

January 16, 2026

The Honorable Katrina Kessler
Commissioner
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

Dear Commissioner Kessler:

The undersigned organizations, representing virtually every sector of the Minnesota economy, respectfully request a postponement of the upcoming PFAS reporting requirements and the implementation of the PRISM reporting system. We strongly support extending the deadline for reporting to at least 12 months after sufficient beta testing and when the system has been found to be sufficiently operational. Manufacturers must be provided with an additional year to allow for accurate and meaningful submissions.

We support Minnesota's goals of increased transparency and environmental protection related to PFAS. Our members have invested significant time and resources to prepare for compliance and have participated in the soft launch of the PRISM reporting system in good faith. Based on this experience, however, it is clear that proceeding with reporting under the current timeline would not produce reliable information. It would unnecessarily tax agency resources to address the ongoing errors in the system at the same time companies are trying to report. Proceeding now would place manufacturers in an untenable compliance position without having a full six months to report as originally planned.

Specifically, the soft launch process has highlighted several persistent concerns. Participants encountered system instability and errors making it difficult to complete submissions consistently and raising concerns about whether submitted information would be retained or accurately reflected:

- **Product Categories** - The division of product categories in PRISM leaves too much potential for confusion or misuse. While some product families like TVs have seemingly redundant categories (several categories for various screen sizes), others product categories like O-rings have very few categories that ignore the end-use or specific market. The resulting concern is that data can easily be used to misrepresent important information like public exposure or end-of-life management. It is recommended that MPCA reconsider the categories to reflect the broad range of products in the U.S. market (as reflected in the Harmonized Tariff Schedule codes). As seen in the HTS codes, there is frequently the need for "Other" or catch-all types of categories. MPCA should consider including these options as well. These changes are necessary for laying a good foundation for PFAS reporting so that data can be used to gain real insights in the future.
- **Brand Names and Product Model Information** - Companies do not have a brand name or product model for all products. Some products may only have a company part number. This is especially true for R&D samples that could be shipped to customers in MN. Can the Brand Name and Product Model fields be made optional?

- **Drop Down Menu(s)** - It is not initially clear to the user that the reporting template (an .xlsm file) can be downloaded (this is done by selecting the Upload button, *i.e.*, “Upload the Brand Name Product Model Data”) or how to access the drop down menu lists. Only when you unhide all worksheets in the template are you able to see the lists of all drop-down options. Updated guidance would be useful that includes instructions and a complete description of the lists of all the potential attributes for each data category.
- **Incomplete Lists** - The template’s drop down menus are incomplete. In general, the component list is missing many industrial applications or it is unclear where an application may fit. As a result, information for certain components cannot be submitted at all or cannot be entered accurately using the template. It is helpful to have “Other” as an option. Another option is to allow companies to auto fill an explanation of the component or product. Overall, the categories of components are consumer product oriented. There are many industrial uses (*e.g.*, filter bags, processing components such as trays, freeze dry bags, filtration media) that are missing. For example, for technical fibers and threads, the closest match seems to be “Arts/Crafts/ Needlework Threads - Type Of Thread - Sewing Thread” but this is not accurate since these fibers are used in sails, awnings, outdoor structures and are not for arts and craft projects. A process is needed to permit attributes to be added to the component list or to indicate in the guidance that the selection of “Other” is sufficient when other reasonable options do not exist.
- **Component Names** - The names for the components listed in the template do not align in all cases with industry terms for the same components. For example, when searched, the term “headlight” yielded no results because the system uses the term “headlamp.”
- **Reportable Substances** - The drop-down menu of reportable substances also is incomplete. Thousands of substances are not included in the system. These incomplete drop down menus create the potential for errors and missing information when submitters tried to upload.
- **Fluoropolymer Considerations** - It may not be possible to separate complex materials consisting of multiple fluoropolymers (*e.g.*, films, tubes, etc.) to yield reliable quantitative information for each individual fluoropolymer. Unlike some other categories of PFAS, fluoropolymers have less variability across the different types in terms of environmental and human health concerns, so being allowed to group them for a single device or component may make sense. A generic “fluoropolymer” attribute for the chemical list and allowing for the naming of composite fluoropolymers (*i.e.*, FEP/PTFE) in the PFAS Name column, would be useful.
- **Spreadsheet Validation** - Without validation, the spreadsheet cannot be uploaded. Because the template is downloaded and pulled offline, there is no way to know if the spreadsheet has been updated until you go to upload it. This means every time there is an update to correct a bug in the system (such as adding a missing substance) a manufacturer must redownload the template, fill it out line by line again, and then upload it into the system. There is also nothing in the system that alerts you that a new

template is available, so a manufacturer may spend time filling out the template spreadsheet only to learn upon submission that it is no longer valid.

- **Already Uploaded Information** - If your session expires and you have unvalidated information, it seems that data are not saved. Autosave of the form would be helpful.
- **Guidance Materials** - 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. The spreadsheet, however, has multiple car radio component options. We support reporting at the larger unit level. The option of a template spreadsheet should make the process easier, but unfortunately, manufacturers are required to enter thousands of data cells line by line across multiple product families.
- **Replacement Parts** - There is no guidance on how to report replacement parts for complex durable goods, many of which are manufactured at the time of product development, are irregularly distributed, and do not have consistent supply chains. It is not clear if replacement parts should be reported separately. For example, if a report is submitted for the wire harness in a vehicle, should a separate report be submitted if the same harness is sold separately as a replacement part?
- **Level of detail** - Many products are complex and contain numerous components. In many cases, manufacturers do not have, and cannot reasonably obtain, the level of detailed information from 2nd or 3rd-tier suppliers which is currently required for reporting. Absent some level of flexibility, complex product manufacturers may not be able to comply, leaving them with a decision to either be in violation or stop selling into MN.
- **Schedule** - The current schedule does not provide for a sufficient reporting period, leaving insufficient time to gather, review, and submit information responsibly.

Overall we are concerned that the soft launch period was rushed, is insufficient, and exposes regulated entities to a heightened enforcement risk directly as a result of the problems with the reporting system. The PRISM reporting system is not ready to support the intake of our reports. MPCA did not meet the projected launch date of December 15, which ran over the holiday period, and guidance stated that no email support would be available for five days during this time. PRISM support was also unavailable for a significant portion of the soft launch period. Further, when submitters encountered an error and couldn’t submit data, it took multiple business days to receive a response with a fix, cutting down on the number of workable business days that were provided.

Taken together, these issues demonstrate that the challenge is not simply one of system familiarity or additional effort. Manufacturers are being required to report using a platform that is still under development within a timeline that does not allow for meaningful compliance.

Proceeding under these conditions risks generating incomplete, inconsistent, or misleading

data, which would undermine the purpose of the reporting program and create downstream challenges for both MPCA and regulated entities.

For these reasons, we respectfully request that MPCA postpone the PFAS reporting period and implementation of the PRISM tool. Additional time is necessary for the reporting system, guidance, and expectations to better align with real-world product information and supply chains. We welcome the continuation of testing the system where multiple manufacturers can actively engage with the system and provide meaningful feedback to MPCA and the PRISM developers with enough time to address needed fixes prior to implementation.

We appreciate MPCA's willingness to engage with stakeholders and we remain committed to working collaboratively toward a successful PFAS reporting program. We would welcome the opportunity to continue this dialogue and to participate in further discussions as the agency evaluates next steps.

Thank you for your consideration.

Sincerely,

AdvaMed
Alliance for Automotive Innovation (Auto Innovators)
American Chemistry Council (ACC)
Association for Manufacturing Technology (AMT)
Complex Products Manufacturers Coalition (CPMC)
Fluid Sealing Association
Fuel Cell & Hydrogen Energy Association
Household & Commercial Products Association (HCPA)
Medical Alley
Medical Device Manufacturers Association (MDMA)
Minnesota Auto Dealers Association (MADA)
Minnesota Chamber of Commerce
Minnesota Retailers Association
Motor & Equipment Manufacturers Association (MEMA)
Motorcycle Industry Council (MIC)
National Association of Manufacturers (NAM)
National Council of Textile Organizations (NCTO)
National Electrical Manufacturers Association (NEMA)
National Marine Manufacturers Association (NMMA)
Outdoor Power Equipment Institute (OPEI)
Plastics Industry Association
Power Tool Institute (PTI)
Recreational Off-Highway Vehicle Association
RV Industry Association (RVIA)
Specialty Vehicle Institute of America
Sustainable PFAS Action Network (SPAN)