

25 May 2026

Attention: David Ansen
Planning Officer – Industry Assessments



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Dear David

Response to EPA advice on State significant modification application SSD-9418-Mod-2

This letter provides Bettergrow Pty Ltd's (Bettergrow) response to the New South Wales (NSW) Environment Protection Authority's (EPA's) advice dated 14 May 2026 regarding their State Significant Development modification application SSD-9418-Mod-2 for the Ravensworth Composting facility (the 'facility') at 74 Lemington Road, Ravensworth, NSW (the 'site').

Issue raised:

1. The AQIA has not considered potential options available to control odour

Previous recommendation: The Proponent must investigate and outline additional odour control options that could be applied at the Premises, should odour impacts occur once proposed operations have been implemented

The RtS outlined the current odour management measures implemented at the facility, including the following:

- Moisture management
- Carbon to nitrogen ratio (feedstock blending)
- Aeration and windrow turning
- Temperature monitoring and control
- Management following rainfall events
- Particle size control
- Covering of odorous materials
- Equipment and infrastructure

The RtS has stated that decontaminated and pasteurised FOGO and/or food recovered material would be incorporated into windrows containing biosolids and green waste as soon as practicable, and that where immediate incorporation is not possible, the material would be temporarily covered with green waste until incorporation into a biosolids composting windrow can occur.

The EPA note that the odour management measures implemented and proposed are generally considered operational and reactive type measures. However, additional feasible mitigation measures that could be implemented if the facility emits offensive odour have not been identified.

Per the NSW Technical Framework, it is important that the Proponent consider what options are available to control odour for new and modified activities during the assessment/planning stages of a proposal.

Section 6.2 of the NSW Odour Technical Framework states the proposal must include any additional feasible mitigation measures that could be implemented if the facility emits offensive odour after it is operational.

The Proponent should therefore identify measures beyond the proposed operations which could be implemented should odour impacts continue after plant modifications have taken place.

Recommendation: The EPA recommends that the Proponent identify additional feasible mitigation measures that could be implemented if the facility emits offensive odour after plant modifications have taken place.

Response:

The EPA criteria for acceptable levels of odour range outlined in the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (EPA Approved Methods) (EPA, 2022) range from 2 to 7 odour units (OU), with the more stringent 2 OU threshold applying to densely populated urban areas, and the 7 OU threshold applying to sparsely populated rural areas, as described in Section 6.2.2 of the Modification Report (Modification Report) (Element, 2025).

Dispersion modelling demonstrates that operational odour levels will remain below the most stringent EPA criteria of 2 OU at all residential receivers in Camberwell and surrounding industrial receivers, even under highly conservative assumptions, as discussed in Section 6 of the Air Quality Impact and Greenhouse Gas Assessment (AQIA) (Todoroski, 2025), Section 6.2.5 of the Modification Report and Bettergrow's response to the EPA submission dated 23 April 2026 (RtS).

The AQIA therefore concluded that no further operational air quality mitigation or management measures are required in addition to the existing industry-recognised best practice controls implemented by the facility in accordance with the *Technical framework - Assessment and management of odour from stationary sources in NSW* (Technical Framework) (EPA, 2006) (refer to Section 7 of the AQIA). These best practice operational controls are considered standard proactive industry practice to minimise environmental impacts as far as reasonably practicable to meet the objectives of the Technical Framework. The controls take into account the location of the facility, and have been incorporated into the facility's operational management plans.

Nonetheless, Bettergrow commits to implement additional management measures beyond the current controls to minimise any potential odour emissions, as described in the RtS. This includes incorporating decontaminated and pasteurised Food Organics and Garden Organics (FOGO) and/or food recovered material into a windrow containing biosolids and green waste as soon as practicable following arrival at the site, or temporarily covering the material with green waste until it can be incorporated into a biosolids composting windrow, as described in the RtS. Other odour prevention strategies that may be used at the site include the integration of chemical and/or biological dosing to the windrows, which can optimise microbial activity and minimise the formation of odorants. Combined with the existing operations management measures, Bettergrow believe they have identified all reasonable and feasible mitigation measures to minimise potential odour emissions.

In the unlikely event of offensive odour being emitted by the facility, Bettergrow will investigate and undertake an odour survey in accordance with the *Guide to conducting field odour surveys* (EPA, 2022), to identify the source of the odour and determine appropriate management measures in accordance with the Technical Framework. It is not reasonable for the proponent to

identify every potential scenario that may require additional mitigation measures, particularly as the AQIA predicts that no odour impact would occur under highly conservative assumptions.

Any complaints will be captured in the Bettergrow Complaints Register, as outlined in the *Composting Management Plan, Including Management for CA-05 Biosecure Treatment of Phylloxera Host Plant Material for Recycling* (Bettergrow, 2025) and *Operational Environmental Management Plan* (Bettergrow, 2024).

As such, the facility will implement all reasonable and feasible mitigation and management measures outlined in the Technical Framework to minimise any potential odour impacts during operation of the project.

We trust that this response adequately addresses the EPA's concerns.

Kind Regards

A handwritten signature in black ink, appearing to read 'A Robinson'.

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