



# WEST GATE TUNNEL PROJECT

Independent Reviewer and Environmental Auditor  
Final Report for Submission to the Minister for Planning –  
March 2024 to August 2024



# WEST GATE TUNNEL PROJECT

## Independent Reviewer & Environmental Auditor

Final Audit Report for Minister of Planning

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# CONTENTS

<b>EXECUTIVE SUMMARY .....</b>	<b>6</b>
<b>GLOSSARY OF TERMS &amp; ABBREVIATIONS .....</b>	<b>8</b>
<b>1 INTRODUCTION.....</b>	<b>10</b>
<b>1.1 Purpose of this Report.....</b>	<b>10</b>
<b>1.2 Project Background .....</b>	<b>10</b>
1.2.1 West Gate Tunnel Project .....	10
1.2.2 Planning and Environment Approvals .....	11
1.2.3 Environmental Management Strategy .....	14
1.2.4 Construction Environmental Management Plan .....	14
1.2.5 Worksite Environmental Management Plans.....	15
<b>1.3 Role of the IREA .....</b>	<b>16</b>
1.3.1 Regular Site Inspections / Surveillance .....	16
1.3.2 Design and Construction Documentation Review .....	16
1.3.3 Management Plan Review .....	16
1.3.4 Minister's Report .....	17
<b>1.4 Report Structure.....</b>	<b>17</b>
<b>2 CONDUCT OF AUDITS .....</b>	<b>18</b>
<b>2.1 Audit Objectives .....</b>	<b>18</b>
<b>2.2 IREA Auditing Process .....</b>	<b>18</b>
<b>2.3 Audit Scope .....</b>	<b>18</b>
2.3.1 Design and Construction Activities – March 2024 to August 2024 .....	20
<b>2.4 Audit Findings Classification .....</b>	<b>22</b>
<b>3 SIX-MONTHLY AUDIT FINDINGS .....</b>	<b>24</b>
<b>3.1 Environmental Management Strategy .....</b>	<b>24</b>
<b>3.2 Environmental Performance Requirements.....</b>	<b>24</b>
3.2.1 Environmental Management .....	24
3.2.2 Air Quality.....	24
3.2.3 Business.....	25
3.2.4 Cultural Heritage .....	25
3.2.5 Contaminated Soil and Spoil Management .....	25
3.2.6 Ecology .....	26
3.2.7 Greenhouse Gas Emissions.....	26
3.2.8 Ground Movement.....	26
3.2.9 Groundwater .....	26
3.2.10 Land Use.....	26

3.2.11 Landscape and Visual .....	26
3.2.12 Noise and Vibration .....	27
3.2.13 Social .....	27
3.2.14 Surface Water .....	27
3.2.15 Transport.....	28
3.2.16 Waste Management .....	28
<b>3.3 Construction Environmental Management Plan.....</b>	<b>28</b>
3.3.1 Air Quality Management Plan.....	28
3.3.2 Construction Noise and Vibration Management Plan .....	29
3.3.3 Energy Management Plan.....	29
3.3.4 Flora and Fauna Management Plan .....	29
3.3.5 Ground Movement Management Plan.....	29
3.3.6 Groundwater Management Plan .....	29
3.3.7 Hazardous Substances Management Plan .....	30
3.3.8 Heritage Management Plan.....	30
3.3.9 Lighting Management Plan.....	30
3.3.10 Soil and Spoil Management Plan .....	30
3.3.11 Waste Management Plan .....	31
3.3.12 Water Management Plan.....	31
3.3.13 Landscape Management Plan.....	31
3.3.14 Business Involvement Plan .....	32
3.3.15 Construction Communications and Community Engagement Plan .....	32
<b>3.4 Worksite Environmental Management Plan.....</b>	<b>32</b>
3.4.1 West Zone.....	32
3.4.2 Tunnel Zone .....	33
3.4.3 East Zone.....	33
<b>4 AUDIT CONCLUSIONS.....</b>	<b>35</b>
<b>APPENDIX A – EPR AUDITING STATUS .....</b>	<b>37</b>
<b>APPENDIX B – IREA SPECIALIST TEAM.....</b>	<b>46</b>
<b>APPENDIX C – AUDIT LIMITATIONS.....</b>	<b>48</b>

## **TABLES**

Table 1 – Status of CEMP and subplans.....	15
Table 2 – Summary of Audits Conducted During Reporting Period – March 2024 to August 2024. ....	20

## **FIGURES**

Figure 1 – Governance Framework for the Project Environmental Management Strategy (adapted from Strategy 2018) .....	13
Figure 2 – Relationship between environmental management framework and Project design and construction documentation. ....	14
Figure 3 – Overview of environmental audit process .....	19

## **PHOTOS**

Photo 1 – Tunnel Zone (Source: WGTP MRPV, 3 July 2024) .....	22
Photo 2 – Wurundjeri Way – East Zone (Source: WGTP MRPV, 3 July 2024) .....	23
Photo 3 – Maribyrnong River - East Zone (Source: WGTP MRPV, 27 July 2024) .....	25
Photo 4 – Footscray Road – East Zone (Source: WGTP MRPV, 4 March 2024) .....	27
Photo 5 – Footscray Road – East Zone (Source: WGTP MRPV, 3 July 2024).....	31
Photo 6 – Footscray Road Veloway – East Zone (Source: WGTP MRPV, 3 July 2024) .....	34
Photo 7 – Northern Portal – Tunnel Zone (Source: WGTP MRPV, 3 July 2024).....	36

## **APPENDICES**

**APPENDIX A – EPR AUDITING STATUS**

**APPENDIX B – IREA SPECIALIST TEAM**

**APPENDIX C – AUDIT LIMITATIONS**

## EXECUTIVE SUMMARY

### Introduction

This report summarises the environmental audit findings of the Independent Reviewer and Environmental Auditor (IREA) for the West Gate Tunnel Project (the Project) in Melbourne, Victoria. It covers the six-monthly audit of the Environmental Management Strategy (the Strategy), quarterly Construction Environmental Management Plan (CEMP) audits, and monthly audits of the Worksite Environmental Management Plans (WEMP) which occurred during the construction period from March 2024 to August 2024.

This is the thirteenth IREA Minister's Report, which is required to be issued every six months to the Victorian Minister for Planning and made available to the public on the Project website.

Construction on the Project has been underway since March 2018. Recent activities have been concentrated on the widening of the West Gate Freeway, fit out of the tunnel, and structural works for the various bridges along the eastern and western portion of the Project.

### Overview of Findings

Overall, Project Co was found to be meeting their obligations under the Strategy. No adverse findings were raised with Project Co during the Strategy audit.

Project Co / D&C Subcontractor is generally compliant with the Environmental Performance Requirements (EPR).

During this reporting period the IREA approved one revised environmental management plans, which was the Soil and Spoil Management Plan (SSMP).

The IREA's future auditing program will continue to focus on how Project Co and the D&C Subcontractor demonstrate compliance with Project environmental requirements. Project Co and the D&C Subcontractor have continued to provide evidence to close out audit findings, including one CEMP findings (one opportunity for improvement), two WEMP findings (two opportunities for improvement) and one EPR finding (one opportunity for improvement) closed out since the previous reporting period.

A summary of the findings raised during this reporting period is below.

### Environmental Management Strategy

Project Co is generally meeting their obligations under the Strategy. No adverse findings were raised during this reporting period.

No findings remain open from previous reporting periods.

These findings are detailed further in Section 3.1 of the report.

### Environmental Performance Requirements

During the last six-month reporting period the IREA formally audited 44 EPRs. All EPRs audited during the reporting period were deemed compliant. The findings raised consisted of:

- No non-conformances were raised during this audit period.
- No opportunities for improvement were raised during this audit period.
- No observations were raised during this audit period.

One opportunity for improvement was closed against Business (BP5) from previous reporting periods. In total there are 6 findings remaining open at the end of this reporting period, comprising of 6 opportunities for improvement. The IREA will continue to work with Project Co/D&C Subcontractor to close out any outstanding findings.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status and the upcoming EPR auditing schedule.

## Construction Environmental Management Plan

The last six-month reporting period focused on auditing a range of CEMP elements and subplans.

The CEMP audit findings for the May 2024 quarterly audit are summarised below:

- No non-conformances were raised during this audit.
- One opportunity for improvement was raised during this audit.
- No observations were raised during this audit.

The CEMP audit findings for the August 2024 quarterly audit are summarised below:

- No non-conformances were raised during this audit.
- No opportunities for improvement were raised during this audit.
- One observation was raised during this audit.

One opportunity for improvement was closed from previous reporting periods against the Water Management Plan. In total there are 2 findings remaining open at the end of this reporting period, comprising 2 opportunities for improvement. The IREA will continue to work with Project Co / D&C Subcontractor to close out any outstanding findings.

Details of the CEMP findings are listed in Section 3.3.

## Worksite Environment Management Plans

During the reporting period six WEMP audits were conducted. A total of twelve findings were raised in this reporting period. These consisted of:

- No non-conformances.
- Three opportunities for improvement.
- Nine observations.

The D&C Subcontractor has continued their system processes and environmental management on site, with the number of new audit findings rising slightly from eleven findings in the previous reporting period to twelve during this reporting period. Two opportunities for improvement were closed during this reporting period. In total there are zero (0) WEMP audit findings remaining open.

The WEMP findings are further detailed in Section 3.4.

## Conclusions

The findings arising from the reporting period by the IREA have not identified any immediate significant or material risks to the environment.

Implementation of the EPRs was found to be generally compliant, with zero (0) opportunities for improvement and zero (0) observations during the reporting period.

Four audit findings from previous reporting periods were closed, including one CEMP finding (one opportunity for improvement), two WEMP findings (two opportunities for improvement) and one EPR finding (one opportunity for improvement). In total there are 8 findings remaining open at the end of this reporting period, comprising 8 opportunities for improvement. The IREA will continue to work with Project Co/D&C Subcontractor to close out any outstanding findings.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status and the upcoming EPR auditing schedule.

Progress in closing out audit findings has remained steady. The IREA encourages continued efforts by Project Co and the D&C Subcontractor to close out remaining open audit findings.



## GLOSSARY OF TERMS & ABBREVIATIONS

AQMP	Air Quality Management Plan
ATCR	Alternative Traffic Control Room
BIP	Business Improvement Plan
BOM	Bureau of Meteorology
CPBJH	Design and Construction Subcontractor (D&C Subcontractor)
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CD	Certified Design
CHMP	Cultural Heritage Management Plan
CSM	Conceptual Site Model
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMP	Energy Management Plan
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPR	Environmental Performance Requirements
FCC	Freeway Control Centre
FFMP	Flora and Fauna Management Plan
FRP	Formwork, reo and pour
GHG	Greenhouse Gas
GMMP	Ground Movement Management Pan
GWMP	Groundwater Management Plan
HMP	Heritage Management Plan
HSMP	Hazardous Substances Management Plan
HPAMP	Historic Places and Archaeological Management Plan
IREA	Independent Reviewer and Environmental Auditor
ISCA	Infrastructure Sustainability Council Australia
LMP	Lighting Management Plan
JASANZ	Joint Accreditation System of Australia and New Zealand
ME&I	Mechanical, Electrical and Installation
NML	Noise Management Levels
NYMS	North Yarra Main Sewer
OSP	Outbound Southern Portal
PPP	Public Private Partnership
PSA	Planning Scheme Amendment
PSR	Project Scope & Requirements (Project Agreement or Contract)
SAQPs	Sampling Analysis and Quality Plans
SEPP	State Environment Protection Policy

West Gate Tunnel Project

SSMP	Soil and Spoil Management Plan
WEMP	Worksite Environment Management Plan
WGTP MRPV	West Gate Tunnel Project Major Road Projects Victoria (the State)
WMP	Water Management Plan
WstMP	Waste Management Plan
XP	Cross passage

# 1 INTRODUCTION

## 1.1 Purpose of this Report

This report summarises the Independent Reviewer and Environmental Auditor (IREA) audit findings from the thirteenth six-month period of construction of the West Gate Tunnel Project (the Project) in Melbourne, Victoria.

The IREA has been jointly appointed by West Gate Tunnel Project, Major Road Projects Victoria (WGTP MRPV) and Transurban WGT Co Pty (Project Co) to provide independent oversight of design engineering, construction, program and environmental performance of the Project. The IREA undertakes audits, review of documentation and site surveillance of Project activities to assess whether conformance with Project requirements is being achieved. This includes the Environmental Performance Requirements (EPR) issued by the Minister for Planning in December 2017.

During the reporting period the IREA audited Project Co (responsible for delivering the Project and future operator of the road) to determine conformance with the Environmental Management Strategy (the Strategy). Similarly, the IREA has audited the CPB John Holland Joint Venture (D&C Subcontractor) to determine conformance with the Construction Environmental Management Plan (CEMP), EPRs, and Worksite Environment Management Plans (WEMP).

Prior to starting construction, the IREA reviewed the Strategy and approved the CEMP (and associated subplans). The WEMPs are approved by Project Co. The audits considered in this report are identified under the Project's EPRs (specifically EMP3) required by the Project's Planning Scheme Amendment (PSA) (GC93) and the Project Agreement between the State of Victoria (represented by WGTP MRPV) and Project Co.

The IREA is required to provide a six monthly "audit report" for submission to the Minister for Planning which must be made available to the public (this report).

## 1.2 Project Background

### 1.2.1 West Gate Tunnel Project

On 11 December 2017, the Victorian State Government (the State), as part of a Public Private Partnership (PPP), entered into contracts with Project Co for the construction and operation of the Project.

Project Co is responsible for the design, partial financing, construction, tolling, operation, and maintenance of the Project. Project Co has ultimate responsibility to the State for delivering the Project to the requirements in the contract and for ensuring the D&C Subcontractor fulfils their obligations including the EPRs.

The D&C Subcontractor has been contracted to complete the detailed design and construction of the Project.

The WGTP MRPV is an administrative office established to manage the delivery of the Project in accordance with the contracts on behalf of the State Government. The Project has three components:

1. West Gate Freeway – upgrade and widening works between the M80 Ring Road interchange and Princes Freeway to the southern portals of the tunnels, including connections to Grieve Parade, Millers Road, Williamstown Road, Hyde Street, and the West Gate Bridge.
2. Twin tunnels – two tunnels, one inbound and one outbound, under Yarraville catering for three lanes between the southern and northern portals and connecting to the new bridge over the Maribyrnong River. The outbound tunnel will be approximately 4.0 kilometres long and the inbound tunnel will be approximately 2.8 kilometres long. A tunnel ventilation structure will be located at each exit portal.
3. Port, CityLink, and city connections – connects from the northern tunnel portal to the central city and includes the Maribyrnong River crossing, connections to the Port of Melbourne, elevated roads along Footscray Road, and connections to CityLink and the northwest of the central city. Connections are also provided to both sides of the Port of Melbourne via MacKenzie Road and Appleton Dock Road. A widened Wurundjeri Way is connected to Dynon Road.

Early (preparatory) works started in December 2017 in preparation for construction. This included for instance, low environmental impact works such as completion of environmental surveys and investigations required prior to construction start. The Project started full construction in March 2018 on approval of the CEMP. Details on the construction progress over the audit period are described in Section 2.3.1

A publicly accessible Project Information Centre located on Whitehall Street in Yarraville (known as the Pivot site) is open to the public. This Project Information Centre includes interactive displays, printed information packs and is staffed during the day by members of the D&C Subcontractor Communications Team. There are a number of ways the public can engage with the Project, including:

- Visiting the Project website at <http://westgatetunnelproject.vic.gov.au/>
- Sending the Project a private message on Facebook Messenger
- Contacting the Project call centre on 1800 105 105 or email [info@wgta.vic.gov.au](mailto:info@wgta.vic.gov.au).

## 1.2.2 Planning and Environment Approvals

The Project was declared 'public works' under the *Environment Effects Act 1978* in December 2015, requiring the preparation of an Environment Effects Statement (EES) to inform the Minister for Planning's assessment of the environmental effects of the Project. The EES was publicly exhibited in late May 2017 and public hearings undertaken between mid-August and late September 2017. The Minister for Planning publicly released his Assessment on 27 November 2017 to complete the EES process – concluding that the Project would deliver substantial transport and related benefits.

Three key (primary) approvals have been granted for the Project under Victorian legislation, including:

- Planning Scheme Amendment (PSA) and Incorporated Document issued by the Victorian Minister for Planning requires the project to be constructed and operated according to the Minister's requirements. The Minister approved the project under PSA GC65 on 7 December 2017. This PSA was revoked by Parliament on 7 March 2018 and remade with PSA GC93 on 8 March 2018. The PSA has been incorporated into six separate local Planning Schemes: Brimbank, Hobsons Bay, Maribyrnong, (City of) Melbourne, Port of Melbourne and Wyndham.
- Works Approval issued by the Victorian Environment Protection Authority (EPA) for design and construction of the tunnel ventilation structures.
- Cultural Heritage Management Plan (CHMP) 14562 issued by Aboriginal Victoria for works potentially affecting known and potential areas of Aboriginal Cultural Heritage Significance. CHMP 14562 amended on 4 April 2018 and 28 February 2020.

These approvals include a range of obligations and conditions, including the PSA which requires the Project to be carried out in accordance with the approved "*West Gate Tunnel Project Environmental Performance Requirements, December 2017*". The EPRs define the project-wide environmental outcomes that must be achieved during design, construction and operation of the Project (refer Appendix A for a summary list of these EPRs and the Project website for a full version -

<http://westgatetunnelproject.vic.gov.au/about/keytopics/planning-approvals>).

The Environmental Management EPRs set out the following requirements:

- EPR EMP1 requires the preparation of an Environmental Management Strategy (the Strategy) to provide an overarching framework to address environmental requirements including relevant environmental laws, key approvals, approval conditions and the EPRs.
- EPR EMP2 requires the preparation and implementation of a CEMP, Worksite Environmental Management Plan (WEMP), Operational Environmental Management Plan (OEMP) and other plans as required by the EPRs in accordance with the Strategy.
- EPR EMP3 requires the appointment of an Independent Reviewer and Environmental Auditor (the IREA) to ensure compliance with the Strategy and EPRs and conduct compliance audits of the approved Strategy, CEMP and WEMPs. The WGTP MRPV must forward the audit reports to the Minister for Planning and other approval agencies as appropriate.

The EPRs set standards for the Project and are put in place to mitigate any adverse local effects of the Project on people and the environment. The EPRs have been incorporated into the Project Agreement between the State and Project Co and are included in the subcontract between Project Co and the D&C Subcontractor.

On 1 July 2021, the new *Environment Protection Act 2017* came into force. The “Compliance Code for Victoria’s Big Build Projects” (EPA Publication 1998, June 2021) applies to the Project and provides practical guidance on how to comply with specific duties and obligations under the *Environment Protection Act 2017* and *Environment Protection Regulations 2021*.

The relationship between the various Project parties and key planning and environment documents, including the Strategy, are summarised in Figure 1 below. This diagram shows the role of the Minister for Planning and other regulatory authorities in issuing approvals for the Project while continuing their role as regulator (blue boxes). These requirements, which include regulatory approvals and EPRs, are then incorporated into a series of Project Agreements (contracts) between WGTP MRPV (representing the State of Victoria), Project Co, and the D&C Subcontractor. Project Co delegate the direct responsibility for delivering these environmental requirements to the D&C Subcontractor via the Strategy.

The Strategy lists the Project environmental requirements and minimum requirements for both Project Co and the D&C Subcontractor. In the case of the D&C Subcontractor, this includes the requirements to develop environmental documentation such as a CEMP which outlines how environmental requirements will be met during design and construction, and WEMPs, which are used on the construction site as a practical guide to manage environmental issues. The D&C Subcontractor is also required to maintain an Environmental Management System that complies with the international standard ISO14001 Environmental Management Systems. This requires the D&C Subcontractor to develop and maintain various management systems, procedures and processes that facilitate continual improvements in environmental management.

The responsibility of WGTP MRPV, Project Co and the D&C Subcontractor for delivery of the environmental management framework is summarised in Figure 2. The figure also shows how environmental requirements are incorporated into design and construction documentation. Project Co is responsible for the preparation and implementation of the Strategy in accordance with EPR EMP1. The obligation for the preparation and implementation of the CEMP (including subplans), WEMP and any other project plans required to achieve the EPRs is the responsibility of the D&C Subcontractor. Design and construction documentation is prepared by the D&C Subcontractor in accordance with relevant environmental requirements and EPRs.

Construction on the Project commenced in March 2018 following the approval of the Strategy by the Minister for Planning and the CEMP (and subplans) by the IREA and WGTP MRPV. Further information on the Strategy, CEMP, WEMP, and the audit and review processes is provided in the following sections.

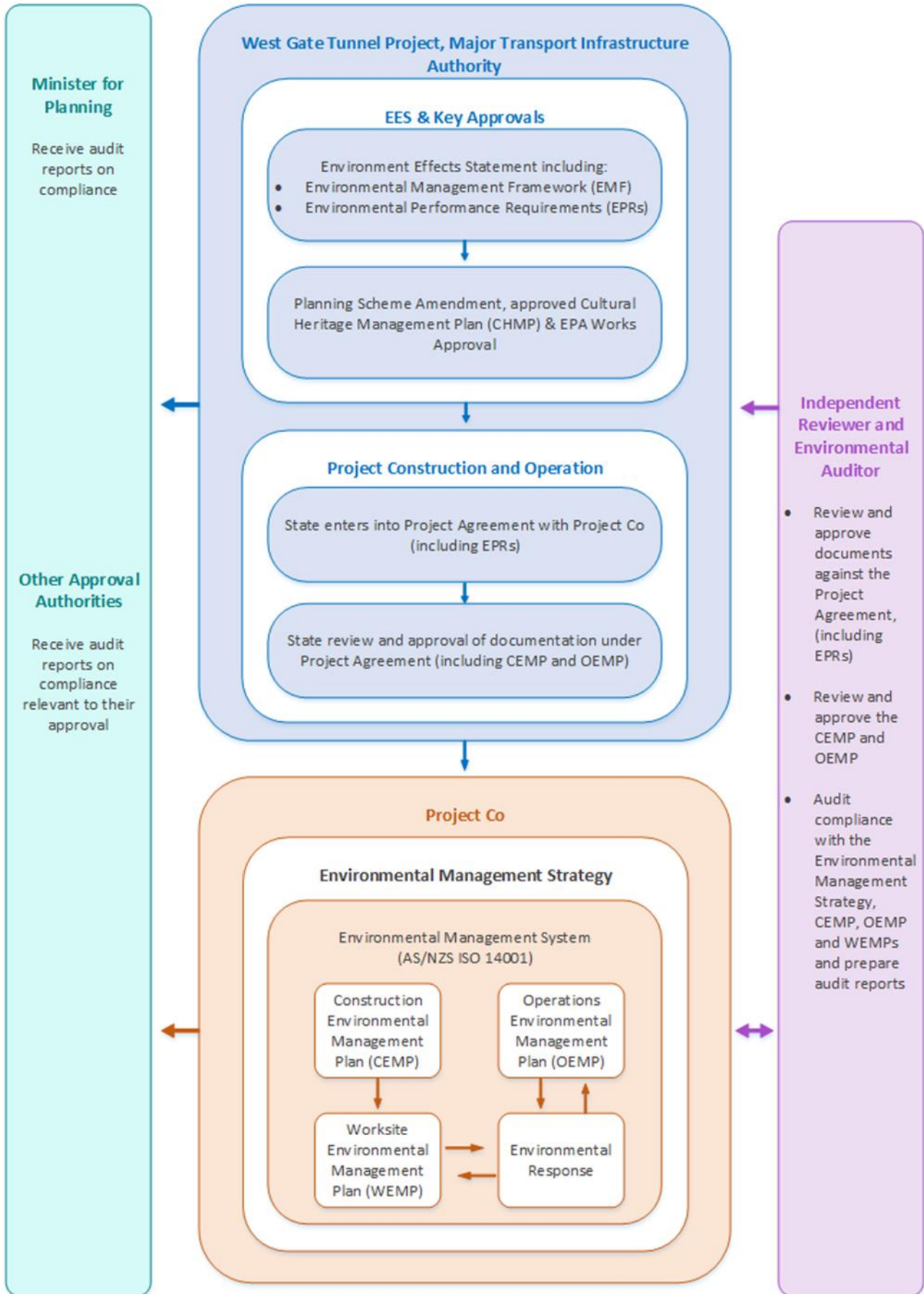


Figure 1 – Governance Framework for the Project Environmental Management Strategy (adapted from Strategy 2018)

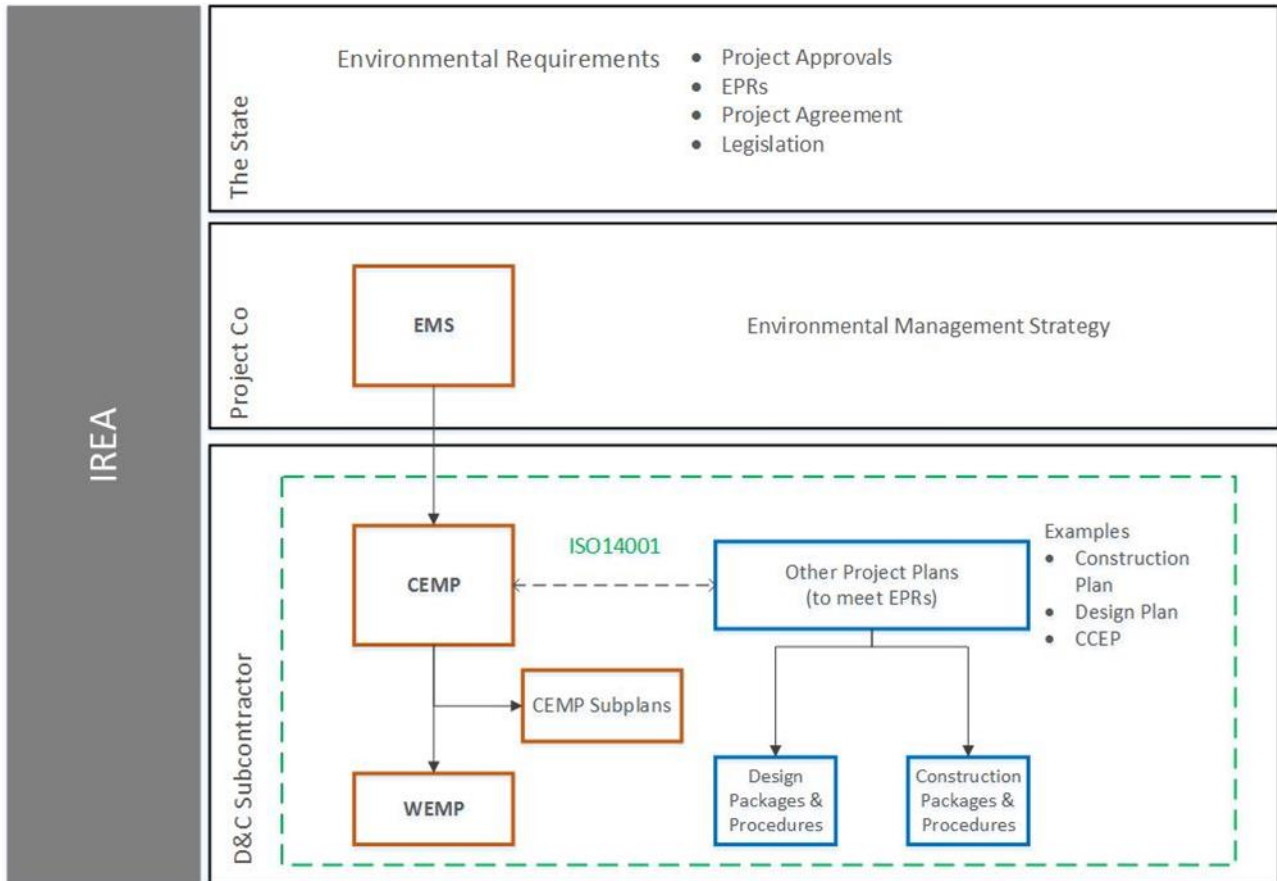


Figure 2 – Relationship between environmental management framework and Project design and construction documentation.

### 1.2.3 Environmental Management Strategy

The Strategy provides an overarching framework to address all environmental requirements and manage environmental outcomes for the Project. Project Co is responsible for ensuring compliance with the Strategy which sets out the framework for delivering and complying with the EPRs, CEMP and other environmental requirements.

The Strategy was developed in early 2018, finalised on 31 January 2018, and approved by the Minister for Planning on 20 February 2018 (under PSA GC65). It was prepared in consultation with councils and other key stakeholders and reviewed by the IREA. PSA GC65 was revoked by the Parliament of Victoria on 7 March 2018, a new PSA (PSA GC93) was approved by the Minister for Planning, including re-approval of the Strategy by the Minister for Planning on 8 March 2018 in exactly the same form.

The Strategy outlines the Project’s overall Environmental Management System, including responsibilities shared by the WGTP MRPV, Project Co, and the D&C Subcontractor. The Strategy is consistent with the Australian Standard for Environmental Management Systems (AS/NZ ISO 14001), which includes, but is not limited to project legal requirements, environmental management documents, roles and responsibilities, communication requirements, reporting, auditing, and processes for evaluating compliance. It is designed to provide an overarching framework to address the EPRs, which are largely delegated to the D&C Subcontractor to deliver (via the CEMP and Design Management Plans).

### 1.2.4 Construction Environmental Management Plan

The D&C Subcontractor’s CEMP and subplans were developed in March 2018 and approved by the IREA and WGTP MRPV for implementation. The CEMP outlines how the D&C Subcontractor will achieve the environmental requirements for the construction phase of the Project. This includes requirements outlined under the legislation (including permits and approvals), the Project EPRs, and requirements set out under

the Project Agreement. The CEMP includes control measures for implementation during construction in order to manage, minimise or avoid environmental impacts in carrying out construction activities. The following subplans have also been developed to manage environmental risk associated with D&C Subcontractor activities and to address the requirements of EPRs:

Table 1 – Status of CEMP and subplans<sup>1</sup>

Plan	Update status
Construction Environmental Management Plan Rev 23 – 20 February 2024	Rev 24 – reviewed
Water Management Plan Rev 16 – 8 November 2023	Rev 18 – reviewed
Flora and Fauna Management Plan Rev 22 – 11 April 2024	Rev 23 – reviewed
Construction Noise and Vibration Management Plan Rev 16 – 19 December 2023	Rev 17 – reviewed
Groundwater Management Plan Rev 19 – 26 November 2023	Rev 20 – reviewed
Heritage Management Plan Rev 13 – 11 October 2023	Rev 15 – reviewed
Waste Management Plan Rev 17 – 20 October 2023	Rev 19 – reviewed
Energy Management Plan Rev 19 – 27 February 2024	Rev 20 – reviewed
Hazardous Substances Management Plan Rev 16 – 15 March 2024	Rev 17 – reviewed
Lighting Management Plan Rev 18 – 16 January 2024	Rev 19 – reviewed
Soil and Spoil Management Plan Rev 18 – 15 February 2024	Rev 19 – reviewed
Air Quality Management Plan Rev 18 – 4 December 2023	Rev 19 – reviewed
Ground Movement Management Plan Rev 9 - 8 July 2020	Rev 14 – reviewed
Tree Management Plan Rev 2* - 11 April 2024	Rev 3 – reviewed

\* Tree Management Plan was previously an appendix of the Flora and Fauna Management Plan (Revision 8)

These sub plans do not address the entire scope of all EPRs for the Project. The CEMP makes reference to a suite of other management plans which are required to demonstrate how these and other EPRs will be complied with e.g. Interface Management Plan, Business Involvement Plan, Design Management Plan, Construction Management Plan, Communications and Community Engagement Plan (CCEP), Construction Communications and Community Engagement Plan (CCCEP). The CEMP (and auditing process) is the main framework document used to audit conformance with the Project EPRs (noting it delegates these requirements to other parts of the D&C Subcontractor Management Systems).

## 1.2.5 Worksite Environmental Management Plans

The D&C Subcontractor’s WEMPs are prepared in order to manage discrete construction stages or work packages (by type) that may have an adverse impact on the environment. The WEMPs are subsidiary to the CEMP and are implemented at specific worksites to minimise potential impacts of construction activities on the environment and community. Each WEMP will include a map showing the location and scope of works to be managed and include environmental management measures (controls) required to be implemented. The WEMPs are for use by site personnel, consultants, and subcontractors, and a copy of the relevant WEMP is

<sup>1</sup> Subplan revisions listed in left column are the latest approved revisions by the IREA and the State.



to be displayed at each site compound. Some EPRs require engagement with regulators (including Councils) where it is considered appropriate e.g. when Council land is affected.

### **1.3 Role of the IREA**

The IREA was jointly appointed by WGTP MRPV and Project Co on 30 May 2017 to provide independent oversight of design engineering, construction, and environmental performance of the Project. The IREA undertakes audits and surveillance of Project activities to assess whether compliance with the Project Documents is being achieved. This includes EPR EMP3 which requires the IREA to complete environmental audits of conformance with the approved Strategy (six-monthly), CEMP (quarterly) and WEMPs (monthly).

The IREA started work on the Project in late 2017, through review of design and construction packages associated with “early works” (limited to low impact investigations and site set up), site surveillance of early works, and reviews of draft environmental management documentation.

Following Financial Close and the issuing of key approvals, the IREA and WGTP MRPV approved the CEMP (including subplans) prior to construction starting in March 2018. The IREA and WGTP MRPV are also responsible for reviewing subsequent revisions of the CEMP and subplans.

With construction well underway, the IREA is responsible for undertaking a number of activities, described in the following sections.

#### **1.3.1 Regular Site Inspections / Surveillance**

The IREA undertakes regular inspections of the construction site (at least daily). IREA representatives are based on site in each of the three construction zones – tunnels, east, and west. The surveillance process is not the same as a formal audit as it may only address (in one inspection) part of an EPR. This information is made available to the D&C Subcontractor and summarised in monthly reports by the IREA. This surveillance assists the IREA in identifying key issues and risks which is used to inform future surveillance and auditing effort. These inspections are designated by “CS” in Appendix A, which summarises the activities that the IREA has undertaken over the last six months in relation to checking compliance with the EPRs. This shows that while not every EPR is formally “audited” by the IREA every day, it is subject to regular surveillance.

#### **1.3.2 Design and Construction Documentation Review**

The IREA reviews all design and construction packages (designated “DR” and “CR” in Appendix A). This includes, but is not limited to, reviews of documents such as design drawings, technical information packages, design packages (outlining the basis of design), construction packages, and construction procedures. These documents are reviewed by one or more representatives of the IREA considered a specialist in their field e.g. hydrogeologist, bridge engineer, ecologist. The IREA reviews these documents against all Project environmental requirements. These reviews are sent to all Project parties for consideration and action (by the D&C Subcontractor). The IREA is required to certify design packages which means that these are not signed off until the environmental requirements are addressed. Construction packages are reviewed by the IREA and checked for compliance on site during site surveillance (refer Section 1.3.1). The outcomes of these reviews do not represent a formal audit but can provide (in part or in full) inputs into the quarterly CEMP audit which is the formal mechanism for auditing and reporting on EPR conformance.

#### **1.3.3 Management Plan Review**

The IREA is responsible for reviewing and/or approving management plans and documentation (designated “MP” in Appendix A). In approving the CEMP and subplans required prior to construction start (in March 2018), the IREA has checked compliance with the EPR linked to these CEMP subplans. Though not a formal audit, these reviews are documented in the EPR compliance table in Appendix A as they go some way to demonstrating conformance. The IREA has also reviewed a number of other plans that do not necessarily need to be included in the CEMP but remain a requirement of the EPR, such as the CCEP. The review process for these plans is similar to the process used for design and construction packages, whereby the IREA’s comments are documented, and the D&C Subcontractor is obliged to address these in subsequent revisions of the plan before it is issued for use.

Revised versions of the CEMP and subplans were reissued to all project parties in this audit period and the previous auditing period for review and approval. The CEMP and subplans have been approved by the project parties (refer Table 1).

EPR EMP3 requires formal auditing of the Strategy, the CEMP, and WEMPs (refer Section 2 for further detail on the conduct and scope of auditing). Audits of the CEMP and EPRs are undertaken every quarter (identified under the “Audit” columns in Appendix A). The IREA’s indicative 12-month EPR audit schedule is included in Appendix A. Through this program all applicable EPRs are audited at least once over a twelve-month period via the quarterly CEMP audits.

### **1.3.4 Minister’s Report**

The IREA in its role as independent auditor is responsible for preparing a summary audit report which, WGTP MRPV must forward to the Minister for Planning during construction and other approval authorities as appropriate. This audit report draws from audits undertaken over a six-month period, in this case the (thirteenth) six months of construction between March 2024 – August 2024. The formal audits described in this Minister’s Report have been undertaken by the IREA Lead Environment Auditor, Hilary Chapman and Assistant Environment Auditors, Jamie Crawford, Milo Logreira, and Jin-Sol Lee. The Lead Auditor was supported by a team of specialists listed in Appendix B.

## **1.4 Report Structure**

This report is divided into the following sections:

- Section 2: Conduct of Audits – details the scope of the IREA’s audit activities undertaken prior to, during and after the audit.
- Section 3: Audit findings – provides the IREA’s findings from audits of the Strategy, CEMP and WEMPs.
- Section 4: Audit Conclusion –on the D&C Subcontractor’s conformance with the requirements of the Strategy, CEMP and WEMPs.
- Appendices
  - Appendix A – EPR Auditing Status
  - Appendix B – IREA Specialist Team
  - Appendix C – Limitations.

## 2 CONDUCT OF AUDITS

### 2.1 Audit Objectives

The objective of the audits summarised in this report is to assess conformance with the current Strategy, the CEMP, and the WEMPs based on the requirement of EPR EMP3. This includes conformance with the primary approvals (refer Section 1.2.2 above). The objective of these audits is to sample compliance with requirements over the period of March 2024 to August 2024 (inclusive).

### 2.2 IREA Auditing Process

Figure 3 below details the key steps of the IREA environmental auditing process.

The IREA undertook COVIDSafe work practices and protocols in line with prevailing Victorian Government health advice.

### 2.3 Audit Scope

The IREA determines the scope of these audits, which changes based on which Project issues, activities and environmental risks are considered to be significant at the time of audit. Considerations may include:

- Implementation of the CEMP and associated management system and tools.
- Analyses of environmental monitoring results, focusing on groundwater, noise, vibration, surface water, and air quality.
- Environmental risks relating to current construction activities.
- Concerns of the community.
- Compliance status of EPRs.

The IREA reviews a sample of environmental requirements (and evidence of compliance) over the auditing period. It is not feasible or necessary to fully audit all requirements in a six-month period (there are thousands of requirements e.g. legislation, EPRs, contract, CEMP, subplans). For example, the IREA excludes requirements, such as operational EPRs, which are not part of the current scope of work.

It should be noted that while all environmental requirements are not formally audited over a six-month period, the IREA is required to “check” compliance with environmental requirements through activities such as formal review of documentation and inspection of the construction site (refer Section 1.3). This means that a much larger set of requirements relevant to the Project period will be checked by the IREA for compliance during this period.

In this six-month reporting period, 44 of the 117 EPRs were audited by the IREA. 39 EPRs were audited during the previous reporting period (September 2023 – February 2024), bringing the total EPRs audited for this 12-month period to 83 (refer Appendix A). The remaining EPRs not audited include:

- Five operational EPRs that are not relevant to construction.
- Four EPRs that have been met and deemed closed.
- Three EPRs relating to blasting and ground-borne activities, which are currently outside of the Project’s scope.
- Twenty-two EPRs relating to complete design components, which are being monitored by the IREA through other established processes, rather than explicit auditing.
- During this audit cycle, no EPRs that will be monitored through other established processes, rather than explicit auditing were added.
- EPRs which will be addressed during the rest of the annual audit cycle. The IREA audits all relevant EPRs within its annual audit program on a risk basis. This means that there may be more than one year between audits for some EPRs, and less than one year interval for other EPRs.

The environmental requirements audited and checked by the IREA during this 12-month period are summarised below and shown in Appendix A.

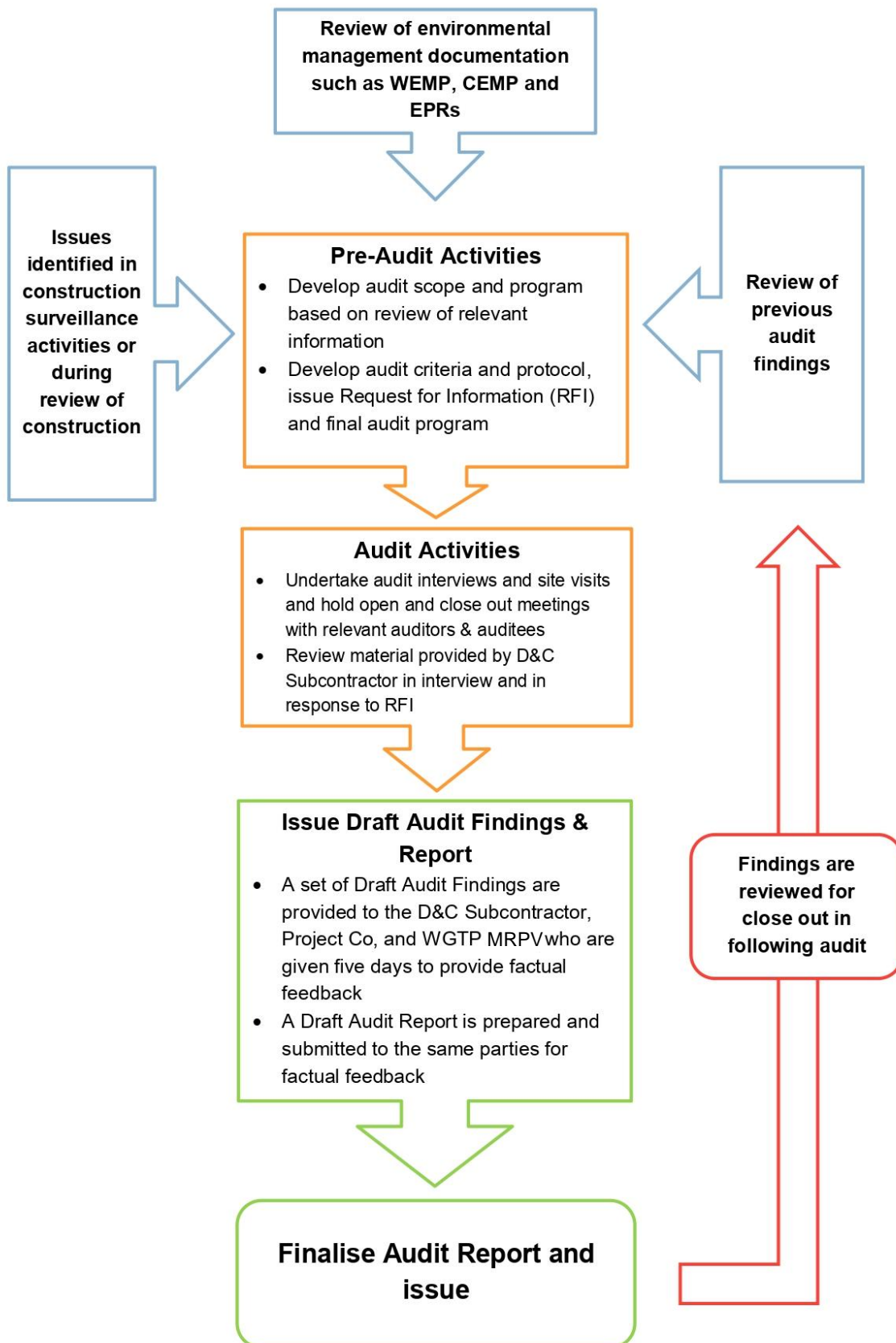


Figure 3 – Overview of environmental audit process

A summary of the scope of the audits conducted by the IREA is provided in Table 2 below.

Table 2 – Summary of Audits Conducted During Reporting Period – March 2024 to August 2024.

Audit Type	Date	Scope
Strategy Audit	August 2024	<ul style="list-style-type: none"> <li>Strategy (revision 7) dated 31 January 2018 and the legislation, approvals, consents, guidelines, and standards relevant to its implementation.</li> </ul>
CEMP Audit	May 2024 & August 2024	<ul style="list-style-type: none"> <li>Elements 3, 8, 11, and 12 of the CEMP. Revision 23 (dated 20 February 2024) was audited in the May and August 2024 audit.</li> <li>Relevant documentation including relevant D&amp;C Subcontractor management plans and subplans such as the Air Quality Management Plan, Construction Communications and Community Engagement Plan, Construction Noise and Vibration Management Plan, Flora and Fauna Management Plan, Ground Movement Management Plan, Groundwater Management Plan, Hazardous Substances Management Plan, and the Water Management Plan were also audited. A full overview of CEMP documentation audited during this reporting period is provided in Section 3.3.</li> <li>A selection of EPRs relevant to the current stage of design and construction (as defined in Appendix A). Overview of EPR documentation audited during this reporting period is provided in Section 3.2.</li> </ul>
WEMP Audit	March 2024 East Zone	<ul style="list-style-type: none"> <li>Audit of Ramp D1/D2 (Bridge 74) over Moonee Ponds Creek.</li> </ul>
	April 2024 Tunnels Zone	<ul style="list-style-type: none"> <li>Audit of Inbound Southern Tunnel Portals (including cut and cover).</li> </ul>
	May 2024 East Zone	<ul style="list-style-type: none"> <li>Audit of East Zone – Bridge 75 Veloway WD to Footscray.</li> </ul>
	June 2024 Tunnels Zone	<ul style="list-style-type: none"> <li>Audit of Northern Portal – Piling Works.</li> </ul>
	July 2024 East Zone	<ul style="list-style-type: none"> <li>Audit of East Zone – Bridge 90.</li> </ul>
	August 2024 West Zone	<ul style="list-style-type: none"> <li>Audit of Offset Tree Package.</li> </ul>

The IREA’s view on conformance was informed by interviews with staff from the D&C Subcontractor, and review of relevant systems, tools and documentation developed and implemented. The IREA has reported on findings raised between 1 March 2024 and 31 August 2024, and on findings closed between 1 April 2024 and 30 September 2024. Findings closed between 1 and 31 March 2024 have been included in the previous reporting period (September 2023 – February 2024).

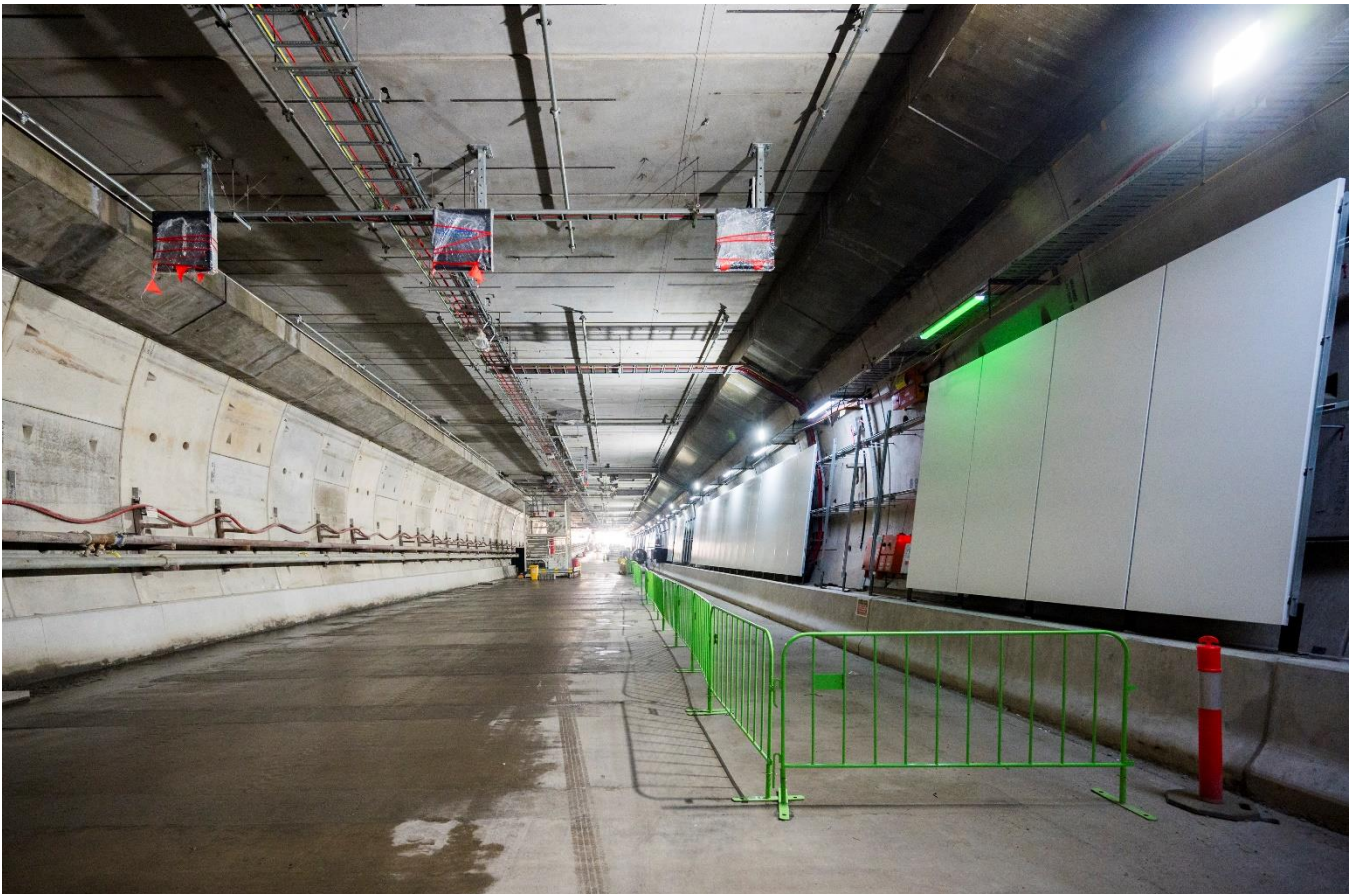
### 2.3.1 Design and Construction Activities – March 2024 to August 2024

Construction activities continue across the Project. Recent key activities include:

- **West** – Major works include maintenance works on ramps and landscaping in Subzones 201 and 202A near Princes Freeway, with Subzone 202B works along Westgate Freeway comprising of painting works on bridges, gantry installations, asphaltting, and ITS (intelligent transport systems) works. Lastly, in Subzone 203 near Williamstown interchange works include painting works, completion of ramps, and landscaping.
- **Tunnel, Buildings, and Mechanical, Electrical & Interfaces** – Major works include completion of ramp wall and roof slab at Outbound Southern Portal (OSP) Melbourne Fire Brigade (MFB), concrete pours on tunnel road decks, installation of road decks at the Northern Portal (NP), and civil works at Northern Portal Yard. Substation works comprise of high voltage (HV) equipment being placed in location and equipment plinths in low voltage (LV) switchroom at Northern Portal Substation and rectification work on equipment plinths at Southern Portal Substation. At M80 Secondary Incident Response building fit-out works are ongoing and at Freeway Control Centre (FCC) works are substantially completed.

Regarding mechanical, electrical, and interfaces (ME&I) works internal fit-out of North Portal Substation and mechanical and electrical fit-out of South Portal Substation is underway. Construction of the South Portal Vent Structure is also ongoing. Elsewhere, internal building works are completed at M80 Secondary Incident Response Building and defect works are ongoing at Freeway Control Centre (FCC) and Alternate Traffic Control Response (ATCR) Building. Lastly, the Eel Net Timber Structure has been delivered onsite, with coating application underway prior to installation at South Portal Inbound (SPI), and Diagrid Steel Framing at South Portal Outbound is being assembled on ground.

- **East** – Major works include bridge works along Maribyrnong River comprising of coating repairs for steel girders, marine coating preparation, parapet, barrier rail, and gantry installation, and installation of cladding attachments and cladding. Further east along Footscray Road to Citylink connections and Wurundjeri Way key construction activities cover multiple bridges with works including barrier installation, guard rail installation, gantry installation, expansion joint installation, light pole installation, asphaltting, and deck formwork, reo, and pour (FRP) works. Additionally, Wurundjeri Way civil works are ongoing as well as pavement works and asphaltting along Footscray Road and Shared User Path reinstatement around Moonee Ponds Creek.



*Photo 1 – Tunnel Zone (Source: WGTP MRPV, 3 July 2024)*

## 2.4 Audit Findings Classification

Audit findings are classified in each audit according to the following definitions which are aligned with classifications provided by AS/NZS ISO14001: 2015, the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), and audit classifications utilised on previous high-profile Victorian infrastructure projects. The definitions of conformance, non-conformance, opportunity for improvement, observation, and not applicable are provided below.

### Conformance

There is suitable evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the auditable element. Findings are reported by exception only, and as such conformances are not detailed within this report.

### Non-conformance

An instance, event or occurrence that has not fulfilled a requirement that has been specified in the Strategy, CEMP, WEMP, EPRs, legislation, and approval conditions. A situation, which would, on the basis of available objective evidence raise significant doubt as to the effectiveness of environmental management.

### Opportunity for Improvement

A deficiency in the implementation of the Strategy, CEMP, WEMPs, or associated 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. Observations are also made to note a positive improvement on the Project.

### 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. Findings are reported by exception only, and as such 'Not Applicable' findings are not detailed within this report.

It should be noted that the audit only reports on non-conformances, areas for improvement and observations against the CEMP findings. All other areas within the scope of the audit should be assumed to be compliant. Where EPRs have been audited, compliance findings are also included.

The IREA does not require observations to be formally closed out after they have been issued and therefore will not report these in subsequent audit reports. It is the responsibility of the D&C Subcontractor and Project Co to address these findings.

### Significance of Findings

The nature of findings may vary. In reviewing the results of audit findings, it is necessary to understand the context in which they have been issued. For instance, some findings may be administrative in nature compared with those that pose an immediate and/or significant risk to the environment. An example of an administrative finding might include the requirement for the D&C Subcontractor to use a particular system to record incidents, where this is defined in the CEMP. However, if the D&C Subcontractor 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. The D&C Subcontractor in this case may not be conforming with the original CEMP (which is captured as a non-conformance in an audit), but it does not necessarily mean that incidents are not being reported. This requirement is likely to be modified in the next version of the CEMP. Administrative findings therefore do not always pose a significant risk to the environment.

## West Gate Tunnel Project

Alternatively, if the D&C Subcontractor was found to have caused an incident resulting in a discharge to the river, this would be viewed as an environmental non-conformance of greater significance.

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



*Photo 2 – Wurundjeri Way – East Zone (Source: WGTP MRPV, 3 July 2024)*



### 3 SIX-MONTHLY AUDIT FINDINGS

The key findings arising from the IREA's most recent six months of auditing are included in the sub-sections below.

- Section 3.1 summarises audit findings of the Strategy.
- Section 3.2 outlines findings of formal auditing and checking of EPRs.
- Section 3.3 describes audit findings against the CEMP and subplans.
- Section 3.4 provides findings of the WEMP audits.

#### 3.1 Environmental Management Strategy

Audits of the Strategy are conducted six-monthly, with one conducted during this reporting period. Overall, Project Co was found to be meeting their obligations under the Strategy.

No adverse findings were raised against Project Co during the Strategy audit.

##### Previous reporting periods

No findings remain open from previous reporting periods.

#### 3.2 Environmental Performance Requirements

All EPRs formally audited during this reporting period were considered compliant. No non-conformances, opportunities for improvement, or observations were raised during this reporting period. The following sub-sections focuses on non-conformances and opportunities for improvement raised in this reporting period and previous reporting periods.

Project Co / the D&C Subcontractor is responsible for delivering the majority of EPRs listed below unless otherwise specified as being delivered by the State.

##### 3.2.1 Environmental Management

Two environmental management EPRs were audited during this reporting period, namely EMP2 and EMP4. All were deemed compliant.

##### Previous reporting periods

Two opportunities for improvement against EMP4 remain open from previous auditing periods.

Refer also to related CEMP findings in Section 3.3.

##### 3.2.2 Air Quality

Three air quality EPRs were audited during this reporting period, namely AQP1, AQP4, and AQP6. All were deemed compliant.

The IREA also notes that two AQP EPRs were not audited in the audit period as they relate to the operational phase, which does not currently relate to the scope of the Project. These inactive EPRs are AQP5 and AQP7.

##### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to related Air Quality Management Plan findings in Section 3.3.1.

### 3.2.3 Business

No business EPRs were audited during this reporting period.

#### Previous reporting periods

One opportunity for improvement remains open against BP5 from previous reporting periods.

Refer also to related Business Involvement Plan findings in Section 3.3.14.

### 3.2.4 Cultural Heritage

Two cultural heritage EPRs were audited during this reporting period, namely CHP1, and CHP9. All were deemed compliant.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to related Heritage Management Plan findings in Section 3.3.8.

### 3.2.5 Contaminated Soil and Spoil Management

No contaminated soil and spoil management EPRs were audited during this reporting period.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to related Soil and Spoil Management Plan findings in Section 3.3.10.

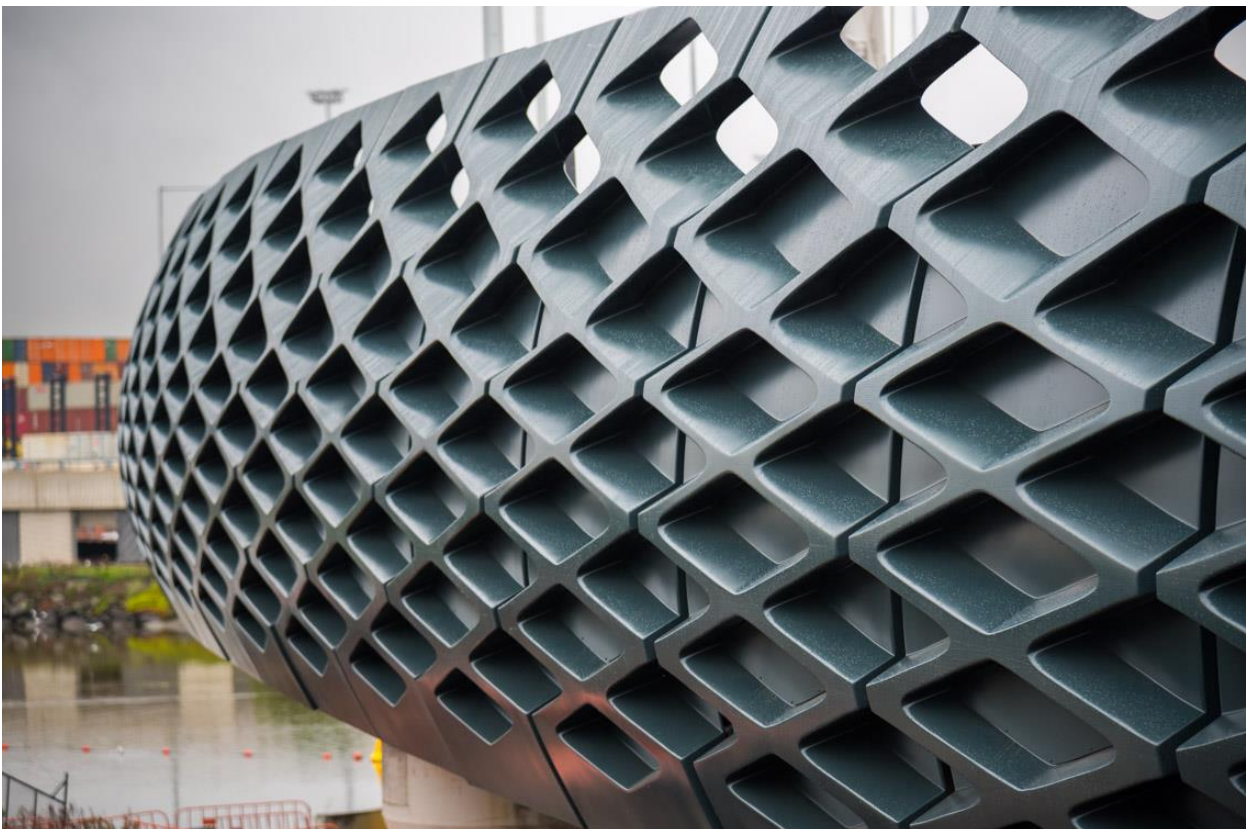


Photo 3 – Maribyrnong River - East Zone (Source: WGTP MRPV, 27 July 2024)

### **3.2.6 Ecology**

Four ecology EPRs were audited during this reporting period, namely EP1, EP2, EP4, and EP5. All were deemed compliant.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to related Flora and Fauna Management Plan findings in Section 3.3.4.

### **3.2.7 Greenhouse Gas Emissions**

Two greenhouse gas emissions EPRs were audited during this reporting period, namely GGP1 and GGP2. All were deemed compliant.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to related Energy Management Plan findings in Section 3.3.3.

### **3.2.8 Ground Movement**

Four ground movement EPRs were audited during this reporting period, namely GMP2, GMP3, GMP4, and GMP6. All were deemed compliant.

#### **Previous reporting periods**

One opportunity for improvement against GMP5 remains open from previous reporting periods.

Refer also to related Ground Movement Management Plan findings in Section 3.3.5.

### **3.2.9 Groundwater**

Six groundwater EPRs were audited during this reporting period, namely GWP1, GWP2, GWP4, GWP5, GWP6, and GWP7. All were deemed compliant.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to related Groundwater Management Plan findings in Section 3.3.6.

### **3.2.10 Land Use**

No land use EPRs were audited during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to related Landscape Management Plan findings in Section 3.3.13.

### **3.2.11 Landscape and Visual**

No landscape and visual EPRs were audited during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to related Landscape Management Plan findings in Section 3.3.13.

### 3.2.12 Noise and Vibration

Ten noise and vibration EPRs were audited during this reporting period, namely NVP1, NVP2, NVP5, NVP7, NVP8, NVP10, NVP11, NVP12, NVP13, and NVP18. All were deemed compliant.

The IREA also notes that a number of NVP EPRs were not audited in the audit period as they relate to blasting, tunnelling and/or operational phase, which were not relevant to the scope of the Project at the time of auditing. These inactive EPRs are NVP3, NVP6, NVP9, NVP15, NVP16 and NVP17.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to Construction Noise and Vibration Management Plan findings in Section 3.3.2.



Photo 4 – Footscray Road – East Zone (Source: WGTP MRPV, 4 March 2024)

### 3.2.13 Social

Two social EPRs were audited during this reporting period, namely SP1 and SP2. All were deemed compliant.

#### Previous reporting periods

Two opportunities for improvement remain open against SP2 from previous reporting periods.

### 3.2.14 Surface Water

Five surface water EPRs were audited during this reporting period, namely SWP6, SWP7, SWP9, SWP10, and SWP11. All were deemed compliant.

#### Previous reporting period

No findings remain open from previous reporting periods.

Refer also to Water Management Plan findings in Section 3.3.12.

### 3.2.15 Transport

Four transport EPRs were audited this reporting period, namely TP2, TP3, TP5, and TP7. All were deemed compliant.

#### Previous reporting periods

No findings remain open from previous reporting periods.

### 3.2.16 Waste Management

No waste management EPRs were audited during this reporting period.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to Waste Management Plan findings in Section 3.3.11.

## 3.3 Construction Environmental Management Plan

### Overview

CEMP audits are conducted on a quarterly basis, with two CEMP audits conducted during the reporting period.

During the May 2024 audit the following management plans and sections were audited:

- CEMP (Element 3, Element 12)
- Air Quality Management Plan (Section 4, Section 5)
- Construction Soil and Spoil Management Plan (Section 4, Section 5)
- Construction Communication and Community Engagement Plan
- Hazardous Substances Management Plan (Section 4, Section 5)
- Water Management Plan (Section 4, Section 5)

During the August 2024 audit the following management plans and sections were audited:

- CEMP (Element 8, Element 11)
- Construction Noise and Vibration Management Plan (Section 4, Section 5, Section 6, Section 7, Section 8)
- Flora and Fauna Management Plan (Section 4, Section 5)
- Ground Movement Management Plan (Section 3, Section 4, Section 5)
- Groundwater Management Plan (Section 5, Section 6, Section 7)

### Current Reporting Period

No non-conformances or opportunities for improvement were raised during this reporting period.

### Previous Reporting Periods

One opportunity for improvement remains open against the CEMP from previous reporting periods.

### 3.3.1 Air Quality Management Plan

No adverse findings were raised against the Air Quality Management Plan (AQMP) during this reporting period.

### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.2 for findings relating to air quality EPRs.

## **3.3.2 Construction Noise and Vibration Management Plan**

No adverse findings were raised against the Construction Noise and Vibration Management Plan (CNVMP) during this reporting period.

### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.12 for findings relating to noise and vibration EPRs.

## **3.3.3 Energy Management Plan**

The Energy Management Plan (EMP) was not specifically audited during this reporting period.

### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.7 for findings relating to greenhouse gas emissions EPRs.

## **3.3.4 Flora and Fauna Management Plan**

No adverse findings were raised against the Flora and Fauna Management Plan (FFMP) during this reporting period.

### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.6 for findings relating to ecology EPRs.

## **3.3.5 Ground Movement Management Plan**

No adverse findings were raised against the Ground Movement Management Plan (GMMP) during this reporting period.

### **Previous reporting periods**

One opportunity for improvement remains open against the Ground Movement Management Plan (GMMP) relating to the management and storage of information.

Refer to Section 3.2.8 for findings relating to ground movement EPRs.

## **3.3.6 Groundwater Management Plan**

No non-conformances or opportunities for improvement were raised against the Groundwater Management Plan (GWMP) during this reporting period.

### **Previous reporting periods**

No findings remains open from previous reporting periods.

Refer to Section 3.2.9 for findings relating to groundwater EPRs.

### **3.3.7 Hazardous Substances Management Plan**

No adverse findings were raised against the Hazardous Substances Management Plan (HSMP) during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.14 for findings relating to hazardous substances EPRs.

### **3.3.8 Heritage Management Plan**

The Heritage Management Plan (HMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer to Section 3.2.4 for findings relating to cultural heritage EPRs.

### **3.3.9 Lighting Management Plan**

The Lighting Management Plan (LMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

### **3.3.10 Soil and Spoil Management Plan**

The Soil and Spoil Management Plan (SSMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

Refer also to Section 3.2.5 for findings relating to soil and spoil EPRs.

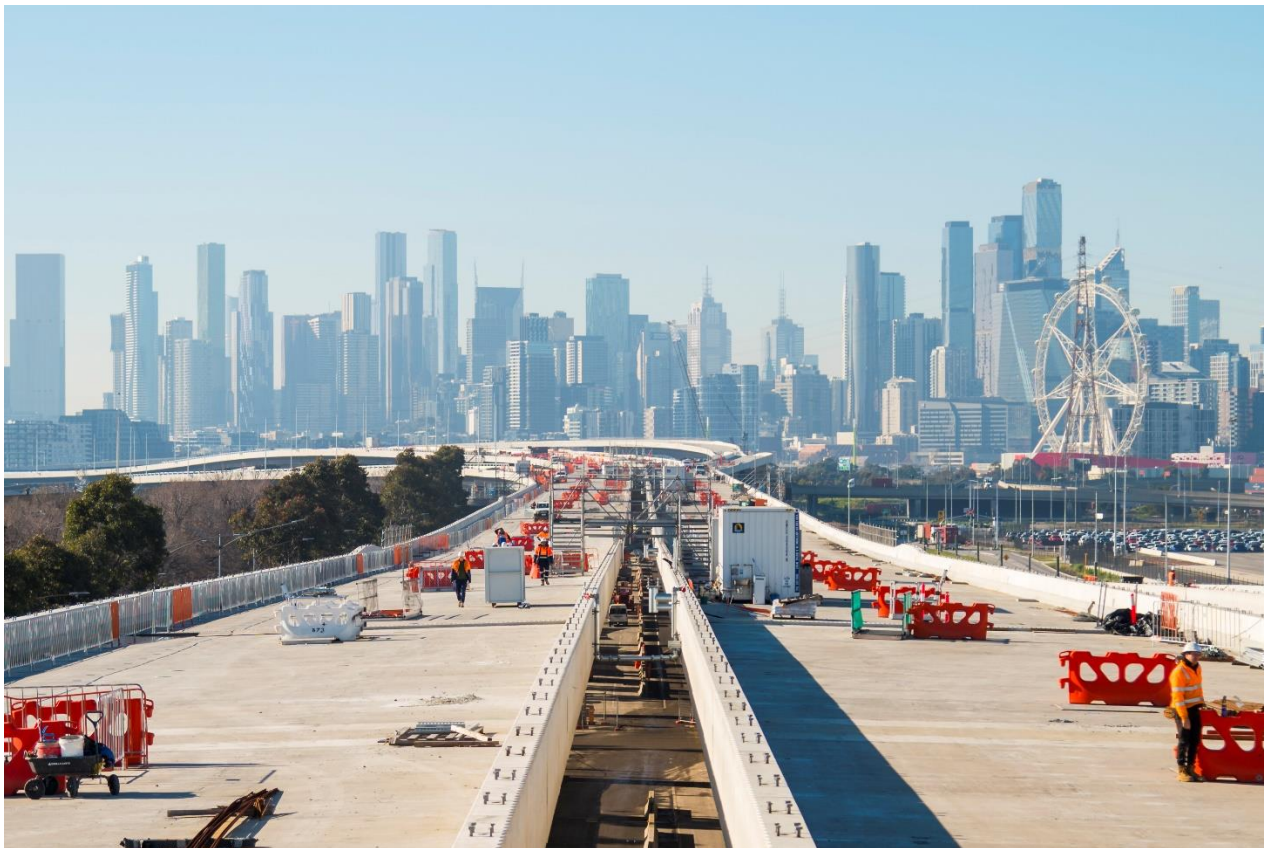


Photo 5 – Footscray Road – East Zone (Source: WGTP MRPV, 3 July 2024)

### 3.3.11 Waste Management Plan

The Waste Management Plan (WstMP) was not specifically audited during this reporting period.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer also to Section 3.2.16 for findings relating to waste EPR.

### 3.3.12 Water Management Plan

One opportunity for improvement was raised against the Water Management Plan (WMP) during this reporting period.

#### Previous reporting periods

No findings remain open from previous reporting periods.

Refer to Section 3.2.14 for findings relating to surface water EPRs.

### 3.3.13 Landscape Management Plan

The Landscape Management Plan (LdMP) was not specifically audited during this reporting period.

The LdMP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the LdMP, which are required to demonstrate how these and other EPRs will be complied with.

#### Previous reporting periods

No findings remain open from previous reporting periods.



### **3.3.14 Business Involvement Plan**

The Business Involvement Plan (BIP) was not specifically audited during this reporting period.

The BIP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the BIP, which are required to demonstrate how these and other EPRs will be complied with.

#### **Previous reporting periods**

No findings remained open against the BIP from previous reporting periods.

Refer to Section 3.2.3 for findings relating to business EPRs.

### **3.3.15 Construction Communications and Community Engagement Plan**

No adverse findings were raised against the Construction Communications and Community Engagement Plan (CCCEP) during this reporting period.

The CCCEP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the CCCEP, which are required to demonstrate how these and other EPRs will be complied with.

#### **Previous reporting periods**

No findings remain open from previous reporting periods.

## **3.4 Worksite Environmental Management Plan**

WEMP audits are conducted monthly, with six WEMP audits conducted during this reporting period. A total of twelve findings were raised in this reporting period and eleven in the previous reporting period. Findings raised during this reporting period comprised:

- No non-conformances.
- Three opportunities for improvement.
- Nine observations.

Of all WEMP findings:

- 25% related to inadequate sediment controls.
- 17% related to flora and fauna management.
- 17% related to hazardous substances management.
- 17% related to missing updates to WEMPs.
- 17% related to inaccurate heritage consent documentation listed on the WEMP.
- 7% related to location of environmental controls on the WEMP.

These figures are reflective of the types of works happening across the Project. The D&C Subcontractor has continued their on-site environmental management, however the reporting period saw an increase in the number of findings by one compared to the previous reporting period.

Two opportunities for improvement were closed during this reporting period, and zero opportunities for improvement remain open from previous reporting periods.

The reporting period saw a decrease in the number of findings open compared to the previous reporting period. In total there is zero outstanding findings remaining open from previous reporting periods.

### **3.4.1 West Zone**

Refer to Section 2.3.1 for an update on construction activities in the West Zone.

No opportunities for improvement and observations were raised during WEMP audits of the West Zone in this reporting period.

### **Previous reporting periods**

No findings remain open from previous reporting periods.

## **3.4.2 Tunnel Zone**

Refer to Section 2.3.1 for an update on construction activities in the Tunnel Zone.

Seven observations were raised during WEMP audits of the Tunnel Zone in this reporting period relating to missing updates in the WEMPs, inaccurate heritage consent documentation listed in the WEMP, improper management of hazardous substances, inadequate sediment controls, and inconsistencies in the location of environmental controls between the WEMP and conditions onsite.

One opportunity for improvement was raised during WEMP audits of the Tunnel Zone in this reporting period relating to tree protection zones (TPZs).

### **Previous reporting periods**

No findings remain open from previous reporting periods.

## **3.4.3 East Zone**

Refer to Section 2.3.1 for an update on construction activities in the East Zone.

Two observations were raised during WEMP audits of the East Zone in this reporting period relating to improper management of hazardous substances and tree protection zones (TPZs).

Two opportunities for improvement were raised during WEMP audits of the East Zone in this reporting period relating to inadequate sediment controls onsite.

### **Previous reporting periods**

Two opportunities for improvement were closed from previous reporting periods.

No opportunities for improvement remains open from previous reporting periods.



Photo 6 – Footscray Road Veloway – East Zone (Source: WGTP MRPV, 3 July 2024)

## 4 AUDIT CONCLUSIONS

### Environmental Management Strategy

Project Co is generally meeting their obligations under the Strategy. No adverse findings were raised during this reporting period.

No findings remain open from previous reporting periods.

These findings are detailed further in Section 3.1 of the report.

### Environmental Performance Requirements

During the last six-month reporting period the IREA formally audited 44 EPRs. All EPRs audited during the reporting period were deemed compliant. The findings raised consisted of:

- No non-conformances were raised during this audit period.
- No opportunities for improvement were raised.
- No observations were raised during this audit period.

One opportunity for improvement was closed against Business (BP5) from previous reporting periods. In total there are 6 findings remaining open at the end of this reporting period, comprising of 6 opportunities for improvement. The IREA will continue to work with Project Co/D&C Subcontractor to close out any outstanding findings.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status and the upcoming EPR auditing schedule.

### Construction Environmental Management Plan

The last six-month reporting period focused on auditing a range of CEMP elements and subplans.

The CEMP audit findings for the May 2024 quarterly audit is summarised below:

- No non-conformances were raised during this audit.
- One opportunity for improvement was raised during this audit.
- No observations were raised during this audit.

The CEMP audit findings for the August 2024 quarterly audit is summarised below:

- No non-conformances were raised during this audit.
- No opportunities for improvement were raised during this audit.
- One observation was raised during this audit.

One opportunity for improvement was closed from previous reporting periods against the Water Management Plan. In total there are 2 findings remaining open at the end of this reporting period, comprising 2 opportunities for improvement. The IREA will continue to work with Project Co / D&C Subcontractor to close out any outstanding findings.

Details of the CEMP findings are listed in Section 3.3.

### Worksite Environment Management Plans

During the reporting period six WEMP audits were conducted. A total of twelve findings were raised in this reporting period. These consisted of:

- No non-conformances.
- Three opportunities for improvement.
- Nine observations.

The D&C Subcontractor has maintained their system processes and environmental management on site, with the number of new audit findings rising from eleven findings in the previous reporting period to twelve during this reporting period. Two opportunities for improvement were closed during this reporting period. In total there is zero (0) WEMP audit findings remaining open.

The WEMP findings are further detailed in Section 3.4.

## Conclusions

The findings arising from the reporting period by the IREA have not identified any immediate significant or material risks to the environment.

Implementation of the EPRs was found to be generally compliant, with zero (0) opportunity for improvement and zero (0) observations during the reporting period.

Four audit findings from previous reporting periods were closed, including one CEMP findings (one opportunity for improvement), two WEMP findings (two opportunities for improvement) and one EPR finding (one opportunity for improvement). In total there are 8 findings remaining open at the end of this reporting period, comprising 8 opportunities for improvement. The IREA will continue to work with Project Co/D&C Subcontractor to close out any outstanding findings.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status and the upcoming EPR auditing schedule.



Photo 7 – Northern Portal – Tunnel Zone (Source: WGTP MRPV, 3 July 2024)

## **APPENDIX A- EPR AUDITING STATUS**

Phase: D = Design; PC = Pre-construction; C = Construction; PC = Pre-operation; O = Operation

Type of review and surveillance: MP = Management Plan; DP = Design Package; CR = Construction Documentation Review; CS = Construction Surveillance

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
<b>ENVIRONMENTAL MANAGEMENT</b>												
EMP1	Environmental Management Strategy	X								All	The IREA audited this EPR in August 2018 and it was deemed compliant. The IREA do not intend to audit this EPR again unless the EMS is updated.	Project Co (WGTP MRPV will publish the Strategy)
EMP2	Environmental Management Plans	X		X	X	X				All	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C / OpCo
EMP3	Environmental Compliance								X	PC, C, O	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C / OpCo (WGTP MRPV will forward audit reports to Minister for Planning and will publish audit reports only)
EMP4	Complaints Management System	X				X				PC, C	The IREA audited this EPR in May 2024 and it was deemed compliant, while noting the previous findings remain open. An opportunity for improvement was raised in August 2018 (Aug-18_EPR_04) and another in May 2019 (May-19_EPR_02). Both findings remain open.	D&C
<b>AIR QUALITY</b>												
AQP1	Tunnel Ventilation System Design		X			X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
AQP2	Zero Portal Emissions		X		X					D, O	The IREA audited this EPR in May 2020 and it was deemed compliant. As the design component is complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C / OpCo
AQP3	In Tunnel Air Quality		X		X					D, O	The IREA audited this EPR in May 2020, and it was deemed compliant. As the design component is complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C / OpCo
AQP4	Ambient Air Quality Monitoring	X			X	X				C, O	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C / OpCo
AQP5	In Tunnel Air Quality and Ventilation Structure Emissions Compliance									O	Not yet audited. Not applicable to construction phase. Ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	OpCo
AQP6	Air Quality During Construction	X		X	X	X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
AQP7	Roadside Air Quality Mitigation Strategy									O	Not yet audited. Not applicable to construction phase.	WGTP MRPV
<b>BUSINESS</b>												
BP1	Damage or Impacts on Third Party Property and Infrastructure	X	X	X	X			X		D, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
BP2	Access and Amenity for Business and Commercial Facilities		X	X	X			X		D, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
BP3	Screening		X	X	X			X		C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
BP4	Impacts on Operation of Community, Private Recreation and Council Facilities and Services		X	X	X			X		All	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C / OpCo
BP5	Business Involvement Plan	X		X	X				X	PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant, while noting the previous findings remain open. An opportunity for improvement was raised in August 2018 (Aug-18_EPR_07) and remains open.	D&C
BP6	Utility Assets		X	X	X				X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
BP7	Gas Utilities		X	X	X				X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
BP8	Business Disruption		X	X	X				X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
BP9	Business Acquisition Process		X	X	X					D, C	The IREA audited this EPR in November 2021 and it was deemed compliant. MRPV has confirmed that ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	WGTP MRPV
<b>CULTURAL HERITAGE</b>												
CHP1	Cultural Heritage Management Plan	X	X	X	X	X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
CHP2	Design and Construction to Minimise Impacts on Heritage		X	X	X			X		D, PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CHP3	Archaeological Management Plan	X		X	X			X		PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CHP4	Monitoring of Heritage Sites and Places		X	X	X					C	The IREA audited this EPR in February 2024 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
CHP5	Archival Photographic Records		X							PC	The IREA audited this EPR in May 2023 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
CHP6	Port Phillip Monument		X					X		D, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CHP7	Heritage Interpretation Strategy	X	X					X		PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CHP8	Shipwrecks	X	X	X	X					PC, C	The IREA audited this EPR in May 2023 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
CHP9	Maribyrnong River Front (Footscray)		X	X	X	X				D	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
CHP10	Bluestone Bridge		X					X		C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C



Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
CHP11	Rail Turntables		X	X	X					D	The IREA audited this EPR in November 2019 and it was deemed complaint. As the design component is complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
CHP12	Flinders Street							X		C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
<b>CONTAMINATED SOIL AND SPOIL MANAGEMENT</b>												
CSP1	Contaminated Soil Requirements	X	X	X	X			X		C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CSP2	Contaminated Soil and Spoil Management	X	X	X	X			X		PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CSP3	Acid Sulphate Soil	X		X	X			X		PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
CSP4	Odour Management	X		X	X			X		C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
<b>ECOLOGY</b>												
EP1	Minimise Vegetation Removal and Disturbance		X	X	X		X			D, PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
EP2	Vegetation Protection Measures	X	X	X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
EP3	Reinstatement		X	X	X				X	C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
EP4	Fauna Management Measures	X	X	X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
EP5	Works on Waterways		X	X	X	X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
EP6	Landscaping Plan		X					X		D, PC, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
EP7	Vegetation Offsets	X		X	X					C	The IREA audited this EPR in August 2023 and it was deemed compliant. As the design component is complete and construction areas substantially established, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	WGTP MRPV D&C
<b>GREENHOUSE GAS EMISSIONS</b>												
GGP1	Greenhouse Gas Emissions		X	X	X	X				D	The IREA audited this EPR in May 2024 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
GGP2	Emissions Reduction		X	X	X	X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
<b>GROUND MOVEMENT</b>												
GMP1	Geotechnical Model and Assessment		X	X	X				X	PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
GMP2	Tunnel and Portal Drainage		X	X	X		X			D, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
GMP3	Condition Surveys and Determination of Settlement Criteria for Property and Infrastructure		X	X	X	X				PC, C, O	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C / OpCo

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
GMP4	Settlement Criteria for Utilities		X	X	X		X			PC	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
GMP5	Ground Movement Monitoring	X	X	X	X				X	PC, C, O	The IREA audited this EPR in February 2024. No finding was raised, a related finding raised in November 2021 (Nov-21_EPR_13) remains open.	D&C / OpCo
GMP6	Mitigation of Ground Movement Impact	X	X	X	X		X			C, O	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C / OpCo
<b>GROUNDWATER</b>												
GWP1	Groundwater Management Measures	X	X	X	X		X			PC, C, O	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C / OpCo
GWP2	Protection of Groundwater Quality	X		X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
GWP3	Tunnel Drainage Design and Construction Methods		X	X	X				X	D, PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
GWP4	Predictive Groundwater Model		X	X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
GWP5	Groundwater Monitoring			X	X		X			PC, C, O	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C / OpCo
GWP6	Interception of Groundwater	X	X	X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
GWP7	Impacts on Groundwater Users		X	X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
<b>LAND USE</b>												
LPP1	Minimise Design Footprint		X							D	The IREA audited this EPR in May 2022 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
LPP2	Recreation Facilities		X	X	X				X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
LPP3	Future Development Opportunities		X							D	The IREA audited this EPR in May 2021 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
LPP4	Pedestrian and Bicycle Connections		X							D	The IREA audited this EPR in May 2021 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
LPP5	Public Land		X	X	X				X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
<b>LANDSCAPE AND VISUAL</b>												
LVP1	Urban Design Approach		X	X	X					D, C	The IREA audited this EPR in February 2023 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
LVP2	Reinstatement Following Temporary Works		X						X	D, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
LVP3	Light Spillage	X	X	X	X			X		D, C	The IREA audited this EPR in November 2023 and it was deemed compliant.	D&C
LVP4	Vegetation Screening		X							C	The IREA audited this EPR in November 2023 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
LVP5	Design Review							X		D	The IREA audited this EPR in November 2023 and it was deemed compliant.	WGTP MRPV (on receipt of relevant design documentation in accordance with the design review process)
<b>NOISE AND VIBRATION</b>												
NVP1	Traffic Noise Limits		X	X	X		X			D, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP2	Traffic Noise Reduction of Open Space		X	X	X	X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
NVP3	Maintenance of Noise Mitigation Measures									O	N/A - operational EPR	OpCo (for the maintenance of noise mitigation measures in accordance with sections 18.4 and 18.5 of Part B, otherwise WGTP MRPV)
NVP4	Traffic Noise Reduction of Millers Road North of West Gate Freeway								X	PO	The IREA audited this EPR in February 2024 and it was deemed compliant.	State
NVP5	Construction of Noise Barriers		X	X	X	X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
NVP6	Traffic Noise Monitoring		X							PO, O	Based on Project status this is currently not relevant.	OpCo (for the O&M phase in accordance with sections 18.4 and 18.5 of Part B, otherwise WGTP MRPV)
NVP7	Construction Noise, Vibration Management, and Monitoring	X		X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP8	Construction Noise Targets			X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP9	Blasting Trials and Assessment									C	The IREA audited this EPR in February 2019 and it was deemed compliant. It will not be audited in the 2023 – 2024 audit period as it is not relevant to the current scope.	D&C
NVP10	Construction Vibration Targets (Amenity)			X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP11	Construction Vibration Targets (Structures)			X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP12	Ground-borne (Internal) Noise Targets					X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
NVP13	Utility Asset Protection		X	X	X		X			PC, C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP14	Tunnel Ventilation System Noise Design				X					D, O	The IREA audited this EPR in May 2020 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C / OpCo

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
NVP15	Tunnel Ventilation System Noise Monitoring									O	N/A - operational EPR	OpCo
NVP16	Amenity Blast Vibration									C	The IREA audited this EPR in February 2019 and it was deemed compliant. It will not be audited in the 2023 – 2024 audit period as it is not relevant the current scope.	D&C
NVP17	Amenity Blast Overpressure Implement									C	The IREA audited this EPR in February 2019 and it was deemed compliant. It will not be audited in the 2023 – 2024 audit period as it is not relevant to the current scope.	D&C
NVP18	Construction Noise Management	X		X	X		X			C	The IREA audited this EPR in August 2024 and it was deemed compliant.	D&C
NVP19	Traffic Noise of Hyde Street, South of Francis Street									C	The IREA audited this EPR in February 2020 and it was deemed compliant. It will not be audited in the 2023 – 2024 period as it is considered closed.	WGTP MRPV
<b>SOCIAL</b>												
SP1	Urban Design Principles and Vision		X			X				D	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SP2	Communications and Community Engagement Plan (CCEP)	X		X	X	X				PC, C, O	The IREA audited this in May 2024, and it was deemed compliant, while noting the previous findings remain open. Two opportunities for improvement were raised in May 2019 (May-19_EPR_26, May-19_EPR_27) and remain open.	D&C / OpCo
SP3	Community Liaison Group Participation								X	C	The IREA audited this in February 2024 and it was deemed compliant.	D&C / WGTP MRPV
SP4	Social and Local Procurement	X							X	PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
SP5	Community Involvement and Participation Plan (CIPP)	X							X	PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	WGTP MRPV
<b>SURFACE WATER</b>												
SWP1	Design of Discharges and Runoff		X							D	The IREA audited this EPR in May 2021 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
SWP2	Water Sensitive Road Design		X							D	The IREA audited this EPR in November 2019 and it was deemed compliant. It will not be audited in the current audit period as it is considered closed.	D&C
SWP3	Tunnel Waste Water		X	X	X					PC	The IREA audited this EPR in February 2020 and it was deemed compliant. This EPR relates to operations-phase waste water. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
SWP4	Water Quality Monitoring	X		X	X					PC	The IREA audited this EPR in August 2018 and it was deemed compliant. It will not be audited in the current audit period as it is considered closed.	D&C
SWP5	Spill Containment Design		X		X					D	The IREA audited this EPR in November 2019 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
SWP6	Management of Chemicals, Fuels, and Hazardous Materials	X		X	X	X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SWP7	Surface Water Management During Construction	X		X	X	X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SWP8	Use of non-potable water		X	X	X				X	C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
SWP9	Bank Stability		X	X	X	X				C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SWP10	Waterway Modifications		X			X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SWP11	Flood Levels, Flows and Velocities		X	X	X	X				D, PC, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
SWP12	Floodplain Storage Capacity		X	X	X					D	The IREA audited this EPR in May 2021 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
SWP13	Tunnel Portal Flood Risk		X		X					D, O	The IREA audited this EPR in November 2019 and it was deemed compliant. As relevant design components are component is complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C / OpCo
SWP14	Maintenance of Melbourne water and Other Drainage Assets		X	X	X					D	The IREA audited this EPR in May 2020 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
SWP15	North Yarra Main Sewer		X							D	The IREA audited this EPR in February 2019 and it was deemed compliant. It will not be audited in the current audit period as it is considered closed.	D&C
<b>TRANSPORT</b>												
TP1	Optimise Design Performance		X							D	As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
TP2	Traffic Monitoring			X	X	X				PC, C, O	The IREA audited this in May 2024 and it was deemed compliant.	D&C / OpCo
TP3	Traffic Management Plan	X		X	X	X				PC, C	The IREA audited this in May 2024 and it was deemed compliant.	D&C
TP4	Public Transport		X	X	X				X	PC, C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C
TP5	Rail operations		X			X				D, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
TP6	Design Standards		X		X					D, C	The IREA audited this EPR in August 2021 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing.	D&C
TP7	Traffic Management Liaison Group			X	X	X				PC, C	The IREA audited this EPR in May 2024 and it was deemed compliant.	D&C
TP8	River Navigation		X	X	X				X	C	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C

Environmental Performance Requirements		Review & Surveillance				Audit				Phase *	Audit and Audit Findings Status (As of August 2024)	Responsible Party
		MP	DP	CR	CS	May-24	Aug-24	Nov-24	Feb-25			
TP9	Melbourne Metro Rail Authority Interface				X					C	The IREA audited this EPR in August 2022 and it was deemed compliant. As relevant design components are complete, ongoing surveillance of the implementation of this EPR will be through other established IREA monitoring processes, rather than explicit auditing, until the operations phase is relevant.	D&C
<b>WASTE MANAGEMENT</b>												
WMP1	Waste Management	X	X	X	X				X	D, C, O	The IREA audited this EPR in February 2024 and it was deemed compliant.	D&C / OpCo

**APPENDIX B - IREA SPECIALIST TEAM**

The formal audits described in this Minister's Report have been undertaken by the lead IREA Environment Auditor, Hilary Chapman and Assistant Environment Auditors, Milo Logreira, Jamie Crawford, and Jin-Sol Lee. The Lead Auditor was supported by a team of specialists, including (but not limited to):

- IREA Construction Noise and Vibration Subject Matter Expert – Tim Ryan
- IREA Groundwater Subject Matter Expert – Ellen Kwantes
- IREA Greenhouse Gas Emissions Subject Matter Expert – Jenny Lewis
- IREA Technical Lead for Ground Movement – Waiyee Soo

This report has been reviewed by the IREA Representative, Geoff Shepherd.



**APPENDIX C - AUDIT LIMITATIONS**

This report was prepared in accordance with generally accepted consulting practice for audit services. The environmental audit requires the IREA to apply a process of “general overview and reasonable checking” of the Project documentation and Design and Construction activities (as required under the contract between the IREA and Project Co / WGTP MRPV). The audit program is risk-based, targeting those Design and Construction activities with a potential for risk to the environment or to environmental management arrangements. Accordingly, it is possible that not all environmental issues will be examined during each audit. However, the IREA maintains a structured program of audits designed to cover all aspects of the Project and to enable the formation of an opinion on whether there is conformance with the requirements of the Strategy, CEMP (and subordinate documentation), WEMPs, and the EPRs (as applicable).