



**Asia-Pacific
Economic Cooperation**

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Product Safety Regulations

Submitted by: Consumer Electronics Association



**Joint Regulatory Advisory Committee on
Electrical and Electronic Equipment Meeting
with Industry
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CEA[®]

Consumer Electronics Association

www.CE.org

Product Safety Regulations

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Consumer Electronics Association

- Over 2,000 member companies
- CEA also owns and produces the International CES
- CEA leads technology manufacturers in fostering CE industry growth by developing industry standards



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Overview

- CPSIA – Purpose and Effect on CE/IT Products and Services
- Industry Positions on CPSIA
- Lessons Learned from CPSIA Implementation
- Case study for consideration: Button Battery Ingestion



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Consumer Product Safety Improvement Act of 2008 (HR4040)

- Signed by the President on August 14, 2008.
- The law includes:
 - new limits for lead in children’s products;
 - mandatory third party testing for children’s products;
 - Certification requirements for all products subject to CPSC rules
 - tracking labels and product registration cards for children's products;
 - whistleblower protection and increased civil penalties.



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Industry Positions on CPSIA

- **Certification Requirements**

- Based upon industry concerns, the CPSC implemented electronic filing of certificates, rather than the previously suggested system of paper filings.
- The CPSC clarified its rules to prevent multiple certificates from being generated by manufacturers, importers, and private labelers of the same product.



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Industry Positions on CPSIA

- **Lead Content Limits**

- The CPSIA excludes electronics from meeting lead content limits.
- However, CPSC staff are still struggling with implementation of lead content limits due to the complicated nature of testing. The legislation did not provide staff or industry with enough time for implementation.



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Industry Positions on CPSIA

- **Definition of Children's Product**

- In June 2009, CEA and ITI submitted an interpretation of whether or not a device is a “Children's Product” under the CPSIA.
- Based upon industry evaluation, most electronic devices are not considered children's products as these products are intended for general use and not specifically intended for use by children under 12 years old.



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CPSC Definition of a Children's Product

Definition of a Children's Product

- In August 2010, the CPSC issued a Final Interpretive Rule regarding the definition of a Children's Product.
- The CPSC rule agreed with the industry interpretation that most electronics devices, including game consoles, computers, televisions and DVD players were general use products.



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Lessons Learned from CPSIA Implementation

- Consider electronic filing whenever possible.
- Provide industry with enough time to implement regulations.
- Consider that different product categories may require different regulation – electronics and toys pose different risks.



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Case Study: Button Cell Batteries

- In March 2011, consumer advocates and industry representatives met with the CPSC about the hazard of button cell battery ingestion.
- Consumer advocates wish to limit accessibility of the battery to children. They suggest the requirement of the use of a tool to access the battery compartment.
- Industry has been working toward a solution since April 2010. Industry believes that the tool requirement would be prescriptive and limit innovation. They have suggested an alternate proposal.



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Button Cell Battery

- 20mm Lithium Ion



- Can be swallowed by children and lodge in the esophagus, causing injury or death

Products

- Button cell batteries are used in a variety of products, including:
 - Audio Greeting Cards
 - Remote Controls (for ceiling fans, garage doors, DVD players, audio players, etc.)
 - Scales (bathroom and kitchen)
 - Calculators
 - And more



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UL 60065

- *Audio, Video and Similar Electronic Apparatus – Safety Requirements*
- Since learning of the problem with button cell battery ingestion in April 2010, CEA members worked to develop a proposal to revised UL 60065.
- In January 2011, CEA submitted a proposal to revise UL 60065 requirements for products using button batteries.
- This proposal called for the requirement of the use of a tool or advanced mechanical testing.



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UL 60065

- The comment period for the proposal closed on March 16, 2011.
- Since then, the CEA group that developed the proposal has been meeting to address comments received.
- Most products using button cell batteries are not children's products, and design features need to be considered for all constituencies (including those with disabilities and the elderly).
- The CEA group has developed stronger warning language, agreed to a product marking scheme and has added additional testing to limit exposure to children.



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CEA Position

- CEA feels that allowing flexibility in design is important for continued innovation. CEA is against any prescriptive solution that would inhibit innovation.
- CEA believes that the standards-setting process should be completed. We do not wish to see an interim, knee-jerk reaction solution put into place.



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Consumer Education

- CEA believes that consumer education is key to resolving this problem.
- Any standards solution will not affect products already in homes.
- CEA is dedicated to educating consumers, retailers and manufacturers about the safe use of consumer electronics.



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CPSC Response

- CPSC has applauded CEA for its efforts in revising the standard, and has supplied its own comments on the proposal.
- CPSC staff has indicated that they would prefer a voluntary industry standard approach than a regulatory approach.
- CPSC issued a press release regarding the hazard of button cell battery ingestion, beginning a consumer education effort.



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