

Impact of the Regulation

The amendment to the Regulation specifies the requirements for solarium equipment and the provision of solarium services in order to reduce the health risks associated with the service and to improve the safety of the service. The amendments establish uniform requirements for the technical documentation of solarium equipment, specify the documentation of lamp changes and provide for a limit value for the total irradiance of solarium equipment.

The main expected impact of the changes is the improvement of the safety of the solarium service and the prevention of health risks for the users of the service. Clarifying the regulations provides a clearer basis for supervision, reduces scope for interpretation and supports service providers in operating in accordance with the requirements.

The significance of the impacts under evaluation is based on their scope, frequency of occurrence, size of the affected target group and risk of undesirable impacts. The analysis is based on the content of the draft bill, the Health Board's supervisory practices, existing data on the use of solarium equipment and their compliance with requirements, and statistics from the National Institute for Health Development.

The impact analysis addresses the social impact of the Bill as well as its impact on the economy, administrative burden and public governance. The impacts have been analysed by area of impact, taking into account the various target groups. The main target groups affected are solarium service users, service providers (businesses and persons handling equipment) and the Health Board as a supervisory authority. The amendments do not have a direct impact on regional development, national defence, foreign relations, information technology or the environment and therefore the impacts in these areas have not been separately assessed.

4.1. Social impact

Target group: users of solarium equipment

The solarium service is available to the entire adult population, but the real impact will be on all users of the service. Solarium services are most commonly used by women aged 20-39¹, of whom there were 161,304 in Estonia as at the start of 2025². The most affected target group accounts for approximately 14 percent of the total adult population.

The WHO has included solarium use as a Level 1 carcinogen, with confirmed association to the development of cancer.³ In 2023, 160 cases of skin melanoma were diagnosed in women and 110 in men in Estonia. In addition, 1,642 cases of other types of skin cancer were recorded (620 in men and 1,022 in women).⁴ UV radiation plays a significant role in the development of both conditions.^{5,6} This confirms that the health risks associated with UV radiation are widespread in society and that preventive measures play a key role in reducing the incidence of these conditions. Additional requirements for solarium equipment will help to

¹ Heckman CJ, Coups EJ, Manne SL. Prevalence and correlates of indoor tanning among US adults. J Am Acad Dermatol. 2008 May;58(5):769-80. doi: 10.1016/j.jaad.2008.01.020. Epub 2008 Mar 6. PMID: 18328594; PMCID: PMC2601681.

² Statistical office. [RV021: POPULATION BY GENDER AND AGE GROUP, 1.JANUARY Statistics database..](#)

³ IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume 100: A Review of Human Carcinogens.

⁴ National Institute for Health Development. PK10: Primary cases of malignant tumours, by site, sex and age group. (data updated: 21-10-2025). [PK10:Primary cases of malignant tumours, by site, sex and age group.PxWeb.](#)

⁵ Estonian Cancer Society. (s.a.) Melanoma. [Melanoma – symptoms, risk factors and early detection | Estonian Cancer Society.](#)

⁶Health Board (2025). Solaria. [Solaria | Health Board.](#)

reduce the exposure of users to excessive UV radiation and the associated risk of skin cancer.

The affected target group is average. The extent of the impact is average, as the amendments to the Regulation will reduce the health risk for the service user. The frequency of occurrence of the impact is low to medium, depending on the frequency of use of the solarium equipment. This is a positive change for the user, and there are no undesirable effects.

4.2. Impact on the economy and administrative burden

Target group: companies and employees providing solarium services

It is not compulsory to notify the Business Register of the provision of beauty services; consequently, there is no information available on the number of solarium units in use in Estonia for the provision of such services. The implementation of the proposed amendments may result in additional costs for economic operators in connection with compliance with the technical requirements for solarium equipment, in particular the need to replace UV lamps earlier than before. The need to replace lamps arises in equipment where the total radiant power density exceeds the established limit value (0.3 W/m²). Based on inspections carried out by the Health Board in 2022 and 2023, between 60% and 81% of the devices inspected exceeded the limit value. Although these are the results of previous inspections and the current situation may have improved, the inspection statistics suggest that the change may affect a significant proportion of the solarium equipment currently in use.

The prices of solarium lamps are in the range of EUR 15 to EUR 25 per lamp, therefore changing the lamps may lead to a considerable one-off cost depending on the number of lamps used in the unit.⁷ According to manufacturers' estimates, the typical recommended lifespan of solarium lamps is approximately 500-1,200 hours⁸, which is why, in practice, they are replaced depending on the device's usage load – for example, with daily use of 8 hours, it is currently necessary to replace tanning lamps every 2-5 months, as the lamps' efficiency decreases over time. Consequently, this does not represent an entirely new cost, but the change may mean that lamps need to be replaced earlier in those devices where the total radiant intensity does not comply with the established limit value. Although, based on previous monitoring data, there may be a significant proportion of non-compliant devices on the market, the associated cost is temporary in nature – once the lamps have been replaced in accordance with the requirements for the first time, the business will not incur any additional costs beyond those of routine maintenance.

In addition, economic operators may face a minimal administrative burden in connection with the clarification of the content requirements for the technical documentation of solarium equipment, if these have not previously been met. Although the documentation must already be available under the current Regulation, the technical data necessary to assess the safety of the equipment may not always be included therein. In the event of incomplete data, economic operators must obtain the specified documentation from the manufacturer or importer and ensure that it is available at the place where the service is provided. The technical documentation also specifies the requirements for documenting lamp replacements – the current regulation already requires a report to be drawn up, but the amendment sets out what information the report must contain to ensure that lamp replacements are documented in a consistent, verifiable and monitorable manner. With newer devices, it is generally easy to obtain technical information from manufacturers, whereas with older devices, obtaining the relevant documentation may prove more time-consuming. If certain

⁷ E-lady. (s.a.) Low-pressure solarium lamps. [Low-pressure tanning lamps | Elady.ee](https://elady.ee).

⁸ Ars Longa. Lamps. [Lamps – ARS LONGA OÜ](https://arslonga.eu).

data can no longer be obtained from the manufacturer or if the documentation is incomplete, measurement results or calculations can be used to assess and refine the technical characteristics of the device and will be provided as appropriate technical documentation.

From the perspective of staff at a company providing solarium services, the change may entail an additional organisational obligation relating to the maintenance of technical documentation for the equipment, including records of lamp replacements. Tasks relating to the physical replacement of light bulbs are not normally part of employees' duties, and the change does not require them to have any specific technical skills. Consequently, the additional workload for staff is minimal and mainly involves the management and organisation of documents.

Some market participants have started adapting equipment earlier and have complied with the requirements stemming from standards, which reduces the additional costs associated with the implementation of the amendment for them. For companies whose equipment does not comply with the technical requirements to be introduced, the transition may entail more work, both in terms of reconfiguring their equipment and putting their documentation in order.⁹

In conclusion, the impact on economic operators is moderate: although the amendment may result in one-off additional costs for bringing equipment into conformity and a slight increase in administrative burden due to the clarification of documentation requirements, the requirements do not significantly change the nature of the service provision or the day-to-day organisation of work. The impact can vary depending on the company's compliance with the requirements in the past, and several market participants have started adapting the equipment earlier, which reduces the additional burden associated with the implementation of the change.

Target group: persons who directly operate and maintain solarium equipment

Persons operating solarium equipment will have new obligations compared with the current regulation, relating to requirements specifying technical documentation and lamp-replacement records. The amendment consists of a more precise formulation of existing activities, rather than the addition of new tasks of a substantive nature. This is an additional formalisation that does not directly change the nature of the work, but may lead to a temporary increase in the time spent in the initial phase of implementation of the requirements.

Given that the amendment affects a small target group, the nature of the work will not change significantly, and the additional administrative burden is limited and temporary, the impact is considered to be minor.

4.3. Impact on governance

Target audience: Health Board

The Health Board shall also perform state supervision of compliance with the requirements laid down for the provision of solarium services under the current Regulation. The draft does not alter the scope of supervisory duties, but clarifies the content of the technical documentation for equipment and the methodology for carrying out safety assessments based on such documentation. The changes may temporarily affect the Authority's workload

⁹ MTÜ Eesti Solaariumikoda [NGO Estonian Solarium Chamber]. Request: 23-03-2026.

in relation to supervisory activities, due to the need to adapt supervisory arrangements and develop the supervisory information system (related costs – see section 5).

The introduction of minimum mandatory data requirements for the technical documentation of solarium equipment will, in future, enable the safety of such equipment to be assessed on a more documentation-based basis than hitherto, and will reduce the need for regular laboratory measurements, particularly in cases where the manufacturer's documentation is complete (laboratory testing will still be applicable in cases where there is a suspected risk). The cost of measuring one device is around EUR 300, which is why the amendment will help to target the use of resources more efficiently and on a risk-based basis.¹⁰

The Health Board's previous monitoring practice shows that non-compliance with the requirements has been widespread – exceeding UV radiation limit values were detected in 81% of the devices inspected in 2022 and in 60% in 2023; no UV measurements were carried out in 2025. Deficiencies were also identified in the technical documentation of the equipment – the lack of original documents and incomplete formatted technical passports. Therefore, according to the Health Board, the specification of the documentation requirements creates a prerequisite for more efficient and systematic supervision, enabling a better and more resource-efficient assessment of the safety of devices and providing clearer instructions to service providers and users for mitigating health risks.

In the longer term, monitoring will become more resource-efficient and targeted, as costly measurements will be carried out only in justified cases on the basis of document analysis.

In view of the above, the impact on the Health Board is moderate and generally positive, as whilst the change may temporarily increase the Health Board's workload, in the longer term it will improve the effectiveness of supervision and enable resources to be used in a more targeted manner.

¹⁰Health Board Enquiry 19-03-2026.