

Toys Powered by Button and Coin Batteries – Recommendations

Updated: June 2023

Superseding: May 2022

Notable changes between this version and the superseded one

- Recommended actions updated to reflect the current point in time
- Further explanations added on compliance management
- Restructured to improve clarity

1. Introduction

This document provides information and recommendations on complying with requirements for toys supplied to Australia that are powered by button or coin batteries. It only considers requirements that are relevant to the button or coin battery so suppliers must also consider any other requirements that may be applicable to the product, e.g., migration of certain elements, mechanical and physical properties, etc.

The document does not intend to restate the requirements but does provide recommendations on assessing products for conformity. It also provides labelling suggestions that are expected to conform to all specified requirements for different situations.

2. Requirements

As of June 2023, the following regulations and standards provide requirements for toys powered by button or coin batteries:

- **AS/NZS 62115:2018 – Electrical Safety of toys**
This is the voluntary standard for the electrical safety of toys but is made mandatory by reference to AS/NZS 3820 in States where the legislation for electrical safety covers all voltages.

The standard is identical to IEC 62115:2017 and equivalent to EN 62115:2020 which is harmonised to the European Toy Safety Directive and so mandatory in that market.

The standard includes requirements for warnings and information on the packaging and in the instructions of toys powered by button and coin batteries. It also includes requirements intended to limit the access by children to these batteries.

- **Consumer Goods (Products Containing Button/Coin Batteries) Safety Standard 2020**
This regulation was introduced by the ACCC on 22nd December 2020 with an 18-month transition period until June 2022.

The regulation includes requirements intended to limit the access by children to the specified batteries from products that are powered by them.

- **Consumer Goods (Button/Coin Batteries) Safety Standard 2020**
This regulation was introduced by the ACCC on 22nd December 2020 with an 18-month transition period until June 2023.

The regulation includes requirements intended to limit the access by children to the specified batteries from packaging that includes them.

This includes where batteries are supplied with product but not installed in it.

- **Consumer Goods (Products Containing Button/Coin Batteries) Information Standard 2020**

This regulation was introduced by the ACCC on 22nd December 2020 with an 18-month transition period.

The regulation specifies the warnings and information to be provided on the packaging and in instructions for products that are powered by the specified batteries.

The regulation includes recommendations for markings that would be considered good practise but are not mandatory.

- **Consumer Goods (Button/Coin Batteries) Information Standard 2020**

This regulation was introduced by the ACCC on 22nd December 2020, with an 18-month transition period.

The regulation specifies the warnings and information to be provided on the packaging of batteries and on the batteries themselves.

This includes where batteries are supplied with products whether installed or not.

The regulation includes recommendations for markings that would be considered good practise but are not mandatory.

3. **Recommended Actions**

It is a breach of the regulations to sell any product that does not conform with them. (Note that this includes the requirement to have a test report showing conformity with the mandatory safety standards).

The regulations have been drafted to allow flexibility and recognise the differences between different product groups and battery types. However, this has introduced some complexity for suppliers in understanding whether or not products are compliant and also in knowing which options to select. Complexity is further increased by the fact of having four different regulations, each with their own options and coverage. We therefore recommend the following:

- **Compliance Approach**

Suppliers should treat these products as high risk for both safety and conformity and ensure that there is a full review of each sku by a knowledgeable person to ensure conformity with each applicable regulation in an appropriate manner. It is important to take extra care with these products, e.g., so that they are further reviewed, even for minor changes to ensure that the product continues to conform in all respects.

- **Specific Solutions for Specific Products**

There are many different situations between replaceable, non-replaceable, button, coin and categories of product. Suppliers should not attempt to find a 'one size fits all' solution. Instead, they should review the characteristics of each product and ensure conformity accordingly.

- **Help Vendors to Understand**

The requirements are, to some extent, unique to Australia, e.g., other jurisdictions do not require warnings for products where the batteries are not replaceable or accessible, and this may lead to push back by international vendors. It is important to work with vendors to help them understand the requirements and that they are not optional for us.

- **Managing Laboratories**

Laboratories are accredited for testing to national and international standards. Where a regulation references a national or international standards, laboratory tests should be able to be relied on to confirm conformity with the regulation. Laboratories are less likely to be reliable for regulations that do reference these standards.

It is important to be familiar with the requirements and ensure that the results of any testing make sense and agree with your own understanding where possible.

- **Testing to the Mandatory Safety Standard is Mandatory**

The mandatory safety standards require that products be tested for conformity. This is unusual for our regulations as it is normally enough just to conform with the safety requirements themselves, i.e., so long as you comply with the requirements, there would be no penalty for not testing. In this case, it is a breach of the regulation just to not have a test report, even if the product complies with the specified requirements.

Note that for toys in particular, it is important to specify testing in accordance with the mandatory standard and not to rely on tests to the referenced standards of AS/NZS ISO 8124.1 and AS/NZS 62115. It is possible that products complying with these tests individually, may not comply with the way that they are combined in the mandatory standard.

The mandatory information standards do not have this requirement for testing, and it is easily possible for a knowledgeable person to create the required warnings for different situations and / or to review warnings for conformity.

- **Button vs Coin Batteries**

It is important to be aware of whether your product is powered by button or coin batteries. Coin batteries are those of lithium chemistry. They have a nominal voltage of 3 V and are typically greater than 15 mm in diameter. Button batteries may be alkaline or some other non-lithium chemistry. They have a nominal voltage of 1.5 V and are typically less than 15mm in diameter.

Accessible coin batteries are a much greater risk than accessible button batteries (due to the size and voltage characteristics) and certain requirements are different because of this. It would be a breach of the regulations to have the warning for button batteries with a product that is powered by coin batteries, and it would be overstating the risk to have the warning for coin batteries with a product that is powered by a button battery.

- **Mandatory Requirements vs Voluntary**

Products must comply with all relevant mandatory requirements as a minimum. AS/NZS 62115 could be considered a lower priority, but it is still important to confirm conformity with it.

- **Options for Labelling**

The regulations allow flexibility and suppliers may have restraints that suggest complying in a certain way, e.g., those using global multi-lingual packaging would probably not choose to add anything other than the required symbol on the front panel of packaging, however, those needing only a single language may choose to add the symbol and text required by 62115 to the front panel.

Where restrictions permit, e.g., product customised for Australia, then the additional recommendations in the information standards should be considered.

Note that the requirements in the regulation are not aligned with those in AS/NZS 62115, but it is possible to conform with both sets of requirements.

- **Marking on Batteries**

It is important to note that the information standard for button and coin batteries includes a requirement that all button or coin batteries with a diameter of 20mm or greater are marked with a symbol to indicate 'Keep out of reach of children'. This requirement applies to batteries installed in or provided with products as well as to batteries supplied separately.

- **Options for Safety**

The mandatory safety standard allows suppliers the choice of different standards for conformity. However, It is recommended that suppliers of toys follow the product-specific tests for toys and that suppliers of other products follow the most relevant product specific standards. Note that using the non-product-specific standards may impose more onerous conditions on the product, e.g. the requirement for fasteners to be captive applies to products using the non-product-specific requirements but wouldn't apply to products using the Audio Video and Electronic Apparatus standards.

It is not recommended to supply batteries that are not installed in the toy, but if this is done, it is important to confirm that they are contained in a way to conform to the relevant requirements in the safety standard for button or coin batteries.

4. **Labelling Suggestions for Specific Scenarios**

There are many different scenarios that may arise depending on the distribution of the product, whether the product is packaged, has instructions, the battery is replaceable, etc. As such, the suggestions below are indicative only. If you would like a recommendation for a more specific scenario, please contact us at compliance@austoy.com.au.

In the suggestions below text in **Orange** should be considered optional.

We have shown the symbols in their recommended colours but believe that it is ok to vary the colour of symbols and text to improve visibility or fit production restrictions, e.g., where the instructions are only printed in 1 colour.

1. **Coin Batteries**

Every coin battery should be marked with a symbol meaning 'Keep out of reach of children' that is 6 mm or more in diameter. See below for an acceptable example.





These are normally engraved onto the surface of the battery.

Note: The regulation only requires this on coin batteries that are 20 mm or more in diameter.

2. **Instructions (or packaging if sold without instructions, or tag or sticker if sold without packaging or instructions)**

a. **Batteries intended to be replaced.**

i. Coin Battery

WARNING!



Contains Coin Battery

Coin batteries are hazardous and can cause severe or fatal injuries in as little as two hours if swallowed or placed inside any part of the body. Keep batteries away from children whether new or used. Dispose of used batteries immediately.

If you think that batteries might have been swallowed or placed inside any part of the body, seek immediate medical attention.

In Australia, call the 24-hour Poisons Information Centre on 13 11 26 for fast, expert advice

ii. Button Battery

WARNING!

Contains Button Battery

Button batteries are hazardous and can cause serious injuries if swallowed or placed inside any part of the body. Keep batteries away from children whether new or used. Dispose of used batteries immediately.



If you think that batteries might have been swallowed or placed inside any part of the body, seek immediate medical attention.

In Australia, call the 24-hour Poisons Information Centre on 13 11 26 for fast, expert advice

b. Batteries not intended to be replaced.

Note: This recommendation includes text to advise not to attempt to access the battery. This text is not required by the regulation, but is added to make sense of having a warning in a product where the battery is not intended to be accessible

i. Coin Battery

WARNING!

Contains Non-replaceable Coin Battery



Coin batteries are hazardous and can cause severe or fatal injuries in as little as two hours if swallowed or placed inside any part of the body. Do not attempt to access the battery – *(Add instruction on what to do when the battery is expired)*

Keep batteries away from children whether new or used.

If you think that batteries might have been swallowed or placed inside any part of the body, seek immediate medical attention.

In Australia, call the 24-hour Poisons Information Centre on 13 11 26 for fast, expert advice

ii. Button Battery

WARNING!

Contains Non-replaceable Button Battery

Button batteries are hazardous and can cause serious injuries if swallowed or placed inside any part of the body. Do not attempt to access the battery – *(Add instruction on what to do when the battery is expired)*

Keep batteries away from children whether new or used.

If you think that batteries might have been swallowed or placed inside any part of the body, seek immediate medical attention.

In Australia, call the 24-hour Poisons Information Centre on 13 11 26 for fast, expert advice




3. Packaging (Front of Pack)

a. Batteries intended to be replaced.




Note 1: The text specified by 62115 has been adjusted to include the 'placed inside any part of the body' concept contained in the regulation.

Note 2: The symbols alone are sufficient for the regulation, but the text is considered to provide more meaning in Australia. In case just the symbols are used, then 62115 would require the 'read operators manual symbol as well'

i. Coin Battery

 		<p>WARNING!</p> <p>Contains Coin Battery</p> <p>Hazardous if swallowed or placed inside any part of the body - See Instructions</p>
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ii. Button Battery

 		<p>WARNING!</p> <p>Contains Button Battery</p> <p>Hazardous if swallowed or placed inside any part of the body - See Instructions</p>
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b. Batteries not intended to be replaced.

No requirement for products with instructions (which would need the warning recommended in 2.b. above).

Products without instructions will need the warning recommended in 3.a.