

## Auckland Regional Public Health Service

Rātonga Hauora ā Iwi o Tamaki Makaurau



Working with the people of Auckland, Counties Manukau and Waitemata

## Auckland Regional Public Health Service

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### **Submission from the Auckland Regional Public Health Service to the Auckland City Consolidated Bylaw 1998 Review**

1. Thank you for the opportunity for the Auckland Regional Public Health Service to provide a submission to the Auckland City Consolidated Bylaw 1998 Review
2. This submission represents the views of the Auckland Regional Public Health Service (ARPHS). ARPHS provides public health services for the three district health boards in the Auckland region (Auckland, Counties Manukau and Waitemata District Health Boards), with the primary governance mechanism for the Service resting with Auckland District Health Board. This submission represents the views of the ARPHS and does not necessarily represent the views of the three District Health Boards.
3. ARPHS understands that all submissions will be available under the Official Information Act 1982, except if grounds set out under the Act apply.
4. The primary contact point for this submission is:

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## **Introduction**

5. Auckland Regional Public Health Service (ARPHS) works to improve, promote and protect the health of people and communities in the Auckland region. ARPHS's primary concern is to improve population health rather than deliver personal health services. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects on population health.
6. The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, outstanding infrastructure needs, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.
7. Policy to affect health gain is often marginalised to medical care. Health, however, is influenced by a broad range of policy decisions and is not solely the responsibility of the health sector. Statutes such as the New Zealand Public Health and Disability Act, Local Government Act, Resource Management Act and Building Act (amongst many others) all have elements designed to deliver outcomes promoting, protecting and maintaining the health of the community. Planning and policy decisions by central government, local government, non-government agencies and the commercial sector can have a large impact on health outcomes.

## **Part 5 Bathing, Health and Beauty Facilities**

8. The definition of a beauty therapy clinic fails to encompass stand-alone operators in the acrylic nail industry. Many manicure and pedicure operators will be in the same premises as hairdressers and be covered by the Health (Hairdressers) Regulations 1980, but acrylic nail operators are increasingly setting up as independent businesses and in some situations as business chains e.g. Professionails. There are guidelines around hygienic practices for that industry but they share many of the risks that beauty therapists do in terms of cross-contamination and infection. ARPHS has recently received a complaint that these guidelines are not being followed (the allegation was that pedi baths were not washed or disinfected and that buffers and nail files are not cleaned at all).
9. Incorporation of a definition of a beauty clinic within the bylaw would be beneficial. ARPHS suggests that the bylaw scope be extended to encompass beauty therapy clinics.

## **Part 15 Food Premises**

10. The completion of an approved basic food hygiene course by an owner or manager of a food premise may provide little assurance of food safety because in many situations there are a number of other staff who handle food (often without supervision by the manager or owner) and who have never attended a course.
11. While clause 15.1.b requires the presence of a 'managerial' staff member who has the authority and responsibility for training and supervising staff and who is actually involved in food manufacture, it does not go far enough. Such a staff member cannot be expected to focus entirely on food safety and supervise, potentially a number of, staff who may not be working within the direct oversight of such a staff member.

12. The requirement contained in clause 15.2.2 that requires at least 75% of staff involved in food preparation have passed an approved basic food hygiene course acknowledges this limitation.
13. ARPHS recommends that it should be compulsory for all food handlers in registered premises and stalls to have completed a basic food hygiene course within three months of commencing employment.

#### **Part 16 Food Stalls**

14. Clause 16.2.8(f) ARPHS recommends that an additional requirement that wounds should be covered with a water impermeable dressing and any plasters used should be brightly covered so that they do not get lost in the product, should be added to the bylaw.
15. Clause 16.2.8(g). ARPHS supports the inclusion of this clause. ARPHS believes that the clause as drafted also needs to include the requirement that persons wearing gloves wash their hands thoroughly after glove removal. Glove removal is a high-risk activity and it is very easy to contaminate oneself during the process.

#### **Other Comments relating to food vendors**

16. Part 15 of the bylaw does not contain a definition of food premises. Similarly Part 16 does not contain a definition of food stalls. Part 16 implies {clause 16.2.1(e)} that food may require manufacture or preparation. For the avoidance of doubt it would be beneficial to ensure that the requirements contained in part 15 around approved food hygiene qualifications were also included in part 16.

#### **Part 17 Skin Piercing**

17. ARPHS welcomes the incorporation of aspects of its feedback (dated 25/01/08 memorandum to Louise Le Grange) into the current draft bylaw.

#### **Conclusion**

18. Thank you for the opportunity to submit on these bylaws. ARPHS believes that the adoption of its recommendations would make the bylaws more effective.

Yours sincerely



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**Auckland Regional Public Health Service**