

Environmental Enforcement Order

Environmental Protection Act 1994

Pursuant to section 362

ORDER ID	STAT-E-101047682
Date of issue	~~13 March 2026~~ <u>1 April 2026</u>
Issued to (you/Norganic)	NORGANIC PROTEINS PTY LTD (ACN 624 329 764) <i>For the purpose of this Environmental Enforcement Order (EEO), 'you' means the recipient of this EEO.</i>
Registered address	'HQ Robina' suite 14 level 1, 58 Riverwalk Avenue, ROBINA, QLD, 4226
Site address (the premises)	1 Coolum Street LANDSBOROUGH QLD 4550
Land reference	Lot 2 on Plan RP208083
CC to	1 Coolum Street LANDSBOROUGH QLD 4550
Issued by (the delegate)	 Ben Grant, Compliance Delivery Manager Delegate of the Administering Authority Chief Executive of the Department of the Environment, Tourism, Science and Innovation (the department)
Relevant Grounds	• s359(c) To secure compliance with the general environmental duty. • Section 359(e) It is necessary to issue an environmental enforcement order to secure the person's compliance with (ii) a condition of an environmental authority
Service method	☒ Registered post ☐ Hand delivered ☒ Also by email ☐ Orally (s369(2))
Contact	If you have any questions about this EEO, please contact: Luke O'Brien, Sunshine Coast Compliance Centre Email: sunshinecoast.esr@detsi.qld.gov.au Telephone: (07) 5459 6132
Further information	Please read the Information Sheet - Recipient of an Environmental Enforcement Order (detsi.qld.gov.au) for further information (search for ESR/2024/6802 on www.detsi.qld.gov.au). Terms used in this EEO have their meaning defined in the Definitions section of the EEO or, if not defined, in the <i>Environmental Protection Act 1994</i> (the Act).

This EEO was originally issued on 13 March 2026 and was amended on 1 April 2026, to extend the due dates for required actions 2 to 4 of this notice. The dates were extended in response to a request from the appropriately qualified person (AQP) engaged under requirement 1 of this notice. New text in the amended EEO is shown as underlined and deleted text is shown as strikethrough.

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Why are we writing to you?

Under section 362(1) of the *Environmental Protection Act 1994* (the EP Act) the administering authority may issue an order (an environmental enforcement order) to a person if the authority believes an enforcement ground exists for the person.

Under section 359 of the EP Act, each of the following is a ground (an enforcement ground) on which to issue an environmental enforcement order to a person.

Section 359(c) of the EP Act states, '*it is necessary to issue an environmental enforcement order to secure the person's compliance with the general environmental duty.*'

The department requires you to take reasonable measures to secure compliance with the general environmental duty. The general environmental duty is prescribed in section 319 of the EP Act which states the following: '*A person must not carry out any activity that causes, or is likely to cause, environmental harm unless the person takes all reasonably practicable measures to prevent or minimise the harm (the general environmental duty, GED).*'

Section 359(e) of the EP Act states, '*It is necessary to issue an environmental enforcement order to secure the person's compliance with (ii) a condition of an environmental authority.*'

The department requires you to take reasonable measures to secure compliance with condition A1 of environmental authority EPPR00188913 (the EA) dated 18 April 2018. Condition A1 of the EA states '*Odours or airborne contaminants must not cause **environmental nuisance** to any **sensitive place or commercial place**.*

What are you required to do?

Please read this EEO carefully and carry out all the required actions listed below by the required dates.

Terms used in this order have the meaning defined in the Background and Definitions section of the EEO, or if not defined, in the Act.

If you have any questions about this EEO, please contact Luke O'Brien by email sunshinecoast.esr@detsi.qld.gov.au or telephone 07 5459 6132.

Required actions:

1. By **20 March 2026**, you must engage an appropriately qualified person/s (AQP) to undertake the actions identified in the requirements below (2-6) and provide notification of this engagement to the department, including evidence of the AQP's relevant knowledge and experience.
2. By ~~3 April 2026~~ **30 April 2026**, you must complete a comprehensive review of existing operations from an odour emissions risk perspective, including the rendering process, boiler activities, and wastewater treatment plant.
3. By ~~3 April 2026~~ **30 April 2026**, you must complete an assessment of the infrastructure and operational practices in relation to the odour collection and control.
4. By ~~17 April 2026~~ **30 April 2026**, you must complete an odour surveillance program to identify and characterise all potential odour emission sources and assess their associated odour impact risks under all current operating conditions. All gas sampling is to be carried out in accordance with the relevant standards and testing undertaken at a NATA-accredited laboratory.
5. By ~~7 May 2026~~ **30 May 2026**, you must email a draft report of the odour surveillance program for the department to review. The report must detail the findings from actions 2, 3 and 4 above and include a list of actions with due dates for the completion of the actions.

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6. Within **15 business days** of receiving the department's comments on the draft report submitted under requirement 5, you must submit a final report that incorporates the department's comments.

Any submissions required by this EEO are to be sent via email: sunshinecoast.esr@detsi.qld.gov.au or via mail to Department of the Environment, Tourism, Science and Innovation, PO Box 362 MAROOCHYDORE QLD 4558

Background and definitions:

1. The department is the administering authority and has responsibility for enforcing the EP Act.
2. You are the landowner and occupier of the premises
3. You hold Environmental Authority EPPR00188913 (the EA) dated 18 April 2018.
4. The EA is for environmentally relevant activity (ERA) 25, Meat processing activities, 3: Rendering, without any other processing, in a year, the following quantity of meat or meat products, (b) more than 500t, at the premises.
5. The department is satisfied that you are responsible for the operation and maintenance of the premises under the EA.
6. Section 430, EP Act — Contravention of condition of environmental authority 'The person must not contravene a condition of the authority. Condition A1 of the EA states: 'Odours or airborne contaminants must not cause **environmental nuisance** to any **sensitive place** or **commercial place**'.
7. On 17 November 2025, the department received a report of odour causing environmental nuisance at a sensitive place and alleging Norganic as the source. The department requested that the reporter provide an odour log, the odour log was received by the department on 18 December 2025.
8. On 27 November 2025, the department received another report of odour causing environmental nuisance at a sensitive place alleging Norganic as the source. The department requested that the reporter provide an odour log, which is yet to be submitted.
9. On 2 January 2026, the department received a report of odour causing environmental nuisance at a sensitive place which included an odour log and alleging Norganic as the source.
10. On 16 January 2026, the department conducted odour monitoring attempting to experience the reported odour at sensitive places based on information provided in the odour logs. Although the odour was detected briefly the wind direction resulted in minimal recorded odour during monitoring.
11. On 21 January 2026, the department conducted a site visit for the purpose of capturing air monitoring data over various parts of the site using drone capabilities to identify any clear sources of odour. Initial data provided indication of odour sources and was used to refine further efforts in a follow up visit.
12. During the inspection on 21 January 2026, the department was informed of an issue that had occurred in late 2025, related to a crack in cooker four. This resulted in excessive high temperature odorous steam entering the biofilter and potentially impacting the effectiveness of the odour mitigation control. Several attempts to repair the cooker were made before it was replaced in January 2026.
13. On 27 and 28 January 2026, odour causing environmental nuisance at a sensitive place was reported to the department alleging Norganic as the source.
14. On 29 January 2026, an existing reporter identified further odour causing environmental nuisance at a sensitive place on the evening of 29 January 2026 alleging Norganic as the source.

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15. On 30 January 2026, the department conducted odour monitoring attempting to experience the reported odour at sensitive places based on information provided in the odour logs. Odour was experienced intermittently offsite, immediately after an inspection of the premises was undertaken tracing the odour experienced to the premises.
16. During the inspection on 30 January 2026, authorised officers noted the extraction system that directs odorous air to the main biofilter was leaking. Odorous steam and water were venting from the fan at the biofilter manifold releasing to the atmosphere.
17. On 5 February 2026, the department conducted early morning odour monitoring attempting to experience the reported odour at sensitive places based on information provided in the odour logs. Odour was experienced consistently by authorised officers and described as strongly offensive and of strong intensity during the monitoring. The department confirmed that Norganic was the source.
18. On 6 February 2026, the department conducted late evening odour monitoring attempting to experience the reported odour at sensitive places based on information provided in the odour logs. Odour was experienced away from the premises however not at a sensitive place during the monitoring period.
19. On 10 February 2026, the department conducted early morning odour monitoring attempting to experience the reported odour at sensitive places based on information provided in the odour logs. Odour was experienced consistently by authorised officers and described as offensive and distinct through periods of the monitoring. The department confirmed that Norganic was the source.
20. On 10 February 2026, the department received a report of odour causing environmental nuisance at a sensitive place alleging Norganic as the source..
21. The department concludes that you have not complied with your GED and have failed to undertake reasonable and practicable measures to minimise the likelihood of environmental harm at the premises.
22. On 13 February 2026, the department sent you a pre-enforcement letter outlining the alleged contravention and providing you an opportunity to respond.
23. On 27 February 2026, you provided a response to the pre-enforcement letter.
24. The delegate has considered your response and the circumstances (including the standard criteria and human rights) and determined that the required actions within an EEO are reasonable to remedy or otherwise address the relevant matters.
25. The delegate is issuing this EEO to you to secure compliance with the GED and condition A1 of the EA ('the relevant matters').
26. This EEO takes effect from the date service and remains in force until stayed, amended, revoked, or finalised.
27. On 1 April 2026, the EEO was amended based on a request from the AQP who has been engaged under requirement 1 of this notice to complete the works. The request to amend the time frames of the requirements was cited to be a result of '...Easter holiday period and suitable weather conditions for fieldwork'. The proposed time frames are considered justified and have been approved to ensure the investigation is robust and appropriately addresses the requirements. The EEO (STAT-E-101047682) was amended and re-issued on 1 April 2026.

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Definitions used in this EEO *(that are not exactly as the Act defines or implies them)*

Appropriately qualified person	A person who has professional qualifications, training, skills, or experience relevant to the requirements of this EEO, and can give authoritative assessment, advice, and analysis in relation to the requirements using relevant protocols, standards, methods, or literature.
Authorised representative	A representative that has been nominated by the person this EEO relates to, for acting on their behalf when dealing with the Queensland Government to manage matters. For more information, read the guideline Authorisation letter to nominate an Authorised Holder Representative (available at www.qld.gov.au using the publication number ESR/2019/5168 as a search term).
Land	This refers to the cadastral reference of the premises referenced in this EEO.
NATA	National Association of Testing Authorities
Resource	Waste being a <i>resource</i> is not a waste, only if it complies with an End of Waste Code. For more information, go to End of waste codes Business Queensland .

Considerations

The standard criteria and human rights were considered prior to issuing this EEO.

Offences

Failure to comply with this EEO is an offence unless you have a reasonable excuse. The maximum penalties are significant and are provided in s369A of the EP Act.

Penalties and obligations

It is important that you know the impact to you personally as an individual or as a corporation for not meeting your obligations.

- If you propose to dispose of the place or business to which the EEO relates, you must advise the buyer of the existence of this EEO. **Failure to provide a written notice to the buyer of the existence of the order is an offence.** The maximum penalty is provided in s369C of the Act.
- If you cease to carry out the activity to which this EEO relates, you must give written notice of ceasing to carry out the activity to the department within 10 days of ceasing the activity. **Failure to provide written notice to the department within 10 business days of ceasing the activity to which an EEO relates is an offence.** The maximum penalty is provided in s369D of the Act.

Right of review and appeal

The provisions regarding reviews of decisions and appeals are found in s519 to s539 of the Act.

A person who is dissatisfied with an original decision made by the department may apply to have that decision internally reviewed. Information about initiating an appeal in relation to this notice is contained within the [Internal Reviews and Appeals Information Sheet](#) (available at www.qld.gov.au using the publication number ESR/2015/1742 as a search term). A request for review or appeal is to be made using the approved form [Application for review of original decision](#) (available at www.qld.gov.au using the publication number ESR/2015/1573 as a search term).

Applications for reviews are to be sent to Permits and Licensing, Department of the Environment, Tourism, Science and Innovation via email at palm@detsi.qld.gov.au, or by mail to the following address: GPO Box 2454, BRISBANE QLD 4001.

Where an application has been made for a decision to be reviewed, the applicant may also apply to the relevant court for a stay of the decision to secure the effectiveness of the review.

Once the original decision has been reviewed, a person who is dissatisfied with the review decision may be able to appeal against that decision to the relevant court within 22 business days after receiving notice of the review decision.

For a decision that is not an original decision, there are no formal review and appeal rights for a person who is dissatisfied with the decision made by the administering authority. The person may have other legal rights and may wish to seek legal advice.

Privacy statement

Section 540 of the Act requires the department to maintain a register of certain documents and information authorised under the Act. A copy of this document will be kept on the public register. The register is available for inspection by members of the public who are able to take extracts or copies of the documents from the register.

Documents that are required to be kept on the register are published in their entirety unless redaction in part is required by the Act. There is no general discretion allowing the department to withhold documents or information required to be kept on the public register.

For more information on the department's public register, search 'public register' at www.qld.gov.au. For queries about privacy matters, please email privacy@detsi.qld.gov.au or telephone 13 74 68.

Accessibility

Contact us if you need this information in an accessible format such as large print or audio.

Interpreter assistance

If you need interpreter assistance or want this document translated, please contact us and advise your preferred language. If you are deaf, or have a hearing or speech impairment, contact us through the [National Relay Service](#)

