

SECTION 05 / WORKED CASES

Four hard scenarios sellers actually face

The same annual request can produce different results. Compare the report age, product history, production status, and legal trigger.

01 / CURRENT FILE

Eight-month report; same toy

FACTS

- The report is current, complete, and matches the exact toy.
- AMAZON
- Ask the TIC to verify the existing documents.
- CPC
- No automatic new CPC if the certificate remains accurate.

02 / OLD REPORT

Fifteen-month report; same toy

FACTS

- No physical change, but the North American report is over 12 months.
- AMAZON
- Retesting is required under current Direct Validation guidance.
- CPC
- Determine whether the test is periodic, material-change, or Amazon-only.

03 / MATERIAL CHANGE

New paint or component supplier

FACTS

- The source change could affect lead, phthalate, coating, or other compliance.
- TESTING
- Test every affected rule; a full repeat is not always required.
- CPC
- Issue a new CPC for the materially changed product.

04 / STATIC INVENTORY

Production stopped; old FBA stock remains

AMAZON

- A notified ASIN can still face the 12-month report rule.
- FEDERAL
- Storage alone generally does not trigger periodic testing of continuing production.
- CPC
- The existing CPC may cover unchanged units; assess any later test separately.

ONE ACTION THAT IS NEVER A FIX

Do not create a newly dated CPC merely to make an old report appear current. The report date, tested product, and supporting evidence must remain traceable.