



To the European Commission:

The transition to 21st –century dentistry – mercury-free and minimally-invasive – has substantially occurred across Europe. Now the imprimatur of government is necessary to complete the process to the benefit of all Europeans.

The past decade in Europe has witnessed a historic and drastic shift from amalgam to mercury-free dentistry: (a) by dentists in their clinics, (b) by consumers in their choices, (c) by manufacturers in their productions, (d) by scientists in their conclusions, and (e) by European Member and Non-Member States in their policies.

For the second time, the Commission’s consultant recommends an end to amalgam, the first being BIOIS in 2012. *At that time, Europe was not yet ready.* But since 2012 has come a torrent of developments that show, definitively and manifestly, that Europe stands ready for *the E.U. to take the necessary steps to complete the transition to mercury-free dentistry.*

- 2013: Manufacturers shift to welcoming the end of amalgam. The European Dental Materials Conference, announcing “the increasing likelihood . . . of a significant reduction or complete ban on the use of amalgam in the near future,” held its conference in Birmingham with the theme “The Demise of Amalgam.” The manufacturers welcomed the shift as an opportunity to make and market modern alternatives to amalgam.
- 2014: European public votes over 85% for the end of amalgam. The European Commission conducted an internet poll to determine public opinion about mercury issues. Twice as many Europeans voted on the amalgam issue than on the other questions (meaning half of them voted only on amalgam and exited the poll), and voted by more than 6 to 1 to end its use. By the high number of voters only on amalgam, the poll showed that the single biggest issue of concern on mercury was dental amalgam – and that its end was drawing almost universal support.
- 2014: SCHER adds major support to the environmental argument to ban amalgam. The environmental health scientists used the chilling term “secondary poisoning” to describe the process of dental amalgam getting into the fish, methylating, then being eaten by European children, the subpopulation most susceptible to permanent neurological harm.

- 2015: SCENIHR changes its position to disfavor amalgam. Reversing the robust support for amalgam in its 2008 report, the health scientists not only recommended an end to amalgam right away for children and pregnant women, but upon a question from Norway, withdrew its claim that amalgam is “safe,” retreating to the discomfoting claim that it is only “effective.”
- 2016: Parliament calls for complete phase-out. The ENVI committee of the European Parliament votes for a total phase-out of dental amalgam, then began negotiations with Council of Europe for a consensus solution.
- 2017: EU Mercury Law was enacted, with its strong amalgam provision. Implementation of the phase out comes in three phases: the virtual ban for children under 15 and for pregnant women, and breastfeeding women in 2018; the mandate for each Member State to submit a further phasedown plan in 2019; and the Commission to recommend a route to a phaseout, and a date, in 2020.
- 2017: Berlin Declaration: Gathering at a two-day Pan-European Summit to plan the end of amalgam, environmental and consumer NGOs, dental associations, Parliamentarians, academicians, and industry issued the “Berlin Declaration to End Amalgam Use in Europe in 2020.”
- 2018: Partial amalgam ban begins. Without noticeably less resistance from the shrinking number of dentists still using amalgam, with insurance shifts in the largest Member State Deutschland, and with smooth implementation even in former oppositional Member States like the U.K., the virtual partial ban begins.
- 2019: Four Member States joined Sweden in deciding to phase out amalgam: Slovakia, Czech Republic, Ireland, and Finland. Three of these are high amalgam users, a signal to the other three remaining high users (Slovenia, Greece, and Poland) that they too can phase out amalgam. *The high users not yet phasing out represent only 11% of the Member States with (coincidentally) only 11% of the post-Brexit population.*
- 2019: Full amalgam ban on French territory: the self-governing territory of Nouvelle-Calédonie adopts an absolute ban in September 2019. France Metropolitan also has changed drastically; the biggest user of amalgam in 2012 (says the BIOIS report) is now at the lower end of Member States users as a percentage,
- 2019: Lowest income country in Europe bans amalgam. Demonstrating that the end of amalgam is not a question of money, Moldova enacts a law ending amalgam use.
- 2020: Almost three-quarters of the Member States (17/27) are either under 10% use or have filed a plan to phase out amalgam. Environmental rules can never wait for 100% support; the 70% support far surpasses any of the complicated weighted voting systems.
- 2020: European stakeholders coalesce around ending amalgam use. For example: “From the point of view of the EurEau, the European Federation of Water Services, we have consistently favoured a phase out of dental amalgam according to the Swedish model. “

Amalgam placement requires removal of more tooth tissue, in sharp contrast to today's technology: the alternatives are minimally-invasive, tooth-friendly, and contribute to cavity prevention. This *primitive, tooth-unfriendly pollutant* – dating to the era of Napoleon III, Garibaldi, and Bismarck – has no place in 21st century dentistry.

The Council of European Dentists -- the last holdout for mercury fillings -- is a lobby group for the polluters: the dentists benefitting from a system that lacks the “polluter pays” principle. If the polluter paid, the real cost of amalgam would be prohibitively expensive. Here is the largest use of mercury in Europe – being subsidized by European governments who today pay the bill (the polluters skate) for the dangerous, far-reaching environmental releases wrought by dental amalgam.

Paying the heaviest prices *are the children of Europe who, are at manifest risk of neurological damage when dental mercury is released into the environment, e.g., from the fish or vegetables they eat.* **Certainly the health and safety of European children are more important than the inconvenience for some older dentists to switch to mercury-free dentistry.**

In contrast to many environmental decisions, the end of amalgam means *more jobs* for European workers, because Europe specializes in making minimally-invasive modern fillings, not in making amalgam.

All of the players, the stakeholders, including the majority of dentists and including three-fourths or more of the Member States, are ready – now – for mercury-free dentistry for Europe.

Sincerely,

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