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March 23, 2026

The Honorable Representative Josh Heintzeman
The Honorable Representative Peter Fischer
Co-Chairs, House Environment and Natural Resources Finance and Policy Committee
Minnesota State Capitol
St. Paul, MN 55155

RE: Support for HF 4257 – Relating to PFAS reporting date extension.

Co-Chairs Heintzeman and Fischer,

On behalf of the Consumer Healthcare Products Association (CHPA)¹, I am writing to express strong support for HF 4257 and its efforts to improve Minnesota’s timeline and approach for managing per- and polyfluoroalkyl substances (PFAS) in consumer products. While this is a targeted change, it is an important and practical improvement to the state’s law that will strengthen the overall effectiveness of Minnesota’s PFAS regulatory framework.

Extended Timeline Ensures Consistent Reporting Outcomes

Complying with PFAS reporting requirements is a complex undertaking for manufacturers, requiring detailed supply chain analysis, coordination with multiple suppliers, chemical testing for thousands of SKUs, and the development of new internal tracking systems. Many CHPA member products involve multiple components that are sourced globally, which can make it particularly challenging to identify and verify the presence of any intentionally added PFAS across the entire supply chain.

Providing additional time for manufacturers through an updated July 1, 2027, reporting deadline would help ensure that manufacturers can conduct this work thoroughly, accurately, and in full compliance with the state’s law. Without sufficient time, manufacturers may be required to submit incomplete or inconsistent data, which would undermine the reliability of the reporting system and limit its usefulness for enforcement and consumer information. A realistic timeline will promote greater uniformity across industry reporting, particularly for smaller or mid-sized manufacturers who may have limited resources to conduct these internal reviews.

Feasible Compliance for all Manufacturers

This timing adjustment may also help to avoid any unnecessary market disruptions, as an unworkable deadline could lead to either delayed product availability or precautionary withdrawal of products from the Minnesota market due to compliance uncertainties.

¹The Consumer Healthcare Products Association is the Washington, D.C. based national trade organization representing the makers of over-the-counter (OTC) drugs, dietary supplements, and OTC medical devices.

Allowing an expanded timeline will ensure that consumers maintain access to essential products while still accomplishing the goals set forth in statute.

CHPA strongly supports HF 4257 as a practical and necessary timing adjustment to ensure the success of Minnesota's PFAS reporting framework. Thank you for your consideration and leadership on this issue, and please do not hesitate to reach out if we can provide additional information or perspective.

Respectfully submitted,



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cc: House Environment and Natural Resources Finance and Policy Committee