



European Network for
Smoking Prevention aisbl

INDOOR TOBACCO SMOKE IS CARCINOGENIC

Dear Madam, Dear Sir,

Banning smoking in workplaces and in public places is the most effective strategy to reduce concentrations of carcinogens substances in indoor air protecting the health of the European citizens. Limit values for carcinogens in tobacco smoke cannot be established. There is no way to create a safe cigarette. A 'safe' cigarette will never exist.

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 detracts seriously of the air quality, particularly in enclosed spaces (indoor air pollution), as this mixture contains more than 4000 chemicals, more than 50 of which are known to cause cancer in humans and many of which are severe irritantsⁱ.

Exposures of non-smokers to indoor tobacco smoke results in increased risk for cancer and other diseases elicited for instance by potent lung carcinogens like (methylnitrosamino)-1-(3-pyridyl)-1-butanone (NNK)ⁱⁱ and many other chemicals.

The Joint Research Centre, a EU Agency commissioned by DG Sanco, in its recent INDEX reportⁱⁱⁱ 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 cigarette mainstream and side-stream smoke and are present in large concentrations in indoor environments, particularly 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/EC^{iv} 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 that is profoundly incoherent, as we EU citizens spend 90% of our time indoors^v

A recent ENSP research project 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%^{vi}

Indoor tobacco smoke is carcinogenic per se. Some EU countries already recognise this in their legal systems: in Germany, tobacco smoke has been classified as Class I carcinogen by the IARC and MAK^{vii}; in Finland the carcinogenicity of second-hand smoke is written into national law and endorsed by the Parliament in 2000.

Tobacco products themselves are dangerous to health. It is the exposure to the entity that determines its harmfulness, not only qualities or quantities of individual components. Evaluating safety of tobacco products based on their additives in the REACH regulation is not meaningful. The request to have a complete evaluation of additives creates confusion and covers over the evidence that tobacco smoke is a carcinogen and a toxic product in itself.

Brussels, 30th September 2005

ENSP – European Network for Smoking Prevention www.ensp.org

EFA – European Federation of Allergy and Airways Diseases Patients Associations www.efanet.org

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 .

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ⁱⁱ <http://cebp.aacrjournals.org/cgi/content/abstract/14/5/1283>

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

^{iv} http://europa.eu.int/eur-lex/pri/en/oj/dat/2000/l_313/l_31320001213en00120021.pdf

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

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

^{vii} MAK Commission of the German Research Association has classified tobacco smoke as Class I carcinogen.