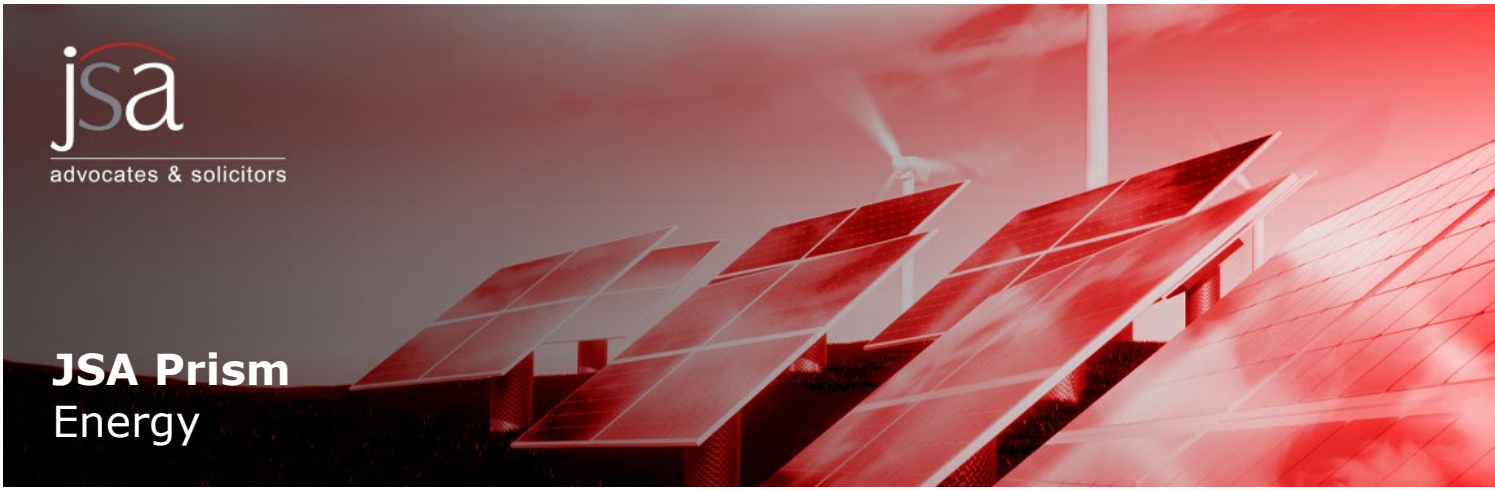

April 2026

Ministry of New and Renewable Energy proposes extension of Approved Models and Manufacturers framework to solar wafer manufacturing

The Ministry of New and Renewable Energy ("**MNRE**"), *vide* office memorandum dated March 17, 2026 ("**Memorandum**"), has proposed amendments to the Approved Models and Manufacturers of Solar Photovoltaic ("**PV**") Modules (Requirements for Compulsory Registration) Order, 2019 ("**ALMM Order**"), *inter alia*, to introduce a new Approved List of Models and Manufacturers ("**ALMM**") List-III for PV wafers. The proposed framework seeks to extend the applicability of the ALMM regime across the solar manufacturing value chain by mandating the use of ALMM-enlisted wafers, in addition to modules and cells, for projects falling within the scope of the ALMM Order.

The proposed ALMM List-III is intended to be made effective from June 1, 2028 ("**Effective Date**"), subject to fulfilment of specified conditions. The proposed amendments also introduce a structured transition framework, including exemptions linked to bid timelines and differentiated applicability based on project categories and commissioning timelines.

Salient features

1. **Introduction of ALMM List-III and market readiness threshold**: MNRE has proposed the creation of ALMM List-III for solar PV wafers, to be made effective from the Effective Date. The issuance of ALMM List-III is subject to fulfilment of a threshold requiring at least 3 (three) independently operating wafer manufacturing units, not under common ownership or control, with a minimum aggregate manufacturing capacity of 15 (fifteen) gigawatts per annum.
2. **Integrated manufacturing requirement for enlistment:** For inclusion in ALMM List-III, wafer manufacturers are required to have ingot manufacturing capacity equivalent to the wafer manufacturing capacity proposed for enlistment. Accordingly, the enlisted capacity will reflect both ingot and wafer manufacturing capabilities.
3. **End-to-end ALMM compliance across the value chain**: Projects covered under the ALMM framework will be required to ensure value chain compliance, whereby: (a) solar PV modules must be sourced from ALMM List-I; (b) such modules must use solar PV cells from ALMM List-II; and (c) such cells must use wafers from ALMM List-III. From the Effective Date, eligibility of modules under ALMM List-I will be contingent upon compliance with such cell and wafer sourcing requirements.
4. **Exemptions based on bid timelines**: Projects where the last date of bid submission falls on or before 7 (seven) days from the issuance of the initial ALMM List-III ("**Cut-Off Date**") will continue to be required to use ALMM-listed modules and cells but will be exempt from the requirement of using ALMM-listed wafers, irrespective of their commissioning date. Such exemption also extends to projects where bids or power purchase agreements were executed prior to the Cut-Off Date.

5. **Mandatory compliance for post cut-off projects**: Projects where the last date of bid submission falls after the Cut-Off Date will be required to incorporate conditions mandating the use of ALMM-listed modules, cells and wafers from List-I, List-II and List-III, respectively.
6. **Transition framework and sub-categorisation:** The proposed amendments provide for the creation of parallel ALMM sub-lists, including ALMM List-I(a), ALMM List-I(b) and ALMM List-II(a), to address projects that are exempt from wafer-level compliance but remain subject to module or cell-level requirements. The Memorandum further provides for differentiated applicability based on project category and commissioning timelines, including exemptions for net-metering and open access projects commissioned prior to the Effective Date, and phased compliance requirements for government-owned captive projects.
7. **Additional clarifications:** Thin-film solar PV modules manufactured in integrated facilities and enlisted under ALMM List-I are deemed to be compliant with the requirements relating to use of ALMM-listed cells and wafers. The Memorandum further clarifies that there will be no relaxation in domestic content requirement provisions under existing MNRE schemes. Detailed procedural guidelines for enlistment under ALMM List-III are proposed to be issued separately.

Conclusion

The proposed introduction of ALMM List-III extends the ALMM framework to the upstream wafer segment and introduces a value chain-based compliance structure. Wafers constitute a critical intermediate stage between polysilicon and solar cells, and the proposed framework seeks to address India's continued reliance on imports in this segment by promoting domestic manufacturing capacity.

The implementation of wafer-level compliance is expected to facilitate investments in ingot and wafer manufacturing, strengthen supply chain resilience and enhance traceability across the solar value chain. The transition framework, including exemptions linked to bid timelines and project categories, is likely to have implications for procurement structuring and supply arrangements for solar projects. The effectiveness of the proposed amendments will, *inter alia*, depend on the development of sufficient domestic manufacturing capacity and the timely issuance of procedural guidelines. The proposed framework may also have broader implications for project developers, manufacturers and investors, particularly in relation to sourcing strategies, compliance requirements and supply chain alignment.

Clean Energy & Climate Change Practice

Our team's climate change and sustainability practise is regarded as a leading specialized practice acknowledged for its domain knowledge, multi-dimensional expertise and strengths in grappling with complex issues involving public policy, economics, technology, finance, project management besides law. The practice is handled by domain expertise-based team which has advised various stakeholders in renewable energy, electric mobility, energy efficiency, carbon markets, ESG and new and emerging low carbon technologies, including green hydrogen. The team is highly ranked by various legal ranking agencies and is credited for contributing to several landmark and precedent setting projects. This practice encompasses:

- Legislative, Regulatory and Policy reforms;
- Public Procurement;
- Compliance and Strategy;
- Transactional advice including mergers and acquisitions, project finance, structuring legal, regulatory and contractual frameworks.
- ESG compliance, Carbon Markets and nature-based projects

This Prism has been prepared by:

Vishnu Sudarsan
Partner

Sugandha Somani Gopal
Partner

Priyanka Barik
Senior Associate

Vihaan Pathak
Associate

19 Practices and
40 Ranked Lawyers

8 Ranked Practices,
22 Ranked Lawyers

15 Practices and
20 Ranked Lawyers

13 Practices and
49 Ranked Lawyers

20 Practices and
24 Ranked Lawyers

8 Practices and
10 Ranked Lawyers
Highly Recommended in 5 Cities

Regional Legal Expertise Awards (APAC) of the Year
Energy Firm Competition/
Antitrust Firm

Among Best Overall
Law Firms in India and
14 Ranked Practices
---
9 winning Deals in
IBLJ Deals of the Year
---
15 A List Lawyers in
IBLJ A-List – 2026

Recognised in World's 100 best
competition practices of 2026

Ranked Among Top 5 Law Firms in
India for ESG Practice

Asia M&A Ranking
2025 – Tier 1

For more details, please contact km@jsalaw.com

Ahmedabad | Bengaluru | Chennai | Gurugram | Hyderabad | Mumbai | New Delhi