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February 27, 2026

Hon. Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. N.W.
Washington, DC 20460

Docket ID No. EPA-HQ-OW-2025-3823

The Academy of General Dentistry, on behalf of its 40,000 members, submits this comment to the United State Environmental Protection Agency (EPA) on its proposed Fluoride Preliminary Assessment Plan and Literature Survey. The AGD is the largest dental organization solely representing general dentists. AGD prides itself on providing the highest quality continuing education to make sure that dentists provide the best possible oral health care to all Americans.

The AGD requests that the literature survey prioritize peer-reviewed studies published in reputable Journals. National Academies of Sciences, Engineering, and Medicine (NASEM) is considered the gold standard for peer review. Inclusion of non-peer reviewed studies, particularly of fluoride exposure in foreign countries is not consistent with a goal of Gold Standard Science.

Studies like, JR Warren *et al.* Childhood fluoride exposure and cognition across the life course. *Sci. Adv.* **11**,eadz0757(2025) that studied the neurocognitive effects of fluoride on subjects in the United States should be weighed more heavily as it is more trustworthy than studies conducted in other countries.

It is important to remember that many of the studies that allegedly show detrimental effects on neurocognition, the level of fluoride exposure was much greater than the 0.7mg/l level that is followed by municipal water systems in the United States. Overreliance on studies from less scientifically reputable Journals will reduce the accuracy of any study review. Studies from Bronze level journals will not produce Gold level science.

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For instance, in the National Toxicology Program (NTP) report, 62% of the studies reviewed by NTP were published in less reputable journals. In fact, these studies were published in journals not indexed by the National Library of Medicine.

As part of the Literature Survey, the EPA should consider how levels of fluoride are measured, as some methods, such as urinary sampling, are less reliable.

The AGD appreciates the opportunity to comment on the proposed Fluoride Preliminary Assessment Plan and Literature Survey and believes that a Gold Standard Science survey of peer-reviewed reliable studies will show that fluoride at the level in the community systems of the United States does not have negative neurocognitive effects.

Sincerely,

Marc Worob, DDS, FAGD

President

Academy of General Dentistry

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