

22 June 2021

s9(2)(a)



Thank you for your email of 17 May 2021 to Kāinga Ora – Homes and Communities requesting the following information under the Official Information Act 1982 (the Act):

1. *The total number of Housing NZ properties;*
2. *Of that total, the current number of properties that are known to contain some degree of lead-based paint.*
3. *Whether soil tests have been carried out on these properties to check the lead levels in the surrounding soil.*
4. *If tests have been carried out, a) what is the range of readings, b) what is the average reading and c) how many of those properties have lead readings above recommended levels.*
5. *Whether there is a plan in place to remove this lead-based paint a) from the houses, b) from the surrounding soil and c) if so, the time frame for that removal.*

The following commentary is provided as context to be read in conjunction with this response. Kāinga Ora relies on independent experts and specialists in various fields to determine its approach and response to managing the healthy environments of its properties. For example, advice available from the Ministry of Health. The historic use of lead within the paint industry means that the problems associated with paint containing lead applies to all New Zealand homes as follows:

*It may be assumed that pre-1945 interior or exterior domestic paintwork contains a high lead content; pre-1965 paintwork probably does, while pre-1980 paintwork possibly does. Post-1980 paintwork may generally be assumed to have a very low lead content, unless old stock or industrial specification paint was used (inappropriately)<sup>1</sup>*

Kāinga Ora is not able to state, with certainty, how many properties have paint containing lead. The independent advice available indicates a general acceptance that while a lead-containing paint film is intact, it presents no hazard.<sup>2</sup> However, Kāinga Ora ‘assumes’ the presence of paint containing lead in all properties constructed or installed before 1 January 1997, and takes appropriate precautions, unless records are available confirming the absence of paint containing lead throughout the home. Based on this assumption, the responses to your questions are as follows:

- 1) As at 30 April 2021 Kāinga Ora has 67,922 properties.
- 2) Of these properties, up to 51,284 are considered to have lead-based paint as Kāinga Ora assumes the presence of lead paint in all properties predating 1 January 1997. **NOTE:** it would **not** be appropriate to say that all 51,284 properties actually have paint containing lead, because until all parts of every house have been comprehensively tested, we cannot be certain.

<sup>1</sup> <https://www.health.govt.nz/system/files/documents/publications/environmental-case-management-lead-exposed-persons-revised-feb2012.pdf> -[p3]

<sup>2</sup> Ibid - [p4]

In relation to your questions 3 and 4, I can advise that Kāinga Ora does not routinely test soil for lead unless there is a specific reason to do so. We also do not have a specific work code to record soil tests for lead. Both of these requests are therefore declined under section 18(g) of the Act as the information requested is not held.

In response to your question 5, Kāinga Ora has a policy that outlines the management and control of paint containing lead (PCL), but we have no plans to remove all PCL from our homes, or soil, unless there is a specific reason. Below is an extract from our policy that explains this:

*'Paint containing lead in good condition that remains undisturbed presents little or no health risk. The presence of PCL is a potential health risk if it:*

- *is disturbed or removed by inappropriate methods*
- *is an advanced state of deterioration such as chalking, flaking, powdering, peeling or chipping*
- *could be accessed and chewed on or ingested by children or pets*
- *is present on a friction or impact surface such as a sash window, window jamb or exterior floor. On these surfaces the paint can be disturbed by daily activities such as the sash closing on the sill and foot traffic on the floor.'*

You have the right to seek an investigation and review by the Ombudsman of this response. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or Freephone 0800 802 602.

Yours sincerely



Rachel Kelly  
**Manager Government Relations**