Congress of the United States
Washington, DC 20515

July 25, 2025

The Honorable Lee Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Zeldin,

We write to express serious concerns about the Environmental Protection Agency's (EPA) Integrated Risk Information System (IRIS) assessment of formaldehyde.[1] The assessment is scientifically flawed, lacks transparency, and fails to meet the standards of objectivity, rigor, and integrity required under Executive Order 14303, *"Restoring Gold Standard Science,"* issued on May 23, 2025.[2] We strongly urge the EPA to withdraw the IRIS assessment and make clear that it will not be used to support or justify regulatory decisions.

This Executive Order reaffirms the federal government's obligation to ensure that science used in decision-making is transparent, rigorous, reproducible, and impartial. It rejects the politicization of science and mandates a return to scientific integrity policies that ensure objective peer review and federal regulations that are grounded in the best available science and apply a clear weight of scientific evidence approach. This Executive Order is essential to restoring public trust in government science and regulatory decisions.

We are concerned that the IRIS assessment of formaldehyde, released after an opaque and protracted process, does not meet the requirements of the Executive Order. For example, it does not reflect the most current or robust peer-reviewed science. Several recent studies appear to have been disregarded or ignored.[3]

Numerous scientific experts, public health professionals, industry representatives, and federal stakeholders have identified serious shortcomings in the assessment's methodology, data interpretation, and lack of meaningful engagement with the broader scientific community. [4] In some cases, dissenting

[1] EPA IRIS Toxicological Review of Formaldehyde (Inhalation), August 2024, available at: IRIS Toxicological Review of Formaldehyde (Inhalation)

[2] Executive Order 14303, Restoring Gold Standard Science, May 23, 2025, available at: https://www.govinfo.gov/content/pkg/FR-2025-05-29/pdf/2025-09802.pdf

[3] *See* public comments that have identified over 100 publications relating to important scientific issues including sensory irritation, formaldehyde modeling, weight of evidence, dermal exposure, and systematic review methods that have all been excluded.

[4] *See* EPA Dockets that contain hundreds of public comments on the IRIS assessment and TSCA Risk Evaluation: EPA-HQ-ORD-2010-0396; EPA-HQ-OPPT-2018-0438; and EPA-HQ-OPPT-2023-0613. This includes comments from government agencies like the Department of Defense, Department of Agriculture, Agency for Toxic Substances and Disease Registry and the Small Business Administration that have raised concerns about the scientific shortcomings of the IRIS assessment.

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scientific viewpoints appear to have been entirely disregarded or excluded from consideration[5], undermining the Executive Order's science integrity policy of encouraging open scientific exchange, considering different viewpoints and alternative scientific opinions.

Despite these deficiencies, the EPA recently finalized its risk evaluation for formaldehyde under the Toxic Substances Control Act (TSCA), relying heavily on this flawed IRIS assessment. The risk evaluation concluded that nearly all occupational uses of formaldehyde present an "unreasonable risk," leading EPA to propose exposure limits that are far more stringent than those recently adopted by the European Union. This approach risks placing U.S. manufacturers at a competitive disadvantage globally, while imposing unnecessary burdens on domestic industries and workers, both of which stand in stark contrast to the stated goals of the Administration to make American manufacturing and industry more competitive in the global economy.

The risk evaluation has drawn strong criticism from scientific experts, stakeholders, other federal agencies, and multiple peer review bodies, including members of the EPA's own Science Advisory Committee on Chemicals, who have raised serious concerns about the agency's reliance on the IRIS assessment.[6]

Formaldehyde is a critical building block chemistry, widely used across multiple sectors of the economy. Products that are based on formaldehyde technologies play a vital role in maintaining the integrity of U.S. supply chains, supporting over 1.5 million jobs and $1.6 trillion in manufacturing shipments and other economic output in 2023 alone. Key industries that depend on formaldehyde include housing; building and construction; food and agriculture; aerospace; science and preservation; semiconductors; automotive; national security; medicine and medical technologies.

This TSCA regulation has far-reaching implications and must be supported by transparent, high-quality science that meets the standards laid out in Executive Order 14303. The current IRIS assessment of formaldehyde falls far short of that bar and, as such, is not fit for use in regulatory decision making.

We therefore urge EPA to:

1. Formally withdraw the current IRIS assessment of formaldehyde, and

2. Make it clear that it will not be used to support or justify any regulatory actions under TSCA or any other statutory authority, unless and until a revised assessment is developed that fully aligns with the scientific standards and principles articulated in Executive Order 14303.

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[5] *See* comments from SACC peer reviewer, Dr. Roger McLellan, Differing Scientific Opinion and Recommended Path Forward—EPA Scientific Advisory , Aug 12, 2024.

[6] *See* EPA dockets EPA-HQ-OPPT-2018-0438 and EPA-HQ-OPPT-2023-0613 for hundreds of public commenters raising concerns on the TSCA program's reliance on the IRIS assessment. This includes SACC peer reviewer comments that found reliance on the IRIS assessment inappropriate, noting "concerns were raised by some Committee members regarding studies selected by ORD IRIS for chronic non-cancer hazards. These studies are mainly observational and unreliable for identifying a point of departure," and that they "do not adequately address the chosen endpoint." It also stated: "Many Committee members recommended not using the IUR published in the 2022 Draft Formaldehyde IRIS assessment." Also see comments from a bipartisan group of Members of Congress, 20 State Attorneys Generals, the National Association of State Departments of Agriculture and the California Department of Food and Agriculture urging EPA to use the best available science.

Thank you for your attention to this matter. We look forward to your prompt response and to continued engagement in ensuring that federal regulatory science is held to the highest standards of integrity and credibility.

Sincerely,

Pete Sessions
Member of Congress

Jack Bergman
Member of Congress

Glenn Grothman
Member of Congress

David Rouzer
Member of Congress

Brad Finstad
Member of Congress