THOMAS FOODS® INTERNATIONAL

FEEDING FAMILIES GLOBALLY

PROUDLY AUSTRALIAN & FAMILY OWNED SINCE 1988

ENVIRONMENT

ENVIRONMENT IMPROVEMENT PROGRAM
LAGOON ROAD MURRAY BRIDGE

Version 3.0 | November 2025
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CONTENTS

1. EXECUTIVE SUMMARY

This Environment Improvement Program (EIP) prepared by Thomas Foods International Murray Bridge Pty Ltd (TFI Murray Bridge) has been developed for the purpose of confirming site infrastructure, procedural and community consultation improvements and upgrades at the TFI Murray Bridge Road, Murray Bridge facility (the site). These site upgrades and improvements are being undertaken to further investigate and improve air quality (fugitive odour emissions) associated with the current abattoir by-products processing works that are occurring onsite. Once approved by the Environment Protection Authority (EPA), this EIP will be used by TFI Murray Bridge as the basis to demonstrate ongoing improvements in environmental performance at the site which are considered necessary to ensure ongoing compliance with the site environmental authorisation 11649, relevant environment protection policies and the Environment Protection Act 1993 (EP Act).

TFI Murray Bridge remains committed to our environmental obligations and the defined environmental improvement process and has developed a range of deliverables (termed compliance actions) for site improvements and upgrades following ongoing consultation with its neighboring community and all relevant stakeholders including the EPA. The community consultation process that was undertaken by TFI Murray Bridge has been used to support site investigations and focus areas that should be considered for site improvements and upgrades to address fugitive odour emission concerns. The community consultation process undertaken included the following consultation methodology:

- Online survey: this was the key mechanism for collecting community feedback which was distributed to and made accessible online to all Murray Bridge residents and relevant stakeholders.
- Local news article: An article was published in the Murray Bridge news which highlighted the consultation process underway and explained the purpose of the online survey which strongly encouraged all interested local residents to provide factual and detailed feedback associated with any odour concerns.
- Facebook advertising campaign: A targeted social media campaign was undertaken to raise site awareness and direct interested stakeholders to complete the online survey.

A complete copy of the TFI Murray Bridge community consultation and community responses to concerns raised in regard to site operations is provided under **Appendix 1** of this EIP.

The objective of this EIP is to deliver environmental improvement for the Murray Bridge community through the implementation of a number of site infrastructure and procedural improvements focused on reducing the generation of fugitive odour emissions. In response to community and stakeholder feedback, site improvements consider a number of upgrades that are considered necessary to maintain compliance with the site environmental authorisation and EP Act.

These site upgrades and improvements to address fugitive odour emissions are prioritised into the following compliance action themes within the EIP:

- Process Emissions: Reduce odour emission release from the rendering operations via maintenance and optimisation works of the odour collection system and efficiently utilise the existing treatment capacity of the biofiltration system.
- Mechanical Building Air Ventilation: Upon optimisation of the odour collection system and improved capture of process emissions, regulate airflow movement within the key areas of the rendering building, including the save-all (wastewater), cooker and blood areas by designing and installing a mechanical building ventilation system.

- Wastewater Treatment Optimisation: Enhance the efficiency of the wastewater treatment processes to mitigate odour emissions from effluent handling and processing systems.
- Wastewater Trenches & Steam Lines: Replace the existing open wastewater trenches with a piping-based system to avoid unnecessary exposure and volatile release of odour during wastewater transfer activities.

2. TRACKING AND REFERENCE INFORMATION

Tracking and Reference Information	
Document Number	Document Reference ID: MBR_11649_EIP_2025_V3
Document Date	13 November 2025
Licensee & ACN	Licensee: Thomas Foods International Murray Bridge Pty Ltd Registered Address: Lagoon Road, Murray Bridge SA 5253 ACN: 085 672 457
EPA Authorisation Number	EPA Environmental Authorisation 11649
Site Location	Site Address: Lagoon Road, Murray Bridge SA 5253. Certificate of Title (CT) Reference Details: – CT 5482/686 – CT 5659/268 – CT 5659/270 – CT 5659/272 – CT 5928/682 – CT 6079/82 – CT 6171/222 – CT 5313/664 – CT 5313/663 – CT 5659/271 – CT 5928/681 – CT 6079/79 – CT 6079/80
Document Author	Thomas Foods International Murray Bridge Pty Ltd

3. GENERAL DESCRIPTION

3.1 Brief

Established in 1988, Thomas Foods International (TFI) Pty Ltd has grown from small beginnings to become one of Australia's largest family-owned food businesses. Under the leadership of Managing Director, Darren Thomas, and with teams in Australia, the US, Canada, Korea, the UK, China, Japan and Europe, the TFI brands and business partnerships grow, supply and distribute premium meat and seafood to more than 85 countries around the world.

On 3 January 2018, the existing TFI Murray Bridge beef and lamb production facility, located on Lagoon Road Murray Bridge (the site), was heavily damaged by fire and ceased any further abattoir production from this date. Since that time, TFI have completed the planning and construction of a new purpose-built beef processing facility on a greenfield site situated approximately 8 kms North of the Murray Bridge township located at Temora Way, Pallamana.

The site has continued reduced processing operations since the fire and operates a rendering production facility which processes a range of abattoir by-products into commodity items including blood & meat meals and a range of high-grade tallow products which are sold domestically and overseas. The site also operates ancillary activities onsite including a wastewater treatment plant, a small scale skins salting facility and supporting warehousing & logistics.

The main site operations being undertaken by TFI Murray Bridge at the site include:

- Rendering and fat extraction of abattoir by-products:
  - Sheep and lamb (ovine) by-products received and processed from TFI small stock abattoirs located in Lobethal South Australia and Stawell Victoria.
  - Beef (bovine) by-products processed from TFI beef abattoir located in Pallamana South Australia.
- Salting and processing of skins generated from TFI small stock abattoirs located in Lobethal South Australia and Stawell Victoria.
- Wastewater treatment of effluent generated from rendering processing works collected as part of daily by-product processing activities.

3.2 Environmental Authorisation Compliance

TFI Murray Bridge operates the site in accordance with the EPA environmental authorisation 11649 and conducts the following prescribed activities of environmental significance as outlined under Schedule 1 Part A of the EP Act:

- 6(1) Meat Processing Works
- 6(7) Rendering of Fat Extraction Works
- 8(2)(a) Fuel Burning Not Coal or Wood

The most recent version of EPA environmental authorisation 11649 was issued on 1 July 2023, was further amended on 19 March 2025 and has an expiry date of 30 June 2028.

TFI Murray Bridge has a general environmental duty which states a person must not undertake an activity that pollutes, or might pollute, the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm.

The following environmental authorisation conditions below relate to the requirement for TFI Murray Bridge to develop an EIP to address air quality (fugitive odour) concerns that have been raised by the EPA and community members who live adjacent to the site.

The condition of the environmental authorisation issued to TFI Murray Bridge requiring the development of and compliance with an EIP outlines the following requirements:

1 Control of Emissions

1.1 Environment Improvement Program (U-1722)

The Licensee must

1.1.1 having regard to the Odour Assessment Report develop to the reasonable satisfaction of the EPA and Environment Improvement Program (EIP) which contains requirements for the purpose of preventing or minimizing the emissions of odours from the premises:

1.1.2 for the purpose of clause 1.1:

a. include in the EIP

i. particular measures that must be undertaken by the Licensee to prevent or minimize the emission of odours from the premises

ii. dates by which each of the measures referred to in subclause a.i must be undertaken

iii. a process by which (and criteria by which) the effectiveness of the measures referred to in subclause a.1 must be measured by the Licensee

iv. a framework under which the Licensee must report to the EPA on the progress, completion and effectiveness of the measures referred to in subclause a.i, including the times at or by which must be made

v. criteria by which, having regard to the effectiveness of the measures referred to in subclause a.i, the Licensee will be required to amend the EIP to the reasonable satisfaction of the Authority

vi. details as to how and when public access to the EIP will be provided by the Licensee

b. submit a draft EIP to the EPA on or before the compliance date stated below.

c. Upon receipt of written notice by the EPA, make any amendments to the draft EIP that are reasonably required by the EPA, and submit a revised version of the EIP to the EPA for its approval by a date reasonably specified by the EPA in the notice or a date otherwise agreed between the EPA and the Licensee

1.1.3 undertake a public consultation in the course of developing the EIP and submit to the EPA, on or before the compliance date stated below (either in the body of a draft or by separate document) a summary of:

a. the feedback received during the course of public consultation

b. how that feedback has been considered and addressed in the development of the EIP

1.1.4 comply with the requirements of the EIP which has been approved in writing by the EPA (or any revised EIP approved in writing by the EPA)

Compliance Date: 4 April 2025

3.3 Intent

The intent of the EIP is to deliver environmental improvement for the Murray Bridge community through the implementation of a number of site infrastructure and procedural improvements to reduce the generation of fugitive odour emissions at the site.

Following the completion of a number of site odour investigations and direct monitoring onsite a targeted odour mitigation plan has been developed by an independent air quality specialist for the site. The odour mitigation plan recommendations have been reflected within the current EIP which are focused on targeting the onsite rendering operations and the wastewater handling activities, specifically the wastewater transfer circuits.

The odour mitigation plan and supporting EIP has been developed with the aim of capturing and addressing the following design themes/objectives:

- **Process Emissions:** Reduce odour emission release from the rendering operations via maintenance and optimisation works of the odour collection system and efficiently utilise the existing treatment capacity of the biofilter system. The biofilter system has been confirmed to be able to accommodate additional increases in odour concentration loadings for treatment purposes.
- **Mechanical Building Air Ventilation**: Upon optimisation of the odour collection system and improved capture of process emissions, regulate airflow movement within the key areas of the rendering building, which includes the save-all (wastewater), cooker and blood processing areas by designing and installing a mechanical building ventilation system that can achieve the following outcomes:
    - Promoting improved air quality within these areas by increasing the supply of fresh dilution air;
    - Improve initial plume release and dispersion via point source discharge and ensure that there is a new inflow of fresh air supply at targeted areas. This will significantly reduce ground level fugitive emissions;
    - Identify the level of controlled openings required for fresh air supply to support the efficient functioning of a proposed mechanical building ventilation air extraction system. This will assist with promoting optimal airflow mixing and crossflow within the targeted areas; and
    - Sealing all uncontrolled openings not identified to be required as part of the functioning of the proposed mechanical building ventilation air extraction system.
- **Wastewater Treatment Optimisation**: Enhance the efficiency of wastewater treatment processes to mitigate odour emissions from effluent handling and transfer systems (this will be predominantly captured under a separate wastewater detailed design process underway onsite).
- **Wastewater Trenches & Steam Lines**: Replace the existing open trenches with a piping-based system to avoid unnecessary exposure and volatile release of odour during wastewater transfer activities. This will reduce the overall exposed surface area from the wastewater transfer activities and the uncontrolled release of odours from these areas.

3.4 Site Map


Gawler
Adelaide
Murray Bridge
Flinders Range
A13
ennovo
Legend
Site Location
Site Boundary
Blender Facility
WWTP
0 30 60 120
1:5,000m
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THOMAS FOODS INTERNATIONAL
MURRAY BRIDGE
SITE PLAN
SITE BOUNDARY AND SITE LAYOUT
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4. EIP COMPLIANCE ACTIONS

TFI Murray Bridge has committed to undertaking a number of site improvement actions to demonstrate compliance with the EP Act and the site EPA environmental authorisation 11649. The compliance actions listed below are reflective of the comprehensive site environmental and engineering investigations undertaken at the site and the recommended site improvements and deliverables through which TFI Murray Bridge will demonstrate compliance with the condition U-1722 of environmental authorisation 11649. Each compliance action listed will be tracked, monitored, delivered and reported in line with the site implementation program and constructed to the design requirements outlined under each of the captured compliance actions.

Where compliance actions have committed to the delivery of an As-built Report (with independent verification), these reports will document all works undertaken at the site inline with the agreed site improvement scope. The As Built Report will include details and evidence regarding how the completed works were undertaken in accordance with the proposed scope of works, plans, detail any variance to the proposed plans, and provide explanation as cause of variances and how the desired performance outcomes were still achieved.

Compliance Action 1	
Action Required	**Planning and Licensing Approvals**
Compliance Date	**Planning Application Submission – Within 8 weeks from the date of EIP approval** **EIP Update – Within 14 days of receiving planning approval (21 November 2025)**
Description	– TFI has sought independent planning advice on all proposed site improvements and upgrades to confirm if any development approval requirements exist at the site. Any planning requirements and associated compliance action delivery delays have been addressed under each compliance action within the EIP – A development application that is required for all site operational improvements and upgrades will be prepared and submitted to the relevant planning authority within 8 weeks from the date of final EIP approval – Any site operational improvements and upgrades that do not require development approval will be captured under a process change application that will be issued to the EPA for approval. Following EPA approval, site works will occur inline with the nominated timelines outlined in each of the compliance actions

Compliance Action 2	
Action Required	**Review and Restoration of the Biofiltration Odour Control System**
Compliance Date	**Site works - 15 August 2025** **As Built Reporting – 12 September 2025**
Description	– TFI will undertake a review of the existing biofiltration extraction system and complete the following actions: o Prepare an inventory of all operational/non-operational air capture and extraction equipment o Identify any further air quality capture and extraction opportunities within the processing buildings and return these back into the biofiltration system o Restore any odour control equipment/ducting back to the original biofiltration design o Fabricate any new air capture hoods/pipework and install as necessary o Identify and return any disconnected or sub-optimally connected processed units are connected back into the biofiltration extraction system – Planning advice has been sought from an independent planning specialist which has confirmed that no planning approvals are required for review and/or reinstatement of the existing biofiltration extraction system – A summary report will be developed outlining the status of the existing biofiltration extraction system and any modifications required to occur onsite – All biofiltration extraction system odour control improvements and upgrades that are undertaken will be confirmed within an As Built report which documents all investigations & works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of site upgrade works – Should any delays occur to the biofiltration odour control system program: o TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works timeline o Accompanying any notification to the EPA of any delays to the agreed works timeline, TFI will confirm revised timing for completion of site works and issue a revised works timeline to the satisfaction of the EPA

Compliance Action 3	
Action Required	**Improved Building Containment – Main Cooker Processing Building**
Compliance Date	**Site Works - 2 January 2026** **As Built Reporting - 30 January 2026**
Description	– TFI will regulate airflow movement through improved cooker building containment to better capture odours generated for treatment via the biofiltration air extraction system and the mechanical ventilation air extraction system to be installed – To achieve improved building containment and air flow regulation TFI will undertake the following: o Seal all existing building openings and review further containment opportunities to enhance odour control and management o Existing openings located in the side of the building will be sealed using galvanised purlins and powder coated sheet steel o Existing openings in the roof of the building will be sealed using galvanised purlins and powder coated sheet steel o Custom made galvanised flashing will be installed to completely seal the area between the roofing and existing brick wall o Stainless steel flange channels will be installed to create a framework for installation of 3m x 3m heavy duty industrial roller door at the current side open air access area

	○ Expandable foam will be used to seal any smaller gaps to ensure appropriate containment and prevent any further odorous air escape ○ Controlled opening locations required for fresh air supply to support the efficient functioning of the mechanical building ventilation air extraction system will be confirmed and directed for installation via the independent air quality expert (if required) – Planning advice has been sought from an independent planning specialist which has confirmed that no current planning approvals are required for: ○ Sealing of minor openings that are not structural in nature and are not significant in size ○ Replacement (like for like) of controlled openings (ie roller doors that have been previously removed) – All main cooker building improvements and upgrades that are undertaken will be confirmed within an As Built report which documents all works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of completion of site upgrade works – Should any delays occur to the main cooker processing building program: ○ TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program ○ Accompanying any notification to the EPA of any delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 4	
Action Required	**Improved Building Containment – Blood Processing Building**
Compliance Date	**Site works - 2 January 2026** **As Built Reporting - 30 January 2026**
Description	– TFI will regulate airflow movement through improved blood processing building containment to better capture odours generated for treatment via the biofiltration air extraction system and the mechanical ventilation air extraction system to be installed – To achieve improved building containment and air flow regulation TFI will undertake the following: ○ Seal all existing building openings and review further containment opportunities to enhance odour control and management ○ Existing openings located along the front of the building will be sealed using galvanised purlins and powder coated sheet steel ○ Existing openings in the roof of the building will be sealed using galvanised purlins and powder coated sheet steel ○ Custom made galvanised flashing to be installed to completely seal the area between the roofing and existing brick wall ○ Stainless steel-flange channels will be installed to create a framework for installation of a heavy-duty industrial roller door at the current front open air access area ○ Expandable foam will be used to seal any smaller gaps to ensure appropriate containment and prevent any further odorous air escape ○ The existing window will be completely sealed with powder coated sheet steel ○ Controlled opening locations required for fresh air supply to support the efficient functioning of the mechanical building ventilation air extraction system will be confirmed and directed for installation via the independent air quality expert (if required)

	– Planning advice has been sought from an independent planning specialist which has confirmed that no current planning approvals are required for: o Sealing of minor openings that are not structural in nature and are not significant in size o Replacement (like for like) of controlled openings (ie roller doors that have been previously removed) – All blood processing building improvements and upgrades that are undertaken will be confirmed within an As Built report which documents all works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of completion of site upgrade works – Should any delays occur to the blood processing building program: o TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program o Accompanying any notification to the EPA of any known or envisaged delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 5	
Action Required	**Improved Building Containment – Save-All (Wastewater) Processing Building**
Compliance Date	**Site Works – 2 January 2026** **As Built Reporting – 30 January 2026**
Description	– TFI will regulate airflow movement through improved save-all (wastewater) building containment to better capture odours generated for treatment via the biofiltration air extraction system and/or the mechanical ventilation air extraction system to be installed – To achieve improved building containment and air flow regulation TFI will undertake the following: o Seal all existing building openings and review further containment opportunities to enhance odour control and management o New purlins and beams will be installed to support complete roof replacement with powder coated roof sheeting o New galvanised roof beams, stiffeners and purlin brackets will be installed along the roof structure o Custom made galvanised flashing to be installed to completely seal the area between the roofing and existing brick wall o Expandable foam will be used to seal any smaller gaps to ensure appropriate containment and prevent any further odorous air escape o Controlled opening locations required for fresh air supply to support the efficient functioning of the mechanical building ventilation air extraction system will be confirmed and directed for installation via the independent air quality expert (as required) – Planning advice has been sought from an independent planning specialist which has confirmed that planning approvals are required for: o Replacing the structural components of the existing roof structure which includes new purlins, stiffeners and roof beams to support roof replacement – All save-all (wastewater) building improvements and upgrades that are undertaken will be confirmed within an As Built report which documents all works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of completion of site upgrade works – Should any delays occur to the save-all processing building program:

	○ TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program ○ Accompanying any notification to the EPA of any known or envisaged delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 6	
Action Required	**Installation of Mechanical Building Ventilation Fans**
Compliance Date	**Site Works – 2 January 2026** **As Built Reporting – 30 January 2026**
Description	– TFI will install a roof mounted mechanical building ventilation air extraction system to centralise airflow movement within the processing buildings using strategic process areas as fresh make-up air supply points. The building ventilation air extraction system will be installed to achieve the following performance outcomes: ○ Desing airflow extraction rate to be based upon achieving a new inflow of fresh air supply to the processing building and confirmed by an independent air quality expert ○ Centralised airflow to target odour accumulation of fugitive emissions within high odour areas (main cooker, save-all and blood processing buildings) ○ Fresh air supply points will be designed to draw fresh air supply via engineered and/or designed air openings ○ Manufacture and install custom steel brackets to support and house the new mechanical extraction fans in the selected roof locations as directed by the independent air quality specialist ○ Install 4 mechanical building ventilation air extraction fans with vertical discharge configuration into the advised locations by the independent air quality specialist ○ Performance building airflow extraction target rate of 15 air changes per hour – Planning advice has been sought from an independent planning specialist which has confirmed that planning approvals are likely required for: ○ Installing roof mounted extraction fans that exceed 100kg and are installed within the ceiling space – All mechanical fan installation improvements and upgrades that are undertaken will be confirmed within an As Built report which documents all works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of completion of site upgrade works – Should any delays occur to the mechanical building ventilation fan installation program: ○ TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program ○ Accompanying any notification to the EPA of any delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 7	
Action Required	**Enclosing Open Wastewater Trenches and Steam Lines**
Compliance Date	**Site works - 15 August 2025** **As Built Reporting – 12 September 2025**
Description	– TFI will upgrade the existing exterior open-air wastewater and steam line trenches through sealed pipe installation to minimize odour emissions from the wastewater effluent transfer circuit to the save-all (wastewater) building – Upgrade of the open-air wastewater trenches will provide improved wastewater containment which will significantly reduce the risk associated with odour emission during wastewater transfer – To achieve improved wastewater handling and containment TFI will undertake the following: o Manufacture and install stainless steel end plates to seal the existing open air wastewater inlet trenches o Connect stainless steel tubes and fittings to completely enclose the wastewater transfer channels and prevent any odorous air escaping the sealed system o Installed stainless steel pipework consisting of nominal 200mm diameter pipe which will transfer wastewater directly to the save-all (wastewater) building – Planning advice has been sought from an independent planning specialist which has confirmed no planning approvals are required for: o Installing wastewater pipework that is underground, in trenches that do not require retaining walls exceeding 1 metre in height – All open-air wastewater trench and steam line upgrades that are undertaken will be confirmed within an As Built Report which documents all works undertaken at the site. This will be independently verified by the site air quality specialist engaged to provide specialist odour control advice and issued to the EPA within 4 weeks of successful completion of completion of site upgrade works – Should any delays occur to the wastewater trench and steam line program: o TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program o Accompanying any notification to the EPA of any delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 8	
Action Required	**Process Optimisation of Odour Collection & Control System**
Compliance Date	**Odour system control improvement investigations – 27 February 2026** **Odour system control improvement reporting – 27 March 2026** **Odour performance assessment works:** – **Stage 1 – 13 March 2026** – **Stage 2 (if required) – 24 April 2026**
Description	**Odour Collection & Control System Optimisation** – TFI will undertake the following regarding the odour system control improvements: o Conduct a biofiltration treatment evaluation study with the objective of optimising the existing biofiltration odour control system o Evaluate building air capture and differential pressures following completion of site improvements and upgrades. This will include smoke testing inside the processing buildings surrounding the centralisation of airflow management, installation of mechanical roof fans, and improved

	sealing and containment of the rendering processing buildings (save-all, cooker and blood processing areas) ○ Further identify any odour fugitive emissions or uncontrolled odour sources and provide further advice/recommendations for site improvements ○ Identify and confirm location of internal mixing fans for installation to optimise airflow movement within the process buildings and maximise operator comfort as far as reasonably practicable ○ Review the air exchange rates for each processing building based on its potential in minimising fugitive emission release ○ Provide recommendations regarding site improvements and upgrades based on the current infrastructure and baseline mode of operation ○ Prepare a final report that outlines the documented process and recommendations for site odour control system improvements that will be issued to the EPA within 4 weeks of successful completion of completion of process and odour optimisation works **Odour Performance Assessment** – TFI will also undertake further odour performance assessment works, via an independent air quality specialist, following the successful completion of site upgrade works. Stage 1 works will include: ○ Repeat of site odour surveys to record odour levels at the site ○ Repeat dispersion modelling based upon odour samples collected as part of the odour control system balancing and performance review ○ Report on site odour surveys and modelling works under an odour performance assessment report ○ All reporting will be complete and submitted to the EPA within 10 weeks of successful completion of site upgrade works ○ Should further investigation and assessment works be required, Stage 2 works will be undertaken – Stage 2 works will include: ○ Repeat field odour surveys ○ Report on additional field odour surveys and update odour performance assessment report ○ All reporting will be complete and submitted to the EPA within 6 weeks of successful completion of Stage 1 investigation works – Should site improvements and upgrades be identified as not achieving odour control outcomes, an updated EIP will be prepared and submitted to the EPA outlining the proposed site improvements and associated timelines for completion – Should any delays occur to the process optimization of odour collection and control system program: ○ TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program ○ Accompanying any notification to the EPA of any delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 9	
Action Required	**Community Consultation EIP Updates**
Compliance Date	**Community Consultation - Commencement will occur from the date of EIP approval** **Final Completion Reporting – 24 April 2026**
Description	– Public access to the EIP will be made available on the TFI website within 2 weeks from the EPA issuing formal approval of the EIP – Following EIP approval, TFI will continue a targeted community progress update which will be issued to all interested stakeholders that prepared a submission to the community consultation process undertaken in Murray Bridge. This targeted community progress update will include: o Website updates – all relevant information regarding EIP site improvements and upgrades will be updated at 3 monthly intervals, from the date of EPA issuing formal approval of the EIP, on the TFI website which will provide all interested stakeholders with access to all recent site developments o Email communication – TFI will provide 2 monthly updates, from the date of EPA issuing formal approval of the EIP, to all survey respondents and any other interested community stakeholders to keep them informed about site progress in line with the EIP – A final EIP completion report will be prepared and circulated to all interested stakeholders, including the EPA, and uploaded to the TFI website within 4 weeks of completion of all site improvements, upgrades and reporting requirements outlined under the EIP. The final EIP report will include: o An overview of site odour investigation and assessment works undertaken as part of the EIP development o An overview of site improvement and upgrades works undertaken at the site inline with the approved EIP o An overview of the community consultation and engagement works undertaken as part of the EIP development and final delivery o Any proposed ongoing community consultation and engagement following successful completion of all requirements under the EIP – Should any delays occur to the community consultation and engagement program: o TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays occur to the agreed works program o Accompanying any notification to the EPA of any delays to the agreed works program, TFI will confirm revised timing for completion of site works and provide a revised works program to the satisfaction of the EPA

Compliance Action 10	
Action Required	**Develop and Submit an Odour Management Plan (OMP)**
Compliance Date	**Odour Management Plan – 30 January 2026**
Description	– The purpose of the OMP is to provide a working document that captures and documents all site work activities, operations, procedures and maintenance requirements relevant to the site's odour performance. The OMP will include an odour management strategy and a site action/implementation plan to capture and document the compliance actions as part of the EIP implementation at the site – TFI will develop and submit a comprehensive OMP to the EPA that details the following detail: o Compliance with EPA environmental authorisation 11649 o Development of standard operating procedures in each key processing area to mitigate fugitive odour generation and possible release o Highlight critical odour emissions risk and control points

	○ Outline controls to be implemented to minimise odour generation for site activities to ensure that nuisance odour beyond the site boundary is controlled ○ Outline key staff responsibilities with respect to odour management onsite ○ Outline the process and methodology to be undertaken for further site odour monitoring surveys and odour dispersion modelling to be undertaken following completion of site upgrades ○ Confirm further odour control system balancing/performance review requirements ○ Integration/consolidation of all existing environmental documentation with respect to odour management onsite – The OMP has been recommended by the independent air quality specialist to be prepared and drafted in parallel to implementation of all the site improvements and upgrades at the site – TFI will submit the OMP to the EPA for review and approval within 4 weeks upon successful completion of site upgrade works. Any comments received from the OMP will be reviewed and updated in the OMP within 4 weeks and reissued for approval to the satisfaction of the EPA prior to implementation at the site – Should any delays occur to preparation and submission of the OMP: ○ TFI will provide the EPA a minimum of 14 days' notice if any known or envisaged delays are to occur to the agreed submission timeline ○ Accompanying any notification to the EPA of any delays to the agreed works timeline, TFI will provide a revised works program for OMP submission to the satisfaction of the EPA

5. REFERENCE DOCUMENTATION

In preparing and developing this EIP, TFI Murray Bridge has considered and adopted detail from the following relevant documentation listed below.

Regulatory Documentation

- Environment Protection Act 1993.
- EPA Environmental Authorisation 11649 issued on 1 July 2023 to Thomas Foods international Murray Bridge Pty Ltd.
- EPA Guidelines (EPA 420/04) 'Environment Improvement Programs – a drafting guide for licensees' re-issued September 2004.

Technical Documentation

- SLR Consulting Australia 'TFI Murray Bridge Field Observation Odour Surveys – Odour Assessment Report 1 Project No 650.030069 Revision 1.0' dated 4 October 2024.
- SLR Consulting Australia 'TFI Murray Bridge Odour Source Significance Assessment (Preliminary) – Odour Assessment Report 2 Project No 650.030069 Revision 1.0' dated 4 October 2024.
- SLR Consulting Australia 'Technical Memorandum TFI Murray Bridge Odour Assessment – Results Odour Sampling Report 3 Project No 650.030069 Revision 1.0' dated 28 November 2024.
- SLR Consulting Australia 'TFI Murray Bridge Air Dispersion Modelling – Odour Assessment Report 4 Project No 650.030069 Revision 1.0' dated 6 December 2024.
- The Odour Unit 'Technical Memorandum Murray Bridge Facility – Odour Control Engineering Advice Job No N2101-01' dated 9 January 2025.

Community Consultation Documentation

- Thomas Foods International 'Community Consultation Report: Environmental Concerns and Odour Emissions at Lagoon Road Facility Version 1.2' dated March 2025

6. SUBMISSION

Submission Details	Approval Details
	
Name: Tom Davies	Name: Shaun Thomas
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Date: 14. 11. 2025	Date: 17/11/2025

ENVIRONMENT PROTECTION AUTHORITY

THIS IS THE APPROVED EIP

REFERRED TO IN CONDITION U-1722

OF EPA AUTHORISATION NUMBER 11649

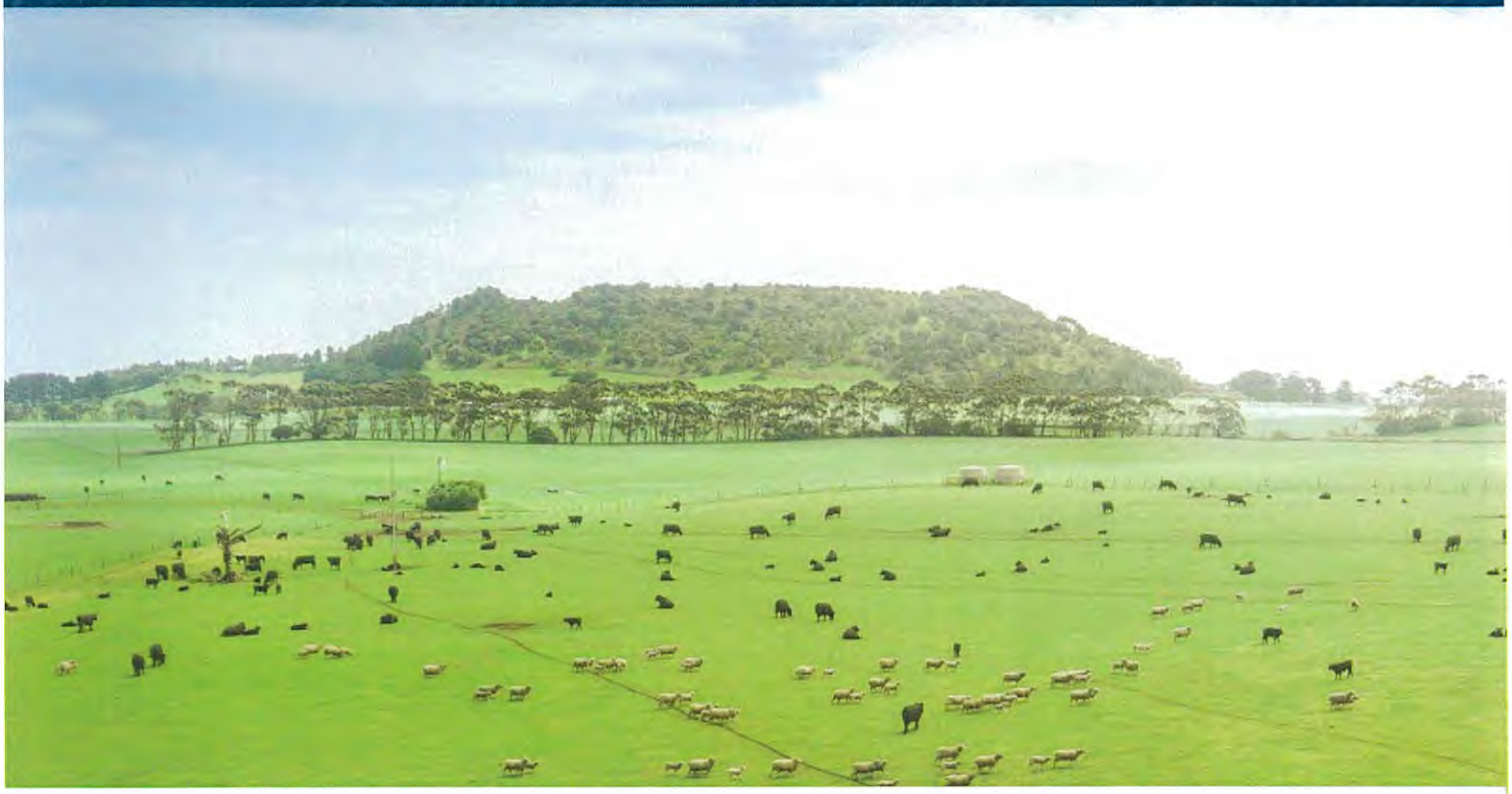
DELEGATE Shaun Thomas  **DATE** 17/11/2025
Principal Adviser Compliance

APPENDIX 1 – COMMUNITY CONSULTATION

THOMAS FOODS® INTERNATIONAL

FEEDING FAMILIES GLOBALLY

PROUDLY AUSTRALIAN & FAMILY OWNED SINCE 1988



ENVIRONMENT & SUSTAINABILITY

Community Consultation Report: Environmental Concerns and Odour Emissions at Lagoon Road Facility

Version 1.2 | March 2025
Document uncontrolled when printed

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1. INTRODUCTION

1.1. PURPOSE OF THE REPORT

This report provides a comprehensive summary of the community consultation process undertaken to gather feedback regarding environmental concerns and odour emissions from the Thomas Foods International (TFI) Lagoon Road Facility. As part of TFI's ongoing commitment to environmental responsibility and regulatory compliance, this consultation was conducted to ensure transparency, engage the local community, and incorporate their feedback to help guide and inform any site procedural and infrastructure upgrades and have this reflected within the Environmental Improvement Programme (EIP) that is currently under development.

The findings presented in this report offer a detailed account of community concerns, perceptions, and insights into odour emissions, their frequency, and their impact on daily life. The consultation was designed to provide residents with an opportunity to voice their concerns and suggestions while allowing TFI to better understand and address any perceived or actual environmental impacts associated with its operations.

The report aims to:

- Summarise the consultation process, including engagement activities and participation rates.
- Provide an in-depth analysis of community feedback regarding odour emissions.
- Outline the immediate and long-term actions TFI will take in response to the feedback received.
- Demonstrate how TFI is ensuring compliance with regulatory requirements while fostering positive relationships with the local community.

1.2. REGULATORY CONTEXT

TFI operates under Licence No. 11649, re-issued on 26 September 2024, which outlines specific environmental management obligations, including public consultation as part of the EIP. The regulatory and licensing framework mandates that TFI:

- Actively engage with the public and seek feedback regarding the facility's environmental performance.
- Provide a detailed summary of community concerns and issues raised.
- Demonstrate how community feedback is being considered and incorporated into operational and environmental management plans.
- Ensure continuous transparency in reporting environmental management practices, odour mitigation efforts, and future improvements.

These requirements are aligned with broader environmental regulations that aim to promote accountability and foster a collaborative approach between industry operators and local communities. By conducting this consultation process, TFI ensures that its operations remain compliant with regulatory obligations while also demonstrating a commitment to environmental stewardship.

1.3. CONSULTATION OBJECTIVES

The consultation process was designed to achieve the following key objectives:

- **Identify and document environmental concerns** raised by local residents and stakeholders, particularly regarding odour emissions.
- **Assess the frequency, intensity, and nature of odour emissions** as reported by community members.

- **Gather input on community engagement preferences** and identify preferred methods for ongoing communication.
- **Ensure that public feedback is accurately reflected** in TFI's environmental management strategy and EIP development.
- **Demonstrate TFI's proactive approach** in engaging with the local community and taking appropriate actions based on received feedback.

By incorporating community perspectives, TFI aims to ensure that any concerns are acknowledged and addressed through practical, transparent, and effective odour management initiatives.

2. CONSULTATION METHODOLOGY

2.1. ENGAGEMENT ACTIVITIES

TFI conducted a **community survey** as the primary method for gathering feedback on odour emissions and environmental concerns. To ensure broad community participation, a range of **promotional activities** were implemented to drive awareness and encourage residents to complete the survey.

2.1.1. PRIMARY DATA COLLECTION METHOD

- **Online Survey:** The key mechanism for collecting feedback was an **online survey**, designed to capture community insights on odour emissions, their frequency, intensity, and impact. The survey was accessible online and served as the main tool for data collection.

2.1.2. AWARENESS AND ENGAGEMENT ACTIVITIES

To maximize participation in the survey, TFI used multiple outreach methods to inform the community and encourage engagement:

- **Facebook Advertising Campaign:** A targeted social media campaign was launched to raise awareness and drive traffic to the survey. This campaign reached **13,923 unique individuals**, generating **54,957 impressions**. The campaign successfully engaged the community, resulting in **1,113 interactions** and **3,317 direct clicks** on the survey link. An example of how the campaign advert appeared in the Facebook feed of targeted users to drive engagement in the survey is below (figure 1). Based on an estimated total (all ages) population of 22,901 people (https://home.id.com.au/) we are confident the survey reached a satisfactorily significant cohort of the Murray Bridge population to ensure all residents had a chance to participate in the survey.
- **Local News Article:** A feature article was published in *Murray Bridge News* on **12 February 2025**, highlighting the consultation process, explaining the purpose of the survey, and encouraging residents to participate.
- **Direct Survey Access:** Recognizing that some community members may not use social media, TFI provided **alternative access points** to the survey. These included **email invitations, direct outreach, and collaboration with local organizations** to ensure that residents were aware of the survey and could easily participate.

Figure 1 An example of how the Facebook advert appeared in the user feed to drive awareness of the research campaign.

By combining **a structured survey with a multi-faceted awareness campaign**, TFI ensured that residents had the opportunity to share their feedback in an informed and accessible manner.

2.2. PARTICIPATION RATE

Of the nearly 14,000 people reached by the advertising campaign, 378 individuals initially expressed interest in completing the survey, and 123 participants ultimately provided their name, which was the first mandatory data collection question.

The second survey question required participants to provide their residential address to verify that responses came from individuals within the target area. Some participants chose to exit the survey at this stage, further reducing response numbers.

As participants progressed, some voluntarily chose to discontinue the survey. This explains the gradual decline in response rates across different survey questions.

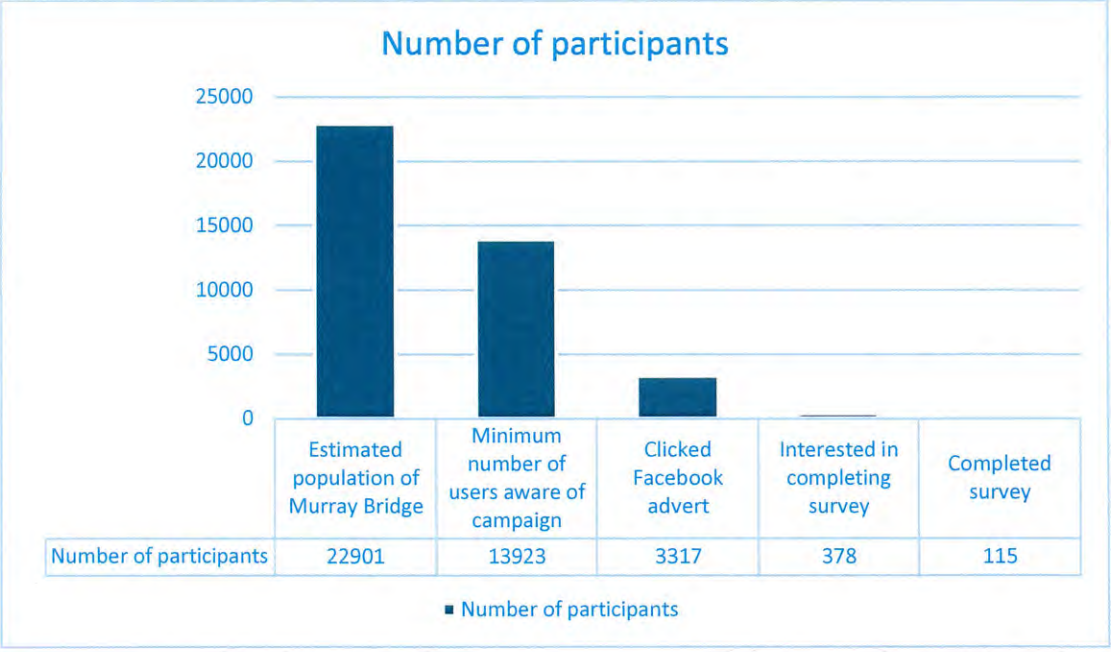


Figure 2 A summary of survey awareness, advert engagement and survey completion relative to population size.

During the data review process, three responses were removed as they originated from individuals outside the Murray Bridge area. This measure ensured that the dataset accurately reflected feedback from those directly impacted by the facility.

Despite broad outreach efforts and high visibility, participation levels declined at each stage of the process. Of the 3,317 individuals who clicked the survey link, only 378 formally indicated interest, and ultimately, 115 fully completed the survey.

This trend suggests that those who participated were primarily individuals with strong opinions on the odour issue, many of whom may have already expressed their concerns through other channels before engaging in the survey. Overall, the results indicate that only a small fraction of the broader community is actively concerned about the facility's impact.

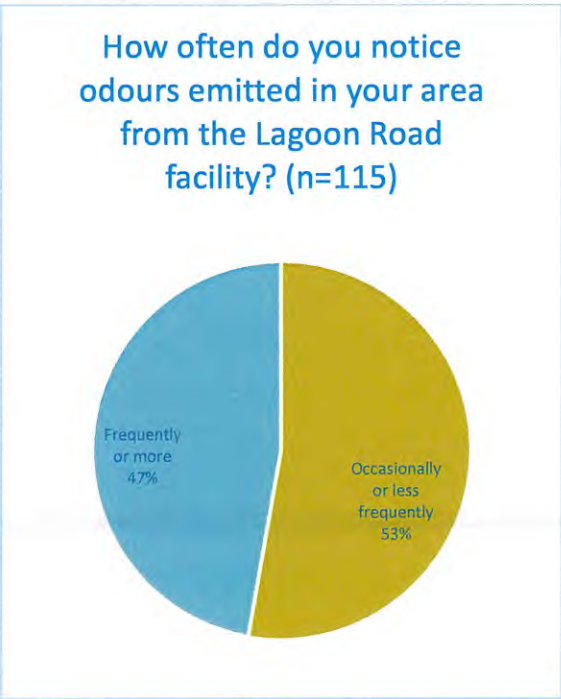
The combination of a targeted Facebook campaign, a local news article, and alternative survey access methods ensured that the consultation process was inclusive, widely visible, and accessible to a diverse range of residents.

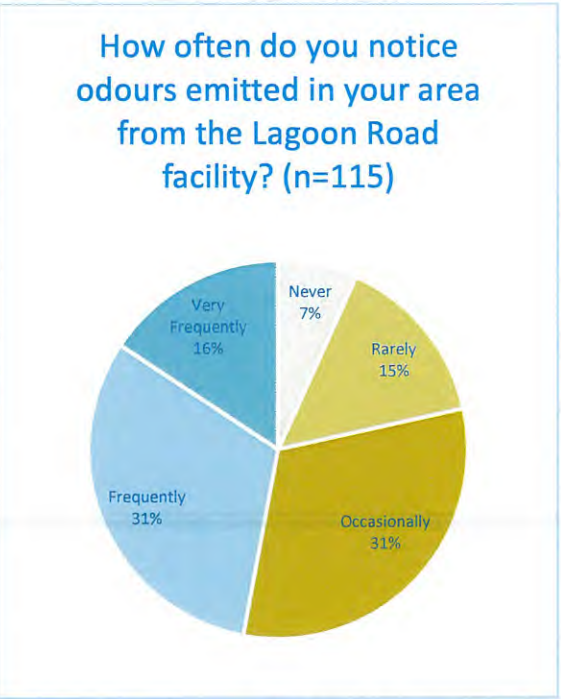
3. COMMUNITY FEEDBACK SUMMARY

3.1. ODOUR EMISSIONS

3.1.1. FREQUENCY OF ODOUR PERCEPTION

Of the **respondents** who answered this question, only **54 individuals (47%)** reported noticing odours frequently or very frequently. The remaining **61 respondents (53%)** reported noticing odours either occasionally, rarely, or never.





This data indicates that a **majority of respondents do not perceive odour as a frequent issue**, with most individuals reporting only occasional or rare instances.

3.1.2. ODOUR DESCRIPTION

Respondents described odours using the following terms (multiple selections allowed):

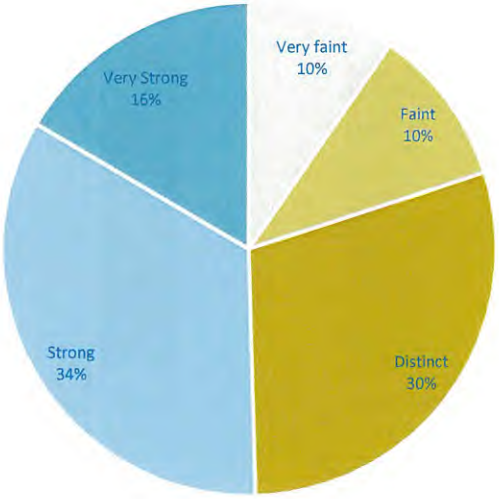
The following is a summary of the odour descriptions provided in the responses when they selected 'other' as their response:

1. **Rotting Meat & Offal** – Many respondents described the odour as similar to decaying meat, rotting carcasses, offal, or rendering smells.
2. **Dog Food & Animal Feed** – Several people compared the smell to dog food, particularly "Pal dog food" or a "burning dog food" odour.
3. **Sewage & Waste** – Some described it as resembling sewage, urine, or faeces.
4. **Strong, Unpleasant & Pungent** – Words like "putrid," "disgusting," "vile," and "awful" were frequently used.
5. **Blood & Bone** – A few respondents noted a "blood and bone" or "rotting tallow pollutants" type of smell.
6. **Cooking or Burning Odours** – Some mentioned a "cooked meat but sickening smell" or a "burning" odour.
7. **Weather & Environmental Impact** – A few noted the smell is stronger on hot or still days and can spread across the town.
8. **Indescribable But Overpowering** – Some found it difficult to describe but noted its intensity and lingering presence.

3.1.3. ODOUR INTENSITY RATINGS

Analysis of individual responses indicates a moderately strong **positive correlation (r = 0.676)** between odour frequency and intensity, suggesting that those who report odours more frequently also tend to rate them as stronger.

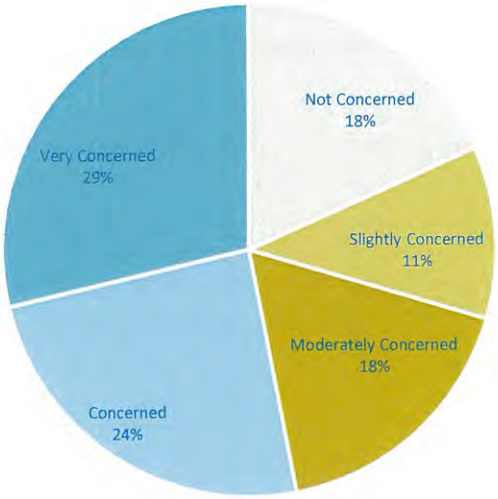
If you have noticed odours emitted from the Lagoon Road facility, how would you rate their intensity? (n=115)



3.1.4. CONCERN LEVEL

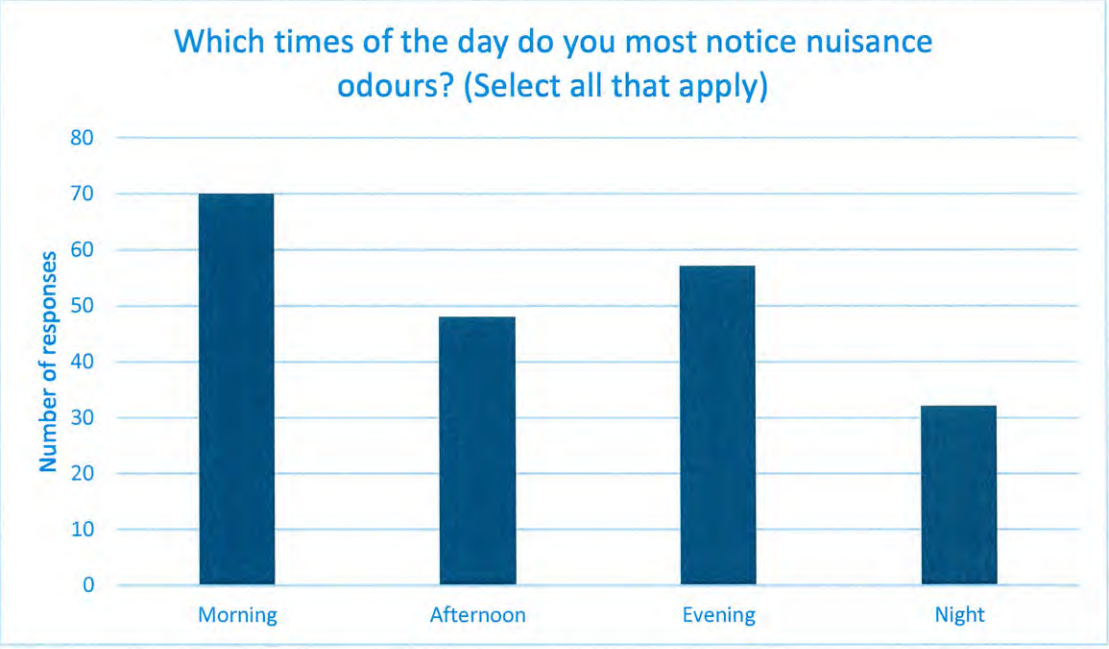
Concern levels were divided, with **53.05% expressing concern** or **strong concern** about odours, while **47.95% were moderately concerned or not concerned at all**.

If you have noticed odours emitted from the Lagoon Road facility, how concerned are you about them? (n=115)



3.1.5. TIME OF DAY WHEN ODOURS ARE MOST NOTICED

Odour perception varied throughout the day, with **morning being the most common time of detection**:



This data suggests that **odour conditions may be influenced by external environmental factors** such as weather conditions, wind direction, and facility operations at specific times.

4. RESPONSE AND ACTION PLAN

4.1. IMMEDIATE ACTIONS

Following the community consultation process, TFI has identified several **immediate actions** to address key concerns:

- **Strengthened Odour Monitoring:** TFI has committed to enhancing its odour monitoring efforts by introducing additional sensors to track foul air quality parameters that are directed for treatment via the onsite biofiltration unit.
- **Process Optimisation:** Adjustments to by-product processing schedules to improve process control onsite.

Infrastructure Upgrades: Consideration of community feedback into the site investigation and proposed upgrades to key processing equipment onsite

4.2. LONG-TERM COMMITMENTS

In addition to immediate actions, TFI is implementing a **long-term odour management and environmental improvement strategy**, which includes:

- **Comprehensive Odour Management Plan:** TFI will develop and implement a formal **Odour Management Plan** to ensure continued improvement in odour management and control.
- **Online Community Updates:** In addition to immediate actions, TFI is implementing a long-term odour management and environmental improvement strategy, which includes:
    - Website Updates: TFI will ensure that relevant information regarding odour management efforts, monitoring data, and improvement initiatives is regularly updated on the company website, providing the community with easy access to the latest developments.
    - Targeted Email Communication: TFI will explore sending periodic updates to survey respondents and other interested community members to keep them informed about odour management initiatives. These updates will be carefully managed to ensure they remain meaningful and informative. Additionally, all communications will adhere to privacy regulations.
- **Investment in Infrastructure Improvements:** Commitment to infrastructure enhancements and process modifications to further reduce potential odour emissions.
- **Ongoing Collaboration with Regulatory Bodies:** TFI will maintain and strengthen collaboration with the **Environmental Protection Authority (EPA)** and other relevant stakeholders to ensure compliance with all regulatory requirements and industry best practices.

4.3. ALIGNMENT WITH LICENCE REQUIREMENTS

This consultation process and subsequent action plan **directly align with the requirements** outlined in **Licence No. 11649**. By undertaking a **transparent and structured approach** to community engagement, TFI has ensured that:

- **Public consultation has been fully considered and integrated** where possible into the Environmental Improvement Programme (EIP).
- **Community feedback has been documented, analyzed, and considered** in the development of odour mitigation strategies.

- **Ongoing efforts are being made to communicate with residents** and provide visibility into TFI's environmental management practices.

4.4. COMMUNITY PERCEPTIONS AND OPEN-ENDED FEEDBACK

In addition to structured survey responses, the consultation also gathered **open-ended feedback**, providing valuable qualitative insights into how residents perceive TFI's role in the community and its impact on daily life. These responses offer a **more nuanced perspective beyond statistical data**, highlighting both concerns and positive sentiments toward the facility.

4.4.1. POSITIVE COMMUNITY SENTIMENTS

Several respondents **acknowledged TFI's contribution** to the local economy and employment, recognizing the company's role as a **major employer** in the region. While some community members expressed concerns about odour, they also noted that **TFI's operations provide significant economic benefits**, helping sustain jobs and local businesses.

Some respondents expressed appreciation for **TFI's efforts to engage with the community**, stating that the consultation process was **a step in the right direction** toward greater transparency and proactive problem-solving. A few residents also commented that they had noticed **recent improvements in odour management compared to past years**, reinforcing that TFI's ongoing investments in environmental controls were yielding positive results.

4.4.2. AREAS OF CONCERN RAISED BY RESIDENTS

While some residents supported TFI's role in the community, others raised concerns regarding **odour emissions**, with a portion of respondents describing the smell as **disruptive to their quality of life**, particularly at certain times of the day. **Common themes** in these concerns included:

- The perception that **odours were more noticeable on specific days**, suggesting a potential link to facility processes or environmental factors.
- **Disruptions to outdoor activities**, such as entertaining guests, exercising, or spending time outside during periods when odours were present.
- Concerns about the **potential long-term impact of odour on property values** and the **reputation of the town**.

4.4.3. BALANCING PERSPECTIVES

The **diversity of responses** indicates that while odour remains a concern for a subset of the community, it is **not a universal issue** across the broader population. Many respondents **do not experience odour regularly** or consider it a major problem, while others believe that TFI has been making **progress in reducing environmental impacts**.

This feedback reinforces the importance of **continued dialogue with the community**, ensuring that both concerns and positive developments are acknowledged. TFI remains committed to:

- **Listening to residents** and understanding their concerns.
- **Implementing further improvements** to mitigate odour emissions.
- **Maintaining transparency** regarding environmental initiatives.

By integrating both **qualitative and quantitative feedback**, this report provides a **balanced view of community perceptions**, ensuring that all voices are considered in the ongoing development of the Environmental Improvement Programme.

5. CONCLUSION

The **community consultation process** has provided valuable insights into local perceptions of **odour emissions** from the **Lagoon Road Facility**. While a subset of the community **expressed concerns** regarding odour frequency and intensity, the data suggests that **overall community concern remains limited**.

TFI remains **committed to addressing any legitimate concerns** through:

- **Enhanced odour monitoring and management strategies** to better diagnose and reduce air quality issues.
- **Improved engagement with the local community** to foster transparency and trust.
- **Investment in environmental infrastructure** to improve air quality and operational sustainability.

Through **ongoing investment in environmental sustainability** and **continuous dialogue with the local community**, TFI aims to ensure that its operations continue to align with:

- **Regulatory requirements**
- **Community expectations**
- **Best industry practices**

By taking **proactive measures** to address environmental concerns, **TFI seeks to maintain a positive relationship** with the Murray Bridge community while ensuring that its facility **operates responsibly and sustainably**.