

Health, Wellbeing and Local Government Committee

Committee Inquiry into the use and regulation of sunbeds in Wales – Written evidence from Consol Suncenter

We are writing to submit evidence to the inquiry as the UK's leading tanning business, established nearly thirty years ago and operating 90 out of the 120 coin-operated, partially staffed studios in the UK in an industry recently estimated to be between 7,000.¹

Consol has studios in Blackwood, Cardiff, Swansea, Newport, Llanelli, Pontypridd, Ebbw Vale and Merthyr Tydfil. Consol has been operating in Wales for over ten years.

Consol strongly supports tighter regulation of the sunbed industry and has been campaigning for some time to see the UK adopt an EU Declaration² which limits the emissions of sunbeds to such a low level that any risk of burning on a sunbed is minimal.

However, we have monitored the debate on sunbeds and we are seriously concerned that anecdotal evidence is informing proposals to ban our business concept, which represents **less than two per cent of the sunbed industry**, and that this focus detracts from looking at critical regulation which would immediately impact upon the public's safety whether in a tanning studio, leisure club or even at home.

We would like to address the following areas to be considered by the committee:

- The Use of Sunbeds by Children

We monitor the use of our sunbeds via CCTV in all our studios and via visits by studio managers at least twice a day. We also undertake independent research on a regular basis to assess who is using our studios and to ask customers whether they are aware of young people using our sunbeds. In all instances we do not have **any** evidence that children are using Consol studios.

In the last year, there have been two reported incidences of burning on a sunbed in an unmanned studio in Wales which are very concerning and those particularly studios should be dealt with independently but there are far more anecdotal incidences of children using staffed studios than unstaffed studios and we suspect that children do not use Consol studios because of our CCTV and the random nature of staff and security visits. As we represent the vast

¹ By The Sunbed Association

² 11 SED/h (0.3 W/m²), Irradiance Limits Standard Declaration, as part of the Low Voltage Directive (2006/95/EC)

majority of unmanned studios, any suggestion that children use coin-operated, unmanned studios is not backed by evidence.

- The over use of sunbeds, limiting of sunbed sessions and staffing of studios

For those individuals determined to get a tan, whether a studio is staffed or partially staffed will make no difference, as customers can move from one studio to another, or of more concern, hire a sunbed at home. Turnover of staff in the sunbed industry is also high which means that levels of training and ability to advise customers properly vary widely.

What is critical is the standard of information available to customers, the availability of accurate skin testing and the output of the sunbed equipment to minimise any risk of burning.

Consol provides the highest standard of information to its customers as well as a free, highly accurate, electronic skin tester developed by dermatologists. Our sunbeds automatically switch off after a short period of time to prevent over use and we make it very clear that no customer should take more than 20 sessions per annum. Consol is also the only company in the UK to comply with the EU Declaration regarding sunbed emissions on **all** of its equipment irrespective of age.

We would welcome the opportunity to provide oral evidence to the committee and finally set the record straight about our business concept as well as make evidence based suggestions for improving standards in the industry rather than anecdotal, non-evidence based proposals which will have no impact on public health in Wales.

18th August 2009