



Consumer NZ performed a survey of NZ sunbed operators for the Ministry of Health in September 2010. Operators around the country were 'mystery shopped' to test compliance with some of the guidelines set out in AS/NZS 2635:2008. The 2 areas of review and the 7 sub-criteria are explained below.

(It is important to note Consumer did not attempt to test compliance with all parts of the Standard. Every operator should therefore be familiar with its total contents to ensure they are compliant, or if they are not compliant (by choice)- this is noted and clients are informed.)

Review Area 1: PRACTICES

Criteria 1: Skin Assessment

A skin assessment should be performed with each new client (clause 3.6.2). The standard skin assessment measurement follows the widely used 'Fitzpatrick' skin typing tool. While the measurement tool itself is not included with the Standard, the definitions are (clause 1.5.6). These are:

Skin Photo Type I- always burns, never tans (pale white skin).

- *Skin types I should not be allowed to tan at your facility (clause 3.1.3)*

Skin Photo Type II- always burns easily, tans minimally (white skin).

Skin Photo Type III- burns moderately, tans uniformly (light brown skin).

Skin Photo Type IV- burns minimally, always tans well (moderate brown skin).

Skin Photo Type V- rarely burns, tans profusely (dark brown skin).

Skin Photo Type VI- never burns (deeply pigmented dark brown to black skin).

An assessment questionnaire form should be completed in order to assess skin type (this should not just be guessed by the look of the skin). One of these forms is usually provided by your supplier or equipment provider. If you do not have a skin assessment form, please contact INTANZ for a free copy.

Criteria 2: Consent Form

The client consent form reviews some of the risks of excessive ultraviolet radiation (UVR) exposure and contains warnings for high-risk groups. It should be given to a new client to read and sign before any tanning sessions begin. It also contains a client guarantee of their proof of age (over 18). While these guidelines are not legislated for (i.e it is not against the law to provide tanning services to people under the age of 18) then INTANZ advises there is no need to ask for ID to prove age. (As long as a client is prepared to sign the form declaring they are 18 or over, the onus is on them if this subsequently proves to be a lie.)

Copies of consent forms should be kept for 2 years. The Standard contains a consent form which is not subject to copyright and can be reproduced for free. The Standard also suggests clients be given a copy of the form after it's completed. INTANZ believes this is an unnecessary and cumbersome step for the sunbed operator, so we advise you to give each client the option,

should they choose it, of being given a copy that day (or some time afterward, depending on your resources).

Criteria 3: Eye Protection

Appropriate eyewear must be provided for all clients and all sessions (clause 3.2). If eyewear is to be shared between clients, it must be disinfected between each use (clause 3.3). UV eye protection in a variety of styles is available from your preferred sunbed supplier.

INTANZ notes the wording of several parts of the Standard is inappropriate with regard to the tanning operator's responsibility to ensure eyewear is worn. As the tanning session is taken in private, the operator's ability to ensure eyewear is worn is limited. However, any tanning operator in charge of your equipment should make every effort to encourage clients to wear eye protection, and to inform clients of the dangers of not doing so.

Criteria 4: Follow-Up Session

Part of the warnings recommended by the Standard is that "intentional exposure to sunlight or indoor tanning unit exposure should be avoided for 48 hours" after the sunbed session (clause 3.6.1e). Clients should be warned not to have a subsequent tanning session until the day following the next day.

INTANZ advises that 24-48 hours is a sufficient lapse of time between UVR exposures, but to be compliant with the intent of the Standard, clients should be told not to re-visit your facility for 48 hours.

Review Area 2: WARNINGS

A warning notice should be placed inside each tanning booth or room as stipulated by the Standard, warning of the risks of UVR exposure (clause 3.6.1a,b,c). These include:

(Criteria 5: UV Risks)

- (a) Tanning units emit ultraviolet radiation.
- (b) Exposure to ultraviolet radiation contributes to skin cancer and skin ageing.
- (c) Repeated exposure further increases risk.

(Criteria 6: High-Risk Groups)

- (d) People with fair skin who burn easily will not be permitted to use a tanning unit.
- (g) No person under the age of 18 years is permitted to use a tanning unit.

(Criteria 7: All Warnings)

- (e) Further intentional exposure to sunlight or tanning unit must be avoided for the next 48 hours.
- (f) Protective eyewear must be worn at all times while undergoing tanning unit exposure.

INTANZ notes if an operator is compliant with Criteria 1 and 2 then the requirement to display high-risk groups warnings is redundant. (This was agreed by Consumer NZ in a post-survey communication.) Further, INTANZ recommends a change from the words 'exposure' to 'over-exposure' for (b) and (c) in the interests of accuracy.

For a copy of the standard Warning Notice please contact INTANZ.