PHILIP MORRIS

U.S.A.

PRESS BRIEFING
by STEVEN C. PARRISH
AND
THOMAS J. BORELLI, PhD.
ON
EPA'S DRAFT RISK ASSESSMENT AND DRAFT WORKPLACE POLICY GUIDE ON ENVIRONMENTAL TOBACCO SMOKE

June 22, 1990 Washington, D.C.

Thank you for joining us. As you know, the Indoor Air Division at the EPA plans to release soon a preliminary assessment of the effects of environmental tobacco smoke (ETS) on the lung, including an estimate of lung cancer deaths from ETS. The report was prepared by an outside consultant. The EPA's Indoor Air Division is also releasing a proposed guide they suggest be used by state and local officials to minimize the supposed effects of ETS in the workplace.

We understand notices of availability of these preliminary draft documents will be published in Monday's Federal Register.

The alleged scientific evidence against ETS has yet to be reviewed by the EPA's Science Advisory Board. The documents are being circulated not as EPA policy, but for comments on their technical accuracy. They have not been formally adopted by the EPA, nor

have they undergone either peer or final administrative review. We want to make sure the public understands that this is merely the beginning of a thorough review of the consultant's report.

Clearly, based on the Executive Summary of the draft risk assessment, we think these documents fall far short of accepted standards for critical scientific analysis. They omit serious consideration of major studies which don't agree with the views of certain activists in the EPA. These documents certainly can't be the basis for moving ahead with a workplace policy guide.

Here's why we think the EPA consultant's draft is more social engineering than science:

First, estimates of the relative risk of ETS and lung cancer deaths in the draft risk assessment apparently do not include results from the largest study ever done on ETS and lung cancer. That study, done by a physician at Yale University, was funded by the Kellogg Foundation and used data paid-for by the U.S. government.

The risk assessment mentions the Yale study, but does not include its results in the meta-analysis calculating the relative risk of ETS and in its estimate of lung cancer deaths from ETS. That's like mentioning to the IRS you made an additional $10,000 but not including it in your tax return.

The Yale study essentially found no statistically significant increased risk of lung cancer from ETS, either from spouse's or co-workers' smoking. Presentations at two recent scientific symposia, one in Canada and the other in Japan, also reached the same conclusions.

Second, the consultant and the Indoor Air Division have omitted a report on ETS and radon that was originally part of this current risk assessment. In the consultant's comments at a scientific conference last October, he reported he found that ETS does not enhance the harmful effects of radon. That's not the kind of news the Indoor Air Division may want you to hear.

We don't know if the report was suppressed, but we do know that this kind of research was recommended by the NAS, that this work was mentioned in EPA's 1989 Report to Congress on Indoor Air Quality and that the research was done. A reading of the Executive Summary of the draft risk assessment indicates the radon report has now been dropped.

Third, we are baffled by the strident claims about lung cancer deaths. Results of 18 of the 23 published studies on ETS and lung cancer were not statistically significant. In addition, many of the studies were conducted in other countries where the lifestyle of people is very different from our way of life. A National Academy of

Science report looked at results from U.S. studies alone and concluded, in 1986, that the results were not statistically significant. More importantly, a review of the scientific data on ETS and lung cancer -- published just several weeks ago -- concluded that scientists don't know whether ETS causes lung cancer. That review by scientists at the independent American Health Foundation was funded by the National Cancer Institute.

It appears the EPA's consultant is putting a butcher's thumb on the scale of science. He dismisses studies that did not find a statistically significant increased risk of lung cancer from ETS. For instance, the consultant virtually dismisses the 1981 American Cancer Society study which looked for but found no statistically significant increased risk of lung cancer from ETS.

At the same time, the consultant gives greater credence to a Japanese study that alleged an association between ETS and lung cancer. On numerous occasions the author of the Japanese study, Dr. Takeshi Hirayama, has refused to make his raw data available to critics who have questioned his results. Now Dr. Hirayama says that when he retired five years ago, the raw data were destroyed.

If the consultant's study on ETS was meant to be an objective report, the Indoor Air Division would have waited for the evidence from the approximately 20 ongoing U.S. studies. There are also 17 ETS studies

in progress abroad. The 1990 cost to the Federal government for nine of the studies alone is $2 million.

Fourth, the issuing of workplace guidelines at this time is a clear indication of the social engineering goal of the Indoor Air Division. The EPA does not have the authority to regulate the workplace -- that's OSHA's mission. Nevertheless, the Indoor Air Division is releasing its proposed workplace guidelines on ETS, even before the EPA's own Science Advisory Board has had a chance to review the scientific validity of the draft risk assessment.

Equally important, the Indoor Air Division must be aware that the only studies that have looked at ETS in the workplace have found no statistically significant increased risk of lung cancer from ETS.

Finally, the consultant has overemphasized the alleged link between ETS and respiratory problems in children. It is true that some studies suggest a link but, equally important, other studies don't. As Drs. Rubin and Damus noted in the Yale Journal of Biological Medicine in 1988, "most studies (about ETS and children) had significant design problems that prevent reliance on their conclusions." Studies have shown that many of the children's symptoms ascribed to ETS may be explained by other factors.

In summary, we believe that when the EPA's Science Advisory Board and the EPA Administrator look at these documents, they will also be struck by these significant omissions. The claims of lung cancer deaths are not supported by the evidence quoted, which leaves out the largest study on ETS. The draft risk assessment gives too much weight to foreign studies, and dismisses studies which don't report statistically significant increased risk of lung cancer from ETS.

Certainly, EPA should not be writing policy recommendations based on reports that has not even gone through the steps that EPA's own review process requires.

########