

CPSC Product Registry

Advanced Guide for U.S. Importers

15 difficult operational questions that must be resolved before a certificate record is reused in a Reference PGA Message Set.

ADVANCED OPERATIONAL FIELD GUIDE - JULY 2026

Full article: polandoc.com/cpsc-product-registry-guide/

Free guides: polandoc.com/cpsc-efiling-downloadable-guides/

Registry Intelligence: polandoc.com/



START HERE

The control architecture behind every Registry record

Five layers must stay aligned. A correct screen entry cannot cure a wrong product, version, or broker handoff.



CONTROL RULE: verify the product-certificate-version-entry match before identifiers leave the importer.

Sources: CPSC Product Registry page; Product Registry User Guide v3, pp. 7-8 [1][2]

QUESTION 01

Can one administrator control several importer accounts?

Account design can block cross-company collaboration before certificate work begins.



- Use an importer employee as the Business Account Administrator; trade partners belong in collection-specific roles.
- Each email account must belong to one individual. Do not build access around a shared mailbox or a departing employee.
- Where feasible, maintain a documented backup administrator and a removal procedure. This is a Registry Intelligence control recommendation.

DESIGN FAILURE: making a broker or consultant the account-level owner can create a continuity and collaboration problem.

QUESTION 02

How should Product Collections be designed before data is loaded?

A collection is an access-control boundary, not merely a folder name.

AXIS 01

DATA OWNER

Who verifies and maintains the certificate data?

AXIS 02

ACCESS GROUP

Which employees and partners need the same records?

AXIS 03

PRIVACY

Must manufacturer, lab, or contact data be isolated?

AXIS 04

CHANGE RATE

Will products and certificates change on the same cycle?

Collection design record

For each collection, record its owner, membership rule, privacy setting, certification authority, naming convention, and offboarding trigger.

Avoid collections based only on temporary projects or individual employees. A durable boundary is easier to govern and audit.

IRREVERSIBLE CONSEQUENCE: certificates cannot be copied into or out of a collection with Trade Party Privacy enabled.

QUESTION 03

What does Trade Party Privacy actually change?

The choice controls visibility, identifier uniqueness, and whether certificate records can cross collection boundaries.

PRIVACY OFF

Shared trade-party list

All non-private collections in the Business Account use one shared list of manufacturers, laboratories, and points of contact.

- Alternate ID and GLN uniqueness is enforced across the shared list.
- Easier reuse, but broader visibility within the Business Account.

PRIVACY ON

Collection-isolated trade parties

Trade parties added to the private collection are visible only to users assigned a role in that collection.

- Uniqueness is enforced only within that private collection.
- Only an Account Administrator can add one party to multiple private collections at once.

The setting cannot be toggled after collection creation. Private collections also block copying certificates into or out of the collection.

DECIDE BEFORE LOADING: privacy is a structural boundary, not a display preference.

Source: Product Registry User Guide v3, pp. 33-35 [2]

QUESTION 04

How do you choose a Primary Product ID that survives repeat imports?

The Primary Product ID anchors versions and the broker's Reference key. It cannot be treated as an informal label.

PRIMARY
PRODUCT ID

GTIN

UPC

SKU

MODEL

SERIAL

REGISTERED

ALTERNATE

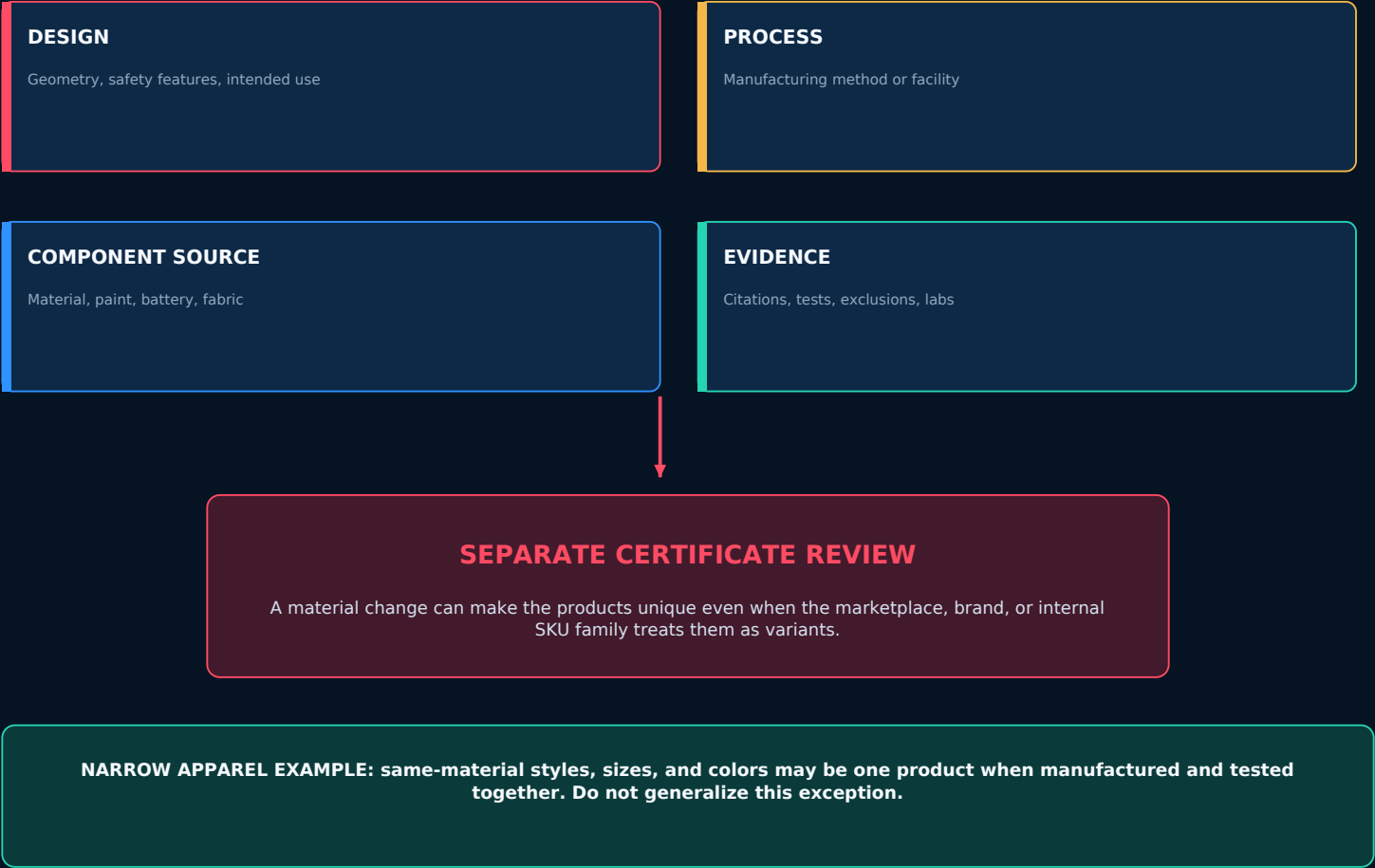
- Prefer an identifier visible on the product packaging, packing list, or invoice so CPSC and the broker can reconcile the product.
- The chosen value must match its declared ID type. Alternate ID is not a place for descriptions, supplier notes, or multiple values.
- The current CSV rule limits the Primary Product ID to 19 alphanumeric characters. Additional IDs can support matching but do not replace the primary key.
- The manual editing workflow does not permit editing the Primary Product ID. A mistaken anchor can force a new product record.

KEY CONTROL: select the Primary Product ID from durable commercial evidence before the first certificate is certified.

QUESTION 05

When are two variants one product - and when are they not?

Commercial SKU grouping does not decide the legal boundary of a product certificate.

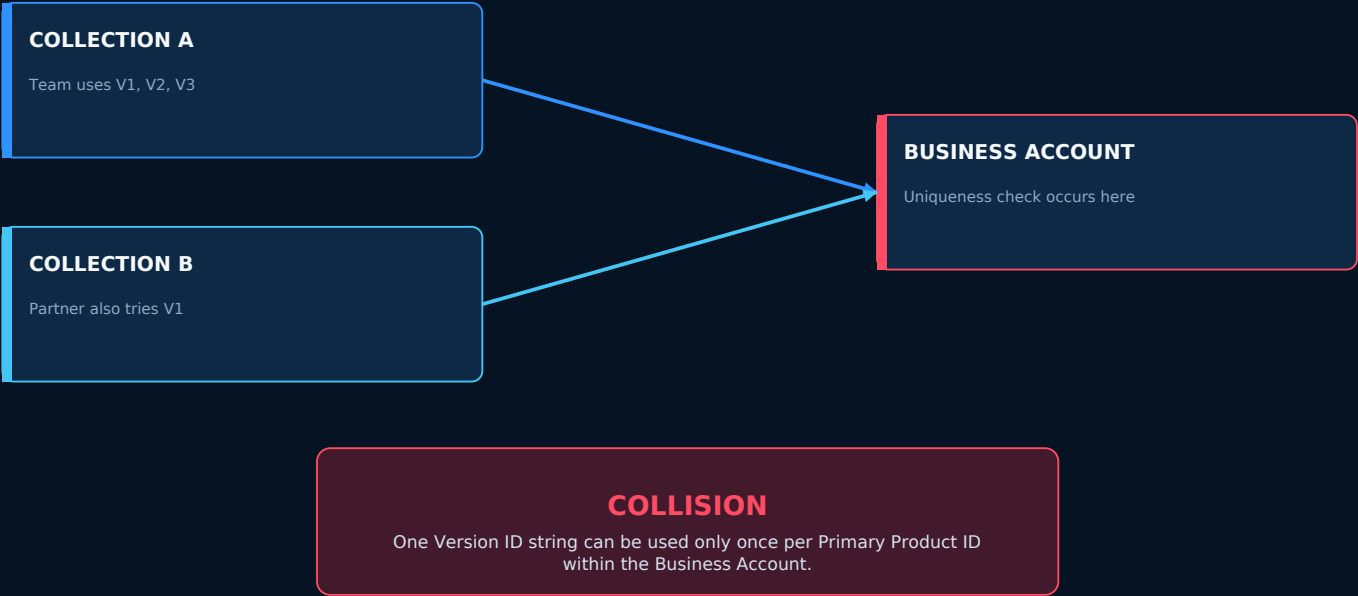


DECISION RULE: analyze the certifiable finished product, not the carton count or marketplace listing.

QUESTION 06

How should Version IDs be governed across collections and teams?

Version uniqueness is enforced at Business Account level, while several groups may be creating records independently.



- Adopt one account-wide version scheme, not a separate numbering convention for each collection or supplier.
- Maintain a version register containing Product ID, Version ID, status, certification time, change reason, and approving user.
- Keep the ID within the current 19-character CSV limit and use a value that humans can reconcile without decoding private notes.

CONTROL RULE: Version ID generation is an account-wide governance function, even when certificate work is delegated.

Sources: Product Registry FAQ v1.4, p. 3; CSV Upload Guide v3, p. 7 [3][5]

QUESTION 07

Can a certified record be corrected without a new Version ID?

The answer depends on status, the active editing window, and whether the certificate has already been used in Reference PGA.



CURRENT OPERATIONAL RULE

CPSC describes a 48-hour editing grace period, but states that the exact duration is subject to change. An edit during the active window requires re-certification, and re-certification restarts the window.

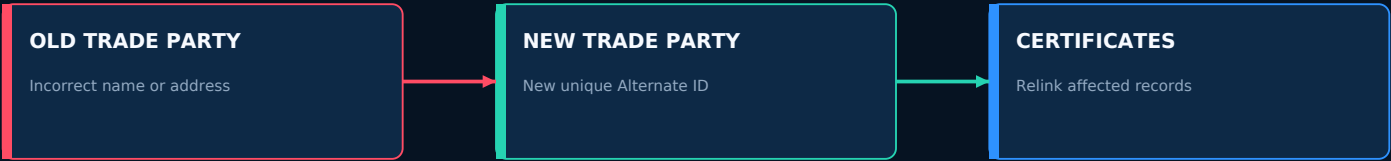
- If the record was used in a Reference PGA Message Set, the grace period ends for same-version correction.
- The Primary Product ID itself cannot be edited in the manual workflow.
- Current CSV behavior does not create a new version while the existing completed certificate remains inside its editing window.

BEFORE EDITING: check status, certification time, and Reference PGA use - then preserve the evidence for the chosen path.

QUESTION 08

What if the stored manufacturer, lab, or records contact is wrong?

Reusable Trade Party records can spread one bad address or identity across many certificates.



The current FAQ allows name and address correction only during a short grace period. That window ends immediately when any certificate using the Trade Party is referenced in a PGA filing. Phone and email may be updated at any time.

- Outside the active window, create a corrected Trade Party with a new Alternate ID and discontinue use of the old record.
- Update every affected certificate to the correct party; the certificate edit may itself require re-certification or a new Version ID.
- CPSC support may correct some situations on request, but the official guide warns that this may delay data submission.

PREVENTION: verify reusable Trade Party identity, address, country, GLN/Alternate ID, phone, and email before first use.

QUESTION 09

How must component testing be represented in the finished-product record?

The certificate must preserve the testing chain used to support compliance, not merely name one laboratory.



Map each laboratory to the specific citation codes it tested. Report the most recent testing date. When a permitted testing exclusion applies, use the exclusion code with laboratory type NOL instead of inventing a lab record.

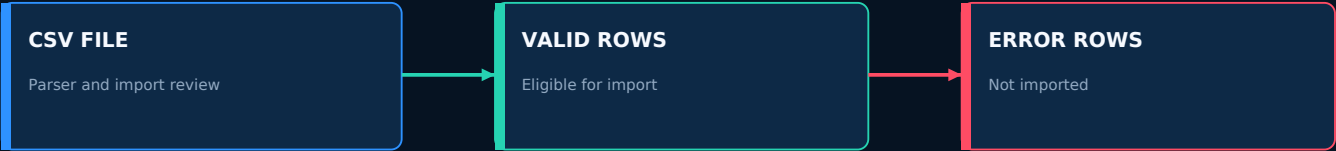
- Test Report ID, URL, access key, and component description are optional fields, but supporting records may still be requested.
- There is no limit to the number of laboratories in the CSV; add numbered lab column groups when more than two are needed.

DO NOT SUBSTITUTE: a testing exclusion belongs on a required certificate; it is not a Disclaim Message Set.

QUESTION 10

Can a partially valid CSV import be accepted safely?

Yes - but only if the accepted rows and rejected rows are reconciled as two controlled populations.



Import review choices

Cancel imports nothing. Import valid products accepts the valid population while error rows remain outside the collection. Authorized users may optionally certify eligible rows during import; otherwise they enter Awaiting Certification status.

- Save the import log and the accepted product count before correcting and resubmitting rejected rows.
- Mark source rows with an immutable job/row reference so a corrected re-upload cannot silently duplicate products already accepted.
- Confirm whether automatic certification was selected; a mixed batch can contain both certified and Awaiting Certification records.

RECONCILIATION GATE: accepted rows + rejected rows must equal the reviewed source population before the job is closed.

QUESTION 11

When does a CSV update modify the current record instead of creating a new version?

Status and grace-period behavior control the result - not only the Version ID values in the file.

INCOMPLETE	UPDATE CURRENT	Product Update=Y; Current Version ID required
AWAITING CERTIFICATION	UPDATE CURRENT	New version is not created
COMPLETE + GRACE ACTIVE	UPDATE CURRENT	Current and New IDs may match
COMPLETE + WINDOW ENDED	NEW VERSION	Use a unique New Version ID

TRADE PARTY TRAP: if a stored party is reused, its Is New? field must be N or blank. Otherwise the upload attempts to create another party. If N is used, accompanying name/address values are ignored.

TEST THE INTENDED STATE CHANGE ON A SMALL CONTROL FILE BEFORE A LARGE VERSION UPDATE.

QUESTION 12

What exact record should the customs broker receive?

Three identifiers point to one certified Product Registry record. A correct value from the wrong record is still wrong.



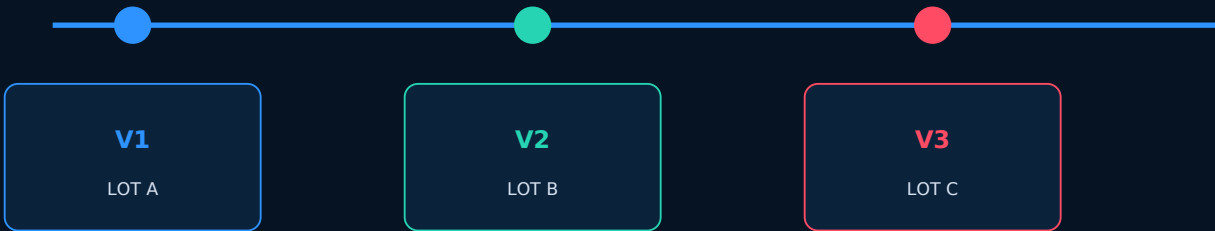
- Copy and validate the three identifiers as one unit; do not assemble them from separate emails or old spreadsheets.
- Include evidence that the Product ID appears on packaging, invoice, or packing list and that the selected version is Complete.
- Require the broker to acknowledge the exact key received. The Product Registry does not transmit anything to ACE by itself.

RELEASE ONLY THE APPROVED PRODUCT-CERTIFICATE-ENTRY MATCH.

QUESTION 13

Does the newest certificate always match the inventory being entered?

No. The newest version is only the default Registry view; the merchandise still must match the facts in the selected certificate.



The Registry preserves earlier completed versions behind the current record. Use manufacturing facts, test evidence, applicable citations, and product identity to decide which certificate describes the goods. Do not attach the latest key automatically to older stock.

- Freeze the approved certificate key at the shipment, lot, PO, or inventory-withdrawal level before the broker handoff.
- A material product change can require a separate product certificate, not merely a higher database version.

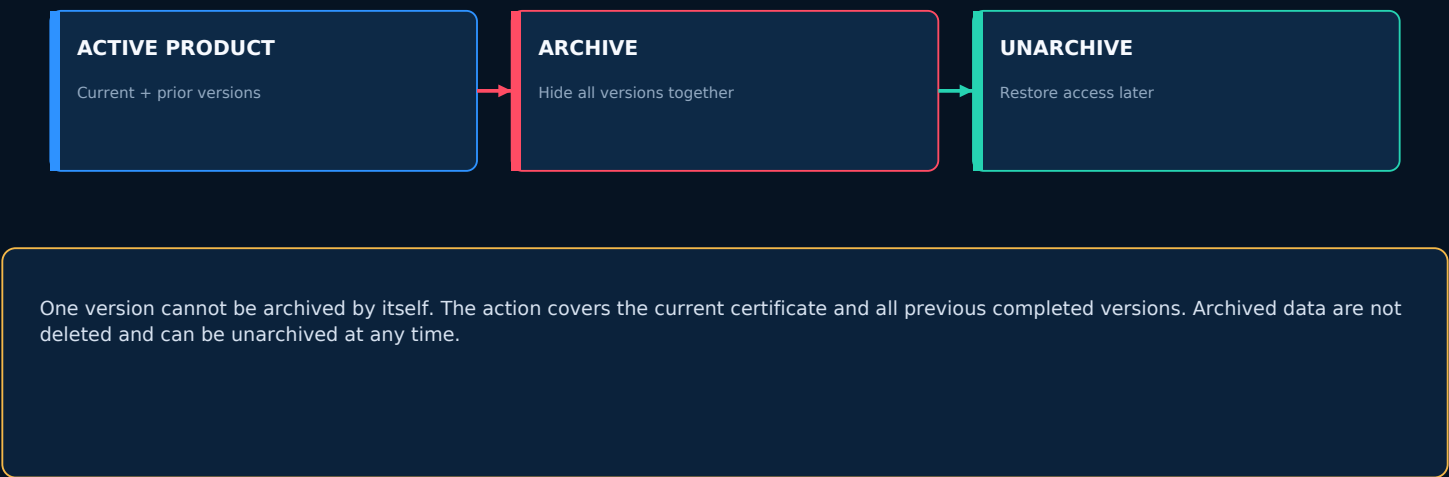
OPERATING PRINCIPLE: match the certificate to the merchandise - not the merchandise to whichever certificate is newest.

Sources: Product Registry User Guide v3, pp. 50-53; Product Registry FAQ v1.4, pp. 2-3 [2][3]. Inventory control is an inference.

QUESTION 14

What does archiving do - and what does it not prove?

Archive is the Registry's deletion-equivalent for visibility, but it preserves the record and every completed version.



- Archive obsolete or erroneous product records to remove them from the active working view without destroying the history.
- Do not use archive as a substitute for correcting a broker handoff, an ACE transmission, or an unsupported certificate decision.
- Export current and prior versions before major cleanup when an offline audit record is required.

ARCHIVE CHANGES VISIBILITY. IT DOES NOT ERASE THE FACT THAT A VERSION MAY HAVE BEEN USED.

QUESTION 15

How can external partners collaborate without taking over accountability?

Permissions can be delegated. The importer's responsibility for certification remains.

ACCOUNT ADMIN	Importer employee	All collections; user and account control
COLLECTION ADMIN	Importer or partner	Manage one collection; certify only if granted
COLLECTION EDITOR	Importer or partner	Enter and attest; certify only if granted
COLLECTION VIEWER	Importer or partner	Read-only

Certification permission is separate for Collection Administrators and Editors. Even when granted, the importer remains accountable for the certification statement and data accuracy.

ACCESS CONTROL: grant the minimum role, document certification authority, and remove access when the relationship changes.

BEFORE CERTIFICATION

The Product Registry release gate

Do not certify or release a Reference key until every control below is documented.

1

Importer and responsible certifier are identified.

2

Collection ownership and privacy setting are correct.

3

Primary Product ID is supported by commercial evidence.

4

The record describes one materially consistent product.

5

Applicable citation and exclusion codes are current.

6

Manufacture date and actual facility match source records.

7

Every relied-upon lab is mapped to its tested citations.

8

Latest relevant test date and report trail are verified.

9

Trade Party records use the approved GLN or Alternate ID.

10

Certificate is Complete and certified by an authorized user.

11

Version ID is unique and the change reason is recorded.

12

Broker handoff contains the exact three-key and shipment match.

RELEASE ONLY THE APPROVED PRODUCT-CERTIFICATE-VERSION-ENTRY MATCH.

WORKING SOP

Broker handoff and post-certification change control

A repeatable six-step record trail prevents a valid certificate from becoming a stale filing key.



Minimum evidence record: source index, approved certificate export, three-key handoff, broker acknowledgment, entry/line reference, change log, and the person responsible for future reuse decisions.

WHEN PRODUCT OR CERTIFICATE FACTS CHANGE, STOP REUSE BEFORE CREATING OR SELECTING THE NEXT VERSION.

KEEP THIS GUIDE CURRENT

Official sources, article, and downloadable guide links

Product Registry screens, editing windows, templates, and technical behavior can change. Recheck current documents before filing.

[1]

CPSC Product Registry
Registration, sign-in, system status, and stand-alone repository notice.

[2]

Product Registry User Guide v3.0
Business Accounts, roles, privacy, entry, certification, versions, archive, export.

[3]

Product Registry FAQ v1.4
Access limits, corrections, version rules, archive, identifiers, security.

[4]

CPSC eFiling FAQ
Product IDs, component testing, certificate requirements, enforcement questions.

[5]

CSV Upload Guide v3
Partial imports, update behavior, new versions, trade parties, labs, field rules.

[6]

eFiling Document Library
Current templates, code lists, API, CATAIR links, guidance, and archives.

REGISTRY INTELLIGENCE WORKING LINKS
Full article - How to Use the CPSC Product Registry
Free CPSC eFiling PDF guide library

[CPSC eFiling Resource Center](#)
[Registry Intelligence - polandoc.com](#)

Editorial and legal note
Regulatory review: July 19, 2026. This guide is an independent educational and data-preparation resource. Registry Intelligence is not affiliated with, endorsed by, or operated by CPSC or CBP. It is not legal advice, customs brokerage, product testing, certification, account administration, or a government filing service. Official rules, current agency materials, and product-specific facts control.

Additional official references: CPSC eFiling CATAIR link [7]; Certificates of Compliance Final Rule [8]