



United States

Consumer Product Safety Commission

eFiling

CPSC's new requirements for electronic filing of certificate data at imports

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***Disclaimer:** This presentation was prepared by CPSC Staff and may not necessarily reflect the views of the Commission.*

Agenda

- What products must be certified?
- What is eFiling?
- Why is CPSC implementing eFiling?
- What is the Beta Pilot?
- How will the certificate data be filed?
- How will CPSC and industry benefit?



What Must be Certified?

- Any product that is subject to a consumer product safety rule, ban, similar rule, standard, or regulation, and which is imported for consumption or warehousing, or distributed in commerce must be certified.
- Certification is the responsibility of the importer; however, importers and manufacturers should have a clear understanding of exactly which standards need to be met.
- Foreign manufacturers/suppliers should insist on a list of which mandatory and consensus standards apply.

Types of Certificates

- Children's Product Certificate (CPC) - the manufacturer or importer certifies that its children's product complies with all applicable children's product safety rules (bans, standards, similar rules, or regulations).

<https://www.cpsc.gov/Testing-Certification/Childrens-Product-Certificate-CPC>

- General Certificate of Conformity (GCC) – the manufacturer or importer that its general use product (non-children's product) comply with all applicable consumer product safety rules.

<https://www.cpsc.gov/Business--Manufacturing/Testing-Certification/General-Certificate-of-Conformity-GCC>



Products Requiring a Children's Product Certificate

Children's Products:	Hand-held Infant Carriers
ASTM F-963	Highchairs
Lead Paint	Frame Child Carriers
Lead Content	Gates and Enclosures
Small parts	Infant Bath Seats
Phthalates (child care)	Infant Swings
ATVs (Youth)	Infant Walkers
Activity Centers	Mattresses – Crib and Youth Size (open Flame)
Baby Changing Products	Mattresses – Crib and Youth Size (smoldering)
Bassinets and Cradles	Pacifiers
Bedside Sleepers	Paint and surface coatings
Bicycles (Youth)	Play Yards
Bicycle Helmets (Youth)	Portable Bed Rails
Bouncer Seats	Portable Hook-On Chairs
Booster Seats	Rattles
Bunk Beds	Sleepwear sizes 0-6X
Carpets and Rugs	Sleepwear sizes 7-14
Children's Furniture	Sling Carriers
Children's Folding Chairs and Stools	Small Parts
Clacker Balls	Soft Infant and Toddler Carriers
Clothing & General Wearing Apparel	Toddler Beds
Cribs	Toys
Dive Sticks	Toys with Magnets
Electrically Operated Toys/Articles	Wearing Apparel – Children's
	Vinyl Plastic Film in Children's Apparel

Products Requiring a General Certificate of Conformity

Architectural Glazing	Lawnmowers
Artificial Emberizing Materials*	Lawn Darts*
ATVs	Matchbooks
Bicycles	Mattresses (open Flame)
Bicycle Helmets	Mattresses (smoldering)
Bunk Beds	Metal Candle Wicks*
Candles with Metal Wicks	Multi-purpose Lighters
Carpets and Rugs	Paint and Similar Surface Coatings*
CB Antennas	Packaging Subject to the Poison Prevention Packaging Act
Cellulose Insulation	Portable Gas Containers
Cigarette Lighters	Pool and Spa Drain Covers
Contact Adhesives	Refuse Bins*
Consumer Patching Compounds*	Refrigerator Doors
Drywall	Swimming Pool Slides
Fireworks	Vinyl Plastic Film
Garage Door Openers	Wearing Apparel (Flammability)
Inclined Infant Sleep Products*	

*Products subject to ban
Updated 9/2/2022

<https://cpsc.gov/Business--Manufacturing/Testing-Certification>



Certificates Must include

Identification of the finished product

Party certifying compliance

Each consumer product safety rule to which the finished product has been certified

Date and place the finished product was manufactured

Date when and place where the finished product was most recently tested for compliance

Contact information for person maintaining test records

What is eFiling?

eFiling is a CPSC initiative to enable importers of regulated consumer products to file electronically (eFile) with U.S. Customs and Border Protection (CBP) certain data elements from a certificate of compliance, via a Partner Government Agency (PGA) Message Set.

Why eFiling?

Currently, CPSC only asks for certificate data once a product has been identified for exam and, therefore, cannot use certificate data in its risk assessment and targeting in advance of a shipment arriving. Once rulemaking is completed, importers of regulated consumer products will electronically file certain certificate of compliance data elements with CPSC via the PGA Message Set at Entry, or at Entry Summary if both Entry and Entry Summary are filed together.



History


2008 CPSIA requires importers to test and certify children's and other general use products and provide certificates upon request (Codified under 16 CFR 1110).


2013 NPR published that would, among other things, require the electronic filing of certificates of compliance at the time of entry.


2016 Alpha Pilot conducted with eight participants that tested the PGA Message Set and Product Registry.


2017 Certificate Study analyzed risk potential of certificate data elements.


2020 Commission approves of Staff Briefing Package and Beta Pilot.

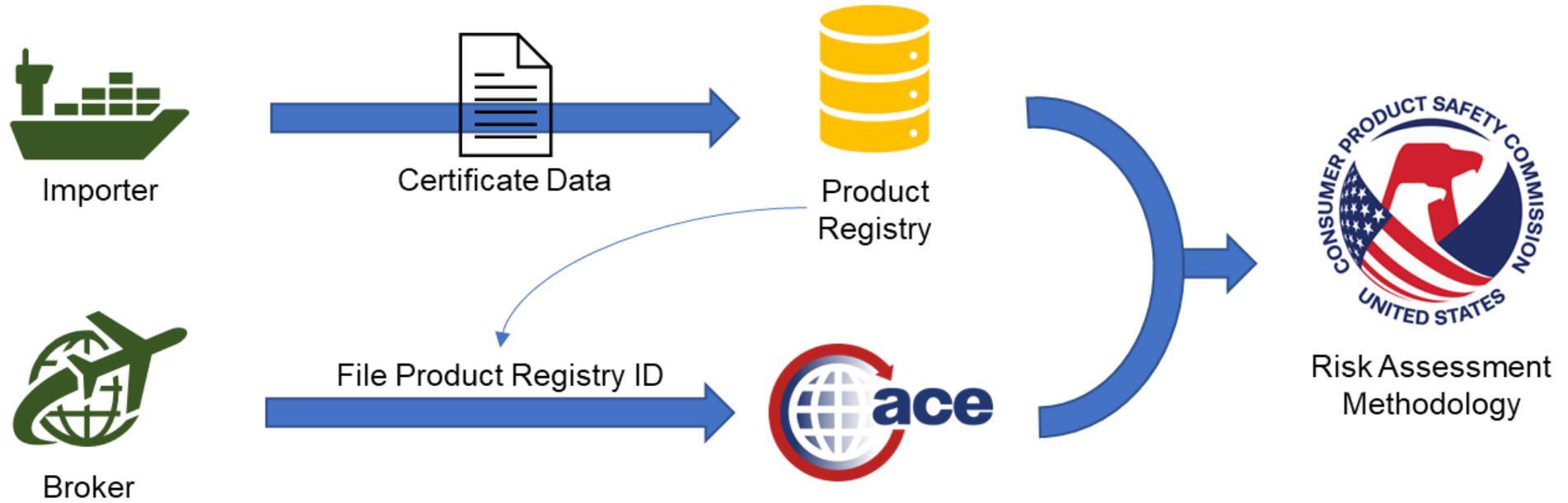


What is the Beta Pilot?

- CPSC will conduct a Beta Pilot test, in conjunction with CBP, scheduled to begin in **fall 2023**.
- The Beta Pilot test will include up to **50 volunteer participants**, allowing for **more entry lines** than the Alpha Pilot test and for CPSC to develop, test, and implement processes and procedures for an eFiling requirement for imported, regulated consumer products.



Option 1: Reference Message Set



Option 2: Full Message Set



Creating a Business Account & Product Collection*

eFiling > Company information Jane Doe

Company Information EDIT

Name: Storm Imports
Email: compliance@stormimports.com
Phone number: 555-555-1234
Website: www.stormimports.com
Importer ID: 256-7325

Company Account Admins ADD A USER

User ID	Name	Phone	Role	Company	
jane@stormimports.com	Jane Doe	555-555-1134	Account Admin	Storm Imports	EDIT

Company Product Collections CREATE A REGISTRY

Name	No. of Products	Users
No product collections have been created yet		

*Screenshots are for demonstration purposes and are subject to change as development continues

Adding Products to a Collection*

eFiling > Storm Solutions products > Add Products Jane Doe

Dashboard

Registries

Help

Settings

Product ✔Testing ○Attestation ○

Product Details

Product Name* ? Trade/Brand Name* ?

Product ID Type* ? Product ID* ?

Additional Product ID and Type

UPC	1212-2342
SKU	1212212342
UPC	1212-2342
SKU	1212212342

[+ ADD PRODUCT IDENTIFIER](#)

Product Description

Save and close

**Screenshots are for demonstration purposes and are subject to change as development continues*

Editing Products in a Collection*

eFiling > Storm Solutions products Jane Doe

Company name: Storm Solutions Certifier ID: Storm-Imports-West INVITE A USER MANAGE USERS

STORM SOLUTIONS PRODUCTS

Import Export ADD PRODUCTS

Select All Bulk Actions Search All Enter a date range Status Complete

MM/DD/YYYY - MM/DD/YYYY

Product ID	Product Name	Version	Trade/Brand Name	Last Test Date	Manufacturer Name	Status																							
<input type="checkbox"/> 5895-9946	Brown Coffee Table	HE6KE7	AromaStore	4/14/2023	Graph Matic	Complete	Actions																						
<div style="display: flex; justify-content: space-between;"><div>Product Details<p>Additional IDs:</p><table border="1"><tr><td>UPC</td><td>765234823</td></tr><tr><td>SKU</td><td>927364382</td></tr><tr><td>UPC</td><td>590467393</td></tr></table><p>Product / Model Description: Coffee table Product / Model Color: Brown Product / Model: Brown Modern</p></div><div>Manufacturer Details<p>Manufacturer Name: Graph Matic Manufacturer GLN: Manufacture Date: 2/14/2023 Production Start Date: 4/14/2023 Production End Date: 8/14/2023</p></div><div>Testing Details<table border="1"><thead><tr><th>Lab Name</th><th>CPSC ID (if accredited)</th><th>Citation Codes</th><th>Test Date</th></tr></thead><tbody><tr><td>Vartest Laboratories, Inc.</td><td>1203C</td><td>19463, 45343</td><td>05/16/2023</td></tr><tr><td>Cypress Laboratories</td><td></td><td>19882</td><td>05/16/2023</td></tr><tr><td>Clara Laboratories, Inc.</td><td>1345C</td><td>34587</td><td>05/16/2023</td></tr></tbody></table><p>Certificate: GCC Attestation Complete: Yes</p></div></div>								UPC	765234823	SKU	927364382	UPC	590467393	Lab Name	CPSC ID (if accredited)	Citation Codes	Test Date	Vartest Laboratories, Inc.	1203C	19463, 45343	05/16/2023	Cypress Laboratories		19882	05/16/2023	Clara Laboratories, Inc.	1345C	34587	05/16/2023
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<input type="checkbox"/> 5828-6922	Heavy Duty Storage Shelving	69RIHC	Repair Group Co	4/6/2023	Altra Systems	Expired	Actions																						
<input type="checkbox"/> 2649-3447	Hawaiian Shirts	PN3IZ3	Konex	4/26/2023	Armstrong and Sons	Complete	Actions																						
<input type="checkbox"/> 8755-5243	Shaggy Rugs	08BL01	Harber-Hilpert	11/30/2023	Cole Ltd	Complete	Actions																						
<input type="checkbox"/> 4438-2579	Vanilla Candle	ECS7OS	Wyman LLC	12/8/2023	Boyer LLC	Complete	Actions																						
<input type="checkbox"/> 2536-3948	Leather Crossbody Bags	QY0APQ	Shanahan Inc	2/28/2023	Haag Group	Complete	Actions																						

Results: 200 Items per page: 10 Page 1 of 20

*Screenshots are for demonstration purposes and are subject to change as development continues

Inviting a User to Collaborate*

The screenshot displays the eFiling interface for 'Storm Solutions products'. The user is logged in as Jane Doe. The main content area shows a table of products with columns for Products ID, Version#, Description, and Status. A modal dialog titled 'Invite a User' is open, allowing the user to enter an email address (jack@stormimports.com) and a role (Editor). The dialog has 'SEND INVITATION' and 'CANCEL' buttons.

Company name: Storm Solutions Certifier ID: 123-2323

STORM SOLUTIONS PRODUCTS

Import Export ADD PRODUCTS

Select All Bulk Actions Search All Enter a date range Status Complete

Products ID	Version#	Description	Status
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Complete
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Complete
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Complete
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Complete
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Incomplete
<input type="checkbox"/> 1234-1212	1.2	ipsum dolor sit amet...	Incomplete
<input type="checkbox"/> 1234-1212	1.2	Furniture Storm Solutions 11/22/22 Lorem ipsum dolor sit amet...	Incomplete
<input type="checkbox"/> 1234-1212	1.2	Furniture Storm Solutions 11/22/22 Lorem ipsum dolor sit amet...	Incomplete
<input type="checkbox"/> 1234-1212	1.2	Furniture Storm Solutions 11/22/22 Lorem ipsum dolor sit amet...	Incomplete
<input type="checkbox"/> 1234-1212	1.2	Furniture Storm Solutions 11/22/22 Lorem ipsum dolor sit amet...	Incomplete

Results: 200 Items per page: 10 Page 1 of 20

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What are the eFiling Benefits?



Reduction in Risk Score

- Beta Pilot participants may see a **reduction of their risk score** over time based on the amount of data provided
- Reductions in Risk Scores may result in **reduced hold times** and **fewer exams** which may reduce costs to the importer



Greater Focus on Higher Risk Products

- CPSC's increased focus on higher risk shipments will **result in fewer holds to check for certificates**
- Holds will be more likely **performed for substantial violations** rather than for certificates as certificate data will be provided ahead of time
- Fewer holds may result in **reduced costs to the importer**

Thank You!

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