

Από: ΔΝΣΗ ΔΙΕΘΝΩΝ ΣΧΕΣΕΩΝ <intrel@moh.gov.gr>
Αποστολή: Παρασκευή, 18 Μαρτίου 2022 2:23 μμ
Προς: monika.stankiewicz@un.org; eisaku.toda@un.org
Κοινοποίηση: minister@moh.gov.gr; secretary.gen.pfy.sec@moh.gov.gr; pfy@moh.gov.gr; pfy4@moh.gov.gr; secretary.yp@moh.gov.gr; gd1dy@moh.gov.gr; intrel@moh.gov.gr; eoo@otenet.gr
Θέμα: GREECE / Fourth meeting of the Conference of the Parties to the Minamata Convention on Mercury (COP-4) - Bali, Indonesia, 21 Mar 2022 - 25 Mar 2022
Συνημμένα: Minimata Convention.pdf
Σπουδαιότητα: Υψηλή

Dear Sir / Madam,

With regards to the 4th meeting of the Conference of the Parties to the Minamata Convention on Mercury (COP-4), to be held on 21 Mar 2022 - 25 Mar 2022 in Bali, Indonesia, please find attached the opinion of the competent Directorate of the Hellenic Ministry of Health on the issue of the opinion on the with prot. No. 235 Φ45, Amalg./14-2-2022 document of the Hellenic Dental Federation and the position of Greece with the consent of the Minister of Health and the Secretary General of Primary Health Care of the Hellenic Republic, regarding the proposal of Africa to replace Annex A, part II of the Minamata Convention, which will be discussed at the 4th meeting of the Summit of Contracting Parties to the Minamata Mercury Convention (21-25 / 3/2022, Bali, Indonesia).

Please confirm receipt of this email.

Thank you in advance for your cooperation.

Best regards,

Director: Georgios KAFETZIS, BA, MA, MSc, PhD
International Relations Directorate
Hellenic Ministry of Health
17 Aristotelous Str., 104 33, Athens, Greece
Tel.: +30 213 216 1650
Fax: +30 213 216 1909
E-mail: intrel@moh.gov.gr / gkafetzis@moh.gov.gr



Athens, 11-03-2022

**HELLENIC REPUBLIC
MINISTRY OF HEALTH
GENERAL DIRECTORATE OF PRIMARY
HEALTH CARE
DIRECTORATE OF PRIMARY HEALTH CARE
UNIT OF ORAL HEALTH & DENTAL CARE**

Information : M. Tsantidou
Address : 17 Aristotelous Str
P.C. : 104 33, ATHENS
Tel : 2132161333
Email : pfy4@moh.gov.gr

TO:
The Office of the Minister
of Health

NOTE

SUBJECT: Opinion on the with prot. No. 235 Φ45, Amalg./14-2-2022 document of the Hellenic Dental Federation and the position of our country regarding the proposal of Africa to replace Annex A, part II of the Minamata Convention, which will be discussed at the 4th meeting of the Summit of Contracting Parties to the Minamata Mercury Convention (21-25 / 3/2022, Bali, Indonesia).

Rel:

1. The with prot. no. 235 Φ45, Amalg./14-2-2022 document of the Hellenic Dental Federation and the with prot. no. MC/COP4/2021/28 and MC/COP4/2021/27 proposals of the African continent and the European Union respectively
2. the e-mail message of our Service dated 8-3-2022 to the Department of Public Health and Environmental Hygiene and the with prot. no. 14624//11-3-2022 reply
3. the ministerial decision no. Γ1δ / Γ.Π. 50651 / 12-8-2021 "Approval and entry into force of the Action Plan for the gradual abolition of the use of dental amalgams" ANTIPAS "
4. articles 4 and 20 and Annex A Part II of Law 4665/2020 (Government Gazette A' 33)
5. Article 10 (3) of Regulation (EU) 2017/852 of the European Parliament and of the Council of 17 May 2017 on mercury and repealing Regulation (EC) No. 1102/2008.

Following the above document (ref. 1) of the Hellenic Dental Federation we would like to inform you about the following:

A) Mercury is a component of the earth's crust. It is released into the environment through volcanic activity, soil erosion and, most importantly, due to human activity. The largest use of mercury in the European Union is in dental amalgams. Exposure to it can cause serious health problems and is a threat especially to the development of the child in the womb and in the

first years of life. That's why the World Health Organization has included mercury in the top 10 chemicals of major public health concern.

B) Both the United Nations and the European Union have taken action to protect the health of the population from mercury and its compounds. In this context, the Minamata Convention on Mercury has been established, which was ratified by our country with law 4665/2020 (Government Gazette A' 33), and which in Part II of Annex A recommends a list of measures taken by States for the gradual abolition in the use of dental amalgams (p. 655, Government Gazette A' 33), of which the States should receive at least two.

Having regard to the above Law and Regulation (EU) 2017/852 of the European Parliament and of the Council of 17 May 2017 on mercury and repealing Regulation (EC) No. 1102/2008, the Ministry of Health has instituted the Action Plan for the gradual abolition of the use of dental amalgams "ANTIPAS" (ref. 3). The Action Plan focuses on five of the measures in Annex A, Part II of the Minamata Convention, namely:

- (i) setting national targets for the prevention of caries and the promotion of health, thereby minimizing the need for dental restoration;
- (ii) setting national targets for minimizing the use of dental amalgam;
- (iii) encouraging representative professional organizations and dental schools to educate professionals and students in the dental profession on the use of alternative mercury-free dental restorations and to promote best practices
- (iv) restricting the use of dental amalgams exclusively in capsule form;
- (v) promoting the use of best environmental practices in dental facilities to reduce the release of mercury and mercury compounds into water and soil.

C) With the relevant 1 document, the Hellenic Dental Federation has informed about the submission of a proposal by the African Continent under the leadership of the countries Botswana, Burkina Faso, Madagascar for the amendment of Annex A Part II of the Minamata Convention, which will be discussed at the 4th meeting of the Summit of the Contracting Parties to the Minamata Mercury Convention (21-25 /3/2022, Bali, Indonesia). A proposal to amend Annex A, Part II has also been submitted by EU Member States.

The EU proposal aims to further regulate the phase-down approach by adding to Annex A, Part II a series of restrictions on the use of dental amalgam until 2024, which are already mandatory for our country under Article 10 of Regulation (EU) 2017/852.

The African Continent proposal replaces Annex A, Part II, with a phase-out strategy for the marketing and use of amalgam by 2029, omitting references in the current Chapter on tooth decay prevention, health promotion, promoting the use and research of alternative materials, as well as waste management.

D) The Hellenic Dental Federation with the above document asks our country not to support the African proposal, because "a complete and early phasing out of the use of dental amalgam carries the risk of widening inequalities in oral health. The alternative materials currently

available, on the one hand, fail to replace amalgam as a blocking material in 100% of cases and on the other hand are much more expensive, which make them less affordable and could lead to cancellation or delaying dental treatment and ultimately increasing the burden of disease. **"This would also have a detrimental effect on general health and well-being, putting enormous pressure on already strained health systems."**

E) Regarding the content of the EU proposals and the African continent which falls under the responsibilities of the Department of Public Health and Environmental Hygiene of the Ministry of Health, the opinion of the aforementioned Service (ref. 2) is as follows:

"Important components of the great impact that Mercury can have on health is on the one hand its high toxicity and on the other hand the way it behaves and circulates when released into the environment after its use. For this reason, the Unit of Oral Health and Dental Care of the Directorate of Primary Health Care of the Ministry of Health in Greece, considers that the reference to the adoption of good practices for the retention of mercury during dental work and the proper management of all waste that may contain mercury is an integral part of any proposal to amend the contract, provided that the complete abolition of its use is not possible. **In this context, we believe that Greece in the forthcoming 4th meeting of the Summit of the Contracting Parties to the Minamata Mercury Convention (COP4) should support the EU proposal, which contains specific terms for the retention of dental amalgam waste and the technologies used and not the proposal of African countries, which does not include any reference to dental amalgam waste and deletes any previous reference to them. "**

F) Bearing in mind:

- the fact that the European Union's strategy for the phasing out of dental amalgam (Article 10 of the above Regulation), which is proposed by EU countries to amend the Minamata Convention, is a more comprehensive approach to the African proposal because it also concerns the prevention of dental caries, research and promotion of alternative materials and waste management containing dental amalgam
- the fact that the proposal of the countries of the European Union calls for the adoption of measures that are already mandatory in our country (Article 10 par. 1, 2 & 3a of 3 of Regulation (EU) 2017/852) and that based on the above Regulation and of the current Annex II of the Minamata Convention, the Action Plan for the phasing out of the use of "ANTIPAS" dental amalgams has entered into force
- The Hellenic Dental Federation's position on the African continent proposal
- the opinion of the Department of Public Health and Environmental Hygiene of the Ministry of Health in Greece

the Unit of Oral Health and Dental Care of the Directorate of Primary Health Care of the Ministry of Health in Greece is of the opinion that our country should support the proposal of the EU countries and in any case should not support the proposal of the African continent.

We therefore request for your consent, otherwise, please inform us with your instructions.

The Director of the Directorate
of Primary Health Care

Ath. Sotirhou

With the consent of:

1. The Secretary General of Primary Health Care, Mr. M. Themistokleous
2. The Minister of Health, Mr A. Plevris