

Practice Update

Minnesota Raises the Bar on PFAS Regulation: Understanding Amara's Law and Its Place Among State Reporting Requirements

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Amara's Law (the Law) establishes Minnesota's most comprehensive regulation of per- and polyfluoroalkyl substances (PFAS) to date.[1] Enacted in May 2023, the Law introduces a three-part framework including product prohibitions and manufacturer reporting obligations for products containing intentionally added PFAS.[2] The Law applies to products sold, offered for sale, or distributed in Minnesota, including out-of-state companies with products entering the Minnesota market.[3] The legislation honors the name of Amara Strande, who was diagnosed with a rare form of liver cancer at age 15 and spent the final months of her life advocating for PFAS regulatory reform.[4]

The Law operates in three phases. Phase 1 of the Law, effective January 1, 2025, bans the use of intentionally added PFAS in 11 categories of products, including carpets, rugs, cleaning products, cookware, cosmetics, dental floss, fabric treatments, juvenile products, menstruation products, textile furnishings, ski wax, and upholstered furniture.[5] Phase 2, with a fast-approaching deadline of September 15, 2026, requires manufacturers of products containing intentionally added PFAS and sold in Minnesota to comply with state mandated

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reporting requirements.[6] The final phase, expected to take effect by January 2032, broadly prohibits the sale of products containing the nonessential use of intentionally added PFAS.[7]

This article focuses on the novel reporting requirements under Phase 2, provides an overview of important guidelines for manufacturers, and explains the differences between Minnesota's requirements and similar laws in other states.

Manufacturer Reporting Requirements

All manufacturers selling, offering for sale, or distributing products in Minnesota containing intentionally added PFAS manufactured after July 1, 2023, must submit reporting information to the Minnesota Pollution Control Agency (MPCA) through the online PFAS Reporting Information System for Manufacturers (PRISM).[8] Each manufacturer submitting a report must pay a one-time flat fee of \$800.[9]

The reports must include:

- a description of the product or product category;
- identification of PFAS chemicals by name and CAS number;
- concentration information (reported either by specified ranges or, if unknown, through total organic fluorine methods);
- the function of the PFAS in the product; and
- manufacturer and authorized representative information.[10]

To satisfy these reporting obligations, the MPCA requires manufacturers exercise due diligence by initiating outreach and follow-up communications with their supply chain, using multiple communication methods, and clearly communicating regulatory requirements, until all required information is obtained.[11] The PRISM system allows input of “unknown” information;

however, missing information should be supplemented in the annual February 1 updates.[12]

The following are exempt from the Law's reporting requirements:

- a product for which federal law governs the presence of PFAS in the product in a manner that preempts state authority;
- a product regulated under Minnesota statutes regulating firefighting foam or food packaging;[13]
- the sale or resale of a used product; and
- information regarding PFAS-containing products or components that is provided to any federal government agency and considered classified information.[14]

Key Deadlines

The key deadline for initial reports through the PRISM is September 15, 2026.[15] As of July 2026, at least 28 companies have already filed such reports, with many more expected as the reporting deadline approaches. Manufacturers seeking a 90-day extension must submit a request, along with the required fees, by August 16, 2026.[16] Additionally, waivers may be granted where the required reporting information is already publicly available in a substantially equivalent form such as the manufacturer's website or another approved format.[17] Waiver requests are due at least 30 days before the reporting due date and approval is subject to the commissioner's approval.[18] Updates reflecting significant product changes,[19] newly available product information, or new products sold, offered for sale, or distributed in or into Minnesota during the preceding calendar year must be submitted annually by February 1.[20]

Comparison to Other State Frameworks

Minnesota's reporting requirements are broader than those adopted in many other states. For example, while Maine also requires reporting for

products containing intentionally added PFAS, the obligation is limited in part to products involving “currently unavoidable use” of PFAS and allows reporting based on information known to or reasonably ascertainable by the manufacturer.^[21] Other states, including California, focus more narrowly on targeted product bans and PFAS warning label requirements rather than comprehensive reporting frameworks.^[22] A bill that would have established a reporting program similar to Minnesota’s was vetoed in California in 2022.^[23] Minnesota’s framework therefore stands out for its expansive reporting requirements and its emphasis on manufacturer due diligence throughout the supply chain.

Implications for Future State Regulation

Minnesota’s Law is likely to serve as a model for future state PFAS regulation. Its detailed reporting scheme, emphasis on supply chain transparency, and integration of phased product prohibitions reflect an emerging trend toward broader lifecycle regulation of PFAS in consumer products. All manufacturers selling, offering for sale, or distributing products in Minnesota should begin engaging suppliers, documenting information requests and responses, and developing procedures to track PFAS-related data. These efforts can support compliance with Minnesota’s reporting requirements and position companies to respond to evolving state PFAS regulations. Manufacturers also can stay up to date with Minnesota PFAS rulemaking by signing up for email updates through the MPCA website.^[24]

^[1] *Minnesota 2023 PFAS Prevention Package: Amara’s Law*, Clean Water Action, <https://cleanwater.org/MNPFAS> (last visited Jul. 8, 2026).

^[2] *Id.* “Intentionally added means PFAS deliberately added during the manufacture of a product where

the continued presence of PFAS is desired in the final product or one of the product's components to perform a specific function." *See* Minn. Stat. § 116.943.

[3] *Reporting PFAS In Products*, Minnesota Pollution Control Agency, <https://www.pca.state.mn.us/air-water-land-climate/reporting-pfas-in-products#requests> (last visited Jul. 29, 2026).

[4] *Id.*

[5] Minn. Stat. § 116.943.

[6] *Id.*

[7] *Id.*

[8] *Infra*. n. 3. Trade-secret data will not be made publicly available. *Id.*

[9] *Id.*

[10] Minn. Stat. § 7026.0030.

[11] Minn. Stat § 7026.0080, subp. 2.

[12] Minn. Stat § 7026.0040, subp. 1(A)(2).

[13] Minnesota statute 325F.072 regulates firefighting foam; Minnesota statute 325F.075 regulates food packaging.

[14] Minn. Stat. § 7026.0090 contemplates information classified as defined in United States Code, title 18, section 798.

[15] *Reporting PFAS In Products*, Minnesota Pollution Control Agency, <https://www.pca.state.mn.us/air-water-land-climate/reporting-pfas-in-products#requests> (last visited Jul. 8, 2026).

[16] *Id.*

[17] *Reporting PFAS In Products*, Minnesota Pollution Control Agency, <https://www.pca.state.mn.us/air-water-land-climate/reporting-pfas-in-products#requests> (last visited Jul. 8, 2026).

[18] Minn. Stat. § 7026.0050

[19] “Significant change means a change in the composition of a product that results in the addition of a specific PFAS not previously reported in a product or component or a measurable change in the amount of a specific PFAS from the initial amount reported that would move the product into a different concentration range listed under part 7026.0030, subpart 1, item C.” See Minn. Stat. § 7026.0010.

[20] See Minn. Stat. § 7026.0040(A).

[21] *PFAS in Products*, Maine Department of Environmental Protection, PFAS in Products, Maine Department of Environmental Protection (last updated Apr. 8, 2026).

[22] See *California PFAS Regulations: A Compliance Checklist for Consumer Products*, Eurofins Sustainability Services, (Feb. 12, 2026), CA PFAS Compliance Checklist & Consumer Product Testing Guide.

[23] See *Proposition 65 Your Right to Know!*, CA Gov, PFOA (Perfluorooctanoic Acid) - Proposition 65 Warnings Website (last visited Jul. 8, 2026).

[24] *Infra*. n. 3.

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