

From: Jason Davidson <JDavidson@phta.org>
Sent: Wednesday, March 16, 2022 5:34 PM
To: CodesStandards, DAS
Cc: Justin Wiley; Nicholas Capezza; Dominick Mond; William J. Nash
Subject: Support: The 2021 International Swimming Pool and Spa Code
Attachments: [Jason Davidson_PHTA_CT.pdf](#)

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To the Department of Administrative Services:

On behalf of the Pool and Hot Tub Alliance (PHTA), please see the attached letter of support for the proposed adoption of the 2021 International Swimming Pool and Spa Code (ISPSC).

Jason Davidson



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March 16, 2022

Codes and Standards Committee
Department of Administrative Services
Office of the State Building Inspector
450 Columbus Blvd. Suite 1303
Harford, CT 06103

Re: Consideration of the 2021 International Swimming Pool and Spa Code

To the Codes & Standards Committee and the Department of Administrative Services:

This letter is in regard to the state of Connecticut's consideration of the International Swimming Pool and Spa Code (ISPSC). The Pool and Hot Tub Alliance (PHTA) (formerly the Association of Pool & Spa Professionals (APSP)) partnered with the International Code Council (ICC), the body responsible for many of our national building codes, to create the first ever national code for swimming pools and spas in 2012.

The International Swimming Pool and Spa code (ISPSC) is a comprehensive swimming pool and spa code developed collaboratively by PHTA and the ICC. The ISPSC belongs to the family of International Codes (I-Codes) and is even referenced in the International Building Code and the International Residential Code. Like all other I-codes, the ISPSC was developed through the rigorous ICC Government Consensus Process, which requires full and fair consideration of all comments and submissions, first by a balanced panel of recognized experts, and secondly, a final determination by the public servants who have hands on experience, and who comprise the ICC membership. The ISPSC is the only swimming pool and spa code designed to correlate with the building codes adopted in Connecticut and addresses ALL aspects of pool and spa design and construction through integrating quality, safety, and energy conservation.

Industry-Backed Standards Keeping Pools Safer for Everyone

The ISPSC is derived from and fully supported by the ANSI/APSP national consensus standards, which have been developed under the rigorous due process requirements of the American National Standards Institute (ANSI). The ISPSC will incorporate these standards for the construction of public and residential pools and spas and will use prescriptive and performance-related provisions that are well known and commonly used by industry professionals. In addition, the standards and other requirements within the code are based on up to date, scientific and third-party testing and research such as entrapment prevention, drowning prevention, energy usage, materials and dimensions.



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Helping Small Businesses in Connecticut by Voting for Consistency

Adopting the ISPSC promotes **consistency for small businesses**. The Connecticut pool and spa industry lacks a consistent and uniform code for the construction of pools and spas. Small businesses are faced with a city-by-city patchwork of multiple codes and construction standards that make it extremely difficult and costly to operate their businesses. By adopting one uniform swimming pool and spa code throughout the state, Connecticut pool and spa professionals will be able to grow their businesses in more than one jurisdiction with the certainty of code consistency. The ISPSC will reduce confusion for industry professionals, inspectors and officials, promote unified training opportunities for code officials and contractors across the state, and will ultimately make pools and spas safer for everyone.

The ISPSC will establish minimum regulations for public and residential pools, spas, and hot tubs using prescriptive and performance-related provisions. Additional benefits of the ISPSC include:

- Seamless integration with the most widely used model codes in North America, the International Building Code® (IBC®) and International Residential Code® (IRC®).
- Meets or exceeds the requirements of the federal Virginia Graeme Baker Act for suction entrapment avoidance.
- Covers fencing, decks, lighting, heaters, circulation systems, pumps, accessibility, diving, sanitizing equipment, filters, and suction fittings.
- Includes provisions for pools and facilities geared specifically for water parks, along with provisions based on the latest research for diving, barriers, general design, and water quality safety.
- All necessary provisions in one book. The ISPSC combines the provisions of the relevant sections of the IRC, IBC, IPC®, and IMC®, and the APSP standards, serving as a fully-integrated document for pool and spa safety.

On behalf of the many Connecticut pool and spa professionals represented by PHTA, as well as those states that do business in Connecticut, we respectfully request that you adopt the International Swimming Pool and Spa Code.

Sincerely,



Jason Davidson

PHTA, Director of Government Relations

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About Us

The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities.

APSP, now the PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals. Dedicated to the growth and development of its members’ businesses and to promoting the enjoyment and safety of pools and spas, PHTA offers a range of services, from professional development to advancing key legislation and regulation at the federal and local levels, to consumer outreach and public safety. PHTA is the only industry organization recognized by the American National Standards Institute to develop and promote national standards for pools, hot tubs, and spas. For more information, visit APSP.org or NSFP.org.



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