To
The World Health Organization
The Legal Counsel
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FDI World Dental Federation.
The FDI World Dental Federation is an NGO in official relations with the WHO, and organizes national dental associations worldwide - almost 1 million dentists.

They however also organize individual dental manufacturing industries and dental trade corporations. A number of dental umbrella organizations in the field of both manufacturing and trade, some world reaching, are also members.

The industrial membership is organized as Supporting Members and Corporate Partners (1, 2). The FDI is heavily dependant on money from these industries. In 2006 Treasurer’s Report it is stated that (3):

“The deficit predicted for 2006 highlights the financial challenges facing the organisation and our continued heavy reliance on Congress and corporate partners’ income.”

In a mid 1990’s leaflet from the FDI, companies are invited to become an FDI Corporate Partner (4). The leaflet says that an increasingly important task for the FDI is to co-ordinate the world's expertise, to produce and disseminate policies and "state-of-the-art" consensus reports. The FDI leaflet states that: "Obviously, the Industry and the FDI have many of these interests, concerns and goals in common."

International Dental Manufacturers, idm, is a supporting member of the FDI (1). They are an umbrella organization for the dental industry world wide. The reason they are collaborating with the FDI and others is revealed in the idm Mission statement (5):

“Mission
To coordinate the joint international interests and benefits of the member regional industry associations; to represent their interests before governments and professional dental organizations, including international dental organizations such as fdi -World Dental Federation, IADR International Association of Dental Research, IFDEA International Federation of Dental Education Associations.”
In the FERNEY communiqué the FDI says that (6):

“On 15 May 2006, the FDI and idm Executive Committees held their annual meeting in Ferney-Voltaire (the headquarters of the FDI is located in Ferney-Voltaire, my comment). The discussions covered a wide variety of matters of mutual interest. The healthy relationship and collaboration between the FDI and idm is strengthened through these regular meetings.”

The WHO Oral Health Program works very closely indeed with the FDI. In fact the FDI has its own representative at the WHO, Prof Poul-Erik Petersen (7). Prof. Petersen is however also head of the WHO Oral Health Program. In other words: He has a top position in both organizations.

It is possible that a similar arrangement was made during earlier years, meaning for example that Dr. Gennady Pakhomov possibly also had a top position in both the WHO and the FDI. Dr. Pakhomov was the WHO officer in charge when the “WHO/FDI Consensus Statement on Dental Amalgam” was issued in 1995 and 1997.

Consensus Statement.
On 25 October 1995 the WHO issued a “WHO/FDI Consensus Statement on Dental Amalgam”. After numerous requests from WHO Member States, organizations and individuals it was decided that a review of the statement was to be made in the form of an expert consultation meeting. This resulted in the report “Dental Amalgam and Direct Restorative Materials” (Ed. Mjör IA, Pakhomov GN) and the subsequent 1997 “WHO/FDI Consensus Statement on Dental Amalgam”. This is a Consensus Statement in perfect accordance with the FDI leaflet that offers the dental industry to become an FDI Corporate Partner (4).

It is clear from the Executive Summary made public by the WHO itself that this meeting was an expert consultation (8). In the Heavy Metal Bulletin Legal Officer Ewa Carlsson Hoppergher from the WHO says (9):

“Expert groups, whatever the form, are usually set up as ad hoc groups, and what they have in common is that they are only set up in order to provide advice to the WHO. This means that any statements or recommendations made by the group or individual experts are not in any way binding for WHO, or for any other body for that matter, they are only made as advice to WHO. Also, WHO is in no way responsible for the advice provided by the experts.”

The title of the statement indicates that this is not only advice given to the WHO, but in fact a statement made by the WHO recommending the continued use of dental amalgam. In a great number of instances the WHO Consensus Statement has been used by dental organizations influencing both national and international health policies. It has been on the FDI site for a number of years (10).
Just recently, in May 2007, it was used by the Council of European Dentists (CED) and forms the main foundation for their amalgam resolution with a very clear reference to the WHO (11):

“The safety and importance of the continued use of amalgam is supported by the World Health Organization (WHO)…”

**Appeal.**

For both ethical reasons and on legal grounds I appeal to the WHO to make a clear public statement to the WHO Member States clarifying the legal status of the so-called “WHO/FDI Consensus Statement on Dental Amalgam.”

It can not be in the interest of neither the WHO nor the public that advice presented in a consultation report is continuously being portrayed as an official WHO statement recommending the continued use of dental amalgam, especially so since it has a profound impact on both national and international health policies.

For reasons of partiality it is essential that this case is not handled by the WHO Oral Health Program.

**References.**

1/ [http://www.fdiworldental.org/federation/5_4support.html](http://www.fdiworldental.org/federation/5_4support.html)
2/ [http://www.fdiworldental.org/congress/5_0corporate.html](http://www.fdiworldental.org/congress/5_0corporate.html)
4/ FDI. An Invitation to World-wide Partnership. See enclosed copy of leaflet.
7/ [http://www.fdiworldental.org/federation/2_3standingcoms.html](http://www.fdiworldental.org/federation/2_3standingcoms.html)
10/ [http://www.fdiworldental.org/federation/assets/statements/ENGLISH/Amalgam/Dental_Amalgam.pdf](http://www.fdiworldental.org/federation/assets/statements/ENGLISH/Amalgam/Dental_Amalgam.pdf)

Sincerely

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