

June 19, 2000

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

Dear Dr. Hamilton,

We are writing to submit our comments on the recommendation of CEC's Sound Management of Chemicals' Substance Selection Task Force to develop a North America Regional Action Plan (NARAP) for lindane.

We firmly support the Task Force recommendation that a NARAP be developed for lindane. The fact that this dangerous organochlorine is still used in all three countries in the region-and that use appears to be growing significantly in Mexico-is reason for serious concern and immediate action.

In addition to the NARAP elements recommended by the Task Force (section 4.2 of the decision document), we believe a regional action plan must include the following:

1. Firm goals of ultimate elimination in all three countries, with specific phase out dates and interim reduction targets as necessary. "Controlling releases into the environment" (section 3.2.2) is an ineffectual and inappropriate approach to reducing the health and environmental risks of persistent organic pollutants (POPs) such as lindane. It is well understood that POPs cannot be effectively managed due to their bioaccumulative and transportable nature. Elimination is the most effective way to protect public and environmental health.
2. National public education campaigns in each country. Such campaigns should be established immediately upon adoption of the NARAP and continue until the elimination goal is achieved. National campaigns would serve to raise public awareness about the environmental and health risks of lindane, and would support and accelerate the ultimate elimination goal.
3. More attention to quickly eliminating the public health uses of lindane. Use of lindane to control head lice in the United States remains widespread. While use data is difficult to find, a 1992 estimate put the number of retail lice prescriptions at 2.3 million. Lindane used to control head lice not only puts children at risk from direct exposure, but represents tremendous environmental contamination. The Los Angeles County Sanitation District estimates that a single use of prescription lindane rinsed directly into the sewage system contaminates six million gallons of water. Legislation is currently being considered in California to ban public health uses of lindane.
4. Nonchemical alternatives to lindane should be emphasized. For both agricultural and public health uses, nonchemical alternatives to lindane are well documented. Information and training

on these alternatives – and research on additional measures where needed - should be the focus of the information sharing actions under the NARAP.

5. Monitoring of lindane in the environment. The final recommended element of the NARAP, "Actions designed to determine the success of the NARAP," should include a program of monitoring lindane and its isomers (particularly alpha and beta HCH) in the environment and in human body burdens. While it is true that there are additional, non-North American sources of lindane which contaminate the North American environment, significant reduction or elimination of lindane use in Canada, the U.S. and Mexico should have measurable impact.

6. Continued public education and monitoring of illegal use following elimination. Lindane use will continue in other countries following its elimination in North America, and will thus remain accessible to users in the region. It is therefore important to ensure that the general public is aware that use of this chemical is no longer permitted. In addition, official means of monitoring and discouraging illegal use of lindane should be established.

We appreciate the opportunity to comment on this draft decision document and are hopeful that the Task Force will take the steps needed to lay the groundwork for effective action to eliminate the use of lindane in North America.

Sincerely,

Kristin S. Schafer
Pesticide Action Network North America

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