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Brussels, 12 July 2024,

Mrs Pinuccia Contino  
Head of Unit JUST.B.4 Product Safety and Rapid Alert System  
European Commission  
Directorate-General for Justice and Consumers

Dear Mrs Contino,

The members of the European Portable Battery Association are committed to protecting children from the dangers associated with ingestion of lithium coin cell batteries with a diameter of 16 mm or more. In addition to ensuring devices are required to possess safe battery compartments, new lithium coin cell batteries should only be sold in child resistant packaging.

There are several standards of measuring the child resistant qualities of battery packaging. The first is the test set forth in standard **EN 862:2016**, adopted by the European Committee for Standardization (CEN) on 27 May 2016. This standard sets forth a testing protocol mandating that 200 children of specific ages are provided with packaging and told to try to remove a fake battery from the packaging. EN 862 has been the industry standard to which some EPBA members have complied for over twenty years.

EN 862 has been adopted in slightly modified forms around the world. The United States' **Poison Prevention Packaging Act**, applicable to coin cell batteries after the implementation of Reese's Law in 2023, is nearly identical. **ISO 28862:2018** sets forth an identical test methodology as EN 862, as does the Australian standard **AS 5808—2009. PAS 7055**, the UK voluntary standard, holds that compliance with EN 862 is sufficient for compliance with PAS 7055.

Similarly, battery packaging compliant with EN 862 is automatically compliant with **IEC 60086-4:2019** as well. In Annex E, the latter also sets forth an alternative test of child resistance that can be utilised at the manufacturer's choice, and several EPBA members have chosen this as their method of testing packaging for child resistance. The IEC Annex E test requires that ten packages be tested ***by an instructed adult person or alternatively***, on machines attempting to replicate how children would twist and tear at packaging.

***The members of the European Portable Battery Association call upon the European Commission and other regulators to endorse either EN 862 or IEC 60086-4:2019 throughout the EU via the General Product Safety Directive or other legislation. Such a step will significantly lower the risk of children removing and ingesting lithium coin cell batteries from packaging.***

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For more information on how to protect children from coin cell ingestion, please visit [Button Battery Ingestion | EPBA Europe](#)

Best regards,

A handwritten signature in black ink, appearing to read 'K. Rejent', written in a cursive style.

Kevin Rejent  
EPBA Chairman