

North East Link Program – Central Package

IEA Six-Monthly Summary Environmental Compliance Report – November 2023 to April 2024

A Report to the Minister for Planning

NEL-CNT-AAA-2990-EEE-REP-0004

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OFFICIAL





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Abbreviations

| | |
|----------------|--|
| AAAJV | APP, Arup, and Aurecon Joint Venture |
| Afl | Area for Improvement |
| ASS | Acid Sulphate Soil |
| BAAG | Bulleen Art and Garden |
| BIZ | Bulleen Industrial Zone |
| CCP | Construction Compound Plan |
| CEMP | Construction Environmental Management Plan |
| CNVIA | Construction noise and vibration impact assessment |
| D&C | Design and Construction |
| DP | Design Packages |
| EA | Environmental Auditor |
| EES | Environment Effects Statement |
| EMF | Environmental Management Framework |
| EPA | Environment Protection Authority |
| EPRs | Environmental Performance Requirements |
| ERSED | Erosion and Sediment Control (Plan) |
| ERS | Environmental Reference Standard |
| FP | Freeway Package |
| GDE | Groundwater dependent ecosystems |
| GWMP | Groundwater Management Plan |
| IEA | Independent Environmental Auditor |
| IFU | Issued for Use |
| IR | Independent Reviewer |
| ITS | Intelligent Traffic System |
| MAT | Monitoring Action Team |
| MP | Management Plan |
| N | Non-compliance |
| NDD | Non Destructive Drilling |
| NELP | North East Link Program |



| | |
|----------------------|--|
| O | Observation |
| OEMP | Operations Environmental Management Plan |
| OOH | Out of hours |
| OOHW | Out of hours work |
| P&ID | Process and instrumentation drawing |
| PPP | Public Private Partnership |
| PSA | Planning Scheme Amendment |
| PSDR | Project Scope and Delivery Requirements |
| SEP | Site Environment Plan |
| Spark D&C | Spark Design and Construction (Contractor) |
| SRD | Southern Road Diversion |
| TBM | Tunnel Boring Machine |
| TMP | Transport Management Plan |
| TWA | Trade Waste Agreement |
| UDLP | Urban Design and Landscape Plan |
| UN SDGs | United Nations Sustainable Development Goals |
| WASS | Waste Acid Sulphate Soil |
| WEMP | Worksite Environmental Management Plan |
| YVW | Yarra Valley Water |



Summary

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

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

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

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

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2023 to April 2024.

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

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

| Key Documents | Nov 23 (Monthly) | Dec 23 (Quarterly) | Feb 24 (Monthly) | Mar 24 (6-Monthly) | Apr 24 (Monthly) |
|---|---------------------|------------------------------|---|--------------------------------|---------------------|
| EPRs (as scheduled) | | ✓ | | ✓ | |
| Environmental Strategy | | | | ✓ | |
| Construction Environmental Management Plan | | ✓ (key elements) | | ✓ (all applicable elements) | |
| Management Plans required by the EPRs | | ✓ | ✓ (GWMP monitoring & reporting requirements) | ✓ | |
| Worksite Environmental Management Plans (WEMPs) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Construction Compound Plans (CCPs) | | ✓ (CCP-0010 and CCP-0012) | ✓ (CCP-0002) | | |



A total of fifty (50) audit findings were raised comprising six (6) Non-compliances, twenty-five (25) Areas for Improvement, and nineteen (19) Observations. Fifty-five (55) findings were closed during the reporting period. Twenty-one (21) findings remained open at the end of the reporting period.

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 5 | 6 | 6 | 5 |
| Afl | 14 | 25 | 29 | 10 |
| O | 7 | 19 | 20 | 6 |
| Total | 26 | 50 | 55 | 21 |

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

The audit findings trends over the last two reporting periods show that Spark’s documented environmental management arrangements have been revised to better reflect actual environmental management processes, and Spark’s implementation of these processes has improved. The number of audit findings against the process documents (Environment Strategy, CEMP, and Sub-Plans) has decreased. However, findings against the WEMPs, which largely manage on ground environmental controls, increased compared to the previous reporting period, and have been increasing since project commencement. The rise in WEMP-related findings corresponds with the increased scope and complexity of construction activities. However, the findings also note the need for Spark to further establish commensurate environmental controls.

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

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

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

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

Compliance with Environmental Performance Requirements

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

Fifty-nine (59) of the EPRs for which Spark is responsible were audited in the reporting period. Two (2) findings were raised against the requirements of the EPRs; both as Areas for Improvement. These findings related to the documented requirements for groundwater management and groundwater dependent ecosystems. Two findings were closed, and two remained open at the end of the reporting period.

Implementation of the Environmental Strategy

One new finding was raised against the requirements of the Environment Strategy during the reporting period. No previous findings were open.



Implementation of the Construction Environmental Management Plan

Eight (8) new findings were raised against the requirements of the CEMP; two (2) Non-compliances, four (4) Areas for Improvement, and two (2) Observations. The Non-compliances were related to documenting specific requirements in environmental approvals, and for not reporting breaches of environmental approvals to NELP and the IEA. The remaining findings were largely process related.

Eight (8) findings were closed and five (5) remained open at the end of the period.

Compliance with the Requirements of the Worksite Environmental Management Plans

Thirty-two (32) findings were raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, seventeen (17) Areas for Improvement, and thirteen (13) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. One Non-compliance was raised as the water authority had not been notified of a trade waste report within the required timeline, and another for the installation of the Manningham North compound prior to obtaining the required approval.

Thirty-two (32) findings were closed, and eight (8) remained open.

Compliance with the Requirements of the Management Plans

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

Seven (7) new findings were raised during the reporting period; two (2) Non-compliances, one (1) Area for Improvement, and four (4) Observations. One Non-compliance related to noise exceedences and associated complaints for Managed Impact out of hours works. The other Non-compliance was related to unpermitted dewatering. The remaining findings related to inadequate environmental controls at some works areas, and to unsatisfactory implementation of documented environmental management arrangements.

Eleven (11) findings were closed in the reporting period and five (5) remained open.

Compliance with the Requirements of the Construction Compound Plans

No new findings were raised against the requirements of CCPs. However, as noted above, a CCP-related Non-compliance finding was raised against the WEMP for Manningham North as the compound at Manningham North was installed prior to obtaining an approved CCP. The two (2) previous Areas for Improvement were closed.



1 Background to the audits

1.1 The North East Link Program

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

The North East Link Program (NEL) includes:

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

The Central Package Scope of Works includes:

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

Figure 1 shows an outline of the NEL works.

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

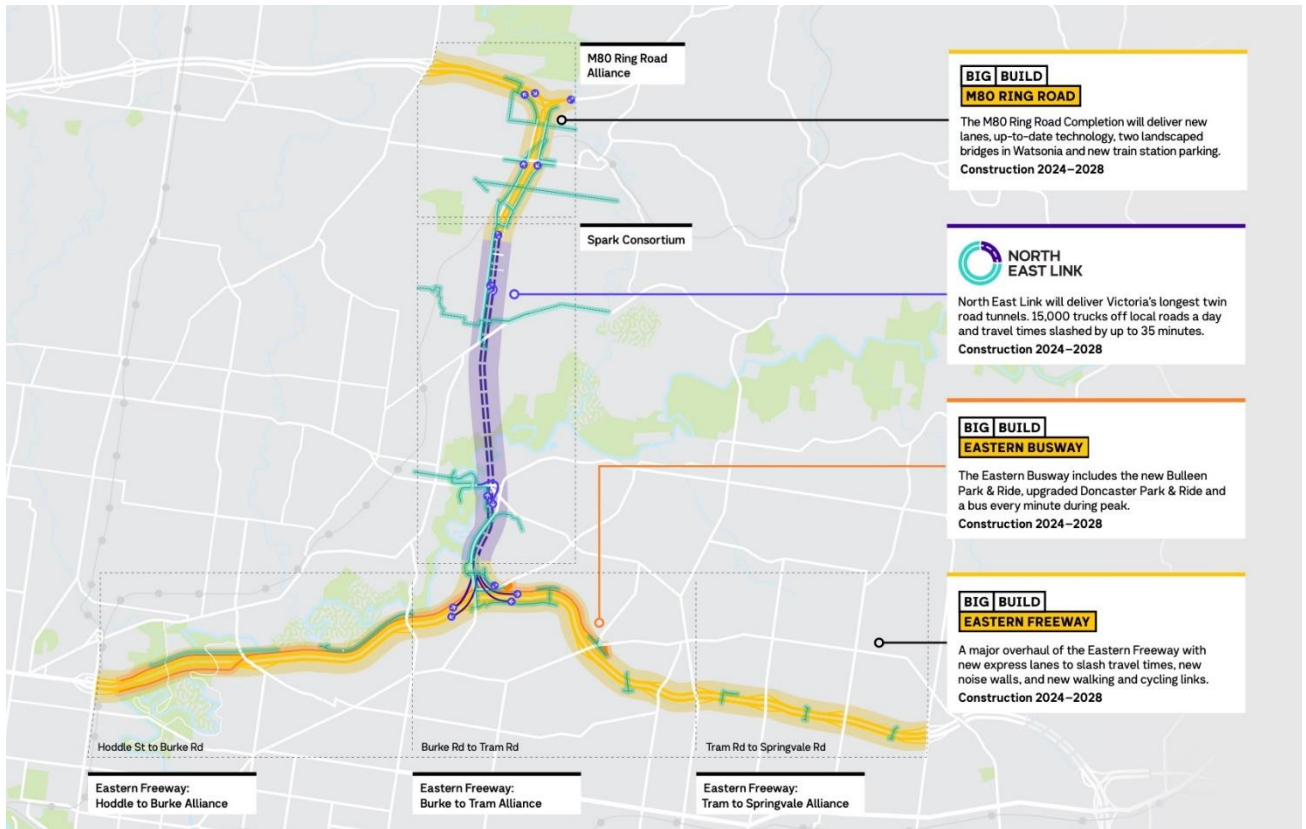


Figure 1: Schematic of the NEL works

1.2 NEL works

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

Project Wide

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



Northern

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

Southern

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

Tunnels

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

1.3 Purpose of this report

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2023 to April 2024.



2 Environmental Management Requirements

2.1 Environmental Management Framework

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

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

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

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

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

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

The EMF documentation is summarised below in Figure 2.

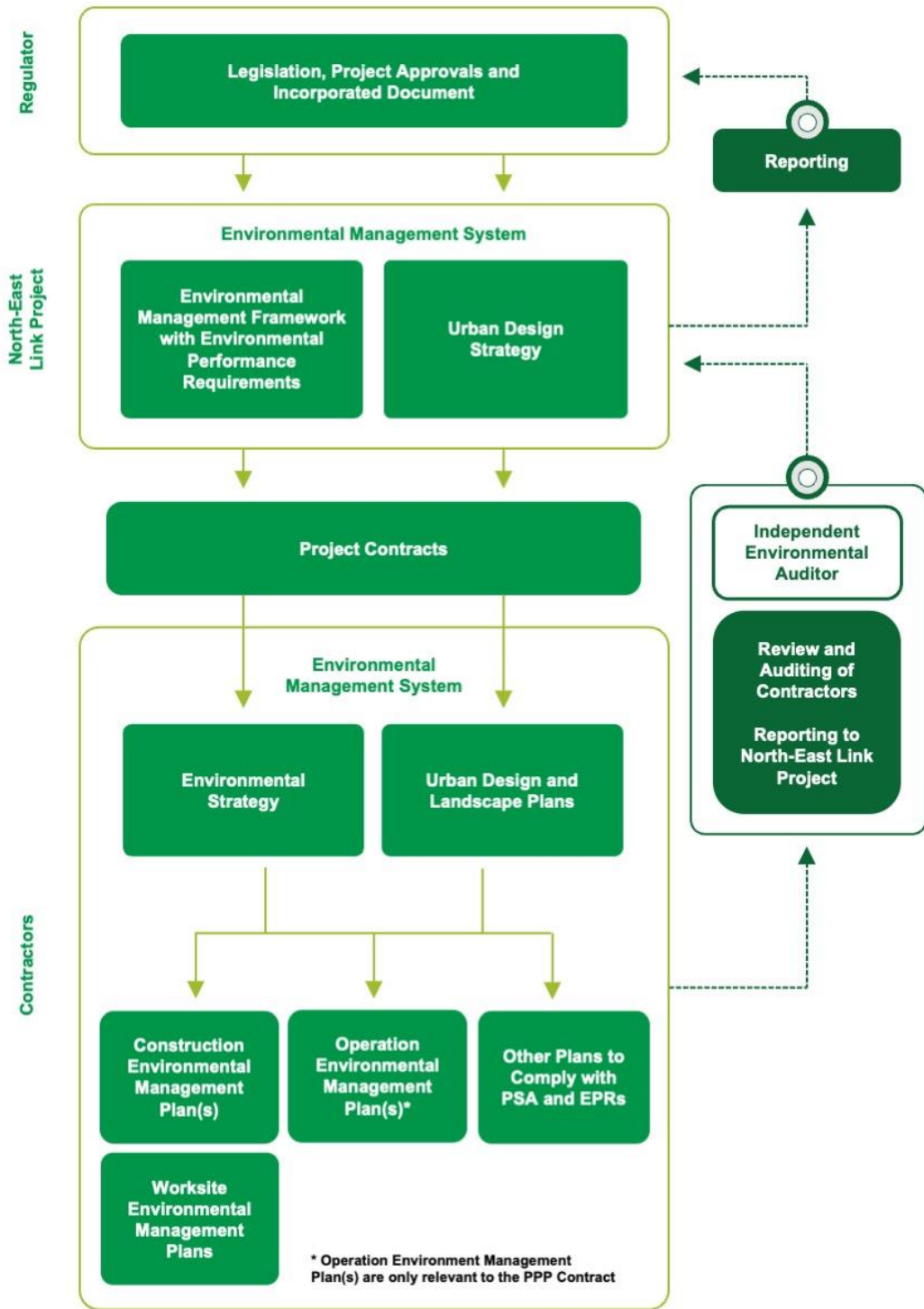


Figure 2: Environmental Documentation

(adapted from the EMF)



2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

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

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

2.3 Requirements of the EMF

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

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

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

2.3.1 Environmental Performance Requirements

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

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



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

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

The requirements applicable to Spark's D&C activities are considered in audit planning. All applicable EPRs are audited, taking a risk based approach, and all EPRs are audited at least once annually. Fifty-nine (59) for which Spark is responsible were audited in the reporting period.

2.4 Spark environmental documentation

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

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



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

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

- WEMPs. These are:
 - Worksite Environmental Management Plan – Ancillary Works (new WEMP replacing the former WEMP – Site Investigations and expanded to include ancillary works such as the Trawalla logistics laydown yard.)
 - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
 - Worksite Environmental Management Plan – Watsonia (new WEMP combining the former WEMP – Watsonia - Northern to Yallambie and WEMP – Watsonia - Yallambie to Blamey)
 - Worksite Environmental Management Plan – Lower Plenty (new WEMP combining the former WEMP– Lower Plenty- Blamey to Drysdale and WEMP – Lower Plenty - Drysdale to Lower Plenty Road)
 - Worksite Environmental Management Plan – Manningham (new WEMP combining the former WEMP – Manningham and WEMP - Bulleen Industrial Zone Demolition)
 - Worksite Environmental Management Plan – Bulleen (new WEMP combining the former WEMP – Bulleen and WEMP – Bulleen – Southern Road Diversion).
- CCPs. These are:
 - Watsonia Construction Compound Plan – Vent Office Compound
 - Watsonia Construction Compound Plan – TBM Compound
 - Watsonia Construction Compound Plan – Civil and Roads Compound
 - Lower Plenty Construction Compound Plan – Structures Compound
 - Lower Plenty Construction Compound Plan – Mobilisation Compound
 - Manningham Construction Compound Plan – Mobilisation Compound
 - Manningham Construction Compound Plan – SEM Compound
 - Manningham Construction Compound Plan – Structural and M&E Compound
 - Bulleen Construction Compound Plan – Civil, Structural and Roads Compound
 - Bulleen Construction Compound Plan – Cut and Cover and SEM Compound
 - Winsor Reserve Construction Compound Plan – Spoil Handling Facility
 - Boral Batch Plant Construction Compound Plan.

2.5 Role of the Independent Environmental Auditor

The EMF requires an IEA be appointed to undertake reviews of the environmental documentation, and environmental audits of compliance with the documentation required by the Incorporated Document, the



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

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



3 Audit activities

3.1 Environmental documentation verification

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

3.2 Audit program

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

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

3.3 Audit conduct

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

For audits of Spark D&C each audit includes:

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



Figure 3: Audit process

3.4 Audit objectives, scope, and criteria

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

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

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



Table 1: Summary audit scope

| Key Documents | Nov 23 (Monthly) | Dec 23 (Quarterly) | Feb 24 (Monthly) | Mar 24 (6-Monthly) | Apr 24 (Monthly) |
|---|---------------------|------------------------------|---|--------------------------------|---------------------|
| EPRs (as scheduled) | | ✓ | | ✓ | |
| Environmental Strategy | | | | ✓ | |
| Construction Environmental Management Plan | | ✓ (key elements) | | ✓ (all applicable elements) | |
| Management Plans required by the EPRs | | ✓ | ✓ (GWMP monitoring & reporting requirements) | ✓ | |
| Worksite Environmental Management Plans (WEMPs) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Construction Compound Plans (CCPs) | | ✓ (CCP-0010 and CCP-0012) | ✓ (CCP-0002) | | |

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

3.5 Construction activities during the reporting period

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

Table 2: Construction activities during the reporting period.

| Audit date | Construction activities |
|---------------|---|
| November 2023 | <ul style="list-style-type: none"> • Site establishment and civil works • Installation of the Boral Batch Plant • Clearing and grubbing including tree removal • Piling, D-Walling, and concrete pours • Spoil shed installation • TBM assembly works • Excavation and spoil removal • Trinity Lake back filling • Traffic management • Winsor Reserve civil works and installation of the spoil shed • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plant at Trinity North and Trinity South • Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard. |
| December 2023 | <ul style="list-style-type: none"> • Site establishment and civil works • Installation of the Boral Batch Plant |



| Audit date | Construction activities |
|---------------|--|
| | <ul style="list-style-type: none"> • Clearing and grubbing including tree removal • Piling, D-Walling, and concrete pours • Excavation and spoil removal • TBM assembly works • Ongoing spoil shed installation • Traffic management • Winsor Reserve civil works and installation of the spoil shed • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plants • Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard. |
| February 2024 | <ul style="list-style-type: none"> • Site establishment and civil works • Installation and operation of the Boral Batch Plant • Clearing and tree removal • Piling, D-Walling, and concrete pours • Excavation and spoil removal • TBM assembly works • Traffic management • Winsor Reserve civil works and installation of the spoil shed • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plants • Storage of plant and equipment, and steel fabrication works at the Trawalla logistics yard. |
| March 2024 | <ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Excavation and spoil removal • TBM assembly works • Operation of the Boral Batch Plant • Traffic management • Winsor Reserve civil works and installation of the spoil shed • Drilling of geotechnical and groundwater investigation bores • Installation and maintenance of environmental controls including water treatment plants • Storage of materials, plant, and equipment at the Trawalla logistics yard. |
| April 2024 | <ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Excavation and spoil removal • Tree clearing and removal at River Gum Walk as part of the Eel Bridge installation • TBM assembly works |



Audit date

Construction activities

-
- Operation of the Boral Batch Plant
 - Traffic management
 - Winsor Reserve civil works and installation of the spoil shed
 - Drilling of geotechnical and groundwater investigation bores
 - Installation and maintenance of environmental controls including water treatment plants
 - Storage of materials, plant and equipment at the Trawalla logistics yard.



4 Audit outcomes

4.1 Audit findings classifications

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

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

4.1.1 Significance of audit findings

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

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

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



4.2 Overall audit findings

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

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

Table 3: Total audit findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 5 | 6 | 6 | 5 |
| Afl | 14 | 25 | 29 | 10 |
| O | 7 | 19 | 20 | 6 |
| Total | 26 | 50 | 55 | 21 |

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

A total of fifty (50) audit findings were raised comprising six (6) Non-compliances, twenty-five (25) Areas for Improvement, and nineteen (19) Observations.

Most of the audit findings were raised in the December 2023 quarterly audit, which assessed compliance against the requirements of most of Spark’s environmental documentation (see Figure 4).

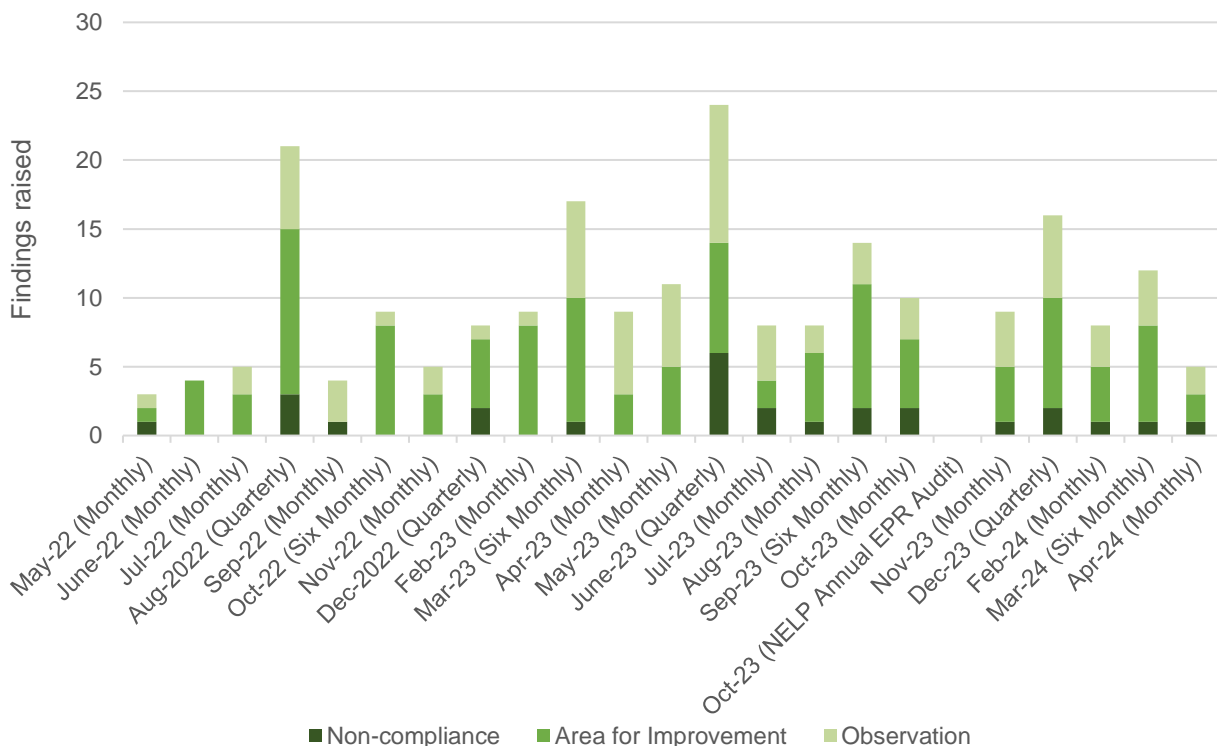


Figure 4: Audit findings by type and audit date (Project commencement to April 2024)



Spark D&C established corrective actions to address audit findings. Fifty-five (55) findings were closed during the reporting period. Twenty-one (21) findings remained open at the end of the reporting period. (See Figure 5).

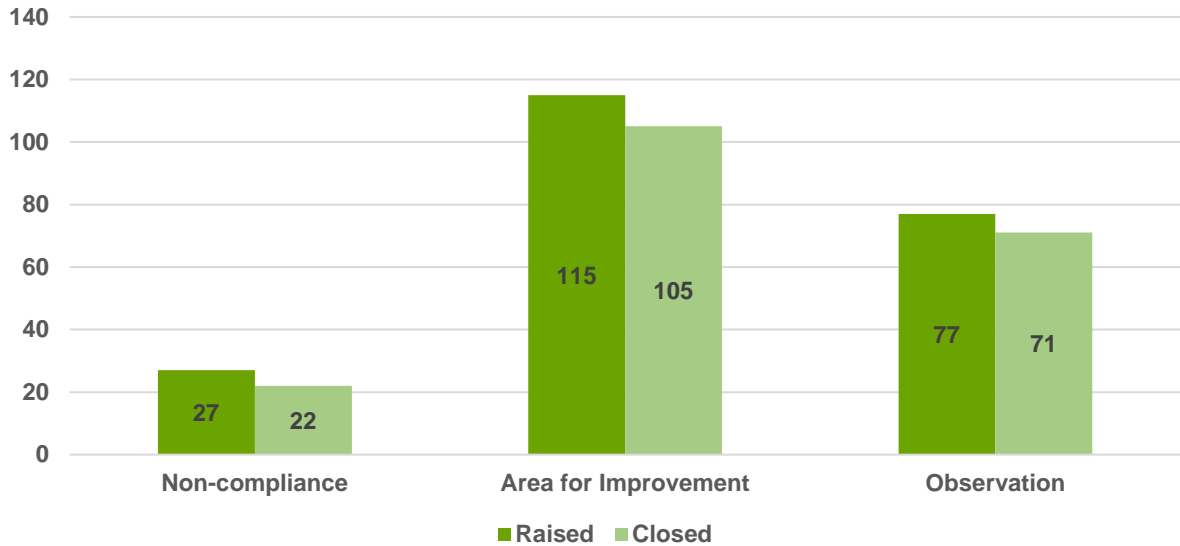


Figure 5: Cumulative audit findings raised and closed - Project commencement to April 2024

4.3 Compliance with the Incorporated Document

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

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

4.4 Compliance with Environmental Performance Requirements

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

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

Two (2) findings were raised against the requirements of the EPRs, both Areas for Improvement (see Table 4).

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



Table 4: Summary of EPR audit findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|---------------------|--|---|---|--|
| N | 0 | 0 | 0 | 0 |
| Afl | 1 | 2 | 1 | 2 |
| O | 1 | 0 | 1 | 0 |
| Total | 2 | 2 | 2 | 2 |

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

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

Figure 6 shows the distribution of EPRs in each of the categories noting which were audited, and the status of compliance for the reporting period. Only EPRs relevant to the design and construction underway during the reporting period were included in the audit schedule for the period. Further, not all EPRs have equally detailed requirements, and there are different numbers of EPRs in each EPR category. The number of EPRs audited does not directly reflect the relative weight of environmental management requirements.

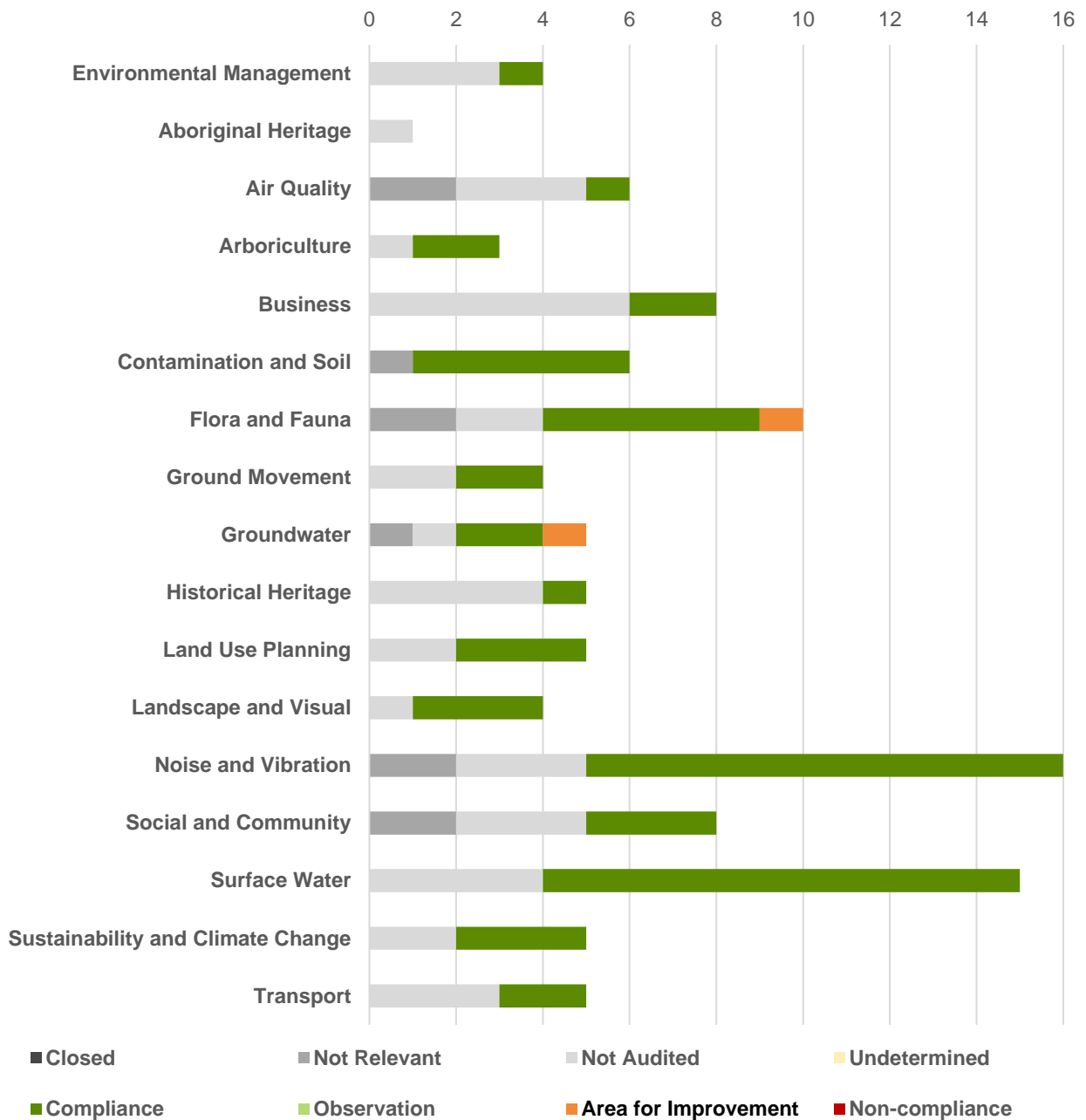


Figure 6: EPR audit findings by EPR category November 2023 to April 2024

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

4.5 Implementation of the Environmental Strategy

The implementation of the Environmental Strategy was audited in March 2024. One new finding was raised relating to resourcing of the Project Co environment role (see Table 5).



Table 5: Environment Strategy audit findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 0 | 0 | 0 | 0 |
| Afl | 0 | 1 | 0 | 1 |
| O | 0 | 0 | 0 | 0 |
| Total | 0 | 1 | 0 | 1 |

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

4.6 Implementation of the Construction Environmental Management Plan

An audit of the selected key elements of the CEMP was conducted in December 2023, and an audit of all applicable elements was conducted in March 2024. Eight (8) new audit findings were raised comprising two (2) Non-compliances, four (4) Areas for Improvement, and two (2) Observations. The findings were largely process related and did not present a direct risk to the environment.

A summary of the audit findings is given below.

Table 6: CEMP audit findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 1 | 2 | 3 | 0 |
| Afl | 2 | 4 | 3 | 3 |
| O | 2 | 2 | 2 | 2 |
| Total | 5 | 8 | 8 | 5 |

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

Eight (8) previous audit findings were closed; three (3) Non-compliance, three (3) Areas for Improvement, and two (2) Observations. Five (5) findings remained open.

4.7 Implementation of the Worksite Environmental Management Plans

The WEMPs applicable to the works underway were audited each month during the reporting period. Thirty-two (32) findings were raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, seventeen (17) Areas for Improvement, and thirteen (13) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting increased construction activities, and to process implementation issues.

Spark made good progress in addressing the findings, with thirty-two (32) previous findings closed and eight (8) remaining open (see Table 7).



Table 7: WEMP audit findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 1 | 2 | 1 | 2 |
| Afl | 4 | 17 | 18 | 3 |
| O | 3 | 13 | 13 | 3 |
| Total | 8 | 32 | 32 | 8 |

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

4.8 Implementation of Management Plans

Spark has developed Management Plans to address the environmental management requirements for specific environmental aspects, and to meet the requirements of the EPRs. The applicable elements of the Management Plans were audited in December 2023 and March 2024. Seven (7) new findings were raised during the reporting period; two (2) Non-compliances, one (1) Area for Improvement, and four (4) Observations (see Table 8).

The Non-compliances were raised against the requirements of the CNVMP for inadequate noise mitigation measures for out of hours works, and against the SWMP for an unpermitted off site discharge of water. The other findings related to Project wide inadequate environmental controls, and to insufficient implementation of documented environmental management arrangements.

Table 8: Management Plans findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 3 | 2 | 2 | 3 |
| Afl | 5 | 1 | 5 | 1 |
| O | 1 | 4 | 4 | 1 |
| Total | 9 | 7 | 11 | 5 |

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

4.9 Implementation of Construction Compound Plans

The Construction Compound Plans approved by the Minister were not formally audited in the reporting period. Two open findings were closed.

Table 9: CCPs findings November 2023 to April 2024

| Finding Type | Open at start of Nov 2023 - Apr 2024 period | Raised during Nov 2023 - Apr 2024 period | Closed during Nov 2023 - Apr 2024 period | Open at end of Nov 2023 - Apr 2024 period |
|--------------|---|--|--|---|
| N | 0 | 0 | 0 | 0 |
| Afl | 2 | 0 | 2 | 0 |
| O | 0 | 0 | 0 | 0 |
| Total | 2 | 0 | 2 | 0 |

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



A CCP-related Non-compliance finding was raised against the Manningham WEMP (WEMP-33) as the compound at Manningham North was installed prior to obtaining an approved CCP.



5 Audit conclusions

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

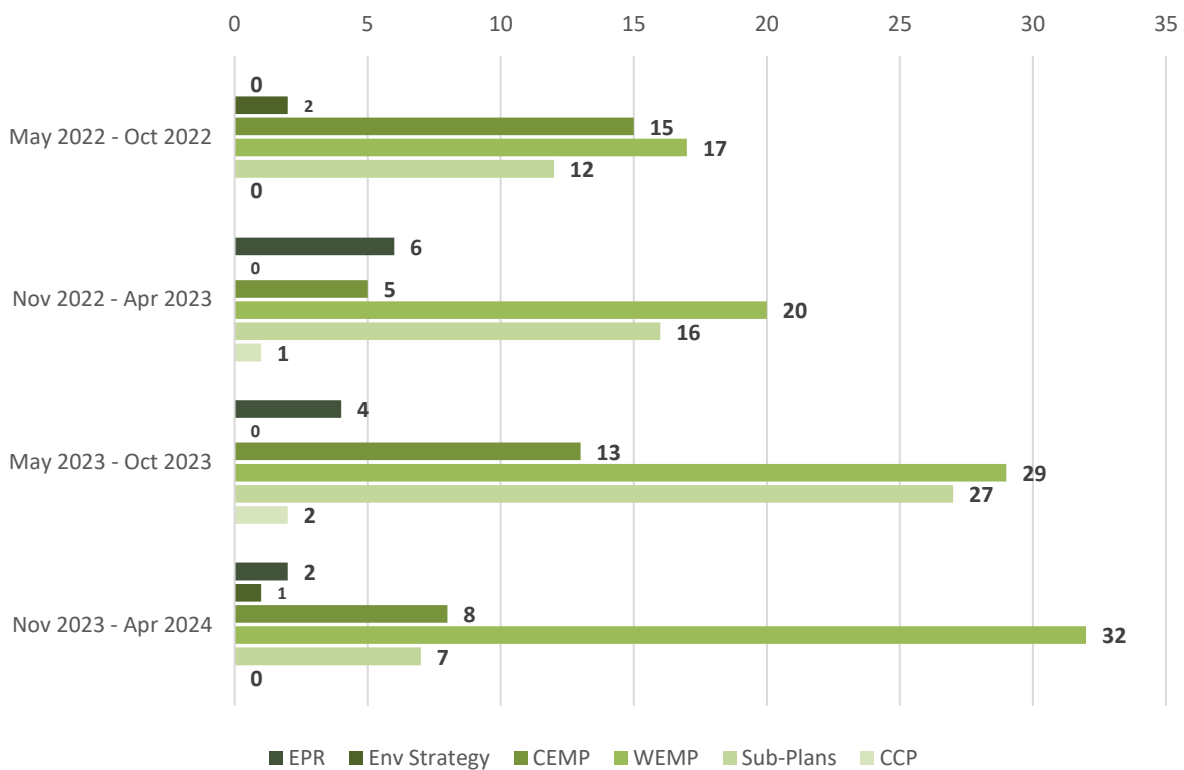


Figure 7: Audit findings by reporting periods

5.1 Compliance with Plans required in the Incorporated Document

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

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



5.2 Compliance with Environmental Performance Requirements

Fifty-nine (59) of the EPRs for which Spark is responsible were audited in the reporting period. Two (2) findings were raised against the requirements of the EPRs; both Areas for Improvement. These findings related to the documented requirements for groundwater management and groundwater dependent ecosystems.

Overall, the requirements of the EPRs were met.

The number of findings raised against EPRs has decreased in successive reporting period since the Nov 2022 – April 2023 period (see Figure 7).

5.3 Implementation of the Environmental Strategy

One new finding was raised against the requirements of the Environment Strategy during the reporting period. No previous findings were open. The Environmental Strategy provides an adequate framework for environmental management.

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

5.4 Implementation of the Construction Environmental Management Plan

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

Eight (8) new findings were raised against the requirements of the CEMP; two (2) Non-compliances, four (4) Areas for Improvement, and two (2) Observations.

In general, the findings were process related and are related to documented environmental management arrangements and do not represent a material risk to the environment. The Non-compliances were related to documenting specific requirements in environmental approvals, and for not reporting breaches of environmental approvals to NELP and the IEA. The remaining findings were largely process related

Eight (8) findings were closed and five (5) remained open at the end of the period.

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

Findings against the CEMP have been raised in each reporting period (see Figure 7). Spark D&C continued to address these findings. Fewer findings were raised in the second reporting period (Nov 2022 to April 2023) as many findings from the previous reporting period remained open. Otherwise, there is a slight reduction in CEMP related findings over time.

5.5 Compliance with the requirements of the Worksite Environmental Management Plans

The WEMPs have been established to meet the requirements on the EMF and the PSDR. However, they remain complex documents for managing site environmental management. Thirty-two (32) findings were



raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, seventeen (17) Areas for Improvement, and thirteen (13) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. One Non-compliance was raised as the water authority had not been notified of a trade waste report within the required timeline, and another for the installation of the Manningham North compound prior to obtaining the required approval.

Thirty-two (32) findings were closed, and eight (8) remained open.

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

The number of findings against the WEMPs has increased in each reporting period (see Figure 7). The rise in WEMP-related findings may correspond with the increased scope and complexity of construction activities. However, the findings also note the need for Spark to further develop commensurate environmental controls. Spark has not demonstrated that these on-ground controls are always effective.

5.6 Compliance with the requirements of the Management Plans

The EMF requires the development and implementation of specific Management Plans. Spark has developed all the plans required for the scope of work undertaken during the reporting period. Seven (7) new findings were raised during the reporting period; two (2) Non-compliances, one (1) Area for Improvement, and four (4) Observations. One Non-compliance related to noise exceedances and associated complaints for Managed Impact works. The other Non-compliance was related to unpermitted dewatering. The remaining findings related to inadequate environmental controls at works areas, and to insufficient implementation of documented environmental management arrangements.

Eleven (11) findings were closed in the reporting period and five (5) remained open.

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

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

5.7 Compliance with the requirements of the Construction Compound Plans

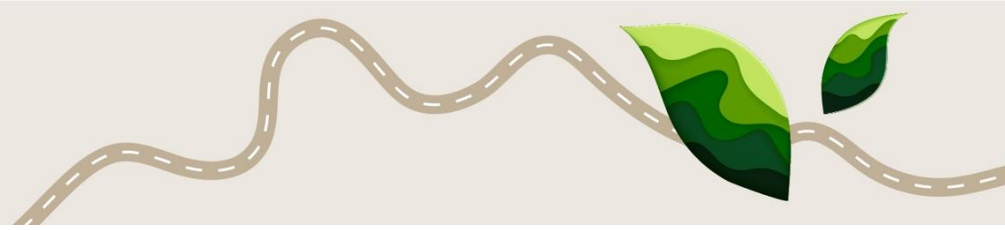
The development of Construction Compound Plans (CCPs) to the satisfaction of the Minister for Planning is required by the Incorporated Document. No new audit findings were raised against the requirements of the approved CCPs. As noted above, a WEMP-related Non-compliance finding was as the compound at Manningham North, was installed prior to obtaining an approved CCP.

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



Appendix 1 – EPRs audited in the reporting period

| Audit date | EPRs audited | |
|---------------|--|---|
| December 2023 | Environmental Management Framework (EMF) | EMF4 |
| | Arboriculture | AR1, AR2 |
| | Business (B) | B4 |
| | Contamination and soil (CL) | CL5 |
| | Flora and Fauna (FF) | FF1, FF2, FF3, FF4, FF8 |
| | Ground Movement (GM) | GM2 |
| | Groundwater (GW) | GW2, GW3, GW4 |
| | Land Use Planning (LP) | LP2, LP3, LP5 |
| | Landscape and Visual (LV) | LV1, LV2 |
| | Noise and Vibration (NV) | NV13, NV14 |
| | Social and Community (SC) | SC1, SC2, SC4 |
| | Surface Water (SW) | SW1, SW4, SW8, SW9, SW10, SW12 |
| March 2024 | Air Quality (AQ) | AQ1 |
| | Business (B) | B5 |
| | Contamination and soil (CL) | CL1, CL2, CL3, CL4 |
| | Flora and Fauna (FF) | FF6 |
| | Ground Movement (GM) | GM4 |
| | Historical Heritage | HH4 |
| | Landscape and Visual (LV) | LV4 |
| | Noise and Vibration (NV) | NV1, NV3, NV6, NV8, NV9, NV10, NV11, NV12, NV15 |
| | Surface Water (SW) | SW3, SW6, SW11, SW14, SW15 |
| | Sustainability and Climate Change (SCC) | SCC3, SCC4, SCC5 |
| | Transport (T) | T1, T4 |



Appendix 2 – Audit findings and summary of actions taken

Audit Findings Raised During the Reporting Period

Table 10: Summary of audit findings against the Environmental Strategy

| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|--------------------------|-------------|
| Dec-23 | IEA-1223-02 | Afl | Environment Strategy 3.3.1 Project Co Leadership Team: The Environment and Sustainability Director role is vacant. | Project Co was in the process of appointing an Environment and Sustainability Director during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Open | |

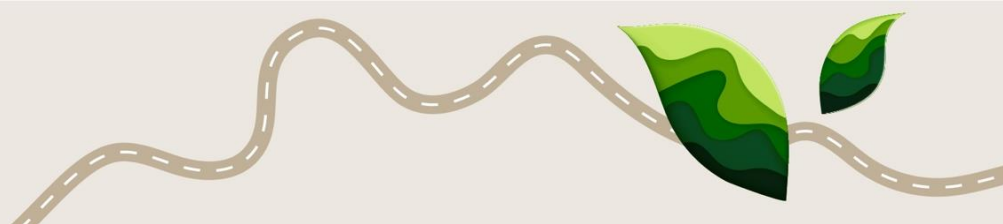


Table 11: Summary of audit findings against the EPRs

| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|---|--|----------------------|-------------|
| Dec-23 | IEA-1223-01 | Afl | EPR GW4: Processes defined in the Groundwater Management Plan have not been fully or effectively implemented including for the submission of stage 2 baselines and trigger levels prior to bulk excavation. Spark has raised internal audit non-conformances with associated action plans. | The GWMP requires revision to reflect implemented processes for groundwater management. This was underway during the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Open | |
| Mar-24 | IEA-0324-01 | Afl | EPR FF6: A monitoring program and mitigation plan for identified GDEs has not yet been fully developed and implemented in accordance with the requirements of FF6. | The GDE monitoring and mitigation plan is to be integrated with the GWMP. This was under development during the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Open | |

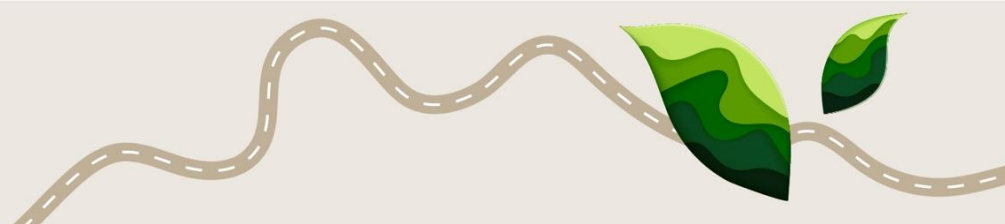
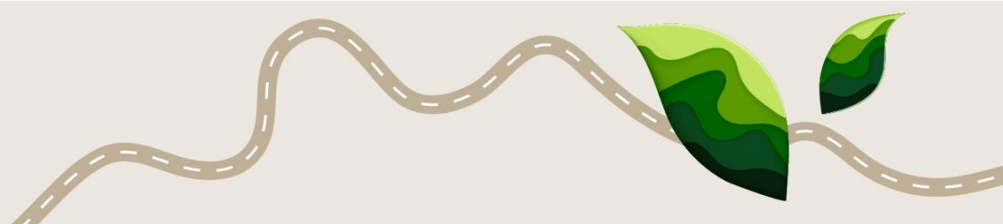
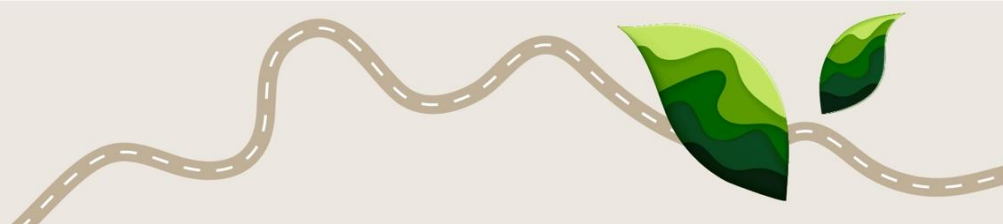


Table 12: Summary of findings against the CEMP

| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|---|---|----------------------|-------------|
| Dec-23 | IEA-1223-03 | Afl | CEMP 4.1 Environmental Requirements Compliance: There is no formalised process for capturing and implementing specific requirements in environmental approvals. | The Spark environmental obligations register has been updated to include relevant requirements of environmental approvals. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Closed | Feb-24 |
| Dec-23 | IEA-1223-04 | N | CEMP 5.5.3 Site Environmental Plans: SEPs do not contain relevant information identified in WEMPs and have not been updated or communicated for current works. | The SEPs have been reviewed and revised and will continue to be updated to reflect relevant works. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Closed | Feb-24 |
| Dec-23 | IEA-1223-05 | O | CEMP 6.5 Environment in Design: Not all utility design packages were listed in the Spark environment design review register. | The design register has been updated to include utility design packages. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Closed | Feb-24 |
| Dec-23 | IEA-1223-06 | N | CEMP 10.3.3.1 Immediate Reporting and notification: Breaches of environmental approvals have not been reported to NELP or the IREA. | The process for reporting breaches of environmental approvals was to be communicated to relevant personnel, but this had not been undertaken in the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Closed | Mar-24 |
| Mar-24 | IEA-0324-02 | Afl | CEMP 4.5.2 Package procedures. Procedure cited in the CEMP and | Spark has updated the CEMP and sub-plans with the relevant Spark procedures. However, the revised CEMP was not verified | Open | |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| | | | sub-plans (such as the MSP28 Monitoring Measurement of Processes and Products in CEMP s9.1 and the MSP22F Noise, vibration and light risk management in CNVMP, MSP22O Authority and Permit to Work) are either not used or not relevant. | by the IREA during the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | | |
| Mar-24 | IEA-0324-03 | O | CEMP 5.3 Sensitive receptors. Sensitive receptors not included in the Environmental Aspects and Impacts register. | Spark has updated the CEMP and sub-plans. However, the revised CEMP was not verified by the IREA during the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Open | |
| Mar-24 | IEA-0324-04 | Afl | CEMP 6.5 Environment in Design. Three Category 1 DPs [1060, 1306 and 1162] did not have appropriate internal review by the environment team. The Environment team were not involved in the categorisation of temporary works DPs. | The Temporary Works procedure was being revised to require that EPRs are to be included in relevant design packages (DP), and the Environment Team to be involved in reviews. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project. | Open | |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| Mar-24 | IEA-0324-05 | Afl | CEMP 9.5.1 Corrective and Preventive Actions: Verification of the effectiveness of actions is not currently formalised. | The establishment of the overarching process to verify effectiveness of corrective actions was still being formalised and not fully implemented across all relevant actions. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Open | |

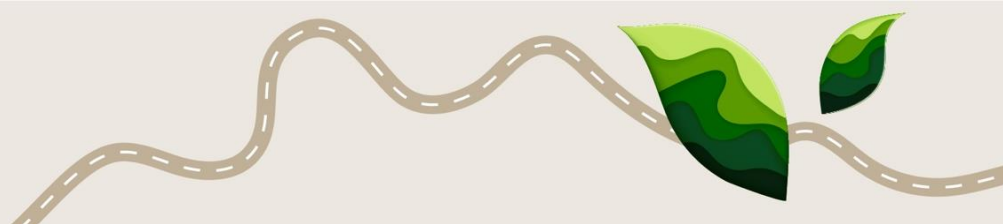
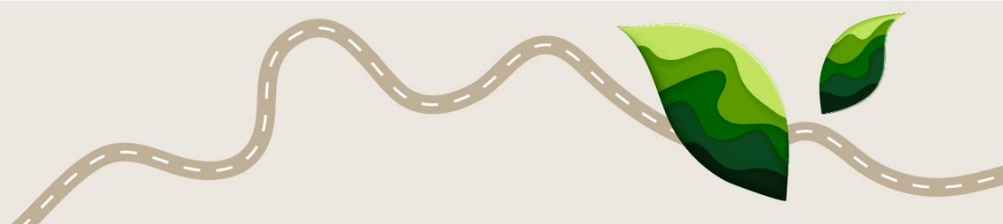
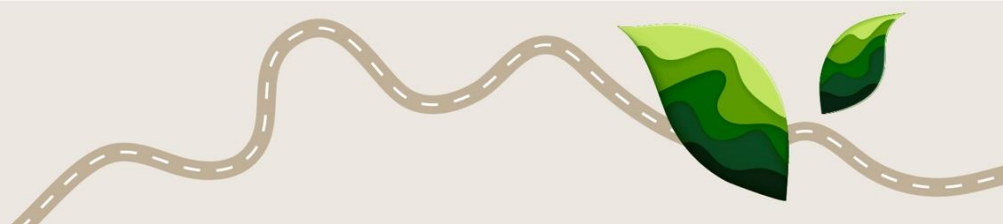


Table 13: Findings raised against the WEMPs

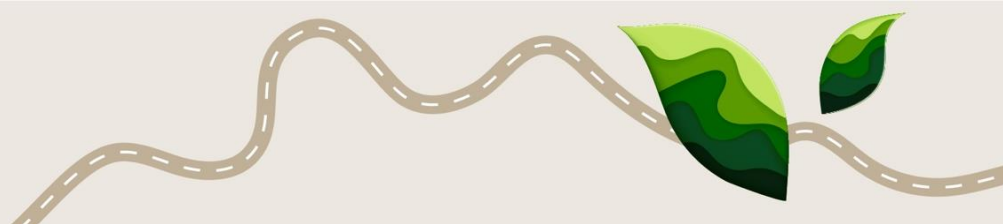
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|--|--|----------------------|-------------|
| Nov-23 | IEA-1123-01 | N | WEMP-31 Watsonia 2 Requirements: Formal notification of the Vent Tunnel TWA pH exceedance to YVW has not met the timelines in the Trade Waste Agreement. | A formal notification to YVW was sighted. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Nov-23 | IEA-1123-02 | Afl | WEMP-31 Watsonia 9 Environmental Aspects - Air Quality: The Watsonia wheel wash had been decommissioned and dust and sediment tracking was observed from the Watsonia Box exit on Greensborough Rd. | The wheel wash has been relocated to the laydown area ahead of its installation at Winsor. In the meantime, street sweeping and water carts are being used at Watsonia Box to prevent sediment tracking leaving Watsonia Box. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Dec-23 |
| Nov-23 | IEA-1123-03 | O | WEMP-31 Watsonia 9 Environmental Aspects – Contamination and Spoil: Minor quantities of mineral oil containers were observed outside the designated and bunded area at Vent Tunnel. | The area was observed to be cleaned and the mineral oil containers were appropriately bunded. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |



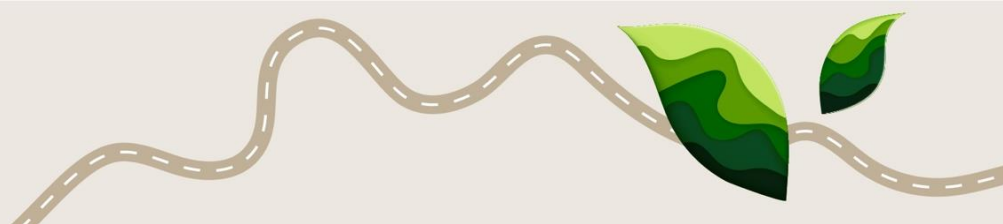
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|---|--|-----------------------|-------------|
| Nov-23 | IEA-1123-04 | O | <p>WEMP-31 Watsonia 9 Environmental Aspects – Contamination and Spoil: Evidence to support the removal of the Watsonia Box weighbridge and replacement with the weigh in motion scales was not provided at audit.</p> | <p>Actions to address this finding is subject to ongoing consultation between Spark and NELP and was not resolved during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p> | Open | |
| Nov-23 | IEA-1123-06 | Afl | <p>WEMP-33 Manningham 9 Environmental Aspects – Arboriculture: The recommendations to manage protected trees, including the Caltex Tree (tree ID 8017) from the quarterly arborist inspection had not been raised as actions in Synergy.</p> | <p>The arborists actions had been implemented and are being tracked in Synergy. This finding related to on site environmental controls and represented a low risk to the environment.</p> | Closed | Feb-24 |
| Nov-23 | IEA-1123-07 | Afl | <p>WEMP-26 9.5 Contamination and Soil: A spill of oil/fuel from generator at Trinity South was observed during site walk</p> | <p>The area around the Trinity South compound generator was observed in the following audit to be cleaned and sealed. This finding related to on site environmental controls and represented a low risk to the environment.</p> | Closed | Feb-24 |
| Nov-23 | IEA-1123-08 | Afl | <p>WEMP-26 9.5 Contamination and Soil: The asbestos stockpile at Manningham (wedge) was not covered.</p> | <p>Following advice from the project hygienist, the stockpile was appropriately managed to minimise risk to human health and the environment prior to its removal from site. This finding related to on site environmental controls and represented a low risk to the environment.</p> | Closed | Dec-23 |



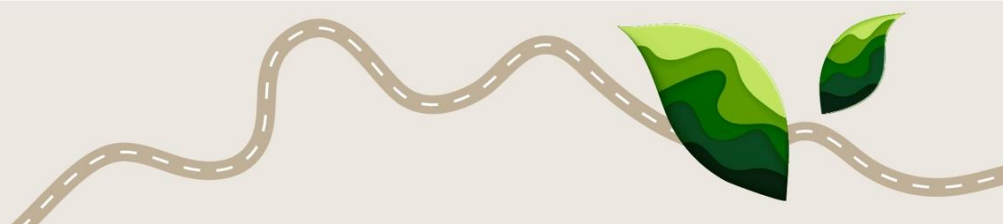
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|---|-----------------------|-------------|
| Dec-23 | IEA-1223-08 | Afl | WEMP-31 2 Key Reference Documents – Secondary Approvals: The change to the Vent Tunnel WTP pH dosing control process was not fully consistent with the approved TWA plumbing arrangements and associated P&ID drawings. | Spark notified Yarra Valley Water of the process instrumentation change. The response received noted that operation of the WTP may continue. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-09 | Afl | WEMP-31 2.3 Requirements – Secondary Approvals: Not all monitoring records for the Smoke Shaft WTP discharge included pH. | Compliance tracking of pH monitoring results has been established in the monitoring register. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-10 | O | WEMP-31 Watsonia 9 Environmental Aspects - Contamination and Spoil: Sulfuric acid containers were observed stored in the Vent Tunnel WTP skid without appropriate secondary containment. | The sulfuric containers were moved to a bunded location. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-11 | O | WEMP-31 Watsonia 9 Environmental Aspects - Contamination and Spoil: A concrete truck washout was observed in a non-designated area and without the use of a concrete wash bag. | The appropriate use of concrete washout bags was presented at a prestart meeting. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |



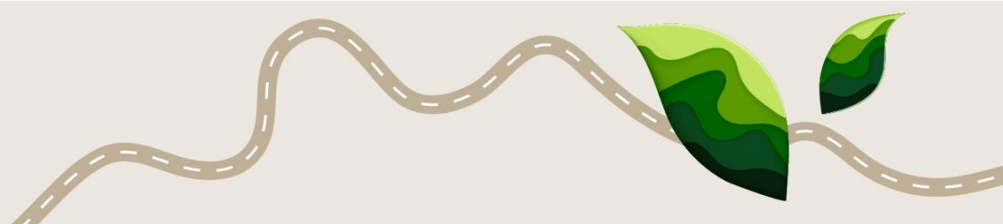
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|---|---|----------------------|-------------|
| Dec-23 | IEA-1223-12 | Afl | WEMP-32 Lower Plenty 9 Environmental Aspects - Air Quality: Dust and sediment tracking was observed on Greensborough Rd from construction vehicles leaving the Lower Plenty site. | Dust controls continued to be tracked by Spark through the weekly inspections. The roads from Lower Plenty were observed in the subsequent IEA audit to be free of sediment. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-13 | O | WEMP-32 Lower Plenty 9 Environmental Aspects - Contamination and Spoil: A spoil truck was observed leaving site with a damaged cover. | The Spark spoil team managed the processes with haulage contractors to correct faulty load covers. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Dec-23 | IEA-1223-14 | O | WEMP-32 Lower Plenty 9 Environmental Aspects - Contamination and Spoil: Evidence of an oil spill from the Lower Plenty southern compound generator was observed. | The oil spill was reported and the area cleaned. A toolbox about environmental incident reporting was conducted. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-15 | Afl | WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water Management: A pump (not yet connected to power) and hose were set up to discharge pooled rainwater from a bund to stormwater without an approved dewatering permit. | The equipment was removed and the ponded water removed via an NDD truck. Personnel were also reminded of the correct procedure for dewatering. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Feb-24 |
| Dec-23 | IEA-1223-16 | Afl | WEMP-33 Manningham 9 Environmental Aspects – Air | The wheel wash at Manningham was subsequently operational and additional road ballast added to minimise dust. A new sealed car park was also in use. | Closed | Feb-24 |



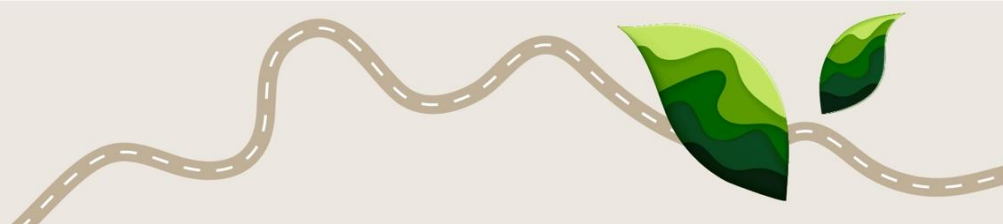
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|---|-----------------------|-------------|
| | | | Quality: Dust Tracking was observed on Manningham Road. | This finding related to on site environmental controls and represented a medium risk to the environment. | | |
| Feb-24 | IEA-0224-02 | Afl | WEMP 32 Lower Plenty 9 Environmental Aspects – Contamination and Spoil: Chemicals and paint tins were stored outside the bunded area at the Traffic Team laydown area at Lower Plenty. | Chemicals and paint tins were subsequently observed to be correctly stored in the Traffic Team laydown area at Lower Plenty. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Feb-24 | IEA-0224-03 | Afl | WEMP 32 Lower Plenty 9 Environmental Aspects – Contamination and Spoil: Minor diesel spills were observed at the refuelling points of two generators at Lower Plenty and Vent Tunnel sites. | The spill event was reported in Synergy and the area cleaned. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Feb-24 | IEA-0224-04 | Afl | WEMP-32 Lower Plenty 9 Environmental Aspects - Surface Water Management: Plumbing at the site huts at corner of Greensborough Road and Lower Plenty Road has not been connected in accordance with the approved design. This includes roof water plumbed to trade waste without metering, and boot wash draining to the refuelling point of site generator. | Plumbing at the Lower Plenty compound has been checked, modified and labelled. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |



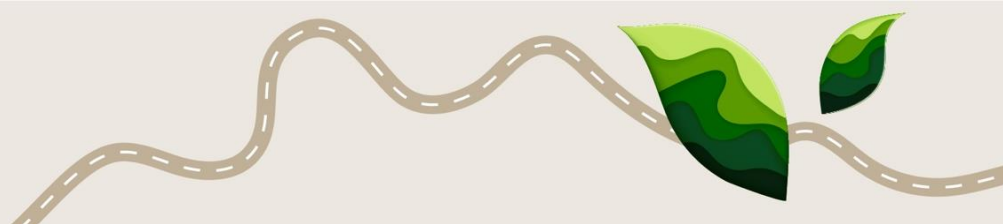
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|--|--|----------------------|-------------|
| Feb-24 | IEA-0224-05 | N | WEMP-33 Manningham 2.3 Key Approvals: Construction compound huts were installed at Manningham north without an approved CCP. | The CCP had not been approved by the Minister for Planning during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Open | |
| Feb-24 | IEA-0224-06 | O | WEMP-33 Manningham 9 Environmental Aspects - Contamination and Soil: The asbestos contaminated stockpile at Manningham (near BAAG) was not managed in accordance with the requirements of the Spoil Management Plan or the SEP. | Following advice from the project hygienist, the stockpile was appropriately managed to minimise risk to human health and the environment prior to its removal from site. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Feb-24 | IEA-0224-07 | O | WEMP-33 Manningham 9 Environmental Aspects – Noise and Vibration: Hoarding was not installed along the Bulleen Road boundary between the newly sealed car park and the spill-over car park as per design report NEL-CNT-PSH-2990-CFN-DPK-1009 Project Wide – Fencing and Hoardings. | Concrete barriers were fitted with gawk screens along the former car park as per the design report. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Feb-24 | IEA-0224-08 | O | WEMP-34 Bulleen 9 Environmental Aspects – Noise and Vibration: Hoarding was not installed along the old Bulleen Rd alignment and Marcellin College as per design report NEL-CNT-PSH- | Concrete barriers were fitted with screens displaying information about Marcellin College along the old Bulleen Road. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| | | | 2990-CFN-DPK-1009 Project Wide – Fencing and Hoardings. | | | |
| Mar-24 | IEA-0324-08 | O | WEMP – 32 Lower Plenty – 9 Environmental Aspects – Surface Water: Drainage for the boot wash at the Lower Plenty compound is plumbed to the base of the diesel generator refuelling area with previously observed spill history. | The drainage plumbing for the boot wash was observed to bypass the diesel generator. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Apr-24 |
| Mar-24 | IEA-0324-09 | Afl | WEMP-33 Manningham 9 Environmental Aspects - Surface Water Management: Erosion and sediment controls were not fully effective in Area 1 at Manningham Road. This included controls at the 1950 mm stormwater drain installation work area, and the Manningham Road northbound diversion road works. | Sediment controls along the Manningham Rd diversion and near the 1950 mm drain works had been installed and maintained. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Apr-24 |
| Mar-24 | IEA-0324-10 | Afl | WEMP-33 Manningham 9 Environmental Aspects – Surface Water Management: Mud tracking was observed on Bridge Street associated with construction vehicles departing the Manningham North site. | Bridge Street had been swept with no adverse mud tracking observed. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Apr-24 |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| Mar-24 | IEA-0324-11 | O | WEMP-34 Bulleen 9 Environmental Aspects - Noise and Vibration: An attended noise monitoring record in the monitoring register had been incorrectly labelled as compliant but the measured level was above the predicted level. | The register has been automated to establish the compliance status based on the noise measurements. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Apr-24 |
| Mar-24 | IEA-0324-12 | Afl | WEMP-34 Bulleen 9 Environmental Aspects - Surface Water Management: Mud tracking was observed on Bulleen Road associated with construction vehicles departing the Trinity North, Trinity South and Bulleen SRD sites. | Evidence of continued mud tracking on Bulleen Road was observed during the following audit. This finding related to on site environmental controls and represented a medium risk to the environment. | Open | |
| Apr-24 | IEA-0424-02 | Afl | WEMP-20 Winsor Reserve Spoil Shed 9 Environmental Aspects – Surface Water Management: Stormwater entering drains and discharge from drainage pits at the Winsor Reserve spoil shed were not fully controlled. This included the lack of protection of external pits near the weighbridge and truck wheel wash bay, and the observed seepage from the large collection pit | Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a low risk to the environment. | Open | |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| | | | in the southwest corner outside the WTP. | | | |
| Apr-24 | IEA-0424-03 | O | WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water Management: Mud tracking from vehicles leaving Lower Plenty observed on northbound Greensborough Road lanes. | Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment. | Open | |
| Apr-24 | IEA-0424-04 | Afl | WEMP-34 Bulleen 4 Working Hours: It was unclear from the GateWave and CNVIA reports how noise limits for avoidable OOHW permits, including associated triggers in B&K noise loggers have been set and were being managed. | Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment. | Open | |
| Apr-24 | IEA-0424-05 | O | WEMP-34 Bulleen 9 Environmental Aspects – Surface Water Management: A dewatering permit was issued in the Civillo Permit System after the permitted activity was approved and completed. | Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a low risk to the environment. | Open | |

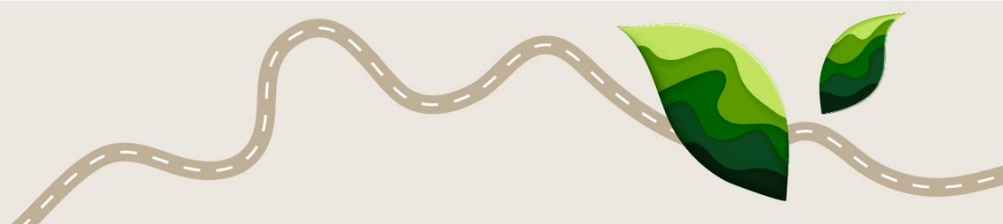
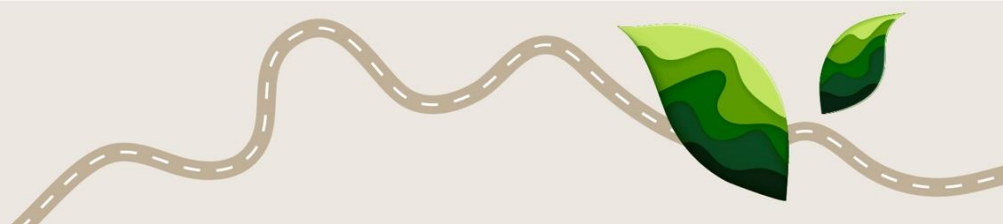
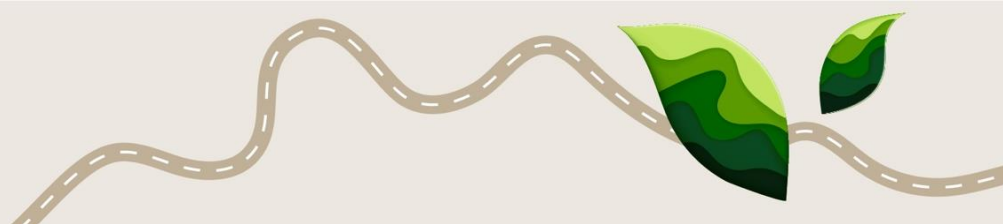


Table 14: Findings raised against the Management Plans

| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|--|--|----------------------|-------------|
| Nov-23 | IEA-1123-05 | O | Spoil MP 8.3 Stockpile Management: Not all stockpiles had signage installed with corresponding stockpile ID and classification. | Photographs showing that stockpiles had signage installed were provided. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Nov-23 | IEA-1123-09 | O | EMMP 5.3.1 Attended Monitoring: Attended monitoring records for the South had not been managed in accordance with the Environmental Monitoring Procedure. | Monitoring spreadsheets had been managed in accordance with the requirements of the Environmental Monitoring Procedure. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Dec-23 | IEA-1223-07 | O | CCEMP 4.3.3 Complaints Management Process: The OOH permit 589 for TBM Assembly was not listed in the OOHW permit register used by the Comms Team to inform responses to complaints outside of normal hours. | The register has been updated and the OOHW permit tracked. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Feb-24 | IEA-0224-01 | Afl | GWMP Section 14 Reporting: Reporting of groundwater information is not fully in accordance with the requirements documented in the GWMP including but not limited | The GWMP remains under review. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Open | |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|---|---|-----------------------|-------------|
| | | | to, provision of monthly factual data, RFIs and reports to NELP and IREA. It is noted that some information is provided to NELP and IREA at the weekly MAT meetings. | | | |
| Mar-24 | IEA-0324-06 | N | CNVMP 8.3 Controls for Avoidable Works During Evening/Night-time – Works at Lower Plenty breached the conditions of a Managed Impacts OOH works permit. Noise exceedances were recorded and verified complaints were received. Works were not ceased as required. The previous night works had also breached the conditions of the Managed Impacts OOH works permit. | Spark is undertaking a review of managed impact works and noise mitigation. Actions and recommendations were not finalised or implemented during the reporting period. This finding related to on site environmental controls and represented a high risk to the environment. | Open | |
| Mar-24 | IEA-0324-07 | O | SWMP 9.1.4 Surface water dewatering criteria – The dewatering and discharge permit does not include clear checks for litter and other pollutants or visual sheen as per the Victorian Stormwater Committee’s Best Practice | The dewatering and discharge permit is to be revised. This was not completed in the reporting period. This finding related to on site environmental controls and represented a low risk to the environment. | Open | |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| | | | Environmental Management Guidelines for Urban Stormwater. | | | |
| Apr-24 | IEA-0424-01 | N | SWMP 7.1 Water Quality Control Measures: Controlled unpermitted discharge of water from Winsor Reserve spoil shed was observed. | Actions to address this finding were not implemented during the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment. | Open | |

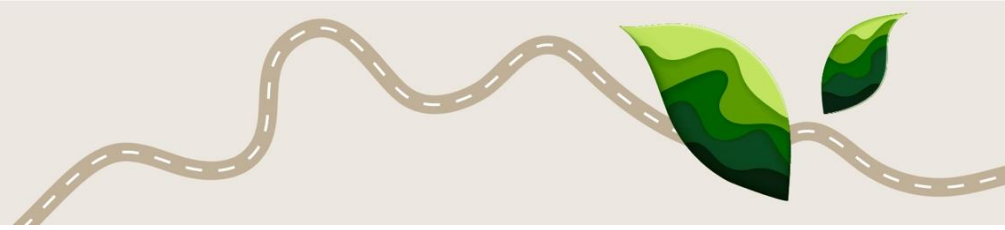


Table 15: Findings raised against the CCPs

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

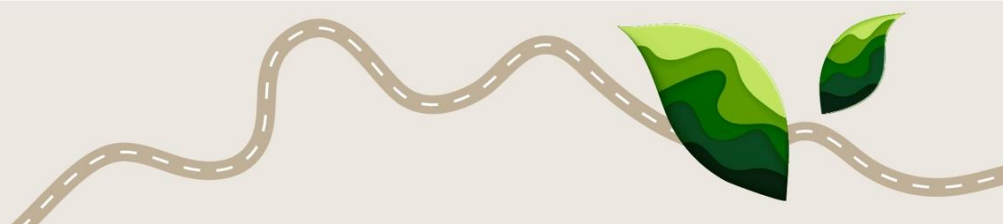
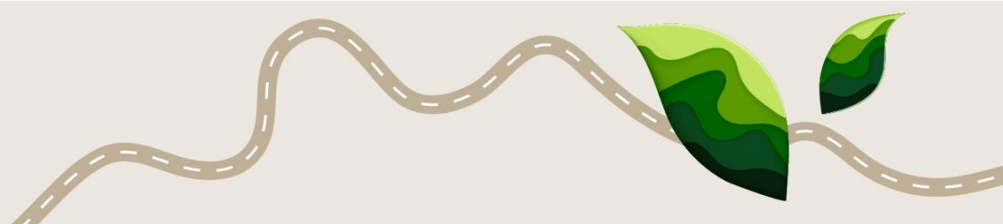
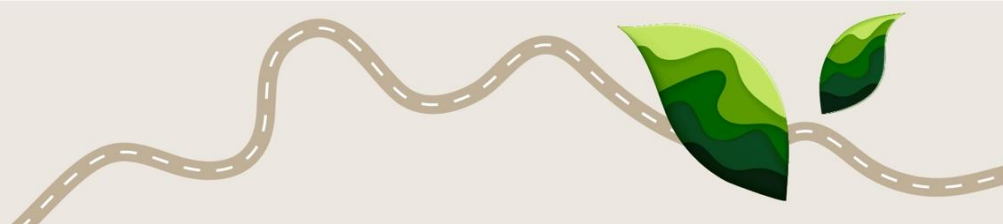


Table 16: Previous open audit findings

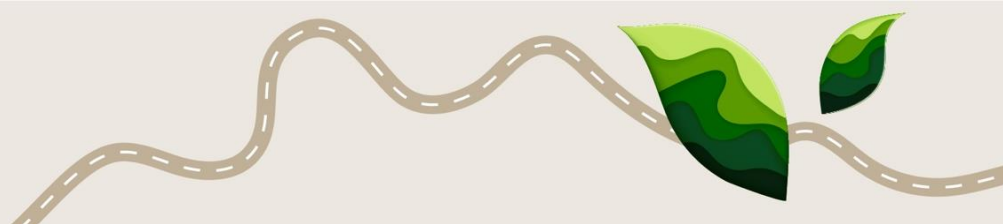
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|---|---|----------------------|-------------|
| Mar-23 | IEA-0323-02 | O | EPR FF8: Mitigation measures to minimise noise and vibration impacts on Australian Grayling are not clearly documented within Spark's management systems. It is noted that impacts are largely avoided by the current design and location of works however this is not clearly captured. Selection of work methods, avoiding activities that may generate intense noise and vibration, with respect to FF8 are not clearly documented. | Spark received a report from its consultants noting no vibration impacts from the current scope of works. Processes have been established to consider FF8 requirements in the CNVIAs for future works. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Mar-23 | IEA-0323-14 | Afl | IS Rating Plan 3.1.3 Credits progressed. Wat-1: Water consumption and savings data are not clearly quantified. | Most data required to track water use are now available. Some data are still to be obtained to develop the forward forecast. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Closed | Dec-23 |
| May-23 | IEA-0523-09 | Afl | WEMP-26 Bulleen 10 Monitoring and Compliance: The water quality monitoring spreadsheet for the South could not clearly demonstrate compliance with dewatering permit conditions. A number of record keeping errors were present in the dewatering | The monitoring procedure has finalised and issued for use. The procedure covers all types of monitoring including dewatering requirements. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Nov-23 |



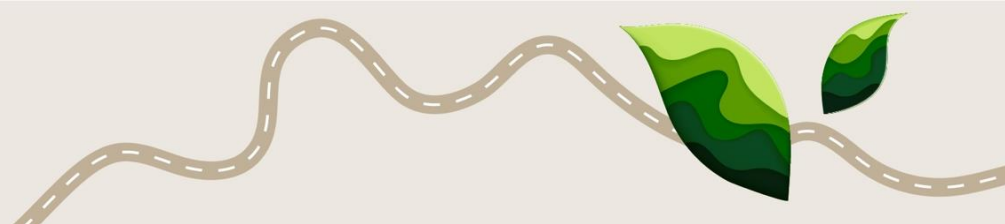
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|---|--|-----------------------|-------------|
| | | | monitoring records spreadsheet. This included incorrect dewatering permit (PTD 54) listed against the water quality results, unclear descriptors of the monitoring location, and dewatering times not clearly recorded. The current dewatering permit (PTD 66) did not have an expiry date recorded on the issued permit. | | | |
| Jun-23 | IEA-0623-05 | N | CEMP 5.5 Project Plans Use of the laydown site at Thomastown has commenced without established environmental management. | WEMP-18 has been revised and issued as Rev 3, dated 8 Feb 2023 to cover all ancillary works including site investigations, works outside the project boundary, and the laydown area at Thomastown. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Feb-24 |
| Jun-23 | IEA-0623-06 | O | CEMP 9.2.2 Digital tools. Digital augmented reality tools have not been implemented. | Spark has updated the CEMP. However, the revised CEMP was not verified by the IREA during the reporting period. This finding related to documented environmental management arrangements did not represent an immediate material risk to the environment. | Open | |
| Jun-23 | IEA-0623-15 | N | Green Infrastructure MP: Not all processes and commitments documented in the GIMP have been implemented or established to integrate with other relevant EPR management plans. | The GIMP has been revised and issued for use. This finding related to documented environmental management arrangements did not represent an immediate material risk to the environment. | Closed | Feb-24 |



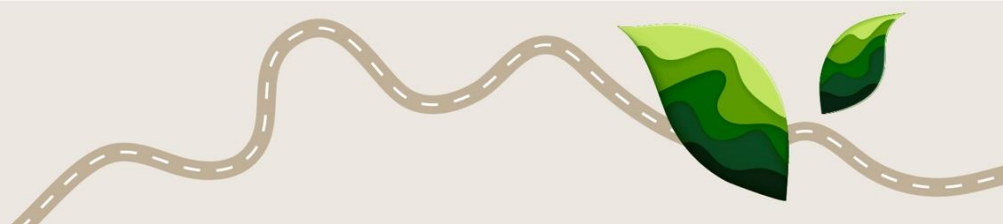
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/Closed) | Date Closed |
|------------|-------------|--------------|--|---|----------------------|-------------|
| Jun-23 | IEA-0623-19 | O | Spoil MP 8.11.1.1 Odour Management: Odour management procedures have not been established as described in the plan. | An updated Spoil MP was verified by IREA and issued as IFU. This finding related to documented environmental management arrangements did not represent an immediate material risk to the environment. | Closed | Dec-23 |
| Jun-23 | IEA-0623-20 | N | Spoil MP 10.5 Reporting: Monthly spoil summary report does not contain all relevant information as required by the PSDR. For example, certified weighbridge dockets are missing. | Spark has established a new monthly reporting process, but this has not yet been formally adopted. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | Open | |
| Sep-23 | IEA-0923-01 | Afl | EPR CL5: Processes for the management of chemicals and other hazardous substances including approval for use, risk assessments and inclusion on inventories, was not always implemented as described. | A specialist consultant was engaged to assist with level of conformance regarding ongoing management of chemicals and hazardous substances. ChemAlert is in use for chemicals management. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |
| Sep-23 | IEA-0923-03 | O | CEMP 6.5 Environment in design: Risks to prioritise the review of design packs for EPR compliance had not been assigned to all design packs listed in the EPR tracker as per the CEMP requirement. | All Design Packages now have risk ratings. This finding related to documented environmental management arrangements did not represent an immediate material risk to the environment. | Closed | Nov-23 |
| Sep-23 | IEA-0923-04 | Afl | CEMP 11.3 Management review: The management review conducted in September 2023 has | The Management Review has been shared and discussed with the Spark Environment Team and the outcomes for continual improvement were noted. Actions generated from the workshop | Closed | Nov-23 |



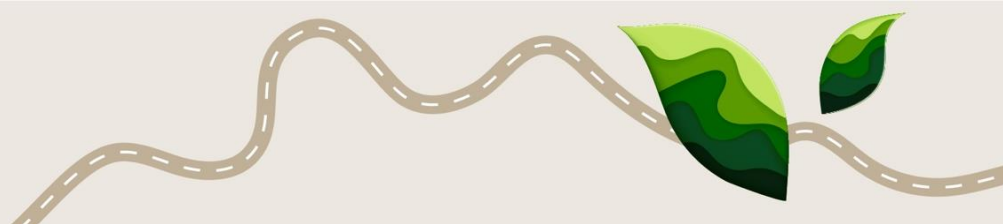
| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
|------------|-------------|--------------|--|--|-----------------------|-------------|
| | | | not yet been shared with all relevant senior management or documented the review outcomes including the continuing suitability, adequacy and effectiveness of the environmental management processes, as per the requirements of the CEMP and ISO 14001 element 9.3. | have now been recorded. A template for Management review minutes has been developed to map ISO 14001 requirements. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment. | | |
| Sep-23 | IEA-0923-07 | Afl | Spoil 8.3 Stockpile Management: The large fill material stockpile at Manningham was not appropriately stabilised. | Polymer was used to reduce the possibility of dust generation from the active stockpile. Much of the material has been removed and used. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Nov-23 |
| Sep-23 | IEA-0923-08 | Afl | Surface Water MP 6.3.3.1 Wastewater management: Inconsistencies in the processes that prescribe the controlled discharge of non-construction or construction water from site were noted in the SWMP, EMMP and the Dewatering and Discharge Procedure. | The processes in an updated Dewatering and Discharge Procedure were consistent with the SWMP and the EMMP. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Mar-24 |
| Sep-23 | IEA-0923-10 | Afl | SWMP 9.1.4 Surface Water Dewatering criteria: : Controlled discharge of non-construction water sourced from the Trinity Wetland (which is located | Spark has clarified the discharge process for non-construction water in the discharge procedure was being drafted. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Nov-23 |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
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| | | | upstream of the project area) did not fully meet the ERS for electrical conductivity. | | | |
| Sep-23 | IEA-0923-13 | Afl | CCP 0011 Winsor Reserve Spoil Handling Facility 3.8 Management of Impacts: Hoarding installed along the south-west boundary exceeds the 6m height identified in the CCP | Agreement was reached with affected stakeholders to reduce the hoarding height by 2 m to the original height as noted in the CCP. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Sep-23 | IEA-0923-14 | Afl | CCP 0004 Lower Plenty Structures Compound 3.1 Compound: The buildings (site huts and ablutions) for the Lower Plenty Mini-Compound are outside area identified in the CCP maps. | Revision 2 of the CCP was approved by the Minister for Planning on 11 Dec 2023. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Dec-23 |
| Oct-23 | IEA-1023-01 | Afl | WEMP-20 9.11 Landscape and Visual: Construction related debris and litter was observed in the publicly accessible area of Winsor Reserve. | The area behind the Spoil Shed had been cleaned and was free of debris. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-02 | N | WEMP-20 9.16 Traffic and Transport: Project cars were observed parked in no project parking areas on Somers Avenue. | The TMP and CCEMP require revision to reflect actual parking restrictions. Review of the TMP and CCEMP was ongoing during the reporting period. This finding related to on site environmental controls and represented a low risk to the environment. | Open | |
| Oct-23 | IEA-1023-03 | Afl | WEMP-24 9.14 Surface Water: Water with slightly elevated turbidity from the Lower Plenty | Actions including awareness training on the ERS limits was implemented to confirm discharge meets required levels prior to discharge. | Closed | Nov-23 |



| Audit Date | Finding No. | Finding type | Finding | Actions | Status (Open/ Closed) | Date Closed |
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| | | | Desanding Plant basin was discharged to Banyule Creek on 5 Oct 2023 under permit NEL-PTD-107. | This finding related to on site environmental controls and represented a medium risk to the environment. | | |
| Oct-23 | IEA-1023-04 | Afl | CNVMP 6.6.2 Permit to Work Out of Hours: The Lower Plenty D-wall OOH permit NEL-POH-506 and the noise model had not been updated to include chiselling activity works. | The GateWave model had been updated and added to the permit. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-05 | N | GWMP 10 Baseline Conditions: The stage 2 baseline plan with set groundwater levels and trigger levels for individual monitoring wells had not been submitted two weeks prior to bulk excavation below the groundwater table at Watsonia as per the process described in the Groundwater Management Plan. | The Stage 2 DCN was submitted. This finding related to on site environmental controls and represented a medium risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-06 | Afl | WEMP-31 2 Requirements: Trade waste discharged from the Smoke Shaft water treatment plant with elevated pH level of 10.3 against a discharge criterion of 10 was not reported in Synergy. | An event was raised in Synergy with actions raised. An interlock has been installed to prevent discharge when it does not meet requirements. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-07 | Afl | CEMP 5.5.3 SEP: Not all items were identified on the SEP maps | The SEPs have been revised and a presentation to site team on SEP requirements undertaken. | Closed | Nov-23 |



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| | | | as defined in CEMP section 5.5.1 (e.g stockpile locations, monitoring locations and type). | This finding related to on site environmental controls and represented a medium risk to the environment. | | |
| Oct-23 | IEA-1023-08 | O | WEMP-27 9.13 Noise and Vibration: A tonal movement alarm was observed at Bulleen SRD. | No tonal alarms were observed in subsequent audits. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-09 | O | WEMP-27 9.14 Surface Water: Not all sediment controls were effectively implemented. | Adequate sediment controls were observed in subsequent audits. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |
| Oct-23 | IEA-1023-10 | O | Trawalla SEP Contamination and spoil: No nearby spill kit at the truck unloading area. | Spill kit had been located near the truck unloading area. This finding related to on site environmental controls and represented a low risk to the environment. | Closed | Nov-23 |



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