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September 10, 2004

Mr. Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
By Fax: 202-501-1450

Dr. Lester M. Crawford
Acting Commissioner
U.S. Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857
By Fax: 301-443-3100

Dear Administrator Leavitt and Acting Commissioner Crawford,

As health care providers, we are writing to express our deep concern about the continued reliance on the toxic pesticide lindane in agriculture and for pharmaceutical purposes, and to seek your support for a plan to eliminate lindane use in North America.

Lindane is a persistent, bioaccumulative, organochlorine insecticide that has been banned in 17 countries. The International Agency for Research in Cancer (IARC) and the U.S. EPA have classified lindane as a possible human carcinogen. Lindane is also a potent neurotoxicant. Acute exposures may be followed by nausea, dizziness, muscular weakness, tremors, and seizures, while liver disease and long-term damage to the nervous system may result from chronic exposures. Occupational exposures are associated with blood disorders, headaches, convulsions, and reproductive hormone disruption.

As you know, Administrator Whitman and her counterparts in Mexico and Canada resolved in June 2002 to develop a North American Regional Action Plan for lindane. At present, all three countries continue to allow pharmaceutical lindane use for pediculosis, lice, and scabies treatment, and lindane is used as a seed treatment for agricultural crops in the U.S. and Mexico. A tri-national task force will convene in Montreal this September to draft the action plan.

Continued use of lindane is problematic from a public health perspective. Lindane-containing shampoos contaminate drinking water sources and directly expose young children to this pesticide that can harm their developing brains. Moreover, because lindane is highly persistent and travels globally via air and water, its continued use in agriculture poses an exposure risk to people far from the source. Lindane is now one of the most abundant pesticides in Arctic air and water, and northern indigenous peoples are exposed through their traditional diets. Lindane residues have also been reported in a variety of common foods nationwide.

Given the widespread exposure and potential public health risk posed by lindane, along with the availability of safer, affordable alternatives, we call on you to work with your counterparts toward the rapid elimination of pharmaceutical, veterinary, and agricultural lindane uses in North America.

Thank you for your attention to this important public health issue. Please direct any questions or concerns to Karen Perry at Physicians for Social Responsibility, 202-667-4260 x249, kperry@psr.org.

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