

U.S. Environmental Protection Agency



2025 TSCA PFAS Reporting Requirement Overview

The U.S. Environmental Protection Agency (EPA) has implemented a new reporting requirement under the Toxic Substances Control Act (TSCA) for Per- and Polyfluoroalkyl Substances (PFAS). This regulation mandates that manufacturers and importers of PFAS, and PFAS containing articles, report detailed information, with compliance deadlines set for 2026.



Key Reporting Requirements

- 1 Who Must Report?**
 Any entity that has manufactured or imported PFAS or PFAS-containing articles since January 1, 2011.
- 2 What Data Must Be Reported?**
 Manufacturing, processing, use, exposure, disposal, and health/environmental effects, annually.
- 3 What Compounds Are Included?**
 The rule covers over 1,400 PFAS compounds. There is not a de minimis exemption so vendors need to resubmit SDS with all percentages included.
- 4 Are Articles Included?**
 Yes. Unlike previous regulations, PFAS-containing articles are included in reporting obligations. Any solid material that are used generally in its current form that might have PFAS substances incorporated, such as in coatings (e.g., textiles, coatings, electronics).

Standard Reporting Deadline

January 11, 2026

Applies to all non-small businesses

Small Business Deadline *

July 11, 2026

Extended deadline for small businesses who only imported PFAS containing articles.



* If you have questions regarding small business deadlines and various exemptions call NTH to discuss.



Vendor Information Requirements for Importers

Importers must collect and report the following information from their vendors to comply with TSCA PFAS reporting requirements:

- **Chemical Identity & Concentration:** Confirmation of PFAS content, including specific chemical names and CAS numbers.
- **Manufacturing & Processing Data:** Details on how the PFAS was produced and if it underwent chemical transformation.
- **Intended Use & End Product Application:** Description of how the PFAS-containing material is used in the supply chain.
- **Volume of Importation:** Annual quantities of PFAS-containing products or raw materials imported.
- **Exposure & Environmental Impact Data:** Any available information on worker exposure, emissions, and environmental releases.
- **Disposal & Waste Management Practices:** Vendor protocols for handling PFAS waste and compliance with disposal regulations.
- **Streamlined reporting:** Streamlined reporting is available for importers of articles and for manufacturers of less than 10 kg of a substance used solely for research and development.

Definition of 'Reasonably Known'

Under TSCA, businesses are required to report information that is "reasonably ascertainable," meaning data that they possess or can reasonably obtain through standard business operations. This includes:

- Information available from existing records, contracts, or safety data sheets (SDS).
- Details vendors, suppliers, and third-party testing laboratories can provide.
- Information gathered through reasonable inquiry within the organization, including communications with employees or departments involved in procurement, compliance, or product development.

Companies are not required to conduct new testing, but must make reasonable efforts to collect and verify the necessary information to ensure accurate reporting.

What This Means for Your Business

Failure to comply can result in penalties. Understanding your reporting obligations early will help ensure timely compliance. If your company has manufactured or imported PFAS or PFAS-containing products since 2011, you must prepare now to meet the reporting requirements. A game plan to determine what meets a reasonable effort to obtain information from vendors and how to document that you have made sufficient effort. Because these products could be imported in articles, such as coated parts, cleaning supplies, cables, or clothes, a multidisciplinary team is recommended to help with this project.

Where Can You Get Help?

For more details or assistance in preparing your submission, please feel free to contact Laura Forquer, PE, CHMM with NTH at 231-660-1279.