

ATTACHMENT 1: RESPONSE TO SUBMISSIONS

AGENCY	SUBMISSION COMMENTS	CATEGORISATION	APPLICANT'S RESPONSE
NSW EPA Advice 6 March 2026	<i>Matters to be addressed prior to determination</i> <i>The EPA is satisfied that it has sufficient information to complete its assessment of the proposal. It is therefore not recommending that any further issues are address prior to determination</i>	PROCEDURAL	The Applicant notes that the EPA has confirmed that there is sufficient information to complete their assessment and no further issues are rebased.
	<i>Matters to be addressed with conditions</i> <u>Noise Impacts</u> <i>In addition to the existing condition within environmental protection licence no.2775, the EPA recommends that the conditions provided in Attachment A be included in the approval.</i>	IMPACTS (Noise)	The Applicant has reviewed the proposed conditions of approval suggested within Attachment A of the EPA's correspondence. While the Applicant is supportive of the suggested noise limits, the monitoring requirements requested in Condition M8 are unreasonable, logistically difficult and an unnecessary to gain an accurate assessment of noise emissions from the project. In this regards, Reverb Acoustics have reviewed the proposed conditions and provide the following comments for DPHI consideration. - Logistically, monitoring at 4 locations over 3 consecutive days is very problematic. - There are no accredited acoustic consultancies based in the Tamworth region, i.e. Reverb Acoustics is based in Newcastle. The long periods of inactivity between each monitoring session would make it unviable for most acoustic firms to accept this project. - Reverb Acoustics has conducted monitoring at the Tangaratta Feed Mill site for more than 20 years and are familiar with all operations. During compliance monitoring for the existing mill, the acoustic consultants are in constant contact with staff in "real time" to determine what activities are occurring at the site. During the trials for 24/7 truck movements this included co-ordinated monitoring to ensure a worst-case situation was being assessed. - Monitoring over 3 consecutive is not necessary, provided that a consultant can co-ordinate with the site to ensure a worst-case situation, as described above is being assessed.

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			- Furthermore, monitoring at the suggested duration (1.5hrs in the day, 30mins in the evening and 1hr at night) at 4 locations would require 12 hours of monitoring plus travel time to be conducted within a single 24 hour period. This monitoring needs to be conducted over 3 consecutive days resulting in a total of 36 hours of monitoring. - Further, the monitoring also need to avoid adverse weather conditions (wind/rain) as required Proposed Condition 6.8, and also align with typical operating conditions at mill. Reverb Acoustics has suggested at much more efficient monitoring programme that will provide the EPA with the necessary data and ensure the mill is operating in the manner as forecast in the EIS. The suggested monitoring program / update to Condition M8 as follows: M8 Requirement to Monitor Noise <i>M8.1 Attended noise monitoring must be undertaken in accordance with Condition L6.5 and must:</i> <i>a) occur at each location specified in Condition L6.1;</i> <i>b) occur:</i> <i>monthly for first 3 months of operation;</i> <i>quarterly for the following 9 months (or until compliance is demonstrated); and</i> <i>subject to demonstrated compliance, biannually thereafter.</i> <i>c) occur during each day, evening and night period (over a single 24 hour period) as defined in the Noise Policy for Industry for:</i> <i>15 - 30 minutes during the day;</i> <i>15 - 30 minutes during the evening; and</i> <i>30 minutes during the night.</i> <i>The acoustic consultant can extend the monitoring duration(s), based on their judgement of impacts from site activities or any other influencing factors.</i>

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			Note: The frequency of noise monitoring in M8.1 may be reduced by the EPA where noise monitoring results demonstrate compliance over a reasonable time period that is representative of seasonal and production variability experienced at the site. The proposed monitoring regime will provide accurate information to the EPA to confirm compliance with the accepted noise levels, while also ensuring that the program does not place an unnecessary burden on the site and acoustic consultants charged with obtaining the necessary data.
	Matters to be addressed with conditions <u>Air Impacts</u> <i>In addition to the existing conditions within environment protection licence 2775, the EPA recommends that the conditions provided in Attachment B be included in the approval.</i>	IMPACTS (Air)	The Applicant accepts the proposed conditions concerning potential air impacts.
	Minor Matters <u>Stormwater Impacts</u> <i>The amendment report and the stormwater management plan provide as Appendix M have largely addressed the issues raised by the EPA in its previous submission dated 5 November 2024.</i> <i>However, modelled water quality performance for the proposed stormwater management system has still been presented in terms of a percentage reduction of key pollutants. This has not enabled the EPA to consider whether water discharge limits are required to provide the applicant with a level of protection from a pollution of waters offence under section 120 of the Protection of the Environment Operations Act 1997 in the event that discharges from the site exceed relevant default criteria within the Australian and New Zealand Guidelines for Fresh Marine Water Quality.</i>	IMPACTS (Stormwater)	The submitted Stormwater Management Plan shows the implementation a series of treatment devices including Gross Pollutant Traps (GPTs) and swales located throughout the site, along with buffer strips along the internal roads. Quality assessment has been undertaken in accordance with WSUD principles and the NSW MUSIC Modelling Guideline (August 2015), which provide the accepted framework for stormwater quality modelling and the application of pollutant reduction targets. The ANZG (2018) water quality guidelines, which suggested for quality objectives, relate to environmental values such as marine and freshwater ecosystems, recreational use, and livestock drinking water. These are ambient water quality criteria for receiving environments, not performance targets for stormwater treatment systems. As such, the ANZG guidelines are not applicable to stormwater quality modelling. The adoption of the MUSIC pollutant reduction targets, consistent with industry practice and the MUSIC Guideline, is therefore considered the appropriate basis for assessing stormwater quality outcomes for this development.

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	<i>The EPA reserves the right to apply a pollution study or program to the licence, should the pollution of water occur, or be appear likely, once the development has been constructed and commissioned. Such a condition will be focused on apply measures to ensure appropriate water quality outcomes are met.</i>		The submitted Stormwater Management Plan demonstrates that the proposed feed mill will operate with no unacceptable stormwater quality impacts on downstream environments. The Applicant will adopt the proposed stormwater management plan and all associated mitigation and management strategies in relation to stormwater quality.
DCCEEW (CPHR) Advice 20 March 2026	<i>CPHR has reviewed the amendment report and amended Biodiversity Development Assessment Report (BDAR) against our recommendations made in response to the project's Environmental Impact Statement (EIS), dated 30 October 2024 (DOC24/827879). The proponent's response and amended BDAR satisfactorily address our recommendations.</i>	IMPACTS (Ecology)	Acceptance of the submitted BDAR is noted.
	<i>CPHR's advice on potential serious and irreversible impact (SAIL) to White Box-Yellow Box-Blakely's Red Gum Grassy Box Woodland and Derived Native Grassland critically endangered ecological community (Box Gum CEEC) is provided in Attachment A. CPHR considers that SAIL is unlikely.</i>	IMPACTS (Ecology)	The Applicant concurs with the findings that the project will not result in any serious and irreversible impact (SAIL) to White Box-Yellow Box-Blakely's Red Gum Grassy Box Woodland and Derived Native Grassland critically endangered ecological community (Box Gum CEEC).
FRNSW 4 March 2026	<i>FRNSW refers to our previous letter dated 22 October 2024, advise on EIS (D24/125099), for Tangaratta Feedmill – 771 Wallamore Road, Wallamore NSW (SSD-58801472). All recommendations made in this letter remain applicable to this project. FRNSW submit no additional comments or recommendations for</i>	IMPACTS (Fire)	The findings of FRNSW are noted and supported. It is noted that there are no comments or recommendations suggested in this advice or FRNSW's previous correspondence dated 22 October 2024.

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	<i>consideration, nor any requirements beyond that specified by applicable legislation at this stage.</i>		
RFS 12 March 2026	<i>The NSW RFS raises no objections/issues subject to the recommendation of the 'Amended Bush Fire Assessment Report' prepared by Integrated Consulting dated 17 December 2025 (revision D) being incorporated within any approval issued for the development.</i>	IMPACTS (Fire)	The findings of RFS are noted and supported.
DCCEW (HERITAGE) 6 March 2026	<i>The Response to Agency Submissions and Amended Aboriginal Cultural Heritage Assessment Report (ACHAR) has provided an updated AHIMS search and the requested consultation documentation. Heritage NSW does note that the AHIMS search is again older than 12 months at time of submission. In future, please ensure that as per Requirement 1b of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010), that AHIMS searches are less than 12 months old at time of submission.</i> <i>The Proposed Amendment Application outlines that Amendment proposal will not have any additional impacts to Aboriginal cultural heritage. Heritage NSW concurs with the conclusions of the ACHAR. Additional information is required on the consultation undertaken in relation to the Amendment proposal. Appendix 1 Figure 12 includes an example letter sent to the Registered Aboriginal Parties (RAPs) regarding the Amendment and states that an updated ACHAR will be supplied soon. Heritage NSW advises Planning requires the applicant provide evidence that this letter was sent to all RAPs and that the revised ACHAR was supplied for comment and</i>	IMPACTS (Cultural Heritage)	Heritage NSW's acceptance of the submitted ACHAR is noted. As noted in the submitted ACHAR, the project update letter was sent to all RAPs on 8 September 2025, which outlined the project changes made following Stage 4 distribution of the ACHAR. The updated ACHAR has now been provided to RAPs for their records. As noted within the project update letter, the updated ACHAR has now been provided to RAPs (see email included as Attachment 2) for their records and does not include an additional review period due to the minor changes made to the project design, which have not resulted in changes to Aboriginal cultural heritage management (noting there are no Aboriginal objects or places identified within, or in the immediate vicinity of, the study area).

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	<i>provide any comments to Heritage NSW to ensure they have been adequately responded to.</i>		
Transport for NSW	<i>TfNSW has reviewed the Response to Submissions (RTS), specifically a technical assessment of the Traffic Impact Assessment prepared by PSA Consulting dated 1 October 2025 and has identified the following matters:</i> <i>Previous matter raised regarding the Oxley Highway / Bowlers Lane / Old Winton Road intersection analysis remain outstanding.</i> <i>TfNSW recommends an intersection analysis in accordance with Austroads Guide to Traffic Management Part 6: Intersections, Interchanges, and Crossings, is required to determine whether an upgrade to the intersection is necessary for capacity and safety reasons.</i>	IMPACTS (Traffic)	As requested by TfNSW, additional analysis of the Oxley Highway / Bowlers Lane / Old Winton Road intersection has been undertaken. An updated Traffic Impact Assessment has been prepared and is included as Attachment 2. With respect The Oxley Highway / Bowlers Lane intersection currently operates without formalised auxiliary turn treatments. Notwithstanding this, the existing pavement is sufficiently wide to allow turning vehicles and through traffic to pass concurrently with minimal delay. Observations and site imagery indicate that: • Vehicles turning left from the Oxley Highway into Bowlers Lane are able to utilise the available pavement width without impeding through traffic. • Right-turning vehicles are similarly accommodated within the existing carriageway. • The intersection is therefore functionally operating as a Basic Right (BAR) and Basic Left (BAL) treatment, despite the absence of formal channelisation. SIDRA intersection analysis of the intersection indicates that, even with the conservative background traffic volumes and the expected traffic generated by the development, the intersection is forecast to maintain its current level of operation (LOS A). All performance factors are projected to operate at or above satisfactory levels. A turn warrant assessment undertaken in accordance with Austroads Guide to Road Design (Part 4) indicates that the intersection satisfies the criteria for: • A Channelised Right-Turn (Short) CHR(S) treatment under 2026 traffic conditions (without development). • A Basic Left-Turn (BAL) treatment under 2026 traffic conditions (without development).

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			• A Channelised Right-Turn (CHR) treatment under 2036 traffic conditions (with development + background growth). • A Basic Left-Turn (BAL) treatment under 2036 traffic conditions (with development + background growth). The proposed development is forecast to generate a minor increase in turning movements at the intersection, including: • AM Peak: 11 additional vehicle trips, including 7 right-turn movements. • PM Peak: 7 additional vehicle trips, including 4 right-turn movements. These increases are negligible in the context of existing and future background traffic volumes. It is also noted that the existing mill on site is currently operational and already using Bowlers Lane as and such, the forecast growth is considered to be conservative as the some of the trips are duplicated in both the background growth and development traffic. Accordingly, the proposed development does not significantly alter intersection performance or safety outcomes. While the turn warrant assessment indicates that a CHR(S)/CHR treatment is warranted, this outcome is primarily driven by background traffic growth, rather than the incremental impact of the proposed development. Overall, the traffic assessment notes that: • The intersection is already operating effectively as a BAR/BAL configuration due to the available pavement width. • The additional development traffic is minimal and does not directly trigger or materially influence the need for turn treatment upgrades. • Traffic distribution assumptions applied in the assessment are conservative. Give that the intersection already warrants a BAL/CHR treatment with or without the development, upgrades are not directly attributable to the

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			project and conditioning upgrades to this intersection would be an unreasonable financial burden on the Applicant. As an alternative, haulage traffic associated with the feed mill can be easily re-directed to avoid this intersection and can utilise the Oxley Highway via the Goddard Lane intersection, which has been upgraded to a fully channelised treatment to service industrial traffic in this location. The Goddard Lane intersection has been previously assessed in the <i>Oakburn Poultry Processing Plant Road Transport Assessment (2019)</i>, prepared by TTPP, which confirmed that the intersection operates with adequate capacity and performance under forecast traffic conditions. As such, the minimal volumes associated with the feed mill operations will not alter performance.
	<i>All other matters identified in Annexure A of the TfNSW letter dated 5 November 2024 have been addressed in the Response to Agency Submission (dated 6 February 2026) and the Amendment Report and relevant appendices, to the satisfaction of UGLRL.</i> <i>It is noted that Tangaratta Stockfeeds Pty Limited (the Applicant) is currently in discussions with UGLRL to obtain an access licence for the existing driveway and crossings, and to formalise a licence agreement.</i>	IMPACTS (Traffic)	Noted. The Applicant is currently in negotiations with UGLRL to obtain an access licence for the existing driveway and crossings, and to formalise a licence agreement.
CASA 2 April 2026	<i>CASA does not object to the proposed Development / Poultry Feedmill. No further information is required.</i> <i>The only recommendation(s) would be along the lines:</i> <i>The system should be 'sealed' as far as practicable so that bird feed is not available to 'opportunistic' birds.</i>	IMPACTS (Airport)	Due to proximity of the airport, CASA have assessed the project against the National Airports Safeguarding Framework (NASF) Guidelines as a checklist. The assessment concludes that there are no objections with the project and no further information is required. The suggestion to seal the mill as far as practicable is consistent with the proposed approach to management of dust and noise emissions, as well as vermin control and has been adopted by the project.

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	<i>As with all developments in the area, it is recommended that the Airport Manager be advised of the development proposal and consider whether it is worthwhile evaluating the proposal with respect to the Wildlife Hazard Management Procedures.</i>		The Airport Manager (Tamworth Regional Council) has been advised of the project and raised no issues with respect to wildlife management.
Tamworth Airport 26 March 2026	<i>No concerns raised.</i>	IMPACTS (Airport)	The response notes that the stack height has been increased from 36.615m to 44.198m above ground level. However the Regional Airport OLS height for Inner Horizontal Surface is 444.50 metres AHD, and the proposed stack height is below this level by 21.3m. As such, no further assessment is required.
Air Services Australia (via DPHI) 31 March 2026	PSA was advised by DPHI that Airservices Australia had no comments other than that any crane(s) in the area required during construction will also need separate assessment.	IMPACTS (Airport)	Noted. The Applicant understands that the use of cranes during construction will require further assessment.
Tamworth Regional Council 18 March 2026	Production Capacity: <i>Upon review of the EIS, it is noted that the cumulative production capacity has been reduced from 17,500T per week under the original proposal to 16,200T per week, representing a reduction of 1,300 tonnes per week. Under the amended proposal, the existing mill is to operate at a production capacity of 2,200 tonnes per week, while the new mill will have a production capacity of 14,000 tonnes per week.</i> <i>However, Council notes that under Development Consent DA2000/428, the existing mill is currently approved to operate at a production capacity of 10,000 tonnes per week. In order to ensure consistency between the historical consent and the production levels now proposed under the current application, it is recommended that a condition of</i>	PROCEDURAL	As noted above in section 1.4 of the Amended EIS, the existing mill will receive continue to operate under its current approvals and Environmental Protection License (EPL) during the day and evening periods (7am to 10pm) with a capped production level of 2,200 T per week. Subject to approval of this application a Modification Application and Variation to the EPL will be sought to introduce this limit to the current approval regime. This will be undertaken prior to commencement of operations at the new mill and can be conditioned accordingly.

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	<i>consent be imposed requiring the lodgement of a modification application to formally reduce the approved production capacity of the existing mill. This will ensure alignment with the proposed production levels and hours of operation under the current approval.</i>		
	Proximity to Airport <i>Section 2.5.6 of the Amendment Report states that the proposed feed mill will have a maximum stack height of 36.615 m and will not exceed the 45 m Obstacle Height Limitation (OHL). While it is acknowledged that the applicable OHL is 45 m, the amended plans indicate that the maximum stack height has been increased to 44.198 m. This differs from the previously stated maximum height of 36.615 m and presents an inconsistency within the documentation.</i> <i>Given that the revised maximum stack height is now only marginally below the 45 m OHL, to ensure the safety of aircraft operations near the proposed facility, it is recommended that the application be re referred to Airservices Australia (ASA), the Civil Aviation Safety Authority (CASA), and the Manager of Tamworth Regional Airport for their feedback. Furthermore, it is also recommended that any forthcoming consent includes a condition requiring the Proponent to confirm the final stack height is constructed below the 45m height maximum.</i>	IMPACTS (Airport)	The stack will be constructed with a maximum height of 44.198m above ground level as shown on the approved plans. As noted above, the Airport Manager has confirmed that the stack is 21.3m the OLS and is supportive of the project. Similarly, CASA and ASA have not raised any additional concerns.
Department of Primary Industries and	<i>As a result of this amendment, other key aspects of the project are reduced daily heavy transport movements, fewer silos, changes in the hours of operation for the existing mill, and increased</i>	IMPACTS (Biosecurity)	The comments from the DPIRD with respect to bio-security and ongoing consultation with adjoining landholders throughout all stages of the proposed development are noted.

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Regional Development	<i>height in mill stacks from 36m to 44m. The change in this arrangement and site output is not clearly explained in the supporting documents.</i> <i>The report replicated information provided in the Biosecurity and Land Use Conflict Risk Assessment (LUCRA) reports provided with the EIS to identify potential risks of the project to surrounding land and proposed mitigations.</i> <i>Our previous advice provided 25 October 2024 (OUT24/16682) requested further information from the applicant concerning a permanent vehicle disinfection/wash station being installed as a biosecurity measure and advice on the use of renewable energy on the site. Our review of the Biosecurity Checklist provided with the Report provides for full truck sanitation for feed deliveries on a weekly basis, and there is reference to equipment taken into production areas being disinfected but no references to an automated wash station as suggested. However, we note that Amended Appendix V3 does refer to washing and disinfecting equipment and trucks. In relation to renewable energy, we note the narrative around sustainability and the investment by the applicant in various renewable process to offset energy consumption.</i> <i>In relation to the LUCRA, we reinforce the need for ongoing consultation being established with adjoining landholders during all phases of the project to assist with the performance management of the site during construction and operation.</i>		The use of the truck will be adopted for the project as identified in Amended EIS. The various operational and bio-security management plans will also be updated following approval to incorporate all measures and reflect any additional conditions of approval.