Bureau Veritas

Frequently Asked Questions

16 CFR 1110 FINAL RULE FAQs

WHAT IS THE MANDATORY EFFECTIVE DATE FOR EFILING?

eFiling is mandatory 18 months after the Final Rule is published unless products are entering US commerce for consumption or warehousing from an Foreign Trade Zone (FTZ) which will have a 24 month effective date. This makes the mandatory effective date for eFiling July 8, 2026 unless product is being entered from an FTZ, which will be effective January 8, 2027.

IF I HAVE 18 MONTHS TO COMPLY, WHEN DO I NEED TO BEGIN THE PROCESS TO SETUP EFILING?

You need to begin NOW! Most testing programs are on a 12 month testing cycle for repeat items. This means you want to send data to the CPSC Product Registry the next time it is due for testing so it will be present for importing by July 8, 2026 for the 18 month effective date.

For example, product is tested in March 2025 and data is not submitted to the CPSC Product Registry. Using a 12 month testing cycle, this repeat item will be due for testing again in March 2026. Data should be ready to be submitted to the CPSC Product Registry by then so it is available July 8, 2026 when the mandatory rule is effective.

Another example, a product is tested in August 2025 and data is not set up to be submitted to the CPSC Product Registry. If this is a repeat item then testing will not be due for again until August 2026, yet data would need to be submitted to CPSC Product Registry by July 8, 2026 in order to import. Since the data was not setup to be sent to CPSC the last time it was tested (August 2025) it will not be available for any imports by July 8, 2026.

WHAT IS CONSIDERED A FINISHED PRODUCT?

The Final Rule specifies the definition of what is considered a finished product:

Finished product – Removes the phrase “replacement parts” and clarifies the three requirements that define a “finished product”: (1) the product is imported for consumption or warehousing, or distributed in commerce; (2) the product is subject to a consumer product safety rule under the CPSA, or similar rule, ban, standard, or regulation under any other law enforced by the Commission; *and* (3) the product is packaged, sold, or held for sale to, or use by, consumers.

DISCLAIMS ARE NOT REQUIRED. SHOULD WE STILL SUBMIT THEM?

Yes. Either a disclaim or a CPSC Product Registry entry with exemption codes *should* be submitted. Without this data being provided it will not be clear upon import if the product missed proper entry, or if it was not required. This will lead to timely and costly holds at the port while customs contacts the importer to provide the answer and any required documentation needed. If data was provided up front then this will eliminate the need for any additional delays upon entry.

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HOW DO I KNOW IF MY PRODUCT REQUIRES CERTIFICATION AND EFILING?

Certification requirements are not new and requirements have been in place since 2008. If you are still unsure if your product requires certification, please visit the CPSC Regulatory Robot to answer various questions about your products and determine if certification is required. https://business.cpsc.gov/robot/

Any consumer product that is subject to a CPSC rule, ban, standard or regulation will continue to require certification in the form of a Certificate of Compliance. This data will need to be eFiled at the time of entry based on the new eFiling requirements.

ARE PRODUCTS MADE IN THE USA OUT OF SCOPE FOR EFILING?

Yes, domestic items made in the US do not require eFiling as they will not go through importing. They are however still within the scope of CPSC certification requirements. Appropriate Certificates of Compliance are still required for these items, they are just not required to be entered into the CPSC Product Registry or submitted to CBP's ACE system.

DOES EFILING IMPACT DE MINIMIS SHIPMENTS/IMPORTERS?

Yes, there are no exemptions for de minimis shipments. The Final Rule requires de minimis shipments that include finished goods that are regulated by CPSC to eFile.

DO I EFILE EACH SHIPMENT OR EACH PRODUCT?

eFiling, like certificates of compliance, is based on product, not shipments. If you import the same product multiple times, the same entry can be used just like the same certificate could be used today under CPSC certification requirements.

IF I AM NOT THE IMPORTER OF RECORD, WILL I BE ABLE TO SEARCH THE CPSC PRODUCT REGISTRY TO SEE IF MY SUPPLIERS HAVE SUBMITTED THE REQUIRED DATA FOR EFILING COMPLIANCE?

No, you will not be able to see all items that have been eFiled for other importers unless they specifically grant you access to be able to view their private Product Registry account. Once an account is setup with CPSC, only those granted the necessary permission will be able to see the data input into the account.

CAN WE DOWNLOAD DATA FROM THE PRODUCT REGISTRY ONCE IT HAS BEEN SUBMITTED?

Yes, data entered into the CPSC Product Registry can be exported into a CSV (Excel) file.

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I PLAN TO WORK WITH MY BROKER TO FILE A FULL MESSAGE SET. WHAT DATA NEEDS TO BE SUBMITTED INTO THE CPSC PRODUCT REGISTRY?

Submitting a Full PGA Message Set means that your CPSC certificate data will be entered directly into CBP's ACE System by your broker along with the required customs data. You will need to work with your broker on how they will obtain the certificate data electronically. If you will be utilizing the Full PGA Message Set option, you do not need to submit any data to the CPSC Product Registry.

BUREAU VERITAS' AUTOMATED SOLUTION FOR SEAMLESS CPSC EFILING COMPLIANCE

Bureau Veritas has been actively involved in the U.S. Consumer Product Safety Commission's (CPSC) eFiling initiative since the Alpha Pilot program launched in 2016. As an early participant, we have gained valuable insights and expertise to help guide our clients through this new reporting process.

We have developed a fully automated solution to streamline the eFiling requirements and ensure compliance. Our end-to-end understanding of the process allows us to deliver a seamless experience, from data preparation to real-time transmission of certificate information into the CPSC Product Registry. View more information on Bureau Veritas' eFiling Solution including a timeline, links to CSPC resources and more. Click to View.

For additional questions, contact Bureau Veritas at info@us.bureauveritas.com.

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