Melbourne Metro Rail Project

PREPARED FOR METRO TUNNEL PROJECT OFFICE

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MAIN WORKS (RAIL NETWORK ALLIANCE)
ENVIRONMENTAL AUDIT SUMMARY
REPORT 2025

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Glossary

TERM / ABBREVIATION	DESCRIPTION
AQMP	Air Quality Management Plan
AQIA	Air Quality Impact Assessment
AJM JV	Aurecon Jacobs Mott MacDonald Joint Venture
BDP	Business Disruption Plan
BSGC	Business Support Guidelines for Construction
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CSEMF	Community and Stakeholder Engagement Management Framework
CSEMP	Community and Stakeholder Engagement Management Plan
CYP	Cross Yarra Partnership
DTP	Department of Transport and Planning
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMS	Environmental Management System
EPRs	Environmental Performance Requirements
HMP	Heritage Management Plan
HCMTs	High Capacity Metro Trains
IEA	Independent Environmental Auditor
ISO 14001:2015	AS/NZS ISO 14001:2015 Environmental management systems — Requirements with guidance for use
MMRA	Melbourne Metro Rail Authority
MTP or Project	Metro Tunnel Project
OEMP	Operational Environmental Management Plan

TERM / ABBREVIATION	DESCRIPTION
PIO	Where in the course of the audit work, an opportunity has been identified to improve a process or procedure.
RIA	Rail Infrastructure Alliance
RIMG	Residential Impact Mitigation Guidelines
RNA	Rail Network Alliance
RPV	Rail Projects Victoria
RSA	Rail Systems Alliance
SEIP	Site Environmental Implementation Plan
SWMP	Surface Water Management Plan
TPZ	Tree Protection Zone
TMP	Traffic Management Plan
UDMP	Urban Design Management Plan
UDS	Urban Design Strategy
VAGO	Victorian Auditor-General's Office
VAGO Early Works Audit Report	Victorian Auditor-General's Office (6 June 2019) *Melbourne Metro Tunnel Project – Phase 1: Early Works*
VIDA	Victorian Infrastructure Delivery Authority
WMS	Work Method Statement
WSUD	Water Sensitive Urban Design

1. Executive Summary

Major construction of the Metro Tunnel Project (MTP) and five (5) new stations have been completed. MTP opened on 30 November 2025, creating a new end-to-end rail line from Sunbury in the west to Cranbourne/Pakenham in the south-east, with high-capacity trains and five (5) new underground stations. Additional works for MTP will continue to take place in 2026, including works on the Town Hall Station precinct, Kensington and other work sites.

A key recommendation of the Victorian Auditor-General Office (VAGO) Early Works Audit Report, regarding its assessment of environmental strategies and risk mitigation, was to develop summaries of the Project's Independent Environmental Auditor (IEA) reports and publish such summaries on the MTP official website. This report has been developed to meet the above recommendation of the VAGO Early Works Audit Report and to provide the wider public with information of the Project's environmental performance during the Main Works.

This report is specific to the Rail Systems and Rail Infrastructure works packages. All the remaining work on these packages will be delivered by a consortium called the Rail Network Alliance (RNA), comprising John Holland, CPB Contractors, Alstom, AECOM, MTP and Metro Trains. This report covers RNA works during the 2025 reporting, including two (2) audit reports from Q1 2025 and Q3 2025. Whilst under the Environmental Management Framework (EMF), audits are required on a quarterly basis, a Q2 and Q4 2025 audit was not undertaken, as there were no site works underway at the time.

The auditing program within the scope of this report identified that, in general, the works were undertaken in accordance with the requirements of the EMF, relevant Environmental Performance Requirements (EPRs) and MTP Incorporated Document. No 'does not comply' finding was raised during this reporting period. A total of four (4) 'partially complies' findings were raised during this reporting period by the IEA. Two (2) were addressed by RNA in a timely manner and closed out within the same reporting period by RNA corrective actions. Only one (1) 'potential improvement opportunity' was identified, however the IEA does not require RNA to close out potential improvement opportunities and therefore no follow-up was required. Three (3) 'positive observations' were noted.

The auditing process is designed to lead to continual improvement during projects - this is key to implementing best practice ISO14001 environmental management systems. As such, potentially opportunities for improvement, partially compliances and non-compliances were identified.

2. Introduction

2.1 Purpose

Metro Tunnel Project (MTP) office is part of Victorian Infrastructure Delivery Authority (VIDA) that is responsible for delivering the state's transport infrastructure programs. MTP, previously known as Rail Projects Victoria (RPV), engaged Aurecon Jacobs Mott MacDonald Joint Venture (AJM JV) to prepare a summary report of the IEA audit reports for the MTP Main Works in 2025.

This report relates to the Rail Infrastructure & Systems Packages for the Project and summarises findings from the IEA audits undertaken in the same time period. From 2022, all the remaining work on these packages has been delivered by a consortium called the Rail Network Alliance (RNA), comprising John Holland, CPB Contractors, Alstom, AECOM, MTP and Metro Trains.

This audit summary report request follows a recommendation outlined in the VAGO Early Works Audit Report. That report assessed the environmental strategies and risk mitigation and recommended that the Department of Transport, now Department of Transport and Planning (DTP), should publish summaries of key findings and recommended actions from past and future IEA reports produced for MTP on the Project's official website. The purpose of this audit summary report is to meet the above recommendation of the VAGO Early Works Audit Report and provide the wider public with information of MTP's Rail Systems and Rail Infrastructure works packages environmental performance during the Main Works Package.

2.2 Project Background

2.2.1 THE METRO TUNNEL PROJECT

Major construction of MTP and five (5) new stations have been completed. The Victorian Government opened MTP on 30th November 2025. MTP connects the Sunbury line to the Cranbourne and Pakenham lines through new twin nine-kilometre rail tunnels and five (5) new underground stations. MTP has transformed Melbourne's rail network into an international-style metro system, boosting the capacity of the rail network to keep pace with Melbourne's growing population and rail patronage.

MTP will provide the foundation for expanding Melbourne's public transport network, helping to ensure Melbourne remains one of the world's most liveable cities now and into the future. MTP will also stimulate significant urban renewal, creating opportunities for new housing, commercial development and jobs in and around the CBD, whilst improving train travel to and from the suburbs.

The infrastructure required for construction of MTP includes:

- Twin nine-kilometre rail tunnels from Kensington to South Yarra, connecting the Sunbury and Cranbourne/Pakenham railway lines through the CBD.
- Rail tunnel portals (entrances/exits) at Kensington and South Yarra.
- New underground stations at Arden, Parkville (under Grattan Street), State Library (at the northern end of Swanston Street), Town Hall (at the southern end of Swanston Street), and Anzac (under the Domain interchange on St Kilda Road. State Library and Town Hall stations will feature direct interchange with the existing Melbourne Central and Flinders Street Stations respectively.
- Train/tram interchange between Anzac Station and the Domain Interchange.
- High-Capacity Signalling to maximise the efficiency of the new fleet of High-Capacity Metro Trains (HCMTs) that will run along the Sunbury, Cranbourne/Pakenham lines and the Metro Tunnel in the future.
- Some project elements' nomenclature (e.g. station names) have changed during the delivery of the Project and audit findings may reflect superseded nomenclature, with the updated name provided in brackets.

2.2.2 MTP WORK PACKAGES

MTP forms part of the VIDA (formerly known as the Major Transport Infrastructure Authority), which is responsible for facilitating the development and delivery of the biggest transport infrastructure program in Victorian history. Figure 2-1 shows a broad schematic plan for the principal components of MTP. Construction of MTP is being delivered by VIDA in partnerships with contracted Delivery Partners.

TABLE 2-1 MTP WORKS PACKAGES

PACKAGE	DESCRIPTION
Early Works	The Early Works Package including three (3) sub-packages of works, each delivered by a Managing Contractor, Yarra Trams and Utility Service Providers.
Main Works	The Tunnels and Stations Works Package, being delivered by Cross Yarra Partnership (CYP).
	The Rail Infrastructure Works Package associated with the Eastern and Western Tunnel Entrances and the western turnback, was being delivered by the Rail Infrastructure Alliance (RIA). The Rail Systems and Rail Infrastructure Works Package for High Capacity Signalling, rail systems integration and commissioning, was being delivered by the Rail Systems Alliance (RSA). In 2022, RIA and RSA integrated to form a consolidated alliance known as the 'Rail Network Alliance' (RNA), to deliver the remaining infrastructure and systems works Metro Tunnel need for operation. The Rail Network Alliance comprises John Holland, CPB Contractors, AECOM, Alstom, MTP and Metro Trains. Audit summary reports for subsequent reports will be combined for RNA.

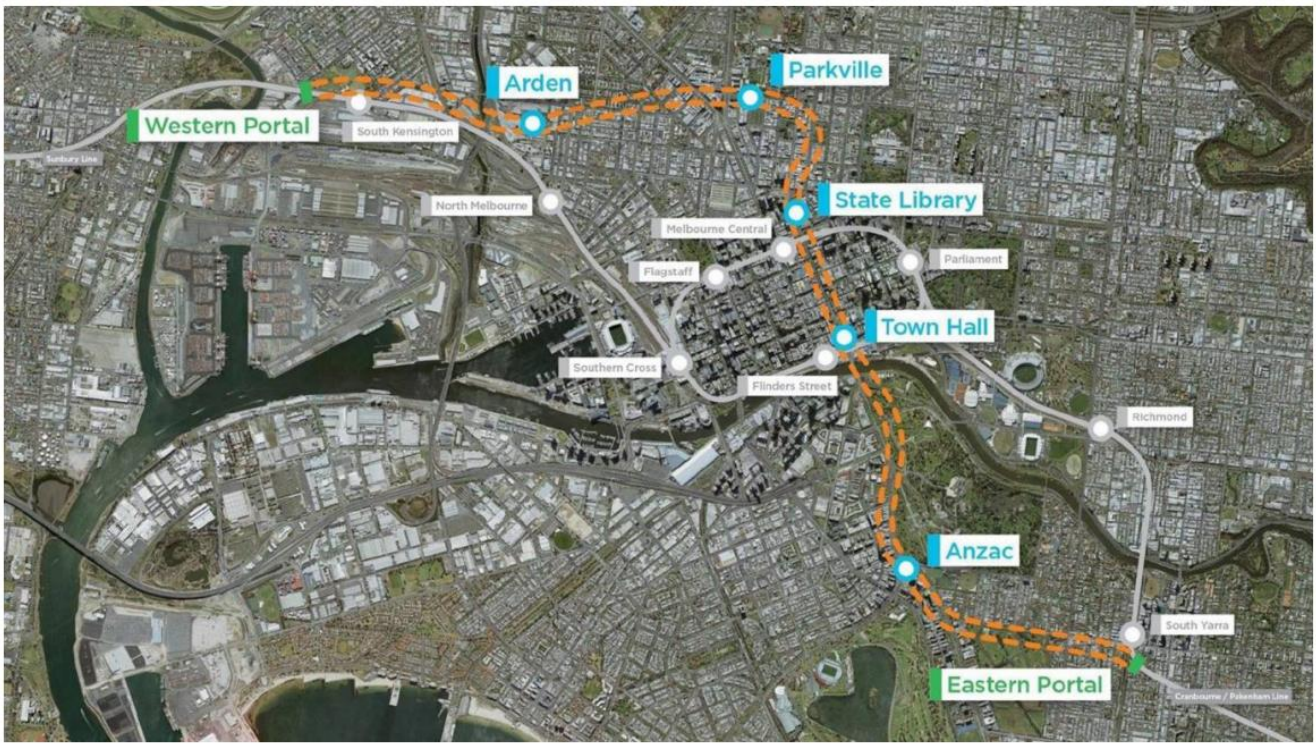

FIGURE 2-1 MTP SCHEMATIC PLAN

2.3 Scope

This report summarises environmental audits conducted as part of the MTP Main Works being delivered under the Rail Infrastructure Works Package. The report summarises the IEA audits undertaken in 2025, outlined in Table 2.2. The report covers all works for the Rail Systems and Rail Infrastructure Works Packages of MTP conducted under the Planning Scheme Amendment (GC82) and associated Incorporated Document approved and published in the Government Gazette on 26 June 2018 and the associated Melbourne Metro EMF.

Subsequent summary audit reporting will be completed on an annual basis.

TABLE 2-2 IEA AUDIT REPORTS IN SCOPE

PACKAGE	SCOPE	RELEVANT IEA REPORTS IN SCOPE
GC82 - Rail Systems and Infrastructure Works, being delivered by Rail Network Alliance (RNA)	Publish key findings for IEA Audit reports from Q1 2025 until Q4 2025	KPMG Audit Reports: Q1 2025 and Q3 2025. A Q2 and Q4 2025 audit was not undertaken, as no site works were being undertaken in the Q2 and Q4 audit period. Audits will re-commence in Q1 2026.

From 2022, RIA and RSA integrated to form a consolidated alliance known as the 'Rail Network Alliance' (RNA), to deliver the remaining infrastructure and systems works Metro Tunnel need for operation. The following Packages are excluded from this report:

- Works carried out from 2018 to 2024 have been addressed in separated IEA summary reports which have been completed and have been published on MTP's website.
- Tunnels and Stations Works Package, being delivered by CYP; are covered by a separate report.
- Rail Infrastructure and Rail Systems Planning Scheme Amendments works being carried out under Planning Scheme Amendment (PSA) GC96.

3. Environmental Management

3.1 Environmental Governance Framework

An Environment Effects Statement (EES) has been prepared for MTP and, following the statutory EES process, an Incorporated Document was approved by the Minister for Planning, containing compliance obligations which must be achieved by the Delivery Partners.

Each Delivery Partner is required to:

- Comply with the requirements of the Incorporated Document under the Planning Scheme Amendment (GC82) which was approved and published in the Government Gazette on 26 June 2018.
- Comply with the Environmental Management Framework (EMF) that has been approved by the Minister for Planning and is published on the MTP website. Among other things, the EMF includes the Environmental Performance Requirements (EPRs), the Residential Impact Mitigation Guidelines (RIMG) and the Business Support Guidelines for Construction (BSGC).
- Comply with the EPRs, which includes a requirement to prepare plans to document the approach to compliance.
- Develop, implement and maintain a project-specific Environmental Management System (EMS) that meets the requirements of ISO14001:2015 Environmental Management Systems, Construction Environmental Management Plan (CEMP) and Site Environmental Implementation Plans (SEIPs) for the design and construction phases, where applicable.
- Comply with the MTP EMS.
- Develop a Community and Stakeholder Engagement Management Plan (CSEMP) consistent with the MTP CSEMP.

The governance framework and relevant roles and responsibilities for MTP are set out in the EMF and are included in Section 3 of this Summary Report.

The governance framework for MTP is presented in Figure 3-1.

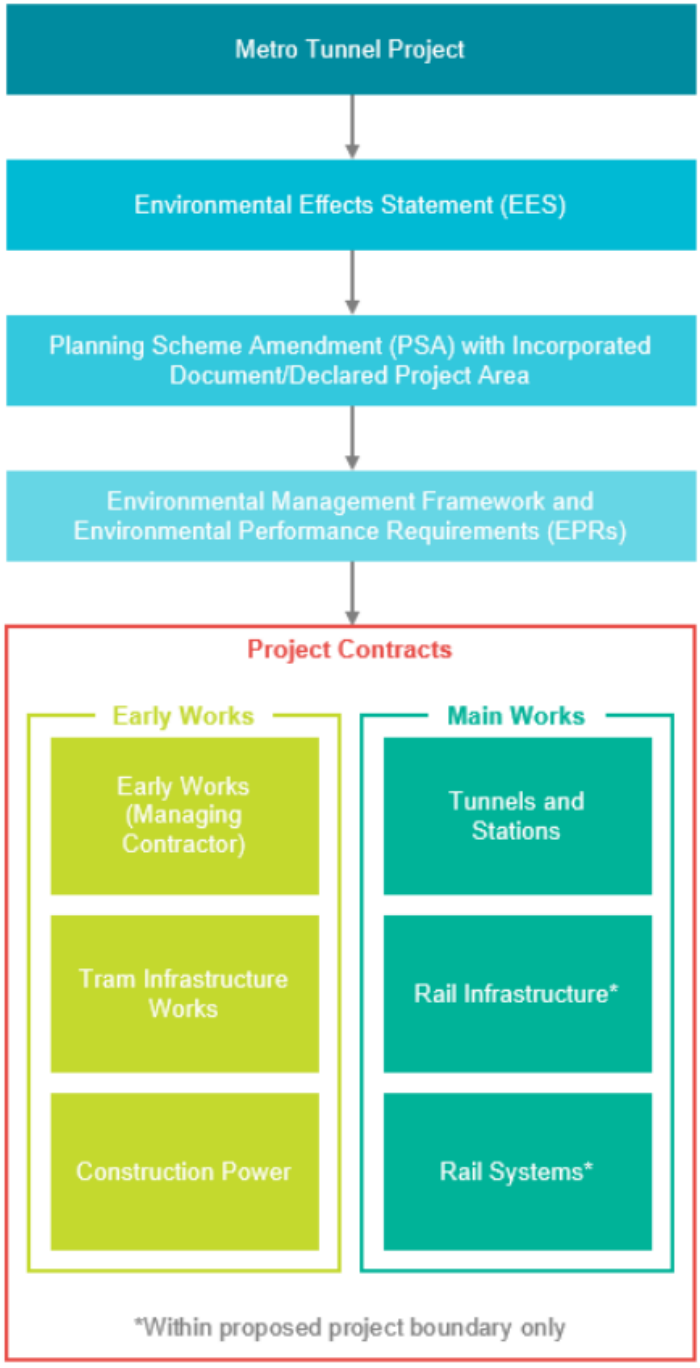

FIGURE 3-1 GOVERNANCE FRAMEWORK

3.1.1 ENVIRONMENTAL MANAGEMENT FRAMEWORK

The Incorporated Document describes the requirements of the EMF. The main elements of the EMF for the design and construction phase are:

- Applicable legislative requirements and approvals.
- EPRs, which address matters set out in the Incorporated Document and identified through the EES.
- The RIMG and the BSGC.
- A CEMP, together with subordinate document including SEIPs, EMS and other plans identified in the Incorporated Document and EMF.

The EMF documentation is summarised in Figure 3-2.

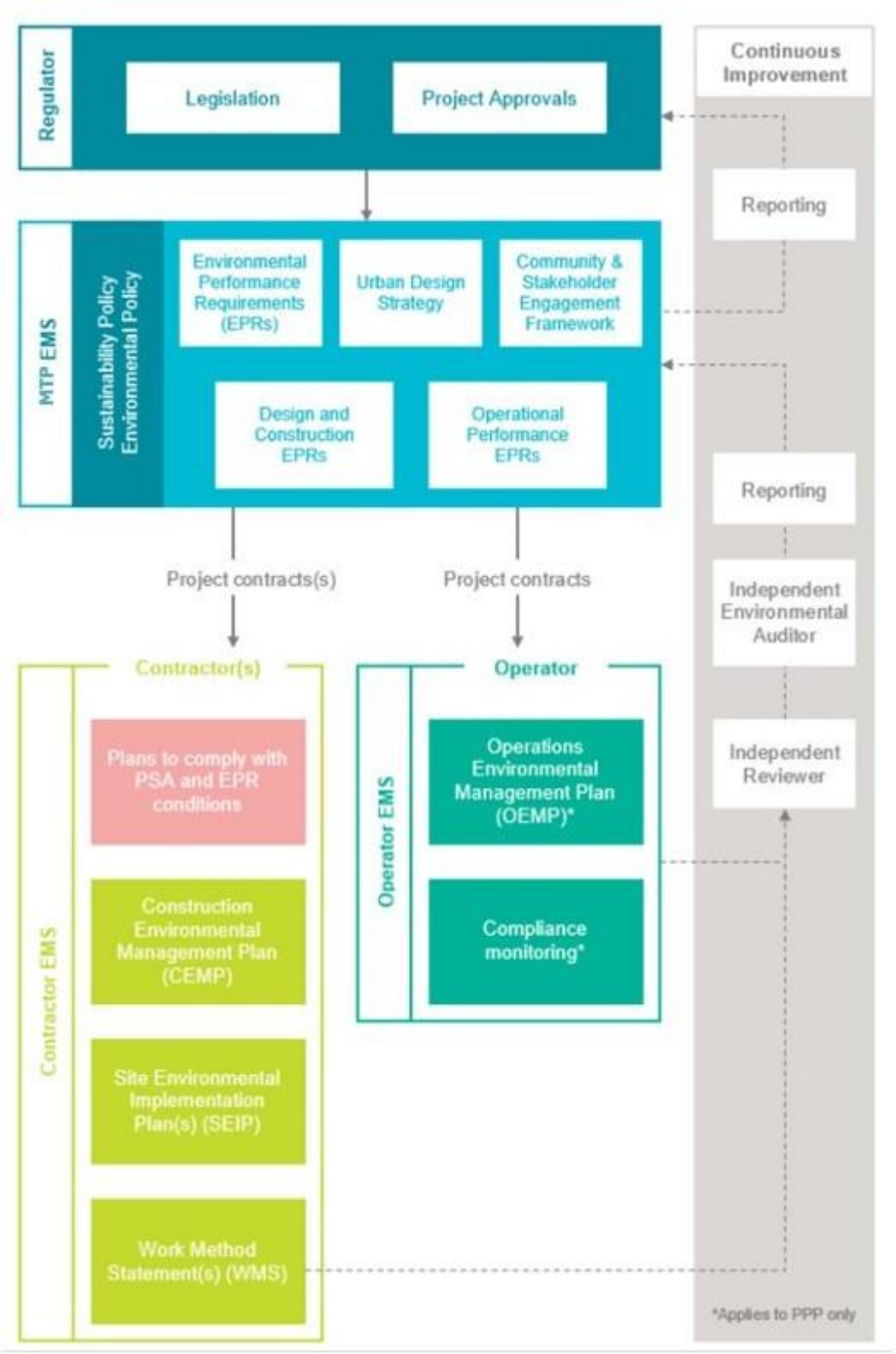

FIGURE 3-2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

The EMF requires that the Delivery Partners develop and implement an EMS certified to ISO 14001:2015 consistent with relevant legislation, policy and guidelines and MTP's Environmental Policy.

The EMF provides the governance framework to manage environmental aspects identified through the EES process, including the Minister for Planning's assessment, for the design, construction and operational phases of the MTP.

3.1.2 ENVIRONMENTAL PERFORMANCE REQUIREMENTS

EPRs have been developed through the EES and associated consultation processes, and to reflect the Minister for Planning's assessment of the EES and the requirements of the MTP Incorporated Document.

MTP is required to be delivered in accordance with approved EPRs that define the project-wide environmental outcomes that must be achieved during design, construction and operation of MTP. This performance-based approach allows for a delivery model with sufficient flexibility to encourage innovation by the private sector to determine how any recommended EPRs would be achieved.

The EES presented a risk-based assessment of environmental effects of the MTP, in accordance with the EES Scoping Requirements. Potential mitigation measures were typically included in the EES as examples of how an environmental effect could be mitigated and to illustrate how an EPR could be implemented. However, the EES generally did not mandate or commit to a particular mitigation or management outcome. In the same manner, the EPRs do not typically mandate or require a particular mitigation or management solution. Instead, the EPRs are implemented by applying an assessment of the nature and extent of the relevant environmental effects, and the most practicable means of mitigating and managing those effects. This method is used so that the management and mitigation measures implemented are proportional to the effect they are designed to address and achieve the outcome prescribed by the EPR.

The MTP Incorporated Document requires that the MTP is constructed and operated in accordance with the EPRs approved by the Minister for Planning. Each Delivery Partner is to comply with the EPRs and prepare necessary plans prior to commencement of their scope of work to document the approach to compliance with each EPR.

3.1.3 ASSOCIATED MANAGEMENT PLANS

MTP together with the Delivery Partners (as relevant) prepared plans to comply with the approval requirements in the MTP Incorporated Document. MTP and the Delivery Partners developed and implemented these management plans and programs in accordance with the processes detailed in the EMF.

3.2 Roles and Responsibilities

3.2.1 METRO TUNNEL PROJECT

MTP, on behalf of the Victorian Government, is responsible for delivering MTP in line with the requirements and objectives of DTP and the Victorian Government. MTP forms part of VIDA (formerly known as the Major Transport Infrastructure Authority), which is responsible for facilitating the development and delivery of the biggest transport infrastructure program in Victorian history.

The key roles and responsibilities of MTP for the MTP are set out in the EMF and include:

- Obtain applicable principal statutory approvals including the Planning Scheme Amendment (PSA), Cultural Heritage Management Plan (CHMP) and some heritage permits, where it is more appropriate for MTP to seek these consents.
- Establish the EMF, including the RIMG and the BSGC for approval by the Minister for Planning as required by the MTP Incorporated Document.
- Establish the Urban Design Strategy (UDS) and the CSEMF for approval by the Minister for Planning, as required by the MTP Incorporated Document and EPRs.
- Develop and implement the MTP EMS, in accordance with ISO 14001:2015.
- Monitor compliance with the EPRs across all Project Contracts and comply with the EPRs applicable to MTP.
- Together with each Delivery Partner for each of the Project Contracts, develop and submit the requisite plans to comply with the MTP Incorporated Document and the EMF.
- Review and approve contract documentation for each Project Contract in accordance with the EMF, including the CEMPs, SEIPs, Transport Management Plans, Business Disruption Plans (BDPs) and Construction Noise and Vibration Management Plans (CNVMP) as required by the MTP Incorporated Document.

- Review the CSEMP for each Project Contract.
- Prior to commencement of work, verify that the Delivery Partner has complied with the relevant EPRs.
- Review the Delivery Partner's performance against the approved EPRs and take corrective action as necessary.
- Commission the Independent Environmental Auditor to determine Delivery Partner compliance with the EMF, EPRs and relevant Delivery Partner Management.

3.2.2 DELIVERY PARTNERS

Construction of MTP is being delivered by MTP on behalf of the Victorian Government in partnerships with contracted Delivery Partners. The key roles and responsibilities of each Delivery Partner for the MTP are set out in the EMF and the contractual obligations and include:

- Comply with the EMF (including the EPRs, RIMG, BSGC and CSEMF), legislative and approval requirements.
- Obtain any additional permits from regulatory authorities (other than the approvals that would be obtained by or jointly with MTP).
- Develop and implement a project specific EMS or apply their existing EMS to the specific activities for the MTP, that is certified to ISO 14001:2015.
- Prepare a CEMP, SEIPs and associated work method statements (WMS), and other plans required by the MTP Incorporated Document, EPRs or Project Contracts.
- Develop a CSEMP consistent with MTP's CSEMF approved by the Minister for Planning in accordance with EPR SC3.
- Provide adequate resources to establish, implement, maintain and improve the CEMP, SEIPs and the EMS.
- Implement and maintain compliance with the EPRs.
- Undertake environmental audits to confirm compliance with the EMF, EPRs and plans required by the MTP Incorporated Document.
- Prior to commencement of work, ensure that all sub-contractors have complied with the relevant EPRs, CEMP and plans required to comply with the EPRs and MTP Incorporated Document, where relevant.
- Review of sub-contractor's performance against the EPRs and CEMP and take corrective action as necessary.

3.2.3 INDEPENDENT ENVIRONMENTAL AUDITOR

The IEA undertakes environmental audits of compliance with plans required to comply with the EPRs and MTP Incorporated Document prior to implementation, as well as during project activities, to verify compliance with the EMF, EPRs, environmental management plans and approval requirements. This also includes investigations into trends in complaints, by topic or on a random basis.

The key roles and responsibilities of the IEA during the Main Works Packages, as specified in the EMF, are:

- Prior to commencement of work, verify that the Delivery Partner has complied with the relevant EPRs, the EMF and the MTP Incorporated Document.
- Conduct audits of the Delivery Partner's works to assess compliance with the CEMP, EMF, EPRs and plans required by the EPRs and MTP Incorporated Document.
- Prepare audit reports containing the results of audits.
- Review complaints which may highlight instances of non-conformance with applicable EPRs.

4. Conduct of Audits

4.1 IEA Audit Requirements

Audits of each Delivery Partner's CEMP, sub-plans and SEIPs were required prior to works commencing to confirm compliance with ISO 14001:2015, the EMF, relevant EPRs and MTP Incorporated Document.

Site audits were scheduled on a quarterly basis through the delivery of the Main Works Package and considered:

- The timing of works.
- The nature of the works including consideration of the level of associated risk.
- Incident investigation outcomes.
- Complaints received, particularly if related to EPRs and indicate instances of non-conformances.
- Previous audit outcomes.
- Management review outcomes: upon the completion of each audit, an audit report detailing all the findings was submitted to MTP.

4.2 IEA Audit Methodology

4.2.1 AUDIT OVERVIEW

The MTP EMF outlines the IEA responsibilities, including:

- Conduct audits of the Delivery Partner's works to assess compliance with the CEMP, EMF, EPRs and plans required by the EPRs and MTP Incorporated Document.
- Prepare a report summarising the Contractor's compliance with the EMF and provide to MTP and the Delivery Partner.
- Prepare audit reports containing the results of audits.
- Review complaints which may highlight instances of non-conformance with applicable EPRs.

4.2.2 AUDIT PROGRAM

Audits of the Delivery Partner's CEMP, sub-plans and SEIPs involved a review of each document to assess compliance with ISO 14001:2015, the EMF, relevant EPRs and MTP Incorporated Document. During site inspections, compliance was assessed through observation of project activities, interviews and review of relevant environmental records.

The audit schedule was developed so that the EPRs considered in each audit would be relevant to the Construction activities at that time. Prior to each audit, key environmental aspects were identified in consultation with MTP and RNA. The key environmental aspects were decided based on these discussions, taking into consideration previous findings and any relevant stakeholder engagement.

These key environmental aspects formed the scope for each environmental audit and broadly covered the documentation listed in Section 4.2.1.1 and the works listed in Section 4.2.1.2 and 4.2.2.3. During the course of the audit program KPMG followed up the status of findings of the previous reports until each finding was satisfied and closed.

4.2.2.1 Documentation

The MTP EMF required RNA to produce the following management plans and environmental documentation:

- CEMP and associated sub plans

- SEIP
- Air Quality Management Plan
- Ecology Management Plan
- Heritage Management Plan
- Surface Water Management Plan
- Spoil Management Plan
- Monitoring Management Plan
- Construction Noise & Vibration Management Plan
- Health and Safety Management Plan
- Tree Management Plan
- Traffic Management Plans
- Urban Design Management Plan
- Urban Ecology Management Plan
- Sustainability Management Plan
- BDP
- CSEMP
- Ground Movement Management Plan
- EMS Manual
- Other documentation (as required).

4.2.2.2 Works

The RNA works under GC82 have been undertaken in three (3) key construction precincts: Western (Tunnel Entrance) Portal, Eastern (Tunnel Entrance) Portal and Western Turnback. Key activities being carried out by RNA included:

- Construction of concrete structures including approach, decline and cut and cover
- Structural steel works
- Services works, including power and drainage
- Road construction
- Landscaping
- Traffic management
- Civil works to support the tunnel entrance construction
- Combined services route installation and relocation
- Signalling equipment installation
- Overhead wiring works
- Track works
- Construction of a third station platform West Footscray platform.

Remaining RNA works include:

- Roof restoration works at Hobsons Road (following completion of demolition of heritage buildings last year): Nov 2025 to April 2026; and
- Western Portal Stage 2 works including drainage, CSR, track works, installing of new overhead structures, and other works: Q2 and Q3 2026.

4.2.2.3 Complaints

Complaints are addressed during the course of the IEA Audits through auditing EPR SC4 Communications and Stakeholder Relations and how the delivery partner is implementing the complaints management process. Findings against this process may result in non-conformance if complaints are not being appropriately managed. Where there are no specific IEA findings against under the CEMP, complaints are being managed in accordance with the relevant plans.

4.2.3 AUDIT CLASSIFICATIONS

The IEA (KPMG) used different audit classifications during the relevant period that were attributable to the type of audit being carried out.

- Pre-commencement audits were documentation-based desktop audits, testing plans, sub-plans and other relevant documentation against selected EPRs. A compliance-based classification was agreed as the most suitable means of rating the findings.
- Implementation Audits were initially agreed to be based on risk levels to consider the relative potential impacts of non-compliances.

However, after initial Implementation Audits had been completed, it was decided that audit findings would be better suited as a compliance-based classification, which also better aligned to the purpose of the audits. This also allowed for consistency with the pre-commencement desktop audits and a direct comparison of findings.

The Audits from the 2022 period were all Implementation Audits and followed the compliance-based classification system seen in Table 4.1.

TABLE 4-1 AUDIT CLASSIFICATIONS

FINDING	DESCRIPTION
Complies (C)	The response fully satisfies the requirement (being a requirement of a framework, standard or other guidance used to set the performance standard of the project)
Does Not Comply (DNC)	The response does not satisfy the requirement.
Partially complies (PC)	The response partially satisfies the requirement; is in progress to satisfy the requirement or is part of a demonstrated Sub-Plan or plan to satisfy the requirement. Note: This rating may apply where responses have not been completed at the time of the audit (e.g., due to their timing or prioritisation in relation to the overall project plan) but is used to track compliance at a later date (e.g. as part of a subsequent audit).
Potential Improvement Opportunity (PIO)	Where in the course of the audit work, an opportunity has been identified to improve a process or procedure. A PIO is an opportunity to improve upon a process or procedure. It does not represent a non-compliance and therefore is not required to be addressed to achieve compliance. For this reason, there is no follow up required to close out PIOs.

5. Audit Findings Summary

5.1 Implementation Audit Q1 2025

5.1.1 AUDIT SCOPE

The Implementation Audit (GC82) conducted in Q1 2025 reviewed the compliance of RNA works against EPRs at the Eastern Portal, Western Portal, Western Turnback. This included confirmation that the RNA's management plans (including the CEMP and associated sub-management plans) complied with requirements.

EPRs reviewed within the scope of the Implementation Audit Q1 2025 under GC82 were:

- Air Quality: AQ2, AQ3
- Contaminated Land and Spoil Management: C1, C4
- Cultural Heritage – Historical: CH6, CH23
- Noise and Vibration: NV1, NV4, NV6, NV21
- Social and Community: SC4, SC10
- Surface Water: SW1
- Transport: T2

No findings were raised during the Implementation Audit Q3 2024 that required follow up during the Q1 2025 audit.

5.1.1.1 Audit Findings

This section summarises the IEA findings relevant to the Q1 2025 IEA Report.

MTP requires an implementation audit to be conducted of:

- The GC82 Rail Infrastructure works package as required under the Metro Tunnel Environmental Management Framework (MT EMF).

DTP engaged the services of the Independent Environmental Auditor (IEA) to assess (on a sample basis) that the Rail Network Alliance (RNA) is meeting selected requirements of the GC82 MTP EMF.

RNA is currently delivering works in the following areas:

- GC82 Western Portal (WP); and
    - GC82 Western Turnback (WT);

The scope of the works covered by the Q1 audit (Hobsons Road Demolition works GC82 RNA 2025) includes:

- An implementation audit of the environmental performance at 1-39 Hobsons Road Kensington (Former Glue Factory) demolition and retention works; and
    - Follow up and close out of any outstanding findings from the Q3 2024 audit and any other open audit findings.

The Q1 2025 audit involved conducting a desktop assessment of documentation provided by RNA, and in person interviews with relevant RNA personnel. All previous findings are closed. Overall, the Hobsons Road Demolition works 2025 RNA audit identified one (1) 'partially complies' finding, one (1) potential improvement opportunity and two (2) positive observations.

5.1.1.2 Does Not Comply

No findings raised as 'does not comply' during this audit.

5.1.1.3 Partially Complies

The Q1 2025 audit identified one (1) finding as 'partially complies' which relates to EPR AE2.

EPR AE2 includes the requirement that the '*best practice sedimentation and pollution control measures must be applied to protect waterways in accordance with Best Practice Environmental Management: Environmental Guidelines for Major Construction Sites – EPA publication 480 (1996) and in accordance with an approved CEMP.'*

The IEA determined that RNA have partially complied with the requirements of EPR AE2 to implement best practice sedimentation and pollution control measures per EPA 1834.1 as sediment logs were not observed at stormwater entry pits and points of discharged during the time of the audit. During site inspection on 27 February 2025, the IEA observed that although excavations were not occurring, there was slight pooling of turbid water in the culvert, presenting potential for turbid runoff from the demolition activities during a rainfall event. It was observed that stormwater drains located at the main vehicle entrance (Gate 2) to Hobsons Road and in the laneway at the main vehicle exit (Gate 1) were not protected with sediment logs.

This presents the following risks:

- insufficient pollution control measures in to minimise stormwater impact and protect local waterways; and
- misalignment with the Surface Water Management Plan, and subsequently the Best Practice Environmental Management, 1834.1: Civil construction, building and demolition guide.

The IEA raised this issue on site during the audit. During a post audit inspection at Hobsons Rd Demolition Works on 5th March 2025, evidence indicated that silt socks had since been installed at the stormwater drains located on Hobsons Road. The IEA recognised that no further action was required.

5.1.1.4 Potential Improvement Opportunity

The Q1 audit identified the following 'potential improvement opportunity' which relates to EPR SW1. EPR SW1 includes the following requirement:

'Prior to commencement of relevant works, for all Precincts (with the exception of the western turnback) design permanent and temporary works and, if necessary, develop and implement emergency flood management measures for the tunnels, ….and Arden electrical substation to provide appropriate protection against floodwaters and overland stormwater flows….'

The IEA determined that there was an opportunity for RNA to include documented flood management controls and evacuation procedures in the case of a flood emergency for the *Emergency and Evacuation process diagram* provided for the Western Portal and Glue Factory Demolition.

Given that the demolition works occurring are in an area subject to flood inundation, there exists a potential improvement opportunity to document and implement flood management, emergency and evacuation procedures to minimise risk of impacts from demolition activities to the environment, staff and public during a flood event.

The IEA does not require RNA to close-out 'potential improvement opportunities,' and therefore no follow up was required.

5.1.1.5 Positive Observations

The Q1 audit identified two (2) 'positive observations' relating to AQ2 and CH6.

EPR AQ2 includes the requirement for the Alliance to:

"Control the emission of smoke, dust, fumes and other pollution into the atmosphere during construction and operation in accordance with the SEPPs for Air Quality Management and Ambient Air Quality"

The IEA observed several proactive dust control and management measures being implemented onsite despite the low levels of dust being produced. These included:

- A Site Hive unit installed to continuously monitor 24/7 air quality at the site access point, which is also located between the site and the South Kensington Residential area;
- Several Asbestos air monitoring units surrounding the project boundary and within the demolition works zone to ensure 24/7 airborne asbestos monitoring;
- Prestart checks of plant were provided, which included checks for excessive emissions;
- Access to a Furphy water cart for dust control, with the ability to run water along the tracks and a sprinkler system sitting on towers that can be connected if required;
- Workers on standby dedicated to hosing for dust suppression during demolition works and Street sweepers on call.

The IEA observed that review of the dust monitoring data indicated that no reportable exceedances were recorded during the audit period. Similarly, review of the complaints and incidents indicated that no dust complaints nor incidents related to dust were received or reported during the audit period.

EPR CH6 includes the following requirement:

"Prior to commencement of relevant works which may directly or indirectly affect heritage places, develop and implement appropriate protection measures for heritage places and their settings. This is to be done in consultation with the land owner, and Heritage Victoria or relevant council (as applicable)".

The IEA observed a strong understanding of Cultural Heritage management particularly evident in the implementation of the unexpected finds protocol, with a find of a sub-surface basement Cellar that prompted works to stop and an ensuing heritage investigation with the Heritage Advisor. The IEA observed examples of the communication with the Heritage Advisor, as well as the conclusion of the investigation, which resulted in works being allowed to continue.

Additionally, the IEA observed that heritage aspects such as the Glueworks Façade, and roof tiling were clearly zoned and protected. It was communicated to the IEA, that the heritage tiles on the façade building will be salvaged as a priority by the Alliance, and that only damaged tiles would be replaced to ensure the majority of the heritage tiling could be maintained.

5.2 Implementation Audit Q3 2025

5.2.1 AUDIT SCOPE

The Implementation Audit conducted in Q3 2025 reviewed the compliance of RNA works against EPRs at the Eastern Portal, Western Portal and Eastern Corridor. EPRs reviewed within the scope of the Implementation Audit Q3 2025 under GC82 were:

- Environmental Management Framework: EMF1, EMF2
- Noise and Vibration: NV1, NV4, NV6, NV21
- Social and Community: SC10
- Transport: T2

The audit scope also incorporated the investigation of any open previous findings from the Q4 2024 - Q1 2025 audit to update their status and close where appropriate.

5.2.1.1 Audit Findings

This section summarises the IEA findings relevant to the Q3 2025 IEA Report.

MTP requires an implementation audit to be conducted of:

- The GC82 Rail Infrastructure works package as required under the Metro Tunnel Environmental Management Framework (MT EMF).

DMTP engaged the services of the IEA to assess RNA's environmental performance in relation to selected requirements of the GC82 MTP EMF. RNA is currently delivering works in the following areas:

- GC82 Western Portal (WP); and
- GC82 Western Turnback (WT).

The scope of the works covered by this Q3 audit (Tie Station Package 2025 RNA GC82) includes:

- An implementation audit of the environmental performance at 1-39 Hobsons Road Kensington (Former Glue Factory) demolition, retention works and installation of the prefabricated tie station building; and
- Follow up and close out of any outstanding findings from the Q4 2024 – Q1 2025 audit and any other open audit findings.

The Q3 audit involved conducting a desktop assessment of documentation provided by RNA, and in person interviews with relevant RNA personnel. All previous findings are closed.

Overall, the Q3 audit identified three (3) 'partially complies' findings and one (1) positive observation.

5.2.1.2 Does not Comply

No findings raised as 'does not comply' during this audit.

5.2.1.3 Partially Complies

The Q3 audit identified three (3) findings as 'partially complies' which all relate to EPR AE2. EPR AE2 includes the requirement that '*Best practice sedimentation and pollution control measures must be applied to protect waterways in accordance with Best Practice Environmental Management: Environmental Guidelines for Major Construction Sites – EPA publication 480 (1996) and in accordance with an approved CEMP*'

AE2 - Finding 1 (stormwater drains not appropriate protected)

The IEA determined that RNA have partially complied with the requirements of EPR AE2 to implement best practice sedimentation and pollution control measures per *EPA 1834.1 Civil Construction and Building Demolition Guide* (which superseded EPA Publication 480) as the required controls were not observed at stormwater entry pits and points of discharged during the time of the audit. During site inspection on 8 July 2025, the IEA observed that although excavations were not occurring, there was pooling of turbid water in the culvert, presenting potential for turbid runoff from the construction activities during a rainfall event. It was observed that stormwater drains located at the main vehicle entrance (Gate 2) to Hobsons Road were not protected with relevant controls (i.e. sediment logs or silt socks).

This presents the following risks:

- The absence of implemented stormwater control measures increases the risk of pollutants entering local waterways, potentially degrading water quality and harming aquatic ecosystems; and
- misalignment with the Surface Water Management Plan, and subsequently the Best Practice Environmental Management, 1834.1: Civil construction, building and demolition guide, creating a risk for non-compliance.

The IEA raised this issue on site during the audit. Through discussion with RNA, it was also noted stormwater sediment logs were previously installed, however were recently removed to facilitate street sweeping. Post-audit photographic evidence was provided the same day of the site visit, which confirmed silt socks had been reinstalled at the stormwater drains located on Hobsons Road. The IEA recognised that no further action was required.

AE2 - Finding 2 (missing or incomplete spill kits)

The IEA determined that RNA have partially complied with the requirements of EPR AE2 to implement best practice sedimentation and pollution control measures per EPA 1834.1 as the required controls were not observed at stormwater entry pits and points of discharged during the time of the audit. During site inspection on 8 July 2025, the IEA observed that several spill kits onsite that were not appropriately maintained or inspected. For example, a hydrocarbon spill kit was observed to be used as general rubbish bin which contained cigarette butts, food and beverage containers. In addition, several other spill kits had not been replenished since their previous use and also contained various rubbish contents within them. Through discussion with RNA, the IEA was advised spill kit checklists and inspections had not been completed regularly.

This presents the following risks:

- Ineffective maintenance, accessibility and usability of spill kits increases risk of failure to minimise impact from spills to the environment;
- Misalignment with the requirements outlined in 1834.1: Civil Construction, Building and Demolition Guide, the Victorian EP Act 2017, creating risk for non-compliance.

AE2 - Finding 3 (missing spill kit)

The IEA determined that RNA have partially complied with the requirements of EPR AE2 to implement best practice sedimentation and pollution control measures per EPA 1834.1 as a spill kit was not provided for a diesel fuel storage container located outside of the designated re-fuelling area during the time of the audit. During site inspection on 8 July 2025, the IEA observed that a self-bunded diesel fuel storage container was located outside the designated refuelling area, as detailed within the SEP. In addition, there was no dedicated spill kit located within proximity of the self-bunded diesel fuel storage. Although EPR AE2 was not included in the audit scope, the requirement to inspect regularly and maintain equipment (spill kits) to ensure good working order was not implemented in accordance with the SWMP, the Dangerous Good (Storage and Handling) Regulations 2012, the SEIP and the SEP.

This presents the following risks:

- Ineffective implementation and/or placement of diesel fuel storage and spill kits in designated areas, increasing risk of failure to mitigate impacts of spills or leaks relating to refuelling and maintenance activities; and
- Misalignment with the Dangerous Good (Storage and Handling) Regulations 2012, SWMP, the SEIP and the SEP, creating risk for non-compliance.

5.2.1.4 Potential Improvement Opportunity

No findings raised as ‘potential improvement opportunity’ during this audit.

5.2.1.5 Positive Observation

The Q3 audit identified one (1) ‘positive observations’ relating to EPR SC10.

EPR SC10 includes the requirement for the Alliance to:

“Prior to commencement of relevant works, provide written notice to adjoining landholders of any works to be carried out in a precinct. Such notice must advise of the works to be undertaken, the duration of those works, what local impacts might occur and contact details for further information”.

The IEA observed several respite and relocation measures being implemented to manage delivery of out of hours works. These included:

- Delivered tailored communications of relocation respite offers to sensitive receivers in line with the Communications and Stakeholder Engagement Management Plan (Rev 00);
- Offered relocation respite offers to a wider group of potential sensitive receptors beyond identified area(s) outlined in the Melbourne Metro Environmental Management Framework Appendix A – Residential Impact Mitigation Guidelines (RIMG); and
- Delivered regular and timely construction updates through door knocks, letterbox drops and email.

The IEA observed this approach minimised the potential construction impact on the community, so far as reasonably practicable. As a result, no complaints were received for the audit period, including the out-of-hours works conducted from 4/07/2025 to 7/07/2025.

6. Conclusions

The auditing programme identified that, in general, the works being delivered by RNA and summarised within this report was undertaken in accordance with the requirements of EMF, relevant EPRs and the MTP Incorporated Document. The auditing process is designed to lead to continual improvement during projects - this is key to implementing best practice ISO14001 environmental management systems. The audits carried out were focussed on particular activities, rather than ongoing Project works, including the Hobsons Former Glue Factory demolition and retention works and Tie Station Package 2025.

In the previous IEA summary report (MMR-AJM-PWAA-RP-NN-105185) for 2024 there was no findings of greater environmental significance / risk (i.e. does not comply findings). This trend continued in this reporting period with no ‘does not comply” finding being raised in this reporting period. In summary, RNA were generally compliant with their environmental obligations under the requirements of GC82.

A total of four (4) ‘partially complies’ findings were raised during this reporting period by the IEA. Two (2) were addressed by RNA in a timely manner and closed out within the same reporting period by RNA corrective actions. One (1) ‘potential improvement opportunity’ was identified, however the IEA does not require RNA to close out potential improvement opportunities and therefore no follow-up was required.

This summary report relates to the Main Works Package of the MTP RNA Works Package from start of 2025 until the end of 2025. Remaining works for the RNA package are relatively limited in scope, and include:

- Roof restoration works at Hobsons Road (following completion of demolition of heritage buildings last year): Nov 2025 to April 2026; and
- Western Portal Stage 2 works: May to July 2026 largely to be done under rail occupations.

It is considered that the environmental risk profile of the ongoing RNA works is relatively low in the context of MTP and therefore IEA audit reports may not be required. Where required, further summaries of key findings and recommended actions from future IEA reports produced for the remaining works packages of the MTP may be prepared and published on the project's official website.

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