

Kenneth Macintosh MSP  
Co-Convenor of the Cross Party Group on Cancer  
East Renfrewshire Parliamentary Office  
238 Ayr Road  
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East Renfrewshire  
G77 6AA

31st July 2006

Dear Mr. Macintosh,

**RE: The Regulation of Sunbed Parlours Bill, A Consultation**

Background

Cancer Research UK Scotland is an operating division of Cancer Research UK<sup>1</sup>. Funds raised by Cancer Research UK Scotland are applied for the general purposes of Cancer Research UK.

This year alone, Cancer Research UK will spend over £25 million in Scotland on some of the UK's best science and clinical research. These funds will be invested in the work of scientists, doctors and nurses in hospitals, medical schools, universities and research institutes in Aberdeen, Dundee, Edinburgh, Glasgow and Stirling.

We now believe around half of all cancers could be prevented by changes to lifestyle. Cancer Research UK encourages individuals to protect themselves from excessive exposure to harmful ultra violet (UV) radiation, in order to minimise their risk of developing skin cancer. This includes protection from the UV rays emitted by sunbeds.

Cancer Research UK welcomes the opportunity to respond to this consultation. We are strongly supportive, in principle, of the proposals to regulate the use of cosmetic sunbed premises in Scotland.

**Scotland is experiencing a skin cancer epidemic**, as the consultation document highlights. Incidence of skin cancer has tripled in the last thirty years. There were over 7000 cases of skin cancer diagnosed in 2001, up from around 2200 in 1975. Higher rates of melanoma incidence have been reported in Scotland than in the rest of the UK.

**We know that sunbed use increases risk of skin cancer. We therefore believe that the regulation of cosmetic sunbed premises would help to tackle the skin cancer epidemic in Scotland.**

Cancer Research UK's SunSmart Campaign

Cancer Research UK runs a national skin cancer prevention campaign, SunSmart, with the support of the UK Health Departments and thus has a long-standing interest in this issue. Now in its fourth year, the campaign aims to raise awareness of skin

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<sup>1</sup> Charity Number 1089464

cancer and to encourage people to protect their own and their children's skin from harmful UV exposure.

### Sunbeds

Cancer Research UK supports Kenneth Macintosh MSP's proposal that cosmetic sunbed premises must gain a license to operate from a local authority. We welcome the proposal that such a license would:

- Prevent the use of sunbeds by children
- Protect adults from over-exposure
- Ensure that sunbed users are supervised
- End the use of coin-operated machines
- Ensure that sunbed sessions are monitored and limited
- Provide health risk information in sunbed salons
- Provide an opportunity for premises to be inspected

We have made specific comments on a number of the consultation questions below:

#### **Q1: What do you consider would be the benefits from regulation of cosmetic sunbed premises? What do you consider if any, would be the drawbacks?**

Cancer Research UK advises against the use of artificial tanning devices for cosmetic purposes. The benefits that we hope will arise from regulation of cosmetic tanning premises include better health and safety awareness of the risks of using a sunbed. Regulation will help to encourage an end to the use of tanning devices by under-16 year olds and see an end to the use of unmanned coin-operated sunbeds. Regulation should also serve to make adults more aware of the risks involved in using a sunbed so that they can make an informed decision about use.

Licensing would also mean that it would be possible to accurately identify the locations of sunbeds including coin-operated salons. There are potentially serious long-term health issues for people using sunbeds. Accurately locating sunbed outlets is the first step to ensuring the health of the public is adequately protected.

Cancer Research UK is calling for permanent warning signs on all sunbeds, which could also be introduced through a licensing scheme. Notices should describe people most at risk of skin cancer- those with fair hair, freckles, moles, or whose skin burns easily- and advise these people not to use sunbeds.

Ultimately we would hope that regulation of sunbed premises would lead to an overall reduction of incidences of skin cancer in Scotland.

#### **Q2: Is there any additional evidence of the risks, or otherwise, of sunbed use that you can provide?**

The Scientific Committee on Consumer Products (SCCP) recently published an opinion on sunbed use. The opinion is built on existing evidence highlighting that use of artificial tanning devices is likely to increase the risk of malignant melanoma and possibly ocular melanoma.<sup>2</sup>

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<sup>2</sup> Scientific Committee on Consumer Products, "Biological Effects of ultraviolet radiation relevant to health with particular reference to sunbeds for cosmetic purposes," page 30 (2005)

**Q3: How would licensing of salons help to change users perceptions of the risks involved? What other methods could be used to affect perceptions?**

Anecdotal evidence suggests that many sunbed users assume that sunbed rays are 'safe' and have had all of the dangerous 'rays taken out'. Licensing of salons would ensure that health-risk information and guidance is produced, sending a clear signal that there are health implications associated with the use of sunbeds. This will enable adults to make an informed decision about their choice to use a sunbed and to protect under-16 year olds from their use. A licensing scheme would reinforce the dangers of sunbed use and reinforce the requirement for Member States to ensure that appropriate warnings and instructions are provided as outlined in the European Commission's SCCP opinion.

**Q4: If cosmetic sunbed premises were to be regulated, what body or bodies would be best placed to do so? What degree of flexibility should a regulator have?**

Cancer Research UK is not an expert in this area. However, it is important that whichever enforcement body is tasked with the regulation of sunbed premises has the appropriate training and resources to do this effectively.

**Q5: How should the costs of the enforcing body be covered?**

Cancer Research UK is not best placed to answer this question; however there will clearly be cost implications with regulation of sunbed premises. These must be considered and adequate funding provided so that regulation is effective.

**Q6: What costs and savings do you think will arise as a consequence of this proposal?**

Cancer Research UK would hope that such a measure will reverse the tide of the current skin cancer epidemic in Scotland. We would also hope that there are additional effects from increased public knowledge as to the health risks associated with sunbeds and that behaviour is altered. This change in behaviour may translate into financial savings particularly for health services.

In regards to the demand on NHS services, skin complaints comprise 10-25 per cent of general practice workload.<sup>3</sup> It is estimated that skin cancer accounts for 30 per cent of a consultant dermatologist's workload and one third of all the plastic surgery on the NHS.<sup>4</sup> Although the costs of skin cancer are not available for Scotland, a recent report revealed the total cost of skin cancer in England to be in excess of £190million in 2002, of which 37 per cent (£71million) was borne by the NHS.<sup>5</sup> It has been estimated that 63 per cent of the total cost of skin cancer was due to malignant melanoma.<sup>6</sup>

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<sup>3</sup> British Association of Dermatologists (2005), GP Training Report, accessed at: <http://www.bad.org.uk/healthcare/primary/training/report.asp> on 8 December 2005.

<sup>4</sup> APPGS (2003), All Party Parliamentary Group on Skin, Report on the enquiry into the treatment, management and prevention of skin cancer, London.

<sup>5</sup> Morris, S., Cox, B., and Bosanquet, N., *Cost of Skin Cancer in England Report*, Imperial College London, 2005.

<sup>6</sup> Morris, S., Cox, B., and Bosanquet, N. *Cost of Skin Cancer in England Report*, Imperial College London, 2005.

For further information or clarification on any issue raised in this response, please contact the Cancer Research UK Public Affairs Department at [publicaffairs@cancer.org.uk](mailto:publicaffairs@cancer.org.uk) or on 020 7061 8360.

Yours sincerely,

A handwritten signature in black ink that reads "Sara Hiom". The signature is written in a cursive, flowing style.

Sara Hiom  
Head of Health Information, Cancer Research UK