

24 May 2019

Local Public Health Bylaw Review 2019
Wellington City Council
PO Box 2199
Wellington 6140

Tēnā koe

Re: Submission on the proposed amendments to the Local Public Health Bylaw 2008: Public Pools

Regional Public Health (RPH) is grateful for the opportunity to provide a written submission on proposed amendments to the Public Pools section of the Public Health Bylaw 2008.

As a public health organisation, RPH serves the greater Wellington region, through the geographical areas of the Capital & Coast, Hutt Valley and Wairarapa District Health Boards. RPH also works with eight local councils and one regional council. We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations.

RPH supports the continuation of the bylaw to provide registration for public pools as this will allow the Council to protect and maintain public health and safety at public swimming pools. We would also like to acknowledge the opportunity we had to provide input prior to public consultation. We would like to provide the following additional comments for consideration to ensure that the bylaw is effective and practical.

Inclusion of Water Play Parks

RPH **recommends** the Council include ‘Splash Pads’ (or water play parks) within the definition of a public pool “water-retaining structures”. If such facilities do not currently exist in the council area, such a provision will be useful for any future developments. RPHs recent experience with an outbreak of *Cryptosporidium* in February 2018 associated with use of the Raumati Marine Gardens splash pad, has shown the importance of these facilities being managed in the same manner as a public swimming pool – including consideration of treatment processes and public messaging.

The use of potable water without further treatment in splash pads is not sufficient to prevent contamination, if the system utilises recirculated water. RPH recommends additional treatment, such as UV (ultraviolet light disinfection), to protect children using these facilities, as there is a high likelihood that children swallow sufficient water to represent a public health risk if contamination is present.

RPH believes splash pads need to be managed in the same way as registered pools, including management by appropriately trained staff and requiring public health signage. Currently there is no

provision for splash pads to have public health signage that provide advice to avoid use during and after recent illness, and recommend use of appropriate swimwear or swimming nappies.

A Risk Based Approach to Meeting an Appropriate Standard of Operation

RPH **recommends** a risk assessment matrix be developed and used by the Council's authorised officers to assess the risks at each pool, before issuing a certificate of registration. This will allow an authorised officer to determine the appropriate level of standards a facility and their staff should meet, that is correlated to the likely level of public health risk that the facility may represent.

We are happy to provide further advice or clarification on any of the points raised in our written submission. The contact point for this submission is:

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Ngā mihi

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