

SEARs Scoping Report: MidCoast Regional Organics Processing Solution

A Submission to The Department of Planning,
Housing and Infrastructure on behalf of NALG

03 May 2025



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Glossary

Terminology	Definition
DCP	Development Control Plan (Great Lakes, 2014)
DPHI	Department of Planning, Housing and Infrastructure (NSW)
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act
EPA	Environment Protection Authority (NSW)
EPL	Environment Protection License
FOGO	Food Organics and Garden Organics
FO	Food Organics
LEP	Local Environmental Plan (Great Lakes, 2014)
LGA	Local Government Area
MRA	MRA Consulting Group
PoEO Act	Protection of the Environment Operations Act
SEPP	State Environmental Protection Policy
Tpa	Tonnes per annum
WARR	Waste Avoidance and Resource Recovery (Strategy)

Executive Summary

MidCoast Council (MCC) owns and operates a waste disposal and recycling facility at Darawank, near Tuncurry that services the needs of the local community and commercial businesses for waste disposal and resource recovery.

Due to the NSW mandate for all Councils to provide a collection service for food organics and garden organics (FOGO) by 2030, Council has sought an operator to establish FOGO processing in close proximity to the Tuncurry Waste Management Centre. NALG is contracted to provide a fully enclosed facility utilising In-Vessel Composting (IVC) and Dry Anaerobic Digestion (AD) technology.

The appropriate planning pathway is as State Significant Development, requiring an Environmental Impact Statement (EIS) to be submitted to the Department of Planning, Housing and Infrastructure for assessment and determination.

The facility would be established on a vacant lot with minimal land development. Due to proposed changes to the land, assessments associated with clearing and building will be required.

The Site may be associated with native or non-native cultural values, which require investigation prior to lodging the development application.

The use of the Site as a waste management facility has the potential to generate noise, traffic, offensive odour, air emissions, and stormwater discharge. Such matters will be assessed and included as part of the submission.

1 Introduction

MidCoast Council (MCC) owns and operates a waste disposal and recycling facility at Darawank, near Tuncurry that services the needs of the local community and commercial businesses for waste disposal and resource recovery.

Due to the NSW mandate for all Councils to provide a collection service for food organics and garden organics (FOGO) by 2030, Council has sought an operator to establish FOGO processing in close proximity to the Tuncurry Waste Management Centre. NALG is contracted to provide a fully enclosed facility utilising In-Vessel Composting (IVC) and Dry Anaerobic Digestion (AD) technology.

This document provides background information and an environmental scoping assessment for the issuing of the Secretary's Environmental Assessment Requirements for a State Significant Development (SSD) application.

The project is summarised in Table 1 below.

Table 1: Project Summary

Aspect	Project Summary
Key elements	The proposed composting facility is capable of processing up 146,000 tpa.
Location	Lot 5 of DP 1089990 Midge Orchid Rd, Tuncurry
Site areas	Total: Approx. 5.82 ha Hardstand: 8,900m ² Road and hardstand: 3,417m ² Covered Compost Area: 5,450m ² Office: 36m ²
Land Zone	RU2 – Rural landscape
Nearby land use	E4 – General industrial C2 – Environmental conservation SP2 – Waste and Resource Management Facility SP2 – Infrastructure (classified road)
Nearest residential	540 m west (boundary to residence) 415m (boundary to boundary) Note: a nearby residence is located 20 m west, owned by Mid-Coast Council, who will terminate the lease and demolish the property.
Landowner	Mid-Coast Council lease agreement
Nearest environmental receiver	600m west Wallamba River 1.4 km east Nine Mile Beach 150 m south Conservation Land

Aspect	Project Summary
Proponent	NALG Envirotech Pty Ltd ABN 27 662 479 549 ACN 662 479 549
Development	• Demolition and clearing • Earthworks • Construction works – buildings and structures • Access, roadworks, hardstand - Refer to concept site plan • Firewater and fire suppression systems • Infrastructure and provision of services • Electrical substations, electrical utilities • Drinking water infrastructure • Wastewater tanks • Recycled water tanks • Stormwater management • Leachate management
Technical data	• IVC Tunnels: 5 off 35m x 8m • Digesters: 2 off PF2100 • Compost production: 45,000tpa • Biogas production: 8,672,000 Nm³/a • Electricity production: 18,913,984 kWh/a
Processing Capacity	The composting facility will process up to 146,000 tpa, consisting of: • Council FOGO: 95ktpa • Commercial and industrial: paunch: 16ktpa • Agricultural residues: 15ktpa • Restaurants and supermarkets: 20ktpa
Operating Hours	Construction (including ancillary structures / development): • 7:00 am to 6:00 pm Monday to Friday. • 8:00 am to 1:00 pm Saturday. • No work on Sunday or public holidays. Operation of the composting operations: • 24/7 Receivals and offtake: • 24/7
Shifts	• 2 x 8hr shifts, shifts can be changed to work 2 x 12hr if required. For AD operations there is the ability to leave the facility operating unmanned and/or remotely monitored. • Working days per week: Monday to Saturday.

Aspect	Project Summary
Employment	Number of operational staff: 8 Breakdown of operational staff per shift: 4 Number of office staff: 4 Number of construction workers: 22-26
Capital Investment Value	The development will have an approximate CIV of \$56M
Transport Rates	Trucks will be backloaded for offtake. 35 trucks per day, including: • Council trucks • B-doubles • Semi-trailers
Parking spaces	12 plus 1 disabled car parking space

1.1 The Applicant

Name of Applicant	NALG Envirotech Pty Ltd, trading as NALG
Address	Level 3, Suite 303, 7-9 Irvine Place, Bella Vista NSW 2153
ABN	27 66 2479 549

NALG specialises in environmental technology solutions, specialising in water treatment, waste management, pollution control and sustainability services. NALG in conjunction with various technology partners (KANADEVIA INOVA & GICOM) have over 40 years combined industry experience in designing, building and operating organic waste management sites utilising advanced technology. The company focuses on using adaptable design to ensure their facilities are self-sustaining, meaning they produce their own energy and water, reducing the impact on the external environmental resources. These solutions allow the conversion of organic waste into valuable resources including nutrient-rich compost, biogas, biochar, and liquid fertilisers, while simultaneously minimising greenhouse gas emissions and reducing landfill disposal.

1.2 Objectives

The primary objectives of MidCoast Regional Organics Processing Solution (MC ROPS) project are as follows:

- To provide MidCoast Council with a FOGO processing solution by July 2027.
- To provide additional capacity to process commercial sourced organics and liquid food waste.
- To produce valuable end product compliant with AS4454-2012.
- To have the flexibility to cater for feedstock variability and contamination whilst producing a consistent high value end product.
- To construct a facility with a minimum plant life of 30 years.

1.3 Description of Project

The MidCoast Regional Organics Processing Solution (MC ROPS) is a fully enclosed FOGO facility utilising In-Vessel Composting (IVC) and Dry Anaerobic Digestion (AD) technology to process organic waste and produce high-quality compost end products. The facility will be comprised of a receival building, pre-treatment and contamination management, IVC tunnels with enclosed maturation, digester and biogas equipment, and air treatment system including biofilter and scrubbers to process contracted MidCoast Council waste. The proposed operational capacity is 146,000tpa, providing the capacity to process both MidCoast Council FOGO, self-haul material and additional organics sourced from commercial and industrial arisings.

The facility will be located on Midge Orchid Rd, Darawank, LOT 5, DP 1089990.

1.4 Background

The proposed development is a response to the need for a food and garden organics processing facility in the MidCoast Council region. In 2023 MidCoast Council offered a tender to construct, design and operate an organics processing facility. NALG was the successful tenderer with their compost and anaerobic digestion technology.

The Site is owned by MidCoast Council and will be leased to NALG.

1.5 Related Developments

The Tuncurry Waste Management Facility is run by MidCoast Council and is located approximately 17 m to the east (across the road). This development will be an extension of the services offered in the region for waste management, however it will operate independently of the Tuncurry Waste Management Centre.

1.6 Consents

1.6.1 Development Consent

The site is currently vacant. A search of Council records has been submitted for previous development consents. No data has been returned yet.

This will be a new application for development consent to both build and operate the site, which is State Significant.

The proposal is considered State Significant Development due to the throughput material and the value of the development being development of a composting facility with an estimated development cost of more than \$30 million and being development of a resource recovery facility that handles more than 100,000 tonnes per year of waste (Clause 3 and Clause 23, Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021*).

1.6.2 Licensing

The volume and type of materials causes the facility to require a licence under Schedule 1 of the *Protection of the Environment Operations Act 1997*. MidCoast Council is in the Regional Levy Area and is therefore in the regulated area.

The relevant licence thresholds are:

Waste storage –

- (i) in the case of premises in the regulated area—more than 1,000 tonnes or 1,000 cubic metres,
- (i) in the case of premises in the regulated area—6,000 tonnes received from offsite per year,

Composting –

(a) where it takes place inside the regulated area, ...

(i) it has on site at any time more than 200 tonnes of organics received from off site, or

(ii) it receives from offsite more than 5,000 tonnes per year of non-putrescible organics or more than 200 tonnes per year of putrescible organics...

(3) For the purposes of this clause, 1 cubic metre of organics is taken to weigh 0.5 tonnes.

2 Strategic Context

2.1 NSW Waste and Sustainable Materials Strategy 2041 – Stage 1: 2021-2027

The NSW Waste and Sustainable Materials Strategy identifies the need for recycling infrastructure to keep up with growing demand.

The Strategy outlines a target of 80% average recovery rate from all waste streams by 2030, a target which this proposed MRF would contribute towards for both municipal and commercial commingled recycling. The proposed MRF would achieve a target of 90% recovery of these streams and landfill only 10% per annum of inert, unusable residual waste.

A key focus area is to reduce carbon emissions by better waste and materials management, which is to be achieved in part by mandating the separate collection of food and garden organics from all NSW households by 2030. Hence new and enlarged FOGO processing facilities are required as priority infrastructure.

This proposal supports the objective of removing food waste from household bins and reducing carbon emissions by providing upgraded capacity for management of FOGO throughout the Council area.

2.2 NSW EPA Food and Garden Organics Mandates Proposal Paper

In 2024, the NSW EPA outlined the FOGO collection proposal to:

- Mandate food organics (FO) collections for certain businesses and
- Mandate food and garden organics (FOGO) collections for households

The proposal has since been adopted and passed as the *Protection of the Environment Legislation Amendment (FOGO Recycling) Bill 2025*.

The adoption of the FOGO Bill commences on 1 July 2026 for businesses and scales up by 1 July 2030 to include additional businesses and residential accommodations.

Councils are obliged to provide:

- Collection bins for FOGO bins and
- Collection of food organics bins or organics collection bins at least once a week and
- Collection of garden organics bins at the appropriate interval.

This project is key for MidCoast Council to being able to effectively manage FOGO and Food (FO) wastes under the new framework.

2.3 EPA Strategic Plan 2024-29

On August 1st, 2024, the NSW EPA released its 'Strategic Plan 2024-29'. This plan aims to clarify the EPA's role and relationship with government, business and the community. The vision of the EPA is for a healthy environment, healthy community and healthy business.

The plan outlines objectives for the for innovative management of waste. The NSW EPA's Key success measures are set as follows:

- Illegal dumping reduced by 30% by 2020;
- Volume of littered items reduced by 40% per 1000 square metres by 2020 – Container Deposit Scheme implemented by 1 December 2017;
- Zero growth in per capita waste generation by 2021–22;

- Recycling rates increased to 70% for municipal solid waste and commercial and industrial waste, and 80% for construction and demolition waste by 2021–22;
- Waste diverted from landfill increased from 63% (in 2010–11) to 75% by 2021–22;
- 90% of NSW households have access to problem waste services.

The objective most relevant to the proposal is 70% diversion from landfill of municipal solid waste, which requires appropriate infrastructure upgrades by facilities which receive the diverted materials. The expansion of processing capacity at the Tuncurry Facility will allow kerbside FOGO processing and assist Council in achieving the 70% target.

2.4 MidCoast Council Waste Strategy 2030

This Waste Management Strategy for MidCoast Council (MCC Strategy) focuses on the sustainable management of waste until 2030.

Focus 2 of the MCC Strategy identifies resource recovery and their re-use by:

- Achieving a 70% kerbside recycling rate by 2030
- Achieving a 50% diversion rate from all waste sources (MSW, C&I and C&D)
- Halve the amount of organic waste sent to landfill from kerbside collections
- Increase the use of recycled materials in Council operations

The strategy identifies that the improvement of source separation can be achieved through the development of kerbside services. The proposed development provides the necessary processing capacity to receive an expanded kerbside FOGO collection from the wider LGA.

2.5 National Waste Policy (2018)

The National Waste Policy supports a coherent, efficient and environmentally responsible approach to waste management in Australia. The policy, agreed by all Australian environment ministers, sets Australia's waste management and resource recovery direction to 2030.

The five principles of the circular economy which are embedded in the National Waste Policy are to:

1. Avoid waste: - Prioritise waste avoidance, encourage efficient use, reuse and repair - Design products so waste is minimised, they are made to last and we can more easily recover materials.
2. Improve resource recovery:
 - Improve material collection systems and processes for recycling
 - Improve the quality of recycled material we produce.
3. Increase use of recycled material and build demand and markets for recycled products.
4. Better manage material flows to benefit human health, the environment and the economy.
5. Improve information to support innovation, guide investment and enable informed consumer decisions.

The policy identifies 14 priority strategies that would benefit from a national and/or coordinated approach. These strategies provide focus to the work across individual jurisdictions, build on current directions and complement existing activity. They also provide clarity and direction for business and the community.

Strategy 12 identifies the reduction of organic waste as a priority:

Reduce organic waste, including garden and food waste, by avoiding their generation and supporting diversion away from landfill into soils and other uses, supported by appropriate infrastructure.

This objective is strongly supported by the Proposal through the composting of FOGO waste streams.

2.6 Cumulative Impacts

The development would not be of a scale to cause significant negative cumulative impacts. Impacts will be limited by the management of the process onsite, and are not expected to cause detriment to the environment or to the surrounding neighbourhood.

The overall effect of the development will be of lasting benefit for present and future generations through the modernisation of waste management services.

3 Project

3.1 Site Description

The proposed compost site is adjacent to the Tuncurry Waste Management Centre, and is formally described as:

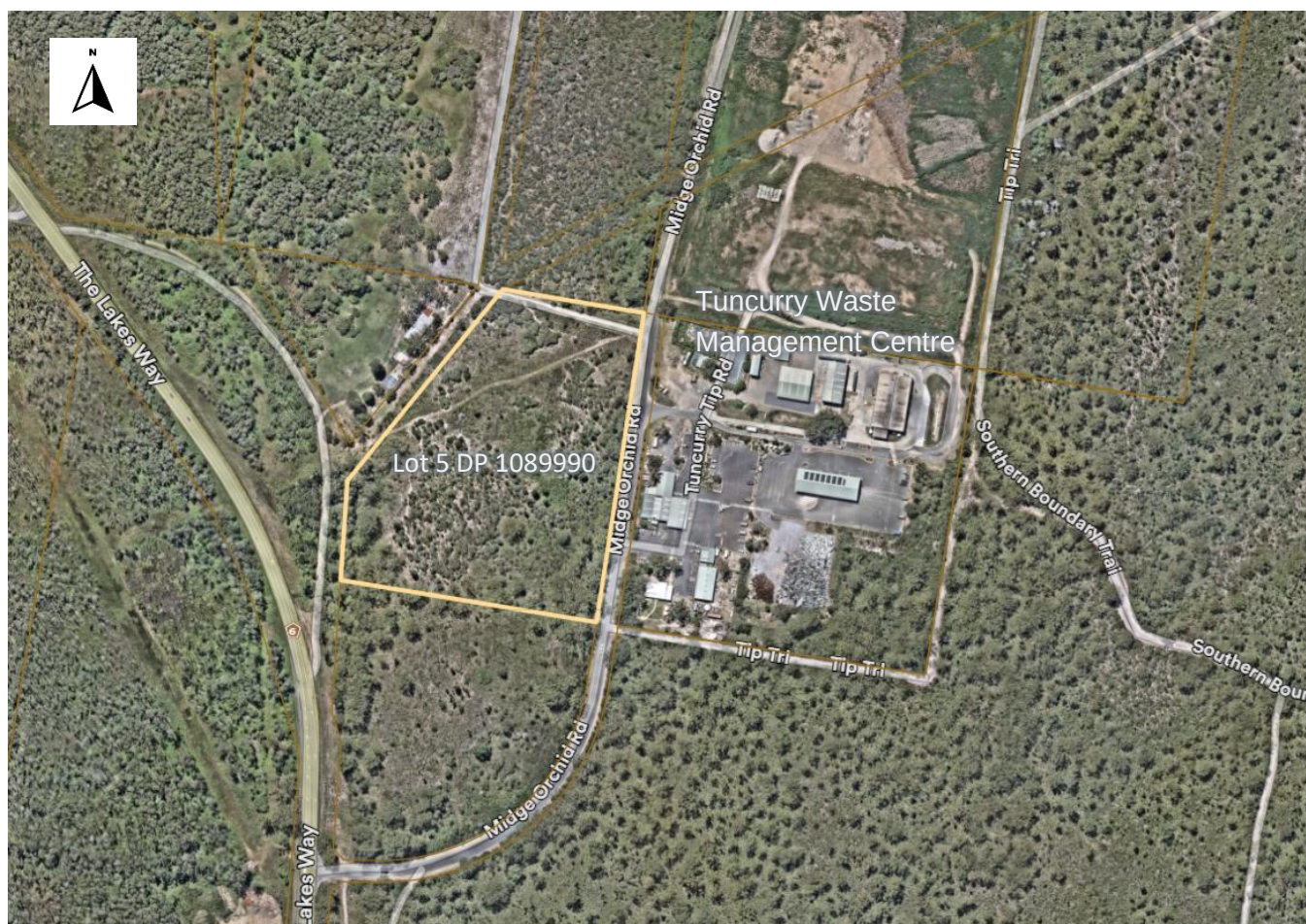
- LOT 5, DP 1089990.

The proposed compost site, hereafter referred to as 'The Site', is approximately 5.82 ha. Access is via Midge Orchid Road.

The Site is currently undeveloped land, characterised by temperate grassland vegetation.

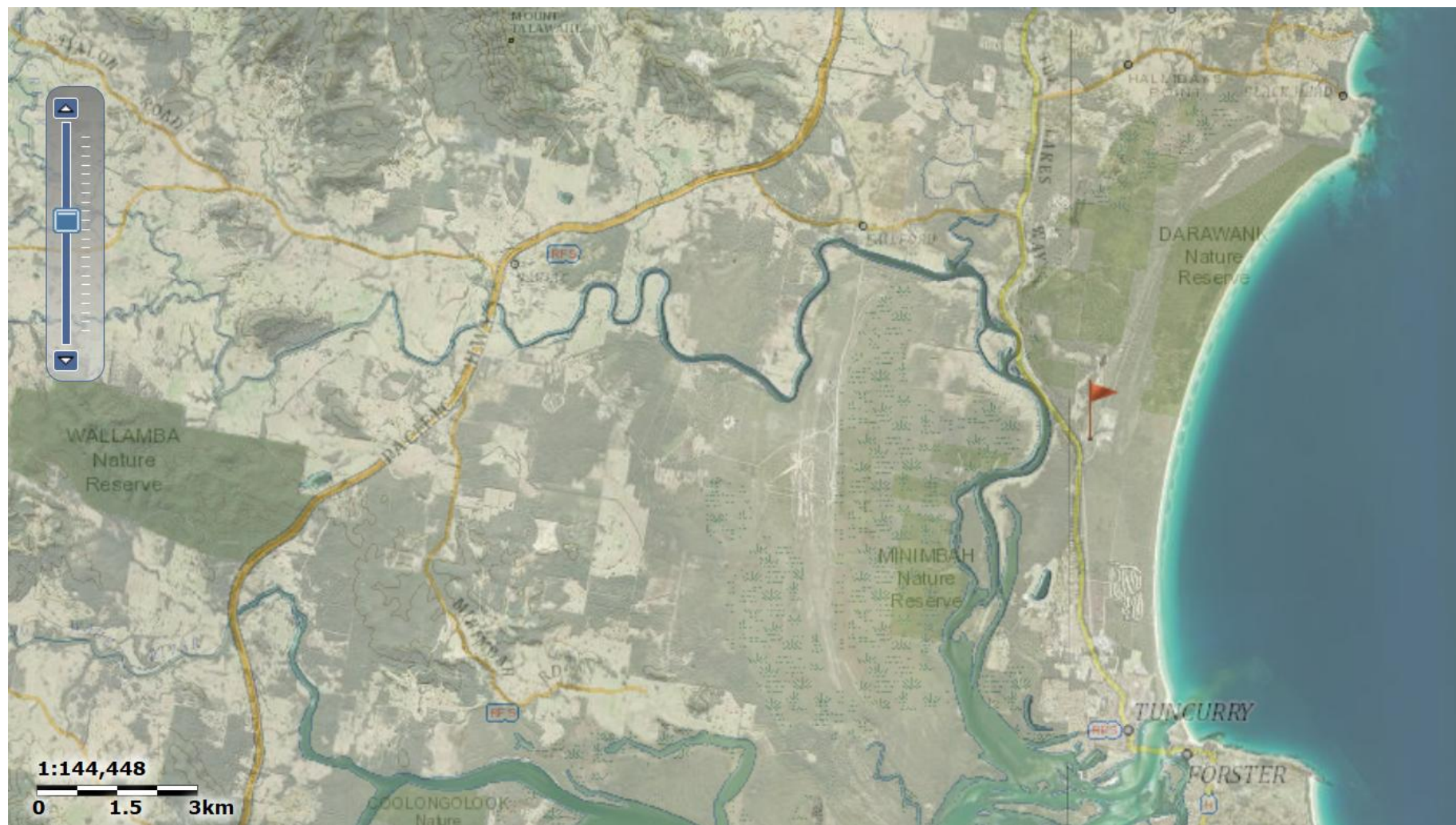
The Site is shown in Figure 1. The Site in a broader context is shown in Figure 2.

Figure 1: Site location



Source: Near Maps, 2025

Figure 2: Locality



Source: SIX Maps 2025

3.2 Surrounding Area

The Site is approximately 3km north of the Tuncurry township. The surrounding area is characterised by conservation zones, scattered rural residential dwellings, and Nine Mile Beach. The Wallamba River is approximately 1km west.

Midge Orchid Rd is used as the access for the Tuncurry Waste Management Centre and Hallidays Point Sewerage Treatment Works. Although there is a residence immediately west of the proposed facility, it is owned by Council and will be vacated prior to works commencing.

The proposed development would be an extension of the services offered by the Tuncurry Waste Management Centre, located on the opposite side of the road, to the east.

The centre includes:

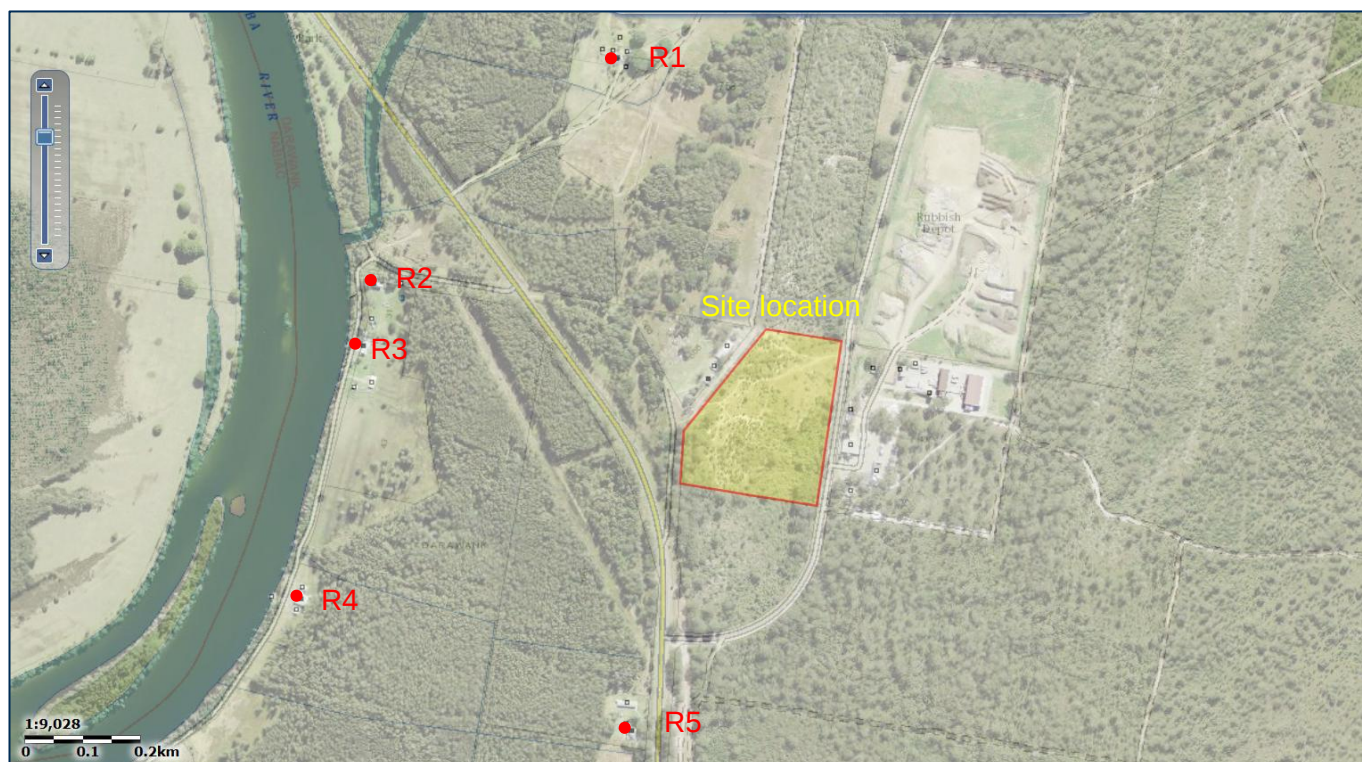
- A Community Recycling Centre for problem waste
- Reviva - 'Tip Shop'
- Materials Recovery Facility
- Men's Shed
- Bicycle repair workshop - Green Bikes
- The Green - community garden
- Education centre

Being proximate to The Lakes Way, there is provision of road infrastructure for vehicles accessing the Site. The Lakes Way serves as the connection to Tuncurry from The Pacific Highway, either directly or via Failford Rd.

Distances to residential receivers are approximately:

	Direction from facility	Distance to residence (m)	Distance to boundary (m)
R1	North-west	530	510
R2	West	591	500
R3	West	570	415
R4	West	680	610
R5	South	430	85

Figure 3: Sensitive receivers

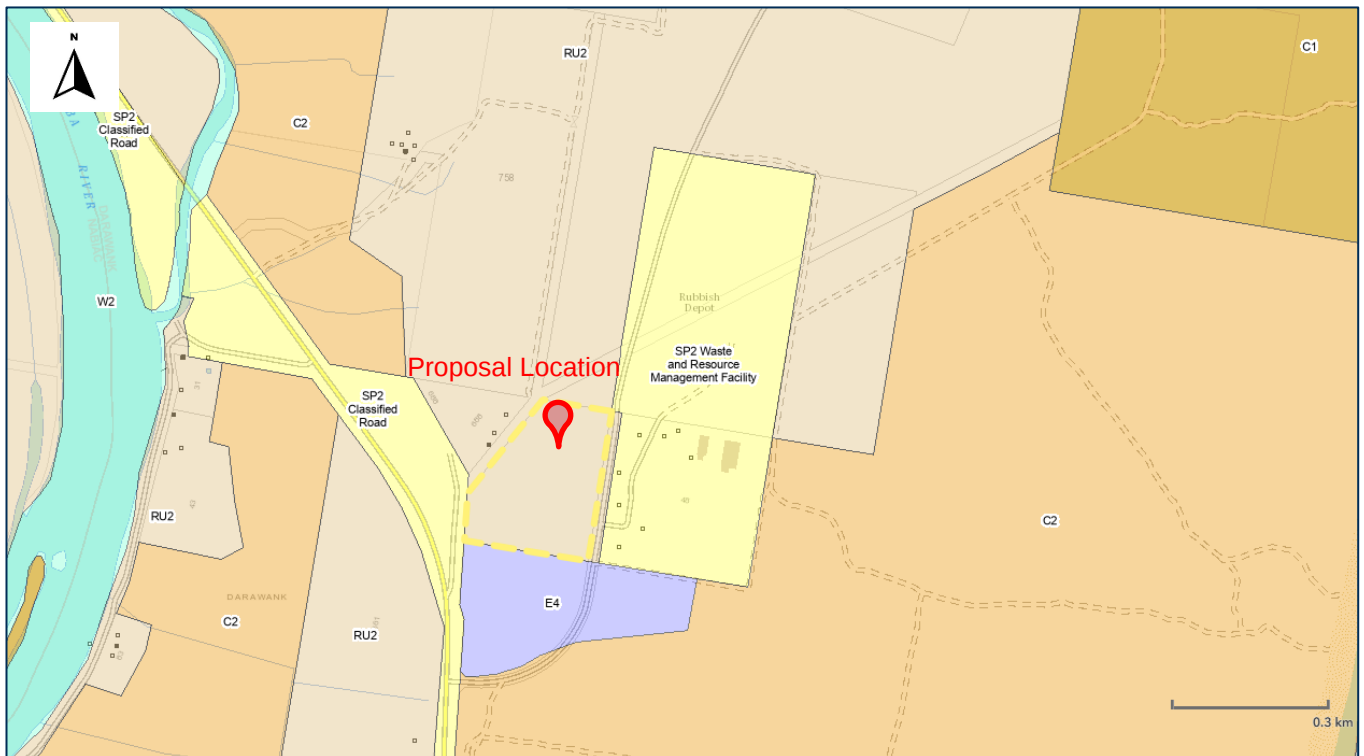


Source: Sixmaps, 2025

3.3 Zoning

The Site is zoned RU2 – Rural Landscape. Surrounding land zones include E4– General industrial, W2 – Recreational Waterways, and C2 – Environmental Conservation.

Figure 4: Zoning



Source: NSW Planning Portal Spatial Viewer, 2025.

3.4 Outline of the Proposal

3.4.1 Site Works

Works are outlined in detail in Appendix B and include:

- Site preparation
- Earthworks
- Road pavements
- Landscaping and screening
- Weighbridge installation
- Stormwater and drainage services
- Sewer works
- Potable water supply
- Waste water system
- Electrical and communication
- Provision of fire services
- Construction and fit out of receival building
- Construction and fit out of in vessel compost (IVC) tunnels
- Construction and fit out of dry anaerobic digestion equipment
- Construction and fit out of semi-enclosed aerated maturation area
- Construction and fit out of air handling system, including odour control

- Provision of a leachate management system
- Provision of compost process control system.

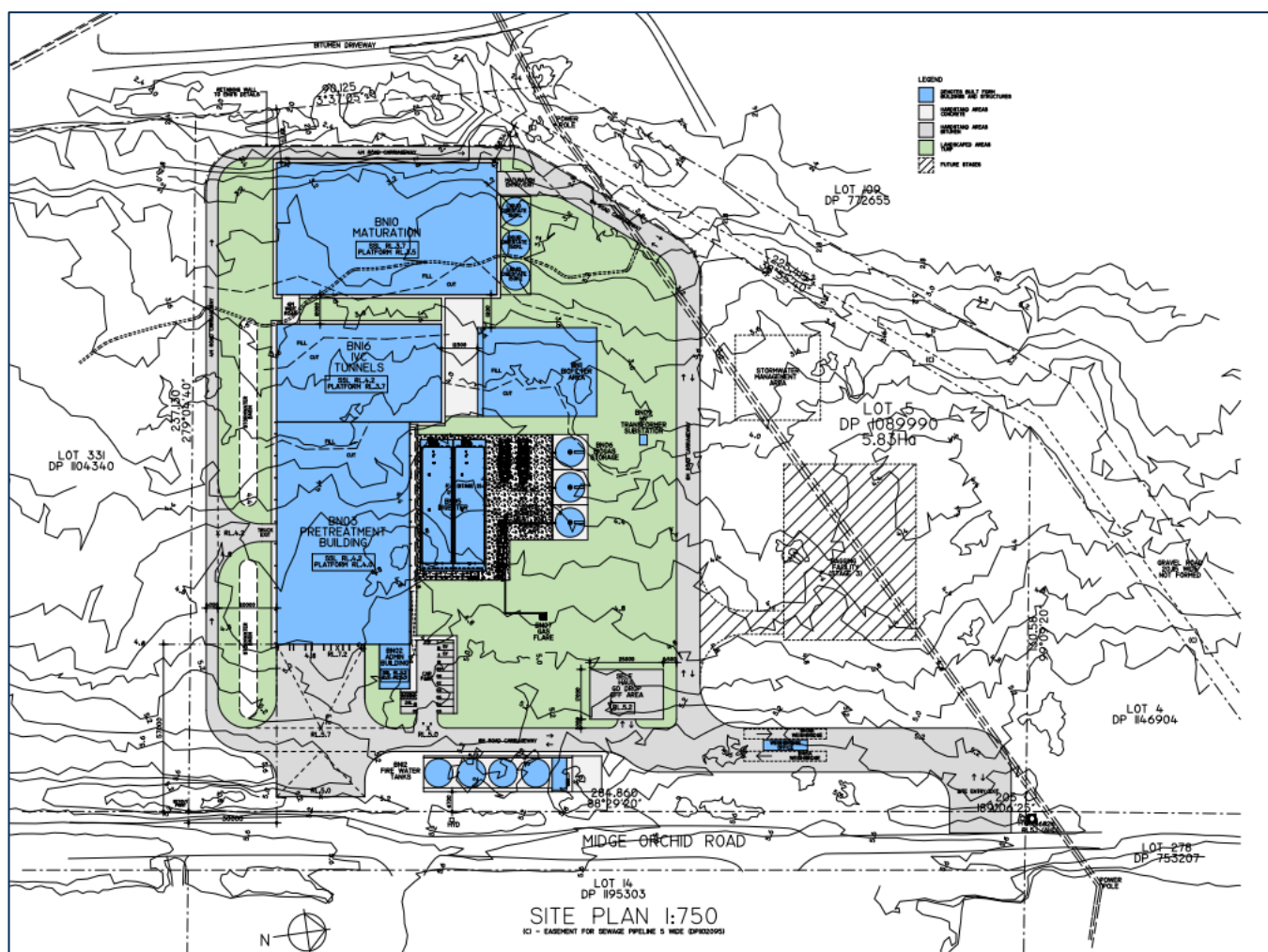
3.4.2 Layout

The preliminary layout is shown in Figure 5, below and provided in Appendix C.

The facility would include:

- Fully enclosed receival building
- In-vessel composting tunnels
- Dry anaerobic digester, biogas handling and combined heat and power unit
- Digestate dewatering system
- Semi-enclosed maturation building
- Odour and particulate matter control including scrubber and biofilter
- Stormwater and leachate management

Figure 5: Layout



Source: NALG

3.4.3 Technology

MC ROPS will be a fully enclosed facility utilising NALG in-vessel composting (IVC) tunnels, Kanadevia Inova's Kompogas dry anaerobic digestion (AD) system, a semi-enclosed maturation area, and an air handling system comprising of extraction, multistage scrubbing and biofiltration to manage odours.

Utilising IVC and AD technology, the facility will process organic waste and produce high-quality compost end products and green energy.

3.4.4 Inputs and outputs

Inputs would be sourced from:

- Councils - Food & garden organics
- Commercial & Industrial - Paunch, dissolved air flotation residue, offal
- Agriculture - Poultry manure, layer hen, shed cleanout
- Commercial Restaurants - Grease trap, expired drinks
- Supermarkets - Commercial food waste, expired food

Outputs are in the form of compost and biogas. Compost would be distributed in bulk for use, or for packaging and resale.

3.4.5 Uses and Activities

The proposed activities will include:

1. Arrival

Incoming vehicles utilise two weighbridges for entering and exiting to record incoming and outgoing loads in accordance with EPA record-keeping requirements. The use of two weighbridges facilitates efficient operations during periods of high-volume truck movements to and from the Site, with all operations being managed by an attended weighbridge office

2. Receiving

Trucks offload organic material into receiving bunkers in order to be visually inspected for the removal of large contaminants.

3. Sorting and shredding

A staffed semiautomatic stationery bulks material handler/ gantry crane loads the waste into a feed hopper, the materials handler also separates any larger contaminants prior to feeding the hopper. Material containing over 5% contamination will be rejected. The hopper directs the material to an overhead belt magnet and screen which separates it into two fractions: undersize ($\leq 50\text{mm}$) and oversize ($> 50\text{mm}$). The undersized fraction, primarily consisting of food and grass clippings, is fed into the AD system via automatic gantry crane.

The oversized fraction, consisting of large woody organics, is directed to a shredder to reduce the size to $< 80\text{mm}$, then loaded into the IVC tunnels.

4. Processing

a. Anaerobic Digestion System

The undersize and food organics are processed through the AD system. Pasteurised digestate from the AD system is dewatered, and the solid digestate is sent to the mixing bunker.

Liquid digestate is sent to a liquid digestate storage tank, which is used for moistening the oversized garden organics in the IVC tunnel systems.

The AD process generates biogas, which can be upgraded to separate biomethane from biogenic CO₂. A Combined Heat and Power (CHP) unit will be used to generate green electricity from the biogas. The waste heat from the CHP could be used for the composting process and the maturation process.

b. Composting – IVC Tunnels

Oversize materials are transferred to composting area. During pasteurisation, microbes progressively break down organic material, creating heat and releasing nutrients. Organic matter naturally heats to over 55°C for at least 3 days. Pasteurisation of material induces pathogen and weed seed destruction. Recycled water and liquid digestate may be used during pasteurisation via collection from the leachate system.

After pasteurisation and drying in the tunnels, the material is transferred to a second screen, which separates the fine fraction from the overs. This type of screening process is effective due to the fact that the material is dry and separating organics is easier. The fine fraction is directed to maturation bay or blending line and proceeds to a windsifter and third screen to remove plastics and isolate high value fresh compost.

The pasteurised and dried overs are sent to the sorting cabin to remove the contaminants. The cleaned oversize is sent to a mixing bunker.

c. Mixing

Pasteurised solid digestate from the AD is mixed with pasteurised oversize from the IVC tunnels and then loaded on to the aerated maturation floor for aerobisation and maturation. The mixing process allows the overs to absorb moisture from the digestate and provide structure to the sludge-like digestate to allow proper aeration.

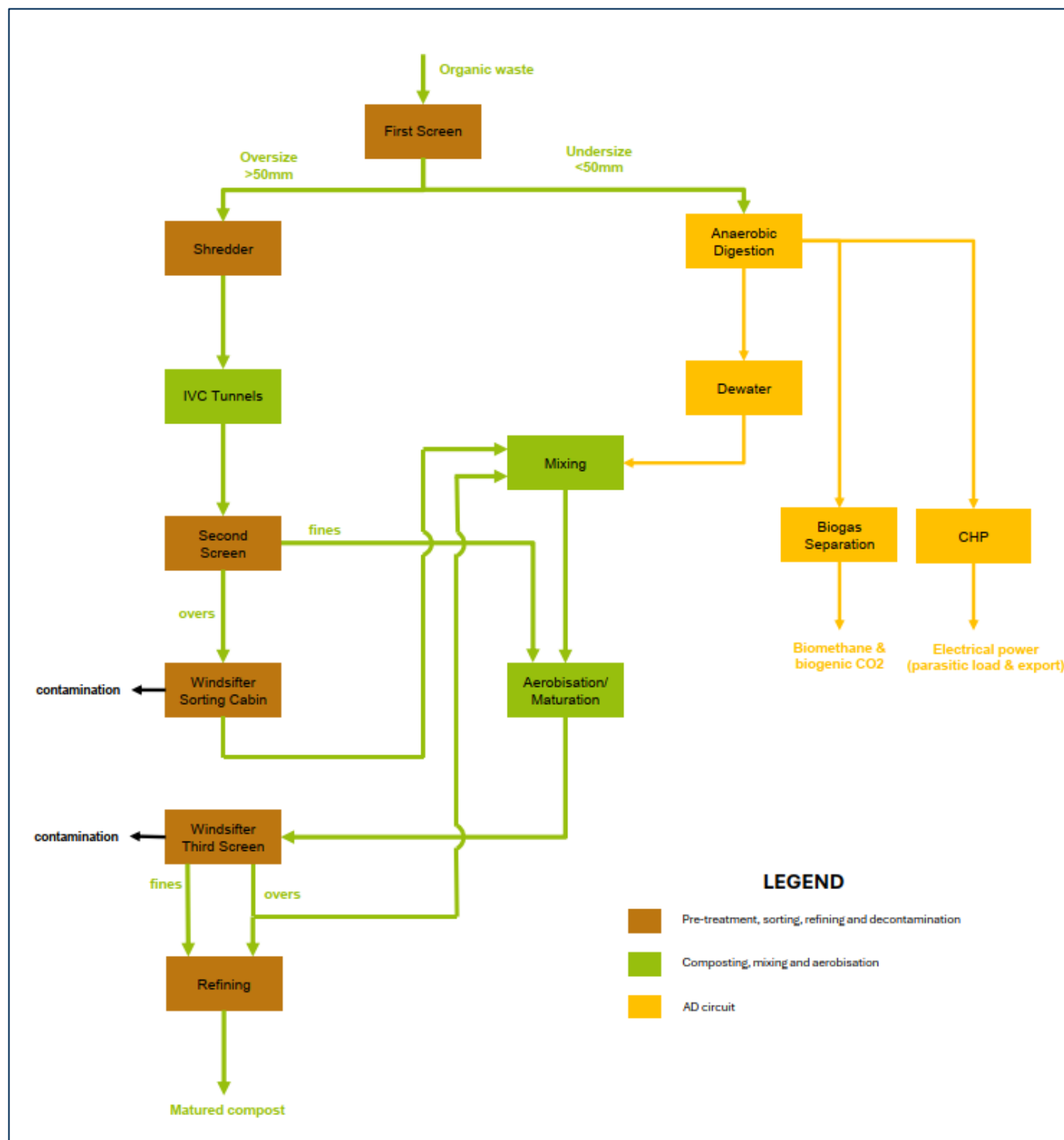
d. Maturation

The mixture is piled into aerated bays for further aeration and maturation. After aerobisation and maturation, the material is directed to the windsifter and third screen for final processing. As the process progresses the oxygen demand decreases and temperatures decline. Maturation requires clean water to avoid contaminating the product with pathogens and to keep dust under control.

5. Offtake

Compost is stockpiled within the building for bulk distribution.

Figure 6: Process flow



Source: NALG

3.5 Capital Investment Value

The total estimated cost of this project, including equipment and construction cost, is approximately \$56 million.

3.6 Staff

Operation of the facility will result in employment of up to 8 full time staff to operate equipment and machinery over two shifts. 4 office staff would be employed.

Amenities (such as ablutions and kitchen) will be provided onsite. It is expected that drivers will spend much of their time offsite and use facilities elsewhere.

3.7 Operating Hours

NALG proposed construction hours are:

- 7:00 am to 6:00 pm Monday to Friday.
- 8:00 am to 1:00 pm Saturday.
- No work on Sunday or public holidays.

NALG propose to operate the facility 24 hours a day, 7 days a week.

- Delivery and offtake times – 24/7
- Operation hours for composting operations – 24/7

3.8 Timing and Delivery

The delivery of the project is required by MidCoast Council by July 2027, with the goal for approvals to be completed by January 2026.

The project is not staged development.

3.9 Restrictions or Covenants

There are no known restrictions or covenants.

3.10 Alternatives

The following options were considered for implantation at the facility:

3.10.1 Objectives

The primary objectives of MC ROPS project, as stated above, are as follows:

- To provide MidCoast Council with a FOGO processing solution by July 2027.
- To provide additional capacity to process commercial sourced organics and liquid food waste.
- To produce valuable end product compliant with AS4454-2012.
- To have the flexibility to cater for feedstock variability and contamination whilst producing a consistent high value end product.
- To construct a facility with a minimum plant life of 30 years.

3.10.2 Option 1: No Action Option

Under this option, the proposed composting facility would not be developed, and the Site would remain in its current, undeveloped condition. No earthworks, construction or changes to land use would occur under this alternative.

The NSW Government's mandate to implement Food Organics and Garden Organics collection services for all households by 2030 requires councils to introduce FOGO services to divert the amount of organic sent to landfill. Without the proposed development and expansion of composting operations, Council

would be required to collect organics, but would not host a processing facility, causing inefficiencies in management of FOGO materials.

Furthermore, the proposed location is currently vacant. Under the No Action option, there would be no utilisation of the Site for improvements to waste management from waste facility expansion and the project objectives would not be met.

3.10.3 Option 2: Processing of food and organics at 99,000 tpa at the proposed site

NALG initially proposed to have an operational capacity of 99,000 tpa in order to avoid the proposal being under the State Significant Development classification. However, the proposed facility's high capital investment exceeds \$30 million, which triggers State Significant Development (SSD) regardless of the throughput.

With the capital investment value of the project exceeding \$30 million, there was strategic decision to optimise the facility's financial viability. Increasing the proposed throughput capacity to 146,000 tpa not only addresses the regions needs for organic waste diversion but also creates enhanced revenue-generating potential.

3.10.4 Option 3: Processing of food and organics at food and organics at 146,000 tpa at the proposed site

A throughput of 146,000 tpa would not require significant additional investment or infrastructure to be established. Considering the the development is already State Significant, NALG has chosen a throughput that would capture the regional demand for food, FOGO, and agricultural residue processing. Development at 146,000 tpa is able to meet all the objectives of the project.

3.10.5 Option 4: Processing on food and organics at an alternative location

The identified location, adjacent to the existing waste management centre, enables a parcel of land to be set aside exclusively for composting over a long period of time. It is suitably located away from sensitive receivers and in close proximity to the existing waste management facility.

The Site is offered under a lease agreement by MidCoast Council. There is hence no other likely alternative.

3.10.6 Option 5: Use of different technology for the processing of food and organic waste

NALG specialises in advanced technology solutions for organics composting. The proposed technology was selected in a competitive tender as the preferred method of processing. Hence, various options have already been explored and rejected during the tender process.

3.10.7 Preferred Option

Option 3: Processing of food and organics at 146,000 tpa at the proposed site, is the preferred option as it meets the objectives of the project and provides capacity for large quantity of regional inputs to be processed.

4 Statutory Context

The key matters for consideration under the Environmental Planning and Assessment Act, 1979 (EP&A Act), the Environmental Planning and Assessment Regulation, planning instruments and are summarised in Table 2. There are no present concept plan approvals or staged DA consents.

Table 2: Statutory Context

Matter	Comment
Power to grant consent	Section 4.36(2) of the <i>Environmental Planning and Assessment (EP&A) Act 1979</i> provides that a State Environmental Planning Policy may declare any development, or any class or description of development, to be SSD. The proposal is deemed SSD in accordance with Clause 3 in Schedule 1 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP). The development is captured as: <i>3 Agricultural produce industries and food and beverage processing:</i> <i>Organic fertiliser plants or composting facilities or works with an estimated development cost of more than \$30 million.</i> And <i>23 Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.</i> The consent authority is hence the Planning Minister, who may delegate authority to senior officers of the department.
Permissibility	The proposal is considered permissible with development consent. The development is <i>not</i> within the definition of an agricultural produce industry under the <i>Great Lakes Local Environmental Plan 2014</i>. Hence it would be considered to be a Waste Management Facility. Although a waste management facility is not permissible in RU2 zoning under the LEP, it is permissible as under Division 23 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>.
Other Approvals	Approvals are required for: Licensing from the Environment Protection Authority, under the <i>Protection of the Environment Operations Act</i>. Works within the road reserve from MidCoast Council, under the <i>Roads Act 1993</i>. Water, sewer and stormwater drainage works from Mid-Coast Council under the <i>Local Government Act 1993</i>. Land Clearing under the <i>Local Land Services Act 2013</i> (LLS Act)

Matter	Comment
Pre-Conditions to exercising the Power to Grant Consent	Under Section 4.15 of the EP&A Act the consent authority must consider the following relevant matters for consideration: (a) the provisions of— (i) any environmental planning instrument – (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved) – • None (iii) any development control plan: • Does not apply to SSD (iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4: • None (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph) (v) (Repealed) that apply to the land to which the development application relates, (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality: (c) the suitability of the site for the development, (d) any submissions made in accordance with this Act or the regulations, (e) the public interest.
Mandatory matters for consideration	The land is affected by: • Classified Road adjacent • Biodiversity values mapping • Bushfire prone land • Low Acid sulfate soil risk >3m • Land near electrical infrastructure
Planning Instruments	Planning instruments include: • State Environmental Planning Policy (Biodiversity and Conservation) 2021. Koala habitat,

Matter	Comment
	• State Environmental Planning Policy (Resilience and Hazards) 2021 – consideration of potentially hazardous or offensive development, coastal management, • State Environmental Planning Policy (Planning Systems) 2021 – State Significant Development • State Environmental Planning Policy (Transport and Infrastructure) 2021 – traffic generating development • State Environmental Planning Policy (Industry and Employment) 2021 – advertising and signage • State Environmental Planning Policy (Sustainable Buildings) 2022 – GHG Reporting • Great Lakes Local Environmental Plan 2014 – mapped provisions • Protection of the Environment Operations Act - licensing • Protection of the Environment Operations (Waste) Regulation 2014 – waste reporting • Crown Land Management Act 2016 – adjacent to crown land • Water Management Act 2000 – environmental protection – water quality; water management work • Local Land Services Act 2013 – sensitive land • National Parks and Wildlife Act 1974 – heritage conservation • Commonwealth Environmental Protection and Biodiversity Conservation Act 1999 – biodiversity protection

Table 3, below identifies LEP maps and overlays to the subject site:

Table 3: LEP overlays

Overlays	
Site mapped	• FSR 0.4:1 • Height of buildings 8.5m • Land zoning – RU2 • Lot size 40ha • Terrestrial Biodiversity • Urban release area map adjacent • Acid Sulphate Soils – Class 4 • Partially flood prone land

Overlays	
Site not mapped	• Heritage • Land Reservation Acquisition • Foreshore Building Line • Active Street Frontages • Dwelling Density • Drinking Water catchments • Wetlands • Coastal Risk Planning

5 Community Engagement

5.1 Consultation Approach

Consultation will occur through the request for SEARs from the DPHI and by direct engagement.

5.1.1 Engagement Plan

NALG is committed to meaningful engagement to provide relevant information and adequate opportunity for response.

A Consultation Plan will be developed to include:

- Local residents;
- Users of the Tuncurry Waste Management Facility; and
- Regulatory authorities.

5.2 Local Communities

Community consultation with local communities will be undertaken as part of the project. The local community will be notified and given opportunity to respond.

Feedback received will be considered as part of the development application.

5.3 Authorities

5.3.1.1 MidCoast Council

A Council meeting with MidCoast Council (Council) was held on April 8th, 2025, to discuss the proposed development.

Matters were discussed in relation to:

- Traffic
- Stormwater management;
- Biodiversity assessment;
- Acoustic assessment;
- Groundwater impacts; and
- Visual impacts.

Council will be engaged by DPHI in the SEARs process to provide their formal assessment requirements.

5.3.1.2 Department of Housing and Infrastructure

A meeting with the Department of Housing and Infrastructure (DPHI) has been requested to obtain feedback on the proposal.

6 Proposed Assessment of Impacts

6.1 Environmental Objectives

Key environmental objectives relating to the design and operating procedures of organics processing facilities are identified by the EPA in the *Environmental Guidelines for Composting and Related Organics Processing Facilities* 2004. They generally relate to:

- Odour
- Particulate matter
- Methane gas management
- Air emissions
- Water pollution
- Storage and stockpiling
- Noise
- Litter
- Security; and
- Fire management

6.2 Construction Impacts

Works for the construction/installation of composting infrastructure include:

- Site preparation
- Earthworks
- Road pavements
- Weighbridge installation
- Stormwater and drainage services
- Sewer works
- Potable water supply
- Waste water system
- Electrical and communication
- Provision of fire services
- Construction and fit out of receival building
- Construction and fit out of in vessel compost (IVC) tunnels
- Construction and fit out of in anerobic digestion
- Construction and fit out of enclosed aerated maturation area
- Construction and fit out of air handling system, including odour control
- Provision of a leachate management system
- Provision of compost process control system

Potential impacts are able to be contained by standard mitigation measures that will:

- Control emissions to stormwater or groundwater;
- Minimise noise impacts;

- Manage litter and waste;
- Mitigate impacts to flora and fauna; and
- Manage impacts to items of heritage significance, should they be discovered.

The Site presently has overhead power distribution lines running south-west to north-east. The current phase of development will not affect the power lines as no large structures will be built underneath. MidCoast Council is investigating the relocation of the power lines toward the perimeter of the Site.

6.3 Built Form

The built form of the Site would be developed to be reasonably consistent with the surrounding natural habitat, considering also the industrial development type.

Further details will be provided including:

- External finishes and materials;
- Site Plans;
- Sections;
- Architectural Drawings; and
- Landscape Plan.

6.4 Waste Management

The purpose of the facility is to manage waste to improve recycling and resource recovery. The overall impact on waste management would therefore be positive.

6.4.1 Waste generation

During the construction phase waste may be generated from site preparation works and the construction of buildings and infrastructure.

The use of the Site would result in quantities of waste from office and general use, such as packaging, food scraps, and ordinary waste materials. Such materials will be collected and taken to a lawful facility. Recycling will be implemented as feasible.

The processing of organic materials would result in minimal residual waste generation from contaminated input material. Contaminants will be removed during the process and contained within a lidded bin prior to disposal. Any waste that is dispatched from the Site for disposal or further processing will be sent to a facility that can lawfully receive it.

A waste management plan (WMP) will be provided as part of the application that assesses construction and operational waste management.

6.4.2 Waste operations

The facility will be subject to licensing and will operate in accordance with licence and reporting requirements.

The products of organics processing are able to be applied to land without further approvals under the *Compost Order 2016* and the *Compost Exemption 2016*.

6.5 Traffic, Access, and Parking

Access to the Site would be via Midge Orchid Road, which is a local road that joins The Lakes Way approximately 660m from the proposed entrance. There is no alternative route available for vehicular transport. For reference, see Figure 7.

The Lakes Way connects to The Pacific Highway at both the north and south extremities. To the north, The Pacific Highway can be also accessed more directly via Failford Rd. The Lakes Way wends through coastal tourist areas including Tuncurry and Forster. Both Failford Rd and The Lakes Way are State Classified Roads, Figure 8.

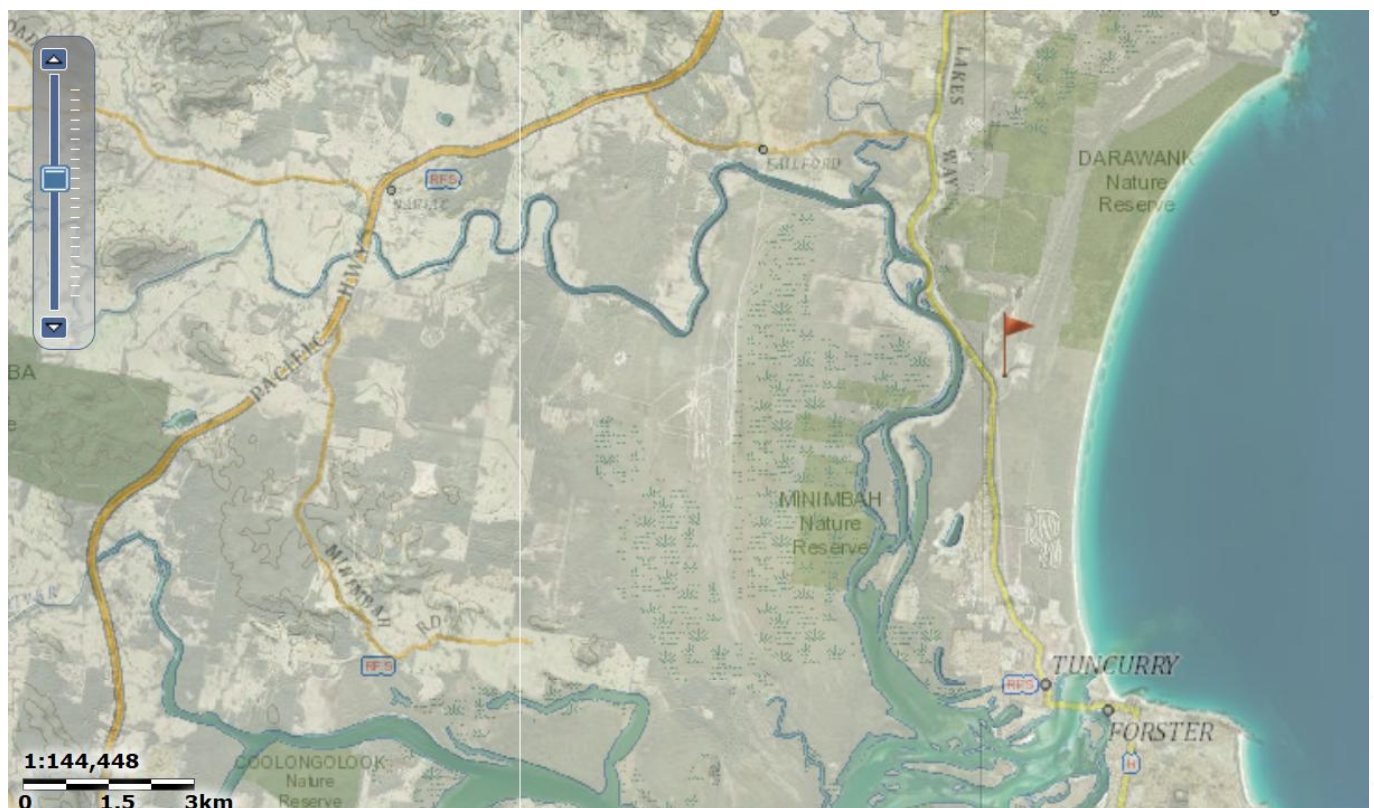
One new driveway would be constructed to enable access for Council trucks, B-Doubles and semi-trailers. 35 heavy vehicles are expected to access the Site daily. The longest vehicle would be a 26m B-double. Backloading would be used to distribute the compost product.

Parking will be provided for staff onsite, with additional provision for disabled parking and visitors.

A public drop off area will be provided, but users will not be able to park. Similarly, trucks accessing the Site will be for deliveries and offtake only. A preliminary layout is provided in Appendix C, showing parking.

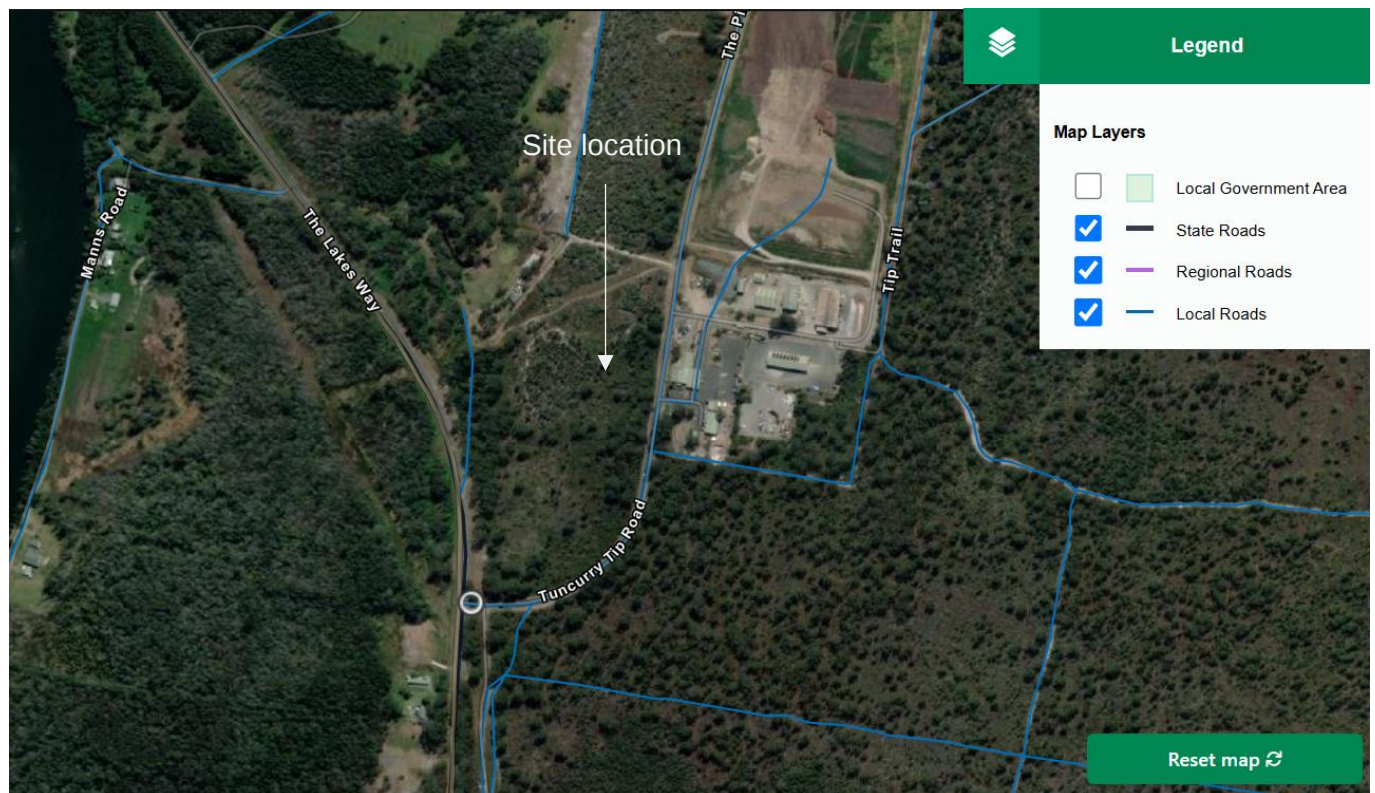
A Traffic Impact Assessment will be provided with the application to assess construction impacts as well as the adequacy of onsite parking and manoeuvring space, and the impact on local roads.

Figure 7: Local Road Network



Source: Six Maps

Figure 8: Road Classification



Source: TfNSW NSW Road Network Classifications

6.6 Air Quality

The overall air quality of the surrounding region is expected to be high, being in a regional location with minimal development nearby. However, the adjacent waste management facility may produce localised air quality impacts including particulates and odour.

Construction works may result in air impacts from the generation of dust and vehicle emissions.

The proposed organics processing facility has the potential to impact air quality from the generation of dust and odour. Impacts are expected to be reduced through the containment of materials handling within the buildings and the use of an air handling system to treat odorous air.

MC ROPS will operate under negative pressure, with the extracted air being treated through an acid and water scrubber, followed by a biofilter, to remove odours and particulate matter before being released into the atmosphere.

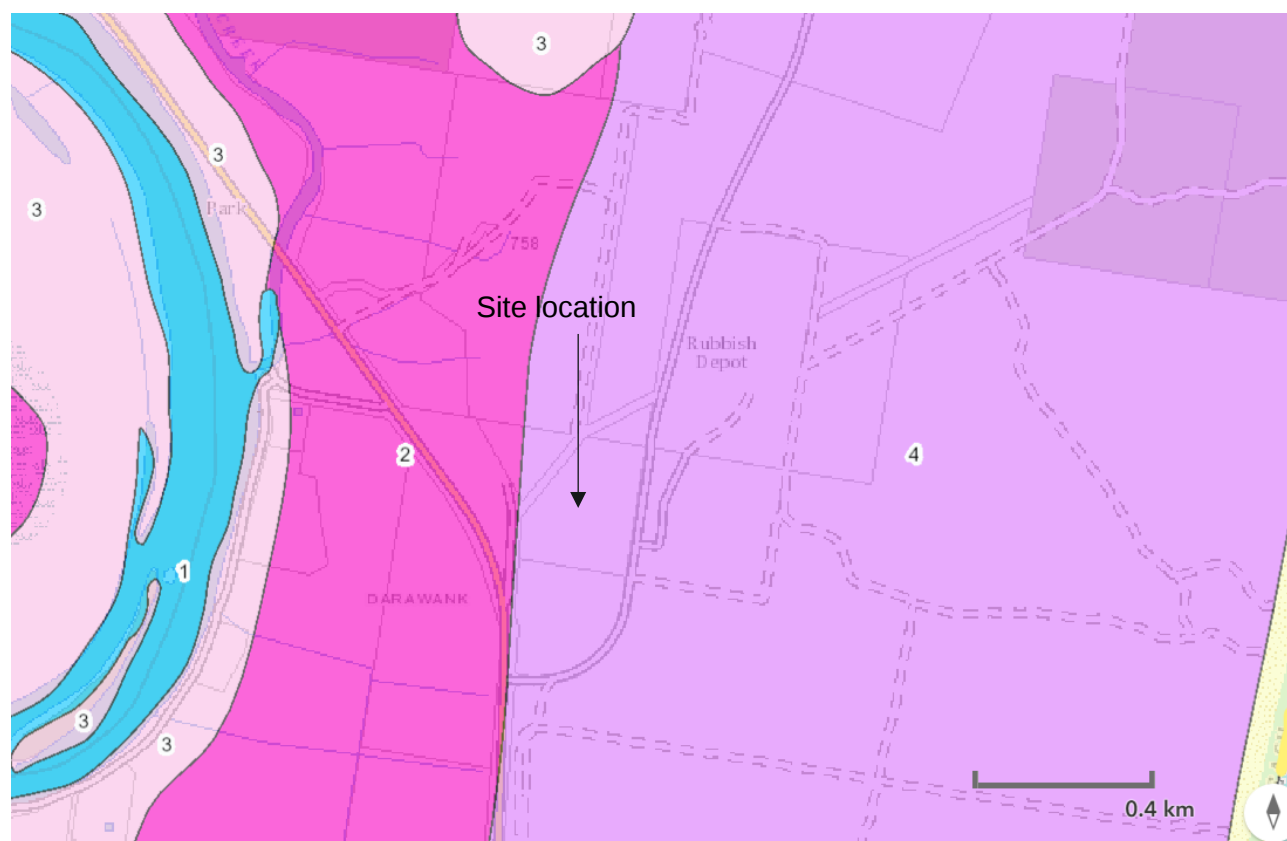
The development application will include an air quality and odour assessment to ensure that air emissions do not exceed the relevant assessment criteria. It would also include a scope 1 and scope 2 greenhouse gas assessment.

6.7 Soils

The Site is affected by L4 – Low probability acid sulfate soils at greater than 3m.

A search of the Contaminated Lands register did not produce any results for the location.

Figure 9: Acid Sulfate Soil Risk



Source: NSW Planning Portal Digital EPI Viewer

The Site is currently undeveloped and requires disturbance of soils for the development to proceed. Standard measures to protect against erosion and sedimentation would be employed during the construction phase.

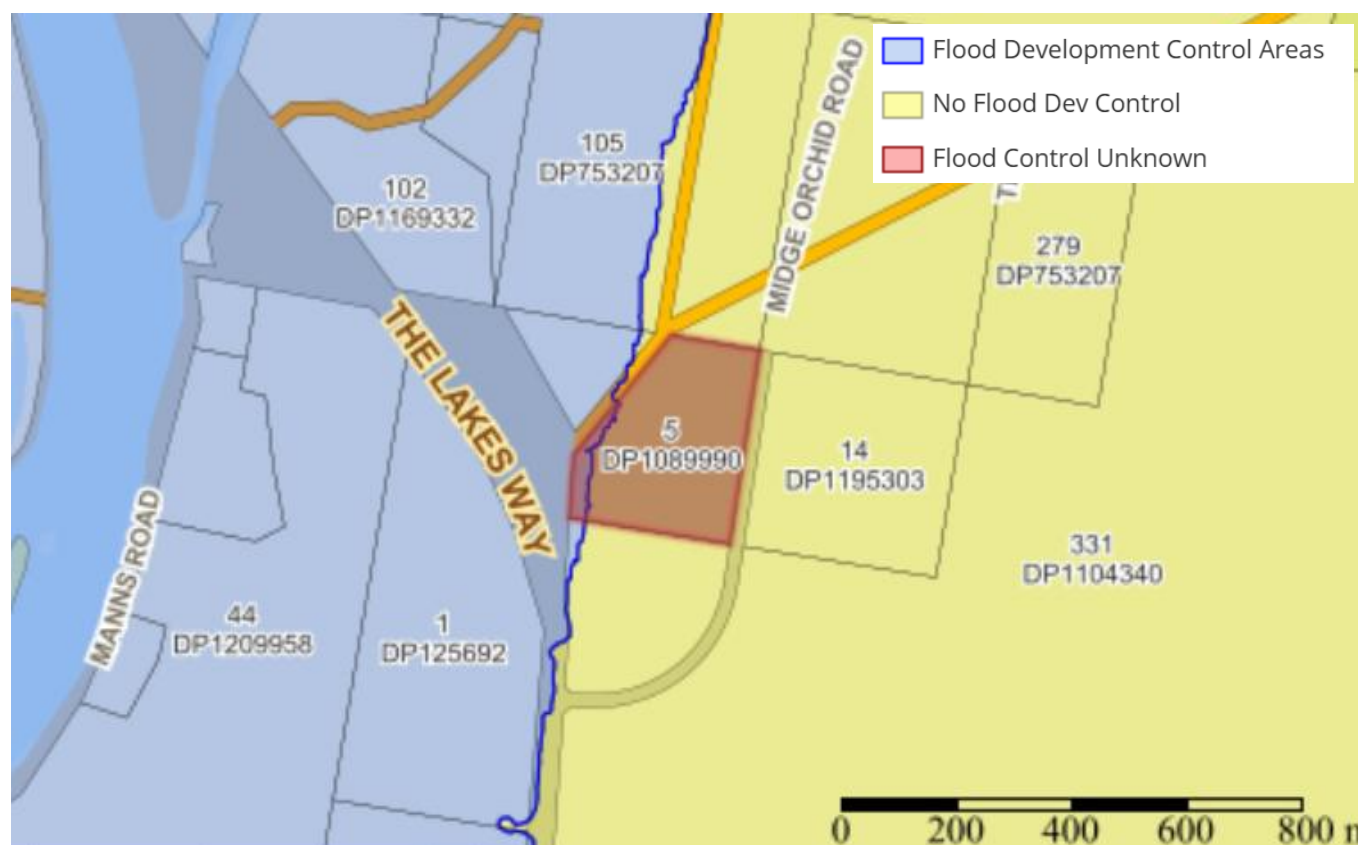
There would be no discharge of sewer, leachate or other contaminated substances to land.

The submission would include preliminary testing of soil characteristics and an erosion and sediment control plan.

6.8 Surface and Ground Water

The Site slopes west, toward the Wallamba River, which is approximately 600m distant. The Site is affected by flooding at the western boundary, as shown on Figure 10.

Figure 10: Flood prone land mapping



Source: MCC Public GIS

NALG would undertake stormwater and drainage works to establish appropriate site infrastructure.

Composting and anaerobic digestion processes would be in enclosed structures and would not discharge to surface or ground water. Leachate would be recycled for use in the digesters and during pasteurisation phase in tunnels. In general, the process requires the use of water. However, if there is excess water that requires disposal, it will be either discharged to sewer post treatment (under a trade waste licence with MidCoast water) or trucked offsite to a lawful facility.

A site water balance will be provided with the development application. The design will include a drainage plan, erosion and sediment control plan, and a water sensitive design strategy. The EIS will describe the potential impacts of the proposal on surface water and the provision of water and sewer services.

The application will include an assessment of flood impact.

6.9 Noise and Vibration

Being in a rural area, existing background noise levels are expected to be low. Noise generated from construction includes the use of equipment and machinery for site works. Noise generated by the activity includes vehicular movements, loading and unloading and reversing beepers, and aeration fans. In general, composting is not considered to be a noisy operation.

The potential for noise disturbance is likely to be low due to the limited noisy operations onsite and distance from the closest receiver. Nevertheless, an acoustic assessment would be prepared for the application that assesses both construction and operational impacts.

Vibration impacts are unlikely as no major vibrational equipment would be needed.

6.10 Visual Amenity

The Site is situated adjacent to an existing waste management centre, which already has low amenity values.

The site will be designed to be both functional and visually amenable. A landscape plan will be included in the submission as well as a visual impact assessment.

6.11 Socio-Economic

The proposed development is expected to have net socio-economic benefit due to jobs creation, the re-use potential of composted FOGO and diversion of materials from landfill.

The Site is appropriately located adjacent to a local landfill.

There would be no impacts to local community or to travel routes.

The EIS would include a minor assessment of the potential socio-economic impacts and benefits of the proposal. This would include:

- a desktop review of relevant secondary data sources
- targeted stakeholder consultation, including with relevant local stakeholders

A full Social Impact Assessment is not deemed necessary.

6.12 Biodiversity

The Site has been previously cleared, but is largely covered with native re-growth vegetation. There are minor areas of clearing at access areas and underneath the existing power lines.

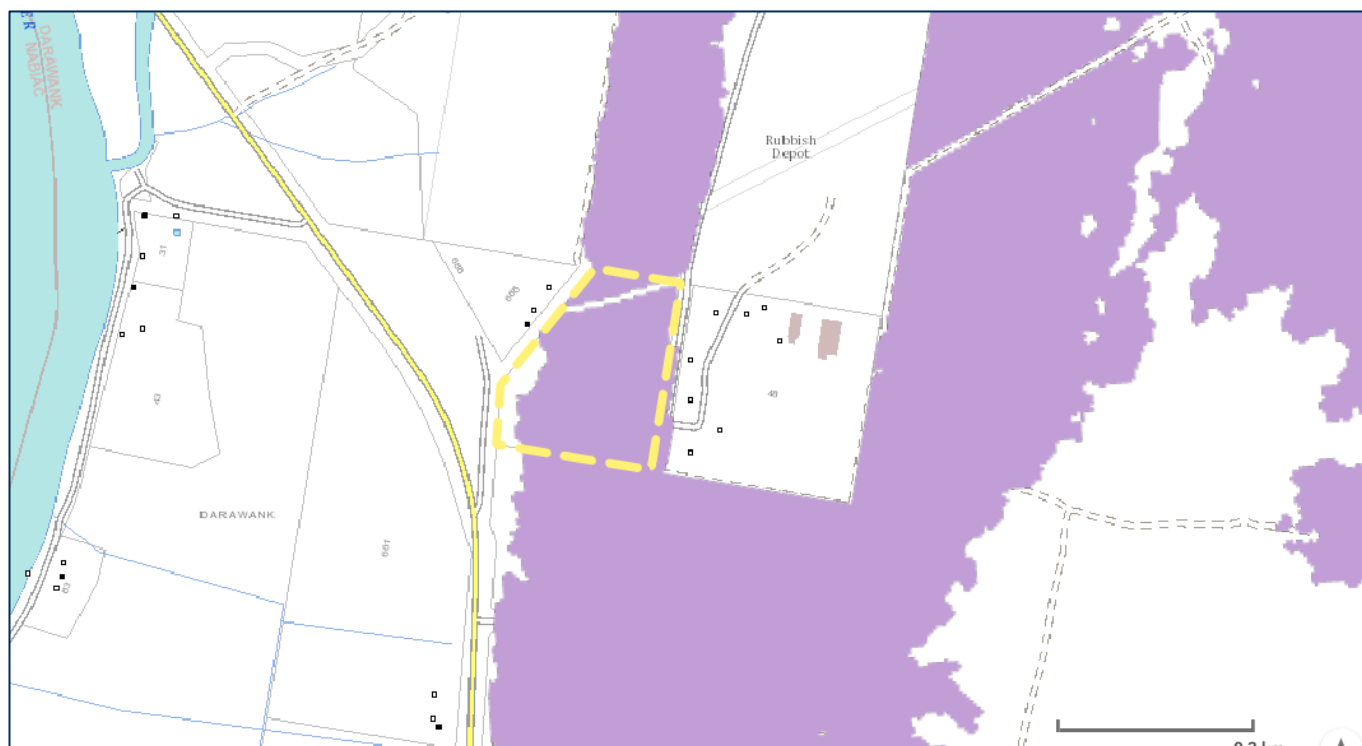
The proposal would require the clearing and levelling of approximately 8,900m² for establishment of hardstand, trafficable areas, weighbridge, buildings, structures, utilities and other site infrastructure.

The Site is mapped on the *Biodiversity Values Map* and as *Sensitive Regulated Land*, as shown in Figure 11 and Figure 12.

The Biodiversity Values Map (BV Map) identifies land with high biodiversity value that is particularly sensitive to impacts from development and clearing. The BV Map is one of the triggers for determining whether the Biodiversity Offset Scheme (BOS) applies to a clearing or development proposal.

Under the *Local Land Services Act 2013* (LLS Act) the clearing of sensitive regulated land is not allowable without authorisation. Authorisation is hence required for the proposed development.

Figure 11: Biodiversity Values Map



Source: Biodiversity Values Map E-planning Spatial Viewer 2025

Figure 12: Regulated Land



Source: Transitional native vegetation regulatory map viewer

A preliminary biodiversity survey has been undertaken by Key Botany on behalf of MidCoast Council. The study is titled: *Targeted Searches for the Critically Endangered Genoplesium littorale (Tuncurry Midge Orchid) Lot 5 DP1089990, Darawank*. The aim of the study was to determine if *Genoplesium littorale* (Tuncurry Midge Orchid) is present on the subject site. The full report is provided in Appendix D and summarised below.

The Site is described as last being cleared in 2001 and characterised by disturbed regrowth native vegetation.

While it was confirmed that the Midge Orchid was in flower, no individuals were detected during targeted searches.

Habitats were mapped as the four types shown on Figure 13.

Figure 13: Habitat types



Source: Key Botany

Eucalyptus pilularis - *Angophora costata* forest occurs on the eastern, southern and western boundary of the subject site. This habitat provides the highest probability of accommodating the Midge Orchid on the Site. Although no individuals were recorded in the survey, the report recommends that second attempt should be undertaken in these patches during flowering times in 2025.

A second survey was undertaken by AEP and was provided as part of a fee proposal for further work. The fee proposal has not been attached, however the results of the survey are provided below, confirming no target species have been identified onsite. Hence no further survey of the Midge Orchid is considered necessary.

Phase 1 - Ecology BDAR – Initial Seasonal Surveys

Due to seasonal time constraints upon initial engagement, surveys for *Genoplesium littorale* (Tuncurry Midge Orchid) were completed by AEP in March 2025. Confirmation of reference population of this species along with discussions with Council Ecologist including AEP identification of flowering within the local reference population which was undertaken prior to completing 5m Flora Transects across the entirety of the Subject Land. No target species was identified on site during these surveys. It is noted that a bushfire had gone through the site approx. 3 years ago.



***Genoplesium littorale* reference population area 17th March 2025.**

Further surveys are being undertaken. A Biodiversity Assessment Report will be provided as part of the application that includes:

- Field surveys to meet the requirements of the Biodiversity Assessment Methodology (BAM);
- The production of a Biodiversity Development Assessment Report (BDAR) including, preliminary EPBC Act Assessment and relevant SEPPS and local legislation; and
- Biodiversity Credit Assessment for the proposal.

6.13 Aboriginal Heritage

An Aboriginal Heritage Information Management System (AHIMS) search was completed by MRA consulting on 3 March 2025.

0 Aboriginal sites are recorded in or near the location.

0 Aboriginal places have been declared in or near the location.

Considering that the land will be disturbed by site works, a preliminary assessment of cultural heritage would be undertaken to determine the need for a full Aboriginal Cultural Heritage Assessment Report (ACHAR). A full ACHAR would be undertaken if required.

6.14 Non-Aboriginal Heritage

A search of the NSW State Heritage Inventory was conducted 12 April for Tuncurry Tip Road, Darawank 2428. The closest place of non-aboriginal heritage is the *Former Darawank Public School*, approximately 800m to the west. The development will not cause impact to this heritage location as the development would not cause disturbance beyond the boundaries of the Site.

Targeted Searches by Key Botany provides a short history of the area:

Historical literature depicts the subject site and wider Tuncurry area with a long history of disturbance from pine plantations and sand mining. Historical accounts held in the Tuncurry Museum talk of a Reafforestation Prison Camp established in 1913 behind the current Tuncurry Waste Management Facility ... (MidCoast stories 2024). Prisoners were tasked with planting out acres of pine trees between 1914 and 1937 (MidCoast stories 2024). No historical imagery could be obtained during this period to confirm the subject site was part of this experiment. However, historical aerial imagery shows the subject site was cleared except for a small strip in the eastern and western boundaries in 1980 (and possibly earlier) and remained cleared until 2001, after which it has slowly regenerated to its current state...

A Cultural Heritage Assessment would be undertaken for the proposed development.

6.15 Hazardous and Risks

Key hazards and risks for the proposal are associated with the operation of the facility and include:

- Management of hazardous chemicals;
- Incidents such as fire, explosions, spills etc;
- Vehicle movements within the site;
- Accidents and safety matters; and
- Medical emergencies.

Key hazards will be addressed through Site management, the implementation of personal safety measures and through the use of physical controls.

A HAZOP (Hazard and Operability) assessment would be undertaken as part of the operational requirements, but not for the application submission.

6.15.1 Fire Hazards

6.15.1.1 Bushfire Prone Land

The Site is mapped as bushfire prone land, as shown in Figure 14.

The development would be assessed within the EIS in accordance with *Planning for Bushfire Protection 2019* and *Addendum to Planning for Bushfire Protection 2022*. A full bushfire study is not considered necessary as the development is not for residential use.

The following objectives are applicable:

- to provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation;
- to provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development;
- to provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building; and
- provide for the storage of hazardous materials away from the hazard wherever possible.

Figure 14: Bush Fire Prone Land Mapping



Source: e-Planning Spatial Viewer

6.15.1.2 Fire Safety in Waste Facilities

NSW Fire and rescue has published the fire safety guideline: *Fire Safety in Waste Facilities*. The guideline *does not* apply to composting and therefore an assessment against this document is not required.

6.15.1.2.1 National Construction Code

The National Construction Code (NCC, formerly Building Code of Australia) provides design requirements for fire safety in the construction of new buildings.

The development will be designed to comply with NCC requirements. A BCA report would be prepared as part of the construction certificate application.

6.15.2 Hazardous goods storage

The proposed operations would require the storage of hazardous or dangerous goods including:

- Diesel
- Acid
- Biogas

Hazardous goods will be stored in a compliant manner. Liquids will be banded. Gases will be stored in a well-ventilated area in gas bladders.

A screening test would be completed in accordance with Applying SEPP 33 (DoP 2011) to determine whether a Preliminary Hazard Analysis (PHA) is required.

6.15.3 Site Management

An Environmental Management Plan would be adopted to identify and manage risks onsite. Operational protocols would address safety and risk, to ensure the workers are adequately trained and provided with a safe work environment. The EMP would be prepared prior to operations commencing, with a summary of contents included in the EIS.

7 Summary

The appropriate planning pathway is as State Significant Development, requiring an Environmental Impact Statement (EIS) to be submitted to the Department of Planning, Housing and Infrastructure for assessment and determination.

The MC ROPS would be established on a vacant lot with minimal land development. Due to proposed changes to the land, assessments associated with clearing and building will be required.

The Site may be associated with native or non-native cultural values, which require investigation prior to lodging the development application.

The use of the Site as a waste management facility has the potential to generate noise, traffic, offensive odour, air emissions, and stormwater discharge. Such matters will be assessed and included as part of the submission.

Further assessments are summarised below. A Scoping Summary Table, sourced from the *Social Impact Assessment Scoping Tool 2017* has been provided in Appendix A.

7.1 Matters requiring further assessment

It is anticipated that a specialised assessment is required for:

- Waste management;
- Traffic impacts;
- Air quality and odour;
- Soils testing and erosion and sediment control;
- Stormwater management and flooding;
- Noise impact;
- Biodiversity assessment;
- Aboriginal heritage assessment;
- Non-aboriginal heritage assessment;

Matters requiring minimal or no further assessment include:

- Midge Orchid surveys;
- Socio-economic impacts;
- Hazardous goods storage;
- Bushfire hazard assessment; and
- Visual amenity.

Appendix A Scoping Summary Table

Social and environmental matters I.e. natural or human assets or values aggregated at the level most appropriate for informing management and assessment requirements <i>Click on the matter for a description, or the link above for full glossary</i>			the proposal likely to impact on the matter? (Select from list)	2. If applicable, list the receptor being impacted and its status. E.g. construction noise will be heard at nearby school If 'unlikely', briefly explain why. Has the impact been actively avoided through project design or site location? (Manual entry)	expected to cause a material effect with regard to its... (Answer 'Y' or 'N') extent? duration? severity? sensitivity?	impact need assessment in the EIS? (Auto fills)	expected to have a material cumulative effect with other impacts (including from other projects)? (Select from list)	measures are expected to be required to address the impact? (Select from list)	stakeholder concerns regarding the impact or activity? (Based on engagement with)	Expected level of assessment and/or engagement required (Auto fills)	Relevant section in Scoping Report (Manual entry)
What does the proposal mean for people?	AMENITY	acoustic	Likely	Construction and operation	N N Y Y	Yes	No	Project Specific	Yes	Key Issue + Focussed Engagement	6.9
		visual	Likely	Built form in a natural environment	N Y N Y	Yes			Yes		6.10
		odour	Likely	odour emissions	Y Y Y Y	Yes	No	Project Specific	Yes	Key Issue + Focussed Engagement	6.6
		microclimate	Unlikely						No	Scoping Report	
	ACCESS	other - please specify	n/a							No assessment necessary - Worksheet only	
		access to property	Likely	Develop access	N N N N	No			No	Scoping Report	6.5
		utilities	Likely	Connect to local utilities	N N N N	No			No	Scoping Report	6.2
		road and rail network	Unlikely	N/A					Yes	Scoping Report + Explain avoidance	6.5
		offsite parking	Unlikely	N/A					No		6.5
		other - please specify	n/a							No assessment necessary - Worksheet only	
	BUILT ENVIRONMENT	public domain	Unlikely	Positive - access to FOGO drop off					Yes	Scoping Report + Explain avoidance	6.10
		public infrastructure	Unlikely	Nil					No	Scoping Report	6.10
		other built assets	Unlikely	Nil					No	Scoping Report	6.2
		other - please specify	n/a							No assessment necessary - Worksheet only	
	HERITAGE	natural	Unlikely	None known					No	Scoping Report	
		cultural	Likely	Potential for cultural heritage onsite	N Y N Y	Yes	No	Standard	No	Other Issue	6.14
		Aboriginal cultural	Likely	Potential for aboriginal cultural heritage onsite	N Y N Y	Yes	No	Standard	No	Other Issue	6.13
		built	Unlikely	New buildings					No	Scoping Report	6.14
	COMMUNITY	other - please specify	n/a							No assessment necessary - Worksheet only	
		health	Unlikely	Limited impact					No	Scoping Report	6.15
		safety	Likely	Limited impact	N N ? ?	Unknown	No	Standard	No	Other Issue	6.15
		services and facilities	Unlikely	Limited impact					No	Scoping Report	
		cohesion, capital and resilience	Unlikely	Limited impact					No	Scoping Report	
		housing	Unlikely	Limited impact					No	Scoping Report	
	ECONOMIC	other - please specify	n/a							No assessment necessary - Worksheet only	
		natural resource use	Unlikely	Positive					No	Scoping Report	6.11
		livelihood	Unlikely	Positive					No	Scoping Report	6.11
		opportunity cost	Unlikely	Positive					No	Scoping Report	3.10
What does the proposal mean for the natural environment?	AIR	other - please specify	n/a							No assessment necessary - Worksheet only	
		particulate matter	Likely	air quality from construction and operations	N Y Y Y	Yes	No	Project Specific	No	Key Issue	6.6
		gases	Likely	GHG and gaseous emissions	Y Y N N	Yes	No	Standard	No	Other Issue	6.6
		atmospheric emissions	Likely	From production of Biogas			No	Project Specific	Yes	Key Issue + Focussed Engagement	6.6
	BIODIVERSITY	other - please specify	n/a							No assessment necessary - Worksheet only	
		native vegetation	Likely	Native plant clearing	N Y N Y	Yes	No	Project Specific	Yes	Key Issue + Focussed Engagement	6.12
		native fauna	Likely	Fauna habitat	N Y N Y	Yes	No	Project Specific	Yes	Key Issue + Focussed Engagement	6.12
		other - please specify	n/a							No assessment necessary - Worksheet only	
	LAND	stability and/or structure	Unlikely	Will be constructed to stabilise land					No	Scoping Report	6.7
		soil chemistry	Unlikely	No change					No	Scoping Report	6.7
		capability	Likely	Capability to support structures	N ? N Y	Unknown			No		6.7
		topography	Unlikely	Minor changes.					No	Scoping Report	6.7
	WATER	other - please specify	n/a							No assessment necessary - Worksheet only	
		water quality	Likely	Change to drainage	Y Y Y Y	Yes	No	Project Specific	No	Key Issue	6.8
		water availability	Unlikely	N/A					No	Scoping Report	6.7
		hydrological flows	Likely	Change to HG flows	N Y ? ?	Unknown	No	Standard	No	Other Issue	6.8
	RISKS	other - please specify	n/a							No assessment necessary - Worksheet only	
		coastal hazards	Unlikely	N/A					No	Scoping Report	
		flood waters	Unlikely	N/A					No	Scoping Report	
		bushfire	Likely	BP land	N N Y N	No			No	Scoping Report	6.15
		undermining	Unlikely	N/A					No	Scoping Report	
		steep slopes	Unlikely	N/A					No	Scoping Report	
		other - please specify	n/a							No assessment necessary - Worksheet only	