



An Roinn Sláinte
Department of Health

Sunbeds Public Consultation

Report

July 2026

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1. Abbreviations

CPAC - Cancer Patients Advisory Committee

DoH - Department of Health

EHA - Environmental Health Association of Ireland

ESA - European Sunlight Association

EU - European Union

FOI - Freedom of information

GDPR - General Data Protection Regulation

GP - General Practitioner

Health Worker - Health Sector Worker

HSE - Health Service Executive

IARC - International Agency for Research on Cancer

ICS - Irish Cancer Society

Industry - owners, employees or entities with a commercial interest in the manufacture, distribution, import of sale/use of sunbeds

IP address - Internet Protocol Address

IPH - All Ireland Institute of Public Health

ISF - Irish Skin Foundation

NGO - representatives of public health bodies, advocacy groups, NGO's (Non-Governmental Organisation) or medical organisations

PfG - Programme for Government

PPTRC - Pavee Point Traveller and Roma Centre

Public – Members of the public

SPF – Sun Protection Factor

Sunbeds Public Consultation – Public Consultation on a potential ban on commercial sunbed use in Ireland

TSA - The Sunbed Association

UV - Ultraviolet

WHO - World Health Organisation

2. Executive Summary

In order to progress the commitment in the 2025 Programme for Government to explore ways to ban commercial sunbed use, the Department of Health (DoH) undertook a public consultation to inform future policy options on commercial sunbed use in Ireland (Sunbeds Public Consultation). A total of 9,320 survey responses from residents in Ireland were included in the analysis. Respondents self-assigned to one of five cohorts: Health Worker, Industry, NGO, Public or Other. The majority of respondents self-assigned to the Public cohort, comprising 8,420 respondents, or 90% of survey responses. The remaining respondents self-assigned as Health Worker (517; 6%), Industry (225; 2%), NGO (98; 1%) or Other (60; 1%). In addition, eleven written submissions were received from a health organisation, industry representatives, NGOs, a patient advocacy group, a professional association, and sunbed businesses.

Participation was voluntary and self-selecting; respondents self-assigned their cohort; and the survey sample included a high proportion of current or former sunbed users, with 84% of respondents reporting that they had used a sunbed at some point. Accordingly, the results should not be regarded as statistically representative of the population of Ireland. Notwithstanding these limitations, the consultation provides valuable insight into the issues, concerns and policy considerations relating to a potential ban on commercial sunbed use.

The survey findings indicate that sunbed use was common among respondents. Among those who had ever used a sunbed, the most frequently reported patterns of use were once a week, reported by 30% of respondents, and two to three times per week, reported by 26%. The majority of respondents who had used sunbeds reported that they began using them between the ages of 18 and 24 years, and over 70% reported that they had started before the age of 35 years. The principal reported motivations for sunbed use were feeling better with a tan and preparing for holidays, special occasions or events. Free-text responses also referred to appearance, confidence, mental health, skin conditions and personal choice.

The consultation findings indicate a marked divergence between cohorts on the question of a potential ban on commercial sunbed use. Overall responses indicated opposition to a ban, with 67% strongly disagreeing that they would welcome a ban on commercial sunbed use.

Furthermore, 73% of respondents strongly agreed that adults should be free to make their own health choices; 68% strongly agreeing that a ban on commercial sunbed use would be a step too far. The Health Worker cohort was more supportive of a ban on commercial sunbed use, with 58% strongly agreeing that they would welcome a ban, while the Industry cohort expressed strong opposition, with 88% strongly disagreeing that they would welcome a ban. These differences reflect the varying emphasis placed by respondents on public health protection, personal autonomy, business impact, proportionality and the perceived adequacy of existing regulatory requirements.

While support for a commercial ban on sunbed use was limited among overall survey respondents, there was stronger support for other forms of government action. Increasing awareness of the risks associated with sunbed use was the most widely supported measure and was selected by 76% of respondents overall. Support for banning advertising and marketing of sunbeds was selected by 36% of respondents, while support for banning commercial sunbed use was selected by 22% overall. Free-text responses indicated that, while a number of respondents opposed a ban, they supported stronger enforcement of existing requirements, improved public information, enhanced standards and more targeted regulatory controls.

The consultation provides a substantive basis for further policy development. The findings of this consultation, together with the wider evidence base and relevant legal, economic and public health considerations, will inform future policy development in relation to the use of commercial sunbeds in Ireland.

3. Introduction

Skin cancer is the most common type of cancer in Ireland and is a particular problem for Irish people because of their fair skin (Fitzpatrick Skin Type I and II). There are over 11,000 new cases of skin cancer diagnosed annually in Ireland. The International Agency for Research on Cancer (IARC) has classified UV-emitting tanning devices as ‘carcinogenic’ (Group 1) to humans. Ultraviolet radiation, whether from natural sunlight or artificial sources such as sunbeds, is a well-established, modifiable risk factor for skin cancer. Reducing UV exposure, including avoiding the use of sunbeds, is therefore an important preventive measure.

Programme for Government Commitment

In 2025, the Programme for Government (PfG) ‘Securing Ireland’s Future’, reaffirmed the State’s commitment to strengthening cancer prevention and control. Under its Cancer Care pillar, the Programme included a commitment to explore ways to ban commercial sunbed use in Ireland.

Purpose of this Report

The purpose of this Report is to present the findings of the Sunbeds Public Consultation to the Minister of State Jennifer Murnane O’Connor TD, with special responsibility for Public Health, Well Being and the National Drugs Strategy. It will support the government’s consideration of future policy options regarding sunbed use in Ireland. It presents the responses to the Sunbeds Public Consultation from 5 cohorts: Health Worker, Industry, Members of the Public, Non-Governmental Organisations (NGO) and Other.

The intended audience includes Minister Murnane O’Connor, senior officials in DoH, other relevant Government Departments and agencies, members of the public and other interested parties.

Sunbeds Public Consultation

To progress the commitment in the Programme for Government, Minister Murnane O’Connor launched the online public consultation on 25 July 2025. The Sunbeds Public Consultation ran until 3 October 2025 and sought the views and opinions of the public, industry and other

stakeholders on a potential ban on commercial sunbed use. The Sunbeds Public Consultation was hosted on the EUSurvey platform. The findings of this consultation will inform future policy development in relation to the use of commercial sunbeds in Ireland.

Structure of the Sunbeds Public Consultation Report

This Report is divided into three Sections: A, B and C.

Section A sets out the responses to the Sunbeds Public Consultation from all five cohorts of respondents. This Section sought to assess the awareness of health risks associated with sunbed use, attitudes toward government regulation of sunbeds, views on the acceptability of a ban on commercial sunbed use, and what factors would influence support or opposition to any such ban.

Section B outlines the responses to the Sunbeds Public Consultation from sunbed business operators, those working in sunbed businesses, and others in this industry. This Section sought views from the industry on a potential ban on commercial sunbed use and requested input on what supports businesses may require following the implementation of any such ban.

Section C summarises the emails sent to the dedicated email address for the Sunbeds Public Consultation. The dedicated email address facilitated detailed submissions, and could be used either in isolation from, or in addition to, the Sunbeds Public Consultation survey questions. The list of eleven organisations who provided a written submission is included in Appendix I. Submissions received from ten organisations are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Press Campaign to Promote the Sunbeds Public Consultation

The Department of Health developed a campaign to promote the Sunbeds Public Consultation, asking the public, including sunbed business owners and users, to share their views on a potential ban on commercial sunbed use.

The campaign was supported through the development of an information page on gov.ie, press ads in national publications, paid social media posts, a press release to media publications, organic social across DoH social platforms and internal comms to 700 staff members.



The advertisement is a light blue rectangular graphic with a white triangle at the bottom. The main headline is in large, bold, blue text. Below it, a bold black paragraph invites public participation. A smaller black paragraph follows, explaining the value of the consultation. To the right, contact information is provided in a smaller black font. At the bottom right, the Irish harp logo and the name of the Government of Ireland are displayed.

Have your say on a potential ban on commercial sunbed use in Ireland.

The Department of Health is inviting members of the public, relevant groups and organisations, sunbed business operators, employees and related businesses to share their views on a potential ban on commercial sunbed use in Ireland.

We would particularly like to hear from individuals who use sunbeds and from sunbed business operators. Your views are invaluable in the conversation regarding a potential ban on commercial sunbed use and will inform this public health policy initiative.

Share your views at:
gov.ie/SunbedsPublicConsultation

Or by email at:
sunbeds_public_consultation@health.gov.ie

The consultation will remain open until 5:00pm 3 October 2025.

 Rialtas na hÉireann
Government of Ireland

Figure 1: Press advertisement for the Sunbeds Public Consultation.

4. Sunbeds Public Consultation Data Analysis

The Sunbeds Public Consultation was conducted via an online survey hosted on the EUSurvey platform, open to those who self-assigned into one of a number of cohorts. For the purposes of this Report, the cohorts are identified as follows -

- **Health Worker:** health sector workers,
- **Industry:** owners, employees or entities with a commercial interest in the manufacture, distribution, import or sale/use of sunbeds,
- **NGO:** representatives of public health bodies, advocacy groups, NGO's or medical organisations,
- **Public:** members of the public,
- **Other:** other.

To note, survey respondents self-assigned their cohort, and, due to the anonymised nature of the survey, this information could not be verified. Where appropriate, and to better illustrate comparisons, the data for each of the cohorts is expressed as percentage and rounded to the nearest whole number if required.

Participants were invited to respond to questions regarding their -

- sunbed use,
- where they access sunbeds,
- associations with sunbeds,
- awareness of the health risks of sunbeds,
- views on a potential ban on commercial sunbed use,
- views on how a potential ban would affect individuals using sunbeds or sunbed businesses,
- views on whether they would support certain government policy measures around sunbed use.

Responses to the Sunbeds Public Consultation survey from those respondents who were not a resident of Ireland were not included in the analysis (34). The total number of responses (Overall) to the Sunbeds Public Consultation, excluding those who were not a resident of

Ireland, was 9,320. These responses were sub-divided by cohort, where 517 (6%) of respondents identified as Health Worker, 225 (2%) identified as Industry, 98 (1%) identified as NGO, 8,420 (90%) identified as Public, and 60 (1%) identified as Other. The raw data is available at the following link: <https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Multiple Choice Questions

Section A of the Sunbeds Public Consultation included mainly multiple-choice questions, with some questions including a free text response option. The responses to the multiple-choice questions are presented using bar charts, clustered bar charts, stacked bar charts, and tables, as appropriate. The findings are illustrated with corresponding quotes from the respondents where available (i.e., where the question included a free text option). Where a 5-point scale was used in the multiple choice questions, the responses were interpreted as follows:

- 'Not at all' to 'Very strongly' -
 - 1 - Not at all,
 - 2 – Somewhat,
 - 3 – Neutral,
 - 4 – Strongly,
 - 5 – Very Strongly.
- 'Strongly Disagree' to 'Strongly Agree' -
 - 1 – Strongly Disagree,
 - 2 – Disagree,
 - 3 – Neutral,
 - 4 – Agree,
 - 5 – Strongly Agree.

Free Text Questions

Question 6 in Section A of the Sunbeds Public Consultation required a free text response. The free text responses were reviewed and the main themes identified. Word Clouds, generated by the EUSurvey platform, are included to illustrate the frequency of these themes, and example quotations are included which are representative of the responses received. Due to

the large volume of responses, the quotations included are a sample of the responses received. All responses are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Section B of the Sunbeds Public Consultation contained questions which required a free text response and were directed to participants self-assigning as members of the Industry cohort. The free text responses were reviewed and the main themes identified. Word Clouds, generated by the EUSurvey platform, are included to illustrate the frequency of these themes, and example quotations are included which are representative of the responses received. Due to the large volume of responses, the quotations included are a sample of the responses received. All responses are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Email Submissions

Section C of this Report summarises the submissions from organisations and individuals to the dedicated Public Consultation mailbox. These were free text submissions and were received from a health organisation, industry representatives, NGOs, a patient advocacy group, a professional association, sunbed businesses, and individuals. Summaries of the submissions from eleven organisations are included in this Report, and the full text submissions from ten organisations are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

A summary of submissions from individuals are also included in this Report.

Limitations of the Analysis

This findings of the Sunbeds Public Consultation cannot be taken as statistically representative of the population of Ireland. As this was an online survey, the sample may not reflect real-world population demographics. In this consultation, 84% of respondents reported having ever used a sunbed or being a current sunbed user. In addition, the Public cohort represented the largest cohort, with 90% of respondents self-assigning to this cohort.

It should be noted that a representative group for sunbed business operators posted guidance and key points to include in responses to the Sunbed Public Consultation on its website for both sunbed business operators and the general public.

GDPR Considerations

This Report was prepared based on the responses to the survey and email submissions to the dedicated Public Consultation mailbox. For the survey, IP addresses were retained for the sole purpose of identifying whether a response was generated in Ireland, with only one response being accepted from each IP address.

All responses will be retained until such time as they are appraised by the National Archives to determine whether they warrant permanent retention as archives in accordance with the Department's obligations under the terms of the National Archives Act, 1986. Any personal information submitted to the Department will be treated strictly in accordance with the General Data Protection Regulation 2016/67 and the Data Protection Act 2018.

People can request to see the responses received to the Sunbeds Public Consultation under the Freedom of Information (FOI) Act 2014 and therefore responses may be released in response to an FOI request. This is more likely to happen with responses from organisations. This means that the requestor might get respondents answers to the questionnaire, however, any personal information included in responses will be redacted prior to release.

[Access the department's Privacy Policy.](#)

5. Analysis

Demographics

Question 7.1 - Age

The respondents (n=9,320) selected the following -

- Under 18 years old - 0.72%,
- 18-24 years old - 33%,
- 25-34 years old - 27%,
- 35-44 years old - 22%,
- 45-54 years old - 13%,
- 55-64 years old - 4%,
- 65 years old plus - 1%.

Question 7.2 - Gender

The respondents (n=9,320) identified as the following -

- Female - 86%,
- Male - 12%,
- Non-binary - 0.24%,
- Other - 0.08%,
- Prefer not to say - 0.82%,
- No answer - 0.58%.

Question 7.3 - Ethnic Group/Background

The respondents (n= 9,320) selected the following -

- White Irish - 85%,
- Any other White background - 9%,
- Irish Traveller - 4%,
- Roma, Black Irish, Black African, Any other Black background, Arab, Mixed group/background, Other group/background - 2%,
- No Answer - <0.24%.

5.1. Section A

Your Sunbed Use

Question 3.1: Have you ever used a sunbed? (Select one)

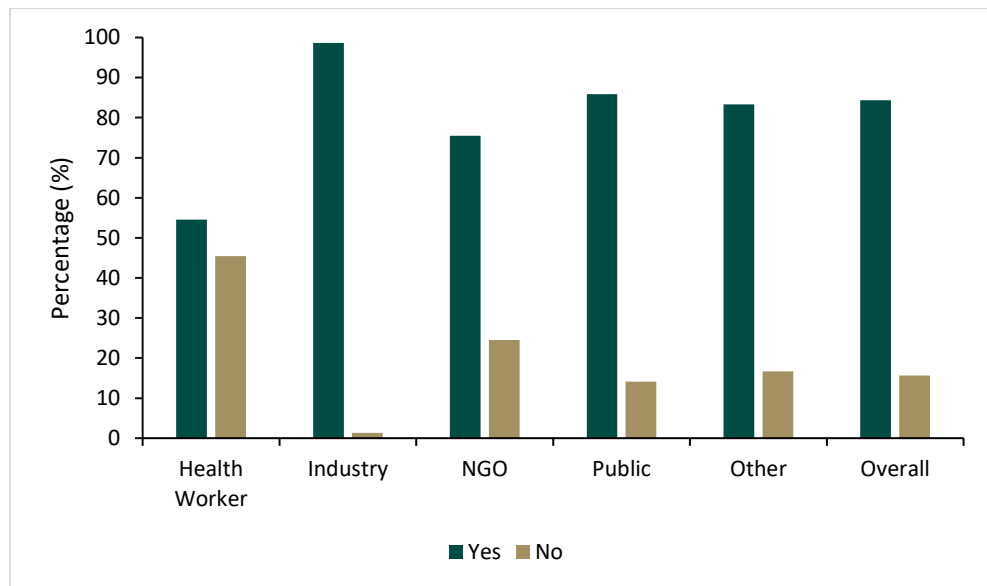


Figure 2: Have you ever used a sunbed? Overall responses and responses by cohort.

Overall, 84% of respondents reported ever using a sunbed. This includes those respondents who reported being current sunbed users and those who previously used sunbeds but do not plan to in the future. The responses on sunbed use demonstrate a difference between the cohorts. For example, 55% of the Health Worker cohort reported ever using a sunbed, compared to 99% of the Industry cohort.

Question 3.2: If yes, how often do you or did you use sunbeds? (Select one)

Table 1: Reported Sunbed Usage.

Response	Answers	Percentage
2-3 times a week	2433	26 %
Once a week	2773	30 %
Every 2 weeks	799	9 %
Every month	394	4 %
Every 2-6 months	283	3 %
Once a year	173	2 %
Before a special occasion	988	11 %
Never	10	<1 %
No Answer	1467	16 %

Of the respondents who have ever used a sunbed, 26% reported using a sunbed two to three times per week. Additionally, 30% of respondents reported using a sunbed once a week. Before a special occasion 11% of respondents reported using a sunbed.

Question 3.3: If yes, at what age did you start to use sunbeds? (Select one)

Table 2: Age at which sunbed use started.

Response	Answers	Percentage
0-18 years old	400	4 %
18-24 years old	4736	51 %
25-34 years old	1770	19 %
35-44 years old	601	7 %
45-54 years old	280	3 %
55-64 years old	55	<1 %
65 years +	10	<1 %
No Answer	1468	16 %

Over half (51%) of respondents who reported ever using a sunbed began using sunbeds between the ages of 18-24 years. Over 70% of respondents began using sunbeds before the age of 35 years.

Question 3.4: What motivated you most to use a sunbed? (Select one)

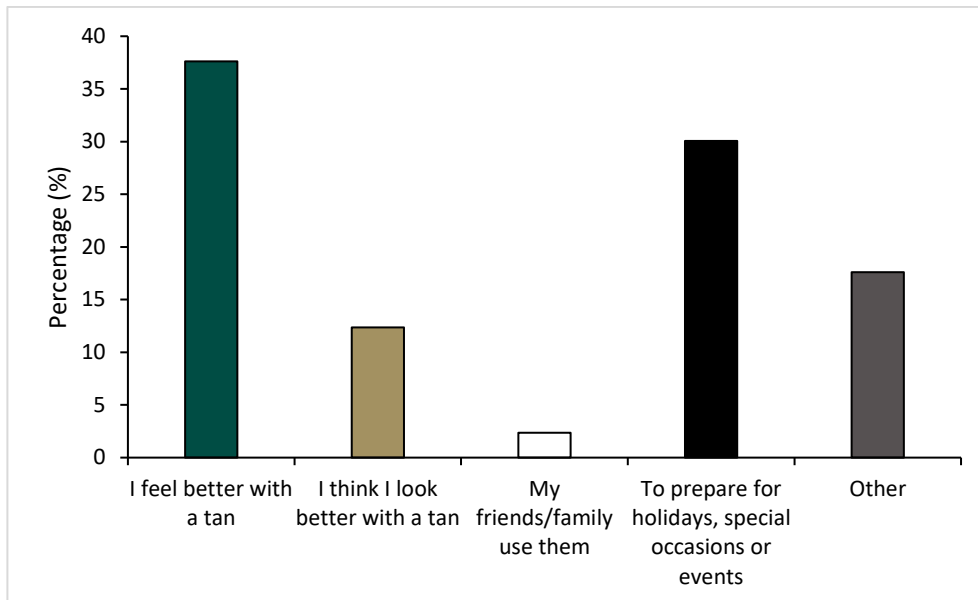


Figure 3: Motivation to use sunbeds.

Of the respondents who have ever used a sunbed, *'I feel better with a tan'* was the strongest motivating factor for sunbed use, followed by *'To prepare for holidays, special occasions or events'*. Below are some examples of comments from respondents who chose *'Other'*, one comment from each cohort -

"It helps with my skin condition.". (Health Worker)

"It's my job and I think that I help more than one person struggling with depression, sadness or muscle problems.". (Industry)

"It helps my mental health when my mood is low and sun levels aren't high.". (NGO)

"Helps with skin conditions.". (Public)

"Helps with my psoriasis.". (Other).

Associations with Sunbeds

Question 4.1: How strongly do you link sunbeds with each of the following?

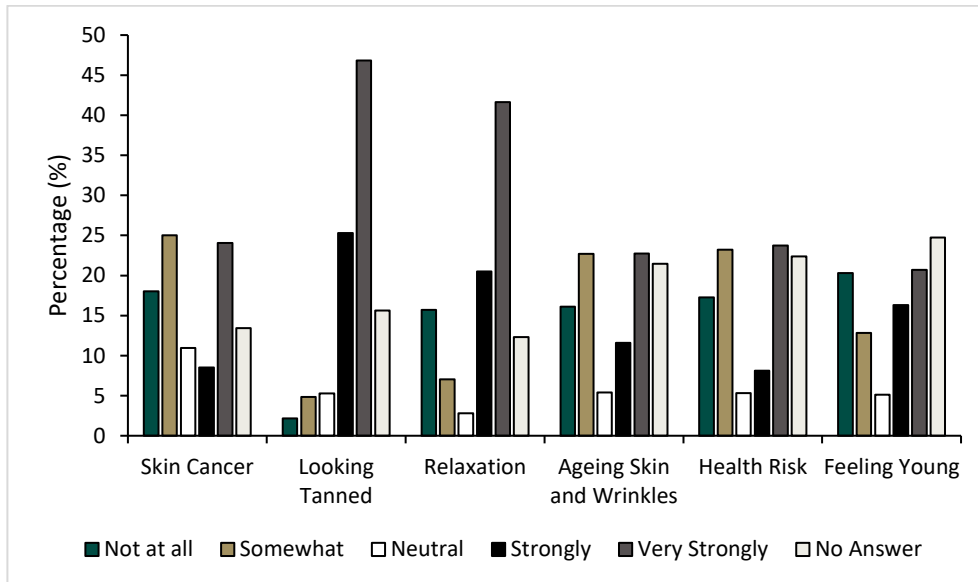


Figure 4: How strongly do you link sunbeds with each of the following?

The bars representing 'Skin Cancer', 'Ageing Skin and Wrinkles', 'Health Risk' and 'Feeling Young' all follow a "U" shape, indicating polarised responses. Respondents have opposing opinions on these variables and how they associate with sunbeds. Notably 'Looking Tanned' and 'Relaxation' are strongly/very strongly associated with sunbeds.

Question 4.2 Imagine a friend says: “Sunbeds are fine if you don’t overdo it.” How much do you agree or disagree?

Table 3: “Sunbeds are fine if you don’t overdo it”. Overall responses and responses by cohort.

Response	Health Worker	Industry	NGO	Public	Other	Overall
1 – Strongly disagree	54%	3%	31%	16%	10%	18%
2 – Disagree	8%	2%	8%	6%	10%	6%
3 – Neutral	2%	5%	3%	4%	3%	4%
4 – Agree	9%	23%	11%	18%	17%	18%
5 – Strongly agree	21%	55%	41%	43%	45%	42%
No answer	6%	12%	6%	13%	15%	13%

Overall, 42% strongly agreed with the statement “*Sunbeds are fine if you don’t overdo it*”. When the Industry cohort was viewed separately, 55% strongly agreed, and 3% strongly disagreed with the statement. Conversely, when the Health Worker cohort was viewed separately, 21% strongly agreed, and 54% strongly disagreed with the statement.

Question 4.3 When you hear “sunbed”, what’s your first reaction? (Select one)

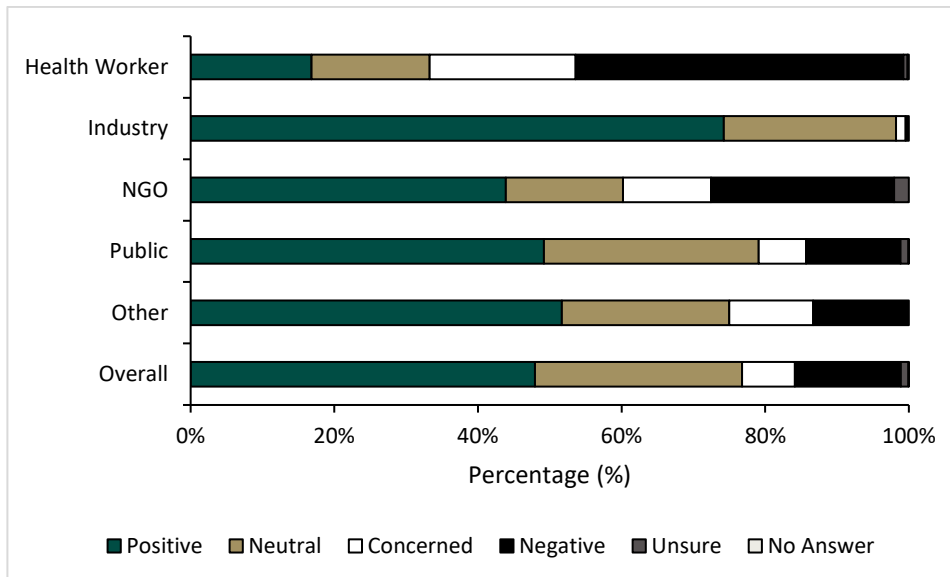


Figure 5: First reaction to hearing “sunbed”. Overall responses and responses by cohort.

The overall result shows that in almost 50% of cases the first reaction to hearing “sunbed” was ‘positive’. When the Industry cohort was viewed separately, 74% reported a ‘positive’ reaction to hearing “sunbed”. Conversely, when the Health Worker cohort was viewed separately, 17% of respondents had a ‘positive’ first reaction to hearing “sunbed”. Overall, 15% chose ‘negative’ as their first reaction, with 0.4% of the Industry cohort and 46% of the Health Worker cohort choosing ‘negative’. This shows that respondents from different cohorts have opposing reactions to hearing “sunbed”.

Question 4.4 How common is sunbed use among people you know? (Select one)

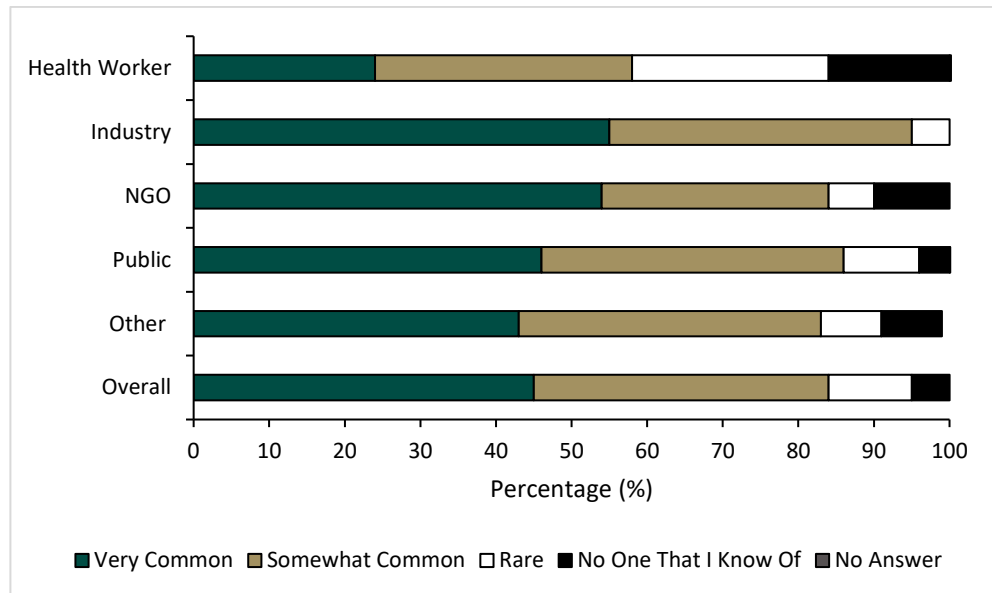


Figure 6: How common is sunbed use among people you know? Overall responses and responses by cohort.

The majority of respondents reported that sunbed use is 'very common' or 'somewhat common' among people they know. When the Healthcare Worker cohort was viewed separately, 24% selected 'very common', and 16% selected 'no one that I know of'. In contrast, when the Industry cohort was viewed separately, 55% selected 'very common' and there were zero responses for 'no one that I know of'.

Question 4.5 - Where do you use sunbeds? (Select all that apply)

Respondents were able to choose multiple options in response to this question. The majority of responses (79%) selected were 'I use sunbeds in tanning shop/salon', while 11% were 'I use sunbeds in beauty salons/gyms'. 'I use a sunbed that my friend/family own or hire' was selected in 3% of responses, with 'I have hired a sunbed for use in my home' selected in 2% of responses, and 'I own a sunbed' selected in 1% of responses. To note, 15% of responses selected 'Other' and the majority of these responses indicated that they did not use a sunbed when filling out the free text option for this response.

Opinion: A Ban on Commercial Sunbed Use

Question 5.1 How strongly do you agree or disagree with the following statements?

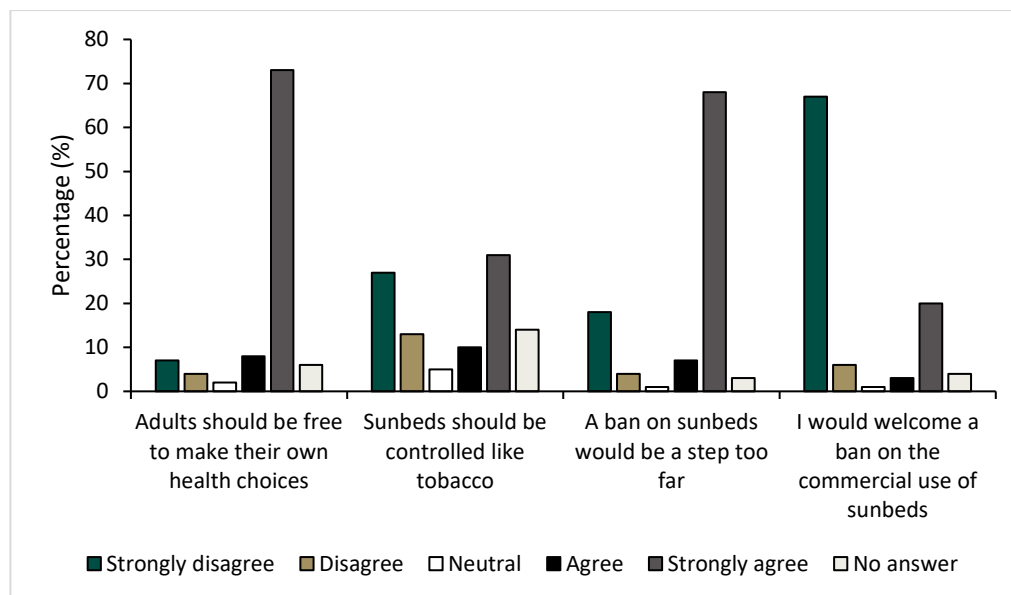


Figure 7: How strongly do you agree or disagree with the following statements? Overall responses.

Overall, 73% of respondents strongly agreed with the statement “*Adults should be free to make their own health choices*”. Furthermore, 68% of respondents strongly agreed that “*A ban on sunbeds would be a step too far*” and 67% of respondents strongly disagreed with the statement “*I would welcome a ban on the commercial use of sunbeds*”.

The responses on “*Sunbeds should be controlled like tobacco*” illustrate opposing viewpoints, with 27% strongly disagreeing with the statement and 31% strongly agreeing.

Question 5.1 "Adults should be free to make their own health choices"

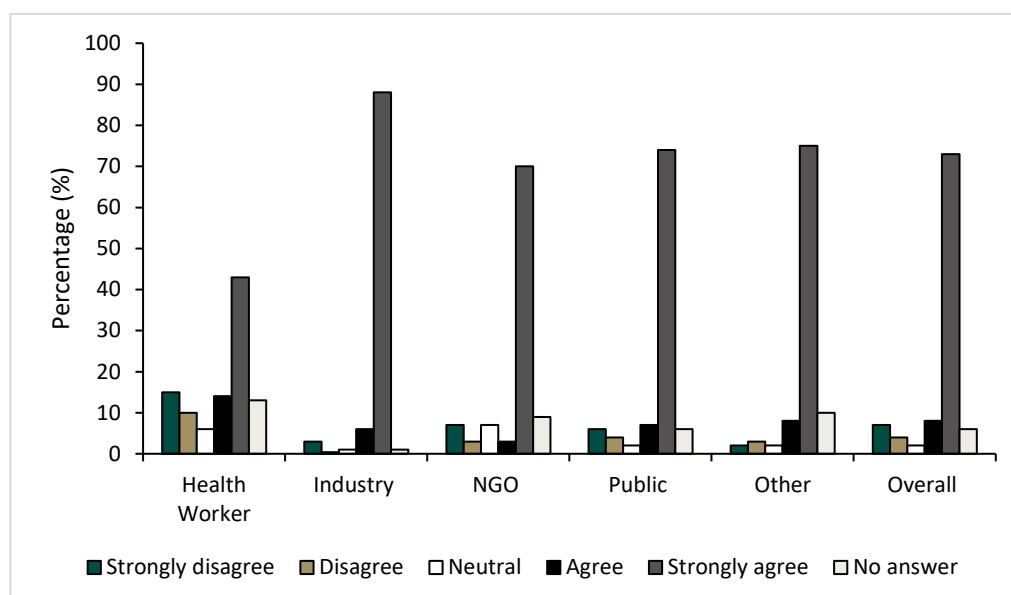


Figure 8: "Adults should be free to make their own health choices". Overall responses and responses by cohort.

The respondents who identified as Public and NGO were broadly in line with the overall results, which showed that 73% of respondents strongly agreed that "Adults should be free to make their own health choices".

When the Health Worker cohort was viewed separately, 43% strongly agreed and 15% strongly disagreed with the statement. In contrast, where the Industry cohort was viewed separately, 88% strongly agreed and 3% strongly disagreed with the statement.

Question 5.1 " Sunbeds should be controlled like tobacco"

Table 4: "Sunbeds should be controlled like tobacco". Overall responses and responses by cohort.

Response	Health Worker	Industry	NGO	Public	Other	Overall
1 – Strongly disagree	17%	29%	33%	28%	30%	27%
2 – Disagree	8%	19%	11%	13%	12%	13%
3 – Neutral	2%	8%	3%	5%	5%	5%
4 – Agree	10%	8%	4%	10%	10%	10%
5 – Strongly agree	53%	17%	44%	30%	30%	31%
No answer	10%	18%	5%	14%	13%	14%

The respondents who identified as Public and Other were broadly in line with the overall results, which showed that 31% of respondents strongly agreed that “*Sunbeds should be controlled like tobacco*”, and 27% strongly disagreed.

When the Health Worker cohort was viewed separately, 53% strongly agreed and 17% strongly disagreed with the statement. When the Industry cohort was viewed separately, 17% strongly agreed and 29% strongly disagreed with the statement.

Question 5.1 "A ban on sunbeds would be a step too far"

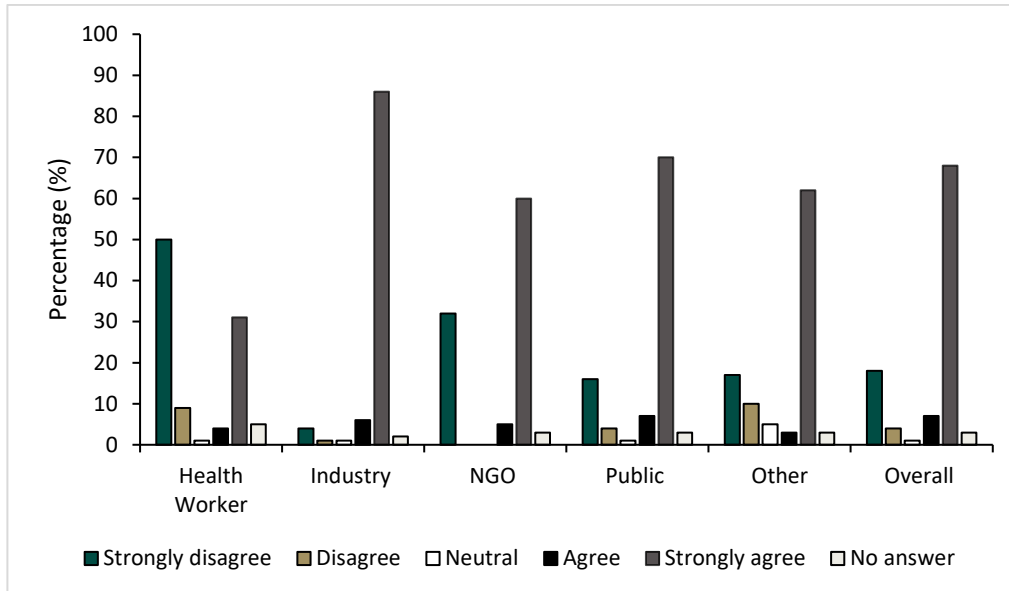


Figure 9: "A ban on sunbeds would be a step too far". Overall responses and responses by cohort.

The respondents who identified as Public and Other were broadly in line with the overall results, which showed that 68% of respondents strongly agreed that "A ban on sunbeds would be a step too far", and 18% strongly disagreed.

When the Health Worker cohort was viewed separately, 31% strongly agreed and 50% strongly disagreed with the statement. When the Industry cohort was viewed separately, 86% strongly agreed and 4% strongly disagreed with the statement.

Question 5.1 "I would welcome a ban on the commercial use of sunbeds"

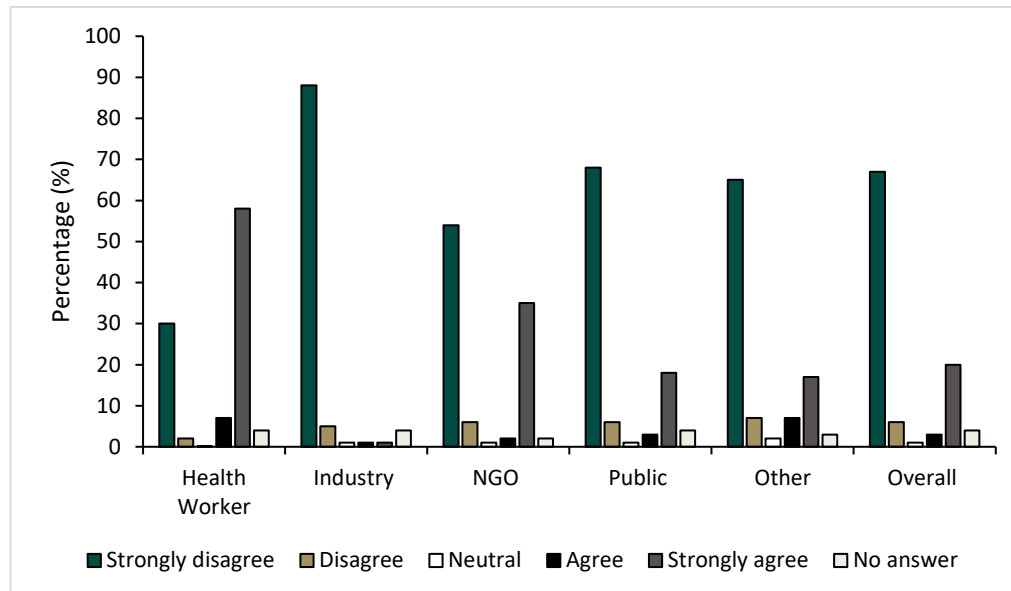


Figure 10: "I would welcome a ban on the commercial use of sunbeds". Overall responses and responses by cohort.

The respondents who identified as Public and Other were broadly in line with the overall results, which showed that 20% of respondents strongly agreed that they "would welcome a ban on the commercial use of sunbeds", and 67% strongly disagreed.

When the Health Worker cohort was viewed separately, 58% strongly agreed and 30% strongly disagreed with the statement. Conversely, when the Industry cohort was viewed separately, 1% strongly agreed and 88% strongly disagreed with the statement.

Question 5.2 Would you support the Government taking the following actions?
(tick all that apply)

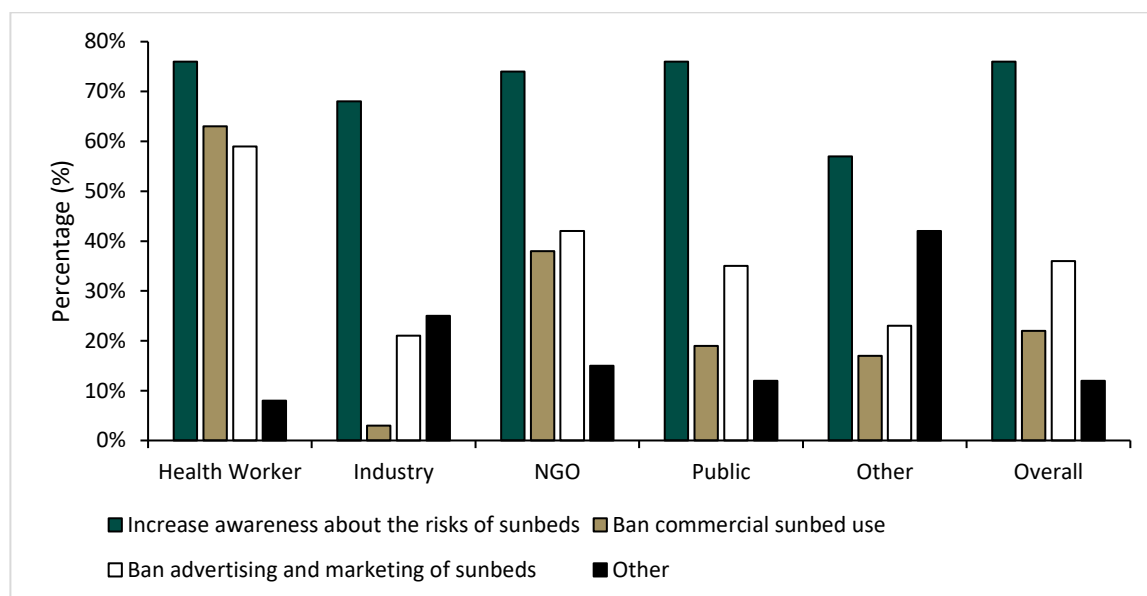


Figure 11: Support for potential government actions. Overall responses and responses by cohort.

Respondents were able to choose multiple options in response to this question. ‘Increasing awareness about the risks of sunbeds’ is the preferred action selected for both overall, and when the cohorts are viewed separately.

Below are some examples from respondents who chose “Other”:

“Skin cancer checks for sun bed users.”. (Health Worker)

“Make SPF tax free.”. (Health Worker)

“Greatly increase resources, powers and penalties to enforce Public Health (Sunbeds) Act and regulations, both for physical services and online marketing.”. (Health Worker)

“Existing laws (Public Health (Sunbeds) Act 2014) must be enforced before new legislation is considered. In such circumstances, a ban is both disproportionate and unnecessary.”. (Industry)

“Close places that do not follow the guidelines for the use of sunbeds as in places that accept under age and don’t give out the proper health information for before and after use.”. (Industry)

"Have all sunbed shops have the European standard of tanning lamps and for all sunbed shops kept to the highest standard of tanning beds/lamps/age requirements and prevention of illegal substances like nasal sprays and tanning injections." (Industry)

"A ban on Tanning Nasal Sprays, specifically Melanotan II Products and injections including advertising and sale." (NGO)

"Make regulations stricter regarding age." (NGO)

"Ban hiring out of sunbeds for home use also." (NGO)

"Control the lamp check and exchange cycles like in Germany." (Public)

"Increase a tax on the use of commercial beds and taxes on buying them." (Public)

"Ban tanning product's like nasal sprays and injections for use on sunbeds." (Public)

"Introduce a tax on using commercial tanning beds, phased approached to banning commercial sunbeds." (Other)

"Check the quality of the sunbed salons." (Other).

Question 6. How would banning commercial sunbed use affect you – what would you do?



Figure 12: How would banning commercial sunbed use affect you – what would you do?
Overall responses.

The overall word cloud analysis in EU Survey identified topics such as health, skin conditions, cancer, risks, holidays, buy, confidence, choice, and mental health. A topic analysis was conducted on the responses, and examples of these responses are illustrated by cohort below. Due to the large number of respondents, not all responses can be included and are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Question 6 – How would banning commercial sunbed use affect you – what would you do? Health Worker Cohort



Figure 13: How would banning commercial sunbed use affect you – what would you do? Health Worker Cohort.

A topic analysis of the Health Worker cohort identified the following as common topics –

- Would not impact,
- Do not use,
- Prevent skin cancer,
- Alternatives,
- Mental Health,
- Overreaching,
- Skin conditions.

The quotations below represent a sample of the responses relating to these topics from the Health Worker cohort -

“Would not affect me directly.”.

"It would stop use from friends who I have concerns about over use. I used them for a few months in my twenties and then stopped but many relatives and friends continued. A lot of influencers use them also which I think makes them more appealing to friends on social media."

"Help protect my friends and family and the overall population from unnecessary skin cancers. It is a public safety risk, no question they should be banned."

"Use Fake Tan."

"It would affect the way I feel about my appearance and majorly reduce my confidence."

"Move country, no sun here sunbeds have benefits as well as flaws like everything. Are you going to ban swimming because you could drown, alcohol because you could get liver cancer, smoking because you could get lung cancer?"

"I cannot use fake tan due to a skin condition, same skin condition that gets the benefit from sun bed use."

Question 6 – How would banning commercial sunbed use affect you – what would you do? Industry Cohort



Figure 14: How would banning commercial sunbed use affect you – what would you do? Industry Cohort.

A topic analysis of the Industry cohort identified the following as common topics –

- Job losses/livelihood,
- Mental health,
- Alternatives,
- Skin conditions,
- Overreaching,
- Combined skin condition and mental health,
- Do not ban.

The quotations below represent a sample of the responses relating to these topics from the Industry cohort -

“If a commercial sunbed ban were introduced, I would be forced to leave a job I enjoy and have experience in. It would significantly affect my financial situation, as well as my professional identity. I would try to stay in the beauty industry, but it wouldn’t be easy to replace this source of income – especially since I’ve built a loyal client base over the years. I might consider retraining or expanding into other beauty treatments, but that would require time, investment, and support. Without proper government assistance, I would face serious challenges in maintaining my independence and stability.”.

“Sunbeds help me with my confidence and I would suffer mental health issues without.”.

“I would buy my own sunbed for home.”.

“This would affect me in many ways I would be severely self conscious of not only my tan but my skin as I suffer severely with psoriasis.”.

“It should be every choice as if you were buying alcohol and cigarettes. Closing tanning beds will not stop people from sunbathing and will start renting sunbeds for homes on the black market and taking dangerous measures.”.

“Personally I have bad skin and sunbeds help clear up my skin, also when I’m having a bad day sunbeds are for calming so they help.”.

“I struggle with tanning in the sun and sunbeds make me look healthy.”.

Question 6 – How would banning commercial sunbed use affect you – what would you do? NGO Cohort



Figure 15: “How would banning commercial sunbed use affect you – what would you do?” NGO Cohort.

A topic analysis of the NGO cohort identified the following as common topics –

- Mental health,
- Alternatives,
- Would not impact,
- Overreaching,
- Do not use,
- Skin condition,
- Prevent skin cancer.

The quotations below represent a sample of the responses relating to these topics from the NGO cohort -

“I would be depressed with bad skin and no colour I would look for an alternative to help me feel better.”.

“I do not use sunbeds - it would not affect me.”.

"It wouldn't. It's more so for young impressionable teens thinking it's attractive."

"I would be delighted to see the ban. We know it causes skin cancers."

[illegible]

A topic analysis of the Public cohort identified the following as common topics –

- Mental health,
- Alternatives,
- Skin condition,
- Overreaching,

- Do not use,
- Combined skin condition and mental health,
- Would not impact.

The quotations below represent a sample of the responses relating to these topics from the Public cohort -

"It helps my seasonal depression as I don't feel like the life looks zapped out of me. Before a holiday it gets rid of my risk of burning if they were banned I would struggle more with my mental health which will have long term effects."

"I would absolutely purchase a tanning bed to keep in my house and use it as I would with commercial sunbeds alongside my family and friends who would also benefit from this as they use commercial sunbeds."

"I would be covered in psoriasis from head to toe. I've tried every cream and treatment from my g.p and nothing clears my psoriasis except for sunbeds. I do one 6 minute session per week and in winter months one 6 minute session every 2-3 weeks."

"I would be very disappointed as I think it's a persons own choice if they want to use a sunbed or not we all know the risks when using them."

"I don't use sunbeds so it would affect me only in through friends and family who do use them not being able to anymore. In my experience who use them are very committed to using them despite fully knowing the risk. I don't think a public awareness campaign would really help. I think an outright ban is best."

"It would make me feel really insecure about my appearance as sunbeds have been the only thing to completely clear my acne and acne scarring. I spent hundreds on creams and prescriptions but none of them ever fully cleared it and prevented it."

"It wouldn't affect me. I use self tanning products instead now."

Question 6 – “How would banning commercial sunbed use affect you – what would you do?” - Other



Figure 17: “How would banning commercial sunbed use affect you – what would you do?”
Other Cohort.

A topic analysis of the Other cohort identified the following as common topics –

- Mental health,
- Would not impact,
- Alternatives,
- Overreaching,
- Do not use,
- Combined skin condition and mental health,
- Job losses/livelihood.

The quotations below represent a sample of the responses relating to these topics from the Other cohort -

"It would affect my mental health and I am highly insecure but when I do sunbeds I feel better about myself and more confident."

"It would not affect me at all."

"Buy my own."

"I feel it would go against my right as an adult, an adult who is able to make her own choices and doesn't need the government to decide what health choices I can/will make."

"A ban on commercial sunbeds would not affect me, unless I include knowing women who were heavy sunbed users and who died of skin cancer."

"Well as I use it for psoriasis it would make a huge difference to me."

"The ban could have a negative economic impact on businesses and the local economy, especially in areas where sunbed salons are concentrated."

5.2. Section B:

Section B was targeted at Industry i.e., those that selected ‘Owner, employee or entity with a commercial interest in the manufacture, distribution, import or sale/use of sunbeds, (UV tanning devices)’.

Question 8.1 - If you own or work in a business offering sunbeds for use, or are a person with a commercial interest in the manufacture, distribution, import or sale/use of sunbeds, how would a ban on commercial sunbed use affect you?



Figure 18: How would a ban on commercial sunbed use affect you?

A topic analysis of the responses identified the following as common topics –

- Job loss,
- Financial loss,
- Business loss,
- Mental health,
- Legal regulated business operator,
- Personal choice,
- Skin conditions,
- No ban,

- Tobacco/alcohol argument,
- Confidence.

The quotations below represent a sample of the responses relating to these topics -

“Very negatively. I have been the owner of a sunbed salon for over 12 years, and it is the only source of income for me and my family, including my two school-age daughters. I have invested substantial resources and effort into this business – from adapting the premises, obtaining planning permission, installing three-phase electricity, purchasing equipment, to completing the entire fit-out. A ban would mean the complete loss of my livelihood and the destruction of a long-term investment. I also believe that adults should have the freedom to make their own choices regarding the use of sunbeds, just as they do when deciding whether to consume alcohol, smoke cigarettes, or use e-cigarettes.”.

“A ban would have a devastating impact on me and my family and staff both mentally and financially, I have worked so so hard to run a compliant tanning salon that fully adheres to Irelands Sunbed legislation. My salon is now open nearly 5 years and I firmly believe the government should focus on enforcing the legislation that is already in place as I strongly believe the HSE does not do this.”.

“Loss of earnings, we invested a huge amount into our business. We purchased the unit when it went up for sale. We would have no jobs and have to let our entire staff go. Plus we would own a commercial unit with no use. We have spent the past 6 years building this business and forming relationships with customers who visit us for many different reasons, other than getting a tan. Our clients, especially elderly, come to do a Sunbed to feel good. For bone and skin issues. Plus, we offer red light therapy which has many health benefits. We have customers that suffer with psoriasis who also use our salon to help their skin.”.

“I have been working in the sunbed industry for many years, and I am strongly opposed to the proposed ban on sunbeds in Ireland. My opposition is not only based on the risk of losing my job, but also on behalf of the many clients who rely on our services and would be unfairly deprived of them. Every day, customers come to us and thank us for being there – not just for aesthetic reasons, but because our services genuinely help improve their well-being. Many of our clients use sunbeds to manage skin conditions, prepare their skin for holidays to avoid sunburn, or to simply get some light during the darker months – especially those who suffer from seasonal depression. Our equipment is

professional and modern, featuring not only UV light but also red and blue light therapy, which is known to assist in the treatment of various skin problems. A blanket ban would unfairly affect responsible businesses and take away a valuable option for people who use sunbeds in a safe and informed way. I strongly urge policymakers to consider the broader picture and the real-life impact this ban would have – not just on workers like myself, but on the thousands of people who benefit from our services every single day.”.

Question 8.2 - What supports would help you?



Figure 19: What supports would help you?

A topic analysis of the responses identified the following as common topics –

- No ban,
- Enhanced regulation/enforcement,
- Risk awareness,
- Compensation,
- Unknown/not sure,
- Financial aid,
- Personal choice,
- Job loss,
- Assistance to open new business/retraining,

- Legal regulated business operator.

The quotations below represent a sample of the responses relating to these topics -

"If the government chooses to ban my business that is fully legal and compliant with Irish and EU laws, I don't believe I should be left to carry the financial and emotional consequences of that decision on my own. I would expect fair compensation from the government for what I stand to lose – the income my business generates, the cost of my premises lease, the equipment I've invested in, and all the other resources I've put into building something that followed the rules. This should reflect not only the financial side of things, but also energy, and effort I've already committed to making the business work. Losing my business would not just be about money. The uncertainty would have a huge emotional impact on me, on my staff, and on my family. It would be important that mental health supports are also made available to everyone affected by such a decision."

"Financial support, education - gaining new qualifications for me and my staff members to ease in finding new job, legislation help in ceasing premise and equipment lease agreement earlier."

"Not banning the industry, potentially putting more restrictions or offering a financial incentive to restructure a whole business."

"I don't think sending me on a retraining course would solve the problem. Not every job can simply be replaced, especially in the beauty industry, where experience and long-standing client relationships are essential. Switching to social welfare is not a solution for me. I need systemic support that allows me to remain professionally independent while continuing to work in the beauty field. The best kind of support would be a fair regulatory approach – not a ban, but the introduction of safety standards (such as equipment certification and proper training for staff)."

Question 8.2 – What supports would help you? Please provide additional detail if appropriate.



Figure 20: What supports would help you? Please provide additional detail if appropriate.

A topic analysis of the responses identified the following as common topics –

- No ban,
- Job loss,
- Enhanced regulation/enforcement,
- Mental health,
- Personal choice,
- Better enforcement,
- Business loss,
- Legal regulated business operator,
- Unregulated products,
- Skin conditions.

The quotations below represent a sample of the responses relating to these topics -

“A total ban would destroy thousands of jobs and confuse customers. Regulation is already very strict – what we need is stronger enforcement, not elimination of an entire sector.”

A topic analysis of the responses identified the following as common topics –

- No ban,
- Personal choice,
- Tobacco/alcohol argument,
- Enhanced regulation/enforcement,
- Job loss,
- Business loss,
- Underground use,
- Skin conditions,
- Confidence,
- Mental health.

The quotations below represent a sample of the responses relating to these topics -

“As a tanning salon owner, I do not support a ban on commercial sunbed use. Professional, regulated salons follow HSE guidance to ensure customer safety, and adults should retain the right to make informed personal choices about tanning. A ban would not stop sunbed use but would instead push it into unregulated, unsafe settings.”.

“I am strongly opposed to banning commercial sunbed use in Ireland. This industry is already highly regulated, with strict safety measures in place to protect customers. Sunbeds are not only used for cosmetic tanning but also by people with certain skin conditions, helping them improve their quality of life and confidence. A ban would unfairly take away personal choice, cause job losses, and harm businesses that operate responsibly.”.

“There are already restrictions put in place such as prohibiting the sale of memberships or deals. A ban does not make the market and demand disappear, it only drives it underground and forces people to resort to less regulated and controlled means. Especially if there is a lack of knowledge on safety since the governments focus lays with prohibiting rather than educating.”.

“Overall, I agree with the ban. I believe that the risks outweigh the benefits. Many people are addicted without realising. It's a waste of money for most people and a scam because certain skin tones will not tan even on sunbeds and as employees we basically have to lie to these customers.”.

Giving into the beauty standards is ridiculous and we should encourage natural skin and get help for people who are insecure. However, the ban will be detrimental to businesses owners and employees. Therefore, I believe sunbeds should be fully banned for those under 25 or even older. The amount of minors that use sunbeds is also concerning. Even though it is taken very seriously in our salon to check IDs, I know many salons where this isn't the standard. I would also like for there to be more effort to ban vapes and nicotine in general."

5.3. Section C - Stakeholder Submissions

The Sunbeds Public Consultation on a potential ban on commercial sunbed use in Ireland received submissions from a health organisation, industry representatives, NGOs, a patient advocacy group, a professional association, sunbed businesses, and individuals. While some respondents supported a ban on commercial sunbed use due to public health risks, other respondents did not support a ban, arguing instead for enhanced regulation or expressing concerns about economic impact and consumer choice. Due to the size of some submissions, summaries of the submissions from eleven organisations are included in this Report; the full text submissions from ten organisations are available at the following link:

<https://www.gov.ie/en/department-of-health/collections/public-health-sunbeds-policy/>.

Summary of Submissions by Organisation

Cancer Patients Advisory Committee (CPAC)

CPAC supported a ban on commercial sunbed use. The submission included a summary of key evidence that sunbeds are carcinogenic, young people are especially vulnerable, the economic burden of skin cancer and the existence of successful precedents. It was supported by patient testimonies. CPAC recommended that the Irish government adopt evidence-based measures including -

- Implement a total ban on commercial sunbeds: Prohibit the operation of commercial tanning facilities for all ages,
- Strengthen public awareness campaigns,
- Invest in prevention, and
- Monitor and enforce compliance.

CPAC concluded – *“The evidence is clear, indoor tanning is a preventable cause of skin cancer with devastating human and economic costs. Ireland has an opportunity to lead in public health by implementing a comprehensive ban on commercial sunbeds, supported by robust education and enforcement. Such measures will save lives, reduce healthcare spending, and protect future generations.”*

Environmental Health Association of Ireland (EHAI)

The EHAI was fully supportive of a ban on commercial sunbed use in Ireland. The submission referred to the following –

- Skin cancer is the most common form of cancer in Ireland, with over 11,000 cases of melanoma and non-melanoma skin cancer diagnosed annually,
- The occurrence of high-risk skin types in Ireland places the population at greater skin cancer risk than most other countries around the world,
- Sunbed use carries an immediate human health risk, with the highest risk associated with use in childhood and adolescence, as well as frequent use. People who use sunbeds for the first time before the age of 35 increase their risk of developing melanoma by 75%,
- The risk of skin cancer can be reduced by limiting our exposure to ultraviolet (UV) radiation from the sun and from sunbeds,
- UV emitted from sunbeds is recognised as a carcinogen by the World Health Organization (WHO) and European Commission.

The EHAI referred to sunbed bans in Australia, Brazil and Iran. The EHAI also reinforced the message that education and awareness campaigns are key to bringing awareness and reducing sunbed use, as well as stronger regulation, including a complete ban on sunbeds.

The EHAI highlighted the serious public health risks associated with the use of Melanotan nasal sprays/injections. The EHAI called for regulation of these products so that they too can be banned and to bring about control of their sale online or otherwise.

In conclusion, *“the EHAI is fully supportive of an outright ban on commercial sunbed use in Ireland based upon the strong references made above. The EHAI is additionally lobbying for additional awareness campaigns as well as stronger regulatory powers on sunbed providers who are not obeying the current legislation in place and any future amendments that may be introduced. This is especially true for providers who are often and continue to not meet regulatory requirements in this regard.”*

European Sunlight Association (ESA)

The ESA did not support a ban on commercial sunbed use in Ireland. In its submission the ESA stated that commercial sunbeds are lawful products across the European Union, “*subject to strict harmonised regulation under the Low Voltage Directive (2014/35/EU) and relevant safety standards*”. It urged the Irish authorities “*to focus on strengthening compliance and enforcement of these existing rules nationally, rather than introducing such an extreme measure that is a prohibition which would raise serious concerns under EU law, particularly in relation to the principles of free movement of goods, freedom to provide services, freedom of establishment and proportionality*”.

ESA underlined a number of points for consideration including -

- Commercial sunbeds are already comprehensively regulated at both EU and national levels, with significant safeguards in place to protect consumer safety,
- The European Commission concluded that, to date, there is no “compelling new evidence” showing that further, more restrictive measures (beyond those already in place) are both necessary and effective. This recent EU position highlights the fact that the current regulatory framework provides substantial protection, and that any more restrictive measures would not only face serious challenges in meeting the legal tests of necessity, effectiveness, and proportionality, but would also require compelling new evidence to justify them,
- Disallowing the service would simply push demand underground or cause unintended consequences (e.g. unregulated, illegally operated sunbeds) with higher risks.

“In conclusion, we believe that while the objective of protecting public health is entirely legitimate, the proposed ban is an extreme step which is inconsistent with the current EU law. Additionally, such drastic measure not only risks unintended harms but is also unlikely to yield significantly better safety outcomes than measures which improve compliance. We therefore respectfully urge the Irish Government to abandon the proposal of a full ban, and instead focus on ensuring full compliance with the existing EU regulatory framework, strong enforcement, operator training, and consumer education.”

Health Service Executive (HSE) - Child Health Public Health Team

The HSE - Child Health Public Health team fully supported the government's proposal to ban commercial sunbed use in Ireland. The submission stated that the evidence unequivocally shows that artificial ultraviolet (UV) radiation from sunbeds is carcinogenic, disproportionately harms children and young adults, imposes avoidable costs on the health service, and offers no health benefit. This position is grounded in robust scientific evidence which is referred to in the submission.

The submission sets out the Child Health Imperative, including the following -

- Sunbed use has a disproportionate impact on children and young people,
- Current usage patterns among Irish children,
- Age-related risk amplification,
- Enforcement challenges and underage access, and
- Absence of health benefits.

Additionally, protecting children and young people must be at the core of public education efforts. International evidence suggests that clear communication of these child health risks is particularly effective in mobilising community backing for such regulations.

The submission also set out counter arguments and rebuttals relating to personal choice and liberty, regulatory sufficiency and economic impact claims. The HSE Child Health Public Health team made a number of recommendations including immediate legislative action, device surrender, enhanced enforcement, public education with a specific focus on protecting children and young adults, and research and monitoring.

The submission concluded that *"From a child health perspective, commercial sunbed use represents an entirely preventable exposure to a known Group 1 carcinogen that disproportionately harms young people during their most vulnerable developmental period. The scientific evidence unequivocally demonstrates elevated cancer risks, particularly among individuals who begin use during childhood or adolescence. Current regulatory frameworks have proven inadequate to protect children, with significant underage use persisting despite legal restrictions."*

International experience demonstrates that comprehensive bans are both feasible and effective, generating substantial health benefits and healthcare cost savings. The economic case for prohibition is compelling, with treatment cost differentials between early and late stage melanoma providing clear evidence that prevention is both more humane and more cost-effective than treatment.

The HSE Child Health Public Health team believes that Ireland has both the opportunity and obligation to follow international best practice by implementing a complete ban on commercial sunbed use. This action would position Ireland as a leader in child protection and cancer prevention while generating measurable benefits for both individual health and healthcare system sustainability. The evidence base is sufficient, the economic case is clear, and the moral imperative is overwhelming. The time for decisive action is now.”.

Irish Cancer Society (ICS)

The ICS supported an outright sunbed ban (commercial and domestic). It called for a ban on sunbeds on the basis that -

- Skin cancer is the most diagnosed cancer in Ireland,
- Sunbeds are carcinogenic and are linked to the development of cancer,
- Sunbed bans work.

The ICS submission referred to Sunbeds and skin cancer, Sunbed Use in Ireland, and Policy Context (Ireland, EU and International). It included data on skin cancer in Ireland, information on the dangers of UV radiation, and the lack of any safe level of sunbed exposure. It also included personal experiences. The submission stated that a ban on sunbeds will save lives and costs. On sunbed use in Ireland the submission stated that –

- One in five people in Ireland have used a sunbed,
- Too many children and young people access sunbeds, and
- Younger people and women are more inclined to use sunbeds.

ICS recommended the following -

- *Ireland should ban sunbeds.*

We encourage the government to examine health risks, potential lives saved, potential illnesses averted, and potential healthcare spending benefits of banning sunbeds.

- *Finance levers should be applied to commercial sunbed use ahead of a ban.*

For instance, explore the benefits and potential consequences of

- implementing minimum pricing structures,
- a complete ban on traditional physical or online marketing or advertising (including in front-facing aspects of commercial sunbed premises)
- ban on promotions of products aligned with minutes of sunbeds used.

- *Public health information and awareness.*

To coincide with the measures to restrict sunbed use, the ICS called for greater public awareness efforts to reduce the use of sunbeds, particularly to deter young people from starting to use sunbeds.

Irish Skin Foundation (ISF)

The ISF supported a ban on commercial sunbeds/indoor tanning devices for public and private use. Its rationale is *'The use of indoor tanning devices causes melanoma and other skin cancers with resulting morbidity, mortality and increased healthcare costs'*.

The submission included the following-

- Skin cancer survey, Galway 1966,
- Rising incidence of skin cancer and risks sunbeds pose,
- Legislation – potential gaps and challenges,
- The Australian ban as a template: key considerations,
- Addictive potential, and
- Nasal sprays, injectables and drops: Illegal Melanotans'.

ISF concluded that *"it is almost 60 years since the first medical survey examining the incidence of skin cancer was conducted in Galway. There has been a steep rise in skin cancer incidence in the intervening years, with the availability of sunbeds posing a significant additional risk, particularly given the high proportion of our population with skin type 1 and 2. Patient testimony, brings the necessity of a ban into sharper focus as both a preventative health and cost saving measure. New challenges have also emerged, such as the use of tanning adjuncts/ 'illegal melanotans', which are becoming more popular among sunbed users, particularly amongst younger cohorts who may be*

more influenced by their social environments. Another consideration is the 'addiction potential' of sunbeds for some, and how best to support people in their efforts to quit. Arguably, these are important constituent elements for broader legislative/policy consideration in supporting a sunbed ban.

It is heartening to see the success of the Australian experience, which could be used as a template here. But if we want to comprehensively safeguard citizens' health from avoidable skin cancers and save lives, a nationwide ban on commercial sunbeds/indoor tanning devices for public AND private use should be introduced. The ISF very much welcomes the opportunity to contribute to this public consultation and the government's efforts to address this important issue. We urge the government to seize this opportunity to demonstrate their commitment to protecting public health."

Pavee Point Traveller and Roma Centre (PPTRC)

PPTRC supported a ban on commercial sunbed use, with caution. The submission highlighted the following -

- Context (as a minority ethnic group) - although there is a lack of ethnically disaggregated data, concerns have been raised by Traveller Primary Health Care Projects on the use of sunbeds, in particular for younger Travellers.
- Unregulated Sunbed Use – as the use of sunbeds is highly prevalent within the Traveller Community, PPTRC is concerned that the use or purchase of unregulated sunbeds on the 'black market' may increase, causing further harm to an already vulnerable community.
- Use of other Tanning Products (injections, sprays and tanning drops containing melanotan) - as there is also a high use of these tanning products in the Traveller Community, PPTRC raised concerns that the use of these products may increase as an alternative to commercial sunbeds if they are banned.
- Health Literacy and Health Promotion – health promotion messages regarding the dangers of sunbeds and other unsafe tanning methods may not reach Irish Travellers as easily as they reach the general population, which may make them more susceptible to using other unsafe tanning methods if commercial sunbeds are banned.

PPTRC recommended the following -

- *“Tighter regulation or prohibition of unregulated private sunbeds and other tanning products containing melanotan is essential if commercial sunbed use is banned in Ireland.*
- *Implement ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census across all health services.*
- *Specific targeted messages to Travellers are needed on the dangers of sunbeds and melanotan, including the dissemination of culturally appropriate resources and the dangers of skin damage from the sun.*
- *Primary Healthcare for Traveller Projects should be fully funded and terms and conditions for workers addressed as Travellers get most health information from these projects”.*

Reetont Limited

Reetont Limited did not support a ban on commercial sunbed use in Ireland. Its submission included the following -

- The case against a ban,
- Human and financial impact - consequences for our business, our employees, and their families would be devastating,
- Economic contribution – our company makes a significant economic contribution to the Exchequer and the wider Irish economy,
- Equipment standards and investment - all of our tanning equipment is EU-approved and fully regulated.

This submission included ‘A Better Way Forward’ as set out below -

- Ireland already has the strictest and most up-to-date sunbed laws in Europe. Where is the evidence that these measures are not working? If the current legislation were fully enforced, it would be sufficient.
- If the European 0.3 standard for sunbed output were made mandatory, this would align with EU legislation and make a ban unnecessary.
- We believe in personal choice, responsible use, and balanced public health information.
- The government should focus on enforcing existing regulations, targeting misuse, and promoting balanced public awareness about all forms of UV exposure — particularly outdoor exposure, where most sunburn and overexposure actually occur.

In its conclusion *“We firmly believe that banning a well-regulated, lawful business is not the answer. Such a measure would cause severe economic and social harm, while failing to improve public health outcomes. Instead, Ireland should enforce the strong regulations already in place, align with EU law, and support responsible operators who contribute positively to employment, the economy, and safe tanning practices.”*

The Feel Good Group and ABC Tanning Limited

ABC Tanning Limited does not support a ban on commercial sunbed use. In its submission it stated that *“While we fully support the shared objective of raising awareness and ensuring responsible light exposure remains at the forefront of public health policy, we respectfully submit that the proposed ban is not evidence-based, is disproportionate and inconsistent with both Irish regulatory practice and European Union law.”*

The submission set out ‘Further arguments against a ban on commercial sunbeds in Ireland’ including the following –

- Sunbeds are already regulated,
- Indoor tanning is safer than outdoor sun exposure,
- Economic impact: Jobs and businesses at risk,
- Enforcement challenges & black market risk,
- Public demand still exists,
- A safer approach: responsible light therapy,
- Ireland should not act alone – EU law restricts unilateral bans.

It referred to economic impacts and stated that a ban on commercial sunbeds would have devastating economic impact on ABC Tanning and the broader community of independent salon owners nationwide. The submission also set out a critical review of the 2025 IPH Report on Sunbed Use in Ireland.

The conclusion in its submission stated –

“In summary, the current proposal for a full ban on commercial sunbeds represents a policy direction that is disproportionate, unsupported by the latest evidence, and inconsistent with Ireland’s regulatory and legal obligations.

Instead of prohibition, this consultation represents a unique opportunity for Ireland to lead with balance, fairness, and science. By promoting Responsible Light Therapy and strengthening enforcement of existing safeguards, we can protect consumers, support jobs, and ensure that adults continue to have access to safe, professional environments where risk is minimised and guidance is provided. We therefore urge the Department to revise the proposal and adopt an approach that:

- *Recognises both the risks and potential benefits of controlled UV exposure.*
- *Prioritises education and awareness to empower individuals to make safe, informed choices.*
- *Builds on the robust regulatory system already in place, rather than discarding it.*
- *Uses this consultation as a platform to educate and empower future generations about responsible sun behaviour—whether indoors or outdoors.*

Prohibition will not solve the problem. A balanced, evidence-led strategy that acknowledges the role of responsible light exposure is the only way to deliver meaningful, long-term improvements in public health.”.

The Sunbed Association (TSA)

The Sunbed Association did not support a ban on commercial sunbed use. TSA submission included observations relating to the following -

- Predetermination of outcome,
- Critique of the IPH Report,
- Failure to recognise emerging research on sunbeds,
 - Absence of proven causal link between moderate sunbed use and melanoma risk,
 - Health benefits of moderate sunbed use,
- Failure to recognise unintended consequences,
- Issues of proportionality and necessity.

The submission also highlights the importance of addressing the EU perspective on the regulation of sunbeds. It also raised the following key points –

- The controlled use of sunbeds compliant with EU safety standards in HSE regulated and well-run salons is safe. Sunburn must be avoided, whether in the sun, or on a sunbed. In fact, more sunburns happen in sunshine, than on a sunbed,
- The Irish proposals are regressive. There is a growing body of more recent independent research highlighting the benefits of controlled sunbed use for general health benefits,
- Sunbed salons operated by TSA members in Ireland are well run, regulated and compliant businesses which provide employment and provide a service that many customers want,
- There is no justification for a national ban on commercial sunbeds in Ireland. There are other proportionate solutions to achieve the identified public policy outcome,
- Existing regulations on sunbeds in Ireland have not been fully commenced by the government – 11 years after they were introduced,
- Before introducing new legislation, the HSE needs to apply and enforce existing rules and in particular tackle non-compliant operators,
- The Sunbed Association is accredited as a Training Provider for the EU Standard on Professional Indoor UV Exposure (EN 16489),
- The Sunbed Association can provide workshops on Sunbed Compliance for HSE Officers,
- As a member of the EU, Ireland needs to have regard to EU policy on sunbed regulation and the Internal market rules for goods and services,
- There are EU standards to regulate sunbed emissions with no proposals at EU level to ban sunbeds. No EU State has a domestic ban on sunbeds,
- Bans in other countries have not worked to deliver desired outcomes,
- Safe use of sunbeds is consistent with the National Cancer Strategy,
- There is empirical evidence to show that banning commercial sunbeds will drive business underground.

In conclusion, TSA observed:

- *“The review process would benefit from a more detailed, balanced and forensic review of the public health, public policy, legal and regulatory issues relating to the regulation of sunbeds in Ireland. The review process would benefit from consideration of all the relevant studies on the topic, not just those that reinforce a predetermined stance.*

- *In particular, the onus that exists for the State to test the adequacy of the existing measures and explore any changes that might be made to improve the current system has not been discharged.*
- *In particular it is difficult for the State to say that the current system of regulation has not worked effectively in circumstances where the existing legislative regime has not been fully implemented, the levels and extent of enforcement seem reserved and other key regulatory protections for consumers have not been applied. It is not unreasonable to expect that the existing regime will be fully applied and assessed, before invoking a new regulatory regime which involves curtailing key rights enshrined in both Irish and European law.*
- *The consideration of a ban on commercial sunbeds in Ireland by the IPH, the HSE and the Department of Health, needs to align with the realities at an EU level.*
- *Any proposal to ban commercial sunbed use in regulated contexts is regressive and goes against more recent emerging evidence identifying that the health benefits of sunlight may outweigh the risk of skin cancer. Instead of an obsessive focus on banning sunbeds, the emphasis of public health information should be on preventing sunburn, whether from sunlight or sunbeds.*
- *Finally, the Government should engage and work with a compliant and responsible sector represented by TSA in Ireland. Working in close co-operation with the trade association and operators will provide insights, guidance and perspectives which can only assist the development of soundly based and legally enforceable regulatory measures. Conversely continuing to ignore the perspective and experience of a lawfully operating and regulated business sector raises the risk of badly directed and ineffective measures being brought forward.”.*

The Sunbed Council of Ireland

The Sunbed Council of Ireland did not support a ban on commercial sunbeds in Ireland. While the Council recognised and shared the concerns regarding skin cancer and the risks associated with UV exposure, it emphasised the dangers of a complete ban on commercial sunbeds. Such a ban would not remove the demand for sunbed use. Instead, it would inevitably -

- Drive consumers towards home-use sunbeds, which are entirely unregulated and often poorly maintained.

- Encourage the growth of a black market, where devices may be accessed by under-18s or used without professional oversight.
- Undermine existing public health protections, as registered salons currently provide controlled environments, trained staff, and enforce age restrictions.

The Sunbed Council of Ireland believed that robust regulation, effective enforcement, and ongoing public awareness campaigns represent a safer and more practical solution than prohibition, which risks driving the practice underground.

Summary of Submissions from Individuals

There were 11 written submissions received from individuals. Of these submissions, six supported a ban on commercial sunbed use, while five did not support a ban. Reasons provided for supporting a ban on commercial sunbed use included diagnosis with melanoma as a previous sunbed user, the high risks associated with sunbed use, lack of an awareness of the dangers of sunbed use and being a parent of regular sunbed users. Those who were not in support of a ban on commercial sunbed use raised skin conditions, mental health, personal choice, a comparison to tobacco and alcohol, job losses, vitamin D and the Irish weather. Alternative suggestions were provided by those who did not support a ban, including an information campaign on sunbed use and greater enforcement on the restriction of underage use.

6. Key Findings

The Sunbeds Public Consultation received 9,320 survey responses from residents in Ireland. The majority of survey respondents self-assigned to the Public cohort (90%), with smaller numbers of respondents identifying as Health Worker, Industry, NGO or Other. Eleven written submissions were also received from organisations through the dedicated public consultation mailbox. The consultation provided valuable insight into the views of those who participated. Participation was self-selecting, respondents self-assigned their cohort, and the consultation sample included a high proportion of current or former sunbed users (84%). Therefore, the results of the public consultation should not be interpreted as statistically representative of the Irish population.

The survey findings indicate that sunbed use was common among respondents. Overall, 84% of respondents reported that they had used a sunbed at some point. Among those who had ever used a sunbed, the most frequently reported patterns of use were once a week and two to three times per week. The majority of respondents who had used sunbeds reported starting between the ages of 18 and 24 years, and over 70% reported that they had started before the age of 35 years. The main reported motivations for sunbed use were feeling better with a tan or preparing for holidays, special occasions or events. Free-text responses also referred to confidence, appearance, mental health, skin conditions and personal choice.

The consultation found significant divergence in attitudes towards a ban on commercial sunbed use. The majority of survey respondents opposed a ban on commercial sunbed use. A high proportion of respondents-

- strongly agreed that adults should be free to make their own health choices,
- strongly agreed that a ban on sunbeds would be a step too far, and
- strongly disagreed that they would welcome a ban on the commercial use of sunbeds

The level of opposition varied significantly by cohort. The Health Worker cohort were more supportive of a commercial ban than the Industry cohort.

While support for a commercial ban on sunbed use was limited among overall respondents, there was stronger support for other forms of government action. Increasing awareness about

the risks of sunbeds was the most widely supported measure across the survey responses. There was also some support for banning the advertising and marketing of sunbeds.

The free-text responses highlight a number of recurring topics. Respondents who opposed a ban frequently cited personal choice, adult autonomy, confidence, appearance, mental health, perceived benefits for skin conditions, and concern that prohibition could push sunbed use into home or unregulated settings. Industry respondents also raised concerns about business viability, employment, investment, retraining, compensation and the potential impact on compliant businesses. Respondents who supported stronger restrictions referred to skin cancer prevention, public health protection, concern about young people's exposure, and the view that sunbeds create avoidable health risks.

The stakeholder submissions show a difference between stakeholder groups. Some stakeholders supported stronger intervention, including a ban, citing the carcinogenic nature of sunbeds, the burden of skin cancer, the particular risks associated with early exposure, and the need for prevention, education and enforcement. Other stakeholders opposed a ban, suggesting that existing legislation should be better enforced, that further restrictions may be disproportionate, and that prohibition could have negative economic and unintended public health consequences by moving sunbed use into unregulated settings.

The consultation also identified potential unintended consequences including concerns about the hire or purchase of sunbeds for private use, black-market/unregulated activity, and the use of associated tanning products such as melanotan nasal sprays, injections and drops. The need to consider community-specific risks, health literacy and targeted communications was also highlighted.

7. Conclusion

The Sunbeds Public Consultation Report provides a summary of the views expressed by respondents and stakeholders on a potential ban on commercial sunbed use in Ireland. It shows that there are strongly held and divergent views on sunbed use. The consultation highlights the need to consider cancer prevention and public health protection alongside issues of personal autonomy, consumer behaviour, business impact, enforcement, proportionality and the risk of unintended consequences.

The findings should not be interpreted as statistically representative of the population of Ireland, given the self-selecting nature of the consultation, the self-assignment of respondent cohorts and the high proportion of current or former sunbed users among survey respondents. However, the consultation provides valuable insights into the principal issues that would require careful consideration in the development of any future policy or legislative proposal.

The submissions to the Sunbeds Public Consultation demonstrate a clear public health basis for continued government action to reduce exposure to artificial UV radiation. Health organisations, NGOs, a patient advocacy group, and a professional association emphasised the carcinogenic nature of UV-emitting tanning devices, the burden of skin cancer, and the importance of preventing early and avoidable exposure, particularly among children and young adults. These submissions support the continued prioritisation of sunbed risk reduction as part of the wider skin cancer prevention policy.

At the same time, the consultation identified significant opposition to a commercial ban among survey respondents, particularly among current or former sunbed users and industry respondents. Concerns raised included personal choice, confidence and appearance, mental health, perceived benefits for skin conditions, the impact on lawful businesses, potential job losses and the risk that prohibition could lead to increased private, home-based or unregulated sunbed use. These issues are relevant to any future policy considerations.

A consistent finding across the consultation was support for increased awareness of the risks associated with sunbed use. Among some of the respondents who opposed a ban, there was support for improved information, stronger enforcement of existing requirements, enhanced

compliance, and action on related risks such as melanotan nasal sprays, injections and drops. This indicates that public education, enforcement, targeted communications and consideration of unintended consequences would be important considerations of any future policy.

The consultation therefore identifies a number of matters for further policy consideration. These include the legal and practical implications of a commercial ban; the adequacy, implementation and enforcement of the existing regulatory framework; the potential for a shift to sunbed use in unregulated or private settings; the implications for businesses and workers; and the need for targeted public health messaging. Consideration should also be given to associated unsafe tanning behaviours and products, and to ensuring that communications reach groups and communities that may be less likely to be reached through mainstream public health messaging.

In conclusion, the consultation provides the views and opinions of the public, industry and other stakeholders on a potential ban on commercial sunbed use which will inform future policy development. It highlights the need for any future measures to be evidence-based, proportionate and capable of protecting public health, while also anticipating practical implementation challenges and potential unintended consequences. The findings of this consultation, together with the wider evidence base and relevant legal, economic and public health considerations, will inform future policy development in relation to the use of commercial sunbeds in Ireland.

8. Appendices

Appendix I – List of organisations who provided written email submissions

- Cancer Patients Advisory Committee (CPAC)
- Environmental Health Association of Ireland (EHAI)
- European Sunlight Association (ESA)
- Health Service Executive (HSE) - Child Health Public Health Team
- Irish Cancer Society (ICS)
- Irish Skin Foundation (ISF)
- Pavee Point Traveller and Roma Centre (PPTRC)
- Reetont Limited
- The Feel Good Group and ABC Tanning Limited
- The Sunbed Association (TSA)
- The Sunbed Council of Ireland