30 June 2026

The Assessment Manager
Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

Attention: Richard Green
By Email: richard.green@tr.qld.gov.au

Dear Richard,

RESPONSE TO INFORMATION REQUEST – SECTION 68, PLANNING ACT 2016 & CHAPTER 1, PART 3, SECTION 13, DEVELOPMENT ASSESSMENT RULES – CHANGE APPLICATION (OTHER CHANGE) – MATERIAL CHANGE OF USE – IMPACT – EXTENSION TO INTENSIVE ANIMAL INDUSTRY AND HIGH IMPACT INDUSTRY (MANURE IMPORTATION AND PROCESSING) - 556 GRASSDALE ROAD, GRASSDALE – LOT 26 SP216179 (Council Ref: MCUI/2017/346/D) (Our Ref: 2026-227)

I act on behalf of the applicant, Mort & Co Lot Feeders Pty Ltd, in respect of the above matter.

I refer to Toowoomba Regional Council's (**Council**) Information Request, dated 11 June 2026, in respect of a Change Application (Other Change) – Material Change of Use - Extension to Intensive Animal Industry and High Impact Industry (Manure Importation and Processing) at 556 Grassdale Road, Grassdale described as Lot 26 SP216179.

The following advice provides a response to the matters raised in Council's Information Request. For ease of comprehension, each item raised in the Information Request has been reproduced in bold print followed by the associated response.

ISSUES AND RESPONSES

1. AIR QUALITY MANAGEMENT PLAN

1.1. Issue:

An Air Quality Management Plan (MCLF File No EMP16 and dated 3 June 2020) was endorsed by Council in June 2020 under MCUI/2017/346/A. This document described processes for composting, granulation and drying of manure / compost at the manure processing facility.

Condition 45 of the current Decision Notice requires this Air Quality Management Plan to be updated when site activities change. As the main environmental risks for the manufacturing of fertiliser are air quality and odour, this management plan is required to be updated. This must include all steps in the manufacturing process where odour and dust emissions are likely:

- ***Raw Materials Handling and Storage***
- ***Batching and Blending***

- *Raw Material Intake*
- *Conditioning*
- *Granulation/Rounding*
- *Drying*
- *Bulk Storage and handling*

In addition to the above, the current Air Quality Management Plan (Approved under MCUI/2017/346/A) notes:

Air Quality Management Practices – Drying

1. ***Minimise impact temperature set point, restrict temperatures over 280 deg C to prevent generation of strong odours***
2. ***Water is sprayed into the wet scrubber, removing dust and odour from the exhaust air helping to reduce the exhaust air temperature.***

The submitted Fertiliser Management Plan and the Fertiliser Process and Operational Management Overview both list the maximum temperature in the fertiliser manufacturing process as 800C. Further, the use of wet scrubbers for odour or dust mitigation is not discussed in either of the abovementioned, but is in the Air Quality Management Plan.

There are differences between the processing of manure and the processing of fertiliser products that do not match the endorsed Air Quality Management Plan and the recently submitted Fertiliser Management Plans. These differences need to be discussed and clarified so the processes are clear for each product being produced and the supporting documents align with the activities to be conducted on site.

Information Required:

Provide response to the following:

1. ***Confirm if the Air Quality Management Plan that was endorsed under Condition 44 is still current and reflects the processes for fertiliser manufacture as well as the processing of manure.***
2. ***Confirm if there are separate process for manure processing vs fertiliser manufacture and if so, update the Air Quality Management Plan so each process stream is included and those processes align with the recently submitted documents.***
3. ***Confirm if heating and drying to 2800C is required for manure processing and for fertiliser production.***
4. ***Confirm if wet scrubbers are required for both manure processing and for fertiliser production.***
5. ***Where required, update the Fertiliser Management Plan and the Fertiliser Process and Operational Management Overview so all documents are consistent with each other.***

Response

In response to the above items, reference is made to each item response below:

1. The Air Quality Management Plan is still current, however, has been updated to ensure it reflects all operations as of the date of this response. Refer to the updated Air Quality Management Plan attached at **Appendix A**.
2. There are specific and dedicated processes for the composting and the processing of the organic material. These are further defined in the attached management plans and process overview.

3. The heating and drying operations utilise direct fired gas burners to heat the air that in turn dries the processed granules. The gas burners operate at a maximum of 140°C and heat the air to approximately 80°C. The granule is then dried using this heated air. During the drying process the granule is not expected to get above 60°C with a final exit temperature of approximately 40°C as the granule does traverse a cooling chamber before discharging.
4. The original process intended to use wet scrubbers. The process has since been refined and a dry cyclone and recycled air handling system is now utilised to manage both the solid particles that are in the heated air post the drying phase to provide improved thermal efficiency and effectiveness of the drying process control.
5. Refer to the updated Fertiliser Management Plan attached at **Appendix B** and the Fertiliser Process and Operational Management Overview attached at **Appendix C**.

2. ODOUR FROM FERTILISER MANUFACTURE

2.1. Issue:

The inputs into manure processing vs fertiliser manufacture are significantly different to that proposed in MCUI/2017/346/A change application:

Inputs from MCUI/2017/346/A (March 2023)				Inputs described MCUI/2017/346/D (May 2026)		
Input Materials	Description	Tonnes/annum		Material	Stored in	Input Location
Gypsum	Fine white powder	4,800		Composted Manure	Bunker	Pug Mill Bin
Rock Phosphate	Fine brown powder	1,200		Meat and Bone Meal	Silo	Pug Mill Bin
Biomass	Woodchip and sawdust	18,500		Gypsum (micronized)	Silo	Pug Mill Bin
				Sulphate of Potash	Silo	Pug Mill Bin
				Lime	Silo	Pug Mill Bin
				Bentonite	Bulk Bags	Pug Mill Bin
				Water	Silo	Pug Mill Bin
				Other Liquid additives	25kg Bags	Pug Mill Bin

High-risk odour sources included in fertiliser manufacture:

- ***Composted manure***
- ***Residual biological activity***
- ***Can release ammonia (NH_3) and reduced sulphur compounds***
- ***Meat and bone meal (MBM)***
    - ***Major odour source when heated***
    - ***Releases ammonia and amines***
- ***Molasses***
    - ***Can ferment → sour/acidic odours if microbes present***

High-risk processing stages that may cause odour emissions include:

1. ***Mixing stage***
    - ***Fresh exposure of MBM + manure + molasses = Immediate odour release***
2. ***Heating / Conditioning (with steam)***
    - ***Peak odour generation = Ammonia + amines volatilise rapidly***
3. ***Pelletising (pug mill)***
    - ***Agitation + heat will releases trapped gases and fresh pellets can off-gas causing odour***
4. ***Drying to 2800C***
    - ***heat will releases trapped gases and fresh pellets can off-gas causing odour***
5. ***Post-process storage***

- ***Warm pellets will continue to emit odours until cooled***

The supporting documentation submitted to date do not clearly assess or quantify odour from the fertiliser manufacturing process.

Information Required:

Submit an odour risk assessment, prepared by a suitably qualified person in air quality and odour impacts, that quantifies odour from the fertiliser manufacturing process and discusses any odour management measures required so odour nuisance at receptors does not occur. This may be included as part of the update to the Air Quality Management Plan noted above (Item 1 of this Information Request) or as a standalone response.

Response

In response to the above item, reference is made to the Odour Risk Assessment, prepared by Katestone Environmental Australia Pty Ltd and attached as **Appendix D**. The Odour Risk Assessment makes the following conclusions:

> *"An odour risk assessment has been undertaken to address an Information Request received from Council regarding the organic manure processing facility as part of the Change Application (Other Change) to allow receipt of manure from other feedlots for composting at the Grassdale Feedlot. No other changes to the Grassdale Feedlot (including the organic manure processing facility) activities are proposed by this application.*
>
> *A site inspection was conducted at the organic manure processing facility to observe operations, assess odour controls, and identify potential odour emission sources. During the inspection, only a subtle odour attributable to processing activities was detected, and only near the granulator and directly beneath the exhaust stack. The odour character differed from the odour associated with the external manure composting area.*
>
> *This observation was expected, as the material being processed comprised of composted manure that had already undergone significant degradation and was therefore relatively low in odour. Given the substantial separation distance to the nearest sensitive receptors (greater than 5.9km), together with the presence of other odour sources from the feedlot, including manure stockpiles and feedlot operations, the risk of off-site odour impacts from the manure processing facility is considered low."*

3. SITE PLANS

3.1. Issue:

Page 3 of the Fertiliser Process Management Plan includes a screen shot of a Factory Layout Site Plan. Further, page 5 of the Fertiliser Process Management Plan includes a screen shot of a Granulation Process flow chart. Both the plan and chart are not provided in a clear resolution for review.

The Process Flow Chart (dwg GRFE-PFD-02, Rev B) included in the Fertiliser Process and Operational Management Overview does not align with the screen shots in the Fertiliser Process Management Plan noted above and does not align with the images in the response to Further Advice received 16 March 2023 under MCUI/201/346/A.

Information Required:

Submit a scaled Fertiliser Manufacturing Site Plan that is clearly labelled and shows all components and processes for the manufacture of fertiliser and for the processing of composted manure. This document

should clearly align with any flow chart provided and show locations of all key inputs, processing lines, storage areas.

Update the Fertiliser Process Management Plan to include clear images of the Granulation Process flow chart on pages 3 and 5.

Response

In response to the above item, refer to the following drawings:

- Process Flow Diagram – As Built, Drawing No. GRFE-PFD-02, Revision 0, dated 16 April 2026; attached to the Fertiliser Process and Operational Management Overview at **Appendix C**.
- Prime Equipment Layout Plan, Drawing No. GRFE-VMP-04, Revision 1, dated 23 June 2026; attached to the Fertiliser Process and Operational Management Overview at **Appendix C**.
- Factory and Pad Plan, Drawing No. GRFE -VWP-05, Revision 1, dated 22 April 2026; attached at **Appendix E**; and
- Factory General Arrangement Plan, Drawing No. GRFE-VMP-06, Revision 1, dated 22 April 2026; attached at **Appendix E**.

SUMMARY

Pursuant to Section 68(1) of the *Planning Act 2016* and Chapter 1, Part 3, Section 13 of the *Development Assessment Rules*, we hereby confirm that this response provides a response to all of the items included in the Information Request. Having regard to the information provided, we request that Council proceed with the assessment of the application.

Should you require any additional information or clarification please do not hesitate to contact the undersigned on phone 07 4632 2535, mobile 0427 875 871 or by email at kim@precinctplan.com.au.

Yours sincerely

Kim Reeve
Precinct Urban Planning