

# Product Safety and Regulatory Notice

## VOC Content of Private Label Formulated Products Required in WERCS



Suppliers of private label formulated products are required to enter VOC content into WERCS by November 22, 2013

### ATTENTION:

- Merchants and Suppliers of formulated products for Walmart, Walmart.com, Sam's Club and Samsclub.com

October 24, 2013

### BACKGROUND:

The United States EPA, various state agencies, and local air quality districts place limits on the amount of volatile organic compounds (VOCs) contained in certain formulated products. Manufacturers, wholesalers, and retailers of formulated products can face criminal and civil penalties if products exceed the allowable VOC limits for that product category. While Walmart and Sam's Club require suppliers to ensure that all products sold are compliant with applicable VOC limits, the collection of VOC levels in private label formulated products through the WERCS is necessary to successfully manage our VOC compliance program.

### GENERAL REQUIREMENTS:

All suppliers of private label formulated products are required to update WERCS with the VOC content of their products. Product Safety and Compliance will review this information and notify the merchandising team and the supplier if any products are identified as being non-compliant for any location. Products for which the VOC data is not updated in WERCS, or are found to have VOC content that exceeds the legal limits, will be removed from sale. As newly created items are entered into WERCS, they will be reviewed to ensure compliance. Non-compliant products will be removed from sale.

### ACTION NEEDED:

**Merchants** – Please forward this Notice to all suppliers of private label formulated products in your category. **(NOTE: Compliance does not have a distribution list and will not be forwarding to any suppliers.)**

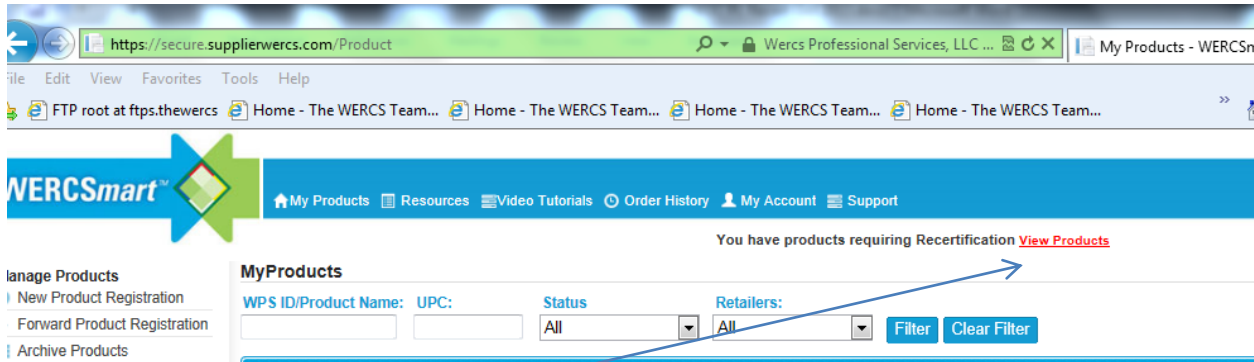
Please refer to *Compliance Toolbox 33 – Private Label* to determine what products are considered private label.

**Suppliers** – Please access WERCS by (date) to update VOC content for all active private label formulated products that contain VOCs which you supply to Walmart and Sam's Club. Instructions on how to update WERCS information can be found in the following VOC Supplier Re-Certification Instructions.

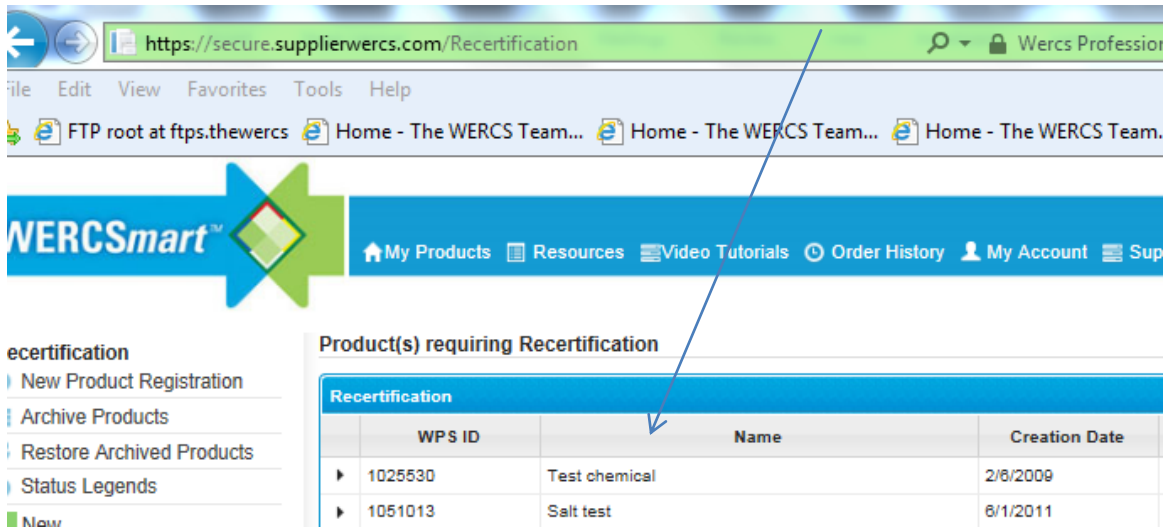


## VOC SUPPLIER RE-CERTIFICATION INSTRUCTIONS:

Vendors may access the list of identified products by logging into their account at <https://secure.supplierwercs.com/>. Vendors will see a scrolling message inviting them to view the products which require Recertification:



Clicking on this link will bring up a list of products which require Recertification.



Selection of a product will display the reason for the recertification request, and the available actions for the product. For this effort, the reason for recertification will include "VOC Update". Vendors will have two options for each product; to either archive the product, or update the VOC data and proceed with the recertification process.

If a product is archived no further action will be required. **NOTE: A product should only be archived if it is no longer valid, and will not be active again in the future.** If the vendor selects Edit Data, they will be able to update the specified fields to support VOC compliance questions.



WERCSmart™

My Products Resources Video Tutorials Order History My Account Sup

Recertification

- New Product Registration
- Archive Products
- Restore Archived Products
- Status Legends

New Submitted Data Queued to Retailer On Hold SDS Needs Acceptance

Product(s) requiring Recertification

WPS ID	Name	Creation Date
1025530	Test chemical	2/5/2009
1051013	Salt test	6/1/2011
1103830	OTC Test	6/30/2013

VOC Update Archive Edit Data

Once Edit Data is selected, the vendor will be able to first select a revised Recommended Use for the product. This will redirect the product into the VOC logic flow.

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Product data

- Product Type
- VOC Data

Product Data Entry > Product Type

In the space below, please provide the name of your product.

OTC Test

From the menu below, please select the category of Recommended Use for your product.

Home Improvement

Faux Finishing Coating - Decorative

Back Summary Next Cancel

The next screen will ask for verification of the Recommended Use and the formulation. **Note: This update does not allow for formulation updates which may impact other WERCSmart™ results. If a formulation has been revised, a new assessment will be required.**



If the data is correct the vendor should select "Yes" at the bottom of the screen, and press the Next button to advance.

Product Data Entry > VOC Data verification

Based on the information provided, this product may be subject to regulation under applicable VOC (Volatile Organic Compounds) regulations.

Please take a moment to verify the data provided:

Home Improvement

Faux Finishing Coating - Decorative

Product Composition

Enter each Component By CAS # or Name

CAS Number	Chemical Name	
7732-18-5	Water	100
	Total Percent:	100

Delete Save

Please confirm above data is correct. It will be used to determine compliance with applicable VOC regulations.

If data is not correct. Please modify the Product Composition or select a different Product Category.

Yes, the data is correct.

Back Summary Next Cancel

The product will now enter the VOC flow and present a series of questions about the product, including the VOC content.

Product Data Entry > VOC Data - SCAQMD (South Coast Air Quality Management District)

Is this product included in an Alternative Control Plan, exempted as an Innovative Product, or subject to any other exemption or variance under applicable VOC?

Yes - Upload certification letter (optional certification form) and upload

No - Continue with VOC questions

Is this a low solids product?

Yes

No

Enter VOC content of product in g/L, less water and exempt compounds.

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Back Summary Next Cancel



Based on the answers given, the WERCSmart™ system will present immediate feedback to the vendor as to the status of their product with respect to the applicable VOC regulations.

The screenshot shows the 'Product Data Entry > VOC Result' page. It displays the date of analysis (10/04/2013) and a message indicating the product is an Architectural Coating. A table lists VOC limits for 'Faux Finishing Coating - Decorative' with a limit of 200 g/L. Below the table, it states the VOC content of the product is 10 g/L, less water and exempt compounds, and that it complies with the most restrictive VOC compliance limit per the table and does not exceed the limits specified by the South Coast Air Quality Management District. Navigation buttons for Back, Summary, Next, and Cancel are visible at the bottom.

Use	VOC Compliance Limit	Regulation
Faux Finishing Coating - Decorative	200	(g/L) less water & exempt

Next, the vendor will be given the opportunity to review the product data:

The screenshot shows the 'Product Data Summary' page. It includes fields for product name, OTC Test, and Recommended Use (Faux Finishing Coating - Decorative). A table lists the product composition with CAS Number, Chemical Name, and percentage. Below the table are questions regarding Nanomaterials, Private Label status, and battery content, all with 'No' selected as the answer.

CAS Number	Chemical Name	Percentage
7732-18-5	Water	100
Total Percent:		100



If no other services are ordered, the vendor will receive a \$0 (zero) balance invoice via email upon Checkout.



The vendor may then continue with other portal submissions or exit WERCSmart™.



Products submitted for recertification will be submitted through the WERCSmart™ functionality in a manner similar to new submissions.

While a product is in Recertification, it cannot be forwarded to another retailer, nor may a UPC be added to the submission. The submission is "locked" until the product is either Archived, or the VOC Recertification is executed.

For additional information on VOC regulations, please see the "VOC Users' Guide" available at the WERCSmart™ website.

**DISCLAIMER:**

Walmart does not provide legal advice to its suppliers, so suppliers should seek their own legal counsel on how to comply with all laws applicable to their product.

**QUESTIONS OR COMMENTS:**

Suppliers may submit questions or comments by emailing them to [gmcomply@wal-mart.com](mailto:gmcomply@wal-mart.com).

Suppliers who have any questions regarding imputing VOC content into WERCS should direct their questions to customer service representatives at WERCS by clicking on the "Support" link on the WERCSmart™ homepage. <https://secure.supplierwercs.com/>.

To learn more about the Product Safety and Compliance Library please refer to the PSC Library Welcome Document: Retail Link → Site Map → Product Safety and Compliance Library → "1 PSC Library Welcome Document – REVIEW FIRST" folder.

