AUTO CARE ASSOCIATION | STATE PFAS COMPLIANCE SERIES

Illinois PFAS Compliance

Public Act 104-0231 (HB 2516, enacted August 2025).
Sales bans begin January 1, 2032



WHAT IS PFAS?

Per- and polyfluoroalkyl substances (PFAS) are a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom. Illinois bans **intentionally added** PFAS: PFAS deliberately added during manufacture where their continued presence is desired for a specific function in the final product. PFAS present only because of water containing PFAS are excluded if the manufacturer took no action causing their presence.

KEY DATES

Date	What happens
Aug 1, 2027	Illinois Environmental Protection Agency (IEPA) report to the General Assembly on fluoropolymers. Not a compliance date
Jan 1, 2032	Banned: cosmetics, dental floss, juvenile products, menstrual products, intimate apparel with intentionally added PFAS

AUTOMOTIVE AFTERMARKET PRODUCTS IN SCOPE

- **Juvenile products, Jan 1, 2032:** includes child car seats.
- **No reporting requirement** and no cleaning product or textile ban.
- **Fluoropolymers:** the enacted law has no fluoropolymer exemption. The IEPA report will assess fluoropolymers in consumer products, including critical uses and supply chain relationships.

HOW TO COMPLY

Manufacturers and suppliers

- Confirm child car seats sold in Illinois will be PFAS-free by Jan 1, 2032
- Watch the Aug 1, 2027 fluoropolymer report if your products use fluoropolymer coatings or lubricants

Distributors and retailers

- Stop selling banned juvenile products with intentionally added PFAS on Jan 1, 2032

RESOURCES

Public Act 104-0231

Association questions: govaffairs@autocare.org

Current as of October 21, 2026. For awareness only, not legal advice. Confirm obligations with IEPA or your counsel.