Complex Products
Manufacturers Coalition

April 8, 2025

Chair Foung Hawj
Ranking Minority Member Steve Green
Senate Environment, Climate, and Legacy Committee
1150 Minnesota Senate Building
St. Paul, MN 55155

Dear Chair Hawj, Ranking Minority Member Green, and Members of the Committee:

On behalf of the Complex Product Manufacturers Coalition (CPMC), we would like to voice our concern that the DE to SF 2077 does not address the recommendations provided to the Committee on February 04th from the 2025 MPCA Report on PFAS and Lead/Cadmium laws implementation, nor any adjustments to PFAS laws to address challenges faced by complex products manufacturers. **We kindly request consideration to exempt internal components that do not come in direct contact with a person's skin or mouth during reasonable use.**

The Complex Product Manufacturers Coalition (CPMC) is a multi-stakeholder group dedicated to driving positive change in policymaking for sensible PFAS management. CMPC actively engages with policymakers to promote sustainable, science-based solutions. CMPC advocates for policies that protect human health and the environment while supporting the jobs and products that are essential to our society's well-being.

CPMC members assemble up to thousands of parts, components, and raw materials to manufacture products that are frequently referred to as "complex products" or "complex durable goods." These include industrial, commercial, and consumer products such as appliances, batteries, communication devices, electrical and power transmission and distribution equipment, electronics, HVACR-WH systems, lighting, outdoor power equipment, vehicles, and vessels, as well as their components and replacement parts. Complex products are used to support nearly every major sector in the nation, providing critical and often life-saving services upon which our modern society depends.

In most cases, complex products incorporate PFAS in internal components that are essential to the product's ability to function properly and are often part of an internal part. Being encased in the product interior means that any components that may include PFAS in their design are not accessible to consumers and therefore have little to no risk of exposure. Furthermore, products are bound by stringent safety and environmental protocols. Lastly, complex goods have well-established recycling frameworks, thus reducing the risk of exposure at end-of-life.

In the last 70 years, the PFAS family has grown to over 12,000 unique chemicals that have become an integral component of many critical products on which society relies. Because PFAS have been so successful in the services they provide, over the decades there has been little development of feasible alternatives. For most complex products, there are few if any known substitutes.

Finding and implementing chemical alternatives presents challenges to the regulated community, a problem that is magnified for complex products which typically have up to thousands of components. Complex products must meet strict, uniform design standards due to performance, safety, and other

considerations. Even simple chemical substitutions can take years and cost millions of dollars. The chemical substitution process requires identifying chemicals throughout shifting global supply chains (PFAS levels at less than 0.1% by weight of the final product, are usually untraceable in the supply chain), finding an alternative (if one is available), and initiating the lengthy and resource-intensive process of product redesign, which must ultimately ensure these products still meet existing regulations, safety requirements, and consumer expectations.

Due to the complexities of multi-tiered international supply chains, lengthy product development lead times, difficulties in finding suitable alternatives, and other complexities, manufacturers of complex durable goods are burdened by chemical bans beyond most of the regulated community. It is important that policymakers acknowledge this unique segment of industry and the challenges they face.

For the reasons outlined above, CMPC encourages members to include provisions to exempt internal components that will not come into contact with humans during reasonable use via amendment in mark up on Thursday. Should you have any question or would like to discuss the positive impact of these provisions further, please contact Stacy Tatman at statman@wiley.law or 202-875-4352.

Best regards,

Stacy Tatman

Stacy Tatman
Executive Director
Complex Product Manufacturers Coalition