

AMAZON PRIVATE-LABEL

Can You Use Your Supplier's CPC or GCC?

When supplier documents are usable evidence - and when the importer must issue its own finished-product certificate.

THE SHORT ANSWER

An importer cannot simply pass through a foreign supplier's certificate. Supplier evidence may still support the importer's own CPC or GCC if the reliance rules are satisfied.

FOCUSED LINKEDIN FIELD NOTE - JULY 2026

START WITH THE ROLE

The same supplier document has different legal value in three selling patterns

Before reviewing the certificate, identify who is responsible for the finished product. Seller Central ownership, brand ownership, and the FBA destination do not answer that question.

IMPORTER**Seller imports the overseas product**

The responsible importer must issue the CPC or GCC for the imported finished product. A foreign supplier's certificate cannot simply be passed through.

RESELLER**Seller buys U.S.-landed inventory**

The seller does not become the certifier for the earlier import merely by listing the product. Obtain the furnished certificate from the responsible manufacturer or importer and verify exact coverage.

DOMESTIC**Private-label product is made in the U.S.**

The private labeler must certify unless the domestic manufacturer does. Import eFiling does not apply, but the updated certificate-content rules still do.

For imported products, the eFiling responsibility follows the importer/certifier identified for the entry - not the marketplace account that happens to sell the goods.

FIRST IDENTIFY THE RESPONSIBLE FINISHED-PRODUCT CERTIFIER.

DO NOT CONFUSE THE OUTPUTS

A supplier file, a legal certificate, Amazon acceptance, and eFiling are not interchangeable

A document can be genuine and still be the wrong artifact for the next system. Treat each output as a separate proof with a separate owner.

EVIDENCE

Supplier test report

Shows what was tested, by whom, when, to which rules, and with what result. It is an input to certification - not the CPC or GCC itself.

CERTIFICATE

Importer-issued CPC or GCC

The responsible certifier's affirmation for the exact finished product. The importer remains responsible even when another party drafts the document.

ARKETPLAC

Amazon case status

Amazon may accept, reject, or request different documents under its own policies. Marketplace acceptance does not establish CPSC sufficiency.

CUSTOMS

CPSC eFiled record

Certificate data are transmitted for the import entry through a Full or Reference PGA Message Set. The Product Registry does not send the entry filing by itself.

A foreign factory's CPC or GCC can be part of the reliance package. It does not become the importer's certificate merely because the product, brand, or test report appears similar.

A PASSING LAB REPORT IS EVIDENCE; IT IS NOT A STANDALONE CPC OR GCC.

Sources: CPSC Online Sellers Safety Guide; CPC/GCC FAQs; CPSC Product Registry guidance.

THE RELIANCE GATE

What must an importer prove before relying on supplier testing or certification?

Under 16 CFR part 1109, due care requires affirmative verification. An email attachment and a supplier assurance are not a complete reliance record.

1

ROLE

Who performed testing, who certified, and who will issue the finished-product certificate?

2

PRODUCT

Do model, dimensions, materials, components, colors, photos, and intended age match?

3

FACTORY

Is the tested sample traceable to the actual manufacturing site and production process?

4

SCOPE

Do the reports cover every applicable rule relied upon for this exact finished product?

5

LAB

For a CPC, was the laboratory CPSC accepted for each specific rule on the test date?

6

RECORDS

Are complete reports, attestations, test plans, sampling facts, and amendments accessible?

7

DATES

Do manufacture dates, test dates, lot coverage, and periodic-testing records support this production?

8

CHANGES

Has any design, process, component source, coating, factory, or required label changed?

Due care is risk-sensitive and does not permit willful ignorance. Preserve what was checked, by whom, when, against which source, and with what conclusion.

RELIANCE IS A DOCUMENTED CONTROL PROCESS - NOT A FILE-HANDOFF SHORTCUT.

PRIVATE-LABEL MATCH TEST

Does adding your brand make the supplier's evidence invalid?

Not automatically. Branding alone may not change product performance, but the importer must still prove that the private-label item is the same finished product covered by the evidence and that all required labeling remains correct.

MAY REMAIN USABLE

Evidence may remain usable when the only change is branding or packaging artwork and the following are unchanged and documented:

- Finished-product design and dimensions
- Materials, coatings, and component sources
- Factory, process, and tested sample identity
- Intended age, warnings, tracking, and required labels
- Applicable rules and production coverage

RE-EVALUATE OR RETEST

A new decision is required when a change could affect compliance or break the tested-product match, including:

- New factory or manufacturing process
- Different material, paint, coating, or component supplier
- Changed construction, dimensions, power, or mechanical behavior
- New age grading, required warning, or compliance-relevant label
- Production outside the report or periodic-testing coverage

A material change does not always require retesting every rule. Reassess the affected requirements, obtain the needed testing, and issue an accurate new certificate before relying on the changed product.

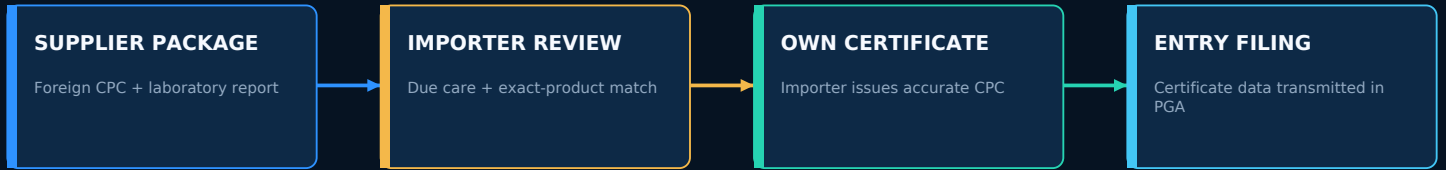
PROVE THE PRIVATE-LABEL PRODUCT MATCH FROM THE PHYSICAL PRODUCT OUTWARD.

Sources: CPSC CPC FAQ; CPSC Material Change and Component Part Testing guidance; 16 CFR 1107/1109.

WORKED CASE

The supplier sends a CPC and lab report for a toy that will carry your brand

Assume the Amazon seller imports the finished toy into the United States and is the responsible importer. The supplier's package contains useful evidence, but it does not complete the seller's certification or eFiling workflow.



WHAT CANNOT BE REUSED AS-IS

The seller cannot name the foreign factory's CPC as the seller's own certificate, treat the test report as a CPC, or eFile an importer certificate without proving that the report covers the private-label finished product and current production.

VERIFY Confirm the CPSC-accepted lab scope, rules, full report, sample, factory, model, materials, manufacture/test dates, and any changes.	DOCUMENT Retain the underlying reports, attestations, plans, supplier answers, product crosswalk, reviewer, date, and due-care conclusion.
ISSUE If reliance is valid, the importer issues its own CPC for the exact product. If not, obtain the affected testing before certification.	SEPARATE Send the correct certificate data into CPSC eFiling. Handle Amazon's document request as a separate marketplace outcome.

General-use product? Apply the GCC testing basis instead of the CPC laboratory rule, but keep the same role, identity, evidence, and due-care controls.

SUPPLIER EVIDENCE MAY SUPPORT THE CERTIFICATE; IT DOES NOT REPLACE THE IMPORTER'S DECISION.

FINAL DECISION

Use the supplier package only after these gates are closed

This field note answers one question: whether supplier documents can support an Amazon private-label product certificate. The complete guide covers the wider Amazon-to-customs control system.

- 1

ROLE

Responsible importer or certifier confirmed
- 2

ARTIFACT

Report, supplier certificate, and marketplace status distinguished
- 3

MATCH

Exact private-label product and current production identified
- 4

DUE CARE

Underlying records verified and reliance documented
- 5

CHANGE

Material-change and periodic-testing implications resolved
- 6

OWN OUTPUT

Correct CPC/GCC issued and eFiling responsibility completed

NEED THE COMPLETE AMAZON PRIVATE-LABEL WORKFLOW?

Open the full 32-page guide covering product identity, variants, factories, testing evidence, Seller Central requests, eFiling, and broker handoff.

OPEN THE FULL GUIDE ON POLANDOC.COM

polandoc.com/cpsc-efiling-amazon-sellers/

OFFICIAL SOURCES

[CPC FAQ](#) [GCC FAQ](#) [Online Sellers](#) [Part 1109](#) [Part 1110](#) [eFiling FAQ](#) [Importer resources](#)