BMA Scotland Briefing:
Sunbeds – the need for a national licensing scheme
May 2008

Key messages:
• There has been an increase in incidence of malignant melanoma of 45.5% in men and 20% in women between 1994 and 2004.
• On average, about 20 years of life are lost for each melanoma death in the UK.
• It is estimated that each year there are 100 malignant melanoma deaths in the UK.
• Sunbed users are 2.5 times more likely to develop skin cancer.
• Scotland has more than 800 tanning salons, with 120 in Glasgow alone. Of those, 19 are un-staffed and the industry is unregulated.
• The BMA supports the introduction of a national statutory sunbed licensing scheme in Scotland.

Introduction
The current Public Health etc (Scotland) Bill includes proposals to regulate sunbeds in Scotland. Amendments currently before the Health & Sport Committee of the Scottish Parliament seek to:

• Ban children aged under 18 from using, hiring or purchasing sunbeds
• End the operation of un-staffed tanning salons
• Create a duty to provide information to sunbed users
• Create a duty to display information

If implemented, these measures should go some way towards ending children’s exposure to the health risks associated with sunbed use and to educate adults who choose to use sunbeds of the risks they are exposing themselves to. It is the view of the BMA that a licensing scheme would ensure the effectiveness of each of these measures and would reflect the seriousness of the health risks associated with the use of sunbeds for cosmetic purposes.

The BMA therefore urges MSPs to consider introducing a national statutory sunbed licensing scheme in Scotland.

Background
The popularity of tanned skin has increased throughout the 20th century and is perceived by many as attractive and a sign of health. This has resulted in increased personal exposure to ultraviolet radiation (UVR), mainly attributable to increased recreational exposure.

The popularity of tanned skin has been accompanied by widespread use of artificial sources of UVR, such as sunbeds. These contain fluorescent tubes that emit UVR for the purpose of tanning the skin. There is no evidence to suggest that any type of sunbed is less harmful than natural sun exposure. The debate on the use of sunbeds has been part of a much wider discussion about the need to reduce unnecessary exposure to UVR.
The scale of the problem
There has been a marked increase in skin cancer in white populations over recent decades. The incidence of melanoma has doubled in the United Kingdom over the past 20 years and in 1998, the fastest growing incidence of cancers in men in the UK was of malignant melanoma and non-melanoma skin cancers, especially in people that sunburn easily and tan poorly. In the age-group 20 – 39 years, malignant melanoma is the second most common cancer in the UK. This is an unusually young age distribution for an adult cancer and emphasises the importance of its prevention and early treatment to avert the potential loss of many years of life. On average, about 20 years of life are lost for each melanoma death in the UK.

Figures for Scotland have shown an increase in incidence of malignant melanoma of 45.5% in men and 20% in women between 1994 and 2004 and it is predicted that incidence will nearly double by 2020. Historically, higher rates of melanoma incidence have been reported in Scotland than in the rest of the UK.

The World Health Organisation (WHO) has predicted a large increase in skin cancers in the future due to UVR and some studies have indicated a possible link between the use of sunbeds and the increased risk of melanoma.

The International Agency for Research on Cancer (IARC) recently concluded that there is convincing evidence to support a causal relationship between sunbed use and skin cancer, particularly with exposure before the age of 35 years.

The medical profession has become increasingly concerned over the use of commercial sunbeds which can lead to a wide range of skin diseases. It has been estimated that sunbeds cause 100 deaths from melanomas every year in the UK.

Health risks of sunbeds
Ultraviolet rays from sunbeds have been classified by IARC as Group 2A carcinogens that are “probably causing cancer in humans.” Recent studies in different countries over the last ten years have shown that the use of sunbeds increases the risk of cancer and the risk appears to be higher if use begins in early life. Our own research found that sunbed users were 2.5 times more likely to develop skin cancer. The risks appear to be higher in the young.

In 2005, the WHO recommended that no-one under 18 should use a sunbed and that there is a need for guidelines or legislation to reduce the risks associated with sunbed use. WHO argues that the growth in sunbed use, combined with the desire and fashion to have a tan, are considered to be the main reasons behind the fast growth in skin cancers in developed countries. The highest rates are found predominantly in those countries where people are fairest-skinned and where the sun tanning culture is strongest. Scots are particularly fair-skinned and therefore at relatively high risk of developing skin cancer.

A 2003 REHIS survey of 794 cosmetic sunbed premises in all 32 Scottish local authority areas identified a number of un-staffed and unsupervised premises and salons that were failing to check the age of customers or enquire about skin type or medical conditions. Furthermore a study of privately operated premises in Dundee, conducted by the University of Dundee and Perth and Kinross Council, revealed the following major incidences of poor practice:

- 89% exercised no administrative control of the number of sessions per customer
- 81% failed to give adequate advice to customers
- 59% maintained no customer records
• 33% displayed no guidance to users.

**BMA policy on the use of sunbeds**

The BMA does not recommend the use of tanning devices for cosmetic purposes because of the potential risk to health associated with their use. UV treatment should only be given under the supervision of a dermatologist. When used in this way, accurate dose administration and monitoring helps reduce the side effects of UV radiation, such as:

- Developing certain types of skin cancer – the risks appear to be greatest for the young, with the chances of developing a tumour increasing by up to 20% per decade of sunbed use before the age of 56.
- Premature ageing – people tend to use sunbeds to look better but they could end up with leathery, wrinkled and sagging skin.
- Damage to eyes - the eyes (in particular the cornea) are very prone to damage from tanning equipment – it is recommended that sunbed users wear protective goggles, but research shows that people may not use them even if they are provided.
- The immune system – increasing evidence shows that sunbeds have an immunosuppressive effect.

The BMA urges the Government to regulate the use of sunbeds for non-therapeutic purposes.

A health risk warning and information leaflet should be compulsory wherever sunbeds are sold or hired.

Sunbed users should be screened to ensure that they are not taking any medication that would induce photosensitivity reactions or suffer from abnormal sensitivity to ultraviolet and/or visible radiation.

There should be certified training for personnel on a renewable basis so that they can be updated on new research and regulation in this area.

There should be high profile campaigns, similar to the initiatives already being undertaken by Cancer Research UK, that endeavour to change the perception of tanned skin as a sign of health and attractiveness. This should be particularly targeted at the 16-24 year old age group with the emphasis that tanning causes wrinkles and premature ageing of the skin that no amount of creams can eradicate.

**Current regulation of sunbeds**

Scotland has more than 800 tanning salons, with 120 in Glasgow alone. Of those, 19 are un-staffed and the industry is unregulated.

Sunbed premises and machines are subject to the requirements of health and safety legislation in Scotland. Control of exposure is governed by the general provisions of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulation 1999.

The Health and Safety Executive has issued guidelines to control the risks from the use of sunbeds. This guidance is voluntary.

Two studies conducted jointly with Environmental Health found that sunbed parlours were falling far short of the mark in achieving safety guidelines, with four out of five sunbeds emitting UV levels that exceed the maximum British Standard. It is clear that the Health and Safety Executive’s guidance for quality of care provided in sunbed parlours is not being followed and is therefore ineffective.
Some businesses operate under a voluntary code of conduct agreed by the Sunbed Association; however only around one in five sunbed premises are members of the Association therefore their voluntary code only has a limited effect.

A number of local authorities have already (under existing powers) introduced licensing and inspection in some areas of Scotland. In some cases these are more rigorous than those being proposed by the Public Health etc (Scotland) Bill. **A national statutory licensing scheme would provide a uniform approach and end the ‘postcode’ approach that currently exists.**

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   Northern Ireland: Northern Ireland Cancer Registry
   Prevalence was estimated using data from EUROPREVAL study.
15. Watson D Children to be banned from sunbed salons. Daily Record; 11 April 2008