

**IAOMT SCIENTIFIC ADVISORY BOARD**  
**POSITION PAPER ON DENTAL AMALGAM**

8297 ChampionsGate Blvd., #193

ChampionsGate, FL 33896

Tel 863-420-6373

Fax 863-419-8136

IAOMT.org

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,

Boyd Haley, PhD, FIAOMT, chairman. Professor and former Chairman of the Department of Chemistry, University of Kentucky; permanent member, NIH Biomedical Sciences, Study Section.

Thomas Burbacher, PhD, Associate Professor of Environmental and Occupational Health Sciences, Research Affiliate, Center on Human Development and Disability, Director, Infant Primate Research Laboratory, University of Washington Center for Human Development and Disability.

Louis W. Chang, PhD, Emeritus Professor of Pathology, University of Arkansas for Medical Sciences, Founding Director of the Taiwan Division of Environmental Health & Occupational Medicine.

H. Vasken Aposhian, PhD, Professor of Cellular and Molecular Biology, Professor of Pharmacology, University of Arizona, College of Medicine.

Herbert Needleman, MD, Professor of Child Psychiatry and Pediatrics, University of Pittsburgh school of Medicine.

Maths Berlin, MD, PhD, Advisor to this Committee. Professor Emeritus of Environmental Medicine, Medical Faculty of Lund, Sweden. Dr. Berlin was the chairman of two World Health Organization conferences on mercury exposure in 1991.