



September 4, 2013

VIA eRulemaking

Attn: Meg Watson, MPH Epidemiologist  
Epidemiology and Applied Research Branch  
Division of Cancer Prevention and Control  
Centers for Disease Prevention  
4770 Buford Highway NE., MS F-76  
Atlanta, GA 30341-3717

**Re: CDC—2013—0014; Preventing Skin Cancer Through Reduction of  
UV Exposure**

To Whom It May Concern:

The Personal Care Products Council<sup>1</sup> (PCPC) (formerly the Cosmetic, Toiletry, and Fragrance Association) provides these comments in response to the Centers for Disease Control and Prevention (CDC) Notice regarding the opening of a docket to obtain information from the public on preventing skin cancer through the reduction of UV exposure.<sup>2</sup>

We commend the CDC for its efforts to identify opportunities and actions that can be taken by entities, including industry, to reduce exposure to UV radiation by raising awareness of proper UV avoidance practices.

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<sup>1</sup> Based in Washington, D.C., the Council is the leading national trade association representing the global cosmetic and personal care products industry. Founded in 1894, the Council's more than 600 member companies manufacture, distribute, and supply the vast majority of finished personal care products marketed in the U.S. As the makers of a diverse range of products that millions of consumers rely on everyday, from sunscreens, toothpaste and shampoo to moisturizer, lipstick and fragrance, personal care products companies are global leaders committed to product safety, quality and innovation.

<sup>2</sup> 78 Fed. Reg. 150 at 47320 (August 5, 2013). The information obtained will be used for an anticipated Office of the Surgeon General response to the public health problem of skin cancer.

We understand that raising awareness and reducing UV exposure on a national level involves a number of entities, with experience and expertise in a variety of areas. As manufacturers<sup>3</sup> and marketers of sunscreen products,<sup>4</sup> we would like to provide you with information from our perspective to help further the CDC and Surgeon General's efforts in the fight against skin cancer.

**We believe individuals of all ages<sup>5</sup> and skin tones should use sunscreens every day as part of an overall safe sun regimen<sup>6</sup> to reduce the risk of UV damage, including premature skin aging and skin cancer.**

Individual sunscreen brands communicate skin cancer prevention messages through national and local advertising, social media, event sponsorship, health fairs, athletic sponsorships, etc. In addition, a majority of these brands work collectively, through the PCPC, to promote skin cancer prevention on behalf of our industry as a whole in a number of ways, including:

1. Advocate for Skin Cancer Prevention Indication on Sunscreen Labels

For more than 25 years, the PCPC has been actively engaged with the U.S. Food and Drug Administration (FDA) in a number of sunscreen related rulemakings. We have provided large volumes of data and information supporting the safety and efficacy of sunscreens, including their ability to reduce the risk of skin cancer when used as part of an overall safe sun program. In FDA's 2011 final sunscreen rule, the Agency, for the first time, permitted companies to communicate the skin cancer prevention benefits that sunscreens provide when used as part of an overall sun safe regimen.<sup>7</sup> We applaud FDA for this, as product labels are a

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<sup>3</sup> Approximately 364 sunscreen manufacturers.

<sup>4</sup> Over 4,528 sunscreen SKUs.

<sup>5</sup> Ask doctor for under six months of age.

<sup>6</sup> Overall sun safe regimen includes regular use of sunscreen, limiting time in the sun, wearing long-sleeve shirts, pants, hats, and sunglasses.

<sup>7</sup> Sunscreens labeled with an SPF of 15 or higher and Broad Spectrum.

primary source of information for the public. Appendix I contains information summarizing FDA's 2011 final sunscreen rule and other sunscreen related rulemakings.

2. Increase Public Understanding of Sunscreens

Sunscreen products have evolved tremendously over the past several years. Today, sunscreen protection is available in many forms: not only in lotions and sprays, but also in daily use moisturizers, primers, and makeups such as foundations, powders, and lipsticks. Nevertheless, much of the public is unaware that SPF protection is available beyond traditional "beach" sunscreens.

In response, we created a video series, entitled Skin Smart™ to help educate the public about issues related to cosmetics and personal care products. The first episode of Skin Smart is dedicated to helping consumers understand the new sunscreen labeling as well as the plethora of daily use products that, in fact, are sunscreens (e.g., foundations with SPF):

[http://www.youtube.com/watch?v=U\\_QAPAV2NaA](http://www.youtube.com/watch?v=U_QAPAV2NaA)

3. Increase Public's Understanding About the Dangers of Both "Beach" and Daily/Incidental Sun Exposure

Many people are well aware of the burning effects of UV radiation. However, we believe that it is important for the public to understand the damage that everyday sun exposure can cause to individuals of all skin tones.

To help build awareness of the dangers of everyday UV exposure, we created a second Skin Smart™ episode to demonstrate how the sun's rays damage our skin – premature skin aging and skin cancer – as well as to present new innovations in the area of skin cancer detection:

[https://www.youtube.com/watch?v=Y8G5bR5GupI&feature=player\\_embedded](https://www.youtube.com/watch?v=Y8G5bR5GupI&feature=player_embedded)

4. Create a Forum for Communication with the Dermatology Community

Over the past five years, we have held a number of educational workshops with key opinion leaders in dermatology where sunscreen experts from industry and leading dermatologists with expertise in photobiology could discuss and exchange important information

regarding sunscreens. These workshops have provided a highly effective forum for understanding sunscreens and sun protection from many different perspectives – photobiology, regulatory, cosmetic chemistry, clinical experience, etc.

We would also like to acknowledge the most commendable work of the American Academy of Dermatology (*e.g.*, SPOT Skin Cancer: <http://www.aad.org/spot-skin-cancer>; and Sunscreen FAQs: <http://www.aad.org/media-resources/stats-and-facts/prevention-and-care/sunscreens>), the Skin Cancer Foundation (*e.g.*, Go With Your Own Glow: <http://www.skincancer.org/healthy-lifestyle/go-with-your-own-glow>), and others who are committed to the fight against skin cancer.

As we continue to advocate for sound science, we look forward to participating in CDC and the Surgeon General's efforts to prevent skin cancer and save lives.

For further information or should you have any questions, please feel free to contact me.

Sincerely,



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