

## CANADIAN PFAS REPORTING REQUIREMENTS

### What is PFAS?

Per- and Polyfluoroalkyl Substances (PFAS), also known as 'forever chemicals,' are man-made chemicals found in various products due to their resistance to water, oil, and heat. PFAS are used in items relevant to the RV industry, such as textiles, carpets, and fabric treatments. However, their environmental persistence and health risks have led to increasingly strict regulations across several countries, including Canada.

### Canada's PFAS Reporting Requirements

In Canada, [PFAS reporting requirements were introduced under the Canadian Environmental Protection Act \(CEPA\)](#). Any entity involved in manufacturing in Canada, importing into Canada, or using PFAS listed in [Schedule 1](#) during the 2023 calendar year must submit a report by January 29, 2025.

Specifically, reporting is mandatory for those who in 2023 met the following thresholds:

- Manufactured (in Canada) more than 1,000 grams of listed PFAS.
- Imported into Canada more than 10 grams of certain listed PFAS in Part 1, or more than 100 kilograms in Part 2 or Part 3.
- Used (in Canada) more than 10 grams of listed PFAS in a manufacturing process.

The report must disclose quantities, uses, and safety measures related to the PFAS substances, including whether PFAS are present in products such as textiles, children's goods, and food contact materials.

### How to Report

Reports must be submitted through Environment and Climate Change [Canada's Single Window online system](#). The information required includes the quantities of PFAS manufactured, imported, used, or exported, and details on their specific applications. In cases where companies are unable to meet the deadline, they may request an extension from the Minister of the Environment before January 29, 2025. If your company is a foreign supplier that manufactures products containing PFAS, you should inform your Canadian importer that they import a reportable substance and may meet the reporting criteria of the notice.

## **Penalties for Non-Compliance**

Non-compliance with PFAS reporting requirements can result in substantial penalties of up to \$500,000 for first offenses, and up to \$1,000,000 for subsequent violations. Directors and officers of a company may also be personally liable if they were aware of the reporting obligation but failed to ensure compliance.

## **Impact on the RV Industry**

For the RV industry, these regulations pose new challenges in terms of supply chain transparency and compliance. RV manufacturers, importers, and suppliers must assess whether their products contain PFAS, whether they are the importer or foreign supplier, and ensure proper reporting for any items imported or used in the Canadian market. Failure to comply may result in fines, disruption of supply chains, and potential legal liabilities. Additionally, RV components such as textiles, carpets, and upholstery may be subject to these regulations if PFAS are present, further complicating compliance efforts.