

I read, with interest the CEC document on lindane and would like to comment briefly on it.

Firstly, the document is at best, confusing, and, at worst, disingenious, in its mixing of information concerning lindane and a- and b-HCH, especially in the arctic where lindane is a relatively minor component of total HCH. It is my understanding that technical HCH contributes the majority of total HCH into the arctic ecosystem and the source of much of this lies outside of North America. Your document has done little to show to what extent a North American ban on lindane will reduce HCH in the arctic. The document should make an effort to distinguish between lindane and technical HCH as sources of HCH in the arctic and should make an effort to estimate the degree to which a North American ban on the former will reduce all HCH compounds in the arctic.

Of equal concern is the failure of this document to indicate the probable 'replacement' seed dressing compounds. The banning of lindane in North America would be extremely beneficial if the replacement compounds are not persistent and of low toxicity. While the former scenario is likely, I fear that the latter is not. All too often, persistent compounds of relatively low acute toxicity have been replaced by non-persistent but very toxic compounds. This may result in sporadic incidents of mass wildlife mortality if animals feed directly on the treated seed. It would be irresponsible to recommend a ban on lindane without recommending suitable alternatives for each labeled use.

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