

## DECLARATION TO END DENTAL INDUSTRY MERCURY USE

**Whereas;** the North American Hazardous Materials Management Association is dedicated to pollution prevention and reducing the hazardous components entering municipal waste streams from households, small businesses and other entities;

**Whereas;** it is the responsibility of state and local governments to manage municipal waste and costs of managing small quantities of hazardous substances increase these costs substantially;

Whereas; Dental amalgam is a dental filling material consisting of 50% elemental mercury;

**Whereas;** Mercury is a developmental, neurological, and renal toxin, as well as a heavy metal and persistent bioaccumulative toxin of global concern;

**Whereas;** Because of these concerns, 128 countries negotiated a legally binding treaty, the Minamata Convention on Mercury, which entered into force in August 2017 and since then, 102 countries have ratified the Convention;

**Whereas;** The U.S. government played a major role in the treaty negotiations and became the first country to ratify the Minamata Convention.

**Whereas;** The Minamata Convention requires each nation to reduce all incidental and purposeful uses and releases of mercury, including from dental amalgam.

**Whereas;** During treaty negotiations, the U.S. supported “further consideration of dental amalgam... such that the agreement is able to achieve the phase down, with the goal of eventual phase out.” w

**Whereas;** Dentistry is by far the largest use of mercury in the U.S, accounting for between 35% and 57% of all domestic mercury used in 2010.

**Whereas;** Dental amalgam pollutes the environment’s air, water and soil through an estimated 285 metric tons of dental mercury released from cremation, sewage treatment, and other pathways.

**Whereas;** Once dental amalgam enters the environment, “certain microorganisms can change elemental mercury into methylmercury, a highly toxic form that builds up in fish, shellfish and animals that eat fish.”

**Whereas;** Many developed nations have virtually eliminated dental amalgam. Dental amalgam use is banned in Sweden and Norway; only used in 3% of all dental restorations in Japan and Finland; 5% in Denmark; 10% in the Netherlands, Switzerland, and Germany; and 20% in Singapore.

**Whereas;** The European Union 1) instituted a mid-2018 ban on amalgam use in children, pregnant women, and breastfeeding women, 2) required Member States to develop strategies by 2019 to reduce amalgam use, and 3) set a deadline of 2020 for the European Commission to issue a report on phasing out all amalgam use.

**Whereas;** Some U.S. state and local governments have adopted fact sheets warning consumers about the risks of amalgam and the benefits of mercury-free dental fillings.

**Whereas;** Dental amalgam use is now recognized as more expensive than most, if not all, other fillings when factoring in environmental degradation and societal costs.

**Whereas;** Between 32% and 52% of all U.S. dentists have already stopped all amalgam use in their practices, using mercury-free filling materials instead.

**Whereas;** The top priority of any waste management hierarchy is source reduction, particularly where viable, available and cost effective substitutes are available;

**Whereas;** A 2010 World Health Organization (WHO) report explains that when compared to amalgam, “recent data suggest that RBCs [resin-based composites] perform equally well.”

**Whereas;** WHO’s report further states “Adhesive resin materials allow for less tooth destruction and, as a result, a longer survival of the tooth itself. Funding agencies should take the initiative and encourage the replacement of amalgam as the material of choice for posterior teeth.”

**Therefore;** We call upon the FDA to bring its policies in line with the United States Government as a whole and with its responsibilities under the Minamata Convention and to publicly advise a phase down of the use of dental amalgams with the goal of phasing out entirely.

DATE

March 11, 2019

SIGNED BY

Victoria A Hodge

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President, North American Hazardous  
Materials Management Association