

CPSC eFiling for Amazon Sellers

Private-Label Advanced Control Guide

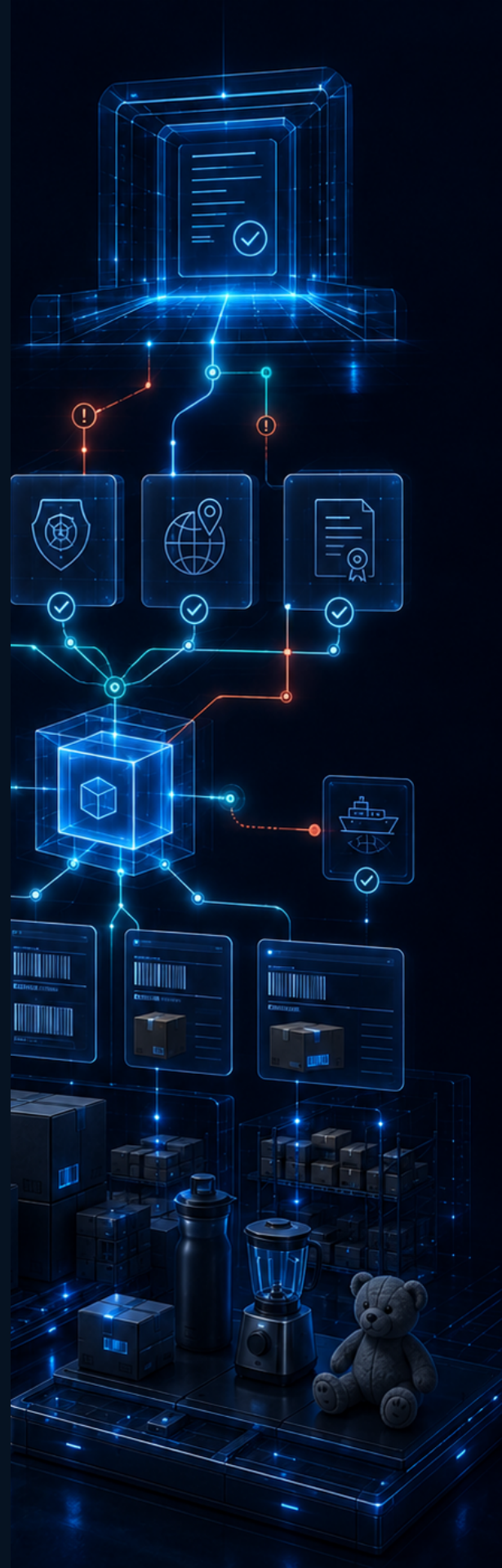
For U.S. marketplace sellers, private-label brands, importers, and compliance teams controlling product identity, testing evidence, Amazon requests, and customs eFiling.

32-PAGE ADVANCED FIELD GUIDE - JULY 2026

Full article: polandoc.com/cpsc-efiling-amazon-sellers/

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

Registry Intelligence: polandoc.com/



START HERE

Four systems must produce four separate proofs

A seller can pass one workflow and still fail the other three. Treat each destination as a separate controlled outcome.

PRODUCT

Physical compliance

The actual finished product and every compliance-relevant variant are supported by the correct tests, labels, warnings, and production facts.

CERTIFICATE

CPC or GCC

The responsible finished-product certifier issues one accurate certificate for the product and can produce the underlying records.

CUSTOMS

CPSC eFiling

The broker transmits a Full or Reference PGA Message Set for the correct entry line, product, and current certificate version.

MARKETPLACE

Amazon acceptance

Seller Central accepts the requested documents, attributes, images, or TIC verification for the affected ASIN under Amazon's current policy.

Proof of completion is different in each system: test package, issued certificate, ACE transmission result, and Amazon case or dashboard status.

NEVER USE AN AMAZON APPROVAL AS PROOF THAT THE CUSTOMS FILING OCCURRED.

Sources: 16 CFR 1110; CPSC eFiling FAQ; Amazon Seller Central [1][2][9]

QUESTION 01

Who is usually responsible in common Amazon selling patterns?

Responsibility depends on the actual import transaction. The table is a decision aid, not a substitute for the entry documents.

SELLING PATTERN	FIRST PARTY TO VERIFY	CONTROL QUESTION
Own brand; seller imports to FBA	Seller's legal entity if it is the IOR/importer	Does the entry identify that entity as importer and certifier?
Broker appears as IOR	Owner, purchaser, or consignee may be identified	Which responsible party will the PGA data name?
Foreign seller ships DTC/de minimis	Eligible owner, purchaser, consignee, or broker	Who can make entry and controls the commercial import?
Seller buys U.S.-landed inventory	Original importer for that import	Can the seller obtain the furnished certificate for the exact product?
Domestic private-label product	Private labeler unless manufacturer certifies	No ACE eFiling, but updated certificate rules still apply.

Do not infer the answer from the Seller Central account, FBA destination, invoice name, or brand trademark alone. Confirm the legal entity in the entry arrangement.

THE MARKETPLACE LOGIN DOES NOT ASSIGN THE FINISHED-PRODUCT CERTIFIER.

Sources: 16 CFR 1110.3, .7, .13; CPSC importer resources [1][3]

QUESTION 02

What identity file should exist before the first production order?

Create one legal-identity dossier so the same entity is not described differently across customs, CPSC, supplier, lab, and Amazon records.

01

LEGAL ENTITY

Exact registered name, address, email, phone, and responsible contact.

02

MARKETPLACE

Seller ID, store name, brand owner, ASIN owner, and authorized users.

03

IMPORT

Importer of Record number, owner/purchaser/consignee roles, broker, and bond data owner.

04

CPSC

Business Account, Certifier ID, Product Collections, certificate users, and certification authority.

05

SUPPLY CHAIN

Actual factory, trading company, sourcing agent, component suppliers, and laboratories.

06

AUTHORITY

Who may approve testing, issue the CPC/GCC, certify Registry records, and release data to the broker.

Maintain an approved-name table. Store aliases separately; do not silently substitute a store name, trademark, factory nickname, or freight-forwarder name for the legal party.

IDENTITY MISMATCHES SHOULD BE RESOLVED BEFORE DOCUMENTS ARE GENERATED.

QUESTION 03

Does Amazon's CPSC distributor decision make Amazon your importer?

No. The 2024 CPSC decision addressed recall responsibility for specified hazardous products sold through FBA. It does not rewrite the importer definition in Part 1110.

WHAT THE DECISION MEANS

CPSC determined that Amazon acted as a distributor for the products in that proceeding and required recall-remedy actions.

- The order concerned more than 400,000 specified products.
- The focus was notification, refunds, and removing hazardous products from consumers.
- It demonstrates that marketplace distribution can carry safety responsibilities.

WHAT IT DOES NOT PROVE

The decision does not establish that Amazon is the IOR or finished-product certifier for every third-party FBA shipment.

- Part 1110 still defines the importer from the entry relationship.
- FBA storage and fulfillment do not identify who issued the certificate.
- The seller must confirm the actual entry and PGA party mapping.

Treat the recall ruling and the eFiling rule as separate legal questions. A party can be a distributor for one purpose without becoming your certificate filer by assumption.

NEVER PUT 'AMAZON' IN THE CERTIFIER ROLE WITHOUT DOCUMENTARY SUPPORT.

QUESTION 04

What exactly is 'one product' for a marketplace catalog?

CPSC requires each certificate to describe only one product. Amazon's catalog hierarchy is not the certificate boundary.

PARENT ASIN

Merchandising group

A parent listing organizes choices but is not a purchasable physical item and does not prove common testing coverage.

CHILD ASIN

Sellable catalog item

A child ASIN may represent one product, but the physical model, materials, factory, and evidence still control.

CERTIFICATE

Regulated product boundary

Create a separate certificate for each unique product when a material design, process, component-source, or evidence change applies.

APPAREL

Narrow documented example

CPSC says same-material apparel styles, sizes, and colors may be one product when manufactured and tested together.

Write a short certificate-boundary rationale for every family. If the only rationale is 'Amazon put them under one parent,' the analysis is incomplete.

CATALOG RELATIONSHIPS DO NOT OVERRIDE PRODUCT FACTS.

QUESTION 05

How should ASIN, SKU, UPC, model, and Version ID be mapped?

A professional crosswalk distinguishes marketplace identity, commercial identity, CPSC product identity, and certificate state.

IDENTIFIER	WHAT IT IDENTIFIES	HOW TO CONTROL IT
ASIN	Amazon catalog record	Map to each sellable child; record parent separately.
Seller SKU	Seller-specific offer/inventory record	Useful CPSC ID type if stable and product-specific.
UPC / GTIN	Global trade item	Confirm it belongs to the exact product and packaging.
Model number	Manufacturer or brand model	Make it visible consistently on product, report, and certificate.
Primary Product ID	CPSC certificate anchor	Use one accepted ID type; keep value/type unchanged.
Version ID	Exact Registry certificate version	Send with Certifier ID and Product ID for Reference PGA.

Store the relationship as data, not inside filenames or staff memory. One ASIN can change; one certificate version must remain an auditable snapshot.

THE BROKER NEEDS THE PRODUCT VERSION, NOT THE AMAZON SHIPMENT LABEL.

QUESTION 06

Can an ASIN be used as the CPSC Primary Product ID?

CPSC allows an Alternate ID to be an alphanumeric identifier not represented by the other six types, but the operational choice must survive marketplace changes.

WHY IT CAN APPEAR TO WORK

An ASIN is alphanumeric and normally identifies an individual Amazon catalog item.

- Alternate ID is one of seven accepted CPSC ID types.
- An ASIN may be stored as an additional cross-reference.
- It can help Seller Central-to-certificate reconciliation.

WHY IT CAN BE A WEAK ANCHOR

Catalog merges, splits, suppressions, or relisting can change the marketplace relationship without changing the physical product.

- CPSC recommends an ID found on packaging, packing list, or invoice.
- A durable SKU, UPC, GTIN, or model may be easier at the border.
- Do not use a parent ASIN as the physical-product identifier.

Practical control: choose the most durable evidence-facing identifier as Primary Product ID, then keep ASINs in a separate marketplace crosswalk or additional-ID field when appropriate.

DO NOT LET A CATALOG EVENT BREAK THE CUSTOMS REFERENCE KEY.

QUESTION 07

What if Amazon granted a GTIN exemption?

A marketplace GTIN exemption only changes Amazon listing requirements. It does not remove CPSC's need for a product identifier on the certificate.

AMAZON

No UPC required for listing

The offer may be created without a standard product ID under Amazon's process.

CPSC

One accepted Product ID still required

Choose GTIN, UPC, SKU, model, serial, registered number, or a genuine Alternate ID.

PACKAGING

Make the chosen ID observable

Apply a stable SKU or model to product packaging, packing lists, or invoices when feasible.

DATA

Keep type and value honest

Do not label an ASIN as a UPC, combine several identifiers, or put product descriptions in the ID field.

The goal is not to manufacture a number for the template. The goal is to create a product key that customs, CPSC, the broker, and the seller can all reconcile.

GTIN EXEMPTION IS NOT A CERTIFICATE-IDENTITY EXEMPTION.

Sources: 16 CFR 1110.11; CPSC eFiling FAQ [1][2]

QUESTION 08

Can every child ASIN share the same testing and certificate?

Run this material-change test before combining variants. A 'yes' answer does not automatically prove separate treatment, but it requires documented review.

MATERIAL OR COATING

1 Different polymer, fabric, paint, dye, finish, or supplier?

COMPONENT

2 Different battery, magnet, small part, fastener, filling, or electronics?

DESIGN OR SIZE

3 Could geometry, strength, access, age use, or hazard exposure change?

FACTORY OR PROCESS

4 Different production site, method, tooling, or quality control?

AGE AND MARKETING

5 Different age grade, intended use, warnings, or product-page claims?

EVIDENCE

6 Different rules, labs, exclusions, test dates, or sample descriptions?

IDENTITY

7 Can each physical variant be matched unambiguously to the report?

PRODUCTION

8 Were the items manufactured and tested together where that matters?

Document the answer, evidence reviewed, reviewer, date, and resulting certificate boundary. Revisit it whenever a supplier or listing changes.

VARIANT COVERAGE MUST BE PROVED FROM THE PRODUCT OUTWARD.

QUESTION 09

How should one ASIN produced at multiple factories be controlled?

A stable listing can hide changing manufacture places, processes, components, and test relationships. Build the factory decision before purchase orders are released.

- 01

FREEZE FACTORY

Record the actual production site, not the trading company or export agent.
- 02

SEPARATE LOTS

Assign factory and production-run identifiers that survive carton consolidation.
- 03

COMPARE PRODUCT

Check design, materials, components, tooling, process, and labels across sites.
- 04

COMPARE EVIDENCE

Verify which reports, labs, citations, and component records support each site.
- 05

DECIDE CERTIFICATE

Determine whether a distinct product record or new version is required for the changed facts.
- 06

MAP ENTRY

Ensure each entry line and broker handoff points to the supported product/version.

The Product Registry CSV identifies a manufacturer trade party for each record. Never use one generic supplier identity to conceal multiple physical factories.

SAME ASIN DOES NOT MEAN SAME MANUFACTURE PLACE.

QUESTION 10

What must be collected before final factory payment?

Use a documentary release gate. A generic 'CE/FCC/CPSC certificate' email is not an evidence package for U.S. CPSC certification.

1

PRODUCT MASTER

Controlled specification, models, materials, components, dimensions, age, photos.

2

FACTORY MASTER

Legal name, complete site address, phone, email, and stable identifier.

3

PRODUCTION

Month/year, start/end dates where used, lot/batch, and packing-list link.

4

TEST PACKAGE

Complete signed reports, sample photos, methods, values, dates, and amendments.

5

LABORATORIES

Legal identity and CPSC acceptance/scope where children's testing applies.

6

RULE MAP

Every applicable citation, test, exclusion, lab, and supported product relationship.

7

LABEL EVIDENCE

All product and packaging sides, tracking labels, warnings, instructions.

8

RECORD ACCESS

Named responsive custodian and contractual access to supporting files.

Tie the final payment milestone to delivery and acceptance of the structured package. Missing data is far more expensive after cargo leaves the factory.

DO NOT RELEASE GOODS ON A SCREENSHOT OF A REPORT COVER PAGE.

Sources: 16 CFR 1110.11, .17; 16 CFR 1109.5 [1][13]

QUESTION 11

How do you audit a supplier test report before relying on it?

A passing conclusion is the last thing to review, not the first. Test the report's identity, scope, and traceability against the production product.

01
AUTHENTICITY

Verify report number, issuer, complete pages, signatures, amendments, and direct source.

02
SAMPLE IDENTITY

Match brand, model, photos, dimensions, materials, colors, and components.

03
FACTORY LINK

Confirm the tested sample is traceable to the actual production product and site.

04
RULE COVERAGE

Map every cited requirement to method, result, and the product/component tested.

05
LAB SCOPE

For children's products, verify CPSC acceptance includes each required test scope.

06
PRODUCTION DELTA

Resolve every difference introduced after sampling: material, supplier, design, or label.

Record exceptions instead of editing the PDF. A due-care memo should state what was checked, what remains unresolved, and why the evidence can or cannot support certification.

DUE CARE DOES NOT PERMIT WILLFUL IGNORANCE.

QUESTION 12

Is an Amazon-approved TIC the same as a CPSC-accepted laboratory?

No. The two designations serve different systems and must be verified independently for the exact service performed.

CPSC-ACCEPTED LAB

For children's product certification testing, the laboratory must be accepted by CPSC and its accreditation scope must include the applicable required tests.

- Check the CPSC laboratory database and scope.
- Match the report issuer and testing location.
- Acceptance is about federal certification testing.

AMAZON-APPROVED TIC

Amazon may direct toy sellers to an approved Testing, Inspection, and Certification provider for annual testing or document verification.

- Select the provider through the current dashboard workflow.
- The provider may test samples or verify existing documents.
- Approval is about Amazon's marketplace process.

A provider can participate in both systems only if the relevant facility and scope satisfy CPSC requirements and Amazon accepts it for the requested workflow. Verify both; never infer one from the other.

ONE BADGE CANNOT BE USED AS PROOF OF THE OTHER.

Sources: 16 CFR 1109.4(l); CPSC lab search; Amazon toy TIC announcement [7][10][13]

QUESTION 13

Does Amazon's annual toy verification require a new CPSC version?

The answer depends on what actually occurred. Amazon's marketplace cadence and CPSC certificate-version facts are separate.

EVENT	CPSC EFFECT	AMAZON EFFECT
Existing documents verified	No new test occurred solely because a TIC reviewed records	May satisfy annual verification if Amazon accepts it
New product testing	Update testing data and create the required new certificate version	Submit through the requested TIC workflow
Product/factory changed	Reassess rules, evidence, product boundary, and version	Existing ASIN approval may not cover the changed item
Same old inventory	Federal certificate analysis follows actual product and records	Amazon may still require its annual marketplace action
Amazon request misclassified	Does not change federal applicability by itself	Use Amazon's appeal route with product facts

CPSC's Product Registry FAQ uses annual retesting as an example of when testing information moves from V1 to V2. Document verification alone is not retesting.

TRACK THE EVENT: TEST, VERIFY, CHANGE, OR APPEAL.

Sources: Product Registry FAQ v1.4; Amazon toy TIC announcement [5][7]

QUESTION 14

What should you do when Amazon asks for the same documents again?

Do not respond from memory or overwrite the old submission. Build a controlled case history and determine whether the request, policy, or product scope changed.

- 01

CAPTURE REQUEST

ASIN, request type, exact wording, due date, dashboard path, and screenshots.
- 02

PRESERVE HISTORY

Previous submission files, dates, status, case IDs, and approval or rejection messages.
- 03

COMPARE SCOPE

Is this the same ASIN, marketplace, product version, rule set, and verification year?
- 04

COMPARE POLICY

Did the route move to Account Health or an approved TIC verification workflow?
- 05

SUBMIT DELTA

Provide the requested current evidence without silently changing product facts.
- 06

ESCALATE CLEANLY

One concise chronology, evidence index, exact discrepancy, and requested resolution.

Amazon announced migration of product and food safety compliance to Account Health/Policy Compliance and a separate TIC process for children's toys. Follow the current ASIN-specific instruction.

A DUPLICATE REQUEST MAY BE A NEW WORKFLOW, NOT A DUPLICATE FACT PATTERN.

Sources: Amazon Account Health and toy TIC announcements [7][8]

QUESTION 15

Why can a legally supportable CPC still be rejected by Amazon?

Marketplace rejection does not automatically prove the certificate is legally invalid. First isolate the document-to-listing mismatch.

ENTITY

1

Seller/company, importer, certifier, report client, or brand names do not reconcile.

PRODUCT

2

Model, ASIN, SKU, UPC, photos, color, size, or style cannot be matched.

SCOPE

3

Report or CPC omits an ASIN, variant, rule, warning, or requested product class.

LAB / TIC

4

CPSC acceptance, scope, Amazon-approved provider, or verification route is wrong.

RECENCY

5

Amazon's current category policy may request newer testing or annual verification.

LABELS

6

Tracking label, warning, compliance marking, manual, or packaging image is missing.

FILE

7

Pages are missing, unreadable, edited, inconsistent, or not the requested document type.

CLASSIFICATION

8

Amazon placed the ASIN in a product class the seller believes is inapplicable.

Fix the proven mismatch. Do not rewrite a certificate merely to imitate Amazon terminology if the underlying legal party or product facts would become inaccurate.

KEEP AMAZON ACCEPTANCE AND CPSC VALIDITY AS TWO SEPARATE FINDINGS.

QUESTION 16

Can the factory issue the CPC or GCC for an imported private-label product?

The importer is the finished-product certifier for covered products manufactured outside the United States, except where a more specific rule provides otherwise.

WHAT THE SUPPLIER CAN PROVIDE

A factory, component supplier, or other party may procure testing, issue voluntary supporting certifications, and provide records.

- Finished-product or component test reports.
- Component-part certificates and traceability records.
- Factory, production, label, and product specifications.

WHAT THE IMPORTER MUST CONTROL

The importer issues the finished-product certificate and remains legally responsible for its validity, accuracy, completeness, and availability.

- Exercise due care before relying on another party.
- Obtain the required underlying documentation.
- Ensure the certificate and eFiled data match the product.

Do not treat a supplier document titled 'CPC' or 'GCC' as a substitute automatically. Determine whether it is supporting evidence and then issue the correct finished-product certificate through the responsible importer.

RELIANCE DOES NOT TRANSFER LEGAL RESPONSIBILITY.

Sources: 16 CFR 1110.7, .15; 16 CFR 1109.5 [1][13]

QUESTION 17

What if the test report client is the supplier, not the seller?

A different report client is not automatically fatal under CPSC's reliance framework, but the importer must prove traceability, due care, and record access. Amazon may apply separate document criteria.

IDENTITY

Explain the relationship

Document supplier, factory, testing party, brand, importer, and exact product connection.

AUTHORITY

Obtain lawful access

Keep the complete report and the supplier's authorization or evidence that the importer may rely on it.

RACEABILITY

Match the tested sample

Link model, photos, components, lot/batch, factory, and production product without unexplained gaps.

PLATFORM

Prepare for Amazon review

Seller Central may still require a named TIC route, ASIN-specific evidence, or other current marketplace documentation.

Create a reliance memo. It should explain why the evidence supports this importer and this production product, not merely state that the supplier 'said it is okay.'

THE NAME DIFFERENCE MUST BE EXPLAINED, NOT ERASED.

QUESTION 18

When the ASIN stays the same, what changes must stop certificate reuse?

Run a controlled delta review before the next purchase order, shipment, or Reference PGA handoff.

DESIGN

1

Shape, dimensions, construction, safety features, intended function.

MATERIAL

2

Resin, fabric, metal, wood, coating, paint, dye, adhesive, filling.

COMPONENT

3

Battery, magnet, cord, fastener, electronics, small part, supplier source.

FACTORY

4

Production site, tooling, process, subcontractor, assembly location.

USER

5

Age grading, intended consumer, warnings, instructions, marketing claims.

RULE

6

New or changed federal rule, ban, standard, citation, or exclusion.

TEST

7

New testing, changed lab, sample, method, date, report, or failed result.

LABEL

8

Tracking label, model, packaging, identification, or warning changes.

Classify every delta as no certificate effect, certificate-data update, new version, new product review, or testing/applicability escalation. Keep the signed review with the product master.

ASIN CONTINUITY IS NOT PRODUCT CONTINUITY.

QUESTION 19

When should a new Product Registry Version ID be created?

Use the event and Registry state, not an arbitrary annual counter. CPSC's documented grace-period behavior also matters.

EVENT	VERSION TREATMENT	CONTROL
New testing performed	Create/update the certificate with new testing data	Use a new Version ID after the applicable edit window
Amazon verifies old documents only	No automatic CPSC version solely for review	Confirm certificate facts truly remain identical
Certified record within grace period	May edit same version, then re-certify	Grace ends if a Reference PGA is filed
Certified record after grace period	Create a new certificate version	Never overwrite historical state
Factory/material/product change	Reassess product and evidence first	New version may be insufficient if it is a new product

Version IDs are unique per Primary Product ID at Business Account level. Maintain a version ledger so Amazon events, tests, production changes, and broker handoffs are not confused.

NEW VERSION IS A RESULT OF CHANGED CERTIFICATE FACTS, NOT A COSMETIC RENAME.

Sources: Product Registry FAQ v1.4; CSV Upload Guide v3 [5][6]

QUESTION 20

How should component-part testing be carried into the finished-product certificate?

Component evidence must remain traceable to the finished product and to each rule it supports. The component certificate itself is not eFiled as the imported finished product.

01
COMPONENT

Identify material/component, supplier, lot/batch, and finished-product use.

02
TESTING PARTY

Record who procured the test and every laboratory that conducted it.

03
RULE

Map each test or exclusion to the exact applicable citation it supports.

04
TRACEABILITY

Prove the production component is identical in all material respects.

05
FINISHED PRODUCT

Confirm assembly or later processing cannot introduce noncompliance.

06
CERTIFICATE DATA

Include all relied-upon labs, most recent testing, citations, and records contact.

If a finished-product method is required, component testing cannot replace it. Resolve doubt in favor of testing the finished product, as Part 1109 directs.

A REPORT FOLDER IS NOT A COMPONENT-TO-RULE TRACEABILITY MAP.

QUESTION 21

Which dates belong to manufacture, testing, and shipment?

Amazon sellers often substitute whichever date is available. Each date answers a different compliance question.

MANUFACTURE

Month and year of production

Use the actual production run. For a run over several days, the rule calls for the initial manufacture date at minimum.

TEST

Most recent supporting testing

Use the date tied to the actual testing evidence, not the report issue or Amazon submission date.

LOT / BATCH

Traceability connector

Link factory records, tested components, finished goods, cartons, invoices, and affected units.

ENTRY

Customs transaction timing

The eFiled data must accompany the entry; mailed covered products require Registry data before U.S. arrival.

Purchase-order, deposit, inspection, invoice, sailing, FBA appointment, and listing dates are operational dates. They should never be substituted for manufacture or test dates.

DATE FIELDS MUST COME FROM THEIR SOURCE RECORDS.

QUESTION 22

What changes when the seller buys inventory already imported into the U.S.?

A domestic resale transaction is not a second import filing. The seller still needs product-compliance evidence and must not sell recalled or noncompliant goods.

FOR THE ORIGINAL IMPORT

The original importer was responsible for the certificate and eFiling connected to that entry.

- Obtain the certificate furnished through the distribution chain.
- Match the exact model, lot, version, and product facts.
- Retain invoice and supplier-chain evidence.

IF THE SELLER LATER IMPORTS

The seller's role changes when it becomes the party importing the next shipment.

- Re-establish IOR and certifier identity.
- Do not reuse a distributor's certificate blindly.
- Create the correct eFiling and broker handoff for the new entry.

Amazon may request documents from the current seller even when another party imported the goods. Marketplace responsibility to answer the request is not proof of original import responsibility.

DISTINGUISH WHO IMPORTED FROM WHO IS SELLING NOW.

Sources: 16 CFR 1110.13(b); CPSC eFiling FAQ on resale/used products [1][2]

QUESTION 23

How do dropshipping, DTC, mail, and Section 321 affect eFiling?

Low value, one-unit shipments, or direct delivery do not create a general certification exemption for commercial marketplace sales.

FLOW	FEDERAL RESULT	OPERATIONAL ACTION
Foreign supplier -> consumer	Commercial online sale; determine eligible importer	Assign product/certificate data before fulfillment
Section 321 / de minimis	No eFiling exemption for products requiring certification	Build a filing method for the entry type
Imported by mail	Enter required certificate data in Product Registry before arrival	Do not wait for delivery or listing review
Consumer gift/personal effects	Narrow noncommercial exception may apply	Verify facts; marketplace sale is commercial
FBA replenishment	Normal import analysis still applies	Map every regulated line to the correct certificate

A Reference PGA Message Set requires an entry and cannot simply be attached to a manifest. Coordinate the actual transmission method with the broker/carrier and current CBP/CPSC guidance.

SMALL SHIPMENT DOES NOT MEAN SMALL COMPLIANCE OBLIGATION.

Sources: 16 CFR 1110.3, .13; CPSC eFiling FAQ [1][2]

QUESTION 24

Full or Reference PGA for an Amazon catalog?

Choose by certificate stability and operating model. Neither route makes Amazon the filer, and the Product Registry does not transmit to ACE automatically.

FULL PGA MESSAGE SET

Broker files the seven required certificate data elements for the imported product at entry.

- Useful when Registry reuse is not the operating model.
- Importer still must validate every data element.
- Product Registry is not required for Full PGA filing.

REFERENCE PGA MESSAGE SET

Importer pre-enters and certifies the full record, then provides Certifier ID, Product ID, and Version ID.

- Efficient for repeated identical certificate details.
- Old versions must stop when facts change.
- Broker still transmits the three identifiers in ACE.

For private-label catalogs with repeat imports, Reference PGA can reduce repeated entry data only when change control is strong. A fast-changing supplier base may erase the expected benefit.

CHOOSE THE ROUTE FROM DATA STABILITY, NOT FROM CATALOG SIZE ALONE.

QUESTION 25

How should a mixed FBA shipment be handed to the broker?

A shipment ID, carton plan, or purchase order can contain several regulated products and certificate versions. The broker needs an entry-line crosswalk.

01

ENTRY LINE

Broker line number, HTS, product description, quantity, and country.

02

MARKETPLACE

Child ASIN, seller SKU, FNSKU where used, and FBA shipment reference.

03

PRODUCT

Primary Product ID/type, model, UPC/GTIN, factory, and manufacture run.

04

CERTIFICATE

CPC/GCC, current Version ID, citations, test date, and records contact.

05

FILING

Full seven elements or Reference Certifier/Product/Version identifiers.

06

ACKNOWLEDGMENT

Broker confirms accepted mapping, files the message, and returns transmission evidence.

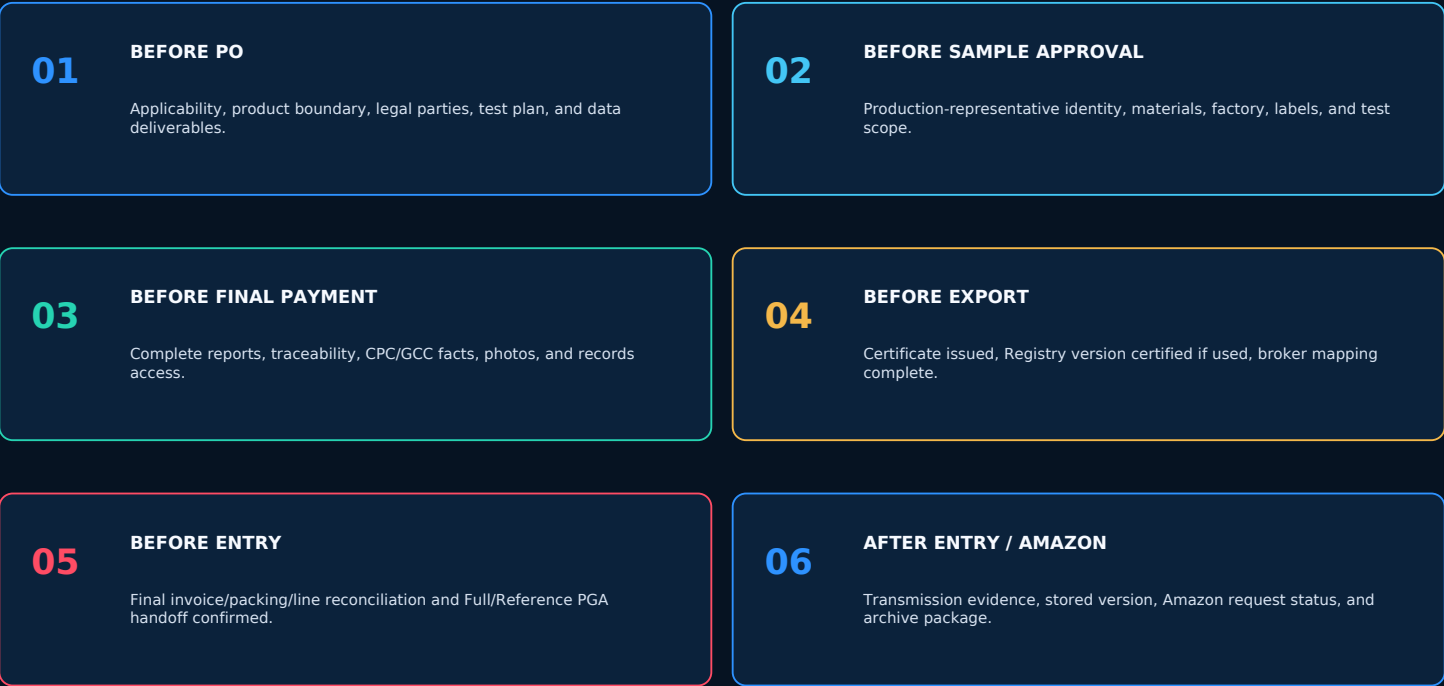
Freeze the crosswalk at commercial-invoice release. Any carton, quantity, supplier, model, or version change must trigger a controlled update before entry filing.

NEVER SEND ONE REFERENCE KEY FOR AN UNRECONCILED MIXED CATALOG.

QUESTION 26

Where should the seller place go/no-go gates?

The cheapest failure is the one stopped before goods, listings, and entry documents diverge.



Each gate needs an owner, evidence list, pass/fail result, unresolved issue log, and explicit release authority. 'Supplier says compliant' is not a gate result.

NO SHIPMENT SHOULD MOVE ON AN UNRESOLVED PRODUCT-IDENTITY DELTA.

QUESTION 27

What belongs in an Amazon listing-removal evidence packet?

Build one case packet that a reviewer can follow without opening unrelated folders or guessing which model the documents cover.

CASE COVER

1 ASIN, SKU, marketplace, request, deadline, case ID, exact requested outcome.

PRODUCT INDEX

2 Models/variants included, parent-child map, images, labels, warnings, manuals.

CERTIFICATE

3 Current CPC/GCC with product, certifier, rules, dates, labs, and records contact.

TEST INDEX

4 Report numbers, labs, scope, dates, product/variant coverage, complete files.

IDENTITY NOTE

5 Explain seller, brand, importer, supplier, factory, and report-client relationships.

TIC STATUS

6 TRF/request reference, provider, quote, samples/documents, current verification status.

CHRONOLOGY

7 Every submission, message, approval/rejection, and action in time order.

APPEAL

8 If misclassified, concise product facts and official basis - not a generic denial.

Keep CPSC eFiling evidence in the operational file, but do not claim that an ACE submission proves Amazon policy compliance or that Amazon approval proves federal filing.

ONE INDEXED PACKET IS STRONGER THAN TEN UNEXPLAINED ATTACHMENTS.

QUESTION 28

Who should own the data and records when outside providers are used?

A laboratory, sourcing agent, consultant, broker, or marketplace service provider may perform tasks, but the finished-product certifier remains responsible.

ACCOUNT

Importer-controlled access

Keep the Product Registry Business Account, administrators, role inventory, and offboarding process under the responsible company.

RECORDS

Five-year retention

Maintain certificates and supporting test/traceability records for at least five years from certificate creation.

EXPORT

Portable source package

Require complete data/report exports, identifiers, version history, and evidence indexes from every provider.

CONTINUITY

No single-person dependency

Name a responsive records custodian, backup owner, escalation route, and tested recovery process.

Provider contracts should address record delivery, corrections, ownership, confidentiality, retention, account exit, and access after the commercial relationship ends.

OUTSOURCED WORK MUST NOT BECOME OUTSOURCED CONTROL.

Sources: 16 CFR 1110.15-.17; Product Registry User Guide v3 [1][4]

PREPARATION

What should an app-ready Amazon seller data package contain?

The future CSV Builder & Validator can check and format supported source data. It cannot decide unsupported legal facts, invent testing, or certify the product.

PRODUCT MASTER

Stable product facts, Primary ID, model, materials, variants, factory, manufacture run.

CATALOG CROSSWALK

Parent/child ASIN, seller SKU, UPC/GTIN, model, FNSKU, and product-version relationship.

TRADE PARTIES

Importer/certifier, manufacturer, labs, record custodian, broker, identifiers, contacts.

EVIDENCE MAP

Citation -> test/exclusion -> lab -> report -> component/finished product -> supported variant.

VERSION LEDGER

Product change, test event, certificate issue, Registry Version ID, status, broker use.

ENTRY HANDOFF

Commercial invoice line, HTS decision owner, Full/Reference selection, broker identifiers.

Native next step: validate the seller's confirmed source data, surface missing and inconsistent fields, and prepare a controlled Product Registry CSV without changing the underlying facts.

Open the CPSC eFiling CSV Builder & Validator

SOFTWARE CAN VALIDATE DATA STRUCTURE; THE RESPONSIBLE PARTY MUST VALIDATE THE FACTS.

FINAL CONTROL

Launch checklist and authoritative links

Use this page before releasing production, certifying a Registry record, sending the broker identifiers, or answering an Amazon request.

- Physical product and every variant match the tested and documented configuration.
- Importer of Record, finished-product certifier, brand owner, seller, and broker roles are documented.
- Each certificate describes one supported product and includes every applicable rule and relied-upon lab.
- CPSC-accepted laboratory scope and Amazon-approved TIC workflow were verified separately where applicable.
- Primary Product ID and ASIN/SKU/UPC/model crosswalk are durable and unambiguous.
- Current Version ID reflects the latest supported certificate facts and has not been superseded.
- Every entry line maps to the correct Full or Reference PGA data and the broker confirmed transmission.
- Amazon case status is recorded separately from certificate validity and customs eFiling status.

AUTHORITATIVE SOURCES

- 16 CFR Part 1110
- 16 CFR Part 1109
- CPSC eFiling FAQ
- Importer Resources
- Document Library
- Product Registry
- CPSC Lab Search
- CPC Guidance
- GCC Guidance
- Amazon Toy TIC Notice
- Amazon Account Health Notice
- Full Article
- All Free PDF Guides
- Resource Center

Independent educational resource. Verify current CPSC, CBP, Amazon, product-specific, and entry-specific requirements. This guide is not legal advice, product testing, certification, brokerage, or an official filing service.

FINAL RULE: RELEASE ONLY WHEN PRODUCT, EVIDENCE, CERTIFICATE, ENTRY, AND MARKETPLACE RECORDS AGREE.

Regulatory review: July 19, 2026. Verify current official instructions before use.