

FOODS TO BE POISONED WITH FLUORIDE

FOODS TO BE FUMIGATED WITH FLUORIDE GAS MEANS FOODS WILL HAVE HIGH FLUORIDE

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Our food is under attack. The Federal pesticide regulatory body APVMA has approval pending for DOW's product PROFUME (SULFURYL FLUORIDE) to fumigate foods (by fumigating silos, food warehouses, food storage, and processing facilities with unprotected, uncovered foods still inside)

This will result in very high levels of fluoride in foods (but APVMA says fluoride exists in the environment..... so they will allow very high levels of fluoride in foods but not actually monitor Fluoride for compliance purposes.....very handy for DOW)

The level of fluoride allowed in fluoridated water is closely monitored, the amount of fluoride in fumigated foods will not be monitored for compliance (only the much smaller level of the Sulfuryl Fluoride gas that could be left in foods will be monitored for compliance purposes)

APVMA should consider people's health before DOW's profit.

Already concerned about how much fluoride you may consume from fluoridated drinking water..... ?

then you will be very concerned about AUSTRALIAN PESTICIDES AND VETERINARY MEDICINES AUTHORITY (APVMA) pending approval to licence DOW AGROSCIENCES product PROFUME for a first time food use in Australia. PROFUME is SULFURYL FLUORIDE gas which under the trade name Vikane has been in use for 40 years to kill termites. Dow's listed Profume use application is to kill insects and rodents.

If approved, the pesticide SULFURYL FLUORIDE will be used to fumigate food storage areas, silos and food handling facilities with foods left inside, resulting in foods that have very high levels of FLUORIDE residues.

APVMA has given the public only until the end of business 2nd of October for acceptance of public submissions / objections.

However if contacted by email or phone by the end of business Tuesday 2nd October, APVMA will now grant an extension until the 16th October on request for extra time if you want to put in a submission about Profumes's use on foods.

EVEN IF NOT ABLE TO CONTACT APVMA BY THE 2nd OCT AND YOU WISHED TO OBJECT JUST SEND BY THE 16th OCT, APVMA GAVE VERY LITTLE TIME FOR PUBLIC CONSULTATION AND ARE HAVING TO ACCEPT OTHER SUBMISSIONS UNTIL THE 16TH OCTOBER.

APVMA contact details are.....

- 1) email Laura.Leis@apvma.gov.au"
- 2) phone (02) 62104763
- 3) mail Laura Leis - Pesticides Divison , APVMA , PO BOX 6183, KINGSTON ACT 2604

The toxic active agent in Sulfuryl Fluoride is the Fluoride ion which interferes with glycolysis and the citric acid cycle in body metabolism.

It is the Fluoride component of Sulfuryl Fluoride that kills termites, other insects , rodents and has resulted in human deaths from entry into fumigated structures.

SULFURYL FLUORIDE reacts with proteins in foods on contact leaving small amounts of Sulfuryl Fluoride residues and much higher levels of Fluoride ion.

APVMA's assessment is that Fluoride ion occurs in the environment and thus will not be used for monitoring or compliance purposes, only Sulfuryl Fluoride will be the " defined " residue for compliance.

THE DECISION FROM APVMA THAT SULFURYL FLUORIDE FUMIGATION OF FOODS (WHICH WILL RESULT IN VERY HIGH LEVELS OF FLUORIDE IN FOODS) IS NOT A RISK TO HUMANS, ANIMALS OR THE ENVIRONMENT

IS VERY WRONG

THIS DECISION THAT "FLUORIDE" WILL NOT BE A DEFINED RESIDUE AND WILL NOT BE MONITORED FOR COMPLIANCE PURPOSES IS WRONG AND NEEDS ADDRESSING

APVMA's approval for Profume's use will be on whole cereal grains , dried fruits , tree nuts, peanuts , baled hay for animals and on pet foods. After Food Standards Australia and New Zealand (FSANZ) does Food Fluoride intake modelling, use may be extended to other food groups.

Water is commonly fluoridated at 1mg/kg or 1 part per million (reduced to 0.6 ppm in Darwin to reduce risk from higher intake with higher water consumption)

APVMA is proposing Maximum Residue Limits (MRLs) for FLUORIDE ion of:

- 5 ppm in dried fruits ,
- 7 ppm in whole cereal grains,
- 10 ppm in wheat germ (made from fumigated whole wheat grains) and
- 30 ppm in all tree nuts and peanuts.

APVMA in most cases allows much smaller allowable MRLs for Sulfuryl Fluoride , but being a gas, most Sulfuryl Fluoride would evaporate out of foods anyway.

If approval is granted it will mean that:

- dried fruits can contain 5 times as much Fluoride as there is in fluoridated water ,
- whole grains can contain 7 times as much Fluoride as in fluoridated water
- wheat germ 10 times and
- tree nuts and peanuts can contain 30 times as much Fluoride as in fluoridated water.

Yet the Fluoride contents of these foods will not need to be monitored for compliance purposes, unlike water fluoridation. Sulfuryl Fluoride gas residues (which evaporate out of foods) will be the only residue monitored for compliance.

No residue limits have even been set for fumigated Hay intended for animal feed or for fumigated pet foods or seeds for propagation.

Fluoride is well known to be a protoplasmic poison and enzyme inhibitor. Ingested fluoride accumulates in the body with adults storing about 60% of that ingested. Children can accumulate 80% of the Fluoride that they ingest. Almost all of accumulated Fluoride accumulates in bones. Contaminating foods with fluoride will mean that people will now be ingesting much more Fluoride than ever before and will be accumulating much more fluoride in their bones.

There is no need or excuse to use a poison that contaminates food stuffs with Fluoride There are safe solutions available to treating food related pests such as heat and cold treatment and atmosphere modification (Carbon Dioxide) that Organic food companies employ.

THERE ARE MANY ISSUES WITH THE PROPOSED USE OF SULFURYL FLUORIDE ON FOODS LISTED BRIEFLY BELOW.

LINKS ARE GIVEN AND FUTHER INFORMATION CAN BE OBTAINED FROM

info@qawf.org

Queenslanders Against Water Fluoridation Inc

FSANZ online 2006 " Fluoride in foods" shows most foods presently contain very little Fluoride (unless prepared with fluoridated water). Most tree nuts and peanuts do not contain measurable Fluoride levels but when fumigated, will be allowed to contain 30mg/ kg (equivalent to 30 ppm ; water fluoridated at 1ppm)

FSANZ online 2006 data also shows dried apricots, fresh grapes and apples do either not contain Fluoride, or very little Fluoride, yet fumigated dried fruits will now be allowed to contain 5 ppm (5 times more than Fluoridated water)

JMPR 2005 (Joint Meeting Pesticides Residues) joint FAO / WHO states Sulfuryl Fluoride is approved for "food purposes" in the US , also UK, Germany and Italy, but in the UK, Gemany and Italy, **structures must be emptied of food before fumigation.**

Currently APVMA is not allowing Sulfuryl Fluoride to be used on "processed foods" such as flour. Flour has a much greater surface area compared to its volume than the whole grains that the flour is made from, thus if flour is fumigated it absorbs a lot more Sulfuryl Fluoride resulting in very high levels of fluoride ion.

Although APVMA does not propose letting flour and other processed foods be fumigated at this time, APVMA has put forward recommended MRLs of 120 ppm for fumigated wheat germ and a MRL of 75 ppm for fumigated maize flour if processed foods fumigation allowed at a future date.

In the US the EPA has approved Fluoride MRLs of 125 ppm in flour and a massive 900 ppm in dried eggs (common fluoride toothpaste contains 1000 ppm Fluoride)

The proposed approval for use does not preclude multiple fumigations.

There is a dearth of data provided on toxicity of fluoride by the oral route, one study that oral toxicity claims are based on, is an unpublished Anonymous study from 1959 with rats consuming fumigated foods . Comments include that it was prior Good Laboratory Practice. Another study was using ingested corn oil that had had Sulfuryl Fluoride bubbled through. Comment on this study was that it was difficult to interpret.

Almost all studies on Sulfuryl Fluoride are animal inhalation studies and the Australian Office of Chemical Health Safety Health Risk Assessment says that the absence of suitable studies with oral exposure (as in foods) is the main deficiency.

There were apparently no cancer studies required to register Sulfuryl Fluoride as a pesticide in the US.

There is no known antidote to over-exposure to Sulfuryl Fluoride (Dow MSDS)

Sulfuryl Fluoride is scheduled as an S6 poison , but the fluoride chemical mostly used for water fluoridation in Australia is classed as an S7 poison. There is reasonable argument that Sulfuryl Fluoride should be scheduled as S7.

Sulfuryl Fluoride is 3.2 times heavier than air. After fumigation , the gas is released, often blown out with fans and potentially a risk to humans and animals in the nearby vicinity. Being heavier than air, the gas could flow to lower areas. In small Australian country towns silos are often in the heart of populated areas.

Sulfuryl Fluoride is colourless and odourless and the Australian Office of Chemical Safety Assessment and advice and recommendation to APVMA was that a suitable stenching agent (a warning gas such as Chloropicrin, a tear gas) MUST be used with Sulfuryl Fluoride, yet APVMA's proposed label for use shows instead that it " MAY " be used . There is NO compulsion to use a safety warning agent.

In the US since 1993 there have been 13 human deaths resulting from entry into fumigated premises and 335 reports of adverse health effects. No data has been provided on how many deaths there have been worldwide in the last 40 years it has been used as a fumigant for termites.

Fluoride has never been shown to be nutrient, vitamin or mineral necessary for life, yet the NHMRC has listed it as a nutrient despite the lack of any human or animal studies showing that it is necessary for life, or good health. It is not even necessary for good teeth, you can have perfectly good teeth and no decay without ever having consumed fluoridated water , Fluoride supplements or having used fluoridated toothpaste.

The NHMRC classed Fluoride as a "nutrient" only because of a belief that Fluoride reduces decay. There are now many children's dental surveys that show the same low levels of tooth decay in areas without water fluoridation as in areas with water fluoridation.

The NHMRC has set recommended upper limits of intake for their self declared nutrient Fluoride of 10mg fluoride / day for adults and 1.3 to 2.2 mg Fluoride a day for children aged 1 to 8 years old. A child drinking 2 litres of water a day if water is fluoridated at 1mg/L would already be getting 2mg a day and this would be before figuring in any fluoride ingested from any sources such as from swallowed toothpaste, or dental treatments or fluoridated antibiotics, air pollution etc.

Adults who are big tea drinkers can already be consuming amounts of fluoride from their favourite beverage as tea is a peculiar plant that takes up fluoride from soil. Adults who are outdoor workers and who drink lots of water could already be breaching intake levels of 10 mg /day just from fluoridated water and tea.

The NHMRC in 1991 and 1999 said that health and safety studies on water fluoridation should be done and that total fluoride intake studies should be done and bone fluoride estimations should be done. These studies have not been done but FSANZ is slated to do Fluoride intake modelling studies next year, but this would

almost certainly be after Profume is approved for use.

FSANZ has already done a DIAMOND (Diamond Modelling Of Nutritional Data) computer modelling of Sulfuryl Fluoride to estimate the chronic (long term) estimated dietary exposure of the general population , but this data was not to be released to the public citing " Commercial Confidence " It is not known if a model of Fluoride exposure resulting from Sulfuryl Fluoride use has been done

Considering that Inorganic Fluoride is the major and cumulative residual of Sulfuryl Fluoride, APVMA should have considered the National Research Council (US) report from March 2006 that reported on many adverse health effects linked to Fluoride in drinking water (regardless from artificial fluoridation or from natural contamination up to 4.0 ppm in a very small percentage of water supplies) This recent report does not appear to have been considered.

APVMA should have considered the Elise Bassin paper in " Cancer Causes Contol " from 2006 that links Osteosarcoma to fluoride in drinking water (a link previously reported in other human and animal studies) APVMA should have also considered the American Dental Association and the Centre for Disease Control and Prevention advisories from late 2006 that infants under 12 months of age not consume fluoride (mainly as in fluoridated water) as part of APVMA's approval decision process. The advisories resulted from the NRC report with recognition that infants under 12 months of age are at risk of dental fluorosis from Fluoride overdose.

APVMA should have considered the Lancet's recognition (2006) of Fluoride as an emerging Neurotoxin. There are a number of studies from China linking Fluoride in drinking water to reductions in IQ.

APVMA admits that that there may be a transfer of Fluoride ion into milk, meat and other commodities as a result of fumigated grain being fed to livestock, but no information has been provided.

Countries that do not allow Sulfuryl Fluoride residues, or have lower allowable levels could be a problem for trade in fumigated food commodities.

If Australian foods are also fumigated with Sulfuryl Fluoride it will be easier for American exporters to get fumigated (fluoridated) foods into Australia. We may already be consuming Sulfuryl Fluoride fumigated USA produce.

Organic produce will not be able to be stored in the same warehouses / food storage facilities if these facilities will be fumigated.

APVMA has said that it would be up to DOW to alert all stakeholders of potential risk with residues and trade.

Sulfuryl Fluoride is being promoted as a more " Greenhouse friendly" replacement for Methyl Bromide, yet no Carbon Dioxide equivalent comparison data for Sulfuryl Fluoride and Methyl Bromide is yet available from APVMA and apparently was not considered . Another Sulphur- Fluoride gas, Sulfur Hexafluoride is now being recognized as potentially the worst Greenhouse Gas, being 23 thousand times more potent than Carbon Dioxide.

The California Dept of Pesticide Regulation (C DPR) considers only limited information is available regarding any potential environmental breakdown products of Sulfuryl Fluoride and also that it has a long, or very long lifetime and should, therefore be considered as a Greenhouse Gas.

As listed there are many areas of concern with the use of Sulfuryl Fluoride on foods. It should never be approved for use in this manner, but if it is approved for fumigating food storage and handling facilities it is imperative that the foods be first removed.

If you are as concerned as we are, please let APVMA know of your concerns. Submissions will be accepted until 2nd Oct or If APVMA is contacted before 2 Oct , they will grant an extension for submissions on Profume until the 16th Oct 2007

email Laura.Leis@apvma.gov.au
or phone (02) 62104763

For more information see following links or contact QAWF for information on the Technical reports that can be purchased from APVMA

APVMA website home page
APVMA Sulfuryl Fluoride Gazette Notice

APVMA Sulphuryl Fluoride Public Release Summary
FSANZ " Fluoride in Foods " webpage
FLUORIDE ACTION NETWORK SULFURYL FLUORIDE PAGE
FLUORIDE ACTION NETWORK EPA FLUORIDE MRLS
JMPR 2005 (FAO / WHO)
NHMRC
HAGUE ASSESSMENT of Sulphuryl difluoride (another name for Sulphuryl Fluoride)
VIKANE (the product name for Termite fumigation) a cause for concern.

www.apvma.gov.au

http://www.apvma.gov.au/gazette/0709downloads/profume_p18.pdf

http://www.apvma.gov.au/publications/downloads/prs_profume.pdf

<http://www.foodstandards.gov.au/monitoringandsurveillance/nuttab2006/o...tID=F>

FSANZ fluoride content expressed as microgram per 100 gram (ug /100g) For conversion purposes 100ug / 100g is equivalent to 1mg / kg or 1 part per million

<http://www.fluoridealert.org/pesticides/sulfuryl-fluoride-page.htm>

<http://www.fluoridealert.org/pesticides/sulfuryl.f.all.food.html>

http://whqlibdoc.who.int/publications/2006/9241665211_15_eng.pdf

<http://www.gr.nl/pdf.php?ID=1104>

http://orgs.sa.ucsb.edu/tenants/hot_topics_files/Vikane%20Facts%20Sheet.pdf