

December 3, 2018

Via Electronic Mail

Members of the Key West City Commission
1300 White Street
Key West, FL 33040

RE: Oppose Ordinance File #18-3253 Amending Chapter 26-Sunscreen

Members of the Key West City Commission:

On behalf of the Personal Care Products Council¹ (PCPC), I am writing to express opposition to ordinance file #18-3253, which prohibits the sale, offer for sale, or distribution of nonprescription SPF sunscreen protection personal care products containing oxybenzone or octinoxate.

Sunscreens are regulated as over-the-counter drugs by the U.S. Food and Drug Administration (FDA). Oxybenzone and octinoxate are **FDA-approved active ingredients** that are critical to the U.S. sunscreen market. Oxybenzone is a broad spectrum sunscreen, absorbing both UVA and UVB rays, that also photostabilizes other sunscreens to provide long lasting protection.

Coral reef degradation is an important environmental issue that we take very seriously. It is also widely understood that coral bleaching is the direct result of climate change. In addition to the governmental agencies and environmental organizations that have identified rising sea temperatures from global warming as the culprit for coral bleaching, several leading academic and private sector researchers and scientists have reached a similar conclusion. For example, the study performed by Professor Terry Hughes, Director of the Australian Research Council Centre of Excellence for Coral Reef Studies at James Cook University (2017) concluded that water quality had little effect on the coral reefs, pointing instead to rising sea temperatures from global warming as the cause of coral bleaching. In another *Nature* paper, researchers concluded that local population density is not correlated to coral reef decline and that only concerted global action to reduce ocean temperatures can reverse coral reef decline. Professor Terry Hughes reaffirmed these conclusions in a January 2018 article in *The New York Times*, stating that

¹ Based in Washington, D.C., PCPC is the leading national trade association for the global cosmetic and personal care products industry. Founded in 1894, PCPC's more than 600 member companies manufacture, distribute, and supply the vast majority of finished personal care products marketed in the United States. As the makers of a diverse range of products that millions of consumers rely on every day, from sunscreens, toothpaste, and shampoo to moisturizer, lipstick, and fragrance, member companies are global leaders committed to product safety, quality, and innovation.

“coral bleaching is caused by global warming full stop.” In a separate article published by *Mashable* in 2015, Professor Hughes suggested that extrapolations asserting sunscreen is damaging the world’s coral “are a bit of a stretch”, and “the conclusion from the media is sunscreen is killing the world’s coral, and that’s laughable.”

Further, as indicated by the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Centre, global coral mass bleaching is caused by rising water temperatures associated with climate change. According to UNESCO, bleaching and mortality of corals due to heat stress, resulting from global warming and observed over the past three decades, is expected to continue and intensify in the coming decades unless CO₂ emissions are drastically reduced. Similarly, the U.S. Environmental Protection Agency (EPA), together with the U.S. Coral Reef Task Force (USCRTF), have indicated that climate change and ocean acidification due to CO₂ absorption present intense global threats to coral reefs.

Recent research, like the *He et al.* study (2018), underscores that conclusions should not be drawn from the study performed by Dr. Craig Downs. Importantly, biomonitoring data from a coral study led by Dr. Carys Mitchelmore, University of Maryland Center for Environmental Sciences found oxybenzone at extremely low concentrations and no quantifiable octinoxate concentrations could be detected. This study was performed through a grant by PCPC to the University of Maryland, and a manuscript outlining this work has been submitted for publication and is currently undergoing peer review. Dr. Mitchelmore’s work is consistent with other recent environmental monitoring studies.

While the coral bleaching events are of great importance, of similar great concern is the prevalence of skin cancer diagnoses and deaths. Skin cancer is the most common cancer in the U.S. In fact, more than 10,000 people die of melanoma every year and there are more new cases of skin cancer each year than breast, prostate, lung and colon cancers combined. The U.S. Food and Drug Administration (FDA), the Centers for Disease Control and Prevention (CDC), the U.S. Surgeon General, the American Academy of Dermatology (AAD), the Skin Cancer Foundation and health care professionals worldwide emphasize that using sunscreens is a critical part of a safe sun regimen. The dangers of sun exposure are clear and universally recognized by public health professionals and dermatologists. The National Institutes of Health Report on Carcinogens identifies solar UV radiation as a ‘known human carcinogen.’ A single bad burn in childhood greatly increases the risk of developing skin cancer later in life. The risk of skin cancer without sunscreen is proven, and a ban on sunscreen would create a serious public health problem.

Ordinance File #18-3253, although well intended, lacks the necessary scientific evidence to demonstrate that these sunscreen ingredients are responsible for coral bleaching. We fear this legislation will create confusion, put consumers’ health at risk and potentially discourage the use of sunscreens – an important part of a safe sun regimen.

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We would appreciate the opportunity to make a thorough and detailed presentation during your January 2, 2019 meeting. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Lezlee Westine". The signature is written in black ink on a light-colored background.

Lezlee Westine
President and CEO

Cc:
Cheri Smith, City Clerk
Mayor Teri Johnston