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## **Proposals for amendments to Specified Dental Products Group Standards**

Thank you for your request for comment from the Health and Disability Commissioner (HDC) on the draft proposal for amendments to the Specified Dental Products Group Standards (the standards).

### **Background**

The Dental Council of New Zealand and Ministry of Health have requested amendments to the standards as follows:

- A restriction on the concentration of hydrogen peroxide permitted in dental products, where such products can be obtained from sources other than a dentist (commonly known as over the counter, OTC);
- New identification requirements provided in leaflets for dental products which contain/release hydrogen peroxide.

### **My response**

I commend the proposed amendments as I consider there is a potential risk of harm to consumers through the use of hydrogen peroxide products for tooth whitening in circumstances where there is no adequate supervision by a registered dentist.

#### *Dental products containing or releasing more than 3.6% hydrogen peroxide*

It is proposed that the standard will state that such products can only be obtained by a member of the public “from a dentist”. However I am aware of organisations which operate tooth whitening clinics with the support of a dentist. However, the organisations have no dentist on site at the time the tooth whitening products are supplied and/or applied to the consumer’s teeth.

I **recommend** that the proposed standard is amended to clarify that the sale of such products containing more than 3.6% hydrogen peroxide must be made directly by a dentist or if a person under the supervision of a dentist the oversight by the dentist must be practicable and meaningful.

I consider that products containing or releasing more than should also have a precautionary statement provided by means of a product leaflet.

#### *Implementation date*

In light of a potential risk of harm from these products I **recommend** that the changes be implemented as soon as practically possible.