



February 27, 2026

Environmental Protection Agency
Department of Health and Human Services

Re: Review of Science on Fluoride in Drinking Water: Preliminary Assessment Plan and Literature Survey

Docket ID No. EPA-HQ-OW-2025-3823

Dear Administrator Zeldin:

On behalf of the undersigned organizations, the American Network of Oral Health Coalitions (ANOHC) respectfully submits these comments on the U.S. Environmental Protection Agency's (EPA) preliminary assessment plan to review fluoride in drinking water and potential human health effects.

ANOHC is the national membership organization representing state oral health coalitions across the United States. Our members work collaboratively with public health agencies, health professionals, community organizations, and policymakers to improve oral health outcomes and strengthen prevention efforts. Together, we share a commitment to advancing policies and practices grounded in sound scientific evidence.

We recognize EPA's responsibility to protect public health and appreciate the agency's commitment to reviewing emerging research. Given the potential implications of this assessment for federal drinking water standards, it is essential that the review be transparent, methodologically rigorous, and focused on evidence relevant to real-world conditions in the United States.

Clear criteria for study selection would strengthen the assessment. In particular, explicit guidance on how studies are identified, prioritized, and defined as "recent" would improve confidence in the process, especially given the wide range of fluoride exposure levels represented across the literature. Anchoring the evidence base to exposure conditions applicable to U.S. community water systems, including the Maximum Contaminant Level of 4.0 mg/L, the Secondary Maximum Contaminant Level of 2.0 mg/L, and the recommended fluoridation level of approximately 0.7 mg/L, would help ensure that conclusions are relevant to domestic populations.

Consideration of study location and population characteristics is also critical. Much of the research on potential neurodevelopmental effects involves populations exposed to substantially higher natural fluoride concentrations than those typically found in the United States. Differences in environmental conditions, nutrition, and baseline exposures can influence outcomes and limit the applicability of findings across settings. Prioritizing studies conducted in the United States, or in populations with comparable exposure profiles, would strengthen the relevance of the assessment for public health decision-making.

Recent U.S.-based research illustrates the importance of this context. A nationally representative study of more than 26,000 individuals found no evidence of long-term cognitive harm associated with childhood exposure to fluoride at levels typical of community water fluoridation and reported modestly higher cognitive performance during adolescence (Warren et al., 2025). Findings such as these provide an important perspective when interpreting studies conducted in higher-exposure environments.

Additional transparency regarding the screening process would also be beneficial. Clear documentation of inclusion criteria, exclusion decisions, and analytical methods would help stakeholders understand how the evidence base was assembled and ensure confidence that the final assessment reflects the most relevant and scientifically sound research available.

We appreciate EPA's careful consideration of this issue and encourage the Agency to ensure that its conclusions are grounded in high-quality evidence applicable to U.S. drinking water conditions. Our organizations stand ready to serve as partners and resources as EPA continues this work.

Thank you for the opportunity to provide comments.

Sincerely,
American Network of Oral Health Coalitions

Signatories

Arizona Oral Health Coalition
Arkansas Oral Health Coalition
Children's Oral Health Network of Maine
Connecticut Oral Health Advocacy Coalition
Florida Oral Health Alliance
Georgia Oral Health Coalition
Idaho Oral Health Alliance
Illinois Oral Health Coalition
Indiana Oral Health Coalition
Maryland Dental Action Coalition
Michigan Oral Health Coalition
Missouri Coalition for Oral Health
Oral Health Kansas

Oral Health Ohio
New Hampshire Oral Health Coalition
New Jersey Oral Health Coalition
New York State Oral Health Coalition
North Carolina Oral Health Collaborative
Pennsylvania Coalition for Oral Health
Puerto Rico Oral Health Coalition
Rhode Island Oral Health Coalition
South Carolina Oral Health Action Network
Utah Oral Health Coalition
Virginia Health Catalyst
Washington State Oral Health Coalition
West Virginia Oral Health Coalition
Wisconsin Oral Health Coalition

References

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National Toxicology Program. (2024). *NTP monograph on the state of the science concerning fluoride exposure and neurodevelopment and cognition*. National Institute of Environmental Health Sciences. <https://ntp.niehs.nih.gov>

U.S. Environmental Protection Agency. (2024). *Drinking water regulations and contaminants: Fluoride*. <https://www.epa.gov/sdwa/drinking-water-regulations-and-contaminants>

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Warren, J. R., et al. (2025). Childhood fluoride exposure and cognition across the life course. *Science Advances*, 11, eadz0757. <https://doi.org/10.1126/sciadv.adz0757>