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✓ Mr Cesarin  
cc Ms Bobbels

NEW ZEALAND DERMATOLOGICAL SOCIETY

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175 Grey St  
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Mr Terry Slater  
National Manager  
TGA  
PO Box 100  
Wooden  
ACT 2606

4 May 2005



Dear Mr. Slater

**Re: Australian Review of Policy Framework for Regulating Products at The Cosmetic / Therapeutic Interface Specifically Sunscreen Products**

We, the New Zealand Dermatological Society Incorporated (NZDSI), strongly oppose any possible deregulation of secondary sunscreens with a SPF less than 20.

We and the New Zealand Cancer Society have spent years educating the public on the need to protect skin from the sun's ultraviolet rays including the benefit of regular sunscreen application. The public are now aware that "SPF" is important to see but need detailed information on product application frequency, listed ingredients (so that those who have allergies to certain sunscreen components or cream excipients can avoid or confidently apply different products) and have confidence with the appropriate SPF rating.

Quality sunscreen production is highly scientific and dependent on quality manufacturing methods, formulation stability, quality hygiene practices and regular tests, surveillance and objective grading so that the medical profession, pharmacists and the public can confidently depend on the quality and appropriate sunscreen shelf-life. Many of the products we receive in New Zealand are manufactured in Australia or influenced by the TGA.

We would be most concerned if any product labelled or advertised for sun protection or SPF was outside the control of the Australian Register of Therapeutic Goods.

Yours sincerely

Dr. L Reiche  
Honorary Secretary for New Zealand Dermatological Society Incorporated

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