

Comments on Preliminary Opinion on Biological effects of ultraviolet radiation relevant the health with particular reference to sunbeams for cosmetics purposes.

Missing comments and research on results on the implementation of the SCCP rules from 2007 til now in the Netherlands.

Name: H.J. van Heest
Country: The Netherlands
Organization: Samenwerking Verantwoord Zonnen (SVZ)
E-mail adres: huib.vanheest@jk-nederland.nl
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Comment(s) / Question(s)

Dear SCENIHR and Scientific Committee,

From the Dutch Sunbed association we want to asked you all the question:

Despite all the measurements took by the Dutch Market Surveillance (VWA), the Dutch Sunbed Association (SVZ) and later on by European Commission (ProSafe) and the industry (ESA) to harmonize the market, regarding the demands of the SCCP report in 2006. We (SVZ) see nothing noted, or the work of ESA/JAS recognized in the SCENIHR draft opinion

Although you are referring to this subject in the preliminary opinion in by point 3, Terms of reference, several times. See line 10, 17,2 and 24,3.

For your connivance we placed your tekst here below.

3. TERMS OF REFERENCE

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3 In view of new medical evidence and the development of science and technology over
4 the past decade, including the Scientific Justification which underpins The European Code
5 against Cancer and in particular the recommendation on UV radiation, the SCENHIR is
6 asked to reassess the safety risks associated with the use of sunbeds and to provide an
7 answer to the following questions:

8

9 1. Does new scientific and medical evidence (collected over the past decade) have a
10 significant impact on the conclusion of the previous SCCP Opinion of 2006
11 {sccp_o_031b.pdf} with regard to the general health and safety implications
12 relating to the exposure of people to UV radiation (UVR)? If yes, what are the key
13 elements to be considered and how is the health of users of tanning devices for
14 cosmetic purposes (sunbeds) likely to be affected (both positively e.g., Vitamin D
15 regulation and negatively, e.g., skin and ocular melanoma).

16

17 2. Does SCENIHR uphold the assessment of the SCCP that the limit value of the
18 Erythemally-weighted irradiance of 0.3 W/m² (equivalent to an UV index of 12)
19 ensures sufficient levels of protection for the health and safety of users? If this is
20 not the case, please specify if it is sufficient to give specific information. If it is
21 not sufficient to provide information, please specify the limit values above which
22 adverse health effects can occur.

23

24 3. What should be the wavelength range for which the total Erythemally-weighted
25 irradiance should be negligible (e.g. under 0.003 W/ m²) to minimise the risks of
26 developing skin cancer due to the use of sunbeds?

Also you are referring to this subject in the preliminary opinion in by point 5.3, Terms of reference, several times. See line 4, 5, 6, 7 and 8.

For your connivance we placed your tekst here below.

However, legislation of sunbed use is not yet harmonised within the EU. Not all Member
4 States follow the Opinion of the European Scientific Committee on Consumer Products
5 recommending a limitation of UVR intensity of sunbeds to 300 mW/m² ; in many
6 countries unstaffed machines are not banned nor do all countries require
7 declaration/registration of the tanning facilities. Importantly, not all Member States
8 restrict sunbed access to those over 18 years of age

Summary:

**As mentioned before, we have a important question: What were (are) the effects of
all measures taking by the industry and market surveillance according SCCP
demands?**

SCENIHR, can you give us your comments on this please?