JUSTIFICATION FOR SEMINAR ON THE POSSIBLE
MUTAGENIC/ONCOGENIC EFFECTS OF SODIUM FLUORIDE

Dear Mr. Cook,

At our meeting of December 31, 1985, you indicated you might be persuaded to hold a seminar on the mutagenic/oncogenic effects of sodium fluoride if we could show significant errors/omissions in the support document for the RMCL for fluoride in drinking water. The attached information (summarized below) should suffice to raise enough questions about the support document that a reasonable person would conclude that the issues need to be reexamined.

Errors/Omissions in Health Effects Support Document on Mutagenicity and Oncogenicity

(1) The support document found 4 papers in the literature on the mutagenicity of fluoride while ignoring 21 articles that appear to support the position that fluoride is a mutagen.

(2) The support document ignored significant reports that appear to support the position that fluoride can cause cancer and enhance tumor growth.

(3) The support document criticizes an epidemiology study suggesting that fluoridation of drinking water supplies is responsible for 10,000 to 20,000 excess cancer deaths every year in the U.S. The reports used to justify the criticism do not even relate to the study in question.

(4) the support document failed to mention (and its authors are probably unaware) that major critics of the epidemiology study mentioned above have reversed themselves under oath in a number of recent court cases.
While we have only focused on mutagenicity and carcinogenicity, there are similar kinds of mistakes/omissions on teratogenicity, hypersensitivity, reproductive effects, kidneys, thyroid, immune system, teeth, bone, and enzymes. There are inaccuracies as well in fluoride intake, sources of fluoride and dose conversions. For the time being, however, we are concerned that the literature on mutagenicity and carcinogenicity be presented in an open forum where the facts can be ascertained and the appropriate conclusions drawn.

We would like to negotiate the format for the seminar. While the details need to be worked out, it seems imperative that the seminar include a mutually agreed upon panel of experts to evaluate the presentation. This would enable a concrete and binding conclusion to be drawn and actions taken as a result of these conclusions.

We look forward to hearing from you.

Sincerely,

Robert J. Carton, Ph. D.
President-Elect
NFPE Local 2050
I. Articles on the mutagenic effects of fluoride that were not evaluated in the health effects support document.


II. Important articles showing that fluoride may cause cancer in animals and enhance tumor growth that were not evaluated.


III. An epidemiology study suggesting that fluoridation of drinking water supplies is responsible for 10,000 to 20,000 excess cancer deaths every year in the U.S. was rebutted with reports that mistakenly criticized an earlier study.

The study in question is cited in the health effects document as "Yiamouyiannis and Burke (1977)". Immediately following this citation, the report cites Oldham and Newell (1977) as a valid criticism of the Yiamouyiannis and Burke study. The Oldham and Newell study was, however, published one month before the Yiamouyiannis and Burke study and referred to their previous work published in 1975.

Strassburg and Greenland (1979) is also cited as a criticism. This work contained no reference to the Yiamouyiannis and Burke study of 1977.
IV. The report failed to mention that major critics of the epidemiology study of Yiamouyiannis and Burke have reversed themselves under oath in a number of court cases.

Sir Richard Doll agreed that fluoridated cities in the U.S. have higher cancer death rates than non-fluoridated cities. McColl vs Strathclyde Regional Council, Scottish High Court in Edinburgh (1981).

Professor David Newell admitted that his own study showed an absolute increase of 3.7 excess cancer death per 100,000 population in fluoridated areas vs. nonfluoridated areas. He also admitted that he was wrong when he suggested that the Yiamouyiannis and Burke study did not make the proper adjustments for age, race, and sex as is so often claimed. (ibid.)

Dr. Leo Kinlen admitted that his own study showed that the cancer incidence at sites he felt would most likely be affected by fluoridation were 5% higher in the fluoridated areas he examined than in the non-fluoridated areas. Paul W. Aitkenhead vs Borough of West View No. GD4585-78, Common Pleas of Allegheny County, Pennsylvania (1978).