



August 19, 2022

Ms. Joan Lawrence, ASTM F15.22 Subcommittee Chair
Mr. Al Kaufman, ASTM F15.22 Task Group Chair
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Ms. Lawrence and Mr. Kaufman:

CPSC staff¹ is aware of an increasing number of incidents involving children gaining access to button and coin cell batteries in battery-operated toys. Specifically, staff is aware of 301 nonfatal incidents of children and young adults² receiving treatment related to access to button-cell batteries or other types of batteries from 1/1/2011 to 12/31/2021, as reported in the National Electronic Injury Surveillance System (NEISS). Of the 301 NEISS incidents, 210 were reported to have involved battery ingestion, 6 involved batteries found in a child's mouth, 5 found in a child's nostril, and 1 in a child's ear canal.

Staff is aware of an additional 27 incidents, including 26 nonfatal incidents³ and one fatal incident, occurring from 1/1/2016 to 12/31/2021, as reported in the Consumer Product Safety Risk Management System (CPSRMS). Of the 27 CPSRMS incidents, 15 were reported to have involved ingestion.

Staff has attached spreadsheets of this incident data regarding unintended access to batteries in battery-operated toy products.

CPSC staff requests that the toy safety F15.22 subcommittee review the data and develop more stringent performance requirements to address these incidents in the next few months. The voluntary standard, *UL 4200A Products Incorporating Button or Coin Cell Batteries of Lithium Technologies*, includes performance requirements that aim to address the hazard of unintended access to button and coin cell batteries and may represent a good approach to needed requirements. Separately, CPSC staff is reviewing the recently enacted Reese's Law⁴ and evaluating implementation

¹ The views expressed in this letter are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views, of the Commission.

² This includes one 19-year-old, one 18-year-old, and three 15-year-olds.

³ This includes one 25-year-old developmentally disabled adult.

⁴ [Text - H.R.5313 - 117th Congress \(2021-2022\): Reese's Law | Congress.gov | Library of Congress](#)



United States
Consumer Product Safety Commission

options as directed therein. If you have any questions, or need additional information about any of these matters, you can contact me at: bmordecai@cpsc.gov, or (301) 987-2506.

Sincerely,

Benjamin Mordecai

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Cc: Molly Lynyak, ASTM F15 Staff Manager
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Enclosure(s):