mema.
The Vehicle Suppliers Association

March 3, 2025
Minnesota House of Representatives
658 Cedar St.
Saint Paul, MN 55155

RE: H.F. 1627–Commercial and industrial products exempted from PFAS restrictions, and PFAS reporting requirements modified.

To whom it may concern,

MEMA, The Vehicle Suppliers Association, submits the following written testimony to the Environment and Natural Resources Finance and Policy Committee in support of H.F. 1627-Commercial and industrial products exempted from PFAS restrictions, and PFAS reporting requirements modified.

MEMA is the leading trade association in North America for vehicle suppliers, parts manufacturers, and remanufacturers. It has been the voice of the vehicle supplier industry since 1904. Automotive and commercial vehicle suppliers are the largest employer of manufacturing jobs in the United States employing over 900,000 people throughout the country. Direct, indirect, and induced vehicle supplier employment accounts for over 4.8 million U.S. jobs and contributes 2.5 percent to U.S. GDP.

Suppliers lead the way in new vehicle innovations. Member companies conceive, design, and manufacture the OE systems and technologies that make up two-thirds of the value of every new vehicle and supply the automotive aftermarket with the parts that keep millions of vehicles on the road, fueling international commerce and meeting society's transportation needs. MEMA members are committed to safety and sustainability.

Vehicle suppliers play a crucial role as the innovators and manufacturers of a multitude of technologies and wide range of components, systems, and materials that improve vehicle safety, emissions, and efficiency. PFAS play a crucial role in allowing vehicle suppliers to meet these safety and sustainability goals. The industry seeks to minimize the use of PFAS where possible, but for many components there are no currently available substitutes.

Motor vehicles are composed of about 30,000 parts, each critical to the safe and efficient function of the vehicle[1]. These parts and components are manufactured by suppliers for use in all vehicles on the road. This includes new motor vehicles as well as the aftermarket components necessary for the repair and maintenance of the existing fleet. The sheer number of parts illustrates the unique challenges of the supplier industry as it conducts the necessary research, development and safety certifications.

[1] Sabhadiya, Jingesh *"40 Basic Parts of a Car."* February 2021

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The Vehicle Suppliers Association

PFAS are critical to the production of motor vehicle parts and components and are therefore essential for the functioning of society. PFAS are extremely durable and can withstand extreme use and high temperature applications- all qualities that are necessary for automotive uses.

MEMA strongly supports the proposed changes to Minnesota Statutes 2024, section 116.943, subdivisions 1, 2 as outlined in MN H.F. 1627. The proposed changes would ensure that the statute focuses on products with personal or residential use, rather than commercial and industrial uses. PFAS regulations should employ a risk-based approach and target the chemicals that present the largest risk of hazard with the highest rates of exposure in consumer applications.

The automotive industry has a demonstrated history of transparency with regards to the use of materials in manufacturing. The creation and maintenance of the International Material Data System (IMDS) is an example of the long-standing commitment made by vehicle manufacturers and suppliers. The system allows the materials being used to be collected, maintained, analyzed, and archived. PFAS are slowly being added to the Global Automotive Declarable Substance List (GADSL). Due to the automotive industry's dedication to transparency and the essential nature of its products, MEMA supports the proposed change to the definition of a product to exclude commercial and industrial uses.

Many of the PFAS used in automotive parts are fluoropolymers, which are non-toxic, stable, and non-bio accumulative. This distinction demonstrates that within the larger class of PFAS, there are varying levels of risk posed by different chemicals, and by application. MEMA is supportive of a regulatory approach that recognizes this differentiation and focuses on the highest rates of exposure in consumer application. By limiting the definition a product to personal or residential uses, H.F. 1627 takes a risk-based approach.

MEMA is also supportive of the proposed extension for the reporting requirement. With only nine months until reporting begins, there is still no final rule that will dictate the reporting process. Vehicle suppliers are anticipating copious amounts of reporting to comply with the statute as written and need the certainty of a final rule in order to prepare. Additionally, it is critical that the reporting tool is accessible to entities well in advance of reporting deadline. Providing a two year extension will allow the Minnesota Pollution Control Agency to complete its rulemaking and develop the reporting tool and give manufacturers the necessary lead time to prepare.

Motor vehicle uses of PFAS are essential to health, safety, and the functioning of society. MEMA supports H.F. 1627, as it takes a risk-based approach by targeting personal and residential products. MEMA appreciates the opportunity to submit this written testimony as the Committee considers H.F. 1627. For more information or questions, please contact Emily Sobel, senior manager of regulatory policy at esobel@mema.org.

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The Vehicle Suppliers Association

Sincerely,

Ana Meuwissen

Senior Vice President, Government Relations

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Association of Equipment Manufacturers

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March 3, 2025

Representative Josh Heintzeman
Chair
Committee on Environment and Natural Resources Finance and Policy
75 Rev. Dr. Martin Luther King Jr. Boulevard
St Paul, MN 55155

RE: Support - HF 1627 (PFAS Chemicals)

Dear Chair Heintzeman and Members of the Committee on Environment and Natural Resources Finance and Policy,

The Association of Equipment Manufacturers appreciates the opportunity to provide the following comments on HF 1627 ahead of Tuesday's hearing in the Minnesota House Committee on Environment and Natural Resources Finance and Policy.

The Association of Equipment Manufacturers is the North American-based international trade group representing off-road equipment manufacturers and suppliers with 1,100 member companies and more than 200 product lines in the agriculture and construction-related industry sectors worldwide. Our industry supports over 78,000 jobs throughout the state of Minnesota and contributes roughly $10.5 billion to the state economy every year.

The Association of Equipment Manufacturers (AEM) ***supports*** HF 1627. AEM recognizes interest in managing PFAS contamination to protect the health of the state's citizens and the environment. HF 1627 makes the necessary changes to current law that would address concerns with PFAS chemistries while allowing critically important uses and benefits of these chemistries in commercial and industrial products.

We therefore respectfully urge you to ***support*** HF 1627.

The Association of Equipment Manufacturers (AEM) appreciates the importance of identifying and addressing the risks associated with heavy-duty, non-road equipment, whether from operator safety concerns, engine emissions, or chemical management issues. Original Equipment Manufacturers (OEMs) design products to satisfy various safety, regulatory, durability, quality, and customer requirements to effectively operate in various extreme and demanding environments with lifespans measured in decades. OEMs utilize a mixture of old and new technologies to meet their company goals, with Per- and Polyfluoroalkyl Substances (PFAS) performing a variety of essential use functions to help achieve success. Some of these applications of PFAS in the heavy-duty, non-road equipment industry include, but are not limited to; coatings and sealings, hoses, hydraulic systems, and alternate power. It is crucial to understand, that without the functionality provided by certain PFAS chemicals,

the introduction of future nonroad products able to meet air quality, climate, safety, durability, waste, sustainability, and alternative power goals will be impossible.

The equipment manufacturing industry design their products to operate with very long lifetimes, utilizing end-of-life design provisions to ensure waste products do not find their way into landfills, water bodies, or the atmosphere. Unlike many consumer applications, our equipment is designed to ensure products are responsibly remanufactured following their useful life, and that used oil and fluid wastes are properly captured and recycled. These widespread industry practices help promote circular economy principles and prevent releases of unwanted pollutants to the environment. AEM and its members unequivocally support intelligently designed laws and regulations that mitigate the hazards from high-risk sources of PFAS pollution, including spill prevention requirements, proper waste handling procedures, and requirements to prevent fugitive emissions and effluent discharges.

AEM also strongly endorses efforts to provide enough time for equipment manufacturers to manage new regulatory requirements placed on the use of select PFAS in the manufacturing environment. HF 1627 would enable greater compliance with the law by providing companies with a two year extension of the deadline for reporting of products containing intentionally added PFASA two year extension of the reporting requirement date would allow manufacturers to work through reporting issues that continue to arise and deepen collaboration with industry stakeholders to realize meaningful and achievable outcomes.

Equipment manufacturers recognize the importance of identifying and addressing the risks associated with heavy-duty, non-road equipment, whether from operator safety concerns, engine emissions, or chemical management issues. AEM encourages support of HF 1627 and is committed to addressing these issues by serving as a catalyst for innovation and working to educate the public and policymakers on the proactive solutions equipment manufacturers are putting into place to protect public health and the environment.

We appreciate the opportunity to provide these comments and encourage you to contact us should you wish to discuss any part of this submission.

Sincerely,

Nicholas Rudowich
Director, State Affairs
Association of Equipment Manufacturers (AEM)

Cc: Members of the Committee on Environment and Natural Resources Finance and Policy

AdvaMed
Advanced Medical Technology Association

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March 3, 2024

Environment and Natural Resources Finance and Policy
Minnesota State Capitol G3
75 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Re: AdvaMed Support of HF 1627

Dear Chair Heintzeman and Members of the Committee:

AdvaMed, the MedTech Association, is writing in support of HF 1627.

AdvaMed is the largest association representing medical technology innovators and manufacturers. Our members are the device, diagnostics, and digital technology manufacturers transforming health care through earlier disease detection, less invasive procedures, and more effective treatments. Our over 600 members range from emerging companies to large multinationals, and include traditional device, diagnostic, medical imaging, and digital health technology companies.

We support the delay of the reporting requirements under Amara's Law until January 1, 2028, that HF 1627 proposes and believe this will give MPCA as well as stakeholders adequate time to develop a program that supports the goals of the original law. Understanding the complexity and importance of Amara's Law, and Minnesota's role as the first state developing a broad PFAS data reporting system, our goal has been and continues to be to work with the MPCA to ensure that the framework for PFAS data reporting is clear, scientifically possible, and protects patient access to medical devices regulated by the Food and Drug Administration (FDA).

Reporting and Compliance Challenges for Medical Devices

In a supply chain that is eight to ten layers deep, often, a component material supplier views their component design as their intellectual property (IP), including the specific material used. In those instances, the FDA has a regulatory approach for those suppliers to divulge information to the FDA but not to the manufacturer. As a result, medical device manufacturers will never be able to achieve 100% disclosure to MPCA. While this information is provided to FDA and the materials in the products are highly regulated, the information provided to manufacturers is not always consistent or standardized regarding the materials in the product.

It may take device manufacturers upwards of several years to even identify where in the supply chain regulated PFAS substances occur before they can attempt to mitigate and change their processes. There is no "commercially available" technique that can assess all 10,000+ PFAS chemicals at one time.

In fact, European Chemical Agencies PFAS restriction proposal, Annex XV Report of the Registry of Restriction Intention states that chemical standards for only 40 PFAS exist for quantitative analysis. Additionally, analytical techniques can only assess what can be extracted out of a device, it becomes near impossible to identify what is present rather than what can leach out. Furthermore, the very nature of fluorine means it is naturally monoisotopic and, therefore, extremely difficult to identify de novo in extracts as part of an unknown. Commercially available software algorithms have an inherent bias to deduce a chemical formula containing fluorine through the use of high-resolution mass spectrometry. This inherent bias leads to a high number of false positives.

While there are upwards of 10,000 PFAS currently known, this is an evolving and growing number. Less than 1% of these PFAS have a commercially available analytical reference standard (CAARS) and since a CAARS is needed to perform a quantitative analysis of a given material to determine the amount of all PFAS potentially in the sample, this simply is not practically achievable, unless and until, an analytical reference standard is available commercially for each of the 10,000+ PFAS. Even then, the burden of trying to test a given sample for 10,000+ different PFAS to potentially certify that no PFAS are present, will be a massive burden on obligated parties as well as the test labs performing the work, given that potentially thousands of manufacturers will simultaneously need this testing.

Many medical technology manufacturers are global companies already complying with EU REACH requirements and reporting mandates for several years. AdvaMed recommends that MPCA review how the EU Waste Frame Directive and the associated SCIP database is structured and consider harmonizing its reporting mandates to ensure continuity, accuracy, and utility of the reported data.

Conclusion

In closing, AdvaMed believes that delaying the reporting deadline to January 1, 2028, will allow MPCA to develop a more robust reporting framework. Our recommendations for that framework from our response to MPCA's RFC in November 2023 are below.

AdvaMed urges MCPA to consider expeditiously issuing a request for comments on "current unavoidable use" of PFAS, under subdivision 5. While FDA regulated medical technology is exempt from subdivision 5, our suppliers are not. The industry is extremely concerned about the resiliency of our supply chain if additional suppliers exit the market without substitutes that meet the unique properties necessary to maintain FDA standards for medical devices and packaging. The Department of Defense recently reported to Congress that "PFAS are critical to DoD mission success and readiness and to many national sectors of critical infrastructure, including information technology, critical manufacturing, health care, renewable energy, and transportation." Advancing the rulemaking process for subdivision 5(c) and issuing a list of products not subject to the ban well in advance of 2032, would provide clarity to manufacturers about the potential supply chain risks and prevent disruptions to critical infrastructure, including health care.

Second, we urge MPCA to pursue some form of information collection request (ICR) to better inform the regulator of the current state on PFAS by industry type before finalizing a rule. This could be done confidentiality without the need for disclosing proprietary information and would allow for a more considered approach to addressing this issue. This has been done in the past and did give the regulator a better footing for a risk reduction-based approach.

Finally, AdvaMed has been on record expressing our concern to the legislature and to MPCA that medical devices continue to be subject to the reporting requirements, even though they are exempt from the ban. In keeping with Maine and Connecticut's decisions to categorically exempt medical devices from both the ban and reporting requirements in their PFAS ban laws, we strongly urge Minnesota to follow suit. Both states concluded that if the state deems a product to be safe and essential enough to be exempt from the ban, it follows that the state should exempt those products from reporting. Minnesota should focus gathering PFAS data on consumer products whose supply chain origins are unknown and are not rigorously regulated by any federal authority.

AdvaMed appreciates the opportunity to support this important legislation. We look forward to working with the legislature and MPCA to be a technical resource on this complex and precedent setting law.

Sincerely,

Adrienne Frederick
Director, State Government & Regional Affairs
AdvaMed

Chairman Josh Heintzeman
House Environment and Natural Resources Finance and Policy Committee
75 Rev Dr Martin Luther King Jr Boulevard
St Paul, MN 55155

Dear Chairman Heintzeman and Members of the Committee:

The American Chemistry Council (ACC)[1] appreciates the opportunity to provide written testimony on HF 1627, which would extend the reporting timelines under Amara's Law (Minn. Stat. § 116.943).

ACC has been an active participant in the implementation of this law, including engagement in the various MPCA stakeholder meetings. We remain committed to working with the Legislature and MPCA to implement meaningful policies that address priority issues related to PFAS.

A key focus of MPCA's implementation efforts and feedback from various stakeholders has been on the challenges associated with the reporting requirements of Minn. Stat. § 116.943 and the lack of systems, processes and guidance which are still under development by MPCA. Key factors that support the need for HF 1627 include:

1. **The broad definitions, scope and reporting outlined in Minn. Stat. § 116.943 will impact thousands of businesses and thousands of products making implementation incredibly challenging for MPCA and Minnesota businesses.**

   Fluorochemistry includes a broad universe of chemistries with different physical, chemical, and toxicological properties as well as uses. We have reiterated throughout the legislative and regulatory processes that it is not neither scientifically accurate or appropriate to group all fluorinated chemicals together as one. Despite this, the Minnesota law coverers thousands of products including numerous products in almost every industry and part of the economy. This includes critical products in key sectors:

- Agriculture
- Electronics
- Medical
- Refrigeration
- Heating, Ventilation and Cooling
- Optical and Data Transmission
- Transportation Including Automotive
- Aerospace
- Semiconductors
- Paint and Coatings
- Food
- Batteries and Battery Storage
- Energy Production Including Solar and Wind Energy
- Industrial Equipment

[1] The American Chemistry Council (ACC) represents over 190 companies engaged in the business of chemistry—an innovative, $639 billion enterprise that is helping solve the biggest challenges facing our nation and the world. The business of chemistry drives innovations that enable a more sustainable future, creates 555,000 manufacturing and high-tech jobs—plus over four million related jobs—that support families and communities, and enhances safety through the products of chemistry and investment in research.

2. **MCPA needs additional time to develop, test and communicate IT systems, processes and guidelines for any reporting.** To date, MPCA is still actively working to develop the necessary systems, processes, rules and guidance to enable accurate reporting.

   As the Agency is aware, it will receive notifications for hundreds of thousands of products from all sectors of the economy. This is a massive undertaking. Consequently, it will be essential that the Agency take whatever measures are necessary to build in a beta testing phase to ensure that the system is sufficiently robust to manage the number of users and volume of filings including protection of that information as noted below. Additional time will also allow MPCA to address the continued confusion and uncertainty about the entity that is required to report a product under this law.

3. **Additional time is needed to ensure that businesses can adequately prepare and have appropriate guidance to respond to any reporting requirements.** Even if MPCA is able to complete the relevant systems required for accurate reporting and develop appropriate guidance to inform stakeholder input and compliance, additional time will be needed to communicate that to stakeholders and for businesses to develop the necessary information required for reporting.

   Because of the overly broad definition of PFAS, the scope of products covered and the breadth of information required for reporting, it will take businesses significant time to request, identify and verify the information required for reporting. There is imperfect information in the supply chain and many downstream users are not aware of the Minnesota law or process to implement the law. The State should not assume that all downstream users are aware of the regulatory process or that that they realize their products even rely on PFAS technology. This is particularly true for complex supply chains where end-users will not be aware of where PFAS technology may be used, and which rely on subcomponents manufactured by others. It will take time for manufacturers to request, obtain and verify from their suppliers the information being required for reporting.

4. **Limited lab and testing capacity is available to generate the information required within the current reporting timeframes.** Monitoring of priority PFAS is an important ongoing effort and significant efforts are already underway in this area. As a result, lab and testing capacity has already been deployed for monitoring and compliance related to various environmental, health and safety laws. The ability and capacity to accurately generate the information required for these reporting requirements is extremely limited, and, in many cases, already devoted to other priority monitoring and regulatory processes.

   Alos, commercially available analytical methods must be appropriate for the PFAS that are the target of the analysis and for the physical form of the product; e.g., gas, liquid, or solid. Analytical methods differ in which PFAS they are capable of detecting. To create an even playing field, MPCA should include in proposed regulations its intention regarding baseline criteria or performance standards for “any test methodology.” It would be inappropriate in our view for the Agency to allow the use of any method that any commercial lab says it can perform on any product matrix with no consideration of whether the method is fit for purpose or has undergone any multi-laboratory validation or otherwise assessed for the purpose for which they are being used (i.e., accuracy, precision, specificity, detection limit,

and quantification limit). Doing so would be well outside the realm of good regulatory science. We also recommend that the Agency incorporate the concept of validation into its regulatory explanation of what "commercially available analytical methods" will be acceptable.

5. **It is critical that any reporting appropriately safeguard proprietary business information that protects innovation and intellectual property.** The Department should create clear procedures for safeguarding valid proprietary claims. Minnesota's program would require manufacturers to disclose sensitive proprietary information about the specific chemical identities, functions, and amounts of PFAS in their products. Manufacturers derive independent economic value from this information and take the necessary steps at to protect such information since, without such protection, manufacturers would be placed at a competitive disadvantage and their investments in innovation would be undermined. Given that the reporting covers critical products in vital economic sectors such as electronics, energy, transportation, and military applications, inadequate protection could compromise national security and infrastructure. In addition, manufacturers that are unable to assure the protection of their intellectual property in the State of Minnesota may choose to avoid the Minnesota market, which would inevitably result in Minnesota residents and businesses being deprived access to innovative products and technologies.

   The concept of a "trade secret" is well established in Minnesota law and is defined in the Minnesota Uniform Trade Secrets Act. Such information may also be recognized as confidential by federal or other state agencies. Therefore, the Agency should provide clear instructions regarding the specific steps that must be taken to officially assert and/or substantiate a trade secret claims for information submitted that qualifies as a trade secret under Minnesota law, including the timeline by which such claims must be made relative to the reporting deadlines. The Agency also should define in regulation a process whereby a manufacturer is to be notified if its trade secret is subject to a public records request or is inadvertently disclosed by the Agency or any organization with which the Agency collaborates or contracts in the administration of the reporting program, including other states and the organization that designs, operates, or otherwise administers the reporting platform.

Failure to adequately address these issues will prevent MPCA from implementing the underlying law's requirements and have adverse impacts and unintended consequences for Minnesota consumers and businesses. We urge the Committee to support HF 1627.

Sincerely,

Marcus Branstad
Senior Director, State Affairs
American Chemistry Council
marcus_branstad@americanchemistry.com

ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

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AHAM.ORG

March 3, 2025

Representative Josh Heintzeman
Chair
Environment and Natural Resources Finance and Policy Committee
2nd Floor Centennial Office Building
St. Paul, MN 55155

Representative John Burkel
Vice Chair
Environment and Natural Resources Finance and Policy Committee
2nd Floor Centennial Office Building
St. Paul, MN 55155

Chair Heintzeman and Vice-Chair Burkel, and members of the Committee, thank you for the opportunity to share the viewpoints of the home appliance manufacturing industry regarding HF 1627.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's members produce hundreds of millions of products each year. In Minnesota, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Minnesota is $3.6 billion, more than 20,000 direct and indirect jobs, $468.5 million in state tax revenue, and more than $1.2 billion in wages. They design and build products at the highest levels of quality and safety. As such, they have demonstrated their commitment to strong internal safety design, monitoring, and evaluation/failure analysis systems. AHAM supports the intent to protect consumers against all unreasonable risks, including those associated with the exposure to potentially harmful chemicals. AHAM also firmly supports the appropriate use of PFAS chemicals in appliances. Together with industry design practices, test requirements, and redundant safety mechanisms, PFAS chemicals play an important role in the safety of household appliances.

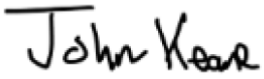
HF 1627 would push back the 2026 reporting on intentionally added PFAS to 2028. **AHAM supports this proposed extension.** January 2026 reporting deadline is quickly approaching, and the Minnesota Pollution Control Agency (MPCA) has yet to provide a draft rule for the requirements. Appliance manufacturers employ a complex, global supply chain for thousands of models with hundreds of thousands of components, often involving multi-tiered suppliers located on multiple continents with thousands and thousands of components. This includes an array of manufacturers, from small private firms to multinational corporations, providing chemicals, component parts, and assemblies that come together in a final manufactured article. Given the complexity of modern supply chains, appliance manufacturers reported that they must obtain supplier declarations regarding the content of components. There are also concerns remaining concerns on the fee structure- would every SKU count as a notification? These complexities highlight some of the outstanding issues with the reporting deadline that still needs to be worked out through additional time.

AHAM also supports HF 1627A1 Amendment which would incorporate recommendations from the Minnesota Pollution Control Agency related to products containing lead, cadmium, and PFAS. Specifically, the proposed amendment excludes electronic or internal components until

2032. Many cookware products that are incorporated into the 2025 PFAS prohibitions are complex products with electronic or internal components and should be treated differently to those products that do not have internal components. This additional time is needed to identify substitutes, and even if a substitute is found, manufacturers need time to test, design, retool, and restock global supply. This amendment would just reaffirm and put into statute, guidance that MPCA has already provided, as articulated in MPCA's Information on 2025 prohibitions for retailers and manufacturers, "For the purposes of the 2025 PFAS prohibitions, the MPCA interprets cookware to include only items that have a food contact surface that has a nonstick PFAS coating."[1]

Thank you for considering our views and please contact me at jkeane@aham.org or 202-872-5955 if you would like to discuss in more detail.

Respectfully submitted,



John Keane
Manager of Government Relations

[1] https://www.pca.state.mn.us/sites/default/files/c-pfas-rule1-00a.pdf

AGC
Your Dreams, Our Challenge

March 3, 2025

Rep. Josh Heintzeman, Chair
Rep. Peter Fischer, Minority Lead
Committee on Environment and Natural Resources Finance and Policy
State of Minnesota House of Representatives

Re: Testimony in Support of H.F. 1627

Dear Chair Heintzeman, Minority Lead Fischer and members of the House Environment and Natural Resources Finance and Policy Committee:

AGC America, Inc., ("AGC") appreciates this opportunity to provide testimony in **support of H.F. 1627**, which would amend Minnesota Statutes section 116.943, subdivision 1, pertaining to products containing perfluoroalkyl and polyfluoroalkyl substances (PFAS). AGC is an international company with U.S. operations in chemicals, electronic materials, life sciences, automotive glass, and research and development. Our chemicals company manufactures and supplies a range of specialized industrial chemicals and materials, including resins, coatings, films and membranes, that are incorporated into a broad spectrum of products essential to the daily lives of Minnesota residents and businesses.

H.F. 1627 would amend Minnesota's PFAS in products law in two important ways. First, the bill would modify the definition of "product" to exclude items intended for industrial or commercial use. Second, the bill would extend the deadline by which manufacturers must notify the Minnesota Pollution Control Agency (MPCA) of products containing intentionally added PFAS that are sold or distributed for sale in the state. For the reasons discussed below, we support both of these provisions.

Industrial and Commercial Products

AGC appreciates the legislature's continuing efforts to tackle contamination in Minnesota from the PFAS chemicals that have made their way into drinking water and groundwater. We have testified in states across the nation considering PFAS legislation and we have supported legislation focused on eliminating sources of PFAS in consumer products such as juvenile products, cookware, food packaging and other similar products.

The current law in Minnesota goes well beyond banning PFAS-containing consumer products. Starting in 2032 it will also ban industrial and commercial products that are crucial to Minnesota's economy. Any machine that requires durable seals, gaskets or fuel lines to function safely and reliably will be impacted by the 2032 ban, as will any device or equipment that requires reliable and durable microelectronics, coated wires, or high speed digital communication. All of these products rely on a small group of materials called fluoropolymers. Unlike PFAS chemicals of concern such as PFOA and PFOS, fluoropolymers are inert, non-toxic, not bioavailable and, importantly, they do not dissolve in water so they cannot migrate to groundwater and do not dissolve in wastewater or drinking water.[1] They also provide a unique combination of physical, chemical and electrical properties that enhance the safety, reliability and durability of products under a wide range of operating conditions, which is why they are used in critical products such as wiring insulation for airplanes and electric vehicles, electrical components for cell phones and computers, medical devices such as pacemakers and heart catheters, as well as gaskets, fuel lines and seals for motor vehicles and manufacturing equipment. Because of their unique combination of properties, fluoropolymers are also essential to make products used in renewable energy applications such as solar panels, wind turbines and hydrogen fuel cells, along with many other applications important to Minnesota businesses and residents.

Unless industrial and commercial products are excluded from the prohibitions of the current law, Minnesota businesses and residents will risk losing access to the safe, durable and reliable manufacturing equipment, electronic devices and other technologies that are critical to future of Minnesota and its economy.

Extension of Product Notification Deadline

Based on comments previously submitted to MPCA, it is reasonable to anticipate that when the product notification requirements of the existing law take effect, which is currently slated to occur on January 1, 2026, the Agency will receive notifications from thousands of manufacturers, including many small businesses, that will be reporting on tens or hundreds of thousands of products from all sectors of the economy.[2] Stakeholder comments also reveal

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[1] Indeed, peer-reviewed studies demonstrate that, because of these and other characteristics, fluoropolymers satisfy internationally-recognized criteria for being "Polymers of Low Concern" (PLC) – that is, polymers deemed to have insignificant environmental and human health impacts. *See "A critical review of the application of polymer of low concern regulatory criteria to fluoropolymers II: Fluoroplastics and fluoroelastomers," Korzeniowski, Stephen H., et al., Integrated Environmental Assessment and Management 19, 2 (2023): 326–354. DOI: 10.1002/ieam; "A Critical Review of the Application of Polymer of Low Concern and Regulatory Criteria to Fluoropolymers," Henry, Barbara.J., et al Integrated Environmental Assessment and Management,.,14, 3 (2018): 316-334. DOI: 10.1002/ieam.4035.*

[2] See, e.g., the following comments previously submitted to MPCA and available at https://www.pca.state.mn.us/sites/default/files/c-pfas-rule1-02.pdf: Comments of Alliance for Automotive Innovation (November 28, 2023) (highlighting the tens of thousands of individual parts and assemblies contained in each automobile); Comments of Coalition of Manufacturers of Complex Products (November 28, 2023) (noting that the products manufactured by coalition members are assembled from "hundreds of thousands of components and parts"); Comments of the National Marine Manufacturers Association (NMMA), the Marine Retailers

widespread confusion and concern about various aspects of the product notification requirements. For example, commenters have expressed confusion over who would be responsible for reporting on products or product components that reach Minnesota through complex supply and distribution chains, highlighting multiple opportunities for "double or triple counting" a single product or product component as well as, paradoxically, the real possibility that some products may escape reporting altogether due to confusion around reporting responsibilities.[3] Commenters have also raised concerns about their ability to know and/or obtain all of the information that may be demanded of them as part of the notification requirement, especially with respect to complex products with multi-tiered, global supply chains. AGC shares these concerns, and others, as expressed in our own comments to MPCA.[4]

We hope that through the rulemaking process MPCA will be able to successfully address the myriad questions and concerns that stakeholders have raised regarding the product notification requirements. However, it seems increasingly unlikely that MPCA will be able to do so prior to the current notification deadline set forth in the statute, January 1, 2026. (Indeed, with less than ten months remaining before the deadline for reporting, MPCA has not yet published a proposed rule.) MPCA should be given sufficient time to allow thoughtful consideration of the comments it receives on the proposed rule, rather than being rushed to complete a rule due to an arbitrary reporting deadline. Given the extraordinary volume of reports MPCA is likely to receive, and in light of the many questions and concerns stakeholders have voiced about the reporting requirements, it is imperative that MPCA be given additional time to ensure that the final reporting regulations are clear and workable and will provide regulators with meaningful

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Association of the Americas (MRAA), and the Water Sports Industry Association (WSIA) (November 28, 2023) (noting that boats contain "thousands of parts and accessories"); Comments of Consumer Technology Association (November 28, 2023) (noting that "[a] single electronic product can have thousands of components").

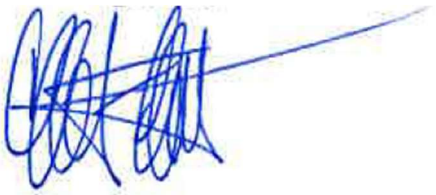
[3] See, e.g., the following comments previously submitted to MPCA and available at https://minnesotaoah.granicusideas.com/discussions/40410-minnesota-pollution-control-agency-request-for-comments-on-pfas-in-products-reporting-and-fee-rule/topics/submit-a-comment-321: Comments of the Industrial Truck Association (December 19, 2024) ("ITA members are concerned that Amara's law will jeopardize their ability to sell forklifts in Minnesota if the law is interpreted to require literal compliance with subdivision 2(a)(3) because literal compliance will not be possible. ITA urges MPCA to explore regulatory approaches that will balance the State's need for PFAS data with a realistic understanding of the limited, non-specific PFAS information currently available to manufacturers of complex products."); Comments of the Consumer Technology Association (December 19, 2024) (" Our comments below on the MPCA questions underscore the need for precise guidance on numerous technical points that we request b[e] clarified in a final rule – and only after exact reporting requirements are issued can manufacturers effectively begin to collect many of the data elements needed. For example, electronics manufacturers cannot say with certainty exactly how long it will take to gather this information without knowing threshold limits and reporting ranges – issues which we address later in these comments. Given the complexity of the issue and the extensive reporting the law requires, we respectfully ask that the Agency grant an extension to the electronics sector for 48 months after the final adoption of their rulemaking.")

[4] *Id.*

information without creating unnecessary burdens. For this reason, we support extending the product notification deadline to January 1, 2028, as set forth in H.F. 1627.

We appreciate the opportunity to submit this testimony and would be happy to provide any additional information that would be helpful to the Committee as it considers H.F. 1627. Should you have any questions or concerns about the information provided herein, please reach out to Ahmed El Kassmi at 610-423-4312 or by email at ahmed.elkassmi@agc.com.

Sincerely,



Christopher F. Correnti
President and CEO
AGC America, Inc.

AIR-CONDITIONING, HEATING, & REFRIGERATION INSTITUTE
we make life better®

2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

March 3, 2025

Representative Josh Heintzeman
2nd Floor Centennial Office Building
St. Paul, MN 55155

RE: HF 1627 -- SUPPORT

Dear Members of the Environment and Natural Resources Finance and Policy Committee:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits this letter of support for HF 1627, which would delay the reporting deadline of products that contain perfluoroalkyl and polyfluoroalkyl substances (PFAS) to 2028.

AHRI represents more than 330 manufacturers of heating, ventilation, air conditioning, refrigeration (HVACR) and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than $211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 704,000 people.

AHRI supports extending the reporting deadline to 2028. Even for industries with a strong understanding of the chemical makeup of components, ensuring an accurate dataset of chemicals within their supply chains is extremely difficult. This extension will provide the HVACR and water heating industry with additional time to survey their supply chains and improve their ability to comply with the regulation.

AHRI appreciates the opportunity to submit this letter.

Sincerely,

Hayley Davis
Manager, State Government Affairs

SUSTAINABLE PFAS ACTION NETWORK

March 3, 2025

Chairman Josh Heintzeman
Capitol G3
75 MLK Jr. Blvd
St. Paul, Minnesota 55155

Re: Support for HF1627, with Additional Recommendations

Dear Chairman Heintzeman:

The Sustainable PFAS Action Network (SPAN) is writing to express support, with additional recommendations, for HF1627. The bill's provisions would delay the PFAS in Products reporting requirement from January 1, 2026 to January 1, 2028. It would also narrow the definition of "Product" to apply to products intended for personal and residential uses, and exclude commercial and industrial uses.

Background on SPAN

SPAN is a coalition of PFAS users and producers committed to sustainable, risk-based PFAS management. Our members advocate for responsible policies grounded in science that provide assurance of long-term human health and environmental protection while recognizing the critical need for certain PFAS materials for U.S. economic growth and global competitiveness. A recent study by INFORUM, a Washington-based economic consulting firm, found that critical PFAS-using industries (e.g., automotive, aerospace, air conditioning and refrigeration, medical device and pharmaceutical, battery, and semiconductors) contribute more than $1 trillion to the U.S. gross domestic product each year, accounting for more than six million U.S. jobs, while providing annual wages estimated to exceed $600 billion. SPAN was formed with the objectives of ensuring legislators and regulatory agencies are aware of the critical need of products generated by our members while simultaneously supporting practical regulatory programs focused on protecting human health and the environment and maintaining America's global economic edge.

Comments Regarding Current Provisions of HF1627

SPAN strongly supports the bill's provision to delay the start of Minnesota's PFAS in products reporting requirement by two years, from January 1, 2026 to January 1, 2028. Minnesota currently has the most expansive PFAS in products law in the country, after Maine passed a reform bill in April 2024 which significantly modified the scope of that state's requirements. Minnesota currently is the only state in the country that requires reporting on all PFAS-containing products, along with a total ban on all such products in 2032. While the currently enacted reporting program will require a much greater number of changes to more reasonably reduce its scope, some of which are detailed below, SPAN strongly encourages the legislature to start by adopting this modest delay in the effective date.

The bill also would amend the definition of "Product" in the bill, by eliminating the reference to commercial- and industrial-use products, to focus only on those products intended for personal and residential uses. While this is a significant improvement, SPAN would recommend additional clarifications to the definition of "Product," such as to clarify the intent of the amendment to focus on items intended for use only by consumers. The phrase "including for use in making other products" should be deleted from the definition; products requiring professional installation and maintenance should also be excluded. While the amended definition will still remain very broad even with these few changes, SPAN strongly supports this as the first of many steps that should be taken to implement risk-based reforms to Minnesota's PFAS in Products program.

Additional Amendments to HF1627

SPAN has been active in several state-level PFAS policy discussions for more than three years, and has enjoyed a productive and cordial dialogue with policymakers across the country. In the last year, over ten states have considered legislation that would have required reporting or a total ban on all PFAS products, using an overly-broad definition, and then have chosen to adopt more measured and practical approaches. Maine, the first state to adopt a class-based PFAS program, passed legislation that nearly eliminated their broad PFAS reporting program and greatly narrowed their 2032 product ban. New Hampshire recently adopted EPA's more focused PFAS definition in consumer product legislation so that they could properly focus commercially-active compounds. For these reasons, SPAN proposes below changes to the Minnesota PFAS in Products program that can be adopted into HF1627. SPAN looks forward to working with the legislature to implement this more practical and effective approach.

Align with Federal EPA Reporting Rules

Even with the amendments outlined in the bill, Minnesota's reporting program will remain overly broad, administratively burdensome, and virtually impossible to implement. In 2023, EPA released final rules for the Agency's PFAS reporting program pursuant to the Toxic Substances Control Act Section 8(a)(7). This reporting program requires manufacturers and importers in the U.S. to report their PFAS usage from 2011 to 2023, with data being gathered this year. SPAN strongly recommends that Minnesota reform their reporting program to better align with the EPA rules, along with the effective date delay.

Risk-Based Exemptions

Last year, Maine reformed their first-in-the-nation PFAS in products law to reshape the requirements and include several important categorical exemptions to their reporting program and ban. Currently, New Mexico is considering similar exemptions for a class-wide PFAS in products program. SPAN strongly recommends that Minnesota adopt a similar list of exemptions for the reporting requirement, which should include (but not be limited to):

- Fluoropolymer uses
- Materials approved for use through the significant new alternatives program (SNAP) under the Clean Air Act;
- Medical devices and drugs and their direct-contact packaging
- Products necessary for meeting, federal specifications (such as for Department of Defense requirements and military specifications);
- Transportation equipment, including automotive, aerospace and maritime uses;
- Air conditioning, heating, ventilation, and refrigeration equipment;
- Appliances and equipment used in harnessing energy, and all equipment critical for the

transition to a Clean Energy economy;

- Batteries and other components in electric vehicles;
- Semiconductors, transistors, wiring, insulation, connections, housings and other electronics; and
- Equipment and materials directly used in the manufacture or development of products listed above; while still excluding fluorosurfactant use in the production and manufacturing of fluoropolymers

Conclusion

SPAN strongly supports HF1627, and would recommend several additional changes to the state's PFAS in Products law to narrow its scope and reduce administrative burdens, not limited to the changes described above. We look forward to working with policymakers in Minnesota on further amendments to HF1627, and additional reforms in the near future.

March 2, 2025

I am the President of Kapra Cosmetics, a minority owned business with a 30 year history of producing skin and hair products that are sold internationally and also very locally in salons as well.

I wanted to express the importance of awareness and stewardship of the environment for a business to be successful, sustainable and a good partner to the community as a whole.

A little background of our business-

We are located in Brooklyn Park, MN and have about 80 employees from diverse backgrounds working together to produce some of the finest skin and hair care products in the market. The products we manufacture are sold across the entire retail spectrum in Amazon, Target, Walmart, Ulta, Bath & Body Works, Walgreens, CVS, Great Clips and many, many more retailers.

Recent legal cases surrounding PFAS and other industrial chemicals have brought awareness and discussion of the small changes that industry and consumers can make to put environmental sustainability ahead of commerce. Our chemical vendors are on the forefront creating ingredients with sustainability built in to ensure we are constantly aware of the larger environment which we are a part of and impact on a daily basis. Not only are consumers forcing change, but the work of forward thinking institutions and researchers are paving the way at the foundational level to inspire the change necessary for our society to be a better part of the world we live in. Amara's Law is a powerful call to action that will keep product users safe and give them options to make knowledgeable decisions as consumers.

While we are very proud of our customers and the numerous products we manufacture, we also know that during or after use our products likely wash down the drain in small residual quantities and into our water system and do impact the greater environment we live in. We are an FDA regulated business and we make sure we are exceeding the standards set forth for us. By being Leaping Bunny certified, we ensure all chemicals which we purchase are not tested on animals. We are also making sure that the chemicals we use are on the EPA's Safer Chemical Ingredients list while also adhering to regulations in the European Union, California's Prop 65 and even Whole Foods's compliance lists. We are but a small part of a larger change in the consumer products industry working with consumers and vendors to give sustainable choices to our society thus incrementally changing our planet to be better for future generations. Even packaging suppliers are moving towards more recyclable content and also exploring the use of bamboo and other "greener" options to replace the plastics that have been the ubiquitous option.

Our goal is to work together with organizations like yours to be part of the chain that grows stronger through education and awareness and challenging our vendors to meet the ever evolving discussion around environmental consciousness and sustainability.

Thank you!

Office: 612-782-3941 | Fax: 612-782-8884 | 8700 Xylon Ave N, Brooklyn Park MN 55445 | kapracosmetics.com

Anshu Atreya
President

MedicalAlley

DATE: 3/4/2025

Members of the House Environment and Natural Resources Finance and Policy Committee,

Medical Alley represents a global network of more than 800 leading health technology and care organizations including representation from all corners of the state of Minnesota. Our mission is to activate and amplify healthcare transformation.

Recognized worldwide as a leader in healthcare innovation, Minnesota sets the standard for excellence — impacting local communities and influencing global health outcomes and advancements. With access, affordability, and quality as top priorities, Medical Alley and our partners are committed to developing solutions that drive meaningful changes and save lives.

It is with these guiding principles that Medical Alley supports HF1627, extending the PFAS reporting requirements from 2026 to 2028.

As a non-profit organization representing Minnesota's leading healthcare companies and manufacturers, we are committed to advancing healthcare innovation while also protecting the environment. Our partners embrace the responsibility of minimizing environmental impacts to ensure a healthy and sustainable future for all Minnesotans. However, compliance with PFAS reporting requirements presents unique challenges for the healthcare industry — particularly due to the complexity of medical device manufacturing and global supply chains.

Medical device manufacturers often rely on third-party suppliers for critical components, making it exceedingly difficult to track and disclose PFAS content across an entire product's design. While manufacturers can ensure compliance for products they fully control, many medical devices require intricate supply chains spanning multiple countries and numerous tiers of suppliers.

For example, a Magnetic Resonance Imaging (MRI) device consists of nearly 120,000 individual components, many of which contain sub-components sourced from suppliers up to seven to ten layers deep. Identifying the chemical composition of each part would require tracking over 12,000 chemistries per component — an enormous and resource-intensive undertaking.

Furthermore, manufacturers frequently lack visibility into the proprietary designs and material compositions of third-party components, as regulatory filings and intellectual property protections often prevent full disclosure. Without access to this information, compliance with PFAS reporting requirements is exceptionally challenging.

We believe an extension of the reporting requirements will enable our state's world-class health technology and care organizations the necessary time to thoroughly assess, adapt, and implement effective strategies for compliance.

It is important to note that PFAS categories of concern tied to environmental contamination, bioaccumulation, and persistence in the environment are not reflective of all PFAS. PFAS is a very broad classification of multiple chemicals that all have varied properties. Many of the PFAS present in medical devices and medical technology are not water soluble and not a risk to the environment.

We appreciate the Committee's leadership on this important issue and urge support for HF1627. Thank you for your time and consideration.

Sincerely,

Michael Morton
Interim Senior Director of Government Affairs & Policy
Medical Alley

SEMI Global Advocacy Office
1200 G Street, NW Suite 325
Washington, DC 20005

www.semi.org

March 3, 2025

Dear Members of the House Committee on Environment and Natural Resources Finance and Policy:

I write to you on behalf of SEMI, the leading global industry association working to advance the business of the electronics manufacturing supply chain, in support of H.F. 1627. If enacted, this legislation would allow the Minnesota Pollution Control Agency (MPCA) additional time to develop and seek public input on a more targeted regulatory proposal for the per- and polyfluoroalkyl substances (PFAS) reporting requirement authorized under Amara's Law.

SEMI represents more than 560 member companies in the United States reflecting the full range of the country's semiconductor industry, including design automation and semiconductor intellectual property (IP) suppliers, device manufacturers, equipment makers, materials producers, and subcomponent suppliers. SEMI member companies are the foundation of the $2 trillion global electronics industry, and this vital supply chain supports 350,000 high-skill and high-wage jobs across the United States.

Semiconductors are the foundation of all electronics and information technology that are essential to our modern world and the health and safety of Minnesota residents – everything from critical infrastructure (including renewable energy) to aerospace and defense systems, medical equipment, automotive electronics and so much more. PFAS are essential to the semiconductor industry because of unique properties that fulfill the purity and precision criteria required for semiconductor manufacturing. This is especially true of the equipment, materials, and components that exist across all stages of the semiconductor manufacturing process. For most PFAS, there are no alternatives that are scientifically, economically, or logistically feasible, now or in the foreseeable future.

Minnesota is home to one of the strongest semiconductor value chains in the United States, including a well-developed and robust design and fabrication network.[1] Minnesota-based companies annually export over $1.2 billion in semiconductor-related components and import nearly $575 million in semiconductor-related components.[2] According to the Minnesota Department of Employment and Economic Development (DEED), the state's semiconductor and other electronic manufacturing sector includes 153 firms supporting 9,588 jobs with an average annual wage of $68,692.[3] DEED Commissioner Matt Varilek spoke to the significant footprint that the industry has in the state when he noted that, "Minnesota's semiconductor sector is strong and growing, making our state an important hub for domestic manufacturing of this important resource."[4]

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[1] Minnesota CHIPS Coalition, *Commentary: Minnesota Can Be a Leader in the U.S. Chip Renaissance* (Mar. 28, 2023), https://finance-commerce.com/2023/03/commentary-minnesota-can-be-a-leader-in-the-u-s-chip-renaissance/#:~:text=Minnesota%27s%20companies%20annually%20export%20over,Engineering%20Research%20Associates%20in%20St.

[2] *Ibid*.

[3] Minnesota DEED, Industry Snapshots: Computer and Electronic Product Manufacturing (June 2019), https://mn.gov/deed/newscenter/publications/review/june-2019/industry-snapshots.jsp.

[4] https://mn.gov/governor/newsroom/press-releases/?id=658760

With all this in mind, SEMI strongly supports the two-year delay of the reporting requirement that would be enabled under H.F. 1627 and its focus on residential uses of PFAS. Current Minnesota statute has the PFAS reporting requirement starting on January 1, 2026. This is an inadequate amount of time for an industry as complex as semiconductor manufacturing because the MPCA has yet to issue a draft rule for public comment. As a consequence, the regulated community does not have a regulatory proposal to guide the information gathering activities that will be necessary for complying with the reporting requirement once it is in place.

The depth and complexity of the semiconductor manufacturing supply chain serves as a useful way to highlight the challenges facing the regulated community in complying with the reporting requirement under the present timeline. Collecting PFAS data from suppliers in the semiconductor supply chain—many of whom are often two, three, or more levels upstream—can be a time-consuming and complicated effort. This is especially true considering the vast number of chemical substances in the PFAS group, the time required to ascertain how each of these substances is used and for what function, the location and availability of the data, and the fact that suppliers often claim that information about their use of a given chemical is proprietary.

The presence of potentially dozens of PFAS in any given complex product also highlights this challenge. There could be all manner of fluoropolymers (PTFE, PVDF, PFA, etc.) and fluoroelastomers (FKM, FFKM, Silicon with PFAS side chains), as well as various additives (flame retardants, surfactants, flow agents) and process residues that were intentionally added at some point in the manufacture of both PFAS and non-PFAS polymers. There could also be a variety of non-polymer PFAS used for other reasons such as dielectric mixtures in capacitors or constituents of paints, inks, and other coatings. These PFAS can be and are used solely or in combination across hundreds, if not thousands, of components of complex products. As one example, it has been reported that a single multi-chamber system for processing semiconductor wafers can have 107 unique O-rings directly specified by the system manufacturer in 315 individual use applications (which does not include indirectly specified O-rings that might be present in commercial components used in the system such as fluid valves).[5]

In closing, SEMI respectfully requests that the Committee approve H.F. 1627. The statutory changes that this legislation would enact are necessary for the MPCA to pursue its public health and environmental sustainability goals while preserving the ability of critical industries, including semiconductor manufacturing, to continue operating in the state.

SEMI thanks you for your consideration and hopes that you will consider our association to be a resource as you continue to craft policy relevant to the semiconductor industry.

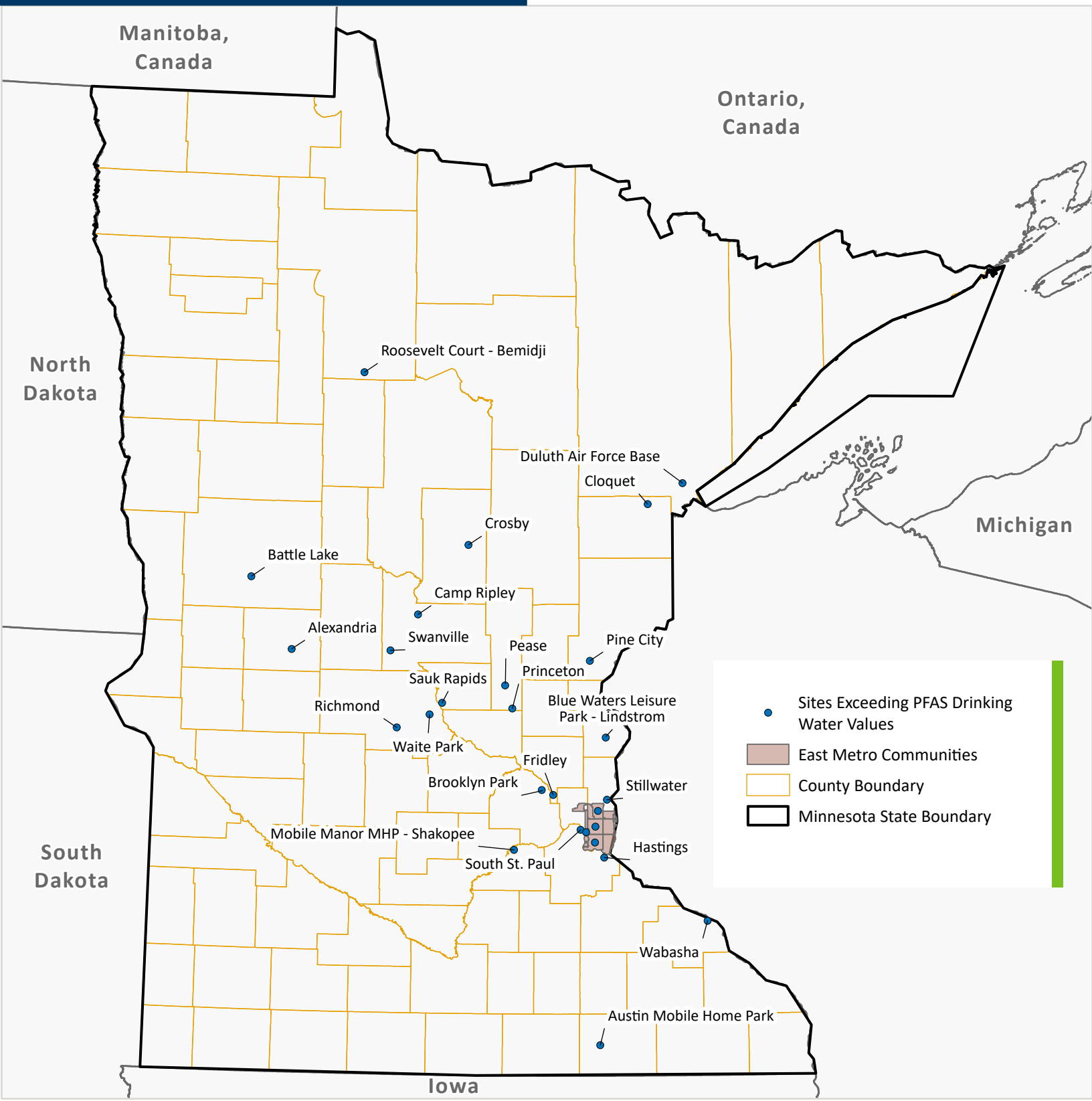
Sincerely,

Ben Kallen
Senior Manager, Public Policy & Advocacy

[5] PFAS-Containing Articles Used in Semiconductor Manufacturing, Table 3, Page 47
https://www.semiconductors.org/pfascontaining-articles-used-in-semiconductor-manufacturing/

Sites Impacted by PFAS

MINNESOTA POLLUTION CONTROL AGENCY



East Metro Communities:

- Afton
- Cottage Grove
- Denmark Township
- Grey Cloud Island Township
- Lakeland
- Lakeland Shores
- Lake Elmo
- Maplewood
- Newport
- Oakdale
- Prairie Island Indian Community
- St. Paul Park
- West Lakeland Township
- Woodbury

N

0 25 50 Miles

Date Published: 3/3/2025

CONSERVATION MINNESOTA

March 4, 2025

RE: HF1627 (Heintzeman)

Chair Heintzeman, and members of the House Environment and Natural Resources Committee:

Conservation Minnesota writes to you today to express our opposition to HF 1627 (Heintzeman) and our concerns with rolling back Minnesota's nation-leading ban on PFAS chemicals in consumer products.

In 2023, Minnesota passed Amara's Law, banning non-essential use of PFAS across 11 product categories beginning this year. These bans are aimed at limiting exposure to and consumption of these chemicals through our food, water, toys, electronics, and everyday appliances.

Also called forever chemicals, PFAS chemicals do not break down naturally, and once they enter our water, soil, air and bodies, they do not go away. The negative health impacts of consuming PFAS are widely known, including an increased risk of cancer, decreased infant birth weights, and far more. Protecting our children, our water and our soil from these chemicals is one of the greatest public health issues of our time.

Minnesota has a unique relationship with PFAS, as these chemicals were manufactured here, and we have long struggled with this history. Communities across the state have felt the impact of these harmful chemicals entering their water systems, and companies like 3M have been found liable for long-term damage to human and environmental health.

The physical and environmental health impacts of PFAS chemicals are real and known, and Minnesota must not back down in this moment. HF1627 (Heintzeman) unfortunately aims to do just that, creating exemptions and extensions for commercial and industrial products to continue using forever chemicals and exposing more Minnesotans to their harmful effects.

We strongly encourage you to not support HF1627 (Heintzeman) or any bills that roll back these rules, and to protect the progress we have made in keeping PFAS chemicals out of our water, our soil, and our bodies.

Sincerely,
Nels Paulsen
Policy Director
nels@conservationminnesota.org

James Lehner
Policy Associate
james@conservationminnesota.org

Minnesota State House –
Environmental and Natural Resources Committee Meeting
Tuesday, March 4, 2025, 1:00 p.m.

Mary V. Reimann
6100 Hadley Ave. S
Cottage Grove, MN 55016

Dear Chairman Josh Heintzman and members of the House Environmental and Natural Resources Committee.

As a long-time resident of Cottage Grove, I am submitting my testimony to urge you to reject the amendments proposed today, that would weaken Minnesota's current PFAS legislation. This legislation helps to safeguard the water supply for all Minnesotans. Probably the most important function of government is safeguarding the health and safety of its citizens. I can think of no more important safeguard than that of assuring a safe water supply for all citizens.

The amendments proposed today, **HF81, HF1627, HF 1382, and HF1362**, would significantly weaken Amara's Law, **Minnesota Statue #116.943**, passed in 2023 to substantially reduce the amount of PFAS entering our water supply. Minnesota Statute #116.943 is essential to protecting the water supply of Minnesotans, by restricting PFAS use in products, when suitable alternatives are available. These proposed amendments would significantly weaken this legislation by unnecessarily exempting additional products, making our water supply less safe by increasing the amount of PFAS entering it.

My family and I have lived in rural Cottage Grove for nearly 25 years, and our water is supplied by a well, a formerly pristine well that has now been contaminated by high levels of PFAS. We now have a very large, very costly filtration system, to reduce the risk of PFAS harms to our family. It was shocking to learn that our well had been contaminated at such levels, as it supplies all of the water we use for drinking, cooking, bathing, everything. While the remediation is helpful, it does not solve the bigger problem, as it does not go to the source of the problem: unnecessary commercial and industrial use of PFAS contaminating our water supply, when suitable alternatives are available. The bigger issue here is that remediating our contaminated municipal water supplies is much more expensive and less effective than taking common sense measures to prevent additional contamination in the first place.

Most of us are familiar with the adage, "An ounce of prevention is worth a pound of cure." Unnecessary use of PFAS in products, when there are suitable, safer alternatives widely available, is not only foolish and short sighted, it is also dangerous, threatening the health and safety of our citizens, by contaminating our most precious and essential natural resource: our water. Taking every possible measure through smart and effective legislation to reduce PFAS entering our water supply in the first place is the responsible and ethical way to proceed.

I urge you to stand firm and reject these proposed amendments. Amara's law must be upheld intact.