SOLAR STEWARDSHIP INITIATIVE

August 2026

Bill C-35 Consultation

Solar Stewardship Initiative Response

Introduction

Canada's Bills C-35, *An act respecting the prohibition of the importation of goods produced by forced labour,* is a vital piece of legislation as it moves forced labour import prohibition from a legal obligation to a more effectively enforced requirement. By establishing a forced labour import ban as a standalone statute with strengthened and streamlined processes and mechanisms to prevent goods tainted by forced labour from entering the country, aligning with approaches taken by key global partners, Bill C-35 should create a more consistent framework for responsible supply chains. 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 Bill C-35, along with the potential complementary due diligence measures, and strongly believes that robust legislation globally is essential to driving meaningful change in supply chains.

Through Multi-stakeholder Initiatives 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 in the EU's Forced Labour Regulation Guidelines, participation in MSIs can help a company effectively take action against the risks of forced labour in its supply chains.

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 manufacturing sites' certification against its two standards on **ESG and Supply Chain Traceability** 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**. Where appropriately designed and independently implemented, third-party assessment can provide more reliable evidence than unverified supplier declarations or self-assessments.

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.

Key questions for input

Part 1: General questions
These questions relate to the overall approach for identifying and adding entries to the list. The questions are intended to guide your input. You are welcome to address any or all of them, and to raise other considerations you think are relevant to how the list should be developed.

1. **Evidence:** What sources should Canada rely on to identify goods at risk of forced-labour production?

No single source is sufficient. Listing decisions should rest on the triangulation of multiple verifiable and up-to-date sources. Care should be taken to utilize primary sources (i.e. not duplicated older information).

The SSI recommends drawing on:

→ Institutional sources like the OECD, UN, and EU.

→ **Independently verified sectoral information.** Public certification decisions and summary reports issued by credible, sector-specific assurance schemes provide independently verified and standardised information.

→ **Stakeholder information.** Verifiable and trustworthy civil-society reports, whistleblower alerts, trade union submissions, worker testimony and media investigations can be used to help identify risks, particularly upstream or in high-risk regions.

2. **Unit of listing:** Under C-35, entries on the list would identify goods specified by producer, countries or regions, or both. What considerations should apply when choosing how to specify a particular good on the list?

→ The unit of listing should be precise. The list should only include specific entities, geographic regions or products and should be based on solid and verified information from reliable, and up-to-date sources.

- → **Make entries technically usable.** Entries should carry product identification sufficient for customs use, and, where producers are named, legal and trade names, known subsidiaries and available identifiers.

3. **Relationship to existing measures:** How should C-35 complement existing legislative, regulatory, and policy measures to address forced labour in supply chains?

- → See our answer to Question 8 on international alignment, covering how C-35 can complement existing overseas measures to address forced labour in supply chains.

4. **Civil society and worker input:** What role should civil society organizations, workers, and others with knowledge of supply chains play in identifying goods at risk of forced labour? How can the process enable them to share information effectively, including where those providing it may face risks?

- → **Multi-stakeholder assurance schemes can complement the information gathering process**. For example, SSI assessments require unsupervised, on-site interviews with workers and external stakeholders, representative of shift patterns, worker types and gender, with management not present and findings discussed with management only in general terms. Information gathered could help in identification of goods at risk of forced labour.
- → As a multi-stakeholder initiative, the SSI recognises **that reliable and up-to-date civil-society reports, whistleblower alerts, media investigations and other stakeholder inputs** are useful in identifying risks, particularly upstream or in high-risk regions.
- → **A clear submission route.** Canada should establish a single, publicly accessible point for submitting information, with published guidance on what to submit, acknowledgement of receipt, and communication of the outcome within a reasonable time frame. Submission should be possible directly, through an intermediary, or anonymously.
- → **How submissions are used.** Credible, updated information should be treated as a trigger for further investigation and evidentiary gathering, with enforcement decisions based on cumulative, triangulated evidence rather than single-source allegations.
- → **Resourcing.** Civil society actors face increasing resource pressure and budget constraints, which limits their capacity to engage in structured processes of this kind. The implementation on C-35 should consider how civil society participation can be supported.

5. **Review and delisting:** What process should be available for producers and importers to request a review of, or removal of an entry where they believe the association with forced labour no longer applies or was made in error?

- → Any process to place a product on the list or to evaluate a product's position on the list should be standardised, transparent, and be based on up to date and verified evidence.

6. ~~**Effects of listing:** What effects should be weighed when deciding whether to list goods, particularly the effects on the workers the prohibition is meant to protect?~~

7. **Implementation supports:** What supports would help businesses comply, such as guidance, digital tools, transition periods, and outreach?

- → **Guidance published in advance of application,** sufficiently ahead of requirements taking effect to allow contracting cycles and supplier engagement to adjust.
- → **A standardised documentation set,** developed with the sectors concerned, setting out the documents expected for goods under review. This gives importers a predictable route to compliance and reduces inconsistent requests at the border.

→ **Published fitness criteria for multi-stakeholder initiatives** so companies and authorities can use a standardised methodology to evaluate the effectiveness of MSIs and their certifications in supporting compliance.

→ **Sector-specific guidance and FAQs.** Risks differ across sectors. Guidance developed with sectoral bodies would improve both compliance and enforcement quality. The SSI is ready to contribute further solar-specific input.

→ **A practical self-assessment tool** allowing companies to assess whether their internal due diligence systems align with the Act. Inspiration can be drawn from the UK Modern Slavery Assessment Tool (MSAT), designed to help organisations work in partnership with suppliers to reduce the risk of exploitation of workers in their supply chains.

→ **Training and capacity building** on supply chain mapping and traceability documentation for upstream tiers, on forced labour risk indicators such as recruitment fees, migrant worker risks, excessive overtime and subcontracting, and on remediation practices aligned with OECD Guidelines on Responsible Business Conduct and UN Guiding Principles on Business and Human Rights.

→ **Digital tools,** including traceability platforms and harmonised reporting templates, alongside a single public portal carrying the list, guidance and decisions.

→ **Support targeted at smaller businesses,** including a contact point, and recognition that smaller buyers may rely on independently audited manufacturers rather than auditing every tier directly. Transition periods for SMEs could also be made longer than for large companies, giving them time to build capacity and meet requirements (including for due diligence) without disproportionately impacting their operations.

8. **International alignment:** How should Canada's approach relate to those of key partners that are also working to address forced labour and other forms of labour exploitation in supply chains?

→ Canada's framework will be most effective where it is aligned with those of its partners. Divergent requirements imposed on the same suppliers increase cost without improving outcomes for workers.

→ **Anchor in the same international instruments.** Canada should align its expectations for company conduct with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights, as the EU has done in the Corporate Sustainability Due Diligence Directive and the EU Forced Labour Regulation. A shared conceptual base is what makes practical interoperability possible.

→ **Align the operational detail,** particularly the indicators used to identify forced labour, evidentiary standards, the documentation importers must produce, and the timelines for producing it. Recognition of evidence already accepted by partner authorities would reduce duplication substantially. See: The EU Forced Labour Regulation Implementing Guidelines.

→ **Recognise the risk of fragmentation.** Experience with the implementation of the U.S. Uyghur Forced Labor Prevention Act has shown that unilateral regulatory approaches can contribute to the emergence of parallel supply chains, reducing transparency and fragmenting traceability systems. Recognition of initiatives such as the SSI, which apply common requirements globally rather than by origin market, can help counteract this.

→ **Apply the prohibition to all and tailor enforcement.** Reflecting the EU Forced Labour Regulation, the prohibition should apply to all operators. Differentiation belongs in how investigations and information requirements are applied, taking account of proximity to the alleged forced labour, leverage to bring it to an end, size and resources, and supply chain complexity. To support effective implementation, c-35 or relevant guidelines should clarify what information each actor should be able to demonstrate at their respective tier.

→ **Complementary due diligence requirements.** The SSI supports human rights and environmental due diligence being mandated in law, alongside border measures, with a progressive scope allowing smaller companies longer to comply.

Part 2: Information requirements and associated impacts
These questions concern the information that importers of listed goods may be asked to provide.
Drawing from international examples, four models of supply chain tracing information may be considered for a Canadian approach:

- **Overall supply chain information** identifies the parties, locations, and stages involved in producing a good, allowing potential forced labour risks to be assessed throughout the supply chain.
- **Supplier and entity documentation** verifies the identities and relationships of suppliers, manufacturers, and other entities, helping determine whether there are links to known forced labour concerns.
- **Merchandise and transaction records** provide information on the origin, movement, and sale of goods, helping substantiate supply chain claims and trace products back to their source.
- **Production and traceability information:** links goods and inputs to specific production facilities and processes, enabling verification of where and how goods were produced and whether high-risk sources were involved.

The introduction of information requirements carries both a compliance burden and options for managing it:

- **Compliance burden:** prescribed information requirements allow for more effective enforcement of the import prohibition, but with associated administrative and financial costs, particularly for businesses with complex global supply chains.
- **Measures to manage burden:** the burden can be mitigated through measures such as interoperable digital traceability platforms, harmonized reporting templates across jurisdictions, phased implementation based on risk or value thresholds, and safe-harbour mechanisms for importers with robust due diligence systems.

Discussion questions for information requirements and impacts
You may respond to any or all the questions below and are encouraged to raise any additional considerations that you believe are relevant.
2A - Broad objectives and outcomes

1. ~~What supply chain information and supporting documentation do you currently collect to meet your obligations under *the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)* if applicable?~~

2. What supply-chain information and supporting documentation should importers of listed goods generally be expected to provide to demonstrate that their goods were not produced, in whole or in part, with forced labour?

Expectations should be structured, with a transparent and consistent methodology, while also being proportionate to the importer's position in the supply chain and the information it can reasonably access. Within that framing, the C-35 evidence base may consider:

→ **Supply chain structure and actors:** a description of the supply chain covering key production stages; a list of manufacturers, producers and suppliers with legal name, address and available identifiers; supply chain maps covering tiers and sub-tiers, showing both direct and indirect suppliers; and ownership structures and relationships with intermediaries.

→ **Facility information:** identification of facilities at each key production stage, including operating entity and address.

→ **Product traceability:** chain-of-custody and material-flow controls across production stages, raw-material traceability data, documentation linking the finished product to its raw-material source, bills of materials, and certificates of origin or customs documentation.

→ **Transactional and production records:** purchase orders, invoices, payment and inventory records, shipping documentation, and evidence of consistency between input and output volumes.

→ **Due diligence and site-level evidence:** responsible sourcing policies, supplier codes of conduct, contractual safeguards, supplier risk assessments and screening procedures, grievance mechanism data, corrective action plans, and independent third-party audit reports including on-site assessments and worker interview findings.

→ In polysilicon-based solar PV, meaningful traceability means following material from quartz mine through polysilicon, ingot, wafer, cell and module.

3. What types of information (e.g., traceability information, due diligence records, audit documentation) would most effectively support the verification and enforcement of the forced labour import prohibition?

→ Consistency should be assessed through triangulation across documentary records, worker testimony, third-party audit findings, trade and transaction data and credible external reporting.

→ Importantly, **independent third-party audit reports** are more robust and credible than voluntary disclosures and self-assessments, because they assess compliance against defined requirements in an impartial manner.

→ Where third-party assurance is relied on, its credibility rests on identifiable features such as a harmonised methodology consistent with ISO 19011; assessment bodies accredited to ISO/IEC 17065 or ISO/IEC 17021 by a member of the International Accreditation Forum, or equivalent; a publicly available assurance manual; multi-stakeholder governance and safeguards addressing conflicts of interest; unsupervised worker interviews; and public certification decisions.

→ Notably, certification should not create a presumption of the absence of forced labour. It should be taken together with other evidence. It can provide independently verified and standardised information that can support risk prioritisation and preliminary assessment.

2B - Importer due diligence and compliance expectations

4. What steps are currently taken by importers to ensure the integrity of their supply chains from a forced labour perspective? How do importers ensure that supply chain information received from their suppliers is current and accurate?

→ The SSI is a Multi-stakeholder Initiative/assurance scheme rather than an importer, but our work with manufacturers and buyers gives us visibility of current practice in the solar sector.

→ SSI Buyer Members with mature systems typically combine responsible sourcing policies and supplier codes of conduct, contractual safeguards, pre-contract screening and onboarding due diligence, supply chain mapping and traceability requirements written into procurement, and certification requirements embedded in tender and purchase conditions. The SSI Buyers' Guide was developed to help solar buyers integrate independent assurance into responsible procurement consistently. Practice varies considerably between large developers and smaller buyers.

→ **Independent verification rather than self-declaration.** On-site third-party assessment conducted by independent and qualified assessors. Audits should collect a variety of information, including documentary review, site observation and unsupervised worker interviews, with information cross-checked to obtain an accurate picture of the site's practices at the time of the assessment.

→ **Periodic re-verification,** so that assurance reflects up to date rather than historic conditions.

→ **Triangulation** of supplier data against audit findings, transaction and trade data and credible external reporting.

5. What documentation should an importer be able to submit to support the removal of specific goods from the list?

→ **Triangulation** of supplier data against audit findings, transaction and trade data and credible external reporting. Third-party audits can provide part of the evidence base.

~~6. What timeframe should importers be given to provide the prescribed information after their goods have been listed and a request for information has been issued?~~

7. How should the Government balance the need for detailed supply chain documentation with the administrative requirements placed on importers, particularly SMEs?

→ The prohibition itself should apply to all economic operators. Proportionality belongs in how information is requested and how enforcement is applied, not in who is covered.
→ Information expectations should reflect the risk profile of the good, the tier at which the risk sits, and the importer's size, resources, proximity to the alleged forced labour and leverage to prevent or address it. Larger companies typically have greater expertise and resources for compliance than SMEs.
→ **Reduce duplication at source.** Harmonised templates, digital traceability platforms, reliance on sector-specific Standards, and alignment with partner jurisdictions would remove a large share of the burden without reducing the quality of the evidence. Much of the cost companies report arises from answering the same question in different formats for different regulators and buyers.
→ **Recognise credible third-party assurance.** Independent assessment against sector-specific standards produces the information authorities need, in a standardised and independently verified form. In complex, multi-tier supply chains, upstream risks often sit several tiers above direct suppliers, and small and mid-sized buyers in particular may need to rely on credible third-party assurance, traceability systems and collective mechanisms rather than direct audits at every tier.
→ **Support rather than exempt.** Guidance, templates, model contractual clauses, training and a dedicated SME contact point are more effective than carve-outs, which risk creating incentives to route higher-risk goods through smaller importers. Where due diligence requirements are introduced, a progressive scope giving smaller companies longer to comply builds capacity rather than excluding them.

2C - Commodity types and required documents

8. Should the types of documents required from importers vary by commodity or sector? If so, what forms of information is most appropriate for different categories of goods (e.g., raw materials, agricultural products, manufactured goods, or complex products with multi-tier supply chains)?

→ Yes, differentiation in requirements between sectors is important. **For complex products with multi-tier supply chains,** such as solar PV, documentation must reach beyond the final assembler. The relevant evidence is supplying chain mapping to the tier at which the risk sits, chain-of-custody or material-flow controls across production stages, and input-to-output volume reconciliation.
→ Solar illustrates why differentiation matters. At module and cell level, companies generally demonstrate greater maturity in ESG, responsible sourcing and traceability practice, are more familiar with sustainability frameworks, and can provide comprehensive documentary and transactional evidence. Further upstream, at quartz mining and polysilicon manufacturing, evidence collection is structurally more constrained by material commingling, the use of multiple intermediaries, spot-market transactions and limited standardisation of proof-of-origin documentation. Requiring an identical documentary set at every stage would produce a false sense of assurance at the tiers that matter most.
→ Sector-specific guidance should be developed with sectoral bodies. The SSI, as a multi-stakeholder initiative, would welcome the opportunity to contribute.

9. Are certain types of information, such as transaction records, production records, third-party audits, certifications, or worker welfare assessments, more reliable for particular commodities or sectors? If so, please provide examples.

→ The SSI considers each of these information types are useful in solar supply chain sustainability assurance, provided they are used together rather than individually. The SSI uses these types of information within its own assessment methodology; they have supported certification decisions at manufacturing sites from module through to polysilicon.

→ Importantly, **independent third-party audit reports** are more robust and credible than voluntary disclosures and self-assessments, because they assess compliance against defined requirements in an impartial manner.

→ **Certification is more reliable where its governance is verifiable,** through well-developed Standards, publicly available and standardised audit methodologies, accredited assessment bodies, multi-stakeholder governance, conflict-of-interest safeguards and public certification decisions.

→ Worker interviews, grievance logs and payroll records should be obtained with full site access and unsupervised worker engagement. The SSI does not accept third-party assessments in regions that are inaccessible, and why sites that cannot be freely accessed cannot be certified.

10. For commodities at high risk of forced labour production, what additional production, traceability, or chain-of-custody documentation should importers be expected to provide, beyond standard commercial records?

→ **Independent third-party assessment of ESG performance at upstream sites,** including documentary review, site observation and unsupervised worker interviews, together with any findings and corrective action plans arising.

→ **Independent third-party assessment of supply chain traceability systems,** to verify that such systems are reliably in place at each site along the chain of custody.

2D - Information sharing and transparency

11. What information should government publicly disclose regarding forced labour enforcement actions?

→ Transparency has an effect well beyond the parties to any individual case. Buyers, financiers and assurance systems use published enforcement information to inform their own risk assessment, which extends the reach of the measure considerably.

The SSI recommends publishing:

→ **The list itself,** in a structured and machine-readable format, with product identification, producer identifiers where applicable, precisely defined geographic scope, effective dates and version history.

→ **The reasons for each listing,** including the criteria applied and a description of the evidentiary basis, to the extent this can be done without compromising sources, petitioners or workers.

→ **What is required to respond,** meaning the information expected of importers of that entry and the tier at which it is expected.

→ **Aggregate enforcement data,** including detentions, releases, refusals and processing times, disaggregated by good and origin, published periodically.

→ Three protections should be preserved. The identity of petitioners, whistleblowers and workers should remain confidential unless they indicate otherwise. Commercially sensitive information provided by importers should not be disclosed where disclosure is not necessary to identify the goods concerned. And Canada should be alert to the risk that disclosure can trigger retaliation against workers, suppliers or local staff in the jurisdictions concerned.

12. What role should industry associations play in sharing best practices and risk information?

→ The SSI is not an industry association but an MSI, please see the annex setting out the fitness criteria that can be used to evaluate the effectiveness of an MSI.

Annex – Setting Fitness Criteria for Multi-Stakeholder Initiatives

Robust and well-designed Multi-stakeholder Initiatives can play a key role in the implementation of 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.
(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.