



Our Ref: E-100265527

Department of
Environment and Science

Wednesday, 3 January 2024

NORGANIC PROTEINS PTY LTD (ACN 624 329 764)
'HQ Robina' Suite 14 Level 1,
58 Riverwalk Avenue,
ROBINA, QLD, 4226

Cc: Kent Quinn kent@norganicpro.com
Allana Turner allana@norganicpro.com
1 Coolum Street
LANDSBOROUGH QLD 4550

Dear Mr Quinn

RE: Finalisation of an Environmental Protection Order – E-100265527

Take notice: that on Friday, 23 September 2022 the administering authority issued an environmental protection order (EPO) to Norganic Proteins Pty Ltd (ACN 624 329 764) (Norganic/you) under the *Environmental Protection Act 1994* (the Act). On Tuesday, 25 October 2022 the EPO was amended. The administering authority is the Chief Executive of the Department of Environment, Science and Innovation (the department) formerly the Department of Environment and Science.

The EPO was issued in respect to the activities of prescribed environmentally relevant activity (ERA) 25 (3b) - Meat Processing - Rendering, without any other processing, in a year, the following quantity of meat or meat products - more than 500t, under the environmental authority EPPR00188913 (the EA) on land described as Lot 2 on RP208083 situated at 1 Coolum Street, Landsborough QLD 4550 (the site).

A. Requirements

The requirements of this EPO were:

1. By 5:00 pm on 5 October 2022 Norganic must engage an independent Appropriately Qualified Person (AQP) to develop an Odour Assessment and Management Plan (OAMP) that addresses the requirements of the EPO and confirm the engagement to the administering authority in writing to sunshinecoast.esr@des.qld.gov.au. The written confirmation of the engagement must include a copy of the AQP's resume identifying the person(s) academic qualifications and experience relevant to resolving complex odour nuisance issues.
2. Norganic must require the AQP to develop an OAMP that:
 - a) clearly demonstrates the methodology the AQP will use to investigate all sources of odour associated with all plant and equipment at the site (including plant and equipment to manage wastewater) that has the potential to cause odour nuisance;
 - b) describes a full audit framework of all activities; current odour management equipment (such as condenser, biofilters, odour suppressant chemicals and any other equipment); and procedures, at the site to identify all actual and potential odour

sources that may contribute to odour nuisance beyond the boundaries of the site. The audit framework in the OAMP must include:

- i. the investigation and identification with likelihood assessment of airborne fugitive and point source emissions of contaminants/odour from all facilities on site including an assessment of the effectiveness of odour capture from the cooking process;
 - ii. the investigation of the efficacy of the onsite biofilter, giving consideration to the age of filter medium, biofilter media moisture content, atmospheric temperature variation and impact due to varying rainfall and dry weather conditions;
 - iii. the temperature of the air entering the biofilter in a range of ambient temperatures and the resulting impact to performance;
 - iv. the temperature difference between water entering the aerobic ponds and the standing pond water and the potential to result in odourised steam; and
 - v. how potential emissions released would change over time with degradation of the controls or change in seasonal conditions; and
- c) evaluates Norganic's existing odour mitigation measures against industry best practice and make a list of prioritised recommended actions with implementation timeframes to prevent the release of offensive odour beyond the boundaries of the site.
3. By 5:00pm on 2 November 2022 and later revised to 14 November 2022, Norganic must submit the OAMP developed by the AQP to the department at sunshinecoast.esr@des.qld.gov.au for the department to review the content of the OAMP for the suitability of securing compliance with condition A1 of EA and the GED.
 4. Within 15 business days of receiving the departments review of the OAMP, Norganic must work with the AQP to address the departments comments and provide a final version of the OAMP.

Definitions:

Appropriately qualified person(s) (AQP) means a person or persons who has professional qualifications, training, skills and experience relevant to the EPO requirement and can give authoritative assessment, advice and analysis in relation to the EPO requirement using the relevant protocols, standards, methods and/or literature.

B. Compliance with the requirements

In determining compliance with these requirements of the EPO, the department has considered:

1. the required information in relation to the AQP engaged to undertake the works received on 5 October 2022;
2. the initial submission, provided on 14 November 2022 of an Odour Assessment Management Plan (OAMP) identifying odour sources and requirements outlined in the EPO; and an Odour Management Plan (OMP) which aimed to provide a framework whereby Norganics could control, minimise, and manage the identified odour sources in response to the EPO;
3. a revision of both the OMP and the OAMP provided to the department on 7 February 2023 incorporating updates based on the departments review of the original documents;

4. An action plan developed with the OAMP, including progress updates provided to the department demonstrating works completed over time; and
5. The works completed on site including:
 - the refurbishment of the existing biofilter;
 - enclosing the facility to reduce odour release;
 - improvements to air extraction;
 - the installation of rapid roller doors at the receival bay;
 - community interaction for rapid identification of issues;
 - procedural changes to material receival and general operations; and
 - commencing construction of an additional biofilter.

C. Obligations

The department has determined that Norganic has satisfied the requirements of the EPO. This letter serves as notice that the EPO is finalised and no longer in effect. Norganic has made a request to the department to be provided an opportunity to implement the action plan outside of a statutory notice. Based on Norganic's cooperation and willingness to work with the department, Norganic will not be issued a follow up EPO at this time. This is on the condition that Norganic continue to improve the facility and reduce odour impacts as required and in accordance with the action plan.

Norganic is reminded of their responsibility to comply with conditions contained in Environmental Authority EPPR00188913 and that should the department deem it necessary further compliance action may be taken.

Should you have any queries in relation to this notice, please contact Senior Environmental Officer, Luke O'Brien on telephone number 07 5459 6138.



Signature

Tim Brain
Manager Compliance
Department of Environment, Science
and Innovation
Delegate of the Chief Executive
Environmental Protection Act 1994

3/01/2024

Date

Enquiries:
Luke O'Brien
Compliance Centre: **Sunshine Coast**
Email: sunshinecoast.esr@des.qld.gov.au
Telephone: 07 5459 6132

