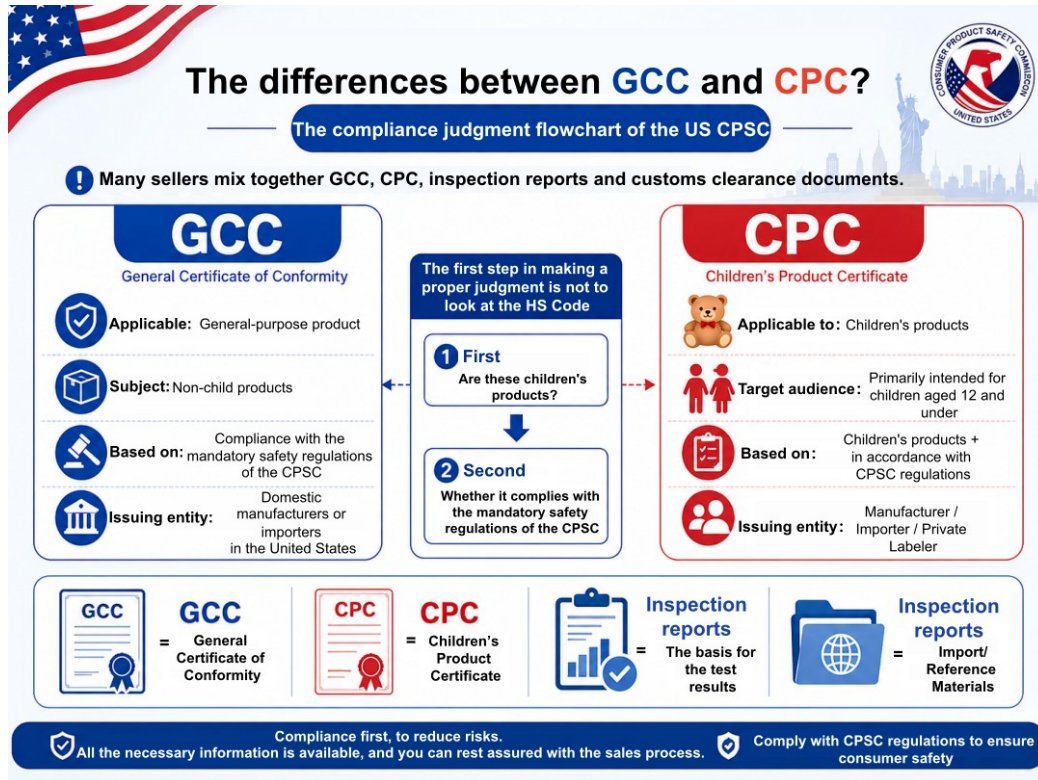


What Is the Difference Between GCC and CPC in CPSC eFiling?—A Plain-English Guide

GCC vs. CPC: A Complete Guide for Cross-border Sellers

Many cross-border sellers confuse GCC, CPC, test reports, and customs clearance documentation. When determining the applicable compliance pathway, the first step is not to check the HS Code. Instead, determine whether the product is classified as a children's product and whether it falls within the scope of mandatory CPSC consumer product safety regulations.



Suitable for: Amazon / TikTok Shop / Shopify / U.S. Customs Compliance

01 Conclusion First: GCC and CPC Are NOT the Same Thing

GCC, short for **General Certificate of Conformity**, is commonly translated as the General Certificate of Conformity. It is primarily applicable to **general-use products (non-children's products)**, provided that the product is subject to a mandatory consumer

product safety rule, ban, standard, or regulation enforced by the CPSC.

CPC, short for **Children's Product Certificate**, refers to the Children's Product Certificate.

It applies to products that are **primarily designed or intended for children 12 years of age or younger**, and that are subject to applicable CPSC children's product safety rules.

A test report serves as one of the supporting documents for the certificate, but it is not the certificate itself.

02 Comparison of the Key Differences

Item	GCC	CPC
Full Name	General Certificate of Conformity	Children' s Product Certificate
Applicable Products	General-use / Non-children' s products	Products primarily designed or intended for children 12 years of age or younger
Prerequisite	Product is subject to a mandatory CPSC rule, ban, standard, or regulation 规约束	Children' s product is subject to applicable children' s product safety regulations

Item	GCC	CPC
Testing Basis	Product testing for each product, or a reasonable testing program	Generally based on passing test results issued by a CPSC-accepted third-party laboratory
Laboratory Requirement	A CPSC-accepted third-party laboratory is generally not mandatory. First-party testing or testing performed by a qualified laboratory may be used to support the certificate.	Testing must generally be conducted by a **CPSC-accepted third-party laboratory**, except for certain small-batch manufacturers or other exemption scenarios that require separate evaluation.
Certificate Language	The GCC and all supporting information must be in English.	The CPC and all supporting test reports must be in English.
Typical Responsible Party	U.S. domestic manufacturer, or the importer of products manufactured overseas	U.S. domestic manufacturer, or the importer of children's products manufactured overseas
Purpose of the Certificate	Demonstrates that a general-use product complies with applicable CPSC requirements	Demonstrates that a children's product complies with applicable children's product safety regulations
Typical Customs Clearance Scenarios	Apparel, mattresses, bicycle helmets, button battery products, magnets, cigarette lighters, and other non-children's products covered by CPSC regulations	Toys, juvenile products, children's apparel, children's furniture, strollers, child restraint systems, battery-operated toys, and other children's products

03 How to Determine Which One Applies: Ask These Four Questions First

Question 1: **Is the product a consumer product?** If the product falls within the jurisdiction of the CPSC as a consumer product, the next step is to determine whether it is subject to any mandatory safety regulations.

Question 2: **Is the product primarily intended for use by children 12 years of age or younger?** The determination should be based on factors such as the product's design, packaging, advertising, age labeling, consumers' reasonable perception, and the CPSC Age Determination Guidelines.

Question 3: Is the product subject to any mandatory CPSC standards or bans?

Examples include:

* ASTM F963 for toys;

- * Small Parts requirements;
- * Total Lead Content limits;
- * Phthalates restrictions;
- * Button Cell or Coin Battery requirements;
- * Magnet safety requirements; and
- * Flammability requirements for textiles.

Question 4: **Which regulatory provisions must be cited on the certificate?** It is not sufficient for the certificate to simply state that the product is "Compliant with U.S. Standards." The certificate must specifically identify the applicable CPSC rules, regulations, or statutory citations that apply to the product.

Practical Compliance Assessment:

For the same product, changes to its appearance, packaging, marketing, or target age group may change its compliance pathway from GCC to CPC.

For example: A standard ballpoint pen is generally considered a general-use product. However, if the same pen is redesigned as a cartoon toy, packaged for children, or marketed specifically for children's use, it should be reassessed to determine whether it has become a children's product, thereby requiring compliance under the CPC pathway.

04 Common Product Categories Requiring a GCC

According to the official CPSC list, products requiring a General Certificate of Conformity (GCC) are general-use (non-children's) consumer products covered by specific mandatory CPSC rules.

The following categories are organized in a manner that is more practical for cross-border sellers.

Apparel / Home Textiles / Textile Products:

- * Adult apparel
- * Vinyl plastic film
- * Small and large carpets and rugs

- * Mattresses and mattress pads
- * Mattress sets

Cycling / Outdoor / Sports Equipment:

- * Bicycles
- * Bicycle helmets
- * All-Terrain Vehicles (ATVs)
- * Freestanding swimming pool slides

Home Furnishings / Furniture / Building Materials:

- * Bunk beds
- * Clothing storage units
- * Adult portable bed rails
- * Architectural glazing materials
- * Gypsum board
- * Cellulose insulation materials

Fire Safety / Flammability / Ignition Products:

- * Child-resistant cigarette lighters
- * Multipurpose lighters
- * Matches
- * Fireworks
- * Portable fuel containers
- * Special packaging subject to the **Poison Prevention Packaging Act (PPPA)**

Batteries / Magnets / Hazardous Small Products:

- * Products containing button cell or coin batteries
- * Magnets
- * Liquid nicotine packaging

Other Products Covered by CPSC Regulations:

- * Garage door openers
- * Walk-behind lawn mowers
- * CB antennas

- * Lead-containing paint and similar surface coatings
- * Swimming pool and spa safety products
- * Other products subject to applicable CPSC mandatory safety regulations



Important Note: A GCC is not required for every non-children's product.

Testing and issuance of a General Certificate of Conformity are generally

required only when the product is covered by an applicable mandatory CPSC rule or regulation.

05 Common Product Categories Requiring a CPC

The key criteria for a Children's Product Certificate (CPC) are:

Common product categories include:

Children's Toys:

- * Toys subject to ASTM F963
- * Battery-operated or electronic toys
- * Rattles
- * Marbles and jingle ball toys
- * Toy guns and imitation firearms
- * Products containing small parts

Infant and Toddler Care Products:

- * Baby changing tables
- * Cradles
- * Bedside sleepers

- * Infant sleep products
- * Infant bath seats
- * Infant bathtubs
- * Pacifiers

Juvenile Transportation and Seating Products:

- * Strollers
- * Children's pushchairs
- * Booster seats
- * High chairs
- * Hook-on chairs
- * Infant carriers
- * Baby carriers
- * Soft infant carriers

Children's Beds, Play Yards and Furniture:

- * Full-size cribs
- * Non-full-size cribs

- * Toddler beds
- * Children's bunk beds
- * Play yards
- * Safety gates and enclosures
- * Children's folding chairs and stools

Children's Apparel and Textile Products:

- * Children's sleepwear (Sizes 0–6X)
- * Children's sleepwear (Sizes 7–14)
- * Children's apparel
- * Carpets and rugs
- * Mattresses
- * Vinyl plastic film

Chemical and Mechanical Hazard Requirements:

- * Total lead content
- * Lead in surface coatings

- * Phthalates
- * Magnets
- * Button cell or coin batteries
- * Small parts

Children's Sports and Cycling Products:

- * Children's bicycles
- * Children's bicycle helmets
- * Children's All-Terrain Vehicles (ATVs)
- * Children's ride-on and riding toys

Other Durable Juvenile Products:

- * Infant bouncers
- * Infant swings
- * Baby walkers
- * Activity centers
- * Nursing pillows

- * Infant support cushions
- * Portable bed rails
- * Other durable infant and juvenile products



Which products are required to obtain the CPC?

• Compliance Judgment Chart for American Children's Products





The core judgment made by CPSC regarding children's products is: **Does the product have a design or is it primarily intended for use by children aged 12 and below?**
 When making a judgment, one should not merely rely on the title or HS Code. Instead, one should comprehensively consider factors such as packaging, promotion, size, patterns, age labels, usage, sales scenarios and consumer perception.

Clearly a product for children	Further investigation is needed	It doesn't necessarily have to be a product for children.
 children's toys  infantette  baby carriages  high chair  children's sleepwear  baby-feeding nipple  rattle toy  Children's bicycle helmets Usually, CPC is required.	 Cartoon stationery  Children's theme lighting fixtures  Children's room carpet  DIY Craft Kit  Electronic product casings featuring strong elements for children Based on the packaging / promotion / age indication assessment	 Common pens that adults also use  Ordinary electronic devices  Ordinary furniture  Ordinary decorations Not confirmed solely based on appearance

Key points for judgment

1 packaging

Packaging design, text, patterns, colors and information

2 publicity

Packaging design, text, patterns, colors and information

3 Size pattern

Product size, pattern style, playability and fun factor

4 Age indicator

Age recommendations or restrictions stated in the packaging or instructions

5 Sales scenarios and consumer perception

Sales channels, target audience, actual consumer perception

First, determine whether it is a product for children, and then confirm the applicable regulations and testing requirements.

Reminder for Sellers: A single children's product may trigger multiple testing requirements simultaneously.

For example, a toy may be subject to:

- * ASTM F963;
- * Small Parts requirements;
- * Total Lead Content limits;
- * Lead in Surface Coatings requirements;
- * Phthalates restrictions; and
- * Button Cell or Coin Battery safety requirements.

Therefore, compliance is not achieved simply by completing one so-called "CPC test." Every applicable regulatory requirement must be evaluated and tested accordingly.

06 What Information Should a CPC or GCC Certificate Contain?

The CPSC emphasizes that both GCC and CPC must contain complete and accurate certificate information.

A certificate generally includes the following seven core elements:

- 1) Product identification information covered by the certificate, including:

* Model number

* SKU

* Batch or Lot Number

* Product description

* Other identifying information

2) References to all applicable CPSC safety rules, regulations, or statutory requirements.

3) Information identifying the U.S. domestic manufacturer or the U.S. importer issuing the certificate.

4) Contact information for the individual responsible for maintaining the testing records.

5) Date and place of manufacture.

6) Date and place where testing was conducted.

7) Laboratory information.

For a CPC, testing is generally required to be performed by a CPSC-accepted third-party laboratory.

For a GCC, the laboratory information may be completed based on the actual testing source. Where no third-party laboratory has been used, "N/A" may be entered, as applicable.

07 In 2026, Importers Should Pay Particular Attention to CPSC eFiling

According to the CPSC's updates regarding certificate compliance and eFiling, imported consumer products subject to CPSC certification requirements will enter the phase of electronic certificate data submission.

According to publicly available information released by the CPSC: For general import transactions, the effective date is **July 8, 2026**.

For products entering U.S. commerce or warehouse withdrawal from a Foreign Trade Zone (FTZ), the effective date is **January 8, 2027**.

Practical Impact:

Previously, many sellers only submitted CPC or GCC certificates when requested during marketplace compliance reviews or random inspections conducted by the CPSC or U.S. Customs and Border Protection (CBP).

Following the implementation of eFiling, greater emphasis will be placed at the import stage on the completeness and accuracy of certificate data, including:

- * Product descriptions;
- * Testing dates;
- * Applicable regulatory citations;
- * Contact information for the custodian of testing records; and
- * Other required certificate data elements.

In other words, certificate compliance requirements will move further upstream in the import process.

08 Common Misconceptions That Many Sellers Encounter

Misconception 1:

"Having a test report means I already have a CPC or GCC." —

Incorrect.

A test report serves only as supporting evidence.

The certificate itself must generally be issued by the manufacturer or the importer.

Misconception 2:

"Every product imported into the United States requires a CPC."—

Incorrect.

A CPC applies specifically to the children's product compliance pathway.

For general-use (non-children's) products, the applicable requirement is generally a GCC or other relevant regulatory obligations.

Misconception 3:

"A GCC does not require testing." — Incorrect.

A GCC must also be supported by testing conducted on each product or under a **reasonable testing program.

The difference is that a GCC generally does not require testing by a CPSC-accepted third-party laboratory.

Misconception 4:

"CE, FCC, or RoHS certification can replace a CPC or GCC."—
Incorrect.

CE, FCC, and RoHS are separate regulatory compliance schemes. They do not replace a Children's Product Certificate (CPC) or a General Certificate of Conformity (GCC) required under applicable CPSC regulations.

Misconception 5:

"The HS Code alone is enough to determine compliance requirements."—Not sufficient.

Product compliance should be evaluated comprehensively by considering:

- * Intended use;
- * Target age group;

- * Materials;
- * Product construction;
- * Marketing and advertising claims; and
- * All applicable regulatory requirements.

09 Seller's Operational Checklist: Verify These Items Before Shipment

- 1) Confirm whether the product is primarily intended for children 12 years of age or younger.
- 2) Confirm whether the product is subject to any mandatory CPSC regulations.
- 3) List every applicable regulatory citation individually. Do not simply state "CPSC compliant."
- 4) For children's products, confirm that the testing laboratory is included within the scope of a CPSC-accepted laboratory, and that its accreditation scope covers the applicable testing requirements.
- 5) Ensure consistency across:

- * Certificates;
-

- * Test reports;
- * Product model numbers;
- * SKUs;
- * Batch/Lot numbers;
- * Manufacturing dates; and
- * Commercial Invoices, Packing Lists, and Bills of Lading.

6) For high-risk product categories—including products containing button cell or coin batteries, magnets, small parts, juvenile products, children's apparel, and toys—conduct regulatory screening before shipment.

7) Pay close attention to the CPSC eFiling certificate data requirements effective July 8, 2026, to avoid discrepancies between certificate information and customs declaration data during the import clearance process.

Final Recommendation:

For businesses entering the U.S. market, do not treat the CPC or GCC as documentation to be prepared at the last minute before shipment.

The recommended compliance workflow is as follows:

- * Conduct CPSC regulatory screening during the product selection stage.
- * Identify all required testing items during the product sampling and development stage.
- * Finalize product materials and structural specifications before mass production.
- * Complete a comprehensive consistency review of certificates and test reports prior to shipment.

Only by integrating compliance planning throughout the product lifecycle can sellers reduce customs clearance risks, improve import compliance, and facilitate smoother access to the U.S. market.