

Submission to
Regulatory Authorities
in Ireland and the EU
for Documentation and Information
relating to
**MANDATORY
INGESTION OF FLUORIDE
THROUGH ARTIFICIALLY FLUORIDATED
DRINKING WATER
& ASSOCIATED BEVERAGES & FOODS**
for citizens and residents of the
Republic of Ireland



DECEMBER 2017

FOR THE ATTENTION OF:

Mr. Jerry Grant	Managing Director, Irish Water
Mr. Michael McNicholas	Chairman, Irish Water.
Mr Mike Quinn	Chief Executive Officer, Ervia
Mr. Brendan Murphy	Group Commercial Regulatory Director, Ervia
Ms. Angela Lloyd	Regulatory Affairs Manager, Irish Water
Mr. Jamie Burke	Senior Regulatory Affairs Specialist, Irish Water
Dr Tony Holohan	Chief Medical Officer, Department of Health.
Dr Pamela Byrne	CEO Food Safety Authority of Ireland
Dr Graham Love	Chief Executive of the Health Research Board.
Professor Mark W. J. Ferguson	Chief Scientific Advisor to the Government of Ireland
Ms. Laura Burke	Director General, EPA
Dr Leo Varadkar. T.D.	Department of the Taoiseach
Mr. Martin Fraser	Secretary General to the Government
Mr. Simon Harris. T.D.	Minister for Health
Mr. Jim Breslin	General Secretary, Department of Health
Mr. Eoghan Murphy	Minister for Housing, Planning and Local Government
Mr. John McCarthy	General Secretary, Dept Environment, Community & Local Gov
Ms. Katherine Zappone T.D	Minister for Children and Youth Affairs
Mr. Michael Creed T.D.	Minister for Agriculture, Food and the Marine
Mr. Denis Naughten T.D	Minister for Communications, Climate Action & Environment
Mr. Andrew Doyle T.D	Minister of State with responsibility for Food, Forestry & Horticulture
Mr. Jim Daly T.D	Minister of State with responsibility for Mental Health & Older People
Ms. Catherine Byrne T.D	Minister of State at the Department of Health
Mr. Michael Harty T.D	Chair, Oireachtas Committee on Health
Ms. Roisin Shortall T.D.	Chair, Oireachtas Committee on the Future of Healthcare
Mr Seamus Neely	Chair LASNTG Water Services Training Group
Mr Tom Kirby	Secretary, LASNTG Water Services Training Group
Ms. Emily O'Reilly	European Ombudsman
Ms. Emily Logan	Chief Commissioner of Irish Human Rights & Equality Commission
Dr Bernhard Url,	Executive Director, European Food Safety Authority
Dr Michael Winter	European Food Safety Authority

1. Introduction

Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information requires public authorities, as well as non-public bodies carrying out a public function, to make available and disseminate environmental information to the general public to the widest extent possible. The definition of environmental information encompasses information in any form on the state of the environment, including water, and measures including administrative measures, such as policies, legislation, plans, programmes, environmental agreements, and information on the state of human health and safety, including the contamination of the food chain and conditions of human life in as much as they are, or may be, affected by water quality as well as information pertaining to cost-benefit and economic analyses. Without prejudice, upon request, public authorities shall reply to requests for information as soon as possible, or at the latest within one month after receipt of the applicants request or within two months after the receipt of the request by the public authority if the volume and the complexity of the information is such that the one-month period cannot be complied with. In such cases, the applicant shall be informed as soon as possible, and in any case before the end of that one-month period, of any such extension and of the reasons for it.

In addition to this Directive, the EU approved the Aarhus Convention in 2005 (Council Decision 2005/370/EC of 17 February 2005). The Aarhus Convention recognises that every person has the right to live in an environment adequate to his or her health and well-being, both individually and in association with others, to assert this right and observe this duty, citizens must have access to information, be entitled to participate in decision-making and have access to justice in environmental matters for the benefit of present and future generations. This includes information on the state of the environment and/or on human health issues as well as information on policies and measures taken. Ireland ratified the Aarhus Convention on 20 June 2012.

On the 11th May 2016, a request for information by Mr Waugh was submitted to Irish Water and other regulatory agencies in Ireland to provide specific information pertaining to fluoridation of drinking water supplies.¹ This request was submitted by registered post and copied to the Food Safety Authority, Environmental Protection Agency, the Health Research Board, Ministry of Health, Minister for Local Government, and the Department of the Taoiseach as well as other members of the Oireachtas. The request has been met with silence.

Of relevance to this previous correspondence we now note that Irish Water, through the Local Authority Services National Training Group (LASNTG), have currently tendered for a contract for the development of a training manual, course material and training course on the fluoridation of drinking water in Ireland. The training manual and associated training course is aimed at ensuring that those staff responsible for the delivery of safe and secure drinking water to Irish Water consumers will be adequately trained on the principles, practicalities and risk-based approach to fluoridating drinking water supplies.

Considering the above tender, the specific requests for information that were previously sought in 2016 are repeated overleaf.

¹ Correspondence to Irish Water and its parent company Ervia; Chief Medical Officer, Department of Health; Chief Executive Food Safety Authority of Ireland; Chief Executive of the Health Research Board; Chief Scientific Advisor to the Government of Ireland; Director General, EPA; Department of the Taoiseach; Secretary General to the Government; Minister for Health; General Secretary, Department of Health; Minister for Local Government; General Secretary, Department of Environment, Community and Local Government; Minister for Children and Youth Affairs; Minister for Justice and Equality and others. Dated 11th May 2017.

- A declaration that Irish Water have complied fully with the requirements of EC 1907/2006. This declaration shall include evidence of specific hazard assessments, including chemical toxicological and metabolic studies, eco-toxicological studies, reproductive toxicity, medical data including medical surveillance data, epidemiological studies on general population, skin sensitivity studies and allergenicity studies, carcinogenicity studies, mutagenicity studies, sub chronic toxicity studies and other measures taken by Irish Water to ensure the safety of water fluoridation chemicals used in drinking water supplies.
- A declaration that Irish Water have complied fully with the requirements of EC 178/2002. This shall include evidence that food products are properly labelled allowing consumers to identify where fluoridated drinking water supplies have been used in the manufacture and processing of food products or how the addition of fluoridated water to raw or unprocessed food may alter its fluoride content.
- A declaration that Irish Water have determined the probable immediate and/or short-term and/or long-term effects of foods that have been processed using fluoridated water including the probable cumulative toxic effects. This must include details of any risk assessment addressing chronic infant exposure due to reconstitution of powdered infant formula with fluoridated tap water as well as adult cumulative exposure to other dietary sources of fluoride including tea, beer, wine, marine fish, processed foods or fluoridated medications.
- A declaration that artificial fluoridation of drinking water does not pose any risk to neurological health and wellbeing of infants.
- A declaration that artificial fluoridation of drinking water does not impair or disrupt endocrine function in infant, adolescents or adults.
- A declaration that artificial fluoridation of drinking water does not contribute to abnormal bone protein synthesis that may contribute to chronic disease in humans.
- A declaration that artificial fluoridation of drinking water does not contribute to cardiac toxicity in humans.
- A declaration that artificial fluoridation of drinking water does not contribute to systemic or chronic inflammation among infants, children, adolescents or adults.
- A declaration that Irish Water have evaluated the effects of combined toxicity of fluoridated water and lead in drinking water for neurotoxicity, carcinogenicity, immunotoxicity, endocrine dysfunction and bone health and that water fluoridation does not pose any health risk for consumers that may have lead contamination in their water.
- A declaration that Irish Water have evaluated the effects of combined toxicity of fluoridated water with aluminium exposure for neurotoxicity, immunotoxicity, carcinogenicity, endocrine dysfunction and bone health and that water fluoridation does not pose any health risk for consumers. This declaration shall include evidence of toxicological studies addressing chronic infant fluoride exposure and the co-toxicity of fluoride with increased aluminium exposure from vaccines and milk based powdered infant formula.
- A declaration that artificial fluoridation of drinking water will not contribute to potentially harmful cumulative fluoride exposure or enhanced toxicity among consumers residing in communities with artificially fluoridated drinking water who are also prescribed fluoridated medications by a medical practitioner.
- A declaration that Irish Water have indemnity insurance to cover any liabilities should any member of the public suffer any injury, illness or medical disorder because of the contribution of artificial water fluoridation to cumulative exposures.

2. Precautionary Principle and Safeguarding Public Health

In addition to the previous requests for information, we wish to draw your attention to the recent findings published in the peer reviewed journal *Environmental Health Perspectives* by a team of investigators at the University of Toronto, McGill, the Harvard School of Public Health, and other institutions found an association between fluoride exposure in pregnancy and lower measures of intelligence in children.² This longitudinal study, funded by the US Government's National Institutes of Health, was carried out over a period of 12 years and controlled for a wide range of covariates and sensitivity variables and found that a 0.5 mg/L increase in urinary fluoride concentration was associated with a statistically significantly lower IQ in her offspring.

On the 27th September last, concerns regarding the findings of this study and their relevance to Ireland were communicated in writing by Mr Waugh to the Minister for Health, the Taoiseach, other cabinet members and elected TD's.³ The results of this study are clearly important, more so considering that tea consumption in Mexico is among the lowest in the world at < 0.1 kg per year.⁴

Tea has long been acknowledged as a major source of dietary fluoride since the 1930s and 1940s.^{5,6,7,8,9,10,11,12} In 1983, UK researchers from the Ministry of Agriculture, Fisheries and Food and the Laboratory of the Government Chemist reported that the fluoride content in brands of tea infusions in the UK ranged from 2.0-4.7 mg/L.¹³ The authors reported that tea was the main source of dietary fluoride exposure in the UK population and that while less tea is consumed in the UK than in the 1950s, the fluoride content in tea infusions is higher. In 1984, researchers at the Food Science Division of the Ministry of Agriculture in the UK reported that for high tea consumers the fluoride intake from tea would be about 6.4 mg/day and that fluoridated water would add another 2 mg/day to this.¹⁴ In 1991, another UK study examining fluoride intake and its safety reported that among heavy tea drinker's fluoride intake by adults would be in the region of 9.0mg/day.¹⁵ The WHO (1994) reported that tea infusions may contain up to 8.6mg/L depending on the infusion time and amount and variety of tea.¹⁶ Despite this, no effort has been made by the Department of Health or the Food Safety Authority to educate or inform medical practitioners or the general public, of the health risks of chronic fluoride intoxication posed by excessive or habitual tea consumption and

² Bashash M, Thomas D, Hu H, Martinez-Mier EA, Sanchez BN, Basu N, et al. Prenatal fluoride exposure and cognitive outcomes in children at 4 and 6-12 years of age in Mexico. *Environ Health Perspect*. 2017;125(9):097017. Available from: https://ehp.niehs.nih.gov/wp-content/uploads/2017/09/EHP655.alt_.pdf

³ Correspondence to Taoiseach Dr. Leo Varadkar TD; Minister of Health Mr Simonm Harris; TD, and cabinet colleagues, Mr. Jim Daly TD; Ms. Katherine Zappone T.D; Mr. Finian McGrath T.D; Mr. Pascal Donohoe T.D; Mr. Richard Burton T.D; Mr. Charlie Flanagan T.D. Ms Francis Fitzgerald T.D; Mr. Simon Coveney T.D; Ms. Heather Humphreys T.D; Mr. Michael Creed T.D; Mr. Denis Naughten T.D; Mr. Shane Ross T.D; Mr. Eoghan Murphy T.D; Mr. Michael Ring T.D; Ms Regina Doherty T.D; Mr. Paul Kehoe T.D; Mr. Joe McHugh T.D and Ms. Mary Mitchell O'Connor T.D. Repeal of Health (Fluoridation of Water Supplies) Act, 1960 (No. 46 of 1960), as adapted by the Health Order 1997 (S.I. No. 308 of 1997) and Fluoridation of Water Supplies Regulations 2007 (S.I. No. 42/2007). Dated 22nd September 2017.

⁴ Beresniak A, Duru G, Berger G, et al. Relationships between black tea consumption and key health indicators in the world: an ecological study. *BMJ Open* 2012;2:e000648.

⁵ Reid E. The fluorine content of some Chinese food materials. *Chin. J. Physiol.* 1936; 10:259-272

⁶ McClure FJ. Fluorides in food and drinking water. *Natl Inst Health Bull.* 1939;172:1.

⁷ Cheng LT, Chou TP. The fluorine content of foodstuffs in Szechuan. *Chinese J of Physiol.* 1940;15:263.

⁸ Lawrenz M, Mitchell HH. The relative assimilation of fluorine from fluorine bearing minerals and food (tea) and from water and food. *J. Nutrition.* 1941;22:621.

⁹ McClure FJ. Ingestion of Fluoride and dental caries. *Am J. Diseases Children* 1943;66:365

¹⁰ Clifford PA. Report on fluorine. *Assoc. Off. Agri. Chem.* 1945;28:277.

¹¹ McClure FJ. Fluorine in foods: Survey of recent data. *U.S. Pub. Health Repts.* 1949;64:1061-1074.

¹² Harrison MF. Fluorine Content of Teas Consumed in New Zealand. *British Journal of Nutrition*, 1949;3 (2-3):162-166.

¹³ Walters CB, Sherlock JC, Evans WH, Read JI. Dietary Intake of Fluoride in the United Kingdom and Fluoride Content of some Foodstuffs. *J. Sci, Food Agric.* 1983;34:523-528.

¹⁴ Sherlock JC, Corr MI. Fluorides in Foodstuffs and the Diet. *Perspectives in Public Health.* 1984 February;104(1):34-36.

¹⁵ Jenkins GN. Fluoride intake and its safety among heavy tea drinkers in a British Fluoridated city. *Proceedings of the Finnish Dental Society*, 1991;87: 571-579.

¹⁶ World Health Organization, Fluoride and Oral Health. Report of a WHO Expert Committee on Oral Health Status and Fluoride Use. WHO Technical Report Series 846. Geneva 1994.

no studies were ever undertaken by the authorities to measure the fluoride content in teas for consumption in Ireland.

In 2006, the USA National Research Council (NRC) of the National Academies of Science (NAS) in their review of fluoride in drinking water noted that just half a cup of brewed tea with a fluoride concentration of 3.3 mg/L equals the total background intake of fluoride from all other food sources.¹⁷ The European Food Safety Authority (EFSA) reported that drinking just 2 cups of tea per day (with a fluoride content of 5 mg/L), combined with an average consumption of fluoridated drinking water and the use of fluoridated tap water in the preparation of food, but excluding all other sources (including solid foods, toothpaste and dental products), would provide a daily dietary intake of 6 mg fluoride per day.¹⁸

In the EU, the Tolerable Upper Intake Level (UL) for fluoride has been established at 1.5 mg/day for children aged 1–3 years, 2.5 mg/day for children up to the age of eight years, 5 mg/day for children aged 9 to 14 years and 7 mg/day for children older than 15 years and healthy adults.¹⁹ The Adequate Intake (AI) for healthy adult males and females over 18 years of age is 3.4 mg and 2.9 mg per day respectively.

Knowledge of the fluoride content in tea beverages is therefore essential to all health care professionals especially in a country such as Ireland where most of the population drink tea daily and drinking water supplies are artificially fluoridated in accordance with national legislation. The adjusted fluoride content in drinking water would depend on an accurate assessment of the current fluoride intake habits by the population. Given that for almost a century Ireland has had the highest consumption of tea in the world the need for studies that examine the fluoride content in commercially available tea products and reporting of the findings of such studies is obvious.

Despite an extensive body of literature from the 1930s highlighting that tea is a major source of dietary fluoride intake, the Irish State and its institutions in their enthusiasm to promote and protect the policy of mandatory water fluoridation have demonstrated an astonishing display of ignorance, incompetence and complacency in not addressing cumulative exposures to fluoride and dietary exposure to fluoride from tea consumption in Ireland. Paradoxically, when Ireland commenced water fluoridation, fluoride intake from tea was not even considered by the Department of Health. In 1963, per capita consumption of tea in Ireland was approximately 4.54 kg per person per year, compared to 0.31 kg per person in the USA. In 2003, per capita consumption was 3.43 kg per year in Ireland and 0.33 kg per year in the USA. Since 1968, some fifteen studies have been conducted by different researchers in the UK alone measuring the fluoride content in teas as well as examining dietary intake from tea. During this period comprehensive studies have also been conducted in the Australia, Argentina, Brazil, Ethiopia, China, Chile, Canada, Germany, Gaza, Hong Kong, Iran, Iraq, India, Israel, Indonesia, Japan, Kuwait, Lebanon, Malaysia, Norway, Poland, Pakistan, Portugal, Romania, Slovenia, Spain, South Africa, Senegal, Sri Lanka, Sweden, Taiwan, Turkey and the USA.

Clearly, the Department of Health cannot claim ignorance of the fact that tea was a major source of fluoride given that the Principal Dental Surgeon of the Eastern Health Board and dental researchers at the School of Dental Science at Trinity College Dublin published a review specifically addressing the dental significance of fluoride in tea in the *Journal of the Irish Dental Association* in 1998.²⁰ In this review, the authors noted that it has long been accepted that fluoride accumulates in the leaves of the tea plant and that Ireland has the highest per capita consumption of tea in the world. As noted

¹⁷ United States National Research Council, Review of Fluoride in Drinking Water, United States National Research Council, 2006.

¹⁸ European Food Safety Authority. Scientific Opinion on Dietary Reference Values for fluoride, EFSA Panel on Dietetic Products, Nutrition, and Allergies. EFSA J. 2013, 11, 3332–3378.

¹⁹ Scientific Committee on Food, Scientific Panel on Dietetic Products, Nutrition and Allergies. Tolerable Upper Intake Levels for Vitamins and Minerals, European Food Safety Authority, 2006

²⁰ Kavanagh D, Renehan, J. Fluoride in Tea—Its Dental Significance. J. Ir. Dent. Assoc. 1998, 44, 100–105.

by the authors, the assessment of the fluoride content in tea has been the subject of much research in the UK and elsewhere. Notably, the authors reference a UK study which found that the upper limit of fluoride intake by heavy tea drinkers in a fluoridated city in the UK was 9.9 mg fluoride per day.²¹ In their conclusion, the Principal Dental Surgeon reported that as no data is available on the fluoride levels in teas in Ireland and as Ireland has the highest per capita consumption of tea in the world research should be carried out to measure the fluoride levels in teas available on the Irish market.

Astonishingly, despite this recommendation, the very first risk assessment of fluoride intake from tea and quantification of fluoride levels in tea products available to consumers in Ireland was not conducted until almost two decades later. This study, of which Mr Waugh was a co-author, was published in the peer reviewed *International Journal of Environmental Research and Public Health* in 2016 [22].²² This risk assessment was undertaken by the authors without funding, for the benefit of public health and the advancement of scientific education in the fields of health promotion and disease prevention. In addition to excessive fluoride levels in tea, the study found that water fluoridation was a significant contributor to fluoride intake as tea and other beverages are prepared using fluoridated tap water. This poses many obvious questions, specifically;

- Given that Ireland has both the highest per capita consumption of tea in the world and mandatory water fluoridation, why was no risk assessment undertaken by the State or its institutions responsible for food safety and public health when they were aware that tea was a significant source of fluoride?
- Why does the Department of Health via local authorities, the EPA and Irish Water spend millions of taxpayer's monies annually purchasing fluoridation chemicals, operating water fluoridation plants, inspecting and monitoring water fluoride levels to ensure that fluoride levels in drinking water are strictly maintained between 0.6 and 0.8 mg/L, yet, at the same time tea products consumed by infants, children and over 90% per cent of the adult population remain unregulated and unmonitored when they contain significantly higher fluoride levels than permitted in drinking water or bottled water?
- Clearly, water fluoridation plants are expensive to construct; buildings must be ventilated, temperature controlled, hazard safety precautions must be maintained to protect operators and alarms systems must be installed to prevent exceedances to protect public health as the chemical used for fluoridation is a hazardous chemical. Yet the costs of planning, engineering, design, construction, operation, inspection and maintenance remain concealed. When the regulatory authorities and Department of Health are requested to provide detailed costs, they are either not provided or only the costs of fluoridation chemicals are provided, which do not accurately reflect the official costs in accordance with maintaining this policy, which clearly run into the tens of millions annually.
- Why has there been no biomonitoring of the general population to accurately establish the long-term exposure to fluoride and total body burden in the general population?

²¹ Jenkins GN. Fluoride intake and its safety among heavy tea drinkers in a British Fluoridated city. Proceedings of the Finnish Dental Society, 1991;87, 571–579.

²² Waugh DT., Potter W., Limeback H., Godfrey M, Risk assessment of fluoride intake from tea in the republic of Ireland and its implications for public health and water fluoridation. Int J Environ Res Public Health. 2016 Feb 26;13(3). pii: E259

In an effort to thoroughly examine and understand the relationship between fluoride intake, cumulative exposures and total body burden of fluoride in the population, it is important to consider the following. A study performed in Finland in 1985 found that bone fluoride concentrations were typically 3-fold higher in adult subjects (mean age 60yrs) who had resided in a fluoridated community for approximately 20 years compared with subjects from non-fluoridated areas.²³ In men, the highest concentration was 2750 ppm. In women, the highest concentration of F in bone was found in a subject with impaired renal function (3890 ppm). According to the NRC (2006) these bone fluoride levels lie within the range known to be associated with skeletal fluorosis.²⁴

However, it is important to note that tea consumption is uncommon in Finland and the subjects had not ingested fluoridated water throughout their lifetime. Moreover, the study would not have included exposure from fluoridated toothpaste, which only became widely available from the 1980s onwards. More recently a study conducted in Canada found that the rate of increase in bone fluorine content per year was 3-fold higher for tea drinkers compared to non-tea drinkers.²⁵ As noted previously per capita consumption of tea in Ireland was 3.43 kg per person in 2003. For the same period, per capita consumption in Canada and Finland was 0.59 and 0.18 kg per person respectively. In other words, per capita consumption of tea in Ireland is five-fold higher than Canada and eighteen-fold higher than Finland. Considering that public water has been artificially fluoridated in Ireland since 1964 (53 years compared to 18 years in the Finland study) and per capita intake of tea in 1963 was even higher at 4.54 kg per person per year, evidence strongly suggests that chronic fluoride intoxication is a major undocumented health burden in the Irish population.

It is important to be aware that the NRC (2006) in their review of fluoride in drinking water identified subpopulations that might be particularly susceptible to the effects of fluoride including people with high activity levels (e.g. athletes and workers with physically demanding duties); pregnant or lactating women; individuals with renal disease, because of their high fluid intakes and compromised ability to excrete fluoride which can result in greater accumulation of fluoride in their bodies; the elderly, because of their long-term accumulation of fluoride into their bones; and individuals with medical conditions associated with high water intake or that can make people more susceptible to the effects of fluoride, such as individuals with thyroid disorders or individuals with compromised immune systems.

Moreover, the NRC recommended a wide range of additional epidemiology, toxicology, clinical medicine, environmental exposure, and biomonitoring assessments that need to be undertaken in order to fill data gaps. Further studies were recommended in identifying sources of fluoride and determining bone, soft tissue, plasma, and urinary fluoride levels and further studies to clarify the relationship between fluoride intake, fluoride concentration in bone, clinical symptoms of skeletal fluorosis, and other factors that may influence the risk of bone fractures.

The NRC also recommended that carefully conducted studies of exposure to fluoride and emerging health parameters of interest (e.g., endocrine effects and brain function) should be performed in populations exposed to various concentrations of fluoride. Further studies were recommended to investigate the effects of fluoride on brain, kidney, liver, and immune system function as well as in vivo human genotoxicity studies in the USA population or other populations with nutritional and sociodemographic variables similar to those in the United States. Additional studies were also recommended to investigate the association between fluoride intake and thyroid disease, calcium

²³ Arnala I, Alhava EM, Kauranen P. Effects of fluoride on bone in Finland: Histomorphometry of cadaver bone from low and high fluoride areas. *Acta Orthopaedica*, 1985;56(2), 161–166.

²⁴ United States National Research Council, Review of Fluoride in Drinking Water, United States National Research Council, 2006.

²⁵ Mostafaei F, McNeill FE, Chettle DR, Wainman B. C., Pidruczny AE, Prestwich WV. Measurements of fluorine in contemporary urban Canadians: A comparison of the levels found in human bone using in vivo and ex vivo neutron activation analysis. *Physiological Measurement*, 2015;36(3):465–487.

metabolism, pineal function, and development of glucose intolerance and diabetes. Among their other recommendations the NRC recommended that the USA Environmental Protection Agency (EPA) update its fluoride risk assessment to include new data on health risks and better estimates of total exposure.²⁶ Given the findings and recommendations of the NRC report, this raises another obvious question:

- Notably, why have there been no epidemiology, toxicology, clinical medicine, environmental exposure, or biomonitoring assessments to measure bone, soft tissue, plasma, and urinary fluoride levels in the Irish population and why have there been no human health studies to investigate the effects of fluoride on brain, kidney, liver, and immune system function as well as in vivo human genotoxicity studies in the Irish population?

In follow up, to the NRC 2006 report; an exposure assessment was conducted by the US EPA in 2010, which concluded that the use of fluoridated water for commercial beverage production and the increase of fluoride in solid foods because of fluoridated commercial processes have likely resulted in increased dietary fluoride intake adding to the risk for overexposure.²⁷ Recently, due to potential concerns associated with cumulative fluoride exposure and to ensure a high level of consumer protection, the USA Public Health Service (PHS) finalized a recommendation for lowering the levels of water fluoridation programs to 0.7mg/L for the whole USA.²⁸ Implementation of the new recommendation is expected to lead to a reduction of approximately 25% in fluoride intake from drinking water alone and a reduction of approximately 14% (range 5%–29%) in total fluoride intake.²⁹ This poses further important questions; namely;

- If Public Health Bodies in the USA consider that cumulative exposures to fluoride are a public health problem, and have accordingly reduced the permitted fluoride levels in drinking water to 0.7 mg/L; how can Irish Water or the Irish State, consider that fluoridation of drinking water is safe in a country where the per capita consumption of tea is ten-fold higher than the USA?
- Why has no action has been taken in Ireland to address cumulative exposures, as required by the General Food Law (Regulation (EC) No 178/2002)? Considering the total lack of adequate biomonitoring studies in Ireland regarding either fluoride exposure or fluoride accumulation in the general population, Irish Water are requested to provide rigorous and quantifiable evidence to demonstrate that fluoridation of drinking water is not contributing to chronic fluoride poisoning of the population.

²⁶ United States National Research Council, Review of Fluoride in Drinking Water, United States National Research Council, 2006.

²⁷ United States Environmental Protection Agency, Fluoride: Exposure And Relative Source Contribution Analysis. Washington:EPA, Office of Water, Health and Ecological Criteria Division, 2010, <https://www.epa.gov/dwstandardsregulations/fluoride-risk-assessment-and-relative-source-contribution>

²⁸ United States Department of Health and Human Services, “Press release. HHS issues final recommendation for community water fluoridation,” 2015. <http://www.hhs.gov/news/press/2015pres/04/20150427a.html>.

²⁹ Gooch BF. U.S. public health service recommendation for fluoride concentration in drinking water for the prevention of dental caries. Public Health Reports, 2015;130(4):318–331

This brings us back to the current study, which found an association between maternal fluoride intake in pregnancy and cognitive impairment in children in Mexico City. This study affirms that prenatal fluoride toxicity is an entirely preventable problem and that by working to reduce exposure and by reducing its unnecessary use, it is possible to remove fluoride exposure as a factor that limits children's opportunities to reach their full potential. In this regard, it is disheartening to acknowledge studies by Lynn and Vanhanen (2002 & 2006) which found that the average national intelligence quotients (IQ) for the population of Ireland when assessed by the progressive matrices was significantly lower than the European average.^{30,31} According to the authors, the three countries with the highest IQ scores in Europe were Italy, Germany and Austria. Due to cumulative exposures from water fluoridation and the consumption of tea in Ireland, it is obvious that dietary fluoride intake in mainland Europe is significantly lower than the Republic of Ireland. For example, in 2003, per capita consumption of tea in Italy, Germany, Austria was 0.1, 0.29, 0.2 kg per person respectively, compared to 3.43 kg per person in the Republic of Ireland. Whether fluoride intake and cumulative exposures are contributing to measurable long-term differences in children's cognitive outcomes in Ireland remains uncertain, but given that the difference in mean IQ between Ireland, Italy, Germany and Austria was in the order of 15 IQ points, this suggests that the burden of cumulative fluoride exposures and toxicity may be directly and permanently affecting intellectual and neurobehavioral development in Irish children. Given the ongoing international policy debate on water fluoridation and mounting evidence that fluoride is a developmental neurotoxin this is a topic of major public health significance. In the meantime, no research has been conducted in Ireland to assess the relationship between biomarkers of exposure to fluoride and cognitive health.

In ending, as noted in previous correspondence by Mr Waugh of 11th May 2016, no economic evaluation or cost benefit analysis of community water fluoridation has ever been conducted in Ireland. Considering the recent findings of Ko and Thiessen (2014) - *A critique of recent economic evaluations of community water fluoridation*³²; Irish Water were requested in May 2016 to provide a cost benefit analysis of water fluoridation in Ireland. The following points were requested to be included in the analysis. A comprehensive breakdown and assessment of the economic costs for provision of building infrastructure; equipment costs, installation costs; monitoring and surveillance; health and safety infrastructure costs; chemical costs; maintenance and auditing costs; plant and equipment replacement costs; insurance costs including possible injury litigation costs for workers as well as pollution incidences and public liability costs associated with the storage and use of hazardous chemicals used for fluoridation of drinking water supplies. Moreover, in light of current evidence of potential harm posed by water fluoridation, the cost benefit analysis was requested to include likely costs associated with the potential contribution of water fluoridation to neurological disorders in children (cognitive impairment and behavioural disorders such as ADHD), as well as wider health disorders associated with fluoride intoxication including chronic musculoskeletal disorders, chronic pain, chronic kidney disorders and endocrine dysfunction. As with the additional requests for information no reply or acknowledgement was forthcoming from Irish Water. Clearly, such an analysis along with population exposure data is of the greatest public relevance and should be conducted before any more taxpayer's money is spent on promoting and reinforcing water fluoridation in Ireland.

We the undersigned look forward to your reply.

Mr. Declan Waugh BSc. CEnv. MCIWEM. MIEMA
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³⁰ Lynn,R.,Vanhanen,T. 2002. IQ and the Wealth of Nations. Praeger, Westport, CT.

³¹ Lynn, R., Vanhanen,T. 2006.IQ & Global Inequality. Washington Summit Publisher, Augusta, GA.

³² Ko L, Thiessen KM. A critique of recent economic evaluations of community water fluoridation. Int J Occup Environ Health. 2015;21(2):91-120. doi: 10.1179/2049396714Y.0000000093.

CO-SIGNATORIES TO THIS LETTER INCLUDE THE FOLLOWING INDIVIDUALS. ALL NAMED PERSONS HAVE READ AND RECEIVED A COPY OF THIS LETTER AND HAVE AUTHORIZED MR WAUGH TO USE THEIR NAME FOR THE PURPOSES OF THIS COMMUNICATION AS CO-SIGNATURES TO THIS CORRESPONDENCE. NOTE: ALL SIGNATURES WERE OBTAINED BETWEEN DECEMBER 1ST AND 17TH DECEMBER INCLUSIVE. ADDRESSES OF CERTAIN PUBLIC FIGURES OR RECORDING ARTISTS ARE WITHHELD ON PRIVACY GROUNDS.

ALL CORRESPONDENCE IN REPLY TO THIS COMMUNICATION IS TO BE FORWARDED TO MR. DECLAN WAUGH, ON BEHALF OF ALL SIGNATURES TO THIS LETTER.

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