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February 7, 2022

Rick Woychik, Ph.D.
Director
National Toxicology Program and the
National Institute of Environmental Health Sciences
111 TW Alexander Drive
Durham, NC 27709

Re: State-of-the-Science Report on Fluoride Exposure

Dear Dr. Woychik:

On behalf of our 162,000 members, we would like to express our concern about the National Toxicology Program's forthcoming state-of-the-science report examining whether there is a causal relationship between fluoride exposure and potential neurodevelopmental and cognitive effects. Specifically, we ask you to exclude—or carefully consider how to characterize—any neurotoxin claims lingering from NTP's now-abandoned monograph, even if placed in a forward or executive summary.

For the last several years, NTP has been examining the literature to determine whether there is a causal relationship between fluoride exposure and neurocognitive health. The work culminated in a proposed monograph titled Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects. Both the first and revised drafts contained the unqualified statement that fluoride is a "potential" neurotoxin *at any exposure level*.[1-2]

The National Academies of Sciences, Engineering and Medicine issued scathing peer reviews of both drafts, questioning whether the claim could withstand scientific scrutiny. NASEM noted that NTP failed to provide adequate scientific evidence for its conclusion, noting difficulty following the review methods, inability to find key data, "worrisome" inconsistencies, and concerns about the wording of some conclusions.[3-4]

NTP's blanket claim about *any level of exposure* was based on a "low-to-moderate level of evidence" examining exposure to abnormally high levels of fluoride (≥1.5 mg/L). Those levels are more than double of what Centers for Disease Control and Prevention and the U.S. Public Health Service recommends for community water fluoridation (0.7 mg/L). It prompted NASEM to write in its second peer review:

> "NTP did not conduct a formal dose-response assessment that could inform a discussion on water fluoridation. NTP needs to state clearly that the monograph is not designed to be informative with respect to decisions about the concentrations of fluoride that are used for water fluoridation. That point should be reiterated at the end of the monograph with some indication that…[the monograph] does not draw any conclusions regarding drinking-water fluoridation or other fluoride sources, such as toothpaste or other dental treatments… [T]he context into which the monograph falls calls for much more carefully developed and articulated communication on this issue."

The ADA is concerned that the monograph's risk biased claim about fluoride being a "potential" neurotoxin *at any exposure level* will resurface in NTP's state-of-the-science report. An unqualified claim of this nature would only add to the many myths and misperceptions about community water fluoridation (0.7 mg/L)—and undermine national, state, and local efforts to expand the practice.

The CDC hailed community water fluoridation as one of ten great public health achievements of the 20th century.[5-6] It is an inexpensive way to reduce tooth decay by at least 25 percent in the population.[7] It would be a shame to distract from over 75 years of public health success over a simple matter of communicating the science, which is often more nuanced than a sound bite can convey.

We would welcome the opportunity to meet with you to discuss our concerns. In the meantime, we ask you to exclude—or carefully consider how to characterize—any neurotoxin claims lingering from NTP's now-abandoned monograph, even if placed in a forward or executive summary.

If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

Cesar R. Sabates, D.D.S.
President

/s/

Raymond A. Cohlmia, D.D.S.
Executive Director

CRS:RAC:rjb

cc: ADM Rachel Levine, Assistant Secretary for Health

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[1] National Toxicology Program. 2019. Draft NTP Monograph on the Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects. Office of Health Assessment and Translation, Division of the NTP, National Institute of Environmental Health Sciences, National Institutes of Health, U.S. Department of Health and Human Services.

[2] National Toxicology Program. 2020. Revised Draft NTP Monograph on the Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects. Office of Health Assessment and Translation, Division of the NTP, National Institute of Environmental Health Sciences, National Institutes of Health, U.S. Department of Health and Human Services.

[3] National Academies of Sciences, Engineering, and Medicine. 2020. *Review of the Draft NTP Monograph: Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects*. Washington, DC: The National Academies Press.

[4] National Academies of Sciences, Engineering, and Medicine. 2021. *Review of the Revised NTP Monograph on the Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects*: A Letter Report. Washington, DC: The National Academies Press.

[5] Centers for Disease Control and Prevention. Ten Great Public Health Achievements -- United States, 1900-1999. MMWR 1999; 48 (12): 241-243.

[6] Vivek H. Murthy, Surgeon General's Perspectives: Community Water Fluoridation—One of CDC's 10 Great Public Health Achievements of the 20th Century, *Public Health Rep* 2015; 130(4): 296-298.

[7] American Dental Association, *Fluoridation Facts*, 2018.