

Rahaman, Tulsi

To: ZZG-COUNCIL

Subject: False and Misleading Statements by Peel Region Public Health

REFERRAL TO Health Services  
 RECOMMENDED  
 DIRECTION REQUIRED \_\_\_\_\_  
 RECEIPT RECOMMENDED \_\_\_\_\_

From: Carole Clinch [mailto:caclinch@gmail.com]

Sent: February 18, 2010 2:01 PM

To: ZZG-COUNCIL

Cc: Thompson, Allan; Groves, Annette; Binu Korah; Corbasson, Carmen; Parrish, Carolyn; Moore, Elaine; ZZG-Chair; Adams, Eve; Dale, Frank; Miles, Gael; Carlson, George; Gibson, Grant; McCallion, Hazel; Sanderson, John; Sprovieri, John; Mahoney, Katie; Prentice, Maja; Morrison, Marolyn; Iannicca, Nando; Mullin, Patricia; Saito, Pat; Palleschi, Paul; Paterak, Richard; Whitehead, Richard; McFadden, Sue; Fennell, Susan

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LEGISLATIVE SERVICES	
COPY TO:	FOR:
Chair	✓ ✓ Committee
CAO	✓ ✓
Corporate Services	Council
Public Works	
Employee and Business Services	March 25/10 G.C.
Health Services	✓ ✓ File MOH
Human Services	
Peel Living	

February 18, 2010

Dear Regional Clerk and Peel Municipal Council

I request that the regional clerk, Ms. Carol Reid, please file this letter in the permanent record.

The Auditor General of Canada has been notified of the widespread and repetition dissemination of false and misleading statements by various government agencies, including the Public Health Service. These allegations have never been refuted. These allegations can be easily confirmed in the public record. Auditor General Petition #221E:

Misrepresentation and Omissions of Material Fact by Government Agencies

**1. False and Misleading statements by Peel Region Public Health**

Further evidence of false and misleading statements can be found in a recent letter received on February 18, 2010 from Peel Public Health (Donna Kern). For example, Unless Peel Region can provide evidence of the "official" position of the WHO with a criteria number, that they endorse the policy of artificial water fluoridation, the claim made by Donna Kern in this letter that the WHO endorses this policy of artificial water fluoridation is **false**. WHO ENVIRONMENTAL HEALTH CRITERIA 36, 1984, makes it clear that the opinions of consultants (e.g. dental trade organizations) do not represent the official policy position of the WHO":

"This report contains the collective views of an international group of experts and does not necessarily represent the decisions or the stated policy of the United Nations Environment Programme, the International Labour Organisation, or the World Health Organization" <http://www.inchem.org/documents/ehc/ehc/ehc36.htm>

The February 18, 2010 letter from Public Health states:

"Peel's treated water supply is regularly monitored and complies with Ontario's Safe Drinking Water Act to protect human health. Fluoride levels in Peel are maintained within the recommended standards of 0.5 – 0.8 mg/L as legislated by the "Act"."

HE-81-2

**The author of this letter has no legal expertise and is therefore unqualified to make any claims regarding the legality of artificial water fluoridation.**

The recommended standards are not a legal requirement of the Ontario SDWA 2002. These legal requirements were removed from the SDW Act in June, 2006. Furthermore, these standards are currently under review because the evidence from the National Research Council Review 2006 demonstrates clearly that many susceptible populations are being harmed and that recent research demonstrates no benefit. The above claim of safety and efficacy is therefore **false**. (see letter below from the US FDA.)

The Ontario Safe Drinking Water Act (SDWA 2002 c32, section 20 (1,3)) states clearly that additions of drinking water health hazards is not permitted; dilution is no defence.

Technical Support Document for Ontario Drinking Water Standards, Objectives and Guidelines ([http://www.ontario.ca/drinkingwater/stel01\\_046947.pdf](http://www.ontario.ca/drinkingwater/stel01_046947.pdf)) states:

“Standards, objectives and guidelines are considered to be the minimum level of drinking-water quality and in no way should be regarded as implying that allowing the degradation of a high quality water supply to the specified level or range is acceptable.”

## **2. Why is the Public Health cherry-picking the studies that they discuss with council and taxpayers?**

The most relevant and recent evidence to date demonstrating that artificial water fluoridation does not provide any benefit to oral health for the citizens of Peel is available in a study by Dr. Ito, commissioned by Peel Region and paid for the taxpayers of Peel Region. Have the results of this study been discussed in council or provided to taxpayers? If not, why not? Other Canadian studies follow.

Azarpazhooh A, Stewart H, Chief Dental Officer for Toronto. Oral Health Consequences of the Cessation of Water Fluoridation in Toronto 2006 August.

This meta-analysis demonstrates that cavity rates remained the same or continued to decline in communities which discontinued artificial water fluoridation.

Ito D, President of Ontario Association of Public Health Dentistry. Determinants of caries in adjacent fluoridated and non-fluoridated cities. IADR/AADR/CADR 85th General Session and Exhibition March 21-24, 2007 # 2757.

“We found virtually no difference in caries prevalence or severity between 7-year-old children from schools in non-fluoridated Caledon and schools matched on socioeconomic factors, in fluoridated Brampton.”

Your letter of Feb 18, 2010 mentions “Elizabeth Treasure et al. in the York Report of 2002. The report concludes that the benefits to water fluoridation outweigh the harms. “ Please provide the full citation or full paper for this paper. The prestigious York Review 2000 chairman wrote a letter refuting the public health claims for safety and efficacy.

[www.yorkshiretoday.co.uk/ViewArticle2.aspx?SectionID=101&ArticleID=1651774](http://www.yorkshiretoday.co.uk/ViewArticle2.aspx?SectionID=101&ArticleID=1651774)

### 3. Fluoridation chemicals are unapproved, unregulated drugs. Are they legal?

A fundamental flaw in the opinion of proponents of fluoridation is the failure to recognize the difference between 'additives' and 'drugs.' The misbranding of fluoridated water as a mere 'additive' instead of a 'drug' has permitted government agencies to circumvent Federal and Provincial drug laws.

The political implications of this are clear. Without the constraints of the normal drug approval process (Food and Drug Act), a municipality could add any drug to municipal water and misbrand it as a mere "additive." The use of unregulated, unapproved drugs in drinking water has led to a "slippery slope" - ethically and legally.

Health Canada and the US government have both now stated clearly that fluoridation chemicals are unregulated, unapproved drugs. Some examples:

“The Food and Drug Administration Office of Prescription Drug Compliance has confirmed, **to my surprise, that there are no studies to demonstrate either the safety or effectiveness of these drugs** which FDA classifies as **unapproved new drugs.**” Source: Letter from Dr. David Kessler, M.D., Commissioner, United States Food and Drug Administration, June 3, 1993 to Congressman Kenneth Calvert, Chairman, Subcommittee on Energy and Environment, Committee on Science, Washington, D.C.

"Please note that **fluoride compounds added to water systems are not the same as the fluoride compounds used in the dentist's office and they are not regulated as drugs by Health Canada.**" Source: letter from Health Canada Drug Product Database Department, Jan 7, 2010

The NRC 2006 REVIEW reveals why it is an **uncontrolled drug**.

**Table 2-4** shows that susceptible groups consume up to **ten times** more than the average; e.g., diabetics, lactating mothers, athletes, construction workers, police, firefighters, and military.

**Table B-11** shows source of daily water intake by age group and acute dose threshold data. This is an estimate for how long it can take for that acute dose to be reached by various age groups in the population for a range of fluoride concentrations

**Table B-14** shows that the range of consumption is four times greater for the 99<sup>th</sup> percentile group than the average group;

A recent and relevant study from Thunder Bay, Ontario demonstrates that fluorosilicates contribute to the leaching of lead into community drinking water: Vukmanich 2009 Effects of F on Water Chemistry

HE-81-4

Sincerely,

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Carole Clinch BA BPHE  
Spokesperson & Research Coordinator

People for Safe Drinking Water

[http://www.newmediaexplorer.org/chris/2009/10/26/people\\_for\\_safe\\_drinking\\_water.htm](http://www.newmediaexplorer.org/chris/2009/10/26/people_for_safe_drinking_water.htm)

Auditor General of Canada Petition #221: Misrepresentation and Omissions of Material Fact by Federal Government Agencies

Clinch CA. Fluoride Interactions with Iodine and Iodide: Implications for Breast Health. Fluoride April-June 2009;42(2):75-87.

[http://www.fluorideresearch.org/422/files/FJ2009\\_v42\\_n2\\_p00i-iii.pdf](http://www.fluorideresearch.org/422/files/FJ2009_v42_n2_p00i-iii.pdf)

Long H, Jin Y, Lin M, Sun Y, Zhang L, Clinch C. Fluoride Toxicity in the Male Reproductive System. Fluoride Oct-Dec 2009;42(4):275-291.

[http://www.fluorideresearch.org/424/files/FJ2009\\_v42\\_n4\\_p260-276.pdf](http://www.fluorideresearch.org/424/files/FJ2009_v42_n4_p260-276.pdf)