

Dear Director, Button Battery Taskforce
Consumer Product Safety Branch
Australian Competition & Consumer Commission

My name is Katsumi Kojima, from Battery Association of Japan (BAJ).

The Main Tasks of the BAJ is Standardization activities of battery specifications.

The BAJ prepares drafts to establish and revise the Japanese Industrial Standard (JIS) for batteries. Also, the BAJ participates in the TC21, the SC21A and the TC35 meetings as a member of the International Electrotechnical Commission (IEC), an international standards council, and works to promote IEC standards. Furthermore, the BAJ, as Secretary of the Commission, supervises the TC35 meetings, and acts as the convener of the SC21A working group.

We are very interested in "Button Battery Safety Issues Paper (August 2019)" and let me submit comments as follows.

■ Comment ①

IEC TC35 and its participant, Japan analyze accidents in the market and are in the progress of taking priority measures to address button battery safety based on severe cases including death. IEC 60086-4 ED5 was published in April this year after taking measures for batteries with the size of $\Phi 16\text{mm}$ or more that are widely distributed in the market and easily get stuck in the children's oesophagus, specifically lithium coin primary batteries (CR batteries). We recognize the need to improve button battery and to take measure for aqueous button batteries as well. We plan to develop IEC 60086-4 ED6 and IEC 60086-5 ED5 standards under international consultation. We welcome Australia's active participation in IEC TC35 activities toward the elimination of accidental ingestion case by children.

■ Comment ②

Proposal for changing the description for IEC 60086-4 ED5 on Page 33 in Button Battery Safety Issues Paper.

★ IEC 60086-4 ED5 (2019) Proposal for changing the description ★

This standard is the only international standard for the safety of lithium battery products and provides the followings to prevent accidental ingestion by children :

- The example of warning text explaining the hazards of ingesting lithium batteries
- A recommended Pictogram to warn parents to keep products out of reach of children
- Test methods for child resistant packaging

and require the followings:

- Caution for ingestion of swallowable batteries is required
- Lithium coin primary batteries that are intended for direct sale in consumer-replaceable applications and have a diameter of 16 mm or more shall be packaged in child resistant packaging
- Safety sign is required on the body of $\phi 20\text{ mm}$ or more lithium coin primary batteries
- Battery compartment closures should be designed to prevent access by children

■ Comment ③

In Clause 12 "Voluntary international standards", there are four standards: IEC 60086-4 2019 as an international standard, ANSI C18.3M and ASTM F963-11 as US national standard, and UL 4200A as a private standard.

However the only international standard is IEC 60086-4 2019 of these four.

At the same time as changing the title to Relevant Voluntary Standards, it is suggested that IEC 60086-4 2019 be listed first.

Furthermore, IEC 62115:2017: Electric toys- Safety and IEC 62368-1: 2018: Audio/video, information and communication technology equipment- Part 1: Safety requirements also include requirements for preventing accidental ingestion of button/ coin batteries.

Therefore, it is suggested that these two standards be listed as international standards.

Thanks and Best Regards,
Katsumi Kojima