

UPDATE: EPA's TSCA PFAS Reporting Deadline Extended Until January 11, 2026

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On September 4, 2024, the United States Environmental Protection Agency (EPA) announced that it has delayed the reporting deadlines for its Toxic Substances Control Act (TSCA) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (TSCA Reporting Rule or Rule). The reporting deadline for most companies covered by the rule has been moved from May 8, 2025, to January 11, 2026. [Learn more](#) about complying with these multifaceted new regulations.

Pursuant to the rule, manufacturers and importers of perfluoroalkyl and polyfluoroalkyl substances (PFAS) for commercial uses, including articles, mixtures, or byproducts containing PFAS, were mandated to provide EPA with a myriad of information concerning these products, including information related to chemical identity, uses, volumes made and processed, byproducts, environmental and health effects, worker exposure, and disposal to EPA starting on November 12, 2024, and in any case no later than May 8, 2025. As a result of the new announcement, the data submission period will now open on July 11, 2025, and must be complete by January 11, 2026. Small businesses reporting data solely on importing PFAS contained in articles will have another six months—until July 11, 2026—to submit reports.

EPA reported that the delay in reporting is due to budget constraints that stopped ongoing software development and impacted the Central Data Exchange, where companies will report the required information. As a result, according to EPA, "the agency software application that will collect the PFAS data will not be ready by the original November 2024 reporting period opening date and it will thus be impossible for submitters to begin to submit data on that date."

While the 8-month delay will certainly be music to the ears of the thousands of companies required to comply with the TSCA Reporting Rule, companies should not ease up on efforts to collect the necessary information, as the scope of data required and the effort necessary to comply is extremely onerous. The rule directs manufacturers and importers to report all information that is "known or reasonably ascertainable" to the organization, which requires the manufacturer and/or importer to conduct a rigorous search for information within its control, including interviews of relevant employees and review of relevant documents within the company, as well as search outside the company through its supply chain for relevant information.