North East Link Program – Central Package

IEA Six-Monthly Summary Environmental Compliance Report – November 2024 to April 2025

A Report to the Minister for Planning

NEL-CNT-AAA-2990-EEE-REP-0006

Revision 1

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OFFICIAL

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Contents

Tables

Figures

Abbreviations

AAAJV	APP Arup Aurecon Joint Venture
AHMP	Archaeology & Heritage Management Plan
AMCC	Alternative Motorway Control Centre
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	Environment Reference Standard
ERSED	Erosion and Sediment (Control Plan)

FEMP	Flood Emergency Management Plan
FP	Freeway Package(s)
GDE	Groundwater dependent ecosystem
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
ICAN	Interim Contamination Assessment Notice
IEA	Independent Environmental Auditor
IFC	Issued for Construction
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
M80 RRA	M80 Ring Road Alliance
MAT	Monitoring Action Team
MCC	Motorway Control Centre
MHM	Manningham
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
PSDR	Project Scope and Delivery Requirements
PCo	(Spark) Project Company

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)
TCRP	Tree Canopy Replacement Plan
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
YVW	Yarra Valley Water

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 to conduct 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 November 2024 to April 2025.

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	Nov 24 (NELP EPRs)	Nov 24 (WEMP)	Dec 24 (Quarterly)	Feb 25 (WEMP)	Mar 25 (6 monthly)	Apr 25 (WEMP)
EPRs (as scheduled)	✓		✓		✓	
Environmental Strategy						
Construction Environmental Management Plan			✓ (selected elements)		✓ (all applicable elements)	
Management Plans required by the EPRs			✓ (selected plans)		✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)		✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)						

A total of fifty (50) audit findings were raised comprising six (6) Non-compliances, twenty-seven (27) Areas for Improvement, and seventeen (17) Observations. Forty-four (44) findings were closed during the reporting period. Eighteen (18) findings remained open at the end of the reporting period.

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	3	6	7	2
AfI	7	27	25	9
O	2	17	12	7
Total	**12**	**50**	**44**	**18**

N – Non-compliance; AfI – 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 (CEMP, and Sub-Plans) has remained largely steady. Findings against the WEMPs, which largely manage on ground environmental controls, have slightly reduced but continued to make up about half of the total findings raised.

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.

Ten (10) of the EPRs for which NELP is wholly or partly responsible were audited in the reporting period. No findings were raised.

Fifty-eight (58) of the EPRs for which Spark is responsible were audited in the reporting period. Four (4) findings were raised against the requirements of the EPRs; one (1) Non-compliance, one (1) Area for Improvement, and two (2) Observations. These findings related to chemical storage, unneeded lighting during the day, and project parking. Three (3) findings were closed, and one (1) finding remained open at the end of the reporting period.

Implementation of the Environmental Strategy

The Environmental Strategy was not audited in the six month reporting period. One previous finding remained open.

Implementation of the Construction Environmental Management Plan

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

Eight (8) findings were closed and one (1) remained open at the end of the period.

In addition, one finding was raised against the requirements of the PSDR relating to the lack of an internal audit of the TMP.

Compliance with the Requirements of the Worksite Environmental Management Plans

Twenty-five (25) findings were raised against the requirements of the WEMPs during the reporting period; one (1) Non-compliance, eleven (11) Areas for Improvement, and thirteen (13) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. Controls related to dust generation, sediment control, and tracking of mud on to roads were not always adequate.

Twenty (20) findings were closed, and twelve (12) 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.

Fourteen (14) new findings were raised during the reporting period; three (3) Non-compliances, nine (9) Areas for Improvement, and two (2) Observations. The Non-compliances all 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.

Twelve (12) findings were closed in the reporting period, and two (2) remained open.

Compliance with the Requirements of the Construction Compound Plans

One new finding was raised against the requirement of CCP-002 concerning the expansion of the compound without an approved CCP amendment.

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.

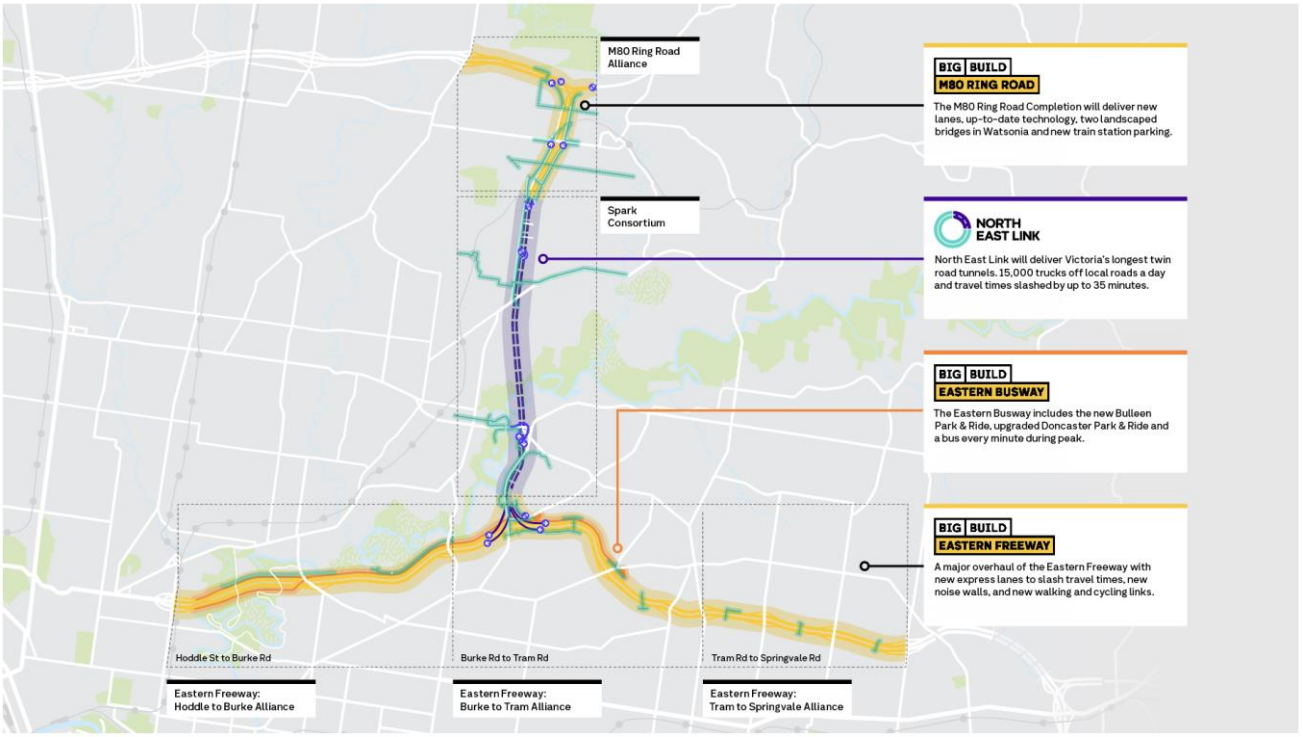

Figure 1: Schematic of the NEL works

1.2 NEL works

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

Project 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
- Templestowe 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
- Roadworks at Lower Plenty and Rivergum Walk.

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 undertaken through Sequential Excavation Method (SEM).

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 November 2024 to April 2025.

2 Environmental Management Requirements

2.1 Environmental Management Framework

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

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

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

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

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

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

The EMF documentation is summarised below in Figure 2.

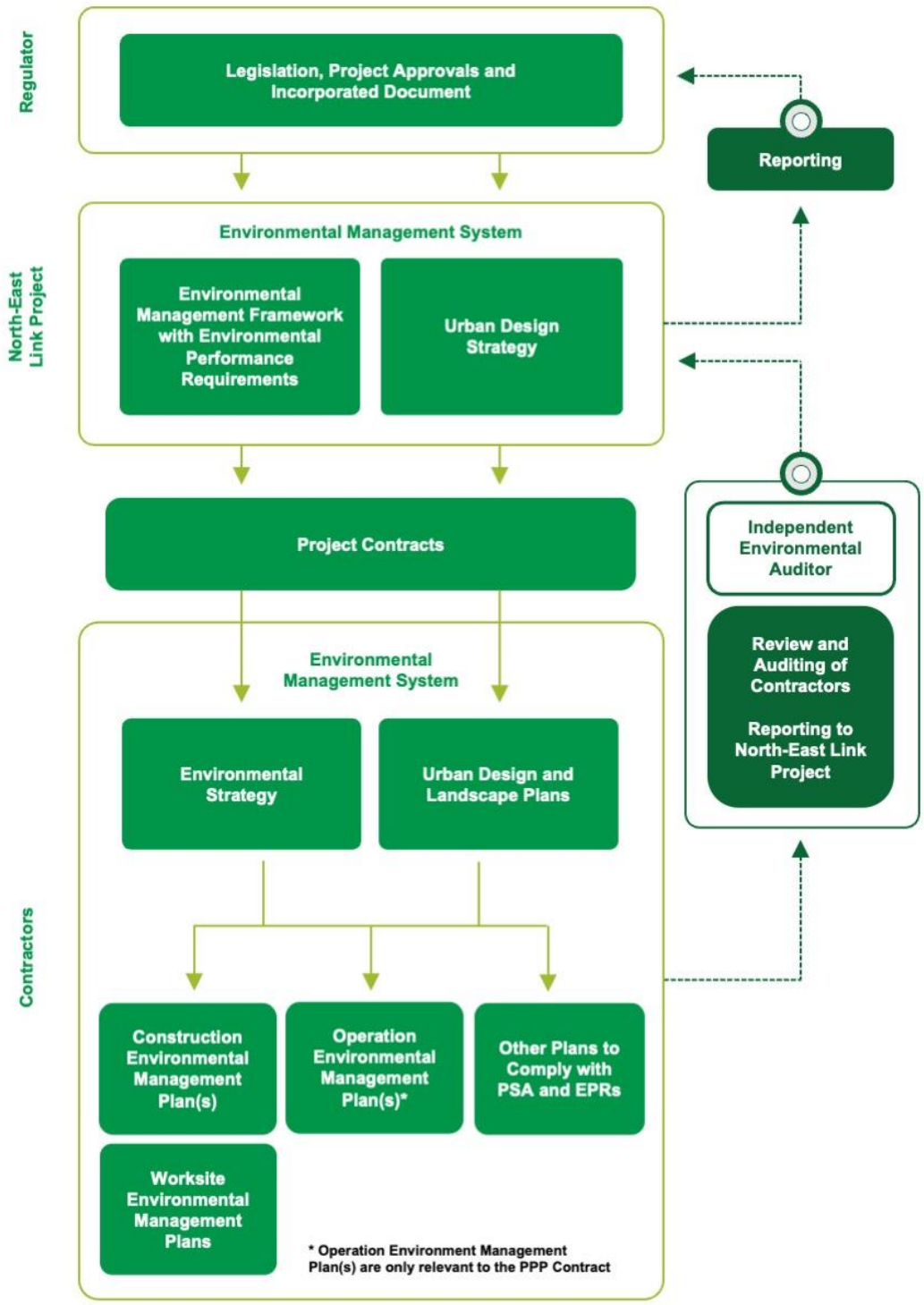

Figure 2: Environmental Documentation

(adapted from the EMF)

2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

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

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

2.3 Requirements of the EMF

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

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

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

2.3.1 Environmental Performance Requirements

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

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

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

Spark's activities and scope of works must comply with all relevant EPRs, as defined in the EMF and Table H17.1 of the PSDR (which replicates the EPRs and defines responsibilities for meeting them). Not all the requirements of the EPRs are applicable to every stage of the works, and not all the requirements are the responsibility of Spark. Of the 110 EPRs, Spark must comply with 100 of these in whole or part, and NELP is responsible for compliance with all or part of 10 EPRs

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. In addition, ten (10) EPRs for which NELP is wholly or partially 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 Spark and NELP audit as detailed in the audit program is confirmed through the following activities:

- Review of the Development Phase Program to identify the Project Activities occurring during the audit period.
- Identification of environmental risks relevant to the identified Project activities, and the related identified controls (documented in the EMP Sub Plans or other requirements). The relevant elements of the controls form part of the audit criteria.
- Review of the information gained from IEA site surveillance and results of previous audits to identify any areas in which the planned environmental arrangements may not be met.
- Review of the 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	Nov 24 (NELP EPRs)	Nov 24 (WEMP)	Dec 24 (Quarterly)	Feb 25 (WEMP)	Mar 25 (6 monthly)	Apr 25 (WEMP)
EPRs (as scheduled)	✓		✓		✓	
Environmental Strategy						
Construction Environmental Management Plan			✓ (selected elements)		✓ (all applicable elements)	
Management Plans required by the EPRs			✓ (selected plans)		✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)		✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)						

The criteria for each audit were derived from the NELP and 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
November 2024	• 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 and south bound tunnels from Watsonia to Lower Plenty • Storage of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Utility works at Rivergum Walk as part of the Eel 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.
December 2024	• Site civil works including road diversions

Audit date	Construction activities
	• 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 and south bound tunnels from Watsonia to Lower Plenty • Storage of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
February 2025	• 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 and south bound tunnels from Watsonia to Lower Plenty • Storage of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
March 2025	• 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 and south bound tunnels from Watsonia to Lower Plenty • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).

Audit date	Construction activities
April 2025	• 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 and south bound tunnels from Watsonia to Lower Plenty • Works associated with the construction of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation and Silk Street bridge works • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).

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	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-compliance
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 November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	3	6	7	2
AfI	7	27	25	9
O	2	17	12	7
Total	**12**	**50**	**44**	**18**

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

A total of fifty (50) audit findings were raised comprising six (6) Non-compliances, twenty-seven (27) Areas for Improvement, and seventeen (17) Observations.

The highest number of audit findings were raised in the December 2024 quarterly audit (see Figure 4).

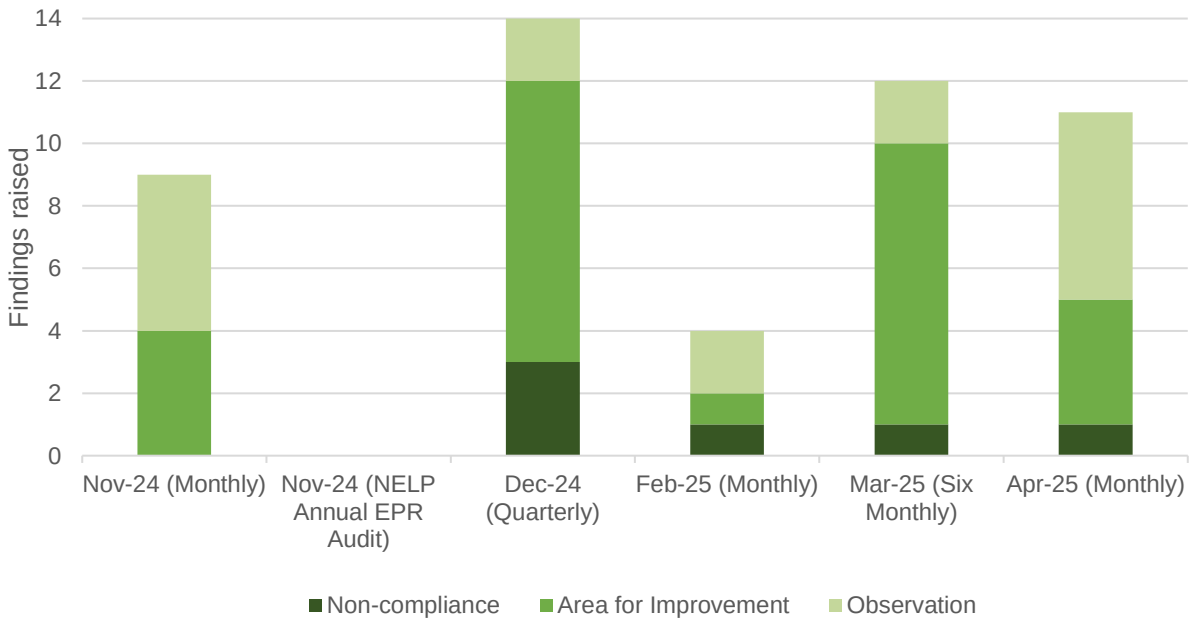

Figure 4: Audit findings by type and audit date during the reporting period

The overall number of audit findings raised in this reporting period has remained steady compared to the last reporting period. This is demonstrated by the moving average determined over two reporting periods (i.e. average of the first and second reporting periods, second and third reporting periods, third and fourth reporting periods, and so on) (see Figure 5).

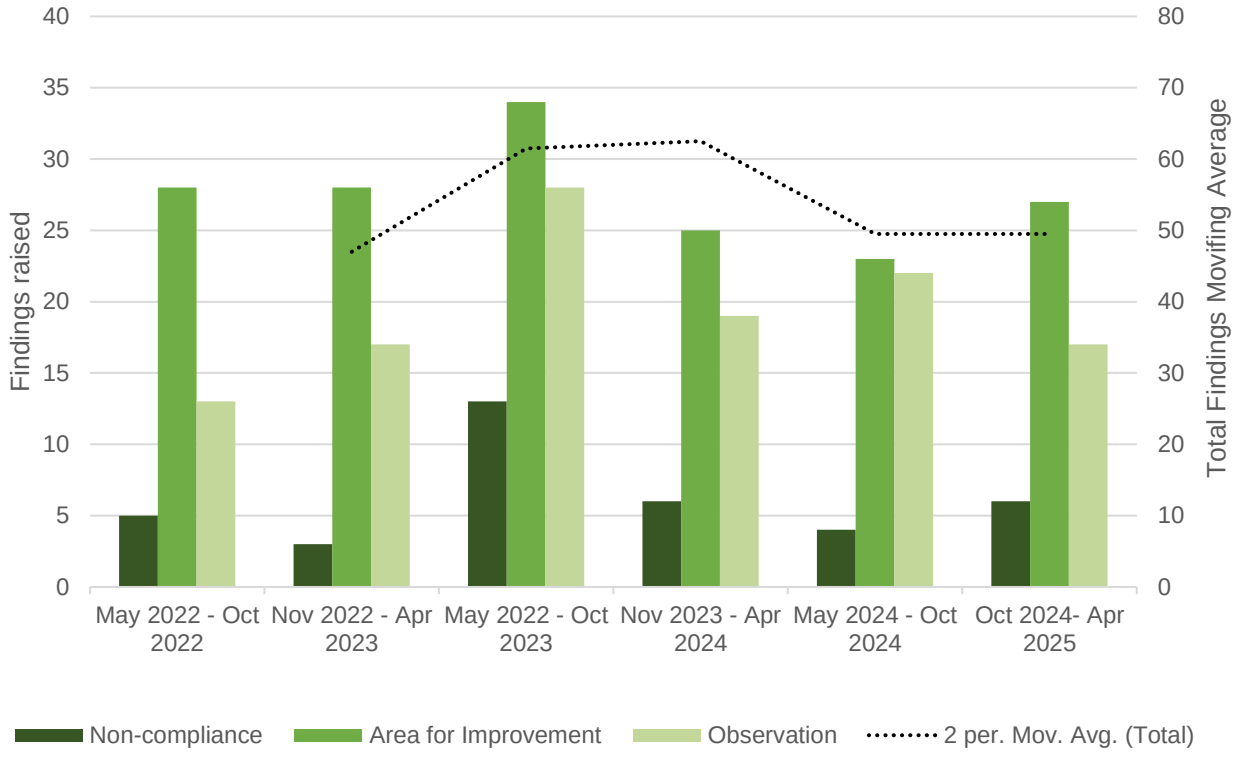

Figure 5 Audit findings by classification and reporting period.

Spark D&C established corrective actions to address audit findings. Forty-four (44) findings were closed during the reporting period. Eighteen (18) findings remained open at the end of the reporting period. (See Figure 6).

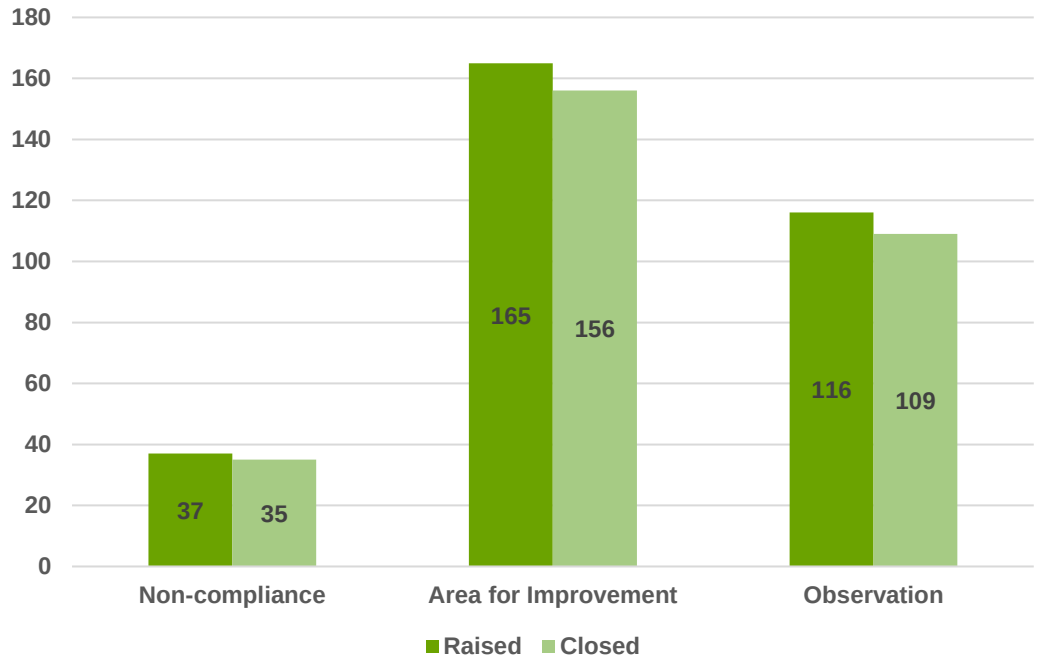

Figure 6: Cumulative audit findings raised and closed - Project commencement to April 2025

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

NELP audit

The responsibility for the implementation of some EPRs is spilt between the State (through NELP) and Spark D&C. Ten (10) EPRs for which NELP may be wholly or partially responsible were audited in relation to the Central Package activities. No findings were raised.

Spark Audits

All fifty-nine (59) planned and applicable EPRs for which Spark is responsible, and as agreed with NELP and Project Co were audited for the period. This represents more than half of the applicable EPRs. At least one EPR from the 17 EPR categories, except Aboriginal Heritage, was included in the six-month period.

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

Four (4) findings were raised against the requirements of the EPRs, one (1) Non-compliance, one (1) Area for Improvement and two (2) Observations (see Table 4). The Non-compliance was raised against EPR T2 in relation to provision of on-site parking for construction workers as Spark had not implemented all measures to minimise impacts on local streets, community and commercial facilities by providing parking for construction workers at construction compounds where practicable. This commitment to provide on-site parking was also noted in several CCPs.

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

Table 4: Summary of EPR audit findings November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	0	1	0	1
AfI	0	1	1	0
O	0	2	2	0
Total	**0**	**4**	**3**	**1**

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

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

Figure 7 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 four 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. 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.

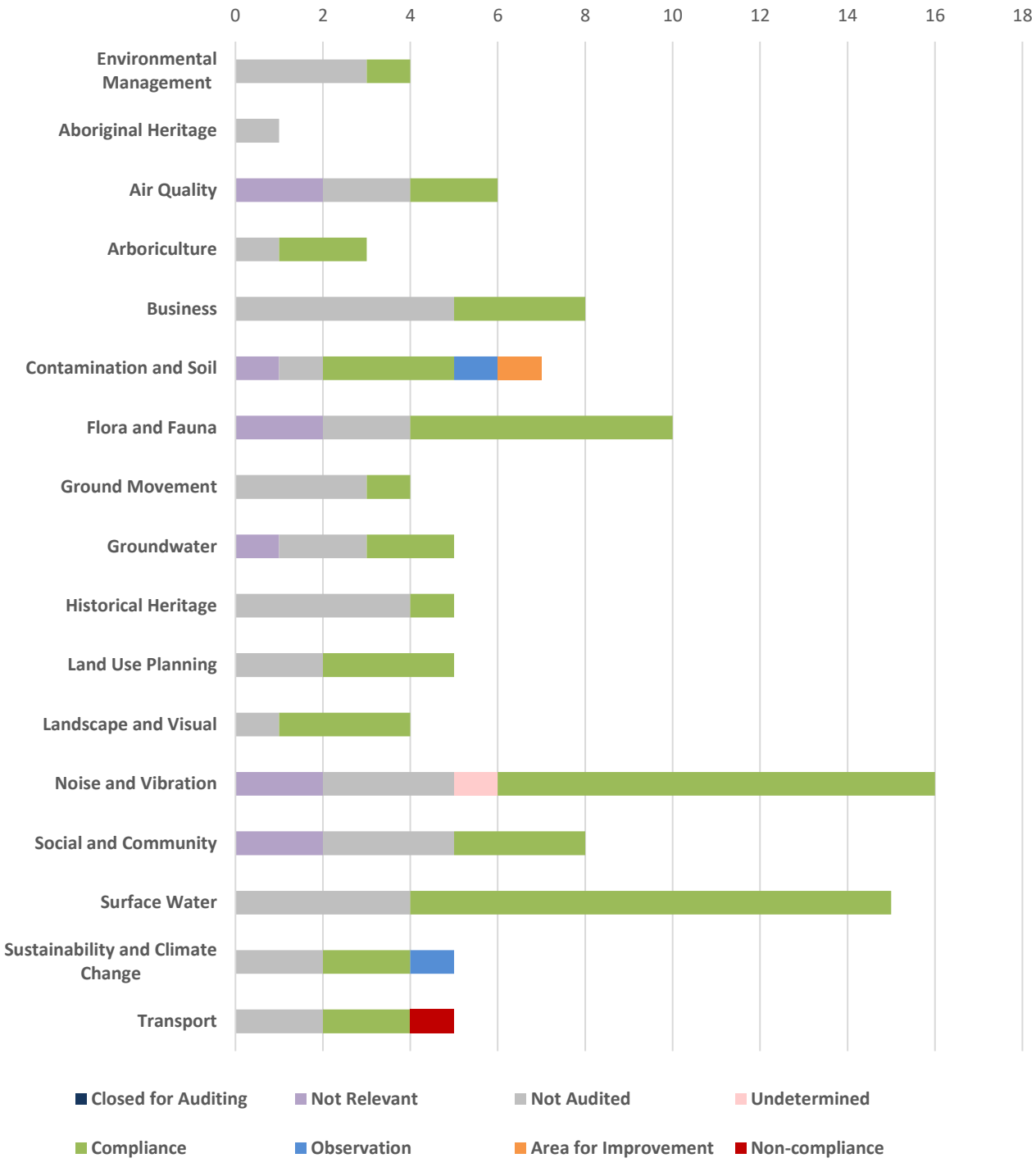

Figure 7: EPR audit findings by EPR category November 2024 to April 2025

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 Environmental Strategy was not included in the scope of audits conducted in this six month reporting period. One previous finding remained open (see Table 5).

Table 5: Environment Strategy audit findings November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	0	0	0	0
AfI	1	0	0	1
O	0	0	0	0
Total	**1**	**0**	**0**	**1**

N – Non-compliance; AfI – 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 December 2024, and an audit of all applicable elements was conducted in March 2025. Five (5) new audit findings were raised comprising no (0) Non-compliances, five (5) Areas for Improvement, and no (0) Observations. 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 November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	0	0	0	0
AfI	4	5	8	1
O	0	0	0	0
Total	**4**	**5**	**8**	**1**

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

In addition, an Area for Improvement finding was raised against the requirements of the PSDR relating to the lack of an internal audit of the TMP. This finding was closed in the reporting period.

Eight (8) previous audit findings were closed; no (0) Non-compliances, eight (8) Areas for Improvement, and no (0) Observations. One (1) finding 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-five (25) findings were raised against the requirements of the WEMPs during the reporting period;

one (1) Non-compliance, eleven (11) Areas for Improvement, and thirteen (13) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting the construction activities, to changed configurations in work sites, and to process implementation issues.

Spark made good progress in addressing the findings, with twenty (20) previous findings closed and twelve (12) remaining open (see Table 7).

Table 7: WEMP audit findings November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	3	1	4	0
AfI	2	11	7	6
O	2	13	9	6
Total	**7**	**25**	**20**	**12**

N – Non-compliance; AfI – 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 selected based on risk, were audited in December 2024 and March 2025. Fourteen (14) new findings were raised during the reporting period; three (3) Non-compliances, nine (9) Areas for Improvement, and two (2) Observations (see Table 8).

All three Non-compliances were raised against the requirements of the SWMP for uncontrolled and/or unpermitted off-site discharge of water. The other findings related to Project wide inadequate environmental controls, and to insufficient implementation of documented environmental management arrangements.

Table 8: Management Plans findings November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	0	3	3	0
AfI	0	9	8	1
O	0	2	1	1
Total	**0**	**14**	**12**	**2**

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

4.9 Implementation of Construction Compound Plans

No CCPs were formally audited in the reporting period. However, one finding was raised, a Non-compliance relating to the expansion of the site compound without an approved CCP amendment. This finding remained open at the end of the reporting period.

Table 9: CCPs findings November 2024 to April 2025

Finding Type	Open at start of Nov 2024 - Apr 2025 period	Raised during Nov 2024 - Apr 2025 period	Closed during Nov 2024 - Apr 2025 period	Open at end of Nov 2024 - Apr 2025 period
N	0	1	0	1
AfI	0	0	0	0
O	0	0	0	0
Total	**0**	**1**	**0**	**1**

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

As noted in section 4.4. the Non-compliance raised against EPR T2 also relates to several CCPs which commit to the provision of sufficient off-street parking at construction compounds for workers and visitors.

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 findings against the requirements of the WEMPs (largely related to on-ground controls) has slightly decreased but continued to make up about half of the total findings raised. The number and the nature of WEMP-related findings correspond with the scope and complexity of construction activities. However, the findings also note the need for Spark to further establish commensurate environmental controls and maintain these controls for effectiveness. The number of findings against the process documentation (the CEMP, and Sub-Plans) increased.

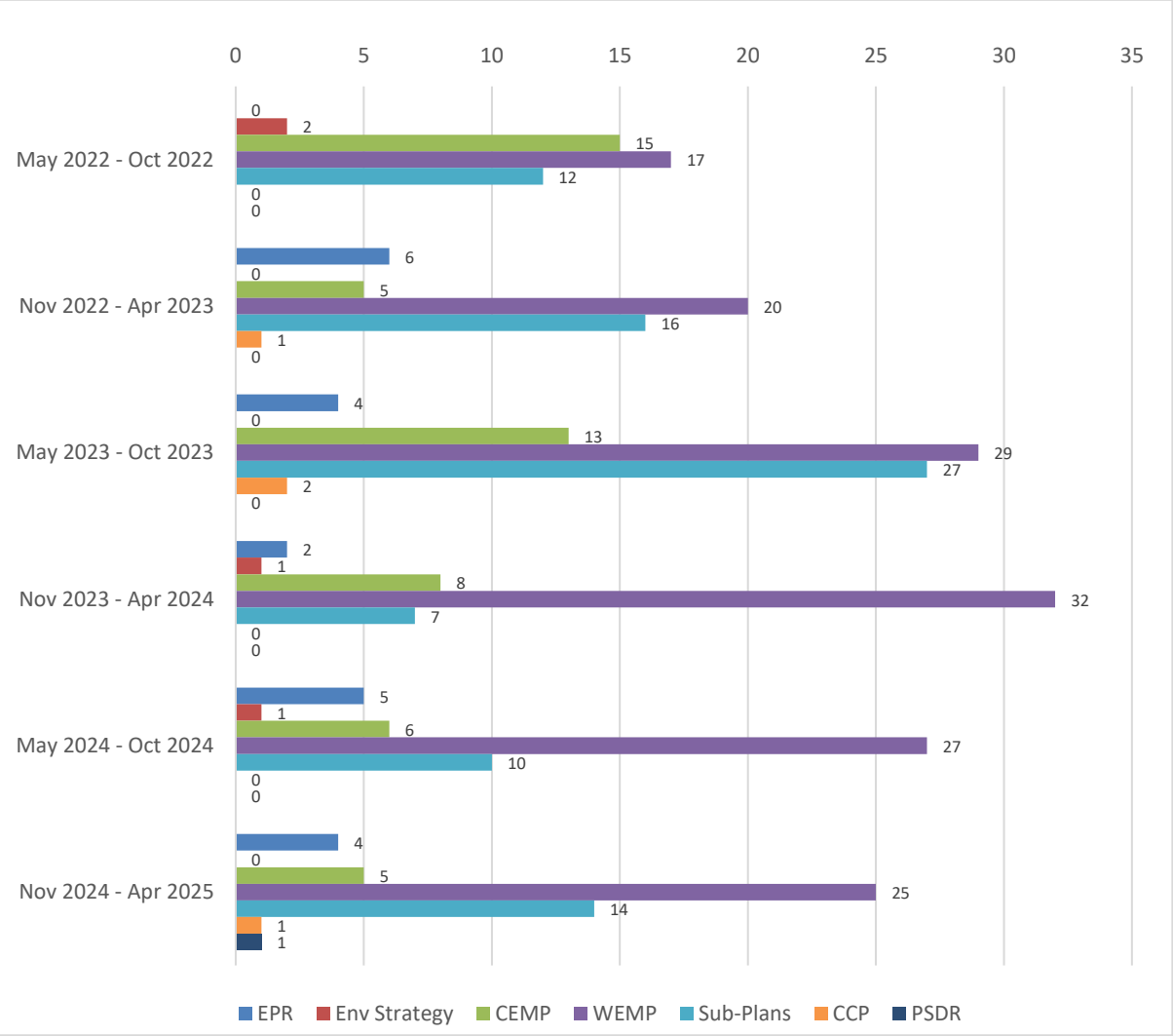

Figure 8: Audit findings by reporting periods

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

Overall, the requirements of the EPRs audited for both NELP and Spark were met.

In general, the findings raised against the EPRs for which Spark is responsible are related to minor, but project-wide inadequacies in site environmental management and do not represent a material risk to the environment.

The number of findings raised against EPRs has reduced slightly relative to the previous reporting period (see Figure 8).

5.3 Implementation of the Environmental Strategy

The Environmental Strategy provides an adequate framework for environmental management. The Environmental Strategy was not audited in the six month reporting period.

The number of findings raised against the Environment Strategy has remained low in each reporting period (see Figure 8).

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 8). Spark D&C continued to address these findings. There is a 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 the nature of the 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 and make up about half of the total findings raised (see Figure 8). The findings 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 audited reflect package wide environmental issues, with the potential for environmental harm.

The number of audit findings against the requirements of the Sub-Plan increased from the previous reporting periods (see Figure 8). 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 Minster for Planning is required by the Incorporated Document. One new audit finding was raised against the requirements of the approved CCPs.

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

Audit findings may also relate to implementation of EPRs as was the case for the findings raised against EPR T2 which relates to several CCPs by the commitment made in these CCPs for the provision of sufficient off-street parking at construction compounds for workers and visitors.

Appendix 1 – EPRs audited in the reporting period

Audit date	EPRs audited	
November 2024 (NELP audit)	Environment Management (EMF)	EMF2, EMF4
	Aboriginal Heritage (AH)	AH1
	Business (B)	B2, B3, B4
	Flora and Fauna (FF)	FF1
	Social and Community (SC)	SC2
	Sustainability and Climate Change (SCC)	SCC1, SCC2
December 2024	Environmental Management (EMF)	EMF4
	Air Quality (AQ)	AQ6
	Arboriculture	AR1, AR2, AR3
	Business (B)	B2, B3
	Flora and Fauna (FF)	FF2, FF3, FF4, FF8
	Groundwater (GW)	GW2, GW3
	Land use planning (LP)	LP2, LP3, LP5
	Landscape and visual (LV)	LV1, LV2
	Noise and Vibration (NV)	NV13, NV14
	Social and Community (SC)	SC1, SC2, SC4
	Surface Water (SW)	SW1, SW4, SW8, SW9, SW10, SW12
March 2025	Air Quality (AQ)	AQ1
	Business (B)	B5
	Contamination and Soil (CL)	CL1, CL3, CL4
	Flora and Fauna (FF)	FF1, FF6
	Ground Movement (GM)	GM4
	Historical Heritage (HH)	HH2
	Landscape and visual (LV)	LV4
	Noise and Vibration (NV)	NV1, NV3, NV6, NV8, NV9, NV10, NV11, NV12, NV15
	Surface Water (SW)	SW3, SW6, SW11, SW14, SW15
	Sustainability and Climate Change (SCC)	SCC2, SCC3, SCC5
	Traffic and Transport (T)	T1, T4

Appendix 2 – Audit findings and summary of actions taken

Audit Findings Raised During the Reporting Period

Table 10: Summary of audit findings against the Environmental Strategy

No findings were raised against the requirements of the Environmental Strategy during the reporting period.

Table 11: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Nov-24	IEA-1124-01	O	**EPR CL5:** Unbunded fuels and chemicals were observed at Bulleen Cut & Cover works area (WEMP-34) and at Watsonia Tunnelling (WEMP-31).	Unbunded fuels and chemicals continued to be observed at several works areas. This finding was closed and replaced by a new site wide finding raised against EPR CL5 (See finding IEA-1224-01). This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-24
Dec-24	IEA-1224-01	AfI	**EPR CL5:** Unbunded fuels and chemicals were observed at a number of sites across works areas.	Storage of fuels and chemicals improved across most of the works areas. A minor finding was raised relating specifically to the Winsor WEMP. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Apr-25
Feb-25	IEA-0225-01	N	**EPR T2:** Spark has not implemented all measures to minimise impacts on local streets, community and commercial facilities by providing parking for construction workers at construction compounds where practicable.	Spark is engaging with DTP, the workforce, and local councils to identify appropriate measures for parking and worker behaviour. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Feb-25	IEA-0225-02	O	**EPR SCC2 Minimise greenhouse gas emissions:** Several lights and light towers including those connected to generators and mains power at work sites in the north and the south were on during the day.	Spark has ensured that only necessary lights remain on during the day. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Apr-25

Table 12: Summary of audit findings against the CEMP

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Dec-24	IEA-1224-02	AfI	**CEMP 9.1.2 Environmental Site Inspections:** The commentary and notes recorded in the weekly environmental site inspections did not always correctly assess the condition of environmental impacts and effectiveness of site controls, in particular for dust controls and mud on roads.	Records of site Inspections in Synergy, evidenced for sites in the north and the south contained greater detailed notes and information about the environmental impacts and effectiveness of controls. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-25
Dec-24	IEA-1224-03	AfI	**CEMP 10.4 Non-Conformities:** The Spark internal NCR raised for incorrect groundwater trigger levels in GeoSens was not fully managed in accordance with Spark's procedure MSP44 Non-Conformance.	Actions on the Spark internal NCR raised for incorrect groundwater trigger levels in GeoSens were closed and communicated with NELP as per the Spark NCR process. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Apr-25
Feb-25	IEA-0225-03	AfI	**CEMP 7.5 Environment in Design:** Design documentation, including the identification and inclusion of all relevant Environmental Requirements for the temporary dewatering system at the Smoke Shaft/AMCC building could not be provided.	The dewatering system was expanded to include additional capacity and treatment capability. Dewatering has occurred under approved dewatering permits. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-02	AfI	**CEMP 6.5 Environment in Design:** The systematic process for environmental reviews of post IFC design changes and DCNs was not fully documented or implemented.	The review process for post-IFC design includes the use of a Design Change Notice form which contains a question on anticipated impacts on EPR compliance to determine the involvement of the Environment Team in the design change review. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Apr-25

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Mar-25	IEA-0325-03	AfI	**CEMP 9.5.1 Corrective and Preventive Actions:** Tracking of preventative and corrective actions for findings other than non-compliances was not being completed in accordance with the documented processes in the CEMP and MSP169-NEL EMS	Actions to address this finding were not yet complete. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

Table 13 Summary of findings against the PSDR

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Mar-25	IEA-0325-01	AfI	**PSDR Part F1 1.11 Audit, monitoring and verification:** TMP has not been audited as part of the Spark internal audit program.	**April 2025:** The TMP audit had been scheduled for 29 May 2025. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Apr-25

Table 14: Summary of audit findings against the WEMPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Nov-24	IEA-1124-03	O	**WEMP-32 Lower Plenty 7.1 Environmental Monitoring Management Plan – Air Quality:** The PM2.5 and PM10 alarm levels set in SiteHive were incorrectly labelled.	Spark corrected the alarm levels labels. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-24
Nov-24	IEA-1124-04	AfI	**WEMP-32 Lower Plenty 9 Environmental Aspects Air Quality:** Raised dust was observed on Greensborough Road as a result of mud tracking leaving Lower Plenty.	Street sweeping and deep cleaning of road areas was implemented by Spark. Additional actions to implement and maintain effective mud tracking controls at Lower Plenty was ongoing. At the time of the April audit, there was no raised dust observed on Greensborough Road. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Nov-24	IEA-1124-05	AfI	**WEMP-32 Lower Plenty 9 Environmental Aspects Air Quality:** Dust was observing leaving site from the former Blamey carpark excavation works.	Controls were implemented to manage dust from the excavation at the former Blamey car park. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Dec-24
Nov-24	IEA-1124-06	O	**WEMP-32 Lower Plenty 9 Environmental Aspects Contamination and Spoil:** A spoil truck was observed leaving site with an uncovered load.	Spoil trucks observed during subsequent audits had loads covered. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-24
Nov-24	IEA-1124-07	O	**WEMP-32 Lower Plenty 9 Environmental Aspects Contamination and Spoil:** A spoil truck was observed leaving site after bypassing the rumble grid.	Spoil trucks observed during subsequent audits leaving Lower Plenty did not bypass the rumble grid. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-24
Nov-24	IEA-1124-08	O	**WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water:** Excess dust	The pooled dust suppression polymer had been removed and the drain observed to be clean in a subsequent audit.	Closed	Dec-24

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			suppression polymer runoff had pooled in a Lower Plenty spoon drain.	This finding related to on-site environmental controls and represented a low risk to the environment.		
Nov-24	IEA-1124-09	AfI	**WEMP-34 Bulleen 9 Environmental Aspects Air Quality:** Mud tracking was observed on Bulleen Road at the old Trinity Swim Centre Exit (Marcellin access road).	Street sweeping and deep cleaning of road areas was implemented by Spark. Controls were observed to be in place at the Marcellin access road exit. At the time of the April audit, there was no raised dust observed on Bulleen Road near the Marcellin access road. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Dec-24	IEA-1224-09	AfI	**WEMP-18 9 Environmental Aspects Arboriculture / Flora and Fauna:** Paddles Laydown Yard. No Go Zones and/or TPZs had not been established. Vegetation identified during site inspection is not included in the WEMP or SEP.	Recommendations and mitigation measures as advised by the Spark arborist had been implemented. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Mar-25
Dec-24	IEA-1224-10	AfI	**WEMP-18 9.1 Site Environmental Plans:** Paddles Laydown Yard. Environmental controls were not installed for sediment and erosion control as per SEP.	At subsequent audits it was noted that installation of sediment and erosion controls continued with sediment fences installed at the low points along the north eastern boundary, however it was noted that the sediment fencing had not being installed correctly and required rectification. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Dec-24	IEA-1224-11	N	**WEMP-20 9. Environmental Aspects – Surface Water:** Ineffective implementation of controls led to sediment laden water and mud tracking on Greensborough Rd from spoil trucks leaving the Winsor Spoil Shed	Implementation of the existing controls and implementation of new controls were observed to have minimised mud tracking by spoil trucks exiting the Winsor Reserve spoil shed. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-25

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Dec-24	IEA-1224-12	AfI	**WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water**: Not all ERSED controls at Lower Plenty were in place or effective to prevent mud tracking on Greensborough Road.	While actions to improve the mud tracking impacts on Greensborough Road from street sweeping and deep cleaning was in place (as per finding IEA-1124-04), the effectiveness of controls to prevent mud from the site required further attention and improvement. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Dec-24	IEA-1224-13	AfI	**WEMP-33 9 Environmental Aspects – Surface Water:** Concrete washout and disposal of excess concrete with the use of concrete wash bags or equivalent containment was observed on the flood bund between Trinity Dam and the upstream wetlands.	At a subsequent audit it was observed that the area had been cleaned with only crushed rock observed in the area. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-25
Dec-24	IEA-1224-14	O	**WEMP-34 – 9 Environmental Aspects – Groundwater**: Groundwater recharge wells at Trinity North were unprotected and surrounded by sediment laden construction water, rubbish, and debris.	At a subsequent audit it was observed that the recharge wells had been protected and the area cleaned of debris. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Feb-25
Feb-25	IEA-0225-04	O	**WEMP-33 2.3 Key Reference Documents Secondary Approvals:** A high iron trade waste result from the Bulleen SRD water treatment plant had not been recorded in Synergy, noting that the water authority had been notified.	The event was recorded in Synergy. The sample line was also cleaned and flushed and recent samples shows iron was back within the compliance limits. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Mar-25
Mar-25	IEA-0325-11	O	**WEMP-34 9.1 Site Environmental Plans:** The updated Trinity SEM SEP had not yet been communicated to the workforce.	The Trinity SEM SEP had been communicated to the workforce at a pre-start held in March 2025. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Apr-25
Apr-25	IEA-0425-01	O	**WEMP-20 Winsor 9.0 Environmental Aspects – Contamination and Spoil:** An	Actions to address this finding are to be reviewed during the next reporting period..	Open	

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			unbunded hydrocarbon container was observed at Winsor.	This finding related to on-site environmental controls and represented a low risk to the environment.		
Apr-25	IEA-0425-03	AfI	**WEMP-31 Watsonia Tunnels 7.1 Environmental Monitoring Management Plan (Noise):** The compliance noise monitors NEL01 and NEL12 were offline and not reporting**.**	Actions to address this finding are to be reviewed during the next reporting period. This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Apr-25	IEA-0425-04	O	**WEMP-32 Lower Plenty 9 Environmental Aspects Contamination and Spoil:** A spoil truck was observed leaving site with an uncovered load.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a low risk to the environment.	Open	
Apr-25	IEA-0425-05	AfI	**WEMP-32 Lower Plenty 9 Environmental Aspects – Noise and vibration:** Protective noise blankets to mitigate noise emissions from the desanding plant generators were not properly installed or maintained.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Apr-25	IEA-0425-06	O	**WEMP-32 Lower Plenty 9 Environmental Aspects: Noise and Vibration:** An elevated work platform at Lower Plenty was observed in use with a tonal reverse beeper**.**	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a low risk to the environment.	Open	
Apr-25	IEA-0425-07	AfI	**WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water:** Installation of the FOD mats at gate GB06 and the Rivergum (Zone 3) exit were inadequate.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Apr-25	IEA-0425-08	O	**WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water:** The Lower	Actions to address this finding are to be reviewed during the next reporting period. .	Open	

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			Plenty water treatment plant bund drainage valves were all in the open position.	This finding related to on-site environmental controls and represented a low risk to the environment.		
Apr-25	IEA-0425-09	O	**WEMP-34 Bulleen 9.0 Environmental Aspects – Contamination and Spoil:** Diesel spillage was observed on the ground at the refuelling point of the self-bunded refuelling pod at Trinity South.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a low risk to the environment.	Open	
Apr-25	IEA-0425-10	AfI	**WEMP-34 Bulleen 9 Environmental Aspects – Surface Water:** Not all controls to manage mud tracking at gate B7 had been installed.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a medium risk to the environment.	Open	
Apr-25	IEA-0425-11	O	**WEMP-34 Bulleen 7.1 Environmental Monitoring Management Plan (Surface Water):** Post rainfall monitoring results for April had not been reviewed and verified to ensure accuracy and validity.	Actions to address this finding are to be reviewed during the next reporting period. . This finding related to on-site environmental controls and represented a low risk to the environment.	Open	

Table 15: Summary of audit findings against the Management Plans

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Nov-24	IEA-1124-02	AfI	**CNVMP 8.2 Out of Hours Works:** Unavoidable OOH permits had expired in Civillo including POH-NSW-273 for the Lower Plenty main box excavation and POH-TBM-22 for operations including ancillary facilities.	Spark revised the two permits with monitoring in place to support compliance for the permitted activities. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-24
Dec-24	IEA-1224-04	AfI	**CNVMP – 7.6.2 Permit to Work Out of Hours:** The permitting process used in Civillo differs from the process described in the CNVMP and the Spark OOHW Procedure (MSP115-NEL Out of Hours).	Spark revised the OOHW Procedure to reflect the processes in Civillo. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-25
Dec-24	IEA-1224-05	AfI	**SpMP 10.5.1 Weighbridge Waiver Process**: Where trucks were unable to use an on-site weighbridge or a receival weighbridge, Spark has not requested a waiver for the requirements to provide site weighbridge dockets for previous ICAN reporting periods.	Spark requested and received waivers issued by NELP. Processes are in place and ongoing for future ICAN periods. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-25
Dec-24	IEA-1224-06	N	**SWMP 6.3.3 Stormwater and Dewatering Management:** Controlled discharge from Trinity Dam occurred following a rainfall event without a permit to discharge or in accordance with Spark's Dewatering and Discharge Procedure.	The unpermitted controlled discharge from Trinity Dam was conducted following a high rainfall event and in anticipation of further forecast rainfall to maintain adequate flooding capacity in the Dam to prevent inundation of construction areas, Bulleen Road, and the Trinity Access Road. The discharge event was subsequently raised as an incident by Spark. Actions to prevent a recurrence were identified and implemented. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Feb-25

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Dec-24	IEA-1224-07	N	**SWMP 6.3.3 Stormwater and Dewatering Management:** Controlled discharge of pooled water at Manningham was observed without a permit to discharge or in accordance with Spark's Dewatering and Discharge Procedure.	The unpermitted controlled discharge of pooled water from Manningham was raised as an incident by Spark. Actions to prevent a recurrence were identified and implemented. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Feb-25
Dec-24	IEA-1224-08	O	**SMP 4.5.2 The D&C Contractor's Sustainability Data Monitoring Platform:** The recycled material content was under reported as not all steel suppliers had provided the required data.	Spark sent correspondence to steel suppliers requesting recycled content data. Where data had been received, the Material Recycled Content Dashboard had been updated. This finding related to documented sustainability management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-25
Mar-25	IEA-0325-04	AfI	**EcMP 4.2.2 Tree Protection Plan:** Recommendations and measures to protect trees included in the tree protection plan for the northern surface works had not been formally captured or tracked for implementation.	Actions and recommendations from the arborist quarterly report had been identified and tracked in a table circulated with the environment team responsible for trees in the north. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-05	AfI	**GWMP 11 Trigger values:** The Master Spreadsheet used for tracking all groundwater wells does not contain all relevant information.	Spark has reviewed and updated the master spreadsheet and it has been provided to NELP and the IREA. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-06	AfI	**GWMP Appendix E – GDE Monitoring Plan:** Recommendations and actions from GDE monitoring reports have not been formally captured or tracked for implementation across all project sites.	Spark captured and tracked the actions raised in the GDE reports. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Apr-25

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Mar-25	IEA-0325-07	N	**SWMP 6.3.3 Stormwater and Dewatering Management:** Construction water was discharged from Vent Tunnel/AMCC building site without a discharge permit and not meeting ERS requirements.	The construction water management arrangements at the Vent Tunnel/AMCC building site were reconfigured to allow for reduction on the amount of water requiring discharge, and to provide for treatment. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-08	AfI	**SWMP 7.1 Water quality control measures:** Not all public roads were free of construction dirt and mud to prevent contamination of stormwater during rain events.	Spark installed additional sediment controls at most site exit points. At the subsequent audit, roads in the north and south had been cleaned. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-09	AfI	**SWMP 7.1 Water quality control measures:** Sediment and erosion controls required maintenance and repairs.	Sediment and erosion controls had been maintained and repaired. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
Mar-25	IEA-0325-10	AfI	**SMP 2.3 Objectives and Targets:** The methodology used in the Spark Urban Heat Island Report (Rev 3) and the impact study outcomes were not consistent with the sustainability target specified in the SMP (Table 3) of no net increase in the % change in average temperature.	The SMP was to be updated during the next revision cycle to reflect current approach to the Urban Heat Island impacts. This was not complete during the reporting period. This finding related to documented sustainability management arrangements and did not represent an immediate material risk to the environment.	Open	
Mar-25	IEA-0325-12	O	**DAQMMP 9.1.2 Monitoring program:** The weather monitoring station at Watsonia was not integrated into the monitoring program, noting that data from the nearest Bureau of Meteorology was used being as a temporary proxy.	The DAQMMP was to be updated during the next revision cycle to reflect the use of the Bureau of Meteorology weather monitor as a temporary proxy. This was not 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	

Table 16: Summary of audit findings against the CCPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Apr-25	IEA-0425-02	N	**CCP-002 Watsonia TBM Compound or WEMP-0031 Watsonia Tunnels 2.3 Key Approvals:** The Watsonia TBM construction compound had been expanded without an approved CCP.	Actions to address this finding are to be reviewed during the next reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

Table 17: Previous open audit findings

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
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.	Spark revised the TMP and CCEMP to allow for on-street construction vehicle parking where agreement with the relevant local council had been obtained. Note that a related finding (IEA-0225-01) was raised in February 2025 against the requirements of EPR T2 relating to measures to minimise on street parking. This finding remains open. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Mar-25
Mar-24	IEA-0324-02	AfI	**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 revised the references in the CEMP and the updated CEMP has been reissued This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-25
Mar-24	IEA-0324-05	AfI	**CEMP 9.5.1 Corrective and Preventive Actions:** Verification of the effectiveness of actions is not currently formalised.	Spark has revised the processes in the CEMP for verification of the effectiveness of corrective actions and the updated CEMP has been reissued as Rev 04 and was in use. The EMS procedure has been finalised and communicated to the Environmental Team. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-25
Jun-24	IEA-0624-04	AfI	**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 incident investigation and reporting matrix was revised to include additional information specific to classifying the severity and reporting of environmental incidents.	Closed	Nov-24

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Jun-24	IEA-0624-13	O	**WEMP 32 9 Environmental Aspects: Contamination and spoil:** The Lower Plenty wheel wash was not operational.	Improvements were made to the wheel was at Lower Plenty and it was found to be effective in a subsequent audit. However, mud tracking at Lower Plenty continued to be an issue. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Dec-24
Jun-24	IEA-0624-15	AfI	**WEMP-32 9 Environmental Aspects: Surface Water Management:** Banyule Creek monitoring records have not been evaluated to determine impacts from potential construction related sources.	Monitoring data has been compiled and analysed against rainfall events. There was no apparent or obvious correlation between the background water quality in Banyule Creek, upstream data and rainfall events. Spark continues to manage surface water and control surface water from adverse impacts associated with its construction activities. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25
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.	Trinity Dam continued to be used as a construction wastewater collection pond. The dam is used to capture clean stormwater diverted from Marcellin College stormwater. Controls were in place to maintain levels in the dam to allow for high rain fall events. Spark conducted a risk assessment for the repurposed use with additional controls identified to mitigate any long-term impacts identified including the reinstatement of the Dam to meet the UDLP design and the end use criteria as agreed with associated landowners. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Mar-25

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jul-24	IEA-0724-01	AfI	**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.	Spark has submitted the WTP plans to YVW. The plans were accepted by YVW. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Nov-24
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.	The updated TWA tracking spreadsheet include all relevant monitoring and sampling requirements from current TWAs. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-24
Sep-24	IEA-0924-01	AfI	**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.	The Environmental Strategy revision cycle was underway. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
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.	Actions and recommendations from the updated Tree Protection Plan and the Arboricultural Impact Assessment were being implemented. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-24
Oct-24	IEA-1024-01	AfI	**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.	The first groundwater recharge wells at Trinity North have been commissioned and were operational. Remaining wells to be progressively commissioned as defined in the commissioning plan. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Apr-25

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