

STATEMENT ABOUT WATER FLUORIDATION FROM THE EPA PROFESSIONALS UNION **NTEU CHAPTER 280 - U.S. ENVIRONMENTAL PROTECTION AGENCY**

Chapter 280 of the National Treasury Employees Union (NTEU) represents professional employees at the headquarters offices of the U.S. Environmental Protection Agency. Scientists, lawyers, engineers, economists and other workers defined by Congress as "professionals" voted in 1984 to be represented by the union.

A STATEMENT OF CONCERN ON FLUORIDATION

Understanding and appreciating the historical reasons for advocating fluoridation, the undersigned professionals now recognize valid concerns about its safety and about its impact on the environment. This Statement serves as a vehicle for expressing these concerns. However, it is not a position statement on fluoridation, nor does it commit the undersigned to any point of view other than what is stated clearly in this document. A brief summary of recent events, reports, and research underlying our concerns, as well as a list of references, are supplementary to this document. (Link to footnotes in this article.)

OUR MAJOR CONCERNS:

I. Environmental Concerns

Silicofluorides: unrefined industrial waste

91% of Americans ingesting artificially fluoridated water are consuming silicofluorides¹. This is a class of fluoridation chemicals that includes hydrofluosilicic acid and its salt form, sodium fluorosilicate. These chemicals are collected from the pollution scrubbers of the phosphate fertilizer industry. **The scrubber liquors contain contaminants such as arsenic, lead, cadmium, mercury, and radioactive particles², are legally regulated as toxic waste, and are prohibited from direct dispersal into the environment. Upon being sold (unrefined) to municipalities as fluoridating agents, these same substances are then considered a "product", allowing them to be dispensed through fluoridated municipal water systems to the very same ecosystems to which they could not be released directly.** Sodium fluoride, used in the remaining municipalities, is also an industrial waste product that contains hazardous contaminants.

Scarcity of environmental impact studies

This is of deep concern to us. Studies that do exist indicate damage to salmon and to plant ecosystems.^{3a} It is significant that Canada's water quality guideline to protect freshwater life is 0.12 ppm (parts per million). ^{3b}

99.97% of fluoridated water is released directly into the environment at around 1ppm

This water is NOT used for drinking or cooking.⁴

II. Health Concerns

Absence of safety studies on silicofluorides

When asked by the U.S. House Committee on Science for chronic toxicity test data on sodium fluorosilicate and hydrofluosilicic acid, Charles Fox of the EPA answered on June 23, 1999, "EPA was not able to identify chronic toxicity data on these chemicals". ⁵ Further, EPA's National Risk Management Research Laboratory stated, on April 25, 2002, that the chemistry of silicofluorides is "not well understood" and studies are needed.

EPA health goals ignored

The EPA defines the Maximum Contaminant Level Goal (MCLG) for toxic elements in drinking water thus: "the level below which there are no known or anticipated effects to health." **The MCLG for arsenic, lead, and radioactive particles, all contaminants of the scrubber liquors used for fluoridation, is 0.0 ppb (zero parts per billion). Therefore, any addition of fluorine-bearing substances to drinking water that include these contaminants is contrary to the intent of EPA's established health goals.**

Increased blood lead levels in children

Two recent studies with a combined sampling of over 400,000 children found significantly increased levels of lead in children's blood when silicofluorides from the phosphate fertilizer industry were used as the fluoridating agent.⁶ This shows that there is a significant difference in health effects even between different fluoridation compounds.

Ingestion of fluoride linked to many health effects

Contrary to assertions that the health effects of fluoride ingestion already have been scientifically proven to be safe and that there is no credible scientific concern, over the last fifteen years the ingestion of fluoride has been

linked in scientific peer-reviewed literature to neurotoxicity⁷, bone pathology⁸, reproductive effects⁹, interference with the pineal gland¹⁰, gene mutations¹¹, thyroid pathology¹², and the increasing incidence and severity of dental fluorosis¹³. This has caused professionals who once championed the uses of fluoride in preventing tooth decay, to reverse their position and call for a halt in further exposures.¹⁴ It is of significance that 14 Nobel Prize winning scientists, including the 2000 Nobel Laureate in Medicine, Arvid Carlsson, have expressed reservations on, or outright opposition to, fluoridation.¹⁵

[] FDA has never approved systemic use of fluoride**

The U.S. Food and Drug Administration in December 2000 stated to the U.S. House Committee on Science they have never provided any specific approval for safety or effectiveness for any fluoride substance intended to be ingested for the purpose of reducing tooth decay.¹⁶

Total fluoride exposure of growing concern

Total fluoride exposure from all sources, including food, water, and air, is of growing concern within the scientific community.¹⁷ As evidenced in the U.S. Public Health Service ATSDR 1993 report which was referenced in correspondence between the U.S. House Committee on Science and Charles Fox of the U.S. EPA, **large subsets of the population, including the elderly, children, and pregnant women, may be unusually susceptible to the toxic effects of fluoride.**¹⁸

Centers for Disease Control concession

The CDC now concedes that the systemic value of ingesting fluoride is minimal, as fluoride's oral health benefits are predominantly topical¹⁹, and that there has been a generalized increase in dental fluorosis²⁰.

III. In Consideration of the concerns raised above, we urge fluoridated cities, states with mandatory fluoridation, health care professionals, and public health authorities, to review ALL current information available, and use this information to re-evaluate current practices.

IV. Congressional Investigation is Appropriate

This Statement of Concern (same substance, slightly different content and form), along with a significant list of signatures, was unveiled at the May 6, 2003 EPA Science Forum session on fluoridation in support of the National Treasury Employees Union Chapter 280 (EPA union of professionals) renewed call for a Congressional investigation. No authorities from government agencies or non-governmental organizations responded to widespread EPA invitations over a six-week period, to attend this session to explain/defend the practice of fluoridation. In view of this fact, and also that some serious questions of propriety have been posed but not addressed, about the formulation of the EPA's drinking water standards for fluoride²¹, as well as the downgrading of cancer bioassay data by the EPA in 1990²², it now seems especially valid to ask Congress to hold hearings that will compel promoters to answer many unanswered questions.

It is appropriate that the U.S. Congress undertake an in-depth investigation of this public policy that is endorsed by major U.S. government agencies, but has never been adequately reviewed in its long history. **Considering that there is an absence of research on silicofluorides, and that the latest scientific research on toxicity of fluorides has never been included in any government policy-making, and considering the many unanswered questions and concerns, we join the USEPA Union of professional employees in calling for a full-scale Congressional investigation into the public policy of fluoridation.**

<http://www.nteu280.org/Issues/Fluoride/flouridestatement.htm>

ALSO SEE "WHY EPA HEADQUARTERS UNION OF SCIENTISTS OPPOSES FLUORIDATION."

This tells more of the EPA union's specific scientifically-based health and environmental concerns; its history of trying to bring up concerns within the government; and its decision, when finding them still unaddressed, to go public and to the courts to ask for proper action. It ends with this paragraph:

"The implication for the general public of these calculations is clear. **Recent, peer-reviewed toxicity data, when applied to EPA's standard method for controlling risks from toxic chemicals, require an immediate halt to the use of the nation's drinking water reservoirs as disposal sites for the toxic waste of the phosphate fertilizer industry**²⁴."

SOURCE: <http://www.nteu280.org/Issues/Fluoride/NTEU280-Fluoride.htm>

NOTE: Internal bolding and underlines of text added by Patricia Dines to highlight key points.