

## PFAS Reporting Rule Deadlines Extended – and More Changes to Come



**May 13, 2025**

### AUTHORS

Mark Duvall, Ryan Carra, Emily Schwartz

The U.S. Environmental Protection Agency (EPA) published an [interim final rule](#) on May 13, 2025, extending the reporting deadlines for its Per- and polyfluoroalkyl substances (PFAS) Reporting Rule, [40 C.F.R. Part 705](#), which mandates submission of data on PFAS. EPA also disclosed that it will soon publish a notice of proposed rulemaking to address other aspects of the

rule. The new deadlines appear in amended 40 C.F.R. § 705.20. Most reports on PFAS as chemicals are now due by October 13, 2026. Reports on PFAS in imported articles by small manufacturers are now due by April 13, 2027.

## Background

EPA [finalized](#) the PFAS Reporting Rule on October 11, 2023, under Section 8(a)(7) of the Toxic Substances Control Act (TSCA), as amended by Section 7351 of the National Defense Authorization Act for Fiscal Year 2020, [Pub. L. 116-92](#). This rule obligates any entity that manufactured or imported PFAS from 2011 through 2022 to submit a one-time report to EPA regarding manufacturing, use, disposal, byproducts, worker exposures, and environmental and health effects of those PFAS. The initial deadline for most submissions was set for May 8, 2025, providing an 18-month reporting window from the rule's effective date. For article importers qualifying as small manufacturers, the reporting deadline was November 10, 2025.

In September 2024, EPA [extended](#) the original reporting deadline by eight months, until January 11, 2026. Under the May 13, 2025 interim final rule, that deadline is extended by another nine months, requiring most manufacturers to submit their reports by October 13, 2026. Under the September 2024 rule, for article importers that are also small manufacturers, EPA extended the deadline to July 11, 2026. In the May 13 rule, that deadline is now April 13, 2027.

## Analysis

This extension presumably gives EPA time to finalize its information-collection software. The [Full-Year Continuing Appropriations and Extension Act, 2025, Public Law 119-4](#) (the Continuing Resolution signed by President Trump on March 15, 2025) increased EPA's appropriation for environmental programs and management by \$17 million over the appropriation for Fiscal Year 2024, to \$3.195 billion. According to a House Appropriations Committee [report](#), the purpose of the increase was "to modernize the Environmental

Protection Agency's IT system to more efficiently complete chemical reviews, as requested by the Administration." The extra money will help EPA handle the expected influx of reporting under the PFAS reporting rule, [40 C.F.R. Part 705](#).

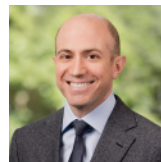
The extension also gives EPA time to decide whether to reopen other portions of the PFAS Reporting Rule for public comment. The interim rule comes after the April 28, 2025, PFAS action plan [announcement](#) in which EPA Administrator Lee Zeldin committed to implement Section 8(a)(7) in order "to smartly collect necessary information, as Congress envisioned and consistent with TSCA, without overburdening small businesses and article importers" (see B&D's alert [here](#)). It also follows a May 2, 2025, Section 21 petition from a coalition of chemical manufacturers arguing that standard TSCA exemptions for articles and impurities, a production-volume threshold, and other scope limitations should apply. We expect the proposed rule to incorporate at least some of those requested provisions.

While the delay to the start of the submission period is effective immediately, EPA will accept public comments on the revised reporting timeframe for 30 days, with comments due by June 12, 2025. Beveridge & Diamond is actively monitoring developments in this area and is ready to assist interested stakeholders prepare comments on the interim final rule and the expected notice of proposed rulemaking.

*Beveridge & Diamond's [Chemicals Regulation](#) practice group and [Chemicals](#) industry group provide strategic, business-focused advice to the global chemicals industry. We work with large and small chemical and products companies whose products and activities are subject to EPA's broad chemical regulatory authority under TSCA and state chemical restrictions.*



**Mark Duvall**  
Principal, Washington, DC  
[mduvall@bdlaw.com](mailto:mduvall@bdlaw.com)  
+1.202.789.6090



**Ryan Carra**  
Principal, Washington, DC  
[rcarra@bdlaw.com](mailto:rcarra@bdlaw.com)  
+1.202.789.6059



**Emily Schwartz**  
Associate, Seattle  
[eschwartz@bdlaw.com](mailto:eschwartz@bdlaw.com)  
+1.206.620.3045

## ABOUT B&D

Beveridge & Diamond's more than 160 lawyers across the U.S. focus on environmental and natural resources law, litigation, and alternative dispute resolution. We help clients around the world resolve critical environmental and sustainability issues relating to their products, facilities, and operations.

Learn more at [bdlaw.com](https://www.bdlaw.com)

The content of this alert is not intended as, nor is it a substitute for, legal advice. You should consult with legal counsel for advice specific to your circumstances. This communication may be considered advertising under applicable laws regarding electronic communications.