

Appendix A - Addressing Residential Lead: Evidence and Policy Considerations for Government Action

Background

Protecting people and specifically children from exposure to lead is important to lifelong good health. Lead is a contaminant that affects multiple parts of the body. There is no level of exposure to lead that is known to be without harmful effects. If undetected and untreated, lead exposure in children can have irreversible neurobehavioral and developmental effects, causing learning and behavioural problems that continue into adulthood. Internationally, lead exposure remains a significant public health concern with high exposure associated with multiple facets of inequality.

In New Zealand, the dominant exposure to lead in a residential environment is via the historical indoor and outdoor use of lead-based paints. When old paint is removed, or if old painted surfaces are poorly maintained, lead may settle in dust or soil. Contaminated land investigations provide clear evidence of the relationship between housing age and elevated soil lead concentrations. However, exposure to lead is challenging to detect based on health symptoms alone and lead exposure in New Zealand is therefore likely to be under-estimated.

Our Position

The WasteMINZ Residential Lead Working Group recognises three major areas related to the exposure of residential lead that require urgent action:

1. **Leadership and coordination:** A multitude of entities and individuals have some role in lead exposure management (see Appendix C). They are guided by a myriad of legislation and guidance, with no agency accountable for ensuring the whole system works, and no stated goal to protect New Zealanders against exposure to lead.
2. **Research and monitoring:** High level surveillance alongside prevalence testing (in high-risk areas with older housing or other risk factors) is needed to assess children's current lead exposure. Blood lead level data is poor, almost solely occupational, and not publicly available for children under 5.
3. **Advocacy and proactive measures:** Regulation and guidance is sporadic and often outdated. There are opportunities to raise awareness of lead to empower and protect tenants, homeowners, painters and most importantly children.

These three elements are all critical to the **level** of intervention required to minimise and manage exposure of children to lead. Understanding the relative contribution of different sources of lead will help inform the **types** of interventions that will most effectively reduce exposure.

The contaminated land management sector has a particular interest in the management or remediation of soils with elevated lead being commensurate with the level of risk posed by these soils, and that this action is consistent with health advice.

We call for a **proactive cohesive** approach, led by a single agency, with oversight of relevant sectors and agencies across New Zealand to manage lead exposure in residential settings. This agency may be one that currently exists, such as the Ministry of Health; or one yet to be established, similar to the UK Lead Exposure Public Health Interventions and Surveillance working group (est. 2021). It should set goals and objectives and ensure accountability for all parties working towards these.

Table 1 below provides an overview of the three major areas of action identified, supporting evidence our Working Group has collated over the years, and some suggested policy actions for the Government to consider going forward.

Table 1. Overview action areas, supporting evidence and policy considerations

Action Area identified:	Evidence provided in Appendices:	Policy considerations:
1. Leadership and coordination	C: Current Roles and Responsibilities - The Lead Web	<ul style="list-style-type: none"> Form an 'all-of-government' group to manage this issue; similar to the US taskforce or UK's Lead Exposure Public Health Interventions and Surveillance working group. Formally assign roles and responsibilities.
2. Research and monitoring Global studies show lead paint still impacts health; while NZ has high soil lead and indications of health impacts, we have little/no blood lead data.	D: History of Lead In NZ E: Available Residential Soil, Household Dust, Blood, and Other Lead Data in New Zealand F: Kainga Ora Housing New Zealand Conceptual Site Model (2024) G: US Position of Human Health Risks from Lead (Pb) Exposure H: UK Human Health Risks from Lead (Pb) Exposure I: Australia - Current Position of Human Health Risks from Lead (Pb) Exposure J: Tenancy Tribunal Order	<ul style="list-style-type: none"> Understand blood lead in New Zealand children, particularly in low socio-economic communities; to enable an informed decision whether national screening or targeted monitoring programmes are warranted.
3.1 Advocacy and proactive measures - inconsistent and ineffective management processes.	K: WasteMINZ Residential Lead Working Group HAIL submission L: Regulatory tools to manage lead-based paint contamination M: Challenges in managing risks from lead-based paint contamination	<ul style="list-style-type: none"> Use the 'all-of-government' group to determine when and how testing is triggered, and how properties are managed into the future. Ensure all government housing has minimal lead risk and then ensure landlords do the same.
3.2 Advocacy and proactive measures - guidelines used for the management of lead by agencies are inconsistent and based on different (sometimes outdated) baseline data sources	N: Inconsistencies in toxicological foundations of NZ guideline values	<ul style="list-style-type: none"> Convene technical advisory group to reassess available data and work with central government agencies to ensure consistent guideline foundations (WorkSafe, NZDWS, Soil standards).

3.3 Advocacy and proactive measure - poor information available to support the general public to take action	O: Lead paint removal guidance in New Zealand P: DIY Lead Paint Detection Methods and Availability	<ul style="list-style-type: none"> • Revise and align public health guidance. • Ensure lead paint management guidance is available to the public. • Ensure information to manage soil lead contamination is available. • Ensure lead paint test kits and paint testing services are available.
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Appendices attached:

[B: WasteMINZ Open Letter to the Ministers 2024](#)

[C: Current Roles and Responsibilities - The Lead Web](#)

[D: History of Lead In NZ](#)

[E: Available Residential Soil, Household Dust, Blood, and Other Lead Data in New Zealand](#)

[F: Kainga Ora Housing New Zealand Conceptual Site Model \(2024\)](#)

[G: Current Position of Human Health Risks from Lead \(Pb\) Exposure in the United States](#)

[H: Current Position of Human Health Risks from Lead \(Pb\) Exposure in the United Kingdom](#)

[I: Current Position of Human Health Risks from Lead \(Pb\) Exposure in Australia](#)

[J: Tenancy Tribunal Order](#)

[K: WasteMINZ Residential Lead Working Group HAIL submission](#)

[L: Regulatory tools to manage lead-based paint contamination](#)

[M: Challenges in managing risks from lead-based paint contamination](#)

[N: Inconsistencies in toxicological foundations of NZ guideline values](#)

[O: Lead paint removal guidance in New Zealand](#)

[P: DIY Lead Paint Detection Methods and Availability](#)

[Q: WasteMINZ Residential Lead Working Group Position Statement](#)

Disclaimer

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If the reader is uncertain about issues raised in this research, they should seek further advice from independent experts.