

## Summary of Reporting Requirement Changes due to the CDR Revisions and Small Manufacturing Definition Update Rules

This table presents a summary of changes to the CDR requirements resulting from the March 2020 publication of the CDR Revisions Rule and the May 2020 finalization of the Small Manufacturing Definition Update Rule. In addition, EPA extended the submission period for 2020, resulting in a submission period of June 1, 2020, to November 30, 2020.

[Read about the CDR Revisions Rule.](#)

<b>CDR: What Has Changed for the 2020 Reporting Requirements</b>	
Confidentiality Claims (40 CFR 711.30)	Upfront substantiation is required for most confidentiality claims. Information submitted under CDR generally may be claimed as confidential; exceptions are listed in 40 CFR 711.30(a)(2). Such claims must be made upfront, at the time of submission, and substantiated in accordance with TSCA and the CDR rule. Submitters must provide upfront substantiation of all confidentiality claims except for claims for certain limited data elements, described in 40 CFR 711.30(a)(3). See 40 CFR 711.30 for the specific questions to answer to complete a substantiation. These questions are included in the electronic reporting tool (e-CDRweb) and in the 2020 Instructions for Reporting.
Small Manufacturer and Small Government Definitions (40 CFR 704.3)	EPA finalized changes to the small manufacturer definition and the addition of a small government definition. Manufacturers meeting the small manufacturer or small government definition have no or reduced reporting obligations under CDR, unless the manufactured (including imported) <a href="#">chemical is the subject of certain TSCA actions</a> .
Site Identification Information (40 CFR 711.15)	<ul style="list-style-type: none"> <li>• Report your highest-level foreign parent company, if applicable, in addition to your highest-level domestic parent company. <a href="#">See the new definition for highest-level parent company</a>.</li> <li>• Provide the applicable NAICS code for your reporting site. One NAICS code is required; up to three NAICS codes may be reported.</li> </ul>

<p>Manufacturing Information (40 CFR 711.15)</p>	<ul style="list-style-type: none"> <li>• Indicate whether your reported chemical is recycled or otherwise used instead of being disposed of as a waste or included in a waste stream. This requirement replaces the need to indicate whether a chemical is recycled, remanufactured, reprocessed, reused, recycled, or otherwise used instead of being disposed of as a waste or included in a waste stream. (Revised requirement)</li> <li>• As a voluntary data element, report the percent production volume of your chemical substance that is a byproduct.</li> <li>• For joint submissions: The secondary submitter of a joint submission reports the chemical specific function along with the chemical composition of the imported product.</li> </ul>
<p>Industrial Processing and Use (40 CFR 711.15)</p>	<ul style="list-style-type: none"> <li>• The industrial function codes and consumer/commercial product codes have been updated based on OECD Internationally Harmonized Functional, Product, and Article Use Categories. Manufacturers (including importers) of the chemicals listed in Table 9 at 40 CFR 711.15 (the 20 chemical substances designated as high priority for risk evaluation in December 2019) are required to use the updated codes in 2020 CDR submissions. Manufacturers (including importers) of chemicals not listed in Table 9 may report using either the updated codes or the pre-existing CDR codes (i.e., the codes used for 2016 CDR submissions).</li> <li>• All manufacturers (including importers) are required to use the updated codes in 2024 CDR submissions.</li> <li>• When reporting a consumer or commercial use, also report the function of the chemical in that use.</li> </ul>
<p>Reporting Process for Co-manufactured Chemicals (40 CFR 711.22)</p>	<ul style="list-style-type: none"> <li>• The contracting company can initiate the reporting of a co-manufactured chemical by sending an alert using eCDRweb to the producing company; each party then completes their respective portions of the chemical report.</li> <li>• The producing company can report the co-manufactured chemical, with written agreement and assistance, if needed, from the contracting company.</li> </ul>

Reporting of Byproducts (40 CFR 711.10)	<ul style="list-style-type: none"><li>• Addition of two new reporting exemptions for byproducts:<ol style="list-style-type: none"><li>1. For specifically identified byproducts that are recycled in a site-limited, enclosed system:<ol style="list-style-type: none"><li>a. Portland Cement Manufacturing (i.e., CASRN 68475-76-3, Flue dust, portland cement)</li><li>b. Kraft Pulping Process (i.e., CASRN 66071-92-9, Sulfite liquors and Cooking liquors, spent; CASRN 68514-09-0, Sulfite liquors and Cooking liquors, spent, oxidized; and CASRN 471-34-1, Carbonic acid calcium salt (1:1)).</li></ol></li><li>2. For byproducts that are manufactured as part of non-integral pollution control and boiler equipment.</li></ol></li><li>• Byproducts that meet either exemption 1 or exemption 2 are exempted from the need to be reported.</li></ul>
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