

Montrouge, 20 May 2021

**For the attention of Dr Benedikt Huttner
Secretary of the Expert Committee on the Selection and Use of Essential Medicines
World Health Organization, Geneva, Switzerland**

Re: Comments related to the application *A.14 Fluoride Toothpaste – Dental Caries - EML and EMLc*

Dear Dr. Huttner,

Aide Odontologique Internationale (AOI), a French non-governmental organisation founded in 1983, has as objective the improvement of health and oral health of disadvantaged populations, predominantly in developing countries. One of the pillars of AOI's work over the last twenty years has been the promotion of fluoride toothpaste for effective prevention of dental caries (tooth decay). Through working with governmental, academic and civil society partners, AOI has first-hand experience in a number of low-income countries, such as Burkina Faso, Madagascar, Laos and Cambodia. Across such different settings we have identified two major challenges that impede the promotion of population-based use of effective fluoride toothpaste – the product's affordability and its quality in terms of available fluoride content.

We strongly support the inclusion of fluoride toothpaste for the prevention and control of dental caries on the EML and EMLc for the following reasons:

- Inclusion will, most importantly, underline the significant public health relevance of fluoride toothpaste as the most common, widespread and evidence-based method for the delivery of fluoride to combat the global pandemic of dental decay. The lack of realistic recommendations for fluoride formulations that can be universally available to populations, even in resource-poor settings, has led to limited public health policies in support of widespread fluoride toothpaste use.
- Inclusion of fluoride toothpaste will facilitate efforts to reduce taxation and other levies, similar to legislation in place for essential medicines, which often enjoy a reduced or elimination of VAT, among other measures. This will contribute to lower retail prices for fluoride toothpaste and render it more affordable to a far wider proportion of the population.
- Inclusion of fluoride toothpaste will assist in countries developing legislation on norms for effective fluoride toothpaste, similar to the approaches taken for quality assurance of other essential medicines. AOI has been involved in scientific studies that revealed low quality fluoride toothpaste products in several developing countries. Due to insufficient content of available fluoride, the effectiveness for preventing dental caries is reduced or non-existent. We therefore encourage the establishment of national norms and quality standards, as well as independent testing of toothpaste for available fluoride content. This, in turn, forces manufacturers and distributors to be diligent in their quality control to ensure that only effective products are licensed and available on national markets.

The importance of fluoride toothpaste for the prevention of dental caries cannot be emphasized enough. Its population-wide use must be enhanced as part of public health strategies to combat the global burden of dental caries. **AOI strongly urges the Expert Committee on the Selection and Use of Essential Medicines at its 23rd meeting in June 2021 to accept Application A.14 Fluoride Toothpaste – Dental Caries.**

Dr. Bernard Decroix, Director, Aide Odontologique Internationale (AOI), France.

Dr. Christopher Holmgren, Scientific Advisor, Aide Odontologique Internationale (AOI), France.