

# PFAS FAQs

for the

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# RV INDUSTRY



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# 1. What are PFAS, and Why are They Regulated?

PFAS (per- and polyfluoroalkyl substances) are a group of man-made chemicals widely used for their water, stain, and grease-resistant properties. Known as "forever chemicals" due to their persistence in the environment, PFAS have been linked to health and environmental risks. Regulations aim to limit their use and manage their impact on public health and ecosystems.

**According to the U.S. Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA) section 8(a), a PFAS chemical is defined as a chemical substance that contains at least one of the following three structures:**

- $R-(CF_2)-CF(R')R''$ , where both the  $CF_2$  and  $CF$  moieties are saturated carbons.
- $R-CF_2OCF_2-R'$ , where  $R$  and  $R'$  can either be  $F$ ,  $O$ , or saturated carbons.
- $CF_3C(CF_3)R'R''$ , where  $R'$  and  $R''$  can either be  $F$  or saturated carbons.

In contrast, state-level actions, such as those in Minnesota, take a broader approach. **Minnesota's law defines PFAS as a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom (M.S.A. § 116.943(p)).**

This means that while the EPA designates only a select few PFAS with proven health risks as hazardous chemicals, states like Minnesota are moving to regulate all chemicals that fall under the PFAS umbrella as a precautionary measure—even if the individual risk of each compound has not been conclusively demonstrated.

**Currently, there are over 15,000 chemicals that are classified as PFAS.** The approach at the federal level is to limit a handful of known-risk PFAS. This federal approach is in stark contrast to the approach proliferating at the state level, which is to target the entire class of PFAS. Such an approach can create challenges for industries, including the RV industry. Furthermore, these challenges are exacerbated by the variety of ways PFAS can be used and the complex nature of the global supply chain involved in manufacturing complex durable goods, such as RVs. It underscores the need for clear communication among suppliers and manufacturers to navigate this evolving regulatory landscape effectively.

PFAS is a broad class of chemicals for which limited testing practices exist, often producing variable results at a high cost. Currently, the most effective method for identifying PFAS in product components is through direct engagement with suppliers. Collecting data upstream from suppliers has proven to be the best practice and can satisfy reporting requirements when done thoroughly. Manufacturers' corporate headquarters and suppliers should continue to collaborate closely to ensure accurate and complete data collection.

## 2. What are "Intentionally Added PFAS"?

Intentionally added PFAS are chemicals that are deliberately incorporated into a product's formulation to provide specific performance benefits, such as water resistance, stain resistance, UV protection or enhanced durability. These PFAS are not just present as accidental contaminants; they are purposely added to achieve a desired function. To contrast the federal and state approaches to "intentionally added PFAS", we look at Minnesota's laws because it currently has the most broadly applicable laws and regulations, and similar legislation continues to emerge in other states.

### Comparing Approaches:

- **Minnesota's Approach:**  
Under Minnesota law, the focus is on intentionally added PFAS. "Intentionally added" is defined broadly as 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. (M.S.A. § 116.943(l)).
- **Federal Approach (TSCA):**  
Under TSCA, the federal focus is less about the distinction between intentionally added versus incidental PFAS and more about regulating a select number of PFAS chemicals—such as PFOA and PFOS—that have been conclusively linked to health risks. These chemicals are unlikely to be used throughout the supply chain due to federal regulations spanning back years. The federal framework does not explicitly differentiate based on whether PFAS are intentionally added.

### Common Uses in the RV Industry:

In the RV industry, PFAS may be found in a wide variety of components to enhance performance, durability, and safety. While RV manufacturers and suppliers may not apply intentionally added PFAS directly, the broad definitions currently adopted by several states mean PFAS intentionally introduced anywhere along the supply chain would be covered under those state's laws and regulations. Possible PFAS applications include:

- **Carpets and Upholstery:** Can be used to provide stain resistance and improve the durability of interior fabrics.
- **Textiles:** Can be applied to awnings, curtains, and other fabric-based components for added water and grease resistance.
- **Adhesives and Sealants:** Can be used to enhance the longevity and performance of bonds and seals by repelling moisture and contaminants.
- **Coatings:** Can be applied to surfaces for protection against UV rays, corrosion, and environmental wear.

- **Flame Retardants:** May be present in some fire-retardant coatings and potentially in fire extinguishers.
- **Refrigerants:** Can be created by most refrigerants, including [ADD NAME OF REFRIGERANT], that are currently used in mobile air conditioning systems and may be included in the definition of “intentionally added” PFAS under several state laws, though it is **exempt** under the federal TSCA definition.
- **Plastic Parts and Resins:** May be used in mold-release agents or as processing aids in the production of plastic and resin-based parts.
- **Electronics and Touch Screens:** Can be used in insulating materials, circuit boards, and coatings that support moisture resistance and performance.
- **Gaskets, Seals, O-Rings, and Hoses:** Can be used for chemical and temperature resistance in engine and system components.
- **Lubricants, Greases, and Cutting Fluids:** May be present in these substances to reduce friction, wear, and overheating during manufacturing or maintenance.
- **Lithium-Ion Batteries:** May be used in separators or electrolytes to support battery performance and safety.

Understanding how broadly PFAS are used across RV components is key to complying with emerging regulations and communicating effectively across the supply chain.

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### 3. How Do PFAS Regulations Impact the RV Industry?

PFAS regulations affect the RV industry by targeting many of the components used in RV manufacturing—such as carpets, textiles, upholstery, and adhesives—that may contain these chemicals. These are some of the most commonly regulated product categories at the state level, where legislation and regulation tend to focus on banning the sale of consumer-facing materials and goods with intentionally-added PFAS.

In addition to intentionally-added PFAS prohibition categories, PFAS may be found in a range of critical components including electronics, touch screens, lithium-ion batteries, flame retardants, water-resistant coatings, UV-protected materials, resins, powder coatings, gaskets, seals, O-rings, and hoses.

It is essential to understand the full scope of how PFAS are used in RVs. While regulations often start with targeted product bans or reporting requirements, there is a need for clear communication across the supply chain and a comprehensive approach to compliance planning.



## Federal Regulations under TSCA Section 8(a)(7):

- The U.S. EPA requires any person that manufactures (including importers of origin) or has manufactured (including imported) PFAS or PFAS-containing articles in any year since January 1, 2011, to electronically report information regarding PFAS uses, production volumes, disposal, exposures, and hazards.
- **The federal regulations require registration to a federal database regarding the uses of PFAS. Federal reporting is NOT a restriction on the uses of PFAS.** However, there are a handful of cancer-causing PFAS chemicals that are labeled as hazardous chemicals at the federal level.

In September 2024, EPA announced a delay in the reporting period for this rule, which was originally set for November 2024. The new reporting period is scheduled to begin in July 2025 and conclude by January 2026. While there could be another delay, companies should be prepared to begin reporting in July.

## State-Level PFAS Regulations Impacting the RV Industry

### Minnesota

- Minnesota law requires manufacturers to report all products containing *intentionally added* PFAS starting January 1, 2026, with a ban on specific product categories in 2025—such as carpets, rugs, and textiles—taking effect January 1, 2025. A full ban on all products with intentionally added PFAS is scheduled for 2032 unless the use is deemed "currently unavoidable." (M.S.A. § 116.943 Subd. 5)
- **Impact on RV Industry:** Interior components like carpet, upholstery, and treated textiles may be subject to both reporting and prohibition, depending on whether such components fit the definitions of those product categories. Products with intentionally-added PFAS in these categories are prohibited for sale as of January 1, 2025. **Affixed [vehicle seating](#) is exempt. There is no broad exemption for motor vehicles or complex durable goods, meaning the law likely applies to RVs and their applicable components.** All other products containing intentionally added PFAS will be required to report by January 1, 2026.
- Furthermore, the Minnesota Pollution Control Agency (MPCA) is implementing new rules on reporting PFAS in products. The main purpose of this rule is to establish a program for MPCA to collect information about products sold in the state that contain intentionally added PFAS. The reporting is set to begin January 1, 2026. This rule also creates a fee to be paid upon submission of the information. [Proposed rulemaking](#) is currently available and will be open for a 30 day comment period. **RVIA will publish specific resources on the Minnesota rulemaking and its impacts on the [PFAS Toolkit](#).**

### California

- [California prohibits PFAS in product categories such as textiles, juvenile products, and food packaging.](#) (CA HSC § 109000)

- **Impact on RV Industry:** Motor vehicles including travel trailers are explicitly exempt, providing protection for RVs and their integrated components (e.g., interior furnishings, sealants, and systems). Aftermarket products sold separately may still be subject to restrictions if they fall within a regulated category.

## Maine

- [Maine requires reporting of all products with intentionally added PFAS and plans a full sales ban by 2030 unless a product use is designated “currently unavoidable.”](#) (M.R.S § 1614)
- **Impact on RV Industry:** The law exempts motor vehicles and motor vehicle equipment regulated under federal motor vehicle safety standards (FMVSS). RVs and OEM components fall under this exemption for both prohibitions and reporting, though aftermarket or accessory products that are not regulated by FMVSS may still require reporting, or compliance with the law.

## Vermont

- [Vermont bans the sale of various PFAS-containing consumer products—including textiles, rugs, and aftermarket stain-resistant treatments—starting July 1, 2024.](#) (V.S.A § 2494)
- **Impact on RV Industry:** The law includes a complex durable goods exemption that covers motor vehicles, including RVs. Integrated RV components such as carpet and upholstery are exempt, but standalone aftermarket items may still be restricted.

## Connecticut

- [Connecticut will ban the sale of a broad range of consumer products with intentionally added PFAS—including carpets, textiles, fabric treatments, and upholstered furniture—starting January 1, 2028.](#) (CONN. GEN. STAT. §24-59)
- **Impact on RV Industry:** The law provides a motor vehicle exemption, which includes RVs and protects their integrated components. However, similar to other states, aftermarket products sold independently of the RV may not be covered by the exemption and could be subject to the ban.

## Industry Impact:

For the RV industry, these regulations create several challenges:

- **Compliance:** Manufacturers and suppliers must ensure that all components and chemicals used in the manufacturing process meet both federal and state requirements. This may involve reformulating products, sourcing PFAS-free materials, or adapting current products to avoid non-compliance. Some uses of PFAS and disposal may be regulated at the federal level based on health risks.
- **Documentation and Reporting:** TSCA 8(a) will primarily affect suppliers and importers of record, while state regulations—such as those in Minnesota impose additional reporting

and tracking requirements that affect suppliers, manufacturers, distributors, aftermarket suppliers, and dealers significantly increasing the administrative burden.

- **Market Limitations:** With states like Minnesota prohibiting the sale of units containing certain intentionally added PFAS components, RV manufacturers risk limitations on the units they can sell within those states.
- **Data Collection Challenges:**  
Collecting accurate PFAS data presents major obstacles, particularly for suppliers attempting to gather information about upstream materials in the supply chain. Many components are sourced internationally from countries where PFAS are not regulated, meaning the data may be unavailable or incomplete. Additionally, some suppliers may be unable to disclose detailed chemical information due to proprietary concerns. These issues complicate reporting compliance and highlight the importance of early engagement with supply chain partners.

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## 4. Which Regulations Currently Impact the RV Industry?

### Federal Regulations (TSCA Section 8(a)(7)):

- The U.S. EPA requires any person that manufactures (including importers of origin) or has manufactured (including imported) PFAS or PFAS-containing articles in any year since January 1, 2011, to electronically report information regarding PFAS uses, production volumes, disposal, exposures, and hazards.

**The federal regulations require reporting to a federal database regarding the uses of PFAS over a retrospective period. Federal reporting is NOT a restriction on the uses of PFAS.** In September 2024, EPA announced a delay in the reporting period for this rule, which was originally set for November 2024. The new reporting period is scheduled to begin in July 2025 and conclude by January 2026.

### Minnesota PFAS Regulations:

#### Bans on Prohibited Categories:

- As of January 1, 2025, [Minnesota](#) has implemented a ban on certain product categories that contain intentionally added PFAS. These prohibited categories include items like carpets, rugs, textile articles, and cleaning products (M.S.A § 116.9407).



- This ban can impact the inventory that dealers are allowed to sell in Minnesota. Manufacturers must be vigilant about any components used in their products that fall under these prohibited categories.

## Reporting Requirements:

- Starting January 1, 2026, manufacturers, suppliers, and distributors selling products into Minnesota will be subject to [reporting requirements](#). Depending on the 2025 legislature and time needed by regulators for rulemaking, these dates are subject to change (M.S.A § 116.943.21).
- The rulemaking related to these reporting requirements is expected to be proposed in April 2025. This means that the specific information manufacturers will need to request from their suppliers is not yet available, so staying alert for further updates from the RV Industry Association is crucial.

## Canadian PFAS Reporting Requirements:

### Mandatory Reporting Under CEPA:

- In 2024, Environment and Climate Change Canada (ECCC) issued a notice under section 71 of the [Canadian Environmental Protection Act \(CEPA\)](#) requiring manufacturers, importers, and users of specific PFAS substances to report their 2023 activity. This applies to over 300 listed PFAS chemicals and covers substances found in coatings, textiles, sealants, and other components relevant to the RV industry.

### Scope of Reporting:

- The notice applies to entities that, in 2023, manufactured, imported, or used PFAS substances above certain thresholds. This includes PFAS present in products such as treated textiles, adhesives, insulation, and wiring used in RVs and RV components.
- Dealers often qualify as the **importer of record**, especially when bringing in RVs or components from the U.S. into Canada. If manufactured in Canada, manufacturers are responsible for reporting. However, any units brought into Canada, the importer of record is responsible for reporting.

### Reporting Thresholds:

- Manufactured more than **1,000 grams** of a listed PFAS.
- Imported or used more than **10 grams** of certain PFAS substances (as listed in Part 1).
- Imported more than **100 kilograms** of listed PFAS in products, mixtures, or manufactured items with a concentration  $\geq 1$  ppm (Parts 2 and 3).

## Updated Reporting Deadline and CRVDA Amalgamated Report:

- In 2024, the **Canadian Recreational Vehicle Dealers Association (RVDA of Canada)** successfully negotiated with ECCC for an industry-specific reporting solution.
- The **reporting deadline for the members of RVDA of Canada has been extended to July 29, 2025.**
- RVDA of Canada will submit an **amalgamated report** on behalf of participating RV dealers in Canada. This approach will streamline compliance and reduce the administrative burden for individual businesses.
- **Dealers must opt in** to be included in RVDA of Canada’s amalgamated submission. Please contact Eleanore Hamm at RVDA of Canada to opt-in. Those who do not opt-in will be responsible for filing a standalone.

## Impact on the RV Industry:

- RV dealers and distributors who import products into Canada must evaluate whether their inventory includes any listed PFAS substances.
- Opting into RVDA of Canada’s amalgamated report is a highly recommended path for compliance. Manufacturers and suppliers working with Canadian dealers should also coordinate to ensure accurate product data is shared in time for submission.

## 5. What Current PFAS Timelines Will Impact the RV Industry?

Jurisdiction	Requirement	Timeline	Impact on RV Industry
Federal (TSCA Section 8(a)(7))	PFAS Reporting (Suppliers and Importers of Record)	Starting July 2025	Requires reporting on regulated PFAS-containing products dating back to January 1, 2011. This is an exploratory initiative. Rules and deadlines may change depending on federal actions.
Minnesota	Product Prohibitions (e.g., carpets, rugs, textile articles, cleaning products)	Effective January 1, 2025	RV components that fall under these categories may not be sold in Minnesota after this date.

Minnesota	Reporting Requirements (Manufacturers, Suppliers, Distributors)	Effective January 1, 2026	Requires ongoing reporting of PFAS in products sold into Minnesota. Reports must be updated as product components change. Rulemaking expected in April 2025.
Canada (CEPA / CRVDA)	PFAS Reporting through Amalgamated Submission	Extended to July 29, 2025	RVDA of Canada will submit a single report for participating dealers, reducing administrative burden. Dealers must opt in. Non-participants must file their own standalone report.

## 6. How are Key Categories such as Carpets and Rugs and Textile Articles Defined Across the States?\*

### Carpets and/or Rugs Definitions

State	Definition	Exclusions
California	Any consumer product made from natural or synthetic fabric intended to be used as a floor covering inside commercial or residential buildings that contains PFAS; includes carpeted door mats.	Outdoor use; Vehicle interiors and parts; Resilient floor coverings; Artificial turf; Wall hangings; Table mats; Camping sleeping mats
Maine	A consumer product made from natural or synthetic fabric intended for use as a floor covering inside commercial or residential buildings; includes carpeted doormats.	Outdoor use; Vehicle interiors and parts; Resilient floor coverings; Artificial turf; Wall hangings; Table mats; Camping sleeping mats

Minnesota	A fabric marketed or intended for use as a floor covering.	None specified
Vermont	No explicit statutory definition provided.	Likely follows durable goods and vehicle exemptions.
Connecticut	A fabric marketed or intended for use as a floor covering.	Carpets/rugs for exclusive outdoor use
New Hampshire	A fabric product marketed or intended for use as a floor covering in households or businesses.	None specified

## Textile Articles Definitions

State	Definition	Exclusions
California	Any item made in whole or in part from a natural, man-made, or synthetic fiber, yarn, or fabric.	Not specified in PFAS-specific regulations.
Maine	Not explicitly defined in statute.	Vehicle seats are excluded from the textile articles definition as long as they are “affixed” to the vehicle.
Minnesota	‘Textile article’ means an item made in whole or in part from a natural, man-made, or synthetic fiber, yarn, or fabric.	N/A
Vermont	A textile product designed for indoor use such as furniture upholstery or drapery.	Vehicle applications exempt under durable goods provision.
Connecticut	Includes apparel, accessories, drapery, bedding, towels, and upholstery.	Vehicle-based textiles are likely exempt under motor vehicle exemption.
New Hampshire	Textile articles are not explicitly defined in bill text.	N/A

\*Please note that there may be other product categories defined in the state laws that may apply to components found in your products. Please review each state's laws to ensure compliance.

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## 7. How Can a Manufacturer or Supplier Determine Whether it is Subject to Federal or State PFAS Laws or Regulations?

Whether a manufacturer or supplier is subject to these laws is primarily dependent on how the law or regulation defines terms such as “manufacturer”, “product”, or “intentionally added PFAS”. It is important that each company review the definitions and any relevant applicability or exemption sections to determine whether it has to comply with the law or regulation, whether in whole or in part.

To see links and text for enacted bills, visit our PFAS Tracking Dashboard. The link to the dashboard can also be found by visiting the PFAS Toolkit. The dashboard will update in real time, so you can determine whether your company will be impacted by the latest laws.

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## 8. How Does the Federal Government Regulate PFAS?

The federal government, primarily through the Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA), regulates PFAS by focusing on a limited number of high-risk chemicals. For example, PFAS such as perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) have been identified as hazardous substances due to their adverse health and environmental impacts. While these regulations do not restrict the manufacture, processing, and distribution of these chemicals, they do provide the federal government the ability to identify and collect clean-up costs from polluters of these chemicals.

The federal government's approach is mainly focused on the chemical manufacturers—that is, the companies that produce PFAS—rather than on the downstream users who incorporate these chemicals into finished products. Under TSCA Section 8(a), detailed **reporting requirements** have been established that require chemicals manufacturers, suppliers, and importers of record to disclose information about PFAS-containing products. **This is not a federal ban but rather a reporting requirement to collect data on where PFAS can be found in the US supply chain.** This focus on the production and importation side leaves the regulation of PFAS in finished products, such as the RV industry, and their downstream usage relatively unaddressed.

As a result of this limited federal regulation—mostly through hazardous chemical designations and exploratory reporting measures—many states have taken independent action. States are now implementing their own PFAS legislation, which includes bans, labeling requirements, and additional reporting mandates. This has created a patchwork of multi-state laws that vary significantly, posing extra compliance challenges for industries like the RV industry.

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## 9. What Do I Need to Do About PFAS Reporting in Canada?

**In Canada, only importers of record are required to report PFAS to the Canadian Environmental Protection Agency (CEPA). This means that Canadian dealers, who are most likely to be the importer of record, need to ensure they meet the reporting requirements if they exceed the established thresholds for 2023. Specifically, reporting is mandatory for those who in 2023:**

- Manufactured more than 1,000 grams of any listed PFAS in Canada.
- Imported into Canada more than 10 grams of certain listed PFAS in Part 1, or more than 100 kilograms of PFAS in Parts 2 or 3.
- Used more than 10 grams of any listed PFAS in a manufacturing process.

CEPA is collecting data from 2023, similar to the U.S. Federal reporting requirements. As a result, dealers may reach out to their American manufacturing partners to prepare the necessary data. **RV Industry Association, in conjunction with CRVDA and CRVA, has successfully extended the reporting deadline from January 29, 2025, to July 29, 2025, providing additional time to compile and submit the required information.**

If American manufacturers do not yet possess the requested data, Canadian reporters can submit the missing information directly to CEPA. This reporting process also aims to identify any gaps in the supply chain where PFAS data may not be readily available.

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## 10. What Happens if a Product Contains PFAS but is Not Disclosed or Tested?

Depending on the jurisdiction, failure to comply with PFAS regulations can result in:

- Product bans or recalls
- Fines and legal action
- Loss of market access in states with strict PFAS requirements



RV Industry Association emphasizes the importance of robust compliance protocols to avoid these penalties.

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## 11. What is the RV Industry Association Doing to Help Members Comply with PFAS Regulations?

The RV Industry Association provides resources, advocacy, and guidance to help members navigate PFAS regulations. This includes monitoring legislative developments, advocating for industry-specific exemptions, and offering compliance tools such as webinars and the most up-to-date information.

[RV Industry Association Toolkit](#) includes one-pagers on a variety of state laws and a tracking board with all of the state PFAS bills RV Industry Association is monitoring in real time.

RV Industry Association has convened a PFAS working group to share information and engage members in shaping the industry's PFAS advocacy strategy and engaging legislators and regulators.

If you would like to join the PFAS working group please reach out to Sophie de la Torre, Senior Manager of State Affairs, at [sdelatorre@rvia.org](mailto:sdelatorre@rvia.org) or Bill Erny, Senior Manager of Regulatory Affairs, at [berny@rvia.org](mailto:berny@rvia.org).

RV Industry Association is actively engaging regulators at the state and federal level to educate them about the complexities of PFAS removal from vehicles and RV components. As a result, many states provide exemptions for vehicles that recognize the challenges as these chemicals are often integrated into complex systems and components that are not easily modified or replaced.

RV Industry Association is engaging in a variety of coalition activities with partnering organizations to secure exemptions and work with regulators on rulemaking. RV Industry Association continues to work with AFAI (Auto Innovators) and the National Marine Manufacturers association.

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## 12. How Can Manufacturers and Suppliers Prepare for Upcoming PFAS Regulations?

- **Audit Supply Chains:**

Identifying and documenting any PFAS content in materials or components throughout the supply chain may help prepare companies as PFAS legislation and regulation continues to spread at the state level. This includes both naturally occurring PFAS and those that are

intentionally added to products to comply with federal reporting laws and be prepared for state reporting laws. **Supply chain information gathering campaigns may be more effective when handled at the corporate level** versus the plant level, as most local plants may not have the level of information needed for proper registration.

- **Engage with Legislators, Regulators, and Industry Partners:**

Active participation in public comment periods is one of the most effective ways for the RV industry to influence regulation. Similarly, written or oral testimony during legislative committee hearings can educate legislators. Legislators and regulators rely on feedback from real businesses to fully understand the practical impact of PFAS laws and regulations. It is critical that manufacturers, suppliers, and distributors take the opportunity to share their expertise and concerns during these windows.

- Regular communication with the RV Industry Association and regulatory bodies helps businesses stay informed about evolving federal and state requirements and ensures our industry's voice is heard. **A strong example of this is the recent developments in New Mexico**, where the RV Industry Association and its coalition partners educated legislators on the complex nature of motor vehicles and successfully secured key exemptions in PFAS legislation.

- As many of these regulations are still in development, **continued feedback from industry stakeholders is vital**. The more input regulators receive, the more balanced and practical the resulting rules will be. Staying engaged isn't just about compliance—it's about protecting the long-term viability of the RV industry.

- **Monitor Regulatory Developments:**

Keep a close eye on both federal and state-level regulatory changes. With differing approaches—such as targeted federal bans versus broader state-level initiatives—you will need to adjust your compliance strategies accordingly.

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## 13. What Exemptions Exist for the RV Industry?

**In states such as Maine, Vermont, and California, exemptions have been secured to address the complexities of PFAS removal from vehicles and RV components.** These exemptions recognize that motor vehicles — including RVs — present unique challenges when it comes to eliminating PFAS, as these chemicals are often integrated into complex systems and components that are not easily modified or replaced.

California's PFAS regulations include specific language that exempts motor vehicles from certain reporting, labeling, and ban requirements. Similarly, Connecticut, Rhode Island, and New Hampshire have also excluded motor vehicles from the definitions regulating textile articles and rugs.

Provisions have been adopted in Maine and Vermont, ensuring that the stringent measures aimed at other product categories do not unduly impact the vehicle sector through complete motor vehicle exemptions.

**Additionally, RV Industry Association and its coalition partners have successfully secured an exemption for ["affixed" seats](#) in vehicles in Minnesota, further demonstrating our commitment to protecting industry interests.**

These exemptions offer vital relief while the industry transitions to PFAS-free alternatives. RV Industry Association is working closely with an industry coalition to further develop and strengthen these vehicle-specific exemptions.

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## 14. What are the Trends the Industry is Facing in 2025?

In 2025, the RV industry is facing increased state-level PFAS legislation compared to previous years. Illinois is considering laws modeled after Minnesota's approach, which involve bans on certain PFAS-containing products and strict reporting requirements. Additionally, states such as New Mexico have passed legislation to impose complete bans on intentionally added PFAS, RV Industry Association was able to secure key vehicle exemption. With similar efforts to ban PFAS emerging in New York and New Jersey. Although states like Nevada are proposing labeling requirements that are unlikely to directly impact the RV industry, these developments contribute to a fragmented regulatory environment. For the most up-to-date information on the states RV Industry Association is tracking, please visit the [PFAS Toolkit](#) and the [2025 PFAS Tracker](#).

Recently private industry has faced some personal injury lawsuits related to PFAS exposure. This has also driven state legislation to change statutes of limitations on personal injury lawsuits regarding PFAS exposure. **RV Industry Association wants to remind individual companies that documentation throughout the ongoing changes is crucial to making sure your company is protected.**

Updated: April 23, 2025