

21 May 2014



SUBMISSION BY THE

Swimming Pool and Spa Alliance



to the

**Australian Pesticides and
Veterinary Medicines Authority**

regarding

**(Listed Chemical Product –
Home Swimming Pool and Spa Products)
Standard 2014**

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INTRODUCTION

The Swimming Pool and Spa Alliance

The Swimming Pool and Spa Alliance (SPASA) represents hundreds of Australian businesses within the swimming pool and spa industry. Members of SPASA include pool builders, manufacturers, suppliers, retailers, technical servicemen, subcontractors, installers, consultants and other allied trades, all of whom set themselves apart from the rest of the industry by setting standards of skill, workmanship and ethical business behaviour in the best interests of pool and spa owners.

SPASA is also a Registered Training Organisation (RTO) that provides training and assessment to the swimming pool and spa industry. Our courses are designed in consultation with key industry stakeholders and our qualifications and accreditations are highly valued by government, employers and the wider community.

SPASA welcomes the opportunity to comment on the *Agricultural and Veterinary Chemicals Code (Listed Chemical Product - Home Swimming Pool and Spa Products) Standard 2014*.

GENERAL COMMENTS

LABELS

The *Agricultural and Veterinary Chemicals Code (Listed Chemical Product – Home Swimming Pool and Spa Products) Standard 2014* includes only 7 schedules.

1. The range of products should be expanded to include:
 - a) Trichloroisocyanuric acid
 - b) Bromine (both tablets and granules)
 - c) A range of commonly registered Algaecides
 - d) Hydrogen Peroxide
2. Schedule 7 Label format is for listed chemical product in tablet form — Active constituent trichloroisocyanuric acid.

A new label is required to reflect granular trichloroisocyanuric acid.

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3. All labels refer to:

“For control of bacteria, viruses and protozoa in swimming pools/ spas”

Protozoa is not a common word and rarely used and understood by consumers.

A better statement might be:

“For control of algae, bacteria and viruses in swimming pools/spas” (or similar).

ANCILLARY PANEL

1. Free Chlorine: Free Chlorine Concentration suggests 10-15 mg/L.

In order to achieve 10mg/L plus free chlorine, total chlorine must be exceed 10mg/L. This is in stark contrast to various Dept. Health Guidelines that stipulate you should not exceed 10mg/L.

By way of example, NSW Health Guidelines advise:

Parameter	Situation	Concentration
Total Chlorine (DPD No 1 + No 3)	Any pool	Max 10.0 mg/L

Similar references are made by other state and territory Health Departments.

2. Total Alkalinity: Total Alkalinity states 60-200 mg/L

Australian Standards AS3633 Private Swimming Pools – Water Quality state 60-200mg/L

NSW Health Guidelines stipulate 80 to 200 mg/L

Similar references are made by other state and territory Health Departments.

GENERAL INSTRUCTIONS

State:

If pH falls below the required level add dry alkali, if it rises above add dry acid or hydrochloric acid.

This should be expanded to include sulphuric acid as it now becoming more widely used.

SAFETY DIRECTIONS

Safety directions state:

DO NOT allow the product to come into contact with other chemicals, especially acids, or with combustible material such as paper, fabric, sawdust or kerosene.

This should be expanded to include “detergent” as buckets in the home are often interchangeable.

PACKAGE LIMITS

Limits provided are 25kg or 25 litres.

This requires an amendment to include 40kg drums of Calcium Hypochlorite as they are a common sales unit.

REQUIRED LEVELS

1. Acid: Advice to adjust pH values down suggests Dry Acid or Hydrochloric Acid.

It is important to note that Sulphuric Acid is also commonly used, especially in West Australia.

Indications are that Hydrochloric Acid may become extremely short in the near future and Sulphuric acid may become the more common pH adjuster.

2. Isocyanurate: Reference is made to the allowable isocyanurate levels being increased from 50mg/L to 100mg/L.

Australian Standards AS3633 Private Swimming Pools – Water Quality nominate 30mg/L to 50mg/L.

Various state and territory Department of Health Guidelines (Public Pools) state that *“where a chlorinated cyanurate compounds, such as tri- or dichloroisocyanurate are used to chlorinate a pool, it must be discontinued when the cyanuric acid concentration exceeds 50 mg/L and another form of chlorine used”*.

FINAL COMMENTS

SPASA concedes that it has had little time to properly consider and address the *Agricultural and Veterinary Chemicals Code (Listed Chemical Product - Home Swimming Pool and Spa Products) Standard 2014* due to competing submission deadlines.

In this regard, SPASA submits that an industry driven “Working Group” be developed in conjunction with APVMA representatives to properly review the standard.

Further consultation with industry is required.

For further information:

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