



## Consultation on a proposed exposure model for assessing the safety of sunscreen ingredients in Australia

In August 2024, Cancer Council Australia submitted to the Therapeutic Goods Administration (TGA) consultation on a proposed exposure model for assessing the safety of sunscreen ingredients in Australia.

The TGA provided three options for consideration. Cancer Council recommended that the TGA implement option 1, the Australian Sunscreen Exposure Model (ASEM). This model calculates the highest estimated daily sunscreen exposure, by integrated current expected sunscreen application, with evidence-based Australian recommendations and research. Whilst Cancer Council was supportive of this option, we noted that the proposed scenarios portrayed the ideal rather than the reality regarding sun protection clothing used, and that the scenarios should allow for shorter clothing, and therefore increased sunscreen use. Further, Option 1 should consider lifetime, as opposed to annual sunscreen usage, and consider extreme and/or above average temperatures.

Cancer Council were not supportive of either Options 2 or 3. We believed that the Scientific Committee on Consumer Safety (SCCS) exposure model calculations were limiting and failed to require sufficient SPF application, and that maintaining the status quo is not appropriate, as the current approach has resulted in regulatory inconsistencies which have led to confusion and uncertainty. Cancer Council supported that the implementation of Option 1 will help provide a solution to this issue.

Further information on the consultation can be found on the TGA's [consultation hub](#).