Formaldehyde 101 Talking Points

- Formaldehyde is a naturally occurring substance that is an ever-present part of our world. All organic life forms plants, fish, animals and humans naturally produce formaldehyde. More than 90 percent formaldehyde is emitted from wildfires, vegetation, and soil, and these sources emit thousands of times more than the chemical sector.
- Formaldehyde is a critical building block used in the production of many applications
 critical to America's economy and national security, including sustainable wood products,
 medical devices, semiconductors, automobiles and electric vehicles, affordable homes,
 agricultural products, and food safety. There are no suitable alternatives for many of these
 uses.
- Over <u>40 years of scientific studies</u> by universities and independent scientists have been used by U.S. government agencies and international regulatory bodies to <u>demonstrate a safe level</u> <u>of formaldehyde exposure</u>.
- Any assessment of formaldehyde must begin with the best available science and the fact
 that formaldehyde is an ever-present part of the natural world and is essential to a wide range
 of products.
- EPA <u>relies on a flawed 2022 draft Integrated Risk Information System (IRIS) assessment on formaldehyde</u>, which has been widely criticized by the scientific community for its deficiencies and inadequate standards for scientific rigor and impartiality. IRIS has <u>never been authorized by Congress</u>.

Overly Restrictive EPA Regulations Threaten Critical Supply Chains

- On March 15, 2024, the U.S. Environmental Protection Agency (EPA) released a proposed risk evaluation on formaldehyde. EPA's assessment determines that virtually all uses of formaldehyde they looked at ((including manufacturing, processing, distribution, industrial, commercial, and commercial uses) constitute an "unreasonable risk" under the Toxic Substances Control Act (TSCA), which is likely to trigger bans or unachievable workplace standards.
- The EPA is proposing to set unachievable worker exposure limits for most manufacturing
 and commercial uses of formaldehyde that are below concentrations found in American
 homes, background levels in outdoor air, and right around the levels in our own breath.
- EPA's proposal is 30 times below Europe's recently updated worker exposure limit of 300 parts per billion using the latest science.

- If finalized as is, this regulation would <u>shut down U.S. facilities that manufacture</u>
 <u>formaldehyde and disrupt critical supply chains</u> for vital products including building and
 construction materials, medical devices, autos, agriculture, national defense, and
 semiconductors. Find <u>more information on the critical uses of formaldehyde</u>.
- EPA is seeking to <u>rush and limit the scope of a forthcoming peer review</u>, in <u>violation of TSCA</u>
 <u>standards</u> that EPA must act based on the best available science and the weight of scientific
 evidence.

How You Can Help

- We need to educate Members of Congress and their staff on the critical role formaldehyde plays in products we rely on. Ask for them to weigh in with the EPA and pursue a more sensible regulatory approach.
- Specific steps can include:
 - Write to EPA seeking a more reasonable timeline for public comment and peer review, or highlighting how EPA's draft risk evaluation could result in significant economic impacts and is not based on the best available science.
 - Support legislative solutions like the bipartisan <u>Sound Science For Farmers Act</u>, No Industrial Restrictions In Secret Act (No IRIS Act, introduced in the <u>House</u> and <u>Senate</u>), and provisions in must-pass appropriations (including FY24 House-passed <u>amendment</u> and <u>report language</u>), <u>defense</u>, and <u>Farm Bills</u>.
 - Write op-eds, letters to the editor, or blog posts highlighting EPA's unscientific approach.