



INDOOR TOBACCO SMOKE IS CARCINOGENIC

Dear Commissioner Kyprianou,

The European Network for Smoking Prevention (ENSP), in its capacity as the largest NGOs working in the field of tobacco control within Europe, has for some time now been involved in an open dialogue with DG Health and Consumer Protection. We welcome the prospect of continuing this ongoing dialogue with you, Mr Kyprianou. We appreciate your involvement in the HELP campaign as well as your personal commitment to preventing young persons from taking up smoking, a position that ENSP both welcomes and shares.

ENSP's goal is to advance a step-by-step transition to tobacco-free societies by engaging with the EU DG Health and Consumer Protection. A key element of this transition is the progress towards a total ban on smoking in workplaces. Under your guidance, the EU can deliver such progress and we look forward to exploring with you how ENSP can contribute to the realisation of this vision.

In this spirit, we would like to highlight some key points that should be at the focus of discussions to move towards a total ban on smoking in workplaces and public places at EU level.

Indoor tobacco smoke is a mixture of the smoke given off by the burning end of a tobacco product (side-stream) and the smoke exhaled by smokers (main-stream). It affects air quality, particularly in enclosed spaces (indoor air pollution), as this mixture contains more than 4000 substances, more than 50 of which are known to cause cancer in humans and many of which are severe irritants.¹

The Joint Research Centre, a EU Agency commissioned by DG Sanco, in its recent INDEX reportⁱⁱ established a list of compounds that need to be regulated immediately in indoor environments. The following were classified as 'high-priority chemicals – group I compounds': formaldehyde, carbon monoxide, nitrogen dioxide, naphthalene and benzene.

All of the above compounds are present in both main-stream and side-stream smoke and are present in large concentrations in indoor environments, in particular in the hospitality sector.

The INDEX report, in its recommendations and management options, proposes that 'indoor air concentration should be kept as low as reasonably achievable, and not exceed outdoor concentrations. The report recommendations on effective management options are 'to ban benzene sources indoors'.

The EU recognises in Directive 2000/69/ECⁱⁱⁱ that benzene is 'a human genotoxic carcinogen' and that no identifiable threshold exists below which there is no risk to human health. Under this Directive, limit values for benzene in outdoor air have been set to progressively decrease until 2010 in all EU Member States towards outdoor limit values of 5 µg/m³.

Knowing that second-hand smoke contains an average level of benzene of 30 µg/m³ benzene levels in outdoor air (5µg/m³) would be lower than levels in indoor air, a situation which is profoundly incoherent, as EU citizens spend 90% of their time indoors – either at work or in their homes!^{iv}

A recent ENSP research project conducted by Professor Clancy and Professor Goodman, which aimed to assess the effectiveness of the smoking ban in Ireland, demonstrated that concentrations of benzene prior to the smoking ban were 17.9 µg/m³, while post-ban measurements showed benzene levels of 4.1 µg/m³, which represents an overall decrease of 73.1%.^v

The results of both scientific projects (the INDEX report and ENSP project) should be fully taken into account in decision-making. ENSP believes that this fact should facilitate the European Commission's decision to progress towards a total smoking ban in the workplace. **Banning smoking in the workplace is one of the most effective strategies to reduce concentrations of indoor benzene.**

All available objective studies of smoke bans have demonstrated that their impact on hospitality businesses is either neutral or beneficial, a position that should be upheld in discussions with trading and employment partners. Other economic and social concerns are unfounded and are not based on evidence.

ENSP will sustain its continued efforts to provide a science base to promote tobacco control policies, and we hope that you find this evidence useful to further our common cause. This is a pivotal time in the evolution of smoking bans. We offer you the full support of our 28 National coalitions to help find and promote solutions that are fair, equitable and coherent.

Respectfully yours,



Trudy Prins

President of the ENSP

ⁱ The ASPECT Consortium report. Tobacco or Health in the European Union. Past, present and future. October 2004, p. 33, Chapter I, – 2.3 Impact of tobacco use on others .

Deutsches Krebsforschungszentrum, Heidelberg (2005) Increased Health Hazards due to Additives of Tobacco Products – Consequences for Product Regulation.

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ⁱⁱ http://europa.eu.int/comm/health/ph_projects/2002/pollution/fp_pollution_2002_exs_02.pdf

ⁱⁱⁱ http://europa.eu.int/eur-lex/pri/en/oj/dat/2000/l_313/l_31320001213en00120021.pdf

^{iv} 22.09.2003: [Indoor air pollution: new EU research reveals higher risks than previously thought](#)

^v ENSP Framework Project 2004-2005 Health Impact Assessment of the Tobacco Ban in Ireland Research Institute for a Tobacco Free Society