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25 May 2021

Committee Secretariat
Health Committee
New Zealand Parliament

Online submission via website: www.parliament.nz

Tēnā koe

Sunscreen (Product Safety Standard) Bill

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to make a written submission on the Sunscreen (Product Safety Standard) Bill.

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 51,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes of all people of Aotearoa New Zealand through influencing health, employment, and social policy development.

Furthermore, we share the intent of the Ministry of Health's definition of equity which equally applies to NZNO work across professional, industrial and member activities.

NZNO has consulted its members and staff in the preparation of this submission.

While, New Zealand and Australia have a shared sunscreen standard, which specifies testing methods for sunscreens, as well as labelling requirements, compliance is voluntary. Therefore, the NZNO supports the proposed Bill that will set a mandatory regulation under section 29 of the Fair Trading Act 1986, prescribing a product safety standard for sunscreen products.

NZNO acknowledges that New Zealand has one of the highest rates of skin cancer and melanoma in the world and it is unacceptable that sunscreen products here are not already subject to mandatory regulations.

NZNO also agrees that any claims made about sun protection need to be substantiated. If the Sun Protection Factor (SPF) is on the product, then it must be correct.

We would also recommend that there are clear instructions on the use of and frequency of reapplication of sunscreen on the container.



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Thank you for the opportunity to participate in the consultation process.

Please note that we do not wish to make an oral submission.

A handwritten signature in blue ink that reads "Lucia Bercinkas". The signature is written in a cursive style with a large initial 'L'.

Nāku noa nā

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