

March 23, 2026

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 4257 (PFAS Chemicals)

Dear Chair Heintzeman,

The Association of Equipment Manufacturers appreciates the opportunity to provide the following comments on House File 4257 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 70,000 jobs throughout the state of Minnesota and contributes roughly \$13.4 billion to the state economy every year.

The Association of Equipment Manufacturers (AEM) **strongly supports** HF 4257. AEM recognizes interest in managing PFAS contamination to protect the health of the state's citizens and the environment. HF 4257 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 products with currently unavoidable uses**. HF 4257 would additionally provide manufacturers with an important extension to the reporting deadline.

We therefore respectfully urge you to **support** HF 4257.

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 typical consumer goods, heavy-duty equipment is not discarded in landfills. Instead, most equipment is **disassembled as part of a remanufacturing process**, with engines in particular being **fully deconstructed into their component parts**. During remanufacturing, highly valuable engine cores are rebuilt and reused, while materials such as hoses, seals, plastics, and related components are **shredded, melted, and recycled to the greatest extent possible**, reinforcing the industry's commitment to responsible end-of-life management and circular economy principles.

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 4257 would enable greater compliance with the law by providing companies with a one year extension of the deadline** for reporting of products containing intentionally added PFAS. Extending the reporting deadline is particularly important for manufacturers because supply chains for complex equipment are multi-tiered and global, and PFAS-related information is often not readily available at the part and material level. Additional time allows companies to gather accurate data from suppliers, validate submissions, and build internal compliance systems so that reports. A one 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 4257** 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