

HOLISTIC DENTAL ASSOCIATION

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September 14, 2002

Food & Drug Administration
Dockets Management Branch
5630 Fishers Lane, Room 1061-HFA-305
Rockville, MD 20852

Dear Sirs:

This letter is in response to:

Docket # 01N-0067 – AGAINST the FDA Rule on Mercury Dental Fillings

The Holistic Dental Association, founded in 1978, is a national organization of dental healthcare professionals whose members believe that the accepted concepts in modern dentistry are, unfortunately, limited in scope, do not recognize the physiologic effects, and unintentionally cause harm to a significant number of individuals. Virtually all HDA members do NOT place mercury (amalgam) fillings in their patient's mouths because of this potential risk.

It is difficult to understand how intelligent and educated healthcare professionals can ignore the large amount of existing science and clinical observations that cast doubt on the safety of mercury in amalgam fillings. Dentistry has alternatives to mercury fillings, and every dentist knows about them. And even though there is controversy about the use of mercury fillings, shouldn't the public be adequately and objectively informed and given the option of choosing what materials are used to restore their teeth? Most patients are uninformed about the materials used and the benefits/risks of each. The American Dental Association, to its credit, very recently produced an informational brochure about dental materials, but it is inadequate because it doesn't address the potential problems of toxicity and oral galvanism.

I am sure others have informed the FDA about the health issues of mercury, but I would like to reiterate some basic, but key facts:

1. There is overwhelming scientific evidence to support that mercury is a toxin. It is regulated as such, the exception being when used as a dental restorative material. It is classified as hazardous before placement in the mouth and after its removal from the mouth, but not while in the mouth. Where is the logic in this?
2. It is a proven fact that mercury is not chemically bound in amalgam fillings as was believed in the recent past, and therefore mercury vapor is constantly released into the mouth.
3. There is scientific research indicating a possible link between mercury and chronic illness.
4. Children and fetuses are highly susceptible to mercury toxicity.

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Some references that support these statements:

Web site: www.dams.cc

Web site: www.amalgam.org

Web site: www.icnr.com/uam/MercuryCourse.html

Web site: www.vimy-dentistry.com

Web site: www.cfsn.com/dental.html

Web site: www.fplc.edu/risk/vol2/spring/royal.htm

Web site: vest.ab.gu.se/~bosse/Mercury/Mouth/Mail/gammalcontra.html

Web site: www.listserv.gmd.de/archives/amalgam.html

Book: *The Mercury in Your Mouth: The Truth About "Silver" Dental Fillings*
by Quicksilver Associates

Book: *Toxic Metal Syndrome* by Drs. H. Richard Casdorff & Morton Walker

Book: *It's All in Your Head* by Hal Huggins, DDS

Book: *Mercury Free* by James E. Hardy

Book: *Solving the Puzzle of Mystery Syndromes* by Mary Davis

Book: *Amalgam Illness: Diagnosis and Treatment* by Andrew Cutler

Book: *150 Years of Amalgam* by Fredrik Berglund, M.D., Ph.D.

Book: *Book: ABC's of Mercury Poisoning from Dental Amalgam Fillings Handbook for Victims of Mercury Poisoning* by Mats Hanson, Ph.D.

Book: *Chronic Fatigue – Poisoned by the Mercury in Your Mouth?* by Annika and John McClintock and Christer Malmström DDS

Book: *Does Mercury From Dental Amalgams Influence Systemic Health?* by Gary A. Strong, D.D.S.

Book: *Infertility & Birth Defects - Is Mercury From Silver Dental Fillings A Hidden Cause?* by Sam Ziff and Dr. Michael F. Ziff.

Book: *Mercury Poisoning from Dental Amalgam - A Hazard to Human Brain* by Patrick Störtebecker, M.D., Ph.D.

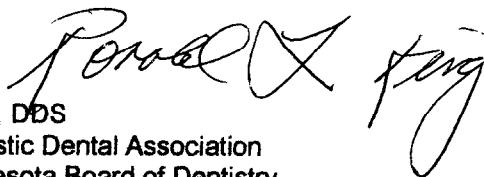
Book: *Silver Dental Fillings - The Toxic Time Bomb* by Sam Ziff

Book: *The Missing Link? – A Persuasive New Look at Heart Disease as it Relates to Mercury* by Michael F. Ziff, D.D.S. and Sam Ziff.

Please realize this letter represents about 160 dentists and their staffs who deal with these problems firsthand, almost everyday. For us, it is not just an academic discussion or a debate of scientific research, it is up close and personal! I think it is accurate to say that those dentists, staffs, professional dental organizations, and educational institutions who argue the opposite point of view, or are silent on the issue, have little experience treating this type of patient and/or have not *personally* read the literature referenced.

The FDA takes great care in not approving products that pose a potential risk to the health of its citizens. All we ask is that you use the same objectivity and due diligence when deciding this issue.

Sincerely,



Ronald L. King, DDS
President, Holistic Dental Association
Member, Minnesota Board of Dentistry