HE-A1-1



REPORT **General Committee**

For Information

DATE:

March 9, 2010

REPORT TITLE: FLUORIDATION OF PEEL'S MUNICIPAL WATER SUPPLY

FROM:

Janette Smith, Commissioner of Health Services

David L. Mowat, MBChB, MPH, FRCPC, Medical Officer of Health

OBJECTIVE

The objective of this report is to update Peel Regional Council on the issue of water fluoridation in Peel.

REPORT HIGHLIGHTS

- The Region of Peel water supplies to Brampton and Mississauga have been fluoridated since the late 1960's for the prevention of tooth decay.
- Peel's treated water supply is regularly monitored and complies with Ontario's Safe Drinking Water Act (SWDA) 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
- An extensive and credible body of scientific research supports the findings that water fluoridation is the most effective, equitable and efficient way to protect dental health even when other sources of fluoride (e.g. toothpaste, topical fluorides) are used.
- More than 90 national and international professional health organizations have endorsed the use of fluoride at recommended levels to prevent tooth decay including Health Canada, the Canadian Public Health Association, the Canadian Dental Association, the Canadian Medical Association and other reputable international organizations such as the United States Centres for Disease Control and Prevention and the World Health Organization.
- Water fluoridation benefits all residents served by community water supplies, regardless of their social or economic status.

DISCUSSION

1. Background

Region of Peel municipal water supplies to Brampton and Mississauga have been fluoridated since the late 1960's. Community water fluoridation has been identified by the (U.S.) Centres for Disease Control as one of the 10 great public health achievements of the 20th century. More than 90 national and international professional health organizations have endorsed the use of fluoride at recommended levels to prevent tooth decay including Health Canada, the Canadian Public Health Association, the Canadian Dental Association, the Canadian Medical Association and other reputable international organizations such as the

United States Centres for Disease Control and Prevention and the World Health Organization.

2. Fluoridation of Peel's Municipal Water Supply

There is a relatively small amount of fluoride in drinking water, only enough to help prevent tooth decay. The Ontario Ministry of Health and Long-Term Care, in partnership with the Ontario Ministry of the Environment, sets very strict guidelines for fluoride in drinking water (0.5-0.8 mg/I). In establishing these guidelines, other potential sources of fluoride ingestion such as fluoridated toothpaste, food, commercial beverages and others are taken into consideration. These guidelines follow Health Canada's recommended fluoride concentration levels.

In Peel, the amount of fluoride added to drinking water is carefully monitored and maintained within the standards and guidelines recommended by the Ministry of the Environment and the Ministry of Health and Long-Term Care.

3. Research on the Safety of Fluoride

Water fluoridation has been well studied. Credible scientific organizations and associations continue to review the evidence on the health risks and benefits of fluoridation. Their reports are publicly available and constitute the basis for the continuing support of water fluoridation. The most recent review is from Health Canada. In 2007, a Health Canada appointed panel of experts concluded that community drinking water fluoridation remains an effective public health method to reduce the prevalence of dental cavities. There is no credible evidence that water fluoridation is associated with any adverse health effects at the current recommended levels.

It is required that fluoride in water be at concentrations of 0.5-0.8 mg/L. Consuming water with fluoride concentrations higher than this level can result in a condition known as dental fluorosis or "mottled teeth". Fluorosis appears as white or brown streaks on the teeth. These marks are cosmetic and do not affect the function of the teeth. Fluorosis usually occurs when too much fluoride is ingested while the teeth are being formed. The amount of fluoride added to Peel's municipal drinking water is <u>not</u> at the level that may cause significant fluorosis. In addition, there is no evidence that adding fluoride to drinking water has negative environmental impacts.

4. Benefits to Community Water Fluoridation

The value of water fluoridation should not be underestimated. Tooth decay is the single most common chronic childhood disease, one that is highly preventable. Research has shown that fluoridated drinking water greatly reduces the number of cavities in children's teeth, which contributes to their healthy development. The benefits of fluoridation are well documented. In 2009, Dr. David C. Williams (Acting Chief Medical Officer of Health) in his correspondence to all Public Health Units in Ontario, stated:

- Where fluoride has been added to municipal water supplies, there has been a marked decline in rates of tooth decay;
- The health benefits extend to all residents in a community regardless of age, education, or socio-economic status.

5. Public Inquiries and Concerns of Fluoride in Drinking Water

In spite of the extensive scientific reviews and reports demonstrating the effectiveness of community water fluoridation, Peel Public Health receives concerns about the safety and effectiveness of fluoride use from both residents and non-residents. Concerns are thoroughly reviewed and addressed by carefully reviewing all new information and resources available to inform our decision-making. Concerns related to fluoridation of municipal water supply have recently been brought forward by a member of the public (emails from a resident of Waterloo, dated February 1st, 2010 and February 18, 2010, attached to this report as Appendix I). Peel Public Health has prepared a response to the February 18, 2010 correspondence, attached to this report as Appendix II.

It is recognized that there is considerable information available to public audiences on the topic of community fluoridation. The balance of scientific evidence shows that community water fluoridation continues to be a safe, efficient and equitable means of bringing the benefit of fluoride to the entire population.

6. Proposed Direction

Peel Public Health will continue to respond directly to concerns identified by the members of the public related to the fluoridation of municipal drinking water. Community water fluoridation continues to be one of the strongest public health interventions to promote health. Peel Public Health recognizes the value of fluoridation and will continue to support this public health measure in the Region of Peel.

CONCLUSION

An extensive and credible body of scientific research supports the findings that water fluoridation is an equitable, safe and efficient means of preventing dental caries. The strength of the available evidence on this issue provides the necessary justification to continue community fluoridation efforts for Peel's municipally treated water supply.

Janette Smith

Commissioner of Health Services

David L. Mowat, MBChB, MPH, FRCPC

1. I Mowat

Medical Officer of Health

Approved for Submission:

For further information regarding this report, please contact [Gayle Bursey] at extension 2617 or via email at gayle.bursey@peelregion.ca

Authored By: Sheila Datta

Legislative Services

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APPENDIX I

Email sent to Peel Public Health from Mrs. Carole Clinch

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

Subject: False and Misleading Statements by Peel Region Public Health

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"."

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

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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) 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 GeneralSession 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 socioeconomicfactors, 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

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 lead 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

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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.

<u>Table 2-4</u> 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.

<u>Table B-11</u> 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

<u>Table B-14</u> shows that the range of consumption is four times greater for the 99th 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: <u>Vukmanich 2009 Effects of F on Water Chemistry</u>

Sincerely,

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Carole Clinch BA BPHE Spokesperson & Research Coordinator

From: Kern, Donna

Sent: February 18, 2010 11:22 AM

To: 'caclinch@gmail.com'

Cc: Mullin, Patricia; Smith, Janette; Mowat, David; Bursey, Gayle; Otchere, Dan

Subject: FW: Artificial Water Fluoridation - No Benefits - Definite Harm

Message sent on behalf of Dr. Dan Otchere.

Dear Ms. Clinch:

Thank you for bringing forward your concerns about water fluoridation. As you are aware the Region of Peel municipal water supply has been fluoridated for nearly 40 years. Water fluoridation is supported and endorsed by many organizations including: the World Health Organization, the Canadian Medical Association, the Canadian Dental Association, and the Canadian Public Health Association.

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".

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The Region of Peel's decision to fluoridate municipal drinking water is based on the recommendations from the Ministry of the Environment and the Ministry of Health and Long-Term Care. These ministries rely on standards and reviews carried out by the federal government. Currently the Federal-Provincial-Territorial Committee on Drinking Water is in the process of reviewing comments submitted on the document "Fluoride in Drinking Water" when it was sent out for public comment in September 2009. As you state in your email, this document is one of many that were submitted to the committee for review. You also refer to a petition you have submitted to the Auditor General expressing your views about the review process. As a governmental body, we rely on a large body of credible scientific research related to fluoridation of municipal water supplies and look forward to the outcomes of the review that is currently being undertaken by the Federal-Provincial-Territorial Committee on drinking water.

The Region of Peel carefully reviews all available evidence related to water fluoridation. To date, the best evidence comes from the work done by Elizabeth Treasure et al. in the York Report of 2002. The report concludes that the benefits to water fluoridation outweigh the harms. The Federal Government has also commissioned reviews that have come to the same conclusions.

While we appreciate your concerns about fluoridation of community water supply, we would like to reiterate that we will continue to comply with the requirements for safe fluoridation levels as outlined in the Ontario Drinking Water Quality Standards. We will continue to monitor the water quality of Peel's municipal drinking water as has always been our practice.

Once again thank you for sharing your concerns about fluoridation in municipal water supplies.

Dr. Dan Otchere, BDS;DDPH;MSc.

Public Health Dentist, Region of Peel

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

Sent: February 1, 2010 3:35 PM

To: Carole Clinch

Subject: Artificial Water Fluoridation - No Benefits - Definite Harm

RE: Artificial Water Fluoridation - No Benefits - Definite Harm

February 1, 2010

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Dear Peel Region Council

Attached is an excerpt from a submission to Health Canada on Nov 27, 2009 by Kathleen M. Thiessen, Ph.D., SENES Oak Ridge, Inc., Center for Risk Analysis, professional in the field of risk analysis, including exposure assessment, toxicity evaluation, and risk assessment. She has recently served on two subcommittees of the National Research Council's Committee on Toxicology, including the National Research Council's Committee on Fluoride in Drinking

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Water 2006 Review. Fluoride in Drinking Water - Kathleen M. Thiessen, Ph.D.

This 1 page brochure with simple bar graph presents two (2) recent 2009 papers, whose authors include members of Health Canada's expert panel, which clearly show no dental health benefit from ingested fluoride, but definite harm.

She also points out that the recent Health Canada draft Review for fluoride in drinking water misrepresents the National Research Council Review;

"Health Canada gives an inaccurate characterization of the National Research Council's work."

NRC Review 2006 states: "Fluoride appears to have the potential to initiate or promote cancers," even though the overall evidence is "mixed." & "Health Canada should be aware that three U.S. courts have found fluoridated water to be carcinogenic to humans (described in detail by Graham and Morin 1999)."

Both the Environmental Commissioner of Canada and the Auditor General of Canada have been shown clear evidence of repetitive and widespread dissemination of false and misleading information and misrepresentation of scientific papers and reviews by dental groups, the Public Health Service, and Health Canada in a <u>petition</u> sent to the Auditor General of Canada petitions office. An audit has been requested.

Sincerely,

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

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

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

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APPENDIX II

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Peel Public Health's Response to Fluoridation Concerns submitted by a resident of Waterloo (Mrs. Carole Clinch)

The concerns about community water fluoridation were itemized in an email sent by Mrs. Carole Clinch to Peel Regional Council on February 1st and 18th, 2010. Responses to these concerns by Peel Public Health are detailed below.

1. "Peel Health should provide evidence of the "official" position of the World Health Organization (WHO) that they endorse the policy of artificial water fluoridation."

Peel Public Health's Response to item #1:

Please see the World Health Organization Sixtieth World Health Assembly: WHA60.17 (item #4) urging member States of the following:

"for those countries without access to optimal levels of fluoride, and which have not yet established systematic fluoridation programmes, to consider the development and implementation of fluoridation programmes, giving priority to equitable strategies such as the automatic administration of fluoride, for example, in drinking-water, salt or milk, and to the provision of affordable fluoride toothpaste;"

Further, the World Health Organization's 2003 Oral Health Report and 2006 Fluoride in Drinking-water publication indicate that the WHO endorses implementing "the most appropriate means of maintaining a constant low level of fluoride in as many mouths as possible". This includes fluoridation of drinking-water as well as other means such as individual use of fluoride toothpastes. The WHO Oral Health Report further notes that "Community water fluoridation is effective in preventing dental caries in both children and adults. Water fluoridation benefits all residents served by community water supplies regardless of their social or economic status."

The World Health Organization established a guideline value for fluoride in 1984 for safe fluoride levels in drinking-water. The guideline value of 1.5mg/L is recommended by the WHO as a level at which dental fluorosis is minimal. This guideline value is not intended to be fixed but is subject to adaptation based on local diet and water intake. Subsequent re-evaluation of the WHO guideline since its establishment has concluded that there is no evidence to suggest a need for revision to the guideline. It should be noted that Dr. Poul Erik Petersen, author of the 2003 World Oral Health Report, is the Chief of WHO's Oral Health Programme and not an expert consultant.

The following sources provide credible information about fluoride in drinking water from the World Health Organization:

Fawell et al. (2006). Fluoride in drinking-water. World Health Organization

Petersen, PE (2003). World Oral Health Report. Continuous improvement of oral health in the 21st century: The approach of the WHO Global Oral Health Programme. World Health Organization.

2. Concerning Peel's treated water supply - "The author of this letter has no legal expertise and is therefore unqualified to make any claims regarding the legality of artificial water fluoridation."

Peel Public Health's Response to item #2:

Region of Peel staff are qualified to quote relevant provincial acts for a practice in the Region of Peel. Peel Health would like to reiterate that 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 mg/L – 0.8 mg/L as legislated by the Act. This statement does not imply that Peel Health is legislated to add fluoride to our municipal water supply. Rather, we are legislated to meet the regulatory requirements contained in the Ontario Drinking Water Quality Standards. Four important health parameters are legislated for monitoring under the Safe Drinking Water Act including: trihalomethanes, fluoride, bacteria (which include Escherichia coli and total coliforms), and lead.

3. "Why is Public Health cherry-picking the studies that they discuss with council and taxpayers? Have the results of [Dr. Ito's study] been discussed in council or provided to taxpayers?"

Peel Public Health's Response to item #3:

Peel Health uses the best available evidence by carefully reviewing the recommendations published from systematic reviews. Systematic reviews are studies that identify, appraise and synthesize all high quality research evidence relevant to a specified health topic or issue such as water fluoridation.

Mrs. Clinch cites a study conducted in Peel by Dr. Ito that investigated children's oral health practices, source water consumption, eating habits and utilization of dental services among seven year old children residing in Caledon. Children of non-fluoridated regions of Caledon were compared to those living in similar socio-economic conditions in fluoridated Brampton.

Since the community of interest, Caledon, is relatively affluent, the study drew its comparison children from affluent areas of Brampton. Study results indicated that for children from comparable and relatively affluent areas in Peel, there were no differences detected in caries prevalence or severity that could be attributed to the effects of water fluoridation. Most of the study participants had strong patterns of preventive behaviours and good access to professional care. As such, the study did not determine the effects of fluoridation among poorer areas of Peel where access to dental care might be less and patterns of home care different. Accordingly, the findings of this study are not to be taken as a measurement of the effectiveness of fluoridation on a population-wide basis in Peel Region, nor can they be generalized, to other communities.

It is also important to note that, as a general research principle, where disease levels are unstable, it is difficult to determine the effect of any one factor, such as fluoridation; in a study such as this one that collect data at only one point in time. As well, study findings acknowledged the difficulty of allocating children into fluoridated and non-fluoridated groups; the partition is neither certain nor stable. For example, children from non-fluoridated areas may be exposed to fluoride through other sources such as toothpaste, oral supplements and prophylactic treatments performed by dentists. As such, it is difficult to assess true fluoride exposure levels between children residing in non-fluoridated versus fluoridated communities.

4. "Have the results of [Dr. Ito's study] been discussed in council or provided to taxpayers?"

Peel Public Health's Response to item #4:

Dr. Ito's study findings were presented to Regional Council on December 11, 2007. The Council Report is entitled: "Report of the Investigation Into the Potential Benefit of Fluoridating the Remainder of Caledon's Communal Water Supply."

5. Your letter of Feb 18th, 2010 mentions "Elizabeth et al. in the York Report of 2000". Please provide the full citation or full paper."

Peel Public Health's Response to item #5:

Citation for Full Report:

McDonagh, M.; Whiting, P.; Bradley, M.; Cooper, J.; Sutton, A.; Chestnut, I.; Misso, K.; Wilson, P.; Treasure, E.; Kleijnen, J.; A Systematic Review of Public Water Fluoridation, 2000 NHS Centre for Reviews and Dissemination, University of York (ISBN 1-900640-16-3)

Citation of the report as published in the British Medical Journal: McDonagh, M.; Whiting, P.F.; Wilson, P.; Sutton, A.J.; Ivor, C.; Cooper, J.; Misso, K.; Bradley, M.; Treasure, E.; Kleijnen, J.; A systematic Review of Public Water Fluoridation *BMJ* 2000;321:855-859 (7 October)

6. "Fluoridation chemicals are unapproved, unregulated drugs. Are they legal?"

Peel Public Health's Response to item #6:

The regulation of chemicals and drugs falls outside the mandate of the Region of Peel Health Department. Individuals should contact the Federal government for inquiries pertaining to the regulation of fluoride.

Municipalities are allowed by provincial legislation to add fluoride to drinking water under the provision of the Fluoridation Act (R.S.O. 1990, chapter F.22). The Fluoridation Act details how to go about deciding on the establishment of a fluoridation system <u>or</u> the discontinuation of a fluoridation system (i.e. whether decisions should be passed by council or whether they should be put to plebiscite). The decision to fluoridate the water lies with Regional Council with guidelines set by the Ministry of the Environment and the Ministry of Health and Long-Term Care. The Medical Officer of Health and his/her staff provides expert advise to Council on relevant issues pertaining to fluoridation.