



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

October 21, 2024

Jeremy Smeltser  
Chief Financial Officer  
Spectrum Brands Holdings, Inc.  
3001 Deming Way  
Middleton, WI 53562

**Re: Spectrum Brands Holdings, Inc.**  
**Form 10-K for the Fiscal Year Ended September 30, 2023**  
**Filed November 21, 2023**  
**File No. 001-04219**

Dear Jeremy Smeltser:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing