

## 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 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).

### 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>
- 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 3520-21 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. The table below is the acceptable codes for the 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 this:  
PG10 V05 ENG (spacing is not correct).

Identify the engine (or vehicle) build date: _____ month _____ year <input checked="" type="checkbox"/> on engine <input type="checkbox"/> other (explain)
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Please refer to the CBP CATAIR and EPA Supplemental for more details and samples:  
<https://www.cbp.gov/trade/ace/catair>