Dear Sir or Madam,

For the following photovoltaic modules of the stated types (Modules):

Q.PEAK DUO-GY XXX;  Q.PEAK DUO-GY.Y XXX;  Q.PEAK DUO-GY+ XXX;
Q.PEAK DUO BLK-GY XXX; Q.PEAK DUO BLK-GY+ XXX; Q.PEAK DUO L-GY XXX;
Q.PEAK DUO L-GY.Y XXX;  Q.PEAK DUO L-GY.Y+ XXX;  Q.PEAK DUO ML-GY XXX;
Q.PEAK DUO ML-GY+ XXX;  Q.PEAK DUO BLK ML-GY XXX;  Q.PEAK DUO BLK ML-GY+ XXX;
Q.PEAK DUO XL-GY XXX;  Q.PEAK DUO XL-GY.Y XXX;
Q.TRON-GY+ XXX;  Q.TRON BLK-GY+ XXX

(Y is the version and can be any number between 1 and 11, XXX is the power and can be any value between 330-590 Wp) we hereby declare the following:

The Hanwha Q CELLS Group imports the aforementioned modules into the customs territory of the European Union (EU) and places them on the market. In accordance with the definition in Article 3 Paragraph 3 of the Regulation (EC) No. 1907/2006 (REACH), the modules correspond to the definition as “article” within the meaning of REACH, where the specific design of the object determines its function to a greater degree than does its chemical composition. Articles are not subject to compulsory registration under REACH.

However, materials within articles are subject to compulsory registration under REACH if they are intended to be released under normal or reasonably foreseeable conditions of use (Article 7, Paragraph 1). This is not the case for the modules mentioned above.

A further obligation to provide information is stipulated under REACH for Substances of Very High Concern (see SVHC Candidate List) that occur in an article in a concentration of more than 0.1% weight by weight (w/w) mass percent (Article 33, Paragraph 1 and 2). The above modules contain parts which contain lead (Pb) in concentrations above 0.1% but below 1%. However, the total lead content in the whole module is below 0.1%. The lead containing parts are hazardous, but are included safely within the module as long as it is undamaged. During intended use with undamaged modules there is no danger. With damaged modules contact with the contained lead might be possible. We suggest to handle damaged modules with gloves and particle filters (see also our safety instructions).

In case of further questions please do not hesitate to contact us.

Kind regards,

Moon Hwan Cha
Executive Vice President Hanwha Q CELLS GmbH