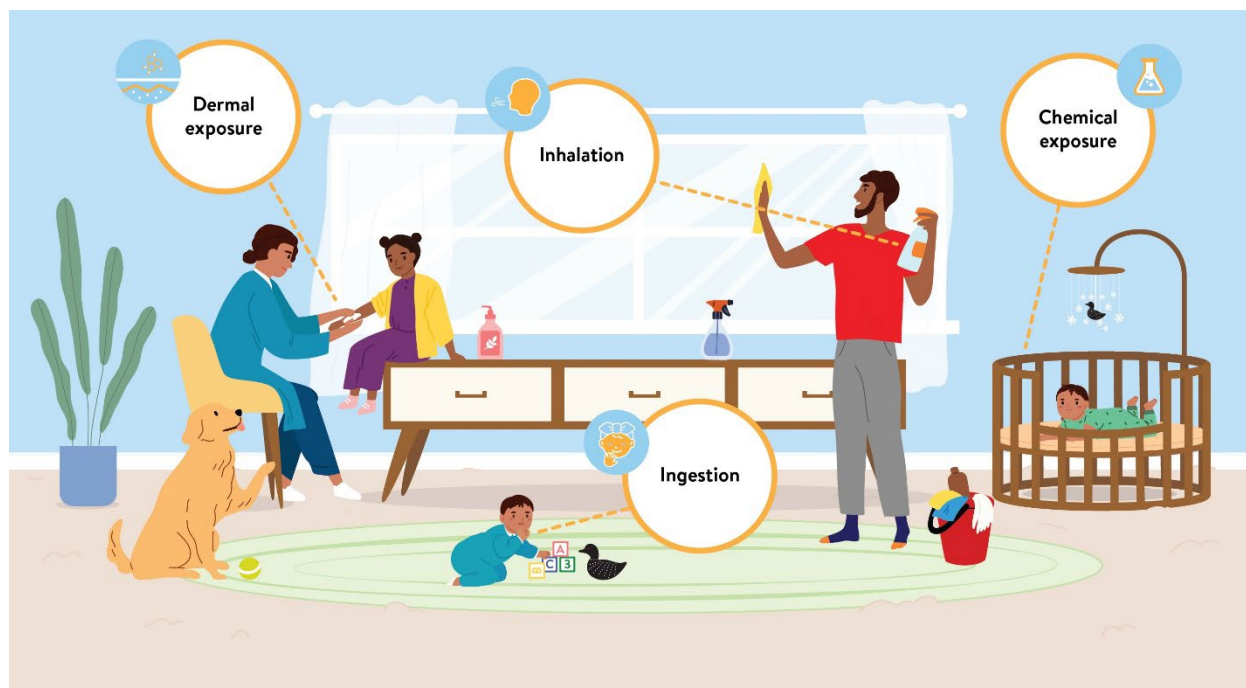


Minnesota Toxic Free Kids Program - 2025

CHEMICALS OF HIGH CONCERN LIST AND PROGRAM UPDATE



Minnesota Toxic Free Kids Program – 2025 Update

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Abbreviations and Acronyms

Abbreviations and Acronyms	Phrase or Organization Name
CAS RN	Chemical Abstract Service Registry Number
CHC	Chemicals of High Concern List
Commerce	Minnesota Department of Commerce
CPIT	Chemicals in Products Interagency Team
ECHA	European Chemicals Agency
EPA	United States Environmental Protection Agency
HPV	High Production Volume
IC2	Interstate Chemicals Clearinghouse
MDH	Minnesota Department of Health
MPCA	Minnesota Pollution Control Agency
PBT	Persistent, Bioaccumulative, and Toxic
PC	Priority Chemical List
SVHC	Substances of Very High Concern List; European Chemicals Agency
TFK	Toxic Free Kids
vPvB	Very Persistent and Very Bioaccumulative
VT CHCC	State of Vermont's Chemicals of High Concern to Children

Executive Summary

Through the Toxic Free Kids (TFK) program, the Minnesota Department of Health (MDH) is working to identify and communicate the potential for hazardous chemical exposures from consumer products that could be harmful to human health, particularly to children and other vulnerable or susceptible populations.

The TFK program began in 2009 after Minnesota passed legislation (Minnesota Statutes, sections 116.9401 to 116.9407) known as the Toxic Free Kids Act (Minnesota Statutes, 2024). The legislation directed MDH to create and maintain two chemical lists. The Chemicals of High Concern (CHC) list, the focus of this report, identifies hazardous chemicals in consumer products, particularly those intended for children. The Priority Chemicals (PC) list is a smaller subset of the CHC list with the added requirements of having a high production volume and being detected through biomonitoring or environmental monitoring.

The first few years of the TFK program focused on creating and maintaining these two lists. Since the last TFK program update report in 2022 (Minnesota Department of Health, 2022), the TFK program has increased its work on communication and education efforts not only with the public, but also with health care providers, state government, academia, and affected communities. While the statutory responsibility of maintaining the two chemical lists is still an important function of the TFK program, MDH recognized that more could be done to work with the communities and populations impacted by and concerned with hazardous chemicals in consumer products. This report provides an update to both the 2025 CHC list (required every three years) and to the areas of partnership and outreach that the TFK program has engaged in over the past three years.

The CHC list, is a chemical hazard-based list defined in Minnesota Statutes, section 116.9401, paragraph (e):

(e) “Chemical of high concern” means a chemical identified on the basis of credible scientific evidence by a state, federal, or international agency as being known or suspected with a high degree of probability to:

- (1) harm the normal development of a fetus or child or cause other developmental toxicity;
- (2) cause cancer, genetic damage, or reproductive harm;
- (3) disrupt the endocrine or hormone system;
- (4) damage the nervous system, immune system, or organs, or cause other systemic toxicity;
- (5) be persistent, bioaccumulative, and toxic; or
- (6) very persistent, and very bioaccumulative. (Minnesota Statutes, 2024).

MDH published the original CHC list in 2010 and reviews the list every three years. This report describes the fifth review and update of the CHC list.

MDH added to or removed chemicals from the 2025 CHC list after reviewing statutorily named authoritative sources and after reviewing any relevant toxicological studies. Authoritative

source reviews that resulted in additions to the 2025 CHC list were from the European Chemicals Agency's Substances of Very High Concern list as well as from the State of Vermont's *Chemicals of High Concern to Children* list. Chemicals removed from the 2025 CHC list were due to their use categories falling under the statutorily exempt categories of pharmaceuticals or chemicals used in agricultural production. The 2025 CHC list contains 1,559 chemicals, and this review added 15 chemicals while removing 200 chemicals. The 2025 list, including a breakdown of the chemicals added and those removed, can be found at [Chemicals of High Concern](#).

Since the last updated report in 2022, the TFK program has participated in numerous partnerships. MDH remains a member of the Interstate Chemicals Clearinghouse (IC2), a national association of state, local, and tribal governments that promotes a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products. MDH joined IC2 in 2009 after the passage of the Toxic Free Kids Act. In 2016, MDH helped establish, and continues to guide, the Chemicals in Products Interagency Team (CPIT) that works with other Minnesota state agencies to align work efforts relating to chemicals in consumer and commercial products. The most recent partnership for the TFK program was with Hamline University. The Hamline University partnership consisted of a community-based research project with students who created educational material for MDH's use. This partnership also resulted in a poster presentation at the joint 2025 annual meeting of the International Society of Exposure Science and the International Society for Environmental Epidemiology.

The TFK program has engaged in multiple education and outreach initiatives in the past few years. Among these initiatives is a relaunched quarterly digital newsletter and expansion into social media platforms, including Facebook, LinkedIn, and Instagram. To sign up for the digital newsletter, visit the [Announcements](#) webpage and select "Get email updates". Additional educational materials available on the TFK program webpage include chemical information sheets. The TFK program continues to develop and provide materials for a range of audiences in new and creative formats.

The updated 2025 CHC list, education and outreach materials, and this report are published on the TFK [Chemicals of High Concern](#) webpage. Future materials, updates, and revisions will also be published on the MDH website. To receive notifications of MDH activity related to the TFK program, you can sign up for e-mail notices at the above web link.

2025 Chemicals of High Concern Update

This report fulfills the Minnesota Department of Health's (MDH) statutory requirement to review and update the Chemicals of High Concern (CHC) list at least every three years. In addition, it describes the ongoing work of the Toxic Free Kids (TFK) program. MDH strives to make information about chemicals found in consumer products accessible and useful. To do this, the TFK program works to stay connected to Minnesota communities and to produce education and outreach materials that are relevant to their concerns.

This first section of the report describes the 2025 update to the CHC list. Later sections describe TFK program updates since 2022, focusing on partnerships and collaborations and status updates on the education/outreach work of the program.

Legislative Background

In 2009, Minnesota passed legislation related to concerns of hazardous chemicals being present in consumer products, especially products intended for children. This legislation, known as the Minnesota Toxic Free Kids Act, requires MDH, in consultation with the Minnesota Pollution Control Agency (MPCA), to create and maintain two chemical lists (Minnesota Statutes, 2024). The first list, called the Chemicals of High Concern (CHC) list, is a chemical hazard-based list defined in Minnesota Statutes, section 116.9401, paragraph (e):

(e) "Chemical of high concern" means a chemical identified on the basis of credible scientific evidence by a state, federal, or international agency as being known or suspected with a high degree of probability to:

- (1) harm the normal development of a fetus or child or cause other developmental toxicity;
- (2) cause cancer, genetic damage, or reproductive harm;
- (3) disrupt the endocrine or hormone system;
- (4) damage the nervous system, immune system, or organs, or cause other systemic toxicity;
- (5) be persistent, bioaccumulative, and toxic; or
- (6) very persistent, and very bioaccumulative.

Minnesota Statutes, section 116.9402, paragraphs (b) through (d) established a schedule for updating the CHC list, and named potential sources to be used when evaluating chemicals for possible inclusion on the CHC list:

(b) The department must periodically review and revise the list of chemicals of high concern at least every three years. The department may add chemicals to the list if the chemical meets one or more of the criteria in section 116.9401, paragraph (e).

(c) The department shall consider chemicals listed as a suspected carcinogen, reproductive or developmental toxicant, or as being persistent, bioaccumulative, and toxic, or very persistent and very bioaccumulative by a state, federal, or international agency. These agencies may include but are not limited to, the California Environmental

Protection Agency, the Washington Department of Ecology, the United States Department of Health, the United States Environmental Protection Agency, the United Nation's World Health Organization, and European Parliament Annex XIV concerning the Registration, Evaluation, Authorization, and Restriction of Chemicals.

(d) The department may consider chemicals listed by another state as harmful to human health or the environment for possible inclusion in the list of chemicals of high concern.

MDH published the first CHC list in July of 2010; that list and subsequent updates can be found on TFK [Reports](#) webpage. The second list is the Priority Chemicals (PC) list. This list is a smaller subset of the CHC list and includes additional requirements of high production volume and being detected through biomonitoring or environmental monitoring. This report does not discuss the PC list. To learn more about the PC list, visit [Priority Chemicals](#).

Previous Chemicals of High Concern Lists

Each update of the CHC lists has first involved the review of authoritative sources and chemical data for additions to and removals from the CHC list. The second part of each update has been a review of the high production volume (HPV) status of chemicals listed. This 2025 update to the CHC list followed the same process for the first step; however, MDH was unable to update the HPV status of chemicals listed in time for publication of this report, because new data from the United States Environmental Protection Agency (EPA) was not yet available. Once that EPA data does become available, MDH will update the HPV status of chemicals on the 2025 CHC list. For detailed information on the previous CHC list updates, visit TFK [Reports](#).

Chemicals Added and Removed

The 2025 update of Minnesota's CHC list resulted in the addition of 15 chemicals and the removal of 200 chemicals, reducing the total number of chemicals on the list from 1,744 in 2022 to 1,559 in 2025.

Methodology for the addition of chemicals to the CHC list

When reviewing chemicals for potential addition to the CHC list, MDH looked for chemicals identified as hazardous to human health by authoritative sources, including sources named in Minnesota Statutes section 116.9402 (referenced above).

MDH's review of the following authoritative lists resulted in chemicals being added to the 2025 CHC list:

- Registration, Evaluation, Authorisation, and Restriction of Chemicals, Substances of Very High Concern (SVHC) (European Chemicals Agency, 2025)
- State of Vermont Chemicals of High Concern to Children (Vermont Department of Health, 2025).

MDH reviewed chemicals newly listed since 2022 on the European Chemicals Agency's (ECHA) SVHC list and compared these chemicals to the 2022 CHC list. Chemicals found on this source list, but not found on the 2022 CHC list, were then further reviewed to identify commercial or consumer uses/applications. Minnesota Statutes, section 116.9405, names specific uses or applications that are exempt from being listed. If a chemical was exclusively used in an

exempted category or if no known uses could be determined, MDH did not add it to the 2025 CHC list.

Vermont is one of a handful of states that has passed legislation similar to Minnesota's Toxic Free Kids Act. For this reason, Vermont's list was compared to MDH's 2022 CHC list, and any chemicals found to be listed by Vermont, but not MDH, were then further checked for product uses and potential exemptions. This resulted in two chemicals being added from Vermont's Chemicals of High Concern to Children (VT CHCC) list to MDH's 2025 CHC list.

A detailed table of the 15 chemicals added to the 2025 CHC list — including their name, chemical abstract registry number (CAS RN), authoritative source, and health endpoint(s) — can be found at TFK [Chemicals of High Concern](#).

Methodology for the removal of chemicals from the CHC list

To determine which chemicals might be removed from the CHC list, MDH looked for chemicals that could be exempt due to their use/application categories as named in Minnesota Statute 116.9405.

This process resulted in the removal of 200 chemicals listed as pharmaceuticals or pesticides with no other known product uses or applications. Many of the pesticides removed from the CHC list are no longer used in the United States. For the remainder of chemicals listed as pesticides, if no consumer/residential use could be determined, they were removed from the CHC list. Chemicals found to have a pesticide use in consumer/residential applications were kept on the 2025 CHC list.

Removal of a chemical from the CHC list should not be interpreted as a determination of its safety. A detailed table of the chemicals removed from the 2025 CHC list — including their name, CAS RN, and reason for removal — can be found at TFK [Chemicals of High Concern](#).

Toxic Free Kids Program Update

Consumer Products and Health Equity

The mission of MDH is to protect, maintain, and improve the health of all Minnesotans and includes a vision for health equity, where all communities are thriving, and all people have what they need to be healthy. While Minnesota is often recognized as a healthy state, health outcomes and access to resources are not equitably distributed across communities. Some communities, — including people of color, American Indians, LGBTQ+ communities, people who have a disability, immigrants and refugees, and residents in rural areas — face barriers rooted in decades of systemic inequities.

Hazardous chemicals in consumer products present a greater risk of harm to some groups of people than others. The TFK program focuses on children and people who are or can become pregnant. Children are more sensitive to hazardous chemical exposures, because their bodies are still developing. Similarly, pregnant people experience bodily changes that can make them more vulnerable to risks of harm from chemical exposures. Additionally, some chemicals that a pregnant person is exposed to can potentially harm a developing fetus.

Some communities are more at risk of hazardous chemical exposure from consumer products, because some products are more commonly used in their culture than in others. For example, the TFK program has been working to address the issue of mercury added to skin-lightening products, which are predominately used by people of color. The TFK program developed new fact sheets for health care providers and the public and has conducted social media outreach campaigns on this topic. The TFK program is also part of an interstate agency team that discusses resources and information about mercury in personal care products. The TFK program hopes to continue working with all partners on this important issue.

The TFK program provides trainings to health workers, health care providers, local public health staff, and others who work with populations that are disproportionately impacted by exposure to potentially harmful chemicals. The program also develops education materials, distributes them at community fairs and other multicultural events and shares information broadly through social media. More information on outreach and trainings can be found in the section “Health Education and Outreach.”

Partnerships and Collaborations

Over the course of the last three years, the TFK program has developed partnerships and collaborations with governmental and non-governmental agencies. The purpose of these partnerships and collaborations is to advance the work and mission of MDH and the TFK program.

Chemicals in Products Interagency Team

In 2016, MDH, the Minnesota Pollution Control Agency (MPCA), and the Minnesota Department of Commerce (Commerce) formally established the Chemicals in Products Interagency Team (CPIT).

From article II of the CPIT charter, the goal of CPIT is:

“To reduce the amount of chemical hazards in products, their dispersion into Minnesota’s environment, and their presence in the bodies of Minnesota citizens, especially our most vulnerable communities” (Chemicals in Products Interagency Team, 2016).

The three agencies work in partnership to:

- Monitor chemical hazards in consumer and business-to-business products, humans, and the environment.
- Educate citizens, vulnerable communities, and businesses about chemical hazards and how to avoid them if they so choose.
- Accelerate the development and use of safer alternatives by businesses, state government, and Minnesotans, enhancing Minnesota business growth wherever possible.

Through CPIT, MDH and the other member agencies have been able to align their work efforts and leverage their respective authorities and resources on many issues and projects relating to chemicals in consumer and commercial products.

For example, through CPIT, MPCA has been purchasing children’s products and testing them for hazardous chemicals named in Minnesota chemical/product restriction laws. CPIT is also

continuing to refine and coordinate the enforcement process for covered products. Enforcement authorities typically fall under MPCA or Commerce with CPIT serving to coordinate any education / outreach needed because of product testing efforts. The TFK program assists with this communication effort. The table below details the items tested for lead and cadmium under Minnesota Statute 325E.3892 (passed in 2023). Results from the products tested are still pending.

Fiscal Year	Items tested
2023	<ul style="list-style-type: none"> 19 children’s products, including toys, jewelry, clothing and accessories, jewelry-making kits 8 were non-compliant with 2023 law
2024	<ul style="list-style-type: none"> 49 children’s products, including toys; jewelry; crayons, chalk and art supplies; jewelry-making kits; accessories; costumes 8 were non-compliant with 2023 law
2025	<ul style="list-style-type: none"> 49 children’s products, including toys, costumes, jewelry, accessories, school supplies, kids’ make-up, fidget spinners, games Results from the products tested are still pending.

Interstate Chemicals Clearinghouse (IC2)

The Interstate Chemicals Clearinghouse (IC2) is an association of state, local, and tribal governments that promotes a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products.

The goals of the IC2 are to:

- Avoid duplication and enhance efficiency and effectiveness of agency initiatives on chemicals through collaboration and coordination.
- Build governmental capacity to identify and promote safer chemicals and products.
- Ensure that agencies, businesses, and the public have ready access to high quality and authoritative chemical data, information, and assessment methods.

Members from the TFK program and CPIT participate in IC2 activities, including their Low-Income and Disadvantaged Communities Workgroup and their Database Workgroup.

Academic partnerships

In 2024, the TFK program partnered with a Hamline University public health seminar course to conduct focus group discussions on chemicals in products. Students in this course were able to get ‘hands on’ public health training and experience. They developed questions for focus group

discussions, conducted focus group interviews, and analyzed the data. They also obtained experience developing public health messaging and proposing a social marketing campaign. Students expressed satisfaction with the project and felt their learning could aid them in their future careers. This partnership also provided an opportunity for collaboration between state and academic institutions and resulted in a poster presentation at the joint annual meeting of the International Society of Exposure Science and the International Society for Environmental Epidemiology in 2025.

Health Education and Outreach

Community Needs Assessment

To better inform the program's education and outreach efforts, MDH conducted a community needs assessment in 2024 with 12 health providers and community leaders. The needs assessment was done to gain an understanding of community priorities, knowledge, and preferred methods of communication about toxic chemicals in children's products. Data from the assessment was used to identify and build better communication strategies and partnerships with clinics, local public health organizations, and community-based organizations. A report of the findings can be found on the TFK program website (MDH, 2024).

Community Outreach



Figure 1: Picture of banner at the 2025 Karen New Year



Figure 2: Nini Mentan (Minnesota Department of Health) and Michael Xiong (Minnesota Pollution Control Agency) tabling at the Karen New Year



Figure 3: The Toxic Free Kids Program table at the Washington County Health Fair

Based on findings from the community needs assessment, the TFK program expanded its trainings and outreach. From February 2024 to May 2025, the TFK program attended six community educational events and conducted 15 trainings. The table below provide details on the outreach efforts and attendance. The highest attendance for trainings was from the COVID-19 Community Connectors event that drew 70-90 attendees. The Karen New Year was the highest attended community educational event with 1,000 attendees.

From anecdotal conversations with community members, community-based organizations, and providers, there seemed to be a desire to learn more about toxic chemical exposures in consumer products. They highlighted the need to share educational materials with families and

have conversations on how to decrease exposure and prevent potential negative health outcomes.

Toxic Free Kids Program Trainings

Trainings	Approximate Attendance
COVID-19 Community Connectors meeting	90
Minnesota Head start Program training	10
Licensed St. Paul Public Schools, School Nurses	25
Outreach Connections	8
Hmong Early Childhood Coalition	10
Minnesota Collaborative Lead Education and Assessment Network (MCLEAN)	72
Dakota Child and Family Clinic	18
Hmong Health Care Professionals Coalition	13
Dakota County Community Health Workers	30
Ramsey County Women Infant and Children (WIC) Staff	25
Minnesota Community Health Worker Alliance	6
Mercury Exposure in Skin-lightening Products Health Care Providers (4 trainings)	82

Community Educational Events

Events	Approximate Attendance
Mercury exposure training at WellShare International	12
Mercury exposure training at Karen Organization of Minnesota	7
University of Minnesota-Twin Cities YMCA Health Fair (Fall)	20
University of Minnesota-Twin Cities YMCA Health Fair (Spring)	50
Karen New Year	1,000
WellShare International Women's group Toxic Free Kids program training	15

Digital Health Education

Social media

The TFK program has increased efforts to raise awareness of potentially toxic chemicals through social media, issuing twice-monthly social media posts. These posts were shared on X, Facebook, Instagram and LinkedIn. In 2024, the TFK program created social media posts for CPIT's initiative focused on lead and cadmium in children's products. Findings from the analytics indicate that social media is a good medium for reaching audiences of interest and engaging with them on this topic. A back-to-school campaign on how to reduce exposure to toxic chemicals generated interest on MDH's Facebook page, which has more than 112,000 followers. This initiative will be used to inform future efforts of engaging with our target audiences through social media platforms.

Digital newsletter

The TFK program relaunched its quarterly digital newsletter in 2023. The goal of the newsletter is to provide recipients with updates on the program and information about chemical exposures in consumer products. Through this newsletter, the program has been able to engage with key stakeholders and community members. As of 2019, there were around 2,500 subscribers. By the end of 2024, the number of subscribers had increased to more than 8,500.

Closing

The 2025 update of Minnesota's CHC list resulted in the addition of 15 chemicals and the removal of 200 chemicals, reducing the total number of chemicals on the list from 1,744 in 2022 to 1,559 in 2025.

The TFK program will continue to deliver education and outreach about chemicals in consumer products in a clear, concise, and appropriate manner. The program's efforts to reestablish partnerships after the COVID-19 pandemic, which forced the TFK program to substantially curtail activities, was a major accomplishment. The TFK program plans to continue to expand partnerships and collaborations to ensure that the relevant information reaches key audiences. The updated CHC list and educational materials can be found at Toxic Free Kids Program.

References

Chemicals in Products Interagency Team. (2016). Chemicals in Products Interagency Team Charter-Articles I to IX.

European Chemicals Agency. (2025). Candidate list of substances of very high concern for Authorisation. Retrieved from <https://echa.europa.eu/candidate-list-table>

Minnesota Department of Health. (2024). Toxic Free Kids Program Needs Assessment Report. <https://www.health.state.mn.us/communities/environment/childenvhealth/docs/tfkassessreport.pdf>

Minnesota Statutes. (2024). Toxic Free Kids Act. Sections 116.9401 to 116.9407. Retrieved from <https://www.revisor.mn.gov/statutes/?id=116.9401>

Vermont Department of Health. (2025). Chemicals of High Concern to Children. Retrieved from <https://www.healthvermont.gov/environment/childrens-environmental-health/chemical-disclosure-program-childrens-products>

Resources

Chemicals of High Concern

<https://www.health.state.mn.us/communities/environment/childenvhealth/tfka/highconcern.html>

Announcements

<https://www.health.state.mn.us/communities/environment/childenvhealth/tfka/announcements.html>

Reports

<https://www.health.state.mn.us/communities/environment/childenvhealth/tfka/reports.html>

Priority Chemicals

<https://www.health.state.mn.us/communities/environment/childenvhealth/tfka/priority.html>

Toxic Free Kids Program

<https://www.health.state.mn.us/communities/environment/childenvhealth/tfka/index.html>