



DEC 21 2000

The Honorable Ken Calvert  
Chairman  
Subcommittee on Energy and Environment  
Committee on Science  
House of Representatives  
Washington, D.C. 20515-6301

Dear Mr. Chairman:

Thank you for the letter of May 8, 2000, to Dr. Jane E. Henney, Commissioner of Food and Drugs, regarding the use of fluoride in drinking water and drug products. We apologize for the delay in responding to you.

We have restated each of your questions, followed by our response.

- 1. If health claims are made for fluoride-containing products (e.g. that they reduce dental caries incidence or reduce pathology from osteoporosis), do such claims mandate that the fluoride-containing product be considered a drug, and thus subject the product to applicable regulatory controls?**

Fluoride, when used in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or animal, is a drug that is subject to Food and Drug Administration (FDA) regulation. FDA published a final rule on October 6, 1995, for anticaries drug products for over-the-counter (OTC) human use (copy enclosed). This rule establishes the conditions under which OTC anticaries drug products are generally recognized as safe and effective and not misbranded. The rule has provisions for active ingredients, packaging conditions, labeling, and testing procedures that are required by manufacturers in order to market anticaries products. A new drug application (NDA) may be filed for a product containing fluoride that does not meet the provisions stated in the final rule. As you know, the Environmental Protection Agency regulates fluoride in the water supply.

- 2. Are there any New Drug Applications (NDA) on file, that have been approved, or that have been rejected, that involve a fluoride-containing product (including fluoride-containing vitamin products) intended for ingestion with the stated aim of reducing dental caries? If any such NDA's have been rejected, on what grounds were they rejected? If any such NDA have been approved, please provide the data on safety and efficacy that FDA found persuasive.**

No NDAs have been approved or rejected for fluoride drugs meant for ingestion. Several NDAs have been approved for fluoride topical products such as dentifrices and gels. Fluoride products in the form of liquid and tablets meant for ingestion were in use prior to enactment of the Kefauver-Harris Amendments (Drug Amendments of 1962) to the Food, Drug, and Cosmetic Act in which efficacy became a requirement, in addition to safety, for drugs marketed in the United States (U.S.). Drugs in use prior to 1962 are being reviewed under a process known as the drug efficacy study implementation (DESI). The DESI review of fluoride-containing products has not been completed.

- 3. Does FDA consider dental fluorosis a sign of over exposure to fluoride?**

Dental fluorosis is indicative of greater than optimal ingestion of fluoride. In 1988, the U.S. Surgeon General reported that dental fluorosis, while not a desirable condition, should be considered a cosmetic effect rather than an adverse health effect. Surgeon General M. Joycelyn Elders reaffirmed this position in 1994.

- 4. Does FDA have any action-level or other regulatory restriction or policy statement on fluoride exposure aimed at minimizing chronic toxicity in adults or children?**

The monograph for OTC anticaries drug products sets acceptable concentrations for fluoride dentifrices, gels and rinses (all for topical use only). This monograph also describes the acceptable dosing regimens and labeling including warnings and directions for use. FDA's principal safety concern regarding fluoride in OTC drugs is the incidence of fluorosis in

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children. Children under two years of age do not have control of their swallowing reflex and do not have the skills to expectorate toothpaste properly. Young children are most susceptible to mild fluorosis as a result of improper use and swallowing of a fluoride toothpaste. These concerns are addressed in the monograph by mandating maximum concentrations, labeling that specifies directions for use and age restrictions, and package size limits.

Thanks again for contacting us concerning this matter. If you have further questions, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda K. Plaisier". The signature is fluid and cursive, with a prominent initial "M".

Melinda K. Plaisier  
Associate Commissioner  
for Legislation

Enclosure

"Final Rule/Federal Register - October 6, 1995  
Over-the-Counter Anticaries Drug Products"

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