

AMAZON CHILDREN'S TOY COMPLIANCE

Does Amazon's Annual Toy Verification Require Retesting or a New CPC?

Separate Amazon's annual review, its 12-month report rule, and the federal events that control CPC reissuance.

THE SHORT ANSWER

No - not automatically. A current, matching U.S. test report may qualify for document verification. An older report generally requires retesting for Amazon; the CPC outcome depends on why the test occurred and whether the certificate remains accurate.

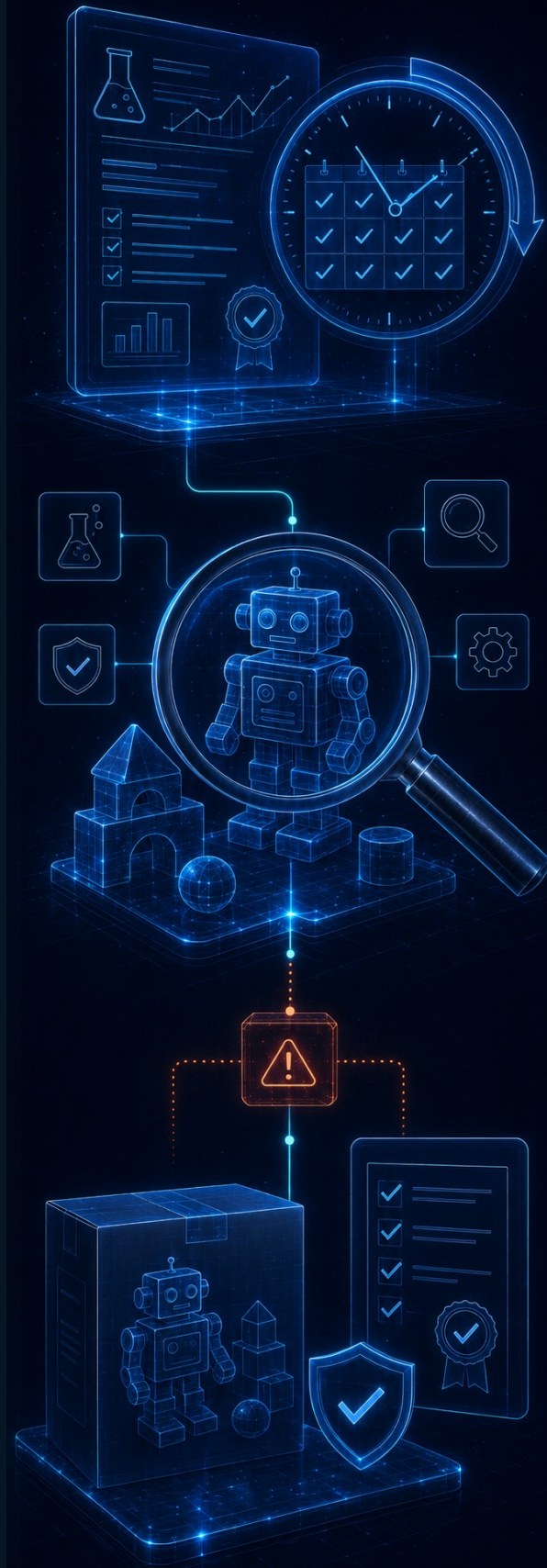
FOCUSED AMAZON COMPLIANCE MINI-GUIDE - JULY 2026

By Natallia Vasilyeva | U.S. market only

Full article: polandoc.com/amazon-annual-toy-verification-testing-cpc/

All Amazon mini-guides: polandoc.com/cpsc-efiling-amazon-pdf-guides/

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SECTION 01 / CORE ANSWER

Three clocks control one Amazon toy decision

Annual verification, test-report age, and federal testing are related but not interchangeable. Identify the clock before paying for a new test.

01

ANNUAL REVIEW

Amazon Direct Validation

A recurring marketplace event for an affected children's-toy ASIN.

Two possible routes: new testing or verification of existing documents.

02

REPORT WINDOW

Amazon's 12-month rule

For the current U.S. route, the supporting report generally must have been issued within the past 12 months.

A newer CPC date does not refresh an older report.

03

FEDERAL EVENT

CPSC testing trigger

Continuing production may reach periodic testing, or a material change may require affected testing immediately.

The legal trigger controls whether to keep, reissue, or replace the CPC.

8-MONTH REPORT

Inside Amazon's age window

It can still fail if the toy, factory, materials, variants, or applicable rules no longer match the tested product.

15-MONTH REPORT

Possibly valid federally, too old for Amazon

It may still fall inside a qualifying two-year federal plan, yet fail Amazon's current North American document-verification route.

CENTRAL DECISION RULE

First identify which clock is driving the request: Amazon's annual event, Amazon's report-age rule, or a federal testing and certification event.

SECTION 02 / WORKING ANSWER

Decision matrix: what happens next?

Use the facts in the left column, then read across. The actual ASIN notice, report, product history, and TIC review still control.

YOUR FACTS	AMAZON ROUTE	TESTING	CPC ACTION
Report issued within the past 12 months; exact toy, factory, materials, variants, and rules match; no later change.	Document verification through an Amazon-approved TIC.	Usually no new Amazon test if the file is complete and verifiable.	No automatic new CPC solely because Amazon opened the annual request, if the existing CPC remains accurate.
The available North American test report is more than 12 months old.	Retesting route under Amazon's current Direct Validation guidance.	Yes for Amazon, even if the physical toy appears unchanged.	Identify why the new test is performed. Periodic testing, material change, and Amazon-only supplemental testing have different outcomes.
Continuing production reaches the responsible firm's federal periodic-testing deadline.	Use the new report in the TIC workflow if the ASIN is notified.	Federal periodic testing is due under the qualifying testing plan.	CPSC business guidance says to reissue the CPC after periodic testing.
A design, process, component, coating, factory, or component source changed in a way that could affect compliance.	Submit evidence for the materially changed product.	Test every rule the change could affect; a full repeat is not always needed.	A new CPC is expressly required under 16 CFR 1107.23.

TWO IMPORTANT EXCEPTIONS

Static old inventory and an inaccurate or wrongly issued CPC need separate analysis; neither fits a simple 'annual retest = new CPC' formula.

SECTION 03 / DOCUMENT ROUTE

Can the existing test report be verified?

A report from another laboratory can be reviewed by an Amazon-approved TIC, but the document route works only when the full file reconciles.

01
AGE
Inside Amazon's current window

For the U.S. Direct Validation route, the report generally must have been issued within the past 12 months.

02
IDENTITY
Exact product and ASIN match

Model, dimensions, age grading, colors or variants, photographs, packaging, and product identifiers must reconcile.

03
SCOPE
Complete, passing rule coverage

The report must address the rules Amazon and federal law require for that exact toy; incomplete or false testing can be rejected.

04
LAB
CPSC acceptance for U.S. certification

Confirm that the original laboratory was CPSC accepted on the test date for every certification test and exact scope relied upon.

05
HISTORY
No later material mismatch

Check the design, process, components, coatings, factory, and sourcing history after the tested sample was produced.

06
CPC
Accurate certificate and issuer

The CPC must identify the responsible certifier, exact product, current rules, manufacturing facts, and the evidence it actually relies on.

THE AUTHORIZED TIC MAKES THE MARKETPLACE DECISION

A file can be genuine and still be unusable. Ask whether the TIC will validate the documents or require testing - and why.

1 / ROUTE	2 / FAILURE	3 / SCOPE
Will you validate the existing report?	If not, which exact policy or field failed?	If testing is needed, full or rule-specific?

A NEWER CPC DATE DOES NOT REFRESH AN OLDER TEST REPORT.

SECTION 04 / CERTIFICATE OUTCOME

What exactly happens to the CPC?

Do not assume every laboratory event has the same certificate result. The reason for testing controls the action.

01

EXISTING-DOCUMENT VERIFICATION ONLY

KEEP - USUALLY

No automatic new CPC if the existing certificate is properly issued, accurate, and supported by the verified file.

02

FEDERAL PERIODIC TESTING

REISSUE

Following periodic testing, CPSC business guidance instructs the responsible certifier to reissue the CPC.

03

TESTING AFTER A MATERIAL CHANGE

NEW CPC REQUIRED

16 CFR 1107.23 expressly requires affected third-party testing and a new CPC for the materially changed product.

04

AMAZON-ONLY SUPPLEMENTAL RETEST

ASSESS ACCURACY

CPSC publishes no Amazon-specific automatic reissuance rule. If the new results will support the certificate going forward, reissue so the testing information remains accurate.

05

WRONG ISSUER OR INACCURATE CPC

CORRECT OR REISSUE

New testing is not always necessary when the responsible certifier can lawfully rely on valid, complete, traceable evidence.

DO NOT SIMPLY CHANGE THE DATE

A CPC is a certification based on evidence - not a device for making an old report look current. Never backdate or edit another party's certificate.

SECTION 05 / WORKED CASES

Four hard scenarios sellers actually face

The same annual request can produce different results. Compare the report age, product history, production status, and legal trigger.

01 / CURRENT FILE

Eight-month report; same toy

FACTS

- The report is current, complete, and matches the exact toy.
- AMAZON
- Ask the TIC to verify the existing documents.
- CPC
- No automatic new CPC if the certificate remains accurate.

02 / OLD REPORT

Fifteen-month report; same toy

FACTS

- No physical change, but the North American report is over 12 months.
- AMAZON
- Retesting is required under current Direct Validation guidance.
- CPC
- Determine whether the test is periodic, material-change, or Amazon-only.

03 / MATERIAL CHANGE

New paint or component supplier

FACTS

- The source change could affect lead, phthalate, coating, or other compliance.
- TESTING
- Test every affected rule; a full repeat is not always required.
- CPC
- Issue a new CPC for the materially changed product.

04 / STATIC INVENTORY

Production stopped; old FBA stock remains

AMAZON

- A notified ASIN can still face the 12-month report rule.
- FEDERAL
- Storage alone generally does not trigger periodic testing of continuing production.
- CPC
- The existing CPC may cover unchanged units; assess any later test separately.

ONE ACTION THAT IS NEVER A FIX

Do not create a newly dated CPC merely to make an old report appear current. The report date, tested product, and supporting evidence must remain traceable.

SECTION 06 / FINAL CHECKLIST

Close the file in six controlled steps

Do not buy testing first and analyze later. Build the decision record in this order and preserve what was checked.

1
READ
Open the exact ASIN notice and deadline in Account Health.

2
AGE
Calculate the report age from its actual issuance date.

3
MATCH
Reconcile product, variants, factory, materials, rules, and lab scope.

4
TRIGGER
Identify periodic testing, material change, or an Amazon-only event.

5
TIC
Ask whether the authorized TIC will verify documents or require testing.

6
CPC
Keep, reissue, replace, or correct the CPC based on the real trigger.

NEED THE FULL ANALYSIS?

The expanded article adds the full decision matrix, five hard scenarios, old FBA inventory analysis, TIC questions, current Part 1110 certificate fields, and the complete primary-source ledger.

READ THE FULL ARTICLE
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AUTHOR AND EDITORIAL RESPONSIBILITY

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PRIMARY SOURCES

[Amazon DV Part 1](#)
[Amazon DV Part 4](#)
[16 CFR 1107.21](#)
[16 CFR 1107.23](#)
[16 CFR part 1110](#)
[CPSC guidance](#)

Reviewed July 23, 2026. U.S. children's toys only. Educational information, not legal advice or a product-specific testing determination. Confirm the live Seller Central request and current official requirements.