

American
Dental
Association



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May 19, 2003

Dockets Managements Branch
(HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

RE: Response to the Food and Drug Administration's request for interested persons to provide information for a scientific literature review related to the health effects of dental amalgam in humans, 68 Fed. Reg. 25047-25048.

Dear Sir/Madam:

The American Dental Association (ADA or Association) is pleased to provide the Food and Drug Administration (FDA) with the attached bibliography of peer reviewed journal articles published from 1996 to 2002 that address the health effects of dental amalgam in humans. The ADA represents over 147,000 dentists in the United States, or over 70% of all practicing dentists nationwide. The Association seeks to advance the art and science of dentistry, promoting high quality dental care, and the oral health of the American public.

The attached bibliography was compiled by cross searching two standard bibliometric databases, Medline and Toxnet, for articles published during the relevant period. The initial search produced over four hundred studies investigating both the physical and biological properties of dental amalgam. The search parameters were then refined to focus on studies that shed light on the potential "health effects of dental amalgam in humans," in keeping with the scope of the planned review. The results of that search are attached.

Although the Association confined its search to the period requested by the FDA (January 1, 1996 to June 1, 2003), we wish to emphasize the importance of viewing the current literature in the context of the continuum of peer reviewed studies and knowledge that extends back over many years. Numerous peer reviewed studies that continue to stand the test of time were the subject of prior federal agency reviews in 1993 and 1997 and parallel international reviews in 1994 (Sweden), 1995 (Canada), 1996 World Health Organization) and 1997 (Canada and World Health Organization). While we understand and support the focus on current research, it is imperative that articles in the peer-reviewed literature from January 1, 1996 to June 1, 2003 be considered in context. Sound scientific studies should not be excluded solely because they were published before a specified time frame.

The Association's search of the peer-reviewed literature produced articles of varying scientific quality. The inclusion of any given article in this submission should not be taken as an endorsement by the ADA of that article, its methodology or findings. In fact, the Association is

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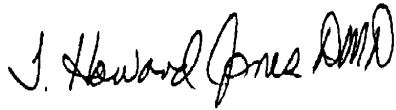
on record as challenging a number of the studies included in our submission on scientific grounds. Although the Association, in the spirit of scientific neutrality, did not screen the results of its search by the quality of the evidence produced, it is critical to the integrity of the planned FDA review that it include appropriate screening criteria.

The Association recommends that the FDA publish the scientific methodology or protocol in order to give the scientific community an opportunity to comment. We would expect the protocol for this kind of review to include the following elements: background, objective(s), inclusion criteria, search strategy, quality assessment criteria, data extraction and analysis.

The notice in the *Federal Register* states that an "independent group will conduct the review," but provides no other information about the qualifications and selection of the reviewers or how the review will be conducted. The Association applauds the FDA's intent to select reviewers who have no potential bias or conflict of interest. However, to exclude individuals solely because they have been involved in prior reviews could unnecessarily deny the agency the expertise of those who are most qualified to contribute. Care must be taken to ensure that the reviewers are sufficiently familiar with dental amalgam and its use in clinical dentistry to understand and interpret the research findings. For this reason, the Association believes that it is important to include qualified dental experts on the review panel.

The ADA appreciates the FDA's consideration of our information and suggestions. Should you have any questions, please contact Jonathan B. McLeod, Manager, Legislative and Regulatory Policy at (202) 789-5176.

Sincerely,



T. Howard Jones, D.M.D.
President



James B. Bramson, D.D.S.
Executive Director

THJ:JBB:JM:chf