



March 24, 2026

The Honorable Josh Heintzeman
The Honorable Peter Fischer
Co-Chairs, House Committee on Environment and Natural Resources Finance and Policy
2nd Floor, Centennial Office Building
658 Cedar Street, St. Paul, MN 55155

Re: HF 4257 - Extension of PFAS Reporting Requirements and PRISM Implementation Timeline (Support)

Dear Co-Chairs Heintzeman and Fischer:

On behalf of the RV Industry Association (RVIA), I write to express strong support for HF 4257, which would extend the PFAS reporting requirements and delay implementation of the PRISM reporting system by 12 months, to July 2027.

RVIA is the national trade association representing over 470 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all RVs produced in the United States—including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, park model RVs, and truck campers. The RV industry contributes more than \$140 billion annually to the national economy and \$3 billion to the Minnesota state economy each year. The RV industry is an American-made industry that supports 680,000 jobs paying more than \$48 billion in wages including. In Minnesota the RV industry supports 15,120 jobs and \$827 million in wages in Minnesota across manufacturers, suppliers, dealers and service, and outdoor recreation.

We believe the extension proposed in HF 4257 is reasonable given the ongoing challenges associated with the PRISM system, as well as insufficient guidance and user training. Additional time would allow for adequate beta testing of the system and the development and provision of clear, usable guidance and training materials.

RVs are complex products comprised of thousands of individual parts and components, ranging from flooring and upholstery to electronics, appliances, and mechanical systems. Unlike simpler consumer products, RV manufacturers typically do not manufacture these components themselves, but instead, source them from a broad and diverse global supply chain. These supply chains pose significant challenges when attempting to trace or verify the presence of intentionally added PFAS at the component level, particularly where upstream suppliers outside of the United States are not subject to PFAS disclosure or testing requirements. Any PFAS regulatory framework must accommodate the realities of complex durable goods manufacturing and the limitations that downstream manufacturers face in accessing detailed chemical composition data from upstream suppliers.

RVIA and its members have been active participants throughout the development and implementation of Minnesota's PFAS-in-products regulations under Amara's Law, including engagement during the soft

launch of the PRISM reporting system. During this soft launch, significant flaws were identified by beta testers that disproportionately impact manufacturers of complex products such as RVs. As a result, the full launch of the PRISM system was delayed until January 30, 2026, one month into the active reporting period.

After launching on January 30, 2026, substantial issues, including issues identified during the soft launch, continue to plague the PRISM system, severely limiting the ability of regulated entities to compile and submit data with confidence. These challenges are compounded by ongoing system changes during the compliance period, effectively “building the airplane while flying it.” The system has already undergone multiple revisions; version 1.0 is now up to version 1.11. This has raised concerns among regulated entities that previously entered data could be compromised, potentially undoing significant investments of time and resources ahead of the July 1, 2026, deadline. Regulated entities must have confidence that submitted data will remain secure and will not require re-entry due to system modifications.

The following are key identified issues that remain unresolved and should be addressed prior to full implementation of the PRISM reporting system:

Poor System Development and User Support: During the PRISM soft launch, participants were unable to adequately test the system due to lack of support and persistent system issues. Despite repeated attempts, both the Minnesota Pollution Control Agency (MPCA) and the PRISM support team were unavailable for a significant portion of the soft launch period. As a result, users were unable to complete a meaningful or comprehensive test of the system.

Lack of Adequate User Guidance: Guidance and support materials remain insufficient to translate the reporting requirements into workable steps for manufacturers, particularly for complex products. Further, the current guidance document is inconsistent with the system for component reporting. The guidance states that submitters must report at the “lowest practical component level,” noting that you can’t report a car radio, you must report the circuit board, wires, etc. that are within the car radio. We support reporting at the “total product level”.

Design Flaws: The system continues to present significant technical challenges, including missing PFAS substances, incomplete component categories, and a lack of transparency regarding template upload validation errors. These issues raise doubts about whether the system can handle the volume and complexity required for component-level reporting in the RV industry.

User Training: To date, MPCA has not provided sufficient training or education on the use of the PRISM system. A reporting effort of this scale requires comprehensive instruction, clear definitions, and advance preparation. For example, the system includes a drop-down menu with approximately 29,000 components but provides no definitions or guidance to assist users. Additionally, terminology used in the system is not consistent with industry standards, further complicating compliance.

Overall, the reporting process timeline has been rushed, and the PRISM system is not ready. This makes it nearly impossible for the RV industry to meet the current compliance requirements within the existing timeline.

For all these reasons, we strongly support HF 4257. Thank you for your attention to this important issue. Please do not hesitate to contact me if you have any questions or would like to discuss this further.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jason Rano', with a stylized flourish at the end.

Jason Rano
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Cc: Members of the House Committee on Environment and Natural Resources Finance and Policy
The Honorable Representative John Burkel, Co-Vice Chair
The Honorable Representative Kristi Pursell, Co-Vice Chair