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To Whom It May Concern:

On January 1, 2009, ICAO (International Civil Aviation Organization) and IATA (International Air Transport Association) put new lithium battery air transport regulations into effect. Spectrum Brands manufactures and distributes Lithium Metal batteries under the Rayovac brand name. A shipment of Rayovac Lithium Metal batteries, not packed in or with equipment, via air freight is compliant with the lithium battery air transport regulations by packing instruction 968. The following summarizes features of Rayovac Lithium Metal batteries:

- Rayovac Lithium Metal batteries have less than 2g of aggregate lithium content
- Rayovac Lithium Metal batteries have been tested and meet the requirements of the UN Manual of Tests and Criteria, Part III, subsection 38.3; test results are on file and can be reviewed upon special request
- Rayovac Lithium Metal consumer and bulk packaged batteries are packaged in master cartons weighing less than 2.5 kg G
 - Each master carton passes a 1.2m drop test as outlined in the packing instruction
 - Each master carton is labeled with the lithium battery handling label
- Rayovac Lithium Metal batteries are packed in inner packs that completely enclose the batteries and protect against short circuits
- Rayovac Lithium Metal battery inner packs are packed in strong outer master cartons

As a reminder, any air shipments of primary (non-rechargeable) lithium batteries to/from or transiting the US are prohibited on passenger aircraft per the USDOT. A label noting the prohibition is required on every master carton, including ocean and truck shipments. Any person preparing or offering batteries for transport must be properly trained on these requirements. Finally, Rayovac Lithium Metal batteries packed with equipment are covered by packing instruction 969 and Rayovac Lithium Metal contained in equipment is covered by packing instruction 970. Some of these requirements are different than those stated in packing instruction 968.

Please see the Technical/OEM Section on www.rayovacindustrial.com for more information.

Sincerely,

Mike Padesky
Compliance Manager
Spectrum Brands, Inc.

Mike Lambe
OEM/Technical Sales
Rayovac Division