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Scientific Integrity and a Fluoride Hazard to Public Health

NFFE Local 2050, representing headquarters professionals at the U.S. Environmental Protection Agency, was the first organization within the federal government to call attention to the public health hazards – plural – of fluoride exposures. We are gathered now to consider the merits of the analysis made by another organized group of scientists within that establishment, the National Toxicology Program, of a specific hazard of such exposures.

Other commenters are covering the scientific details on that hazard, but the main thrust of my comments is scientific integrity. Scientific integrity was the main reason NFFE Local 2050 was organized early in the Ronald Reagan Administration, and it remains a main reason for that Union's existence.

Two examples – cited in the addendum to my statement – of how employment issues at EPA involving scientific integrity drew public attention and eventually caused EPA management considerable pain will illustrate why the federal government continues – today in the NTP fluoride monograph case – to stifle employee efforts to do their public service work under those principles.

I am unaware of any other NTP toxicology monograph to be put through five rounds of peer review, including one involving “interested agencies,” before final release.

Local 2050 bargained with management over scientific integrity for several years, reaching draft 13 in that effort by 1988. Management broke off bargaining when the toxic carpet issue (see Addendum) made international news in the late 1980's. Nevertheless, we were finally able to persuade management in 1998 to adopt the first such program in the federal government, EPA's Principles of Scientific Integrity.

The PSI turned out to be a toothless “policy statement” by EPA, which has ignored it when convenient, and it continues to do so in the matter of fluoride toxicity, maintaining that 4 mg/L is an adequate public health protective primary drinking water standard.

EPA's example of successfully de-fanging the issue of scientific integrity has not been lost on the whole of the federal science establishment. The current “model program” of scientific integrity recently published by the Office of Science and Technology Policy codifies such toothlessness. (The EPA Labor Coalition is currently working with other entities to establish an enforceable Scientific Integrity program across the federal government.)

The National Toxicology Program's five-round peer review of its fluoride monograph that includes “interested agencies” is today's classic example of attempts to de-fang scientific integrity. NTP's statement in 2019 that “fluoride is presumed to present a neurotoxic hazard,”

was bound to fall victim to “interested agencies” review, even though passing muster with NTP scientists and outside peer review.

So, my take on the whole NTP review process at issue today is, “If the political establishment disagrees with a peer reviewed scientific decision made by qualified scientists, keep on reviewing until the politicians are satisfied. In his investigation of the explosion of the Challenger Space Shuttle caused by Ronald Reagan’s ordering to launch in freezing temperatures, Richard Feynman said it best, ‘You can’t fool Mother Nature.’”

ADDEDENDUM

Local 2050 first became aware in the mid-1980’s of fluoride’s hazards through public comments on EPA’s proposed drinking water regulations. That stimulated our curiosity and eventually our independent analysis. We concluded that EPA’s proposed public health-based standard of 4 milligrams per liter was clearly and grossly wrong, having been written by outside contractors, not EPA employees. (In 2006, a National Academy of Sciences blue-ribbon committee said the same thing.)

We tried quietly through in-house talks with management to have that standard revised to be in conformity with the Safe Drinking Water Act. When that failed and the public became aware of Local 2050’s scientific integrity-based challenge to management’s abandonment of asbestos regulations, we were asked for help. On our own private, off-duty time, we filed an amicus brief in support of a lawsuit challenging those standards. We felt our professional reputations – as EPA employees – were at stake...the public could not differentiate between contractors who did the flawed work and us employees.

Over the years as more and more fluoride toxicity research appeared in the peer-reviewed literature, and requests from citizens for help in fending off mandated fluoridation in their communities continued, we provided that help – outside of duty time. Management was not happy.

Our devotion to scientific integrity and to our sworn duty as public servants were the reasons we did so.

In more recent times, again attempting to quietly engage management, I along with other scientists visited EPA officials twice to report on research showing fluoride’s developmental neurotoxicity. One of the management officials responded, “You mean fluoride is causing as much IQ loss nation-wide as lead?” And: “We’ll take that under consideration in our next 6-year review.” Nothing happened.

Until a lawsuit was filed and the NTP stepped in. And here we are.