

5 October 2022

Maja Doma
Executive Officer, Dental
Dental Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
Melbourne, Victoria 3001

By email: maja.doma@ahpra.gov.au

Dear Ms Doma,

Thank you for offering the Australian Dental Association (ADA) the chance to comment on the Dental Board of Australia's (the Board's) statement: *Dental practitioners and students and the Minamata Convention on Mercury* (the draft position statement).

We note that at the fourth Conference of the Parties, held in Bali, Indonesia in March 2022 (COP4), new phase-down actions for dental amalgam were agreed, in addition to existing requirements under Annex A, Part II of the Minamata Convention on Mercury (the Convention).

The additional phase-down actions for dental amalgam state that Parties must:

- exclude or not allow, by taking measures as appropriate, the use of mercury in bulk form by dental practitioners; and
- 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.

The ADA continues to support the existing requirements under Annex A, Part II of the Convention. We also support the additional phase-down actions agreed for dental amalgam at COP4.

In refining the draft position statement, we ask the Board be mindful of the ADA's overarching position: that dental amalgam should continue to be available for use as a dental restorative material, and that dental clinics should practice good mercury hygiene.

We would be most happy to discuss the comments provided herein. Should you have any questions, please do not hesitate to contact Mr Damian Mitsch, ADA Chief Executive Officer, on 02 8815 3333.

Yours sincerely,



Dr R Mark Hutton
President