



HEALTH OFFICERS COUNCIL OF BRITISH COLUMBIA

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Honourable Mark Holland

Minister of Health
House of Commons
Ottawa, Ontario
K1A 0A6

RE: Health Officers Council of British Columbia Support for new federal regulation to address the problem of button battery injury

Dear Minister Holland,

The Health Officers Council (HOC) of British Columbia¹ would like to bring to your attention the urgent need to prevent small battery injury and death particularly among young children in British Columbia and across Canada.

Unintentional digestion of small batteries, also known as 'button batteries', is a frequent means of chemical burn in the gastrointestinal tract causing serious, highly alkaline caustic injury that can result in death. Button battery injuries tend to be more severe and most common among children under the age of five years.² When a child accidentally ingests a button battery, a significant esophageal injury can occur within two hours. As a result, British Columbia recently updated its emergency department protocols for responding to such medical emergencies.³

In British Columbia, the BC Drug and Poison Information Centre receives an average of 52 button battery exposure calls per year.⁴ For Canada, in 2020, Canadian Hospitals Injury

¹ The Health Officers' Council of BC was created in 1947 and currently represents over 120 public health physicians in BC. Its purpose is to advise, assist in development of, and advocate for public policies, programs and services that are directed towards improving and protecting the health of the population, and reducing health inequities.

² BC Drug & Poison Information Centre (2023), Button (disc) battery ingestion/poisoning data (Vancouver: Unpublished data prepared by Jeff Trieu, 1 May 2023).

³ Emergency Care BC (July 2022), Button Battery Ingestion Protocol. Retrieved from: [Button Battery Ingestion Protocol : Emergency Care BC](#)

⁴ BC Drug & Poison Information Centre (2023), Button (disc) battery ingestion/poisoning data (Vancouver: Unpublished data prepared by Jeff Trieu, 1 May 2023).

Reporting and Prevention Program (CHIRPP) reported 125 button battery injuries.⁵ However, consensus is widespread that these numbers underestimate the real burden due to reporting and data capture limitations; CHIRPP only samples a fraction of Canadian Hospitals.

A review of data from the BC Drug & Poison Information Centre reveals that the number of poison centre calls related to button batteries has trended upward over the last decade⁶. The number of emergency room visits related to these types of batteries has also increased over the past 7 years in at least one regional health authority in BC.⁷

Initially developed in the 1950s to power high-end watches, button batteries have been proliferating around the globe and across an ever wider range of consumer products including toys, lights, novelty items such as musical greeting cards, jewelry, calculators, medical devices, hearing aids, flashlights, key remotes, etc. According to Australian researchers doing work in this area, the increased use of light-emitting diode (LED) lights is compounding this problem by contributing to a growing number of relatively low-cost consumer products that use button batteries to power such lights.⁸

Today, button batteries make their way into Canadian households, schools, playgrounds, etc. with no warnings, in many cases without being knowingly purchased, with no labelling and no accountability. These batteries represent the 'perfect storm' as they are manufactured in a complex global marketplace, where low-cost products are made, promoted and marketed but where manufacturers and shippers are insulated from any of their harmful effects.

Of particular concern is the increased availability of the 20 mm sized, lithium 1.2 and greater volt battery which has been associated with almost all button battery deaths worldwide.⁹ Canada is now averaging 1 to 2 such deaths each year according to the Government of Canada Consumer Product Safety Program Annual Surveillance Reports.¹⁰

Yet the problem of button battery injury has many solutions, including childproof battery packaging, the regulation of consumer products that use such batteries requiring more secure battery compartment access (e.g., only accessible with a screwdriver or other tool) and design of the button battery itself including its size, shape, chemical composition and maximum voltage. Such solution-oriented thinking is in alignment with leading injury prevention thinking worldwide where there is almost ubiquitous consensus that reminders and educational campaigns have little to no effect in reducing injury compared to the effect of simply designing out dangers in the

⁵ Government of Canada (2021, November 15), Public advisory: Button batteries pose life-threatening dangers to young children. Retrieved from: [Button batteries pose life-threatening dangers to young children - Canada.ca](#)

⁶ BC Drug & Poison Information Centre (2023), Button (disc) battery ingestion/poisoning data (Vancouver: Unpublished data prepared by Jeff Trieu, 1 May 2023).

⁷ Island Health (2023), Button battery injuries (Victoria: Unpublished data prepared by Population Health Assessment, Surveillance and Epidemiology, 4 July 2023).

⁸ Dr. Ruth Barker, Emergency Paediatrician, Director Queensland Injury Surveillance Unit, personal communication, 14 August 2023.

⁹ John Paull (2021), Button Batteries and Child Deaths: Market Failure of Unsafe Products, *International Journal of Clinical and Experimental Medicine Research*, 5, pp.297 - 303. Retrieved from: [Button Batteries and Child Deaths: Market Failure of Unsafe Products - Archive ouverte HAL](#)

¹⁰ Government of Canada (2022), Consumer Product Safety Program Annual Surveillance Report. Retrieved from: [Consumer Product Safety Program Annual Surveillance Report: 2022 - Canada.ca](#)

first place. The problem of button battery injury is a human-made problem and as such is subject to human-made solutions.

Other regions of the world have recognized the dangers and are actively pursuing solutions. The European Union, Australia and the United States each have regulation in place, or underway, on this issue.¹¹ As there is no similar regulation being implemented by Health Canada, there is a significant risk that Canada, including British Columbia, will become a global 'dumping ground' for button batteries, and the consumer products that use them, that these other regions of the world will not accept because of their respective product safety laws.¹²

While we understand and appreciate that Health Canada has already identified button batteries as a 'hazard of concern' and, under the authority of its General Prohibitions provision, is currently working on a voluntary industry standard, we also believe that such a step is likely to be inadequate given the ongoing and serious injury risk posed to young children by button batteries. We, therefore, ask that the Minister of Health act with greater resolve on the problem of button battery injuries and take steps similar to what leading jurisdictions are doing, or have done, including by mandating, in legislation, childproof button battery packaging, mandating that any device that uses a button battery is childproof by requiring a tool to access the battery compartment and establishing appropriate product warning and recall provisions. Health Canada has a mandate to fully regulate consumer products, in a binding way, that cause harm to people, including young children. Exercising these full legislative powers is the right and necessary thing to do.

Yours sincerely,



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¹¹ Regulation in the European Union is made up of EN 60086 (requires child resistant packaging for coin cells 16mm and larger) and EN 62115 (requires toys to have safe compartment design). Regulation in Australia went into effect on December 21, 2020 and applies to all products that use a button battery and regulate consumer products, battery packaging and warnings and labels. Regulation in the United States began when Reese's Law was passed in August 2022 and mandates that their federal department, Consumer Product Safety Commission, promulgate a consumer product safety standard by October 23, 2023.

¹² Dr. Ruth Barker, Emergency Paediatrician, Director Queensland Injury Surveillance Unit, personal communication, 14 August 2023