

2025 is Here: Are You Ready for PFAS Reporting?

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With 2025 officially underway, companies should be mindful of two key deadlines for submitting mandatory per- and polyfluoroalkyl substances (PFAS) information to North American regulators.

Most urgently, this coming **January 29** is the deadline for manufacturers and importers to file reports or seek an extension under a [Canadian PFAS reporting program](#) announced in July 2024.

In the United States, while the PFAS reporting deadline is not until January 2026 for most business, companies are urged to act now, if they have not already, to conduct the extensive due diligence required to complete the report.

The Canadian program requires any entity that manufactured or imported PFAS above certain thresholds to disclose to the Canadian government a variety of information, including PFAS identity, quantity, and concentration. Specific reporting requirements, including reporting thresholds, vary based on whether the PFAS is manufactured directly in Canada, imported into Canada, or imported into Canada as part of a product.

Reporting is due to the Canadian Minister of the Environment no later than January 29, 2025, though reporting entities may seek a one-time extension (which should be filed by January 22). To request an extension, entities must submit, among other things, the substance identifier for which they will eventually be reporting, the reason for the extension request, as well as the requested amount of time for the extension.

The U.S. Environmental Protection Agency (EPA or the Agency) [PFAS reporting rule](#), issued under Section 8(a)(7) of the Toxic Substances Control Act (TSCA), requires any entity that manufacturers, imports, or has manufactured or imported PFAS or PFAS-containing articles in any year since Jan. 1, 2011, to electronically report information regarding PFAS uses, production volumes, disposal, exposures, and hazards, among other things. Reporting obligations are less strenuous for entities that only imported articles containing PFAS. Reporting is mandatory for captured entities manufacturing/importing regulated PFAS regardless of PFAS quantity – unlike Canada, there are no *de minimis* exemptions to reporting.

EPA's on-line PFAS reporting system opens July 2025. Reporting entities are required to complete all reporting by January 11, 2026, and "small manufacturers" have until July 11, 2026.

Accumulating data internally, and requesting necessary data from upstream suppliers, can be a long, detailed-ridden, and laborious process. Reporters should begin collecting data now to ensure compliance with these deadlines and with the reporting requirements themselves.

For inquiries on these PFAS reporting rules or requesting an extension for the Canadian reporting

rule, please feel free to reach out to the authors of this post, [Joe Green](#) and [Zach Lee](#). Also, feel free to learn more about Kelley Drye's PFAS practice [here](#).