

Discussion Questions for PSS Operators:

1. Public Health And Safety

From your perspective as a PSS operator, can you comment on the positives, challenges, and issues of concern related the proposed amendments to the City's licensing by-law **to improve public health and safety** in personal service settings (PSS).

On the whole, the tattoo community in the GTA has reacted to the issue of proposed licensing with everything from acquiescence and acceptance to out and out enthusiasm. In short, we view it as an inevitability, if not a necessity, for the survival of a thriving professional community of artists, proprietors and enthusiasts. It is possible, if handled correctly, to utilize the licensing as a deterrent against underground tattooers operating outside of health and safety standards that are championed and upheld by the greater majority of the community. As well, this initiative can level the playing field as far as the understanding of the health and safety standards amongst artists and Toronto Public Health inspectors alike. We are appreciative of the opportunity to have this discussion with TPH and to participate in the process.

There are many challenges with regards to the implementation of a licensing program, not the least of which would be eliciting compliance from the already underground operators. Any shop that is above board at present is already subject to annual inspections by TPH and there have been no substantiated or direct cases of disease transfer attributed to any such establishment in the GTA to date. In fact, the incidence of infraction in shops that already comply with the present standards is quite low. But, prevention being the best medicine, many recognize the importance of officialising the system and getting inspectors and shops/artists on common ground when it comes to the standards and the reason behind their existence. As well, the notion of educating the tattoo community is one that is positive but requires a solid plan when it comes to logistics (Who is to be responsible for it financially? Who will be administering testing/instruction? How will the hundreds of PSS operators be instructed and tested in a reasonable amount of time and will there be a grace period for those already in operation?).

Our responses to the following questions will hopefully be helpful in shedding some light on how we feel these obstacles may be hurdled, as well as address our concerns regarding how the licensing program will be implemented and as to what measurements are to be taken by the city and TPH in determining and maintaining the standards.

The proposed amendments are:

- a. License all PSS where there is a risk of infectious disease transmission

The community is in agreement that this is a positive initiative, but that it should certainly mean something more than an annual fee. We feel that it should also be recognized that the businesses that are being discussed are low-risk, and therefore held to a reasonable set of standards in accordance with said risk (IE we're not performing brain surgery, so therefore feel that similar standards may be a tad drastic). Policing of said licensing and levied fines may discourage some from operating underground, and give the public a cut and dry answer to the question, "Are you safe?"

Concerns also lie in with the overworked licensing department and understaffed inspection department at TPH? Perhaps the licensing fees can be partially utilized for the purpose of training and education of more staff for TPH as well.

- b. Require a public health inspection prior to the opening of all new PSS operations

While there are current standards in place for the operation of such a business, it is our understanding that one is able to operate prior to inspection at present. It is a positive idea to change that and to require inspection

prior to operation, however it may become problematic as this is a possible recipe for back-log and towering paperwork for the city. This is the chief challenge to overcome regarding this amendment.

- c. Require PSS to comply with the Medical Officer of Health's infection prevention and control recommendations.

If this is in reference to the health and safety standards that are outlined and check-listed in our annual inspection, then we already do. The thing that we find problematic here is that the standards seem to enjoy drastically different interpretation from inspector to inspector and some standards make sense while others are vague or seemingly unrelated to the risks associated with tattooing or any PSS. We would love to have the opportunity to participate in the re-vamping of the inspection standards and would also appreciate if the inspectors or those who are to be training inspectors would also participate in the process of determining and understanding the whys and wherefores of said standards. We have intelligent health educators in the community that can aid in the explanation of how it is we do what we do and what can be done to keep it safe. If there is any part of this document that concerns us most, it would be this process along with the proposal for training.

- d. Require infection prevention and control training for PSS operators (developed by the Ministry of Health and Long-Term Care).

There are many in the tattoo industry who take it upon themselves to be trained and informed when it comes to blood borne pathogens and risks related to our operations. We feel that this is an integral part of our training (be it passed down during apprenticeships or learned after through the Health Educators program). If it is to be formalized and standardized, then the questions previously mentioned come to mind. Who is to be responsible for it financially? Who will be administering testing/instruction? How will the hundreds of PSS operators be instructed and tested in a reasonable amount of time and will there be a grace period for those already in operation? It is another area of great concern to us, but one where we believe we can help by offering resources and instruction through established organizations within the community (IE Health Educators). Again, we'd just like to be a part of this process, as it is often the case where we are told that TPH is in a position of mystery with regards to what we do and how we do it. We would love to help explain and to come up with standards that all parties can find agreeable.

2. Public Disclosure of Inspection Results

From your perspective can you comment on the positives, challenges, and issues of concern related the proposed amendments to the City's licensing by-law to give the **public easy access to public health inspection** results for PSS across Toronto.

The proposed amendments are:

- a. Require PSS operators of premises where there is a risk of infectious disease transmission to post inspection results.

Absolutely. We'd love a certificate that states clearly to the public that we are in compliance and therefore deemed safe by TPH. Unlike the restaurants, however, a green-yellow-red system may not apply. Imagine the squeamishness of the public approaching a PSS establishment with a yellow sign. We feel that if and establishment is deemed unsafe (that is found to have infractions that directly threaten public safety-like an improperly working autoclave), then they just go straight to fail. Much as it is now. As far as minor infractions (not having dishwashing gloves on hand, having too strong an alcohol on hand), these can be corrected nearly immediately and pose no direct threat, and therefore needn't be marred with a yellow mark. Perhaps a call to ensure that the situation is corrected? This is essentially how things go at present, and there has been little to suggest that the system is out of whack. But a nice little annual certificate that states that we are in good standing would be great.

Perhaps further to that end, we could use some of the revenue from licensing to set up a website that lists all of the shops that are in compliance, those who have been found to have serious infractions (in order to ensure their continued safety). This site can also have a wealth of information for artists and clients alike regarding standards and what to look for. For a very reasonable amount of money, a website of a positive nature would be great PR for both the tattoo community as well as the city and TPH and show that we are working together toward the protection of the public.

3. Possible Response of PSS Businesses

Based on your knowledge of PSS establishments, can you provide insights on the response of **PSS businesses** re: the positives, challenges, issues of concern and desired supports related to each of the recommendations?

As covered at the head of this response, we feel that the great majority are in a position of acquiescence at least. And frankly, communications like these go a long way in eliciting compliance and thwarting resistance. If the city is to impose licensing fees for the purpose of raising health and safety standards and continuing positive work in this direction, then you find that the majority will be in support. If it is seen simply as an annual cash-grab, you may find a different, less co-operative temper amongst some members of the community. Continued communication and mutual co-operation should be the goal. We hope, in short, that this proposal carries meaning and weight with it.

4. Key Leaders

Given your knowledge of the PSS sector, can you suggest some key leaders or organizations from who we can gather further insight on the proposed amendments before they are presented for broad industry consultation in the Fall?

5. Reaching PPS Sectors

Given your knowledge of the PSS sector, can you suggest methods of reaching PSS providers, and encouraging their feedback on the proposed changes?

(In answer to numbers 4 and 5) The committee that met on August 21st (you will find a list of names attached) to discuss this survey is a group that is wide reaching and that has the ears of the great majority of the legitimate tattoo community in the GTA. We are communicating our discussions with the city, TPH and one another to a large group and gathering input from them as well. As our organization grows, we will be approaching as many people as we can through social media and on a personal level. Two of our members at present run the tattoos.com website and the annual convention in Toronto (Northern Ink Exposure). Other members have contacts reaching deep into the community and spanning decades. Other than that...you can always try the Yellow Pages.

6. Other Information

Is there other information that you would like to discuss with us?

We do have concerns regarding the logistics of licensing for conventions. Is this going to be feasible without disrupting this very important event to our community? How will it work with the visiting artists or with artists who visit and do guest spots at shops in general? As well, will there be zoning issues with people who set aside a space in the home (it being an art-form as well as a business, often practitioners choose some unconventional locales)? Many others will come to mind, to be sure, but we're sure that everything can be worked out in the end.

GTТА Members In Attendance on August 21st, 2001:

- Stu Kay Lower East Side Tattoos and tattoos.com
- Damian McGrath Northern Ink Exposure (Toronto convention) and tattoos.com
- Jamie Izumi Tora Tattoos, Waterloo, Ontario
- Dr. John Goodhew GP, Toronto, ON
- Warren Hiller Sterile Tech, Hospital for Sick Children
- David Naughton Great Canadian Tattoo Co., Toronto
- David Smedley Great Canadian Tattoo Co., Toronto
- Bill Read Abstract Arts, Toronto
- Mark Naraine Abstract Arts, Toronto
- Matthew Ellis Seven Crowns Tattoo, Toronto
- George Brown Seven Crowns Tattoo, Toronto