`The Clean Air Act prohibits importation into the U.S. of any motor vehicle, motor vehicle engine, non-road engine, or equipment that does not conform to EPA emission standards and requirements. U.S. EPA emission standards have been in effect for light-duty motor vehicles since 1968, motorcycles since 1978, heavy-duty on-highway engines since 1970, non-road engines since 1996, marine engines since 1997, and recreational vehicles (dirt bikes, ATVs, ORUVs, and snowmobiles) since 2006. These standards apply to new or used vehicles and engines, including, imported motor vehicles, heavy-duty engines, non-road engines, and recreational vehicles, whether manufactured domestically or abroad.

Vehicle and Engine imports are separated into two regulatory categories based on the EPA Forms 3520-1 and 3520-21. Form 3520-1 is used for importing light-duty, on-road vehicles and engines such as passenger vehicles, highway motorcycles, and corresponding engines. Form

3520-21 is for heavy-duty highway engines and non-road engines. Both forms have a corresponding PGA Message Set, demonstrated by the following V&E Samples.

Form 3520-1 is used for importing light-duty, on-road vehicles and engines such as passenger vehicles, highway motorcycles, and corresponding engines.

**Vehicles and Engines Pilot filing requirements:**

The pilot only covers imports that have received EPA certification or have received an EPA exemption letter. The subset codes applicate to the pilot are:

* A (Import by an ICI)
* B (US Certified)
* F (US Certified – catalyst restoration)
* G (Repair / Alteration Exemption)
* I (Testing Exemption)
* K (Display Exemption)
* L ( Racing Exclusion)
* O (Nonresident Exemption)

The following are the potential PGA records associated with submitting V&E Data regulated by Form 3520-1.

|  |
| --- |
| **Description** |
| Commercial description of the shipment  |
| Government Agency Program Code (EPA) |
| Program Code (VNE) (and Disclaimer) |
| Product Identifier |
| Model, Manufacture Date and item Identifier Number |
| Characteristics of the Product or Component |
| Licenses, Permits, Certificate, or exemptions issued by EPA (LPCO) |
| Entity Role, Entity Identification, Entity Name, and Entity Address 1. |
| Entity Address line 2, Apartment/Suite, City, State, and Zip/Postal Code |
| Individual Name, Telephone Number, Fax number, and email address |
| Identifies Entity from the above and additional roles |
| Importers Substantiating Documents, Document Identifiers, Conformance Declarations, and Declaration Certifications |

**Commercial Description:** The commercial description of the product.

For example, Lamborghini Aventador

**Government Agency Code**: EPA

**Government Agency Program:** VNE

**Electronic Image Submitted:** Optionally required if image of label, letter, or additional information is provided for the Entry. Such information may be provided in an attempt to prevent a “***Documents Required***” request later. If code is provided, the image must be submitted to DIS at the time of its correlating Entry/PGA message set.

**Disclaimer:** A code declaring filing does not require EPA data

|  |  |
| --- | --- |
| ***Disclaimer Codes*** | ***Description*** |
| A | Product is not regulated by this agency |
| B | Data is not required per agency Guidelines |
| C | Data filed through other agency means |
| D | Data filed through paper |

\*Codes A&B are NOT allowed if the HTS is flagged as “Must Be” Provided

**Product /Component Level Identifier**: Indicate whether or not the information being provided relates to a product (P) or a component (C) of a product. Do not report data elements or records that are general to the product as a while at the component level.

**Trade or Brand Name, Model, Manufacture Year and identifying numbers**

|  |  |
| --- | --- |
| ***Trade Name / Brand Name*** | ***Description*** |
| Model | Commercial Model Number of the Vehicle or engine |
| Manufacture Month and Year\* | Manufacture date of Vehicle or engine |
| Item Identity Number Qualifier | ENN – Engine NumberSE – Serial NumberAKG – VIN |
| Item Identity Number | The actual number of the qualifier above |

If imported as a whole, you will use this twice. Once to record the Model, manufacturer and VIN of the whole and once to record the information related to the Engine (serial numbers, etc.). This record may be repeated, as needed.

For 3520-1 entries with an Import code of U, A, C or Z the following additional information is required, at least once.

|  |  |
| --- | --- |
| ***Additional Information Required for goods subject to EPA*** | ***Description*** |
| Commodity Qualifier Code | V05 \*– Manufacture date of the vehicle or engine.V06 – Model year of the vehicle or engine |
| Commodity Characteristic Qualifier | ENG – Manufacturer Date is obtained  from the engineVEH – The manufacturer date is obtained from the VehicleOTH – The manufacture date is obtained from other resources. (with  Explanation) |
| Commodity Characteristic Description | Free form description of the item, either supplemental data to above, or in place of the above. |

\*Requires the location of the manufacture date, not the actual date

**Licenses, Permits, Certificates or Other (LPCO)**: This records is required at least once for the following codes and information:

Codes A, B, C, F, J, Z – Test Group or Engine Family Name (in lieu of Certificate of Conformity)

Codes G, I, K, L, O – Exemption Number (in the Importer’s EPA letter of Approval)

(For codes G, I, K and J, Bond Policy Number is also required later)

|  |  |  |  |
| --- | --- | --- | --- |
| ***Licenses, Permits, Certificates, Other*** | ***Code*** | ***Description*** | ***Required for Import Code*** |
| LPCO Transaction Type(Categorizes the duration/type of LPCO) | 123 | Single UseContinuousGeneral |  |
| LPCO Type | EP4EP7EP9 | Test Group/NumberEPA Bond Policy Number(Exhaust Engine Family Name)EPA Vehicle & Engine Exemption Number | A, B, C, F, J, ZG, I, K, JG, I, K, L, O |
| LPCO Number |  | LPCO Information (i.e. exemption # from approval letter |  |

**List of Entity Role codes applicable to EPA Message Sets:**

|  |  |
| --- | --- |
| ***Data Element*** | ***Description*** |
| Entity Role Codes | IM - ImporterDFP - OwnerMF - ManufacturerSTL - Storage LocationCI - Certifying Individual |
| Entity Address 1 | Line 1 of the Street Address being described. |
| Entity Address 2 | Line 2 of the Street Address, if needed |
| Entity Apartment/Suite | For Example 102A |
| Entity City | For Example – SAN DIEGO |
| Entity State/Province | For Example – CA. |
| Entity Country | For Example – US |
| Entity Zip/Postal Code | For Example - 92169 |

**Individual Point of Contact:** Name, Address, Phone Number and Email. Required when the entity is the Owner, Importer, Storage Location Contact and Certifying Individual.

|  |  |
| --- | --- |
| ***Point of Contact*** | ***Description*** |
| Individual Qualifier | IM - ImporterDFP - OwnerMF - ManufacturerSTL - Storage LocationCI - Certifying Individual |
| Individual Name | For Example: Angelo Giovanni |
| Telephone Number | 5551234567 |
| Email Address or Fax number | Angelo.Giovanni@test.com |

Importers Substantiating Documents and Conformance Declarations and Certifications

|  |  |
| --- | --- |
| ***Substantiating Documents*** | ***Description*** |
| Importers Signed Document or Confirmation letter | Y – Indicates the importer has the document needed to import the product under agency jurisdiction. Required for all entries. |
| Document Identifier | 942 – EPA 3520-1 |
| Conformance Declaration |  |
| Entity Role Code | CI |
| Declaration Code | EP2 – Certification Statement (3520-1) |
| Declaration Certification | Y – Certifies data is correct and documents have been provided |
| Date of Signature | Date EPA 3520-1 was signed |
| Invoice Number | Invoice number of Supplier |

DIS forms required:

<http://www.cbp.gov/sites/default/files/documents/ACE%20PGA%20Forms%20List%20-%20September%202015.pdf>

**Cargo Release Status Notification - Pending**

**HTS Codes** <http://www.cbp.gov/sites/default/files/documents/ACE%20HTS%20to%20PGA%20Reference%20Guide.pdf>

**For questions about EPS for V&E 3520-1, please contact:**

Office of Transportation and Air Quality, U. S. EPA

Compliance Division

EPA Imports Hotline (734) 214-4100

Imports@epa.gov

**EPA Supplemental Guide:**

The PGA Message Set chapter/implementation guide related to EPA can be found at:

<http://www.cbp.gov/document/forms/epa-supplemental-catair-guidelines>

The CATAIR chapters and appendices can be found on CBP.gov at:

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

APPENDIX A – Attached

APPENDIX A

| ***Import Codes (EPA Form 3520-1)*** |
| --- |
| **Import  Code** | **Vehicles and Engines Required Data element** |
| B | Image of US EPA emission control label in the engine compartment |
| F | Image of US EPA emission control label in the engine compartment |
| EE | Canadian emissions control label or letter from OEM or Registration/Title |
| Certification of not importing for lease or resale |
| FF | Certification that labeling, warranty and CAFÉ requirements will be met |
| Canadian emissions control label, letter from OEM, or Registration or title |
| M | Explanation of exemption* Canadian vehicle received by US resident
* Importer is either permanently emigrating to the US or will reside for greater than one year with a student or work visa
 |
| Explanation of exemption* Importer has an EPA hardship letter
 |
| E | N/A |
| L | Exemption Number |
| U | Model year and Power rating |
| W | Test Group Name/ Engine Family Number |
| Or statement if Test Group Name/ Engine Family Number is pending |
| Y | Model Year and Fuel type |
| G | Exemption number and CBP bond number |
| I | Exemption number and CBP bond number |
| K | Exemption number and CBP bond number |
| N | Letter from Department of State (DIS filing) |
| O | Exemption number |
| A | Test Group Name/ Engine Family Number |
| Model year |
| C | Model year |
| J | CBP Bond Number |
| Z | Model year |
| H | N/A |
| Q | N/A |

|  |
| --- |
| ***Import Codes (EPA Form 3520-1)*** |
| **IMPORT CODE** | **Vehicles and Engines Required Data Element** |
| 1 | Test Group Name / Engine Family Name |
| ***When combined with Industry Code G*** |
| Model Year |
| Bond Exemption Status |
| NAIC# for Bond Issuer |
| Bond Policy Number |
| 2 | Engine Label |
| 3 | Engine Label |
| Test Group Name/Engine Family Number |
| 4 | Engine Label |
| Test Group Name / Engine Family Number |
| 5 | Engine Label |
| Test Group Name / Engine Family Number |
| 6 | Engine Label |
| Test Group Name / Engine Family Number |
| 7 | Engine Label |
| Test Group Name / Engine Family Number |
| 8 | Letter from Engine Manufacturer |
| 9 | Model year |
| 10 | Exemption Letter (EPA letter of Approval) |
| 11 | Engine Label |
| Exemption Number (EPA Letter of Approval) |

|  |
| --- |
| ***Import Codes (EPA Form 3520-1)*** |
| 12 | Engine Label |
| Exemption Number (EPA Letter of Approval) |
| 13 | Engine Label |
| 14 | Letter from Department of State |
| Exemption Number |
| 15 | Engine label |
| 16 | Test Group Name/Engine Family Number |
| 17 | Model Year |
| 18 | Exemption Number |
| 19 | Power rating and Model Year |
| 20 | N/A |
| 21 | Explanation of Exemption |
| 22 | Model year and Power Rating |
| *Bond Exemption Status* |
| NAIC Bond Issuer Number |
| Policy Number |
| State of Issue |
| 23 | Power Rating |
| 24a | Model Year |
| Storage Location |
| 24b | Model Year |
| Storage Location |
| 24C | CBP Bond Number |
| 25 | Regulatory Citation for other exemption |