

CPSC eFiling for U.S. Importers

10 practical answers to prepare certificate data
before the next customs entry

MINI GUIDE • JULY 2026

[CPSC eFiling Resource Center](#) ↗

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QUESTION 01

What changed on July 8, 2026?

Certificate data became part of the customs-entry workflow.

Most imported regulated finished consumer products must now have their Certificate of Compliance data eFiled at entry.

eFiling changes how certificate data is transmitted. It does not create new testing rules or make previously unregulated products subject to certification.

JULY 8
2026

FTZ goods

JAN 8
2027

QUESTION 02

Does every imported product require eFiling?

No. Coverage depends on the finished product and the controlling rule.

eFiling generally applies when the item is:

- **Finished** A finished consumer product or regulated substance.
- **Regulated** Subject to a CPSC rule, ban, standard, or regulation.
- **Certified** The applicable requirement calls for a CPC or GCC.

No de minimis exemption: shipment value does not remove eFiling when certification is required.



QUESTION 03

Is an HTS code the final answer?

Treat the HTS flag as a screening signal—not a legal conclusion.

An HTS code can flag a product for CPSC review, but applicability still depends on product-specific facts.

- **Intended use** How and by whom the product is expected to be used.
- **Age grading** Whether the product is intended primarily for children 12 or younger.
- **Construction** Materials, components, design, and relevant safety features.
- **Controlling rule** The actual rule, ban, standard, regulation, or exclusion.

HTS ≠ COVERAGE DECISION

Document the product facts and the rule used to reach the decision.

QUESTION 04

Who is responsible—the importer or the broker?

The broker may transmit the filing. The importer owns the certification decision.

The importer is ultimately responsible for product certification and accurate certificate data.

A broker or another authorized trade partner may perform specific eFiling tasks, but the product scope, source records, permissions, and data handoff must be defined before entry.

Practical rule: your broker can file the data—but should never have to invent it.



QUESTION 05

Which seven data elements must be ready?

Build the record before the shipment reaches the filing stage.

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CORE CERTIFICATE DATA ELEMENTS

01	Product ID	Identification of the finished product
02	Citation codes	Each applicable CPSC requirement
03	Manufacture date	When the finished product was made
04	Manufacture place	Manufacturer name, address, and contact
05	Product test date	Most recent compliance test date
06	Testing laboratory	Testing party name, address, and contact
07	Records contact	Party maintaining the test records

QUESTION 06

Full PGA or Reference PGA?

Choose the route that matches your product volume and repeat-import pattern.

FULL

PGA MESSAGE SET

Send all seven certificate data elements in the ACE message set for each entry.

Best fit

Limited product count, one-off products, or certificates that are not repeatedly reused.

REFERENCE

PGA MESSAGE SET

Store the certified record in the Product Registry and send three identifiers through ACE.

Best fit

Repeat imports of the same products under reusable certificate records.

The Product Registry is optional—not a universal filing requirement.

QUESTION 07

Does the Product Registry send data to ACE?

No. It is a stand-alone repository.

After the certificate record is entered and certified, provide these three identifiers to the broker:

CERTIFIER ID

PRODUCT ID

VERSION ID

The broker uses those identifiers in the Reference PGA Message Set filed through CBP ACE. Registry storage alone does not complete the customs filing.



QUESTION 08

How should a bulk CSV be prepared?

Treat the official template as a controlled data structure.

- 01 Use the current CPSC Excel template.
- 02 Map source fields before filling rows.
- 03 Keep official column names unchanged.
- 04 Validate required and controlled values.
- 05 Export to CSV and inspect before upload.

Do not use a manually invented spreadsheet as a substitute for the current CPSC structure.



QUESTION 09

What causes most CSV upload failures?

Errors usually come from the file, the field values, or update logic.

- 01 Outdated template or wrong file format
- 02 Altered headers or unexpected columns
- 03 Missing required or contingent fields
- 04 Unsupported values, dates, or identifiers
- 05 Invalid citation or testing codes
- 06 Product-update and Version ID mismatch

Correct rejected rows from source evidence—never by guessing.

QUESTION 10

Are marketplace, private-label, Section 321, or FTZ shipments exempt?

There is no blanket exemption based on sales channel or shipment value.

Marketplace and private-label sellers

If the imported finished product requires certification, the seller must still resolve the responsible certifier, testing basis, and filing route.

Section 321 / de minimis

Low shipment value does not remove eFiling when the product requires certification.

Foreign Trade Zones

Covered FTZ merchandise entered for consumption or warehousing follows the separate January 8, 2027 effective date.



BEFORE THE NEXT SHIPMENT

Complete these six checks before entry

- ✓ Confirm whether each finished product requires certification.
- ✓ Identify the CPC or GCC and applicable citation codes.
- ✓ Collect all seven certificate data elements.
- ✓ Choose Full PGA or Reference PGA.
- ✓ Validate the CSV or the three Registry identifiers.
- ✓ Send the complete filing data to the broker before entry.

CPSC eFiling Resource Center for U.S. Importers

polandoc.com/cpsc-efiling-resources/ ↗

[Registry Intelligence](#) • polandoc.com ↗

[Official CPSC importer resources](#) ↗

Educational resource only. Verify current requirements with CPSC, CBP, the controlling rule, and qualified advisers.