

CPSC eFiling Requirements for U.S. Importers

14 difficult questions that must be resolved before
certificate data reaches CBP ACE.

ADVANCED FIELD GUIDE - JULY 2026

CPSC eFiling Requirements for U.S. Importers

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START HERE

The four decisions that control every filing

Mandatory for most covered imports since July 8, 2026. Begin with the legal and product facts.

01**SCOPE**

Does the imported finished product require a CPC or GCC under a CPSC-enforced requirement?

02**RESPONSIBILITY**

Who is the finished-product certifier, and who is only transmitting data?

03**CERTIFICATE**

Which exact product and certificate version match the merchandise being entered?

04**TRANSMISSION**

Will this product use Full PGA, Reference PGA, or an appropriate optional Disclaim?

A correct ACE transmission cannot cure a wrong scope or certificate decision.

QUESTION 01

Who is legally responsible when a broker files?

Transmission authority and certification responsibility are not the same role.

IOR

CPSC starts with the Importer of Record eligible to make entry. That party may be an owner, purchaser, or authorized customs broker.

ROLE SPLIT

Broker transmits

Certifier supports

IF THE IOR IS AN AUTHORIZED BROKER

01 Broker identifies the owner / purchaser / consignee

The PGA data can identify the party that authorized entry as the finished-product certifier.

02 That identified party owns the certificate decision

It must be able to support product scope, testing, citations, manufacturing facts, and records.

03 Broker controls transmission accuracy

The broker needs either the exact three Reference identifiers or the complete Full PGA data package.

04 Failure to identify the responsible party matters

The final-rule preamble states CPSC can hold a broker responsible when the required certifier identification is not submitted.

Never tell the broker to 'use last time's certificate' without an exact product-and-version match.

QUESTION 02

Where does one product end and another begin?

One certificate should describe one product; material differences drive separation.

CREATE A SEPARATE CERTIFICATE WHEN A DIFFERENCE COULD AFFECT COMPLIANCE

DESIGN

Geometry, construction, intended use, age grading, or safety-critical features change.

PROCESS

Manufacturing method or manufacturing location changes in a compliance-relevant way.

COMPONENT SOURCE

A material, paint, substrate, battery, fabric, or other component source changes.

EVIDENCE

The applicable citations, testing, exclusions, laboratory mapping, or latest test date changes.

NARROW APPAREL GROUPING

Same-material apparel in multiple styles, sizes, and colors may be one product when manufactured and tested together. Do not generalize that narrow example.

Commercial SKU logic is not the legal test for certificate boundaries.

QUESTION 03

Can one entry contain Full, Reference, and Disclaim?

Yes. Filing method can vary by product under the same entry.

CBP ENTRY

Each unique product needs its own PGA line sequence

PRODUCT A

REFERENCE PGA

Certifier ID + Product ID + Version ID

PRODUCT B

FULL PGA

Complete certificate data submitted at entry

PRODUCT C

OPTIONAL DISCLAIM

Supported reason + intended-use data

TECHNICAL BOUNDARY

A CPSC PGA Message Set cannot be transmitted by itself. It must be part of a valid ACE transmission. A Reference PGA Message Set requires an entry and cannot simply be attached to a manifest.

Do not force one filing route across the entire company or shipment.

QUESTION 04

Which route is safer: Full PGA or Reference PGA?

The safer route is the one your data controls can support reliably.

FULL PGA

All certificate data travels with the ACE entry.

USUALLY FITS

- Limited regulated product volume.
- Products or certificates are not repeatedly reused.
- Broker systems can accept the complete data set.

PRIMARY RISK

Repeated manual mapping at entry creates more opportunities for omission, truncation, and wrong lab-to-citation relationships.

REFERENCE PGA

A certified Product Registry record is referenced at entry.

USUALLY FITS

- Repeated imports of an unchanged product certificate.
- Stable Product IDs and disciplined version control.
- A controlled broker handoff for all three identifiers.

PRIMARY RISK

The Registry does not send data to ACE. One stale or mistyped identifier can point to the wrong certificate or fail to link.

Choose per product and import pattern - then document the route in the broker SOP.

QUESTION 05

Why do the three Reference identifiers fail in practice?

They must identify one exact certified record - not merely the right company or SKU family.

01 CERTIFIER ID

BUSINESS ACCOUNT

Created for the importer account and remains constant for that account.

02 PRODUCT ID

PRIMARY IDENTIFIER

The Primary Product ID is the key used in the Reference PGA Message Set.

03 VERSION ID

CERTIFICATE STATE

Selects the exact certified version that matches the imported merchandise.

CONTROL THE HANDOFF AS A SINGLE IMMUTABLE KEY

CERTIFIER ID + PRODUCT ID + VERSION ID

ONE CERTIFICATE KEY - COPY AND VALIDATE AS A UNIT

- Prefer a Product ID visible on packaging, packing list, or invoice.
- Additional identifiers help matching but do not replace the Primary Product ID in Reference PGA.
- Include product name, invoice / PO, certificate status, and approved Version ID in the broker handoff record.

QUESTION 06

When is a new Version ID mandatory?

Editing convenience is not permission to overwrite a certificate already used at entry.

Has the certificate been certified?

NO

Edit the incomplete record. It is not complete until fully entered and certified.

YES

Check both the current editing grace period and whether the version has already been used in Reference PGA.

CURRENT PRODUCT REGISTRY GUIDE - OPERATIONAL RULE

- Within the stated 48-hour grace period, edits can use the same Version ID only if that version has not been used in a Reference PGA Message Set.
- Any edit requires re-certification. The guide warns that the exact grace-period duration is subject to change.
- After the grace period, or after Reference PGA use, create and certify a new Version ID.

A product change may require retesting and a new certificate - not merely a new database version.

QUESTION 07

How must component testing be represented?

The finished-product certificate must preserve the testing chain it relies on.



REQUIRED MAPPING LOGIC

01	Every relied-upon lab	Identify each testing laboratory used to support the finished-product certification.
02	Lab-to-rule relationship	Associate each lab with the specific citation(s) it tested, including component testing.
03	Latest relevant test date	The Full PGA structure reports the latest lab testing date when multiple laboratories are listed.
04	Testing exclusion	List the applicable rule and the specific exclusion code instead of inventing laboratory data.
05	Optional access fields	Test report ID, URL, key, and component description are optional, but records may still be requested.

QUESTION 08

Which manufacturing facts are easiest to misstate?

A supplier's office, invoice date, and shipment date are not substitutes for manufacturing facts.

DATE

Use the date the finished product was manufactured, produced, or assembled. For a run over several days, the final rule uses the initial date of manufacture.

PLACE

Identify the actual facility where the finished product was made or assembled, with the required address and contact details.

BATCH

Lot number and production start/end dates can strengthen traceability, but optional fields do not replace the required manufacture date and place.

CHANGE

A new manufacturing location or process can be a material difference requiring a separate certificate and possibly new testing.

Resolve contradictions against source records before the broker receives the filing package.

QUESTION 09

Do kits, bundles, and components use one certificate?

Packaging several items together does not automatically convert them into one certifiable product.

DECISION SEQUENCE FOR EVERY ITEM INSIDE THE BUNDLE

- 1 Is it itself a finished consumer product?
- 2 Is it subject to a CPSC-enforced requirement that requires certification?
- 3 Is it materially identical to the product described by the proposed certificate?
- 4 Can the item be matched to the certificate by product ID and description?

COMPONENT CERTIFICATES

Component-part certificates are voluntary and are not eFiled in ACE when a component is imported. A finished-product certifier may rely on them under 16 CFR part 1109, but the resulting finished-product certificate remains the operative certificate.

COMMON FAILURE

A supplier provides one generic certificate for a gift set even though separate regulated finished products, different labs, or different product identifiers exist inside the package.

Analyze the certifiable product - not the carton count, marketplace listing, or bundle SKU.

QUESTION 10

What changes for Section 321 and international mail?

Low value and mail routing change the mechanism - not the underlying certificate requirement.

NO

VALUE-BASED EFILING EXEMPTION

BEFORE ARRIVAL

REGISTRY DATA FOR INTERNATIONAL MAIL

SECTION 321 / DE MINIMIS

- A certifiable product still needs eFiled certificate data regardless of shipment value.
- The final-rule preamble states regulated de minimis shipments use Entry Type 86 for the CPSC Message Set.
- Disclaim is optional and only appropriate when the product facts support it.

INTERNATIONAL MAIL

- ACE cannot receive the PGA Message Set for international mail in the ordinary way described by the rule.
- The finished-product certifier must enter the required certificate data into the Product Registry before arrival.
- A noncommercial gift from one consumer to another is treated differently; marketplace sales remain commercial.

DIRECT-TO-CONSUMER WARNING

Do not build a workflow that assumes the U.S. buyer will supply the certificate. Identify the eligible importing / certifying party and the carrier or broker filing route before the order ships.

QUESTION 11

How should FTZ withdrawals be controlled?

The separate applicability date does not remove the certificate-to-inventory matching problem.



OPERATIONAL CONTROLS BEFORE WITHDRAWAL

- | | | |
|-----------|--------------------------|--|
| 01 | Inventory layer | Connect each withdrawal to the product, supplier, manufacture facts, testing evidence, and correct certificate version. |
| 02 | ACE timing | Submit certificate data with the applicable ACE entry. CPSC states the message set can be transmitted with type 06 and with weekly entry submission. |
| 03 | Version freeze | Do not automatically attach the newest certificate to older merchandise when the older inventory was made under different facts. |
| 04 | Route choice | Decide Full or Reference per product and ensure the FTZ filer can transmit the necessary CPSC data. |
| 05 | Exception control | Use a Disclaim only when the product and intended-use facts support it; FTZ status itself is not a disclaimer basis. |

The key question is which certificate matches the goods withdrawn - not which certificate is newest.

QUESTION 12

When is a Disclaim appropriate - and when is it dangerous?

A Disclaim explains why certificate data are not provided; it does not erase a certificate requirement.

DISCLAIM A

- Product is outside CPSC jurisdiction.
- No CPSC-enforced rule requiring a certificate applies.
- Component part is for manufacture / assembly and not sold or used as a finished consumer product.

DISCLAIM B

- CPSC is exercising identified enforcement discretion.
- Examples in current CATAIR guidance include certain exempt adult apparel and qualifying marked refrigerators.
- Other listed scenarios include specified gifts and personal-use items returned after repair.

THREE LIMITS IMPORTERS MISS

- Disclaim PGA Message Sets are optional, but when filed they require intended-use data.
- An HTS flag is a screening signal, not proof that Disclaim A or B is correct.
- If a testing exclusion applies to a certifiable product, report the exclusion code on the certificate - do not use Disclaim merely because testing was excluded.

Document the factual and regulatory basis for every Disclaim before transmission.

QUESTION 13

What about used, overstock, resale, and gifts?

Commercial status, manufacture date, and the original certificate requirement control the answer.

**USED - BEFORE RULE DATE**

Generally no certificate if manufactured before the applicable CPSC requirement took effect.

**USED - AFTER RULE DATE**

Commercial import remains subject when the product originally required certification.

**OVERSTOCK / RESALE**

Regulated finished products distributed in commerce remain subject to testing, certification, and eFiling.

**CONSUMER GIFT**

A genuinely noncommercial consumer-to-consumer gift is not subject; the sender must have possessed the item.

**MARKETPLACE C2C SALE**

A sale through a marketplace is commercial and is not covered by the consumer-gift treatment.

Keep evidence of manufacture date and transaction type when relying on an exception.

QUESTION 14

Does an ACE warning mean the shipment is compliant?

No. Entry messaging and CPSC certificate enforcement are different questions.

WARNING

CPSC states that it does not initially intend to request entry denial solely for missing eFiled data and expects warnings rather than reject messages for missing PGA data.



That does not make missing or inaccurate certificate data acceptable.

REQUIRED RESPONSE DISCIPLINE

- 01 Preserve the ACE response, entry number, line, transmitted identifiers, and time.
- 02 Determine whether the problem is missing data, wrong product scope, stale version, or transmission error.
- 03 Freeze further reuse of the affected certificate key until the facts are reconciled.
- 04 Coordinate the permitted correction path with the broker / filer; do not invent a workaround.
- 05 Escalate uncertain agency-system issues to eFilingSupport@cpsc.gov with a precise record trail.

24 HOURS Certificate availability upon CPSC / CBP request

5 YEARS Certificate and supporting records

BEFORE RELEASE

The pre-entry certificate release gate

No broker handoff until every answer below is documented.



Product is within CPSC jurisdiction and the certificate requirement is documented.



Manufacture date and actual manufacturing place match source records.



Finished-product certifier is identified; broker and data-entry roles are separate.



Latest relevant test date and supporting report trail are verified.



Certificate describes one materially consistent product and matches the shipment.



Full / Reference / Disclaim route is approved for this specific product.



Primary Product ID is visible in commercial records and matches the filing package.



Reference route uses the exact Certifier ID + Product ID + Version ID key.



Applicable citations and any testing exclusions are complete and current.



Certificate is complete / certified, not incomplete or awaiting certification.



Every relied-upon lab is mapped to the rule(s) it tested.



Owner of post-entry warnings, records, version changes, and broker communication is named.

RELEASE ONLY THE APPROVED PRODUCT-CERTIFICATE-ENTRY MATCH

Keep the signed checklist with the broker handoff and supporting record index.

KEEP THIS GUIDE CURRENT

Official sources and importer working links

Technical templates, code lists, and system behavior can change. Recheck the current documents before filing.

[1] Final Rule - Certificates of Compliance

90 FR 1800 (Jan. 8, 2025), corrected Sept. 24, 2025

[2] CPSC eFiling Frequently Asked Questions

Current agency answers on scope, enforcement, special shipments, and dates

[3] CPSC CATAIR Implementation Guide v2.3

PGA record structure, filing methods, data hierarchy, and technical fields

[4] Product Registry User Guide v3.0

Business Accounts, permissions, manual entry, bulk upload, edits, and versions

[5] Product Registry FAQ v1.4

Certificate identifiers, roles, Product Registry, and Reference PGA questions

[6] CPSC eFiling Document Library

Current templates, code lists, training, FAQs, and implementation materials

Registry Intelligence CPSC eFiling Resource Center

polandoc.com/cpsc-efiling-resources/