

## **Full responses from brands/manufacturers provided to the ABC**

### **Bondi Sands:**

At Bondi Sands, the safety and quality of our products is our highest priority, and all our products undergo rigorous testing processes to ensure they meet industry standards, including the stringent regulations set by the Therapeutic Goods Administration (TGA).

As part of this commitment, all our product claims are substantiated with robust testing and evidence, including validated SPF, broad spectrum and water-resistant testing. This also applies to the Bondi Sands SPF 50+ Fragrance Free Sunscreen Lotion and Bondi Sands SPF 50+ Zinc Mineral Body Lotion, whose actual tested SPF values are 72.8 and 73.6 respectively, in accordance with the AS/NZS 2604:2021 standard. These results fulfil the criteria for an SPF 50+ rating and are in line with the claims on packaging, as well as adhering to Therapeutic Goods Administration regulations.

We therefore do not share the assessment by Choice as it does not reflect our testing and evidence in line with the relevant regulations.

We want to reassure all of our consumers that our sunscreen delivers the expected SPF when applied as instructed on the label. We regret that the report by Choice has caused concern among our own consumers and suncare users in general.

### **Cancer Council:**

Cancer Council is committed to providing high-quality, reliable sunscreen and takes SPF testing standards extremely seriously. Whilst we are very concerned by CHOICE's findings, we can confirm that we hold SPF test results from our product sponsor for each of the products CHOICE has tested, all of which show compliance with their labelled SPF rating.

SPF testing is conducted on human skin and can produce variable results between laboratories, even when the same standards are followed. However, all sunscreens sold in Australia must comply with strict requirements set by the Therapeutic Goods Administration (TGA), including holding SPF test reports produced from tests conducted in line with TGA-prescribed methods.

Noting the test results published by CHOICE and out of an abundance of caution, we have submitted the four referenced products for further testing by an independent international laboratory. All necessary actions to any findings will be implemented.

Australia has the highest rate of skin cancer in the world, with two in three Australians diagnosed in their lifetime. It is vital that consumers can have confidence in the sun protection factor (SPF) of their sunscreen, which is one of the five

essential forms of sun protection.

**Coles:**

Coles takes the quality and specifications of our products very seriously and we work closely with suppliers to meet all required standards and ensure our products accurately reflect their labelling.

As soon as we became aware of CHOICE's query regarding this product, we conducted a thorough review of all documentation, which confirmed that our product meets the necessary requirements based on testing conducted by the manufacturer.

Independent test reports provided by our supplier verified that Coles SPF 50+ Ultra Sunscreen complies with relevant sunscreen standards and fulfills its label claims.

However, we acknowledge the findings shared by CHOICE and have commissioned further independent testing to review these results.

**Edgewell Personal Care (Banana Boat):**

As a global expert in sun protection, Edgewell Personal Care is proud of the quality and performance of our Sun Care products. We firmly stand behind our SPF claims.

Independent test results show that the Banana Boat sunscreens tested by CHOICE not only meet but exceed the SPF 50+ claim.

Sunscreens are considered to be therapeutic goods in Australia and are regulated by the Therapeutic Goods Administration (TGA) whose requirements are some of the strictest in the world. All of our products are uniquely formulated for the Australian market and undergo rigorous testing to be fully compliant with requirements set out by the TGA.

**iNova pharmaceuticals (Invisible Zinc):**

We take our commitment to sun safety extremely seriously and pride ourselves on the quality and the safety of the products that are available in the market under the Invisible Zinc brand (IZ).

We understand that a sample of our IZ Face + Body Mineral Sunscreen SPF 50 was purchased Choice, and has subsequently undergone SPF testing with a test result of SPF37.8.

This result very surprising as it does not match the SPF testing results undertaken by the company. As an immediate action we have requested the sample that was tested by Choice in order to conduct further testing, with our manufacturer, to determine what has occurred.

In-line with our commitment to transparency, we want to clarify a number of facts to give consumers comfort that, when it comes to our whole Invisible Zinc range, we are committed to ensuring compliance with all applicable regulations and industry best practice before products are released into the market:

- Our products are made in a pharmaceutical manufacturing facility in Australia that is licensed by the Therapeutic Goods Administration (TGA) and that meets strict Good Manufacturing Practice (GMP) standards.
- We test all of our Invisible Zinc products for SPF (and other label claims) in an accredited testing laboratory in Australia in accordance with the Australian Standards. It is a TGA requirement that sunscreens sold in Australia meet the Australian Standards.
- Invisible Zinc Face + Body Mineral Sunscreen SPF50 was last tested against its SPF and water resistance claims in 2017 (and the formulation has not changed in the intervening period). Testing confirmed an SPF of 63.1. It is also worth noting that the SPF test results were achieved after 2 hours of water resistance testing.
- The standard protocol for testing SPF is on 10 human subjects. While we stand by that testing methodology, human skin can obviously be highly variable in different subjects and that can therefore lead to some variability in test results.
- Every batch goes through stringent quality control testing before it is released for sale to confirm that it has been manufactured to the same formulation that has gone through SPF testing.

### **Neutrogena:**

We stand by the label claim of SPF50 on Neutrogena® Sheer Zinc™ Dry Touch Lotion 88ML. Every product in our Neutrogena® sunscreen range sold in Australia complies with all relevant Australian standards and regulatory requirements.

### **Ultra Violette:**

Ultra Violette is deeply committed to the health and safety of our customers and only work with reputable, TGA licensed manufacturers who perform substantial quality release testing in accordance with the strictest SPF standards in the world. Given our commitment to producing the highest quality sunscreens for consumers, we do not accept these results as even remotely accurate. It is also essential to note here that the recognised authority governing sunscreens in Australia is the Therapeutic Goods Association (TGA), not Choice Magazine.

Ultra Violette first completed testing for Lean Screen in 2021 (with results of SPF of 64.32 to allow for an SPF 50+ rating) as required to support our listing on the Australian Register of Therapeutic Goods (ARTG), and again in 2024 in accordance with the FDA standard revealing consistent results for UVB. Additionally, we performed a separate UVA test and received a PA ++++ rating (the highest possible score for UVA protection).

However, to ensure complete transparency and peace of mind for our customers, we proactively initiated another urgent SPF test of the batch in question in April this year (2025). We retested our product in a full 10-person panel and the results have come back at 61.7, which is above the threshold required by the TGA to make a 50+ claim. Choice's recent retest only included 5 participants, where 2 results were considered non validated, resulting in a sample size of only 3.

Lean Screen contains 22.75% zinc oxide, a level at which, when applied sufficiently, would render a testing result of SPF 4 scientifically impossible. We have a Certificate of Analysis to prove the zinc in this batch was in specification, so this was not a manufacturing issue.

Lean Screen was not identified in any supporting documentation from both Choice tests, therefore there is no guarantee that these test results are indeed reflective of this product. Due to the blind nature of this test, human error and the mix up of samples is a highly probable scenario. There is also the question as to whether the product was appropriately decanted and labelled correctly for this blind testing – as stated in the ARTG guidelines - and done so in a GMP (Good Manufacturing Practice) facility.

Reproducibility of results is a key element to scientific truth. Two blind tests with a very small sample size are not substantial in comparison to the extensive rounds of testing with supporting documentation Ultra Violette have conducted in accordance with the TGA testing guidelines.

We rigorously retest our entire SPF range every two years. Lean Screen has been on the market for 5 years in 29 countries and we have not received a single substantiated claim of sunburn during use – reinforcing our confidence in the testing we have. If the Choice results represented the actual level of protection offered, we would have had hundreds of cases of reported sunburn and skin damage while using this product in real life situations.

At Ultra Violette we take misleading claims made about our products very seriously. As a suncare brand founded in Australia, the country with the highest skin cancer rates in the world, we are too familiar with the fearmongering that exists in this category. It is disappointing that Choice has chosen to release what we view as misleading information in the interest of generating headlines – and not in the

wellbeing of the general public. We believe consumers deserve the correct and most credible information to stay safe and informed when it comes to sun protection and our priority, as always, remains the health and trust of our customers.

**Woolworths:**

All Woolworths own brand sunscreen products are manufactured and regularly tested as per the stringent Therapeutic Goods Administration (TGA) requirements, and all batches undergo a strict batch release process.

We're aware of CHOICE's report, and have provided a response that our Woolworths Everyday Sunscreen SPF 50+ 100 ML meets the label claim of its SPF rating, as per our internal records, including independent testing.

**Sun Bum:**

At time of publication no response was provided.

**Responses provided to CHOICE**

**ALDI:**

All ALDI sunscreen formulations have been independently laboratory tested in accordance with the appropriate Australian/New Zealand Standard to ensure they meet their labelled SPF, broad spectrum and water-resistance claims. The formulas are regularly tested on an ongoing basis to ensure they continue to meet the strict industry regulations. We have requested CHOICE's test report and methodology, so we can investigate the claims further.

**Nivea:**

We want to assure consumers that all NIVEA Sun products are registered with the TGA and meet the Australian Standard AS/NZS2604:2012, the currently relevant Standard for existing products. Our NIVEA Sun products have been tested for SPF efficacy and as a result all SPF sun protection claims made on the products have been validated.