

Canadian Cancer Society Won't Correct Misstatements, Refuses Meeting

The Canadian Cancer Society (CCS) has refused to answer questions about public misstatements its officials have made about UV exposure and has refused to sit down with representatives of the Canadian sunbed industry to even discuss the matter, despite requests from government officials that such a meeting should take place.

The Joint Canadian Tanning Association (JCTA) on Feb. 21 formally requested a meeting with CCS officials to discuss CCS misstatements in its lobbying efforts and ways the groups could come together to support a common sun safety education message. JCTA's written request went unanswered until it was sent again on March 21, when CCS declined both a proposed meeting and to answer questions from JCTA.

Below are the letters sent to the CCS from the JCTA and Letter from the CCS

"Canadians should be very concerned that CCS - a non-profit charity - is not behaving in an academic fashion," Joint Canadian Tanning Association President Doug McNabb said. "Presented with the fact that they are misleading the public with certain statements, they have declined to even discuss their errors. Our letter and the unanswered questions speak for themselves."

CCS said the answers to JCTA's questions are on CCS's web site. None of them are. Among the misstatements:

- A senior CCS official stated publicly that people who use sunbeds "might as well go back to Hiroshima when the bomb was dropped."
- CCS has alleged that tanning is as dangerous as smoking -- a ludicrous comparison both by numbers and biology. Humans need UV exposure to live, whereas tobacco usage introduces the body to dozens of unnatural carcinogens. Smoking related deaths are 50 times those related to Melanoma. A direct causal connection with UV and melanoma has yet to be established. Melanoma cancer is still more common in indoor workers than it is in outdoor workers who get 4-10 times more UV exposure.
- CCS is lobbying against sunbed usage, but has refused to call for dermatology to suspend its usage of sunbeds to treat purely cosmetic skin conditions -- a usage that often involves intentional sunburn and which World Health Organization data shows is 16 times riskier than commercial sunbed usage. In fact, CCS, in lobbying against sunbed usage, has lobbied to preserve the usage of sunbeds by dermatologists.

"On a number of occasions we have been asked by government officials why we haven't met with the CCS," McNabb said. "For the betterment of public health in Canada we reached out to gain a better understanding of the CCS's lobbying and communications efforts. We are disappointed that the CCS has taken such a one-sided approach to these issues."

About the Joint Canadian Tanning Association

Founded in 2002, the JCTA is a national non-profit organization created to increase understanding of the professional tanning industry's scientifically supported position that regular moderate ultraviolet exposure from sunshine or sunbed, in a non-burning fashion, is part of a responsible lifestyle that recognizes both the inherent benefits and the manageable risks associated with ultraviolet light exposure. TanAwareness.com provides a balance to the messaging Canadians receive regarding sun exposure and sunbeds.

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February 21, 2012

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Dear Mr Goodhand,

RE: Meeting request regarding teen indoor tanning

I am the President of the Joint Canadian Tanning Association (JCTA). We are aware of the significant influence the Canadian Cancer Society (CCS) carries in establishing public health policy in Canada and that the CCS believes the appropriate direction is to ban teens from indoor tanning. The JCTA is hoping to gain an understanding of the CCS's position and further the basis for how the CCS's position is being communicated. On a number of occasions we have been asked by government officials why we haven't met with the CCS. This is our formal request to meet with you personally to gain a better understanding of your position and perhaps reach a mutual agreement on what might best serve the interest of Canadian teens and their parents. The following is a summary of public positions and facts conveyed by the CCS and its employees/volunteers both in public forums and through media interviews that we wish to address in our meeting.

- 1) The World Health Organization has classified tanning beds as a Group 1 Carcinogen and therefore minors should be banned from using tanning equipment. We believe this to be an oversimplification of a complex issue.

Request for clarification: Oral Contraceptives (birth control) are also listed as a Group 1 Carcinogen and have been for decades. Your organization has not advocated any regulations regarding the use of these pharmaceuticals by teenagers that we are aware of. Even more perplexing is that this Group 1 carcinogen may be given to teenagers without the parent's consent or knowledge. Would you share with us the reason the CCS has not taken any formal position against this drug being distributed to teenagers in a fashion similar to the position you have taken against tanning beds?

- 2) In CCS communications, comparisons are drawn between indoor tanning and smoking. As I trust you are aware, the actual statistics give no justification for such an extreme message or comparison. According to Health Canada, tobacco related premature deaths are estimated at 37,000 while melanoma related mortality is estimated to be less than 900; the majority of those are age 60+ and not all of these can be attributed to UV exposure or even more specifically, sunbeds. Should the CCS continue making these comparisons, which would diminish the importance of the anti tobacco message, when the statistics do not support them?

- 3) Sunlight is also listed as a Group 1 carcinogen by The World Health Organization and has been since 1992. The World Health Organization is almost always cited in CCS communications regarding UV exposure. Will the CCS advocate that governments reduce their liability calling for minors to be excused/banned from any occupational hazards they may encounter under government employ; such as being exposed to sunlight at public swimming pools or municipal golf courses? Do you foresee calling for a ban of minors going on sunny vacations, outdoor activities between 10am and 2pm such as using public golf courses and beaches and even government sponsored sports leagues?
- 4) Dermatologist administered UV phototherapy, according to the World Health Organization's data, presents the greatest risk of all UV emitting equipment at an increased risk of 96% (16 times the risk of tanning facilities), followed by home units at 40% (7 times the risk of tanning facilities) and commercial tanning salon equipment at 6% which I am sure you are aware is statistically insignificant. Given this, why does the CCS continue to promote that commercial tanning salons present a 75% increased risk when the data in fact shows a 6% increase risk? In addition, the CCS has made/taken no position on the highest risk phototherapy equipment used by dermatologists. This equipment is used to treat non-life threatening, cosmetic skin conditions. In fact, any proposed regulations to date have specifically excluded this type of equipment. Does the CCS plan to include UV emitting phototherapy devices when it calls for teenagers to be banned from using this type of equipment?
- 5) Skin Type, it is our position, is the most important risk factor as it relates to risks from UV exposure. In fact if you remove Skin Type 1's from the World Health Organization's IARC data the risk showed no statistically significant link. If the objective of the CCS is to truly reduce the risk of UV related melanoma why does the CCS not address the #1 risk factor according to World Health Organization data for UV related melanoma, that being skin type.

The World Health Organization places both sunbeds and sunlight in the same classification. Given that parents remain responsible for educating their children regarding UV exposure outdoors, it seems sensible to respect parent's rights and abilities and thus have them involved in these decisions for indoor UV exposure. Thus, our proposal is one that respects parents and involves them in any regulations that impact their children. The proposal is as follows:

- 16 and under – The parent must physically attend every tanning session with their child
- Under18 – The parent must physically attend and sign on behalf and along with their teenager at the point of purchase of each tanning package.

To draw a comparison; the leading cause of death amongst teenagers is auto related accidents. A 16 year old may currently drive an automobile, even without parental consent. This activity also puts others at risk. Health Canada only recommends in their guidelines for tanning salon operators that equipment is not recommended for use under the age of 16.

Further we support regulations that require staff to be trained and certified, as well as government inspections of equipment and premises. Indoor tanning equipment is labeled very clearly and explains the risks from UV.



CCS representatives have even gone so far as to state that a teen being tanned is the same as being in Hiroshima when the bomb was dropped. We look to gain a better understanding of the basis for extreme statements such as these being made by the CCS. The JCTA hopes you will agree that the health of Canadians is best served by our organizations meeting to discuss this issue and gain a better understanding of our respective positions. Steve Gilroy, the JCTA's Executive Director, and I can make ourselves available to travel to Toronto to meet at your convenience.

Given this is a pressing issue we ask that you confirm your willingness to meet by February 26th, 2012. Upon receipt we could arrange our schedules to coordinate a meeting. I await your reply.

Sincerely,

Doug McNabb
President
Joint Canadian Tanning Association

DM/tlw

Cc: Steve Gilroy, Executive Director, JCTA



March 21, 2012

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Dear Mr Goodhand,

RE: Follow up to meeting request regarding teen indoor tanning

This letter is a follow up to our letter sent February 21, 2012. The JCTA is disappointed that you have chosen to ignore our invitation to meet and discuss the Canadian Cancer Society's advocacy of regulations regarding indoor tanning. As we stated in our letter, we are very supportive of regulations for indoor tanning; however, we believe the resulting regulations should be based on science. We expected that a respected organization like the CCS would at the very least have sent a response in the event they did not see it in their best interest to meet and discuss the issues. Our letter was sent both via email and courier to ensure you received it.

As I am sure you are aware, municipal, provincial and federal governments are all considering regulations governing indoor tanning and its use by Canadians. In our letter we sought to gain an understanding of the CCS's position and specifically, clarifications on what we believe to be very important issues the CCS has taken positions on. We realize the issues presented were complex and thus we allowed for a much longer response time than originally proposed in the letter before this follow up. We will assume that the CCS has no information to respond to our requests as it relates to indoor tanning facilities. It remains our goal to reach a comprehensive set of regulations based on science. We felt this would be best achieved through objective and constructive dialogue. It is unfortunate that your organization does not see this as an effective path.

Our offer to meet remains open until 5:00 pm, Monday March 26th, 2012.

Sincerely,

Doug McNabb
President
Joint Canadian Tanning Association

DM/tlw

Cc: Steve Gilroy, Executive Director, JCTA



Canadian Cancer Society
Société canadienne
du cancer

March 30, 2012

Doug McNabb
President, Joint Canadian Tanning Association
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Dear Mr McNabb:

Regarding your letters dated February 21st and March 21st, we thank you for your recognition of our work influencing healthy public policy in Canada.

With regards to your specific questions, most of the information you have requested is publicly available on our website. The Canadian Cancer Society develops positions and recommendations that are informed by the evidence. This evidence shows that intentionally being exposed to cancer-causing UV radiation for the sake of a tan poses no health benefit. Even for vitamin D synthesis, a tan is not necessary. Because research shows that indoor tanning is especially harmful to young people, we believe that where possible, legislation should be in place to protect young Canadians from UV-emitting devices. The Society is very active in promoting UV safety from any exposure (sun, tanning beds) for all ages, including those under 18. We promote this message for people of all skin types, since people of all skin types are at risk of developing skin cancer from UV exposure, such as that from tanning beds. As we say on our website, "When your skin changes colour after being exposed to ultraviolet (UV) rays, it's because your skin is producing melanin to try to protect itself. Tanned skin is damaged skin."

The evidence on indoor tanning is very strong. The most highly regarded organizations for cancer research and epidemiology have determined, based on hundreds of scientific studies, that exposure to UV radiation, from either the sun or from tanning beds, is the primary cause of skin cancer. These organizations include the World Health Organization's International Agency for Research on Cancer and the US National Toxicology Program. Furthermore, Health Canada does not recommend the use of tanning equipment – especially for people under the age of 18.

Given the information we have made publicly available, we respectfully decline your request for a meeting. We encourage your organization to take a leadership role and support a ban on tanning bed use for those under 18 and on advertising indoor tanning to those under 18.

Sincerely,

Peter Goodhand
President and CEO

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