

February 23, 2026

Office of Ground Water and Drinking Water Docket
Attention Docket ID No. EPA-HQ-OW-2025-3823

To Whom It May Concern:

On behalf of the 4,700 members of the Pennsylvania Dental Association, I am writing to provide comments on the US Environmental Protection Agency's (EPA) scientific evaluation of potential health risks of fluoride in drinking water.

EPA's review of scientific information regarding the safety of fluoride in drinking water must be consistent with Gold Standard Science, which incorporates the agency's peer-reviewed methods, as per its mission. We urge EPA to enlist the National Academies of Sciences, Engineering, and Medicine (NASEM) to peer review its assessment plan and systematic review prior to finalization.

NASEM is considered the gold standard for peer review, and a peer review by NASEM helps ensure future regulatory decisions regarding community water fluoridation are based on high-quality evidence that is both reproducible and objective. If EPA wants to promote the best available, unbiased, peer-reviewed studies through broad literature searches in scientific databases, it must remove the biased studies included in this review and add the numerous, better-conducted studies from the last few years.

EPA's latest toxicity assessment must gather feedback from researchers who are well-established and trusted within the scientific community as water fluoridation experts and those producing studies that stand up to peer review and replication. Any studies from non-peer reviewed outlets, not backed by the overwhelming majority within the scientific community should be excluded.

We also advocate for providing access to independent peer reviewers and recommend excluding the NTP Monograph on Fluoride and Neurocognition, which clearly states it does not apply to water fluoridation at 0.7 mg/L, as practiced in both the US and Canada. The NTP report only found an association, not causation, with fluoride levels higher than 1.5mg/L - which occurs naturally in countries such as China and India.

In addition, the NTP clearly states that their findings should not be used to develop a dose-response analysis- which is exactly what EPA has stated it plans to do.

The scientific weight of sound evidence around the benefit of community water fluoridation is clear and compelling. Given the nature of this issue, we again urge EPA to enlist NASEM to peer review its assessment plan and systematic review prior to finalization.

Thank you for the opportunity to comment.

Sincerely,

Theodore J. Rockwell, DMD
PDA President