January 5, 2018

Key West City Commission
1300 White St.
Key West, FL 33040

Dear Members of the Key West City Commission:

On behalf of the more than 13,800 U.S. members of the American Academy of Dermatology Association (AADA), we write regarding Ordinance 18-3253, which would prohibit the sale and distribution in Key West of ultraviolet (UV) sun protection factor (SPF) sunscreen personal care products containing oxybenzone and/or octinoxate without a prescription. As dermatologists, we dedicate our lives to promoting habits in our patients that ensure healthy skin. UV radiation damages the skin’s DNA, which is the beginning stage of skin cancer. We urge you to strongly consider the broad implications of banning sunscreens containing certain ingredients, and bear in mind the dangers of sun exposure without adequate protection that Key West residents and visitors may face.

Oxybenzone has been approved by the U.S. Food and Drug Administration (FDA) as safe for human use since 1978, making it one of the oldest active ingredients in use today. It 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.¹

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.²³ 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.⁴⁵⁶ Florida is expected to rank second in the nation for rate

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¹ Lim HW, James WD, Rigel DS, Maloney ME, Spencer JM, Bhushan R. Adverse effects of ultraviolet radiation from the use of indoor tanning equipment: time to ban the tan. Journal of the American Academy of Dermatology. 2011 Apr 30;64(4):e51-60.
of new melanoma cases, with 7,940 new cases of melanoma expected to be diagnosed in 2018.\textsuperscript{7} Further, the annual cost of treating nonmelanoma skin cancer in the U.S. is estimated at $4.8 billion, while the average annual cost of treating melanoma is estimated at $3.3 billion.\textsuperscript{8} Due to the prevalence of outdoor activities and latitude, a disproportionate amount of such costs is attributed to skin cancer cases in Florida.

To help prevent skin cancer, the AADA recommends a comprehensive sun protection plan that includes seeking shade; wearing protective clothing, including hats and sunglasses; and generously applying a broad-spectrum, water-resistant sunscreen with an SPF of 30 or higher to exposed skin. Those who are concerned about the reported effects of chemical sunscreen ingredients like oxybenzone and octinoxate can opt for a physical sunscreen containing the active ingredients zinc oxide or titanium dioxide.

Dermatologists have an interest in patient and public access to safe and effective sunscreen ingredients. The FDA is currently considering eight time-and-extent applications (TEAs) for new sunscreen ingredients to be added to the FDA over-the-counter (OTC) sunscreen monograph. This issue highlights the urgent 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. AADA will continue to take part in the discussion with the FDA and manufacturers regarding adding new ingredients to the monograph.

Please consider the public safety consequences of removing access or attaching stigma to sunscreens containing certain ingredients. We request that the Commission give the FDA more time to add additional sunscreens for public use. 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

cc: Florida Society of Dermatology and Dermatologic Surgery
