



August 5, 2005

RE: Bone Cancer-Fluoride Link

Hon. Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency

Dear Administrator Johnson:

We, the undersigned representatives of a majority (eleven) of EPA's employee unions, are requesting that you direct the Office of Water to issue an Advanced Notice of Proposed Rulemaking setting the maximum contaminant level goal for fluoride at zero, in accordance with Agency policy for all likely or known human carcinogens. Our request is based on the overall weight of the evidence supporting the classification of fluoride as a human carcinogen, including new information from Harvard on the link between fluoride in drinking water and osteosarcoma in boys that was conveyed to you in a meeting with union officials on May 4, 2005.

We appreciate that the Agency anticipates a report next year from the National Research Council on the propriety of its current drinking water standards for fluoride. But it seems highly inappropriate for EPA to do nothing now that it is in possession of this science, while millions of young boys continue to be exposed unwittingly to the elevated risk of a fatal bone cancer as the Agency waits for the NRC to issue its report, then for the report to undergo peer review, and then for the Agency to undertake its own deliberations.

By issuing an Advanced Notice of Proposed Rulemaking the Agency would inform the public and local health authorities about the results of the doctoral dissertation from the Harvard School of Dental Medicine by Elise Bassin without committing the Agency to a formal rulemaking until all those other steps are taken.

It is noteworthy that when industry becomes aware of important new scientific findings like this, it has (depending on the specific statute) a very brief time to notify EPA. The Agency is then expected to take timely and appropriate action based on the

specifics of that notification. In the present case EPA is aware of important new, high quality evidence of potentially serious danger to young boys drinking fluoridated water, and we believe EPA has an ethical duty to send an effective warning immediately about this hazard.

It may in fact be appropriate for you to direct EPA's Office of Criminal Enforcement to investigate why Dr. Bassin's study, which was of sufficient quality for her to earn her doctoral degree, remained hidden from EPA for four years. Alternatively, you could request that the Department of Justice undertake the investigation.

As you know, the apparent cover up of the link between water fluoridation and a seven-fold increased risk of osteosarcoma in young boys, shown by the research of Dr. Bassin, is now national news. Major newspapers, including the *Washington Post* and the *Wall Street Journal* have covered the story. The Environmental Working Group has petitioned the National Toxicology Program to classify fluoride as a human carcinogen based in part on Dr. Bassin's work. (We recommend EWG's petition as a succinct and authoritative overview of the total weight of peer-reviewed evidence supporting the classification of fluoride as a human carcinogen.) EWG has also caused an investigation of the cover up to be started by Harvard and NIEHS, which funded the research.

The eyes of the nation are on the federal science establishment because of a host of scientific integrity issues. Former EPA Assistant Administrator Lynn Goldman and Roni Neff have just published a paper in the *American Journal of Public Health* on the cost of delayed adoption of health-protective standards that illuminates the real public health costs of the government's failure to act on sound scientific evidence.

We believe our Agency can make an important statement about its commitment to scientific integrity and its application to public health protection by taking the precautionary action we are recommending.

We at EPA can be ahead of the curve on this important issue or behind it. We do not think the latter choice is in the best interest of the public, the Civil Service or EPA, and we fervently and respectfully hope that you will agree with us. As a wise man once said, "The science is what the science is."

We will be happy to discuss this with you and your advisers at your convenience.

Sincerely,

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