

IAQM consultation comments and responses

The IAQM *Guidance on the assessment of odour for planning* had a member consultation run from the 4th March – 24th April 2026. The table below provides details of the comments received and responses from the working group on these comments.

Text reference	Comment	Working group comment
General comment	I previously reviewed a version of this guidance almost word for word and made many comments. Being listed as a reviewer should not be understood as endorsement of the final product.	This is addressed by the disclaimer. The commenter may have their name removed if requested.
General comment	Overall, if I were a member of the public I would feel unhappy with the (government's) withdrawal of numerical thresholds and consequent emphasis given to subjective methods – this guidance feeds into With the removal of numerical thresholds and it is likely to be the best informed, most articulate and best funded who will get protection by the system. There's discussion as usual of where annoyance starts, at which ouE/m3, but there is never any discussion of the fact that hourly averages are not necessarily the best measure of odour. The nose is sensitive to changes in odour so shorter time scale peaks in odour due to changes in emissions, or, changes in meteorological conditions on a timescale less than 1 hour are important.	
Table 2.1	“High sensitivity receptor,” should include food preparation facilities and food retail outlets. Possibly also things such as textile production/storage facilities. i.e not all industrial/commercial receptors can be assumed to be Medium/Low Sensitivity.	This is covered by the header of Table 2-1.

Section 3.1	As usual, with IAQM guidance, the section is silent on the uncertainty associated with anything other than dispersion modelling. Dispersion models are treated with much greater suspicion than any other tool, what about AI?	The guidance covers all methods and acknowledges each has a degree of uncertainty associated with their estimates of impact. AI is not covered in the guidance and is an evolving topic that the IAQM is separately reviewing and considering a future position statement on.
Section 3.2	Monitoring (e.g. sniff tests) can give a measure of odour at specific locations under the conditions prevailing at the times and days of the sampling (see Appendix 2); yes, just a snapshot, see later comments.	This is covered in the guidance.
Section A1.1	Are you serious????????????? This is the 21st century. Suggest you delete “Simplified modelling, such as screening models, look-up tables and nomographs.” Why would you do that when almost every IAQM member can more easily run “Fully quantitative atmospheric dispersion modelling.”	While dispersion modelling is often used, it does not detract from simplified alternatives being used where appropriate.
Table A1.1	“Direction to source, Prevailing weather conditions.” I commented previously that IAQM guidance has a tendency to say things as if they are true in all cases which leads to longstanding wrongful assumptions. The conditions under which maximum impacts occur at a single receptor depends on the source location, efflux parameters, receptor location including height, all the complexity around (building, terrain, roughness) and meteorological data and probably more. That’s for one receptor. At other receptors, all other factors being equal, different meteorological conditions may give the worst case for that receptor.	This is covered in Table A1.1, which relates to each receptor individually.
Section A2.1	“Sniff testing needs to be carried out on sufficient occasions to represent the full range of likely odour emissions and in meteorological conditions favourable to odour detection for a particular site (e.g. light wind and stable conditions). The number and frequency of tests will therefore be project specific and must be justified by the assessor in each case.” Is this (sufficient occasions) every achieved in the UK???	The sentence has been altered.

Section A2.1.1	“The VDI 3940 method ²⁷ is very comprehensive but requires a full year’s worth of measurements (unlikely to be compatible with a planning application timetable) and can require multi- person “sniffing squads”. Precisely!!	This is covered in the guidance.
General comment	Re. long term sniff testing. Even a year of continuous monitoring probably does not have a high probability of capturing the worst episodes, where we have cyclic, relatively short peak emissions. The chances of worst emissions coinciding with worst dispersion conditions at a particular receptor are often low. We can of course cover this better with modelling! Eg effectively covering many more scenarios, by running offset cycles over multiple years of met data, as we do with poultry . I should also have said that conversely if one performs a test and just happen to experience high levels then that might lead to a somewhat biased view. This can also occur if high emissions poor dispersion conditions are targeted	The guidance is clear on the need to combine assessment tools and best practice is to use a multi-tool approach. This may include sniff-testing where appropriate, the survey strategy for which should be stated and justification given for how it is appropriate.

General comment	Qualitative assessment I'd urge some caution, possibly restraint, in providing set numbers within the qualitative guidance and linkages to classifications (distances, emission rates etc,) I fully understand the intent, and although useful as examples, these will not apply universally to small, medium, large-scale sites. Professional judgement is of course applicable, however once a number, distance or fact is placed in non-stat guidance it does become set in stone. I saw the old qualitative assessment version as being rather useful – A short quick screening check based on simple principles. It could be used by anybody with some confidence on general common-sense principles. It served a single useful purpose - i.e. a quick reference of if there is clearly a problem or not. Odour is a simple subject and often common sense is lost over trying to over analyse. With more complexity, more assessments will come out in the 'middle' outcomes of such an assessment. It will start to defeat the purpose of having a simple qualitative method giving a simple Red, Amber, Green quick reference decision to understand if full assessment is needed or not. Personally, I think the changes might detract from having a simple common-sense lay-person approach which gave a simple answer. Keep it simple on a first pass and elaborate if needed rather than as part of the initial consideration. No problem in some prose that identifies things to consider but would prefer it not to be quantified (which brings the question of what the basis of these distances, values etc.). I do think that Table A1.1. may be more confusing and will stifle application of professional judgement by telling people what is close, what is distant, what is small-large etc.. This my own opinion, i.e. a preference to keep things simple and non-quantified.	This is a very comprehensive and thought out comment, however one of the main drivers for updating the guidance around the SPR approach was that far from application as a simple screening stage assessment or supplementary assessment tool, members of the working group observed it being used as a primary assessment tool with very rigid application of the relatively limited quantitative thresholds given as examples in the 2014/2018 guidance. The intention with the update is not to make the process more complicated, but ensure the guidance is sufficient to allow practitioners to use the SPR approach for the range of applications suggested in the bullets a) - e) at the start of section A1.1.2. Where indicative quantitative criteria have been provided, they have been designed and agreed in discussion with the working group members from collective experience of application of the old guidance. The working group believe many of these to be helpful in applying the guidance, whilst recognising that it will never be possible to reach a unanimous consensus on such issues.
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Enhancement and quantification is for latter stages of assessment, not the first qualitative step. I just think it will stifle the ability to apply professional judgement especially under challenge in planning cases. I would recommend removing the specified values stated in Table A1.1 so that professionals can use their own judgement. The intent is fine, explain what aspects matter in consideration but would suggest it is overstepping to define what is small, large etc.

General comment	Withdrawn Guidance – Promotion of modelling The guidance seems to be referencing and relying on a lot of withdrawn guidance notes. This makes me anxious that the general direction of travel from regulators is not the same as we are promoting in this guidance. Some are out of date, but odour effect assessment of all kinds (incl. modelling) has been deliberately removed from UK statutory guidance for permitting. I have it on record that the EA now don't accept modelling as evidence whatsoever. Note: I do not personally agree with the EA's position - however this revised guidance does gloss over the general direction of travel. As written, we are also effectively promoting a situation where: Small scale developers are recommended to apply provide complicated effect prediction assessments (semi-qualitative, detailed monitoring, sniff surveys, modelling assessments). however much larger processes and emitters only do very basic simple risk assessments and appropriate measures assessments (if anything at all). Again, I do not agree with the EA's position, but is it a justifiable position for the IAQM to take? I have spoken to a number of people about the guidance within the water sector and this item has popped up a number of times. One quote was below. “I personally think it's interesting in the fact that the guidance is very reliant for odour dispersion modelling assessments on guidance that has been withdrawn by the particular regulatory body and has been removed from their webpage. I would presume this is very unusual that a guidance document points so strongly to use withdrawn guidance as best practice? Granted there is nothing else but in the future I can see this being challenged as how relevant is a withdrawn document to actually specifically point too”	The guidance is for planning, not permitting.
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Really difficult one for me. Odour is in a tricky place at the moment especially with methods promoted by the IAQM being clearly rejected by national regulators. A gut feeling is that the guidance needed a light touch refresh on how relevant it is today (the current position, any changes, updating case law), maybe pointed to emphasise the importance of effect-based assessments. I'm unsure if the qualitative guidance needed revisiting and can see the revised Table A1.1 causing some future issues by out of context misquoting. I would have liked to have seen some clarification on interaction of planning and permitting in light of these changes. As an example, recommending assessment of odour at planning stage for permitted facilities - now essential as the EA do not assess odour effects in granting permits (they just check for application of appropriate measures irrespective of effects). This would allow decision makers to have all the information on odour effects, rather than to pass over this crucial step - i.e. to say "everything will be fine, it will be permitted". Notably this is promoted within SEPA odour guidance, and possibly worth promoting as best practice UK wide, in light of EA's absence of assessment.

Some specific help on residential encroachment would be appreciated. There remains an assumption that locations outside of a licensed or permitted facility will be odour free by virtue of it being permitted – this is clearly not the case nor an expectation of permitted facilities. It would be appreciated to set out an accurate position on receptor encroachment in IAQM guidance.

Some work to lobby the EA on changing their opinion on odour effect assessment might also be very useful!

General comment	Having used the odour guidance in my former roles working in consultancy, I have generally found it to be a very useful start point, and the new guidance appears not to substantively change the advice it provides (which is good). However, I have a few fairly general comments: The odour guidance is great in providing a general approach and I appreciate you have not sought to duplicate documents published by SEPA and others on how odour is assessed and regulated. However, there is a wide range of quality in the odour reports available and I wonder whether some of the sectors where guidance is less available on a description of how an assessment should be undertaken would be helpful. Some examples of issues I have encountered which could be considered: In previous roles I have been involved in assessments which screened the impacts of poultry farms where homes were being built in relatively close proximity. The rural population may have been at least somewhat desensitised although dispersion modelling is likely to be more appropriate as this is not guaranteed and its intensity may have still been too high, in hindsight. Some consultancies may have refined a method for accounting for variation in poultry and pig farm odour at the point in life cycles within a dispersion model, although not all would. I have recently reviewed reports for a Waste Transfer Station where the Applicant modelled two scenarios – one outside of working hours and one in working hours, which unfortunately under-estimated additive odour. This only was apparent in further modelling. A description of the extent to which odour has genuinely cumulative impact would be useful. For example, I have been involved in undertaking an odour assessment for an anaerobic digester in Norfolk for a planning application, which may not have had a substantial impact in its own right, but was surrounded by poultry farms. The Beddington Lane area in Sutton Council's jurisdiction has an anaerobic digester next to sewage treatment works and I	These points are covered in the guidance. The guidance makes clear that assessments should be completed by qualified practitioners and that assessments should be tailored for the actual source, pathway and receptor. Consideration should be given a wide variety of baseline factors, including cumulative odours.
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believe a former landfill. These are very hard to explain in combination. I don't know how guidance can cover this effectively but thought I would raise.

The greater clarity in the odour sniff test impact magnitude criteria is significantly appreciated. Aligning 'distinct' with 'barely recognisable' caused me significant confusion in the past.

Could the mitigation section be expanded to encourage "hard" mitigation measures at source to be considered alongside softer measures for an OMP? In Barnet, we often advise developers for major mixed-use schemes of the need to make space available in risers if flexible commercial use at ground floor level of blocks of flats, so that premises selling hot food can retrospectively install a flue discharging at roof level. It might also be worth describing new advances in odour mitigation technologies for restaurants, including systems which recirculate air within the kitchen. Westminster City Council have published guidance on such systems here, which may be worth citing.



Section 1	Odour exposure In this section, the term source-pathway-receptor is first mentioned but it is not until Section 3: Using Odour Assessment tools that the S-P-R acronym is used. It may be helpful for the reader, particularly those who are new to odour assessment to define or provide examples of a source, pathway, and receptor. The use of a diagram in this instance could be particularly beneficial.	The guidance is intended for practitioners and SPR is commonly understood in the industry. SPR is also explained in bullets in Section 1.
Section 2	General approach to assessing odour effects for planning It is welcomed that this section highlights that some odours can be considered 'pleasant' by certain individuals and should not be classified as beneficial as the perception of an odour can be personal. The guidance could benefit from spotlighting this to highlight its importance in the assessment and not just focus on odours that are traditionally regarded as adverse e.g. sewage treatment works.	This is covered in Section 2.2 of the guidance.
Section 3	This section we feel rightly highlights the need for combining various approaches to assessing odour as it can be subjective. When selecting an assessment tool, the season or time or year should also be highlighted as a factor in tool selection. If selecting sniff testing for example, it would likely be less beneficial to undertake an assessment in the middle of winter compared to summer when odorous emissions may be higher.	The guidance is clear that the choice of assessment tools should be justified.

Table A1.1	Table A.1.1 deals with odour containment in relation to source odour potential. The examples given are well-sealed buildings or structures, open / slatted sided structure, or no source containment. We feel it would be interesting to see for example, how would buildings with ventilation systems or exhaust points be treated in relation to source odour potential? The building could be well sealed but if there are exhaust points pointed towards sensitive receptors there could be a higher source odour potential. Equally, a number of facilities that handle odorous substances have roller shutter doors or similar to allow for tipping or deliveries. The opening of access points should also be accounted for as these can often be left open for ease of use by the operators, reducing the effect of containment. The recommendation of indicative dispersion modelling seems like a good recommendation and should be utilised by assessors in determining the potential impacts from odorous sources. However, because it is included at the bottom of the table in the appendix, it feels like this may be missed by a reader and not considered fully during their assessment. We feel this should be given more prominence, as it will help to make some of the qualitative assessments more robust and help with any targeted mitigation measures.	Minor edits to the guidance have been made.
Section A1	The International Handbook on the Assessment of Odour Exposure using Dispersion Modelling notes that in some situations, gridded three-dimensional numerical meteorological model data may be more appropriate than reliance on a single surface meteorological station, particularly where spatial variability in wind fields, terrain effects, or coastal influences are important. Has the IAQM considered including guidance on meteorological data selection for odour modelling in the Guidance on the Assessment of Odour for Planning?	This has been considered too specific for this guidance.



Table A2.1	The update to the intensity level in Table A.2.1 is a welcome update and provides greater clarity in comparison to the previous guidance. The update from ‘3 – Distinct’ to ‘3 – Identifiable’ is an improvement as previously it described Distinct as being barely recognisable which contradicts what you would normally consider to be ‘Distinct’, whereas the term ‘Identifiable’ fits this category better. The change from ‘Strong’, ‘Very Strong’ and ‘Extremely Strong’ to ‘Distinct’, ‘Very Strong’ and ‘Extreme’ also seems like an improvement as they are more clearly defined and remove some subconscious bias.	No change needed.
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Box A2.1	Sniff test duration Box A2.1 states that “The sensory test is carried out at each test location over a standard observation time, typically 3–5 minutes. Test durations shorter or longer than this would likely not be appropriate and should be justified”. 10-minute observation periods are widely used internationally and can better capture short-term fluctuations in odour intensity than shorter observation periods. Could the wording in Box A2.1 be adjusted to take into account longer observation periods (e.g. 10 minutes) where this is justified by the assessment context? Additionally, could the IAQM consider whether specifying a standard sampling duration and frequency (e.g. every 10 seconds for 10 minutes) would help ensure a consistent sample size when using the matrix in Table A2.2 to assess odour exposure? A consistent sample size and duration would help with consistency between different projects and would reduce individual assessor bias. For example, if they perceive there to be little or no odour at the start, they may be more inclined to reduce the sample period. Having an inconsistent sample period would also have implications for the determination of odour exposure as defined in Table A.2.2 and could allow for the assessor to indirectly or directly influence the outcome of an assessment, by reducing a sample time to increase odour exposure or extending it in the hope that is reduced. Number of tests Along with the duration of tests, the number of tests is left somewhat ambiguous. This will obviously vary depending on a project, but we feel the guidance could benefit from the IAQM being more specific in how the number of	The text has been altered.
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tests should be determined.

Number of odour assessors

The guidance provides helpful advice on the design and interpretation of sniff testing surveys; however, it would be useful to include some additional commentary on the potential role of multiple assessors conducting sniff testing simultaneously. In particular, the guidance could note that, in certain circumstances, undertaking sniff testing with more than one assessor at the same time and location may help to account for inter-individual variability in odour sensitivity, thereby increasing confidence in the observations and reducing reliance on a single individual's sensory response. This may be especially relevant for higher-risk sites.

Table A2.2	Table A2.2 includes the following statement in the notes: “Consideration when assigning intensity should be given to the ability of the local community becoming hypersensitive to nuisance odours in comparison to a practitioner undertaking a sniff test. For example, an lmean of 2 for a practitioner could be considered a 3 for a hypersensitive local community member.” Whilst I agree that it is entirely possible for members of the local community to become more sensitive to a particular odour than an odour practitioner undertaking a structured assessment, I think it is also important to recognise that the opposite can occur. In some circumstances, community members who are chronically exposed to an odour source may become partially desensitised over time, particularly where exposure is frequent or long-term. This could result in lower perceived intensity or nuisance compared with a practitioner undertaking a short-duration assessment who may be encountering the odour without any prior adaptation. Given this, it may be helpful for the guidance to more clearly acknowledge that community perception of odour intensity can vary in both directions—either heightened sensitivity or reduced sensitivity—depending on factors such as duration of exposure, familiarity, expectations, and individual tolerance. Presently, the wording appears to imply that community perception will generally trend towards increased sensitivity, which may not always reflect real-world conditions. Clarifying this point could help practitioners apply the guidance more consistently and transparently, and avoid any unintended presumption that practitioner-assigned intensities should routinely be increased when considering community experience. Instead, it may be beneficial to emphasise	The text has been altered.
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the need for professional judgement on a case-by-case basis, informed by site-specific context and evidence of community response.

I hope this feedback is helpful and contributes constructively to the finalisation of the guidance.

Table A2.1	Thank you for the opportunity to review the updated guidance. It is a thorough document, and I can see that a lot of work has gone into its production. The only comment I have is regarding the Odour Intensity Scale, page 48 Table A2.1. Intensity level 2 - Faint - I don't agree that a faint odour can not be described with a level of certainty that can be linked to a particular source. Intensity Level 3 - Identifiable - the new term removes the link to the VDI 3940, which is a positive change. However, ending the description with "but it is considered to be weak" complicates understanding and reintroduces ambiguity. Since 'weak' and 'faint' have very similar meanings, I suggest ending the sentence with "...the source is likely identifiable." Also, should you require any updated images, I am sure we have some in our library that may be relevant.	The descriptors for the intensities were discussed by the working group and intentionally worded to be clearer. It is the working group's view that at an intensity level 2 it is not possible to confidently attribute a source. At intensity level 3, it is considered that odour sources are identifiable with confidence, but not strong (i.e. weak).
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Section A2	The latest EA guidance Odour-management-comply-with-your-environment-permit states: “The Environment Agency does not require you to carry out routine offsite sniff testing, even when specified in older permit conditions. You and your staff have the same constraints which apply to our officers. You are likely to: be less sensitive than many individuals in a community spend much less time in offsite neighbourhoods experience both short and long-term olfactory adaptation” The EA guidance goes on to describe chemical analytic techniques and their applications and limitations. Appendix 2 of the draft IAQM guidance and Table 6.1 (content of OMP) still reference sniff testing. Since the EA has removed the recommendation for site operators to undertake offsite sniff tests, please clarify if the IAQM’s position is whether on site staff carrying out sniff testing is still recommended, and whether other monitoring requirements should be recommended in line with the EA’s guidance.	The guidance is intended for planning, not permitting. The IAQM does not need to align with regulatory bodies. The guidance is clear that multiple assessment tools should be used and sniff-testing is considered by the working group as a highly useful tool for assessing odour.
Forward	P6 – 2 nd para, after 2014 mention the minor update in 2018	The guidance has been updated.
Section 1.1	P7 - NIEA missing from list of acronyms	The guidance has been updated.
Section 1.1	P7 – EA/Defra guidance was withdrawn but there is still some online guidance available, need to make this clearer	The guidance has been updated.
Section 1.1	P7 – 3 rd para, first mention of EIA so should be in full	The guidance has been updated.

Section 1.2	P7 – 4 th para, “Environment Agency” in full but was previously defined and referred to as EA in 1 st para.	The guidance has been updated.
Section 1.3	P7 – final para, also acknowledge that odours can affect individuals’ perception of wellbeing separately from the directly toxic effects of individual compounds.	The guidance has been updated.
Box 2.1	Noted IEMA guidance is withdrawn. Has someone confirmed IEMA still endorse use of these guidelines? Should mention IEMA has changed name to ISEP in reference list.	The guidance has been updated.
Section 2.2	1 st para, NPPF only applies in England, should acknowledge the other regimes. See IAQM Brownfield guidance section 3.5 for useful refs.	The guidance has been updated.
Section 2.2	3 rd para, “ <i>in each of the odour effects matrices</i> ” – include where these can be found.	The guidance has been updated.
Section 2.2	P16 – add caption/description to this and other photos	Suggested captions added.
Section 3.1	P17 – 1 st para, clarify “ <i>the study</i> ” – assume you mean the one for planning?	The guidance has been updated.
Section 3.1	P17 - 2 nd para – after “ <i>to predict that the impact might be</i> ” add “or compare numerical outputs for different options” [this is a key benefit of modelling].	The guidance has been updated.
Section 3.1	P17 – Add comment that if the study is to inform a planning application for a new odorous process, observations/measurements would not be available but could be based on very similar operational facilities elsewhere.	No change considered necessary, the guidance is clear that the practitioner should give justification on how assessments are undertaken.
Box 3.1	P18 – Box 3.1 – first bullet – add “subjective” before “measure of odour”. 2 nd bullet – sniff testing is not providing “monitored” levels, use a different word.	The guidance has been updated.
Table 3.1	P19 – Table 3.1 – Community surveys – replace “experiencing nuisance” with “amenity loss” as nuisance is a legal term (as per para 1.2.3)?	The guidance has been updated.

Section 4.1	P22 – 4.1 - Delete “ <i>limits set as</i> ”, just call them “ <i>numerical assessment criteria</i> ”. Acknowledge here that the latest EA guidance is silent on the need for modelling for permitting and repeat that IAQM guidance is for planning where modelling can play an important part for new development including optioneering. You could move but of section 4.5 to head this chapter?	The guidance has been updated.
Section 4.4	P25 – Para 4.4 – They are not standards, can we consistently refer to them as “assessment benchmarks/criteria”	The guidance has been updated.
Section 4.5	P25 – Para 4.5 – It said 35 years in 2018, so should this now be > 40 years? Has anything new come to light since, has this been fully explored? Add a statement to that effect?	The guidance has been updated.
Section 4.4	P26 – 7 th para – should refer to Table 4.2 not 4.1 for most offensive odours	The guidance has been updated.
Section 5	P29 – 2 nd para – consider an alternative to “ <i>needs to give the right amount of weight to the results</i> ” – such as, “ <i>needs to make a reasonable and balanced judgement using the results...</i> ” ?	The guidance has been updated.
Section 4-6	<i>Chapters 4 to 6: feels like a section on non-numerical assessment criteria is needed. Could something be included to address this apparent imbalance? Or move Ch 4 to the Appendices?</i>	Table 3 of the original guidance covered this, but working group felt it was rarely used as each main assessment tool discussed in the guidance has its own assessment matrices. Whilst Chapter 4 could be moved to appendices, it wouldn't change the overall content or value of the guidance and as such is not considered necessary.

Section 6.5	P33 – Section 6.5 – Appears to imply that an OMP is produced in response to a planning condition, whereas good practice would actually be to use this information to inform the air quality assessment itself, as well as demonstrate the developer's outline commitments to odour control at planning stage. This would then be developed in more detail once contractors have been appointed/equipment selected.	The guidance has been updated.
Table A1.1	Move Table A1.1 to after the text that introduces it. • Source magnitude - should also consider frequency of release – a single second in a year vs continuous daily release – should this be specified as part of “process activities”? • Distance from source – these splits do not seem logical, <20, 20-200, >400m would be more intuitive but what is this based on? • Type of release – include reference to temperature and flow/velocity – could have a high level but cold, low velocity release which is affected by downwash and drops out on boundary.	Amend text in Table 1.1 to cover these points. Under Process Activities added; <i>"This might include, for example, consideration to the frequency of odour releases for sources that are not continuous."</i> to cover magnitude point. Changed distances (as only indicative) and added comment to type of release.
General comment	Reformat all large tables so each sits on a single page for better readability. Dense sections of text are not suitable for a table. Try using shorter sentences/bullet points. E.g. “It may often be the case that the magnitude of odour emissions for a particular site is not known. Practitioners may be able to estimate these using previous published assessments and other published odour emissions inventories, databases and resources, but should demonstrate working and judgement in the reporting process” could become, “If odour emissions magnitude is not known for a source, consider estimating from published assessments, emissions inventories, databases and other resources; report your working and application of judgement.”	This kind of edit is not considered to enhance the usability or quality of the guidance but is simply a nice-to-have point of preference for some. In the interests of not further delaying an already long overdue update to the guidance with further re-writes, no changes have been made in relation to the tables in the guidance.

Appendix 1	P42 – 4 th para, rather than “predict the risk” replace with “evaluate/estimate the risk” – I don’t support the use of the term “predictive tool” in Table 3.1 to cover qualitative assessment.	The guidance has been updated.
Table A1.4	Table A1.4 – Are these are well maintained OCUs which are monitored to show they perform as required by their permit? (as was noted for the poultry farm)	The guidance has been updated.
Table A1.5	Table A1.5 – What is intended by “Prevailing weather conditions from source towards receptor”? Check you are happy this is in line with bullet point ii re. stable conditions. Might be helpful to make this receptor closer, and refer to % calms too in this example.	The guidance has been updated.
Section A1.2	P45 - A1.2 – 1 st para, they are not numerical “standards”, they are assessment benchmarks/criteria. Reword, “they can” to “it can”.	The guidance has been updated.
Section A1.3	P46 – A1.3 – Rephrase to “There are numerous good practice guidance documents setting out how to conduct dispersion modelling including some specifically for odour”. On reflection we should remove ref here to H4, as it’s not available online. Suggest you reference this instead https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports , which includes a note on post processing/statistical analysis.	The guidance has been updated.

General comment	Can we retain a couple of bullet points simply to highlight to practitioners certain aspects that require consideration i.e. calms/low wind speeds, emission frequency. Why remove the table on uncertainty, this is still valid?	The uncertainty guidance related to modelling. The modelling section was removed as IAQM are developing separate guidance on dispersion modelling and it was deemed unnecessary to duplicate this guidance. Whilst it is not yet confirmed when IAQM modelling guidance will be published, other guidance is available (referenced in the odour guidance) which can support modellers.
Section A1.2	P46 – first bullet, “very far from the source” – can you define this, >200m? Repeat of odour emission rates in 2 nd and 3 rd points or reword?	Wording updated to use "distant to the source" instead of very far. Precise distance will depend on source height etc. Requires application of professional judgement.
Section A1.2	P46 – Under “Which model to select”, I would start with saying which models are used in the UK. Note again, there are no odour “standards” per se. Suggest replacing throughout with “assessment benchmarks/criteria”, as described in Ch4.	The guidance has been updated regarding standards. The paragraph already sets out which types of models are used.
Section A2.1	P50 – 1 st para, include reference to what was operational on the day/at the specific time of the survey, if this is a survey of an existing odour source – with ref to Step 2 (short bursts of odours)	This is already stated in BoxA2.1
Section A2.1	P51 – Point 2, clarify - all odour intensities should be recorded, with the character of 3 or more also recorded. Point 3 – confusing, as what if odours change over time from pleasant to unpleasant?	The guidance has been updated regarding pleasantness. Recording odours of intensities less than 3 are not necessary, but practitioners may choose to do so.

Table A2.2	P52 – Table A2.2 – For Intensity 4, consider changing 3 rd Small to Medium and 2 nd Medium to Large (seems reasonable for an average intensity of 4 for over 50% of the time) – looking vertically down, check this gives progression for the 21-30% and 41-60% categories.	The updated approach and final matrix was rigorously tested by members of the working group using a large number of previous sniff testing results to check the approach.
Section A2.1	P54 – carried over sentence – can you expand to note that even so, under “worst case” it doesn’t make it more “acceptable” – might still be as unrepresentative as “best case”.	The guidance has been updated.
Section A2.1	P55 – Final bullet – shouldn’t limit to diurnal, there may be specifically timed or sporadic releases, the understanding of this is essential to a good quality test.	The guidance has been updated.
Box A2.3	Box A2.3 – Is it really correct that the majority of the population would not fall within this “narrow band”? My understanding is that it represents “normal” sensitivity so odour panel members give reliable readings.	The guidance has been updated.
Glossary	P59 – Glossary – Numerical benchmark criteria : add PHE (now UKHSE) VOC odour criteria which were published since the last update. This is the first mention of WHO so write in full, noting Organization should be spelt with a z here and also in list of acronyms	The guidance has been updated.
Glossary	P61 - error in microgram symbology here, check elsewhere	The guidance has been updated.
General comment	General point – Lots of regulations mentioned but not referenced. See Appendix C of IAQM Brownfield guidance, where we produced a single list rather than referenced throughout.	Unable to find any unreferenced sources - everything is covered by endnotes.