

# Minnesota Aims for Fall 2025 Release of PFAS Reporting System

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As Maine struggles to develop a reporting system in the wake of the legislature's [overhaul of the Pine Tree State's](#) PFAS reporting requirements, the Minnesota Pollution Control Agency ("MPCA") announced that it aims to begin beta testing its PFAS reporting system in Fall 2025. MPCA furthered that they hope the system will be operational by the end of next year.

Under [HF2310](#) (also referred to as "Amara's Law"), manufacturers of products containing PFAS are subject to Minnesota PFAS disclosure requirements. To comply, companies must submit information to MPCA including: a brief description of the product, including a universal product code ("UPC"), stock keeping unit ("SKU"), or other numeric code assigned to the product; the purpose for which PFAS are used in the product, including in any product components; the amount of each PFAS, identified by its CASRN, in the product; the name and address of the manufacturer and the name, address, and phone number of a contact person for the manufacturer; and any additional information requested by the Agency. Similar reporting requirements are also common under other state PFAS statutes like Maine and Washington. Minnesota's reports are due in January 2026.

During a July 18 MPCA webinar, Agency staff indicated that the state's reporting system will heavily borrow from the existing [High Priority Chemicals Data System](#) model that is part of the [Interstate Chemicals Clearinghouse](#). MPCA is crafting this system in conjunction with the Northeast Waste Management Officials Association, which last year developed [draft model state PFAS legislation](#). The legislation offers a menu of policy options for state legislatures to address potential PFAS contamination and exposure from consumer products, like a near-total ban on PFAS-containing consumer products within three years, product reporting requirements, "extended producer responsibility" obligations (*i.e.*, product "take back"/recycling programs), and, relevant here, the new multi-jurisdictional "clearinghouse" to assist state environmental agencies with compliance and enforcement of Amara's Law and others like it.

Speaking broadly, manufacturers are growing increasingly concerned that publicly-accessible PFAS disclosures are going to be used by plaintiffs' attorneys who will bring false advertising claims against them. Just last month, a proposed class action lawsuit was filed in a California federal court claiming that a razor company's products contained PFAS and that the plaintiffs would not have purchased the product had they known PFAS were present. The information regarding the products' PFAS content was discovered via publicly accessible company disclosures filed under the Maine PFAS reporting requirement prior to the law's amendments.

The case is truly groundbreaking – never before have we seen a case where state-mandated PFAS disclosures have led to allegations of false advertising. Testing ground or not, the case is likely one

of many to come as law firms opportunistically scan the environment for cases and plaintiffs.

Turning back to Minnesota, MPCA staff also shared that the Agency expects to finalize draft rules related to associated fee structures and related documents by October of this year.

Amara's Law also prohibits a person from selling, offering for sale, or distributing for sale carpets or rugs; cleaning products; cookware; cosmetics; dental floss; fabric treatments; juvenile products; menstruation products; textile furnishings; ski wax; or upholstered furniture, if they contain intentionally added PFAS, beginning January 1, 2025. Beginning January 1, 2032, all products containing PFAS are banned, unless MPCA determines, by rule, that the specific products or product categories constitute a "currently unavoidable use." Deliberations on what constitutes a "currently unavoidable use" are [ongoing](#), though a draft rule is likely to be promulgated sometime this year.

As is evident, Minnesota's PFAS reporting requirements diverges from other states with similar requirements like [Maine](#), [Rhode Island](#), [New York](#), and [Washington](#), creating a complicated landscape for businesses and organizations navigating compliance. This discrepancy will likely lead to considerable confusion for entities that must adhere to dueling sets of regulations. Organizations will need to manage dual reporting systems, each with its own rules and deadlines, complicating compliance efforts and undoubtedly increasing operational costs.