



February 18, 2026

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Co- Chair  
Environment and Natural Resources  
Finance and Policy Committee  
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St. Paul, MN 55155

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Co-Chair Heintzeman and Co-Chair Fischer, and members of the Committee, thank you for the opportunity to share the viewpoints of the home appliance manufacturing industry regarding MPCA presentation on “PRISM” reporting system and fees, and status update on current unavoidable uses of PFAS rulemaking

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM’s members produce hundreds of millions of products each year. Appliance manufacturers employ a complex, global supply chain for thousands of models with hundreds of thousands of components, often involving multi-tiered suppliers located on multiple continents with thousands and thousands of components. In Minnesota, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Minnesota is \$3.6 billion, more than 20,000 direct and indirect jobs, \$468.5 million in state tax revenue, and more than \$1.2 billion in wages. They design and build products at the highest levels of quality and safety. As such, they have demonstrated their commitment to strong internal safety design, monitoring, and evaluation/failure analysis systems. AHAM supports the intent to protect consumers against all unreasonable risks, including those associated with the exposure to potentially harmful chemicals. AHAM also firmly supports the appropriate use of PFAS chemicals in appliances. Together with industry design practices, test requirements, and redundant safety mechanisms, PFAS chemicals play an important role in the safety of household appliances.

As the July reporting deadline is quickly approaching and as the first state to implement all-product PFAS reporting, the Minnesota Pollution Control Agency (MPCA) has many unresolved issues from the soft launch, including further explanations for component categories and finding and addressing errors, that need to be resolved in order to ensure PRISM is workable and feasible ahead of the compliance deadline. This has a cascading effect that delays the Currently Unavoidable Use (CUU) rulemaking. As noted in MPCA’s PFAS Update related to the CUU timeline, it is expected that Spring and Summer of this year, Amara’s Law implementation team will be focused on assisting manufacturers with their reporting and processing PFAS in product reports. MPCA does not anticipate updates to the currently unavoidable use rule development during this time. The current timeline for CUU’s creates uncertainty and is putting manufacturers in a very difficult and tight position to meet the 2032 ban, especially since the ban focused on the date of sale/distribution of products in Minnesota which essentially means manufacturers may need to have products and components updated no later than early 2031. The

rapidly approaching 2032 deadline is requiring manufacturers and their suppliers to start to make significant product planning decisions, given the lead-time needed from design to production of appliances, which can take several years.

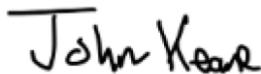
Within the broad 2032 PFAS ban, it could impact components such as semiconductors, gaskets, wirings, circuit boards, and hydrofluoroolefins (HFOs) which are climate friendly alternatives for use as refrigerator insulation foam blowing agents. For refrigerators and other complex, durable goods, HFOs offer environmental and safety benefits including ultra-low Global Warming Potential (GWP), high insulating performance and energy efficiency. HFO blowing agents are a key technology option used by some manufacturers to meet existing U.S. Department of Energy appliance energy conservation standards.

Manufacturing conversion and product redesigns could take eight or more years because of requirements to upgrade manufacturing facilities with additional safety and flammability precautions, procure and install new equipment, establish new supply chains for blowing agents, and redesign products to be compatible with new blowing agents. Given this lead-time and that several other states have recognized these unique instances and pushed prohibitions into 2040, we strongly urge the Committee to consider excluding substances that have received U.S. EPA SNAP-approval, such as HFOs, from the scope of the 2032 prohibition to align with New Mexico and Illinois and or/adopting a 2040 prohibition date for U.S. EPA SNAP-approved substances, to align with Maine.

This restriction of chemicals would require a total re-design of models at significant cost and regrettably, failing to make necessary corrections could lead to manufacturers limiting or restricting essential household products that Minnesota residents rely on. We also encourage the MPCA to implement an expedited CUU process for SNAP-approved chemicals with proven energy efficiency benefits.

Thank you for considering our views and please contact me at [jkeane@aham.org](mailto:jkeane@aham.org) or 202-872-5955 if you would like to discuss in more detail.

Respectfully submitted,

A handwritten signature in black ink that reads "John Keane". The signature is written in a cursive, slightly slanted style.

John Keane  
Manager of Government Relations