



May 15, 2022

U.S. Environmental Protection Agency  
EPA Docket Center (ORD Docket)  
Mail Code: 28221T, 1200 Pennsylvania Avenue NW  
Washington, DC 20460

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

Dear Sir or Madam:

The AVMA looks forward to the opportunity to provide comments in response to the Availability of the Draft IRIS Toxicological Review of Formaldehyde (Inhalation), Docket [EPA-HQ-ORD-2010-0396](#).

We respectfully request an extension of the comment period **until September 19, 2022**, to allow us to conduct a prudent review. We are asking for this 90-day extension to allow us to carefully consider potential adverse effects on animal health and welfare, public health, and food safety that may occur if formaldehyde manufacturers reduce, or perhaps even cease, formaldehyde availability.

Formaldehyde has multiple uses across the animal industries. It is widely used, of course, in histopathologic laboratories for specimen preservation, and is sometimes used as a disinfectant and sterilant in veterinary clinics and other animal facilities. Formaldehyde is also used as a food additive in the manufacture of animal feeds to improve handling characteristics and to maintain complete animal feeds or feed ingredients negative for *Salmonella* for up to 21 days ([21 CFR Section 573.460](#)), and may be an intermediate in the manufacture of formic acid, which is used as a preservative in hay crop silage and as a feed acidifying agent in complete feed for swine and poultry ([21 CFR Section 573.480](#)).

We note several federal agencies have commented on the Draft IRIS Toxicological Review of Formaldehyde (Inhalation), but we did not see comment from FDA or USDA, both of which have familiarity with the animal health, public health, and food safety uses of formaldehyde.

We thank the EPA for the opportunity to comment. If you have questions regarding the AVMA's request, please contact Dr. Mike Murphy at [mmurphy@avma.org](mailto:mmurphy@avma.org).

Sincerely,

Janet D. Donlin, DVM, CAE  
Executive Vice President and CEO

*The AVMA, founded in 1863, is one of the oldest and largest veterinary medical organizations in the world, with more than 99,500 member veterinarians worldwide engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine.*