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Product Eligibility

Q: Are solar panels used on commercial, utility, or micro-generation sites all part of the program?

A: Yes. Solar panels used in all these types of sites are subject to environmental fees, provided that they meet the product definitions (see table below).

Category	Products Included	Additional Information
CRYSTALLINE SILICON (c-SI) SOLAR PANELS **Fee: $14.00**	• Monocrystalline Silicon • Polycrystalline Silicon • Perovskite-Silicon tandem	Residential, commercial, industrial, and utility use.
THIN-FILM SOLAR PANELS **Fee: $14.00**	• Cadmium Telluride (CdTe) • Copper Indium Gallium Selenide (CIGS) • Amorphous Silicon (a-Si) • Gallium Arsenide (GaAs)	**Minimum size: 1m²**

Q: What is excluded from the program?

A: Products that are excluded from the program (not subject to the solar panel environmental fees) include:

- Solar thermal panels
- Inverters
- Racking or mounting structures
- Battery energy storage systems (BESS)
- Cables & wires
- Solar-powered electronic devices (e.g. garden gnomes, calculators, cameras, watches, power bank/charges, etc.)
- Solar-powered appliances (e.g. radio, water pump, fan, cooler, heater)

Q: Why was $1m^2$ chosen as the minimum size? Are there concerns that this will impact the supply chain and that developers/users will opt for smaller panels to avoid the fee?

A: The minimum size was established based on research, conversations, and discussions with the Government of Alberta. Selecting $1m^2$ would reflect the majority of the panel sizes currently in use. ARMA has not specified a maximum size in the product definition.

ARMA plans to review the program regularly to ensure it captures the right "sizes" in the program, consistent with the approach in our other stewardship programs. The product definitions and sizes are not static; as conditions change, they can be adjusted as needed to reflect new realities and ensure a level playing field for all suppliers.

ARMA has consistently reviewed our product categories to ensure a level playing field for all suppliers.

Environmental Fees (Eco-Fees)

Q: What is the environmental fee for solar panels?

A: The draft environmental fee is $14.00 per panel based on the established product definitions.

Q: Does the wattage or weight of the panel impact the fee?

A: No. The fee is a per-panel fee regardless of the wattage or other characteristics of the panel.

Q: How does Alberta's environmental fee compare to other jurisdictions?

A: As this is the first stewardship program for solar panel recycling in North America, there are no other environmental fees in place currently for comparison.

Q: Will fees have to be paid for all solar panels currently in use in Alberta?

A: No. The fees will not be applied retroactively; they will only be applicable for solar panels that are purchased on or after October 1, 2026.

Q: How was the environmental fee established?

A: We have established a blended fee, meaning that panels currently in operation as well as future projected new panels were taken into consideration to determine an appropriate fee that will reflect the end-of-life management of both.

The draft environmental fee was developed using a model that addresses key aspects of the recycling program in order to calculate an appropriate fee. The model inputs include:

- Volume – estimation of both installed and decommissioned panels through 2060, as well as forecasts to project timing when end-of-life will be required.

- Costs – considerations including operational costs, capital expenditures, and recycling revenues.
- Program Reserve – ensure that funds are available when panels reach end-of-life.

The calculated fee is tested to see the impact of adjustments to key assumptions to ensure the model is responsive to change.

ARMA commits to ongoing assessment of environmental fees (consistent with the approach in our other stewardship programs). The fee is not static; as conditions change, the fee can be adjusted, if needed, to reflect new realities.

Registration and Environmental Fee Remittance

Q: Who is responsible for registering with ARMA?

A: Anyone who supplies or installs solar panels in or into Alberta is required to register with ARMA. A Supplier is a manufacturer, marketer, wholesaler, distributor, retailer, marketplace seller, marketplace owner, or any other supplier of eligible material in/into Alberta. Supplier and other relevant definitions can be found in the *Electronics (Renewables) Recycling Bylaw*.

Q: What to do if you're still unsure if you need to register?

A: If you're still unsure if you need to register under the regulation, the default would be to submit an application to register and reach out to our team to discuss your particular situation.

Q: What does "sale" mean?

A: A transaction where product ownership is transferred.

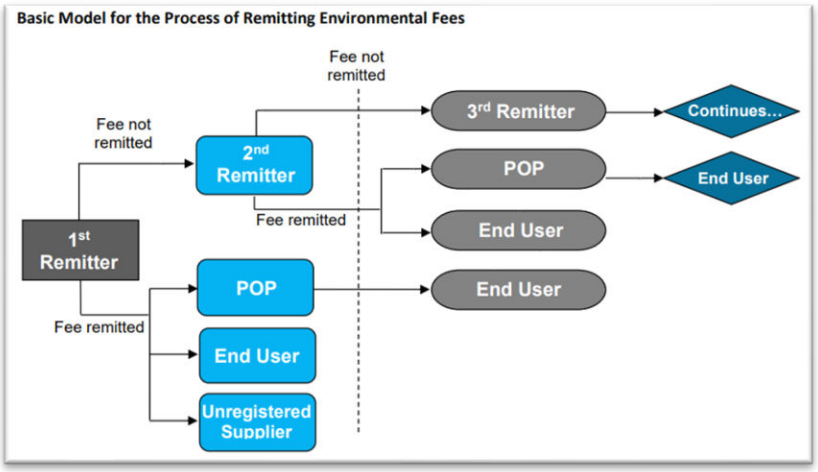
Q: When should I register with ARMA?

A: ARMA will be sending a formal notification regarding the program launch. The target date for the notifications is June 1st, and Suppliers will be able to complete their registration with ARMA any time after that date. Registrations should be submitted to ARMA before the program launches on October 1, 2026.

Q: Who is required to pay the environmental fee to ARMA? How does ARMA avoid collecting the fee twice?

A: The entity that will be responsible for remitting the fee will be determined by ARMA during the registration process. ARMA has different classifications of registered Suppliers with associated reporting obligations:

- ***Remitter Suppliers*** levy, report, and remit fees directly to ARMA based on the sale or supply of eligible solar panels in/into Alberta. To prevent the fees from being remitted more than once, remitters are exempt from being charged the fee by their suppliers who already hold a remitter status with the Program.
- ***Payment on Purchase (POP) Suppliers*** pay the fee to all their suppliers, who are registered with the Program, when purchasing inventory and therefore are not required to report and remit fees directly to ARMA, as this will be done by their suppliers on their behalf. POPs then recoup the fee from their customers when they resell.



ARMA's registration process is designed to ensure a level playing field for all Suppliers so that the fee is remitted at the correct point in the supply chain and to avoid the risk of double remitting fees.

Q: How often does the environmental fee need to be reported?

A: Reporting and remitting of environmental fees will be on a monthly schedule. The first remittances will be for the October 2026 reporting period and will be due to ARMA no later than November 30, 2026.

Q: How does the environmental fee apply if solar panels are moving into Alberta from other provinces and the manufacturer does not know where the product will end up?

A: Environmental fees are collected and reported based on the delivery address. Any eligible material supplied into Alberta from outside the province would be obligated to have the fee applied.

Q: What if the solar panel is damaged in shipment or not usable upon supply? Will the environmental fee be paid twice on this product?

A: No. If the damaged panel is to be disposed of in Alberta, a fee applies and should be reported to ARMA as a 'disposal' prior to being disposed of. If the fee was already paid to your supplier when the panel was originally purchased, you would not be required to report the fee, as it would already have been paid and reported to ARMA by your supplier.

If the damaged panel is returned to a location outside of Alberta, no fee applies; however, proof of shipment to a location outside of Alberta will be required.

Q: What are the consequences if the fee is missed?

A: ARMA has implemented a strong financial compliance system that allows us to audit suppliers for eco-fee remittance. Our focus is on educating suppliers about their obligations under the regulations, and we strive to raise their awareness of these responsibilities as often as we can. We have a dedicated team that specializes in engaging, supporting, and communicating with both current and potential suppliers.

While we do take regulatory compliance actions against suppliers who fail to meet Regulations and the resulting Bylaws, our primary approach is always centered on education. We believe that fostering understanding is key to ensuring compliance.

Q: How do you ensure fees are being reported correctly?

A: ARMA has established a solid revenue compliance process to ensure that fees are paid correctly. Each year, we select suppliers for review based on a risk assessment and work closely with them to examine their reporting and remittances, helping to identify and resolve any issues that may arise. Our approach focuses on education, as we strive for suppliers to remit accurately without over- or under-reporting.

Recycling Program Operations

Q: When will solar panels start being accepted for recycling?

A: Solar panels will be accepted for recycling when the program launches on October 1, 2026.

Q: Is there a list of preferred recyclers for solar panels?

A: ARMA will be engaging the services of a handler/recycler for end-of-life solar panels. Once the service provider is confirmed, the information will be available on the ARMA website.

Q: Can the solar panels be recycled outside of Alberta?

A: The objective is to build a made-in-Alberta solution for solar panel recycling. In the initial phase of the program, there may be some downstream processing that occurs outside of the province while in-province recycling capabilities are established.

Q: Can I use my current disposal service for solar panels?

A: ARMA will have a solar panel handler/recycler approved in the program, and the eco-fees will be used to support the collection and management of the panels at end-of-life. If generators choose to work with an alternative third party not registered with ARMA, it would be outside the scope of ARMA's program and service fees may apply.

Q: Will there be tracking and reporting requirements for panel recycling?

A: Suppliers are not required to track the recycling of solar panels. Suppliers will only need to report/remit on eco-fees associated with the supply of solar panels and will not have reporting requirements related to recycling. ARMA will be establishing a system to have collection sites and handlers/recyclers report and track incoming and outgoing panels.

Q: What happens to materials when a solar panel is recycled?

A: Once the recycler breaks down the panels into various commodities (i.e., glass, metal, silicon), those materials can be shipped 'downstream' for further processing or used in remanufacturing processes.

Q: Is a power producer required to register?

A: Power producers are required to register so that ARMA can identify all the suppliers and installers that work with power providers in Alberta, and to have this information updated periodically, to ensure all businesses in the supply chain are registered. The intent is to register power producers with a status that would not require them to remit directly to ARMA. However, in rare cases where an end user (power provider) purchases from someone who is not registered with the Program, or an end user (power provider) imports solar panels into Alberta for the end user's (power provider) own use, this may result in the end user (power provider) being obligated to report the fees directly to ARMA.

Q: Once registered, how does a Supplier update their list of suppliers and customers or verify the status of another business in the supply chain?

A: The registration application will include providing a full list of the applicant's solar panel suppliers and any customers that purchase solar panels from them for the purpose of resale.

It is a Supplier's responsibility to keep this information up to date, and registered Suppliers can manage their supplier and customer lists and verify the status of other businesses in the supply chain through ARMA's online portal, "ARMA Connect".

Reuse / Refurbishment Pilot

Q: How will reuse/refurbishment be enabled within the program?

A: In the initial stages of the program, ARMA will be working with designated collection sites and the solar panel handler to have the panels visually inspected and sorted based on potential reuse/refurbishment.

A working group consisting of industry experts, regulators, recyclers, and other key stakeholders will be established to support the development of standards and certifications that would be essential for a viable reuse and refurbishment market.

Q: Will there be a different environmental fee for panels that can be reused vs. the ones that are recycled only?

A: The potential reusability of a panel will not be determined until it enters the recycling program and is assessed. The opportunity for reuse will not impact the environmental fee that is charged on the panel. The environmental fee is remitted at the time of sale, but there will not be an applicable fee to a panel that is re-sold (after being diverted for reuse).

Q: Also, will there be any incentives if panels meet the criteria for reuse vs. recycling?

A: The program funding structure for collection and handling (including visual inspection and sorting for potential reuse) is currently in development. Any funding and/or incentives available related to the reuse pathway will be shared once available.