

March 2, 2026

MEMORANDUM FOR: St. Clair County Municipalities with Municipal Water Systems

FROM: Dr. Remington Nevin, Medical Director, St. Clair County Health Department

SUBJECT: Interim Developments Since October 2025 in the Science and Regulatory Landscape Pertaining to Municipal Water Fluoridation

This memorandum is being sent to all St. Clair County municipalities with municipal water systems as a follow-up to my initial memorandum dated October 15, 2025. It provides an important update on recent developments in the science and regulatory landscape pertaining to municipal water fluoridation. As previously noted,ⁱ since September 2024 the U.S. Environmental Protection Agency (EPA) has been under federal court order to regulate fluoride in drinking water at the current recommended concentration of 0.7 ppm as an unreasonable risk to health under the Toxic Substances Control Act (TSCA).ⁱⁱ This order was based, in part, on the National Toxicology Program's (NTP) August 2024 findings of a consistent association between higher fluoride exposures (exceeding approximately 1.5 ppm) and lower IQ in children.ⁱⁱⁱ

Although EPA is appealing this order on procedural grounds, it has not contested the underlying scientific evidence on which it was based.^{iv} Indeed, since the NTP report, two additional major scientific assessments have further reinforced concerns regarding neurodevelopmental effects at or near 1.5 ppm fluoride in drinking water. A 2025 systematic review and meta-analysis by Taylor et al. in *JAMA Pediatrics* confirmed inverse associations between fluoride exposure and children's IQ, with statistically significant effects persisting even at exposures below 1.5 ppm.^v Separately, the European Food Safety Authority (EFSA) in July 2025 adopted 1.5 ppm as its reference point for developmental neurotoxicity when establishing safe intake levels, concluding that current limits do not adequately protect against aggregate exposure from all sources.^{vi}

In parallel, EPA has advanced a formal review under the Safe Drinking Water Act (SDWA). In April 2025, EPA announced an expedited reevaluation of fluoride science,^{vii} followed by the January 22, 2026 release of its "Review of Science on Fluoride in Drinking Water: Preliminary Assessment Plan and Literature Survey."^{viii} This process will produce a new toxicity assessment focused solely on potential adverse effects—including developmental neurotoxicity—to inform possible revisions to the current enforceable Maximum Contaminant Level (MCL) of 4.0 ppm.

In my professional opinion, under the SDWA framework, EPA is likely to begin with the scientific point of departure (POD) of approximately 1.5 ppm identified across these assessments. I anticipate that EPA will then apply several uncertainty (safety) factors to this POD, resulting in a net uncertainty factor of between 3 and 10 to account for variations in human sensitivity, potential gaps in the data, differences between study conditions and real-world exposures, and fluoride intake from other sources. This could result in a non-enforceable Maximum Contaminant Level Goal (MCLG) in the range of 0.15–0.5 ppm, substantially below the current optimal fluoridation level of 0.7 ppm for caries prevention.



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The enforceable MCL would then be set as close to the MCLG as is technically and economically feasible. Under the SDWA, this determination will consider only the practicality and cost of removing fluoride below the final MCLG, without reference to potential dental benefits. While community water fluoridation at 0.7 ppm has long been endorsed by federal public health authorities for its proven role in preventing dental caries, in my professional opinion, the completed SDWA process is likely to produce enforceable federal standards that will effectively preclude the addition of fluoride to public water supplies on public health grounds.

In light of these anticipated federal actions, in October 2025, the St. Clair County Advisory Board of Health endorsed my recommendation that the St. Clair County Health Department adopt local regulations prohibiting the addition of fluoride to municipal water systems in the county, under authority granted by the Public Health Code, including MCL 333.2435(d) and related provisions. I have recommended to the Health Officer that the department now prepare and release these regulations in draft, in anticipation of an extended period of public review and comment.

Given the clear direction of both EPA and local regulatory processes, I recommend that your municipality consider voluntarily discontinuing water fluoridation. Taking this step now would demonstrate decisive leadership — fully aligned with evolving public sentiment on fluoride that increasingly prioritizes protecting children’s neurodevelopmental health.

Municipalities retain sole authority over this decision under MCL 333.12721. I remain available to meet with your governing body or staff at a mutually convenient time to answer any questions in this regard, including on alternative caries-prevention strategies appropriate for your populations.

Sincerely,



Remington Nevin, MD, MPH, DrPH
Medical Director, St. Clair County Health Department

ⁱ See Medical Director’s Memoranda, Subject: Fluoride in St. Clair County Public Water Systems. June 17, 2025, and Subject: Recent Developments in the Science and Regulatory Landscape Pertaining to Municipal Water Fluoridation. October 15, 2025.

ⁱⁱ U.S. District Court Northern District of California. Food & Water Watch, Inc., et al., v. U.S. EPA. Case No. 17-cv-02162-EMC. Findings of Fact and Conclusions of Law. September 24, 2024. Available at: https://www.govinfo.gov/content/pkg/USCOURTS-cand-3_17-cv-02162/pdf/USCOURTS-cand-3_17-cv-02162-15.pdf

ⁱⁱⁱ National Toxicology Program, NTP Monograph on the State of the Science Concerning Fluoride Exposure and Neurodevelopment and Cognition: A Systematic Review, NTP Monograph No. 08. August 2024. Available at: https://ntp.niehs.nih.gov/sites/default/files/2024-08/fluoride_final_508.pdf.

^{iv} Reply Brief for Defendants-Appellants, Food & Water Watch, Inc. et al. v. United States Environmental Protection Agency et al., No. 25-384. 9th Circuit, January 22, 2026, appealing No. 3:17-cv-02162-EMC (U.S. District Court Northern District of California). Available at: <https://childrenshealthdefense.org/wp-content/uploads/073-EPAS-REPLY-BRIEF.pdf>.

^v Taylor KW, et al. Fluoride Exposure and Children’s IQ Scores: A Systematic Review and Meta-Analysis. JAMA Pediatrics. 2025;179(3):282–292.

^{vi} European Food Safety Authority Scientific Committee, et al. Updated consumer risk assessment of fluoride in food and drinking water including the contribution from other sources of oral exposure. EFSA J. 2025;23(7):e9478.

^{vii} U.S. Environmental Protection Agency. April 7, 2025. EPA will expeditiously review new science on fluoride in drinking water. Available at: <https://www.epa.gov/newsreleases/epa-will-expeditiously-review-new-science-fluoride-drinking-water>.

^{viii} U.S. Environmental Protection Agency. January 22, 2026. Review of Science on Fluoride in Drinking Water: Preliminary Assessment Plan and Literature Survey (EPA-821-P-26-001). Available at: <https://www.epa.gov/system/files/documents/2026-01/fluoride-human-health-toxicity-assessment-preliminary-assessment-plan-and-literature-survey-1-22-26.pdf>.