



Application for Licence Amendment

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

Licence Number	L8669/2012/2
Licence Holder	CSBP Limited
ACN	008 668 371
File Number	APP-0031102 & INS-0001808
Premises	CSBP Albany Fertiliser Depot 198 Hanrahan Road, Albany WA, 6330 Legal description – Part Lot 211 on Plan 416231 Certificate of Title Volume 2818 Folio 699 As defined by the Premises map attached to the Revised Licence
Date of Report	22 December 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 L8669/2012/2 is held by CSPB Limited (Licence Holder) for the CSBP Albany Fertiliser Depot (the Premises), located at 198 Hanrahan Road, Albany 6330.

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 construction and operation of the Premises. As a result of this assessment, Revised Licence L8669/2012/2 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 9 September 2025, the Licence Holder submitted an application to the department to amend Licence L8669 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Amendment to the licence relating to planned construction and subsequent operation of an upgraded discharge weir and monitoring facility.
- Amendment to reflect decommissioning and removal of existing weir.

The weir present at the premises was put in place to allow for the completion of the Albany ring road realignment which necessitated CSPB selling a portion of the site to Main Roads WA (MRWA). Following the completion of the weir the licence holder identified seasonal ingress of groundwater during late spring/early summer.

The licence holder has identified the current temporary weir to be not fit for purpose due to seasonal ingress of groundwater. The groundwater ingress occurs when the groundwater table is at its peak around late spring/early summer through seems between concrete segments of the temporary weir.

The applicant proposes that the licence be amended to allow for the construction of a new permanent weir and monitoring facility alongside the decommissioning and removal of existing temporary weir. The applicant plans to construct the permanent weir using an in situ concrete pour and forming construction method. This design change will stop groundwater ingress by making the weir impermeable.

2.2.1 Groundwater seepage during construction works

Due to the depth to groundwater and the current issues regarding ingress of groundwater, the licence holder expects that groundwater will likely be intercepted during the proposed works.

The average standing water level during warmer months (December to March) at the closest bore to the proposed works area is 6.7 m AHD and the proposed depth of the excavation for the works is approximately 6.0 m AHD. The licence holder considers that although this indicates 0.7 m drawdown may be required to conduct the works, previous works in the same area under W6465/2020/1 successfully managed groundwater seepage via trench grading and sump pumping. For the proposed works, the licence holder is proposing to manage groundwater seepage via the existing unlined pond and stormwater management system.

2.3 Premises background

CSBP Albany Fertiliser Depot on-site activities include the receipt (import via Albany Port or transferred by road from the company's manufacturing facility in Kwinana), storage, blending and dispatch of granular fertilisers. The nominated throughput for fertilisers temporarily stored and/or blended prior to dispatch at the facility is 416,000 tonnes per year.

Lined drains on the site direct stormwater to a lined pond. Captured stormwater may contain fertiliser from operating areas. Therefore, water from the lined pond is processed through a treatment plant to remove some of the phosphorus and nitrogen prior to off-site discharge to the Munster Hill Drain via a v-notch weir. The discharge is routinely sampled and tested for a wide range of parameters including nutrients, salts and metals.

Various processes and infrastructure at the site are used to manage fertiliser unloading, blending and dispatch activities to minimise contamination of stormwater resulting from spills, airborne dispersal and tracking out of fertiliser product from storage and dispatch facilities.

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 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
Dust	Earthworks and stockpiles of construction material	Air/windborne pathway	Industry standard construction dust suppression practices such as visual inspections and stockpile surface wetting will be used.
Noise	Construction works	Air/windborne pathway	Buffers of vegetation and screening walls exist between the proposed works area and site border on all sides. Construction is proposed to occur only during daytime hours.
Potentially contaminated stormwater/ groundwater discharge	Construction works Groundwater seepage and/or dewatering	Seepage and contamination of soils and groundwater	Proposed construction period (December to May) will be during the groundwater low period, reducing the need for dewatering. Dewatering pipe will be routed through existing groundwater drainage pathways

Emission	Sources	Potential pathways	Proposed controls
			The dewatering pipe will be routed through the unlined drain and will discharge into the underground pipe that leads to the unlined Pond. Any leakage that occurs due to a pipe integrity loss will be contained within the existing unlined drain system
Leachate	Acid Sulphate Soils (ASS) disturbance	Seepage and contamination of soils and groundwater	An Acid Sulphate Soils (ASS) investigation and management plan will be produced and submitted to the department prior to the commencement of construction. Any identified ASS within construction areas will be relocated and treated on a dedicated neutralized ASS treatment pad.
Potentially contaminated stormwater/ wastewater discharge	Wastewater loss of containment relating to weir changeover		Decommissioning of the temporary weir will only commence following the construction and commissioning of the new permanent weir. At no point during the changeover will the premise not have an operational weir and monitoring point.
	Operation of new permanent weir		The weir will operate under existing licence conditions.

3.1.2 Receptors

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

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

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

Human receptors	Distance from prescribed activity
Closest residential receptor	500m from eastern edge of the premises boundary
Environmental receptors	Distance from prescribed activity
Acid Sulphate Soils	Premises is within an area of moderate to high risk
Groundwater	Average summer groundwater levels is 6.7m AHD with 1-2 metre variability. Groundwater beneath the site is in an unconfined shallow superficial aquifer. Historical groundwater elevation for bores within the Site identify an overall west to south-west flow direction for shallow groundwater. The gradient is influenced to the east by Mount Melville, to the south by Mount Elphinstone, and to the west by the Munster Hill drain.

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 L8669/2012/2 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 construction and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Construction								
Construction of permanent weir and decommissioning of temporary weir	Dust	Air/windborne pathway causing impacts to health and amenity	Residential premises 500m east	Refer to Section 5.1	C = Slight L = Unlikely Low Risk	Y	N/A	The delegated officer considers the distance to sensitive receptors, on-site vegetation buffers and the short-term nature of construction activities sufficient to control risk. No regulatory controls for construction dust and noise are deemed necessary.
	Noise			Refer to Section 5.1	C = Slight L = Unlikely Low Risk	Y	N/A	
Disturbance of Acid Sulphate Soils	Metals and metalloids	Seepage through soil causing groundwater degradation.	Groundwater	Refer to Section 5.1	C = Moderate L = Possible Medium Risk	Y	Conditions 1 to 3	The delegated officer has determined to condition the applicant proposed controls within the amended licence to manage the risks associated with acid sulphate soils.
Discharge of potential contaminated groundwater/ stormwater	Sediment	Direct discharge to land Seepage through soil causing groundwater quality degradation.	Soil on premise Groundwater	Refer to Section 5.1	C = Minor L = Unlikely Medium Risk	Y	N/A	The delegated officer considers that the controls proposed by the licence holder, the short term nature of the construction activities, and the seasonal planning of the works are sufficient to manage the risks associated with groundwater seepage. The existing licence requires the monitoring and management of groundwater and surface water. No additional controls are considered necessary.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Loss of containment of stormwater in upgrade weir and reconfigured drains	Treated stormwater or wastewater potentially containing nutrients, trace elements and metals.	Discharge to land as a result of leaks or rupture causing soil degradation. Seepage through soil causing groundwater quality degradation.	Soil on premise Groundwater	Refer to Section 5.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 4 to 11	The delegated officer considers that the operation of the permanent weir and reconfigured drainages pathways does not materially alter the risk profile of the premise. Existing licence conditions are considered sufficient to maintain an acceptable level of risk. Licence holder commitments regarding the construction and operation of the replacement weir and sampling station are included as licence conditions.

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
City of Albany advised of proposal 14 October 2025	On 3 November 2025 the City confirmed with the department that a planning application for the development has been submitted and that the City had no objections to amendment proposed.	Noted. The delegated officer considers that it remains the responsibility of the Licence Holder to ensure that all appropriate approvals are obtained for the proposed works.
Licence Holder was provided with draft amendment on 6 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.

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
Cover page	Date of amendment updated.
Licence history	Section added relating to licence amendment.
1 and 2	Conditions added requiring the production and submission of an ASS management plan.
3	Condition requiring construction works be conducted in accordance with ASS management plan
4	Condition added setting design and construction requirements of upgraded weir.
5 and 6	Conditions added requiring the submission of compliance reporting relating to upgraded infrastructure.
Table 2	Item 1 and 6 removed and other items reworded to reflect licence holder requests outlined within Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions.
8 & Table 3	Condition wording and Table format updated to reflect changes to Table 2.
13 (now 10), 12 (now 11), 10 (now 12), New condition 13, 11 (now 14), 14 (now 15), 17 (now 16), 18 (now 17), 15 (now 18), 16 (now 19)	Condition updated to reflect licence holder requests outlined within Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions.
Table 2, Table 3, Table 4	Footnote added relating to the use of the upgraded weir.

and Table 5	
Definitions	Acid Sulphate Soil and Wastewater Treatment Plan added to definitions table.
Schedule 2, Figure 4 and Figure 5	Addition of figure 4: Construction stormwater management map and Figure 5: Project scope and proposed layout relating to the construction activities within condition 2.

6. References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. DER 2015, *Guideline: Identification and investigation of acid sulfate soils and acidic landscapes*, Perth, Western Australia.
3. DER 2015, *Guideline: Treatment and management of soil and water in acid sulfate soil landscapes*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, 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
4	Requests minor wording and specification changes.	Requests are accepted and updates made.
5	Requests wording changes and the submission period be extended from 60 days to 90 days due to the multiple stakeholders (CSBP, Main Roads Western Australia and the construction contractor) involved with the project.	The requested changes are accepted in part. The department recognises the challenges with sequencing the compliance reporting process and agrees to extend the timeframe for submission. The department also acknowledges the sequencing regarding construction and commissioning as has updated the specification of the condition to maintain the intent of the compliance reporting process. The submission of a single compliance report at the end of construction/ commissioning is considered appropriate.
7	Requests that note 1 below Table 2, Table 3, Table 4 and Table 5 be added as an Item to table 1. This change is requested to simplify the licence by keeping all construction conditions in the same place.	The department has accepted this request, however additional clarity regarding the operation of the weir to the footnote against Table 1.
	Requests the removal of Item 1 relating to stormwater as the capture and direction of surface water (including stormwater) is adequately covered by Items 3 and 4.	The department accepts that Items 3 and 4 sufficiently condition stormwater, the request has been integrated into the licence.
	Requests minor wording changes relating to items 3 and 4 to assist with readability alongside moving reporting requirements to condition 10.	Requests are accepted and updates made.
	Requests Item 5 be reworked to remove condition b as it is covered under condition 8.	The department has determined that the request reduces the clarity of the licence and despite condition b theoretically being managed under condition 8, the department maintains that the explicit requirement specified by part b is reasonable to retain. As such, the requested change has not been integrated into the amended licence.
	Requests item 6 be removed and the associated requirements instead by integrated into condition 8.	Requests are accepted and updates made.
8	Requests condition has its formatting reworked and updated to include requirements previously outlined within condition 7 item 6.	Certain wording changes such as the inclusion of treated wastewater and the change of 'water' to 'environment' have been made to ensure the intent of the conditions remains. All other changes have been implemented.
13 (now 10)	Requests condition be reworked and moved to instead become condition 10 including requirements previously outlined within condition 7 item 4. Within this rework it is requested that reporting requirements are moved from 14 days following non-compliance to instead notification before 5pm on the following usual working day and reporting requirements submitted within the	Requests are accepted and updates made.

Condition	Summary of Licence Holder's comment	Department's response
	AACR.	
12 (now 11)	Requests revision of subheadings to align with other CSBP licences alongside a rewording of the condition to reflect that NATA accredited sampling does not exist and thus cannot be applied. Instead the relevant Australian standard AS/NZS 5667.11 will be used for sampling.	Requests are accepted and updates made.
10 (now 12)	Requests a revision of the subheading to align with other CSBP licences alongside a rewording of the frequency section within table 5 to improve clarity.	Requests are accepted and updates made.
New condition (now 13)	Requests the addition of a new condition for consistency with other CSBP licences.	The proposed condition increases the monitoring requirements of the licence without affecting any existing licence controls. As such, the request is accepted and the condition inserted.
Condition 11 (now 14)	Requests a revision of subheading and a rework of condition wording to align with other CSBP licences.	Requests are accepted and updates made.
Condition 14 (now 15)	Requests the condition be moved.	Requests are accepted and updates made.
Condition 17 (now 16)	Requests the condition be moved and references updated.	Requests are accepted and updates made.
Condition 18 (now 17)	Requests the condition be moved and references updated.	Requests are accepted and updates made.
Condition 15 (now 18)	Requests an additional 30 days (30 August change to 30 September) be allowed for collation of all required evidence from suppliers and CSBP's quality assurance/control and review period.	Requests are accepted and updates made.
Condition 16 (now 19)	Requests the condition have wording amended to align with other CSBP licences.	Requests are accepted and updates made.
	Requests that table Item 1 and 2 are removed as they are covered under other licence requirements.	The department accepts the reporting requirements outlined to be sufficiently managed through other licence conditions and regulatory processes. As such, the requested changes have been integrated.
	Requests wording updates to item 3 to reflect changes made within condition 13 (now 10).	Requests are accepted and updates made.
	Requests items 4 and 5 reporting requirements be updated to: <ul style="list-style-type: none"> - 4: Results of monitoring of emissions in tabular and graphical format with an assessment of results against previous monitoring data. - 5: Results of monitoring of ambient groundwater quality in tabular and graphical format with an assessment of results against previous monitoring data. 	The department considers that the requirements requested can be completed in part, as the request omits the requirements relating to nutrient loading calculations and stipulations regarding timescale of data trend assessments. The requested changes have been partially integrated into the licence with portions of the old licence remaining in place.
	Requests Item 6 have its wording updated.	Request is accepted and updates made.

Condition	Summary of Licence Holder's comment	Department's response
	Requests item 7 be removed.	The department considers the removed condition to be effectively covered under condition 18. As such, requested changes is accepted and update made.
Definitions table	Requests the insertion of 'Quarterly' to be defined as; March, June, September and December.	Requests are accepted and updates made.