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**The Royal Australasian College of
Physicians' submission to the
Health Select Committee**

**Sunscreen Product Safety Standard
Bill**

Haratua 2021

Introduction

The Royal Australasian College of Physicians (RACP) welcomes the opportunity to submit feedback on the Sunscreen product Safety Standard Bill.

The RACP works across more than 40 medical specialties to educate, innovate and advocate for excellence in health and medical care. Working with our senior members, the RACP trains the next generation of specialists, while playing a lead role in developing world best practice models of care. We also draw on the skills of our members, to develop policies that promote a healthier society. By working together, our members advance the interest of our profession, our patients and the broader community.

Overall Position

The RACP is strongly supportive of action to regulate safety standards for sunscreen. Action must be taken to ensure confidence and quality in these products, as recent inquiries have shown that some consumer sunscreens sold in Aotearoa NZ fail to live up to their claimed sun protection factor (SPF)^{1 2}.

We support the intention of the Bill to set standards reflecting AS/NZS 2604:2012. The standard has been successfully deployed for sunscreen with mandatory compliance in Australia, and has been updated as developments have become apparent, maintaining itself as a reliable, quality standard for regulation. This provides assurances for implementation with mandatory compliance in Aotearoa NZ.

The Burden of Skin Cancer in Aotearoa NZ

Aotearoa NZ has one of the highest rates of skin cancer in the world, resulting in approximately 500 deaths a year^{3 4}. Four out of five of these deaths are attributed to the most dangerous form of skin cancer, Melanoma, despite its incidence being less than other forms of skin cancer such as basal cell and squamous cell carcinomas³. Mortality rates for Melanoma have not decreased substantially in recent years, and unless action is taken, avoidable harm will continue at these levels into the foreseeable future.

Prevention, and the Role of Sunscreen

The primary avenue of prevention for Melanoma and other skin cancers, is through limiting the exposure of skin to ultraviolet (UV) radiation exposure. Application of sunscreen capable of preventing a proportion equal to, or greater than SPF 30, is a key factor in achieving this in day-to-

¹ Consumer NZ. Two more sunscreens fail SPF test [Internet]. Wellington: Consumer NZ; 2021. Accessed 20 May 2021. Available from: <https://www.consumer.org.nz/articles/two-more-sunscreens-fail-spf-test>.

² Consumer NZ. Why sunscreens should be regulated [Internet]. Wellington: Consumer NZ; 2021. Accessed 20 May 2021. Available from: <https://www.consumer.org.nz/articles/sunscreens/know-the-issue>.

³ Best Practice Advocacy Centre New Zealand. Reducing the burden of melanoma in New Zealand [Internet]. Dunedin: Best Practice Advocacy Centre New Zealand; 2020. Accessed 20 May 2021. Available from: <https://bpac.org.nz/2020/melanoma-part1.aspx>.

⁴ Cancer Society Social and Behavioural Research Unit. SBRU Fact Sheet – Skin Cancer in New Zealand [Internet]. Dunedin: University of Otago; 2018. Accessed 20 May 2021. Available from: <https://www.otago.ac.nz/sbru/otago687389.pdf>.

day life in Aotearoa NZ. For consumers to achieve this, sunscreens must provide reliable protection to the level claimed in their advertising, and on their packaging. Despite this, not all sunscreens in the market live up to their claims, with Consumer NZ finding that five of the ten sunscreens it tested do not provide the levels of protection claimed⁵. These discrepancies are significant, with sunscreens claiming high protection of SPF 30 only providing moderate protection of SPF 15 to 25, and others that claimed very high protection also falling short.

Narrow Focus of the Bill, and the Wider Context

While the RACP supports the setting of regulations as proposed in the Bill, we believe that it only addresses a narrow issue with sunscreen in our regulatory environment. It fails to consider the wider environment, and other problems with the use of sunscreen to prevent skin cancer, such as access.

Sunscreen use is recommended in Aotearoa NZ on every day that where the UV index reaches three or above⁶. There is strong evidence that use of sunscreen on every such day reduces the risk of skin cancer, however, it is recognised that cost is a barrier to this. Sunscreen cost disparities are stark between Aotearoa NZ and similar countries such as Australia, with The Spinoff noting that for a similar price, people in Aotearoa NZ get one tenth the volume of sunscreen that Australians do⁷. The RACP believes that we need to address this issue, to enable equitable access to products which contribute to skin cancer risk reduction, such as through a Government subsidy to reduce cost to whānau.

Conclusion

The RACP thanks the Health Select Committee for the opportunity to provide feedback on this consultation. To discuss this submission further, please contact the Aotearoa NZ Policy and Advocacy Unit at policy@racp.org.nz.

Nāku noa, nā



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⁵ Stuff. Five out of ten sunscreens don't meet SPF claims - Consumer NZ [Internet]. Wellington: Stuff; 2020. Accessed 20 May 2021. Available from: <https://www.stuff.co.nz/business/123615627/five-out-of-ten-sunscreens-dont-meet-spf-claims--consumer-nz?rm=a>.

⁶ Whiteman D C, Neale R E, Aitken J, Gordon L, Green C A, et al. When to apply sunscreen: a consensus statement for Australia and New Zealand. Aust N Z J Public Health [Internet]. 2019; 43(2): 171-175. Accessed 20 May 2021. Available from: <https://pubmed.ncbi.nlm.nih.gov/30681231/#:-:text=Conclusions%3A%20People%20living%20in%20Australia,to%20reach%203%20or%20above>.

⁷ The Spinoff. We all scream for sun cream: So why is sunscreen so expensive in New Zealand? [Internet]. Auckland: The Spinoff; 2020. Accessed 20 May 2021. Available from: <https://thespinoff.co.nz/society/08-01-2020/we-all-scream-for-sun-cream-so-why-is-sunscreen-so-expensive-in-new-zealand/>.