

Summary of Tobacco Institute Criticisms of EPA Draft Report

The Tobacco Institute pointed out that 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 conclusion. The draft document bases its conclusions on an assumed similarity between ETS and mainstream smoke -- that which the smoker inhales. That doesn't work.

- 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 decision, then the air in every building and home might qualify for Group A treatment. Water, hamburgers, peanut butter and many other everyday products and foods might also qualify.

Even though the Science Advisory Board already has recognized that the ETS/lung cancer epidemiology results are weak, EPA also persists in selectively using this data to support its case.

- Over two-thirds of the studies reviewed in the EPA draft document do not report a statistically significant association between reported 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 had acknowledged earlier that the studies based on U.S. populations do not support the notion that ETS exposure increases nonsmoker lung cancer risk. To reach a contrary conclusion, this draft document employs a variety of artifices and statistical devices to reach a contrary -- and scientifically questionable -- conclusion.
- The draft report ignores workplace and male exposure data, apparently because the majority of this data do not fit the Agency's preconceived conclusion: the data do not show an association between exposure to ETS and lung cancer.

The EPA draft also discusses respiratory disorders in children. The previous draft 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. This is wholly inappropriate.