



DSM Personal Care and Aroma Ingredients
North America
www.dsm.com

August 18, 2022

Modernizing OSHA standards to include Sunscreen as Required PPE for Outdoor Workers

Skin cancer is now the most common form of cancer, with over 5 million people diagnosed in the U.S. each year. Melanoma is one of the deadliest forms of skin cancer, with about 99,780 invasive melanomas expected to be diagnosed in the U.S. this year, according to the [American Cancer Society](#). It's estimated that about 7,650 Americans will die of the disease, which includes approximately 5,080 men and 2,570 women. Nonmelanoma skin cancers, like basal cell carcinoma and squamous cell carcinoma, also contribute to death, disfigurement and loss of time on the job for treatment and recovery.

Many of us earn our living indoors, and when we do choose to be in the sun, we can use sunscreen, wear protective clothing and seek shade. But for those who are required to work outdoors, regardless of the weather, they are at far greater risk of overexposure to ultraviolet radiation.

Whether they are construction workers, agricultural and infrastructure laborers, mail carriers or lifeguards, our **roughly 32 million outdoor workers across the United States** endure an almost daily brutal beating from cancer-causing ultraviolet radiation. **These Americans face a difficult choice every day: risk their health due to overexposure to ultraviolet radiation or risk their jobs by staying home.**

Sure – construction workers get hard hats, reflecting vests, goggles, etc., but sunscreen is not one of the safety measures provided, free of charge. Maybe it should be since solar radiation is a very real and present workplace hazard.

According to the [Centers for Disease Control](#), only 15 to 24 percent of construction workers report regular use of sunscreen. While the Occupational Safety and Health Administration (OSHA) requires employers to provide PPE to prevent injury from serious hazards, OSHA doesn't specifically require sunscreen based on an outdated understanding of sunscreen as "weather-related" protection only, and exempts coverage of sunscreen as PPE because "the cost of requiring employers to pay for . . . weather-related protective gear, sunscreen, etc. would be quite high."¹ This is particularly concerning given that OSHA suggests the use of sunscreen as protection against the sun, highlighting "an SPF of at least 15 blocks 93 percent of UV rays . . . to guard against skin cancer."² Clearly, even OSHA acknowledges that sunscreen is not "solely for the protection from weather".

Hats, sunglasses, protective clothing and shade are important parts of a complete sun protection strategy, but they are not always feasible for certain jobs. Sunscreen is a simple solution for

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almost all workers. Without it, unprotected, exposed areas of skin absorb ultraviolet radiation, and it doesn't take a sunburn to cause damage – long term exposure to the sun increases risk of disease. And everyone is at risk. While people with lighter skin tones are the most vulnerable demographic, people of color are also susceptible to skin cancer, especially if they are outdoor workers, and they often fare worse due to unequal access to health care and prevention tools.

Considering the risk of sun exposure, the cost of replacing workers and the obvious benefit of sunscreen, shouldn't employers be required to provide sunscreen as PPE to all outdoor workers?

At DSM, we believe so and that's why we are working with 11 members of Congress to ask OSHA to review existing standards exempting employer coverage of sunscreen for outdoor workers so that standards better reflect the understanding that sunscreen is critical personal protective equipment and not for "weather-related" protection only. We believe revisiting the treatment of sunscreen as critical personal protective equipment covered by an employer will increase usage rates of sunscreen significantly³, leading to the reduction of two risk factors for skin cancer – sun exposure and sunburns.

Every American depends on outdoor workers – to deliver our mail, grow and harvest our food, build our homes and infrastructure. At the very least, they deserve to be #SaferUnderTheSun.

Interested in learning more? Contact Stephen Wood at Stephen.Wood@dsm.com