

Cancer Research UK submission to the Scottish Parliament's Health and Sport Committee's call for evidence on the Public Health etc. (Scotland) Bill

December 2007

Introduction

Cancer Research UK¹ is the world's largest independent organisation dedicated to cancer research. We funded £315 million of research last year. Our vision is that together we will beat cancer.

Cancer Research UK welcomes the opportunity to respond to this call for evidence. We would specifically like to comment on part 8 of the Bill: Information on Health Effects of Sunbeds.

We would be happy to provide further oral evidence to the Health and Sport Committee on any of the issues raised in this response, should that be helpful.

The Public Health etc. (Scotland) Bill

Cancer Research UK is supportive of the provisions outlined in the Public Health etc. (Scotland) Bill to require operators of sunbed premises to provide information to users of those premises regarding the effects on health of sunbed use. However, we believe that further provisions should be incorporated into the Bill to i) ban unstaffed or coin-operated sunbeds, ii) enforce an age limit of 18 for sunbed salons and iii) ensure that sunbed salons are regularly inspected.

Sunbeds and skin cancer

The risks

Cancer Research UK does not recommend the use of sunbeds for cosmetic purposes.² There is increasing evidence to suggest that the use of sunbeds is likely to increase the risk of malignant melanoma, especially in people who find it difficult to tan. The International Agency for Research on Cancer (IARC) recently concluded that there is convincing evidence to support a causal relationship between sunbed use and skin cancer, particularly with exposure before the age of 35 years.³ It has

¹ Registered charity no. 1089464

² Sunbeds can also be used for medicinal purposes.

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 [epub ahead of print] (2006).

been estimated that sunbeds cause 100 deaths from melanomas every year in the UK.⁴

Sunbeds have been linked to a variety of poor health conditions including eye damage, photodermatosis, photosensitivity, premature skin ageing and skin cancer.⁵ UV rays from sunbeds have been classified as Group 2A carcinogens by IARC, which means they probably cause cancer in humans.⁶ The UV emissions from many sunbeds are greater than those from the midday sun in the Mediterranean.^{7,8,9}

A study carried out in Perth and Kinross showed a 30% increase in the number of privately operated sunbeds in the past decade, and recorded that 83% of sunbeds produced ultraviolet (UV) B radiation levels that exceeded the European standard. In addition, fifteen per cent of sunbed users who took part in a questionnaire thought that there were no risks from use of sunbeds. The study concluded that “there is a strong case for regulation of sunbed operators coupled to improved public education”.¹⁰

Malignant melanoma

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

The growth in UK incidence rates over the past 20 years is a clear indication of the need for continued prevention and early treatment to avert the potential loss of many years of life. On average, about 20 years of life are lost for each melanoma death in the UK.¹¹

Cost benefit to the NHS

In regards to the demand on NHS services, skin complaints comprise 10-25 per cent of general practice workload.¹² 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.¹³ 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.¹⁴ It has been estimated that 63 per cent of the total cost of skin cancer was due to malignant melanoma.¹⁵

⁴ Diffey, B. A quantitative estimate of melanoma mortality from ultraviolet A sunbed use in the UK. *Br J Dermatol* 149, 578-81 (2003).

⁵ Spencer, J. & Amonette, R. Indoor tanning: risks, benefits and future trends. *J Am Acad Dermatol* 33, 288-98 (1995).

⁶ IARC. Solar and ultraviolet radiation. (IACR Press, Lyon, 1992).

⁷ Gerber, B., Mathys, P., Moser, M., Bressoud, D. & Braun-Fahrlander, C. Ultraviolet emission spectra of sunbeds. *Photochem Photobiol* 76, 664-8 (2002).

⁸ Wester, U., Boldermann, C., Jansson, B. & Ullen, H. Population UV-dose and skin area- do sunbeds rival the sun? *Health Phys* 77, 436-40 (1999).

⁹ Young, A. Tanning Devices – fast track to cancer? *Pigment Cell Res* 17, 2-9 (2004).

¹⁰ Oliver H, Ferguson J, Moseley H. Quantitative risk assessment of sunbeds: impact of new high power lamps. *British Journal of Dermatology* 2007; 157: 350-356.

¹¹ Statistical Information Team Cancer Research UK (2006) 'CancerStats, Malignant Melanoma-UK' Information available online at <http://cancerresearchuk.org/cancerstats/>

¹² British Association of Dermatologists (2005), GP Training Report, accessed at: <http://www.bad.org.uk/healthcare/primary/training/report.asp> on 8 December 2005.

¹³ APPGS (2003), All Party Parliamentary Group on Skin, Report on the enquiry into the treatment, management and prevention of skin cancer, London.

¹⁴ Morris, S., Cox, B., and Bosanquet, N., *Cost of Skin Cancer in England Report*, Imperial College London, 2005.

¹⁵ Morris, S., Cox, B., and Bosanquet, N. *Cost of Skin Cancer in England Report*, Imperial College London, 2005.

Young People

We are especially concerned by the use of sunbeds by young people as we know that younger skin is at particular risk.¹⁶ We believe that under-18s should not be permitted to use sunbeds and support the banning of unstaffed, coin-operated salons as a matter of priority.

Regulation

Voluntary regulation of the sunbed industry is currently inconsistent and largely unmonitored, and we believe this places users at greater risk. In addition, there is evidence that some communications from the industry have dismissed the health risks associated with sunbed use and marketed the benefits of use for the maintenance of adequate Vitamin D levels.¹⁷ We therefore support the principle of further regulation of sunbed salons and other premises offering the use of tanning facilities to members of the public.

Further research

There is much that is not known about patterns of sunbed use in the UK. For example, though we believe that sunbed salons are more likely to be situated in deprived areas, we have limited knowledge about the exact location of premises, the cost of sessions and the safety guidelines that are adhered to.

Cancer Research UK has identified a number of evidence gaps and future research needs,¹⁸ which once fulfilled would give a more complete picture of sunbed use across the UK. This, in turn, would help us to provide more relevant health information resources to users and to better target our public information work. We hope that we can work in partnership with others, including Government, to increase knowledge in this area.

Support for further action

When Ken Macintosh MSP first introduced his Proposed Members' Bill on sunbed licensing in December 2006 it attracted support from 66 MSPs from across the party spectrum. In addition, the vast majority of the 54 respondents to Mr Macintosh's consultation were in favour of further regulation with 77% offering strong support, 17% offering support with some reservations and only two respondents stating explicitly that they did not support regulation of the sunbed industry. Respondents included Local Authorities, health organisations and charities, health professionals and trade and business associations.

Furthermore, the Convener of the Public Petitions Committee, in response to petition PE931 from Skin Care Campaign Scotland, stated, "It is probably best for us to keep hold of the petition and then see whether Ken Macintosh makes progress with his bill in session 3. I note that the proposal had the support of more than half of MSPs when it was first made. It is very much in the interests of the Parliament to pursue the

¹⁶ 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* [epub ahead of print] (2006).

¹⁷ Advertising Standards Agency Adjudication- objection upheld against The Sunbed Association for production of a leaflet stating 'Vitamin D essential for good health, Sunbed sessions ARE good for you.' 7th September 2005.

¹⁸ Executive Summary of Cancer Research UK Sunbed Symposium, Cancer Research UK (2006), available at www.sunsmart.org.uk.

matter. We should keep hold of the petition to ensure that it gets progressed.”¹⁹ At its meeting of 4 December 2007, the Committee agreed “to seek a further response from the Scottish Government on the progress being made in this area, including provisions within the Public Health (Scotland) Bill.”²⁰

There is also currently strong public support for regulating the sunbed industry. A recent survey of 2000 people showed that almost 9 in 10 (89%) agree that the sunbed industry should be regulated (77% strongly agree, 12% agree).²¹

Developments across the UK

In its recently published Cancer Reform Strategy, the UK Department of Health has committed to “review...options for regulation of the industry and as a first step...gather more information about the number and distribution of sunbeds and the scale of sunbed use by minors. It is important that the Department of Health and the Health and Safety Executive, in consultation with other stakeholders including Cancer Research UK, consider ways in which a balance can be struck between consumer safety and choice.”²²

SunSmart

SunSmart is the UK’s national skin cancer prevention campaign. It is commissioned by the UK Health Departments and run by Cancer Research UK. The SunSmart campaign aims to:

- Increase knowledge of the causes of skin cancer and the importance of early detection among defined target groups;
- Increase awareness of actions that can be taken to prevent skin cancer; and
- Positively influence attitudes to sun protection.

We believe that long-term skin cancer prevention campaigns are necessary to increase public knowledge, alter attitudes and affect the behavioural changes needed to reverse the trends in skin cancer incidence across the UK.

Visit www.sunsmart.org.uk for more information.

We would be happy to provide any further information or detail as required. Please contact Vicky Crichton, Public Affairs Officer for Scotland at vicky.crichton@cancer.org.uk or on 0131 310 4368.

¹⁹ Official Report, Scottish Parliament Public Petitions Committee, 20 March 2007

<http://www.scottish.parliament.uk/business/committees/petitions/or-07/pu07-0402.htm#Col3112>

²⁰ Minute of Proceedings, Scottish Parliament Public Petitions Committee, 4 December 2007

<http://www.scottish.parliament.uk/s3/committees/petitions/mop-07/pumop07-1204.htm>

²¹ The survey by BMRB Omnibus was conducted by telephone over 14-16 September 2007, among 2000 adults aged 16 plus. Results were weighted to make them nationally representative.

²² Department of Health, Cancer Reform Strategy, 2007 p40.