

10 January, 2022

Upper Hutt City Council
Via email

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, Regional Public Health (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** Upper 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, South Wairarapa, and more recently, Hutt City Council.

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. 12	3. Purpose, 3.4. (d)	Tertiary educational Institutions should be teaching best practice at all times. Therefore it is our belief that they should not be exempt from complying with the Bylaw. These institutes can play a large role in ensuring newly trained staff have a good understanding of the meaning and practice of infection prevention and control
Pg. 12	3. Purpose, 3.4. (e)	RPH recommend that traditional tattooing is included in the bylaw in some form e.g. required to follow the Ministry of Health 2010' Customary Tattooing Guidelines for Operators'

Pg. 14	Eyeball tattooing	RPH strongly supports that eyeball (ophthalmic) is strictly restricted to being a service only performed by Ophthalmologists. For absolute clarity RPH recommends including the wording 'Ophthalmologists who are registered and have a current practicing certificate with the NZ Medical Council.
Pg. 16	6.1 (k)	Replace the word 'dishwashing' with 'dishwasher'
Pg. 17	7. General Conditions of Operation	RPH suggests adding 'No services that risk breaking the skin should be performed on obviously infected or broken skin'
Pg. 25 Pg. 26	D.4, E.5	Medical consent for this practice should be in writing
Pg. 26	G. Manicure, Pedicure and Nail Clinics	Foot spas may not be a risk for piercing the skin but they do present a potential infection risk. RPH recommends that spa liners are required in all footspas rather than recommended
Pg. 26	G.4	RPH strongly supports the restriction of the use of heel blades/razors.
Pg. 27	H.3	Add 'Moles and pigmented skin lesions'. An operator is not trained to recognise Melanoma and skin cancer lesions in order to avoid removing them.

In addition, RPH believe a Code of Practice, or similar document, to sit alongside the Bylaw may provide operators with more guidance on how they can meet the required standards

We are happy to provide further advice or clarification on our written submission. The contact point for this submission is: Helen van Mil, Senior Health Protection Officer
Helen.vanMil@huttvalleydhb.org.nz; or 04 570 9002

Ngā mihi

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