

To:

Ursula von der Leyen, European Commission President
Valdis Dombrovskis, Executive Vice-President of the European Commission
Margrethe Vestager, Executive Vice-President of the European Commission
Kadri Simson, European Commissioner for Energy
Thierry Breton, European Commissioner for Internal Market
Wopke Hoekstra, European Commissioner for Climate Action

2 February 2024

RE: Trade restrictions on solar photovoltaic (PV) imports would jeopardise the EU's decarbonisation and competitiveness goals

Dear President von der Leyen, Executive Vice Presidents and Commissioners,

I am writing on behalf of Eurelectric, the sector association representing the collective interests of over 3500 European utilities engaged in power generation, distribution, and supply. We would like to raise our concerns over potential trade defence measures on solar products imported to the EU. Imposing such restrictions could significantly delay the adoption of clean electrification, adversely affecting project pipelines and industrial competitiveness.

A timely deployment of solar is paramount to achieve the EU's decarbonisation targets

In accordance with the EU's Climate Law and the 2030 Climate Target Plan,¹ the less action the EU takes this decade, the steeper and more challenging the reduction path after 2030 will be. A 55% greenhouse gas (GHG) reduction by 2030 requires the installation of at least 600 GW of solar capacity by 2030. This means our industry has to triple today's solar deployment² in less than 6 years. It is in the EU's interest to avoid any delay to this formidable undertaking.

Competitive clean electrification is a pillar of the EU's industrial policy

Electrification is a key enabler of industrial competitiveness as the most direct and efficient decarbonisation pathway. Timely deployment of solar capacity plays a pivotal role in reducing electricity prices and displacing imported fossil fuels.

Having a vibrant manufacturing sector in Europe is also a success factor of the Green Deal. Europe is striving to diversify suppliers and revitalise domestic manufacturing to reach the EU's Net-Zero Industry Act objective to re-shore 30 GW of solar PV manufacturing by 2030. However, as we saw ten years ago, trade restrictions will hamper industrial competitiveness by creating supply chain bottlenecks, affecting renewables deployment. Similarly, local content non price criteria in renewables auctions must be applied with caution considering the current limited manufacturing capacities of the EU's PV industry and avoid slowing down the pace of solar expansion.

Supporting manufacturers without hindering electrification

We need to avoid measures that would adversely impact the delivery of large-scale electrification via delays or cost increases for industrial and residential consumers. Clean electrification is still competing against fossil fuels. Instead, the EU should endorse domestic solar manufacturing with direct support measures. This necessitates, among other things, a well-designed framework compliant with EU State Aid rules, suitable funding opportunities for scaling up European clean-tech supply chains and making sure the level playing field of the Internal Market is preserved.

We trust that our concerns and suggestions will be given due consideration. We are available for a meeting to further discuss these critical matters.

Sincerely,



Kristian Ruby

¹ EU Communication on the 2030 Climate Target Plan [here](#).

² EU reached 220 GW of solar installed capacity in 2023. See Eurelectric Electricity Data Assistant [here](#).