

Minnesota Finalizes PFAS Reporting System

Joseph J. Green, Dennis Mema

December 16, 2025

On December 8, 2025, the Minnesota Pollution Control Agency (“MPCA” or “the Agency”) [published its final rule](#) implementing the state’s comprehensive PFAS reporting program. This marks the culmination of a two-year rulemaking process stemming from the state’s sweeping PFAS mitigation and disclosure law, HF2310, also known as “Amara’s Law.”

Refresher on Amara’s Law

Amara’s Law requires manufacturers of products containing intentionally added PFAS to report detailed information to the Agency by July 1, 2026 (six months later than originally planned). Manufacturers (or groups of manufacturers within the same supply chain seeking to consolidate reporting responsibilities) must submit reports for “each product or component that contains intentionally added PFAS.” Reports will include:

- 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 Chemical Abstracts Service Registry Number (“CASRN”), in the product, reported as an exact quantity “determined using commercially available analytical methods” or as falling within a range approved for reporting purposes. Notably, if the amount of each PFAS is not available, the rule would allow reporting based on testing for total organic fluorine (“TOF”) (a relatively cheaper option than testing for individual PFAS and an effective screening test, though an overbroad one in that it captures fluorine from sources other than PFAS);
- Manufacturer identification information, including the name, address, and phone number of a manufacturer representative; and
- Any additional information requested by the Agency.

Reporting will occur on MPCA’s newly-created reporting system, the PFAS Reporting Information System for Manufacturers (“PRISM”), which will be available for all manufacturers in January 2026. PRISM is modeled on the Interstate Chemicals Clearinghouse’s High Priority Chemicals Data System and may help manufacturers meet reporting requirements in other states. Non-confidential data will be published on an ongoing basis after MPCA review.

In comparison to the federal PFAS reporting program administered by the Environmental Protection Agency (“EPA”) under the Toxic Substances Control Act (“TSCA”), Minnesota’s program is generally

seen as a stricter and more compliance-heavy program. For one, Minnesota defines PFAS more broadly than the Environmental Protection Agency (“EPA”) does under the Toxic Substances Control Act (“TSCA”) Section 8(a)(7), making their rule apply to a broader range of chemicals. Second, Unlike EPA’s rule, which focuses on historical PFAS uses from 2011 to 2022, Minnesota’s program targets current and future uses of the chemicals. Further, the final rule retained the industry-criticized “strict ‘due diligence’ reporting standard,” which requires manufacturers to collect information from their supply chains “until all required information is known.” In contrast, the EPA’s own PFAS reporting rule requires manufacturers to gather information “known to or reasonably ascertainable” to the manufacturer.

Key Changes in the Final Rule

The final rule incorporates a number of revisions required after an administrative law judge flagged procedural and substantive defects in the proposed rule and its fee structure earlier this year. The original proposed rule would have charged manufacturers \$1,000 to file their initial report, and \$500 to file any updates, and \$500 for each (required) annual recertification, the revenue from which would have vastly exceeded the costs to implement the law. The final rule changed this structure, and the state will now collect \$800 for the initial report fee, with no costs for filing updates and no more annual recertifications.

Beyond the fee structure changes, the final rule included an assessment of the cumulative effects of Minnesota’s program, in addition to federal and state reporting requirements. MPCA also introduced some flexibility for manufacturers reporting under the rule by adding group reporting options, allowing PFAS concentration to be reported as ranges instead of exact amounts, and adding processes for waivers, extensions, and trade secret requests.

While the final rule represents an improvement over the initial proposal in terms of compliance obligations, Amara’s Law is nonetheless a new piece of the ever-evolving patchwork of state and federal PFAS reporting obligations for manufacturers. If you have questions about the final rule’s implications for your company’s processes, feel free to reach out to us directly.

To read our prior discussions on Minnesota’s legislative and regulatory action on PFAS, see [here](#) and [here](#).