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14 March 2025

Patrick Copas
Industry Assessments
Planning and Assessment Division
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Locked Bag 5022
PARRAMATTA NSW 2124

Via: *Major Projects Planning Portal*

EPA Submission on Modification Report – Elf Farm Supplies Pty Ltd

Dear Mr Copas,

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to provide comment on the Modification Report for the Elf Mushroom Farm and Substrate plant Expansion MOD 4 (MP08_0225-Mod-4) at 108 Mulgrave Road, Mulgrave NSW.

The EPA has reviewed the following documents:

- *Mushroom Substrate Plant Project Modification No 4 Modification Report* (version 1) – Perram & Partners – January 2025 (**Modification Report**)
- *Technical Memorandum – Air Quality and Odour Impact Assessment* (version 1) – The Odour Unit – 5 June 2024 (**AQOIA**)
- *Mushroom Substrate Plant Modification to Approved Expansion Odour Impact Assessment, Mulgrave NSW* (version 2) – The Odour Unit - 28 August 2015 (**the 2015 Odour Report**)
- *Elf Farm Supplies Pty Ltd Stormwater Management Report* (version 4) – Perram & Partners – January 2025 (**Stormwater Report**)

The EPA understands the proposal is for:

- Increasing current production from 2400 tonnes per week to 3200 tonnes per week
- Construction of four additional processing tunnels.
- Removing the Western Dam and installing 2 x 100,000L tanks for reuse of process water.
- Installing a new sedimentation basin and bioretention pond that will discharge to South Creek
- Relocating the biofilter, repurposing older mothballed tunnels, and construction of various ancillary infrastructure.

The site holds Environment Protection Licence (EPL) No. 6229 under the *Protection of the Environment Operations Act 1997* (POEO Act) for Composting and Waste Storage. From the information provided it is understood the proposal will require a variation to the EPL.

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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The EPA has reviewed the modification proposal and has provided comments and recommendations detailed in **Appendix A**. This includes additional information required by the EPA to complete its assessment. In addition to this information conditions relating to air quality, noise and waste are intended be included in the EPA's advice during the Response to Submissions stage and to be added to the final consent, if granted.

If you have any questions about this request, please contact Afnan Fazli via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gabby Sutherland', with a long horizontal stroke extending to the right.

Gabby Sutherland
A/Unit Head - Environment Protection Planning
NSW Environment Protection Authority



Appendix A – NSW Environment Protection Authority (EPA) Submission on Modification Report for proposed expansion of Elf Mushroom Farm and Substrate plant (Application MP08_0225-Mod-4) at 108 Mulgrave Road, Mulgrave NSW.

The EPA has the following comments and recommendations:

1. Matters to be addressed prior to determination

a. Water Management

The EPA recommends that water discharges proposed are characterised through a Water Discharge Impact Assessment (WDIA).

EPL 6229 currently does not have any discharge points on the licence. According to section 4.6.7 and 4.6.8 of the Stormwater Report, the ponds in the Eastern and South-Western Catchments will be discharging into South Creek.

While section 3 of the Stormwater Report discusses discharge requirements, this information is insufficient and does not provide a characterisation of the discharges proposed.

If discharges are proposed, a WDIA will be required to assess potential impacts of these discharges (See the EPA's [Water pollution discharge assessments](#) guidance for more information).

2. Minor matters

a. Waste Storage limit

The EPA recommends that the proponent clarify the maximum amount of waste that will be stored on site at any one time.

Condition L2.1 of EPL 6229 specifies that the amount of excess compost that is stored at the premises must not exceed 150 tonnes at any one time. The modification report does not discuss this limit with regard to the expansion of production from current processes.