



## EPA Extends Submission Dates for the PFAS Reporting Rule

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The EPA published an [interim final rule](#) in the Federal Register today (May 13, 2025) which extends the submission deadlines for the PFAS Reporting Rule. The revised deadlines to submit required PFAS reporting information will now start on **April 13, 2026**, and end on **Oct. 13, 2026**. The previous submission deadline was to start on July 11, 2025. Public comments on the reporting extension are due June 12. PFAS are per- and polyfluoroalkyl substances. EPA has identified at least 13,000 chemical substances that meet the definition of PFAS and are subject to the PFAS Reporting Rule.

EPA states that this submission extension will allow the agency to further develop and test the software being used to collect the data from manufacturers, thereby providing critical feedback to EPA, including what additional guidance would be useful for the reporting community.

Consistent with the Administration's deregulation agenda and Executive Order 14219: *Unleashing Prosperity Through Deregulations*, the May 13, 2025, interim final rule also includes an advisory statement that EPA is separately considering reopening certain aspects of the original rule to public comment in the future.

Under section 8(a)(7) of the Toxic Substances Control Act (TSCA), EPA finalized a rule in October 2023 requiring anyone who has manufactured (including imported) a PFAS in any year from 2011 through 2022 to submit information to EPA regarding manufacturing, use, disposal, byproducts, worker exposures, and environmental and health effects of those PFAS.

In addition to the unprecedented look-back period, the PFAS Reporting Rule requires companies to conduct a diligent inquiry into the presence of PFAS at their facilities and supply chains, assessing information that is "known or reasonably ascertainable" from upstream suppliers and downstream customers. Both internal and external inquiry are required.

Notably and separate from federal regulatory action, many states are imposing PFAS reporting requirements on manufacturers and marketers. Importantly, some states are restricting or outright prohibiting the use of PFAS in various product categories.

For additional information regarding the PFAS Reporting Rule, please see our [Alert](#) "*PFAS Reporting Requirements Persist Amid EPA Deregulation*" dated March 25, 2025.

### For More Information

Van Ness Feldman closely monitors and counsels clients on PFAS-related issues. If you would like more information about EPA actions involving PFAS, state programs with PFAS reporting requirements and use restrictions, and opportunities

to submit comments on proposed rules, please contact [Dana Stotsky](#), [Britt Fleming](#) or any member of our Environmental Team.

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