



January 22, 2026

Healthy Environments & Consumer Safety Branch
Health Canada
Ottawa, Ontario
K1A 0K9

VIA Email: ccpsa-lcspc@hc-sc.gc.ca

Re: Consultation – assessment for products containing button or coin batteries

Dear Sir/Madam:

On behalf of the Canadian Toy Association and the U.S. Toy Association we are writing in response to Health Canada's consultation notice to add products containing button/coin batteries to Table 2 of the General Prohibition process under the *Canada Consumer Product Safety Act*.

As background, the Canadian Toy Association (CTA) has over 100 members consisting of manufacturers, importers and distributors of toys generating over \$2 billion in Canadian toy sales. Most CTA members are small and medium enterprises operating across Canada. The Toy Association in the U.S. is also a not-for-profit trade association for producers and importers of toys and youth entertainment products sold in North America. It represents over 900 businesses – including toy designers, inventors, manufacturers, importers, retailers, and testing laboratories – that operate and sell toys internationally. The toy sector is a global industry of more than US\$ 90 billion annually, and our members account for more than half this amount. The CTA and The Toy Association work very closely together and safety is our number one priority.

We are pleased to see Health Canada recognize ASTM F963-23 for toys as part of its performance criteria to demonstrate compliance for consumer products containing button/coin batteries. The ASTM F963 toy safety standard is well-recognized internationally as one of the world's premier toy safety standards and its comprehensive requirements have been emulated globally for toys, as well as for several non-toy categories. Its credibility comes, in part, from the consensus process that ensures that multiple stakeholder viewpoints are considered. The standard is also respected because it is driven by solid, validated data and the ASTM F15.22 Subcommittee which manages it is responsive to data supported identified hazards.

Our member companies recognize the importance of continual monitoring of current standards and enhancements in toy safety when risks emerge. While toy standards for button/coin batteries have long been in place and are now in effect for other products, enhanced coordination and alignment of U.S. and Canadian toy standards will only bolster these efforts. Our industry has long advocated for the best coordinated toy safety standards globally that are based on sound science. Avoiding unnecessary divergences in toy standards is a very important objective to ensuring product safety, including for known hazards related to button/coin batteries. It improves compliance and coordinates enforcement amongst regulators, a goal already recognized by Health Canada and the U.S. Consumer Product Safety Commission (CPSC) through their commitment to collaborate on toy safety.

Again, we welcome Health Canada's recognition of ASTM F963 as part of its performance criteria to demonstrate compliance for products that safely contain button/coin batteries. Our member companies remain committed to working with Health Canada to ensure that Canada's product safety regime delivers the intended health and safety benefits to consumers. As Health Canada's proceeds with its risk management efforts for button/coin batteries, please do not hesitate to contact us if you have any questions.

Yours sincerely,



Serge Micheli
Executive Director,
Canadian Toy Association
20 Carlton St. #123,
Toronto, ON M5B 2H5
Email: sm@canadiantoyassociation.ca



Jos Huxley
Senior Vice President, Technical Affairs
The Toy Association
1375 Broadway, Suite 1001
New York, NY 10018
Email: jhuxley@toyassociation.org