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FOR NATIONAL & GLOBAL HEALTH LAW
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The Secretary WHO Expert Committee on Selection and Use of Essential Medicines Essential Medicines Team
Department of Health Products Policy and Standards
World Health Organization,
Geneva, Switzerland

April 18, 2025

Dear WHO Expert Committee Members

A.25 Sunscreen, broad-spectrum – prevention of skin cancer in people with albinism

My name is Prof. Sarah L. Bosha and I am a global health law expert, international human rights lawyer, and a Visiting Professor at Georgetown University Law Center. I serve as Director of Legal Research and Human Rights at the O'Neill Institute for National and Global Health Law.

I am writing in support of the application to add SPF50+ broad-spectrum sunscreen for persons with albinism to the WHO Model List of Essential Medicines and Model List of Essential Medicines for Children, submitted by Muluka-Anne Miti-Drummond, the UN Independent Expert on the Enjoyment of Rights by Persons with Albinism.

Sunscreen lotion is essential to protect persons with albinism from the harmful effects of ultraviolet radiation, which are exacerbated for them as a population group due to the lack of protective melanin in their skin, hair and eyes. Climate change is expected to compound and increase the incidence of skin cancers globally. It is projected that for every 1% decrease in ozone layer thickness, the incidence of melanoma is projected to increase 1% to 2%, and squamous cell carcinoma (SCC) incidence would increase up to 4.6%, with basal cell carcinoma (BCC) incidence increasing by 2.7 percent (Parker, 2020). SCC and BCC are the most common cancers affecting persons with albinism worldwide (Kassang et al 2025), and, an estimated 98% of persons with albinism do not live beyond 40 years of age, with skin cancer being responsible for at least four fifths of these premature deaths (Carew et al 2023).

Thus, in light of climate change, skin cancer is a major public health concern globally, and an acute public health concern for persons with albinism. It is imperative that sunscreen lotion be designated an essential medicine to protect their right to health enshrined in the World Health Organization

Constitution and various international and regional treaties. These treaties include, Article 12 of the International Covenant on Economic Social and Cultural Rights, Article 24 of the UN Convention on the Rights of the Child, Article 25 of the UN Convention on the Rights of Persons with Disabilities' and Article 17 of the Protocol to the African Charter on the Rights of Persons with Disabilities'. Additionally, international law mandates that persons with disabilities, which includes persons with albinism, be provided with health services and products that meet their unique health needs according to their disability. Persons with albinism are recognized as persons with disabilities due to their lack of melanin, and thus sunscreen lotion is vital for their health and well-being.

In my work as an international human rights and global health lawyer, I have argued before the African Court on Human and Peoples Rights (African Court) on the centrality of sunscreen lotion as a medicine to support the right to health and enjoyment of other human rights by persons with albinism. The recent decision of the African Court in the case of Centre for Human Rights & Others v Republic of Tanzania (Application No. 019/2018) affirmed that position. In its historic judgement, the Court stated that, "… the provision of sunscreen…are not a luxury to PWA [persons with albinism] but the thin line between good health and serious infirmity, by analogy, it is akin to having access to potable and safe drinking water." (para 345)

Further, my research in Zimbabwe with communities of persons with albinism has found that while there is knowledge of the protective properties of sunscreen lotion, there is high unmet need in consistent access to the medicinal product (Bosha et al, 2025). Adding sunscreen lotion to the Essential Medicines List will ensure that governments around the world prioritize its procurement, making it more widely available, accessible and affordable to persons with albinism, which will safeguard their right to health and life, and upholding their dignity.

Yours faithfully,

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