The $1M Insurance Rule: COI Audit Checklist

Companion to "Amazon's $1M Insurance Rule: The COI Audit for Sellers Who Missed 2 November (2027 Guide)". Work it with your actual certificate of insurance (COI) in hand — not the invoice, not the binder.

Step 1 — Are you caught? (5 minutes)

- Seller Central → Settings → Account Info → **Business Insurance**: status checked · any Amazon request/email found? Date of email: ___
- Every ASIN walked, active **and** dormant — in or near an enhanced-safety category? (Children's products · cosmetics · ingestibles · lithium-battery products are the publicly named ones; Amazon's full list is behind Seller Central login and says it is not limited to those)
- Borderline ASINs checked by their Seller Central category/product type, not by what you call the product
- Old trigger also checked: gross proceeds over **$10,000 in any single month** at any point? (If yes, you needed cover within 30 days of that month — and still do)

Step 2 — The six-point COI audit (10 minutes)

Point 1 — The name

- Insured name on the policy = the **legal entity name on your Seller Central account**, character for character
- No DBA · no abbreviation · no dropped "LLC" (single-member LLCs: Amazon notes an exception — confirm your exact case)

Point 2 — The additional insured

- The COI names, verbatim: **"Amazon.com Services LLC and its affiliates and assignees"**
- It is an **additional-insured endorsement** on the policy — NOT just Amazon typed in the certificate-holder box (the most common rejection reason)
- Asked the agent before paying/submitting: *"Will you issue a COI naming Amazon.com Services LLC and its affiliates and assignees as additional insured?"* — answer was an unhesitating yes

Point 3 — The limits

- Per-occurrence limit ≥ **$1,000,000**
- Aggregate limit ≥ **$1,000,000**
- Those limits apply to the **products** coverage — product liability is not sitting in a sublimit below $1M

Point 4 — The deductible

- Deductible ≤ **$10,000**
- The deductible amount is **printed on the COI** (if not: insurer reissues the certificate showing it)

Point 5 — The form

- Policy is **occurrence-based** (declarations page checked — not claims-made)
- Claims-made only if you hold Amazon's written confirmation for your case (a narrow children's-products exception has been reported by one seller — do not assume it)

Point 6 — The cover

- Policy includes **products / products-completed operations** and bodily injury cover
- Not premises-liability-only · not a shipping/cargo policy
- Policy covers **all sales from products listed on the Amazon.com store** (not just your website, not excluding the enhanced-safety ASINs)

The supporting cast

- Policy type is commercial general, umbrella, or excess liability
- Insurer rated **S&P A- or AM Best A-** or better, and can handle claims globally
- Insurer gives Amazon **≥ 30 days' notice** of cancellation, modification or nonrenewal
- Policy will still be **valid ≥ 60 days** on the day you submit the COI
- Document is the **complete, signed COI** — not a binder, endorsement alone, bill or invoice

Step 3 — If anything fails

- Document problem (name, missing endorsement, deductible not shown, stale COI)? → Insurer reissues a corrected certificate — usually free, usually days. **Do not submit the flawed COI first.**
- Policy problem (claims-made, products excluded, limits under $1M, deductible over $10,000)? → New or amended policy, shopped against the six points above; ask the Point 2 question before discussing price
- Submit via Seller Central → Settings → Account Info → **Business Insurance**; save the confirmation, the COI and the declarations page outside Seller Central
- Got an email from Amazon with a date? **That date is your deadline** (seller publications report a 45-day window from Amazon's email — reporting, not a guarantee; work to your email)

Based in mainland China?

- New policies since 2 Nov 2026 must come through the **Amazon Insurance Accelerator (AIA)** — Amazon rejects newly submitted non-AIA policies
- Existing compliant policy submitted before 2 Nov 2026: valid **until it expires** — expiry date diarised: ___
- AIA route opened at least a month before that expiry

Keep it compliant

- Calendar reminder set: **policy expiry minus 45 days**
- At every renewal: re-run all six points on the new certificate (watch for claims-made conversions, raised deductibles, dropped endorsements)

- Entity change (new LLC, rebrand, legal name change)? Update the policy name and the Seller Central legal name together
- Launching a first children's / cosmetic / ingestible / battery product? The requirement starts at unit one — premium budgeted into the launch