

Comments on WHO Discussion Paper: Draft Global Oral Health Action Plan (2023-2030)

The European Center for Environmental Medicine is concerned that this draft Global Oral Health Action Plan does not **reflect the global progress of the transition to mercury-free dentistry** according to the Report of the Informal Global WHO consultation with policymakers in dental public healthⁱ and the reporting to the Minamata Convention.

At COP4 countries have unanimously voted in favor of going beyond the proposed measures according to Annex A Part II of the Minamata Convention and decided to protect vulnerable populations from dental amalgam.

The new Children's Amendment requires Parties to "Exclude or not allow, by taking measures as appropriate, or recommend against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women, except when considered necessary by the dental practitioner based on the needs of the patient."

Most Countries have already implemented two or more of the recommended measures to phase down dental amalgam. **56** Countries actually fulfill the requirements to protect children in line with the Minamata Convention and the number is expected to reach **150** (77%) **by 2025** according to ongoing regulations.

Representing a worldwide consensus to protect these most vulnerable populations, implementation of the Children's Amendment should be added as a global target and included in the monitoring framework in the Global Oral Health Action Plan:

Global target: Mercury-free dental care for vulnerable populations

By 2025, at least 90% of the countries will have excluded or not allowed, by taking measures as appropriate, or recommended against the use of dental amalgam for the dental treatment of deciduous teeth, patients under 15 years, and of pregnant and breastfeeding women.

Further **24** Countries have generally phased out dental amalgam or declared not to use it at all and, according to National Plans and ongoing regulations the number is expected to reach **80** (41%) **by 2030**. In the Europe and Americas regions, as many as **two-thirds** of countries have either phased out the use of dental amalgam or expect to do so **by 2025**.ⁱ

Setting a global target in the Global Oral Health Action Plan will further the general transition to mercury-free Dentistry:

Global target: Phase out of dental amalgam use

By 2030, at least 75% of the countries will have phased out dental amalgam use.

To reach these targets, the Global Oral Health Action Plan should include the following actions (as proposed by the **World Alliance for Mercury Free Dentistry**):

Proposed actions for Member States:

- ***Encourage professional organizations and dental schools to educate and train oral health professionals and students on the prohibition of or recommendation against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***

Actions for the WHO Secretariat:

- ***Hold to account economic operators in the production and trade of dental amalgam. Encourage private sector transparency and alignment with regulations and voluntary codes of practice to reduce the marketing, advertising and sale of dental amalgam.***
- ***Develop technical guidance on excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***
- ***Develop infographics, fact sheets, and posters on excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***

Proposed actions for international partners:

- ***Provide platforms to share lessons learned and key success factors as countries phase out amalgam use.***
- ***Develop infographics, fact sheets, and posters on excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***

Proposed actions for civil society organizations:

- ***Advocate for the phase out of dental amalgam.***
- ***For academic training institutions, support implementation of the global oral health action plan by educating students about phasing out amalgam use and excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***

Proposed actions for the private sector:

- ***Discontinue manufacturing, exporting, and importing dental amalgam.***
- ***Discontinue marketing, advertising, and selling of amalgam for use in treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***
- ***Include labeling on amalgam warning against use in treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women.***

Additionally, the Children's Amendment and other effective steps toward an amalgam phase-out should be incorporated throughout the Global Oral Health Action Plan. For example (with updated provisions in bold italics):

- “Proposed actions for Member States...Action 43. Reform oral health workforce training programmes:...Encourage professional organizations and dental schools to educate and train oral health professionals and students on the use of mercury-free dental restoration alternatives; ***on the prohibition of or recommendation against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women***; and on promoting best waste management practices of materials used in oral healthcare facilities.”
- “Proposed actions for Member States...Action 60. Promote mercury-free products and minimal intervention: ***Exclude, not allow, or recommend against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women***. Advocate for the prevention and treatment of dental caries with minimal intervention. Restrict the use of dental amalgam to its encapsulated form. Promote the use of mercury-free alternatives for dental restoration. Discourage insurance policies and programmes that favour dental amalgam use over mercury-free dental restoration.”
- “Proposed actions for Member States...Action 61. Reinforce best environmental practices: In collaboration with the ministry of environment, ensure that measures to reduce the environmental impact of oral health services are put in place, including minimising waste, carbon emissions and use of resources. Use best environmental practices in dental facilities – ***most importantly, using mercury-free products, especially for treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women*** – to reduce releases of mercury and mercury compounds to water and land.”
- “Actions for the WHO Secretariat...Action 65. Accelerate implementation of the Minamata Convention on mercury: In collaboration with the UN Environment Programme, support countries in implementing the provisions of the Minamata Convention on Mercury, particularly those related to the phase down in use of dental amalgam ***and excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women*** in the framework of the WHO GEF7 project on “Accelerate implementation of dental amalgam provisions and strengthen country capacities in the environmental sound management of associated wastes under the Minamata Convention”. Develop technical guidance on environmentally-friendly and less-invasive dentistry. Develop technical guidance on ***excluding, not allowing, or recommending against the use of dental amalgam for the dental treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women***.”
- “Proposed actions for the private sector....Action 71. Commit to sustainable manufacturing: Develop, produce and market oral health care products and supplies that are cost-effective, environment-friendly and sustainable. ***Discontinue manufacturing, marketing, advertising, and selling of amalgam for use in treatment of deciduous teeth,***

of patients under 15 years and of pregnant and breastfeeding women. Include labeling on amalgam warning against use in treatment of deciduous teeth, of patients under 15 years and of pregnant and breastfeeding women. Engage with governments to improve availability and affordability of such products through bulk purchasing and other cost-saving public procurement approaches. Accelerate research and development of new mercury-free, safe and effective dental filling materials.”

We urge WHO to update its draft Global Oral Health Action Plan, and to engage in a committed effort to phase out dental amalgam.

The **WHO GEF7 project** on “Accelerate implementation of dental amalgam provisions and strengthen country capacities in the environmental sound management of associated wastes under the Minamata Convention” should be used accordingly **to protect human health and the environment from harmful effects of mercury through implementation of policies and improved practices to phase down or phase out the use of dental amalgams.**

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ⁱ *Report of the Informal Global WHO Consultation with Policymakers in Dental Public Health, 2021,*
https://www.mercuryconvention.org/sites/default/files/documents/information_document/4_INF26_DentalAmalgamWHO.English.pdf