# **Proposed Code of Practice for Artificial Tanning**

**Discussion Document** 

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<sup>&</sup>lt;sup>\*</sup> This document has been prepared by EURO*SKIN* through consultation with its members. The views and recommendations expressed in the document are based on a commonly agreed understanding and interpretation of the science at the time of preparation. They do not necessarily represent or reflect the views or policies of the EURO*SKIN*'s members' employing organisations.

# **1** INTRODUCTION

# 1.1 Background

This document has been produced by the European Society of Skin Cancer Prevention (EUROSKIN) with the aim of stimulating focussed discussion on the need for a Code of Practice for the use of artificial ultraviolet radiation (UVR)-tanning equipment<sup>1</sup> in commercial premises. Such premises include solaria and other premises where artificial UVR-tanning is provided in addition to their main business - for example hairdressers and leisure and sports centres etc.

There are currently no commonly or uniformly agreed regulations, recommendations or codes of practice across Europe for the use of artificial tanning equipment by the general public.

The recommendations set out in this document should be considered as the minimum required and where national regulations, standards or codes of practice etc. exist that specify stricter requirements, they should be adhered to.

EUROSKIN emphasises that the purpose of this document is to stimulate discussion among all stakeholders.

It is emphasised that, recognising its potential for detrimental effects on health, EUROSKIN advises against artificial tanning. The provision of the Code of Practice should not be taken to imply that EUROSKIN endorses in any way the use of artificial tanning equipment for cosmetic purposes. It has produced this Code of Practice, in recognition of the widespread use of artificial tanning devices by the general public, to stimulate discussion and provide background information and guidance to national and local authorities aimed at minimising the risks associated with their use.

It is EUROSKIN 's view that a Code of Practice for artificial tanning accepted across Europe would be a powerful instrument towards achieving:

- A consistent minimum standard of health and safety for members of the public using artificial tanning equipment in commercial premises across Europe.
- Specific minimum engineering, labelling and use requirements for artificial tanning equipment as set out in agreed European technical standards.
- Specific minimum operating requirements for premises providing commercial tanning facilities to the public.

The elements of the Code of Practice are intended as representing minimum requirements for customer care and health for tanning premises. They are not intended

<sup>&</sup>lt;sup>1</sup> Where used in this document the term "artificial tanning equipment" refers to equipment used for 'suntanning' by means of exposing a person to ultraviolet radiation (UVR).

as a regulation. However, EURO*SKIN* recognises that the European Commission and national and/or local authorities may wish to consider elements of the Code of Practice for inclusion in drafting regulations. To this end, recommendations relevant to official inspection, reporting and licensing are provided in Appendix A.

The Code of Practice is founded on the view that:

- Health professionals and national and local health authorities wish to ensure that the risks to people undergoing artificial tanning in commercial premises are minimised.
- Authorities require consistent guidelines aimed at minimising risks to health should they wish to implement licensing, inspection and other regulatory controls.
- Customers should expect to receive efficient professional service in safe, clean, hygienic and comfortable surroundings.

Recommendations are directed towards reducing the risk of adverse health effects from the use of artificial UVR-tanning equipment. The scientific evidence for the potentially harmful effects of ultraviolet radiation on people has been reviewed by a number of scientific expert groups and their conclusions are well documented. Such expert reports include those from; the International Agency for Research on Cancer (IARC, 1992); the World Health Organization (WHO, 1994, 2003); the International Commission on Non-Ionizing Radiation Protection (ICNIRP, 2003) and from a number of national institutes and scientific review papers. The latter include those from; the UK independent Advisory Group on Non-ionising Radiation (AGNIR, 1995: AGNIR, 2002); Armstrong and Kricker (1996); Autier (2002); Césarini (2000); Greinert et al. (2001); Hawk (2000); Lavker et al. (1995); National Toxicology Program (2002); NHMRC (2002); Nordic Radiation Protection and Health Authorities (2005); Speight et al. (1994); Spencer and Amonette (1995); Wester et al. (1999) and Young (2003). Such evidence relates to the potential of UVR exposure to cause acute injury, such as 'sunburn' of the skin and photokeratitis of the eyes, and chronic damage that includes an increased risk of skin cancer, accelerated skin ageing and an increased risk of cataracts.

The specific recommendations set out in the Code of Practice are aimed at preventing acute injury to the skin and eyes of users of artificial tanning equipment and minimising the risk of adverse chronic effects. This recognises that adverse chronic effects result from stochastic (probabilistic) processes and therefore the risk cannot be reduced to zero. Other recommendations relate to the use of such equipment in clean, hygienic, controlled environments.

# 1.2 Towards a consistent approach

There are currently no uniformly agreed regulations or recommendations across Europe for the use of artificial tanning equipment by the general public. A few European countries have national regulations specifically addressing such use. However, in most countries, recommendations for use are generally provided in the form of advice from national expert bodies.

For advice in addressing the adverse effects on health associated with the radiation emissions of artificial tanning equipment, EUROSKIN looks to expert bodies in the field

of radiation and health protection and most notably to WHO and ICNIRP and to its own expert members. EUROSKIN also recognises the importance of technical standards in respect of the design, construction, electrical and mechanical safety and aspects of the use of artificial tanning equipment. The International Electrotechnical Commission (IEC), the European Committee for Electrotechnical Standardization (CENELEC) and national technical standards bodies play a key role in the development and harmonisation of such technical standards.

EUROSKIN considers that advice on UVR artificial tanning and health from WHO is particularly significant. It is comprehensive and was developed through collaboration with a number of other international and national expert bodies. This advice is set out in the publication "WHO Guidance Brochure: Artificial Tanning Sunbeds" (WHO, 2003).

An important element of the advice is a set of recommendations to government health ministries, viz.

"GOVERNMENTS SHOULD CONSIDER COMPREHENSIVE LEGISLATION GOVERNING THE OPERATION OF SUNBEDS. ANY LEGISLATION SHOULD BE LEGALLY BINDING AND BE CAPABLE OF LOCAL ENFORCEMENT. IN COUNTRIES WHERE COMPREHENSIVE REGULATIONS HAVE BEEN IMPLEMENTED, THE EMPHASIS HAS BEEN ON PROVIDING BETTER INFORMATION FOR CONSUMERS, RESTRICTING ACCESS TO THOSE UNDER THE AGE OF 18 AND REDUCING THE NUMBERS OF AUTOMATED TANNING PARLOURS WORKING WITHOUT THE SURVEILLANCE OF AN OPERATOR.

IF A SYSTEM OF LICENSING COMMERCIAL SUNBED OPERATORS IS IMPLEMENTED, IT WILL BE IMPORTANT TO ENSURE THAT LICENSES ARE NOT GRANTED IN A WAY THAT SUGGESTS THAT LICENSED SUNBEDS ARE SAFE EITHER IN ABSOLUTE TERMS OR IN COMPARISON TO UNLICENSED OPERATORS.

IF THE POLITICAL ENVIRONMENT DOES NOT SUIT LEGISLATION, THEN GOVERNMENTS CAN CONSIDER A COMPREHENSIVE SET OF STANDARDS IN CONJUNCTION WITH THE ARTIFICIAL TANNING INDUSTRY THAT REFLECTS THE RECOMMENDATIONS CONTAINED IN THIS GUIDE. IN THIS CASE, SELF-REGULATION BY THE ARTIFICIAL TANNING INDUSTRY SHOULD BE SUPPORTED."

It is EUROSKIN's view that these recommendations signal the need to develop a uniform approach to providing adequate minimum levels of protection for the general public across Europe, and indeed globally.

# 2 PROPOSED CODE OF PRACTICE

#### 2.1 Introduction

The premise for the proposed Code of Practice is that any member of the general public using an artificial tanning device in commercial tanning premises<sup>2</sup> in any European

<sup>&</sup>lt;sup>2</sup> Such premises include solaria and other premises where artificial UVR-tanning is provided in addition to their main business - for example hairdressers, leisure and sports centres etc.

country should, at a minimum, receive the same adequate level of health and safety protection.

The elements of the Code of Practice are such that they could form a basis for the development of national codes of practice, for advice to the general public and for European, national and/or local authority regulations.

The Code of Practice is intended to apply only to the use of artificial tanning equipment by members of the public in commercial premises<sup>3</sup>. It is not intended to apply to the use of artificial tanning equipment in a person's private home<sup>4</sup>.

The Code of Practice does not apply to the use of medically approved equipment used under the direct supervision of a qualified medical practitioner in officially recognised hospitals and/or medical clinics.

# 2.2 Elements of the Code of Practice

The primary principles on which the Code of Practice are based are that:

- Protection of the health and safety of customers in tanning premises takes precedence over commercial considerations.<sup>5</sup>
- All tanning equipment used must be professionally tested and certified for compliance with the radiation, mechanical and electrical safety requirements set out in European Standard EN 60335-2-27 (EN, 2003)<sup>6</sup>.
- The use of artificial tanning equipment by members of the public in commercial premises should be supervised<sup>7</sup>.
- All staff should receive appropriate training and be examined and certified as to their competence (section 2.2.4).
- Inspections, licensing and other controls on the use of tanning equipment by the public in commercial tanning premises should be carried out by the relevant public authority or its authorised agency<sup>8</sup>.

<sup>&</sup>lt;sup>3</sup> It is EURO*SKIN*s view that where a member of the tanning premises' staff uses artificial tanning equipment on the premises for tanning themselves, they should be subject to the same protection measures as set out in the Code of Practice for the general public.

<sup>&</sup>lt;sup>4</sup> EURO*SKIN* advises against the use of artificial tanning equipment in the home, where the frequency of use and duration of individual UVR exposure is entirely at the discretion of the individual.

<sup>&</sup>lt;sup>5</sup> EURO*SKIN* emphasises that the recommendations in the Code of Practice should be considered as examples of the minimum required for compliance. Where national regulations, standards or codes of practice etc. exist, for example for electrical safety etc. that specify stricter requirements, they should be adhered to.

<sup>&</sup>lt;sup>6</sup> At the time of drafting this Code of Practice, the current European Standard was EN 60335-2-27 (EN 2003).

<sup>&</sup>lt;sup>7</sup> Here, 'supervised' means the use of artificial tanning equipment by the general public, only on premises, where appropriately trained members of staff are present.

<sup>&</sup>lt;sup>8</sup> Local authorities may wish to implement regulatory controls. To this end, recommendations relevant to official inspection, reporting etc. are provided in Appendix A.

# 2.2.1 Non-compliant use

The unsupervised use of artificial tanning equipment by members of the public in commercial premises is very strongly discouraged and would be in non-compliance with the Code of Practice<sup>9</sup>.

The use of artificial tanning equipment by children or young persons<sup>10</sup> would be in noncompliance with the Code of Practice. It should be the responsibility of the management of the premises to require appropriate proof of age.

# 2.2.2 Manufacture, testing and certification of equipment

The basic premise underlying the design and construction of artificial tanning equipment is that it should be mechanically and electrically safe and that UVR emissions should be appropriate to minimising the risk of adverse health consequences to the user. Tanning devices should be tested as to their compliance with electrical, mechanical and radiation safety requirements by an appropriate competent body. Compliance should be certified by an appropriately informative label affixed to the equipment in a position clearly visible to the user. Labels should be clearly identifiable as relating to the model and serial number of the equipment to which they are attached.

#### 2.2.2.1 Mechanical and Electrical Safety

An agreed European technical standard covers requirements for the mechanical and electrical safety of artificial tanning equipment - EN 60335-2-27 (EN, 2003). The use of any device not complying with these technical requirements is in non-compliance with the Code of Practice.

#### 2.2.2.2 UVR Emissions

The emission characteristics of the UVR delivered to the skin of the user by the tanning device should be expressed in terms of erythemally-weighted irradiance (EN, 2003).

The equipment should be classified according to EN 60335-2-27 (EN 2003) as type 3.

The total erythemally-effective UVR delivered to the skin of the user should not exceed 0.3 W  $m^{-2}$  which corresponds approximately to a Global Solar UV Index of 12, defined by WHO (2002) as "extreme conditions". This also approximates to the maximum solar UVR levels at Southern European latitudes at sea level.

#### 2.2.2.3 Devices for limiting exposures

To limit UVR exposures in accordance with the individual UVR sensitivity of the skin (UVR skin type and current degree of UVR adaptation) of the customer, the tanning device should be equipped with a meter (or appropriate timer) which allows the selection of total exposures. These should be set to range from 1 standard erythemal dose (SED) to a maximum of say 6 SEDs on the skin in increments of less than or equal to 0.5 SED.

<sup>&</sup>lt;sup>9</sup> Here, 'unsupervised' means the use of artificial tanning equipment by the general public in premises where no appropriately trained members of staff are present. It includes the use of coin-operated tanning equipment. EURO*SKIN* also advises against the use of artificial tanning equipment in the home.

<sup>&</sup>lt;sup>10</sup> WHO and ICNIRP recommend that the minimum age for the use of tanning equipment in commercial establishments should be 18.

To limit the risk of unexpected adverse effects (such as photosensitive disorders, photoallergic and phototoxic effects or other diseases) caused or exacerbated by UVR, the first exposure should be limited to 1 SED on the skin.

To prevent accidental excessive exposure, the tanning device should incorporate a switch that automatically switches off the UVR lamps after delivery of a predetermined cumulative exposure<sup>11</sup> to the skin of the user.

#### 2.2.3 Use of tanning equipment

The overriding responsibility of the management of the commercial tanning premises is to ensure the health, safety and comfort of the customer. This requires:

- The safe installation, operation, continued maintenance and safe use of the tanning and ancillary equipment.
- That all members of staff are provided with relevant training.
- The provision of appropriate advice to the customer, before, during and after tanning sessions.

# 2.2.4 Staff training

The presence of appropriately trained members of staff is essential for the health, safety and comfort of the customers using tanning premises. As a minimum, all members of staff should be provided with formal training by an appropriately qualified organisation<sup>12</sup>. The training should cover at least the following aspects of customer safety and care<sup>13</sup>.

An initial course<sup>14</sup> covering for example:

Basics of radiation physics relevant to artificial tanning equipment: Comparisons of UVR from the Sun and from artificial tanning equipment: Important elements of tanning equipment (UVR lamps, mirrors, optical filters, ventilation. Air filters - and looking after and replacing these elements and importance of maintaining records etc.): Human skin (anatomy, function, growth etc.): Effects of UVR on the skin: Skin types and UVR sensitivities: Skin cancers and other relevant skin diseases: Human eye: Effects of UVR on the eye: Systemic and other effects of UVR: Health risks in the solarium – (eye, skin infections, photo-allergic and photo-toxic reactions especially in relation to medicines

<sup>&</sup>lt;sup>11</sup> Currently, EN 60335 (EN 2003) limits accidental excessive exposure by the use of a timer (limit 60 minutes). It has been proposed to change this EN requirement to limiting exposure to a maximum of 800 J m<sup>-2</sup>, weighted with the CIE non-melanoma skin cancer spectral efficacy values. EURO*SKIN* proposes limiting such accidental exposure to 6 standard erythemal doses (600 J m<sup>-2</sup> - CIE erythemally weighted.).

<sup>&</sup>lt;sup>12</sup> Training should be provided by an organisation that is recognised as having the expertise in health care and radiation protection relevant to UVR exposure. It is anticipated that the funding for the provision of such training will derive from fees charged by the training provider to the tanning premises' management.

<sup>&</sup>lt;sup>13</sup> EURO*SKIN* recognises that there will be different approaches to the provision and certification of 'approved training' in different countries. Footnotes 13 to 16 are recommendations as to the duration etc. of courses.

<sup>&</sup>lt;sup>14</sup> EURO*SKIN* suggests that this course should be around 10 hours in duration held over 2 days and should include a 1-hour written examination.

and cosmetics etc.): Basic first aid: Adherence to this Code of Practice (awareness of provisions of EN 60335-2-27 etc.): Legal requirements and responsibilities<sup>15</sup>

Course participants should be examined and, if successful, provided with a training certificate.

Staff should be provided with further information about new equipment, exposure regimens etc. as it becomes available and should attend an update training course<sup>16</sup> at least once every 5 years<sup>17</sup>. The content of this course should cover ground similar to that of the initial course with an emphasis on providing the most up-to-date relevant information on health and safety.

All staff training certificates should be displayed prominently in a public area of the tanning premises.

#### 2.2.5 **Provision of information and advice to customers**

It is essential that all customers are informed as to the possible risks of artificial tanning. This information should be provided orally to the customer by an appropriately trained member of staff and should be summarised on notices that are clearly visible and readable; an example information notice is provided in Appendix B.

Notice(s) should be clearly displayed within the immediate view of every customer entering the premises, in waiting areas and in each tanning cubicle.

#### 2.2.6 Customer information/consent form

Before beginning a tanning course of one or more exposure sessions, an information /consent form should be provided by the premises' management to the customer<sup>18</sup>. This will ensure that the customer has the opportunity to understand and consider the risks associated with artificial tanning.

The tanning premises' management should further ensure that the customer signs and dates the form and returns it before commencing the first tanning session. A copy of the signed and dated form should be provided to the customer.

Where decided by the relevant public authority, tanning should not be provided without completion of the consent form<sup>19</sup>.

Original signed and dated forms should be filed in the records of the tanning premises. The forms should be open to inspection as stated below<sup>20</sup>.

<sup>&</sup>lt;sup>15</sup> As appropriate to the country and community in question.

<sup>&</sup>lt;sup>16</sup> EURO*SKIN* suggests that this course should be around 5 hours in duration.

<sup>&</sup>lt;sup>17</sup> EUROSKIN suggests that 5 years is appropriate as long as re-examination is carried out.

<sup>&</sup>lt;sup>18</sup> An example of such a form is provided by WHO (WHO, 2003).

<sup>&</sup>lt;sup>19</sup> EURO*SKIN* recognises that in some countries, the public authority may wish to limit the use of the form to confirmation of the provision of information by the premises' management to the customer. While in others the public authority may wish to use its completion as a requirement for the provision of tanning.

<sup>&</sup>lt;sup>20</sup> EURO*SKIN* recognises that the recording and storage of such forms and other individually identifiable information will be subject to the requirements of national data protection laws.

# 2.2.7 Customer's personal tanning exposure schedule

Before beginning a tanning course, the tanning premises' management should provide the customer with a written personal schedule of tanning exposure. The schedule should be based on the individual customer's UVR skin sensitivity and should be adapted to the specific tanning equipment being used<sup>21</sup>. To limit the risk of unexpected adverse effects (such as photosensitive disorders, photo-allergic and phototoxic effects or other diseases) caused or deteriorated by UVR, the first exposure should be limited to 1 SED on the skin.

# 2.2.8 Additional requirements for the operation of tanning premises

Hygiene in tanning premises includes disinfecting tanning beds after every use as well as cleanliness of the whole premises according to a cleaning plan that should be posted in each cubicle.

Any adverse reactions or injury sustained by customers on the premises should be recorded by the management and filed in the records of the tanning premises together with details of remedial actions taken<sup>22</sup>.

The promotion and/or sale on the premises of tanning starter, accelerator or enhancing products would be in non-compliance with the Code of Practice.

Claims or publicity of beneficial health effects of UVR tanning sessions would be in noncompliance with the Code of Practice.

<sup>&</sup>lt;sup>21</sup> Depending on the requirements of the public authority, the schedule might also include a record of all tanning sessions undertaken and updated after each one. It might also include a record of the cumulative standard erythemal exposure received by the customer against which the advisability of allowing further exposure might be judged and/or regulated by the public authority. Currently EN 60335 (EN 2003) recommends 15 kJ m<sup>-2</sup> (erythemally weighted) as an upper annual bound on exposure.
<sup>22</sup> In some communities, there may also be a legal obligation to inform a relevant public authority.

# Appendix A Recommendations for Regulations

The following are proposed as appropriate to formulating and enforcing regulations by relevant public authorities<sup>23</sup>.

#### A1 Inspections

Tanning premises should be subject to periodic inspection and other relevant controls by the relevant public authority or by its authorised inspecting agent. Inspections should be carried out without giving prior notice to the tanning premises and not less frequently than once every  $X^{24}$  months.

Inspection can be kept simple by assessment of compliance against items set out in a check-list.

#### Hygiene

Inspections should be carried out that address the following areas of control:

- Adequacy of cleaning procedures and recording and public display of cleaning schedules.
- Appropriateness of cleaning products used.<sup>25</sup>
- Cleanliness of the tanning appliances and generally of the premises.
- Cleanliness of the changing areas, the showers, towels etc.

#### Ventilation

- Adequacy of provision of fresh air to the customer while tanning.
- Status of the ventilation system and filters.
- Protection of the customer from contact with any moving parts.

#### Optical components

- The presence of optical components (UVR lamps, filters, reflectors etc.) either installed originally as part of the tanning system or declared as equivalent in operation to original components, as well as their safety status.
- The mechanical protection of lamps.

<sup>&</sup>lt;sup>23</sup> The Code of Practice is not intended to be a regulation. However, the EC and national and/or local authorities may wish to consider incorporating elements of it for developing regulations. To this end, recommendations relevant to official inspection, reporting etc. are provided here.

<sup>&</sup>lt;sup>24</sup> As decided by the relevant public authority.

<sup>&</sup>lt;sup>25</sup> In the choice of cleaning products, reference should be made to national recommended products where such information exists.

- Verification of the UVR class (type 3) of the equipment (lamps, filters and reflectors) according to EN 60335-2-27, using appropriate calibrated measurement equipment.
- Adequate cooling of lamps and electrical components.
- The recorded ages of lamps, history of use and replacement schedules.

#### Electrical safety<sup>26</sup>

- Prevention of direct contact with 'electrically alive' components, double insulation.
- The safety of electrical grounding.
- The operation of remote electric shock protection (circuit breakers).

#### Inspections - Tanning equipment timers

- Adequacy of timer, exposure limiting programmes and power controls.
- Mechanical security of timers and exposure limiting devices.
- Quality of installation of timers and exposure limiting devices.
- Wear and tear on moving parts.
- General mechanical stability.

#### Inspections - Eye protection

• Supply to each customer eye protectors complying with the requirements of EN 60335-2-27 and information as to their correct use.

#### Inspections - Customer information poster signs

- The presence of warning notices, containing health and safety information as detailed above, should be clearly displayed within the immediate view of every customer entering the premises and in each tanning cubicle.
- Staff training certificates should be prominently displayed in a public area.
- Mandatory information should be present close to the appliance. "UV radiation may damage the eyes and the skin. Read carefully the instructions. Wear the safety eyewear provided for your protection".
- For bright light sources (luminance greater than 100,000 cd m<sup>-2</sup>), an additional warning notice should be provided "Intense Light Do not stare at the lamps".

<sup>&</sup>lt;sup>26</sup> EURO*SKIN* recognises that electrical wiring in tanning premises and the installation and inspection of electrical equipment will be subject to national and local electrical safety regulations and standards and that these may specify minimum standards of professional expertise for anyone carrying out such inspections. In this and in other health and safety areas, such national regulations should be strictly adhered to in implementing this Code of Practice.

# Other inspections<sup>27</sup>

- Records of customers' information/consent forms (where appropriate).
- Records of any adverse reactions or injury sustained by customers during artificial tanning on the premises.
- Records of number and type as labelled on the tanning appliances.
- Records of reference to replaceable lamps.
- Records of documents relevant to inspections and licensing.
- Evidence and history of training and qualifications of staff.
- Certification of attendance and examined knowledge for an initial training course.
- Certification of updated attendance of training courses<sup>28</sup>.

#### A2 Reporting

If there is any non-compliance with any of the inspection points, then the following two classes of violation should be notified to the public authority.

In addition, any non-compliance that presents an immediate danger to the health and safety of customers or staff should be communicated immediately to the management of the premises so that remedial action can be taken<sup>29</sup>.

#### Minor violations include

- Minor mechanical anomalies of the tanning appliances.
- Failure of ventilation and temperature control of the booth.
- Only partial information to the public.
- Absence of documents concerning the appliance.
- No updating of personnel training qualifications.

#### Major violations include

- Incomplete declaration of all UVR appliances being used.
- Non conformity with permitted UVR class of appliances.
- Non conformity with safety requirements.
- No public information.

<sup>&</sup>lt;sup>27</sup> EURO*SKIN* recognises that the recording and storage of records and other individually identifiable information will be subject to national data protection laws.

<sup>&</sup>lt;sup>28</sup> As decided by the relevant public authority.

<sup>&</sup>lt;sup>29</sup> In some communities, there may also be a legal obligation to inform a relevant public authority.

- Tanning accelerator products being promoted and/or sold on the premises.
- Absence of qualified personnel.
- Absence of CE marked protective eyewear and/or instructions for correct use.
- Claims or publicity of beneficial health effects of artificial tanning.
- Inadequate hygiene.
- Non-rectified minor violations from a previous inspection
- A3 Compliance and non-compliance

In the case of non-compliance, the relevant public authority should be informed and in turn it should ensure that remedial action is taken. In deciding on what action is required and the time-scale for remedial measures to be implemented, the public authority should consider the nature of the violation, i.e. major or minor as described above.

#### A4 Compilation of statistics

An annual anonymised report, compiled by the relevant public authority would be beneficial for health risk assessment and for the further development of control measures. Such a report might include, for example:

- The number of premises inspected.
- The number of tanning devices inspected.
- The number of compliance certificates issued on first inspection.
- The number and details of minor and major violations.
- The number of premises granted compliance certificates following remedial action.

# Appendix B Example of Information Notice

# YOUR SKIN – You should not use tanning equipment if you:

- have a personal or parental history of skin cancer
  - have sunburn
  - do not normally tan in natural sunlight
  - have a fair skin and get easily sunburnt in natural sunlight
  - have an existing skin complaint
  - have many moles on your body

If in any doubt about your skin seek advice from a medical doctor.

# MEDICATIONS - Some prescription drugs may increase your skin sensitivity If in any doubt seek advice from a medical doctor or pharmacist.

**CONSENT FORM\*** – You are required to read and sign the consent form provided before undertaking tanning in these premises.

**PROTECT YOUR EYES** – Protective goggles are supplied and must be worn at all times while tanning.

**REST YOUR SKIN** – Any exposure to ultraviolet radiation, either from sunlight or from artificial tanning will increase your risk of developing skin cancer. Therefore rest your skin and tan sparingly to reduce your risk.

**EXISTING MEDICAL CONDITIONS** - Do not use a tanning device to treat an existing medical condition.

#### If in any doubt seek advice from a medical doctor.

**COSMETICS** – Make sure that all cosmetics are removed from your skin before tanning. Do not use tanning starters, accelerators or enhancers on your skin.

**ADVERSE REACTIONS** – If you experience an adverse reaction from using a sunbed then consult a medical doctor as soon as possible.

\*\*EURO*SKIN* recognises that in some countries, the public authority may wish to limit the use of the form to confirmation of the provision of information by the premises' management to the customer. While in others, the public authority may wish to use its completion as a requirement for the provision of tanning.

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