

Smoking in Public Places Consultation
Scottish Executive Health Department
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Dear Sir or Madam

Smoking In Public Places: A Scottish Executive Consultation on Reducing Exposure to Second Hand Smoke. (Draft 17th August 04)

We welcome this important Scottish Executive consultation. Our joint NHS / Local Authority response reflects the importance of this issue in protecting the health of the 280,000 people who live in Forth Valley.

Tobacco smoking is the major cause of premature death in the Forth Valley population. In the 5 years from 1998 to 2002 men from the most affluent areas in Forth Valley lived 6.5 years longer than those in the most deprived areas, while women lived 4 years longer. It has been demonstrated in national studies that over half of this gap in life expectancy is attributable to tobacco smoking.

Despite action nationally and locally to reduce tobacco smoking the rate of smoking is still too high (29% of the adult Forth Valley population in year 2,000). About 750 current and ex smokers die each year in Forth Valley from smoking related disease. Too many people are exposed involuntarily to environmental tobacco smoke in work and public places (37% in Forth Valley in year 2,000).

The two main diseases caused by tobacco smoking are cancer and coronary heart disease. In the 5 years from 1998 to 2002 the standardised mortality rate (SMR) which measures the rate of premature death showed major difference in the affluent and deprived in Forth Valley. For cancer the most affluent population experienced an SMR of 52 while the most deprived population experienced an SMR of 145. For coronary heart disease the most affluent population experienced an SMR of 54 while the most deprived population experienced an SMR of 105.

We have no doubt that further action needs to be taken to reduce exposure to second-hand tobacco smoke. This is a great opportunity for Scotland to achieve a step change that will protect non-smokers from tobacco smoke and support the many smokers trying to stop. A recent evaluation of our smoking cessation clinics in Forth Valley has shown that environmental tobacco smoke at work or in pubs is one of the commonest reasons for people starting smoking again. Nicotine is a highly addictive product and environmental tobacco smoke works against the efforts of those who are trying hard to stop.

Environmental tobacco smoke contains over 20 known cancer-producing substances. There is good evidence that those who are regularly exposed to environmental tobacco smoke at their workplace or elsewhere (passive smokers) suffer significant ill health. This is apart from the irritant effects of tobacco smoking with which we can all identify. Diseases associated with passive smoking include asthma, coronary heart disease and cancer.

Chairman Ian Mullen BSc MRPharmS DL
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The 1999 U.K government policy document "Smoking Kills" set out the need to take more vigorous action on smoking. The Scottish Executive has highlighted the need for vigorous action on smoking in "Towards a Healthier Scotland" 1999, the Scottish Cancer Plan 2001, and "Improving Health in Scotland - the Challenge" 2003. The Scottish Executive recently set out a vision of a Smoke Free Scotland in "A Breath of Fresh Air for Scotland: The Challenge". A natural and logical way of achieving this vision is to ensure that public places are free of environmental tobacco smoke. This vision is achievable. Action to achieve smoke free workplaces in Ireland, USA and other countries appears to be successful.

We would strongly support a change in the law to make enclosed public places smoke free. This will protect the health of a large number of workers in Forth Valley. Many of these staff are not well paid and have little choice of moving to other smoke free occupations. The move to make trains, planes, hospitals and health centres smoke free was achieved relatively simply. There was little need for support from external enforcement agencies. NHS Forth Valley and the three Councils have smoke free workplace policies in place.

We do not support a voluntary code, as such codes have been consistently unsuccessful. Provided all pubs, restaurants and enclosed public spaces are treated similarly there should be no significant economic impact. The evidence from U.S.A and Ireland confirms this. The concept of a shared space that is smoking and non-smoking is no longer tenable. The continued exposure of workers to health risk should not be a voluntary choice of employers.

There is strong support for smoke free workplaces across all demographic groups: (U.K MORI Poll in April/May 04). Four out of five of those polled support a law that all enclosed workplaces must be smoke free.


We would not support any exemption to the legislation. However, it will be important to ensure that the definition of 'public places' does not encroach on private living areas of individuals in residential settings, such as residential care homes.

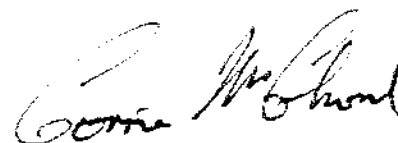
The other major action to reduce people's exposure to second-hand smoke is vigorous action to reduce the prevalence of smoking in the population. Such action includes tobacco pricing, legislation on advertising, smoking services including use of nicotine replacement therapy, school programmes and National No Smoking Day. We welcome the additional demand for smoking cessation services that the proposed legislation will undoubtedly generate. We must therefore act to strengthen smoking cessation services across Scotland before legislation is enacted. We would hope that the Scottish Executive would recognise the need for robust investment in smoking cessation services. The cost-benefit of this action will be substantial. In Forth Valley alone we estimate that some £10 million annually is used to treat tobacco-related disease while we use some £500,000 for smoking cessation services. Action to reduce smoking has been proven to be one of the most cost-effective forms of treatment.

In summary we fully support the action set out in this Bill and look forward to the health, social and economic gain for the people of Scotland.

Yours faithfully


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