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May 1st, 2015

Tony Amalfa
Manager

Environmental Health Policy and Programs, Public Health Division
Ontario Ministry of Health and Long-Term Care

EnvironmentalHealth@ontario.ca

Dear Mr. Amalfa

Subject: Update and Review of the 2010- Operating Procedures for Non- Regulated Recreational Water Facilities Guidance Document

The Ontario Public Health Association (OPHA) values the opportunity to provide comments on the Ministry of Health and Long Term Care's Operating Procedures for Non-Regulated Recreational Water Facilities Guidance Document (Guidance Document). As a non-profit organization that brings together a broad spectrum of groups and individuals committed to improving health and wellbeing, OPHA welcome measures that protect health. As the provision of safe water is vital to users of these facilities across Ontario, the public health sector is actively involved in managing human health risks associated with recreational water facilities. The importance of this oversight has become clear with a number outbreaks associated with the use of such facilities in Ontario across Canada and the USA.

OPHA fully supports the review of the Guidance Document. Updated standards are needed to support health units in the effective management of public health risks at all non-regulated recreational water facilities. Furthermore, converting the Guidance Document into regulation will provide Ontario health units with the specific tools, standards and requirements needed to help protect public health.

As an example, a number of years ago a valuable Whirlpool-Spas Guideline was produced by the MOHLTC to assist public health units in monitoring the operation and use of public whirlpools and spas. After a number of years of OPHA, health units and health organizations advocating for change, the guidelines were entrenched into a public health regulation (Spas regulation 428 under the HPPA).

OPHA supports the same approach for the implementation of the updated Non- Regulated Recreational Water Facilities Guidance Document. A 2008 OPHA resolution called upon the government to enact updated regulations for waterpark pools, wading pools, decorative fountains (with body contact recreation), water slide receiving basins and in particular recirculating splash pads which are used mainly by children. The OPHA resolution was a result of the increased public health risks and management of outbreaks associated with water park facilities and their use. The resolution helped in the creation of the Guidance Document for Non-Regulated Recreational Water Facilities produced for Ontario health unit use and now it is time to move it directly into regulations. [The OPHA Resolution can be found here.](#)

OPHA will defer to health unit comments for details on specific sections of the Guidance Document, but is providing a few general comments here:

- UV should be a firm requirement for all re-circulating Splash Pad systems
- Operators and public health inspectors should be fully trained in the operation and management of high risk recirculating systems, as these systems are becoming very complicated (similar to having trained operators of Small Drinking Water Systems)
- Operators should be required to provide additional testing over and above the current standard chemistry testing when these systems are in operation (e.g. turbidity, regular bacteria water testing etc.)
- Discharges for these systems should allow for eco- friendly safe uses for irrigation, watering plants, and any regulatory barriers for surface water recharge should be addressed.
- The PHO Lab should have the licenses and capability to provide health unit with testing for Cryptosporidium in water especially to help investigate outbreaks (the Centre for Disease Control recommends Cryptosporidium testing during an outbreak)

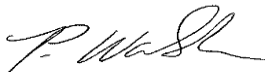
OPHA appreciates the opportunity to provide input on the need for these important health based regulatory standards for non-regulated recreational water facilities.

OPHA looks forward to the MOHLTC updating all recreational water regulations and entrenching newer wet forms of recreation uses i.e. splash pads into regulation. OPHA would also reiterate the need for additional legal tools such as short form wording (POA Tickets) to assist with prosecution of problem operators and assist public health units with public disclosure.

Please do not hesitate to contact me at PWalsh@opha.on.ca or the OPHA Environmental Workgroup Chair, Helen Doyle at Helen.Doyle@york.ca. Should you have and questions or wish to discuss our recommendations in detail.

Thank you for your consideration.

Yours sincerely,



Pegeen Walsh
Executive Director