

# Consumer Product Safety Commission (CPSC)

## Reference Message Set Data Sheet Instruction Guide

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## Does the CPSC Data Sheet Apply to My Products?

CPSC provides several resources to learn about Certificate of Compliance requirements:

- [Regulatory Robot](#)
- [Business Guidance Library](#)
- [List of Regulations, Mandatory Standards and Bans](#)
- [Contact CPSC's Small Business Ombudsman](#)

The importer of record (IOR) is responsible for filing all required Certificates of Compliance. Please review the above resources prior to selecting any disclaim option in the Product Information tables.

## What is the CPSC Product Registry?

The [CPSC Product Registry](#) is a free online library developed by CPSC that allows importers to store and manager their Certificates of Compliance. By storing Certificates within the Registry, you can then provide Mohawk Global with three product identifiers to file a short Reference Message Set with your entry.

Storing products within the Product Registry is the recommended method of managing your Certificates of Compliance. Benefits of the Product Registry include:

- Free tool for use by importers of all sizes to store and manage Certificates of Compliance
- Privacy features that allow Business Account Administrators to control access to data
- Ability to sort products into collections in a method that makes sense to them
- Bulk upload of data via API integration or .CSV upload
- Ability to manage trade data with third parties such as testing labs or manufacturers
- CPSC eFiling support for help and feedback

To learn more about the Product Registry, visit CPSC's [eFiling Document Library](#). The following resources are available:

- eFiling Product Registry Guide
- eFiling Quick Start Guide
- Product Registry Frequently Asked Questions (FAQ)
- eFiling API Specifications Document
- User Guide for CSV Upload
- .CSV Template for Bulk Upload

## What is the Purpose of the Data Sheet?

The data sheet is provided as a tool to allow you the dedicated space to report CPSC information for consumer products on your shipment when using the Product Registry. If your product requires a Certificate of Compliance, you must electronically file ("eFile") all Certificate information via a PGA message set filed with your entry. The recommended method is by uploading your Certificates of Compliance into the CPSC Product Registry so Mohawk Global can file a short Reference Message Set using three product identifiers sourced from your Registry:

- Certifier ID
- Product ID
- Version ID

After you have stored all regulated product Certificates of Compliance in your Product Registry and you have completed your commercial invoice, fill out this data sheet and attach it to your entry documents submitted to Mohawk Global. Attach continuation sheets if additional Product Information tables are needed.

This data sheet can also be used to report to Mohawk Global that a product is subject to a disclaim and a Certificate of Compliance is not required.

## Are There Alternatives to Using the CPSC Product Registry and the Reference Message Set?

If you choose not to use the Product Registry, Mohawk Global can file your full Certificate of Compliance on the entry using the longer Full Message Set. This method is not recommended for importers who import large volumes of consumer products or those who import the same product multiple times. Importers are encouraged to upload the Certificate to the Product Registry and file the Reference Message Set.

eFiling changed the Certificate of Compliance requirements and format so importers may find it difficult to adjust to the change if not using the Product Registry. An incomplete Certificate or one not aligned to the new requirements may delay the release of your shipment. If you choose not to utilize the Product Registry, please contact your Mohawk Global account representative for more information on the Full Message Set.

## Shipment and Importer Information

<b>1. Importer of Record Account Number</b>	Provide your Mohawk Global account number.
<b>2. Importer of Record Contact, Title</b>	Provide the name and title of the person completing this data sheet.
<b>3. Shipment Reference Number</b>	Provide a shipment reference number such as: <ul style="list-style-type: none"> <li>• PO Number</li> <li>• B/L Number</li> <li>• Master Bill</li> <li>• House Bill</li> <li>• PAPS</li> <li>• Other reference number</li> </ul>

## Product Information

Complete a Product Information box for each product on your shipment which requires CPSC filing. Attach continuation sheets if necessary.

<b>Product # ___ of ___</b>	Complete a Product Information box for each product on your shipment which requires CPSC filing. In the first blank space, indicate the product number beginning with #1 and increasing subsequently. In the second blank space, indicate the total number of products on the shipment which require a CPSC message set or disclaimer.
<b>1. Commercial Invoice Reference Number</b>	Provide the commercial invoice reference number of the invoice where this product is listed.
<b>2. Commercial Invoice Part Description</b>	Provide the product description of this product as shown on your commercial invoice.
<b>3. Regulated Product Information</b>	Select one of the following options. If the product is a regulated consumer product, provide the Certifier ID, Product ID, and Version ID.
<b>Product is Regulated by CPSC</b>	Select this option if the product is a regulated consumer product. Provide the following: <ul style="list-style-type: none"><li>• <b>Certifier ID:</b> The Certifier ID is a unique identifier created by the importer that is ultimately responsible for certifying the product certificates. CPSC advises that importers use a simple, alphanumeric, easily identifiable version of their company name that fits within the 23-character limit. Although spaces and special characters may be used, CPSC advises not to use them for ease of submitting the Certifier ID into the Reference Message Set.<ul style="list-style-type: none"><li>○ Example: An importer named ABC Co. imports regulated consumer products. When creating their Business Account in the Product Registry, they created Certifier ID: ABCCo.</li></ul></li><li>• <b>Product ID:</b> A unique identifier for the product that is being certified. This must be one of the following:<ul style="list-style-type: none"><li>○ SKU (Stock Keeping Unit)</li><li>○ UPC (Universal Product Code)</li><li>○ GTIN (GS1 Global Trade Item Number)</li><li>○ Model Number</li><li>○ Serial Number</li></ul></li></ul>

- Registered Number
- Alternate ID
- Example: Importer ABC Co. imports a product with the Product SKU of A1234567. Their Product ID is then created as Product ID: A1234567.

- **Version ID:** A unique identifier for the specific version of the product certificate in the Product Registry. This is unique to the Product ID identified above.

A new Version ID must be created in any of the following scenarios:

- An existing product certificate requires an update based on factors such as testing compliance renewal,
- A new batch of the same product (with the same Product ID) that has a [material change](#) when compared to the original product batch, such as
  - a change to the product design,
  - a change to the manufacturing process, or
  - a change to the source of the component parts for the product.
- A new batch of the same product (with the same Product ID) manufactured at different facilities and/or tested at different labs,
- Edits to a certified product certificate are required after the editing grace period has ended,
- A completed and certified product certificate requires edits but has already been used in a PGA Message Set within the editing grace period.
- Example: Importer ABC Co. entered their first product certificate for Product ID: A1234567 using Version ID: V1. They need to make an update to the certificate now that they have conducted annual retesting. In the Product Registry, they update the information using Version ID: V2

Since the Version ID changes frequently, it is the responsibility of the IOR to inform Mohawk Global when the Version ID is updated.

If the shipment contains products of the same Product ID but multiple Version IDs, complete multiple product blocks and separate products with different versions onto unique commercial invoice lines.

Verify with CPSC that your product is not regulated by the agency and requires a Certificate of Compliance. After verifying, select this option if:

- Product falls outside of CPSC jurisdiction and is not regulated by CPSC.
    - Example:
      - Non-consumer use industrial equipment
      - Medical devices regulated by FDA but not CPSC
  - Product falls within CPSC jurisdiction but no rule, ban, standard, or regulation requiring a certificate applies.
    - Example:
      - Collectible toys intended for adults
      - Sport helmets, other than bicycle helmets
      - Certain adult wearing apparel exempt from Flammable Fabrics Act Regulations per [16 CFR 1610.1\(c\)](#)
  - Product is a component part not for use by consumers.
    - Example:
      - Bicycle tires imported to a bike manufacture to produce a finished bicycle do not require a Certificate of Compliance and can be disclaimed because the imported tires are not used by a consumer.
      - Doll clothes imported to a toy store to be sold to consumers are considered finished products and may require a Certificate of Compliance. Not to be disclaimed.
- Do *not* disclaim components to be used by consumers.

### Disclaim A

Select Disclaim B if the product falls within CPSC jurisdiction but CPSC is exercising enforcement discretion and does not require a Certificate of Compliance.

- Certain adult wearing apparel exempt from GCC reporting per [16 CFR 1610.1\(d\)](#) and [81 FR 12587](#):
  - Plain surface fabrics, regardless of fiber content, weighing 2.6 ounces per square yard or more, and
  - All fabrics, both plain surface and raised-fiber surface textiles, regardless of weight, made entirely from any of the following fibers or entirely from combination of the following fibers: acrylic, modacrylic, nylon, olefin, polyester, wool.
- Household refrigerators displaying an appropriate safety mark indicating compliance with Underwriters Laboratories Standard 60335-2-24 (UL 60335-2-24).
- Personal use products exported for repair, and then reimported to the same consumer.
- Products sent as a gift from one consumer abroad to another consumer in the United States.

### Disclaim B