



Sunscreens

Appendix to UVR Protection Policy Statement

The Public Health Association of New Zealand supports mandatory regulation of sunscreens as an effective public health measure to address the high skin cancer rates in New Zealand. Government should mandate regulation of sunscreens sold in New Zealand as soon as possible.

Overview

Given that skin cancer is highly preventable by reducing harmful levels of UV radiation exposure, primary prevention is a key public health strategy for reducing the burden of skin cancer. Although applying sunscreen is only one part of a person's defence against UV radiation, to perform that part properly sunscreens must be effective. In New Zealand sunscreens are not regulated, unlike Australia where it is mandatory for all products sold to comply with the Australian and New Zealand Sunscreen Standard, AS/NZS 2604:2012, whereas only a voluntary code applies in NZ. However, the recently released New Zealand Cancer Action Plan 2019-2029 proposes "considering regulating primary sunscreens as a therapeutic product".

At the moment though a product sold in New Zealand can still make claims that have not been confirmed by a standardised and validated testing process.

In a country which shares with Australia by far the highest age standardised melanoma skin cancer rates in the world ⁽¹⁾ and very high keratinocyte cancer (non-melanoma skin cancer) risk ⁽²⁾ it is essential that there is mandatory regulation of sunscreens. Pharmacists and other sunscreen retailers should be able to have confidence in the products they are selling and consumers must be able to have confidence that the products they are using on themselves and their children perform in accordance with the claims on the labels. Therefore the PHA calls on the Government to require all sunscreen products sold in New Zealand to comply with the standard. All batches should be tested to ensure that they meet label claims and each new formulation of a product should be tested, particularly when active ingredients are changed.

This is also the policy of the NZ Cancer Society, Melnet, NZ Dermatological Organisation plus other medical organisations and Consumer NZ.

Special Interest Group or Policy Sponsor Bronwen McNoe and Tony Reeder	
Date ratified by AGM	Date to be reviewed

The PHA will endeavour to work with other partners, including pharmacists, to help advance these objectives.

Priorities

The Public Health Association recommends that central government:

1. Mandate regulation of all sunscreens sold in New Zealand

PHA actions to support this policy

The Public Health Association, including its branches, will:

1. Advocate for mandatory regulation of sunscreens in collaboration with other likeminded agencies.

References

1. Olsen CM, Green AC, Pandeya N, Whiteman DC. Trends in Melanoma Incidence Rates in Eight Susceptible Populations through 2015. *J Invest Dermatol*. 2019.
2. Sneyd MJ, Gray A. Expected non-melanoma skin (keratinocytic) cancer incidence in New Zealand for 2018. Wellington; 2018.