24 September 2026

Attention: David Ansen
Planning Officer – Industry Assessments

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta
NSW 2124

PO Box 1563
Warriewood
NSW 2102

ABN 45 162
835 083

Dear David

Response to EPA comments on State significant modification application SSD-9418-Mod-3 Submissions Report

This letter provides Bettergrow Pty Ltd's (Bettergrow) response to the New South Wales (NSW) Environment Protection Authority (EPA) comments dated 17 August 2026 on the Submissions Report for their State Significant Development modification application SSD-9418-Mod-3 for the Ravensworth Composting facility (the 'facility') at 74 Lemington Road, Ravensworth, NSW (the 'site'). The scope of the proposed modification is hereafter referred to as 'the project'.

The results of additional odour modelling completed to inform this response are presented in Appendix A.

A response has been provided for each issue raised in the EPA comments.

Air

Issue raised:

1. Adopted odour emission rates are unclear

The source odour emission rate (SOER) of 1.8 OUV/m²/s adopted for raw FOGO recovered material represents the average of the odour sampling results presented in the Odour Report (i.e. the data which the AQIA used for site-specific odour values). The Submissions Report states that for large sites that have material present at all stages, and are far away from receivers, any potential odour observed at a receiver will be relatively homogeneous and consistent with the average odour of the material on the site. However, the EPA notes that the issue raised is related to total odour emissions from the facility and ensuring that a reasonable worst-case scenario is modelled as part of the proposal.

The Submissions Report identifies a consistent trend of decreasing odour emissions as the composting material matures. However, per the Odour Report, duplicate samples of the material which had undergone a complete pasteurisation phase (~4 weeks pasteurisation) returned a SOER of ~4 OUV/m²/s. The EPA notes that this figure is significantly higher than the adopted value for raw FOGO recovered material of 1.8 OUVm²/s, despite the assertion that raw FOGO has the highest odour potential of the process. Figure 5-6 indicates a maximum SOER for FOGO recovered material of ~7.4 OUV/m²/s which is substantially higher than the adopted value of 1.8 OUV/m²/s. The EPA notes that if this higher figure is applied proportionally to the proposal, the average SOER for composted material will also increase. Despite the statements in the Submissions

Report noting that composting waste odours may be well mixed by the time odours are received by sensitive receptors, a high SOER at the source contributes to the odour received off-site. The EPA advises that the SOER for raw FOGO be updated to a figure consistent with a reasonable worst-case scenario to ensure that the impacts are well understood and appropriately managed.

Recommendation:

The EPA recommends that DPHI requests the Applicant amend the assessment to ensure that the adopted Source Odour Emission Rate (SOER) for Food Organics and Garden Organics (i.e. at week 0) is representative of a reasonable worst-case scenario for odour.

Response:

As outlined in Section 6.2.3 of the Modification Report, odour emission rates for the project have been estimated using a combination of site-specific odour monitoring previously carried out at the facility, odour monitoring conducted for the project, and monitoring data from other windrow composting operations.

As shown in Figure 5-6 of the *Air Quality Impact and Greenhouse Gas Assessment, Bettergrow Ravensworth Composting Facility, Modification 3* (AQIA) (Todoroski Air Sciences, 2025a), the maximum SOER of approximately 7.4 odour unit volume per square metre per second (OUV/m²/s) measured at another windrow composting operation is an outlier, and is not representative of the broader range of measurements recorded at the source facility, or the conditions expected at the Ravensworth facility. While the maximum measured value may represent the worst case scenario for the specific site and conditions under which it was recorded, it does not account for the remaining measurements or the distribution of the data within the dataset.

The average SOER of approximately 4 OUV/m^2/s was recorded after 4 weeks of in-tunnel pasteurisation of Food Organics and Garden Organics (FOGO) recovered material. As discussed in Section 6.2.3 of the *Ravensworth Composting Facility State significant development Modification 3 Modification Report* (Modification Report) (Element Environment, 2025), FOGO recovered material removed from in-tunnel pasteurisation within 24 hours exhibits the highest odour concentration, exceeding that of raw FOGO recovered material. It is also relevant that the raw FOGO recovered material received at the facility would not have undergone pasteurisation.

Accordingly, neither the maximum SOER of 7.4 OUV/m^2/s not the average SOER of approximately 4 OUV/m^2/s provides an appropriate basis for defining a reasonable worst case operating scenario for the project.

A reasonable worst case scenario should represent a conservatively high, but nevertheless credible and reasonably foreseeable, operating scenario. It should not be based on a maximum individual measurement where that measurement is not representative of the material as a whole, or the site specific circumstances. There is no evidence to indicate that the maximum SOER of 7.4 OUV/m²/s would occur, or that it would be sustained over the spatial and temporal scale represented in the dispersion model, or that it would arise per the current management practices.

As discussed in Section 6.2.3 of the Modification Report, site-representative odour sampling was undertaken to characterise the odour emissions associated with the materials and processes proposed at the facility. The results demonstrate variability between individual samples, as would be expected for heterogeneous organic materials, but importantly provide a site-representative dataset from which a reasonable emission rate can be established. The adopted SOER of 1.8 OUV/m²/s for the raw FOGO recovered material derived from the average of the site-specific measurements is representative of the material expected to be handled at the facility.

Further worst case assessment was not previously considered necessary for the project, as the predicted odour concentrations are well below the EPA criteria, and it was evident that even

substantially higher odour emission rates, beyond those considered reasonably plausible, would not result in any discernible impacts.

Nevertheless, for the purpose of addressing the EPA recommendation and sensitivity testing in the following responses, the odour modelling has been revised to include the maximum SOER of 7.4 OUV/m²/s for the FOGO material received at the facility.

Issue raised:

2. **Odorous activities associated with FOGO composting do not appear to have been considered in the AQIA**

The Submissions Report has stated that operational activities such as such as shredding, blending and windrow turning are short term transient activities that occur intermittently during normal daytime operations. On this basis, the Submissions Report concludes that modelling these activities is unwarranted and would not materially affect the outcomes of the odour assessment.

However, the EPA advises that odour is perceived over very short time periods, and activities such as shredding, blending and windrow turning have the potential to generate significant short-term peaks in odour emissions. A study performed by Todoroski & Cowan showed that emissions were approximately 3.8 times higher in samples immediately following windrow turning compared to samples measured 3+ hours later. Accordingly, the EPA considers the request to model odorous activities such as shredding, blending and windrow turning to be reasonable, to ensure that potential odour impacts from the proposal are well understood and appropriately managed.

Regarding the additional piles located to the north of the composting, processing and blending area, the Submissions Report states that these piles comprise of temporary storage of finished product material. However, the area of these piles appears to be significant i.e. >20,000 m^2 and it is unclear if the size of this area is set to increase under the proposal. While the material is described as finished product, the EPA considers that the storage area may still represent a potentially significant odour source due to its large surface area. Where material has not fully matured, residual odour emissions may still occur and could contribute to cumulative odour impacts at sensitive receptors. The EPA notes that given the scale of the storage area, even relatively low source odour emission rates may result in a material contribution to total site odour emissions. The EPA advises that the potential odour contribution from the northern storage piles should be appropriately considered within the odour impact assessment or supported by sufficient justification where the source is excluded.

Regarding the leachate dams, The EPA previously advised that the SOER for leachate dams must reflect the proposed volume and type of feedstock to be received at the facility. The Submissions Report suggests that the modelled leachate pond emission rate provides a reasonable worst-case, therefore the EPA notes that this should be demonstrated with measured results under a post-commissioning plan.

The Submissions Report has included some information to describe how odour emissions will be managed and mitigated under non-ideal conditions, including;

- **odour monitoring will be undertaken as required should an issue be identified at a sensitive receiver,**
- **turning material to assist moisture loss and aeration or mixing wetter material with drier material to improve a moisture balance, and**
- **a compost management plan that includes procedures for managing temperature, moisture content and carbon-to-nitrogen ratio.**

The EPA advises that the applicant has addressed the issue regarding how odour emissions will be managed under a range of operating scenarios, however, further information is required regarding potential odour sources from the proposal.

Recommendation:

The EPA recommends that DPHI requests the Applicant amend the assessment to ensure that all potential odour sources are considered as part of the odour dispersion modelling, as described below:

a) **Odour source identification - the assessment must be revised to include the following odour sources, or appropriate justification for their exclusion:**
   i. **Shredding and blending activities,**
   ii. **Windrow turning activities, and**
   iii. **Additional areas must be considered (i.e. piles located to the north of the composting, processing and blending area).**

Response:

Section 3.1.1 of the *Ravensworth Composting Facility State significant development Modification 3 Submissions Report* (Submissions Report) (Element Environment, 2026) notes that shredding, blending and windrow turning activities at the facility can result in short term increases in odour emissions as the material is disturbed and additional surface area is temporarily exposed to air. These activities are undertaken intermittently during daytime operating hours, when atmospheric dispersion conditions are generally more favourable than during the evening and overnight periods. Furthermore, as these activities would affect only a relatively small proportion of the site at any one time, they were not initially considered likely to materially affect the predicted off-site odour impacts. Given that the predicted odour concentrations are also well below the relevant EPA criteria, it was considered that emissions associated with these transient activities were unlikely to materially alter the overall conclusions of the assessment. However, in response to the EPA recommendation, shredding, blending and window turning activities have been included in the revised dispersion modelling for the project.

An odour emission rate of 5,741 odour units per second (OU/s) was adopted for shredding activities and an odour emission rate of 4,960 OU/s was adopted for blending activities, based on emission data from comparable sources (Todoroski Air Sciences, 2015; Todoroski Air Sciences, 2021). Emissions from the shredding and blending activities were modelled to occur during the operating hours of the site, from 6.00 am to 6.00 pm.

The air quality assessment undertaken by Todoroski and Cowan in 2015 referenced by the EPA considered windrows that were turned infrequently, with turning occurring only on days 28 and 42. Accordingly, these windrows are expected to contain a greater proportion of localised anerobic and potentially more odorous material than the windrows at the facility, which are typically turned on a weekly basis. In the revised modelling, the potential effects of windrow turning have therefore been conservatively represented based on the emission trends reported in the 2015 Todoroski and Cowan assessment.

The area to the north of the facility's blending and composting area is used intermittently for the occasional temporary storage of finished product prior to its use in mine rehabilitation. This finished AGL compost product complies with 'The Bettergrow Compost Exemption 2025', has very low odour potential, and is suitable to be applied to land as a soil amendment. The quantity of material stored in this area varies over time as finished product is removed and used on a regular basis. Given the mature nature of the material and its low odour potential, this area was not considered to represent a significant odour source in the original assessment. Nonetheless, in response to the EPA recommendation, the northern stockpile area has been included in the revised dispersion modelling.

A maximum SOER of 0.026 OUV/m²/s was adopted for the finished product across the entire northern stockpile area for the entire modelling period, based on odour sampling results for a range of finished product materials from a similar facility (Todoroski Air Sciences, 2025b). This is considered conservative, as the northern area is used for temporary storage only, the quantity of material temporarily stored varies over time, and the entire modelled area would not always be occupied by finished product. The location of the modelled odour emission sources are shown in Figure 1 in Appendix A.

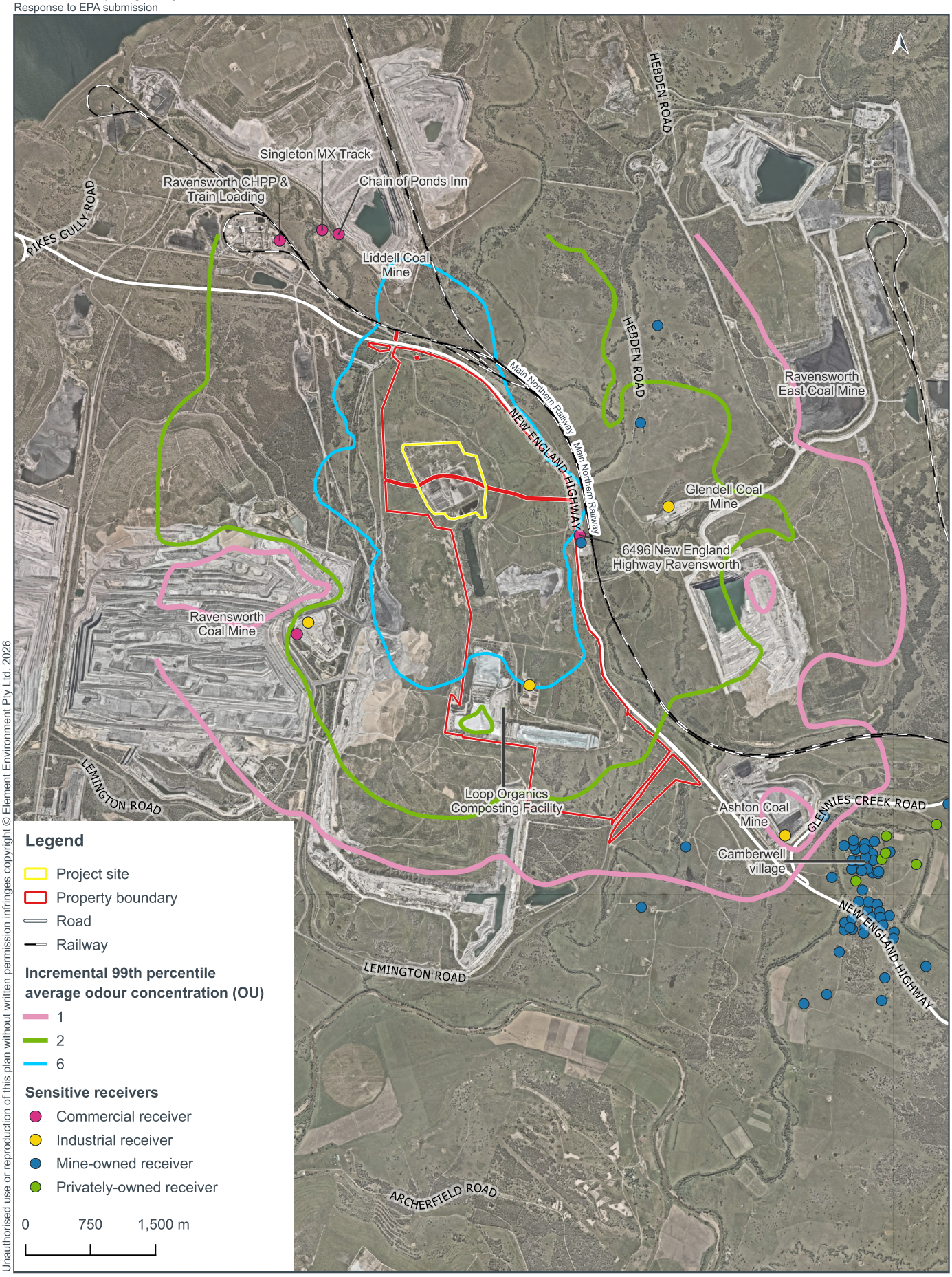
The predicted incremental maximum 99th percentile average odour concentrations for the project, considering odour emissions from shredding, blending and windrow turning activities and the northern stockpile area, are presented in Figure 1. The results indicate that the project would comply with the applicable odour criteria at all sensitive receivers.

The predicted odour concentrations at the privately-owned receivers in Camberwell are below 2 OU, while concentrations at all industrial and commercial receivers are below the applicable 7 OU criterion. The uninhabited warehouse at 6496 New England Highway and the Loop Organics facility are predicted to experience concentrations greater than 2 OU, but remain below 6 OU. Accordingly, no unacceptable odour impacts are predicted at these locations.

Figure 1

Predicted incremental 99th percentile average odour concentration contours (considering additional odour sources)

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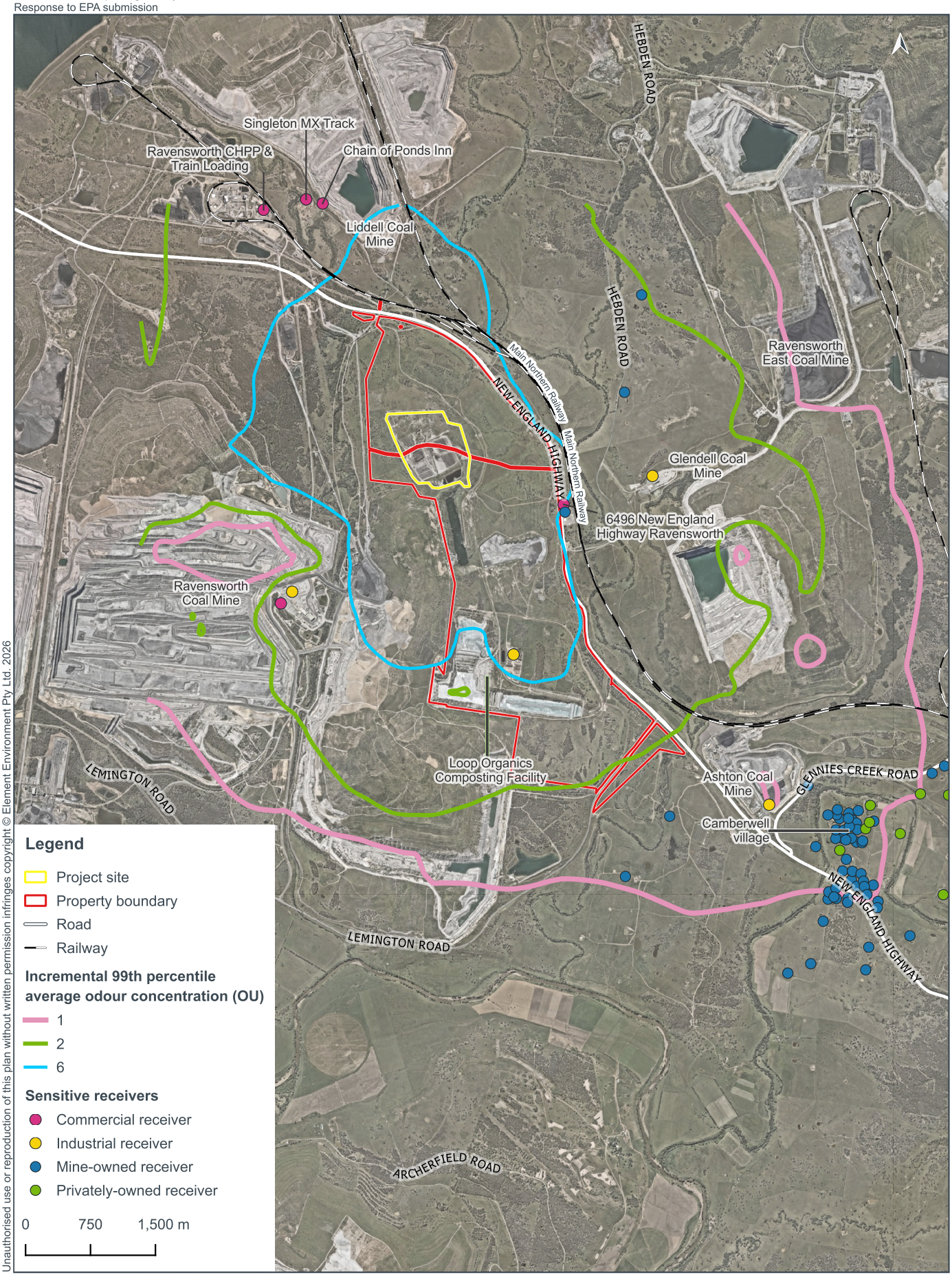
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The predicted incremental maximum 99th percentile average odour concentrations for the project, considering the additional odour source and the maximum SOER of 7.4 OUV/m²/s for the received material, are presented in Figure 2**.** As expected, the conservative assumptions increase the extent of the predicted odour impacts, however the applicable odour criteria continue to be met at all sensitive receivers.

Figure 2

Predicted incremental 99th percentile average odour concentration contours (considering additional odour sources and maximum SOER)

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Issue raised:

3. Additional controls have not been considered in the assessment

The Submissions Report states that it is not considered reasonable or proportionate to require further controls where the predicted odour impacts are already well below the relevant assessment criterion at all sensitive receptors. However, the Submissions Report has suggested that if excessive odour is generated by the project which cannot be adequately managed through standard operational controls set out in the existing management plans, the applicant will temporarily cease the receipt of all material and new composting activities until the cause of the odour issue has been identified and addressed. The EPA notes that although this proposed measure generally appears to be reasonable, it is a reactive measure that is not likely to significantly mitigate odour impacts until after such impacts have occurred. The EPA notes that it is important for the applicant to understand the odour risk of their project as it is their responsibility to comply with Section 129 of the POEO Act to not cause or permit the emission of any offensive odour from the premises to which the licence applies.

The EPA advises that the odour dispersion modelling provided in the AQIA does not appear to resemble reasonable worst-case for cumulative odour, whilst odorous activities associated with FOGO composting have not been considered in the AQIA. The EPA advises that the applicant should rectify these deficiencies as the assessment outcomes may identify the need for further control measures.

Recommendation:

The EPA recommends that DPHI require the Applicant to consider all additional reasonably practicable mitigation measures to reduce the risk of offsite odour impacts from the proposal based on the outcomes of rectifying the issues outlined under Issues 1, 2 and 4.

Response:

The revised odour modelling has addressed the matters raised by the EPA under issues 1, 2 and 4, including the additional odour sources and revised cumulative assessment for an unrealistically high emissions scenario requested by the EPA. Despite this, the results continue to demonstrate compliance with the applicable odour assessment criteria at all assessed receivers.

Accordingly, the revised assessment does not identify any significant risk and hence any other additional odour controls that could be justifiable.

The project already incorporates all reasonable and practicable measures to minimise odour generation, including prompt mixing of odorous material with less odorous material or temporary covering where required, homogeneous mixing, frequent windrow turning, management of compost moisture to avoid anaerobic conditions, management of temperature, moisture and carbon-to-nitrogen ratio, and aeration of the leachate pond. Additional operational responses are also available during non-ideal conditions, including turning material to improve aeration and moisture loss and blending wetter material with drier material.

The site is very well located for this type of activity, with substantial separation from any sensitive receivers. The AQIA identified the nearest sensitive residential receivers at Camberwell as approximately 6 km from the site, which is a very large and significant buffer for odour dissipation.

On this basis, the existing and proposed mitigation measures are considered appropriate and proportionate to the low level of odour risk demonstrated by the conservative modelling.

Any additional measures such as enclosure or end-of-pipe treatment are considered unreasonable and unnecessary where the assessment demonstrates compliance and there is no identified off-site odour impact, even using extreme worst case assumptions.

In the unlikely event that an odour issue arises and cannot be adequately managed through the established operational controls, the contingency measures previously identified would apply, including temporarily ceasing receipt of material and new composting activities while the cause is investigated and addressed.

Issue raised:

4. **The cumulative odour assessment does not appear to be reasonable worst case.**

The cumulative odour assessment does not appear to be reasonable worst case Under the Environment Protection Licence of Loop Organics (EPL 20892), the facility is able to accept General solid waste (putrescible) which includes food waste, as defined under Schedule 1 of the POEO Act. However, the cumulative assessment conducted as part of the proposal has not considered FOGO waste streams, despite Loop Organics having a waste receival capacity of 55,000 tonnes per year.

The AQIA derived a SOER of 0.034 OUV/m²/s using data from the Bettergrow Ravensworth facility prior to that facility accepting FOGO waste streams. The EPA considers that the adopted SOER of 0.034 OUV/m²/s does not appear to be representative of the activities conducted at Loop Organics, nor does it reflect a reasonable worst-case scenario for cumulative odour assessment.

While the applicant notes that there is limited information available regarding the Loop Organics facility, this does not remove the ability to use alternative approaches to estimate cumulative odour impacts. In the absence of site-specific data, the EPA notes that operational data from comparable composting facilities that accept FOGO waste may be appropriate, such as the data from the Odour Report which was used to estimate emissions for the proposal.

Under DA 8.2016.173.8 Loop Organics recently (June 2026) received approval from Singleton Council to increase their facility's processing capacity from 55,000 tonnes per annum to 95,000 tonnes per annum which is likely to further influence cumulative odour in the area. The EPA advises that a cumulative assessment for the proposal should consider a reasonable worst case odour scenario based on the Loop Organics facility's accepted waste streams at 55,000 tonnes per annum.

Recommendation:

The EPA recommends that DPHI request the Applicant revises the cumulative odour assessment to ensure that it is representative of the types of waste which are accepted by Loop Organics (including the receival and composting of FOGO waste).

Response:

As mentioned in Section 3.1.1 of the Submissions Report, the Loop Organics development application was lodged after this modification application, and sufficient information regarding the Loop Organics facility was not available during the preparation of the AQIA. As such, it was not possible for the AQIA to incorporate emissions data from the Loop Organics facility in the cumulative air quality assessment. However, sufficient publicly available information regarding the Bettergrow project was available to enable the Loop Organics facility to consider this project in its cumulative assessment.

At the time the earlier responses to the EPA were prepared, information regarding the material types, process activities, active composting areas, operational practices, emission controls and

associated odour emission rates for the Loop Organics facility were not available. In the absence of this information, adopting alternative assumptions for the facility would have been speculative and would not have provided a reliable basis for the cumulative assessment.

On 2 September 2026, Loop Organics provided odour emission data used in the air quality assessment for its recently approved 95,000 tonnes per annum (tpa) operation (The Odour Unit, 2025). The provided SOER data are summarised in Table 1, and include data specific to the Loop Organics facility together with odour emission data sourced from the consultant's database.

Table 1 Loop Organics supplied odour data

Source	Min SOER (OUV/m^2/s)	Max SOER (OUV/m^2/s)
FOGO (includes receival to finished product)	0.06	6.14
Biomix (includes receival to finished product)	0.17	5.05
Leachate dam		1.32

The updated odour emission data from Loop Organics has been incorporated into the revised cumulative dispersion modelling. Consistent with the approach adopted in the AQIA, emissions have been assigned to the Loop Organics processing and composting areas and the leachate dam. More detailed spatial or temporal representation in the modelling of individual activities was not possible based on the information provided.

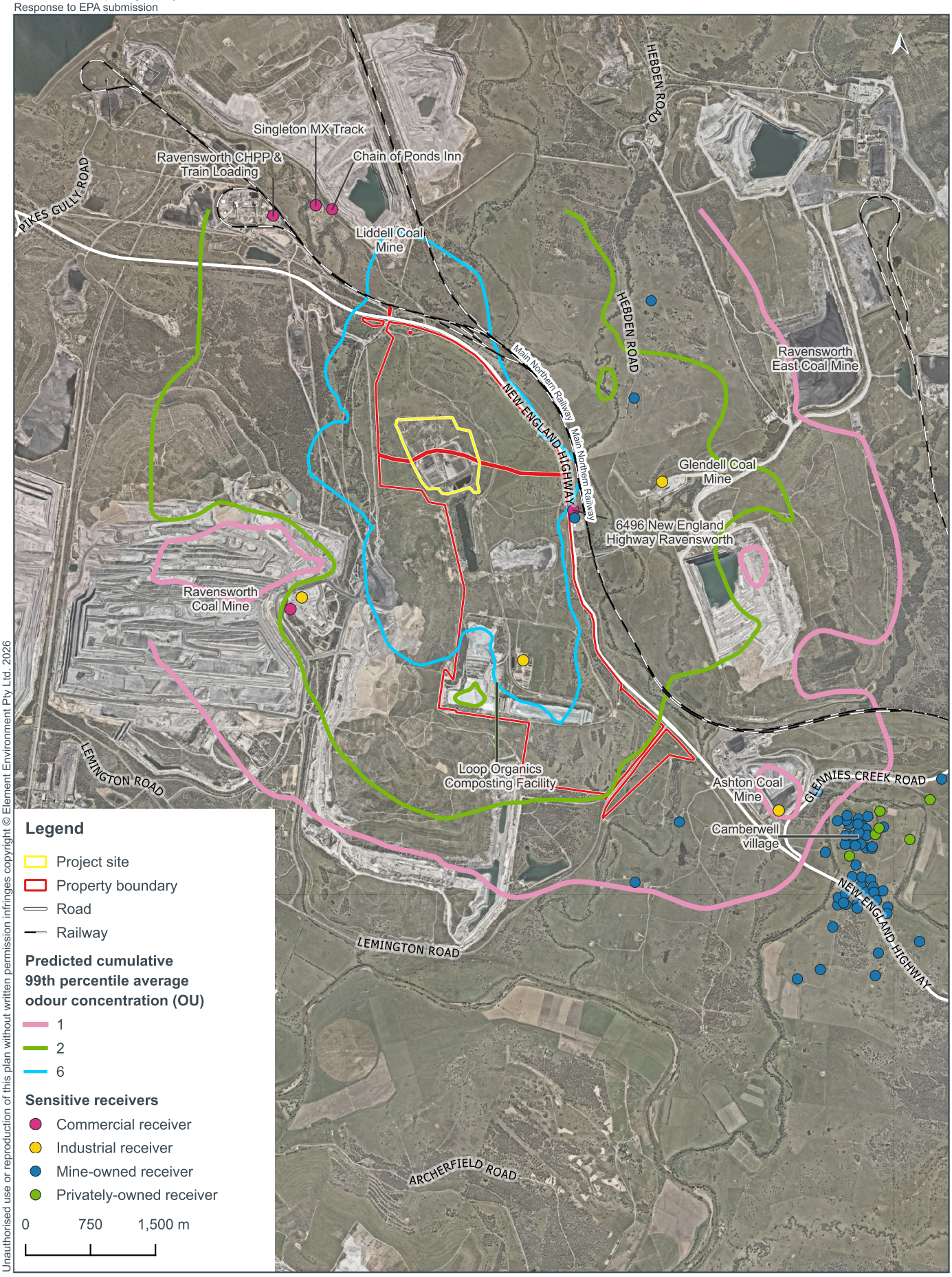
The revised cumulative assessment includes a scenario based on the representative SOERs from the available Loop Organics data, together with an additional sensitivity scenario applying the maximum SOERs. The predicted cumulative maximum 99th percentile average odour concentrations for the project, operating in combination with the Loop Organics composting facility, and taking into consideration the additional odour sources identified in issue 2 above, are presented in Figure 3 and Figure 4. It is noted that the maximum Loop Organics SOER scenario provides a highly conservative assessment of the potential cumulative odour impacts.

The results indicate that the predicted levels at privately-owned residential receivers in Camberwell are below 2 OU. The results also indicate that predicted odour concentrations at all industrial and commercial receivers remain below the applicable 7 OU criterion. The uninhabited warehouse at 6496 New England Highway and the Loop Organics facility are predicted to experience concentrations greater than 2 OU but below 6 OU.

Accordingly, the revised cumulative assessment, including the conservative maximum SOER sensitivity scenario, predicts acceptable odour impacts. It is also relevant to note that workers at commercial receivers would generally only be present during daytime hours, when atmospheric dispersion conditions are typically more favourable. As a result, actual odour impacts at these receivers are expected to be lower than those represented by the contour plots.

Figure 3
Predicted cumulative 99th percentile average odour concentration contours (considering Loop Organics supplied odour data)

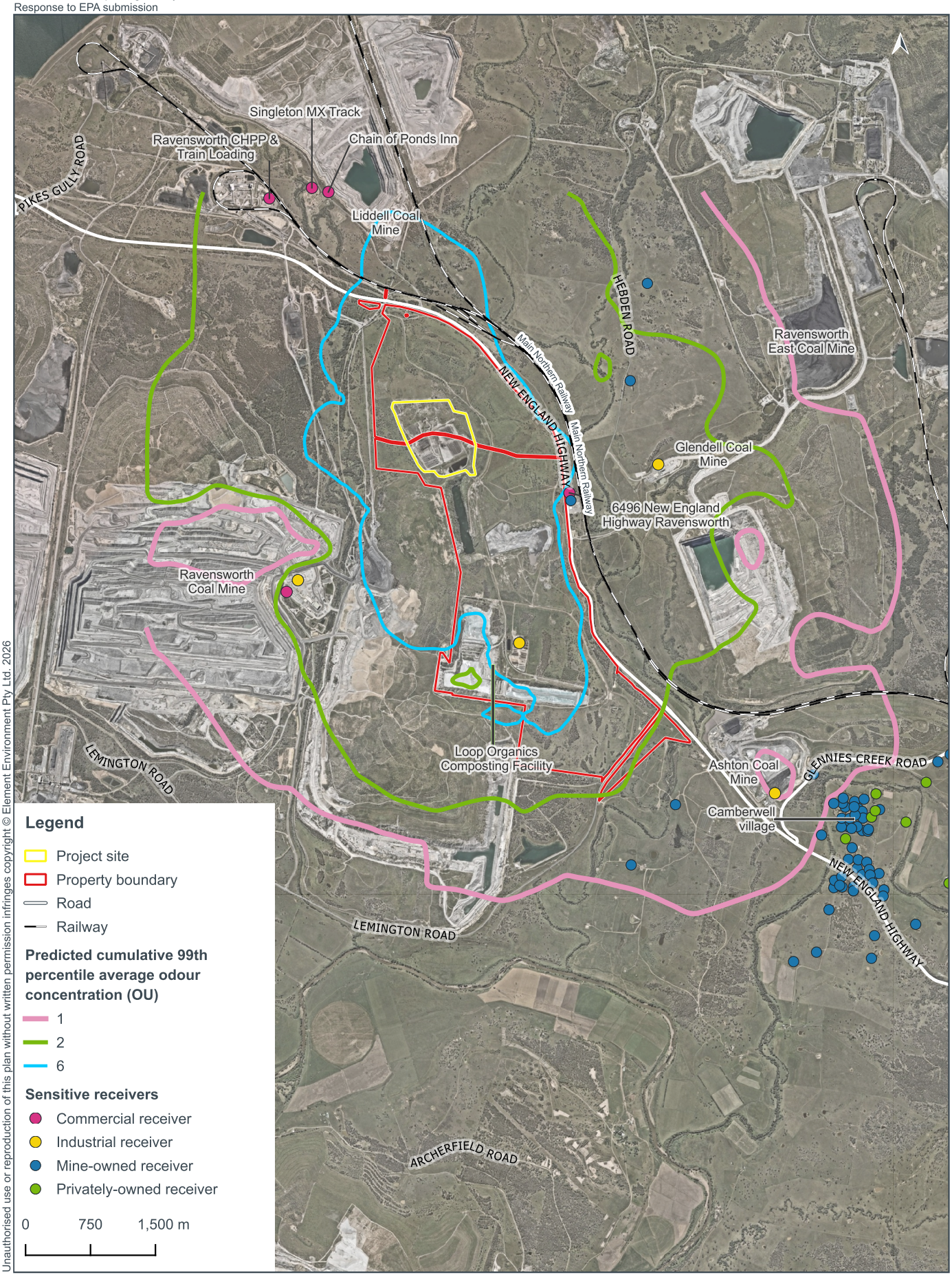
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Figure 4
Predicted cumulative 99th percentile average odour concentration contours (considering Loop Organics supplied worst case odour data)

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Issue raised:

5. **Sensitive receptors do not appear to have been assessed appropriately**

Recommendation:

The EPA finds this adequately addressed.

Response:

The EPA's comment is noted.

Issue raised:

6. **The AQIA does not appeared to have identified engineering contingencies that could be implemented should odour impacts occur under the proposal**

Recommendation:

The EPA finds this adequately addressed.

Response:

The EPA's comment is noted.

Waste and Resource Recovery

Issue raised:

1. **The applicable resource recovery orders and exemptions for raw FOGO recovered materials should be clarified.**

Recommendation:

The EPA finds this adequately addressed.

Response:

The EPA's comment is noted.

Issue raised:

2. **Material quantities in the Modification Report are not consistent with individual waste classification types and don't clearly identify materials that will be composted or materials that will be blended.**

Recommendation:

The EPA finds this adequately addressed.

Response:

The EPA's comment is noted.

Surface Water Management

Issue raised:

1. **Further clarification is required for surface water management controls.**

The EPA notes that in the Submissions Report, Figure 3.3 has been updated to provide more detailed information about surface water and leachate management controls at the site. However, it is noted that the internal roadways, and their detailed interactions with the stormwater and leachate management controls have been removed and not shown on Figure 3.3.

The EPA notes, that the northern stockpile area is still undefined as a potential source zone for contamination risk to surface water at the site. The temporary storage area for finished material is a significant area >20,000 m^2. Figure 3.3 does not have the storage area identified or have mapped surface water controls outlined. Since it is located hydraulically up-gradient of the clean water drainage "stormwater diversion swale," the EPA is concerned it poses an ongoing risk to stormwater contamination if onsite controls are not clearly outlined and mapped.

The EPA notes that whilst the Surface Water Impact Assessment (SWIA) identifies management and mitigation measures for the clean water diversion infrastructure and leachate management systems, the Applicant has stated that there are no new measures proposed to be implemented as part of this modification. The EPA's review of the Submissions Report indicates that that additional clarification on measures, such as more detailed mapped roadways, access points to the composing area, protection of the stormwater diversion swale, northern diversion bunds etc. to reduce the risk of contamination of the clean water should be provided.

Recommendation:

The EPA recommends that DPHI requests the Applicant provide:

- **An updated Site Plan with the earthen bunds of the temporary storage area mapped and detailed to outline the northern area of the site's water management,**
- **Reinstatement of the roadways and culverts around the site on the Site map, and**
- **Clarification and detail how the stormwater diversion swale, roadways and moving plant and equipment on the site will be separated to maintain quality of stormwater runoff.**

Response:

Figure 3.3 of the Submissions Report is a revised version of Figure 1.5 of the Modification Report, as stated in Section 3.1.3 of the Submissions Report. Figure 1.5 of the Modification Report does not specifically indicate internal roadways or detailed interactions with stormwater and leachate management controls on the figure. However, truck access points have been added to Figure 3.3 of the Submissions Report, and a description of the access points and flow of stormwater via culverts underneath the access points is provided in Section 3.1.3 of the Submissions Report.

The updated site layout (refer to Figure 3.3 of the Submissions Report) has been revised and reproduced in Figure 5 below to indicate more clearly internal access roads and access points with culverts, as well as the earth bund around the northern temporary storage area.

A detailed description of stormwater and leachate management controls is provided in sections 3.1.3, 3.1.4 and 4.4 of the Submissions Report, and Section 1.3.5 of the Modification Report.

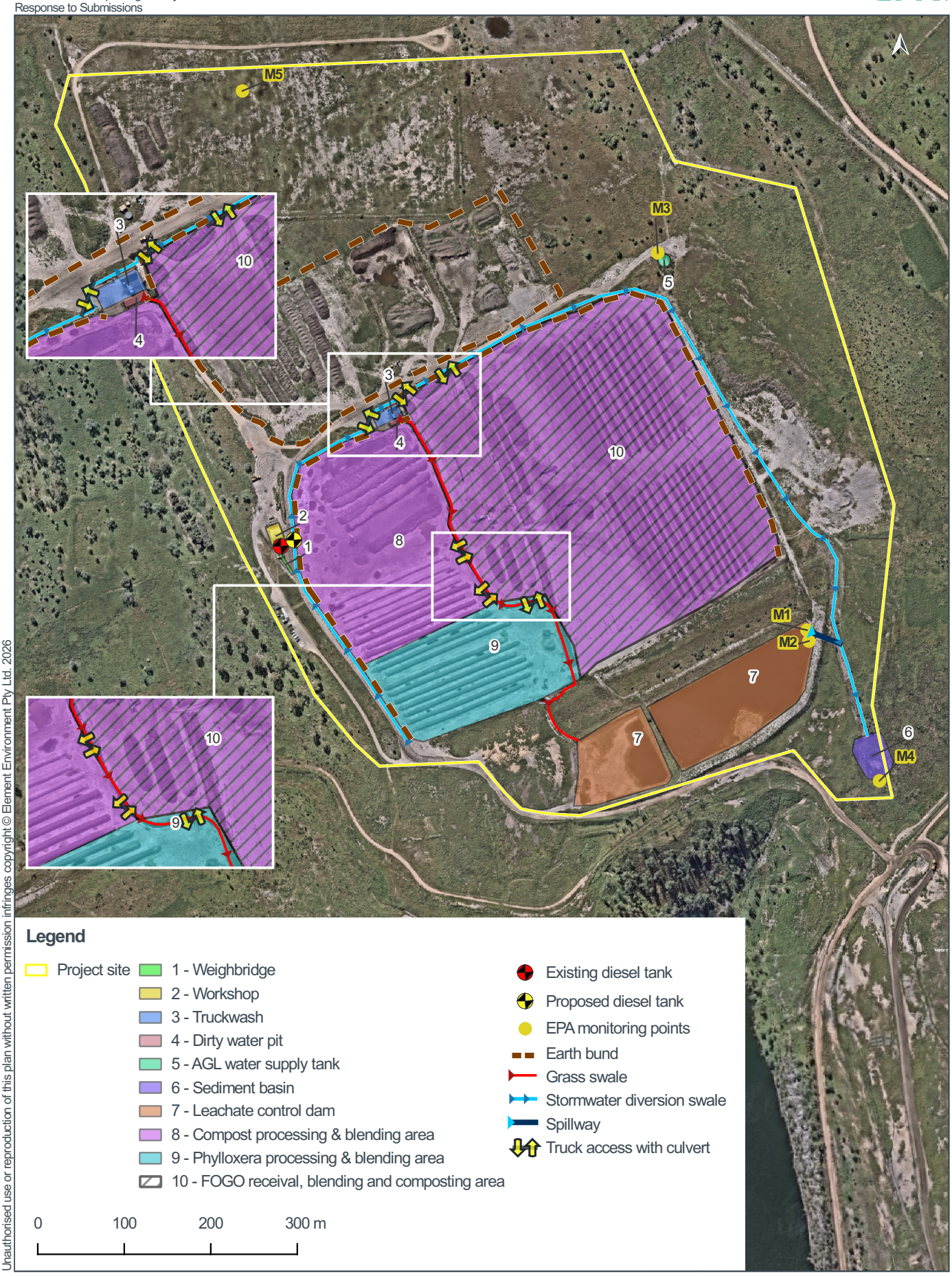
As described in Section 3.1.3 of the Submissions Report and shown in Figure 5, the eastern clean water drainage line is discontinuous in three locations to allow delivery trucks and plant to access the processing pad for operational purposes. The grass swale that conveys wastewater from the truck wash to the leachate dam, is also discontinuous in three locations to enable operational vehicles and plant to travel between the eastern and western processing pads. Culverts have been installed beneath all these access points to maintain flow along the clean water drainage line and grass swale.

The northern area occasionally used for temporary storage of finished AGL compost product awaiting collection is a self-bunded (earthen bund) area, as described in Section 3.1.3 of the Submissions Report. This finished AGL compost product complies with 'The Bettergrow Compost Exemption 2025' and is suitable to be applied to land as a soil amendment.

As stated in Section 3.1.3 of the Submissions Report, rainfall within the northern stockpile area, including during periods of heavy rainfall, is naturally managed through infiltration and evaporation. Rainfall is absorbed by the highly fibrous compost stockpile, with excess water infiltrating the underlying ground or evaporating from the stockpile surface. The northern temporary storage area is lower in elevation than the access roads, and the earthen bund around this area prevents any runoff from flowing onto the access roads and into the stormwater diversion swale. The site is also inspected daily, with appropriate management measures implemented as required. As such, runoff from the northern stockpile area is not likely to flow into the clean water drainage system, or the composting processing pad, as mentioned in Section 3.1.3 of the Submissions Report. As such, the temporary storage of finished product is not considered to present a contamination risk to surface water.

Figure 5
Updated site layout

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Response to Submissions



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Issue raised:

2. Further clarification is required for leachate management controls.

The Submission Report outlines a number of actions that the Applicant currently uses to minimise leachate generation. It is then outlined that the leachate dams are designed to be successive overflow captures via spillways if excessive leachate volumes are collected, with the final spillway directing leachate off the Premises into the former Void 4.

The EPA would like to re-iterate, that this event would be considered, under Section 120 of the POEO Act, to be a pollution of waters incident. The EPA notes that it is important for the Applicant to understand that the management of leachate volumes of their project is their responsibility to comply with Section 120 of the POEO Act to not cause or permit the pollution of waters from the premises to which the licence applies.

Recommendation:

The EPA recommends that DPHI request the Applicant clarify the proposed mitigation and management measures around leachate to prevent the discharge of leachate off the Premises.

Response:

The leachate dam is managed to maintain adequate storage capacity and freeboard, as outlined in the facility's *Operational Environmental Management Plan – Bettergrow Ravensworth Composting Facility* (Bettergrow, 2024).

As described in Section 3.1.4 of the Submissions Report and Section 6.3.3 of the Modification Report, the facility operates a *closed-loop water management system*, whereby leachate captured in the onsite leachate control dam is reused for moisture conditioning during the composting process, as the composting process is a *net user of water*. As such, leachate is contained within the leachate control dam only for a limited time.

The updated site water balance prepared for the project (refer to Section 6.3.3 of the Modification Report) indicates that, under average climate conditions, the facility would *remain a net user of water*. Accordingly, the project would not result in a net increase of leachate generated, as outlined in Section 6.3.4 of the Modification Report.

As indicated in Section 3.1.4 of the Submissions Report and Section 1.3.5 of the Modification Report, the leachate control dam has enough storage capacity (50.2 megalitres (ML)) to capture all runoff up to the 1% (1 in 100-year) Annual Exceedance Probability (AEP) 24-hour rainfall event. In the *exceedingly rare event* that the leachate control dam overflows during rainfall *less frequent* than the 1% AEP 24-hour rainfall event, leachate water can flow via a spillway into the 2 ML lower sediment basin. As such, the potential for uncontrolled discharge of leachate from the sediment basin (i.e. off-site discharge) is considered very low.

Furthermore, the facility operates under an environment protection licence (EPL) (EPL 7654), which regulates the management and discharge of leachate, including through designated licensed discharge points (M2 (Leachate dam emergency spillway) and M4 (Sediment basin), as shown in Figure 5) and associated monitoring requirements. Leachate would be retained within the designated leachate management system and would only be discharged to Void 4 (i.e. off-site) during storm events exceeding the 1% AEP flood event, if required, and in accordance with the applicable EPL conditions.

Kind Regards,



Amna Robinson
Senior Environmental Consultant

0483 210 634
amna@elementenvironment.com.au

References

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Todoroski Air Sciences (2025b), Air Quality Impact and Greenhouse Gas Assessment ANL Tea Gardens, prepared for Wedgetail Project Consulting by Todoroki Air Sciences, November 2025.

Todoroski Air Sciences (2026), Response to Submissions - Bettergrow Ravensworth Composting Facility, Modification 3, prepared by Todoroki Air Sciences, July 2026.

Appendix A: Additional air quality assessment

TODOROSKI AIR SCIENCES
Suite 2B, 14 Glen Street Eastwood, NSW 2122
Phone: 02 9874 2123
Fax: 02 9874 2125
Email: info@airsciences.com.au
Web: www.airsciences.com.au
ACN: 151 202 765 | ABN: 74 955 076 914

24 September 2026

Amna Robinson
Senior Environmental Consultant
Element Environment
Via email: amna@elementenvironment.com.au

RE: Further Response to Submissions – Bettergrow Ravensworth Composting Facility Modification 3

Dear Amna,
The following outlines further additional information and clarification to address requests for information relating to the *Air Quality Impact and Greenhouse Gas Assessment, Bettergrow Ravensworth Composting Facility, Modification 3* (the AQIA) (**Todoroski Air Sciences, 2025a**) and the subsequent *Response to Submissions – Bettergrow Ravensworth Composting Facility Modification 3* (the RTS) (**Todoroski Air Sciences, 2026**).

Submissions addressed include those from the New South Wales (NSW) Environmental Protection Authority (EPA).

Each of the key comments is shown in grey italics and is followed by our response to the comment.

1. Adopted odour emission rates are unclear

The source odour emission rate (SOER) of 1.8 OUV/m²/s adopted for raw FOGO recovered material represents the average of the odour sampling results presented in the Odour Report (i.e. the data which the AQIA used for site-specific odour values). The Submissions Report states that for large sites that have material present at all stages, and are far away from receivers, any potential odour observed at a receiver will be relatively homogeneous and consistent with the average odour of the material on the site. However, the EPA notes that the issue raised is related to total odour emissions from the facility and ensuring that a reasonable worst-case scenario is modelled as part of the proposal.

The Submissions Report identifies a consistent trend of decreasing odour emissions as the composting material matures. However, per the Odour Report, duplicate samples of the material which had undergone a complete pasteurisation phase (~4 weeks pasteurisation) returned a SOER of ~4 OUV/m²/s. The EPA notes that this figure is significantly higher than the adopted value for raw FOGO recovered material of 1.8 OUVm2/s, despite the assertion that raw FOGO has the highest odour potential of the process. Figure 5-6 indicates a maximum SOER for FOGO recovered material of ~7.4 OUV/m²/s which is substantially higher than the adopted value of 1.8 OUV/m²/s. The EPA notes that if this higher figure is applied proportionally to the proposal, the average SOER for composted material will also increase. Despite the statements in the Submissions Report noting that

composting waste odours may be well mixed by the time odours are received by sensitive receptors, a high SOER at the source contributes to the odour received off-site. The EPA advises that the SOER for raw FOGO be updated to a figure consistent with a reasonable worst-case scenario to ensure that the impacts are well understood and appropriately managed.

Recommendation

The EPA recommends that DPHI requests the Applicant amend the assessment to ensure that the adopted Source Odour Emission Rate (SOER) for Food Organics and Garden Organics (i.e. at week 0) is representative of a reasonable worst-case scenario for odour.

The EPA's recommendation is noted. The EPA's suggested approach to develop a reasonable worst-case scenario for odour appears to involve selectively adopting the maximum measured SOER of 7.4 OUV/m^2/s from an unrelated site, considering a value of 4 OUV/m^2/s from in-tunnel pasteurisation (that does not occur here), and disregarding the measured site-representative data from the operator and other factors.

The EPA's statement that a higher site SOER will result in increased odour concentrations at a receptor is technically correct, but it is only relevant where there is evidence that a substantially higher SOER would occur at the project site. No site-specific data currently supports this assumption for the project. The available data indicates that a substantially higher SOER is unlikely, and this should be considered in determining an appropriate emission rate for the assessment.

Site-representative odour sampling was undertaken to characterise the odour emissions associated with the materials and processes proposed at the facility. The results demonstrate variability between individual samples, as would be expected for heterogeneous organic materials, but importantly provide a site-representative dataset from which a reasonable emission rates can be established. The adopted SOER of 1.8 OUV/m^2/s for the raw FOGO derived from the average of the site-specific measurements is representative of the material expected to be handled at the facility.

The EPA refers to the maximum measured SOER of approximately 7.4 OUV/m^2/s from an unrelated site and suggests this a suitable basis to increase the adopted emission rate to represent a reasonable worst-case scenario. As evident in Figure 5-6 of the AQIA, the 7.4 OUV/m^2/s value is an outlier result, and is not representative of the other facility or this facility. Adopting the single highest measured value, while disregarding the remaining measurements and their distribution, may represent the worst case scenario for some part of some other site, but is not a valid basis for any reasonable worst-case operating scenario for the Ravensworth site.

A reasonable worst-case scenario should represent a conservatively high, but nevertheless credible and reasonably foreseeable, operating condition. It should not be based on a maximum individual measurement where that measurement is not representative of the material as a whole, or the site specific circumstances. There is no evidence to indicate that this would occur, or that it would be sustained over the spatial and temporal scale represented in the dispersion model, or would arise per the management practices on the site.

A further worst-case assessment is not considered necessary for the facility because the predicted results are far below the EPA criteria, and even a much higher odour emission rate than is reasonably plausible would not result in any impact.

Nevertheless, for the purpose of addressing the EPA recommendation, we have revised the odour modelling to include the maximum SOER for received material of 7.4 OUV/m^2/s for sensitivity testing in the following response.

2. Odorous activities associated with FOGO composting do not appear to have been considered in the AQIA

The Submissions Report has stated that operational activities such as such as shredding, blending and windrow turning are short term transient activities that occur intermittently during normal daytime operations. On this basis, the Submissions Report concludes that modelling these activities is unwarranted and would not materially affect the outcomes of the odour assessment.

However, the EPA advises that odour is perceived over very short time periods, and activities such as shredding, blending and windrow turning have the potential to generate significant short-term peaks in odour emissions. A study performed by Todoroski & Cowan1showed that emissions were approximately 3.8 times higher in samples immediately following windrow turning compared to samples measured 3+ hours later. Accordingly, the EPA considers the request to model odorous activities such as shredding, blending and windrow turning to be reasonable, to ensure that potential odour impacts from the proposal are well understood and appropriately managed.

Regarding the additional piles located to the north of the composting, processing and blending area, the Submissions Report states that these piles comprise of temporary storage of finished product material. However, the area of these piles appears to be significant i.e. >20,000m2 and it is unclear if the size of this area is set to increase under the proposal. While the material is described as finished product, the EPA considers that the storage area may still represent a potentially significant odour source due to its large surface area. Where material has not fully matured, residual odour emissions may still occur and could contribute to cumulative odour impacts at sensitive receptors. The EPA notes that given the scale of the storage area, even relatively low source odour emission rates may result in a material contribution to total site odour emissions. The EPA advises that the potential odour contribution from the northern storage piles should be appropriately considered within the odour impact assessment or supported by sufficient justification where the source is excluded.

Regarding the leachate dams, The EPA previously advised that the SOER for leachate dams must reflect the proposed volume and type of feedstock to be received at the facility. The Submissions Report suggests that the modelled leachate pond emission rate provides a reasonable worst-case, therefore the EPA notes that this should be demonstrated with measured results under a post commissioning plan.

The Submissions Report has included some information to describe how odour emissions will be managed and mitigated under non-ideal conditions, including;

- *odour monitoring will be undertaken as required should an issue be identified at a sensitive receiver,*
- *turning material to assist moisture loss and aeration or mixing wetter material with drier material to improve a moisture balance, and*
- *a compost management plan that includes procedures for managing temperature, moisture content and carbon-to-nitrogen ratio.*

The EPA advises that the applicant has addressed the issue regarding how odour emissions will be managed under a range of operating scenarios, however, further information is required regarding potential odour sources from the proposal.

Recommendation

The EPA recommends that DPHI requests the Applicant amend the assessment to ensure that all potential odour sources are considered as part of the odour dispersion modelling, as described below:

a) Odour source identification - the assessment must be revised to include the following odour sources, or appropriate justification for their exclusion:

> ***i. Shredding and blending activities,***
>
> ***ii. Windrow turning activities, and***
>
> ***iii. Additional areas must be considered (i.e. piles located to the north of the composting, processing and blending area).***

As noted in the RTS, shredding, blending and windrow turning activities at the facility can result in short-term increases in odour emissions as material is disturbed and additional surface area is temporarily exposed to air. These activities are undertaken intermittently during daytime operating hours, when atmospheric dispersion conditions are generally more favourable than during the evening and overnight periods. On this basis, but also because the material on the site is turned frequently and has low odour in the first place, these transient activities were not originally considered likely to materially affect the predicted off-site odour impacts. This is especially so as only a small part of the site could be affected and the results are so far below criteria that it is not plausible for this to affect the conclusions.

However, we appreciate that this may not be obvious, and in response to the EPA recommendation, all of these potential additional odour sources have been included in the revised dispersion modelling for the Project set out in this letter.

For shredding activities, an odour emission rate of 5,741 OU/s was adopted based on data from similar sources (**Todoroski Air Sciences, 2021**). For blending activities, an odour emission rate of 4,960 OU/s was adopted, also based on data from similar sources (**Todoroski Air Sciences, 2015**). Emissions from the shredding and blending activities were modelled to occur during the operating hours of the site, from 6.00 am to 6.00 pm.

Turning of compost windrows can temporarily increase odour emissions as the material is disturbed and previously enclosed material is exposed. The EPA submission refers to **Todoroski & Cowan (2015)**. For the activities in the 2015 paper, the windrows were not turned frequently (only at days 28 and 42) and would contain pockets of more odorous anerobic material than in this case where windrows are typically turned on a weekly basis. For the revised modelling, the effect of windrow turning has thus been conservatively represented in the modelling per the trends in **Todoroski and Cowan (2015)**.

The stockpile area to the north of the facility's composting, processing and blending area is used intermittently for the temporary storage of finished product prior to its use in mine rehabilitation. The finished material has a very low odour potential, and generally has soil-like odour character. The quantity of material stored in this area varies over time as finished product is removed and used. Given the mature nature of the material and its low odour potential, this area was not considered to represent a significant odour source in the original assessment.

In response to the EPA recommendation, the northern storage area has been included in the revised dispersion modelling. Available odour sampling results for a range of finished product materials from a similar facility were reviewed, with the maximum measured SOER of 0.026 OUV/m^2/s (**Todoroski Air Sciences, 2025b**) adopted across the entire storage area. This emission rate was applied continuously throughout the

modelling period. This is considered conservative as the area is used for temporary storage, the quantity of material present varies over time, and the entire modelled area would not be occupied by finished product at all times

Figure 1 presents the location of the modelled odour emission sources for the Project.



Figure 1: Modelled odour sources for the Project

The spatial distribution of the dispersion modelling predictions for the Project with the additional odour source is shown in **Figure 2**. The results indicate that the Project would comply with the applicable odour criteria at all assessed receptors.

Predicted odour concentrations at the privately-owned receptors in Camberwell are below 2 OU, while concentrations at all industrial and commercial receptors are below the applicable 7 OU criterion. The uninhabited warehouse at 6496 New England Highway and the Loop Organics facility are predicted to experience concentrations greater than 2 OU, but remain below 6 OU. Accordingly, no unacceptable odour impacts are predicted at these locations.

Figure 3 presents the modelling results adopting the maximum SOER for received material, as described in the previous response. As expected, this assumption increases the extent of the predicted odour impacts; but the applicable odour criteria remain satisfied at all assessed receptors.

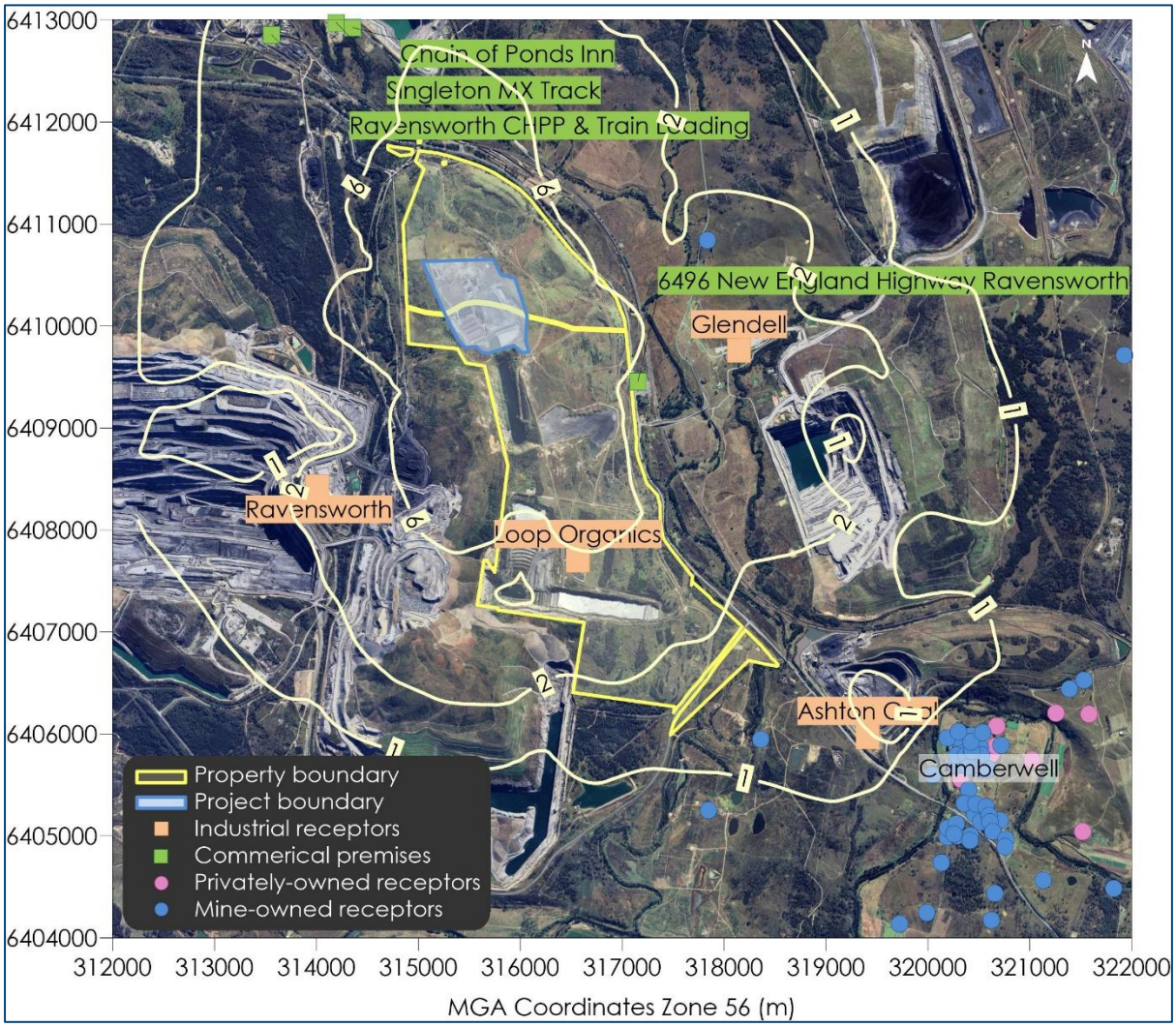


Figure 2: Predicted 99th percentile nose-response average odour concentration – Incremental impact with additional odour sources

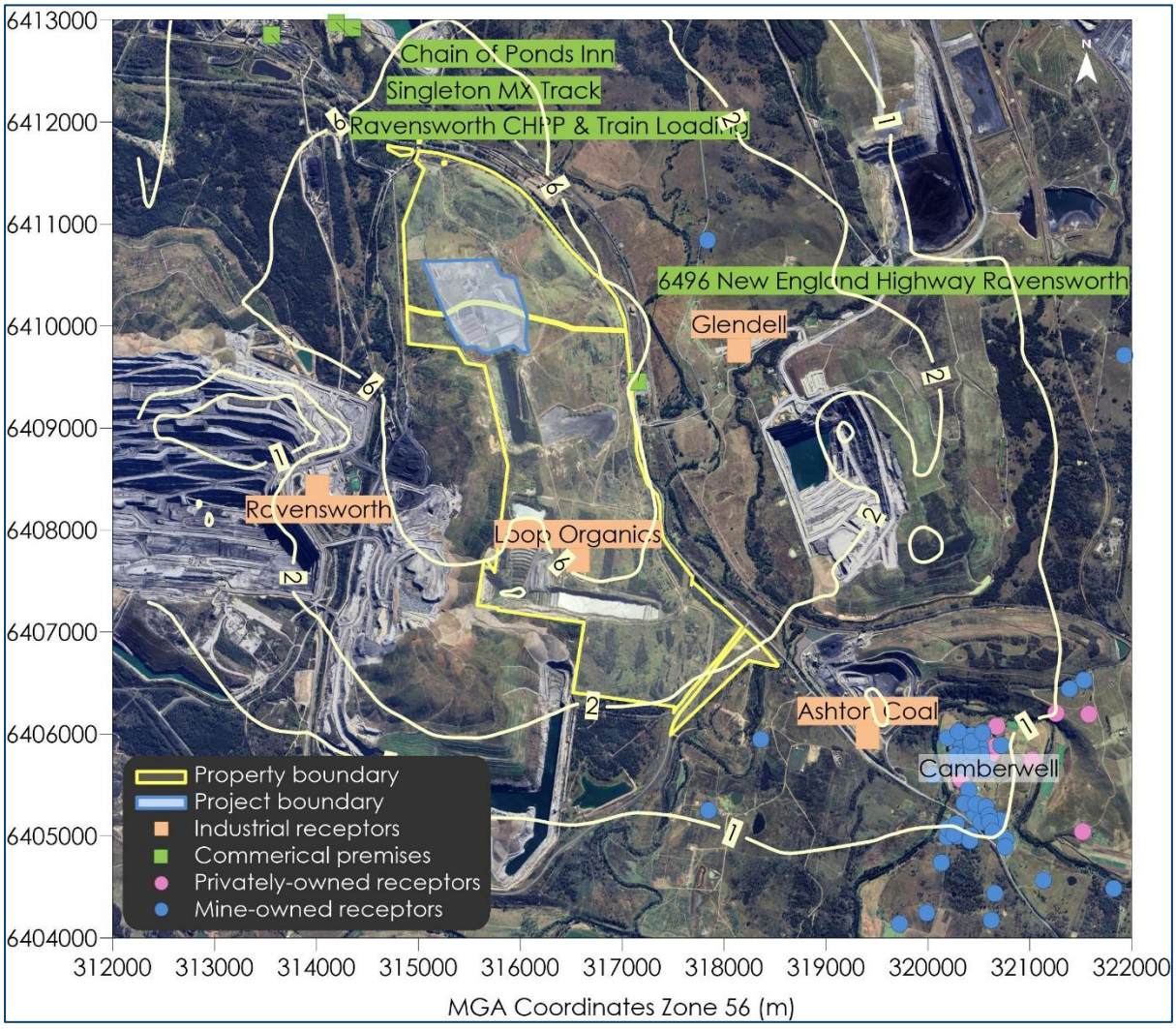


Figure 3: Predicted 99th percentile nose-response average odour concentration – Incremental impact with additional odour sources and maximum SOER for received material

As expected, the revised modelling including a scenario with the additional odour sources and conservative worst-case emission rate assumptions per the EPA recommendations, all demonstrate that the Project would not result in unacceptable odour impacts at any sensitive receptor.

3. Additional controls have not been considered in the assessment

The Submissions Report states that it is not considered reasonable or proportionate to require further controls where the predicted odour impacts are already well below the relevant assessment criterion at all sensitive receptors. However, the Submissions Report has suggested that if excessive odour is generated by the project which cannot be adequately managed through standard operational controls set out in the existing management plans, the applicant will temporarily cease the receipt of all material and new composting activities until the cause of the odour issue has been identified and addressed. The EPA notes that although this proposed measure generally appears to be reasonable, it is a reactive measure that is not likely to significantly mitigate odour impacts until after such impacts have occurred. The EPA notes that it is important for the applicant to understand

the odour risk of their project as it is their responsibility to comply with Section 129 of the POEO Act to not cause or permit the emission of any offensive odour from the premises to which the licence applies.

The EPA advises that the odour dispersion modelling provided in the AQIA does not appear to resemble reasonable worst-case for cumulative odour, whilst odorous activities associated with FOGO composting have not been considered in the AQIA. The EPA advises that the applicant should rectify these deficiencies as the assessment outcomes may identify the need for further control measures.

Recommendation

The EPA recommends that DPHI require the Applicant to consider all additional reasonably practicable mitigation measures to reduce the risk of offsite odour impacts from the proposal based on the outcomes of rectifying the issues outlined under Issues 1, 2 and 4.

The revised odour modelling has addressed the matters raised by the EPA under Issues 1, 2 and 4, including the additional odour sources and revised cumulative assessment for an unrealistically high emissions scenario requested by the EPA. Despite this, the results continue to demonstrate compliance with the applicable odour assessment criteria at all assessed receptors.

Accordingly, the revised assessment does not identify any significant risk and hence any other additional odour controls that could be justifiable.

The Project already incorporates all reasonable and practicable measures to minimise odour generation, including prompt mixing of odorous material with less odorous material or temporary covering where required, homogeneous mixing, frequent windrow turning, management of compost moisture to avoid anaerobic conditions, management of temperature, moisture and carbon-to-nitrogen ratio, and aeration of the leachate pond. Additional operational responses are also available during non-ideal conditions, including turning material to improve aeration and moisture loss and blending wetter material with drier material.

The site is very well located for this type of activity, with substantial separation from any sensitive receptors. The previous assessment identified the nearest sensitive residential receptors at Camberwell as approximately 6 km from the site, which is a very large and significant buffer for odour dissipation.

On this basis, the existing and proposed mitigation measures are considered appropriate and proportionate to the low level of odour risk demonstrated by the modelling.

Any additional measures such as enclosure or end-of-pipe treatment are considered unreasonable and unnecessary where the assessment demonstrates compliance and there is no identified off-site odour impact, even using extreme worst-case assumptions.

In the unlikely event that an odour issue arises and cannot be adequately managed through the established operational controls, the contingency measures previously identified, including temporarily ceasing receipt of material and new composting activities while the cause is investigated and addressed, would apply.

4. The cumulative odour assessment does not appear to be reasonable worst case

Under the Environment Protection Licence of Loop Organics (EPL 20892), the facility is able to accept General solid waste (putrescible) which includes food waste, as defined under Schedule 1 of the POEO Act. However, the

cumulative assessment conducted as part of the proposal has not considered FOGO waste streams, despite Loop Organics having a waste receival capacity of 55,000 tonnes per year.

The AQIA derived a SOER of 0.034 OUV/m^2/s using data from the Bettergrow Ravensworth facility prior to that facility accepting FOGO waste streams. The EPA considers that the adopted SOER of 0.034 OUV/m^2/s does not appear to be representative of the activities conducted at Loop Organics, nor does it reflect a reasonable worst-case scenario for cumulative odour assessment.

While the applicant notes that there is limited information available regarding the Loop Organics facility, this does not remove the ability to use alternative approaches to estimate cumulative odour impacts. In the absence of site-specific data, the EPA notes that operational data from comparable composting facilities that accept FOGO waste may be appropriate, such as the data from the Odour Report which was used to estimate emissions for the proposal.

Under DA 8.2016.173.8 Loop Organics recently (June 2026) received approval from Singleton Council to increase their facility's processing capacity from 55,000 tonnes per annum to 95,000 tonnes per annum which is likely to further influence cumulative odour in the area. The EPA advises that a cumulative assessment for the proposal should consider a reasonable worst case odour scenario based on the Loop Organics facility's accepted waste streams at 55,000 tonnes per annum.

Recommendation

The EPA recommends that DPHI request the Applicant revises the cumulative odour assessment to ensure that it is representative of the types of waste which are accepted by Loop Organics (including the receival and composting of FOGO waste).

The Loop Organics development application was submitted for approval after this modification application, and sufficient information regarding the Loop Organics facility was not available during the preparation of the AQIA. As such, it was not possible for the AQIA to consider the data from the Loop Organics facility development application in the cumulative assessment. However, sufficient publicly available information regarding the Bettergrow project was available to enable the Loop Organics facility to consider this project in its cumulative assessment.

At the time of the earlier responses to the EPA, information regarding the material types, process activities, active composting areas, operational practices, emission controls and associated odour emission rates for the Loop Organics facility were not available. In the absence of this information adopting alternative assumptions for the facility would have been speculative and inherently incorrect.

Loop Organics provided odour emission data used in the odour assessment for its recently approved 95,000 tonnes per annum (tpa) operation on 2 September 2026. The data include information specific to the Loop Organics facility together with odour emission data sourced from the consultant's database. The relevant SOER data provided are summarised in **Table 1**.

Table 1: Odour data from Loop Organics

Source	Min SOER (OUV/m²/s)	Max SOER (OUV/m²/s)
FOGO (includes receival to finished product)	0.06	6.14
Biomix (includes receival to finished product)	0.17	5.05
Leachate dam	-	1.32

These data were applied for modelling the Loop Organics 95,000tpa operation, and encompass the waste streams identified by the EPA in relation to the 55,000tpa cumulative assessment.

The updated information has been incorporated into the revised cumulative dispersion modelling. Consistent with the approach adopted in the AQIA, emissions have been assigned to the Loop Organics processing and composting areas and the leachate dam. More detailed spatial or temporal representation in the modelling of individual activities was not possible based on the information provided.

The revised cumulative assessment includes a scenario based on the representative SOERs from the available Loop Organics data, together with an additional sensitivity scenario applying the maximum SOERs. The maximum SOER scenario provides a highly conservative assessment of the potential cumulative odour impacts.

The cumulative modelling predictions are provided in **Figure 4** and **Figure 5**, showing the results based on the representative Loop Organics emission rates and the maximum SOER sensitivity scenario, respectively.

The results show that for the privately-owned residential receptors in Camberwell, the predicted levels are below 2 OU. The results also indicate that predicted odour concentrations at all industrial and commercial receptors remain below the applicable 7 OU criterion. The uninhabited warehouse at 6496 New England Highway and the Loop Organics facility are predicted to experience concentrations greater than 2 OU but below 6 OU.

Accordingly, the revised cumulative assessment, including the conservative maximum SOER sensitivity scenario, predicts acceptable odour impacts.

It is relevant to note that any workers at the commercial receptors would generally only be present during the daytime, when dispersion is better and impacts would be lower than shown in the contour plots.

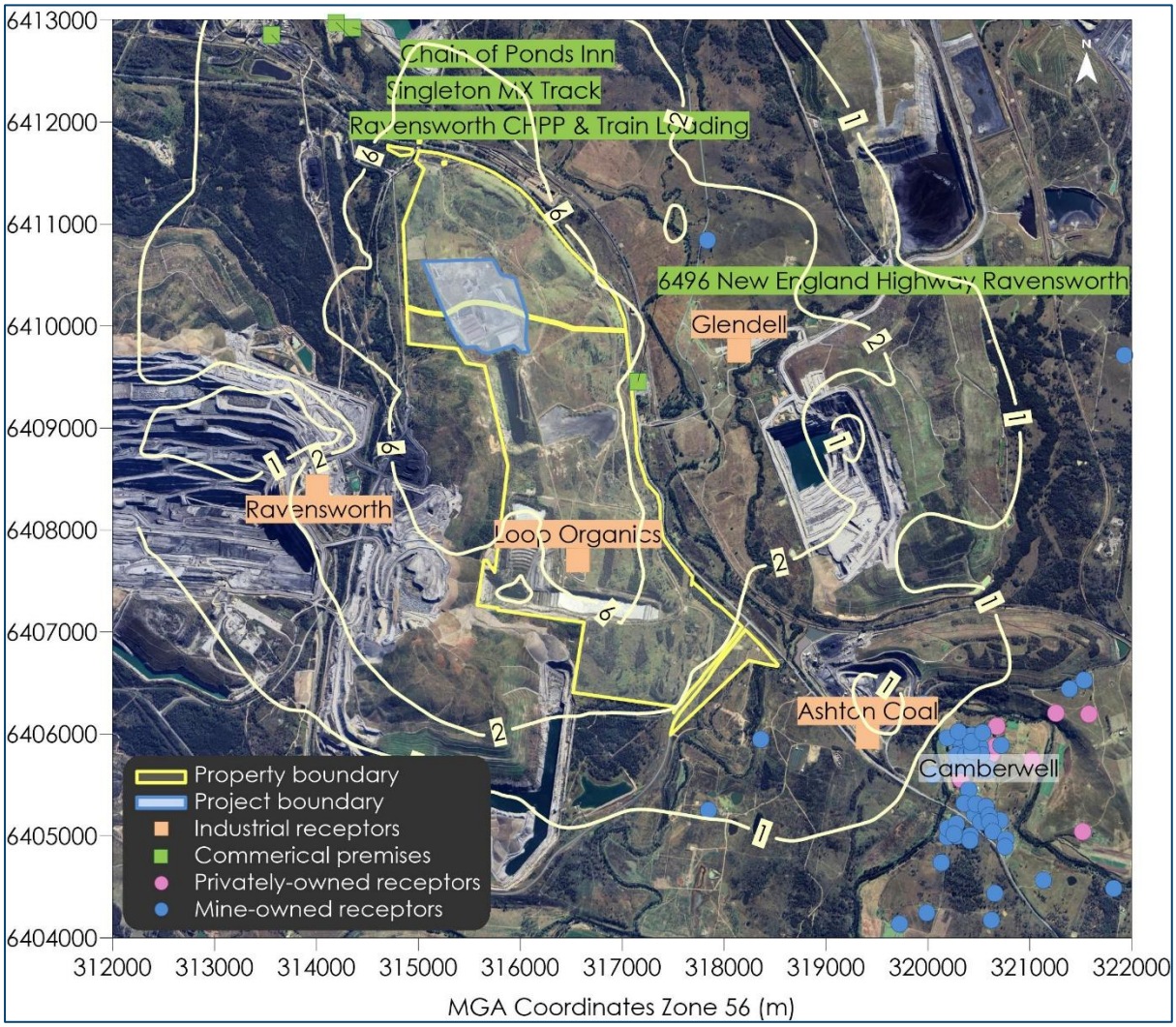


Figure 4: Predicted 99th percentile nose-response average odour concentration – Cumulative impact using Loop Organics supplied odour data

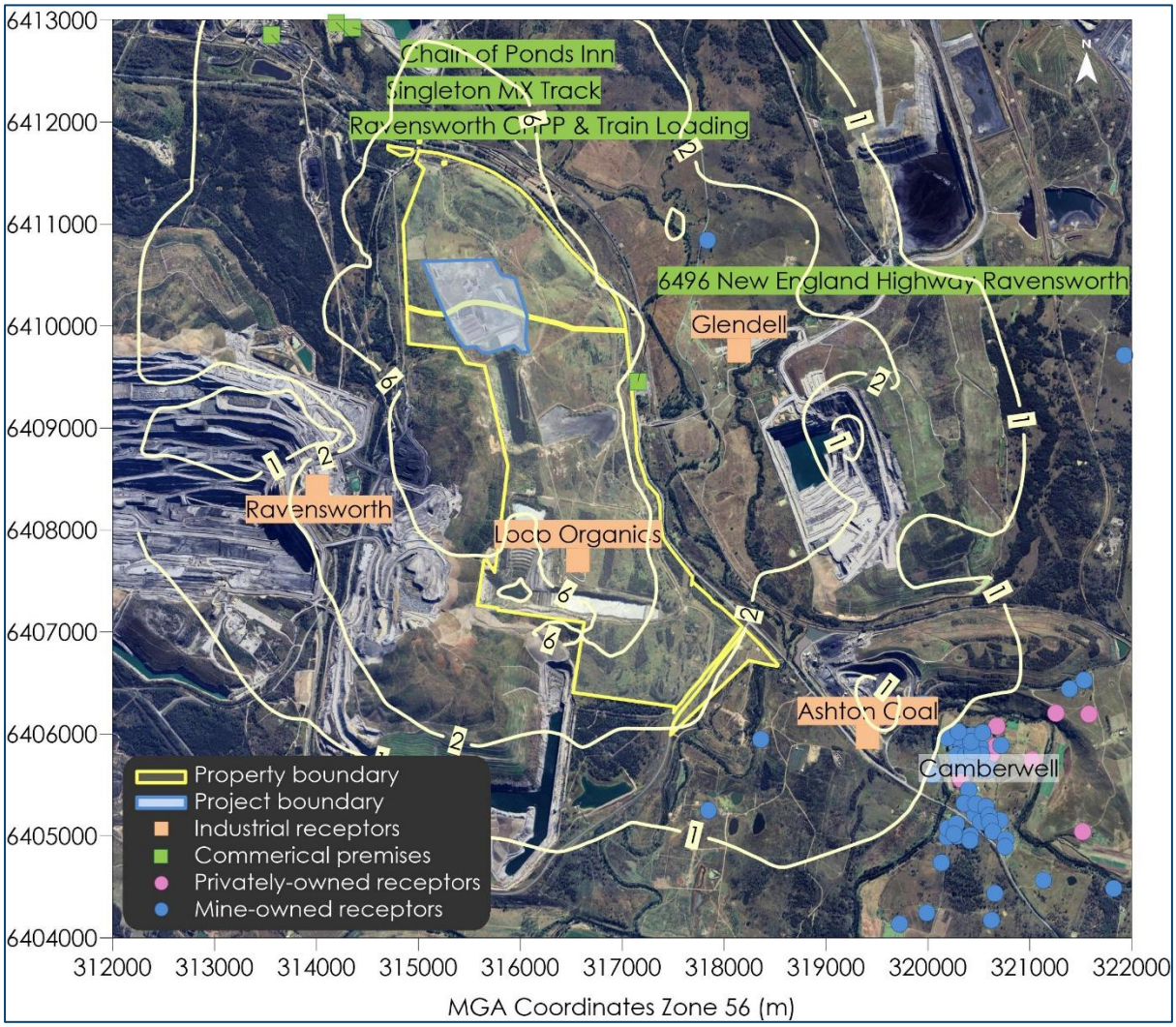


Figure 5: Predicted 99th percentile nose-response average odour concentration – Cumulative impact using Loop Organics supplied worst-case odour data

Modelling per the EPA's recommendations does not alter any conclusions in the original work, and shows the operations would be complaint with the NSW odour impact assessment criteria.

Please feel free to contact us if you would like to clarify any aspect of this report.

Yours faithfully,
Todoroski Air Sciences

Philip Henschke

Aleks Todoroski

References

Todoroski Air Sciences (2015)

"Air Quality Assessment Organic Compost Facility Gerogery, NSW", prepared for Transpacific Cleanaway by Todoroski Air Sciences, January 2015.

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