



**PMK Instruction Series  
Consumer Product  
Safety Commission  
(CPSC)**

**eFiling Program  
Overview**

**Prepared June 2026**

## CPSC eFiling Program

The new mandatory U.S. Consumer Product Safety Commission (CPSC) electronic filing (eFiling) program requires importers, manufacturers, and private labelers to submit product certificate data to U.S. Customs and Border Protection (CBP) at the time of import entry.

The program applies to any consumer product subject to a CPSC mandatory safety standard. The mandatory eFiling date for most regulated consumer products is July 8, 2026, with a later deadline applying to products entering through a Foreign Trade Zone.

While the program covers any consumer product subject to mandatory safety standards and certification (including de minimis shipments), children's products require a specific certificate type (the CPC) and carry stricter third-party testing requirements.

For more information, visit: <http://www.cpsc.gov/eFiling>

# Two Types of Filing

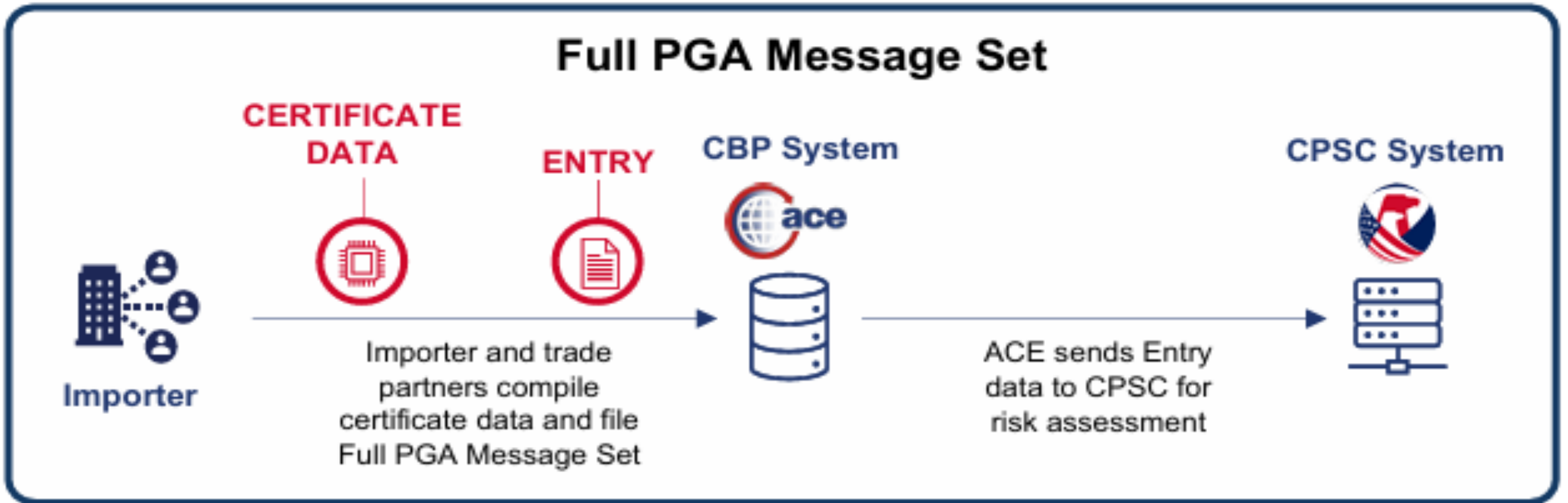
## 1. Full Partner Government Agency (PGA) Message Set: Seven Elements

The importer provides their broker with the full product certificate for the imported product, and the broker files it in the CPSC PGA Message Set. This is recommended **if the importer imports a limited number of regulated consumer products or does not repeatedly import the same product.**

## 2. Reference PGA Message Set: Three Identifiers

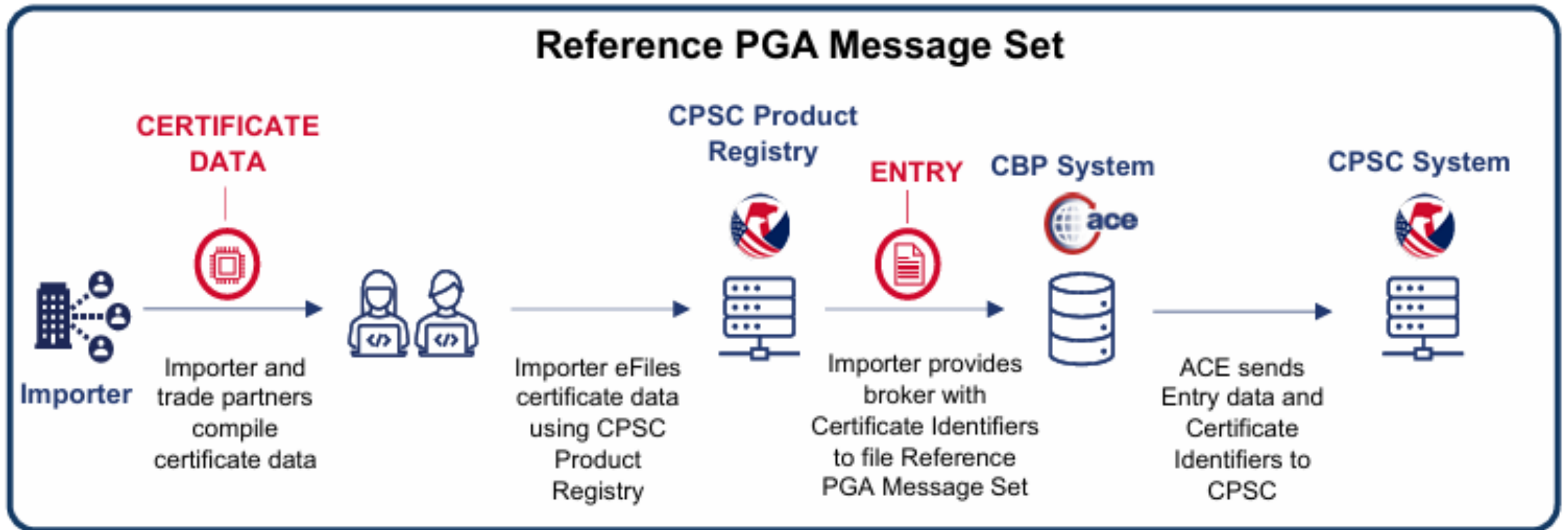
The importer pre-enters the certificate data into the CPSC Product Registry and then provides their broker with certificate identifiers to be filed in the PGA Message Set. The certificate identifiers are the Certifier ID, Product ID, and Version ID. **This option is preferable if the importer repeatedly imports regulated consumer products covered by the same product certificates.** By using the Product Registry, the importer can leverage manual or bulk upload features to file product certificate data in a streamlined and accelerated manner.

# 1. Full PGA Message Set



*Figure 1. Full PGA Message Set Process*

## 2. Reference PGA Message Set



*Figure 2. Reference PGA Message Set Process*

# Harmonized Tariff Schedule (HTS) Flagging

- Certain HTS codes will be flagged in ACE as a signal that the product likely needs a certificate to be eFiled
- Approximately 600 HTS codes based on CPSC expert review
- HTS codes on the list if at least 50% of those products would normally require certification, or CPSC is actively targeting for specific risk

[CPSC-Guidance-and-HTS-List-for-Filing-of-Electronic-Certificates-040826-V5.pdf](#)

**\*\*The list is NOT all encompassing\*\***

**Products under other HTS codes may still require certification** e.g. children's clothing, where the age and sizing ranges are not clearly identified within the HTS classification, may still require a CPC.

# Regulatory Robot—Free CPSC Online resource



- Designed to guide importer through CPSC requirement to identify important product safety requirements
- After answering a few questions about a product, it creates a customized report with the likely applicable requirements

[Safer Products Start Here! | CPSC.gov](https://www.cpsc.gov)

# Children's Product Certificate (CPC)

- A written certification issued by the manufacturer or importer confirming that the children's product complies with all applicable safety rules, bans, standards, or regulations enforced by the CPSC
- Must be based on passing test results from a third-party testing laboratory; the lab provides testing services and results but does not issue the CPC itself
- Must be issued by the importer for products manufactured overseas (see 16 Code of Federal Regulations (CFR) Part 1110)
- Is drafted by the importer in a word processing document
- Does not require a signature; the act of issuing the certificate satisfies the legal requirement
- Does not need to be filed with the CPSC proactively; it must be provided to the agency upon request

[CPC-Example-Clothing](#)

[Children's Product Certificate | CPSC.gov](#)

# Children's Product Certificate - Seven Elements

- 1. Identification of the product** covered by this certificate: Describe the product(s).
- 2. Citation to each CPSC children's product safety rule** to which this product is being certified: The certificate must identify separately each children's product safety rule that is applicable to the children's product.
- 3. Identification of the U.S. importer certifying compliance of the product:** Provide the name, full mailing address, and telephone number of the importer certifying the product.
- 4. Contact information for the individual maintaining records of test results:** Provide the name, full mailing address, e-mail address, and telephone number of the person maintaining test records in support of the certification.
- 5. Date and place where this product was manufactured:** For the date(s) when the product was manufactured, provide at least the month and year. For the place of manufacture, provide at least the city (or administrative region), state (if applicable), and country where the product was manufactured or finally assembled. If the same manufacturer operates more than one location in the same city, provide the street address of the factory.
- 6. Provide the date(s) and place when the product was tested** for compliance with the consumer product safety rule(s) cited above: Provide the location(s) of the testing and the date(s) of the test(s) or test report(s) on which certification is being based.
- 7. Identify any third party, CPSC-accepted laboratory** on whose testing the certificate depends: Provide the name, full mailing address, and telephone number of the laboratory. Registered [small batch manufacturers](#) who are not required to third party test their product to certain children's product safety requirements must include the registration number provided by the CPSC in this section of the CPC. (Products manufactured by registered [small batch manufacturers](#) must still comply with applicable children's product safety rules.)

# General Certificate of Conformity (GCC)

Importers of certain general-use products (i.e., non-children’s products) — that are subject to a consumer product safety rules, or a similar rule, ban, standard or regulation under any other CPSC-enforced statute — are required to certify in a written GCC based on testing or a reasonable testing program, that their product(s) comply with applicable product safety rules.

[Rules Requiring a General Certificate of Conformity \(GCC\) - General Use/Non-Children’s Products | CPSC.gov](#)

[General Certificate of Conformity \(GCC\) FAQ | CPSC.gov](#)

# Testing Exclusions, and Disclaims

## Testing Exclusions

Some products are legally exempt from certain safety tests. If your product qualifies for one of these exemptions, you need to include the specific exemption code when you file.

These codes only apply when a certificate is otherwise required. If no certificate is needed at all, you'd use a "Disclaim" instead (see below).

The exemption code is simply the CFR regulation number that grants the exemption — including the subsection letters and numbers exactly as written.

Example: Children's wearing apparel has a flammability test exemption listed at 16 CFR 1610.1(d)(1) and 1610.1(d)(2), so those regulation numbers become your exemption codes.

# Testing Exclusions, and Disclaims

## Disclaims

If no certificate is required for your product, you file a Disclaim instead. You'll also need to include a code describing what the product is used for.

There are two types:

### **Disclaim A — This product doesn't require a certificate**

Use this when your product falls under CPSC's import codes but either:

- no safety rule requiring a certificate actually applies to it, or
- it's outside CPSC's jurisdiction entirely

Examples include hats, scarves, gloves, adult collectible toys, sport helmets (other than bike helmets), and industrial equipment not sold to consumers.

# Testing Exclusions, and Disclaims

## **Disclaims**

### **Disclaim B — CPSC has said they won't enforce the certificate requirement for this product**

Use this when a rule technically applies to your product, but CPSC has chosen not to require a certificate for it.

Examples include adult clothing claiming a flammability exemption, and household refrigerators that already display a recognized safety certification mark.

# Testing Exclusions, and Disclaims

Does a CPSC rule, ban, standard, or regulation apply?	Is CPSC exercising enforcement discretion?	What should be submitted?	What Intended Use Codes should be provided?
Yes	No	Certificate with testing exclusion codes	130.001-005 (optional)
	Yes	Disclaim B	130.006 (required)
No	N/A	Disclaim A	081.XXX 090.XXX 100.XXX 130.XXX (besides 130.001-005) 155.XXX 940.XXX 970.XXX 980.000 (required)