



June 12, 2025

Submitted through <https://www.regulations.gov>

Mr. David Turk  
Data Gathering, Management, and Policy Division (7406M)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460-0001

RE: Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Data Reporting and Recordkeeping Under the Toxic Substances Control Act (TSCA); Change to Submission Period, EPA-HQ-OPPT-2020-0549

Dear Mr. Turk:

The Alliance for Automotive Innovation (Auto Innovators)<sup>1</sup> appreciates the opportunity to provide comments on EPA's interim final rule "Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Data Reporting and Recordkeeping Under the Toxic Substances Control Act (TSCA); Change to Submission Period."<sup>2</sup>

Auto Innovators represents the auto manufacturing sector, including automakers that produce and sell more than 90% of the new light-duty vehicles in the United States. Our mission is to work with policymakers to realize a future of cleaner, safer, and smarter personal transportation and to work together on policies that further these goals, increase U.S. competitiveness, and ensure sustainable, well-paying jobs for citizens throughout the country.

We understand that EPA is issuing this interim final rule to change the data submission period for the TSCA section 8(a)(7) PFAS reporting rule<sup>3</sup> by changing the submission period start date to April 13, 2026 and the end date to October 13, 2026 for most reporters.

We would like to offer our strong support for this necessary action and appreciate that EPA recognizes the importance of having an appropriate and beta-tested reporting application ready to collect the data that will ultimately be required to be submitted. Auto Innovators reiterates our strong interest in continuing to work on that effort with EPA staff. We also appreciate and support the Agency's indication that it may reopen portions of the rule to comment in a separate rulemaking regarding potential modifications.

Sincerely,

A handwritten signature in blue ink that reads "Catherine Palin".

Catherine Palin  
Alliance for Automotive Innovation

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<sup>1</sup> Auto Innovators represents the full automotive industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive automotive industry that supports U.S. economic and national security. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector. [www.autosinnovate.org](http://www.autosinnovate.org).

<sup>2</sup> 90 Fed. Reg. 20,236 (May 13, 2025).

<sup>3</sup> 40 C.F.R. Part 705.