

# The SSI Supply Chain Traceability Standard: Pilot testing & Public Consultation

Prior to its official publication on 12 December 2024, the Solar Stewardship Initiative (SSI) Supply Chain Traceability Standard has been refined through a comprehensive process that included thorough reviews, pilot testing, and an open multi-stakeholder consultation. Designed to serve as a comprehensive resource for solar companies, the Standard enables third party independent assessment bodies to evaluate traceability effectively.

To uphold the SSI dedication to transparency, this document provides a summary of anonymised findings from the pilot and consultation phases, alongside an overview of the key revisions integrated into the final version of the Standard.

## PILOT ASSESSMENTS: SUMMARY RESULTS

### Objectives & Scope

The SSI Pilot Assessments were intended to:

- sense-check the SSI Supply Chain Traceability Standard and Assurance System.
- understand the current average performance of participating sites to adopt and maintain a traceability management system for the flow of materials through its operating processes, both internally and with outsourced contractors, including the maintenance of verifiable information and processes obtain insights into challenges and opportunities associated with evaluating the Standard within a high-capacity, industrial-scale environment

The SSI Pilot Assessments were conducted:

- in Q4 2024 by SSI Secretariat Staff
- at 14 sites
- covering all segments of the silicon solar PV module supply chain from polysilicon to module.

### Lessons Learned

- The majority of the changes suggested by pilot participants were regarding providing further clarification of technical due diligence and complaint mechanisms requirements, allocation of resources for management systems, terminology and adding new mapping requirements.
- Efforts are being made to address traceability and transparency in the solar sector, but the SSI is needed to address gaps and offer sector-wide consistency. Some sites have been subject to traceability audits, mostly commissioned by their customers. All pilot sites already had a traceability management system in place, with Senior Leadership commitments and clearly assigned roles and responsibilities.
- At certain sites, staff responsible for monitoring and traceability require further training. While most sites demonstrated a solid understanding of the necessary documentary evidence to verify the origin and trace materials fully upstream, obtaining this documentation consistently would result in increased costs. All sites expressed the need for a standardised and uniform set of supply chain traceability requirements that could be applied across the industry, helping to balance and manage these additional expenses.

## PUBLIC CONSULTATION: SUMMARY RESULTS

### Objectives & Scope

The SSI Public Consultation was intended to:



- To enhance transparency and accountability: Public consultations allow stakeholders to understand and evaluate the criteria and practices behind SSI Standards. This process ensures that the development and revisions of standards are open, fair, and subject to external scrutiny, which is essential for building credibility and trust.
- To incorporate diverse stakeholder feedback: By actively seeking input from a range of stakeholders—including businesses, advocacy groups, community representatives, and industry experts—consultations gather varied insights that make the SSI Standards more inclusive, relevant, and aligned with real-world needs.

The SSI Public consultation on the SSI Standard was launched on 21 August 2024 and closed on 21 October 2024. There were 23 official respondents to the public consultation. Discussions were held in parallel with a number of NGO and academic stakeholders on labour and human rights.

**Results:**

- 23 respondents
- 19 respondents were from Europe, with 2 from China, 1 from India and 1 indicated as "Global".
- 79% of participants agreed that, due to the high-risk nature of silicon in the solar sector, the scope of the SSI Supply Chain Traceability Standard should initially focus on silicon and other semiconductor materials.
- 53% of participants agreed that the SSI Supply Chain Traceability Standard covers the entire value chain, from quartz mining to module production.
- Respondents highlighted that the Standard requires clarification on several points, including when and how sites can opt out of certified materials and the feasibility of segregating non-certified materials to maintain compliance. A phased, risk-based approach for implementation is recommended, particularly for extending traceability beyond polysilicon and gradually incorporating other materials like glass. Additionally, stakeholders highlight the need for the Standard to align with evolving expectations from buyers and investors who already demand broader traceability.
- 58% of the participating organisations agreed that the Standard should implement segregation requirements within the chain of custody model, using a progressive approach. This would begin with mandatory requirements for part of the value chain, gradually expanding to cover the entire value chain.
- 47% of participating organisations agreed that the draft requirements of the Standard sufficiently meet client and consumer expectations. Respondents suggested extending assurance measures to cover all manufacturing facilities to ensure uniform application of traceability procedures. They also recommended providing a clear list of digital tools for material tracing, incorporating traceability for recycled materials to support circularity, and ensuring transparency in the supply chain by sharing information about trading partners.
- 53% of respondents agreed that the requirements of the SSI Traceability Standard effectively address and support relevant regulations. The feedback highlighted the need to integrate evolving regulations, such as the EU Forced Labour Product Ban, into the requirements for solar panel manufacturers. Additionally, it emphasized the importance of establishing safeguards to enable the secure exchange of supplier information while ensuring confidentiality and adherence to regulatory standards.

**UPDATES TO THE STANDARD FROM PILOT & CONSULTATION**

Category	Modifications – the final Standard has:	Triggered by
<b>Certification limits</b>	Added further clarification on the SSI not certifying sites complicit in forced labour; there is clear language that no assessments or certifications in sites or regions that are not freely accessible to assessors.	Public consultation feedback



<b>Not replacement of legislation</b>	Added further language to clearly state that the SSI Standards do not act as a replacement for EU and national legislation on sustainable supply chains, nor does SSI membership negate a business' liability to comply with law and perform its own environmental and human rights due diligence.	Public consultation feedback
<b>Full value chain</b>	Re-emphasised that both ESG Standard and Traceability Standard apply to full value chain.	Public consultation feedback
<b>Alignment with other frameworks and standards</b>	A text to clarify which other frameworks and standards have been used in the development of the SSI Supply Chain Traceability Standard development has been added, for alignment and inspiration purposes – p.7 of the v1.	Public consultation feedback
<b>Terminology</b>	Further streamlined the terms use, new terms have been added. E.g."facility" vs "site", definition of a trader.	Both
<b>Complaints mechanism</b>	Further clarification on the complaint's mechanism that the set-up of the mechanism can be developed as a standalone or as a part of the existing mechanism	Both
<b>Allocation of resources</b>	Elaborated the requirement on allocation of resources for management system implementation to make it clearer – requirement 1.2.2	Public consultation feedback
<b>Approved suppliers</b>	Introduced the new term "approved suppliers" for requirement 2.1; The Facility shall have a process in place to ensure that it receives materials within the scope of the Standard only from <b>approved suppliers</b> who can demonstrate a traceability system meeting the requirements of the SSI Supply Chain Traceability Standard. In the future, the Facility shall have a process in place to ensure that all certified materials are purchased from SSI Certified Suppliers.	Both
<b>Traders</b>	Added a new section with due diligence and mapping requirements in case of use of traders – section 2.7 of the v1.	Both (from the pilots it was more focused on upstream)
<b>Documentation</b>	Elaborated on the requirement on the documentation expectations on transactions – requirement 2.5.3	Pilots
<b>Glossary</b>	Updated the glossary, new terms added: "approved supplier", "due diligence", "trader".	Both
<b>Annex I</b>	added the material transfer record template.	Pilots
<b>Annex II</b>	added the supply chain documentation list.	Both
<b>Annex III</b>	added the segregation model.	Public consultation feedback

Additional changes are planned to update the following Core Documents to align with the final Supply Chain Traceability Standard requirements:

- Assurance Manual
- Claims Guide



- Assessment Body and Assessor Approval Procedure

In addition, the SSI will work on the development of the Supply Chain Traceability Standard Guidance in 2025 to further clarify the requirements of the Standard for the facilities and assessors.

Further discussion will take place with the SSI Board regarding the transition period and progressive targets, the expansion of scope and coverage.

