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Net Zero Industry Act – Implementing Legislation

Position on the Net-Zero Industry Act's Delegated Act and Implementing Acts identifying the primarily used components of solar technologies and criteria for resilience in public procurement procedures and auctions.

BACKGROUND

EGGA has emphasised, to the Commission, the **importance of including "solar mounting structures, incl. trackers"** in both the list of "primarily used" solar technology components that will be identified through Delegated Act (Art 46.7) and the list of specific components contributing to resilience in public procurement and auctions that is defined through Implementing Act (Art 29.2).

Our [position](#) also aligns with the list of eight essential solar supply chain categories that is supported by the European solar PV sector¹.

This paper explains why "solar mounting structures, incl. trackers", that are increasingly supplied from dominant third countries, must be included in the scope of the Act's implementing legislation.

WHY MOUNTING STRUCTURES AND TRACKERS ARE VITAL SOLAR PV COMPONENTS

Solar mounting structures and trackers must both be included because they:

- Are **primarily used components**; they are **essential, indispensable** and **irreplaceable** components for the production and operation of **different solar PV systems** (agro-photovoltaic, photovoltaic car shelters, etc.) and **not just a simple steel support structure**.
- Are **used in many solar technologies**, including solar PV, solar thermal, concentrated solar power systems, etc.
- Are **specific** components **designed and manufactured by specialist companies** and **selected** for those solar technologies. They are not multi-purpose structures.
- Have a **key structural and technological function**; they must be sturdy enough to withstand extreme weather conditions; provide the structure needed to hold the panels in place at their optimal angles, allowing them to increase the energy yield.

¹ See SolarPower Europe's positions on NZIA (Non-Price Criteria in Public Procurement and NZIA's Implementing Act on Renewable Auctions) that include "solar mounting structures, incl. trackers" among the eight essential solar supply chain categories.

- **Play a key role in determining the reliability, performance and sustainability** of solar technologies because of their structural and technological function.
- Determine the **cost** of the project. If of good quality, efficient and built to last, **they represent a significant share of the value** of a solar ground-mounted plant.

THE IMPORTANCE OF INCLUDING MOUNTING STRUCTURES AND TRACKERS IN THE NZIA IMPLEMENTING LEGISLATION

The application of resilience and sustainability criteria in public procurement and auctions is the aspect that has the highest importance to the EU batch galvanizing Industry.

We strongly urge the Commission to include mounting structures and trackers because:

- All key components in the supply chains of the net-zero technologies, especially those that are heavily, or increasingly, **dependent on imports/threatened by imports**, such as the mounting structures and trackers, should be eligible for the Commission and contracting authorities/entities' **resilience assessment so that the resilience criterion can apply to them, if conditions are met**
- The inclusion of solar mounting structures and trackers in the Delegated Act, Art. 46(7) is necessary in order **to be included in the list of main specific components of Implementing Act, Art. 29(2)** on which the Commission and contracting authorities/entities will conduct resilience assessments.
- EGGA's evaluations and evidence from certain large-scale solar PV installations indicates that the proportion of mounting structures and trackers **originating from China accounts for more than 50% of the supply** of those components. This should be **sufficient to justify** their inclusion in the list of components.
- A lack of official data on imports of mounting structures and trackers, due to the **current unavailability of a specific custom code for those components and their parts does not justify their exclusion**. We encourage the timely development of a specific custom code for mounting structures and trackers to facilitate implementation.
- If EU production of mounting structures becomes increasingly uncompetitive because of the massive import of cheaper mounting structures from a single source, the resilience objectives of the Act cannot be achieved as investment in EU production of these components will be constrained and will create **growing situations of dependency**
- Threats to the manufacturing, investment and employment capacity of these components **jeopardises the scale-up of solar PV technologies**.
- The **application of the sustainability criterion** in public procurement and auctions for solar mounting structures and trackers also **depends on the inclusion of those components**
- These components are mainly manufactured from steel. Their inclusion in the Delegated Act would establish **a valuable platform for the implementation of the Commission's intended Steel and Metals Action Plan**.



The general (batch) galvanizing industry provides the most effective long-term corrosion protection for steel products, through the application of a metallurgically-bonded coating of zinc metal. It is a service that is applied after manufacture of the product and normally on a sub-contract basis. The coating ensuring many decades of maintenance-free durability for vital net-zero technologies, such as solar power installations and wind energy equipment. A galvanized coating is sufficiently durable and robust to provide corrosion protection across more than one product lifecycle. Both zinc and steel are recovered at eventual end-of-life.

The European General Galvanizers Association (EGGA) is the federation of the national galvanizers associations within Europe. The industry comprises about 700 general galvanizing plants (mostly SMEs) employing an estimated 40,000 people in Europe. EGGA monitors and responds to issues affecting the general galvanizing industry in Europe, in particular environmental, technical and regulatory matters. EGGA also provides a platform for coordination of marketing and other initiatives for the industry.

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