



**American Cancer Society
Cancer Action Network**
825 Brook Street
I-91 Tech Center
Rocky Hill, CT. 06067
(203)-379-4850
www.acscan.org

**Public Health Committee
March 5, 2018
American Cancer Society Cancer Action Network**

Re: S.B. No. 219 (Raised) AN ACT CONCERNING INDOOR TANNING

The American Cancer Society Cancer Action Network (ACS CAN) strongly supports S.B. No. 219 (Raised) AN ACT CONCERNING INDOOR TANNING. ACS CAN is the nonprofit, nonpartisan advocacy affiliate of the American Cancer Society that supports evidence-based policy and legislative solutions designed to eliminate cancer as a major health problem.

ACS CAN supports legislative and regulatory initiatives at all levels of government to protect the public from increased skin cancer risk associated with exposure to UV radiation emitted by indoor tanning devices. Specifically, to protect youth from the harmful effects of artificial UV radiation, ACS CAN supports laws and regulations that prohibit access to tanning devices for individuals under 18, without exceptions.

Skin cancer is the most commonly diagnosed cancer in the United States.¹ Over 99,500 *invasive* skin cancers will be diagnosed in the U.S. in 2018, and more than 91,000 of these cases, including 970 in Connecticut, will be melanoma, the most serious form of skin cancer.² However, the actual number of the most common types – basal cell and squamous cell (i.e., keratinocyte carcinoma or KC), also referred to as nonmelanoma skin cancer – is difficult to estimate because cases are not required to be reported to cancer registries. The most recent study of KC occurrence estimated that in 2012, 5.4 million cases were diagnosed among 3.3 million people.³ In total, nearly 13,500 men and women are expected to die of skin cancer this year, and over 9,300 of those deaths will be from melanoma.⁴ Among young people aged 15-29 years melanoma is the fourth most commonly diagnosed cancer.⁵ Additionally, the cost of skin cancer is increasing, with over \$8 billion being spent on the disease each year - \$3.3 billion of which is for melanoma treatment.⁶

The most avoidable risk factor for skin cancer is exposure to ultraviolet (UV) radiation through outdoor exposure to sunlight or use of indoor tanning devices.⁷ Exposure to UV radiation can cause changes in the DNA of skin cells, which can lead to melanoma and other forms of skin and ocular cancers.⁸ Therefore, no tan is considered “safe.” In fact, each year, an estimated 400,000 skin cancer cases are attributed to indoor tanning in the United States, including 245,000 basal

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cell carcinomas, 168,000 squamous cell carcinomas, and 6,000 melanomas.⁹ Studies show using an indoor tanning device before the age of 35 increases the risk of melanoma by 59 percent, squamous cell carcinoma by 67 percent, and basal cell carcinoma by 29 percent.¹⁰ Similarly, squamous cell carcinoma and basal cell carcinoma are increased by 102 percent and 40 percent, respectively, when a tanning device is used before age 25.¹¹

Despite the risks and documented link, use of indoor tanning devices remains high among high school aged girls. In 2015, one in nine high school girls reported using an indoor tanning device in the past 12 months with rates increasing to one in six by their senior year.¹² Multiple studies have shown frequent use of indoor tanning among adolescents.^{13,14,15} Risk for melanoma increases with the number of total hours, sessions, and years that indoor tanning devices are used.^{16,17,18} Moreover, melanoma incidence rates are steadily increasing, largely among youth non-Hispanic white females, and, in part, due to indoor tanning.^{5,18,19}

Misinformation and deceptive practices from the indoor tanning industry and salons are partly to blame for such high tanning rates among high school girls, as evidenced by a 2012 congressional committee report and a 2010 Federal Trade Commission settlement with the Indoor Tanning Association.^{20,21}

The high rates of indoor tanning, and the associated harms, have increased awareness and action at all levels of government, from local to state and federal. In 2013 the General Assembly passed PA 13-79 which established a 16 and under ban on the use of indoor tanning devices. Currently, 17-year olds are not prohibited and do not need either a parent or Doctor's consent. The legislation passed (117-21 in the House and 36-0 in the Senate) and was signed by the Governor in June of 2013.

Since implementation, in 2014, the Surgeon General released a Call to Action on Skin Cancer calling for an increased effort to reduce exposure to UV radiation, especially through the use of indoor tanning devices.²² In May 2014, the United States Food and Drug Administration (FDA) reclassified tanning devices from a Class I to a Class II device.²³ As part of the additional restrictions, device manufactures have to include a visible black box warning stating that people younger than 18 years should not use the devices. In addition, one of the Healthy People 2020 objectives is to “reduce the proportion of adolescents in grades 9 through 12 who report using artificial sources of ultraviolet light for tanning.”²⁴

Finally, in December 2015, the FDA issued two proposed rules on indoor tanning devices to protect public health through prohibiting the use of tanning devices by minors, raising awareness of the health risks of these devices for adults, and requiring sunlamp manufacturers and tanning facilities to take additional safety measures for these devices. Unfortunately, no further action was taken to finalize these rules at the federal level, making it that much more important for state and local governments to address the public health risks of indoor tanning devices.

This sentiment is shared by organizations within the United States and in other parts of the world. Many U.S. organizations support laws that would prohibit the use of tanning devices by minors, including ACS CAN, the American Academy of Pediatrics, and the American Academy of Dermatology, among others. These laws have been shown to be effective. States that have age restrictions laws in place have lower teen tanning rates than states that do not have age restrictions.²⁵ There is also international movement to ban tanning devices. In 2009, the World Health Organization's (WHO) International Agency for Research on Cancer (IARC) categorizes tanning devices as its highest cancer risk category (Class 1) – "carcinogenic to humans."²⁶ Brazil, New South Wales, and Australia have completely banned indoor tanning, and Austria, Belgium, Finland, France, Germany, Iceland, Italy, Norway, Portugal, Spain, and the United Kingdom have restricted access to tanning for minors.

Because the science demonstrates that tanning devices cause cancer and that age restrictions can be effective at reducing teen tanning rates, ACS CAN strongly supports SB 219 to prohibit minors under the age of 18 from using indoor tanning devices, without any exceptions. To date, 13 states have passed similar comprehensive legislation prohibiting the use of tanning devices by minors, without exception, in order to protect their state's youth. Similar age restrictions on harmful substances and services have been placed on tobacco products and alcohol. Restricting access to indoor tanning device use based on age is no different. Given what is known about the harmful effects of UV radiation from indoor tanning devices, especially among youth, Connecticut should pass SB 219 prohibiting minors from using indoor tanning devices. Please feel free to contact me directly if I can provide any additional information or if you have any questions.

Bryte Johnson
Connecticut Government Relations Director
American Cancer Society Cancer Action Network

¹ American Cancer Society. *Cancer Facts & Figures 2018*. Atlanta, GA: American Cancer Society; 2018.

² American Cancer Society. *Cancer Facts & Figures 2018*. Atlanta, GA: American Cancer Society; 2018.

³ American Cancer Society. *Cancer Facts & Figures 2018*. Atlanta, GA: American Cancer Society; 2018.

⁴ American Cancer Society. *Cancer Facts & Figures 2018*. Atlanta, GA: American Cancer Society; 2018.

⁵ NAACCR Fast Stats: An interactive tool for quick access to key NAACCR cancer statistics. North American Association of Central Cancer Registries. <http://www.naacr.org/>. (Accessed on 5-23-2016).

⁶ Guy GP Jr, Machlin SR, Ekwueme DU, Yabroff R. Prevalence and costs of skin cancer treatment in the U.S., 2002-2006 and 2007-2011. *Am J Prev Med*. 2015; 48(2): 183-187. doi:10.1016/j.amepre.2014.08.036.

⁷ 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. *J Am Acad Dermatol*. 2011; 64:893-902.

⁸ American Cancer Society. *Melanoma of the Skin*. Atlanta: American Cancer Society; 2013.

⁹ Wehner MR, Chren MM, Nameth D, Choudhry A, Gaskins M, Nead KT, Boscardin WJ, Linos E. International prevalence of indoor tanning: a systematic review and meta-analysis. *Journal of the American Medical Association Dermatology*. 2014;150(4):390-400

¹⁰ Boniol B, Autier P, Boyle P, Gandini S. Cutaneous melanoma attributable to sunbed use: systematic review and meta-analysis. *British Medical Journal*. 2012; 345:e4757. Correction published December 2012; 345:e8503

¹¹ Wehner MR, Shive ML, Chren MM, Han J, Qureshi AA, Linos E. Indoor tanning and non-melanoma skin cancer: systematic review and meta-analysis. *BMJ*. 2012; 345:35909. doi: 10.1136/bmj.e5909.

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- ¹² Centers for Disease Control and Prevention (CDC). Youth Risk Behavior Surveillance-United States, 2013. *MMWR*. 2014; 63(4).
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- ¹⁶ Cokkinides V., Weinstock M., Lazovich D., Ward E., Thun M. Indoor tanning use among adolescents in the U.S., 1998-2004. *Cancer*. 2009; 115: 190-198.
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- ¹⁸ Lazovich D, Vogel RI, Berwick M, Weinstock MA, Anderson KE, Warshaw EM. Indoor tanning and risk of melanoma: a case-control study in a highly exposed population. *Cancer Epidemiol Biomarkers Prev*. 2010;19: 1557-1568.
- ¹⁹ Guy GP, Watson M, Richardson LC, Lushniak BD. Reducing indoor tanning—an opportunity for melanoma prevention. *JAMA Dermatol*. 2016; doi: 10.1001/jamadermatol.2015.3007.
- ²⁰ U.S. House of Representatives Committee on Energy and Commerce Minority Staff. (2012, February 1). False and Misleading Information Provided to Teens by the Indoor Tanning Industry – Investigative Report.
- ²¹ United States of America Federal Trade Commission. (2010, May 13). In the Matter of Indoor Tanning Association, a corporation - Docket Number C-4290 Decision and Order. Available at ftc.gov/os/caselist/0823159/100519tanningdo.pdf.
- ²² U.S. Department of Health and Human Services. The Surgeon General’s call to action to prevent skin cancer. Washington, D.C.: U.S. Dept of Health and Human Services, Office of the Surgeon General; 2014.
- ²³ Federal Register. General and plastic surgery devices: reclassification of ultraviolet lamps for tanning, henceforth to be known as sunlamp products and ultraviolet lamps intended for use in sunlamp products. Published June 2, 2014. Accessed March 10, 2016. <https://www.federalregister.gov/articles/2014/06/02/2014-12546/general-and-plastic-surgery-devices-reclassification-of-ultraviolet-lamps-for-tanning-henceforth-to>.
- ²⁴ U.S. Department of Health and Human Services. *Healthy People 2020: Cancer*. Updated February 24, 2016. Accessed February 25, 2016. <http://www.healthypeople.gov/2020/topics-objectives/topic/cancer/objectives>.
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