

Short report from the DG SANCO meeting with Stakeholders, 20 January 2009

Two scientific committees, the Scientific Committee on Health and Environment Risks (SCHER) and Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) were given by DG SANCO (Health and consumer protection) the task to assess the environmental and health impacts of mercury dental amalgam and their alternatives, respectively. The preliminary opinions of the two committees were published in January 2008 and a public consultation was launched. NGOs and others commented and expressed their concerns on the analysis presented in the two reports. Finally in May 2008, the Sci. Com. published their final opinion.

No major changes were made in the final reports after the consultation, which led to the NGOs asking a meeting with the European Commission, DG SANCO.

On the Stakeholder Dialogue Meeting on Health and Environmental Risk Assessment of Dental Amalgams on January 20, 2009, four NGOs were represented. These included environmental NGOs (EEB), health NGOs (HEAL) and patients' NGOs - representing patients suffering from mercury from dental amalgam (Mercuriados (ES), "Non au mercure dentaire" (FR)). There were also representatives from environmental medical academies (European Academy for Environmental Medicine) and scientists of metal allergies (Melisa Medica Foundation). From the EC side there were representatives from DG Health and Consumer Protection (SANCO), DG Environment. There were also representatives from the two committees - SCENIHR and SCHER who were involved in the assessment process.

Procedural clarifications

During the meeting SCENIHR and SCHER representatives provided stakeholders with information on how they reached their conclusions on the two opinions on dental amalgam (health and environmental aspects). They explained how the work was organised and how evidence was considered. It was concluded from their process that they did what they could with the time and resources available and therefore issues such as feedback to individual responses were not possible. It was confirmed that all the comments on the consultation response forms were read and discussed on substance. On the basis of these discussions changes were made to the preliminary reports or it was decided that the information provided would not influence the assessment.

Concerning the authors' expertise in the mercury area, mainly for the SCENIHR, it was confirmed that they did have the experience both from a toxicologist point of view as well as an immunologist background.

The response to the comments on the SCENIHR report

NGOs presented and explained the link between mercury in dental amalgam to allergic diseases and other diseases such as atopic eczema, Alzheimer's disease and autism. SCENIHR answered that adverse effects from mercury is very individual and only happen to some people. Further, other factors such as chemical hypersensitivity can not be excluded. With mercury poisoning, the symptoms can also be caused by other attributes. SCENIHR stated that alternatives are not safe either; we know less about them than mercury dental amalgam.

SCENIHR explained that alternatives are more expensive than mercury dental amalgams. Some people might not be able to afford alternatives such as composites. It may be easier for rich countries, such as rich Nordic countries to make the switch, but other EU regions might not be able to afford alternatives to mercury amalgams. However, the NGOs noted that the full cost (such as environmental costs) has not been taken into account when talking about the price of amalgam fillings.

The Patients' NGO pointed out that the message the report conveys is that there is no health risk from mercury dental amalgams. This message was also conveyed by the Spanish dental association to their member dentists. Further, dentists need to give information to their patients about the possible adverse health effects from mercury dental amalgam. SCHENIR stated that it is a terminology matter and it was never said in the assessment that there is no risk. The statements made in the report were also based on the approach used which was based on limited data and time.

DG SANCO noted down the point that more information should be given to patients about possible adverse effects by mercury dental amalgam.

The response to the comments on the SCHER report

The environmental NGOs stated that SCHER has failed to consider all pathways of mercury releases, emissions and exposures due to dental amalgam such as municipal waste incineration, landfill, vapors, leachate, medical waste disposal, crematories, cemeteries, sludge incineration/disposal. Since all the pathways have not been considered the assessment has underestimated dental mercury conversion to methyl mercury. SCHER has not considered many relevant, peer-reviewed data and information that indicate a significant risk. The scenarios used in the risk assessment are not representative for the whole of the EU. This is also commented on in the KEMI letter.

SCHER stated that they considered all data as far as possible, due to time constraints and limitations of resources these are the conclusions that could be made at this point. They emphasised that only a screening level risk assessment was performed and not a comprehensive risk assessment. There is a lack of data and the assessment was based on few studies.

SCHER stated that other pathways were considered in this assessment. Crematoria were mentioned but since it is a screening risk assessment and there was little data it was not covered. What they would need is evidence of deposition around crematoria, and concentrations of mercury, data which they did not have. Sludge was taken into account with the soil assessment conclusion.

SCHER stated that worst case scenarios were used in the assessment. They used worst case scenarios on Swedish data where the separators did not work well, where there was only 2 % efficiency.

The conclusion was that the scientific committees did identify the limitations of the assessment in the reports. It clearly says in the reports that the assessment is based on an approach performed under a limited time, with limited data and that it was only a screening level risk assessment. It was not concluded in the two reports that there is no risk on health or the environment.

Next steps:

DG SANCO will write a report from this meeting. They will pass this report and comments to the newly formed Scientific Committees (around March 2009). The Sc. Com will consider this report and give comments back to DG SANCO who will pass it to the stakeholders – the NGOs involved on that meeting.

For the environment side, whether a more comprehensive risk assessment is to be carried out, this would be a decision for DG ENV to make and they will have to put the resources to it.