

# COMMUNITY ANALYSIS REPORT

## MidCoast Regional Organics Processing Facility

SSD-84090218 | 48 Midge Orchid Road, Darawank NSW 2428

Prepared by: Darawank Residents | March 2026

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### Purpose of This Report

This report presents an independent analysis of documents filed by NALG Envirotech Pty Ltd and its consultants in support of the proposed MidCoast Regional Organics Processing Facility. It has been prepared by affected residents of Darawank to inform a formal community objection to the application.

The analysis identifies significant concerns with the applicant's own documentation, including misleading representations of impact, inadequate assessment methodologies, and fundamental planning conflicts that the Department of Planning must consider before any determination is made.

**Exhibition closes: 19 March 2026. This report supports submissions lodged on the NSW Planning Portal.**

# 1. Executive Summary

The proposed MidCoast Regional Organics Processing Facility (MC ROPS) is a \$56 million, 146,000-tonne-per-annum industrial composting facility proposed by NALG Envirotech Pty Ltd on behalf of MidCoast Council. The site is located at 48 Midge Orchid Road, Darawank, in immediate proximity to established residential properties.

A thorough review of the applicant's own documentation — including the SEARs Scoping Report, Air Quality Impact Assessment, and Acoustical Report — reveals a pattern of underestimated impacts, selective methodology, and inadequate community engagement. The residents of Darawank submit that the proposal, in its current form, should not be approved.

Key concerns are summarised below and detailed in subsequent sections of this report:

Ground of Objection	Key Finding
<b>Procedural — Inadequate Exhibition</b>	Notification letter arrived as late as 3 March; effective response window was only 12 business days for a 47-page EIS plus technical reports.
<b>Planning — Zoning Conflict</b>	The site is zoned RU2 Rural Landscape. A waste management facility is explicitly not permissible under the LEP. State override via SEPP circumvents local planning protection.
<b>Proximity to Residents</b>	The closest receiver (R5, 661 The Lakes Way) is only 85 metres boundary-to-boundary. A Council-owned residence 20m from the facility is being demolished to remove it as a sensitive receptor.
<b>Scale Inflated for Commercial Gain</b>	NALG's own documents reveal the facility was scaled from 99,000 to 146,000 tpa not for community need, but to 'create enhanced revenue-generating potential'.
<b>24/7 Industrial Operations</b>	The facility operates 24 hours, 7 days a week including all truck deliveries and offtake. This was not disclosed in the notification letter to residents.
<b>Odour — Methodology Flaws</b>	The most lenient possible NSW standard (7 OU) is applied. Meteorological data is from 26.5km away. Industrial feedstocks (paunch, offal, grease traps) not fully characterised. No post-approval monitoring recommended.
<b>Noise — Critical Assumptions</b>	Night compliance relies entirely on roller doors being closed — an operational behaviour, not a design safeguard. Monitoring conducted only in winter over 11 days.
<b>Traffic — Unverified Night Movements</b>	Night truck movements assumed at just 20 vehicles based on NALG's own advice, despite

	24/7 operations with no legal restriction on delivery times.
<b>Social Impact Dismissed</b>	The applicant states no full Social Impact Assessment is needed, and claims there will be 'no impacts to local community.' Property value and amenity impacts are not assessed.
<b>Biodiversity — Unresolved</b>	The critically endangered Tuncurry Midge Orchid has unresolved survey requirements. The site is on the Biodiversity Values Map and Sensitive Regulated Land.

## 2. Project Overview

The following facts about the proposed facility are drawn directly from the applicant's own documentation.

<b>Application Reference</b>	SSD-84090218 — State Significant Development
<b>Applicant</b>	NALG Envirotech Pty Ltd (ABN 27 662 479 549), Bella Vista NSW
<b>On behalf of</b>	MidCoast Council
<b>Site Address</b>	48 Midge Orchid Road (Lot 5 DP 1089990), Darawank NSW 2428
<b>Site Zoning</b>	RU2 — Rural Landscape (waste facility is NOT permissible under local LEP)
<b>Processing Capacity</b>	146,000 tonnes per annum
<b>Feedstocks</b>	Council FOGO (95,000 tpa), commercial/industrial paunch and offal (16,000 tpa), agricultural residues incl. poultry manure (15,000 tpa), restaurant grease traps and expired food (20,000 tpa)
<b>Capital Investment</b>	\$56 million
<b>Operating Hours</b>	24 hours per day, 7 days per week — all operations including truck deliveries and offtake
<b>Heavy Vehicle Movements</b>	35 inbound + 17 outbound = 52 movements per day (B-doubles and semi-trailers)
<b>Facility Design Life</b>	30 years minimum
<b>Closest Sensitive Receptor</b>	R5: 661 The Lakes Way — 430m from facility; 85m boundary-to-boundary
<b>Demolished Council Residence</b>	A Council-owned residence at approximately 20m west of the facility will be demolished before works commence
<b>Assessing Authority</b>	NSW Department of Planning, Housing and Infrastructure — Minister for Planning
<b>Exhibition Period</b>	20 February 2026 to 19 March 2026 (28 days)
<b>EIS Prepared By</b>	MRA Consulting Group on behalf of NALG

## 3. Procedural Concerns — Inadequate Exhibition Period

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### 3.1 Late Notification

The Council's notification letter is dated 18 February 2026 — two days before the exhibition period opened. However, the letter was addressed to the closest residential receiver (661 The Lakes Way) and other nearby properties, many of whom did not receive it until 3 March 2026 due to mail being directed to PO boxes rather than house letterboxes.

This effectively reduced the usable response window to approximately 12 business days — for a development supported by a 47-page EIS, a 60-page Air Quality Assessment, and a 66-page Acoustical Report, plus additional technical appendices. This is wholly inadequate for a \$56 million, 30-year industrial facility.

### 3.2 Complexity of Documentation

The full EIS package for this State Significant Development requires residents to review and seek professional advice on complex acoustic modelling, air dispersion modelling, biodiversity assessment, flood impact assessment, and traffic analysis — all within a compressed timeframe. The NSW planning system's own principles require that community members have a genuine and meaningful opportunity to participate. That standard has not been met here.

#### Objection Ground

We formally request an extension of the exhibition period of no less than 30 additional days from 19 March 2026 to allow residents adequate time to obtain independent expert advice and prepare substantive submissions.

## 4. Planning and Zoning

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### 4.1 Fundamental Zoning Conflict

The site is zoned RU2 — Rural Landscape under the Great Lakes Local Environmental Plan 2014. The applicant's own scoping report explicitly acknowledges that 'a Waste Management Facility is not permissible in RU2 zoning under the LEP.'

The applicant circumvents this prohibition by invoking State Environmental Planning Policy (Transport and Infrastructure) 2021, Division 23, which allows waste management facilities as State significant infrastructure regardless of local zoning. While this is technically permissible, it results in the imposition of heavy industrial activity in a zone specifically designated to protect rural landscape and residential amenity. The community's reasonable expectation of protection under the local planning regime is overridden by a State instrument.

The Department must carefully weigh whether this override is appropriate in a locality that is characterised by conservation zones, scattered rural residential dwellings, and proximity to Nine Mile Beach and the Wallamba River.

### 4.2 Scale Inflated for Commercial Reasons

The SEARs Scoping Report (Section 3.10.3) reveals that NALG initially considered a capacity of 99,000 tpa — which would have avoided the State Significant Development classification entirely and would have been subject to normal development consent processes, including local planning controls.

The report states the capacity was increased to 146,000 tpa because it 'creates enhanced revenue-generating potential.' The community is therefore being asked to host a significantly larger industrial facility — specifically designed to exceed the SSD threshold — for the applicant's financial benefit, not out of genuine community or environmental necessity.

### 4.3 No Genuine Alternatives Analysis

The SEARs Scoping Report dismisses alternative locations with a single sentence: 'The Site is offered under a lease agreement by MidCoast Council. There is hence no other likely alternative.' This is not a genuine assessment of alternative locations — it is circular reasoning that starts and ends with the applicant's commercial arrangement. No analysis of other possible sites within the MidCoast LGA was conducted, and no consideration was given to sites that are more appropriately separated from residential areas.

### 4.4 Council Demolishing a Residence to Remove a Sensitive Receptor

The documents reveal that a Council-owned residential property located approximately 20 metres west of the proposed facility will have its lease terminated and the property demolished. The acoustic assessment explicitly excludes this property because it 'will be demolished.'

**Critical Concern**

MidCoast Council is simultaneously the proponent of this development and the owner of a residential property so close to the facility that it must be demolished to enable the development to proceed. This raises serious questions about Council's independence and its duty to represent the interests of all residents, not just the commercial interests of the FOGO processing contract.

## 5. Odour and Air Quality

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The Air Quality Impact Assessment was prepared by Todoroski Air Sciences Pty Ltd on behalf of NALG (January 2026). The assessment concludes that odour levels at all five receptor locations will comply with applicable criteria. However, a critical review reveals serious methodological flaws that undermine confidence in these conclusions.

### 5.1 Most Lenient Standard Applied

The NSW EPA odour criteria range from 2 OU (odour units) for dense urban areas to 7 OU for a single rural residence of 1-2 people. The report applies the maximum 7 OU criterion to every residential receptor, including properties where multiple residents live. This is the least stringent standard available under NSW EPA guidelines and flatters the applicant's case considerably. Given the number of properties and the rural residential character of the area, a criterion of 4-5 OU would be more appropriate.

### 5.2 Meteorological Data from 26.5km Away

All air dispersion modelling is based on data from the Bureau of Meteorology station at Taree Airport — located 26.5 kilometres north of the site. No on-site meteorological monitoring was conducted. The site is in a coastal location near the Wallamba River and Nine Mile Beach, where local sea breezes, land breezes, and terrain effects create wind patterns that the Taree Airport data may not capture. This is a material methodological deficiency.

### 5.3 Industrial Feedstocks Inadequately Characterised

The facility will accept paunch (abattoir stomach contents), dissolved air flotation residue, offal, grease trap waste, poultry manure, and shed cleanout material. These are among the most malodorous organic waste streams in the industry. The odour emission rates used in the modelling are drawn primarily from green waste composting studies and a 2015 research paper. They do not specifically address the odour profile of industrial food waste and agricultural residues that will make up a significant portion of the facility's feedstock.

### 5.4 No Biofilter Failure Scenario

The SEARs specifically required worst-case emission scenarios and sensitivity analysis. The modelling assumes the biofilter operates at 500 OU maximum concentration at all times. No scenario is modelled for biofilter underperformance, maintenance downtime, failure, or bypass. Biofilters are a known point of operational vulnerability — they require consistent moisture, temperature, and biological activity. Any disruption can cause significant odour breakthrough, yet this is not modelled.

### 5.5 No Post-Approval Monitoring at Receptors

The report concludes that 'there are no specific ambient air quality monitoring recommendations for the Project at the receptors.' This means that if odour becomes a serious problem after the facility is operational, there will be no baseline monitoring data, no enforceable trigger point, and no scientific record to support complaints by residents. The Department should require comprehensive air quality monitoring at all identified sensitive receptors as a condition of any approval.

### **5.6 Cumulative Assessment Based on Different Facility**

The cumulative impact assessment for the adjacent Tuncurry Waste Management Centre uses odour emission data from the Albury Waste Management Centre — a completely different facility in a different climate and geography. This substitution is scientifically unjustifiable given the significance of the cumulative impact calculation.

## 6. Noise

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The Acoustical Report was prepared by Koikas Acoustics Pty Ltd for NALG (January 2026). The report concludes that all noise criteria are met at all residential receivers. However, several critical assumptions and limitations undermine confidence in these findings.

### 6.1 The Closest Property Was Removed from the Assessment

As noted above, the residence at approximately 20 metres west of the facility has been excluded from the noise assessment entirely because it will be demolished. The acoustic consultants were never required to model noise at a property 20 metres from the facility. Had they done so, the results may have fundamentally altered the assessment outcome.

### 6.2 Night Compliance Requires Roller Doors to Be Closed

The report's compliance with night noise objectives is entirely contingent on roller doors for all buildings being closed during night operations. This is an operational behaviour, not an inherent engineering design feature. There is no automatic mechanical interlock, no monitoring system, and no proposed enforcement mechanism to ensure roller doors are kept closed at all times during the night period. Any departure from this operational assumption — whether accidental or for operational necessity — means the facility would exceed its noise objectives at residential receivers.

### 6.3 24/7 Truck Movements Assumed Based on Applicant's Own Advice

The traffic noise assessment assumes all 52 truck movements occur between 7am and 5pm — on the basis of 'data provided to Koikas Acoustics by NALG.' The facility explicitly operates 24/7 with no legal restriction on when trucks may arrive. Night movements were assessed at a maximum of 20 trucks, again on NALG's own advice. This self-serving assumption has no independent verification and is not supported by any operational condition or consent requirement.

B-doubles, semi-trailers, and Council trucks serving an abattoir waste and food waste facility operate to their own logistics requirements. It is unrealistic to assume that 52 daily movements will be self-restricted to a 10-hour daytime window when the facility accepts deliveries 24 hours a day.

### 6.4 Monitoring Conducted in Winter Over 11 Days

Background noise monitoring was conducted from 1 to 11 July 2025 — a winter period in which school holidays also commenced mid-survey. Summer is when residents use their outdoor areas most, when windows are open, and when noise sensitivity is greatest. A 30-year industrial facility should have its noise impacts assessed against representative conditions across multiple seasons. Eleven days in winter is inadequate.

### 6.5 Sound Data From Generic Database, Not Site Measurements

The noise levels attributed to the proposed plant and equipment are sourced from 'previous similar assessments and measurements conducted by Koikas Acoustics' — not from direct measurement of the proposed equipment. The accuracy of the modelling depends entirely on the relevance of that generic data to this specific installation.

## **6.6 The Hills at 661 The Lakes Way Penalised for Existing Noise**

661 The Lakes Way (the property closest to the facility's access road) already experiences high traffic noise. The noise assessment exploits this fact to apply a more lenient noise criterion to this property — because existing noise already exceeds the base standard, the development is only required not to add more than 2 dB. The residents who are most affected receive the weakest protections.

## 7. Traffic and Road Safety

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The facility proposes 52 daily heavy vehicle movements (B-doubles and semi-trailers) accessing the site via Midge Orchid Road — a local road that joins The Lakes Way approximately 660 metres from the site entrance. There is no alternative access route.

The following concerns have not been adequately addressed in the applicant's documentation:

- All heavy vehicle traffic must use The Lakes Way, a State Road that also serves as the tourist access corridor for Tuncurry, Forster, and coastal areas. The safety and amenity impacts on this road are not fully assessed.
- The facility operates 24/7 with no legal restriction on delivery times. The acoustic assessment's assumption that all trucks will voluntarily restrict to 7am-5pm has no legal basis.
- The road geometry and infrastructure of Midge Orchid Road has not been independently assessed for its suitability to carry 52 B-double and semi-trailer movements per day over a 30-year operating period.
- The traffic impact on 661 The Lakes Way, which directly adjoins The Lakes Way, has not been assessed for the 24/7 scenario.

## 8. Social Impact

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### 8.1 Social Impact Assessment Dismissed

The SEARs Scoping Report (Section 6.11) states: 'A full Social Impact Assessment is not deemed necessary.' It further claims: 'There would be no impacts to local community or to travel routes.' This is an extraordinary claim for a \$56 million, 24/7 industrial facility proposed for a rural residential environment — and it is directly contradicted by the documented concerns of the residents who live there.

The impacts on residential amenity, property values, health and wellbeing, and community character are real and significant. The dismissal of a full Social Impact Assessment represents a serious failure of the EIS process.

### 8.2 Property Values

Industrial composting facilities — particularly those accepting abattoir waste, grease traps, and agricultural residues — are widely recognised as having negative impacts on the value of nearby residential properties. No assessment of property value impact has been conducted. Residents who have invested in this area as a place to live are entitled to know the likely impact on the value of their most significant asset.

### 8.3 Community Character

The Darawank locality is characterised by conservation zones, rural residential properties, and proximity to the Wallamba River and Nine Mile Beach. The introduction of a 24/7 industrial waste processing facility fundamentally changes the character of this environment for current and future residents.

## 9. Biodiversity

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### 9.1 Critically Endangered Species

The proposed site is adjacent to Midge Orchid Road — named after the Tuncurry Midge Orchid (*Genoplesium littorale*), a Critically Endangered species under the Biodiversity Conservation Act 2016. A targeted survey was conducted by Key Botany on behalf of MidCoast Council. While no individuals were detected, the report recommended a second survey in areas of highest habitat suitability during the 2025 flowering season.

A second survey was conducted, but the full results were not provided in the development application — only a summary in a fee proposal document. The report then concludes 'no further survey of the Midge Orchid is considered necessary.' This is inadequate due diligence for a Critically Endangered species on a site that is being permanently converted to industrial use.

### 9.2 Biodiversity Values Map and Sensitive Regulated Land

The site is mapped on the NSW Biodiversity Values Map and classified as Sensitive Regulated Land under the Local Land Services Act 2013. Clearing of sensitive regulated land requires authorisation. The EIS must demonstrate full compliance with the Biodiversity Offset Scheme and the Biodiversity Assessment Methodology, including a complete Biodiversity Development Assessment Report.

### 9.3 Flood Prone Land

The western boundary of the site is flood prone, draining toward the Wallamba River approximately 600 metres away. The permanent conversion of this land to industrial use, with associated hardstand, leachate management, and stormwater infrastructure, creates a risk of contaminated runoff reaching this environmentally sensitive waterway.

## 10. Conclusions and Recommendations

Based on a thorough review of the applicant's own documentation, the residents of Darawank submit that the proposed MidCoast Regional Organics Processing Facility, in its current form, should not be approved. The grounds for this position are summarised as follows:

1	The exhibition period is procedurally inadequate. An extension of at least 30 days should be granted.
2	The site's RU2 zoning is fundamentally incompatible with the proposed use. The State SEPP override circumvents local planning protections without justification.
3	No genuine alternatives analysis was conducted. The dismissal of alternative sites based solely on Council's ownership of this parcel is not acceptable.
4	The scale of the facility was deliberately inflated beyond community need for commercial reasons. The original 99,000 tpa design should be reconsidered.
5	The demolition of the Council-owned residence 20m from the site to remove it as a sensitive receptor raises serious questions of probity and conflicts of interest.
6	The odour assessment is based on the most lenient possible standard, uses meteorological data from 26.5km away, and fails to model biofilter failure or characterise industrial feedstock odours adequately.
7	The noise assessment relies on an unenforceable operational assumption (roller doors closed at night) and self-reported truck movement data from the applicant. It was conducted over just 11 days in winter.
8	No post-approval monitoring of air quality or noise is recommended at residential receptors. This must be rectified as a condition of any approval.
9	No Social Impact Assessment has been conducted. The impacts on property values, amenity, and community character must be independently assessed.
10	Biodiversity obligations — including the critically endangered Tuncurry Midge Orchid and Biodiversity Offset Scheme requirements — have not been fully discharged.

### Primary Request

The residents of Darawank formally request that the Department of Planning, Housing and Infrastructure reject this development application in its current form, or in the alternative, require substantial redesign, independent re-assessment of all technical reports, mandatory air quality and noise monitoring at all residential receptors, and a full Social Impact Assessment before any determination is made.

### Prepared by:

The residents of Darawank, March 2026

Including: Dr Phil Bos & Nicole Lazarou (131 Manns Road), Ray & Sue Hill (661 The Lakes Way), Drew Hakin, Robert Craig, and other affected residents

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