



North East Link Program - Freeway  
Packages Independent Environmental  
Auditor

# Six-Monthly Summary

## Report:

May 2025 – October 2025

Report to the Minister for Planning

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## Document Approval

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## Document review and approval

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### Inherent Limitations

This report has been prepared as outlined in the Scope and Approach Section and provides a summary of KPMG’s work undertaken over the period May to October 2025 inclusive. KPMG’s full detailed findings are contained in respective reports prepared across this period. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and consequently no opinions or conclusions intended to convey assurance have been expressed.

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

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the Victorian Infrastructure Delivery Authority Roads (VIDA Roads), the M80 Ring Road Alliance (M80RRA), the Eastern Freeway Burke to Tram Road Alliance (EBTA), the Eastern Freeway Hoddle to Burke Alliance (EHBA) and the Eastern Freeway Tram to Springvale Alliance (ETSA) consulted as part of the process. KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

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

### Third Party Reliance

This report is solely for the purpose set out in the Scope and Approach Section and for VIDA Road’s and the Minister for Planning’s information, and is not to be used for any other purpose or distributed to any other party without KPMG’s prior written consent.

This report has been prepared at the request of the VIDA Roads, a division of the Victorian Infrastructure Delivery Authority (VIDA) (an administrative office in relation to the Department of Transport and Planning), in accordance with the terms of KPMG’s engagement contract dated 27 June 2023. Other than our responsibility to VIDA Roads and the Minister for Planning, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party’s sole responsibility.

# Executive Summary

## Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that the Victorian Infrastructure Delivery Authority Roads (VIDA Roads), which is delivering the NEL Program (NELP) on behalf of the State, provides Six-Monthly Summary Reports on compliance of construction activities with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning. This Report presents the NELP Freeway Packages Independent Environmental Auditor (FIEA) Six-Monthly Summary Report covering the period May 2025 to October 2025 inclusive (herein referred to as this Reporting Period).

The NEL connects the Eastern Freeway at Bulleen Road, Bulleen to the M80 Ring Road at Greensborough Bypass via a new roadway. It also provides for upgrading the Eastern Freeway between Springvale Road and Hoddle Street, and the M80 Ring Road between Greensborough and Plenty Roads. NEL is being delivered as a Program comprising several packages:

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

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

- Audits conducted by the FIEA on activities associated with the Alliances delivering the NELP Freeway Packages (covering the North, South, East and West Packages for this Reporting Period). The North Package is being delivered by the M80 Ring Road Alliance (M80RRA), the South Package by the Eastern Freeway Burke to Tram Alliance (EBTA), the East Package by the Eastern Freeway Tram to Springvale Alliance (ETSA), and the West Package by the Eastern Freeway Hoddle to Burke Alliance (EHBA).

This Report has been prepared by KPMG, engaged by VIDA Roads as the FIEA in accordance with Section 2 *Roles and Responsibilities* of the EMF.

For the purposes of the FIEA services and as defined in the EMF, 'audit' refers to assessment of compliance with the EMF, relevant EPRs, Environmental Strategy, Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), other plans as required by the EPRs and conditions of Program approvals, adopting a risk-based approach (founded in the guiding principles of *AS/NZS ISO 19011:2019 Guidelines for auditing management systems*). Any references to 'audit' in this Report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance

Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this Report.

The EPRs comprise a suite of 110 performance-based environmental standards and outcomes across 17 topics, intended to minimise impacts and the risk of harm to human health and the environment to within reasonable limits having regard to contextual factors and the practical delivery of the Program. Compliance with the EMF and EPRs is mandated by the terms of the North East Link Project Incorporated Document, December 2019 (amended September 2023), which requires the use and development of the Program to be in accordance with the EMF and EPRs approved by the Minister for Planning.

Each Freeway Package Alliances' activities and scope of works must comply with all relevant EPRs. Not all EPRs are applicable to the Freeway Packages, nor to every stage of the Freeway Packages works. In addition, not all the EPRs are the responsibility of the Freeway Package Alliance, with VIDA Roads being fully or partially responsible for compliance with specific EPRs.

## **Audit Activities**

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

The FIEA also conducts additional compliance audits on other packages of work that may arise during delivery of the NELP, including under a risk-based approach as required by VIDA Roads and conducting audits on VIDA Roads, which is responsible either in full or partially, for compliance with 20 EPRs that apply on a Project-wide basis. The FIEA is responsible for assessing VIDA Roads' compliance with 18 of these Project-wide EPRs, although a Project-wide EPR Compliance Audit was not conducted by the FIEA during this Reporting Period (Note: a Project-wide EPR Compliance Audit was conducted by the FIEA in November 2024, with the next audit scheduled for November 2025). The Central Package Independent Reviewer and Environmental Auditor (CP IREA) is responsible for assessing VIDA Roads' compliance with the remaining two (2) Project-wide EPRs.

The Compliance Audit Program methodology was developed by applying a risk-based approach, and with reference to the principles described in *AS/NZS ISO 19011:2019 Guidelines for auditing management systems*. Given a risk-based approach is applied to the Compliance Audit Program, each audit does not involve an exhaustive assessment against every requirement of the EMF nor every EPR. Whilst higher-risk activities are audited more frequently, the Compliance Audit Program is conducted to assess compliance with all relevant EPRs at least once every 12 months.

A total of 14 Compliance Audits were conducted by the FIEA during this Reporting Period as summarised in Table E.1.



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

Package	May 2025	Jun 2025	Jul 2025	Aug 2025	Sept 2025	Oct 2025	No. of EPRs assessed during Reporting Period
<b>North Package (M8ORRA)</b>	EMF and EPR Compliance Audit	Env Perf <sup>1</sup> Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	71 of the 95 relevant EPRs
<b>South Package (EBTA)</b>	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	69 of the 90 relevant EPRs
<b>East Package (ETSA)</b>	-	-	-	Env Perf Audit	-	-	30 of the 93 relevant EPRs
<b>West Package (EHBA)</b>	-	-	Env Perf Audit	-	-	-	53 of the 101 relevant EPRs
<b>Project-wide EPRs (VIDA Roads)</b>	-	-	-	-	-	-	N/A

<sup>1</sup> Env Perf Audit refers to Environmental Performance Audit

## Audit Findings, Corrective Actions and Compliance

### North Package

The findings raised during the FIEA Compliance Audit Program conducted on the North Package M80 Ring Road Alliance (M80RRA) for this Reporting Period and the close out of findings within this Reporting Period are summarised in Table E.2.

**Table E.2 – North Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Non-Compliance</b>	0	7	6	1
<b>Area for Improvement (AFI)</b>	4	14	15	3
<b>Observation</b>	2	13	12	3
<b>Total</b>	<b>6</b>	<b>34</b>	<b>33</b>	<b>7</b>

North Package (M80RRA) construction activities were considered to be compliant with 67 of the 71 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

During this Reporting Period, seven (7) Non-compliance findings were raised against four (4) EPRs. Six (6) of the seven (7) Non-compliance findings that were raised during this Reporting Period were closed. The one (1) Non-compliance finding that remained open at the end of this Reporting Period was related to Social and Community EPR SC3.

Additionally, 14 AFIs were raised against 11 EPRs during this Reporting Period with four (4) AFIs that were open from the end of the previous Reporting Period across four (4) EPRs. 15 AFIs were closed during this Reporting Period, which is inclusive of all four (4) AFIs from the previous Reporting Period (November 2024 to April 2025). The three (3) AFIs that remained open at the end of this Reporting Period included one (1) AFI that was related to Flora and Fauna EPR FF3 and two (2) AFIs that were related to Surface Water EPR SW5.

Thirteen (13) Observations were raised against 10 EPRs during this Reporting Period with two (2) Observations that were open from the end of the previous Reporting Period across Air Quality EPR AQ1. Twelve (12) Observations were closed during this Reporting Period, which were all raised during this Reporting Period. The three (3) Observations that remained open at the end of this Reporting Period included the two (2) Observations related to Air Quality EPR AQ1 that were open at the beginning of this Reporting Period and one (1) Observation related to Surface Water EPR SW5, which was identified during this Reporting Period.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

### **South Package**

The findings raised during the FIEA Compliance Audit Program conducted on the South Package Eastern Freeway Burke to Tram Alliance (EBTA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table E.3.

**Table E.3 – South Package Summary of Findings**

<b>Finding Type</b>	<b>Open at beginning of Reporting Period</b>	<b>Raised during Reporting Period</b>	<b>Closed during Reporting Period</b>	<b>Open at end of Reporting Period</b>
<b>Non-Compliance</b>	5	6	7	4
<b>Area for Improvement (AFI)</b>	7	24	18	13
<b>Observation</b>	5	7	7	5
<b>Total</b>	<b>17</b>	<b>37</b>	<b>32</b>	<b>22</b>

The South Package (EBTA) activities were considered to be compliant with 65 of the 69 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

During this Reporting Period, six (6) Non-compliance findings were raised across four (4) EPRs with five (5) Non-compliance findings that were open from the end of the previous Reporting Period across three (3) EPRs. A total of seven (7) Non-compliance findings were closed during this Reporting Period, which was inclusive of four (4) Non-compliance findings from the previous Reporting Period and three (3) Non-compliance findings that were raised during this Reporting period. The four (4) Non-compliance findings that remained open at the end of this Reporting Period included: One (1) each related to Contamination and Soil EPR CL1, Contamination and Soil EPR CL5 and Surface Water EPR SW5 that were raised during this Reporting Period; and One (1) raised against EPR NV4 from the previous Reporting Period.

Additionally, 24 AFIs were raised against seven (7) EPRs during this Reporting Period with seven (7) AFIs that were open from the end of the previous Reporting Period across five (5) EPRs. 17 AFIs were closed during this Reporting Period, which was inclusive of all seven (7) AFIs from the previous Reporting Period and 10 AFIs from this Reporting period. The 13 AFIs raised during this Reporting Period that remained open at the end of this Reporting Period are related to the following four (4) EPRs: One (1) each related to Business EPR B1 and Contamination and Soil EPR CL5; Two (2) related to Social and Community EPR SC3; and nine (9) related to Surface Water EPR SW5.

Furthermore, seven (7) Observations were raised against six (6) EPRs during this Reporting Period with five (5) Observations that were open from the end of the previous Reporting Period across five (5) EPRs. A total of seven (7) Observations were closed during this Reporting Period, which was inclusive of all five (5) Observations from the previous Reporting Period and two (2) Observations that were raised during this Reporting Period. The five (5) Observations that remained open at the end of this Reporting Period were related to the following three (3) EPRs which were identified during this Reporting Period: One (1) each related to Environmental Management Framework EPR EMF1; Business EPR B1 and Contamination and Soil EPR CL1; and two (2) related to Social and Community EPR SC3.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

### **East Package**

The findings raised during the FIEA Compliance Audit Program conducted on the East Package Eastern Freeway Tram to Springvale Alliance (ETSA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table E.4.

**Table E.4 – East Package Summary of Findings**

<b>Finding Type</b>	<b>Open at beginning of Reporting Period</b>	<b>Raised during Reporting Period</b>	<b>Closed during Reporting Period</b>	<b>Open at end of Reporting Period</b>
<b>Non-Compliance</b>	0	0	0	0
<b>Area for Improvement (AFI)</b>	0	3	0	3
<b>Observation</b>	0	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>

The East Package (ETSA) activities were considered to be compliant with all 30 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. No Non-compliances or Observations were raised during this Reporting Period, however, three (3) AFIs were raised against two (2) EPRs being Arboriculture EPR AR2 and Contamination and Soil EPR CL5. All AFIs remained open at the end of this Reporting Period.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

## West Package

The findings raised during the FIEA Compliance Audit Program conducted on the West Package Eastern Freeway Hoddle to Burke Alliance (EHBA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table E.5.

**Table E.5 – West Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Non-Compliance</b>	0	2	0	2
<b>Area for Improvement (AFI)</b>	0	6	0	6
<b>Observation</b>	0	0	0	0
<b>Total</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>8</b>

The West Package (EHBA) activities were considered to be compliant with 51 of the 53 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

During this Reporting Period, two (2) Non-compliance findings were raised against two (2) EPRs being Environmental Management Framework EPR EMF2 and Flora and Fauna EPR FF8. Additionally, six (6) AFIs were raised against four (4) EPRs during this Reporting Period, which were related to Environmental Management Framework EPR EMF2, Noise and Vibration EPR NV4, Surface Water EPR SW4 and Landscape and Visual EPR LV2.

All Non-compliance findings and AFIs remained open at the end of this Reporting Period.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

## Project-wide EPRs (VIDA Roads)

A Project-wide EPR Compliance Audit was not conducted during this Reporting Period.

The FIEA notes that the closure of the three (3) AFIs and the Observation which remained open at the end of the previous Reporting Period (i.e., November 2024 to April 2025) will be assessed by the FIEA during the next Reporting Period (i.e., November 2025 to April 2025).

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## Abbreviations and Glossary

Abbreviation	Expanded Form
<b>AFI</b>	Area for Improvement
<b>AS/NZS</b>	Australian/New Zealand Standard
<b>CCP</b>	Construction Compound Plan
<b>CEMP</b>	Construction Environmental Management Plan
<b>CHMP</b>	Cultural Heritage Management Plan
<b>CP IREA</b>	Central Package Independent Reviewer and Environmental Auditor
<b>DEECA</b>	Department of Energy, Environment and Climate Action
<b>DTP</b>	Department of Transport and Planning
<b>EES</b>	Environment Effects Statement
<b>EBTA</b>	Eastern Freeway Burke to Tram Road Alliance
<b>EHBA</b>	Eastern Freeway – Hoddle to Burke Alliance
<b>EMF</b>	Environmental Management Framework, January 2020
<b>EPA</b>	Environment Protection Authority Victoria
<b>EPR</b>	Environmental Performance Requirement
<b>FIEA</b>	Freeway Packages Independent Environmental Auditor
<b>FP</b>	Freeway Packages
<b>IEA</b>	Independent Environmental Auditor
<b>IR</b>	Independent Reviewer (a component of the broader CP IREA)
<b>ISO</b>	International Standard Organisation
<b>M80RRA</b>	M80 Ring Road Alliance
<b>VIDA Roads</b>	Victorian Infrastructure Delivery Authority Roads
<b>MTIA</b>	Major Transport Infrastructure Authority
<b>NEL</b>	North East Link
<b>NELEW</b>	North East Link Enabling Works
<b>NEL FP</b>	North East Link Freeway Packages
<b>NELP</b>	North East Link Program
<b>NOPs</b>	Non-Owner Participants
<b>OEMP</b>	Operations Environmental Management Plan
<b>SDP</b>	Service Delivery Plan
<b>SMP</b>	Spoil Management Plan
<b>SuMP</b>	Sustainability Management Plan
<b>TMP</b>	Transport Management Plan
<b>ETSA</b>	Tram to Springvale Alliance
<b>VIDA</b>	Victorian Infrastructure Delivery Authority

**WEMP** Worksite Environmental Management Plan (also referred to as Worksite Environmental Implementation Plan within EMF)

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

<b>Non-contestable Works</b>	Non-contestable works typically involve regular maintenance, operation, and administration of a distribution network. These works are exclusive to the incumbent distributor.
<b>North East Link Central Package</b>	The Central Package, which comprises Victoria’s longest twin road tunnels under the Yarra River, has commenced delivery and is being delivered as an availability Public Private Partnership (PPP) by Project Co.
<b>North East Link Enabling Works</b>	North East Link Enabling Works (NELEW) was the first package of works for the Program, comprising the design development and potential modification, relocation and/or protection of utility services which will be impacted, or are in close proximity to the main North East Link works.
<b>North East Link Program (NELP) (i.e., Organisation)</b>	<p>North East Link Program (NELP) was an organisation within MTIA that was responsible for developing and delivering the Program on behalf of the Victorian Government.</p> <p>In August 2023 a dedicated road project office was established to include the North East Link Program (i.e., the Program), Westgate Tunnel Project and Major Road Projects Victoria (MRPV) under the MRPV umbrella.</p> <p>In October 2025, commercial changes resulted in changes of reference from MRPV to VIDA Roads.</p> <p>Accordingly, all references to NELP (i.e., the organisation not the Program) will now be referred to as VIDA Roads (refer to Victorian Infrastructure Delivery Authority Roads above).</p>
<b>Program or North East Link Program (NELP)</b>	The North East Link Program approved under the Incorporated Document.
<b>Review</b>	Any references to ‘review’ has not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board.
<b>Victorian Infrastructure Delivery Authority</b>	The Victorian Infrastructure Delivery Authority (VIDA) is the proponent for the Program. The VIDA is an administrative office within the Victorian Department of Transport and Planning with responsibility for overseeing major transport programs.

# 1. Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that Victorian Infrastructure Delivery Authority Roads (VIDA Roads) provides Six-Monthly Summary Reports on compliance of construction activities with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning.

In accordance with Section 7.3 *Reporting* of the EMF, these reports must summarise the audit activities undertaken during this Reporting Period covering the period May 2025 to October 2025 inclusive (herein referred to as this Reporting Period), audit findings, the status of actions taken to address previous audit findings, and the contractors' compliance with the EMF and EPRs.

## 1.1 Purpose of this Report

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

- **May 2025 to October 2025** inclusive

This Report covers:

- Audits conducted by the FIEA on activities associated with the Alliances delivering the NELP Freeway Packages (covering the North, South, East and West Packages for this Reporting Period). The North Package is being delivered by the M80 Ring Road Alliance (M80RRA), the South Package by the Eastern Freeway Burke to Tram Alliance (EBTA), the East Package by the Eastern Freeway Tram to Springvale Alliance (ETSA), and the West Package by the Eastern Freeway Hoddle to Burke Alliance (EHBA).

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

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

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

## 1.2 Report Structure

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

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

## 2. North East Link Program Overview

### 2.1 North East Link

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

The NEL includes:

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

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

- **NEL Enabling Works (NELEW)**, comprising relocation of services to enable the Program and delivery of the Bulleen Park and Ride, which commenced in 2019 and were completed in 2024;
- **Central Package**, which comprises the construction of twin road tunnels beneath the Yarra River, and is being delivered by Spark North East Link Pty Ltd as the Trustee of Spark North East Link Trust (Project Co); and,
- **Four (4) Freeway Packages** of works, which are described in Section 2.2.

The Central Package includes both an Independent Reviewer and an IEA and is consequently referred to as the Central Package IREA (CP IREA). The NELEW package included a separate IEA (NELEW IEA). Consequently, separate Six-Monthly Summary Reports have been prepared for both the Central Package and the NELEW and these should be referred to for summaries of the IEA compliance audit programs covering these packages respectively.

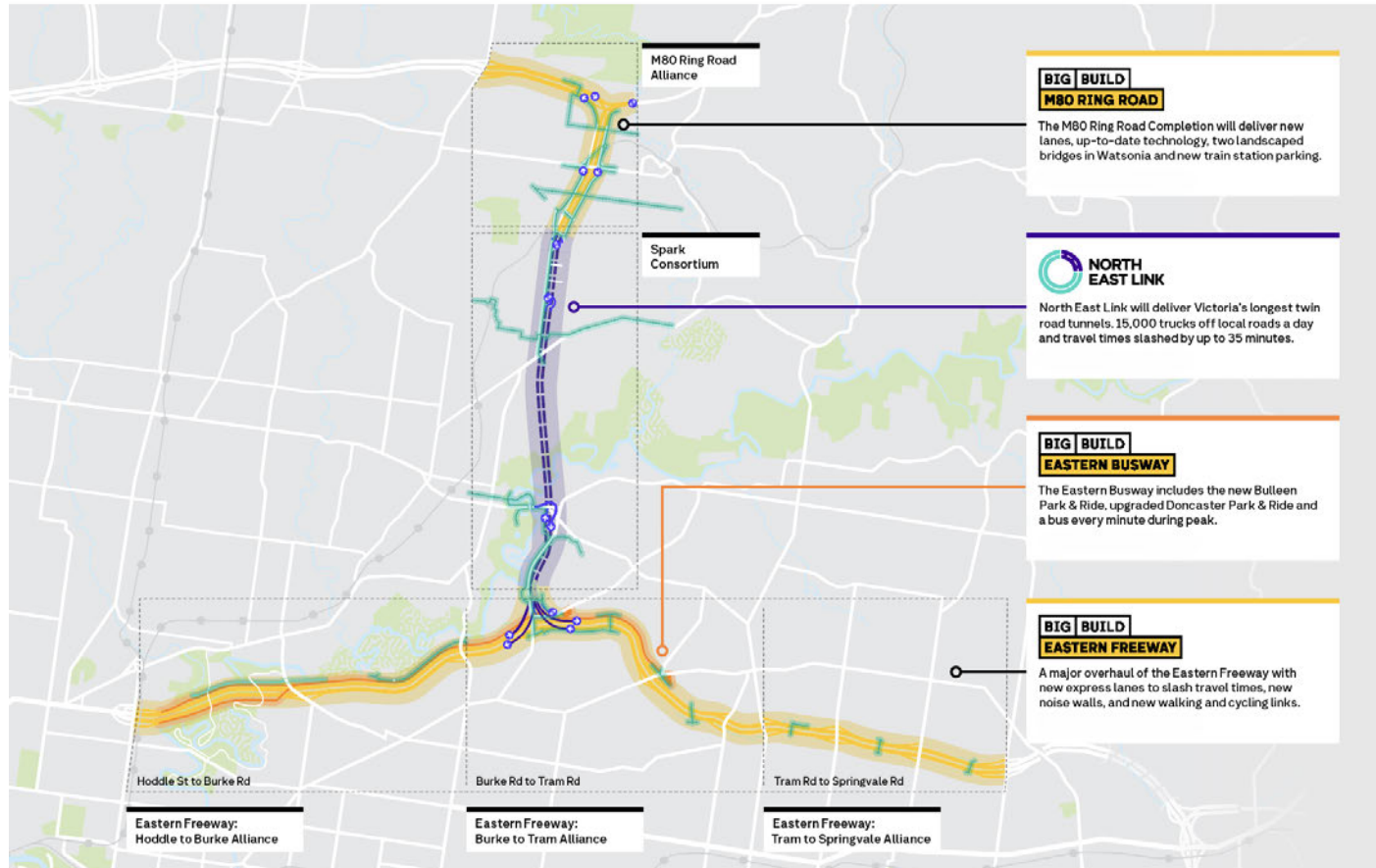


Figure 2.1: NEL Packages

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## **2.2 Freeway Packages**

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

Where applicable during this Reporting Period, it should be noted that this Report will also cover other audit activities conducted by the FIEA, including specific ‘Project-wide’ EPRs for which VIDA Roads is fully or partially responsible.

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

### **2.2.1 North Package**

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

The North Package is being delivered by the M80 Ring Road Alliance (M80RRA), which comprises VIDA Roads, Acciona Construction Australia Pty Ltd, AECOM Australia Pty Ltd and MACA Civil Pty Ltd.

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

### **2.2.2 South Package**

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

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

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

### **2.2.3 East Package**

The East Package includes the design and construction of the Eastern Freeway upgrade from Tram Road to Springvale Road, which consists of new traffic management technology, express lanes and dedicated lanes for local trips.

The East Package is being delivered by the Eastern Freeway Tram to Springvale Alliance (ETSA), which comprises VIDA Roads, CPB Contractors Pty Limited, B.M.D Constructions Pty Limited and Arup Australia Project Pty Ltd.

Construction activities associated with the East Package commenced in October 2025 with the establishment of construction compounds. Prior to this, early works, generally comprising site investigations, had been undertaken.

## 2.2.4 West Package

The West Package includes the design and construction of the Eastern Freeway upgrade from Hoddle Street to Burke Road, which consists of building Melbourne's first dedicated express busway and new walking and cycling links to the inner city.

The West Package is being delivered by the Eastern Freeway Hoddle to Burke Alliance (EHBA), which comprises VIDA Roads, Seymour Whyte Constructions Pty Ltd, John Holland Pty Ltd, Jacobs Group (Australia) Pty Ltd, Mott MacDonald Australia Pty Limited.

Construction activities associated with the West Package commenced in October 2025 with the establishment of construction compounds. Prior to this, early works, generally comprising site investigations, had been undertaken.

## 2.3 EMF and EPRs

The approved NELP Planning Scheme Amendment (GC98), under the Victorian *Planning and Environment Act 1987*, introduces the NELP Incorporated Document into the Banyule, Boroondara, Manningham, Nillumbik, Whitehorse, Whittlesea and Yarra Planning Schemes. The Incorporated Document (dated December 2019 and amended September 2023) requires the preparation of an EMF for the Program to the satisfaction of the Minister for Planning. Consequently, the NELP EMF (dated 12 July 2021), under which the Program is being delivered, was approved by the Minister for Planning on 21 July 2021.

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

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

- Roles and responsibilities for environmental management to provide a transparent framework for governing the implementation of the EMF and EPRs;
- A summary of key approvals that have/will be obtained and complied with;
- Requirements for identification, assessment and management of environmental risks;
- No-go zones for the Program;
- Environmental management documentation to prepare to address the requirements of the Incorporated Document, EMF and EPRs and manage environmental risks and impacts through design, construction and operation. This documentation, which a Contractor is required to prepare and implement, includes Environmental Strategy, Urban Design and Landscape Plans (UDLPs), Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), Construction Compound Plans (CCPs), and other plans as required by the EPRs;
- The approach to evaluating compliance with the EMF and EPRs, including monitoring, auditing and reporting processes; and
- The EPRs that define the minimum environmental outcomes that must be achieved during design, construction and operation of the NELP.

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

- Environmental management framework
- Aboriginal cultural heritage
- Air quality
- Arboriculture
- Business
- Contamination and soil
- Flora and Fauna
- Ground movement
- Groundwater
- Historic heritage
- Land use planning
- Landscape and visual
- Noise and vibration (surface and tunnel)
- Social and community
- Surface water
- Sustainability and climate change (including greenhouse gas)
- Traffic and transport.

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

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

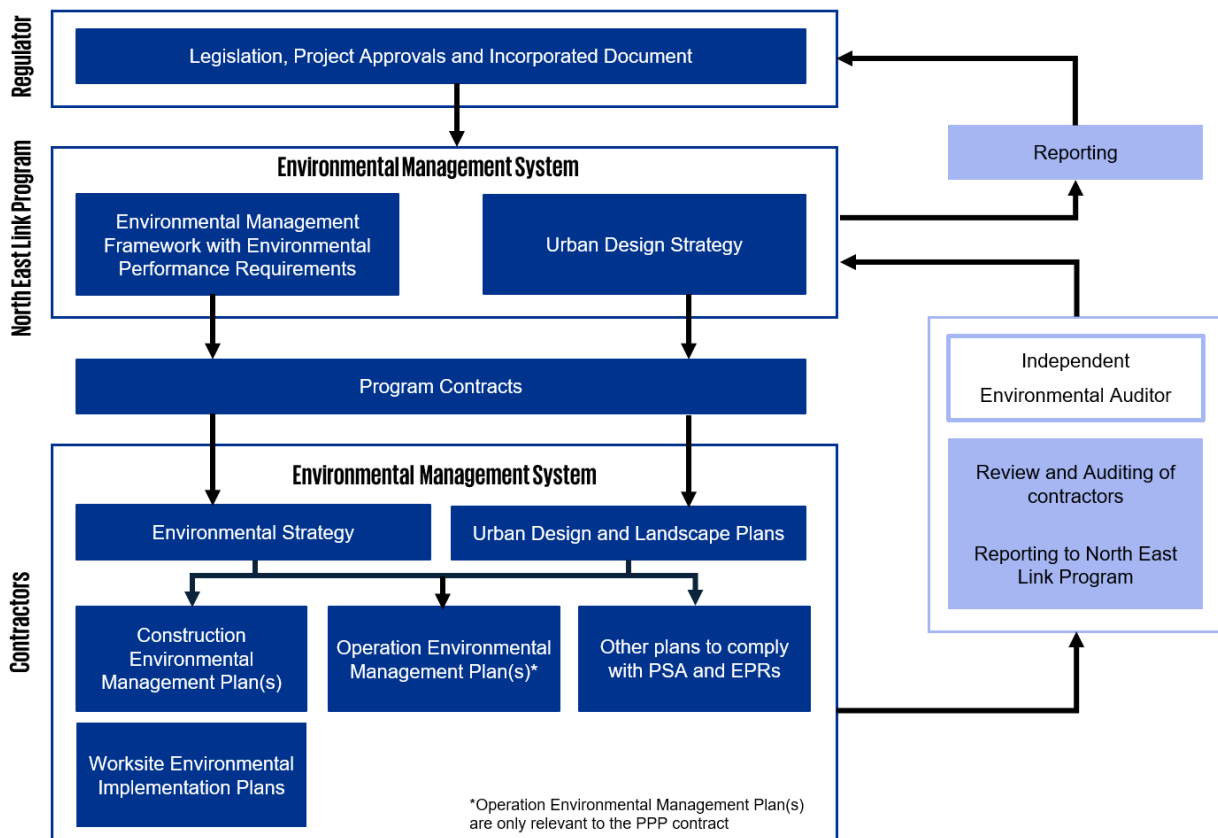
Each Freeway Package Alliances' activities and scopes of work must comply with all relevant EPRs. Not all EPRs are applicable to the Freeway Packages nor to every stage of the Freeway Packages works. In addition, not all the EPRs are the responsibility of each Freeway Package Alliance, with VIDA Roads being fully or partially responsible for compliance with specific EPRs. The EPRs audited during this Reporting Period are provided in Appendix A.

## **2.4 Independent Environmental Auditor**

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

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

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



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

## 3. Audit Activities

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

### 3.1 FIEA Compliance Audit Program

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

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

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

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

Environmental Performance Audits described above.

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The FIEA also conducts additional compliance audits that may be required under a risk-based approach (refer to Section 3.1.1 Risk-based Audit Scoping) and as required by VIDA Roads. These additional compliance audits also include conducting audits on VIDA Roads, which is responsible either in full or partially, for compliance with 20 EPRs that apply on a Project-wide basis. The FIEA is responsible for assessing VIDA Roads' compliance with 18 of these Project-wide EPRs, although a Project-wide EPR Compliance Audit was not conducted by the FIEA during this Reporting Period (Note: a Project-wide EPR Compliance Audit was conducted by the FIEA in November 2024, with the next audit scheduled for November 2025). The Central Package Independent Reviewer and Environmental Auditor (CP IREA) is responsible for assessing VIDA Roads' compliance with the remaining two (2) Project-wide EPRs.

### 3.1.1 Risk-based Audit Scoping

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

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

Given this approach, each audit did not involve an exhaustive assessment against all requirements of the EMF and EPRs. Whilst higher-risk activities were audited more frequently, the Compliance Audit Program has been conducted to assess compliance with all relevant EPRs at least once every 12 months.

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

Standing scope items that were addressed during each and every audit included:

- Assessment of corrective actions undertaken by the auditee to close out findings arising from previous audits; and,
- Review of complaints received and incidents arising across the audit period.

### 3.1.2 Approach

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

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

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

**Table 3.2: Compliance Audit approach**

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

### 3.1.3 Audit Finding Categories and Reporting

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

**Table 3.3: Audit finding categories**

Audit Finding Categories	Definition
<b>Compliance</b>	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the audit criterion.
<b>Non-compliance</b>	The absence of, or failure to implement and maintain, one or more requirements of the relevant environmental documentation, or a situation, which would, based on available objective evidence raise significant doubt as to the effectiveness of environmental management. Note: A non-compliance may be an individual non-compliance or, a number of minor but related audit

Audit Finding Categories	Definition
	non-compliances, which when considered in total are judged to constitute a non-conformance.
<b>Areas for Improvement (AFI)</b>	A deficiency in the implementation of the relevant element of the documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
<b>Observation</b>	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.
<b>Undetermined</b>	There is insufficient evidence to make a judgement on compliance.
<b>Not applicable</b>	The auditable element falls outside the scope of the audit, e.g., work relevant to the element being audited has not yet commenced.

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

### 3.2 Compliance with EMF and EPRs

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

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

Whilst the scope of the quarterly EMF and EPR Compliance Audits focused on assessing Freeway Package-level compliance with specific EPRs (as per the scope of each audit) and components of the Environment Strategy and CEMP, the scopes of the monthly Environmental Performance Audits allowed for assessment of compliance with EPRs and program approvals insofar as they were applicable at the site-level (i.e. construction work sites) subject to the Environmental Performance Audit. This resulted from assessing implementation of the WEMPs, which by their nature, include controls to comply with EMF and EPR topics appropriate to a specific construction site and activities. Consequently, in the

process of assessing compliance and providing observations and findings on WEMPs, technical adequacy and effectiveness of actions taken to comply with the EMF, EPRs, Environmental Strategy, CEMP, other plans as required by the EPRs and program approvals, insofar as they are applicable to the site subject to the monthly Environmental Performance Audit, were considered.

### 3.3 FIEA Reporting Period Audit Activities

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

A summary of the compliance audits conducted by the FIEA across this Reporting Period is provided in Table 3.4. Further details with respect to the scope of the compliance audits completed within this Reporting Period are provided for each Freeway Package, and for any additional audits conducted, in the following sections (refer to Sections 3.3.1 to 3.3.5).

**Table 3.4: FIEA Compliance Audits conducted in this Reporting Period**

Package	May 2025	Jun 2025	Jul 2025	Aug 2025	Sep 2025	Oct 2025
<b>North Package (M80RRA)</b>	EMF and EPR Compliance Audit	Env Perf <sup>2</sup> Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit
<b>South Package (EBTA)</b>	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit
<b>East Package (ETSA)</b>	-	-	-	Env Perf Audit	-	-
<b>West Package (EHBA)</b>	-	-	Env Perf Audit	-	-	-

#### 3.3.1 North Package (M80RRA) Compliance Audits

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

95 EPRs were relevant to the North Package activities during this Reporting Period. The FIEA Compliance Audit Program assessed compliance against 71 of these relevant EPRs during this Reporting Period. The EPRs assessed included those addressed by the WEMPs and CCPs assessed at a site-level during the monthly Environmental Performance Audits, and the Package-level EPRs included within the scope of the quarterly EMF and EPR Compliance Audits.

<sup>2</sup> Env Perf Audit refers to Environmental Performance Audit

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**Table 3.5 – Scope of North Package (M80RRA) Audits**

Month	Summary of scope
<b>May 2025</b>	<p><b>Quarterly EMF and EPR Compliance Audit:</b></p> <ul style="list-style-type: none"> <li>• EMF and EPRs assessed:               <ul style="list-style-type: none"> <li>• Environmental Management Framework EPRs EMF1 to EMF4, including following Environmental Strategy and CEMP components: Roles and Responsibilities; Environmental Management Documentation and Deliverables; and Compliance Monitoring and Assurance Auditing</li> <li>• Aboriginal Heritage EPR AH1;</li> <li>• Air Quality EPR AQ1;</li> <li>• Arboriculture EPRs AR1 to AR3;</li> <li>• Contamination and Soil EPRs CL1 to CL5;</li> <li>• Flora and Fauna EPRs FF1 to FF10;</li> <li>• Noise and Vibration EPRs NV3, NV4 and NV14;</li> <li>• Social and Community EPR SC3;</li> <li>• Surface Water EPRs SW1 to SW15; and</li> <li>• Traffic and Transport EPR T2;</li> </ul> </li> <li>• Assessed EMF requirement with respect to AS/NZS ISO 14001:2016 <i>Environmental management systems (EMS) – requirements with guidance for use (AS/NZS ISO 14001:2016)</i> certified-EMS as appropriate to the Contractor’s activities</li> <li>• Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s);</li> <li>• Review of complaints (EPRs EMF4 and SC3) and incidents;</li> <li>• Construction sites assessed – implementation of in-scope EPRs, WEMPs and CCPs (where applicable):               <ul style="list-style-type: none"> <li>• Zone 3100-3200.</li> </ul> </li> </ul>
<b>Jun 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>• <i>WEMP Zone 3500 – 3600 (Phase 2 &amp; 3)</i>, with site visits to Zone 3500-3600 (Southern Interface Zone), North East Elder Street , Northern Carpark, Southern Carpark and Southern Interface sub-area.</li> </ul>
<b>Jul 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>• <i>WEMP Zone 3300 – 3400 (Phases 2, 3 &amp; 4)</i>, with site visits to Zone 3300-3400 (South Zone) sub-areas, Area C and Area D</li> </ul>
<b>Aug 2025</b>	<p><b>Quarterly EMF and EPR Compliance Audit:</b></p> <ul style="list-style-type: none"> <li>• EMF and EPRs assessed:               <ul style="list-style-type: none"> <li>• Environmental Management Framework EPRs EMF2 to EMF4, including following Environmental Strategy and CEMP components: Strategic Approach and Management System Framework; Environmental Training, Awareness and Competencies; Consultation and Communications; and Reporting and Monitoring</li> </ul> </li> </ul>

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Month	Summary of scope
	<ul style="list-style-type: none"> <li>• Aboriginal Heritage EPR AH1;</li> <li>• Air Quality EPR AQ1;</li> <li>• Arboriculture EPRs EPR AR1 to AR2;</li> <li>• Business EPRs B1, B3 to B8;</li> <li>• Contamination and Soil EPRs CL1 to CL5;</li> <li>• Flora and Fauna EPRs FF1, FF3 and FF4;</li> <li>• Ground Movement EPRs GM1 to GM4;</li> <li>• Groundwater EPRs GW1 to GW4;</li> <li>• Noise and Vibration EPRs NV3, NV4 and NV8;</li> <li>• Social and Community EPRs SC1 to SC6;</li> <li>• Surface Water ERPs SW5, SW8 and SW10; and</li> <li>• Traffic and Transport EPRs T1 to T5</li> <li>• Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s);</li> <li>• Review of complaints (EPRs EMF4 and SC3) and incidents;</li> <li>• Construction sites assessed – implementation of in-scope EPRs, WEMPs and CCPs (where applicable):               <ul style="list-style-type: none"> <li>• Zone 3500-3600.</li> </ul> </li> </ul>
<b>Sep 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>• <i>WEMP - Zone 3300-3400 (Phases 2, 3 &amp; 4), WEMP - AK Lines Site Compound and AK Lines Compound CCP, with site visits to Zone 3300-3400 (South Zone) – sub-areas Area A and Area B; and AK Lines Construction Compound.</i></li> </ul>
<b>Oct 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>• <i>WEMP - Zone 3100-3200 (Phases 2, 3 &amp; 4), with site visits to Zone 3100 – 3200 (North Zone) - sub-areas Area C, Area E and Area F</i></li> </ul>

For the purposes of assessing compliance with all relevant EPRs at least once every 12 months for the North Package, the initial 12 months of the North Package Compliance Audit Program was considered to have commenced from February of each year, as of the first quarterly EMF and EPR Compliance Audit conducted in February 2024. Consequently, the FIEA is scheduled to have assessed all relevant EPRs for the North Package for the second year of reporting, at a Package-level, by the end of January 2026 (in practice, to be completed in the quarterly EMF and EPR Compliance Audit scheduled for November 2025, which will be included within the next Reporting Period (i.e., November 2025 to April 2026).

### 3.3.2 South Package (EBTA) Compliance Audits

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

90 EPRs were relevant to the South Package during this Reporting Period. The FIEA Compliance Audit Program assessed compliance against 69 of these relevant EPRs during this Reporting Period. The EPRs assessed included those addressed at a site-level by the WEMPs and CCPs assessed during the monthly Environmental Performance Audit, and the Package-level EPRs included within the scope of the quarterly EMF and EPR Compliance Audit.

**Table 3.6 – Scope of South Package (EBTA) Audits**

Month	Summary of scope
<b>May 2025</b>	<p><b>Quarterly EMF and EPR Compliance Audit:</b></p> <ul style="list-style-type: none"> <li>• EMF and EPRs assessed:               <ul style="list-style-type: none"> <li>• Environmental Management Framework EPRs EMF1 to EMF4, including following Environmental Strategy and CEMP components: Environmental Management and Operational Control; and Review Improvement, and Documentation;</li> <li>• Aboriginal Heritage EPR AH1</li> <li>• Air Quality EPRs AQ1;</li> <li>• Arboriculture EPRs AR1 to AR3;</li> <li>• Contamination and Soil EPRs CL1 to CL5;</li> <li>• Flora and Fauna EPRs FF1 to FF5;</li> <li>• Groundwater EPRs GW1 to GW4;</li> <li>• Historic Heritage EPRs HH1 to HH2 and HH4 to HH5;</li> <li>• Noise and Vibration EPRs NV3, NV4, NV8 and NV9;</li> <li>• Social and Community EPR SC1;</li> <li>• Surface Water EPRs SW1 to SW5;</li> <li>• Sustainability and Climate Change EPRs SCC1, SCC2, SCC4 and SCC5;</li> </ul> </li> <li>• Assessed EMF requirement with respect to AS/NZS ISO 14001:2016 <i>Environmental management systems (EMS) – requirements with guidance for use</i> (AS/NZS ISO 14001:2016) certified-EMS as appropriate to the Contractor’s activities</li> <li>• Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s);</li> <li>• Review of complaints (EPRs EMF4 and SC3) and incidents;</li> <li>• Construction sites assessed - implementation of in-scope EPRs, WEMPs and CCPs (where applicable):               <ul style="list-style-type: none"> <li>• Zone 5100 – Bulleen Interchange.</li> </ul> </li> </ul>
<b>Jun 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>• <i>WEMP Zone: 5600 Valda Wetlands and CCP Elgar Park</i>, with site visits to Valda Wetlands and Elgar Park Compound worksites.</li> </ul>
<b>Jul 2025</b>	<p><b>Monthly Environmental Performance Audit</b> assessed implementation of:</p>

Month	Summary of scope
	<ul style="list-style-type: none"> <li>WEMP Zone: 5200 Mainline West and CCP Koonung Creek Reserve, with site visits to W80 – 5200 Inbound (Bourke to Bulleen Road) and E11 – 5200 Outbound (Bourke to Bulleen Road) worksites.</li> </ul>
<b>Aug 2025</b>	<p><b>Quarterly EMF and EPR Compliance Audit:</b></p> <ul style="list-style-type: none"> <li>EMF and EPRs assessed:           <ul style="list-style-type: none"> <li>Environmental Management Framework EPRs EMF1 to EMF4, including the following Environmental Strategy and CEMP components: Policy and Objectives; and Legal and other requirements;</li> <li>Aboriginal Heritage EPR AH1;</li> <li>Air Quality EPRs AQ1 and AQ6;</li> <li>Arboriculture EPRs AR1 and AR2;</li> <li>Business EPRs B1 and B4 to B8;</li> <li>Contamination and Soil EPRs CL1, CL2 and CL5;</li> <li>Flora and Fauna EPRs FF1 to FF3 and FF5;</li> <li>Ground Movement EPRs GM1 to GM4;</li> <li>Ground Water EPRs GW3 and GW4;</li> <li>Historic Heritage EPR HH1;</li> <li>Noise and Vibration EPRs NV3, NV4, NV8 and NV9;</li> <li>Social and Community EPRs SC1 to SC6;</li> <li>Surface Water EPRs SW1, SW2 and SW5 to SW7; and</li> <li>Sustainability and Climate Change EPRs SCC1, SCC2, SCC4 and SCC5.</li> </ul> </li> <li>Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s);</li> <li>Review of complaints (EPRs EMF4 and SC3) and incidents;</li> <li>Construction sites assessed - implementation of in-scope EPRs, WEMPs and CCPs (where applicable):           <ul style="list-style-type: none"> <li>Zone 5100 – Bulleen Interchange;</li> <li>Zone 5300 – Estelle Street Compound; and,</li> <li>Zone 5500 –Doncaster Park and Ride.</li> </ul> </li> </ul>
<b>Sep 2025</b>	<p><b>Monthly Environment Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>WEMP Zone: 5300 &amp; 5400 Mainline East and CCP Zone: 5500 Doncaster Park and Ride Compound, with site visit to Zone: 5300 &amp; 5400 Mainline East Overpass.</li> </ul>
<b>Oct 2025</b>	<p><b>Monthly Environment Performance Audit</b> assessed implementation of:</p> <ul style="list-style-type: none"> <li>WEMP – Doncaster PRS; and WEMP – Presbyterian Theological College Temporary Site with site visits to Doncaster PRS Zone: 5500 and Presbyterian Theological College Temporary Site Zone: 5400.</li> </ul>

For the purposes of assessing compliance with all relevant EPRs at least once every 12 months for the South Package, the initial 12 months of the South Package Compliance Audit Program was considered to have commenced from February of each year, as of the first quarterly EMF and EPR Compliance Audit conducted in February 2024. Consequently, the FIEA is scheduled to have assessed all relevant EPRs for the North Package for the second year of reporting, at a Package-level, by the end of January 2026 (in practice, to be completed in the quarterly EMF and EPR Compliance Audit scheduled for November 2025, which will be included within the next Reporting Period (i.e., November 2025 to April 2026).

### 3.3.3 East Package Compliance Audits

The scope of the Compliance Audits conducted on the East Package during this Reporting Period is summarised in Table 3.7.

The full FIEA Compliance Audit Program did not commence during this Reporting Period as East Package construction activities only commenced in October 2025. The full FIEA Compliance Audit Program is due to commence 3-months after construction commencement and will be included within the next Reporting Period.

East Package early works, comprising site investigations, were undertaken by ETSA during this Reporting Period. Consequently, a single monthly Environment Performance Audit, assessing EPRs addressed at a site-level by the WEMP covering ETSA early works, was completed during this Reporting Period. 93 EPRs were relevant to the East Package during this Reporting Period, with the single audit conducted assessing compliance against 30 of these relevant EPRs.

**Table 3.7 – Scope of East Package (ETSA) Audits**

Month	Summary of scope
May 2025	No audit conducted.
Jun 2025	No audit conducted.
Jul 2025	No audit conducted.
Aug 2025	<b>Monthly Environment Performance Audit</b> assessed implementation of: <i>WEMP Zone: 6900 Project Wide</i> , with site visits to Zone 6100, 6200 and 6300 pertaining to project wide site investigation activities.
Sep 2025	No audit conducted.
Oct 2025	No audit conducted.

### 3.3.4 West Package Compliance Audits

The scope of the Compliance Audits conducted on the West Package during this Reporting Period is summarised in Table 3.8.

The full FIEA Compliance Audit Program did not commence during this Reporting Period as West Package construction activities only commenced in October 2025. The full FIEA Compliance Audit Program is due to commence three (3) months after construction commencement and will be included within the next Reporting Period.

West Package early works, comprising site investigations, were undertaken by EHBA during this Reporting Period. Consequently, a single monthly Environment Performance Audit, assessing EPRs addressed at a site-level by the WEMP covering EHBA site investigations, was completed during this Reporting Period. 101 EPRs were relevant to the West Package during this Reporting Period, with the single audit conducted assessing compliance against 53 of these relevant EPRs.

**Table 3.8 – Scope of West Package (EHBA) Audits**

Month	Summary of scope
May 2025	No audit conducted.
Jun 2025	No audit conducted.
Jul 2025	<b>Monthly Environment Performance Audit</b> assessed implementation of: <i>WEMP Site Investigation Works</i> , with site visits to Zone 4100 and 4200 pertaining to project wide site investigation activities.
Aug 2025	No audit conducted.
Sep 2025	No audit conducted.
Oct 2025	No audit conducted.

### 3.3.5 Other FIEA Compliance Audits

#### 3.3.5.1 Project-wide EPRs (VIDA Roads)

No further compliance audits were conducted during this reporting period.

Whilst the FIEA is responsible for assessing VIDA Roads’ compliance with a number of Project-wide EPRs, no Project-wide EPR Compliance Audit was conducted by the FIEA during this Reporting Period (Note: a Project-wide EPR Compliance Audit was conducted by the FIEA in November 2024, with the next audit scheduled for November 2025).

## 4. Audit Findings and Corrective Actions

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

### 4.1 North Package

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

**Table 4.1 – North Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Non-Compliance</b>	0	7	6	1
<b>Area for Improvement (AFI)</b>	4	14	15	3
<b>Observation</b>	2	13	12	3
<b>Total</b>	<b>6</b>	<b>34</b>	<b>33</b>	<b>7</b>

A total of 34 audit findings were raised during this Reporting Period, comprising seven (7) Non-compliances, 14 AFIs and 13 Observations. Four (4) AFIs and two (2) Observation findings remained open at the beginning of this Reporting Period from the previous Reporting Period (i.e., November 2024 to April 2025).

During this Reporting Period, corrective actions undertaken by M80RRA resulted in the closure of six (6) Non-compliances, 15 AFIs and 12 Observations.

All four (4) AFIs that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2024 to April 2025) were closed during this Reporting Period. In total, one (1) Non-compliance, three (3) AFIs and three (3) Observations remained open at the end of this Reporting Period, which is inclusive of the two (2) Observations that were open at the beginning of this Reporting Period. Corrective actions, where undertaken by the M80RRA, to address the findings that remained open at the end of this Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).



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

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

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>EMF and EMF EPRs</b>	<ul style="list-style-type: none"> <li>• Environmental Strategy</li> <li>• CEMP</li> <li>• EPRs EMF1 to EMF4</li> </ul>	<b>Compliant</b>	-
<b>Aboriginal Heritage</b>	<ul style="list-style-type: none"> <li>• EPR AH1</li> </ul>	<b>Compliant</b>	-
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• EPRs AQ1 and AQ6</li> </ul>	<b>Compliant</b> , but with the following findings: <ul style="list-style-type: none"> <li>• EPR AQ1 –               <ul style="list-style-type: none"> <li>• One (1) Observation raised during this Reporting Period; and,</li> <li>• Two (2) Observations remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The one (1) Observation finding raised against EPR AQ1 during this reporting Period was closed.</li> <li>• The two (2) Observation findings raised against EPR AQ1 that were open at the beginning of this Reporting Period remained open.</li> </ul>



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>EPRs AR1 to AR3</li> </ul>	<p><b>Compliant</b> - EPRs AR1 and AR3, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR AR1 - one (1) Observation raised during this Reporting Period.</li> </ul> <p><b>Non-compliant</b> - EPR AR2:</p> <ul style="list-style-type: none"> <li>Findings raised during this Reporting Period               <ul style="list-style-type: none"> <li>Two (2) Non-compliances; and,</li> <li>One (1) AFI.</li> </ul> </li> <li>Findings remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI.</li> </ul> </li> </ul>	<p>All findings under 'Compliance Status', including the two (2) Non-compliances against EPR AR2, were closed.</p>
<b>Business</b>	<ul style="list-style-type: none"> <li>EPRs B1 and B3 to B8</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR B1 - findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI; and,</li> <li>Two (2) Observations.</li> </ul> </li> </ul>	<p>All findings under 'Compliance Status' were closed.</p>
<b>Contamination and Soil</b>	<ul style="list-style-type: none"> <li>EPRs CL1 to CL5</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR CL1 - one (1) AFI raised during this Reporting Period.</li> <li>EPR CL5 - one (1) AFI remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period.</li> </ul>	<p>All findings under 'Compliance Status' were closed.</p>



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Flora and Fauna</b>	<ul style="list-style-type: none"> <li>EPRs FF1 to FF10</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR FF1 - findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> <li>EPR FF3 –               <ul style="list-style-type: none"> <li>One (1) AFI raised during this Reporting Period; and,</li> <li>One (1) AFI remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The one (1) AFI raised against EPR FF3 during this Reporting Period remained open.</li> <li>All other findings under 'Compliance Status' were closed.</li> </ul>
<b>Ground Movement</b>	<ul style="list-style-type: none"> <li>EPRs GM1 to GM4</li> </ul>	<b>Compliant</b>	-
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>EPRs GW1 to GW4</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR GW4 - two (2) AFIs raised during this Reporting Period.</li> </ul>	All findings under 'Compliance Status' were closed.
<b>Historical Heritage</b>	Not assessed during Reporting Period		
<b>Land Use Planning</b>	Not assessed during Reporting Period		
<b>Landscape and Visual</b>	Not assessed during Reporting Period		



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>EPRs NV3, NV4, NV8, NV13 and NV14</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR NV3 - one (1) Observation raised during this Reporting Period,</li> <li>EPR NV4 – findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> <li>EPR NV13 –               <ul style="list-style-type: none"> <li>One (1) Observation raised during this Reporting Period; and,</li> <li>One (1) AFI remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period.</li> </ul> </li> </ul>	<p>All findings under ‘Compliance Status’ were closed.</p>
<b>Social and Community</b>	<ul style="list-style-type: none"> <li>EPRs SC1 to SC6</li> </ul>	<p><b>Compliant</b> - EPRs SC1, SC2, SC4, SC5 and SC6.</p> <p><b>Non-compliant</b> –</p> <ul style="list-style-type: none"> <li>EPR SC3 - findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) Non-compliance.</li> <li>One (1) AFI.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The one (1) Non-compliance finding raised against EPR SC3 during this Reporting Period remained open.</li> <li>The one (1) AFI raised against EPR SC3 during this Reporting Period was closed.</li> </ul>



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>EPRs SW1 to SW15</li> </ul>	<p><b>Compliant</b> - EPRs SW1 to SW3 and SW6 to SW15.</p> <p><b>Non-compliant</b> -</p> <ul style="list-style-type: none"> <li>EPR SW4 – findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) Non-compliance;</li> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> <li>EPR SW5 – findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>Three (3) Non-compliances;</li> <li>Three (3) AFIs; and,</li> <li>One (1) Observation.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Two (2) of the AFIs and the one (1) Observation raised against EPR SW5 during this Reporting Period remained open.</li> <li>All other findings under ‘Compliance Status’, including the four (4) Non-compliance findings, were closed.</li> </ul>
<b>Sustainability and Climate Change</b>	Not assessed during Reporting Period		
<b>Traffic and Transport</b>	<ul style="list-style-type: none"> <li>EPRs T1 to T5</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPRs T1, T3 and T4 to T5 – Compliant</li> <li>EPR T2 – Compliant, with one (1) AFI and three (3) Observations raised during this Reporting Period.</li> </ul>	All findings under ‘Compliance Status’ were closed.

North Package (M80RRA) construction activities were considered to be Compliant with 67 of the 71 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, Non-compliance findings were raised against the remaining four (4) EPRs namely Arboriculture EPR AR2, Social and Community EPR SC3, and Surface Water EPRs SW4 and SW5. Summaries of the Non-compliance findings identified during this Reporting Period are provided in Table 4.3.

**Table 4.3: North Package Non-compliance findings**

EPR Topic	Non-compliance Findings	Close-out Status
<b>Arboriculture EPR AR2</b>	<ul style="list-style-type: none"> <li>The FIEA observed root damage to tree ATS-212, incomplete arborist inspection and tree root cutting located outside the area inspected and reported on by the project Arborist which had been did not meet AS4970-2009, which did not meet requirements of Australian Standard AS4970-2009 pertaining to the observed root damage to tree ATS-212. <i>(Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</i></li> </ul>	• Closed
<b>Arboriculture EPR AR2</b>	<ul style="list-style-type: none"> <li>Insufficient evidence to support that M80RRA had satisfied the watering recommendations in the Arborist memo insofar as it relates to Tree #13621 <i>(Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</i></li> </ul>	• Closed
<b>Social and Community EPR SC3</b>	<ul style="list-style-type: none"> <li>M80RRA was unable to provide evidence of consultation regarding safety requirements and evacuation procedures to the FIEA insofar as it related to local schools in ascertaining safety requirements (including evacuation procedures). <i>(Note: identified during the EMF and EPR Compliance Audit conducted in August 2025).</i></li> </ul>	• Open
<b>Surface Water EPR SW4</b>	<ul style="list-style-type: none"> <li>The FIEA observed that the M80 RRA monthly water monitoring reports did not meet the requirements set out in the Surface Water Management Plan (SWMP) as the appropriate criteria of 10% and 20% difference between upstream and downstream sampling locations was not applied, as specified, to determine whether further investigations were required. <i>(Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</i></li> </ul>	• Closed
<b>Surface Water EPR SW5</b>	<ul style="list-style-type: none"> <li>The FIEA observed a recently established site access point for Area A (Zone 3100-3200) with no rumble grid or foreign object debris (FOD) mats in place, and that solid mud and soil had been tracked out onto the public road. The FIEA was advised that FOD mats were being sourced and were scheduled to be installed on the day of the audit. <i>(Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</i></li> </ul>	• Closed

EPR Topic	Non-compliance Findings	Close-out Status
Surface Water EPR SW5	<ul style="list-style-type: none"> <li>The FIEA observed an unmarked and unapproved Chemical Storage Area within the Zone 3100-3200 WEMP that had been established by subcontractors within Area A of Zone 3100-3200 in contravention of the site Environmental Control Plan (ECP). (Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</li> </ul>	• Closed
Surface Water EPR SW5	<ul style="list-style-type: none"> <li>The FIEA noted that there was no inclusion, within the Permit to Release Water, of electrical conductivity (EC) versus maximum discharge scenarios determined in line with the risk-based approach outlined in Appendix C of the SWMP. In addition, no reference was made to undertaking downstream monitoring locations and monitoring frequencies to be employed during discharge events. (Note: identified during the EMF and EPR Compliance Audit conducted in September 2025).</li> </ul>	• Closed

Six (6) of the seven (7) Non-compliance findings were closed during this Reporting Period, with the Non-compliance finding against Social and Community EPR SC3, which was identified during this Reporting Period, remaining open.

No Non-compliance findings from previous Reporting Periods remained open at the beginning of this Reporting Period.

## 4.2 South Package

The findings raised during the FIEA Compliance Audit Program conducted on the South Package (EBTA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table 4.4.

**Table 4.4 – South Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	5	6	7	4
Area for Improvement (AFI)	7	24	18	13
Observation	5	7	7	5



Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Total</b>	<b>17</b>	<b>37</b>	<b>32</b>	<b>22</b>

A total of 37 audit findings were raised during this Reporting Period, comprising six (6) Non-compliances, 24 AFIs and seven (7) Observations. Five (5) Non-compliance findings, seven (7) AFIs and five (5) Observation findings remained open at the beginning of this Reporting Period from the previous Reporting Period (i.e., November 2024 to April 2025).

During this Reporting Period, corrective actions undertaken by EBTA resulted in the closure of seven (7) Non-compliances, 17 AFIs and seven (7) Observations.

Sixteen (16) of the 17 findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2024 – April 2025)) were subsequently closed during this Reporting Period. The finding that remained open at both the beginning and the end of this Reporting Period comprised one (1) Non-compliance against EPR NV4.

In total, four (4) Non-compliances, 13 AFIs and five (5) Observations remained open at the end of this Reporting Period. Corrective actions, where undertaken by EBTA, to address the findings that remain open at the end of this Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).

This Reporting Period’s audit findings with respect to the compliance status of Program activities and the close out of those findings against the EMF and EPRs assessed during this Reporting Period are summarised in Table 4.5.

**Table 4.5: Compliance status of South Package activities with EMF and EPRs audited during Reporting Period**

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>EMF and EMF EPRs</b>	<ul style="list-style-type: none"> <li>• Environmental Strategy</li> <li>• CEMP</li> <li>• EPRs EMF1 to EMF4</li> </ul>	<p><b>Compliant</b> - EPRs EMF1 to EMF4, but with the following findings raised during this Reporting Period:</p> <ul style="list-style-type: none"> <li>• EPR EMF1 –               <ul style="list-style-type: none"> <li>• One (1) AFI.</li> <li>• One (1) Observation</li> </ul> </li> <li>• EPR EMF2 – One (1) AFI</li> </ul> <p><b>Non-compliant</b> – EMF2 findings remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:</p> <ul style="list-style-type: none"> <li>• Two (2) Non-compliance findings;</li> <li>• Three (3) AFIs; and,</li> <li>• Two (2) Observations.</li> </ul>	<p>The one (1) Observation raised against EPR EMF1 during this Reporting Period remained open.</p> <p>All other findings under ‘Compliance Status’, including the two (2) Non-compliances against EPR EMF2 that remained open from the previous Reporting Period, were closed.</p>
<b>Aboriginal Heritage</b>	<ul style="list-style-type: none"> <li>• EPR AH1</li> </ul>	<b>Compliant</b>	-
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• EPRs AQ1 and AQ6</li> </ul>	<p><b>Compliant</b>, but with the following findings raised against EPR AQ1, which remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:</p> <ul style="list-style-type: none"> <li>• One (1) AFI; and,</li> <li>• One (1) Observation.</li> </ul>	All findings under ‘Compliance Status’ were closed.

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>EPRs AR1 to AR3</li> </ul>	<p><b>Compliant</b> – EPRs AR1, AR2 and AR3 during this Reporting Period.</p> <p><b>Non-compliant</b> – EPR AR2 finding remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:</p> <ul style="list-style-type: none"> <li>One (1) Non-compliance.</li> </ul>	<p>The Non-compliance finding against EPR AR2 that remained open at the beginning of this Reporting Period was closed.</p>
<b>Business</b>	<ul style="list-style-type: none"> <li>EPRs B1 and B4 to B8</li> </ul>	<p><b>Compliant</b>, but with the following findings:</p> <ul style="list-style-type: none"> <li>EPR B1 – findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> </ul>	<p>Both the one (1) AFI and the one (1) Observation raised against EPR B1 during this Reporting Period remained open.</p>
<b>Contamination and Soil</b>	<ul style="list-style-type: none"> <li>EPRs CL1 to CL5</li> </ul>	<p><b>Compliant</b> - EPRs CL2, CL3 and CL4.</p> <p><b>Non-compliant</b> -</p> <ul style="list-style-type: none"> <li>EPR CL1 – Findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>Two (2) Non-compliances;</li> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> <li>EPR CL5 –               <ul style="list-style-type: none"> <li>Findings raised during this Reporting Period:                   <ul style="list-style-type: none"> <li>One (1) Non-compliance;</li> <li>Seven (7) AFIs.</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The following findings raised during this Reporting Period remained open:               <ul style="list-style-type: none"> <li>EPR CL1:                   <ul style="list-style-type: none"> <li>One (1) Non-compliance; and,</li> <li>One (1) Observation.</li> </ul> </li> <li>EPR CL5:                   <ul style="list-style-type: none"> <li>One (1) Non-compliance; and</li> <li>One (1) AFI.</li> </ul> </li> </ul> </li> <li>All other findings under ‘Compliance Status’, including one (1) of the Non-compliances against EPR CL1 raised during this Reporting Period and the Non-</li> </ul>



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
		<ul style="list-style-type: none"> <li>remained open from previous Reporting Period(s);</li> <li>One (1) Non-compliance finding (from November 2024 to April 2025); and,</li> <li>One (1) AFI (from May 2024 to October 2024).</li> </ul>	compliance against EPR CL5 which remained open from the previous Reporting Period, were closed.
<b>Flora and Fauna</b>	<ul style="list-style-type: none"> <li>EPRs FF1 to FF5, FF8 to FF10</li> </ul>	<b>Compliant</b> , but with the following finding: <ul style="list-style-type: none"> <li>EPR FF3 - remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) Observation.</li> </ul> </li> </ul>	The one (1) Observation under ‘Compliance Status’ was closed.
<b>Ground Movement</b>	<ul style="list-style-type: none"> <li>EPRs GM1 to GM4</li> </ul>	<b>Compliant</b>	-
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>EPRs GW1 to GW4</li> </ul>	<b>Compliant</b>	-
<b>Historical Heritage</b>	<ul style="list-style-type: none"> <li>EPR HH1 to HH2 and HH4 to HH5</li> </ul>	<b>Compliant</b>	-
<b>Land Use Planning</b>	Not assessed during Reporting Period		
<b>Landscape and Visual</b>	Not assessed during Reporting Period		



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>EPRs NV3, NV4, NV8 and NV9</li> </ul>	<p><b>Compliant</b> – EPRs NV3, NV4, NV8 and NV9 during this Reporting Period, but with the following:</p> <ul style="list-style-type: none"> <li>EPR NV3 – one (1) Observation raised during this Reporting Period.</li> </ul> <p><b>Non-compliant</b> – EPR NV4 finding remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:</p> <ul style="list-style-type: none"> <li>One (1) Non-compliance.</li> </ul>	<ul style="list-style-type: none"> <li>The one (1) Observation raised against EPR NV3 during this Reporting Period was closed.</li> <li>The Non-compliance finding against EPR NV4 which remained open at the beginning of this Reporting Period remained open.</li> </ul>
<b>Social and Community</b>	<ul style="list-style-type: none"> <li>EPRs SC1 to SC6</li> </ul>	<p><b>Compliant</b> - EPRs SC1, SC2, SC4, SC5 and SC6</p> <p><b>Non-compliant</b> - EPR SC3:</p> <ul style="list-style-type: none"> <li>Findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) Non-compliance;</li> <li>Two (2) AFIs; and,</li> <li>Two (2) Observations.</li> </ul> </li> <li>Findings remained open from the previous Reporting Period (i.e., November 2024 to April 2025) at the beginning of this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI; and,</li> <li>One (1) Observation.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The two (2) AFIs and two (2) Observations raised against EPR SC3 during this Reporting Period remained open.</li> <li>All other findings under ‘Compliance Status’, including the Non-compliance finding raised against EPR SC3, were closed.</li> </ul>



EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>EPRs SW1 to SW15</li> </ul>	<p><b>Compliant</b> - EPRs SW1 to SW4, but with the following finding:</p> <ul style="list-style-type: none"> <li>EPR SW1: One (1) AFI remained open from a previous Reporting Period (i.e., May 2024 to October 2024) at the beginning of this Reporting Period.</li> </ul> <p><b>Non-compliant</b> - EPR SW5 findings raised during this Reporting Period:</p> <ul style="list-style-type: none"> <li>Two (2) Non-compliances;</li> <li>Eleven (11) AFIs; and,</li> <li>One (1) Observation.</li> </ul>	<ul style="list-style-type: none"> <li>One (1) Non-compliance finding and nine (9) AFIs raised against EPR SW5 during this Reporting Period remained open.</li> <li>All other findings under 'Compliance Status', including the one (1) Non-compliance raised against EPR SC3, were closed.</li> </ul>
<b>Sustainability and Climate Change</b>	<ul style="list-style-type: none"> <li>EPRs SCC1 to SCC2 and SCC4 to SCC5</li> </ul>	<b>Compliant</b>	-
<b>Traffic and Transport</b>	Not assessed during Reporting Period		

The South Package (EBTA) activities were considered to be compliant with 65 of the 69 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, six (6) Non-compliance findings were raised against four (4) EPRs namely: Contamination and Soil EPRs CL1 and CL5; Social and Community EPR SC3; and, Surface Water EPR SW5. Summaries of the Non-compliance findings identified during this Reporting Period are provided in Table 4.6.

**Table 4.6: South Package Non-compliance findings identified during this Reporting Period**

EPR Topic	Non-compliance Findings	Close-out Status
<b>Contamination and Soil EPR CL1</b>	<ul style="list-style-type: none"> <li>The FIEA observed pre-piling works which involved disturbance of asbestos at the Bulleen Interchange worksite and whilst site personnel were wearing appropriate personal protective equipment (PPE), the same personnel were observed removing masks to talk whilst within the defined asbestos works zone with ongoing drilling works that is not compliant with the requirements to appropriately store and handle of hazardous materials under EPRs CL1 and CL5. (Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Contamination and Soil EPR CL1</b>	<ul style="list-style-type: none"> <li>The FIEA observed a truck exiting the Bulleen Interchange worksite with an uncovered load of mudstone/spoil/rock and with this material along the edge of the truck bin, with a visual check of the truck and load not having been performed effectively. (Note: identified during the EMF and EPR Compliance Audit conducted in August 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Open</li> </ul>
<b>Contamination and Soil EPR CL5</b>	<ul style="list-style-type: none"> <li>At the work site at Bulleen Interchange, the FIEA observed full jerry cans containing AdBlue (a combustible product), which were not provided with secondary containment or bunding. (Note: identified during the EMF and EPR Compliance Audit conducted in August 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Open</li> </ul>
<b>Social and Community EPR SC3</b>	<ul style="list-style-type: none"> <li>Evidence of consultation regarding safety requirements and evacuation procedures relating to local schools was not available to the FIEA for review. (Note: identified during the EMF and EPR Compliance Audit conducted in August 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Surface Water EPR SW5</b>	<ul style="list-style-type: none"> <li>The FIEA observed ineffective implementation of rumble grids, which only covered approximately 50% of the ground, allowing vehicles to bypass the control and track out material onto the public roads. (Note: identified during the EMF and EPR Compliance Audit conducted in May 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Surface Water EPR SW5</b>	<ul style="list-style-type: none"> <li>During a site visit to the Bulleen Interchange worksite, no evidence of a documented risk assessment was made available to the FIEA insofar as it relates to the temporary relocation of a chemical storage container adjacent to the Koonung Creek. (Note: identified during the EMF and EPR Compliance Audit conducted in August 2025).</li> </ul>	<ul style="list-style-type: none"> <li>Open</li> </ul>

Whilst three (3) of the Non-compliance findings, including one (1) Non-compliance each against EPR CL1, EPR SC3 and EPR SW5, were closed during this Reporting Period, the remaining three (3) Non-compliance findings raised during this Reporting Period remained open. The Non-compliance findings which remained open were associated with EPRs CL1, CL5 and SW5.

In addition, five (5) Non-compliance findings identified during the previous Reporting Period (i.e., November 2024 to April 2025) remained open at the beginning of this Reporting Period and are summarised in Table 4.7.

**Table 4.7: South Package Non-compliance findings identified during the previous Reporting Period (i.e., November 2024 to April 2025) that remained open at the beginning of this Reporting Period**

EPR Topic	Non-compliance Findings	Close-out Status
<b>Environmental Management Framework EMF2</b>	<ul style="list-style-type: none"> <li>The environmental incident reporting process does not meet the intent of Section 7.3 of the EMF due to a lack of a formal FIEA notification process within key management plans (i.e., the CEMP and the Environmental Strategy). <i>(Note: identified during the EMF and EPR Compliance Audit conducted in November 2024).</i></li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Environmental Management Framework EMF2</b>	<ul style="list-style-type: none"> <li>The review of the Communications and Community Engagement Plan (CCEP) had not been undertaken in accordance with the review timing requirements outlined within the PRS and/or the Environment Strategy. <i>(Note: identified during the EMF and EPR Compliance Audit conducted in November 2024).</i></li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Arboriculture AR2</b>	<ul style="list-style-type: none"> <li>At a work site on the corner of High Street and Doncaster Road, a tree was partially delineated by Tree Protection Zone (TPZ) fencing along the surrounding footpath but not within the worksite area. The TPZ delineation did not surround all accessible points to the tree. <i>(Note: identified during the Environmental Performance Audit conducted in April 2025).</i></li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>
<b>Contamination and Soil CL5</b>	<ul style="list-style-type: none"> <li>Two (2) jerry cans, containing hazardous materials (mould oil and fuel), were observed without appropriate bunding on a worksite adjacent to the Doncaster Road Compound and between the inbound and outbound freeway roads. <i>(Note: identified during the Environmental Performance Audit conducted in April 2025).</i></li> </ul>	<ul style="list-style-type: none"> <li>Closed</li> </ul>

EPR Topic	Non-compliance Findings	Close-out Status
<b>Noise and Vibration NV4</b>	<ul style="list-style-type: none"> <li>The Construction Noise and Vibration Management Plan (Rev 0) review periods were not in accordance with the timing outlined against NV4, the Environment Strategy or the CEMP. Hence, the CNVMP was out of date at the time of the audit and did not reflect current activities and locations under EBTA control. <i>(Note: identified during the EMF and EPR Compliance Audit conducted in November 2024).</i></li> </ul>	<ul style="list-style-type: none"> <li>Open</li> </ul>

Four (4) Non-compliance findings that were open at the beginning of this Reporting Period, were closed during this Reporting Period. One (1) Non-compliance finding raised against EPR NV4 from the previous Reporting Period (i.e., November 2024 to April 2025) remained open at the end of this Reporting Period.

### 4.3 East Package

The findings raised during the FIEA Compliance Audit Program conducted on the East Package (ETSA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table 4.8.

**Table 4.8 – East Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Non-Compliance</b>	0	0	0	0
<b>Area for Improvement (AFI)</b>	0	3	0	3
<b>Observation</b>	0	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>

A total of three (3) audit findings were raised during this Reporting Period, comprising three (3) AFIs, which remained open at the end of this Reporting Period. Corrective actions, where undertaken by ETSA, to address the findings that remain open at the end of this Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).



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

**Table 4.9: Compliance status of East Package activities with EMF and EPRs audited during Reporting Period**

<b>EPR Topic</b>	<b>Relevant EMF and EPRs assessed</b>	<b>Compliance Status</b>	<b>Close-out Status at end of Reporting Period</b>
<b>EMF and EMF EPRs</b>	<ul style="list-style-type: none"> <li>EPRs EMF1 to EMF4</li> </ul>	<b>Compliant</b>	-
<b>Aboriginal Heritage</b>	<ul style="list-style-type: none"> <li>EPR AH1</li> </ul>	<b>Compliant</b>	-
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>EPRs AQ1, AQ4 and AQ6</li> </ul>	<b>Compliant</b>	-
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>EPRs AR1 to AR2</li> </ul>	<b>Compliant</b> - but with the following finding: <ul style="list-style-type: none"> <li>EPR AR2 – finding raised during this Reporting Period:               <ul style="list-style-type: none"> <li>One (1) AFI.</li> </ul> </li> </ul>	The one (1) AFI raised against EPR AR2 during this Reporting Period remained open.
<b>Business</b>	Not assessed during Reporting Period		
<b>Contamination and Soil</b>	<ul style="list-style-type: none"> <li>EPRs CL1 to CL6</li> </ul>	<b>Compliant</b> - but with the following findings: <ul style="list-style-type: none"> <li>EPR CL5 – findings raised during this Reporting Period:               <ul style="list-style-type: none"> <li>Two (2) AFIs.</li> </ul> </li> </ul>	The two (2) AFIs raised against EPR CL5 during this Reporting Period remained open.
<b>Flora and Fauna</b>	<ul style="list-style-type: none"> <li>EPRs FF1 to FF3 and FF8 to FF10</li> </ul>	<b>Compliant</b>	-
<b>Ground Movement</b>	Not assessed during Reporting Period		
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>EPR GW2</li> </ul>	<b>Compliant</b>	-
<b>Historical Heritage</b>	Not assessed during Reporting Period		

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<b>EPR Topic</b>	<b>Relevant EMF and EPRs assessed</b>	<b>Compliance Status</b>	<b>Close-out Status at end of Reporting Period</b>
<b>Land Use Planning</b>	Not assessed during Reporting Period		
<b>Landscape and Visual</b>	Not assessed during Reporting Period		
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>EPRs NV2 to NV4</li> </ul>	<b>Compliant</b>	-
<b>Social and Community</b>	<ul style="list-style-type: none"> <li>EPR SC3</li> </ul>	<b>Compliant</b>	-
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>EPRs SW1, SW4 to SW5, and SW7</li> </ul>	<b>Compliant</b>	-
<b>Sustainability and Climate Change</b>	Not assessed during Reporting Period		
<b>Traffic and Transport</b>	<ul style="list-style-type: none"> <li>EPR T2</li> </ul>	<b>Compliant</b>	-

The East Package (ETSA) activities were considered to be compliant with all 30 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

## 4.4 West Package

The findings raised during the FIEA Compliance Audit Program conducted on the West Package (EHBA) for this Reporting Period and the close out of those findings within this Reporting Period are summarised in Table 4.10.

**Table 4.10 – West Package Summary of Findings**

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
<b>Non-Compliance</b>	0	2	0	2
<b>Area for Improvement (AFI)</b>	0	6	0	6
<b>Observation</b>	0	0	0	0
<b>Total</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>8</b>

A total of eight (8) audit findings were raised during this Reporting Period, comprising two (2) Non-compliance findings and six (6) AFIs, which remained open at the end of this Reporting Period. Corrective actions, were undertaken by EHBA to address the findings that remained open at the end of this Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).

This Reporting Period’s audit findings with respect to the compliance status of Program activities and the close out of those findings against the EMF and EPRs assessed during this Reporting Period are summarised in Table 4.11.

**Table 4.11: Compliance status of West Package activities with EMF and EPRs audited during Reporting Period**

<b>EPR Topic</b>	<b>Relevant EMF and EPRs assessed</b>	<b>Compliance Status</b>	<b>Close-out Status at end of Reporting Period</b>
<b>EMF and EMF EPRs</b>	<ul style="list-style-type: none"> <li>EPRs EMF1 to EMF4</li> </ul>	<p><b>Compliant</b> - EPRs EMF1, EMF3 and EMF4</p> <p><b>Non-compliant</b> – EPR EMF2 – Findings raised during this Reporting Period:</p> <ul style="list-style-type: none"> <li>One (1) Non-compliance; and,</li> <li>One (1) AFI.</li> </ul>	The one (1) Non-compliance finding and one (1) AFI raised against EPR EMF2 during this Reporting Period remained open.
<b>Aboriginal Heritage</b>	<ul style="list-style-type: none"> <li>EPR AH1</li> </ul>	<b>Compliant</b>	-
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>EPRs AQ1, AQ4 and AQ6</li> </ul>	<b>Compliant</b>	-
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>EPRs AR1 to AR3</li> </ul>	<b>Compliant</b>	-
<b>Business</b>	<ul style="list-style-type: none"> <li>EPRs B1 to B8</li> </ul>	<b>Compliant</b>	-
<b>Contamination and Soil</b>	<ul style="list-style-type: none"> <li>EPRs CL1 to CL5</li> </ul>	<b>Compliant</b>	-
<b>Flora and Fauna</b>	<ul style="list-style-type: none"> <li>EPRs FF1 to FF10</li> </ul>	<p><b>Compliant</b> - EPRs FF1 to FF7, FF9 and FF10.</p> <p><b>Non-compliant</b> – EPR FF8 – Finding raised during this Reporting Period:</p> <ul style="list-style-type: none"> <li>One (1) Non-compliance.</li> </ul>	The one (1) Non-compliance finding raised against EPR FF8 during this Reporting Period remained open.

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EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
<b>Ground Movement</b>	Not assessed during Reporting Period		
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>EPR GW4</li> </ul>	<b>Compliant</b>	-
<b>Historical Heritage</b>	<ul style="list-style-type: none"> <li>EPRs HH3 to HH5</li> </ul>	<b>Compliant</b>	-
<b>Land Use Planning</b>	Not assessed during Reporting Period		
<b>Landscape and Visual</b>	<ul style="list-style-type: none"> <li>EPRs LV2 and LV3</li> </ul>	<b>Compliant</b> - but with the following findings: <ul style="list-style-type: none"> <li>EPR LV2 – One (1) AFI raised during this Reporting Period.</li> </ul>	The one (1) AFI raised against EPR LV2 during this Reporting Period remained open.
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>EPRs NV1 to NV5, NV8 to NV10 and NV15</li> </ul>	<b>Compliant</b> - but with the following findings: <ul style="list-style-type: none"> <li>EPR NV4 – Three (3) AFIs raised during this Reporting Period.</li> </ul>	The three (3) AFIs raised against EPR NV4 during this Reporting Period remained open.
<b>Social and Community</b>	<ul style="list-style-type: none"> <li>EPR SC1, SC2 and SC6</li> </ul>	<b>Compliant</b>	-
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>EPR SW4</li> </ul>	<b>Compliant</b> - but with the following findings: <ul style="list-style-type: none"> <li>EPR SW4 – One (1) AFI raised during this Reporting Period.</li> </ul>	The one (1) AFI raised against EPR SW4 during this Reporting Period remained open.
<b>Sustainability and Climate Change</b>	Not assessed during Reporting Period		
<b>Traffic and Transport</b>	Not assessed during Reporting Period		

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The West Package (EHBA) activities were considered to be compliant with 51 of the 53 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, Non-compliance findings were raised against the remaining two (2) EPRs namely Environmental Management EPR EMF2 and Flora and Fauna EPR FF8. Summaries of the Non-compliance findings identified during this Reporting Period are provided in Table 4.3.

**Table 4.12: West Package Non-compliance findings**

EPR Topic	Non-compliance Findings	Close-out Status
<b>Environmental Management Framework EMF2</b>	The WEMP – Site Investigations has not included information on the outcomes and recommendations from site-specific arboricultural and ecological assessments, which had progressed since the initial verification of the WEMP ( <i>Note: identified during the Environmental Performance Compliance Audit conducted in July 2025</i> ).	• Open
<b>Flora and Fauna FF8</b>	Consideration of the potential sensitive fauna present in the area and associated implementation of environmental controls to minimise noise and vibration impacts in areas near sensitive ecological receptors, as required by EPR FF8, was not documented within the pre-start checklists and site diary entries. ( <i>Note: identified during the Monthly Environmental Performance Compliance Audit conducted in July 2025</i> ).	• Open

The Non-compliance findings were not closed during this Reporting Period, with both remaining open.

## 4.5 Other FIEA Compliance Audits

### 4.5.1 Project-wide EPRs (VIDA Roads)

A Project-wide EPR Compliance Audit was not conducted during this Reporting Period.

The FIEA notes that the closure of the three (3) AFIs and the Observation, which remained open at the end of the previous Reporting Period (i.e., November 2024 to April 2025), will be assessed by the FIEA during the next Reporting Period (i.e., November 2025 to April 2025).

## 5. Overall Compliance

### 5.1 North Package

The FIEA audited 71 of the 95 EPRs relevant to the North Package (M80RRA) activities during this Reporting Period across six (6) compliance audits.

North Package (M80RRA) construction activities were considered to be compliant with 67 of the 71 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

During this Reporting Period, seven (7) Non-compliance findings were raised against the following four (4) EPRs: Arboriculture EPR AR2; Social and Community EPR SC3; and, Surface Water EPRs SW4 and SW5. No Non-compliance findings were open at the beginning of this Reporting Period from the previous Reporting Period (November 2024 to April 2025).

In total, six (6) of the seven (7) Non-compliance findings that were raised during this Reporting Period were closed. The one (1) Non-compliance finding that remained open at the end of this Reporting Period was related to Social and Community EPR SC3.

Additionally, 14 AFIs were raised against the following 11 EPRs during this Reporting Period: one (1) each related to Arboriculture EPR AR2, Business EPR B1, Contamination and Soil EPR CL1, Flora and Fauna EPR FF1, Flora and Fauna EPR FF3, Noise and Vibration EPR NV4, Social and Community EPR SC3, Surface Water EPR SW4 and Traffic & Transport EPR T2; two (2) related to Groundwater EPR GW4; and, three (3) related to Surface Water EPR SW5.

Four (4) AFIs were open at the end of the previous Reporting Period (November 2024 to April 2025), which were associated with four (4) EPRs: Arboriculture EPR AR2; Contamination and Soil EPR CL5; Flora and Fauna EPR FF3; and, Noise and Vibration EPR NV13.

A total of 15 AFIs were closed during this Reporting Period. This included all four (4) AFIs that were open at the end of the previous Reporting Period (November 2024 to April 2025) and 11 of the 14 AFIs that were raised during this Reporting Period. The three (3) AFIs that remained open at the end of this Reporting Period included: one (1) AFI that was related to Flora and Fauna EPR FF3; and, two (2) AFIs that were related to Surface Water EPR SW5.

Furthermore, a total of 13 Observations were raised against the following 10 EPRs: one (1) each related to Arboriculture EPR AR1; Flora and Fauna EPR FF1, Air Quality EPR AQ1, Surface Water EPR SW4, Noise and Vibration EPR NV3, Noise and Vibration EPR NV4, Noise and Vibration EPR NV13 and Surface Water EPR SW5; two (2) related to Business EPR B1; and, three (3) related to Traffic & Transport EPR T2.

The FIEA notes that two (2) Observations were open at the end of the previous Reporting Period (November 2024 to April 2025), which were associated with Air Quality EPR AQ1.

A total of 12 Observations were closed during this Reporting Period, which were all raised during this Reporting Period. The three (3) Observations that remained open at the end of this Reporting Period included the two (2) Observations related to Air Quality EPR AQ1 that were

open at the beginning of this Reporting Period and one (1) Observation related to Surface Water EPR SW5, which was identified during this Reporting Period.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

## **5.2 South Package**

The FIEA audited 69 of the 90 EPRs relevant to the South Package (EBTA) activities during this Reporting Period across six (6) compliance audits.

South Package (EBTA) construction activities were considered to be compliant with 65 of the 69 EPRs audited within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period.

During this Reporting Period, six (6) Non-compliance findings were raised against the following four (4) EPRs: two (2) each related to Contamination and Soil EPR CL1 and Surface Water EPR SW5; and, one (1) each related to Contamination and Soil EPR CL5 and Social and Community EPR SC3. The FIEA noted that five (5) Non-compliance findings were open at the end of the previous Reporting Period (November 2024 to April 2025), which were associated with three (3) EPRs: Two (2) related to Environmental Management Framework EPR EMF2; and, one (1) each against Arboriculture EPR AR2, Contamination and Soil EPR CL5 and Noise and Vibration EPR NV4.

In total, seven (7) Non-compliance findings were closed during this Reporting Period, which comprised three (3) of the six (6) Non-compliance findings that were raised during this Reporting Period and four (4) of five (5) Non-compliance findings that were open at the end of the previous Reporting Period (November 2024 to April 2025). The four (4) Non-compliance findings that remained open at the end of this Reporting Period included: one (1) each related to Contamination and Soil EPR CL1, Contamination and Soil EPR CL5 and Surface Water EPR SW5 that were raised during this Reporting Period; and, one (1) raised against EPR NV4 from the previous Reporting Period (i.e., November 2024 to April 2025).

Additionally, 24 AFIs were raised against the following seven (7) EPRs during this Reporting Period: one (1) each related to Environmental Management Framework EPR EMF1, Environmental Management Framework EPR EMF2, Business EPR B1 and Contamination and Soil EPR CL1; two (2) related to Social and Community EPR SC3; seven (7) related to Contamination and Soil EPR CL5; and 11 related to Surface Water EPR SW5. The FIEA notes that seven (7) AFIs were open at the end of the previous Reporting Period (November 2024 to April 2025), which were associated with five (5) EPRs: three (3) related to Environmental Management Framework EPR EMF2; one (1) each related to Air Quality EPR AQ1, Contamination and Soil EPR CL5 (May 2024 to October 2024), Surface Water EPR SW1 (May 2024 to October 2024) and Social and Community EPR SC3. The two (2) AFIs, which related to Contamination and Soil EPR CL5 and Surface Water EPR SW1, were identified in October 2024 (i.e., included with the May 2024 to October 2024 Reporting Period).

A total of 18 AFIs were closed during this Reporting Period. This includes all seven (7) AFIs that were open at the end of the previous Reporting Period (November 2024 to April 2025) and 11 of the 24 AFIs that were raised during this Reporting Period. The 13 AFIs raised during this Reporting Period that remained open at the end of this Reporting Period were related to

the following four (4) EPRs: one (1) each related to Business EPR B1 and Contamination and Soil EPR CL5; two (2) related to Social and Community EPR SC3; and nine (9) related to Surface Water EPR SW5.

Furthermore, a total of seven (7) Observations were raised against the following five (5) EPRs: one (1) each related to Environmental Management Framework EPR EMF1, Business EPR B1, Contamination and Soil EPR CL1, Noise and Vibration EPR NV3 and Surface Water EPR SW5; and two (2) related to Social and Community EPR SC3. The FIEA notes that five (5) Observations were open at the end of the previous Reporting Period (November 2024 to April 2025), which were associated with four (4) EPRs: two (2) were related to Environmental Management Framework EPR EMF2; one (1) each related to Air Quality EPR AQ1, Flora and Fauna EPR FF3, Social and Community EPR SC3.

A total of seven (7) Observations were closed during this Reporting Period. This includes all five (5) Observations open at the end of the previous Reporting Period (November 2024 to April 2025) and the two (2) Observations that were raised during this Reporting Period. The five (5) Observations that remained open at the end of this Reporting Period were related to the following four (4) EPRs which were identified during this Reporting Period: one (1) each related to Environmental Management Framework EPR EMF1; Business EPR B1 and Contamination and Soil EPR CL1; and two (2) related to Social and Community EPR SC3.

The findings which remained open at the end of this Reporting Period will be assessed for closure by the FIEA during the next Reporting Period.

### **5.3 East Package**

The East Package (ETSA) activities were considered to be compliant with all 30 EPRs audited within the scope of the single Environmental Performance Audit conducted against site investigation activities within this Reporting Period.

During this Reporting Period, three (3) AFIs were raised against the following two (2) EPRs: One (1) related to Arboriculture EPR AR2; and two (2) related to Contamination and Soil EPR CL5. All three (3) AFIs remained open at the end of this Reporting Period.

### **5.4 West Package**

The West Package (EHBA) activities were considered to be compliant with 51 of the 53 EPRs audited within the scope of the single Environmental Performance Audit conducted against site investigation activities within this Reporting Period.

During this Reporting Period, two (2) Non-compliance findings were raised against the following two (2) EPRs: one (1) each related to Environmental Management Framework EPR EMF2 and Flora and Fauna EPR FF8. Both Non-compliance findings remained open at the end of this Reporting Period.

Additionally, six (6) AFIs were raised against the following four (4) EPRs during this Reporting Period: one (1) each related to Environmental Management Framework EPR EMF2, Landscape and Visual EPR LV2 and Surface Water EPR SW4; and, three (3) related to Noise and Vibration EPR NV4. All six (6) AFIs remained open at the end of this Reporting Period.



## **5.5 Other FIEA Compliance Audits**

### **5.5.1 Project-wide EPRs (VIDA Roads)**

A Project-wide EPR Compliance Audit was not conducted during this Reporting Period.

The FIEA notes that the closure of the three (3) AFIs and the Observation which remained open at the end of the previous Reporting Period (i.e., November 2024 to April 2025) will be assessed by the FIEA during the next Project-wide EPR Compliance Audit to be conducted during the next Reporting Period (i.e., November 2025 to April 2025).



# Appendix A – EPRs Audited during this Reporting Period

## Appendix A1 - North Package

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

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

## Appendix A2 - South Package

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

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

## Appendix A3 - East Package

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

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

## Appendix A4 - West Package

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

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

## Appendix A5 - Project-wide EPRs (VIDA Roads)

A Project-wide EPR Compliance Audit was not conducted during this Reporting Period. The following table provides an overview of the 18 Project-wide EPRs that were relevant during the Reporting Period:

EPR Topic	EPRs that the FIEA are responsible for assessing	EPRs that the CP-IREA are responsible for assessing	EPRs relevant to the Freeway Package but not assessed during this Reporting Period
<b>Environmental Management (EMF)</b>	-	-	-
<b>Aboriginal Heritage (AH)</b>	-	-	-
<b>Air Quality (AQ)</b>	AQ4	-	AQ4
<b>Arboriculture (AR)</b>	AR2, AR3	-	AR2, AR3
<b>Business (B)</b>	-	B2, B3	-
<b>Contamination and soil (CL)</b>	-	-	-
<b>Flora and Fauna (FF)</b>	FF1, FF2, FF7, FF10	-	FF1, FF2, FF7, FF10
<b>Ground Movement (GM)</b>	-	-	-
<b>Groundwater (GW)</b>	-	-	-
<b>Historical Heritage (HH)</b>	-	-	-
<b>Land Use Planning (LP)</b>	LP5	-	LP5
<b>Landscape and Visual (LV)</b>	-	-	-
<b>Noise and Vibration (NV)</b>	NV2	-	NV2
<b>Social and Community (SC)</b>	SC3, SC4, SC5, SC7, SC8	-	SC3, SC4, SC5, SC7, SC8
<b>Surface Water (SW)</b>	SW15	-	SW15
<b>Sustainability and Climate Change (SCC)</b>	SCC2	-	SCC2
<b>Traffic and Transport (TT)</b>	T3	-	T3



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