Freya B. Koss President and Founder PA Coalition for Mercury-Free Dentistry

WRITTEN TESTIMONY – DENTAL AMALGAM FACT SHEET

My name is Freya Koss, I am the president and founder of the PA Coalition for Mercury-Free Dentistry. I initiated the introduction of the USE OF MERCURY IN DENTISTRY Ordinance requiring the informed consent dental amalgam fact sheet, championed by City Councilwoman-at-large Blondell Reynolds Brown in 2007. The rule mandates dentists to inform their patients of the health risks associated with exposure to mercury from silver amalgam fillings.

We were dismayed at Dr. Schwarz's June 24 announcement that the current amalgam fact sheet would be "slimmed down" by eliminating warnings related to the health consequences of mercury amalgam fillings, to be substituted with new warnings advising of the risks of bisphenol-a ("BPA") in composites. We understand that this decision was based on the findings of a single article by Maserejian,N., et al., *Dental Composite Restorations and Psychosocial Function in Children.*

We are not opposed to legitimate warnings concerning composite restorations. Our concern is that unsubstantiated warnings about BPA in composite resins are replacing scientifically proven warnings of mercury exposure from amalgam fillings. By doing so, the Dept of Health is misleading the public by steering them away from composite fillings when the weight of evidence clearly demonstrates that composite fillings are relatively safe and mercury fillings are a potential risk to health.

Further, it is apparent by the proposed fact sheet, that the preponderance of scientific evidence substantiating the dangers of mercury fillings has not been reviewed nor acknowledged by the Dept of Health. One such survey by G.M. Richardson, that had been submitted to the Department of Health, "Mercury Exposure and Risks from Dental Amalgam in Canada…"

concluded that “mercury exposure from mercury fillings is toxicologically significant and BPA exposure from composite fillings is not. Among Richardson’s points:

- Mercury exposure from dental amalgam exceeds international health agencies’ acceptable, tolerable, or “safe” levels for the general public.
- Dental amalgam is not an essential dental filling material, as there are suitable and effective alternatives, such as composite resins, as evidenced by countries that have either restricted and/or entirely banned the use of amalgam, such as Sweden, Denmark and Norway.
- Exposure to BPA in composites, are hundreds to thousands of times less than the referenced safe exposure levels.
- There is no evidence based on direct measurement of BPA exposure from composite fillings to subsequent health effects.

Based on Richardson’s research, he also concludes that the environmental concerns related to BPA release from composites has been unfounded in any scientific information.

In addition, the very same authors who wrote the Maserejian article, which was apparently the basis of the revised fact sheet, recently published a follow-up article in which they concluded, “the neurobehavioral effects seen in children from composites were small and that further studies were needed.” The authors further concluded that “dental composite restorations had statistically insignificant associations of small magnitude with impairments in neuropsychological test change scores over 4- or 5-years of follow-up in this trial.” [Maserejian,N., et al., Dental composite restorations and neuropsychological development in children: Treatment level analysis from a randomized clinical trial, NeuroToxicology (2012).]

Commissioner Schwarz, at the June 24 meeting, you asked, “Do we all agree that children

should have carries filled?" The answer of course was a unanimous, "yes". Your question may have been prompted by action taken by certain Philadelphia dental offices and clinics serving the lower socio-economic community and the disabled" such as the Special Smiles clinic, which we understand had refused to provide treatment including restorative and non-restorative treatments unless parents would sign the fact sheet, thereby consenting to the use of mercury fillings. As Commissioner of the Board of Health and a licensed pediatrician, we understand your concern that children who are not treated with mercury fillings may not receive restorable treatment at all. As noted at the June 24 meeting, the PA Department of Welfare covers the cost of non-mercury alternative fillings, a point which you acknowledged. Paul R. Westerberg, DDS, MBA, Chief Dental Officer for the Pennsylvania Department of Public Welfare, confirmed in an email to me (attached) that Pennsylvania "offers dental coverage for both composite resin and amalgam restorative materials under the Medical Assistance Program.", which according to the PA Department of Public Welfare, has been in effect since at least 1988. The fee schedule for these fillings may be found at this website:
http://www.dpw.state.pa.us/ucmprd/groups/webcontent/documents/document/p 002906.pdf.

The documentation of the dangers posed by mercury fillings has only crystallized since the Dept of Health first published its fact sheet, as evidenced by documentation and exhibits included in a letter to Commissioner Schwarz by James Love, an attorney for the International Academy of Oral Medicine and Toxicology who has been interested in the mercury amalgam issue for over twenty-two years and the principal author of two of the amalgam Citizens' Petitions to the FDA. We encourage you and your staff to review to review the materials submitted and vote to retain and even strengthen the mercury amalgam warnings that currently exist on the Department of Health's dental amalgam fact sheet. Relying on questionable and unsubstantiated resources belies the intention of the Department to protect the public.