

Amazon flagged a button battery. What must your evidence prove?

SOURCE

16 CFR Part 1263
Amazon Account Health

SCOPE

Exact ASIN
Complete sold set

REVIEWED

AUGUST 5, 2026

Verify the exact sold configuration, reconcile the catalog, and choose the route the evidence supports.

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Document control

Version, scope, audience, permanent links, and rights.

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Scope & evidence	Inspect & record	Reconcile & decide	Prepare & submit	Sources & method
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SCOPE This guide addresses a product that may be outside the Amazon button- or coin-battery classification because the exact sold configuration uses another power source or no battery. It does not replace the live ASIN action panel. LIMITATION General U.S. compliance information only. Not legal advice, a CPSC applicability determination, an Amazon decision, product certification, or a guarantee of reinstatement.

The route begins with the product

Physical facts first. Route second.

The route begins with the documented product - not with the platform flag.

01

EXACT SOLD SET

Main unit, remote, controller, accessories, separately packed batteries, and the exact child ASIN.

02

ACTUAL POWER

Every input, compartment, installed cell, hidden backup source, and accepted replacement battery.

03

IDENTITY RECORD

ASIN, model, revision, lot, package, manual, technical record, photographs, and catalog fields.

04

CORRECT ROUTE

Appeal, correct first, comply through the in-scope route, or stop until the configuration is verified.

One defensible chain should connect the product Amazon reviews to the route the evidence supports.

APPEAL

No component contains or is designed to use a covered cell; identity and catalog are consistent.

CORRECT FIRST

The physical product may be outside scope, but listing, manual, images, or version data still conflict.

COMPLY

A component contains or is designed to use a covered coin cell, including a remote or absent-but-required cell.

STOP & VERIFY

The power source, revision, accessory set, or FBA inventory is unknown or mixed.

What this changes in practice

Do not begin with a denial or buy an irrelevant report. First establish the complete configuration, remove factual contradictions, and preserve the record that supports the chosen route.

Is the exact product within Part 1263?

Shape, design, and the complete sold configuration control the screening result.

S02 / OFFICIAL RECORD · ACCESSED AUGUST 5, 2026

BATTERY DEFINITION

"A single cell battery with a diameter greater than the height of the battery."

COVERED PRODUCT

"...containing or designed to use one or more button cell or coin batteries..."

Selected exact language typeset for readability; ellipses indicate omitted text. Apply the complete regulatory text.

16 CFR § 1263.2

CONFIGURATION	SCOPE SIGNAL	VERIFY	NEXT ROUTE
No battery anywhere	Outside Part 1263 if the design does not accept a covered cell.	No hidden RTC, memory, backup cell, remote, controller, or powered accessory.	Reconcile the catalog and build a no-battery record.
AA or AAA	Ordinarily outside the current shape definition.	Exact cell, open compartment, quantity, all accessories, and no second coin cell.	Appeal only after factual catalog conflicts are resolved.
CR2	Typical CR2 geometry is cylindrical, not coin-shaped.	Exact manufacturer/model, dimensions, installation, and other components.	Prove the exact CR2. Do not infer scope from the letters "CR".
CR2032 / designed to use	In scope even when the cell is not supplied in the box.	Compartment geometry, contacts, manual, compatible designation, and product claims.	Use the current in-scope Amazon action.
Built-in LiPo / Li-ion	Geometry controls; chemistry or "rechargeable" does not decide scope.	Cell model, shape, datasheet, location, charging design, and accessories.	Document the exact cell; assess separate lithium obligations.
USB or AC	Outside only if no part contains or is designed for a covered cell.	Wired input, internal backup circuit, remote, accessory, and package contents.	Show the complete wired power path and sold set.
Remote or accessory	The included component can determine the result.	Remote/accessory model, open compartment, installed cell, manual, and package.	Classify the complete configuration - not only the main unit.
Unknown / mixed revisions	Undetermined.	Which revision is offered, pictured, stored at FBA, and covered by the manual.	Stop, segregate versions, and establish one current configuration.

Separate boundaries: the compliant-toy exclusion, zinc-air treatment, and genuine medical-device boundary require their own verified analysis. This matrix is a screening framework, not an official CPSC or Amazon determination.

Inspect the complete sold configuration

Account for every power source the customer receives or the design accepts.

00

Start with one unopened production unit

Use the exact variation and revision now sold. Record package identifier, child ASIN, model, lot or revision mark, and inspection date.

01

Follow every power path in the main unit

External inputs, primary compartments, service areas, memory or backup cells, clocks, displays, and detachable modules.

02

Open every remote and controller

Keep each control beside the main unit. Capture its model mark, closed compartment, open compartment, and installed cell.

03

Inventory every included accessory

Sensors, key fobs, timers, lights, microphones, styluses, wireless triggers, spare modules, replacement parts, and separately packed batteries.

04

Read the customer-facing record

Manual, quick-start guide, packaging, inserts, QR-linked instructions, and replacement-parts material.

05

Compare variations and inventory

Do not borrow evidence across child ASINs. If old and new units can coexist, version control comes before a universal appeal.

The purpose is not to accumulate photographs. It is to eliminate plausible places where a covered cell could exist.

RECORD BEFORE OPENING

- Marketplace and child ASIN
- Seller SKU and title
- Model / part number
- Revision, lot, date code
- Package identifier
- Inspection date

STOP CONDITION

Do not assert one universal configuration while the offered product, FBA stock, photographs, manual, or package can represent different revisions.

Output: one complete sold set

A named ASIN, model, revision, package, component inventory, and power-source map that all other evidence can reference.

Build one product-identity record

Use this sheet to connect the ASIN, physical unit, power source, technical record, and catalog.

01 / CASE IDENTITY

MARKETPLACE		CHILD ASIN	
SELLER SKU		LISTING TITLE	
MODEL		PART NUMBER	
REVISION / LOT		PACKAGE ID	

02 / COMPLETE SOLD SET

03 / POWER-SOURCE MAP

COMPONENT	POWER SOURCE / CELL	MODEL / QUANTITY	LOCATION / FUNCTION

04 / RECORD LINKS

CURRENT MANUAL		TECHNICAL SPEC / BOM	
BATTERY DATASHEET		CATALOG EXPORT / SHOTS	

05 / EVIDENCE-BASED CONCLUSION

Identity test

Every item should answer both questions: **What exact product or component is this?** and **How is it powered?**

Use evidence that proves the disputed fact

Strong evidence is model-specific, contemporaneous, internally consistent, and understandable without guessing.

A / PRODUCT AND POWER EVIDENCE

FACT TO PROVE	STRONG EVIDENCE	WEAK OR MISSING	CONTRADICTION TO RESOLVE
Exact product identity	Contextual photographs linking product, model label, package identifier, and ASIN/variation record.	Generic product image or seller statement.	Different color, model, revision, package, or child ASIN.
No battery in main unit	Exterior sequence plus opened power/service areas, supported by the model-specific electrical specification or BOM.	One front view or "no battery included."	Manual describes a memory cell or package lists a battery.
AA / AAA / CR2 power	Open compartment in product context, legible installed-cell designation, compartment markings, and exact datasheet.	Loose battery photographed away from the product.	Listing says CR2032, compartment is hidden, or datasheet covers another cell.
Remote and accessories	Full kit inventory followed by each accessory label, open compartment, or power input.	Main unit only.	Manual or package includes an omitted remote, sensor, or module.

B / REVISION, CATALOG, AND CONCLUSION

FACT TO PROVE	STRONG EVIDENCE	WEAK OR MISSING	CONTRADICTION TO RESOLVE
Current revision	Change-control record with effective date, lot/date code, production evidence, and current inventory identity.	"The design changed" without dates or identifiers.	Old and new units are mixed or current images show the old remote.
Catalog consistency	Dated frontend/backend record plus before-and-after evidence for factual corrections.	Claim that "the listing is fine."	A+ Content, manual, image, parent data, or sibling still describes a coin-cell product.
Out-of-scope conclusion	Concise cross-reference tying every component and power source to the federal definition and supporting evidence.	General opinion, unrelated SDS, or report with no ASIN/model link.	Product is designed for CR2032 but the conclusion relies only on battery absence.

Control rule: More pages do not cure a missing identity link, an omitted accessory, a stale catalog record, or an unsupported scope conclusion.

Photograph one connected proof sequence

The reviewer should be able to follow one model from the complete set to the exact power source.

Minimum visual frame: Amazon moderator guidance asks for six-sided product and accessory images and, when another battery type is used, a view of the compartment showing that battery. A coherent record usually requires more than six disconnected exterior views.		
01	Full physical product: Show the assembled unit and all included items together, then every relevant exterior side.	☐
02	Model and identity mark: Make the model, part number, revision, lot, and other identifiers readable.	☐
03	Power source in context: Show the AC/USB input or closed battery compartment while enough of the product remains visible.	☐
04	Open compartment: Show contacts, shape, polarity and size markings, and any molded battery designation.	☐
05	Actual power component: Show the installed AA, AAA, or CR2 designation, or model-specific evidence for the built-in system.	☐
06	Remote and accessories: Photograph each item, identity mark, compartment, and power input separately.	☐
07	Retail package: Show all sides, package contents, model, barcode, power claims, and battery statements.	☐
08	Manual or specification: Capture the cover/model identity and the page identifying the power source and components.	☐

SAME PHYSICAL UNIT	CURRENT VARIATION	ORIGINAL PRESERVED	NO DIGITAL ALTERATION
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Make the catalog and product tell one truthful story

Record screenshots and exports before and after every factual correction.

SOURCE	CURRENT STATEMENT	PHYSICAL TRUTH	ACTION / DATE / RETAINED PROOF
Detail page: title, bullets, description			
Backend battery and power fields			
A+ Content, images, and video			
Manual and linked files			
Retail package and inserts			
Parent and sibling ASINs			
Inventory, lots, and revisions			
Compatibility language and replacement claims			

Two records must agree: a catalog correction does not prove the physical design, and physical photographs do not erase contrary catalog data. Correct only inaccurate information; retain and explain truthful compatibility language.

Choose the route from the design

Do not choose from the desired outcome. Choose from the verified configuration and consistent record.

Q1. Does any part of the sold configuration contain or is it designed to use a button or coin battery?

YES

Verify any narrow toy, zinc-air, or medical boundary. If none applies, use the in-scope route.

NO - CONTINUE

Identify the verified alternate power source.

UNKNOWN

Stop and inspect the product, accessories, technical record, and revision.

Q2. Is the actual source verified as no battery, AA, AAA, CR2, LiPo, USB, or AC for every component?

NO / MIXED

Establish one current configuration before asserting scope.

YES - CONTINUE

Test catalog and version consistency.

DESIGN ACCEPTS COIN CELL

Battery absence does not create an out-of-scope case.

Q3. Do the listing, backend fields, images, package, manual, and current inventory identify the same power system and revision?

NO

Preserve the old record, correct factual conflicts, and segregate materially different versions.

YES - CONTINUE

Check whether the identity-linked record is complete.

Q4. Is every claim linked to the exact ASIN, model, revision, component, and power source?

FIRST COMPLETE RECORD

Submit one coherent misclassification appeal through the live Account Health action.

PREVIOUSLY REJECTED

Diagnose the delta. Add only evidence that resolves a named gap or contradiction.

Output: the next action and retained record - not a guarantee of approval or reinstatement.

This decision route is a screening aid. The exact product, current official rules, and ASIN-specific Amazon action control.

Where the correct route changes

Compare the physical facts, catalog problem, and evidence before choosing an appeal.

DECISION FIELD	1 / AC MAIN UNIT + AAA REMOTE	2 / CURRENT CR2 OR AAA + LEGACY CR2032 RECORD	3 / CR2032 DESIGN, BATTERY ABSENT
Verified configuration	Main unit uses AC; included remote uses AAA; no backup or covered cell elsewhere.	Current unit uses CR2 or AAA, but old manual, image, attribute, or revision describes CR2032.	Compartment and instructions accept CR2032, even if the cell is sold separately.
Scope result	Likely outside Part 1263 if the complete sold set is verified.	Potentially outside for the current design, but not proven until version and inventory history are controlled.	In scope under the "designed to use" language.
Catalog issue	Generic battery value, omitted remote type, or obsolete coin-cell image.	Legacy content conflicts with current production; old and new units may be mixed.	"CR2032 required, not included" may be truthful. There may be no misclassification.
Evidence needed	Full kit, AC input, main-unit specification, remote model, open AAA compartment, manual, package, and catalog record.	Exact cell evidence, model/revision marks, engineering change, effective date, current manual/package, and lot identity.	Follow the current in-scope request for applicable report, certificate, warnings, images, instructions, or TIC route.
Correct route	Correct inaccurate catalog data, then submit a linked misclassification appeal.	Establish whether a covered version entered commerce; segregate units; explain the transition; then choose the route.	Use the in-scope compliance route or obtain qualified product-specific advice.
Wrong action	Buy a UL 4200A report for a nonexistent coin cell or photograph only the main unit.	Delete history, confuse CR2 with CR2032, or combine evidence from different revisions.	Rely on "battery not included," erase truthful specifications, or ignore the compartment design.

Same Amazon requirement, different correct response: the physical configuration, catalog history, and evidence record decide whether the seller should appeal, correct first, or comply.

Decode the rejection before resubmitting

A repeated message identifies an unresolved route; it does not identify the missing fact for you.

MESSAGE OR ACTION	IT DOES NOT PROVE	LIKELY UNRESOLVED ISSUE	CHECK NEXT
"Product has characteristics of Product Containing Button/Coin Battery."	Federal scope or the suspected component.	Amazon's record still supports the category, or identity/configuration remains incomplete.	Audit every component and catalog surface; cross-reference ASIN, model, revision, and power source.
"Different battery type" - show the compartment.	That one compartment photograph is sufficient.	Alternate cell is not visible, contextual, model-linked, or complete across accessories.	Show compartment in context, legible cell, exact datasheet, remote, manual, and identity.
Request for UL 4200A / Part 1263 report and GCC.	That the physical product actually contains or is designed to use a covered cell.	The ASIN is currently routed as in scope.	If genuinely outside scope, use the appeal action and prove why. If in scope, follow the current documentation or TIC route.
The same response returns.	A disclosed algorithm, human review, or that more of the same will work.	Contradiction, missing attachment, incomplete identity, omitted component, or wrong legal premise.	Compare the exact response with the prior packet. Add only evidence that resolves the identified delta.

SIX RECURRING FAILURE POINTS

IDENTITY GAP Files do not reach the exact ASIN, model, revision, or photographed unit.	CONFIGURATION GAP Remote, controller, backup cell, sensor, or accessory is omitted.	VISUAL GAP Exterior views never prove the actual cell or open compartment.
CATALOG GAP Backend, A+ Content, manual, parent data, or legacy version contradicts the packet.	AUTHORITY GAP A generic letter, unrelated report, SDS, or certificate asserts more than it proves.	SCOPE ERROR The design accepts a covered cell, but the appeal relies on battery absence or ignores the remote.

Recovery rule: Diagnose the delta. Do not resend the same explanation and files without resolving a specific missing or conflicting fact.

Build an evidence map - not an emotional history

The packet should let the reviewer move from each claim to one named exhibit and exact product identity.

EVIDENCE INDEX

EXHIBIT	FILENAME	SINGLE FACT PROVED	ASIN / MODEL / REVISION LINK
E01			
E02			
E03			
E04			
E05			
E06			

EXPLANATION ORDER

- 01 Identify the request, child ASIN, seller SKU, exact variation, model, and revision.
- 02 State the complete sold configuration and every power source, including remotes and accessories.
- 03 Apply the federal definition narrowly to the verified components and cells.
- 04 Identify inaccurate catalog data corrected, with dated before-and-after evidence.
- 05 Index every attachment and state the single fact it proves.
- 06 Ask Amazon to remove the requirement from the identified ASIN only when the documented configuration supports that request.

MANUFACTURER DECLARATION - SUPPORTING RECORD ONLY

No universal Amazon template is published. Include legal manufacturer identity and contact; exact ASIN/model/revision; every component and battery type/model/quantity/location; an express statement on whether any part contains or is designed to use a covered cell; date; signer's name, title, and signature. The declaration should point to - not replace - physical and technical evidence.

Submit once the record is controlled

Use the live ASIN action, preserve every submission, and retain the evidence that supports the decision.

PACKET COMPLETE

- ☐ Exact child ASIN, model, and current revision confirmed.
- ☐ Main unit, remote, controllers, and every accessory inspected.
- ☐ Every power source and accepted cell identified by model and location.
- ☐ Photographs form one current, unedited, identity-linked sequence.
- ☐ Manual, package, frontend, backend, and sibling data reconciled.
- ☐ Old and current versions or FBA lots segregated where necessary.
- ☐ Scope conclusion matches the verified design and official definition.
- ☐ Evidence index, filenames, and requested Amazon action are complete.
- ☐ No false GCC/CPC, irrelevant UL report, altered image, or concealed fact.

SUBMIT THROUGH THE LIVE ACCOUNT HEALTH ACTION

1. Seller Central: **Performance - Account Health**.
2. Open **Product policy compliance** and the applicable issue.
3. Under **Next steps**, select **Submit** for the affected product.
4. Select **Appeal requirement**.
5. Choose the reason matching the request.
6. Explain why the requirement does not apply or why the product was incorrectly identified.
7. Submit through that ASIN-specific action. Labels can vary; the signed-in panel controls.

PRESERVATION RECORD

Notice date / time	ASIN / SKU / model / revision
Case ID	Submission date
Exact explanation saved	Filenames / versions / hashes
Catalog before / after	Every Amazon response
Inventory lot status	Current outcome / next review

DO NOT: create a false certificate; test a nonexistent coin-cell design; alter physical evidence; remove truthful battery information; ignore a remote or accessory; treat "battery not included" as the scope test; resubmit unchanged files; promise approval or a review deadline.

Official rules, guidance, and policy

Each source is listed with its status and the specific proposition it supports.

S01	16 CFR Part 1263 - Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries https://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-1263 Primary federal rule for scope, performance, labeling, and exclusions. Current text checked August 5, 2026.	CURRENT
S02	16 CFR § 1263.2 - Definitions https://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-1263/section-1263.2 Source for diameter greater than height and for products containing or designed to use a covered cell, including batteries sold separately.	CURRENT
S03	16 CFR § 1263.3; Reese's Law; UL 4200A revision history https://www.ecfr.gov/current/title-16/chapter-II/subchapter-B/part-1263/section-1263.3 https://www.govinfo.gov/content/pkg/PLAW-117publ171/html/PLAW-117publ171.htm https://shopulstandards.com/ProductDetail.aspx?productId=UL4200A_1_S_20150210 Establishes the federally incorporated edition and the boundary between publication of a later voluntary-standard revision and federal adoption.	REVIEWED
S04	CPSC Button Cell and Coin Battery Business Guidance and FAQs https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Button-Cell-and-Coin-Battery https://www.cpsc.gov/FAQ/Button-Cell-and-Coin-Battery-FAQs Official CPSC scope, dates, exclusions, and confirmation that a product designed to use a covered cell remains subject when the cell is sold separately.	CURRENT
S05	CPSC certificate guidance and mandatory eFiling announcement https://www.cpsc.gov/Business--Manufacturing/Testing-Certification/Childrens-Product-Certificate https://www.cpsc.gov/Business--Manufacturing/Testing-Certification/General-Certificate-of-Conformity https://www.cpsc.gov/Newsroom/News-Releases/2026/CPSC-Implements-Mandatory-eFiling-for-Certificates-of-Compliance-Targeting-Dangerous-For-eign-Imports Separates CPC/GCC responsibility and the July 8, 2026 certificate eFiling change from the Part 1263 applicability question.	CURRENT
S06	CPSC NyxQuark Portable Misting Fans warning https://www.cpsc.gov/Warnings/2026/CPSC-Warns-Consumers-to-Immediately-Stop-Using-NyxQuark-Portable-Misting-Fans-Due-to-Risk-of-Serious-I-njury-or-Death-from-Battery-Ingestion-Violates-Mandatory-Standard-for-Consumer-Products-with-Coin-Batteries Official example showing why an included remote and its cell belong in the complete product analysis.	OFFICIAL EXAMPLE
S07	Amazon button-cell policy, appeal instruction, and authorized TIC route https://sellercentral.amazon.com/help/hub/reference/external/GUBLQYWAJDBADUVK?locale=en-US https://sellercentral.amazon.com/help/hub/reference/external/GC35Z63FGCUCUWXX?locale=en-US https://sellercentral.amazon.com/help/hub/reference/external/GUTZ2R2DD6P2UMVB Official Amazon policy and routing context. The live signed-in action panel remains controlling for the ASIN.	CURRENT / SIGN-IN MAY APPLY

Method: Federal rules, official guidance, marketplace policy, moderator guidance, seller reports, manufacturer data, and expert synthesis are kept as separate source levels. Access / review date: August 5, 2026.

Operational evidence and method boundary

Seller experience is useful operational evidence, but it is not federal law or a universal Amazon procedure.

S08	Amazon product-safety compliance migration announcement https://sellercentral.amazon.com/seller-forums/discussions/t/28f096f5-6da1-479b-8868-a00711d1cef5 May 22, 2025 announcement moving product and food safety requirements into Policy Compliance within Account Health.	OFFICIAL ANNOUNCEMENT
S09	Amazon moderator guidance - April 16, 2026 https://sellercentral.amazon.com/seller-forums/discussions/t/10bdc6dc-84ae-4274-b23e-b1082d1f96c7 Current navigation and six-sided / compartment-image guidance for a seller contesting a no-button-battery classification.	CASE-SPECIFIC GUIDANCE
S10	Amazon moderator guidance - June 8 and July 21, 2026 https://sellercentral.amazon.com/seller-forums/discussions/t/85eaba69-2b84-4707-8810-e15e9f988c6b https://sellercentral.amazon.com/seller-forums/discussions/t/6e8f20c7-3445-4569-9a50-6011509bf8ab LiPo evidence / existing-case upload guidance and recent confirmation of the in-scope document-and-image route. Neither is a universal reinstatement promise.	CASE-SPECIFIC GUIDANCE
S11	Seller-reported no-battery, AAA, CR2, and legacy-record cases https://sellercentral.amazon.com/seller-forums/discussions/t/b8fe0cd8-04e0-41dc-ba47-160cff71f34a https://sellercentral.amazon.com/seller-forums/discussions/t/7e4f5c25-ef5b-4e28-ba44-75c3088e30c0 https://sellercentral.amazon.com/seller-forums/discussions/t/b98de4e1-2b93-45a2-9f6b-155d3f42a58d https://sellercentral.amazon.com/seller-forums/discussions/t/9ed24117-d848-4c36-bc23-4f1af8ff0265 Operational evidence for rejection language, repeated appeals, CR2 confusion, and version conflict. Most threads publish no confirmed final outcome.	SELLER-REPORTED
S12	Seller-reported USB / LiPo cases and one active-ASIN outcome https://sellercentral.amazon.com/seller-forums/discussions/t/6a31ab16-e4f1-4e4d-923d-346cef855de2 https://sellercentral.amazon.com/seller-forums/discussions/t/e0b9e5c3-1845-48d8-b807-d3626514790a https://sellercentral.amazon.com/seller-forums/discussions/t/e4e56438-ad0b-4f67-bbb3-3db14430bcd5 Shows truthful compatibility language, built-in LiPo evidence problems, and a case-specific active-ASIN confirmation without proving which change caused the result.	SELLER-REPORTED
S13	Energizer AA, AAA, CR2, and CR2032 datasheets https://data.energizer.com/pdfs/e91.pdf https://data.energizer.com/pdfs/e92.pdf https://data.energizer.com/pdfs/1cr2.pdf https://data.energizer.com/pdfs/cr2032.pdf Illustrates why exact manufacturer/model dimensions - not naming similarity - support the geometry analysis.	MANUFACTURER DATA
S14	Registry Intelligence expert synthesis The identity chain, evidence hierarchy, image sequence, catalog workbook, decision route, appeal anatomy, and rejection diagnosis are synthesis from the cited sources. Amazon has not published them as an approved template and does not guarantee reinstatement.	METHOD

CONTINUE WITH VERIFIED CONTEXT

Read. Check. Trace the source.

READ THE FULL ARTICLE

<https://polandoc.com/amazon-button-cell-battery-misclassification/>

OPEN THE GUIDE COLLECTION

<https://polandoc.com/amazon-marketplace-compliance-guides/>

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