



# Queensland Cancer Fund

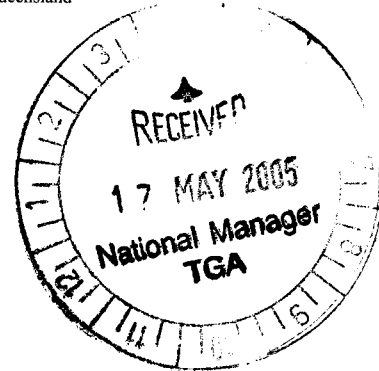
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A member of The Cancer Council Australia.  
Patron: Her Excellency Ms Quentin Bryce, AC Governor of Queensland

12 May 2005

Mr Terry Slater  
Therapeutic Goods Administration  
PO Box 100  
Woden, ACT 2606



Dear Mr Slater

## **RE: AUSTRALIAN REVIEW OF POLICY FRAMEWORK FOR REGULATING PRODUCTS AT THE INTERFACE BETWEEN COSMETICS AND THERAPEUTIC GOODS**

The Queensland Cancer Fund supports The Cancer Council Australia's response regarding the regulation of moisturisers containing sunscreen with an SPF less than 20.

The Queensland Cancer Fund strongly opposes the suggestion to deregulate secondary sunscreens with an SPF less than 20.

We believe that the deregulation of moisturisers containing sunscreen with an SPF less than 20 could result in misuse of the SPF claim, consumer confusion and potentially negative health outcomes.

Consumers see all products with an SPF as providing an important therapeutic benefit. Moisturisers that specify the level of SPF make a therapeutic claim that the product provides a certain level of sun protection. If these products are not regulated this could result in consumer confusion and lack of confidence in sunscreens.

Skin cancer awareness campaigns have promoted the use of sunscreens with at least an SPF of 15 but preferably SPF 30+ as this provides the greatest protection from UV radiation. Therefore, any product that specifies an SPF up to 20 gives a public perception that it provides very good protection from UV radiation however this may not be the case due to differences in use and application.

Moisturisers are used 'sparingly' whereas sunscreens are used 'liberally', therefore if a moisturiser that specifies an SPF level is used sparingly, it may not deliver a guarantee on that level of sun protection. In addition to this, the average time for sunburn to occur in Australia with no sun protection strategies in place is 11 minutes. By deregulating moisturisers that contain sunscreen, this may lead to detrimental health outcomes.

The SPF number applies to the degree of protection from the UVB range of UV radiation. The SPF is obtained by measurement at a specific application rate (usually 2mg/cm<sup>2</sup>). SPF is also dependant on quality manufacturing methods, stability of the formulation and use

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[Signature]

*Research*

For more information on cancer prevention, early detection, treatment and support services,  
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*Treatment*

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Offices at Cairns, Townsville, Rockhampton, Toowoomba, Sunshine Coast and Gold Coast

*Education*

before a proven expiry date. Moisturisers should not be permitted to carry an SPF level, unless they go through the current TGA approved testing procedures.

We hope that you take our comments into consideration and that any attempt to deregulate moisturisers that contain sunscreen with SPF less than 20 be abandoned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Greenbank', written in a cursive style.

**SUSAN GREENBANK**  
Manager Prevention and Early Detection Unit