

From: Florian Schulze
Sent: Wednesday, July 17, 2024 3:37 PM
To: DSC
Subject: Re: Financial Impact of Phasing Out Dental Amalgam in Northern Ireland

Dear Mr. McGuigan, dear Committee,

Re: Financial Impact of Phasing Out Dental Amalgam in Northern Ireland

Exploiting the necessary transition to mercury-free dentistry as a pretext for a money grab, the British Dental Association provides data based on the potential loss in private earnings, *which is more theoretical than actual*. The British Dental Association disregards the possibility to use time-saving, affordable and effective alternatives for the NHS while more advanced multi-layer composites with greater aesthetics such as colour matching and translucency may continue to be offered via private arrangement.

There are reimbursement models in other countries in which the public health system replaces amalgam with alternative materials such as bulk-fill composites, compomers and glass-ionomers and the price difference compared to amalgam only ranges between 30 % (in Poland) and 70 % (in Estonia). (see Annexes I-III)

In the Republic of Ireland, transitioning rapidly to mercury-free dentistry, the price difference between amalgam and composite is just 20% (twenty percent). Since May 2022, the option of restoring posterior teeth with either amalgam or composite is available to patients and the difference in the reimbursement for dentists is just €15 (A3A/Amalgam €65 vs. A3C/Composite €80). (see Annex IV)

The British Dental Association wants the DoH to budget in huge sums, on top of the 30 % just granted, money that will be missing for underfunded hospitals and doctors. Further more the BDA's calculation again omits that the NHS only covers 20% of the total spend on dental treatments, but all patients should be given access to affordable mercury-free fillings.

We would still be interested in learning the figures used by the Department of Health to come up to £3.6m. Do they expect a higher demand for standard restorative treatments with an alternative material or do they calculate with significant higher reimbursement fees like the ones charged privately by dentists for composite?

With the new data the expenses for dental amalgam was £650.000 in 2023/24 (see Annex V) and assuming that the current fee for composite in children is introduced for adults, the additional NHS cost would be less than £1m per year, bearing in mind that the fees were just lifted by 30%. (See Annex VI, calculated with the number of reimbursements for dental amalgam in 2023/24)

When considering the Phase out of dental amalgam the health and environmental risks should be taken into account.

Amalgam, 50% mercury, will soon be banned in Europe and in the South for very good reasons. The pro-mercury British Dental Association asks that you ignore all three of these egregious dimensions:

- Ignore the environment, because dental mercury poisons the fish that children eat and causes brain damage in some of those children – the problem is not solved by separators

because the mercury is implanted in people, and eventually all of it goes into the environment;

- Ignore consumer choice, because no one wants a mercury implant—consumers and parents only accept it if they have no choice, or are fooled by the deceptive term “silver fillings”;
- Ignore the safety of dental workers, because mercury is the most volatile of the heavy metals and the ministry should factor in the toxicity of amalgam-based dental offices.

Yours sincerely,

Florian Schulze

Administrative Vice President of the World Alliance for Mercury-Free Dentistry

Managing Director of the European Network for Environmental Medicine

Cc:

Dr. Graeme Munro-Hall, UK, Chief Dental Officer of the World Alliance for Mercury-Free Dentistry

Charles Gailey Brown, President of the World Alliance for Mercury-Free Dentistry

Annex V

| 2023/24 | Number Amalgam Fillings | NHS fees for Amalgam | Total spend | NHS reimbursement 20% | NHS Cost |
|--|-------------------------------|----------------------------|-------------------|-----------------------------|---------------------|
| 1 surface | 32.688 | £10.62 | £347.147 | £2,12 | £69.299 |
| 2 or more surfaces | 9.905 | £15.79 | £156.400 | £3,16 | £31.300 |
| 2 or more surfaces m- occlusal or d- occlusal involved | 98.463 | £20.83 | £2.050.984 | £4,17 | £410.590 |
| 3 or more surfaces m- occlusal or d- occlusal involved | 25.559 | £27.33 | £698.527 | £5,47 | £139.808 |
| Total | 166.615 | | £3.252.058 | | £650.997 |

Annex VI

| 2025? | Number Amalgam Fillings 23/24 | Composite fees for Children under 15 (as of July 24) replacing Amalgam | Total spend | NHS Cost 20% |
|---|--|--|-------------------|-----------------------------|
| 1 surface | 32.688 | £30.21 | £987.504 | £197.500 |
| 2 or more surfaces | 9.905 | £40.65 | £402.638 | £80.528 |
| 2 or more surfaces, m- occlusal or d- occlusal involved | 98.463 | £52.20 | £5.139.769 | £1.027.954 |
| 3 or more surfaces, m- occlusal or d- occlusal involved | 25.559 | £66.96 | £1.711.431 | £342.286 |
| Total | 166.615 | | £8.241.342 | £1.648.268 |



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ANNEX I

Reimbursement of Dental Fillings in Poland after Phasing out Dental Amalgam

100% of Public Reimbursement

Since 20 October 2022 Reimbursement of:

- Glass ionomer cements,
- high density glass ionomer cements and
- resin-reinforced glass ionomer cements.

<https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220001912/O/D20221912.pdf>

Since 5 April 2023 new Reimbursement Fees in Points:

- Total preparation and restoration of a tooth cavity on 1 surface: was 38, is 45.
- Complete preparation and restoration of a tooth cavity on 2 surfaces: was 43, is 54.
- Complete preparation and restoration of an extensive cavity on 2 surfaces: was 50, is 71.
- Complete preparation and restoration of an extensive cavity on 3 surfaces: was 61, is 74.

<https://pliki.infodent24.pl/i/13/09/92/130992.pdf>

Increase of Point Values

The price for 1 point in the years 2017-2021 was invariably PLN 1, in 2022 it was raised to PLN 1.22 and in 2023 to PLN 1.44. In September 2023 to PLN 1.53.

<http://nfz-warszawa.pl/dla-swiadczeniodawcow/aktualnosci/komunikat-o-ogloszeniu-uzupelniajacych-postepowan-konkursowych-w-rodzaju-leczenie-stomatologiczne,2071.html>

| Size | Amalgam >2022 | GIC <2023 |
|-------------------------|------------------|-------------------------|
| 1 surface | 38 Pt. / 13,64 € | 45 Pt./ 16,18 € (+18%) |
| 2 surfaces | 43 Pt. / 15,25 € | 54 Pt. / 19,18 € (+25%) |
| extensive on 2 surfaces | 50 Pt. / 17,68 € | 71 Pt. / 25,19 € (+42%) |
| extensive on 3 surfaces | 61 Pt. / 21,57 € | 74 Pt. / 26,17 € (+21%) |

ANNEX II

Reimbursement of Dental Fillings in Estonia to Phase out Dental Amalgam

50% Reimbursement with a maximum of 60€ per year

<https://www.tervisekassa.ee/inimesele/hambaravi/taiskasvanute-hambaravi/hambaravihuvis>

Average increase of 70%

| Since 03 April 2024 (Amalgam) | Reimbursement |
|-------------------------------|---------------|
| One surface | 57,81 (+75%) |
| Two surfaces | 70,29 (+68%) |
| Three surfces | 78,43 (+65%) |

<https://www.tervisekassa.ee/esmavajalike-hambaraviteenuste-piirhinnad>

| Before 03 April 2024 (Alternatives) | Reimbursement |
|-------------------------------------|---------------|
| One surface | 32,91 |
| Two surfaces | 41,73 |
| Three surfaces | 47,63 |

https://www.tervisekassa.ee/sites/default/files/2020-12/hinnakiri%202020_3.pdf

ANNEX III

Reimbursement of Dental Fillings in France to Phase Out Dental Amalgam

| 15 Octobre 2023 | Tarif conventionnel | Taux de remboursement | Montant remboursé |
|--|---------------------|-----------------------|-------------------|
| Traitement d'une carie une face | 26,97 € (+60%) | 60 % | 16,18 € |
| Traitement d'une carie deux faces | 45,38 € (+57%) | 60 % | 27,23 € |
| Traitement d'une carie trois faces ou plus | 60,95 € (+49%) | 60 % | 36,57 € |

<https://www.ameli.fr/haute-saone/assure/remboursements/rembourse/soins-protheses-dentaires-optique-audition/consultations-soins-protheses-dentaires/consultations-soins-dentaires>

| Before | Tarif conventionnel | Taux de remboursement | Montant remboursé |
|--|---------------------|-----------------------|-------------------|
| Traitement d'une carie une face | 16,87 € | 70 % | 11,80 € |
| Traitement d'une carie deux faces | 28,92 € | 70 % | 20,24 € |
| Traitement d'une carie trois faces ou plus | 40,97 € | 70 % | 28,67 € |

<https://www.france-assos-sante.org/66-millions-dimpatients/offre-de-soins-et-tarifcation/dentaire-combien-ca-coute/>

ANNEX IV

Reimbursement of Dental Fillings in the Republic of Ireland to Phase Out Dental Amalgam

With effect from 1st May 2022, claims for amalgams and composites can be made on posterior teeth. The HSE will reimburse up to and including two (2) restorations per calendar year (from items A3A or A3C) per eligible person, where the contracting dentist is satisfied as to the clinical necessity.

Additional restorations will only be allowed in approved circumstances.

The contractor must provide as much information as possible to the PDS to assist him/her to grant approval.

A restoration may not be repeated on the same tooth within 5 years unless the clinical necessity for such treatment accompanies the claim. No additional treatment may be claimed in respect of the same tooth on the same occasion.

<https://www.hse.ie/eng/staff/pcrs/contractor-handbooks/pcrs%20handbook%20for%20dentists.pdf>

A3A/A3C Restorations: The HSE now facilitates the introduction of composite restorations in the treatment of posterior teeth and will continue to reimburse up to and including two (2) restorations per calendar year (from Items A3A or A3C) per eligible person, where the contracting dentist is satisfied as to the clinical necessity. Additional restorations will only be allowed in approved circumstances. **A3A treatment fee of €65.00 and A3C treatment fee of €80.00 are effective from 1 st May 2022**

<https://www.hse.ie/eng/staff/pcrs/circulars/dental/dental-circular-13-2022-dtss-changes-1-may-2022.pdf>