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IOWA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

Docket ID: EPA-HQ-OPPT-2018-0438  
[www.regulations.gov/docket/EPA-HQ-OPPT-2018-0438](http://www.regulations.gov/docket/EPA-HQ-OPPT-2018-0438)

January 30, 2026

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

Re: Appreciation for EPA's Commitment to Gold Standard Science in  
the Formaldehyde Toxic Substances Control Act Risk Evaluation

Administrator Zeldin:

Formaldehyde plays a vital role in both industry and in [agriculture](#). For example, formaldehyde plays a crucial role in [egg production](#)—and American egg production is soaring due to President Trump's targeted policies. Formaldehyde also plays a vital role in construction and industry—and making sure that formaldehyde is produced here in America rather than in China is a key strategic effort. And of course people and animals produce formaldehyde just by [breathing](#). President Biden's decision to in effect ban domestic formaldehyde risked higher prices for food, for housing, for industry—and risked pushing jobs abroad.

We commend the Environmental Protection Agency for reaffirming its commitment to the use of the best available science and for aligning its analysis with the principles articulated in the Executive Order 14303, Restoring Gold Standard Science. The undersigned Attorneys General write to express our appreciation for the Agency's recent efforts to

reconsider key scientific assumptions underpinning the Toxic Substances Control Act risk evaluation for formaldehyde.

We appreciate EPA's willingness to carefully consider the extensive peer review record and substantive comments provided by scientific experts. The Agency's reconsideration of prior hazard assumptions, its increased reliance on controlled human exposure data, and its integration of mode of action evidence reflect a thoughtful and scientifically rigorous approach consistent with the Toxic Substances Control Act's requirements. This responsiveness to peer reviewer input strengthens confidence in the scientific integrity of the Agency's work and promotes durable, evidence-based regulatory outcomes.

We also recognize and support EPA's efforts to ensure that its approach is consistent with authoritative international scientific bodies and regulatory frameworks. President Biden's overly strict rules threatened to make the United States an outlier by limiting formaldehyde exposure in certain circumstances to levels [lower than what is found naturally](#). The Agency's evolving analysis aligns more closely with occupational exposure limits and scientific conclusions adopted by the European Union, the World Health Organization, and Health Canada. That alignment is critical not only for scientific credibility, but also for ensuring that the United States remains competitive within the global marketplace while maintaining robust protections for human health.

Formaldehyde is a [foundational chemistry](#) that supports critical sectors of the U.S. economy, including agriculture, manufacturing, health care, and infrastructure. Regulatory decisions grounded in sound science are essential to preserving access to these important uses while continuing to protect workers, consumers, and the environment. EPA's renewed emphasis on best available science, transparency, and peer-reviewed evidence represents an important step toward achieving that balance.

We appreciate the Agency's continued engagement with states and stakeholders as it works to finalize the formaldehyde risk evaluation. We stand ready to support science-based policies that protect public health,

promote regulatory certainty, and strengthen the nation's economic competitiveness.

Respectfully submitted,



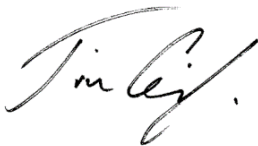
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Tim Griffin  
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Kris Kobach  
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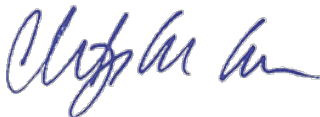
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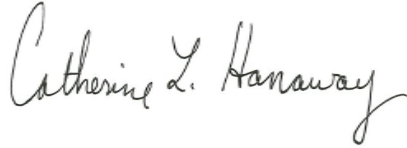
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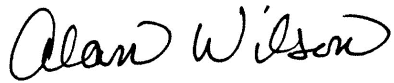
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