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April 18, 2025

The Honorable John Marty
Chair, Senate Finance Committee
Minnesota State Senate
95 University Avenue W.
Minnesota Senate Bldg., Room 3235
St. Paul, MN 55155

RE: SUPPORT FOR PFAS PROVISIONS WITHIN S.F. 2216; SUGGESTED AMENDMENTS

Dear Chair Marty and Members of Senate Finance Committee:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submits this letter in support of **Article 7 of S.F. 2216**, and to respectfully offer additional recommendations to amend the statute concerning products containing perfluoroalkyl and polyfluoroalkyl substances (PFAS), for the reasons noted below.

AHRI represents more than 330 manufacturers of heating, ventilation, air conditioning, refrigeration (HVACR) and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 700,000 people.

AHRI supports the proposed amendments to Sec. 2. Minnesota Statutes 2024, section 116.943, subdivision 5 that would exempt internal components that do not come into direct contact with a consumer's skin or mouth. HVACR and water heating equipment are installed, maintained and serviced by qualified professionals, and the chemicals used in these systems and their components are not typically accessible to the general public.

AHRI suggests amending Section 116.943, subdivision 8.

AHRI respectfully requests that the committee amend **Section 116.943, subdivision 8**, to exempt HVACR and water heating equipment, including refrigerants and components used for the repair and maintenance of such systems, from the 2032 products PFAS ban. This exemption is essential to ensure the continued use of existing equipment and to prevent the premature retirement of otherwise functional systems. Notably, earlier this year, New Mexico adopted a similar approach by exempting HVACR and water heating equipment, as well as refrigerants approved under the U.S. Environmental Protection Agency's (EPA) Significant New Alternatives Policy (SNAP) program, from its PFAS product management regulations.

AHRI suggests an extension of the PFAS reporting deadline.

In addition, AHRI recommends extending the PFAS reporting deadline to from 2026 to 2028, as proposed in H.F. 1627 (Heintzeman, 2025). Even for industries with a strong understanding of the chemical composition of their products, collecting an accurate dataset of chemicals across complex global supply chains is a significant challenge. This extension would provide the HVACR and water heating industry with the time needed to conduct thorough supply chain assessments and improve compliance with the reporting requirements. We respectfully urge the committee to adopt this provision and extend the reporting deadlines until 2028.

Thank you for your attention to this important matter by considering AHRI's suggested revisions to S.F. 2216 and for your leadership in sponsoring legislation that protects both consumers and modern infrastructure. Should you have any questions, please feel free to contact me at hdavis@ahrinet.org or at 703-293-4864.

Sincerely,

A handwritten signature in cursive script that reads "Hayley Davis". The ink is dark and the signature is fluid.

Hayley Davis
Manager, State Government Affairs

cc: Members of the Senate Finance Committee
Senator Matt Klein