

**LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES**

SUBJECT: Underwriters Laboratories Standards and Engagement (ULSE) meeting of Technical Committee (TC) 4200, Child Protection Features in Consumer Products

PRODUCT: Consumer Products Containing Button Cell or Coin Batteries

DATE OF MEETING: March 3, 2023

PLACE OF MEETING: Teleconference

LOG ENTRY SOURCE: Daniel Taxier (ESMC)

COMMISSION ATTENDEES: Daniel Taxier (ESMC), Douglas Lee (EXHR), Mary House (OGC)

NON-COMMISSION ATTENDEES: Contact ULSE for attendee list.

SUMMARY OF MEETING:

This Technical Committee meeting was held for the following purposes:

1. To ensure members have an awareness of Reese's Law, to address the button cell or coin battery ingestion hazard, and CPSC's Notice of Proposed Rulemaking (NPR) addressing Section 2, with performance and labeling requirements for button cell or coin batteries and consumer products containing such batteries;
2. To consider what actions to take as a result of Reese's Law and the NPR with respect to UL 4200A, Products Incorporating Button Cell or Coin Batteries of Lithium Technologies;

The meeting host reviewed sections of the NPR where a requirement in UL 4200A was described as inadequate, or where the standard did not include a requirement addressing a particular hazard. The host treated these sections of the NPR as proposals to change UL 4200A. Throughout the meeting, committee members and other participants discussed context for the original requirement and the merits of the proposed requirements in the NPR. CPSC staff addressed questions related to the proposed rule. The discussion included the following topics:

- Whether it would be reasonable to change the scope to include button cell or coin batteries of non-lithium technology;
- The proposed drop test requirements may not be appropriate for larger devices containing button cell or coin batteries;
 - Staff pointed out that in the NPR briefing package, staff described the lack of clear delineation between hand-held and portable devices. Members of the Technical Committee agreed that this could be further clarified.

- Whether tests from ASTM F963, Standard Consumer Safety Specification for Toy Safety, should be added;
 - One participant said that UL 4200A was not intended to address electric toys, which is why the requirements were not included; but the Commission could find the tests to be reasonable to address certain child behaviors.
- The Technical Committee had a broad discussion on the proposed warnings;
 - A task group member noted that many of the proposed general battery safety statements are addressed by other standards, but there may be some product areas where general battery safety is not addressed by a voluntary standard.
 - Staff commented that the proposed requirement for manufacturers to place warnings online (at point of sale) is proposed under 27(e) authority for performance and technical data at point of sale.
 - Staff considered space limitations in the labeling requirements, and welcomed comments.
- Staff encouraged participants to leave public comments on the NPR.

At the end of the meeting, the Technical Committee agreed to form a task group to develop draft revisions to UL 4200A for the Committee's consideration. Staff agreed to participate on the task group. The proposed timeline includes an initial presentation of work to the Technical Committee in early April, an initial ballot with votes and comments reviewed in early June, and a revised published standard by early August (depending on ballot results).

The first task group meeting is expected to take place the week of March 6, with the final date and time to be determined.