

TSCA PFAS REPORTING DELAYED (AGAIN)

May 13, 2025

The United States Environmental Protection Agency (“EPA”) has announced it will again be extending the data submission period for the Toxic Substances Control Act (“TSCA”) Section 8(a)(7) reporting requirement for per- and polyfluoroalkyl substances (“PFAS”). According to an [interim final rule](#) published by the agency in the Federal Register on [May 13, 2025](#), the data submission period will now begin on **April 13, 2026**, rather than July 11, 2025 (the date previously slated for the beginning of the data submission period). The end of the reporting period has also been extended by nine months, from January 11, 2026, to **October 13, 2026**, for most reporting entities. As with the agency’s first extension of the reporting period announced in September 2024, EPA has indicated that this extension is necessary to ensure that its online data collection platform, which remains under development, is fully functional and vetted before the submission period opens.

As previewed by [EPA Administrator Lee Zeldin in his April 2025 announcement](#) in which he called for implementing TSCA Section 8(a)(7) “without overburdening small businesses and article importers,” the interim final rule extends the reporting period by an additional six months (until **April 13, 2027**) for small businesses that are reporting exclusively as article importers.

The interim final rule does not include any substantive changes to the PFAS reporting requirements – only to the reporting timeframe and deadlines. However, the agency noted in its summary of the interim final rule that it “is separately considering reopening certain aspects of the [TSCA Section 8(a)(7)] rule to public comment” and that the “delayed reporting date ensures that EPA has adequate time to consider the[se] public comments and propose and finalize any modifications to the rule before the submission period begins.”

For more information on what the most recent extension means for your company’s reporting process or to get started or get back on track with your PFAS reporting due diligence, please reach out to one of the BCLP PFAS Team members listed below.

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MEET THE TEAM



Thomas S. Lee

San Francisco

tom.lee@bclplaw.com

[+1 415 675 3447](tel:+14156753447)



Nora J. Faris

Denver / St. Louis

nora.faris@bclplaw.com

[+1 314 259 2209](tel:+13142592209)



Erin L. Brooks

Chicago / St. Louis

erin.brooks@bclplaw.com

[+1 312 602 5093](tel:+13126025093)



John R. Kindschuh

St. Louis

john.kindschuh@bclplaw.com

+1 314 259 2313

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