

CPSC · 16 CFR 1110.11(A)

Scope Determination and Certificate Build

Which CPSC rules apply to each SKU, CPC or GCC, what has to be tested by a CPSC-accepted laboratory, and the seven data elements every certificate must carry at entry.

PREPARED FOR	PREPARED	SKUS IN SCOPE	EFILING LIVE SINCE
Harborlight Goods LLC	2026-09-14	2	July 8, 2026

- 01 Determination memo — Fox Stacker Wooden Toy · CPC · HTS 9503
- 02 Children's Product Certificate build — Fox Stacker Wooden Toy, 4 rules cited separately
- 03 Determination memo — Waxed Canvas Tool Roll · GCC · HTS 4202
- 04 General Certificate of Conformity build — Waxed Canvas Tool Roll
- 05 Broker handoff — rules cited per SKU, one page for your customs broker at entry

SAMPLE · SYNTHETIC SUBJECT · NOT A DELIVERED FILE

Determination memo — Fox Stacker Wooden Toy

Prepared 2026-09-14 for Harborlight Goods LLC · listing: <https://harborlightgoods.example/products/fox-stacker>

Product: Wooden stacking toy for children ages 2 and up. Five painted hardwood rings on a beech post, water-based finish.

Age grade: children's product (intended primarily for ages 12 and under) **Certificate required:** CPC HTS: 9503.00.0073

Applicable rules

RULE	WHAT IT IS	THIRD-PARTY TESTING	NOTES
CPSIA Section 101 (15 U.S.C. 1278a)	Total lead content in children's products	YES — CPSC-accepted lab	100 ppm total lead limit in accessible substrate parts; cited on CPCs as 15 U.S.C. 1278a. Commission determinations (16 CFR 1252, 1253, 1500.91) relieve third-party testing for certain materials (e.g., untreated wood, certain textiles) — exempt from testing is NOT exempt from certifying.
16 CFR 1303	Ban of lead-containing paint and certain consumer products bearing lead-containing paint	YES — CPSC-accepted lab	90 ppm (0.009%) lead-in-paint limit. On CPSC's CPC list (children's painted products, third-party test per 1112.15(b)(10)) AND on the GCC list (paints and general-use furniture bearing paint certify via GCC).
16 CFR 1501	Small parts (choking hazard method for articles intended for children under 3)	YES — CPSC-accepted lab	Test-cylinder method implementing the ban at 16 CFR 1500.18(a)(9); third-party testing per 1112.15(b)(14). Cited on the CPC for any under-3 product.
16 CFR 1250	Safety standard for toys (ASTM F963-23)	YES — CPSC-accepted lab	Per CPSC, the CPC should cite the specific applicable ASTM F963 sections, not simply '16 CFR part 1250'; only the sections enumerated in 16 CFR 1112.15(b)(32) require third-party testing (labeling/instructional-literature requirements generally excluded).

Why these rules matched:

- **CPSIA Section 101 (15 U.S.C. 1278a)** — category "toys"
- **16 CFR 1303** — matches "toy", "children", "painted"; HTS 9503 ≈ 3208/3209/9503/9403
- **16 CFR 1501** — category "infant toys"; HTS 9503 ≈ 9503
- **16 CFR 1250** — children's toy → ASTM F963 toy standard applies to all toys

Same HTS family — screen, don't assume

RULE	WHAT IT IS	WHY SCREEN IT
16 CFR 1307	Prohibition of children's toys and child care articles containing specified phthalates	HTS 9503 ≈ 9503/3924 — same HTS family, not asserted applicable
16 CFR 1505	Electrically operated toys or other electrically operated children's articles	HTS 9503 ≈ 9503 — same HTS family, not asserted applicable
16 CFR 1510	Requirements for rattles	HTS 9503 ≈ 9503 — same HTS family, not asserted applicable

Testing

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Children's product: every rule above marked YES requires third-party testing by a CPSC-ACCEPTED laboratory before the CPC issues. Confirm the rule list with your lab — that confirmation is part of the process, not optional.

The seven data elements your certificate must contain (16 CFR 1110.11(a))

- 1. Identification of the finished product(s) covered, including at least one unique identifier (GTIN, model number, registered number, serial number, SKU, UPC, or alternate identifier) plus a description sufficient to match product to certificate (1110.11(a)(1)).
- 2. Each CPSC rule, ban, standard, or regulation to which the product is being certified, with all applicable rules identified separately (1110.11(a)(2)).
- 3. Identification of the finished product certifier (importer / manufacturer / private labeler): name, street address, city, state/province, country/administrative region, email, and telephone (1110.11(a)(3)).
- 4. Contact information for the individual (or always-staffed position) maintaining the records required by 16 CFR 1110.17: name, street address, city, state/province, country/region, email, telephone (1110.11(a)(4)).
- 5. Date (at minimum month and year; initial date for multi-day runs) and place of manufacture, production, or assembly, including manufacturer name, street address, city, state/province, country/region, email, and telephone (1110.11(a)(5)).
- 6. Most recent date and place(s) of compliance testing, including name and full contact information for each third party conformity assessment body or other party whose testing the certificate depends on; if a statutory/regulatory testing exclusion is claimed, the certificate identifies the exclusion in lieu of test date/place (1110.11(a)(6), 1110.11(c)).
- 7. The finished product certifier's attestation: 'I hereby certify that the finished product(s) covered by this certificate comply with the rules, bans, standards, and regulations stated herein, and that the information in this certificate is true and accurate to the best of my knowledge, information, and belief. I understand and acknowledge that it is a United States federal crime to knowingly and willfully make any materially false, fictitious, or fraudulent statement, representation, or omission on this certificate.' (1110.11(a)(7); for eFiled certificates the attestation is built into the Product Registry / PGA Message Set.)

eFiling

Since July 8, 2026 the certificate data elements must be eFiled with CBP at entry (CPSC Product Registry or broker upload). FTZ entries follow on January 8, 2027.

A determination aid prepared from CPSC and eCFR primary sources. The certifier (importer of record) remains legally responsible for identifying every applicable rule — a testing exemption is NOT an exemption from certifying. Not legal advice.

Prepared by CertScope · certscope.thecompound.tech · A determination aid — the certifier remains responsible for its certificates. Not legal advice.

CHILDREN'S PRODUCT CERTIFICATE (CPC)

Prepared 2026-09-14 · fill every [REQUIRED] field before filing — each maps to a mandatory element of 16 CFR 1110.11(a).

1. Product covered by this certificate

Fox Stacker Wooden Toy Identifier: HLG-FOX-001 Description: Wooden stacking toy for children ages 2 and up. Five painted hardwood rings on a beech post, water-based finish.

2. Rules, bans, standards and regulations certified to (each cited separately)

- CPSIA Section 101 (15 U.S.C. 1278a) — Total lead content in children's products
- 16 CFR 1303 — Ban of lead-containing paint and certain consumer products bearing lead-containing paint
- 16 CFR 1501 — Small parts (choking hazard method for articles intended for children under 3)
- 16 CFR 1250 — Safety standard for toys (ASTM F963-23)

3. Certifier

Harborlight Goods LLC 412 Kestrel St, Unit 3, Providence, RI 02903, USA compliance@harborlightgoods.example · (401) 555-0164

4. Records custodian

Compliance desk · compliance@harborlightgoods.example · (401) 555-0164 — maintains the test records supporting this certificate

5. Manufacture — date and place

Fengmiao Woodcraft Manufacturing Co., Ltd., Ningbo, China · 03/2026

6/7. Testing — date, place, and laboratory

[REQUIRED — CPSC-accepted laboratory name] · [REQUIRED — test date(s)] · [REQUIRED — test city/country]

Attestation: the finished product certifier certifies that this product complies with each rule, ban, standard, and regulation cited above.

Signature: _____ Title: _____ Date: _____

Template prepared by CertScope to the seven required data elements. The certifier remains responsible for the truth of every entry. Not legal advice.

Determination memo — Waxed Canvas Tool Roll

Prepared 2026-09-14 for Harborlight Goods LLC · listing: <https://harborlightgoods.example/products/tool-roll>

Product: Waxed cotton canvas tool roll with leather tie, eight pockets. Sold to trade and general consumers. **Age grade:** general-use product **Certificate required:** GCC HTS: 4202.92.9100

Applicable rules

RULE	WHAT IT IS	THIRD-PARTY TESTING	NOTES
16 CFR 1303	Ban of lead-containing paint and certain consumer products bearing lead-containing paint	YES — CPSC-accepted lab	90 ppm (0.009%) lead-in-paint limit. On CPSC's CPC list (children's painted products, third-party test per 112.15(b)(10)) AND on the GCC list (paints and general-use furniture bearing paint certify via GCC).
16 CFR 1610	Flammability of clothing textiles (general wearing apparel)	YES — CPSC-accepted lab	1610.1(d) exempts from TESTING plain-surface fabrics ≥ 2.6 oz/sq yd and fabrics wholly of acrylic, modacrylic, nylon, olefin, polyester, or wool — exempt from testing is NOT exempt from certifying: CPSC's own sample GCC cites the exemption on the certificate in lieu of test date/place (16 CFR 1110.11(c)). Children's apparel -> CPC with third-party testing (112.15(b)(20)); adult apparel -> GCC.
16 CFR 1263	Safety standard for button cell or coin batteries and consumer products containing them (Reese's Law)	no (first-party testing/records still required)	Performance (child-access) + warning-label requirements. Exemptions per 1263.1: toys for under 14 that comply with 16 CFR 1250 battery accessibility/labeling are EXEMPT from part 1263; zinc-air batteries excluded. CPSC's GCC list also cites 15 U.S.C. 2056e for battery packages.

Why these rules matched:

- 16 CFR 1303 — matches "general", "consumer"
- 16 CFR 1610 — matches "general"
- 16 CFR 1263 — matches "consumer"

Same HTS family — screen, don't assume

None.

Testing

General-use product: certify based on a test of each product or a reasonable testing program; keep the records behind the certificate.

The seven data elements your certificate must contain (16 CFR 1110.11(a))

1. Identification of the finished product(s) covered, including at least one unique identifier (GTIN, model number, registered number, serial number, SKU, UPC, or alternate identifier) plus a description sufficient to match product to certificate (1110.11(a)(1)).
2. Each CPSC rule, ban, standard, or regulation to which the product is being certified, with all applicable rules identified separately (1110.11(a)(2)).
3. Identification of the finished product certifier (importer / manufacturer / private labeler): name, street address, city, state/province, country/administrative region, email, and telephone (1110.11(a)(3)).

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- 4. Contact information for the individual (or always-staffed position) maintaining the records required by 16 CFR 1110.17: name, street address, city, state/province, country/region, email, telephone (1110.11(a)(4)).
- 5. Date (at minimum month and year; initial date for multi-day runs) and place of manufacture, production, or assembly, including manufacturer name, street address, city, state/province, country/region, email, and telephone (1110.11(a)(5)).
- 6. Most recent date and place(s) of compliance testing, including name and full contact information for each third party conformity assessment body or other party whose testing the certificate depends on; if a statutory/regulatory testing exclusion is claimed, the certificate identifies the exclusion in lieu of test date/place (1110.11(a)(6), 1110.11(c)).
- 7. The finished product certifier's attestation: 'I hereby certify that the finished product(s) covered by this certificate comply with the rules, bans, standards, and regulations stated herein, and that the information in this certificate is true and accurate to the best of my knowledge, information, and belief. I understand and acknowledge that it is a United States federal crime to knowingly and willfully make any materially false, fictitious, or fraudulent statement, representation, or omission on this certificate.' (1110.11(a)(7); for eFiled certificates the attestation is built into the Product Registry / PGA Message Set.)

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GENERAL CERTIFICATE OF CONFORMITY (GCC)

Prepared 2026-09-14 · fill every [REQUIRED] field before filing — each maps to a mandatory element of 16 CFR 1110.11(a).

1. Product covered by this certificate

Waxed Canvas Tool Roll Identifier: HLG-ROLL-014 Description: Waxed cotton canvas tool roll with leather tie, eight pockets. Sold to trade and general consumers.

2. Rules, bans, standards and regulations certified to (each cited separately)

- 16 CFR 1303 — Ban of lead-containing paint and certain consumer products bearing lead-containing paint
- 16 CFR 1610 — Flammability of clothing textiles (general wearing apparel)
- 16 CFR 1263 — Safety standard for button cell or coin batteries and consumer products containing them (Reese's Law)

3. Certifier

Harborlight Goods LLC 412 Kestrel St, Unit 3, Providence, RI 02903, USA compliance@harborlightgoods.example · (401) 555-0164

4. Records custodian

Compliance desk · compliance@harborlightgoods.example · (401) 555-0164 — maintains the test records supporting this certificate

5. Manufacture — date and place

Fengmiao Woodcraft Manufacturing Co., Ltd., Ningbo, China · 02/2026

6/7. Testing — date, place, and laboratory

2026-02-19 · Providence, RI, USA

Attestation: the finished product certifier certifies that this product complies with each rule, ban, standard, and regulation cited above.

Signature: _____ Title: _____ Date: _____

Template prepared by CertScope to the seven required data elements. The certifier remains responsible for the truth of every entry. Not legal advice.

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Broker handoff — Harborlight Goods LLC

Prepared 2026-09-14 · give this page to your customs broker with the certificates attached.

SKU	CERT	RULES CITED	HTS
Fox Stacker Wooden Toy	CPC	CPSIA Section 101 (15 U.S.C. 1278a); 16 CFR 1303; 16 CFR 1501; 16 CFR 1250	9503.00.0073
Waxed Canvas Tool Roll	GCC	16 CFR 1303; 16 CFR 1610; 16 CFR 1263	4202.92.9100

Notes for the broker:

- Certificate data elements are eFiled at entry per the CPSC eFiling rule (effective July 8, 2026; FTZ entries January 8, 2027). Full certificates and test records stay with the certifier's records custodian, identified on each certificate.
- Rules are cited individually on each certificate per 16 CFR 1110.11(a)(2).
- Questions about any determination: certscope@thecompound.tech — we answer brokers directly.

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About this pack

Every rule in this pack was matched against a curated dataset of CPSC rules built from CPSC and eCFR primary sources, and every citation is given so it can be checked against the source rather than taken on trust. Rules the description did not carry are listed separately to be screened, not asserted. A testing exemption — including a Commission determination under 16 CFR 1252, 1253 or 1500.91 — is **not** an exemption from certifying.

ENGAGEMENT

eng_sample · batch10

PREPARED

2026-09-14

CERTIFIER

Harborlight Goods LLC

BROKER QUESTIONS

certscope@thecompound.tech

A determination aid — the certifier remains responsible for its certificates. Not legal advice.

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