



# Minnesota Finalizes Jan. 1, 2026, PFAS Reporting Requirement, Impacting Manufacturers of Complex Products

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The Minnesota Pollution Control Agency (MPCA) adopted on **December 8, 2025**, a final rule regarding the reporting of per- and polyfluoroalkyl substances (PFAS) in products,<sup>1</sup> which is set to impose significant new compliance obligations on manufacturers. This rule, codified under Chapter 7026 of Minnesota Rules, establishes reporting requirements and associated fees for products that are sold, offered for sale, or distributed in the state. The rule applies broadly to any product that contains intentionally added PFAS and its constituent components. Whereas the federal PFAS Reporting Rule is currently being revised to lessen burdens on industry, Minnesota is charging forward with what are objectively highly burdensome reporting requirements.

## Reporting Obligations and Fees

Under the finalized rule, a manufacturer—defined as “the person that creates or produces a product or whose brand name is affixed to the product”—must submit a report to the commissioner for each product or component that contains intentionally added PFAS. The crucial deadline for the initial report covering existing products with intentionally added PFAS is **January 1, 2026**. For new products introduced after that date, a report must be submitted by February 1 of the following year.

The final rule requires manufacturers to report each product or component individually through an MPCA portal.<sup>2</sup> The required report must contain comprehensive chemical and product data. Manufacturers must provide the chemical name and the Chemical Abstracts Service Registry number (CASRN) or another chemical identifying number for the specific or unique PFAS used. Further, the concentration of PFAS chemicals in homogeneous material must be reported within specific ranges, such as 100 parts per million (ppm) to <1,000 ppm, or 90 to 100 percent. Manufacturers must also specify the *function* or explicit purpose served by the PFAS chemical when it was intentionally incorporated into the product or its components.

To ensure compliance, manufacturers must adhere to a schedule of submissions and fees. Submitting the initial report requires a \$800 flat fee per manufacturer. Failure to submit the required reports or pay the applicable fees subjects noncompliant manufacturers to penalties under Minnesota Statutes, Section 116.072.

<sup>1</sup> This reporting rule is separate from Minnesota's Amara's Law, which restricts or prohibits the sale of certain PFAS-containing products in Minnesota. See Minn. Stat. § 116.943.

<sup>2</sup> Review the complete list of required information under Minn. R. ch. 7026.0030. MPCA has posted this link.

## Implications

The immediate challenge for manufacturers of complex equipment like automotive and engine components lies in the requirement for component-level reporting. A component is defined as “a distinct and identifiable element or constituent of a product.” For industries assembling products from a vast number of parts, the component-level reporting may simply be impossible, not just unworkable. While manufacturers may group similar products or components if they share the same PFAS chemical composition, function, and concentration ranges, the requirement to track intentionally added PFAS across all components remains highly burdensome.

There may be some opportunities for obtaining relief. Given the potential significant compliance difficulties, manufacturers can petition the MPCA for an exemption. The MPCA is currently entertaining industry-wide exemptions, and manufacturers are urged to engage in this process. For instance, some industry sectors are actively seeking a Currently Unavoidable Use (CUU) exemption since PFAS are required for durability, safety, and compliance with harsh operating conditions. Manufacturers who rely on PFAS for critical performance in engines or vehicles should evaluate pursuing a similar exemption strategy for their products.

## For More Information

For further information or assistance, contact [Britt Speyer Fleming](#), [Dana Stotsky](#), [Benjamin Schultz](#) or any member of Van Ness Feldman’s Environmental practice group.

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