



Understanding the Industry Guideline for Consumer Goods that Contain Button Batteries

June 2019

The voluntary Industry Guideline for Consumer Goods that Contain Button Batteries (Guideline) was developed to assist suppliers (that is, manufacturers, distributors, importers, retailers and online suppliers) in making responsible decisions about button battery safety when procuring, designing, developing or retailing button batteries or button battery-powered devices.

The Guideline is targeted at measures likely to be most effective for reducing child exposure to button batteries. This factsheet provides a summary of the key issues identified in the Guideline.

Issue

Button batteries are used in a wide range of consumer products including TV remote controls, cameras, watches, calculators, greeting cards, scales, torches and many others. They are often also found in child-attractive items such as toys, novelties, disposable souvenirs and gadgets with LED lights.

Ingested button batteries can lodge in the oesophagus and cause chronic injuries and tragic loss of life.

Consumer products that contain button batteries should be secured so that the batteries are not accessible to young children. Products with replaceable button batteries should include a warning that button batteries are hazardous and provide relevant safety information.

Suppliers are encouraged to adhere to this Guideline to help prevent serious injuries and save lives.



Further information about the hazards of button battery ingestion can be found here: www.productsafety.gov.au/products/electronics-technology/button-batteries

Button battery types

For the purpose of this document, all flat disc-shaped cells or batteries are referred to as *button batteries* regardless of their size or chemistry. Other names used for the same items are 'coin', 'disc' and 'button' cells or batteries.

Although coin-sized lithium button batteries are known to have caused more serious injuries and deaths to children, all button batteries are potentially dangerous to children who access them.

Supplier responsibilities

Under the Australian Consumer Law, suppliers must not make false or misleading claims about the quality, value, price, age or benefits of products or services, or any associated guarantee or warranty.

The Australian Consumer Law provides consumer guarantees when a trader supplies goods to a consumer. These are statutory guarantees, and include that products supplied are of an acceptable quality and are safe. If a consumer has been supplied a product that is not of acceptable quality or is unsafe they can assert their rights to the supplier and seek a remedy from the trader who supplied it to them.

Suppliers should also monitor and investigate safety-related consumer feedback about products they supply and take appropriate corrective action where necessary. If a supplier becomes aware of an injury, illness or death associated with a product it supplied, it may be necessary to report the incident to the Australian Competition and Consumer Commission (ACCC) within two days of receiving the report.

Further information about mandatory reporting of consumer injuries and deaths can be found on the ACCC's Product Safety Australia website: www.productsafety.gov.au/product-safety-laws/legislation/mandatory-reporting

Essential requirements for adhering to the industry Guideline

To adhere to this industry Guideline, consumer products (including a peripheral device such as a remote control and any replacement batteries provided with it) requiring one or more consumer-replaceable button batteries that are likely to be accessible to young children under normal use or reasonably foreseeable misuse MUST:

Have a battery compartment (or other enclosure) that prevents access to the batteries by young children in accordance with all of the following:

- a. Access to the batteries requires the use of a tool or the application of two or more independent AND simultaneous actions; and
- b. battery access securing devices must be easily re-installed with no reduction in security; and
- c. battery access securing devices must be durable such that they do not break or become ineffective after multiple uses; and
- d. be designed and manufactured such that the batteries are not accessible to young children when the goods and the packaging of any replacement batteries provided are subjected to normal use or reasonably foreseeable misuse

AND:

- e. Have information available where the product is displayed for sale (including online) indicating that the product (or any included peripheral device) requires button batteries to operate and that these are hazardous to young children. The information can be provided on packaging or separate signage.



Button batteries not intended to be replaced by the consumer must not be accessible when the device is subjected to normal use and reasonably foreseeable misuse and must also not be accessible without the use of a tool that would be expected to be used by a technician, for example a screwdriver or spanner but not a coin.

The essential requirements outlined in this Guideline are based on current understanding of best practice.

How to further reduce hazards

To further reduce the likelihood of young children being harmed by button batteries, suppliers should consider:

- whether to supply products containing button or coin-sized lithium batteries at all
- whether products could be powered by other types of batteries that do not present the same danger as button batteries
- conducting audits of existing products and removing items that do not adhere to this Guideline
- supplying only button batteries and products that contain button batteries that adhere to this Guideline
- reviewing the height at which button batteries and products containing button batteries are displayed in stores, so they are less accessible to young children
- selecting brands of batteries that are supplied in suitable child-resistant packaging and are marked with warnings alerting consumers to the hazards to young children
- that packaging or instructions of button battery products should be marked with a warning alerting consumers to the dangers of young children ingesting/inserting button batteries
- alerting consumers to the risks of button batteries by providing warnings in store.

More information

You can access the full English version of the Guideline here: www.productsafety.gov.au/publication/industry-code-for-consumer-goods-that-contain-button-batteries

The Guideline includes suitable statements and symbols for use in warnings and packaging as well as a list of relevant safety standards.

Further information about responsible sourcing of products and testing for consumer products can be found here:

- Responsible sourcing of products
www.productsafety.gov.au/product-safety-laws/compliance-surveillance/responsible-sourcing-of-products
- Product testing for consumer goods
www.productsafety.gov.au/product-safety-laws/compliance-surveillance/product-testing