

# Automated Commercial Environment

Tips for Filing EPA Vehicles and Engines

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U.S. Customs and  
Border Protection



## Tips for Trade when filing an EPA Vehicles and Engines ACE PGA Message Set

### Determining Filing Requirements:

To determine if you need to file a Vehicle and Engine (V&E) Declaration, formerly the forms 3520-1 (on road) and 3520-21 (non road), please check with the V&E hotline at (734) 214-4100 or by email at [Imports@epa.gov](mailto:Imports@epa.gov).

Note: Original Equipment Manufacturers (OEMs) may not be required to file Vehicle and Engine Declarations. Please check the guidance in the link below.

<https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ3X.pdf>

<https://www.epa.gov/importing-vehicles-and-engines/publications-and-forms-importing-vehicles-and-engines>

### Disclaims for ACE:

If an HTS code in ACE is flagged for EPA Vehicles and Engines, but you have determined that you are not filing the EPA data electronically, determine the correct disclaim code to provide.

**If you do not need to file** a EPA Vehicles and Engines Declaration, use disclaim code

A = product is not regulated by this agency

**If you are filing due to specific EPA guidance**, such as special OEM cases, use disclaim code

B = data is not required per agency guidance

**If you cannot file electronically using the ACE PGA Message Set** for the Vehicles and Engines Declaration, you will need to follow the paper declaration process. The paper declaration can be provided either as a scanned image to DIS, or as paper with the shipment. For this process, the disclaim codes are one of the following

C = data filed through other agency means (uploading to the document image system (DIS))

D = data filed through paper

### Tips for Filing

For questions on how to file, please refer to your Software Provider's training and guidance. In addition, please keep in mind these important items:

- Have the Test Group/Engine Family Name from the label (LPCO Field) -this is the key information for a vehicle or engine that has been certified and can be imported.

- Make sure it is correctly formatted – include periods or dashes
- For information on finding the label, please see : <http://www.epa.gov/importing-vehicles-and-engines/locating-vehicle-emissions-label>
- To check google for a valid Test Group Name/Engine family name:  
Use the engine family name or test group name as the search parameter in google (or whichever search engine you use). If it is a valid number search results will be provided for EPA and for CA California numbers. If not, then you likely have an invalid number which may be a simple typo. All it takes to fail a filing and get an ‘under review’ is to have a decimal in the wrong spot or one number or letter typed wrong.
- If you do not get google results you can dive deep on the following EPA web pages:  
for highway vehicles and engines  
<https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-and-engines>  
  
for everything else  
  
<https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-engines-and-equipment>

- Provide the proper Entity Role Codes and their relevant information based on Document ID and Import Code (IM, MF, CI, DFP, STL).
- Verify the correct VIN, Serial Number, or Engine Number is provided.
- Form 3520-1 when declaring Import Code A, C, U, Y, or Z requires a minimum of one (1) PG10 record with a “V06” commodity qualifier code used to report the **Model Year** in the Commodity characteristic description field. Additionally, Import code U requires a second PG10 record reporting the Engine Power Rating of “V03” commodity qualifier code with a kilowatt (KW) or horsepower (HP) designation for the commodity characteristic qualifier, and the power rating in the Commodity characteristic description field.

Table 1: Commodity Qualifier Codes

<i>Data Element</i>	<i>Code</i>	<i>Definition</i>
Commodity Qualifier Codes (Provides context to the description field)	V02	Body type.
	V03	Engine power rating (kW or HP).
	V05*	Manufacture date of the vehicle or engine.
	V06	Model year of the vehicle or engine.

- Example: PG10 record when using Import Code of A.
  - PG10 V06 2012 (spacing is not correct).

- Form 3520-21 requires a minimum of one (1) PG10 record with a “V05” commodity qualifier code. The V05 Commodity Qualifier Code when used in conjunction with an appropriate Commodity Characteristic Qualifier is used to report the **“location”** of the manufacture date in the Commodity Characteristic Qualifier element, and not the actual date, which is collected on the PG07.

Table 2: Commodity Characteristic Qualifier

<i>Data Element</i>	<i>Code</i>	<i>Description</i>
<b>Manufacture Date (For use when V05 is Commodity Qualifier)</b>		
Commodity Characteristic Qualifier (For V05 describes location of manufacture date)	ENG	The manufacture date is obtained from the engine.
	VEH	The manufacture date is obtained from the vehicle.
	OTH	The manufacture date is not obtained from the engine or the vehicle. It is obtained from other resources. Importer must put explanation in the Commodity Characteristic Description field.

- Example: This PG10 record comes from section below of the 3520-21 form. If the “on engine” box is checked the corresponding record would look like below
  - PG10 V05 ENG (spacing is not correct).

Identify the engine (or vehicle) build date:

\_\_\_\_\_ month \_\_\_\_\_ year  on engine  other (explain)

***Test Group/Engine Family is required for Import Codes: B, F, 1, and 22***

Others may be conditionally required based on circumstances, certificates of conformity, age, etc.

Please refer to the CBP CATAIR and EPA Supplemental for more details and samples:

<https://www.cbp.gov/trade/ace/catair>