



To: Hon Amy Adams, Minister for the Environment
Hon Nathan Guy, Minister for Primary Industries

Freshwater Reform: Progressing a National Objectives Framework and other amendments to the National Policy Statement on Freshwater Management

Other Dept Tracking Number:	B-12-872	MfE Tracking Number:	13-B-01028
Date Submitted:		MfE Priority:	Urgent
Security Level:	IN CONFIDENCE	Number of Attachments:	Three
Action Sought:	Agreement	Response/Signature Needed by:	By 28 June 2013

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Executive Summary

1. The purpose of this paper is to:
 - a. describe the amendments to the National Policy Statement on Freshwater Management 2011 (NPS-FM) proposed for progression in 2013
 - b. describe the process being used for scientific and stakeholder input to the population of a National Objectives Framework (NOF)
 - c. describe the nature of the decisions required to populate a NOF and set national bottom lines, and how these decisions will be informed
 - d. seek your agreement to our recommended timeframe for progressing proposed amendments to the NPS-FM.
2. In December 2012, Cabinet agreed to publically engage on proposals to establish a regulated National Objectives Framework and national bottom lines (CAB Min (12) 44/6 refers), and guidance or direction on accounting for all water takes and sources of contaminants (CAB Min (12) 44/6 refers). Feedback received during public engagement in March 2013 on these proposals was generally positive and you plan to seek Cabinet agreement to release draft amendments to the NPS-FM that would implement these proposals as regulation. Proposed amendments would establish a NOF and national bottom lines, require accounting of all water takes and sources of contaminants, establish transitional provisions and clarify some existing matters.
3. The process being used for scientific and stakeholder input into Ministerial decisions on a NOF and national bottom lines includes engagement with a wide range of freshwater scientists and a NOF Reference Group made up of representatives from iwi, regional councils and other sectors, including primary industries and NGOs. We consider that

the process for scientific engagement and testing is robust enough to inform Ministerial agreement to detailed regulatory proposals.

4. Science-informed, Ministerial decisions on proposed population of a NOF will involve significant value judgments. The input of the NOF Reference Group will help inform these decisions, alongside analysis being undertaken to understand the impacts of different choices.
5. Debate in a number of different areas can be expected, but our view is that most of the debate will be around whether there should be regulated bottom lines and the level national bottom lines should be set at. This debate will be most constructive if it happens within a context that includes information on the impacts of different choices – this information can be provided during formal public consultation.
6. We currently have an economic impact study underway in the Waikato to inform Ministerial decisions on proposals for a NOF and national bottom lines. The preliminary results of this study will not be available until early-August 2013.
7. To allow Ministers to consider the preliminary results of the Waikato economic impact study, we recommend that Cabinet agreement to release proposals for consultation is sought in late August 2013, with a view to having an amended NPS-FM in force by March 2014.
8. There are some risks associated with this timeframe. These include:
 - a. overlaps with local body elections and the expected Select Committee period for the 2013 bill for resource management reform reducing the ability of some groups to meaningfully engage in all processes
 - b. limited time for the NOF Reference Group to test and debate proposals reducing their ownership of, and buy-in to, proposals
 - c. public criticism if a NOF and national bottom lines are not seen to be progressed in accordance with the timeframes in *Freshwater Reform 2013 and beyond*.

Situation Analysis

9. The National Policy Statement for Freshwater Management (NPS-FM) requires regional councils to set objectives and limits for all freshwater bodies by 2030 as an essential step toward improving the way fresh water is managed in New Zealand.
10. The April 2012 report of the Land and Water Forum (the Forum) and further work by an officials-led Reference Group recommended that a National Objectives Framework (NOF), including national bottom lines, be created to support regions in setting objectives and limits through providing a nationally consistent approach.
11. In December 2012, Cabinet agreed to publically engage on proposals to establish a regulated National Objectives Framework and national bottom lines (CAB Min (12) 44/6 refers). Feedback received during public engagement in March 2013 indicated strong support from all stakeholder groups for a NOF and national bottom lines (MfE 13-B-00627, MPI B12-694 refers).
12. We have previously advised you that the best means to implement a NOF is by amendment to the NPS-FM, with some amendment to the Resource Management Act 1991 (RMA) to ensure the ability to implement some aspects (eg to call-in exceptions from national bottom lines on some grounds) (MfE 13-B-00627, MPI B12-694 refers).
~~WITHHELD UNDER 9(2)(F)(IV)~~ You intend to seek Cabinet agreement to release draft amendments to the NPS-FM for consultation in the next few months (see below for our advised timeframe).
13. To inform Cabinet decisions on a NOF and national bottom lines we have a number of economic impacts studies underway with regional councils. The results from the Southland and Canterbury regional studies were presented to Ministers on 20 May

2013 (MfE 13-B-00942, MPI B12-662 refers). A further study is underway in the Waikato region.

14. In December 2012, Cabinet also agreed to publically engage on proposals to establish guidance or direction on accounting for all water takes and sources of contaminants (CAB Min (12) 44/6 refers). Our advice is that mandatory accounting for all water takes (quantity) and for all sources of the contaminant to be managed (quality) can be progressed through amendment to the NPS-FM at the same time as a NOF and national bottom lines are established (MfE 13-B-00511, MPI B12-639 refers).

Advice

15. The purpose of this paper is to:
 - a. describe the amendments to the NPS-FM proposed for progression in 2013
 - b. describe the process being used for scientific and stakeholder input to the population of a draft NOF
 - c. describe the nature of the decisions required to populate a NOF and set national bottom lines, and how these decisions will be informed
 - d. seek your agreement to our recommended timeframe for progressing proposed amendments to the NPS-FM.

Amendments to the NPS-FM proposed for progression in 2013

16. The proposed amendments to the NPS-FM to be progressed in 2013 are intended to:
 - a. establish a NOF and process for its use in objective-setting by councils
 - b. establish national bottom lines that need to be met over time in all water bodies (unless there is a justified exception)
 - c. partially populate the NOF with values, attributes and minimum states – further population will happen via future amendments to the NPS-FM
 - d. establish an exceptions regime, which includes criteria for when exceptions from national bottom lines may be permitted
 - e. require all water takes and sources of contaminants to be accounted for
 - f. clarify some matters in the NPS-FM, eg the coastal interface (particularly managing the impacts of fresh water on estuaries), and definitions of 'freshwater objectives' and 'limits'
 - g. specify transitional matters for councils that have already set objectives and limits, or are in the process of doing so.
17. You have previously been briefed on the National Objectives Framework, national bottom lines and exceptions regime (MfE 13-B-00627, MPI B12-694 refers) and accounting requirements (MfE 13-B-00511, MPI B12-639 refers). A further detailed briefing on these matters, potential clarifications (f above) and the transitional matters (g above) will be provided in early July 2013.

Process for scientific and stakeholder input to the population of a NOF

18. The process for scientific input into the population of a NOF and setting of national bottom lines involves engagement with a wide range of freshwater scientists (refer Appendix 1). This engagement with the scientific community is being co-ordinated and overseen by officials with scientific expertise. In general the approach includes:
 - a. Expert panels responsible for providing advice on each specific potential component of a NOF (eg sediment effects on ecosystem health). These

panels bring together a range of expertise and perspectives with the aim of reaching consensus amongst panel members on how a NOF could be populated.

- b. An Iwi Science Panel responsible for providing advice on the integration of tangata whenua values. This includes review of the work of the other panels, as well as input on aspects of a NOF that are more specific to tangata whenua values. This panel brings together a range of iwi scientists with the aim of reaching consensus amongst panel members. They will also provide advice directly to the Freshwater Iwi Advisers Group (Iwi Advisers).
 - c. A Scientific Review Panel which reviews the overall scientific input into officials work. The Review Panel is responsible for reviewing and testing the robustness of the approach and recommendations of each of the panels, and for ensuring cohesiveness and alignment of the scientific input as a whole.
19. In some cases (particularly relating to the toxicity and microbial contamination components) specific individual expertise has been drawn on. Although individual NZ experts have been called on, their work is based on internationally accepted approaches which have been well tested.
 20. Officials are continuing to work with the NOF Reference Group to develop the NOF and test policy options, including the approach being taken to develop and incorporate input from the scientific community. The NOF Reference Group includes representatives from iwi, regional councils and other sectors such as the primary industries and NGOs. They have a range of expertise which includes water science, water and land management, and resource management planning. See appendix 2 for members of the NOF Reference Group.
 21. It is not possible to fully populate a NOF with all values, attributes, minimum states and water body types in 2013 as further scientific research is needed in many cases. Scientific engagement will need to continue over the coming years to complete population of a NOF, with further iterations potentially being released in 2016 and 2019. Initial priority has been given to populating ecological health, human health, swimming, fishing and mahinga kai values, though not all attributes for these values will be able to be populated with minimum states in 2013. Other values such as irrigation and stock drinking water will be added in later iterations.

Decisions required in populating a NOF and setting national bottom lines

22. The table following lays out the areas for decision-making by Ministers in relation to the population of a NOF and national bottom lines, and how these decisions are informed:

Decision point	Type of decision	How informed	Evidence base for understanding impacts
Values and uses to be included.	Value judgement	National values list in NPS-FM preamble provides a starting point. Modifications informed by Iwi Advisers and NOF Reference Group.	Existing values and uses in regional plans.

Decision point	Type of decision	How informed	Evidence base for understanding impacts
Values and uses that are compulsory in all water bodies (national bottom lines).	Value judgment	NPS-FM objectives provide a starting point. Additions informed by Iwi Advisers and NOF Reference Group, building on the work of the Forum.	Existing values and uses in regional plans. Total economic impact of setting additional compulsory values at different levels.
Attributes that need to be managed in relation to each value or use.	Scientific judgment (largely)	Scientific advice from NOF science panels, including the Iwi Science and Review panels. NOF Reference Group views on stakeholder acceptance of scientific advice.	Existing attributes in regional plans. Alignment with National Environmental Monitoring and Reporting indicators (for 'state of the environment' monitoring and reporting). Current state of water bodies for each attribute.
Bands and minimum states for each attribute (in relation to relevant values or uses). Sets national bottom lines for compulsory values.	Science-informed value judgment	Scientific advice on risk of significant environmental change (including ecological tipping points) and international practice on risk-based thresholds. NOF Reference Group advice on the level at which national bottom lines should be set.	Existing numeric objectives in regional plans. Current state of water bodies compared to potential national bottom lines. Total economic impact of setting national bottom lines at different levels.
The measurement approach for each attribute and how precautionary this is (eg 95 th percentile or median) ¹ .	Science-informed value judgment	Scientific advice on the impacts of different choices on the provision of the value (eg on ecological or human health). NOF Reference Group views on how precautionary national bottom lines should be.	Existing measurement approaches used by councils. Current state of water bodies compared to potential national bottom lines using different types of measurement approaches. Total economic impact of setting national bottom lines at different levels using different types of measurement approaches.

23. Our view is that the areas that are most likely to be controversial during public consultation are:

- a. Which values are compulsory for all water bodies. In particular, should the Forum's recommendation about adding a nationally applied objective to

¹ This relates to how confident you are that the required state is being provided at any point in time. For a median, it may be exceeded 50% of the time; for a 95th percentile it may only be exceeded 5% of the time.

protect human health relate to secondary (eg wading or boating) or primary (eg swimming or kayaking) contact recreation activities.

- b. The level at which national bottom lines are set, including how precautionary the measurement approach is. This includes how much risk to ecological and human health is acceptable, and whether national bottom lines should represent real 'bottom lines' (ie getting close to tipping points or having some level of risk) or a desired goal (eg all water bodies being in good health with very low levels of risk).
24. To try to facilitate a public consultation that involves good debate rather than controversy, Ministers could decide to consult on a limited number of options for national bottom lines rather than going out with a single preferred level for them.
 25. During public consultation there could be some scientific debate about what attributes are included in a NOF and the way in which minimum states have been determined – this will vary by attribute. Our recommendation is that initial population of a NOF include only attributes and minimum states where:
 - a. there has been scientific consensus through the expert, iwi and review panels
 - b. the scientific input has been accepted by the NOF Reference Group.
 26. There could also be criticism that too few values, attributes, minimum states and water body types are included in the initial version of a NOF. Consultation material will need to be clear that further iterations will be released, and that these will add missing values, attributes, minimum states and water body types. Having a simpler initial framework will also give people time to get used to working within it.
 27. As you requested we will provide a draft NOF (including gaps) and additional information to support Ministerial discussions at a presentation in early July 2013. We are working with your offices to set up a time for this.

Timeframe for implementing a NOF and national bottom lines

28. Proposals in *Freshwater Reform – 2013 and beyond* indicated that a regulated NOF and national bottom lines would be in place by the end of 2013. Following public feedback on these proposals, you have indicated that you intend to seek Cabinet agreement to progress these reforms as regulation. Achieving the timeframe outlined in *Freshwater Reform – 2013 and beyond* would require Cabinet to agree to NPS-FM amendment proposals for consultation in late July. Our advice is that this may be too early for Cabinet to make well-informed decisions as:
 - a. The preliminary results from the Waikato economic impacts study will not be available until early to mid August 2013. This is due to our reliance on information from Dairy NZ that cannot be delivered in time to enable earlier completion of economic impacts analysis.
 - b. Some members of the NOF Reference Group have signalled that they would like more time to consider and debate scientific input before finalising their advice to officials. There is considerable ownership of the NOF and national bottom lines by the NOF Reference Group and they are keen to ensure robust testing of possible proposals to amend the NPS-FM ahead of public consultation. If this buy-in and ownership is maintained they may be able to act as champions of the proposals during engagement with their sectors.
29. Based on when results from the Waikato economic impacts study are due, our recommended timeframe for progressing amendments to the NPS-FM is outlined below. Although this timeframe may not allow the results of the Waikato study to be incorporated into material provided to Cabinet, or publically released during consultation, we will be able to present the results to Ministers before Cabinet decisions are sought.

Timeframe	Activities
Early July 2013	Presentation to Ministers on a draft NOF (including gaps).
Mid August 2013	Presentation to Ministers on the preliminary results of the Waikato economic impacts study.
Late August 2013	<p>Cabinet decisions sought</p> <p>Agree to consult on proposals for:</p> <ul style="list-style-type: none"> • the values that communities must manage for (compulsory values) and those that they may consider managing for (optional values) • the values to be initially populated • the associated attributes and minimum states for values to be initially populated, including national bottom lines for ecosystem health and human health • an exceptions regime including the criteria for each of the different types of exception • requirements to account for all water takes and sources of contaminants • existing matters to be clarified. <p>Approve to release for consultation:</p> <ul style="list-style-type: none"> • draft amendment to the NPS-FM • section 32 analysis • discussion paper • supporting technical reports, including scientific papers and economic impacts studies.
Early September to mid October 2013	<p>Public consultation on detailed proposals to amend the NPS-FM to include a NOF. Public consultation would include focused workshops on:</p> <ul style="list-style-type: none"> • the practical use of a NOF in planning • the science behind the population of a NOF.
<p>WITHHELD UNDER SECTION 9(2)(F)(4)</p>	
2016 (tentative) – to coincide with scheduled NPS-FM review	Release of additions to NOF – population of further values and attributes
2019 (tentative)	Release of further additions to NOF – population of further values and attributes

30. Appendix 3 provides a visual overview of the timetable for progressing amendments to the NPS-FM.

Risks and Mitigations

31. WITH HELD UNDER SECTION 9(2)(F)(IV)
- Extending consultation on amendments on the NPS-FM to six weeks (rather than the four weeks envisaged in the original timeframe), with the majority of formal workshops occurring early on, should assist groups that may have capacity issues. An alternative option would be to delay public consultation to later in 2013.
- WITH HELD UNDER SECTION 9(2)(F)(IV)] some councils may not be formally constituted until very late in 2013 which could result in limited engagement from councillors. Delaying public consultation until early 2014 would mean that the amended NPS-FM could not be in force until mid-2014.

- 32.

with held under section
9(2)(g)(i)
of the OIA

33. Potential areas of debate related to the population of a NOF and the setting of national bottom lines are outlined above. Although there are areas of science which could be a matter of debate, our view is that the majority of public debate will be around the values-based judgments, including the level that national bottom lines are set at. The process being used to populate a NOF is designed to provide robust testing of the science within the freshwater science community and by regional councils, iwi and other sectors through the NOF Reference Group.
34. Feedback received following public engagement on *Freshwater Reform 2013 and beyond* indicated strong support for a NOF and national bottom lines, though people are eager to see the detail. There could be criticism if the public do not see that a NOF is being progressed quickly in line with the timeframe proposed in *Freshwater Reform 2013*. This risk can be mitigated through including clear reference to continued work on a NOF and national bottom lines in the planned announcements on collaborative planning for water in July.

Financial, Regulatory and Legislative Implications

35. Implementation of a NOF and national bottom lines involves regulatory change to the NPS-FM that is expected to increase the efficiency of freshwater objective setting by regional councils. Advice on impacts will be provided when decisions are sought to release detailed regulatory proposals (in mid-September 2013).

Consultation

36. Feedback on the timeframe for implementation proposed in *Freshwater Reform 2013 and beyond* was received from some members of the NOF Reference Group. They

suggested delaying the release of detailed regulatory proposals to allow more time for the NOF Reference Group to debate and test the proposals. This has been reflected in our advice above on a revised implementation timeframe, though may not allow as much additional time as those members would have liked.

Next steps

37. We recommend that your office confirms dates for presentations to Ministers in early July to discuss how a NOF could work and mid August to discuss results of the Waikato economic impacts study.

Recommended Action

We recommend that you:

- a) **Note** the National Policy Statement for Freshwater Management (NPS-FM) amendments proposed for progression in 2013 would establish a National Objectives Framework (NOF) and national bottom lines, require accounting of water takes and sources of contaminants, establish transitional provisions and clarify some existing matters.
- b) **Note** that the process being used for development of detailed regulatory proposals for a NOF and national bottom lines includes engagement with a wide range of freshwater scientists, iwi, regional councils and other sectors.
- c) **Note** that public debate on detailed regulatory proposals is likely to focus on the more values-based judgments within a NOF, including the level at which national bottom lines are set.
- d) **Note** that the scientific input is difficult to separate from the values-based judgments and that early release of the science is likely to result in public debate about the level national bottom lines are set without sufficient context, including information on the impacts of different choices.
- e) **Agree** that the timeframe for implementation is delayed so that Cabinet agreement to release proposals for consultation is sought in late August 2013.

Yes / No

- f) **Note** that delaying the timeframe for implementation would mean that amendments to the NPS-FM would be in force in late March 2014.
- g) **Note** that the risks associated with this timeframe include:
 - a. **WITHHELD UNDER SECTION 9(2)(F)(IV)**
 - b. limited time for the NOF Reference Group to test and debate proposals reducing their ownership of, and buy-in to, proposals
 - c. public criticism if a NOF and national bottom lines are not seen to be progressed in line with timeframes in *Freshwater Reform 2013 and beyond*.

Alastair Small
Acting Director, Water Reform

Date

Hon Amy Adams
Minister for the Environment

Date

Hon Nathan Guy
Minister for Primary Industries

Date

Minister's feedback on quality of briefing note:	1	2	3	4	5
1 = Was not satisfactory	2 = Fell short of my expectations in some respects			3 = Met my expectations	
4 = Met and sometimes exceeded my expectations		5 = Greatly exceeded my expectations			

Appendix 1: Participants in scientific engagement process

Panel/expertise	Name	Organisation
Science Review panel	Clive Howard-Williams	NIWA
	Ton Snelder	Aqualinc
	David Hamilton	University of Waikato
	Graham Sevicke-Jones	Greater Wellington Regional Council
	Adrian Meredith	Environment Canterbury
	Bev Clarkson	Landcare Research
	Chris Daughney	GNS
	Jane Kitson	Te Aomarama
	Hannah Rainforth	Ngāti Rangi Trust
	Jon Harding	University of Canterbury
	John Zeldis	NIWA
Iwi Science panel	Hannah Rainforth	Ngāti Rangi Trust
	Gail Tipa	Gail Tipa & Associates
	Erica Williams	NIWA
	Ian Kusabs	Ian Kusabs & Associates
	Garth Harmsworth	Landcare Research
	Jane Kitson	Te Aomarama
	Julian Williams	Waikato-Tainui Claims and Environment Unit
	Maui Hudson	Te Kotahi Research Institute
	Shaun Awatere	Landcare Research
	Terina Rakena	Waikato-Tainui Claims and Environment Unit
	Roku Mihinui	Te Arawa Lakes Trust
Fish expert group	John Hayes	Cawthron Institute
	Corina Jordan	Fish & Game NZ
	Don Jellyman	NIWA
	Paul Franklin	NIWA
	Hannah Rainforth	Kahui Maunga
	Bruno David	Waikato Regional Council
	Alton Perrie	Greater Wellington Regional Council
	Marc Griffiths	MPI
	Ken Hughey	Lincoln University
	Dave West	DOC
Estuaries expert group	John Zeldis	NIWA
	Leigh Stevens	Wriggle Consulting
	Ton Snelder	Aqualinc

Panel/expertise	Name	Organisation
	Joanne Ellis	Cawthron Institute
	Anna Madarasz-Smith	Hawkes Bay Regional Council
	Karen Wilson	Environment Southland
	Malcolm Green	NIWA
Cyanobacteria expert group	Suzie Wood	Cawthron Institute
	David Hamilton	Waikato University
	Wendy Williamson	ESR
	Karl Safi	NIWA
	Juliet Milne	Greater Wellington Regional Council
Periphyton and invertebrates expert group	John Quinn	NIWA
	Ton Snelder	Aqualinc
	Kevin Collier	Waikato Regional Council
	Barry Biggs	NIWA
	Summer Greenfield	Greater Wellington Regional Council
	Martin Neale	Auckland Council
	Ned Norton	NIWA
	Rich McDowell	AgResearch
Water quantity (flows and levels) expert group	Murray Hicks	NIWA
	Doug Booker	NIWA
	Thomas Wilding	Hawkes Bay regional Council
	Mike Thompson	Greater Wellington Regional Council
	Ton Snelder	Aqualinc
	Dave West	DOC
	Barry Biggs	NIWA
Groundwater expert group	Murray Close	ESR
	Chris Daughney	GNS
	Clare Houlbrooke	Golder Associates
	John Bright	Aqualinc
	Karen Wilson	Environment Southland
Sediment expert group	Joanne Clapcott	Cawthron Institute
	Roger Young	Cawthron Institute
	Chris Hickey	NIWA
	Christoph Matthaei	Otago University
	Kevin Collier	Waikato Regional Council
	Summer Greenfield	Greater Wellington Regional Council
Microbial contamination expertise	Graham McBride	NIWA
Toxicity expertise	Chris Hickey	NIWA

Panel/expertise	Name	Organisation
Lakes panel	Marc Schallenberg	University of Otago
	Piet Verburg	NIWA
	Dave Kelly	Cawthron Institute
	Keith Hamill	Opus
	Bill Vant	Waikato Regional Council
Diurnal water quality	Chris Hickey	NIWA
	Bob Wilcock	NIWA
	Rob Davies Colley	NIWA
	Paul Franklin	NIWA

Appendix 2: Members of NOF Reference Group

Member	Organisation	Stakeholder Group
Ken Taylor (chair)	Environment Canterbury	
Iain Maxwell	Hawke's Bay Regional Council	Regional councils
Jon Roygard	Horizons Regional Council	Regional councils
Ken Swinney	Environment Southland	Regional councils
Hannah Rainforth	Kahui Maunga	Iwi Advisers
Clive Howard-Williams	NIWA	Science
Neil Deans	Fish and Game NZ	NGOs
Hugh Canard	Whitewater NZ	NGOs
Stephen Colson	Mighty River Power	Generators
Mike Scarsbrook	Dairy NZ	Primary industries
Ian MacKenzie	Federated Farmers	Primary industries
Chris Keenan	Horticulture NZ	Primary industries
Bernie Napp	Straterra (Mining)	Primary industries
Brenda Baillie	Scion Research (Forestry)	Primary industries

Appendix 3: Overview of timetable for amending the NPS-FM

Indicative timeline for NPS-FM changes and establishment of a National Objectives Framework

	Briefings and decision points	Other events / work-in-progress
Jun 2013	20 Jun: Briefing on progressing a National Objectives Framework (NOF)	Jun - Jul: Science reference groups work to reach consensus on initial NOF content and values
Jul 2013	03 Jul: Briefing First draft/Outline of the NOF (attributes, bottom lines, impacts and information gaps)	14 Jun: Iwi Wananga
	17 Jul: Briefing and decisions on an exceptions regime, transitional provisions and other policy matters	Mid Jun - mid Jul: Final policy analysis on an exceptions regime and transitional provisions
Aug 2013	29 Jul: Draft package of docs and cab paper for direction	Jul - Aug: Drafting of NPS-FM changes, discussion documents and section 32 analysis
	08 Aug: Lodge for OEGl	
Sept 2013	12 Aug: OEGl	02 Sept - mid-Oct: Public consultation on changes to the NPS-FM (including the NOF)
	21 Aug: EGI ;	
Oct 2013	26 Aug: Cabinet : Approval to release the discussion document and undertake consultation	Jun - mid Aug: Waikato region economic impact analysis study
	02 Sept Discussion document launch events (if required)	
Nov 2013		Oct - late-Nov: Analysis of submissions and refinement / changes to proposals in response.
	19 Nov: Briefing summarising consultation feedback and decisions on any changes	
Dec 2013	10 Dec: Ministerial direction on Cab paper drafting	
	CHRISTMAS	
Jan 2014		
Feb 2014		
Mar 2014		
Apr 2014		

WITH HELD UNDER SECTION 9(2)(F)(iv)