



YOUR
SMILE.
OUR
VISION.

SDI LIMITED ACN 008 075 581 | ABN 27 008 075 581
HEAD OFFICE 3-15 BRUNSDON STREET, BAYSWATER. PO BOX 314, VICTORIA, 3153 AUSTRALIA.
TOLL FREE 1800 337 003 | TELEPHONE +61 3 8727 7111
FAX +61 3 8727 7222 | info@sdi.com.au | www.sdi.com.au

20th July, 2021

Chair, Mr. Dave Sharma MP
Joint Standing Committee on Treaties
PO Box 6021
Parliament House
Canberra ACT 2600

Re: Minamata Convention on Mercury

Dear Mr. Sharma,

Thank you for the opportunity to contribute to proposed ratification of the Minamata Convention on Mercury. Please consider the following important points from Australia's only amalgam manufacturer.

Who is SDI:

SDI Limited was founded in 1971 as an amalgam manufacturer, although we now manufacture a range of filling materials, tooth whitening products and their accessories. Currently, we believe SDI is the second largest amalgam manufacturer in the world. SDI exports approximately 90% of what is manufactured to over 100 countries on all continents. SDI has been listed on the ASX since 1985. We believe SDI has approximately 95% of the Australian amalgam market.

The benefits of amalgam fillings:

Amalgam fillings are very inexpensive dental fillings for patients from lower socio-economic areas who need their teeth restored instead of being permanently extracted. SDI sells amalgam in countries such as Australia, New Zealand, USA, Canada, UK, most European countries, plus many developing countries all over the world. Amalgam fillings are relatively simple for a dentist to successfully place when compared to other materials. Fewer steps are required to place amalgam fillings, therefore less time and less cost for the patient.

Compared to alternative materials such as composite or glass ionomer fillings, amalgam fillings are very strong (500Mpa for amalgams compared to about 300MPa for composites/250MPa for glass ionomers) and once placed in the patient last on average about 30 years, compared to composites/glass ionomers which only last 5-10 years. Amalgam fillings have been used for over 100 years and are proven worldwide to last.

World Health Organisation is concerned:

".... a phase out of dental amalgam approach is not a one-size fits-all solution for all countries....". Approximately 57 countries stated that they need amalgam. (Source: COP3, Nov.2019). In the past two years, SDI has supplied amalgam to 64 countries, most of which are developing countries.



YOUR
SMILE.
OUR
VISION.

SDI LIMITED ACN 008 075 581 | ABN 27 008 075 581
HEAD OFFICE 3-15 BRUNSDON STREET, BAYSWATER. PO BOX 314, VICTORIA, 3153 AUSTRALIA.
TOLL FREE 1800 337 003 | TELEPHONE +61 3 8727 7111
FAX +61 3 8727 7222 | info@sdi.com.au | www.sdi.com.au

A natural “phase down” is occurring:

Patient demand is declining. [REDACTED]

Amalgam separators capture the waste:

Technology is readily available to capture dental amalgam waste. Amalgam separators are mandatory in all dental practices in Australia and many other countries.

SDI buys mercury from reputable sources:

SDI abides by all protocols to legally purchase mercury. Our team audit monitors critical suppliers including providers of mercury and suppliers in remote locations. We abide by the Basel Convention international treaty on hazardous waste.

We need the ability to continue to import mercury:

Where possible, SDI sources mercury from local Australian suppliers, often recycled mercury, however, currently the volume does not cover full production needs. We must have the ability to get supply from overseas sources to ensure our production does not decline.

Amalgam manufacturing employees Australians:

SDI's employees assist in the manufacture alloy powder, run capsulation machines, pack capsules into boxes, distribute and sell. We are gradually redeploying these employees to other areas, but this will take time.

Investing for alternatives to amalgam fillings:

[REDACTED]

Patient demand is driving the decline of amalgam, this is mainly due to the ugly appearance of amalgam rather than concerns based on use of mercury. Knowing that patient demand is growing for tooth-coloured restorations SDI has been aggressively investing into the research and development of new materials particularly in the past 10 years. SDI employees 13 scientists, several with PhDs, who spend most of their time developing amalgam alternatives. Each year, SDI spends approximately \$3.5M on developing these new materials. Our research laboratory focuses on composite, glass ionomer and other types of filling products and accessories to try to replicate the benefits of amalgam.

We understand our key amalgam competitors, Kerr Dental (USA), Dentsply (USA), Ivoclar Vivadent (Lichtenstein), Ardent (Sweden), Cavex (The Netherlands) and Nordiska (Sweden) are also doing the same. SDI collaborates with several of our competitors with regards to SDI's innovative capsule system and the competitors' new materials. None of these new materials are considered a true alternative to amalgam.



YOUR
SMILE.
OUR
VISION.

SDI LIMITED ACN 008 075 581 | ABN 27 008 075 581
HEAD OFFICE 3-15 BRUNSDON STREET, BAYSWATER. PO BOX 314, VICTORIA, 3153 AUSTRALIA.
TOLL FREE 1800 337 003 | TELEPHONE +61 3 8727 7111
FAX +61 3 8727 7222 | info@sdi.com.au | www.sdi.com.au

SDI was also fortunate to win a \$3m Commonwealth Government Grant through the Cooperative Research Centres Projects program. This project “Dentistry without mercury – glass fibre reinforced flowable dental composite restorative materials” is a collaboration with the universities of NSW, Sydney and Wollongong. We are grateful to have received this, but research needs to continue to ensure Australia can be a leader in dental research.

Are other fillings safe for the environment and patient?

There is not enough research to show that the current amalgam alternatives are safe for the environment. Composite fillings use nanoparticles and resins, which are also under question. At least 75% of non-amalgam fillings placed are composite fillings.

Let the experts choose:

Dentists need to be able to offer their patients alternative filling materials. There is a variety of different factors why a dentist will choose one filling type over the other. The oral environment can be difficult to control and can cause the dental filling to fail. Cost is also a significant factor: amalgam is the lowest cost, long lasting, high-quality filling available. The dentists are the experts in choosing what is right for their patient.

Phase down to 2030 ONLY:

SDI supports a phase down to 2030 in the use of amalgam for dental materials. Until true alternatives can be developed, dentists need amalgam as part of their selection to meet their patients' needs. The phase down is naturally occurring due to patient demand for tooth-coloured fillings. Australia is a global citizen and needs to look after patients from lower socio-economic groups globally.

If you have any questions, please contact me directly.

Yours faithfully,

Samantha Cheetham
CEO