

Supplemental reporting guide for the PFAS Reporting and Information System for Manufacturers (PRISM)

This information is a resource for manufacturers and their representatives when using the PFAS Reporting and Information System for Manufacturers (PRISM). To access PRISM, including the primary reporting guide, follow the links from <http://www.pca.state.mn.us/pfas-reporting>.

This supplement is applicable to the first version of PRISM, launched on Jan. 30, 2026.

Is there a template I can download to work on outside of the PRISM system?

A spreadsheet template is provided in PRISM that allows manufacturers to prepare and organize their data outside of the PRISM system for later upload. See “Create a Report” in the PRISM Reporting Guide for instructions on how to download and upload the reporting template.

What product code type should I use?

Manufacturers should select the code type for the overall product/group of products being reported in the Product Model description. This code should be repeated throughout the report for each component reported for that product. Product ID does not need to be reported at the component level.

1	Brand Name	Product Model	Product Code Type	Other Code Type Name	Product Code	Component	PFA
2	Big Cook	Espresso Max	HTS		9902.16.63	tubing	CASRI
3	Big Cook	Espresso Max	HTS		9902.16.63	warming plate	CASRI
4	Big Cook	Espresso Max	HTS		9902.16.63	o-ring	CASRI
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How do I determine at what level a component is for reporting?

Please consider two definitions provided in the rule:

- "Component" means a distinct and identifiable element or constituent of a product.
- "Identifiable element" means an element that can be recognized, distinguished, or discerned, even when not visually evident, as in the case of a mixture or formulation.

Reporting should be done at the lowest practical component level that allows the PFAS use and function to be understood. Overly broad components may not provide sufficient clarity, while unnecessary subdivision is not required if it does not add meaningful information.

Example: A car radio. The radio could have a printed circuit board, a protective screen film, and wire coating that contain PFAS. Reporting “car radio” as a component would not provide clarity on where or why PFAS are being used within that component. However, if the reporter enters a component called “radio printed circuit board” “radio screen film” and “radio wire coatings” and then the respective PFAS information, that would provide enough detail to discern where and why the PFAS are used within a car radio.

At what level do I report the PFAS concentration range?

PFAS concentration is reported at the component level, unless the product itself is a homogenous material (ex: film, raw material chemicals, fabrics, o-ring, etc)

How do I report a product that has multiple PFAS containing components in it?

The Brand Name, Product Model, Product Code Type, Product Code, will repeat each time there is a component reported for that overarching product. Each component listed will then have its respective PFAS information reported.

1	Brand Name	Product Model	Product Code Type	Other Code Type Name	Product Code	Component	PFAS Identifier Type	Other PFAS Identifier Type Name	PFAS Name	PFAS Function	PFAS Range
2	USA Phones	FunPhone 14	SKU		123456	screen protector	TOF		TOF	UV stabilizer	100 ppm to <1,000 ppm (0.1 %)
3	USA Phones	FunPhone 14	SKU		123456	wire coating	CASRN		PTFE	Insulator	90 to 100 %
4	USA Phones	FunPhone 14	SKU		123456	battery	CASRN		PVDF	Binder	1,000 ppm to <10,000 ppm
5	USA Phones	FunPhone 14	SKU		123456	battery	CASRN		LITFSI	Ion exchange agent	1,000 ppm to <10,000 ppm
6	USA Phones	FunPhone 14	SKU		123456	battery	CASRN		PTFE	binder	150,000 ppm to <300,000 ppm

How do I report multiple PFAS functions for the same chemical?

If the component of a product has a PFAS chemical that provides multiple functions to the component, each will have to be listed out in a separate line.

1	Brand Name	Product Model	Product Code Type	Other Code Type Name	Product Code	Component	PFAS Identifier Type	Other PFAS Identifier Type Name	PFAS Name	PFAS Function	PFAS Range
2	Xtreme Outdoors	ShredPants	HTS		6203.43.11	Fabric	CASRN		PFOA	Barrier (Sealant)	1,000 ppm to <10,000 ppm (1 %)
3	Xtreme Outdoors	ShredPants	HTS		6203.43.11	Fabric	CASRN		PFOA	Waterproofing agent	1,000 ppm to <10,000 ppm (1 %)
4	Xtreme Outdoors	ShredPants	HTS		6203.43.11	Fabric	CASRN		PFOA	Anti-Stain agent	1,000 ppm to <10,000 ppm (1 %)

What if I don't see my chemical name/chemical function/component in a dropdown list?

Users can request a new entry be added to the chemical name, chemical function, or component dropdown lists by emailing your request to prism@theic2.org AND pfasreporting.mPCA@state.mn.us. Once the admin adds the entry, they will inform you and you will be able to redownload the reporting template and see the new entry. Alternatively, the admin may recommend a synonym on the existing list to use if it makes sense to do so.

How can I group similar products and/or product components?

There are three ways manufacturers can group similar products or product components when reporting.

1. Product grouping: When a manufacturer produces similar products that only differ in superficial qualities such as color or size but have a similar form and function, the products can be grouped if the same PFAS chemicals are used in the product and the PFAS chemicals are providing the same function.

Example: A paint manufacturer makes five different lines of indoor household paints. The same PFAS chemical is used in all five paints and are present in the same concentration ranges. The PFAS in the paints serve the same function(s). These paints could be grouped under one product reported.

1	Brand Name	Product Model	Product Code Type	Other Code Type Name	Product Code	Component
2	Paints R Us	Interior Pain Primer	HTS		3208.20.00	paint
3	Paints R Us	Interior Paint Premium, all finishes	HTS		3208.20.00	paint
4	Paints R Us	Interior Paint Ultra, all finishes	HTS		3208.20.00	paint
5	Paints R Us	Exterior Roll on Texture Paint	HTS		3208.20.00	paint

Example: A manufacturer makes a variety of tabletop fans that come in a variety of colors, sizes, and shapes. The manufacturer may choose to group the different fans into what the manufacturer calls product families. Under each of those product families they can list out the components containing PFAS.

1	Brand Name	Product Model	Product Code Type	Other Code Type Name	Product Code	Component
2	RadioShed	Cool Fan Series	UPC		123412341234	wire coating
3	RadioShed	Cool Fan Series	UPC		123412341234	o-ring
4	RadioShed	Cool Fan Series	UPC		123412341234	lubricant
5	RadioShed	Icytop Tabletop Fan Series	UPC		123412341235	wire coating
6	RadioShed	Icytop Tabletop Fan Series	UPC		123412341235	o-ring
7	RadioShed	Icytop Tabletop Fan Series	UPC		123412341235	lubricant
8	RadioShed	Icytop Tabletop Fan Series	UPC		123412341235	paint
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2. Component grouping: Within a product when there are multiple PFAS containing components, similar PFAS containing components can be grouped if they only differ in superficial qualities.

Example: A lawnmower manufacturer has a lawnmower that contains multiple components with PFAS. One of these components are gaskets. There are many gaskets throughout the mower made of PTFE. The component “gaskets” only need to be reported once as a component if they only differ superficial qualities, the PFAS in the gaskets provide the same function(s), and concentration of PTFE in each is within the same range (i.e., 90-100%).

3. Combining each grouping option: When reporting a product that contains many PFAS containing components, manufacturers should group products into product models or product families whenever applicable. Once those overarching products have been grouped, a manufacturer should then group all similar PFAS containing components where applicable.

Our company creates highly customizable products for our customers, what’s the best way to report these products?

There are a few options to consider when reporting products that can be highly customizable.

Remember that only components of these products that contain PFAS need to be reported. If a customizable component does not contain PFAS, it does not need to be included in this report.

If the product has customization options report all the customizable options under that base product, even if the product doesn’t always have all of those options when sold.

Example: An auto manufacturer is selling its “2026 Car model XYZ”. Along with the PFAS containing components that come standard with the car, there are also customizable options that buyers can add to their car. All of those options that have a component that contains PFAS should be added to your report under the “2026 Car Model XYZ” product.

Example: A fishing boat manufacturer offers customizable boats for their customers. It is not often that the manufacturer sells the exact same boat due to the wide variety of configurations and features they offer. The manufacturer should list all PFAS-containing customizable options under the base boat product. The manufacturer should group the customizable options wherever applicable.

Do I have to report spare/replacement parts separately?

Possibly, depending on three scenarios:

1. If spare or replacement parts made by the same manufacturer are reported as a component under the overarching product, they do not need to be reported separately as an individual product.

Example: A PFAS-containing gasket sold as a replacement for a machine part, already included in the original machine report → do not report separately.

Example: A new PFAS-containing filter sold separately, not previously reported as component of a product → report as a separate product.

2. Aftermarket parts produced by the same manufacturer may require to be reported if the PFAS-containing components do not fall into the product grouping allowed in rule (different PFAS composition, concentration range, function, or form).

Example: A PFAS-coated filter sold separately as an aftermarket replacement for a machine → report as a separate product if its PFAS composition or function differs from the original assembly.

Example: A replacement PFAS-coated gasket that is identical in composition, concentration, and function to the one already reported in the main assembly → does not need separate reporting.

3. Aftermarket parts by third-party manufacturers must be reported by those manufacturers.

Example: A third-party company makes PFAS-coated replacement filters for a hydraulic hose assembly. The original hose manufacturer does not report these filters. The third-party filter manufacturer must report them as separate products because they are PFAS-containing components entering Minnesota commerce.

How do I report foam blowing agents used in my product?

Report a component as “foam” or “foam insulation” and select the “Propellants, non-motive (blowing agents)” function.

Do I need to report containers or packaging for my product?

Packaging or containers which are integral to contain, protect, or dispense a product are considered product components and must be reported if they contain intentionally added PFAS.

Manufacturers of containers or packaging as a standalone product must report their products if they contain intentionally added PFAS.

I’m a consultant who will be reporting on behalf of a company. How do I make this request in PRISM?

Consultants should create an account using their consulting company information when they register. Once the consultant’s account is registered, the consultant can search for and request to report for its client companies following the instructions in the “Associations” section of the [PRISM Reporting Guide](#).

My trade association wants to report on behalf of a group of manufacturers. How do I make this request in PRISM?

An association should create an account using its association information when registering. Once the association's account is registered, account holder can search for and request to report for any member companies following the instructions in the "Associations" section of the [PRISM Reporting Guide](#).

I'm a manufacturer reporting on behalf of multiple retailers that sell my product. What's the easiest way for me to report for all of them?

Ensure you have requested authorization for each company you wish to report on behalf of in the PRISM system (see "Associations" in the [PRISM Reporting Guide](#)). Create a report on behalf of first retailers you are reporting for. You can then create a copy of the report either after it is submitted or while still in draft (see "Submitted Reports" in the [PRISM Reporting Guide](#)) and assign the next company to the copy of the report. From there you can edit the report as needed. and assign the next company to the copy of the report. From there you can edit the report it as needed.

What if my information from my supply chain is incomplete?

Report the information you have obtained by the reporting deadline using options allowed in the reporting system. Continue to request information and make updates as required by Minn. R. 7026.0080 and Minn R. 7026.0040, Subp. 1. A. (2) to your report as new information becomes available by Feb. 1 of the following year. Maintain documentation of these continued efforts to obtain all relevant PFAS information from your supply chain. MPCA staff may review this documentation to evaluate compliance with this rule and ensure due diligence has been met.

My supplier has informed me that a product or component we buy from them has PFAS but does not the specific chemical name, how should I report this?

Select the "PFAS Present but unknown at this time" option in the PFAS chemical list. Continue to request information and make updates as required by Minn. R. 7026.0080 and Minn R. 7026.0040, Subp. 1. A. (2) to your report as new information becomes available by Feb. 1 of the following year. Maintain documentation of these continued efforts to obtain all relevant PFAS information from your supply chain. MPCA staff may review this documentation to evaluate compliance with this rule and ensure due diligence has been met.

What if the function of the PFAS chemical is unknown in the product or component I am reporting?

Select the "Function unknown at this time" option in the function list. Continue to request information and make updates as required by Minn. R. 7026.0080 and Minn R. 7026.0040, Subp. 1. A. (2) to your report as new information becomes available by Feb. 1 of the following year. Maintain documentation of these continued efforts to obtain all relevant PFAS information from your supply chain. MPCA staff may review this documentation to evaluate compliance with this rule and ensure due diligence has been met.

My supplier has informed me that a product or product component we buy from them has PFAS but not the concentration, how should I report this?

If this is due to trade secret concerns from your supplier, you could request they report that component on behalf of your company so you would not need to report it.

If the PFAS concentration is not known from the supplier but you know the PFAS chemical, you can select the “Unknown” option in the PFAS Range dropdown.

Testing the product or component for PFAS is an option if the two scenarios above do not work.

Total organic fluoride (TOF) testing is allowed in lieu of unknown PFAS chemicals used in the product or if a commercially available analytical method is not available for the specific PFAS chemical.

How do I report TOF results?

When using TOF results to report PFAS information, select the “TOF” option in the “PFAS Identifier Type” column and select “TOF” in the PFAS Name column. Report the TOF results in the “PFAS Range” in the concentration option ranges provided.

F	G	H	I	J	K
Component	PFAS Identifier Type	Other PFAS Identifier Type Name	PFAS Name	PFAS Function	PFAS Range
plate coating	TOF		TOF	Waterproofing agent	300,000 ppm to <600,000 p

How do I request trade secret status on my chemical name and chemical identification number?

On the entry line for which you wish to request trade secret status, select “Yes” in the “Trade Secret” column. If “Yes” is selected, you will need to provide a subclass for the chemical that will appear on public searches instead of the chemical name and chemical identification number. Your report will not validate if a subclass is not selected when the Trade Secret column is marked “Yes”.

I	J	K	L	M	O
PFAS Name	PFAS Function	PFAS Range	Trade Secret	Trade Secret Chemical Sub-Class	
Perfluorooctanoic acid (PFOA)	Anti-Stain Agent	1,000 ppm to <10,000 ppm	Yes		
				Perfluoroalkyl substances	
				Polyfluoroalkyl substances	
				Fluoropolymers	
				Polymeric perfluoropolyethers	
				Side-chain fluorinated polymers	
				Functional group(s) other than alkyls present	

How are PFAS subclasses broken down within PRISM?

PFAS subclasses are broken down as follows:

- Non-polymers:
 - Subclass: Perfluoroalkyl substances
 - Includes: Perfluoroalkyl acids (PFAAs), Perfluoroalkyl carboxylic acids/ Perfluoroalkyl carboxylates (PFCAs), Perfluoroalkane sulfonic acids/ Perfluoroalkyl sulfonates (PFSAs), Perfluoroalkane sulfonamides (FASAs)
 - Subclass: Polyfluoroalkyl substances
 - Includes: Fluorotelomer-based substances, Perfluoroalkane sulfonamido substances, Polyfluoroalkyl ether carboxylic acids
- Polymers:
 - Subclass: Fluoropolymers
 - Subclass: Polymeric perfluoropolyethers (PFPE)
 - Subclass: Side-chain fluorinated polymers
- Other: Functional groups(s) other than alkyls present

Can I start with last year's report when I make my annual update report?

Yes. Use the copy report function (see "Submitted Reports" in the PRISM Reporting Guide) to start with last year's data and make edits as necessary.

Who do I contact with questions?

If you experience technical issues within the PRISM system, please email prism@theic2.org for assistance.

If you have questions on how to report specific scenarios not covered in this supplemental guide, please email pfasreporting.mPCA@state.mn.us.