Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence

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

Licence Number	L8662/2012/2
Applicant	CSBP Limited
ACN	008 668 371
File number	2012/002609-1
Premises	CSBP Esperance Depot 146 Shelden Road CHADWICK WA 6450 Legal description - Lot 901 on Deposited Plan 48785 Certificate of Title Volume 2672 Folio 82 As defined by the coordinates in Schedule 1 of the licence
Date of report	19 November 2025
Decision	Licence granted

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1. Decision summary

This amendment report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, revised licence L8662 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this amendment report, the Department of Water and Environmental Regulation (the department; DWER) 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 6 August 2025, CSBP Limited (CSBP, the applicant) submitted an application for a licence amendment to the department under section 57 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 the installation of additional liquid fertiliser (urea ammonium nitrate solution, Flexi-N) storage. The proposal, which will increase the onsite storage capacity of Flexi-N from 1,690m^3 to 5690m^3, involves the construction of a HDPE lined bunded storage area and the installation of four 1,000m^3 Labaronne Citaf flexible storage tanks (bladders). Storage tanks will be plumbed into the existing storage and despatch infrastructure negating the need for any new loading/unloading infrastructure. The proposal does not result in any increase to the annual throughput of the facility.

The applicant has also requested formatting and wording changes for consistency with other CSBP licences. These changes reflect existing premises operations however have the effect of imposing new conditions at CSBP's request, and removing conditions related to dust and stormwater emissions. To facilitate this request, dust and stormwater emissions from general premises operations has also been considered in this assessment.

The premises relates to category 33 and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L8662. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L8662.

2.3 Premise background

The CSBP Esperance Depot initially licenced in 2012 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 the site via the Esperance Port or transferred by road from the Kwinana manufacturing facility.

The premise 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 and managed by the sites stormwater management system, which feeds into the Flexi-N manufacture process.

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 construction and operation which have been considered in this amendment report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of storage area including earthworks and machinery movements	Air / windborne pathway	Water carts will be used to pre-soak dusty soil prior to construction activities. Vegetation on the premises is expected to act as a buffer for dust emissions.
Noise			Works are expected to be short term in duration. No night works are proposed.
Commissioning			
Spills, leaks and loss of containment	Failure of storage infrastructure	Overland runoff or seepage into soils and groundwater	The commissioning activities will first occur in a dry phase with vacuum testing of field and factory welds within bund. Following this dry commissioning a wet commissioning phase will occur with Flexi-N liquid fertiliser product being passed through the system while under observation for leaks.
Operation			
Spills, leaks and loss of containment Potentially contaminated stormwater	Storage of liquid fertiliser Storage of industrial washwaters Fertiliser manufacture and general site operations.	Overland runoff or seepage into soils and groundwater	Storage bladders will be situated within an above ground bunded area possessing: i. 0.9m high bund wall including 300mm of freeboard; ii. 1.5mm high density polyethylene (HDPE) lining; and iii. the capacity to contain 110 per cent of one flexible tank and a 1 in 100-year rainfall event resulting in 85.4mm of rainfall over a six-hour period. Storage bladders will be located at least 2m

Emission	Sources	Potential pathways	Proposed controls
			from interior base of the bund wall to capture spills from tank punctures. Storage bladders are not pressurised and are not expected to spray or shoot liquids beyond the bund wall. Bunded area will be connected to existing premises stormwater and monitoring infrastructure including 2 drainage soaks and 10 groundwater monitoring bores. Groundwater and surface water monitoring under existing licence conditions. Operations occur within an approximately 12,000m2 shed which prevents water ingress. Industrial wash waters are received in a bunded hardstand area capable of preventing surface run-off from entering the environment.
Dust	Fertiliser manufacture and general site operations.	Air	Blending activities are conducted within enclosed sheds. Mobile, telescopic loading chutes transfer fertiliser directly into trucks under an awning. Roller doors are closed to further reduce potential dust emissions.

3.1.2 Receptors

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

Table 2below 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	800m east of proposed works area.
Industrial premises	Adjacent to premise boundary, 300m west from proposed works area.
Environmental receptors	**Distance from prescribed activity**
Priority 3 threatened ecological community (Proteaceae Dominated Kwongkan Shrublands of the Southeast Coastal Floristic Province of Western Australia)	Present within premise boundary adjacent to proposed works area.
Threatened Flora and Fauna	Reported as likely to occur within the area covered by premise boundary and adjacent

	areas.
Underlying groundwater (non-potable purposes)	5 meters below ground level.

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source 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 applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L8662 that accompanies this amendment report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 3 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 events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Construction of bunded area and stormwater channels	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 800m east, adjacent industrial premises and native vegetation present within premise	*Refer to Section 3.1.1,* Table 1	C = Slight L = Unlikely **Low Risk**	Y	N/A	The license holder's proposed controls are considered sufficient to effectively manage the risk posed. No further controls deemed necessary
	Noise			*Refer to Section 3.1.1,* Table 1	C = Slight L = Unlikely **Low Risk**	Y	N/A	Factors such as distance to receptors and relatively short timeframe of construction activities are considered by the delegated officer. No further controls are deemed necessary.
Commissioning								
Commissioning of containment infrastructure	Spills, leaks and loss of containment	Overland runoff or seepage into soils and groundwater causing contamination of nearby soils and groundwater and impacting vegetation health	Adjacent industrial premises Threatened ecological community present within premise boundary Groundwater ~5mbgl	*Refer to Section 3.1.1,* Table 1	C = Minor L = Unlikely **Low Risk**	Y	N/A	The delegated officer considers the construction and testing requirements outlined within licence conditions sufficient to manage risks posed by potential containment failure during commissioning.
Operation								
Storage of liquid fertiliser within bladders. Storage of industrial washwaters Fertiliser manufacture and	Spills, leaks and loss of containment	Overland runoff or seepage into soils and groundwater causing contamination of nearby soils and groundwater and	Adjacent industrial premises Threatened ecological community present within	*Refer to Section 3.1.1,* Table 1	C = Minor L = Unlikely **Medium Risk**	N	New conditions authorising works (Conditions 1-3). Existing conditions 8-15.	The delegated officer has determined to condition the construction of the bunded area to levels established in similar approvals. Construction of the bund to these standards alongside
	Contaminated				C = Insignificant	N		

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
general site operations.	stormwater	impacting vegetation health.	premise boundary Groundwater ~5mbgl		L = Possible **Low Risk**			the existing licence condition 8 through 15 are determined to effectively manage risk.
Fertiliser manufacture and general site operations.	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 800m east, adjacent industrial premises and native vegetation present within premise	*Refer to Section 3.1.1,* Table 1	C = Slight L = Unlikely **Low Risk**	Y	N/A	The delegated officer considers that the infrastructure controls sufficiently mitigate the risk of dust emissions from the premises. Neither the licence holder nor DWER have received any dust related odour complains over the last decade, indicating these existing controls are likely sufficient. The licence holder is also subject to the general provisions of the EP Act.

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

Note 2: Proposed applicant 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
Shire of Esperance advised of proposal on 9 September 2025.	None received	N/A
Applicant was provided with draft documents on 20 October 2025, and revised draft documents on 11 November 2025.	Refer to Appendix 1	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

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

Condition no.	Proposed amendments
Front cover	Date of issue updated to reflect amendment and premise name updated to reflect applicant comments.
Licence history	Reference to current amendment added.
1 & 2	Inclusion of conditions authorising and outlining requirements for proposed works.
3 & 4	Inclusion of requirement to submit an Environmental Compliance Report upon the completion of works.
6 & 7	Conditions relating to dust emissions are removed, commensurate with the risk assessment.
5, 6, 7, 8, 9, 10 & 11	Waste acceptance and monitoring conditions restructured to reflect licence L8841 CSBP Fertiliser Depot Geraldton.
12, 13, 14, 15 & 16	Record and reporting conditions reformatting in different order to improve readability and reflect licence L8841 CSBP Fertiliser Depot Geraldton.

Definitions	Definitions included for relevant ASTM standards, 'Environmental Compliance Report' and 'suitably qualified engineer'.
Schedule 1: Maps	Figure added showing the location of proposed works.

References

Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.

1. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
2. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
3. DWER 2021, Most recent issuance of L8662/2012/2, Perth, Western Australia.

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

Condition	Summary of applicant's comment	Department's response
Front cover	Requests the premise name be updated to CSBP Esperance Fertiliser Depot from CSBP Esperance Depot	Accepted and update made.
1	Request condition be updated to have wording reflect approval L8841.	Accepted and update made with the addition of new condition and table for HDPE liner properties.
	Request condition 1 be split into two conditions with the second outlining HDPE liner requirements.	
2 (now 3)	Requests time limit given to submit compliance report for infrastructure outlined within table 1 be extended from 30 days to 60 days.	Accepted and length extended
4 & 5	Requests the restructuring of conditions into table format to better express waste types accepted and associated limits and/or specifications to bring the licence in line with L8841.	The proposed changes incorporate additional applicant commitments relating to waste acceptance and handling and as such are accepted by the department without additional risk assessment.
6 & 7	Requests the removal of conditions 6 & 7 which relate to managing premise dust emissions. The applicant justifies this proposed removal stating engineered controls in the form of existing site infrastructure (activities occurring within enclosed sheds, telescopic loading chutes being used, etc.) and separation distance to nearest receptors sufficiently manages dust emissions.	Dust emissions from general operations has been incorporated into the risk assessment and determined to be low risk. The licence holder's infrastructure controls are considered sufficient and so these conditions have been removed.
8 & 9 (now 9)	Requests restructuring of conditions 8 & 9 into a single consolidated condition with a table outlining requirements to bring the licence in line with L8841.	One new proposed condition has been added to reflect similar structuring of L8841. The proposed changes incorporate additional applicant commitments and as such are accepted by the department without additional risk assessment. This new condition is not considered to directly replicate previous Conditions 8 & 9 which required actions to be taken to prevent stormwater becoming contaminated. Stormwater from general operations has been incorporated into the risk assessment and determined to be low risk. The licence holder's infrastructure controls are considered to be sufficient to meet the requirements of these conditions and so these conditions have now been removed.
9 (now 10)	Request to include to reflect conditions in L8841.	The proposed changes incorporate additional applicant commitments relating to waste monitoring and as such

Condition	Summary of applicant's comment	Department's response
		are accepted by the department without additional risk assessment.
11	Request condition be updated to have wording reflect approval L8841.	The proposed change is deemed to not materially change the requirements of the licence and has been accepted.
12 & 13 (now 8)	Requests the consolidation and moving of these conditions into a single larger condition with bullet points to outline testing requirements to bring the licence in line with L8841.	The proposed change is deemed to not materially change the requirements of the licence and has been accepted.
14, 15, 16, 18 & 19 (now 12-16)	Requests the reformatting of record and reporting conditions into two distinct sections with subheadings of 'Records' and 'Reporting' with conditions rearranged to be present in equivalent associated section.	The proposed change is deemed to not materially change the requirements of the licence and has been accepted.
19 (now 16)	Requests the change of yearly due date of reporting requirements from 31 August to 30 September alongside the reformatting of Annual Environmental Report table to reflect above mentioned changes in the licence.	The proposed changes to the reporting requirements due date and table formatting is considered administrative and accepted.