

Our ref: SSD-9418-Mod-3

Mrs Jacqueline Blomberg
Environmental Manager
Bettergrow Pty Ltd
2 Wella Way
Somersby NSW 2250

1 July 2026

Subject: Request for Additional Information

Dear Mrs Blomberg

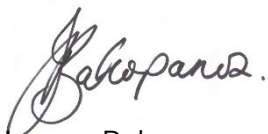
I refer to the Department of Planning, Housing and Infrastructure's (the Department) letter on 26 May 2026, which advised that the Department would be providing comments following the exhibition of the Modification Report for the proposed Modification 3 of Ravensworth Composting Facility Expansion (SSD-9418-Mod-3).

As part of your Submissions Report addressing submissions and advice received during exhibition of your application, the Department requests you provide a response to the issues included in **Attachment 1** to this letter.

At the time of writing, the Department has not received a response from Singleton Council. Any response received from Singleton Council will be provided upon receipt.

If you have any questions, please contact David Ansen on (02) 8289 6721 or via email at David.Ansen@dphi.nsw.gov.au

Yours sincerely



Joanna Bakopanos

**A/ Director
Industry Assessments**

Attachment 1

Waste Management

- Provide detailed justification that the site is suitable to accommodate the proposed 25% increase in throughput, with consideration of the range of potential processing times and the maximum storage capacity for incoming waste and finished product.
- Clarify the sources of FOGO material proposed to be received.
- Clarify the maximum quantity of FOGO material to be stockpiled at the site prior to processing.
- Show on plans where the inspection/stockpile areas for FOGO material are proposed.
- Detail the composting process(es) for FOGO material. Consider including process flow diagrams.
- Detail the decontamination processes that would be in place either on-site or off-site to ensure the suitability of FOGO waste received from municipal collection or from mixed commercial and industrial sources for composting, noting that the existing site process is to return contaminated loads to the supplier.

Air Quality and Odour

- The Modification Report and Air Quality Impact Assessment have characterised only occupied residential receivers as sensitive receivers. The *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* defines sensitive receptors as a location where people are likely to work or reside. Under this definition, several sensitive receivers would fall within or very near to the 2-odour unit contour provided with odour modelling, including the commercial premises at 6496 New England Highway Ravensworth, Ravensworth Operations' coal mine, Chain of Ponds Inn historic site, Singleton MX Track, Ravensworth coal washery and several railway loading and unloading facilities. The assessment should consider impacts on these and any other potential sensitive receivers.
- Historical odour sampling from the leachate dam prior to receipt of putrescible wastes may not be representative of the leachate odour profile relevant to proposed waste storage and processing and its adequacy for use in the Air Quality Impact Assessment should be reconsidered.
- The cumulative odour assessment for the modification must be updated to reflect Loop Organics Pty Ltd's proposed processing rate increase at its 74 Lemington Road outdoor composting facility to 95,000 tonnes per annum.
- Noting the significant potential for odour generation from both outdoor processing and storage of FOGO and the increased processing rate, include details of all reasonable and feasible mitigation measures to minimise odour generation and demonstrate that adopted measures are adequate to manage odour impacts from the site.

Water

- The table of Mitigation and Management measures in Appendix B of the Modification Report retains a previous commitment to line the leachate dams with recompacted overburden/clay. Confirm whether this measure is in place and detail its adequacy for preventing exfiltration of leachate or contaminants, and whether additional lining may be required to account for increased throughput and altered contaminant loadings that will result from end-to-end FOGO processing.
- The Surface Water Impact Assessment made recommendations that have not been addressed in the modification, including a review of the existing surface water monitoring regime in respect to contaminants of potential concern in leachate and a review of the effectiveness of clean water diversion infrastructure. Provide detail on how these recommendations will be addressed.
- The Surface Water Impact Assessment noted a commitment from the Applicant to upgrade clean water diversion infrastructure. Provide detail on the status and outcomes of this upgrade.