



Reese's law for coin and button cell batteries

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Reese's Law Mandates Changes

Reese's Law was established in 2022 to mandate coin and button cell battery safety requirements at a federal level, establishing requirements varying from certification to performance for the intended purpose of protecting children and consumers against the hazard of ingesting button or coin cell batteries. Reese's Law employs ANSI/UL 4200A-2023 to ensure battery compartments are secure and battery packaging warnings are in place.

In September 2023, ANSI/UL 4200A-2023, became the CPSC regulatory safety standard for consumer products using Button Cell or Coin Cell Batteries in their design.

Toys containing Button Cell or Coin Cell Batteries would be regulated separately through the newest revision of the ASTM F963-2023 Toy Standard which also called out the requirements for performance and labeling requirements per 16 CFR part 1263.

What

Manufacturers of applicable children's products will be required to have their product tested by a CPSC-accepted, third-party laboratory and provide a Children's Product Certificate (CPC).

Manufacturers of applicable general-use consumer products will require a General Certificate of Conformity (GCC).

All manufacturers will be required to self-certify with the CPSC that their products meet the new requirements.

All consumer products containing a button cell or coin battery are subject to these new requirements.

How

Construction Requirements – rule requires that button cell or coin batteries must not become accessible or liberated when tested to a series of performance and accessibility tests. Under ANSI/UL 4200A-2023, requiring a coin or tool or two independent, simultaneous movements by hand to

open a battery compartment addresses child access to the battery compartment. The rule also requires that accessing the battery compartment be "senior-friendly".

Performance Requirements – The rule requires that products designed to or do contain button cell or coin batteries pass a litany of performance tests outlined in ANSI/UL 4200A-2023. These tests include crush, drop, impact, torque, and tension tests, among other ones, that must be performed under specific conditions.

Labeling Requirements – Specific warning labels are required on the packaging of all button cell and coin button batteries, whether sold individually or packaged separately with a consumer product. Warning labels are also required on the packaging of and on consumer products with pre-installed batteries, as well as on the instruction manuals included with these products. Warning labels must meet the various specifications including stated dimensions for text size and placement, outlined in ANSI/UL 4200A-2023.

Additional Labeling Requirements – In addition to the labeling requirements included in ANSI/UL 4200A-2023, CPSC also requires additional labeling requirements for affected batteries and products and must exhibit specific warning labels, as well as warning statements that meet the dimensional text size requirements based on the size of the front panel. The warning label must also include the contact information for the National Battery Ingestion Hotline.

Certification – Importantly, the final rules require manufacturers of non-toy children’s products to receive a certification of compliance with the requirements from a third-party, CPSC-accepted laboratory. All other affected products must issue a general certificate of compliance (GCC), certifying that their products comply with the labeling and performance regulations they are subject to. Importantly, children’s toy products are exempt from Reese’s law, if they comply with ASTM F963.

Compliance

Per ANSI/UL 4200A-2023, the requirements for consumer products containing or designed to use button cell or coin batteries are as follows:

- Battery compartments containing replaceable button cell or coin batteries must be secured such that they require the use of a tool or at least two independent and simultaneous hand movements to open.
- Button cell or coin battery compartments must not allow such batteries to be accessed or liberated as a result because of use and abuse testing.
- The packaging for the overall product must bear a warning label.
- The product itself must bear a warning label, if practicable.
- Provided instructions and manuals must include all the applicable warnings.

By statute, the rule does not apply to toy products designed, manufactured, or marketed as a plaything for children under 14 years of age if the toy products are in compliance with the battery accessibility and labeling requirements of 16 CFR part 1250, which incorporates by reference ASTM F963-23; Section 4.25 of the toy standard contains requirements for battery-operated toys.

Section 2 of Reese’s Law, CPSC published a separate final rule that establishes warning label requirements for the packaging of button cell or coin batteries, including batteries that are packaged separately with a consumer product, per 16 CFR 1263.4. This requirement will apply to products manufactured or imported after September 21, 2024.

Section 3 of Reese’s Law requires “any button cell or coin battery sold, offered for sale, manufactured for sale, distributed in commerce, or imported into the United States, or included separately with a consumer product sold, offered for sale, manufactured for sale, distributed in commerce, or imported into the United States” to utilize packaging that meets the requirements of 16 CFR 1700.15.

On March 8, 2023, the Commission voted to instruct the Office of Compliance and Field Operations to exercise enforcement discretion for the packaging requirements for zinc-air button cell or coin batteries—a technology used to power hearing aids and other hearing assistive technologies; therefore, at this time special packaging for zinc-air button cell or coin batteries will not be enforced until March 8, 2024.

When

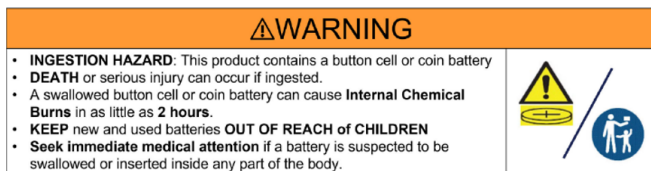
Product type	Requirement	Effective Date (and source)
Button cell or coin battery packaging	Must be in packaging that meets 16 CFR § 1700.15	Products manufactured or imported after February 12, 2023 (P.L. 117-171)
Zinc-air button cell or coin battery packaging	Must be in packaging that meets 16 CFR § 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 after March 19, 2024 (enforcement discretion)
Button cell or coin battery packaging	Must be in packaging that meets 16 CFR § 1263.4	Products manufactured or imported after September 21, 2024 (88 FR 65296)

Details

All applicable warnings must be in their complete form and entirety, with the package and product to inform the consumer of the presence of a small cell battery (coin cell, button cell or any battery capable of fitting in defined CPSC choke tube) per 16 CFR and or UL 4200A. The labeling guidelines are:

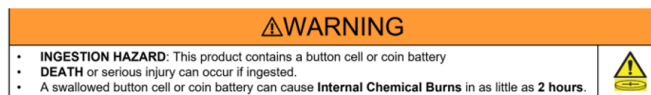
Package Labeling

- English, prominent, legible, easily distinct, permanent.
- If on label in color, follow color scheme per UL 4200A.
- Minimum size requirements
 - Safety triangle and text, see Table 7A.1 of UL 4200A.
 - Safety triangle with battery: 7 x 9 mm
- Circle icon of parent holding box above child: 8 mm Dia
- Packaging and literature must bear warnings.



Packages with limited space may use alternative labeling.

- Principal display panel:



- Secondary display panel:



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

- Package must also include:
 - Identity of battery type
 - Nominal voltage
 - (Depending on product design and nomenclature) Statement indicating product contains non-replaceable batteries.



Product with small surface area may utilize the following icon in its entirety.



Product with surface area not possible 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.

