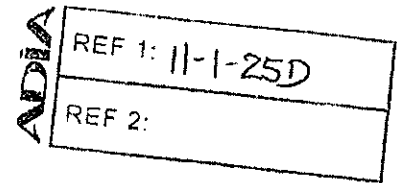


Ref: 11.1.25D — 2 June 2014



Mr Bryan Clark  
Director of Trade & International Affairs  
Australian Chamber of Commerce and Industry  
Level 3 – Commerce House  
24 Brisbane Avenue  
BARTON ACT 2600

Dear Mr ~~Clark~~ <sup>Bryan</sup>

**RE: Tariff Removal – Environmental goods**

Thank you for your correspondence dated 29 April 2014 advising that the Department of Foreign Affairs and Trade (DFAT) is seeking guidance on goods for which it would be appropriate to remove tariffs on environmental grounds. As the peak business organisation representing manufacturers and importers of dental products, the Australian Dental Industry association (ADIA) has consulted with its members and can tender the following advice.

ADIA understands that a five per-cent import tariff is levied on amalgam separators and the details of these are attached. Dental amalgam is a tooth restorative material (the silver fillings commonly used by dentists) of which mercury is a constituent material, typically fifty percent by volume. The amalgam separator is used in many dental practices as a means of collecting the waste amalgam generated in many dental procedures thus allowing the amalgam to be processed with a view to recycling the mercury. Amalgam separators are therefore a vital piece of equipment that makes a significant contribution towards reducing mercury pollution in waterways.

In 10 October 2013 the Australian Government signed the *Minamata Convention on Mercury* and it is expected that this Convention will be ratified during the course of the coming year. This treaty will commit the Australian Government to a qualified goal to controlling and, where possible, reducing emissions of mercury from relevant sources. In this context, amalgam separators are a vital piece of equipment to help achieve this objective thus merits the permanent removal of an import tariff.

If you have any questions or require further information please contact me at your convenience.

Yours faithfully

  
Troy R Williams AFAM MAICD  
Chief Executive Officer



Australian Dental Industry Association Incorporated  
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**TC 1338757 (8421.21.90)**

8421.21.90 SEPARATORS, AMALGAM SEDIMENTARY, DENTAL,  
vacuum suction, having  
ALL of the following:

- (a) amalgam separation NOT less than 70%;
- (b) water flow rate NOT greater than 4.5 L/min;
- (c) air AND water separation

**TC 9607748 (8421.21.90)**

8421.21.90 AMALGAM SEDIMENTARY SEPARATOR, DENTAL,  
vacuum suction, having ALL of the following:

- (a) minimum of 70% amalgam separation;
- (b) maximum water throughput 1.5 L/min;
- (c) air and water separation;
- (d) ability to accept a disposable collection tank