

Approaching Deadline to Request Extension on Canada PFAS Reporting

The deadline is approaching for businesses to report PFAS information—**or request an extension on reporting**—under Canada’s [NOTICE WITH RESPECT TO CERTAIN PER- AND POLYFLUOROALKYL SUBSTANCES \(PFAS\)](#) (the Notice), issued under the Canadian Environmental Protection Act. If, in 2023, your business manufactured or used PFAS in manufacturing in Canada, or imported products into Canada containing PFAS, it may be required to report or request an extension.

Under the Notice, businesses must report to Environment and Climate Change Canada (ECCC) by **January 29, 2025**, detailed information about their use, manufacture and import of PFAS during the 2023 calendar year. If businesses intend to request an extension of time to report, they must do so at least 5 business days prior to the deadline, or **January 22, 2025**.

The purpose of the Notice is to collect information on PFAS substances, either alone or in mixtures, products or manufactured items in Canadian commerce. Schedule 1 of the Notice identifies reportable PFAS substances. The reporting obligation applies to any entity that manufactured or imported PFAS in Canada in 2023, **including as a part of a product**, according to the following criteria:

- Manufactured a total quantity greater than 1000 g of a substance listed in Schedule 1
- Imported a total quantity greater than 10 g of a substance listed in Part 1 of Schedule 1, OR a total quantity greater than 100 kg of a substance listed in Part 2 or Part 3 of Schedule 1, whether the substance was alone, or at a concentration equal to or above 1 ppm in a mixture or in a product or at a concentration equal to or above 1 ppm in one of the categories of manufactured items;
- Imported a total quantity greater than 100 kg of any substance listed in Schedule 1 at a concentration equal to or above 1 ppm in a manufactured item NOT listed in the categories of manufactured items; or
- Used a total quantity greater than 10 g of a substance listed in Schedule 1, whether the substance was alone, or at a concentration equal to or above 1

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ppm in a mixture or in a product, in the manufacture of a mixture, a product or a manufactured item.

The detail to be reported under the Notice includes information such as PFAS identity, volume, concentration and facility location, and requires companies to provide information that the company “possesses or to which [it] may reasonably be expected to have access.” Additional guidance is available in ECCC’s [GUIDANCE MANUAL](#).

Reporting must be done via an online reporting system by January 29, 2025, but requests for extensions may be made any time up to five days before the deadline by email to the ECCC office (January 22, 2025). Requests for additional time to respond to the notice should be submitted in writing to substances@ec.gc.ca and include the organization name, contact information, substance identifier(s) involved, the reason for the request and the duration of time requested.

If you have questions about reporting or requesting an extension under the Notice, please contact Reinhart attorney Guy Temple (gtemple@reinhartlaw.com).

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