



"Philip Bekhor"
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To: <cosmetic_review@nicnas.gov.au>
cc:
Subject: Sunscreen Labeling ATTN Mr Terry Slater

Mr Terry Slater

National Manager

TGA

Dear Mr Slater

Re Australian Review of Policy Framework for Regulating Products at the Cosmetic/Therapeutic Interface Specifically Sunscreen Products.

I am a dermatologist in private and hospital practice and am adamantly opposed to deregulation of secondary sunscreens of 20SPF or less.

The daily use of sunscreens is important for:-

- Prevention and management of skin diseases such as:-
 - Rosacea
 - Systemic and Discoid Lupus
 - Photosensitivity disorders in general
- Skin Cancer Prevention
- Prevention of skin aging.

Patient compliance with the daily application of a facial sunscreen is always difficult to achieve. It is for this reason that sunscreens in daily use cosmetics such as moisturizers and makeup is so useful. In general primary sunscreens are designed for outdoor use and are not convenient to use on a daily basis.

The cosmetic industry is notorious for misrepresentation in their marketing and I would have no confidence in their labeling unless they were listed on the Australian Register of Therapeutic Goods to ensure compliance with appropriate test method, quality standards, stability and the Australian standard.

Any product making a claim for sun protect must continue to be under the control of the TGA.

Yours Sincerely

Philip Bekhor MB BS FACD

Director Laser Unit

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1