

North East Link Program – Central Package

# IEA Six-Monthly Environmental Compliance Report – May to October 2023

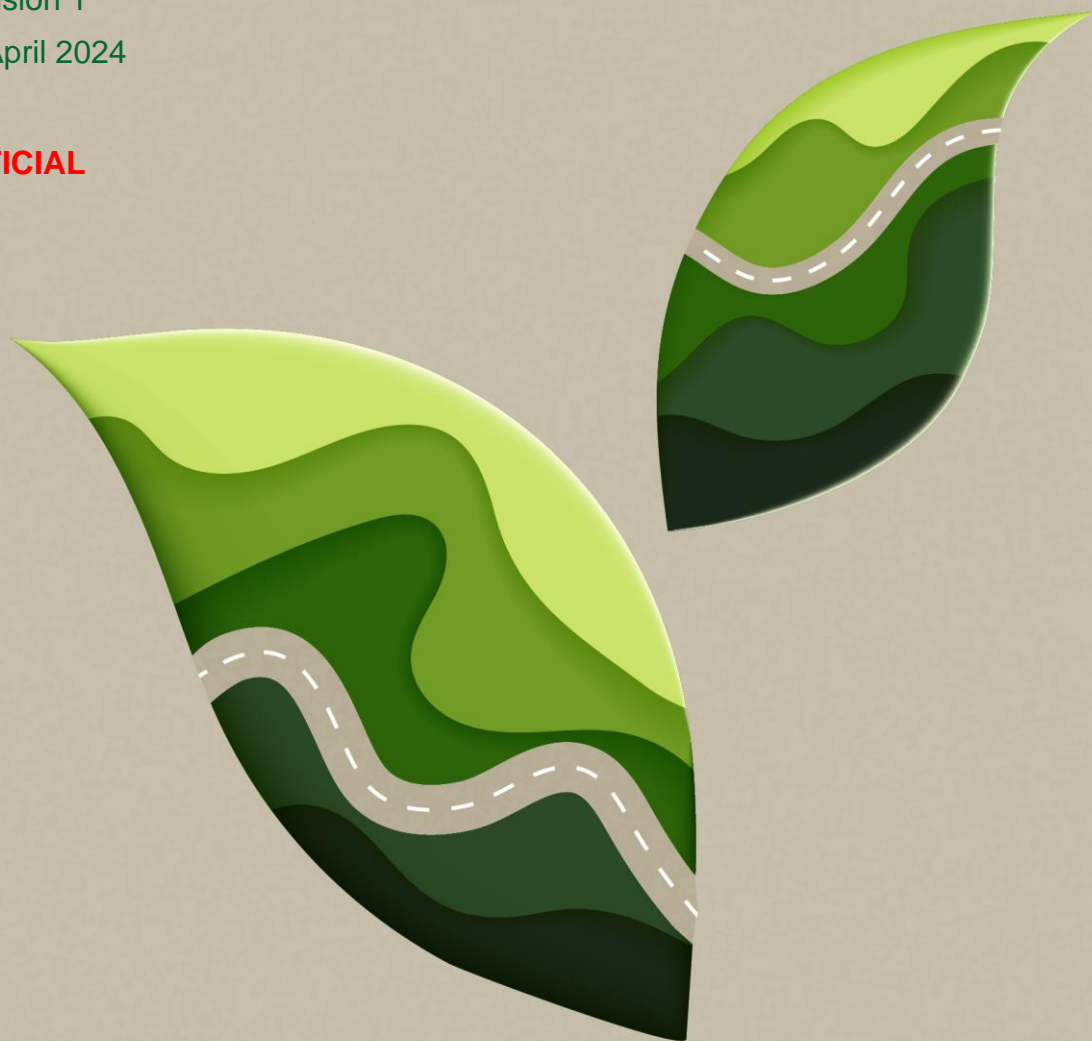
A Report to the Minister for Planning

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**OFFICIAL**





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## Abbreviations

<b>AAAJV</b>	APP, Arup and Aurecon Joint Venture
<b>Afl</b>	Area for Improvement
<b>ASS</b>	Acid Sulphate Soil
<b>BIZ</b>	Bulleen Industrial Zone
<b>CCP</b>	Construction Compound Plan
<b>CEMP</b>	Construction Environmental Management Plan
<b>D&amp;C</b>	Design and Construction
<b>EA</b>	Environmental Auditor
<b>EES</b>	Environment Effect Statement
<b>EMF</b>	Environmental Management Framework
<b>EPA</b>	Environment Protection Authority
<b>EPRs</b>	Environmental Performance Requirements
<b>ERSED</b>	Erosion and Sediment Control (Plan)
<b>FP</b>	Freeway Package
<b>IEA</b>	Independent Environmental Auditor
<b>IFU</b>	Issued for Use
<b>IR</b>	Independent Reviewer
<b>ITS</b>	Intelligent Traffic System
<b>MP</b>	Management Plan
<b>N</b>	Non-compliance
<b>NDD</b>	Non Destructive Drilling
<b>NELP</b>	North East Link Program
<b>O</b>	Observation
<b>OEMP</b>	Operations Environmental Management Plan
<b>PPP</b>	Public Private Partnership
<b>PSA</b>	Planning Scheme Amendment
<b>PSDR</b>	Project Scope and Delivery Requirements
<b>Spark D&amp;C</b>	Spark Design and Construction (Contractor)
<b>TBM</b>	Tunnel Boring Machine



<b>UDLP</b>	Urban Design and Landscape Plan
<b>UN SDGs</b>	United Nations Sustainable Development Goals
<b>WASS</b>	Waste Acid Sulphate Soil
<b>WEMP</b>	Worksite Environmental Management Plan



## Summary

The North East Link connects the Eastern Freeway at Bulleen Road to the M80 Ring Road at Greensborough Bypass via a new roadway. It also provides for upgrading the Eastern Freeway between Springvale Road and Hoddle Street, and the M80 Ring Road between Greensborough and Plenty Roads.

Spark North East Link Pty Ltd as the Trustee of Spark North East Link Trust (Project Co) has been contracted by the Minister for Transport Infrastructure to design and construct the Central Package of works comprising of 6.5 km twin three or four-lane tunnels, interchanges at Manningham and Lower Plenty Roads and upgrades to Greensborough and Bulleen Roads.

The Environmental Management Framework (EMF) for the Project requires that the Contractor develop and implement a range of environmental documentation including:

- Environmental Strategy
- Construction Environmental Management Plan (CEMP)
- Management Plans required by the Environmental Performance Requirements (EPRs)
- Worksite Environmental Management Plans (WEMPs)
- Construction Compound Plans (CCPs)

The EMF requires an Independent Environmental Auditor (IEA) be appointed to undertake reviews of the environmental documentation, and environmental audits of compliance with the documentation required by the Incorporated Document, the EMF, and the EPRs. The EMF also requires the IEA to prepare six-monthly summary reports. These reports must summarise audit activities during the reporting period, audit findings, the status of actions taken to address previous audit findings, and the contractors' compliance with the EMF and EPRs.

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from May to October 2023.

The State (through the North East Link Program) is responsible for the implementation of some EPRs. The report also summarises the outcomes of an audit of NELP for the EPRs for which it is wholly or partially responsible.

Seven audits were conducted during the audit period as shown in the following table:

Key Documents	May 23 (Monthly)	June 23 (Quarterly)	July 23 (Monthly)	Aug 23 (Monthly)	Sept 23 (6-Monthly)	Oct 23 (Monthly)	Oct 23 (NELP EPRs)
EPRs (as scheduled)		✓			✓		✓
Environmental Strategy					✓		
Construction Environmental Management Plan		✓ (key elements)			✓ (all applicable elements)		
Management Plans required by the EPRs		✓			✓		
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓	✓	





**Key Documents**

**May 23 (Monthly)**   **June 23 (Quarterly)**   **July 23 (Monthly)**   **Aug 23 (Monthly)**   **Sept 23 (6-Monthly)**   **Oct 23 (Monthly)**   **Oct 23 (NELP EPRs)**

Construction Compound Plans (CCPs)

✓  
(2 CCPs)

A total of seventy-five (75) audit findings were raised comprising thirteen (13) Non-compliances, thirty-four (34) Areas for Improvement, and twenty-eight (28) Observations. Ninety (90) findings were closed during the reporting period. Twenty-seven (27) findings remained open at the end of the reporting period.

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	3	13	11	5
<b>Afl</b>	27	34	47	15
<b>O</b>	11	28	32	7
<b>Total</b>	<b>41</b>	<b>75</b>	<b>90</b>	<b>27</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation

The overall outcomes of the audits conducted showed that both Spark’s documented environmental management arrangements and on ground environmental management had continued to improve. However, while most of the environmental management documentation had been revised to reflect actual environmental management processes, some environmental management system requirements and on-ground environmental controls were either not implemented as required by the works being undertaken, or not fully effective.

There were significantly more audit findings raised across all finding types compared to the last reporting period. Most findings (56 of the 75 raised) were against the requirements of the Sub Plans and the WEMPs. These documents largely define on ground environmental management requirements. The increase in the number of audit findings reflects accelerated construction activities during the reporting period, and the associated increased need for effective environmental controls.

The outcome of the audit of NELP demonstrated appropriate implementation of the EPRs for which it is wholly or partially responsible.

**Compliance with Plans Required in the Incorporated Document and the Environmental Management Framework**

The Incorporated Document defines the requirements for the Environmental Management Framework (EMF) for the Project. The EMF further requires that Spark prepare and implement Management Plans for specific environmental aspects. Compliance with these Plans is formally audited (see section below on compliance with the Management Plans).

The IEA has reviewed the required Plans separately from the audits.

**Compliance with Environmental Performance Requirements**

Each of the Plans required by the EMF includes responses to the related EPRs. Conformance with the Environmental Performance Requirements (EPRs) is being audited through a rolling 12-month EPR audit program and the EPRs in the scope of the audits conducted during the reporting period are included in this report.





Sixty-three (63) of the EPRs for which Spark is responsible were audited in the reporting period, some more than once. Four (4) findings were raised against the requirements of the EPRs; two Non-compliances, one Area for Improvement, and one Observation. The two Non-compliances related to the documented requirements for surface water management.

Twenty-seven (27) EPRs for which NELP may be wholly or partially responsible were audited. No findings were raised. A number of these EPRs were found to be not applicable or not relevant and may not be included in future audits of NELP.

#### Implementation of the Environmental Strategy

No new findings were raised against the requirements of the Environment Strategy during the reporting period. Two previous findings were closed.

#### Implementation of the Construction Environmental Management Plan

Thirteen (13) new findings were raised against the requirements of the CEMP; one Non-compliance, six (6) Areas for Improvement, and six (6) Observations. The findings were largely process related.

Nineteen (19) findings were closed and five (5) remained open at the end of the period.

#### Compliance with the Requirements of the Worksite Environmental Management Plans

Twenty-nine (29) findings were raised against the requirements of the WEMPs during the reporting period; three (3) Non-compliances, twelve (12) Areas for Improvement, and fourteen (14) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues, reflecting increased construction activities.

Thirty (30) findings were closed, and eight (8) remained open.

#### Compliance with the Requirements of the Management Plans

The Incorporated Document and the EMF require the development and implementation of specific Management Plans. Spark has developed all Plans required for the scope of work undertaken during the reporting period. These were reviewed by the IEA for compliance with the Project environmental requirements and verified as compliant.

Twenty-seven (27) new findings were raised during the reporting period; seven (7) Non-compliances, thirteen (13) Areas for Improvement, and seven (7) Observation. The Non-compliances were raised against Management Plan requirements for monitoring and reporting, with one Non-compliance relating to the use of unauthorised plant for work outside standard working hours. The other findings related to inadequate environmental controls at works areas, and to insufficient implementation of documented environmental management arrangements.

Thirty (30) findings were closed in the reporting period and ten (10) remained open.

#### Compliance with the Requirements of the Construction Compound Plans

Two (2) Areas for Improvement were raised against the requirements of the approved CCPs relating to hoarding installation, and to revision of the CCP maps.



# 1 Background to the audits

## 1.1 The North East Link Program

The North East Link connects the Eastern Freeway at Bulleen Road to the M80 Ring Road at Greensborough Bypass via a new roadway. It also provides for upgrading the Eastern Freeway between Springvale Road and Hoddle Street, and the M80 Ring Road between Greensborough and Plenty Roads.

The North East Link Program (NEL) includes:

- A new roadway between the M80 Ring Road at Greensborough and Eastern Freeway at Bulleen Road;
- New, twin three-lane tunnels from Wattle Drive, Watsonia to Bulleen Road, Bulleen;
- Five new interchanges at the Eastern Freeway, Manningham Road, Lower Plenty Road, Grimshaw Street and the M80 Ring Road;
- Upgrades to the M80 Ring Road between Plenty and Greensborough Roads;
- Major upgrades to the Eastern Freeway between Springvale and Bulleen Roads, with upgrades also to the Eastern Freeway between Bulleen Road and Hoddle Street;
- A dedicated busway between the Doncaster 'park and ride' and Hoddle Street;
- Intelligent transport systems to create a fully coordinated managed motorway environment; and
- Tolling systems and associated infrastructure.

The Central Package Scope of Works includes:

- Design, financing, construction and commissioning of 6.5 km twin three-lane tunnels, interchanges at Manningham and Lower Plenty Roads and upgrades to Greensborough and Bulleen Roads, as well as the Freeway Package (FP) Intelligent Transport System (ITS) Works;
- Development of the SP Interface Zones Preliminary Design;
- Undertaking the Services for the Central Package and the Extended Operational Activities for the Extended Operational Area; and
- Tolling Enabling Works.

Figure 1 shows an outline of the NEL works.

This report is applicable to the D&C works for the Central Package from the Northern Portal to the Southern Portal, and to some EPRs for which NELP is wholly or partially responsible.

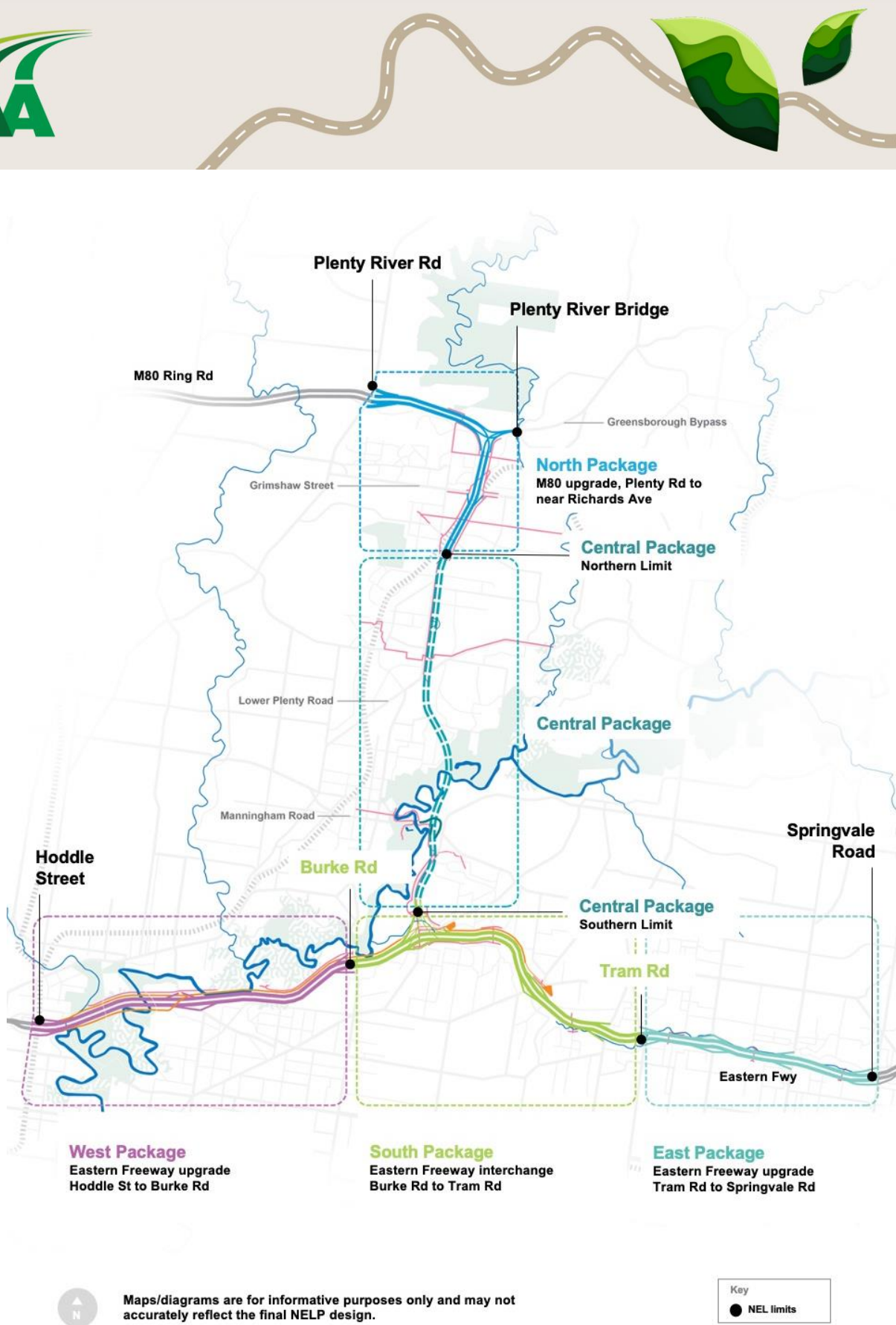


Figure 1: Schematic of the NEL works



## 1.2 NEL works

The **Central Package** scope of works is divided into work zones as follows:

### Project Wide

- Site establishment including vegetation clearing and installation of site huts and amenities
- Spoil management including spoil disposal
- Logistics – organising delivery of plant, equipment, and consumables required for construction
- Utilities and services relocation
- Precast concrete segment manufacturing
- Buildings
- Mechanical and electrical works
- Thomastown laydown yard

### Northern

- Watsonia portal and open trench works including piling, diaphragm walls, and bulk soil excavation
- Winsor Reserve spoil shed
- Vent tunnel
- Watsonia Roadworks; surface works including road works
- Lower Plenty cut and cover works including piling, diaphragm walls, and bulk soil excavation.

### Manningham

- Manningham cut and cover works including piling, diaphragm walls, and bulk soil excavation
- Manningham surface works including road works
- Bulleen cut and cover works including piling, diaphragm walls, and bulk soil excavation
- Bulleen surface works including road works

### Tunnels

- Tunnel Boring Machine (TBM) tunnels and associated support works such as spoil treatment and water treatment
- Mined tunnels

## 1.3 Purpose of this report

The EMF requires the IEA to prepare six-monthly summary reports for the Minister for Planning. These reports must summarise audit activities during the reporting period, audit findings, the status of actions taken to address previous audit findings, and the contractors' compliance with the EMF and EPRs.

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from May to October 2023, and an audit of the State organisation NELP of EPRs for which NELP is wholly or partially responsible.



## 2 Environmental Management Requirements

### 2.1 Environmental Management Framework

An Environmental Management Framework (EMF) was approved on 21 July 2021 by the Deputy Secretary – Planning for the Department of Land, Water, Environment and Planning, under delegation from the Minister for Planning. The EMF includes Environmental Performance Requirements (EPRs) for the North East Link Program. EPRs outline the environmental outcomes that must be achieved throughout the design, construction, and operation of the project, including strict requirements to make sure construction and environmental impacts are managed well and North East Link delivers long-lasting community benefit.

The EMF specifies the environmental management arrangements for Project delivery (see section 2.3 below).

Environmental management documentation is required to be prepared to address the requirements of the Incorporated Document, EMF and EPRs, and manage environmental risks and impacts through design, construction, and operation.

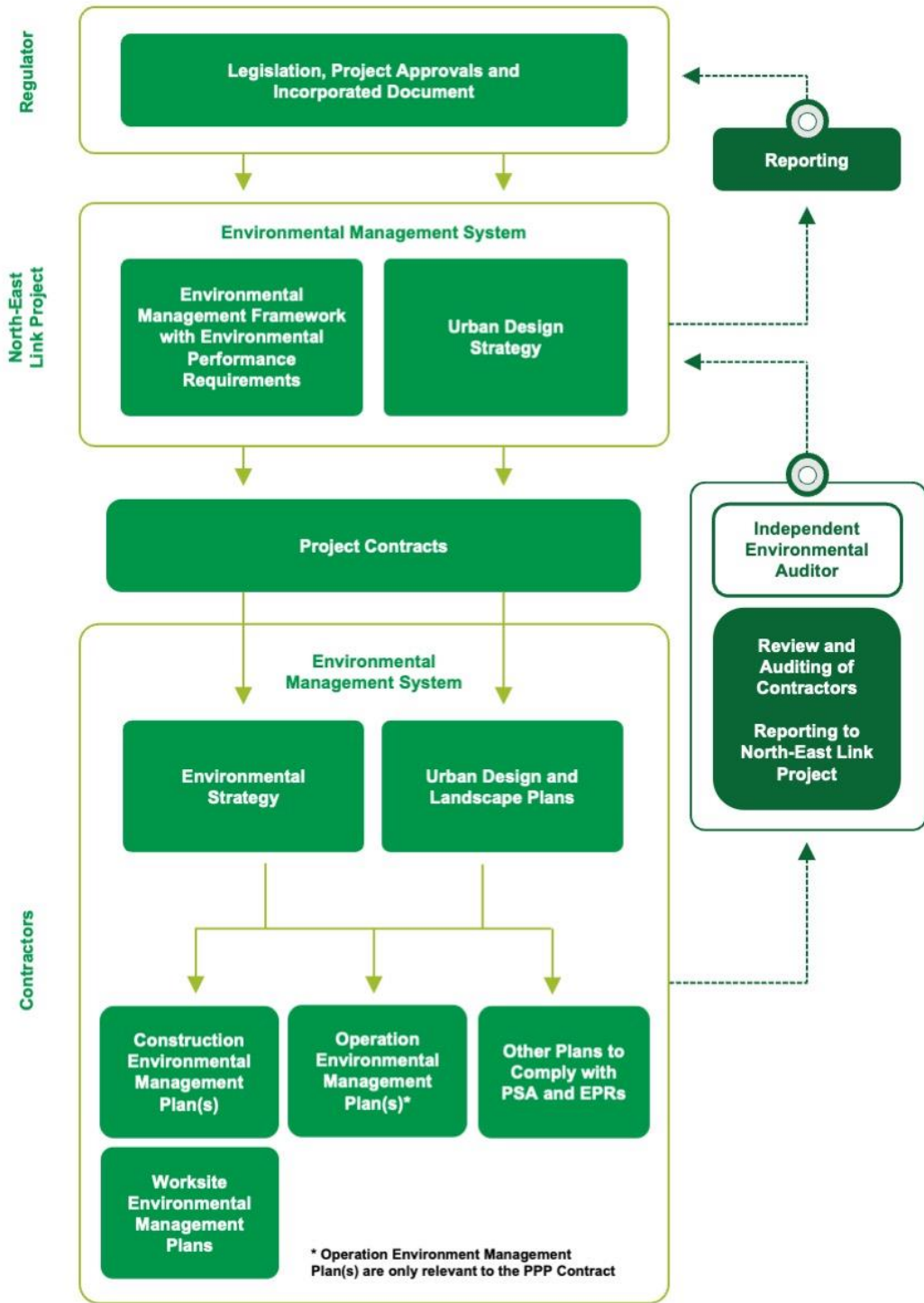
The EMF requires that the contractors develop and implement an Environmental Management System (EMS) certified to AS/NZS ISO 14001:2015 Environmental management systems — Requirements with guidance for use.

The EMF also requires that the Contractor develop and implement a range of environmental documentation including:

- Environmental Strategy
- Urban Design and Landscape Plans (UDLP)
- Construction Environmental Management Plan (CEMP)
- Construction Compound Plan (CCP)
- Worksite Environment Implementation Plans (renamed as Worksite Environmental Management Plans; WEMPs)
- Other plans required by the EPRs.

The EMF documentation is summarised below in Figure 2.





**Figure 2: Environmental Documentation**

(adapted from the EMF)



## 2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

The Incorporated Document is part of the Banyule, Boroondara, Manningham, Nillumbik, Whitehorse, Whittlesea, and Yarra Planning Schemes. The Incorporated Document allows the development of North East Link and defines conditions under which the development can take place.

The Incorporated Document requires the preparation of an Environmental Management Framework (EMF) to the satisfaction of the Minister and defines the relevant matters the EMF must consider (see next section). It also defines conditions which must be met for urban design and landscape, and native vegetation, and defines the requirements for Construction Compound Plans (CCPs).

## 2.3 Requirements of the EMF

The purpose of the EMF is to provide a framework to manage the environmental effects of the Project to meet statutory requirements, protect environmental values, and sustain stakeholder confidence.

The EMF specifies the environmental management arrangements for Project delivery including:

- Roles and responsibilities for environmental management to provide a transparent framework for governing the implementation of the EMF and EPRs
- A summary of key approvals that have/will be obtained and complied with
- Requirements for identification, assessment, and management of environmental risks
- No-go zones for the Project
- Environmental management documentation to prepare to address the requirements of the Incorporated Document, EMF and EPRs and manage environmental risks and impacts through design, construction, and operation
- The approach to evaluating compliance with the EMF and EPRs, including monitoring, auditing and reporting processes
- The EPRs that define the minimum environmental outcomes that must be achieved during Project delivery.

### 2.3.1 Environmental Performance Requirements

The EMF defines 110 Environmental Performance Requirements (EPRs) in 17 categories:

- Environmental management framework
- Aboriginal cultural heritage
- Air quality
- Arboriculture
- Business
- Contamination and soil
- Flora and fauna
- Ground movement
- Groundwater





- Historic heritage
- Land use planning
- Landscape and visual
- Noise and vibration (surface and tunnel)
- Social and community
- Surface water
- Sustainability and climate change (including greenhouse gas)
- Traffic and transport.

Spark’s activities and scope of works must comply with all relevant EPRs, as defined in the EMF and Table H17.1 of the PSDR (which replicates the EPRs and defines responsibilities for meeting them). Not all the requirements of the EPRs are applicable to every stage of the works, and not all the requirements are the responsibility of Spark. Of the 110 EPRs, Spark must comply with 100 of these in whole or part.

The requirements applicable to Spark’s D&C activities are considered in audit planning. All applicable EPRs are audited, taking a risk based approach, and all EPRs are audited at least once annually. Sixty-three (63) for which Spark is responsible were audited in the reporting period, some more than once.

Twenty-seven (27) EPRs for which NELP may be wholly or partially responsible were separately audited.

## 2.4 Spark environmental documentation

Spark has developed a range of environmental documentation to meet the requirements of the EMF and the Project PSDR. This includes:

- Environmental Strategy
- Construction Environmental Management Plan
- Management Plans required by the EPRs. These are:
  - Archaeology and Heritage Management Plan
  - Asbestos Management Plan
  - Business Disruption and Mitigation Plan
  - Communications and Community Engagement Plan
  - Construction Noise and Vibration Management Plan
  - Construction Noise and Vibration Management Plan – Simpson Barracks
  - Dust and Air Quality Management and Monitoring Plan
  - Ecology Management Plan
  - Flood Emergency Management Plan (Construction)
  - Green Infrastructure Plan
  - Ground Movement Management Plan
  - Groundwater Management Plan
  - GS Rating Implementing Sub-Plan
  - IS Rating Implementing Sub-Plan



- Spoil Management Plan
- Surface Water Management Plan
- Sustainability Management Plan
- Transport Management Plan
- Tree Removal Plan
- Waste Acid Sulfate Soils (WASS) Management Plan.

Spark D&C has also developed an Environmental Monitoring and Management Plan (not required by the EPRs)

- WEMPs. These are:
  - Worksite Environmental Management Plan – Site Investigations
  - Worksite Environmental Management Plan – Watsonia - Northern to Yallambie
  - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
  - Worksite Environmental Management Plan – Watsonia - Yallambie to Blamey
  - Worksite Environmental Management Plan – Lower Plenty - Blamey to Drysdale
  - Worksite Environmental Management Plan – Lower Plenty - Drysdale to Lower Plenty Road
  - Worksite Environmental Management Plan – Manningham
  - Worksite Environmental Management Plan – Bulleen
  - Worksite Environmental Management Plan – Bulleen – Southern Road Diversion
  - Worksite Environmental Management Plan – Bulleen Industrial Zone Demolition
  - Worksite Environmental Management Plan – Watsonia<sup>1</sup>.
- CCPs. These are:
  - Watsonia Construction Compound Plan – Vent Office Compound<sup>2</sup>
  - Watsonia Construction Compound Plan – TBM Compound
  - Watsonia Construction Compound Plan – Civil and Roads Compound
  - Lower Plenty Construction Compound Plan – Structures Compound<sup>2</sup>
  - Lower Plenty Construction Compound Plan – Mobilisation Compound
  - Manningham Construction Compound Plan – Mobilisation Compound
  - Manningham Construction Compound Plan – SEM Compound
  - Manningham Construction Compound Plan – Structural and M&E Compound
  - Bulleen Construction Compound Plan – Civil, Structural and Roads Compound
  - Bulleen Construction Compound Plan – Cut and Cover and SEM Compound
  - Winsor Reserve Construction Compound Plan – Spoil Handling Facility.

<sup>1</sup> In October 2023, WEMP – Watsonia replaced WEMP Watsonia Northern to Yallambie and WEMP Watsonia Yallambie to Blamey.

<sup>2</sup> The Watsonia Vent Office CCP and the Lower Plenty Structure CCP were audited during the reporting period.

The State (through NELP) has developed the following plans required by the EPRs:

- Business Relocation Strategy
- Employee Assistance Strategy

## 2.5 Role of the Independent Environmental Auditor

The EMF requires an IEA be appointed to undertake reviews of the environmental documentation, and environmental audits of compliance with the documentation required by the Incorporated Document, the EMF, and the EPRs. The overall objective for audits by the IEA is defined in the EMF: *“The Independent Environmental Auditor must conduct regular audits of contractors’ compliance with the EMF, EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, OEMP, any other plans required by the EPRs, conditions of Project approvals, and as required by NELP. Audits must occur prior to and during construction and for five years after opening of the Project, or as otherwise agreed with the Minister for Planning.”*

The approach to environmental compliance auditing is risk based and aligns to the framework defined in AS/NZS ISO 19011:2019 (Guidelines for Auditing Management Systems).



## 3 Audit activities

### 3.1 Environmental documentation verification

The IEA is required to review Spark's environmental documentation and verify conformance with the Project environmental requirements. This is undertaken for the initial versions of documents, and for each revision. The compliance audits are conducted against the version of the environmental documentation which has been verified by the IEA and accepted by NELP.

### 3.2 Audit program

An annual audit program is developed in consultation with NELP and Project Co. Audits are conducted based on the annual audit program to ensure:

- EPRs are audited at least annually (with more frequent audits for high-risk activities)
- The Environmental Strategy audited at least annually. This frequency is a change from the previous reporting period to reflect the low risk of non-compliance with the Environmental Strategy and the revision of subordinate environmental documentation.
- The environmental management system elements of the CEMP to be audited six-monthly
- The elements of the CEMP critical to effective environmental management to be audited quarterly
- The applicable CEMP sub-plans and Management Plans required by the EPRs to be audited quarterly
- Applicable WEMPs and CCPs audit frequency based on construction activities and environmental risks.

### 3.3 Audit conduct

The audit planning process for each environmental audit includes defining the objectives, scope, criteria, and additional information. The overall process for each audit is given in **Figure 3** below.

For audits of Spark D&C each audit includes:

- Review of relevant Spark environmental records
- Interviews with relevant Spark environment and site personnel
- Observation of construction activities.

For audits of the State (through NELP) the audit included:

- Review of relevant NELP environmental records
- Interviews with relevant NELP environment personnel



**Figure 3: Audit process**

### 3.4 Audit objectives, scope, and criteria

The audit objectives and scope for each audit as detailed in the audit program is confirmed through the following activities:

- Review of the Development Phase Program to identify the Project Activities occurring during the audit period.
- Identification of environmental risks relevant to the identified Project activities, and the related identified controls (documented in the EMP Sub Plans or other requirements). The relevant elements of the controls form part of the audit criteria.
- Review of the information gained from IEA site surveillance and results of previous audits to identify any areas in which the planned environmental arrangements may not be met.
- Review of the Environmental Strategy, the EPRs, the CEMP and any associated sub-plans, Management Plans required by the EPRs, WEMPs, and CCPs requirements.
- Review of the relevant environmental approvals. The environmental approvals relevant to the identified Project Activities will be reviewed to identify compliance requirements. The key compliance requirements will be included as part of the audit criteria.
- Review of Project Co records relating to internal audits; environmental monitoring; non-compliances, corrective and preventive actions; and incidents.
- Confirmation of audit criteria and development of checklists. Audit criteria are developed from the audit areas identified in the tasks above and included in checklists which are used to guide audit interviews, records reviews, and inspections.

The scope of audits conducted during the reporting period is provided in the following table, and the EPRs audited each quarter are given in Appendix 1 – EPRs audited in the reporting period.



**Table 1: Summary audit scope**

Key Documents	May 23 (Monthly)	June 23 (Quarterly)	July 23 (Monthly)	Aug 23 (Monthly)	Sept 23 (6- Monthly)	Oct 23 (Monthly)	Oct 23 (NELP EPRs)
EPRs (as scheduled)		✓			✓		✓
Environmental Strategy					✓		
Construction Environmental Management Plan		✓ (key elements)			✓ (all applicable elements)		
Management Plans required by the EPRs		✓			✓		
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓	✓	
Construction Compound Plans (CCPs)					✓ (2 CCPs)		

The criteria for each audit were derived from the Spark environmental documentation in scope as given above in section 2.4. The audit criteria were included in checklists to assist in developing objective audit evidence.

### 3.5 Construction activities during the reporting period

During the reporting period the following construction activities were being conducted:

**Table 2: Construction activities during the reporting period.**

Audit date	Construction activities
May 2023	<ul style="list-style-type: none"> <li>• Site establishment and civil works including installation of construction compounds</li> <li>• Clearing and grubbing including tree removal and pruning</li> <li>• Piling</li> <li>• D-Walling</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Trinity Lake back filling</li> <li>• Operation of Holcim batch plant at Bulleen Industrial Zone (BIZ)</li> <li>• Installation and maintenance of environmental controls</li> <li>• Utility relocation</li> <li>• Traffic management</li> <li>• Bulleen Industrial Zone stripping and demolition</li> <li>• Winsor Reserve site establishment</li> </ul>



Audit date	Construction activities
June 2023	<ul style="list-style-type: none"> <li>• Waste water treatment and dewatering</li> <li>• Geotechnical site investigations</li> <li>• Disposal of NDD waste.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Site establishment and civil works including installation of construction compounds</li> <li>• Clearing and grubbing including tree removal</li> <li>• Piling</li> <li>• D-Walling</li> <li>• Spoil shed installation</li> <li>• TBM assembly works area installation</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Trinity Lake back filling</li> <li>• Installation and maintenance of environmental controls</li> <li>• Traffic management</li> <li>• Bulleen Industrial Zone stripping and demolition</li> <li>• Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works</li> <li>• Drilling of geotechnical and groundwater investigation bores</li> <li>• Disposal of NDD waste.</li> </ul>
July 2023	<hr/> <ul style="list-style-type: none"> <li>• Site establishment and civil works including installation of construction compounds</li> <li>• Clearing and grubbing including tree removal</li> <li>• Piling</li> <li>• D-Walling</li> <li>• Spoil shed installation</li> <li>• TBM assembly works area installation</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Trinity Lake back filling</li> <li>• Installation and maintenance of environmental controls including water treatment plant at Trinity North and Trinity South</li> <li>• Traffic management</li> <li>• Bulleen Industrial Zone stripping and demolition</li> </ul>





Audit date	Construction activities
	<ul style="list-style-type: none"> <li>• Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works</li> <li>• Drilling of geotechnical and groundwater investigation bores</li> <li>• Disposal of NDD waste</li> <li>• Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard.</li> </ul>
August 2023	<ul style="list-style-type: none"> <li>• Site establishment and civil works including Bulleen Industrial Zone demolition and clearing</li> <li>• Installation of the Boral Batch Plant</li> <li>• Clearing and grubbing including tree removal</li> <li>• Piling, D-Walling and concrete pours</li> <li>• Spoil shed installation</li> <li>• TBM assembly works area installation</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Trinity Lake back filling</li> <li>• Traffic management</li> <li>• Winsor Reserve civil works and installation of the spoil shed</li> <li>• Drilling of geotechnical and groundwater investigation bores</li> <li>• Installation and maintenance of environmental controls including water treatment plant at Trinity North and Trinity South</li> <li>• Disposal of NDD waste</li> <li>• Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard.</li> </ul>
September 2023	<ul style="list-style-type: none"> <li>• Site establishment and civil works including Bulleen Industrial Zone demolition and clearing</li> <li>• Installation of the Boral Batch Plant</li> <li>• Clearing and grubbing including tree removal</li> <li>• Piling, D-Walling and concrete pours</li> <li>• Spoil shed installation</li> <li>• TBM assembly works area installation</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Traffic management</li> <li>• Winsor Reserve civil works and installation of the spoil shed</li> <li>• Drilling of geotechnical and groundwater investigation bores</li> </ul>



Audit date	Construction activities
	<ul style="list-style-type: none"> <li>• Installation and maintenance of environmental controls including water treatment plant at Trinity North and Trinity South</li> <li>• Disposal of NDD waste</li> <li>• Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard.</li> </ul>
October 2023	<ul style="list-style-type: none"> <li>• Site establishment and civil works including Bulleen Industrial Zone demolition and clearing</li> <li>• Installation of the Boral Batch Plant</li> <li>• Clearing and grubbing including tree removal</li> <li>• Piling, D-Walling, and concrete pours</li> <li>• Spoil shed installation</li> <li>• TBM assembly works</li> <li>• Excavation and spoil removal including at Watsonia Box, Vent tunnel and Smoke Shaft</li> <li>• Traffic management</li> <li>• Winsor Reserve civil works and installation of the spoil shed</li> <li>• Drilling of geotechnical and groundwater investigation bores</li> <li>• Installation and maintenance of environmental controls including water treatment plant at Trinity North and Trinity South</li> <li>• Disposal of NDD waste</li> <li>• Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard.</li> </ul>



## 4 Audit outcomes

### 4.1 Audit findings classifications

The findings of the audits have been classified into categories as follows:

Compliance	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in full compliance with the requirements of the audit criterion.
Non-compliance	<p>The absence of, or the failure to implement and maintain, one or more requirements of the relevant environmental documentation, or a situation, which would, on the basis of available objective evidence raise significant doubt as to the effectiveness of environmental management.</p> <p>Note: A non-compliance may be an individual non-compliance or a number of minor but related audit non-compliances, which when considered in total are judged to constitute a non-compliance</p>
Area for improvement	A deficiency in the implementation of the relevant element of the documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
Observation	An audit finding which may relate to an incidental or isolated system discrepancy, which does not compromise the effectiveness of environmental management, or constitute an actual or potential environmental risk.
Undetermined	There was insufficient evidence or information accessible during the audit to objectively classify the nature of compliance.
Not Applicable	The auditable element falls outside the scope of the audit, e.g., work relevant to the element being audited has not yet commenced.

#### 4.1.1 Significance of audit findings

The nature of audit findings may vary depending on the context in which they have been raised. For example, some findings may be administrative in nature compared with those that pose an immediate and/or significant risk to the environment. Administrative findings usually related to documented environmental management arrangements. An example of an administrative finding might include the requirement for Spark to use a particular system to record incidents, where this is defined in the CEMP. However, if Spark has upgraded this system and replaced it with an alternative, this means the CEMP is now out of date and does not reflect current practices. In this case Spark may not be conforming with the original CEMP (which is captured as a finding in an audit), but it does not necessarily mean that incidents are not being reported. This requirement is likely to be revised in the next version of the CEMP. Administrative findings accordingly do not always pose a significant risk to the environment.

Alternatively, if Spark was found to have caused an event resulting in an impact to a sensitive environment or to residents, this would be viewed as a finding of greater significance.

Similarly, some findings are localised (rather than systemic) in nature. For example, a finding raised against a WEMP may reflect an immediate issue at a particular worksite, which can be addressed and closed out by taking on-site action.



## 4.2 Overall audit findings

All the audit findings raised during the reporting period, and actions taken to address audit findings open from previous audits, are given in Appendix 2 – Audit findings and summary of actions taken.

The audit findings raised during the reporting period are summarised below.

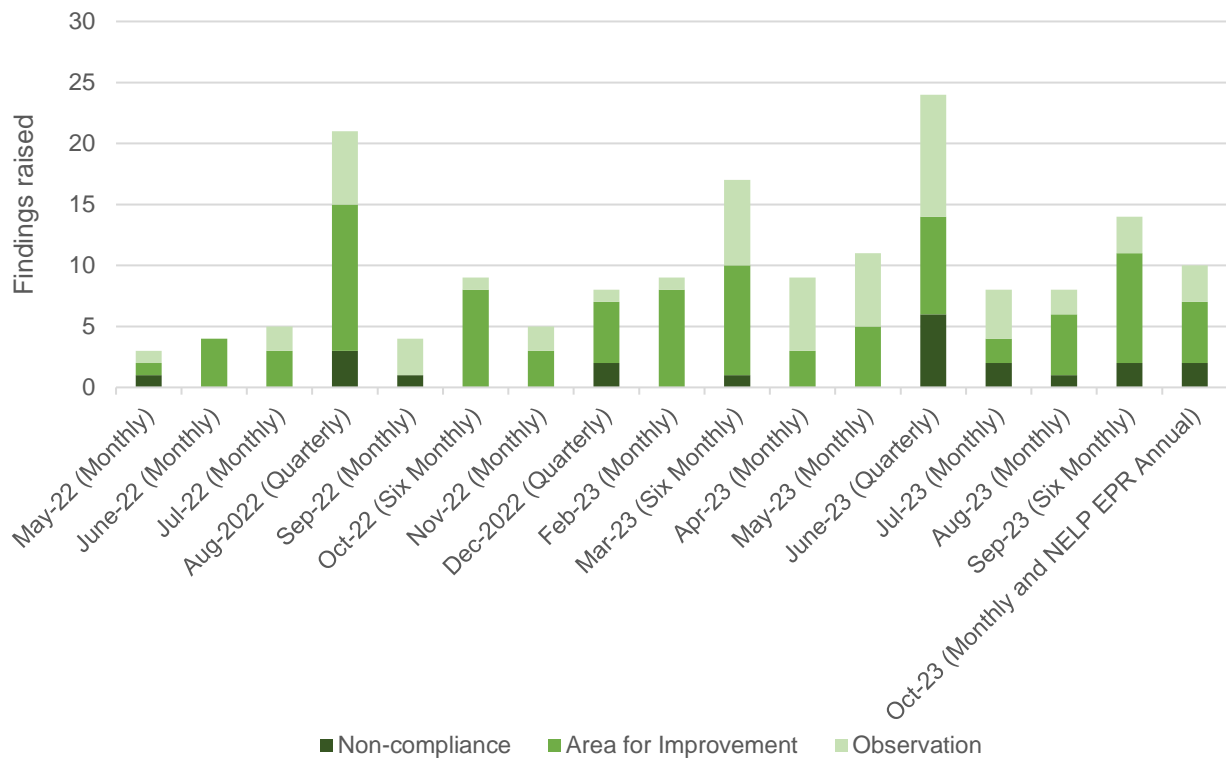
**Table 3: Total audit findings May - October 2023**

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	3	13	11	5
<b>Afi</b>	27	34	47	15
<b>O</b>	11	28	32	7
<b>Total</b>	<b>41</b>	<b>75</b>	<b>90</b>	<b>27</b>

N – Non-compliance; Afi – Area for Improvement; O – Observation

A total of seventy-five (75) audit findings were raised comprising thirteen (13) Non-compliances, thirty-four (34) Areas for Improvement, and twenty-eight (28) Observations.

Most of the audit findings were raised in the June 2023 quarterly audit, which assessed compliance against the requirements of most of Spark’s environmental documentation, and the requirements of selected EPRs (see Figure 4).



**Figure 4: Audit findings by type and audit date (Project commencement to October 2023)**



There were significantly more audit findings raised across all finding types compared to the last reporting period. Most findings (56 of the 75 raised) were against the requirements of the Sub Plans and the WEMPs. These documents largely define on ground environmental management requirements. The increase in the number of audit findings reflects accelerated construction activities during the reporting period, and the associated increased need for effective environmental controls.

Spark D&C established corrective actions to address the audit findings. Ninety (90) findings were closed during the reporting period. Twenty-seven (27) findings remained open at the end of the reporting period. (See Figure 5).

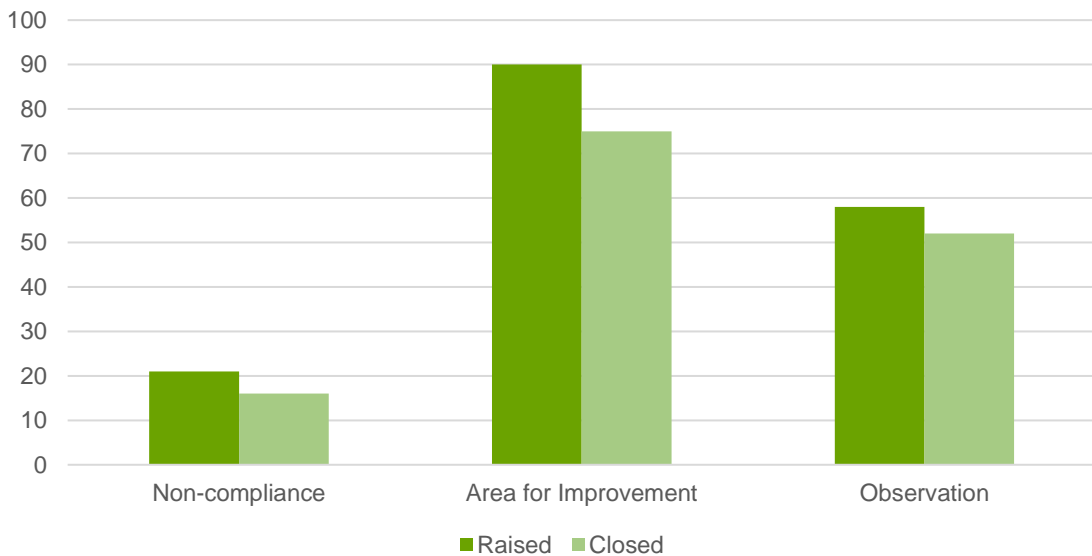


Figure 5: Cumulative audit findings raised and closed - Project commencement to October 2023

### 4.3 Compliance with the Incorporated Document

Compliance with the EMF is audited through audits of the EPRs, and the Plans required by the EPRs (see below). The EPRs related to urban design and landscape are included in these audits, as are Spark’s Landscape Plans. Native vegetation management is integrated with Spark’s overall ecology management including the tree management plans and the documentation is reviewed, verified, and audited as for all management plans.

Implementation of the requirements of approved CCPs is separately audited (see below).

### 4.4 Compliance with Environmental Performance Requirements

#### Spark Audits

All the sixty-three (63) planned and applicable EPRs as agreed with NELP and Project Co were audited for the period. This represents over half of the applicable EPRs. At least one EPR from all of the 17 EPR categories was included in the six-month period, and CL5 was assessed twice.

Not all the requirements of the EPRs are applicable to every stage of the works, and not all the requirements are the responsibility of Spark. The requirements applicable to Spark’s D&C activities are considered in audit planning.



Four (4) findings were raised against the requirements of the EPRs; two Non-compliances, one Area for Improvement, and one Observation. The two Non-compliances related to the documented requirements for surface water management. The remaining EPR-related findings were raised against the management and storage of chemicals and fuels (see Table 4).

In general, the findings are related to documented environmental management arrangements and do not represent a material risk to the environment.

Findings against EPRs are raised when the EPR is formally audited. While some findings raised against other audit criteria (such as Management Plans) may relate in part to an environmental issue covered by an EPR, the finding is not repeated for the EPR.

### NELP audit

The responsibility for the implementation of some EPRs is split between the State (through NELP) and Spark D&C. Twenty-seven (27) EPRs for which NELP may be wholly or partially responsible were audited. No findings were raised. A number of these EPRs were found to be not applicable or not relevant and may not be included in future audits of NELP.

**Table 4: Summary of EPR audit findings May - October 2023**

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	1	2	3	0
<b>Afl</b>	3	1	3	1
<b>O</b>	2	1	2	1
<b>Total</b>	6	4	8	2

N – Non-compliance; Afl – Area for Improvement; O – Observation

Figure 6 shows the distribution of EPRs in each of the categories noting which were audited, and the status of compliance for the reporting period. Only EPRs relevant to the design and construction underway during the reporting period were included in the audit schedule for the period. Further, not all EPRs have equally detailed requirements, and there are different numbers of EPRs in each EPR category. The number of EPRs audited does not directly reflect the relative weight of environmental management requirements.

As each EPR category includes several EPRs, some of these were not included in the audits in the reporting period. All environmental issues are audited through the audits of Management Plans.

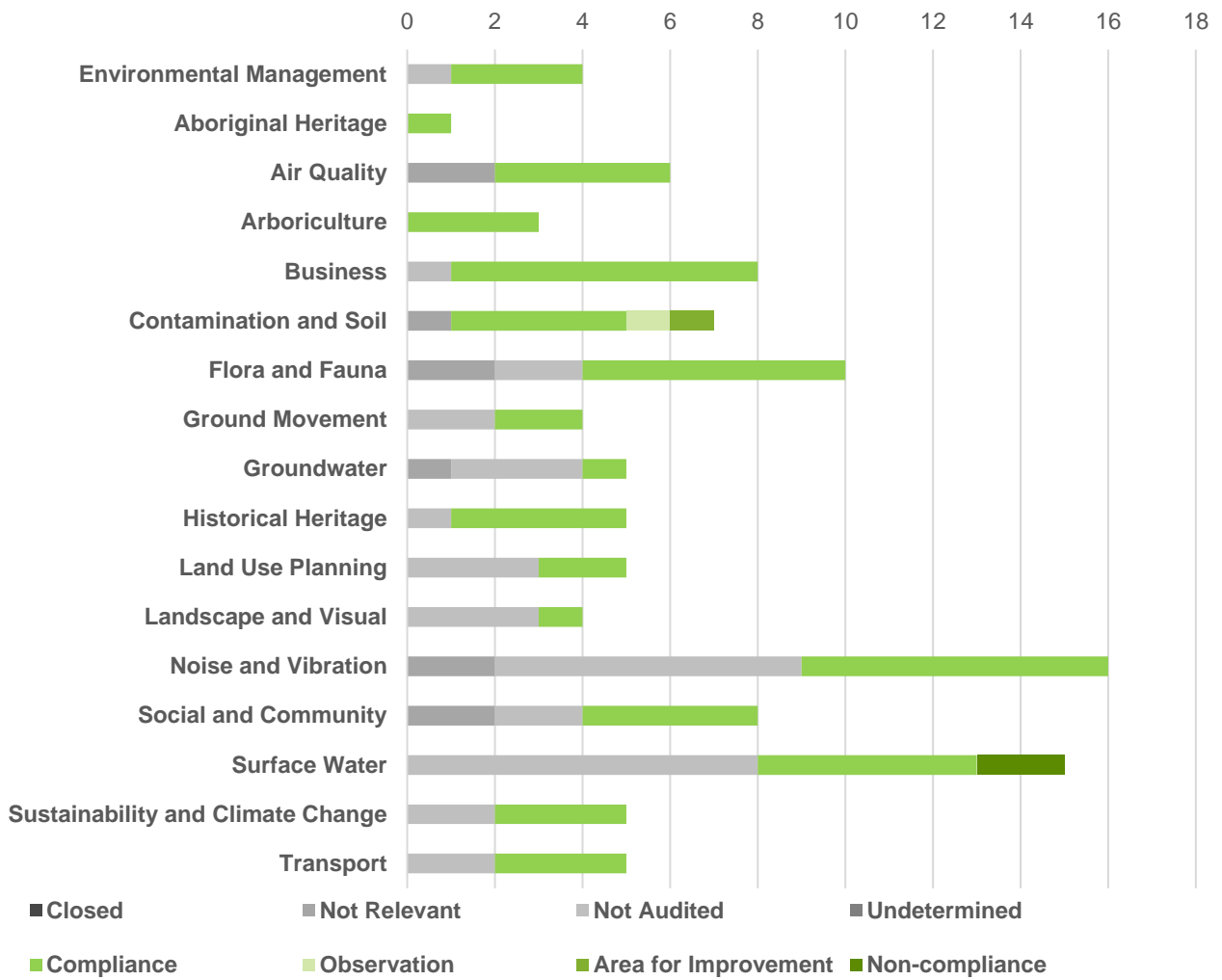


Figure 6: EPR audit findings by EPR category May - October 2023

## 4.5 Implementation of the Environmental Strategy

The implementation of the Environmental Strategy was audited in September 2023. The two previously raised findings were closed, and no new findings were raised.

Table 5: Environment Strategy audit findings May - October 2023

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	0	0	0	0
<b>Afl</b>	2	0	2	0
<b>O</b>	0	0	0	0
<b>Total</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation





## 4.6 Implementation of the Construction Environmental Management Plan

An audit of the selected key elements of the CEMP was conducted in June 2023, and an audit of all applicable elements was conducted in September 2023. Thirteen (13) new audit findings were raised comprising one (1) No-compliance, six (6) Areas for Improvement, and six (6) Observations.

In general, the findings were process related and are related to documented environmental management arrangements and do not represent a material risk to the environment. A summary of the audit findings is given below.

**Table 6: CEMP audit findings May - October 2023**

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	2	1	2	1
<b>Afl</b>	7	6	11	2
<b>O</b>	2	6	6	2
<b>Total</b>	<b>11</b>	<b>13</b>	<b>19</b>	<b>5</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation

Nineteen (19) previous audit findings were closed; two (2) Non-compliance, eleven (11) Areas for Improvement, and six (6) Observations. Five (5) findings remained open.

## 4.7 Implementation of the Worksite Environmental Management Plans

The WEMPs applicable to the works underway were audited each month during the reporting period. Twenty-nine (29) findings were raised against the requirements of the WEMPs during the reporting period; three (3) Non-compliances, twelve (12) Areas for Improvement, and fourteen (14) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting increased construction activities, and to process implementation issues.

Spark made good progress in addressing the findings, with thirty (30) previous findings closed and eight (8) remaining open. See Table 7. Ineffective environmental controls present a localised risk to the environment.

**Table 7: WEMP audit findings May - October 2023**

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	0	3	2	1
<b>Afl</b>	3	12	11	4
<b>O</b>	6	14	17	3
<b>Total</b>	<b>9</b>	<b>29</b>	<b>30</b>	<b>8</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation



## 4.8 Implementation of Management Plans

Spark has developed Management Plans to address the environmental management requirements for specific environmental aspects, and to meet the requirements of the EPRs. The applicable elements of the Management Plans were audited in June and September 2023. Twenty-seven (27) new findings were raised during the reporting period; seven (7) Non-compliances, thirteen (13) Areas for Improvement, and seven (7) Observation.

The Non-compliances were raised against several Management Plans, including the EMMP, SWMP, GWMP, SpMP, and the CNVMP. Two of the Non-compliances related to inadequate on site environmental controls (for noise and water discharges). The remaining Non-compliances related to reporting and process requirements. The other findings related to Project wide inadequate environmental controls, and to insufficient implementation of documented environmental management arrangements.

Ineffective environmental controls present a risk of damage to the environment.

Table 8: Management Plans findings May - October 2023

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	0	7	4	3
<b>Afl</b>	12	13	20	6
<b>O</b>	1	7	7	1
<b>Total</b>	<b>13</b>	<b>27</b>	<b>31</b>	<b>10</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation

## 4.9 Implementation of Construction Compound Plans

Two of the Construction Compound Plans approved by the Minister were audited in the reporting period. One Observation was raised relating to site hoarding not being installed as defined in the CCP, and the other Observation related to construction undertaken slightly outside the permitted CCP area.

In general, the findings are related to documented environmental management arrangements and do not represent a material risk to the environment.

Table 9: CCPs findings May - October 2023

Finding Type	Open at start of May 2023 - Oct 2023 period	Raised during May 2023 - Oct 2023 period	Closed during May 2023 - Oct 2023 period	Open at end of May 2023 - Oct 2023 period
<b>N</b>	0	0	0	0
<b>Afl</b>	0	2	0	2
<b>O</b>	0	0	0	0
<b>Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>

N – Non-compliance; Afl – Area for Improvement; O – Observation



## 5 Audit conclusions

### 5.1 Compliance with Plans required in the Incorporated Document

The Incorporated Document defines the requirements for the Environmental Management Framework (EMF) for the Project. It further requires that Spark prepare and implement Management Plans for specific environmental aspects.

The Independent Environmental Auditor (IEA) has reviewed the required Plans separately from the audits. Each of the required Plans includes responses to the EPRs. Conformance with the Environmental Performance Requirements (EPRs) is being audited through a rolling 12-month EPR audit program and the EPRs in the scope of the audits conducted during the reporting period are included in this report.

### 5.2 Compliance with Environmental Performance Requirements

Sixty-three (63) of the EPRs for which Spark is responsible were audited in the reporting period, some more than once. The findings against the EPRs do not represent a material risk to the environment.

The responsibility for the implementation of some EPRs is split between the State (through NELP) and Spark D&C. Twenty-seven EPRs for which NELP may be wholly or partially responsible were audited. No findings were raised. A number of these EPRs were found to be not applicable or not relevant and may not be included in future audits of NELP.

### 5.3 Implementation of the Environmental Strategy

No new findings were raised against the requirements of the Environmental Strategy during the reporting period. Two previous findings were closed.

The Environmental Strategy provides an adequate framework for environmental management.

### 5.4 Implementation of the Construction Environmental Management Plan

The CEMP is the main overarching document which outlines the processes and systems to manage Spark D&C's environmental aspects. The CEMP has been documented to meet the requirements from ISO14001. CEMP-related audit findings show that Spark's environmental management system is progressing and that the documented environmental management arrangements are progressively reflecting actual environmental management practices.

### 5.5 Compliance with the requirements of the Worksite Environmental Management Plans

The WEMPs have been established to meet the requirements on the EMF and the PSDR. However, they are complex documents for managing site environmental management. A range of audit findings have been



raised relevant to on-ground environmental management and implementation of environmental controls. The issues highlighted by these findings present a potential risk to the local environment.

## **5.6 Compliance with the requirements of the Management Plans**

The EMF requires the development and implementation of specific Management Plans. Spark has developed all the plans required for the scope of work undertaken during the reporting period. The audits found that there were some issues with on-site environmental management, and process issues including monitoring and implementation of site-based controls. The findings against the Management Plans reflect package wide environmental issues, with the potential for environmental harm.

## **5.7 Compliance with the requirements of the Construction Compound Plans**

The development of Construction Compound Plans (CCPs) to the satisfaction of the Minister for Planning is required by the Incorporated Document. The new audit findings raised against the requirements of the approved CCPs are not considered material.



## Appendix 1 – EPRs audited in the reporting period

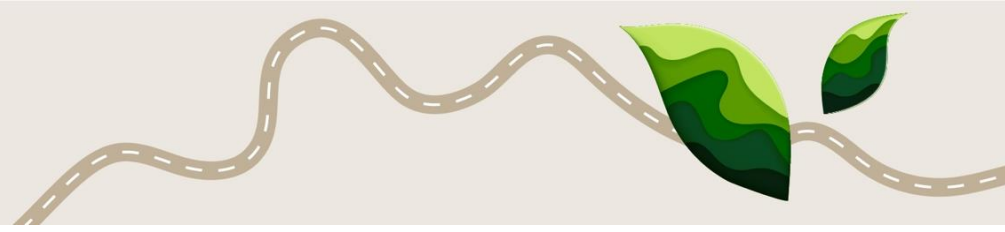
Audit date	EPRs audited	
June 2023	Environmental Management (EMF)	EMF1, EMF2, EMF4
	Aboriginal Heritage (AH)	AH1
	Air quality (AQ)	(AQ) AQ1
	Arboriculture (AR)	AR1, AR2
	Business (B)	B3, B7, B8
	Contamination and soil (CL)	CL4, CL5
	Flora and fauna (FF)	FF1, FF2, FF3, FF5, FF6, FF9
	Historical Heritage (HH)	HH2, HH5
	Noise and Vibration (NV)	NV2, NV3, NV4, NV15
	Social and Community	SC3, SC4
	Surface Water (SW)	SW1, SW2, SW5
	Sustainability and Climate Change (SCC)	SCC1, SCC4
	Traffic and Transport (TT)	T2, T3
September 2023	Air quality (AQ)	AQ2, AQ3, AQ6
	Arboriculture (AR)	AR3
	Business (B)	B1, B2, B5, B6
	Contamination and soil (CL)	CL1, CL2, CL3
	Ground Movement (GM)	GM1, GM3
	Groundwater (GW)	GW1
	Historical Heritage (HH)	HH1, HH3
	Land Use Planning (LP)	LP1, LP4
	Landscape and Visual (LV)	LV3
	Noise and Vibration (NV)	NV5, NV8, NV9
	Social and Community (SC)	SC5, SC6
	Surface Water (SW)	SW3, SW7, SW13
	Sustainability and Climate Change (SCC)	SCC2
Traffic and Transport (TT)	T5	
October 2023 (NELP Audit)	Environmental Management (EM)	EMF2, EMF4
	Aboriginal Heritage (AH)	AH1
	Arboriculture (AR)	AR1^
	Business (B)	B1, B2*, B3*, B4, B8
	Contamination and soil (CL)	CL5^, CL6^
	Flora and fauna (FF)	FF1, FF2



<b>Audit date</b>	<b>EPRs audited</b>
	Ground Movement (GM) GM1
	Groundwater (GW) GW5^
	Landscape and Visual (LV) LV1
	Noise and Vibration (NV) NV1^, NV14^
	Social and Community (SC) SC2, SC3, SC4
	Sustainability and Climate Change (SCC) SCC1, SCC2*
	Traffic and Transport (TT) T3, T4^ T5

\* EPRs B2, B3 an SCC2 will cover activities across all Packages. All other EPRs in scope notes above will be limited to Central Package activities.

^ EPRs GW5, AR1, CL5, CL6, NV1, NV14 & T4 will be audited but are not expected to be currently applicable.



## Appendix 2 – Audit findings and summary of actions taken

### *Audit Findings Raised During the Reporting Period*

**Table 10: Summary of audit findings against the Environmental Strategy**

No new findings were raised against the Environment Strategy during the reporting period.



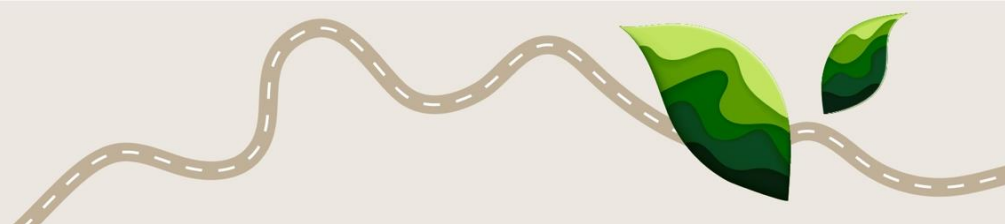


Table 11: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-23	IEA-0523-01	O	<b>EPR CL5:</b> Hazardous chemicals were observed either incorrectly labelled or stored outside the designated storage areas at sites in the north and south.	Spark adequately addressed chemicals and fuel storage. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jun-23
Jun-23	IEA-0623-01	N	<b>EPR SW1:</b> Conformance with the Victorian Stormwater Committee’s Best Practice Environmental Management Guidelines for Urban Stormwater could not be demonstrated.	Spark has revised the Stormwater Management Plan to demonstrate compliance with the Guidelines. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-23
Jun-23	IEA-0623-21	N	<b>EPR SW4:</b> A surface water quality monitoring program has not been developed in consultation with the EPA. Accordingly, baseline conditions to enable assessment of construction impacts on receiving waters have not been established.	Spark initiated consultation with the EPA on the monitoring program and is establishing baseline conditions. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Sep-23	IEA-0923-01	Afl	<b>EPR CL5:</b> Processes for the management of chemicals and other hazardous substances including approval for use, risk assessments and inclusion on inventories, not always implemented as described.	Spark has engaged specialist advice to assist with the management of chemicals on site. This was not fully implemented in the reporting period. This finding related to on site environmental controls and represented a low risk to the environment.	Open	

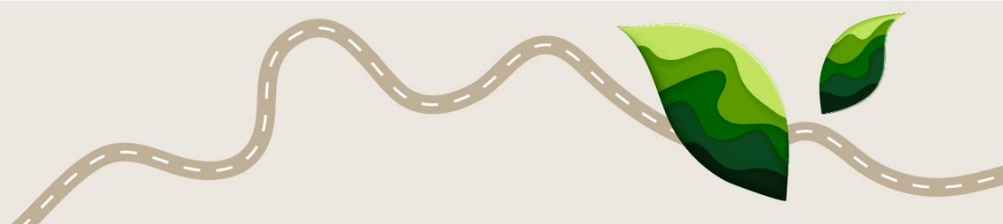
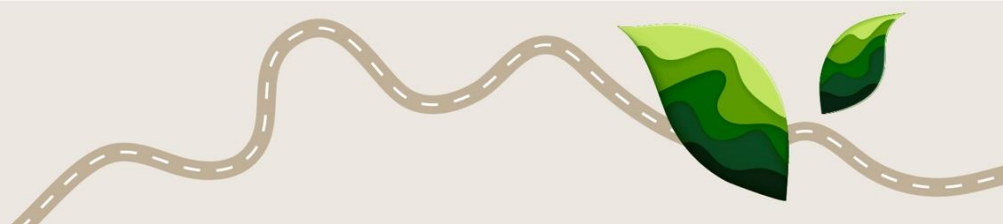
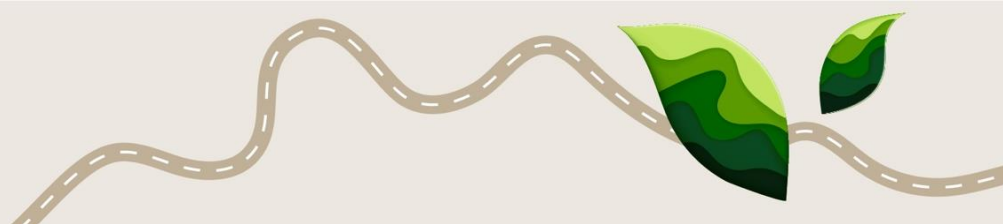


Table 12: Summary of findings against the CEMP

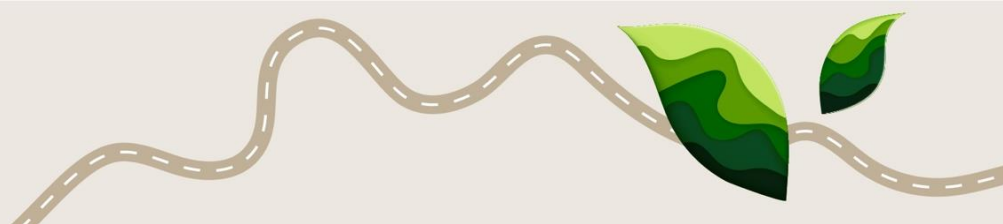
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
May-23	IEA-0523-02	Afl	<b>CEMP 9.1 Monitoring:</b> The Trinity North, Bulleen Cut & Cover and Bulleen SRD SiteHive monitors were offline for extended periods during the audit period. The response, investigation, and reinstatement of SiteHives was delayed and as a result monitoring could not be demonstrated throughout the audit period.	The monitors have been replaced or repaired. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23
Jun-23	IEA-0623-02	Afl	<b>CEMP 4.1 Requirements Compliance:</b> Records in the Obligations Register have not been updated to include the latest permits and approval requirements. For example, the register did not record the relevant requirements from the latest TRPPs, the Catchment and Land Protection Act 1994 or heritage due diligence assessments.	Spark has updated the Obligations register to include the required obligations. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jul-23
Jun-23	IEA-0623-03	O	<b>CEMP 4.1 Requirements Compliance:</b> Spark no longer use SAI Global to track relevant standards.	Spark has revisited CEMP to reflect the actual process for tracking relevant Standards. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Sep-23
Jun-23	IEA-0623-04	Afl	<b>CEMP 4.3 Environmental Performance Requirements:</b> Use of the Obligations Register to carry out monthly EPR compliance checks does not include all relevant	Spark has revised the Obligations register to identify the information required to demonstrate compliance.	Closed	Jul-23



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			information to demonstrate means for compliance.	This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.		
Jun-23	IEA-0623-05	N	<b>CEMP 5.5 Project Plans</b> Use of the laydown site at Thomastown has commenced without established environmental management.	Spark is developing the relevant environmental management documentation. This was not fully implemented in the reporting period. This finding related to on site environmental controls and represented a low risk to the environment.	Open	
Jun-23	IEA-0623-06	O	<b>CEMP 9.2.2 Digital tools.</b> Digital augmented reality tools have not been implemented.	Spark is revising the CEMP to address this finding. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-23	IEA-0623-07	O	<b>CEMP 9.3.1.3 Audit findings and reporting.</b> Copies of internal audit reports, including corrective actions, have not been delivered to NELP and the IEA within 5 business days of completion.	Spark has ensured that the internal audit reports are distributed as required. This finding related to documented environmental management arrangements and did not represent a material risk to the environment.	Closed	Jul-23
Jun-23	IEA-0623-08	O	<b>CEMP 9.5.1 Corrective and Preventive Actions.</b> Verification of the effectiveness of corrective actions is not formally recorded.	Spark has developed a process including verification of the effectiveness of corrective actions in internal audits, and for actions arising from site inspections.	Closed	Aug-23



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Aug-23	IEA-0823-03	Afl	<b>CEMP 5.5.3 Site Environmental Plans:</b> Updated SEPs had not been communicated to the workforce.	Spark undertook tool box talks for the work force to communicate the revised SEPs. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Sep-23	IEA-0923-02	O	<b>CEMP 4 Obligations:</b> The Obligations register did not have the current status of open and closed bore licences issued by Southern Rural Water.	Spark has revised the Obligations Register include the status of bore licences. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-23
Sep-23	IEA-0923-03	O	<b>CEMP 6.5 Environment in design:</b> Risks to prioritise the review of design packs for EPR compliance had not been assigned to all design packs listed in the EPR tracker as per the CEMP requirement.	Spark is developing risk ratings for current Design Packs. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Sep-23	IEA-0923-04	Afl	<b>CEMP 11.3 Management review:</b> The management review conducted in September 2023 has not yet been shared with all relevant senior management or documented the review outcomes including the continuing suitability, adequacy and effectiveness of the environmental management processes, as per	Spark is developing a process to ensure that senior management is appropriately included in management reviews. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			the requirements of the CEMP and ISO 14001 element 9.3.			
Oct-23	IEA-1023-07	Afl	<b>CEMP 5.5.3 SEP:</b> Not all items were identified on the SEP maps as defined in CEMP section 5.5.1 (e.g stockpile locations, monitoring locations and type).	Actions to address this finding have not been formally implemented. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

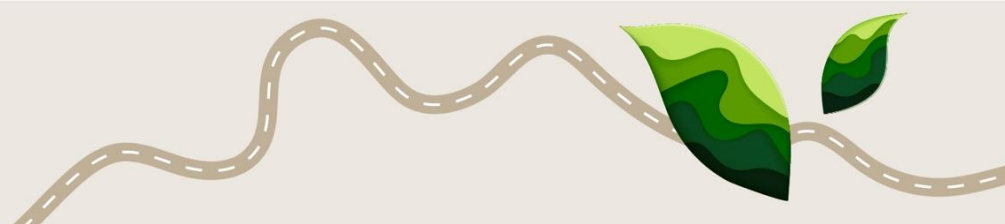
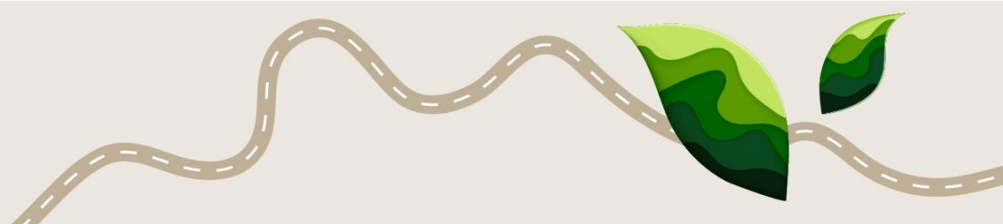


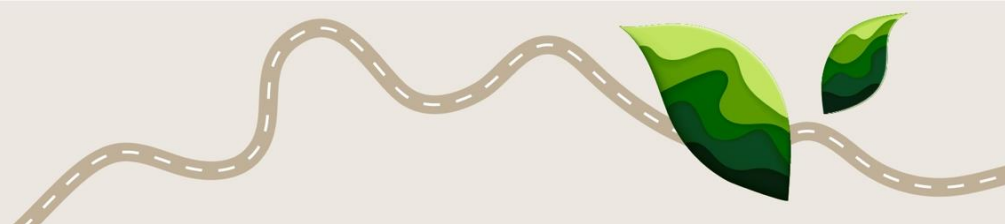
Table 13: Findings raised against the WEMPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-23	IEA-0523-03	O	<b>WEMP 20 Winsor 9.14 Surface Water:</b> Sections of the sediment fence along the western boundary required repair and reinstatement.	A sediment fence and a bund with a retaining wall was in place. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jun-23
May-23	IEA-0523-04	O	<b>WEMP 23 Blamey to Drysdale 9.5 Contamination and Soil:</b> There was no signage in place or on the SEP to identify a stockpile potentially contaminated with ACM.	Signage for the stockpile at Lower Plenty was in place. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jun-23
May-23	IEA-0523-05	O	<b>WEMP 23 Blamey to Drysdale 9.14 Surface water:</b> Dewatering stopped based on water quality monitoring, but this had not been recorded.	Dewatering records were sighted. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23
May-23	IEA-0523-06	Afl	<b>WEMP 24 Drysdale to Lower Plenty Road 4 Working hours:</b> An unreported D-Wall concrete pour occurred after the permitted time as per the approved unavoidable OOH permit NEL-POH-325.	Spark initiated actions to minimise the risk or a reoccurrence including training personnel regarding OOH permits. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23
May-23	IEA-0523-07	O	<b>WEMP-24 Lower Plenty - Drysdale to Lower Plenty Road 10 Monitoring and Compliance:</b> Not all observations marked as being non-compliant during weekly inspections had actions recorded in Synergy.	Actions from subsequent inspections were sighted and recorded in Synergy. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-23

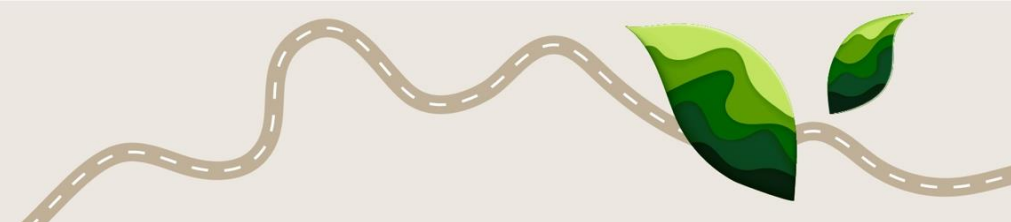


Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
May-23	IEA-0523-08	O	<p><b>WEMP 26 – Bulleen Cut &amp; Cover 9.14 Surface Water:</b> Drains in the carpark at the old Bulleen Swim School site were not protected. The site is a mix of existing asphalt and gravel. Drains from the southern side of the carpark drain directly into Koonung Creek.</p>	<p>Appropriate drain protection was installed. This finding related to on site environmental controls and represented a medium risk to the environment.</p>	Closed	Jun-23
May-23	IEA-0523-09	Afl	<p><b>WEMP-26 Bulleen 10 Monitoring and Compliance:</b> The water quality monitoring spreadsheet for the South could not clearly demonstrate compliance with dewatering permit conditions. A number of record keeping errors were present in the dewatering monitoring records spreadsheet. This included incorrect dewatering permit (PTD 54) listed against the water quality results, unclear descriptors of the monitoring location, and dewatering times not clearly recorded. The current dewatering permit (PTD 66) did not have an expiry date recorded on the issued permit.</p>	<p>Spark is developing a comprehensive monitoring and discharge procedure. This was not fully implemented in the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.</p>	Open	

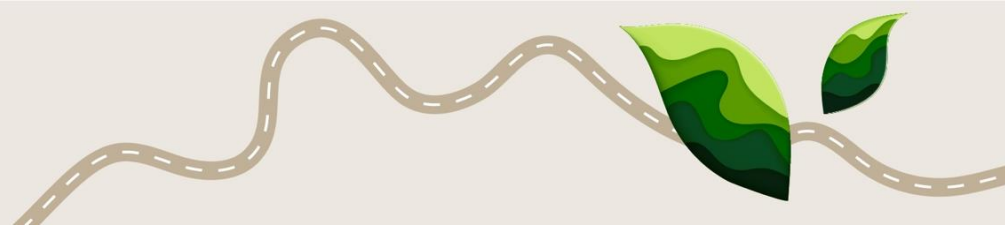




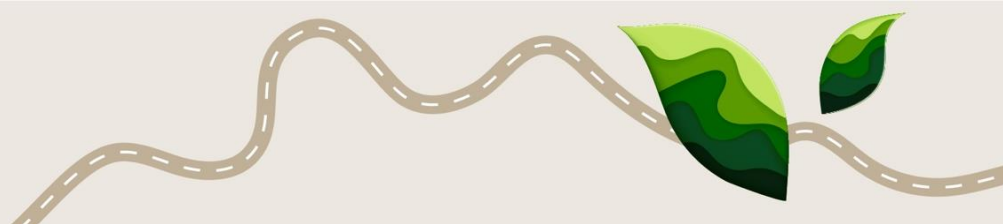
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-23	IEA-0523-10	Afl	<b>WEMP 27 - Bulleen SRD 9.14 Surface Water:</b> Trucks were observed exiting Bulleen SRD site without using wheel wash or rumble grids. Trucks exiting directly from exposed soil onto public road resulting in mud tracking. Water cart was observed on multiple occasions washing Bulleen Road under traffic control, resulting in sediment being washed down stormwater drain without sediment controls in place.	Spark initiated sediment controls to reduce mud tracking. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23
Jun-23	IEA-0623-22	Afl	<b>WEMP-23 Blamey to Drysdale 9.12 Noise and Vibration:</b> A squeaky dozer was observed at Lower Plenty which has resulted in repeated community complaints over several weeks.	The dozer was demobilised from site. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jul-23
Jun-23	IEA-0623-23	Afl	<b>WEMP 24 Drysdale to Lower Plenty Road 4 Working hours:</b> An unreported use of an excavator not included in the approved OOHW permit NEL-POH-354 was observed.	Spark undertook corrective actions to include relevant plant and equipment on the OOH permit. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jul-23
Jun-23	IEA-0623-24	Afl	<b>WEMP 26 Bulleen Cut &amp; Cover 9.5 Contamination and Soil:</b> Evidence of a diesel spill observed near the generator to power the satellite crib huts at Bulleen Cut & Cover had not been reported or cleaned.	The area was cleaned. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jul-23



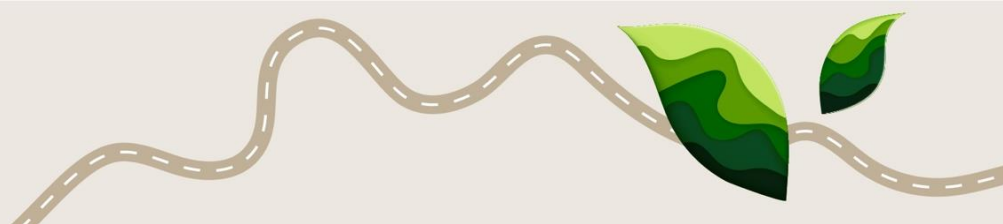
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jul-23	IEA-0723-02	O	<b>WEMP-0018 10.7 Contamination of soil:</b> The portable bund used for the storage of muds and chemicals at the River Gum Walk geotechnical site investigation microsite was not adequately installed.	The site investigations micro site was demobilised soon after this observation. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Aug-23
Jul-23	IEA-0723-03	N	<b>WEMP 24 – Section 11 Emergency Response and Incident Management:</b> Management and reporting of bentonite spill (on 17/07/23) was not in accordance with documented procedures and management plans.	Spark concluded an appropriate incident investigation. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Jul-23	IEA-0723-04	Afl	<b>WEMP-0027 Bulleen SRD 3 Scope:</b> The scope and maps for WEMP-0027 Bulleen SRD have not been updated to reflect works and extended boundary associated with works in the new Carey parcel 3 area.	The WEMP has been revised to reflect the scope of works underway. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Jul-23	IEA-0723-05	Afl	<b>WEMP-0029 Manningham Demolition 3 Scope:</b> The scope and maps for WEMP-0029 Manningham Demolition have not been updated to include the Boral batch plant.	The WEMP has been revised to reflect the scope of works underway. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-23



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jul-23	IEA-0723-06	O	<b>WEMP-25 Manningham 9.5 Contamination and Soil:</b> Sediment laden water was observed spilling on to a concrete pad due to a failed hose connection between the bentonite bund sump pump and the settling tanks.	The area has been cleaned and no further spills observed. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Aug-23
Jul-23	IEA-0723-07	O	<b>WEMP-26 Bulleen Cut and Cover 9.14 Surface Water:</b> Silt logs used to protect one of the stormwater drains in the former swim centre car park had been damaged.	The sediment controls were observed to be appropriate. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Aug-23
Jul-23	IEA-0723-08	O	<b>WEMP-29 Manningham Demolition 9.14 Surface Water:</b> Sediment fences along parts of the Manningham demolition boundary were not fully effective.	Sediment controls were progressively installed along the site boundary. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Aug-23	IEA-0823-01	O	<b>WEMP-18 10.7 Contamination of soil:</b> Not all controls for the management of chemicals and fuels at site investigations microsites were fully implemented.	Action to address this was closed. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Sep-23
Aug-23	IEA-0823-02	O	<b>WEMP-21 9.5 Contamination and Soil:</b> DGs and chemicals inappropriately stored at Vent Tunnel in the traffic team laydown area.	Good housekeeping and storage of DGs and chemicals in the Traffic team laydown area was subsequently observed. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Oct-23



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Aug-23	IEA-0823-04	Afl	<b>WEMP-29 9.2 Air Quality:</b> Dust controls as described in the WEMP and the DAQMMP were not fully effective to manage dust from the fill material stockpile and asbestos stockpile. This resulted in a complaint from the Bulleen Rd traders and an EPA visit.	Documents as requested by EPA in the site entry report have been provided. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Sep-23	IEA-0923-12	N	<b>WEMP-29 9.3 Aboriculture:</b> A light vehicle was parked in a TPZ at Manningham BIZ.	Actions were implemented to immediately move the vehicle. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Oct-23
Oct-23	IEA-1023-01	Afl	<b>WEMP-20 9.11 Landscape and Visual:</b> Construction related debris and litter was observed in the publicly accessible area of Winsor Reserve.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a low risk to the environment.	Open	
Oct-23	IEA-1023-02	N	<b>WEMP-20 9.16 Traffic and Transport:</b> Project cars were observed parked in no project parking areas on Somers Avenue.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Oct-23	IEA-1023-03	Afl	<b>WEMP-24 9.14 Surface Water:</b> Water with slightly elevated turbidity from the Lower Plenty Desanding Plant basin was discharged to Banyule Creek on 5 Oct 2023 under permit NEL-PTD-107.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Oct-23	IEA-1023-06	Afl	<b>WEMP-31 2 Requirements:</b> Trade waste discharged from the Smoke Shaft water treatment plant with elevated pH	Actions to address this finding have not been formally implemented.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
			level of 10.3 against a discharge criterion of 10 was not reported in Synergy.	This finding related to on site environmental controls and represented a low risk to the environment.		
Oct-23	IEA-1023-08	O	<b>WEMP-27 9.13 Noise and Vibration:</b> A tonal movement alarm was observed at Bulleen SRD.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a low risk to the environment.</p>	Open	
Oct-23	IEA-1023-09	O	<b>WEMP-27 9.14 Surface Water:</b> Not all sediment controls were effectively implemented.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a medium risk to the environment.</p>	Open	
Oct-23	IEA-1023-10	O	<b>Trawalla SEP Contamination and spoil:</b> No nearby spill kit at the truck unloading area.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a low risk to the environment.</p>	Open	

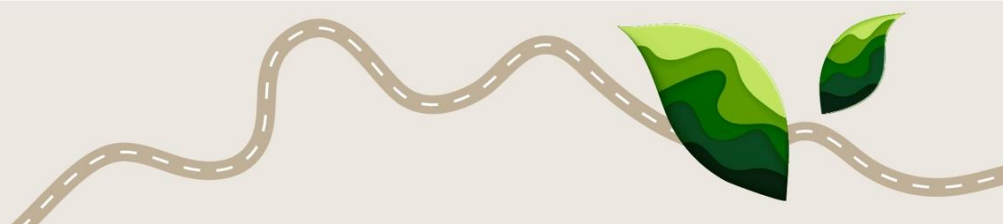
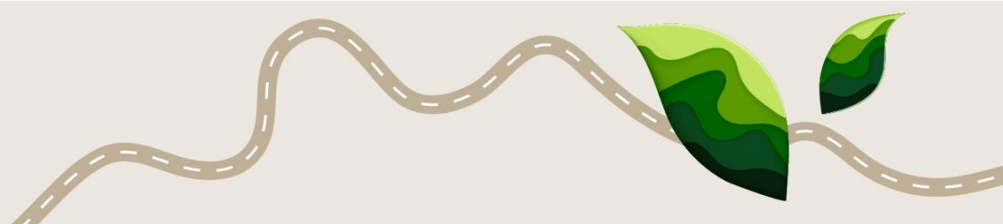


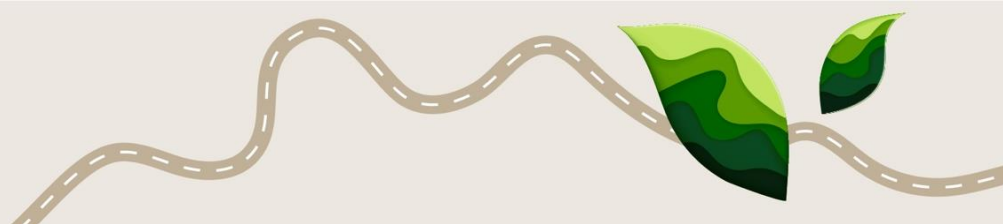
Table 14: Findings raised against the Management Plans

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-23	IEA-0523-11	Afl	<b>CCEMP 4.3 Resolve Issues Quickly by Always Being Available:</b> Complaints received during OOHW Breaches are not readily actioned as per the CCEMP complaints management processes.	Spark has developed new and revised processes and procedures for responses to complaints and initiated staff training. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Aug-23
Jun-23	IEA-0623-09	Afl	<b>CNVMP 6.4.1 Noise and Vibration Monitoring:</b> Unattended noise monitoring in the south is not conducted in accordance with the CNVIA risk profile and management plans.	Unattended noise monitors have been installed with appropriate alarm levels and reporting in place. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Jun-23	IEA-0623-10	O	<b>DAQMMP 6.3.2 Air Quality Risk Assessments.</b> Assessment and management procedures for airborne pollutants and hazards have not been developed for each worksite as part of the WEMPs. It is noted that WEMPs include general air quality management and monitoring procedures and requirements.	Spark has updated the Dust and Air Quality Management Plan. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Jun-23	IEA-0623-11	O	<b>DAQMMP 9.1.2 Monitoring.</b> There is only one weather station at the north of the project, and not one in the south.	A weather station has been installed at Bulleen cut and cover (at Trinity South). This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Jul-23

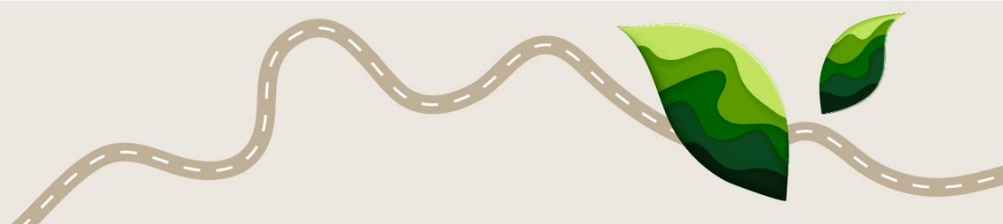


Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jun-23	IEA-0623-12	O	<b>DAQMMP 9.1.3 Environmental monitoring system.</b> Hand held electronic air quality and odour monitors are not in use.	Spark has updated the Dust and Air Quality Management Plan. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Sep-23
Jun-23	IEA-0623-13	O	<b>EcMP Control CE12.</b> The fauna interaction register does not include all the defined information, including the sex and age of the relocated animal.	The Ecology Management Plan has been updated. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Aug-23
Jun-23	IEA-0623-14	N	<b>EMMP:</b> Monitoring as outlined in the EMMP not fully implemented as documented or aligned with monitoring requirements in the WEMP and Sub-Plans. For example, the location of real time monitors or the use of monitors other than those defined in the EMMP are inconsistent with details noted in other environmental EPR plans and WEMPs.	The Environmental Monitoring and Management Plan has been updated to align monitoring requirements with WEMPs and the Sub Plans. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Jun-23	IEA-0623-15	N	<b>Green Infrastructure MP:</b> Not all processes and commitments documented in the GIMP have been implemented or established to integrate with other relevant EPR management plans.	A process has been established to review the GIMP and identify required revisions. This was not finalised during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-23	IEA-0623-16	O	<b>Sustainability MP 4.3.1.1 Design Development: Design:</b> Design package 7710 was not reviewed by the sustainability team as per the	DP 7710 has been reviewed by the Sustainability team.	Closed	Jul-23

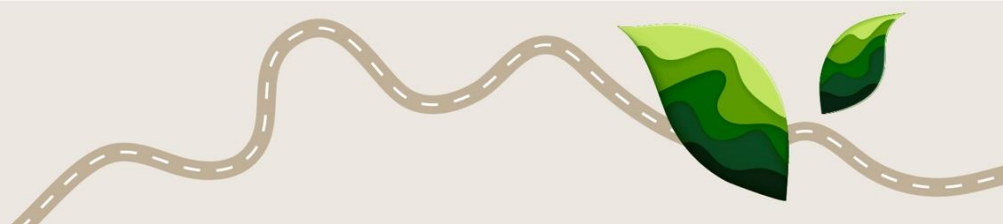




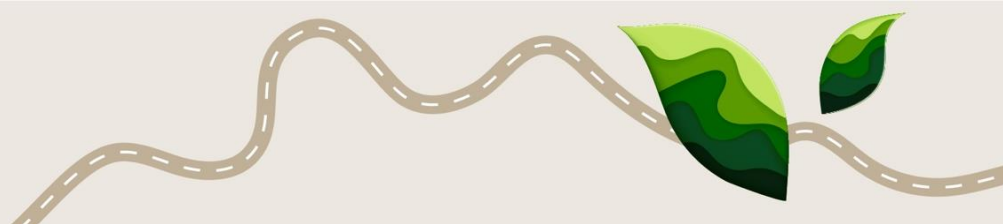
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
			Interdisciplinary Design Review (IDR process).	This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Jun-23	IEA-0623-17	Afl	<b>SMP 4.5.3 Sustainability Site Inspections:</b> Sustainability inspections have not been formally implemented to verify effectiveness of sustainability process and collection of sustainability performance metrics.	Spark is implementing sustainability site walks. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	July 23
Jun-23	IEA-0623-18	Afl	<b>Spoil MP 2.2 Contract Requirements:</b> Weighbridges have not been installed or commissioned at all sites.	Weighbridges have been installed at all locations where spoil is being removed from site except for fill material from Vent Tunnel, for which Spark has received an email waiver from NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Jun-23	IEA-0623-19	O	<b>Spoil MP 8.11.1.1 Odour Management:</b> Odour management procedures have not been established as described in the plan.	Spark is reviewing and revising the Spoil Management Plan. This was not finalised during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-23	IEA-0623-20	N	<b>Spoil MP 10.5 Reporting:</b> Monthly spoil summary report does not contain all relevant information as required by the PSDR. For example, certified weighbridge dockets are missing.	Spark is generating the spoil data required by the contractual reporting requirements. This was not finalised during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	



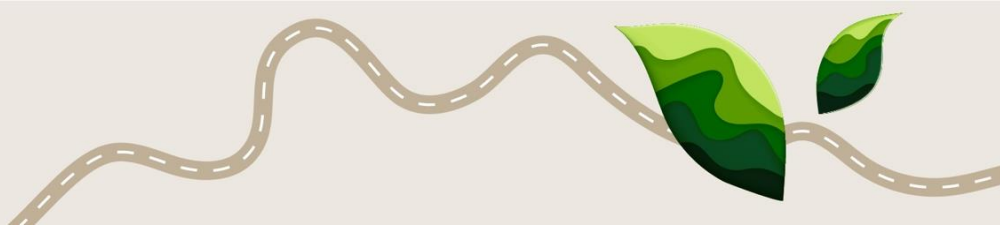
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jul-23	IEA-0723-01	N	<b>CNVMP – Section 6.6.3 Complaints:</b> Permitted OOH Works on 27 <sup>th</sup> and 28 <sup>th</sup> June at Lower Plenty (D-walls) were carried out with unauthorised plant, resulting in noise complaints. The process was not managed in accordance with the CNVMP and CCEMP complaints process, resulting in works continuing.	Spark has delivered training on the requirements of Out of Hours permits across the workforce. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Aug-23
Aug-23	IEA-0823-05	Afl	<b>DAQMMP 9.1.3 Environmental monitoring system:</b> The AirMet monitors in the South did not have established alarm levels.	1 hourly and 24 hour alarms levels have been established as required by the DAQMMP. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Aug-23	IEA-0823-06	Afl	<b>CNVMP 7.1 Controls for Surface and Ground-borne Noise:</b> Controls to mitigate noise impacts from vehicles including delivery and NDD trucks, as described in the CNVMP (e.g. section 7 and controls CN04, CN05, CN09, CN10), were not fully effective.	No noticeable adverse noise emissions from vehicles were subsequently observed. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Sep-23
Aug-23	IEA-0823-07	Afl	<b>EMMP 5.3.1 Attended Monitoring:</b> Conduct and management of attended noise monitoring in the South including records to validate OOHW permits was not fully effective.	Spark has conducted ongoing validation monitoring. Data was being updated in the monitoring register. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Oct-23



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Aug-23	IEA-0823-08	N	<b>SWMP 9.1.4 Surface Water Dewatering criteria:</b> Discharge from Trinity Lake continued under permit NEL-PTD-098 even though the recorded electrical conductivity was above the permitted ERS level of 500 uS/cm.	Further discharge has not been permitted as the electrical conductivity of the water in Trinity Dam has not reduced below the ERS level of 500 uS/cm. Arrangements for alternative disposal methods such as to trade waste will be arranged as required. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23
Sep-23	IEA-0923-05	Afl	<b>Asbestos Management Plan 4.4.1 Signs and Barricades</b> – Not all stockpiles containing asbestos were adequately managed in accordance with the Asbestos Management Plan.	Asbestos stockpiles subsequently observed were adequately sign posted. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Oct-23
Sep-23	IEA-0923-06	Afl	<b>Spoil MP 8.3 Stockpile Management:</b> Spoil stockpiles were incorrectly signed.	Stockpiles subsequently observed were adequately sign posted. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Oct-23
Sep-23	IEA-0923-07	Afl	<b>Spoil MP 8.3 Stockpile Management:</b> The large fill material stockpile at Manningham was not appropriately stabilised.	Spark implemented some measures to stabilise the stockpile, however not all measures were implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Sep-23	IEA-0923-08	Afl	<b>Surface Water MP 6.3.3.1 Wastewater management:</b> Inconsistencies in the processes that prescribe the controlled discharge of non-construction or construction water from site were noted in	Spark is developing an Environmental Monitoring Procedure to manage controlled discharges. This was not finalised during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
			the SWMP, EMMP and the Dewatering and Discharge Procedure.			
Sep-23	IEA-0923-09	O	<b>SWMP 9.1.1 Monitoring program:</b> The water quality instream monitor at Bolin Bolin was only partially submerged and the turbidity chart was observed to flat line for notable periods at around 500 NTU.	Spark has repaired the monitor and it is returning accurate data. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Oct-23
Sep-23	IEA-0923-10	Afl	<b>SWMP 9.1.4 Surface Water Dewatering criteria:</b> Controlled discharge of non-construction water sourced from the Trinity Wetland (which is located upstream of the project area) did not fully meet the ERS for electrical conductivity.	Spark is developing an Environmental Monitoring Procedure to manage controlled discharges. This was not finalised during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Sep-23	IEA-0923-11	N	<b>Transport Management Plan:</b> The TMP (Rev 0 IFU June 2022) has not been reviewed in accordance with the 6-monthly review schedule.	Spark is reviewing the Transport Management Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-23
Oct-23	IEA-1023-04	Afl	<b>CNVMP 6.6.2 Permit to Work Out of Hours:</b> The Lower Plenty D-wall OOH permit NEL-POH-506 and the noise model had not been updated to include chiselling activity works.	Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Oct-23	IEA-1023-05	N	<b>GWMP 10 Baseline Conditions:</b> The stage 2 baseline plan with set groundwater levels and trigger levels for individual monitoring wells had not been submitted two weeks prior to bulk	Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
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excavation below the groundwater table at Watsonia as per the process described in the Groundwater Management Plan.

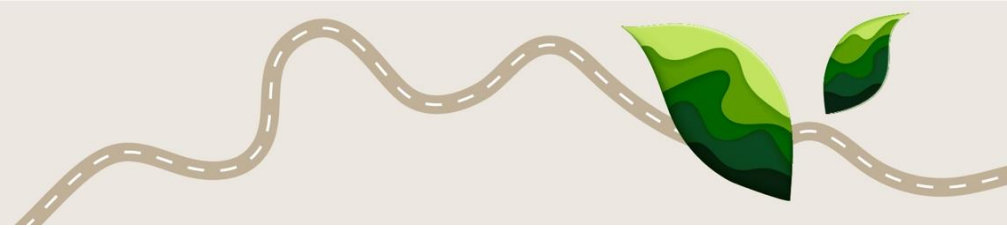


Table 15: Findings raised against the CCPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Sep-23	IEA-0923-13	Afl	<b>CCP 0011 Winsor Reserve Spoil Handling Facility 3.8 Management of Impacts:</b> Hoarding installed along the south-west boundary exceeds the 6m height identified in the CCP	Spark is investigating options for the hoarding in consultation with affected stakeholders. This was not finalised during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Sep-23	IEA-0923-14	Afl	<b>CCP 0004 Lower Plenty Structures Compound 3.1 Compound:</b> The buildings (site huts and ablutions) for the Lower Plenty Mini-Compound are outside area identified in the CCP maps.	Spark is revising the Construction Compound Plan for submission to the Minister. This finding related to on site environmental controls and represented a low risk to the environment.	Open	

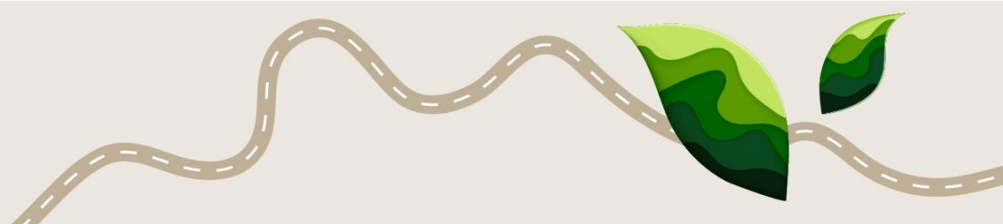
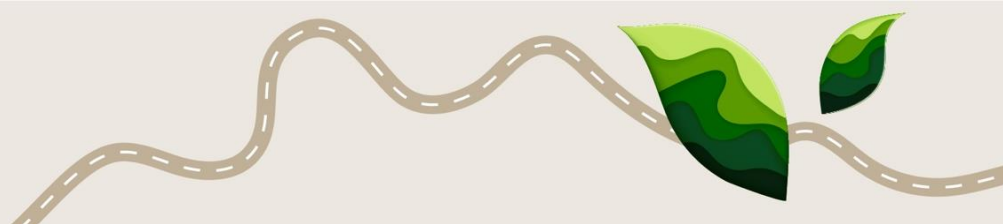


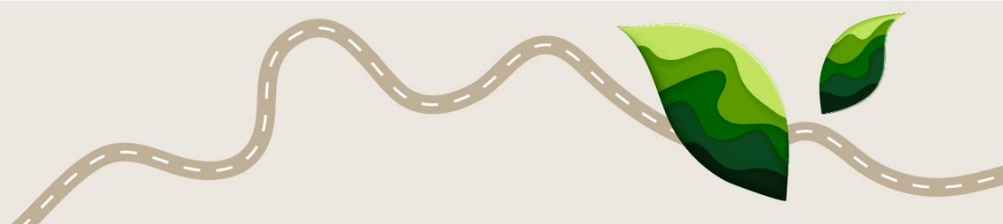
Table 16: Previous open audit findings

Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Aug-22	IEA-0822-03	Afl	<b>CEMP 5.2 Key Risk Objectives and Targets:</b> The objectives and targets are not quantitative or measurable, and tracking progress towards meeting these is not in place.	Spark has developed revised objective and targets which align with the objectives in the Environmental Strategy and the Sustainability MP. Spark has updated and documented this process in a revised version of the CEMP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-23
Aug-22	IEA-0822-04	N	<b>CEMP 5.5 Project Plans</b> Not all management processes and requirements specified in the CEMP, sub-plans, or other EPR plans including the Sustainability MP, CCEMP and TrMP, have been implemented as described.	Spark has progressively updated and revised Management Plans. These have been reviewed by the IEA for compliance, and by NELP for acceptance. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Sep-23
Aug-22	IEA-0822-05	N	<b>CEMP 5.5.2. Worksite environmental management plans:</b> Controls identified in SEPs are not consistent or always aligned with WEMPs and Sub Plans.	Spark has revised and updated Site Environmental Plans to include key environmental controls and align with controls defined in the WEMPs. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-23
Aug-22	IEA-0822-07	Afl	<b>CEMP 8. Environmental training and awareness.</b> While good progress has been made, not all the training defined	Spark has developed revised training needs.	Closed	Jun-23

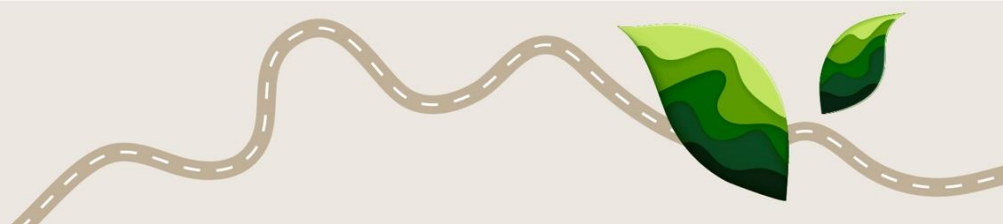




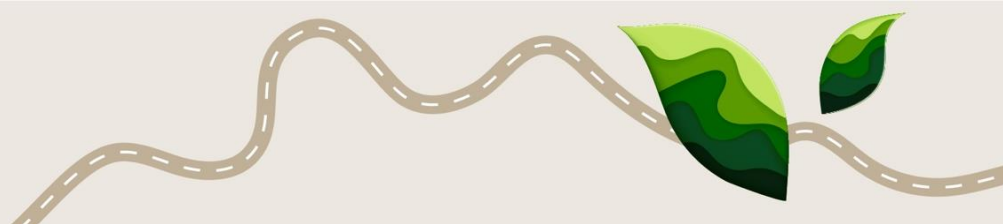
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
			in the CEMP and CEMP Sub Plans is being delivered.	Spark has updated and documented this process in a revised version of the CEMP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Aug-22	IEA-0822-08	Afl	<b>CEMP 9.1. Monitoring.</b> Monitoring requirements in the CEMP, Sub Plans, and WEMPs are not being managed and conducted as defined.	Spark has documented monitoring to reflect project environmental monitoring requirements. Spark has updated and documented this process in the Environmental Monitoring and Management Plan. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jun-23
Aug-22	IEA-0822-10	Afl	<b>CEMP 9.3.1 Internal environmental audits:</b> Internal audits have not commenced for management plans that have been issued for use. PSDR Part F1 1.11 requires internal audits to commence from financial close.	Spark has developed an internal audit schedule and commenced undertaking audits. Spark has updated and documented this process in a revised version of the CEMP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-23
Aug-22	IEA-0822-11	O	<b>CEMP 10.3.3.1 Immediate reporting [incidents].</b> Incident notification requirements in the EMF are not documented in the CEMP. No agreement with the State on formal incident reporting is documented.	Spark has included the requirements for immediate reporting of incidents in a revised CEMP. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period.	Closed	Jun-23



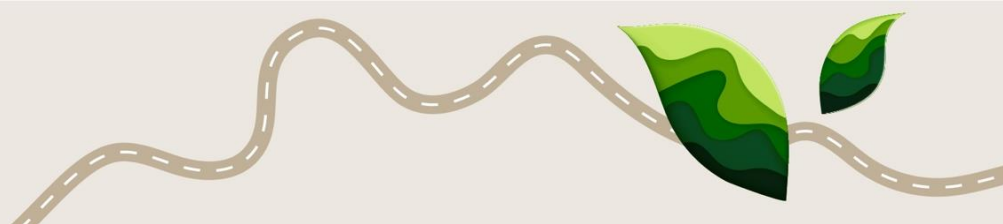
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
				This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Aug-22	IEA-0822-15	Afl	<b>CNVMP 5.5 Construction activities:</b> The noise barrier on the west side of Greensborough Road adjacent to Powley Parade was removed before applicable new or temporary noise barriers (including noise walls) or other noise attenuation devices was commissioned (PSDR Part F6 s3(d)).	Spark has reached agreement with affected stakeholders for noise mitigation measures. Installation of these mitigation measures is progressing.  This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Aug-22	IEA-0822-16	Afl	<b>CNVMP 6.6.2 Permit to Work Out of Hours:</b> The IREA approval timeline and the notification timeline for unavoidable OOH permits has not always met the procedure described in the CNVMP and associated procedures.	The OOH permit form and the process flow have been revised in the draft CNVMP. Spark has updated and documented this process in a revised version of the CNVMP.  This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Sep-23
Aug-22	IEA-0822-17	Afl	<b>CNVMP Section 7 CN08:</b> Noise hoarding was not installed prior to commencement of vegetation clearing and grubbing construction works at Northern to Yallambie as required in the associated WEMPs. The specified height of the noise hoarding height in the Northern to Yallambie SEP was only	Spark has progressively installed noise hoarding, and this was completed during the reporting period.  This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Sep-23



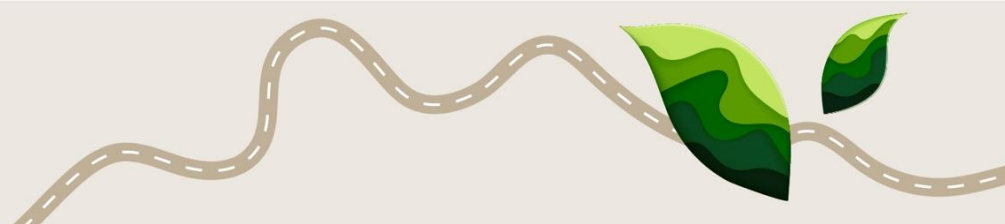
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
			2.4 m instead of the 3 metres specified by the associated WEMP and CNVIA.			
Oct-22	IEA-1022-01	Afl	<b>Environmental Strategy 3.3.2.2 Environmental collaboration across D&amp;C:</b> There is no design environmental compliance report prepared to verify compliance of the relevant design phase as noted in section 3.3.2.2 of the Environmental Strategy.	The Environmental Strategy has been revised. This process was documenting in a revised version of the Environmental Strategy verified by the IEA and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Oct-22	IEA-1022-02	Afl	<b>Environmental Strategy 7.1 Management Reviews and Continuous Improvement:</b> A six-monthly management review of the Development Phase management plans as required by the PSDR has not occurred.	The Environment Strategy has been updated. This process was documented in a revised version of the Environmental Strategy verified by the IEA and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-23
Oct-22	IEA-1022-03	Afl	<b>CEMP 5.1.1 Environmental Aspects, Activities and Impacts:</b> Environmental opportunities are not identified in the Aspects and Impacts Register, as required by ISO 14001.	Spark has developed the Risk Register to include Opportunities. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-23
Oct-22	IEA-1022-04	Afl	<b>CEMP 6.5 Environment in Design:</b> The process for validating integration of EPRs in temporary packages is not formally established.	Spark has revised the CEMP section for Environment in Design. Spark has updated and documented this process in a revised version of the CEMP. This finding related to documented environmental management arrangements that unrectified had the	Closed	Jun-23



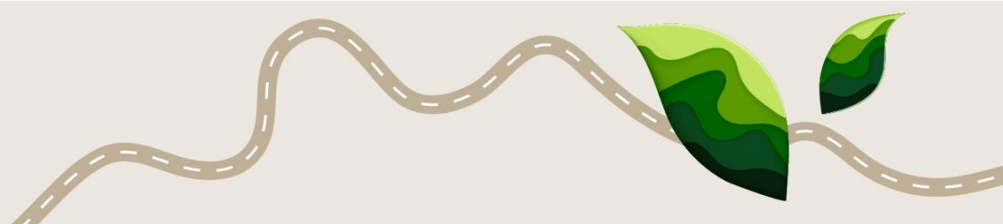
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
				potential to present an environmental risk to the project.		
Oct-22	IEA-1022-06	Afl	<b>Flood MP 6.2.4 Flood Emergency Procedures and Response.</b> Not all flood planning, preparation and response measures were implemented.	Spark has revised the Project emergency action plans, procedures, and controls. Spark has updated and documented this process in a revised version of the Flood Emergency Management Plan. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23
Dec-22	IEA-1222-01	Afl	<b>EPR AQ6:</b> Contract arrangements with for haulage vehicle fleet contractors have not included the incentives for them to comply with Euro V European emission standards.	Spark has updated the vendor qualification portal Felix to include a provision to check whether haulage contacts carry Euro V European emission standards. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-23
Dec-22	IEA-1222-02	Afl	<b>EPR SW8:</b> It is unclear whether flow modelling for modifications to surface drainage along the northern central package alignment has accounted for drainage blockages and flow restrictions in existing drains on Greensborough Road.	The drainage design for Greensborough Road has considered blockage in analysis of major storm events Flood modelling has also considered blockage. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	May-23
Dec-22	IEA-1222-03	Afl	<b>EPR SW8:</b> Not all relevant design packages with waterway modifications	Spark ensured that Design Packages were addressing relevant EPRs.	Closed	May-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
			have adequately addressed the requirements of EPR SW8.2	This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.		
Dec-22	IEA-1222-04	Afl	<b>CEMP 6.5 Environment in Design:</b> Not all permanent design packages with EPR requirements are reviewed by the Environment Team as per Spark D&C Design Management Plan.	Spark has revised the CEMP section for Environment in Design. Spark has updated and documented this process in a revised version of the CEMP. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jun-23
Feb-23	IEA-0223-03	Afl	<b>Construction Noise and Vibration Management Plan 7.2 Controls for Unavoidable Works During Night-time:</b> Attended noise monitoring during unavoidable OOH works not always conducted as per the Gatewave requirements across the project.	Spark has undertaken relevant attended noise monitoring. The modelling reports have been revised to reflect the required processes. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Mar-23	IEA-0323-01	N	<b>EPR CL1:</b> Full implementation of Spoil Management Plan could not be demonstrated at time of audit.	Spark raised corrective actions to ensure roles and responsibilities are clear and appropriately exercised. This remains a work in progress. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jun-23

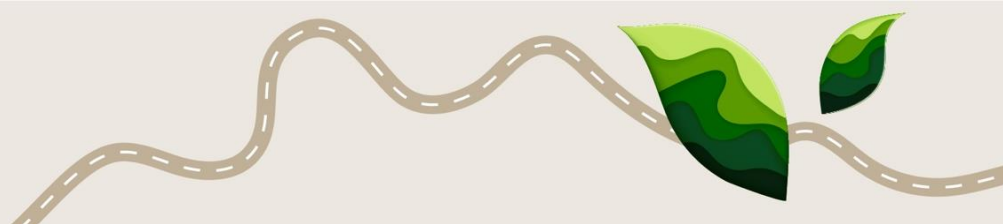


Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Mar-23	IEA-0323-02	O	<b>EPR FF8:</b> Mitigation measures to minimise noise and vibration impacts on Australian Grayling are not clearly documented within Sparks management systems. It is noted that impacts are largely avoided by the current design and location of works however this is not clearly captured. Selection of work methods, avoiding activities that may generate intense noise and vibration, with respect to FF8 are not clearly documented.	Spark has engaged a consultant to assess and document any mitigation measures to minimise noise and vibration impacts on Australian Grayling. This was not finalised during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	
Mar-23	IEA-0323-03	O	<b>EPR HH4 Undertake archival photographic recording:</b> No evidence to demonstrate that the photographic records taken of the River Red Gum tree 8017 have been taken to the satisfaction of Heritage Victoria	Spark's heritage consultant has that as the tree is not listed as VHI or VHD archival photography is not required. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-23
Mar-23	IEA-0323-06	O	<b>CEMP 9.1 Internal audits:</b> The draft audit schedule does not define or apply a risk-based approach for audits of suppliers and subcontractors.	Spark updated the internal audit schedule and CEMP. CEMP is currently with IREA. Finding remains open until CEMP has been reviewed and issued for use. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-23
Mar-23	IEA-0323-07	Afl	<b>CCEMP 7 Evaluation and Monitoring:</b> Monitoring and reporting of key performance indicators to demonstrate	Spark has revised the CCEMP and developed tools to assess the effectiveness of community consultation and engagement methods.	Closed	Aug-23

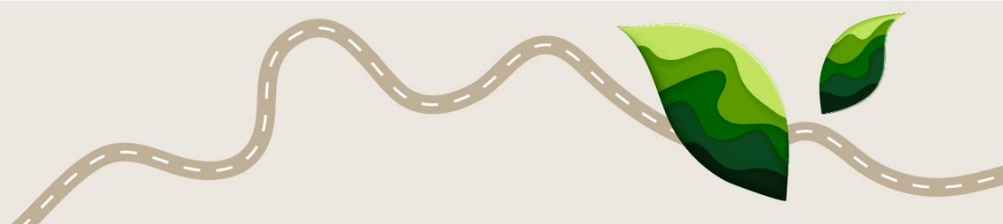


Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			effectiveness of community consultation and engagement methods and targets are not fully implemented.	This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.		
Mar-23	IEA-0323-08	Afl	<b>CNVMP 4.2 Construction Noise and Vibration Impact Assessments:</b> Update to CNVMP required to accurately describe the processes including: <ul style="list-style-type: none"> <li>• Validation of background noise data</li> <li>• Attended monitoring requirements</li> <li>• CNVIA process for managing recommendation</li> <li>• Process to confirm effectiveness of controls.</li> </ul>	Spark has revised the CNVMP to reflect the actual processed in place.  This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Sep-23
Mar-23	IEA-0323-10	O	<b>EcMP 9.1.1 Pre-construction site surveys:</b> TPZ inspection reports completed by external consultants are raising actions that are not being captured or tracked via Synergy in the South. For example, signage required at TPZ not raised as an action by Spark in the management system, therefore it could not be determined if the action had been closed at the time of the audit.	The Spark environment team enters actions from arborists reports into Synergy.  This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	May-23
Mar-23	IEA-0323-11	Afl	<b>IS Rating Plan 3.1.3 Credits progressed: Lea-1:</b> Contribution to the UN SDGs was not identified in public	This credit is project wide and NELP is responsible for public reporting. An independent review process was in place.	Closed	May-23

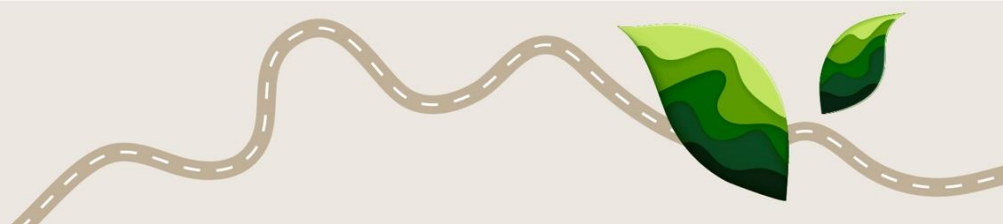




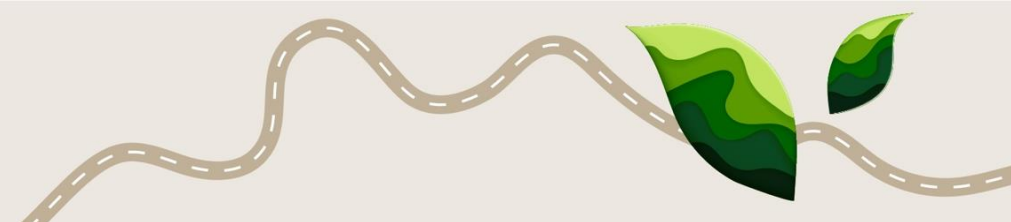
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			reporting. It is not clear if reporting is independently reviewed.	This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.		
Mar-23	IEA-0323-12	Afl	<b>IS Rating Plan 3.1.3 Credits progressed Rso-4:</b> The use of recycled materials has not yet been specified and is accordingly not being tracked.	Modelling of the recycled materials contents is being tracked and specified in design reports. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jun-23
Mar-23	IEA-0323-13	Afl	<b>IS Rating Plan 3.1.3 Credits progressed Rso-6:</b> The design baseline for materials has not yet been defined.	A baseline is part of the ISCA design submission and final material design package. This is not expected until June 2024. An interim measure is in place. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Jul-23
Mar-23	IEA-0323-14	Afl	<b>IS Rating Plan 3.1.3 Credits progressed. Wat-1:</b> Water consumption and savings data are not clearly quantified.	Tracking of water consumption has commenced; however no aggregate data are available. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Mar-23	IEA-0323-15	Afl	<b>TMP 3.16.7 Parking Management:</b> The defined off-site parking for the construction workforce with a shuttle bus	Site car parks have been established and shuttle bus is operating in the south. This finding related to on site environmental	Closed	May-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			to works areas has not been implemented. On-site parking is a work in progress. It is noted that there have been a number of complaints from residents about project parking in nearby streets.	controls and represented a medium risk to the environment.		
Apr-23	IEA-0423-01	O	<b>WEMP 19 Northern to Yallambie 9.13 Social and Community:</b> Section 9.10 - Complaint received during OOHW Breach was not actioned as per the CCEMP. Complaint was not forwarded to site team at night; therefore no action was taken to rectify the noise.	The Spark Environment Team has met with Comms Teams to confirm the complaints management process. Evidence that the complaint was analysed and recorded was noted. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Apr-23	IEA-0423-02	Afl	<b>WEMP 19 Northern to Yallambie 9.5 Contamination and Soil:</b> Multiple spoil trucks observed leaving site with uncovered loads. Trucks were exiting with fully open tarps on both truck and trailer, or partially covered loads.	Spark conducted an education session with drivers and traffic personnel. Trucks leaving site were subsequently observed with covers extended and loads covered. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Apr-23	IEA-0423-03	O	<b>WEMP 23 Blamey to Drysdale 9.3 Arboriculture:</b> Specific actions raised from Arborist Report for managing potential tree impacts are not formally captured in system. Documentation (WEMP) requires update to include recommended controls, including monitoring for two years post impact,	A process to capture actions has been included in the WEMPs. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Jun-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
			watering, and change to construction methodology.			
Apr-23	IEA-0423-04	Afl	<b>WEMP 26 Bulleen Cut &amp; Cover 9.5 Contamination and Soil:</b> Evidence of a diesel spill observed near the generator for the temporary crib huts at Bulleen Cut and Cover had not been reported or cleaned. Further there was no spill kit observed near the generator.	Spill was cleaned up and recorded in Synergy. Spark undertook communication with the work site on reporting all environmental incidents when they occur. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Apr-23	IEA-0423-05	O	<b>WEMP-26 Bulleen Cut &amp; Cover 9.2 Air Quality:</b> Nuisance dust observed leaving the Bulleen Cut and Cover works area.	Dust management controls in place during subsequent site inspections. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Apr-23	IEA-0423-06	O	<b>WEMP 27 Bulleen SRD 9.5 Contamination and Soil:</b> Hazardous chemicals were observed stored outside the designated bunded areas at Bulleen SRD.	Hazardous chemicals were subsequently observed correctly stored at Bulleen SRD. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	May-23
Apr-23	IEA-0423-07	O	<b>WEMP 27 Bulleen SRD 9.6 Flora and Fauna:</b> A fauna relocation at Carey was not included in the relocation register.	The fauna relocation register was subsequently sighted and was up to date. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-23
Apr-23	IEA-0423-08	Afl	<b>WEMP 29 Manningham Demolition 9.14 Surface Water:</b> An unprotected stormwater drain at Greenaway Street	Drain guards (guard dogs) have been installed throughout the Bulleen Industrial Zone. Additional	Closed	May-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			(north of Manningham Rd) was impacted by sediment and debris associated with the nearby demolition works.	sediment and erosion controls have also been installed. This finding related to on site environmental controls and represented a medium risk to the environment.		
Apr-23	IEA-0423-09	O	<b>WEMP 26 Bulleen Cut and Cover 10 Monitoring and Compliance:</b> Not all observations made during inspections that require follow-up actions are being recorded in Synergy.	Actions were observed to be recorded in Synergy. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	May-23



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