



Rt Hon Ed Miliband MP  
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**BY EMAIL**

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Dear Secretary of State,

**The solar energy supply chain: a request to ensure solar Nationally Significant Infrastructure Projects (NSIPs) have no links to modern slavery**

As you are aware, following the granting of consent, and subject to judicial review, the 2,000 plus acre Sunnica Solar Farm will be partially located in the west of our county. Over and above this, thousands of acres of solar NSIPs have connection offers in Suffolk listed on the Transmission Entry Capacity register.

Reasonable estimates suggest the People's Republic of China is responsible for the production of upwards of 80 percent of the world's solar panels, and that 45 percent of the world's supply of polysilicon<sup>1</sup>, an essential component for solar panels, is produced using Uyghur forced labour camps in Xinjiang<sup>2</sup>.

The people of Suffolk, and indeed our country, should have confidence that the panels used for these developments are not made using forced labour, and, that if they must live with thousands of acres of panels on good farmland, that this "cheap electricity", is not something for which others have paid a price, that is far too high.

Suffolk County Council considers that environmental and social governance of the solar supply chain is now more critical than ever; given the ongoing rollout of thousands of acres of solar panels across our county, the host of emerging proposals enabled by new transmission infrastructure, such as the Bramford to

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<sup>1</sup> <https://www.unison.org.uk/content/uploads/2022/08/Clean-dirty-energy-1.pdf>

<sup>2</sup> <https://www.theguardian.com/environment/2021/apr/23/revealed-uk-solar-projects-using-panels-from-firms-linked-to-xinjiang-forced-labour>

Twinstead and Norwich to Tilbury pylon schemes, and the government's stated drive for a "rooftop revolution".

The resolution of this issue must surely be accelerated and expedited by government and the solar energy sector. Not doing so leaves the government's 2030 ambition to decarbonise the grid without the support of a robust ethical foundation, and unable to ensure that it delivers a just transition. You have recognised that the revitalised solar taskforce is well placed to prioritise this issue<sup>3</sup>, but the ambition to act must become action.

Whilst it may be superficially attractive when considering the pressing need to secure energy independence and decarbonisation, to ignore the needs of those adversely impacted by this policy, this approach could not be considered ethical, fair, or just. The UK needs to decarbonise and adapt to a changing climate, but it cannot do so by ignoring the inconvenient truths that need to be addressed to ensure a just transition, be that overseas, or in the UK.

The County Council currently runs a scheme to facilitate the group purchase of solar panels and installation of these to enable more people who live in Suffolk to take effective and affordable steps to decarbonize their energy use. The Solar Together Suffolk<sup>4</sup> scheme has been running for several years and has a high level of public support. However, the Council has not been able to secure effective supply chain guarantees in relation to the provenance of the materials used, despite asking for such assurance, and this raises significant ethical questions, and has the potential to put the Council in breach of its own policies, in relation to modern slavery<sup>5</sup>.

I recognise that some very tentative attempts to resolve these matters have been taken by the industry. The publication some time ago of the solar stewardship initiative ESG standard<sup>6</sup> and just last month the publication of a draft supply chain traceability standard<sup>7</sup>, that may, eventually, operationalise genuinely effective environmental and social governance of solar supply chains, are welcome steps. However, the pace is unacceptably slow and appears not to be driven with any determination.

It is extremely unfortunate that progress on these issues has not been more rapid. Therefore, this Council, and the many other local authorities that have similar solar energy initiatives, are not able to provide sufficient reassurance to those participating in their group purchase schemes, that the materials and manufacturing of photovoltaic panels is not supported by unacceptable labour practices, including forced labour.

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<sup>3</sup> <https://www.gov.uk/government/news/solar-taskforce-meets-in-drive-for-clean-power>

<sup>4</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/initiatives/solar-together-suffolk>

<sup>5</sup> <https://www.suffolk.gov.uk/asset-library/modern-slavery-statement-2023.pdf>

<sup>6</sup> <https://www.solarstewardshipinitiative.org/app/uploads/2023/11/SSI-ESG-Standard.pdf>

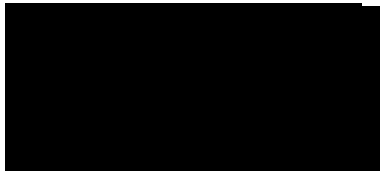
<sup>7</sup> <https://www.solarstewardshipinitiative.org/app/uploads/2024/08/SSI-Supply-Chain-Traceability-Standard-Public-Consultation-Draft-Version.pdf>

Unless this is resolved, a key plank of the energy transition will be founded upon a profound injustice that there has, to date, been no robust and systematic attempt to address. As the Helena Kennedy Centre for International Justice has said this year.

*“Without definitive action from investors and policymakers, the clean energy transition is at risk of becoming inextricably linked to the persecution<sup>8</sup>”*

I would be grateful if you could give your personal guarantee that if Suffolk is to host nationally significant solar farms on behalf of the UK, that neither these, or the Sunnica Solar Farm which has been granted consent, will have links to forced labour in China, or indeed elsewhere. I am sure you will agree that the absence of any such guarantee could further undermine public confidence in our energy transition and leave His Majesty’s Government open to the accusation of being complicit in the abuse of persecuted peoples elsewhere in the world.

Yours sincerely,



Richard Rout

Deputy Cabinet Member Nationally  
Significant Infrastructure Projects

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<sup>8</sup> <https://www.renewableenergymagazine.com/panorama/new-research-warns-that-governments-and-investors-20240123>