

Pediatric Dentists, Children's Health Advocates Sound Alarm Over EPA's Inadequate Fluoride Assessment Plan

American Academy of Pediatric Dentistry warns that current methodology could erode decades of advancement in children's oral health and urges immediate reconsideration

CHICAGO, IL | February 27, 2026 – The American Academy of Pediatric Dentistry (AAPD), representing over 11,000 pediatric dental specialists, has formally submitted [comments](#) on the Environmental Protection Agency's (EPA) *Fluoride Preliminary Assessment Plan and Literature Survey* ([Docket No. EPA-HQ-OW-2025-3823](#)). The Academy warns that the EPA's current trajectory relies on discredited reports and inapplicable information that threatens safe community water fluoridation, triggering a public health crisis for American children. The AAPD is joined by 140 state and national organizations in its concern over the EPA plan and its repercussions.

In a comprehensive comment letter addressed to the EPA, the AAPD expressed "significant concerns" regarding the scientific integrity of the EPA's plan, arguing it fails to meet the Administration's own "Gold Standard Science" requirements.

Key Concerns Raised by the AAPD:

- **Misclassifying "Mild Fluorosis" as Toxicity Indicator:** The AAPD strongly objects to the EPA considering mild dental fluorosis – a purely cosmetic condition – as a "toxic" or "adverse" effect of safe water fluoridation. "Mild fluorosis has no deleterious or pathologic qualities," the letter states, noting that it often correlates with lower rates of tooth decay.
- **Reliance on a Flawed Report:** The Assessment Plan relies heavily on the 2024 National Toxicology Program (NTP) report despite its failed attempts at passing peer review with the National Academies of Sciences, Engineering, and Medicine (NASEM). The majority of the NTP report's underlying studies were not conducted in the U.S. and do not reflect U.S. community water fluoridation exposure levels. The NTP report authors cautioned against using the report to set a recommended fluoride dose, yet EPA relies on the report for its planned assessment.
- **Ignoring Health Benefits:** The EPA explicitly stated they would not consider health benefits of fluoride in its assessment. The AAPD strongly disagrees with this approach and states that deriving a toxicity review conducted in a vacuum without a cost-benefit analysis or risk-benefit analysis is "irresponsible." The Academy points to historical data in other countries showing that when communities intentionally remove fluoride from water, children experience increases in dental pain, infection, and missed school days.
- **Methodological Red Flags:** The AAPD highlighted several problematic shortcomings in the planned assessment, including an outdated literature search that excludes 2025 studies and the absence of a transparent, pre-specified systematic review protocol.

"If this assessment is not conducted with scientific integrity, children will experience more dental pain, infection, and lower quality of life" due to tooth decay, the nation's leading chronic childhood disease, the Academy stated. "The result of this deeply flawed plan points toward a de-fluoridation of water supplies that would undoubtedly lead to a surge in dental caries and healthcare costs."

A Call for Independent Review

The AAPD urges the EPA to pause its current process and engage an independent external reviewer—specifically the **National Academies of Sciences, Engineering, and Medicine (NASEM)**—to ensure a fair and scientifically sound assessment is conducted.

The Academy and its partners recognize optimally fluoridated drinking water as one of the most successful public health interventions in U.S. history. Our communities have benefited from safe and effective community water fluoridation for over 80 years, and it remains a cornerstone in preventing dental caries: the most common chronic disease among children. Together our organizations caution EPA and HHS from proceeding with the proposed plan, and we commit to continuing our work to protect and promote children's oral and overall health.

Concerned Partners

American Academy of Pediatric Dentistry
Academy of General Dentistry
Access Ready Inc.
Alaska Academy of Pediatric Dentistry
Alcan Dental Cooperative
American Academy of Oral & Maxillofacial Pathology
American Academy of Oral Medicine
American Academy of Orofacial Pain
American Academy of Pediatrics California Chapter 1
American Academy of Pediatrics, California Chapter 3
American Academy of Pediatrics, California Chapter 4
American Academy of Pediatrics, DC Chapter
American Academy of Periodontology
American Association for Dental, Oral, and Craniofacial Research
American Association of Endodontists
American Association of Orthodontists
American Association of Public Health Dentistry
American College of Prosthodontists
American Dental Association
American Dental Hygienists' Association
American Fluoridation Society, Inc.
American Institute on Disparities in Public Health
American Network of Oral Health Coalitions
American Public Health Association Oral Health Section
American Society of Dentist Anesthesiologists
American Student Dental Association
Arcora Foundation
Arizona Academy of Pediatric Dentistry
Arizona Dental Association
Arizona Oral Health Coalition
Arkansas Society of Pediatric Dentists
Arkansas State Dental Association
California Dental Association
California Pan-Ethnic Health Network
California School-Based Health Alliance
California Society of Pediatric Dentistry
Children Now
Children's Oral Health Network of Maine
Coalition of Texans with Disabilities
Colorado Academy of Pediatric Dentistry
Connecticut Oral Health Initiative
Connecticut Society of Pediatric Dentists
Connecticut State Dental Association
Delaware Academy of Pediatric Dentistry
Dental Trade Alliance
Elevate Oral Care
Florida Academy of Pediatric Dentistry
Florida Chapter of the American Academy of Pediatrics
Florida Dental Association
Foundation for Health Leadership and Innovation's North Carolina Oral Health Collaborative
Georgia Academy of Pediatric Dentistry
Gerontological Society of America
Hawaii Dental Association
Idaho Chapter of the American Academy of Pediatrics
Idaho State Dental Association
Illinois Chapter, American Academy of Pediatrics
Illinois Oral Health Coalition
Illinois Society of Pediatric Dentists
Indiana Dental Association
Indiana Oral Health Coalition
International Association of Paediatric Dentistry
Iowa Academy of Pediatric Dentistry
Iowa Dental Association
Justice in Aging
Kansas Chapter, American Academy of Pediatrics
Kentucky Academy of Pediatric Dentistry
Knox County Dental
Louisiana Academy of Pediatric Dentistry
Louisiana Dental Association
Maine Chapter, American Academy of Pediatrics
Maine Dental Association
Maine Primary Care Association
Maine Society of Pediatric Dentistry
Maryland Academy of Pediatric Dentistry
Maryland Dental Action Coalition
Maryland State Dental Association
Massachusetts Chapter, American Academy of Pediatrics, Inc.

Michigan Dental Association
Michigan Dental Hygienists' Association
Michigan Oral Health Coalition
Minnesota Academy of Pediatric Dentistry
Minnesota Chapter, American Academy of Pediatrics
Minnesota Dental Association
Minnesota Dental Therapy Association
Mississippi Academy of Pediatric Dentistry
Mississippi Chapter of the American Academy of Pediatrics
Mississippi Dental Association
Missouri Academy of Pediatric Dentistry
Missouri Coalition for Oral Health
Montana Chapter of the American Academy of Pediatrics
National Association of Pediatric Nurse Practitioners
National Dental Association
National Network for Oral Health Access
Nebraska Dental Association
Nebraska Society of Pediatric Dentistry
Nevada Academy of Pediatric Dentistry
Nevada Dental Association
New Hampshire Academy of Pediatric Dentistry
New Hampshire Chapter of American Academy of Pediatrics
New Jersey Academy of Pediatric Dentistry
New Jersey Oral Health Coalition
New Mexico Academy of Pediatric Dentistry
New York Academy of Pediatric Dentistry
North Carolina Dental Society
North Central Society of Pediatric Dentistry
Northern Virginia Dental Society
Ohio Academy of Pediatric Dentistry
Ohio Chapter, American Academy of Pediatrics
Ohio Dental Association
Oklahoma Academy of Pediatric Dentistry
Oklahoma Chapter of the American Academy of Pediatrics
Oral Health Coalition of Alabama
Oral Health Kansas, Inc.
Oral Health Ohio
Oregon Academy of Pediatric Dentistry
Pacific Northwest University of Health Sciences - School of Dental Medicine
Pennsylvania Academy of Pediatric Dentistry
Pennsylvania Chapter, American Academy of Pediatrics
Pennsylvania Coalition for Oral Health
Pennsylvania Dental Hygienists' Association
Pennsylvania Rural Health Association
Rhode Island Dental Association
Santa Fe Group
Sjogren's Foundation, Inc.
Smiles for Life
South Carolina Chapter of the American Academy of Pediatrics
South Dakota Dental Association
South Dakota Society of Pediatric Dentistry
Southeastern Society of Pediatric Dentistry
Tennessee Academy of Pediatric Dentistry
Tennessee Dental Association
Texas Academy of Pediatric Dentistry
Texas Pediatric Society
University of Texas School of Dentistry at Houston
Utah Academy of Pediatric Dentistry
Utah Chapter of the American Academy of Pediatrics
Vermont Environmental Justice Network
Vermont State Dental Society
Virginia Academy of Pediatric Dentistry
Virginia Health Catalyst
VOICES for Alabama's Children
Washington State Academy of Pediatric Dentistry
Washington State Dental Association
Washington State Oral Health Coalition
Western Society of Pediatric Dentistry
West Virginia Chapter, American Academy of Pediatrics
West Virginia Dental Hygienists' Association
West Virginia Oral Health Coalition, Inc
Wisconsin Academy of Pediatric Dentistry
Wisconsin Chapter of the American Academy of Pediatrics
Wisconsin Dental Association
Wyoming Dental Association

The American Academy of Pediatric Dentistry (AAPD) is the recognized authority on children's oral health. Founded in 1947, the AAPD is a not-for-profit professional membership association representing the specialty of pediatric dentistry. Its over 11,000 members provide primary care and comprehensive dental specialty treatments for infants, children, adolescents, and individuals with special health care needs. As advocates for the optimal oral health of all children, the AAPD promotes evidence-based policies, best practices, and clinical guidelines; educates and informs policymakers, parents and guardians, and other health care professionals; supports research; and provides continuing professional education for pediatric dentists and general dentists who treat children. Visit the AAPD website at www.aapd.org or the AAPD's consumer website at www.mychildrensteeth.org for more from the BIG Authority on little teeth.