

Dear ■■■

I have read through the consultation paper. Congratulations on the paper. It is well put together and very informative.

I have attached a copy of the paper which I have marked up. The highlights are really just for my own interest in reviewing the paper. There were a couple of very minor typos which I have put in the comment section. Otherwise no major suggested changes from me.

I can't quote your scientific research in relation to the use of sunscreen by high performance athletes, as I do not think that that research exists. I think that scenarios outlined in the Australian sunscreen exposure model are excellent and will be very useful in sports settings.

I have thought about which sports may be represented in the different scenarios and I have listed them below. I should just point out that this comes from my knowledge of sport rather than any specific scientific research.

### **Scenario 1**

Indoor sports such as gymnastics, indoor volleyball and basketball

### **Scenario 2**

Recreational outdoor exercise conducted by 'weekend warriors' where the outdoor exposure is generally not more than 30 minutes to 60 minutes per day.

### **Scenario 3**

Mass participation children's sport that involves prolonged exposure to the sun such as Little Athletics, Nippers (junior surf lifesaving), cricket. Sports such as football codes and netball tend to be played in the winter months and involve less outdoor exposure (playing time usually less than an hour).

### **Scenario 4**

Elite level sports such as rowing, canoe kayak, tennis, track and field, hockey where there is incomplete coverage with sun smart clothing and prolonged UV exposure in hot conditions. The sports tend to have multiple prolonged training sessions per day, often involving deliberate heat training at times of peak UV exposure.

## **Scenario 5**

The classic example of a sporting this scenario would be cricket where there is prolonged outdoor exposure but a high level of compliance with use of sun smart clothing involving broad brimmed hats, long sleeves and long trousers. Orienteering is another outdoor sport where there is high level of compliance with use of sun smart clothing because of potential UV exposure.

## **Scenario 6**

Beach volleyball is a classic example where the International Federation stipulates the clothing that must be worn in competition and has resisted moves to introduce more sun smart apparel. Similarly, elite level swimmers often train in warm crop climate such as Queensland and spend long periods of time exposed to direct sunlight with minimal clothing coverage.

Again, while I don't have scientific research to support my thoughts, I do believe the highest estimated usages described on page 31 are appropriate for sports settings.

In relation to your specific questions below:

### **Assessment of Usage Model:**

Sunscreen is used widely in sports and it is now standard procedure for sports organisations to provide sunscreen to athletes and coaches where there is regular and/or prolonged exposure to UV radiation. The proposed model in the consultation document (option one) does in my opinion accurately reflect the amount of sunscreen that may be expected to be used in sports for both children and adults. I think using the highest estimated daily sunscreen exposure methods is appropriate and will ensure protection for those who are using the same or less.

### **Research insights:**

I have looked at the research literature and there really is not much evidence, specifically related to sport, available to inform or influence your calculations.

### **Consultation Feedback:**

1. The TGA should implement Option 1 by using the highest estimated daily sunscreen exposure for extravagance in ingredient risk assessments. The eight dot points supporting Option 1 make good sense and it is difficult to argue with them.

2. The ASEM scenarios are very useful and I think will provide a very pragmatic means of modelling exposure in sports settings. I am not an expert in the actual amounts of sunscreen used in each application but the assumptions made in this modelling appear pragmatic and I think are useful.

3. I do not have any additional data. I would simply make the comment that in high-performance (elite) sport, there is often a deliberate strategy of training in the hottest part of the day when UV exposure is also likely to be high. The culture in relation to the use or non-use of sun smart clothing varies between different sports. There are some sports that have a high degree of UV exposure where minimal sun smart clothing is used (e.g. beach volleyball, canoe/kayak and rowing).

4. The TGA should not implement Option 2 by using the estimated daily sunscreen exposure used by the SCCS. Australia has a very unique sun exposure environment which is very different to Europe. UV radiation exposure is much less in Europe. There is no point basing Australian sunscreen exposure methods on environments which have significantly different UV exposure risk and significantly different culture in relation to the use of sunscreen and other sun smart practices.

5. Not applicable

6. Option 3 is not supported. The inconsistency and confusion that would be caused by adopting this option would undermine confidence in the process and in any advice that arises from the process.

### **Dissemination to Peak Organisations**

I would not recommend disseminating to individual sports at this time, because those sports are currently completely consumed with the Paris Olympic and Paralympic Games.

Can I suggest that you forward the information to the following organisations:

[Sports Medicine Australia](#)

[Australasian College of Sport & Exercise Physicians](#)

[Australian Physiotherapy Association](#)

Apologies that time constraints have limited the amount of time I can commit to this consultation. Thank you for asking for AIS/ASC input. Written in some haste so apologies for any typos.

Kind regards, David

**Dr David Hughes AM**  
Chief Medical Officer  
Australian Institute of Sport  
**Australian Sports Commission**



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*The Australian Sports Commission pay our respects to the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present, and acknowledge the valuable contribution Aboriginal and Torres Strait Islander people make to Australian society and sport.*