

AUCKLAND  
DERMATOLOGY

*Mr. Bevan*

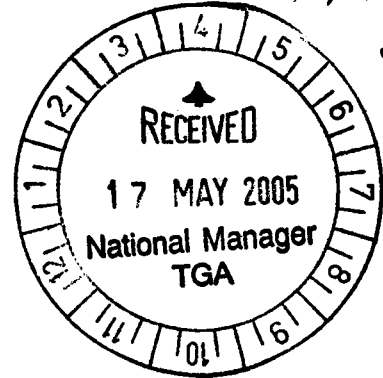
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7 May 2005

Mr Terry Slater  
National Manager  
TGA  
P O Box 100  
Woden  
ACT 2606 ... AUSTRALIA



Dear Mr Slater

**Re: Review of Regulation of Sunscreen Products**

I apologise for the slight delay in forwarding my submission, however I have only just become aware of the potential change to deregulate secondary sunscreens with an SPF of no more than 20.

I write as the President of the New Zealand Dermatology Society with the full support of our Society to object to this proposed change.

Australia and New Zealand have the highest non-melanomatous and melanomatous skin cancer incidence in the world. Sunscreen protection is vital. Their use has been one of the focuses of patient education to prevent acute sunburns and help reduce the incidence of skin cancer in the long term. These strategies have been in large part successful.

We believe the TGA should continue to require all sunscreen products to be registered to ensure continuation of quality and compliance of the products with the appropriate test methods, stability testing and GMP. The SPF number on products is a claim of their efficacy. Consumers need to remain confident that they will benefit from their purchase of sunscreens and the product will perform to expectation.

We would see it as a detrimental step if all sunscreens were not regulated as currently. Your proposal has the potential to compromise public health and reverse all the hard work that has been put into developing the awareness and benefits sunscreens can provide.

We already have wide-ranging concerns regarding the claims many cosmeceuticals make. We would view it as a backward step to revert to unregistered labelling of sunscreens with the attendant implicit buyer beware message. It is imperative the consumer has confidence that the SPF rating on their purchase will provide them the sun protection factor claimed.

Kind regards

**Dr Nicholas BIRCHALL**  
President New Zealand Dermatology Society  
#1PM

NZDS/ProReg/Sun

**NICHOLAS M BIRCHALL**  
MB CHB FRACP

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