

**FLUORIDATION CHEMICALS ARE
UNREGULATED
UNTESTED
UNAPPROVED
INEFFECTIVE
DRUGS**

By

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Co-Author of «Fluoridation: Autopsy of a Scientific Error»

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Fluoridation

Autopsy of a Scientific Error



BERGER

2012 PEEL RESOLUTION

February 12, 2012 Passed a Resolution calling Health Canada to do at least:

- 1. 1 long-term toxicology study to determine the health effects in humans**
- 2. at least 1 properly conducted controlled clinical trial to determine effectiveness**

Objective:

to reassure the citizens of Peel that the use of fluorosilicates added to drinking water for the purpose of treating a disease is safe.

2017 PEEL RESOLUTION

February 22, 2017 Passed a Resolution calling Ministry of Health and Long Term Care to do at least:

- 1. To undertake appropriate and comprehensive toxicity testing necessary to reassure the public that the use of HFSA in water fluoridation treatments is safe;**
- 2. Take legislative responsibility for the regulation and administration of HFSA in water fluoridation treatments across the province relieving local governments from what is a provincial responsibility.**

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

«March, 23, 2018

Public health Ontario has review NSF/ANSI 60 on behalf of the ministry. NSF/ANSI 60 establishes requirements to be protective of human health for products and their impurities that may be added directly during water treatment, storage and distribution.»

...

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

«The established safeguard noted above continue to ensure the safety of fluoridate drinking water in Ontario. The ministry will also continue to monitor and review new research.

The ministry urges all municipalities to protect their communities from avoidable health issues by maintaining fluoride in their drinking water, to promote the health of all residents.»

Sincerely,

A handwritten signature in black ink, appearing to read 'Roselle Martino', written in a cursive style.

Roselle Martino
Assistant Deputy Minister
Population and Public Health Division

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

Ms Roselle Martino, assistant Deputy Minister is misleading the Committee :

1. The Ministry hasn't supplied the toxicological review as requested by Peel Region **to prove safety of HFSA**, so without it, **it cannot be claimed SAFE**;
2. The Ministry implies that NSF/ANSI 60 establishes requirements to be protective of human health for fluoridation chemicals **WHICH THEY DO NOT** (see NSF disclaimers);
3. The Ministry implies that NSF/ANSI 60 has the jurisdiction and the competence to guarantee the efficiency of HFSA **WHICH IT DOES NOT**;
4. The Ministry implies that it is legal and ethical to administer to a population a water treatment chemical to mitigate and prevent a disease **WHICH IT IS NOT**.

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

5. The Ministry assumes that fluoridation would supply to each citizen an exact and proper amount of fluoride when using tap water as a vehicle for the administration of the fluoride without considering the huge variability of daily intake of water and fluoride from all other sources. It make fluoridation of water an absurd vehicle of distribution of a drug as a daily dose cannot be controlled.
6. The Ministry assumes erroneously that concentration is equivalent to dose while such a concept is obviously invalid.
7. The Ministry assumes that it knows the exact daily dose of fluoride needed to prevent dental decay without causing any harm to anyone, including the most vulnerable subjects in the society; babies, children, the infirm, the elderly and those that drink a lot of water.
8. The Ministry assumes that it knows what no health authority in the world knows, the exact effective and safe dose of fluoride; that is either 1, 2, 3, 4, 5, 6 or 7 mg daily. **There aren't any scientific consensus on the exact effective and safe dose.**

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

9. The Ministry assumes that it knows what **no health authority** in the world knows, the **exact effective and safe dose** of fluoride that would take in account the weight of the subject expressed in mg/kg/day; is it 0.01, 0.02, 0.03, 0,04, 0.05, 0.06, 0,07, 0.08, 0.09 mg/kg/day.
10. **Without knowing what the exact appropriate intake of fluoride that would be safe for the most vulnerable and that would be effective to prevent decay if such a dose would be proven safe and effective, the Ministry is putting the entire population at risk of side effects, including dental fluorosis that is already reported at an epidemic levels.**

NSF/ANSI 60

TRADE REGULATORY ORGANIZATIONS

- NO **LEGAL JURISDICTION** ON PRODUCTS USED FOR TREATING OR PREVENTING A DISEASE.
- NO COMPETENCY IN EVALUATING THE EFFECTIVENESS OF A SUBSTANCE USED FOR A THERAPEUTIC PURPOSE.
- NO COMPETENCY IN EVALUATING THE SAFETY OF A SUBSTANCE USED FOR A THERAPEUTIC PURPOSE.

NSF DOCUMENTS

NSF International Standard/
American National Standard
for Drinking Water Additives —

**Drinking water treatment chemicals —
Health effects**

NSF DOCUMENT DISCLAIMERS

Disclaimers¹

NSF Standards provide basic criteria to promote and protect public health. Provisions for safety have not been included in this Standard because governmental agencies or other national standards-setting organizations provide safety requirements.

**NO CANADIAN OR AMERICAN GOVERNMENTAL AGENCY
HAS EVER PROVIDED SAFETY TOXICOLOGY STUDIES**

FOOD AND DRUG ACT DEFINITIONS

“drug”

“drug” includes any substance or mixture of substances manufactured, sold or represented for use in

- (a) the diagnosis, treatment, **mitigation or prevention of a disease, disorder or abnormal physical state**, or its symptoms, in human beings or animals,
- (b) restoring, **correcting or modifying organic functions** in human beings or animals

FOOD AND DRUG ACT DEFINITIONS

FOOD

Prohibited sales of food

4. (1) No person shall sell an article of food that
- (a) **has in or on it any poisonous or harmful substance;**
 - (b) **is unfit for human consumption;**
 - (c) consists in whole or in part of any filthy, putrid, disgusting, rotten, decomposed or diseased animal or vegetable substance;
 - (d) is adulterated; or
 - (e) **was manufactured, prepared, preserved, packaged or stored under unsanitary conditions.**

FOOD AND DRUG ACT DEFINITIONS

“food”

“food” includes any article manufactured, sold or represented for use as food or drink for human beings, chewing gum, and any ingredient that may be mixed with food for any purpose whatever;

(WATER IS A FOOD BY DEFINITION)

FOOD AND DRUG ACT DEFINITIONS

“Unsanitary conditions”

“unsanitary conditions” means such conditions or circumstances as might contaminate with dirt or filth, or render injurious to health, a food, drug or cosmetic.

FOOD AND DRUG ACT DEFINITIONS

Unsanitary manufacture, etc., of food

7. No person shall manufacture, prepare, preserve, package or store for sale any food under unsanitary conditions.

FOOD AND DRUG ACT DEFINITIONS

Deception, etc., regarding food

5. (1) No person shall label, package, treat, process, sell or advertise any food in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.

LEGAL CLASSIFICATION OF FLUORIDATION CHEMICALS

- 1. TOXIC AND DANGEROUS SUBSTANCES?**
- 2. DRUGS?**
- 3. NATURAL HEALTH PRODUCTS?**
- 4. MINERAL NUTRIENTS FOR FOOD FORTIFICATION?**
- 5. FOOD ADDITIVES?**
- 6. WATER TREATMENT CHEMICALS?**

**CLAIMED PURPOSE
DEFINES
THE LEGAL NATURE OF A
PRODUCT
AND ITS
APPLICATIONS OF LAWS
PERTINENT TO IT**

WHY FLUORIDATION ?

1. Claimed to prevent dental cavities?

OR

2. To make drinking water safe/potable?

**Products making
SPECIFIC HEALTH CLAIMS
e.g. Preventing Cavities**

ARE DEFINED AS EITHER :

1. DRUGS

OR

2. NATURAL HEALTH PRODUCTS

**THEY MUST THEN COMPLY WITH
STRICT REGULATIONS**

Supreme Court of Canada 1957¹

Fluoridation

- is a "**compulsory preventive medication**",
- is “not to promote the ordinary use of water as a physical requisite for the body”
- has a “special health purpose”.

**Ruling never contested by the
Canadian Government.**

1- Metropolitan Toronto v. Forest Hill (Village), [1957] S.C.R. 569
<http://csc.lexum.umontreal.ca/en/1957/1957scr0-569/1957scr0-569.html>

**ARE THEY CONTROLLED AND
APPROVED BY HEALTH CANADA AS
DRUGS OR
NATURAL HEALTH PRODUCTS?**

NO ...

Petition #299, Answer #1 by Health Canada to the the Auditor General of Canada,
available from: http://www.oag-bvg.gc.ca/internet/English/pet_ip_e_938.html

**ARE THESE FLUORIDATION
CHEMICALS APPROVED BY
HEALTH CANADA AS
MINERAL NUTRIENTS FOR FOOD
FORTIFICATION?**

NO ...

Petition #299, Answer #1 by Health Canada to the the Auditor General of Canada,
available from: http://www.oag-bvg.gc.ca/internet/English/pet_ip_e_938.html

FLUORIDATION CHEMICALS ARE NOT
PREPARED WITHIN «GOOD
MANUFACTURING PRACTICES» («GMP»)

Any drug, natural health product, nutrient for food fortification or food should be prepared in sanitary conditions required to satisfy the Food and Drug Act related to the **«Good Manufacturing Practices» («GMP»)**

**DOES HEALTH CANADA EXERT
ANY **REGULATION** ON
FLUORIDATION CHEMICALS?**

NO ...

Petition #299, Answer #1 by Health Canada to the the Auditor General of Canada,
available from: http://www.oag-bvg.gc.ca/internet/English/pet_lp_e_938.html

SHALL NOT BE USE AS FOOD

FLUOROSILICIC ACID 40% SOLUTION

GROSS WEIGHT:1312KGS

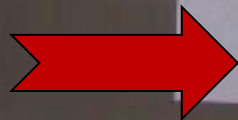
NET WEIGHT:1250KGS

LOT NO.:2010DXJL-07

BATCH:10100701

USED ONLY FOR INDUSTRIAL PURPOSES

SHALL NOT BE USED FOR FOOD



**THEN,
WHAT
ARE
FLUORIDATION
CHEMICALS?**

Fluoridation chemicals are unprocessed scrubber liquor of the phosphate industry smoke stack emissions or manufactured from fluoroapatite



If these emissions are released in the atmosphere, they are air pollutants

If these emissions are released in the river, they are water pollutants

When these same chemicals are added to the municipal water and somehow, they become a beneficial nutrient good for your teeth and your overall health...

Fluoridation chemicals are usually recycled toxic waste

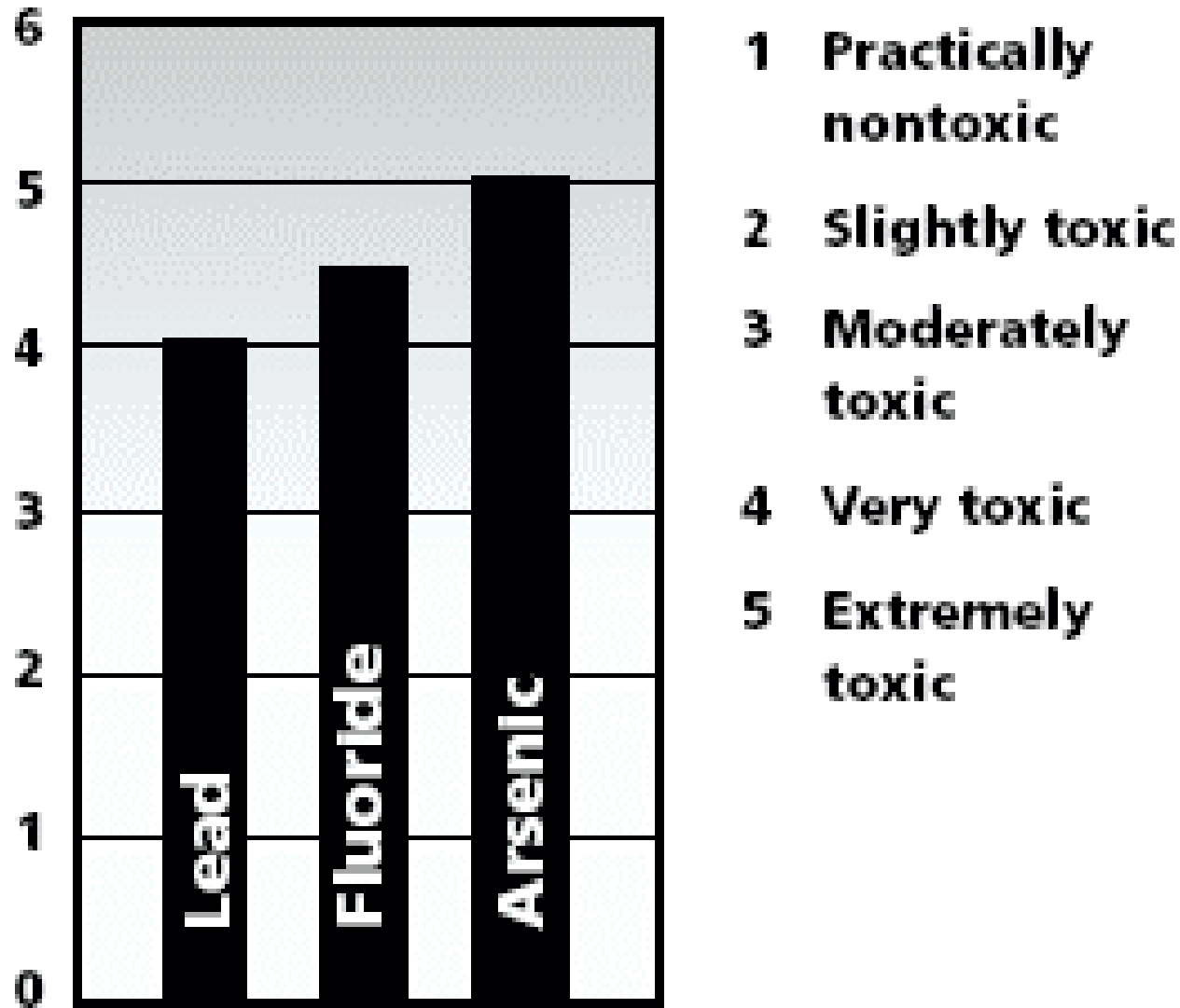


It comes with a small quantity of **arsenic, lead, chromium, mercury, and nucleotides.**

Fluoride Toxicity

SOURCE: base on lethal (LD 50) de Robert E.Gosselin and al, 1984. Clinical Toxicology of Commercial Products 5th ed., Williams and Wilkins, Baltimore.

Relative Toxicity



Untested, uncontrolled, unregulated chemical waste taken directly from the industry and dripped into your drinking water



**Not of
pharmaceutical
grade
nor
food grade
but
industrial
grade
fluoride.**

Are Fluoridation Products “Natural”?

NO...

They are MAN-MADE

ARE THEY WATER TREATMENT CHEMICALS?

**HEALTH CANADA,
THE MINISTRY OF HEALTH AND
PUBLIC HEALTH AUTHORITIES
CLAIM THEY ARE.**

ARE THEY REALLY WATER TREATMENT CHEMICALS?

NO...

**Their aim is not to treat the water
to make it safe and drinkable.**

Their aim is to prevent dental cavities.

**ARE FLUORIDATION CHEMICALS
COMPLIANT WITH STANDARD 60 OF
THE NATIONAL SANITATION
FOUNDATION (NSF)?**

NO ...

**They have a NSF certificate but do not
meet all the requirements of
NSF Standard 60.**

**The main essential
requirement
for the NSF Standard 60 is
chronic toxicological tests
that demonstrate
safety of the HFSA.**

«**Chronic**» means «**long term**»

Are there any Chronic Toxicology
Tests available for HFSA?

NO...

**NSF Fact Sheet states that toxicological
testing is required,
but the NIEHS 2001 Review, US EPA and
Safety Data Sheets state they
DO NOT EXIST.**

Sodium Fluorosilicate

Material Safety Data Sheet

11. Toxicological Information

11.1 Acute toxicity:

Inhalation: No data available.

Oral: LD50, rat, 125mg/kg (Sodium hexafluorosilicate)

Dermal: No data available.

Irritation: No data available.

Sensitization: No data available.

Comments: No data available.

11.2 Chronic toxicity: No data available.

11.3 Carcinogenic Designation: None

- **Letters from the US Congressional Hearings**
- **US EPA**
- **National Institute of Environmental Health Sciences 2001 Review**
- **HEALTH CANADA**
- **ONTARIO MINISTRY OF HEALTH**
- **NSF**

state that fluoridation products do NOT have TOXICOLOGICAL STUDIES

Therefore...

They have not been proven safe...

**IF FLUORIDATION CHEMICALS
DO NOT HAVE LONG TERM
TOXICOLOGICAL STUDIES, THEN
SAFETY
CANNOT
BE DEMONSTRATED**

They are not proven... safe...

Therefore...

**They do not satisfy NSF Standard
60...**

Therefore...

**THE CERTIFICATION COULD BE
CONSIDERED AS INVALID?**

**They are not compliant with
Quebec and Ontario law (Ontario
Safe Drinking Water Act)**

Finally, what are fluoridation chemicals?

1. IF NOT DRUGS?
2. IF NOT NATURAL HEALTH PRODUCTS?
3. IF NOT MINERAL NUTRIENTS FOR FOOD FORTIFICATION?
4. IF NOT FOOD ADDITIVES?
5. IF NOT WATER TREATMENT CHEMICALS?
6. **THEY MUST BE HAZARDOUS WASTES?**

FLUORIDATION CHEMICALS SATISFY ALL CRITERIA FOR HAZARDOUS AND TOXIC WASTES

- Règlement sur les matières dangereuses c. Q-2, r.32, Loi sur la qualité de l'environnement (L.R.Q., c. Q-2, a. 31, 46, 70.19, 109.1 et 124.1)
- Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations DORS/2005-149 (FEDERAL)

THE LEGAL CLASSIFICATION OF FLUORIDATION CHEMICALS AS HAZARDOUS AND TOXIC SUBSTANCES ARE DETERMINED IN LAWS

13 laws et regulations

- Loi sur les produits dangereux L.R.C. (1985), ch. H-3
- Liste des substances toxiques – Annexe 1
- Liste des substances d'intérêts prioritaire LSIP1.
- Loi canadienne sur la protection de l'environnement -LCPE (1999) CH. 33
- Loi de 1992 sur le transport des marchandises dangereuses (1992, ch. 34)
- Règlement sur le transport des marchandises dangereuses
- Règlement sur l'exportation et l'importation de déchets dangereux et de matières recyclables dangereuses (REIDDMRD)
- Règlement sur les mouvements interprovinciaux des déchets dangereux
- Loi interdisant la vente, l'importation et la publicité de produits dangereux
- Règlement sur les produits chimiques et contenants de consommation (2001)
- Règlement sur les matières dangereuses c. Q-2, r.32
- Loi sur le contrôle des renseignements relatifs aux matières dangereuses
- Convention de Bâle sur le contrôle des mouvements transfrontiers de déchets dangereux et de leur élimination

LES FLUORURES,
LA FLUORATION ET
LA QUALITE DE L'ENVIRONNEMENT

Rapport préparé pour

LE MINISTRE DE L'ENVIRONNEMENT

par le

COMITE AVISEUR

SUR LA FLUORATION DES EAUX
DE CONSOMMATION

Ministère de l'Environnement

Gouvernement du Québec

Sainte-Foy

Novembre 1979

Copie électronique disponible sur le site web d'Action Fluor Québec à :
<http://www.acmqvq.com/afq/audio-video/Livre%20Rouge-leger.pdf>

TOXIC SUBSTANCES CAN FIT ONLY TWO CATEGORIES

1. TOXIC WASTES OR SUBSTANCES

2. DRUGS

**HEALTH CANADA
HAS NOT APPROVED ANY
FLUORIDATION CHEMICALS
AS DRUGS.**

**IT IS ILLEGAL TO ADMINISTER AN
APPROVED OR UNAPPROVED DRUG
WITHOUT A MEDICAL LICENCE,
AND WITHOUT INFORMED CONSENT
TO ANY RESIDENT.**

**ADMINISTERING ANY DRUG,
APPROVED OR UNAPPROVED,
TO RESIDENTS
WITHOUT CONSENT
CONTRAvenes
ARTICLE 7 OF THE
CANADIAN CHARTER OF
RIGHTS AND FREEDOMS**

Drugs Should Not Be Put Into Drinking Water Because:

1. No one can control how much of any drug is consumed daily by each individual.
2. Citizens are deprived of Informed Choice:
 - Information regarding risks and benefits
 - Choice to refuse or accept drug
 - No trained professional to assess medical need and adverse effects

**MUNICIPALITIES
SHOULD NOT USE
THE PUBLIC
WATER SUPPLY
AS A VEHICLE TO
ADMINISTER A
MEDICATION TO
THE POPULATION**

Fluoridation chemicals

NOT Regulated = NOT Safe

**Don't we deserve
to be
protected by
Government regulation?**

Who determines safety and efficacy of fluoridation chemicals ?

NO ONE!

NO Government Agency in Canada regulates fluoridation chemicals.

**WHICH HEALTH AUTHORITIES
CLAIM ACCOUNTABILITY FOR
FLUORIDATION?**

NONE...

NO ACCOUNTABILITY

It is not logical to accept the advice of those who accept no responsibility for these chemicals:

- **Health Canada**
- **Ontario Ministry of Health**
- **Ontario Ministry of Environment**
- **Ontario Ministry of Health Promotion**
- **Ontario Dental Association**
- **And over 90 organisations who endorse fluoridation**

Finally, who's Accountable?

Municipalities are legally responsible:

- You, the councillors, are the final decision makers**
- for choosing fluoridation chemicals**
- for adding fluoridation chemicals**

Pleading ignorance of the law is not an excuse

False Assumptions

- **Tax payers incorrectly assume** that these products are compliant with Canadian laws,
- **Tax payers incorrectly assume** that these products have been assessed for safety,
- **Tax payers incorrectly assume** that the product reduces cavities when swallowed,
- **Taxpayers incorrectly assume** that the Health Canada panel evaluating these products had the necessary expertise,
- **Taxpayers incorrectly assume** that the Health Canada panel reviewed all available research – not just the research that supports the policy.

3 methods for Removing Fluoride

1. **Reverse Osmosis** – water wasteful, expensive to purchase and maintain.
2. **Distillation** – expensive to purchase, removes beneficial minerals, energy user
3. **Stop fluoridating** – simple and free

Which is easier?

Which is cheaper?

Which is logical?

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

THE MINISTRY'S RESPONSE **DOES NOT** ANSWER THE
REGIONS RESOLUTION

**REQUESTING TO ASSURE THE RESIDENTS
OF THE SAFETY AND EFFICACY OF HFSA**

FOR THE SOLE PURPOSE OF
PREVENTING DENTAL CAVITIES

TO **ALL** RESIDENTS OF PEEL

BY USING AN **UNAPPROVED DRUG** TO

MEDICATE THE RESIDENTS

WITHOUT THEIR INFORMED CONSENT

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

AS YOU HAVE NOW LEARNED, THE PROVINCE HAS

NOT PROVIDED THE ANSWERS TO YOU

IN ORDER FOR REGIONAL COUNCIL

TO REPORT BACK TO THE CONCERNED RESIDENTS OF PEEL

WHO HAVE BEEN ASKING FOR

PROOF OF SAFETY AND EFFICACY SINCE 2011

NO EVIDENCE OF SAFETY AND EFFICACY (NOT ENDORSEMENTS)

MEANS

YOU CANNOT CLAIM SAFETY AND EFFICACY

THEREFORE, THE INFORMATION YOU ARE RELYING ON FROM

PUBLIC OFFICIALS IS **INVALID** AS CLAIMS FOR

SAFETY AND EFFICACY OF HFSA

MUST BE BACKED UP BY REQUIRED TOXICOLIGAL STUDIES

WHICH I HAVE CONFIRMED FOR YOU TODAY

DO NOT EXIST!

MINISTRY OF HEALTH'S RESPONSE LETTER TO PEEL REGION

THEREFORE, IT IS INCUMBENT UPON YOU, AS THE

ULTIMATE DECISION MAKERS,

TO PROTECT THE HEALTH AND WELL BEING OF THE RESIDENTS

YOU WERE ELECTED TO SERVE AND PROTECT.

PLEASE CEASE AND DISMISS THIS

UNREGULATED, UNTESTED, UNETHICAL, UNAPPROVED AND INEFFECTIVE PRACTICE

WITHOUT FURTHER DELAY!

ALL RESIDENTS OF PEEL HAVE THE RIGHT TO SAFE DRINKING WATER

WHICH IS A FUNDAMENTAL HUMAN RIGHT

PLEASE JOIN THE 95% OF THE WORLD THAT DOES NOT FLUORIDATE

REDIRECT \$500,000.00 SPENT ON THE INEFFECTIVE FLUORIDATION

INTO PUBLIC HEALTH DENTAL PROGRAMS OF PREVENTION

**WE HAVE PROVEN THAT
FLUORIDATION CHEMICALS ARE
UNREGULATED
UNTESTED
UNAPPROVED
INEFFECTIVE
DRUGS**

**THE PRECAUTIONARY PRINCIPLE
SHOULD BE APPLIED**