



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L6092/1972/12
Licence Holder	Nufarm Australia Limited
ACN	004 377 780
Application Number	APP-0029719
Premises	Street address 1 Mason Road, Kwinana Beach Legal description – Part of Lot 51 on Diagram 46722 As defined by the Premises maps attached to the Revised Licence
Date of Report	13 October 2025
Decision	Revised licence granted

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary	1
2.3 Process	1
2.4 Emissions Monitoring	1
3. Risk assessment.....	1
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors.....	2
3.2 Risk ratings.....	4
4. Consultation	6
5. Decision.....	6
6. Conclusion	6
6.1 Summary of amendments.....	6
References.....	7
Table 1: Licence Holder controls	2
Table 2: Sensitive human and environmental receptors and distance from prescribed activity	2
Table 3. Risk assessment of potential emissions and discharges from the Premises operation	5
Table 4: Consultation	6
Table 5: Summary of licence amendments	6

1. Decision summary

Licence L6092/1972/12 is held by Nufarm Australia Limited (Licence Holder) for the premises located at 1 Mason Road, Kwinana Beach (the Premises).

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L6092/1972/12 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 30 June 2025, the Licence Holder submitted an application to the department to amend Licence L6092/1972/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- To include highly active molecule (HAM) Plant vent stack with activated carbon scrubber into the list of emission points.
- Map of emission points in Schedule 1 updated

The HAM Plant vent stack was installed in 2011 and overlooked in the licence renewal in 2014.

2.3 Process

The HAM herbicide formulations consist of finely ground active ingredient particles dissolved in either aqueous or solvent based solutions that include surfactants and pH buffering agents. The active powders added to the formulation vessels are classified as Combustible Dusts and are charged using a venturi-eductor to prevent a possible combustible dust explosion.

The ventilation system consists of a 200mm horizontal header duct with branches to each of four vessels within the HAM Plant. The branches remove air and vapour that is displaced when the vessels are filled with raw materials or product from another vessel. There is a ventilation branch to a plenum fitted to a filling machine used for packaging product and additional branches to points where vapour is generated when pumping liquids from 200L drums, IBCs and when washing empty 200L drums.

Scrubber has a granulated activate carbon (GAC) filter for adsorption of emitted vapours.

2.4 Emissions Monitoring

The Licence Holder has provided the Department with stack monitoring results for the scrubber and they reveal that emissions VOCs are consistently less than a gram per second.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Solvent and active ingredient vapours	Formulation of herbicides and cleaning of reaction vessels and containers	Air/windborne pathway	Scrubber vessel with 400 mm deep GAC layer. 200mm stack that terminates 3 metres above the building roofline. Scrubber GAC is replaced every 12 months.
Solid Waste	Granulated activated carbon from filter	Direct discharge to land	Collected and taken off-site by licenced contractor.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises – Tucker Street and Bingfield Way, MEDINA	1.73km (from premises boundary)
Community Sporting Complex - Thomas Kelly Pavilion and Ovals, Rowson Place, MEDINA	1.34km (from premises boundary)
Environmental receptors	Distance from prescribed activity
Cockburn Sound	Approximately 1.77 kilometres west of premises boundary (down hydraulic gradient)

Sumpland (Resource enhancement)	Approximately 605 m southeast of premises boundary (up hydraulic gradient)
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3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L6092/1972/12 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. pesticide manufacturing activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3. Risk assessment of potential emissions and discharges from the Premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Reasoning
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Operation of HAM Plant	Emissions to air of VOCs	Pathway: Air/windborne pathway Impact: Health and amenity	Residence 1.7 km SE	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 4	<i>The delegated officer has determined that the Licence Holder's controls are sufficient and notes the large separation distance to sensitive receptors.</i>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Works Approval Holder was provided with draft amendment on 23 September 2025	The Works Approval Holder replied on 6 October 2025 waiving the resto the consultation period.	The delegated officer noted this advice.

5. Decision

The delegated officer has assessed the application and determined that the request to incorporate emission point A8 into the licence is appropriate and will not impact the risk profile of the premises. In reaching this conclusion the delegated officer has considered the following:

- A8 includes a GAC scrubber to remove any volatile organic compounds emitted.
- A8 and the scrubber have been in operation since 2011.
- The 1.7 kilometres separating the plant from sensitive receptors.
- The ongoing emission testing of A8 shows low emissions of VOCs and Ammonia.

6. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

6.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 5: Summary of licence amendments

Condition no.	Proposed amendments
Condition 4	Inclusion of HAM scrubber in Emission to air table (Table 1).
Schedule 1	Updated Figure 2 to incorporate HAM emission point

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.