

October 9th, 2024

The Honorable Joseph R. Biden
President
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear President Biden:

The undersigned organizations, representing all aspects of our nation's agriculture economy, urge your Administration to protect the continued production and use of urea and enhanced efficiency fertilizers (EEFs) as the Environmental Protection Agency (EPA) finalizes its risk evaluation of formaldehyde.

Agriculture plays a fundamental role in the livelihoods of countless rural communities across the country, and fertilizers are crucial to achieving successful harvests, feeding our nation and US trading partners around the world. Urea is a key nitrogen fertilizer, representing more than 25 percent of all nitrogen fertilizer use annually and is the most widely used form of nitrogen globally. Innovative EEF products like slow-release urea and urea-triazone liquid slow-release fertilizer are conservation tools that are increasingly used by farmers as a key part of efforts to reduce agriculture-based emissions.

Formaldehyde is essential to manufacture granular and slow-release urea products. Further, there are no established alternatives for formaldehyde reactants in the manufacturing of these products. If EPA's proposed unreasonable risk determinations are adopted, then the continued domestic production of urea, slow-release urea and urea-triazone liquid slow-release fertilizer would likely be halted either due to an outright ban on use of formaldehyde or via unachievable workplace standards.

All of us support meaningful workplace protections, but those decisions need to be grounded in sound science. In the case of formaldehyde, members of EPA's scientific review panel expressed grievances about the lack of time provided for peer review, and in a letter to Administrator Regan one SACC member requested a reconvening of the panel to review a revised risk evaluation to ensure key science issues are adequately addressed. Utilizing the same data from the same studies as regulators around the world, EPA has reached a wildly different draft occupational exposure value (OEV). EPA's OEV of 11 parts per billion (ppb) stands in stark contrast to the European Union's recently revised OEV of 300 ppb. EPA has proposed values that fall well below both global standards and the typical background levels of formaldehyde measured in ambient urban air and U.S. residences.

Setting standards based on an OEV of 11 ppb would have broad and deep impacts across agriculture. Fertilizer manufacturers would need to shut down or overhaul certain production activities. Agronomists and others would have fewer choices available to help farmers maximize yields while utilizing sustainable practices on the farm. Farmers of all sizes would feel the economic impacts of lower yields and reduced opportunities to support the growing production of clean transportation fuels. All of this will hurt the family-sustaining jobs that are critical to rural communities, threaten the U.S.' ability to support global food security, and result in further increases to food prices, which would be felt at the kitchen tables of American families all across the country.

We encourage your Administration to take the steps necessary to address the scientific deficiencies in EPA's current formaldehyde risk evaluation. We urge the adoption of occupational exposure values that align with international standards and protect the continued production and use of urea and EEF products like slow-release urea and urea-triazone liquid slow-release fertilizer, ensuring that farmers do not lose access to a quarter of domestic nitrogen fertilizers or innovative EEF products that are a tool for reducing emissions.

Thank you for your attention on this important matter.

Sincerely,

American Farm Bureau Federation

American Soybean Association

AmericanHort

Far West Agribusiness Association

Lawn Horticultural Products Work Group

National Association of Landscape Professionals

National Association of State Departments of Agriculture

National Council of Farmer Cooperatives

Ohio AgriBusiness Association

The Fertilizer Institute

USA Rice

Virginia Agribusiness Council

Cc: Tom Vilsack, United States Secretary of Agriculture, USDA

Michael Regan, Administrator, EPA