

MEMORANDUM

TO:

FROM:

DATE:

SUBJECT:

Issue:

Ultraviolet radiation (UVR) is internationally recognized as being carcinogenic, and the adverse health effects associated with sun exposure such as skin cancers, skin ageing and eye damage are well documented. There is no evidence to suggest that any type of artificial tanning equipment is less harmful than natural sun exposure, and in 1994, the World Health Organization issued a scientific review that stated there are adverse health effects associated with sun bed use. The U.S. Department of Health and Human Services has designated tanning equipment as carcinogenic. At the present time in Canada, there is no comprehensive legislation governing the operation of artificial tanning equipment.

Background:

a) Health Effects of Ultraviolet Radiation and Artificial Tanning

Skin cancer is the most common form of cancer in Ontario, accounts for one-third of all new cancer diagnoses and costs Canadian taxpayers millions of dollars in health care costs each year. Melanoma, the most serious type of skin cancer, is increasing significantly in incidence. In the 1970s, 5 cases per 100,000 population were diagnosed in Ontario; by 2000, that rate had increased to 13 cases per 100,000 population. It is the second most common form of cancer in people in Ontario between the ages of 15-34. There is strong evidence that exposure from artificial tanning equipment increases the risk of melanoma, especially when exposure is started during childhood and adolescence. A 2005 review of the scientific literature found a 25% increased risk of developing malignant melanoma among those who had used artificial tanning equipment compared to those who never used the equipment.

b) Health Claims for Artificial Tanning

Tans are promoted in the media and by the fashion industry as a sign of health and well being. Arguments for the use of artificial tanning for health reasons, however, are weak. The use of artificial tanning equipment for medical treatment such as psoriasis is its only indication and should be undertaken only with medical supervision. Further, artificial tanning is not needed for Vitamin D production. For the majority of people, incidental exposure to the sun and dietary intake of Vitamin D is sufficient to provide enough Vitamin D for health benefits. Finally, the argument to acquire a base tan prior to travelling south is fallacious; such exposure will only provide protection equivalent to sunscreen with an SPF of 2-3, not enough to prevent skin damage and itself potentially damaging.

c) Use of Artificial Tanning by Youth

National Sun Survey 2008 reported that 27% of Canadian women aged 16 to 24 use tanning equipment. In October 2006, a poll commissioned by the Canadian Cancer Society (CCS), Ontario Division, showed that 11.4% of Grade 11 and 12 girls use artificial tanning equipment and that approximately 32,00 females and 18,000 males in Grades 7 to 12 in Ontario have used artificial tanning equipment.

d) Increase of Artificial Tanning Facilities

According to the International Tanning Association, the artificial tanning industry is worth \$5 billion a year in the United States. Tanning services are not registered and as a result, there is no accurate count of these facilities. The presence of tanning equipment is widespread and growing and can be found in health and fitness clubs, condominium fitness centres, beauty salons and spas.

e) Regulation of Artificial Tanning

In February 2005, the federal Radiation Emitting Devices (RED) Act was amended, and set new technical and labelling requirements for tanning equipment. The RED Act covers only manufacturers' point-of sale and marketing practices and not tanning equipment operation, which is the key to safe use.

In 2005, Health Canada revised the "Guidelines for Tanning Salon Owners, Operators and Users". These guidelines outline the risks of tanning, provide safety information, and summarize the key requirements of the RED Act. Adherence to these guidelines is voluntary, however, and at this time, there is no co-ordinated effort to disseminate, train, certify or enforce the guidelines. On October 7, 2008 the Canadian Cancer Society, Ontario division released a study that showed artificial tanning facilities in Toronto were not following Health Canada's voluntary safety guidelines, including those related to the protection of under-aged youth and the identification of individuals at greater risk of developing skin cancer.

On May 28, 2008, Bill 83, a private members bill entitled "An Act to help prevent skin cancer" passed second reading but is presently still in committee.

Nationally and internationally, regulations vary considerably. New Brunswick restricts use to those aged 18 and over. France, with the most comprehensive legislation, requires UVR emitting appliances to be declared to health authorities, prohibits youth under 18 years from using tanning equipment, requires commercial establishments to have trained personnel supervising, limits amount of UVB in UV output of tanning equipment and forbids any claim of health benefit from UVR.

In March 2005, the World Health Organization released fact sheet No 287 and presented a strong case for effective regulations governing sun bed use and recommended that government health authorities develop public health policies regarding the use of indoor tanning equipment. They stated that highest priority need be given to restrictions of use by persons under 18 years as well as banning unsupervised trained personnel.

Canadian Cancer Society (CCS) Call to Action

In 2007 the Canadian Cancer Society, Ontario Division called on the Government of Ontario to:

- Enact legislation that will ban access to tanning equipment for children under 18 years of age.
- Develop and maintain a registry of artificial tanning equipment in use in Ontario.
- Prohibit the marketing of artificial tanning targeting youth, such as advertising in school yearbooks.

The Canadian Cancer Society, Ontario Division further recommended that:

- All staff operating artificial tanning equipment receive training on operation procedures, maintenance, and how to identify people at greater risk of developing skin cancer, particularly those people who are unable to tan.
- Signage stating the health risks of artificial tanning be posted in clear view of each tanning bed.

Rationale for Regulation of Artificial Tanning

The results of this recent CCS study clearly show that self-regulation and the provision of voluntary guidelines are not working. To protect the health of Ontarians, in particular youth who are most susceptible to the damaging effects of UV radiation and who are often targeted by the industry to use their product, regulation is essential. The Mandatory Health Programs and Services Guidelines require that boards of health work with local groups and individuals to provide education and promote policies which reduce the risk of skin cancers. By supporting comprehensive legislation to regulate artificial tanning industry, these requirements can be achieved.

Recommendation

THAT support the Canadian Cancer Society's (Ontario Division) call for government action and join other professional bodies across Ontario such as the Canadian Dermatology Association and Cancer Care Ontario to encourage the development of strong and comprehensive legislation that will protect the public from the harmful effects of artificial tanning; and

THAT write to the Honourable Margaret Best, expressing their support for these measures and his stand on this issue; and

THAT this recommendation be forwarded to local members of provincial parliament, the Association of Local Public Health Agencies and other Ontario Boards of Health.