

CPSC eFiling Readiness Prep List

KEY DATES & DEADLINES

- January 8, 2025 — Final Rule published for Certificates of Compliance (CoC) under 16 CFR 1110.
- Voluntary pilot participation remains open. Importers and trade partners already enrolled should verify registry data accuracy before mandatory launch.
- By late 2025 — All importers should have completed internal system validation and testing to ensure eFiling readiness.
- July 8, 2026 — Mandatory eFiling begins for most imported, regulated consumer products.
- January 8, 2027 — eFiling requirements expand to Foreign Trade Zone imports.
- Now through mid-2026 — Test your Product Registry setup, confirm broker integrations, and ensure automated data exchange with your labs and the CPSC.

ARE YOU TAKING THE RIGHT STEPS TO PREPARE FOR CPSC EFILING?

Use this list to assess readiness & plan your CPSC eFiling actions

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|---|--|
| <input type="checkbox"/> Are your internal teams aligned on eFiling (Product, Quality, Compliance, Legal, IT, Sourcing)? | <input type="checkbox"/> Are you tracking product or sourcing changes that might trigger a version update in the Product Registry? |
| <input type="checkbox"/> Have you mapped your current CoC creation process and identified changes needed to implement eFiling? | <input type="checkbox"/> Have you determined whether you will use the Full PGA or Reference PGA submission method? |
| <input type="checkbox"/> Have you created a CPSC Product Registry Business Account and entered data to learn the system? | <input type="checkbox"/> Do you have a plan to automate or streamline data entry (bulk upload, API)? |
| <input type="checkbox"/> Have you identified and mapped the data needed for eFiling? | <input type="checkbox"/> Have you or your service provider worked with the CPSC API for automated eFiling? |
| <input type="checkbox"/> Have you defined how you will assign and track Product IDs and Version IDs internally and within the Product Registry? | <input type="checkbox"/> Is your broker ready to submit Certificate Identifiers via the ACE system? |
| | <input type="checkbox"/> Have you verified your Product Registry CoC upload format with your broker or service provider? |

Texbase helps brands structure compliance data & implement eFiling workflows.

[Explore Texbase eFiling](#)

FREQUENTLY ASKED QUESTIONS:

Question: What is the benefit of participating in the eFiling voluntary stage?

Answer: CPSC strongly encourages importers to participate in the voluntary eFiling phase as a way to prepare ahead of full implementation. This stage gives importers and their trade partners time to learn the process, evaluate readiness, and begin testing eFiling in a lower-risk environment. There will be an initial learning curve, but moving through the implementation phases allows teams to identify gaps early, reduce errors, and gradually expand eFiling to more products before the requirement becomes mandatory.

Question: Will Participating in the eFiling voluntary stage or mistakes made in the voluntary filings of certificate data impact my risk score or cause shipment delays?

Answer: During the voluntary eFiling phase, shipments will continue to follow normal CPSC review processes. Errors made while submitting certificate data during this stage will not impact importer risk scores or trigger shipment holds. This phase is intentionally structured to give importers and their partners space to test, learn, and refine their approach without consequences for mistakes.

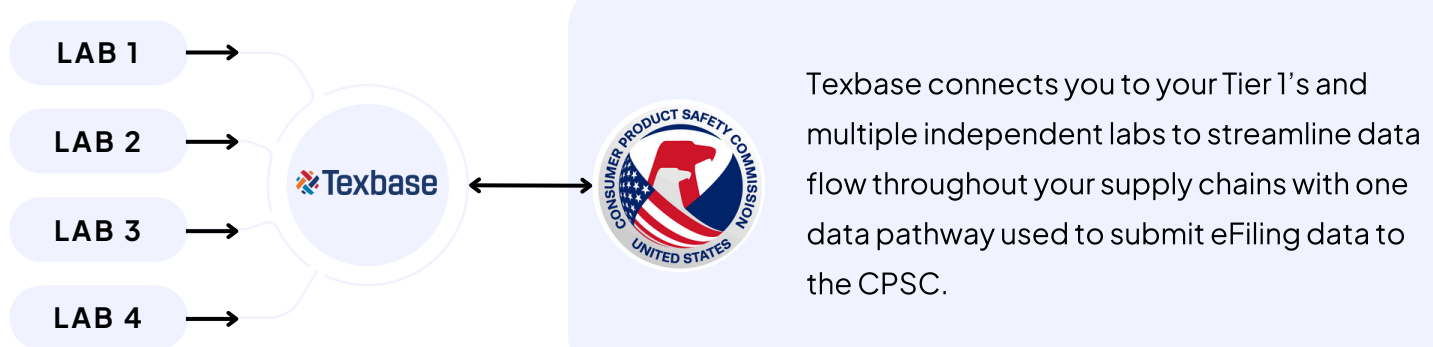
Question: What is the benefit of using the Product Registry and filing Reference PGA Message Sets?

Answer: Using the Product Registry and Reference PGA Message Sets is especially helpful for importers who bring in the same regulated products repeatedly under the same certificates. Instead of submitting certificate data for every shipment, product certificate information can be entered once in the Product Registry and reused for future imports. This approach allows teams to use manual or bulk uploads to streamline submissions, reduce repetitive work, and maintain consistency across shipments. As long as the certificate details remain the same, the same registered product certificate can be referenced each time the product is imported.

Question: Will CBP deny entry if importers fail to comply with eFiling?

Answer: At this time, CPSC does not plan to deny entry solely due to missing eFiling data. During early implementation, shipments are expected to receive warning messages rather than automatic rejections for missing PGA information. However, CPSC will continue enforcing certificate requirements and may request CBP action for non-compliant products. Certificate data submitted through eFiling may also be used to adjust shipment risk scores, helping reduce holds for compliant products and focus enforcement on higher-risk imports.

ARE YOU WORKING WITH MULTIPLE TESTING LABS?



RESOURCES

- [CPSC the Final Rule](#) (published January 8, 2025)
- [CPSC eFiling Change Log](#) (view the latest functional updates)
- [CPSC eFiling resources page](#)
- [CPSC Webinar: Six Months Until eFiling Implementation](#)

Need help optimizing your eFiling strategy? We're here to help.

[Get help with eFiling](#)