

General question: Do you agree with the general observations made by the SCENIHR?

These comments are submitted on behalf of the 586 doctorate university professors, physician and dentist members of the International Academy of Oral Medicine and Toxicology. Founded in 1984, the IAOMT now has chapters in 14 countries. For more than 20 years in an effort to bring evidence based research into clinical dental practices we have funded and subsidized numerous unbiased university scientific research projects on the toxicology of dental materials and our Scientific Advisory Board is regularly consulted by the US FDA dental branch.

The IAOMT concurs that the careless removal of mercury fillings is potentially dangerous, however it can and should be prevented.ⁱ (IAOMT 1985)

Conversely, placement of a mercury/silver filling also exposes everyone present to a similar bolus dose of mercury vapor and is not safe. Vimy's research shows and the WHO Criteria 118 consensus confirms that the total dose of mercury from the installation and chronic exposure to mercury from mercury/silver fillings is considerably greater quantitatively than from a single episode of amalgam removal.

Snapp et al. reported, "Removal of the amalgams provided an additional exposure of 1.46 (SD = 1.17) ng Hg/mL that was rapidly cleared from the blood with a half-time of 2.9 days". He showed a 90% drop in total blood mercury in 214 days after amalgam removal.ⁱⁱ (Snapp 1989)

Mercury is a toxic substance that can precipitate or aggravate numerous adverse health effects especially in women and unborn babies. A case controlled study found significant harm to women in dentistry.ⁱⁱⁱ (Rowland 1994) This report fails to warn women in dentistry about infertility and reproductive harm or even death.^{iv v vi}
^{vii}(Radzislav 1987) (Cook 1969) (figa 2006) (Gelbier 1989)

The Report's fails to adequately warn about amalgam use in a pregnant women or child although the manufacturers themselves

caution against it.^{viii} (Dispersalloy_Dentsply_Caulk) Trasande 2005 estimated IQ damage due to mercury costs the US \$8.7 billion dollars a year.^{ix} The mercury is predominantly from amalgams in the mother's teeth and genetic subsets especially boys who do not effectively excrete mercury have been identified as at risk of neurological harm.^{x xi} (Holmes 2003) (Rose 2008)

When medical experts have considered the available evidence of exposure to mercury from amalgam they arrived at vastly different conclusions than the present report.^{xii xiii xiv xv} (USFDA_cdrh_USPHS_2006.GOV), (Friberg 1994), (Haley 2005) (mutter 2004)

In 1926 Dr. Alfred Stock measured mercury released from set amalgam.^{xvi} (Stock 1926) Vimy measured mercury released during chewing^{xvii} (Vimy #1 1985) and over time.^{xviii} (Vimy #2 1985)

In both sheep and monkeys Vimy found mercury from amalgam fillings distributed widely.^{xix xx} (Hahn 1989) (Hahn 1990)

Mercury from the sheep's fillings entered the fetus and after birth entered the young lamb through the mother's milk. Mercury in a mother's teeth enters her milk. While tissue levels increased continuously blood and urine remained relatively low demonstrating precisely why they are not useful in determining exposure.^{xxi} (Vimy 1990)

Elemental mercury vapor causes pathophysiology.^{xxii xxiii} (Palkiewicz 1994) (Boyd 1990) Minute amounts of mercury cause changes in neurons in culture similar to human neurological disorders.^{xxiv} (Leong 2001) The available data does not allow mercury from amalgam fillings to be excluded as the probable source of the mercury in neurological disorders and developmental disorders.

ⁱ laomt_in_vivo_1985

http://www.iaomt.org/articles/category_view.asp?intReleaseID=288&catid=30

ⁱⁱ Snapp_J_Dent_Res_1989

ⁱⁱⁱ Rowland_Toxicologist_1994

^{iv} Radzislav_Arch_Occuo_Environ_Health_1987

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- ^v Cook_British_Dent_J_1969
- ^{vi} Gelbier_Public_Health_1989
- ^{vii} figa_occup_medicine_2006
- ^{viii} Dispersalloy_Dentsply_Caulk
http://www.caulk.com/assets/pdfs/products/Dispersalloy_capsules_dfu.pdf
- ^{ix} Trasande_Environ_Health_Perspect_2005
- ^x Holmes_Int_J_Toxicol_2003
- ^{xi} Rose_Am_J_Biochem_Biotec_2008
- ^{xii} mutter_Neuroendocrin_Ltr_2004
- ^{xiii} USFDA_cdrh_USPHS_2006.GOV
<http://www.fda.gov/cdrh/meetings/090606-summary.html>
- ^{xiv} Friberg_ISBN_3-13-102471-2_1994
- ^{xv} mutter_Int_J_Hyg_Envir_Health_2004
- ^{xvi} Stock_J_Applied_Chemistry_1926
- ^{xvii} Vimy_J_Dent_Res1_1985
- ^{xviii} Vimy_J_Dent_Res2_1985
- ^{xix} Hahn_FASEB_1989
- ^{xx} Hahn_FASEB_1990
- ^{xxi} Vimy_American_Physiology_Society_1990
- ^{xxii} Palkiewicz_J_Neurochemistry_1994
- ^{xxiii} Boyd_Am_J_physiol_1990
- ^{xxiv} Leong_NeuroReport_2001