

CPSC eFiling for Foreign-Trade Zones

Advanced Inventory-to-Entry Control Guide

For FTZ operators, zone users, importers, customs brokers, compliance teams, and software providers that must match actual withdrawn inventory to the correct CPSC certificate data.

39-PAGE ADVANCED FIELD GUIDE - JULY 2026

Full article: polandoc.com/cpsc-efiling-foreign-trade-zones/

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

Registry Intelligence: polandoc.com/



START HERE

FTZ eFiling is controlled by four different clocks

A zone admission, a compliance action, a physical removal, and a customs entry are not the same event. Build the process around the correct clock.

ADMISSION

Merchandise enters the zone

CBP Form 214 or electronic E214 and the FTZ inventory record establish admission and zone status. This is not the CPSC eFiling event.

ZONE WORK

Storage, testing, or manipulation

Goods can remain in the zone, be tested, assembled, relabeled, or brought into compliance, subject to the applicable authorization and agency rules.

WITHDRAWAL

Inventory is selected for removal

The operator or user must identify the exact article, UIN or lot, quantity, product identity, and certificate version before release.

ENTRY

Covered goods enter U.S. commerce

Beginning January 8, 2027, certificate data must be filed in ACE when covered finished products are entered from the FTZ for consumption or warehousing.

The six-month FTZ extension changes the implementation date, not the requirement to possess a valid certificate for the actual finished product.

DO NOT TREAT FTZ ADMISSION AS PROOF THAT THE CPSC ENTRY FILING IS COMPLETE.

Sources: 16 CFR 1110.13; CPSC FTZ Guidance; 19 CFR 146.32

QUESTION 01

Which FTZ events trigger CPSC eFiling?

Use this matrix only for regulated imported finished products that require a CPC or GCC. Other customs or agency requirements may still apply.

EVENT	CPSC eFILING RESULT	CONTROL ACTION
Admission on E214	Not the Part 1110 filing trigger	Capture identity and future certificate-match fields now
Storage or authorized zone work	No entry filing yet	Keep goods blocked from U.S. release until supported
Withdrawal for consumption	Required from January 8, 2027	File Full or Reference PGA data with the entry
Entry for warehousing	Required from January 8, 2027	Check both CPSC data and 19 CFR 146.64 eligibility
Zone-to-zone / in-bond movement	No consumption or warehousing trigger yet	Carry traceability to the destination zone
Direct export or destruction	Outside the stated consumption/warehousing trigger	Close the FTZ inventory trail and retain evidence

If the movement changes into a consumption or warehouse entry, the filing result changes. Classify the actual customs transaction, not the planned commercial destination.

THE ENTRY TYPE AND THE PHYSICAL DESTINATION MUST AGREE.

Sources: 16 CFR 1110.5, .13; CPSC FTZ Guidance; 19 CFR 146 Subpart F

QUESTION 02

Does pre-deadline inventory escape the January 2027 rule?

No general grandfather rule is based on the FTZ admission date. The decisive event is the covered entry from the zone on or after the effective date.

ADMITTED 2025

Withdrawn before the deadline

Apply the certificate rules in effect for that transaction and preserve the actual certificate. The new FTZ eFiling mandate is not yet effective.

ADMITTED 2025

Withdrawn after January 8, 2027

Treat the inventory as in scope for the new electronic filing requirement if the finished product requires certification.

UNKNOWN FACTS

Old stock without factory or test data

Age in the zone does not cure a certificate gap. Quarantine, reconstruct evidence, retest where supportable, export, or choose another lawful disposition.

MIXED STOCK

Old and new versions share one article

Create a layer-level match now. Do not attach the newest certificate to the entire balance merely because the commercial SKU is unchanged.

The readiness population is every covered unit expected to be entered from an FTZ on or after January 8, 2027 - regardless of when it was admitted.

REMEDIATE LEGACY INVENTORY BEFORE IT BECOMES AN ENTRY-DAY BLOCKER.

Sources: 90 FR 1800, 1841; CPSC FTZ Guidance; 16 CFR 1110.13

QUESTION 03

Who is the finished-product certifier at FTZ withdrawal?

The party that admitted goods, operates the zone, owns the brand, or files data is not automatically the Part 1110 importer.

PARTY	DEFAULT POSITION	EVIDENCE TO VERIFY
Importer of Record	Normally the importer and certifier for foreign-made finished products	Entry arrangement and IOR eligibility
Authorized broker as IOR	May identify owner, purchaser, or consignee as responsible party	PGA party mapping and written authority
FTZ operator	Controls zone systems; not automatically the certifier	Operator agreement, bond, and user roles
FTZ user / owner	May be the importer or responsible owner/purchaser	Title, financial interest, and entry authorization
Foreign supplier	Provides facts and evidence; does not replace the U.S. import analysis	Factory, test, and product records
Software provider	May transmit or validate data; has no automatic legal role	Contract, permissions, and audit log

Freeze the legal entity name, address, Certifier ID, IOR relationship, and authority before certificate versions are loaded or entry data is generated.

THE FTZ OPERATOR'S SYSTEM ROLE DOES NOT CREATE CERTIFIER STATUS.

Sources: 16 CFR 1110.3, .7, .15; CPSC Importer Resources

QUESTION 04

What should each FTZ participant own?

A professional operating model separates legal ownership of the certificate from operational custody of inventory and technical transmission.

ROLE	MUST OWN	MUST RETURN
Finished-product certifier	Validity, accuracy, completeness, attestation, records	Approved certificate/version and release decision
Zone operator	Inventory integrity, admitted/removal trail, procedures	Release-ready UIN/lot/quantity event
Zone user	Product master, factory, evidence, commercial context	Certificate-match key for the selected stock
Customs broker	Entry construction and CPSC message transmission	ACE acceptance, warning, or error evidence
Laboratory / supplier	Source testing and manufacturing facts	Complete traceable reports and corrections
Technology provider	Validation rules, mapping, immutable logs	Reproducible payload and exception report

The data contract should identify owner, source, format, cutoff, approval, correction path, and retention rule for every field. Shared responsibility cannot mean unassigned responsibility.

ONE NAMED OWNER PER FACT; ONE NAMED OWNER PER RELEASE GATE.

Sources: 16 CFR 1110.11, .15-.17; 19 CFR 146.21-.24

QUESTION 05

Why do FTZ and CPSC require two audit trails?

CBP inventory traceability and CPSC certificate traceability overlap, but they answer different questions and cannot substitute for one another.

CBP / FTZ CHAIN

Proves where merchandise came from, how it was accounted for, and how it left the zone.

- E214 or Form 214 admission and supporting commercial documents.
- Zone lot or UIN, status, location, balances, adjustments, and removals.
- Entry, transfer, export, destruction, and annual reconciliation evidence.

CPSC CERTIFICATE CHAIN

Proves the finished product is correctly identified and supported by the required safety evidence.

- Product ID, description, certifier, citations, factory, and manufacture date.
- Testing date, laboratory, exclusions, component reliance, and records contact.
- Certificate version used for the exact finished product at entry.

Join the chains with a controlled match key. A clean FTZ balance does not prove the CPC/GCC is correct; a valid certificate does not prove it was filed for the right withdrawal.

AUDIT TRAIL CONSISTENCY IS THE CONTROL, NOT THE EXISTENCE OF TWO FILES.

Sources: 19 CFR 146.21-.25; 16 CFR 1110.11-.17

QUESTION 06

Why are the E214 and UIN not enough for eFiling?

Admission systems were designed to control merchandise and customs status. CPSC needs product-level compliance facts that ordinary FTZ records may never contain.

E214

Admission identity
Connects merchandise to admission, status, invoices, transport, and the zone inventory system. It is not a finished-product certificate.

UIN

Inventory identity
Supports traceability and fungible inventory accounting. It may group units that have different factories, tests, or certificate versions.

HTS LINE

Tariff identity
Supports customs classification. One HTS code can cover many products, and an HTS flag does not determine the exact CPSC citation set.

CERTIFICATE KEY

Compliance identity
Must resolve the actual Product ID, Certifier ID, Version ID or Full PGA facts for the finished product selected for entry.

Extend the FTZ data model; do not overload UIN, HTS, or article fields with concatenated certificate information that staff and brokers cannot validate reliably.

AN INVENTORY IDENTIFIER IS NOT A CERTIFICATE IDENTIFIER.

QUESTION 07

What is the minimum deterministic certificate-match key?

The match must identify the exact inventory layer and freeze the exact filing state before physical release from the zone.

01

FTZ LAYER
 Zone ID, admission, zone lot/UIN, receipt layer, status, and physical location.

02

COMMERCIAL PRODUCT
 Article, SKU, UPC/GTIN, model, description, and controlled variant.

03

PRODUCTION FACTS
 Actual manufacturer, site, manufacture month/year, lot, and material configuration.

04

CERTIFICATE
 CPC/GCC type, certifier, Product ID type/value, and current supported version.

05

EVIDENCE BASIS
 Citations, test/exclusion mapping, laboratories, report IDs, and component links.

06

ENTRY EVENT
 Entry number/line, quantity, date, broker, Full/Reference route, and ACE result.

Store the key as structured fields. A filename such as FINAL_CERT_NEW.pdf cannot prove which inventory layer or withdrawal used the document.

THE MATCH MUST BE REPRODUCIBLE WITHOUT STAFF MEMORY.

QUESTION 08

Why does FIFO fail when it is treated as certificate logic?

CPSC rejected the proposal to accept only the latest certificate associated with an article/supplier combination. The actual certificate for the shipment is required.

FIFO CAN ANSWER

A consistently applied CBP-authorized inventory method can identify which fungible inventory is deemed removed.

- Which receipt layer is debited first under the approved method.
- Quantity, zone status, and resulting balance for customs accounting.
- The admission-to-removal path required by the FTZ system.

FIFO CANNOT INVENT

The accounting sequence does not create or repair missing CPSC facts.

- A factory, test report, laboratory, or applicable citation.
- A valid certificate for units outside the certificate's supported scope.
- Permission to attach the newest version to older unsupported inventory.

Keep FIFO if it can deterministically select a receipt layer that already carries the correct certificate key. If not, enhance the system or adopt another authorized inventory method.

FIFO SELECTS INVENTORY; IT DOES NOT SELECT TRUTH.

Sources: 90 FR 1817; CPSC FTZ Guidance; 19 CFR 146.23

QUESTION 09

Where does a UIN hide certificate differences?

A UIN can be valid for CBP inventory purposes while remaining too broad for CPSC product and version matching.

FACTORY

Same article, different site

Manufacture place is required certificate content. Split or enrich the layer when Factory A and Factory B share a commercial code.

TESTING

Same product, new evidence

A later test date or laboratory can create a new certificate version without changing the UIN or SKU.

VARIANT

Same family, regulated difference

Material, coating, component, model, or age grading may alter testing and citations even when the warehouse treats units as interchangeable.

CERTIFIER

Ownership or entry-party change

A new importer/certifier cannot silently reuse another entity's Reference identifiers merely because the physical article is identical.

Add a CPSC sublayer key beneath the UIN whenever one UIN can represent more than one supported product or certificate version.

DO NOT FORCE CPSC FACTS INTO A UIN THAT WAS NEVER DESIGNED TO HOLD THEM.

Sources: 16 CFR 1110.3, .7, .11; 90 FR 1817

QUESTION 10

How should same-SKU inventory from multiple factories be controlled?

Visual sameness and a shared article number do not eliminate the certificate requirement to identify the actual manufacture place and supporting evidence.

RECEIPT

Separate factory layer

Capture manufacturer legal name, site address, country, production run, supplier lot, and admission reference at receipt.

EVIDENCE

Factory-specific support

Confirm the test sample and component chain support the production site and product configuration being entered.

CERTIFICATE

Correct manufacture data

Use the certificate version whose manufacturer, manufacture date, and test basis match the selected layer.

WITHDRAWAL

Freeze before release

The broker payload must reference the exact version selected before units cross into customs territory.

If one certificate legitimately covers production across sites, retain the written, evidence-based scope analysis. Never assume cross-factory coverage from a shared brand or purchase order.

FACTORY CHANGE IS A COMPLIANCE EVENT, NOT A WAREHOUSE NOTE.

Sources: 16 CFR 1110.11; 16 CFR 1109; CPSC eFiling FAQ

QUESTION 11

When does a certificate version stop being reusable?

Reference filing is efficient only while the facts on the certified Product Registry record remain identical to the product being withdrawn.

CHANGE EVENT	VERSION RESULT	INVENTORY ACTION
New testing or new laboratory	Update/new version with actual testing facts	Set effective layer/date; do not overwrite history
Factory or assembly site change	Reassess support and manufacture data	Block new layer pending approval
Material/component/process change	Run product/evidence delta review	Separate changed stock from prior stock
Citation or exclusion change	Rebuild rule-to-evidence mapping	Identify affected production and entry dates
Only a clerical correction	Use current Registry correction rules	Document why product facts did not change
Newest version exists	No automatic authority over older stock	Match each layer to the version that supports it

Maintain an immutable version ledger with creation, certification, effective inventory range, replacement reason, broker use, and retirement status.

LATEST DOES NOT MEAN APPLICABLE.

Sources: 16 CFR 1110.11-.15; Product Registry Guide and FAQ

QUESTION 12

Can fungible inventory remain mixed after certificate facts diverge?

It may remain fungible for customs accounting only if the approved method and records still allow the actual CPSC certificate to be identified for the units deemed removed.

SUPPORTABLE MIX

The inventory method selects a receipt layer and that layer carries a complete, verified certificate key.

- Same finished-product boundary and controlled product ID.
- Traceable factory, manufacture period, evidence, and version.
- Deterministic withdrawal rule tested in real transactions.

UNCONTROLLED MIX

The system reports only aggregate article/supplier inventory or always returns the newest certificate.

- Factory and manufacture period are not recoverable at removal.
- Old and new versions share one balance with no effective-layer rule.
- Manual overrides are not logged, reviewed, or reproducible.

When the certificate match is not deterministic, stop treating the stock as one CPSC layer even if CBP permits fungible accounting for other purposes.

FUNGIBILITY FOR DUTY ACCOUNTING IS NOT AUTOMATIC FUNGIBILITY FOR SAFETY EVIDENCE.

QUESTION 13

How does one-product-per-certificate affect an FTZ entry?

One entry, entry line, UIN, or weekly permit can involve many physical products. Each certificate must still describe only one product.

ENTRY

Transaction container
A customs entry can include multiple lines and many covered products. It does not create a single certificate boundary.

LINE

Customs reporting unit
A line may still contain more than one CPSC product or version if commercial grouping is too broad.

CERTIFICATE

One finished product
The product identifier and description must allow CPSC to match the exact finished product to its certificate.

MESSAGE SET

Product-specific data
Split or repeat message-set data as needed so every covered product relationship survives transmission.

Design the line crosswalk from the physical product and certificate boundary, not from the minimum number of lines desired by the commercial invoice team.

ONE ENTRY LINE IS NOT NECESSARILY ONE CPSC PRODUCT.

QUESTION 14

What must be proven before using a weekly entry workflow?

CPSC permits its message set within a weekly entry submission, but the underlying CBP weekly-entry authority and operating conditions still control.

01
AUTHORITY

Confirm the port director and broker process permits the intended weekly-entry method.

02
ELIGIBILITY

Verify the merchandise and zone operation fit the applicable 19 CFR 146.63 conditions.

03
ESTIMATE

Build the estimated units by type, zone value, dutiable value, and certificate key.

04
PRE-RELEASE

Obtain entry acceptance before merchandise covered by the entry is removed.

05
EXCESS

File an additional entry for units above the estimate before those units leave the zone.

06
RECONCILE

Compare actual removals, entry lines, certificate rows, and remaining layers.

Do not market 'weekly entry' internally as a universal shortcut. It is a controlled CBP procedure that must preserve the actual CPSC certificate relationship.

WEEKLY CONSOLIDATION DOES NOT AUTHORIZE WEEKLY GUESSING.

QUESTION 15

How should estimated and actual removals be reconciled?

Quantity differences can change both the customs authorization and the certificate-to-inventory map. Resolve them before the next physical release.

SCENARIO	CUSTOMS EFFECT	CPSC CONTROL
Actual equals estimate	Normal removal within accepted entry	Confirm every actual unit retained its planned certificate key
Actual below estimate	Excess estimate is not treated as entered	Return unused quantities to the correct inventory layers
Actual above estimate	Additional entry required before excess removal	Generate the additional product/version rows first
Product mix changes	Original unit estimate may no longer describe removal	Rebuild line and certificate allocation before release
Version changes midweek	Entry authorization and data may diverge	Split effective inventory/version at the change point
Manual emergency release	High risk of unauthorized or unsupported removal	Block unless documented entry and certificate gates pass

The reconciliation should balance quantities by entry line, UIN/lot, CPSC Product ID, Certifier ID, Version ID, and final disposition - not only by commercial SKU.

EXCESS UNITS NEED ENTRY COVERAGE BEFORE REMOVAL, NOT AFTER THE WEEK CLOSES.

Sources: 19 CFR 146.63(c); 16 CFR 1110.13; CPSC FTZ Guidance

QUESTION 16

How should a large weekly CPSC submission be split?

CPSC warns that CBP transaction file-size limits may require multiple weekly entries. Use a deterministic split protocol that preserves quantities and certificate relationships.

01

BUILD CANONICAL SET
Create one validated row set before deciding how many transactions are needed.

02

GROUP SAFELY
Keep entry line, product, certificate version, and required repeating records together.

03

MEASURE
Test actual encoded transaction size with the broker/software provider; do not use row count alone.

04

PARTITION
Split at controlled group boundaries and assign a unique package/entry sequence.

05

CONTROL TOTALS
Balance quantity, products, versions, citations, labs, and packages before transmit.

06

REASSEMBLE AUDIT
Store acknowledgments so the complete week can be reconstructed across entries.

No public guide guarantees one universal safe row count. Repeating citations, laboratories, and Full PGA data can make equally sized product lists produce very different message sizes.

SPLIT BY COMPLETE PRODUCT GROUP, NEVER BY ARBITRARY FILE POSITION.

QUESTION 17

Type 06, type 21, transfer, or export - what changes?

The route determines when goods enter customs territory and which data must accompany the transaction. It does not change the underlying product-safety facts.

ROUTE	PRIMARY USE	CPSC / FTZ CONTROL
Type 06	Consumption entry from FTZ	CPSC message set can accompany covered withdrawal
Weekly entry	Authorized estimated removals	Preserve actual product/version data across consolidation
Type 21	Warehouse entry	CPSC filing still applies; check 19 CFR 146.64 status limits
Zone-to-zone	Move under FTZ procedures	Carry certificate traceability; no consumption entry yet
In-bond export	Move for exportation	Close transfer/export evidence; do not miscode as U.S. consumption
Destruction	Remove inventory from commerce	Follow authorization, supervision, and inventory records

The CPSC FTZ guidance mentions type 21 as an option, not as an exemption. Analyze customs eligibility, operational cost, timing, and when the certificate data must be filed.

A DIFFERENT ENTRY TYPE DOES NOT ERASE CPSC CERTIFICATE REQUIREMENTS.

Sources: CPSC FTZ Guidance; 19 CFR 146.63-.68

QUESTION 18

What is the hidden type 21 warehouse-status trap?

19 CFR 146.64 does not allow every FTZ inventory status to be entered for warehouse. The CPSC guidance's type 21 option must be screened against the actual merchandise status.

POTENTIALLY ELIGIBLE

Nonprivileged foreign merchandise containing no privileged foreign components may be entered for warehouse, subject to the regulation and transaction facts.

- Confirm the entire finished product and every component status.
- Document the port, warehouse, entry, time limits, and release plan.
- File the required CPSC data for covered warehouse entry.

NOT A GENERIC ROUTE

Privileged foreign merchandise, or merchandise composed in part of privileged foreign merchandise, may not be entered for warehouse from a zone under section 146.64(a).

- Do not rely on a type 21 plan created before zone-status review.
- Do not confuse warehouse entry with ordinary commercial storage.
- Escalate mixed-status and zone-restricted cases to qualified trade counsel/broker.

Create a route-eligibility gate before using the bonded-warehouse alternative. The gate should return the specific status evidence, not a generic 'FTZ inventory' label.

TYPE 21 IS AN OPTION ONLY WHEN THE MERCHANDISE IS ELIGIBLE FOR IT.

QUESTION 19

Do zone statuses determine CPSC certificate scope?

No. Privileged, nonprivileged, domestic, and zone-restricted statuses are customs concepts. CPSC certification depends on the finished product and applicable safety rules.

PF

Privileged foreign status

Locks customs classification/valuation consequences under FTZ rules. It does not prove a CPC or GCC exists or identify its citations.

NPF

Nonprivileged foreign status

May affect duty treatment and warehouse-entry options. It does not make the product exempt from CPSC certification.

DOMESTIC

Domestic status merchandise

Customs treatment may differ, but a finished product distributed in U.S. commerce can still require certification under Part 1110.

ZONE-RESTRICTED

Restricted disposition

Customs disposition limits do not provide a CPSC testing or certificate exclusion. Analyze both systems separately.

Maintain customs status and CPSC applicability in separate fields. Never infer safety-certificate scope from zone status or infer zone-entry eligibility from a CPC/GCC.

CUSTOMS STATUS AND PRODUCT-SAFETY STATUS ARE DIFFERENT DECISIONS.

Sources: 19 CFR 146.41-.44; 16 CFR 1110.5-.13

QUESTION 20

Can noncompliant goods enter an FTZ for remediation?

The final rule does not prevent admission of goods into an FTZ to bring them into compliance. The control problem is preventing premature release into U.S. customs territory or commerce.

ALLOWED CONTROL PATH

Conditionally admissible goods may be stored or worked on under the applicable FTZ and agency requirements.

- Place units in a compliance hold status at admission.
- Define authorized testing, relabeling, repair, assembly, or other remediation.
- Generate new evidence and certificate facts only after work is complete.

PROHIBITED SHORTCUT

Zone location does not authorize distribution of an unsupported finished product in the United States.

- Do not release on a supplier promise or pending lab result.
- Do not use an earlier certificate if the product changed during remediation.
- Do not eFile a record that omits the final manufacture/assembly and test facts.

Use a three-state inventory flag: compliance hold, evidence complete but certificate pending, and entry-ready. Only the last state may feed the broker release file.

THE ZONE CAN HOLD THE RISK; IT CANNOT CONVERT MISSING EVIDENCE INTO COMPLIANCE.

Sources: 90 FR 1817; 19 CFR 146.31; 16 CFR 1110.11-.13

QUESTION 21

What changes when the finished product is assembled in the zone?

A component admission record or pre-assembly certificate cannot automatically become the finished-product record after zone manufacturing, assembly, or material change.

01
DEFINE OUTPUT

Identify the final consumer product, intended use, age grading, model, and packaging.

02
MAP INPUTS

Link every regulated component, supplier lot, and status layer used in production.

03
SET MANUFACTURE FACTS

Record the actual assembler/manufacturer, place, initial manufacture date, and run.

04
REASSESS RULES

Determine the complete finished-product citation and testing-exclusion set.

05
VALIDATE EVIDENCE

Confirm component reliance and finished-product tests support the final configuration.

06
ISSUE AND MATCH

Create the finished-product certificate and bind output inventory to its version.

For ambiguous domestic-versus-imported finished-product treatment created by FTZ production, obtain entry-specific written guidance from qualified customs/CPSC professionals before designing the filing route.

MANUFACTURING IN THE ZONE CREATES A NEW PRODUCT-IDENTITY DECISION.

QUESTION 22

Are component certificates eFiled when components leave the zone?

Voluntary component-part certificates must not be eFiled in ACE as finished-product certificates. Component evidence can support the later finished-product certification only under Part 1109.

COMPONENT

Not consumer-ready
A true component is intended for use in manufacturing or assembly and is not packaged, sold, or held for consumer use as a finished product.

VOLUNTARY CPCERT

Evidence layer
A component certificate may support due-care reliance, but it is not the finished-product certificate transmitted for consumer-ready goods.

FINISHED OUTPUT

Certification layer
The responsible finished-product certifier must issue the CPC/GCC for the final product and carry relied-upon testing facts.

DUAL-USE ITEM

Reclassification risk
If the same item is packaged or sold for consumer use, reassess whether it is actually a finished product requiring its own certificate.

The operational key is intended use and commercial presentation at entry, not the supplier's internal description of the item as a 'part.'

DO NOT TRANSMIT A COMPONENT CERTIFICATE AS THE FINISHED-PRODUCT RECORD.

QUESTION 23

Full or Reference PGA for high-volume FTZ operations?

Both filing routes can work. The right choice depends on product repetition, certificate stability, data ownership, broker capability, and the cost of version errors.

FULL PGA

The broker transmits the required certificate data elements with the entry.

- Works without using the Product Registry as the reusable record source.
- Requires complete, validated data for every covered transaction.
- Can produce larger repeating payloads in high-volume weekly entries.

REFERENCE PGA

The broker transmits Certifier ID, Product ID, and Version ID for a certified Registry record.

- Reduces repeated data when the exact certificate is reused correctly.
- Requires strong version governance and certified record status before entry.
- The Product Registry does not send anything to ACE automatically.

A hybrid model may be reasonable, but route choice must be deterministic by product and version. The broker should never decide Full versus Reference from incomplete entry-day spreadsheets.

REFERENCE IS SHORTER DATA, NOT SHORTER RESPONSIBILITY.

Sources: CPSC eFiling FAQ; CPSC Product Registry; CPSC CATAIR

QUESTION 24

How should Product Registry versions be frozen for withdrawal?

The certifier needs an auditable handoff from a certified Registry record to the exact FTZ inventory selected for an entry.

01

CERTIFY RECORD

Confirm the Product ID, version, parties, citations, dates, labs, and attestation.

02

SET EFFECTIVE SCOPE

Record which factories, manufacture periods, lots, and FTZ layers the version supports.

03

FREEZE SNAPSHOT

Export the identifiers and approved data used for the planned withdrawal.

04

LOCK RELEASE

Prevent inventory substitution after the broker package is approved.

05

TRANSMIT

Send the exact Certifier/Product/Version identifiers and obtain the ACE response.

06

RETIRE SAFELY

When facts change, stop new use without erasing prior entry/version history.

A version ledger should show every entry that used the version. This prevents a corrected or replacement record from obscuring what CPSC data actually accompanied an earlier shipment.

NEVER LOOK UP 'CURRENT VERSION' AFTER THE GOODS HAVE ALREADY LEFT THE ZONE.

QUESTION 25

How should Product Collections be structured for FTZ teams?

Collections should follow real ownership and confidentiality boundaries, not every warehouse aisle or customs entry.

LEGAL OWNER

Certifier-controlled account

Keep Business Account administration, certifier identity, certification authority, and recovery access under the responsible entity.

OPERATING SCOPE

Products and business units

Separate collections when permissions, workflows, or data owners differ materially - not merely to hide poor master-data design.

PRIVACY

Trade-party visibility

Choose Trade Party Privacy at collection creation; CPSC states the setting cannot later be toggled and affects copying behavior.

PARTNERS

Least-privilege access

Give operator, broker, laboratory, consultant, and supplier users only the roles needed; review and revoke access routinely.

Document the collection architecture before bulk upload. Privacy and copy limitations can make later reorganization expensive when many FTZ product versions already exist.

ACCOUNT DESIGN IS PART OF DATA GOVERNANCE, NOT AN IT AFTERTHOUGHT.

QUESTION 26

What must the broker receive before an FTZ release?

A broker cannot infer product safety facts from HTS, UIN, invoice description, or an old certificate folder. Provide one approved entry-line crosswalk.

01

ENTRY CONTEXT

Zone, entry type, entry number, line, HTS, origin, quantity, and planned release.

02

INVENTORY

Admission, lot/UIN, receipt layer, article, location, status, and actual units.

03

PRODUCT

CPSC Product ID type/value, description, model, UPC/GTIN, and variant.

04

CERTIFICATE

Certifier, CPC/GCC, Version ID or Full data, citations, tests, labs, and contact.

05

CONTROL

Approved route, timestamp, approver, checksum/version, and change cutoff.

06

RETURN

ACE acceptance/warning/error, correction reference, filer, and final transmitted payload.

Prohibit free-text substitutions in the final handoff. Any change to quantity, factory, product, certificate version, or line mapping should reopen the release gate.

THE BROKER PACKAGE MUST BE GENERATED FROM APPROVED SOURCE DATA.

QUESTION 27

Can an HTS flag, testing exclusion, or Disclaim solve a gap?

These mechanisms answer different questions. None authorizes unsupported certificate data or turns a certifiable product into a nonregulated item.

VALID USE

A documented product analysis determines whether certification applies and which citation or testing-exclusion codes belong in the filing.

- Use HTS guidance as a screening aid, not the final applicability decision.
- List every applicable rule even when a valid testing exclusion replaces test data.
- Use a Disclaim only when the entry facts support the selected reason.

INVALID SHORTCUT

A warning, unflagged HTS code, or missing test report is not resolved by selecting a convenient code.

- Do not disclaim because the certificate cannot be found.
- Do not omit a rule because one test was excluded.
- Do not let the broker choose product applicability from the tariff line alone.

Store a short applicability memorandum per product: jurisdiction, certificate requirement, certificate type, citations, exclusions, and who approved the decision.

A DISCLAIMER DESCRIBES A TRUE EXCEPTION; IT DOES NOT CREATE ONE.

QUESTION 28

What happens when ACE returns a warning or data problem?

CPSC has stated it initially does not intend missing PGA data alone to produce ACE rejects, but certificate obligations and enforcement remain. Warnings are not approval.

01

CAPTURE

Store the complete ACE response, entry, line, filer, timestamp, and submitted payload.

02

CLASSIFY

Separate format, identifier, reference, party, product, citation, and missing-data causes.

03

CONTAIN

Stop further withdrawals using the same defective mapping until scope is known.

04

CORRECT SOURCE

Fix the system of record, Registry version, crosswalk, or broker mapping - not only the output file.

05

REFILE / RESPOND

Use the current CBP/CPSC correction method and retain both original and corrected evidence.

06

PREVENT

Add a validation or release rule and test the affected high-volume scenario.

Do not measure success only by cargo release. A shipment can move while the organization still holds an inaccurate certificate, broken audit trail, or unresolved CPSC enforcement risk.

NO ACE REJECT DOES NOT MEAN NO COMPLIANCE FAILURE.

Sources: CPSC eFiling FAQ; 16 CFR 1110.13-.17; CBP ACE

QUESTION 29

What must travel with zone-to-zone, export, or destruction events?

A movement outside the immediate CPSC filing trigger still needs enough data to close the FTZ record and protect the later certificate match if goods remain eligible for U.S. entry.

ZONE-TO-ZONE

Carry identity forward

Preserve admission, UIN/lot, status, factory, manufacture period, product key, evidence status, and certificate version candidates.

IN-BOND

Match movement and carrier

Link the authorized transfer, in-bond number, manifested quantity, destination, carrier update, and receiving confirmation.

EXPORT

Prove foreign disposition

Retain export authorization, transfer, carrier, exit, quantity, and inventory debit. Do not leave units appearing available for U.S. consumption.

DESTRUCTION

Close controlled inventory

Retain authorization, method, supervision where required, quantity, waste/scrap result, and system adjustment.

If goods later re-enter an FTZ flow for U.S. consumption or warehousing, rebuild the entry decision from the current facts; do not revive a stale certificate key automatically.

EVERY DISPOSITION MUST CLOSE BOTH QUANTITY AND COMPLIANCE STATUS.

QUESTION 30

How should CBP and CPSC record retention be joined?

CPSC requires finished-product certificates and supporting records for at least five years from certificate creation. FTZ records follow separate customs requirements and audit structures.

CPSC PACKAGE

Retain the issued certificate and the evidence supporting every data element and attestation.

- Test results, component reliance, exclusions, citations, and due-care records.
- Certificate versions, creation dates, records custodian, and 24-hour availability process.
- Entry/version usage ledger and correction history.

FTZ / ENTRY PACKAGE

Retain the admission-to-removal chain and evidence needed for inventory and customs review.

- E214/Form 214, invoices, lot/UIN, status, location, balances, and adjustments.
- Entries, weekly estimates/actuals, transfers, exports, destruction, and acknowledgments.
- Annual reconciliation and procedures/system-control evidence.

Use one retention index with separate legal clocks. The longer applicable period should control destruction of the joined package, and legal holds must override routine deletion.

DO NOT DELETE THE ENTRY MAP WHEN THE CERTIFICATE RECORD IS STILL REQUIRED.

Sources: 16 CFR 1110.17; 19 CFR 146.21-.26; applicable CBP recordkeeping rules

QUESTION 31

Where should the FTZ operation place release gates?

The most effective controls stop unsupported inventory before it reaches the physical removal queue or the broker's final entry file.

01

AT ADMISSION
Classify future CPSC scope and capture identity; quarantine missing-source data.

02

AFTER ZONE WORK
Reassess the finished product, manufacture facts, testing, labels, and version.

03

BEFORE ALLOCATION
Confirm the selected UIN/lot layer has a deterministic certificate match.

04

BEFORE BROKER HANDOFF
Validate Full/Reference data, entry line, quantities, and current record status.

05

BEFORE PHYSICAL RELEASE
Freeze the approved package and block unapproved substitutions or excess units.

06

AFTER ACE RESPONSE
Archive the transmitted result, reconcile actuals, and contain any warning/error.

Each gate needs an owner, required evidence, machine validations, manual approvals, exception authority, and an immutable result. 'Pending' must never behave like 'pass.'

NO INVENTORY MOVEMENT WITHOUT A RECORDED PASS AT THE REQUIRED GATE.

QUESTION 32

What should be tested before January 8, 2027?

A desktop walkthrough is not enough. Test realistic volumes, mixed versions, late changes, and recovery paths in the systems and with the broker.

DATA

Legacy inventory population

Include missing factory, old tests, multiple certifiers, mixed UINs, components, finished goods, and products not requiring certification.

VOLUME

Largest weekly transaction

Use the maximum expected product/citation/laboratory repetition and verify deterministic split and control totals.

CHANGE

Midweek disruption

Simulate a factory change, new test, excess removal, substituted SKU, corrected Registry version, and broker cutoff breach.

RECOVERY

Failure and replay

Simulate ACE warning/error, unavailable Registry access, bad identifier, duplicate submission, and manual reconciliation.

Define success as accurate product/version matching, accepted transmission, complete evidence, balanced inventory, and reproducible recovery - not merely a file generated without an error.

TEST THE FAILURE PATH BEFORE PRODUCTION FINDS IT FOR YOU.

Sources: CPSC FTZ Guidance; CPSC Product Registry; CBP ACE certification environment

QUESTION 33

What is the fastest professional FTZ readiness plan?

Prioritize the deadline population and the certificate-match architecture. Cosmetic documentation can wait; unsupported inventory and untested entries cannot.

FIRST 30 DAYS

Establish scope, ownership, and the true legacy-inventory gap.

- Export every active UIN/lot likely to remain after January 8, 2027.
- Assign product applicability, certifier, factory, and certificate status.
- Choose the match key and block unsupported future admissions.

NEXT 60-120 DAYS

Remediate evidence, integrate systems, and prove the end-to-end transaction.

- Create/correct certificates and Registry versions; resolve type 21/status assumptions.
- Implement broker crosswalk, release gates, acknowledgments, and audit storage.
- Run large weekly, mixed-version, correction, and recovery tests.

Track readiness by units and expected withdrawal value, not only by number of SKUs. A small set of high-volume mixed-version articles can create the greatest operational exposure.

THE DEADLINE PROJECT IS FINISHED ONLY WHEN ENTRY-READY INVENTORY IS MEASURABLE.

QUESTION 34

Which validations should run before every broker file?

Use machine checks for structure and deterministic relationships, then reserve legal/product judgment for accountable reviewers.

01
SCOPE

Covered finished product, certificate type, citation set, and valid exclusion/disclaim basis.

02
IDENTITY

One product, accepted ID type/value, description, variant, factory, and manufacture period.

03
VERSION

Certified Registry status or complete Full data; effective layer and no superseding event.

04
RELATION

Entry line quantity balances to UIN/lot, product, certificate, and planned disposition.

05
FORMAT

Required fields, codes, date/address formats, repetitions, and transaction-size rules.

06
AUTHORITY

Named approver, broker cutoff, frozen payload, and no unresolved exception.

Software can catch missing, malformed, duplicate, contradictory, or unmatched data. It cannot decide that unsupported evidence is legally sufficient or attest on behalf of the certifier.

AUTOMATE DETECTION; KEEP ACCOUNTABILITY HUMAN AND DOCUMENTED.

PRE-LAUNCH CONTROL

Eight conditions for an entry-ready FTZ program

Do not wait for the January 2027 entry queue to reveal missing ownership, certificate versions, or message-size limits.

1

SCOPE COMPLETE

Every post-deadline inventory layer is classified by CPSC certificate requirement.

2

ROLES SIGNED

Operator, user, certifier, broker, lab, and system responsibilities are explicit.

3

MATCH KEY LIVE

Admission/UIN/lot/product/factory/version/entry relationships are structured.

4

LEGACY REMEDIATED

Unsupported or ambiguous stock is quarantined or placed on a lawful disposition path.

5

ROUTES VERIFIED

Type 06, weekly, type 21, transfer, and export assumptions were fact-checked.

6

REGISTRY READY

Certified versions, access, privacy, and version ledger are production controlled.

7

VOLUME TESTED

Largest weekly payload, splits, excess units, corrections, and replay passed.

8

AUDIT PROVEN

One sample can be traced from E214 through inventory, certificate, entry, and ACE response.

The strongest readiness evidence is a successfully reconstructed sample transaction selected after the fact - not a presentation that describes the intended workflow.

READY MEANS TRACEABLE, TRANSMITTABLE, AND RECOVERABLE.

Sources: 16 CFR 1110; 19 CFR 146; CPSC FTZ Guidance and eFiling resources

APP PREPARATION

What should an app-ready FTZ data package contain?

The future CSV Builder & Validator can check supported source data and produce a controlled Product Registry CSV. It cannot invent product facts or replace the certifier's judgment.

FTZ INVENTORY

Zone, admission, UIN/lot, receipt layer, status, quantity, location, and disposition.

PRODUCT MASTER

Primary Product ID, type, description, model, variants, HTS owner, and applicability.

PRODUCTION

Manufacturer, site, manufacture period, lot, materials/components, and change history.

CERTIFICATE

Certifier, CPC/GCC, citations, exclusions, labs, test dates, contact, and version ledger.

ENTRY CROSSWALK

Entry/line, actual quantity, Full/Reference route, identifiers, broker, and release status.

EVIDENCE INDEX

Report/exclusion/component links, source documents, approvals, corrections, and retention.

Native next step: validate the confirmed certificate fields, expose unmatched FTZ layers and version conflicts, and prepare structured Registry data without changing the underlying facts.

Open the CPSC eFiling CSV Builder & Validator

SOFTWARE CAN VALIDATE THE DATA PACKAGE; THE CERTIFIER MUST VALIDATE THE PRODUCT.

FINAL CONTROL

Final checklist and authoritative sources

Use this page before approving a covered FTZ withdrawal, releasing inventory, or closing the January 2027 readiness project.

- The movement is correctly classified as admission, zone work, consumption, warehousing, transfer, export, or destruction.
- The actual post-deadline inventory layer is identified by admission, UIN/lot, factory, manufacture period, and quantity.
- The finished-product certifier and every operational participant are documented from the real entry arrangement.
- The certificate describes one supported product and contains the correct rules, testing/exclusions, parties, dates, and attestation.
- The exact Full data or Certifier ID/Product ID/Version ID is frozen before physical release from the zone.
- Weekly estimates, actual removals, excess units, entry lines, and all split transactions balance to the inventory ledger.
- ACE responses and corrections are stored with the transmitted payload; a warning is not treated as approval.
- CBP and CPSC audit trails can be reconstructed together, and supporting records remain available for the required periods.

AUTHORITATIVE SOURCES

- 16 CFR Part 1110
- 16 CFR Part 1109
- 19 CFR Part 146
- 19 CFR 146.21
- 19 CFR 146.23
- 19 CFR 146.63
- 19 CFR 146.64
- CPSC FTZ Guidance
- CPSC Final Rule
- CPSC eFiling FAQ
- Importer Resources
- Broker Resources
- Product Registry
- CPSC Document Library
- CPSC CATAIR
- CBP ACE
- Full FTZ Article
- All Free PDF Guides

Independent educational resource. Verify current CPSC, CBP, FTZ Board, port, product-specific, and transaction-specific requirements. This guide is not legal advice, certification, brokerage, or an official filing service.

FINAL RULE: RELEASE ONLY WHEN INVENTORY, PRODUCT, CERTIFICATE, ENTRY, AND ACE DATA AGREE.