



URBAN PUBLIC HEALTH NETWORK
RÉSEAU CANADIEN POUR LA SANTÉ URBAINE

June 28, 2016

Environmental and Radiation Health Sciences Directorate
8th Floor, 269 Laurier Avenue West, AL. 4908D
OTTAWA ON K1A 0K9 Canada
Tanning_bronzage@hc-sc.gc.ca

Dear Sir or Madame:

Re: Consultation - Tanning Guidelines

The UPHN is a national organization established in 2004 which today includes the Medical Officers of Health in 21 of Canada's large urban centres. Working collaboratively and with a collective voice, the network addresses public health issues that are common to urban populations. Our organization has reviewed your draft guidelines and have a number of suggestions on how this document can address the health challenges posed by this Class 1 carcinogen. The additions to your recommendations are as follows:

That prior to the attendance at commercial tanning establishment, it be required:

- That it should not be the responsibility of to the business operators of these commercial operators or their lay staff to make critical and medically complex decisions, decisions that could have a profound impact on the health of individuals attending these businesses.
- That medically trained healthcare providers be the only individuals making this important assessment.
- That the individuals be assessed by and discuss the risks of artificial tanning with their healthcare provider.
- That the assessment should be equivalent to that received by individuals receiving UV exposure for medically indicated therapeutic reasons. Consumers of this product are exposing themselves to a Class 1 carcinogen, in the same category as tobacco smoking.
- That among the different matters that need to be covered would include having the healthcare provider advise the client as to their skin type and should they be a skin type 1, burn easily and/or never tan should not, on medical advice, never use tanning equipment.
- That the healthcare provider should review the history of sunburns and skin cancer, history of skin infections, rashes or other skin conditions.
- That health care providers review the medical history for underlying diseases which would also preclude a patient attending a commercial tanning business.
- That health care providers conduct a thorough medication review with their patient as part of this medical assessment of prescribed, over the counter and alternative medicine products containing pharmacologically active ingredients that are photosensitizing. Individuals will need to be advised of potential adverse events, and where appropriate patients are advised against using artificial tanning or sun exposure until any course of medication is complete or they stop taking self-administered agents. Consultation with a pharmacist may be helpful.

Should a client indicate intention to use of indoor tanning equipment after this assessment:

- That prospective users of a commercial tanning business be required to produce a health care provider's note showing that a thorough consultation has taken place. Monitoring of risk must be ongoing and the health care provider's note be renewed every three years.
- That tanning businesses require proof of a health care provider assessment before providing service and a record of this note is kept on file at the business.
- That should clients be advised by the operator should they experience an adverse reaction to UV exposure such as a severe reaction arising from the UV exposure, burns to the body, or problems with vision they should contact their healthcare provider immediately.
- That individuals electing to use this equipment should also be advised that these reactions can occur not only shortly after the use of the equipment but that these adverse reactions including severe ones can occur up to thirty-six hours after an exposure in commercial tanning equipment.
- That healthcare providers and operators caution patients/clients intending to use artificial tanning that they need to space substantial sun exposures or tanning by at least twenty-four hours.
- That tanning facility operators as part of their record keeping have available the exposure schedule calculated for each client on the basis of skin type and UV generating equipment. The schedule must not exceed IEC 60335.2.27 Ed. 5.1 2012-11. Offers of 'unlimited tanning' must be bound to the aforementioned schedule.
- That individuals working in this industry should not be required to 'sport a tan'.

With respect to labelling:

Health Canada must deal with this class 1 carcinogen.

- That it be required that prominent and graphic health warnings be placed on the outside of tanning beds, as is done with the outside packaging of cigarettes containing tobacco. This action would complement the suggested requirement of making these guidelines available for potential clients. Examples of mandatory labels on tanning beds, borrowing from the work of Health Canada on cigarette warnings, are included.

Thank you for the opportunity to provide comment on these draft guidelines.

In Health.

Yours sincerely,



Cordell Neudorf, B.Sc., M.D., M.H.Sc., FRCPC
President, Urban Public Health Network

WARNING

**UV RADIATION
SUPPRESSES
THE IMMUNE
SYSTEM**

Ultraviolet radiation can
suppress the immune system,
resulting cold sores



WARNING

**UV RADIATION
CAUSES WRINKLES**

Ultraviolet Radiation damages skin
collagen and causes wrinkles
with prolonged exposure



WARNING

**UV RADIATION
CAUSES MELANOMA**

Ultraviolet Radiation can result in
several forms of skin cancer,
including one of the most severe
forms of cancer, melanoma



WARNING

**UV RADIATION
CAUSES SCARS**

The removal of skin cancers
caused by ultraviolet radiation
can result in skin scarring



WARNING

**UV RADIATION
CAUSES OCCULAR
MELANOMA**

Without proper eye protection,
Ultraviolet radiation can
cause ocular melanoma and
cataracts