



December 17, 2024

The Honorable Alexander Hoehn-Saric, Chairman
The Honorable Peter Feldman, Commissioner
The Honorable Richard Trumka, Jr., Commissioner
The Honorable Mary Boyle, Commissioner
The Honorable Douglas Dziak, Commissioner
U.S. Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Dear Chairman Hoehn-Saric and Commissioners Feldman, Trumka, Boyle, and Dziak:

As you may know, Consumer Reports (CR), the independent, nonprofit, and nonpartisan member organization, previously joined consumer, medical, and public health partner organizations in submitting joint comments to the CPSC on its notice of proposed rulemaking to add performance and labeling requirements for battery-operated toys containing button cell or coin cell batteries.¹ Today, CR writes to provide additional findings from a recent evaluation we conducted that further supports these proposed requirements.²

Recently, CR purchased and evaluated the packaging, labeling, and construction of 31 consumer products, including 15 toys, that contained button cell batteries. We found that almost one in three of the products, including toys marketed for children and toddlers, had dangerously accessible button batteries, and many more lacked clear warning labels about the severe health hazards these batteries pose.

When evaluating the construction of the products, our technical experts assessed whether the samples required the application of two independent and simultaneous movements to open the battery compartment. We found that button cell and coin cell batteries in five of the 15 toys were easily accessible.

Specifically, we found that LED light-up gloves by COTRUERE had an easily accessible battery compartment that did not require any tools or two independent and simultaneous movements to open. In addition, CR's technical experts found a light-up fidget spinner bracelet made by a company called Maegawa, a light-up ring party favor by Wakestar, light up plastic tubes by Kannove, and LED light up finger lights by COKOKA that were easily broken with a small amount of force and without the use of any tools, leaving batteries exposed and accessible. These results indicate that some of these products may also break fairly easily if they were dropped on the floor, exposing their batteries.

Exposure to button cell or coin cell batteries from unsecured or easily accessible battery compartments on toys presents a risk of serious injury and death to children. The results of our marketplace evaluation underscore the need for swift finalization and implementation of the CPSC’s proposed safety standard for toys containing button cell or coin cell batteries. We urge the agency to finalize the proposed requirements expeditiously.

Please do not hesitate to reach out with any questions.

Sincerely,



Oriene Shin
Manager, Safety Advocacy



Gabe Knight
Senior Policy Analyst

cc: Austin Schlick, Alberta Mills, Daniel R. Vice

¹ Regulations.gov, “Comment from AAP, CFA, CR, Kids In Danger, National Center for Health Research, U.S. PIRG,” Document no. CPSC-2024-0023-0009, (Nov. 14, 2024) (online at: www.regulations.gov/comment/CPSC-2024-0023-0044).

² Consumer Reports, “One-third of toys and household items with button-sized batteries CR tested pose a hazard to children,” (Dec. 17, 2024) (online at: www.consumerreports.org/electronics-computers/batteries/button-batteries-in-toys-home-items-pose-hazard-to-children-a8831148288/).