



Your Proactive PFAS Compliance Plan

Stay Ahead of PFAS Timelines
& Meet Your Requirements

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Introduction:

PFAS Timelines Are Complicated

Regulatory, stakeholder, and public scrutiny on per- and polyfluoroalkyl substances (PFAS) is higher than it's ever been, resulting in the rollout of new PFAS restrictions and reporting requirements around the globe. In addition to new regulatory pressures, manufacturers face risks like lawsuits, insurance coverage loss, and early product obsolescence. These multidimensional risks, combined with looming regulatory deadline announcements, make planning a compliance calendar complicated.

At the U.S. state level, there is growing momentum to regulate PFAS. States such as Minnesota, Maine, California, New York, and Washington are advancing their own frameworks that require manufacturers to report on PFAS use and, in some cases, phase out these substances in certain products. Meanwhile, federal activity continues with Section 8(a)(7) of the Toxic Substances Control Act (TSCA), further complicating compliance for manufacturers that must track multiple layers of PFAS requirements and deadlines.

This piece will help you understand the steps you'll need to take to achieve deep visibility into PFAS usage in your supply chain, helping you stay compliant with current and forthcoming regulations and mitigate your risk exposure.

Current PFAS Regulations

Traditionally, many PFAS regulations were focused on protecting drinking water or soil from persistent contamination, but the current regulatory trend is to address PFAS use in products, both to prevent additional environmental contamination and to protect human health. For example, Section 8(a)(7) of TSCA includes scoping and reporting requirements for manufacturers using PFAS in their products.¹ These regulations have also expanded from individual PFAS chemicals (e.g., perfluorooctanoic acid [PFOA] or perfluorooctanesulfonic acid [PFOS]) to an entire substance “family” approach. As a substance family,

¹ Regulations.gov. (2021, June 28). *Toxic Substances Control Act Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances*. <https://www.regulations.gov/document/EPA-HQ-OPPT-2020-0549-0001>



some PFAS are already regulated under existing legislation, such as Annex 17 of the EU Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) Regulation; the Canadian Environmental Protection Act (CEPA); and others.

These different jurisdictions define what PFAS are and how they're regulated in different ways. For example, the Organisation for Economic Co-operation and Development (OECD) defines PFAS as any substance that contains at least one fully fluorinated carbon, and this framework is used to regulate PFAS in the EU. In the U.S., however, the EPA has identified specific, more complex multi-carbon fluorinated structures and has provided a list of over 12,000 PFAS substances companies must declare against.²

Given these differences, companies have a broad range of substances to cover. Proactive data strategies help manage them, and prepare for future requirements to protect against risk from expanding regulations which increasingly address the whole family. This avoids the introduction of "regrettable substitutions." Manufacturers need a product compliance program and solution that is prepared to meet their existing PFAS requirements today, and adapt to changing regulations in the future.

² United States Environmental Protection Agency. (n.d.). Master List of PFAS Substances. <https://comptox.epa.gov/dashboard/chemical-lists/pfasmaster>

Multidimensional PFAS Risks

Legal Liability

Your organization isn't just at risk for regulatory non-compliance. The intense scrutiny of PFAS is also linked to a rise in lawsuits against manufacturers producing and using PFAS chemicals. For example, in recent settlement agreements, 3M has agreed to pay out over \$10 billion USD in PFAS-related settlements with water utilities, and Chemours, DuPont, and Corteva agreed to pay \$1.19 billion USD to fund PFAS removal from public drinking water.³

Insurance Coverage Loss

In the face of growing litigation, insurers are concerned about future financial obligations that may arise from the manufacture of PFAS, or simply the use in manufacturing processes and products. Many insurers are asking their customers to reexamine their use of PFAS, with some even preemptively suing their clients, hoping judges will rule that their policies don't cover PFAS litigation.

Product Obsolescence

Some of the world's leading chemical manufacturers are ceasing their PFAS production, will create early and unplanned obsolescence risks for businesses that rely on their products. For example, as of December 2025, 3M ceased manufacture of PFAS, and continues to phase these substances out of its portfolio, impacting more than 22,000 of its products.⁴ Ongoing investor pressure on chemical manufacturers means many others are likely to follow suit, making it more difficult to get parts for repair and upkeep, and rendering stock non-compliant.⁵

³ New York Times. (2023, June 22). *3M Reaches \$10.3 Billion Settlement in 'Forever Chemicals' Suits*. <https://www.nytimes.com/2023/06/22/business/3m-settlement-forever-chemicals-lawsuit.html>

⁴ Kennedy, P. (2026, January 22). *3M ends PFAS manufacturing on schedule*. Minnesota Star-Tribune. <https://www.startribune.com/3m-end-pfas-manufacturing-by-2025-meet-deadline-forever-chemical/601568159>

⁵ The Guardian. (2023, January 6). *Investors pressure top firms to halt production of toxic 'forever chemicals'*. <https://www.theguardian.com/environment/2023/jan/06/pfas-toxic-forever-chemicals-manufacturers>



Proactive Work Plan:

Five Steps to Compliance

Staying updated on product compliance is a full-time job, made even more challenging by the rapid pace of new PFAS requirements that many manufacturers find overwhelming. That's why we're giving you an action plan with essential steps to start following now.

Click on the checkboxes to mark complete as you complete each step ✨

STEP ONE

Identify PFAS Risks

☐

Audit existing procurement records for suppliers known to sell PFAS materials or for commodities with a higher risk of containing PFAS, such as flame retardants or non-stick coatings

☐

Evaluate the chemicals present in your manufacturing operations that are at high risk for PFAS, such as electroplating

☐

Audit equipment used in your facility operations, including maintenance, repair, or operations (MRO) processes, to see if anything you purchase includes PFAS. Common examples include o-rings, gaskets, and non-reactive lubricants

STEP TWO

Engage Suppliers

Note: Be aware that even a full material disclosure (FMD) or Safety Data Sheet from a supplier can hide PFAS. FMDs often omit a certain percentage of components to produce confidential and proprietary information, and PFAS are not often disclosed in Safety Data Sheets.

☐

Survey your suppliers about PFAS in the materials and parts you purchase. They may need to reach out to their own suppliers for information, extending the timeline even further. Also, be aware that some suppliers may be discontinuing products to avoid PFAS non-compliance

☐

Educate suppliers about PFAS, the regulations and risks associated with it, and how they can identify and report on PFAS

☐

Send suppliers a standardized survey to collect product composition data, including the amount of PFAS in each part and what their function is, as this info is required for reporting

☐

Validate data submissions



STEP THREE

Create a Strategy

When suppliers report that PFAS are in your purchased parts and materials, you'll next need to determine if it is necessary to redesign processes or products:

- Are your product sales at risk due to regulation, insurance, or customer pressure?
- Do you have maintenance contracts that rely on replacement parts containing PFAS?
- Are the materials or parts at risk of obsolescence from the original manufacturer?
- Do you have sustainability goals that include eliminating the use of PFAS and other persistent and toxic chemicals?

If a redesign is required, determine if:



Compliant alternatives are available (also consider availability, cost, and supplier compliance risks)



Your products using those parts will require re-engineering, retesting, and recertification



Any products need to be phased out from your catalog



MRO processes or equipment need to be replaced, and plan last-time buys of required materials



Document your plan, and communicate it to leadership and your suppliers



Don't fall into the trap of regrettable replacements; make sure the substances you're using to replace any restricted substances are not going to be restricted in the near future.



STEP FOUR

New Product Development, Testing & Recertification

Depending on the number of products you need to re-engineer, re-test, and re-certify, and the complexity of your product's design, this process can take months or even years to fully complete.



Conduct performance tests of new parts and redesigned products with the alternate substance(s) to ensure they meet quality, performance, and safety requirements



Requalify products for each market where they're sold, including recertification along with literature and label updates



Plan for inventory management of existing PFAS-containing parts and products in stock



If PFAS cannot be removed from products, assess if your usage meets exemption criteria and be prepared to meet reporting requirements

STEP FIVE

Document Compliance

There are other legal requirements emerging around the use of PFAS. While some reporting requirements are already known (especially for U.S. states), many others are still in development. It's important to focus your efforts on collecting supply chain data, including the concentration and function of PFAS, and having it organized for easier reporting. This will save you time when reporting is required and allows you to respond to customer inquiries more efficiently.



Centralize your part and supply chain data in one system



Evaluate products at the part level using data collected in bills of material (BOMs)



Create product reports and declarations that demonstrate products are PFAS-free and/or declare which PFAS are used



Generate and submit compliance reports to authorities following published requirements (as applicable)



Notify customers



Notify insurance providers



Add compliance declarations to your corporate website, sustainability report, and other applicable communications



Assent:

Your Solution to PFAS Compliance

Your PFAS compliance plan is only as good as the systems you have in place to support it. Manual supplier outreach, data collection, and reporting are error-prone and costly processes. "Shortcuts," like matching supplier data to your complex product BOMs, are nearly impossible. Assent's PFAS solution makes it easier to follow PFAS data collection best practices, enhancing your program to make it more proactive and cost-effective.



Benefits



Automates supplier outreach using standardized surveys to capture all the PFAS data you need, reducing manual effort and improving data quality.



Centralizes and rolls up PFAS supply chain data into reports and declarations to rapidly satisfy customer and regulator requests.



Protects you from rapidly changing PFAS requirements by ensuring your questionnaires and reporting meet current PFAS requirements.



Creates a transparent audit trail to build stakeholder trust in your due diligence.



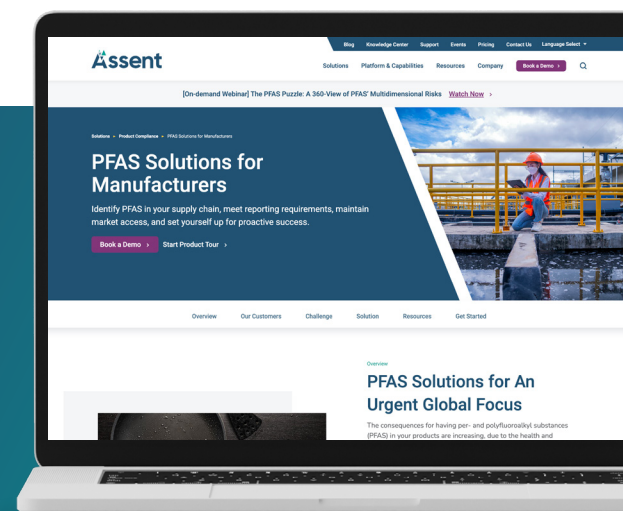
Supports the full TSCA PFAS list from the June 2021 reporting proposal for maximum coverage and protection.



Provides peace of mind with support from a team of subject matter experts able to provide insights and understanding of new and evolving regulations.

Learn more about Assent's comprehensive **TSCA PFAS solution here**, then schedule a live demo.

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Conclusion:

Act Now Before It's Too Late

PFAS requirements are evolving at a record pace, and you can't afford to wait.

Collecting PFAS data from your supply chain can take a long time, and your suppliers may need to cascade data requests upstream, extending your wait time even further. If you do find PFAS in your parts or in use at your facility, you'll need to budget time for contingency planning and remediation. Depending on how reliant you are on PFAS in your parts and products, compliance could take months or even years.

The longer you wait to collect PFAS data from your suppliers, the more you're putting yourself at risk. Demand for compliant parts will increase, and your competitors who are ahead of the game will gain an edge in the market. But when you take a proactive approach, you'll meet changing obligations, navigate business pressures, and be prepared for new and emerging PFAS risks.

Assent gives you a complete solution for PFAS due diligence and the support of our team of product compliance and regulatory experts. We help you collect PFAS data and more efficiently demonstrate product compliance, saving you time and keeping you ahead of complex, evolving PFAS requirements.



Get in touch with Assent to
start your proactive PFAS program:
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