

MAINE PFAS REPORTING REQUIREMENTS

What is PFAS?

Per- and Polyfluoroalkyl Substances (PFAS), often referred to as "forever chemicals," are a class of man-made chemicals known for their durability and resistance to water, oil, and friction. Due to their strong carbon-fluorine bonds, PFAS are highly resistant to degradation, making them persistent in the environment. These chemicals have been widely used in various consumer and industrial products for decades. Within the RV industry, products that may contain PFAS include, but are not limited to, textile articles, carpets, rugs, fabric treatments, furnishings, upholstery, flame retardants, adhesives, solar components, and semiconductors.

Understanding PFAS in Maine

In 2023, Maine enacted a new law aimed at preventing pollution from PFAS. This law initially followed stringent guidelines similar to those in <u>Minnesota</u>. However, by educating the legislature and collaborating with the RV Industry Association's coalition partners, a more favorable outcome was achieved for the RV industry.

The Maine law exempts motor vehicles or motor vehicle equipment regulated under a federal motor vehicle safety standard. Since RVs are motor vehicles that are regulated by certain federal motor vehicle safety standards, manufacturers of both towable and motorized RVs are generally exempt from the reporting and prohibition requirements under this law.

Impact on the RV Industry

Although the RV Industry Association is confident that most RVs and towables are exempt from these regulations, there are specific areas where exemptions may not apply. For instance, the motor vehicle exemption carves out "any textile article or refrigerant that is included in or as a component part of such products." Therefore, RV manufacturers and suppliers should be aware that certain component parts may not be exempt. Additionally, certain definitions explicitly carve out use in motor vehicles while others, like "upholstered furniture," do not.

Manufacturers and suppliers should remain vigilant in monitoring how these regulations evolve, particularly as they pertain to the RV industry. The RV Industry Association will continue to monitor Maine as regulations roll out; make sure to check <u>News and Insights</u>

regularly for the most up-to-date information. The RV Industry Association is creating a working group to continue to assess regulations and formulate responses as they roll out.

Conclusion

The new PFAS legislation in Maine represents a significant development for industries that utilize these chemicals, including the RV sector. While key exemptions have been secured, there remains uncertainty as to whether the regulations could impact manufacturers and suppliers. It is crucial for RV manufacturers and suppliers to stay informed about these legal requirements and ensure compliance where necessary. On the RV Industry Association's website under "Chemicals of Concern" there is a resource page to keep you up to date on the latest PFAS information. To watch the webinar on Federal TSCA reporting, watch it here. By understanding the scope of these laws and their potential implications, manufacturers and suppliers can better navigate the regulatory landscape and mitigate risks associated with PFAS usage.