

March 23, 2026

The Honorable Josh Heintzeman, Co-Chair
The Honorable Peter Fischer, Co-Chair
The Honorable John Burkel, Co-Vice-Chair
The Honorable Kristi Purcell, Co-Vice-Chair
Environment and Natural Resources Finance and Policy
Minnesota House
St. Paul, MN

Subject: Animal Health Institute Support for House File 4257A1

Co-Chair Heintzeman, Co-Chair Fischer, Co-Vice-Chair Burkel, Co-Vice-Chair Purcell and Members of the Committee on Environment and Natural Resources Finance and Policy,

I write on behalf of the Animal Health Institute (AHI) to express strong support for HF 4257A1 delaying the Minnesota Pollution Control Agency's (MPCA) PFAS reporting requirement from July 1, 2026 to July 1, 2027, and respectfully urge the legislation be included in the relevant omnibus legislation.

AHI is the U.S. trade association for research-based manufacturers of animal health products – the medicines that keep pets, service animals, and livestock healthy. Specifically, our members make a variety of products that promote and protect animal health including pharmaceuticals, biologics, flea and tick treatments, medical devices, and diagnostics. These products are essential tools used by veterinarians, food producers, and pet owners to protect the health and welfare of animals. All these products are subject to the Minnesota PFAS law's reporting requirements, although the reporting of intentionally added PFAS in parasiticides falls under the jurisdiction of the Minnesota Department of Agriculture (MDA). Information about animal drug, device, and biologic products containing intentionally added PFAS must be reported to MPCA.

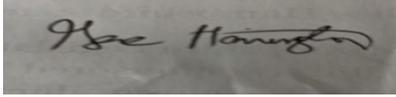
Although MDA's reporting requirement went into effect January 1, 2026, AHI has not heard any complaints from our members concerning difficulties providing such information to the Department. Conversely, AHI members that have tested out MPCA's PFAS Information System for Manufacturers (PRISM) say it is cumbersome at best and completely unworkable in other cases. In talking to our members, it is clear additional time is needed to improve or upgrade PRISM so that the required data can be properly input into the system and companies can meet their compliance obligations. Accordingly, AHI strongly supports HF 4257A1.

In closing, it should also be noted that, as written, Minnesota's PFAS law will likely phaseout, in 2032, many vaccines used to treat agricultural, service, and zoo animals for longstanding and emerging diseases as well as those used for required companion animal immunizations. Animal vaccines are not included in the current exemption for health care/medical products because they are regulated by the U.S. Department of Agriculture not the U.S. Food and Drug Administration. Minus these vaccines, countless pet owners in Minnesota will fall out of compliance with their local government's rabies vaccination requirement for companion animals, and their pets (specifically cats, dogs, and ferrets) will be subject to impoundment.

While biologics (including vaccines) do not contain active PFAS ingredients, their packaging can include PFAS chemistries in stoppers for injectables, bottles, and syringe barrels and caps. PFAS helps prevent adulteration of biologics and medical devices. A PFAS coating provides an effective barrier against organic and inorganic extractables and minimizes interaction between the biologic and the primary packaging component.

I appreciate your time and consideration of AHI's concerns. If you have any questions regarding my comments, please feel free to contact me at gharrington@ahi.org or (202) 549-5934.

Sincerely,

A rectangular area containing a handwritten signature in black ink on a light-colored background. The signature appears to read "Gene Harrington".

Gene Harrington
Senior Director, State Affairs
Animal Health Institute