

**Comments on  
Proposed HHS Recommendation for  
Fluoride Concentration in Drinking Water  
for Prevention of Dental Caries**

Prepared for the  
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International Academy of Oral Medicine and Toxicology (IAOMT)  
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These comments on the proposed HHS recommendation for fluoride concentration in drinking water are submitted to the Department of Health and Human Services (HHS) in response to their January 13, 2011, request for public comments (Federal Register 2011). These comments are not to be considered a comprehensive review of fluoride exposure or toxicity.

The author of these comments is a professional in the field of risk analysis, including exposure assessment, toxicity evaluation, and risk assessment. She has recently served on two subcommittees of the National Research Council's Committee on Toxicology that dealt with fluoride exposure and toxicity, including the NRC's Committee on Fluoride in Drinking Water. She has also authored an Environmental Protection Agency report on fluoride toxicity.

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**Summary.** The Department of Health and Human Services (HHS) has proposed a new recommendation regarding fluoride concentrations in drinking water (Federal Register 2011), the primary change being from a recommended range of 0.7-1.2 mg/L fluoride in drinking water (0.7-1.2 ppm) based on ambient local temperatures, to a single value of 0.7 mg/L (0.7 ppm), regardless of temperature. The main concern is the prevention of dental fluorosis, a condition ranging from mild spotting of the teeth to severe pitting and staining. Dental fluorosis is caused by excessive fluoride ingestion during the early years of childhood, before the permanent teeth erupt. The HHS recommendation is intended to limit the risk of dental fluorosis while maintaining caries protection (Federal Register 2011), something that was suggested earlier by Heller et al. (1997), based on an analysis of a national survey of children conducted in 1986-1987.

The HHS is to be commended for recommending a reduced concentration of fluoride in drinking water. However, several important concerns remain:

- (1) The proposed reduction in fluoride concentration in drinking water is insufficient to achieve the HHS goal of a significant reduction in the nationwide prevalence of dental fluorosis.
- (2) The HHS recommendation does not address a number of other health concerns for the American population with respect to fluoride exposures.
- (3) Available data do not support a role of community water fluoridation in improving dental health.
- (4) HHS remains in the precarious position of recommending indiscriminate administration of a drug to the American population, without individual evaluation of need, appropriate dose, efficacy, or side effects.

These concerns are discussed in more detail below. If HHS is serious about limiting the risk of dental fluorosis and protecting the health of the American population, HHS should revise its proposed recommendation to call for an immediate end to community water fluoridation.

**(1) The proposed reduction in fluoride concentration in drinking water is insufficient to achieve the HHS goal of a significant reduction in the nationwide prevalence of dental fluorosis.**

The previous range of recommended fluoride concentrations was based on ambient temperature and the assumption that people's water consumption varies with outdoor temperature. Thus the recommended fluoride levels vary from 0.7 mg/L in Florida and parts of Arizona and Texas to 1.2 mg/L in Alaska, Maine, Michigan, Minnesota, and North Dakota. The new HHS recommendation will therefore have a larger effect on the northern states than on the southern states, with some areas seeing no change in the recommended fluoride concentration. The proposed change will also put the U.S. in agreement with Canada, which in 2009 recommended a fluoride concentration of 0.7 mg/L for all parts of the country (Health Canada 2009). However, the HHS has offered no data by state or region to show that the northern states have the highest prevalence of dental fluorosis or that reducing the fluoride concentration in northern states will bring the national prevalence of dental fluorosis down to an "acceptable" level. In addition, the Centers for Disease Control and Prevention (CDC) has reported that the black population in the U.S. has higher rates of dental fluorosis, including higher rates of moderate and severe dental fluorosis (CDC 2005). Since the black population is greatest in the southern states, reducing the fluoride concentration in the northern states but not the southern states cannot be expected to produce a significant reduction in dental fluorosis in the black population as a whole.

The 1986-1987 survey data mentioned by HHS (Federal Register 2011) show a clear dose response for fluorosis prevalence and severity with fluoride concentration (Heller et al. 1997; Table 1; Fig. 1). Unfortunately, the more recent 1999-2004 survey did not include water fluoride concentrations. The increase in total fluorosis prevalence (40.7% in 1999-2004 vs. 22.6% in 1986-1987 for children ages 12-15; Beltrán-Aguilar et al. 2010) probably represents both a higher fraction of the population receiving fluoridated water and higher total fluoride exposures for a given water fluoride concentration. Although increased fluoride intake from other sources such as toothpaste could be contributing to higher total fluoride exposures, a simple decrease in milk consumption with higher consequent intake of water and water-based beverages would also contribute to higher fluoride intake for a given water fluoride concentration.

Reducing fluoride concentrations in fluoridated community water will, at best, bring down fluorosis prevalence for that group only to the level experienced by the part of the group with water fluoride already at 0.7 mg/L. For example, based on the 1986-1987 data as reported by Heller et al. (1997), reducing fluoride concentrations in fluoridated community water would bring the fluorosis prevalence for that group down from about 30% (for the 0.7-1.2 mg/L group; Fig. 1) to about 27% (for 0.7 mg/L; see Fig. 2 of the Heller et al. paper), a relatively small decrease. However, elimination of fluoridation entirely, for the whole population, would be expected to bring the fluorosis prevalence down to that of the low-fluoride population (e.g., for the 1986-1987 cohort, from 30% to around 13%; Fig. 1), a much more substantial decrease.

HHS bases its recommendation partly on observations that water consumption among children does not depend greatly on ambient temperature (Federal Register 2011). The National Research Council (NRC 2006) also indicated that for much of the U.S. population, water consumption does not depend on outdoor temperature. However, the NRC also identified a number of population subgroups that have high water consumption, including people with high activity levels (more of a concern for older children and adults) and people with medical conditions such

as diabetes insipidus and diabetes mellitus (applicable to all ages). People in hot areas who are unable to afford air conditioning would be another subgroup of concern (applicable to all ages). Perhaps the most important population subgroup is composed of infants fed formula prepared with tap water. A substantial number of infants have water consumption rates in excess of 0.1 L/kg/day (100 mL per kg body weight per day; NRC 2006; EPA 2004a). At the proposed fluoride concentration of 0.7 mg/L in drinking water, these infants would still have fluoride intakes at and above 0.07 mg/kg/day, and some will exceed 0.15 mg/kg/day (NRC 2006). The only U.S. study to have looked at dental fluorosis and individual fluoride intake at various ages (the Iowa study) reported that for children with fluoride intakes above 0.06 mg/kg/day during the first 3 years of life, fluorosis rates were as high as 50% (Hong et al. 2006b). Eight individuals in the cohort were considered to have severe fluorosis (Hong et al. 2006b); their individual intakes were not reported, so one must assume that they did not necessarily have the highest intakes of the cohort. Thus a large fraction of infants and young children fed formula made with fluoridated tap water can be expected to develop dental fluorosis even at a water fluoride concentration of 0.7 mg/L.

The National Research Council considers severe dental fluorosis to be an adverse health effect and reports the general consensus in the literature that both severe and moderate dental fluorosis should be prevented (NRC 2006). Health Canada (2009) considers moderate dental fluorosis to be an adverse effect. The Iowa study indicates that high fluoride intake during the first 2 years of life is most important with respect to development of dental fluorosis of the permanent maxillary central incisors (the "top front teeth")—the teeth that most affect a person's appearance—although fluoride intake up to at least 4 years old was also important (Hong et al. 2006a). The American Dental Association has issued a brief statement to the effect that parents should not prepare infant formula with fluoridated water if they are concerned about the possibility of their child developing dental fluorosis (ADA 2007). This is an admission that dental fluorosis is undesirable, and that fluoridated tap water is not "safe" for all individuals. The CDC (2005) reports a higher likelihood of moderate and severe fluorosis for minority and low-income children. HHS should remember that while encouraging breastfeeding of infants is certainly appropriate, in many family situations breastfeeding is not possible (e.g., in cases of adoption or of ill-health or death of the mother). Especially since most assistance programs for low-income families do not cover the cost of bottled water or ready-to-feed formula, it is essential that tap water be safe for use in infant formula, without putting infants at increased risk of dental fluorosis.

In summary, the change in recommended water fluoride concentration proposed by HHS, while definitely a step in the right direction, is unlikely to bring about a substantial change in the prevalence of dental fluorosis in the U.S. In particular, infants and young children fed formula made with fluoridated tap water can still be expected to have high rates of dental fluorosis in their permanent teeth. Children with diabetes insipidus or diabetes mellitus and children in hot areas whose homes are not air conditioned can also be expected to have a substantial risk of developing dental fluorosis. To bring about a significant decrease in the prevalence and severity of dental fluorosis, HHS should recommend elimination of community water fluoridation throughout the entire U.S.

**(2) The HHS recommendation does not address a number of other health concerns for the American population with respect to fluoride exposures.**

The HHS recommendation addresses only dental fluorosis, while ignoring a long list of other health concerns for the U.S. population. Dental fluorosis itself has been associated with increased risks of various adverse health effects, including thyroid disease, lowered IQ, and bone fracture (Alarcón-Herrera et al. 2001; Zhao et al. 1996; Li et al. 1995; Lin et al. 1991; Desai et al. 1993; Yang et al. 1994; Jooste et al. 1999; Susheela et al. 2005). To the best of my knowledge, no studies in the U.S. or Canada have looked for associations between dental fluorosis and risk of other adverse effects. However, the failure to look for adverse health effects does not demonstrate the absence of adverse health effects.

The National Research Council (2006) indicated that the Environmental Protection Agency's (EPA's) present drinking water standards for fluoride (maximum contaminant level goal [MCLG] and maximum contaminant level [MCL], both at 4 mg/L) are not protective of human health, based on preventing severe dental fluorosis, stage II skeletal fluorosis, and increased risk of bone fractures. Given the wide range of water intake within the American population and the presence of other sources of fluoride intake, one can reasonably expect that a "safe" level of fluoride in drinking water would be at least a factor of 10 below the "unsafe" level of 4 mg/L. EPA's MCLG is defined as a "non-enforceable health goal which is set at a level at which no known or anticipated adverse effect on the health of persons occurs and which allows an adequate margin of safety" (EPA 2006). Dental fluorosis, skeletal fluorosis, and increased risk of bone fracture are all reasonably well known and acknowledged adverse health effects from fluoride exposure. However, EPA is also required to consider the "anticipated" adverse effects (which may occur at lower levels of fluoride exposure than the "known" effects) and allow for an adequate margin of safety. HHS should insist that EPA properly consider all of the anticipated adverse health effects, with an adequate margin of safety. The proposed HHS recommendation for water fluoridation at 0.7 mg/L is not adequate to protect against known or anticipated adverse effects and does not allow an adequate margin of safety to protect young children, people with high water consumption, people with kidney disease (resulting in reduced excretion of fluoride), and other potentially sensitive population subgroups.

In addition to the "known" adverse health effects of dental fluorosis, skeletal fluorosis, and increased risk of bone fracture, "anticipated" adverse health effects from fluoride exposure or community water fluoridation include (but are not limited to) carcinogenicity, genotoxicity, endocrine effects, increased blood lead levels, and hypersensitivity (reduced tolerance) to fluoride. These effects (described in more detail below) are not as well studied as the dental and skeletal effects, which should indicate that a greater margin of safety is necessary to ensure protection of the population—"in the face of uncertain evidence it is important to act in a manner that protects public health" (Tickner and Coffin 2006). In addition, it should be noted that some of these effects may occur at lower fluoride exposures than those typically associated with dental or skeletal effects, such that protection against the dental or skeletal effects does not necessarily ensure protection against other anticipated adverse health effects. Again, elimination of community water fluoridation is the best way to reduce fluoride exposures to a level at which adverse health effects are unlikely.

A few comments regarding the interpretation of the available fluoride studies may be helpful. As Cheng et al. (2007) have described, a "negative" study may simply mean that the study was not

sufficiently sensitive to demonstrate a moderate (as opposed to large) effect. This is often due to use of too small a sample size. In addition, study populations are often grouped by community, water source, or fluoride concentration in the water, rather than by individual intake. Due to the wide variation in drinking water intake, this approach results in study groups with overlapping intakes and makes it difficult to detect dose response relationships that do in fact exist.

The few studies that have looked at age-dependent exposure to fluoride have found increased risks of adverse effects (e.g., Bassin et al. 2006 for osteosarcoma; Danielson et al. 1992 for hip fracture risk); studies that have not looked at age-dependent exposure cannot be assumed to provide evidence of no effect. Similarly, studies that have used a measure of current exposure where a cumulative measure would be more appropriate, or vice versa, cannot be assumed to demonstrate lack of an effect.

Studies of fluoride toxicity in laboratory animals are sometimes dismissed as irrelevant because the exposures or fluoride concentrations used were higher than those expected for humans drinking fluoridated tap water. It is important to know that animals require much higher exposures (5-20 times higher, or more; see NRC 2006; 2009) than humans to achieve the same effects or similar fluoride concentrations in bone or serum. In other words, humans are considerably more sensitive to fluoride than are most animal species that have been studied.

A number of adverse health effects can be expected to occur in at least some individuals when estimated average intakes of fluoride are around 0.05 mg/kg/day or higher (NRC 2006; 2009). For persons with iodine deficiency, average intakes as low as 0.01-0.03 mg/kg/day could produce effects (NRC 2006). The next few sections briefly summarize some (not all) of the adverse health effects, known and anticipated, that should be considered in any reevaluation of the drinking water standards for fluoride. Most of these effects have been reviewed in detail by the NRC (2006), although the NRC did not specifically evaluate health risks over the whole range of fluoride intakes or attempt to identify a "safe" level of fluoride exposure.

### *Skeletal fluorosis*

Bone fluoride concentrations in the ranges reported for stage II and III skeletal fluorosis will be reached by long-term fluoride exposures of 0.05 mg/kg/day or higher (estimated from NRC 2006). Bone fluoride concentrations, radiologic changes, and symptoms are not clearly correlated (Franke et al. 1975), and most U.S. studies do not categorize cases by stage. Recent case reports include fluorosis attributed to excessive ingestion of tea or toothpaste (Whyte et al. 2005; Hallanger Johnson et al. 2007; Kurland et al. 2007). Most of the literature addresses high fluoride exposures over a few years; there has been essentially no investigation of effects of low exposures over many years and no effort to identify fluorosis of any stage in the U.S. "Arthritis" (defined as painful inflammation and stiffness of the joints) is the leading cause of disability in the U.S., currently affects at least 46 million adults in the U.S. (including 50% of the population > 65 years old), and is expected to affect 67 million adults in the U.S. by 2030 (CDC 2006). The possibility that a sizeable fraction of "bone and joint pain" or "arthritis" in U.S. adults is attributable to fluoride exposure has not been addressed, although it is plausible, given what is known about fluoride intakes.

### *Increased risk of bone fractures*

The NRC (2006) concluded that lifetime exposure to fluoride at an estimated average daily intake of 0.08 mg/kg/day (average adult fluoride intake with water at 4 mg/L) is likely to result in higher bone fracture rates, and the available information suggests an increased likelihood of bone fracture for daily fluoride intakes of 0.05 mg/kg/day (average adult fluoride intake at 2 mg/L). The Agency for Toxic Substances and Disease Registry (ATSDR) has identified a chronic-duration Minimal Risk Level (MRL) for oral exposure to fluoride of 0.05 mg/kg/day, based on an increased risk of bone fracture (ATSDR 2003). The NRC's findings (NRC 2006) indicate that the ATSDR's MRL is not protective enough. The available studies consider fluoride intake only in terms of the concentration in the local drinking water, and most use fluoridated water (1 mg/L, corresponding to an average daily intake of 0.03 mg/kg/day for adults) as a control. Thus there is probably considerable overlap in exposures between groups, making effects more difficult to distinguish, and the entire dose response range of interest has not been well studied. The findings in humans are consistent with animal studies that have found increased brittleness of bones with increased fluoride exposure (Clark and Mann 1938; Turner et al. 1997; 2001).

Danielson et al. (1992) reported an increased relative risk for hip fracture in a fluoridated area of 1.27 (95% CI 1.08-1.46) for women and 1.41 (95% CI 1.00-1.81) for men. These authors reported a difference between women exposed to fluoride prior to menopause and those exposed afterwards. For women exposed prior to menopause, the fracture risk was considerably higher than for those not exposed to fluoride. Many studies of fracture risk have not looked at age-specific exposure, or have involved women exposed only after menopause, when fluoride uptake into bone is probably substantially lower.

The Iowa study reported effects on bone mineral concentration and bone mineral density with average childhood fluoride intakes of 0.02-0.05 mg/kg/day (Levy et al. 2009). Linear correlation between dental fluorosis and risk of bone fracture has been reported for children and adults (Alarcón-Herrera et al. 2001). Bone fracture rates in children in the U.S. may be increasing (e.g., Khosla et al. 2003), but fluoride exposure has not been examined as a possible cause or contributor.

### *Carcinogenicity*

Three U.S. courts have found water fluoridation to be injurious to human health, specifically that it may cause or contribute to the cause of cancer and genetic damage (described in detail by Graham and Morin 1999). The NRC's committee on fluoride toxicology unanimously concluded that "Fluoride appears to have the potential to initiate or promote cancers," even though the overall evidence is "mixed" (NRC 2006). Referring to the animal studies, the committee also said that "the nature of uncertainties in the existing data could also be viewed as supporting a greater precaution regarding the potential risk to humans." The committee discussed the limitations of epidemiologic studies, especially ecologic studies (those in which group, rather than individual, measures of exposure and outcome are used), in detecting small increases in risk—in other words, the studies are not sensitive enough to identify small increases in cancer risk; therefore a "negative" study does not necessarily mean that there is no risk (see also Cheng et al. 2007).

While the NRC did not assign fluoride to a specific category of carcinogenicity (i.e., known, probable, or possible), the committee did not consider either “insufficient information” or “clearly not carcinogenic” to be applicable. The committee report (NRC 2006) includes a discussion of how EPA establishes drinking water standards for known, probable, or possible carcinogens; such a discussion would not have been relevant had the committee not considered fluoride to be carcinogenic. The question becomes one of how strongly carcinogenic fluoride is, and under what circumstances.

The case-control study by Bassin et al. (2006) is the only published study thus far to have looked at age-dependent exposure to fluoride. This study reported a significantly elevated risk of osteosarcoma in boys as a function of estimated age-specific fluoride intake. Osteosarcoma is a bone cancer that commonly results in amputation of an affected limb and may result in death. At the very least, this study indicates that similar studies of pediatric osteosarcoma that have not looked at age-dependent intake cannot be considered to show “no effect.”

While a few other studies (e.g., Gelberg et al. 1995) have looked at individual fluoride exposure (as opposed to group or ecologic measures of exposure), these have looked at total fluoride exposure until time of diagnosis or treatment. Given that there is a “lag time” of a few years between onset of a cancer and its diagnosis, use of cumulative fluoride exposure until time of diagnosis is potentially misleading, as fluoride exposure during the last several years (during the “lag time”) cannot have contributed to the initiation of a cancer but could have a significant effect on the estimate of cumulative fluoride exposure.

The 1990 National Toxicology Program (NTP) study on sodium fluoride officially concluded that “there was *equivocal evidence of carcinogenic activity* of sodium fluoride in male F344/N rats, based on the occurrence of a small number of osteosarcomas in dosed animals” (NTP 1990; italics in the original). According to the published report, a “small number of osteosarcomas occurred in mid- and high-dose male rats. These neoplasms occurred with a significant dose response trend, but at a rate within the upper range of incidences previously seen in control male rats in NTP studies” (NTP 1990). It is important to realize that the historic controls from previous studies had not had the special low-fluoride diet used for this study, and therefore more properly constitute a low- to mid-range exposed group rather than a control group. This and other concerns were described in a memo within the Environmental Protection Agency (Marcus 1990) and reported in the press (Hileman 1990). These concerns and the testimony before the U.S. Senate of the union representing EPA scientists (Hirzy 2000) should be taken seriously by the HHS.

In humans, osteosarcomas tend to occur most commonly in young people (pediatric cases) or the very old (adult or geriatric cases), with a higher incidence in males than in females (Bassin et al. 2006). Sergi and Zwerschke (2008) indicate that 60-75% of cases are in patients between 15 and 25 years old. In the NTP 2-year study, fluoride exposure was begun when the animals were 6 weeks old, as is typical for NTP and similar studies (Hattis et al. 2004). Puberty in the rat typically occurs at about 32 days of age in females and 42 days in males (e.g., Gray et al., 2004; Evans 1986). Thus, the age of 6 weeks in the NTP study probably corresponds to pubertal or post-pubertal animals. The cases of osteosarcoma in the rats were reported in the late stages of the test, and probably corresponded to geriatric osteosarcomas in humans. In Bassin’s study, the age range for which the fluoride-osteosarcoma association was most apparent was for exposures at ages 4-12 years, with a peak for exposures at age 6-8 years (Bassin et al. 2006). Very likely,



the fluoride exposures in most of the animal studies have started after the age corresponding to the apparent most susceptible age in humans, and thus these animal studies may have completely missed the most important exposure period with respect to initiation of the majority of human osteosarcomas. Therefore, this animal study cannot be interpreted as showing no evidence of causation for pediatric osteosarcoma, although, properly interpreted, it does show evidence for causation of geriatric osteosarcoma.

### *Genotoxicity*

Genotoxicity, or the ability to damage the genetic material (genes and chromosomes) of cells, is considered indicative of potential carcinogenicity. A number of mammalian *in vitro* systems have shown dose-dependent cytogenetic or cell transformational effects from fluoride exposure (reviewed by NRC 2009). Several reports suggest an indirect or promotional mechanism, e.g., inhibition of DNA synthesis or repair enzymes, rather than a direct mutagenic effect (Lasne et al. 1988; Aardema et al. 1989; Aardema and Tsutsui 1995; Meng and Zhang 1997). Human cells seem to be much more susceptible to chromosome damage from fluoride than are rodent cells (Kishi and Ishida 1993).

A recent paper by Zhang et al. (2009) describes a new testing system for potential carcinogens, based on induction of a DNA-damage response gene in a human cell line. Sodium fluoride tests positive in this system, as do a number of other known carcinogens, representing a variety of genotoxic and nongenotoxic carcinogenic mechanisms. Known noncarcinogens—chemicals not associated with carcinogenicity—did not test positive. The system described by Zhang et al. (2009) is considerably more sensitive than the older systems for most chemicals examined; a positive effect was seen at a fluoride concentration of about 0.5 mg/L, or a factor of 10 lower than in other systems.

A fluoride concentration of 0.5 mg/L in urine will routinely be exceeded by many people consuming fluoridated water (NRC 2006); for people with substantial fluoride intake, serum fluoride concentrations may also reach or exceed 0.5 mg/L. Acute fluoride exposures (e.g., accidental poisoning, fluoride overfeeds in drinking water systems) have resulted in fluoride concentrations in urine well in excess of 5 mg/L in a number of cases (e.g., Penman et al. 1997; Björnhagen et al. 2003; Vohra et al. 2008). Urine fluoride concentrations can also exceed 5 mg/L if chronic fluoride intake is above about 5-6 mg/day (0.07-0.09 mg/kg/day for an adult; based on NRC 2006). Thus, kidney and bladder cells are probably exposed to fluoride concentrations in the ranges at which genotoxic effects have been reported *in vitro*, especially when the more sensitive system of Zhang et al. (2009) is considered. Based on the results of Zhang et al. (2009), most tissues of the body are potentially at risk if serum fluoride concentrations reach or exceed 0.5 mg/L. In addition, cells in the vicinity of resorption sites in fluoride-containing bone are potentially exposed to very high fluoride concentrations in extracellular fluid (NRC 2006) and thus are also at risk for genotoxic effects.

### *Endocrine effects*

The NRC (2006) concluded that fluoride is an endocrine disruptor. Endocrine effects include altered thyroid function or increased goiter prevalence (at fluoride intakes of 0.05-0.1 mg/kg/day,

or 0.01-0.03 mg/kg/day with iodine deficiency), impaired glucose tolerance (at fluoride intakes above 0.07 mg/kg/day), a decrease in age at menarche in girls in fluoridated towns, and disruptions in calcium metabolism (calcitonin and parathyroid function, at fluoride intakes of 0.06-0.15 mg/kg/day or higher). ATSDR's toxicological profile for fluoride (ATSDR 2003) refers to an animal study of thyroid function that would give a lower MRL (value not given) than the MRL derived for bone fracture risk (0.05 mg/kg/day).

Thyroid dysfunction and Type II diabetes presently pose substantial health concerns in the U.S. (NRC 2006). Of particular concern is an inverse correlation between subclinical maternal hypothyroidism and the IQ of the offspring. In addition, maternal subclinical hypothyroidism has been proposed as a cause of or contributor to development of autism in the child (Román 2007; Sullivan 2009). Steingraber (2007) has described the decrease in age at puberty of U.S. girls and the associated increased risk of breast cancer. Calcium deficiency induced or exacerbated by fluoride exposure may contribute to other health effects (NRC 2006).

#### *Increased blood lead levels*

An increased likelihood of elevated blood lead levels is associated with use of silicofluorides (usually  $\text{H}_2\text{SiF}_6$  or  $\text{Na}_2\text{SiF}_6$ ) as the fluoridating agent (NRC 2006; Coplan et al. 2007). Approximately 90% of people on fluoridated water are on systems using silicofluorides (NRC 2006). The chemistry and toxicology of these agents, especially at low pH (e.g., use of fluoridated water in beverages such as tea, soft drinks, or reconstituted fruit juices), have not been adequately studied (NRC 2006). Associations between silicofluoride use and biological effects in humans have been reported, in particular, elevated levels of blood lead in children and inhibition of acetylcholinesterase activity (reviewed by Coplan et al. 2007). A recent study in rats found significantly higher concentrations of lead in both blood and calcified tissues of animals exposed to both silicofluorides and lead (Sawan et al. 2010).

In addition to biological effects of silicofluorides, the interaction of silicofluorides (as the fluoridating agent) and disinfection agents (specifically, chloramines) also increases the leaching of lead from plumbing fixtures into drinking water (Maas et al. 2005; 2007). A recent Congressional investigation discussed the failure of the CDC to publicize information about high lead levels in drinking water and children's blood in Washington, D.C. (Leonnig 2010). The interaction of silicofluorides and chloramines is the probable explanation for the high lead levels (Maas et al. 2005; 2007). EPA considers lead to be a probable human carcinogen and to have no practical threshold with respect to neurotoxicity (EPA 2004b)—in other words, there is considered to be no safe level of lead exposure, and the MCLG for lead is zero (EPA 2006a).

#### *Additional adverse health effects*

Fluoride intake is likely to affect the male reproductive-hormone environment, beginning at intakes of around 0.05 mg/kg/day (reviewed by NRC 2009). A "safe" intake with respect to male reproductive effects is probably somewhere below 0.03 mg/kg/day.

The NRC has reviewed the possible association between exposure to fluoridated water (approximately 0.02 mg/kg/day for adults) and increased risk of Down syndrome (trisomy 21) in children of young mothers, discussed a possible mechanism, and recommended further study

(NRC 2006). Fetuses with Down syndrome are less likely to survive to birth, due both to higher natural fetal loss and to a high rate of pregnancy termination (Buckley and Buckley 2008; Forrester and Merz 1999; Siffel et al. 2004; Biggio et al. 2004).

Hypersensitivity or reduced tolerance to fluoride has been reported for exposure to fluoridated water (approximately 0.02 mg/kg/day for adults) or use of fluoride tablets (approximately 1 mg/day). Symptoms include skin irritation, gastrointestinal pain and symptoms (nausea, vomiting, diarrhea, constipation), urticaria, pruritus, stomatitis, chronic fatigue, joint pains, polydipsia, headaches, and other complaints (Waldbott 1956; 1958; Feltman and Kosel 1961; Grimbergen 1974; Petraborg 1977; Spittle 2008; reviewed by NRC 2006). Patients were often unaware that their drinking water contained fluoride. Symptoms improved with avoidance of fluoridated water and recurred with consumption of fluoridated water or with experimental challenge with sodium fluoride. Double-blind tests of patients have confirmed hypersensitivity to fluoride (Grimbergen 1974; Waldbott 1956; 1958). Many of the observed symptoms represent true allergic phenomena, while others (e.g., gastrointestinal symptoms) could be due to a lower level of tolerance for fluoride (intoxication at lower exposure; Waldbott 1956; 1958).

### **(3) Available data do not support a role of community water fluoridation in improving dental health.**

HHS continues to consider community water fluoridation to be important in the prevention of dental caries (Federal Register 2011). However, the question of whether water fluoridation actually produces a benefit requires further attention.

The University of York has carried out perhaps the most thorough review to date of human studies on effects of fluoridation. Their work (McDonagh et al. 2000) is cited by HHS and others as showing the safety and efficacy of water fluoridation, but it actually does neither (Wilson and Sheldon 2006; Cheng et al. 2007). The report mentions a surprising lack of high quality studies demonstrating benefits, and also finds little evidence that water fluoridation reduces socioeconomic disparities:

Given the level of interest surrounding the issue of public water fluoridation, it is surprising to find that little high quality research has been undertaken. (McDonagh et al. 2000)

Water fluoridation aims to reduce social inequalities in dental health, but few relevant studies exist. The quality of research was even lower than that assessing overall effects of fluoridation. (Cheng et al. 2007)

Evidence relating to reducing inequalities in dental health was both scanty and unreliable. (Wilson and Sheldon 2006)

The apparent benefit is modest, about a 15% difference in the proportion of caries-free children (McDonagh et al. 2000). The American Dental Association (2005) states that “water fluoridation continues to be effective in reducing dental decay by 20-40%,” which would translate to less than 1 decayed, missing, or filled permanent tooth (DMFT) in older children and adolescents (based on U.S. data from CDC 2005).

Neither McDonagh et al. (2000) nor the ADA (2005) mentions that fluoride exposure appears to delay the eruption of permanent teeth, although this has been known since the 1940s (Short 1944; NRC 2006). A delay in tooth eruption alters the curve of caries rates with respect to age and complicates the analysis of age-specific caries rates (Psoter et al. 2005; Alvarez 1995; Alvarez and Navia 1989). Komárek et al. (2005) have calculated that the delay in tooth eruption due to fluoride intake may explain the apparent reduction in caries rates observed when comparisons are made at a given age, as is usually done.

Most studies of benefits of fluoride intake or fluoridation have failed to account for a number of important variables, including individual fluoride intakes (as opposed to fluoride concentrations in the local water supplies), sugar intake, socioeconomic variables, and the general decline in caries rates over the last several decades, independent of water fluoridation status. When World Health Organization data on oral health of children in various countries are compared, similar declines in caries over time are seen in all developed countries, regardless of fluoridation status (Cheng et al. 2007; Neurath 2005).

The only peer-reviewed paper to be published from California's major oral health survey in the 1990s reported no association between fluoridation status and risk of early childhood caries (Shiboski et al. 2003). The paper did not address other types of caries.

A number of sources (reviewed by NRC 2006), including the CDC (2001), indicate that any beneficial effect of fluoride on teeth is topical (e.g., from toothpaste), not from ingestion. Featherstone (2000) describes mechanisms by which topical fluoride has an anti-caries effect and states that “[f]luoride incorporated during tooth development [i.e., from ingested fluoride] is insufficient to play a significant role in caries protection.” Also:

The fluoride incorporated developmentally—that is, systemically into the normal tooth mineral—is insufficient to have a measureable effect on acid solubility. (Featherstone 2000)

The prevalence of dental caries in a population is not inversely related to the concentration of fluoride in enamel, and a higher concentration of enamel fluoride is not necessarily more efficacious in preventing dental caries. (CDC 2001)

Fluoride concentrations in drinking water or saliva are too low to be contributing significantly to a topical anti-caries effect, especially since most drinking water is not "swished" around the teeth before being swallowed. CDC (2001) states that "The concentration of fluoride in ductal saliva, as it is secreted from salivary glands, is low—approximately 0.016 parts per million (ppm) in areas where drinking water is fluoridated and 0.006 ppm in nonfluoridated areas. This concentration of fluoride is not likely to affect cariogenic activity."

The single study that has examined caries experience in relation to individual fluoride intakes at various ages during childhood (the Iowa study) has found no association between fluoride intake and caries experience; caries rates (% of children with or without caries) at ages 5 and 9 were similar for all levels of fluoride intake (Warren et al. 2009). The authors state that “the benefits of fluoride are mostly topical” and that their “findings suggest that achieving a caries-free status may have relatively little to do with fluoride *intake*” (emphasis in the original). Most of the children with caries had "relatively few decayed or filled surfaces" (Warren et al. 2009). The authors' main conclusion:

Given the overlap among caries/fluorosis groups in mean fluoride intake and extreme variability in individual fluoride intakes, firmly recommending an “optimal” fluoride intake is problematic. (Warren et al. 2009).

The national data set collected in the U.S. in 1986-1987 (more than 16,000 children, ages 7-17, with a history of a single continuous residence) shows essentially no difference in caries rates in the permanent teeth of children with different water fluoride levels (Table 1; Fig. 2; data obtained from Heller et al. 1997; similar data can be obtained from Iida and Kumar 2009). Analysis in terms of mean DMFS (decayed, missing, or filled tooth surfaces) for the group (Fig. 3), as opposed to caries prevalence, shows an apparent 18% decrease between the low-fluoride (< 0.3 mg/L) and fluoridated (0.7-1.2 mg/L) groups. In absolute terms, this is a decrease of about 1/2 (0.55) of one tooth surface per child. One possible explanation is delayed tooth eruption, which was not considered in the study. Note that the mean DMFS for the highest fluoride group is higher than for either of the two intermediate groups, also indicating that DMFS scores are not solely a function of water fluoride concentration. When the data are examined by the distribution of DMFS scores (Fig. 4), no real difference in caries experience with respect to water fluoride concentration is observed.

The available data, responsibly interpreted, indicate little or no beneficial effect of water fluoridation on oral health. The HHS should not assume or suppose beneficial effects of community water fluoridation and should not continue to support or encourage water fluoridation, even at the proposed level of 0.7 mg/L.

**(4) HHS remains in the precarious position of recommending indiscriminate administration of a drug to the American population, without individual evaluation of need, appropriate dose, efficacy, or side effects.**

The U.S. Food and Drug Administration (FDA) considers fluoride in toothpaste to be a non-prescription drug (e.g., FDA undated-a; undated-b) and fluoride “supplements” (usually tablets or lozenges) to be prescription drugs (e.g., Medline Plus 2008). The goal of community water fluoridation is to provide a dental health benefit to individuals and to the population generally (Federal Register 2010), and EPA's recent reference (Federal Register 2010) to a "treated population" acknowledges this use of drinking water systems to deliver a drug to entire populations. This in effect puts local governments and water treatment personnel in charge of administering a chemical (i.e., a drug) to the population in an effort to improve individual and population health (Cross and Carton 2003; Cheng et al. 2007). In this context, HHS should be aware that many people consume more fluoride from tap water than from either non-prescription (toothpaste) or prescription (tablets or lozenges) fluoride sources, without any monitoring for either efficacy or side effects, without the “drug information” or warning labels generally provided for drugs, and without any semblance of informed consent.

In addition, most fluoridation operations use fluorosilicates (usually  $H_2SiF_6$  or  $Na_2SiF_6$ ) rather than sodium fluoride (NaF). As described above, the chemistry and toxicology of these compounds have not been adequately studied, although important differences in biological effects between silicofluorides and simple fluorides (e.g., NaF) have been reported (Coplan et al. 2007; NRC 2006; Masters et al. 2000; Masters and Coplan 1999). HHS no doubt is aware of the variety of effects (both targeted effects and side effects) associated with fluoride-containing,

FDA-approved, pharmaceutical agents (e.g., Prozac, Sevoflurane, Fenfluramine). The NRC (2006) discussed the increased toxicity of aluminofluorides and beryllifluorides vs. fluoride alone, as well as the different mechanisms of action of the different chemical combinations. Thus it is irresponsible for HHS to recommend addition of fluoride, or a particular concentration of fluoride to be added, without a comprehensive review of the substances ( $H_2SiF_6$  or  $Na_2SiF_6$ ) that are actually added. HHS should also be aware that fluoridation chemicals often contain impurities such as lead and arsenic, for which EPA has set MCLGs of zero (EPA 2006), such that a water supplier is actually adding contaminants for which the ideal maximum amount in drinking water is zero.

HHS refers to a plan to "enhance surveillance of dental caries, dental fluorosis, and fluoride intake" (Federal Register 2011). CDC conducts periodic biomonitoring studies (e.g., CDC 2009), in which a number of chemicals in blood or urine of members of the U.S. population are measured. The HHS has made no mention of whether fluoride will be added to the list of chemicals, although this was recommended by the National Research Council (NRC) in 2006 and would be an obvious action to take if CDC or HHS is truly interested in knowing how much fluoride exposure is received by the American public.

In summary, HHS should not continue to promote or encourage uncontrolled exposure of the U.S. population to a drug that, at best, is not appropriate for many individuals (e.g., those who do not want it, those whose water consumption is high, formula-fed infants) and for which the risks are inadequately characterized and inadequately disclosed to the public. HHS should act in the interest of public health by eliminating community water fluoridation in the U.S. at the earliest possible date.

Table 1. Caries prevalence and fluorosis prevalence with water fluoride concentration.<sup>a</sup>

Water fluoride concentration mg/L	Children with no caries %	Mean DMFS score <sup>b</sup>	Children with fluorosis <sup>c</sup> %	Mean severity of fluorosis <sup>d</sup>
< 0.3	53.2	3.08	13.5	0.30
0.3 - < 0.7	57.1	2.71	21.7	0.43
0.7 - 1.2	55.2	2.53	29.9	0.58
> 1.2	52.5	2.80	41.4	0.80

<sup>a</sup> Data for permanent teeth of children ages 5-17 (caries experience and DMFS score) or 7-17 (dental fluorosis), with a history of a single residence, from Tables 2 and 5 of Heller et al. (1997).

<sup>b</sup> Decayed, missing, or filled tooth surfaces (permanent teeth).

<sup>c</sup> Includes very mild, mild, moderate, and severe fluorosis, but not "questionable."

<sup>d</sup> Dean's Community Fluorosis Index.

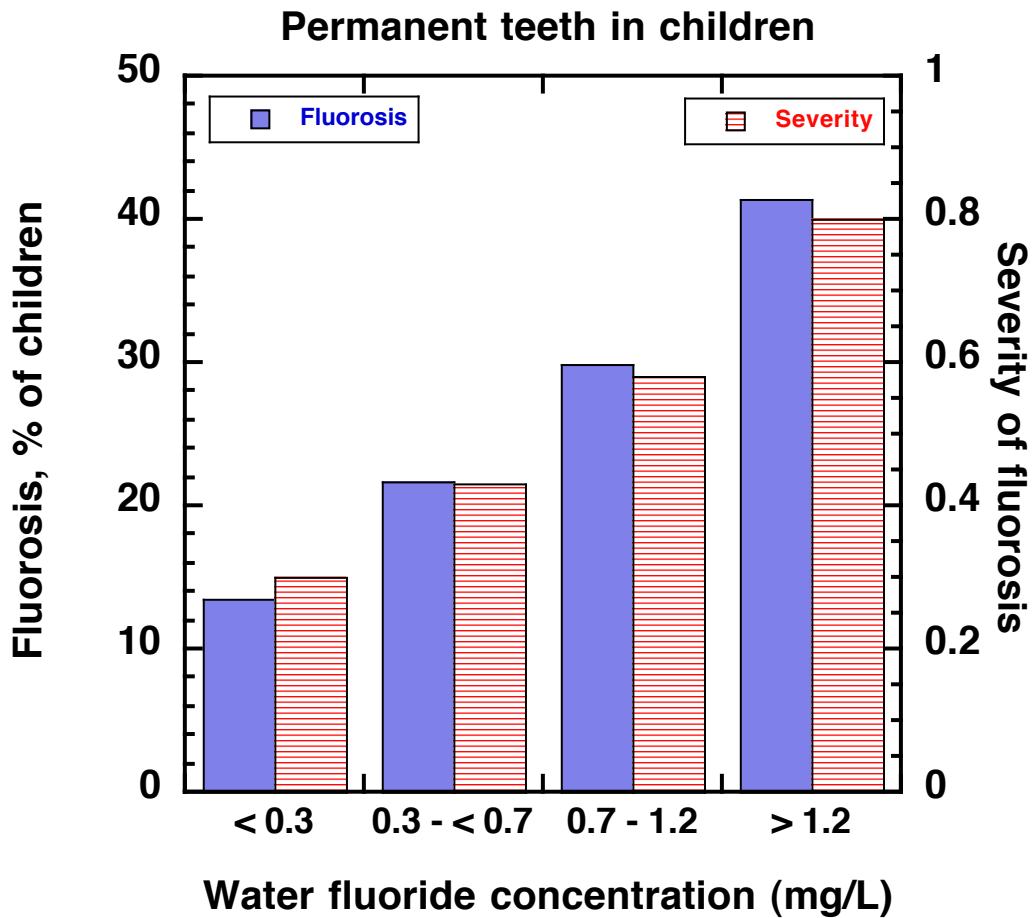


Fig. 1. Fluorosis prevalence and severity with water fluoride concentration for children ages 7-17 with a history of a single continuous residence. Data are shown as (left) % of total children having fluorosis (very mild, mild, moderate, or severe, but not questionable) or (right) severity of fluorosis by Dean's Community Fluorosis Index. Numerical values are provided in Table 1 of these comments and were obtained from Table 5 of Heller et al. (1997).



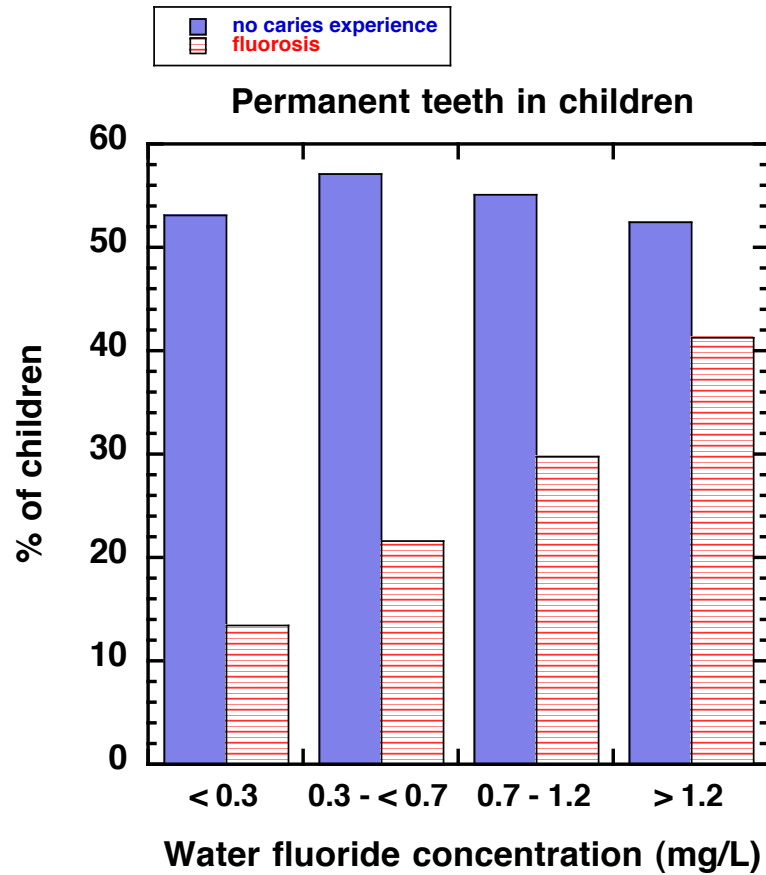


Fig. 2. Percent of children with no caries experience in the permanent teeth (DMFS = 0) and with fluorosis, with respect to water fluoride concentration. Data are shown as % of total children having no caries experience (blue) or having fluorosis (very mild, mild, moderate, or severe, but not questionable; red). Numerical values are provided in Table 1 of these comments and were obtained from Tables 2 and 5 of Heller et al. (1997).

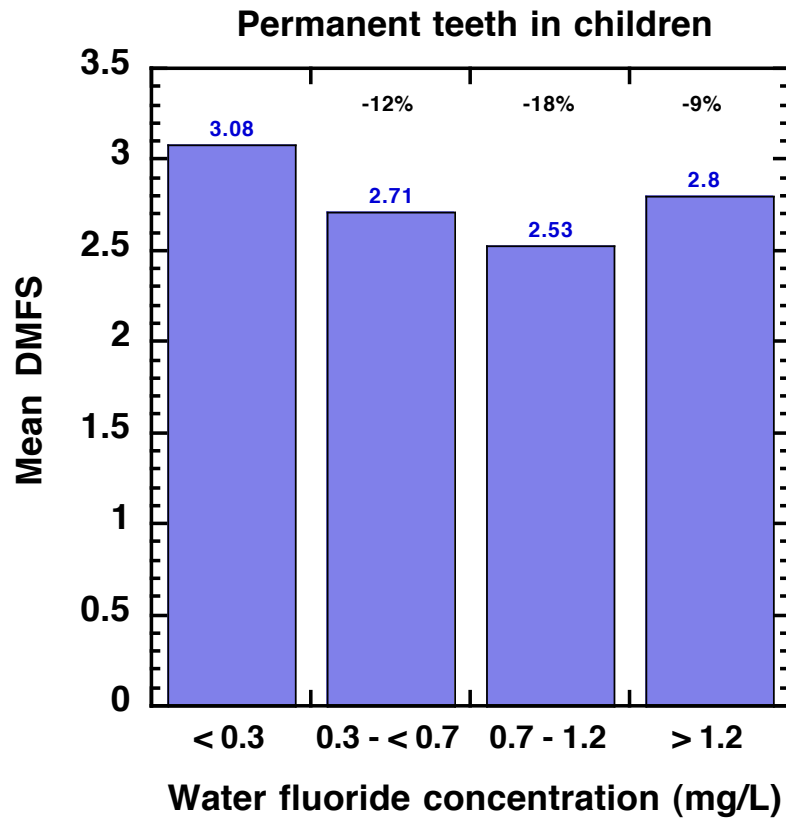


Fig. 3. Mean DMFS score (decayed, missing, or filled permanent tooth surfaces in permanent teeth), with respect to water fluoride concentration. Numerical values are provided in Table 1 of these comments and were obtained from Table 2 of Heller et al. (1997). The percent difference with respect to the lowest fluoride group is also provided.

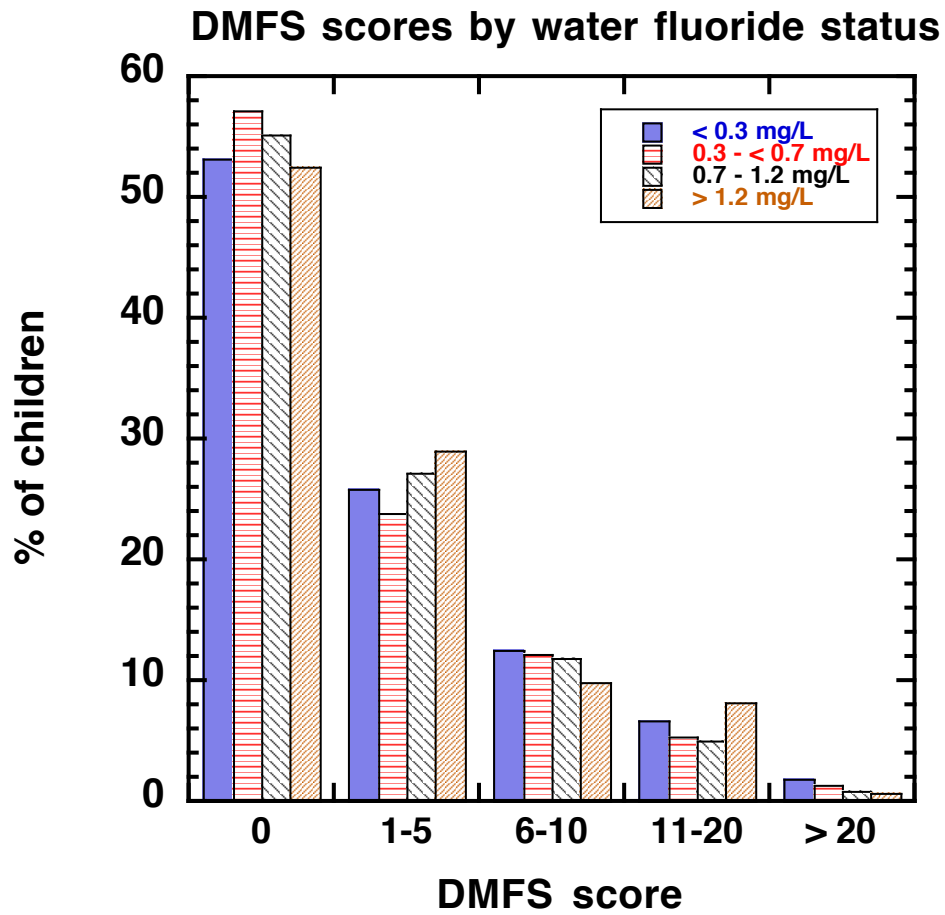


Fig. 4. Percent of children by DMFS score, with respect to water fluoride concentration. Data are shown as % of total children in a given group according to the number of decayed, missing, or filled tooth surfaces in the permanent teeth (DMFS). Data were obtained from Table 2 of Heller et al. (1997).

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