

PFAS Labeling Requirements in Connecticut

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Per- and polyfluoroalkyl substances (PFAS) have become a major focus of state regulation across the country. Connecticut has adopted a phased approach that initially permits the sale of certain products containing intentionally added PFAS if manufacturers provide consumer disclosures, but ultimately transitions many product categories toward outright prohibition.¹ Connecticut's framework differs from those adopted by several other states and raises important compliance, business, and operational considerations for manufacturers that distribute products nationwide.

I. Connecticut's PFAS Labeling Statute

Connecticut General Statutes § 22a-903c regulates the sale of certain products containing intentionally added PFAS. Beginning July 1, 2026, manufacturers may manufacture, sell, offer for sale, or distribute certain products containing intentionally added PFAS only if those products bear a compliant label.²

The labeling requirement applies to apparel, carpets or rugs, cleaning products, cookware, cosmetic products, dental floss, fabric treatments, juvenile products, menstruation products, textile furnishings, ski wax, and upholstered furniture.³ To comply with the statute, labels must: (1) be clearly visible before the sale; (2) inform the purchaser, using words or symbols approved by the Department of Energy & Environmental Protection (DEEP), that PFAS are present in the product; and (3) be constructed of sufficiently durable materials that will remain legible for the product's useful life.⁴ The statute also requires manufacturers selling covered products in Connecticut to provide prior notification to DEEP.⁵

Ultimately, this labeling regime in Connecticut serves as a transitional measure before total prohibition. Beginning January 1, 2028, the sale of many products containing intentionally added PFAS will be prohibited entirely.⁶

II. Connecticut's Approach Compared to Other States

Although Connecticut has adopted a disclosure-based approach during the transition period, other states have pursued significantly different regulatory strategies.

Maine

Maine has adopted one of the nation's most restrictive PFAS frameworks. Rather than relying primarily on consumer-facing disclosures, Maine has implemented phased prohibitions on products containing intentionally added PFAS. Many product categories became prohibited starting January 1, 2026, and Maine ultimately intends to impose a near-universal ban by 2032 unless a use is deemed "currently unavoidable."⁷

California

California has also generally favored product prohibitions rather than broad disclosure requirements, using labeling only as a narrow transitional mechanism. Unlike Connecticut, however, California does not maintain a comprehensive PFAS labeling regime applicable across multiple product categories. California also requires manufacturers to use the "least toxic alternative" when removing PFAS from textile articles, a provision absent from Connecticut's statute.⁸

Colorado

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Colorado's statute prohibits the sale of certain products containing intentionally added PFAS, while requiring disclosures for certain products during transition periods-- making it structurally very similar to Connecticut's statute.⁹ Colorado has, however, adopted more prescriptive labeling requirements than Connecticut. For example, cookware containing intentionally added PFAS must include specific bilingual disclosures and provide customers with additional information through a QR code.¹⁰

Minnesota

Minnesota has adopted a reporting-focused approach. Rather than emphasizing consumer-facing labels, Minnesota's Amara's Law requires manufacturers to submit detailed information regarding PFAS-containing products to the state and establishes phased prohibitions on products containing intentionally added PFAS.¹¹

New York

New York generally regulates PFAS through product restrictions and manufacturer certifications rather than broad labeling requirements. Unlike Connecticut, New York does not require consumer-facing PFAS labels for most products and instead relies primarily on sales restrictions and compliance certifications.¹²

III. Potential Downsides of Connecticut's Labeling Regime

While Connecticut's approach provides manufacturers with a temporary pathway to continue selling products containing intentionally added PFAS, the labeling requirements create several challenges.

Increased Compliance Costs

Many manufacturers rely on complex, multi-tiered global supply chains. Suppliers may not know, or may not disclose, whether trace amounts of PFAS were used during manufacturing. As a result, manufacturers may be required to undertake extensive supply-chain reviews to determine whether products contain intentionally added PFAS.¹³ Connecticut's statute further authorizes DEEP to require manufacturers to furnish a certificate of compliance signed by an authorized official.¹⁴ Maintaining documentation systems capable of producing such certifications on demand may impose continuing administrative costs.

Consumer Perception Risks

Mandatory PFAS disclosures may create significant reputational concerns for manufacturers. A product label indicating the presence of PFAS could discourage consumers from purchasing products, even when PFAS use is lawful and not yet prohibited, often while it serves a functional purpose for which there is no alternative. The required disclosure may cause consumers to avoid labeled products in favor of unlabeled alternatives, including products from states or countries not subject to Connecticut's requirements.

The risk is compounded by the fact that Connecticut's required disclosure does not distinguish between different PFAS compounds. Consumers may associate all PFAS-containing products with highly publicized compounds such as PFOA and PFOS, even where a product contains different fluorinated compounds that present different risk profiles and for which there has been no finding of adverse health effects associated with their use.¹⁵

Patchwork Regulatory Burdens

Connecticut's statute also contributes to an increasingly fragmented regulatory landscape. States have adopted varying definitions of "intentionally added PFAS," different reporting requirements, and different implementation timelines. This lack of uniformity can complicate interstate commerce and increase compliance costs for manufacturers operating nationwide.¹⁶

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IV. Implications for Companies Selling Products Nationwide

For manufacturers selling products among multiple states, Connecticut's law presents difficult strategic choices.

Option One: Connecticut-Specific Packaging

Some companies may elect to create Connecticut-specific packaging and labeling for covered products sold within the state. This approach would allow manufacturers to limit PFAS disclosures to Connecticut but would require separate packaging and distribution controls.

Option Two: Nationwide PFAS Labeling

Companies may conclude that maintaining multiple packaging systems is impractical and instead apply PFAS disclosures to products sold nationwide. Businesses often adopt the most restrictive state standard across all markets to simplify their compliance. This strategy may be complicated, however, by differences among states regarding what qualifies as "intentionally added" PFAS. Furthermore, key terms which may seem synonymous have also been interpreted differently by various state statutes (such as "textile articles" and "apparel," or "juvenile products" and "children's products") making it difficult to create a label that complies with each threshold.¹⁹

Option Three: Reformulation

Manufacturers may attempt to reformulate products to eliminate intentionally added PFAS to avoid labeling altogether. While potentially attractive as a long-term solution, reformulation can be costly and technically challenging because the performance characteristics that make PFAS desirable are often difficult to replicate.²⁰

Option Four: Market Withdrawal

Finally, some manufacturers may determine that compliance costs and operational burdens outweigh the benefits of selling in Connecticut's market. For those companies, withdrawal may become the most economically rational option.

As more states continue to adopt differing PFAS requirements, navigating this evolving regulatory landscape will likely remain a significant challenge for manufacturers in the years ahead.

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¹ Conn. Gen. Stat. § 22a-903c.

² Connecticut Department of Energy & Environmental Protection, *PFAS in Products*, <https://portal.ct.gov/deep/p2/pfas-in-products> (last visited June 18, 2026); Conn. Gen. Stat. § 22a-903c.

³ Conn. Gen. Stat. § 22a-903c.

⁴ Conn. Gen. Stat. § 22a-903c.

⁵ Conn. Gen. Stat. § 22a-903c.

⁶ Conn. Gen. Stat. § 22a-903c; Connecticut Department of Energy & Environmental Protection, *PFAS in Products*, <https://portal.ct.gov/deep/p2/pfas-in-products> (last visited June 18, 2026).

⁷ Me. Rev. Stat. tit. 38, § 1614.

⁸ Conn. Gen. Stat. § 22a-903c; Cal. Health & Safety Code § 108971 (West 2003).

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⁹ Colo. Rev. Stat. Ann. § 25-15-604; Conn. Gen. Stat. § 22a-903c.

¹⁰ Colo. Rev. Stat. Ann. § 25-15-604.

¹¹ Minn. Stat. § 116.943.

¹² N.Y. Envtl. Conserv. Law § 37-0121.

¹³ Karthik N.D., *Navigating PFAS Regulations in Consumer Products: Challenges and Opportunities*, LinkedIn (Sept. 19, 2024), <https://www.linkedin.com/pulse/navigating-pfas-regulations-consumer-products-challenges-karthik-n-d-mkbic/>.

¹⁴ Conn. Gen. Stat. § 22a-903c.

¹⁵ ASTM E1527-21 *Updated Standards for Phase I Environmental Site Assessments*, Practical Law Real Estate (Thomson Reuters), Westlaw.

¹⁶ Jenn Springman, *A Patchwork of Regulations Stifles Innovation and Commerce*, Goldwater Inst. (Sept. 29, 2025), <https://www.goldwaterinstitute.org/a-patchwork-of-regulations-stifles-innovation-and-commerce/>.

¹⁷ Jenn Springman, *A Patchwork of Regulations Stifles Innovation and Commerce*, Goldwater Inst. (Sept. 29, 2025), <https://www.goldwaterinstitute.org/a-patchwork-of-regulations-stifles-innovation-and-commerce/>.

¹⁸ Lavanya, *State PFAS Regulations 2026: Bans, Labeling, & Compliance for Manufacturers*, Certivo (Mar. 11, 2025), <https://www.certivo.com/blog-details/state-pfas-regulations-2026-bans-labeling-compliance-for-manufacturers>

¹⁹ Matthew Thurlow, *State Regulation of PFAS in Consumer Products Continues to Gain Momentum in 2026*, Morgan Lewis, (January 21, 2026), <https://www.morganlewis.com/pubs/2026/01/state-regulation-of-pfas-in-consumer-products-continues-to-gain-momentum-in-2026>

²⁰ Karthik N.D., *Navigating PFAS Regulations in Consumer Products: Challenges and Opportunities*, LinkedIn (Sept. 19, 2024), <https://www.linkedin.com/pulse/navigating-pfas-regulations-consumer-products-challenges-karthik-n-d-mkbic/>.