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Mandatory Product Identifiers: Why Product Data Is Now Customs Data

The EU PID Requirement, Mandatory from 1 November 2026

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Executive Summary2

 What Is in Scope3

01 · A PID Means Up to Three Data Elements4

 Complementary, Not Interchangeable4

02 · No Website Can Issue a PID5

 Why Searching for a Barcode Is Not a Process5

03 · A Customs Obligation Built on Product Data6

 Preserving Product Identity End to End.....6

04 · Why This Matters Now7

Conclusion: The Bottom Line7

 Conclusion: The Bottom Line7

About Hurricane Commerce.....8

Executive Summary

From 1 November 2026, Product Identifier (PID) data becomes mandatory for B2C consignments imported into the EU, regardless of the value of the goods. The requirement is voluntary from 1 July 2026, creating a short implementation window before enforcement begins.

A PID is not a single new reference number, and it is not something a business can apply for. It is a set of up to three separate identifiers for each individual product in a consignment, assembled from the seller’s own catalogue, its suppliers and recognised industry barcodes. That makes the requirement less a customs-filing change than a test of whether a business can describe, precisely and consistently, every item it sells.

This paper sets out what the three identifiers are, where each one legitimately comes from, and what a process capable of carrying them into the customs declaration actually looks like.

A catalogue-data issue can now become a customs-clearance issue.

What Is in Scope

The practical scope is straightforward: it concerns goods sold directly to consumers in the EU, including sales through marketplaces, where the goods are imported into the EU customs territory. The seller's location is not the determining factor; the relevant event is a B2C consignment entering the EU. Carrier guidance identifies an exception for B2B imports to VAT-registered recipients in the destination country.

EU · VOLUNTARY	EU · MANDATORY	SCOPE	PER PRODUCT
1 Jul '26	1 Nov '26	B2C	Up to 3
PID data accepted voluntarily	PID required on B2C imports	All values — no threshold applies	Identifiers per declaration line

A PID Means Up to Three Data Elements

A PID is not one new reference number. It is a set of up to three separate identifiers for each individual product in a B2C consignment imported into the EU.

Identifier	Meaning	Typical source
Merchant Product Identifier	The merchant's unique reference for the sellable item	SKU, item code or product code in the seller's catalogue
Non-standardised Manufacturer Product Identifier	The manufacturer's or supplier's individual product reference	Model number, part number or supplier reference
Standardised Manufacturer Product Identifier	A recognised industry identifier, only where it exists	GTIN, EAN, UPC or ISBN from packaging or the brand owner

Complementary, Not Interchangeable

The three fields are complementary, not interchangeable. A retailer's SKU may be the best reference inside its own systems, while a manufacturer's model number may identify the product in technical records. A GTIN, EAN, UPC or ISBN can provide an industry-recognised identifier for the same exact retail item.

No Website Can Issue a PID

There is no EU portal where businesses can apply for, buy or download a PID. Nor is there a single universal code that makes an item compliant.

The information must be created, captured and governed through the seller's own product-data processes. The merchant identifier is normally the seller's SKU or internal item number. Manufacturer model and part numbers need to come from the supplier or brand owner, while recognised barcode-based identifiers should be verified against reliable product, packaging or brand-owner information.

Where each identifier legitimately comes from

- Merchant identifier — the seller's own SKU or internal item number
- Manufacturer model and part numbers — the supplier or brand owner
- Standardised identifiers — verified against reliable product, packaging or brand-owner information

Why Searching for a Barcode Is Not a Process

Simply searching the internet for a barcode is not an effective compliance process. An online listing may relate to a different product version, colour, size, pack quantity, market or bundle. The identifier must relate to the exact sellable unit being declared to customs.

The EU's intent is to improve product traceability, enabling customs authorities to identify and target unsafe or non-compliant goods more effectively. For sellers, this means a catalogue-data issue can become a customs-clearance issue.

Preserving Product Identity End to End

A robust process needs to preserve the product identity all the way through the transaction.

1 Onboard With a Unique SKU

A product is onboarded with a unique merchant SKU.

2 Capture the Other Identifiers

Available supplier or manufacturer references and standardised identifiers are captured.

3 Validate Against the Exact Variant

The data is validated against the precise variant, size, colour, configuration or pack size being sold.

4 Carry the Data Into the Declaration

The identifiers travel with the order into the commercial invoice, carrier platform and customs declaration.

5 Catch Gaps Before Dispatch

Missing, conflicting or unverified data is identified before the consignment enters the carrier network.

Carrier guidance

- FedEx advises sellers to provide PID information through the commercial invoice and shipping application
- It warns that incomplete or inaccurate identifiers can result in customs delays or shipment returns

The greatest challenge will be for high-volume ecommerce operations: broad catalogues, frequent product changes, several suppliers, multiple marketplaces and separate fulfilment or carrier systems.

In that environment, manually correcting product information at dispatch will not scale.

The right question is not, “Where can we get a PID?” It is: “For every product line we ship, can we show accurate, item-specific identifier data and transmit it successfully into the customs declaration?”

Conclusion: The Bottom Line

Product Identifiers are not a minor customs-data addition, a carrier formality or a number that can be sourced at the last minute. From 1 November 2026, any business shipping B2C consignments into the EU must be able to identify the exact product on every customs declaration line using up to three complementary data elements: its own merchant reference, the manufacturer’s reference and a recognised standard identifier where one exists.

At Hurricane Commerce, we are ready for the PID requirements, we can help you define what to use, and how to use it, and we will be able to validate that everything is in place and compliant with the legislative requirements.

Additionally, the message is clear: **the future of frictionless cross-border ecommerce depends on knowing exactly what is in every parcel and being able to prove it before it reaches the border.**

About Hurricane Commerce

Hurricane Commerce is a global trade intelligence company. Through the Global Trade Ecosystem (GTE), Hurricane provides the data, decisions and automation that enable businesses to navigate complex regulatory environments with confidence. Clients include international carriers, postal operators, freight forwarders, e-commerce platforms and brands operating across the world's most demanding customs environments.

Find out how Hurricane can help your organisation get product data declaration-ready before November.

Visit: hurricanecommerce.com | Email: sales@hurricanecommerce.com

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**Know what is in
every parcel.
And prove it before
the border.**

Hurricane Commerce

Global trade compliance and technology

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