

North East Link Program – Central Package

IEA Six-Monthly Summary Environmental Compliance Report – May to October 2024

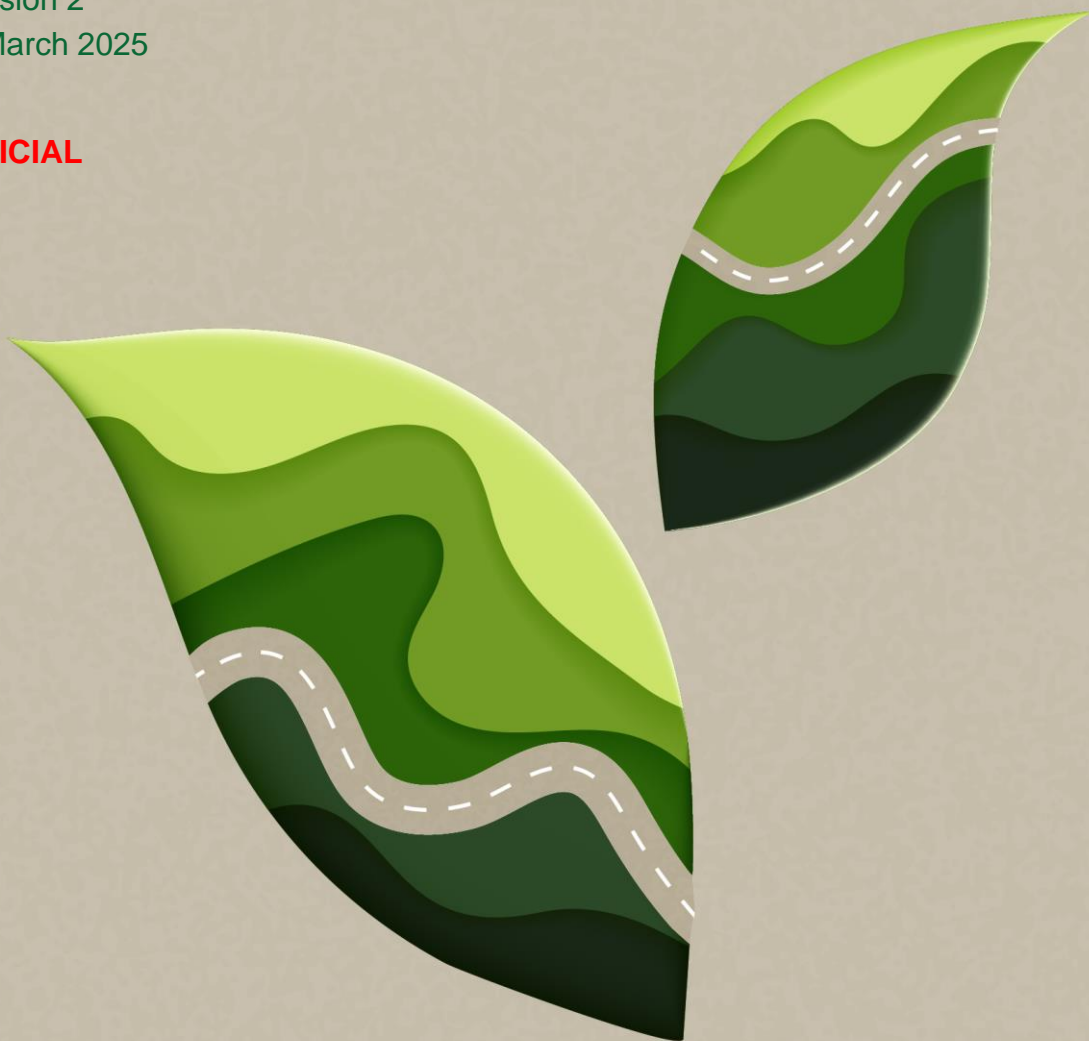
A Report to the Minister for Planning

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OFFICIAL





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Abbreviations

AAAJV	APP Arup Aurecon Joint Venture
AHMP	Archaeology & Heritage Management Plan
AsMP	Asbestos Management Plan
BDMP	Business Disruption Mitigation Management Plan
BIZ	Bulleen Industrial Zone
CCEMP	Communication and Community Engagement Management Plan
CCP	Construction Compound Plan
CEMP	Construction Environmental Management Plan
CHDDA	Cultural Heritage Due Diligence Assessment
CNVIA	Construction Noise and Vibration Impact Assessment
CNVMP	Construction Noise and Vibration Management Plan
CP	Central Package
DAQMMP	Dust and Air Quality Management and Monitoring Plan
D&C	Design and Construct
DCN	Design Change Notice
EA	Environmental Auditor
EBTA	North East Link - Eastern Freeway Upgrade - Burke Road to Tram Road
EcMP	Ecology Management Plan
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMS	Environmental Management System
EMMP	Environmental Monitoring Management Plan
EPA	Environment Protection Authority
EPR	Environmental Performance Requirements
ERS	Environmental Reference Standard
ERSED	Erosion and Sediment (Control Plan)



FEMP	Flood Emergency Management Plan
FP	Freeway Package(s)
GI(M)P	Green Infrastructure (Management) Plan
GMMP	Ground Movement Management Plan
GSRISP	Green Star Rating Implementation Sub-Plan
GWMP	Groundwater Management Plan
HIR	Hydro-Interpretive Report
IEA	Independent Environmental Auditor
IFU	Issued for Use
IR	Independent Reviewer
IREA	Independent Reviewer and Environmental Auditor
ISRISP	Infrastructure Sustainability Rating Implementation Sub-Plan
M80	Upgrade of the M80 Ring Road and connection to the NELP CP works
MAT	Monitoring Action Team
MP	Management Plan
NCR	Non Conformance Report
NDD	Non Destructive Drilling
NELP	North East Link Program
OEMP	Operational Environmental Management Plan
OOH	Out of hours
OSD	On Site Detention
PCo	(Spark) Project Company
PSDR	Project Scope and Delivery Requirements
SEM	Sequential Excavation Method
SEP	Site Environment Plan
SMP	Sustainability Management Plan
SP	Secondary Package
SpMP	Spoil Management Plan



SRD	Southern Road Diversion (Bulleen)
SWMP	Surface Water Management Plan
SYSNCR	System NCR (raised in the Spark D&C internal system)
TN	Trinity North (Bulleen Cut and Cover)
TPZ	Tree Protection Zone
TMP	Transport Management Plan
TRP	Tree Removal Plan
TS	Trinity South (Bulleen Cut and Cover)
TPZ	Tree Protection Zone
UDLP	Urban Design Landscape Plan
WASSMP	Waste Acid Sulfate Soils Management Plan



Summary

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

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

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

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

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from May - October 2024.

The State (through the North East Link Program) is responsible for the implementation of some EPRs.

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

Key Documents	May 24	June 24	July 24	Aug 24	Sept 24	October 24
EPRs (as scheduled)		✓			✓	
Environmental Strategy					✓	
Construction Environmental Management Plan		✓ (key elements)			✓ (all applicable elements)	
Management Plans required by the EPRs		✓			✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)	✓ (CCP-0013)	✓ (CCP-0009)				✓ (CCP-0004)



A total of forty-nine (49) audit findings were raised comprising four (4) Non-compliances, twenty-three (23) Areas for Improvement, and twenty-two (22) Observations. Fifty-eight (58) findings were closed during the reporting period. Twelve (12) findings remained open at the end of the reporting period.

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	5	4	6	3
Afl	10	23	26	7
O	6	22	26	2
Total	21	49	58	12

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

The audit findings trends over the last two reporting periods show that Spark’s documented environmental management arrangements have been revised to better reflect actual environmental management processes, and Spark’s implementation of these processes has improved. The number of audit findings against the process documents (Environment Strategy, CEMP, and Sub-Plans) has remained largely steady. Findings against the WEMPs, which largely manage on ground environmental controls, decreased slightly compared to the previous reporting period.

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

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

The IEA has reviewed the required Plans for compliance with the Project environmental requirements separately from the audits.

See below for compliance with the EPRs and the Management Plans.

Compliance with Environmental Performance Requirements

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

Fifty-eight (58) of the EPRs for which Spark is responsible were audited in the reporting period, with GW4 audited twice. Five (5) findings were raised against the requirements of the EPRs; one (1) Area for Improvement and four (4) Observations. These findings related to chemical storage, unneeded lighting during the day, and project parking. Seven (7) findings were closed, and no findings remained open at the end of the reporting period.

Implementation of the Environmental Strategy

One new finding was raised against the requirements of the Environment Strategy during the reporting period. One previous finding was closed.



Implementation of the Construction Environmental Management Plan

Six (6) new findings were raised against the requirements of the CEMP; no (0) Non-compliances, five (5) Areas for Improvement, and one (1) Observation. The findings were largely process related.

Seven (7) findings were closed and four (4) remained open at the end of the period.

Compliance with the Requirements of the Worksite Environmental Management Plans

Twenty-seven (27) findings were raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, ten (10) Areas for Improvement, and fifteen (15) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. In particular, controls related to dust generation, sediment control, and tracking of mud on to roads were not always adequate.

Twenty-eight (28) findings were closed, and seven (7) remained open.

Compliance with the Requirements of the Management Plans

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

Ten (10) new findings were raised during the reporting period; two (2) Non-compliances, six (6) Areas for Improvement, and two (2) Observations. One Non-compliance related to management of out of hours works. The other Non-compliance was related to unpermitted dewatering. The remaining findings related to inadequate environmental controls at some works areas, and to unsatisfactory implementation of documented environmental management arrangements.

Fifteen (15) findings were closed in the reporting period, and none (0) remained open.

Compliance with the Requirements of the Construction Compound Plans

No new findings were raised against the requirements of CCPs.



1 Background to the audits

1.1 The North East Link Program

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

The North East Link Program (NEL) includes:

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

The Central Package Scope of Works includes:

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

Figure 1 shows an outline of the NEL works.

This report is applicable to the D&C works for the Central Package from the Northern Portal to the Southern Portal.

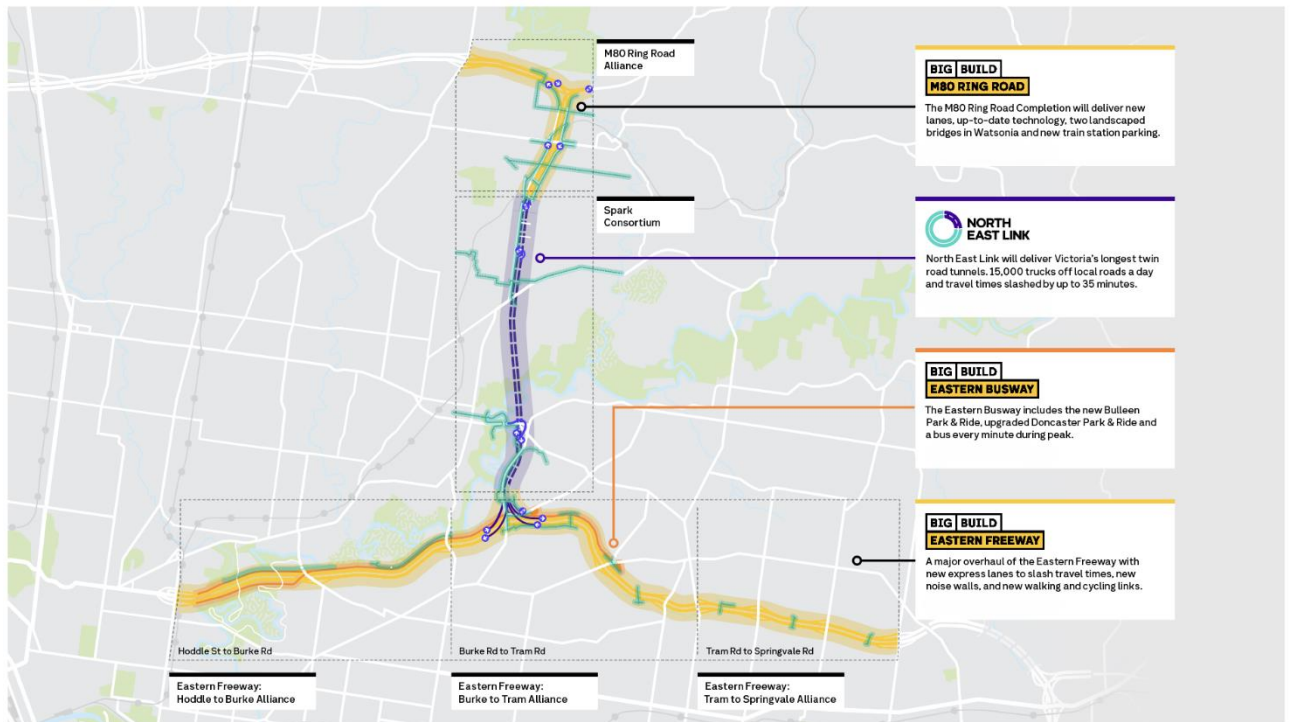


Figure 1: Schematic of the NEL works

1.2 NEL works

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

Package Wide

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



Northern

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

Southern

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

Tunnels

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

1.3 Purpose of this report

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from May to October 2024.



2 Environmental Management Requirements

2.1 Environmental Management Framework

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

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

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

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

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

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

The EMF documentation is summarised below in Figure 2.

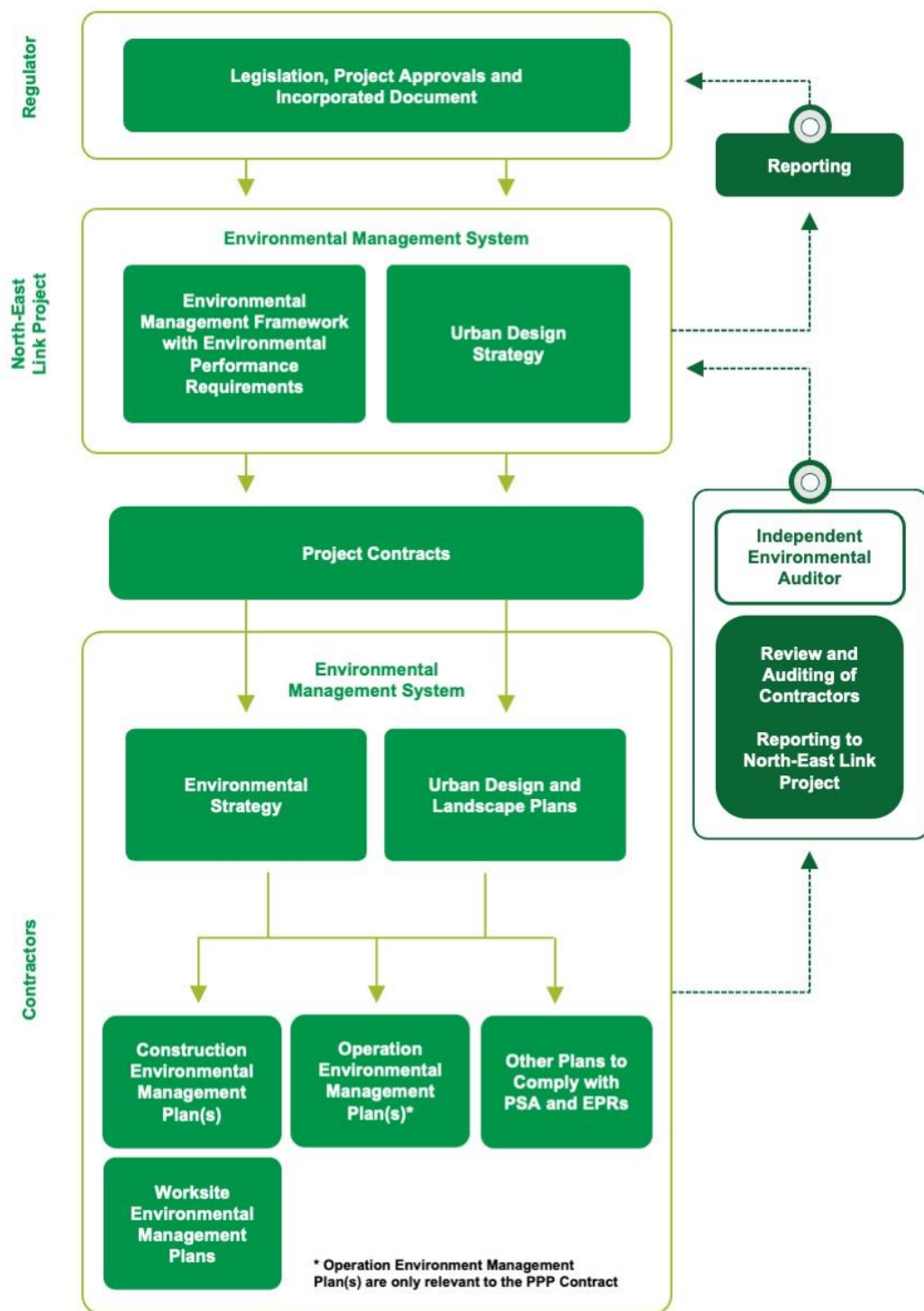


Figure 2: Environmental Documentation

(adapted from the EMF)



2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

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

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

2.3 Requirements of the EMF

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

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

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

2.3.1 Environmental Performance Requirements

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

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



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

Spark's activities and scope of works must comply with all relevant EPRs, as defined in the EMF and Table H17.1 of the PSDR (which replicates the EPRs and defines responsibilities for meeting them). Not all the requirements of the EPRs are applicable to every stage of the works, and not all the requirements are the responsibility of Spark. Of the 110 EPRs, Spark must comply with 104 of these in whole or part with 5 EPRs only applicable once construction is complete, and the road is operational.

The requirements applicable to Spark's D&C activities are considered in audit planning. All applicable EPRs are audited, taking a risk based approach, and all EPRs are audited at least once annually. Fifty-eight (58) of the EPRs for which Spark is responsible were audited in the reporting period.

2.4 Spark environmental documentation

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

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



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

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

- WEMPs. These are:
 - Worksite Environmental Management Plan – Ancillary Works
 - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
 - Worksite Environmental Management Plan – Watsonia Tunnels
 - Worksite Environmental Management Plan – Lower Plenty
 - Worksite Environmental Management Plan – Manningham
 - Worksite Environmental Management Plan – Bulleen.
- CCPs. These are:
 - Watsonia Construction Compound Plan – Vent Office Compound
 - Watsonia Construction Compound Plan – TBM Compound
 - Watsonia Construction Compound Plan – Civil and Roads Compound
 - Lower Plenty Construction Compound Plan – Structures Compound
 - Lower Plenty Construction Compound Plan – Mobilisation Compound
 - Manningham Construction Compound Plan – Mobilisation Compound
 - Manningham Construction Compound Plan – SEM Compound
 - Manningham Construction Compound Plan – Structural and M&E Compound
 - Bulleen Construction Compound Plan – Civil, Structural and Roads Compound
 - Bulleen Construction Compound Plan – Cut and Cover and SEM Compound
 - Winsor Reserve Construction Compound Plan – Spoil Handling Facility
 - Boral Batch Plant Construction Compound Plan
 - Manningham North Construction Compound Plan.



2.5 Role of the Independent Environmental Auditor

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

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



3 Audit activities

3.1 Environmental documentation verification

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

3.2 Audit program

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

- EPRs are audited at least annually (with more frequent audits for high-risk activities)
- The Environmental Strategy audited at least annually.
- The environmental management system elements of the CEMP to be audited six-monthly
- The elements of the CEMP critical to effective environmental management to be audited quarterly
- The applicable CEMP sub-plans and Management Plans required by the EPRs to be audited quarterly for higher risk environmental aspects and less frequently for lower risk environmental aspects.
- Applicable WEMPs and CCPs audit frequency based on construction activities and environmental risks.

3.3 Audit conduct

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

For audits of Spark D&C each audit includes:

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



Figure 3: Audit process

3.4 Audit objectives, scope, and criteria

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

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

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



Table 1: Summary audit scope

Key Documents	May 24	June 24	July 24	August 24	September 24	October 24
EPRs (as scheduled)		✓			✓	
Environmental Strategy					✓	
Construction Environmental Management Plan		✓ (key elements)			✓ (all applicable elements)	
Management Plans required by the EPRs		✓			✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)	✓ (CCP-0013)	✓ (CCP-0009)				✓ (CCP-0004)

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

3.5 Construction activities during the reporting period

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

Table 2: Construction activities during the reporting period.

Audit date	Construction activities
May 2024	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Excavation and spoil removal • Salvage and site investigation works at River Gum Walk as part of the Lower Plenty Shared User Path bridge installation • TBM assembly works • Operation of the Boral Batch Plant • Traffic management • Winsor Reserve: the spoil shed and ancillary equipment installation • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard.
June 2024	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Excavation and spoil removal • Salvage and site investigation works at Rivergum Walk as part of the Lower Plenty Shared User Path bridge installation • TBM assembly works including storage of tunnel segments at Watsonia • Operation of the Boral Batch Plant • Traffic management



Audit date	Construction activities
	<ul style="list-style-type: none"> Winsor Reserve: the spoil shed and ancillary equipment installation Drilling of geotechnical and groundwater investigation bores Installation and maintenance of environmental controls including water treatment plants Waste disposal Storage of plant, equipment and dangerous goods at the Trawalla logistics yard.
July 2024	<ul style="list-style-type: none"> Site civil works including road diversions Piling, D-Walling, and concrete pours Cut and Cover tunnelling Excavation and spoil removal Preparation for SEM and TBM tunnelling TBM assembly works including storage of tunnel segments at Watsonia Operation of the Boral Batch Plant Salvage and site investigation works at Rivergum Walk as part of the Lower Plenty Shared User Path bridge installation Traffic management Winsor Reserve: the spoil shed and ancillary equipment installation Drilling of geotechnical and groundwater investigation bores Installation and maintenance of environmental controls including water treatment plants Waste disposal Storage of plant, equipment and dangerous goods at the Trawalla logistics yard.
August 2024	<ul style="list-style-type: none"> Site civil works including road diversions Piling, D-Walling, and concrete pours Cut and Cover tunnelling Excavation and spoil removal Preparation for SEM and TBM tunnelling Preparation for the launch of TBM1, TBM2 assembly works, and storage of tunnel segments at Watsonia Operation of the Boral Batch Plant Salvage and site investigation works at Rivergum Walk as part of the Lower Plenty Shared User Path bridge installation Traffic management Winsor Reserve: the spoil shed and ancillary equipment installation Drilling of geotechnical and groundwater investigation bores Installation and maintenance of environmental controls including water treatment plants Waste disposal Storage of plant, equipment and dangerous goods at the Trawalla logistics yard.
September 2024	<ul style="list-style-type: none"> Site civil works including road diversions Piling, D-Walling, and concrete pours Cut and Cover tunnelling Excavation and spoil removal SEM tunnelling at Manningham and preparation for SEM tunnelling at Bulleen



Audit date	Construction activities
October 2024	<ul style="list-style-type: none"> • TBM tunnelling of the north bound tunnel and preparation to commence the south bound TBM tunnelling • Storage of tunnel segments at Watsonia • Operation of the Boral Batch Plant • Salvage and site investigation works at Rivergum Walk as part of the Lower Plenty Shared User Path bridge installation • Traffic management • Operation of the Winsor Reserve spoil shed and ancillary equipment • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard. <hr/> <ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the north bound tunnel and preparation to commence the south bound TBM tunnelling • Storage of tunnel segments at Watsonia • Operation of the Winsor Reserve spoil handling facility and ancillary equipment • Operation of the Boral Batch Plant • Utility works at Rivergum Walk as part of the Lower Plenty Shared User Path bridge installation • Traffic management • Drilling of geotechnical and groundwater investigation bores including installation of six groundwater bores south of the flood wall at Manningham • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard.



4 Audit outcomes

4.1 Audit findings classifications

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

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

4.1.1 Significance of audit findings

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

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

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

4.2 Overall audit findings

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

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

Table 3: Total audit findings May - October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	5	4	6	3
Afl	10	23	26	7
O	6	22	26	2
Total	21	49	58	12

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

A total of forty-nine (49) audit findings were raised comprising four (4) Non-compliances, twenty-three (23) Areas for Improvement, and twenty-two (22) Observations.

Most of the audit findings were raised in the June 2024 quarterly audit, which assessed compliance against the requirements of most of Spark's environmental documentation (see Figure 4).

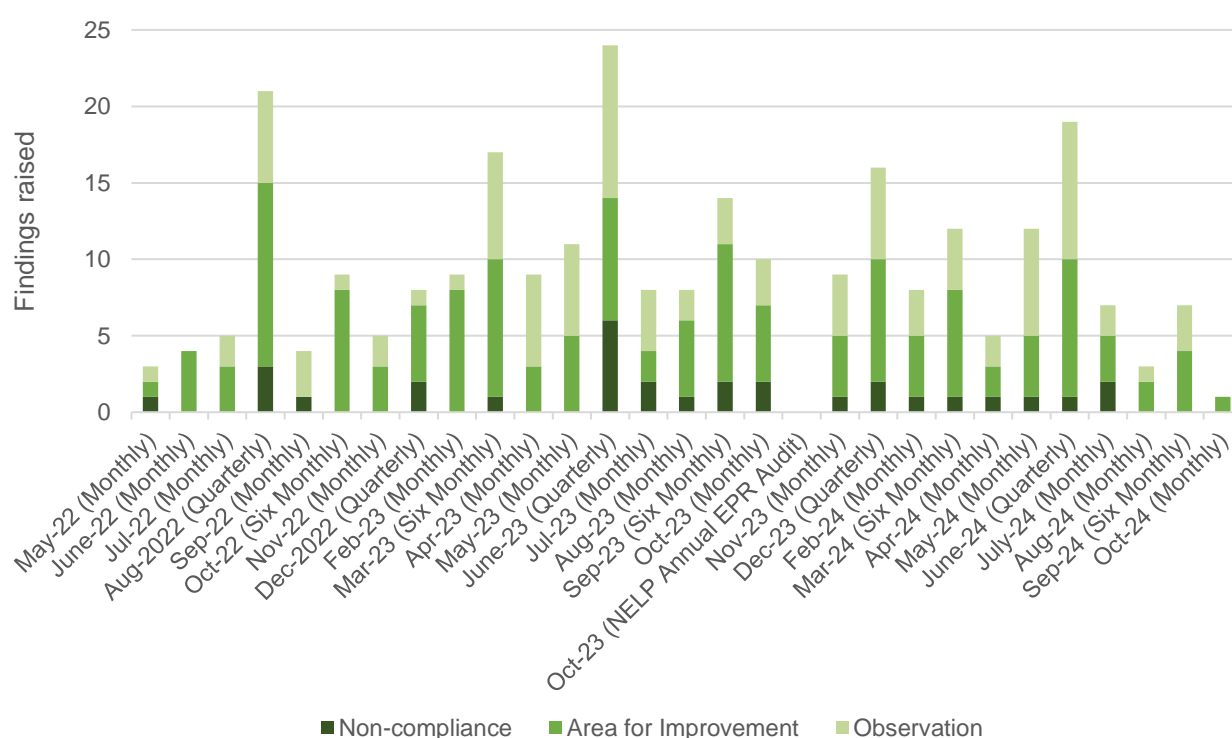


Figure 4: Audit findings by type and audit date (Project commencement to October 2024)

Spark D&C established corrective actions to address audit findings. Fifty-eight (58) findings were closed during the reporting period. Twelve (12) findings remained open at the end of the reporting period. (See Figure 5).

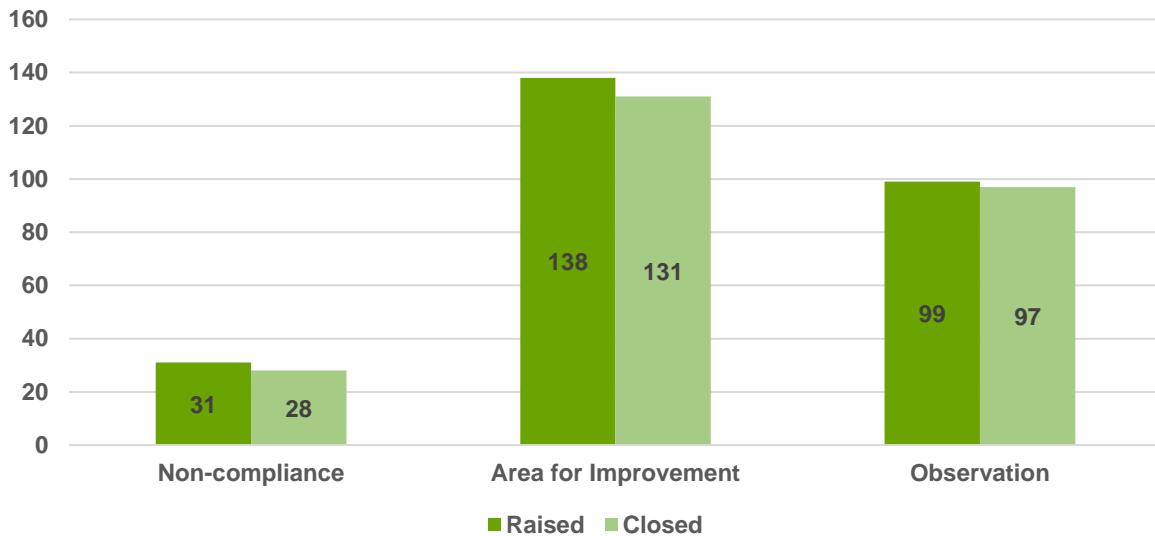


Figure 5: Cumulative audit findings raised and closed - Project commencement to October 2024

4.3 Compliance with the Incorporated Document

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

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

4.4 Compliance with Environmental Performance Requirements

All fifty-eight (58) planned and applicable EPRs as agreed with NELP and Project Co were audited for the period, with GW4 audited twice. This represents more than half of the applicable EPRs. At least one EPR from the 17 EPR categories, except Arboriculture, was included in the six-month period. While the Arboriculture EPRS were not formally audited in the reporting period, the related CEMP Management Plans were audited.

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

Five (5) findings were raised against the requirements of the EPRs, one (1) Area for Improvement and four (4) Observations (see Table 4).

In general, the findings are related to minor, but package-wide inadequacies in site environmental management and do not represent a material risk to the environment.

Table 4: Summary of EPR audit findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	0	0	0	0
Afl	2	1	3	0
O	0	4	4	0
Total	2	5	7	0

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

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

Figure 6 shows the distribution of EPRs in each of the categories noting which were audited, and the status of compliance for the reporting period. In addition to the five findings, Figure 6 also shows the compliance rating for EPR NV15 was set as U (or Undetermined) as Spark was continuing with the design process required to meet the EPR's requirements. Further, only EPRs relevant to the design and construction underway during the reporting period were included in the audit schedule for the period. Further, not all EPRs have equally detailed requirements, and there are different numbers of EPRs in each EPR category. The number of EPRs audited does not directly reflect the relative weight of environmental management requirements

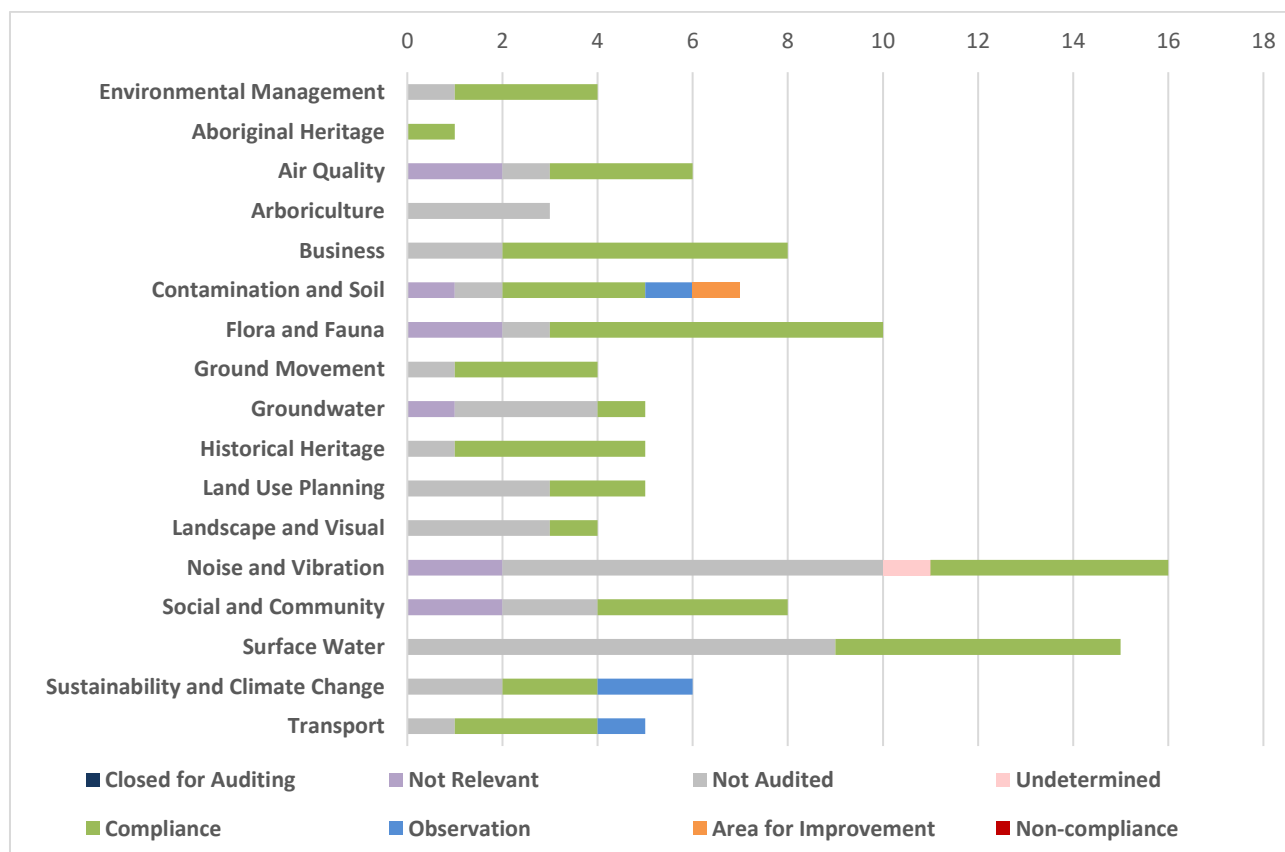


Figure 6: EPR audit findings by EPR category May to October 2024



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

4.5 Implementation of the Environmental Strategy

The implementation of the Environmental Strategy was audited in September 2024. One new finding was raised relating to the definition of roles and responsibilities (see Table 5).

Table 5: Environment Strategy audit findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	0	0	0	0
Afl	1	1	1	1
O	0	0	0	0
Total	1	1	1	1

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

4.6 Implementation of the Construction Environmental Management Plan

An audit of the selected key elements of the CEMP was conducted in June 2024, and an audit of all applicable elements was conducted in September 2024. Six (6) new audit findings were raised comprising no (0) Non-compliances, five (5) Areas for Improvement, and one (1) Observation. The findings were largely process related and did not present a direct risk to the environment.

A summary of the audit findings is given below.

Table 6: CEMP audit findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	0	0	0	0
Afl	3	5	4	4
O	2	1	3	0
Total	5	6	7	4

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

Seven (7) previous audit findings were closed; no (0) Non-compliances, four (4) Areas for Improvement, and no (0) Observations. Four (4) findings remained open.



4.7 Implementation of the Worksite Environmental Management Plans

The WEMPs applicable to the works underway were audited each month during the reporting period. Twenty-seven (27) findings were raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, ten (10) Areas for Improvement, and fifteen (15) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, and to process implementation issues.

Spark made good progress in addressing the findings, with twenty-eight (28) previous findings closed and seven (7) remaining open (see Table 7).

Table 7: WEMP audit findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	2	2	1	3
Afl	3	10	11	2
O	3	15	16	2
Total	8	27	28	7

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

4.8 Implementation of Management Plans

Spark has developed Management Plans to address the environmental management requirements for specific environmental aspects, and to meet the requirements of the EPRs. The applicable elements of the Management Plans were audited in June 2024 and September 2024. Ten (10) new findings were raised during the reporting period; two (2) Non-compliances, six (6) Areas for Improvement, and two (2) Observations (see Table 8).

The Non-compliances were raised against the requirements of the CNVMP for inadequate noise mitigation measures for out of hours works, and against the SWMP for an off-site discharge of water which did not meet discharge water quality requirements. The other findings related to Package Wide inadequate environmental controls, and to insufficient implementation of documented environmental management arrangements.

Table 8: Management Plans findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	3	2	5	0
Afl	1	6	7	0
O	1	2	3	0
Total	5	10	15	0

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



4.9 Implementation of Construction Compound Plans

Three of the Construction Compound Plans approved by the Minister (CCP-0004, CCP 0009 and CCP-0013) were audited in the reporting period, in June 2024. No findings were raised, and there were no open findings related to CCPs.

Table 9: CCPs findings May to October 2024

Finding Type	Open at start of May 2024 - Oct 2024 period	Raised during May 2024 - Oct 2024 period	Closed during May 2024 - Oct 2024 period	Open at end of May 2024 - Oct 2024 period
N	0	0	0	0
Afl	0	0	0	0
O	0	0	0	0
Total	0	0	0	0

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

5 Audit conclusions

The audit findings trends over the reporting periods show that Spark's documented environmental management arrangements have improved to reflect actual environmental management processes, and Spark's implementation of these processes has improved. The number of audit findings against the process documents (Environment Strategy, CEMP, and Sub-Plans) has decreased (see Figure 7). Findings against the WEMPs, which largely manage on ground environmental controls, also decreased compared to the previous reporting period. The number of WEMP-related findings may correspond with the increased scope and complexity of construction activities. However, the findings also note the need for Spark to further establish commensurate environmental controls.

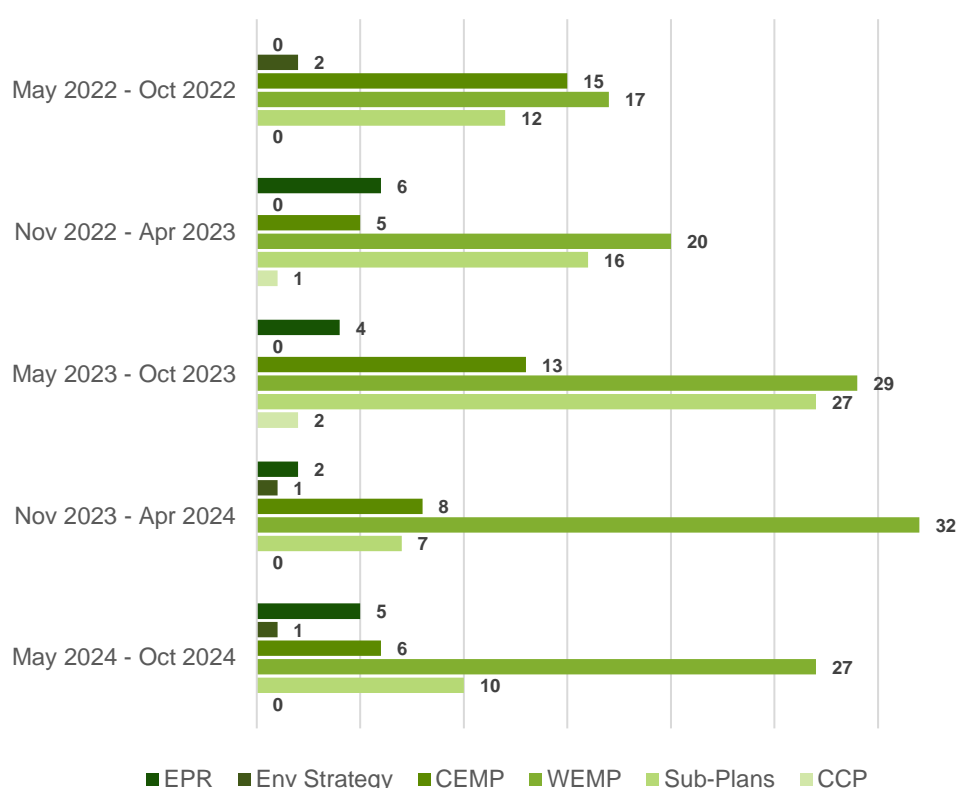


Figure 7: Audit findings by reporting periods

5.1 Compliance with Plans required in the Incorporated Document

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

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



5.2 Compliance with Environmental Performance Requirements

Fifty-eight (58) of the EPRs for which Spark is responsible were audited in the reporting period. Five (5) findings were raised against the requirements of the EPRs, one (1) Area for Improvement and four (4) Observations.

In general, the findings are related to minor, but package-wide inadequacies in site environmental management and do not represent a material risk to the environment.

Overall, the requirements of the EPRs were met.

The number of findings raised against EPRs has increased over previous reporting periods (see Figure 7).

5.3 Implementation of the Environmental Strategy

The Environmental Strategy provides an adequate framework for environmental management.

The number of findings raised against the Environment Strategy has remained low in each reporting period (see Figure 7).

5.4 Implementation of the Construction Environmental Management Plan

The CEMP is the main overarching document which outlines the processes and systems to manage Spark D&C's environmental aspects. The CEMP has been documented to meet the requirements of ISO14001.

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

CEMP-related audit findings show that Spark's environmental management system is progressing and that the documented environmental management arrangements are increasingly reflecting actual environmental management practices.

Findings against the CEMP have been raised in each reporting period (see Figure 7). Spark D&C continued to address these findings. There is a slight reduction in CEMP related findings over time.

5.5 Compliance with the requirements of the Worksite Environmental Management Plans

The WEMPs have been established to meet the requirements on the EMF and the PSDR. However, they remain complex documents for managing site environmental management. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting increased construction activities, and to process implementation issues.

The issues highlighted by these findings present a potential risk to the local environment.

The number of findings against the WEMPs has decreased from previous reporting period (see Figure 7). However, the findings also note the need for Spark to further develop commensurate environmental controls. Spark has not demonstrated that these on-ground controls are always effective.



5.6 Compliance with the requirements of the Management Plans

The EMF requires the development and implementation of specific Management Plans. Spark has developed all the plans required for the scope of work undertaken during the reporting period.

The findings against the Management Plans reflect package wide environmental issues, with the potential for environmental harm.

The number of audit findings against the requirements of the Management Plans increased from the previous reporting periods (see Figure 7). Spark has revised environmental documentation to more accurately reflect actual environmental management practices and has been more thorough in implementing the defined environmental management arrangements.

5.7 Compliance with the requirements of the Construction Compound Plans

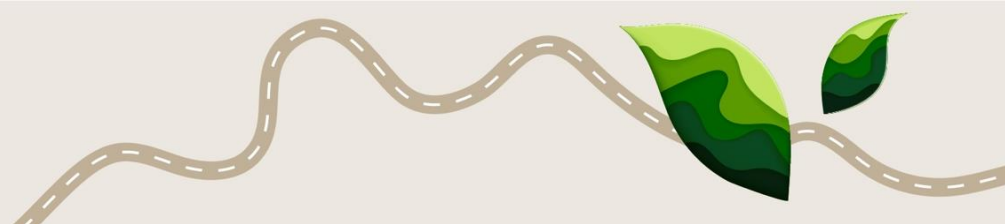
The development of Construction Compound Plans (CCPs) to the satisfaction of the Minister for Planning is required by the Incorporated Document. No new audit findings were raised against the requirements of the approved CCPs.

CCPs are audited when new compounds are established, modified, or demobilised. Audit findings are therefore expected to vary during the project lifecycle.



Appendix 1 – EPRs audited in the reporting period

Audit date	EPRs audited	
June 2024	Environmental Management (EMF)	EMF4
	Aboriginal Heritage	AH1
	Air Quality (AQ)	AQ1
	Business (B)	B4, B7, B8
	Contamination and soil (CL)	CL4, CL5
	Flora and Fauna (FF)	FF2, FF3, FF4, FF5, FF6, FF9
	Groundwater (GW)	GW4
	Historical Heritage (HH)	HH4, HH5
	Noise and Vibration (NV)	NV3, NV4, NV15
	Social and Community (SC)	SC3, SC4
	Surface Water (SW)	SW1, SW2, SW5
	Sustainability and Climate Change (SCC)	SCC1, SCC2
	Transport (T)	T1, T2, T3
September 2024	Environmental Management (EMF)	EMF1, EMF2
	Air Quality (AQ)	AQ2, AQ3
	Business (B)	B1, B5, B6
	Contamination and soil (CL)	CL2, CL3
	Flora and Fauna (FF)	FF1
	Ground movement (GM)	GM1, GM2, GM3
	Groundwater (GW)	GW4
	Historical Heritage (HH)	HH1, HH3
	Land use planning (LP)	LP1, LP4
	Landscape and visual (LV)	LV3
	Noise and Vibration (NV)	NV5, NV8, NV9
	Social and Community (SC)	SC5, SC6
	Surface Water (SW)	SW3, SW7, SW13
	Sustainability and Climate Change (SCC)	SCC4
	Transport (T)	T5



Appendix 2 – Audit findings and summary of actions taken

Audit Findings Raised During the Reporting Period

Table 10: Summary of audit findings against the Environmental Strategy

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Sep-24	IEA-0924-01	Afl	Environmental Strategy 3.3 Roles and Responsibilities: The roles and responsibilities defined in the Environmental Strategy do not align with actual discharged roles and responsibilities.	<p>The Environment Strategy is being revised to reflect the roles and responsibilities. This was not complete during the reporting period.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	

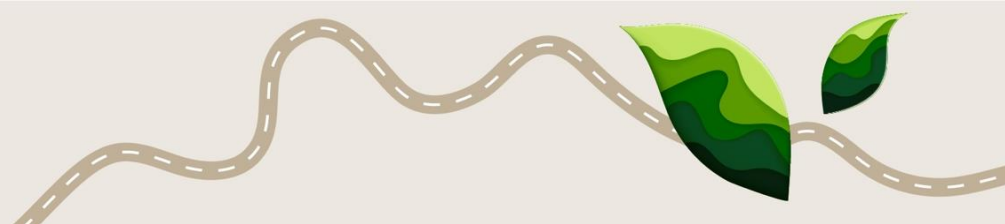


Table 11: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-24	IEA-0524-01	O	EPR SCC2 Minimise greenhouse gas emissions: Lights at Watsonia Box and at several work sites in the south were on during the day	At subsequent audits lights were observed to be switched off in daylight hours. This finding related to on-site environmental controls and represented a low risk to the environment and achievement of sustainability targets.	Closed	Jul-24
Jun-24	IEA-0624-01	O	EPR CL5: Unbunded chemical containers observed at Manningham Cut and Cover, Trinity North Cut and Cover, and Bulleen (Trinity South).	At subsequent audits chemicals were observed to be appropriately stored in the south and north. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
Jun-24	IEA-0624-02	O	EPR T2: Project badged construction vehicle was observed parked on Watson Street, Watsonia next to a "No Project Parking" sign.	At subsequent audits vehicles on Watson Street were observed to be parked in accordance with project requirements. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
Sep-24	IEA-0924-04	O	EPR SCC2 Minimise greenhouse gas emissions: Lights at work sites in the south were on during the day	Lights were observed to be still on in the south but this was required for operational purposes. This finding related to on-site environmental controls and represented a low risk to the environment and achievement of sustainability targets.	Closed	Oct-24
Sep-24	IEA-0924-05	Afl	EPR CL5: Hazardous chemicals were observed either unbunded or stored outside the designated storage areas at sites across the north and south.	Chemicals storage was observed to be appropriate during subsequent site visits. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Oct-24

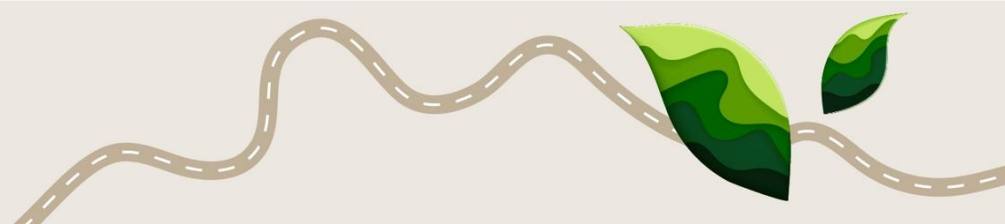
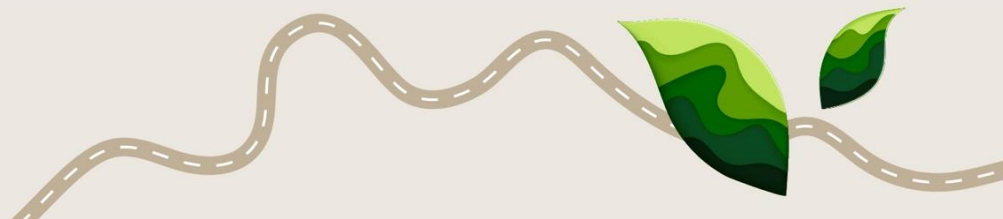


Table 12: Summary of audit findings against the CEMP

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-24	IEA-0624-03	O	CEMP 4.1 Environmental requirements compliance. The record of compliance with secondary approvals in the Obligations Register only accounts for the approval expiry and does not include compliance with the approval conditions.	The Obligations Register Secondary Approvals had been revised to note compliance status for each condition of approval. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-24
Jun-24	IEA-0624-04	Afl	CEMP 10.3 Environmental incidents: The classifications of incidents in Synergy, and in the Incident Management Procedure and Incident Management matrix do not align. The classification of incidents has been ambiguous.	The revision of the incident management documentation and the training was in progress but had not been completed during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jul-24	IEA-0724-01	Afl	CEMP 6.5 Environment in Design: Design documentation details including changes for the Winsor Reserve water treatment plant and stormwater drains could not be provided.	The design documentation was collated for provision to Yarra Valley water. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jul-24	IEA-0724-02	Afl	CEMP 10.3 Incidents: Environment related observations identified by the IREA Construction Surveillance teams and reported to the Spark Construction Team members had not been reported and actioned in Synergy.	Evidence was provided of internal communications within Spark's Environment and Construction teams outlining requirements when IREA Construction Surveillance Reports are received. All environmental observations raised by IREA surveillance teams in the audit period have been actioned by Spark's environmental team. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-24
Aug-24	IEA-0824-01	Afl	CEMP 5.5.3 Site Environmental Plans: Not all recently updated SEPs included the location of unattended monitors.	SEPs have been revised to include the location of unattended monitors. This finding related to documented environmental management	Closed	Sep-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				arrangements and did not represent an immediate material risk to the environment.		
Sep-24	IEA-0924-02	Afl	CEMP Section 5.5.3 Site Environmental Plans: SEPs did not contain all relevant environmental controls or information as required by the CEMP. This included (but not limited to) drainage inlet pits and sediment and erosion controls.	The SEPs were revised and include the defined required information. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-24

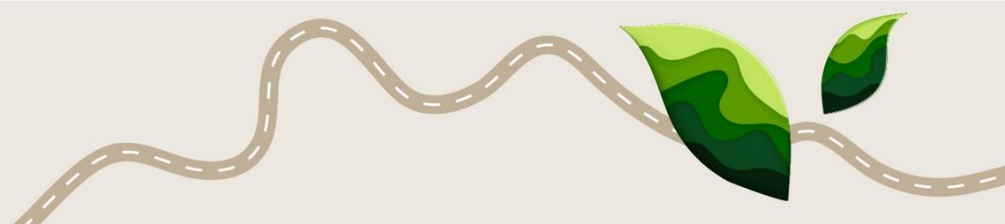
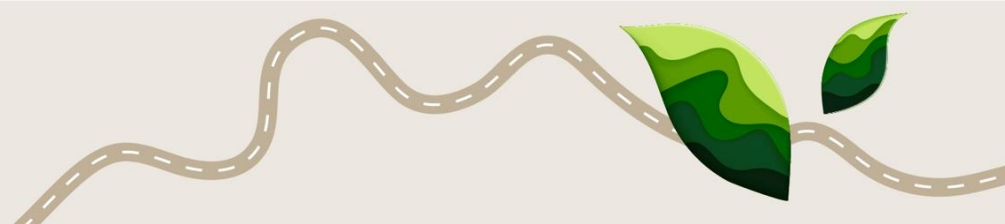
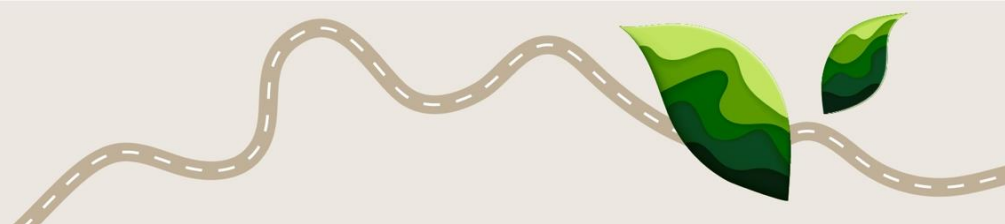


Table 13: Summary of audit findings against the WEMPs

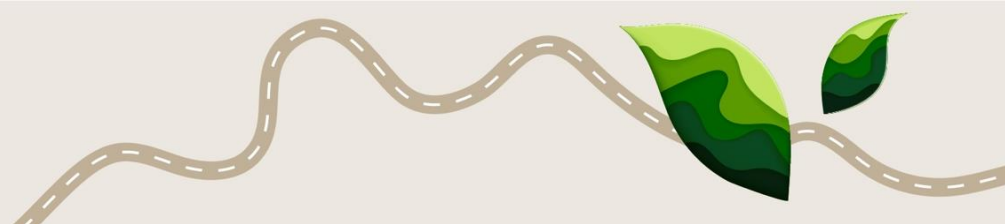
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
May-24	IEA-0524-04	O	WEMP-18 Ancillary Works 9 Environmental Aspects – Contamination and Spoil: The labels on the dangerous goods container used to store hydraulic oil at Trawalla had not been updated.	The site installed labels for the hydraulic oil storage containers. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
May-24	IEA-0524-05	O	WEMP-31 Watsonia 4 Working Hours: The status of the unavoidable OOH permit for TBM assembly works in Civillo was shown as expired even though the OOH works have been approved until 30 June 2024.	A new permit was raised and was valid to 17 July 2024. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-24
May-24	IEA-0524-06	Afl	WEMP 31 Watsonia 7.1 Environmental Monitoring Management Plan – Surface Water: During a high rainfall event, the Yallambie sediment basin overflowed and discharged wastewater to the local drains.	The Yallambie sediment basin was decommissioned and alternative surface water controls were implemented. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
May-24	IEA-0524-07	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Aboriginal Cultural and Historical Heritage: Mats had not been installed to minimise ground disturbance from vehicles using the shared user path at the Rivergum work area.	Mats to protect ground disturbance were installed at the Rivergum area. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-24
May-24	IEA-0524-08	Afl	WEMP 32 Lower Plenty 7.1 Environmental Monitoring Management Plan – Surface Water: An elevated pH measurement taken from the Banyule Creek Downstream monitoring location had not been acknowledged in the monitoring records.	Notes had been added to the monitoring platform SiteHive in relation to the elevated pH reading. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-24



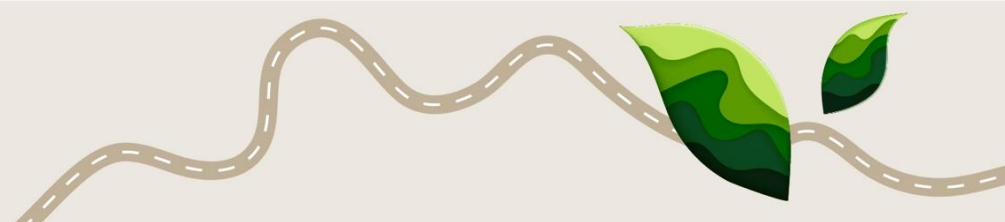
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
May-24	IEA-0524-09	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Air Quality: Excessive visible smoke was observed from the diesel generator at the Lower Plenty mini-compound.	The position and operation of the diesel generator and the exhaust had been altered to avoid smoke emissions. The generator had also been serviced. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
May-24	IEA-0524-10	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Contamination and Spoil: The cover for the asbestos stockpile at Lower Plenty had split.	The asbestos stockpile cover was reinstated. The stockpile had been tested and classified as clean fill and removed from site. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
May-24	IEA-0524-11	O	WEMP 32 Lower Plenty Environmental Aspects – Contamination and Spoil: A fuel jerry can was stored outside the bunded area.	Adequate dangerous good storage was observed at Lower Plenty. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-24
May-24	IEA-0524-12	Afl	WEMP 34 Bulleen 9 Environmental Aspects – Air Quality: Raised dust was observed on Bulleen Road as a result of mud tracking	Mud tracking and raised dust continued. However, a new finding was raised against the DAQMMP as the issue continued in Bulleen and at Manningham. See audit finding IEA-0624-07. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
Jun-24	IEA-0624-09	O	WEMP-31 2.3 Key Reference Documents Secondary Approvals: The methodology for calculating the Watsonia TWA daily TDS load was not clear.	The methodology to determine the daily TDS load had been modified. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
Jun-24	IEA-0624-10	O	WEMP-31 9 Environmental Aspects: Noise and Vibration: Two forklifts in use at Watsonia were fitted with tonal reverse beepers.	No tonal reverse beepers were observed during the subsequent site visit. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24



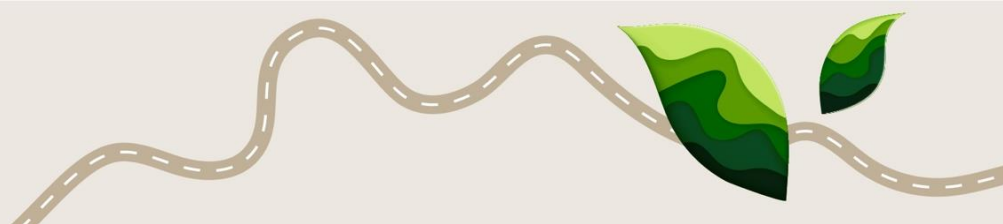
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-24	IEA-0624-11	Afl	WEMP-32 8 Risk Assessment: Controls nominated in Construction Package CP299 (Rev 0 IFU) to be established prior to commencement of works associated with the Northern Ventilation Building were either not in place or inconsistent with controls in WEMP-32.	The revised Construction Package was certified by the IREA (sighted) and the on-site controls updated based on the construction risks. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Oct-24
Jun-24	IEA-0624-12	O	WEMP-32 9 Environmental Aspects: Air Quality: Dust was observed leaving site from concrete saw cutting at Rivergum Walk, and use of the drum grinder along the LP eastern terrace.	No dust generating works were observed during the subsequent site visit to Lower Plenty and Rivergum Walk. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
Jun-24	IEA-0624-13	O	WEMP 32 9 Environmental Aspects: Contamination and spoil: The Lower Plenty wheel wash was not operational.	The wheel wash was upgraded and additional mud controls implemented. However, mud tracking on to Lower Plenty Road continued. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Jun-24	IEA-0624-14	Afl	WEMP-32 9 Environmental Aspects: Surface Water Management: The Barracks Headwall Upstream drain adjacent to the bentonite lines was unprotected.	The Barracks Headwall Upstream Drain was observed to be protected with an earthen bund. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24
Jun-24	IEA-0624-15	Afl	WEMP-32 9 Environmental Aspects: Surface Water Management: Banyule Creek monitoring records have not been evaluated to determine impacts from potential construction related sources.	There is ongoing Banyule Creek upstream and downstream water quality monitoring during the reporting period. Results continued to indicate variability across the site. Further monitoring to take place to correlate the extent of impacts, if any. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-24	IEA-0624-16	N	WEMP-34 8 Risk Assessment: Trinity Dam was observed to have been repurposed into a construction sedimentation/treatment/storage dam without a formal risk assessment.	Controls had been implemented to limit construction water drainage into Trinity Dam. Water from Trinity Dam continued to be treated through the Trinity South WTP and discharged to trade waste. Work progressed to estimate the water flows, flood storage capacity and remaining information required to fully assess the risk and establish appropriate operational controls. Ongoing discussion with EPA for discharge options are continuing. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Jun-24	IEA-0624-17	O	WEMP 33 9 Environmental Aspects: Contamination and spoil: A diesel spill from generator refuelling at Manningham C&C was observed. The spill was contained with a spill kit; however, it had not been reported to the environmental team.	The spill had been reported, the area had been cleaned and there was no residual spill material or odour observed during the subsequent site visit. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-24
Jun-24	IEA-0624-18	O	WEMP 34 9 Environmental Aspects: Air Quality: Odour from exhaust emissions observed beyond the boundary of the site at Trinity North. Noting that investigation is underway by WSP, however strong odour was detected on site.	Golder WSP had been engaged to develop a revised site air quality memo, including recommendations. Recommendations include the conduct of odour surveys and the installation of additional dust monitors. The recommendations had been largely implemented during the reporting period. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Sep-24
Jun-24	IEA-0624-19	Afl	WEMP 34 9 Environmental Aspects: Surface Water Management: Unprotected drains observed in the Bulleen Swim Centre work area.	Drains were observed to be adequately protected in subsequent site inspections. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jul-24	IEA-0724-05	N	WEMP 31 2.3 Key Reference Documents Table 4 Secondary Approvals: Compliance with some of the clauses of the trade waste agreements such as in schedule 2 of the agreements for sampling and monitoring, could not be fully demonstrated.	A review of trade waste sampling and monitoring requirements was undertaken by Spark. Aligning the recording and checking of sampling and monitoring results required for each TWA was underway during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jul-24	IEA-0724-06	Afl	WEMP 31 4 Working Hours: The existing Unavoidable OOHW permit POH-NSW-333 for TBM assembly at Watsonia was renewed without formal IREA verification.	Permit POH-NSW-333 was renewed and verified by IREA. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Aug-24
Jul-24	IEA-0724-07	O	WEMP-34 10 Consultation: The EPA site visit and any follow-up actions required, have not been formally recorded.	A Synergy event was raised for the EPA visit and categorised as a Regulatory Visit. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Aug-24
Aug-24	IEA-0824-03	O	WEMP-34 9 Environmental Aspects – Contamination and Spoil: The WASS stockpile at Bulleen Trinity South was not adequately labelled.	The WASS stockpile at Bulleen Trinity South as observed to be appropriately labelled in the subsequent site visit. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Sep-24
Sep-24	IEA-0924-06	Afl	WEMP-32 9 Environmental Aspects: Surface Water: Not all drains at Lower Plenty south of Blamey Road were adequately protected.	Significant progress was made to protect the drains. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Oct-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Sep-24	IEA-0924-07	O	WEMP-33 9 Environmental Aspects: Arboriculture: While controls and processes to protect the River Red Gum Tree 8017 were largely implemented, the Tree Protection Plan Bulleen Industrial Zone had not been updated to describe the overall management approach associated with the tree 8017 related protection actions undertaken.	An updated Tree Protection Plan – Tree 8017 dated 25 Oct 2024 and the Arboricultural Impact Assessment dated 23 October 2024, were being finalised during the reporting period. This finding related to on-site environmental controls and represented a low risk to the environment.	Open	
Oct-24	IEA-1024-01	Afl	WEMP-34 7.3 Groundwater and GDE Monitoring: Aquifer recharge bores to maintain or mitigate groundwater level drawdown at Trinity North were not commissioned or operational.	Work is underway to determine the status of individual groundwater recharge wells. Work continued but had not yet been completed during the reporting period to prepare the groundwater well recharge network. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	

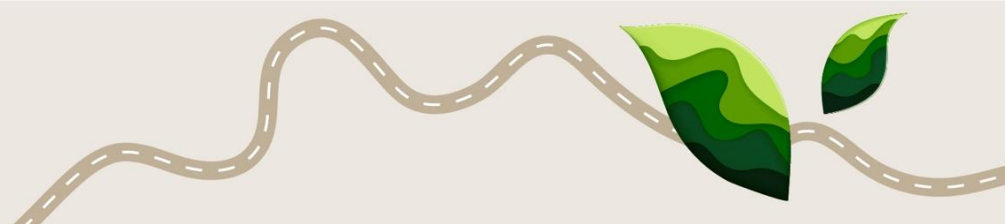
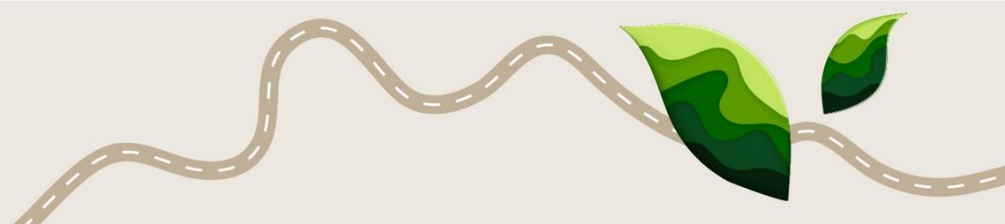
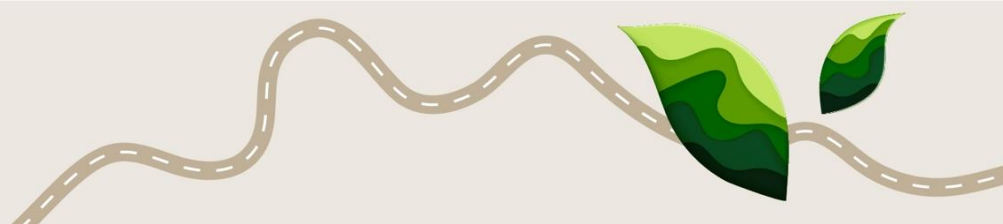


Table 14: Summary of audit findings against the Management Plans

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
May-24	IEA-0524-02	N	CNVMP 8.3 - Controls for Avoidable Works During the Evening/Night Time: Implementation of actions specified in the CNVMP, associated CNVIAs and GateWave assessments to minimise noise-related impacts on sensitive receptors from managed impact OOH works, could not be demonstrated.	A mechanism to track identified mitigation measures had been implemented. Recommendations in the updated CNVIA and other relevant actions continued to be captured and tracked. Attended monitoring was also ongoing. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-24
May-24	IEA-0524-03	Afl	EMMP 5.3.1 Attended Monitoring: Discrepancies were observed in the attended monitoring records for the southern sites. This included different monitoring targets for compliance noted on the Renzo Tonin GateWave and CNVIA reports, Spark field monitoring sheets, and excel monitoring data spreadsheet.	Attended monitoring records have been reviewed and updated. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
Jun-24	IEA-0624-05	Afl	CNVMP 8.2 Controls for Unavoidable Works During Night-time: Unavoidable OOH work permits have been issued without all notification and mitigation measures implemented.	Actions to address this finding were implemented in the reporting period. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Sep-24
Jun-24	IEA-0624-06	Afl	CNVMP 8.2 Controls for Unavoidable Works During Night-time: Repeated instances of OOH work permit related events at Lower Plenty were reported during the audit period for works without an OOH permit, works conducted outside of permitted hours or for use of	There were no OOH work permit related events identified on subsequent audits. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
			unpermitted plant indicating ineffective corrective action close out.			
Jun-24	IEA-0624-07	Afl	DAQMMP 5.3.1 Construction Impacts: Continued mud tracking onto external roads has resulted in exceedances of the 24 hour PM10 criteria in the South.	Asphalt had been applied to additional exposed areas in the south and a new truck wheel wash bath was installed at Manningham. Roads were observed to be largely free of excess mud tracking in subsequent audits. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24
Jun-24	IEA-0624-08	Afl	DAQMMP 9.1.2 Monitoring program: Intermittent dust monitor power supply issues has resulted in air quality monitoring data gaps.	Air Met monitor at St Martin's was connected to mains power. Additional solar panels were added to the AirMet at Manningham Wedge and Bulleen (Trinity South). This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24
Jul-24	IEA-0724-03	O	SWMP 9.1 Surface Water Monitoring: Records of the post rainfall inspections conducted at Winsor, Watsonia and Lower Plenty had not been appropriately documented.	Post rainfall inspections were observed to have been appropriately documented in the subsequent audit. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24
Jul-24	IEA-0724-04	N	SWMP 9.1.4 Surface Water Dewatering Criteria: Controlled flood water discharged from Bulleen including from Trinity Dam under the approved dewatering permit did not meet all ERS water quality limits.	The discharge was ceased and there was no additional discharge from Trinity Dam to the Yarra River during the flood event. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-24
Aug-24	IEA-0824-02	Afl	SWMP 9.1 Surface Water Monitoring: Records of the surface water quality results for background and site monitoring locations at Bulleen and Manningham did not include explanatory notes when measurements were higher than the internally set alert levels.	Explanatory notes for water quality measurements measured to be higher than the internally set alert levels had been included in the water monitoring spreadsheet. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Sep-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Sep-24	IEA-0924-03	O	SMP 4.1.1.1 and Appendix C: There is currently no Spark D&C Sustainability Director as required by PSDR Part F1 s6.2(c).	A new D&C Sustainability Director had been appointed. This finding related to documented sustainability management arrangements and represented no material risk to sustainability management.	Closed	Oct-24

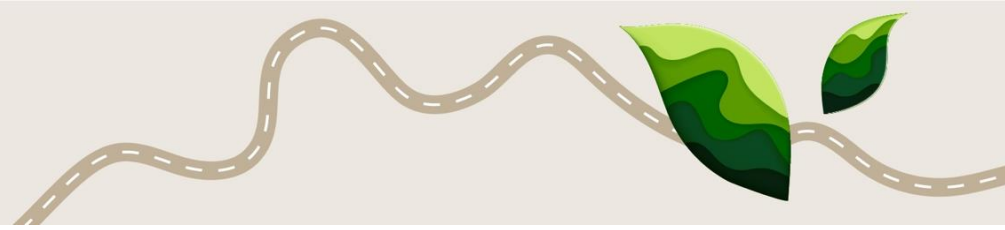


Table 15: Summary of audit findings against the CCPs

No new findings were raised against the requirements of the CCPs during the reporting period

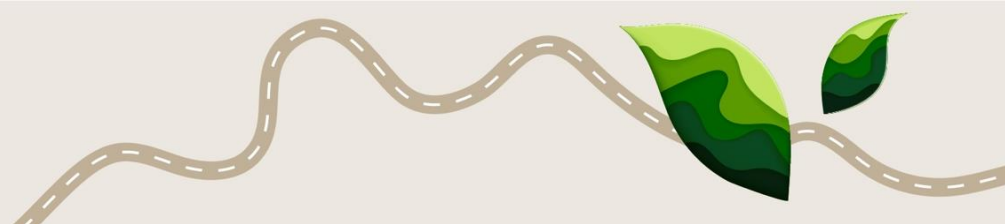
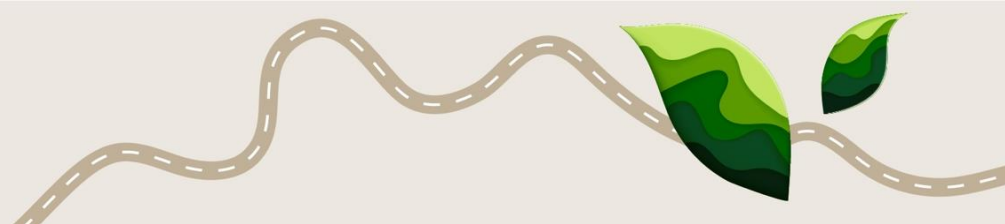
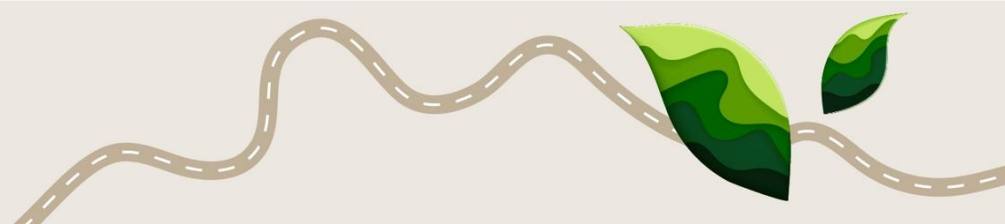


Table 16: Previous open audit findings

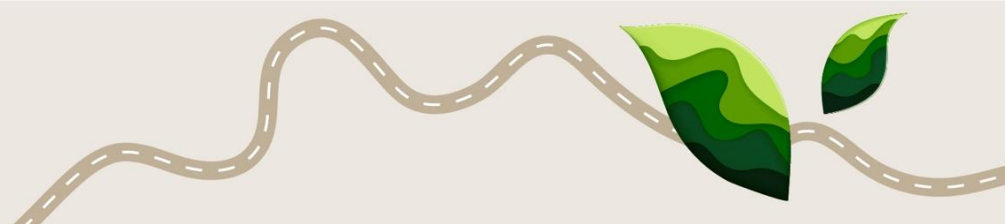
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jun-23	IEA-0623-06	O	CEMP 9.2.2 Digital tools. Digital augmented reality tools have not been implemented.	The CEMP has been revised and issued for use. Reference to augmented reality tools to be included in the Spark Digital Management Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-24
Jun-23	IEA-0623-20	N	Spoil MP 10.5 Reporting: Monthly spoil summary report does not contain all relevant information as required by the PSDR. For example, certified weighbridge dockets are missing.	Spark has revised the spoil data provided in the monthly report and it included all the required information during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-24
Oct-23	IEA-1023-02	N	WEMP-20 9.16 Traffic and Transport: Project cars were observed parked in no project parking areas on Somers Avenue.	The TMP and CCEMP require revision to reflect actual parking restrictions. Review of the TMP and CCEMP was ongoing during the reporting period. This finding related to on site environmental controls and represented a low risk to the environment.	Open	
Nov-23	IEA-1123-04	O	WEMP-31 Watsonia 9 Environmental Aspects – Contamination and Spoil: Evidence to support the removal of the Watsonia Box weighbridge and replacement with the weigh in motion scales was not provided at audit.	Spark has requested waivers from the State for situations where weighbridges are offline and to meet the PSDR requirements. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-24



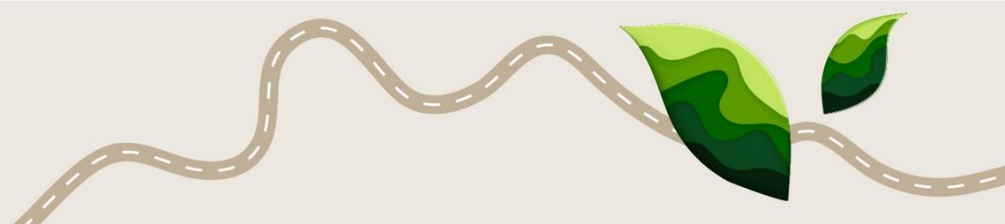
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Dec-23	IEA-1223-01	Afl	EPR GW4: Processes defined in the Groundwater Management Plan have not been fully or effectively implemented including for the submission of stage 2 baselines and trigger levels prior to bulk excavation. Spark has raised internal audit non-conformances with associated action plans.	The GWMP has been revised to reflect groundwater management processes, verified by IREA, and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-24
Dec-23	IEA-1223-02	Afl	Environment Strategy 3.3.1 Project Co Leadership Team: The Environment and Sustainability Director role is vacant.	The previous incumbent has been appointed to the position. Advised by NELP that the appointment has been approved. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-24
Feb-24	IEA-0224-01	Afl	GWMP Section 14 Reporting: Reporting of groundwater information is not fully in accordance with the requirements documented in the GWMP including but not limited to, provision of monthly factual data, RFIs and reports to NELP and IREA. It is noted that some information is provided to NELP and IREA at the weekly MAT meetings.	The GWMP has been revised to reflect groundwater management processes, verified by IREA, and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-24
Feb-24	IEA-0224-05	N	WEMP-33 Manningham 2.3 Key Approvals: Construction compound huts were installed at Manningham north without an approved CCP.	The CCP has been approved by the Minster for Planning for approval. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Mar-24	IEA-0324-01	Afl	EPR FF6: A monitoring program and mitigation plan for identified GDEs has not yet been fully developed and implemented in accordance with the requirements of FF6.	The GWMP has been revised to reflect groundwater management processes, verified by IREA, and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Sep-24
Mar-24	IEA-0324-02	Afl	CEMP 4.5.2 Package procedures. Procedure cited in the CEMP and sub-plans (such as the MSP28 Monitoring Measurement of Processes and Products in CEMP s9.1 and the MSP22F Noise, vibration and light risk management in CNVMP, MSP22O Authority and Permit to Work) are either not used or not relevant.	Spark has updated the CEMP and sub-plans with the relevant Spark procedures. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Feb-25
Mar-24	IEA-0324-03	O	CEMP 5.3 Sensitive receptors. Sensitive receptors not included in the Environmental Aspects and Impacts register.	The CEMP has been revised and issued for use. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-24
Mar-24	IEA-0324-04	Afl	CEMP 6.5 Environment in Design. Three Category 1 DPs [1060, 1306 and 1162] did not have appropriate internal review by the environment team. The Environment team were not involved in the categorisation of temporary works DPs.	The Temporary Works procedure has been revised to require that EPRs are to be included in relevant DPs, and Environment Team to be involved in reviews. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-24
Mar-24	IEA-0324-05	Afl	CEMP 9.5.1 Corrective and Preventive Actions: Verification of the effectiveness of actions is not currently formalised.	An overarching process to verify effectiveness of corrective actions was established. Implementation of the processes including training had not been completed. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Mar-24	IEA-0324-06	N	CNVMP 8.3 Controls for Avoidable Works During Evening/Night-time – Works at Lower Plenty breached the conditions of a Managed Impacts OOH works permit. Noise exceedances were recorded and verified complaints were received. Works were not ceased as required. The previous night works had also breached the conditions of the Managed Impacts OOH works permit.	The actions identified to address this finding included a review and alterations to the permit. The construction manager, senior project engineers were briefed by the Environment Director and the Communications Director at Lower Plenty. Training was conducted for both day and night shift personnel. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
Mar-24	IEA-0324-07	O	SWMP 9.1.4 Surface water dewatering criteria – The dewatering and discharge permit does not include clear checks for litter and other pollutants or visual sheen as per the Victorian Stormwater Committee's Best Practice Environmental Management Guidelines for Urban Stormwater.	The Civillo permit has been updated. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
Mar-24	IEA-0324-12	Afl	WEMP-34 Bulleen 9 Environmental Aspects - Surface Water Management: Mud tracking was observed on Bulleen Road associated with construction vehicles departing the Trinity North, Trinity South and Bulleen SRD sites.	A new truck wash bay has been installed at Manningham. Additional FODS mats were in use at Bulleen. Roads were observed to be in good condition with significantly reduced mud tracking on Bulleen Rd, Manningham Road, and Bridge Street. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-24
Apr-24	IEA-0424-01	N	SWMP 7.1 Water Quality Control Measures: Controlled unpermitted discharge of water from Winsor Reserve spoil shed was observed.	The need for adherence to the Dewatering Procedure was discussed with site personnel. Additional protection has been installed for stormwater pits at Winsor Reserve. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	May-24



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Apr-24	IEA-0424-02	Afl	WEMP-20 Winsor Reserve Spoil Shed 9 Environmental Aspects – Surface Water Management: Stormwater entering drains and discharge from drainage pits at the Winsor Reserve spoil shed were not fully controlled. This included the lack of protection of external pits near the weighbridge and truck wheel wash bay, and the observed seepage from the large collection pit in the southwest corner outside the WTP.	Drains at the Winsor Reserve spoil shed requiring protection had been identified and fitted with appropriate controls. Ongoing actions were underway to connect the site stormwater to the council drains. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	May-24
Apr-24	IEA-0424-03	O	WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water Management: Mud tracking from vehicles leaving Lower Plenty observed on northbound Greensborough Road lanes.	Street sweepers were observed to be operating both on and off site. It was noted that mud tracking was significantly reduced during the subsequent site inspection on Greensborough and Lower Plenty Roads. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-24
Apr-24	IEA-0424-04	Afl	WEMP-34 Bulleen 4 Working Hours: It was unclear from the GateWave and CNVIA reports how noise limits for avoidable OOHV permits, including associated triggers in B&K noise loggers have been set and were being managed.	The triggers were reviewed and updated on the noise loggers. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-24
Apr-24	IEA-0424-05	O	WEMP-34 Bulleen 9 Environmental Aspects – Surface Water Management: A dewatering permit was issued in the Civillo Permit System after the permitted activity was approved and completed.	Subsequent dewatering was undertaken after a permit had been issued. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	May-24



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