

ON REESE'S LAW

Resources and information for dealers and installers

By Greg Matias, Director of Compliance and Validation for Genie



Editor's note:

The following article from Genie's compliance expert Greg Matias addresses some of the important questions we received after publishing our "Reese's Law" story in the fall 2024 issue. Keep reading for more information.

The following Q&A is designed to offer additional guidance on the requirements of Reese's Law and to help dealers and installers ensure that the products they provide to their customers are compliant.

Q: What products need to be Reese's Law compliant?

A: Any consumer product that

includes a coin cell battery must be compliant. That typically includes handheld transmitters and similar accessories. Accessories such as wireless keypads or other controls that use AA or AAA batteries do not fall under Reese's Law.

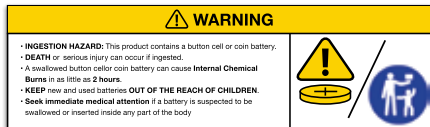
Q: Does Reese's Law apply to commercial products?

A: No, the law only covers consumer products typically intended for residential use.

Q: How do I know if a product is compliant?

A: There are requirements for the construction of the product, warnings in the instructions and packaging, and product marking. Every product that is subject to Reese's Law must be labeled on the packaging with one of the warning symbols shown below.

Products that are subject to Reese's law and do not have the appropriate marking are not compliant. That includes operators that are packaged with accessories that use coin cell batteries.



Q: What if I have old stock of products that are not compliant? Can I still sell it?

A: The Consumer Product Safety Commission (CPSC) Rule states that products produced before the cutoff date of March 19, 2024, are not subject to the law. Evidence of the production date should be documented if a decision is made to sell old stock.

Q: Does the manufacturer provide any documentation to show compliance?

A: Yes; the manufacturer should provide a General Certificate of Conformity (GCC) upon request for any product that complies with the law.

Q: What if I sell coin cell batteries separate from the product?

A: Coin cell batteries sold individually also fall under Reese's Law, although the packaging and labeling requirements are different. You will need to follow these requirements to ensure compliance with Reese's Law.




Q: Has the CPSC taken action against companies that violate Reese's Law?

A: Yes; a notice of violation was recently issued by the CPSC against Apple for not correctly labeling AirTags according to the requirements of the law. A link to the CPSC notification is provided below: [CPSC Secures Agreement with Apple for Enhanced Warnings to Protect Children from Hazards of Battery Ingestion; Apple Takes Action to Address Labeling Violations on AirTags | CPSC.gov](#)

Q: Where can I get more information about Reese's Law?

A: A variety of resources are available from the CPSC and UL about the rules for Reese's Law and the requirements for testing. Refer to the "Reese's Law Resource Center" side bar for additional references and links. ■

REESE'S LAW RESOURCE CENTER

-  Additional guidance from the CPSC for Reese's Law can be found at [Button Cell and Coin Battery FAQs | CPSC.gov](#) and [Button Cell and Coin Battery Business Guidance | CPSC.gov](#)
-  The requirements for a GCC are provided at the CPSC Website: [General Certificate of Conformity | CPSC.gov](#)
-  Additional information about complying with UL 4200A can be found at [UL 4200A Battery Testing and Labeling Services for Reese's Law | UL Solutions](#)

Disclaimer – The contents of this article are intended to address general questions relevant to the door and gate operator industry. They are not intended to be, nor should they be relied on as legal advice or a comprehensive summary of the Reese's Law requirements. Consult an attorney for specific guidance for your specific circumstances.