

Melbourne Metro Rail Project

PREPARED FOR METRO TUNNEL PROJECT

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MAIN WORKS (RAIL NETWORK ALLIANCE)
ENVIRONMENTAL AUDIT SUMMARY
REPORT 2024

14 MARCH 2025

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This document should be read in full and no excerpts are to be taken as representative of the findings.

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Glossary

TERM / ABBREVIATION	DESCRIPTION
AQMP	Air Quality Management Plan
AQIA	Air Quality Impact Assessment
AJM JV	Aurecon Jacobs Mott MacDonald Joint Venture
BDP	Business Disruption Plan
BSGC	Business Support Guidelines for Construction
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CSEMF	Community and Stakeholder Engagement Management Framework
CSEMP	Community and Stakeholder Engagement Management Plan
CYP	Cross Yarra Partnership
DTP	Department of Transport and Planning
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMS	Environmental Management System
EPRs	Environmental Performance Requirements
HMP	Heritage Management Plan
HCMTs	High Capacity Metro Trains
IEA	Independent Environmental Auditor
ISO 14001:2015	AS/NZS ISO 14001:2015 Environmental management systems — Requirements with guidance for use
MMRA	Melbourne Metro Rail Authority
MTP or Project	Metro Tunnel Project
OEMP	Operational Environmental Management Plan

TERM / ABBREVIATION	DESCRIPTION
PIO	Where in the course of the audit work, an opportunity has been identified to improve a process or procedure.
RIA	Rail Infrastructure Alliance
RIMG	Residential Impact Mitigation Guidelines
RNA	Rail Network Alliance
RPV	Rail Projects Victoria
RSA	Rail Systems Alliance
SEIP	Site Environmental Implementation Plan
SWMP	Surface Water Management Plan
TPZ	Tree Protection Zone
TMP	Traffic Management Plan
UDMP	Urban Design Management Plan
UDS	Urban Design Strategy
VAGO	Victorian Auditor-General's Office
VAGO Early Works Audit Report	Victorian Auditor-General's Office (6 June 2019) <i>Melbourne Metro Tunnel Project – Phase 1: Early Works</i>
VIDA	Victorian Infrastructure Delivery Authority
WMS	Work Method Statement
WSUD	Water Sensitive Urban Design

1. Executive Summary

The Metro Tunnel Project (MTP) is currently under construction and will create a new end-to-end rail line from Sunbury in the west to Cranbourne/Pakenham in the south-east, with high-capacity trains and five new underground stations. The first works package, the MTP Early Works, which included relocation of services and site preparation works prior to major construction (Main Works) commencing has been completed.

The Victorian Auditor-General's Office (VAGO) undertook an audit of the Early Works Package and published its report Melbourne Metro Tunnel Project – Phase 1: Early Works on 6 June 2019 (VAGO Early Works Audit Report). A key recommendation of the VAGO Early Works Audit Report, regarding its assessment of environmental strategies and risk mitigation, was to develop summaries of the Project's Independent Environmental Auditor (IEA) reports and publish such summaries on the MTP official website. The Project's Environmental Management Framework (EMF) requires an IEA to undertake environmental audits of compliance with the EMF.

This report has been developed to meet the above recommendation of the VAGO Early Works Audit Report and to provide the wider public with information of the Project's environmental performance during the Main Works. This report is specific to the Rail Systems and Rail Infrastructure works packages. All the remaining work on these packages will be delivered by a consortium called the Rail Network Alliance (RNA), comprising John Holland, CPB Contractors, Alstom, AECOM, MTP and Metro Trains.

This report covers alliance package works during the reporting period in 2024, including IEA quarterly audit reports from Q1 2024, Q2 2024 and Q3 2024. A Q4 2024 audit was not undertaken, as there were no site works underway at the time.

The auditing program within the scope of this report identified that, in general, the works were undertaken in accordance with the requirements of the EMF, relevant Environmental Performance Requirements (EPRs) and MTP Incorporated Document. No "Does Not Comply" finding was raised during this reporting period. 1 "Partially Complies" finding was raised; however, it was addressed by RNA in a timely manner and closed out within this reporting period. Therefore, no "Partially Complies" findings remain open at the end of this reporting period. Only 3 "Potential Improvement Opportunities" were identified. The IEA does not require RNA to close out PIOs and therefore no follow-up was required.

The auditing process is designed to lead to continual improvement during projects - this is key to implementing best practice ISO14001 environmental management systems. As such, potentially opportunities for improvement, partially compliances and non-compliances were identified. These were addressed in a timely manner by RNA and where required, closed out within this auditing period.

2. Introduction

2.1 Purpose

Metro Tunnel Project (MTP), previously known as Rail Projects Victoria (RPV), engaged Aurecon Jacobs Mott MacDonald Joint Venture (AJM JV) to prepare a summary report of the IEA audit reports for the MTP Main Works in 2024. This report relates to the Rail Infrastructure & Systems Packages for the Project and summarises findings from the IEA audits undertaken in the same time period. From 2022, all the remaining work on these packages will be delivered by a consortium called the Rail Network Alliance (RNA), comprising John Holland, CPB Contractors, Alstom, AECOM, MTP and Metro Trains.

This request follows a recommendation outlined in the VAGO Early Works Audit Report. That report assessed the environmental strategies and risk mitigation and recommended that the Department of Transport, now Department of Transport and Planning (DTP), should publish summaries of key findings and recommended actions from past and future IEA reports produced for the MTP on the Project's official website. The purpose of this audit summary report is to meet the above recommendation of the VAGO Early Works Audit Report and provide the wider public with information of MTP's Rail Systems and Rail Infrastructure works packages environmental performance during the Main Works Package.

2.2 Project Background

2.2.1 THE METRO TUNNEL PROJECT

The Victorian Government is building the MTP to connect the Sunbury line to the Cranbourne and Pakenham lines through the construction of new twin nine-kilometre rail tunnels and five new underground stations. MTP is transforming Melbourne's rail network into an international-style metro system, boosting the capacity of the rail network to keep pace with Melbourne's growing population and rail patronage.

MTP will provide the foundation for expanding Melbourne's public transport network, helping to ensure Melbourne remains one of the world's most liveable cities now and into the future. MTP will also stimulate significant urban renewal, creating opportunities for new housing, commercial development and jobs in and around the CBD, whilst improving train travel to and from the suburbs.

The infrastructure required for construction of MTP includes:

- Twin nine-kilometre rail tunnels from Kensington to South Yarra, connecting the Sunbury and Cranbourne/Pakenham railway lines through the CBD.
- Rail tunnel portals (entrances/exits) at Kensington and South Yarra.
- New underground stations at Arden, Parkville (under Grattan Street), State Library (at the northern end of Swanston Street), Town Hall (at the southern end of Swanston Street), and Anzac (under the Domain interchange on St Kilda Road). State Library and Town Hall stations will feature direct interchange with the existing Melbourne Central and Flinders Street Stations respectively.
- Train/tram interchange between Anzac Station and the Domain Interchange.
- High-Capacity Signalling to maximise the efficiency of the new fleet of High-Capacity Metro Trains (HCMTs) that will run along the Sunbury, Cranbourne/Pakenham lines and the Metro Tunnel in the future.

Some project elements' nomenclature (e.g. station names) have changed during the delivery of the Project and audit findings may reflect superseded nomenclature, with the updated name provided in brackets.

2.2.2 MTP WORK PACKAGES

MTP is being managed on behalf of the Victorian Government by MTP, formerly known as RPV. MTP forms part of the Victorian Infrastructure Delivery Authority (VIDA) (formerly known as the Major Transport Infrastructure Authority), which is responsible for facilitating the development and delivery of the biggest transport infrastructure program in Victorian history. Figure 2-1 shows a broad schematic plan for the principal components of MTP.

Construction of MTP is being delivered by MTP in partnerships with contracted Delivery Partners.

TABLE 2-1 MTP WORKS PACKAGES

PACKAGE	DESCRIPTION
Early Works	The Early Works Package including three sub-packages of works, each respectively was delivered by a Managing Contractor, Yarra Trams and Utility Service Providers.
Main Works	<p>The Tunnels and Stations Works Package, being delivered by Cross Yarra Partnership (CYP).</p> <p>Rail Infrastructure & Systems Packages, remaining work being delivered by a consortium called the Rail Network Alliance (RNA), comprising John Holland, CPB Contractors, Alstom, AECOM, MTP and Metro Trains.</p>

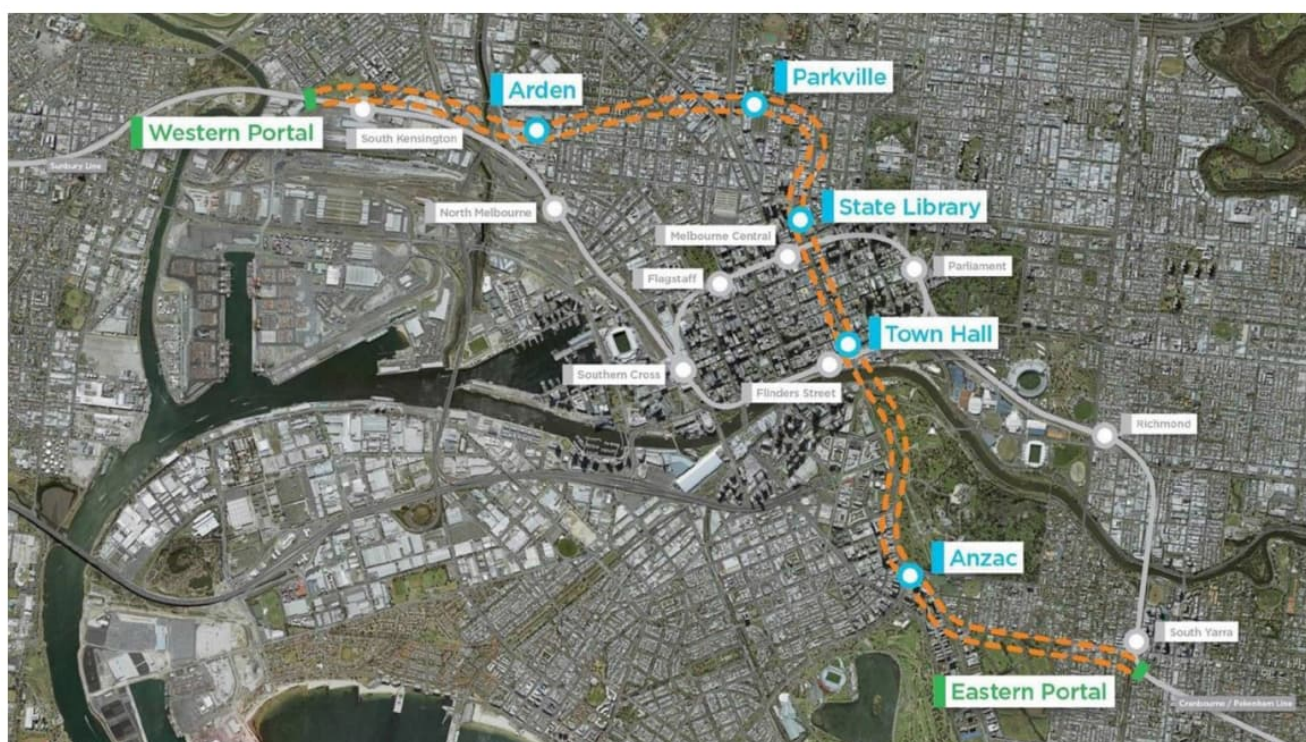


FIGURE 2-1 MTP SCHEMATIC PLAN

2.3 Scope

This report summarises environmental audits conducted as part of the MTP Main Works being delivered under the Rail Infrastructure Works Package. The report summarises the IEA audits undertaken in 2024, outlined in Table 2.2. The report covers all works for the Rail Systems and Rail Infrastructure Works Packages of MTP conducted under the Planning Scheme Amendment (GC82) and associated Incorporated Document approved

and published in the Government Gazette on 26 June 2018 and the associated Melbourne Metro EMF. Subsequent summary audit reporting will be completed on an annual basis.

TABLE 2-2 IEA AUDIT REPORTS IN SCOPE

PACKAGE	SCOPE	RELEVANT IEA REPORTS IN SCOPE
GC82 - Rail Systems and Infrastructure Works, being delivered by Rail Network Alliance (RNA)	Publish key findings for IEA Audit reports from Q1 2024 until Q4 2024	KPMG Audit Reports: Q1 2024, Q2 2024 and Q3 2024. A Q4 2024 audit was not undertaken, as no site works were being undertaken in Q4 audit period. Audits will re-commence in Q1 2025.

From 2022, RIA and RSA integrated to form a consolidated alliance known as the 'Rail Network Alliance' (RNA), to deliver the remaining infrastructure and systems works Metro Tunnel need for operation. The following Packages are excluded from this report:

- Works carried out from 2018 to 2022 have been addressed in separated IEA summary reports which have been completed and have been published on MTP's website.
- Tunnels and Stations Works Package, being delivered by CYP; are covered by a separate report.
- Rail Infrastructure and Rail Systems Planning Scheme Amendments works being carried out under Planning Scheme Amendment (PSA) GC96.

3. Environmental Management

3.1 Environmental Governance Framework

An Environment Effects Statement (EES) has been prepared for the MTP and, following the statutory EES process, an Incorporated Document was approved by the Minister for Planning, containing compliance obligations which must be achieved by the Delivery Partners.

Each Delivery Partner is required to:

- Comply with the requirements of the Incorporated Document under the Planning Scheme Amendment (GC82) which was approved and published in the Government Gazette on 26 June 2018.
- Comply with the Environmental Management Framework (EMF) that has been approved by the Minister for Planning and is published on the MTP website. Among other things, the EMF includes the Environmental Performance Requirements (EPRs), the Residential Impact Mitigation Guidelines (RIMG) and the Business Support Guidelines for Construction (BSGC).
- Comply with the EPRs, which includes a requirement to prepare plans to document the approach to compliance.
- Develop, implement and maintain a project-specific Environmental Management System (EMS) that meets the requirements of ISO14001:2015 Environmental Management Systems, Construction Environmental Management Plan (CEMP) and Site Environmental Implementation Plans (SEIPs) for the design and construction phases, where applicable.
- Develop a Community and Stakeholder Engagement Management Plan (CSEMP) consistent with the MTP CSEMP.

The governance framework and relevant roles and responsibilities for MTP are set out in the EMF and are included in Section 3 of this Summary Report.

The governance framework for MTP is presented in Figure 3-1.

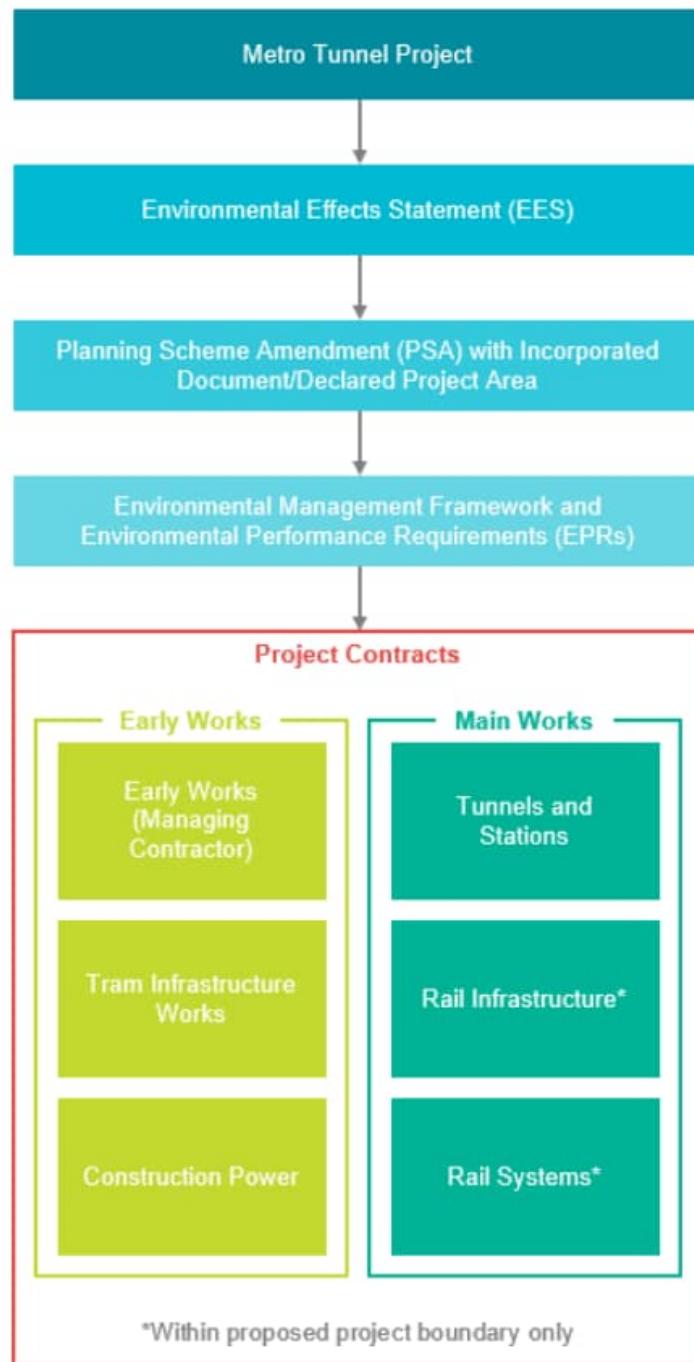


FIGURE 3-1 GOVERNANCE FRAMEWORK

3.1.1 ENVIRONMENTAL MANAGEMENT FRAMEWORK

The Incorporated Document describes the requirements of the EMF. The main elements of the EMF for the design and construction phase are:

- Applicable legislative requirements and approvals.
- EPRs, which address matters set out in the Incorporated Document and identified through the EES.
- The RIMG and the BSGC.
- A CEMP, together with subordinate document including SEIPs, EMS and other plans identified in the Incorporated Document and EMF.

The EMF documentation is summarised in Figure 3-2.

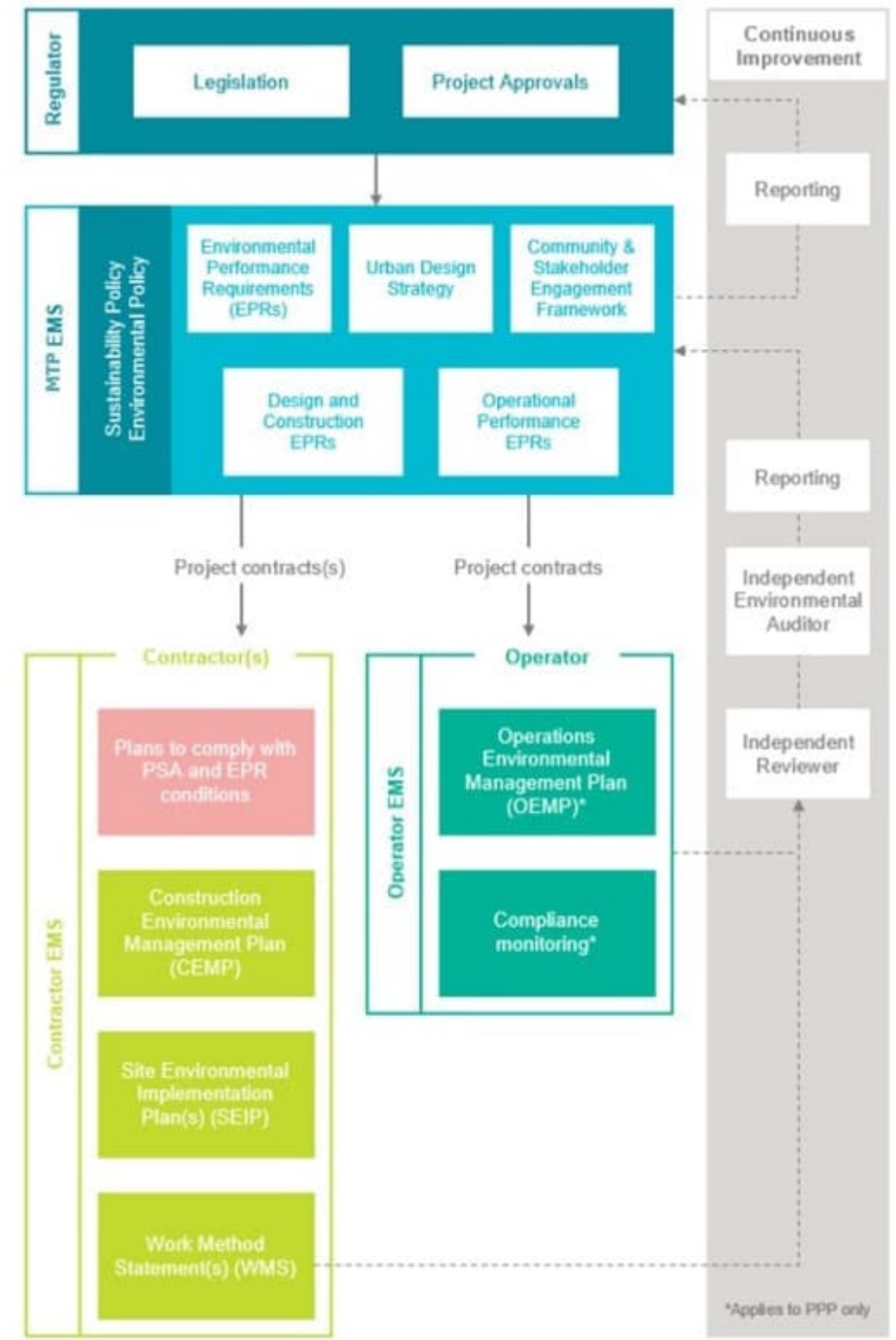


FIGURE 3-2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

The EMF requires that the Delivery Partners develop and implement an EMS certified to ISO 14001:2015 and consistent with relevant legislation, policy and guidelines and MTP's Environmental Policy.

The EMF provides the governance framework to manage environmental aspects identified through the EES process, including the Minister for Planning's assessment, for the design, construction and operational phases of the MTP.

3.1.2 ENVIRONMENTAL PERFORMANCE REQUIREMENTS

EPRs have been developed through the EES and associated consultation processes, and to reflect the Minister for Planning's assessment of the EES and the requirements of the Incorporated Document.

MTP is required to be delivered in accordance with approved EPRs that define the project-wide environmental outcomes that must be achieved during design, construction and operation of MTP. This performance-based approach allows for a delivery model with sufficient flexibility to encourage innovation by the private sector to determine how any recommended EPRs would be achieved.

The EES presented a risk-based assessment of environmental effects of the MTP, in accordance with the EES Scoping Requirements. Potential mitigation measures were typically included in the EES as examples of how an environmental effect could be mitigated and to illustrate how an EPR could be implemented. However, the EES generally did not mandate or commit to a particular mitigation or management outcome. In the same manner, the EPRs do not typically mandate or require a particular mitigation or management solution. Instead, the EPRs are implemented by applying an assessment of the nature and extent of the relevant environmental effects, and the most practicable means of mitigating and managing those effects. This method is used so that the management and mitigation measures implemented are proportional to the effect they are designed to address and achieve the outcome prescribed by the EPR.

The Incorporated Document requires that the MTP is constructed and operated in accordance with the EPRs approved by the Minister for Planning. Each Delivery Partner is to comply with the EPRs and prepare necessary plans prior to commencement of their scope of work to document the approach to compliance with each EPR.

3.1.3 ASSOCIATED MANAGEMENT PLANS

MTP together with the Delivery Partners (as relevant) prepared plans to comply with the approval requirements in the Incorporated Document. MTP and the Delivery Partners developed and implemented these management plans and programs in accordance with the processes detailed in the EMF.

3.2 Roles and Responsibilities

3.2.1 METRO TUNNEL PROJECT

MTP, on behalf of the Victorian Government, is responsible for delivering MTP in line with the requirements and objectives of DTP and the Victorian Government. MTP forms part of the VIDA (formerly known as the Major Transport Infrastructure Authority), which is responsible for facilitating the development and delivery of the biggest transport infrastructure program in Victorian history.

The key roles and responsibilities of MTP for the MTP are set out in the EMF and include:

- Obtain applicable principal statutory approvals including the Planning Scheme Amendment (PSA), Cultural Heritage Management Plan (CHMP) and some heritage permits, where it is more appropriate for MTP to seek these consents.
- Establish the EMF, including the RIMG and the BSGC for approval by the Minister for Planning as required by the Incorporated Document.
- Establish the Urban Design Strategy (UDS) and the CSEMF for approval by the Minister for Planning, as required by the Incorporated Document and EPRs.
- Develop and implement the MTP EMS, in accordance with ISO 14001:2015.
- Monitor compliance with the EPRs across all Project Contracts and comply with the EPRs applicable to MTP.
- Together with each Delivery Partner for each of the Project Contracts, develop and submit the requisite plans to comply with the Incorporated Document and the EMF.

- Review and approve contract documentation for each Project Contract in accordance with the EMF, including the CEMPs, SEIPs, Transport Management Plans, Business Disruption Plans (BDPs) and Construction Noise and Vibration Management Plans (CNVMP) as required by the Incorporated Document.
- Review the CSEMP for each Project Contract.
- Prior to commencement of work, verify that the Delivery Partner has complied with the relevant EPRs.
- Review the Delivery Partner's performance against the approved EPRs and take corrective action as necessary.
- Commission the Independent Environmental Auditor to determine Delivery Partner compliance with the EMF, EPRs and relevant Delivery Partner Management.

3.2.2 DELIVERY PARTNERS

Construction of MTP is being delivered by MTP on behalf of the Victorian Government in partnerships with contracted Delivery Partners. The key roles and responsibilities of each Delivery Partner for the MTP are set out in the EMF and the contractual obligations and include:

- Comply with the EMF (including the EPRs, RIMG, BSGC and CSEMF), legislative and approval requirements.
- Obtain any additional permits from regulatory authorities (other than the approvals that would be obtained by or jointly with MTP).
- Develop and implement a project specific EMS or apply their existing EMS to the specific activities for the MTP, that is certified to ISO 14001:2015.
- Prepare a CEMP, SEIPs and associated work method statements (WMS), and other plans required by the Incorporated Document, EPRs or Project Contracts.
- Develop a CSEMP consistent with MTP's CSEMF approved by the Minister for Planning in accordance with EPR SC3.
- Provide adequate resources to establish, implement, maintain and improve the CEMP, SEIPs and the EMS.
- Implement and maintain compliance with the EPRs.
- Undertake environmental audits to confirm compliance with the EMF, EPRs and plans required by the Incorporated Document.
- Prior to commencement of work, ensure that all sub-contractors have complied with the relevant EPRs, CEMP and plans required to comply with the EPRs and Incorporated Document, where relevant.
- Review of sub-contractor's performance against the EPRs and CEMP and take corrective action as necessary.

3.2.3 INDEPENDENT ENVIRONMENTAL AUDITOR

The IEA undertakes environmental audits of compliance with plans required to comply with the EPRs and Incorporated Document prior to implementation, as well as during project activities, to verify compliance with the EMF, EPRs, environmental management plans and approval requirements. This also includes investigations into trends in complaints, by topic or on a random basis.

The key roles and responsibilities of the IEA during the Main Works Packages, as specified in the EMF, are:

- Prior to commencement of work, verify that the Delivery Partner has complied with the relevant EPRs, the EMF and the Incorporated Document, by reviewing management plans required by the EPRs.
- Conduct audits of the Delivery Partner's works to assess compliance with the CEMP, EMF, EPRs and plans required by the EPRs and Incorporated Document.

- Prepare audit reports containing the results of audits.
- Review complaints which may highlight instances of non-conformance with applicable EPRs.

4. Conduct of Audits

4.1 IEA Audit Requirements

Audits of each Delivery Partner's CEMP, sub-plans and SEIPs were required prior to works commencing to Confirm compliance with ISO 14001:2015, the EMF, relevant EPRs and Incorporated Document. Site audits were scheduled on a quarterly basis through the delivery of the Main Works Package and considered:

- The timing of works.
- The nature of the works including consideration of the level of associated risk.
- Incident investigation outcomes.
- Complaints received, particularly if related to EPRs and indicate instances of non-conformances.
- Previous audit outcomes.
- Management review outcomes: upon the completion of each audit, an audit report detailing all the findings was submitted to MTP.

4.2 IEA Audit Methodology

4.2.1 AUDIT OVERVIEW

The MTP EMF outlines the IEA responsibilities, including:

- Prior to commencement of work, verify that the contractor has complied with the relevant EPRs, the EMF and the Incorporated Document.
- Conduct audits of the contractor's works to assess compliance with the CEMP, EMF, EPRs and plans required by the EPRs and Incorporated Document.
- Prepare a six-monthly report summarising the Contractor's compliance with the EMF and provide to MTP and the Delivery Partner.
- Prepare audit reports containing the results of audits.
- Review complaints which may highlight instances of non-conformance with applicable EPRs.

4.2.2 AUDIT PROGRAM

Audits of the Delivery Partner's CEMP, sub-plans and SEIPs involved a review of each document to assess compliance with ISO 14001:2015, the EMF, relevant EPRs and Incorporated Document. During site inspections, compliance was assessed through observation of project activities, interviews and review of relevant environmental records.

The audit schedule was developed so that the EPRs considered in each audit would be relevant to the Construction activities at that time. Prior to each audit, key environmental aspects were identified in consultation with MTP and RNA. The key environmental aspects were decided based on these discussions, taking into consideration previous findings and any relevant stakeholder engagement.

These key environmental aspects formed the scope for each environmental audit and broadly covered the documentation listed in Section 4.2.1.1 and the works listed in Section 4.2.1.2 and 4.2.2.3. During the course of the audit program KPMG followed up the status of findings of the previous reports until each finding was satisfied and closed.

4.2.2.1 Documentation

The MTP EMF required RNA to produce the following management plans and environmental documentation:

- CEMP and associated sub plans
- SEIP
- Air Quality Management Plan
- Ecology Management Plan
- Heritage Management Plan
- Surface Water Management Plan
- Spoil Management Plan
- Monitoring Management Plan
- Construction Noise & Vibration Management Plan
- Health and Safety Management Plan
- Tree Management Plan
- Traffic Management Plans
- Urban Design Management Plan
- Urban Ecology Management Plan
- Sustainability Management Plan
- BDP
- CSEMP
- Ground Movement Management Plan
- EMS Manual
- Other documentation (as required).

4.2.2.2 Works

The RNA works under GC82 are being undertaken in three key construction precincts: Western (Tunnel Entrance) Portal, Eastern (Tunnel Entrance) Portal and Western Turnback. Key activities being carried out by RNA include:

- Construction of concrete structures including approach, decline and cut and cover
- Structural steel works
- Services works, including power and drainage
- Road construction
- Landscaping
- Traffic management
- Civil works to support the tunnel entrance construction
- Combined services route installation and relocation
- Signalling equipment installation
- Overhead wiring works

- Track works
- Construction of a third station platform West Footscray platform.

4.2.2.3 Complaints

Complaints are addressed during the course of the IEA Audits through auditing EPR SC4 Communications and Stakeholder Relations and how the delivery partner is implementing the complaints management process. Findings against this process may result in non-conformance if complaints are not being appropriately managed. Where there are no specific IEA findings against under the CEMP, complaints are being managed in accordance with the relevant plans.

4.2.3 AUDIT CLASSIFICATIONS

The IEA (KPMG) used different audit classifications during the relevant period that were attributable to the type of audit being carried out.

- Pre-commencement audits were documentation-based desktop audits, testing plans, sub-plans and other relevant documentation against selected EPRs. A compliance-based classification was agreed as the most suitable means of rating the findings.
- Implementation Audits were initially agreed to be based on risk levels to consider the relative potential impacts of non-compliances.

However, after initial Implementation Audits had been completed, it was decided that audit findings would be better suited as a compliance-based classification, which also better aligned to the purpose of the audits. This also allowed for consistency with the pre-commencement desktop audits and a direct comparison of findings.

The Audits from the 2022 period were all Implementation Audits and followed the compliance-based classification system seen in Table 4.1.

TABLE 4-1 AUDIT CLASSIFICATIONS

FINDING	DESCRIPTION
Complies (C)	The response fully satisfies the requirement (being a requirement of a framework, standard or other guidance used to set the performance standard of the project)
Does Not Comply (DNC)	The response does not satisfy the requirement.
Partially complies (PC)	The response partially satisfies the requirement; is in progress to satisfy the requirement or is part of a demonstrated Sub-Plan or plan to satisfy the requirement.
Potential Improvement Opportunity (PIO)	Where in the course of the audit work, an opportunity has been identified to improve a process or procedure. A PIO is an opportunity to improve upon a process or procedure. It does not represent a non-compliance and therefore is not required to be addressed to achieve compliance. For this reason, there is no follow up required to close out PIOs.

5. Audit Findings Summary

5.1 Implementation Audit Q1 2024

5.1.1 AUDIT SCOPE

The Implementation Audit (GC82) conducted in Q1 2024 reviewed the compliance of RNA works against EPRs at the Eastern Portal, Western Portal, Western Turnback. This included confirmation that the RNA's management plans (including the CEMP and associated sub-management plans) complied with requirements.

EPRs reviewed within the scope of the Implementation Audit Q1 2024 under GC82 were:

- Environmental Management Framework: EMF1 and EMF2
- Groundwater: GW1, GW3, GW4 and GW5
- Social and Community: SC1, SC4, SC6 and SC10

The audit scope also incorporated the investigation of any open previous findings to update their status and close where appropriate.

5.1.1.1 Audit Findings

This section summarises the IEA findings relevant to the Q1 2024 IEA Report.

MTP requires an implementation audit to be conducted of:

- The GC82 Rail Infrastructure works package as required under the Metro Tunnel Environmental Management Framework (MT EMF).

MTP engaged the services of the Independent Environmental Auditor (IEA) to test (on a sample basis) that the Rail Network Alliance (RNA) is meeting selected requirements of the GC82 MT EMF.

RNA is currently delivering works in the following areas:

- GC82 Western Portal (WP);
- GC82 Eastern Portal (EP);
- GC82 Western Turnback (WT);

The scope of the works covered by this Q1 audit includes:

- An implementation audit of the environmental performance of remaining works at Eastern Portal, Western Portal, Western Turnback, Western Corridor and Eastern Corridor.
- Follow up and close out of any outstanding findings from the Q4 2023 audit and any other open audit findings.

The Q1 audit involved conducting a desktop assessment of documentation provided by RNA, and in person interviews with relevant RNA personnel (refer to Appendix 2 for the detailed audit scope and Appendix 5 for the list of interviewees). All previous findings are closed. See Appendix 3.

Overall, the Q1 audit identified no findings or potential improvement opportunities, however positive observations are noted.

5.1.1.2 Does Not Comply

No findings raised as "Does Not Comply" during this audit.

5.1.1.3 Partially Complies

No findings raised as "Partially Complies" during this audit.

5.1.1.4 Potential Improvement Opportunity

No findings raised as “Potential Improvement Opportunities” during this audit. However, positive observations were noted.

5.2 Implementation Audit Q2 2024

5.2.1 AUDIT SCOPE

The Implementation Audit conducted in Q2 2024 reviewed the compliance of RNA works against EPRs at the Eastern Portal, Western Portal and Eastern Corridor. EPRs reviewed within the scope of the Implementation Audit Q2 2024 under GC82 were:

- Aboriginal Heritage: AH1
- Air Quality: AQ2 and AQ3
- Business: B2
- Contaminated Land and Spoil Management: C1, C2 and C3
- Cultural Heritage: CH1
- Noise and Vibration: NV1, NV11 and NV17

The audit scope also incorporated the investigation of any open previous findings to update their status and close where appropriate.

5.2.1.1 Audit Findings

This section summarises the IEA findings relevant to the Q2 2024 IEA Report.

MTP requires an implementation audit to be conducted of:

- The GC82 Rail Infrastructure works package as required under the Metro Tunnel Environmental Management Framework (MT EMF).

MTP engaged the services of the Independent Environmental Auditor (IEA) to test RNA’s environmental performance in relation to selected requirements of the GC82 MTP EMF.

RNA is currently delivering works in the following areas:

- GC82 Western Portal (WP);
- GC82 Eastern Portal (EP); and
- GC82 Western Turnback (WT);

The scope of the works covered by this Q2 audit includes:

- An implementation audit of the environmental performance of remaining works at the Eastern Portal, Western Portal and Western Turnback.
- Follow up and close out of any outstanding findings from the Q1 2024 audit and any other open audit findings.

The Q2 audit involved conducting a desktop assessment of documentation provided by RNA, and in person interviews with relevant RNA personnel (refer to *Appendix 2* for the detailed audit scope and *Appendix 5* for the list of interviewees). All previous findings are closed. See Appendix 3.

- Overall, the Q2 audit identified one ‘Partially Complies’ finding, and one ‘Potential Improvement Opportunity’.

5.2.1.2 Does not Comply

No findings raised as “Does Not Comply” during this audit.

5.2.1.3 Partially Complies

The Q2 audit identified one finding as “Partially Complies” during this audit.

The GC82 Site Environmental Implementation Plan (SEIP) includes the following key management measure, with the supervisor listed as the responsible party: “*Separation of known contaminated material and natural material is to occur as far as practicable.*”

The IEA determined that stockpiled soils were not segregated in accordance with the SIEP and “as far as practicable” by classification type. It was observed Category C material not being segregated from the moment of excavation onwards and/or stored in the same area as clean fill. This resulted in additional cost associated with increased quantities of spoil defaulting to a more contaminated spoil classification, which also reduced the amount of clean fill that was able to be re-used. Since the requirement to segregate spoil based on classification type has not been implemented in accordance with the SMP on this occasion, RNA have partially complied with the requirements of EPR C1. This presents risks of:

- insufficient controls and oversight to identify and reduce spoil disposal, contamination and remediation risks at the laydown yard; and
- potential reputational damage stemming from public rail works being undertaken without an appropriately implemented SMP.

In the Q3 Audit the IEA closed the audit finding due to RNA corrective actions:

- RNA indicated that stockpile has been removed offsite and no spoil has or will be stockpiled at the location for the remainder of works.
- RNA conducted a Waste Soil and Spoil Management Toolbox that addressed Waste Soil & Spoil Risks.

5.2.1.4 Potential Improvement Opportunity

The Q2 audit identified the following one potential improvement opportunities (PIO).

RNA’s obligations for managing business disruption within GC82 via the preparation and implementation of a Business Disruption Plan, consistent with the Community and Stakeholder Engagement Management Plan (CSEMP), have been confirmed and documented with MTPO.

The IEA determined that there was an opportunity for RNA and MTP to conduct a final survey of affected businesses to distil learnings and opportunities for improvement to further demonstrate continued improvement and lessons learned for future infrastructure related business interactions.

The IEA does not require RNA to close-out PIOs.

5.3 Implementation Audit Q3 2024

5.3.1 AUDIT SCOPE

The Implementation Audit conducted in Q3 2024 reviewed the compliance of RNA works against EPRs at the Eastern Portal, Western Portal and Western Turnback. This included confirmation that the RNA’s management plans (including the CEMP and associated sub-management plans) complied with requirements.

EPRs reviewed within the scope of the Implementation Audit Q3 2024 under GC82 were:

- Air Quality: AQ1
- Environmental Management Framework: EMF2
- Ground movement: GM2 and GM3
- Landscape and Visual: LV1
- Noise and Vibration: NV1, NV2, NV18, NV19, NV20 and NV21

The audit scope also incorporated the investigation of any open previous findings to update their status and close where appropriate.

5.3.1.1 Audit Findings

MTP requires an implementation audit to be conducted of the GC82 Rail Infrastructure works package as required under the Metro Tunnel Environmental Management Framework (MT EMF).

MTP engaged the services of the Independent Environmental Auditor (IEA) to test the Rail Network Alliance's (RNA) environmental performance in relation to selected requirements of the GC82 MT EMF.

is currently delivering works in the following areas¹:

- GC82 Western Portal (WP);
- GC82 Eastern Portal (EP); and
- GC82 Western Turnback (WT).

The scope of the works covered by this Q3 GC82 audit includes:

- An implementation audit of the environmental performance of remaining works at Eastern Portal, Western Portal, Western Turnback; and
- Follow up and close out of any outstanding findings from the Q2 2024 audit and any other open audit findings.

The Q3 audit involved conducting a desktop assessment of documentation provided by RNA, and remote interviews with relevant RNA personnel.

Overall, the Q3 audit identified two potential improvement opportunities and two positive observations.

5.3.1.2 Does Not Comply

No findings raised as "Does Not Comply" during this audit.

5.3.1.3 Partially Complies

No findings raised as "Partially Complies" during this audit.

5.3.1.4 Potential Improvement Opportunity

The Q2 audit identified the following two (2) potential improvement opportunities (PIO):

PIO – EMF2

There is an opportunity for RNA to conduct a meeting prior to the commencement of works associated with the upcoming Kensington Glue Works demolition works to ensure that MTP are promptly informed of RNA's project updates and their associated significant environmental risk areas, for inclusion in upcoming implementation audits.

The IEA does not require RNA to close-out PIOs, and therefore no follow-up was required.

PIO – GM3

The majority of post-condition surveys have been completed, with the exception of properties that will be impacted as part of the upcoming Kensington Glue Works demolition works, planned to commence between October and November 2024. IEA determined that RNA's engagement with MTP regarding the status of post-condition surveys is limited to instances where these surveys are tested as part of compliance audits. There is an opportunity for RNA to provide regular updates to MTP on the status of post-condition surveys.

¹ With reference to PO#2, based on discussions with RNA during the remote interview held on Thursday 15/08/24, the IEA understands that the majority of construction phase-related works have been completed and most work areas have been handed over to transition into the operational phase.

The IEA does not require RNA to close-out PIOs, and therefore no follow-up was required.

6. Conclusions

The auditing programme identified that, in general, the works being delivered by RNA and summarised within this report was undertaken in accordance with the requirements of EMF, relevant EPRs and the Incorporated Document. The auditing process is designed to lead to continual improvement during projects - this is key to implementing best practice ISO14001 environmental management systems.

In the previous IEA summary report (MMR-AJM-PWAA-RP-NN-005172) for 2023 there was no findings of greater environmental significance / risk (i.e. Does Not Comply findings). This trend continued in this reporting period with no “Does Not Comply” finding being raised in this reporting period.

In summary, RNA were generally compliant with their environmental obligations under the requirements of GC82. RNA has responded in order to address any issues or environmental harm. The 1 “Partially Complies” finding that was raised during this reporting period was addressed by RNA in a timely manner and closed out within the same reporting period by RNA corrective actions. Therefore, no “Partially Complies” findings remain open at the end of this reporting period. This highlights the project’s overall improvements in compliance and the continued commitment to the continual improvement principle. 3 “Potential Improvement Opportunities” were identified, however the IEA does not require RNA to close out PIOs and therefore no follow-up was required.

This summary report relates to the Main Works Package of the MTP RNA Works Package from start of 2024 until the end of 2024. Further summaries of key findings and recommended actions from future IEA reports produced for the remaining works packages of the MTP will be prepared and published on the project's official website.



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