

26. June 2020

Subject: NGOs, professionals associations, and academics ask ban dental amalgam exports from EU

The Honourable Executive Vice-President,
The European Commission and Commissioner for the Green Deal Frans Timmermans

Excellency,

As Executive Vice President of the World Alliance for Mercury-Free Dentistry and head of the alternative Secretariat in Dhaka, I bring to your attention this petition from 51 NGOs, dental associations, and dental leaders calling for the end of amalgam exports from Europe, which absolutely must accompany the phase-out of use in Europe -- else Europe will end up selling products that it has found too toxic to use.

With regards,
Shahriar Hossain, Ph.D.

Support banning dental amalgam exports from the EU

We, the undersigned NGOs from non-EU countries, support the workshop background document *Assessment of the Feasibility of Phasing Out Dental Amalgam*'s conclusion that dental amalgam should not be exported to other countries: "The phase-out in OP1, OP2 and OP3 would not be applied only on the use of dental amalgam in restoration, but also the manufacturing, *export* and import of dental amalgam (including encapsulated items)."^[1] We urge the Commission to recommend a ban on amalgam exports to our countries because:

- 1. *Developing countries cannot control mercury waste from amalgam:*** Amalgam waste management is not affordable or practical in developing countries that have neither the infrastructure to collect, transport, and store mercury waste from amalgam, nor the resources to enforce regulations requiring it for generations to come. If the EU continues to export amalgam, it will contribute to the costly and dangerous mercury waste problem in other countries.
- 2. *Dental mercury pollution crosses national borders:*** The largest user of dental mercury in the world is the European Union at 90 tonnes per year.^[2] The resulting mercury pollution crosses national borders, making it a concern in our countries too. Currently, amalgam use is low in many developing countries. If the EU continues to export amalgam, its use will increase and a part of the resulting mercury pollution could very well end up right back in the EU.
- 3. *Our children deserve as much protection as EU children:*** The European Union has banned amalgam use in children, pregnant women, and breastfeeding mothers in addition to taking steps to protect them from future dental mercury pollution by phasing out all amalgam use. But if the EU continues to export amalgam, our children will be subjected to a double dose of amalgam's mercury: first when it is implanted in their teeth and a second time when it contaminates their environment.

We applaud the EU for working to phase out its own use of dental amalgam. But in order to lead the world effort to stop mercury pollution, we urge the EU to stop dumping dental amalgam in other countries via exports, especially to developing countries. Thank you in advance for taking our perspective into consideration.

Africa

- Dominique Bally, Centre Africain for la Santé Environnementale (Côte d'Ivoire)
- Prof. Godwin Toyin Arotiba Dentists' Committee for a Mercury Free Africa (Nigeria)
- Attorney Wondwossen Sintayehu, Destiny Ethiopia (Ethiopia)
- Dr. Gilbert Kuepouo, Centre de Recherche et d'Education pour le Développement (Cameroun)
- Amefgadze Kokou Elorm, Les Amis de la Terre (Togo)
- Adetonah Sounkoura Sidibe, GAPROFFA (Bénin)
- Leslie Adogame, Sustainable Research and Action for Environmental Development (Nigeria)
- Robert Tumwesigye Baganda, PROBICOU (Uganda)
- Dorah Swai, AGENDA (Tanzania)
- Ibrahima Sory Sylla, Carbone Guinée (Guinea)
- Emmanuel Odjam-Akumatey, Ecological Restorations (Ghana)
- Griffins Ochieng, Centre for Environment Justice and Development (Kenya)
- Dr. Najoua Bouraou, Association pour la protection de l'environnement et le développement durable de Bizerte (Tunisia)
- Maimouna Diene, Pan Africa (Senegal)
- Nathan Makuregye, Eastern Africa Greens Federation (Uganda)
- Tom Aneni, Sustainable Environment Development Initiative (Nigeria)
- Bernard Elia Kihyo, Tanzania Consumer Advocacy Society (Tanzania)
- Daniel Maina, Kisiwani Conservation Network (Kenya)
- Nshimirimana Jean Donatien, Proprete, Environnement et Santé (Burundi)
- Michael Musenga, Children's Environmental Health Foundation (Zambia)
- Joy Onyinye Mamah, Heroine Women Foundation (Nigeria)
- Solomon Kusi Ampofo, Friends of the Nation (Ghana)

Asia

- Siddika Sultana, Asian Centre for Environmental Health (Bangladesh)
- Yuyun Ismawati, Nexus for Health, Environment, and Development (Indonesia)
- Dr. Naji Kodeih, INNODEV -Lebanon and IndyACT (Lebanon)
- Satish Sinha, Toxics Link, (India)
- Dr. Humayun Kabir Bulbul, Bangladesh Dental Society-BDS (Bangladesh)
- Ram Charitra Sah, CEPHED (Nepal)
- Dillip Pattanaik, OSVSWA, and National Alliance on Mercury Free Dentistry (India)
- Syed Marghub Murshed, Environment and Social Development Organization-ESDO (Bangladesh)
- Lien To, Center for Community Health and *Injury Prevention* (Vietnam)
- Mohideen Abdul Kader, Consumers Association of Penang (Malaysia)
- Reynaldo M. San Juan, Jr. BAN Toxics (Philippines)

- Hemantha Withanage and Chalani Rubesinghe, Centre for Environmental Justice (Sri Lanka)
- Prof. Dr. Nguyễn Huy Nga, Dean, Public Health & Nursing. Quang Trung University (Vietnam)
- Ziyad Alalawneh, Land and Human to Advocate Progress (Jordan)
- Meenakshi Raman, Sahabat Alam / Friends of the Earth, (Malaysia)
- Eng. Marie Therese Merhej Seif, Human Environmental Association for Development (Lebanon)

The Americas

- Maria Carcamo, Latin American Centre for Environmental Health, and RAPAL (Uruguay)
- Fernando Bejarano, RAPAM-CAATA (México)
- Karen Howard, Organic and Natural Health Association (USA)|
- Placido Silva, Sustainable Development Network (Colombia)
- Tracy Gregoire, Learning Disabilities Association of America (USA)
- Sherika Whitelocke-Ballingsingh, Caribbean Poison Information Network (Jamaica)
- Eric Uram, Chicago Declaration to End Dental Industry Mercury Use (USA)
- Maria Gil-Beroes Fundacion Aguaclara (Venezuela)
- Michael Bender, Mercury Policy Project (USA)
- Dra. Rebeca Monroy Torres, Observatorio Universitario de Seguridad Alimentaria y Nutricional (México)
- Sylvia Dove, Consumers for Dental Choice (USA)
- Tai Pelli, Caribbean Amerindian Development Organization and Pan American Indigenous Organization (Barbados)
- United Confederation of Taíno People Indigenous Taíno-Arawak Organization (Puerto Rico)

^[1] Workshop Background Document, *Assessment of the Feasibility of Phasing Out Dental Amalgam* (2020) (emphasis added).

^[2] AMAP/UNEP, *Technical Report for the Global Mercury Assessment* (2013), <http://www.amap.no/documents/doc/technical-background-report-for-the-global-mercury-assessment-2013/848>, p.103

CC:

1. Helena Braun, Member of the Cabinet,
2. Florian Schulze, European Center for Environmental Medicine;
3. Charlie Brown, Secretariat, World Alliance for Mercury-Free Dentistry

Shahriar Hossain, Ph.D.

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Working and allied with:

Secretary-General & Senior Technical Advisor ESDO, Bangladesh <https://esdo.org>

Steering Committee Member, IPEN, www.ipen.org

Executive Vice President, World Alliance for Mercury-Free

Dentistry, <https://mercuryfreedentistry.net>

Board of Director of Pacific Basin Consortium <https://pacificbasin.org>