



Royal College of
Dental Surgeons of Ontario

Ensuring Continued Trust

BULLETIN

TO: RCDSO MEMBERS - DISTRICTS 9, 10, 11 & 12

September 20, 2001

City of Toronto - Pollution Prevention Plan

The College has attempted to work constructively on issues concerning amalgam waste disposal with the City of Toronto, and with the provincial and federal environment ministries.

We have made personal and written submissions to the Works Committee of the City of Toronto, and we are troubled that the City has totally ignored our recommendations. We are concerned that the pollution prevention plan for dental offices exceeds the scope of the sewer use by-law, infringes on the practice of dentistry, and that the plan and the accompanying brochure are misleading and, in some cases, incorrect.

As I stated in my verbal presentation to the Works Committee, our view is that dentists are responsible and caring citizens, and have used dental amalgam for over 150 years to restore and rehabilitate the mouths of millions of people in Canada and the world. Without this effort, many, if not most of us, would be dentally handicapped, affecting our general health and well-being.

The use of dental amalgam to restore oral function has been a highly important and successful public health measure. If, in the course of providing this necessary and cost-effective health-care service, some amalgam has escaped into the environment, then we will take corrective action.

We do not believe that the amounts reported by the Ontario Dental Association (ODA) and in the City's sewer use brochure are accurate; in fact, we believe that they are indeed overestimated. The City of Toronto pamphlet paints a picture of dentists as irresponsible and contributors to Minamata Disease. This is totally absurd, as the next case of Minamata Disease reported in this jurisdiction will certainly be the first.

RCDSO is funding a research grant to the University of Toronto to commission a comprehensive study to address the issues that have led to the concern about dental amalgam waste disposal. Dr. Philip Watson, professor and head of the biomaterials department in the Faculty of Dentistry will lead the research. At the College's invitation, the Ontario Ministry of Environment has assigned a liaison person to the study.

We know that dental amalgam is very stable in the mouth, and it could be that it is equally stable in the environment. The speculation that dental amalgam may be unstable in the environment is probably the leading issue of concern. The City felt that it could not wait for the results of the study and invoked the "precautionary principle" and the by-law was passed. I believe that much of the basis for going forward was anecdotal and unsupported by science.

In addressing the brochure and the Pollution Prevention Plan, the following are of concern:

The sewer use by-law does NOT require the installation of amalgam waste filters unless the mercury concentration in the dental wastewater exceeds the limit of .01 mg. of Hg. per litre. (When the City checked the Hg. concentration in wastewater from the University of Toronto Dental School, it was found to be 10 fold below the limit.)

It is not explained that a dental facility could comply with the by-law if it had the wastewater tested and it is determined to be below the maximum permitted concentration for mercury i.e. .01 mg/L.

Dentists should NOT encourage patients to consider alternatives to amalgam when this may not be in the best interest of the patient, and it is not the City's jurisdiction to make such recommendations.

It is inappropriate for the City to instruct dentists to display posters in offices promoting alternatives to dental amalgam. The plan unnecessarily infringes on the practice of dentistry and a dentist's ability to provide informed consent to patients.

The plan far exceeds the scope of the sewer use by-law. Only 8 of the 47 listed protocols on the last page of the reporting document pertain to the by-law. This document was prepared with reference to the ODA produced "Best Practices for Managing Dental Wastes" booklet which was developed without consultation with the RCDSO, even though much of it pertains to regulatory matters.

RCDSO will attempt to continue discourse with the City to resolve the matters in dispute, but the train is out of the station and it will be more difficult now to redirect it.

We have, however, had good success in dialogue with the federal and provincial environment ministries. As of Friday, September 14, we were able to rewrite the Canada Wide Standard for amalgam waste disposal to reflect our concerns. As soon as all the parties approve the new document, the College will circulate it to all members.

If members have concerns, they may certainly contact either Martin Shaw, Senior Engineer with the City of Toronto Works and Energy Services at 416-392-9932; or the College and speak with Dr. Robert Carroll, Manager, Professional Practice at 416-934-5611 or Dr. Lesia Waschuk, Practice Advisor at 416-961-6555, ext. 3348. The College's toll free number is 1-800-565-4591. Both the ODA and the RCDSO have a list of firms that will test your sewer water for mercury concentration.

We are looking forward to the results of Dr. Philip Watson's study for future direction in dealing with the issue scientifically and effectively.



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