
From: Stuart Cooper
Sent: 3/8/2024 12:13:53 PM
To: DOH WSBOH
Cc:
Subject: Public Comment - Fluoridation Petition



attachments\7605F4B7B7C3499D_word - Letter to WA BOH.docx

External Email

Please see my public comment attached in the word document.

Thank you,

Stuart Cooper
Executive Director
Fluoride Action Network



From: John Mueller
Sent: 3/8/2024 12:07:57 PM
To: DOH WSBOH
Cc:
Subject: My Public Comments



attachments\6C7FF512628C4B63_30427CA8A0374B29BF1125260FD59D80.jpg

External Email

Please consider the hazardous work conditions and equipment maintenance expenses with the operation of a water fluoridation program. Fluorosilicic acid is highly corrosive, with vapors combining with ambient air moisture to form hydrofluoric acid. The attached photo shows the corrosive effects on safety equipment in a fluorosilicic acid storage room at a large municipal treatment plant. Obviously the equipment in the photo needed frequent and regular maintenance.

Sent from Mail

<[https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%2F)
for Windows

Submission to WA Board of Health

The State Board of Health Ought to Act to Protect Residents From the Unnecessary Risks Posed By Water Fluoridation

Dear Members of the State Board of Health:

I'm urging the State Board of Health to respond appropriately to the CDC's data showing that millions of U.S. residents have visible signs of overexposure to fluoride, as well as government-funded research linking fluoride in water to impaired brain development in children.

The CDC's National Health and Nutrition Examination Survey (NHANES) has consistently found skyrocketing rates of dental fluorosis. The agency reported that [41%](#) of adolescents (12 to 15) had dental fluorosis in 2004, an increase of over 400% from the rates found 60 years prior. The CDC's 2012 survey found that the rate jumped significantly to [65+% of adolescents with dental fluorosis](#). Now, according to a recent study ([Yang, June 2021](#)) published in the journal Ecotoxicology and Environmental Safety using the data from the NHANES 2015-16 survey, the "prevalence of dental fluorosis was 70% in U.S. children."

Dental fluorosis is a permanent tooth enamel defect caused by excessive fluoride intake during childhood. It appears as white spots or lines in milder cases and pitted and stained enamel in more severe cases, weakening the teeth and resulting in increased decay. More importantly, fluorosis is a biomarker of overexposure to fluoride during childhood development.

Ingesting fluoridated water, particularly in reconstituted infant formula, and processed foods made with fluoridated water are recognized as the primary sources of exposure, though swallowing toothpaste and fluoride prescriptions also contribute.

The teeth of millions of children, teens, and adults have already been permanently damaged by overexposure to fluoride during their first 8 years of life, and the CDC, along with the other promoters of fluoridation, are fully aware. And yet, the public health officials have not only failed to warn consumers about this side-effect, but have continued to push for the expansion of the practice in Washington, with a recent attempt to

initiate fluoridation in Spokane and throughout the state with legislation that fortunately failed in 2022.

Teeth are obviously not the only tissues in the body that are harmed by, or accumulate, fluoride. The CDC's NHANES data has been used in recent published peer-reviewed studies to link fluoridated water with a number of additional side effects, including earlier [onset of menstruation](#) for black teens, [sleep disorders](#) in adolescents, [increased uric acid levels](#) in the blood, 2.5 times greater risk of [pediatric fractures](#), and [kidney and liver impairment](#) in adolescents.

Additional studies on fluoridation have also recently found [higher rates of hip fractures](#), disruption of the [endocrine system](#), and increased rates of [hypothyroidism](#).

There is also now a large body of government-funded studies linking early life exposure to [neurotoxicity](#), including [during infancy](#). The Board of health must take action to warn both pregnant women and parents of formula-fed infants about the recent NIH-sponsored research indicating that fluoride in drinking water poses a risk to the developing brain at the exposure levels experienced in fluoridated communities, both in utero and during early infancy. The lack of appropriate action to protect children by our federal agencies like the CDC and HHS is an alarming disregard for science and disrespect for the welfare of U.S. citizens, but that doesn't mean that the Washington Board of Health must also fail to act. Our federal agencies leave fluoridation decisions up to state and local policymakers. This includes you. You're in a position to act and ought to.

It has now been six years since the first high quality US-government funded study ([Bashash et al., 2017](#)) found an association between fetal exposure to fluoride and lowered IQ, five years since a government-funded study found an increase in ADHD symptoms associated with in utero exposure to fluoride ([Bashash et al., 2018](#)), four years since the findings in Bashash's study were repeated by another US-government funded study ([Green et al., 2019](#)), and 3 years since a third US-government-funded study ([Till et al., 2020](#)) found that bottle-fed infants in fluoridated communities in Canada had a significantly lowered IQ compared to bottle-fed infants in non-fluoridated communities.

You should also be made aware of the following:

- A study from Canada published last summer in the journal *Nutrients* found that pregnant women who had low iodine levels and elevated fluoride had boys who suffered an average IQ loss of 9.3 IQ points [[Goodman 2022](#)]. Artificially fluoridated drinking water was the main source of the fluoride. To put this huge 9-point IQ loss from fluoride into perspective, studies show that a pregnant woman smoking 20+ cigarettes each and every day during their pregnancy can cause less of an IQ loss for the child than fluoride, averaging [about 6.2-points lost](#).
- Experts in environmental toxins, including the former Director of the National Toxicology Program, Dr. Linda Birnbaum, [published an op-ed](#) calling for policy makers to look at the science and take action to protect pregnant women and their children.
- Famed Harvard researcher Phillippe Grandjean, known for helping warn the world about the effects of arsenic, mercury, and PFOAs, conducted the first benchmark dose analysis in 2020 on maternal fluoride exposure and neurotoxicity to the fetus, which was published in the journal *Risk Analysis* ([Grandjean, 2021](#)). Benchmark dose analyses are used by the Environmental Protection Agency (EPA) and toxicologists to determine at what level a substance starts to cause harm. The analysis confirmed that extremely low fluoride exposure during pregnancy impairs fetal brain development, finding that a maternal urine fluoride concentration of only 0.2mg/L — which coincides with the level in the water (0.2ppm) — was enough to lower IQ by at least 1 point.

This is 3.5 times lower than the current government “recommended” level of 0.7ppm in fluoridated communities. For perspective, a urinary fluoride (UF) concentration of 0.2mg/L is far below what a pregnant woman in a fluoridated community would have, as confirmed by two recent studies.

The authors of the benchmark dose analysis stated: “These findings suggest that fetal brain development is highly vulnerable to fluoride exposure ... and provide additional evidence that fluoride is a developmental neurotoxicant (i.e., causing adverse effects on brain development in early life). Given the ubiquity of fluoride exposure, the population impact of adverse effects from fluoride may be even greater than for other toxic elements like lead, mercury, and arsenic ... and the benchmark results should inspire a revision of water fluoride recommendations aimed at protecting pregnant women and young children.”

- After conducting a 7-year systematic review of fluoride’s neurotoxicity, the National Toxicology Program reported that 52 of 55 fluoride brain studies found decreases in child IQ associated with an increase in fluoride, a remarkable 95% consistency. Of the 19 studies rated higher quality, 18 found a lowering of IQ. The meta-analysis could not detect any safe exposure, including at levels common from drinking artificially fluoridated water.

The NTP’s report says: “Our meta-analysis confirms results of previous meta-analyses and extends them by including newer, more precise studies with individual-level exposure measures. The data support a consistent inverse association between fluoride exposure and children’s IQ.”

Meanwhile, more and more studies are being published on this issue around the world. See the [list of 23 human studies](#) that have been published in the four years since the Bashash, 2017 study was published. which have found a lowering of IQ associated with fluoride exposure at modest levels and in the case of the US-government funded studies at the levels experienced in artificially fluoridated communities.

It is an embarrassment for the USA to be perceived by the rest of the world as being willing to risk our children’s brains for anything, let alone a highly questionable benefit to their teeth that could easily be replaced with alternative oral health strategies. The longer you delay, the more citizens will be harmed.

Sincerely,

Stuart Cooper
Executive Director
Fluoride Action Network

www.FluorideAlert.org