March 23, 2018

The Honorable Johnny Isakson (R-GA)  
The Honorable Bob Casey (D-PA)  
U.S. Senate  
U.S. Senate  
131 Russell Senate Building  
393 Russell Senate Building  
Washington, D.C. 20510  
Washington, D.C. 20510

Dear Senators Isakson and Casey:

On behalf of the more than 13,800 members of the American Academy of Dermatology Association (Academy), I write to provide comments regarding Section 103. Conforming Amendments to the Sunscreen Innovation Act of S. 2315, the “Over-the-Counter (OTC) Drug Safety, Innovation, and Reform Act.” Dermatologists diagnose and treat more than 3,000 diseases, including skin cancer, psoriasis, immunologic diseases and many genetic disorders. One in four Americans suffers from a skin disease. As dermatologists on the front lines fighting skin cancer and treating numerous skin diseases, the Academy commends your continued leadership and commitment to ensuring Americans have access to safe and effective sunscreen ingredients.

The Academy appreciates your efforts to conform sunscreen regulation as part of the larger OTC monograph reform effort. We are pleased Section 103 provides flexibility for review of sunscreen ingredients with pending orders, while streamlining the review and approval process for new ingredient applications in the proposed new monograph system.

In order to promote sun-safe behavior and skin cancer prevention, the Academy strongly supports the introduction of new sunscreen ingredients that are safe and effective, while also maintaining access to current sunscreen ingredients. Since enactment of the Sunscreen Innovation Act in 2014, the Academy, along with fellow stakeholders and industry, has engaged with the Food and Drug Administration (FDA) to discuss our shared interest in promoting access to new sunscreen ingredients and products. In May 2016, Academy leadership and staff met with the FDA to discuss the then-proposed and now-finalized safety and effectiveness guidance on sunscreen ingredient safety and effectiveness data. The FDA has not approved a new UV filter in nearly 20 years. However, the Academy remains hopeful that American consumers may soon benefit from new and advanced long-range UVA filters, many of which are already available to consumers in other countries.

The Academy shares your disappointment in the slow progress to bring new sunscreen ingredients to market in the U.S. The Academy agrees sunscreen must be safe and effective. While the Academy does not have a position on the specific standards used to evaluate sunscreen ingredients and formulations, the public health benefits of sunscreen and the importance of sunscreen in preventing skin cancer should be carefully considered.
Thank you again for your leadership in the fight against skin cancer. Please feel free to contact Christine O’Connor, the Academy’s Associate Director, Congressional Policy at coconnor@aad.org or (202) 609-6330 if you have any questions or if we can provide additional information.

Sincerely,

Suzanne Olbricht, MD, FAAD
President
American Academy of Dermatology Association