



Application for Licence Amendment

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

Licence Number	L4476/1984/12
Licence Holder	Fremantle Port Authority
Application Number	APP-0031656
Premises	Kwinana Bulk Terminal Riseley Road, KWINANA BEACH WA 6167 Legal description – Lot 452 on Plan 220690, Part of Lot 11 on Deposited Plan 39572 and Lot A within Lot 251 and Lot C within Lot 250 on Deposited Plan 415974 As defined by the Premises maps attached to the Revised Licence
Date of Report	28 November 2025
Decision	Revised licence granted

MANAGER, HEAVY INDUSTRIES

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

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1. Decision summary

Licence L4476/1984/12 is held by the Fremantle Port Authority (Licence Holder) for the Kwinana Bulk Terminal (the Premises), located at Riseley Road, Kwinana Beach.

The amendment is largely administrative in nature, relating to the transfer of infrastructure and operational controls from Works Approval W6427/2020/1 (works approval) to Licence L4476/1984/12 following the completion of works under the works approval. As a result of this assessment, Revised Licence L4476/1984/12 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 1 October 2025, the Licence Holder submitted an application to the department to amend Licence L4467/1984/12 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is to include the cement clinker import circuit infrastructure constructed and currently operated under Works Approval W6427/2020/1. A compliance document with engineering certification was received on 12 June 2025. A review conducted by the department determined that compliance was demonstrated, with no deviations from the works approval infrastructure.

As part of this amendment the boundary of the prescribed premises is to be changed to allow an easement for the clinker conveyor operated by Cockburn Cement Limited under licence L8683/2012/2.

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.

The risk assessment associated with the construction and operation of the cement clinker import circuit was conducted as part of the works approval assessment (and associated amendments). The works approval included conditions to manage risks during construction and for the operation of the additional equipment (as applied during amendment granted 12 September 2024). This amendment considered and applied specific controls for the operation of the new infrastructure, recognising that existing controls under the licence were also relevant and appropriate controls to manage the risk.

As no changes are proposed with the ongoing operation of the cement clinker import circuit, and the import circuit infrastructure has been installed and certified as meeting the requirements specified in Works Approval W6427/2020/1, the delegated officer considers the risks associated with this infrastructure have not changed, and as result, has not conducted a further risk assessment associated with this licence amendment. Conditions imposed via the works approval have been transferred to the licence to ensure the ongoing management and control of the risks identified. An excerpt of the relevant works approval decision document (associated with the risk assessment for operation) is included as Appendix 1 for ongoing reference.

4. Consultation

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

Table 1: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 21 November 2025	The licence holder replied on 26 November with the following comments: 1. Request the removal of conditions 26, 27 and 28 as they are redundant construction conditions. 2. Request use of Attachment 2 of the application to replace Figures 2, 3, 4 and 5. 3. Request removal of item at Schedule 3, Table 1 Row 11 item (c). Requirement to visually inspect T12 and surroundings for dust. This is covered by other provisions of the licence.	The Delegated Officer notes the requests and responds: 1. The construction work is completed and a compliance report was submitted 15 November 2023. The licence holder was found to be compliant. The conditions have been removed. Table numbers have been updated. 2. Attachment 2 contains all the required details and has been used to replace the multiple figures. 3. The delegated office agrees to the removal of this condition. The requirement is made redundant by items 10 and 11(b) of Schedule 3.

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.

In completing the amendment, the delegated officer has updated the infrastructure tables within the licence and transferred operational controls from the works approval to the licence. The premises boundary has also been updated.

5.1 Summary of amendments

Table 2 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 2: Summary of licence amendments

Condition no.	Proposed amendments
Schedule 1 Figure 1	Updated Schedule 1 Figure 1 to show new prescribed premises boundary.
Schedule 1 Figure 2	Inserted Schedule 1 Figure 2 to replace Figures 2, 3 and 4 in original licence
Schedule 2 Table 6	Updated Table 6 to include cement clinker import circuit infrastructure.
Schedule 3 Table 9	Updated Table 8 to include cement clinker import circuit infrastructure and operating requirements.
Condition numbering	Updated throughout
Definitions table	Updated as required.

6. 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: Excerpt of Amendment Report for W6427/2020/1

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Application for Works Approval Amendment

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

Works Approval Number	W6427/2020/1
Works Approval Holder	Fremantle Port Authority
File Number	DER2020/000324~3
Premises	Kwinana Bult Terminal 1 Riseley Road NAVAL BASE WA 6165 Legal description – Lot 452 on Deposited Plan 220690, Part of Lot 11 on Deposited Plan 39572 and Lot A within Lot 251 and Lot C within Lot 250 on Deposited Plan 415974
Date of Report	12 September 2024
Decision	Revised works approval granted

Decision summary

Works Approval W6427/2020/1 is held by Fremantle Port Authority (Works Approval Holder) for the Kwinana Bulk Terminal (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 Works Approval W6427/2020/1 has been granted.

Scope of assessment

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>.

Application summary and overview of premises

On 10 June 2024, the Works Approval Holder submitted an application to the department to amend Works Approval W6427/2020/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- To include commissioning of the Cement Clinker Import Circuit infrastructure; and
- To include time-limited operation (TLO) conditions to the Works Approval.

The cement clinker import circuit is being constructed to replace aging infrastructure and provide a modern facility to import bulk granular material including cement clinker and granulated slag at the premises. The import circuit will be used to unload approximately 50% of the imported cement clinker and granulated slag directly to the adjacent Cockburn Cement (CCL) facility by conveyor, with the remainder being loaded into trucks for transport off-site to a BGC facility.

Overview of operations

Cement clinker will be unloaded via an existing ship unloader and transported along existing conveyors from the JC01 conveyor via transfer tower T1 to IC01 conveyor (to be renamed IC01A). The product will be transported from IC01A to the infrastructure listed on W6427/2020/1 in the following sequence: Transfer tower T12 (IC01A/CC01), CC01 conveyor, transfer tower T14 (CC01/CC02/CC04) and transported by CC02 conveyor to the import storage dome or alternatively transported by CC04 conveyor to the CCL transfer tower (located within the CCL lease area). Cement clinker will be transported from CCL transfer tower to CCL's conveyor into CCL's adjacent prescribed premises.

The cement clinker stored in the import storage dome (40,000 tonnes capacity) will be reclaimed using the CC03 conveyor and transported to the truck load-out facility. The import storage dome has a series of reclaim chutes along the centerline for gravity reclaim that feed CC03 conveyor. Front end loaders will be used in the import storage dome to recover the remaining product into the chutes after gravity drawdown, when required (i.e. changing from grey to white cement clinker). At the truck loadout facility, cement clinker will be temporarily stored in a hopper (200 tonnes capacity) and be loaded into trucks using three telescopic discharge chutes with loading controlled by a weighbridge.

CCL's granulated slag imports will follow the same process flow as described for cement clinker, except that it will bypass the import storage dome and be transported along CC04 to the CCL transfer station in CCL's leased area. Granulated slag imported for BCG will follow the existing import circuit route and be stored in the existing granulated slag stockpile.

Proposed environmental commissioning

The proposed commissioning works will take place in three stages:

- Pre-commissioning, where the works will be systematically assessed for completeness and readiness to be dry commissioned during the construction phase. Pre-commissioning is conducted in parallel to construction (where possible) to reduce the duration required to complete the final wet commissioning stage. All infrastructure noted in the Works Approval must be pre-commissioned.
- Dry commissioning, where electrical power is connected, and preliminary functional checks of individual items of equipment are completed during the construction phase with no bulk material flow. The objective is to conduct this stage in parallel to construction (where possible) to reduce the duration required to complete the final wet commissioning stage. Actions will relate to functional checks of all dust collection units for operation and airflow. All infrastructure noted in the Works Approval must be dry commissioned.
- The wet commissioning stage involves testing the full operation of all equipment and control systems under various conditions and modes of operation. The control systems are run through all their sequence of operation and the response of the components recorded and verified. Wet commissioning extends from components to sub systems to systems and finally to interlocks and connections between systems.

Wet commissioning will see the introduction of cement clinker and granulated slag to the works and is proposed to include the complete unloading of at least two full ships of product for each of the two customers; CCL and BGC (four ships). Typically, this will be a minimum of 60,000 tonnes for each customer from two ships. All infrastructure noted in the Works Approval is to be wet commissioned.

Following a review of the proposed commissioning works, the Delegated Officer has determined that the proposed wet commissioning works do not meet the department's definition of 'environmental commissioning' given there will be no optimising (and validating) of any process or emission source to demonstrate that it meets predicted emissions. Rather, the proposed wet commissioning is intended to test all systems and components of the plant and equipment have been built and installed correctly and are operational according to the specifications of the plant or equipment. This is considered to be standard engineering commissioning.

Further, given the wet commissioning requires the handling, transport and loading of cement clinker and granulated slag, the process is considered to be standard operation and therefore will be regulated under time-limited operations.

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 2020a).

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.

Source-pathways and receptors

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 Works Approval Holder has proposed to assist in controlling these emissions, where necessary

Table 1: Works Approval Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Product movement through transfer and conveyors (cement clinker, granulated slag) Product handling at truck load out station and import storage shed (cement clinker, granulated slag)	Air/windborne pathway	Sweeper truck to remove dust, spilt and accumulated material from all trafficable areas within the prescribed premises. Water cart onsite and operational to wet all trafficable areas within the prescribed premises. Long distance of operations from the nearest sensitive receptors. Inspected by on-site personnel. Total suspended particles (TSP) boundary dust monitoring network and reporting in accordance with licence L4476/1984/12. Real-time dust alarms on TSP boundary dust monitors in accordance with licence L4476/1984/12. Reportable event criteria of <260ug/m3 /day on licence L4476/1984/12. Construction Environmental Management Plan to be provided by contractor and approved by Fremantle Ports prior to works commencing. Product will be loaded using a weighbridge reducing spillage due to overloading. Pre-commissioning and Dry commissioning phases complete. Wet commissioning actions to be completed. Adequate moisture content of granulated slag on arrival to berth (4-6%) reducing potential for dust lift off from product.
Noise	Product loading and transfer	Air/windborne pathway	Long distance of operations from sensitive receptor Incident, hazards and complaints management program. OHS noise limits and personnel noise monitoring program.
Surface water runoff	Contaminated stormwater	Direct discharge	Site stormwater drainage network (no discharge to Cockburn Sound). Stormwater drainage network inspected by site personnel. Incident, hazards and complaints system.

Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020a), the Delegated Officer has excluded employees, visitors and contractors of the Works Approval 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 2020b)).

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

Human receptors	Distance from prescribed activity
Closest residential receptor	3,130 m to the south-east
Closest industrial receptor	600 m to the north-east
Environmental receptors	Distance from prescribed activity
Cockburn Sound (marine waters)	Within and directly adjacent to the premises
Groundwater area proclaimed under <i>Rights in Water Irrigation Act 1914</i>	Lies within and surrounded by Cockburn Groundwater Area. Groundwater monitoring (2007) resulted in <i>Contaminated site – restrictive use classification</i> .

Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020a) for those emission sources which are proposed to change and considers 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 Works Approval 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 Works Approval Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the Works Approval 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 Works Approval W6427/2020/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence amendment is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises i.e. bulk materials loading and unloading activities. A risk assessment for the operational phase has been included in this Amendment Report, however licence conditions will not be finalised until the department assesses the licence amendment application.

Table 3. Risk assessment of potential emissions and discharges from the premises during operations

Risk Event					Risk rating ¹ C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Works Approval Holder's controls				
Time-limited operations (including proposed wet commissioning operations)								
Product movement through transfer and conveyors (cement clinker and granulated slag) Product handling at truck load-out station, storage shed (cement clinked, granulated slag) Truck movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences about 3 km from premises	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 6 - Time limited operations requirements Condition 7, 8 - Time limited operations compliance reporting	N/A - The Delegated Officer is satisfied the proposed controls, in addition to existing controls on licence L4476/1984/12, are sufficient to mitigate the risk to an acceptable level during time limited operations. As such, no additional controls have been specified on the amended works approval.
	Noise			Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	N/A	N/A - The Delegated Officer considers the risk to be low due to the separation distance to sensitive receptors and notes that the <i>Environmental Protection (Noise) Regulations 1997</i> are sufficient to mitigate potential impacts to the industrial office about 600 m from the proposed activity. No noise controls have been specified in the amended works approval.
	Contaminated stormwater runoff	Direct discharge to Cockburn Sound resulting in adverse impacts on water quality and marine ecology	Cockburn Sound waters and marine environment	Refer to Section 3.1	C = Minor L = Unlikely Low Risk	Y	Condition 6 - Time limited operations requirements Condition 7, 8 - Time limited operations compliance reporting	N/A - The Delegated Officer is satisfied the proposed controls, in addition to existing controls on licence L4476/1984/12, are sufficient to mitigate the risk to an acceptable level during time limited operations. As such, no additional controls have been specified on the amended works approval.

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

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

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 5 August 2024	Detailed in original amendment report.	Detailed in original amendment report.

Conclusion

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

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 Works Approval as part of the amendment process.

Table 5: Summary of works approval amendments

Condition no.	Proposed amendments
4 - 8	Time limited operations conditions have been added to allow time limited operations for up to 180 calendar days.
Definitions	Definitions have been added for 'time limited operations'