Formaldehyde:
Setting the Record Straight

American® Chemistry Council

Formaldehyde is a critical building block of the U.S. chemical industry and an essential part of everyday life. Any assessment of formaldehyde must use transparent, science-based standards that consider the weight of scientific evidence, which consistently demonstrates that formaldehyde is safe at typical exposure levels.

The safety of our industry's products and addressing potential risks from exposure is important—and we take this responsibility seriously. Industry has invested tens of millions of dollars to promote the safe use of products using formaldehyde. **There are decades of scientific data that support a safe level of formaldehyde exposure at current regulatory limits.**

Formaldehyde supports employment for nearly **1 million workers** and generates **over half a trillion dollars** in sales in the United States.*

* 2018 data and 2018 data estimates from the U.S. Bureau of Labor Statistics and the U.S. Census Bureau

EPA is revisiting its draft Integrated Risk Information System (IRIS) assessment on formaldehyde, and the assessment will be reviewed by the National Academy of Sciences (NAS). But the EPA's IRIS program has been criticized for years for producing substandard reports, even by NAS. We are concerned that the EPA's forthcoming draft may not meet the standards of best available science, transparency, or objectivity—and that NAS will not independently review the assessment to evaluate if EPA appropriately addressed past NAS scientific recommendations.

Based on recent findings uncovered by ACC, these concerns are well founded. Our findings detail a troubling pattern of process irregularities, bias, and conflicts of interest that demonstrates a greater need for scrutiny of the program's process and the development of the formaldehyde assessment specifically. Among causes for concern found by ACC:

- Key officials organizing the National Academy of Sciences' (NAS) upcoming review appear to have violated basic standards regarding independence, bias, and balance in the peer review process. For example, the lead NAS staff officer was directly involved in developing the assessment under review while working at EPA.
- EPA is violating its own IRIS process and policies by ambiguously prioritizing this assessment in 2021 and failing to include critical steps, like a systematic review protocol for formaldehyde, to allow peer reviewers and the public to determine if EPA is appropriately evaluating the science.
- The draft formaldehyde IRIS assessment lacked a thorough, formal interagency review to ensure robust participation from all other relevant federal agencies, as well as the public.

We support a robust review of formaldehyde that objectively evaluates the best available science. This process should be fully transparent, ensure the development of the assessment and its review are objective, incorporate a balance of perspectives, and be free of any appearance of bias. Without a firm commitment and a process check to confirm this assessment meets those standards, the public may be left with concerns about the quality of the review and the integrity of the assessment.

A NATURALLY OCCURRING

Formaldehyde is a naturally occurring substance found within our bodies and all living things, including fruits, vegetables, and meats.

WELL-STUDIED

Formaldehyde is one of the most studied chemicals in use today, and more than 40 years of research and experience have taught us a lot about how to use it safely.

ESSENTIAL INGREDIENT

Formaldehyde is a critical building block that has widespread usage and applications in a variety of industries including:

- Automotive & Aerospace
- Building & Construction
- Health & Medicine

ACC is requesting EPA take immediate steps to ensure that the draft formaldehyde IRIS assessment isn't used as a risk communication tool, to guide regulations, or to set policy at any level of government until EPA corrects the process errors and produces a document that meets scientific standards worthy of public confidence.

Learn more at AmericanChemistry.com/TheRealStory