

May 24, 2022

Dr. Wayne Cascio, Director  
Center for Public Health & Environmental Assessment  
U.S. Environmental Protection Agency  
EPA Docket Center (ORD Docket)  
Mail Code: 28221T, 1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Re: Availability of the Draft IRIS Toxicological Review of Formaldehyde (Inhalation)  
[EPA-HQ-ORD-2010-0396]**

Dear Sir or Madam:

On behalf of the leading national trade associations below representing the poultry, swine and animal feed industries, we respectfully request a 90-day extension of the comment period to meaningfully respond to the agency's Draft IRIS Toxicological Review of Formaldehyde (Docket #: EPA-ORD-HQ-2010-0396).

The agency has heard from the American Veterinary Medical Association and others regarding the important uses of formaldehyde in animal agriculture. It is utilized as an essential tool for pathogen control in animal feed production as well as sterilization and disinfection in egg hatcheries. Formaldehyde also plays a critical role in disinfection for live production operations on poultry and turkey farms. Moreover, research has demonstrated that formaldehyde can be used to inactivate highly contagious viruses, such as African swine fever (ASF). Recent estimates indicate that an ASF event in the U.S. could result in an economic loss of nearly \$50 billion and would be catastrophic to the nation's swine industry.

In our initial review of EPA's formaldehyde assessment, we note that there is no descriptive reference or acknowledgement of the presence, use, benefit or possible hazards associated with formaldehyde applications in the animal agriculture sector. It is also our understanding that neither USDA nor FDA have provided comment to EPA on the draft assessment, and we are uncertain if a pre-publication version of the assessment was shared with either agency.

Our request for a 90-day extension of the comment period would provide our industries additional time to properly review the draft, evaluate the nature and scale of the potential impacts of the assessment on the U.S. animal agriculture sector and the nation's food safety, and meaningfully respond to the agency.

We appreciate the opportunity for the industries below to comment. If you have questions regarding any of these topics, please contact Paul Bredwell at [pbredwell@uspoultry.org](mailto:pbredwell@uspoultry.org).

Regards,

American Feed Industry Association  
National Chicken Council  
National Pork Producers Council  
National Turkey Federation  
United Egg Producers  
U.S. Poultry & Egg Association