



# MANILDRA GROUP

*Commitment to Excellence*

## STATEMENT BY SHOALHAVEN STARCHES PTY LIMITED IN ACCORDANCE WITH ORDERS MADE BY THE LAND AND ENVIRONMENT COURT DATED 2 NOVEMBER 2006

### Introduction

Shoalhaven Starches Pty Limited ("Shoalhaven Starches") is the holder of Environment Protection Licence number 883, issued by the NSW Department of Environment and Climate Change ("DECC") (formerly known as the Department of Environment and Conservation (DEC) and Environment Protection Agency (EPA)).

Complaints have been made by members of the community to DECC and to Shoalhaven Starches about odours reported to be emanating from Shoalhaven Starches' factory at Bolong Road, Bomaderry, near Nowra, in NSW.

Following investigation of odour complaints in 2004, DECC successfully prosecuted Shoalhaven Starches in the Land and Environment Court for the emission of offensive odours from its premises.

The Orders made by the Land and Environment Court on 2 November 2006 required Shoalhaven Starches inter alia to engage a suitably qualified person to conduct an environmental audit of Shoalhaven Starches' premises comprising the factory and environmental farm in order to identify all odours generated by the operations and provide recommendations for the prevention of minimisation of the generation of offensive odours from Shoalhaven Starches' premises for the purposes of ensuring no offensive odours, as defined by the *Protection of the Environment Operations Act 1997*, are emitted from Shoalhaven Starches' premises.

The Orders also required Shoalhaven Starches to prepare and submit a Statement identifying what options identified in the environmental audit report, Shoalhaven Starches intends to implement, and by when each such option will be implemented.

This Statement is intended to comply with the Orders made by the Land and Environment Court and set out the options identified in the environment audit report, Shoalhaven Starches intends to implement and when such options will be implemented.

### GHD Recommendations

The environmental audit report prepared by GHD in accordance with the Orders is contained in two volumes entitled "Shoalhaven Starches Environmental Audit Odour Sources October 2007" (the "Report") which accompanies this statement.

The options identified by GHD and recommended for consideration by Shoalhaven Starches are set out in Section 14 – Conclusions and Recommendations, paragraph 14.2 – Recommendations at Pages 127 and 128 of the Report.

In order to assist Shoalhaven Starches, GHD has set out the recommendations made to Shoalhaven Starches in two tables which pertain to:

- procedural and administrative actions (Table 52); and
- Capital and operational areas (Table 53).

These tables are set out at pages 128 to 131 of the Report.

### **Implementation Strategy by Shoalhaven Starches**

The Report prepared by GHD sets out 16 recommendations for consideration by Shoalhaven Starches.

Shoalhaven Starches is committed to ensuring that no offensive odours, as defined by the *Protection of the Environment Operations Act 1997* are emitted from its premises

Shoalhaven Starches has carefully considered each of the recommendations made by GHD in the Report and intends to implement each of the recommendations.

Included with this Statement, is an Implementation Plan in table form which has been prepared by Shoalhaven Starches in accordance with the Orders, and which sets out the implementation strategy proposed by Shoalhaven Starches for implementing the recommendations identified in the Report conducted by GHD and the time by which each item will be implemented.

The Implementation Plan has been prepared in line with the recommendations made by GHD and has been divided into two parts.

The first part deals with Administrative Items identified by GHD and set out in Table 52 of the Report. These items are identified in the Implementation Plan by the letter "A" in the priority column of the table.

The second part deals with items which involve Capital Expenditure which are set out in Table 53 of the Report. These items are identified in the Implementation Plan by the letter "C" in the priority column of the table.

The last recommendation made by GHD takes into account changes in technology and methodologies which may result in Shoalhaven Starches identifying an odour minimization option for a specific source that differs from the recommendation identified in the Report. Where such an option is identified it may be considered as being a suitable control measure provided that it is a sustainable means of odour minimization which meets or better the projected odour emission reductions listed in Tables 48 and 49 in Section 12 of the Report.

Shoalhaven Starches has already commenced the implementation of the recommendations made by GHD and the Implementation Plan sets out those matters which have already been commenced and in some cases, have been completed.

### **Matters which will affect the Implementation Plan**

Shoalhaven Starches does not anticipate or foresee any matters which are within its control which will affect, delay, or impede the completion of the Administrative Items within the time set out in the Implementation Plan.

Shoalhaven Starches recognises that many of the Capital Items identified in the Implementation Plan will involve processes and procedures which are outside the control of Shoalhaven Starches. Such processes and procedures may include:

- identifying and retaining suitable experts;
- undertaking further source specific modelling;
- detailed engineering design;
- approvals and licensing;
- fabrication of equipment;
- supply and installation of equipment.


Delays in completing processes and procedures outside the control of Shoalhaven Starches may affect implementation timing intended by Shoalhaven Starches and set out in the Implementation Plan.

Shoalhaven Starches is also investigating the options which are available for Shoalhaven Starches to use existing waste water treatment plants, including the cost of upgrading those plants, to comply with the recommendations contained within the Report and has already approached Shoalhaven City Council with a proposal in this regard. A copy of Shoalhaven Starches' letter to Shoalhaven City Council dated 18 October 2007 together with the response received from the Council dated 1 November 2007, is included with this Statement. Where agreement is reached with the Council for the treatment of Shoalhaven Starches waste water, the timing and the completion of the upgrade to the Council waste water treatment system is another factor which will be outside Shoalhaven Starches control and may delay the implementation timing intended by Shoalhaven Starches.

### Summary

The Implementation Plan which accompanies this Statement has been prepared by Shoalhaven Starches using its best endeavours to identify the earliest dates by which each recommendation can be practically completed and implemented with the intention of implementing all of the recommendations contained in the Report on or before the dates identified in the Implementation Plan, subject to any matters which are beyond the reasonable control of Shoalhaven Starches.

**DATED: 1 NOVEMBER 2007**



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**John Thomas Honan**  
Chairman

**SHOALHAVEN STARCHES PTY LIMITED**