



MINNESOTA PFAS PRODUCT REPORTING

URGENT FIRE-PROTECTION INDUSTRY DEADLINES & SCOPE

AUG. 16, 2026	SEPT. 15, 2026	DEC. 14, 2026	FEB. 1 EACH YEAR
Extension/waiver request postmark	Initial report due	Extended report due	Updates when required

THE MOST IMPORTANT POINT FOR FIRE-INDUSTRY MANUFACTURERS AND DISTRIBUTORS

Reporting is not limited to clean-agent chemicals such as FK-5-1-12, HFC-227ea, HFC-125, & HFC-236fa. A manufacturer must evaluate each product and each identifiable component for intentionally added PFAS, including internal and electronic components.

FIRE-PROTECTION PRODUCTS THAT SHOULD BE SCREENED (Not Limited to the below)

Suppression hardware

PTFE/Teflon tubing; fluoropolymer hose liners; O-rings, gaskets and valve seals; thread-seal materials; coated wiring; lubricants and specialty coatings.

Power & backup

Lithium-ion or other battery backup assemblies, battery separators/electrolyte-related components, power supplies and associated circuit boards — obtain supplier confirmation rather than assume.

Detection & control

Printed circuit boards; wire and cable insulation; conformal coatings; display films; switches, relays and connectors; flame-retardant polymer components.

Panels & packaging

Alarm Panels, additives, cylinders/containers, protective liners, labels or packaging integral to containing, protecting or dispensing the product.

EXTENSION: DO NOT WAIT FOR A DECISION TO START REPORTING

- **Request** must be postmarked by **August 16, 2026** and mailed with a \$300 fee per manufacturer. Approval is not automatic; an approved request moves the initial report deadline to **December 14, 2026**.
- **MPCA does not publish** a guaranteed decision turnaround time. Submit early and continue collecting/reporting data while the request is pending.
- **If denied**, the report is due within **30 days after notice of denial or by September 15, 2026**, whichever is later.

WHO MUST REPORT / WHAT IS COVERED

- **Manufacturers** of products sold, offered for sale, distributed, leased or sold online into Minnesota when the product or a component contains intentionally added PFAS.
- **“Manufacturer”** can include the producer, brand/label owner, distributor or importer/first domestic distributor when the producer or brand owner has no U.S. presence.
- **Products manufactured before July 1, 2023** are excluded. Previously used products are generally excluded; unused returns/resale inventory are not automatically excluded.
- **Internal/electronic components** remain reportable even though certain products containing PFAS only in internal/electronic components received relief from the 2025 sales prohibition.

Three Scenarios-

Scenario 1

Manufacturer → MN distributor → MN end user

Result: Both report (unless responsibility is assigned by agreement)

- The manufacturer distributed the product into Minnesota by selling to an in-state distributor.
- The distributor distributed the product within Minnesota by selling to the end user.
- Both parties meet the definition of “manufacturer” under Minnesota law (which includes producers, importers, and certain distributors/brand owners) and are therefore independently subject to reporting requirements.
- The parties may enter into a written agreement, establish appropriate reporting accounts, and designate one party to submit a report on behalf of the other.
- Such designation does not eliminate underlying legal responsibility unless explicitly provided by rule.

Scenario 2

Manufacturer → MN distributor → out-of-state end user

Result: Only manufacturer reports

- The manufacturer distributed the product into Minnesota by selling to the MN distributor.
- The distributor did not distribute the product in Minnesota, because the product was not sold, offered for sale, or used in Minnesota—it was routed out of state.
- Therefore, only the manufacturer has a reporting obligation tied to distribution into Minnesota..

Scenario 3

Manufacturer (out-of-state) → out-of-state distributor → MN end user

Result: Only distributor reports

- The manufacturer did not distribute the product into Minnesota (no sale or placement into Minnesota commerce).
- The distributor distributed the product into Minnesota by selling to the MN end user.
- The distributor is therefore required to report.
- The distributor must obtain PFAS information from the manufacturer (supplier) as necessary to complete the reporting, consistent with supply chain information-sharing expectations under Minn. Stat. § 116.943 and Minn. R. 7026

HOW TO FILE — PRACTICAL GUIDE FOR FIRE-PROTECTION COMPANIES

Minnesota PFAS Product Reporting Information System for Manufacturers (PRISM)

1 Assign responsibility and map Minnesota sales

Identify the legal manufacturer for every brand/product family entering Minnesota. Confirm in writing whether a supplier, importer, parent company or authorized representative will report on your behalf. Unless another entity confirms it has fulfilled reporting on your company's behalf, your company remains responsible. Even if another entity reports on your behalf, each manufacturer must pay the reporting fee.

2 Create the PRISM account/company profile

Prepare the account holder's name, title, phone and email; company name; NAICS or SIC code; mailing address; and physical address. PRISM permits authorized representatives and associations to request reporting relationships.

3 Build a component-level PFAS inventory

For each product/model or permitted product group, identify the lowest practical component level that explains where and why PFAS is used. Repeat the product identifiers for each PFAS-containing component.

4 Collect the required data

Obtain product description/model/code; component description; PFAS chemical or allowed "unknown" entry; chemical function; concentration range; manufacturer/contact information; and applicable trade-secret designation. Report each chemical/function combination on a separate line where required.

5 Upload, validate, certify and pay

Enter data in the browser or download the PRISM Excel template, enable macros, complete it offline and upload it. Validate errors, certify the report, and pay the one-time \$800 initial reporting fee per manufacturer.

6 Preserve due-diligence records and update

Keep supplier requests, follow-ups, responses and nonresponses. Use best available information and allowed unknown values by the deadline; continue outreach afterward. Retain records at least five years after the product leaves the supply chain and update by February 1 when required.

FIRE-INDUSTRY REPORTING EXAMPLES

Product / family	Component entry	PFAS function / reporting approach
Clean-agent suppression system	PTFE-lined discharge tubing; fluoropolymer valve seals; extinguishing agent	Report components separately; identify chemical/function and concentration range. Do not report only the agent.
Fire alarm control panel	Printed circuit board; coated wiring; display film; backup battery assembly	Request detailed supplier disclosures. Use permitted unknown values when data remains unavailable after due diligence.
Smoke/heat detector	Circuit board; polymer housing/additives; wire coating; battery	Group only products/components meeting MPCA similarity criteria for PFAS chemistry, function and concentration.
Replacement valve/seal kit	PTFE gasket/O-ring; integral packaging	May be covered as a component of the main product if identical and already reported; otherwise report separately.

OFFICIAL LINKS & CONTACTS

- [MPCA reporting hub](https://www.pca.state.mn.us/air-water-land-climate/reporting-pfas-in-products) — <https://www.pca.state.mn.us/air-water-land-climate/reporting-pfas-in-products>
- [PRISM reporting system](https://prism.theic2.org) — <https://prism.theic2.org>
- [PRISM user guides](https://www.theic2.org/prism/prism-user-guides/) — <https://www.theic2.org/prism/prism-user-guides/>
- [Minnesota Rule 7026.0060 \(extensions\)](https://www.revisor.mn.gov/rules/7026.0060/) — <https://www.revisor.mn.gov/rules/7026.0060/>
- [Extension request form](https://www.pca.state.mn.us/sites/default/files/c-pfc1-29.docx) — <https://www.pca.state.mn.us/sites/default/files/c-pfc1-29.docx>

Reporting questions: pfasreporting.mPCA@state.mn.us | **PRISM technical support:** prism@theIC2.org | **Main Contact:** 800-657-3864

Technical Issues - Andria Kurbondski - 651-757-2525 - andria.kurbondski@state.mn.us

Rule Process and Schedule - Addison Otto - 651-757-2754 - addison.otto@state.mn.us