



**Submission Medicines Act 1981**

1 to: askmedsafe@moh.govt.nz

05/01/2015 09:14 p.m.

History:

This message has been replied to.

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

I do / do not (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

“It is proposed that a new regulation be made under section 105(1)(i) that:

Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name**

**Email:**

**Address:**

**Question 1.** Do you support the proposed amendment? If not why not?

**NO.** I do not support the proposed amendment because:

- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
- 3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
- 4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

**Question 2.** Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

**NO.** Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

**Post to:**

Regulations under the Medicines Act 1981 Consultation

Medsafe

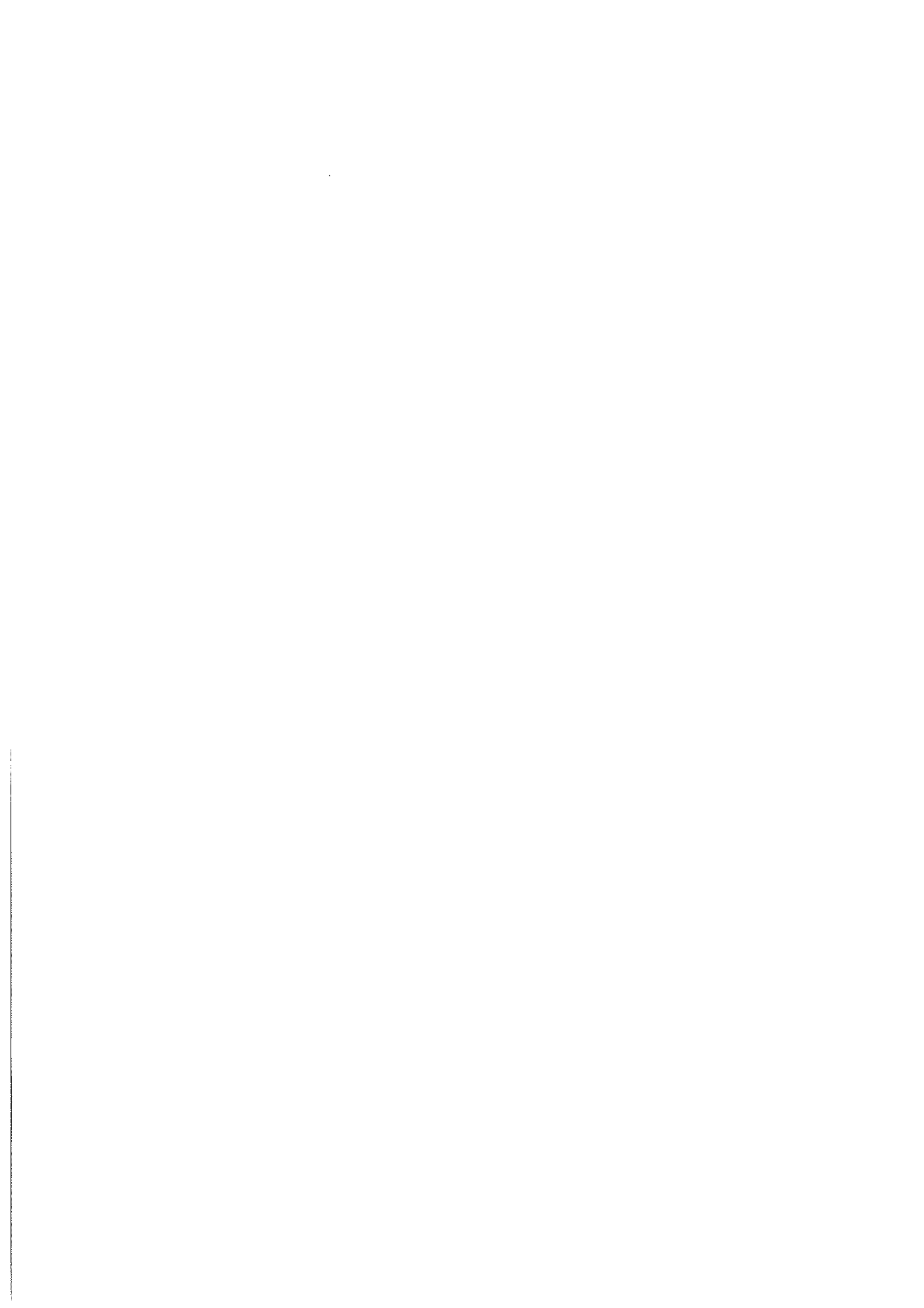
Clinical Leadership Protection & Regulation

Ministry of Health

PO Box 5013

Wellington 6145

**Email to:** [askmedsafe@moh.govt.nz](mailto:askmedsafe@moh.govt.nz)





**URGENT submission saying why fluoride should NOT be granted a legal exemption.**

to: askmedsafe@moh.govt.nz

05/01/2015 09:17 p.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

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“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name:

Email

...

Address

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fluoride

o: askmedsafe

05/01/2015 10:41 p.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name

Email:

Address:

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This email is free from viruses and malware because avast! Antivirus protection is active.  
<http://www.avast.com>





fluoride

o: askmedsafe

05/01/2015 10:43 p.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

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"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email

Address.

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---  
This email is free from viruses and malware because avast! Antivirus protection is active.  
<http://www.avast.com>







Fwd: Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

skmedsafe

06/01/2015 12:08 a.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

I do give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email:

Address:

Question 1. Do you support the proposed amendment? If not why not?

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- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
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Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

We should be free to CHOOSE, and that choice can be a topical treatment we purchase in our toothpaste or other voluntary product purchase. Forced Mass medication is not OK.

Kind regards

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## SUBMISSION FORM

Please provide your contact details below. You may also wish to use this form to comment on the proposed amendment.

|                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name:                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| If this submission is made on behalf of an organisation, please name that organisation here:            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Please provide a brief description of the organisation if applicable:                                   | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Address/email:                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Your interest in this topic (for example, local body, consumer, manufacturer, health professional etc): | <b>Consumer</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Question 1</b></p> <p><i>Do you support the proposed amendment? If not, why not?</i></p>          | <p><b>NO. I do not support the proposed amendment because:</b></p> <ol style="list-style-type: none"> <li><b>1. Fluoride is not a water treatment like chlorine</b></li> <li><b>2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine</b></li> <li><b>3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"</b></li> <li><b>4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines</b></li> </ol> |

**Question 2**

*Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.**

- 1. Fluoride and its compounds are not used to treat community water supplies.**
- 2. In community water fluoridation, the purpose of fluoride and its compounds is to treat people**

Please note that all correspondence may be requested by any member of the public under the Official Information Act 1982. If there is any part of your correspondence that you consider should be properly withheld under this legislation, please make this clear in your submission, noting the reasons why you would like the information to be withheld.

If information from your submission is requested under the Act, the Ministry of Health will release your submission to the person who requested it. However, if you are an individual, rather than an organisation, the Ministry will remove your personal details from the submission if you check the following box:

**I do not** give permission for my personal details to be released to persons under the Official Information Act 1982.

All submissions will be acknowledged, and a summary of submissions will be sent to those who request a copy. The summary will include the names of all those who made a submission. In the case of individuals who withhold permission to release personal details, the name of the organisation will be given if supplied.

**I do not wish to speak to my submission**

**Fluoride**

askmedsafe@moh.govt.nz

06/01/2015 12:43 a.m.

History: This message has been replied to.

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Dear Medsafe

SUBMISSION ON PROPOSAL THAT HFA AND SSF ARE NOT MEDICINES FOR THE PURPOSES OF THE MEDICINES ACT WHEN THEY ARE MANUFACTURED AND SUPPLIED OR DISTRIBUTED FOR THE PURPOSE OF FLUORIDATING COMMUNITY WATER SUPPLIES

QUESTION 1: DO YOU SUPPORT THE PROPOSED AMENDMENT? IF NOT, WHY NOT?

ANSWER TO QUESTION 1

I oppose the proposed amendment for the following reasons:

1 = No Regulation should be made exempting HFA and SSF from being medicines until the Court of Appeal has determined whether or not HFA and SSF are medicines under the Medicines Act.

2 = If HFA and SSF are medicines they should not be exempt from the Medicines Act.

3 = If HFA and SSF are not medicines there is no need for the exemption.

4 = The Medicines Act is designed to ensure the safety, quality and efficacy of medicines. HFA and SSF should be subject to these controls.

5 = These controls will ensure that people are not exposed to uncontrolled doses of fluoride from an industrial grade and heavy-metal contaminated fluoride substance.

6 = If fluoride tablets are not recommended for babies, toddlers and pregnant women, these sub-populations should not be ingesting fluoridated water.

7 = No protection against dental decay is provided by swallowing fluoride; consequently HFA and SSF should not be swallowed.

8 = Those people who believe there is a benefit in ingesting fluoride can buy sodium fluoride tablets from a pharmacy.

QUESTION 2: ARE THERE ANY OTHER FLUORIDE-CONTAINING COMPOUNDS USED TO TREAT COMMUNITY WATER SUPPLIES THAT SHOULD BE SPECIFICALLY IN THE REGULATION? IF SO, WHAT ARE THEY?

ANSWER TO QUESTION 2: NO.

I do not give permission for my personal details to be released to persons under the Official Information Act 1982.

Yours sincerely

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

Name: .

Email

Address:

**Your interest in this topic:**

Consumer.

**Question 1.** *Do you support the proposed amendment? If not why not?*

I do not support the proposed amendment because fluoride does not treat water but is targeted at treating disease dental cavities, and therefore it should be classified as a medicine. I wish to maintain my and my children's freedom of choice to have or not have fluoride, and addition of it to the water supply would remove that freedom.

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

No. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people.

I do not wish to speak to my submission.

I do give permission for my personal details to be released to persons under the Official Information Act 1982







**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

askmedsafe

06/01/2015 08:57 a.m.

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History: This message has been replied to.

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Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

I do / do not (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that:  
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email: \_\_\_\_\_

Address \_\_\_\_\_

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
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NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

--



# Auckland Regional Public Health Service

Rātonga Hauora ā Iwi o Tamaki Makaurau



Working with the people of Auckland, Waitemata and Counties Manukau

Auckland Regional Public Health Service  
Cornwall Complex  
Floor 2, Building 15  
Greenlane Clinical Centre  
Private Bag 92 605  
Symonds Street  
Auckland 1150  
New Zealand  
Telephone: 09-623 4600  
Facsimile: 09-623 4633

Regulations under the Medicines Act 1981 Consultation  
Medsafe  
Clinical Leadership Protection & Regulation  
Ministry of Health  
PO Box 5013  
Wellington 6145

## Proposed Amendment to Medicines Regulations Concerning Status of Fluoride-Containing Substances Used for Drinking Water Fluoridation

Thank you for the opportunity to comment on the proposed amendment. Please find our completed submission form attached.

The primary contact point for this submission is:

Dr Richard Hoskins  
Medical Officer of Health  
Auckland Regional Public Health Service  
Private Bag 92 605  
Symonds Street  
Auckland 1150

Telephone: 09 623 4600  
Email: [rhoskins@adhb.govt.nz](mailto:rhoskins@adhb.govt.nz)

Yours faithfully

Dr Richard Hoskins  
Medical Officer of Health

Sunil Kushor  
Acting Service Manager

## **SUBMISSION FORM**

Please provide your contact details below. You may also wish to use this form to comment on the proposed amendment.

|                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name:                                                                                                                                                                                       | Richard Hoskins                                                                                                                                                                                                                                                                                                                                                    |
| If this submission is made on behalf of an organisation, please name that organisation here:                                                                                                | Auckland Regional Public Health Service (ARPHS).                                                                                                                                                                                                                                                                                                                   |
| Please provide a brief description of the organisation if applicable:                                                                                                                       | Auckland Regional Public Health Service (ARPHS) is the regional public health service for Auckland. ARPHS operates the Drinking Water Assessment Unit for the Auckland region                                                                                                                                                                                      |
| Address/email:                                                                                                                                                                              | <i>Postal address:</i><br><br>Auckland Regional Public Health Service<br>Private Bag 92605<br>Symonds Street<br>Auckland 1150                                                                                                                                                                                                                                      |
| Your interest in this topic (for example, local body, consumer, manufacturer, health professional etc):                                                                                     | ARPHS interest in this proposal relates to our role and duties as a public health unit. We seek to reduce the burden of disease related to poor dental health.                                                                                                                                                                                                     |
| <b>Question 1</b><br><i>Do you support the proposed amendment? If not, why not?</i>                                                                                                         | Auckland Regional Public Health Service (ARPHS) supports the proposed amendment. The status of fluoride-containing substances requires clarification, as recommended by the High Court in <i>New Health NZ Inc v Attorney General</i> (2014 NZHC 2487).<br><br>ARPHS agrees with and supports the Ministry of Health's position on fluoridation of water supplies. |
| <b>Question 2</b><br><i>Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?</i> | ARPHS is not aware of other fluoride-containing materials which could be used for water fluoridation, but the regulation needs to be worded in such a way as to allow suitable alternatives to be used.                                                                                                                                                            |

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Fluoride

to: askmedsafe@  
moh.govt.nz

06/01/2015 09:13 a.m.

C

History: This message has been replied to.

---

Dear Medsafe

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QUESTION 1: DO YOU SUPPORT THE PROPOSED AMENDMENT? IF NOT, WHY NOT?

ANSWER TO QUESTION 1

I oppose the proposed amendment for the following reasons:

- 1 = No Regulation should be made exempting HFA and SSF from being medicines until the Court of Appeal has determined whether or not HFA and SSF are medicines under the Medicines Act.
- 2 = If HFA and SSF are medicines they should not be exempt from the Medicines Act.
- 3 = If HFA and SSF are not medicines there is no need for the exemption.
- 4 = The Medicines Act is designed to ensure the safety, quality and efficacy of medicines. HFA and SSF should be subject to these controls.
- 5 = These controls will ensure that people are not exposed to uncontrolled doses of fluoride from an industrial grade and heavy-metal contaminated fluoride substance.
- 6 = If fluoride tablets are not recommended for babies, toddlers and pregnant women, these sub-populations should not be ingesting fluoridated water.
- 7 = No protection against dental decay is provided by swallowing fluoride; consequently HFA and SSF should not be swallowed.
- 8 = Those people who believe there is a benefit in ingesting fluoride can buy sodium fluoride tablets from a pharmacy.

QUESTION 2: ARE THERE ANY OTHER FLUORIDE-CONTAINING COMPOUNDS USED TO TREAT COMMUNITY WATER SUPPLIES THAT SHOULD BE SPECIFICALLY IN THE REGULATION? IF SO, WHAT ARE THEY?

ANSWER TO QUESTION 2: NO.

I do not give permission for my personal details to be released to persons under the Official Information Act 1982.

Yours sincerely



## SUBMISSION FORM

Please provide your contact details below. You may also wish to use this form to comment on the proposed amendment.

|                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name:                                                                                                                                                                                                  | I                                                                                                                                                                                                                                                                                |
| If this submission is made on behalf of an organisation, please name that organisation here:                                                                                                           | Democrats for Social Credit                                                                                                                                                                                                                                                      |
| Please provide a brief description of the organisation if applicable:                                                                                                                                  | Political party                                                                                                                                                                                                                                                                  |
| Address/email:                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                  |
| Your interest in this topic (for example, local body, consumer, manufacturer, health professional etc):                                                                                                | Consumer                                                                                                                                                                                                                                                                         |
| <p><b>Question 1</b></p> <p><i>Do you support the proposed amendment? If not, why not?</i></p>                                                                                                         | <p>NO - I do NOT support the amendment. I do NOT think it is right to exempt fluoride as a medication, just for the sake of convenience. It isn't a water treatment like chlorine, it is used to treat people. Populations should not be mass medicated with this substance.</p> |
| <p><b>Question 2</b></p> <p><i>Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?</i></p> | <p>NO - All fluoride compounds should be designated the same as any other poisonous or medical substance, and not exempted from regulation. Fluoride is used to treat people, not water.</p>                                                                                     |

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the Official Information Act 1982. If there is any part of your correspondence that you consider should be properly withheld under this legislation, please make this clear in your submission, noting the reasons why you would like the information to be withheld.

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fluoride

kmedsafe@moh.govt.nz'

06/01/2015 09:47 a.m.

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History:

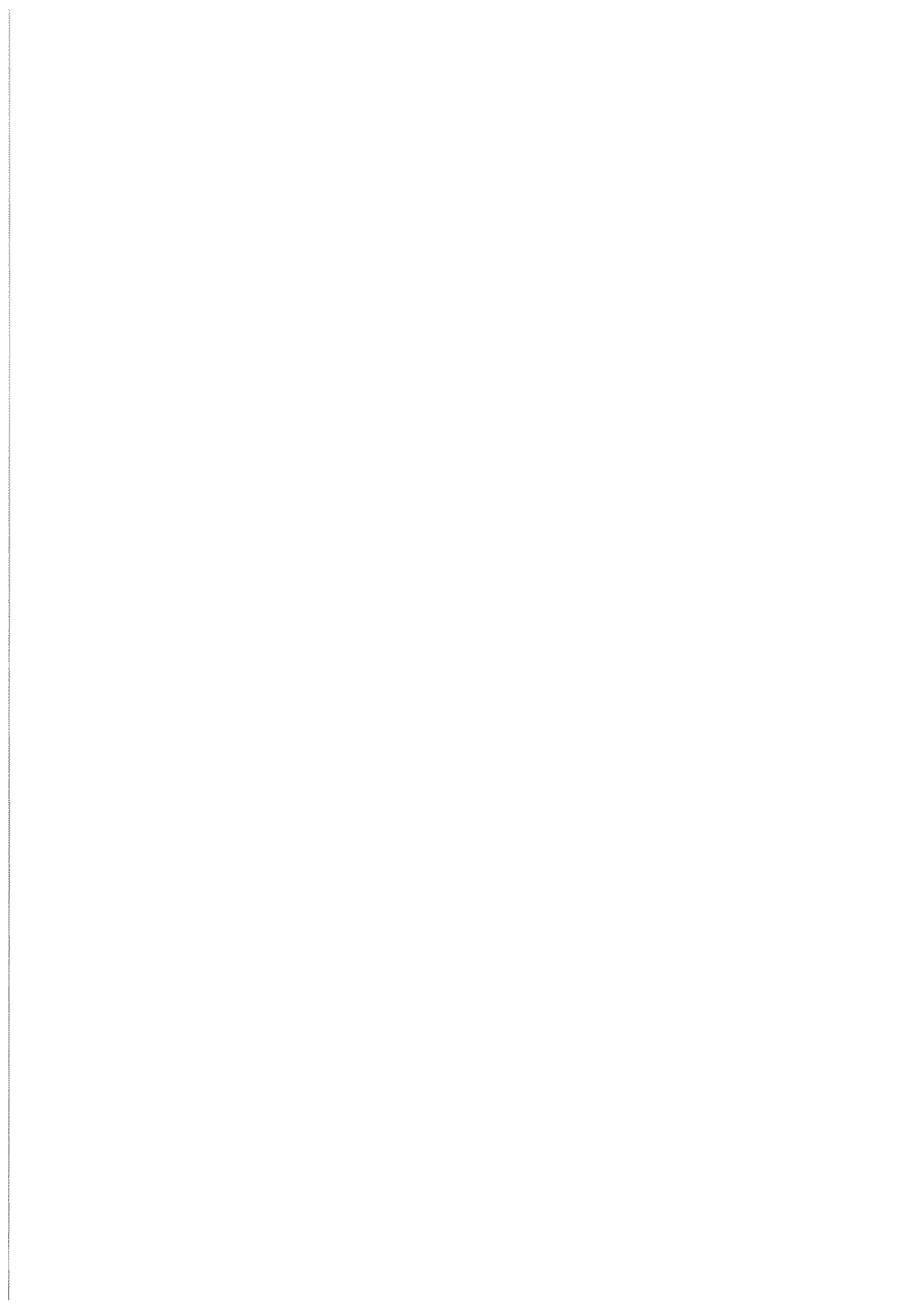
This message has been replied to.

To Whom it may concern,

I am an ex school dental nurse strongly against fluoride (as you call it) being added to water supplies. Councils have neither the knowledge nor the mandate to put this into drinking water. The idea that what is added to water can fight dental caries is ludicrous, with the amount of sugar being consumed. Oral hygiene and diet are to be promoted.

This "fluoridation" scheme is going to impact on other health areas, please reconsider your stance.

{  
|





??? FLUORIDE IN WATER.

j : askmedsafe

06/01/2015 10:01 a.m.

From: "

To: <askmedsafe@moh.govt.nz>

History: This message has been replied to.

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NAME: .

ADDRESS :

EMAIL : \_\_\_\_\_

Question 1. Do I support addition of Fluoride to our water ?

Answer : NO I DO NOT !!!!!

WHY? Where does the additions stop. AND the same chemical is an addition to Toothpaste, which we are advised on labels NOT to swallow.

;





History: This message has been replied to.

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

I do give permission for my personal details to be released to persons under the Official Information Act 1982

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:**

**Address:**

**I do not support the proposed amendment because:**

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people







**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

skmedsafe@moh.govt.nz

06/01/2015 10:27 a.m.

History: This message has been replied to.

*I do give permission for my personal details to be released to persons under the Official Information Act 1982*

**Submission to Consultation on Proposed Amendment to Regulations under the  
Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that:  
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**Nan**

**Emai**

**Address**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
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**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do wish to speak to my submission.*

Regards

**Post to:**  
Regulations under the Medicines Act 1981 Consultation  
Medsafe  
Clinical Leadership Protection & Regulation  
Ministry of Health  
PO Box 5013  
Wellington 6145

**Email to:** *askmedsafe@moh.govt.nz*



## submission to consultation on proposed amendment

:medsafe

06/01/2015 11:15 a.m.

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History: This message has been replied to.

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Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

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“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name:

Email:

Address:

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people.

Regards.





**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

: askmedsafe@moh.govt.nz

06/01/2015 11:42 a.m.

Please respond to

---

History: This message has been replied to.

---

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 –  
Fluoride (2014)**

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that:

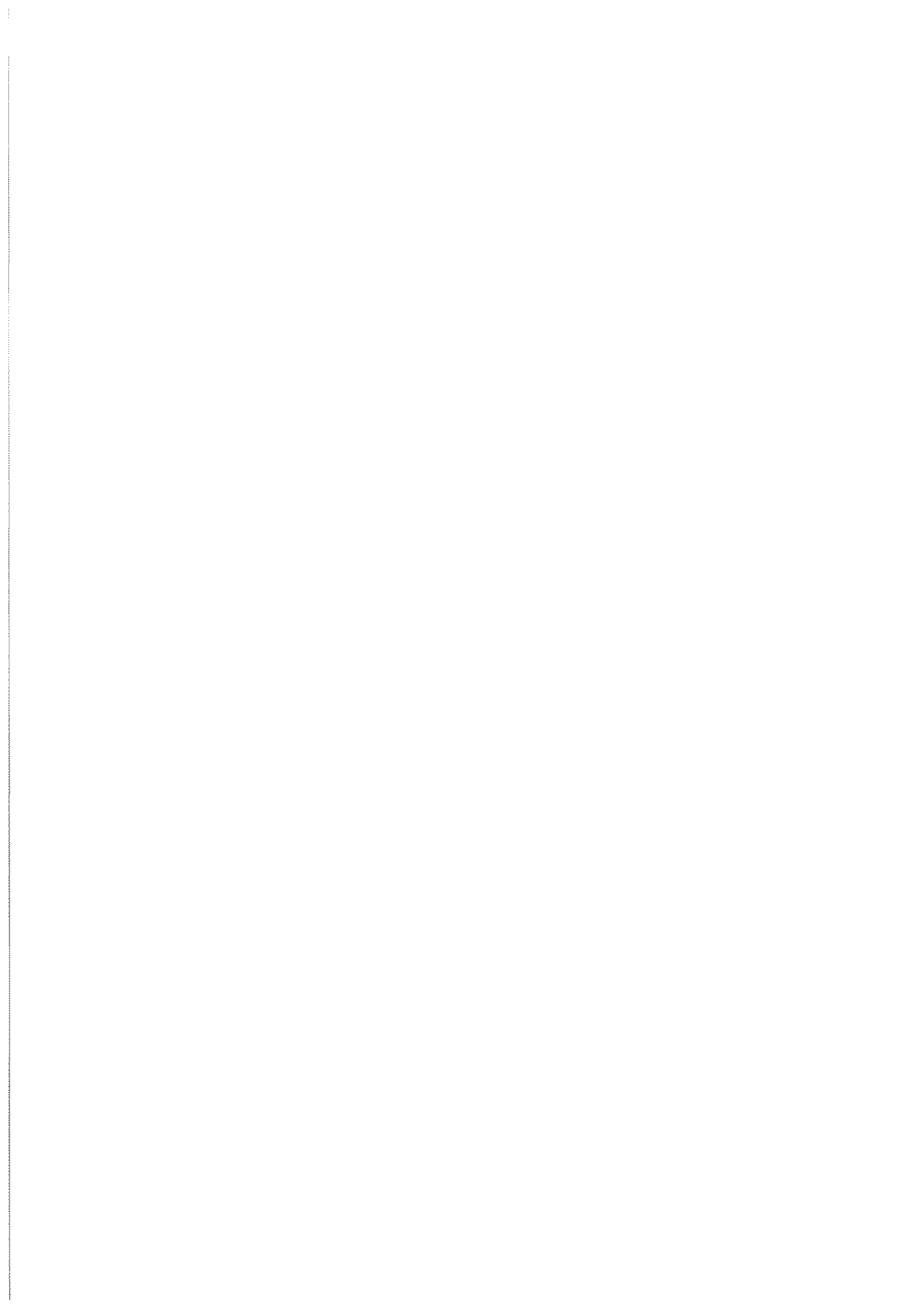
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

**Name:**

**Email**

**Address:**

1. I do not support the proposed amendment because:
  1. Fluoride is not a water treatment like chlorine
  2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
  - 3.. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
  4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines
2. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people





Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)

skmedsafe

06/01/2015 12:19 p.m.

History: This message has been replied to.

**Submission to Consultation on Proposed Amendment to Regulations under the  
Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that:  
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and  
sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are  
manufactured and supplied or distributed for the purpose of fluoridating community water  
supplies.” Medsafe

**Name:** §

**Email:**

**Address:** 1

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I DO NOT support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines
5. The district and regional authorities in my area have not demonstrated publically or to me personally by any means - despite being asked - the safety of fluoride in drinking water, other than by a selective reference to some research and authorities to support their position and intentions. They have not wished to engage in debate on the full spectrum of scientific evidence, other than to hold fora where points of view are presented but not substantiated.

Moreover, the South Taranaki District Council when specifically asked agreed that not one of their number was medically trained or qualified to understand or explain the scientific literature, and only one Councillor claimed any scientific credentials enabling him to understand the scientific literature pertinent to the debate.

Thus, by their own admission, they are unable to justify the addition of fluoride to STDC water supplies. Removal of fluoride from the Medicines Act therefore validates and enables the incompetent position of the STDC, to which I object most strongly.

**Question 2.** *Are there other fluoride-containing compounds used to treat community water*

*supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to **'treat'** community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**. Therefore, by definition, it is used as a form of medication and thus should not be removed from the Medicines Act, by way of exemption.

*I DO wish to speak to my submission.*

Thank you most sincerely for the opportunity to make this submission.

Your happy and blessed servant

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## SUBMISSION FORM

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

### **Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:**

**Address**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not wish to speak regarding my submission.*





Fluoride

askmedsafe@moh.govt.nz

06/01/2015 01:48 p.m.

Please respond

History: This message has been replied to.

Dear Medsafe

SUBMISSION ON PROPOSAL THAT HFA AND SSF ARE NOT MEDICINES FOR THE PURPOSES OF THE MEDICINES ACT WHEN THEY ARE MANUFACTURED AND SUPPLIED OR DISTRIBUTED FOR THE PURPOSE OF FLUORIDATING COMMUNITY WATER SUPPLIES

QUESTION 1: DO YOU SUPPORT THE PROPOSED AMENDMENT? IF NOT, WHY NOT?

ANSWER TO QUESTION 1

I oppose the proposed amendment for the following reasons:

1 = No Regulation should be made exempting HFA and SSF from being medicines until the Court of Appeal has determined whether or not HFA and SSF are medicines under the Medicines Act.

2 = If HFA and SSF are medicines they should not be exempt from the Medicines Act.

3 = If HFA and SSF are not medicines there is no need for the exemption.

4 = The Medicines Act is designed to ensure the safety, quality and efficacy of medicines. HFA and SSF should be subject to these controls.

5 = These controls will ensure that people are not exposed to uncontrolled doses of fluoride from an industrial grade and heavy-metal contaminated fluoride substance.

6 = If fluoride tablets are not recommended for babies, toddlers and pregnant women, these sub-populations should not be ingesting fluoridated water.

7 = No protection against dental decay is provided by swallowing fluoride; consequently HFA and SSF should not be swallowed.

8 = Those people who believe there is a benefit in ingesting fluoride can buy sodium fluoride tablets from a pharmacy.

QUESTION 2: ARE THERE ANY OTHER FLUORIDE-CONTAINING COMPOUNDS USED TO TREAT COMMUNITY WATER SUPPLIES THAT SHOULD BE SPECIFICALLY IN THE REGULATION? IF SO, WHAT ARE THEY?

ANSWER TO QUESTION 2: NO.

I do not give permission for my personal details to be released to persons under the Official Information Act 1982.

Yours sincerely





**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

o: askmedsafe@moh.govt.nz

06/01/2015 02:17 p.m.

History:

This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

I **do not** give permission for my personal details to be released to persons under the Official Information Act 1982

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name:

Email: \_\_\_\_\_

Address:

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people.



723  
Submission  
over page



**Re: URGENT -Submissions required before 9 January 2015**

to: askmedsafe

06/01/2015 02:52 p.m.

Please respond to

History: This message has been replied to.

**From:** J

**Sent:** Monday, January 5, 2015 8:36 PM

**Subject:** URGENT -Submissions required before 9 January 2015

Dear All,

I am forwarding this notice again to remind those who have not had the opportunity to make their submission to please ensure you have your say.

I have been lead to believe that this potential law change in regards to exempting fluoride substances from the Medicines Act can open the door and allow government to have "any substance" put in our drinking water.

Please feel free to send this email to all your contacts.

vice President

**MESSAGE FOLLOWS:-**

**Fluoride Free NZ**

Submissions close this Friday. Get your submission in today!

The New Zealand Government has announced that it is taking public submissions on a pending application to exempt fluoridation chemicals (HFA and SSF) from the New Zealand Medicine's Act, even though their sole stated purpose is to treat people to prevent dental decay. Closing date is the 9th January 2015.

<http://www.medsafe.govt.nz/.../medicine-regulations-fluoride-...>

See submission form below

The Ministry of Health will consider feedback from submitters early in the New Year. A final decision on the proposed amendment is likely to be taken in late January or early February 2015, following consideration by the Minister and Cabinet. If approved, the new regulation is likely to come into force in February or March 2015.

We URGENTLY need many professionals and members of the NZ AND INTERNATIONAL public to write submissions saying why fluoride should NOT be allowed an exemption under NZ law.

You can write as much or as little as you like. It would be very helpful to include professional qualifications and background, if applicable. If you wish to speak or present supporting information to your submission, it is important to include that request in your written submission. They may hold hearings if enough people request speaking or presentation time.

This has come about as a result of a Judicial Review against the Ministry of Health in November 2014.

<http://www.bellgully.co.nz/.../New-Health-v-A-G-2014-NZHC-248...>

The most shocking thing is that in his judgement, Justice David Collins intervened and advised the Ministry of Health's legal team to apply for this exemption for fluoride in water supplies! Exempting fluoride in water supplies would be unprecedented. As yet, no exemptions have been issued for ingested substances, so if this exemption is granted, fluoride would be the first. This could close the door to planned future legal challenges on fluoridation in New Zealand.

We would appreciate your help very much, and would be grateful if you could please forward this request to your networks. If you are pressed for time in this busy Xmas season, we have supplied an easy submission template below which can be copied and pasted, emailed or posted before 9th January 2015.

It can also be printed out and duplicated for public distribution in any way you see fit.

#### SUBMISSION FORM

I do / do not (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email:

Address:

Question 1. Do you support the proposed amendment? If not why not? No I do not support the amendment. Council should not have the ability to add anything to the water.

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

No Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

No I understand these are not used to treat the water, but to treat humans. It can have very adverse effects.

I do / do not (delete whichever does not apply) wish to speak to my submission.

I do not wish to speak to my submission.

Postto:

Regulations under the Medicines Act 1981 Consultation

Medsafe

Clinical Leadership Protection & Regulation





Re: Anti Fluoride Submission

From: askmedsafe

06/01/2015 02:56 p.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name:

Email:

Address:

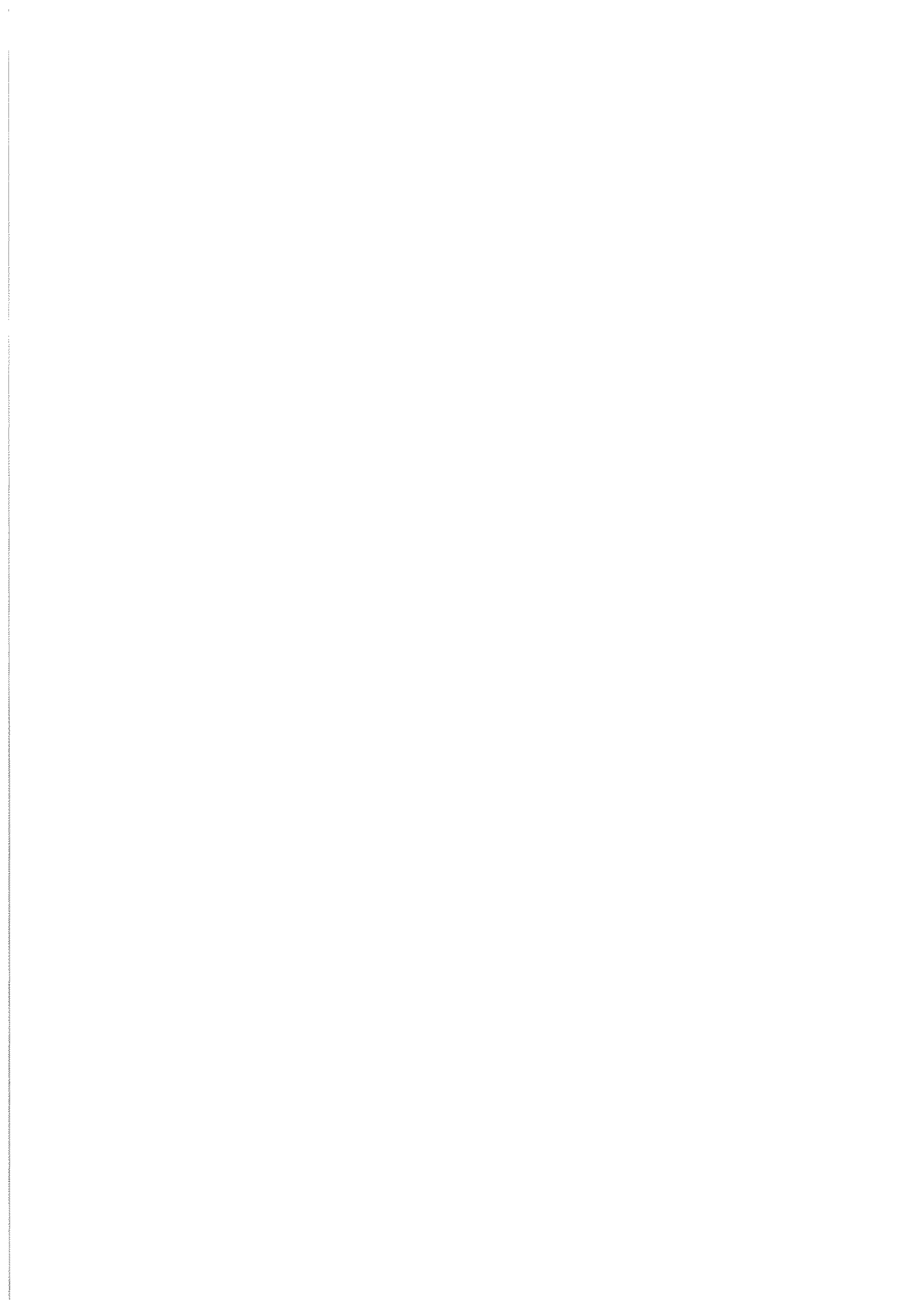
Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

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Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people



## SUBMISSION FORM

Please provide your contact details below. You may also wish to use this form to comment on the proposed amendment.

|                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name:                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| If this submission is made on behalf of an organisation, please name that organisation here:            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Please provide a brief description of the organisation if applicable:                                   | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Address/email:                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Your interest in this topic (for example, local body, consumer, manufacturer, health professional etc): | Citizen and consumer of community drinking water                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>Question 1</b></p> <p><i>Do you support the proposed amendment? If not, why not?</i></p>          | <p>Yes.</p> <p>It would be straining the natural usage of the word "medicine" to apply it to the addition of fluoride to community drinking water supplies.</p> <p>It is likely that you will receive many submissions raising issues of consent. Consent comes through the ability for local communities to decide themselves whether to add fluoride. Individuals can withhold consent by opting not to drink the community drinking water, or through treatment of the water to remove the added fluoride.</p> |
| <p><b>Question 2</b></p> <p><i>Are there other fluoride-containing</i></p>                              | None that I'm aware of.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                                                                                                    |  |
|------------------------------------------------------------------------------------------------------------------------------------|--|
| <i>compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?</i> |  |
|------------------------------------------------------------------------------------------------------------------------------------|--|

Please note that all correspondence may be requested by any member of the public under the Official Information Act 1982. If there is any part of your correspondence that you consider should be properly withheld under this legislation, please make this clear in your submission, noting the reasons why you would like the information to be withheld.

If information from your submission is requested under the Act, the Ministry of Health will release your submission to the person who requested it. However, if you are an individual, rather than an organisation, the Ministry will remove your personal details from the submission if you check the following box:

- I **do not** give permission for my personal details to be released to persons under the Official Information Act 1982.

All submissions will be acknowledged, and a summary of submissions will be sent to those who request a copy. The summary will include the names of all those who made a submission. In the case of individuals who withhold permission to release personal details, the name of the organisation will be given if supplied.



**SUBMISSION FORM..**

askmedsafe

06/01/2015 03:27 p.m.

History: This message has been replied to.

SUBMISSION FORM....

I ~~do~~ / do not (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

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Name:  
Email:  
Address:

Question 1. Do you support the proposed amendment? If not why not?

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I do / ~~do not~~ wish to speak to my submission.

Post to:  
Regulations under the Medicines Act 1981 Consultation  
Medsafe  
Clinical Leadership Protection & Regulation

Ministry of Health  
PO Box 5013  
Wellington 6145

Dear All,

I am forwarding this notice again to remind those who have not had the opportunity to make their submission to please ensure you have your say.

I have been lead to believe that this potential law change in regards to exempting fluoride substances from the Medicines Act can open the door and allow government to have "any substance" put in our drinking water.

Please feel free to send this email to all your contacts.

Kind regards,

Vice President

**MESSAGE FOLLOWS:-**

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See submission form below

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**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:** |

**Address:**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride should be considered a medicine as if its put into drinking water supplies to improve dental health then it is a medicine not a way to make water safe to drink – in fact it's the opposite, in my opinion it would no longer be safe to drink.
3. The Medicines Act should be preventing mass medication without people's consent.
4. There are cheap alternatives which would precisely target those at risk of dental decay (eg flouride tablets), while not dosing the significant portion of the population who would no longer benefit or who don't want to ingest it.

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to 'treat' community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not (delete whichever does not apply) wish to speak to my submission.*







fluoride

skmedsafe

06/01/2015 04:07 p.m.

History:

This message has been replied to.

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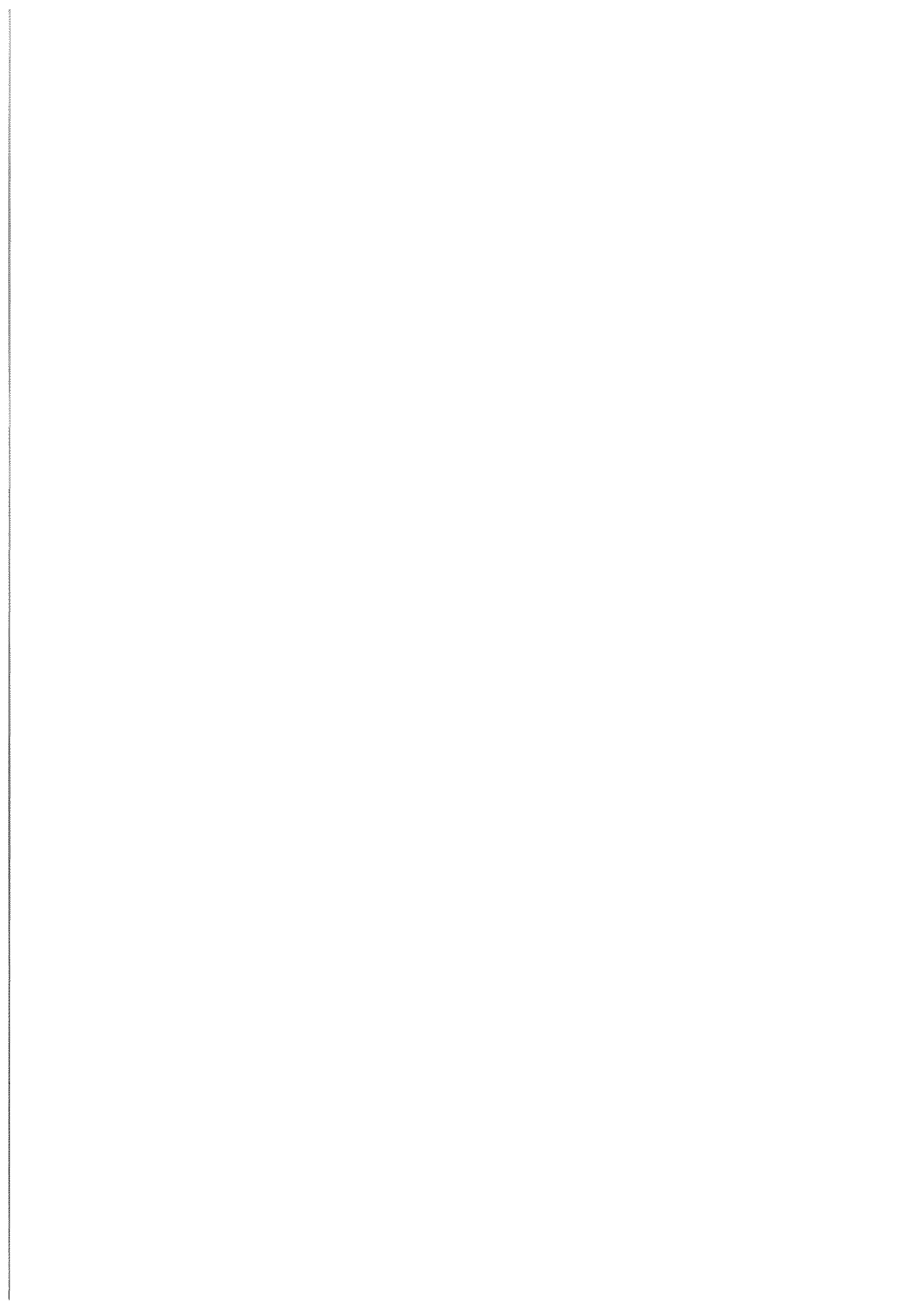
SUBMISSION TO 'Regulations under the Medicines Act 1981 Consultation' by Medsafe, Ministry of Health

Q1: I support the proposed changes to clarify that -  
Fluoride-containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purposes of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.

Q2: Not that I am aware of.

Thank you for considering my submission.

Yours sincerely





Rotorua water

: askmedsafe

06/01/2015 04:22 p.m.

History: This message has been replied to.

Regulations under the Medicines Act 1981 Consultation

Medsafe

Clinical Leadership Protection & Regulation

Ministry of Health

PO Box 5013

Wellington 6145

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

“It is proposed that a new regulation be made under section 105(1)(i) that:

Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name

Email:

Address:

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
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Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

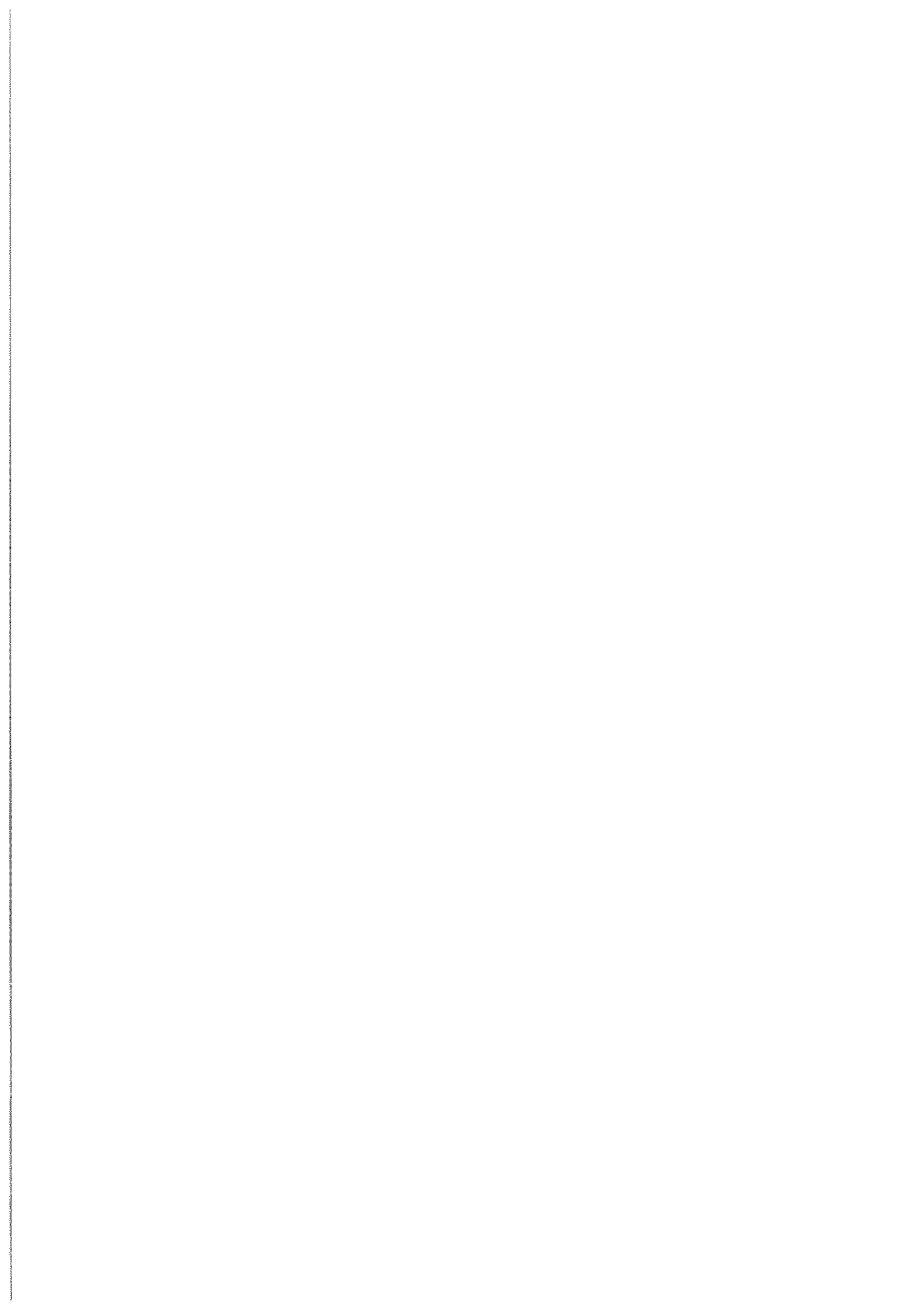
NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

Share

Twitter

Email

Discussion





**Fwd: Submission re: Fluoride in water supplies.**

to: askmedsafe

06/01/2015 04:23 p.m.

Sent by:

Please respond

History: This message has been replied to.

----- Message Forwarded on Tue 6/1/2015 -----

I am very concerned about the Govt allowing Fluoride to be exempt from legal action by citizens in regards to it being added to the community's water supply! I personally do not think it should be added by municipal authorities at all for the sake of the protection of the people's health because of it's side effects and other reasons mentioned below. If people want to use fluoride for their own health use, they can add it to their water themselves. If the govt is concerned about dental cavities, then they should limit and tax sugar in soft drinks and other foods, to help pay for the damage too much sugar causes in the diet to the consumer, which has been well-evidenced in research now, and would help with the obesity and diabetes crisis our people are now experiencing.

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

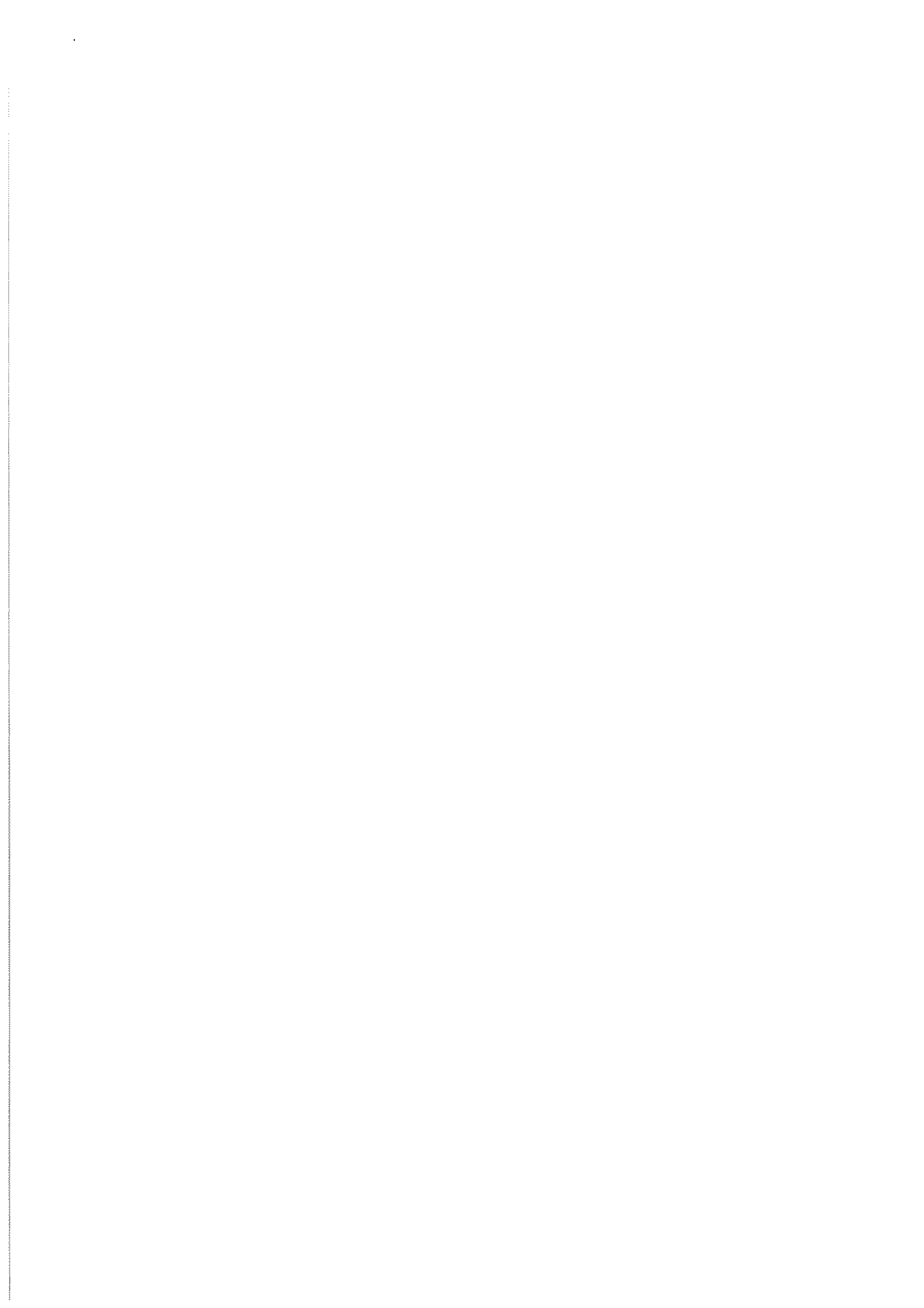
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2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
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NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people.

Yours Sincerely.

Email to: askmedsafe@moh.govt.nz1





**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)**

askmedsafe

06/01/2015 06:16 p.m.

History: This message has been replied to.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that:

Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email:

Address:

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
- 3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
- 4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people





## SUBMISSION FORM

Please provide your contact details below. You may also wish to use this form to comment on the proposed amendment.

|                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name:                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| If this submission is made on behalf of an organisation, please name that organisation here:            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Please provide a brief description of the organisation if applicable:                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Address/email:                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Your interest in this topic (for example, local body, consumer, manufacturer, health professional etc): | Individual interest, on behalf of the general public.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Question 1</b></p> <p><i>Do you support the proposed amendment? If not, why not?</i></p>          | <p>No. I believe that the addition of HFA or similar to the public water supply in order to prevent and/or control dental caries, clearly constitutes medical treatment. No consent has been asked for or received, from any citizen, and therefore those who are opposed have been denied the right to choose whether or not to ingest this substance, unless they have the financial means to install a filter or buy water; a position which does not apply to the majority of families.</p> <p>The main cause of decay is sugar in food and drinks, and poor oral hygiene. Studies have shown that fluoridated water has a small effect in reducing cavity numbers when swallowed by people who consume higher amounts of sugar, but no effect on</p> |

|                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                        | <p>those who moderate their sugar intake. Children should be brushing their teeth after lunch at school, toothbrushes and paste should be subsidised by the government, and sugar-laden food and drink should be heavily taxed out of the reach of people on lower incomes, who are currently those most at risk. This would not only save the money now spent on CWF, but would help reduce the diabetes and obesity epidemic in NZ.</p> <p>It is quite ridiculous to continue to support the double standard that says when water containing a certain concentration of fluoride ions is drunk out of a tap, the substance used to fluoridate the water is not a medicine, yet when drinking a bottle in which a fluoride tablet has been dissolved is drunk, at the exact same concentration, the tablet is classed as a medicine.</p> |
| <p><b>Question 2</b></p> <p><i>Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?</i></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

Please note that all correspondence may be requested by any member of the public under the Official Information Act 1982. If there is any part of your correspondence that you consider should be properly withheld under this legislation, please make this clear in your submission, noting the reasons why you would like the information to be withheld.

If information from your submission is requested under the Act, the Ministry of Health will release your submission to the person who requested it. However, if you are an individual, rather than an organisation, the Ministry will remove your personal details from the submission if you check the following box:

I **do not** give permission for my personal details to be released to persons under the Official Information Act 1982.

All submissions will be acknowledged, and a summary of submissions will be sent to those who request a copy. The summary will include the names of all those who made a submission. In the case of individuals who withhold permission to release personal details, the name of the organisation will be given if supplied.



## Regulations under the Medicines Act 1981 Consultation

From: askmedsafe

06/01/2015 09:33 p.m.

History:

This message has been replied to.

### To whom it may concern

### SUBMISSION FORM

I do (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

### **Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name

Email:

Address

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not (delete whichever does not apply) wish to speak to my submission*

Yours sincerely.



Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

to: askmedsafe

06/01/2015 09:41 p.m.

History:

This message has been replied to.

SUBMISSION FORM

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name:

Email:

Address:

As a New Zealand citizen currently living in HK, I would like the following answers recorded for this consultation.

Question 1. *Do you support the proposed amendment? If not why not?*

NO. I do not support the proposed amendment because:

- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
- 3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
- 4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

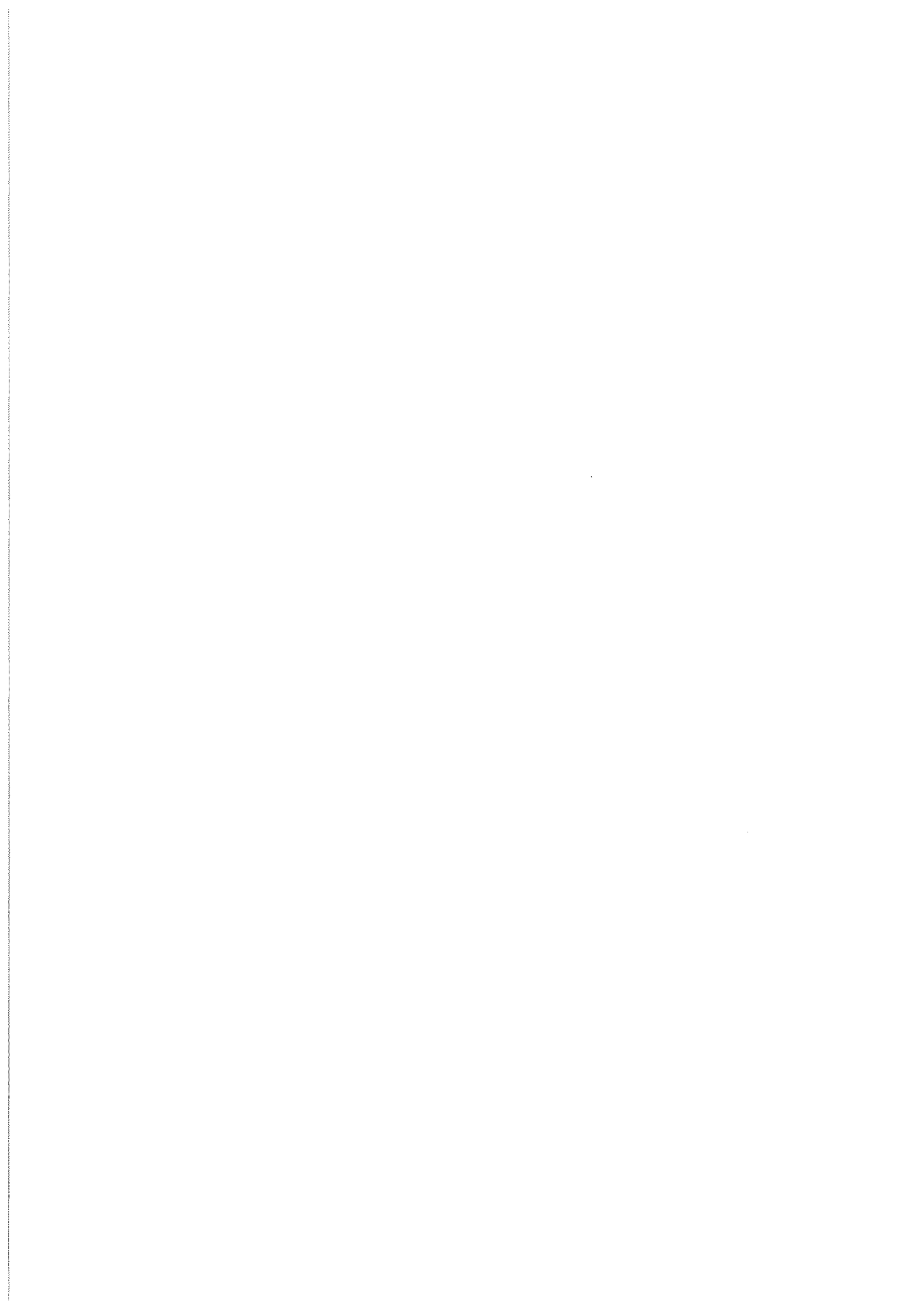
*I do not wish to speak to my submission.*

Regards

Mobile

Email

Web





**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

to: askmedsafe

06/01/2015 09:48 p.m.

History: This message has been replied to.

**SUBMISSION FORM**

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

**Submission to Consultation on Proposed Amendment to Regulations under the  
Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that:  
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:**

**Address:**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine. Please note Chlorine treats water supplied to the community.

whereas

2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine

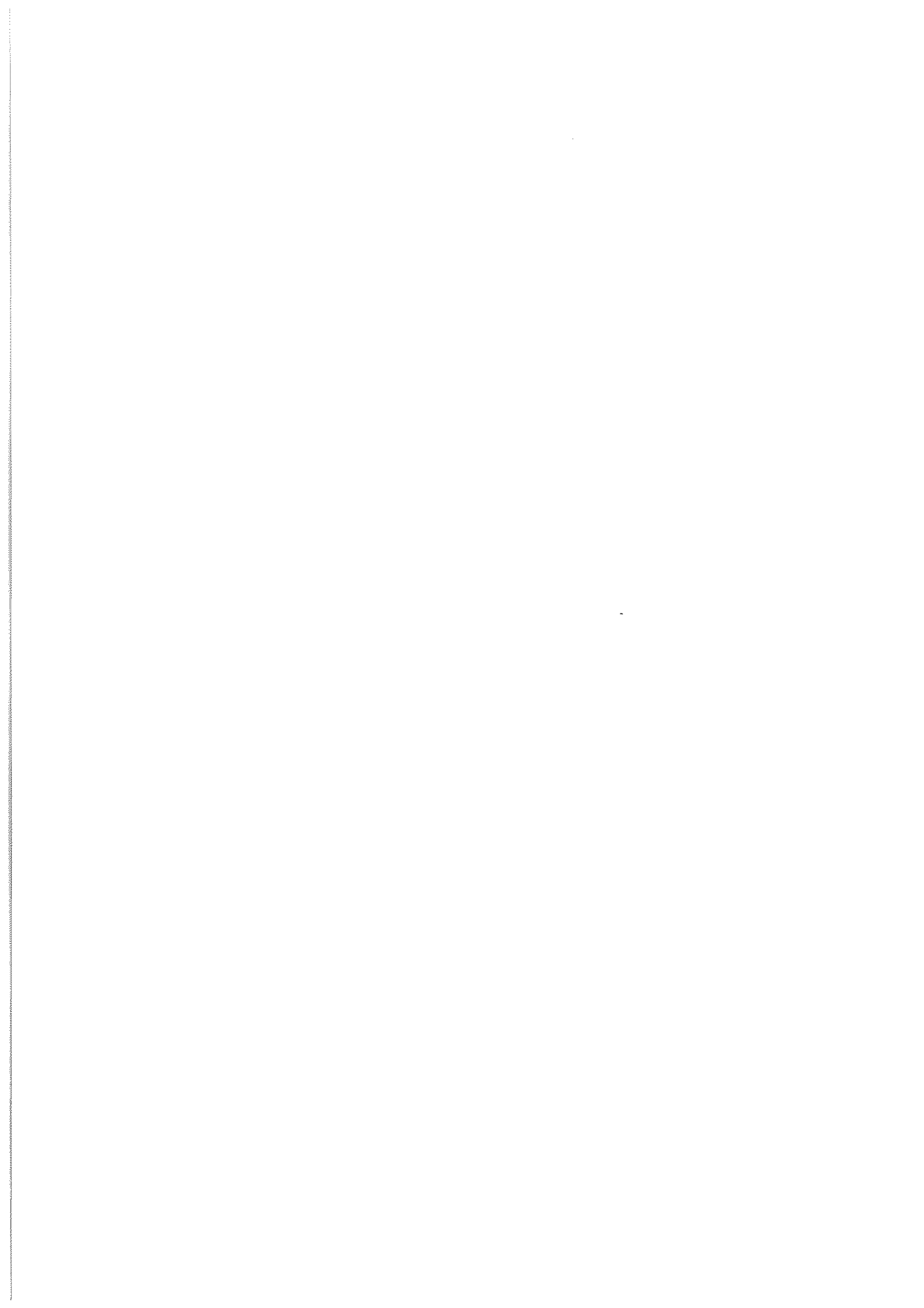
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines.

4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**.

*I do not wish to speak to my submission.*







**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

o: askmedsafe

06/01/2015 09:50 p.m.

History:

This message has been replied to.

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

**Submission to Consultation on Proposed Amendment to Regulations under the  
Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that:  
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:**

**Address:**

**Question 1.** *Do you support the proposed amendment? If not why not?*

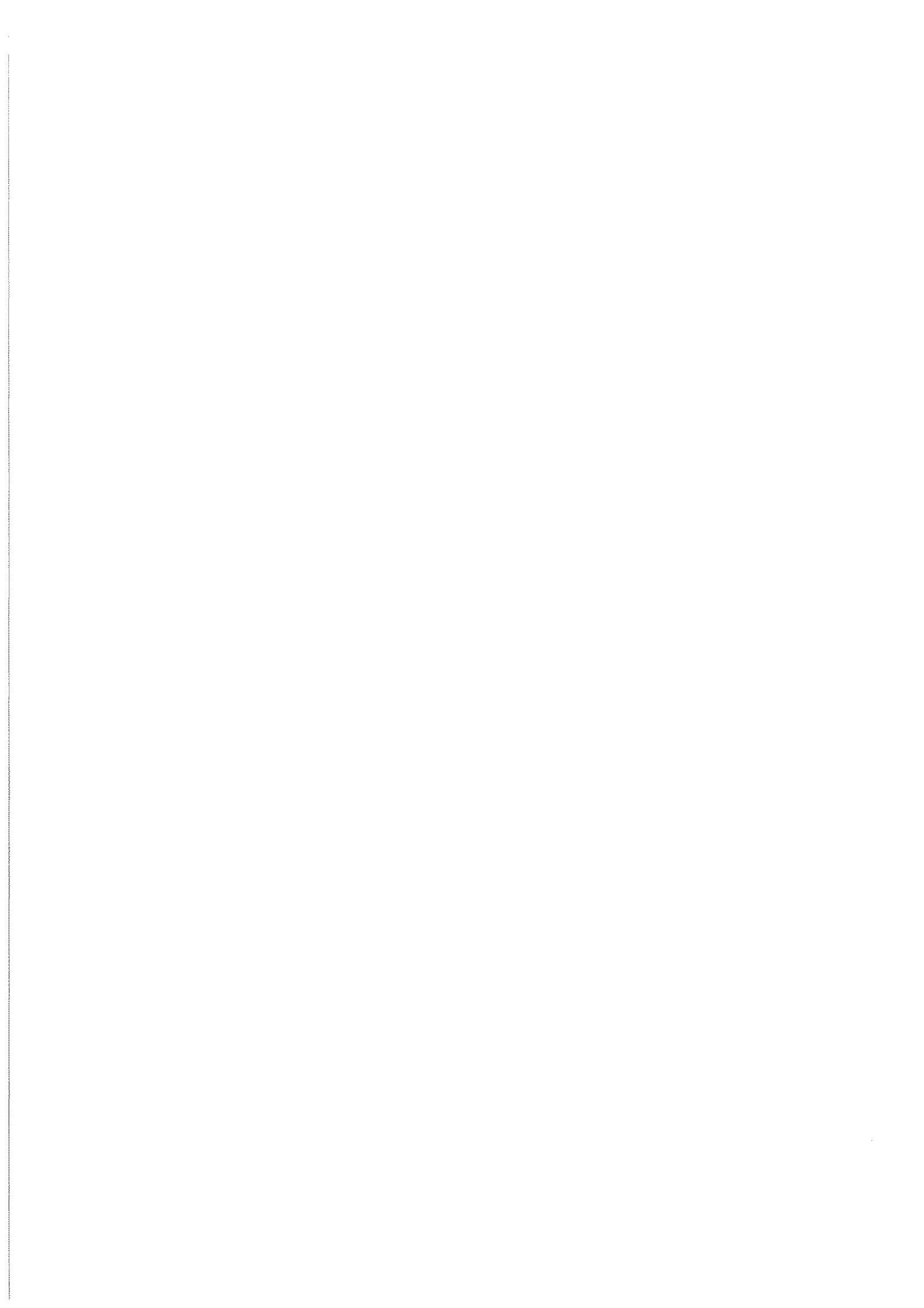
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1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines
5. I do not consent to the drinking water supplied to my family or I being used as a method of medication, irrespective of the efficacy of that medication

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘treat’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not wish to speak to my submission.*





## Fluoride (2014)

askmedsafe@moh.govt.nz

06/01/2015 09:50 p.m.

History: This message has been replied to.

### Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

Name:

Email:

Address: -

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people





**Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)**

o: askmedsafe

06/01/2015 09:55 p.m.

From:

To: askmedsafe@moh.govt.nz,

History: This message has been replied to.

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

**Submission to Consultation on Proposed Amendment to Regulations under the  
Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that:  
Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email**

**Address:**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
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**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**.

Yours Sincerely,

Cheers,





fluoride poison in drinking water a criminal act against NZ citizens

to: askmedsafe

06/01/2015 09:56 p.m.

History:

This message has been replied to.

Name: I

Email:

Address: ?

Question 1. Do you support the proposed amendment? If not why not?

NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

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NO. Fluoride and its compounds are **not** used to 'treat' community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not wish to speak to my submission.*

Post to:

Regulations under the Medicines Act 1981 Consultation  
 Medsafe  
 Clinical Leadership Protection & Regulation  
 Ministry of Health  
 PO Box 5013  
 Wellington 6145

Email to: [askmedsafe@moh.govt.nz](mailto:askmedsafe@moh.govt.nz)







Submission to Consultation on Proposed Amendment to Regulations  
under the Medicines Act 1981 - Fluoride (2014)

askmedsafe

06/01/2015 10:02 p.m.

History:

This message has been replied to.

SUBMISSION FORM

I do not give permission for my personal details to be released to persons under the Official Information Act 1982.

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

“It is proposed that a new regulation be made under section 105(1)(i) that:

Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Question 1. *Do you support the proposed amendment? If not why not?*

NO. I do not support the proposed amendment because:

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2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

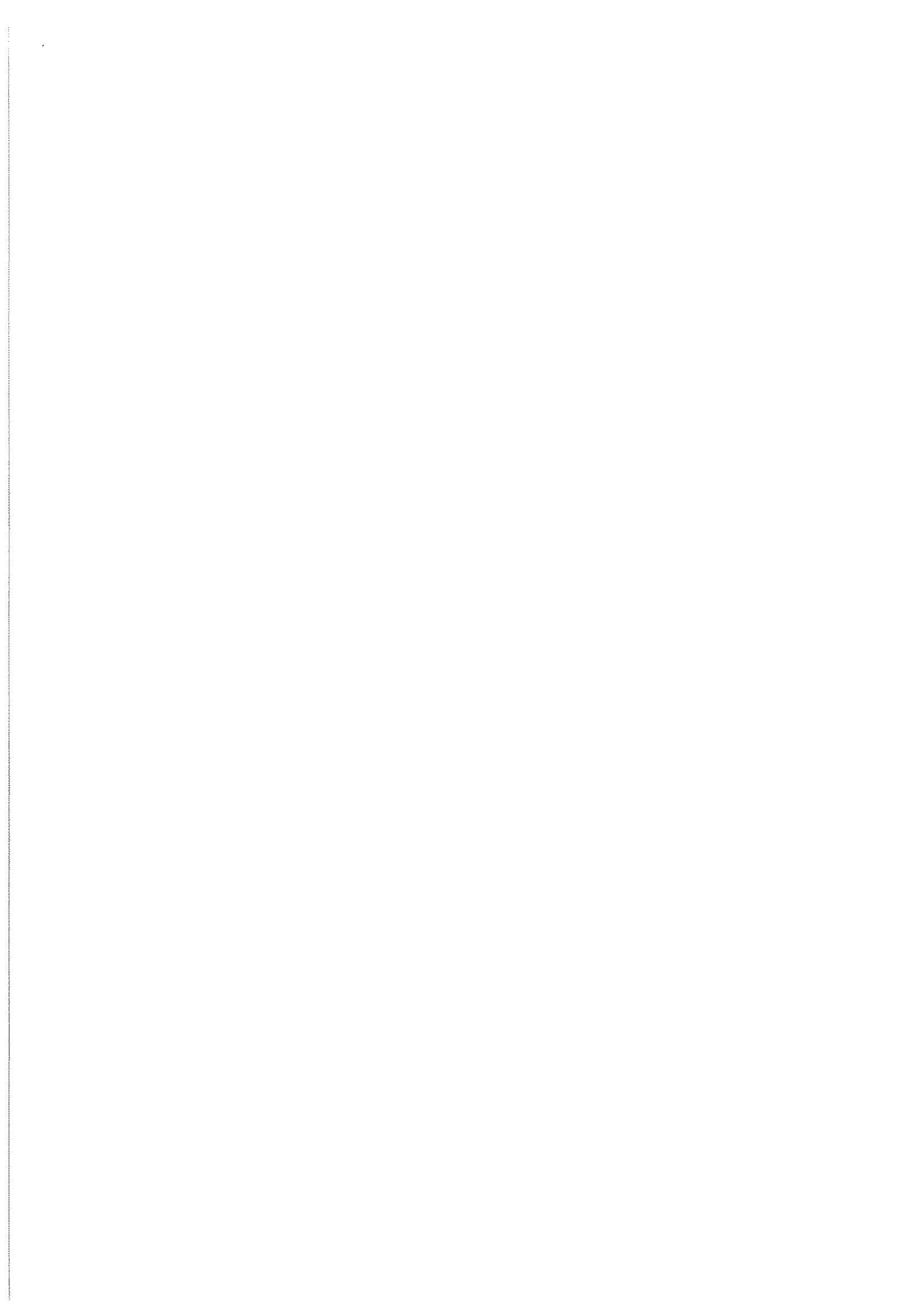
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NO. Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

*I do not wish to speak on my submission.*

*Thank you.*

--





Fluoride

to: askmedsafe

06/01/2015 10:04 p.m.

History: This message has been replied to.

Regulations under the Medicines Act 1981 Consultation

Medsafe

Clinical Leadership Protection & Regulation

Ministry of Health by E-mail

**Submission on proposed amendment of Regulations under the Medicine Act.**

I object to the proposed amendment.

In order to make clear my reasons for this objection I state the following points:

1. Adding a substance to people's drinking water is a grave interference with people's personal freedom of choice. It becomes very difficult for a person to avoid ingesting the fluor compound since water is such a basic need. Chlorination is different in the sense that the effect there of can be relatively easily made undone in the water, for instance by exposing it to sunlight for some time.
2. Making legislation which states that 'fluoridation is not a way of medication' does not provide greater clarity about the issue, since none of the controversies on what represents 'good science' will be resolved. The proposal merely gives the authorities a formal handle (power lever) to negate opponent's arguments. In a healthy society citizens must have the right to be informed with the outcome of an open debate.
3. Making legislation that determines that fluoridation is no medication will not bring about that fluoridation is no medication. This proposed law change is not based on an attempt to find a real truth, which would more likely be found in fundamental approach. It will be a law change achieved by some form of consensus or perhaps strategic manoeuvring.
4. Irrespective of what fluoridation is called, it is an activity which has no relation with the primary purpose of providing safe drinking water.

Then, although the debate on fluoridation itself becomes secondary when the aspect of taking away people's individual freedom is recognised as **morally not justifiable infringement**, I add another three points on the practice of fluoridation:

5. Referring to the discussion paper of the Ministry: Not only 'positive' effects of fluoridation (to reduce dental decay) are disputed, there are also (the not mentioned) 'negative effects' (brittle bones a.o.) which remain disputed. Scientists offer different views. It becomes more and more evident in our society that scientists are not free. Studies and wording of the results are much dependent on the objectives of the commissioner / funder of the study. Scientists are under economic pressure since their livelihood depends on the approval of their funders; a point that is almost always ignored in disputes.
6. There are much more effective means to combat dental decay, such as – even for a layman evident – cutting the access to sugar and sugar drinks. For those who believe in fluoridation: make fluor tablets/ rinses available, thus respecting people's individual freedom of choice.
7. Fluoridation of drinking water is reported to have been used in Nazi concentration camps as a means to keep people docile and easier to control. This sort of control must be shunned in a free society. There may have been different compounds and concentrations used to what is proposed for NZ drinking water supplies. However, legal acceptance will set a precedent for a practice to accept addition of substances to water; additives which are not

serving the primary purpose (irrespective of whether these additions are **claimed** to be applied for positive results).

I appeal to you, members of the select committee to err on the side of caution and keep the doors in our society closed for this sort of practices.

*[Faint, illegible text]*

I do not wish to speak to this submission.

**Fluoride Exemption**

o: askmedsafe@moh.govt.nz

06/01/2015 10:06 p.m.

History:

This message has been replied to.

Regulations under the Medicines Act 1981 Consultation

Medsafe

Clinical Leadership Protection & Regulation

**Proposed Fluoride Exemption**

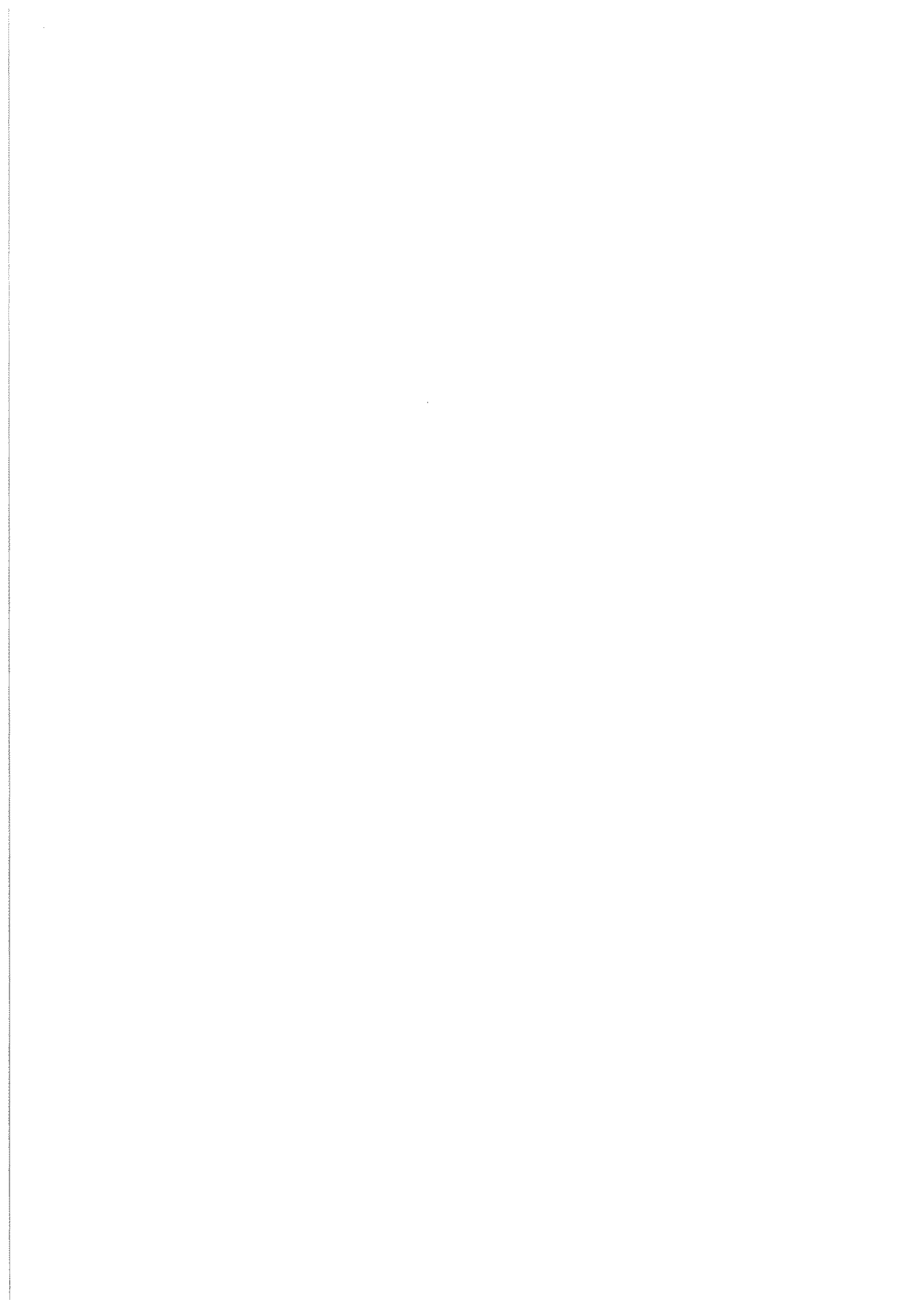
NO. I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to "first do no harm"
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

To give free reign to the addition of this toxin into OUR water supply is totally irresponsible of our governments health regulator. I am appalled and disgusted that they would even consider this. One fit doesn't fit all!!

Fluoride is added into water supply for the purposes of treating a disease and not to 'treat the water'... Long term studies HAVE NOT been done on the affects of this substance in individuals over a period of time. Consumption of this rubbish should be a personal choice AND NOT forced on all!

I do not wish to speak to my submission.



**SUBMISSION FORM**

I do not (delete whichever does not apply) give permission for my personal details to be released to persons under the Official Information Act 1982

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

**Name:**

**Email:**

**Address:**

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

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**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are not used to ‘treat’ community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to **treat people**

*I do wish to speak to my submission.*

**Post to:**

Regulations under the Medicines Act 1981 Consultation

Medsafe

Clinical Leadership Protection & Regulation

Ministry of Health

PO Box 5013

Wellington 6145







No Fluoride

to: askmedsafe@moh.govt.nz

06/01/2015 10:11 p.m.

History: This message has been replied to.

Question 1. Do you support the proposed amendment?  
If not why not?

NO. I do not support the proposed amendment for many many reasons – some are written below but be aware - this is a short list:

- 1. Fluoride is not a water treatment like chlorine
- 2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine – if it’s not a medicine, then what is it and why are you adding it to the water?
- 3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
- 4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

The chemicals used for artificial fluoridation of water are not the ones occurring naturally in water, however. In the United States, crystals of sodium fluoride or sodium fluorosilicate are usually used or the liquid fluorosilicic acid is added to the water to bring the fluoride content to the prescribed level of 1 ppm. These chemical byproducts of fertilizer industries and typically contain other industrial contaminants. If you wish to fluoridate the water (which I disagree with) you would have to use pharmaceutical grade fluoride or naturally occurring Fluoride compounds and certainly not a contaminated source.

**There is no evidence that fluoride is essential to human health.** To counteract iodine deficiency, which results in the disease goiter, iodine supplementation is practiced in areas with high incidence. While fluorosis caused by the excess of this chemical is prevalent in many areas of the world, there is **no such thing** as fluorine deficiency. Then what is the medical justification for treating a non-existent condition by mandatory supplementation?

**People have no choice over their water supply.** Water is an essential part of our diet. Many foods and beverages are often fortified with iron, calcium and other essential vitamins important for our overall health. However, in the case of fortified foods, people can choose not to buy that particular product. While they can avoid beverages like tea that typically contains high concentrations of fluoride, there is no escape from this chemical when it is in their drinking water. Water supply artificially laced with fluoride is like pouring unwanted chemicals down their throat.

**It’s impossible to keep the amount of fluoride consumption within range.** Since fluoride is not fully excreted, it can accumulate in the body over time, causing a chemical overload. People who typically consume large quantities of water and other water-based beverages would be at greater risk. For example, athletes generally drink lots of fluids to compensate for water loss during work outs, and people with medical conditions like diabetes and kidney stones are advised to drink plenty of water. Patients undergoing dialysis are particularly susceptible to F1 toxicity.

Infants fed on formula milk reconstituted with water from domestic supply inadvertently consume more fluoride than their breast-fed counterparts as breast milk contains negligible amounts of this element. The very fact that breast milk is low in fluoride precludes any health benefit the chemical is supposed to have. While fluoride toothpastes carry warnings against

using it with young children because of the risk of accidental ingestion, how many parents are sensitized to the risk of mixing infant formula with fluoridated water?

**The side effects of long-term consumption of fluoride has not been studied.** The crippling effects of fluoride over the threshold limit of 1-1.5 ppm are well known because many countries have this problem. But, how slow poisoning by water with lower levels of fluoride would affect the health of people is far from clear. Osteoporosis, arthritis and even cancer are cited as possible outcomes, but not with enough supporting data. Nevertheless, the line between the beneficial and detrimental levels of fluoride being so fine, there is room for legitimate concern regarding the safety of long-term use.

**Informed consent for ongoing experimentation** has not been obtained from all individuals within fluoridated communities; nor has consent been obtained from all individuals for the subsequent scientific research being conducted upon them. According to the Universal Declaration on Bioethics and Human Rights, "The interests and welfare of the individual should have priority over the sole interest of science or society" and, "In appropriate cases of research carried out on a group of persons or a community... In no case should a collective community agreement or the consent of a community leader or other authority substitute for an individual's informed consent"

#### **Adding Fluoride to Water Supplies:**

British Medical Journal - Ethical implications; Potential harms

*"Under the principle of informed consent, anyone can refuse treatment with a drug or other intervention. The Council of Europe Convention on Human Rights and Biomedicine 1997/19 states that **health interventions** can only be carried out **after free and informed consent**. The General Medical Council's guidance on consent also stresses patients' **autonomy**, and their **right to decide** whether or not to undergo medical intervention even if refusal may result in harm. **This is especially important for water fluoridation**, as an **uncontrollable dose of fluoride** would be given for **up to a lifetime**, regardless of the risk of caries, and many people would not benefit... In the case of fluoridation, people should be aware of the limitations of evidence about its **potential harms** and that it would be **almost impossible to detect small but important risks** (especially for chronic conditions) after introducing fluoridation."*

You absolutely DO NOT have my informed consent to fluoridate my water supply.

Our public health officials claim water fluoridation is an effective way to prevent the high rates of tooth decay now found in low-income children. There are problems with this idea:

- 1) There are oral health crises in low-income areas that have been fluoridated for decades. Fluoridation has not prevented low-income neighbourhoods from suffering a crisis of tooth decay
- 2) Published studies have repeatedly found that fluoridation does not prevent the type of tooth decay – baby bottle tooth decay (BBTD) – that is one hallmark of the current local oral health crisis. Photos used to emphasize the urgent need for fluoridation are almost always photos of BBTD. Only education can prevent BBTD. Fluoridation will have no effect.
- 3) The poor are most harmed by fluoride, suffering higher rates of dental fluorosis, as well as the other health effects of fluoride, especially diabetes and asthma. Poor diet results in more tooth decay **and** more harm from fluoride.....
- 4) MOH and councils think that just fluoridating the water will prevent children getting tooth decay, but it has not and will not. Parents must be taught that they can not give their children

sugary drinks and must be taught how to feed their children healthy food – this is the answer, NOT fluoridating. How much money has been spent on forcing communities to fluoridate when that money should be spent on educating people as to why their childrens teeth are so deteriorated and what we can do to prevent it.

5) some people are reactive to fluoride and can't clear it from their systems – putting it into drinking water will exacerbate health problems including infertility and hypo-thyroidism due to the FI competing with Iodine as well as the more obvious fluorosis issue.

Proven potential for harm - William Marcus, the senior scientist in the Office of Drinking Water at the Environmental Protection Agency, expressed concerns about the “systematic downgrading” of cancers in a 1990 published study and requested that the EPA assemble an independent board of pathologists and others to review the data produced in the study.

Marcus has this to say about the study:

“... rats got cancer of the bone and they got a very unusual cancer of the liver. And that was extremely surprising. First of all to produce cancer of the bone in rodents is never seen because the time that you have between birth and death of a rodent is only 3 ½ to four years and it usually takes longer than that to produce a cancer in bone. The cancer of the liver is extremely rare and the fact that it happened meant that it was significant. This doesn't happen. I wrote this memo in which I claimed that I thought fluoride was a carcinogen and that we had as much evidence with the animal studies to show that it was a carcinogen as we had with any of the other compounds [that EPA studied] and therefore should be treated as such.”

It is the legal responsibility of public servants to ensure that they do not harm their community – what are you planning to do to ensure that no one is harmed by the inherent toxicity of both fluoride and the contaminates in the water fluoridation compounds? MOH and local councils will be leaving themselves open to being sued for illness outcomes and therefore spending more tax payer dollars on defending an indefensible argument.

Estimates of the ingested dose of fluoride necessary to produce acute toxicity in adults vary from 7 to 70 mg (1 mg/liter = 1 ppm), and the lethal dose ranges from 70 to 140 mg/kg. According to the handbook, Clinical Toxicology of Commercial Products, **fluoride is more poisonous than lead** and just slightly less poisonous than **arsenic**. We took lead out of petrol and paint – why do we put something more toxic straight into the drinking water? Not only that, but do you understand the effect of pumping Fluoride and its contaminants into lakes, rivers, seas – is there a short or long term effect on animal and plant life? What is it, and what is the dose at which animals are affected? We drink less than 0.1% of the water that comes out of our taps – if someone wishes to take Fluoride as a supplement, it would be far less wasteful if they did so personally. Any organic farms that use town supply would lose their organic status because they would be using poisonous substances on their soils. Councils could be sued for loss of income.

If there is a mistake made and excess Fluoride is released accidentally in to the water supply, the council may be responsible for deaths in the community. The difference between a ‘therapeutic’ and a deadly dose is not huge with Fluoride, as it is amongst other things, an enzyme disruptor and our body is functions due to enzyme reactions – stop the enzyme reactions and you stop body function. Fluoride is a known neuro-toxin and also a component of many anti-depressant medicines, therefore there is huge potential for mental disorders

arising from water fluoridation and you can't say that water fluoridation is not a medication because it has been shown to affect brain function (negatively).

As there is no proof of no harm done, and lots of proof that harm is done, there is no way that you can make fluoride a water-treatment. It is NOT SAFE, it is NOT EFFECTIVE – please see *John Colquhoun's* (Auckland's Chief Dental officer) article attached for more information on that.

Question 2. Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?

NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people. Fluoride is incredibly toxic at low and high doses and should not be added to anyone's water supply.

Kindly



Submission re Fluoride  
askmedsafe

06/01/2015 10:11 p.m.

History:

This message has been replied to.

**SUBMISSION TO CONSULTATION ON PROPOSED AMENDMENT TO REGULATIONS UNDER THE MEDICINES ACT 1981 - Fluoride (2014)**

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

“It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies.” Medsafe

Name: .

Email: \_\_\_\_\_

Address: - -

**Question 1.** *Do you support the proposed amendment? If not why not?*

**NO.** I do not support the proposed amendment because:

1. Fluoride is not a water treatment like chlorine
2. Fluoride is added to the water as treatment for the disease of dental caries therefore it is a medicine
3. The Medicines Act is designed to protect people from the risk of indiscriminate use of medicines, reflecting the ethical codes of health professionals to “first do no harm”
4. The proposed amendment would effectively remove the safety precaution protecting people from harm thereby undermining the right of every New Zealander to be safe from the indiscriminate use of medicines

**Question 2.** *Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

**NO.** Fluoride and its compounds are **not** used to ‘**treat**’ community water supplies. In community water fluoridation (CWF) the **purpose** of fluoride and its compounds is to **treat people**

*I do not wish to speak to my submission.*




**Submission**

: askmedsafe@moh.govt.nz

06/01/2015 10:17 p.m.

History:

This message has been replied to.

**Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)**

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Fluoride Submission

to: askmedsafe

06/01/2015 10:18 p.m.

History: This message has been replied to.

To whom it may concern

I do not give permission for my personal details to be released to persons under the Official Information Act 1982

Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 - Fluoride (2014)

"It is proposed that a new regulation be made under section 105(1)(i) that: Fluoride containing substances, including the substances hydrofluorosilicic acid (HFA) and sodium silico fluoride (SSF) are not medicines for the purpose of the Act when they are manufactured and supplied or distributed for the purpose of fluoridating community water supplies." Medsafe

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Email:  
Address:

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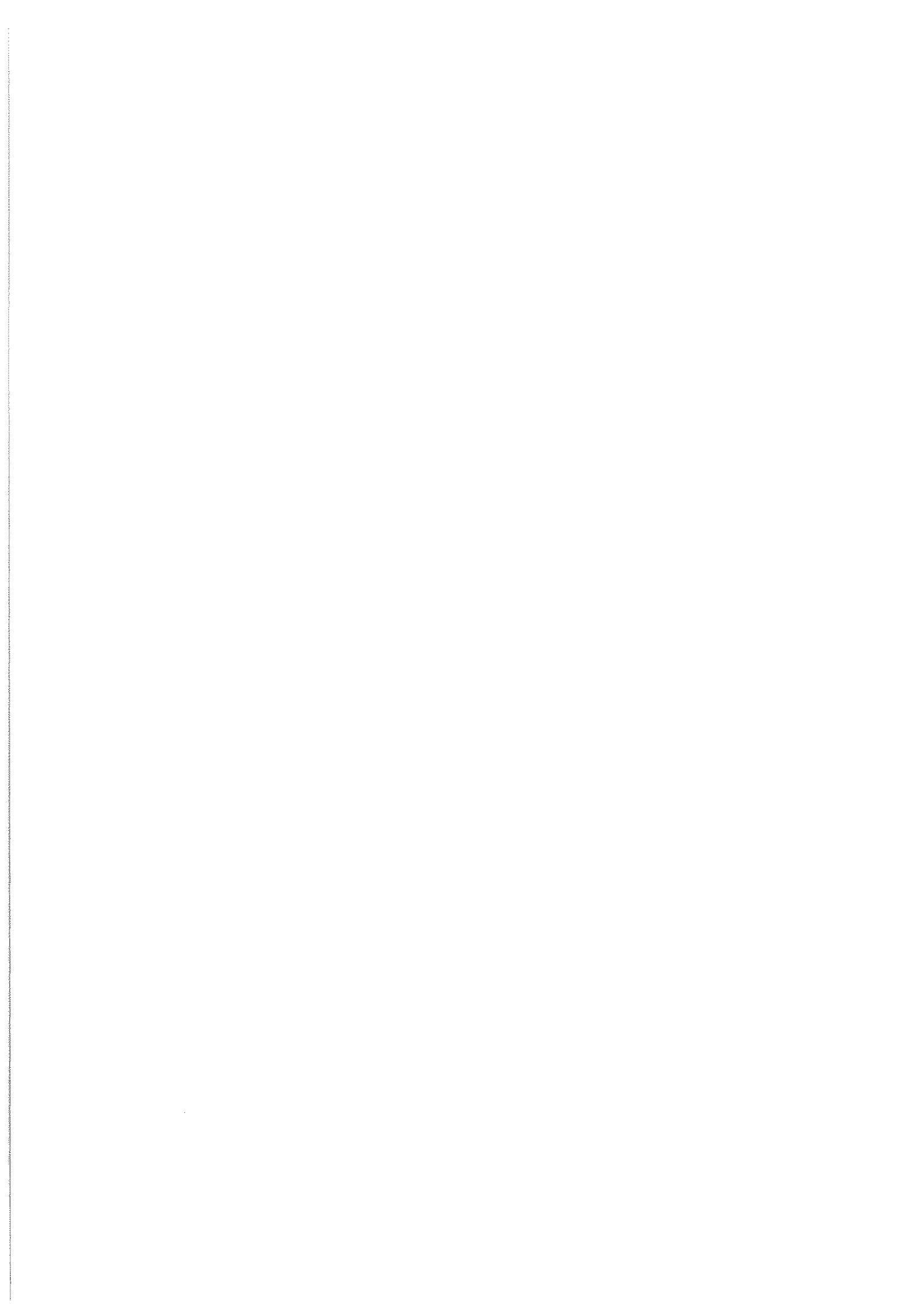
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NO. Fluoride and its compounds are not used to 'treat' community water supplies. In community water fluoridation (CWF) the purpose of fluoride and its compounds is to treat people

I do not wish to speak to my submission.

Regards





History:

This message has been replied to.

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**Fluoride Submission**

: askmedsafe

06/01/2015 10:20 p.m.

History:

This message has been replied to.

**Question 1***Do you support the proposed amendment? If not why not?*

Yes, it is vital that fluoride be used in water to prevent dental caries in our most vulnerable citizens. Fluoride has been proven time and time to be safe in academic research, and a fluoride rate of 1.5ppm doesn't put people at risk of fluorosis.

**Question 2***Are there other fluoride-containing compounds used to treat community water supplies that should be specifically named in the regulation? If so, what are they?*

Not as far as I am aware as the amendment contains all relevant fluoride-containing compounds.





Proposed Amendment to Regulations under the Medicines Act 1981 -  
Fluoride (2014)

From: askmedsafe

Date: 06/01/2015 10:20 p.m.

History:

This message has been replied to.

SUBMISSION

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Submission to Consultation on Proposed Amendment to Regulations under the Medicines Act 1981 – Fluoride (2014)

“It is proposed that a new regulation be made under section 105(1)(l) that:

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*I do not wish to speak to my submission.*

*Thank you.*

