

CSDDD Implementing Guidelines Consultation

Solar Stewardship Initiative Response

Introduction

The EU's Corporate Sustainability Due Diligence Directive (CSDDD) is a vital piece of legislation as it moves responsible business conduct from a largely voluntary expectation to a clear legal duty for companies with significant influence over global value chains.

By requiring companies to identify, prevent, mitigate, bring to an end, and account for actual and potential adverse human rights and environmental impacts in their own operations, subsidiaries, and chains of activities, the CSDDD creates a more consistent framework for responsible supply chains across the EU and beyond. This is particularly important in sectors such as solar, where rapid growth to support the energy transition must be matched by credible due diligence, greater transparency, and practical tools that help companies understand and address risks throughout complex upstream supply chains.

[The Solar Stewardship Initiative \(SSI\)](#) fully supports the Corporate Sustainability Due Diligence Directive (CSDDD) and strongly believes that robust legislation globally is essential to driving meaningful change in supply chains. The CSDDD's recognition of Multi-stakeholder Initiatives (MSIs) is a concrete step that supports businesses operating in the EU to understand and meet their due diligence requirements. Through MSIs and their certifications, based on third-party independent audits, businesses can make more informed risk assessments about potential adverse impacts in their supply chain, and accordingly develop prevention measures and/or corrective action plans. While MSI membership and/or certification should not create a presumption of absence of adverse impacts in the supply chain, they can provide independently verified and standardised information and encourage shifts in company behaviour. As recognised under the CSDDD, participation in MSIs further helps to reduce the burden on companies by offering grievance/complaints and appeals mechanisms.

Furthermore, the SSI notes and welcomes the recognition of the role of independent third-party audits, MSIs, and their certifications within the evidence base of recently published Implementation Guidance for the EU Forced Labour Regulation.

About the SSI

The Solar Stewardship Initiative (SSI) is a global, multi-stakeholder assurance scheme established to strengthen responsible, transparent, and sustainable solar value chains. Bringing together manufacturers, buyers, civil society, finance, human rights experts and other stakeholders, the SSI provides a practical framework for companies to assess and improve environmental, social, governance, and traceability performance across solar PV manufacturing. Its role is to support credible due diligence in a fast-growing sector by combining sector-specific standards, independent third-party assessment, public certification, and continuous improvement mechanisms. By offering site certification against its two standards on **ESG and Supply Chain Traceability (SCT)** the SSI actively supports companies performing due diligence on their supply chains by providing technically-tailored, standardised, and independently verified information about their suppliers.

The **SSI ESG Standard** is designed around 96 criteria, structured across three core dimensions: 23 criteria for Governance and Business Ethics, 21 criteria for Environmental performance, and 52 criteria for Human and Labour Rights. It is used to evaluate the ESG performance, including due diligence on responsible sourcing, at a **manufacturing site**.

The **SSI Supply Chain Traceability (SCT) Standard** is designed to establish requirements for a **manufacturing site** to trace the materials it sources, from raw quartz mining, through to modules. It is structured around a set of defined criteria focused on supply chain transparency, chain of custody, and responsible sourcing practices, and is used to evaluate the robustness and integrity of traceability systems at the site level, ensuring that materials can be reliably linked to verified sources and production processes.



The SSI assurance scheme is based on **on-site, independent third-party assessments**. These are more robust and credible than voluntary disclosures and self-assessments because they assess compliance to standard requirements in an impartial manner.

Qualified and impartial assessors review policies, procedures and practices at a specific manufacturing site to determine if the SSI Standards are implemented and effective. **Unsupervised interviews with external stakeholders and workers** also take place and any information received is cross-checked to support assessment conclusions and obtain an accurate picture of the site's practices at the time of the assessment.

The SSI was created in response to growing demands for greater transparency, accountability, and robust human rights due diligence in solar PV supply chains, including in upstream manufacturing. As the solar sector scales rapidly to support the energy transition, this growth must be underpinned by strong ESG standards and credible supply chain traceability to ensure that decarbonisation does not lead to adverse impacts along supply chains.

Active SSI Site Certifications (As of 31 July 2026)

	Step in the polysilicon solar module supply chain						
Standard	Module	Cell	Wafer	Ingot	Polysilicon	Metallurgical Grade Silicon	Quartz (Mine)
ESG	12	1		1	1		
SCT	9	1		1	1		

- Total number of active certifications: 27
- Total number of sites certified: 16
- Total number of double-certified sites: 11

The SSI is currently updating its estimation of certified capacities. As of the end of 2025, we can say that the SSI had ESG-certified 110 GW of module capacity, 22 GW of cell capacity, and 11 GW of wafer/ingot capacity.

It is important to note that the first ESG certifications were issued in late 2025, and the first SCT certifications were issued in recent months of 2026. Reflecting the urgency of the energy transition, the SSI system is working quickly to independently verify ESG and traceability system performance at solar manufacturing sites.

Determining the fitness of a Multi-Stakeholder Initiative

Robust and well-designed Multi-stakeholder Initiatives play a critical role in the implementation of Europe's world-leading supply chain sustainability legislation. MSIs do not replace legislation, nor do they exempt companies from their legal obligations, however they do provide independent, standardised, and tangible tools to support compliance.

In order to be deemed fit-for-purpose, based on the SSI experience of rapidly rolling out a robust system, MSIs should be designed with certain characteristics in mind:

1. Multi-stakeholder governance

Governing Boards of MSIs should meaningfully include **non-industry voices** and reach decision via equally weighted voting powers between industry and non-industry stakeholders. This supports the integrity and independence of the system, and prevents the case of industry 'marking its own homework.' The Board should have final authorisation and oversight over Standard design, membership, certification, and work plans.

Multi-stakeholder governance should be reflected throughout the MSI's work i.e. ensuring there are structures in place to ensure the voices of both industry and non-industry are properly reflected in discussions and decisions. For example, the SSI has a Stakeholder Advisory Group for non-Industry stakeholders to provide feedback on the work of the Initiative and advise the Board. Industry and non-Industry members are also part of working groups on specific areas, such as developing or revising new Standards or commitments. All non-industry stakeholders should be independent of industry.

Since [May 2025](#), the SSI Board features 12 voting seats, with 6 for non-industry members. These seats currently include representation from human rights experts, climate NGOs, and the international finance community.

2. Membership

MSIs should conduct preliminary due diligence on prospective members to assess whether they are seeking to join Initiatives in good faith, and with real commitments to implement Standards at their manufacturing sites and in their supply chains. This procedure should be standardised and the methodology publicly available.

Preliminary due diligence procedures should ensure that entities who are committed to change can access the support of MSIs to do so.

MSIs may introduce pre-membership categories to provide pathways to organisations who are not yet ready to be labelled as members, so they can access support mechanisms to improve their practices.

For example, the SSI publishes its Pre-membership Due Diligence Procedure and Policy of Disassociation on [its website](#). The SSI is also introducing a candidate pathway to membership to offer more formalised support to organisations that are not yet ready to be full members.

MSIs should have a clear policy of disassociation in the case a member is asked to leave the Initiative due to disengagement with the process or other breaches of Initiative rules. Membership admission should be decided by a Multi-stakeholder Board, as is the case with the SSI.

MSI Membership for suppliers/manufacturers should be conditional on the delivery of concrete commitments to improve ESG and traceability performance in their operations. For example, the SSI requires its members to submit two sites for assessment against both SSI Standards within 12 months of joining. Members must continually submit new sites for assessment and take up Standards across their operations.

MSI Membership for those procuring or manufacturing should also be based on their commitment to continually promote ESG and Traceability standards with their suppliers and in their supply chains. While this can be harder to quantify, the SSI requires its buyer members to sign the same SSI Principles as manufacturer members upon joining. This means that both buyers and manufacturers should encourage their suppliers and upstream partners to meet SSI Standards in their operations.

3. Standards

MSIs should be based around ESG and/or Supply Chain Traceability Standards which are developed through a best-practice process; **ISEAL** or equivalent. This means that Standards are subject to multi-stakeholder consultation and piloted in the real world before being used to conduct assessment and issue certifications. The conclusions of consultations and pilots, and where the Standards have subsequently been updated, should be made publicly available.

The development process of the SSI Standards, including the pilot and consultation reports, are available online [here](#).

4. Quality & Independent Assessment

MSIs should only authorise qualified, third-party, independent assessment (i.e. audit) bodies to conduct assessments against their Standards. Assessment must be unsupervised and only conducted in freely accessible regions.

Drawing on SSI practice, assessment bodies should meet recognised international standards such as **ISO/IEC 17065 or ISO/IEC 17021**.

Individual assessors must be trained and examined against the Standards that they assess performance on. Assessment teams must have experience and qualifications in line with the type of Standard they are conducting assessments for (i.e. they should have representation from labour experts, environmental experts, and so on). For example, the SSI mandates that an expert in human rights is part of any assessment team.

Companies/sites should be assessed by different assessment bodies over time. For example, under the SSI system, the same assessment body is only allowed to conduct three consecutive assessments for one company, before another body must be brought in.

Assessment processes must be standardised, transparent, and verifiable. For example, the SSI has a publicly available [Assurance Manual](#) that sets out how assessments must be conducted.

Assessment methodologies should include a range of approaches, including document and data review (e.g. policies, disclosures, and self-assessment questionnaires), on-site audits and visual inspection, remote audits, interviews with management, and unsupervised interviews with workers. A list of examples of information that should be considered by assessment processes can be found in the annex.

To support alignment with existing Guidelines, the European Commission should note that the Forced Labour Ban Implementing Guidelines detail the types of information that can be considered as part of its evidence base (4.7.1 – 4.7.3.5). The SSI assessment methodology already considers most of these information points as part of assessments. These information points are a good point of reference to evaluate the robustness of an MSI's assessment methodology.

5. Certification

MSIs may issue certifications against sites, products, or business activities based on the independent assessment of subjects against their Standards. These certifications should be time-bound, and subject to surveillance. For example, an SSI certification applies to a manufacturing site, and is valid for three years after an initial assessment, but must pass surveillance assessments 12 months and 24 months after its initial assessment.

A public record of active certifications, and their scope (e.g. expiry date, site details, level of certification, etc.) should be made available. Where possible, MSIs may also provide public summary reports explaining the assessment conclusions and the justifications for the certifications.

For example, the public SSI Certification library can be found [here](#), and includes public summary reports for each site certification.

MSIs should provide clear guidance on the scope of their certifications, and how their certifications should be used for buyers/procurement stakeholders. For example, the SSI provides a publicly available [Buyers' Guide](#).

As no single tool gives a complete picture of risk in a value chain, Buyers should systematically combine data and support from MSIs with other evidence points as part of their due diligence processes. Data triangulation increases accuracy and reduces the likelihood of relying on incomplete or biased data. For example, the SSI advises its Buyer category members to consider:

- SSI-verified information (certification results, audit trends, CAPs, complaints)
- External intelligence (NGO investigations, news, worker-voice data)
- Technical and sector standards (RBA, SA8000, IRBC, mineral initiatives)
- Geographic-risk profiles (forced labour prevalence, governance quality, conflict risks)
- Internal procurement knowledge (past performance, delivery reliability)

6. Continuous Improvement

In line with **OECD Due Diligence Guidance on Responsible Business Conduct**, MSIs should support industry to continually improve their ESG performance and traceability systems. This can be done through progressive levels of certifications, maintaining the robustness of the certification while incentivising the implementation of improvement plans.

For example, if a site attains SSI certification, it can do so at three levels; Bronze, Silver, Gold. For any level less than Gold, or if a site does not attain certification, it receives a corrective action plan that is monitored through engagement with the Secretariat and follow up independent surveillance assessment(s). The site then may achieve a higher level of certification.



7. Claims

MSIs should be vigilant against potential greenwashing. MSIs should publish clear guidance about the types of claims that its members can make.

Claims by MSIs and their members (regarding their activity in the MSI) must be accurate, verifiable, and proportionate to the level of assurance achieved, avoiding any risk of misleading stakeholders. For example, under the SSI system, claims can only be made by authorised participants and are approved through formal governance processes. Claims must not exaggerate performance, imply broader scope than has been verified through independent assessment, or use vague or promotional language that cannot be substantiated.

MSIs must have robust systems in place to monitor, review, and enforce claims, including corrective actions, withdrawal of claims, or sanctions where misuse occurs, supported by complaints mechanisms and governance oversight. This approach ensures that claims reinforce trust, transparency, and accountability, rather than undermining the credibility of due diligence efforts.

For example, the SSI has a Claims & Communications Guide [here](#), and requests members to submit public claims (press releases, social media, etc.) to the SSI Secretariat for review.

8. Complaints & appeals

MSIs should offer a clear and independent complaints and appeals mechanism to any concerned stakeholder. This mechanism should be designed to process evidenced concerns around the integrity of the assurance and certification system.

For example, the SSI Complaints and Appeals mechanism can be found [here](#).

9. Industry engagement

Beyond the formal assurance and certification process and commitments, MSIs should offer industry the opportunity to connect and exchange more widely on opportunities and challenges in improving supply chain traceability and ESG performance. This could look like target-setting for manufacturers or buyers, capacity-building training or resources to reach further upstream, and/or information exchanges around case studies etc.

As within all industry exchanges, MSIs must ensure clear guardrails with respect to anti-trust and competition laws.

Annex

(Non-exhaustive) Information that can be considered by Assessment Bodies when conducting Assessments on behalf Multi-stakeholder Initiatives:

Economic Operator Actions

- Corporate policies, codes of conduct, governance documents, management oversight responsibilities;
- Training materials for management, employees and suppliers;
- Procurement policies, supplier codes of conduct, contract clauses on prohibition of forced labour and supplier onboarding and monitoring;
- Sectoral risk-assessments;
- Documentation evidencing the establishment of a grievance mechanism;
- Reports on due diligence efforts undertaken, including those in compliance with applicable national and EU laws;

Working Conditions

- Worker interview transcripts and written testimonies;
- Social audits;
- Photos/videos of working conditions and/or dormitories;
- List of workers, employee agreements/contracts, payrolls and financial records;

Product Identification

- Description, name or brand of the product, specific requirements under EU law for the identification of the product, such as HS codes, CN codes, type, reference, model,
- batch or serial number affixed on the product, or provided on the packaging or in a document accompanying the product, or the unique identifier of the digital product passport;
- Product traceability evidence (i.e. chain-of-custody certificates, raw-material traceability data);
- Documentation linking the finished product to its raw material source;
- Bills of materials, especially where relevant to determining the share of components or part of the product potentially made with forced labour;
- Certificates of origin from the sites from which products originate;
- The quantity or volume and value of products concerned (e.g. total units produced, imported, or placed on the EU market during the relevant period);
- Information on the inventory and distribution and storage locations, including for distance sales, within the EU.

Supply Chain Structure

- Description of the supply chain, covering key stages of production, manufacturing or mining;
- List of manufacturers, producer and suppliers with regard to key production steps, including the following data for each of them: name, trade name or registered trademark, contact details, unique identification number in the country in which they are established and, where available, their Economic Operators Registration and Identification (EORI) number;
- Supply chain maps covering tiers and sub-tiers and showing both direct and indirect suppliers;
- Information on ownership structures and relationships between suppliers and the economic operator and any third-party intermediaries (e.g. subsidiary, joint-venture, independent contractor);

Facility & Logistics

- Identification of locations and facilities at key extraction, harvest, production, manufacturing, or mining stage (names, addresses, operating entities);
- Purchase orders;
- Invoices and receipts for all suppliers;
- Packing lists;
- Payment records;
- Supplier and buyer inventory records, including dock/warehouse receipts;



- Shipping and transport documentation (manifests, bills of lading for air, sea, or land transport);
- Import/export records.
- Production orders;
- Factory production-capacity reports;
- Evidence demonstrating consistency between input volumes and output volumes for the product(s) extracted, harvested, manufactured, produced or mined.

Further Materials

All SSI Core Documents can be found [here](#).

Document	Document details
Assessment Body and Assessor Approval Procedure	How assessment bodies and individual assessors become authorised to conduct independent third-party assessment on behalf of the SSI.
Assurance Manual	How assessment bodies conduct consistent and quality, assessments of manufacturing sites' performance against the SSI Standards.
Claims & Communications Guide	How SSI members are permitted to communicate about their participation in the Initiative and/or their certifications.
Complaints and Appeals Mechanism	How any stakeholder can submit a complaint or concern about the SSI system.
ESG Standard	A set of almost 100 criteria that sets the Standard for ESG performance at solar manufacturing sites.
Governance Terms of Reference	How the SSI Multi-stakeholder Governance is structured and maintained.
Membership fees terms and conditions	How the SSI membership payment model works.
Policy of Association	How the SSI may admit or remove a company to/from its membership.
Pre-Membership Due Diligence Procedure	How the SSI assesses that a company is applying to join the SSI in good faith, and has met a sufficient level of readiness.
Recognition Process	How the SSI system recognises other assurance systems.
SSI Buyers' Guide	How solar buyers may integrate the SSI system into their responsible procurement practices.
SSI Principles	This sets out the commitments that new SSI members must commit to in order to join the Initiative.
SSI Principles – Annex 10	This sets out the SSI's manufacturer members export commitments.
Standard Setting and Review Procedure	How the SSI develops its Standards.
Supply Chain Traceability Standard	An extensive set of criteria which sets the Standard for how material traceability systems are implemented at a manufacturing site.

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