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To Whom it may concern

Ref: SPF 50+ Testing Accuracy and Product Quality

We want to confirm 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.

In regards especially to our sunscreen tested by a laboratory engaged by Consumer NZ, this formulation has undergone five independent full SPF tests, each comprising 10 valid results, being the measured static SPF values: **75.8, 64.3, 65.7, 70.2 and 65.8.** Taken together, these results provide substantial supporting evidence that the formulation consistently achieves the level of sun protection required to substantiate its SPF 50+ classification.

The reproducibility limitations of ISO 24444 in vivo SPF testing are well documented and the 95% predictive interval for static in vivo SPF testing of an SPF 50+ product (measured SPF >60) is SPF 35–103. This illustrates the substantial variability inherent in the testing methodology, rather than necessarily reflecting a corresponding variation in the product's actual protective performance. Across this interval, the estimated UV protection remains approximately 97.1–99.0%.

Independent reviews and regulatory bodies, including and the TGA, 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. Please click on the TGA link below for further information. The challenges of SPF testing | Sunscreen SPF testing - information for consumers | Therapeutic Goods Administration (TGA).

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 subsided 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.

Marine Blue sunscreens have been tested by independent laboratories accredited to conduct the relevant testing, and all results received support our products stated SPF and label claims. These tests contain intellectual property and information covered by contractual obligations and we are not able to release them publicly. However, we can confirm the results of these tests are in hand.

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

Your faithfully,



Mark Hudders
Director