

CPSC eFiling CSV Bulk Upload

Advanced Validation and Recovery Guide

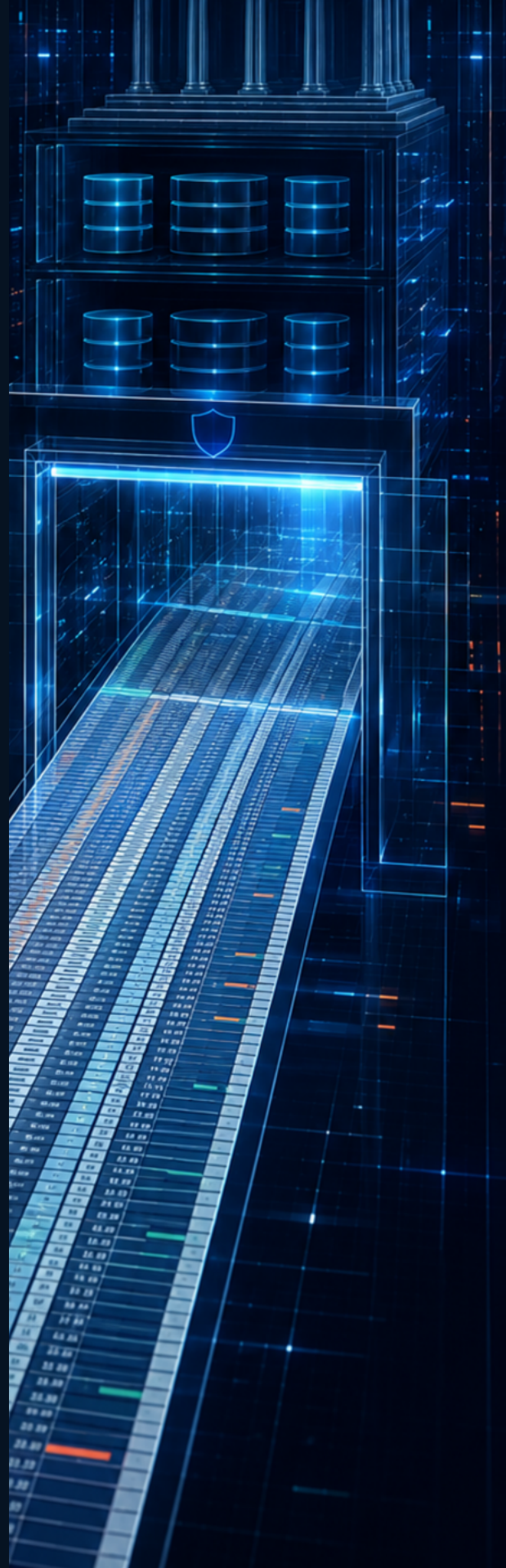
For U.S. importers preparing high-volume Product Registry files:
field dependencies, Registry state, trade-party reuse, laboratory
mapping, partial imports, and controlled recovery.

ADVANCED OPERATIONAL FIELD GUIDE - JULY 2026

Full article: polandoc.com/cpsc-efiling-csv-template/

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

Registry Intelligence: polandoc.com/



START HERE

Why a valid-looking CSV can still fail

The CSV is only the transport layer. Five control layers must agree before a row becomes a usable certificate record.



CONTROL PRINCIPLE: passing the parser does not prove that the certificate facts, relationships, or version are correct.

Sources: Official Bulk Upload Template v3; CSV Upload Guide v3; Product Registry User Guide v3 [1]-[3]

QUESTION 01

Which official source controls when documents do not align?

CPSC publishes several files for different channels. Treating them as one interchangeable specification creates false rules.

CSV MECHANICS

Template v3 + CSV Upload Guide v3

REGISTRY STATE

Product Registry Guide + FAQ

CITATION VALUES

Current code list + citation guidance

API DIAGNOSTICS

API Specification v4 + error dictionary

DOCUMENTED MISMATCH

The CSV guide uses NOL for testing exclusions, while the API model stores exclusions separately. Field limits also differ in places. Apply the rule for the channel being used; do not merge specifications silently.

- Record the version and date of every official file used for the batch.
- If an unresolved conflict changes submitted data, use a controlled test batch or contact CPSC eFiling Support.

DO NOT INVENT A RULE TO MAKE DIFFERENT OFFICIAL DOCUMENTS LOOK CONSISTENT.

QUESTION 02

What is actually flattened into one 83-column row?

One data row is a certificate record, but its fields represent several related entities and repeating laboratory records.

OFFICIAL TEMPLATE V3 - 83 COLUMNS



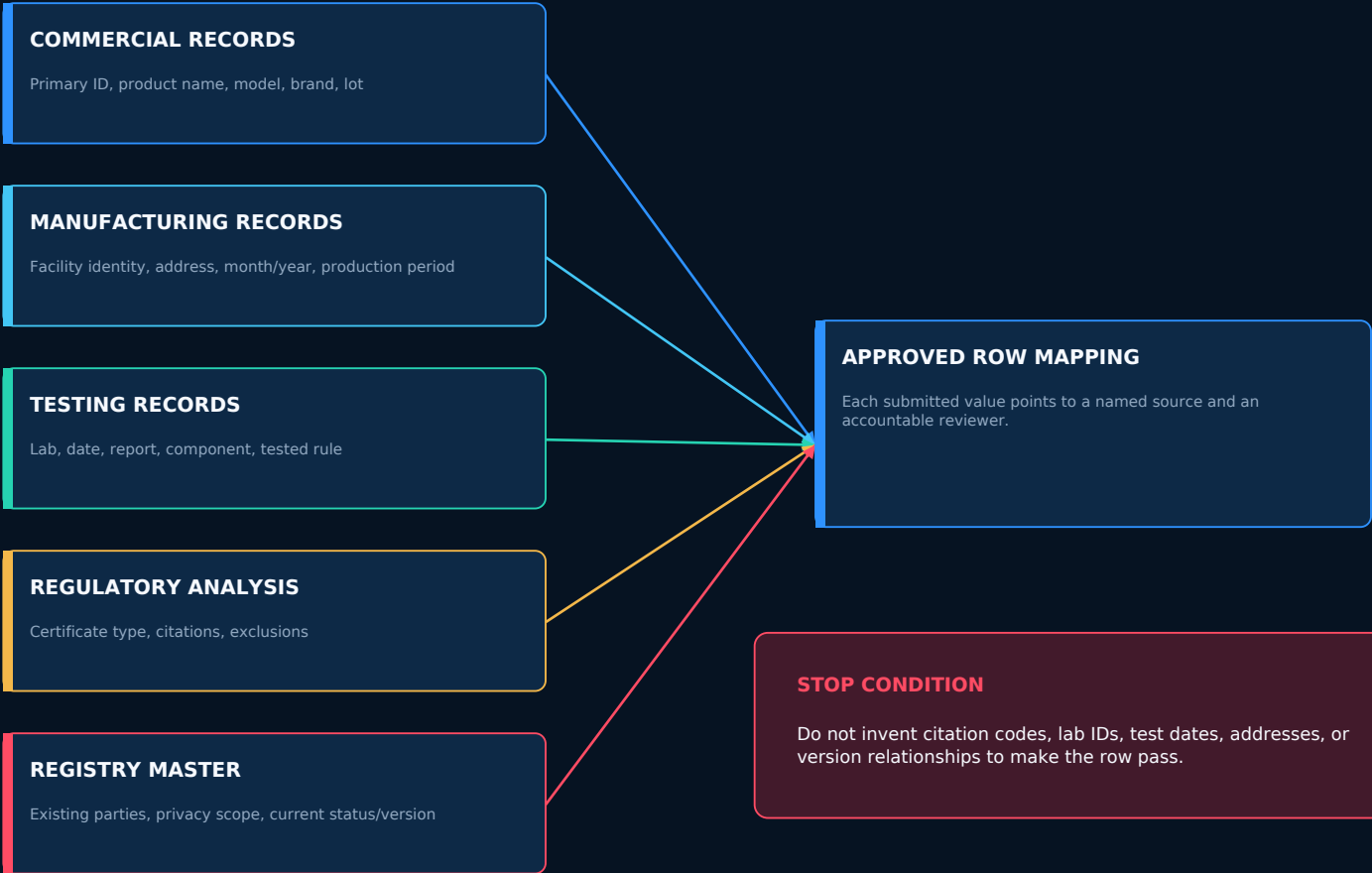
18	PRODUCT AND VERSION	Update flag, current/new version, primary and additional IDs, certificate type
15	MANUFACTURER	Identifier, new-party directive, legal identity, address, contact, manufacture date
4	PRODUCTION	Production dates and lot pair
32	LABORATORIES	Type, identity, citations, report references, component fields, last test date
14	RECORDS CONTACT	POC type, identifier, new-party data

ROW BOUNDARY: do not combine products whose certificate facts are not materially identical.

QUESTION 03

What must exist before the spreadsheet is populated?

A missing fact is an evidence problem, not an empty-cell problem. Build the source map before mapping columns.



DATA LINEAGE: every material CSV value should be traceable to evidence or an approved Registry record.

Sources: CSV Upload Guide v3, pp. 6-10; CPSC eFiling FAQ [2][6]. Mapping controls are Registry Intelligence recommendations.

QUESTION 04

Which defect blocks the file, and which defect blocks one row?

The recovery path depends on whether the parser rejects the header contract or the Registry rejects individual certificate data.

FILE LEVEL

The upload cannot proceed

A required column header is missing, renamed, or structurally invalid. Correct the controlled header row before reviewing product data.

- Do not rename standard headers for internal convenience.
- Delete all three example rows before loading production data.

ROW LEVEL

Specific records return errors

The required header exists, but one row has a blank, invalid, conflicting, or unresolved value. Valid rows may still be eligible for import.

- Preserve the source row ID outside the CPSC file for reconciliation.
- Correct the original working file, then create a new CSV export.

HEADER PRESENT DOES NOT MEAN VALUE OPTIONAL

Required, contingent, and optional status must be evaluated independently for every row. A contingent value becomes mandatory when its trigger is true.

RECOVERY RULE: identify the scope of the failure before editing any data.

QUESTION 05

What can Excel silently change before the CSV is saved?

The visible workbook is not the final evidence. Inspect the exported CSV as literal text before upload.

LEADING ZEROS	001234567890	1234567890
---------------	--------------	------------

SCIENTIFIC NOTATION	1234567890123	1.23457E+12
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DATE CONVERSION	04/10	4/10/2026
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COMMA PARSING	Company, LLC	EXTRA CSV FIELD
---------------	--------------	-----------------

WRONG MULTI-VALUE DELIMITER	1215; 1216	1215, 1216
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SAFE WORKFLOW: keep a canonical source file, create a dated upload copy, preserve identifier/date columns as text, export CSV, and inspect headers, row count, delimiters, quotes, blank rows, and literal values.

CPSC CURRENTLY INSTRUCTS USERS TO REMOVE COMMAS FROM VALUES AND USE SEMICOLONS FOR MULTIPLE VALUES.

QUESTION 06

How can citation code 4.10 become 4.1?

Some values in the official code workbook depend on spreadsheet display formatting. Automated conversion can erase significant characters.



WHY THIS MATTERS

Citation and testing-exclusion codes can contain decimals, parentheses, letters, and other special characters. They are identifiers, not quantities. The literal code in the final CSV must match the current official list.

- Load citation and exclusion codes into the working system as text strings.
- Compare the final CSV token to the official displayed code, not to an imported numeric value.
- Preserve parentheses and other characters exactly; do not normalize them as punctuation.
- Refresh the code list independently from the CSV template because CPSC may revise them on different dates.

IDENTIFIER RULE: citation codes must never pass through numeric arithmetic or locale conversion.

QUESTION 07

How should product identifiers be protected in a bulk file?

The Primary Product ID anchors the Reference key and the update lookup. Additional IDs support matching but do not replace it.



- Use an identifier found on packaging, invoice, or packing list whenever possible.
- Do not duplicate the Primary Product ID type in the corresponding optional additional-ID column.
- Store every identifier as text so leading zeros, hyphens, and long values survive export.
- Do not place descriptions, supplier notes, or multiple identifiers into Alternate Identifier.

A wrong Primary Product ID is not a cosmetic error. It changes the certificate key and may prevent the intended update from finding the existing record.

KEY CONTROL: freeze the Primary Product ID and its declared type before the first production upload.

QUESTION 08

Is the row new, an update, or a new certificate version?

The answer depends on Registry status and timing, not only on the Product Update value.

INTENT	UPDATE?	CURRENT ID	NEW ID	RESULT
NEW CERTIFICATE	N	BLANK	UNIQUE	Create new record
EDIT CURRENT	Y	MATCH	SAME OR NEW	Update current record
NEW VERSION	Y	MATCH	UNIQUE	Stack a new version

STATE OVERRIDES INTENT

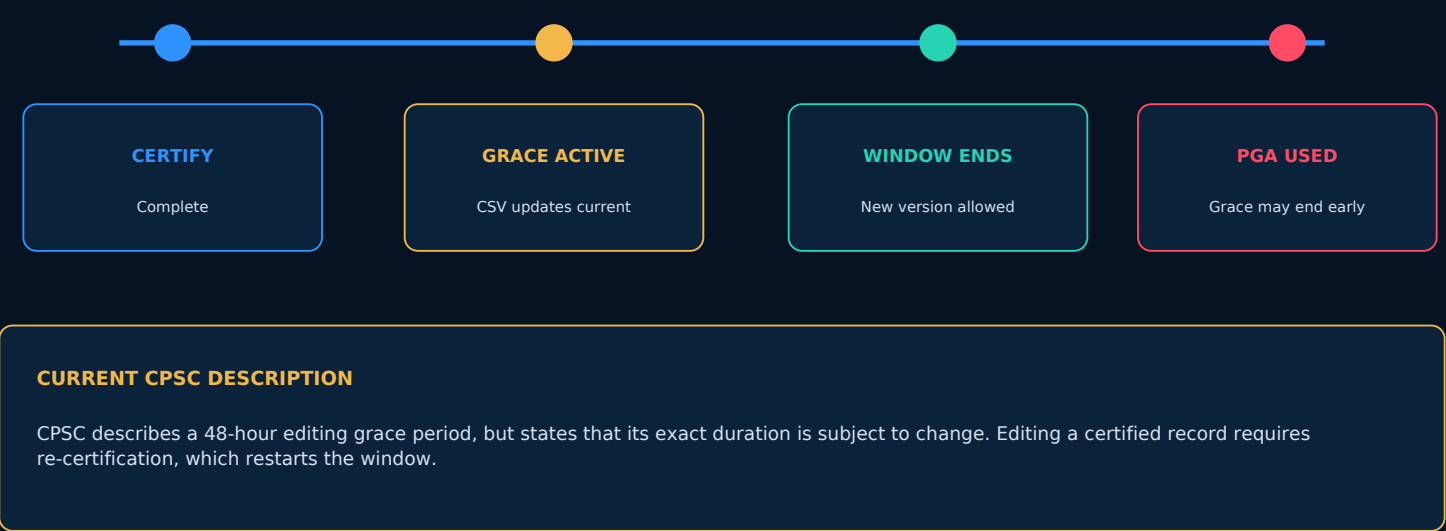
Incomplete, Awaiting Certification, or Complete-with-grace records are updated in place. A new version through CSV requires the existing certificate to be Complete and outside its active editing grace period.

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

QUESTION 09

Why can a new Version ID fail to create a new version?

During the current editing grace period, CSV behavior treats the upload as an update to the current certificate.



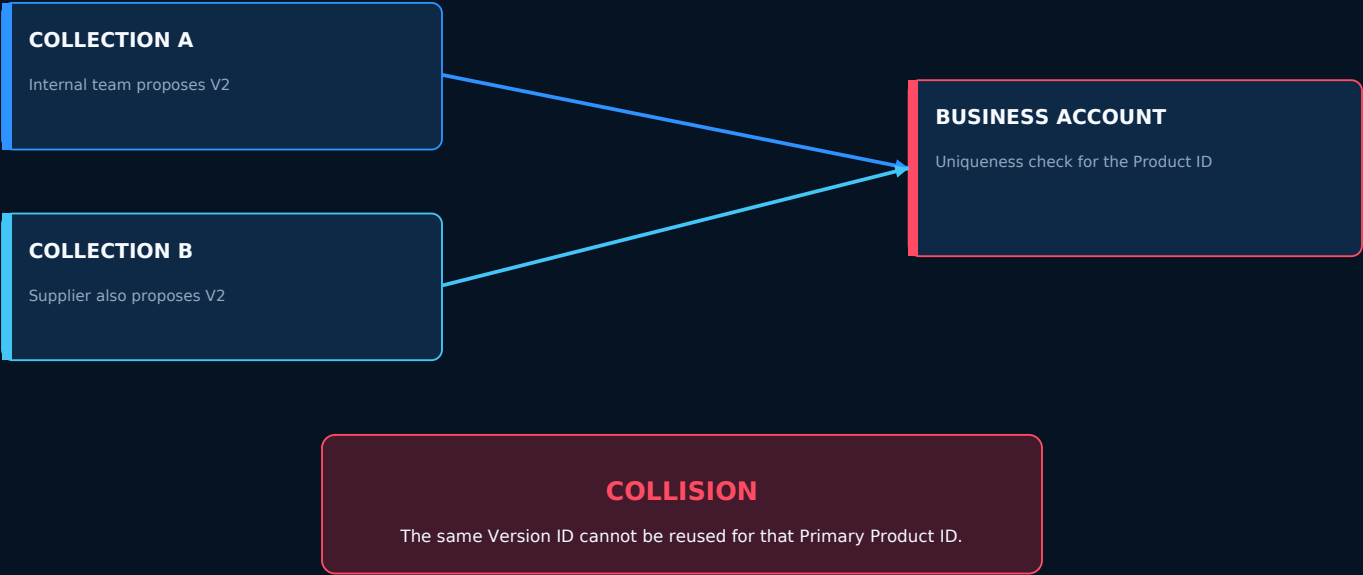
- Capture status, certification time, Current Version ID, and intended result before preparing the update row.
- Do not infer success from the New Version ID alone; verify the resulting Registry record after import.

VERSION CONTROL: verify the Registry state both before and after the CSV import.

QUESTION 10

How do multiple teams avoid Version ID collisions?

Uniqueness is enforced for each Primary Product ID across the Business Account, even when teams work in different collections.



- Maintain one account-wide Version ID register, not separate registers for each collection.
- Reserve IDs before generating the CSV; record Product ID, version, status, batch, change reason, and owner.
- Use stable row and batch references outside the CPSC fields so failed rows can be reconciled without changing keys.

CONCURRENCY CONTROL: VERSION ID ASSIGNMENT IS AN ACCOUNT-WIDE PROCESS.

QUESTION 11

Why can complete trade-party details be silently ignored?

The Is New directive determines whether the row creates a party or references a stored party.

IS NEW = Y

Create a new trade party

Provide a GLN or Alternate ID plus every required identity, address, and contact field. The new record becomes reusable within its privacy scope.

NEW = N OR BLANK

Reference an existing party

Provide the stored GLN or Alternate ID. Any name, address, or contact values placed in the same row are ignored in favor of the Registry record.

IDENTITY LIMIT

CPSC does not currently validate supplied GLNs automatically. A structurally accepted GLN does not prove that the correct organization or facility was selected.

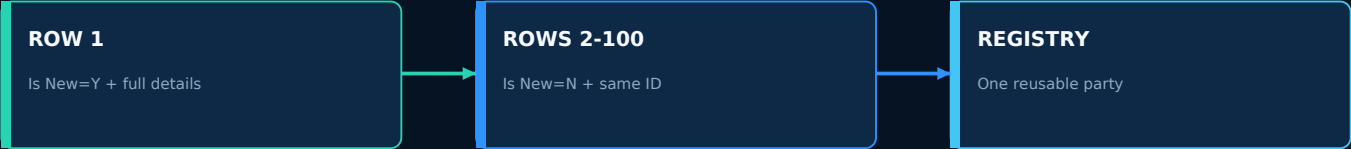
- Resolve existing-party identifiers from the destination Business Account or Product Collection, not from an old vendor file.
- If stored identity data are wrong, correct the trade-party record or create a new record; do not expect row details with Is New=N to overwrite it.

SILENT RISK: THE ROW MAY LOOK COMPLETE WHILE THE CERTIFICATE USES DIFFERENT STORED DATA.

QUESTION 12

How should one new trade party be reused across hundreds of rows?

Repeatedly marking the same manufacturer or laboratory as new can create duplicate-in-batch conflicts.



BACKEND SIGNAL

The API error dictionary includes separate errors when an Alternate ID or GLN is already being created in a previous bulk row. This supports a one-create, later-reference control pattern for repeat parties.

- For large or high-risk batches, pre-create reusable trade parties in the Registry and reference them in every CSV row.
- If the first create row fails, dependent reference rows may also fail. Reconcile the entire dependency group, not only the first error.
- Use the exact identifier and privacy scope from the destination collection when building the reference rows.

DEPENDENCY RULE: CREATE A REUSABLE PARTY ONCE, THEN REFERENCE IT CONSISTENTLY.

QUESTION 13

How do privacy scope and corrections change CSV references?

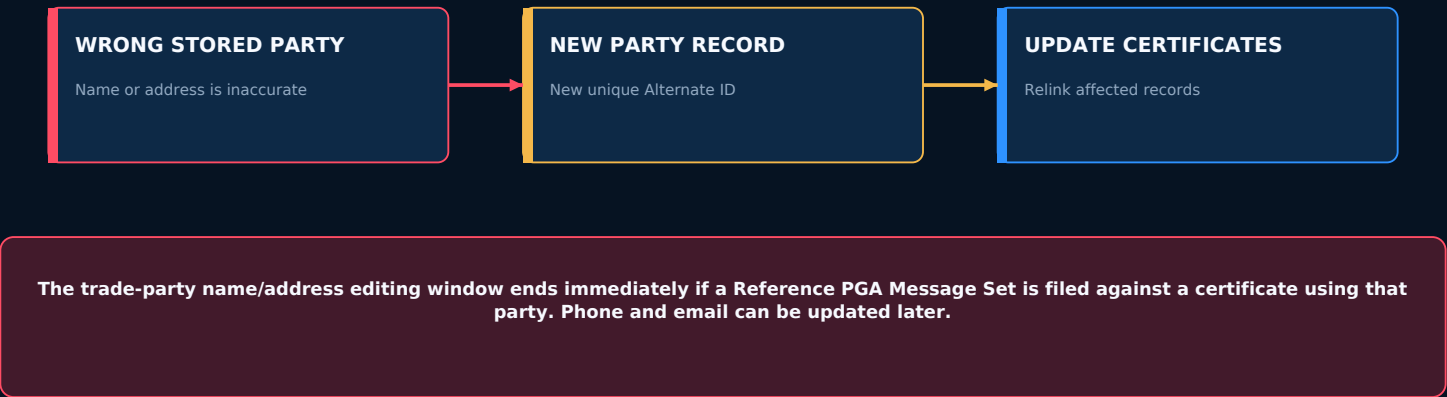
The same Alternate ID may resolve differently depending on collection privacy, and a wrong stored party may require a new identifier.

PRIVACY OFF

Shared trade-party list
Alternate ID and GLN uniqueness is checked against the Business Account's shared list. Non-private collections can reuse the same stored parties.

PRIVACY ON

Collection-isolated list
Uniqueness is checked inside the private collection. Users outside that collection cannot see or reuse those trade parties.



REFERENCE CONTROL: RESOLVE THE PARTY INSIDE THE DESTINATION COLLECTION BEFORE EXPORT.

QUESTION 14

How do ITL, LAB, and NOL change the required fields?

Lab type is a dependency trigger. The wrong type changes identity fields, citation logic, and test-date expectations.

ITL

CPSC-accepted lab

CPSC-ID required. Link the lab to the citations it tested.

LAB

Other laboratory

Use an existing GLN/Alternate ID or create the full trade-party record.

NOL

No laboratory

CSV-specific method for testing-exclusion codes in the Citation Codes field.

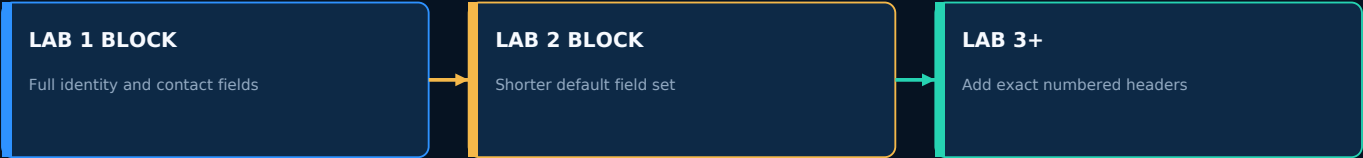
CHANNEL DIFFERENCE: the API model describes ITL and LAB records and stores exclusions separately. Do not copy API JSON logic into the CSV NOL structure.

LAB TYPE FIRST: DETERMINE THE EVIDENCE ROLE BEFORE POPULATING IDENTIFIERS OR CODES.

QUESTION 15

How can more than two laboratories be added safely?

CPSC permits additional numbered lab groups, but the actual v3 template does not repeat a full Lab 1 block for Lab 2.



TEMPLATE AMBIGUITY

The published workbook contains a full Lab 1 set but an abbreviated Lab 2 set without the same GLN, name, address, and contact columns. The guide nevertheless describes generic Lab {#} fields and unlimited laboratories.

- If an additional LAB already exists, reference its exact stored Alternate ID or other accepted identifier.
- For a new additional laboratory, the safest operational route is to create the trade party first, then reference it in the CSV.
- If columns are extended, use the exact Lab {#} naming pattern, add the complete required group, and validate a small test file before production.

DO NOT INVENT LAB HEADERS OR ASSUME THE ABBREVIATED BLOCK CAN CREATE A NEW LAB.

QUESTION 16

How should citations, exclusions, and component testing be mapped?

The certificate must preserve which laboratory or exclusion supports each applicable rule used to certify the finished product.

EVIDENCE	LAB TYPE	CODE FIELD	COMPONENT	TEST DATE
Finished-product test	ITL/LAB	Citation code(s)	NO	Most recent
Component test	ITL/LAB	Citation code(s)	YES + description	Most recent
Testing exclusion	NOL	Exclusion code(s)	NO	See rule below

LAST TEST DATE CONFLICT

The CSV guide lists Last Test Date as required. The Product Registry guide treats it as conditional for ITL/LAB. API guidance says exclusions-only certificates may temporarily use the upload date because the Registry currently requires a value.

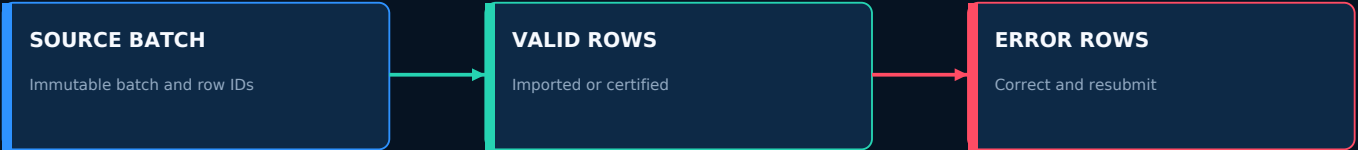
Do not assume that semicolon-separated citation, report ID, URL, and access-key lists create a documented positional pairing. Maintain an internal lab-citation-report crosswalk and avoid ambiguous grouping.

COMPONENT CONTROL: RECORD EVERY TEST RELIED UPON TO CERTIFY THE FINISHED PRODUCT.

QUESTION 17

How do you recover from a partial import without duplicates?

Valid rows can be imported while rejected rows remain outside the collection. Recovery must preserve exactly which population moved.



IMPORT DECISION

Cancel imports nothing. Import valid products moves only the accepted population. If an authorized user selects Certify valid certificates upon importing, eligible records may be certified immediately; otherwise they enter Awaiting Certification.

01 SAVE LOG

Errors and accepted count

02 FREEZE ACCEPTED

Do not include them again

03 CORRECT SOURCE

Fix only rejected rows

04 REUPLOAD DELTA

Verify final totals

RECONCILIATION GATE: ACCEPTED + REJECTED MUST EQUAL THE REVIEWED SOURCE POPULATION.

PRE-UPLOAD CONTROL

Final checklist, official sources, and working links

Recheck current official files before every production batch. Templates, code lists, and Registry behavior can change independently.

- 1

Current template, CSV guide, and code list recorded
- 2

All three sample rows deleted; 83 headers preserved
- 3

Identifiers and dates exported as literal text
- 4

Every contingent field trigger evaluated per row
- 5

Update/version state verified in destination collection
- 6

Trade-party identifiers resolved in correct privacy scope
- 7

Lab type, citations, exclusions, and components cross-mapped
- 8

Accepted and rejected populations can be reconciled

REGISTRY INTELLIGENCE WORKING LINKS

Full article - CPSC eFiling CSV Template

Free CPSC eFiling PDF guide library

CPSC eFiling Resource Center

Registry Intelligence - polandoc.com

Official source set

[1] Template v3

[2] CSV Guide v3

[3] Product Registry Guide v3

[4] API Specification v4

[5] Code list

[6] eFiling FAQ

[7] Product Registry FAQ

[8] Citation guidance

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