

European Commission DG ENV

Study on potential for reducing mercury pollution from dental amalgam and batteries

(Ref. No. 07.0307/2011/594114/SER/C3)

Questionnaire to dental fillings manufacturers and suppliers

August 2011

This questionnaire aims to collect information to feed into the study on '**Potential for reducing mercury pollution from dental amalgam and batteries**' conducted by BIO Intelligence Service (BIO) for the European Commission (DG ENV).

The objective of this study is to provide the Commission with a solid evidence base in order to inform future policy actions with a view to addressing the environmental problems posed by the use of dental amalgam and mercury-containing batteries. The study includes:

- An in-depth analysis of current amounts of mercury used in dental amalgam and batteries in EU and the associated environmental impacts; and
- An impact assessment of possible policy options to reduce mercury pollution from these two applications, with recommendations for further policy actions.

Contrarily to previous studies covering these two issues, the present study aims to describe the full EU picture in a comprehensive manner, with a breakdown of data per Member State (MS), allowing us to identify any significant contrasts between MS.

An active participation of all stakeholders in providing relevant data is thus essential to help us build a robust evidence base and take into account the variety of situations across the EU when identifying possible policy options.

Many of the questions refer to information at country level; however, if you hold information at EU level please also include it in your responses.

This questionnaire also offers you an opportunity to provide suggestions for policy options that should be considered as part of the impact assessment.

If you have any **supporting documents and datasets that may be useful for this study**, we would be very grateful if you could submit this information with your reply to this questionnaire. You may also want to indicate specific **links to websites** containing useful information.

We thank you in advance for your time and participation.
Please do not hesitate to contact us for clarification or information regarding this questionnaire.

**Kindly send the completed questionnaires to mercury@biois.com
at the latest by 30 September 2011**

Alternatively, fax submission can be sent to:
+ 33 1 56 53 99 90 (BIO)

Hard copies of documents can be mailed to the following address:
20/22 Villa Deshayes – 75014 Paris – France

Contact persons: Shailendra Mudgal / Lise Van Long ☎ + 33 (0)1 53 90 11 80

■ CONTACT INFORMATION

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■ DENTAL AMALGAM

Q1: What is the quantity of mercury contained in dental amalgam **produced by your company?**

- Contained in capsules: _____tonnes of mercury/year
- Sold a liquid mercury: _____tonnes of mercury/year

Q2: What is the quantity of mercury contained in dental amalgam **used in your country?**

- Mercury in capsules: _____tonnes of mercury/year
- Mercury in liquid form for dentistry: _____tonnes of mercury/year

Q3: What share of your production is sold in the EU?

Q4: What is the average sale price of dental amalgam?

■ **MERCURY-FREE FILLINGS**

Q5: What are the quantities of mercury-free filling materials **produced by your company**?

- Composite materials: _____tonnes/year
- Glassionomers: _____tonnes/year
- Compomers: _____tonnes/year
- Ceramics: _____tonnes/year
- Other (please specify: _____): _____tonnes/year

Q6: What are the quantities of mercury-free fillings **used in your country** (tonnes/year)?

Q7: What share of your production is sold in the EU?

Q8: What is the average sale price of mercury-free filling materials?

Q9: In the next few years, is the market share of mercury-free fillings compared with dental amalgam expected to:

- Increase
- Decrease
- Remain stable
- Unknown

Q10: Apart from the mercury-related aspects, are there other environmental benefits or drawbacks associated with mercury-free fillings?

Q11: What are the latest technical improvements related to mercury-free dental restoration and mercury-free fillings?

- EQUIA from GC Link: <http://www.gceurope.com/products/detail.php?id=127>
 - ART (Atraumatic restorative treatment) for low developed countries

■ COMPANY INFORMATION

Q12: How many people are employed in your company?

Q13: What are the annual revenues of your company?

■ SUGGESTIONS FOR FUTURE POLICY ACTIONS

Q14: Should you wish to express any opinions on policy options that should be considered in order to reduce mercury pollution from dental amalgam, please complete the table below.

Possible EU policy actions	Are you in favour of this policy option? (Y/N)	Supporting arguments
No additional policy	<u>no</u>	_____
Increase enforcement of hazardous waste legislation	<u>yes</u>	_____
Require dentists to inform patients on the pros and cons of dental amalgam compared to alternative materials	<u>yes</u>	<u>aim: informed consent of patients</u>
Require dentists to give the choice to patients between dental amalgam and alternatives	<u>no</u>	<u>the dentist as health expert should use only mercury free products</u>
Implement policies to improve dental care and therefore reduce the need for dental fillings	<u>yes</u>	<u>information and incentives for cooperating patients; restriction for sugar products advertisement</u>
Make recommendations to MS in order to improve dentists' awareness of the mercury problem, starting from teaching programmes in dental schools	<u>yes</u>	<u>dentists have lack of toxicological knowledge</u>
Make installation of high efficiency amalgam separators and/or filters obligatory in dental clinics, complemented by obligatory and documented inspection and maintenance to be carried out by certified service suppliers	<u>yes</u>	<u>comment: in Germany already introduced</u>
Impose Hg emission thresholds from crematoria	<u>yes</u>	<u>each field, where mercury is used</u>

Possible EU policy actions	Are you in favour of this policy option? (Y/N)	Supporting arguments
		<u>and/or burdens the environment, must be regulated; no exemption!</u>
Make recommendations to MS concerning the revision of reimbursement schemes so that there are incentives for the use of alternatives to dental amalgam	<u>yes</u>	<u>as long as mercury fillings are legal, there must be an incentive to mercury-free fillings</u>
Phase out the use of dental amalgam - With identified exemptions (if so, which ones?) - With no exemptions	<u>yes, no exemptions</u>	<u>no patient needs dental amalgam; there are sufficient alternatives</u>
Other (please specify): <u>short time frame (max. 2 years) for phase out of mercury fillings</u>	<u>yes</u>	<u>practicable alternatives are available since many years</u>

■ **OTHER COMMENTS**

Please use the box below to provide any further information and comments that would be useful to the study, links to relevant public data source or reports, etc.

<p>1. Mercury waste from dental amalgam: not only the waste from dental clinics should be considered, but also the daily mercury excretion by amalgam bearers. Input = Output - Equation: Input = quantity of mercury placed in teeth; output = mercury drilled out + mercury daily excreted + mercury in deceased bodies (inhumation + cremation).</p> <p>2. Proposal: if and as long there is any exemption to a total ban of mercury in all products, a fee should be set up for each use of mercury for the aim of accelerating the migration to mercury free products. The fee should be taken as an ecological compensation for the exposure of the environment.</p>
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