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TSA Response to Skin Cancer UK's Call For Further Sunbed Legislation

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In response to Skin Cancer UK's call for further sunbed legislation, Gary Lipman, Chairman of The Sunbed Association (TSA) said:

"If only UV exposure from the sunshine was as well-regulated as professional sunbed use, we would see far less incidence levels of burning and it is burning that increases the risk of melanoma, not responsible tanning.

"Professional sunbeds are already well regulated in the UK with legislation prohibiting use by under-18s, a British Standard dictates the maximum UV output of a sunbed as well as provides guidance on the maximum number of sessions allowed per year and that appropriate protective eyewear must be worn. There is also a British Standard for sunbed salon staff training and in many areas around the UK you are required to have a License issued by the local authority to operate a professional sunbed.

"In addition to this, members of The Sunbed Association operate to our Code of Practice requiring trained staff to screen customers to ensure they have no contra-indications to tanning. This means only those people able to tan have access to sunbeds. Trained staff also provide customers with information and advice on responsible tanning, tanning sessions are recorded and customers enjoy their tanning experience without the risk of over-exposure and burning. This certainly doesn't happen when sunbathing on the beach.

"We would always recommend using a sunbed in one of our member salons, details of which can be found on our website: sunbedassociation.org.uk "

Skin Cancer UK Claims

The statistics repeatedly rolled out by the anti-sunbed lobby have been regularly refuted by The Sunbed Association as inaccurate, outdated and often disingenuous. Let us address each one made in the current Skin Cancer UK campaign:

Claim: Using a sunbed increases the risk of melanoma

This claim is almost exclusively based on the findings of an IARC Report, the agency which advises the World Health Organisation (WHO).

This report from 2006 was an analysis of existing survey based (epidemiology) studies not clinical studies.

Half the respondents had used a sunbed at home or in a dermatology clinic. When you remove these respondents the alleged percentage becomes just 6% - this is the WHO's own data and this was before current UV output Regulations were in place.

The relative risk data presented in the IARC report is:

40% relative increased risk for melanoma for home units

96% relative increased risk for medical units

6% relative increased risk for professional salon sunbeds

This means a medical use of a sunbed is 16 TIMES - 1,600% - greater as a relative risk compared to commercial sunbeds.

PLUS importantly if you remove Skin Type 1s from the same data, very-fair skinned people who are screened and refused use in professional tanning salons – then the IARC report data shows any increased risk of melanoma from professional sunbed use is removed.

PLUS the risk factor here is 'relative risk' not 'actual risk'. As an example there is a relative or potential

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risk of being in a car accident if you drive a car. It is not an actual or definite risk that it will happen.

Claim: Sunbeds kill approximately 100 people each year in the UK

This claim relates to Professor Brian Diffey's report (published in British Journal of Dermatology in 2003 149:578-581). It was quantitative research based on assumptions only. There was NO evidence of actual fatalities.

"Of the 3-4 million Brits who use a sunbed, this analysis has suggested that possibly 100 or so might die as a result each year."

Claim: There are 46 new cases of melanoma diagnosed each day in the UK

There is no empirical research that demonstrates a causal link between responsible sunbed use and melanoma.

Claim: Sunbeds emit up to 15x more UVA than the sun and some machines can emit levels of UV radiation up to five times stronger than the midday Australian summer sun.

British Standard 60335-2-27 requires that the UV output of a professional sunbed is 0.3W/m2. This is equivalent minute for minute as the UV level of the Mediterranean summer sun. The average sunbed session is 12 minutes.

Claim: Sunbeds are already banned in Australia, Brazil and Iran

Salon use of sunbeds is banned in Australia but home use of sunbeds is not. As such, sunbeds can be used without any controls relating to who uses the sunbed and for how long. This has led to an underground and uncontrolled use of sunbeds.

Claim: The World Health Organisation (WHO) declared that sunbeds are as dangerous as smoking and placed their use into the highest risk level for cancer alongside cigarettes, alcohol and asbestos.

Sunbeds were put into 'Group 1' of carcinogens in 2009 when the WHO reviewed its list of known carcinogens. The panel concluded that since sunlight had long been included (since 1982), sunbeds should also be included on the list. No new science was conducted.

Group 1 means there is evidence that the use of sunbeds can increase the risk of skin cancer. It does not mean anything about the **size** of the risk just that there is **any** risk at all, ie some things in Group 1 are very dangerous, like arsenic and mustard gas. Other substances only carry a very small risk, like red wine, beer, HRT, salted fish, the contraceptive pill – all in the same Group 1 category as sunbeds.

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