



## Attention: U.S. EPA proposes further delay to PFAS reporting deadline

On April 9, 2026, the U.S. Environmental Protection Agency (EPA) issued a pre-publication notice regarding the final rule for PFAS reporting requirements under Section 8(a)(7) of the Toxic Substances Control Act (TSCA), proposing to once again adjust the reporting and record-keeping timelines for per- and polyfluoroalkyl substances (PFAS).

According to the new pre-publication rule, the start date for submitting PFAS reports will be adjusted to January 31, 2027—or 60 days following the effective date of a subsequent final rule regarding the substantive requirements for PFAS reporting—whichever date occurs earlier.

- Review of Rule Background:
  - ◆ 2023: The EPA issued the PFAS reporting rule (Trace back the data since 2011), setting the initial reporting deadline for November 12, 2024.
  - ◆ 2024: The deadline was extended for the first time, to July 11, 2025.
  - ◆ 2025: The deadline was extended again, to April 13, 2026.
  - ◆ 2026: The currently pre-published rule will postpone the reporting start date for a third time.
- In this pre-publication rule, the EPA stated that the current adjustments are primarily based on the following reasons:
  - ◆ A large volume of public comments remains to be further processed;
  - ◆ The subsequent "Final Rule" has not yet been finalized;
  - ◆ Enterprises require additional time to complete due diligence and data preparation;
  - ◆ The reporting system (CDX) still requires further refinement.

The primary objective of this adjustment is to alleviate short-term compliance burdens for businesses and to prevent duplicative preparatory work that might otherwise arise due to the rules not yet being finalized. Concurrently, it is crucial to note that in the proposed rules issued in November 2025, the U.S. Environmental Protection Agency (EPA) had outlined several significant potential exemptions. These included: the manufacture (including import) of mixtures or products containing PFAS at concentrations of  $\leq 0.1\%$ ; imported articles; specific byproducts; impurities; chemicals used for research and development; and non-isolated intermediates. However, the current pre-publication notice merely adjusts the commencement date for reporting; it does not render a final decision regarding the aforementioned exemptions. Whether these exemptions will ultimately be implemented remains to be clarified in the subsequent final rule.





Original link: <https://www.epa.gov/chemicals-under-tsca/update-reporting-deadline-tsca-pfas-reporting-rule>

## HCT SOLUTION:

The PFAS reporting requirements under Section 8(a)(7) of TSCA (40 CFR 705) mandate the retrospective submission of data regarding PFAS manufactured (including imported) between 2011 and 2022. The EPA plans to postpone the implementation of this reporting mandate, thereby providing companies with additional transition time. Given the characteristics of PFAS reporting—specifically its extensive look-back period, data complexity, and broad supply chain scope—companies are advised to leverage this extension window to complete their data collection and compliance planning as early as possible, thereby mitigating the risks associated with last-minute, concentrated reporting efforts.

