

# EPA Delays TSCA PFAS Reporting Period Until July 2025

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The U.S. Environmental Protection Agency (“EPA” or “the Agency”) has [announced](#) that it is delaying the reporting period for its controversial per- and polyfluoroalkyl substances (“PFAS”) disclosure rule eight months, with the submission period for the one-time report now beginning July 2025. The reporting period was originally scheduled to begin on November 12, 2024.

The Agency announced that the delay is due to “resource constraints.” In March, EPA’s TSCA program budget was slashed by \$5 million compared to what it was for the fiscal year 2023 budget. Given that the Agency is in the process of developing an entirely new online reporting platform for this rule, it is likely that budget cuts impacted the ability for EPA to rollout the platform on time.

The disclosure rule was initially promulgated in response to an amendment to the Toxics Substances Control Act (“TSCA” or “the Act”) that was tucked away in the National Defense Authorization Act for Fiscal Year 2020. The amendment added Section 8(a)(7) to the Act, which directs EPA to require PFAS reporting under TSCA. TSCA generally grants EPA the authority to set use restrictions and reporting, record-keeping, and testing requirements for certain chemical substances and/or mixtures that may pose an unreasonable risk to human health or the environment.

On June 28, 2021, EPA proposed [TSCA Section 8\(a\)\(7\) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances](#). After comments were received and reviewed, EPA published the [final rule](#) (“TSCA PFAS Reporting Rule”) on October 11, 2023, effective November 13, 2023. The rule requires any entity that manufactures, 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.

Despite the rule’s seemingly simple reporting requirements, companies will likely spend significant amounts of time, labor and resources ensuring that their mandatory disclosures are compliant. Indeed, there are over 15,000 types of PFAS identified so far, each with their own chemical makeup and profile.

Entities originally had until May 8, 2025 to report, and “small manufacturers” who are subject to the rule exclusively through article imports would have had until November 10, 2025. Now that the rule’s implementation is being delayed, the Agency notes that most reporters will be required to complete all reporting by January 11, 2026, with small manufacturers having until July 11, 2026.