



25 May 2021

Our ref: BB21-170

Committee Secretariat  
Health Committee  
Parliament Buildings  
WELLINGTON

via email: [he@parliament.govt.nz](mailto:he@parliament.govt.nz)

Tēnā koutou katoa,

### **Sunscreen (Product Safety Standard) Bill**

Thank you for giving The Royal New Zealand College of General Practitioners the opportunity to comment on the Sunscreen (Product Safety Standard) Bill.

The Royal New Zealand College of General Practitioners is the largest medical college in New Zealand. Our membership of 5,500 general practitioners comprises almost 40 percent of New Zealand's specialist medical workforce. Our kaupapa is to set and maintain education and quality standards for general practice, and to support our members to provide competent and equitable patient care.

### **Submission**

We note that The Bill would require the Minister of Commerce and Consumer Affairs to recommend that a mandatory regulation be set to prescribe a product safety standard for sunscreen products.

We note that New Zealand and Australia have a shared Sunscreen Standard, which specifies testing methods for sunscreens, as well as labelling requirements. However, compliance with the standard is currently voluntary in New Zealand.

We note that the regulation would be set under section 29 of the Fair Trading Act 1986. The Minister would need to recommend the regulation no later than six months after the legislation commenced.

#### Preventing skin cancer

Sunscreens have a role in preventing the skin cancer caused by ultraviolet radiation (UVR). New Zealand has relatively high rates of UVR, and high rates of both melanotic and non-melanotic skin cancers.

#### Current and future regulation

Currently, sunscreens are a cosmetic and are regulated under the Hazardous Substances and New Organisms Act 1996, under its Cosmetics Products Group Standard. This standard is set by the Environmental Protection Authority to manage risks associated with the product or its ingredients.

The New Zealand 2019-2029 Cancer Action Plan recommends that sunscreens be regulated as a therapeutic product and notes that they fall within the definition of a 'therapeutic product' in the draft Therapeutic Products Bill.<sup>1</sup>

---

<sup>1</sup> <https://www.health.govt.nz/publication/new-zealand-cancer-action-plan-2019-2029> Accessed 25/3/21

It may be some time until the new regulatory scheme is operational however, and the College supports this Bill which in the interim would enable consumers to have confidence in the effectiveness of the sunscreens they purchase. Testing by Consumer New Zealand has demonstrated that this is not currently the case as recently they found that seven out of 12 sunscreens tested didn't provide their claimed SPF protection.<sup>2</sup>

#### Conclusion

The College supports the Sunscreen (Product Safety Standard) Bill. We are not seeking to make an oral presentation to the Committee.

We hope you find our submission helpful. If you have any questions, or would like more information, please email us at [policy@rnzcgp.org.nz](mailto:policy@rnzcgp.org.nz)

Nāku noa, nā



Dr Bryan Betty  
MBChB, FRNZCGP, FACRRM  
Medical Director | Mātanga Hauora

---

<sup>2</sup> <https://www.consumer.org.nz/articles/sunscreens/know-the-issue> Accessed 25/5/21