April 18, 2018

Members of the Hawaii House of Representatives and Senate
Hawaii State Capitol
Honolulu, HI 96813

Dear Members of the Hawaii House of Representatives and Senate:

On behalf of the Hawaii Dermatological Society and the more than 13,800 U.S. members of the American Academy of Dermatology Association, we write to share our thoughts on SB 2571 SD2, which would prohibit the sale and distribution in Hawaii of ultraviolet sun protection factor sunscreen personal care products containing oxybenzone and octinoxate without a prescription. As dermatologists, we dedicate our lives to promoting habits in our patients that ensure healthy skin. Ultraviolet radiation damages the skin’s DNA, which is the beginning stage of skin cancer. We are concerned about policies that would remove access to sunscreens containing oxybenzone, a necessary ingredient for broad-spectrum sunscreens, thereby putting the public at increased risk of developing skin cancer. We urge you and your colleagues to strongly consider the broad implications of banning oxybenzone sunscreens, and bear in mind the dangers of sun exposure without adequate protection that Hawaii residents and visitors would face.

While multiple factors are contributing to the damage of our beautiful planet, the current scientific evidence on the effects of oxybenzone on coral reefs is not sufficient to establish a link. The only study claiming oxybenzone could be harmful to coral is based upon laboratory research, which does not accurately
simulate the complex natural marine environment. According to a recent review of the ecological risks of oxybenzone, systematic monitoring and thorough toxicological studies are needed to better understand the risks of this ingredient in the aquatic environment. The National Oceanic and Atmospheric Administration (NOAA) cites increased ocean temperatures, storm-generated runoff, overexposure to sunlight, and extremely low tides as contributors to the problem of coral bleaching. The Great Barrier Reef Marine Park Authority of Australia conducted a study in 2016 that not only reported coral bleaching in remote areas unfrequented by human contact, but also points to rising ocean temperatures as the main suspected cause.

Oxybenzone is one of the few FDA-approved sunscreen ingredients that provides broad-spectrum protection from the sun’s harmful UVA and UVB rays. UVA damages deeper layers of the skin and contributes to the development of melanoma, the deadliest form of skin cancer. UVB is the primary cause of sunburn and plays a key role in the development of skin cancer in the skin’s more superficial layers. In addition, both types of rays can cause suppression of the immune system.

Unprotected sun exposure is the most preventable risk factor for skin cancer. According to current estimates, at least one in five Americans will develop skin cancer in their lifetime. Melanoma, the deadliest form of skin cancer, is now the second most common form of cancer for females aged 15-29 years old, and Caucasian men over 50 years of age are at a higher risk of developing melanoma than the general population. In Hawaii alone, 490 new cases of melanoma will be diagnosed in 2018. Further, Hawaii has the highest rate of new melanoma diagnoses in the United States among...

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Caucasians and the rate of new melanoma diagnoses among Caucasians is nearly triple the national average. Melanoma has the third fastest rising death rate among cancers in Hawaii, and the death rate from melanoma in Hawaii is more than 30% higher than the national average.¹³

Dermatologists have an interest in patient and public access to safe and effective sunscreen ingredients. The U.S. Food and Drug Administration (FDA) is currently considering eight time-and-extent applications (TEAs) for new sunscreen ingredients to be added to the FDA over-the-counter (OTC) monograph. This issue highlights the need for new safe and effective ingredients to be introduced in the United States. With the approval of ingredients that utilize alternative UV filters available to sunscreen manufacturers, the public’s health will be protected. Should scientific evidence on the effects of oxybenzone on coral reefs demonstrate a stronger link, concerns about preserving the environment can be allayed.

If Hawaii removes access or attaches stigma to sunscreens containing oxybenzone, an ingredient necessary for broad spectrum protection, the public will be placed at an even greater risk for skin cancer. We urge you and your colleagues to strongly consider this as you deliberate SB 2571 SD2. We appreciate the opportunity to provide written comments on this important public health issue. For further information, please contact Lisa Albany, director of state policy for the AADA, at LAlbany@aad.org or (202) 712-2615.

Sincerely,

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

Rodd H. Takiguchi, MD, FAAD
President
Hawaii Dermatological Society