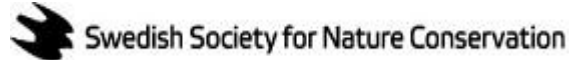




World Alliance for Mercury-Free Dentistry
Alliance Mondiale pour une dentisterie sans mercure
Всемирный альянс за стоматологию без ртути
Alianza Mundial por una Odontología Sin Mercurio
التحالف العالمي لطب أسنان خال من الزئبق
世界无汞牙科联盟



Phase Out Amalgam Use in the European Union

The European Union is the largest user of dental mercury in the world – consuming at least 90 tonnes in 2010.¹ No policy to phase out amalgam exists so far; amalgam remains, as SCHER stated, “a secondary poisoning” for the children of Europe.

We commend the specialized attention the European Commission has given to amalgam over the past five years, engaging consultant BIOIS, having hearings, re-referring the issue to SCHER, and SCENIHR, and consulting publically on whether to “phase out” or “phase down” amalgam (the choice was seven-to-one in favour of “phase out”, with a total number of respondents double that of other issues).

It is time for the EU – which has been advocating strong international action to address the problems posed by mercury’s release into the environment² – to choose between phase down and phase out. We NGOs (logos above) believe that the best answer is to phase out (even if it includes a few time-limited exceptions).

- **The EC’s independent consultant urged an amalgam ban:** The European Commission’s independent consultant BIOIS has examined all the policy options and urged the EU to “ban the use of mercury in dentistry” because – among other reasons – it is “necessary to achieve mercury-related requirements of EU legislation on water quality.”³
- **SCHER confirmed that amalgam poses environmental risks:** SCHER has confirmed that dental amalgam in the environment can methylate (forming the most toxic form of mercury, methylmercury), and that as a result “the acceptable level in fish is exceeded” under some circumstances, and “a risk for secondary poisoning due to methylation cannot be excluded.”⁴
- **SCENIHR recommends amalgam restrictions:** “.....To reduce the use of mercury-added products in line with the intentions of the Minamata Convention (reduction of mercury in the environment) and under the above mentioned precautions, it can be recommended that for the first treatment of primary teeth in children and for pregnant patients, alternative materials to amalgam should be the first choice.”⁵ Furthermore, SCENIHR **withdrew the claim that amalgam is safe**. SCENIHR’s 2015 final opinion states that amalgam is merely “an effective restorative material”⁶, a clear downgrading from its prior 2014 draft statement that amalgam is a “safe and effective restorative material.”^{7 8 9}

In addition to the EC’s own studies, public support for phasing out amalgam use is overwhelming:

- **The public supports phasing out amalgam use:** As part of its public consultation on the Minamata Convention, the European Commission asked EU citizens: Should amalgam use be phased down...or phased out? Of the respondents, 88% favoured the phase OUT of amalgam.¹⁰
- **Mercury-free fillings are increasingly preferred by dentists:** As one European dental researcher explains, the “tooth-friendly features of resin-based composites make them preferable to amalgam,

which has provided an invaluable service but which, we believe, now should be considered *outdated for use in operative dentistry*.¹¹

- **Experts show phasing out amalgam use will lower costs:** As one study explains, due to the high costs of dental mercury pollution, amalgam is now recognized as “more expensive than most, possibly all, other fillings when including environmental costs.”¹² Another study, conducted by Concorde East/West, concludes that an amalgam filling can cost up to \$87 more than a composite filling after environmental costs are taken into account.¹³
- **Industry is already prepared for amalgam’s demise:** The dental industry is already anticipating the phase-out of amalgam use in the EU. At the 2013 European Dental Materials Conference, dental manufacturers devoted an entire day to “The Demise of Amalgam Use”.
- **Member states are already phasing out amalgam use:** Already amalgam is used for 0% of fillings in Sweden¹⁴, 3% in Finland¹⁵, 5% in Denmark,¹⁶ and less than 10% in the Netherlands.¹⁷ These nations have successfully implemented restrictions and bans on amalgam use, demonstrating that other EU countries can too. Many have already expressed their willingness to do so. For example, the United Kingdom has announced that it can “support a ban on the use of dental amalgam from 2016 with agreed exemptions” (essentially the narrow exemptions used in Denmark).¹⁸

Given that across a wide range of experts, stakeholders and the public, the call is to move away from amalgam use, we ask you to phase out amalgam use in the EU in order to reach the EU’s goals on mercury.

¹ AMAP/UNEP, *Technical Report for the Global Mercury Assessment* (2013), <http://www.amap.no/documents/doc/technical-background-report-for-the-global-mercury-assessment-2013/848>, p.103

² *Ibid.*, p.14

³ BIO Intelligence Service (2012), *Study on the potential for reducing mercury pollution from dental amalgam and batteries*, Final report prepared for the European Commission-DG ENV, http://bookshop.europa.eu/es/study-on-the-potential-for-reducing-mercury-pollution-from-dental-amalgam-and-batteries-pbKH3013440/downloads/KH-30-13-440-EN-N/KH3013440ENN_002.pdf?FileName=KH3013440ENN_002.pdf&SKU=KH3013440ENN_PDF&CatalogueNumber=KH-30-13-440-EN-N%20Study%20on%20the%20potential%20for%20reducing%20mercury%20pollution%20from%20dental%20amalgam%20and%20batteries, page 20

⁴ SCHER, *Opinion on Environmental Risks and Indirect Health Effects of Mercury from Dental Amalgam* (2014), http://ec.europa.eu/health/scientific_committees/environmental_risks/docs/scher_o_165.pdf, page 4

⁵ European Commission Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), *Final opinion on the safety of dental amalgam and alternative dental restoration materials for patients and users* (29 April 2015), http://ec.europa.eu/health/scientific_committees/emerging/docs/scenihr_o_046.pdf, p.75

⁶ European Commission Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), *Final opinion on the safety of dental amalgam and alternative dental restoration materials for patients and users* (29 April 2015), http://ec.europa.eu/health/scientific_committees/emerging/docs/scenihr_o_046.pdf, p.71 (“The SCENIHR recognises that dental amalgam, for the general population, is an effective restorative material.”)

⁷ In its earlier 2008 opinion, SCENIHR’s preliminary opinion in 2014 claimed in section 4.1 that amalgam is “a safe and effective restorative material.” But after reviewing the evidence, SCENIHR explained in its response to experts’ comments, “The word ‘safe’ has been deleted in 4.1.”

⁸ European Commission, *Results of the public consultation on SCENIHR’s preliminary opinion on the safety of dental amalgam and alternative dental restoration materials for patients and users*, http://ec.europa.eu/health/scientific_committees/emerging/docs/followup_cons_dental_en.pdf, p.97 (“The word “safe” has been deleted in 4.1.”)

⁹ European Commission Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), *Preliminary opinion on the safety of dental amalgam and alternative dental restoration materials for patients and users* (26 August 2014), p.66 (“The SCENIHR recognises that dental amalgam, for the general population, is a safe and effective restorative material.”)

¹⁰ <https://ec.europa.eu/eusurvey/publication/MinamataConvention>

¹¹ Christopher D. Lynch, Kevin B. Frazier, Robert J. McConnell, Igor R. Blum and Nairn H.F. Wilson, *Minimally invasive management of dental caries: Contemporary teaching of posterior resin-based composite placement in U.S. and Canadian dental schools*, J AM DENTA ASSOC 2011; 142; 612-620, <http://jada.ada.org/content/142/6/612.abstract> (emphasis added)

¹² Lars D. Hylander & Michael E. Goodsite, *Environmental Costs of Mercury Pollution*, SCIENCE OF THE TOTAL ENVIRONMENT 368 (2006) 352-370.

¹³ Concorde East/West, *The Real Cost of Dental Mercury* (March 2012), http://www.zeromercury.org/index.php?option=com_phocadownload&view=file&id=158%3Athe-real-cost-of-dental-mercury&Itemid=70, pp.3-4

¹⁴ World Health Organization, *Future Use of Materials for Dental Restoration* (2011), http://www.who.int/oral_health/publications/dental_material_2011.pdf, p.21

¹⁵ BIO Intelligence Service (2012), *Study on the potential for reducing mercury pollution from dental amalgam and batteries*, Final report prepared for the European Commission-DG ENV, http://ec.europa.eu/environment/chemicals/mercury/pdf/Final_report_11.07.12.pdf, p.190

¹⁶ *Ibid.*, p.190

¹⁷ World Health Organization, *Future Use of Materials for Dental Restoration* (2011), http://www.who.int/oral_health/publications/dental_material_2011.pdf, p.21

¹⁸ Letter, Department of Health to British Dental Association (23 May 2012).