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FLUORIDATION NOT UNDER "INVESTIGATION" BY FDA

A recent article by Jack Anderson and associates reported that the United States Food and Drug Administration (FDA) was investigating fluoridation and specifically mentioned Dr. Lloyd B. Tepper, Associate Commissioner for Science, FDA. Although the American Dental Association (ADA) determined and publicized the fact that FDA was not "investigating" fluoridation and had no plans for such an "investigation," the allegation has persisted. Dr. Tepper has furnished the Chief Dental Officer, United States Public Health Service, with information clarifying the misunderstanding. Salient portions of his statement are furnished for your information.

". . . The reported 'careful tentative steps [by FDA] to reconsider fluoridation' is the reporters' interpretation of an interest on my part to consider the views of Edward Groth, Ph.D., in the realm of science and public policy. As you know, Dr. Groth used fluoridation as one of the examples of a policy issue in his dissertation for the doctoral degree.

"You are also aware, of course, that the Food and Drug Administration does not have jurisdiction in the matter of fluoridation of public water supplies and that my interests on the subject are essentially personal. Certainly there is no FDA 'investigation' underway, and I am aware of no new evidence that would stimulate a general investigation, by us or others.

"It had been my original intention to postpone commenting on Dr. Groth's views until I had had a chance to examine in detail the aforementioned dissertation, a copy of which has been on order for about five or six weeks. I feel, however, that I should delay no longer in responding, especially since I have at hand a pre-publication copy of a paper by Groth which, in

his words, 'condenses the major points of the portion of my dissertation which deals with fluoridation, and may be a smaller bite to swallow than plunging right into the magnum opus.'

"In reading Dr. Groth's paper, I find that it is a well written presentation quite devoid of the strident tone which characterizes much of the literature on fluoridation which appears outside refereed journals. On the other hand the paper contains a sufficient number of factual errors or distressing innuendos to cause me to doubt the objectivity of his approach or the merit of his analysis of the scientific and political issues fundamental to this public health measure."

Dr. Tepper further indicated that there are many dubious statements in the paper and that this paper as written by Dr. Groth is "essentially uncritical, biased, and not supportive of sound public health practices."

Dr. Tepper commented on several of the allegations presented by Dr. Groth. His comments on the allegations by opponents that the research has been biased, flawed, conspiratorial in nature or not supported by double blind studies are of particular note:

"Subsequently, I detect a clever attempt to suggest that scientists on both sides of the fluoridation issue are equally well qualified, that 'highly competent' scientists with 'true expertise in the field' continue to assert that fluoridation is of questionable value. I am unable to identify in the paper these scientists in opposition. This dubious suggestion that there is a body of sound scientific evidence demonstrating that fluoridation is unwise is accompanied by what seems to me to be a conspiratorial interpretation of the actions of fluoride proponents. That the Newburgh and Grand Rapids studies were carried out by dental scientists who had believed fluoridation to be a useful public health measure is interpreted as some kind of questionable practice.

"With respect to these studies, it is my best judgment that the views expressed by Dr. Groth, to the effect that studies of the effectiveness of water fluoridation have been flawed by non-objective evaluation of results, cannot be supported. In the Aurora-Rockford study, for example, examinations included bite-wing roentgenograms which were interpreted blindly by examiners who had no way of knowing whether

films in a given case came from Rockford or Aurora. Similarly in the Newburgh-Kingston study intra-oral films were randomized in order by statisticians so that the interpreters could not know whether they were reading Newburgh or Kingston films. As you very well know, the beneficial effects of a fluoridated water supply were clearly established in these two test situations, and the objectivity in interpretation of the films was assured.

"While it is possible, of course, for an observer to be biased in his grading of the appearance of a tooth, it is difficult to see how an observer could be biased in identifying whether a tooth was present or totally absent: judgment here is not required. Evidence from the Newburgh-Kingston study and others of a similar design clearly demonstrated that a fluoridated water supply was associated with a dramatically reduced number of missing first molars. 'Blind' studies from abroad are entirely consistent with this observation. In connection with these studies conducted abroad it is interesting to note the consistent caries reduction rate of between 50% and 60%. I am not sure how this consistent and reproducible pattern of caries reduction could be a manifestation of international bias or some sort of pro-fluoridation conspiracy.

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"I am puzzled by Dr. Groth's assertion that the Public Health Service will not fund studies to reveal the alleged harmful effect of fluoride. Any reasonable grant application in this field will go to the appropriate study section, the members of which are not selected according to their views on fluoridation. The proposal of each applicant will receive objective review by the study section, and I reject the inference that a meritorious protocol would be rejected on 'political' grounds."

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A subsequent article by Jack Anderson, while taking exception to the press release by ADA, commented; "Our own evidence indicates that fluoridation is probably both safe and effective."

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