



Consumer products

HCT-202505-05

US EPA reissues PFAS reporting extension rule again

On May 13, 2025, US EPA issued an interim rule through a federal notice to adjust the data reporting rules for perfluoroalkyl and polyfluoroalkyl substances (PFAS) and PFAS-containing products in Section 8(a)(7) of the Toxic Substances Control Act (TSCA). The adjusted PFAS reporting time is as follows:

Category	Original reporting start time	Adjusted reporting start time	Original filing deadline	Adjusted filing deadline
Small Articles Importer	2025.07.11	2026.04.13	2026.07.11	2027.4.13
Other manufacturers (including importers)			2026.01.11	2026.10.13

The extension rule is an "interim final rule" and will take effect on May 13, 2025. The public can submit comments through the Federal Regulations Portal by June 12, 2025, and the comments must indicate the document identification (ID) number EPA-HQ-OPPT-2020-0549. EPA specifically reminds that information that is considered confidential business information (CBI) or other information that is subject to legal restrictions on disclosure may not be submitted electronically.

➤ Reasons for delay in PFAS declaration:

EPA found that it was not possible to provide notice and public comment on the extension of the deadline before the original filing opening date of July 11, 2025, because there was insufficient time. EPA needs more time to prepare the filing application to collect this data, and EPA is considering reopening public comment on parts of the rule. The delayed filing date ensures that EPA has sufficient time to consider public comments and propose and finalize changes to the rule before the filing period begins.

➤ Background on PFAS reporting:

On September 28, 2023, the U.S. Environmental Protection Agency (EPA) signed a final rule on the reporting and recordkeeping requirements for per- and polyfluoroalkyl substances (PFAS) in accordance with the requirements of Section 8(a)(7) of the Toxic Substances Control Act (TSCA). The rule was published in the Federal Register on October 11, 2023 and will take effect on November 13, 2023. **EPA requires that anyone who manufactures (including imports) or has manufactured (including imports) substances and mixtures (including articles) containing PFAS from 2011 to 2022 needs to electronically report existing information on PFAS uses, production, byproducts, disposal, exposure, and environmental or health effects.** On September 5, 2024, EPA announced a postponement of the reporting start date, postponing the reporting start date from November 12, 2024 to July 11, 2025. The reporting method is to fill out and submit the report form using EPA's Central Data Exchange (CDX) system. The CDX system link is <https://cdx.epa.gov/>.





Original link:

<https://www.federalregister.gov/documents/2025/05/13/2025-08168/perfluoroalkyl-and-polyfluoroalkyl-substances-pfas-data-reporting-and-recordkeeping-under-the-toxic>

HCT SOLUTION:

The PFAS reporting requirements under TSCA Section 8(a)(7) (40 CFR 705) require PFAS data to be traced back to the manufacturing (including import) period from 2011 to 2022. The EPA plans to postpone the implementation of the reporting, providing companies with more transition time. It is recommended that companies take full advantage of this opportunity to complete the data survey and prepare for the reporting. HCT Iris Testing has a wide range of testing areas and convenient service channels to help companies evaluate restricted chemicals in products so that your products meet the corresponding national or international requirements.

