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# *The 2025 US Product Compliance Guide: Key Federal and State Changes*

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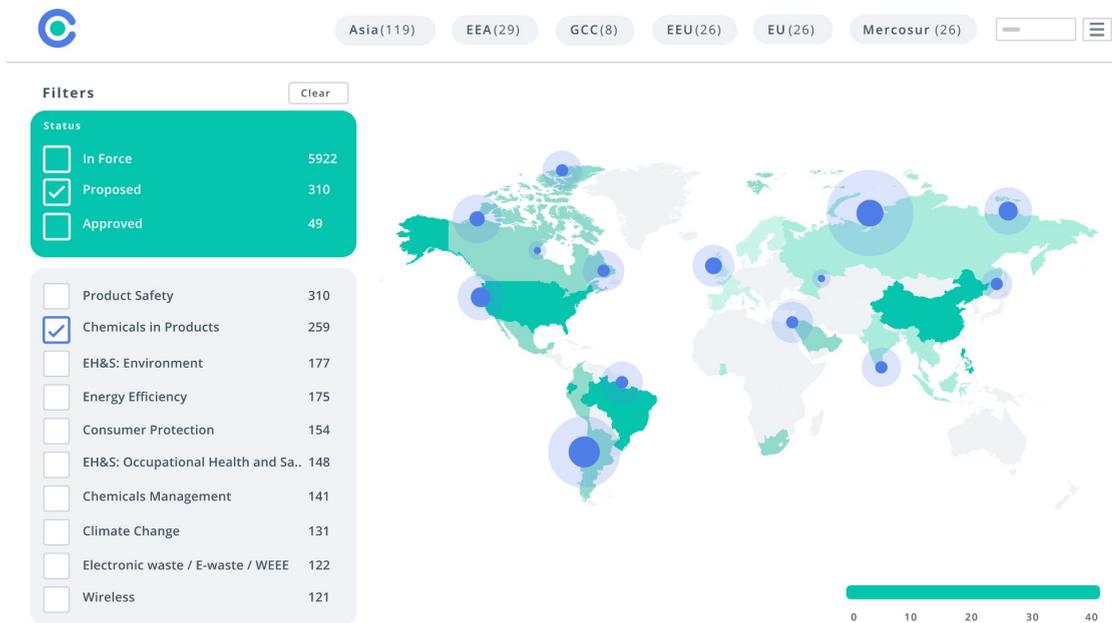
# Table of Contents

## The 2025 US Product Compliance Guide: **Key Federal and State Changes**

- 01. Introduction**
- 02. Federal Overview & State Emphasis**
- 03. PFAS: A Wave of Federal and State Restrictions**
- 04. EPR: The Rise of State-Level Packaging Laws**
- 05. EPR Expansion: Beyond Packaging to Batteries, Electronics, and More**
- 06. Right to Repair: A Growing Movement for Consumer Electronics and Appliances**
- 07. The Future of Right to Repair: From Automotive to Medical Equipment**
- 08. Webinar Q&A**
- 09. Conclusion**

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# 01. Introduction

The regulatory landscape for product compliance in the United States is currently undergoing significant and dynamic changes at both the federal and state levels.

This guide serves as a comprehensive overview of these critical developments, offering insights derived from the webinar "[US Product Compliance 2025: Key Federal & State Changes to Watch](#)" hosted by Compliance & Risks.

It provides a comprehensive overview of these developments, including deregulation efforts, new state-level restrictions on PFAS, and the expansion of Extended Producer Responsibility (EPR) and Right to Repair laws. It is designed to help companies understand and navigate the complex and evolving regulatory environment to ensure their products remain compliant.

Watch the [full webinar](#) for more details.

We begin by examining the general overview of the US federal regulatory landscape, which is currently in a state of flux due to deregulatory efforts.

Following this, our experts delve into the specific areas where states are taking the lead in creating new regulations, particularly in response to a perceived lack of federal action. The subsequent chapters will focus on three major topics: the proliferation of PFAS restrictions and reporting requirements, the expansion of Extended Producer Responsibility (EPR) programs for packaging and other products, and the growing momentum of the Right to Repair movement.

The guide aims to provide a clear and actionable summary of these changes, including details on specific laws, deadlines, and compliance obligations, ensuring that readers can effectively manage their product compliance strategies and protect their brands.

## 02. Federal Overview & State Emphasis

The federal regulatory landscape in the United States is currently in a state of flux, largely driven by deregulatory efforts.

Since January 20, 2025, approximately 170 executive orders (EOs) have been issued, primarily to direct executive branch officials. While EOs do not have the force of law, they are grounded in the Constitution or existing statutes and can be challenged by other branches of government, such as the courts or Congress. For instance, about one-third of President Trump's EOs have been or are being challenged in court.

An example of a deregulatory EO is EO 14192, issued on January 31, 2025, which mandates a "10 to 1 rule". This rule states that for every new regulation issued, at least 10 prior regulations must be identified for elimination. However, eliminating regulations cannot be done solely through an EO; it requires specific agency procedures or a new law passed by Congress.

Federal deregulation efforts are also evident in specific agencies like the Department of Energy (DOE) and the Consumer Product Safety Commission (CPSC). For example, four energy conservation standards related to products like water heaters and walk-in coolers were nullified on May 9, 2025, by congressional joint resolutions signed by the president.

The DOE also announced a proposal on May 12, 2025, to eliminate or reduce 47 additional regulations, including those for consumer appliance standards. Similarly, the CPSC, which is responsible for protecting consumers from unreasonable risks of injury, published a notice on June 12, 2025, inviting public comment on ways to reduce regulatory costs and burdens without increasing consumer risk.

The deadline for these comments was August 11, 2025. In contrast to the federal approach, many US states are stepping in to fill regulatory gaps, particularly in areas like PFAS, Extended Producer Responsibility (EPR), and Right to Repair.



# 03. PFAS: A Wave of Federal and State Restrictions

Per- and polyfluoroalkyl substances (PFAS) are a class of synthetic chemicals used since the 1940s for their resistance to heat, water, and oil.

These "forever chemicals" are found in a wide variety of products, including nonstick cookware, water-repellent fabrics, and firefighting foam.

A primary concern with PFAS is their persistence and ability to accumulate in humans, animals, and the environment over time.

The EPA notes that exposure to certain levels of PFAS may lead to health issues such as reproductive and developmental effects and an increased risk of some cancers.

The EPA is actively increasing its management efforts for PFAS by issuing advisories and developing national drinking water regulations. At the federal level, the EPA has issued an interim final rule to delay the start of the PFAS reporting period under the Toxic Substances Control Act (TSCA).

The new reporting window is from April 13, 2026, to October 13, 2026, with an extended deadline for small manufacturers who only import PFAS as article products until April 13, 2027.

A separate rule, effective October 2023, requires anyone who manufactured or imported PFAS between January 1, 2011, and the end of 2022 to report detailed information to the EPA.

This includes data on how PFAS was made, used, and disposed of, regardless of whether it was a byproduct or if the company is a small business. The EPA has also updated toxic chemical release reporting regulations to include nine specific PFAS chemicals. This action was mandated by the National Defense Authorization Act for fiscal year 2020.

In addition to federal action, a wide range of US states have been enacting laws to restrict or ban PFAS in consumer products.

Maine has significantly strengthened its ban, with a phased prohibition on products containing intentionally added PFAS beginning in 2026 and extending to 2040.

The state's Department of Environmental Protection has also implemented a new rule, Chapter 90, which bans the sale of various products like cosmetics, cookware, and cleaning products starting January 1, 2026, unless a "currently unavoidable use" proposal is submitted and approved.

Other states are also implementing strict regulations. Minnesota prohibits the sale of specific products with intentionally added PFAS, such as rugs, cookware, and cosmetics, beginning January 1, 2025, with a full ban by 2032. Manufacturers in Minnesota must also report detailed information about any product containing PFAS by July 1, 2026.

Colorado's new law, effective May 1, 2024, phases out the sale of products with intentionally added PFAS, including cookware, dental floss, and artificial turf, with key deadlines in 2025, 2026, and 2028.

In California, a new law effective January 1, 2025, targets juvenile products, food packaging, and textile articles. It mandates manufacturers to register with the Department of Toxic Substances Control and provide a certified statement of compliance by July 1, 2029.

These state-level initiatives reflect a growing push to enhance product safety and exceed federal standards.



## 04. EPR: The Rise of State-Level Packaging Laws

Extended Producer Responsibility (EPR) has evolved from a niche environmental policy into a significant government strategy.

This is evidenced by the increasing number of states adopting or considering EPR for various product categories.

As of 2025, seven US states have enacted comprehensive EPR laws for packaging.

These laws require manufacturers to take financial and operational responsibility for the collection, recycling, and reuse of packaging and paper products.

Notable legislative successes in the first half of 2025 include Maryland and Washington signing packaging EPR laws.

Maine, a leader in environmental legislation, enacted its first packaging EPR law in 2021, and its rule came into effect in 2024 to reduce the burden on municipalities and improve packaging design.

Other states with enacted packaging EPR laws include Oregon, California, Colorado, and Minnesota. Some states, such as Hawaii, Connecticut, and Rhode Island, have opted to conduct needs assessments and viability studies before establishing an EPR program.

This trend signifies a shift in responsibility from municipalities to producers, aiming to create a more sustainable and efficient waste management system.

# 05. EPR Expansion: Beyond Packaging to Batteries, Electronics, and More

As states continue to drive forward with EPR, the scope of producer responsibility is expanding beyond packaging to other product categories.

For example, 23 states have already enacted EPR laws for electronics. A critical new focus is on batteries, particularly lithium-ion batteries, which are a major cause of fires at recycling facilities when improperly disposed of.

Nebraska and Colorado have already enacted legislation for batteries, and more states like Massachusetts, Minnesota, and Oregon have proposed bills.

Beyond electronics and batteries, other products are being considered for EPR programs.

Proposed legislation includes EPR for solar panels in Connecticut and household appliances and refrigerants in New York.

This trend indicates a continuous effort by states to address challenging waste streams and hold producers accountable for the entire lifecycle of their products, from design to end-of-life management.

The movement towards EPR is a key element of the broader shift towards a circular economy and sustainable product management.



## 06. Right to Repair: A Growing Movement for Consumer Electronics and Appliances

The Right to Repair movement is gaining momentum, with a clear trend toward more state-level regulation aimed at promoting sustainability and protecting consumers.

The first US state to legislate an automotive Right to Repair law was Massachusetts in 2013, which was later expanded in 2020 to include telematics. Since then, other states have followed suit with a significant increase in legislative activity in 2025. New York enacted the Digital Fair Repair Act in 2022, the first comprehensive law on consumer electronic repairs, requiring manufacturers to make parts, tools, and documentation available to independent repair providers and consumers on fair and reasonable terms.

California's Right to Repair Act, in force since January 1, 2024, provides consumer protection by mandating that manufacturers of electronic products and appliances provide the necessary parts and tools for repair for a minimum of 3 to 7 years, depending on the product's wholesale price.

A key development in this area is the ban on "parts pairing," which was first legislated in Oregon. Parts pairing involves software barriers that prevent consumers or independent repairers from replacing a part with one not "paired" or authorized by the original manufacturer.

This ban is considered a major step forward for the right to repair movement as it encourages the use of spare parts from defunct devices, which is a crucial aspect of repairability.

# 07. The Future of Right to Repair: From Automotive to Medical Equipment

The Right to Repair movement is expanding its focus to include a wider range of essential products, beyond just consumer electronics.

This is driven by a goal to eliminate a "throwaway culture" and provide consumers with long-term, sustainable solutions.

A notable trend in 2025 is the push to legislate Right to Repair for medical equipment and electric wheelchairs.

New legislation in states like Washington, Nevada, Rhode Island, and Maryland, for example, is specifically focused on ensuring that users of powered wheelchairs and other mobility devices have access to the necessary parts, tools, and information for repairs without being solely dependent on manufacturers.

Another developing area is the proposal of "repairability scores" for digital electronic equipment in states like New Jersey and Pennsylvania.

This would provide consumers with information about how easy or difficult a product is to repair before they make a purchase.

Furthermore, while the Right to Repair movement has been primarily state-driven, there is a proposed federal bill, the "REPAIR Act," which aims to ensure consumers have access to motor vehicle data, repair information, and tools.

Although a similar bill did not advance in 2023, the renewed focus at the federal level indicates the growing importance of this issue.

The trend is clear: Right to Repair is expanding its scope and gaining traction to protect consumers and promote product longevity.

## 08. Webinar Q&A

During the live webinar, numerous questions were sent in by our live audience. Our webinar presenters, [Kelly Bugiera](#), [Luisa Toro Correa](#), [Patricia Weathers](#) and [Samantha Anguiano](#) provided expert answers to the most popular queries below.

### Q1. Who tests for PFAS?

Importers and manufacturers must have their products or packaging tested to ensure they comply with PFAS restrictions or prohibitions that apply in various U.S. states, as well as federal PFAS legislation.

The EPA establishes standardized laboratory methods for analyzing PFAS in drinking water and oversees lab certification to ensure compliance with federal regulations. The FDA tests for PFAS in foods, develops detection methods for various foods, and conducts extensive sampling of U.S. food products.

State-certified, commercial analytical, and health agency laboratories, along with specialized global service providers, all play complementary roles in PFAS monitoring.

### Q2. Regarding PFAS, is there a file already available to know all the information required for the report?

Yes, the EPA provides a specific reporting tool and detailed instructions for reporting PFAS under TSCA Section 8(a)(7). This requirement applies to manufacturers and importers of PFAS for commercial use starting in 2011.

It explains what information must be reported, how to report it through the EPA's CDX system, and the reporting deadlines.

Under TSCA section 8(a)(7), EPA is required to establish a rule mandating that anyone who has manufactured (including imported) PFAS since 2011 report relevant data, including:

- The common or trade name, chemical identity, and molecular structure of each chemical or mixture;
- Proposed categories of use for each substance or mixture;
- Total amounts manufactured or processed, amounts for each use category, and estimates;
- Descriptions of byproducts from manufacture, processing, use, or disposal;
- All existing info on environmental and health effects;
- Number of exposed individuals, estimates, and exposure duration in workplaces;
- Disposal methods and any changes in disposal.

The following links offer a detailed explanation of potential questions about this rule.

I kindly recommend them as a helpful, supplementary resource.

- [FAQ documents](#)
- [TSCA Section 8\(a\)\(7\) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances](#)
- [Instructions for Reporting PFAS Under TSCA Section 8\(a\)\(7\)](#)

**Q3. Are the PROs already appointed? Will there be PROs able to take on several states?**

In states that have EPR laws in force, PROs and their procedures may already be in place. Yes there are companies that are active with PROs in multiple states.

**Q4. Do the packaging bills include only FMCG/B2C or also B2B/transport packaging?**

Most of the EPR legislation in force to date refers to B2C packaging, by calling out what is considered a "covered product, such as Washington's enacted Producer Responsibility for Packaging and Paper Products, SB 5284, Enacted, 2025, which defines "packaging" as a material, substance, or object that is used to protect, contain, transport, serve, or facilitate delivery of a product and is sold or supplied with the product to the consumer for personal, noncommercial use."

Oregon's SB 582, does state that the following are not considered "covered product": rigid pallets used as the structural foundation for transporting goods lifted by a forklift, pallet jack or similar device; specialty packaging items used exclusively in industrial or manufacturing processes, including but not limited to: (i) cores and wraps for rolls of packaging sold by a mill to a packaging converter or food processor; and pallet wrap or similar packaging.

Alternately, Illinois' Packaging & Paper Stewardship 103-0383 says "Packaging includes, but is not limited to, a material type, such as paper, plastic, glass, metal, or multi-material, that is: (1) used to protect, contain, transport, or serve a product; and (2) sold or supplied to consumers expressly for the purpose of protecting, containing, transporting, or serving products.

Producers may want to check legislation relating to supply chain due diligence requirements for additional guidance, as well as established national and industrial standards, such as ASTM D6198-18(2024) and ISO/IEC 17360:2023.

**Q5. New Jersey also has regulations for batteries?**

New Jersey is the first state to pass an EPR law for Electric and Hybrid Vehicle Battery Management Act.

This Act bans the disposal of propulsion batteries in NJ landfills after 8 January 2027, and holds propulsion battery producers responsible for the end-of-life battery management. Additionally producers must place permanent labels on the products to provide battery information beginning 1 January 2027.

Producers are responsible for the collection and management of their used propulsion batteries that are offered to the producer for take-back by the current battery owner.

If the battery is sold in a vehicle under the vehicle manufacturer's own brand, then the vehicle manufacturer is responsible for the battery.

**Q6. Same questions for WEEE and Batteries - does it apply to B2B products ?**

The state's Dry Cell Battery Management Act, P.L. 1991 c. 521, requires manufacturers of these dry cell batteries to assume the costs of, and accept the responsibility for, their environmentally sound collection, transportation, recycling or proper disposal.

There is a proposed amendment to this Act, Assembly Bill 3876, that would expand types of batteries and consumer products covered.

The state's Electronic Waste Management Act of 2007 bans the disposal of certain electronic devices such as computers and TVs in landfills. In this Act "Covered electronic device" means a desktop or personal computer, computer monitor, portable computer, or television sold to a consumer. This definition specifically excludes: "an electronic device that is functionally or physically a part of a larger piece of equipment designed and intended for use in an industrial, commercial, or medical setting, including diagnostic, monitoring, or control equipment."

**Q7. Can you link to where to comment for CPSC comments?**

You can submit comments to the CPSC's Request for Information on reducing regulatory burdens by August 11, 2025, referencing Docket No. CPSC-2025-0009. Comments may be submitted via the following methods:

1. Online at the Federal eRulemaking Portal: <https://www.regulations.gov/>
2. Mail / Hand Delivery / Courier:  
Office of the Secretary  
Consumer Product Safety Commission  
4330 East-West Highway  
Bethesda, MD 20814  
Tel: (301) 504-7479
3. Confidential submissions (e.g., trade secrets, confidential business information, or sensitive/protected content you do not wish to be public) may be submitted by mail, hand delivery, or emailed directly to: [cpsc-os@cpsc.gov](mailto:cpsc-os@cpsc.gov)

**Q8. Right to repair - is that also including medical devices e.g. in vitro diagnostics where that are validated etc before selling? We sell devices incl service agreement where we have field service engineer who comes and fixes problems. It is not easy to repair.**

There is currently no federal Right to Repair (R2R) legislation in the U.S., so any requirements related to spare parts must be assessed at the state level and may vary depending on the specific product category (e.g., medical devices, consumer electronics, appliances) and the jurisdiction in question.

As your question does not specify either of these, it is difficult to confirm whether the spare part obligations you listed are mandated. However, to provide an illustrative example, assuming you are referring to for example consumer electronic equipment, several states, such as New York, California, and Oregon, have enacted R2R laws. However, none of these statutes impose the specific requirements you mentioned (e.g., mandatory QR codes, spare part name references, delivery time restrictions, or pricing disclosures).

Instead, these laws generally require manufacturers to make existing documentation, tools, and parts available on fair and reasonable terms, but only if those resources already exist and are provided to authorized repair providers.

For instance:

New York's Digital Fair Repair Act (S.4104-A) requires manufacturers to make repair materials available if they already exist, but it does not require creating new materials or define how they must be provided (e.g., format, pricing, etc.).

California's SB 244 requires that parts and documentation be made available for three or seven years, depending on the product's wholesale price. However, this obligation applies only if those resources are already available. The law does not define when the availability period begins, nor does it mandate delivery timeframes, QR codes, or pricing transparency.

Oregon's SB 1596, effective January 1, 2025, prohibits parts pairing practices that hinder independent repair of consumer electronic equipment. Still, it does not impose requirements regarding delivery time, documentation format, or spare part pricing.

**Q9. The Minnesota reporting says intentionally added, but if we sell a product with an O-ring which contains PFAS will we have to report this?**

Under the regulation House File 2310, beginning January 1, 2025, the sale, offering for sale, or distribution of "products" containing "intentionally added PFAS" is prohibited in Minnesota for carpets or rugs; cleaning products; cookware; cosmetics; dental floss; fabric treatments; juvenile products; menstruation products; textile furnishings; ski wax; or upholstered furniture, except for those determined to involve currently unavoidable uses of PFAS.

According to the Regulation, "Intentionally added" refers to PFAS that are deliberately included during manufacturing when their presence in the final product or its components is intended for a specific purpose.

"Currently unavoidable use" describes a use of PFAS that the commissioner has designated as essential for health, safety, or societal functioning through a rule under this section, where alternatives are not reasonably accessible.

I would like to point out this definition: "Product component" means an identifiable component of a product, regardless of whether the manufacturer of the product is the manufacturer of the component.

The Minnesota Pollution Control Agency (MPCA) has extended the deadline to July 1, 2026, giving manufacturers more time to establish supplier agreements and familiarize themselves with a new reporting platform launching in fall 2025, which aims to simplify reporting.

The commissioner may add more PFAS-containing products through rulemaking from January 1, 2025, to January 1, 2032. Starting January 1, 2032, any product with intentionally added PFAS will be banned statewide unless the commissioner determines it is 'currently unavoidable,' and will specify such cases but cannot include the listed products.

Also, according to House Rule 2310, the testing requirements (Subdivision 4) and sale prohibitions (Subdivision 5) do not apply to prosthetic or orthotic devices, medical devices, drugs, or products used in medical settings or applications that the US FDA regulates.

In summation, the pivotal consideration pertains to whether PFAS is deliberately incorporated into the product component. If so, it is mandatory to report this in Minnesota in accordance with legal requirements and MPCA regulations.

**Q10. Right to Repair: Are there any common US mandatory requirements for spare parts such as**

**1- Mandatory paper and/or QR code documentation for spare part**

**2- Spare part's name reference on documentation**

**3- Restrictions on spare part delivery time.**

**4- Publish spare part's price online and on service center**

**5- From when the spare part availability period is counted: last purchased by customer, supplier's last sale date, product phase out dates or other dates.**

We are not sure whether the specific spare part requirements you listed are mandated in any U.S. state, as your question does not indicate which jurisdiction or product category you are referring to (e.g., medical devices, consumer electronics, appliances, etc.).

It is important to note that there is currently no federal Right to Repair legislation in the U.S. Instead, such legislation is enacted at the state level, and each state law applies to different product types and includes varying obligations.

For example, if your question pertains to consumer electronic equipment, states such as New York, California, and Oregon have enacted Right to Repair laws. However, none of these statutes impose the specific requirements you mentioned.

Instead, these laws generally require manufacturers to make existing documentation, tools, and parts available on fair and reasonable terms—but only if such resources are already provided to authorized repair providers.

For instance:

New York's Digital Fair Repair Act (S.4104-A) requires manufacturers to provide repair materials if they exist, but it does not impose an obligation to create such materials or specify how they must be delivered or priced.

California's SB 244 similarly requires manufacturers to provide parts and documentation for three or seven years, depending on the product's wholesale price. However, this applies only if those resources are already available, and the law does not define when the availability period begins (e.g., last customer purchase, product phase-out) nor does it mandate QR codes, delivery timelines, or price disclosures.

Oregon's SB 1596, which takes effect on January 1, 2025, applies to consumer electronic equipment and prohibits parts pairing practices that hinder independent repair. Still, it does not impose requirements on delivery times, documentation format, or pricing transparency.

Because these requirements vary and are entirely dependent on both product type and jurisdiction, we recommend clarifying the scope of your question to determine whether any of your listed criteria are addressed under applicable law.

**Q11. Do you know where the definition of "product" used in Maine, Minnesota, New Mexico, and the NEWMOA model legislation comes from? I find it to be a very confusing definition in particular on whether it is intended to include industrial products with no consumer application at all.**

The definition of "product" in PFAS laws typically relies on state statutes or model laws, often referencing consumer product regulations. For example, model PFAS legislation, such as that summarized by NEWMOA, frequently cites Minnesota's laws and TSCA.

Additionally, the text explains how "product" and "product component" are defined by different legislative bodies. Maine, Minnesota, New Mexico, and NEWMOA (Model Legislation 2023) all define "product" similarly as an item that is prepared or manufactured for sale and intended for various uses, often including parts. Maine and NEWMOA also clearly define "product component" as an identifiable part of a product, regardless of who manufactures it.

**Q12. I believe Minnesota has extended their reporting deadline to July 1, 2026, can you confirm?**

Correct, the Minnesota Pollution Control Agency (MPCA) has extended the original reporting deadline to July 1, 2026.

The six-month extension provides manufacturers additional time to establish agreements with suppliers to report on their behalf, as permitted in the proposed state rule, and become acquainted with a new reporting platform launching in fall 2025, which includes tools designed to make reporting easier.

**Q13. For EPR stewardship programs, who exactly needs to pay into them? Is it the seller in that state? The entity who imports the products? Or the original manufacturer? There may be redundancy here? Multiple companies paying into these EPR programs for the same product.**

It depends on the state, and most states in their EPR legislation identify a designated leadership body or council.

For example, Maryland's Extended Producer Responsibility for Packaging, SB 222 Enacted, 2023. Its definition of "Producer" does include the manufacturer, but it also includes the following:

with respect to packaging materials used to directly protect or contain a product sold, offered for sale, or distributed in the state:

1. a. has legal ownership of the brand of the product under which the product is sold;
2. is the licensee of the brand or trademark under which the product is sold, whether or not the trademark is registered in the state;
3. is the person who imports the product into the US for use in a commercial enterprise that sells, offers for sale, or distributes the item in the state.

However, a "Producer" is not "an entity that owns or operates a single retail sales establishment that has no online sales and is not supplied or operated as part of a franchise or a chain."

In Maryland, clarification on which entity must pay the PRO fees should be possible in consultation with the Producer Responsibility Advisory Council.

**Q14. For R2R, which state is the most stringent? Most manufacturers do not know which state their product will end up, so meeting the strictest is safest.**

We can provide general guidance regarding U.S. state-level Right to Repair (R2R) legislation. However, it is important to note that identifying which state imposes the most stringent obligations is not a straightforward determination. This assessment depends entirely on the specific product category and requires a careful review of the applicable legal frameworks in each jurisdiction where such laws exist.

In the United States, there is no overarching federal Right to Repair law. Instead, individual states have enacted their own legislation, each with distinct scopes, definitions, and obligations. Therefore, determining which regulation is the "strictest" first requires identifying the relevant product type (such as motor vehicles, consumer electronics, or household appliances) and then evaluating which state laws apply to that category.

For example, if the product in question falls under the category of motor vehicles, one reference point could be Massachusetts' Automotive Repair Act, House Bill 3757, 2013. This law applies to motor vehicles, including those equipped with telematics systems.

Manufacturers are required to provide vehicle owners and independent repair facilities with the same diagnostic and repair information made available to authorized dealers. Starting with model year 2022, the legislation mandates direct access to vehicle telematics data through a standardized, open-access platform - unless access is managed through a universal and independently-administered system.

If the product relates to digital electronic equipment, an illustrative example is New York's Digital Fair Repair Act, Senate Bill 4104, 2022. This law applies to digital electronic equipment sold or used in New York on or after July 1, 2023. It requires manufacturers to provide access to parts, tools, and repair documentation under fair and reasonable terms. However, the law excludes certain product types from its scope, including motor vehicles, medical devices, and household appliances.

If the product under consideration is an appliance, a relevant statute would be California's Right to Repair Act, Senate Bill 244, 2023. This legislation applies to electronic and appliance products with a wholesale price of USD 50 or more. Manufacturers must make available repair documentation, functional parts, and tools, including relevant updates, for a minimum of three or seven years, depending on the product's price. Covered items include household appliances such as refrigerators, microwaves, washers, and dryers, while equipment used in industrial, agricultural, or construction settings is excluded from scope.

These are just a few examples of how R2R requirements can vary significantly across states, depending on the product category. Each jurisdiction has its own legal framework, and compliance must be assessed individually based on the specific characteristics of the product in question.

**Q15. Most of the US states prohibit PFAS in cosmetics, textiles, cookware, etc. Do these PFAS regulations apply to consumer electronics products?**

Most current US PFAS regulations do not explicitly target consumer electronics; instead, they mainly restrict PFAS in cosmetics, textiles, cookware, food packaging, cleaning products, and similar items. Consumer electronics are generally not specifically mentioned.

However, a few states are moving towards broader PFAS bans that could include consumer electronics in the future. California's Proposition 65 may require warnings for consumer products, including electronics, if levels of PFOA, PFOS, its salts, PFNA, and its salts exceed certain limits. However, this is a warning, not a ban.

Some proposed legislation aims to establish reporting requirements for consumer products overall. As PFAS regulations expand, several states may eventually regulate consumer electronics unless an exemption is specified.

**Q16. With the state level EPR legislation, are there labeling requirements for packaging included in those laws? If so, can you outline those labeling requirements?**

Many states handle labelling of packaging, batteries, etc. under additional legislation. Exceptions to this are NY's Establishing Extended Producer Responsibility for Textiles (SB 3217) that states, "One year after the plan is approved...covered products sold or offered for sale in the state shall be accompanied by the name of the producer and the producer's contact information."

Also Iowa's Batter Producer Extended Responsibility(HB 726) proposes that "on and after January 1, 2029, the batteries or battery-containing products must also be marked to ensure proper collection and recycling."

Legislation wording also includes labeling requirements at collection sites.

A third example is Oregon's ( Packaging Producer Responsibility for Recycling, Senate Bill 582 Enacted, 2021, which requires, "Packaging for products: Identified by the commission by rule as product that is required by law to state on the label or container that the packaging should not be recycled or should be disposed of in a manner other than recycling," and it established the Truth in Labeling Task Force.

EPR legislation varies state to state, so each must be checked individually which is not ideal; however, the legislation in C2P can be searched easily.



## 10. Conclusion

The US product compliance landscape is characterized by a dynamic interplay between federal deregulation and proactive state-level regulation.

While federal agencies like the DOE and CPSC are pursuing efforts to reduce regulatory burdens, many states are moving in the opposite direction, enacting new and comprehensive laws for PFAS, EPR, and Right to Repair.

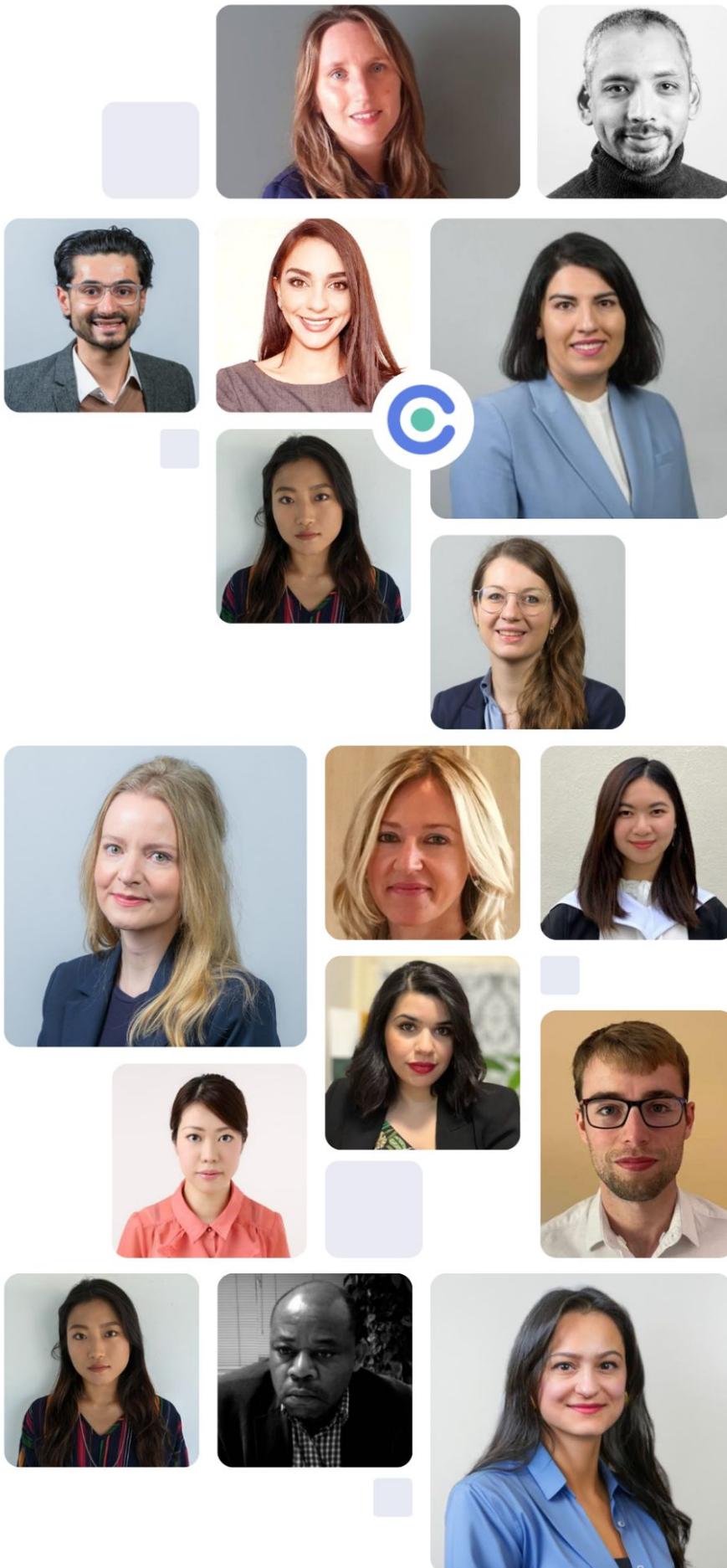
These state-level initiatives are not only filling regulatory gaps but are also setting new standards for product safety, sustainability, and consumer rights.

To remain compliant in this evolving environment, companies must actively monitor both federal and state-specific legislative developments, understand their supply chains, and be prepared to adapt their products and processes to meet increasingly stringent requirements.

The information provided in this guide serves as a crucial starting point for businesses to navigate these key changes and protect their brands in 2025 and beyond.

Stay informed. Stay compliant. Stay competitive.

Want to find out how to accelerate global compliance and unlock enterprise growth? [Start a conversation](#) today!



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