

SUMMARY OF TOBACCO INSTITUTE CRITICISMS OF EPA DRAFT REPORT

EPA's treatment of environmental tobacco smoke -- the smoke to which a nonsmoker may be exposed -- is without Agency precedent.

EPA uses a questionable approach to reach its conclusions. The document suggests the plausibility of its conclusions by pointing to an assumed similarity between ETS and mainstream smoke -- that which the smoker inhales -- even though the report indicates they are different.

- **The draft report concedes substantial physical and chemical differences between the mainstream tobacco smoke to which smokers are exposed and the ETS to which nonsmokers may be exposed. The draft also concedes enormous differences in the levels and routes of exposure. Never before has EPA ignored such differences in proposing to classify a substance as a Group A carcinogen.**
- **An untenable precedent will be set if ETS is classified as a Group A carcinogen based on comparisons of the smoke to which a smoker is exposed and nonsmoker ETS exposure. If containing any of the same substances as mainstream smoke is a sufficient basis for such a classification, then the air in every building and home might qualify as a Group A carcinogen. Water, hamburgers, peanut butter and many other everyday products and foods also could qualify.**

The majority of the lung cancer studies, including the most recently published ETS/lung cancer study -- one of the largest ever conducted -- report no statistically significant increase in risk.

- **If the most recent studies are added to EPA's lung cancer data base, the risk assessment's overall risk for EPA's report would be statistically nonsignificant.**
- **Over two-thirds of the studies reviewed in the EPA document do not report a statistically significant association between exposure to ETS and lung cancer among nonsmokers. Never before has EPA proposed to classify a substance as a Group A carcinogen on the basis of such weak and inconclusive data.**
- **EPA acknowledged earlier that the U.S. studies do not convincingly support the contention that ETS exposure increases nonsmoker lung cancer risk. To reach a contrary conclusion, this report adopts changed standards and statistical devices to reach a contrary -- and scientifically questionable -- conclusion.**
- **The report ignores workplace and male exposure data -- data that do not indicate an association between exposure to ETS and lung cancer -- apparently because the majority of these data do not fit the report's conclusion.**

The EPA report also discusses respiratory disorders in children. The first draft document acknowledged that the pertinent studies were too equivocal to support a causal inference. In contrast, the revised report selectively reviews the studies and fails to account for many of the flaws and inconsistencies it had earlier acknowledged.

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