AMERICAN ACADEMY of DERMATOLOGY | ASSOCIATION

1445 New York Ave., NW, Suite 800
Washington, DC 20005-2134

MAIN: (202) 842-3555
FAX: (202) 842-4355
www.aad.org

HDS
Hawaii Dermatological Society

February 18, 2020

The Honorable Rosalyn H. Baker
Chair, Committee on Commerce, Consumer Protection, and Health Hawaii Senate
Conference Room 229, State Capitol
415 South Beretania Street
Honolulu, HI 96813

Dear Chairperson Baker:

On behalf of the Hawaii Dermatological Society (HDS) and the nearly 14,000 U.S. members of the American Academy of Dermatology Association (AADA), we write concerning SB 2778, legislation that would prohibit the sale and distribution in Hawaii of ultraviolet (UV) sun protection factor (SPF) sunscreen personal care products containing ingredients that are not classified as Category 1, generally recognized as safe and effective, by the U.S. Food and Drug Administration (FDA). As dermatologists, we dedicate our lives to promoting habits in our patients that ensure healthy skin. UV radiation damages the skin's DNA, which is the beginning stage of skin cancer. We urge you to strongly consider the broad implications of banning sunscreens containing certain ingredients, and bear in mind the dangers of sun exposure without adequate protection that the residents and visitors of Hawaii face.

UV light exposure is a risk factor for all types of skin cancer and sunscreen use is one photoprotection method to protect against it. UVA damages deeper layers of the skin and contributes to the development of melanoma, the deadliest form of skin cancer. UVB is the primary cause of sunburn and plays a key role in the development of skin cancer in the skin's more superficial layers. In addition, both types of rays can cause suppression of the immune system.[1] Unprotected sun exposure is the most preventable risk factor for skin cancer. According to current estimates, at least one in five Americans will develop skin cancer in their

[1] Lim HW, James WD, Rigel DS, Maloney ME, Spencer JM, Bhushan R. Adverse effects of ultraviolet radiation from the use of indoor tanning equipment: time to ban the tan. Journal of the American Academy of Dermatology. 2011 Apr 30;64(4):e51-60.

lifetime.[2,3] Melanoma, the deadliest form of skin cancer, is now the second most common form of cancer for females aged 15-29 years old, and Caucasian men over 50 years of age are at a higher risk of developing melanoma than the general population. [4,5,6] Over 500 new cases of melanoma are expected to be diagnosed in Hawaii in 2020.[7] Further, the annual cost of treating nonmelanoma skin cancer in the U.S. is estimated at $4.8 billion, while the average annual cost of treating melanoma is estimated at $3.3 billion.[8]

To help prevent skin cancer, the AADA recommends a comprehensive sun protection plan that includes seeking shade; wearing protective clothing, including hats and sunglasses; and generously applying a broad-spectrum, water-resistant sunscreen with an SPF of 30 or higher to exposed skin. Those who are concerned about the reported effects of chemical sunscreen ingredients can opt for a physical sunscreen containing the active ingredients zinc oxide or titanium dioxide.

Dermatologists have an interest in patient and public access to safe and effective sunscreen ingredients. The FDA is currently considering eight time-and-extent applications (TEAs) for new sunscreen ingredients to be added to the FDA over-the-counter (OTC) sunscreen monograph. This issue highlights the urgent need for new safe and effective ingredients to be introduced in the United States. With the approval of ingredients that utilize alternative UV filters available to sunscreen manufacturers, the public's health will be protected. The AADA will continue to take part in the discussion with the FDA and manufacturers regarding adding new ingredients to the monograph.

We are aware of and concerned about the potential environmental impact of UV-filters. However, the potential adverse effects, if any, related to absorption levels of all UV-filters in humans and wildlife is an emerging science. The latest studies conducted in Hawaii conclude that levels in the ocean and corals are at significantly lower levels than those reported to be toxic to coral reefs in laboratory settings.[9] The FDA, in its study on sunscreen absorption, concluded that "these findings do not indicate that individuals should refrain from the use of

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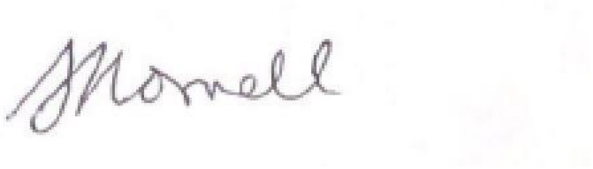
[2] Stern RS. Prevalence of a history of skin cancer in 2007: results of an incidence-based model. Arch Dermatol. 2010 Mar;146(3):279-82.
[3] Robinson JK. Sun Exposure, Sun Protection, and Vitamin D. JAMA 2005; 294: 1541-43.
[4] Siegel RL, Miller KD, Jemal A. Cancer statistics, 2017. CA Cancer J Clin. 2017; 67:7-30.
[5] Little EG, Eide MJ. Update on the current state of melanoma incidence. Dermatol Clin. 2012:30(3):355-61.
[6] NAACCR Fast Stats: An interactive quick tool for quick access to key NAACCR cancer statistics. North American Association of Central Cancer Registries. http://www.naaccr.org/. (Accessed on 3-10-2016).
[7] American Cancer Society. Cancer Facts and Figures 2020. https://www.cancer.org/content/dam/cancer-org/research/cancer-facts-and-statistics/annual-cancer-facts-and-figures/2020/cancer-facts-and-figures-2020.pdf

[8]Guy GP, Machlin S, Ekwueme DU, Yabroff KR. Prevalence and costs of skin cancer treatment in the US, 2002–2006 and 2007–2011. Am J Prev Med. 2015;48:183–7
[9] Mitchelmore CS, He K, Gonsior M, Hain E, Heyes A, Clark C, et al. Occurrence and distribution of UV-filters and other anthropogenic contaminants in coastal surface water, sediment, and coral tissue from Hawaii. Science of the Total Environment 670 (2019). 398-410

sunscreen."[10] Further investigation is required in order to understand how UV-filters affect the environment and human health. We encourage you to consider this before taking any action to remove a product that has been established to protect from skin cancer.

Please consider the public safety consequences of removing access or attaching stigma to sunscreens containing certain ingredients. We request that Hawaii give the FDA more time to add new sunscreens for public use. We appreciate the opportunity to provide written comments on this important public health issue. For further information, please contact Lisa Albany, director of state policy for the AADA, at LAlbany@aad.org or (202) 712-2615.
Sincerely,

George J. Hruza, MD, MBA, FAAD
President
American Academy of Dermatology Association



Sarah Howell, MD, FAAD
President
Hawaii Dermatological Society

[10] Matta, MK, Florian, J, Zusterzeel, R, Nageswara RP, Patel, V, Volpe, DAPhD, et al. Effect of Sunscreen Application on Plasma Concentration of Sunscreen Active Ingredients: A Randomized Clinical Trial. Journal of the American Medical Association 323, No. 3 (2020). 267.