

NTSA

The Non-Toxic Solar Alliance

Position Paper on the Revision of the RoHS Directive

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The Non-Toxic Solar Alliance (NTSA) believes photovoltaic panels should be included in the recast of the RoHS Directive. There are serious concerns within the scientific community that production and use of these panels could potentially cause severe harm to society and the environment.

The European Parliament and Council propose extending the scope of the RoHS Directive to effectively include the photovoltaic industry. Within the industry, there are efforts to exclude solar panels in general from regulation.

The Non-Toxic Solar Alliance (NTSA) advocates against such an overall exclusion. It is crucial to further promote safety and sustainability in the PV industry, especially given the projected high growth rates of solar cells and installations globally. The Alliance does not seek to force any products out of the market immediately, but advocates short-term substitution where non-toxic alternatives exist.

The RoHS Directive should include solar panels

1. **Considering that toxic materials are used in certain types of PV modules, this could potentially lead to unforeseeable risk for the environment, society and the economy. An inclusion in RoHS appears to be the adequate answer.**
 - a. **Based on current scientific knowledge, safe usage of toxic substances in PV modules cannot be guaranteed.** There are no independent and public studies available that prove with certainty that the usage of toxic substances in PV modules constitutes no risks. Risk factors to be considered include leakage, breakage and fire.
 - b. **Current industry efforts for recycling PV modules containing toxic materials urgently require a sufficient safety guarantee.** Doubts arise because of the potential inadequate volume of the financial provisions. Additionally, keeping modules containing toxic substances in a closed cycle over decades constitutes a significant as yet unsolved challenge.
 - c. **There are many PV technologies in compliance with RoHS that do not contain any of the toxic materials currently restricted by the directive.** Manufacturers of these technologies suffer competitive disadvantages from the insufficient regulatory environment. A level playing field is needed, where all are treated fair with the same standards.
 - d. **If RoHS does not regulate the PV industry, low-standard manufacturers will be encouraged to use technologies containing toxic materials.** These producers have little incentive to comply with voluntary standards.
2. **A consequent application of the logic of the RoHS recast would accelerate and strengthen research and development in non-toxic PV technologies.** An effectual timeline to phase-out the usage of the toxic substances is necessary, and a worldwide regulation has to be aspired.
3. **Banning toxic substances from the PV industry within an adequate time span would have no negative effects on the European economy,** but rather stimulate research, innovation and job creation in the green and accountable economy.
4. **A strong non-toxic PV industry is perfectly capable to meet the EU's 2020 climate goals.**

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