

- Danish National Board of Health (Sundhedsstyrelsen)
- Finnish Radiation and Nuclear Safety Authority (Säteilyturvakeskus, STUK)
 - Icelandic Radiation Protection Institute (Geislavarnir Ríkisins)
 - Norwegian Radiation Protection Authority (Statens strålevern)
- Swedish Radiation Protection Authority (Statens strålskyddsinstitut)

Response of the Nordic radiation protection and health authorities on the “Preliminary Opinion on Biological effects of ultraviolet radiation relevant to health with particular reference to sun beds for cosmetic purposes” of the EU’s Scientific Committee on Consumer Products (SCCP).

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Please be informed of the enclosed document “UV-Radiation of Sun beds – Common public health advice from Nordic radiation protection and health authorities” of February 28, 2005 from the health- and radiation protection authorities of respective ministry of the five Nordic countries Denmark, Finland, Iceland, Norway and Sweden.

The Nordic authorities advise in general against the use of sun beds for tanning. Young persons (below 18 years) and UV-sensitive people (skin type I-II) are strongly advised not to use sun beds. Specific advice, if sun beds are used, is the necessity to keep the annual UV-dose low. Furthermore, the erythemally effective irradiance of a sun bed for tanning must not exceed the irradiance of the tropical sun and the spectral

distribution of the radiation should not differ too much from that of the sun.

The basic and internationally accepted principle in the field of radiation protection is that any practice involving radiation must be justified, i.e. do more good than harm. We agree with the Overall Conclusion of the SCCP preliminary opinion document that the use of sunbeds is likely to increase the risk of malignant melanoma particularly in the case of young people and people with known risk factors for skin cancer. This conclusion raises serious questions on the justification of the cosmetic use of sunbeds and therefore it should be mentioned also in the beginning of the document.

UV irradiance levels higher than the tropical sun from artificial tanning devices are not, under any circumstances from a Nordic perspective, justified for the purpose of quick cosmetic tanning and will increase the risk of skin damage particularly among the light skinned UV-sensitive people as a consequence of small errors or misjudgments of human or technical origin.

Spectral characteristics, dosages and power levels of sun bed products vary significantly. As the relative importance of short and long UVR wavelengths for melanoma skin cancer is still unknown, it is necessary to retain a mandatory UV-type classification system using short and long wave UV bands as in the present standard EN60335-2-27 and to label tanning appliances accordingly to inform of their different spectral and UV-power levels. So far the UV-types have worked well to meet conflicting interests of the industry and of national health authorities. Possibly a future categorization system needs a higher degree of flexibility to meet both varying new authority demands and industry interests of a uniform standard that offers different options with specified requirements.

The prospect of EC-based recommendations for sun beds holds a lot of potential, but also certain risks. People in different countries of Europe live under different natural solar conditions and have acquired different susceptibilities to ultraviolet radiation. A European uniform recommendation or harmonized standard may give many benefits, but it should consider the differences of the countries, the susceptibility of their populations and their regulations on artificial sun tanning. Therefore it is important that any recommendations from the EC allow a fair amount of local adaptation of criteria. The Nordic countries, especially Norway, Finland, Iceland and Sweden, have fairly powerful legal tools for regulating sun beds. We are concerned that European harmonization may lead to more lenient regulation and advice than have been adopted in the Nordic countries at the present and that the health risk for our population will increase.

Enclosures:

Nordic sunbed position document: “UV-Radiation of Sun beds – Common public health advice from Nordic radiation protection and health authorities”.

Comments (in detail, technical) on the SCCP’s Preliminary Opinion by UV-experts of the Nordic authorities.