



DPC: 25/30478347 DC

BSI Group Headquarters

389 Chiswick High Road London W4 4AL

Tel: +44 (0)20 8996 9000

Fax: +44 (0)20 8996 7400

www.bsigroup.com

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Responsible committee: CH/437 Electronic Cigarettes & E-liquids

Interested committees:

Title: Draft BS EN 18165 BS Electronic cigarettes and e-liquids. Child safety requirements and test methods.

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Responsible Committee Secretary: Mr Paul Lambert (BSI)

Direct tel:

E-mail: paul.lambert@bsigroup.com

Full document details: 25/30478347 DC

Introduction

This draft standard is based on national and international discussions. Your comments on this draft are invited and will assist in the preparation of the consequent standard.

For international standards, comments will be reviewed by the relevant UK national committee before sending the consensus UK vote and comments to the international committee, which will then decide appropriate action. If the international standard is approved, it is usual for the text to be published as a British Standard.

For national standards, comments will be reviewed by the relevant UK national committee and the resulting standards published as a British Standard.

UK Vote

Please indicate whether you consider the UK should submit a negative (with supporting technical reasons) or positive vote on this draft. Please indicate if you are aware of any reason why this draft standard should not be published as a British Standard.

Submission of Comments

- **Annotated drafts are not acceptable and will be rejected.**
- All comments should be submitted online at <https://standardsdevelopment.bsigroup.com/>. You will need to register in order to comment.

Template for comments and secretariat observations

Date: xx/xx/20xx	Document: ISO/DIS xxxx
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1	2	(3)	4	5	(6)	7
MB	Clause No./ Subclause No./Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note	Type of comment	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
	3.1	Definition 1	ed	Definition is ambiguous and needs clarifying.	Amend to read '...so that the mains connector to which no connection...'	
	6.4	Paragraph 2	te	The use of the UV photometer as an alternative cannot be supported as serious problems have been encountered in its use in the UK.	Delete reference to UV photometer.	

CEN/TC 437

Date: 2025-03

prEN 18165:2025

Secretariat: AFNOR

Electronic cigarettes and e-liquids — Child safety requirements and test methods

**Elektronische Zigaretten und Liquids für elektronische Zigaretten — Anforderungen
an die Kindersicherheit und Prüfverfahren**

**Cigarettes électroniques et e-liquides — Exigences de sécurité pour les enfants et
méthodes de test**

CCMC will prepare and attach the official title page.

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European foreword

This document (prEN 18165:2025) has been prepared by Technical Committee CEN/TC 437 “Electronic cigarettes and e-liquids”, the secretariat of which is held by AFNOR.

This document is currently submitted to the CEN Enquiry.

This document provides an Assessment Tool expressing the rules contained in Clause 6.

Introduction

This document was developed in response to Article 20(3) of the EU Directive 2014/40/EU Tobacco Products Directive that states: *“Member States shall ensure that (g) electronic cigarettes and refill containers are child- and tamper-proof, are protected against breakage and leakage and have a mechanism that ensures refilling without leakage”*. Additionally, introductory remarks of the Tobacco Products Directive state: *“(40) Electronic cigarettes and refill containers could create a health risk when in the hands of children. Therefore, it is necessary to ensure that such products are child- and tamperproof, including by means of child-proof labelling, fastenings, and opening mechanisms”*.

The document provides methods on how to test and document that an electronic cigarette or refill container is child-resistant and is protected against breakage and leakage.

The purpose is to reduce potential risks for children associated with these products. The identified primary risk for children related to these products is contact with or ingestion of nicotine-containing liquid. Therefore this document applies only to electronic cigarettes and refill containers which contain nicotine or are intended to contain nicotine as part of their normal product lifecycle.

It is important that manufacturers ensure child safety within their products, in the development of electronic cigarette devices as well as refill containers, to make sure that the products are sufficiently child safe if children unintentionally access the devices or refill containers.

To ensure the products are child resistant, the following must be taken into consideration:

- Child appeal;
- Mechanical resistance against breakage and leakage;
- Child resistant fastenings and opening mechanisms.

1 Scope

This document specifies child resistance mechanisms and tests methods for assuring child safety within electronic cigarettes and refill containers.

NOTE Attention is drawn to the definitions laid down in EU Directive 2014/40/EU Tobacco Product Directive.

This document is applicable for electronic cigarettes and refill containers which are containing or intended to contain nicotine.

This document does not apply to tamper resistance nor general product safety requirements which are not specific to child safety.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

EN 862:2016,¹ *Packaging — Child-resistant packaging — Requirements and testing procedures for non-reclosable packages for non-pharmaceutical products*

CEN/TS 17287:2019, *Requirements and test methods for electronic cigarette devices*

EN 60068-2-75:2014, *Environmental testing — Part 2-75: Test — Test Eh: Hammer tests*

ISO 8317:2015, *Child-resistant packaging — Requirements and testing procedures for reclosable packages*

ISO 13127:2012, *Packaging — Child resistant packaging — Mechanical test methods for reclosable child resistant packaging systems*

ISO 28862:2018, *Packaging — Child-resistant packaging — Requirements and testing procedures for non-reclosable packages for non-pharmaceutical products*

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp/>
- IEC Electropedia: available at <https://www.electropedia.org/>

3.1

child appeal

ability of a product to appeal to children by design or presentation

¹ withdrawn