



April 2016

This letter is issued in response to the National Advertising Division (NAD) of the US Better Business Bureau's referral to the Federal Trade Commission for further review of claims made by LEI Electronics, Inc., maker of Eco Alkaline Batteries, as to the products' carbon neutrality:

Carbonfund.org Foundation, Inc., a 501(c)(3) non-profit organization, maintains a Certified Carbonfree® Products program. Product manufacturers and distributors may apply for product registration in compliance with the program protocol, which requires the completion of a Product Carbon Footprint, assessed through a Life Cycle Analysis of each product to be registered, in compliance with one or more of the internationally accepted scientific standards for Product Carbon Footprint and Life Cycle Analysis reporting.

LEI Electronics, Inc. registered several of its Eco Alkaline Batteries products in this program in 2010, then renewed the product registration each year, in compliance with program protocol and requirements. In 2014, LEI Electronics submitted an updated Product Carbon Footprint and Life Cycle Analysis, completed by Enviro-Mark Ltd., for all products registered in the Certified Carbonfree® Products program. The Life Cycle Analysis was certified by Enviro-Mark Ltd. as in compliance with the British Standards Institution's Publicly Available Specification (PAS) 2050:2011 standard. Product Carbon Footprint and Life Cycle Analysis reports completed and certified in compliance with this standard ensure that Certified Carbonfree® Products meet competent and reliable scientific evidence to substantiate the related environmental claims.

As part of the Certified Carbonfree® Products program, LEI Electronics reports quarterly sales of each unit of registered product, then calculates the total Product Carbon Footprint for the quarter's product sales, and makes a donation payment to Carbonfund.org for the purchase and retirement of the corresponding total quantity of third-party verified and validated carbon offsets, meeting internationally recognized standards, to neutralize the total Product Carbon Footprint from that quarter. These carbon offsets, through the stringent third-party verification and validation process, are confirmed to have already occurred and have already reduced the corresponding quantity of carbon dioxide emissions per metric tonne.

All of the information and documentation referenced above was provided to or offered to the NAD for its review prior to issuance of its report.

Questions and inquiries may be submitted to:

Linda Kelly
Business Partnerships Manager
Carbonfund.org Foundation, Inc.
lkelly@carbonfund.org
240-247-0630 x 633