

# Comments for Public Consultation on Preliminary Opinion on Biological effects of ultraviolet radiation relevant to health with particular reference to sunbeds for cosmetic purposes

Mariano Suppa, MD



**European  
Dermatology  
Forum**



# \* Joint contribution by:

- \* EADV - European Academy of Dermatology and Venereology
  - \* representing almost 5000 Dermatologists from Europe and beyond
- \* EDF - European Dermatology Forum
  - \* representing approximately 200 active members consisting of heads of academic departments and key opinion leaders in dermato-venereology across Europe
- \* EADO - European Academy of Dermato-Oncology
  - \* representing 400 members from more than 40 countries and a variety of disciplines -- dermatologists, oncologists and clinical as well as basic research scientists
- \* EUROMELANOMA
  - \* Pan-European skin cancer campaign, active in 33 countries

# \* We approve of report's conclusions:

- \* UV is a complete carcinogen, acting both as an initiator, through genotoxicity, and as a promoter, through immunosuppression.
- \* Sunbed use increases the risk of cutaneous melanoma, squamous cell carcinoma and, to a lesser extent, basal cell carcinoma, especially when first exposure takes place at an early age and with a dose-response effect
- \* There is moderate evidence that sunbed exposure may also cause ocular melanoma.

- \* Sunbed use is responsible for a noticeable proportion of both melanoma and non-melanoma skin cancers
  - \* 5.4% of newly diagnosed melanomas each year may be related to indoor tanning
  - \* this association is particularly valid for early-onset melanomas (before age 30)
  
- \* The potentially beneficial effects of sunbed use are more than outweighed by the many severe adverse effects
  - \* there is no need to use sunbeds to boost Vitamin D synthesis
  - \* UV overexposure may actually reduce vitamin D levels
  
- \* There is no safe limit for UV irradiance from sunbeds because:
  - \* sunbed exposure has a carcinogenic effect
  - \* there are no indications for threshold levels of UV-irradiance and UV-dose for skin cancer induction