

8 November 2019

Hutt City Council
Private Bag 31-912
Lower Hutt 5040

Tēnā koe

Re: Submission on the Proposed Appearance Industry Bylaw

Thank you for the opportunity to provide a written submission on the proposed Appearance Industry Bylaw.

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. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Regional Public Health **supports** Hutt City Councils Proposed Appearance Industry Bylaw and we believe it will strengthen the ability of the Council to meet public health standards and improve the well-being of the community. Many regions already have similar bylaws in place; Auckland Unitary Authority, Napier City, Dunedin City, Timaru, Stratford, Ruapehu District, Masterton and South Wairarapa Councils.

We would also like to acknowledge the opportunity we had to provide input prior to public consultation. Regional Public Health provides the following additional comments for consideration to ensure that the bylaw is effective and practical.

Proposed Bylaw Comments

| Page | Section | Comment |
|------|--------------------------------------|--|
| Pg 3 | 4. Purpose. 1a)iii, 1b)iii | The wording implies that the use of commercial sunbeds is included. If they are to be included this will need to be reflected in the Code of Practice. |
| Pg 7 | 6. A) 1) c) and B) 1) c) 6. A | As above Foot spas may not be a risk for piercing the skin but they do present a potential infection risk. RPH recommends that footspas are explicitly included in the bylaw. |

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| Pg 8 | C (4) Restricted Services | RPH strongly supports the restriction of the use of heel blades/razors. RPH strongly supports ophthalmic tattooing being a service restricted to appropriately qualified health professionals under the HPCA |
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Proposed Code of practice Comments

| Page | Section | Comment |
|--------|--|---|
| Pg. 21 | 3(24)(c) | Should be washed in warm water |
| | 3(25) | RPH recommends that HCC include provision for storage in a UV cabinet. We also recommend that an explanatory note is included in the "Interpretation" section stating that UV cabinets can maintain sterility of instruments processed by autoclaving or dry heat but do NOT of themselves offer sterilisation. |
| Pg. 28 | <i>Proposed Code of practice Comments</i> | RPH recommends that, where possible, traditional tools used for tattooing should be sterilised as in Part 3B. Where this is not possible, then the process outlined in 3(24) should be performed. |
| Pg. 28 | <i>Principles for healthy and hygienic tattooing</i> | RPH recommends that the following sentence is included. "Traditional tool tattooists also need to ensure the tattoo recipient is aware of the potential infection risks and pathogen spread associated with a traditional tattoo". |
| Pg. 39 | 4 (12) (c) | RPH recommends the addition of the phrase...'to the satisfaction of the council' or similar. |
| Pg. 39 | 4 (16) | RPH strongly supports the restriction of the use of heel blades/razors. |
| Pg. 39 | 4 (18) | This should occur even if the hands/feet have been washed or soaked. |

We are happy to provide further advice or clarification on our written submission. The contact point for this submission is:

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Ngā mihi

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