

***Controlling the Health Risks
Associated with UV Tanning Equipment (INDG209)***

**Summary of
Responses to an HSE Consultation Paper**

Introduction

1. Since INDG209 was published in the mid 1990s, there has been considerable technological change in the UV tanning equipment industry as well as an expansion in the use of such equipment. There have also been concerns raised about the number of children and young people using UV tanning equipment. HSE worked with the Department of Health (DH) and key stakeholders (see below) to produce a revision of the guidance to go some way to addressing these issues.

Key stakeholders involved in revising INDG209:

Local Authorities Co-ordinators of Regulatory Services (LACORS),
Cancer Research UK (CRUK),
the Committee on Medical Aspects of Radiation in the Environment (COMARE),
the Chartered Institute of Environmental Health (CIEH), and
The Sunbed Association (TSA).

Officials contributed from the following Governments/Departments:

the Welsh Assembly Government,
the Scottish Government,
the Health and Safety Executive Northern Ireland (HSE NI),
the Department for Business, Enterprise and Regulatory Reform (BERR),
and
the Department of Communities and Local Government (DCLG).

2. The guidance is primarily aimed at employers or self-employed people who operate UV tanning equipment (eg sunlamps, sunbeds and tanning booths), but also has advice for their customers. The guidance covers:

- the main legal responsibilities of UV tanning equipment operators under the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999;
- information on the hazards associated with running UV tanning equipment;
- sensible advice on conducting an assessment of the risk of operating UV tanning equipment;
- advice on how to safely operate UV tanning equipment; and
- a separate section with information for customers.

3. Several sections from the existing guidance were updated or changed:

- Introduction
 - Extra information on the risks of exposure to UV radiation for young people was included, referring to WHO guidelines.
- Part 1 Information for UV tanning equipment operators
 - This section was overhauled, employing HSE's five steps to risk assessment, to clearly explain operators' legal responsibilities, the common hazards, how to assess risk, and advice on operating UV tanning equipment safely, including provisions on staffing.
- Part 2 Customer advice was overhauled and now contains

- facts to consider when deciding whether to use UV tanning equipment; and
- information on skin types.

4. Consultees were not asked specific questions but just if they had any comments on the revised guidance.

5. HSE directly contacted interested parties (organisations, businesses and individuals), whose details were gathered from existing stakeholder lists and from the key stakeholders who helped to revise the guidance, to inform them of the consultation exercise. The exercise was promoted on HSE's website and via specific journals/publications.

6. The consultation exercise ran from 24 April 2008 for 12 weeks until 17 July 2008. Responses to the exercise were sent to HSE by post or to a dedicated email address (sunbeds@hse.gsi.gov.uk).

Executive Summary

1. We received 65 separate responses to our invitation to comment on the revisions to INDG209 (*Reducing health risks from the use of UV tanning equipment*). The majority of respondents (44), who tended to be local authority inspectors or health professionals, wanted to see greater regulation of the commercial use of UV tanning equipment, whereas 20 respondents (mainly UV tanning equipment operators) believed the changes went too far. Only one person wholly supported the revised guidance.

2. The most common themes raised by respondents were

- the guidance had been weakened and should actually set out minimum standards,
- under-18s should not be allowed to use UV tanning equipment,
- unmanned and coin-operated UV tanning equipment should be banned,
- UV tanning equipment should be regulated or licensed, and
- the guidance should not attempt to restrict 16 and 17 year olds from using UV tanning equipment.

The other comments received had the support of less than 10 people/organisations.

3. Where possible HSE has incorporated suggested changes to the guidance, for example explaining the situation in Scotland (see paragraph 13 onwards of this report). However, in certain areas we have been unable to adopt the changes requested by respondents, because they are not supported by current HSE policy on enforcing section 3 of the Health and Safety at Work etc Act 1974.

Summary of Consultation Responses

Support for the guidance

1. There was limited support for the changes made to the guidance, with most respondents believing the guidance was too prescriptive or not prescriptive enough. Only one person wholly supported the new version. Others who expressed support (9 in total) also believed parts of the guidance went too far or not far enough.

2. Supportive views included:

- The changes help to raise awareness of the hazard of UV radiation from UV tanning equipment.
- The new version places greater emphasis on ill-health effects.
- The changes are thorough and accessible.
- Approve of the lack of prescription.

The changes do not go far enough

3. The majority of respondents (44) did not believe the changes to INDG209 went far enough. Most of these people were local authority inspectors or in the health profession.

The most frequent comments were:

- Too much use of 'suggested good practice' or the guidance has been weakened or the guidance should set out minimum standards.
- Under-18s should not be allowed to use UV tanning equipment.
- Unmanned/coin-operated UV tanning equipment should be banned.
- Regulation is required and/or a licensing scheme.

4. Comments with less than 10 people supporting each one included:

- Include something about the cumulative effect, eg keeping customer records, asking about previous exposure or have a national database.
- Make the guidance mandatory or have an Approved Code of Practice (ACoP).
- The guidance does not give inspectors a tool to control UV tanning equipment nor clarify enforcement options.
- Include guidance on keeping children, who are accompanying parents, away from UV tanning equipment.
- Additional guidance is required for Scotland or the guidance will not be relevant for Scotland.
- Include more information about the hazards of some pharmaceutical drugs, herbal products and complimentary medicines.
- Include information about the EN standard for UV lamps and more about the impact of changing tubes.
- Include more information about cleaning oneself before tanning and not wearing cosmetics, accelerants etc while tanning.
- Customers with skin types I and II should not be allowed to use UV tanning equipment.
- Develop a national curriculum of training and place more emphasis on training of staff.
- Give staff a checklist for dealing with customers (an example was provided).
- Put greater emphasis on having adequate information from the manufacturer and supplier, and provide staff training on this.

5. Comments from individuals included:

- The old guidance was better as it assumed staff would be present.

- Include information that some Councils license UV tanning equipment.
- Include more information about limiting exposure of staff.
- Some of the information in Part 2 should be up front in Part 1.
- Include more information about the vulnerability of young people and duties under the Management of Health and Safety at Work Regulations 1999 and security issues for all customers.
- Include information about sharing the risk assessment with customers.
- Include information about monitoring the risk assessment.
- Include advice for customers on using a UV tanning for the first time or after a break.
- Do not list The Sunbed Association under 'useful information' as they are a marketing organisation and have inaccurate information on their website.
- Better communication of the risks is required, taking into account literacy levels, visual acuity, language etc.
- Include more information about the relationship between UV tanning equipment use and malignant melanoma.
- Do not allow operators to promote the benefits of using UV tanning equipment.
- The legal duties of operators to their customers under Section 3 of the Health and Safety at Work etc Act 1974 should be clear.
- Include an example risk assessment.
- Remove UV tanning equipment from local authority premises.
- Educate young people about the risks.
- Include information about restricting the number of UV tanning equipment sessions to 20 a year.

The changes go too far

6. A number of respondents believed that the changes to the guidance went too far (20); these were UV tanning equipment operators, users and researchers. The most common comment was that there was no medical or scientific evidence to bring the age limit up to 18; also that 16 is old enough to make an informed decision about using UV tanning equipment. A number of people sent in petitions from their 16 and 17 year old customers objecting to the revised guidance's advice that operators be mindful of WHO recommendations (that under-18s should not use UV tanning equipment) when conducting their risk assessment.

7. Other comments were:

- The benefits of UV tanning equipment have been overlooked, eg providing vitamin D.
- The skin cancer risk from UV tanning equipment is not well-established.
- It is burning that leads to skin cancer and not tanning.
- There is no medical evidence to support the advice that pregnant women should not use UV tanning equipment.

HSE's response to consultation comments

General comments

8. Respondents did not like our use of the phrase 'suggested good practice'. Due to the strength of feeling against this phrase and following legal advice, wherever this phrase appears in the guidance we have changed the wording to 'good practice'.

9. Comments suggested that the revised guidance was no longer a tool that inspectors could use to control the use of UV tanning equipment nor did it clarify enforcement options. The current version of the guidance has been used by inspectors to control the use of UV tanning equipment, and since we have only introduced minor changes we do not agree that it is no longer a useful enforcement tool.

10. A number of comments focused on the regulation of UV tanning equipment; asking us to set out new standards, produce new legislation, make the guidance mandatory, produce an Approved Code of Practice (ACoP), license operators, ban use by under 18s and ban the use of unmanned/coin-operated equipment. Some respondents suggested that HSE could achieve such regulation using section 3 of the Health and Safety at Work etc Act 1974 (HSWA). Section 3 of the HSWA places general duties on employers and the self-employed towards people other than their employees. Since the scope of section 3 is very broad, HSE has adopted a policy of prioritising work activities covered by S3 that are key to achieving our mission (eg major hazards and construction) or which are not covered by other enforcing bodies or Government Departments. The primary risk of exposure to UV radiation from tanning equipment is to the user and the Department of Health is already considering the public health risk via the Cancer Reform Strategy. Hence, HSE believes it is more appropriate to address usage via public health legislation, rather than under section 3 of the HSWA. All of the comments asking for greater regulation and oversight of commercial UV tanning equipment have been shared with the Department of Health to help inform their ongoing work on the Cancer Reform Strategy.

11. A common observation, by respondents who felt the guidance had become too prescriptive, was that there was no scientific or medical evidence to support the recommendation that customers only use UV tanning equipment if over the age of 18. The revised guidance does now reference scientific papers that indicate that using UV tanning equipment at a young age increases the risk of ill-health effects such as skin cancer (reference 1). This recommendation also makes the HSE guidance consistent with World Health Organization (WHO), EU Scientific Committee on Consumer Products (SCCP) and COMARE¹ advice. This change to the guidance aligns England and Wales with the new Scottish legislation (the Public Health etc (Scotland) Act 2008), which bans under-18s from using UV tanning equipment.

Comments set in the context of the revised guidance

12. Most consultation comments referred to specific parts of the revised guidance, by making alterations (shown in red) and adding explanations we have tried to show how the guidance has been amended in response to comments or why it could not be changed. The original leaflet text appears in italic font.

Reducing health risks from the use of UV tanning equipment

¹ The Committee on the Medical Aspects of Radiation in the Environment

Introduction

The use of any ultraviolet (UV) tanning equipment (eg sunlamps, sunbeds and tanning booths) may expose staff and will expose customers to UV radiation. UV radiation can cause injuries and ill health either in the short term (eg sunburnt skin or conjunctivitis) or in the long term (eg premature skin ageing, skin cancer and cataracts). Exposure to UV tanning equipment before 35 years of age significantly increases the risk of several types of skin cancer. Younger people appear to be more vulnerable to the cancer effects of indoor tanning¹.

HSE considers the advice in this leaflet to reflect good practice for employers operating UV tanning equipment. This leaflet gives advice on how to reduce health risks.

Operators should note that the Public Health etc (Scotland) Act 2008 regulates the use of UV tanning equipment in Scotland. Scottish operators will need to consider these legal requirements over and above the advice in this guidance. More information about the Scottish legislation can be found at http://www.opsi.gov.uk/legislation/scotland/acts2008/asp_20080005_en_10#pt. Some English local councils and local authorities in Scotland also have licensing requirements for UV tanning equipment, so operators must ensure they are meeting local, legal requirements too.

The guidance is in two parts:

Part 1. General information for people who are responsible for operating UV tanning facilities.

We were asked to provide more information on limiting staff exposure to UV radiation, we felt sufficient detail had been included for the size of the leaflet and depth of the advice being given.

Part 2. Specific advice for customers. The information for customers is based on current expert medical opinion.

The guidance deals solely with the health hazards of UV radiation as they are currently understood. It does not provide an exhaustive list of all hazards associated with operating UV tanning equipment; for advice on other risks that could be encountered while operating UV tanning equipment, eg electrical safety, manual handling or general health and safety information, see the HSE website at <http://www.hse.gov.uk/> and the documents detailed at references 2-4.

We were asked to include advice on customer security and also the vulnerability of young users, but HSE does not consider the HSWA or the MHSWR to be appropriate in addressing these issues above and beyond the requirement to assess risk.

Part 1 Information for UV tanning equipment operators

Legal responsibilities

Under the Health and Safety at Work etc Act 1974 (HSWA)⁵ and the Management of Health and Safety at Work Regulations 1999 (MHSWR)⁶, you, the UV tanning equipment operator, must:

- assess the risks in your undertaking (ie the workplace) **to workers and users**, including those **risks arising** from exposure to UV radiation;
- take measures to control, as far as is reasonably practicable, the risks identified;
- tell your staff about the results of your risk assessment and make sure they are competent to put them into action, **which would include them having appropriate training in the operation and use of any UV tanning equipment**; and
- if you have five or more employees you must write down the significant findings of the assessment.

We were asked to advise that the risk assessment should also be shared with customers, but this is not a legal requirement under the HSWA or MHSWR and as such could not be enforced.

Carrying out the risk assessment is your responsibility though you can seek help and advice, from within your organisation or outside sources (eg consultants).

The Approved Code of Practice (ACoP) Management of health and safety at work: Management of Health and Safety at Work Regulations 1999⁶, contains further information about legal responsibilities under the HSWA and MHSWR.

Assessing the risk of using UV tanning equipment

The purpose of your risk assessment is to help you make an appropriate decision about the measures required of you to prevent or control UV radiation exposure levels to people working near or using your UV tanning equipment.

A risk assessment does not need to be long or complex, but you do need to work through the following five steps:

- Identify the hazards.
- Decide who may be harmed and how.
- Evaluate the risks and decide on actions.
- Record your findings (if you employ 5 or more people) and implement them.
- Review **and monitor** your assessment and update it if necessary.

HSE's leaflet 5 steps to risk assessment² gives straight-tforward advice. HSE also publishes example risk assessments to show what is expected. Both can be found at www.hse.gov.uk/risk.

We were asked to include an example risk assessment, but due to the need to keep the leaflet to a reasonable length, we will just retain the references to the 5 steps to risk assessment leaflet and the example risk assessments on the website.

The consequences of exposure to the hazard of UV radiation, which can be associated with running and/or using UV tanning equipment, are:

- short term:
 - burns,

- skin dryness and itching,
- eye irritation or conjunctivitis (where suitable goggles are not worn),
- customers becoming trapped if the equipment fails mechanically.
- long term:
 - skin cancer,
 - cataracts (where suitable goggles are not worn),
 - premature ageing of the skin, which will look coarse, leathery and wrinkled.

Who might be at risk? You will need to consider:

- employees assisting customers;
- maintenance staff carrying out repairs or servicing;
- the customers using the equipment; and
- other members of the public (adults and **under-18s**) on the premises.

*You must inform your employees of the risks of **operating and using** UV tanning equipment. To control the risk of exposure to UV radiation to your customers we advise you to provide them with the information in Part 2.*

Operating your UV tanning equipment safely

We were asked to stop operators from promoting the benefits of UV tanning equipment, but there is currently no legal basis for HSE to do this.

We were also asked to make local authorities remove UV tanning equipment from their premises, again there is no legal basis by which HSE could do this.

We have amended the phrase 'suggested good practice' to 'good practice' wherever it appears in the guidance.

Following the advice in this section will help you to address the risk associated with using UV tanning equipment. However, this is not an exhaustive list and as a result of your risk assessment, you may have identified other controls that need to be in place.

- *You should have received information from the manufacturer or supplier on the correct operation of your UV tanning equipment **and should have familiarised yourself and any employees with it**, and be following it. This information should include the correct lamps to use and the maintenance regime.*
- *It is good practice to have trained staff who will be present while customers are using your UV tanning equipment.*
- *You should provide ongoing health and safety training for your staff to ensure they can correctly run the equipment, provide customers with information about the risks and assist as required.*
- *It is good practice that you have effective procedures in place to provide immediate assistance to customers using your UV tanning equipment.*
- ***Ensure that children (under-18 years of age) accompanying parents who are using the UV tanning equipment are not exposed to the UV radiation.***
- *If you are operating more than one piece of equipment in the same room, you are recommended to use screening between units.*

- *It is good practice that you ensure the equipment is cleaned and sanitised between customers.*
- *When you are replacing UV tubes ensure the right type are fitted and reassess the exposure requirements of your customers when using the equipment. **The EN standard on manufacturing UV tanning equipment (60335-2-27) should provide more useful information.***
- *Ensure your staff are aware of the risks to themselves from working with UV tanning equipment and how to reduce or avoid these risks.*
- *It is good practice to keep training records for your staff.*
- *It is good practice that you provide adequate eye protection (goggles) for customers and staff, when maintaining the equipment.*
- *When carrying out your risk assessment you are advised to have regard to the World Health Organization (WHO) and EU Scientific Committee on Consumer Products (SCCP) who have recommended that under-18s should never use UV tanning equipment. **(Further information on the advice of these organisations can be found at <http://who.int/uv/intersunprogramme/activities/unartsunbeds/en/index.html> and http://ec.europa.eu/health/ph_risk/committees/04_sccp/docs/sccp_o_031.pdf.)***

HSE would like to thank the following organisations for their contributions to revising the guidance

- *Cancer Research UK*
- *The Committee on Medical Aspects of Radiation in the Environment*
- *The Sunbed Association*
- *The Chartered Institute of Environmental Health*
- *The Local Authorities Co-ordinators of Regulatory Services*
- *The Welsh Assembly Government*
- *The Health and Safety Executive Northern Ireland and Department of Health, Social Services and Public Safety Northern Ireland*
- *The Scottish Government*
- *The Department of Health*
- *The Department for Business, Enterprise and Regulatory Reform*
- *The Department of Communities and Local Government*

We were asked to remove The Sunbed Association (TSA) from the list of useful contacts as they are a marketing body. So we have removed TSA from the 'useful contacts' section in Part 2 and included an acknowledgement of all of the organisations and government bodies that helped us to revise the guidance.

References

1 *The association of use of sunbeds with cutaneous malignant melanoma and other skin cancers: A systematic review. The International Agency for Research on Cancer and Working Group on artificial ultraviolet (UV) light and skin cancer. Int. J. Cancer, 120, 1116-1122 (2006)*

2 *Five steps to risk assessment Leaflet INDG163(rev1) HSE Books 1998 (single copy free or priced packs of 10 ISBN 0 7176 0565 0)*

- 3 *Maintaining portable electrical equipment in offices and other low-risk environments Leaflet INDG236 HSE Books 1996 (single copy free or priced packs of 10 ISBN 0 7176 1272 4)*
- 4 *Essentials of health and safety at work (Third edition) Guidance HSE Books 1994 ISBN 0 7176 0716 X*
- 5 *Health and Safety at Work etc Act 1974 Ch37 The Stationery Office 1974 ISBN 0 10 543774 3*
- 6 *Management of Health and Safety at Work. Management of Health and Safety at Work Regulations 1999. Approved Code of Practice and guidance L21 (Second edition) HSE Books 2000 ISBN 0 7176 2488 9*
- 7 *Elwood J & Jopson J. Melanoma and sun exposure: an overview of published studies. Int. J. Cancer. 73 198-203 (1997)*
- 8 *Gandini S, Sera F, Cattaruzza et al. Meta-analysis of risk factors for cutaneous melanoma. II. Sun exposure. Eur. J. Cancer. 41(1). 45-60 (2005)*

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This document contains notes on good practice which are not compulsory but which you may find helpful in considering what you need to do.

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Published by the Health and Safety Executive INDG209(rev...)

Part 2 Customer advice

We were asked to require operators to keep records of customer usage or even to have a national database. HSE cannot currently require this of operators under the HSWA or MHSWR.

We were asked to educate young people about the risks of using UV tanning equipment, but HSE are not in a position to do this. This request has been shared with the Department of Health to help inform their work on the Cancer Reform Strategy.

One respondent thought we were overlooking the benefits of UV tanning equipment. They suggested that the skin cancer risk was not well-established and that only burning led to skin cancer. The majority of the stakeholders that helped us to revise the guidance did not share this view so we do not propose to change the tone of the information presented here.

Important warning: There are health risks associated with using UV tanning equipment – skin cancer, cataracts, premature ageing of the skin, sunburnt skin, dryness and itching, bumpy rashes, and eye irritation/conjunctivitis. Any exposure to UV radiation from tanning equipment is potentially harmful. Please consider the following information when deciding whether to use this equipment or not.

We were asked to advise customers to limit the number of tanning sessions to 20 a year (as per the current version of the guidance) but we decided that it was inappropriate to have a limit as it implies that there is a safe level of UV tanning equipment usage.

Don't use UV tanning equipment if your skin is particularly sensitive to sunlight.

Based on World Health Organization (WHO) and Department of Health advice, you should not use cosmetic equipment if,

- *You are under 18.*
- *You have fair, sensitive skin that burns easily or tans slowly and poorly.*
- *You have a history of sunburn, particularly in childhood.*
- *You have a large number of freckles and/or red hair.*
- *You have a large number of moles.*
- *You are taking medicines or using creams that sensitise the skin to sunlight.*
- *You have a medical condition that is worsened by sunlight.*
- *You or anyone in your family has had skin cancer in the past.*
- *You already have extensive skin damage due to sunlight.*

We were advised by COMARE (the Committee on Medical Aspects of Radiation in the Environment) that there are no medical reasons for pregnant women not to use UV tanning equipment (beyond the risks posed to the general public) so the reference to pregnant women in this list and the advice below has been removed.

The International Commission on Non-ionising Radiation Protection (ICNIRP) has recommended against the use of UV tanning equipment for non-medical purposes.

Know your skin

Skin is broadly classified as being one of six types:

- *Type I – Often burns, rarely tans. Tends to have freckles, red or fair hair, blue or green eyes.*
- *Type II – Usually burns, sometimes tans. Tends to have light hair, blue or brown eyes.*

We were asked to ban people with skin types I or II from using UV tanning equipment, but HSE cannot do this under health and safety legislation.

- *Type III – Sometimes burns, usually tans. Tends to have brown hair and eyes.*
- *Type IV – Rarely burns, often tans. Tends to have dark brown eyes and hair.*
- *Type V – Naturally brown skin. Often has brown eyes and hair.*
- *Type VI – Naturally brown/black skin. Usually brown/black eyes.*

Your UV tanning equipment operator should advise you on your skin type and guide you on how many minutes you should limit your session to. The EU Scientific Committee on Consumer Products states that people with skin types I and II should not be advised to use UV tanning equipment. If you have skin type III, IV, V or VI your operator should guide you on how many minutes to limit your session to.

Important points for you, the customer, to consider before you decide to use UV tanning equipment.

1. ***Skin cancer.*** *In the UK, the incidence of malignant melanoma is increasing at a faster rate than any other cancer except prostate. Using UV tanning equipment when young increases the risk of suffering from skin cancer in the future.*
2. ***Premature ageing of the skin.*** *In the longer term, too much use of UV tanning equipment will make your skin look coarse, leathery and wrinkled.*
3. ***Sunburnt skin.*** *Spending too long on UV tanning equipment can cause your skin to become painful and red, and it may blister and peel. Burning the skin from UV exposure can double your risk of skin cancer in the future^{7,8}.*
4. ***Protect your eyes.*** *Never use UV tanning equipment without eye protection. If suitable goggles are not worn you may suffer eye irritation or conjunctivitis in the short term, and cataracts (clouding of the lens of the eye) in the long term. Do not rely on closing your eyes or using cotton wool.*
5. ***Don't use cosmetics, deodorants or accelerants while tanning.*** *Wash off any such products on your skin before using the equipment and make sure the equipment is clean before using it.*

We were asked to provide more detail under this point, but we are trying to keep part 2 short to encourage customers to read it, so we have decided against including more detail.

6. ***Ensure you are medically fit to use the UV tanning equipment, and that you are not taking any medication, including alternative medicine and therapies,*** *that could increase the sensitivity of your skin. Some conditions can make you more vulnerable to sunburn.*
7. ***Know your skin.*** *Tell staff about your normal skin reaction to sunlight so they can advise you whether to use the equipment and if so, for how long*

*you can do so without burning (remember, using UV tanning equipment carries health risks even if you do not burn). (See **Know your skin** for further information.)*

8. **Check your skin.** *If you notice any abnormal skin reactions during the tanning session stop exposure at once and do not use UV tanning equipment again before seeing a doctor. If you notice any abnormal skin reactions after the tanning session do not use again before seeing a doctor. Seek medical advice promptly if you notice an unusual skin growth or a change in the size, shape or colour of a mole that occurs over weeks or months.*
9. **Stay safe.** *Ensure you understand how to use the equipment, how to turn it off and to locate the emergency button (or call for help if there is no button).*
10. **Protect your skin in the sun.** *A tan obtained from UV tanning equipment provides very little protection against sunlight. Always protect your skin from excessive exposure to the sun.*

Useful information

SunSmart, the UK's national skin cancer prevention campaign at www.sunsmart.org.uk

This information for customers is issued jointly by the Health and Safety Executive and the Department of Health

Table 1 – List of Respondents

All Party Parliamentary Group on Skin
Anglia Cancer Network (skin)
Association of Personal Injury Lawyers
Berkshire Environmental Health Managers Group
British Association of Dermatologists
British Photodermatology Group
Ms Barbara Burkey
Cancer Research UK
Chartered Institute of Environmental Health
Cheshire and Merseyside Public Health Network
Mr Michael Climer
Committee on Medical Aspects of Radiation in the Environment (COMARE)
Consol Suncenter
S. L. Cox
Ms Julie Dolphin
Mr James Dunne
Easy Tan Ltd
Environmental Health Lancashire
Environmental Health Merseyside
Ms Marion Franklin
Glasgow City Council
Dr Oliver Gillie
Greater Manchester Authorities of Salford, Trafford, Stockport, Wigan, Tameside, Oldham, Bury, Bolton & Manchester
Greater Manchester Public Protection Partnership Groups
Health Protection Agency
Health Protection Scotland
Mr Neal Horrocks
Mrs Sian James MP
Kent and Medway Cancer
Kent Public Health Networks
S. A. Kermode
Mr Graeme Kerr
Dr Alison McCallum
Merseyside and Cheshire Cancer Network
Merthyr Tydfil County Borough Council
Mr L. G. Milner
Mr Edmund Milnes
Ms Jenny Milward
Professor Harry Moseley
National Clinical Lead for Skin Cancer
New Forest District Council
Peninsula Cancer Network
Mr Adrian Raven
Mr Andy Read
Ms Shona Robison MSP
Ms Gwenneth Rylands

Ms Felice Scala
Miss Lisa Shaw
South East Wales Health and Safety Task Group
Stoke on Trent PCT
Mr John Swift
Tameside MBC
Tan Express
Teenage Cancer Trust
Mr Kevin Thomas
The Sunbed Association
The Sunbed Studio
Ulster Cancer Foundation
Unsigned petition
Mr Terry Vaughn
Wales Head of Environmental Health Group
Welsh Assembly Government
Welsh Local Government Association
West of Scotland Health and Safety Group
Mr Steven Wilkinson

Table 2 Breakdown of Respondents

Category	Number
Academic	4
Employers & Trade Associations	18
Individuals	25
Government Departments/Public Agencies	13
Trade Unions & Staff Associations	0
Voluntary Organisations	3
Other	2
Total	65