

Appendix H

Consultation Feedback Details for Proposed Dental Office Pollution Prevention (P2) Submission Requirements

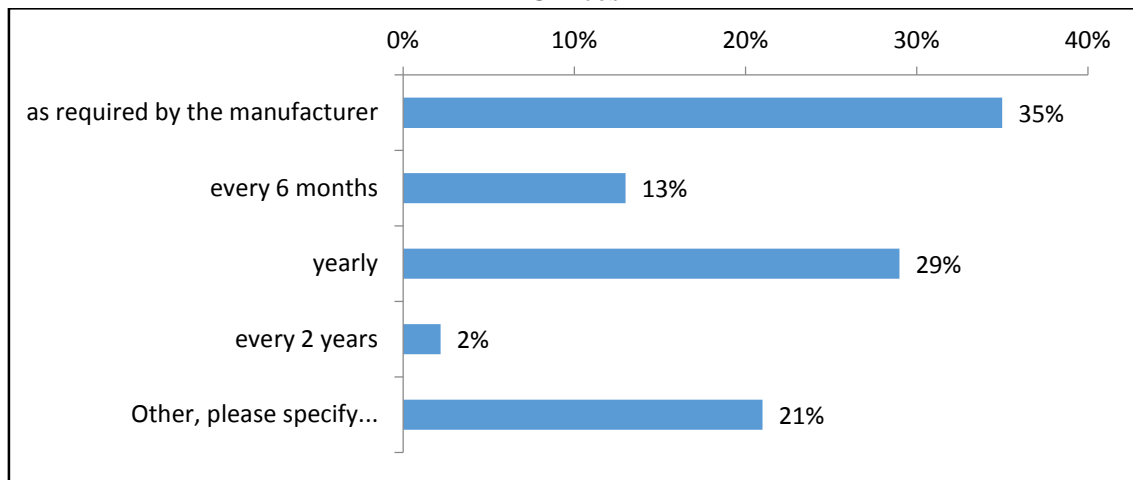
Survey Results

Of the approximately ninety (90) dental offices that responded to the survey, 84% agree with the new reporting requirement being proposed and less than half (42%) clean their amalgam separator within the year (13% every six (6) months and 29% yearly). This latter result, along with the similar comments from the Ontario Dental Association and Royal College of Dental Surgeons of Ontario, prompted Toronto Water to modify the proposal from annual submissions to submissions based on manufacturer's recommended cleaning schedule. Survey comments also revealed that amalgam use has drastically decreased over the years as other alternatives are used (e.g. composite resin fillings, also known as tooth-coloured fillings).

Highlights:

- 5.6% response rate (approximately 90)
- 84% felt one P2 Plan submission would reduce administration
- 71% of respondents keep maintenance invoices on site and 17% keep them off site
- 42% clean their amalgam separator within a year (13% every 6 months and 29% yearly) and 35% clean as required by the manufacturer (see below graph)
- 61% chose email as the preferred communication method and 36% chose regular mail

Figure 1: Responses Regarding Frequency of Amalgam Separator Cleaning Practiced at Dental Offices



Comments:

Reasons for Amalgam Separator Cleaning Frequency Greater than 1 Year

"Usually the company that manages the waste disposal also cleans the separator. They usually do it once or twice a year. However, we do not use Amalgam in our office anymore."

"Only 1 dentist working at anytime, no more than 5 silver / mercury restorations placed per year and the number of amalgam restoration removal has drastically decrease over the years as the population ages."

"Amalgam separator filters should be changed when approaching capacity and not arbitrarily once a year."

Industry Feedback

The Ontario Dental Association and Royal College of Dental Surgeons of Ontario were consulted throughout the P2 consultation process and both support the proposed change in dental office P2 submission requirements. The ODA assisted with developing the survey that was circulated to all dental offices and helped with outreach by sending a reminder to their members. The ODA also assisted in updating the P2 Dental Office form providing numerous edits and voiced their overall satisfaction through a letter of support. Both the Ontario Dental Association and Royal College of Dental Surgeons of Ontario felt that annual proof of maintenance submissions, as originally proposed, was too frequent and the College made Toronto Water aware of the practice of third party maintenance of the amalgam separator creating instances where dental offices would not be able to provide the level of detail being asked.