

From: Harry Mowbray
To: [Healthy Rivers](#)
Subject: Submission
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I am traveling at the moment and have not been able to download the form or make it so that I can fill it in on line.

Please accept these additional thoughts and I will complete the necessary forms when I get back to my office.

Regards Harry Mowbray
Hartwood Farms

WRC's Proposed Plan Change 1 is a disincentive to environmental investment and innovation.

Regulation that 'maintains' emissions based on grand parenting creates winners and losers. The absurd thing about the present proposal is that those who have done the least to manage their environmental impacts are rewarded the most.

The 'grand parenting' approach to pollution management is perverse in that it penalises mostly those having the least impact on water quality. It incentivises property owners and or mortgage holders to engage in activities that maintain rather than reduce adverse offsite effects. It therefore encourages land management incompatible with the purpose of progressively improving catchment water quality.

Grand parenting of pollution rights results in the revaluation of land in direct proportion to the right to pollute. Those who have reduced their impact on the environment or whose choice of land use is not associated with excessive environmental impacts have faced significant devaluation in property value as a result of PC1. This has in turn curtailed resale value, asset liquidity and mortgage valuation.

This is because productive rural land is valued on the basis of its 'opportunity value'. The implications of a low "Nitrogen Reference Point" (NRP) in terms of land use flexibility and therefore opportunity value are apparent to registered valuers and the banking industry and potential purchasers of a property.

My business partner wished to sell his share in our farm last year and the real estate agent mentioned on multiple occasions that the low NRP was stopping people even wanting to look at the farm. There is no knowing the change in land value as a result of the Proposed Plan but there is little doubt it is significant.

As an organic farmer I see no account is taken of the effects of the diversity of plants and the varying depth of the roots structures within a pasture. Each plant has its own symbiotic bacteria and fungi which absorb nutrient thus further reduce leachate. This diversity and increased depth of biology absorb water soluble nutrient such as cow's urine thus further reducing the leachate from a properly managed organic farm.

None of this is taken account of in Minder the programme used to manage and determine levels of leachate

Further to this organic farmers restrict the use of water soluble plant available artificial fertiliser. The fertiliser has to be made plant available through the biological activity. This process makes nutrient plant available without leaching.

Further to this organics farming has to restrict the stocking rates as organic based food supplements are in short supply and when they are available they are expensive. Essentially an organic farm has to be run less aggressively than a farm using multiple imported supplements. This means the offsite environmental effects on water quality is low thus making the corresponding NRP low.

If authorities are going to continue making rulings that unfairly impact the very best environmental operators, the ETS did exactly the same thing along with people that protected areas of native bush, why would anyone have the confidence to change their land to a lower level of polluting.

Becoming a certified organic farm involves significant personal cost and it is a high risk business to maintain that status, you are just adding another reason for not becoming the very best environmental operator.

As an organic dairy farmer and I assume other low-impact land users will feel the same, I consider it just and reasonable that the burden of nitrate and other adverse discharge reduction is imposed on those operations that are the primary polluters.

Regards Harry Mowbray
Hartwood Farms