



**Comments to the Environmental Protection Agency
Fluoride Human Health Toxicity Assessment
Docket ID: EPA-HQ-OW-2025-3823**

The National Consumers League (NCL) is America’s oldest consumer advocacy organization, dedicated to advancing consumer protections in healthcare, food safety, child labor, and privacy. NCL advocates for policies that expand access to more affordable healthcare and preventive health measures, including those that support oral health such as community water fluoridation, which remains one of the most effective tools for preventing tooth decay. We recognize that EPA’s human health toxicity assessment is focused on evaluating potential risks and does not consider the health benefits of fluoride within its scope. At the same time, **given the well-established role of community water fluoridation in preventing dental disease, it is critical that any assessment of potential risks be grounded in a comprehensive, objective, and evidence-based review of the highest-quality scientific literature.**

NCL has long supported drinking water fluoridation as a safe, effective and equitable public health intervention to decrease dental cavities in children and later in life oral health complications. Fluoridation of community drinking water, which began in 1945, was named by the Centers of Disease Control and Prevention as one of the ten greatest public health achievements of the 20th century.¹ Since then, there has been robust scientific and real-world evidence showing positive impacts of fluoridated drinking water, with studies demonstrating that water fluoridation reduces dental decay by at least 25% in children and adults.²

Preventing dental disease, such as through water fluoridation and twice-yearly visits to the dentist, is the most effective way to protect children’s oral health and avoid unnecessary costs. When preventive care is not accessible, cavities develop and treatment often requires fillings and other restorative services that can cost hundreds of dollars per tooth - expenses that are unaffordable for many families. Recent cuts to Medicaid and high insurance premiums place essential dental care even further out of reach for families who already face significant barriers to accessing care, while also contributing to higher levels of medical debt, as dental bills are a known driver of unpaid healthcare expenses. Poor oral health in childhood can have lasting consequences, including pain, missed school days, impaired nutrition, and increased risk of chronic health conditions later in life, underscoring the importance of maintaining community water fluoridation programs.

¹ [Ten Great Public Health Activities -- United States, 1900-1999 | CDC](#)

² [Fluoridation FAQs | American Dental Association](#)

In addition, fluoride in water at the U.S. Public Health Service's recommended level of 0.7 mg/L is not toxic according to the best available scientific evidence. At this concentration, acute fluoride toxicity is effectively impossible to occur solely from ingesting fluoridated drinking water, as one would have to drink over five liters of water per kilogram of body weight.³

Given Secretary Kennedy's misleading comments calling fluoride "industrial waste" and stating the Administration's goals are to remove it from public water entirely,⁴ NCL has significant concerns that the Administration has prejudged the health risks of fluoride and EPA's assessment will not be based on a comprehensive review of high-quality literature. NCL is concerned that a significant adjustment in EPA's standards would be used to justify lowering fluoride to non-preventative levels. This raises significant concerns about future harms to the health and safety of America's children.

As the EPA proceeds with the next steps of the assessment, we urge the Agency to use objective and evidence-based processes which include reviewing the entirety of the latest peer-reviewed, valid and reproducible research to reach an objective conclusion on the health risks of fluoride in drinking water, including on childhood brain development. Should EPA not include such research, not only would the health assessment and its findings be fundamentally flawed, but it would also contradict the President's call for use of gold standard science.⁵

NCL remains committed to ensuring that consumers across America have trust and confidence in public health institutions, and that policies that impact preventive health measures such as fluoridated community drinking water are grounded in the best available science.

Sincerely,

Lisa Bercu
Senior Director of Health Policy

Samatha Sears
Senior Manager of Health Policy

³ [Fluoridation FAQs | ADA](#)

⁴ [Robert F. Kennedy Jr X post | X](#)

⁵ [Restoring Gold Standard Science | White House](#)