

Room 300, Park Plaza
2365 Albert Street
Regina, Saskatchewan
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June 6, 2000

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

RE: Decision Document on Lindane

Dear Dr. Hamilton:

I read through the "Decision Document on Lindane" and have two important comments.

First, lindane was not banned in 1999. Use of existing stocks will continue in western Canada for several years. It would be difficult if not impossible to ban lindane because stocks are scattered in small pesticide dealerships through the prairie provinces. Even if an effective ban could be implemented, disposal would be a huge exercise and costly.

Second, I think the report could benefit from a review of some of the recent publications on lindane from the prairie provinces where most of the Canadian use occurs. These publications include:

1. Donald, D.B. and Syrgiannis, J. 1995. Occurrence of pesticides in prairie lakes in Saskatchewan in relation to drought and salinity. *Journal of Environmental Quality*. 24: 266-270.
2. Donald, D.B., Block, H., and J. Wood. 1997. Role of ground water on hexachlorocyclohexane (lindane) detections in surface water in western Canada. *Environmental Toxicology and Chemistry* 16: 1867-1872.
3. Crosley, R.W., Donald, D.B., and Block, H.O. 1998. Trends and seasonality of a- and g-hexachlorocyclohexane in western Canadian surface waters (1975-94). *Environmental Pollution* 103: 277-285.
4. Donald, D.B. and seven other authors. 1999. Delayed deposition of organochlorine pesticides at a temperate glacier. *Environmental Science and Technology*. 33: 1794-1798.

5. Donald, D.B. and seven other authors. 2000. Response to Comment on "Delayed deposition of organochlorine pesticides in a temperate glacier". Environmental Science and Technology. 34: in press.

I hope you find these references useful.

Cordially,

David B. Donald