BCIA

# United States CPSC eFiling: Guidance for babywearing businesses

This document is not intended to replace the official instructions and information from the US CPSC.

It is neither a fully comprehensive setup guide nor legal advice.

It has been created for the convenience of BCIA members to help them navigate the complex eFiling process required by US law beginning July 8, 2026.

Last edited May 2026.

# Who is responsible for eFiling?

**The US importer of record (IOR) is responsible for eFiling.** An importer of record is any entity importing products for resale.

US consumers who are importing products clearly and exclusively for personal use (not for resale) do not need to complete the eFiling. **If a US consumer purchases a product in bulk to distribute to others at a** discount (for instance, a cooperative), **they may be considered a reseller** and may therefore have responsibilities as the "importer of record."

A manufacturer or brand that exists outside the US that is **selling products to US importers (who become the IOR)** cannot create an eFiling account. However, they may be added to existing eFiling accounts as authorized users so that they can directly upload test reports, manufacturer data, product information, and other details.

However**, if the manufacturer or brand that exists outside the US is *also* the "importer of record" responsible for tariffs, compliance, etc., they must create an eFiling account and upload all required information.**

**US importers of records must eFile data for any products that have any regulatory requirements in the US, even if the product has an exclusion for testing. This includes all children's products,** not just durable nursery products like baby carriers.

To complete the eFiling process, the importer of record must have all pertinent testing data. **For baby carriers, which are durable nursery products, in most instances this requires testing have been completed at a CPSC lab within a 12 month period prior to import, and that testing must be repeated every 12 months.**

If you are importing a sample for lab testing, the CPSC has outlined procedures for that.

# Determining the "Importer of Record"

The BCIA has received inquiries about who is responsible for eFiling. We have sent the US CPSC a list of scenarios and asked for clarity about eFiling responsibility, and their reply is only that it's the "importer of record" that is responsible. In some instances, it may be a bit complex for your business to determine who the IOR is.

EFiling by the importer of record is required regardless of how the freight is shipped, whether via postal service, air, sea, land, FedEx.

According to LegalClarity.org:

> "Federal law defines the importer of record as the owner or purchaser of the merchandise, or a licensed customs broker designated by the owner, purchaser, or consignee. In practice, this usually means the U.S. business that bought the goods from a foreign supplier. The statute requires that whoever files entry must do so using "reasonable care," which is the legal standard CBP applies when deciding whether an importer has met its obligations. A consignee who declares at the time of entry that they are the owner or purchaser of the goods can also serve as the importer of record . . . .  Customs brokers are the only parties authorized under U.S. tariff law to act as agents for importers in customs transactions, so you cannot designate a freight forwarder or other third party to serve as IOR in place of a licensed broker."

You can learn more about the importer of record number and the role of the IOR at their website.

**Only the importer of record can own an eFiling account to manage product imports.**

# Introduction

## What this guide is intended to do

**This guide was created to offer easy-to-follow information to help BCIA members enter their products and product details into the US CPSC eFiling system. It is not intended not replace the detailed information offered by the CPSC.**

After working through the process of uploading products with a member brand, the BCIA identified potential points of confusion or friction and streamline the information in a way that would help our members complete the process as seamlessly as possible.

This guide provides a starting point that we hope will serve most of the small to mid-size businesses who are BCIA members and make the eFiling process more accessible to members.

## Before you begin the eFiling process

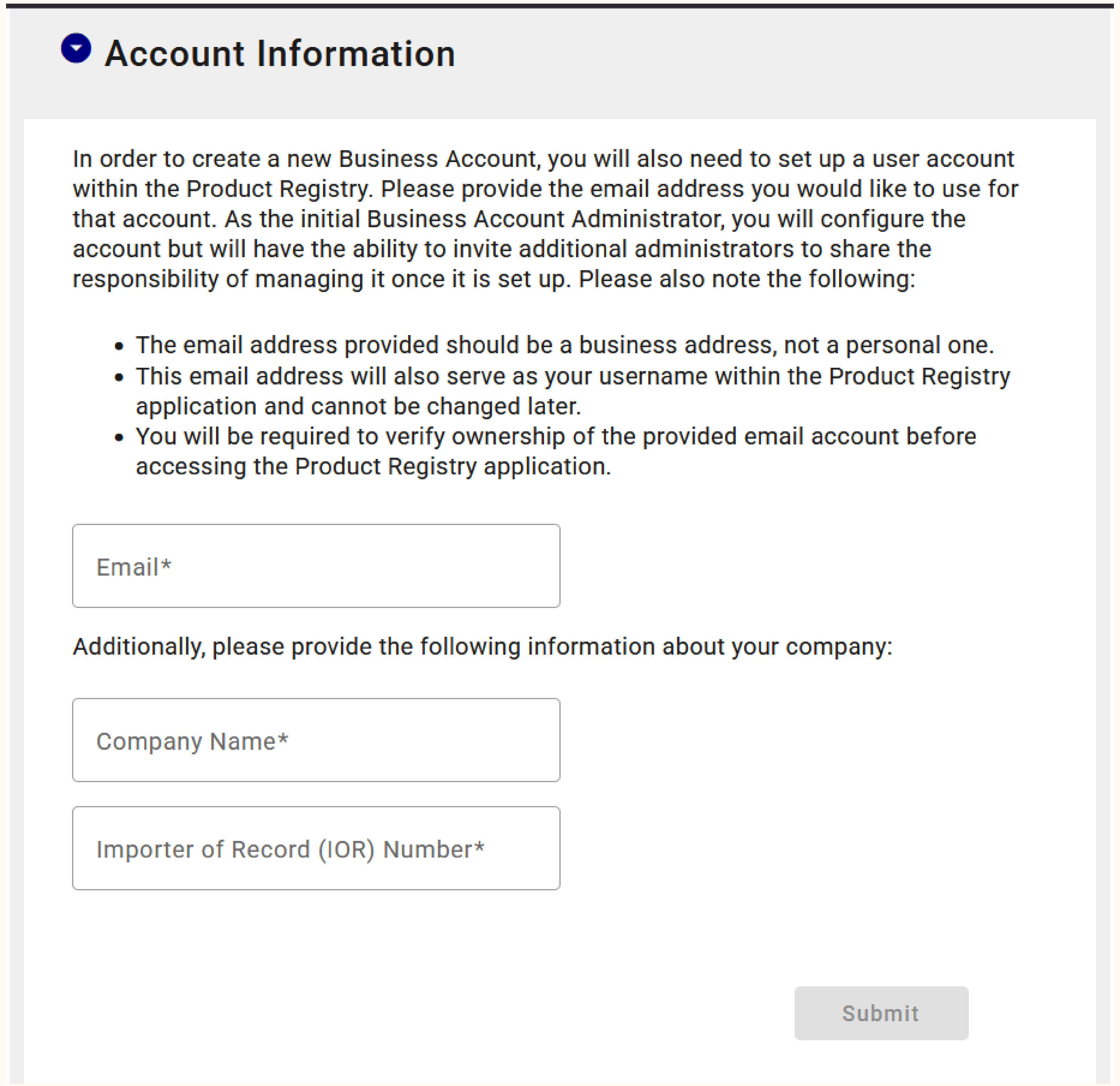
The US CPSC has provided extensive information and documentation about eFiling on its website. Before you begin the process, we recommend reviewing the information available there to familiarize yourself with the system and the process.

**The slide deck you are currently viewing was created in May, 2026**, and the CPSC has continued to refine their system and processes during their pilot program.

In particular, while working through the steps in this guide, it would probably be helpful to locate the eFiling product registry guide (.pdf) in the eFiling document library.


How to create your eFiling account

# Register for an eFiling account



**Account Information**

In order to create a new Business Account, you will also need to set up a user account within the Product Registry. Please provide the email address you would like to use for that account. As the initial Business Account Administrator, you will configure the account but will have the ability to invite additional administrators to share the responsibility of managing it once it is set up. Please also note the following:

- The email address provided should be a business address, not a personal one.
- This email address will also serve as your username within the Product Registry application and cannot be changed later.
- You will be required to verify ownership of the provided email account before accessing the Product Registry application.

Email*

Additionally, please provide the following information about your company:

Company Name*

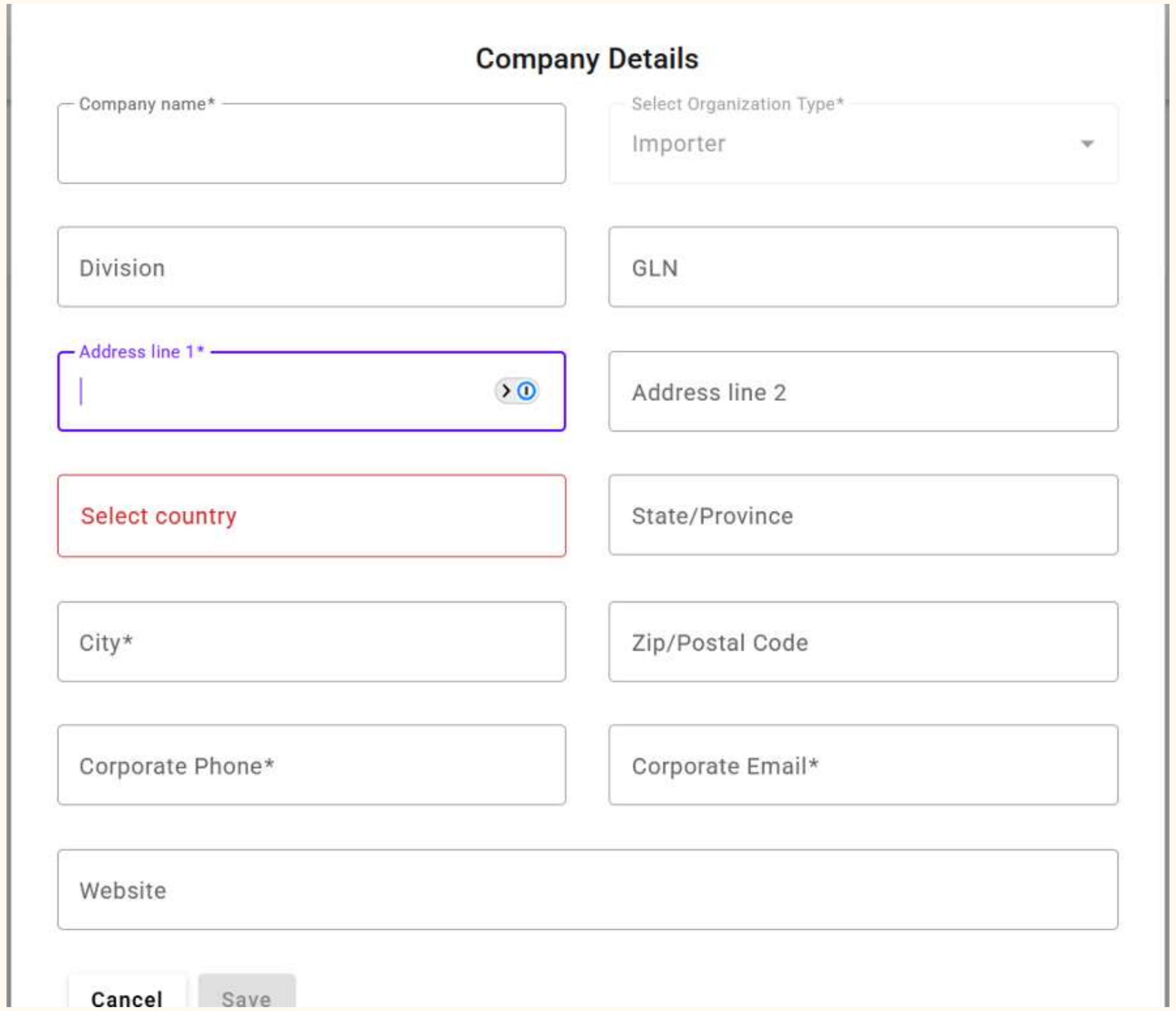
Importer of Record (IOR) Number*

Submit

*(Links current as of May 2026)*
**To register** for a new eFiling account, visit [https://www.cpsc.gov/eFiling-CPSC-Product-Registry](https://www.cpsc.gov/eFiling-CPSC-Product-Registry) .
To register, **you will need the following information**:

- Business name
- Business email
- Importer of record number.
  *(If you don't know your IOR number, it may be your EIN number; you can try that. The CPSC adds in their guide: "The IOR number may require a two-digit "division suffix" to pass the system validation. If the submission of your IOR number in the format XX-XXXXXXX failed, try resubmitting using the format XX-XXXXXXX00." If you cannot determine your IOR number, you may need to apply for one. If you contact the CPSC's support email while you wait for an IOR, they can help you set up your account before you receive it.)*
- Chosen username
- Chosen password
- You may choose a unique Certifier ID, or the system can assign one. This is the ID that will be used as a sort of "signature" when you certify your entries into the system.

# Add company information




Enter your company's information. Most BCIA members will not have a GLN (global location number) or company division. You can leave those fields blank if they don't apply to you. Fields with an asterisk * are required.

- Company Name*
- Organization Type (if you are creating a new eFiling account for a brand that is importing carriers, this field will default to "importer" and cannot be edited)
- Division
- GLN
- Address, City, State/Province, Country, Zip/Postal Code
- Corporate Phone*
- Corporate Email*
- Website

# Optional: Add users

This tutorial is designed for BCIA members managing very small businesses who intend to manage the eFiling process themselves and who might find the detailed CPSC user guides overwhelming or confusing. If you are working with a lab or other entity to enter your data, we recommend using the CPSC's guide directly.

If you are using this guide, we recommend waiting until later in the process to add any additional users.

The image below is taken directly from the CPSC User guide to give you an idea of what kinds of roles are available.

## 2.1 Business Account: User Roles and Responsibilities

Importers maintain all their certificate data and manage their users and third parties in a Business Account. Business Account functions include administrative, editing, and view only access to specific components of the account based on a user's role and the permissions that correspond to the role. For the purposes of this guide, a user is an individual in any role using the Product Registry. The Business Account User Roles table (see **Table 1)** lists specific user types and roles.

| Roles | Importer | Customs Broker | Manufacturer | Testing Lab |
|---|---|---|---|---|
| Business Account Administrator | X | | | |
| Collection Administrator | X | X | X | X |
| Collection Editor | X | X | X | X |
| Collection Viewer | X | X | X | X |

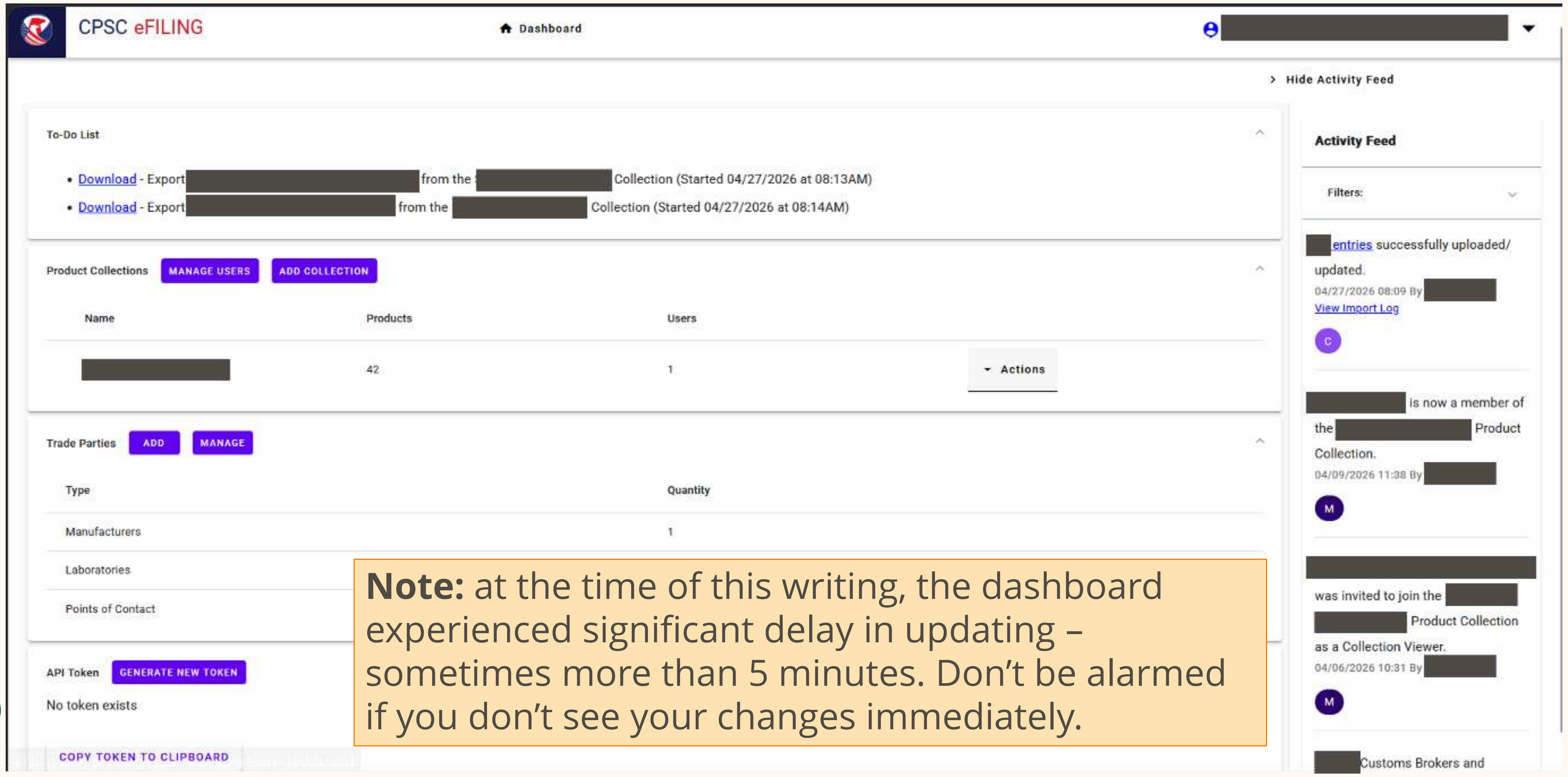
***Table 1. Product Registry User Roles***

# Add products, labs, manufacturers, and other details

# Log into your dashboard

At this point, you should receive an email confirming and verifying your account. After you receive the email, log into your account.

Your dashboard will be blank, but the layout will be similar to the image on the right. The layout may change as the program is implemented. The dashboard will include:




**Note:** at the time of this writing, the dashboard experienced significant delay in updating – sometimes more than 5 minutes. Don't be alarmed if you don't see your changes immediately.

- Activity feed – a list of actions you have taken and whether they are pending any additional follow-up
- To-do list – this particular company's to-do list shows their exports with instructions to complete the downloads
- Product collections – this is where your product uploads and children's product certificates are
- Trade partners – These are your test labs, product manufacturing facilities, and other similar points of contact
- API tokens – most BCIA users will not use this feature

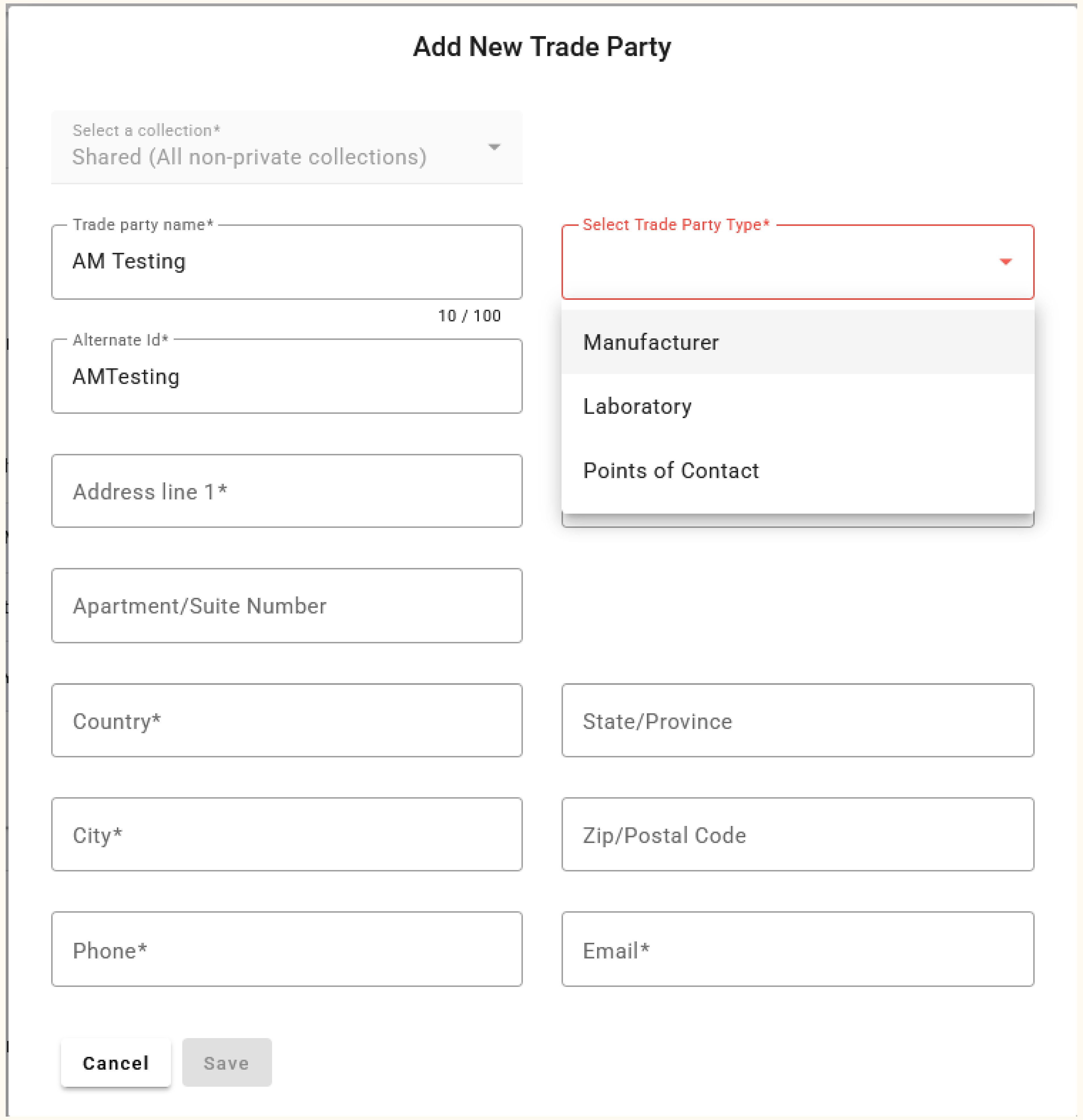
# Add trade parties

This is where you **enter information about your test labs and any third-party manufacturers** you work with.

Entering trade parties does NOT add them as users, even though you are entering their contact information. You will reference your trade partners when you are adding your products to the registry.

For most of BCIA's small, entrepreneurial members, adding "shared trade parties" should be appropriate. If you want more information on "shared" vs "private" trade parties, consult the CPSC guide.

- Trade party name (in this case, a lab)
- Alternate ID (you can assign whatever you want, including GLN if you have it)
- Address, City, State/Province, Country, Zip/Postal Code
- Phone
- Email
- Trade party type

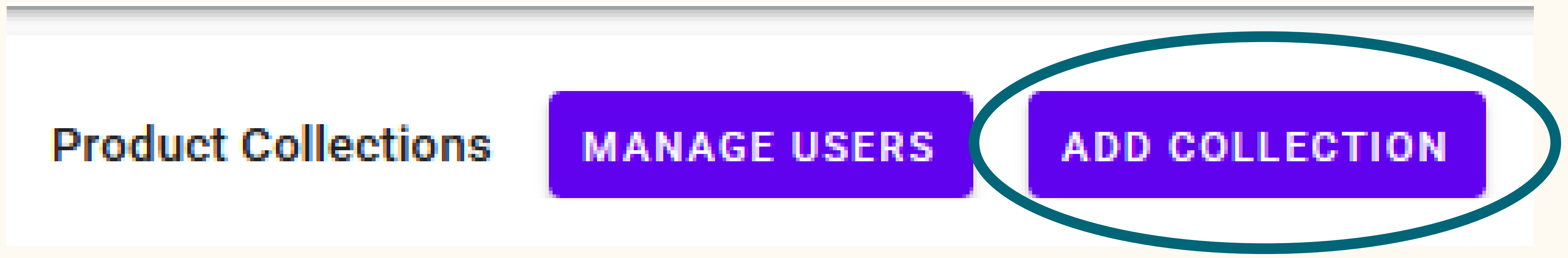


# Add products: Product collections

The eFiling dashboard groups your products into “collections.” You decide what constitutes a “collection.” For instance, you can have only one collection for all carriers, or you can have one collection for each carrier model (stretchy wrap, woven wrap, ring sling, half buckle, etc).

The CPSC user guide says, “Business Account Administrators can organize Product Collections to accommodate the specific needs of their business in managing access to product data, such as by product type or by Trade Partners that require access to the data. For example, if an importer works with more than one broker, the importer may wish to create separate Product Collections for each broker, so the brokers are unable to see the product certificate data managed by another broker.”

**Decide how you will group your products. Once you have uploaded products, you can archive them, but you may not be able to delete them.** Once you decided how to organize your product collections, click “add collection” next to the product collections heading.



# Add products to the collection

**After you add a collection, it will show up as a link in the “product collections” section of your dashboard.** Click that link to open the collection and begin adding products.

You can use a .csv spreadsheet to bulk upload your products, but it can be tricky to get the columns right. **The easiest way to add products as a beginner is to manually add the first product with all its details, then export that product listing.**

The reason we suggest this: downloading a fully entered product allows you to see how the different product elements that you enter are arranged in the spreadsheet, which helps you avoid formatting errors.

**To add your product, you’ll need:**

- All product information (name, model number, batch code/manufacture date, color, style, etc)
- Manufacturer information (in this instance, “manufacturer” means the contracted manufacturer who produces the product, for instance, a factory).
- Product testing information, including the lab, test date, and test report ID
- A list of citations/regulations to which you are certifying the product

# Add products: Which ones to add?

When you import your products, you likely have each color and size listed separately on your invoice or bill of lading. Customs and border patrol will match the entries in your eFiling registry to that list.

The CPSC's guidance is that each model number should be uploaded as a separate product, even when multiple products are linked to the same children's product certificate information. For instance, if you import linen wrap carriers in 3 colors and 3 sizes, you will need to upload 9 products. However, you will only need to upload one test report if all three carriers are made from the same type of linen and other components.

**From the CPSC:**

"If the products are identical in construction and materials and are covered by the same testing and the same certificate, they may all be included under a single certificate of compliance, even if they have different model numbers. Variations such as size or color do not require a separate certificate when the underlying construction, design, and testing are the same.

"Within the CPSC Product Registry, you may upload the certificate information once and list multiple model numbers associated with that certificate. The system allows importers to manage many related models within a single certificate record through product collections and bulk upload features."

# Add products: product details

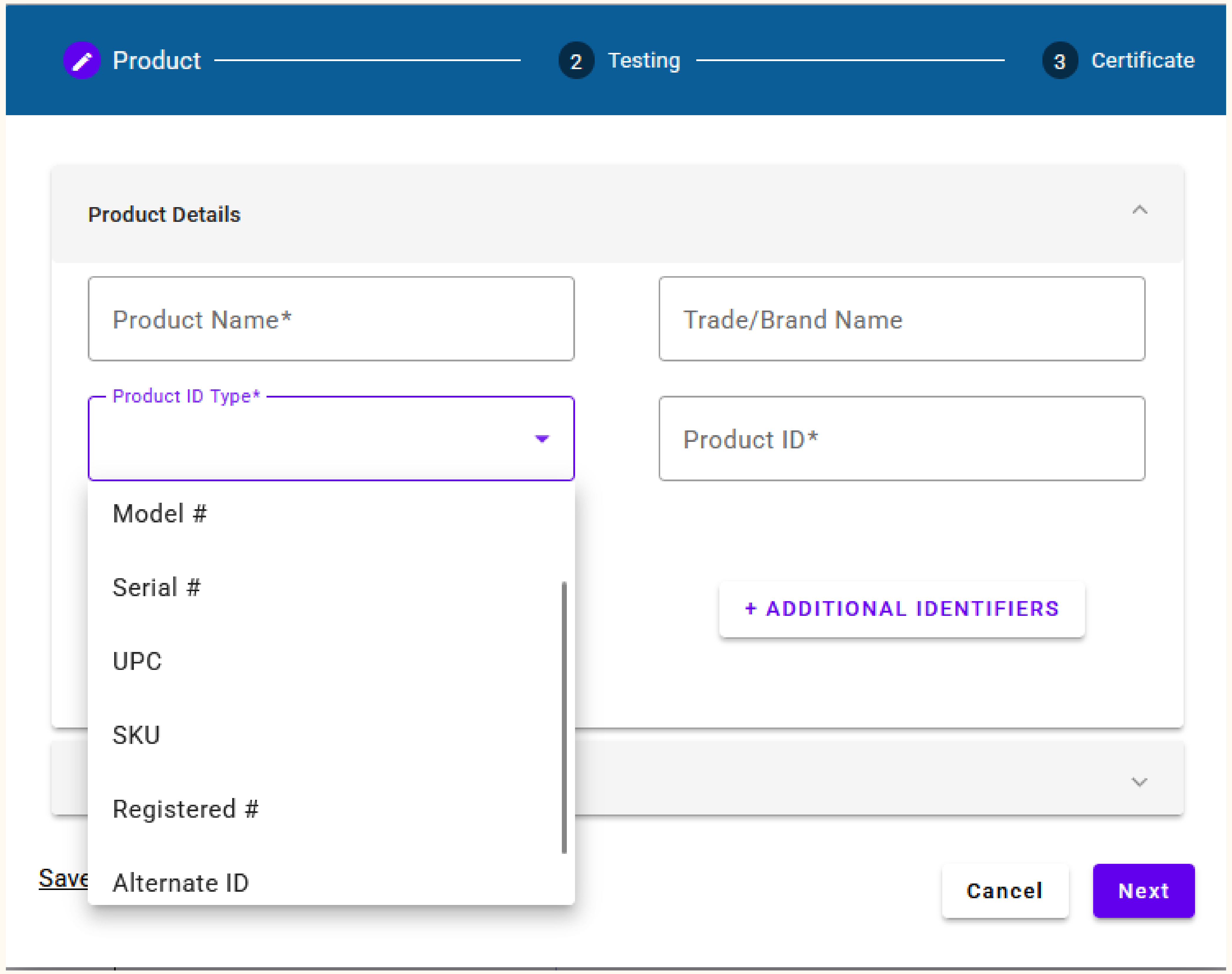
Enter the **product name** you use internally.

Next, you will enter your product ID. **The product ID must be fewer than 19 characters.**

You can choose one of several identifiers as your **product ID** -- GTIN, SKU, UPC, Model Number, Serial Number, Registered Number, or Alternate ID.

The identifier you enter here will be the **primary product ID** in the system. Later, you will have an opportunity to enter additional identifiers from the above categories.

Entering the trade or brand name is optional. If you own the company “Babywearing Is Great” and sell “Babywearing is Great” buckle carriers, ring slings, and babywearing jackets, you do not need to enter the “Babywearing is Great” brand here unless you choose to. If you import multiple brands (ie Lenny Lamb, Didymos, and Hackerlily), you might use this field to distinguish those brands in your product listings.



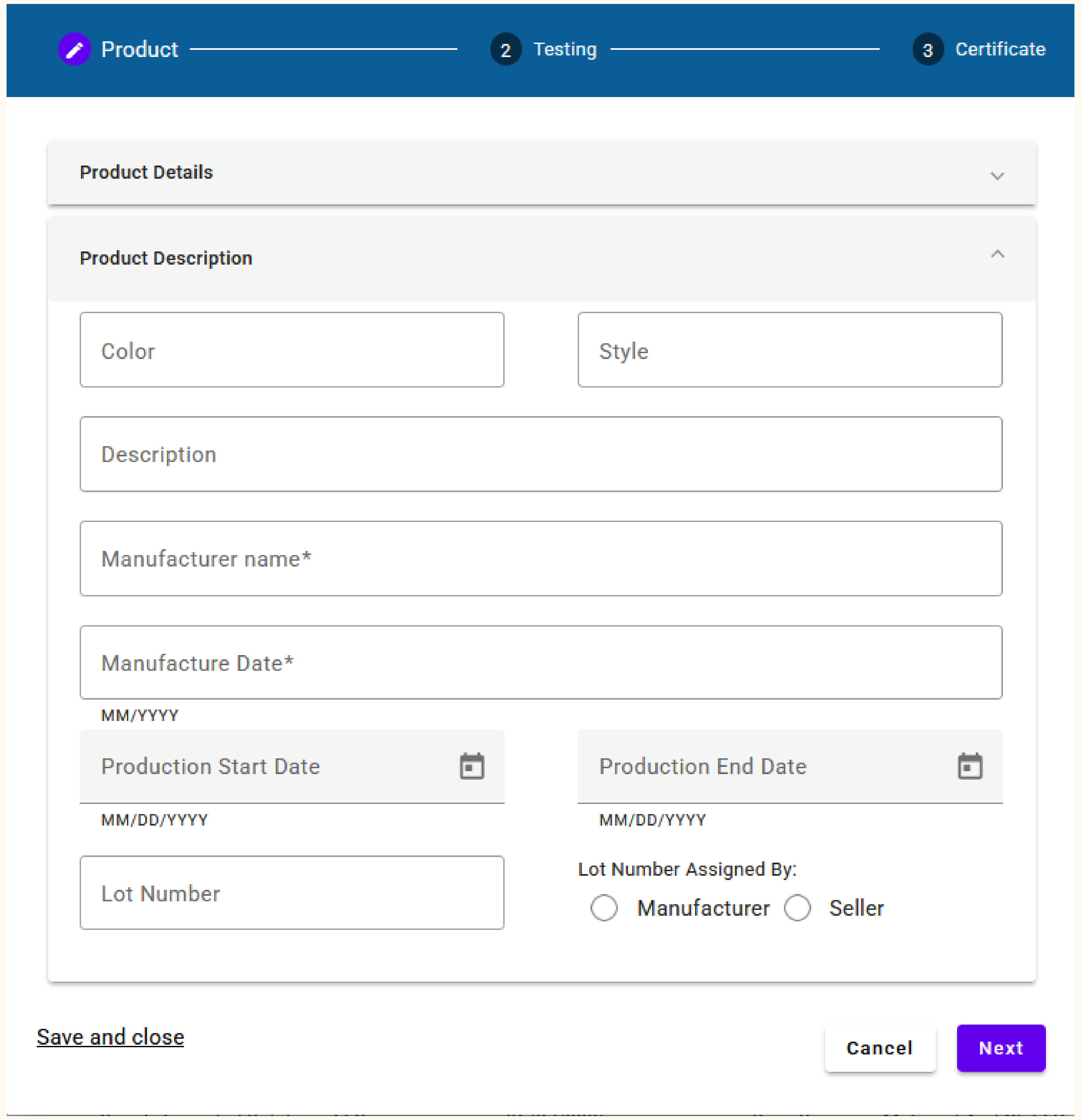
# Add products: Product description

**The most important part of this section is the manufacturer information.** You'll see that "manufacturer name" and "manufacture date" are marked with asterisks.

You can also enter color, style, description, lot number, and the start/end dates of production if you choose. **Most BCIA members will use a single date here.**

The "manufacturer name" is  the name of the trade partner you entered previously. The date of manufacture should be in MM/YYYY format.

If the product has a lot number (that is, a batch code that you put on the products rather than a date to delineate each production run), you should enter that here and denote whether that number is assigned by the product manufacturer (the person/company who actually cuts/sews the product) or by the "seller," which is you.



# Add products: Testing details (1)

**You need your product test certificate(s) for this section.**

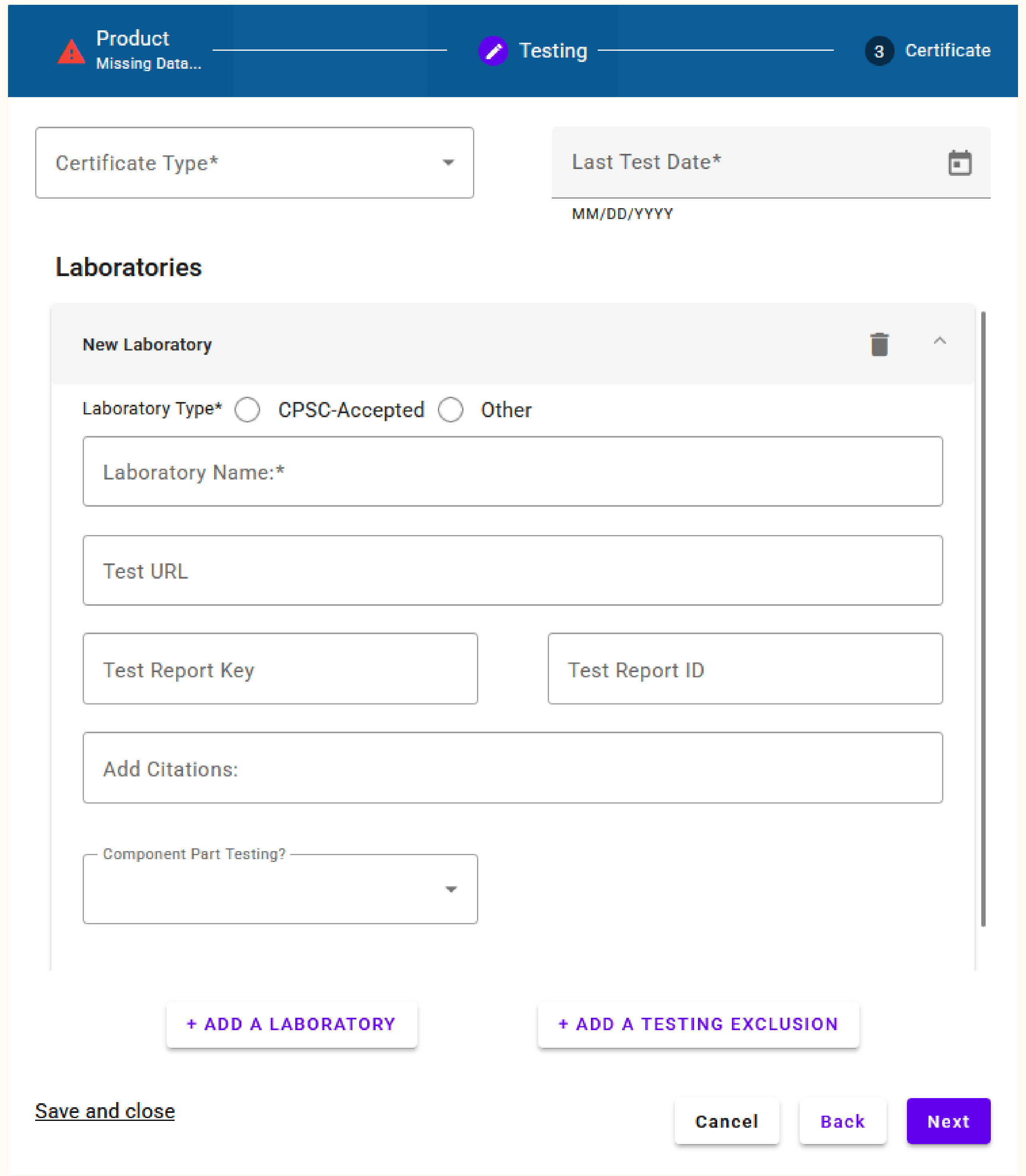
The “certificate type” for children’s products is “CPC.” Enter the last test date, which will be on your test report.

Enter your lab. Children’s products must be tested at a CPSC-accepted lab, so check that box. Under “laboratory name,” you can search the name or ID number of the lab you used. (If you use the BCIA testing discount at AM Testing, their ID is 1342.) If you have tests from more than one lab, you can enter additional labs at the end of this section.

Next, even though they are not marked with an asterisk, you should enter the test report ID and the citations. If the report is hosted online, you can enter the URL for the report.

If the test is for component parts only, such as a lead test or phthalates test on buckles, tick the appropriate box.

If you are claiming a testing exclusion (for instance, exclusion from flammability testing in a babywearing jacket due to fabric weight) you will need to enter that here.

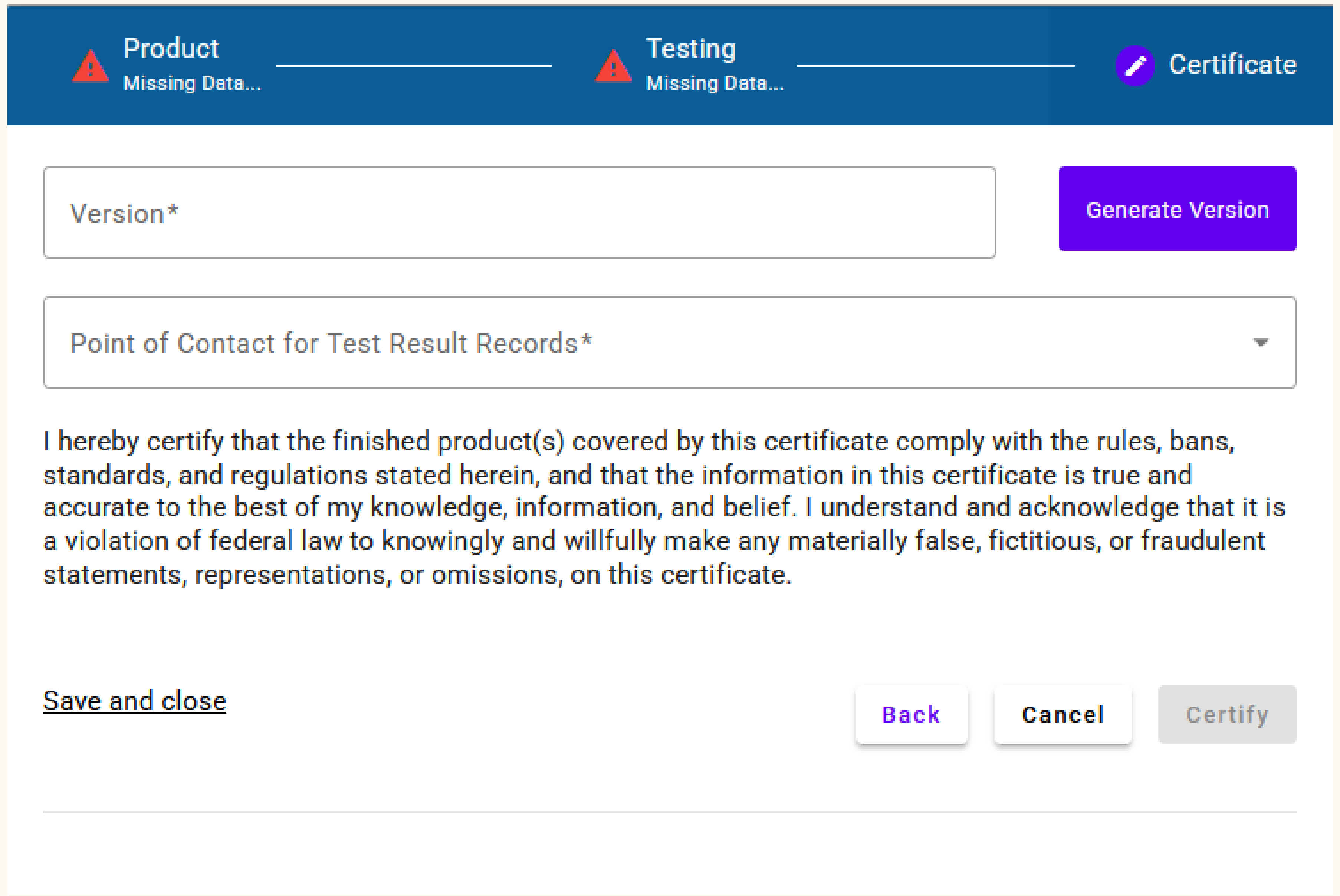



**Citation codes for soft carriers and slings:**

1226 (standard F2236 for soft carriers)
1228 (standard F2907 for sling carriers)
1501 (choking hazard)
1610 (flammability)
1278a (lead content)

# Add products: Testing details (2)

Finally, add product certificate details. **Each new batch you import requires an updated certificate with a unique version number.** The version numbers must increase numerically. The update to the certificate only changes the certificate to include your most recent batch of product, because you can't certify something that isn't yet produced; you don't need to re-enter the test details for updates.




You can choose your own version number or have the system generate a version number. One suggestion is to use the date of each update, so: 20260313 or 2026.03. This will be easy to recognize and remember.

Each new import can reference the same test and other items, **as long as the most recent test was completed fewer than 12 months prior to manufacture.**

Remember, although this process is tedious, you can use a spreadsheet to more quickly upload future updates and products.

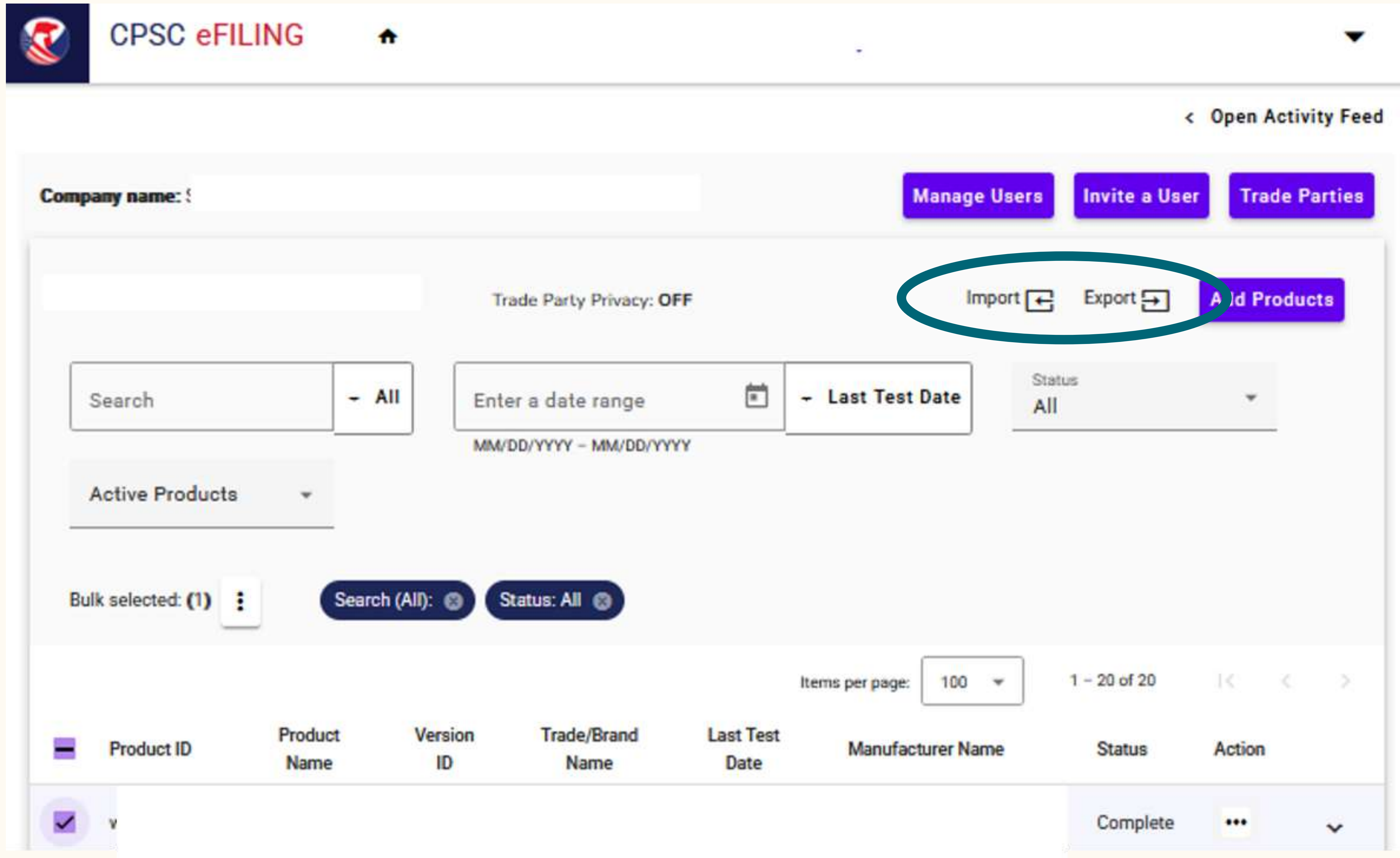
Finally, if you are ready to certify the data, enter the point of contact for test result records. If you wish to review them before certifying, you can enter now without certifying and certify later. Once a product is certified, it cannot be edited.

# Export your product in a spreadsheet

Now that you've entered all product details for a single product, you can export those details in a .csv format.

To download, open your product collection. Tick the checkbox next to the product you have uploaded, then click "export."

The resulting .csv will show you very clearly how to fill out the spreadsheet template for subsequent products, and you can also view our example spreadsheet to see how the many columns interact with one another.



# Complete and upload product spreadsheet

Using your exported .csv, add all of your products to the spreadsheet. Carefully check your work to ensure the accuracy of your data. If you are referencing the same version of your Children’s Product Certificate as the one you just uploaded, then you can enter that into your spreadsheet. If you are uploading a new version, follow our earlier instructions to update it.

You can view our example spreadsheet, which is color-coded to show you how each of the columns relates to your product data. When you have finished and feel confident about your data, save your file as a .csv and use the same screen to “import” the file, which will upload the products from your spreadsheet  to the product collection.

*This image shows a small portion of our example spreadsheet.*

The BCIA recommends that our members enter their first product using manual entry on the eFiling website, following the prompts given by the site. After your first product is added, you can download that file, and you will then be able to easily see where each piece of information should be entered on this spreadsheet. Some of the fields will be blank in your download, and that is ok.

| Version ID for your CPC | PRODUCT DETAILS -- When you download your first product, you should see ex | | | | | |
|---|---|---|---|---|---|---|
| Version ID | Primary Product ID | Primary Product ID Type | GTIN | UPC | SKU | Model Number |
| [see page 13 of the BCIA guide] | | | | | | |

# Optional: Add trade parties and invite users

There are many reasons you might want to add trade parties or invite users, and there are instances you might wish to do this sooner in the process. However, this tutorial is made for folks doing the process largely on their own.

**Trade parties** include customs brokers, labs, and product manufacturers. Those are informational entries only – trade parties cannot access your account and they don’t receive any notifications or messages related to your CPSC eFiling portal.

**Users** are people authorized to log into your portal to complete different tasks, such as uploading data.

If you would like to learn more, add additional trade parties, add users (such as a customs broker or manufacturer), you can consult the extensive documentation at the CPSC’s eFiling information hub.

# Good luck!

Note: The BCIA has found the eFiling support team to be highly responsive to emails and questions. Don't be afraid to reach out to them if you need more support.

If you have feedback about this guide, find an error, or notice there has been a change to the eFiling layout that makes this document inaccurate, please email us and let us know so we can fix it!

We recognize that this is a complex process and feels overwhelming for many of our members, and our goal is to make easier for you.