

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	Colorado Academy of Pediatric Dentistry
Academy of General Dentistry	Connecticut Oral Health Initiative
Access Ready Inc.	Connecticut Society of Pediatric Dentists
Alaska Academy of Pediatric Dentistry	Connecticut State Dental Association
Alcan Dental Cooperative	Delaware Academy of Pediatric Dentistry
American Academy of Oral & Maxillofacial Pathology	Dental Trade Alliance
American Academy of Oral Medicine	Elevate Oral Care
American Academy of Orofacial Pain	Florida Academy of Pediatric Dentistry
American Academy of Pediatrics California Chapter 1	Florida Chapter of the American Academy of Pediatrics
American Academy of Pediatrics, California Chapter 3	Florida Dental Association
American Academy of Pediatrics, California Chapter 4	Foundation for Health Leadership and Innovation's North
American Academy of Pediatrics, DC Chapter	Carolina Oral Health Collaborative
American Academy of Periodontology	Georgia Academy of Pediatric Dentistry
American Association for Dental, Oral, and Craniofacial Research	Gerontological Society of America
American Association of Endodontists	Hawaii Dental Association
American Association of Orthodontists	Idaho Chapter of the American Academy of Pediatrics
American Association of Public Health Dentistry	Idaho State Dental Association
American College of Prosthodontists	Illinois Chapter, American Academy of Pediatrics
American Dental Association	Illinois Oral Health Coalition
American Dental Hygienists' Association	Illinois Society of Pediatric Dentists
American Fluoridation Society, Inc.	Indiana Dental Association
American Institute on Disparities in Public Health	Indiana Oral Health Coalition
American Network of Oral Health Coalitions	International Association of Paediatric Dentistry
American Public Health Association Oral Health Section	Iowa Academy of Pediatric Dentistry
American Society of Dentist Anesthesiologists	Iowa Dental Association
American Student Dental Association	Justice in Aging
Arcora Foundation	Kansas Chapter, American Academy of Pediatrics
Arizona Academy of Pediatric Dentistry	Kentucky Academy of Pediatric Dentistry
Arizona Dental Association	Knox County Dental
Arizona Oral Health Coalition	Louisiana Academy of Pediatric Dentistry
Arkansas Society of Pediatric Dentists	Louisiana Dental Association
Arkansas State Dental Association	Maine Chapter, American Academy of Pediatrics
California Dental Association	Maine Dental Association
California Pan-Ethnic Health Network	Maine Primary Care Association
California School-Based Health Alliance	Maine Society of Pediatric Dentistry
California Society of Pediatric Dentistry	Maryland Academy of Pediatric Dentistry
Children Now	Maryland Dental Action Coalition
Children's Oral Health Network of Maine	Maryland State Dental Association
Coalition of Texans with Disabilities	Massachusetts Chapter, American Academy of Pediatrics, Inc.

Michigan Dental Association	Pacific Northwest University of Health Sciences - School of Dental Medicine
Michigan Dental Hygienists' Association	Pennsylvania Academy of Pediatric Dentistry
Michigan Oral Health Coalition	Pennsylvania Chapter, American Academy of Pediatrics
Minnesota Academy of Pediatric Dentistry	Pennsylvania Coalition for Oral Health
Minnesota Chapter, American Academy of Pediatrics	Pennsylvania Dental Hygienists' Association
Minnesota Dental Association	Pennsylvania Rural Health Association
Minnesota Dental Therapy Association	Rhode Island Dental Association
Mississippi Academy of Pediatric Dentistry	Santa Fe Group
Mississippi Chapter of the American Academy of Pediatrics	Sjogren's Foundation, Inc.
Mississippi Dental Association	Smiles for Life
Missouri Academy of Pediatric Dentistry	South Carolina Chapter of the American Academy of Pediatrics
Missouri Coalition for Oral Health	South Dakota Dental Association
Montana Chapter of the American Academy of Pediatrics	South Dakota Society of Pediatric Dentistry
National Association of Pediatric Nurse Practitioners	Southeastern Society of Pediatric Dentistry
National Dental Association	Tennessee Academy of Pediatric Dentistry
National Network for Oral Health Access	Tennessee Dental Association
Nebraska Dental Association	Texas Academy of Pediatric Dentistry
Nebraska Society of Pediatric Dentistry	Texas Pediatric Society
Nevada Academy of Pediatric Dentistry	University of Texas School of Dentistry at Houston
Nevada Dental Association	Utah Academy of Pediatric Dentistry
New Hampshire Academy of Pediatric Dentistry	Utah Chapter of the American Academy of Pediatrics
New Hampshire Chapter of American Academy of Pediatrics	Vermont Environmental Justice Network
New Jersey Academy of Pediatric Dentistry	Vermont State Dental Society
New Jersey Oral Health Coalition	Virginia Academy of Pediatric Dentistry
New Mexico Academy of Pediatric Dentistry	Virginia Health Catalyst
New York Academy of Pediatric Dentistry	VOICES for Alabama's Children
North Carolina Dental Society	Washington State Academy of Pediatric Dentistry
North Central Society of Pediatric Dentistry	Washington State Dental Association
Northern Virginia Dental Society	Washington State Oral Health Coalition
Ohio Academy of Pediatric Dentistry	Western Society of Pediatric Dentistry
Ohio Chapter, American Academy of Pediatrics	West Virginia Chapter, American Academy of Pediatrics
Ohio Dental Association	West Virginia Dental Hygienists' Association
Oklahoma Academy of Pediatric Dentistry	West Virginia Oral Health Coalition, Inc
Oklahoma Chapter of the American Academy of Pediatrics	Wisconsin Academy of Pediatric Dentistry
Oral Health Coalition of Alabama	Wisconsin Chapter of the American Academy of Pediatrics
Oral Health Kansas, Inc.	Wisconsin Dental Association
Oral Health Ohio	Wyoming Dental Association
Oregon Academy of Pediatric Dentistry	

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 or the AAPD's consumer website at www.mychildrensteeth.org for more from the BIG Authority on little teeth.