



Feb. 9, 2016

Kansas House of Representatives
Health & Human Services Committee
The Honorable Daniel Hawkins, Chair
Kansas State Capitol – 300 S.W. 10th St
Topeka KS 66612

Dear Rep. Hawkins and Committee:

The American Suntanning Association would like to offer important information that may assist you in addressing Kansas HB 2369 – a bill that would prohibit Kansas residents under age 18 from being able to utilize sunbeds in a sunbed salon – even with a parent's written consent, which is the current standard in professional salons.

- The U.S. Food and Drug Administration on Dec. 21, 2015 introduced proposed rules to prohibit usage of sunbeds in sunbed salons by clients under age 18. That proposed rule (Docket No. FDA-2015-N1765, RIN 0910-AH14) is currently under review and will supersede any action the Kansas Legislature would take on this matter.
- Neither the FDA's proposed rule nor Kansas HB 2369 would address the real issue – that teens who cannot tan in a professional sunbed salon still have access to sunbeds in homes, at gyms, in apartment complexes and in other unsupervised locations. According to a Rutgers University study conducted in 2015, unsupervised sunbed use makes up 41 percent of sunbed use today – a number that has grown significantly in recent years. This action will simply drive the market underground to less-controlled usage of sunbeds.
- The very studies used to implicate the risks of sunbeds, when separated by LOCATION of the sunbed unit – at home, in a dermatologist's office used for psoriasis treatment, or in a sunbed salon – show that dermatology units have the highest relative risk (96% increase), followed by home units (40%) with professional salon units only increasing risk 6%. Sunburn prevention is the key.

ASA formed in 2012 to call for objective discussion of the risks and benefits of any UV exposure and for heightened responsibility both in the tanning market and in those who oppose UV exposure. ASA is happy to work with you to constructively address the sun-care issue in a way that cuts through overstatements that hurt everyone.

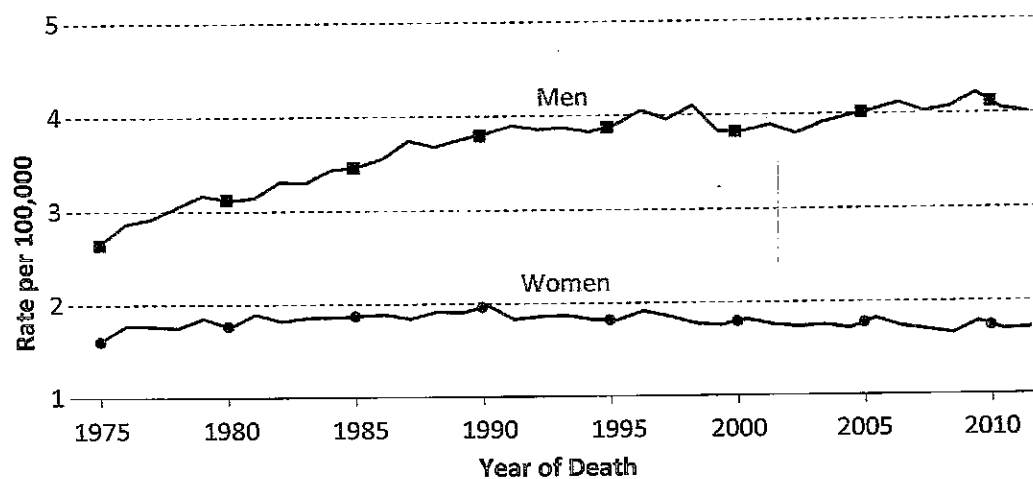
Because FDA is addressing this issue right now, and because that action would supersede Kansas HB 2369, and because the bill would not address the real issue, we encourage you to table this bill this session.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Levy", is written over a faint, larger signature.

Joseph Levy, scientific advisor
American Suntanning Association

Figure 3. Age-adjusted Melanoma Death Rates, by Sex, United States, 1975-2011



Source: Surveillance, Epidemiology, and End Results (SEER) Mortality Database.⁹ Underlying mortality data from the US Mortality Files, National Center for Health Statistics.
Note: Rates are per 100,000 people and are age-adjusted to the 2000 US Standard Population.

