

U.S. CPSC eFiling Has Taken Effect – Answers to Top FAQs!

eFiling, jointly launched by the U.S. Consumer Product Safety Commission (CPSC) and U.S. Customs and Border Protection (CBP), requires importers to electronically submit specific certificate compliance data, either a CPC or a GCC certificate, as applicable, to CBP at the time of product entry.



CPSC eFiling has been officially in effect since 8 July 2026. On the same day, CBP issued an official announcement (CSMS # 69177694), through which CPSC clarified that it does not require the customs system to block

entry applications for products missing eFiling data. However, this flexible implementation does not relieve importers of their obligations; instead, it transfers enforcement risk to a post-entry review stage. U.S. importers are still legally responsible for certifying the relevant imported products.

In practice, many companies are still confused about issues such as the responsible party, scope of covered products, and specific filing details. To address this, Hong Kong Standards and Testing Centre (STC), as a CPSC-recognised laboratory, has compiled this eFiling Q&A based on frequently asked questions from recent client enquiries, providing practical guidance. STC also offers comprehensive one-stop services including product standard evaluation, testing, and eFiling uploads, helping you navigate eFiling with confidence.

Q: Who is the official registrant and certifying party for eFiling? How to register?

According to CPSC, the entity registering in the CPSC Product Registry system must be a U.S.-based importer. Entities located outside the U.S., such as Chinese manufacturers, third-party testing laboratories, or customs brokers, cannot register as the primary party. However, they may be invited by the importer as trade parties to set up accounts and assist in adding product information, but the legal entity ultimately responsible for eFiling certification remains the U.S. importer.

CPSC registration link: <https://www.cpsc.gov/eFiling-CPSC-Product-Registry>

Q: Is CPSC eFiling mandatory? Does it apply to all products?

CPSC mandates eFiling for products that meet all of the following criteria:

- Products imported into the U.S. in finished form (eFiling for FTZs takes effect on 8 January 2027);
- Products subject to CPSC jurisdiction requiring a CPC / GCC certificate;
- Products intended for consumption, warehousing, or distribution in commercial channels.

Q: What if a product's HTS code is captured by customs, but the product is exempt?

If the product's HTS code is captured by customs but the product qualifies for an exemption, exception, or determination under the underlying rules, the related Exclusion Code must be entered in eFiling, but no related testing information is required.

Q: Are there validity period requirements for test reports / certificates under eFiling?

Currently, eFiling rules do not specify a validity period for test reports / certificates. However, CPSC requires a minimum testing frequency of at least once per year for products within the CPC scope. Therefore, for compliance, the test date of the report supporting the CPC certificate should be no more than 12 months before the eFiling submission. For GCC-scope products, there is currently no validity period requirement.

Q: Does each batch of the same product require a separate eFiling?

If all of the seven data elements of a CPC / GCC certificate are identical for a product, the same certificate can be referenced for multiple shipments of that product. The seven data elements are:

- Product ID
- Citation Code
- Manufacture Date
- Manufacturer Information
- Product Test Date
- Testing Laboratory Information
- Point of Contact Information

Q: If a container holds different products or models, does each product in that container require a separate eFiling?

Yes. If any of the seven certificate data elements is different, each product must be filed separately in eFiling.

Q: How do I upload eFiling data?

Currently, there are three methods for eFiling submission:

- Online entry for individual product information;
- Bulk import of product information via CSV file;
- Transmission of product information via API.

Q: Can I enter all test items from my test report into eFiling?

No. eFiling is essentially an electronic version of the CPC / GCC certificate under CPSC jurisdiction. Products and items outside the scope of CPC / GCC do not have corresponding Citation Codes in the CPSC Product Registry system, so they cannot be entered into eFiling.

Q: If my test report needs to be revised / updated, do I need to make a new eFiling upload for the corresponding product?

Yes. The eFiling information for a product is tied to its test report. If the test report content is modified or updated, the importer must update the product's eFiling promptly. Note that if changes are made within 48 hours of the eFiling certification, the original Version ID can still be used; otherwise, the original eFiling record must be archived and a new Version ID should be used.

Q: Can I still obtain a CPC / GCC certificate document after completing eFiling?

Yes. After completing eFiling, a PDF-format CPC / GCC certificate can be exported from the CPSC Product Registry system.

Q: How should I provide eFiling information to my customs broker during import clearance?

After completing eFiling, the importer must provide the customs broker with three certificate identifiers for the product: Certifier ID, Product ID, and Version ID. The broker must enter these three identifiers into the CBP's ACE system for clearance of the corresponding product.

- Certifier ID: Uniquely identifies the importer in the system.
- Product ID: Uniquely identifies a product within a product collection. It can be UPC, SKU, etc.
- Version ID: The latest version identifier of the product certificate, which is unique.

These three identifiers are used to locate the exact product certificate in the system.

Hong Kong Standards and Testing Centre (STC) is a not-for-profit, independent testing, inspection and certification organization. With a global network of ISO/IEC 17025 accredited testing laboratories and over 60 years of experience in consumer product testing, our service can meet your conformity assessment needs with high efficiency and reliability. With extensive practical experience and a deep understanding of CPSC eFiling operational requirements, STC can help you complete every test and eFiling smoothly and efficiently, effectively reducing compliance risks and freeing you from burdensome eFiling procedures. If you prefer to leave testing and compliance matters to professionals so you can focus on R&D and operations, STC is a trusted partner you can rely on.

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