AUTO CARE ASSOCIATION | STATE PFAS COMPLIANCE SERIES

Vermont PFAS Compliance

9 V.S.A. 2494e et seq. (Act 131 of 2024, as amended by Act 54 of 2025).
Enforced by the Attorney General's Office



WHAT IS PFAS?

Per- and polyfluoroalkyl substances (PFAS) are a class of fluorinated chemicals. Vermont bans **intentionally added** PFAS in listed products. For textiles, the ban also reaches PFAS at or above 100 ppm total organic fluorine, dropping to 50 ppm on July 1, 2027.

WHO MUST COMPLY

The prohibitions apply to manufacturers: any person that makes or assembles a consumer product. Distributors and retailers are not manufacturers, except that for products made outside the United States, the importer or first domestic distributor is the manufacturer.

KEY DATES AND SALES BANS

Date	What happens
Jan 1, 2026	Banned: aftermarket stain and water-resistant treatments, artificial turf, incontinency protection products, juvenile products, residential rugs and carpets, ski wax, textiles and textile articles
July 1, 2027	Banned: cleaning products, dental floss. Textile threshold drops to 50 ppm. Covered products sold in fluorine-treated containers banned
July 1, 2028	Banned: cookware
Jan 1, 2032	Fluorine-treated containers, and consumer products in them, banned

HOW TO COMPLY

Manufacturers and importers

- Confirm which products contain intentionally added PFAS or exceed the textile threshold
- Get counsel's read on cleaning and protectant products before July 1, 2027
- Collect supplier certificates of compliance
- Check containers for fluorine treatment before July 1, 2027

Distributors and retailers

- Prohibitions fall on manufacturers, but act on any manufacturer notice that a product cannot be certified
- Ask suppliers to confirm PFAS status

RESOURCES

9 V.S.A. 2494e (definitions) | 9 V.S.A. 2494f (prohibitions) | Attorney General PFAS guidance
Agency questions: AGO.PFASproducts@vermont.gov, 802-828-3171 | Association questions: govaffairs@autocare.org

Current as of October 21, 2026. For awareness only, not legal advice. Confirm obligations with the Vermont Attorney General's Office or your counsel.

WHAT TO REPORT

Vermont has no product reporting requirement. On request, the Attorney General can require a certificate of compliance; a manufacturer may rely on its supplier's certificate. A manufacturer that cannot certify must notify the businesses selling the product and send the Attorney General the list.

AUTOMOTIVE AFTERMARKET PRODUCTS

Vermont's statute and the Attorney General's guidance do not name automotive products. The categories to review:

- **Cleaning products, July 1, 2027:** compounds for routine cleaning. The definition lists general purpose, bathroom, glass, carpet, floor, and hand soap products and does not mention automotive products.
- **Aftermarket stain and water-resistant treatments, since Jan 1, 2026:** treatments for textile and leather products used in residential settings.
- **Textile articles:** excludes a vehicle or its component parts.

Companies selling automotive cleaning, appearance, or interior protectant products should decide with their own counsel how these categories apply.

EXEMPTIONS AND ENFORCEMENT

- Products previously used by a consumer for their intended purpose
- The Attorney General may postpone a compliance date by up to one year where production by the deadline is not feasible; the manufacturer must show this
- Violations are enforced under the Vermont Consumer Protection Act, with civil penalties of up to $10,000 per violation and a private right of action