BUREAU VERITAS

CPSC EFILING

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CONFIDENTIALITY

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AGENDA

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Let's Clarify
(Misunderstandings and FAQs)

WHAT IS EFILING?

- **Per CPSC:** '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'

- **Translation for Importers: electronically filing your COC's**
  - It is NOT sending or emailing existing COC's to CPSC/CBP
  - It is digitizing the COC process by creating data elements for each COC required field and populating that in the CPSC Product Registry/CBP Automated Commercial Environment (ACE) platform

WHY EFILING?

I Allow CPSC to import shipments efficiently AND support focused targeting efforts

I Per CPSC, key industry benefits include:
  I Greater focus on higher risk products **Key benefit**
  I Reduced risk scores for compliant importers
  I Fewer holds pending certificates
  I Reduced hold time
 I Fewer exams at the port
  I Reduced cost to importers

HOW TO EFILE

2 options for PGA message sets:

Option 1:

Full PGA message set- certificate data is entered by broker along with the required customs data directly into CBP ACE System each time a product is imported. ACE sends data to CPSC's Risk Assessment Methodology (RAM) system to target high risk products

*Note: this option is only valid if your broker has the data to file a full message set
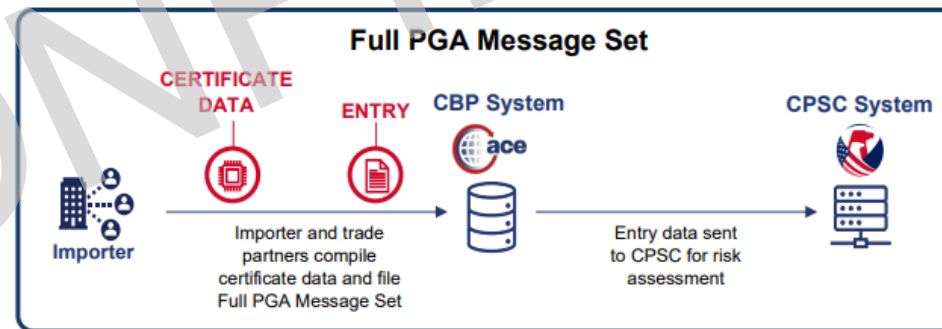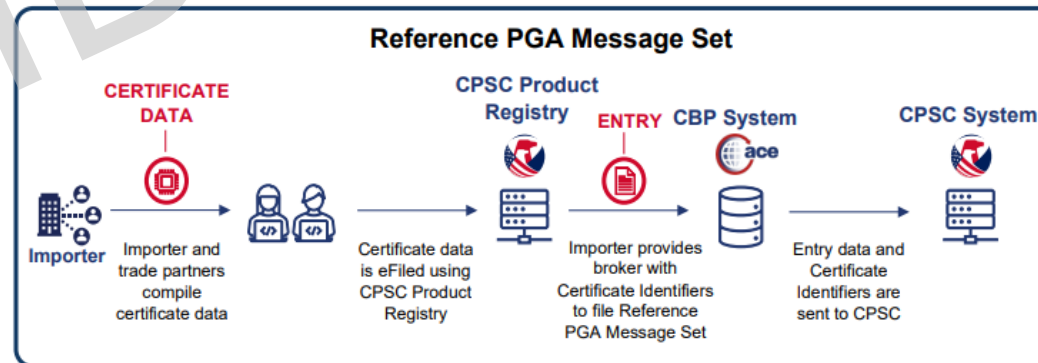
HOW TO EFILE

2 options for PGA message sets:

Option 2:

Reference PGA message set- certificate data is entered into CPSC's Product Registry to create a 'Registry ID' consisting of a Certifier ID, Product ID and Version ID. These 3 elements are the 'reference' to be submitted by brokers into the ACE system each time a product is imported. ACE then sends data to CPSC's RAM system to
target high risk products

Reference PGA Message Set

HOW TO EFILE

3 key 'Certificate Identifiers' that makeup a 'Registry ID' for brokers:

- Certifier ID: Unique identifier created by the importer who is responsible for certifying product certificates. This is created when setting up Product Registry.
  - *Ensures correct importer is linked to the COC*
  - *Example: BureauVeritas*

- Product ID: Unique identifier for the product that is being certified
  - *1 of 7 options: GTIN, SKU, UPC, Model #, Serial #, Registered #, Alternate ID*

- Version ID: Unique identifier for the specific version of the product certificate
  - *Unique to the Primary Product ID*
  - *A new Version ID is required when an existing COC requires update (ie: compliance renewal), material change, new batch of products, different factory used, edits to COC required, etc.*

WHO IS RESPONSIBLE TO EFILE?

IMPORTERS

- The ultimate party responsible for eFiling is the importer responsible for product certification.

- This is the party who is listed on current COCs as the Importer of Record.

- Importers are responsible to identify CPSC regulated products that fall within the scope and to manage and oversee the flow of data for eFiling.

- Trade partners should all understand the mandatory standards and requirements that need to be met.

  - *Trade partners include but are not limited to brokers, testing laboratories, manufacturers and software developers*

TRADE PARTNERS

Trade Partner	Responsibility
Importer	Manage and oversee flow of data and the eFiling process to prepare for entry
Testing Laboratory	Gather, test and transmit test report information
Broker	Collaborate, communicate and file certificate data on behalf of importer
Manufacturer	Provide all manufacturing details for applicable products subject to CPSC regulations
Software Developer	Develop, execute and collaborate to integrate technical solutions

CPSC PRODUCT REGISTRY

- **Multiple options for entering data into the CPSC Product Registry:**
  - Manual input- someone manually logs into the registry and manually inputs all data elements for each certificate one at a time for every product ID
  - Batch upload- someone manually logs into the registry then imports a .csv file that is formatted using comma-separated value template to capture multiple certificates
  - Application Programming Interface (API)- build an API connection to the registry that will allow instantaneous delivery of certificate data

CPSC PRODUCT REGISTRY

How to choose an input method?

- Manual input- recommended for those who only import a very small number of items

- Batch upload- recommended for those who import a small number of items (a few dozen)

- Application Programming Interface (API)- recommended for those who import a large amount of items (majority of US retailers fall into this option)

WHAT DATA IS REQUIRED?

Required Certificate of Compliance Data Elements

Product ID
Identification of the finished product

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

Manufactured Date
Date when the finished product was manufactured

Manufactured Location
Place where the finished product was manufactured, produced, or assembled, including the (1) name; (2) full address; and (3) contact information of the manufacturing party

Product Test Date
Date when the finished product was most recently tested for compliance

Test Lab
Party(ies) used for testing a certificate per 16 CFR Part 1110, including (1) name, (2) full address, and (3) contact information of testing entity
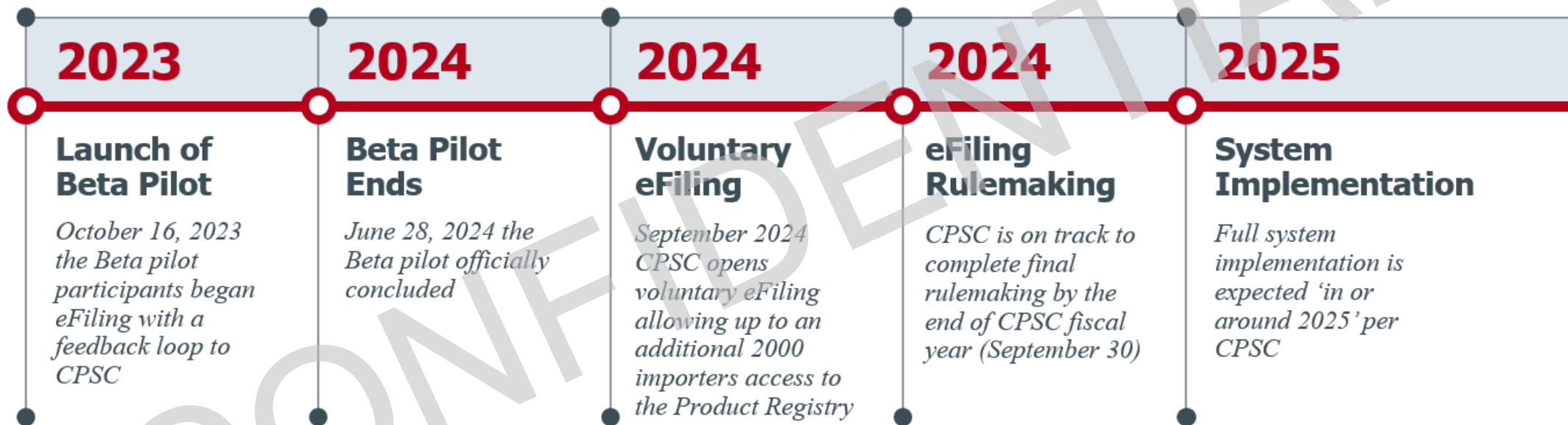
Point of Contact
Contact information for the party maintaining records of test results, including (1) name, (2) full address, and (3) contact information

TIMELINE

2023	2024	2024	2024	2025
Launch of Beta Pilot	**Beta Pilot Ends**	**Voluntary eFiling**	**eFiling Rulemaking**	**System Implementation**
October 16, 2023 the Beta pilot participants began eFiling with a feedback loop to CPSC	*June 28, 2024 the Beta pilot officially concluded*	*September 2024 CPSC opens voluntary eFiling allowing up to an additional 2000 importers access to the Product Registry*	*CPSC is on track to complete final rulemaking by the end of CPSC fiscal year (September 30)*	*Full system implementation is expected 'in or around 2025' per CPSC*

BEST PRACTICES

| **Here are a few eFiling implementation best practices as recommended by CPCS directly:**

- | Define CPSC eFiling requirements early. Set clear measureable and specific goals.

- | Establish integrated communication channels. Set defined roles and responsibilities among stakeholders at each step.

- | Develop technical solutions to enable data flow. Gather requirements and implement solutions as soon as possible.

- | Consider the level of time, staff support and resources required.

- | Identify the coordinated eFiling model that works for your business. Make decisions that work best for you and communicate these to trade partners.

BEST PRACTICES

Stages of implementation

Stage 1: Learn, Define, Communicate

- *Gain a deeper understanding of eFiling and adjustments required for compliance. Collect information from key stakeholders, define roles, identify problems + solutions, determine steps required before full eFiling implementation.*

Stage 2: Integration and Development

- *Develop processes and systems required to comply with eFiling based on decisions and understandings from Stage 2. This stage is where data collection requirements and processes are established.*

Stage 3: Implementation and Improvement

- *After all teams have been assembled, development has been completed and all stakeholders are ready to begin testing the system and process with real data.*

BEST PRACTICES

| For additional information, including a task checklist for each stage, please review the CPSC eFiling Quick Start Guide (www.cpsc.gov/eFiling)

United States
Consumer Product Safety Commission

eFiling Quick Start Guide

July 2024

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NEXT STEPS

- **Start internal conversations with your import compliance/customs team**
  - Bring in brokers to these discussions
  - eFiling is a collaborative effort between product and customs compliance

- **Digitize your data !!**

- **Be sure you are managing your trade parties**
  - If you do not have an ID (ie: factory ID) in your programs today, start now with implementing one

NEXT STEPS

I **Take advantage of the voluntary eFiling**

I Interested importers should email eFilingSupport@cpsc.gov

I Include Company Name, Initial Business Account Administrator's Name and Email, Importer of Record Number(s), Broker Filer Code(s), type of products imported

I This is a phased invite. First come, first served.

I **Bookmark and review www.CPSC.gov/eFiling**

I Sign up for eFiling mailing list

I Review CPSC Product Registry Training Videos

I Review CPSC eFiling Document Library

INDUSTRY MISUNDERSTANDINGS

- **"Efiling is handled by my customs dept. so I don't need to do anything on the QA/Compliance side."**
  - False: Both customs and QA/Compliance data is required.

- **"I can just upload a PDF GCC certificate to the CPSC registry."**
  - False: Under the new guidelines the CPSC doesn't offer a solution in their database to use any form (ie. PDF, MS Word) of an actual certificate. The registry requires that the data fields from the certificate be entered into the registry."

- **"I don't sell toys, so I don't have to worry about this."**
  - False: Certificates are required for all products under the CPSC that contain a rule, standard or ban.

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FAQS

l **Who is responsible for eFiling?**

   l The importer is the responsible party.

l **When will Voluntary eFiling begin?**

   l CPSC is implementing a phased invite schedule over the next several months. As importers email eFilingSupport@cpsc.gov with interest, they will be added to the queue for invite.

l **What is the product scope for eFiling?**

   l Any product that requires a COC (GCC or CPC) today will require eFiling. The scope of products is not changing. If you are unsure if your product requires a COC, please utilize the regulatory robot at https://www.cpsc.gov/Business--Manufacturing/Regulatory-Robot/Safer-Products-Start-Here

EFILING OVERVIEW, ONESOURCE CONNECT ACADEMY

HTTPS://LEARN.ACADEMY.ONESOURCECONNECT.COM/CATALOG/INFO/ID:733

Compliance can be complicated. BV can help !
If you have further questions or are looking to move forward on how BV can support your company with eFiling, we are happy to discuss our solution with you directly.

Find additional resources using the QR code below or contact us at info@us.bureauveritas.com

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Shaping a World of Trust

Shaping a World of Trust