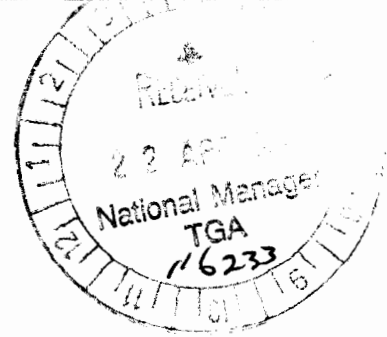


**Dr. Jenny Byth**  
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Diseases of the Skin

20 April, 2005



Mr Terry Slater  
National Manager  
TGA  
PO Box 100  
Woden, ACT 2606

*Mr. Casari  
For reply pls  
22/4/05*

Dear Mr Slater,

*TS  
22/4/05*  
Re: Australian review of policy framework for regulating products at the cosmetic - therapeutic interface, specifically sunscreen products.

*I strongly oppose the deregulation of secondary sunscreens with an SPF of 20 or less. In Australia in general, and in Queensland in particular, there is enormous ongoing morbidity and significant mortality due to skin cancer. I do not believe that we can expect a significant reduction in the rate of this public health problem in the near future. Sunscreens have been shown to contribute to the prevention of skin cancers and so the quality and reliability of these products is of great importance.*

*The SPF claimed for a product is dependent upon careful application of a specific amount of sunscreen, and so labels must include instructions regarding appropriate application. The SPF depends on quality manufacturing methods, stable formulations, and accurate expiry dates. SPF test data and UVA efficacy data should be available for each product.*

*Currently, doctors can advise their patients that the careful use of a sunscreen containing product will have a given benefit for them. It will not be possible to give this advice if the product standards are allowed to slip. Claims made by many unregulated products are already confusing for consumers. I believe that we should maintain tight regulation of sunscreen containing products for the benefit of the Australian population.*

Yours sincerely,

Jenny Byth  
Dermatologist

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