



North East Link Program - Freeway
Packages Independent Environmental
Auditor

Six-Monthly

Summary Report:

November 2023 – April 2024

Report to the Minister for Planning

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Document Approval

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Inherent Limitations

This report has been prepared as outlined in the Scope and Approach Section and provides a summary of KPMG’s work undertaken over the period November 2023 to April 2024 inclusive. KPMG’s full detailed findings are contained in respective reports prepared across this period. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirety and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the Major Road Projects Victoria (MRPV), the M80 Ring Road Alliance (M80RRA) and the Eastern Freeway Burke to Tram Road Alliance (EFBTA), consulted as part of the process. KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form. The findings in this report have been formed on the above basis.

Third Party Reliance

This report is solely for the purpose set out in the Scope and Approach Section and for MRPV’s and the Minister for Planning’s information, and is not to be used for any other purpose or distributed to any other party without KPMG’s prior written consent. This report has been prepared at the request of the MRPV, a division of the Victorian Infrastructure Delivery Authority (VIDA) (an administrative office in relation to the Department of Transport and Planning), in accordance with the terms of KPMG’s engagement contract dated 27 June 2023. Other than our responsibility to MRPV and the Minister for Planning, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party’s sole responsibility.

Executive Summary

Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that Major Road Projects Victoria (MRPV), which is delivering the NEL Program (NELP) on behalf of the State, provides Six-Monthly Summary Reports as to compliance with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning. This Report presents the NELP Freeway Packages Independent Environmental Auditor (FIEA) Six-Monthly Summary Report covering the period November 2023 to April 2024 inclusive (herein referred to as the Reporting Period).

The NEL connects the Eastern Freeway at Bulleen Road, Bulleen, 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. NEL is being delivered as a Program comprising several packages:

- NEL Enabling Works (NELEW), which comprised relocation of services to enable the Program and delivery of the Bulleen Park and Ride;
- Central Package, comprising the construction of twin road tunnels beneath the Yarra River; and,
- Four (4) Freeway Packages of works, which are predominantly the subject of this Report.

This Report summarises the FIEA audit activities undertaken during the Reporting Period, audit findings, the status of actions taken to address previous audit findings, and auditees compliance with the EMF and EPRs, and covers audits conducted by the FIEA on activities associated with:

- The Alliances delivering the NELP Freeway Packages (restricted to the North and South Packages for the Reporting Period). The North Package is being delivered by the M80 Ring Road Alliance (M80RRA) and the South Package by the Eastern Freeway Burke to Tram Alliance (EFBTA);
- 'Project-wide' EPRs for which MRPV is fully or partially responsible; and,
- Relocation of the Indara telecommunications tower at Thompsons Road, Bulleen.

This Report has been prepared by KPMG, which has been engaged by MRPV as the FIEA in accordance with Section 2 of the EMF.

For the purposes of the FIEA services and as defined in the EMF, 'audit' refers to assessment of compliance with the EMF, relevant Environmental Performance Requirements (EPRs), Environmental Strategy, Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), other plans as required by the EPRs and conditions of Program approvals, adopting a risk-based

approach (founded in the guiding principles of *AS/NZS ISO 19011:2019 Guidelines for auditing management systems*). Any references to 'audit' in this Report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this Report.

The EPRs comprise a suite of 110 performance-based environmental standards and outcomes across 17 topics, intended to minimise impacts and the risk of harm to human health and the environment to within reasonable limits having regard to contextual factors and the practical delivery of the Program. Compliance with the EMF and EPRs is mandated by the terms of the Incorporated Document, which require the use and development of the Program to be in accordance with the EMF and EPRs approved by the Minister for Planning.

Each Freeway Package Alliances' activities and scope of works must comply with all relevant EPRs. Not all EPRs are applicable to the Freeway Packages and to every stage of the Freeway Packages works. In addition, not all the EPRs are the responsibility of each Freeway Package Alliance, with MRPV being fully or partially responsible for compliance with specific EPRs.

Audit Activities

To assess compliance of the Freeway Package Program with the EMF, relevant EPRs, Environmental Strategies, Construction Environment Management Plans (CEMPs), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), other plans as required by the EPRs and conditions of Program approvals, the FIEA has implemented a Compliance Audit Program comprising two (2) types of compliance audit, to be conducted per Freeway Package. These comprise an EMF and EPR Compliance Audit and an Environmental Performance Compliance Audit, conducted quarterly and monthly respectively during the Reporting Period.

The Compliance Audit Program methodology has been developed applying a risk-based approach, and with reference to the principles described in *AS/NZS ISO 19011:2019*. Given a risk-based approach is applied to the Compliance Audit Program, each audit does not involve an exhaustive assessment against every requirement of the EMF and every EPR. Whilst higher-risk activities will be audited more frequently, the Compliance Audit Program will be conducted to assess compliance with all relevant EPRs at least once every 12 months.

10 Compliance Audits were conducted by the FIEA during the Reporting Period as summarised in Table E.1.

Table E.1: FIEA Compliance Audits conducted in Reporting Period

Package	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	No. of EPRs assessed during Reporting Period
North Package (M80RRA)	Monthly Env Perf Audit	-	-	Qtly EMF and EPR Compliance Audit	Monthly Env Perf Audit	Monthly Env Perf Audit	69 of the 94 relevant/triggered EPRs
South Package (EFBTA)	-	Monthly Env Perf Audit	-	Qtly EMF and EPR Compliance Audit	Monthly Env Perf Audit	Monthly Env Perf Audit	56 of the 87 relevant/triggered EPRs
East Package (TBC)¹	-	-	-	-	-	-	-
West Package (TBC)²	-	-	-	-	-	-	-
Project-wide EPRs (MRPV)	EPR Compliance Audit	-	-	-	-	-	All 13 relevant/triggered EPRs
Indara Tower Relocation Works	Qtly EMF and EPR Compliance Audit	-	-	-	-	-	All 62 of the relevant/triggered EPRs

Audit Findings, Corrective Actions and Compliance

North Package

The findings raised during the FIEA Compliance Audit Program conducted on the North Package (M80RRA) for the Reporting Period and the close out of those findings within the Reporting Period are summarised in Table E.2.

¹ Not applicable – East Package works had not commenced within Reporting Period.

² Not applicable – West Package works had not commenced within Reporting Period.

Table E.2 – North Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0
Area for Improvement (AFI)	0	1	1	0
Observation	0	7	4	3
Total	0	8	5	3

North Package (M8ORRA) activities were considered to be Compliant with the 69 EPRs covered by the scope of the compliance audits conducted in the Reporting Period as summarised in Table E.2, given that no Non-Compliances were identified.

Whilst a single AFI and seven (7) Observations were raised during the Reporting Period Audits, M8ORRA has addressed and closed-out, the AFI and four (4) of the Observation findings identified during the Reporting Period.

South Package

The findings raised during the FIEA Compliance Audit Program conducted on the South Package (EFBTA) for the Reporting Period and the close out of those findings within the Reporting Period are summarised in Table E.3.

Table E.3 – South Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	4	3	1
Area for Improvement (AFI)	0	4	1	3

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Observation	3 ³	4	5	2
Total	3	12	9	6

The South Package (EFBTA) activities were considered to be Compliant with 53 of the 56 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these 53 EPRs. However, four (4) Non-compliance findings were raised against the remaining three (3) EPRs and against EMF Section 3. *Statutory Approvals and Consents*.

Three (3) of the Non-compliance findings were closed during the Reporting Period. One (1) Non-compliance finding against EPR CL1 remained open. This was associated with lack of signposts for spoil stockpiles and was raised during the Monthly Environmental Performance Compliance Audit conducted on 24 April 2024 (i.e., at the end of the Reporting Period). The FIEA will assess corrective actions undertaken by EFBTA to close this finding during the next audit to be conducted in the next Reporting Period.

The IEA does not consider that the audit findings closed during the Reporting Period represent systemic issues or present significant or ongoing material risks to the environment. The Non-compliance finding which remained open at the end of the Reporting Period will require appropriate corrective action to manage and control environmental risks.

Project-wide EPRs (MRPV)

The findings raised during the FIEA Compliance Audit Program conducted on the Project-wide EPRs for which MRPV is fully or partially responsible for the Reporting Period (i.e., one (1) EPR Compliance Audit) and the close out of those findings within the Reporting Period are summarised in Table E.4.

Table E.4 – Project-wide EPRs (MRPV) Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0

³ Prior to the FIEA being engaged, the CP IEA completed a single compliance audit assessing implementation of EFBTA's *WEMP - Site Investigation*. Three (3) observations were raised during this audit and were *currently* open at the beginning of the FIEA Reporting Period as closure had not previously been subject to IEA assessment.

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Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Areas for Improvement	0	0	0	0
Observation	0	1	1	0
Total	0	1	1	0

During the Reporting Period, the single Project-wide EPR compliance audit conducted by the FIEA audited all 13 Project-wide EPRs (for which MRPV is fully or partially responsible) that are currently triggered by the Program, and for which the FIEA is responsible for auditing.

MRPV's activities were considered to be compliant with the 13 EPRs covered by the scope of the Project-wide EPR compliance audit conducted in the Reporting Period as summarised in Table E.4 given that no Non-compliances were identified.

Whilst a single Observation was raised during the Reporting Period, MRPV provided consideration against the Observation such that it was closed in light of the EMF requirements.

Indara Tower Relocation Works

The findings raised during the FIEA Compliance Audit Program conducted on the Indara Tower Relocation Works for the Reporting Period (i.e., one (1) EMF and EPR Compliance Audit) and the close out of those findings within the Reporting Period are summarised in Table E.5.

Table E.5 – Indara Tower Relocation Works Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised During Reporting Period	Closed During Reporting Period	Open at end of Reporting Period
Non-Compliance	0	5	5	0
Areas for Improvement	0	1	1	0
Observation	0	6	4	2
Total	0	12	10	2



The FIEA audited all 62 EPRs relevant to the Indara Tower Relocation Works activities during the single compliance audit conducted in the Reporting Period.

The Indara Tower Relocation Works were considered to be Compliant with 58 of the 62 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these EPRs. However, five (5) Non-compliance findings were raised against four (4) EPRs. The five (5) Non-compliance findings and the Indara Tower Relocation Works were all closed and completed, respectively, during the Reporting Period. In addition, all but two (2) Observations were also closed during the Reporting Period.

Given the Indara Tower Relocation Works have been completed and based on MRPV's and Indara's responsiveness in closing out findings identified during the Reporting Period, other than two (2) Observations which remain open, the FIEA does not consider that the audit findings represent systemic issues or present significant or ongoing material risks to the environment.

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Abbreviations and Glossary

Abbreviation	Expanded Form
AFI	Area for Improvement
AS/NZS	Australian/New Zealand Standard
CCP	Construction Compound Plan
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CP IREA	Central Package Independent Reviewer and Environmental Auditor
DEECA	Department of Energy, Environment and Climate Action
DTP	Department of Transport and Planning
EES	Environment Effects Statement
EFBTA	Eastern Freeway Burke to Tram Road Alliance
EMF	Environmental Management Framework, January 2020
EPA	Environment Protection Authority Victoria
EPR	Environmental Performance Requirement
FIEA	Freeway Packages Independent Environmental Auditor
FP	Freeway Packages
IEA	Independent Environmental Auditor
IR	Independent Reviewer (a component of the broader CP IREA)
ISO	International Standard Organisation
M8ORRA	M80 Ring Road Alliance
MRPV	Major Road Projects Victoria
MTIA	Major Transport Infrastructure Authority
NEL	North East Link
NELEW	North East Link Enabling Works
NEL FP	North East Link Freeway Packages
NELP	North East Link Program
NOPs	Non-Owner Participants
OEMP	Operations Environmental Management Plan
SDP	Service Delivery Plan
SMP	Spoil Management Plan
SuMP	Sustainability Management Plan
TMP	Transport Management Plan
VIDA	Victorian Infrastructure Delivery Authority
WEMP	Worksite Environmental Management Plan (also referred to as Worksite Environmental Implementation Plan within EMF)

Term	Definition
Alliance(s)	<p>MRPV is procuring four separate Alliances to design and build the Freeway Packages. The participants in each Alliance will include:</p> <ul style="list-style-type: none"> • MRPV, as the Project Owner and Owner Participant, to represent the State through delivery of the Freeway Packages; and, • The Non-Owner Participants (NOPs). <p>The use of the single term ‘Alliance’ includes the plural, and the use of the plural ‘Alliances’ includes the single.</p>
Audit	<p>Audit in this context, as defined in the EMF, refers to assessment of compliance with the EMF, relevant EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, other plans as required by the EPRs and conditions of Program approvals, adopting a risk-based approach (founded in the guiding principles of <i>AS/NZS ISO 19011:2019 Guidelines for auditing management systems</i>).</p> <p>Any reference to ‘audit’ has not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this Report.</p>
Contractor(s)	<p>The terms ‘Contractor’ or ‘Contractors’ are intended to apply, interchangeably, to the Freeway Packages Alliances and any other entities whose activities the FIEA may be required to review and audit over the course of the Program.</p>
Freeway Packages	<p>The four (4) Freeway Packages will deliver connectivity between the M80 Ring Road and the twin road tunnels, upgrade the Eastern Freeway and build the Doncaster Busway between Doncaster Park and Ride and Hoddle Street.</p>
Incorporated Document	<p>The North East Link Program Incorporated Document, December 2019.</p>
Independent Environmental Auditor	<p>The independent party(s) appointed by the Victorian Government to undertake environmental reviews and environmental audits of project activities including assessing compliance with the EMF.</p>
Major Road Projects Victoria	<p>Major Road Projects Victoria (MRPV) is responsible for delivering the North East Link Program (NELP) on behalf of the Victorian Government.</p> <p>Under the MRPV umbrella, a dedicated road project office was established in August 2023 to include the NELP, Westgate Tunnel Project and Major Road Projects Victoria (MRPV).</p>
Major Transport Infrastructure Authority	<p>The Major Transport Infrastructure Authority (MTIA) was the proponent for the Program, as an administrative office within the Victorian Department of Transport.</p> <p>By virtue of Administrative Arrangements Order No. 144 effective from 2 April 2024, the name of the MTIA was changed to the Victorian Infrastructure Delivery Authority (VIDA).</p> <p>Accordingly, all references to MTIA will now be referred to as VIDA (refer to Victorian Infrastructure Delivery Authority below)</p>

Non-contestable Works	Non-contestable works typically involve regular maintenance, operation, and administration of a distribution network. These works are exclusive to the incumbent distributor.
North East Link Central Package	The Central Package, which comprises Victoria’s longest twin road tunnels under the Yarra River, has commenced delivery and is being delivered as an availability Public Private Partnership (PPP) by Project Co.
North East Link Enabling Works	North East Link Enabling Works (NELEW) was the first package of works for the Program, comprising the design development and potential modification, relocation and/or protection of utility services which will be impacted, or are in close proximity to the main North East Link works.
North East Link Program (NELP) (i.e., Organisation)	<p>North East Link Program (NELP) was an organisation within MTIA that was responsible for developing and delivering the Program on behalf of the Victorian Government.</p> <p>In August 2023 a dedicated road project office was established to include the North East Link Program (i.e., the Program), Westgate Tunnel Project and Major Road Projects Victoria (MRPV) under the MRPV umbrella.</p> <p>Accordingly, all references to NELP (i.e., the organisation not the Program) will now be referred to as MRPV (refer to Major Road Projects Victoria above).</p>
Program or North East Link Program (NELP)	The North East Link Program approved under the Incorporated Document.
Review	Any references to ‘review’ has not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board.
Victorian Infrastructure Delivery Authority	The Victorian Infrastructure Delivery Authority (VIDA) is the proponent for the Program. The VIDA is an administrative office within the Victorian Department of Transport with responsibility for overseeing major transport programs.

1. Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that Major Road Projects Victoria (MRPV) provides Six-Monthly Summary Reports as to compliance with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning. In accordance with Section 7.3 of the EMF, these reports must summarise the audit activities undertaken 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.

1.1 Purpose of this Report

This Report presents the initial NELP Freeway Packages Independent Environmental Auditor (FIEA) Six-Monthly Summary Report covering the period:

- **November 2023 to April 2024** inclusive (herein referred to as the Reporting Period).

This Report covers audits conducted by the FIEA on activities associated with:

- Construction of NELP Freeway Packages (restricted to the North and South Freeway Packages for the reporting period);
- Addressing specific 'Project-wide' EPRs for which MRPV is fully or partially responsible; and,
- Relocation of the Indara telecommunications tower at Thompsons Road, Bulleen, which comprised non-contestable works.

This Report has been prepared by KPMG, which has been engaged by MRPV as the FIEA, in accordance with the EMF.

For the purposes of the FIEA services and as defined in the EMF, 'audit' refers to assessment of compliance with the EMF, relevant Environmental Performance Requirements (EPRs), Environmental Strategy, Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), other plans as required by the EPRs and conditions of Program approvals, adopting a risk-based approach (founded in the guiding principles of *AS/NZS ISO 19011:2019 Guidelines for auditing management systems*).

Any references to 'audit' in this Report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this Report.

1.2 Report Structure

The structure of this Report has been developed in accordance with the Section 7.3 of the EMF and summarises:

- **Section 2 North East Link Program Overview** – provides the context within which this Report has been prepared, including: an overview of the North East Link (NEL); an outline of the Freeway Packages, which are predominantly the subject of the Report; the EMF and EPRs, providing context on the compliance framework against which audits are conducted; and, the role of the IEA;
- **Section 3 Audit Activities** – provides a summary of the FIEA Compliance Audit Program and the audit activities conducted during the Reporting Period;
- **Section 4 Audit Findings and Corrective Actions** – summarises the compliance audit findings during the Reporting Period in accordance with the EPR topics, and the status of actions taken by the respective Contractor to address previous audit findings; and,
- **Section 5 Overall Compliance** – provides the FIEA’s assessment with respect to the Freeway Packages Alliance’s, MRPV’s and other auditees overall compliance with the EMF and EPRs.

2. North East Link Program Overview

2.1 North East Link

The North East Link (NEL) connects the Eastern Freeway at Bulleen Road, Bulleen, 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 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 and managed motorway environment; and,
- Tolling systems and associated infrastructure.

NEL is being delivered, as part of Victoria's Big Build, by MRPV, on behalf of the State, as a Program comprising several packages (Figure 2.1 provides an outline of the NEL works), including:

- **NEL Enabling Works (NELEW)**, comprising relocation of services to enable the Program and delivery of the Bulleen Park and Ride, which commenced in 2019 and is nearing completion;
- **Central Package**, which comprises the construction of twin road tunnels beneath the Yarra River, and is being delivered by Spark North East Link Pty Ltd as the Trustee of Spark North East Link Trust (Project Co); and,
- **Four (4) Freeway Packages** of works, which are described in Section 2.2.

Separate IEA's conduct IEA services on the Central Package, which includes both an Independent Reviewer and an IEA referred to as the Central Package IREA (CP IREA), and on the NELEW package (NELEW IEA). Consequently, separate Six-Monthly Summary Reports are prepared for both the Central Package and the NELEW and these should be referred to for summaries of the IEA compliance audit programs covering these packages respectively.

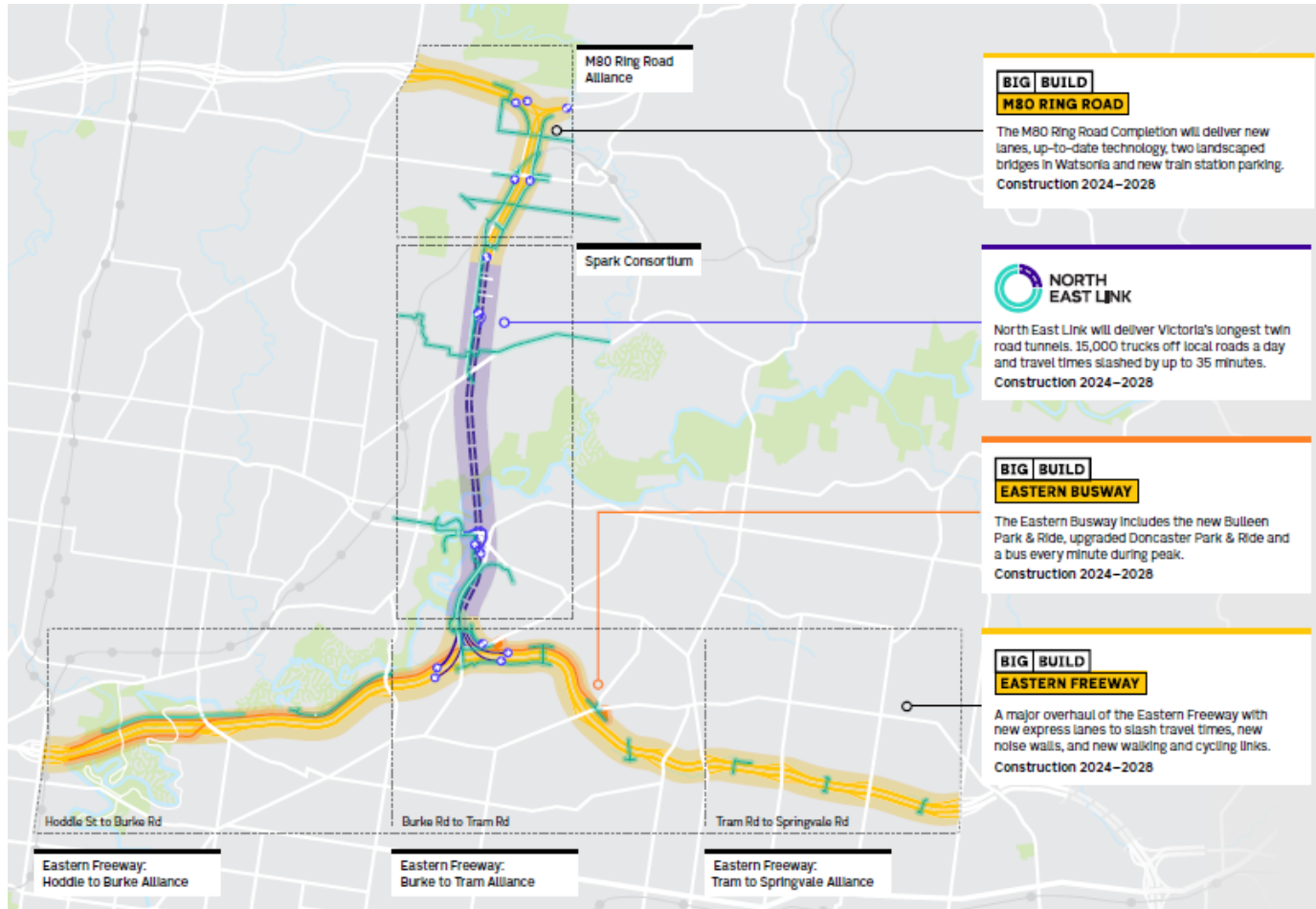


Figure 2.1: NEL Packages

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2.2 Freeway Packages

The North, South, East and West Packages are collectively known as the ‘Freeway Packages’ and are the subject of this Report.

It should be noted that this Report also covers other audit activities conducted by the FIEA, including specific ‘Project-wide’ EPRs, for which MRPV is fully or partially responsible, and non-contestable works associated with relocation of the Indara telecommunications tower at Thompsons Road, Bulleen.

The scope of each Freeway Package (FP) is outlined herein:

2.2.1 North Package

The North Package includes the design and delivery of a new road connection between the Central Package and the M80 Ring Road, which consists of major upgrades to sections of the Greensborough Highway Corridor and Bypass interchange, and a significant upgrade to the M80 Ring Road.

The North Package is being delivered by the M80 Ring Road Alliance (M8ORRA), which comprises MRPV, Acciona Construction Australia Pty Ltd, AECOM Australia Pty Ltd and MACA Civil Pty Ltd.

Construction activities associated with the North Package commenced in November 2023 with the establishment of construction compounds. Prior to this, early works, generally comprising site investigations, had commenced.

2.2.2 South Package

The South Package consists of an upgrade to the section of the Eastern Freeway between Burke and Tram Roads, and the addition of an elevated freeway interchange located near the southern portal of the Central Package.

The South Package is being delivered by the Eastern Freeway Burke to Tram Road Alliance (EFBTA), which comprises MRPV, Laing O’Rourke Australia Construction Pty Ltd, Symal Infrastructure Pty Ltd, WSP Australia Pty Ltd and Arcadis Australia Pacific Pty Ltd.

Construction activities associated with the South Package commenced in November 2023 with the establishment of construction compounds. Prior to this, early works, generally comprising site investigations, had commenced.

2.2.3 East Package

The East Package will include design and construction of the Eastern Freeway upgrade from Tram Road to Springvale Road.

At the time of the Reporting Period, the East Package was under tender evaluation and consequently no works were being delivered for the East Package.

2.2.4 West Package

The West Package will include design and construction of the Eastern Freeway upgrade from Burke Road to Hoddle Street.

At the time of the reporting period, the West Package was under tender evaluation and consequently no works were being delivered for the West Package.

2.3 EMF and EPRs

The approved NELP Planning Scheme Amendment (GC98), under the Victorian *Planning and Environment Act 1987*, introduces the NELP Incorporated Document into the Banyule, Boroondara, Manningham, Nillumbik, Whitehorse, Whittlesea and Yarra Planning Schemes. The Incorporated Document requires the preparation of an EMF for the Program to the satisfaction of the Minister for Planning. Consequently, the NELP EMF (dated 12 July 2021), under which the Program is being delivered, was approved by the Minister for Planning on 21 July 2021.

The purpose of the EMF was to provide a transparent framework to manage the environmental impacts of the Project in order to meet statutory requirements, protect environmental values and sustain stakeholder confidence.

The EMF specifies the environmental management arrangements for Program 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 Program;
- 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. This documentation, which a Contractor is required to prepare and implement, includes Environmental Strategy, Urban Design and Landscape Plans (UDLPs), Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), and other plans as required by the EPRs;
- The approach to evaluating compliance with the EMF and EPRs, including monitoring, auditing and reporting processes; and
- The EPRs that define the minimum environmental outcomes that must be achieved during design, construction and operation of the NELP.

The EPRs comprise a suite of 110 performance-based environmental standards and outcomes across the following 17 topics:

- 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.

The EPRs are intended to minimise impacts and the risk of harm to human health and the environment to within reasonable limits having regard to contextual factors and the practical delivery of the Program.

Compliance with the EMF and EPRs is mandated by the terms of the Incorporated Document, which require the use and development of the Program to be in accordance with the EMF and EPRs approved by the Minister for Planning.

Each Freeway Package Alliances' activities and scope of works must comply with all relevant EPRs. Not all EPRs are applicable to the Freeway Packages and to every stage of the Freeway Packages works. In addition, not all the EPRs are the responsibility of each Freeway Package Alliance, with MRPV being fully or partially responsible for compliance with specific EPRs. The EPRs audited during the Reporting Period are provided in Appendix A.

2.4 Independent Environmental Auditor

The EMF requires an IEA be appointed to review environmental documentation to verify compliance with, and undertake environmental audits of Project activities to assess compliance with, the EMF, EPRs, Environmental Strategy, CEMP, WEMPs, CCPs and conditions of Program approvals.

The IEA is also responsible for preparing a Six-Monthly Summary Report (i.e., this Report) summarising audit activities during the reporting period, audit findings, the status of corrective actions taken to address previous audit findings and the contractors' compliance with the EMF and EPRs; and providing it to MRPV and the contractor. In turn, it is MRPV's responsibility to provide the Six-Monthly Summary Reports to the Minister for Planning.

An overview of the IEA’s role within the framework of environmental documentation developed and implemented to control and manage the Program is presented in Figure 2.2.

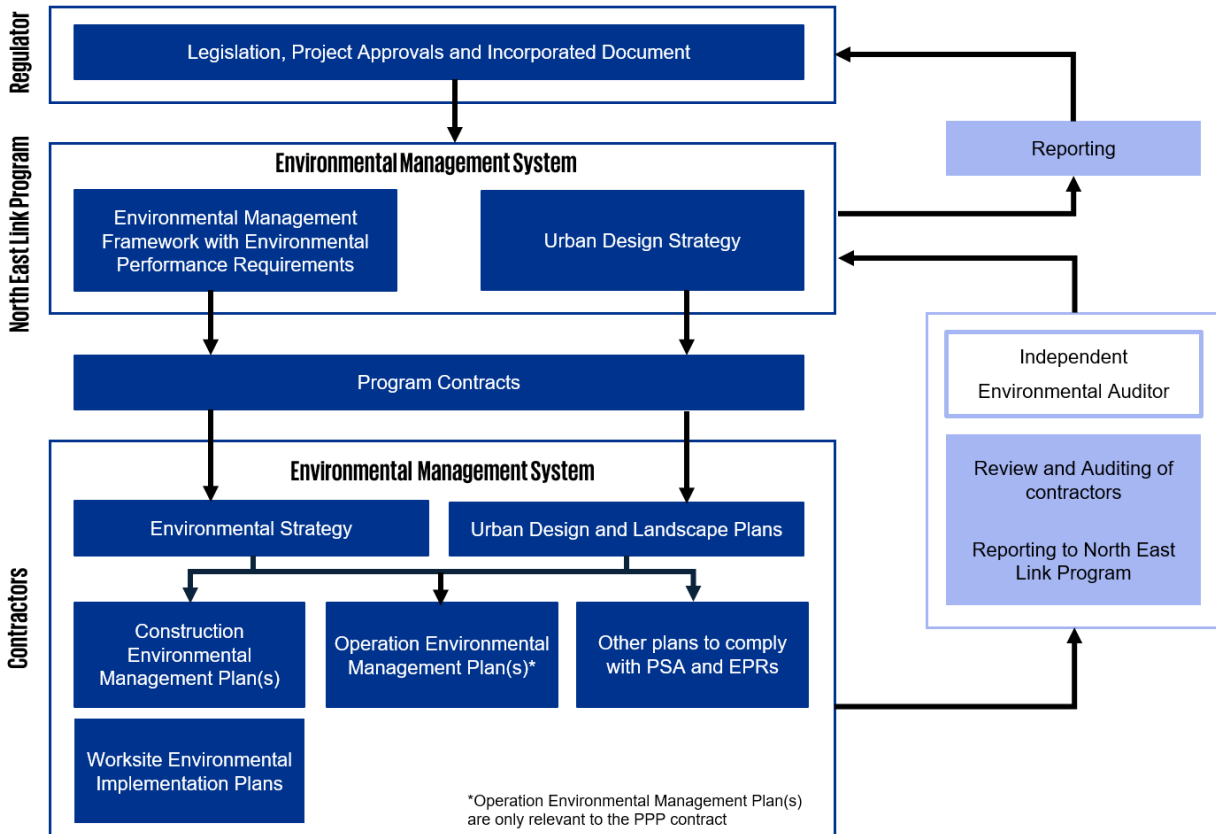


Figure 2.2: Overview of relationship between MRPV (referred to in the Figure as NELP), Contractors (i.e., Freeway Packages Alliances) and IEA (extract of Figure 6-1 of the EMF (dated 12 July 2021))

3. Audit Activities

The FIEA Compliance Audit Program methodology and details of the compliance audit activities conducted in accordance with that methodology across the Reporting Period, are summarised herein:

3.1 FIEA Compliance Audit Program

To assess compliance of the Freeway Package Program with the EMF, relevant EPRs, Environmental Strategies, CEMPs, WEMPs, CCPs, other plans as required by the EPRs and conditions of Program approvals, the FIEA developed and implemented a Compliance Audit Program comprising two (2) types of compliance audit, to be conducted per Freeway Package (refer to Table 3.1 for an overview of each type of audit).

The Compliance Audit Program methodology has been developed applying a risk-based approach, and with reference to the principles described in AS/NZS ISO 19011:2019.

Table 3.1: FIEA Compliance Audit Program Overview (Note: applies per Freeway Package)

Type of Compliance Audit	Summary	Schedule	Duration
Environmental Performance Audit	Environmental Performance Audits will be conducted on a rotational basis to each active project site predominantly assessing compliance against: <ul style="list-style-type: none"> WEMPs; and, CCPs (if applicable to the site being audited). 	Monthly (on a rotational basis to active project sites)	One (1) day on-site
EMF and EPR Compliance Audit	EMF and EPR Compliance Audits will be conducted to assess Freeway Package Alliance’s compliance with: <ul style="list-style-type: none"> The EMF; EPRs; Environmental Strategy; CEMP and any subplans; Any other plans required by the EPRs being audited; Conditions of program approvals; UDS; and, As required by MRPV. Note: In the month they are conducted, these quarterly audits also include the Monthly Environmental Performance Audits described above.	Quarterly	Two (2) days on-site

3.1.1 Risk-based Audit Scoping

A risk-based approach (founded in the guiding principles of AS/NZS ISO 19011:2019), is used to determine the scope for each Compliance Audit considering, but not limited to:

- Activities being undertaken by the Freeway Package Alliance;
- The locations in which Freeway Package Alliances activities are being undertaken;
- Complaints received and incidents occurring; and,
- EPRs considered to represent a higher Program risk.

Given a risk-based approach is applied to the Compliance Audit Program, each audit does not involve an exhaustive assessment against every requirement of the EMF and every EPR. Whilst higher-risk activities will be audited more frequently, the Compliance Audit Program will be conducted to assess compliance with all relevant EPRs at least once every 12 months.

The scope for each audit is discussed and agreed with the Freeway Package Alliance and MRPV during a monthly scoping meeting. An Audit Plan to guide each audit is subsequently prepared to MRPV's satisfaction and provided to the Freeway Package Alliance prior to the audit.

Standing scope items that are addressed during the audits include:

- At each and every audit, assessment of corrective actions undertaken by the auditee to close out findings arising from previous audits; and,
- During EMF and EPR Compliance Audits, review of complaints received and incidents arising across the audit period.

3.1.2 Approach

The approach for each Compliance Audit, involves assessment of documents and records provided by the Freeway Package Alliances (and other auditees), site visit(s), and interviews with relevant personnel.

The team for each audit is selected to confirm its members include the competencies and qualifications required to assess the criteria included within the audit scope. For Quarterly EMF and EPR Compliance Audits the team comprises a Lead Environmental Auditor, a supporting Environmental Auditor and relevant Subject Matter Experts (SMEs). Whilst the audit team for Monthly Environmental Performance Audits comprises a Lead Environmental Auditor and supporting Environmental Auditor.

The approach applied to each type of Compliance Audit is summarised in Table 3.2.

Table 3.2: Compliance Audit approach

Approach item	Approach details
Inception meeting	<ul style="list-style-type: none"> An inception meeting is held with MRPV and the Freeway Package Alliance upon commencement of the Compliance Audit to provide an overview of the scope and schedule of the Compliance Audit and introduce those involved in the audit, including the FIEA Audit Team and MRPV and Freeway Package Alliance attendees.
Interviews	<ul style="list-style-type: none"> Informal interviews with appropriate attendees are conducted concurrently with documentation assessment and site visits throughout the Compliance Audit.
Documentation assessment	<ul style="list-style-type: none"> A key part of each audit involves sighting appropriate documentation to determine if those project activities subject to the audit meet the compliance requirement being assessed.
Site visits	<ul style="list-style-type: none"> Site visits are conducted to those locations included within the audit scope.
Close out meeting	<ul style="list-style-type: none"> A close out meeting is held with MRPV and the Freeway Package Alliance to present and discuss the findings from the Compliance Audit.

3.1.3 Audit Finding Categories and Reporting

The findings from each audit are classified using the audit finding categories presented in Table 3.3.

Table 3.3: Audit finding categories

Audit Finding Categories	Definition
Compliance	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the audit criterion.
Non-compliance	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. 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-conformance.
Areas for Improvement (AFI)	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.

Audit Finding Categories	Definition
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 is insufficient evidence to make a judgement on 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.

The main output from each Compliance Audit, regardless of the type of audit, comprises a compliance-focused report, although details of findings are provided on an exceptions-basis only (i.e., detail is only provided against compliance requirements where Non-compliances, Area for Improvement and Observations have been identified).

3.2 Compliance with EMF and EPRs

The requirements of the EMF have been implemented by each auditee (e.g., Freeway Package Alliances, MRPV etc) through the preparation and implementation of Program specific environmental management plans (specified within the EMF and its associated EPRs), as outlined in Figure 2.2. These plans have been reviewed and verified by the FIEA and accepted by MRPV and, in some cases, approved by the Minister for Planning (i.e., CCPs and UDLPs).

FIEA auditing of the EMF requirements during the Reporting Period has focussed on assessment of compliance with the Freeway Package Alliance’s and MRPV’s Program specific environmental management plans, including against the Environmental Strategy, CEMP, WEMPs, CCPs and other plans required by the EPRs. Consequently, compliance with the EMF and EPRs is audited through audits of the EPRs and the Plans required by the EMF and EPRs, including WEMPs.

Whilst the scope of the Quarterly EMF and EPR Compliance Audits focuses on assessing Freeway Package-level compliance with specific EPRs (as per the scope of each audit) and components of the Environment Strategy and CEMP, the scopes of the Monthly Environmental Performance Audits also assess compliance with EPRs and program approvals insofar as they are applicable at the site-level (i.e. construction work sites) subject to the Environmental Performance Audit. This results from assessing implementation of the WEMPs, which by their nature, include controls to comply with EMF and EPR topics appropriate to a specific construction site and activities. Consequently, in the process of assessing compliance and providing observations and findings on WEMPs, technical adequacy and effectiveness of actions taken to comply with the EMF, EPRs, Environmental Strategy, CEMP, other plans as required by the EPRs and program approvals, insofar as they are applicable to the site subject to the Monthly Environmental Performance Audit, are considered.

3.3 FIEA Reporting Period Audit Activities

The FIEA Scope of Works for the Compliance Audit Program during the Reporting Period was determined using a risk-based approach with consideration of the stage and risk profile of the works being undertaken and was informed by discussions with MRPV and the Freeway Package Alliances during the Reporting Period.

A summary of the compliance audits conducted by the FIEA across the Reporting Period is provided in Table 3.4. Further details with respect to the scopes of the compliance audits completed within the Reporting Period are provided for each Freeway Package in the following sections (refer to Sections 3.2.1 to 3.2.5).

Table 3.4: FIEA Compliance Audits conducted in Reporting Period

Package	November 2023	December 2023	January 2024	February 2024	March 2024	April 2024
North Package (M80RRA)	Monthly Env Performance Audit	-	-	Qtly EMF and EPR Compliance Audit	Monthly Env Performance Audit	Monthly Env Performance Audit
South Package (EFBTA)	-	Monthly Env Performance Audit	-	Qtly EMF and EPR Compliance Audit	Monthly Env Performance Audit	Monthly Env Performance Audit
East Package (TBC)⁴	-	-	-	-	-	-
West Package (TBC)⁵	-	-	-	-	-	-
Project-wide EPRs (MRPV)	EPR Compliance Audit	-	-	-	-	-
Indara Tower Relocation Works	Qtly EMF and EPR Compliance Audit	-	-	-	-	-

⁴ Not applicable – East Package works had not commenced within Reporting Period

⁵ Not applicable – West Package works had not commenced within Reporting Period

3.3.1 North Package (M80RRA) Compliance Audits

The scope of each of the Compliance Audits conducted on the North Package, being delivered by M80RRA, during the Reporting Period is summarised in Table 3.5.

94 EPRs were relevant to/triggered by the North Package activities during the Reporting Period. The FIEA Compliance Audit Program assessed compliance against 69 of these relevant EPRs during the Reporting Period. The EPRs assessed included those addressed by the WEMPs and CCPs assessed at a site-level during the Monthly Environment Performance Audit, and the Package-level EPRs included within the scope of the Quarterly EMF and EPR Compliance Audit.

Table 3.5 – Scope of North Package (M80RRA) Audits

Month	Summary of scope
Nov 2023	<p>Monthly Environment Performance Audit assessed implementation of:</p> <ul style="list-style-type: none"> • <i>WEMP Site Investigations and Site Establishment</i>, including visits to active site investigation locations
Dec 2023	No audit conducted
Jan 2024	No audit conducted
Feb 2024	<p>Quarterly EMF and EPR Compliance Audit:</p> <ul style="list-style-type: none"> • EMF and EPRs assessed: <ul style="list-style-type: none"> • Environmental Strategy and CEMP components including: Environmental Training, Awareness and Competencies; Consultation and Communications (Incidents and Emergencies); and Non-conformance, Preventive and Corrective Actions / Management Plan Change Improvement Processes; • Environmental Management Framework EPRs EMF1, EMF2 and EMF4 (Note: State is responsible for EPR EMF3); • Air Quality EPR AQ6; • Arboriculture EPRs AR1 to AR3; • Flora and Fauna EPRs FF1 to FF10; • Noise and Vibration EPRs NV1, NV3 to NV6, NV8 to NV10, and NV13 to NV15 (Note: EPRs NV2, NV7, NV11, NV12 and NV16 not relevant either to package or during reporting period); and, • Sustainability and Climate Change EPRs SCC1 to SCC5 • Construction sites assessed: <ul style="list-style-type: none"> • Gabonia Construction Compound – implementation of in-scope EPRs, WEMP and CCP assessed; • AK Lines Construction Compound – implementation of in-scope EPRs, WEMP and CCP assessed; • Zone 3300-3400 – implementation of Arboriculture and Flora and Fauna EPRs.
Mar 2024	<p>Monthly Environment Performance Audit:</p> <ul style="list-style-type: none"> • <i>WEMP - Zone 3100-3200 Phase 1</i>, with site visit to M80RRA works on the M80 Highway Mound and Shoulder.
Apr 2024	<p>Monthly Environment Performance Audit:</p>

Month	Summary of scope
	<ul style="list-style-type: none"> WEMP - Zone 3300-3400 Phase 1, with site visit to M80RRA’s work Zone 3300-3400.

For the purposes of assessing compliance with all relevant EPRs at least once every 12 months for the North Package, the initial 12 months of the North Package Compliance Audit Program is considered to have commenced as of the first Quarterly EMF and EPR Compliance Audit conducted in February 2024. Consequently, the FIEA will have assessed all relevant EPRs for the North Package, at a Package-level, by the end of January 2025 (in practice, to be completed in the Quarterly EMF and EPR Compliance Audit scheduled for November 2024).

3.3.2 South Package (EFBTA) Compliance Audits

The scope of each of the Compliance Audits conducted on the South Package, being delivered by EFBTA, during the Reporting Period is summarised in Table 3.6.

87 EPRs were relevant to/triggered by the South Package during the Reporting Period. The FIEA Compliance Audit Program assessed compliance against 56 of these relevant EPRs during the Reporting Period. The EPRs assessed included those addressed at a site-level by the WEMPs and CCPs assessed during the Monthly Environment Performance Audit, and the Package-level EPRs included within the scope of the Quarterly EMF and EPR Compliance Audit.

Table 3.6 – Scope of South Package (EFBTA) Audits

Month	Summary of scope
Nov 2023	No audit conducted
Dec 2023	Monthly Environment Performance Audit assessed implementation of: <ul style="list-style-type: none"> WEMP Site Investigations, including visits to active site investigation locations
Jan 2024	No audit conducted
Feb 2024	Quarterly EMF and EPR Compliance Audit: <ul style="list-style-type: none"> EMF and EPRs assessed: <ul style="list-style-type: none"> Environmental Strategy and CEMP components including: Legal and Other Requirements; Environmental Management; and, Inspections, Monitoring and Auditing; Environmental Management Framework EPRs EMF1, EMF2 and EMF4 (Note: State is responsible for EPR EMF3); Air Quality EPR AQ6; Arboriculture EPRs AR1 to AR3; Flora and Fauna EPRs FF1 to FF6, FF8 and FF9 (Note: EPRs FF7 and FF10 not relevant either to package or during reporting period);

Month	Summary of scope
	<ul style="list-style-type: none"> Noise and Vibration EPRs NV1, NV3 to NV5, NV8, NV9, and NV13 to NV15 (Note: EPRs NV2, NV6, NV7, NV10 to NV12 and NV16 not relevant either to package or during reporting period); and, Sustainability and Climate Change EPRs SCC1, SCC2, SCC4 and SCC5 (Note: EPR SCC3 not relevant to package). Construction sites assessed: <ul style="list-style-type: none"> Bulleen Interchange Construction Compound – implementation of in-scope EPRs, WEMP and CCP assessed.
Mar 2024	Monthly Environment Performance Audit: <ul style="list-style-type: none"> WEMP – Freeway Golf Course Construction Compound Zone 5100 and CCP – Freeway Golf Course, with site visit to Freeway Golf Course Construction Compound.
Apr 2024	Monthly Environment Performance Audit: <ul style="list-style-type: none"> WEMP – Zone 5200 West Mainline Stage1A, with site visit to EFBTA’s Zone 5200 – Eastern Freeway (East of Burke Road to West of Estelle Street Bridge).

For the purposes of assessing compliance with all relevant EPRs at least once every 12 months for the South Package, the initial 12 months of the South Package Compliance Audit Program is considered to have commenced as of the first Quarterly EMF and EPR Compliance Audit conducted in February 2024. Consequently, the FIEA will have assessed all relevant EPRs for the South Package, at a Package-level, by the end of January 2025 (in practice, to be completed in the Quarterly EMF and EPR Compliance Audit scheduled for November 2024).

3.3.3 East Package Compliance Audits

At the time of the Reporting Period, the East Package was under tender with no works being delivered and consequently no IEA Compliance Audits were conducted.

3.3.4 West Package Compliance Audits

At the time of the Reporting Period, the West Package was under tender with no works being delivered and consequently no IEA Compliance Audits were conducted.

3.3.5 Other FIEA Compliance Audits

During the Reporting Period the FIEA conducted two (2) additional Compliance Audits as follows:

Project-wide EPRs (MRPV)

MRPV is responsible, either in full or partially, for compliance with 18 EPRs that apply on a Project-wide basis. The FIEA is responsible for assessing MRPV’s compliance with 15 of these Project-wide EPRs (refer to Table 3.7), whilst the CP IREA is responsible for assessing MRPV’s compliance with the remaining three (3), being Business EPRs B2 and B3 and Sustainability and Climate Change EPR SCC2 (refer to the NELP – Central Package IEA Six-Monthly Environmental Compliance Reports for details of audits associated with assessment of these Project-wide EPRs).

In November 2023, the FIEA conducted a Project-wide EPR Compliance Audit, assessing MRPV’s compliance with 13 of the 15 Project-wide EPRs (Table 3.7 provides details of the scope of this audit). The Compliance Audit comprised interviews with MRPV personnel and review of documentary evidence.

Table 3.7: Scope of FIEA Project-wide EPRs Compliance Audit

EPR Topic	EPRs and responsibility for compliance	Subject to Nov 2023 FIEA Compliance Audit
Air Quality	<ul style="list-style-type: none"> EPR AQ4 (State only responsibility) 	Not audited as not triggered during Reporting Period (will be triggered one (1) year prior to operation of the NELP)
Arboriculture	<ul style="list-style-type: none"> EPR AR3 (shared responsibility) 	Yes
Flora and Fauna	<ul style="list-style-type: none"> EPR FF2 (shared responsibility) EPR FF7 (State only responsibility) EPR FF10 (State only responsibility) 	Yes
Groundwater	<ul style="list-style-type: none"> EPR GW2 (shared responsibility) 	Yes
Land Use Planning	<ul style="list-style-type: none"> EPR LP5 (shared responsibility) 	Yes
Noise and Vibration	<ul style="list-style-type: none"> EPR NV2 (shared responsibility) 	Not audited as not triggered during Reporting Period (traffic noise monitoring required post NELP opening)
Social and Community	<ul style="list-style-type: none"> EPR SC3 (shared responsibility) EPR SC4 (shared responsibility) EPR SC5 (shared responsibility) EPR SC7 (State only responsibility) EPR SC8 (State only responsibility) 	Yes
Surface Water	<ul style="list-style-type: none"> EPR SW15 (shared responsibility) 	Yes
Traffic and Transport	<ul style="list-style-type: none"> EPR T3 (shared responsibility) 	Yes

Indara Tower Relocation Works

The Indara Tower Relocation Works comprised relocation of the Indara telecommunication Tower located on Thompsons Road, Bulleen to a new location also on Thompsons Road. These comprised non-contestable works undertaken by Indara and involved construction of a new communications tower and decommissioning and demolition of the existing tower.

62 EPRs were relevant to/triggered by the Indara Tower Relocation Works during the Reporting Period.

In November 2023, the FIEA conducted an EMF and EPR Compliance Audit of the Indara Tower Relocation Works. Given the short duration of the Indara Tower Relocation Works, which was completed within the Reporting Period, these works were subject to a single audit. Consequently, the scope of the Compliance Audit covered all 62 EPRs relevant to the Indara Tower Relocation Works (refer to Table 3.8).

The Compliance Audit comprised interviews with MRPV personnel, review of documentary evidence and a visit to the newly installed Indara Tower work site.

Table 3.8: Scope of Indara Tower Relocation Works EMF and EPR Compliance Audit

EPR Topic	Relevant EMF and EPRs assessed
Environmental Management Framework	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF1 to EMF4
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1
Air Quality	<ul style="list-style-type: none"> EPRs AQ1 and AQ6
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3
Business	<ul style="list-style-type: none"> EPRs B1 and B4 to B8
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF3 and FF5
Ground Movement	<ul style="list-style-type: none"> Not applicable – no EPRs relevant to the Indara Tower Relocation Works
Groundwater	<ul style="list-style-type: none"> EPR GW2 and GW4
Historical Heritage	<ul style="list-style-type: none"> EPR HH1
Land Use Planning	<ul style="list-style-type: none"> EPRs LP1 to LP3
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV1 to LV4
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV3 to NV5, NV8, NV9, NV14 and NV15
Social and Community	<ul style="list-style-type: none"> EPRs SC1 to SC4 and SC7
Surface Water	<ul style="list-style-type: none"> EPRs SW1, SW3 to SW7, SW9 to SW11 and SW13
Sustainability and Climate Change	<ul style="list-style-type: none"> EPRs SCC4 and SCC5
Traffic and Transport	<ul style="list-style-type: none"> EPRs T2, T4 and T5

4. Audit Findings and Corrective Actions

The audit findings raised during the Reporting Period are for each Freeway Package and other audits conducted by the FIEA are summarised in the following sections, together with the status of actions taken to address the audit findings within the Report Period.

4.1 North Package

The findings raised during the FIEA Compliance Audit Program conducted on the North Package (M80RRA) for the Reporting Period and the close out of those findings within the Reporting Period are summarised in Table 4.1.

Table 4.1 – North Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0
AFI	0	1	1	0
Observation	0	7	4	3
Total	0	8	5	3

A total of eight (8) audit findings were raised during the Reporting Period, comprising one (1) AFI and seven (7) Observations. No Non-compliances were raised.

During the Reporting Period, corrective actions undertaken by M80RRA resulted in the closure of the one (1) AFI and four (4) Observations.

Three (3) Observations remained open at the end of the Reporting Period. Corrective actions, where undertaken by the M80RRA, to address the Observations that remain open at the end of the Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period.

Audit findings with respect to the compliance status of Program activities and the close out of those findings against the EMF and EPRs assessed during the Reporting Period are summarised in Table 4.2.

Table 4.2: Compliance status of North Package activities with EMF and EPRs audited during Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
EMF and EMF EPRs	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF1, EMF2 and EMF4 	<ul style="list-style-type: none"> Compliant, with three (3) Observations raised against EPR EMF2 	<ul style="list-style-type: none"> Two (2) Observations closed One (1) Observation remains open
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1 	<ul style="list-style-type: none"> Compliant 	-
Air Quality	<ul style="list-style-type: none"> EPRs AQ1 and AQ6 	<ul style="list-style-type: none"> Compliant 	-
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3 	<ul style="list-style-type: none"> Compliant, with two (2) Observations raised; one against EPR AR1 and one against EPR AR2 	<ul style="list-style-type: none"> EPR AR1 Observation closed EPR AR2 Observation remains open
Business	<ul style="list-style-type: none"> EPRs B1, B4 and B6 	<ul style="list-style-type: none"> Compliant 	-
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5 	<ul style="list-style-type: none"> Compliant 	-
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF10 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR FF3 	<ul style="list-style-type: none"> Observation closed
Ground Movement	<ul style="list-style-type: none"> EPR GM3 	<ul style="list-style-type: none"> Compliant 	-
Groundwater	<ul style="list-style-type: none"> EPR GW2 and GW4 	<ul style="list-style-type: none"> Compliant 	-
Historical Heritage	<ul style="list-style-type: none"> EPR HH1 and HH2 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPR LP5 	<ul style="list-style-type: none"> Compliant 	-
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV2 and LV3 	<ul style="list-style-type: none"> Compliant 	-
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV1, NV3 to NV6, NV8 to NV10, NV13 to NV15 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR NV5 	<ul style="list-style-type: none"> Observation remains open
Social and Community	<ul style="list-style-type: none"> EPRs SC1 to SC3, SC5 and SC6 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR SC3 	<ul style="list-style-type: none"> AFI closed

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Surface Water	• EPRs SW1, SW3 to SW8, SW10, SW12 and SW13	• Compliant	-
Sustainability and Climate Change	• EPRs SCC1 to SCC5	• Compliant	-
Traffic and Transport	• EPRs T2, T3 and T5	• Compliant	-

North Package (M80RRA) activities were considered to be compliant with the 69 EPRs audited across the Reporting Period, given that no Non-compliances were identified.

4.2 South Package

The findings raised during the FIEA Compliance Audit Program conducted on the South Package (EFBTA) for the Reporting Period and the close out of those findings within the Reporting Period are summarised in Table 4.3.

Table 4.3 – South Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	4	3	1
Areas for Improvement	0	4	1	3
Observation	3 ⁶	4	5	2
Total	3	12	9	6

⁶ Prior to the FIEA being engaged, the CP IREA completed a single compliance audit assessing implementation of EFBTA’s *WEMP - Site Investigation*. Three (3) observations were raised during this audit and were consequently open at the beginning of the FIEA Reporting Period as closure had not previously been subject to IEA assessment.

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A total of 12 audit findings were raised during the Reporting Period, comprising four (4) Non-compliances, four (4) AFIs and four (4) Observations. Three (3) Observations remained open at the beginning of the Reporting Period; these were raised during a single compliance audit conducted by the CP IREA, prior to the FIEA being engaged, assessing implementation of EFBTA’s *WEMP - Site Investigation*.

During the Reporting Period, corrective actions undertaken by EFBTA resulted in the closure of three (3) of the Non-compliances, one (1) AFI and five (5) Observations.

One (1) Non-compliances, three (3) AFIs and two (2) Observations remained open at the end of the Reporting Period. Corrective actions, where undertaken by the EFBTA, to address the Observations that remain open at the end of the Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period.

The Reporting Period’s audit findings with respect to the compliance status of Program activities and the close out of those findings against the EMF and EPRs assessed during the Reporting Period are summarised in Table 4.4.

Table 4.4: Compliance status of South Package activities with EMF and EPRs audited during Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
EMF and EMF EPRs	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF1, EMF2 and EMF4 	<ul style="list-style-type: none"> Non-compliance with EMF - Statutory approvals and consents Compliant with EPRs EMF1, EMF2 and EMF4: <ul style="list-style-type: none"> two (2) Observations raised against EPR EMF2 during the Reporting Period; and, two (2) Observations against EPR EMF2 open at beginning of Reporting Period. 	<ul style="list-style-type: none"> Non-compliance with EMF - Statutory approvals and consents closed Two (2) Observations open at beginning of Reporting Period both closed Two (2) Observations raised against EPR EMF2 during the Reporting Period remain open
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1 	<ul style="list-style-type: none"> Compliant 	-
Air Quality	<ul style="list-style-type: none"> EPRs AQ1 and AQ6 	<ul style="list-style-type: none"> Compliant 	-
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3 	<ul style="list-style-type: none"> Compliant with one (1) Observation raised against EPR AR1 	<ul style="list-style-type: none"> EPR AR1 Observation closed
Business⁷	-	-	-

⁷ No Business EPRs were assessed during the Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5 	<ul style="list-style-type: none"> Compliant with EPRs CL2, CL3 and CL5 with one (1) AFI raised against EPR CL5 One (1) Non-compliance raised against EPR CL1 One (1) Observation against EPR CL1 open at beginning of Reporting Period One (1) Non-compliance raised against EPR CL4 	<ul style="list-style-type: none"> EPR CL4 Non-compliance closed EPR CL1 Observation closed EPR CL1 Non-compliance remains open EPR CL5 AFI remains open
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF6, FF8 and FF9 	<ul style="list-style-type: none"> Compliant with EPRs FF2 to FF6, FF8 and FF9 One (1) Non-compliance raised against EPR FF1 	<ul style="list-style-type: none"> EPR FF1 Non-compliance closed
Ground Movement⁸	-	-	-
Groundwater	<ul style="list-style-type: none"> EPR GW1 to GW4 	<ul style="list-style-type: none"> Compliant 	-
Historical Heritage	<ul style="list-style-type: none"> EPR HH1 and HH4 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPRs LP1 and LP3 	<ul style="list-style-type: none"> Compliant 	-
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV2 and LV3 	<ul style="list-style-type: none"> Compliant 	-
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV1, NV3 to NV5, NV8, NV9, and NV13 to NV15 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> -
Social and Community	<ul style="list-style-type: none"> EPRs SC1 and SC3 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> -
Surface Water	<ul style="list-style-type: none"> EPRs SW1, SW3 to SW9 and SW14 	<ul style="list-style-type: none"> Compliant with one (1) Observation raised against EPR SW3 and three (3) AFIs raised against EPR SW5 	<ul style="list-style-type: none"> One (1) AFI and the Observation have both been closed Two (2) AFIs remains open

⁸ No Ground Movement EPRs were assessed during the Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Sustainability and Climate Change	<ul style="list-style-type: none"> EPRs SCC1, SCC2, SCC4 and SCC5 	<ul style="list-style-type: none"> Compliant 	-
Traffic and Transport⁹	-	-	-

The South Package (EFBTA) activities were considered to be Compliant with 53 of the 56 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these 53 EPRs. However, Non-compliance findings were raised against the remaining three (3) EPRs namely EPR CL1, EPR CL4 and EPR FF1, and also against EMF Section 3. *Statutory Approvals and Consents*. Summaries of the Non-compliance findings identified during the Reporting Period are provided in Table 4.5.

Table 4.5: South Package Non-compliance findings

EPR Topic	Compliance Status	Close-out Status
EMF Statutory approvals and consents	<ul style="list-style-type: none"> The <i>WEMP Site Investigation and Site Establishment</i> had not been provided to the Department of Transport as required under the 'Approval for works within the road corridor'. 	<ul style="list-style-type: none"> Closed
Contamination and Soil EPR CL1	<ul style="list-style-type: none"> The <i>WEMP West mainline Stage 1A Zone:5200</i> required spoil stockpiles to be separated by material type and clearly signposted, although the audit identified that sign posting had not been provided. 	<ul style="list-style-type: none"> Open
Contamination and Soil EPR CL4	<ul style="list-style-type: none"> The <i>Freeway Golf Course Construction Compound WEMP</i> required landfill gas monitoring during all excavation works within and adjacent the known landfill areas, although landfill gas monitoring had not been undertaken. In closing the finding, EFBTA provided gas monitoring information which identified that landfill gas emissions presented a low risk, with no methane detected and negligible flow detected in all monitoring wells. 	<ul style="list-style-type: none"> Closed
Flora and Fauna EPR FF1	<ul style="list-style-type: none"> A portion of protective / No Go Zone fencing at the Bulleen Interchange was not in place at the time of the audit. 	<ul style="list-style-type: none"> Closed

Three (3) of the Non-compliance findings were closed during the Reporting Period. The Non-compliant finding against EPR CL1, which was raised during the Monthly Environmental

⁹ No Traffic and Transport EPRs were assessed during the Reporting Period

Performance Compliance Audit conducted on 24 April 2024 (i.e., at the end of the Reporting Period), remained open.

4.3 East Package

At the time of the Reporting Period, the East Package was under tender evaluation and consequently FIEA Compliance Audits were not conducted.

4.4 West Package

At the time of the Reporting Period, the West Package was under tender evaluation and consequently FIEA Compliance Audits were not conducted.

4.5 Other FIEA Compliance Audits

4.5.1 Project-wide EPRs (MRPV)

The findings raised during the FIEA Compliance Audit Program conducted on the Project-wide EPRs for which MRPV is fully or partially responsible for the Reporting Period (i.e., one (1) EPR Compliance Audit) and the close out of those findings within the Reporting Period are summarised in Table 4.6.

Table 4.6 – Project-wide EPRs (MRPV) Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0
Areas for Improvement	0	0	0	0
Observation	0	1	1	0
Total	0	1	1	0

One (1) audit finding was raised during the Reporting Period, comprising an Observation. No Non-compliances or AFIs were raised.

During the Reporting Period, MRPV provided consideration against the Observation such that it was closed in light of the EMF requirements.

The Reporting Period’s audit findings with respect to the compliance status of MRPV’s activities and the close out of those findings against the Project-wide EPRs assessed during the Reporting Period are summarised in Table 4.7.

Table 4.7: Compliance status of MRPV’s activities with Project-wide EPRs audited during Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Air Quality¹⁰	-	-	-
Arboriculture	<ul style="list-style-type: none"> EPR AR3 (shared responsibility) 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised 	Observation closed
Flora and Fauna	<ul style="list-style-type: none"> EPR FF2 (shared responsibility) EPRs FF7 and FF10 (State only responsibility) 	<ul style="list-style-type: none"> Compliant 	-
Groundwater	<ul style="list-style-type: none"> EPR GW2 (shared responsibility) 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPR LP5 (shared responsibility) 	<ul style="list-style-type: none"> Compliant 	-
Noise and Vibration¹¹	-	-	-
Social and Community	<ul style="list-style-type: none"> EPRs SC3, SC4 and SC5 (shared responsibility) EPRs SC7 and SC8 (State only responsibility) 	<ul style="list-style-type: none"> Compliant 	-
Surface Water	<ul style="list-style-type: none"> EPR SW15 (shared responsibility) 	<ul style="list-style-type: none"> Compliant 	-
Traffic and Transport	<ul style="list-style-type: none"> EPR T3 (shared responsibility) 	<ul style="list-style-type: none"> Compliant 	-

MRPV’s activities were considered to be compliant with the 13 Project-wide EPRs audited across the Reporting Period, for which MRPV is either fully or partially responsible, given that no Non-compliances were identified.

¹⁰ EPR AQ4 (State only responsibility) – not triggered during the Reporting Period and consequently not audited

¹¹ EPR NV2 (shared responsibility) – not triggered during the Reporting Period and consequently not audited

4.5.2 Indara Tower Relocation Works

The findings raised during the FIEA Compliance Audit Program conducted on the Indara Tower Relocation Works for the Reporting Period (i.e., one (1) EMF and EPR Compliance Audit) and the close out of those findings within the Reporting Period are summarised in Table 4.8.

Table 4.8 – Indara Tower Relocation Works Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised During Reporting Period	Closed During Reporting Period	Open at end of Reporting Period
Non-Compliance	0	5	5	0
Areas for Improvement	0	1	1	0
Observation	0	6	4	2
Total	0	12	10	2

A total of 12 audit findings were raised during the Reporting Period, comprising five (5) Non-compliances, one (1) AFI and six (6) Observations.

During the Reporting Period, corrective actions undertaken by MRPV and Indara resulted in the closure of: all five (5) Non-compliances; one (1) AFI; and, two (2) Observations.

Two (2) Observations remained open at the end of the Reporting Period. Corrective actions, where undertaken by MRPV and Indara, to address the Observations that remain open at the end of the Reporting Period will be assessed by the FIEA through review of evidence to be provided during the next Reporting Period, given the works have been completed and no further compliance audits are scheduled to be conducted.

The Reporting Period’s audit findings with respect to the compliance status of Program activities and the close out of those findings against the EMF and EPRs assessed during the Reporting Period are summarised in Table 4.9.

Table 4.9: Compliance status of Indara Tower Relocation Works with EMF and EPRs audited during Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
EMF	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF1 to EMF4 	<ul style="list-style-type: none"> Compliant with EPRs EMF1, EMF3 and EMF4 Two (2) Non-compliances and two (2) Observations raised against EPR EMF2 	<ul style="list-style-type: none"> Both EPR EMF2 Non-compliances closed; Two (2) Observations closed
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1 	<ul style="list-style-type: none"> Compliant 	-
Air Quality	<ul style="list-style-type: none"> EPRs AQ1 and AQ6 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR AQ1 	<ul style="list-style-type: none"> Observation closed
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR AR2 	<ul style="list-style-type: none"> Observation remains open
Business	<ul style="list-style-type: none"> EPRs B1 and B4 to B8 	<ul style="list-style-type: none"> Compliant 	-
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR CL5 	<ul style="list-style-type: none"> AFI closed
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF3 and FF5 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR FF3 	<ul style="list-style-type: none"> Observation remains open
Ground Movement¹²	-	-	-
Groundwater	<ul style="list-style-type: none"> EPR GW2 and GW4 	<ul style="list-style-type: none"> Compliant 	-
Historical Heritage	<ul style="list-style-type: none"> EPR HH1 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPRs LP1 to LP3 	<ul style="list-style-type: none"> Compliant 	-
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV1 to LV4 	<ul style="list-style-type: none"> Compliant 	-
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV3 to NV5, NV8, NV9, NV14 and NV15 	<ul style="list-style-type: none"> Compliant, with EPRs NV4, NV5, NV8, NV9, NV14 and NV15 One (1) Non-compliance raised against EPR NV3 	<ul style="list-style-type: none"> EPR NV3 Non-compliance closed
Social and Community	<ul style="list-style-type: none"> EPRs SC1 to SC4 and SC7 	<ul style="list-style-type: none"> Compliant 	-

¹² Not applicable – no EPRs relevant to the Indara Tower Relocation Works

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Surface Water	<ul style="list-style-type: none"> EPRs SW1, SW3 to SW7, SW9 to SW11 and SW13 	<ul style="list-style-type: none"> Compliant, with EPRs SW1, SW4, SW6, SW7, SW9 to SW11 and SW13 Two (2) Non-compliances raised; one (1) against EPR SW3; and one (1) against EPR SW5 	<ul style="list-style-type: none"> Both Non-compliances closed
Sustainability and Climate Change	<ul style="list-style-type: none"> EPRs SCC4 and SCC5 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR SCC4 	<ul style="list-style-type: none"> Observation closed
Traffic and Transport	<ul style="list-style-type: none"> EPRs T2, T4 and T5 	<ul style="list-style-type: none"> Compliant 	-

The Indara Tower Relocation Works were considered to be compliant with 58 of the 62 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these EPRs. However, Non-compliance findings were raised against four (4) EPRs, namely EPR EMF2 (two (2) findings), EPR NV3, EPR SW3 and EPR SW5. Summaries of the Non-compliance findings identified during the Reporting Period are provided in Table 4.10.

Table 4.10: Indara Tower Relocation Works Non-compliance findings

EPR Topic	Compliance Status	Close-out Status
Environmental Management Framework EPR EMF2	<ul style="list-style-type: none"> The CEMP required all plant and vehicles to be equipped with a fire extinguisher. Whilst haulage trucks were equipped with fire extinguishers, smaller items of mobile plant (e.g., excavators) were not. 	<ul style="list-style-type: none"> Closed
Environmental Management Framework EPR EMF2	<ul style="list-style-type: none"> The CEMP required that the Flora and Fauna Management Plan (FFMP) sub-plan be provided to relevant land managers and municipal councils. Whilst meetings were held with the land manager and Manningham Council, the FFMP sub-plan had not been provided. 	<ul style="list-style-type: none"> Closed
Noise and Vibration EPR NV3	<ul style="list-style-type: none"> The Construction Noise and Vibration Management Plan (CNVMP) required 2.1 m high, solid and continuous hoarding to be installed along the eastern boundary of the new tower worksite, although the temporary fence installed did not meet these requirements. 	<ul style="list-style-type: none"> Closed

EPR Topic	Compliance Status	Close-out Status
Surface Water EPR SW3	<ul style="list-style-type: none"> Soil tracked onto the car park area surrounding the worksite was cleaned by washing down the car park rather than utilising a street sweeper. Wastewater arising from washdown was discharged to a grassed area to the east of Koonung Creek without approval from the relevant authority prior to discharge. 	<ul style="list-style-type: none"> Closed
Surface Water EPR SW5	<ul style="list-style-type: none"> The Surface Water Management Plan (SWMP) required sediment and erosion controls remain in place until revegetation, stabilisation or hardscaping had occurred. The audit observed that erosion and sediment controls had been removed from site whilst the disturbed areas around the tower pad remained unvegetated. 	<ul style="list-style-type: none"> Closed

The five (5) Non-compliance findings and the Indara Tower Relocation Works were all closed and completed, respectively, during the Reporting Period.

5. Overall Compliance

5.1 North Package

The FIEA audited 69 of the 94 EPRs relevant to the North Package (M8ORRA) activities during the Reporting Period across four (4) compliance audits.

North Package (M8ORRA) activities were considered to be Compliant with the 69 EPRs covered by the scope of the compliance audits conducted in the Reporting Period as summarised in Table 4.1, given that no Non-Compliances were identified.

Whilst a single AFI and seven (7) Observations were raised during the Reporting Period Audits, M8ORRA has addressed and closed-out the AFI and four (4) of the Observation findings identified during the Reporting Period.

5.2 South Package

The FIEA audited 56 of the 87 EPRs relevant to the South Package (EFBTA) activities during the Reporting Period across four (4) compliance audits.

The South Package (EFBTA) activities were considered to be Compliant with 53 of the 56 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these 53 EPRs. However, four (4) Non-compliance findings were raised against the remaining three (3) EPRs and against EMF Section 3. *Statutory Approvals and Consents*.

Three (3) of the Non-compliance findings were closed during the Reporting Period. One (1) Non-compliance finding against EPR CL1 remained open. This was associated with lack of signposts for spoil stockpiles and was raised during the Monthly Environmental Performance Compliance Audit conducted on 24 April 2024 (i.e., at the end of the Reporting Period). The FIEA will assess corrective actions undertaken by EFBTA to close this finding during the next audit to be conducted in the next Reporting Period.

The IEA does not consider that the audit findings closed during the Reporting Period represent systemic issues or present significant or ongoing material risks to the environment. The Non-compliance finding which remained open at the end of the Reporting Period will require appropriate corrective action to manage and control environmental risks.

5.3 East Package

At the time of the Reporting Period, the East Package was under tender with works yet to commence.

5.4 West Package

At the time of the Reporting Period, the West Package was under tender with works yet to commence.

5.5 Other FIEA Compliance Audits

5.5.1 Project-wide EPRs (MRPV)

During the Reporting Period, the single Project-wide EPR compliance audit conducted by the FIEA audited all 13 Project-wide EPRs (for which MRPV is fully or partially responsible) that are currently triggered by the Program, and for which the FIEA is responsible for auditing.

MRPV's activities were considered to be compliant with the 13 EPRs covered by the scope of the Project-wide EPR compliance audit conducted in the Reporting Period as summarised in Table 4.5 given that no Non-compliances were identified.

Whilst a single Observation was raised during the Reporting Period, MRPV provided consideration against the Observation such that it was closed in light of the EMF requirements.

5.5.2 Indara Tower Relocation Works

The FIEA audited all 62 EPRs relevant to the Indara Tower Relocation Works activities during the single compliance audit conducted in the Reporting Period.

The Indara Tower Relocation Works were considered to be Compliant with 58 of the 62 EPRs audited across the Reporting Period, given that no Non-compliances were identified against these EPRs. However, five (5) Non-compliance findings were raised against four (4) EPRs. The five (5) Non-compliance findings and the Indara Tower Relocation Works were all closed and completed, respectively, during the Reporting Period. In addition, all but two (2) Observations were also closed during the Reporting Period.

Given the Indara Tower Relocation Works have been completed and based on MRPV's and Indara's responsiveness in closing out findings identified during the Reporting Period, other than two (2) Observations which remain open, the FIEA does not consider that the audit findings represent systemic issues or present significant or ongoing material risks to the environment.



Appendix A – EPRs Audited During the Reporting Period

Appendix A1 - North Package

The following table provides an overview of the EPRs covered within the scope of the FIEA Compliance Audit program for M80RRA within the Reporting Period:

EPR Topic	EPRs relevant to the Freeway Package and assessed during the Reporting Period	EPRs relevant to the Freeway Package but not assessed during the Reporting Period	EPRs not relevant to/triggered by the Freeway Package during the Reporting Period
Environmental Management (EMF)	EMF1, EMF2, EMF4	-	EMF3
Aboriginal Heritage (AH)	AH1	-	-
Air Quality (AQ)	AQ1, AQ6		AQ2, AQ3, AQ4, AQ5
Arboriculture (AR)	AR1, AR2, AR3	-	
Business (B)	B1, B4, B6	B7, B8	B2, B3
Contamination and soil (CL)	CL1, CL2, CL3, CL4, CL5	-	CL6
Flora and Fauna (FF)	FF1, FF2, FF3, FF4, FF5, FF6, FF7, FF8, FF9, FF10	-	-
Ground Movement (GM)	GM3	GM1, GM2, GM4	-
Groundwater (GW)	GW2, GW4	GW1, GW3	GW5
Historical Heritage (HH)	HH1, HH2	HH3, HH4, HH5	-
Land Use Planning (LP)	LP5	LP1, LP2, LP3, LP4	-
Landscape and Visual (LV)	LV2, LV3	LV1, LV4	-
Noise and Vibration (NV)	NV1, NV3, NV4, NV5, NV6, NV8, NV9, NV10, NV13, NV14, NV15	-	NV2, NV7, NV11, NV12, NV16
Social and Community (SC)	SC1, SC2, SC3, SC5, SC6	SC4	SC7, SC8
Surface Water (SW)	SW1, SW3, SW4, SW5, SW6, SW7, SW8, SW10, SW12, SW13	SW2, SW9, SW11, SW14, SW15	-
Sustainability and Climate Change (SCC)	SCC1, SCC2, SCC3, SCC4, SCC5	-	-
Traffic and Transport (TT)	T2, T3, T5	T1, T4	-

Appendix A2 - South Package

The following table provides an overview of the EPRs covered within the scope of the FIEA Compliance Audit program for EFBTA within the Reporting Period:

EPR Topic	EPRs relevant to the Freeway Package and assessed during the Reporting Period	EPRs relevant to the Freeway Package but not assessed during the Reporting Period	EPRs not relevant to the Freeway Package during the Reporting Period
Environmental Management (EMF)	EMF1, EMF2, EMF4	-	EMF3
Aboriginal Heritage (AH)	AH1	-	-
Air Quality (AQ)	AQ1, AQ6	-	AQ2, AQ3, AQ4, AQ5
Arboriculture (AR)	AR1, AR2, AR3	-	-
Business (B)	-	B1, B4, B5, B6, B7, B8	B2, B3
Contamination and soil (CL)	CL1, CL2, CL3, CL4, CL5	-	CL6
Flora and Fauna (FF)	FF1, FF2, FF3, FF4, FF5, FF6, FF8, FF9	-	FF7, FF10
Ground Movement (GM)	-	GM1, GM2, GM3, GM4	-
Groundwater (GW)	GW1, GW2, GW3, GW4	-	GW5
Historical Heritage (HH)	HH1, HH4	HH2, HH5	HH3
Land Use Planning (LP)	LP1, LP3	LP2, LP4	LP5
Landscape and Visual (LV)	LV2, LV3	LV1, LV4	-
Noise and Vibration (NV)	NV1, NV3, NV4, NV5, NV8, NV9, NV13, NV14, NV15	-	NV2, NV6, NV7, NV10, NV11, NV12, NV16
Social and Community (SC)	SC1, SC3	SC2, SC4, SC5, SC6	SC7, SC8
Surface Water (SW)	SW1, SW3, SW4, SW5, SW6, SW7, SW8, SW9, SW14	SW2, SW10, SW11, SW12, SW13, SW15	-
Sustainability and Climate Change (SCC)	SCC1, SCC2, SCC4, SCC5	-	SCC3
Traffic and Transport (TT)	-	T1, T2, T3, T4, T5	-

Appendix A3 - Project-wide EPRs (MRPV)

Refer to Tables 3.7 and 4.7 for details of the 13 Project-wide EPRs relevant and assessed during the Reporting Period. Two (2) Project-wide EPRs were not triggered during the Reporting Period:

- Air Quality EPR AQ4; and,
- Noise and Vibration EPR NV2.

No other Project-wide EPRs, for which MRPV is fully or partially responsible, are relevant to the FIEA audit activities.

Appendix A4 - Indara Tower Relocation Works

The following table provides an overview of the EPRs covered within the scope of the FIEA Compliance Audit program for the Indara Tower Relocation Works within the Reporting Period:

EPR Topic	EPRs relevant to the Freeway Package and assessed during the Reporting Period	EPRs relevant to the Freeway Package but not assessed during the Reporting Period	EPRs not relevant to/triggered by the Freeway Package during the Reporting Period
Environmental Management (EMF)	EMF1, EMF2, EMF3, EMF4	-	-
Aboriginal Heritage (AH)	AH1	-	-
Air Quality (AQ)	AQ1, AQ6	-	AQ2, AQ3, AQ4, AQ5
Arboriculture (AR)	AR1, AR2, AR3	-	-
Business (B)	B1, B4, B5, B6, B7, B8	-	B2, B3
Contamination and soil (CL)	CL1, CL2, CL3, CL4, CL5	-	CL6
Flora and Fauna (FF)	FF1, FF2, FF3, FF5	-	FF4, FF6, FF7, FF8, FF9, FF10
Ground Movement (GM)	-	-	GM1, GM2, GM3, GM4
Groundwater (GW)	GW2, GW4	-	GW1, GW3
Historical Heritage (HH)	HH1	-	HH2, HH3, HH4, HH5
Land Use Planning (LP)	LP1, LP2, LP3	-	LP4, LP5
Landscape and Visual (LV)	LV1, LV2, LV3, LV4	-	
Noise and Vibration (NV)	NV3, NV4, NV5, NV8, NV9, NV14, NV15	-	NV1, NV2, NV6, NV7, NV10, NV11, NV12, NV13, NV16
Social and Community (SC)	SC1, SC2, SC3, SC4, SC7	-	SC5, SC6, SC8
Surface Water (SW)	SW1, SW3, SW4, SW5, SW6, SW7, SW9, SW10, SW11, SW13	-	SW2, SW8, SW12, SW14, SW15
Sustainability and Climate Change (SCC)	SCC4, SCC5	-	SCC1, SCC2, SCC3
Traffic and Transport (TT)	T2, T4, T5	-	T1, T3



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