



28 January 2019

European Commission

DG GROW

Mr Luca Del Colombo

Desk Officer for LVD Working Party

Brussels, Belgium

Public health organisations messages to the LVD working party ahead of 7 February 2019 meeting

Dear Mr Del Colombo,

Thank you for meeting us in Brussels on 27 June 2018 and discussing the follow up of the SCHEER opinion on the health effects of sunbeds for cosmetic purposes (1). We greatly appreciate the opportunity to share with you our views on the important issue of the safe and effective regulation of sunbeds. With this letter, we would like to convey the key messages and positions that we, the undersigned, have agreed upon in respect of ensuring greater consumer safety in sunbed use.

As organisations with a shared goal of protecting and improving public health, we would like to reiterate what has been clearly communicated in the conclusions of the SCHEER opinion: there is no safe limit to sunbed use. This statement is further supported by the 4th edition of the European Code against Cancer (2014), which issued the strongest possible advice available to the public: “do not use sunbeds” (2).

In addition, we believe that all actions related to the consumer use of sunbeds should respect and adhere to the following core principles: Ultra-Violet radiation is carcinogenic; any formation to consumers does not transform a carcinogen into a safe product; sunbed use increases the risk of skin cancer and is not recommended as a method for enhancing vitamin D status (3).

We encourage the LVD working party to take the initiative to inform the consumer more adequately and suggest the following proposals:

- Add a warning label on the sunbed device: “sunbeds cause cancer: even infrequent usage will increase your risk of skin cancer.” with accompanying pictorial warning (as per cigarette and tobacco products packaging). In the absence of an outright ban on sunbeds for commercial use, references to any supposed health benefits associated with using these devices must be prohibited (for instance, advice urging sunbed use in order to obtain the recommended daily intake of vitamin D);
- Increase market surveillance of the sunbeds with strict enforcement protocols in compliance with age requirements on sunbed use and radiation limits.



We appreciate that perspectives and viewpoints from the industry have been offered to the LVD working party in the frame of potential actions to improve the safety of consumer use of sunbeds. These proposals are consistent with the long-running strategy of the tanning industry to charm public institutions by offering assistance to produce better guidelines for the management of tanning salons (4). On the following pages you will find our response to the letter sent by Industry representatives to DG GROW.

We would welcome the opportunity to discuss further our perspective and elaborate clear objectives for protecting the health of citizens in Europe.

Sincerely yours,

Brigitte Boonen, President, Euroskin

Rüdiger Greinert, Secretary General, Euroskin

Beate Völkmer, Treasurer, Euroskin

Lill Tove Nilsen, Former President, Euroskin

Philippe Autier, Vice-President Population Research, International Prevention Research Institute (iPRI)

Jean François Doré, President, Sécurité Solaire (WHO collaborating centre)

Wendy Yared, Director, Association of European Cancer Leagues (ECL)

Véronique Del Marmol, President, Euromelanoma,

Kim Kruijt and Guy Muller, Dutch Cancer Society (KWF)

Lore Pil, Kom op tegen Kanker

Eckert Breitbart, Die Arbeitsgemeinschaft Dermatologische Prävention





Response of public health organisations to the European Sunlight Association letter addressed to DG GROW

In this letter we elaborate why most of the points presented by Industry would not guarantee consumer safety. Most important being the undesirable effect of shifting the burden of responsibility on the user of sunbeds, which is undermined by well-established scientific evidence:

- The carcinogenic effects of tanning are not immediate, therefore, influencing the risk perception of the consumer;
- The motivation to use sunbeds is mainly to tan. Tanning is always caused by DNA damage induced by UV, and this damage is the primary biological lesion involved in cancer occurrence;
- Sunbed use can be addictive for vulnerable users, thus challenging the extent to which sunbed use is a matter of free choice amongst end users.

We invite the LVD working party and interested stakeholders to pay close attention to our concerns with the proposals offered by the industry as described hereunder:

1. Marking the sunbed with the UV-index

- Agreeing on the UV-index idea equates to recognising that UV radiation from sunbeds and sunlight are the same: this is not the case as the UV-index is tailored for sun and not for sunbeds. The Global Solar UV Index (UVI) describes the sunburn-producing level of solar UV radiation at the Earth's surface.
- The UV-index is tailored for the sun irradiance, which contains a lot of UVB during midday. The sunbed UV irradiance spectrum is not that of the sun, indeed there is no natural light source on Earth that has a UV spectrum similar to that of sunbeds.
- Market surveillance reports that in most countries show that the real measured output is much higher in many cases (5).
- Finally, consumer research shows that awareness of the UV index is low. Therefore, the utility of this measure can be questioned especially when one bears in mind that the WHO recommends staying indoors at a UVI >8.

2. Add a “use responsibly” label to the sunbed

- In order to properly communicate the health risks of sunbed use, we propose that the warning label will have the following sentence: “sunbeds cause cancer: even infrequent usage will increase your risk of skin cancer,” with accompanying pictorial warning.
- There is no ‘responsible’ way to use a carcinogenic agent and, as stated, there is no safe limit of sunbed use. The risk is dose-related in a linear correlation: the more you use it the higher your risk.
- The transfer of responsibility to consumers is not acceptable: if accepted, this point will be used to turn down complaints from consumers and will be an efficient weapon for the sunbed industry to escape their responsibilities (cf. “we recommend to smokers to limit their numbers of cigarette smoked” or not to inhale asbestos).



3. Use common language for communication

- The language proposed by the industry for the “sticker on the device” is unacceptable as it compares sunbeds to the sun (we have outlined above why this is misleading and harmful). The actual biological effects due to UV exposure depend on an individual’s skin type (sensitivity to UV), but it is generally acknowledged that protection is needed when the UV index exceeds 3.
- It is only the total erythemal (sunburn) weighted UV irradiance (W/m²) that is the same for sunbeds and tropical sun. However, the spectrum of a sunbed is UVA rich and UVB poor.

4. Make more information available online

- Information to the consumer is important and can be an important measure as part of a broad range of comprehensive actions to reduce cancer risk and provide consumer safety. Who provides this information is therefore very important. If this comes from the industry, then there is a serious conflict of interest.
- The information should contain the risks and the warning that sunbeds cause skin cancer. It should not be the type of informative material disseminated by the tanning industry in the past, that can be found in an appendix of the ‘Prosafe’ report written by the European Sunlight Association (ESA), which states that sun exposure causes skin cancer but did not mention that sunbed use can also cause skin cancer, and that medical research suggests that sunbed use can prevent many internal cancers by increasing vitamin D concentrations (6).
- In most cases the consumer receives biased information in the sunbed centres. With a QR code located/placed on the sunbeds, the consumer receives the information at the point of use, which is far too late given that the consumer will have already made the choice to use the sunbed device. When the consumer has made an appointment to use a sunbed and when he/she arrives in the centre, the decision to use will be hard to influence. A QR-code on sunbeds linking to “useful information on safe sunbed use” would probably not link to unbiased information e.g. the recent WHO document on artificial tanning devices.

5. Common exposure schedules

- This will not protect consumers in a better way since exposure schedules are generic and every person’s sensitivity is highly individual. Furthermore, we must return to the firm conclusion of the SCHEER opinion: there is no safe level for sunbed use.



In addition to the above points we feel that it is important to remind LVD working party that the European Union (EU) has a legal and moral basis on which to act in this field in support of consumer interest:

- As was the case for psoralens, carcinogenic tanning accelerators that have been banned from sunscreens - EC 1223/2009, Annex II, n° 358 – the European Commission can actually regulate on such matters;
- The EU should take responsibility to advise the public to choose a healthy behaviour and encourage supportive actions to implement the messages of the European Code against Cancer.

In conclusion, we would be very happy to follow this letter up in person with a face-to-face meeting to discuss further our objectives for improving the regulation of sunbed use for cosmetic use to protect public health and to be part of the future discussions on improving health and consumer safety.

References

- (1) SCHEER (Scientific Committee on Health, Environmental and Emerging Risks), Opinion on Biological effects of ultraviolet radiation relevant to health with particular reference to sunbeds for cosmetic purposes, 17 November 2017, http://ec.europa.eu/health/scientific_committees/scheer/docs/scheer_o_003.pdf
- (2) J. Schüz, C. Espina, P. Villain, R. Herrero, M.E. Leon, S. Minozzi, et al., European Code against Cancer 4th Edition: 12 ways to reduce your cancer risk, *Cancer Epidemiol* 39 (2015) S1–S10
- (3) International Agency for Research on Cancer Working Group on artificial ultraviolet (UV) light and skin cancer. The association of use of sunbeds with cutaneous malignant melanoma and other skin cancers: A systematic review. *Int J Cancer*. 2007; 120: 1116-22.
- (4) Autier P, Doré JF, Breitbart E, Greinert R, Pasterk M and Boniol M. (2011). The indoor tanning industry's double game. *The Lancet*, 377(9774), 1299-1301.
- (5) This review (2016) shows measurements done worldwide: Nilsen L TN, Hannevik M and Veierød MB. (2016). UV exposure from indoor tanning devices: A systematic review. *Br J Dermatology* 174; 730-40.
- (6) Autier P, Mullie P, Macacu A, Dragomir M, Boniol M, Coppens K, Pizot C, Boniol M. Effect of vitamin D supplementation on non-skeletal disorders: a systematic review of meta-analyses and randomised trials. *Lancet Diabetes Endocrinol*. 2017 Dec;5(12):986-1004.
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Scragg R, Khaw KT, Toop L, Sluyter J, Lawes CMM, Waayer D, Giovannucci E, Camargo CA Jr. Monthly High-Dose Vitamin D Supplementation and Cancer Risk: A Post Hoc Analysis of the Vitamin D Assessment Randomized Clinical Trial. *JAMA Oncol*. 2018 Jul 19:e182178.