

SCENIHR Public Hearing
Luxembourg, April, 12th 2016

- 1903 NOBEL Prize for medicine for Dr. Niels Finsen “ in recognition of his contribution to the treatment of diseases with concentrated light radiation.”
- 1975 engineer Friedrich Wolff patented the sun bed , the predecessor of todays modern sun beds

- At the peak of the tanning industry there had been approx. 50 manufacturers of tanning equipment in Europe – today there are 5 left who are operating international
- Tanning bed manufacturers and lamp producers report a decrease in sales over the last 10 years of approx. 40 %

- The draft report states:
 - The summary prevalence of last year exposure was 14.0%
 - An increase in prevalence of sunbed use over time was noted
- Where are these statements based on?
 - Data shown in annex II of the draft
 - Denmark 2007 – 2009 (Koster) showed a decrease
 - USA 2009 - 2011 (Guy) showed a decrease
 - Wehner 2014 showed a decrease for Europe

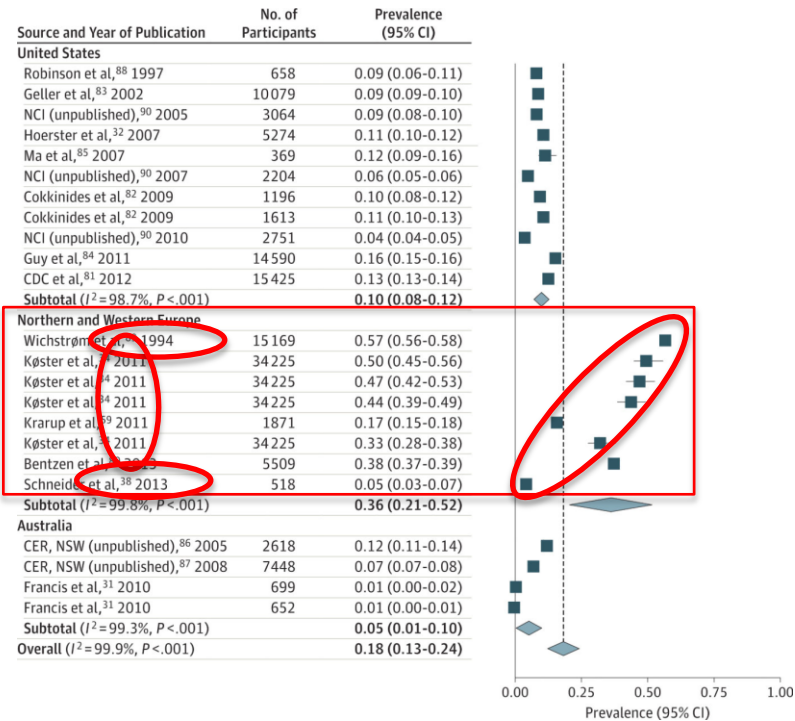
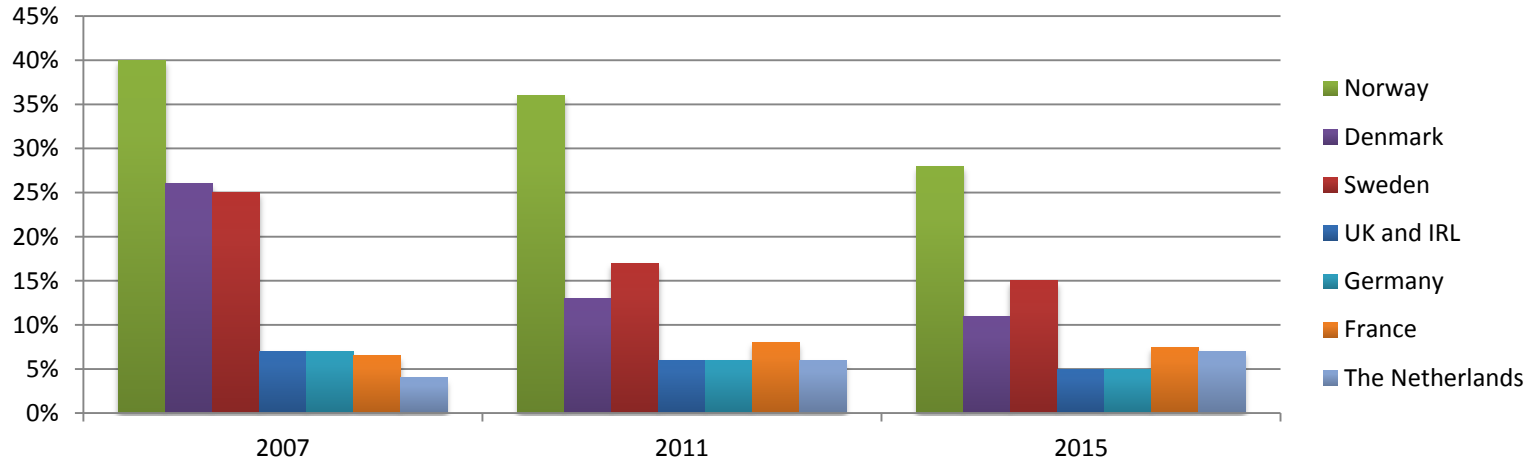


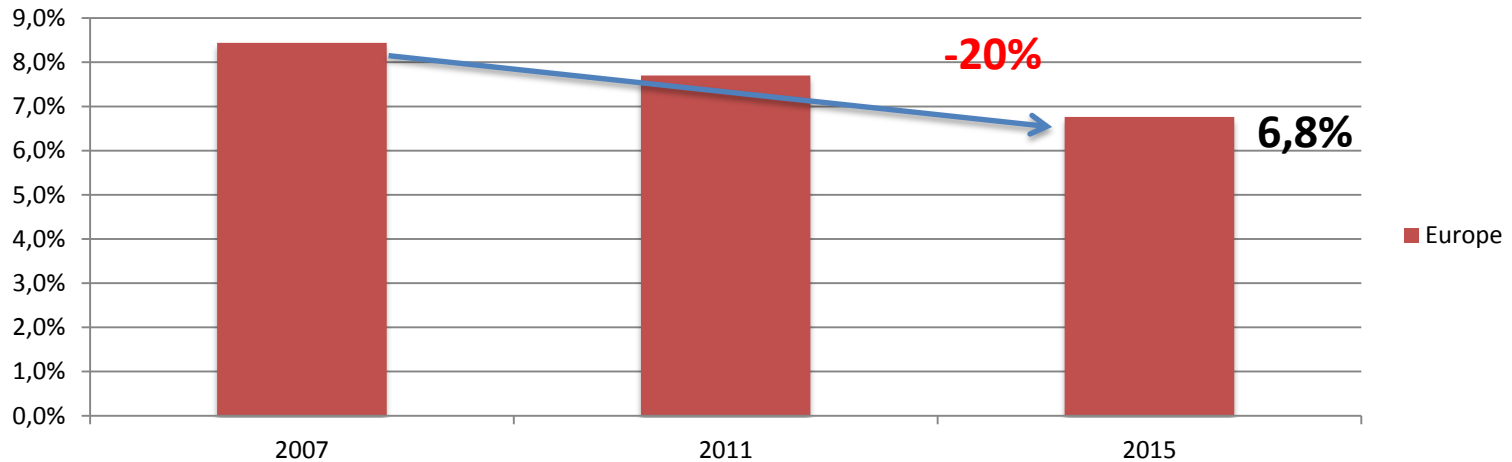
Figure 7. Forest Plots of Primary Analyses: Past-Year Exposure in Adolescents

Past-year exposure in adolescents. Plots show point prevalence (squares), 95% CIs (horizontal lines), summary prevalence and 95% CIs for each region and overall (diamonds, the width of which represents the 95% CIs), and summary prevalence estimate (dotted line). Records are listed by date of publication and then by date of data collection. (See eTable 1 in the Supplement for full citations and descriptions.) CDC indicates Centers for Disease Control and Prevention; CER, Centre for Epidemiology and Research; NCI, National Cancer Institute; NSW, New South Wales.

Frequent tanner in Population [%]



Frequent tanner in Population [%]



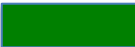
- If the increase of skin cancer incidence can be related to UV exposure
- then, since the estimated values of prevalence in the draft report are too high, any calculated value for incidences or mortality of skin cancer associated to sunbeds are too high too

- Reduction of irradiance of sunbeds to $0.3\text{W}/\text{m}^2$
- Clear identification of suitable replacement lamps (X-Y-Code range)
- New warnings and information
 - Not to be used under the age of 18
 - Re-wording of skin type, mole, freckles, risk factors
- But this holds only for NEW products!

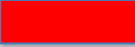
Implementation in the market place.

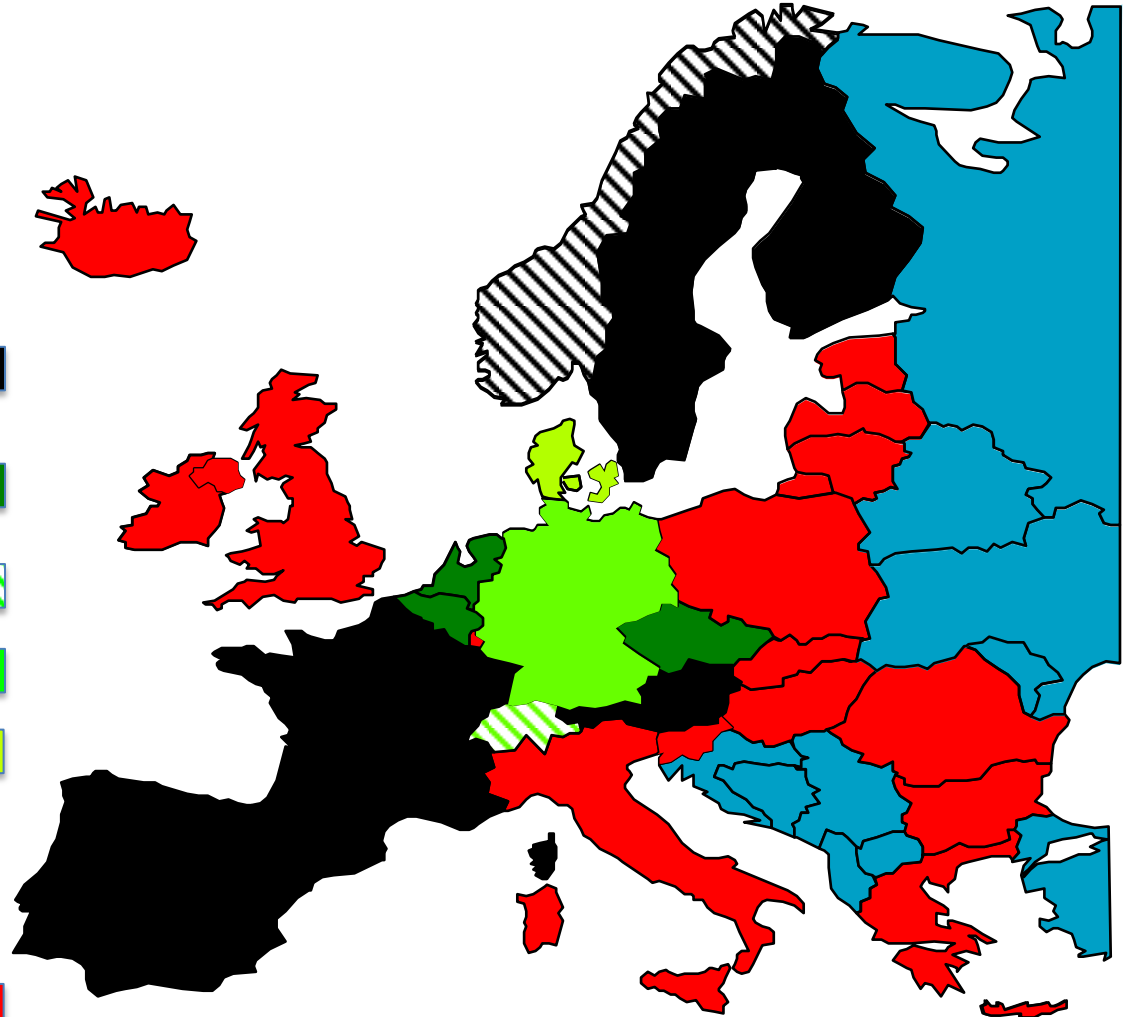
- **Different interpretation of the Product Safety Directive by the member states**

- **Implementation of irradiance limit of 0.3 W/m²**

- **Already in place in 2007** 
 - Sweden, Finland, France
 - Spain, Portugal, Austria, Norway
- **2007** 
 - Netherlands, Belgium, Czech Republic
- **2009** 
 - Switzerland
- **2012** 
 - Germany
- **2014** 
 - Denmark

- **Just 5 out of 28 member states took action**

- **Not yet implemented in** 
 - UK, Italy, Poland, Greece, Ireland, Iceland, Lithuania, Latvia, Estonia, Cyprus, Malta, Romania, Bulgaria, Slovenia, Slovakia, Luxembourg



- It's like setting a general European speed limit of 120km/h
 - as long as some member states do not implement it
 - as long as no police gets a radar gun and enforce it
- There will be plenty of cars still going as fast as the driver wants

- We have partnered up through ESA (European Sunlight Association) with Market Surveillance Authorities (Prosafe) as far as they were interested
- We have pushed some authorities to take action via the national indoor tanning associations
- We have strongly supported the development of a training & service standard (EN16489, Parts 1-3) for the salon operator

- Why are travels to the south not mentioned as cofounders of skin cancer?
 - German flights¹ for beach holidays 2008 -> 2014 +20%
 - Giving 30 Mio. Germans doing beach holidays
 - While only 4 Mio. Germans use indoor tanning
 - Swedish flights² for beach holidays 2010 -> 2014 +40%
 - Giving 4 Mio. Swedes doing beach holidays
 - While only 1.4 Mio Swedes use indoor tanning
 - UK flights³ for beach holidays 2007 -> 2014 +21%
 - Giving 84 Mio. Brits ($\approx 1,3 \times$ popul.) doing beach holidays
 - While only 3,4 Mio. Brits use indoor tanning

¹ ATS 2015

² Sweavia 2016

³ CAA Passenger Survey Report 2014

- Why are sunscreens not mentioned as cofounders of skin cancer?
- Sunscreens reduce the UVB by at least a factor of 6
- Sunscreens reduce the UVA by at least 1/3 of the UVB reduction
 - Example SPF 30:
 - Due to the UVB reduction the consumer stays 30 times longer in the sun before getting a sunburn
 - In this time the consumer receives 10 times more UVA than received w/o sunscreen

- “However, contrary to the expectations based on laboratory experiments, population-based case-control studies often found an increased risk of melanoma associated with sunscreen use...”¹
- “Three randomized trials showed that sunscreen use by sun sensitive subjects engaging in intentional sun exposure could increase the duration of exposure without decreasing sunburn occurrence. This increased duration could be the reason why melanoma risk is increased when sunscreen is used.”²

- The described prevalence of sunbed use in Europe and the described increase is not real
- The industry did whatever she could but why have the 2006 actions of the Commission not reached the majority of member states? It is the duty of the member states to IMPLEMENT and ENFORCE.
- It is unlikely that the small portion of indoor tanners need more protection than the big portion of outdoor tanners using sunscreens
- Let the consumer draw educated, but free decisions whether he or she uses a safe product or not

Contact details:

Christina Lorenz

MBA – Managing Director of KBL AG and

Chairperson of ESA (European Sunlight Association a.s.b.l.)

KBL AG

Ringstr. 24-26

D-56307 Dernbach

Germany

clorenz@kbl.de

www.kbl.de

+49 2689 9426 0