



**MOTORCYCLE
INDUSTRY
COUNCIL**



March 22, 2026

The Honorable Peter Fischer
Co-Chair, House Environment and Natural
Resources Finance and Policy Committee
5th Floor Centennial Office Building
St. Paul, MN 55155

The Honorable Josh Heintzeman
Co-Chair, House Environment and Natural
Resources Finance and Policy Committee
2nd Floor Centennial Office Building
St. Paul, MN 55155

Re: SUPPORT FOR HF 4257

Dear Co-Chair Fischer and Co-Chair Heintzeman:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ **strongly support HF 4257**, which would extend the reporting deadline from July 1, 2026 to July 1, 2027, provide that reporting is only required for products being manufactured on or after that date, and exclude certain products, including motor vehicles, motorcycles, ATVs, and side-by-sides, from the 2032 ban.

Reporting Deadline Extension

MIC, SVIA, and ROHVA support extending the deadline for reporting by twelve months. With significant problems reported during the beta testing period, manufacturers need to be provided with additional time to comply with reporting requirements, which will allow Minnesota to receive more accurate submissions. Participants in the soft launch experienced system errors that impeded completion, which raised concerns about whether submissions had been accurately captured. Extending the deadline by twelve months will help to ensure the system errors are resolved and will decrease the number of troubleshooting requests the Minnesota Pollution Control Agency will inevitably receive from manufacturers who are experiencing problems with the system.

As with other complex durable goods, motor vehicles, including motorcycles, ATVs, and side-by-sides are made up of thousands of components. Motor vehicle and powersport manufacturers assemble finished products from components that are sourced from global supply chains, relying on suppliers to provide chemical data for each component. Due to reasons beyond the manufacturer's control, including trade secrets, suppliers can refuse to provide such data to manufacturers, making it nearly impossible to know the exact chemical composition of each component within a vehicle, absent extensive and expensive testing. Absent an extension, manufacturers may be forced to choose between noncompliance due to reporting limitations or ceasing sales in Minnesota.

With fewer than four months before the reporting requirement takes effect, manufacturers lack sufficient time to collect and verify supplier data and submit the data through the PRISM system, which is not yet fully operational.

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

Excluding Motor Vehicles, Motorcycles, ATVs, and Side-by-Sides from the 2032 Ban

MIC, SVIA, and ROHVA supports classifying certain products, including motor vehicles, motorcycles, ATVs, and side-by-sides, as currently unavoidable use and excluding such products from the reporting requirement and 2032 ban. The powersports industry understands your desire to address those PFAS that easily enter the environment and can bioaccumulate; however, the **currently unavoidable use polymerized PFAS used in powersports vehicles have very low risk of entering the environment or your body.**

According to a [2021 OECD report](#), “the term ‘PFASs’ does not inform whether a compound is harmful or not, but only communicates that the compounds under this term share the same trait for having a fully fluorinated methyl or methylene aliphatic carbon moiety.” In the wake of nearly impossible implementation of their overly broad PFAS law, Maine recognized these challenges and passed sweeping legislation (LD 1537/SP 610) to amend the law **excluding several categories of products - including motor vehicles, motorcycles, all-terrain vehicles, and recreational off-highway vehicles - from their PFAS in products ban.** Last year, New Mexico also excluded several products, including motorcycles, ATVs, and side-by-sides, from not only the product ban, but also the reporting requirements. The Minnesota legislature also recognized the need for an exclusion for youth OHVs from the juvenile product ban and we ask that this same exclusion apply to adult sized OHVs, motorcycles, and side-by-sides.

Fluoropolymers are essential, in motorized vehicles for fuel and electric systems, powertrains, brakes, semiconductors, cables, and wires. This type of PFAS is critical to the system’s safety by protecting against fire risk, preventing clean air violations, increasing service life, and lowering maintenance costs for consumers. This results in better fuel economy, reduced emissions, and enables use of alternative fuels and power storage batteries. Fluoropolymers do not pose a risk to human health or the environment as they are not bioavailable, not water soluble, not mobile, and do not bioaccumulate⁴.

There should be differentiation made between the types of PFAS and **fluoropolymers and fluoropolymer applications should not be restricted.**

Standards to Protect Riders

Manufacturers must ensure our vehicles and safety gear meet durability standards that are sufficient to protect riders. Any potential PFAS free alternative must also meet durability and safe operation standards that are equal to or exceed current quality to be deemed a suitable replacement. This takes considerable resources and time that is not provided in current law. Due to the volume of products requiring testing, manufacturers are not confident they can comply with the 2032 effective date, especially given that our vehicles include hundreds or even thousands of parts and nearly every industry supplier will be competing for product testing under current law.

Our member companies continue searching for suitable replacements for PFAS in their vehicle parts and products, but **currently PFAS is an unavoidable use to ensure safety, proper functioning of our vehicles, and compliance with state and federal flammability and clean air regulations.** Minnesota must allow manufacturers sufficient time to find replacements and not subject consumers to risk of harm resulting from unavailability of these products.

We appreciate the provisions of HF 4257 and strongly urge the House Environment and Natural Resources Finance and Policy Committee support the legislation. Thank you for your consideration of these comments and if you have any questions, please contact me at 571-684-6144.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations
Motorcycle Industry Council
Specialty Vehicle Institute of America
Recreational Off-Highway Vehicle Association

⁴ [Henry et al. 2018](#), [Korzeniowski et al. 2022](#)