

# Therapeutic Products Consultation: Submitter Profile

If you elect not to use the online tool to complete your submission, please ensure you complete the following submitter profile form and send in via email with your submission.

- Individual       Organisation

**Name (of individual or organisation):** The Cancer Society of New Zealand, Inc.

**Email address:** [Click here to enter text.](#)

## Profile (tick all that apply)

### Perspective

- Consumer       Disabled person       Māori       Pacific peoples
- Other [Click here to enter text.](#)

### Industry

- Industry body  
 Advertising  
 Retailer (non-pharmacy)

#### **Importer**

- Medical devices  
 Medicines  
 Cells and tissues  
 Active ingredients  
 Veterinary medicines

#### **Manufacturer**

- Medical devices  
 Medicines  
 Cells and tissues  
 Active ingredients  
 Veterinary medicines

#### **Wholesaler**

- Medical devices  
 Medicines

### Health sector

- Professional body (eg, Colleges, Pharmaceutical Society etc)  
 Health service provider (eg, Ambulance, Māori or Pacific health provider etc)  
 Private hospital  
 Pharmacy organisation  
 District Health Board (DHB) - please state which service area: [Click here to enter text.](#)

#### **Health practitioner**

- Pharmacist       Surgeon  
 Nurse       Optometrist  
 Midwife       Dietician  
 Dentist       Medical practitioner (excluding Surgeons)
- Other health practitioner (please comment) [Click here to enter text.](#)

### Clinical trials

- Medicines (other than cell and tissue)
- Medical devices
- Cells and tissues
- Trial ethics

### Other

- Government agency
- Crown entity
- NGOs
- Veterinarian
- Other (please comment) [Click here to enter text.](#)

## **Official Information Act statement**

Your submission may be requested under the Official Information Act 1982. If this happens, the Ministry will normally release your submission to the person who asks for it. If you consider there are good reasons to withhold it, please clearly indicate these in your submission.

### **Therapeutic Products Regulatory Scheme consultation**

Prepared by The Cancer Society of New Zealand, Inc.

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### **Introduction**

The Cancer Society of New Zealand (CSNZ) is a non-profit organisation that is committed to reducing the incidence and impact of cancer in the community and reducing cancer inequities. We work across the cancer continuum with a focus on prevention, supportive care, provision of information and resources, and funding of research.

Thank you for the opportunity to comment on the Therapeutic Products Bill. The Cancer Society would like to comment on: sunscreen.

### **Key Recommendations**

1. That **Primary sunscreens** (products used primarily for protection from UV radiation, SPF 4 or more) and moisturisers containing sunscreen with SPF greater than 15 are regulated as **therapeutic goods**.
2. That sunscreens classified as therapeutic goods must comply with the Australian and New Zealand Sunscreen Standard *AS/NZS 2604 Sunscreen products-Evaluation and classification*.

### **Specific Comments**

Skin cancer is the most common cancer in New Zealand (NZ), and NZ has the highest rate of melanoma in the world<sup>1</sup>. Sunscreens are an important component of a sun protection regime.

Sunscreens contain substances that either absorb or reflect the sun's UV rays and prevent most of it from penetrating the skin and damaging skin cells.

The Cancer Society of New Zealand recommends that sunscreen is specifically listed as a therapeutic product in the Therapeutic Products Regulatory Scheme following a similar process as in Australia. Currently, sunscreens are unregulated in New Zealand whereas in Australia the *Australian and NZ Sunscreen Standard (AS/NZS 2604:2012)* is mandatory. Consumer NZ tests sunscreen each year, and each year test results are variable<sup>2</sup>. Many New Zealanders use sunscreen every day of their lives, sometimes over large areas of their body surface. Therefore, it is important that sunscreens are safe, effective, and of good quality. Following a process similar to Australia would ensure that companies test products regularly in certified laboratories, and provide evidence they meet minimum standards.

The Cancer Society recommends that evidence-based sun protection practices are printed on therapeutic sunscreen labels. We recommend a SPF 30 (or higher) broad spectrum, water-resistant sunscreen as part of a combination of sun protection measures including clothing, broad brimmed hat, shade and sunglasses. We also recommend that children under the age of one are kept out of direct sun. Given the impact of skin cancer on the New Zealand population, it is important to increase consumer awareness of skin cancer and avoid consumers being misled by inappropriate claims.

The Cancer Society recommends only permitting sunscreen products with an SPF rating of 30 or higher to indicate that they can prevent skin cancer. It enables consumers to make an informed choice to protect themselves from skin cancer when purchasing sunscreens.

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<sup>1</sup> Health Promotion Agency. Accessed: <https://www.hpa.org.nz/programme/skin-cancer-prevention>

<sup>2</sup> Consumer NZ. Accessed: <https://www.consumer.org.nz/articles/sunscreens>