

25 October 2012

Secretariat
Radiation Control Regulation 2012
Hazardous Materials, Chemicals and Radiation Section
Hazardous Incidents and Environmental Health Branch
NSW Environment Protection Authority
PO Box A290
Sydney South NSW 1232

By email: radiation@epa.nsw.gov.au

Dear NSW Environment Protection Authority

Cancer Society of New Zealand, Proposed Radiation Control Regulation 2012

Thank you for the opportunity to comment on your proposed new Radiation Control Regulation 2012. The Cancer Society of New Zealand wishes to congratulate the NSW Government on your courageous decision to ban the commercial use of solarium in NSW, effective 31 December 2014. This is a very important public health initiative and is a measured response to the robust evidence that solarium are not only dangerous but unnecessary, giving operators two years to exit from this sector.

The Society has used your initiative as part of our discussions with our Government to take a similar stance, or at a minimum regulate our unregulated solarium industry.

We note the key points from the Regulatory Impact Statement (RIS) which include:

- Solarium are estimated to be responsible for approximately 120 melanomas per year and these would be avoided if solarium use were banned in NSW, including an average of 10.45 fatal cases.
- The value of the benefits of banning solarium are estimated at \$46.1 million over five years in avoided health costs to the community.
- It currently costs the solarium industry around \$16.5 million to comply with current regulation (eg staff training undertaking skin type assessments, and supervision of clients). Under a total ban, this is a saving to the industry.



We also note that the RIS findings are consistent with the recently published findings of the International Prevention Research Institute of France and the European Institute of Oncology (Boniol et al <http://www.bmj.com/content/345/bmj.e4757>) who concluded that 'the risk of skin cancer from any sunbed use at 20% which rose to 87% if exposure was before 35 years of age. The authors also noted that melanoma and other skin cancers associated with sunbed use can be prevented by avoiding exposure to indoor tanning devices.

Yours sincerely



Dr Jan Pearson
DEPUTY CHIEF EXECUTIVE