



Loop Organics Pty Ltd
6/65 Queen Street (PO Box 259), Berry NSW 2535
Ph: 02 4464 1800
ABN: 59 160 028 026

NSW Department of Planning and Environment

Major Projects

19/05/2026

Dear Sir/Madam,

We are writing in reference to **SSD-9418-Mod 3 Ravensworth Composting Facility Expansion-Mod-3**.

Summary:

- Loop Organics considers that there is insufficient odour data to adequately justify that the Modification 3 proposal will not result in an unacceptable increase in odour to the surrounding community.
- Mitigation measures proposed should be revised to take into account the impact of proposed changes in Modification 2 and odour generated from the leachate dam.

Details:

Loop Organics Pty Ltd also operates a composting facility at 74 Lemington Road Ravensworth. We currently accept up to 55,000 tonnes per annum of organic waste material for compost processing and currently have an application with Singleton Council to expand our processing capacity to 95,000 tonnes per annum.

Loop Organics fully supports the concept of open windrow processing of Food Organics and Garden Organics (FOGO) materials to create compost and promote a circular economy for organic wastes in New South Wales. However, we have examined the Modification 3 report and have the following comments:

1. The Specific Odour Emission Rate (SOER) odour used for the site modelling is not representative of the proposed or current site processing conditions or the range of products which are proposed to be processed by Bettergrow.
2. According to Bettergrow Modification 3 Report, wastes which will be composted on site include biosolids (for processing and storage), animal waste (paunch), food waste, including commercial food waste, garden organics, paper crumble and natural organic fibrous material. However, the actual combination of these materials and their relative contribution to odour is not detailed in the odour study report.
3. Data used in the odour study includes:



Loop Organics Pty Ltd
6/65 Queen Street (PO Box 259), Berry NSW 2535
Ph: 02 4464 1800
ABN: 59 160 028 026

- Historical site data from their Advanced Environmental Dynamics, 2019 report, where only biosolids and garden organics were composted on site,
 - Data from a facility which uses tunnel processing (Valoriza facility in Dandenong, Vic) to process FOGO- not open windrow composting (Ektimo, 2025)
 - Literature data for FOGO processing but not data for other organic wastes (Todoroski Air Sciences, 2025a and 2025b).
4. We believe that the data used in the Bettergrow Odour Modelling report needs further consideration including using updated site-specific data and relevant SOER data for all sources of waste proposed to be processed on site.
 5. SOER data should also include site specific odour emissions data for the leachate dam, which has not been previously measured at the Bettergrow Facility.
 6. A conservative estimate has been made of cumulative odour emissions data using estimates of Loop Organics' odour emission. This estimate does not account for the proposed expansion of the Loop Organics facility from 55,000 tonnes to 95,000 tonnes.
 7. Furthermore, the mitigation measures proposed in the Modification 3 Report are the same as those proposed in the Modification 2 reports. However, Modification 2 is not approved or operational, so it is not appropriate to state that there is expected to be a minimal change in odour from Modification 2 to Modification 3, without having fully measured the impacts of Modification 2.
 8. Mitigation measures should also consider circumstances where the leachate dam generates excessive odour such as when aerobic conditions are not maintained.

Should you require any further information or like to discuss this matter further, please do not hesitate to contact me.

Kind regards,

Alex Morris



Alexandra Morris Senior Environmental Scientist Loop Organics Pty Ltd
P: **0244641800** M: **0401 729 335** E: alex.morris@looporganics.com.au
looporganics.com.au 6/65 Queen Street, PO Box 259, Berry NSW 2535