



REACH Declaration (August 8, 2017)

The Rayovac North America division of Spectrum Brands, Inc. (“Rayovac”) has received requests concerning the European REACH Directive 1907/2006. Below is Rayovac’s position regarding REACH.

The Rayovac North America division of Spectrum Brands, Inc. does not have any obligations under REACH and is not subject to the jurisdiction of REACH. REACH only applies to companies that manufacture batteries in Europe or import batteries into Europe. The Rayovac North America division of Spectrum Brands, Inc. does not manufacture batteries in Europe or import batteries into Europe. All batteries sold by the Rayovac North America division originate in the United States (i.e. all batteries were either manufactured in the United States or were imported into the United States). Therefore, REACH does not apply to the Rayovac North America division of Spectrum, Brands, Inc.

To assist Rayovac customers who must comply with REACH, Rayovac has conducted an analysis on the Rayovac batteries listed below.

Alkaline batteries
Heavy Duty batteries
Zinc-Air batteries
Lithium batteries
Rechargeable batteries and battery packs
Specialty batteries for watches, electronic, fencing

To date, the batteries listed above **DO NOT** contain any of the 174 substances on the Candidate List of Substances of Very High Concern (SVHC). The batteries listed below contain one or more of the 174 SVHC’s on the Candidate List. More information can be found on the corresponding safety data sheet (SDS).

Battery	SVHC	Concentration	Annual Metric Tons
CR, BR & FB Lithium Carbon-Monofluoride cells (CR2032, BR2032, BR2335, BR1225, BR1632, FB2032H2, and FB1225H2)	1,2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME) (CAS # 110-71-4)	> 0.1%	< 1,000kg

Furthermore, **NONE** of the above Rayovac batteries or the substances therein, need to be registered under REACH Article 7(1). Article 7(1) requires registration of any substance(s) contained within an “article”¹ if the “article” is intended to release the substance(s) under normal and reasonably foreseeable conditions of use. However, under normal and reasonably foreseeable conditions of use, the above

¹ The ECHA has explicitly stated that batteries are “articles” under REACH Article 3(3). See European Chemicals Agency, *Guidance on Requirements for Substances in Articles*, appx. 1, table 2 (2011), available at http://echa.europa.eu/documents/10162/13632/articles_en.pdf. More specifically, batteries are articles with integral substance/mixtures.

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Rayovac batteries are not intended to release any substances. Therefore, the requirement in REACH Article 7(1) for registration of substances does not apply.

It should be noted that the information contained herein is not legal advice and should not be relied on as such. This letter merely provides information about the contents and properties of Rayovac batteries. Rayovac encourages companies that import Rayovac batteries into Europe to seek their own legal advice with respect to compliance with REACH.

If any of the above information changes your company will be promptly notified and will be provided an updated REACH Declaration document.