

Rue de la Loi 200
B-1049 Brussels
Belgium

6 March 2006

Dear Ms. Peetso,

RE: SCCP Preliminary Opinion on biological effects of ultraviolet radiation relevant to health with particular reference to sunbeds for cosmetic purposes

Background

Cancer Research UK¹ is the world's largest independent organisation dedicated to cancer research, with an annual research spend of over £217 million.

In the UK, the incidence of malignant melanoma is increasing at a rate faster than that of any other cancer, and more than 2,000 people die from skin cancer each year.

The growth in UK incidence rates over the past twenty years is a clear indication of the need for continuing public education on how to reduce the risk of developing skin cancer and how to detect the early signs.

Cancer Research UK position

Cancer Research UK welcomes the publication of the Preliminary Opinion and the opportunity to comment on the Opinion's findings.

We support the Opinion's overall conclusion that the use of sunbeds to achieve and maintain cosmetic tanning is likely to increase the risk of malignant melanoma. We also agree that people with known risk factors for skin cancer should be advised against sunbed use.

Cancer Research UK runs a national skin cancer prevention campaign, SunSmart, with the support of the UK Health Departments. The campaign aims to raise awareness of skin cancer and to encourage people to protect their own and their children's skin in the sun. We strongly advise children (under 16 years of age) never to use sunbeds. We also recommend that those with fair or freckly skins, a lot of moles, who have had skin cancer in the past, with a family history of melanoma and/or those using medication that increases sensitivity to UV, do not use sunbeds for cosmetic purposes.

We know that sustained public health promotion has helped to cut deaths from and initiate a reduction in incidence of malignant melanoma in the younger generations in

¹ Registered charity no. 1089464

Australia.² This has been achieved by raising awareness, influencing attitudes, facilitating behaviour change and encouraging people with early curable disease to seek treatment.

We believe that long-term skin cancer prevention campaigns are necessary in EU Member States to increase public knowledge, alter attitudes and affect the behavioural changes needed to reverse the trends in skin cancer incidence across the Community. We hope that Member State Governments and/or EU-level funding bodies will commit to the core-funding of such campaigns.

Cancer Research UK is very concerned by the current high level of use of tanning devices for cosmetic purposes, and especially the reported increasing use by children.

In light of the Opinion and our SunSmart campaign, we would support Commission action to introduce appropriate risk management measures warning against sunbed use. Specifically, we would support the mandatory introduction of notices in salons describing those most at risk from skin cancer and advising them against sunbed use. We would also like to see all sunbeds manufactured and sold in the EU bearing a permanent statement warning of the risks associated with use. Adults are free to make their own decisions about using sunbeds, but they should do so knowing the risks involved.

We believe that the use of artificial tanning devices should be restricted to over-16s and unmanned coin-operated sunbeds should be phased out. We also believe that the feasibility of regulating the operation of sunbed salons, for example through a licensing scheme, should be considered.

Cancer Research UK looks forward to the publication of the Final Opinion, and to working with the Commission on future initiatives in this area.

For further information or clarification on any point raised in this response, please contact the Cancer Research UK Public Affairs Department at publicaffairs@cancer.org.uk or on 0207 061 8360.

Yours sincerely,



Sara Hiom
Head of Health Information, Cancer Research UK

² Montague, M; Borland, R; Sinclair, C (2001) Slip! Slap! Slop! and SunSmart 1980 to 2000: Skin cancer control and 20 years of population based campaigning. *Health Education and Behaviour*: 28:3.