



Berkshire Corporate Park, Bethel, CT 06801 USA

Declaration of Compliance with EU Regulations

To Whom It May Concern:

We, Duracell Company, hereby declare that the product(s) supplied to you, fully comply with the following European Union regulations:

1. **EC REACH Regulation (EC 1907/2006):** Duracell® batteries are articles under the EC REACH Regulation (EC 1907/2006) and are not subject to the REACH registration and SDS requirements. All Duracell batteries have been manufactured and supplied in accordance with the requirements specified in the EC REACH Regulation (EC 1907/2006).

In our commitment to compliance, Duracell has incorporated a REACH clause into all raw material specifications for purchased substances and products. This clause is designed to guarantee that every substance and product destined for the EEA market meets the stringent standards set forth by REACH, thereby reinforcing our dedication to regulatory excellence and product quality.

- **REACH Article 67 Substance Restrictions (Annex XVII):** Duracell batteries adhere to the substance restrictions outlined in Annex XVII of the REACH Regulation.
- **SVHC (Substances of Very High Concern):** Duracell battery systems (i.e., **alkaline, nickel metal hydride, silver oxide, zinc air**) are assessed and do not contain any substances listed on the Candidate List of SVHC for Authorization, as of the latest available information.

There is no regulatory obligation under EU REACH to confirm when products do NOT contain any SVHC's at >0.1% (w/w).

Duracell® lithium battery products are known to contain a listed SVHC at a concentration greater than >0.1% w/w:

Lithium Coin Designations	1220,1616, 1620, 1632, 2016, 2025, 2032, 2430, 2450, 2477
High Performance Lithium Designations	CRV3, 1/3N, 28L, 123, 223, 245, CR2, 2/3A
SVHC Substance Name	1, 2-Dimethoxyethane (EGDME)
EINEC Number/ CAS Number	203-794-9 /110-71-4
Concentration	The battery contains EGDME-SVHC in a concentration ranging from 1.0 to 10.0% by weight. Because the battery is sealed, 100% of the EGDME-SVHC is confined in the battery

The Candidate List of SVHCs is updated approximately biannually and DURACELL will update stakeholders accordingly if the SVHC list updates or any other relevant chemical restriction updates affect the assessment herein. The SCIP database has been updated accordingly for relevant Duracell batteries and Duracell is in compliance with the SCIP requirement.

2. **EU POP Regulation (Regulation (EU) 2019/1021) and Amendments:** Duracell batteries are assessed to be compliant to the EU POP Regulation (Regulation (EU) 2019/1021) and any relevant amendments restricting the production and use of persistent organic pollutants.
3. **EU RoHS2 Directive 2011/65/EU and its amendment (EU) 2015/863:** Batteries are not regulated under the EU RoHS2 Directive 2011/65/EU and its amendment (EU)2015/863. Under the EU Battery Directive, the limits for mercury, cadmium and lead are more restrictive than the RoHS limits.
4. **EU Battery Directive 2006/66 and Amendment 2013/56 EU:** All Duracell batteries comply with the marking requirements and substance restriction limits set forth in the EU Battery Directive 2006/66 and Amendment 2013/56 EU.
The battery directive will be repealed with effect on 18 August 2025 by EU New Battery Regulation 2023/1542. Article 95 lists provision for this repeal, which includes information on articles that will keep applying for a longer time.
Battery Regulation 2023/1542 will begin applying from 18 February 2024 onwards. (all relevant provisions could be found under Article 96)
5. **EU 2023/1115: European Union Deforestation Regulation (EUDR):** Duracell batteries are manufactured in adherence to sustainable practices and assessed to meet standards set forth by EU2023/1115 regulation.

This declaration is based on the information available to us at the time of issuance and is subject to updates or amendments in the event of changes in product composition or relevant regulations.

For further inquiries regarding product compliance or additional documentation, please do not hesitate to contact us.

Sincerely,

NAME: Milena Radisavljevic
POSITION: Regulatory Affairs Manager E&A

DATE: 08th May 2024