

# CPSC eFiling at AFG Media

## The Complete Process Guide

*How AFG files US product safety certificates, how the Compliance Hub tracks them,  
and how to keep everything running*

Version 1.0 · 22 July 2026 · Owner: Owen Milloy (technical) / Katie Greenwood (compliance)

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## 1. Why this exists

Since 2026, the US Consumer Product Safety Commission (CPSC) requires importers to **eFile product safety certificates** for regulated consumer products at the point of import into the USA. For AFG that means every costume, accessory and novelty item we ship from China into US fulfilment centres needs a certificate lodged in CPSC's eFiling Product Registry ([saferproducts.gov](https://saferproducts.gov)) before the stock lands.

There are two certificate types:

- **CPC (Children's Product Certificate)** — for products designed or intended primarily for children aged 12 or under. Requires third-party laboratory testing (SGS, CTT, SFT etc.) with specific safety citations, e.g. ASTM F963 toy safety clauses, lead content (15 USC 1278a), phthalates (16 CFR 1307).
- **GCC (General Certificate of Conformity)** — for adult products. Most AFG adult costumes qualify for the textile flammability **exemption 16 CFR 1610.1(d)(2)**, meaning no lab testing is required — we file the certificate with the exemption code and a “No Lab Testing Required” placeholder lab.

**The one exception to the adult rule: batteries.** Any product containing button/coin cell batteries needs proper battery safety documentation (16 CFR 1263 / UL 4200A) even if it is an adult product.

Filing one certificate at a time in the CPSC website is impractical at AFG's scale (thousands of SKUs), so we built an automated pipeline plus a tracking dashboard. This document explains all of it.

## 2. The system at a glance

| Component            | What it does                                                                                                                                                                                                                            |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Katie's Dropbox drop | Katie (compliance) saves supplier certificates into the shared Dropbox folder E-FILLING. This is the input to everything.                                                                                                               |
| Processing pipeline  | A set of scripts that read every certificate document, extract the data (SKUs, citations, labs, dates, manufacturers), match SKUs to the PIM, classify each SKU (kids CPC / adult GCC / battery review), and produce a review workbook. |
| Review + sign-off    | Owen (and Katie where needed) review the plan workbook, answer any open questions (e.g. missing factory addresses, age conflicts), then approve.                                                                                        |
| Bulk upload          | Approved rows are submitted to CPSC's eFiling API in bulk ( <code>doCertify=true</code> , so certificates go straight to Complete). Results are verified against a fresh export.                                                        |
| AFG Compliance Hub   | The dashboard at <a href="https://efiling.afgmedia.co.uk">efiling.afgmedia.co.uk</a> . Shows every SKU's certification status, whole-catalogue progress, and the 2026 Shipments tracker with downloadable reports.                      |

**The flow in one line:** supplier certificates → Dropbox → extraction & classification → review workbook → bulk upload to CPSC → Compliance Hub shows live status.

### 3. Key places

| Thing                      | Where                                                                                                                                                                                               |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Compliance Hub (dashboard) | <a href="https://efiling.afgmedia.co.uk">https://efiling.afgmedia.co.uk</a> — SKUs / Progress / 2026 Shipments                                                                                      |
| CPSC eFiling website       | <a href="https://efiling.saferproducts.gov">https://efiling.saferproducts.gov</a> — admin dashboard; log in as <a href="mailto:compliance@morphsuits.co.uk">compliance@morphsuits.co.uk</a> (Katie) |
| Certificate drop folder    | Dropbox: Owen Milloy / E-FILLING (subfolders: CPCs, Test Certs/Kids, Test Certs/Nicky Bigs)                                                                                                         |
| Processing scripts         | Seller Session Workshop / AFGWork / cpsc-efiling (extraction, matching, classification, bulk upload)                                                                                                |
| Hub source code            | GitHub MorpheusMorphsuits/afg-compliance-hub (private); deployed on the AFG VPS, container compliance-hub, port 3031                                                                                |
| Credentials                | Infisical vault (CPSC_EFILING_* and AKENEO_* keys). Never hardcoded. API token expires 4 Aug 2026 — renew in the eFiling admin dashboard.                                                           |

## 4. The Compliance Hub — page by page

### 4.1 SKUs (home page)

The lookup page. Search any SKU to see where it stands; filter by brand, age group or status. Click a SKU for its full detail — PIM data, planned certificate data, and its live eFiling record side by side. The sync buttons here refresh the Hub's data from PIM, from eFiling, and from the shipment lists. Use this page to answer “is X certified?”

### 4.2 Progress

The whole-catalogue view (roughly 10,400 SKUs), split by brand and kids/adult. **Important: this includes discontinued lines and products that never ship to the US**, so the percentages look low by design. Use it for long-term coverage trends only — the page carries a banner saying exactly this.

### 4.3 2026 Shipments — the page that matters day to day

Tracks only the SKUs actually shipping from China to the US this year (Eli's ship lists) and checks each one against live eFiling, with progress bars overall and per shipment list. Every shipping child SKU gets one of five statuses:

| Status        | Meaning                                                     | Colour |
|---------------|-------------------------------------------------------------|--------|
| Submitted     | Certificate is Complete in eFiling. Done.                   | Green  |
| Awaiting cert | In eFiling but not yet Complete — certify in the dashboard. | Amber  |

|                      |                                                                                                                                            |            |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------|------------|
| Covered by parent    | A sibling size of the same parent already has a live certificate, so the certificate exists and applies — this child just needs importing. | Light blue |
| Planned (docs ready) | Certificate documents received and staged in a batch plan — waiting on import / sign-off. No new documents needed.                         | Blue       |
| Outstanding          | Nothing on file. A certificate must be sourced from the supplier before anything else can happen.                                          | Grey       |

**Why parent level matters:** one CPC covers all sizes of a product, but eFiling requires a record per child SKU. So a certificate obtained for parent MCKPKD covers MCKPKDS/M/L — the Hub rolls status up to parent groups (“parents done 602/632”) while still tracking each child individually.

#### 4.4 The two downloads

- **Download list (.xlsx)** — exports exactly what you have filtered on screen. Filter to one list + Outstanding and you have a work-list.
- **Download FULL report (.xlsx)** — the one-click explainer for anyone, no Hub access needed. Tabs: **READ ME** (definitions + summary), **1-MISSING** (no docs — chase suppliers), **2-READY NOT SUBMITTED** (we hold the data — includes test report ID, lab, dates, why it's ready and the next step), **3-PENDING IN EFILING**, and **ALL SKUS** (the colour-coded master list).

#### 4.5 Keeping the Hub current

- **New certificates arrive:** process the batch (section 5), then press Sync eFiling on the SKUs page.
- **New ship list from Eli:** drop the xlsx into the app's data/shipments/ folder (each tab becomes a tracked list) and press the shipments sync.
- **New products added to PIM:** press Sync PIM so parent/child mappings stay accurate.

### 5. The certificate processing pipeline

This is what happens when Katie adds new certificate documents to the Dropbox E-FILLING folder. Owen runs it with Claude; the scripts live in AFGWork/cpsc-efiling and each batch gets dated copies, so any run can be reproduced.

#### 5.1 What Katie drops in

- **CPC documents** (Word .docx) — Children's Product Certificates prepared from SGS test results, containing the citation table, product name and last test date. Newer ones also carry the manufacturer's name and address.
- **Full test reports** (PDF, e.g. SZHL numbers = SGS Shenzhen) — carry manufacturer name, country of origin, PO reference, testing dates and age grading. One report often covers many SKUs (Katie saves one copy per SKU).

- **Prop 65 reports** (PDF) — California Proposition 65 tests. On their own these support the adult/GCC route only. *Warning: file names saying “Prop 65” are unreliable — several contain full toy-safety test batteries, so the pipeline always reads the contents.*
- **Umbrella certificates** — one supplier report listing an entire range (e.g. the Jim's Helmets & Swords SFT report covering ~200 models). The pipeline expands these against the PIM.

## 5.2 The five steps

1. **Identify what's new.** Compare the Dropbox folder against previous runs (file dates) and against a live export of the eFiling collection, so nothing is processed twice.
2. **Extract.** Every document is parsed: report numbers, SKU lists, citation codes, N/A citations, test dates, manufacturer, country of origin, age grading, battery mentions.
3. **Match to PIM.** Documents are grouped by test report, and every SKU token is resolved to real PIM products — handling bare numbers (70182 → NB70182), suffix forms (70671NB → NB70671), bundles (BUN-), multipacks (MP-...PK2) and parent-to-children expansion. Tokens that don't match PIM are listed for review, never silently dropped.
4. **Classify.** Each SKU is routed: **Kids** → **CPC** (citations from the CPC doc; known-rejected codes stripped; sensible defaults if a CPC lists none), **Adult** → **GCC** with the 1610.1(d)(2) exemption, **Adult with batteries** → **review** (needs battery documentation), and genuine kids/adult contradictions are flagged for Katie to arbitrate. Evidence used: whether a CPC exists, SKU prefix (MCK = Morph kids), PIM age attributes, Amazon listing age/department data, and the test report's age grading. A full toy test on an otherwise-adult product does not make it a children's product — it stays GCC.
5. **Review** → **upload** → **verify.** Everything lands in a colour-coded review workbook (one row per SKU, plus a questions list). After sign-off, rows are submitted to the eFiling API in chunks with doCertify=true, trade parties (manufacturers/labs) created on first use, the import log checked per chunk, and a fresh export pulled to confirm what is live. Then the Hub is re-synced.

## 5.3 Standing data rules

- Certificates are filed per **child SKU**; versionId = SKU + “V001” so re-certifications become V002 and stay searchable.
- Product identity comes from PIM: name, brand (AFG\_Brand), barcode (UPC/GTIN by type), colour, size, country of origin.
- Manufacturer addresses come from the certificate documents, the Factory Address Map, and the manufacturers already registered in eFiling. New factories are flagged as questions before upload.
- Dates: manufacture month is taken from the certificate (or derived from the report date), production end = 1st of that month, production start = 12 weeks earlier, and lastTestDate is mandatory.

## 6. What has been filed so far

| When | What |
|------|------|
|------|------|

|              |                                                                                                                                                                                                                             |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| May 2026     | API integration built and proven; pilot certificate (KMCPIALNEW) validated end to end in the sandbox collection; bulk-import template designed with Katie.                                                                  |
| 26 June 2026 | The big bulk upload: ~2,774 certificates into the production collection (AFG_SGS) — 860+ kids CPCs and ~1,800 adult GCC exemptions across Morph, Morphsuits and Fun Shack. Compliance Hub built and deployed the same week. |
| 15 July 2026 | First Nicky Bigs batch prepared from Katie's new Dropbox drop: 256 SKUs classified (60 CPC / 181 GCC / 15 review). NOT YET SUBMITTED — waiting on a handful of answers (see section 8).                                     |
| 22 July 2026 | 2026 Shipments tracker built into the Hub from Eli's China→US ship list (2,776 children): 81.6% already submitted, 227 docs-ready, 283 outstanding.                                                                         |

## 7. Ongoing routines

| Trigger                             | What happens                                                                                                                                                                                  |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Katie adds certificates to Dropbox  | Tell Owen — the pipeline runs, a review workbook comes back with any questions, then the batch is uploaded and the Hub re-synced.                                                             |
| Eli issues a new ship list          | Drop the xlsx into the Hub's data/shipments folder and sync — the new list appears with its own progress bar.                                                                                 |
| Someone asks about a SKU            | Compliance Hub → SKUs page → search. The SKU detail page shows the live eFiling record.                                                                                                       |
| Monitoring shipping readiness       | 2026 Shipments page; Download FULL report for the work-list. Aim = 100% submitted before stock lands.                                                                                         |
| API token expiry (next: 4 Aug 2026) | Katie's login → eFiling admin dashboard → API portal → generate new token (note the secret phrase typed at generation). Update the two CPSC_ keys in Infisical and the Hub's .env on the VPS. |

## 8. Open items (as at 22 July 2026)

- **The 15 July Nicky Bigs batch** (183 shipping SKUs among them) is ready but needs: factory addresses for Hangzhou Hongrui and Yiwu Manwu; the actual factory behind the Jim's/Marsinos helmet range; battery documentation for 6 adult SKUs; decisions on 8 kids/adult conflicts; and a file-or-skip call on 3 SKUs holding certs but not live in PIM (NB70725, NB70291, NB95418).
- **283 shipping SKUs are Outstanding** (42 Morph Halloween, 31 Morph Christmas, 210 Nicky Bigs) — no certificates on file at all; these need sourcing from suppliers. The report's 1-MISSING tab is the definitive list.
- **Token renewal** due by 4 August 2026 (see section 7).

## 9. Who does what

| Person          | Role                                                                                                                                                                               |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Katie Greenwood | Compliance owner. Sources certificates from suppliers, drops them in the Dropbox folder, answers classification questions, owns the eFiling account (compliance@morphsuits.co.uk). |
| Owen Milloy     | Technical owner. Runs the processing pipeline with Claude, reviews and approves batches, maintains the Compliance Hub, monitors the shipments tracker.                             |
| Eli / Yee Lai   | Issues the China→US shipping SKU lists that define what must be certified each season.                                                                                             |
| Maciej          | VPS infrastructure (hosting for the Compliance Hub alongside other AFG apps).                                                                                                      |

## 10. Technical appendix

*For whoever maintains this next — the details that are easy to lose.*

### 10.1 eFiling API quirks

- Auth is non-standard: the Authorization header is the **raw JWT with NO “Bearer” prefix**, plus a second header x-api-secret carrying the plaintext seed phrase typed when the token was generated. Adding “Bearer” returns 401/403.
- The permission arrays inside the JWT are empty by design — roles resolve server-side. Do not regenerate the token to “fix” this.
- Requests need a browser User-Agent header or the WAF returns an HTML 403.
- Bulk imports: POST /import with doCertify=true sends certificates straight to Complete. Poll /getImportStatus, then read /getImportLog — but request logs in small chunks (~10) as large ones can 500.
- Trade parties (manufacturers/labs) must be flagged isNew=Y the first time they appear in the collection and N afterwards — pre-fetch /getTradeParties before a run.
- There is no endpoint listing valid citation codes; invalid ones are rejected at import (error 3007). Known-rejected: 4.3.8, 4.2, 1500, 4.3.

### 10.2 Compliance Hub internals

- Flask + SQLite, Docker container compliance-hub on the AFG VPS, host port 3031, behind nginx + SSL at efiling.afgmedia.co.uk.
- SQLite tables: skus (PIM mirror incl. parent links), planned (Katie's workbook + batch plans), efiling (live export mirror), shipments (ship lists), sync\_runs (audit).
- Loaders: sync\_pim.py, sync\_efiling.py, sync\_excel.py, sync\_shipments.py — all runnable from the UI buttons (POST /api/sync/<source>).
- Credentials come from environment variables (the VPS .env, gitignored) with a fallback to Owen's local Infisical vault helper — see creds.py. No secrets in the repo.

- Deploys: push to GitHub master, then on the VPS fetch + reset and docker compose up -d --build. Repo files on the VPS are root-owned — git commands need sudo with safe.directory.

### 10.3 Pipeline scripts (per-batch, dated copies)

| Script                                         | Job                                                                              |
|------------------------------------------------|----------------------------------------------------------------------------------|
| extract_new_<date>.py                          | Parse every new document in the Dropbox folder into structured JSON              |
| match_plan_<date>.py                           | Group by report, resolve SKUs against PIM, aggregate per-SKU plan                |
| fetch_pim_<date>.py                            | Cache full PIM product data for every matched SKU                                |
| classify_build_<date>.py                       | Classify routes and build the colour-coded review workbook                       |
| bulk_upload_kids.py /<br>bulk_upload_adults.py | The proven upload patterns from the June bulk (chunking, trade parties, logging) |