

2024 Chemical Data Reporting Deadline Extended by EPA

Article By:

Ryan J. Carra

Mark N. Duvall

Robert T. Denney

The U.S. Environmental Protecting Agency (EPA) is amending the Toxic Substances Control Act (TSCA) Chemical Data Reporting (CDR) regulations to extend the September 30, 2024 submission deadline for 2024 reports to **November 22, 2024**. EPA explained that this extension is in response to technical issues with the 2024 CDR data submission tool, and the amendment is being released as a [final rule](#) that will be effective as of the date of publication.

Background on CDR

The CDR regulations require manufacturers (including importers) of certain chemical substances included on the TSCA Chemical Substance Inventory to report data on the manufacturing, processing, and use of those chemical substances. Reporting is to be done every four years electronically using EPA's Central Data Exchange (CDX) system and the e-CDRweb reporting tool. The current 2024 CDR submission period is from June 1 to September 30, 2024, though that submission period is now being extended to November 22, 2024. Subsequent submission periods (the next being in 2028) are not being amended.

EPA's Justification for the Extended Reporting Period

EPA is extending the reporting period due to technical issues with the CDR data submission tool, as explained in an EPA [announcement](#):

EPA is extending the submission deadline in response to recent concerns related to the 2024 reporting tool and technical issues with the ability of the reporting tool to correctly capture substantiations for chemical identity confidential business information (CBI) claims across multiple chemicals. When the copy function in the reporting tool is used, some of the questions and their responses are not copied and are not included with the submission. The reporting tool also prevents a user from adding the missing information if the copy function was used. EPA anticipates that the reporting tool will be working properly by the end of September. This issue only affects submissions with multiple CBI claims. As of now, approximately 29 submissions involve at least one CBI claim for

a chemical identity. EPA has not yet confirmed how many of these 29 submissions involve more than one chemical identity being claimed as CBI. This extension only applies to the 2024 submission period.

Commentary

EPA's extension of the 2024 CDR deadline comes on the heels of an 8-month delay to the submission window for reporting under the TSCA section 8(a)(7) rule for perfluoroalkyl and polyfluoroalkyl substances (PFAS), as discussed in our [alert](#) on that topic. To justify that 8-month delay, EPA explained that the agency is experiencing resource constraints on the timely development and testing of the PFAS reporting software. Earlier this year, EPA likewise [delayed](#) the deadline for reporting under the TSCA section 8(a)(1) rule for asbestos by about a month due to technical issues with the reporting application that were subsequently fixed. Furthermore, EPA [extended](#) the 2020 CDR deadline twice for a total of four months for several reasons, including problems submitters were experiencing with the CDX system. EPA's latest extension of the 2024 CDR deadline highlights how technical issues with electronic reporting tools have impacted multiple TSCA reporting programs.

© 2025 Beveridge & Diamond PC

National Law Review, Volume XIV, Number 293

Source URL: <https://natlawreview.com/article/2024-chemical-data-reporting-deadline-extended-epa>