

November 2008

RE: Newell Rubbermaid Group – REACH Compliance Program

Dear Customer,

I am following up with you about Newell Rubbermaid's current status regarding REACH.

REACH stands for **R**egistration, **E**valuation and **A**uthorization of **C**hemicals.

This letter is part of our policy of keeping our customers informed about our REACH introduction plans.

As you probably know the period for pre-registration of chemical substances under REACH is ending on 30 November 2008.

With this letter I would like to inform you that Newell Rubbermaid has already pre-registered 339 PHASE-IN substances that we are either manufacturing or importing into Europe (*whether on its own, as preparation or included in articles with a view to be released under normal circumstances*) and that are not being pre-registered by our own suppliers.

In order to do so we have appointed B-Lands Consulting who is registered with the European Chemical Agency as the Only Representative (OR) for Newell Rubbermaid Inc. A copy of the OR appointment is attached for your information.

As mentioned above we have so far registered 339 PHASE-IN substances which are falling under REACH. Only 100 of those substances are being used by us in volumes exceeding 1 tonne/year, which is the minimum volume for (pre-)registration. Although 239 substances are not used in volumes above 1 tonne/year we have nevertheless decided to pre-register all of the substances as to benefit from the grace period for registration offered by the REACH regulation which under certain circumstances is up till 2018.

Note that in most cases we are merely downstream users and as such will have most probably no obligation under REACH to register the substances even though we have pre-registered.

We have now started the process of contacting the suppliers of the substances to make sure they confirm they will register the substance and include in their registration dossier the use we are making of the substance contained in the products you are buying from us.

Please also note that this letter covers all of the existing Groups and Global Business Units (GBUs) that are part of the Newell Rubbermaid Group.



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We trust you find this information valuable and should you have any questions or concerns on our products please do not hesitate to get in touch with me.

I will be contacting you again as we progress through the implementation of our REACH compliance program.

Yours faithfully

Ken Anderson
Product & Technical Manager



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