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Office of Science Quality  
Center for Disease Control and Prevention  
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INFORMATION QUALITY APPEAL

Your response dated July 2, 2020 to our submission dated January 7, 2020 does not address the information set forth in paragraph 4 on page 1 of our submission, stating that sunburns are strong risk factors but non-burning chronic sun exposure reduces or has a null effect on the risk of melanoma, and setting forth the molecular reason for the importance of sunburn. Nor does it address our statement that the only way to reduce the incidence of sun-related melanoma is to reduce the prevalence of sunburns. Nor does it explain why sunburns are not even mentioned on the CDC's webpage titled "Cancer Prevention and Control – State of the Science on Melanoma Prevention and Screening. All of these subjects need to be addressed by the CDC and taken into account in telling the American public the state of the science on melanoma prevention, and in stopping and reversing the exponential growth in melanoma incidence that has been going on in the U.S. since 1935.

Instead, your response addresses only our statements that (i) "non-burning sun exposure, even in very large amounts, is not a risk factor for melanoma" and (ii) "there is not a single study showing that non-burning sun exposure increases the risk of melanoma." With respect to (i), you state that UV radiation is a human carcinogen (true), that exposure to UV radiation damages skin, skin cells and DNA within skin cells (true) to trigger a tanning and pigmentation process (untrue insofar as it infers that tanning and pigmentation are triggered by damage to the body rather than being natural adaptive and protective responses to sun exposure. Also with respect to (i) you point out that WHO has estimated that between 50% and 90% of melanomas can be attributed to sun exposure (which, although true, says nothing about what kind of sun exposure (i.e., burning or non-burning). With respect to (ii), you do not provide a single study showing that non-burning sun exposure increases the risk of melanoma, but instead cite two studies of artificially-generated UV radiation that you claim shows an additional risk form melanoma from indoor tanning in addition to the increase in risk from sunburns. Without commenting overmuch on these two flawed studies, we point out that one (Boniol) is the work of a an employee of a private company whose funding is not disclosed but which appears to be close to industry, and the other (Vogel) concludes in Table 1 that the risk of melanoma from indoor tanning reduces as the number of lifetime sunburns increases, which makes no sense in light of the studies cited in paragraph 4 of our submission.

The correct science regarding sun exposure and melanoma is set forth in the attached paper, *Alfredsson et al. 2020*, which is the work of 15 of the world's leading scientists on sun exposure and human health. Drs. Armstrong and de Gruijl are the world's two leading scientists on sun exposure and melanoma.

We repeat our recommendation that the CDC's webpage should be revised as suggested in our submission.

Respectfully submitted,

Sunshine Health Foundation

By: /s/ Allen P. Miller  
Allen P. Miller  
President