



15 November 2023

**Hon. Leanne Linard MP**

Minister for the Environment &  
the Great Barrier Reef  
Minister for Science, Minister  
for Multicultural Affairs  
1 William Street  
BRISBANE QLD 4000

**Mayor Teresa Harding**

Ipswich City Council  
1 Nicholas Street  
IPSWICH QLD 4305

Sent via email: [environment@ministerial.qld.gov.au](mailto:environment@ministerial.qld.gov.au); [mayor@ipswich.qld.gov.au](mailto:mayor@ipswich.qld.gov.au)  
Cc: Alison Smith, LGAQ CEO [alison\\_smith@lgaq.asn.au](mailto:alison_smith@lgaq.asn.au); [ask@lgaq.asn.au](mailto:ask@lgaq.asn.au)

Dear Minister Linard and Mayor Harding,

We are writing to request the opportunity to meet with you to discuss and initiate collaborative efforts aimed at resolving the odour nuisance concerns raised by residents living close to the Swanbank Industrial Area (**SIA**).

NuGrow is one of nine businesses with approvals for waste operations in the area. Encouragement for industries like ours to facilitate sustainable waste management and create local job opportunities has led to our presence in the SIA. However, land use zoning and housing developments approved since that time by the Queensland Government and Council have naturally brought residents closer to our NuGrow Ipswich (Swanbank) operational site, leading to increased odour concerns.

We've observed that, traditionally, responses to resident concerns involve individual reactions from governments, councils, and political representatives. However, we would like to submit that the current circumstances would be better served by a more coordinated effort across different levels of government and business to address these issues collectively.

To tackle this matter effectively, we propose a joint meeting between NuGrow representatives, Minister Linard and Mayor Harding to discuss the following potential solutions:

- 1. Queensland Government Support for Facility Improvements:** We are committed to meeting new best practices for material processing, as outlined in the Environmentally Relevant Activity (ERA) 53 model operating conditions and best practice environmental management guidelines. However, the associated costs are substantial – currently estimated in the tens of millions of dollars – and it is commercially unviable for NuGrow to invest this amount of money without passing on significant price increases to local government clients which would, in turn, likely be passed on to ratepayers. Financial assistance from the Queensland Government for necessary upgrades will enable a faster transition to improved environmental outcomes while also alleviating the burden on businesses like NuGrow and, in turn, reducing costs for ratepayers.
- 2. Ipswich Council Decision on our Development Application:** We seek a positive resolution on our minor change development application (7213/2014/MAMC/D) submitted to Council over a year ago. Council's refusal of our application delays our ability to proactively improve odour issues at our Ipswich facility. We hope that further time delays and costs associated with court proceedings can be avoided by all parties meaningfully participating in the pending court ordered private mediation. This



will allow NuGrow to progress the essential upgrades and in turn address odour issues collaboratively and at our earliest opportunity.

3. **Department of Environment and Science (DES) Decision on our Transitional Environmental Program Amendment Application:** We seek a positive resolution on our Transitional Environmental Program amendment application submitted to DES over a year ago. DES's refusal of our application delays our ability to improve odour issues at our Ipswich facility. We again hope that further time delays and costs associated with court proceedings can be avoided by all parties participating in the pending court ordered private mediation. This will allow NuGrow to progress the essential upgrades as soon as possible and in turn address the odour issues collaboratively.
4. **Real-Time Tracking and Reporting of Odour Emissions:** NuGrow strongly believes that implementing a proactive and transparent process for detecting and reporting odour emissions is crucial. We support the implementation of a real-time tracking system by the Queensland Government across the SIA to identify and rectify issues promptly.
5. **Collaborative and Coordinated Odour Solutions:** Given the number of potential odour sources in the SIA and the large number of odour complaints received from surrounding communities, a coordinated approach to odour mitigation is proposed. Currently the regulated industries are managed by different teams within DES and compliance is evaluated on an individual basis. A revised approach to consider all odour sources and evaluate the cumulative and individual impacts would go a long way to understanding this complex issue and identifying targeted control measures to improve community outcomes.
6. **Relocation of Operations:** If the above solutions prove unviable, we are open to discussions regarding the relocation of our operations to an alternative industrial site further away from residential homes. For NuGrow to consider such a request, we would need to understand transitional arrangements, approval processes and any financial assistance frameworks on offer.

We believe a similar approach should be extended to other businesses in the SIA.

We appreciate the initiatives already undertaken by the Queensland Government and local governments, such as Ipswich City Council, to establish circular economies. Programs like kerbside Food Organics and Garden Organics (FOGO) collections are vital for waste transformation, and we wholeheartedly support these efforts. However, it is important to understand that we also need the processing facilities to make these initiatives happen. NuGrow has provided significant in-kind support and subsidised costs to support Ipswich City Council, Rockhampton Regional Council and Bundaberg Regional Council roll outs and trials for metropolitan and regional FOGO collection and processing operations.

Thank you for considering our request for a joint meeting. We look forward to hearing from you to arrange a time to discuss viable solutions to deal with the odour issues around the SIA.

Please contact us if you have any questions in the meantime.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Roy Wilson".

**Roy Wilson**

Managing Director

[roywilson@nugrow.com.au](mailto:roywilson@nugrow.com.au)