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# AMT/NEWSLETTER

## Energy

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### The Cabinet-approved Bill entitled the “Act on the Promotion of Recycling, etc., of PV Panel”

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## 1. Introduction

Regarding whether to mandate the recycling of solar photovoltaic (“**PV**”) panels, some policy discussions were held during 2025. Nevertheless, thereafter subsequent deliberations by the government gave rise to the temporary suspension of the plan for a new recycling system for PV panels mainly from the standpoint of consistency with recycling systems for other products, such as automobiles and home appliances.

However, subsequently on January 23, 2026, the 10th meeting of the working group of the Ministry of Economy, Trade and Industry (the “**Working Group**”) was held, where a new recycling system was discussed in light of developments during the previous year (2025) as noted above<sup>1</sup>

Following the discussions at the 10th meeting of the Working Group above, the “Act on the Promotion of Recycling, etc., of PV Panel” was approved by the Cabinet on April 3 of this year (the “**Bill**”) <sup>2</sup>. The Bill has been submitted to the 221st session of the Diet currently under operation, and if it passes, it will enter into force within one year and six months from the date of promulgation.

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<sup>1</sup> For the discussions at the 10th meeting of the Working Group, please read the author’s newsletter: [https://www.amt-law.com/asset/pdf/bulletins12\\_pdf/260302.pdf](https://www.amt-law.com/asset/pdf/bulletins12_pdf/260302.pdf)  
<sup>2</sup> <https://www.meti.go.jp/press/2026/04/20260403002/20260403002.html> (Japanese only)

This newsletter provides an overview of the Bill, which was approved by the Cabinet after discussions at the 10th meeting of the Working Group.

## 2. Overview of the Cabinet-approved bill entitled the “Act on the Promotion of Recycling, etc., of PV Panel”

To understand the provisions of the Bill, it helps if you keep the chart below in mind from the official materials submitted by the Working Group:

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.

### 2.1. Responsibility of PV Panel Disposers (General)

Under the Bill, as a basic principle, “PV Panel disposers”<sup>3</sup> are designated as the entities responsible for recycling, and they are required to make efforts to appropriately select the disposal methods including recycling (Article 6 of the Bill). As the wording indicates, this provision does not impose a concrete legal obligation, but merely an obligation to make an effort.

### 2.2. Obligations of the Disposers of PV Panels “used in Business”

At the 10th meeting of the Working Group held in January this year, a framework was presented under which, among PV Panel Disposers, “those who intend to dispose of used PV Panels, etc., that had been **used in revenue business**” would be required to comply with the standards established by the government and would also be subject to guidance and advice in regards to

<sup>3</sup> This means a person who disposes of, or intends to dispose of, PV Panels (Article 2, Paragraph 4 of the Bill).

those standards.

In this regard, Article 7 of the Bill entitled “Matters to Serve as Standards for the Judgment of Business-use PV Panel Disposers” provides that, with respect to the measures to be taken by “Business-use PV Panel Disposers”,<sup>4</sup> the following matters are to be set forth by an ordinance of ministry as matters to serve as standards for judgment:

- a) matters concerning measures for the long-term use as well as reuse of Business-use PV Panels and for reducing the amount of Business-use PV Panels that become Business-use PV Panel (Article 7, Paragraph 1, Item 1);
- b) the disposal method of generated Business-use PV Panel (Item 2 of the same Paragraph);
- c) matters concerning the generation of Business-use PV Panel (Item 3 of the same Paragraph);
- d) matters concerning ensuring the appropriate implementation of the disposal of generated Business-use PV Panel (Item 4 of the same Paragraph);
- e) regarding large-quantity Business-use PV Panel Disposers, matters that should be given particular consideration when filing the notification under the provisions of Article 9, Paragraph 1 or Paragraph 2 (Item 5 of the same Paragraph); and
- f) other matters necessary for reducing the disposal of Business-use PV Panels and implementing the recycling of Business-use PV Panel (Item 6 of the same Paragraph).

### 2.3. Obligations of “large-quantity business-use PV Panel disposers”

Next, at the 10th meeting of the Working Group, a framework was presented under which, among the above-mentioned “those who intend to dispose of used PV Panels, etc., that had been used in revenue business,” only “those who intend to dispose of **large quantities** of used PV Panels, etc.,” would be subject to the obligation to file a notification on the implementation plan for disposal, as well as to recommendations and orders in relation to such filing. In addition to this point, the current Bill sets forth provisions in line with the framework.

Under the current Bill, a defined “large-quantity business-use PV Panel disposer”<sup>5</sup> must, if intending to dispose of such Business-use PV Panels, file a notification to the competent minister of the implementation plan for the disposal of the Business-use PV Panels (the “**Implementation Plan**”) (Article 9, Paragraph 1 of the Bill).

Furthermore, a person who has filed a notification may not, until, in principle, 30 days have passed from the date on which the notification was received, either generate Business-use PV Panel on their own in connection with the disposal of the Business-use PV Panels described in the

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<sup>4</sup> A “Business-use PV Panel Disposer” means a person who disposes of, or intends to dispose of, Business-use PV Panels (Article 2, Paragraph 4 of the Bill), where “Business-use PV Panels” means PV Panels that are used, or had been used, in revenue business (Paragraph 1 of the same Article).

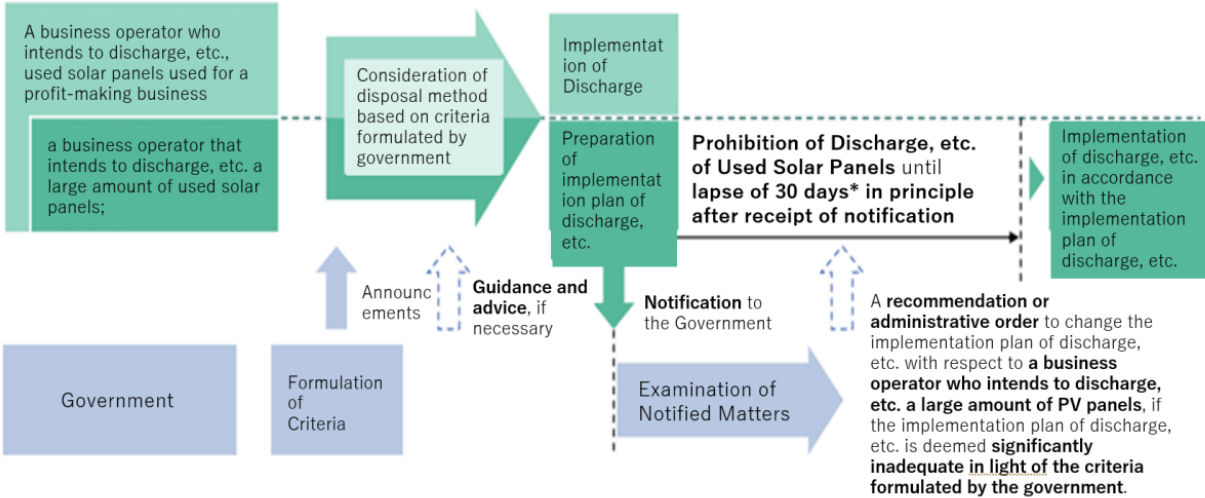
<sup>5</sup> A “large-quantity business-use PV Panel disposer” means a “Business-use PV Panel disposer” that has the quantity of Business-use PV Panels intended for disposal that meets the requirements specified by the Cabinet Order (Article 9, Paragraph 1 of the Bill).

Implementation Plan that was filed, or cause another person to generate such Business-use PV Panel by having such person carry out construction or work (Paragraphs 3 and 4 of the same Article).

If the Minister finds that the content of the Implementation Plan that has been filed is significantly insufficient in light of the matters that should serve as standards for judgment, the minister may, within 30 days, in principle, from the date on which the notification was received, issue a recommendation and order requiring the person who filed the plan to amend it or take other necessary measures (Paragraph 5 of the same Article).

The obligations under the Bill applicable to the above-mentioned “large-quantity business-use PV Panel disposers” are also clearly illustrated by the figure below from the official materials for the Working Group’s 10th meeting.

【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.

### 3. Conclusion

As stated above, during year 2025, the concept of a PV Panel recycling system once abandoned has been revived and is now moving forward in concrete form as a bill. Since the Bill is expected to be enacted in the current Diet session, it is necessary to keep paying attention to how the matter unfolds.

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