

PFAS regulatory update for North America: Canada's New Requirements and US EPA TSCA 8(a)(7)

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This session will be recorded.

DXC at a glance

\$13.7B

FY24 revenue

60+

years of innovation delivering mission-critical systems for customers

125,000+

employees worldwide

70+

countries

200+

partner ecosystem with best-of-breed partners

200

customers in the Fortune 500

AA

rating from MSCI for outstanding ESG performance ([disclaimer](#))

#294

in the 2024 Fortune 500

Environmental, social and governance performance

Environmental

Advancing the sustainability of our operations and IT services while assisting our customers to become more sustainable

- ✓ The SBTi has approved DXC's near-term science-based emissions reduction target to reduce Scope 1 and 2 emissions by 65% by FY30 against our FY19 baseline
- ✓ 58% reduction in Scope 1 & 2 greenhouse gas emissions in FY23 from FY19 baseline, exceeding our FY22 target
- ✓ 44% reduction in energy consumption in FY23 from FY19 baseline
- ✓ 38% of electricity procured from renewable sources
- ✓ Recycled 99% of e-waste processed via recycling/refurbishment partners

Recognized by Newsweek as one of America's Greatest Workplaces for 2024



Named to Newsweek's list of America's Most Responsible Companies 2024 for environmental, social and corporate governance performance

Social

Building a diverse, inclusive, value-based, and people-first culture based on equitable practices, employee perspectives and community stewardship

- ✓ Established 20 Employee Resource Groups to cultivate diversity
- ✓ Partnering with diversity groups to increase diverse hiring
- ✓ Launched global career development programs for women
- ✓ Improved inclusivity of employee benefits offerings
- ✓ Employees completed 4.7M training hours via DXC Learning
- ✓ In FY23 donated \$6M to more than 1,000 global causes
- ✓ Launched global ESG Community Outreach network



Awarded a silver medal by EcoVadis in 2024 for outstanding sustainability performance

Achieved a top score of 100 in the 2023 Disability Equality Index



Awarded Prime status by ISS ESG to recognize DXC for fulfilling ambitious absolute performance requirements

Governance

Instilling trust and garnering respect among the stakeholders we serve through transparent leadership, to drive sustainable growth

- ✓ Experienced and engaged Board of Directors and key committees under the leadership of an independent Chair
- ✓ 41% of Board members from underrepresented social groups and 25% of Board members are female
- ✓ Robust ethics program with proactive audit and risk assessments
- ✓ Continual investment in information security and data privacy to aggressively maintain best-in-class assurances



DXC discloses its ESG performance in alignment with preferred ESG frameworks, including SASB, TCFD, CDP and GRI, and in adhering to their principles. UN Global Compact Signatory since 2017.

CDX at-a-glance

In Business since 2011

DXC leveraged the lessons learned while providing IMDS to create CDX

30,000+

Chemical Abstract System (CAS) substances found in common products

10,000+

Of standard metals with compositions and norms

Compliance & Privacy Certifications

- ISO 9001 Quality Management
- ISO/IEC 27001 Information Security Management
- ISO 50001 Energy Management
- SOC1 & SOC2
- TiSAX

Memberships

CDX is an active member and partner of several international associations, where we work closely with various industry players to ensure the best use of our products.



11.6k+

Companies
registered

40.3k+

Active users

~1MM

Material
Declaration
Sheets (MDSs)

50.5k+

Conflict Minerals
Declarations
(CMDs)

Enhance compliance by
streamlining data and reducing
manual effort



Speaker Introduction

Monika E. Kotkowska

Senior CDX Consultant / Regulatory Product Compliance Expert

Monika.Kotkowska@dxc.com

[LinkedIn profile](#)

- Specializes in Regulatory Product Compliance, ESG, and Chemical Management Solutions.
- Certified Agile and PRINCE Project Manager.
- Currently pursuing a Master of Business Administration (MBA) with a focus on ESG topics
- Holds a Master's degree in Chemistry and Engineering from the University of Technology in Wroclaw, Poland.
- Over a decade of experience in diverse regulatory RA.
- Actively involved in IAEG, AIAG, and more recently, AEM.
- Outside of work, a true travel backpacker at heart.



Speaker Introduction

Will Martin

Managing Director of EPR Consulting Ltd

Will.Martin@epr-consulting.co.uk

[Linkedin profile](#)

- Provider of Chemical Service to DXC Technology, managing substance & regulatory updates in IMDS & CDX
- DXC Training partner for UK
- Consultant to ACEA supporting Substance Impact Assessment Process (SIAP), and GADSL processes
- Member of Institute of Environmental Assessment and Management (IEMA)
- Developed software and data to support M&P compliance and risk assessments, integrated with product development for aerospace companies



Speaker Introduction

Chuck LePard

Executive Consultant, IMDS & CDX Americas Representative

Chuck.Lepard@dxc.com

[LinkedIn Profile](#)

- Degrees in Electrical & Computer Engineering and Computer Science
- Honorable Discharge, United States Navy
- 39+ Years EDS/General Motors/Hewlett Packard/HPE / EntServ / DXC
- Decades of plant floor and engineering experience in related areas
- Advisor to multiple manufacturing industry groups
 - Automotive Industry Action Group, International Aerospace Environmental Group,
 - Association of Equipment Manufacturers, Responsible Materials Initiative
- Leader in Standards Development organizations
 - American National Standards Institute (ANSI), International Standards Organization (ISO) Technical Committee TC-111 on Environmental Sustainability Data Exchange
 - IPC 2-18 175x family for Product Declaration and Compliance reporting



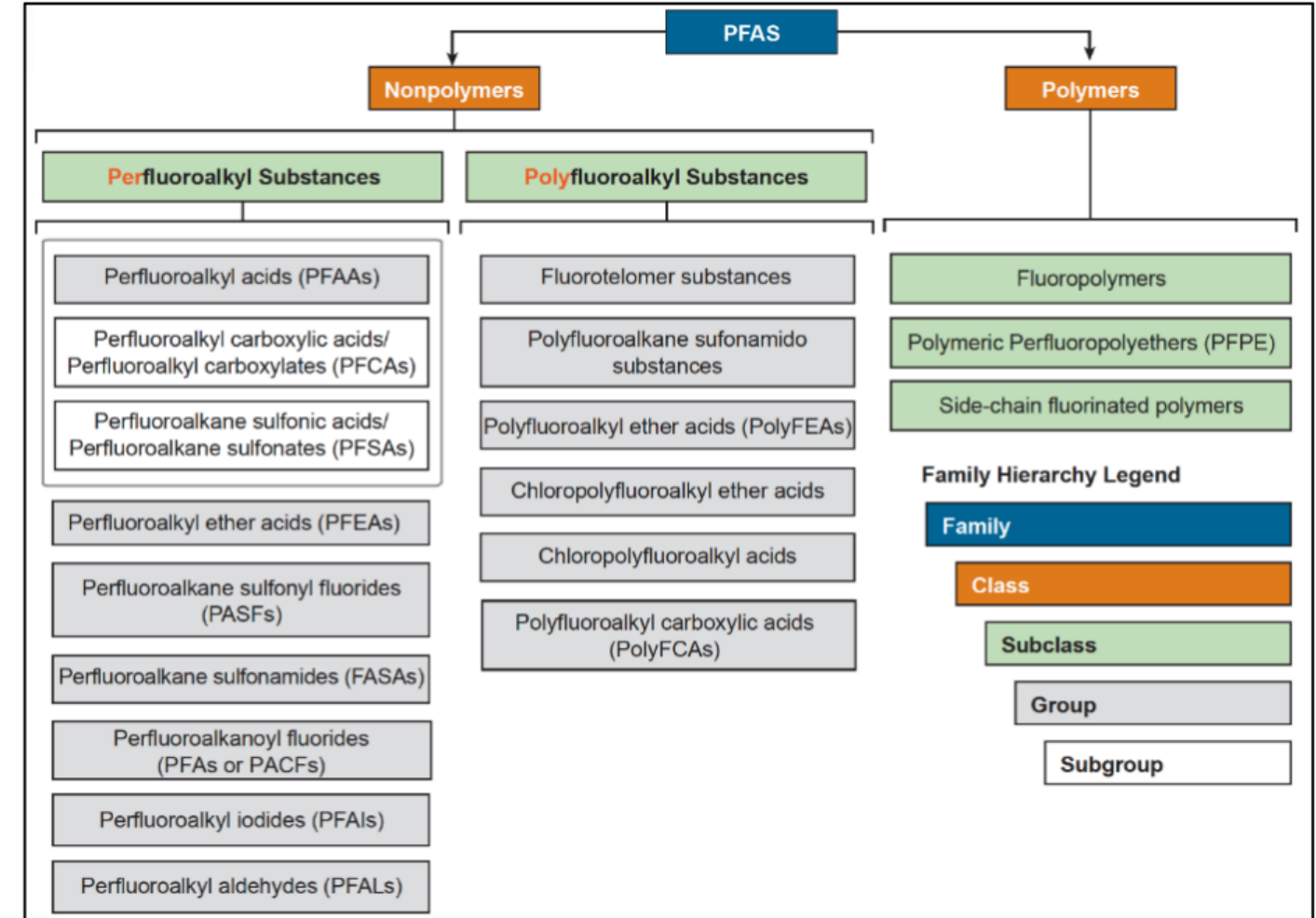
Agenda

- 1 Overview of PFAS and their significance
- 2 PFAS Global Regulatory Landscape & Timeline
- 3 TSCA Section 8(a)(7) PFAS recap
- 4 Canada Reporting Requirements
- 5 Reporting & Submission Process Overview
- 6 Live demonstration of the CDX System
- 7 Interactive Q&A session with our expert panel



“Forever chemicals” – Definitional Complexities

- **Extensive Family of Chemicals:** PFAS are a large family of more than 10,000 synthetic chemicals.
- **Chemical Diversity:** PFAS are chemically diverse, with variations in chain length, functional groups, and molecular structure [1].
- **Regulatory Challenges:** Different regulatory bodies and scientific organizations may adopt varying criteria for what constitutes a PFAS, leading to inconsistencies in definitions [2].
 - EU REACH Restriction Proposal aligned with OECD
 - U.S. TSCA Reporting Rule (structural definition)
 - State of Maine Reporting & Restriction Rule (at least one fully fluorinated carbon atom)
 - UK Regulatory Management Options Analysis (RMOA) (to or more contiguous perfluorinated methylene groups)
- **Industry Influence:** The definition of PFAS can have significant regulatory and economic implications.



[Source: Naming Conventions for Per- and Polyfluoroalkyl Substances \(PFAS\);](#)
The Interstate Technology & Regulatory Council (ITRC); Sep 2023.

PFAS: Double-Edged Sword of Chemistry

The Paradox: The same properties that make PFAS incredibly useful – their stability and durability – also make them persistent environmental pollutants.

Unique Properties

- Exceptional chemical & thermal stability
- Water and oil repellency
- Durability & resistance to degradation
- Non-stick and stain-resistant

Health Implications

- Potential links to cancer
- Hormonal disruption
- Immune system effects
- Developmental issues in children
- Liver and kidney damage



Lifecycle and Contamination

- Raw Material Extraction
- Fluorinated Polymer Production
- Product Manufacturing
- Product Use
- Waste Management

Environmental Concerns

- Bioaccumulation in living organisms
- Long-lasting presence in soil and water
- Potential health risks to humans and wildlife
- Challenging to remove from the environment

PFAS Applications in Automotive Components

Lubricants (Fluoropolymer)

- ESP systems
- Chain guides in automotive engines
- Combustion engines
- Electrical components in brake systems
- Bearings and throttle sensors
- General lubrication applications
- Weather strips
- Electric and thermal protection of connectors in electronic systems

Corrosion inhibitor (Monomeric PFAS: PFOS, PFOA, PFHxS)

- Protect electrodes from aggressive electrolytes and achieve corrosion inhibition.
- Coating for separator film in Li-Ion batteries



Fire-resistant, oleo- & hydro- phobic Coatings (Fluoropolymer & Monomeric PFAS: PFOA, PFOS, FTOHs)

- Aerosol spray paints and other paint coatings
- UV-stable coatings
- Cables and wire & cable insulation
- Coating of diesel & gasoline particle filter hoses
- High abrasion resistance in brake pads
- Coating of insulation materials
- O-Rings and other gaskets & seals

Tyres

(Fluoropolymer)

- Non-stick coating in manufacturing process

Heat exchange system fluid/gases F-Gases such as Freon

Engine Cooling / Radiator systems
Cabin Air Conditioning

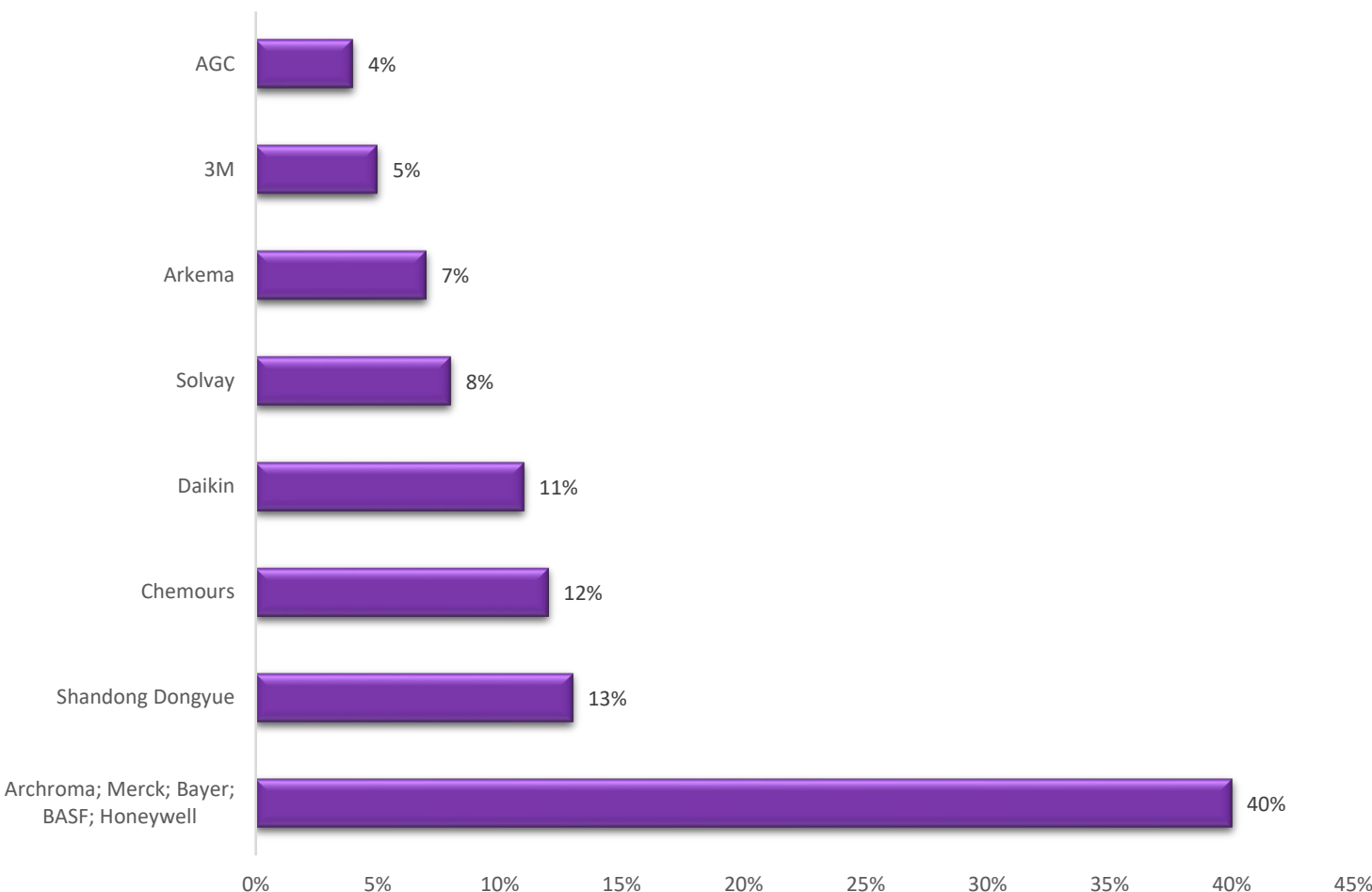
Electronics & Fluidics (Fluoropolymer)

- Membranes
- Hoses
- Seals

Global PFAS Production: Key Players and Initiatives

Twelve chemical companies are responsible for the majority of the global PFAS production [\[3\]](#).

Global Fluoropolymers Production



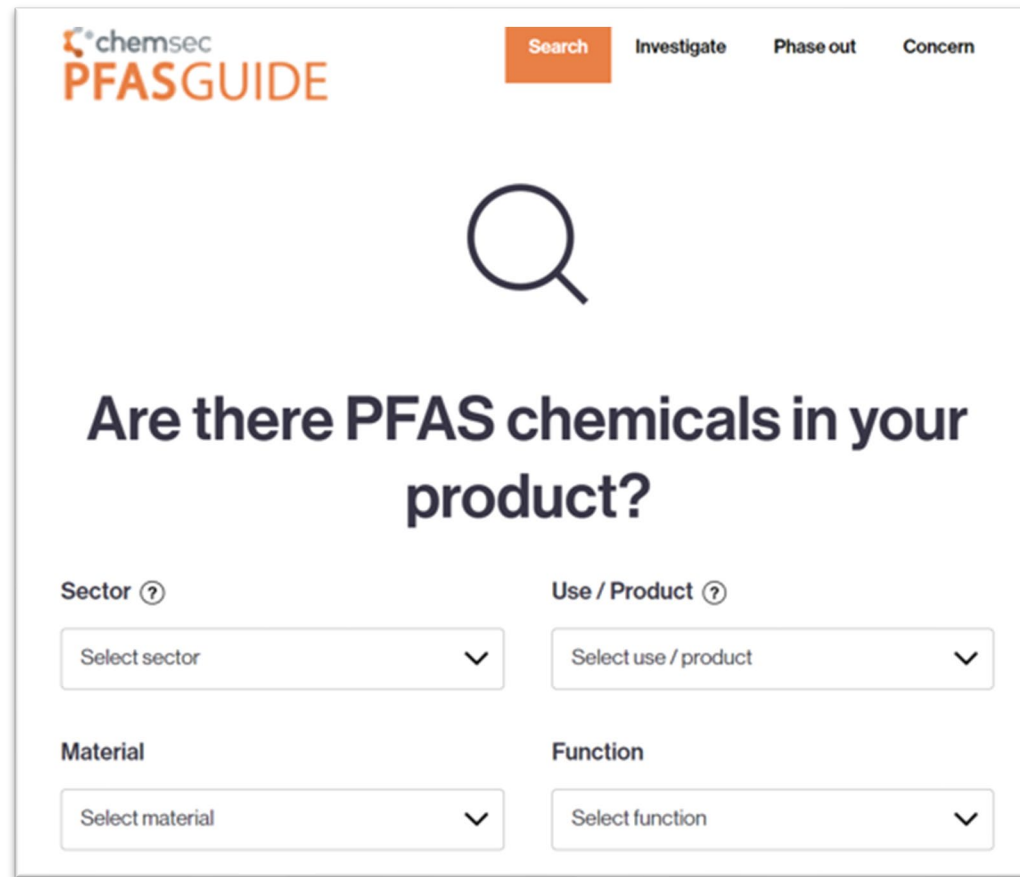
Progress in PFAS Phase-Out by Major Manufacturers

1. **3M:** Targets a global halt in PFAS-related product manufacturing by 2025 and production was down 20% in 2023 [\[1\]](#).
2. **Arkema:** Eliminated long-chain PFAS processing aids; transitioning to non-PFAS surfactants by 2024 [\[2\]](#).
3. **Chemours:** Dedicates to fluorine chemistry innovation, pledging a 99% cut in fluorinated organic compound emissions, with a 40% reduction achieved by 2021 [\[2\]](#).
4. **Solvay:** Commits to phasing out fluorinated surfactants by 2026 [\[2\]](#).

Uncover the presence of PFAS with online resources

ChemSec's PFAS Guide

serves as a starting point for **identifying common applications** within various industries/sectors and **provides potential alternatives** for some of these applications.



The screenshot shows the ChemSec PFAS Guide website. At the top, there is a navigation bar with the ChemSec logo and the text 'PFASGUIDE'. Below the navigation bar, there is a large magnifying glass icon. The main heading reads 'Are there PFAS chemicals in your product?'. Below this heading, there are four dropdown menus arranged in a 2x2 grid. The first two are labeled 'Sector' and 'Use / Product', and the last two are labeled 'Material' and 'Function'. Each dropdown menu has a placeholder text 'Select sector', 'Select use / product', 'Select material', and 'Select function' respectively. The website has a clean, white background with orange and grey accents.

REACH Annex XV

Universal PFAS Restriction



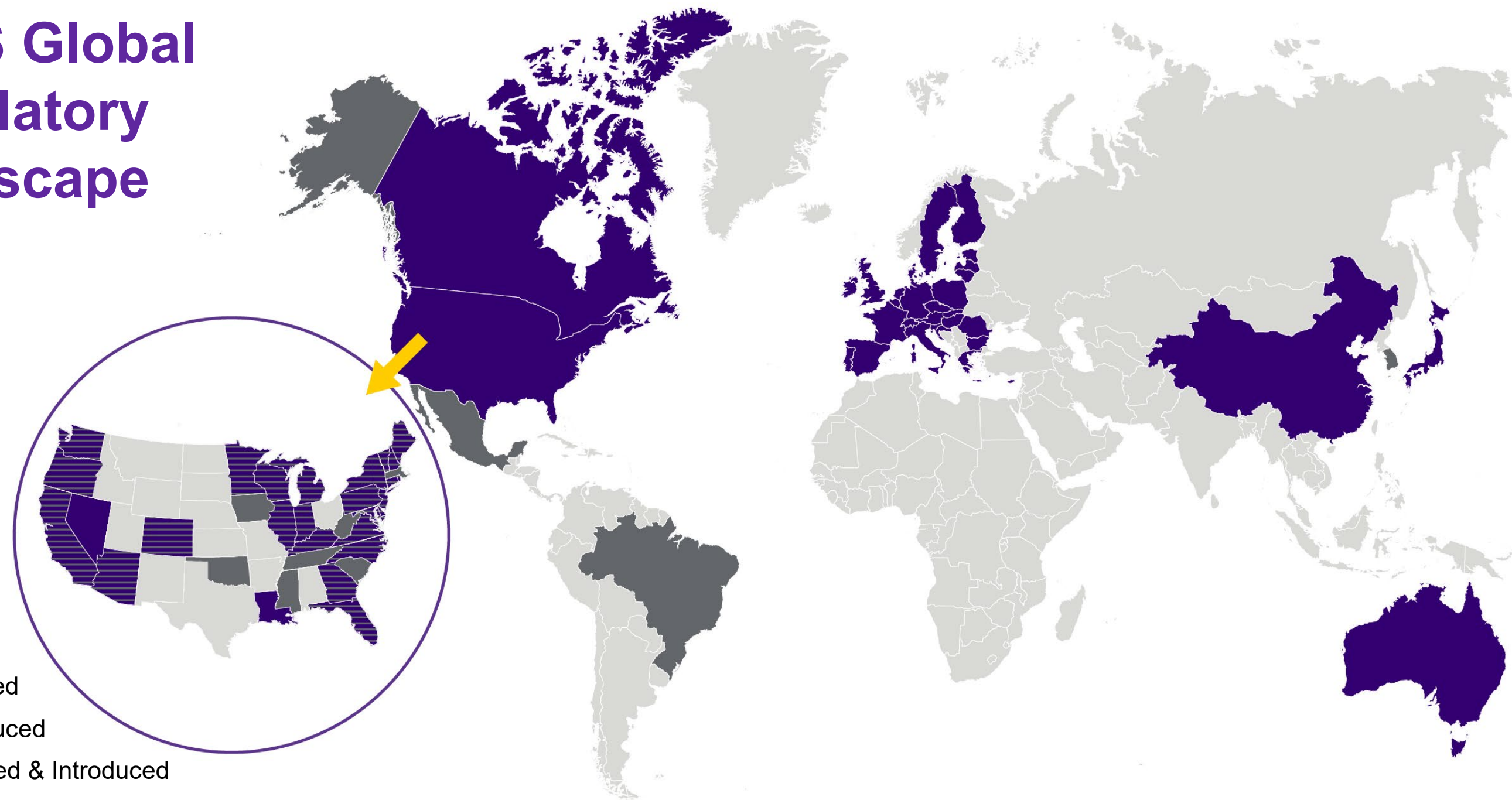
ZeroPM Alternative Assessment Database

is an excel database to identify all types of alternatives to PMT substances and PFAS. Funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No 101036756.

For each use category:

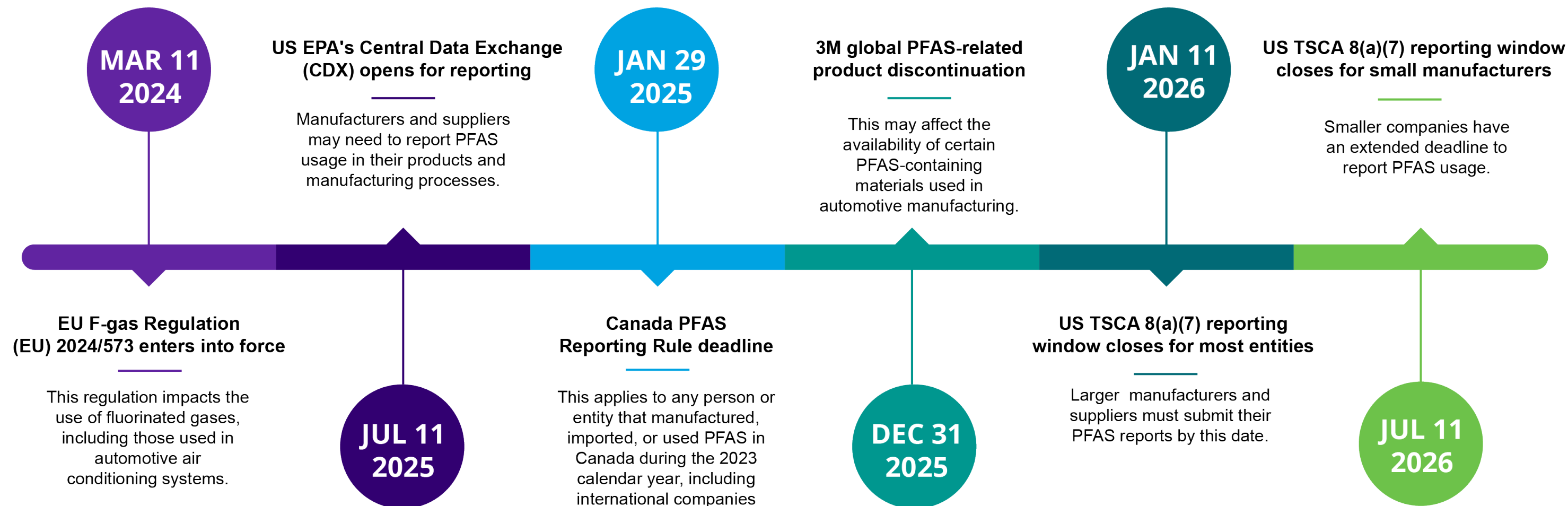
- List of sub-use(s) and application(s) of PFAS
- List of PFAS identified
- Non-exhaustive list of potential alternatives

PFAS Global Regulatory Landscape

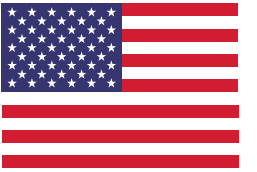


- Adopted
- Introduced
- Adopted & Introduced

Key Dates



TSCA Section 8(a)(7) PFAS Reporting & Recordkeeping



Overview

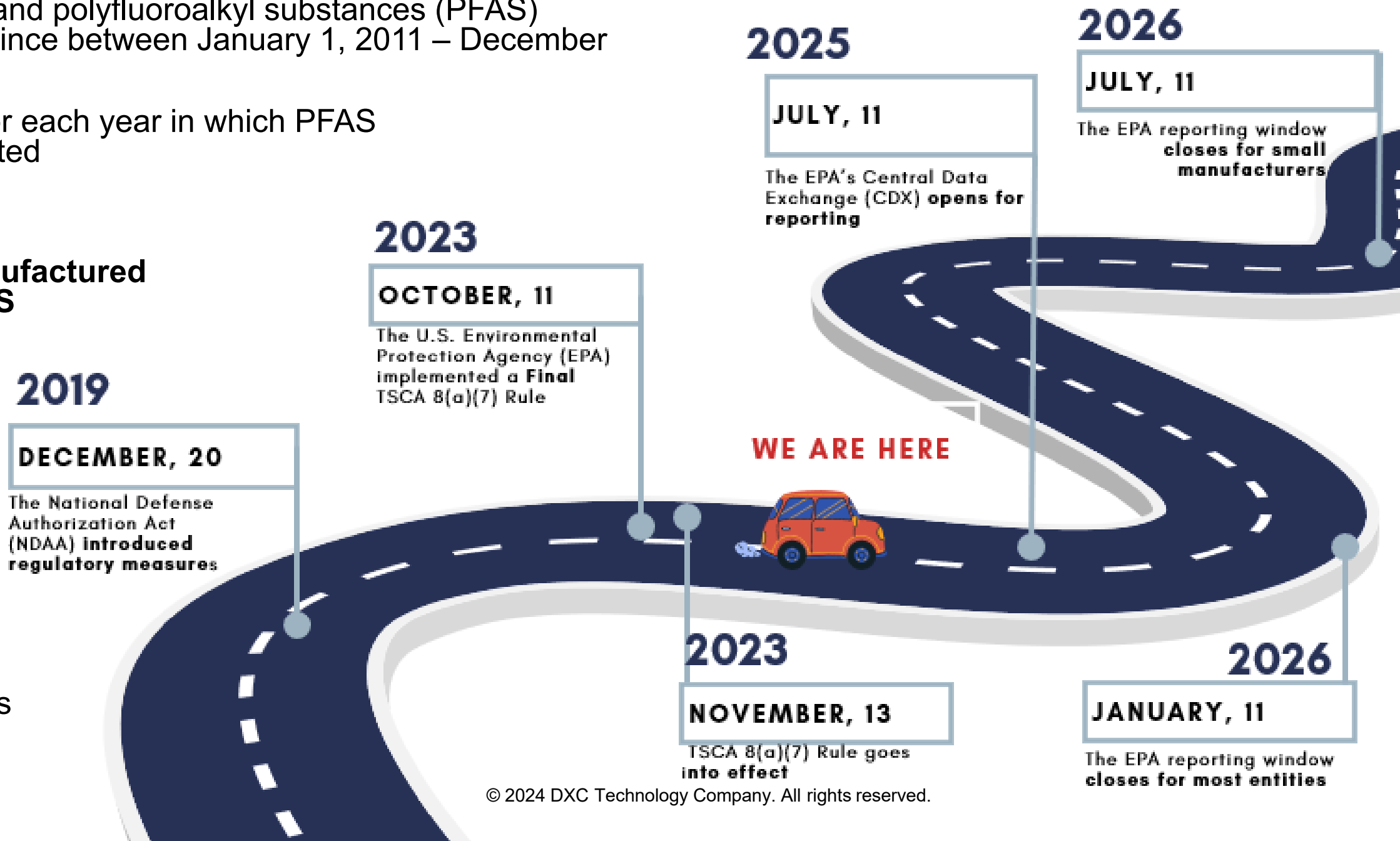
- Requires reporting on per- and polyfluoroalkyl substances (PFAS) manufactured or imported since between January 1, 2011 – December 31, 2022
- Rule requires information for each year in which PFAS was manufactured or imported

Who Must Report:

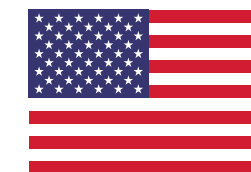
- Any person who has manufactured (including imported) PFAS for commercial purposes
- Includes manufacturers of any amount - **no de minimis exemption**

What to Report:

- PFAS uses, production volumes disposal methods
- Information on byproducts, exposures, and environmental/health effects



TSCA Section 8(a)(7) PFAS Reporting & Recordkeeping



Structural definition of PFAS, at least one of these three structures:

$R-(CF_2)-CF(R')R''$, featuring saturated carbons in both the CF_2 and CF moieties;

$R-CF_2OCF_2-R'$, where R and R' can be F , O , or saturated carbons;

$CF_3C(CF_3)R'R''$, where R' and R'' can be F or saturated carbons.

Fluoropolymers may meet this scope!

There is **no discrete list of individual** PFAS subject to the reporting rule.

EPA has identified at least 1,224 PFAS under the structural definition:

All PFAS listed as active on the February 2023 TSCA Inventory

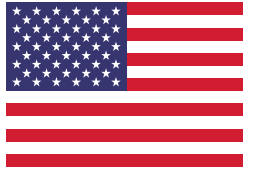
All PFAS with TSCA section 5 (new chemicals) low-volume exemption (LVE) claims

CompTox Chemicals Dashboard -12,154 [substances](#)

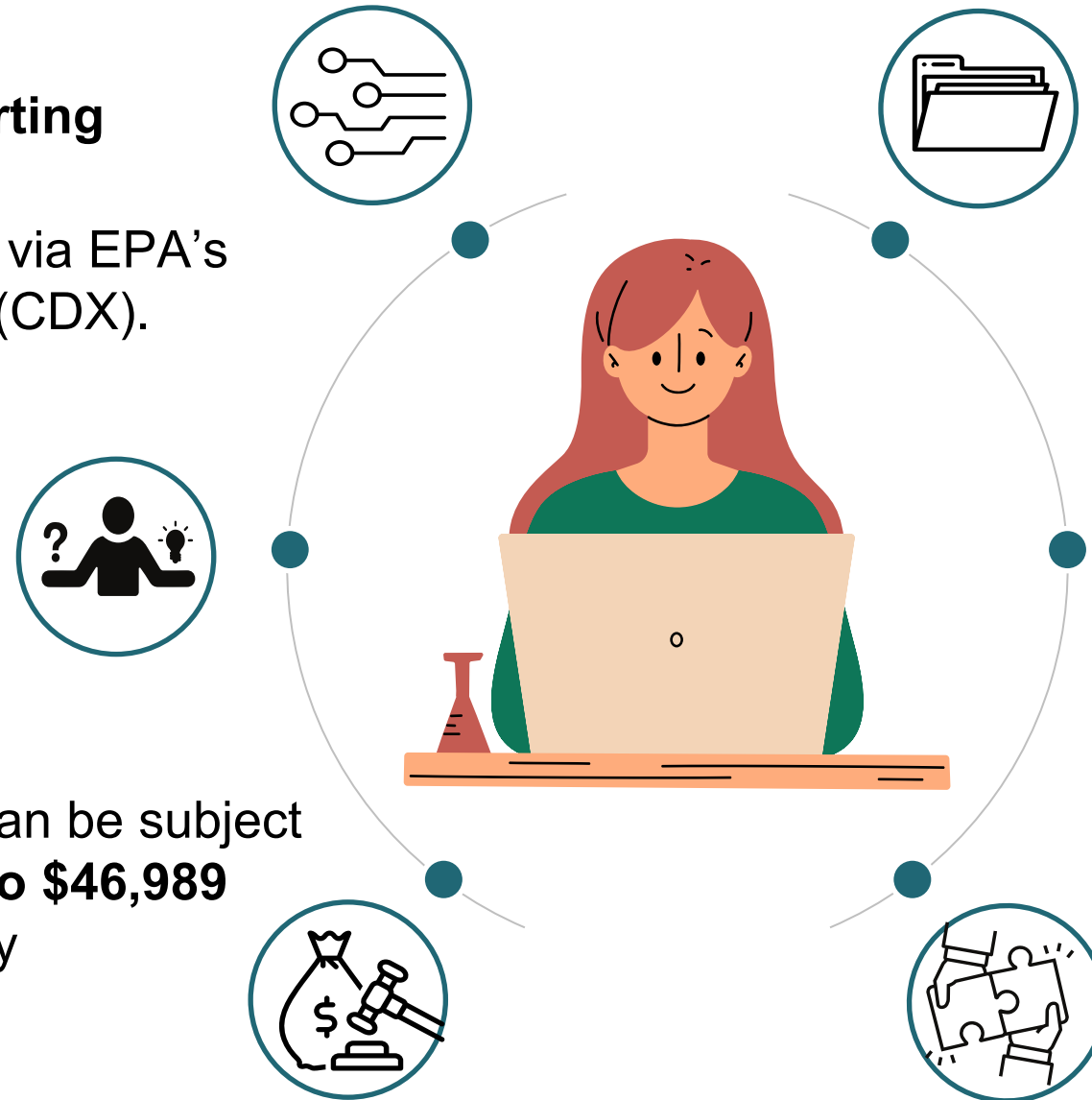
This is not exhaustive scope of PFAS !



TSCA Section 8(a)(7) PFAS Reporting & Recordkeeping



- > This is a **one-time reporting** requirement.
- > **Electronic submission** via EPA's Central Data eXchange (CDX).
- > **"Reasonable estimates"**
- > **Not Known or Reasonably Ascertainable" (NKRA)**
- > Under TSCA, violators can be subject to a civil **penalty of up to \$46,989** per violation for each day



- > **5 –year Recordkeeping** period following final date of submission period
- > **Streamlined Reporting Form** is available for:
 - > Article Importers, and
 - > Manufacturers (including importers) of R&D substances manufactured below 10 kg/year
 - > Chemical identity, molecular structure, industrial processing & use information, import production volume



Canada Reporting Requirements

Overview

- The Section 71 notice applies to:
 - Manufacturers of substances, importers of substances, mixtures or manufactured items within 2023 calendar year
 - Reporting is required for **312 specific PFAS** 'known or anticipated to be in Canadian commerce', not recently surveyed. Categorized in Schedule 1 into Parts 1, 2 (polymers), and 3 based on properties and uses.
 - The notice **aims to gather baseline commercial use** data for future regulatory activities.

- **Reporting via XLS into Environment and Climate Change Canada's online system.**
- **Notice published 27 July 24, Deadline to submit 29 January 2025.**

Exclusions

- Substance is in transit through Canada
- Is for personal use
- Intended for laboratory use
- Is or is contained in hazardous waste or hazardous recyclable material
- Is contained in pest control product, fertilizer, feed, or seed registered under the relevant Act
- Does not apply to persons classed as micro-business



Canada Reporting Requirements



Reportable activity	Substance alone	Mixture	Product (e.g. Paint, varnish)	Manufactured item (e.g. vehicle, laptop)	Quantity threshold for a substance	Concentration threshold for substance in a mixture, product or manufactured item
Manufacture	Yes	-	-	-	greater than 1000 g	-
Import	Yes	Yes	Yes	Yes	greater than 10 g OR greater than 100 kg ^a	greater than or equal to 1 ppm
Use in the manufacture of a good ^b	Yes	Yes	Yes	-	greater than 10 g	greater than or equal to 1 ppm ^c

^a Threshold is 10 g for a substance listed in Part 1 of Schedule 1 and 100 kg for a substance listed in Part 2 or Part 3 of Schedule 1. For imported manufactured items that are not captured by the 12 categories, threshold is 100 kg for any substance listed in Schedule 1.

^b Does not include use of a manufactured item to produce another mixture, product or manufactured item

^c NB/ **Use in the manufacture of a good**” means using a reportable substance, either alone, in mixture or product, to commercially create or make another mixture, product, or manufactured item

Canada Reporting Requirements



Categories of imported manufactured items & Tiered reporting

Specific reporting obligations are set out for the following manufactured item Categories

1. Intended to be used by or for children under the age of 14 years (e.g. playmat, pacifier):
2. Intended to come into contact with the mucosa of an individual (e.g. mouth guard, hearing aid):
3. Used as intended such that the substance may be inhaled, or come into dermal or oral contact with an individual (e.g. air freshener):
4. Cookware, or a cooking or serving utensil that is intended to come into direct contact with heated food or beverage
5. Food packaging material
6. Reusable food or beverage container (e.g. baby bottle):
7. Food processing equipment used prior to packaging & distribution (e.g. trays, moulds, cutters)
8. Clothing or footwear
9. Bedding, sleeping bags, or towels
10. Furniture, mattresses, cushions (e.g. sofas, vehicle or airplane seats)
11. Carpet, vinyl or laminate flooring, or foam underlay for flooring, intended to be used by an individual (e.g. vehicle carpet)
12. Substance is intended to be released from the manufactured item (e.g. personal care wipes, deodorant, writing instruments)

Canada Reporting Requirements



Categories of imported manufactured items & Tiered reporting

If your manufactured item **is** captured by one of the 12 categories and thresholds are exceeded, you must provide:

- application code(s) (e.g. C101– Floor coverings)
- substance function code(s) (e.g. U031 – Surface active agents)
- a description and the common or generic name of the good
- the concentration, or concentration range, of the substance in the good
- whether the good was exported or not
- whether the good is intended for commercial use, consumer use or use by or for children

- **For PFAS polymers in Part 2:**

- (a) molecular weight distribution of the substance;
- (b) the structural formula of the substance;
- (c) expected conditions resulting in the degradation, depolymerization, or decomposition of the polymer and identification of decomposition products;
- (d) the CAS RN and name of each monomer that is part of the polymer; and
- (e) the concentration, or range of concentrations, expressed as percent by weight (w/w%) of each monomer listed in paragraph (d).

Canada Reporting Requirements



Categories of imported manufactured items & Tiered reporting

If your manufactured item **NOT** captured by one of the 12 categories and thresholds are exceeded, you must provide:

- your company information
- a short description and generic name of the manufactured item containing the substance

Canada Reporting Requirements



Compliance and Enforcement

- **Compliance** is enforced **under** the Canadian Environmental Protection Act (**CEPA**), 1999.
- **Penalties for non-compliance** include fines **up to \$500,000** for corporations, with increased penalties for repeat offenses.
- Extension requests must be submitted in writing before the deadline, including specific details about the entity and PFAS involved.



Process to extend Canada Compliance Deadline

- Companies looking to extend their compliance deadline for the ECCC-PFAS Reporting rule must submit a request to the ECCC at the following email address:
substances@ec.gc.ca
- Commercial solution providers and trade associations may not request on your behalf.
- Companies should submit deadline extension requests *as soon as possible*
- ECCC has indicated they **will not consider** requests submitted near or beyond the due date:

January 29, 2025

REQUEST AN
EXTENSION!



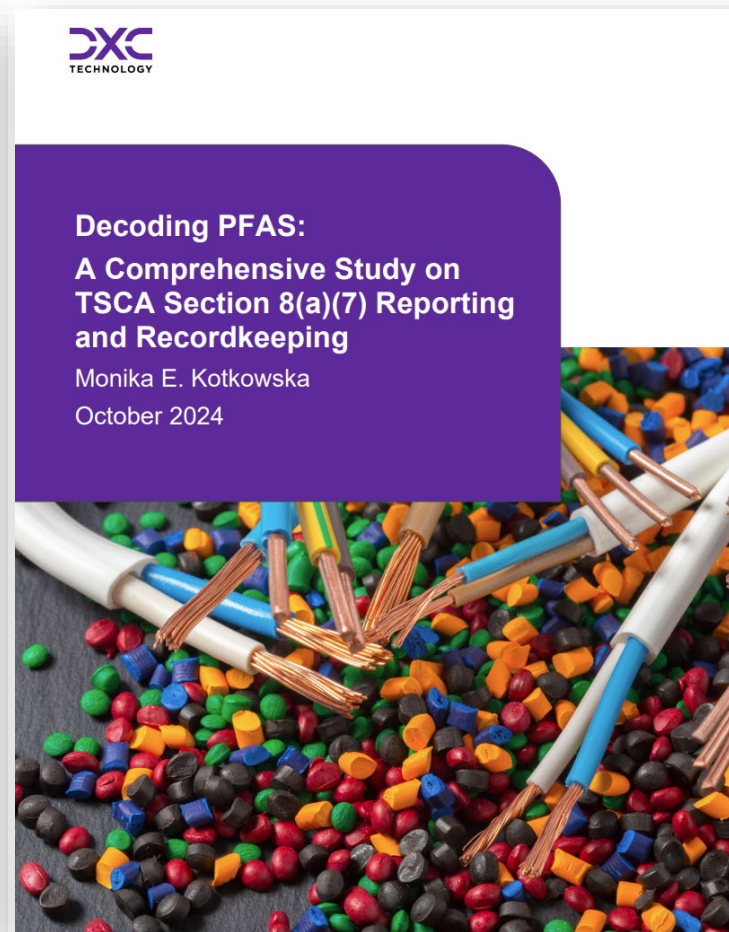
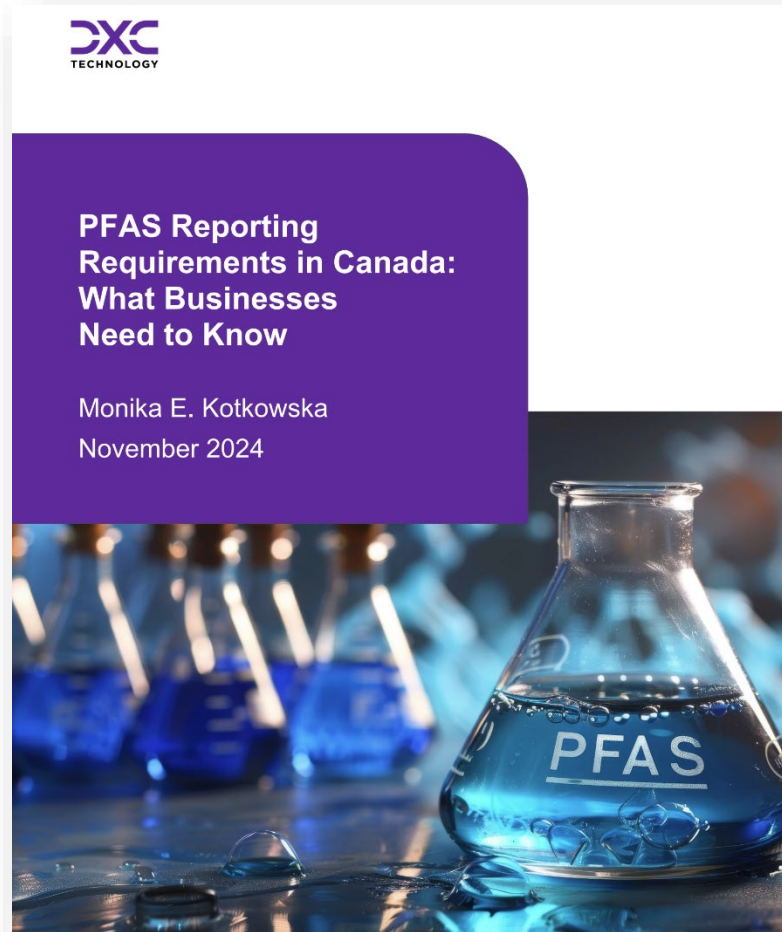
REQUEST AN
EXTENSION!



TSCA Section 8(a)(7) vs. Canadian PFAS Framework

Feature	US TSCA Section 8(a)(7)	Canada PFAS Reporting
Regulatory Body	U.S. Environmental Protection Agency (EPA)	Environment and Climate Change Canada (ECCC)
Reporting Requirement Start Date	Delayed to July 11, 2025, with reporting period running until January 11, 2026 for most companies; small businesses until July 11, 2026	Reporting for specific PFAS types must be submitted by January 29, 2025
Scope of Reporting	Structural definition of PFAS. There is no discrete list of individual PFAS	Focuses on 312 specific PFAS substances listed in Schedule 1 of the notice
Data Required	Includes chemical identity, production volumes, use categories, disposal methods, and exposure data	Information on manufacture, import, and use of specified PFAS substances
Year of Reporting	Reporting covers all manufacturing and importing activities from January 1, 2011, through December 31, 2022.	Reporting pertains to activities conducted in calendar year 2023 only.
One-Time Reporting	This is a one-time reporting event mandated by the Fiscal Year 2020 National Defense Authorization Act (NDAA).	One-time reporting event
Data submission	Electronic submission through EPA's Central Data eXchange (CDX).	Electronic submission through Environment and Climate Change Canada's system.

Whitepaper



Download here:
[DXC - Supportive Material - CDX Web](https://public.cdssystem.com/en/web/cdx/newsletter)

Subscribe to our newsletter at
<https://public.cdssystem.com/en/web/cdx/newsletter>

Official Government Resources



Government
of Canada

Gouvernement
du Canada

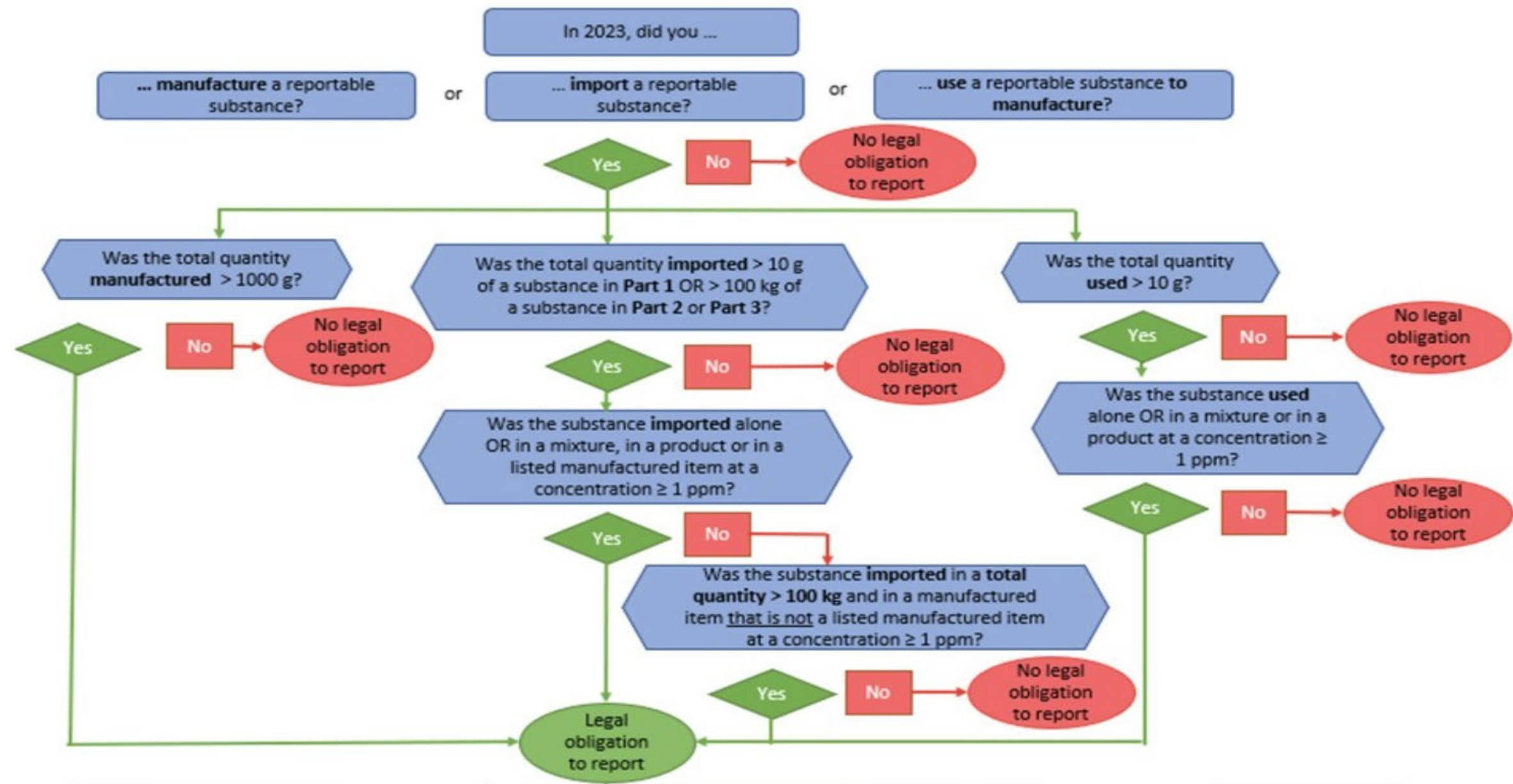
1. [Notice with Respect to Certain Per- and Polyfluoroalkyl Substances \(PFAS\)](#)
 - This is the official regulatory notice issued by the Canadian government requiring reporting on PFAS substances.
2. [Guidance Manual for Responding to the PFAS Notice](#)
 - This document provides detailed instructions and explanations to help companies comply with the reporting requirements..
3. [ECCC Single Window](#)
 - This is the official online system provided by Environment and Climate Change Canada for submitting the required PFAS reports.
 - [Using Environment and Climate Change Canada's Single Window](#)
4. [Revised risk management scope for per- and polyfluoroalkyl substances \(PFAS\)](#)
 - This document outlines the government's updated approach to managing risks associated with PFAS substances.

8. PFAS Excel Reporting File (ERF)

- A prescribed Excel file for responses, which must be submitted through online reporting system

Instructions
This Excel Reporting File has been developed to assist you in meeting the reporting requirements of the <i>Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)</i>. Note that in the case of a discrepancy between the Excel Reporting File, the <i>Canada Gazette</i> notice or the <i>Canadian Environmental Protection Act, 1999</i> (CEPA), the official version of the notice and CEPA take precedence.
Excel Reporting File and Single Window Online Reporting
To prepare your response, fill out the requested information in the Excel Reporting File making sure that the File Completion status in the <i>File Status</i> tab is "Complete". If you need more rows for data entry than provided in this file, please contact the Substances Management Information Line (contact information below). Your completed Excel Reporting File should be saved using the following file naming format "ORGANIZATION NAME PFAS s71 ERF.xlsx". For guidance to help determine if you are subject to the notice and for additional assistance with completing the sections of the notice, refer to the Guidance manual for responding to the: <i>Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)</i>. Link: https://www.canada.ca/en/health-canada/services/chemical-substances/canada-approach-chemicals/information-gathering/initiatives.html Environment and Climate Change Canada's Single Window is an online data reporting system. Persons subject to the notice shall use this system to provide a response. Link: https://ec.gc.ca/en/cs Refer to "Single window for online CEPA s.71 submissions – How-to guide" (referred to as the "How-to guide") for details on how to create an account in the Single Window Information Manager (SWIM) and how to use the initiative "Chemicals Management – General". Specific instructions on how to submit a response to the notice through SWIM are provided in Section 8 of the "How-to guide". Link: https://www.canada.ca/en/environment-climate-change/services/evaluating-existing-substances/sw-for-cepa-section71-guide.html
General Considerations
1. For optimal functioning of the Excel Reporting File, it is recommended to enter the information sequentially (i.e. stepwise). The <i>Section 8</i> tab must be completed before proceeding to the applicable subsequent tabs. Only the substances selected on the <i>Section 11</i> tab will be included in the list of "Substance Identifier" in the <i>Section 12</i> tab. Only Part 2 substances selected on the <i>Section 11</i> tab will be included in the list of "Substance Identifier" in the <i>Section 13(a)(b)(c)</i>, <i>Section 13(d)(e)</i> and <i>Section 13 & 14 Files</i> tabs. If a substance is not on the list, review and update your entry in the <i>Section 11</i> tab. 2. The Excel Reporting File will display error messages in the "Status" column on each tab and on the <i>File Status</i> tab. The <i>File Status</i> tab will inform you of the status of completion of each tab and the status of completion of each substance added to this file. If errors exist in one or more tabs, the <i>File Status</i> tab will describe where these errors are found. These errors will need to be resolved before submitting this file. 3. Throughout the Excel Reporting File, status messages indicate whether all the required information has been provided in each of the sections. When applicable and for each row, status messages may read: • "Error(s): ..." when one or more errors are found on the tab, in a specific column, for the row. This is followed by detailed warning messages, which are shown in order, for example: "Error(s): Information is missing in column B". When the error pertaining to the shown warning message is resolved, the next warning message will appear if the record still has one or more errors. • Note: When there is more than one error left, the message will be highlighted in red. When there is only one outstanding error to resolve, the message will be highlighted in yellow. • "Complete" when all the required information is provided.
InstructionsSection 8Section 9Section 10Section 11Section 12Section 13(a)(b)(c)Section 13(d)(e)Section 13 & 14 FilesFile StatusSubstances & Codes

Reporting & Submission Process: A Step-by-Step Overview



Reporting & Submission Process: A Step-by-Step Overview

CDX Supply Chain Data Collection & Where-Used Analysis greatly facilitate Steps 1-4 of this 6-step process!

1. Determine applicability to identify produced or imported products (see previous slides)

- Identify products likely to contain relevant substances under Schedule 1, 2, and 3, and in what amounts

2. Conduct gap analysis and prioritization

- Identify products for which all or most of the required relevant substance information is available
- Understand the Environment and Climate Change Canada (ECCC) Excel Reporting File (ERF) requirements
- Develop a risk-based strategy to prioritize data collection for products suspected to contain relevant substances

3. Prepare to solicit missing information for potentially relevant products

- If feasible, ensure supplier contracts require suppliers to support your legal obligations
- Educate suppliers to obligations, intended action plan, and consequences of failure prior to soliciting data

4. Gather the required information

- Accept that complex goods parts and assembly suppliers may require multi-tier data collection for substance data
- Leverage industry trade groups and shared product chemical management solutions to help remain informed
- Unless Full Material Disclosure (FMD) for all PFAS was already your company practice before the legislation, the reporting period will likely not be sufficient for complete information gathering

5. Complete the Environment and Climate Change Canada (ECCC) Excel Reporting File (ERF)

- This template guides relevant companies through the reporting process in a consistent format

6. Submit your company ERF via the ECCC Single Window reporting system

- This platform ensures secure transmission and is the only method of submission accepted

CDX Demo

<https://public.cdssystem.com>

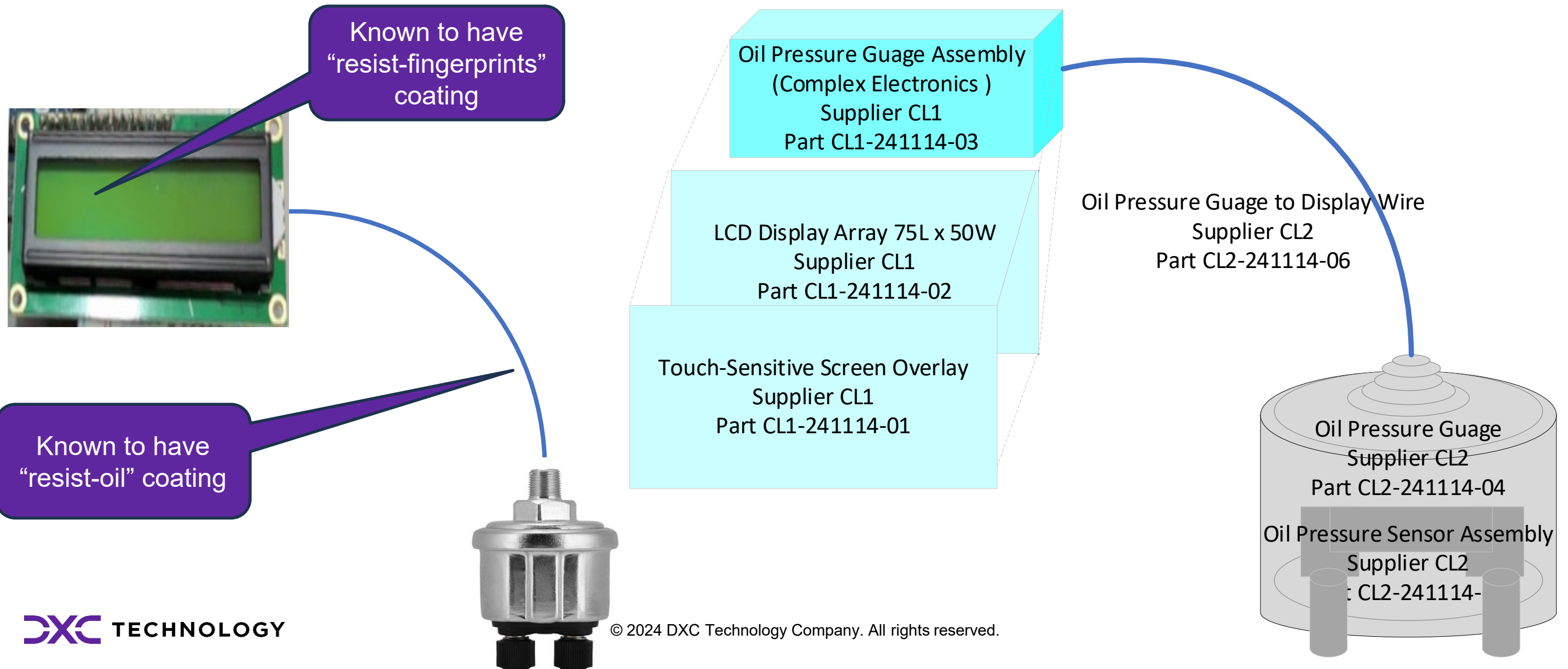


Product Example –

1. Determine Applicability

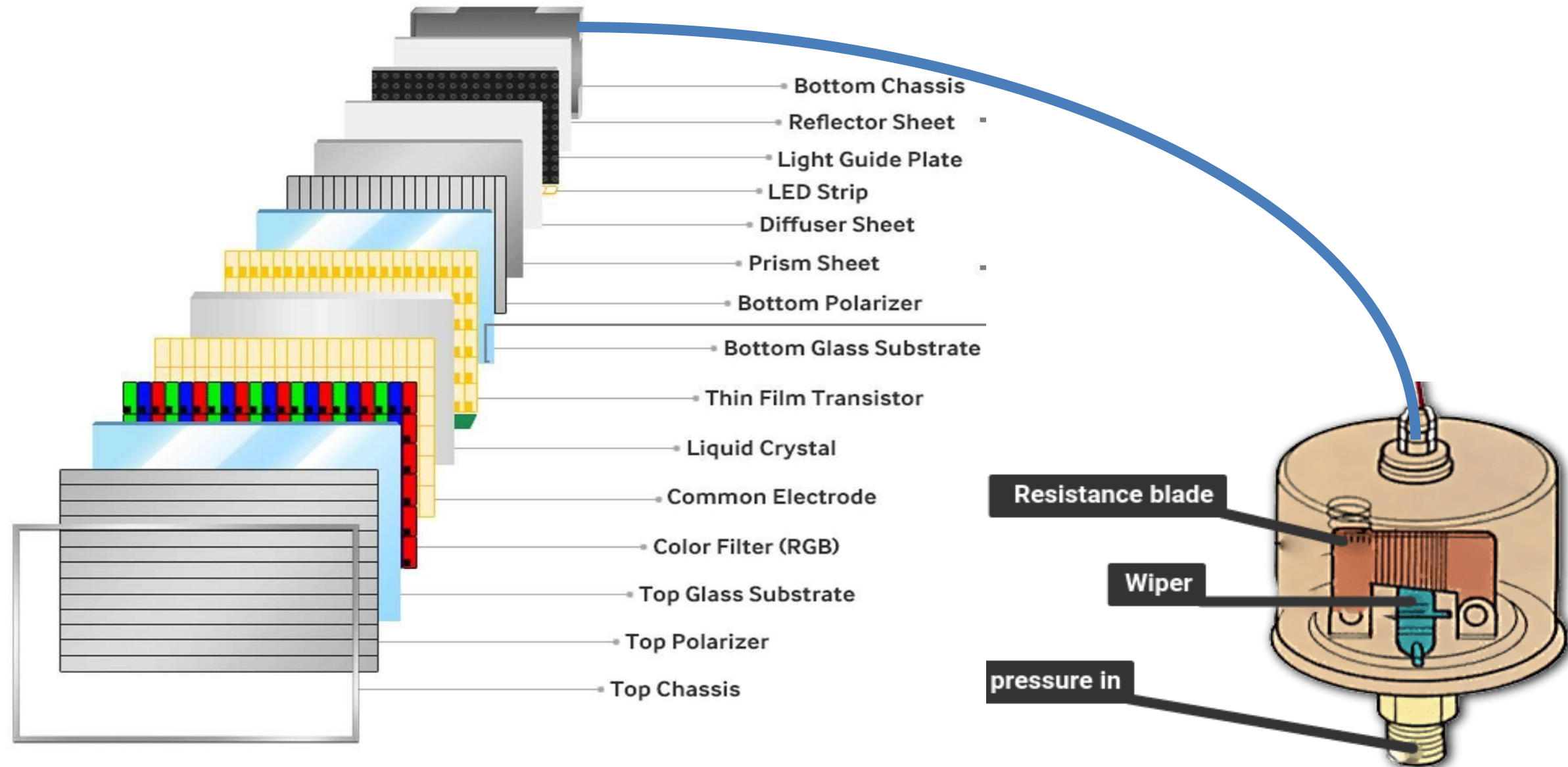
Extremely simplified example product – Oil pressure gauge with touchscreen display

1. Determine applicability
2. Conduct gap analysis & prioritization
3. Prepare to solicit missing information
4. Gather the required information



Product Example: Oil gauge with digital touchscreen display

More realistic complexity of actual example product – Oil pressure gauge with touchscreen display – simplified for demo



Conduct Gap Analysis

Identify needed Suppliers, Bill of Assembly part names and numbers, and perceived risk level associated with each supplier product

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Supplier CL1	Oil Pressure gauge Assembly	Part CL1-241114-111-01
Supplier CL1	LCD Display Array 75L x 50W	Part CL1-241114-111-02
Supplier CL1	Touch-Sensitive Screen Display	Part CL1-241114-111-03
Supplier CL2	Oil Pressure gauge	Part CL2-241114-112-04
Supplier CL2	Oil Pressure Sensor Assembly	Part CL2-241114-112-05
Supplier CL2	Oil Pressure gauge to Display Wire	Part CL2-241114-112-06

Supplier_Name	Supplier_ID	Part_Name	Part_Number	
CL1	111	Oil Pressure gauge Assembly	CL1-241114-111-01	Low Risk – no known need for PFAS
CL1	111	LCD Display Array 75L x 50W	CL1-241114-111-02	Low Risk – no known need for PFAS
CL1	111	Touch-Sensitive Screen Display	CL1-241114-111-03	High Risk – known PFAS “behavior” item
CL2	112	Oil Pressure gauge	CL2-241114-112-01	Medium Risk – known exposure to oil
CL2	112	Oil Pressure Sensor Assembly	CL2-241114-112-02	Medium Risk – known exposure to oil
CL2	112	Oil Pressure gauge to Display Wire	CL2-241114-112-03	High Risk – known PFAS “behavior” item

Prepare to Solicit Missing Information

CDX Material Data Sheet (MDS) Request Template (ver. 1.3)

Use reports from product data information sources to create CDX import file

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COMPANY NAME (mandatory)	TYPE (mandatory)	PART NAME (mandatory)	Sponsored (optional)	DEADLINE (mandatory)	SUPPLIER CODE (optional)	PROJECT (optional)	PART/Item No (optional)
CL Demo 1	Component	Oil Pressure gauge Assembly	Yes	2024.11.30	111	2024-25 US/Canada PFAS	CL1-241114-111-01
CL Demo 1	Component	LCD Display Array 75L x 50W	Yes	2024.11.30	111	2024-25 US/Canada PFAS	CL1-241114-111-02
CL Demo 1	Component	Touch-Sensitive Screen Display	Yes	2024.11.30	111	2024-25 US/Canada PFAS	CL1-241114-111-03
CL Demo 2	Component	Oil Pressure gauge	Yes	2024.11.30	112	2024-25 US/Canada PFAS	CL2-241114-112-01
CL Demo 2	Component	Oil Pressure Sensor Assembly	Yes	2024.11.30	112	2024-25 US/Canada PFAS	CL2-241114-112-02
CL Demo 2	Component	Oil Pressure gauge to Display Wire	Yes	2024.11.30	112	2024-25 US/Canada PFAS	CL2-241114-112-03

Import MDS Request information into CDX, and use CDX to send to Suppliers

- compliance.data.exchange

MDS
Functions
Administration
Help

Own MDS Requests

Ingredients

Supplier data

Recipient data

Analysis

MDS Request

ID / Type / Project

Request ID

Request bulk import ID

Type

Request Group ID

Only imported from Template

No

Date / Status

Deadline date

from 11/18/2024 to 12/31/2024

☒ open requests
☐ Overdue

☒ new
☒ sent
☒ awaiting acceptance
☐ completed
☒ rejected

Recipient / Requester

☐ Enable search by company

Recipient

Company / Org ID

Recipient search is disabled.

Requester

☐ supplier registration open

Supplier Code

MDS

Assigned MDS

Name

Recipient Part Number

View

Menu

Export

Statistics

Download template

Import

Export as CSV file (.csv) ...

Search

Request bulk import ID	Request ID	Type	Project	Creation date	Deadline date	Status	Supplier Code	Recipient [Company ID]	Recipient Part Number	Name	Sponsored
7188	149104		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	112	CL Demo 2 [112]	CL2-241114-112-03	Oil Pressure Guage to Display Wire	true
7188	149103		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	112	CL Demo 2 [112]	CL2-241114-112-02	Oil Pressure Sensor Assembly	true
7188	149102		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	112	CL Demo 2 [112]	CL2-241114-112-01	Oil Pressure Guage	true
7188	149101		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	111	CL Demo 1 [111]	CL1-241114-111-03	Touch-Sensitive Screen Display	true
7188	149100		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	111	CL Demo 1 [111]	CL1-241114-111-02	LCD Display Array 75L x 50W	true
7188	149099		2024-25 US/Canada PFAS	11/18/2024	11/30/2024	sent	111	CL Demo 1 [111]	CL1-241114-111-01	Oil Pressure Guage Assembly	true

Rows Selected1

Menu

Total records found: 6

Gather the required information

Example MDS Request notification email for a CDX registered supplier

- 1. Determine applicability
- 2. Conduct gap analysis & prioritization
- 3. Prepare to solicit missing information
- 4. Gather the required information

From: cdx-mailer@cdxsystem.com <cdx-mailer@cdxsystem.com>
Sent: Monday, November 18, 2024 9:50 AM
To: LePard, Chuck <chuck.lepard@dx.com>
Subject: Sponsored Material Data Sheet (MDS) Request Received: (Name: Oil Pressure Sensor Assembly) (CDX Modeloffice 2)

Dear Chuck LePard,

A Request for the Material Data Sheet (MDS) "Oil Pressure Sensor Assembly" due on 11/30/2024 has been sent by Canada on US Border (40864) to CL Demo 2 (112). You can directly open the request [149103](#) after logging on to CDX using this link.

from the Toolbar (or use the menu Functions InBox). Select MDS Request. In the resulting screen, click Search

As an alternative you can manually navigate through CDX as described here:

Once you have logged in [CDX](#), please select the InBox (on the right) to locate the client request.

Best regards, Your CDX Team

Recipient specific data	
Request ID	149103
Name:	Oil Pressure Sensor Assembly
Part/Item No.: :	CL2-241114-112-02
Comment:	 (Customer-Specific Message to Supplier) All of our N.A. Supplier Contracts and T&Cs (which your company has accepted and signed) require our suppliers to support OUR legal obligations, even if our suppliers do not share those obligations. Therefore, even if you do not do business in the U.S., Canada, and the European Economic Area (EEA), you must still provide us the information we need to sell our products containing your products for these regions. We recognize you may not know the full chemical content for these products, so we have funded the capability for you to cascade requests to your suppliers using the CDX System, to as many tiers as are required to obtain the necessary legal information. The identities of such suppliers are confidential and hidden from everyone by the CDX System, even from us. Only the product content is visible. Note: Trade names are exposed; ensure these are not provided if you want to keep the information unreported.

Gather the required information

Example MDS Request notification email for a CDX registered supplier

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Gather the required information

Example of a CDX Client's supplier using "Drive MDS Request" to obtain material and substance declarations for a supplied component

1. Determine applicability
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The screenshot displays the 'Create New Drive MDS Request' interface within the CDX Technology system. The interface is divided into several sections:

- MDS Request:** Includes fields for Status (new), Deadline date (11/29/2024), Supplier (PM Plastic Metal [122]), Requester Company (CL Demo 1 [111]), Requester MDS Contact (LePard, Chuck), and Project (dropdown menu).
- Attachment:** A section for adding files, showing a table with columns for Filename, Document Type, Information, and Upload Date. It indicates 'No files attached to this MDS Request'.
- Recipient data:** Contains fields for Supplier Code, Company Supplier Codes, Admin Supplier Codes, Part material name (Touchscreen compound), Part/Item No. (with a 'Choose File' button), and Supplier Part/Item No. (also with a 'Choose File' button).
- MDS:** A section for selecting the type of declaration, including checkboxes for 100% declaration, SCIP Compliance, Attachment required, Component (Measured Weight per Item), Parts Marking, Semicomponent (Specific weight), and Material (Symbol, Standard Material No.). It also includes a dropdown for Regulation and Basic Substance group/list.
- Regulation:** A section at the bottom for selecting the applicable regulation.

At the bottom right, there are buttons for 'Send', 'Save', and 'Close'.

Gather the required information

Example of an CDX Material Data Sheet identifying PFAS compounds from a supplier using CDX

1. Determine applicability
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The screenshot displays the CDX Technology MDS interface. The left sidebar shows a tree view of materials, with 'Touch-Sensitive Screen Display' expanded to show '100.0g Touchscreen compound'. The main area shows the 'Details' tab for a specific compound, '2-Naphthalenecarboxamide, N,N'-(2,5-dichloro-1,4-phenylene)bis(4-((2-chloro-5-(trifluoromethyl)phenyl)azo)-3-hydroxynaphthalene-2-carboxamide)'. The details include common information, name(s), identifier(s), amounts and weights, and basic substance group/list. A callout box points to the 'Basic Substance group/list' section, which includes 'Canada PFAS Part 1', 'Chlorine compounds', 'GADSL: Declarable', and 'Per and Poly- fluoroalkyl substances (PFAS)'.

Note: This specific PFAS compound appears in Canada PFAS list, yet not in TSCA 8(a)7 list.

Full Material Declaration with Intellectual Property protection for no-obligation-to-declare substances is the most effective method to avoid re-soliciting the complete supply chain following each new in-scope regulation!



Questions and answers