



14-16 Chandos Street, St Leonards, NSW, 2065, Australia

PO Box 520, St Leonards, 1590

Tel 02 8815 3333 | [contact@ada.org.au](mailto:contact@ada.org.au) | ARBN 131 755 989 | ABN 95 174 118 424

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The Chair  
Joint Standing Committee on Treaties  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Via email: [jsct@aph.gov.au](mailto:jsct@aph.gov.au)

To the Joint Standing Committee on Treaties

Thank you for the opportunity for the Australian Dental Association (ADA) to provide a submission on the Minamata Convention on Mercury (the Convention) ratification package to the Joint Standing Committee on Treaties, ATNIA reference: [2021] ATNIA 3; ATNIF reference: [2021] ATNIF 4.

The ADA is the peak body representing dentistry in Australia. It has over 16,000 members working across public and private sectors operating in more than 7,500 small businesses across Australia.

The ADA supports ratification of the Minamata Convention on Mercury as it continues to provide conditions which allow for a gradual phase-down of mercury in dentistry.

The ADA recognises the serious dangers to health and the environment of anthropogenic emissions of mercury and mercury compounds and has previously provided submissions to the Australian Government consultations on the Convention. It is important to keep in perspective that the emissions from mercury in dentistry, however, are a small part of the overall Australian emissions, that the use of mercury in dentistry is seeing a declining trend and that the risk of emissions in the dental sector is highly controlled.

The dental sector uses many dental products that have a risk attached to them and manages these through clear protocols and practises. The risk of emissions from mercury in dentistry is highly controlled as mercury is a small part only of amalgam which is an alloy with other metals. The ADA policy is that only precapsulated amalgam is used in accordance with international standard *ISO 24234:2015 Dentistry - Dental Amalgam*. Waste products from its use are managed with equipment specifically for that purpose (amalgam separators) and there is an organised waste management process, notably through the Ecocycle organisation.

During the period since Australia signed the Convention, there has been a voluntary alignment to *Annex A, Part II: Products subject to Article 4, paragraph 3* which outlines the requirements of the convention in relation to the use of amalgam. As noted in the National Interest Analysis (NIA) and the Final Regulatory Impact Statement (RIS) dated 20 December 2020, dentistry in Australia already exceeds the requirements of the *Minamata Convention* as stipulated in this annex. Many of these requirements relate to the promotion of oral health as a preventive measure which reduces the need for restorations. The ADA's vision, "*to have the best dentists in the world in a nation with the best oral health*" is therefore aligned the intent of these provisions and also with the current *Australian National Oral Health Plan 2015-2024*.

The ADA supports a coordinated and global approach to the management and control of the negative effects of the anthropogenic emissions from mercury and mercury compounds through these provisions and already advocates for oral health promotion in various areas and actively supports this goal in partnership programs. In addition, ADA policy statements *6.11 Dental Amalgam Waste Management* and *6.18 Safety of Dental Amalgam* are publicly available on the [ADA website](#) and thereby make guidance available to all dentists.

The RIS suggests that there would be a \$0 cost to dentistry in meeting the goals of the Convention. While this may be true for the dental sector at the macro level, the cost of purchasing equipment would be an impost on many small businesses which make up the majority of the sector and the ADA would welcome subsidies and/or tax write-offs to support these business decisions.

Do not hesitate to get in touch with our CEO, Mr Damian Mitsch if you would like to discuss this matter further on 02 8815 3313 or by email to [ceo@ada.org.au](mailto:ceo@ada.org.au).

Yours sincerely

A solid black rectangular box used to redact the signature of Dr. R. Mark Hutton.

Dr R. Mark Hutton  
Federal President