



St George Hospital Campus

A/Prof Dédée F Murrell MA(Cambridge),BMBCh(Oxford),FAAD(USA)
Head of Department of Dermatology, St George Hospital
Conjoint Associate Professor, University of New South Wales

ACADEMIC OFFICE
Department of Dermatology
St George Hospital
Gray Street
Kogarah, Sydney
NSW 2217
Australia
Ph: (61-2) 9350-2543
Fax: (61-2) 9350-2906
E: D.Murrell@unsw.edu.au

DERMATOLOGY PRACTICE
Private Consulting Rooms
Research & Education Centre
Level 2, 4-10 South Street
Kogarah, Sydney
NSW 2217
Australia
Ph: (61-2) 9350-2088
Fax: (61-2) 9350-2886
murrell.patients@ori.org.au

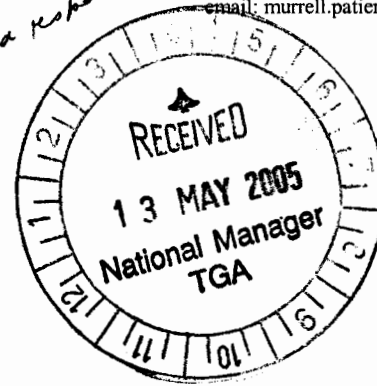
All correspondence to
Private Consulting Rooms
Research & Education Centre
Level 2, 4 South Street
KOGARAH NSW 2217
Ph: (02) 9350 2088
Fax: (02) 0350 2886
email: murrell.patients@ori.org.au

DM/ak

6 May 2005

Mr Terry Slater
National Manager
Therapeutic Good Administration
PO Box 100
WODEN ACT

*Mr Slater
cc Mr Bobbald ✓
Dr Stavara Kogarah*



Dear Mr Slater,

Re: Australian Review of Policy Framework for Regulating Products, Including Sunscreens.

I understand that recently there has been a proposal to deregulate sunscreens with an SPF of 20 or less. I think that this is a dangerous step to take because consumers, when purchasing a sunscreen product, believe that the SPF written on the label represents a standardised test that will protect their skin to a certain degree. At the present time, Australia has the best testing system in the world for sunscreens, and also the highest level of skin cancer in the world. I am on a skin cancer advisory board of the American Academy of Dermatology and despite this being the leading dermatology organisation in the world, they wish the American authorities had as strict guidelines as currently exist in Australia regarding the regulation of SPF claims.

It is likely that, if companies are no longer required to stick to standardised testing methods, they will be able to produce sunscreens which are lacking in efficacy at a very cheap price which will be appealing to the consumer who naively assumes that the SPF written on the bottle conforms to stringent testing requirements. Those reputable companies that do follow the guidelines and go through TGA requirements because the SPF is higher than 20 will therefore be at a financial disadvantage. The end result of this is that the Australian market place will be flooded with sunscreen products of an inadequate quality. It is also possible that people who get recurrent sunburn as a result of this, and down the track melanomas, might take it upon themselves/class action to sue the TGA if they discover that they have been using sunscreens with inadequate protection as a result of the change in your policy. I would strongly urge the TGA to keep its very good policy on sunscreens, and even to consider increasing the stringency of its policy to include immune protection factors as a further requirement for measuring

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the efficacy of sunscreens. This is definitely one product that should not be just considered merely a cosmetic!

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Murrell'. The signature is fluid and cursive, with the first letter 'D' being particularly large and stylized.

A/Dédée F Murrell MA (Cantab) BMBCh (Oxon) FAAD (USA)
Senior Staff Specialist in Dermatology, St George Hospital
Conjoint Associate Professor, University of New South Wales