



POSITION STATEMENT

UV Protection and the Use of Sunscreens

Position

The Pharmacy Guild of Australia supports Cancer Council Australia's position that sunscreen is an important sun protection measure but should not be used as the first or only line of defence against ultraviolet radiation (UV radiation). Sunscreen products do not provide 100% protection against UV radiation irrespective of the stated Sun Protection Factor (SPF) rating¹. As such, the Guild encourages its members to promote the SunSmart 'Slip, Slop, Slap, Seek, Slide'² messages as well as stocking a comprehensive range of sunscreen to meet the full needs of consumers.

The Guild believes that all sunscreen products should continue to be regulated to comply with relevant standards, testing requirements and labelling and that all sunscreens must be required to comply with the 2021 standard³ (AS/NZS 2604:2021) from the adoption commencement date. The Guild believes that cosmetic sunscreens should be regulated by the Therapeutic Goods Administration (TGA) to assure consumers that they have been approved as safe and effective like therapeutic sunscreens.

A community pharmacy is ideally placed to assist consumers in meeting their 'sun safety' needs. As such, community pharmacies should be supported and resourced in order to provide consumers with the most current information and appropriate sun protection products. The Guild supports the training of pharmacy assistants involved in the sale of sun protection products to ensure their advice to consumers is appropriate and they know when to refer to the pharmacist for professional advice. Consumers should be advised regarding SPF numbers and that they are only a guide as there are many variables which can affect their effectiveness with each individual use. The Guild believes consumers should consult with appropriately trained pharmacy staff regarding their individual needs as a direct translation of the SPF number to an individual's exposure time to sunlight is to be discouraged because of significant variation between individuals as to what constitutes a 'safe' period of time⁴.

Consumers should be advised regarding the balance that is required between excessive sun exposure which increases the risk of skin cancer and enough sun exposure to maintain adequate vitamin D levels. Several studies have shown that sunscreen use has minimal impact on vitamin D levels over time.⁵ However, people at risk of vitamin D deficiency should consult with their doctor for advice on the requirement for a vitamin D supplement. Extended and deliberate sun exposure without any form of sun protection when the UV Index is 3 or above is not recommended, even for those diagnosed with vitamin D deficiency.⁶ The Guild believes that with appropriate training, community pharmacists and pharmacy assistants will be able to provide an early assessment and referral of potential skin cancers. This will be beneficial for patients to identify early signs of skin cancer which is a key factor in the treatment of cancer.

Community pharmacy staff should ensure that they are up to date with contemporary recommendations to ensure they provide appropriate and evidence-based advice to consumers. This can be achieved through completion of continuing professional development (CPD) for safe and appropriate use of various products

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including but not limited to sunscreen lotions and creams, spray sunscreens, cosmetic sunscreens, and fake tanning products. Pharmacy staff should use their knowledge to spread awareness that cosmetic sunscreens and tanning products do not provide any protection against UV radiation due to their low to no content of SPF and their uneven application methods. Consumers should also be encouraged to use a suitable broad-spectrum sunscreen under these products.

Spray sunscreens

Spray sunscreens also known as aerosol sunscreens are mixed with various propellants and are more dilute than lotions and cream sunscreen⁷. This means that the quantity required to achieve the same coverage as that of a lotion or cream sunscreen is much higher for an aerosol sunscreen⁸. The Guild is concerned that users of spray sunscreens may be misinformed about the significant limitations of the product and may assume that they are adequately protected. The Guild highlights that Cancer Council has strongly urged Australians against using aerosol sunscreens⁹. It is important for pharmacies to encourage consumers to use a broad-spectrum lotion or cream sunscreen for adequate sun protection.

Pharmacy staff are trained healthcare professionals who would be able to guide consumers in choosing the right sunscreen for them and counsel them on the application techniques.

Background

According to the Cancer Council Australia, sun exposure is the cause of around 99% of non-melanoma skin cancers and 95% of melanoma in Australia, where two in three Australian will be diagnosed with skin cancer by the time they are 70.¹⁰ Therefore, the advocacy of appropriate sun protective measures to reduce the incidence of skin cancer must continue with high priority as a public health policy.

All sunscreens with a primary SPF of 4 and above must be listed by the Australian Register of Therapeutic Goods (ARTG) before they can legally be marketed in Australia, and must comply with the Australian and New Zealand Sunscreen Standard AS/NZS 2604 Sunscreen products-Evaluation and classification in force at the time of listing.

The Australian Regulatory Guidelines for Sunscreens (ARGS)¹¹ have been developed to provide guidance to sponsors and manufacturers, and to assist in the understanding of the regulatory requirements for sunscreens in Australia. The Guidelines have been produced by the TGA in consultation with the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) and the pharmaceutical and cosmetics industries.

Advertisements for therapeutic sunscreens are required to comply with the Therapeutic Goods Advertising Code¹².

Related Position statements

Advertising of Professional Pharmacy Products and Regulated Health Services (pending endorsement)

Authority

Endorsed

National Council – July 2024

National Council – December 2012

National Council – February 2006

National Council - November 1993

Reviewed

Practice, Policy and Regulation Sub-Committee - February 2024

References

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- 1 Cancer Council of Australia 'Position Statement: Use of SPF 30+ sunscreens' (June 2005)
 - 2 Cancer Council of Australia 'Slip, Slop, Slap, Seek, Slide' Campaign website
 - ³ Therapeutic Goods Administration, "Updates to the Sunscreen Standard" (April 2024)
 - 4 Op. Cit (1)
 - 5 PubMed, R.E. Neale et al, 'The effect of sunscreen on vitamin D: a review' (Nov 2019)
 - 6 Cancer Council of Australia, 'Position Statement – Sun exposure and vitamin D – risks and benefits'
 - 7 QUT Improving Health Outcomes for People Report 'Testing and Evaluating Aerosol Sunscreens' (November 2020)
 - 8 Therapeutic Goods Administration 'Therapeutic Goods Advertising Cods 2007' (March 2007)
 - 9 Cancer Council and Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) Media Release 'Cancer Council strongly urges Australians against aerosol sunscreens – new study shows they are ineffective in typical wind conditions' (Dec 2020)
 - 10 Cancer Council of Australia 'Position paper: risks and benefits of sun exposure' (May 2007)
 - 11 Op. Cit (3)