

Our commitment to Responsible Indoor Tanning in the EU

1. We acknowledge the need to provide European customers with the highest possible level of safety

The European Sunlight Association (ESA) and its members stand for a safe, responsible and informed use of sunbeds in compliance with applicable legislation. We have always actively engaged with policy-makers to define and implement best practice in operating standards in sunbed services across Europe. We will continue to do so. We will also ensure our members undergo rigorous training and provide customers with the most comprehensive information and advice.

2. We believe in a safe, responsible and regulated use of sunbeds in line with existing EU legislation which provides state-of-the-art standards for sunbeds

Sunbed users must benefit from the highest safety, service quality and information standards, irrespective of the Member State in which they reside. Sunbeds in Europe are limited to $0,3W/m^2$, the strictest limit on UV irradiance in the world. The indoor tanning industry has already taken a number of measures to ensure swift implementation of existing regulation (both at EU and national level). We have adapted our products and communications according to the mandatory EN60335-2-27 technical standard. We are dedicated to ensure that manufacturers and tanning operators strictly follow the Standard's requirements, especially on lamps irradiance, age limit and warning messages.

When talking about safety, the use of the product matters as much as the product itself (this applies not only to indoor tanning). Our industry has also taken additional, self-driven initiatives to further control and reduce the risks associated with sunbed use. In cooperation with the Austrian Standards Institute (ASI) the ESA developed a new European Standard EN16489 on training and service provision recently adopted by CENELEC. This new standard guarantees that staff in tanning salons receives additional and consistent training and they must ensure that only those with appropriate skin types and without any contraindication are allowed to use sunbeds.

3. We believe that without proper enforcement of the rules, consumer safety and industry competitiveness will remain at risk

We are determined to move forward with the national implementation of the above standards in each of the Member States. However, the enforcement of mandatory standards and national law cannot just be the responsibility of the industry. Before even considering further measures the authorities have a duty to verify and enforce the existing rules and regulations. Today, our members face unfair competition due to the lack of systematic enforcement by the authorities. Equipment in conformity with the rules must be allowed to benefit from the EU's single market and *bona fide* operators, by far the majority, should not suffer restrictions rooted in non-compliance by a minority of the industry. Infringing practices must be sanctioned.

4. We are in favour of a more balanced debate on the risks and benefits of UV light and recognise the need for further research on the effects of UV radiation

Excessive exposure to UV radiation – whether from the sun or from a sunbed – can be detrimental. Sunbeds actually allow control of the UV exposure dose, while risky outdoor behaviour – e.g. the failure to use or improper use of sunscreens – may result in such excessive exposure. Available studies on sunbed use have so far not been able to exclude the effects of outdoor exposure, yet the blame for any negative effects is often purely apportioned to sunbeds. What we need is a fair and broad evaluation of risks and benefits of UV irradiation without demonising sunbeds per se in advance. More research is needed in that regard.

Our industry commitment

We, the voice of the European indoor tanning industry, pledge to:

- Maintain constructive dialogue with the EU and Member State national authorities on policy, standards, and implementation.
- Collaborate on safety standards across the value chain to ensure the highest possible level of customer safety.
- Systematically trigger an operator's exclusion from national and European professional associations if they fail to abide by the standards.
- Work towards wide scale implementation of the new European Standard on training & service provision and ensure informed advice to customers on sunbed use and exposure schedule.
- Continue to support and promote research on the effects of UV radiation.
- Invest in innovative and safe tanning solutions.

We ask the EU and Member State governments for:

- Effective, comprehensive and consistent market surveillance to verify compliance with existing legislation and standards, to complement the measures already taken by the industry.
- Acknowledgement of the initiatives taken by the industry and support for the implementation of the new European Standard on training & service provision, with a view to making it mandatory.
- A balanced approach to sunbed use, looking both at the risks and benefits of UV radiation, especially given a growing awareness of the risks associated with Vitamin D deficiency.