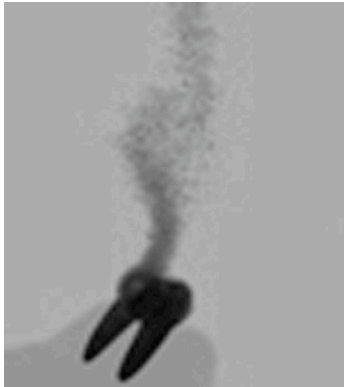


The Suitability of Mercury/ Silver Amalgam Filling Implants
FDA Hearing 6-7th Sept 2006

Mercury/silver fillings are commonly referred to by dentists as silver, silver amalgam or silver alloy fillings. This terminology is deceptive to the public. A recent Zogby poll found that 75% of the public did not realize that mercury was the principle component of these fillings¹.

Silver amalgam is not an alloy but more correctly characterized as a solid solution. *"It is a fallacy that mercury is neutralized when it is combined with other components of silver amalgam. The laws of physical chemistry are followed. Mercury is diluted by the other components of amalgam in what may be considered a solid solution. Although the vapor pressure of mercury is reduced, mercury is still given off. An identical situation arises when alcohol is diluted by water."*² When heated the alcohol readily vaporizes from the water much like mercury readily vaporizes from a mercury/silver filling.



The vapor pressure of mercury doubles with each ten degrees Fahrenheit increase in temperature. Starbucks's coffee for example is served a 140 degrees F. An amalgam filling heated to this temperature would have a vapor pressure 4 fold greater than at body temperature. This is graphically demonstrated by the increase in visible mercury vapor seen at only a 110 degree F temperature as shown in the video demonstration *Smoking Teeth Figure 1*. *Smoking Teeth* DVD's have been provided along with additional documentation by the International Academy of Oral Medicine and Toxicology for each member of this committee.

Figure 1.

Professor James Masi, a metallurgist has demonstrated why mercury vapor can be seen and measured coming from mercury/silver fillings and moreover why the amount increases with chewing³. In Figure 2 below Dr. Masi has touched the surface with a round flat probe with one pound per square inch of pressure and then photographed the result with a scanning electron microscope. Note the circular areas of shiny mercury droplets. The probe has easily brought liquid mercury to the surface of the 25 year-old "set" amalgam filling.

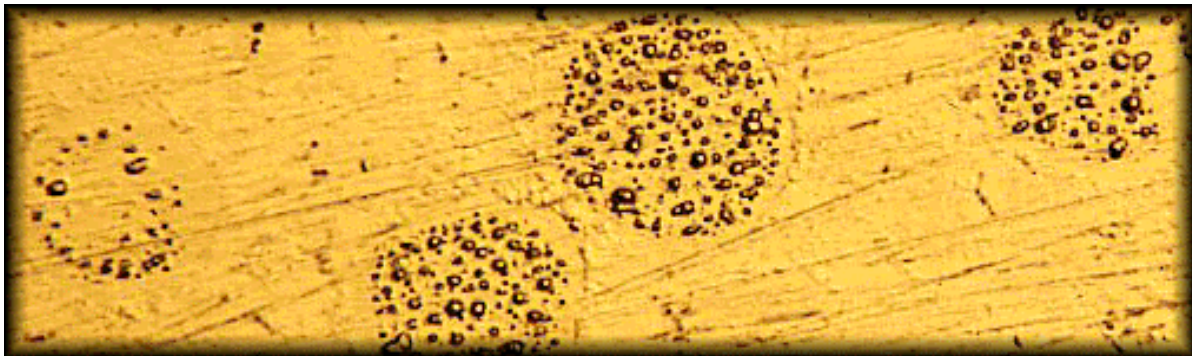


Figure 2.

Autopsies of humans using both neutron activation analysis^{4 5 6} and atomic absorption⁷ have firmly established that implanted mercury/silver fillings are by far the predominant source of human exposure to mercury. Further research has confirmed that there is substantial maternal fetal transfer of mercury from amalgam⁸ and in situ mercury/silver fillings in the birth mother's mouth are the predominant source of fetal exposure to mercury⁹. There are vulnerable subsets of

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the population apparently lacks the ability to effectively excrete this mercury leading to a build up of mercury and early onset of neurological impairments^{10 11}. An additional subset forms abnormal neurotoxic porphyrins¹². None of these populations are normally identified prior to implanting of mercury/silver fillings. Treatment with mercury/silver fillings is common during pregnancy despite the manufacturers long standing recommendations against such practices¹³.

Dental work involving amalgam including routine cleanings results in a large bolus dose of elemental mercury that is slowly excreted in healthy individuals over the next 1 to 18 years^{14 15}
^{16 17}.

Advocates for the continued use of mercury/silver implants are fond of declaring that the mercury in a silver filling has never been proven to have harmed anyone¹⁸. This is the equivalent of declaring that the bullet in the gun never harmed anyone. We are not concerned about the mercury in the filling but rather the mercury that continuously exits the filling and accumulates in distant organs or the fetus^{19 20}.

They have also claimed that these kinds of fillings are safe and cost effective. *Using national blood mercury prevalence data from the Centers for Disease Control and Prevention, we found that between 316,588 and 637,233 children each year have cord blood mercury levels > 5.8 µg/L, a level associated with loss of IQ²¹*. That means that 8 to 16% of the newborns had levels of mercury in the umbilical cord blood sufficient to cause neurological impairment. Although we believe the authors incorrectly identified the source of the mercury to potentially be from fish they estimated the lost productivity to be \$8.7 billion annually (range, \$2.2–43.8 billion). That makes the neurological harm from mercury alone greater than the annual cost of all amalgam fillings.

Further research needs to be done on this matter but with the present state of knowledge it is clear that the implanting of mercury in the bodies of humans without regard to their genetic makeup, physical health, pregnancy status, dental personnel protection or accurate informed consent should cease immediately. It is the responsibility of the amalgam manufacturers to produce the alleged voluminous evidence of safety. Once the amount of mercury exposure has been quantified both for the patient and the dental personnel an appropriate risk assessment can be conducted in this country as it has been previously in others.

Respectfully submitted to the FDA Neurological and Dental Panels by:
David Kennedy, D.D.S. Past President
For the International Academy of Oral Medicine and Toxicology

REFERENCES

¹ <http://www.toxicteeth.org/zogby-poll-ct.pdf>

² Dun, A Harmful Vapors in the Office A report of the findings of the 1985 ODA/RCDS survey of mercury vapor in dental offices in Ontario, Ontario Dentist p 37-38 April 1988

³ Masi, J. V. Corrosion of amalgams in restorative materials: the problem and the promise. In Status Quo and Perspectives of Amalgam and other Dental Materials International Symposium Proceedings (Friberg, L., Schrauzer, G. N., eds) Thieme-Verlag, Stuttgart ISBN 3-13-102471-2 1994

⁴ Schiele R, et al: Studies on the mercury content in brain and kidney related to number and condition of amalgam fillings. Institution of Occupational and Social Medicine, University of Erlangen, Nurnberg, West Germany.

The Suitability of Mercury/ Silver Amalgam Filling Implants
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Presented at the "Amalgam - Viewpoints From Medicine and Dental Medicine Symposium" March 12, 1984, Cologne (Koln), West Germany. Submitted for publication.

⁵ Eggleston DW, Nylander M, Suffin SC, Martinoff JT, Rieders, MF. Correlation of dental amalgam with mercury in brain tissue. *J Pros Dent* 58:704-7, 1987

⁶ Nylander, M., et al. Mercury Concentration in the Human Brain and Kidneys in Relation to Exposure from Dental Amalgam Fillings. *Swedish Dental Journal*; 11:179-187 1987

⁷ Guzzi, G et al Dental Amalgam and Mercury Levels in Autopsy Tissues: Food for Thought. *The American Journal of Forensic Medicine and Pathology* • Volume 27, Number 1, March 2006

⁸ Vimy, MJ; Takahashi, Y; Lorscheider, FL Maternal-fetal distribution of mercury (203 Hg) released from dental amalgam fillings the American Physiology Society 0363-6119/90 R939-945

⁹ Haley, Amy S. Holmes, Mark F. Blaxill, Boyd E. Haley Reduced Levels of Mercury in First Baby Haircut of Autistic Children, *International Journal of Toxicology* 22:277-285, 2003

¹⁰ Godfrey ME, Wojcik DP and Krone CA. Apolipoprotein E genotyping as a potential biomarker for mercury neurotoxicity. *J.Alz.Disease* 2003;5:189-195

¹¹ Mutter J, Naumann J, Schneider R, Walach H, Haley B. Mercury and autism: accelerating evidence? *Neuro Endocrinol Letters*. Vol. 26 #5 pp. 39-46 Oct. 2005

¹² Esceverria, D. Woods, JS, et al. The association between a genetic polymorphism of coproporphyrinogen oxidase, dental mercury exposure and neurobehavioral response in humans. *Neurotoxicol. Teratol.* 2005 Dec 8

¹³ Caulk Densply MATERIAL SAFETY DATA SHEET for Dispersalloy 9/20/95

¹⁴ Reinhardt JW, Boyer DB, Gay DD, Cox R, Frank CW Svare CW: Mercury vapor expired after restorative treatment: preliminary study. *J Dent Res* 58(10):2005, 1979.

¹⁵ Reinhardt JW, Boyer DB, Svare CW, Frank CW, Cox, RD, Gay DD: Exhaled mercury following removal and insertion of amalgam restorations. *J Prosth Dent* 49:652-6, 1983

¹⁶ Molin, Margareta Mercury Released from Dental Amalgam in Man *Swedish Dental J. Suppl.* 71 1990

¹⁷ Mutter J, Daschner F, et al, Amalgam risk assessment with coverage of references up to 2005], *Gesundheitswesen*. 2005 Mar;67(3):204-16. [Article in German](Medline)

¹⁸ Jendresen MD: Mercury in dental amalgam: is it safe? *J Calif. Dent Assoc* 10:31-2, 1982

¹⁹ Svare CW, Peterson LC, Reinhardt JW, Boyer DB, Frank CW, Gay DD, Cox RD: The effect of Dental Amalgams on mercury levels in expired air. *J Dent Res.* 60:1668-71, 1981

²⁰ Abraham JE, Svare CW, Frank CW: The effect of dental amalgam restorations on blood mercury levels. *J Dent Res* 63:71-3, 1984

²¹ Leonardo Trasande, Philip J. Landrigan, and Clyde Schechter Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain Vol. 113 #5 May 2005 *Environmental Health Perspectives*