

**International  
Joint  
Commission**

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June 28, 2000

Dr. Andrew Hamilton  
Commission for Environmental Cooperation  
393, rue St. Jacques Ouest, Bureau 200  
Montreal, QC H2Y 1N9

Dear Dr. Hamilton:

**Subject: Decision Support Document for Lindane, April 19, 2000**

The International Joint Commission has reviewed the proposal for the development of a continent-wide action plan to reduce environmental exposure to lindane. The document characterizes the current state of knowledge about lindane and the shared concern over its impact. The Commission is supportive of such an action plan being prepared and implemented expeditiously.

The Commission has been on record for many years on the pressing need for action to virtually eliminate persistent toxic substances from the environment, particularly in the Great Lakes. The United States and Canadian governments have signed a binational toxics strategy to accomplish such an objective. Both governments have committed to making their best efforts to reduce the use of lindane, a Level H substance in this strategy. The Commission is encouraging greater attention be given to persistent toxic substances which are deposited from the air and the need to look beyond the Great Lakes Basin when designing reduction and elimination strategies.

Lindane is a persistent and toxic substance that has been shown to be subject to long range atmospheric transport and deposition in ecosystems far removed from where it is used. It can bioaccumulate in biota, wildlife and humans, and can have a wide variety of toxicological effects. As with many of these persistent organic pollutants, there is some uncertainty and a lack of consistent data on the effects of lindane. Sufficient information is available, nevertheless, to suggest that the precautionary principle should be applied in order to reduce the risk of adverse effects to environmental and human health. Taking action to reduce lindane use will have environmental and human health benefits. Certainly, in the Great Lakes, clean-up and restoration of beneficial uses of the waters cannot be accomplished without addressing the out-of-basin sources of such contaminants.

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In summary, the Commission supports the recommendation that a North American Regional Action Plan (NARAP) be prepared and implemented for lindane. As an actively used substance in all three countries, coordinated regional action will likely provide the most effective means for moving forward to reduce and eventually eliminate the use of this persistent toxic substance. Pollution prevention initiatives for reducing and eliminating lindane from remaining essential uses and the development of integrated pest management practices that encourage the use of environmentally friendly alternatives to lindane should be included in the NARAP.

Yours sincerely,

Gerry G. Galloway  
Secretary  
U.S. Section

c.c.: Ms. Janine Ferretti, Executive Director, CEC

Murray Clamen  
Secretary  
Canadian Section