



# GUIDE FOR UPS® SHIP API USERS **CHANGE TO EU IMPORT RULES: PRODUCT IDENTIFIERS**

Important Notice: This guide is provided for informational purposes only. Exporters and Importers are solely responsible for the accuracy and completeness of all information submitted and for compliance with applicable laws and regulations. UPS customers should consult their customs broker or other qualified advisor with any questions regarding their compliance obligations.

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## OVERVIEW

The European Union (EU) is implementing new import requirements that will require Product Identifier (PID) information for certain business-to-consumer (B2C) shipments entering the EU. This change is part of the phased implementation of the removal of the €150 de minimis threshold.

To support compliance, UPS introduced new data requirements and enhancements across shipping systems. UPS Ship API integrations will need to support Product Identifier (PID) data elements for qualifying shipments.

Product Identifier requirements are scheduled to become effective for qualifying UPS Ship API transactions beginning **October 25, 2026**, supporting EU regulatory requirements effective November 1, 2026.

This guide helps UPS® Ship API users understand the updated developer specifications, identify the information required under the new regulations, and find answers to frequently asked questions.

**Note:** Regulatory exemption criteria depends on applicable EU requirements. Additional guidance on exemptions will be communicated as it becomes available.

### Recommended Actions:

1. Review the new Product Identifier requirements and updated Ship API documentation provided in this guide
2. Assess the impact on current UPS Ship API integrations
3. Begin development and testing planning activities
4. Finalise integration updates to ensure compliance when the Product Identifier requirement goes into effect.

**With enforcement beginning on November 1, we strongly recommend that shippers prepare immediately to meet the European Union's mandatory Product Identifier requirements.**

# Summary of changes to EU import rules: Product Identifiers (PIDs)

## What are Product Identifiers (PIDs)?

PID are codes used to identify manufacturers, sellers and products. Since July 1, 2026, the EU has required a PID for every product imported into the EU through a B2C shipment, regardless of its value.

**As of November 1, 2026, EU authorities will enforce this requirement, and PID codes will be required for customs clearance.**

## What Product Identifiers are required?

- Merchant PID – mandatory for qualifying non-exempt products  
*The seller/platform's own product identifier assigned to the listing*
- Manufacturer PID – mandatory for qualifying non-exempt products  
*The producer/brand's model, part number, etc.*
- Standardised PID – required, if exists for the product  
*Internationally recognised standard identifier (EAN/UPC/GTIN)*

These PIDs should be provided on the commercial invoice, noting the PID type for each commodity line item on eligible shipments (see example below).

| Line Item | Description                        | HS Code       | Country of Origin | Color | Size  | Merchant Product ID | Manufacturer Product ID | Standardized Product ID | Quantity | Value (\$)<br>USD | Total Value (\$)<br>USD |
|-----------|------------------------------------|---------------|-------------------|-------|-------|---------------------|-------------------------|-------------------------|----------|-------------------|-------------------------|
| 1         | Men's 100% Cotton Crewneck T-Shirt | 6109.10.0012  | VN                | Blue  | Large | 111111              | PB987654                | ILY143143               | 2        | \$12.00           | \$24.00                 |
| 2         | Men's 100% Cotton Crewneck T-Shirt | 6109.10.0012  | VN                | Red   | Large | 222222              | PB876543                | ILY143143               | 1        | \$12.00           | \$12.00                 |
| 3         | Handmade Ceramic Vase              | 6912.00.89.00 | US                | Green | 502ml | 333333              | WB123456                | No                      | 1        | \$40.00           | \$40.00                 |

Note: PIDs must be included in the item description field of the commercial invoice and entered in the suggested order. This applies whether you use your own commercial invoice or one generated by UPS.

## When are Product Identifiers required?

The Product Identifier requirements will apply when all the following conditions are met:

- Shipment origin is outside the European Union
- Shipment destination is within the European Union
- Shipment is identified as B2C
- Shipment is designated as "For Sale"

## What Shipment Qualification Data determines if PIDs are required?

- Commodity Category Exemption Indicator
- Shipper Type Value
- Consignee Type Value
- Reason for Export

Please ensure these values are available within your shipping workflows, as they will be used to determine whether PID information is required.

## Which products are exempt from the Product Identifier requirements?

- Unprocessed agricultural and perishable goods
- Handmade and artisan goods
- Antiques, collectibles, art, stamps, and coins

The product categories listed above are subject to an administrative tolerance. These goods do not typically have manufacturer or merchant product identifiers. This includes unprocessed agricultural goods covered by Chapters 1-15, handmade and artisan goods classified under the applicable tariff codes, and antiques, artwork, stamps, and coins classified under Chapter 97. For these products, Customs will consider the Product Identifier requirement met when the Merchant Product ID and Manufacturer Product ID fields are provided in the respective data fields.

**What this means for your shipping data:** You are responsible for determining whether the goods you are shipping require Product Identifiers or qualify for an administrative tolerance category. For products that qualify, UPS will automatically populate the prescribed conventional values. You do not need to include these values in your data feed. However, your shipment data must include the appropriate classification to support the applicable tolerance category.

To identify exempt products, use the **Commodity Category Exemption Indicator**.

**PID information may still be provided for exempt products and is not expected to trigger validation errors.**

## What happens if I do not provide the Product Identifiers when required?

From October 25, 2026, Merchant PID and Manufacturer PID will be required for non-exempt products. If PID information is missing, the shipment may fail validation and not be processed. Please review your validation logic.

PID requirements apply at the individual product level (commodity invoice-line level). If your shipment contains multiple products, some may require PID information while others may be exempt.

## Ship API Updated Documentation

### Existing Data Elements Used

The following existing Ship API elements will continue to be used to determine whether PID requirements apply.

| Field           | Description                                 | Values                                  |
|-----------------|---------------------------------------------|-----------------------------------------|
| ReasonForExport | Indicates shipment export reason            |                                         |
| ShipperType     | Identifies shipper as Business or Consumer  | 01 = Business, 02 = Consumer/Individual |
| ConsigneeType   | Identifies receiver as Business or Consumer | 01 = Business, 02 = Consumer/Individual |

### Existing Field Locations

| Field           | XPath                                                                               |
|-----------------|-------------------------------------------------------------------------------------|
| ReasonForExport | /ShipmentRequest/Shipment/ShipmentServiceOptions/InternationalForms/ReasonForExport |
| ShipperType     | /ShipmentRequest/Shipment/ShipperType                                               |
| ConsigneeType   | /ShipmentRequest/Shipment/ConsigneeType                                             |

### New Product Identifier Data Elements

The following new fields will be introduced to support EU Product Identifier requirements.

| Field                            | Description                                                        |
|----------------------------------|--------------------------------------------------------------------|
| ProductIdentifierExemptIndicator | Indicates whether the product qualifies for a regulatory exemption |
| ProductIdentifier                | Container for Product ID information                               |
| ProductID                        | Product identifier value                                           |
| ProductIDTypeCode                | Indicates Product ID type                                          |

## Product Identifier Exempt Indicator

For qualifying EU inbound B2C sales transactions, the *ProductIdentifierExemptIndicator* will default to false. This field is used to identify products that qualify for regulatory exemptions.

## New Field Specifications

| Field                            | XPath                                                                                                                  | Length    | Allowed Values   |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------|-----------|------------------|
| ProductIdentifierExemptIndicator | /ShipmentRequest/Shipment/ShipmentServiceOptions/InternationalForms/Product/productIdentifierExemptIndicator           | 1         | True / False     |
| ProductIdentifier                | /ShipmentRequest/Shipment/ShipmentServiceOptions/InternationalForms/Product/ProductIdentifier                          | Container | N/A              |
| ProductID                        | /ShipmentConfirmRequest/Shipment/ShipmentServiceOptions/InternationalForms/Product/ProductIdentifier/ProductID         | 100       | Text             |
| ProductIDTypeCode                | /ShipmentConfirmRequest/Shipment/ShipmentServiceOptions/InternationalForms/Product/ProductIdentifier/ProductIDTypeCode | 4         | See values below |

## Product ID Type Codes

| ProductIDTypeCode | Description                     | Requirement                                            |
|-------------------|---------------------------------|--------------------------------------------------------|
| 0100              | Merchant Product Identifier     | Required when ProductIdentifierExemptIndicator = False |
| 0200              | Manufacturer Product Identifier | Required when ProductIdentifierExemptIndicator = False |
| 0300              | Standardised Product Identifier | Optional                                               |

## Sample Request Structure

XML

1

<v13:Product>

2

<v13:productIdentifierExemptIndicator>false</v13:productIdentifierExemptIndicator>

3

4

<v13:ProductIdentifier>

5

<v13:ProductID>SKU-12345</v13:ProductID>

6

<v13:ProductIDTypeCode>0100</v13:ProductIDTypeCode>

7

</v13:ProductIdentifier>

8

9

<v13:ProductIdentifier>

10

<v13:ProductID>MFG-67890</v13:ProductID>

11

<v13:ProductIDTypeCode>0200</v13:ProductIDTypeCode>

12

</v13:ProductIdentifier>

13

14

<v13:ProductIdentifier>

15

<v13:ProductID>HS-1234567890</v13:ProductID>

16

<v13:ProductIDTypeCode>0300</v13:ProductIDTypeCode>

17

</v13:ProductIdentifier>

18

</v13:Product>

19

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