

# President's Column

## DEALING WITH AMALGAM WASTE



Dr. John Diggins

As president, I have placed great emphasis on CDA's role of managing national issues on behalf of the profession, and interfacing with the federal government. These two facets of our mandate are complementary, as successful issues management is often achieved through effective government relations.

The profession and government worked closely to good effect a number of years back when the safety of dental amalgam came into question and both parties were named in a class action suit. We knew it was Health Canada's role to regulate the safety of the material, while CDA convened the best available scientific evidence on the subject and communicated this information to government, the Canadian public and the profession. Health Canada still approves amalgam as a safe and effective dental material.

The amalgam issue has resurfaced from a new perspective. In December 1999, CDA received correspondence from O'Connor Associates Environmental Inc., which has been commissioned by Environment Canada to investigate and quantify the environmental impacts

associated with mercury released through the use of amalgam in dentistry.

The goals of this investigation are:

- to develop a mass balance for mercury used in and released by dentistry in Canada;
- to review and assess the potential environmental/ecological impacts of these mercury emissions;
- to investigate substances released through use of alternative dental restorative materials; and
- to review risk management/risk reduction methods and equipment that could be used to reduce the release of mercury due to amalgam use.

This investigation is taking place within the context of the Canada-Wide Environmental Standards Sub-Agreement, an initiative of the Canadian Council of Ministers of the Environment. Under this initiative, the ministers work together to address key issues in the areas of environmental protection and health risk reduction. The standards are generally developed using a firm scientific foundation and a risk-based approach. They propose numeric limits for discharges, a timetable for attainment, and a framework for monitoring progress and reporting to the public.

Standards have already been proposed that should reduce mercury emissions from two major sources: metal smelting and incineration. The O'Connor Associates report is meant to provide important input into the development of standards for dealing with dental amalgam waste disposal.

The good news is that the safety of amalgam per se is not at issue and Environment Canada has no wish to see changes to the way dentistry is practised with regard to the use of amalgam. The department has also indicated that they wish to develop a memorandum of understanding with CDA on amalgam.

Our major concerns with Environment Canada's initial position on amalgam waste are: they see no qualitative difference between the bound mercury in waste amalgam and pure mercury, their

risk analysis is based on assumptions and a real lack of data, and they see no reason to do further research to get better data upon which to base their risk analysis. Their estimates of the cost of amalgam separation and waste disposal also seem to be based on fairly speculative data.

Canadian dentists are well aware of the problems caused by the environmental release of mercury and, as a group, we want to act responsibly to minimize the environmental impact of dental practice. Because access to dental care is closely related to cost, it is in the best interest of patients that any regulatory requirement which increases the cost of dentistry be justified.

I have written to Environment Canada seeking clarification about why they appear to consider waste amalgam to be no safer than free mercury and why they see no need for further research into the potential for the release of mercury from amalgam waste evacuated from Canadian dental offices into sewer systems.

I believe strongly that more research needs to be done and that no far-reaching regulations should be introduced without first having a sound scientific basis. We believe it is also very important for government, the ultimate regulators, to officially recognize the difference between free mercury and that which exists in a bound form in waste amalgam.

CDA will continue to work towards an understanding on waste amalgam with Environment Canada that will provide the maximum benefit for Canadians and the environment. Our position is to make decisions based on the best available information. Scientific evidence is key, and we are ready to "move with the science" as it develops. Of course, we are conscious that science is not the only input in government decision making; however, we want to make sure that decisions affecting the delivery of oral health care in this country are made on as rational a basis as possible.

*John Diggins, B.Sc., DMD, MSD  
President of the Canadian Dental Association*