



Our ref: DOC26/553355-5

21 October 2026

David Ansen
Planning Officer
Department of Planning, Housing and Infrastructure

Via: NSW Major Projects Planning portal

**EPA Advice on Assessment
Mod 3 Ravensworth Composting Facility – SSD-9418-Mod-3**

Dear David,

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to provide comment on the additional information for the proposed Modification 3 to Ravensworth Composting Facility project at 74 Lemington Road, Ravensworth, New South Wales (Premises).

The EPA has reviewed the following documents:

- *Response to EPA comments* - Element Environment - 24 September 2026
- *Further Response to Submissions* - Todoroski Air Sciences – 24 September 2026

The EPA understands the proposal is for:

- A 50,000 tonne per annum increase in the processing capacity of the premises from 200,000 tonnes per annum to 250,000 tonnes per annum,
- Receiving and processing raw FOGO recovered material at the premises,
- Installation of a weighbridge at the premises and up to 5 additional light vehicles and 14 additional heavy vehicles to access the premises per day.

Bettergrow Pty Ltd currently holds environment protection licence (EPL) No. 7654 issued under the *Protection of the Environment Operations Act 1997* (POEO Act) for the scheduled activity of Composting to be carried on at the Premises.

The EPA considers the matters raised in its previous advice to the Department of Planning, Housing and Infrastructure (DPHI) dated 17 August 2026 (DOC26/428295-3) have generally been addressed

Following the EPA's review of the application and the supporting documentation, the EPA provides the following comments and recommendations:

Matters to be addressed with conditions

The revised AQIA provides additional modelling addressing the EPA previous comments, including cumulative impacts. The EPA notes the additional modelling does not predict odour concentrations above 2 odour units (assessment criterion) at residential sensitive receptors at Camberwell.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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Despite this, the proposal is considered to have residual risk of odour impacts, noting environmental impacts associated with external handling, processing and storage of raw food organics and garden organics (FOGO), which is proposed at the premises.

The EPA recommends that proposals consider best environmental practice measures, including enclosing areas associated with handling, processing and storage of raw FOGO, to avoid generating unnecessary environmental impacts, particularly odour impacts on receivers.

Where alternate measures are proposed, the Proponent should demonstrate that performance comparable with best environmental practice measures is achieved and identify appropriate mitigation and management measures. This should also include consideration of available contingency measures (such as enclosures) that can be retroactively implemented to address odour issues and complaints, and commitment to their implementation where necessary. DPHI may also wish to have regard to the draft *NSW Organics Processing Facility Guidelines*, which have recently been on public exhibition.

Based on the information provided, the EPA recommends DPHI consider the matters in **Attachment A** to address residual risks for environmental impacts, should any draft conditions be prepared for the proposal.

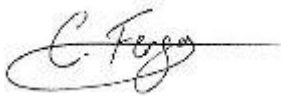
Matters for consideration - Licensing

The EPA notes that, if the proposal is approved the Applicant will need to apply to vary the Licence to allow the change of waste and resource recovery material that is approved to be received at the premises. During this process, conditions on the Licence will be reviewed to ensure that appropriate environmental controls are enforced and that they are consistent with the proposal and development approval.

The EPA is available to be consulted further on this proposal, should DPHI wish to seek further comment in response to any additional information addressing the above matters or in preparing any draft conditions for the project.

If you have any questions about this matter, please contact Carolyn Alford via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely



CARLOS FERGUSON
A/Unit Head – Industry Assessments
Environment Protection Authority

Encl: Attachment A – EPA Recommended Conditions

Attachment A – EPA Recommended Conditions
Mod 3 Ravensworth Composting Facility – SSD-9418-Mod-3

The EPA has reviewed the additional information provided by the Applicant. The EPA notes the proposal includes external FOGO handling, processing and storage, which is not generally considered to represent best environmental practice.

Should the proposal demonstrate it has considered appropriate mitigation and management measures and can achieve performance comparable to best environmental practice measures, the EPA recommends that DPHI consider the following conditions as part of their determination of the application.

Matters to be addressed with conditions

1. The proponent must not receive or process more than 250,000 tonnes of waste in any 12-month period at the Premises.
2. The proponent must not receive or process more than 105,000 tonnes of FOGO waste in any 12-month period at the Premises.
3. The Premises must be designed, constructed, operated and maintained in a manner that does not preclude the retrofit of additional odour emission controls and management measures.
4. The proponent must prepare and implement an Odour Management Plan (OMP). The OMP must include:
 - a) objectives and targets of the OMP;
 - b) an air quality risk assessment;
 - c) key performance indicators;
 - d) identification of all sources of odour associated with the premises;
 - e) proactive and reactive mitigation measures for all significant, and potentially significant emission sources;
 - f) details of the maintenance and management procedures to ensure odour impacts are effectively managed;
 - g) benchmarking of the plant design and management practices at the premises against industry best practice for minimising odour emissions;
 - h) a detailed description of the methods used for monitoring the effectiveness of the odour mitigation methods and management practices for all sources of odour associated with the operation;
 - i) The location(s), frequency, and duration of monitoring;
 - j) a communications strategy for handling potential odour complaints that includes recording, investigating, reporting and actioning complaints;
 - k) system and performance review for continuous improvement; and
 - l) compliance reporting

The EPA advise that as part of preparing the OMP the proposal may consider management measures such as those below, which have been implemented in similar facilities:

- Use of geofabric covers with Category 3 food organics material, and
- Covering Category 3 food organics material at the end of each operational day until the material is stabilised.

Matters for consideration - Licencing

The EPA advises that where external handling, processing and storage areas are proposed, consideration will be given to proof of performance, post-commissioning and on-going monitoring to ensure that implemented controls achieve suitable performance as part of the EPL.

The EPA also advises that should the project be approved, as part a variation to the EPL the EPA will consider requirements for installation of an on-site meteorological station and undertaking of an Odour Audit after commencement of full operations to ensure the proposal is achieving performance consistent with the revised AQIA.