

# PFAS REGULATIONS IN 2025 AND BEYOND

*Examining the new and updated state-level PFAS regulations beginning in 2025.*

## INTRODUCTION

In recent years, Per- and Polyfluoroalkyl Substances (PFAS) have received increased scrutiny as a significant environmental and public health concern, prompting the passage and implementation of new state, federal, and international regulations. By 2024, dozens of states across the U.S. had enacted numerous laws to limit or altogether curb the extensive use of these chemicals that are nearly ubiquitous in manufacturing. These regulations vary greatly by state and in their context, in turn creating a regulatory environment rife with confusion and the potential for contradiction. While the scope and impact of these laws vary, they collectively indicate a regulatory environment focused on ridding these chemicals from consumer goods for the foreseeable future. In this Trexin Insight Paper (TIP), I will examine PFAS regulations from before 2025. I will then move to examine the new regulations being implemented at the beginning of this year, placing an emphasis on the state of Minnesota. Finally, I will include a short summary of the direction and future of these regulations, as well as their potential impacts.

## STATE-LEVEL PFAS REGULATIONS ENACTED BEFORE 2025

Prior to 2024, federal regulations surrounding PFAS, while existent, were by no means comprehensive or sweeping.<sup>1</sup> In this absence, several states passed their own laws aimed at actions like reducing the amount of PFAS found in products, the number of products that were allowed to contain PFAS, and the amount of PFAS in the environment.<sup>2,3,4</sup> Through these laws, states like Hawaii, Colorado, Virginia, and more independently took action to mitigate the presence of PFAS in materials reaching their consumers both directly and indirectly. As these state level regulations were passed and became more commonplace, the federal government also began passing new regulations through its federal agencies while bills were introduced to congress with the same goals.<sup>5,6</sup> By the end of 2024, at least 30 states had adopted PFAS regulations of some sort, thereby setting the national stage for more strict regulations to be implemented in 2025.<sup>7</sup>

## STATE-LEVEL PFAS REGULATIONS ENACTED IN 2025

Building on the momentum established in previous years, the beginning of 2025 saw the implementation of some of the strictest PFAS-regulations yet, many of which were passed in earlier years.<sup>8</sup> States across the country including New York, Colorado, and California began the rollout of additional manufacturing bans, environmental PFAS limits, and compliance certifications.<sup>9,10,11</sup> Perhaps the state with the strictest new regulations on PFAS, however, is Minnesota. In

<sup>1</sup> <https://www.epa.gov/pfas/key-epa-actions-address-pfas>

<sup>2</sup> [https://www.capitol.hawaii.gov/session/archives/measure\\_indiv\\_Archives.aspx?billtype=HB&billnumber=1644&year=2022](https://www.capitol.hawaii.gov/session/archives/measure_indiv_Archives.aspx?billtype=HB&billnumber=1644&year=2022)

<sup>3</sup> [https://www.cga.ct.gov/asp/cgabillstatus/cgabillstatus.asp?selBillType=Bill&bill\\_num=SB00100&which\\_year=2023](https://www.cga.ct.gov/asp/cgabillstatus/cgabillstatus.asp?selBillType=Bill&bill_num=SB00100&which_year=2023)

<sup>4</sup> <https://legacylis.virginia.gov/cgi-bin/legp604.exe?ses=241&typ=bil&val=HB1085+>

<sup>5</sup> <https://www.trexin.com/exploring-federal-pfas-regulations/>

<sup>6</sup> <https://www.congress.gov/bill/118th-congress/house-bill/4769/text>

<sup>7</sup> <https://www.saferstates.org/priorities/pfas/>

<sup>8</sup> <https://www.revisor.mn.gov/bills/bill.php?f=HF2310&y=2023&ssn=0&b=house>

<sup>9</sup> <https://leg.colorado.gov/bills/sb24-081#:~:text=On%20and%20after%20January%201,disclosure%20that%20states%20that%20the>

<sup>10</sup> <https://dec.ny.gov/environmental-protection/help-for-businesses/pfas-in-apparel-law>

<sup>11</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB1817](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1817)

2023, Minnesota passed Minnesota Statute 116.943, nicknamed “Amara’s Law” which bans the use of PFAS in 11 categories including cookware, cosmetics, and cleaning products on January 1<sup>st</sup> of 2025.<sup>12</sup> While this may not initially seem like much, it underscores the ubiquity of PFAS in everyday products, and highlights the fact that, although these regulations hadn’t been implemented prior to 2025, corporations have already begun phasing out the chemicals to avoid penalty. By 2032, this same Minnesota Statute will require that any intentionally added PFAS be removed from products unless totally “unavoidable”.

## FUTURE REGULATIONS AND THEIR IMPACT

Minnesota’s Statute 116.943 extends seven years into 2032 thereby underscoring the notion that PFAS regulations are ramping up rather than slowing down. Indeed, many of the above-mentioned laws began their implementation on January 1<sup>st</sup>, 2025, but will add further layers and regulations far into the future. In addition to the total exclusion of intentionally added PFAS products by 2032, Minnesota is also requiring manufacturers to begin submitting information about products containing PFAS as early as 2026. In addition to these state-level regulations, manufacturers can also expect to see the rollout of federal regulation such as the National Primary Drinking Water Regulation which, for the first time, places a federal limit on the amount of PFAS in drinking water.<sup>13</sup> As regulations regarding the usage and quantity of PFAS chemicals continue to increase, it becomes more important than ever for companies to have an understanding of the contents of their supply chains and, if necessary, ensure the compliance of their products.

## CONCLUSION

2025 is a year that, despite only just beginning, has already seen massive movement in the way PFAS are treated and regulated. More than ever before, PFAS are being critically examined by the public and legislators alike, which begets the implementation of further regulation as we collectively come to understand these chemicals and their potential impacts. As this scrutiny continues to mount and regulations become more stringent against PFAS, companies must take precautionary measures to protect and ensure the compliance of their supply chains.

Click [here](#) to learn more about how Trexin can help you survey, remediate, and prepare your supply chain for impending regulations.



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<sup>12</sup> <https://www.revisor.mn.gov/statutes/cite/116.943#stat.116.943>

<sup>13</sup> <https://www.trexin.com/first-ever-national-limits-on-pfas-in-drinking-water/>