

July 10, 2015



To our Valued Supplier:

We deal with many federal, state, and local regulations for chemical based products. In response to the regulatory environment and to better protect our members and communities Topco is launching a compliance initiative for environmentally sensitive products that we procure for our members. Your cooperation and participation in this compliance program is required.

**Product Assessment & Classification**

Topco has selected the WERCSmart solution offered by UL, Information and Insights (UL, I&I) to help us manage regulatory compliance requirements for all chemicals, over-the-counter health products, pesticides, aerosols, batteries, and other hazardous-material products that you may sell to us.

Your role in this process is to register your product on the UL, I&I portal. UL, I&I will then perform a review of each product to support the regulatory compliance goals of Topco.

**Action Required by Suppliers who are not currently registered**

By August 20, 2015, create an account with WERCS by visiting <https://secure.supplierwercs.com> to set up an account and enter the required information into the WERCSmart portal. Review the FAQ section and the Video Tutorial for helpful information regarding your account and registration of your products. All items within the identified categories purchased by Topco will need to be registered no later than September 15, 2015.

**Action Required by Suppliers who have Topco formulas in the system**

If you already have a WERCSmart account with registered products you sell to Topco, please log into your account and click the button to “Forward Product Registration”. Select Topco as the retailer to receive the data.

**Action Required by Suppliers who do not have Topco formulas in the system**

If products you sell to Topco are not yet registered, log on and click the button “New Product Registration”. Select Topco as the retailer to receive the data.

Going forward, you will need to complete this process for any other products that Topco may purchase, as well as existing items whose formulations, ingredients or UPC's have changed in any way.

**Examples of products that you must register with WERC Smart include:**

**Chemicals:**

Any product that is advertised or labeled to kill, repel, or prevent the growth of any living organism. This includes, for example, anti-microbial products. It also includes all pesticides and other products regulated under the Federal Insecticide, Fungicide, and Rodenticide Act.

Any product that contains a powder, gel, paste, liquid, or gas, and which is not intended for human consumption.

Products intended for human inhalation, consumption, or absorption: lozenges, pills or capsules (e.g. pain reliever, vitamins, water pills)

Medicated swabs, wipes and bandages

Patches (heated and/or medicated)

Energy bars, diet supplements and vitamin drinks

Liquids (e.g. soap, shampoo, cough medicine, eye drops, ear drops, nasal spray and inhalers)

Medicated shampoos, gums, ointments and creams, including suntan lotion

Lip balm, lip creams and petroleum jelly

Contraceptive foams, films, and spermicides

Equipment sold with chemicals (e.g. vaporizer sold with medication, air fresheners, and gel shoe inserts)

Any other over-the-counter medication or supplement of any kind

**Aerosols:**

Any product that contains a compressed gas or propellant.

**Batteries:**

All batteries

Any product that contains a battery of any kind

**Electronics:**

Any product that contains a circuit board (*e.g.*, blinking lights or making sounds)

**Fluorescent Lamps:**

Fluorescent lamps and compact fluorescent lamps

Halogen lamps that are not certified lead-free

High-Intensity Discharge (HID) lamps (*e.g.*, grow lamps)

All proprietary information that you provide to UL, I&I is kept confidential. UL, I&I is committed to the highest levels of security and will not share any proprietary information with Topco. UL, I&I will assess a registration fee to you based on the following schedule of services:

Service	Fee
Transmission of data to Topco with additional review required by UL, I&I. ( <i>i.e.</i> , product already registered with UL, I&I but not previously associated with Topco)	\$40
Associating additional UPC(s) to a previously-assessed product	\$25/product
Product review and transmittal with Supplier-provided MSDSs ( <i>i.e.</i> , product is new to UL, I&I, and Supplier uploads compliant MSDS)	\$180
Product review and transmittal with UL, I&I -authored MSDS ( <i>i.e.</i> , product is new to UL, I&I, and UL, I&I authors compliant MSDSs)	\$650

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We greatly appreciate your cooperation and partnership in this project. It will help us both to manage our regulatory compliance responsibilities and alleviate noncompliance. It will help minimize waste, and aid in our efforts toward environmental sustainability, which will benefit the communities in which we live and serve.

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If you have questions, need more information about this initiative, or need additional information regarding the measures your company now needs to follow, please contact: Lauren Daley at [ldaley@topco.com](mailto:ldaley@topco.com)

Thank You.

Sincerely,

Howard Popoola

Vice President  
Product Integrity and Compliance  
Topco Associates