

12 February 2016

Sally Gilbert
Manager Environmental and Border Health
Ministry of Health
PO Box 5013
Wellington 6145

Sent by email: sunbeds@moh.govt.nz

Dear Ms Gilbert,

Consultation on the Regulation of Solaria and Sunbed Hire Businesses

Attached as a separate document to this email please find the submission from the Melanoma Network of New Zealand Incorporated (MelNet) on the *Consultation Document: Reducing Harm from Commercial Sunbeds 2015*. MelNet is a network of over 750 health professionals with a commitment to reducing the incidence and impact of melanoma in New Zealand.

MelNet's position, as outlined below and in the attached, is based upon a unanimous decision of its membership at the Annual General Meeting on 6 November 2015 that sunbeds should be banned in New Zealand.

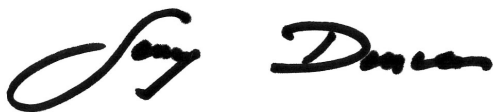
Key Recommendations

1. As stated in its submission, MelNet congratulates the Minister and Ministry of Health for recognising the need to protect consumers of all ages from the established dangers of sunbeds, particularly in light of their unequivocal link to melanoma.
2. Based upon evidence outlined in its submission, MelNet supports the following options:
 - Option 4: ban the provision of commercial sunbeds
 - Option 5: ban the importation, manufacture, sale and rental of sunbeds for commercial, and possibly private, use.
3. In MelNet's view a regulatory approach would be ineffective in addressing the risks associated with mandatory operating practices for sunbed premises and businesses that hire out sunbeds. As a result, these services should be banned, as should the sale of sunbeds to individuals, for example, as is currently possible through the Trade-me website.

4. If Government adopts the proposed regulatory approach, MelNet would view this decision as only an incremental step towards the ultimate goal of achieving Options 4 and 5.
5. If an interim regulatory approach is adopted, MelNet strongly recommends that the Government should:
 - Ensure that all New Zealanders are offered the same level of protection from harm currently provided in Auckland through the Council's 2013 Health and Hygiene Bylaw and Code of Practice;
 - Work closely with Auckland Council in developing regulation to ensure such level of protection is provided nationwide;
 - Ban self-service sunbeds because they allow access to sunbeds for individuals who may not fully understand their risk of harm.
6. As indicated in its 2015 submission to the Health Select Committee, MelNet also strongly urges the Government to introduce nation-wide regulation for other UV emitting devices with an associated risk of burn, such as the use of pulsed light and laser devices, due to associated high risks of harm to consumers. This issue remains of serious concern to MelNet.
7. Commercial operators of pulsed light and laser devices are currently required to be licensed under the Auckland Council Health and Hygiene Bylaw 2013 and comply with mandatory operational practices. Health practitioners operating in the practice of their profession are exempt. Comparable national-wide regulation should be implemented for these types of commercial services because of their risk of harm.

We would welcome an opportunity to discuss the submission with the Ministry of Health. We can be contacted via the MelNet Coordinator, Betsy Marshall, at melnet@melnet.org.nz.

Yours sincerely,



Gary Duncan, MBChB, FRACS
Consultant Plastic Surgeon
MelNet Executive Committee Chair



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General Practitioner
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Deputy Chair