



## Queensland Treasury

Our reference: 2010-19418 SPL  
Your reference: MOSSL27RP804231

10 November 2020

CocoNutZ Australia Pty Ltd  
C/- Canberra Town Planning  
5/32 Lonsdale Street  
BRADDON ACT 2612  
hannah@canberratownplanning.com.au

Attention: Hannah Neville

Dear Sir/Madam

### Pre-lodgement meeting record

This pre-lodgement record provides a summary of the matters discussed at the pre-lodgement meeting in addition to providing further advice prepared subsequent to the meeting.

This record provides advice to assist in the timely processing of a development application. While this advice is provided in good faith, if the proposal is changed from that which was discussed with the department during the pre-application meeting, this advice is not binding.

### Reference information

Departmental role: Assessment manager or referral agency  
Departmental jurisdiction: **Schedule 10, Part 5, Division 4, Table 2** – Material change of use for non-devolved environmentally relevant activities  
Pre-lodgement meeting date: 30 October 2020  
Meeting attendees:

Name	Position	Organisation
Belinda Jones	A/Principal Planner	State Assessment and Referral Agency (SARA)
Anthony Westbury	Planning Officer	SARA
Denise Leon	Principal Environmental Officer	Department of Environment and Science (DES)
Hannah Neville	Senior Town Planner	Canberra Town Planning
Lucas van der Walt	Managing Director	CocoNutZ Australia Pty Ltd
Peter Mollee	R & D Manager	CocoNutZ Australia Pty Ltd
Shaun	Plant Manager	CocoNutZ Australia Pty Ltd

**Location details**

Street address:	34 Mill Street, Mossman
Real property description:	Lot 27 on RP804231
Local government area:	Douglas Shire Council
Existing use:	Mossman Sugar Mill

**Details of proposal**

Development type:	Material change of use
Development description:	Environmentally relevant activity (ERA) for the establishment of a kecap manis production plant (ERA 15 fuel burning and ERA 28 Sugar milling and refining)

**Supporting information**

Drawing/report title	Prepared by	Date	Reference no.
State Assessment and Referral agency (SARA) Lot plan report	SARA	23 Oct 2020	27RP804231
Pre-lodgement request form	Canberra Town Planning	23 Oct 2020	-
Demonstration Facility – Mossman Lease – Layout Plan	EDMS Australia	11 Feb 2020	1297-4271-D-27169 Rev P2
Mossman Kecap Manis Project Overview	CocoNutZ Australia Pty Ltd	7 Oct 2020	Rev C

**Key discussion points:**

- The project team described the development as a research and development facility that if successful may lead to full commercial production of kecap manis.
- The proposed development will be undertaken as a separate business interest to the operation of the sugar mill.
- An area for the site is proposed to be leased from Mossman Mill on a five year (plus five year) term. SARA advised that a lease exceeding 10 years would constitute a reconfiguration of a lot under the *Planning Act 2016*.
- The project team gave a detailed explanation of the process (as per the project overview document) of how sugarcane juice would be fermented with additives to produce an alternative to coconut sugar. Coconut sugar is a key ingredient of the manufacturing of kecap manis. The product would then be shipped in 200 litre containers to be bottled and packaged overseas. Key elements of the process includes:
  - o Milling up to 10,000 tonnes of sugar cane per year, expanding to 100,00 tonnes per year and then full commercial development (it should be noted that pre-lodgement material identifies the development involving 20,000 tonnes per year)
  - o Fuel burning to generate steam
  - o Pasteurisation, fermentation and then evaporation of sugar can juice
  - o Addition of dry ingredients for flavour
  - o Final boiling, cooling and packaging of product

- The cane will go through two cleaning processes. The dirt and material removed from the cleaning process will be returned to the Mossman Mill who supply back to the farmers for reuse.
- The exhausted cane fibre (bagasse) will be returned to the Mossman Mill bagasse waste stockpile.
- The cane juice will be filtered, decanted and centrifuged to remove suspended solids. The solids will be returned to the mill mud stockpile associated with the Mossman Mill.
- The cooling water will also be supplied by the Mossman Mill, utilised and returned to Mossman Mill for discharge to surface waters in line with their EA release conditions.
- Based on the information provided, the proposed activity:
  - o Triggers ERA 28 Sugar milling or refining.
  - o May trigger ERA 15 Fuel burning depending on the maximum capacity of the fuel burning equipment (kg/hr). The threshold for ERA 15 is at least 500kg/hour.
- The project team indicated that due to contractual and business needs, a separate environmental authority (EA) would be desirable rather than operating under an amended EA held by the Mossman Mill.
- Any future application should be accompanied by an environmental impact assessment including modelling for noise, odour, and air quality. The application would also require an environmental management plan.
- SARA to provide written further pre-lodgement advice to applicant, giving further detail on DES requirements and application processes.

It is considered that the above summary is an accurate record of the matters discussed at the pre-lodgement meeting.

The following information is provided as further advice prepared subsequent to the meeting. Please note the pre-lodgement advice is valid for a period of nine months from the date of issue, unless a change in legislation or policy occurs that would affect the pre-lodgement advice.

Item	Advice
<b>Proposal</b>	
1.	<p>The development is for construction and operation of a research and development facility (pilot plant) for kecap manis, which is an Asian condiment traditionally produced using coconut sugar.</p> <p>CocoNutZ Australia are seeking to test whether successful laboratory results producing kecap manis from sugarcane juice using fermentation biotechnology and additives (replacing coconut sugar), can be replicated at a commercial scale.</p> <p>It is proposed to lease an area within the Mossman Mill site, which includes an existing administration building and three sheds, two of which are existing storage/packing sheds and one of which will be constructed as part of the project.</p> <p>The operation will use its own mill to ensure sugarcane juice quality, and the pilot plant's maximum annual output of finished product will be limited to 3,000 tonnes (from 10,700 tonnes of sugarcane).</p> <p>The proponent has advised that Douglas Shire Council has determined that the use may be defined as a Research and technology industry in the planning scheme. If an application is required for the proposed development under the Douglas Shire Planning Scheme, council will</p>

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	<p>be the assessment management for the development application and referral of the application to the State Assessment and Referral Agency (SARA) will be required. If there are no approvals required under the planning scheme, SARA will be the assessment manager for a material change of use for an ERA.</p> <p>Based on the information provided, the activity will include:</p> <ul style="list-style-type: none"> <li>• ERA 28 Sugar milling or refining: <ul style="list-style-type: none"> <li>o Crushing or grinding 200t or more of sugar cane in a year or manufacturing 200t or more of sugar or other sugarcane products in a year (aggregate environmental score 48).</li> </ul> </li> </ul> <p>The proposed development may also include:</p> <ul style="list-style-type: none"> <li>• ERA 15 – Fuel burning: <ul style="list-style-type: none"> <li>o Using fuel burning equipment that is capable of burning at least 500kg of fuel in an hour (aggregate environmental score 35). This will be dependent on the maximum capacity of the fuel burning equipment (kg/hr).</li> </ul> </li> </ul>
<b>Existing environmental authority (EA)</b>	
2.	<p>Lot 27 RP804231 contains the Mossman Mill which is authorised under environmental authority EPPR00920713 to undertake ERA 15 (fuel burning) and ERA 28 (sugar milling or refining). It may be possible to amend EPPR00920713 to include the proposed activity provided that it can be demonstrated that the following requirements 'single integrated operation' in section 113 of the <i>Environmental Protection Act 1994</i> are met:</p> <ul style="list-style-type: none"> <li>(a) the activities are carried out under the day-to-day management of a single responsible individual, for example, a site or operations manager; and</li> <li>(b) the activities are operationally interrelated; and</li> <li>(c) the activities are, or will be, carried out at 1 or more places; and</li> <li>(d) the places where the activities are carried out are separated by distances short enough to make feasible the integrated day-to-day management of the activities.</li> </ul> <p>If it is understood that an amendment to the existing EA may not meet the operational needs of the proposed development as it is not intended for the kecap manis project and the Mossman Mill to be managed by a single responsible individual. A separate lease is proposed for the kecap manis project to enable separate operation of the development on the same site as the Mossman Mill.</p>
<b>New environmental authority</b>	
3.	<p>If an amendment is not proposed to the existing EA that applies to the site, a material change of use for an environmentally relevant activity will be required. ERAs 15 and 28 are concurrence ERA's under the <a href="#">Environmental Protection Regulation 2019</a>. A material change of use of premises for an environmentally relevant activity is assessable development under the <i>Planning Act 2016</i> if the activity is a concurrence ERA.</p> <p>Under section 115 of the Environmental Protection Act 1994 an application for a material change of use for an ERA will also be an application of an EA. The application for a material change of use and EA will be considered concurrently.</p>

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<b>State Development Assessment Provisions (SDAP)</b>	
4.	<p>The current <a href="#">State Development Assessment Provisions</a> (SDAP) will be used in assessing the application. Based on the location and scale of the proposed development State code 22: Environmentally relevant activities is applicable to the proposed development.</p> <p>To address the SDAP the applicant must demonstrate how the acceptable outcomes of the state code will be achieved. An application that complies with all applicable acceptable outcomes is considered to satisfy the corresponding performance outcome. If the development cannot meet an acceptable outcome, the applicant must provide evidence on how the proposal meets the performance outcome.</p> <p>To assist applicants in addressing the SDAP criteria the department has prepared <a href="#">SDAP version 2.6 response templates</a>.</p> <p>Please note, the SDAP is continually amended to reflect updates to legislation and policies, and the version current at the time of application lodgement will be used for assessment.</p>
<b>Environmental Protection Act 1994</b>	
5.	<p>As outlined in section 125 (or for amendments section 226) of the <i>Environmental Protection Act 1994</i>, an application will need to include:</p> <ul style="list-style-type: none"> <li>• a description of the environmental values (both onsite and offsite) likely to be affected by the proposed activity</li> <li>• details of any emissions or releases likely to be generated by the proposed activity</li> <li>• a description of the risk and likely magnitude of impacts on the environmental values</li> <li>• details of the management practices proposed to be implemented to prevent or minimise adverse impacts</li> <li>• details of how the land the subject of the application will be rehabilitated after the relevant activity</li> <li>• a description of the proposed measures for minimising and managing waste generated by the relevant activity</li> <li>• details of any site management plan (i.e. associated with contaminated land) that relates to the land that is the subject of the application.</li> </ul> <p>Technical guidelines have been developed to outline what information to include in an application where impacts related to air, land, noise, water or waste have been identified. These are available at: <a href="https://www.business.qld.gov.au/business/running/environment/licences-permits/applying-environmental-authority/technical-information-requirements">https://www.business.qld.gov.au/business/running/environment/licences-permits/applying-environmental-authority/technical-information-requirements</a>.</p>
<b>Environmental values</b>	
6.	<p>Environmental values that will need to be considered in your application including:</p> <ol style="list-style-type: none"> <li>1. <b>Water</b> – a waterway is located to the east of the proposed site. Impacts to environmental values of releases from the site will need to be assessed, including impacts associated with adding a wastewater stream to be discharge via the authorised discharge point for EPPR00920713.</li> <li>2. <b>Noise</b> – sensitive receptors are located within 160m of the proposed site. The application will need to demonstrate the noise will not impact the environmental values of the sensitive receptors.</li> <li>3. <b>Air</b> – the application will need to be demonstrate through air dispersion modelling that any</li> </ol>

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	<p>release of point source air emissions will not result in exceedances of the air quality objectives in the Environmental Protection (Air) Policy. Emissions from the Mossman Mill will also need to be included into the modelling.</p> <p>4. <b>Odour</b> – The application will need to demonstrate how any potential odours from the proposed activity (such as through fermentation) will be managed to ensure there is no impact on the environmental values of sensitive receptors.</p> <p>A site layout plan identifying all release and monitoring points (with associated GPS Co-ordinates, Latitude and Longitude) to the environment including stacks, vents, water discharge points; and sensitive receptors including waterways and closest residents and recreational areas should be included with any development application.</p> <p>Consideration of if bagasse, the waste generated from the processing plant is considered a regulated waste as outlined under section 42 of the Environmental Protection Regulation 2019 will require further consideration in any future development application. This will determine whether waste tracking requirements will apply. On the information provided it is difficult to determine if the bagasse is a regulated waste as further details regarding the quality of the bagasse is required.</p>
<b>Common conditions</b>	
7.	The department has developed ' <a href="#">Common conditions</a> ' to enable you to gauge what conditions will likely be included in your environmental authority (or amended environmental authority).
<b>Registered suitable operator</b>	
8.	To undertake an ERA in Queensland you must be a Registered Suitable Operator (RSO). You can apply to be a registered suitable operator at the same time you apply for your environmental authority. The following website explains how to apply to be a registered suitable operator and how to apply for an environmental authority: <a href="https://www.business.qld.gov.au/running-business/environment/licences-permits/applying/lodging">https://www.business.qld.gov.au/running-business/environment/licences-permits/applying/lodging</a> .
<b>Development assessment fees and forms</b>	
9.	<p>Based on the information provided, the applicable fees under the <a href="#">Planning Regulation 2017</a> for the proposed development are:</p> <ul style="list-style-type: none"> <li>Schedule 10, Part 5, Division 4, Table 2, Item 8 - Non-devolved environmentally relevant activities: \$3,373.00 for an relevant activity stated in the EP Regulation with an aggregate environmental score of more than 25 but no more than 74. If the proposed development involves both ERA 15 and ERA 28 the total fee will be \$6,746 (\$3,373 x 2).</li> </ul> <p>Please note that the assessment fees are subject to change. It is recommended you check Schedule 10 of the <a href="#">Planning Regulation 2017</a> or contact the department prior to the lodgment of your application, to confirm the assessment fees applicable at the time.</p> <p>The development application will need to include <a href="#">DA Form 1</a>. To assist in completing DA Form 1, the department has prepared the <a href="#">DA forms guide: Forms 1 and 2</a>.</p>
<b>Annual fee</b>	
10.	An EA requires the payment of an annual fee. This is administered by the Department of Environment and Science (DES).

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	<p>The first annual fee is payable within 20 business days of the effective date of an environmental authority.</p> <p>If multiple ERAs are undertaken as part of a project, the annual fees will be based on the ERA with the highest Aggregate Environmental Score (AES). Current annual fees for ERAs can be found at the following link:  <a href="https://environment.des.qld.gov.au/_data/assets/pdf_file/0025/88702/era-is-summary-annual-fees.pdf">https://environment.des.qld.gov.au/_data/assets/pdf_file/0025/88702/era-is-summary-annual-fees.pdf</a></p>
<b>Further pre-lodgement advice</b>	
11.	<p>For further pre-lodgement advice please use the 'related actions' tab in the 2010-19418 SPL MyDAS2 record and select 'Request more pre-lodgement advice from SARA'. You will be given an option to select either a meeting or written advice.</p>

This pre-lodgement advice does not constitute an approval or an endorsement that SARA supports the development proposal. Additional information may be required to allow SARA to properly assess the development proposal when a formal application has been lodged.

For further information please contact Anthony Westbury, Planning Officer, on 40373215 or via email CairnsSARA@dsgmp.qld.gov.au who will be pleased to assist.

Yours sincerely



Brett Nancarrow  
 Manager (Planning)