



CDHL EXPRESS  
FREQUENTLY ASKED QUESTIONS (FAQs)

# 2026 UNITED STATES REGULATORY CHANGES

Last Update: May 22nd, 2026

## GENERAL

### 1. What is the regulatory change?

Effective **July 8, 2026**, the U.S. **Consumer Product Safety Commission** (CPSC) is implementing a mandatory electronic filing (e-Filing) requirement for **Certificates of Compliance** (Children's Product Certificate (**CPC**) or General Certificate of Conformity (**GCC**)) for all regulated finished consumer products imported into the United States.

Importers (or their broker filer) must submit certificate data electronically in Customs Automated Commercial Environment (ACE) at time of entry using either the **Full Partner Government Agency (PGA) Message Set** (7 data elements from the certificate), the **Reference Message Set** (3 data elements) for products which have been registered on the CPSC Product Registry or the applicable disclaim indicator and intended use code.

To obtain the **Product Reference Message Set**, the importer or manufacturer responsible for certifying the products with the CPSC should establish a business account on the [CPSC website](#) and then will need to electronically register each of their products by entering information from their respective certificates of compliance (either CPC or GCC).

### 2. What are the data elements specific to the Full PGA Message Set and Reference Message Set?

The 7 required certificate data elements for the **Full CPSC PGA Message Set** (which can be found on the CPC or GCC) are:

1. **Product ID (as identified by the certifier/importer)**
2. **Citation data – reference to each applicable CPSC regulation (e.g., CPSIA sections, 16 CFR parts)**
3. **Date of manufacture**
4. **Place of manufacture (country, city/factory as applicable)**
5. **Date of most recent test**
6. **Testing laboratory information (CPSC-accepted lab, where applicable)**
7. **Records-keeper / point of contact information**

The 3 data elements for the **Reference Message Set** (for customers who leverage the Product Registry) are:

1. **Product ID – A unique identifier for the product being certified**
2. **Certifier ID – The unique identifier created by the certifying importer**
3. **Version ID – The unique identifier for the specific version of the product certificate**

### Why is this regulatory change happening?

CPSC is modernizing its import surveillance, enabling risk-based targeting by requiring electronic certificate data instead of manual, post-entry validation.

## IMPACT FOR SHIPPERS

### 3. What is the impact for shippers?

- Shippers from Rest of World to USA must provide either:
  - Full Certificate Data (7 elements) on the commercial invoice either in the line-item description field or in the remarks section on a standard DHL generated invoice template or
  - A copy of the CPC/GCC or
  - Product Registry Identifiers (Product ID, Certifier ID, Version ID) on the commercial invoice either in the line-item description field or in the remarks section or
  - Disclaim code and applicable intended use code on the commercial invoice either in the line-item description field or in the remarks section
- Must understand which CPSC rules apply to each individual part number/SKU (CPC vs GCC).
- Must ensure accuracy of testing, manufacturing, and applicable code of federal regulation [citation data](#)

### 4. What can shippers do to avoid delays?

To avoid delays, Shippers from Rest of World to USA shall:

- ✓ Provide certificate information, product registry identifiers, or disclaim code BEFORE the shipment arrives either by including the relevant information on the commercial invoice or by attaching the GCC or CPC certificates to the shipment documentation.
  - If using the CPC or GCC, DHL Express recommends either providing a copy of the respective certificate with each shipment or alternatively, customers can provide an addendum sheet with the relevant GCC or CPC data elements.
    - These documents can either be uploaded when shipping utilizing Paperless Trade or by tendering a copy of the documents along with the shipment commercial invoice and airway bill copy when the courier makes the pick-up
- ✓ Ensure harmonized tariff codes (HTS) codes are correct and check against the CPSC flagged list to ensure proper certifications and information are available for clearance teams.
- ✓ Ensure CPSC product testing and documentation are current and correct.

## IMPACT FOR RECEIVERS

### 5. What is the impact for receivers in USA?

- The US Importer of Record (IOR) is legally responsible for certificate accuracy.
- The US IOR must review their products against CPSC flagged HTS codes to understand which items will require the additional data elements to comply with July 8 go live of electronic CPSC filing
  - For products subject to CPSC, it is recommended that the IOR set-up a CPSC Product Registry business account and register their products in the **CPSC Product Registry**. Information on this process can be found here: [CPSC Product Registry | CPSC.gov](#)
- Know that the receiver will be contacted by DHL Express USA for missing CPSC information should the required data elements not be on file, provided with shipment documentation, or on the commercial invoice
  - Missing data may lead to delays in receiving full release from both U.S. Customs and CPSC.
- Must maintain valid CPC/GCC even when HTS code is not flagged
- Must have Power of Attorney on file with DHL Express USA if importing shipments with values above \$5,000 USD

### 6. What can receivers do to avoid delays?

To avoid delays, Receivers in USA shall:

- ✓ Confirm whether imported SKUs fall under the flagged HTS codes.
- ✓ Provide DHL Express with Product Registry IDs or Full 7 Data Elements prior to shipment arrival in the US. This can be done via the following:



- Providing a product database to their DHL account representative in advance of first CPSC subject shipment to forward on to the US Gateway Brokerage team to have on file in the Customer Master File (CMF); or
- Ensure all information is on the commercial invoice; or
- Applicable certificates or addendums are sent to the shipper to provide to DHL Express at time of shipment creation as part of shipment documentation
- ✓ Maintain updated certificates when manufacturing batches change.
- ✓ Prepare internal teams to respond to CPSC “Docs Required” and “Under Review” requests

## ADDITIONAL INFO

### 7. How do I know if my goods are subject to this new CPSC eFiling requirement?

You can check the CPSC’s website and review the list of HTS codes which will be flagged for CPSC eFiling as of July 8, 2026 here: <https://cpsc.gov/s3fs-public/CPSC-Guidance-and-HTS-List-for-Filing-of-Electronic-Certificates-6B-Cleared.pdf>

### 8. Does every CPSC regulated product require eFiling?

A product requires eFiling only if its HTS code appears on the CPSC flagged HTS list (which contains ~600 codes). If the HTS code is not on the list, eFiling is not required but the product may still be regulated under CPSC rules, and a valid CPC/GCC must be maintained by the IOR.

### 9. Why use the Product Registry?

The CPSC Product Registry is the most efficient and scalable method for complying with the eFiling requirements. Using the Registry reduces the amount of data required to clear CPSC subject goods, speeds up the entry filing process, and eliminates the need to provide a copy of the applicable certificate.

### 10. What information does a CPC or GCC contain?

A CPC contains 7 fields of information which is listed above under question 1. A sample of a CPC can be found here: [CPC Example – Toy | CPSC.gov](#). A GCC contains the same basic data fields as a CPC and additional information can be found here: [General Certificate of Conformity | CPSC.gov](#).

### 11. What if I can’t provide all of the information on my commercial invoice?

If your commercial invoice document template doesn’t have enough space to enter the required CPSC data, the shipper can provide an addendum to the commercial invoice with the applicable CPSC information or attach a copy of the CPC or GCC if not utilizing the Product Registry.

### 12. Can a customer submit the information for each shipment directly to CPSC at time of entry themselves?

No, while the importer is required to ensure that their products comply with the CPSC requirements including the eFiling data elements (starting on July 8, 2026), the actual transmission of the eFiling data must be completed at time of entry which is typically done by a Customs broker (such as DHL Express USA) unless the customer is self-filing their own entries.

### 13. Do these regulations apply at all shipment values? If so, do the applicable shipments require a separate entry?

Yes, the new eFiling requirements apply at all values for goods which fall under one of the HTS codes in scope of the CPSC regulations. Shipments subject to the eFiling requirements will need to be held for a separate entry if under \$2500 (no longer eligible for informal consolidated clearance) and additional fees may apply.

### 14. Where can I find additional information?

For additional information, please consult the website(s) below:

- [CPSC eFiling Program](#)
- <https://www.cpsc.gov/eFiling>
- [CPSC Product Registry](#)
- <https://www.cpsc.gov/eFiling-CPSC-Product-Registry>



- **CPSC Regulatory Robot**
- <https://business.cpsc.gov/robot/>
- **CPSC Flagged HTS Code List**
- <https://cpsc.gov/s3fs-public/CPSC-Guidance-and-HTS-List-for-Filing-of-Electronic-Certificates-6B-Cleared.pdf>
- **CPSC eFiling Guidance (FAQs & Program Info)**
- <https://www.cpsc.gov/eFiling>

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