

## Comments on relevant sections:

**X1. Introduction:** Note that both Australia and New Zealand now have the highest skin cancer rates in the world.

### X.4.1 page 9 First paragraph

Cancer Council Victoria (CCV) questions the value of therapeutic sunscreen products, which are 'listable', being permitted to carry the coded indications (as documented on page 9).

The SunSmart program (CCV) recommends that when the ultraviolet (UV) radiation index is three and above that a combination of **all five sun protection measures** including:

1. Slip on some sun-protective clothing – that covers as much skin as possible.
2. Slop on SPF30+ sunscreen – make sure it is broad spectrum and water resistant. Put it on 20 minutes before you go outdoors and reapply every two hours. Sunscreen should never be used to extend the time you spend in the sun.
3. Slap on a hat – that protects your face, head, neck and ears.
4. Seek shade.
5. Slide on some sunglasses – make sure they meet Australian Standards.

An unintended effect of including the coded indications could be that it will increase the general public's perception of the role and importance of sunscreens in the prevention of skin cancers. This could be to the detriment of people understanding that the use of a combination of all five measures is crucial. This could be particularly risky given that research indicates that:

- No sunscreen provides full protection so it shouldn't be solely relied on.
- Most people do not apply enough sunscreen. The average-sized adult should apply more than half a teaspoon of sunscreen (about 3 ml) to each arm and the face/neck (including ears), and just over one teaspoon (6 ml) to each leg, the front of the body and the back of the body. That is, 35 ml of sunscreen for one full body application.
- Most people forget to re-apply sunscreens every two hours, or more often, when sweating.

### X.4.2 page 11

#### Directions for use of the product

CCV recommends that stronger instruction is required in the labelling directions of the product. We recommend that this includes that *Sunscreen should be reapplied at least every two hours.*

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