

Commentary on the Scientific Opinion of the Panel on Food Additives and Nutrient Sources added to Food concerning sodium monofluorophosphate as a source of fluoride added for nutritional purposes to food supplements (Question No EFSA-Q-2006-277, EFSA-Q-2006-295). Adopted on 27th November 2008.

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Professor Vyvyan Howard is a medically qualified toxico-pathologist and is an expert on effects of toxic substances on the fetus and infant during the developmental period of life. He is currently the President of the International Society of Doctors for the Environment which is a World Health Organisation and United Nations recognised NGO representing some 30,000 medical doctors around the world. He has served on UK Government regulatory committees and is currently Professor of Bioimaging at the University of Ulster.

21st January 2009

- 1) The opinion does not address the safety of fluoride nor the amount of fluoride that can be safely consumed, these topics being deemed to be outside the remit of the Panel.
- 2) The fact that sodium monofluorophosphate is being considered by a Panel that addresses nutrient sources added to food is a tautology. By definition, if a nutrient is withdrawn from the diet, a deficiency condition will emerge. This is the way most of the vitamins were discovered. If fluoride is completely excluded from the human diet no deficiency condition emerges. There is no nutritional requirement for fluoride.
- 3) The Panel makes absolutely no reference to the growing literature on: IQ loss following foetal exposure in fluoridated areas; increased osteosarcoma incidence in young males in fluoridated areas; increased fracture rates on fluoridated areas. It maintains that dental fluorosis is the most sensitive endpoint although the current literature would suggest that exposure during development that is not the case.
- 4) The Panel concedes that in children the potential fluoride contribution from sodium monofluorophosphate 'supplementation' would cause 'tolerable upper intake levels to be exceeded in most cases'. This is the time of life when one is most vulnerable to developmental toxicity from fluoride.
- 5) A recent paper describes the findings of a longitudinal study which has been running for 16 years and shows that cavity free status has little to do with fluoride intake (Warren JJ, Levy SM, Broffitt B, Cavanaugh JE, Kanellis MJ, Weber-Gasparoni K. Considerations on Optimal Fluoride Intake Using Dental Fluorosis and Dental Caries Outcomes - A Longitudinal Study. J Public Health Dent. 2008 Nov 21 (ahead of print).
- 6) In conclusion the opinion stated by the Panel should not, in my opinion, be used to argue that fluoride supplementation of food or water is safe. Exactly the opposite appears to be the case.