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World Alliance
for Mercury-Free
Dentistry

To: Mr. Mike Nesbitt MLA
Minister
Department of Health
Castle Buildings
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Belfast
Northern Ireland
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By email: Private.Office@health-ni.gov.uk

24th June 2024

Re. **Request for a Meeting - Phase out of Dental Amalgam by 1 January 2025**

Honorable Minister Nesbitt,

The EU Decision to phase out dental amalgam by 1 January 2025 was recently signed and will soon enter into force. Since the Regulation also applies to Northern Ireland we are encouraging you to prepare for its implementation.

These days you have significantly increased the reimbursement rates for dental treatments in the NHS: 5% for all treatments and even 30% for endodontic treatments, extractions and all fillings (with a volume of more than £4m). Dentists should be pleased, but a measure to alleviate the phase out of dental amalgam for consumers, such as introducing the reimbursement of alternatives for adults, is still missing.

The Department of Health prepared an [impact assessment for the phase out](#) and submitted it to the Windsor Framework Committee (on 18 April), but there are doubts that the estimation of £3.6m may be overstated. Other calculations arrive at less than £1m (!), should the existing reimbursement fees for composite for children be introduced for adults. In response to our request for clarification, the DoH Chief Dental Officer submitted a [statement on 17 June](#), without clarifying the expected level of new fees for composite in the impact assessment, which may have explained the estimation. However, the impact assessment may already be outdated due to the recent adjustments and should be revised. In any case, the calculation should be made transparent to ensure a balanced political decision.

We would like to highlight that other European countries have already replaced dental amalgam in public insurance systems with a moderate increase in fees, demonstrating that the transition to alternatives is well feasible, whilst not losing sight of the dentists' business model.

In Poland, for example, fillings are 100% reimbursed and, **since October 2022**, all patients have free access to restorations with glass ionomer cements, high-density glass ionomer cements or resin-reinforced glass ionomer cements, while dentists can still charge privately for higher-quality fillings, such as those made of multi-layer composite. The increase of the reimbursement fees for fillings in Poland was on average 30%.

France adapted its reimbursement **in October 2023** by reducing the contribution from 70 % to 60 % while increasing the reimbursements for fillings by an average of 55 %. In **Estonia**, the public health service contributes to 50% of the cost of dental fillings and increased the fees by 70% **in April 2024**, with a cap of max. €60 per year for patients.

We would also like to highlight that the drying up of the supply of dental amalgam in the EU is making a change in the reimbursement system unavoidable.

Most manufacturers of dental amalgam have left the business due to the introduction of the requirements of the Medical Device Regulation in 2021. All old certificates have expired by 26 May 2024 and it seems that no-one was willed to enter into contract for an MDR assessment in order to obtain a further extension, since the market is dying out due to the EU Regulation anyway. So where should NI dentists get their amalgam from, when no capsules can be imported without CE conformity? Only stocks may be sold off. (Further information: <https://environmentalmedicine.eu/manufacturers-exiting-the-amalgam-business-in-europe/>)

Dental Amalgam consists to 50% of highly toxic mercury and should be phased out because of the risk to health and the environment. Not only in the EU, but also in Northern Ireland. The BDA has an obvious financial interest in keeping dental amalgam: Dentists are benefitting from selling alternatives as a special more expensive treatment - a business model which they see at risk when composites will be reimbursed by the NHS.

But, the interest of around 700 dentists, which support the BDAs position, should not take precedence over the interest of the general population and the future generation. Consumer should have access to less expensive and safe alternatives in Northern Ireland, like consumers have in other countries.

We cordially ask you for a personal meeting to present you the position of the civil society.

Yours sincerely,



Florian Schulze

Administrative Vice President of the World Alliance for Mercury-Free Dentistry
Managing Director of the European Network for Environmental Medicine

Cc: Dr. Graeme Munro-Hall, UK
Chief Dental Officer of the World Alliance for Mercury Free Dentistry