

CPSC & E-Filing

CPSC & E-Filing: Is Your Company Ready for July 8, 2026?



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CPSC & E-Filing: Who Must Certify/File

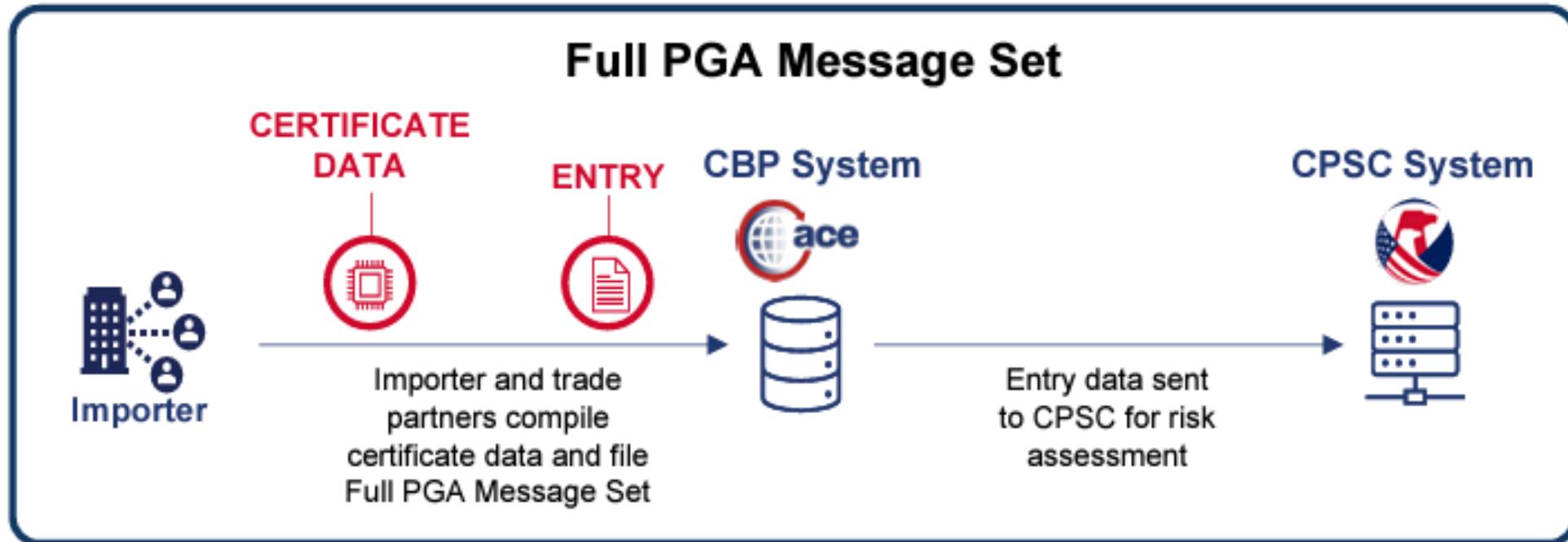
- PART 1110—CERTIFICATES OF COMPLIANCE
 - 1110.7 Who must certify finished products.
 - (a) Importers. Generally, a finished product manufactured outside of the United States must be accompanied by a certificate and the importer must issue the certificate. eFiling is required for each importer.
 - The importer of record; who may be an owner, purchaser, or authorized customs broker. A party who has a financial interest in imported finished products for which CPSC certificate data required. **If the importer of record is a customs broker, the customs broker may identify the owner, purchaser, or consignee.**
 - E-Filing is required for each finished product
 - (b) Domestic Manufacturers & Private Labelers. **Do not have to eFile** because the products are not imported. if a finished product manufactured in the United States is privately labeled, the private labeler must issue a certificate that meets the requirements, unless the manufacturer issues the certificate.
- E-filing is only required for “finished products”
 - E-filing is not required for component parts or replacement parts (unless sold separately)

CPSC & E-Filing: What are the Required Data Points for E-Filing?

- What information is required for eFiling?
 - 1) Identify the finished product(s) covered by the certificate;
 - 2) state each consumer product safety rule to which the product is being certified;
 - 3) identify the party certifying compliance of the finished product(s);
 - 4) identify and provide contact information for the individual maintaining the certificate's records;
 - 5) provide the date and place where the finished product(s) were manufactured, produced, or assembled;
 - 6) provide the most recent date and places where the finished product(s) were tested for compliance with the rule(s), ban(s), standard(s), or regulation(s) cited in § 1110.11(a)(4); and
 - If using component part testing, must also include component part testing information
 - 7) an attestation certifying the finished product(s) covered by the compliance certificate.

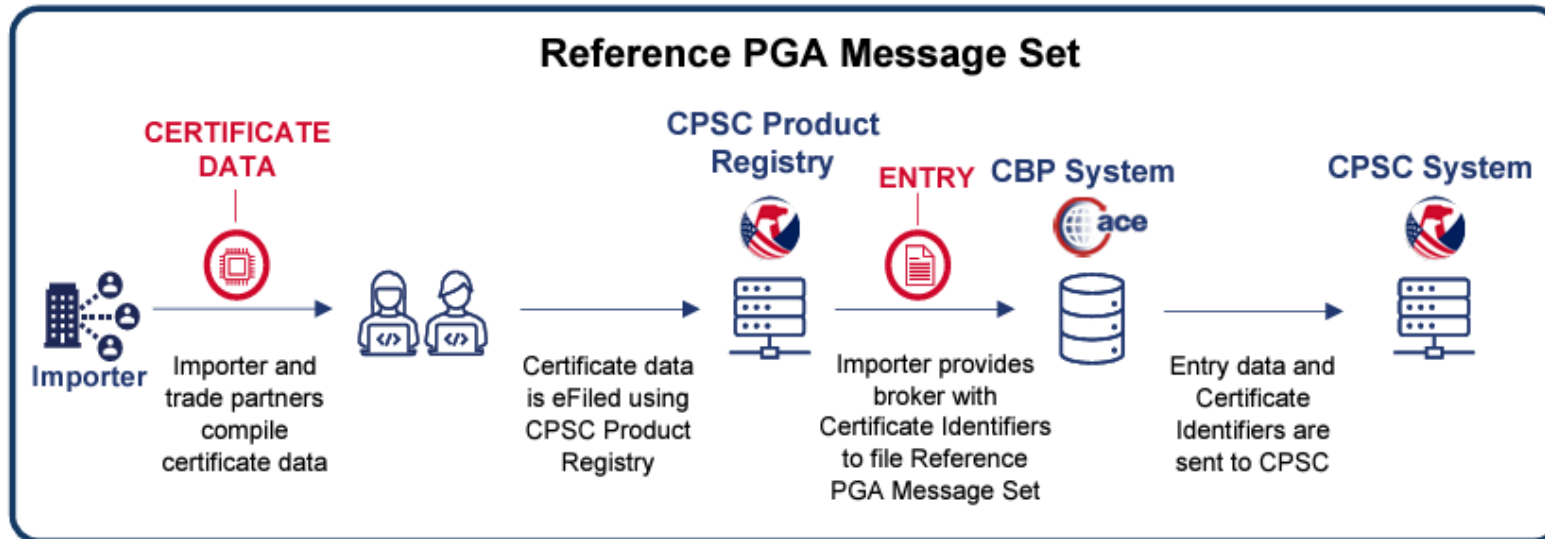
CPSC & E-Filing: Full PGA Message Set (Option #1)

- **Full PGA Message Set:** 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.



CPSC & E-Filing: Reference PGA Message Set (Option #2)

- **Reference PGA Message Set:** The importer pre-enters the certificate data into the CPSC Product Registry (developed and maintained by CPSC) 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.



*There are manual input (small importers), batch upload (import a few dozen), and API (everyone else) options available for entering data into CPSC's product registry

CPSC E-Filing: Disclaimers & Exclusions

Other Questions | What is the difference between a testing exclusion and a disclaimer?

Use a testing exclusion code when a certificate is required for the product, but the product is not required to be tested to a specific performance requirement in a rule based on an exemption, exception, or determination in the underlying rule. More information can be found in the eFiling Beta Pilot Citation Testing Exclusion and Disclaim Guidance document found in the [eFiling Document Library](#). Use a disclaimer when no certificate is required for the product because the product is not within CPSC's jurisdiction; is not subject to a rule, ban, standard, or regulation that requires certification; or because the Commission has issued an enforcement discretion for the product (i.e., certain refrigerators and adult wearing apparel). Instead of filing a Full or Reference Message Set, a Disclaim Message Set is filed.

Exclusion Code

- (c) The following products are exempt from the scope of the ban established by part 1303 (no cautionary labeling is required):
- (3) Metal furniture articles (but not metal children's furniture) bearing factory-applied (lead) coatings.



Disclaimer Code

- (d) The following materials do not exceed the lead content limits under section 101(a) of the CPSIA provided that these materials have neither been treated or adulterated with the addition of materials that could result in the addition of lead to the product or material:
- (4) Wood.
- (5) Paper and similar materials made from wood or other cellulosic fiber, including, but not limited to, paperboard, linerboard and medium, and coatings on such paper which become part of the substrate.
- (6) CMYK process printing inks (excluding spot colors, other inks that are not used in CMYK process, inks that do not become part of the substrate under [16 CFR part 1303](#), and inks used in after-treatment applications, including screen prints, transfers, decals, or other prints).

CPSC E-Filing: Enforcement

- What does CPSC staff consider when there is inaccurate information in a certificate?
 - Currently, before issuing a violation, CPSC staff considers whether any inaccurate information on the certificate was deliberate, or inadvertently erroneous.
 - CPSC at the Ports: “One Strike and You’re Out” (enforcement discretion fades after first violation)
- What are some ways in which CPSC may penalize firms for noncompliant certificates?
 - Enforcement for noncompliant certificates includes a range of options, such as increasing an importer’s risk score, which increases the risk of a hold for examination, and rejecting an entry that lacks certificate data, contains incomplete or inaccurate information, or lacks a disclaimer message if no certificate is required for a flagged HTS code.



CPSC & E-Filing: Voluntary Stage & Timing



CPSC's eFiling Program

A MODERN APPROACH TO FILING CERTIFICATE DATA

What is eFiling?

An initiative that will enable importers of regulated consumer products to electronically file (eFile) data elements from a certificate of compliance via a Partner Government Agency message set. eFiling will establish a streamlined, standardized process for importers that allows CPSC to analyze shipments more efficiently and increase focus on higher risk products, keeping Americans safe.

When does eFiling take effect?

July 8, 2026 for most **regulated** consumer products. Requirements for **regulated** consumer products entered into a Foreign Trade Zone (FTZ) will apply on **January 8, 2027**.



What are the Benefits for the Trade?

- Lower risk score with compliance
- Reduced hold times for compliant products
- Fewer examinations
- Reduced costs for importers
- Enhanced certificate data management process

Why Join the eFiling Voluntary Stage?

- **Risk-free** to participate
- **No shipping delays** if errors are made during this stage
- **Learn and adapt** before full implementation
- Your team can **hit the ground running** when requirements are **mandatory** in July 2026

Join the over **400 importers** who have been invited to the voluntary stage, and begin eFiling today!

Self-Registration is now Open!

CPSC has launched Self-Registration for the voluntary stage, allowing importers and trade partners to begin participating immediately.

Don't wait – Register TODAY!

Scan the QR code below to get started:



CPSC & E-Filing: Will it Happen?



1800 Federal Register / Vol. 90

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1110

[CPSC Docket No. 2013-0017]

Certificates of Compliance

AGENCY: Consumer Product Safety Commission.

ACTION: Final rule.

SUMMARY: In consultation with U.S. Customs and Border Protection (CBP), the U.S. Consumer Product Safety Commission (Commission or CPSC) issues this final rule (the Final Rule) to revise the agency's regulation for Certificates of Compliance (certificates). The Final Rule aligns CPSC's current certificates rule with other CPSC rules on testing and certification, and implements, for importation of products and substances regulated by CPSC, electronic filing of certificates (eFiling) with CBP.

DATES: For all CPSC regulated consumer products and substances subject to the Final Rule and required to be certified, except for products and substances imported into a foreign trade zone (FTZ) and subsequently entered for consumption or warehousing, the Final Rule is effective on July 8, 2026. For CPSC regulated products and substances entered from an FTZ for consumption or warehousing, the Final Rule is effective on January 8, 2027.



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

STATEMENT OF COMMISSIONERS PETER A. FELDMAN AND DOUGLAS DZIAK SUPPORTING THE FINAL RULE ON ELECTRONIC FILING

DECEMBER 18, 2024

eFiling targets de minimis foreign e-commerce shipments that threaten American families

Today the U.S. Consumer Product Safety Commission (CPSC) approved a final rule to implement electronic filing of certificate of compliance data at import. eFiling will improve CPSC's ability to target higher risk products for screening and interdiction. At the same time, it will reduce inspection delays and allow compliant products to clear the entry process more efficiently. This initiative is the result of more than a decade of work and study.

America faces a flood of foreign direct-to-consumer shipments, and the tide is rising. These e-commerce shipments often originate from countries that do not respect U.S. safety laws. At the same time, CPSC has a limited capacity to monitor the millions of small parcels that enter the U.S. marketplace duty free each day under the *de minimis* exemption. As the U.S.-China Economic and Security Review Commission [noted recently](#), many Chinese companies are able to sell unsafe goods directly in the U.S. market and are unlikely to ever be found out, let alone held accountable for the harm their products cause. eFiling helps to change that.

This rule does not create additional testing and certification burdens for firms. Importers already must provide testing certificates in paper format upon request. This new rule will bring the Commission's tracking and targeting system into the 21st century by requiring electronic filing of certificate data. In doing so, this rule will make it more difficult for foreign manufacturers who ignore existing testing and certification requirements to evade detection.



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STATEMENT ON THE WITHDRAWAL OF COSTLY, UNSUPPORTED, AND ANTI-COMPETITIVE RULEMAKINGS THAT DO NOT ADVANCE SAFETY

AUGUST 20, 2025

Today marks a turning point for the U.S. Consumer Product Safety Commission (CPSC). Under new leadership, CPSC is returning to a safety mission rooted in sound science, robust data, and common sense. CPSC has identified several proposed rulemakings that have remained on the agency's rulemaking agenda for years without final action. CPSC has also identified instances where Congress has provided clear direction to the Commission to not finalize specific rules. Regulations and practices that do not reasonably advance safety – but instead promote unscientific ideological agendas, impose unnecessary costs, restrict consumer choice, or reduce competition, entrepreneurship, and innovation – are no longer agency priorities.

In that spirit, the Commission is withdrawing several pending rulemakings where it does not intend to issue final rules, including:

- [Safety Standard Addressing Blade-Contact Injuries on Table Saws](#) (76 Fed. Reg. 62678);
- [Standard for Recreational Off-Highway Vehicles](#) (74 Fed. Reg. 55495);
- [Safety Standard for Debris Penetration Hazards](#) (87 Fed. Reg. 43688);
- [Information Disclosure Under Section 6\(b\) of the Consumer Product Safety Act](#) (79 Fed. Reg. 10712);
- [Disclosure of Interests in Commission Proceedings](#) (88 Fed. Reg. 67127); and
- [Banned Hazardous Substances: Aerosol Duster Products Containing More Than 18 mg in Any Combination of HFC-152a and/or HFC-134a](#) (89 Fed. Reg. 61363).

In addition, the Commission has directed staff to take necessary steps to rescind two outdated rules governing citizens band radio antennas, which have no relevance to modern consumer products, and Eisenhower-era refrigerator safety mandates aimed at models that have not been produced in over 50 years. The Commission is also rescinding its ill-conceived and methodologically suspect guidance on the value of statistical life, which departs from the practices of *every other* federal agency, inflates claimed regulatory benefits, and jeopardizes the legal viability of any rulemaking that relies on it.

CPSC & E-Filing: Will it Happen?



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CPSC SETS NEW RECORD FOR SAFETY NOTICES, PROTECTING AMERICAN FAMILIES AND LEVELING THE PLAYING FIELD FOR AMERICAN BUSINESS

MAY 15, 2025

Washington, DC – This week, the United States Consumer Product Safety Commission (CPSC) issued 28 separate product safety recalls and warnings. This is a new agency record and more than double the agency’s previous weekly high for safety warnings.

Nearly all the recalls and warnings issued this week involve products manufactured in the People’s Republic of China. They include results from CPSC’s first-of-its-kind enforcement sweep of off-brand Chinese faucets found to leach lead and other contaminants into U.S. drinking water. Additional action is expected in the coming weeks.

Since President Trump’s inauguration, CPSC has renewed its focus on its core mission: protecting American families. This change in course – ending wasteful DEI initiatives and cancelling overseas trainings that advance Chinese interests, for example – is making Americans safer.

“CPSC remains hard at work to protect consumers,” said Acting Chairman Peter Feldman. “We will always put Americans first.”



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ACTING CHAIRMAN PETER A. FELDMAN

CONTINUITY OF CPSC SAFETY OPERATIONS

AUGUST 19, 2025

In anticipation of the end of Commissioner Dziak’s holdover year in October, the U.S. Consumer Product Safety Commission (CPSC) is taking steps to maintain continuity of operations and avoid disruption to its safety mission. Over the last several weeks, Commissioner Dziak and I have worked with Commission staff on plans, including directives and delegations of authority, to ensure Commission efforts to protect the public will continue without interruption. CPSC remains fully empowered and unwavering in our mission to safeguard American families. These plans leave the Commission stronger, and CPSC will not hesitate to deploy every tool at its disposal, including the full weight of our executive authority, to enforce our laws.

Under the Consumer Product Safety Act, Congress expressly empowered the Commission to delegate its authorities to officers and employees of the agency to maintain continuity of operations. This statutory authority is broad, allowing the Commission to delegate all its powers – for example, enforcement, regulatory, and administrative functions – to the Chairman and agency staff, with the sole exception of certain subpoenas. With these delegations in place, CPSC anticipates no impediment to our work going forward, including with respect to investigations. The agency has a strong, long-standing relationship with the Department of Justice, and we will continue to coordinate closely to protect American consumers, preserving the full force of our investigatory and enforcement tools.

CPSC & E-Filing: Will it Happen?



Record of Commission Action
Commissioners Voting by Ballot*

Commissioners Voting: Acting Chairman Peter A. Feldman
 Commissioner Douglas Dziak

ITEM:

Ballot Vote: Fiscal Year 2025 Proposed Operating Plan Alignment and Midyear Review
(Ballot vote package dated April 30, 2025)

DECISION:

The Commission voted unanimously (2-0) to approve the Fiscal Year 2025 Proposed Operating Plan Alignment and Midyear Review with the following specified changes:

"On Page 2, in Table 1, move the ITDS/RAM Cloud Migration project from the current rank of 8 to a rank of 3 and reorder the table accordingly."

CPSC Budget Priorities



Acting Chairman Peter A. Feldman

Pursuant to Section 27(k) of the Consumer Product Safety Act, 15 U.S.C. § 2976(k), the U.S. Consumer Product Safety Commission (CPSC) submits the following comments concurrently to the Office of Management and Budget (OMB) and Congress, as well as to the U.S. Department of Health and Human Services (HHS).

The President's FY 2026 Budget proposes to reorganize and transfer the functions of the Consumer Product Safety Commission to the HHS Office of the Secretary as the Assistant Secretary for Consumer Product Safety (ASCPS). Until the enactment of authorizing legislation to reorganize, the CPSC will continue to carry out its mission to protect the public from unreasonable risks of injury from consumer products as a standalone agency.

CPSC recommends that the budget, programs, and strategic goals set forward herein be used as a basis for ASCPS to model its future operations. Implementation plans for the savings and efficiencies arising from the integration of CPSC's function and mission into HHS will be developed contingent on the enactment of authorizing legislation.

The President's Budget requests \$135,000,000 for the Assistant Secretary for Consumer Product Safety, which is \$15,975,000 below the FY 2025 Enacted level for CPSC. This funding level supports 459 FTEs and operational costs. Under this scenario, reorganization within HHS would afford the new ASCPS an opportunity to realize additional savings associated with administrative and support functions and dedicate a higher portion of its FY 2026 request directly to safety operations beyond what CPSC can realize as a standalone entity.

Questions?

Cooley