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PFAS Regulations Update

August 2025



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Overview

- State PFAS regulations have been in force since January 1, 2025 – with more coming in 2026.
- EPA compliance regulations have been delayed until April 2026.
- EPA has already cancelled many of the chemical, clean air and clean water regulations, but PFAS regulations are still in place.
- It's important to be aware of the various state rules for compliance now, **but begin to quickly remove PFAS entirely from your supply chain to avoid even more complex compliance efforts in the future**



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US EPA Reporting

Requires detailed reporting of all manufactured or imported products since January 1, 2011 – December 31, 2022.

Details	Actions
<ul style="list-style-type: none">• Reporting period: April 12, 2026 - October 13, 2026.• Small business deadline 4/13/27 (companies with annual sales less than \$120mm/25 employees)• No minimum volume or concentration exemption – any amount of PFAS known to be manufactured is reportable• <u>All US entities that manufacture or import products</u> with PFAS must report. This includes subsidiaries that import goods.• Canadian PFAS reporting deadline has passed (January 2025) for PFAS manufactured or imported in calendar year 2023.	<ul style="list-style-type: none">• Register with the EPA via EPA's Central Data Exchange (CDX) system: cdx.epa.gov• Conduct a thorough and reasonable investigation. The focus is on existing information that a company has or can reasonably obtain.



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Certificate of Compliance

Must accompany all products shipped to NY & CA retailers, signifying products are PFAS-free

Details	Actions
<ul style="list-style-type: none">• Ongoing: Suppliers must provide retailers with PFAS Certificate of Compliance proving that new product is PFAS-free, removing liability from retailers,	<ul style="list-style-type: none">• Download the certificate template from the SIA member portal and include it in your new shipments.• Attach a list of SKU's with the certificate of compliance



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In Force Now



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California AB-1817

Prohibits manufacture, distribution, selling or offering for sale textile articles with PFAS as of 1/1/25

Details	Actions
<ul style="list-style-type: none">• In effect: January 1, 2025• Textile articles “include, but are not limited to, apparel, accessories, handbags, backpacks...” Could also include helmet liners, boot liners, zipper pulls, etc.• Exemption “outdoor apparel for severe wet conditions” until January 1, 2028. Could include expedition-grade gear. The law is not clear here so each company must decide case-by-case and what their risk tolerance is.	<ul style="list-style-type: none">• Do not sell textile articles with PFAS in California after 1/1/25. This includes online sales.• Ongoing: Suppliers must provide retailers with PFAS Certificate of Compliance proving that new product is PFAS-free, removing liability from retailers,



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New York S-1322

Prohibits manufacture, distribution, selling or offering for sale apparel with PFAS as of 1/1/25.

Details	Actions
<ul style="list-style-type: none">• In effect: January 1, 2025• Apparel includes footwear, boots, etc.• Penalties: \$1000 per day for 1st violation and \$2000 per day for 2nd violation• Exemption “outdoor apparel for severe wet conditions” until January 1, 2028. Could include expedition-grade gear. The law is not clear here so each company must decide case-by-case and what their risk tolerance is.	<ul style="list-style-type: none">• Do not sell PFAS apparel in NY after deadline. This includes online sales.• Ongoing: Suppliers must provide retailers with PFAS Certificate of Compliance proving that new product is PFAS-free, removing liability from retailers.



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Colorado

Requires detailed reporting of all products that contain PFAS as of 1/1/25.

Details	Actions
<ul style="list-style-type: none">• Ban on gear designed for “extreme or extended use in severe wet conditions” (outdoor apparel for severe wet conditions) weather gear with PFAS after January 1, 2025, unless the product is accompanied by a label that states that the product contains PFAS chemicals.• "Outdoor Apparel for Severe Wet Conditions" means outdoor apparel that is: (i) an extreme and extended-use product that provides protection against extended exposure to extreme rain conditions or against extended immersion in water or wet conditions, such as snow conditions, in order to protect the health and safety of the user; (ii) designed for use by outdoor sports experts; and (iii) not marketed for general consumer use• Colorado. Ban on apparel/textiles, January 1, 2028.	<ul style="list-style-type: none">• Add a consumer-facing label disclosing PFAS on gear designed for extreme weather or severe wet conditions by January 1, 2025.



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Ski Wax

Details

- Impacted states:
 - **Vermont: July 1, 2023**
 - **Minnesota: January 1, 2025**
- Vermont: “A manufacturer, supplier, or distributor shall not manufacture, sell, offer for sale, distribute for sale, or distribute for use in this State ski wax or related tuning products to which PFAS have been intentionally added in any amount.”
- Does not address factory-applied wax. The law is not clear here so each company must decide case-by-case and what their risk tolerance is.

Actions

- Do not sell these products in these states after the respective deadlines
- Consider your risk tolerance for factory-applied wax



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Juvenile Products

Applies to products designed for use by infants or children under twelve years of age

Details	Actions
<ul style="list-style-type: none">• Impacted states:<ul style="list-style-type: none">○ Washington: 2017○ Colorado, January, 2024○ Vermont: July, 2022○ California: July, 2023○ Minnesota: January, 2025○ New York: January, 2026○ Maine: January, 2026○ Connecticut: 2027○ Rhode Island: 2027○ Wisconsin: 2028○ Oregon: reporting only• Products include cribs, car seats, etc. but <i>could</i> also include kids' ski boots, apparel, skis, etc.• The law is not clear: decide case-by-case and what your risk tolerance is.	<ul style="list-style-type: none">• Decide whether you can sell these products in these states after the respective deadlines



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2026+





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Maine

Requires detailed reporting of all products that contain PFAS.

Details	Actions
<ul style="list-style-type: none">• Ban on apparel, textiles, ski wax, juvenile products with PFAS. January 1, 2026• Outdoor apparel for severe wet conditions that contain intentionally added PFAS becomes prohibited—unless the product is accompanied by a legible, easily discernible disclosure stating "Made with PFAS chemicals." Exempt until: January 1, 2029• Ban on all products: January 1, 2032	<ul style="list-style-type: none">• Remove PFAS from products to meet the 2026 deadline or choose not to sell. Online included.• Label all apparel for severe, wet conditions



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Minnesota

Requires detailed reporting of all products that contain PFAS.

Details	Actions
<ul style="list-style-type: none">• Reporting: Manufacturers of products sold in the state containing PFAS are <u>required to report information</u> about such products including product descriptions, stock codes, purpose for using PFAS in the product or its components, the amount of PFAS, manufacturer contact information, and additional information that may be requested. Deadline: July 1, 2026.• Ban on all products: January 1, 2032	<ul style="list-style-type: none">• Report PFAS to the state, in products to meet the 2026 deadline or choose not to sell. Online included.



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Connecticut

Requires detailed reporting of all products that contain PFAS.

Details	Actions
<ul style="list-style-type: none">• Outdoor apparel: <u>Must file a report</u> to sell this product unless the manufacturer of the product provides prior notification in writing to the department. Notification includes: (i) A brief description of the product to be offered for sale, used or distributed, including the product category and the function of PFAS in the product. Deadline: July 1, 2026.• No person shall distribute, sell or offer for sale in this state any new or not-previously-used outdoor apparel for severe wet conditions that contains PFAS unless such product is accompanied by a legible and easily discernable disclosure with the statement "Made with PFAS chemicals", including for any online listing of such products for sale. Deadline: January 1, 2026• Ban on all products: January 1, 2028	<ul style="list-style-type: none">• File a report for all PFAS outdoor apparel and ski wax by July 1, 2026• Add a label to new and used “apparel for severe wet conditions” by January 1, 2026.



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Rhode Island

Requires detailed reporting of all products that contain PFAS.

Details	Actions
<ul style="list-style-type: none">• PFAS-containing ski wax and textile articles (<i>excluding</i> outdoor apparel for severe wet conditions) are banned—sales prohibited Deadline: January 1, 2027.• If the products are deemed “unavoidable use,” then you must report to the state for an exemption.• No person shall distribute, sell or offer for sale in this state any new or not-previously-used outdoor apparel for severe wet conditions that contains PFAS unless such product is accompanied by a legible and easily discernable disclosure with the statement "Made with PFAS chemicals", including for any online listing of such products for sale. Deadline: 1/1/27• Ban on all products: January 1, 2029	<ul style="list-style-type: none">• File a report for all PFAS outdoor apparel and ski wax by July 1, 2026• Add a label to new and used “apparel for severe wet conditions” by January 1, 2027.



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Washington

Apparel ban in 2027

Details	Actions
<ul style="list-style-type: none">The law will ban the manufacture, distribution, and sale of apparel and accessories containing intentionally added PFAS. In effect: January 1, 2027Apparel intended for extreme and extended use - manufacturers must report if their products contain intentionally added PFAS, for items manufactured on or after January 1, 2026, with reports due by January 31, 2027, and annually thereafter. This applies to several product categories, including performance outerwear made from leather, natural textiles, synthetic textiles, or technical textiles, footwear, gear for recreation and travel	<ul style="list-style-type: none">Remove all outdoor apparel and textiles containing PFAS from retailers and online sales in Washington State by 1/1/27Reports due on Apparel intended for extreme and extended use by 1/1/27



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Ski Wax

Details

- Impacted states:
 - Maine: 2026
 - Minnesota: 2026
 - Colorado: 2026
 - Connecticut: 2028
 - New Mexico: 2028
 - Rhode Island: 2027
- Does not address factory-applied wax. The law is not clear here so each company must decide case-by-case and what their risk tolerance is.

Actions

- Do not sell these products in these states after the respective deadlines
- Consider your risk tolerance for factory-applied wax



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Other Proposed Regulations

Massachusetts: Legislation to ban the use of PFAS in all consumer products as of **2027**

Wisconsin: Legislation to ban products containing PFAS, with limited exceptions, in **2034**



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Action Steps

- **Download the certificate of compliance and attach with your fall '25 shipments to NY & CA retailers**
- **Get ready for January '26 bans in: ME, MN, CT, RI**
- **Segment your e-commerce strategy to avoid sales in specific states**
- **Got wax? Don't sell it in ME, MN, CO after January 1**
- **Continue to gather data for the EPA reporting deadline in April '26**
- **Get ready for more: Build a culture of compliance. Understand your supply chain, develop internal processes to gather data on all your products.**
- **Mitigate PFAS now to avoid more regulations in the future**



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Action Plan For Hard Goods

Test your products. Conduct a TOF test on wax, textiles, apparel, juvenile products.

Skis & Snowboards

- Test your wax and assess risk on factory- applied wax
Consider your exposure on juvenile products for sales in CA, NY, ME, CO, VT, WI
- Begin your reporting process to the US EPA, due April-October 2026-conduct due diligence with your suppliers now.

Helmets, boots, bindings, goggle straps, labels, etc.

- Consider where PFAS may be found in textile components of boot liners, helmets, poles, goggles, etc., be aware of upcoming bans and textile reporting deadlines.
- Attach a PFAS certificate of compliance with your F/W 25 shipments. (The same rule applies to apparel in New York as well)

Segment your e-commerce strategy to avoid sales in specific states.



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Need Help?

Contact:

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