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SUBMISSION on New Zealand Skin Cancer Primary Prevention and Early Detection Strategy

1. Introduction

Thank you for the opportunity to make a submission on the New Zealand Skin Cancer Primary Prevention and Early Detection Strategy (the Strategy). This submission is from Consumer NZ, an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa. Consumer NZ provides fair, impartial and comprehensive consumer information and advice.

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2. General comments on the Strategy

In general, we support the Strategy. In particular, we are very pleased the Strategy recommends sunscreens are regulated as a therapeutic product and that solariums are banned for commercial purposes. We have been calling for this for many years so are extremely supportive of these recommendations.

We support the full set of recommendations, however, will focus our submission on the areas Consumer NZ has conducted research and testing on such as solariums, sunscreens, and other sun protection products.

3. Specific comments on the key messages document

Page 4 Skin cancer protection

- There is inconsistency in the key messages with regards to sunscreen use. The “How to protect your skin” section states “Slop on a sunscreen that is ideally SPF50, broad-spectrum and water resistant.” On page 5, the sunscreen recommends SPF50+. We recommend this inconsistency is remedied.
- Sunglasses section: Clarification is required about the advice to always check the label from the sun protection rating. Is this referring to the lens category? If so, it should be clarified.

4. Specific comments on the Supplementary information document

6.4 Public education campaigns

Knowledge gaps – page 34

The Supplementary information document states there is very limited routine monitoring of sun protection behaviours on which to base a campaign evaluation. The document also states there is no recent New Zealand data on awareness of the UVI.

In November 2023, Consumer NZ published its second SunSmart survey (original survey conducted in 2021). The survey was a nationally representative survey of 1000 New Zealanders aged 18 years and older, carried out online in August 2023. The survey included questions about sun safety (including use of the UVI), buying sunscreen, using sunscreen and attitudes towards sunscreen. The results from the survey can be viewed at <https://consumer.org.nz/articles/sun-smart-survey-how-new-zealanders-protect-themselves-from-the-sun>

6.5 Sun protection products and guidelines

Regulatory environment – page 35

The Supplementary information document outlines several sun protection product standards. In the past two years, Consumer NZ has tested sunglasses, sun protective clothing and sun shelters. The test results have been accompanied by a Buying Guide for each product.

Further information can be found at consumer.org.nz

[Sunglasses | Compare - Consumer NZ](#)

[Sun-protection clothing | Compare - Consumer NZ](#)

[Sun shelters | Compare - Consumer NZ](#)

Policy, practices and recent research – page 36

As noted above, Consumer NZ has published more recent research than the research shared by Cosmetics NZ conducted by the Suncare Initiative Group in 2021.

The results from the survey can be viewed at <https://consumer.org.nz/articles/sun-smart-survey-how-new-zealanders-protect-themselves-from-the-sun>

Key organisational recommendations – page 37

Sunscreens being included as a therapeutic product to ensure quality standards of being fit for purpose.

Consumer NZ fully supports the recommendation that sunscreens are included as a therapeutic product.

Consumer has been campaigning for sunscreens to be regulated as a therapeutic product for many years – a call backed by the New Zealand Dermatological Society the Cancer Society, and Melanoma New Zealand.

Consumers also agree, with 57% of people in our 2023 Sun Smart Survey wanting sunscreens regulated as a therapeutic product (19% were unsure).

Excessive UV radiation is a major risk factor for skin cancer, and sunscreen reduces this exposure, so it provides a therapeutic purpose.

Although better sunscreen safeguards for consumers were introduced when the Sunscreen (Product Safety Standard) Act (the Sunscreen Act) became law in 2022, they weren't sufficient.

The Sunscreen Act requires sunscreens to comply with the Australian and New Zealand sunscreen standard. However, the standard doesn't specify how often a sunscreen should be tested. Our investigations have found some companies are relying on test reports that are several years old.

The Standard's scope also isn't comprehensive. It covers insect repellents labelled with an SPF of 4 or more, and skincare products that claim to be SPF 15 or higher, including moisturisers, oils, creams and gels. However, it falls short when it comes to lip products, or products whose main use is as a tinted moisturiser or foundation. We believe these products should meet the substantiation requirements of the standard, and we think consumers would expect the same.

Regulating sunscreens as therapeutic products would be an opportunity to address these exclusions and implement testing requirements.

The use of UPF-rated clothing and sun protective hats as a prevention strategy – page 38.

Consumer NZ fully supports the recommendation that UPF-rated clothing and sun protective hats be used as a prevention strategy.

In addition, we'd like the recommendation to endorse that the most current version of the Australian Sun Protective Clothing Standard AS4399:2000 be mandatory in New Zealand.

In Consumer NZ's 2023 test of sun protection clothing, we found a bikini making a sun protection claim when it didn't meet the skin coverage requirements of the standard. Two of the 19 products making UPF claims we tested, did not meet their claims. Full results of the test can be found here [Sun-protection clothing | Compare - Consumer NZ](#).

6.6 Solaria

Policies, practices and recent research in New Zealand – page 40

The Supplementary information document refers to Consumer NZ's 2022 mystery shopper survey of sunbed operators. A more recent survey has been published in July 2024. The full report can be found here [Time to ban sunbeds - Consumer NZ](#).

The summary of our survey on page 40 can be amended as follows:

Health NZ contracts Consumer NZ to conduct regular mystery shopper surveys of sunbed operators to determine whether they are complying with the voluntary sunbed standard and sunbed requirements of the Health Act, which restricts sunbed use to people 18 years and older.

In the most recent survey in 2024, one operator allowed a 14-year-old to have a sunbed on two separate occasions at two different locations (in Palmerston North and Whanganui). Six operators (four in Auckland and two in Wellington) let a person with type-1 skin (fair skin, which burns easily or never tans) have a sunbed. Three of these operators were repeat offenders.

Key organisational recommendations – page 40

Consumer NZ fully supports the recommendation that commercial artificial tanning devices be banned. Consumers also support our call. In a 2023 Consumer NZ survey, only 17% of respondents did not support a ban, while 47% supported a ban and 36% were unsure.

Please add our name to the list of organisations that support this recommendation.

Thank you for the opportunity to provide comment. Please get in touch if you require further information.

ENDS