



Application for Licence Amendment

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

Licence Number	L6107/1967/17
Licence Holder	CSBP Limited
ACN	008 668 371
File Number	APP-0032973
Premises	CSBP Limited Kwinana KWINANA BEACH WA 6167 Legal description – Part of Lot 20 on Diagram 78086, Volume 1918 / Folio 244 and Part of Lot 18 on Plan 17311, Volume 2058 / Folio 310 As defined by the coordinates in Schedule 1 of the Revised Licence
Date of Report	23 April 2026
Decision	Revised licence granted

MANAGER, HEAVY INDUSTRIES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Table of Contents

1.	Decision summary	1
2.	Scope of assessment	1
2.1	Regulatory framework	1
2.2	Premises overview	1
2.3	Application summary	1
2.3.1	Emergency outfall notification amendment	2
2.3.2	Mercury limit removal	2
2.3.3	Nitrogen oxides start-up restrictions	2
2.3.4	Superphosphate manufacturing plant care and maintenance	2
2.4	Licence format update	2
2.5	Part IV of the EP Act	2
3.	Risk assessment	1
3.1	Source-pathways and receptors	1
3.1.1	Emissions and controls	1
3.1.2	Receptors	1
3.2	Risk ratings	2
4.	Consultation	4
5.	Decision	4
5.1.1	Minor condition and administrative updates	4
5.1.2	Licence Duration	4
5.1.3	Emergency outfall notification amendment	4
5.1.4	Removal of 90 day rolling mercury limit	4
5.1.5	Care and maintenance provisions	5
6.	Conclusion	5
6.1	Summary of amendments	5
6.2	Licence conversion map	6
	References	8
	Appendix 1: Summary of licence holder’s comments on draft conditions	9

1. Decision summary

Licence L6107/1967/17 is held by CSBP Limited (licence holder) for the CSBP Limited Kwinana (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 L6107/1967/17 has been granted.

The revised licence issued as a result of this amendment supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

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 Premises overview

The premises operates as an integrated chemical and fertiliser manufacturing facility located in Kwinana Beach within the Kwinana Industrial area, approximately 30km south of Perth. The premises consists of several different plants which enable a range of fertiliser and chemical products to be manufactured on site.

2.3 Application summary

On 18 December 2025, the Licence Holder submitted an application to the department to amend Licence L6107/1967/17 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- a) An extension of the licence expiry date by 20 years;
- b) Restructuring of reporting requirements into tabular format with minor wording updates to match current department format;
- c) Updating report due dates and reporting deadlines to allow enough time for the licence holder to adequately assess and compile data;
- d) Update of emergency beach outfall condition requirements to reflect that use of the outfall only occurs in emergency scenarios, meaning the licence holder is generally unable to notify the department of intention to discharge;
- e) Correction of discharge limits averaging time from monthly to 90 day rolling, along with the removal of a redundant mercury discharge limit;
- f) Addition of exclusions for monitoring related to care and maintenance;
- g) Removal of requirements restricting only a single Nitric Acid Plant from initiating start-up at any one time; and
- h) Various wording and condition structure changes to improve readability or remove redundant conditions.

No changes to the aspects of the existing licence relating to Category 31, 61, 61A and 75 have been requested by the licence holder, there are no proposed changes to the throughput or design capacity of the premises. The CEO has determined to include additional department

standard complaint receipt and record keeping requirement conditions within this amendment.

2.3.1 Emergency outfall notification amendment

The licence holder outlines that the emergency beach outfall is only operated in emergency situations. Reaching compliance with the current requirement that notification be provided before use of the outfall is difficult in practicality given the time pressure relating to any scenario that the outfall would be used. Given this, the licence holder proposes that the notification of discharge from the emergency beach outfall instead be required before 5pm on the next usual business day following use of the outfall.

2.3.2 Mercury limit removal

The licence holder requests that the average daily load limit of 0.02 kg/day for Mercury be removed from the discharge limits table. The licence holder indicates that for the load limit is practically impossible to reach without also exceeding the daily concentration limit many times over, making the limit redundant.

2.3.3 Nitrogen Acid Plant start-up restrictions

The licence holder requests the removal of the existing requirement that no more than one Nitric Acid Plant (NAP) may initiate start-up at any one time. The licence holder states that the condition is redundant as current plant and personnel resources are insufficient to start-up more than one NAP. The NAPs also possess emission limits with associated control logic to automatically trip the plant if an issue occurs during start-up, thereby preventing exceedance of the licenced emissions limit.

2.3.4 Superphosphate manufacturing plant care and maintenance

The licence holder has requested that wording be incorporated into the Superphosphate Manufacturing Plant (SMP) monitoring condition to provide exclusion allowances for when the plant is in care and maintenance.

2.4 Licence format update

As part of this amendment package the delegated officer has updated the licence by transposing the requirements of the previous licence version into the contemporary licence template. The obligations of the licence holder have not changed in updating the licence.

In updating the licence, the delegated officer has:

- updated the format and appearance of the licence;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to this revised licence detailed in Table 6.

2.5 Part IV of the EP Act

The premises is regulated under Part IV ministerial statements 648, 689, 875 & 1217. The contents of these statements are not directly relevant to the proposed amendments however they have been considered during the assessment.

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
Nitrogen oxide	Nitric acid plants 1, 2 and 3 start-up.	Air/windborne pathway	L6107/1967/17 monitoring and emission limits apply.

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 holders 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	2 kilometres east of premise boundary

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 L6107/1967/17 that accompanies this Amendment Report authorises emissions associated with the operation of the premises

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 during operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	DWER determination
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls		
Simultaneous start-up of Nitric acid plants	NO _x	Air/windborne pathway causing impacts to health and amenity	Residential premises 2km east	L6107/1967/17 emission monitoring and limits.	C = Minor L = Unlikely Moderate Risk	The delegated officer considers that the existing condition can be amended and updated to improve interpretation and remove inherent redundancy. The requirement to maintain a one-hour time period between plant startups is considered sufficient to manage the risk and maintain the intent of the existing condition. The existing licence also requires that emissions during startup are monitored, and limits imposed on NO _x emissions via existing conditions are considered sufficient to manage the startup sequence for the Nitric Acid Plants.

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
Licence holder was provided with draft amendment on 4 March 2026	Comments on the draft were provided on 27 March 2026. Refer to Appendix 1.	Refer to Appendix 1.

5. Decision

5.1.1 Minor condition and administrative updates

The delegated officer considers that the requested updates associated with condition wording and clarity, report submission dates and the restructuring of licence conditions are appropriate. The licence has been updated to the contemporary licence format and restructured for ease of interpretation. The obligations on the licence holder have not changed as a result of these updates.

5.1.2 Licence Duration

The delegated officer notes that extensions to the expiry date of the licence are typically conducted through a licence review process, where all premises activities are reviewed and risks associated with these activities are re-assessed to ensure that the instrument remains valid and appropriate. In this instance, the amendment application largely considers administrative updates, and minor condition amendments, rather than a formal licence review. The delegated officer therefore considers that extending the licence expiry by 20 years not appropriate at this stage. The delegated officer has however amended the expiry date to 2031, to align the duration of the licence to 20 years, as per the *Guidance Statement: Licence duration* (2016). At the appropriate time, a licence review process can be initiated, where a further extension can be considered.

5.1.3 Emergency outfall notification amendment

The delegated officer has determined that the emergency outfall notification requirement can be amended to better reflect the likely timing and sequencing of emergency outfall events. Notification requirements are amended to require notification before 5pm on the next usual business day.

5.1.4 Removal of 90 day rolling mercury limit

The delegated officer notes that mercury is the only monitored marine discharge parameter with both a daily concentration limit and an average daily load limit. While it is noted that the average daily load for mercury did not exceed the daily load limit as reported in the 2024 and 2025 annual environmental reports for the premises, the daily concentration limit and daily contaminant loading are separate regulatory controls, with the average daily contaminant loading limit a relevant control to manage the risks associated with bioaccumulation. Given this, the delegated officer does not consider the daily average load limit to be a redundant control on the licence and considers that this limit should remain.

5.1.5 Care and maintenance provisions

The delegated officer has determined that the request to include a provision for exclusions to monitoring during periods of care and maintenance is reasonable and has incorporated this into the amended licence. A requirement to record and report these periods, where plant and infrastructure are offline during care and maintenance, has been inserted into the licence to ensure these instances are documented.

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
New	
Throughout licence	Reference to stacks/pieces of equipment with associated emissions, titles and labels updated to include / instead be 'discharge point'.
3	Condition requirements updated from: "The licence holder shall notify the CEO of any intention to discharge", to "The licence holder shall notify the CEO before 5pm on the next usual business day of any discharge".
8	References to monthly rolling average daily load limits updated to 90 day rolling average daily load limits.
9	Minor wording updates
11	Alteration to wording to simplify requirements for Nitric Acid Plan startups
15 (Table 2)	Note 1 inserted, allowing for sampling to not occur if the relevant plant is offline for the entire annual period.
18	Previous conditions combined into single condition. Minor wording updates have occurred as a result of this combination Prior Conditions: "The licence holder shall ensure that all water samples required by any conditions of this licence are conducted in accordance with the latest department approved CSBP Ground Water Operating Strategy. "The licence holder shall conduct groundwater monitoring in accordance with the latest DWER approved CSBP Groundwater strategy."
19	Condition restructured to improve clarity. Prior condition: "The licence holder shall prepare an annual groundwater monitoring report in accordance with the requirements of condition W1(b), to indicate contours calculated from measurements and samples taken from the monitoring bores details in the CSBP Ground Water Operating Strategy referred to in W1(b) and shall include data required by condition W1(b)"
24	Minor wording updates.
25 (Table 4)	Wording of acceptance specification updated at the licence holders request to improve flow

	and clarity. Previous wording: "Tankered into the premises or delivered in intermediate bulk containers (IBC), drums or other containers)."
29, 30, 31	Department standard licence record keeping and complaint receipt conditions inserted.
32	Due date of Annual Audit Compliance Report updated from 1 September to 30 September.
33	Due dates of Annual Environmental Report updated from 1 September to 30 September.
	The wording of annual reporting requirements updated as per licence holder request to improve clarity and reflect changes made in other parts of the licence. No changes have been made to Annual reporting requirements.
38	Timeframe for submission of non-conformance report extended from seven days to 14 usual business days.
	Removal of redundant condition. Prior condition: "The licence holder shall ensure that, where any of the parameters required by Condition 14 or not directly measured, then estimates shall be included and declares as such, including the source and calculation method of the estimates."
Definitions	Definitions added for mg/l, mg/m ³ , RTO, SMP, STP, USEPA Method 5 & care and maintenance.
Schedule 2, (Table 7)	Corrected mistake referencing the Superphosphate Regenerative Thermal Oxidiser Stack a "SMP" where it should be "RTO".
	Amended 2000 Ammonia plant primary reformer stack emission point abbreviation from KAP to AP2.

6.2 Licence conversion map

During the amendment process but prior to the integrated of amendments, the licence was reformatted into the current licence format. An outline of changes made during this consolidation is present within Table 6 below.

Table 6: Consolidation of licence conditions conversion map

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Definitions	Definitions table	Revised to current licence format. Moved from the beginning of conditions to the end and reformatted into a table.
N/A	Terms used throughout document	'licensee' to 'licence holder' 'shall' to 'must'	Revised to current licence term usage. Updated across entire document.
DEFINITIONS	Definitions for terms used within conditions of licence.	Definitions	Revised to current licence format, condition moved to end of licence.
G1(a), G1(b) & G1(c)	Reporting format requirements	34, 35 & 36	Updated condition number and location.
G2(a-b)	Annual environmental reporting requirements	33	Conditions combined to reflect to current licence format
G2(c)	AACR requirements	32	Revised to match current licence format.
G3(a-c)	Target exceedance reporting	37, 38 & 39	Updated condition number and location.

Existing condition	Condition summary	Revised licence condition	Conversion notes
G4(a-d)	Quality assurance program requirements	21, 22, 23 & 24	Updated condition number and location.
W1(a-d)	Groundwater monitoring program	18 and 19	Updated condition number and location.
M1	Stockpile management condition	1	Updated condition number and location.
M2(a-b)	Marine discharges	2 & 3	Updated condition number and location.
M3	Monitoring program for emergency marine discharges	7	Updated condition number and location.
M4(a-c)	Monitoring program for discharge via submarine pipeline or SDOOL	4, 5 & 6	Updated condition number and location.
M5(a-b)	Discharge limits	8 & 9	Updated condition number and location.
A1(a)	Emissions monitoring requirements	10	Updated condition number and location.
A1(b-d)	Emissions monitoring requirements	14, 15 & 16	Updated condition number and location.
A2(a-b), A4(a-b), A5(a-b), A6(a-b) & A7(a-b & d)	Air emissions monitoring requirements	14 & 15	Revised to match current format, integrated all requirements into table.
A2(c), A3(c), A4(c), A5(c) & A7(c)	Air emissions limits	17	Revised to match current format, integrated all requirements into table.
A2(d)	Nitrogen oxides monitoring	11	Updated condition number and location.
A3(a-b)	Nitrogen oxides start up limitations	12 & 13	Updated condition number and location.
WA1(a-c) & WA2	Waste acceptance control conditions	25, 26, 27 & 28	Updated condition number and location.
Attachment 1: Maps	Premises map	Schedule 1: Maps	Revised to current licence format, description for and figure reference and title inserted for Premises map (Figure 1).
2-7	Various premises maps	Figures 2-7	Figure cross-reference inserted, no other changes made.
Attachment 2	Gaseous emission points during normal operation	Schedule 2	Revised to current licence format, table cross reference inserted (Table 7).
Attachment 3	ANE Plant maps	Schedule 3	Revised to current licence format, figure references inserted for ANE Plant Location (Figure 8) and ANE Plant layout map (Figure 9).
Attachment 4	Water treatment plant maps	Schedule 4	Revised to current licence format, figure references inserted for Water Treatment Plant location (Figure 10) and Water Treatment – general layout (Figure 11).

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.

Appendix 1: Summary of licence holder's comments on draft conditions

Condition	Summary of licence holders' comment	Department's response
Draft Package 1		
Throughout licence	Incorrect cross-referencing and spelling errors throughout licence are outlined.	Licence amended to correct errors.
6	Requests the removal of analytes mentioned within this condition that don't have corresponding discharge limits under condition 8 (Chromium, Cobalt, Iron, Lead, Manganese, Nickel and Vanadium).	The department notes that despite these analytes not having discharge limits, their monitoring and reporting remains an important regulatory monitoring requirement of the licence. As a result, the department considers that they remain within the licence at this stage. Should the licence holder wish to remove these analytes from monitoring, further interrogation of these parameters (and their ongoing applicability) would need to be undertaken, and would likely require analysis of discharge history, the original basis for their inclusion within the licence, technical review and advice, and likely input from the Water Corporation, as the holders of MS655 for discharges to the SDOOL. It is recommended that this be considered within a future licence amendment, or licence review.
13	The unit g/m is incorrectly used; unit should instead be g/m ³	Licence amended to correct error.
15, Table 2	Licence holder requests "Schedule 2" should be included following "discharge point" for consistency with table 3.	Accepted, proposed amendment integrated into licence.
	Licence holder requests "Nitric Acid Plant 1, Nitric Acid Plant 2 & Nitric Acid Plant 3" to include "stacks" at the end for consistency with Schedule 2.	
	Change discharge point for "Ammonia Plant" to "Primary Reformer stack and Auxiliary Boiler stack".	
	Change discharge point for "Ammonium Nitrate Prilling Plant" to "Ammonium Nitrate Prilling Plant scrubber stack".	
	Requests wording change for Note 1 to allow for flexibility if the plant starts up in the final two months of the annual period.	
	Requests changes to Note 3 "concentration to be corrected to STP at 10% oxygen on a dry basis" on the basis that one correction is not suitable for all discharge points.	
	Remove "grab samples" from "Relevant USEPA or equivalent method grab samples" and edit the table so that the Nitric Acid Plants have their method listed as "CEMS".	Accepted, proposed amendment integrated into licence. Definition for CEMS also inserted into definitions table
17 Table 3	Update "Nitric Acid Plant 1, Nitric Acid Plant 2 & Nitric Acid Plant 3" to include the word "stacks".	Accepted, proposed amendment integrated into licence.
	Change discharge point for "Ammonium Nitrate Prilling Plant" to "Ammonium Nitrate Prilling Plant scrubber stack".	

Condition	Summary of licence holders' comment	Department's response
	Include reference to "scrubber stacks" within Discharge points for the SMP and Granulation Plant for both Hydrofluoric and ammonia limits.	
Condition 33, Table 5	Requests that "QAP's" be changed to "QAP procedures".	Accepted, proposed amendment integrated into licence.
	Within Condition 15 reporting requirement for 2008 Ammonia Nitrate Prilling Plant changed from "stack testing" to "total particulates".	
	Licence holder requests condition 15 reporting requirements have wording changed from "This monitoring report" to "Third party monitoring reports".	
Schedule 2, Table 7	Update "2008 Prilling Plant Stack" to "2008 Ammonium Nitrate Prilling Plant Scrubber Stack".	
Draft Package 2		
Throughout licence	Requests that table numbers and document reference capitalisation be corrected.	Accepted. Corrected for the final licence version.
Condition 15, Table 2	The licence holder requests provisional Note 3 be removed from the licence. The note requires that concentrations are corrected to STP at specified oxygen levels for each of the discharge points. The implementation of such changes would require significant additional work relating to engineering management such as additional monitoring sensors and new instrument calculations. Using present calculations, the results corrected to the outlined oxygen levels would have reported emissions as significantly lower than current values close to 0 or in some cases negative.	Accepted. The delegated officer notes that this requirement was introduced to seek alignment with contemporary monitoring formats, and acknowledges that in this instance, further work is required to ensure that intended detail is accurate for each discharge location. As a result, the delegated officer will defer this update to a future amendment.
Condition 25, Table 4	Requests that wording of the acceptance specification column be changed for better flow and clarity.	Accepted. The delegated officer considers that this change will not alter the intent nor outcome of the condition and has updated as requested.
Condition 33, Table 5	Requests that reference conditions for air pollution control emission monitoring requirements be updated to refer to condition 16 and 17 as well as 15.	Accepted, proposed amendment integrated into licence.
Definitions	Requests the insertion of mg/m ³ and STP into definition table.	Accepted, definitions inserted into definition table.
Schedule 1	Requests Figure titles be amended to refer to stacks as 'discharge points'.	Accepted, figure titles update in final licence version.
Schedule 2	Requests emission point abbreviation for the 2000 Ammonia plant primary reformer stack be updated from KAP to AP2	Accepted, proposed amendment integrated into licence.