



Connecticut's PFAS in Consumer Products Law

This document provides helpful information regarding certain provisions of the PFAS in Consumer Products Law (Connecticut General Statutes § 22a-903c). Enacted in 2024, the PFAS in Consumer Products Law addresses the use and sale of per- and polyfluoroalkyl substances (PFAS) in certain consumer products, identified as 12 categories. This document is intended to help manufacturers, distributors, retailers, municipalities, and the public understand the requirements of the PFAS in Consumer Products Law and how the Department of Energy and Environmental Protection (DEEP) applies them.

Exemption Based on Manufacturing Date

Subsection (j) of the law lists several exemptions, one of which is an exemption based on the manufactured date. Specifically, the exemption states that the law “shall not be construed to apply to: . . . (6) any product manufactured prior to any prohibition imposed by the provisions of this section” (CGS § 22a-903c(j)(6)). DEEP does not apply this exemption to the notification and labeling provisions of the statute because those are requirements, not prohibitions. The law provided nearly two years for manufacturers to sell their products prior to the notification and labeling requirements taking effect; however, if products remain on retailer shelves, those products can still be sold so long as they are appropriately labeled. This practice also ensures consistency in informing the public about PFAS in consumer products. Therefore, manufacturers of covered products must notify DEEP and label the relevant products by July 1, 2026, regardless of date of manufacture. Manufacturers may direct retailers to apply a label for products that are already in their inventory.

Labeling Exemption for Product Labels Regulated under Federal Law

Consistent with subsection (c)(1), products that are subject to federal labeling requirements—such as those governing products regulated by the EPA under FIFRA—are not subject to the state-level labeling provisions of this statute.

Clarifications to Labeling Requirements

(3) All labels shall be clearly visible prior to sale and shall inform the purchaser, using words or symbols approved by the department, that PFAS is present in the product.

If information about the product is contained in a catalog, webpage, or other methods of marketing, the label information must be included where a prospective purchaser is

educated prior to purchase. This means that the disclosure must be on the same webpage as the product, without requiring the consumer to click to another webpage.

If the product is not compliant with the provisions of CGS § 22a-903c, it cannot be sold into the State of Connecticut. Retailers and manufacturers are responsible for restricting the sale of non-compliant products into Connecticut, including online sales.

(4) Labels affixed to any such product shall be constructed of materials that are sufficiently durable to remain legible for the useful life of the product.

Labels may be affixed to the packaging of a product or the product itself, so long as the label is clearly visible prior to sale.

Retailer Obligations

The law states that “no person shall manufacture, sell, offer for sale or distribute for sale in this state” any covered products unless the manufacturer complies with the notification and labeling provisions of the law. Therefore, retailers are required to stop offering any product that DEEP determines to be noncompliant for sale in Connecticut.

Extension Requests for Compliance

DEEP is not issuing extensions for compliance with the provisions of this law. If your product is out of compliance, please **submit the notification and begin labeling products immediately**. DEEP is working to ensure that products sold into the state of Connecticut are compliant with the provisions of this law.