Government of Canada / Gouvernement du Canada

Guidance Manual

For responding to the:

Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)

Environment and Climate Change Canada

Health Canada

July 2024

Canada

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1 Introduction

This document provides guidance for responding to the *Notice with respect to certain per- and polyfluoroalkyl substances (PFAS)*, published in the *Canada Gazette*, Part I on July 27, 2024, pursuant to paragraph 71(1)(b) of the *Canadian Environmental Protection Act, 1999* (CEPA). This information gathering initiative applies to 312 substances listed in Schedule 1 of the notice[1]. The deadline for responding to the notice is January 29, 2025. The purpose of this notice is to collect information on certain PFAS substances, either alone, in mixtures, products, or manufactured items in Canadian commerce for the calendar year 2023. This information will be used to establish baseline commercial use data and support future activities related to the class of PFAS. The list of substances in Schedule 1 of the Notice is not intended to be an exhaustive list of substances, or capture all substances mentioned in other government PFAS initiatives, but is focused on those substances known, or anticipated to be in Canadian commerce that have not been recently surveyed. For more information on the management of chemical substances, please visit the Government of Canada's Chemicals Management Plan webpage. For information on information gathering initiatives, including links to the notice, Excel Reporting File (ERF) and substance list, visit the Information gathering initiatives webpage.

Please note that this document is for guidance only and, in the case of a discrepancy between this document and the *Canada Gazette* notice or CEPA, the official version of the notice and CEPA take precedence.

2 Who is required to respond (notice sections 2 to 6)

The notice applies to any person who, during the 2023 calendar year, satisfied any of the following criteria:

- **manufactured** a total quantity greater than 1000 g of a substance listed in Schedule 1
- **imported** a total quantity greater than 10 g of a substance listed in Part 1 of Schedule 1, OR a total quantity greater than 100 kg of a substance listed in Part 2 or Part 3 of Schedule 1, whether the substance was alone, or at a concentration equal to or above 1 ppm in a mixture or in a product or at a concentration equal to or above 1 ppm in one of the categories of manufactured items in Table 1

[1] NOTE: Schedule 1 refers to the list of substances identified in the N*otice with respect to certain per- and polyfluoroalkyl substances (PFAS).*

- **imported** a total quantity greater than 100 kg of any substance listed in Schedule 1 at a concentration equal to or above 1 ppm in a manufactured item NOT listed in the categories of manufactured items in Table 1
- **used** a total quantity greater than 10 g of a substance listed in Schedule 1, whether the substance was alone, or at a concentration equal to or above 1 ppm in a mixture or in a product, **in the manufacture** of a mixture, a product or a manufactured item

Note that you must also consider each activity and each substance separately. The substances listed in Schedule 1 of the notice are identified by either a Chemical Abstracts Service registry number (CAS RN), which follows the format #####-##-#, or a Confidential Accession Number (CAN), which follows the format #####-#. A CAN is a number assigned by Environment and Climate Change Canada to identify a confidential substance in Government of Canada publications, including the Domestic Substances List. If you know the identity of a substance identified with a CAN and meet the reporting criteria of the notice, you are required to report.

If you meet any of the above criteria you are required to provide a response to the notice (see section 4: CEPA Section 71 response). If you do not meet the criteria but are involved with listed or non-listed PFAS you are highly recommended to submit a Declaration of Stakeholder Interest (see section 4: Declaration of stakeholder interest). The absence of information may result in the use of conservative assumptions in risk assessment or potential risk management measures which may impact your ability to manufacture, import or use certain substances, or mixtures, product and manufactured items containing these substances in Canada.

A foreign supplier (that is, exporting to Canada, located outside of Canada) is not subject to the notice. Rather, the receiver (who imports to Canada) must respond to the notice if the criteria are met. Foreign suppliers are encouraged to inform their Canadian customers (i.e., Canadian importers) that they import a reportable substance and may meet the reporting criteria of the notice. A letter to help Canadian stakeholders obtain data from their foreign suppliers is available for download on the Request for information from foreign suppliers webpage. If Confidential Business Information (CBI) cannot be shared with Canadian stakeholders to allow them to respond to the notice, foreign suppliers and Canadian importers can agree to submit information together, in the form of a blind submission. A blind submission allows foreign suppliers and Canadian stakeholders to collaborate and provide all the information required in the notice while still protecting CBI. Please contact the Substances Management Information Line (substances@ec.gc.ca) for more information on the blind submissions process.

How to determine if you meet the reporting criteria (notice section 2)

Three activities reportable under the notice are:

"**Manufacture**" means the intentional or incidental (unintended) creation or production of one or more of the reportable substances.

NOTE: Incidental presence is unintended production or contamination that occurs during any production process. If companies are aware of the presence of the listed substance, they are required to report as per the notice.

"**Import**" means the movement of the reportable substance into Canada from another country whether alone, or in a mixture, product or manufactured item.

NOTE: The person, or company responsible for importation of the goods containing the substance is required to report.

> **Example 1**: Company X located in another country manufactures items containing the substance, then imports the items to Company X's facility in Canada. Company X would be required to report.
>
> **Example 2**: Company X which is located in Canada, orders and imports a mixture containing the substance from another country. Company X would be required to report.
>
> **Example 3**: Company X located in Canada, imports substances then sells or distributes to other companies within Canada. Company X would be required to report.

"**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 (i.e., a good).

NOTE: Use of manufactured items to manufacture or assemble other manufactured items is not a reportable activity.

Figure 1 outlines the processes to help determine if you meet the reporting criteria of the notice. Your answers to the questions will help provide an indication of whether you are required to submit a section 71 response.

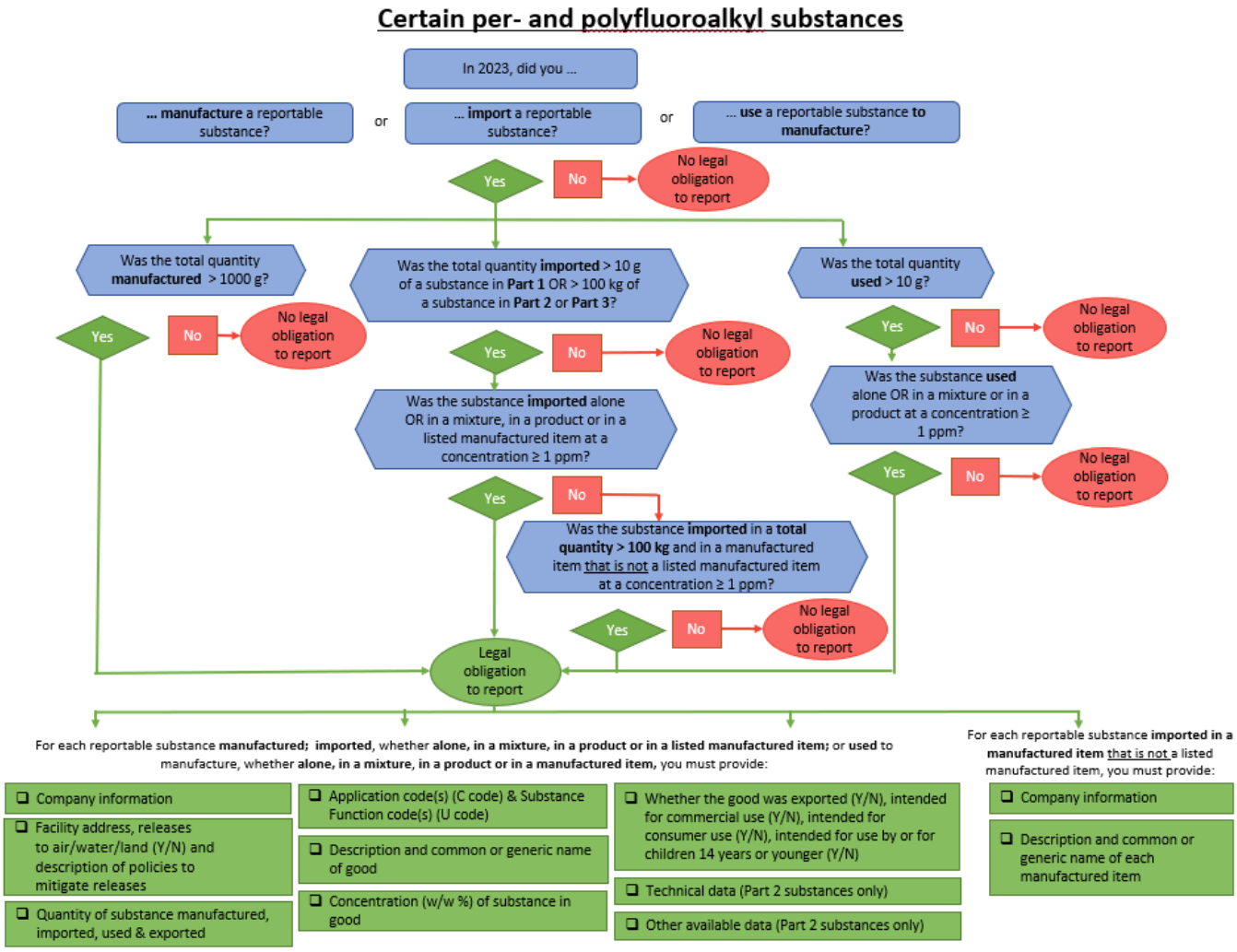


Figure 1. Overview of reporting criteria and requirements

Formulas are available to help with the calculations for reportable activities, to assess whether the quantity and concentration thresholds are exceeded.

For imported manufactured items, you should calculate the concentration on the component that contains the substance. For example, if the substance is present in furniture textiles and you imported couches containing the textile, calculate the concentration of substance in the textile. If information is not reasonably accessible for components, calculate the concentration for the entire manufactured item (e.g., the couch).

The following definitions may help you determine whether you are subject to the notice or not.

A "**substance alone**" means a reportable substance that is not intentionally combined or mixed with anything else.

NOTE: It is recognized that the substance alone may be a range of concentrations (Example: Acetone 50 –100%), but if the intent of the process is to create a pure product, it is reported as substance alone.

A "**mixture**" is a combination of substances that does not produce a substance that is different from the substances that were combined, including a prepared formulation, hydrate and reaction mixtures that are characterized in terms of their constituents.

A "**manufactured item**" is an item that is formed into a specific physical shape or design during manufacture and has, for its final use, a function or functions dependent in whole or in part on its shape or design.

NOTE: All manufactured items are reportable under the notice provided that their reportable thresholds are exceeded. Manufactured items that belong to one of the imported manufactured item categories outlined in subparagraphs 2(2)(c)(i) to (xii) of the notice are subjected to different information requirements than manufactured items that do not belong in these categories.

Declaration of stakeholder interest0Table 1Table 1: Imported Manufactured Item Categories & Examples

Categories of reportable manufactured items	Examples of manufactured items
Intended to be used by or for children under the age of 14 years	Play mats, pacifiers, toys for babies, toddlers and children, board books, teething toys, or plastic toy jewellery
Intended to come into contact with the mucosa of an individual	Cotton-tipped applicators, mouth guards, dentures, orthodontic equipment (e.g., braces, retainers), hearing aids, nasal spray applicator, thermometers, tampons, condoms, or contact lenses
Used as intended such that the substance may be inhaled, or come into dermal or oral contact with an individual	Scented paper items, air fresheners, candles, markers, dryer sheets, cleaning wipes, face masks / shields, beauty face masks, disposable / non-disposable gloves, mouth guard, or mobile phone cases
Cookware or a cooking or serving utensil that is intended to come into direct contact with heated food or beverage	Pots and pans, woks, griddles, serving ladles or spatulas, plates, bowls, or cutlery
Food packaging material, including single-	Single serve / disposable containers such as bowls,

serve/disposable bowls, plates, cups, other serving-ware, as well as food cans and lid liners, that are intended to or may come into direct contact with food or beverage	plates, or cups; bottles such as disposable plastic bottles; plastic, wax, or aluminum food wrap; cereal bags; food or beverage cans, jars or containers; or lids of containers
Reusable food or beverage container	Reusable water bottles, travel mugs, reusable food storage containers and lids, or baby bottles
Food processing equipment, including conveyor belts, trays, vats, nozzles, moulds, and cutters that come into contact with food or beverage prior to packaging and distribution	Conveyors, trays, vats, nozzles, moulds, cutters, or any other machinery or objects that come into contact with food or beverage during processing
Clothing or footwear, including life jackets, personal flotation devices, and other safety apparel	Shirts, pants, outerwear (e.g., coats, gloves, hats), undergarments (e.g., underwear or boxer shorts), sleepwear (e.g., pyjamas); socks, shoes, boots, slippers, sporting gear (e.g., skates, helmets, shin pads, gloves), protective clothing used in an occupational setting, inflatable vests, or life jackets Excluded: wallets, handbags, backpacks
Bedding, sleeping bags, or towels	Sheets, pillow cases, blankets, sleeping bags, bathroom or kitchen towels, mattress protectors, or camper / camping bedding Excluded: tents
Furniture, mattresses, cushions or pillows intended to be used by an individual, where the substance is contained in foam or leather or in a textile fibre, yarn, or fabric	Mattresses including foam mattresses; pillows; cushions; chairs; sofas; mattress pad; camping / camper mattress, cushions or pillow; vehicle or airplane seats Excluded: lamps, televisions, dentist chair, surgical tables, hospital beds, desks, cabinets or book cases
Carpet, vinyl or laminate flooring, or foam underlay for flooring, intended to be used by an individual	Carpets or rugs; laminate or vinyl flooring; engineered hardwood, bamboo or cork flooring; vehicle carpet; flooring in homes, office buildings, hospitals, medical or sport facilities
Such that the substance is intended to be released from the manufactured item	Air freshener diffuser (substances emitted such as fragrances, solvents, etc.); personal care wipes (substances delivered by the wipes such as surfactants, fragrance, etc.); deodorant / antiperspirants (substances delivered from the applicator such as antimicrobials, propellants, etc.); writing instruments (e.g., pigments,

	dyes, solvents such as ink from pens or markers)

A “**product**” refers to anything that does not meet the definition of a mixture or manufactured item.

Examples of mixtures or products that may contain a reportable substance include:

- Textile / fabric treatment products (e.g., waterproofing spray)
- Personal care products (e.g., cosmetics)
- Consumer products (e.g., cleaners, waxes / polishes, dishwasher rinse aids, windshield wiper fluid, etc.)
- Solvents (e.g., precision cleaning fluids)
- Fluorinated gases (e.g., used as foam blowing agents, propellants, etc.)
- Paints and coatings (e.g., surface treatment products, wetting / leveling agents, etc.)
- Adhesives and sealants (e.g., caulking)
- Fire fighting foam / fire suppressants

A “**good**” is a mixture, product or a manufactured item.

A summary of activities, and quantities and concentration thresholds that identify the requirements to report for the notice are included in Table 2.

Table 2Table 2: Activity, quantity & concentration thresholds

Reportable Activity	Substance alone	Mixture	Product	Manufactured item	Quantity threshold for a substance	Concentration threshold for substance in a mixture, product or manufactured item
Manufacture	☑	-	-	-	> 1000 g	-
Import	☑	☑	☑	☑	> 10 g OR > 100 kg [1]	≥ 1 ppm
Use in the manufacture of a good [2]	☑	☑	☑	-	> 10 g	≥ 1 ppm [3]

[1] 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 in Table 1, threshold is 100 kg for any substance listed in Schedule 1.
[2] Does not include use of a manufactured item to produce another mixture, product or manufactured item
[3] The concentration threshold is applicable to the good that is used, not to the good that is produced.

If thresholds in Table 2 for each activity are exceeded, you are required to respond to the notice unless the exclusions in notice sections 5 and 6 apply.

Tiered reporting (notice section 3)

This notice has been designed with tiered reporting for imported manufactured items. If your manufactured item is captured by one of the categories listed in Table 1 and thresholds are exceeded, you must provide all information that is requested by the notice.

If your manufactured item does not fall into one of the categories listed in Table 1 and thresholds are exceeded, you will only be required to provide your company information as per notice section 8, and a short description and generic name of the manufactured item containing the substance as per notice section 9 (see Annex A).

Successors or assigns (notice section 4)

If a company or business is sold during the 2023 calendar year, a single response that amalgamates the information before and after the transfer may be submitted for the entire year. For more information on responding to the notice when there has been a change in ownership, please contact the Substances Management Information Line at 1-800-567-1999 (toll free in Canada), 819-938-3232 (outside of Canada) or substances@ec.gc.ca.

Exclusions (notice sections 5 and 6)

The notice excludes:

- micro-businesses that have fewer than five employees or make less than $30,000 in annual gross revenue annually.

The notice also excludes substances, mixtures, products and manufactured items that are:

- only in transit through Canada;
    - where “in transit” refers to the portion of an international transboundary movement of a substance through the territory of a country that is neither the point of origin nor the final destination.
- for personal use,
    - where “personal use” means a substance, mixture, product or manufactured item that is not for sale or for any commercial, industrial, occupational, institutional or other like purposes. This does not include use for commercial gain, sale or offer for sale.
- intended for use in a laboratory for analysis, in scientific research or as a laboratory standard;
    - this does not apply to facilities or laboratories involved in development activities for industrial or commercial stakeholders.
- classified as a hazardous waste or hazardous recyclable material and import / export is in compliance with the *Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations*; or
- registered under the *Pest Control Products Act, Fertilizers Act, Feeds Act or Seeds Act*.

Note: Failure to respond could result in environmental enforcement action and potential penalties to individuals and corporations.

Examples of activities that are **required to report**:

- You manufactured 10 kg of a Part 1 substance in 2023 at your facility located in Ontario. *You meet the manufacture quantity threshold of > 1000 g (or 1 kg) for a Part 1, Part 2, or Part 3 substance*.
- You incidentally manufactured 2 kg of a Part 2 substance as a by-product during the manufacturing process of another good at your Ontario facility in 2023. *You meet the manufacture quantity threshold of > 1000 g (or 1 kg) for a Part 1, Part 2, or Part 3 substance*.
- In 2023, you purchased 200 kg of a Part 3 reportable substance from a foreign supplier, and the substance was shipped directly from the foreign supplier to your location in Canada. *You meet the import quantity threshold of > 100 kg for a Part 2 or Part 3 substance alone*.
- In 2023, you ordered 1000 kg of a mixture containing a Part 1 reportable substance at 20% concentration from a foreign supplier, and the mixture was shipped directly from the foreign supplier to your distribution warehouse in Canada. *You meet the import quantity threshold of > 10 g for a Part 1 substance and the concentration threshold of 1 ppm for a mixture or product*.
- In 2023, you placed an order for a manufactured item that is captured in one of the listed categories of imported manufactured items and that contained a Part 1 reportable substance from a foreign supplier, and the manufactured items were shipped directly from the foreign supplier to your location in Canada. The manufactured item contained the reportable substance at a concentration of 0.1% and the total quantity of the reportable substance that you imported in manufactured items was calculated to be approximately 100 g. *You meet the import quantity threshold of > 10 grams for a Part 1 substance and the concentration threshold of 1 ppm for an imported manufactured item that is captured by one of the categories in Table 1*.
- In 2023, you imported a manufactured item that is not captured in one of the listed categories of imported manufactured items. Your foreign supplier informs you that the manufactured item contained a reportable substance at a concentration of 50 ppm. You calculate that you imported a total quantity of 150 kg of the reportable substance. *You meet the import quantity thresholds of > 100 kg and 1 ppm for a reportable substance contained in a manufactured item that is not captured by one of the categories in Table 1.*
- As part of an internal company transfer in 2023, 50 g of a Part 1 reportable substance is moved from a foreign branch of your company to your location in Canada. *You meet the import quantity threshold of > 10 g for a Part 1 substance alone*.
- In 2023, you imported 200 kg of a mixture that contains a Part 1 reportable substance as an impurity. Your foreign supplier informs you the concentration of the reportable substance is approximately 0.01% (or 100 ppm). *Based on the quantity (20 g) and concentration (100 ppm) you meet the import thresholds of > 10 g and 1 ppm for a Part 1 substance*.
- In 2023, you used 50 kg of a Part 1 reportable substance at 100% concentration and combined it with other components to make a mixture. *You meet the quantity threshold of > 10 g and concentration threshold or 1 ppm for a Part 1 substance for the use in the manufacture of a good activity*.
- In 2023, you mixed 15 g of a Part 1 reportable substance at 100% concentration with another substance at 100% concentration to make a product with a Part 1 reportable substance concentration of 50%. *You meet the use in the manufacture of a good quantity threshold of > 10 g and the concentration threshold of 1 ppm for a Part 1 substance*.
- You used 200 kg of a mixture containing a Part 2 reportable substance at 10% concentration to make manufactured items. In total in 2023, you used 20 kg of the substance. *You meet the use*

in the manufacture of a good quantity threshold of > 10 g for Part 2 substances and the concentration threshold of 1 ppm for a mixture.

- You use 10 kg of a mixture containing a Part 1 reportable substance at a concentration of 5% as an additive in the formulation of a product. In total in 2023, you used 0.5 kg of the substance. *You meet the use in the manufacture of a good quantity threshold of > 10 g and concentration threshold of 1 ppm for a Part 1 substance*.
- You use 100 g of a Part 1 substance as a reactant or catalyst in the manufacture of a product, but the substance does not end up in the product. *You meet the use in the manufacture of a good quantity threshold of > 10 g and the concentration threshold of 1 ppm for a Part 1 substance*.
- You use 5-10 kg on average per year of a Part 1 reportable substance as a floatation agent in mineral extraction. In 2023, you used approximately 7 kg. *You meet the use in the manufacture of a good quantity threshold of > 10 g and the concentration threshold of 1 ppm*.

Examples of activities that are **not required to report**:

- You ordered a product containing a reportable substance from a warehouse located in Canada.
- You transferred a mixture, product, or manufactured item containing a reportable substance across provincial borders to be stored in a different warehouse.
- You purchased or received a reportable substance alone, in a mixture, in a product, or in a manufactured item that was already located in Canada.
- You bought a product containing a Part 1 reportable substance from the U.S. for personal use in your home.
- You use a product, which contains a reportable substance, to service machinery and equipment.
- You use a manufactured item (e.g., a circuit board) that contains a reportable substance in the assembly of another manufactured item (e.g., a laptop).

3 What information is required (notice sections 7 to 14)

If you determine that you meet the reporting criteria of the notice, you must provide a response containing the required information, a summary of which is below:

- identification information (company / organization and person reporting)
- facility information
- quantity of the substance manufactured, imported, used in the manufacture of a good and exported
- information on goods

Detailed explanations, examples, and tips for completing your responses to notice sections 8-14 are provided in Annex A: How to complete the Excel Reporting File.

It is important to note that if you own more than one facility, you must consider the reporting criteria on a company-wide basis. Your response to the notice must amalgamate the information from all facilities owned by the company (notice section 7).

Reasonably accessible information

If you are subject to the notice, you are required to provide information that your company possesses or to which you may reasonably be expected to have access. This includes, but is not limited to, information that may be in the possession of employees or other agents of the company. For example, companies involved in the commercial production of substances, mixtures, products, or manufactured items should have access to quantities and concentrations of substances contained in items. Importers should have access to import quantities and supporting documentation such as Safety Data Sheets (SDS), product data sheets, etc. that contain information regarding the composition of imported items.

Your supply chain, including suppliers, customers, and sector associations, may be able to provide information to help you respond to the notice. For example, if you know or suspect that PFAS is present in your goods, contact your supplier to obtain the necessary information to assist in determining whether you meet the requirements of the notice, and if so, to obtain the necessary information required to respond to the notice. To that purpose, a Government of Canada letter for communicating with your foreign suppliers is available for download on the Request for information from foreign suppliers webpage. Working and communicating with your supply chain to obtain the requested information and meet the reporting obligations will help the Government of Canada ensure that all information is considered before taking any further action.

Confidential business information

Pursuant to section 313 of CEPA, any person who provides information in response to the notice may submit a written request that the Government of Canada treat the information as confidential. A request for confidentiality should only be made for information that is considered confidential under Canadian law. The expectation is that most data are not confidential, such as common or generic names, descriptions, or intended applications of products, but companies can request a confidentiality claim when it is confidential and must provide a rationale, specifically whether it concerns any of the following:

- trade secrets of any person
- financial, commercial, scientific or technical information that is confidential information and that is treated consistently in a confidential manner by any person
- information the disclosure of which could reasonably be expected to result in material financial loss or gain to, or could reasonably be expected to prejudice the competitive position of, any person
- information the disclosure of which could reasonably be expected to interfere with contractual or other negotiations of any person

If the information meets the above criteria, the Excel Reporting File allows the identification of the

information as confidential business information (CBI).

4 How to respond to the notice

Once you have determined whether you meet the reporting criteria, there are three ways to respond to the notice: a section 71 response, a Declaration of Stakeholder Interest (SHI) or a Declaration of Non-Engagement (DNE).

CEPA section 71 response

If you meet the reporting criteria of the notice, you must respond to the notice by submitting the required information in an Excel Reporting File (ERF) to the Government of Canada.

1. Download the PFAS ERF from the Responding to the PFAS notice webpage.
2. Complete the required information (detailed instructions on how to complete the ERF are included in Annex A: How to complete the Excel Reporting File).
3. Submit the ERF to the Government via Environment and Climate Change Canada's Single Window (instructions on how to submit the ERF through Single Window are included in Annex B: Submitting a response via).

Obtaining information from foreign suppliers to meet the information requirements for substances in imported manufactured items is strongly encouraged; if the information does not appear to be accessible within the reporting period, please contact us at substances@ec.gc.ca to request an extension (see section 5 below).

Declaration of stakeholder interest

If you do not meet the reporting requirements, but you have interest in a reportable substance or have other information that the Government may find useful, you are encouraged to submit a Declaration of Stakeholder Interest (SHI). This may include information on other related substances (not listed in the notice), activity for another calendar year, activity with a reportable substance under the thresholds or other non-reportable activity. This may also include activities that suggest the potential presence of PFAS (e.g., you are uncertain if your imported product contains PFAS). You may also submit an SHI to indicate your interest in these substances.

The following external resources (not generated by the Government of Canada) are partial lists of PFAS that may be of interest to those who want to submit voluntary information beyond the PFAS listed in the notice: the OECD Comprehensive Global Database of PFASs (Fluorinated Chemical (oecd.org)), the US EPA PFASSTRUCT (Chemicals Dashboard (epa.gov)), and the US EPA PRASDEV (Chemicals Dashboard (epa.gov)).

Examples of some information you might submit through an SHI include:

- activity with a reportable substance that did not fall within the 2023 calendar year
- activity with related substances not listed in the notice
- non-reportable activity with reportable substances (e.g., warehousing, exporting, etc.)
- activity with a reportable substance under the threshold
- interest in being engaged on reportable substances

See Annex B: Submitting a response via for more information on how to submit an SHI via Single Window.

Declaration of non-engagement

If you do not meet the reporting requirements and you have no interest in any of the substances, we encourage you to submit a Declaration of Non-Engagement (DNE). You may submit a DNE by emailing substances@ec.gc.ca. Indicate "**PFAS DNE**" in the subject line of the email and specify your company name and its contact information as follows:

> To whom it may concern,
> [Company Name] is hereby submitting a Declaration of Non-Engagement in response to the *Notice with respect to certain per- and polyfluoroalkyl substances (PFAS).*
>
> Canadian head office street address:
> Business Number (Canada Revenue Agency):
> Contact name:
> Title of contact:
> Telephone number:
> Email address:

5 Reporting deadline & extensions

Any person who is required to respond to the notice must do so no later than January 29, 2025 using ECCC's online reporting system. Requests for additional time to respond to the notice must be submitted in writing to substances@ec.gc.ca and must include:

- the organization name;
- contact information;
- substance identifier(s) involved;
- the reason for the request.

You must request an extension of time in writing before the reporting deadline. It is recommended that you request an extension of time at least 5 business days prior to the deadline and include a new proposed date for your submission. Indicate in the subject line of your email "**PFAS Notice Extension Request**". A request for an extension of time submitted after the deadline of January 29, 2025, will not be granted. When making your request, please specify the duration for which you need the extension.

6 Questions

You may contact the Substances Management Information Line at 1-800-567-1999 (toll free in Canada), 819-938-3232 (outside of Canada) or substances@ec.gc.ca for any inquiries concerning the notice. If using email, please indicate "**PFAS Notice Inquiry**" in the subject line.

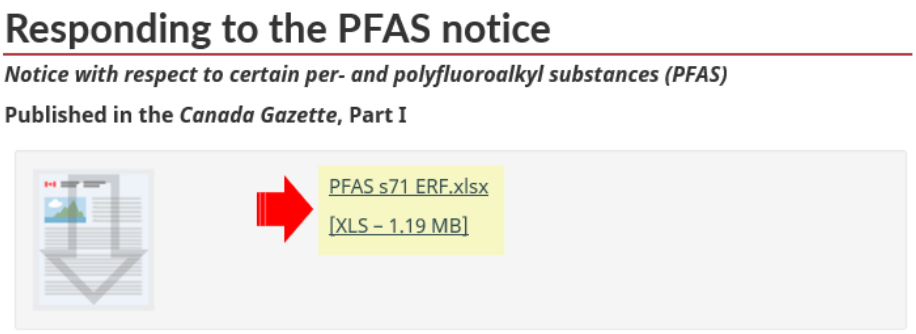
Annex A: How to complete the Excel Reporting File

If you are subject to the notice, you must provide a section 71 response to the Government of Canada. Annex A describes the information required and how to fill out the Excel Reporting File (ERF). Annex B describes how to submit your ERF through Environment and Climate Change Canada's Single Window. If you are providing a response in the form of a Declaration of Stakeholder Interest (SHI), skip to Annex B. If you are providing a response in the form of a Declaration of Non-Engagement (DNE), please submit your DNE via email (see Declaration of Non-Engagement in section 4 of this guidance).

Step 1: Access and download the Excel Reporting File

The ERF has been prepared to assist persons subject to the notice in providing the required information to the Government. To access the ERF:

1) Access the website "**Responding to the PFAS notice**"
2) Download the Excel Reporting File **"PFAS s71 ERF"**



3) Open and Save the ERF as: "**[Organization Name] PFAS s71 ERF.xlsx**"

Step 2: Complete the Excel Reporting File

The ERF has several tabs including an Instructions tab, tabs corresponding to sections of the notice that require information, a completion status tab, and tabs with reference information (Substance List & Codes).

Once each tab is completed, the "Status" column on the far right will confirm if the information has been entered correctly, while error messages are generated if corrections are needed. The "File Status" tab provides feedback to ensure information on all tabs has been entered correctly prior to submission. Details on the information required for each tab are included below. Please read and follow the guidance provided in the Instructions tab to enter information correctly.

Notice section 8 – Company information

8. Any person to whom this notice applies shall provide the following information:

(a) the name of the person;
(b) the address;
(c) the business number (Canada Revenue Agency);
(d) the name, email and phone number of an individual authorized to act on behalf of the person; and
(e) a declaration that the information is accurate and complete.

Information entered in “Section 8” tab includes:

- the name of the person (this refers to the legal business name of your company or organization that is required to respond to the notice)
- the street address, city, province and postal code (of the company or organization that is required to respond to the notice)
- the business number (the 9-digit number assigned to businesses by the Canada Revenue Agency)
- the name, email and phone number of an individual authorized to act on behalf of the respondent (this is generally the person providing the response on behalf of the company or organization)
- a declaration that the information is accurate and complete

This tab also contains “sections applicable” questions. The ERF uses your responses to these questions to determine which of the following tabs you must fill out according to your situation.

You must complete all columns in order for the “Status” column to be complete.

Notice section 9 – Non-listed manufactured items

9. For each substance, the person shall provide the following information for the 2023 calendar year:

(a) Description and common or generic name of each manufactured item containing the substance.

Notice section 9 requires you to provide information relating to manufactured items that are not captured in the listed categories of imported manufactured items. Information to provide includes:

- Substance identifier, if available
- a description and the common or generic name of each manufactured item

The ERF contains a “Substance Lookup” function in the “Section 9” tab. You may search by CAS RN, partial CAS RN, CAN, partial CAN or by keyword. Note, if you search by keyword, that field is case-sensitive. The “Substance Identifier” column’s drop-down options will auto-populate with results that match your search criteria. Once you have selected an identifier, clear the search fields to do a new search.

If you had multiple activities with a reportable substance, you only need to report on imported

manufactured items that are not captured in the listed categories in the "Section 9" tab. For example, if you imported > 100 kg of a reportable substance at a concentration of 1 ppm in a manufactured item that is captured in the listed categories, used a reportable substance to make a good and also imported > 100 kg of a reportable substance at a concentration of 1 ppm in a manufactured item that is not captured in the listed categories, you would report information in notice section 9 only on the manufactured item that is not captured in the listed categories. The two other activities should not be included in notice section 9; instead, they should be reported under notice sections 10-14.

In this tab, enter one row for each combination of substance and good. Only enter the substance identifier in the relevant column if you are certain that it is present in your good. If you do not know the substance identifier of the substance in the good, indicate as such in the Notes column and leave the Substance Identifier column blank. If you are not sure which substance identifier is in your good, indicate your suspected substance identifier in the Notes column and leave the Substance Identifier column blank. If your good contains a substance that is not listed on Schedule 1 of the notice, do not enter this information in the "Section 9" tab; instead, we recommend that you submit this information in a Declaration of Stakeholder Interest.

Notice section 10 – Facility information

10. If the person subject to the notice owns one or more facilities, the person shall provide the following information:

(a) the name and physical address of each facility that has manufacturing or use activity with a reportable substance;
(b) whether there are known releases from the facility of any substance listed in Schedule 1 to air, water or land, by indicating "yes" or "no"; and
(c) a description of any policy or procedure to manage, mitigate or minimize releases from the facility.

Notice section 10 requires you to identify and provide details for each facility that you own that has manufacturing or use activity with a reportable substance, answer yes no questions on releases, and provide a description of release mitigation measures. You do not have to provide information for facilities that have only warehousing or storage activities or are only for retail or distribution activities. Information to provide for each facility includes:

- whether or not you own any Canadian facilities
- the facility name
- the street address, city, province, and postal code of the facility
- identifying releases to air, water or land by indicating "yes" or "no"
- a description of the facility's release mitigation measures

Examples

Example 1: Your company has four facilities in Canada; one facility imports a listed substance and distributes it to the three other facilities where the substance is used to manufacture various products.

Three of the four facilities use the substance in the manufacture of another good, therefore, you are required to provide information for those three facilities. The facilities would be entered into the ERF as follows:

Facility Name	Street Address	City	Province	Postal Code	Are any reportable substances known to be released to air?	Are any reportable substances known to be released to water?	Are any reportable substances known to be released to land?	Description of policy or procedure
Facility 2	234 Facility Road	Toronto	Ontario	T2T 3S3	YES	NO	NO	Scrubbers, thermal oxidizers and bag filters.
Facility 3	567 Example Rue	Montreal	Quebec	Q4Q 5C5	YES	YES	NO	Spill protocol and employee training; primary off-site wastewater treatment equipment systems; scrubbers, thermal oxidizers and bag filters.
Facility 4	890 Draft Ave	Halifax	Nova Scotia	Y6Y J7J	NO	YES	NO	Spill protocol and employee training; primary off-site wastewater treatment equipment systems.

Example 2: Your company is headquartered in an office building to conduct meetings and owns two other facilities in Canada that have activity with a reportable substance. One facility imports and uses 250 g in the manufacture of a good, and the other facility uses 7 grams of the same substance to manufacture another good. Both facilities need to be reported, since they both have “use in the manufacture of a good” activity with a reportable substance. The office building containing the company headquarters does not have manufacturing or use activity with a reportable substance and does not need to be reported under notice section 10.

- Facility 1 and Facility 2 need to be entered in the ERF:

Facility Name	**Street Address**	**City**	**Province**	**Postal Code**	**Are any reportable substances known to be released to air?**	**Are any reportable substances known to be released to water?**	**Are any reportable substances known to be released to land?**	**Description of policy or procedure**
Facility 1	123 Sample Street	Vancouver	British Columbia	X1X 2V2	NO	YES	NO	Collection tanks to capture wash water from the facility’s floors and drains for treatment.
Facility 2	234 Facility Road	Toronto	Ontario	T2T 3S3	NO	YES	NO	Collection tanks to capture wash water from the facility’s floors and drains for treatment.

Notice section 11 – Quantity of substance

11. For each substance, the person shall provide the following information for the 2023 calendar year:

(a) *the total quantity of the substance that the person manufactured, reported in grams or kilograms;*
(b) *the total quantity of the substance that the person imported alone, in a mixture or product, and in a manufactured item, reported in grams or kilograms;*
(c) *the total quantity of the substance that the person used, reported in grams or kilograms; and*
(d) *the total quantity of the substance that the person exported, whether alone, or at a concentration equal to or above 1 ppm in a mixture or in a product, reported in grams or kilograms.*

If you had activity with a reportable substance, you must consolidate information across the entire company and across all facilities for the 2023 calendar year and provide a single response to the notice. When responding to the notice, you must report the quantities of the reportable substance itself, and not the quantity of the mixture, product or manufactured item containing the substance. For each reportable substance, you must enter the total quantity for each activity during the 2023 calendar year. The total quantities entered into the ERF are:

- the total quantity manufactured of the substance itself (this includes both intentional and incidental production of the substance)
- the total quantity of the substance imported alone (i.e., not in a mixture, product or manufactured item)
- the total quantity of substance imported in a mixture or product (e.g., paint, shampoo, polishes)
- the total quantity of the substance imported in a manufactured item (e.g., couch, frying pan, calculator, textile)
- the total quantity of substance used in the manufacture of a good
- the total quantity exported alone, in a mixture or in a product (you are not required to report export quantities of substances in manufactured items)

When filling out the ERF, you must first identify the reportable substance(s) with which you had activity during the 2023 calendar year. The ERF contains a “Substance Lookup” function in the “Section 11” tab. You may search by CAS RN, partial CAS RN, CAN, partial CAN, or by keyword. Note, if you search by keyword, that field is case-sensitive. The “Substance Identifier” column’s drop-down options will auto-populate with results that match your search criteria. Once you have selected an identifier, clear the search fields to do a new search. Once your substance identifiers have been selected, you must fill out three fields associated with each activity: the reporting unit, the quantity and whether the quantity is confidential. You must select grams (g) or kilograms (kg) as your reporting unit, then enter the value associated with the activity. If you did not conduct an activity with that substance in 2023, you may not leave the field blank, instead, select a reporting unit and enter 0 for that activity. The confidentiality field will be automatically populated with “No” as you fill out quantities. If any of your activities are confidential, you may adjust the response by selecting “Yes” with the appropriate CBI justification from the drop-down options. Enter information for one reportable substance per row for all quantities associated with the substance.

The following are some formulas and examples that may help you determine if you meet the reporting criteria and what information you must report.

Formulas

When the substance is alone, the total quantity should be reported in grams or kilograms. Consider the following formulas to convert volume as a liquid into a quantity measured by weight (g or kg):

$$Quantity\ of\ a\ liquid\ (g) = \ volume\ (L) \times density\ (\frac{g}{L})$$

When the substance is present in a mixture, product or manufactured item (i.e., a good), and constitutes a percentage of the final volume or weight, consider the following:

$$Concentration\ (\%)_{(Substance\ A)} = \frac{Quantity\ (g\ or\ kg)_{(Substance\ A)}}{Quantity\ (g\ or\ kg)_{(Good\ X)}} \times 100\%$$

$$Quantity\ (g\ or\ kg)_{(Substance\ A)} = Quantity\ (g\ or\ kg)_{(Good\ X)} \times Concentration\ (\%)_{(Substance\ A)}$$

The total quantity of Substance A must include the quantity of substance present in each good:

$$Total\ Quantity\ (g\ or\ kg)_{(Substance\ A)} = quantity\ in\ Good\ 1 + quantity\ in\ Good\ 2 + [\dots] + quantity\ in\ Good\ 99$$

- where Substance A = any reportable substance listed in Schedule 1 of the notice; Good = any mixture, product or manufactured item containing a reportable substance; concentration = the concentration of the reportable substance by weight (w/w %) in the good

Note, if the substance is present in a manufactured item, the concentration should be based on the component that contains the substance. For example, if the substance is present in the buckles of bags that you imported, the reported concentration should be the concentration of substance in the buckle, not the concentration of the substance in the entire bag.

Examples

Example 1:

In 2023, you imported 200 kg of Mixture X containing Substance A at a concentration of 1% and 300 kg of Product Y containing Substance A at a concentration of 0.5%. You also imported 20 kg of Mixture Z containing Substance A at a concentration of 50%. The total quantity for import is calculated as follows:

$$Total\ quantity_{(Substance\ A)} = (200\ kg \times 1\%) + (300\ kg \times 0.5\%) + (20\ kg \times 50\%)$$

$$Total\ quantity_{(Substance\ A)} = 13.5\ kg$$

Substance A is on Part 1 of Schedule 1 and the threshold for import of a Part 1 substance is > 10 g. You MEET the reporting criteria for import of Substance A. In the "Section 11" tab of the ERF, you will select your reporting units, and report the following values for import:

- Substance A alone – total quantity imported: 0 kg
- Substance A in a mixture or product – total quantity imported: 13.5 kg
- Substance A in a manufactured item – total quantity imported: 0 kg

Adjust the confidentiality responses if necessary. If you had any other activity with Substance A in 2023 (manufactured, used or exported), you must enter those quantities. Enter "0" for other activities if you did not have those activities with Substance A in 2023.

Example 2:

In 2023, you imported 2,000 kg of Mixture A that contained 1% of Substance B. You used 1,000 kg of that mixture to produce a good. Substance B is a Part 3 reportable substance. The total quantities can be calculated as follows:

$$Quantity\ imported_{(Substance\ B)} = 2000\ kg \times 1\% = 20\ kg$$

$$Quantity\ used_{(Substance\ B)} = 1000\ kg \times 1\% = 10\ kg$$

The quantity threshold for *import* of a Part 3 substance is > 100 kg. You do NOT meet the criteria for import of Substance B. However, the quantity threshold for *use* of a Part 3 reportable substance is > 10 g. You do MEET the criteria for *use* of Substance B. Since you meet one of the criteria in notice section 2 for Substance B, you must report all activities you had with that substance. Select your reporting units and enter the following information in the "Section 11" tab of the ERF:

- Substance B alone – total quantity imported: 0 kg
- Substance B in a mixture or product – total quantity imported: 20 kg
- Substance B in a manufactured item – total quantity imported: 0 kg
- Total quantity used: 10 kg

Adjust the confidentiality responses if necessary. Enter "0" for other activities if you did not conduct those activities with Substance B in 2023.

Example 3:

During processing activities in 2023, you used 10 kg of Substance C to manufacture a good, and you incidentally produced a Substance D, which is also a reportable substance. Based on your calculations of the amount of Substance C used in the processing activities and the substances present in the final good, you estimate that approximately 100 g of Substance D was incidentally manufactured in 2023.

Substance C is a Part 1 reportable substance, for which you MEET the reporting criteria of > 10 g for use activity for a Part 1 substance. Substance D is also a Part 1 reportable substance; however, you only manufactured 100 g which does NOT meet the reporting criteria for manufacture of > 1000 g. Select your reporting units and report the following quantities for Substance C:

- Total quantity used: 10 kg

Adjust the confidentiality responses if necessary. Enter "0" for other activities if you did not conduct those activities with Substance C. You do not have to report your manufacturing activity with Substance D, since you did not meet the reporting threshold for that substance.

Example 4:

In 2023, you imported Mixture B to 6 different facilities in Canada. Each shipment contained 200 kg of Mixture B, which contained 0.1% of Substance E. You then used Mixture B (at each facility) in the manufacture of another good. The total amount of Mixture B imported was 1200 kg and the total amount of Substance E imported was 1.2 kg.

Substance E is a Part 2 substance. You do NOT meet the import criteria of > 100 kg for a Part 2 substance; however, you MEET the use criteria of > 10 g for a Part 2 substance. Since you meet one of the criteria in notice section 2 for Substance E, you must report all activities you had with that substance. Select your reporting units and enter the following information in the "Section 11" tab of the ERF:

- Substance E alone – total quantity imported: 0 kg
- Substance E in a mixture or product – total quantity imported: 1.2 kg
- Substance E in a manufactured item – total quantity imported: 0 kg
- Total quantity used: 1.2 kg

Adjust the confidentiality responses if necessary. Enter "0" for other activities if you did not conduct those activities with Substance E.

NOTE: It may be difficult to determine specific quantities of a substance within manufactured items due the variation of items used to assemble or applied to manufactured items. Information provided by suppliers for parts, components, products or mixtures used in manufactured items is essential to generate the information required to respond to the notice.

Notice section 12 – Information on goods

12. For each substance, the person shall provide the following information for the 2023 calendar year:

(a) *the application code(s) set out in Schedule 2 that applies to the substance;*

(b) *the substance function code(s) set out in Schedule 3 that applies to each application code;*

(i) where code U999 is provided pursuant to paragraph 12(b), a written description of the function associated with the substance must be provided;

(c) *for each combination of application code and substance function code(s), provide the following information:*

(i) description and the common or generic name of the goods containing the substance;

(ii) the concentration or range of concentrations of the substance by weight (w/w%) in the goods;

(iii) whether the goods containing the substance were exported by indicating "yes" or "no";

(iv)	*whether the goods are intended for commercial use by indicating "yes" or "no";*
(v)	*whether the goods are intended for consumer use by indicating "yes" or "no"; and*
(vi)	*whether the goods are intended for use by or for children 14 years of age or younger by indicating "yes" or "no".*

Notice section 12 focuses on supplementary information around each reportable substance. For each substance you must provide the following information:

- application code(s)
- substance function code(s)
- 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

Reportable codes

When providing your response to the notice, you must first consider two sets of codes for reporting, application codes and substance function codes. **Application codes** begin with the letter C and are used to identify the application of a substance or good containing a substance, with regards to its purpose in a consumer or commercial setting. These codes also apply to the use of a substance or good for an industrial, professional, institutional, or occupational application.

For example, if the substance is contained in:

- carpeting, then, you should select application code "C101– Floor coverings"
- clothing, then, you must select application code "C104 – Fabric, textile and leather articles not otherwise covered in this table"

Tip: You should only use code C999 when there is no other code that describes the application of the substance.

For example:

- In 2023, your company incidentally manufactured a reportable substance (e.g., Substance A) during the manufacture of a non-reportable substance (e.g., Substance B). The manufacturing process inherently produced Substance B containing a certain concentration of Substance A. Since Substance A was not the intended result, you should select the Application Code "C999 – Other"

Substance function codes, beginning with the letter U, describe the function of a substance. These codes refer to the function of the substance itself with respect to the intended physical or chemical characteristic for which a chemical substance is consumed as a reactant; incorporated into a formulation, mixture, product, or manufactured item; or used.

For example:

- if the function of the substance is to impart stain- or soil-resistance to textiles, you should select the code “U010 – Finishing agents”
- if the function of the substance is to suppress mist in metal plating, you should select the code “U031 – Surface active agents”
- if the presence of a reportable substance in a mixture, product or manufactured item is unintended or incidental, then, you must select the Substance Function Code “U064 – Contaminants”

Tip: You should only use code U999 when there is no other code that describes the function of the substance. When selecting this code, you must provide a concise written description of the substance’s function.

The complete list of application and substance function codes and their descriptions can be found in Schedule 2 and 3 of the notice and in the “Substances & Codes” tab of the ERF. You should select the code(s) that best describe(s) the application and function of the substance. If the substance you have selected has more than one unique combination of application and substance function codes, enter each new combination of application and substance function codes into a new row.

The ERF allows you to easily search the list of codes to help you pick the most appropriate one. In the “Section 12” tab of the ERF, the drop-down arrow in column A, “Substance Identifier”, will be limited to only the substances that were identified in the “Section 11” tab. If there are substances missing from the “Section 12” tab, double-check that all the correct substances were entered in the “Section 11” tab. Once you have selected a substance from the drop-down options, select the appropriate application code from the drop-down options in column B. Column C, “Application code is confidential?”, will automatically pre-populate with the answer “No”. Use the drop-down arrow to modify your response, if necessary. In column D, “MAIN substance function code”, use the drop-down options to select the appropriate substance function code. If the substance has more than one function associated with the selected application code, use the column “Other substance function code(s)” to enter any additional codes.

Description, concentration, export and intended use

For each combination of application and substance function code(s), you must provide the description of the good, the common or generic name of the goods containing the substance, the concentration, whether it was exported, and whether the goods are intended for commercial use, consumer use or for use by or for children 14 years of age or younger.

The “Description and the common or generic name of the good containing the substance” column in the ERF is a free text box with a corresponding confidentiality question. Enter as much detail as possible to accurately describe the good, along with its common or generic name (e.g., household cleaning spray product, glass / porcelain cleaner). The concentration is reported as a weight percentage (w/w%) and can be reported with up to 4-decimal precision. The concentration may be reported as an exact value by entering the same value in the “Concentration […] – lower end” column and the “Concentration […] – upper end” column. If the concentration is a range or if you do not know the concentration of the substance in the good, even after making reasonable efforts to obtain the data, you may indicate in the ERF (in the “Notes” field) that the range provided is a best estimate or you may indicate that the concentration is not reasonably accessible.

To indicate whether the goods containing the substances are intended to be exported, are for commercial or consumer use, or are intended to be used by children, simply select “Yes” or “No” for each of the fields.

Examples

Company A uses a reportable substance in the manufacture of all-purpose household cleaning products:

- Application code: *C105 – Cleaning and furnishing care*
- Main substance function code: *U029 – Solvents (for cleaning or degreasing)*
- Description and common or generic name of the good containing the substance: A*ll-purpose household cleaning product; Superior ABC all-purpose cleaner*
- Concentration in good containing the substance: *10-15%*
- Whether good containing the substance was exported: *No*
- Whether the goods are intended for commercial use: *Yes*
- Whether the goods are intended for consumer use: *Yes*
- Whether the goods are intended for use by or for children 14 years of age or younger: *No*

Company B imports children’s toys for retail purposes:

- Application code: *C304 – Toys, playground and sporting equipment*
- Main substance function code: *U022 – Plasticizers*
- Description and common or generic name of the good containing the substance: *Toy rattle; ABC kids toy rattle*
- Concentration in good containing the substance: *0.1%*
- Whether good containing the substance was exported: *Yes*
- Whether the goods are intended for commercial use: *No*
- Whether the goods are intended for consumer use: *Yes*
- Whether the goods are intended for use by or for children 14 years of age or younger: *Yes*

Company C imports a mixture containing a reportable substance to use in the manufacture of a waterproofing spray:

- Application code: *C104 – Fabric, textile and leather articles not otherwise covered in this table*
- Main substance function code: *U010 Finishing agent*
- Description and common or generic name of the good containing the substance: *Waterproofing sealant; XYZ Waterproofing spray*
- Concentration in good containing the substance: 1%
- Whether good containing the substance was exported: *No*
- Whether the goods are intended for commercial use: *Yes*
- Whether the goods are intended for consumer use: *Yes*
- Whether the goods are intended for use by or for children 14 years of age or younger: *No*

Notice section 13 - Technical Data

13. For each substance listed under Part 2 of Schedule 1, the person shall provide the following technical data, if available:

(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).*

For each reportable substance, the person required to report should provide available technical data. No testing is required to generate the data, but if you have access to reports, testing results, or if information is available from suppliers, it should be provided. You should submit supporting analytical data and methods, including, but not limited to: gel permeation chromatography (GPC) chromatograms, spectral analyses, such as C- or H-nuclear magnetic resonance (NMR) spectra or mass spectra (MS), or viscosity measurements.

Note: In cases where supporting analytical data have not been provided, the Minister may contact your company for follow-up information.

For each requirement in this section, you must indicate whether you will input data directly in the ERF, upload separate documents, or both. Or you may indicate that the information is not reasonably accessible. If you choose to upload documents, you must provide the title of the data or study as well as the name of the file uploaded, including extension types (e.g. .docx, .pdf, .xlsx) in the “Section 13 & 14 Files” tab of the ERF. For example, the following information should be reported in the ERF for an acute toxicity study:

Title of study: A 48-hour flow-through acute toxicity test with Daphnia magna
File name: acute toxicity test Daphnia magna 2011.pdf

Documents may be uploaded along with the completed ERF in Single Window when submitting your section 71 response.

If you choose to enter information in the ERF, enter your information in the appropriate columns.

Similar to the “Section 12” tab, the drop-down arrow in column A, “Substance Identifier”, will be limited to the Part 2 substances that were identified in the “Section 11” tab. If there are substances missing from the “Section 13(a)(b)(c)” tab, double-check that all the correct Part 2 substances were entered in the “Section 11” tab.

Molecular Weight Distribution

When reporting on molecular weight distribution, attach any available information, including information regarding the methodology, and molecular weight distribution charts and any other supporting analysis information. If you chose to enter information in the ERF, provide as much information as possible such as a range, number average, and weight average with the appropriate units. Please specify the kind of average molecular weight used, if available. Information on low molecular weight content should also be provided, if available; for instance, the percentage of all residual constituents having molecular weight less than 500 Daltons or those having molecular weight less than 1000 Daltons.

Example 1:

Company A has access to a molecular weight distribution including number average and weight average molecular weight, and information on low molecular weight residual constituents.

Substance identifier	Molecular weight distribution	Reporting unit
Substance X	Mn = 10 000 Mw = 12 000 %<1000 Da = 6 %<500 Da = 2	Da

Company A should attach information regarding the methodology, and molecular weight distribution charts and any other supporting analysis information.

Example 2:

Company B has been provided a data sheet from their supplier that has the number average molecular weight and the weight average molecular weight of the substance.

Substance identifier	Molecular weight distribution	Reporting unit
Substance Z	Mn = 8000 Mw = 9000	Da

Company B should attach any data sheets from the supplier.

Structural Formula

The company should provide a structural formula of the polymer with the repeat units and chain-end groups shown. If providing a structural diagram, it should indicate the identity of the atoms and the nature of the bonds joining them. Common abbreviations are acceptable in structural diagrams. You may also attach a file including an image of a chemical structure in the "Section 13 & 14 Files" tab of the ERF. The structural diagram may be generated by computer program or by hand.

Example 1:

Company A is providing the structural formula for Substance X, in the form of a polymer structure with repeat units and chain-end groups.

Substance identifier	Structural formula
Substance X	$HO–[CF(Cl)–CF_2]_n–OH$

Degradation, Depolymerization & Decomposition

If the company has any information on the conditions under which the polymers degrade, depolymerize, or decompose; or are expected to degrade, depolymerize, or decompose; and the known or potential degradation products, you should provide a brief description of the conditions and the resulting product(s) in the ERF. Any reports, data, or technical information should be attached to the submission.

Example 2:
Company C has results of a thermogravimetric analysis (TGA) showing that the polymer begins to decompose at 280°C.

Substance identifier	Expected conditions resulting in the degradation, depolymerization or decomposition of the polymer	Identification of decomposition products
Substance Y	Initial decomposition begins at 280°C. Significant	Substance A and Substance B

	decomposition begins at 310°C.	

Company C should attach information regarding the methodology, outputs and other supporting analysis information.

Monomers

If available, provide the CAS RN and name of each monomer that is part of the polymer. If you are providing this information in the ERF, use one row for each monomer. Note that the substance identifier in column A represents the substance identifier of the polymer that is listed in Part 2 of Schedule 1. As such, the same substance identifier for the polymer may appear multiple times in column A if it has multiple monomers. If the monomer concentration is reported as a single value and not a range, the same number should be used for the lower end and upper end. If your concentration is not by weight, indicate that it is not reasonably accessible. You can enter a concentration with a different format in the Notes column or upload it in a separate file. If uploading a separate file, indicate this in the Notes column and ensure you enter the relevant details in the “Section 13 & 14 Files” tab.

Example:

Substance identifier	**CAS RN of monomer**	**Monomer name**	**Concentration or range of concentrations of the monomer by weight (w/w%) that becomes part of the polymer – lower end**	**Concentration or range of concentrations of the monomer by weight (w/w%) that becomes part of the polymer – upper end**
123-45-6	111-11-1	Monomer A	70	75
123-45-6	222-22-2	Monomer B	10	10
123-45-6	333-33-3	Monomer C	15	20

Notice section 14 – Other Available Studies or Data

If you have any other data or studies for any of the substances listed in Part 2 of Schedule 1, you are required to provide the title(s) of the data or studies that are in your possession and that have not already been provided to the Government of Canada under the *New Substances Notification Regulations (Chemicals and Polymers)* or under section 70 of the Act.

You must provide in the ERF the title of the data or study as well as the name of the file uploaded, including extension types (e.g. .docx, .pdf, .xlsx). Documents may be uploaded along with the completed ERF in Single Window when submitting your section 71 response.

Example:

Title of the data or study provided	File Name
48 Hour Acute Toxicity Test with Daphnia magna	acute toxicity test Daphnia magna 2011.pdf
In vitro mutagenicity assay	In vitro mutagenicity assay.docx

Full data or studies are not being requested at this time, but the Minister may request the information as a follow up to the submission.

NOTE: If the title of your data or study is in a language other than English or French, it can still be submitted.

Status: Complete

Once you are finished filling out the ERF, click on the "Status" tab and confirm that the "File Completion" status says "Complete". If it says "Incomplete", check "2. Tab Status" and "3. Overall Substance Completion" to determine where the incomplete sections are located. Once you have confirmed that all sections are complete, ensure your file is saved with the following naming format: **"[Organization name] PFAS s71 ERF.xlsx**". Follow the steps in Annex B to submit your completed ERF through Environment and Climate Change Canada's Single Window.

Annex B: Submitting a response via Single Window

There are three ways you can respond to a section 71 notice. You may submit a section 71 response, a Declaration of Stakeholder Interest (SHI) or a Declaration of Non-Engagement (DNE).

If you are providing a section 71 response or an SHI, you must submit your information using Environment and Climate Change Canada's online reporting system: Single Window. If you are submitting a DNE, you may submit it via email to the Substances Management Information Line (substances@ec.gc.ca). To create and manage a Single Window account and for general information on how to submit a response, refer to these guides:

How to use Single Window: guidance - Canada.ca

Single window for online CEPA s.71 submissions - How-to guide - Canada.ca.

The specific instructions on how to respond to the PFAS section 71 notice are found below:

1) Follow the instructions in section 8 of the Single window for online CEPA s.71 submissions – How-to Guide webpage (referred to as the "How-to guide").
2) On the "Information to Report" page, choose "**s.71 PFAS 2024**" or "**SHI PFAS 2024**" as the "Submission Purpose".
3) Following section 8.2.2 of the "How-to guide", enter "**PFAS**" as the "Submission Title", and then click "Save".
4) Following section 8.2.3 of the "How-to guide", add your completed ERF and any other documents associated with your response, on the "General Document Upload" page:
    a. **For a section 71 response**: ensure your completed ERF is saved using the following format: "**[ORGANIZATION NAME] PFAS s71 ERF.xlsx**". The ORGANIZATION NAME should be identical to the "Business legal name" entered in the ERF and to the "Company Name" listed on the "Identification" page of your CM-General form.
    b. **For an SHI**: under the "Notes" box, indicate the substance identifier(s) from the notice and provide any other relevant documents or information such as activity during another calendar year, activity with related substances not listed in the notice, activity with a reportable substance under the threshold or non-reportable activities.
5) Follow section 6 of the "How-to guide" to submit your form.

You can save the CM-General form at any stage in the process and return later to complete and submit. Additionally, it is possible to amend a CM-General form once submitted. We strongly recommend that you retain a copy of all documents that you submit.