



Ministry for the
Environment
Manatū Mō Te Taiao

Summary of recommendations and the Minister for the Environment's decisions on amendments to the National Policy Statement for Freshwater Management 2014

AS PROPOSED THROUGH THE CLEAN WATER
DISCUSSION DOCUMENT 2017

This report fulfils the requirements of Section 52(3)(c) of the Resource Management Act 1991

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Introduction

The Government's intention to amend the National Policy Statement for Freshwater Management 2014 (Freshwater NPS) was announced with the release of the *Next steps for fresh water* discussion document in February 2016.

The Minister for the Environment (the Minister) decided not to appoint a Board of Inquiry and instead established, and used, a process under section 46A(1)(b) of the Resource Management Act 1991. The process was administered by the Ministry for the Environment. The proposed amendments were publically notified in February 2017 through the [Clean Water discussion document](#).

As required by section 52(1)(a) of the Resource Management Act 1991, a [Submissions report and recommendations on proposed amendments to the National Policy Statement for Freshwater Management 2014](#) (the Submissions report)¹ was provided to the Minister in July 2017.

After considering the Submissions report the Minister made changes to the amendments as proposed through the *Clean Water* document. Following this the Minister recommended the resulting *National Policy Statement for Freshwater Management 2014 (as amended 2017)* to the Governor General, who approved it on 7 August 2017. The National Policy Statement for Freshwater Management Amendment Order 2017 was subsequently gazetted on 9 August 2017 and will take effect on 6 September (the 28th day after the day of Gazettal).

Section 52(3)(c) of the Resource Management Act 1991 requires the Minister, as soon as practicable after a National Policy Statement has been approved (or amended), to provide every person who made a submission with a summary of the recommendations and a summary of the Minister's decisions on the recommendations (including reasons for not adopting any recommendations).

This document, prepared by the Ministry for the Environment on behalf of the Minister, provides that summary.

¹ Ministry for the Environment. August 2017. *Submissions report and recommendations on proposed amendments to the National Policy Statement for Freshwater Management 2014*.

Summary of recommendations and Minister's decision

The *Submissions report and recommendations on proposed amendments to the National Policy Statement for Freshwater Management 2014* (the Submissions report) recommended a number of changes arising from submitter feedback to the proposals consulted on in the *Clean Water* discussion document. Some recommended changes were presented as options for the Minister to consider.

The Minister considered the Submissions report, and made decisions on the recommendations. This has resulted in changes to the Freshwater NPS, which in some cases differ to the proposals consulted on through the *Clean Water* discussion document.

Amendments have been substantial in some instances (eg, incorporating the national swimming targets into the Freshwater NPS) and minor in others (eg, small changes to wording to improve workability in practice).

The recommendations of the Submissions report and the Minister's decisions are summarised in this document. The tables compare the recommendations provided to the Minister (left column), with the final decision made by the Minister in the right column. Where the Minister's decisions differ from the recommendation, reasons have been provided. A full discussion on the reason for the recommendations can be found in the Submissions report.

This document should be read in conjunction with the [Clean Water discussion document](#), the [Submissions report](#), and the [Freshwater NPS \(as amended 2017\)](#).

The format of this document groups the proposals into themes and follows, where possible, the sequencing in the Freshwater NPS.

Preamble, Review and Interpretation sections

Recommendation	Summary of, and key reasons for, Minister's decision
<p>Amend the proposed Preamble to reflect the final amendments to the NPS-FM.</p>	<p>The Minister agreed to amend the Preamble to reflect the final amendments to the Freshwater NPS.</p>
<p>Amend the Review section to update and signal the next review date.</p>	<p>The Minister agreed to set a new date for a review of the implementation of the Freshwater NPS of 2020. The Minister also amended the original text which referenced the collection of monitoring data (<i>Collection of monitoring data to inform this review will begin at least two years prior to the review</i>). This was removed because it is redundant – various monitoring data has been collected on the Freshwater NPS since it came into effect in 2011.</p>
<p>Amend the Interpretation section as relevant to support and reflect the policy changes, and to assist with interpretation.</p>	<p>The Minister agreed to make amendments to the Interpretation section.</p> <p>This includes removing the definition proposed in <i>Clean Water</i> for “Contact with fresh water” and “immersion”. This is no longer required as all references to swimming have been replaced with a single term “primary contact”.</p>

Te Mana o te Wai

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>Amend the Freshwater NPS to emphasise that all national values must be considered as part of the national objectives framework. By:</p> <p>Amending the heading “extractive uses” under the Additional National Values of Appendix 1 to: “productive values” OR “use values”.</p> <p>OR</p> <p>Amend proposed changes to Appendix 1 (values) of the Freshwater NPS so all values listed under the heading “extractive uses” are listed under Te Hauora o te Tāngata.</p> <p>OR</p> <p>Amend proposed changes to Appendix 1 (values) of the Freshwater NPS to remove all headings categorising national values.</p>	<p>The Minister agreed to amend Appendix 1 of the Freshwater NPS by removing the headings in Appendix 1 categorising national values (the last option).</p> <p>This change was made to address the perception of a hierarchy in the values so it is clear that all national values must be considered as part of the National Objectives Framework. Of all the options, this change was considered the most effective way to achieve this.</p>
<p>Amend proposed Policy CA2 to replace the word ‘following’ with ‘through’ as follows:</p> <p><i>“By every regional council, <u>through</u> discussion with communities, including tāngata whenua, applying the following process in developing freshwater objectives for all freshwater management units”.</i></p>	<p>The Minister agreed to the recommended change to Policy CA2. The change ensures the text reflects the National Objectives Framework process, in terms of it involving a conversation with communities, including tangata whenua, not separately or ‘after’ community engagement.</p>
<p>For all other proposals relating to Te Mana o te Wai, proceed as set out in <i>Clean Water</i>, including.</p> <ul style="list-style-type: none"> • a new statement on the National significance of freshwater and Te Mana o te Wai • a new objective AA1 and Policy AA1 • a monitoring requirement to use Maturanga Māori • a requirement in Part C Integrated Management to recognise the interactions, ki uta ki tai (from the mountains to the sea) between fresh water, land, associated ecosystems and the sea • amend the descriptions of the value “Human health for recreation” and “Natural Form and Character” to better align with Te Mana o te Wai. 	<p>The Minister agreed to proceed with the changes as consulted on.</p>

Swimming and the national targets

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>In response to submissions, and subsequent discussions with members of the Land and Water Forum, directly incorporate the (non-regulatory) national target as proposed in <i>Clean Water</i>, into an appendix of the Freshwater NPS, and explicitly refer to this when stating requirements to improve water quality for swimming in Objective A3 and/or Policy A5.</p>	<p>The Minister agreed to include the national swimming targets into the Freshwater NPS through Appendix 6 (new) to make them part of the regulation (rather than aspirational) and to help ensure the targets are met.</p> <p>The Minister chose to expand on the recommendations, and introduce a requirement to set regional targets that contribute to the national target (policy A6). By setting regional targets, regional councils can be held accountable for their individual contributions to achieving the national target.</p> <p>Objective A3 is silent on the national targets, but it is referenced in Policy A6 which requires regional targets that will contribute to the national target. This was considered the best way to incorporate the swimming targets and provide a way for councils to contribute to achieving them.</p> <p>The Minister made this decision to address concerns in submissions, including from members of the Land and Water Forum, that without regulatory force the national targets would not be achieved.</p>
<p>Amend Objective A3, Policy A5, Policy CA2(f)(iaaa) and related definitions to use the term “primary contact” instead of “immersion” “contact with fresh water” or other references to swimming.</p> <p>AND</p> <p>Define “primary contact” in the interpretation section.</p>	<p>The Minister agreed to these recommendations to refine and clarify the language used. Note changes to numbering mean the relevant policy notation is now CA2(f)(iaa).</p>
<p>The <i>Clean Water</i> proposals included a new direction to improve water quality for swimming in Objective A3, Policies A5 and CA2(f)(iaaa) and a definition of “large rivers and lakes” for this purpose. Submitters were concerned that this would exclude some water bodies used for swimming and capture others that weren’t. Recommendations to address these concerns are:</p> <p>Amend proposals so that Objective A3, Policy A5 and Policy CA2(f)(iaaa) apply to 3rd order water bodies.</p> <p>OR</p> <p>Amend proposals so that Objective A3, Policy A5 and Policy CA2(f)(iaaa) apply to all water bodies.</p>	<p>The Minister agreed that Objective A3 should apply across a freshwater management unit, and Policy A5 and CA2(f)(iaa) to ‘specified’ rivers and lakes (as defined in the interpretation section) and any other primary contact site identified by regional councils.</p> <p>This change is to better accommodate the inclusion of the national targets into the Freshwater NPS and address the concern that the proposed wording would make the targets apply to water bodies which were not used for primary contact (or wouldn’t apply where they were used).</p> <p>Councils must improve water quality in all freshwater management units and primary contact sites, even though these do not contribute to the national target.</p>
<p>Amend proposals so regional councils must identify sites used for primary contact and improve these sites – in addition to all lakes and rivers that are fourth order or larger.</p>	<p>The Minister agreed that new Policy A5 should require regional councils to identify sites used for primary contact, in addition to lakes (with a circumference of 1.5 km) and rivers (that are fourth order or more).</p> <p>And:</p> <p>That councils would be required to state what improvements would be made, and over what timeframes, to specified rivers, lakes and primary contact sites so they are suitable for primary contact more often.</p>

Recommendation	Summary of, and key reasons for, Minister's decision
<p>Amend Policy CB1 by adding this monitoring requirement (instead of Policy CB1(aa)(i) as proposed): “establishes methods for monitoring the extent to which the values identified under Part CA2(b) are being provided for in a freshwater management unit. These methods must at least include:</p> <p>(i) surveillance monitoring of microbial health risks to people in accordance with the guidance in Appendix 5 (applies in a river or lake in a freshwater management unit used for primary contact)”.</p>	<p>The Minister agreed to make the surveillance monitoring of microbial health risks (ie the weekly sampling at swimming sites) apply at primary contact sites (not all rivers and lakes) and at the times these are used (see Appendix 5 of the NPS).</p> <p>The change addresses concerns from councils that the proposal in the Clean Water discussion document drafting would have required them to monitor all water bodies, and to undertake follow up daily sampling, regardless of whether they were used for primary contact.</p>
<p>Amend the narrative descriptions of each attribute band so they more clearly describe the actual risk to human health and address submitter concerns.</p>	<p>The Minister agreed with this recommendation, so the narrative risk column now describes the risk (%) of campylobacter infection (based on the indicator <i>E. coli</i>) over time.</p>
<p>Changes to the way “maintain or improve” is determined mean there is a risk that in terms of <i>E. coli</i> (because it no longer has a bottom line) water quality could continuously decline in the bottom band and still be considered to be “maintained”. To address this risk:</p> <p>EITHER</p> <p>Amend the proposed Policy CA2(e)(iia) of the Freshwater NPS to require water quality in the lowest attribute band to at least be maintained at current state (rather than a band) if there is no national bottom line.</p> <p>OR</p> <p>Amend Objective A3 so that it requires improvement in all water bodies.</p>	<p>The Minister agreed to amend Objective A3. It now requires improvement of <i>E. coli</i> in rivers and cyanobacteria in lakes in all freshwater management units so it is suitable for primary contact more often, unless naturally occurring processes mean further improvement is not possible or regional targets (set by councils and communities) are met.</p> <p>This change was made to address two concerns:</p> <p>Water bodies which are not part of the targets which already have poor water quality could have been allowed to degrade because of the decision to remove the national bottom line for <i>E. coli</i>.</p> <p>Water bodies would be allowed to degrade within a band because of the decision that “to maintain” means to stay within the current band.</p>
<p>Amend Objective A3 so it does not require improvement where water quality is already in the highest attribute band (note this issue is tied to the suitability of the A band, discussed in the section, “Stringency of the proposed attribute table” of the Submissions summary report).</p>	<p>This recommendation was amended following discussions with other agencies. Objective A3 was changed to require water quality to be improved <u>until regional targets are met</u>.</p> <p>The Minister wanted water quality to improve across all categories but rather than leaving it open ended, decided to place a cap on the amount of improvement required (after which water quality must be maintained). In this way communities can decide the level at which improvement can stop rather than requiring continuous on-going improvement.</p> <p>Policy A6 requires councils, to set regional targets by the end of 2018. It is expected that councils will do this in consultation with their communities. The regional targets must contribute to the national target but there is room for communities to decide exactly where, when and by how much water quality must improve.</p> <p>This provides flexibility for councils and communities while providing transparency about where improvement will be made and by how much. They can choose the individual catchments and how they will meet their regional targets (which in turn contribute to achieving the national target) .</p>

Recommendation	Summary of, and key reasons for, Minister's decision
<p>Include an additional attribute band (A+), which is equivalent to the existing A attribute band, to address the possibility of water quality declining within the A band (with the introduction of the new provisions for “maintaining water quality”).</p>	<p>The Minister did not agree to proceed with this recommendation, because the new requirement to improve in Objective A3 (above) achieves the outcome sought by this provision, making it redundant.</p>
<p>Replace the proposed Appendix 5 with a new appendix as follows:</p> <p>“Where a regional plan has identified that a freshwater management unit is used for primary contact the regional council will:</p> <p>a) Identify a sampling site (or sites) in the freshwater management unit that is representative of the site or sites (if any) that are used for primary contact;</p> <p>b) Identify the bathing season that the site or sites will be used for primary contact;</p> <p>c) Undertake weekly sampling for the indicator bacteria <i>E. coli</i> at the site or sites that will be used for primary contact during the bathing season</p> <p>d) Investigate potential causes of microbiological contamination if a single sample is greater than 260 <i>E. coli</i> per 100ml</p> <p>e) Inform the public that a site is unsuitable for recreation if a sample from the site is greater than 540 <i>E. coli</i> per 100ml, and maintain that information until sampling shows results of less than 540 <i>E. coli</i> per 100ml (note that if no follow-up sampling is undertaken, the public information that the site is unsuitable for recreation must be maintained).</p>	<p>The Minister agreed to the recommendations and also took further advice from the Ministry of Health before making final decisions. This resulted in a change to the recommendation c). The frequency of sampling required under c) is now that, if a single sample is greater than 260 <i>E. coli</i> per 100 ml, the sampling frequency <u>must increase from weekly to daily, where practicable</u> (see Appendix 5).</p>
<p>Amend the proposed changes to Appendix 2 (attributes) of the Freshwater NPS relating to the <i>E. coli</i> attribute, to include four columns (‘tests’) that must be satisfied to determine attribute state, measuring: exceedances of 540 <i>E. coli</i> per 100ml; exceedances of 260 <i>E. coli</i> per 100ml; and whether the median is above or below 130 <i>E. coli</i> per 100ml and the 95th percentile test.</p> <p>AND</p> <p>Specify that the 95th percentile test cannot be modelled, and does not apply to the national swimming target if there is insufficient monitoring to establish the 95th percentile concentration.</p> <p>Add a footnote to the attribute table: “All tests within an attribute band must be satisfied to determine attribute state”.</p> <p>Amend the footnote to the attribute table so attribute state is established according to 60 samples over 5 years regardless of weather and flow conditions.</p>	<p>The Minister agreed to proceed with these recommendations and the <i>E. coli</i> attribute table has been amended to reflect the recommendations.</p> <p>Note that the 95th percentile is one of four ‘tests’ used when assigning an <i>E. coli</i> attribute state to freshwater management units and undertaking representative monitoring.</p> <p>However, the Minister has agreed to specify that the 95th percentile test does not apply to assessing progress toward the national swimming target if there is insufficient monitoring data for a specified river or lake under the national swimming target (see Appendix 6 of the Freshwater NPS).</p> <p>This recognises that the national target applies to individual water bodies where monitoring data may not be sufficient.</p>

Water Quality – Objective A1

Recommendation	Summary of, and key reasons for, Minister’s decision
Proceed as proposed in <i>Clean Water</i> .	The Minister agreed to proceed with the changes as consulted on.

Maintain or improve – Objective A2 and Policy CA2

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>Proceed as proposed in <i>Clean Water</i>.</p> <p>Note: for proposed changes to Objective A2 regarding economic well-being see the table specific to this below.</p>	<p>The Minister agreed to proceed with the changes as consulted on to maintain or improve water quality within a freshwater management unit.</p> <p>The Minister also agreed to the proposal for Policy CA2 which now requires that to maintain water quality, freshwater objectives must be set within the same attribute band as existing water quality or, where councils establish their own attributes other than those in the NPS (so there are no bands) so that the values they provide for will not be worse off.</p> <p>This is considered the best way to provide clarity for councils, and communities, on what it means to maintain water quality.</p>

Economic well-being

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>EITHER</p> <p>Remove proposed amendments related to providing for economic well-being. This includes the proposed changes to Objective A2, B1 and Policy CA2 (f)(iaaab).</p> <p>OR</p> <p>Remove proposed amendments to Objective A2 and B1 but retain amendment to Policy CA2 (f)(iaaab).</p> <p>OR</p> <p>Move proposed amendments into standalone objectives, and optionally, policies.</p> <p>AND</p> <p>Amend Policy CA2(f)(iaab) to remove reference to within “the context of environmental” limits, so it just says “within limits” – to reflect the objectives and policies.</p>	<p>The Minister agreed to move the proposed amendments into standalone objectives (Objective A4 and B5) and supporting policies (Policy A7 and B8).</p> <p>The Minister also agreed to amend Policy CA2 (f)(iab) (note new numbering) so it now reads;</p> <p><i>“how to enable communities to provide for their economic well-being, including productive economic opportunities, while managing within limits”.</i></p> <p>These drafting changes were made to address concerns that the proposal in <i>Clean Water</i> changed the priority given to economic well-being priority that was inconsistent with the Resource Management Act 1991.</p> <p>The changes better express the balance of considerations intended to be part of the values and freshwater objective setting process.</p>

Exceptions to national bottom lines – Policy CA3

Recommendation	Summary of, and key reasons for, Minister's decision
Remove definition of “benefits of infrastructure” as proposed in <i>Clean Water</i> and rely on definition of “benefits” provided in the RMA.	The Minister agreed to remove the proposed definition and rely instead on the RMA definition.
Retain the requirement that the infrastructure ‘contributes’ to the water quality issue.	The Minister agreed to the recommendations so that Policy CA3 is clear on the circumstances that exceptions for infrastructure can be applied. Some minor wording changes were made to improve readability by reducing unnecessary words.
Do not exempt lakes created by mining operations from national bottom lines.	
Develop a process for populating Appendix 3 with the intention of undertaking public consultation on a proposed list in the next year.	The Minister agreed that the Ministry for the Environment in consultation with the Ministry for Business, Innovation and Employment and other relevant ministries will publish a timetable by September 2017 outlining the process for populating Appendix 3.

Monitoring Plans (Part CB)

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>EITHER</p> <p>Amend proposed changes to Part CB of the Freshwater NPS, consistent with Land and Water Forum (LAWF) recommendations, to:</p> <p>mandate the use of the Macroinvertebrate Community Index (MCI) specifically</p> <p>specify that a MCI score of 80, or a declining trend, triggers the already proposed requirement to develop methods (eg, action plans) to respond</p> <p>require methods (eg, action plans) to investigate the causes of declining trends of breaches of 80 MCI; seek to halt declining trends; and seek to improve water quality that is below 80 MCI unless this is caused by naturally occurring processes, invasive species, or infrastructure listed in Appendix 3.</p> <p>OR</p> <p>Amend proposed changes to Policy CB1 of the Freshwater NPS, to:</p> <p>require regional councils to set their own numeric thresholds for macroinvertebrate monitoring, which will trigger already proposed requirement to develop methods (eg, action plans) to respond</p> <p>suggest that the MCI may be a suitable index for this purpose</p> <p>specify that if regional councils use MCI for this purpose, the threshold must be a score of 80 or a declining trend.</p>	<p>The Minister agreed to the first option, to expand on proposals and mandate the use of MCI, and that a score of 80 or a declining trend should trigger an action plan detailing what steps will be taken to address the issue (unless the caveats apply).</p> <p>See new policy CB3.</p> <p>The Minister did not proceed with the second option because of the strong desire expressed in submissions for the use of MCI to be mandated.</p>
<p>Amend proposed changes for <i>E. coli</i> monitoring as follows:</p> <p>“Surveillance monitoring of microbial health risks to people in accordance with the guidance in Appendix 5 (applies in a river or lake in a freshwater management unit used for primary contact)”.</p>	<p>The Minister agreed to change this monitoring requirement to make it clear that the monitoring specified in Appendix 5 is surveillance monitoring, rather than <i>E. coli</i> exceedances over time, which is relevant to grading monitoring.</p> <p>The Minister changed the requirement to make it clear that surveillance is mandatory for primary contact sites.</p>
<p>For all other proposals relating to Part CB proceed as set out in <i>Clean Water</i>.</p>	<p>The Minister agreed to proceed with the changes as consulted on.</p>

Progressive implementation programme – Part E

Recommendation	Summary of, and key reasons for, Minister’s decision
<p>Proceed with changes to Policy E1 (f) as consulted on in <i>Clean Water</i>.</p>	<p>The Minister agreed to proceed with the changes as consulted on.</p>
<p>Amend the Freshwater NPS so regional councils are required to report on their contributions to achieving the national target at regular intervals.</p>	<p>The Minister agreed to include a new policy E1(g) requiring every regional council, at intervals of not more than five years, to compile and make available to the public a review of improvements to ‘specified’ rivers and lakes and primary contact sites identified under Policy A5.</p> <p>Policy E1 (g) was inserted to ensure reporting is undertaken to make information available to the public on how regions are progressing with Objective A3 (improvement toward regional targets) and Policy A5 (which relates to contributing to the national swimming targets).</p> <p>For this reporting councils will utilise the usual E.coli (and cyanobacteria in lakes) monitoring data they already collect. In addition councils will state what measures they have implemented to improve water quality for swimming (per Policy A5), such as improved riparian strips/fencing or water treatment upgrades.</p> <p>Policy E1(g) was intentionally drafted to be consistent with existing state of the environment (SOE) reporting requirements under the RMA.</p> <p>Councils already publish SOE monitoring data – this is exactly how the swimming maps are derived, and how councils are expected to report on progress. It is just about drawing the link between measures to improve rivers and lakes for swimming, and this data.</p>

Attributes (Appendix 2) – Coastal lakes and lagoons that intermittently open to the sea

Recommendation -	Summary of, and key reasons for, Minister's decision
<p>Delete the footnote to the Total Nitrogen attribute table for lakes as proposed.</p> <p>Add the following text to the attribute tables for phytoplankton, total nitrogen, and total phosphorus (rather than the proposed text):</p> <p>“For lakes and lagoons that are intermittently open to the sea, monitoring data should be analysed separately for closed periods and open periods”.</p> <p>AND</p> <p>Do not add the text “or additional phytoplankton and macroalgae” as proposed in the narrative description of the “C” state in the attribute tables for phytoplankton, total nitrogen, and total phosphorus.</p> <p>Add “(without native macrophyte/seagrass cover)” after “persistent, degraded state” instead of “(without macrophyte/seagrass cover)” as proposed in the narrative description of the “D” state in the attribute tables for phytoplankton, total nitrogen, and total phosphorus.</p>	<p>The Minister agreed to proceed with the proposed text changes to the Appendix 2 attribute tables relating to coastal lakes and lagoons, to address technical issues with monitoring requirements and narrative descriptors.</p> <p>AND</p> <p>The Minister agreed not to add the text proposed in the narrative description of the “C” state in the attribute tables for phytoplankton, total nitrogen, and total phosphorus.</p> <p>The Minister also agreed to add the recommended text to the “D” state in the attribute tables for phytoplankton, total nitrogen, and total phosphorus. These decisions were proposed, and the Minister supported them, on the basis of recommendations from experts in freshwater ecology.</p>

Attributes (Appendix 2) – Managing nitrogen and phosphorus

Recommendation -	Summary of, and key reasons for, Minister's decision
Remove the sentence referring to Nitrate Toxicity in the Periphyton 'Note' and move it to the Nitrate Toxicity table.	The Minister agreed to proceed with the recommendation. The proposed sentence was changed to make it clear that it applies only to toxic state and not trophic state.
Redraft the wording of the periphyton 'Note' to achieve a clearer policy intent.	The Minister agreed to significant changes to the notes of the Periphyton table. These are: a. The first paragraph of the note has been substantially revised to make it scientifically accurate.
Include a decision-support tool in the Freshwater NPS, based on advice from the Land and Water Forum.	b. The new paragraphs provide specific direction (a decision-support tool) to regional councils about the process they need to follow to appropriately manage nutrients which can substantially impact on periphyton (slime) growth. This direction is required to ensure councils are managing the periphyton attribute properly.