



February 24, 2026

Dear EPA Administrator Zeldin:

The EPA's plans to review the literature on fluoride health effects must be consistent with Gold Standard Science that incorporates the agency's peer-reviewed methods as per its mission.

On behalf of the more than 23,000 voices of the American Student Dental Association (ASDA), I urge the EPA to have the National Academies of Sciences, Engineering, and Medicine (NASEM) peer review both its assessment plan and systemic review prior to finalization. NASEM is widely regarded as the gold standard for scientific peer review.

A peer review by NASEM will help ensure future regulatory decisions about community water fluoridation are based on reproducible, objective and high-quality evidence. If the EPA wishes 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 numerous, better-conducted studies from the last few years.

The collaboration with subject matter experts must exclude those who bring bias and erroneous research to the table. The 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. Please exclude those studies from non-peer reviewed outlets that are not backed by the overwhelming majority within the scientific community.

ASDA recommends excluding the NTP Monograph on Fluoride and Neurocognition which clearly states that it does not apply to water fluoridation at 0.7 mg/L as practiced in the US and Canada. The NTP report only found an association (not causation) with fluoride levels greater than 1.5 mg/L as occurs naturally in countries like China and India. Utilizing studies from countries with similar fluoride levels as the US should be prioritized under scrutiny of safety of fluoride. In addition, the NTP authors clearly state that the majority of studies on which they based their conclusions (three-fourths) were of low-quality and high risk of bias, and that their findings should not be used to develop a dose-response analysis- which is precisely what EPA has stated they plan to do.

Given the politicized nature of this issue, ASDA urges the EPA to enlist NASEM to peer review its assessment plan and systematic review prior to finalization.

Over 80 years of trusted science supports the safety and efficacy of community water fluoridation. It is important to consider the benefits and potential disadvantages of community water fluoridation. Prioritizing an unbiased and comprehensive review of fluoride will ensure states and municipalities have trusted science to guide their decisions.

A handwritten signature in black ink that reads "Honesty Boone". The script is fluid and cursive, with the first name "Honesty" and last name "Boone" clearly legible.

Honesty Boone
President, American Student Dental Association