

April 26, 2007

**Statement of
Betsy M. Natz
Executive Director
The Formaldehyde Council
Before the
California Air Resources Board
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Good morning [afternoon]. My name is Betsy Natz and I am here today as the Executive Director of the Formaldehyde Council, a non-profit association that represents the leading producers and users of formaldehyde in the United States. Our organization is focused on the relationship between formaldehyde and the public health and assuring that the utilization of formaldehyde and the public policies governing its use are based on sound science. I thank you for this opportunity to provide our perspective.

The members of the Formaldehyde Council are concerned that with this proposed formaldehyde rule, CARB is embarking down a path that is completely out of sync with the most current and best available science on formaldehyde's potential human health effects. Today you will be hearing from experts who will point out the flaws in both the analysis and the drafting of this proposed rule. Simply put, we believe that this proposed rule to reduce formaldehyde in wood products is not based on the best available science and health data and will not provide appreciable health protection for the people of California.

Formaldehyde is a naturally occurring chemical that is found in abundance in the atmosphere and is produced by the human body, among other sources. The chemistry of formaldehyde makes it an extremely versatile ingredient in hundreds of items that improve everyday life. While little or no formaldehyde is present in most final products, the chemical is an essential component in making common consumer goods including medicines, vaccines, furniture, cabinets, insulation and other building products, as well as shampoo, deodorant, toothpaste and much more. Formaldehyde's wide-ranging use makes it essential to the operations of nearly 50,000 U.S. facilities in 17 major industries, and it serves as a basic raw material in another 70 industries.

The preponderance of existing human health research data demonstrates that the risk of cancer associated with relevant formaldehyde exposure levels is virtually nil. We feel strongly that additional research being conducted by government and industry will serve to further clarify the level of understanding pertaining to the safety of formaldehyde for consumers and industry workers.

The Formaldehyde Council urges CARB to consider all the relevant data on this important matter, rather than rush to bad judgment in this case. There is no credible evidence that formaldehyde, at common levels of exposure, constitutes a significant health risk.

Nevertheless, the proposed CARB Rule would throw out products made with formaldehyde and necessitate the substitution with chemical products whose impact on human health is generally unknown. In essence, this Rule would substitute a huge question mark for the negligible health risk associated with formaldehyde.

As detailed in FCI's written comments submitted previously, we strongly urge the Board to direct the Air Resources Board staff to make extensive revisions to the ISOR so that it is consistent with current science and current risk assessment practices.

Thank you.