



United States

Consumer Product Safety Commission

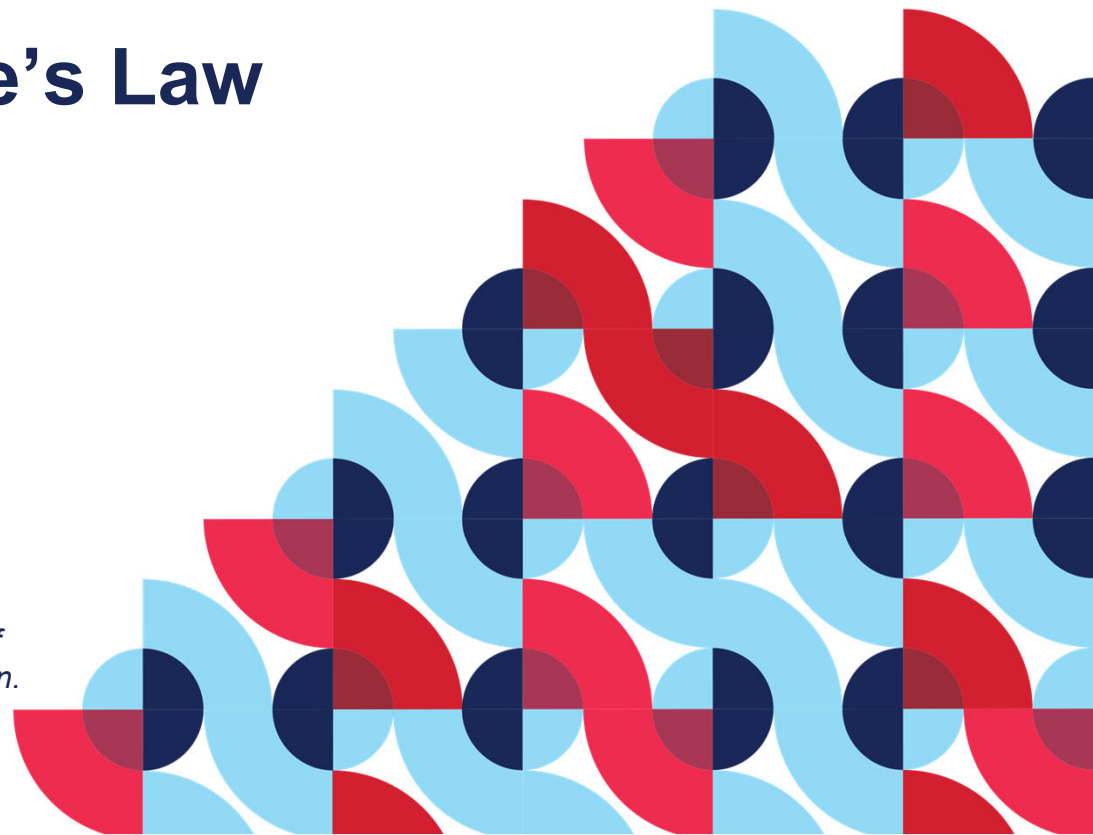
Breaking Down Reese's Law

Webinar

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Presented by: Stephen Lee (SBO Team)

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Agenda

- Background
- Special Packaging
- 16 CFR part 1263
- Enforcement Discretion
- Effective Date Summary
- Certification
- Q&A

Background



- Reese's Law (P.L. 117-171) enacted in 2022
- Section 2 of Reese's Law requires CPSC to promulgate rulemaking for consumer products containing or designed to use button cell or coin batteries
- Section 3 of Reese's Law requires button cell or coin batteries to utilize special packaging

Special Packaging



- Packaging for button cell or coin batteries (not the battery compartment of a product) must meet specifications of 16 CFR § 1700.15
- Visit www.cpsc.gov/PPPA for guidance on special packaging
- Does not apply to products that meet the marking and packaging provisions of ANSI C18.3M.

16 CFR part 1263, except § 1263.4



- Pursuant to section 2 of Reese's Law, incorporates by reference ANSI/UL 4200A-2023
 - Performance and labeling requirements for consumer products containing or designed to use button cell or coin batteries
- Does not apply to:
 - Children's toys subject to 16 CFR part 1250
 - Zinc-air button cell or coin batteries

16 CFR part 1263 (cont.)



- Battery compartment must be difficult for children to access
 - Compartment is sealed, not allowing battery to be removed or replaced
 - Tool is required to open the compartment
 - Opening the compartment requires at least two independent and simultaneous actions

16 CFR part 1263 (cont.)



- Battery compartments that use screws or similar fasteners must use captive screws/fasteners except for the following:
 - Battery is only accessible through the removal of multiple enclosures or panels using a tool
 - Product is only to be opened by a professional service center

Q: Are retail displays with “Try Me” buttons subject if they contain a button cell or coin battery?

Yes. “Try Me” buttons (including those in retail displays) are within the scope of the final rule because they are intended to be used by consumers.

For more information, see www.federalregister.gov/d/2023-20333/p-161.

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test Only for compartments made of plastic
 - Battery replacement test
 - Drop test Place in an oven for 7 hours, temp set to the greater of 70°C (158°F) or 10°C (18°F) higher than max operating temp
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Only for compartments intended to be opened
- Open compartment, replace battery, then close compartment 10 times

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Only for portable/hand-held products
- Drop from a height of 1.0 m (39.4 in) onto hardwood surface at least 13 mm (0.5 in) thick mounted on two layers of nominal 19 mm (0.75 in) thick plywood placed on concrete or equivalent

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Steel sphere 50.8 mm (2 in) in diameter is dropped or swung as a pendulum onto compartment from a height that induces 2 J (1.5 ft·lbf)
- Repeat total 3 times

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Apply 300 ± 5 n (74.2 ± 1.1 lbf) force for 10 seconds to exposed surfaces using flat surface measuring approximately 100 x 250 mm (3.9 x 9.8 in)

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Only for compartments that can be grasped with fingers or teeth
- Run Torque Test from ASTM F963 with torque of 0.50 Nm (4.4 in-lbf)

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Only for compartments that can be grasped with fingers or teeth
- Run Tension Test from ASTM F963 with force of 72.0 N (16.2 lbf)

16 CFR part 1263 – Performance



- Batteries must not be accessible or liberated as a result of abuse testing
 - Stress relief test
 - Battery replacement test
 - Drop test
 - Impact test
 - Crush test
 - Torque test
 - Tension test
 - Compression test
- Only for accessible compartments that are inaccessible to flat surface during drop test
- Run Compression Test from ASTM F963 with force of 136 N (30.6 lbf)

Q: Are there exceptions for button cell or coin batteries that are not intended to be removable?

No. Neither Reese's Law, 16 CFR part 1263, nor UL 4200A provide for an exception for button cell or coin batteries that are not intended to be removable.

Section 5.7 of UL 4200A notes requirements for products with batteries that are not intended to be removed or replaced.

Q: Are products with batteries not intended to be removed or replaced subject to abuse testing?

Yes. The abuse tests are to determine if a battery is liberated and/or accessible due to potential misuse, not whether the battery housing is adequate.

16 CFR part 1263 – Labeling



- Must be in English, prominent, legible, easily discernible, and permanent
- If printed on a label in color, must follow color scheme of example figures in UL 4200A
- Minimum size requirements
 - Safety triangle and text, see Table 7A.1 of UL 4200A
 - Safety triangle with battery: 7 x 9 mm
 - Circular icon of parent holding box above child: 8 mm diameter



16 CFR part 1263 – Labeling (package)

- Packaging and any accompanying literature must bear warnings

WARNING


- **INGESTION HAZARD:** This product contains a button cell or coin battery
- **DEATH** or serious injury can occur if ingested.
- A swallowed button cell or coin battery can cause **Internal Chemical Burns** in as little as **2 hours**.
- **KEEP** new and used batteries **OUT OF REACH** of **CHILDREN**
- **Seek immediate medical attention** if a battery is suspected to be swallowed or inserted inside any part of the body.





16 CFR part 1263 – Labeling (package)

- Packages with limited space may use alternative labeling
 - Principal display panel:

| ⚠ WARNING | |
|---|---|
| <ul style="list-style-type: none">• INGESTION HAZARD: This product contains a button cell or coin battery• DEATH or serious injury can occur if ingested.• A swallowed button cell or coin battery can cause Internal Chemical Burns in as little as 2 hours. |  |

- Secondary display panel:

| ⚠ WARNING | |
|---|--|
| <ul style="list-style-type: none">• KEEP new and used batteries OUT OF REACH of CHILDREN• Seek immediate medical attention if a battery is suspected to be swallowed or inserted inside any part of the body. | |

- Products without packaging must bear full label via hang tag or sticker label on product

16 CFR part 1263 – Labeling (package)



- Package must also include:
 - Identity of battery type
 - Nominal voltage
 - (dependent) Statement indicating product contains non-replaceable batteries

16 CFR part 1263 – Labeling (product)



- Product must bear warning



- Product with small surface area may use the following icon



- Product with surface not practicable for labeling must either:
 - Have packaging that bears the full labeling
 - Use a hangtag or sticker that bears the full labeling affixed to the product

Q: Does the on-product marking have to be an adhesive label?

No. The marking can be part of a mold or applied using means other than an adhesive label.

16 CFR part 1263 – Labeling (other)



- Instructions and manuals must include specific statements

All products:

- “Remove and immediately recycle or dispose of used batteries according to local regulations and keep away from children. Do NOT dispose of batteries in household trash or incinerate.”
- “Even used batteries may cause severe injury or death.”
- “Call a local poison control center for treatment information.”
- Identification of compatible battery type
- Nominal battery voltage
- “Non-rechargeable batteries are not to be recharged.”
- “Do not force discharge, recharge, disassemble, heat above (manufacturer’s specified temperature rating) or incinerate. Doing so may result in injury due to venting, leakage or explosion resulting in chemical burns.”

16 CFR part 1263 – Labeling (other)



- Instructions and manuals must include specific statements

Products with replaceable batteries:

- “Ensure the batteries are installed correctly according to polarity (+ and -).”
- “Do not mix old and new batteries, different brands or types of batteries, such as alkaline, carbon-zinc, or rechargeable batteries.”
- “Remove and immediately recycle or dispose of batteries from equipment not used for an extended period of time according to local regulations.”
- “Always completely secure the battery compartment. If the battery compartment does not close securely, stop using the product, remove the batteries, and keep them away from children.”


Products with non-replaceable batteries:

- Statement indicating product contains non-replaceable batteries



16 CFR § 1263.4

- Packaging for button cell or coin batteries sold/packaged separately must bear warning

| ⚠ WARNING | |
|---|--|
| <ul style="list-style-type: none">• INGESTION HAZARD: DEATH or serious injury can occur if ingested.• A swallowed button cell or coin battery can cause Internal Chemical Burns in as little as 2 hours.• KEEP new and used batteries OUT OF REACH of CHILDREN• Seek immediate medical attention if a battery is suspected to be swallowed or inserted inside any part of the body.• For treatment information call: 1-800-498-8666. |  A blue circular icon containing a white silhouette of an adult figure standing next to a smaller white silhouette of a child figure, representing a family or caregiver-child interaction. |



16 CFR § 1263.4 (cont.)

- Packaging with limited space can use alternative labeling
 - Principal display panel:



- Secondary display panel:

⚠️WARNING INGESTION HAZARD • DEATH or serious injury can occur • A swallowed button cell or coin battery can cause **Internal Chemical Burns** in as little as **2 hours** • Keep new and used batteries **OUT OF REACH OF CHILDREN** • **Seek immediate medical attention** if a battery is suspected to be swallowed or inserted inside any part of the body • For treatment information call: 1-800-498-8666.

16 CFR § 1263.4 (cont.)



- Labels for batteries sold separately must include the following statements, or similar:
 - Keep in original package until ready to use.
 - Immediately dispose of used batteries and keep away from children. Do NOT dispose of batteries in household trash.

Enforcement Discretion



- Special packaging requirement for zinc-air button cell or coin batteries applies to product manufactured or imported after March 8, 2024
- Testing and labeling requirements of ANSI/UL 4200A-2023 applies to product manufactured or imported after March 19, 2024

Effective Date Summary



| Product Type | Requirement | Effective Date (and source) |
|---|---|---|
| Button cell or coin battery packaging | Must be in packaging that meets 16 CFR § 1700.15 | Products manufactured or imported after February 12, 2023 (P.L. 117-171) |
| Zinc-air button cell or coin battery packaging | Must be in packaging that meets 16 CFR § 1700.15 | Products manufactured or imported after March 8, 2024 (enforcement discretion) |
| Product containing or designed to use button cell or coin battery | Must meet performance and labeling requirements of ANSI/UL 4200A-2023 | Products manufactured or imported on or after March 19, 2024 (enforcement discretion) |
| Button cell or coin battery packaging | Must meet labeling requirements of 16 CFR § 1263.4 | Products manufactured or imported after September 21, 2024 (88 FR 65296) |

Certification



- Every domestic manufacturer or importer of a product subject to a mandatory consumer product safety rule must issue a certificate of compliance that they meet the rule based on testing
 - General Certificate of Conformity (GCC) for general-use products
 - Children's Product Certificate (CPC) for products primarily designed or intended for children 12 years old and under
- Illustrative examples of certificates available at www.cpsc.gov/CPC and www.cpsc.gov/GCC.

Certification (cont.)



- 1) Identification of the product
- 2) Citation to each safety rule
- 3) Identification of importer or domestic manufacturer
- 4) Contact information for individual maintaining test results
- 5) Date and place of manufacture
- 6) Date and place of testing
- 7) Identification of testing laboratory

Certification (cont.)



- 1) Identification of the product
- 2) Citation to each safety rule
- 3) Identification of importer or domestic manufacturer
- 4) Contact information for individual maintaining test results
- 5) Date and place of manufacture
- 6) Date and place of testing
- 7) Identification of testing laboratory

P.L. 117-171 § 3(a) – Button cell or coin battery packaging

16 CFR § 1263.3 – Consumer products containing button cell or coin batteries

16 CFR § 1263.4 – Button cell or coin battery package labeling



Resources

- CPSC's button cell and coin battery business guidance page:
www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Button-Cell-and-Coin-Battery
- CPSC's business guidance library:
www.cpsc.gov/GuidanceLibrary
- Business Education playlist on YouTube:
www.youtube.com/playlist?list=PLPbl8bR243fF7PVUkmRDrxZPjLsCse6xq

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www.cpsc.gov/SBOContact

Toll Free: (888) 531-9070

SBO@cpsc.gov

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