



CONSUMER PRODUCT SAFETY COMMISSION

[Docket No. CPSC-2023-0004]

Agency Information Collection Activities; Extension of Collection; Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries

AGENCY: Consumer Product Safety Commission.

ACTION: Notice of information collection; request for comment.

SUMMARY: As required by the Paperwork Reduction Act of 1995 (PRA), the Consumer Product Safety Commission (CPSC or Commission) announces that the Commission has submitted to the Office of Management and Budget (OMB) a request for extension of approval of information collection requirements associated with the Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries. OMB previously approved the collection of information under control number 3041-0195. OMB's approval will expire on October 31, 2026. On June 15, 2026, CPSC published a notice in the *Federal Register* to announce the agency's intention to seek extension of approval of the collection of information. The Commission received three public comments. By publication of this notice, the Commission announces that CPSC has submitted to OMB a request for extension of approval of that collection of information.

DATES: Submit comments on the collection of information by [INSERT DATE 30 DAYS AFTER DATE OF PUBLICATION IN THE *FEDERAL REGISTER*].

ADDRESSES: Submit comments about this request by email: OIRA_submission@omb.eop.gov or fax: 202-395-3888. Comments by mail should be sent to the Office of Information and Regulatory Affairs, Attn: OMB Desk Officer for the CPSC, Office of Management and Budget, Room 10235, 725 17th Street NW, Washington, DC 20503. Written comments that are sent to OMB also should be submitted electronically at <http://www.regulations.gov>, under Docket No. CPSC-2023-0004.

FOR FURTHER INFORMATION CONTACT: Cynthia Gillham, Consumer Product Safety Commission, 441 G Street NW, Washington, D.C. 20548; (301) 504-7791, or by e-mail to: pra@cpsc.gov.

SUPPLEMENTARY INFORMATION: CPSC seeks to renew the following currently approved collection of information:

Title: Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries.

OMB Number: 3041-0195.

Type of Review: Renewal of collection.

Frequency of Response: On occasion.

Affected Public: Manufacturers and importers of packages of button cell and coin batteries; and manufacturers and importers of non-children's products that contain or are designed to use button cell or coin batteries.

General Description of Collection: Based on the requirements in Reese's Law, 15 U.S.C. 2056e(a) and (b), the Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries, 16 CFR part 1263, prescribes performance and labeling requirements for child-resistant battery compartments on children's and non-children's consumer products that contain or are designed to use button cell or coin batteries. These performance and labeling requirements are intended to reduce or eliminate injuries and deaths associated with children 6 years old and younger ingesting these batteries. The labeling requirements include warning labels for packaging of consumer products containing button cell or coin batteries and for any literature, such as instructions or user manuals, accompanying these consumer products. The standard also includes warning label requirements for packaging of button cell or coin batteries, including button cell or coin batteries packaged separately with a consumer product.

Estimated Number of Respondents: CPSC estimates that there are 15,363 entities that will respond to the collection annually.

Estimated Time per Response: CPSC estimates that on average each entity will respond three times per year. While the time per response will vary depending on the business and their practices, CPSC estimates two hours for labeling and two hours for recordkeeping, on average.

Total Estimated Annual Burden: The total estimated burden of the collection is 184,356 hours (4 hours x 3 x 15,363 = 184,356), annually.

Total Estimated Annual Cost to Respondents: The hourly compensation for all private industry workers in goods-producing industries is \$48.97 per hour (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” total compensation for private industry workers in goods producing industries, December 2025:

https://www.bls.gov/news.release/archives/ecec_03202026.htm). At this rate, the annualized cost the total estimated annual cost of the collection of information is approximately \$9 million annually (184,356 hours × \$48.97 = \$9,027,913.32).

Response to Public Comments:

CPSC received three public comments on its proposed extension of this information collection. One out of scope comment, addressing the requirements of the final rule and of the relevant voluntary standards, was submitted by the People’s Republic of China, pursuant to the Article 2.9.4 of the WTO/TBT Agreement. The other two comments, submitted by the Information Technology Industry Council (ITI) and an anonymous commenter, discussed burden estimates for labeling, among other concerns related to out-of-scope issues. Summaries of and responses to these comments are provided below.

Comments:

ITI commented that the burden is underestimated and does not reflect real-world complexity, such as lifecycle documentation (not a one-time effort), global model and packaging complexity, and cross functional coordination. ITI asserted that complying with the labeling requirements takes at least three to four hours per label or more. To address these concerns, ITI

suggested that the Commission allow the use of electronic labeling (e.g., QR code), leading to online manuals on the manufacturer's website.

The anonymous commenter stated that CPSC's burden calculations should reflect "real-world operational reality" to account for creating, verifying, scaling, and managing compliance artwork across packaging and documentation, which the commenter asserted, similar to ITI's comments, takes three to four hours per label.

The anonymous commenter also provided additional requests which include clarifying scope guidance for paperwork filings for 16 CFR part 1263, considering alternative formatting for small surfaces and/or allowing high-contrast monochrome printing on small retail packaging, eliminating "duplicate compliance paths," and streamlining recordkeeping to include e-labeling barcodes. The commenter did not elaborate on the concerns associated with duplicative compliance.

Response:

CPSC adjusts burden estimates upward from 1.25 hours, for both labeling and recordkeeping, based on the information received from the commenters. CPSC adjusts burden estimates to two per response for labeling and two hours for recordkeeping, noting that response times to the collection will vary depending upon the size of the establishment, the number and type of products sold by the firm, and other factors outside of the control of CPSC, such as internal business practices. CPSC notes that burden estimates are annual and that labeling is not typically redesigned on an annual basis, therefore an estimate of two hours per year for labeling is reasonable.

With regard to comments on electronic labeling, the rule requires on-product warnings but does not prohibit additionally providing digital access to the safety statements. However, given that not all consumers have easy access to the internet or sufficient knowledge to use QR codes, the warnings language must be included physically along with the product in order to have the intended effect of providing warnings and safety information to consumers. Reese's

Law requires that warnings be included: on the packaging of button cell or coin batteries and the packaging of consumer products containing such batteries; in any literature that accompanies a consumer product containing button cell or coin batteries; and, as practicable, directly on consumer products containing button cell or coin batteries.

Both UL 4200A-2023, incorporated by reference in 16 CFR 1263.3, and CPSC's requirements at 16 CFR 1263.4 include a table for letter size based on the display area, with smaller letters allowed on small surfaces; and offer alternative means of displaying the warnings when the display area does not allow the full warning. Furthermore, the rule does not prohibit high-contrast monochrome printing; referenced color schemes need to be in color only if the labels are printed in more than one color.

CPSC provides administrative guidance for compliance in many forms, including a business guidance page on its website: <https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Button-Cell-and-Coin-Battery>.

Alberta E. Mills, Secretary
Consumer Product Safety Commission