



**Attachment 2:**

133 Molesworth Street  
PO Box 5013  
Wellington 6140  
New Zealand  
T+64 4 496 2000

18 July 2023

Stavros Michael  
Deputy Chief Executive - Infrastructure & Environment Rotorua Lakes Council

Tēnā koe Stavros

Thank you for your email messages of 21 June 2023 and 6 July 2023 regarding community water fluoridation.

As you are aware, in July 2022 the Director-General of Health issued a direction to Rotorua Lakes Council to fluoridate the Rotorua Central and Rotorua East drinking water supplies. I would like to thank Council officers for their work with Manatū Hauora to progress implementation to the point where approval in principle has been given for funding from Manatū Hauora for the cost of the capital works to fluoridate the two water supplies.

You have asked for comment from Manatū Hauora in relation to concerns raised by Rotorua Lakes councillors about the safety of community water fluoridation.

Extensive research carried out around the world, including in Aotearoa New Zealand, supports the conclusion that community water fluoridation is safe and effective at the levels used in Aotearoa New Zealand. Community water fluoridation is endorsed by the World Health Organization and a range of other international health authorities as a safe and effective measure to reduce dental decay. This conclusion is consistent with the findings of the comprehensive review published in 2014 by the Royal Society Te Apārangi and Office of the Prime Minister's Chief Science Advisor (OPMCSA), and with the OPMCSA's 2021 Fluoridation: an update on evidence (Evidence Update).

The Evidence Update considered the major scientific developments from 2014 to June 2021. You refer in your email to the draft *National Toxicology Programme Monograph on the State of the Science Concerning Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects: A Systematic Review* (the draft State of the Science review). An earlier version of the draft State of the Science review (draft circulated 16 September 2020) was considered in the Evidence Update. Please refer to page 25 of the pdf version of the Evidence Update for commentary on the draft State of the Science review, which you can find here: [www.pmcsa.ac.nz/topics/fluoridation-anupdate-on-evidence/](http://www.pmcsa.ac.nz/topics/fluoridation-anupdate-on-evidence/)

The Evidence Update has confirmed the findings of the 2014 report by the Royal Society Te Apārangi and the OPMCSA and concluded that "while there is some evidence that high fluoride concentrations may have an adverse effect on developing brains, there is no convincing evidence of neurological effects at fluoride concentrations achieved by fluoridation of water supplies in Aotearoa New Zealand".

The 2014 report by the Royal Society Te Apārangi and the OPMCSA recommended that a review be repeated or updated every 10 years, or earlier if a large well-designed study appears likely to have shifted the balance of health benefit versus health risk. Manatū Hauora keeps a watching brief on the national and international evidence base.

In your email you also express concern about Rotorua Lakes Council's potential liability under the Health and Safety at Work Act 2015. I understand that you have subsequently sought and received your own legal advice on this matter.

In your further email of 6 July 2023, you ask about the impact of the Hazardous Substances and New Organisms Act 2003 (HSNO) in relation to the directions to fluoridate issued under Health Act 1956. A range of legislation, including the HSNO, should be considered when designing and implementing a fluoridation system. In addition, local authorities must comply with the drinking water standards for New Zealand, including not exceeding the maximum acceptable value for fluoride.

For further guidance you may wish to refer to Water New Zealand's Good Practice Guide for Fluoridation of Water Supplies in New Zealand. This guide has been developed to assist water suppliers in the design and operation of water fluoridation plants to enable effective addition of fluoride to water supplies in a manner which protects public health, and also the operators who maintain the plants.

[www.waternz.org.nz/Article?Action=View&Article\\_id=2424](http://www.waternz.org.nz/Article?Action=View&Article_id=2424)

[www.waternz.org.nz/Article?Action=View&Article\\_id=2388](http://www.waternz.org.nz/Article?Action=View&Article_id=2388)

My team looks forward to continuing to support your council to introduce fluoridation in Rotorua. If you would like any further information please contact Barbara Burt, Manager, Policy and Regulation, Public Health Agency | Te Pou Hauora at [Barbara.burt@health.govt.nz](mailto:Barbara.burt@health.govt.nz).

Nāku noa, nā



Ross Bell  
**Acting Deputy Director-General**  
**Public Health Agency | Te Pou Hauora Tūmatanui**