

October 5, 2026

The Honorable Doug Troutman
Assistant Administrator
Office of Chemical Safety and Pollution
Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

The Honorable C. Paige Hanson
Chief Financial Officer and Chief
Administrative Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Re: Successful Implementation of TSCA Section 8(a)(7) PFAS Reporting Requirements
(Revision to Regulation, 90 Fed. Reg. 50,923 (Nov. 13, 2025), EPA-HQ-OPPT-2020-0549)**

Dear Assistant Administrator Troutman and Chief Financial Officer and Chief Administrative Officer Hanson:

The undersigned organizations write regarding implementation of the Toxic Substances Control Act (TSCA) Section 8(a)(7) reporting requirements for per- and polyfluoroalkyl substances (PFAS) (PFAS Reporting Rule).

We represent manufacturers, innovators, and downstream users across the U.S. economy. Collectively, our members span the broad business community including the chemicals value chain and the advanced manufacturing sectors it supports. We support Congress's objective of collecting meaningful PFAS information to inform sound policymaking and regulatory decision-making. Consistent with that objective, our organizations remain committed to complying with applicable reporting requirements and providing responsive information to the Environmental Protection Agency (EPA).

We appreciate EPA's efforts to revisit the PFAS Reporting Rule and consider stakeholder feedback regarding implementation challenges. This reporting obligation is unprecedented in scope and complexity, requiring companies to collect, evaluate, and report information looking back over many years of historical manufacturing and import activity. As EPA moves toward finalization of the revised proposed rule, the Agency's primary objective should be the collection of accurate, complete, and actionable information that can support informed decision-making. Achieving that objective will require a reporting framework that is practical, transparent, and capable of being implemented consistently across affected sectors.

Successful execution of this reporting obligation will depend on a publicly available and fully functional reporting tool and complete guidance that aligns with the final rule. A reporting program supported by clear instructions, a thoroughly tested and fully functional reporting tool, and sufficient preparation time will better enable EPA to obtain high-quality information while promoting compliance across the regulated community. Likewise, a clear and predictable implementation framework that includes a publicly available tool and reporting

guidance will help companies dedicate appropriate resources (people, time, and money) to compliance efforts and ultimately help ensure the reliability of information submitted to the Agency.

Accordingly, we urge EPA to:

- Finalize revisions to the reporting requirements that improve the effectiveness, implementability, and practicality of the reporting program, including but not limited to, appropriate alignment with longstanding TSCA reporting concepts and retain the proposed exemptions for PFAS manufactured (including imported) in mixtures or products at concentrations 0.1% or lower; imported articles; certain byproducts; impurities; research and development chemicals; and non-isolated intermediates in the final rule;
- Make the reporting platform publicly available sufficiently in advance of the submission period to allow companies to familiarize themselves with the reporting submission layout, expectations, and system functionality;
- Complete additional testing of the reporting platform sufficiently in advance of the reporting period to help ensure that the platform functions as intended and that glitches can be corrected prior to the start of the reporting period;
- Publish comprehensive implementation guidance sufficiently in advance of the reporting period, including guidance addressing the submission of health and safety studies, IUCLID and OECD Harmonized Template requirements, confidential business information claims, and other key reporting matters;
- Provide no less than six months following the publication of the final rule before the start of the submission period to allow EPA to complete its implementation process and for regulated entities to align their data in a way that complies with updated reporting requirements; and
- Finalize a reporting submission period that includes no less than six months for companies to comply with this reporting obligation.

These steps would help regulated entities provide the EPA with accurate, complete, and reliable information while advancing Congress's objective of creating a meaningful body of PFAS data. This would also help regulated entities devote resources toward producing high-quality submissions and supporting consistent compliance outcomes.

We stand ready to engage constructively with EPA to support successful implementation of this important reporting program.

Thank you for your consideration.

Sincerely,

Aerospace Industries Association
Alliance for Automotive Innovation
Alliance for Chemical Distribution (ACD)
American Apparel & Footwear Association

American Chemistry Council
American Coatings Association
American Coke and Coal Chemicals Institute
American Feed Industry Association
American Forest & Paper Association
American Fuel & Petrochemical Manufacturers
American Home Furnishings Alliance (AHFA)
American Sportfishing Association
American Wood Council
Asphalt Roofing Manufacturers Association
Associated Industries of Vermont
Auto Care Association
Battery Council International
BIFMA
Chemical Industry Council of Illinois
Chemical Users Coalition
Communications Cable & Connectivity Association (CCCA)
Composite Panel Association
Compressed Gas Association (CGA)
Consumer Technology Association
Flexible Packaging Association
Florida Tropical Fish Farms Association
Fluid Sealing Association
Forging Industry Association
Fuel Cell & Hydrogen Energy Association
Global Electronics Association
Household & Commercial Products Association
INDA- the Association of the Nonwoven Fabrics Industry
Independent Lubricant Manufacturers Association (ILMA)
Institute of Makers of Explosives
International Sign Association
International Sleep Products Association
Iowa Association of Business and Industry
ISSA, The Association for Cleaning and Facility Solutions
Maryland Chamber of Commerce
MEMA, The Vehicle Suppliers Association
Mississippi Business Alliance
National Association of Manufacturers
National Automatic Merchandising Association (NAMA)
National Council of Textile Organizations (NCTO)
National Electrical Manufacturers Association (NEMA)
National Glass Association
National Mining Association
National Ready Mixed Concrete Association
New Jersey Business & Industry Association
North American Association of Food Equipment Manufacturers (NAFEM)
North Carolina Chamber

Northeast PA Manufacturers & Employers Association
Ohio Chemistry Technology Council
Ohio Manufacturers' Association
Outdoor Power Equipment Institute
Pennsylvania Chemical Industry Council
Pennsylvania Manufacturers' Association
Pet Food Institute
Plastics Industry Association (PLASTICS)
Plumbing Manufacturers International
Polyurethane Manufacturer's Association
Power Tool Institute
PRINTING United Alliance
RadTech International North America
Resilient Floor Covering Institute (RFCI)
Rhode Island Manufacturers Association
RV Industry Association
Society of Chemical Manufacturers & Affiliates (SOCMA)
Spray Polyurethane Foam Alliance
Steel Founders' Society of America
Tennessee Chamber of Commerce & Industry
Textile Care Allied Trades Association
The Association for Hose and Accessories Distribution
The Baby Safety Alliance
The Chlorine Institute
The Complex Products Manufacturers Coalition
The State Chamber of Oklahoma
The Vision Council
TRSA - The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce
U.S. Tire Manufacturers Association
Utility Solid Waste Activities Group
Valve Manufacturers Association