Dear Committee Members, Thanks for the opportunity to comment on the carcinogenicity and reproductive effects of Fluoride. I am attaching a letter and references as well as pasting my letter in to the body of this email.

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9-6-11

Carcinogen Identification Committee  
Cal EPA  
OEHHA

Dear Distinguished Committee Members,

I am writing to urge you to list Fluoride on the prop 65 list for being a carcinogen and a cause for reproductive harm and damage. I have studied this issue for some time now and believe that it’s use especially in water fluoridation must come to an end soon.

I will first address the carcinogenicity issue. According to Whitford, 1996, 99% of the fluoride in the body is accumulated in the skeletal system (Whitford, 1996). In addition, per the following studies, Bassin, 2001; Gruber and Baylink, 1991; Ganong, 1995; Kleerekoper, 1996; Whitford, 1996, “fluoride acts as a mitogen, increasing the proliferation of the osteoblasts”. these facts make the case for the mechanism by which fluoride could increase the risk of bonecancers.

A number of studies have found increased risk of osteosarcoma in adolescent males. Attached you will find the texts for two, Cohn 1992 and Bassin 2001 (published in May 2006 Cancer Causes and Control. Proponents of fluoridation will site a letter to the editor of Cancer Causes and Control of the same issue,
refuting the latter by Douglass. However, no study to support Douglass’s claims has been published by the now retired-from Harvard Prof. Douglass.

According to the NRC’s comprehensive fluoride review, p 336, the following are concerns:

“Fluoride appears to have the potential to initiate or promote cancers, particularly of the bone, but the evidence to date is tentative and mixed (Tables 10-4 and 10-5). As noted above, osteosarcoma is of particular concern as a potential effect of fluoride because of (1) fluoride deposition in bone, (2) the mitogenic effect of fluoride on bone cells, (3) animal results described above, and (4) pre-1993 publication of some positive, as well as negative, epidemiologic reports on associations of fluoride exposure with osteosarcoma risk.”

As to reproductive harm, the NRC review of 2006 also mentions this as a possibility:

“Freni (1994) found an association between high fluoride concentrations (3 mg/L or more) in drinking water and decreased total fertility rate.” Although water fluoridation is typically at the .7-1 ppm range, if one considers the significant increase in the fluoride content of processed foods such as mechanically deboned chicken, box cereals, juices, teas (on average, 3 times the level of fluoridated water), grape juice and other juices due to the use of fluoride containing pesticides, it is easy to see how high fluoride concentrations could occur in some populations. (See a U.N. study reviewing the various studies done on the fluoride content of various foods, attached below.)

NRC’s 2006 report also summarized the effects of fluoride on the endocrine system in the following way:

“In summary, evidence of several types indicates that fluoride affects normal endocrine function or response; the effects of the fluoride-induced changes vary in degree and kind in different individuals. Fluoride is therefore an endocrine disruptor in the broad sense of altering normal endocrine function or response, although probably not in the sense of mimicking a normal hormone. The mechanisms of action remain to be worked out and appear to include both direct and indirect mechanisms, for example, direct stimulation or inhibition of hormone secretion by interference with second messenger function, indirect stimulation or inhibition of hormone
secretion by effects on things such as calcium balance, and inhibition of peripheral enzymes that are necessary for activation of the normal hormone.”

As we is clearly understood, the various components of the endocrine system, as an interacting web must be functioning properly for the healthy development of a fetus to term, so a disruption to the thyroid or other gland can adversely affect pregnancies’ outcomes.

Thank-you very much for your consideration. Attached, are the texts of a number of key studies referred to above. I would truly appreciate a reply to my concerns.

Sincerely,

Glayol Sahba M.D.

NRC's report from 2006 as I am certain you have already seen is available on line at: www.nap.edu/openbook.php?record_id=11571

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