



Application for Licence Amendment

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

Licence Number	L8841/2014/1
Licence Holder	CSBP Limited
ACN	008 668 371
File Number	INS-0001765: APP-0028042
Premises	<p>CSBP Geraldton Fertiliser Depot</p> <p>280 North West Coastal Highway WEBBERTON WA 6530</p> <p>Being Lot 103 on Plan 35689 and Lot 105 of Diagram 26864 as depicted in Schedule 1</p>
Date of Report	30 May 2025
Decision	Revised licence granted

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1. Decision summary

Licence L8841/2014/1 is held by CSBP Limited (Licence Holder) for a chemical blending facility (the Premises), located at 280 North West Coastal Highway, Geraldton.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during construction and operation of an additional fertiliser storage facility on the Premises. As a result of this assessment, Revised Licence L8841/2014/1 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 Background

CSBP Limited and its subsidiaries and joint ventures form the chemicals and fertilisers business units of Wesfarmers Chemicals, Energy & Fertilisers (WesCEF), which is a division of Wesfarmers Limited. The Western Australian business primarily produces agricultural fertilisers, ammonia, ammonium nitrate, sodium cyanide and other industrial chemicals.

CSBP operations includes a major facility in Kwinana, four secondary locations (Albany, Bunbury, Geraldton and Esperance) and three tertiary depots (Merredin, Tambellup and Wagin).

The CSBP Geraldton Depot is an operational fertiliser storage, blending, manufacture and despatch facility. The premises receives granular fertiliser and liquid products for the purpose of blending and/or mixing to manufacture and dispatch liquid fertiliser. Fertiliser is imported to site via the Geraldton Port, or transferred by road from the company's manufacturing facility in Kwinana.

The premises also receives industrial wash water containing fertiliser (a controlled waste) from fertiliser import activities at the Geraldton Port. Industrial wash water received at the premises is incorporated into the sites stormwater management system.

2.3 Amendment summary

On 19 March 2025, the Licence Holder submitted an application to the department to amend Licence L8841/2014/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

Due to an inability to meet demand from customers during peak periods (May to August), the Licence Holder proposes to install additional storage of liquid fertiliser (urea ammonium nitration solution, Flexi-N). The proposal, which will increase onsite storage of Flexi-N from 1,376m³ to 5,376m³, involves the construction of four 1,000m³ flexible storage tanks (bladders). Storage tanks will be situated within a lined bunded area and plumbed into the existing storage and dispatch infrastructure negating the need for any new loading/unloading infrastructure.

The amendment is limited only to changes to Category 33 activities from the Existing Licence. No changes to the overall design capacity of the premises are proposed as a result of this

amendment.

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 *Guidance Statement: Risk Assessments* (DER 2017).

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 the construction and operation of the new storage facilities 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
Construction			
Dust	Construction of the storage area including clearing, bulk earthworks and machinery movements	Air/windborne pathway	Use of water carts for suppressing dust. Soil conditioning with water prior to handling. Vegetation on the premises is expected to act as a buffer for dust emissions.
Noise		Air/windborne pathway	Works are expected to be short term duration. No nights works are proposed.
Operation			
Breach of containment resulting in product spillage	Storage of liquid fertiliser	Overland runoff or seepage into soils and groundwater	Storage bladders will be situated within a bunded area lined with 1.5mm high density polyethylene (HDPE). The bund is designed to store 110% of one of the storage tanks as well as a 1 in 100 year, 6-hour storm event (83.4mm) in addition to a 300mm freeboard.
Potentially contaminated stormwater	Overflow from Pond 1 to irrigation area	Overland runoff or seepage into soils and groundwater	Flexible storage tanks (bladders) will be located at least 2m from the interior base of the bund wall to capture spills from puncturing of the tanks. Tanks will be spaced at least 1m apart. The tanks will be connected to the existing manufacturing, storage and dispatch infrastructure. Groundwater monitoring in accordance with

Emission	Sources	Potential pathways	Proposed controls
			<p>conditions of the existing licence.</p> <p>Rainwater captured in the containment bund will be directed to Pond 2 or used in the manufacturing process as per existing Licence conditions.</p> <p>Storage of stormwater within Pond 1 and 2 is managed under the existing Licence conditions which</p> <p>During high rainfall events, overflow of Pond 2 into Pond 1, and subsequent overflow to the designated irrigation area, will occur in accordance with existing licence conditions.</p>

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), 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 (*Guidance Statement: Environmental Siting* (DER 2016)).

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

Human receptors	Distance from prescribed activity
Closest residential receptor	Approx. 170 m northwest of the proposed works, across the North-West Coastal Highway
Industrial premises	Located on the eastern premises boundary, adjacent to Pond 1.
Environmental receptors	Distance from prescribed activity
Underlying groundwater (non-potable purposes) Superficial Swan Aquifer	<p>Depth to groundwater is 8 to 12 metres below ground level (mbgl) to the Superficial Swan Aquifer, overlaying the Cattamarra Coal Measures North Aquifer. Groundwater flow is generally west to south-west towards the Indian Ocean.</p> <p>The highest recorded groundwater level at site is 1.8 mAHD and therefore a minimum vertical separation distance from groundwater of approximately 7 to 10 m is expected.</p> <p>The premises is classified as a contaminated site, based on the presence of metals, pesticides, hydrocarbons and sulfates in the soil and metals, chloride and fluoride in the groundwater beneath the site.</p>
Marine ecosystems (Indian Ocean)	< 800 m west of the proposed storage bund location
TEC – Subtropical and Temperate Coastal Saltmarsh	~3 km north of the premises

3.2 Clearing

The premises (approximately 33.6 hectares) contains a large proportion of well-established vegetation to provide a buffer between the site activities and surrounding premises. The Licence Holder has stated that some clearing is required for the installation of the bund and access road, although the vegetation to be cleared was planted by the Licence Holder and, as such, is not classified as native vegetation under Regulation 4 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations).

Vegetation planted for aesthetic/landscaping purposes, and not as a requirement of another approval or funded for the purposes of biodiversity, is not classified as native vegetation under the Clearing Regulations and does not require approval under the EP Act. Noting that there is limited evidence to dispute the Licence Holder's claim regarding the existing vegetation, the Delegated Officer considers that, ultimately, it is the Licence Holder's responsibility to determine if an exemption from requiring a clearing permit applies in this case.

The Licence Holder advised that it had no record or current approval relating to the premises that indicate that planted vegetation is a requirement of another approval, or funded for the purpose of biodiversity.

3.3 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) 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 in-complete 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 L8841/2014/1 that accompanies this Amendment Report authorises emissions associated with the construction and operation of the new facilities.

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 construction and 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				
Construction								
Construction of the storage area including clearing, bulk earthworks and machinery movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 170m west.	Refer to Section 3.1.1	C = Slight L = Unlikely Low Risk	Y	N/A	Considering the nature and scale of the works, the Delegated Officer has determined that the Licence Holder's proposed controls will adequately manage the risk of dust emissions impacting nearby receptors.
	Noise		Industrial premises to the east.	Refer to Section 3.1.1	C = Slight L = Unlikely Low Risk	Y	N/A	Noting that night works are not proposed, the Delegated Officer considers that noise emissions during construction will not pose a significant risk to nearby receptors.
Operation								
Storage of liquid fertiliser	Breach of containment resulting in product spillage and potentially contaminated stormwater	Overland runoff or seepage into soils and groundwater causing contamination of nearby soils and groundwater and impacting vegetation health.	Nearby vegetation Groundwater (RIWI) ~ 8 mbgl	Refer to Section 3.1.1	C = Minor L = Rare Low Risk	Y	New conditions authorising works (Conditions 1 – 4)	Considering the controls proposed by the Applicant, the Delegated Officer determined that the risk of a containment breach is low. Infrastructure controls are included on the works approval to ensure that containment infrastructure is constructed appropriately.
Discharge (overflow) from Pond 1	Stormwater potentially contaminated with fertiliser			Refer to Section 3.1.1	C = Minor L = Rare Low Risk	Y	New conditions authorising works (Conditions 1 – 4) Existing conditions relating to stormwater management and discharge.	Discharge to the infiltration basin has previously been assessed as low risk noting the infrequent nature of the discharge and lack of receptors. The Delegated Officer acknowledges that the new containment bund will potentially result in additional input into Ponds 1 and 2 and subsequently lead to increase frequency and volume of stormwater discharged to the infiltration area. However, the Delegated Officer considers that the risk of stormwater discharge will not significantly change as a result of the proposed works. The Licence Holder is required to manage stormwater containment to minimise discharge to the infiltration area as much as possible. The Licence currently requires the Licence Holder to report discharge events from Pond 1 to the irrigation area. The frequency of these discharge events, and associated volume and water quality, will continue to be monitored. Where there is a significant change indicating an increase to the risk profile of the premises, the Delegated Officer may elect to initiate a review of the Licence to reassess the potential risk of the emission and determine if existing regulatory controls are suitable. Reuse of stormwater within the manufacturing process is one of the measures used by the Applicant to manage overflow from Pond 1. To ensure that reuse of stormwater is maximised prior to discharging to the infiltration area, Condition 9 has been updated to ensure that onsite reuse within the manufacturing plant is utilised to its full extent to minimise potential for discharge to the irrigation area.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

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
Local Government Authority advised of proposal (8 April 2025)	The City of Greater Geraldton advised that a Development Application had been submitted for the proposal. Although a determination is yet to be made, the City advised that there are not likely to be any issues.	Noted. The Delegated Officer has determined to grant the amended licence authorising the works prior to the Development Application being determined noting that it is the responsibility of the Licence Holder to comply with any relevant planning approvals.
Licence Holder was provided with draft amendment on 1 May 2025	Refer to Appendix 1	

5. 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.

The Revised Licence authorises construction of the storage facility subject to requirements aligned with the Licence Holder's commitments for containment and stormwater management. Once construction, operation of the facility is authorised by the existing Licence conditions.

5.1 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
Front cover	Extension of expiry date
1 and 2	Inclusion of new condition authorising the works.
3 and 4	Inclusion of requirement to submit an Environmental Compliance Report once works are completed.
9 (Table 7)	Wording relating to emergency overflow discharge altered to ensure that reuse within the manufacturing plant is exhausted prior to discharge occurring.
Definitions	Definitions included for 'Environmental Compliance Report', 'suitably qualified engineer' and technical specification definitions.
Schedule 1: Maps	Figure added showing the location of the works.

As part of this amendment package the department has converted the licence to the new format, with existing conditions being transferred, but not reassessed, to the new format.

The obligations of the Licence Holder have not changed in transferring the licence to the new format. The department has not undertaken any additional risk assessment of the Premises related to previous amendments.

The full conversion of licence conditions as they relate to this Revised Licence are detailed in Table 6.

Table 6: Conversion summary.

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Prescribed Premises Category	N/A	Revised to current licensing format. Moved from Schedule 2.
1.1.1 and 1.1.2	Interpretation and definitions	Interpretation section, Definitions (Table 11)	Redundant condition. Revised to current licensing format.
1.1.3	Australian or other standard	Interpretation section, Definitions (Table 12)	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	Interpretation section, Definitions (Table 12)	Redundant condition. Revised to current licensing format.
1.1.5	Unauthorised emissions	Interpretation section	Redundant condition. Revised to current licensing format.
1.2.1	Pollution control and monitoring equipment	N/A	Redundant condition. Adequately covered by alternative existing conditions. Deleted from licence.
1.2.2	Recovery and removal of spills	N/A	Redundant condition. Adequately covered by <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> . Deleted from licence.
1.2.5	Prevention of contamination and containment of contaminated stormwater	N/A	Redundant condition. Adequately covered by alternative existing conditions and proposed new conditions. Deleted from licence.
1.3.1 Table 1.3.1	Waste acceptance	Condition 7, Table 6	Revised to current licensing format.
1.3.2 Table 1.3.2	Waste processing	Condition 8, Table 6	
1.3.3 Table 1.3.3	Containment infrastructure	Condition 5, Table 3	
1.3.4	Operational requirement for containment infrastructure	Condition 6, Table 4	
2.1.1 Table 2.1.1	Emissions to land	Condition 9, Table 7	New numbering.
3.1.1 to 3.1.4	General monitoring	Conditions 11 – 14	

Existing condition	Condition summary	Revised licence condition	Conversion notes
3.2.1 Table 3.2.1	Monitoring of emissions to land	Condition 15, Table 8	
3.3.1 Table 3.3.1	Monitoring of inputs and outputs	Condition 16, Table 9	
3.4.1 Table 3.4.1	Ambient environmental quality monitoring	Condition 17, Table 10	
4.1.1	Records	Condition 19 - 20	Revised to current licensing format.
4.1.2	Maintaining copy of the licence	N/A	Redundant condition. Deleted from licence.
4.1.3	Annual Audit Compliance Report	Condition 21	Revised to current licensing format.
4.1.4	Complaints management	Condition 18	
4.2.1 and 4.2.2	Annual Environmental Report	Condition 22	
4.2.3	Non-annual reporting	N/A	Redundant condition. Deleted from licence.
4.3.1	Notification	Condition 10	Revised to current licensing format.
Schedule 1: Maps	No change		
Schedule 2	Prescribed Premises Categories	Cover page	Revised to current licensing format.
Schedule 3	Reporting forms	N/A	Redundant attachment. Deleted from Licence.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. DER 2015, *Guidance Statement: Licence Duration*, Perth, Western Australia.
3. DER 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
4. DWER 2017, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Department of Water (DoW) 2013, *Water Quality Protection Note 26: Liners for containing pollutants, using synthetic membranes*, Perth, Western Australia.

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Cover page	Requested that the Licence expiry be extended until 2034; 20 years from the initial date of issue.	The Delegated Officer has elected to extend the duration of the licence such that the total duration is 20 years. In making this determined the Delegated Officer has had regard for the <i>Guidance Statement: Licence duration</i> (DER 2016) and noting that the overall risk of the premises is considered to be low.
Cover page	Name of premises amended to "CSBP Geraldton Fertiliser Depot"	Accepted and update made
Condition 1	Change to <i>The licence holder must construct and/or install the infrastructure and/or equipment:</i> <i>(a) in accordance with the corresponding design and construction / installation requirements; and</i> <i>(b) at the corresponding infrastructure location,</i>	Delegated Officer accepted the change noting that this is an administrative amendment and does not alter the intent of the condition.
Condition 1, Table 1 (b – i)	Insert "thick" as follows: <i>with a 1.5mm thick, high density polyethylene (HDPE) liner that meets the requirements of condition 2;</i>	Accepted.
Condition 1, Table 1 (b – iii)	Insert "calculated at the time of construction" noting that rainfall statistics may change over the life of the proposed containment bund. <i>with capacity to store 110% of one of the storage tanks as well as a 1 in 100 year, 6-hour stormwater event (calculated at the time of construction) and a 300mm freeboard; and</i>	Accepted although the Delegated Officer considering this does not change the intent of the condition and noting that rainfall statistics are unlikely to change significantly during the construction period, which is expected to be relatively short term.
Condition 2	Insert bold wording below noting that other lined assets may be subject to different requirements: <i>The licence holder must ensure all HDPE liners used in the construction of the containment bund referred to in Table 1, comply with the properties listed in Table 2 and are constructed in accordance with the requirements specified in that table.</i>	Accepted to provide additional clarity.
Condition 2, Table 2	Alter the test methods for liner properties as follows: <ul style="list-style-type: none"> Specific gravity: ASTM D1505 changed to ASTM D792; and Carbon black content: ASTM D1603 changed to ASTM D4218. Alter the minimum elongation at break specification from 300% to 150%	The Delegated Officer notes that the proposed test methods are suitable alternatives and has amended the condition accordingly. Liner specifications were derived from <i>Water Quality Protection Note 26: Liners for containing pollutants, using synthetic membranes</i> (DoW 2013) and relate to liners being used as primary containment for waste storage facilities. The Delegated Officer considers that revised specifications are suitable for ensuring the liner is fit for purpose as secondary containment for a low risk fertiliser storage facility.
Condition 3	Extend the submission date for the compliance report by 30 days to allow time to collate information and evidence from suppliers.	Accepted.

Condition	Summary of Licence Holder's comment	Department's response
Condition 3 and 6	Correct administrative and typographical errors.	Accepted
Condition 21 and 22	Alter the date for submission of the Annual Audit Compliant Report and Annual Environmental Report from May to June each year to allow additional time for the collation of data.	Accepted.
Schedule 1 – Map of proposed works	Map updated to include an extended roadway associated with the storage facility. The new road alignment reduces the overall scale of the proposed works utilising an existing roadway and therefore reduced clearing requirements.	Noted and updated map inserted.