



DEPARTMENT OF ADMINISTRATIVE SERVICES

PROPOSED CHANGE OF THE CONNECTICUT STATE
BUILDING CODE AND FIRE SAFETY CODE

DATE SUBMITTED: _____

CODE INFORMATION

Proposed change to: ☐ Building Code ☐ Fire Safety Code

Code section(s): _____

PROPONENT INFORMATION

Name: _____ Representing: _____

Telephone: _____ Email: _____

Address: _____
Street Address Town State Zip Code

PROPOSAL INFORMATION

Description of change and reason for change (attach additional information as needed):

Proposed text change, addition or deletion (attach additional information as needed):

Supporting data and documents (attach additional information as needed)

☐ **This Proposal is original material.** (Note: Original material is considered to be the submitter's own idea based on or as a result of his/her own experience, thought or research and, to the best of his/her knowledge, is not copied from another source.)

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Proponent's Signature

Printed Name

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12/29/16



Northeast Spa & Pool Association

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PROPOSED CHANGE OF THE CONNECTICUT STATE BUILDING CODE AND FIRE SAFETY CODE

2024 International Swimming Pool & Spa Code | Section 305 Barrier Requirements

CURRENT CODE

305.1 General

The provisions of this section shall apply to the design of barriers for restricting entry into areas having pools and spas. Where spas or hot tubs are equipped with a lockable safety cover complying with ASTM F1346 and swimming pools are equipped with a powered safety cover that complies with ASTM F1346, the areas of those spas, hot tubs, or pools shall not be required to comply with Sections 305.1 through 305.7.

PROPOSED CHANGE

305.1 General

The provisions of this section shall apply to the design of barriers for restricting entry into areas having pools and spas. Where spas or hot tubs are equipped with a lockable safety cover complying with ASTM F1346 ~~and swimming pools are equipped with a powered safety cover that complies with ASTM F1346~~, the areas of those spas, hot tubs, ~~or pools~~ shall not be required to comply with Sections 305.1 through 305.7.

SUMMARY

In its unedited form, the International Pool and Spa Code (ISPSC) allows for an exemption from fencing requirements if a pool is equipped with a powered safety cover that complies with ASTM F1346. However, this important exemption has been removed during the



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adoption and revision of state building codes in states with similar population densities as Connecticut.

In New Jersey, for example, the 2021 Swimming Pool & Spa Code (Chapter 3) emphasizes strict general compliance for pool safety, underscoring the state's commitment to minimizing risks associated with swimming pools and spas.

New Jersey Swimming Pool and Spa Code 2021

305.1 General

The provisions of this section shall apply to the design of barriers for restricting entry into areas having pools and spas. Where spas or hot tubs are equipped with a lockable *safety cover* complying with ASTM F1346, the areas where those spas, or hot tubs are located shall not be required to comply with Sections 305.2 through 305.7.

https://up.codes/viewer/new_jersey/ispssc-2021/chapter/3/general-compliance#305.1

POSITION

While we fully support the ISPSC as a foundational safety standard, the Connecticut Swimming Pool and Spa Association (CONSPA) and the Northeast Spa and Pool Association (NESPA) strongly urge the removal of the automatic cover exemption from Connecticut's adoption of the 2024 ISPSC.

In densely populated states like Connecticut, the mandatory fencing requirement during the permitting process for new pool constructions has contributed to some of the lowest drowning rates in the nation.

According to the Centers for Disease Control and Prevention (CDC), barriers like fencing are essential in preventing drowning, as they significantly reduce access to pools when supervision is not present.



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Furthermore, while automatic safety covers provide an additional layer of protection, they are not infallible. Their effectiveness hinges on consistent, proper usage and regular maintenance, which can vary widely among homeowners. This variability highlights the need for fencing to be the primary barrier. Fencing and gates that comply with existing code requirements are critical, reliable safety measures, ensuring robust protection against unauthorized access, particularly by children.

SUPPORT

- The National Drowning Prevention Alliance (NDPA) lists fencing as a best practice and indicates that 70% of drownings happen during non-swimming times.
- The Center for Disease Control (CDC), in multiple articles and press releases regarding the increase in drowning incidents, routinely references the use of barriers and access to swimming lessons as key prevention techniques.
- The [Virginia Graeme Baker Pool and Spa Safety Act](#) defines a barrier as a natural or constructed topographical feature that prevents unpermitted access by children to a swimming pool and, with respect to a hot tub, a lockable cover.
- The Pool and Hot Tub Alliance's "Layer of Protection" strategy lists fence barriers as one of its critical physical layers to prevent children's unwanted access to the pool area.

In conclusion, reinforcing using fencing as the primary barrier in Connecticut's building codes aligns with national best practices and upholds our collective responsibility to safeguard the lives of our community's most vulnerable members.