12-14 Arnott Street
Hume
Canberra
ACT 2620
www.goterra.au

Dear Mr Shute,

I refer to your letter of 13 October outlining requested additional information to progress the DA 219.1/2023. This letter has been collated as a reference guide to demonstrate where the proponent has shared information that is sought by the Council. Your feedback would be much appreciated.

Lack of Weighbridge

The business does not propose any weighbridge or scales onsite to measure the incoming weight of deliveries of products. Concern is raised that the business will not be able to accurately weigh and document all waste being received at the business for processing. Given the nature of activities proposed onsite, it is considered prudent that a weighbridge or scales are included onsite to accurately document the receival and acceptances of waste.

Goterra proposes to use the same process as is used at the ACT facility where waste is not allowed to be tipped before a weighbridge docket has been presented and accepted by staff. This is outlined on pg. 61 and clarified on pg. 14 of the EIS.

Quantity of Waste

When calculating the daily receival tonnage of waste as stated in the Environmental Impact Statement and Goterra Business Management Plan, the proposal exceeds 6000 tonnes per year, therefore making the facility a scheduled activity and requiring a licence from the Environment Protection Authority. Given the above, the proposed development would be a scheduled activity and require an Environment Protection Licence from the Environment Protection Authority.

Capacities expressed in both documents are based on the maximum design capacity on a given day noting that its good Industrial Engineering practice to design for overage within these systems. It's the proponents responsibility to ensure its total Monthly / Annual intake quantities do not exceed the limits established. Note pg. 44 of the EIS clearly defines the proponents responsibility to not exceed the limits and thresholds. Pg. 10 of the POM provides business continuity in the event the thresholds are met.

Waste Management

The Applicant shall demonstrate how the proposal will store all waste products, inclusive of packaging from food products, wholly within the parameters of the building. The Applicant must ensure that all waste is stored inside, prior to being taken offsite by the private waste contractor.
Environmental Impacts
• The Applicant shall explain why wastewater and wash waters are unable to be treated onsite and disposed of to the sewer through a trade waste agreement with Sydney Water.
Negotiations in place with a composter who wants to apply the wastewater as a useful nutritional additive to existing compost. Note the composter will abide by relevant waste reuse orders and exemptions.
• The design of the waste receival area does not demonstrate that trucks which dispose of waste at the facility, will not track out rubbish and leachate out of the facility. A Site Inspection by Council Officers has revealed that the receival area is not sloped or graded to a drain to facilitate the cleaning and collection of wastewaters. The receival area is required to be cleaned daily to prevent odours from occurring. The Applicant shall demonstrate that the design of the waste receival area will address all the concerns raised above.
Noted. Please see updated drawings as requested in the architectural section. Bunding at 100mm minimum will be installed along the front of the bunker providing a bunded capacity of 5.4kL, along with 900mm walls on the remaining three sides. This was not installed at the time of the site inspection as it would create an impediment to the installation of the MIBS via truck.
• The Applicant shall demonstrate how the firefighting waters shall be contained onsite in the event of a fire. The Applicant shall also confirm whether there is a stormwater isolation valve onsite.
Bunding around the waste and storage areas will contain firefighting waters which may have waste residuals present. A GIPA has been submitted for the stormwater isolation valve information and will be provided once it is available to the applicant.
• It is unsure how many litres of wastewater are proposed to be generated at the site and how this will be disposed of. The Applicant shall confirm where the wastewater generated from the hot and cold wash be disposed of and the amount of wastewater generated as a result of this process.
Wastewater volume identified in Table 2 Key Statistics on pg. 12 at 800-1000kL / month. Updated EIS includes more granular detail explaining 4 kL / day maximum from screw press, 2 kL / day from wash baths and 1 kL / day from cleaning wash down. Wastewater will be discharged to a composting facility via a vacuum truck operated by that composter. Negotiations are ongoing and details can be supplied if requested. Once finalised, Council will be informed of the arrangements.

Swept Path Plans

The submitted Swept Path Plans illustrate vehicles entering and exiting the proposed ramp for unloading activities. However, it is unsure how the proposed Heavy-Rigid Vehicles (HRVs) will satisfactorily manoeuvre into and out of the proposed loading dock. The Applicant shall submit amended Swept Path Plans which demonstrate the above, ensuring all vehicles can enter and exit the site in a forward direction.
See newly submitted plans at Appendix LL.

Loading/Unloading Schedule

The Applicant shall provide further information/clarification with respect to the proposed loading and unloading activities to occur onsite, including but not limited to the following information.
• How many vehicles will be onsite at any given time.
A maximum of two vehicles will be on-site at any given time. See pg. 67-68 with revised table 17
• How long will each vehicle be expected to be onsite.
Vehicles delivering waste are expected to be on-site for no longer than 30- 45 minutes. This is aligned to timing at existing Canberra facility. Vehicles making other deliveries or collections are expected to be on-site no longer than 45 minutes. See pg. 66 with revised table 17.
• What times will loading/unloading activities occur on a daily basis.
See table 17 on pg. 67-68
• What times garbage collection will occur on a daily basis.
See table 17 on pg. 67-68.
• Size of all vehicles used for loading/unloading activities, including dimensions.
See updated Table 14 on pg. 64
• How will the Applicant ensure no vehicle conflicts will occur onsite, including queuing of vehicles and delays in loading/unloading activities.
Timing of trucks is outlined in the new Table 17 on pg. 66. The short turnaround time for trucks greatly reduces the risk of queuing. The ability to use the loading dock as a last resort parking area is also appreciated.

Air Quality Impact Assessment

An assessment of the Air Quality Impact Assessment, prepared by Environodour Australia Pty Ltd, Dated 11 April 2023, Job No: EJ509, has revealed several issues as listed below.
• The proposal will receive waste drop off on a Sunday as per the Environmental Impact Statement. The Applicant shall ensure that this is reflected within the Report.
Noted and updated version will be provided once returned from EPA (see end comment).

• The Applicant shall confirm if the exhaust stack height (6 metres), is measured from the ground level or from the top of the roof line and above.
• The Applicant shall clearly identify and discuss all equipment, construction and pollution control equipment proposed to be installed, to each area of the proposal that has been identified to generated odour. The Applicant shall discuss the effectiveness of the equipment in reducing and mitigating odours.
• The Applicant shall demonstrate what other additional odour control/mitigation measures can be incorporated/retrofitted into the current design, to ensure that if odour complaints are received during operation, these additional odour control/mitigation measures can be installed to reduce/mitigate odours levels to a compliant level.
• The Applicant shall confirm if a worst-case scenario has been assessed to ensure that any potential underestimated odours are captured and capable of being mitigated to ensure compliance with the performance criteria of 2 OU/m3.
Further advice has been provided to the NSW EPA with regard to Odour assessment which align with these comments. We request that this is considered once EPA submits their advice to Council.

Noise Impact Assessment

An assessment of the Noise Impact Assessment (NIA) prepared by Environmental Monitoring Services Pty Ltd, Report No: EMS23 0622, Dated 15 June 2023 is considered insufficient in its current form. The Applicant shall provide a clear statement confirming that all vibrating equipment proposed to be installed/use has been assessed and will comply with the vibration assessment criteria as indicated within the Report.
See statement to this effect in pg. 56. It is noted that the make and model of vibratory sifter is identical as the one examined at the Canberra facility.

Resilience and Hazards

The Planning Secretary's Environmental Assessment Requirements (SEARs) submitted as part of the Development Application, stipulates a "preliminary risk screening completed in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 3 and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011)". The Applicant shall address the above.
See updated site plan and the new proposed chemical register on pg. 46.

Architectural Plans

The submitted Architectural Plans contain insufficient detail. The Applicant shall submit amended Architectural Plans which address the following.

• Elevation Plans which indicate the location and height of all stack and vents to be installed onsite shall be submitted to Council

This has been provided in Sectional elevations within Appendix T. With regards to final design for odour control, we have consulted with the EPA and will finalise design drawings shortly. We can provide these at the same time as the response to the Odour Control questions.

• The Applicant shall indicate the location of all liquid waste storage tanks that will be used to store liquid waste for it to be collected by a licensed waste collection service.

See Appendix DD

• The Applicant shall show the location of all waste storage (skip bins) bin on the subject premises.

See Appendix DD

• The location of all bunding shall be clearly indicated on the Ground Floor Plan - See new Appendix X

• The location of all stormwater inlets shall be indicated on the Site Plan. - See new Appendix FF

• The Applicant shall demonstrate that the design of the waste receival area will not allow trucks which dispose of waste at the facility, to track rubbish and leachate out of the facility.

See comments pg. 14 and updated design showing bunding. Please note that of the concrete blocks that were observed on-site during the visit, not all were in place. A stack two heigh (900mm) will be in place on the right-hand side as one is facing the bunker, which was not present to allow for the installation of the MIBS and other equipment. The front of the bunker area will be contained with a one-high stack of the same 450mm concrete blocks.

• The Applicant shall indicate the location of all final products (frass and protein larvae on the site).

See Appendix DD

Plan of Management

A Plan of Management specific to the subject premises was not submitted as part of
the Development Application. Accordingly, a Plan of Management shall be submitted
to Council, including but not limited to the following.

• Activities and measures to be undertaken by the business to reduce any odours emitted by the proposal. The Applicant shall detail the frequency of these activities/measures being undertaken.

Cleaning tasks were already included in the job description for Waste Processing team. Clarified to indicate these tasks are daily / per shift.

• Detail the pest control program and how often pest control will be undertaken to reduce pests onsite.

See new Pest Control table on pg. 20 of PoM

• Detail how the waste receival area and waste contaminated equipment will be cleaned, including frequency of cleaning.

At the end of each shift. Power washers will be used to hose down the equipment, and the used water will be collected via wet vacuum and discharged to the IBC storage.

• Confirm the volume of wastewater and liquid leachate to be stored on site and how often this liquid waste will be collected by a licensed waste contractor.

Expressed in truck movements table in EIS - daily.

• Detail how the volume of waste received by the facility is accurately recorded to demonstrate that the facility receives waste in accordance with the proposal.

Weigh dockets are a pre-requisite for the waste to be tipped. Recorded using our digital systems (MagOps).

• Stipulate the amount of insect protein and insect frass to be stored on-site at any given time. The Applicant shall detail how often the final products will be collected from the site.

See EIS table 4 on pg. 17. 35 bulk bags of 7T and 15T respectively will be stored (noting density of protein half compared to frass).

• Demonstrate that the proposal has a complaint register and stipulate what procedures are in place that the business will follow if noise/odour complaints are received.

In accordance with the escalation process on pg. 37 of the POM we have a method for handling complaints. We will implement, in accordance with an updated version of our ACT licence, a telephone line which will be available on our website.

• Demonstrate what measures and procedures will be in place to reduce any potential odours emissions from occurring.

See new Odour section of POM pg. 20.

• Demonstrate procedures and spill response and spill containment devices to be present onsite

Note existing procedure outlined pg. 39-40. Spill kit map uploaded as well in response to this request. There will be three general spill kits and a specialist chemical spill kit on site, as well as the bunding as demonstrated in that layout map.

• Detail the frequency of waste and liquid waste collection to occur at the site.

See EIS table 17

• Confirm the maximum volume of liquid waste to be present on site at any given time.

Wastewater will not exceed 10kL at any one time. Note that 'liquid waste', in the definition as given in Schedule 1 of the POEO Act 1997 will not be present at the

site as waste is not received in liquid form. The storage tanks for the partially processed waste will constitute 50kL total capacity.

• Submit a Site Plan, indicating the location of all spill response equipment, bunding and spills kits. Details shall be provided on all bunding to be provided and confirmation that all bunding is capable or has been designed to retain a minimum of 110 per cent of the volume of liquids stored onsite.

See attached, including calculations for the volume of each bunded area. Note that bunding has been designed to the 110/25 principle.

• Indicate the location of all stormwater drainage inlets.

No stormwater drainage inlets within the confines of the facility.

• Demonstrate that the business is using best management practises to ensure that there is no odour, water and land pollution emissions.

Goterra is committed to best practice and has developed the EMP attached as Appendix K.

• Detail the frequency of equipment (conveyor belts, de-packers) being cleaned to reduce odour emissions.

Outlined in task section of the POM (pg. 8). Note that washdown will occur at the end of each shift.

• The Applicant shall detail how the facility and all processing and waste storage area will be protected from flood events. The Applicant shall confirm that the waste receival area is above the floor level for the site.

Note that the flood level is well below the height of the floor of the unit, as demonstrated in Appendix P (Flood Report). The waste will be tipped in a bunded area of 450mm walls which will mean the waste area is never able to be impacted by the PMF height.

Rural Fire Service

The subject Development Application was referred to the Rural Fire Service. The Rural Fire Service request that a Bushfire Report be submitted as part of the Development Application.

As discussed with Mr Shute on the morning of 25 October 2023, no Bushfire Report is required to be submitted with this additional information at this stage, per the conversation. Goterra will await further response in this regard. In the call, both parties agreed that the site is very low risk. Reference to bushfire prone maps has been included on pg. 49.

Environment Protection Authority

Please be advised, the amended documentation submitted as part of the subject Development Application was referred to the Environment Protection Authority (EPA).

Once the EPA have completed their referral, the Applicant will be notified of the outcome accordingly.

Please be advised that further discussions have been had with the EPA on 25 October 2023 to provide further clarification to assist them in making recommendations to Council. We request to wait EPA providing Council feedback before addressing odour control questions here.

Council's Traffic Branch

The Applicant shall submit a Site Plan, which indicates the dimensions of car parking spaces, loading docks and the associated aisle width (trafficable area) onsite. The Site Plan shall comply with the requirements of Australian Standards (AS/NZS 2890.1:2004 and AS 2890.2:2018) and the loading docks shall comply with the requirements of AS 2890.2:2018 to accommodate the design vehicles.

Updated site plans including the parking bay sizes, measured in alignment with the aforementioned Australian standards have been uploaded. Note additional comments added on pg. 68 with regards to parking sizes. Spaces are sized appropriately for the type of parking required, likelihood of traffic impact if a vehicle doesn't fit and in alignment with the standard - ie. they comfortably fit vehicles of the 85th percentile. The loading dock similarly meets the requirements of the standard. As shown on the Positioning layout, sizes are:
Parking space - 2500mm x 5300mm
Loading dock - 6500mm x 14000mm

The Applicant shall submit a Loading Management Plan, which indicates the number and types of vehicles that are expected to service the site on a daily basis. The Applicant shall demonstrate that the site has adequate capacity to accommodate traffic generated by the development during the AM and PM peak hours, without adversely impacting the surrounding road network.
See table 17 Arrival and Departure movements.

The submitted Swept Path Plans have not demonstrated that the proposed 19m truck can satisfactorily exit the site. The Applicant shall illustrate the exit movements of the 19m truck from the site onto Newton Road. Given that there are existing double barrier lines on Newton Road at/near the site's entry/exit driveway, the driveway must be designed in a way that it would allow the largest vehicle (19m vehicle) to exit the site without adversely impacting other road users.

19m trucks were included in the Swept Path diagrams as Cleanaway had proposed using such vehicles to deliver waste. Subsequent negotiations have resulted in the largest trucks that will access the site being agreed to HR trucks (12.5m). See the updated table 14 of the EIS on pg. 64. The POM indicates that HR or MR trucks will attend site for waste receival / offtake (as identified on pg. 6 of the POM). These trucks will be satisfactorily able to ingress and egress Newton Rd into the facility without adversely impacting other road users.