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# AMT/NEWSLETTER

## Energy

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### Discussion on PV Panel Recycling System (as of January 2026)

Yoshiaki Otsuki

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## 1. Introduction

Discussions over a recycling system for solar (PV) panels that have reached the specified service life are ongoing in Japan. This newsletter outlines the progress of such discussions, particularly those since the previous year (2025).

Regarding the recycling system of PV panels, certain policy discussions were made during the year 2025<sup>1</sup>. Specifically, discussions were made by a working group of the Ministry of Economy, Trade and Industry and the Ministry of the Environment (the “**Working Group**”) over desirable direction of PV panel’s recycling system.

The Working Group published a summary of their discussions entitled the “Recycling System of Solar Power Generation Equipment” as of March 28, 2025 (this previous document is hereinafter referred to as the “**Roadmap Document**”).

However, thereafter some subsequent deliberations by the government gave rise to temporary suspension of the plan for such a new recycling system for PV panels mainly from the standpoint of the consistency with recycling systems for other products such as automobiles and home

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<sup>1</sup> Please refer to another newsletter of the same author at: [https://www.amt-law.com/asset/pdf/bulletins12\\_pdf/250508.pdf](https://www.amt-law.com/asset/pdf/bulletins12_pdf/250508.pdf), with respect to the previous discussion in 2025.

appliances.

Taking into account such movements during 2025 as noted above, i.e., the previous proposals over the recycling system of PV panes and the suspension of the plan thereafter, the Working Group recently held its 10th meeting as of January 23, 2026.

This newsletter provides an overview, focusing primarily on the document titled "Recycling System for Solar Panels" presented at the 10th meeting of the Working Group (dated January 23, 2026, the "**Meeting Material**").

## 2. Proposal over Solar Panel Recycling System (as of January 2026)

### 2.1. Framework under the Roadmap Document in 2025

First, before introducing the proposals in the Meeting Material at the Working Group held its 10th meeting on January 23, 2026, I will briefly review the recycling system concepts under the Roadmap Document published in March 2025.

With respect to the parties responsible for recycling of PV panels, the Roadmap Document in 2025 indicated two basic policy directions: (i) so-called "generator's responsibility," whereby a person who generates the wastes should bear the responsibility for its proper recycling thereof; and (ii) so-called "extended producer's responsibility," whereby producers should bear a certain level of the responsibility for proper recycling or disposal of their products not only during the phases of production and use, but also the phase of recycling.

In respect of (i) "generator's responsibility," the Roadmap Document proposed that the owner of PV panels who removes PV panels, or a contractor that undertakes such removal or demolition on behalf of the PV owner, be regarded as the "generator," and the relevant costs to such removal and demolition were to be borne by the owner of PV panels.

On the other hand, under the concept of (ii) "extended producer's responsibility," the Roadmap Document proposed that manufacturers of PV panels in principle be the primary bearers of the recycling costs, while, particularly where manufacturers are located overseas, the importers instead would be required to bear such costs, given that manufacturers themselves might no longer exist at the time of disposal of PV panels (p. 6 of the Roadmap Document).

### 2.2. Proposals in the Meeting Material (dated January 23, 2026)

As compared with the proposals set out in the Roadmap Document in 2025, the Meeting Material as of January 2026 introduces certain modifications in the policy direction regarding the concepts of "generator's responsibility" and "extended producer's responsibility" discussed in (1) above.

Under the Meeting Material as of January 2026, a new legislative proposal is proposed whereby a person who intends to "dispose of used solar panels" is designated as the party primarily responsible for recycling (pp. 11 et seq. of the Meeting Material). This concept follows the

aforementioned concept of “generator’s responsibility” which was discussed in the Roadmap Document in 2025.

However, the Meeting Material as of January 2026 has adopted some new concepts. The Meeting Material, among the PV panel disposers, proposes a new concept of a PV operator who intends to dispose of used solar panels which were used in a “revenue-generating business activity” (such category of the disposers are referred to hereinafter “**Revenue-Business Panel Disposers**”). The Meeting Material proposes that the government will establish certain standards for the compliance with by such “Revenue-Business Panel Disposers”, and proposes that such Revenue-Business Panel Disposers be subject to some governmental guidance and advice as per those standards to be established by the government.

According to the Meeting Material, this new concept of the “Revenue-Business Panel Disposers” is assumed to specifically include solar power generation operators, business operators who install PV panels on factories and facilities, and persons who sell electricity generated using solar panels installed on residential rooftops.

Furthermore, the Meeting Material presents a framework in respect of, among the aforementioned “Revenue-Business Panel Disposers”, those who intend to dispose of “large quantities” of used PV panels (such category of the “Revenue-Business Panel Disposers” is referred to hereinafter “**Large-Quantity Panel Disposers**”).

The Meeting Material proposes that such Large-Quantity Panel Disposers be subject to not only the obligations to comply with the government-established standards and with the relevant guidance and advice by the government, but also they be subject to the obligations to submit some disposal implementation plans. In addition it proposes that such Large-Quantity Panel Disposers be subject to some administrative recommendations and orders issued by the government in relation thereto (p. 11 of the Meeting Material). These proposals under the Meeting Material are illustrated as below.

Classification of Operators Subject to Regulatory Measures	Regulatory Measures etc.				
	Responsibility for recycling	Implementation of Measures in accordance with the government’s criteria	Guidance and advice based on the government’s criteria	Notification Obligation of Discharge Implementation Plan	Recommendation and order relating to notification
① a business operator who intends to discharge, etc.* used PV panels. (a business operator who dismantles, removes and disposes of a PV facility by himself, or a business operator who gives such order to a dismantling business operator, etc.)	○	—	—	—	—
② a business operator falling under category ① above who intends to discharge, etc. used PV panels used for its profit-making business (e.g., solar power generators, business operator who installs PV panels in factories and offices, and sellers of electricity using PV panels installed on roofs of houses.)	○	○	○	—	—
③ a business operator falling under category ② above who intends to discharge, etc. a large amount of used PV panels (e.g., a PV operator who discharge, etc. a large amount of PV panels)	○	○	○	○	○

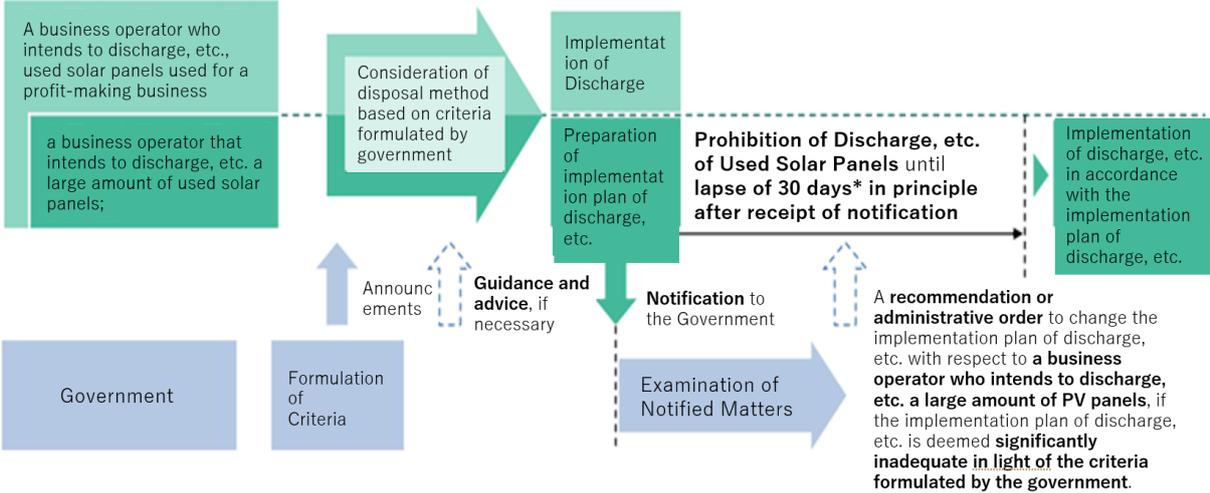
\*“Discharge, etc.” means an order for the work to discharge PV panels removed from a PV facility, excluding discharge, etc. to be undertaken according to an order by another person.

(Source: Page 11 of the Meeting Material)

As described above, the proposals at the Working Group’s 10th meeting (dated January 23) are characterized by introduction of the new concepts such as “Revenue-Business Panel Disposers” and “Large-Quantity Panel Disposers,” which were not discussed in the previous Roadmap Document in 2025. It can be understood that these new proposals in the Meeting Material aim to categorize PV panel disposers into the above-mentioned three gradational groups. It is now anticipated that the scope of the definition of “revenue-generating business activities” or the numerical threshold for what constitutes the “large quantity” will become subjects of future discussion by the government (i.e., the Working Group).

The following figure provides a clear overview of the obligation imposed on Large-Quantity Panel Disposers to submit disposal implementation plans and the procedural flow governing related recommendations and orders.

【From Formulation of the Criteria to Discharge, etc. of Used PV Panels】



\*The period may be extended or shortened at the discretion of the national government if such extension or shortening is necessary for the examination of the notified matters.

(Source: Page 13 of the Meeting Material)

As discussed above, the proposals at the Working Group’s 10th meeting indicate a direction that follows the concept of “generator responsibility” pointed out in the Roadmap Document in 2025, but it now seeks to identify appropriate parties primarily responsible for recycling through further differentiation (classification) of the disposers.

With respect to the concept of “extended producer’s responsibility,” the Meeting Material this time points out that manufacturers or, in the case of overseas products, importers (collectively, “Manufacturers”) are in the position of possessing the most information about the products. This is the same approach which was discussed in the Roadmap Document in 2025. However, there is a difference between these two documents as follows, with respect of the approach of “extended producer’s responsibility.”

The Meeting Material proposes that the Manufacturers be responsible for environmentally-

conscious product's design and be required to provide the information necessary for recycling thereof, in accordance with the framework of the Act on the Promotion of Effective Utilization of Resources (as amended in 2025) (pp. 18 and 27 of the Meeting Material). This proposal is different from the proposals in the Roadmap Document in 2025, in that the Roadmap Document in 2025 proposed a recycling system whereby the Manufacturers themselves are supposed to bear the recycling costs (not only the responsibility for environmentally-conscious product's design and providing information necessary for recycling) (see Section 2.1 above).

### **3. Conclusion**

As outlined above, the solar panel recycling system has now embarked on a new direction after a series of twists and turns since the deliberations during 2025. Moving forward, I will continue to focus on the discussions over the implementation of the recycling system of solar panels.

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