



CERTIFICATE OF COMPLIANCE

Subject: The EC Regulation 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH Regulation).

Swedish Match Lighters BV, your supplier for Cricket, Poppell, Swan and FirePower Lighters declares by this statement to have the intention of Full compliance to the REACH Regulation. A Lighter is an Article/ container, containing chemicals (gasses) which can be released from it.

Within the context of REACH, Swedish Match Lighters BV, has different roles:

1) Cricket Lighters produced in Assen, The Netherlands:

Within REACH Swedish Match Lighters is seen as a "Down Stream User". All suppliers of raw materials, mainly located within the EU, have declared to (pre-) register the chemicals used, if needed, to comply to REACH. Swedish Match will frequently follow-up and all data will be implemented in the Material Safety Data Sheet for the Lighter products concerned.

2) Cricket Lighters produced outside the EU:

Swedish Match has given Swedish Match Lighters BV the role as EU Representative for Cricket Lighters produced in Manilla, Philippines and Manaus Brazil. For the quantities of Cricket Lighters imported into the EU Market, Swedish Match Lighters BV pre-registered the Lighter Fuel present inside the Lighters. This Lighter Fuel, Liquefied Petroleum Gas, when used in an article in the intended matter, is officially exempted for REACH. Because there is a possibility to release the LPG from the Lighter without ignition, Swedish Match Lighters decided to pre-register.

3) Poppell, Swan and FirePower Lighters produced outside the EU: The producers of these Swedish Match Brand Lighters have chosen the Irish Company CIRS as there EU representative. For those Lighters, Swedish Match Lighters BV will act as distributor and provide the Swedish Match Sales Force with updated MSDS and all documents needed to prove compliance to the REACH Regulation.

Each **Electronic Lighter, produced at any Global Lighter manufacturer**, is igniting by means of a Piezo element (PMA). The hart of the PMA is formed by a Crystal which is made of Lead Zirconate Titanate Ceramics. The percentage of Lead is 60% (g/g) The Crystal is an article according to the Art. 3.3 of the REACH Regulation "*Object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition*". The total weight of Lead within an Electronic Lighter is more than 0.1 % of the total Lighter Weight. This is recognized for some years already (RoHs Directive 2002/95/EC and 2005/618/EC).

The Lead will only come into the environment at the moment of disposal of the Lighter. Still there is no alternative for this critical part and as such the PMA has been exempted for the Directive of Electrical Devices. The total amount of Lead, within Cricket Electronic Lighters, marketed in Europe, is less than 1 ton/year. Although according Art. 7 of the REACH Regulation the PMA Crystals are exempted for REACH, Swedish Match is fully aware of its environmental responsibility and will push the search for an alternative electronic ignition device.

Contact for REACH within Swedish Match Lighters;
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Pre-registration number for LPG in Cricket Lighters: 05-2118159312-48-0000

Swedish Match declared following Consumer Safety Standards as a minimum for each Lighter Brand, produced and or traded by Swedish Match Sales:
ISO 9994 : Lighter Safety Specifications
ISO 22702 : Utility Lighters General consumer safety requirements
EN 13869 : Lighters Child-resistance, Safety requirements and test methods

This document as well as the MSDS of the products are part of the Lloyd's certified, Swedish Match Lighters bv, Quality and Environmental Management System and will be reviewed minimum once a year.

Assen, November 27, 2008.

Ir.P.Verhoog

Director
Swedish Match Lighters bv.