

Which Products Require CPSC eFiling?

A practical scope decision guide for U.S. importers

COMPLEX CASES • JULY 2026

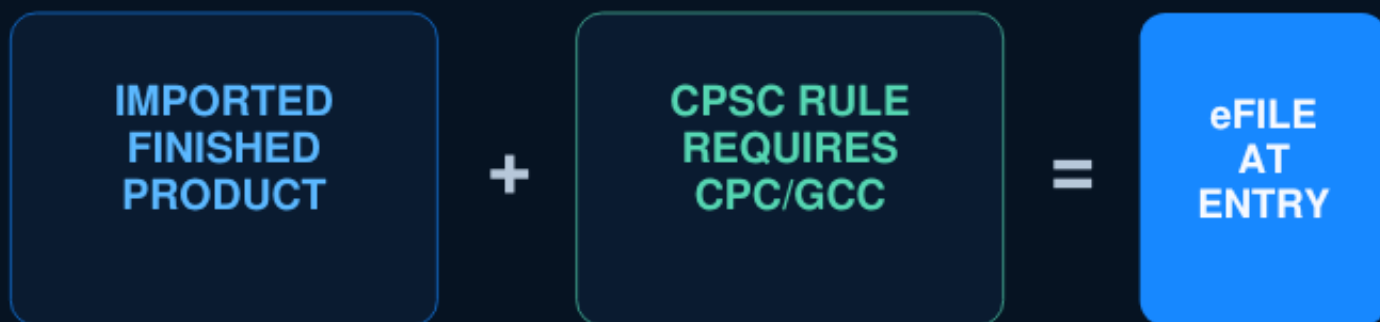
[Read the full product-scope guide ↗](#)

[CPSC eFiling Resource Center ↗](#)

THE CONTROLLING RULE

Certification comes first. eFiling comes second.

eFiling changes transmission - not which products require a certificate.



A product is not automatically eFiled merely because CPSC has jurisdiction, the HTS line is flagged, or a marketplace asks for compliance documents.

The real question: Is this specific finished product required to have a CPC or GCC?

If the answer is uncertain, stop before filing. The broker should transmit supported certificate data - not decide product coverage from a short description.

SCOPE DECISION

Use five gates - in this order

A supported YES at every gate establishes the core eFiling path.

01

Finished product

The item is packaged, sold, held for sale, or used by consumers.

02

Foreign manufactured

The finished product was made outside the United States.

03

Import purpose

It is entered for consumption or warehousing.

04

Applicable CPSC rule

A rule, ban, standard, or regulation applies to the actual product.

05

Certificate required

That requirement calls for a CPC or GCC.

ALL FIVE YES = PREPARE THE CERTIFICATE DATA FOR eFILING

A NO answer should be documented with the product fact, rule scope, exclusion, or import fact that supports it.

HTS SCREENING

A flagged HTS code can lead to three different outcomes

Treat the CPSC HTS list as a screening and targeting aid - not a coverage decision.

A

Certificate required

File the CPC or GCC data through a Full or Reference PGA Message Set.

B

Certificate + testing exclusion

eFile the certificate and include the supported testing exclusion code.

C

No certificate required

Do not invent certificate data. A voluntary Disclaim may be appropriate if the facts support it.

A flagged line does not prove coverage. An unflagged line does not prove that eFiling is unnecessary.

Resolve the actual finished product, intended user, materials, design, use, and controlling rule before choosing a filing path.

CERTIFICATE TYPE

Children's and general-use products follow different certification paths

Both paths lead to eFiling when the covered finished product is imported.

CPC

CHILDREN'S PRODUCTS

Examples

Toys, cribs, strollers, nursery products, children's apparel, sleep products, and products with child-specific hazards.

Testing basis

Generally based on passing tests from a CPSC-accepted third-party laboratory, subject to applicable relief and exclusions.

GCC

GENERAL-USE PRODUCTS

Examples

Mattresses, rugs, adult apparel, bicycles and helmets, lighters, ATVs, lawn mowers, household and construction products.

Testing basis

Based on testing or a reasonable testing program; a CPSC-accepted third-party laboratory is generally not required.



PRODUCT BOUNDARY

A part can become a finished product when consumers buy or use it

Supplier terminology is not controlling. Follow the actual packaging, sale, and intended use.

FINISHED PRODUCT

Packaged, sold, held for sale, or intended for direct consumer use. It may require its own CPC/GCC and eFiling.

TRUE COMPONENT

Used only in manufacturing and not sold or used as a finished consumer product. The component import is not eFiled as a finished-product certificate.



Component testing may support the finished-product certificate - and every relied-upon test must remain traceable.

CERTIFICATE BOUNDARIES

One product can require several rules - and similar variants may still need separate records

Do not stop after finding the first applicable citation.

Example: a children's electronic toy may require review for:

Product-specific standard

Small parts

Lead / coatings

Phthalates

Battery hazards

Labeling / warnings

Other design features

- **Every rule** List every applicable citation supported by the certificate and testing evidence.
- **Every product** CPSC states that each product needs a separate eFiling submission, even if one CPC covers similar products.
- **Every variant** Separate records when manufacture, testing, intended age, materials, design, or certificate facts differ.

Do not collapse different SKUs into one Registry record merely because the supplier calls them one product family.

COMMERCIAL STATUS

Used, resale, and overstock goods do not share one answer

Manufacture date and the applicable rule date can change the result.

USED - BEFORE RULE DATE

If the product did not previously require certification, eFiling does not create a new certificate requirement.

MAY BE OUTSIDE**USED - AFTER RULE DATE**

If certification was required and the import is commercial, the certificate and eFiling obligations can still apply.

REVIEW / eFILE**RESALE OR OVERSTOCK**

Covered regulated finished products distributed in commerce remain subject to certification and eFiling.

NOT EXEMPT**MANUFACTURE DATE UNKNOWN**

Do not assume the product predates the rule. Obtain reliable date and product evidence before import.

STOP / VERIFY

Pain point: historical goods often fail because the importer cannot prove the production date, original rule status, or certificate basis.

SALES CHANNEL

Marketplace and low-value shipments are not separate compliance worlds

Amazon, Shopify, direct-to-consumer, mail, and wholesale use the same certificate test.

NO SECTION 321 / DE MINIMIS EXEMPTION FOR A PRODUCT THAT REQUIRES CERTIFICATION

- **Private label**
Do not simply pass along a foreign supplier's certificate. The responsible importer must own a supported CPC/GCC decision.
- **Broker / IOR**
The broker may transmit the entry, but the owner, purchaser, consignee, or other responsible party must supply defensible product facts.
- **Foreign seller**
For direct-to-consumer or de minimis imports, a foreign firm may meet the importer definition as owner or purchaser.



COMMERCIAL OR NOT?

A genuine gift can be different from a marketplace sale

The transaction facts matter more than the label placed on the package.

QUALIFYING NONCOMMERCIAL

A consumer outside the United States sends a true gift or personal effect to another consumer, outside a commercial transaction, after having physical possession of the item.

eFiling generally not required

COMMERCIAL TRANSACTION

A sale through a marketplace or other platform - including one consumer selling to another - remains commercial and must follow the normal product-scope test.

Certificate decision still required

CPSC does not typically treat the consumer buying or receiving a product for personal use as the importer responsible for certification. That does not erase responsibility elsewhere in the transaction.

Document the sale, sender, possession, recipient, and intended use before claiming noncommercial treatment.

THREE-WAY DECISION

A testing exclusion is not the same as a Disclaim

Choose the path from the certificate requirement - not from a desire to avoid data collection.

CERTIFICATE REQUIRED

No applicable testing exclusion

**eFile CPC/GCC + every citation****CERTIFICATE REQUIRED**

Testing exclusion applies

**eFile CPC/GCC + exclusion code****NO CERTIFICATE REQUIRED**

No certifiable CPSC requirement

**No certificate; voluntary Disclaim if supported****DISCLAIM A**

No certificate because no certifiable rule applies or the product is outside CPSC jurisdiction.

DISCLAIM B

A rule applies, but CPSC is exercising enforcement discretion that no certificate is required.

Disclaim PGA Message Sets are not mandatory. If used, an intended-use code is required.

CERTIFICATE FRESHNESS

A product change can turn a valid certificate into stale evidence

Recheck the product before the changed version reaches the next customs entry.

Reopen the scope and testing review when any of these change:

- **Design** Dimensions, construction, mechanical or electrical features
- **Manufacturing process** Factory steps, controls, or production method
- **Component source** Supplier, part, material, coating, or battery
- **Intended user** Age grading, marketing, instructions, or foreseeable use
- **Testing basis** Laboratory, report, date, exclusion, or certification scope

OLD CERTIFICATE + CHANGED PRODUCT = UNRESOLVED COMPLIANCE RISK

Update the testing, certificate, Product Registry record, and broker handoff before reuse.

SPECIAL ROUTES

Domestic, mail, and FTZ products change the workflow - not the product test

Start with certificate applicability, then apply the correct entry route and date.

DOMESTIC FINISHED PRODUCT

May still require a CPC/GCC and updated certificate content, but there is no CBP ACE import eFiling.

NO ACE eFILING**INTERNATIONAL MAIL / DIRECT**

Mail and direct shipment do not create a blanket exemption. Resolve the responsible importer and certificate obligation.

NORMAL SCOPE TEST**FOREIGN TRADE ZONE**

For covered merchandise withdrawn for consumption or warehousing, the eFiling effective date is January 8, 2027.

JAN 8, 2027

Timing does not replace coverage analysis: the same finished product facts and certificate rules remain controlling.

IMPORT-READINESS FILE

Do not green-light a shipment until these four evidence blocks are complete

The filing should transmit a decision already supported by product and test records.

1 PRODUCT FACTS

Finished-product identity, intended user and age, materials, design, use, marketing, and HTS classification.

2 LEGAL RESULT

Exact rule scope, CPC or GCC, every citation, testing exclusion, or documented reason no certificate is required.

3 SUPPORTING EVIDENCE

Manufacture date/place, laboratory and test dates, component testing, reports, lot data, and records contact.

4 FILING HANDOFF

Product ID, Full or Reference PGA route, Registry identifiers if used, responsible importer, and broker instructions.

If one block is unsupported, do not let the broker, spreadsheet, or filing system guess it.



KEEP THIS DECISION RULE

Certificate applicability controls eFiling applicability

NO CPC / GCC REQUIRED

No certificate data to eFile.
Document the reason and use a
Disclaim only when supported.

CPC / GCC REQUIRED

eFile the supported certificate
data regardless of sales channel
or shipment value.

Continue with the complete product-scope analysis

[Full article: Which Products Require CPSC eFiling?](#) ↗

[CPSC eFiling Resource Center for U.S. Importers](#) ↗

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

Official verification sources

[CPSC eFiling FAQ](#) ↗

[CPSC certificate guidance](#) ↗

[CPSC Document Library](#) ↗

Educational resource only. Verify current product-specific requirements, testing evidence, customs treatment, and the controlling rule before filing.