April 25, 2007

Robert Sawyer, Chair, CARB
Members of the Air Resources Board
1001 "I" Street
Sacramento, CA 95814



Dear Mr. Sawyer and Members of the Board:

The American Cancer Society, California Division is pleased to write in support of the California Air Resources Board's proposed Airborne Toxic Control Measure (ATCM) to reduce formaldehyde emissions from composite wood products.

While cancer incidence rates in California have declined since 1988, about 133,225 Californians will be diagnosed with having cancer this year and about 54,300 Californians will die of the disease. Through its research, education, advocacy, and patient and survivor services, the American Cancer Society is working to reduce cancer incidence and mortality and to improve the quality of life for all cancer survivors. Consistent with its cancer-fighting mission, the Society also supports taking the necessary steps to address environmental factors that impact cancer risk.

With regard to formaldehyde, we note that IARC, the International Agency for Research on Cancer, classifies formaldehyde as a known human carcinogen based on sufficient evidence in humans and sufficient evidence in experimental animals. An IARC Working Group also concluded that there is "strong but not sufficient evidence for a causal relationship between leukemia and occupational exposure to formaldehyde." Although the absolute cancer risk level due to formaldehyde exposure is low, occupational exposure has been linked to a cancer excess.

The Society believes that reducing exposure to formaldehyde is desirable and that reduced emissions will benefit public health. We support the proposed formaldehyde ATCM, and commend the Board for its actions to protect the health of all Californians.

Sincerely,

James K. Knox

Vice President, Legislative Advocacy

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