Talking Points: National Toxicology Program (NTP) Monograph and Environmental Protection Agency (EPA) Ruling response by DOH

Last updated date 10.10.24

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Key Messages:

- DOH is aware of the newly released NTP review, and we are critically examining the data presented.
- We are also aware of the recent federal district court ruling against the U.S. Environmental Protection Agency (EPA), ordering the agency to further evaluate possible health risks from recommended fluoride levels in the U.S. Drinking Water supply. We look forward to the EPA's evaluation.
- Evidence shows that community water fluoridation at optimal levels prevents tooth decay and promotes oral health in children and adults.

Background on NTP Review:

- The National Toxicology Program, part of the Department of Health and Human Services, released its "Monograph on the State of Science Concerning Fluoride Exposure and Neurodevelopment and Cognition," which found that excessive fluoride exposure can be associated with lower IQ in children.
- DOH is currently reviewing the newly released review. We continue to endorse community water fluoridation as safe and beneficial to oral health.

Assessment:

- The NTP monograph does not find harm associated with the current recommended levels for optimally fluoridated water levels per the US Public Health Service recommendations.
- The monograph found possible harm statistically associated with naturally occurring levels of fluoride that are more than double the amount used for community water fluoridation, but did not determine if the fluoride caused the harm.
- The monograph emphasizes that it does not address whether the exposure to fluoride added to drinking water is associated with a measurable effect on IQ, nor does the monograph assess benefits of the use of fluorides in oral health or provide a risk/benefit analysis.

Background on EPA Ruling:

- The EPA assesses safe levels of additives to drinking water for health and sets standards to protect communities. Under the Safe Drinking Water Act, the EPA sets limits on what is allowed and what is recommended
 - Fluoride is but one such example. Fluoride is an element that is found naturally in water and may also be added to the water by drinking water systems to promote strong teeth and prevent tooth decay.
- Food & Water Watch, an environmental non-profit group, and several anti-fluoride groups including the Fluoride Action Network, challenged the EPA in court after their petition to ban water fluoridation was denied by the EPA in 2017.
- A federal district court ruled on Tuesday, Sept. 24, 2024, against the EPA, ordering the agency take action to further evaluate possible health risks from recommended fluoride levels in the U.S. drinking water supply.
- The judge's ruling heavily cites the aforementioned National Toxicology Program (NTP) review released in August, which concluded that "higher levels" of fluoride can be associated with lowered IQ in children.
 - The NTP Monograph clearly stated that it does not address whether fluoride in drinking water at recommended level (0.7 mg/L) is associated with a measurable effect on IQ.
- Nowhere in its decision does the US Court order the EPA to ban water fluoridation.
- The EPA may issue a new rule, or it might appeal this decision.

Community water fluoridation (CWF) is safe and effective:

- The U.S. Public Health Services' <u>recommendation</u> is that the amount of fluoride needed in water to help prevent tooth decay is 0.7 parts per million, which is supported by the Centers for Disease Control and Prevention (CDC) and many other public health authorities.
- For more than 80 years, public water systems across the country have adjusted the
 existing and naturally- occurring fluoride levels in drinking water to the recommended
 optimum concentration to help prevent tooth decay.
- Today, even with wide-spread availability of fluoride toothpaste, studies show community water fluoridation continues to be effective in reducing tooth decay by about 25 percent in children and adults.
- National health organizations such as the American Academy of Pediatrics and the American Dental Association continue to support community water fluoridation as safe and effective. AAP and ADA experts have issued these responses to the NTP review:
 - American Academy of Pediatrics (AAP): <u>AAP stands by recommendations for low</u> fluoride levels to prevent caries | AAP News | American Academy of Pediatrics
 - Campaign for Dental Health (AAP): <u>Troubled Government Report Finally Sees the</u> Light of Day

- American Dental Association (ADA) Press Release: <u>American Dental Association</u>
 <u>Reaffirms Support for Community Water Fluoridation | American Dental</u>
 Association (ada.org)
- ADA News: <u>National Toxicology Program releases fluoride exposure monograph</u>
 | American Dental Association (ada.org)

Holding Statement on NTP Review (as of 9.25.24):

"The Washington State Department of Health is taking a critical look at the newly released review, "Monograph on the State of Science Concerning Fluoride Exposure and Neurodevelopment and Cognition," in relation to community water fluoridation in Washington state.

Community water fluoridation at optimal levels continues to be a cornerstone strategy for the prevention of tooth decay. It is a practical, cost-effective, and equitable way for communities to improve their residents' oral health regardless of age, education, or income. (CDC, <u>About Community Water Fluoridation | Fluoridation | CDC</u>)"

Holding Statement on EPA Ruling (as of 10.1.24):

The Washington State Department of Health is working to assess the science presented in this case, and we are in the process of reviewing the district court's decision. While the district court has not found with certainty that fluoridated water is a risk to public health, they have concluded there is enough risk of injury to trigger EPA action under the Toxic Substances Control Act. The finding defers to EPA's expertise as to how to evaluate and regulate fluoride in drinking water, and the EPA is working with the Department of Justice to determine next steps.