicitly links solar deployment targets to domestic manufacturing growth.²² Under the PPE3, France sets a revised solar capacity target of 48 GW by 2030 and 55–80 GW by 2035, with annual auction volumes of around 2.9 GW per year from 2026 onwards. According to the government, these deployment levels are intended to enable the emergence of new gigafactories for PV modules and cells, representing approximately EUR 1 billion in investment, the creation of around 2,000 direct manufacturing jobs, and more than 38,000 jobs across the solar PV industry by 2030. However, only one ground-mounted PV auction has been confirmed for 2026 – the July round. Many solar projects have already secured support and are progressing, with about 5.7 GW expected to be completed in 2026 and a further 4.3 GW in 2027. As a result, auction volumes may fall below the original 2.9 GW/year envisioned in PPE3.

The French government has also confirmed a 500 MW technology-neutral auction for autumn 2026. In the past, a high proportion of the capacity in these auctions have typically been won by solar – especially Agri PV – due to its cost competitiveness. In the most recent round (January 2026), PV projects secured approximately 465 out of the 500 MW awarded. Looking to the future, the responsible minister has announced that the government is currently preparing additional ground-mounted PV auctions, with a possible launch in January 2027.²³

Appel d'offres simplifié (AOS) - Simplified auctions for medium-sized solar PV projects

France supports resilient solar PV deployment through a range of auction schemes operating under its broader PPE3. The *Appel d'offres simplifié* targets 1.4 GW of commercial and industrial rooftop PV projects in the 100–500 kW segment. Its first application period ran from 22 September to 2 October 2025, with a capacity cap of 192 MW and a price ceiling of EUR 95/MWh, thereby

21 French Government, Ministry of the Economy, Finance and Industrial and Energy Sovereignty (2024): [Pacte solaire](#)

22 French Government, Ministry of the Economy, Finance and Industrial and Energy Sovereignty (2026): [Multiannual Energy Plan – PPE 3 \(2026–2035\)](#).

23 French Government, Ministry of the Economy, Finance and Industrial and Energy Sovereignty (2026): [Presentation of calls for auctions for onshore and offshore wind power and photovoltaics in the PPE3](#)

operationalising a form of demand segmentation at national level aligned with NZIA objectives.²⁴ While diversification and resilience objectives are mentioned, the September 2025 AOS, was not required to take these criteria into account. The scheme is not reserved exclusively for EU manufacturers. Due to the trade-off between the programmes' administrative requirements and the competitiveness rule, 59% of the projects were not selected. Ultimately, 44% of the target amount was allocated.

Building on this experience, France revised the scheme in 2026 through the launch of the 'Petit PV' auction under the PPE2 framework. This revision maintained support for 100-500 kW solar rooftop PV installations, and was extended to include ground-mounted PV projects. The evolution of the framework also provided the opportunity to integrate the resilience non-price criterion (the '3+1 rule') introduced by the NZIA implementing acts.

For periods launched on or after January 1, 2026, the specifications for this call for auctions were updated to include a resilience criterion, in accordance with Art. 26 NZIA Implementing Regulation. Thus, to be eligible for these future periods, bids must be based on PV panels that comply with 4 out of 8 components, requiring a resilient modules, solar cells and inverters, combined with at least one additional resilient component selected from polysilicon, ingots, wafers, glass or trackers. To bring this call for bids into compliance with the NZIA, additional pre-qualification criteria will also be introduced, relating in particular to corporate responsibility, cybersecurity, and data security.



Appel d'Offres PPE2 PV Sol, period 9 - Ground-mounted PV auctions

France has also published the specifications (cahier des charges) for the ground-mounted PV auction for systems with a power rating of more than 500 kWp (*AO PPE2 PV Sol, period 9*), marking the first national implementation of NZIA resilience non-price criterion. Admissibility requires compliance with a resilience condition: systems must not be assembled in a dominant non-EU third country, and at least four out of eight key PV components must not originate from that country. Modules, cells and inverters must be included among these four components. The second

²⁴ CRE (2025) : [Appel d'offres simplifié 100-500 kWc \(cahier des charges\)](#), 7 August 2025.

period of the AOS, scheduled from July 20–31, will also incorporate the resilience criteria. This will take place at the same time as the next session of the ground-mounted auction, which is from July 20–30.

The framework introduces enhanced supply-chain disclosure and verification requirements. In particular, compliance relies on detailed documentation of manufacturing origin and production sites for PV modules and key upstream components (cells and wafers), including identification embedded in module labelling or serial numbers, certification by ISO-accredited bodies, and recent third-party audits of production sites, with verification at the attestation of conformity stage. No explicit 'Made in Europe' requirement is included; instead, the approach focuses on excluding reliance on the dominant third country without mandating EU manufacturing. The resilience criterion is complemented by a simplified carbon footprint criterion as part of the non-price criteria. The auction (925 MW) is scheduled for submission in July 2026. It is envisioned that cybersecurity and the full set of NZIA criteria will be applied in line with the regulation in the autumn auctions. A date has not yet been set for these, but a consultation on the criteria has been opened by the government, indicating their involvement. The French government has also announced that 'Made in EU' criteria would be applied in 2027 auctions, anticipating the entry into force of the IAA.

Reduced VAT scheme for residential PV

Alongside the auction schemes, France has introduced demand-side incentives reflecting the environmental and industrial objectives of the *Pacte solaire*. From 1 October 2025, residential solar PV systems below 9 kW benefit from a reduced VAT rate of 5.5% instead of the standard 20%. To qualify, systems must comply with sustainability requirements. These include a maximum module carbon footprint threshold of 530 kgCO₂/kW, calculated according to the French carbon assessment method, as well as requirements on the origin and traceability of strategic materials and manufacturing processes.

This measure is intended to steer private demand towards lower-carbon and more sustainable PV products, in line with the broader *Pacte solaire*. The impact of the measure has so far remained limited, as the certification criteria have not led – as initially expected by some – to an advantage for European manufactures compared to their international competitors. Several manufacturers outside of Europe are capable of meeting the set requirements and currently hold a dominant share of the market. This goes to show that, carbon footprint criteria are and should remain an environmental tool, not an industrial policy tool. Efforts to misuse carbon footprint criteria to create benefits for European manufacturers risk harming the sector more broadly, while failing to lead to beneficial environmental outcomes. To strengthen European manufacturing, Member States should rely on dedicated resilience and 'Made in EU' criteria, supported by targeted supply-side measures. Any carbon footprint requirements should be based on a robust and harmonised EU methodology that recognises the role of private sector investments into renewable energy. It should ensure consistency across the Single Market and safeguard private sector investments into sourcing renewable energy for their production.

Ireland

Ireland has incorporated Article 26 NZIA into the sixth Renewable Electricity Support Scheme auction RESS 6.²⁵ The RESS 6 Terms and Conditions state that the auction framework incorporates relevant aspects of Article 26 and the associated implementing regulations, with the objective of aligning Irish renewable energy auctions with the NZIA while supporting more robust and diversified supply chains.

Ireland has chosen a relatively cautious and proportionate implementation. Rather than introducing resilience as strict pre-qualification condition, the Department of Climate, Energy and the Environment selected an auction design in which 5% of available non-price criteria points are allocated to resilience and 10% to energy system integration. This approach – applied to 100% of its auctions – seeks to comply with Article 26 in ways that minimise administrative complexity while also limiting the risk of reduced competition, lower auction participation, cost increases or delayed deployment.

This makes RESS 6 a softer implementation model than some more restrictive approaches observed in other Member States. Eligibility remains focused on solar PV, onshore wind and hybrid configurations, and the minimum eligible project size was increased to 1 MW.



25 Irish Department of Climate, Energy and the Environment (2026): [Renewable Electricity Support Scheme 6 \(RESS 6\)](#).

Italy

FER X transitorio auction (2025)

At the end of 2025, Italy anticipated the implementation of the NZIA through its FER X auction scheme, which introduced an early 'resilience based' auction design for solar PV projects aimed at strengthening supply chain security.²⁶ In August of 2025, Italy's renewable electricity support scheme for renewable technologies FER X, was amended to add the article on resilience. Italy reserved up to 20% of the PV auction volume for a dedicated resilience auction segment subject to origin requirements. The initial FER X transitorio auctions applied the resilience criterion as a pre-qualification criterion, requiring that PV modules shall not be assembled in China, that PV cells and inverters shall not be of Chinese origin, and that at least one additional key component be sourced from outside China. These requirements extended not only to products manufactured in China, but also to products manufactured elsewhere by companies headquartered in China or belonging to corporate groups with a Chinese parent company.²⁷ Compliance had to be demonstrated through official documentation, including Dichiarazioni Sostitutive di Atto Notorio (DSAN) – formal sworn declarations issued by manufacturers under Italian law to certify compliance with eligibility and origin requirements – and Factory Inspection Certificates, submitted at different project stages.

The registration period for the first FER X resilience auction closed on 31 October 2025 and resulted in a slight oversubscription of the 1.6 GW volume allocated for this round, despite significantly lower participation compared to initial expressions of interest which had amounted to approximately 3 GW.²⁸ In practice, the FER X design went beyond the NZIA framework by explicitly excluding Chinese companies and their subsidiaries, irrespective of the geographical location of manufacturing. While the resilience basket formally mirrored the NZIA solar PV criteria set out in the implementing act (the '3 + 1' rule on components not originating from the dominant source of supply), it also introduced an additional company-based criterion. This company-level restriction goes beyond the criteria set out in the NZIA Implementing Regulation.

The stricter approach demonstrated that resilience criteria can influence both bidding strategies and project configuration choices. Developers adjusted sourcing decisions and supplier selection to improve their performance against resilience non-price criterion, illustrating how supply chain diversification rules can shape market outcomes.

The resilience auction reached its volume target, awarding 1.1 GW of solar PV capacity at an average strike price of 66.4 EUR/MWh. This compares with 7.7 GW awarded under the parallel technology-neutral auction at an average price of 56.8 EUR/MWh. The resulting price premium of approximately 10 EUR/MWh (~17%) illustrates that supply-chain diversification can be achieved through auctions, but at a measurable cost. This premium slightly exceeds the 15% uplift envisaged under the NZIA to reflect the value of resilience and sustainability. While resilience non-price criterion therefore demonstrably increases costs, it is noteworthy that FER X transitorio stroke prices remain below Italy's wholesale electricity reference price, still delivering net savings for the electricity system. While it is unclear whether the winning projects will ultimately use European or non-European modules, the FER X transitorio results show that resilience considerations do not appear to have prevented highly competitive auction outcomes.²⁹

26 Ministero dell'Ambiente e della Sicurezza energetica italiano (2025): [Rinnovabili: entra in vigore il decreto FER X transitorio](#)

27 Ministero dell'Ambiente e della Sicurezza energetica italiano (2025): [Decreto DM 4 agosto 2025](#)

28 PV Magazine (2026): [Italy launches 1.6 GW solar auction – PV magazine International](#)

29 Finergreen (2025): [FER X Auction Results](#)

The FER X transitorio auction relied exclusively on resilience criteria and treated them as a gatekeeping condition. Non-compliant bidders were excluded entirely and no additional non-price criteria such as sustainability were included. Italy's FER-X auction offered a first real-world test of 'resilience-only' rules, going further than the NZIA by requiring three fixed components (modules, cells and inverters) to be sourced from non-Chinese suppliers, with a fourth component also to be sourced from non-Chinese suppliers. This stricter design illustrated how resilience non-price criterion can materially affect winning bids and project configurations, providing an early indication of how supply chain diversification rules shape bidding behaviour and outcomes. It must be noted that while Italy adopted a proactive approach by anticipating the NZIA provisions, the use of resilience criteria— while effective in stimulating supply chain diversification as intended – may not have the effect of reshoring solar manufacturing to Europe.



FER X definitivo auction (2026)

In June 2026, an Italian state aid package amounting to EUR 23 billion was approved by the Commission under the Clean Industrial Deal State Aid Framework.³⁰ This package aims to support the deployment of new renewable electricity capacity, covering solar PV, onshore wind, hydropower and biogas, with an overall target of 37.15 GW of new capacity. Under this support scheme, FER X definitivo³¹ is a revised support scheme for 2026-2030, succeeding previous schemes such as the previously discussed 2025 round of FER X transitorio. Resilience criteria are included in the auction design for at least 30% of auctioned capacity. Similar to FER X transitorio, the FER X definitivo goes beyond the NZIA resilience rules by requiring that eligible PV projects use modules, cells and inverters that are either not manufactured in facilities located in the relevant third countries, or not managed by companies headquartered in those countries, or not part of corporate groups whose parent company is headquartered there.

30 European Commission (2026): [Commission approves €23 billion Italian State aid scheme to support renewable electricity production](#)

31 GSE (2026): https://www.gse.it/documenti_site/Documenti%20GSE/Servizi%20per%20te/FERX%20DEFINITIVO/Regole%20operative%20DM%20FERX%20Definitivo%20-%20Parte%20A.pdf.

Companies in >1 MW solar PV auctions must meet criteria for responsible business conduct, cybersecurity and data security robustness, ability to deliver the project on time, and resilience criterion that are specifically targeted at solar PV and wind. While these criteria are required to participate in the auctions (i.e. they are pre-qualification criteria), the winning bids are selected with sustainability criteria. Under the FER X definitivo, the sustainability award criterion is not environmental sustainability, but defined through energy system integration and flexibility criteria. Yet, it is labelled as sustainability. The sustainability weight is 5%, and may become commercially relevant if auction competition is tight, favouring hybrid projects, grid-supporting siting and sector-coupling solutions, depending on how the implementing rules define scoring and evidence requirements. The 37.15 GW of total capacity is split into two broad categories. The first is a direct access tranche, available to renewable energy projects (e.g. solar, onshore wind, hydro, sewage gas) ≤ 1 MW, for which no competitive auction is required. The second is a competitive auction tranche of 27.15 GW, of which 10 GW is allocated directly towards solar PV.

National support schemes

Several Italian investment support schemes apply 'Made in EU' requirements through eligibility conditions rather than award criteria anticipating early Industrial Accelerator Act requirements. These include the *Iperammortamento 2.6* (Law 199/2025, Art. 1(427)(b)), which provides enhanced depreciation for PV investments, and the forthcoming DL Bollette, expected to support revamping and repowering of existing Conto Energia plants between 2028 and 2030 (180% depreciation of PV systems investment once modules and cells are made in EU).³² Under these programmes, access is limited to installations using PV modules registered under DL 181 and EU-produced, high-efficiency modules, with explicit EU-production requirements also applying to inverters and storage. As a result, EU origin is verified upfront at the pre-qualification stage and not applied ex post as a 'Made in EU' award criterion. In this context, what stakeholders refer to as 'pre-qualification+' means that compliance with EU-content is mandatory to enter the scheme, rather than rewarded through scoring or selection criteria. In a similar but less stringent support, the *Transizione 5.0* tax credit provides higher tax credits for PV installations that use EU-made modules and cells, similar to the NZIA Art. 28 approach (additional financial compensation).

A similar approach on 'Made in EU' is emerging under other Italian support schemes, reinforcing a de facto 'Made in EU' gatekeeping logic. Under the new *Parco Agrisolare* auction, access to priority application processing and higher eligible cost ceilings is effectively restricted to projects using PV modules registered in the higher categories (B or C) of the ENEA 'Made in EU, high-efficiency' module registry.³³ Support covers up to 80% of eligible costs, with a cap of €1,500/kWp for systems using EU-made modules and cells, compared with €1,000/kWp for systems using modules assembled in the EU without EU-made cells. A few EU manufacturers qualify under these categories. Comparable design choices have already been observed under the previously mentioned *Transizione 5.0*, *Iperammortamento* and *DL Bollette*.

Future Schemes

A future *FER Z* scheme is briefly discussed as a separate, future support scheme in the recent RES state aid approval from the Commission. It is intended to compliment FER X and other already existing measures by rewarding beneficiaries through a two-way CfD, similar in principle to FER X but employing a different reference volume. The Italian Government has stated that FER Z will include a minimum of 15 GW reserved for PV installations. Overall, Italy appears to be adapting its approach to NZIA implementation depending on the type of support instrument concerned.

32 Gazzetta Ufficiale della Repubblica Italiana (2025): [Decreto n. 25G00212](#)

33 Ministero dell'Ambiente e della Sicurezza energetica italiano (2025): [Masaf - Investimento 4 - Facility Parco Agrisolare](#)

Lithuania

The Ministry of Energy of the Republic of Lithuania initiated the inclusion of NZIA resilience non-price criterion for Art. 28 NZIA in National support schemes.³⁴ Lithuania has introduced a targeted residential solar PV support scheme that incorporates differentiated subsidy levels linked to both technology performance and supply-chain origin, reflecting Art. 28 NZIA. The scheme, administered as a direct investment subsidy for households, has a total budget of EUR 13 million and supports new solar PV rooftop installations on a per-kW basis for prosumers.

Support levels are explicitly tiered. A lower subsidy of EUR 170/kW applies where any main specific PV component defined as PV module, cells and panels originates from China or another dominant supplier (defined as holding more than 50% market share), or where module efficiency is below 23%. A higher subsidy of EUR 220/kW is granted where all main specific components are sourced outside China and module efficiency exceeds 23%. This structure introduces a combined efficiency and origin-based incentive, rewarding higher performance technologies and incentivising diversification away from dominant suppliers without imposing formal eligibility restrictions.

The scheme focuses on core PV components only, including modules, cells and wafers, with no differentiated treatment for inverters, storage systems or balance-of-system elements. It applies exclusively to new residential installations, with support capped at 7 kW per electricity consumption point, and requires beneficiaries to become prosumers. Capacity extensions of existing systems are not eligible under the scheme.

Overall, Lithuania's approach represents a non-binding but financially incentivised diversification. The subsidy design embeds origin-related preferences within a demand-side support scheme. Compared to other Member States, the Lithuanian framework remains relatively narrow in scope, focused on distributed deployment and core components, but provides a clear example of how financial incentives can be used to steer both technology quality and supply-chain choices without restricting market access or deployment of solar PV.

³⁴ [*Aplinkos projektų valdymo agentūra \(2026\): Fizinių asmenų saulės elektrinių įsirengimas namų ūkiuose \(naujai įrengiama saulės elektrinė\) 2026 m. – Aplinkos projektų valdymo agentūra.*](#)

Spain

Spain joins the ranks to transpose the NZIA resilience criterion into National law. While the country has not yet introduced dedicated resilience-based renewable energy auctions, it has begun incorporating resilience non-price criterion into public support schemes, thereby aligning with the implementation of Article 28 NZIA, which governs other forms of public intervention and support mechanisms.

The non-price criteria foreseen under the NZIA are already being applied in selected Spanish grant programmes and are expected to be included in future competitive procedures for grid access and connection rights, as well as in future renewable energy auctions if such auctions are launched. The current approach focuses on reducing strategic dependencies in energy supply chains and strengthening the resilience of clean-tech deployment projects.

Importantly, this resilience criterion does not constitute pre-qualification criteria. Instead, they form part of the overall project evaluation framework alongside other factors such as technical maturity, innovation, economic viability, and project readiness. As a result, resilience considerations influence project rankings through a weighted award mechanism rather than through mandatory eligibility thresholds.³⁵

Spain has also introduced several programmes to strengthen domestic and European clean-tech manufacturing capacities. The *Renewable and Storage Industrial Value Chain Programme* provides investment support for the establishment and expansion of manufacturing facilities across the renewable energy and storage value chain. The first call under this programme was awarded in June 2025 and explicitly seeks to reinforce industrial capabilities within Spain and Europe.³⁶

Similarly, Spain has launched the *Value Chain Reinforcement Programme* under the framework of the EU Clean Industrial Deal state-aid provisions. This scheme continues the focus on strengthening domestic manufacturing by supporting production lines and industrial investments linked to net-zero technologies. The first call was under evaluation during June 2026.³⁷

A further example is the *RENOINN programme* supporting innovative renewable energy projects. While the scheme does not explicitly reference the NZIA, it incorporates criteria relating to positive externalities³⁸, local economic impact, and territorial benefits. These elements are consistent with the broader policy objective of enhancing resilience and generating wider socio-economic benefits from clean energy deployment.³⁹

Overall, Spain's implementation approach has so far relied primarily on award-based resilience criteria. The focus is on supplier diversification, transparency regarding component origin, support for European value chains, and incentives for domestic manufacturing investment.

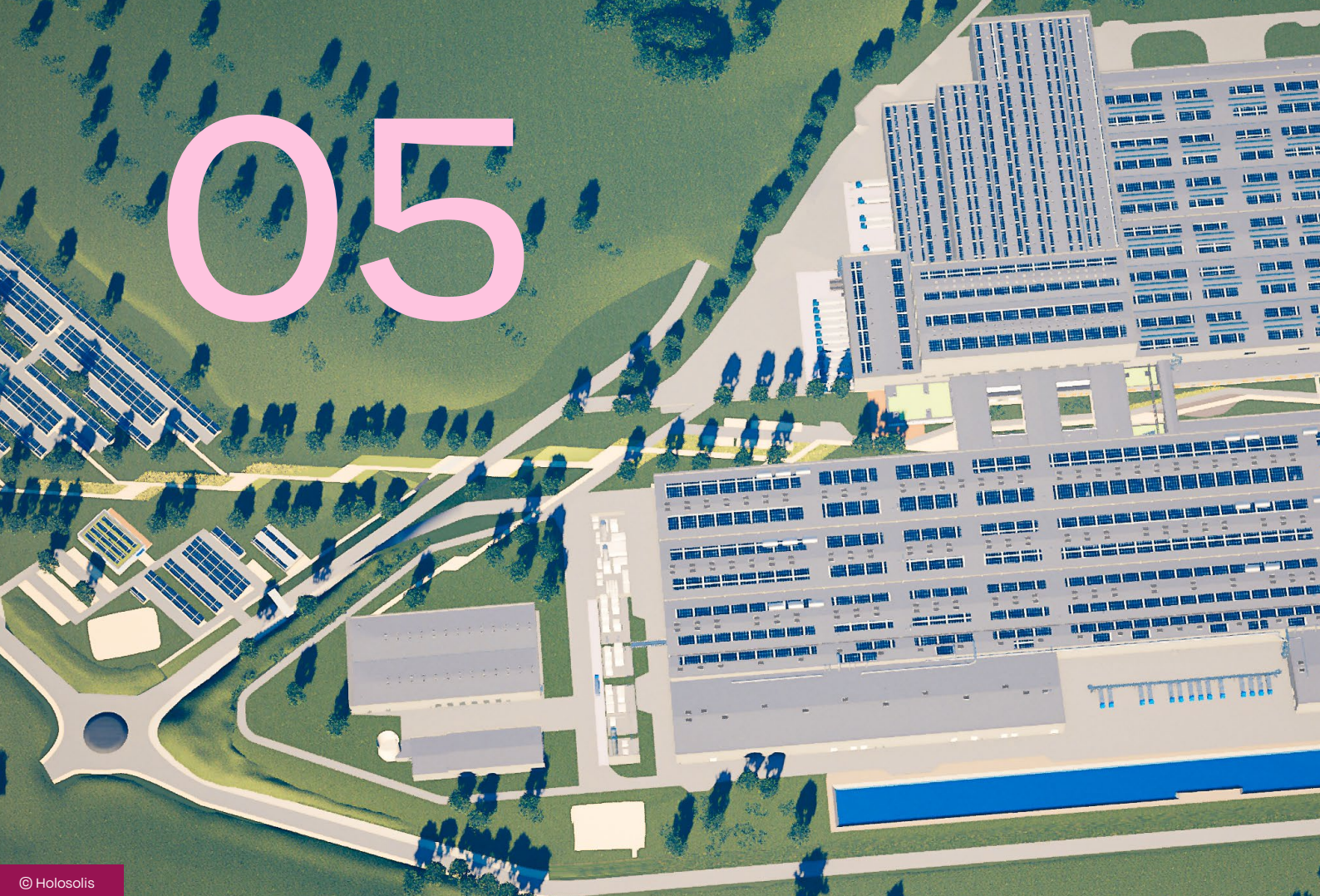
35 Instituto para la Diversificación y Ahorro de la Energía (2024): [Proyectos Innovadores de Almacenamiento Energético FEDER 2021–2027](https://www.idae.es/ayudas-y-financiacion/proyectos-innovadores-de-almacenamiento-energetico-feder-21-27), <https://www.idae.es/ayudas-y-financiacion/proyectos-innovadores-de-almacenamiento-energetico-feder-21-27>.

36 Ministerio para la Transición Ecológica y el Reto Demográfico (MITECO) (2025): Programa de la Cadena de Valor Industrial de las Energías Renovables y el Almacenamiento.

37 MITECO (2026): Programa de Refuerzo de la Cadena de Valor under the EU Clean Industrial Deal / Temporary Crisis and Transition Framework-related state aid measures, first call under resolution in June 2026.

38 The Spanish authorities consider that a project creates additional value if it supports resilient and diversified supply chains, not just if it delivers storage capacity. These benefits are rewarded through additional scoring points rather than constituting a mandatory requirement.

39 MITECO and IDEA: Programa RENOINN – Renovables Innovadoras, evaluation criteria relating to positive externalities, territorial impact, and socio-economic benefits.

An aerial rendering of a large-scale industrial and solar project. The image shows several large, rectangular solar panel arrays arranged in rows. Adjacent to these are several large, multi-story industrial buildings with numerous windows. The entire facility is surrounded by green spaces with trees and winding paths. The number '05' is overlaid in a large, pink, sans-serif font in the upper left corner.

05

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Policy Recommendations

1

Provide a central EU repository of national NZIA measures to ensure harmonised and forward-looking NZIA implementation across Member States

Member States should implement Articles 25, 26 and 28 NZIA in a coordinated and transparent way, avoiding fragmented national interpretations that create uncertainty for developers, manufacturers and investors. National authorities should publish clear auction and support scheme roadmaps, specifying which auction will apply non-price criteria, align definitions, component lists, calculation methodologies and verification requirements with the recently published Commission guidance. This is particularly important given the diverging approaches already emerging in France, Ireland, Italy, Lithuania and Spain, making compliance highly demanding for developers.

The Commission should support Member States by establishing a central repository of national measures, auction designs and verification approaches. This would increase transparency and help avoid fragmentation across Member States. EU industrial policy must be able to leverage the potential of the full EU Single Market.

2

Apply strict 'Made in Europe' criteria under the future Industrial Accelerator Act

Early experience with the NZIA shows that the framework effectively supports diversification away from the dominant source of supply, but does not create a strong business case for investment in European manufacturing capacity. The Industrial Accelerator Act should, therefore, deliver strong 'Made in EU' criteria. In the meantime, Member States are already experimenting ahead of the legal framework's entry into force, creating a patchwork of approaches that is both ineffective from an industrial policy perspective and confusing for auction design.

These resilience and 'Made in EU' requirements should preferably be designed as award criteria, rewarding diversified and European value chains without unnecessarily restricting competition or risking undersubscribed auctions.

The Commission should clarify the interaction between the NZIA resilience provisions (3+1 rule) and the future Industrial Accelerator Act's 'Made in EU' requirements to ensure a coherent and predictable regulatory framework for companies, investors and manufacturers. While the NZIA relies on an annually updated assessment of strategic dependencies to determine the application of resilience criteria, the Industrial Accelerator Act is expected to introduce fixed 'Made in Europe' component requirements in a two-phased stage.

3

Establish a Cleantech Manufacturing Bank

Demand-side measures strengthen the business case for diversified and European manufacturing. However, demand-side measures alone will not be sufficient to reach that goal. Resilience and 'Made in EU' criteria must be complemented by dedicated production-linked financing, including CAPEX and OPEX support, to close the cost gap for European PV manufacturing and enable the NZIA's 30 GW manufacturing objective to be met.

International examples have demonstrated the effectiveness of such an approach. India's Production Linked Incentive (PLI) scheme provides production-based support to encourage integrated domestic solar manufacturing, while the US Inflation Reduction Act (IRA) offers long-term manufacturing credits that have attracted investment across the solar value chain in the US. Building on these successful models, Europe requires an equivalent instrument tailored to its own industrial objectives. The future European Competitiveness Fund or reformed Innovation Fund should include targeted clean tech and solar manufacturing support to strengthen diversified and resilient supply chains.



© Heliup, Jerome Mauchamp

Solar Storage Flexibility

Rond-point Robert Schuman 3,
1040 Brussels, Belgium

info@solarpowereurope.org
www.solarpowereurope.org

