

### **New mandatory Button/Coin Standard for attention of dealers, agents, auction houses, wholesalers, and parts suppliers**

**\*\*\* This is not legal advice \*\*\***

Dealers are advised that the Australian Government has introduced four mandatory Standards (the Standards) to reduce the risk of death and injury associated with the use of Button and Coin batteries. The new Button/Coin Battery Standard will become mandatory from 22 June 2022. These new mandatory requirements include safety and information standards for products that contain Button/Coin batteries and safety and information standards for Button/Coin batteries themselves.

The four mandatory standards are listed below:

- [Consumer Goods \(Products Containing Button/Coin Batteries\) Safety Standard 2020](#)
- [Consumer Goods \(Products Containing Button/Coin Batteries\) Information Standard 2020](#)
- [Consumer Goods \(Button/Coin Batteries\) Safety Standard 2020](#), and
- [Consumer Goods \(Button/Coin Batteries\) Information Standard 2020](#)

It is important that you make yourself familiar with the Australian Consumer and Competition Commission (ACCC) business guidelines by taking this [link](#).

VACC has been in consultation with the administrators of the new Standards (the ACCC) and requested clarity with several issues regarding procedure.

The new Standards apply to used vehicles, demonstrator, factory owned or wholesale stock. The standard applies to all new and second-hand items first supplied on or after 22 June 2022.

The new Standards **do not** apply to vehicles presented to your service department for servicing or repair.

#### **What are Button/Coin batteries?**

The Standards define a Button/Coin battery as a small, single cell battery with a diameter greater than their height.

The ACCC guidelines advise of a broad range of consumer and household products that contain Button/Coin batteries including, but not limited to, remote controls (television remotes, car keys, garage door openers).

### **The major elements for dealers will be that:**

- For vehicle dealers, this will mean that any electrical devices sold that contain a Button/Coin battery will be required to have warning sticker or tag applied. This will also include the spare keys sold with a key fob with any vehicle (cars, trucks, farm machinery, motorcycles, salvage stock).
- The new Standards apply to used, demonstrator, factory owned or wholesale stock. The standard applies to all new and second-hand items first supplied on or after 22 June 2022.
- For dealer spare parts and other suppliers, this will mean that packaging of Button/Coin batteries is required to be in child resistant packaging and have warnings included on the packaging as mandated under the new Standard.
- Whilst not prescribing the exact wording, the Standards state that the warning must cover the following matters:
  1. an alert word (such as DANGER, WARNING or CAUTION) with the letters of the alert word in upper case.
  2. a statement to the effect that the battery is hazardous and is to be kept away from children (whether the battery is new or used).
  3. if the battery is a lithium Button/Coin battery—a statement to the effect that the battery can cause severe or fatal injuries in 2 hours or less if it is swallowed or placed inside any part of the body.
  4. if the battery is a non-lithium Button/Coin battery—a statement to the effect that the battery can cause serious injuries if it is swallowed or placed inside any part of the body; and
  5. advice to the effect that medical attention should be sought immediately if it is suspected the battery has been swallowed or placed inside any part of the body.

Additionally, the Standards state that contact information for the Australian Poisons Information Centre should also be included.

### **What action should dealers take to comply?**

VACC urges dealers to consult with their manufacturers to ensure that affected current and future deliveries from the factory have the mandated warning labels and other requirements attached to the keys or have warning labels for you to attach prior to supplying a customer with keys or any product that contains a Button/Coin battery. It is also imperative that the manufacturer has made the appropriate long-term arrangements with your dealership network, that will enable you to comply with the new Standards.

It is noted that some manufacturers have begun the process to inform their networks of the new Standards. This is encouraging.

## **Staff drive cars, trading stock, demonstrator stock and vehicles in service departments**

- All staff drive cars, trading and demonstrator vehicles must have a sticker or tag on the key fob and the warning notice placed in the vehicle owner's manual.
- Stickers or tags must be replaced if worn or illegible.
- When a consumer has had a vehicle serviced you should place a sticker or tag on the key fob and in the vehicle owner's manual before returning to the consumer.

It was previously advised that when a consumer has had a vehicle serviced you should place a sticker or tag on the key fob and in the vehicle owner's manual and on the key fob before returning to the consumer. VACC advises that after consultation this morning between VACC and ACCC **this is not** a requirement under the new Standards.


### **What will warning stickers and label look like?**

VACC will produce a limited number of warning labels for members to purchase. Versions of the stickers are displayed below (Sticker A and Sticker B) They are not to scale. Sticker A is to be applied to key fobs . Sticker B is to be inserted to a vehicle owner's manual in the same area where the section where the operation of keys is published.

VACC has reviewed the stickers and can confirm that the warning on the sticker and/or tag conforms with the requirements of Section 10 of the *Consumer Goods (Products Containing Button/Coin Batteries) Information Standard 2020*.

I will advise in a further email on availability of the stickers. There will be a small charge (cost recovery) for members to purchase stickers via VACC [autoistore.com.au](http://autoistore.com.au)

Members can download a copy of the tag in the illustrations below.

Sticker A (or tag) to be attached to key fob (example only)	Sticker B For owner's manual (not actual size, example only)
	

**Please note that Sticker A is close to the actual size of the sticker to be applied to a key fob. You can increase the size if you choose to place a key tag.**

Please note that Sticker B is not the actual size. Sticker B will have an adhesive resin on the rear of the flyer in the same manner as a post-It note. It should be adhered to the owner's manual in the section where the operation of keys is published.

### **Sticker availability**

VACC is working frantically to begun distribution of the stickers by 22 June 2022. They can be ordered by visiting [www.ourautoistore.com.au](http://www.ourautoistore.com.au). I will advise you all of when they are available.

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