

IAOMT SCIENTIFIC ADVISORY BOARD
POSITION PAPER ON DENTAL AMALGAM

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Chronic exposure to mercury, even in minute amounts, is known to be toxic and poses significant risks to human health. Current scientific evidence clearly demonstrates that dental amalgam unnecessarily exposes dental patients to substantial amounts of mercury vapor, particulates and other forms and is therefore not a suitable material for dental restorations.

It is incompatible with current valid scientific evidence to continue to endorse or otherwise condone the use of a permanently implanted material in teeth that continuously emits a very potent enzyme inhibitor and metabolic toxin. Moreover, mercury's damaging influence on the developing brain makes dental amalgam an entirely inappropriate material for use in children and women of childbearing age.

Countries to include Canada, the United Kingdom, France, Germany, Sweden, Norway, Japan and Taiwan have either voluntarily abandoned the use of dental amalgam or, under government mandate, placed restrictions and/or issued advisories against its use. In September of 2006, a joint panel of FDA scientific experts rejected a FDA whitepaper's assurances of the safety of dental amalgam. Furthermore, in 2008, FDA modified its website with respect to its prior claims of 'amalgam safety' to read, in part, "Dental amalgams contain mercury, which may have neurotoxic effects on the nervous systems of developing children and fetuses".

In light of the above facts and the trajectory of the emerging science implicating dental amalgam in a wide variety of confounding medical problems, the International Academy of Oral Medicine and Toxicology and its Scientific Advisory Board 1 urge FDA to exercise one of three regulatory options in order of preference:

1. Ban dental amalgam from commerce in accordance with section 516 of the Food, Drug and Cosmetic Act;
2. Initiate a cease distribution and mandatory recall order with respect to dental amalgam in accordance with the provisions of CFR 21 part 810;
3. Regulate encapsulated amalgam as a class III medical device consistent with CFR 21 860;

Finally, physicians and dentists should, where patients are suffering from pathological states and diseases of unclear causation, consider whether exposure to mercury released from dental amalgam fillings might be an exacerbating factor in such adverse health conditions.

Respectfully submitted,

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