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Europe's Beating Cancer Plan: Shedding a light on sunbeds and skin cancer

The Association of European Cancer Leagues (ECL), the European Society of Skin Cancer Prevention (EUROSKIN), and the European Academy of Dermatology and Venereology (EADV), warmly welcome **Europe's Beating Cancer Plan** and are delighted with the high priority given to primary prevention and health promotion within the Plan.

In particular, we give special praise for the foreseen, concrete *“measures [to reduce] exposure to ultraviolet radiation, including from sunbeds, which increases the risk of skin cancer, especially malignant melanoma, the most serious form of skin cancer”*.

With this joint statement, ECL, EUROSKIN and EADV outline some **shared concerns regarding the safety of EU citizens and adverse health effects associated with sunbed use**, as well as **call for the phasing out of sunbeds as consumer products for non-medical purposes**.

We emphasize a number of aspects that national competent authorities together with the EU institutions should take into consideration going forward and during the implementation of the Plan:

1. The rapid rise in the incidence of skin cancer

- **Melanoma and non-melanoma skin cancers are the most prevalent cancers in most European countries.** Every year, 150.627 melanoma and 356.180 non-melanocytic cancers are diagnosed* in Europe, and around 27.000 European citizens lose their lives to the disease [1,2]. Skin cancers' incidence has been increasing over the past decades, despite being amongst the most preventable cancers, as they are mainly caused by ultraviolet (UV) radiation.
- In addition to the natural UV from the sun, **there is strong evidence that sunbed exposure causes skin melanoma, squamous cell carcinoma** and, to a lesser extent, **basal cell carcinoma, at all ages and especially when the first exposure takes place in younger ages**. Indeed, the use of sunbeds and their UV-irradiation significantly increase the risk of skin cancer, especially if such use starts before the age of 35 (~59% increase in melanoma risk). [3,4]

2. The mounting evidence that UV radiation from sunbeds can damage DNA and cause skin cancers

- The European Commission's Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) concluded that **sunbed UV radiation of sunbeds is a “complete carcinogen”**, as it acts both as an initiator and a promoter. [5]
- Sunbed UV radiation is classified by the International Agency for Research on Cancer (IARC) as a **Group 1 “carcinogenic to humans”**. [6]
- Because there are no indications for threshold levels of UV-irradiance and -dose, it is **not possible to set a safe limit for UV-irradiance from sunbeds**.
- The only conceivable beneficial effect of UV radiation (UVB) from sunbeds (vitamin D synthesis) is outweighed by the adverse health effects (such as skin cancer, eye cancer, cataract, immune suppression etc.). Additionally, **there is no need to use sunbeds for vitamin D synthesis**, as sufficient amounts can be produced and stored after moderate sun exposure or with supplements in a much safer way.

* Note: these are conservative estimates due to insufficient registration



3. The current standardization is inadequate

- Given the fact that the **European standard EN 60335-2-27**, harmonized under the Low Voltage Directive (LVD) (2014/35/EU), does not consider the **latest science and evidence-based knowledge**.
- Given the fact that **the fixed value for the total erythema UV-irradiance of 0.3 W/m²** (based on the European standard EN 60335-2-27, harmonized under the LVD **is based on the outdated 2006** Scientific Committee on Consumer Products (SCPP)'s **opinion**. [7])
- Given the fact that the **standard for sunbeds**, harmonized under the LVD, **has to provide a high level of health protection for EU citizens**, the **false impression is given that sunbeds are not harmful to users' health**.

We, therefore, have to conclude that **sunbeds are inherently unsafe. There is no 'responsible' way to use a carcinogenic agent and there is no safe irradiance (dose) limit below which UV from sunbeds is safe for users** and does not lead to an increased risk of skin cancers. [5]

Sunbeds are mostly regulated at the EU level in the framework of the LVD, which **does not serve the public health impact of these devices**. Considering the enormous negative impact of sunbed radiation on EU citizens' health and safety, **sunbeds must not be regulated as consumer products**. UV-emitting devices should only be used for the treatment of certain diseases under medical supervision after an individual risk-benefit assessment by a trained physician.

Therefore, **we call for sunbeds becoming a competence of the European Commission's Directorate-General for Health and Food Safety (DG SANTE) as the most relevant DG for products linked to carcinogenic agents**.

The EU institutions and EU Member States play and will play a pivotal role in the successful implementation of [Europe's Beating Cancer Plan](#) in the coming years. Hence, **we call on all national governments to ensure that the implementation of the Plan meets the needs identified by the European cancer community by raising the issue of sunbeds during the Subgroup on Cancer set up within the Steering Group on Health Promotion, Disease Prevention and Management of NCDs**.

We would also welcome the opportunity to discuss further our perspective and elaborate clear objectives for protecting the health of citizens in Europe.

Signatories:

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About the European Society of Skin Cancer Prevention (EUROSKIN)

EUROSKIN is an independent non-profit making scientific society, whose principal aims are to reduce the incidence and mortality of skin cancer. It sets out to achieve this through the promotion and co-ordination of collaborative actions between European professionals active in the fields of primary and/or secondary prevention. These include, for example, dermatologists, epidemiologists, biologists, physicists and other professionals with an interest in these aims



About the Association of European Cancer Leagues (ECL)

ECL is a non-profit organisation that unites, supports and represents cancer leagues across the WHO European region. Established in 1980 by prominent NGOs and experts, and based in Brussels (Belgium), ECL provides a voice and forum for cancer leagues to collaborate and share knowledge, primarily in the areas of cancer prevention, tobacco control, access to medicines and patient support, and create opportunities to advocate for these issues at the EU level and beyond.



About the European Academy of Dermatology and Venereology (EADV)

EADV is the leading community to further the knowledge of health professionals and advocates in the field of dermatology and venereology. We are dedicated to advancing patient care, education and research by providing a unique platform to bring people together and share ideas.

References

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