

September 27, 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 organizations working with those with learning and developmental disabilities, we are writing to express our deep concern about the continued reliance on the toxic pesticide lindane in agriculture and for pharmaceutical purposes. We 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. It is also a potent neurotoxicant. Acute exposures may be followed by nausea, dizziness, muscular weakness, tremors and seizures. Chronic exposures, particularly exposures to young children whose nervous systems are still developing, may impact healthy brain development and contribute to learning and development problems. This is of particular concern to us, given the increasing numbers of children with learning and developmental disabilities.

It is also of great concern to us that children can be exposed to lindane in a variety of ways. For example, lindane-containing shampoos are often applied directly to children's scalps in order to kill lice. These shampoos then contaminate drinking water sources. In addition, because lindane continues to be used in agriculture, its residues have been found in a variety of common foods nationwide, putting consumers, especially children, at greater risk.

Given that lindane is a known neurotoxicant and poses grave public health risks, it is common sense to take precautionary action and protect children, as well as those who already have disabilities. You are no doubt aware that a tri-national task force will convene in Montreal September 28th-30th to draft a North America Regional Action Plan for lindane. At present, all three countries continue to allow pharmaceutical lindane use for lice and scabies treatment, and

lindane is used as a seed treatment for agricultural crops in the U.S. and Mexico. This is not acceptable given the known health implications and the availability of safer, affordable alternatives.

The U.S. needs to take a leadership role to protect our children from exposure to this potent neurotoxicant. We call on you to address this important public health issue by working with your counterparts in the other countries toward the rapid elimination of pharmaceutical, veterinary, and agricultural lindane use throughout North America.

Sincerely,

Elise Miller, M.Ed.
Executive Director,
Institute for Children's Environmental Health
National Coordinator,
The Learning and Developmental Disabilities Initiative

Additional signatories:

American Association on Mental Retardation
California Communities Against Toxics
Clean Water Action, California
Healthy Children Organizing Project
Healthy Schools Network, Inc.
Learning Disabilities Association of America
Learning Disabilities Association of California
Learning Disabilities Association of Maine
Marin Golden Gate Learning Disabilities Association
Pesticide Action Network of North America
Rose Foundation for Communities and the Environment
Saratoga Foundation for Women WorldWide, Inc.
Science and Environmental Health Network
The Arc of the United States