

PROJECT EMN

COMMENTS ON PROJECT BY IMPERIAL TOBACCO LTD., CANADA.

Stated Objective

1. "The Study of Tobacco Products for the purpose of alleviating Perceived Health Risks."

The course of action: Design a programme that takes us from our present programme of gross reduction of toxic smoke components to a program of selective reduction of specific tobacco smoke components to reduce the specific toxicity of tobacco smoke. This programme will be based on the recommendations of medical and scientific experts.

Fundamental research is not, in itself, an objective; it is a strategy.

It is a selected course of action which affords the most support to the achievement of an objective.

2. The above project is seen in three phases:

Eliminate E
Modify M
Neutralize N

and relates to the views of other people in respect of modifications which they think should be made to a cigarette to reduce perceived health risks.

3. In more detail the project proposed is seen as follows:

Identify the Undesirables
↓
Eliminate the Undesirables
↓
Modify the Cigarette
↓
Neutralize

Comments

4. The project rationale assumes that there is a reasonably solid scientific background on which to proceed, regardless of judgements of medical authorities on the directions in which to proceed. It is proposed first of all to examine the scientific basis for action.

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5. There is a degree of unanimity between regulatory authorities on compounds in smoke which they identify as undesirable, and which do not appear to relate to consumer satisfaction. While we consider their role in cigarette smoke to be unclear, we can react or reasonably anticipate the views of regulatory authorities by reducing or eliminating these compounds from smoke. In practice, elimination of materials from smoke produced in a combustion process is practically impossible, although reductions (of varying amounts) may be an attainable objective.
6. However, there is not likely to be any consensus view on threshold levels other than the view that it should be zero, and notwithstanding para. 5 above, this is the most obvious target.
7. It will be the role of the Scientific Research Group (S.R.G.) to maintain an on-going appraisal of the scientific literature. This could include some assessment of compounds which regulatory bodies have identified. The next stage would be a programme of research based on cigarette design, combustion and filter research, designed to reduce as far as practical, identified compounds. This could be a huge amount of work, although some existing projects fall within this area.
8. In relation to reductions in specific toxicity, ranking of cigarette types in different biological tests varies according to the test. As the relevance/importance of the tests to real life situations (if any) is arguable, there is not yet a firm basis for using such tests to direct the project. This position could change, particularly if work in molecular biology, for example, clarified the relevance of particular tests.
9. The scientific basis for a "neutralization" project is even less secure than the interpretation of results from biological testing, assuming for example that it relates to the claimed effects of ingestion of Vitamin A etc. In any event this area would impinge on industries other than tobacco.
10. What is currently feasible:

Some response, in chemical terms, to the views of regulatory authorities.

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A check on the effect of any such chemically driven changes by generally accredited short term biological tests. As a starter, to determine ultimate biological end points, using existing tests the activity of the following four tobacco related products might be worth evaluating.

1. High tar plain cigarette.
2. Modern low tar filter cigarette.
3. Combustible cellulose device with added nicotine, possible burn additives.
? NSM + nicotine.
4. Favor.

11. This has broad similarities with the stated objectives of project EMN (first two parts) although these comments indicate that the project should be called IME (Identify, Modify, Eliminate).

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