



July 29, 2026

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

Commissioner Kessler:

I write on behalf of the Minnesota Chamber of Commerce (Chamber), a statewide organization representing more than 6,300 businesses and more than 500,000 employees throughout Minnesota, recommending you exercise your authority under Minn. Stat. 116.943 Subd. 3. (d) (extension authority) to delay the initial deadline for reporting PFAS in products to at least February 1, 2027.

Thank you for your partnership with the Chamber in creating a rule and framework for reporting PFAS in products. In particular, your use of extension authority to move the initial deadline to July 1, 2026 and then again to September 15, 2026 has been welcome as manufacturers continue to work through compliance.

While the Chamber appreciates improvements made, the reporting system still creates an infeasible administrative burden on the regulated and regulating communities alike. For example, one audio electronics manufacturer showcases about 30 consumer products on its website, including items like headphones, sound bars, and portable speakers. This manufacturer alone published more than 2,000 lines on PFAS Reporting Information System for Manufacturers (PRISM). A mere 28 different manufacturers have reported 14,449 line items on PRISM as of today's date.

What's notably missing from the list of 28 manufacturers is a large complex product manufacturer. A company producing industrial heating, ventilating, and air-conditioning (HVAC) equipment; construction machinery; consumer or commercial trucks; boats; industrial emission control equipment; or other large, complex items remains noticeably absent from the PRISM roster. The current 14,450 line items will almost certainly increase exponentially once manufacturers of complex products enter their required information.

Chamber members are working diligently to upload their information to postmark an extension request by August 16 or upload information to PRISM by September 15 for their initial report which covers from July 1, 2023 to December 31, 2025, adjusting for the statutory change clarifying the reporting window. Meanwhile, manufacturers are also working to pull together their calendar year 2026 data, which is due February 1, 2027. Manufacturers struggle with bulk data to submit the thousands upon thousands of entry lines required to comply with the reporting requirements.

To reduce both the burden on Minnesota Pollution Control Agency (MPCA) and the regulated community, we therefore request you exercise your extension authority and move the initial report deadline to February 1, 2027, which will coincide with the calendar year 2026 deadline. Manufacturers will then not have to submit two large reports within just a few months of one another, and instead will have one, clear deadline that conveniently covers the first two reports.

Thank you for your partnership in implementing Minn. Stat. 116.943. The Chamber will continue to work closely with MPCA staff to ensure feasible implementation of PFAS reporting.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Morley", with a stylized flourish at the end.

Andrew Morley
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