

MINNESOTA DELAYS PFAS REPORTING DEADLINE SIX MONTHS TO JULY 1, 2026

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On July 23, 2025, the Minnesota Pollution Control Agency (MPCA) announced that it will allow manufacturers an additional six months to report required PFAS information, extending the original January 1, 2026, deadline to **July 1, 2026**.

BACKGROUND

According to MPCA, it extended the initial reporting due date to **July 1, 2026** to give manufacturers more time to enter agreements with their suppliers to report on their behalf, as well as to become familiar with a new reporting platform that is expected to be made available by MPCA in the fall of 2025.

As MPCA previously acknowledged on June 23, 2025, in response to public comments on its proposed implementing regulations for the reporting requirements: "Many commenters emphasized the scale and complexity of the data collection effort required, the lack of a finalized rule and reporting platform, the challenges of global and multitiered supply chains, and the need for time to conduct supplier outreach, build internal systems, and ensure accurate reporting."

For additional information regarding Minnesota's law regulating PFAS in consumer products, refer to BCLP's insight. MPCA has also published a timeline and relevant guidance for businesses seeking to comply with the law's requirements.

REPORTING PROCESS

On or before July 1, 2026, a manufacturer of a product sold, offered for sale, or distributed in Minnesota that contains intentionally added PFAS must submit information to the MPCA that includes:

- A brief description of the product, including a universal product code (UPC), stock keeping unit (SKU), or other numeric code assigned to the product;
- The purpose for which PFAS are used in the product and/or product components;

- The amount of each PFAS substance;
- Contact information for the manufacturer; and
- Any additional information requested by MPCA.

An entity that has failed to submit this information by the July 1, 2026, deadline may not sell, offer for sale, or distribute a product in Minnesota containing intentionally added PFAS.

However, the extended timeline does not resolve another major concern from industry regarding the due diligence standard for reporting, which requires reporting parties to keep investigating PFAS in their product supply chains until all information required to be reported is known. That standard is notably different from EPA's requirement under TSCA Rule 8(a)(7) which requires companies to report information that is "known or reasonably ascertainable." In short, while the extension alleviates some concerns about timing, it does not resolve the concerns that many have voiced about the scope of the reporting obligations.

INTERNAL AND ELECTRONIC COMPONENTS EXEMPTION

MPCA has further announced one new exemption to Minnesota's law for intentionally added PFAS present in internal or electronic components. [Internal components are defined](#) as "internal parts of a product, whether permanently affixed or removable, that are designed and intended to not be touched by a person during intended use or handling. Internal components include parts of a product used for holding batteries regardless of whether the parts are touched when replacing batteries."

Notably, any "intentionally added" PFAS in these components will still be prohibited by Minnesota's general prohibition on PFAS in consumer products beginning in 2032 unless MPCA determines that there is a [currently unavoidable use](#) of PFAS.

CONCLUSION

Minnesota's PFAS law is robust in the breadth of its prohibitions and will require significant supply chain due diligence by companies that are subject to the reporting requirements, even with the recent six-month extension. There are only two other states – [Maine](#) and [New Mexico](#) – that have similar laws requiring reporting of intentional addition of PFAS to products sold in those states, but the timeline for compliance with those laws is still not as aggressive as Minnesota's.

For more information on PFAS chemicals and the regulatory compliance risks that they pose, please visit our [PFAS webpage](#). If you have a question about how to manage PFAS risk in Minnesota or in any jurisdiction, contact Tom Lee, Erin Brooks, Merrit Jones, Nora Faris, John Kindschuh, or any other member of our PFAS team at BCLP.

RELATED CAPABILITIES

- PFAS
- Environment

MEET THE TEAM



Thomas S. Lee

San Francisco

tom.lee@bclplaw.com

[+1 415 675 3447](tel:+14156753447)



Erin L. Brooks

Chicago / St. Louis

erin.brooks@bclplaw.com

[+1 312 602 5093](tel:+13126025093)



Nora J. Faris

Denver / St. Louis

nora.faris@bclplaw.com

[+1 314 259 2209](tel:+13142592209)



John R. Kindschuh

St. Louis

john.kindschuh@bclplaw.com

[+1 314 259 2313](tel:+13142592313)

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