

## **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](http://www.aapd.org) or the AAPD's consumer website at [www.mychildrensteeth.org](http://www.mychildrensteeth.org) for more from the BIG Authority on little teeth.*