



FEDERAL AND STATE PFAS OVERVIEW

What is PFAS?

Per- and Polyfluoroalkyl Substances (“PFAS”), also known as “forever chemicals”, are a class of man-made chemicals used in countless consumer products that are most known for their material properties such as resistance to water, oil, friction, and increased durability. The strong carbon-fluorine bonds of PFAS make some of them resistant to degradation and thus highly persistent in the environment. Some of these chemicals have been used for decades in a wide variety of consumer and industrial products. Products used within the RV industry that may contain PFAS, include but are not limited to: **textile articles, carpets, rugs, fabric treatment, furnishings, upholstery, flame retardants, adhesives, solar components, and semiconductors.**

Understanding the Issues and Impact

Federal

In October 2023, the EPA finalized the Toxic Substances Control Act (TSCA) Section 8(a)(7) Reporting and Record Keeping Rule, which **mandates the reporting of PFAS** by the manufacturers or importers of PFAS or PFAS-containing articles in any year since January 1, 2011.

Any entities, including small entities, that have manufactured (including imported) PFAS in any year since 2011 will have until 4/11/2025 to report PFAS data to the EPA.

Small manufacturers whose reporting obligations under this rule that are solely from article imports will have until 10/11/2025 to report PFAS to the EPA. To qualify as a “small manufacturer,” annual sales combined with a parent company must not exceed \$120 million and production cannot exceed 100,000 pounds of “chemical substance”; or if combined annual sales with a parent company are less than \$12 million, there is no weight requirement (as defined at 40 CFR 704.3).

[View the final rule](#)

State

Additionally, individual states are now proposing much broader registration and/or bans of intentionally added PFAS in products utilized by manufacturers and suppliers. In the past two years alone, (1) Maine and Minnesota passed laws banning or phasing out PFAS and/or

intentionally added PFAS and (2) California has passed two laws banning PFAS in specific product categories, including textile articles. Minnesota has passed some of the most stringent PFAS laws in the nation. As of 2025, any units that include intentionally added PFAS within 11 specific categories will no longer be able to be sold in Minnesota.

And this year, two more states – Colorado and Connecticut – have passed bans. The expectation is that this type of legislation will continue to proliferate as 16 states have already introduced legislation in 2024 that could impact manufacturers and suppliers. With many, but not all, legislatures finished for the year we expect many of these bills to be reintroduced in 2025.

A few of these states do include exemptions. For example, the California law banning PFAS in textile articles includes an exemption for motor vehicles. The Maine law also includes an exemption for motor vehicles, while the Connecticut law exempts certain products found in motor vehicles that would otherwise apply to the law. Although these exemptions include RVs (both motorized and towable), there is some ambiguity as to whether certain components may still be subject to the PFAS laws in Maine and Connecticut.

What you need to know

- RV businesses that manufacture or import PFAS or PFAS-containing articles will likely be responsible for the registration and reporting of PFAS to the EPA.
- Starting in 2025, states like Minnesota may have bans or registration requirements on your product, regardless of the federal registration and reporting requirement.
- Some states are allowing an “unavoidable use” exemption, which will allow the state to exempt PFAS uses for which there is no alternative.
- It will be important for companies to know, if they don’t already, which products contain PFAS.
- Alternatives to PFAS products are not always readily available to replace products that contain PFAS. The National Association of Manufacturers (NAM) states that it may take decades to invest and develop alternatives.

The RV Industry Association’s Government Affairs team has developed several resources to help you navigate these rapidly developing and changing scenarios.

[View the PFAS Resources](#)

Please contact Sophie de la Torre, Senior Manager of Government Affairs, at sdelatorre@rvia.org with any questions related to state or federal PFAS requirements.