



## NEW MEXICO PFAS REPORTING REQUIREMENTS

### What is PFAS?

Per- and Polyfluoroalkyl Substances (PFAS), often called "forever chemicals," are a group of synthetic chemicals characterized by their resistance to water, oil, and heat, providing durability across various products. Due to strong carbon-fluorine bonds, PFAS chemicals persist in the environment, raising significant health and environmental concerns. Within the RV industry, PFAS may be present in textiles, upholstery, carpets, sealants, adhesives, various coating applications such as weatherproofing and UV resistance, and more.

### Understanding New Mexico House Bill 212

New Mexico recently enacted [New Mexico House Bill 212](#), expanding regulation of PFAS chemicals and establishing stringent reporting and prohibition guidelines aimed at reducing PFAS contamination and exposure.

### What You Need to Know

Key Dates and Requirements:

- **January 1, 2027:** Mandatory reporting begins for manufacturers and suppliers whose products contain intentionally added PFAS, detailing type, quantity, and usage.
- **January 1, 2028:** Prohibition of the sale, manufacturing, and distribution of products with intentionally added PFAS in key categories including:
  - Carpeting and rugs
  - Upholstered furniture
  - Fabric and textile treatments
  - Sealants and adhesives
- **The RV Industry Association has secured a partial vehicle exemption.**

## RV and Vehicle Exemptions

Vehicles, including motorized and towable RVs, are exempt from the reporting and prohibition requirements, except for certain specified refrigerants and textile articles. New Mexico House Bill 212 defines:

- “Carpets or rug” as “a fabric marketed or intended for use as a floor covering.”
- “Textile” as “an item made in whole or in part from a natural or synthetic fiber, yarn or fabric, including leather, cotton, silk, jute, hemp, wool, viscose, nylon or polyester.”
- “Textile Furnishings” as “A textile product made in whole or part from a natural or synthetic fiber, yarn, or fabric that is used as furniture or a decorative accessory.”

The law states:

“A motor vehicle or motor vehicle equipment regulated under a federal motor vehicle safety standard, as defined in 49 United States Code, Section 30102(a)(10), and any other motor vehicle, including an off-highway vehicle or specialty motor vehicle, such as an all-terrain vehicle, side-by-side vehicle, farm equipment or personal assistive mobility device, except that the exemption under this paragraph does not apply to any textile article or refrigerant that is included in or as a component part of such products;”

## Refrigerant Exemptions

Under New Mexico House Bill 212, certain refrigerants containing intentionally added PFAS are regulated. However, refrigerants classified by the U.S. Environmental Protection Agency's Significant New Alternatives Policy (SNAP) program as "acceptable subject to use conditions" or "acceptable for narrowed use limits" are exempt from these prohibitions, provided they comply with federal guidelines. The [SNAP list](#) details approved refrigerants but has not been recently updated by the EPA. To identify refrigerants prohibited for use in New Mexico, consult the EPA's SNAP list of [unacceptable refrigerants](#).

## Key Impacts on the RV Industry

While motorized and towable RVs are generally exempt, manufacturers and suppliers may still be subject to the requirements for refrigerants and textile articles. This requires comprehensive supply chain tracking, transitioning to compliant, PFAS-free alternatives, and detailed documentation practices. Non-compliance may lead to significant penalties, fines, or sales restrictions within New Mexico, emphasizing the importance of proactive compliance strategies.

## Conclusion

Staying ahead of these regulations is crucial for minimizing risk and ensuring ongoing market access in New Mexico.

Immediate action and proactive management are essential to meet New Mexico House Bill 212 compliance requirements. Manufacturers and suppliers should:

- Implement supply chain audits and management practices.
- Engage actively with industry updates provided by RV Industry Association.