

FACT SHEET

REESE'S LAW: BUTTON CELL & COIN BATTERY

Federal safety requirements for button cell or coin batteries.

Intertek is a trusted partner for testing and certification. As a CPSC-accepted, third-party laboratory, we ensure safety and compliance, offering Children's Product Certificates and General Certificates of Conformity (GCC) with precision and expertise.



Overview

Reese's Law, signed by the Biden administration in April 2022, has placed new safety requirements on consumer products containing a button cell or coin battery. In February 2023, the Consumer Product Safety Commission (CPSC) released a notice to update ANSI/UL 4200A and establish performance and labeling requirements for products containing these batteries, in order to eliminate (or reduce) the risk of ingestion of these batteries by children.

ANSI/UL 4200A-2023: Requirements for Consumer Products

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 of use and abuse testing.
- The packaging for the overall product must bear a warning.

- The product itself must bear a warning, if practicable.
- Accompanying instructions and manuals must include all of the applicable warnings.

Packaging Requirements

Effective February 12, 2023, Section 3 of Reese's Law required "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.

Battery Packaging Labeling Requirements

The regulations stipulate that all button cell and coin batteries, whether sold individually or with a consumer product, must include warning labels. This requirement extends to consumer products with pre-installed batteries, their packaging, and associated literature. The warning labels must adhere to the specifications outlined in UL 4200A.

Compliance

All consumer products containing a button cell or coin battery are subject to

these new requirements. This includes any product for which UL 4200A is a reference standard, as well as any product containing or designed for a button cell or coin battery that may not explicitly reference UL 4200A.

Dates

September 21, 2023:

The CPSC published two final rules in the Federal Register for 16 CFR 1263:

- a direct final rule that adopts UL 4200A as the mandatory safety standard for button cell and coin batteries and products containing these batteries; and
- a final rule that mandates additional labeling requirements

March 8, 2024:

Special packaging for zinc-air button cell or coin batteries will be enforced.

March 19, 2024:

The enforcement window begins, requiring all consumer products containing a button cell or coin battery comply with UL 4200A.

September 21, 2024:

Effective date of ruling (88 FR 65296) for enforcement of warning label requirements for packaging.

REESE'S LAW: BUTTON CELL & COIN BATTERY



What is Reese's Law?

Enacted in 2022, Reese's Law mandates federal safety requirements for button cell or coin batteries to protect children and other consumers against hazards associated with the accidental ingestion of button cell or coin batteries by requiring the Consumer Product Safety Commission to promulgate a consumer product safety standard to require child-resistant closures on consumer products that use such batteries, and for other purposes.

Who is subject to these changes?

Any consumer product containing a button cell or coin battery will need to be evaluated to confirm that it is in compliance with the new requirements. This includes any product that uses these batteries in conjunction with the product or when sold separately.

Are there any exclusions to this law?

This ruling excludes Zinc-air button cell or coin batteries. Toy products for children under 14 years of age that are compliant with the battery accessibility and labeling requirements of 16 CFR part 1250, also known as the Toy Standard (ASTM F963), are also exempt.

What are the recommended next steps?

- Review your company's products sold in the United States.
- Evaluate products and adjust as required for compliance.
 - 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 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.

What testing is required to comply?

Performance tests are required based on construction and use criteria. Some of these performance requirements include:

- Accessibility evaluation
- Performance tests for consumer products containing button cell or coin



batteries

- Preconditioning
- Abuse – Drop test, impact test, crush test, compression test, torque test and tension test

What are some common standards that reference UL 4200A?

Approx. 30 product standards include UL 4200A as a reference standard. Examples include:

- UL 507
- UL 73
- UL 244B
- UL 399
- UL 867
- UL 970
- UL 1261

What if my product is certified to a standard that does not reference UL 4200A?

Note that not every product that contains a coin cell battery has UL4200A listed as a reference standard. If your product fits in this category, you are still required to adhere to the new requirements.

Where can I find more information concerning Reese's Law?

- <https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Button-Cell-and-Coin-Battery>
- Email us at: reeselaw@intertek.com

What is the deadline for my product to comply?

March 19th, 2024

What is Intertek's compliance strategy?

Intertek will ensure that all new consumer products being evaluated for ETL certification are evaluated to determine whether they contain button cell or coin batteries and comply with UL 4200A.

Existing ETL certified products will also be reviewed. To identify all existing ETL certified products that contain a button cell or coin battery, Intertek is sending a Standard Update Notice to all ETL-listed manufacturers. Please respond to this inquiry in a timely manner.

FOR MORE INFORMATION



Americas
+1 800 WORLDLAB (967 5352)

Europe
+44 1372 370900

Asia
+852 2173 8888



icenter@intertek.com



[Intertek.com](https://www.intertek.com)