

5 February 2015

Health Committee  
Select Committee Services  
Parliament Buildings  
WELLINGTON 6160

### **Health (Protection) Amendment Bill**

The New Zealand Medical Association (NZMA) wishes to make a written submission on the Health (Protection) Amendment Bill (the Bill).

The NZMA is the country's largest voluntary pan-professional medical organisation with approximately 5,000 members. Our members come from all disciplines within the medical profession and include general practitioners, doctors-in-training, specialists, and medical students. The NZMA aims to provide leadership of the medical profession, and promote professional unity and values, and the health of New Zealanders.

The NZMA welcomes this Bill, which we note is intended to improve the range of measures available to protect the public from the harm associated with some infectious diseases and with artificial UV tanning. We support all three main areas in the Bill regarding infectious diseases, namely: i) additional measures to strengthen contact tracing; ii) increasing the range of infectious diseases that are notifiable; and iii) providing a series of incremental options for the management of individuals with significant infectious diseases whose behaviour puts other people at risk.

We also strongly support the Bill's introduction of a ban on the provision of commercial artificial UV tanning services to people under 18 years of age. Artificial UV tanning is associated with an increased risk of developing skin cancer, and evidence shows that younger people are more vulnerable to this risk.<sup>1</sup> Furthermore, voluntary compliance with guidelines on the provision of commercial UV tanning services is poor.<sup>2</sup>

<sup>1</sup> Lim HW, James WD, Rigel DS, et al. Adverse effects of ultraviolet radiation from the use of indoor tanning equipment: Time to ban the tan. *J Am Acad Dermatol* 2011;64:893–902; Cust AE, Armstrong BK, Goumas C, et al. Sunbed use during

The NZMA has previously endorsed calls by the Cancer Society for mandatory regulations for the indoor tanning industry (eg, ensuring all sunbeds are supervised and not allowing people with the fairest skin types to use them).<sup>3</sup> We note that the Cancer Society is now recommending a complete ban on the use of commercial UV tanning services for cosmetic purposes, in line with the total bans that have come into force across all Australian states following prolonged calls for this step by the Australian Medical Association.

Accordingly, the NZMA is supportive of a complete ban on the use of commercial UV tanning services for cosmetic purposes and we ask that the Committee gives this recommendation serious consideration during its deliberations. Should the legislation not incorporate provisions for a complete ban, then we recommend, as a minimum, the introduction of mandatory standards for commercial UV tanning operators to protect against skin cancer.

Finally, we are supportive of the administrative changes proposed in the Bill, including the inclusion of tuberculosis as a notifiable disease under the Health Act 1956, and the consequent repeal of the Tuberculosis Act 1948.

The NZMA is not seeking an oral presentation on this Bill. We look forward to the progression of this Bill into legislation and welcome the swift enactment of measures that will contribute to reducing skin cancer in New Zealand.

Yours sincerely



Dr Mark Peterson  
NZMA Chair

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adolescence and early adulthood is associated with increased risk of melanoma. Int J Cancer 2011;128: 2425–2435; International Agency for Research on Cancer Working Group on artificial ultraviolet (UV) light and skin cancer. The association of use of sunbeds with cutaneous malignant melanoma and other skin cancers: A systematic review. Int J Cancer. 2007 Mar 1;120(5):1116–22

<sup>2</sup> Sunbeds. Consumer 29 January 2014. Available from <https://www.consumer.org.nz/articles/sunbeds>

<sup>3</sup> Call for sunbed regulation. March 2012. Available from <http://www.melanoma.org.nz/MelNet/News/Call-for-sunbed-regulation/>