

Minister of State Deputy Róisín Shortall T.D.

CC: Department of Taoiseach
Minister for Health
Minister For Agriculture, Food and Fisheries
Minister for Environment, Community and Local Government
Minister for Justice, Equality and Defence
Deputy Dessie Ellis T.D.
Deputy Emmet Stagg T.D.

23rd March 2012

Response to Parliamentary Question 681 and 706 dated 21st March 2012

Dear Minister,

I note your response to parliamentary questions by Deputy Ellis's T.D., (ref:681/706) and further to my correspondence of 21st March in respect of parliamentary question (ref: 14533/12) by Deputy Stagg T.D., regarding my report on the *Human Toxicity, Environmental impact and Legal Implications of Water Fluoridation*.

I respectfully advise the Minister that in quantifying the potential public health risk from fluoridation of drinking water, in excess of fifty comprehensive epidemiological, toxicological, clinical medicine, and environmental exposure assessments were identified by the U.S. National Research Council (NRC) and the European Commission's Scientific Committee on Health and Environmental Risks (SCHER). The undertaking of these studies is regarded as of paramount importance for the protection of public health in communities where water fluoridation is practised, the details of which have been examined in my report.

In response to the parliamentary question by Deputy Ellis T.D., the Minister has confirmed the findings of my report, which are that the Department of Health has no information on the mutagenic, teratogenic, developmental neurotoxicity, cytotoxicity, carcinogenic effects, cogenotoxicity, short-term and sub-chronic exposures or synergistic/antagonistic effects of fluoride or Hexafluorosilicic acid or silicofluoride compounds on human beings despite the numerous recommendations from scientific bodies that efforts be made to determine the toxicity of fluoride and silicofluoride products.

Furthermore, the Department of Health confirms that no human or animal health risk assessments have ever been completed on its behalf on silicofluorides and that the biological or toxicological impacts have never been fully examined by the Department. In addition, the Department of Health confirms that no studies have been undertaken examining the interactive co-toxicity public health risks associated with silicofluoride compounds when mixed with other water treatment chemicals such as aluminium compounds. As a consequence, despite the clear recommendations of international scientific bodies, the Government of Ireland through the Department of Health continues to use untested products without undertaking the necessary precautions to protect public health, consumers and the environment.

The Minister is to be advised that the dental epidemiological research studies noted in her response do not qualify in any scientific capacity as studies that examine or determine the overall human health and toxicological risks associated with the ingestion of silicofluoride compounds in drinking water.

These dental studies merely examine the prevalence of dental caries within society. In contrast, the latest studies by O Mullane et al.¹ (2003) Browne et al.² (2005) and Verkerk et al.³ (2010) find that the prevalence of dental fluorosis, representing chronic overexposure of the population to fluoride, has now reached endemic proportions in Ireland and that water fluoridation is the principle cause of the increased incidence. The Minister is advised that the study by O Mullane et al. identified that the prevalence of dental fluorosis in communities with no fluoridated water was as low as 1.5% compared to 37% in fluoridated communities. It was also documented that no children were observed with moderate or severe dental fluorosis in non-fluoridated communities.

For a better understanding of the international findings with respect to dental health worldwide the Minister is requested to review Chapter 9 of my report which highlights how the decline in dental caries prevalence has been reported in all non-fluoridated communities worldwide and that this has been identified as due to the use of fluoridated toothpaste and other factors such as nutrition and not the use of fluoridated water.

The Minister is also advised that the recommendations of the World Health Organisation⁴ and UNICEF Report on feeding and nutrition of infants⁵ noted that while there appears to be general consensus that an optimal fluoride intake should be secured through either water fluoridation, fluoride supplements or the use of fluoridated toothpaste, this recommendation is based on **one** of the above intake pathways **not both**. In other words, if you use fluoridated toothpaste you do not need fluoridated water. In other jurisdictions, parents are also advised not to use fluoridated water in the preparation of formula-feed for babies. It is accepted that in countries where alternative vehicles for fluoride such as fluoridated toothpaste are widely available *and* widely used, public authorities do not need to fluoridate drinking water.

In light of the information provided to you and your Department, and given that the Minister has determined that the Department of Health intends to

¹ O'Mullane DM, Harding M, Whleton HP, Cronin MS, Warren JJ. Dental Fluorosis in Primary Teeth of 5-year-olds in Ireland. Paper presentation at American Association for Dental Research conference, San Antonio, USA in March 2003.

² Browne D, Whelton H, O' Mullane D, Oral Health Services Research Centre, University Dental School, Cork. Fluoride metabolism and fluorosis, Journal of Dentistry, Volume 33 Issue 3, March 2005, Pages 177-186

³ Verkerk, Robert H.J. The paradox of overlapping micronutrient risks and benefits obligates risk/benefit analysis, Journal of Toxicology, Feb 2010.

⁴ Nutrients in Drinking Water, Water, Sanitation and Health Protection and the Human Environment World Health Organization, Geneva, 2005.

⁵ Unicef Report on Feeding and Nutrition, WHO regional publications European Series No 87.

continue with the policy of water fluoridation despite the clear lack of scientific data to demonstrate that it is safe; the Minister, in the interests of public safety and the most vulnerable in our society, is requested to reconsider this position. Failure to protect consumers and enforce EU law may result in legal action in an Irish or European Court for negligent conduct or actions or systemic negligence in addition to administrative, civil and criminal liabilities against Ministers who are responsible not only for the conduct of the Government but the functions of their Departments.

If the government is to continue with the policy of mandatory fluoridation of drinking water supplies, a thorough examination of the scientific recommendations requiring further study must be undertaken immediately demanding comprehensive and costly research, as outlined in my report. In the interim, it is clear that in the absence of any such data or completion of the required toxicological assessments a moratorium on water fluoridation must be put in place to protect consumers. It is simply unacceptable that the State would continue to allow untested chemicals to be added to public drinking water supplies.

Good governance demands that you respect the rights of consumers and citizens and parents to safeguard their personal health and protect their children's wellbeing. Good governance should enhance human rights as provided in the Charter for Fundamental Rights of the European Union, the EU Treaty of Europe and United Nations' Treaties mandating that all signatory states, which include the Government of Ireland, comply with the 'Precautionary Principle'. Failure to do so, in light of the findings in this report, would represent a gross failure of responsibility and political leadership.

The Minister is also advised that contrary to the Minister's statement, the majority of scientific organisations advising national governments worldwide have determined that the policy of water fluoridation is not safe. As it currently stands, the following western European countries have rejected water fluoridation: Austria, Belgium, Denmark, Finland, France, Germany, Iceland, Italy, Luxembourg, the Netherlands, Norway, Sweden, Spain, Portugal, Switzerland and the United Kingdom. In addition, most other non-EU countries similarly support this position including China, Japan, Czech Republic and many other nation states. There is only one other country in the world that supports Ireland's position on mandatory fluoridation of public water supplies. That country is Singapore.

Yours sincerely

Declan Waugh