

U.S. Customs Clearance Reform Alert! Mandatory Enforcement in July, Affecting Over 600 HTS Codes!

The new regulation on electronic filing (eFiling) of imported consumer products jointly issued by the U.S. Consumer Product Safety Commission (CPSC) and U.S. Customs and Border Protection (CBP) is entering its countdown phase. **This policy will be officially and mandatorily enforced on July 8, 2026, covering more than 600 HTS tariff codes.**

It applies to a wide range of popular cross-border export categories, including apparel, toys, juvenile products, furniture, bicycles and helmets, button batteries, lighters, and more. The core of this new regulation is to fully move forward the compliance review process, replacing the previous model where compliance

certificates were provided along with the shipment or submitted only upon customs inspection.

The new regulation requires importers to **complete electronic filing** via CBP's ACE system prior to the cargo's arrival, submitting complete product compliance certificate data.

According to the policy requirements, **at least seven key data elements must be submitted when declaring regulated products**, including product ID (GTIN/UPC/SKU, etc.), applicable CPSC safety standard/regulation number, certification body information, contact details of the test records custodian, production date and place, testing date and place, as well as a compliance statement.

Meanwhile, if there are material differences that may affect product compliance, a separate electronic filing certificate must be **submitted for each product** to ensure accurate matching between the data and the cargo.

CPSC eFiling

This document provides specific details on what the requested Certificate of Compliance data are and how the data should be formatted.

Participants will file, at a minimum, the seven Certificate of Compliance data elements listed below for regulated finished products:

1. Product Identification¹;
2. List of Applicable Rules and/or Statutory or Regulatory Testing Exclusions;
3. Identification of Certifier;
4. Contact for Records and optional electronic access to records;²
5. Manufacture Date and Place;
6. Test Date and Place; and
7. Attestation.

Note: CPSC is requiring each certificate contain information for only one product. If a product is materially different, meaning that it has a different product design, manufacturing process (including location), or source of component parts (including paints and materials) from another similar product, then each product should have a separate eFiled certificate.³ In other words, if a certifier expects that the difference in a product can affect compliance, then each product should have a separate eFiled certificate.

Filing Methods

CPSC will use CBP's ACE system for filers (either an importer or broker) to allow trade to electronically file Certificate of Compliance data as a supplement to entry information being submitted to CBP. CPSC data will be submitted via the PGA Message Set—the standard process for all PGAs to receive their required data. Trade has the option to provide the following CPSC data:

1. Full PGA Message Set—filing all Certificate of Compliance data at time of entry, OR
2. Product Registry and Reference PGA Message Set—filing only a reference to Certificate of Compliance data at the time of entry that links to a prior entry of Certificate of Compliance data in the CPSC Product Registry.

Using either method, the data would be submitted via the PGA Message Set as part of an ACE entry, or an ACE entry summary certified for release. Participants who are filing entry of a product that requires Certificate of Compliance data will have the flexibility to select

It is worth noting that the scope of application of this new regulation is extensive with no exemptions. Not only must regular import shipments strictly comply, but products entering the United States from foreign trade zones will also be subject to the electronic filing requirement starting January 8, 2027.

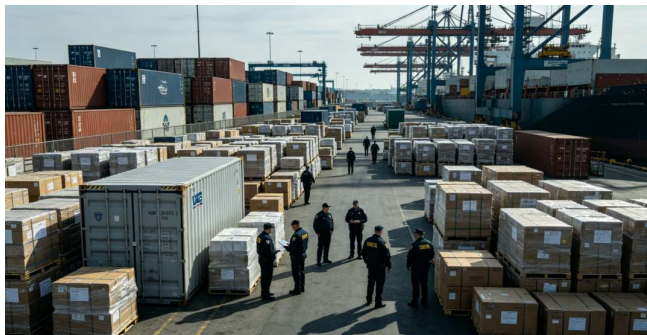
Even low-value shipments **below USD 800** must complete electronic filing; there is no minimum value exemption threshold.

Regarding the consequences of non-compliance, which are of greatest concern to enterprises, the CPSC clarified in its official FAQ that in the initial phase, CBP will not reject entry solely due to incomplete electronic filing data, **but will issue warnings instead.**

The risk scoring mechanism introduced by the new regulation will become a key influencing factor. The more complete the compliance documentation and the more standardized the declaration, the better the risk score, significantly reducing the probability of inspection and detention.

Conversely, missing information or non-compliant declarations will deteriorate the risk score, directly leading to customs clearance delays, increased likelihood of inspection, or even refusal of release by CBP.

If the product itself fails to meet CPSC safety standards, it will still be detained in accordance with the law.



With just **over two months remaining** before implementation, the preparation time for cross-border sellers, cargo owners, and freight forwarders is extremely limited.

It is recommended that relevant enterprises immediately verify whether their product HTS codes fall within the regulated list, and

promptly register and familiarize themselves with the CPSC product registration system and ACE filing procedures.

Coordinate in advance with logistics providers, customs brokers, and testing agencies to organize and 完善 core documents such as product test reports and compliance certificates, ensuring the accuracy of filing data.

This will help avoid risks such as cargo delays and increased costs due to insufficient preparation after the policy takes effect, and ensure a smooth transition to the new U.S. customs clearance compliance requirements.