

5th March 2026

To Whom it may concern

Ref: SPF 50+ Testing Accuracy and Product Quality

We want to clarify that our sunscreens have been tested in accordance with the strict standards required in Australia, including ISO 24444:2019 and AS/NZS 2604:2021, which are among the most rigorous sunscreen testing protocols in the world. These methods are overseen by the Therapeutic Goods Administration (TGA), ensuring that every SPF claim is backed by scientifically validated evidence.

Current testing results for our products confirm that they meet the SPF protection levels required by these standards. However, the internationally accepted ISO method of sunscreen SPF testing uses human subjects. It is a known issue that there is variability in SPF testing results across laboratories because testing on humans can be highly subjective and the response to a test can differ dramatically from one individual to another. This variability can occasionally result in SPF values that fall below the threshold for a “50+” label, even when the formula itself is highly protective and does not indicate a safety or quality issue with the product.

Independent reviews and regulatory bodies have acknowledged that SPF testing can be challenging and that fluctuations in results are common across many brands. These challenges are part of a broader industry conversation about improving testing consistency and ensuring that consumers can have full confidence in SPF labelling.

We remain committed to transparency and to maintaining the highest standards of product quality and Marine Blue sunscreens remains, to the best of our knowledge, the only sunscreens subsidised by the New Zealand government to their albino population, which is, in our opinion, a statement to the quality of our products. Our formulas continue to provide strong, broad-spectrum protection against UVA and UVB radiation, and all our products remain fully compliant with Australian regulatory requirements. We are also actively monitoring ongoing industry discussions and regulatory updates to ensure our testing processes remain aligned with best practice.

Protecting your skin is our priority, and we stand behind the safety, efficacy, and integrity of our sunscreen products.

Your faithfully,

A handwritten signature in black ink, appearing to read 'M. Hudders', with a stylized flourish at the end.

Mark Hudders
Director