

1 May 2025

North East Link Program
Level 13, 121 Exhibition Street
Melbourne VIC 3000

Via email:

North East Link Early Works – Independent Environmental Auditor

Dear

Nation Partners Pty Ltd (Nation Partners) is the Independent Environmental Auditor (IEA) for the North East Link Early Works (NELEW), part of the North East Link Program (NELP or Program), pursuant to the Environmental Management Framework (EMF) approved by the Minister for Planning. As the scope of early works is now complete, the purpose of this letter is to document and confirm that the responsibilities of Nation Partners as the IEA for the NELEW have been discharged.

The status of the responsibilities of the Independent Environmental Auditor, as defined by the EMF, are outlined in Table 1.

Table 1: Status of the responsibilities of the Independent Environmental Auditor

Responsibility under the EMF	Status
Develop an audit plan, including a schedule, and audit scopes to the satisfaction of NELP for each Project contract.	Complete <ul style="list-style-type: none"> An audit plan for the NELEW was developed and implemented to the satisfaction of NELP.
Conduct audits of contractor works to assess compliance with the EMF, relevant EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, OEMP, other plans as required by the EPRs and conditions of Project approvals.	<ul style="list-style-type: none"> Audits of the NELEW were undertaken of active sites, quarterly from August 2020 to November 2024. Audits were conducted in accordance with <i>AS/NZS ISO 19011 Guidelines for auditing management systems</i> by auditors that were independent of the activity being audited.
Prepare audit reports containing the results of each audit and provide to NELP and the contractor.	<ul style="list-style-type: none"> Each EPR triggered by the NELEW was audited at least once every 12 months. Nation Partners' risk-based approach (consistent with <i>AS/NZS ISO 19011:2019</i>) meant that some EPRs were audited multiple times in a 12-month period.
Review environmental complaints data as part of audits to identify possible instances of non-conformance with the EMF, EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, OEMP, other plans required by the EPRs, conditions of Project approvals and environmental requirements of the Project contract.	<ul style="list-style-type: none"> The scope of each quarterly audit of the NELEW included, among other things, environmental complaints data. Each quarterly audit was documented and provided to NELP and relevant NELEW contractor.
Review the adequacy of and verify that the contractors' environmental management and design documentation, Environmental Strategy, Urban Design and Landscape Plans, CEMP, WEMPs, OEMP and other documents as set out in Table 6.2 comply with the Project contract including the EMF and EPRs, conditions of Project approvals, and are in general accordance with the approved Urban Design Strategy. This includes verifying that engagement has been	Complete <p>All NELEW contractors' environmental management documentation required by the EMF that was referred to Nation Partners was reviewed, and verified when compliant (including relative to engagement required) with the EMF. This was documented in the IEAs verification statement and review report relevant to each document.</p>

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Responsibility under the EMF	Status
undertaken to inform the plans as required by the EMF, EPRs and Urban Design Strategy or by NELP.	
Prepare a six-monthly report, as per Section 7.2, summarising the contractors' compliance with the EMF and EPRs and provide to NELP and the contractor.	<p>Complete</p> <p>6 monthly reports on the NELEW were developed and provided to NELP and the relevant contractor(s).</p> <p>The summary reports summarised NELEW audit activities undertaken during the relevant reporting period, audit findings, the status of actions taken to address previous audit findings and the contractors' compliance with the EMF and EPRs.</p> <p>The final NELEW 6 monthly report, for the period August 2024 to January 2025, was completed on 25 March 2025.</p>

There are two EPRs from NELEW that trigger ongoing requirements extending beyond the date of this letter and responsibility for IEA assessment of compliance with these items has been novated, requiring assessment by another NELP IEA to ensure compliance. These EPRs are:

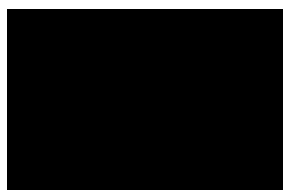
- EPR AR2: *Trees subject to protection must be monitored for a three-year period following completion of construction works in that location to assess ongoing viability, with maintenance or replacement of stressed or damaged specimens to be undertaken; and*
- EPR SCC1: *North East Link Project must set sustainability targets and specify ratings to be achieved under the Infrastructure Sustainability Council of Australia's Infrastructure Sustainability Rating Tool. Contractors must develop and implement a Sustainability Management Plan that contains measures to meet, as a minimum, the sustainability targets and specified ratings.*

Whilst the NELEW IEA does not have responsibility for assessing compliance with these EPRs, as at the date of this letter Nation Partners:

- Is satisfied that there are adequate processes and systems in place to ensure that NELP understands which trees are subject to protection and that monitoring of these trees can be undertaken for a three year period following completion of the NELEW; and
- Recognises that the sustainability targets and specified ratings apply to the NELP, and any shortfall of the sustainability targets noted from the NELEW are unlikely to be material to achieving the sustainability targets for the NELP program. Nation Partners considers NELP to have adequate information from the NELEW to understand the projects trajectory for compliance with the sustainability targets and specified ratings.

If you have any questions, or require any clarification, regarding the information contained in this letter, please contact me on [REDACTED]. We look forward to your written concurrence that all NELEW IEA responsibilities have been discharged.

Sincerely,



Director

I acknowledge the Traditional Custodians of the land on which I work and live, and recognise their continuing connection to land, water, and community. I pay my respects to Elders past, present and emerging.