



North East Link Program - Freeway
Packages Independent Environmental
Auditor

Six-Monthly Summary Report:

May – October 2024

Report to the Minister for Planning

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Document Approval

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Document review and approval

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0	Final Report		13/02/2025	
01	Final Report in response to MRPV comments		27/02/2025	

Inherent Limitations

This report has been prepared as outlined in the Scope and Approach Section and provides a summary of KPMG's work undertaken over the period May to October 2024 inclusive. KPMG's full detailed findings are contained in respective reports prepared across this period. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and consequently no opinions or conclusions intended to convey assurance have been expressed.

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

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the Major Road Projects Victoria (MRPV), the M80 Ring Road Alliance (M80RRA) and the Eastern Freeway Burke to Tram Road Alliance (EFBTA), consulted as part of the process. KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

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

Third Party Reliance

This report is solely for the purpose set out in the Scope and Approach Section and for MRPV's and the Minister for Planning's information, and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent. This report has been prepared at the request of the MRPV, a division of the Victorian Infrastructure Delivery Authority (VIDA) (an administrative office in relation to the Department of Transport and Planning), in accordance with the terms of KPMG's engagement contract dated 27 June 2023. Other than our responsibility to MRPV and the Minister for Planning, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party's sole responsibility.

Executive Summary

Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that Major Road Projects Victoria (MRPV), which is delivering the NEL Program (NELP) on behalf of the State, provides Six-Monthly Summary Reports as to compliance with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning. This Report presents the NELP Freeway Packages Independent Environmental Auditor (FIEA) Six-Monthly Summary Report covering the period May to October 2024 inclusive (herein referred to as this Reporting Period).

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

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

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

- Audits conducted by the FIEA on activities associated with the Alliances delivering the NELP Freeway Packages (restricted to the North and South Packages for this Reporting Period). The North Package is being delivered by the M80 Ring Road Alliance (M80RRA) and the South Package by the Eastern Freeway Burke to Tram Alliance (EFBTA); and,
- Assessment of corrective actions to close two (2) observations, associated with findings from the November 2023 audit of the relocation of the Indara telecommunications tower at Thompsons Road, Bulleen, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

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

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

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context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this Report.

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

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

Audit Activities

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

The FIEA also conducts additional compliance audits on other packages of work that may arise during delivery of the NELP, including conducting audits on MRPV, which is responsible either in full or partially, for compliance with 18 EPRs that apply on a Project-wide basis. The FIEA is responsible for assessing MRPV's compliance with a number of these Project-wide EPRs, although a Project-wide EPR Compliance Audit was not conducted by the FIEA during this Reporting Period (Note: a Project-wide EPR Compliance Audit was conducted by the FIEA in November 2023, with the next audit scheduled for November 2024).

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

13 Compliance Audits (including a compliance audit at the North Package focussing on erosion and sediment (ERSED) controls under Air Quality and Surface Water EPRs AQ1 and SW5, respectively, one (1) standalone site visit to the South Package focussing on dust controls (under Air Quality EPR AQ1) and one (1) desktop assessment to close out findings associated with the Indara telecommunications tower relocation works, were conducted by the FIEA during this Reporting Period as summarised in Table E.1.

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

Package	May 2024	Jun 2024	Jul 2024	Aug 2024	Sept 2024	Oct 2024	No. of EPRs assessed during Reporting Period
North Package (M80RRA)	EMF and EPR Compliance Audit	Env Perf ¹ Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit; and, ERSED controls Compliance Audit	73 of the 96 relevant/triggered EPRs
South Package (EFBTA)	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit; and, Standalone site visit (dust controls)	65 of the 90 relevant/triggered EPRs
East Package (TBC)²	N/A	N/A	N/A	N/A	N/A	N/A	N/A
West Package (TBC)³	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Project-wide EPRs (MRPV)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Indara Tower Relocation Works	Desktop assessment	N/A	N/A	N/A	N/A	N/A	Two (2) EPRs - Closure of findings

¹ Env Perf Audit refers to Environmental Performance Audit

² Not applicable – East Package works had not commenced within Reporting Period.

³ Not applicable – West Package works had not commenced within Reporting Period.

Audit Findings, Corrective Actions and Compliance

North Package

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

Table E.2 – North Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	8	2	6
Area for Improvement (AFI)	0	13	5	8
Observation	3	12	11	4
Total	3	33	18	18

North Package (M80RRA) activities were considered to be Compliant with 68 of the 73 EPRs audited across this Reporting Period, given that no Non-Compliances were identified against these 68 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, eight (8) Non-compliance findings were raised against the remaining five (5) EPRs, being Environmental Management EPR EMF2, Air Quality EPR AQ1, Arboriculture EPR AR2, Business EPR B1 and Surface Water EPR SW5.

Two (2) Non-compliance findings raised against EPR EMF2 were closed during this Reporting Period. The six (6) Non-compliance findings remaining open at the end of this Reporting Period are associated with four (4) EPRs, being single Non-compliance findings raised against EPRs EMF2, AR2, and SW5 and two (2) Non-compliance findings raised against EPR AQ1. The EPR AQ1 and SW5 findings, were all identified at the end of this Reporting Period.

All three (3) Observation findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2023 to April 2024) were closed during this Reporting Period.

Findings which remained open at the end of this Reporting Period will require appropriate corrective action to manage and control the associated risks.

South Package

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

Table E.3 – South Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	1	4	3	2
Area for Improvement (AFI)	3	13	11	5
Observation	2	10	2	10
Total	6	27	16	17

The South Package (EFBTA) activities were considered to be Compliant with 63 of the 65 EPRs audited across this Reporting Period, given that no Non-compliances were identified against these 63 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, four (4) Non-compliance findings were raised against two (2) EPRs namely Contamination and Soil EPR CL5, and Traffic and Transport EPR T2.

Three (3) of the Non-compliance findings, all of which were against EPR CL5 and associated with chemical storage, were closed during this Reporting Period. The Non-compliance finding against EPR T2, which was raised during the quarterly EMF and EPR Compliance Audit conducted in August 2024, remained open.

Two (2) of the six (6) findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2023 – April 2024)) were subsequently closed during this Reporting Period. The previous findings closed during this Reporting Period included two (2) AFIs against Surface Water EPR SW5.

The findings that remained open at both the beginning and the end of this Reporting Period included a single Non-compliance against Contaminated Land and Soil EPR CL1, one (1) AFI against Contaminated Land and Soil EPR CL5, and two (2) Observations which were against Environmental Management EPR EMF2.

Findings which remained open at the end of this Reporting Period will require appropriate corrective action to manage and control the associated risks.

Indara Tower Relocation Works

No further compliance audits of the Indara Tower Relocation Works were conducted during this Reporting Period. A desktop assessment was undertaken during this Reporting Period to determine if corrective actions undertaken by MRPV had addressed two (2) findings raised during the compliance audit conducted on these works in November 2023, with the close out of those findings summarised in Table E.4.

Table E.4 – Indara Tower Relocation Works Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised During Reporting Period	Closed During Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0
Areas for Improvement	0	0	0	0
Observation	2	0	2	0
Total	2	0	2	0

The FIEA assessed that corrective actions undertaken by MRPV had resulted in closure of the two (2) observation findings associated with Arboriculture EPR AR2 and Flora and Fauna EPR FF3, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

The Indara Tower Relocation Works have been completed with all FIEA compliance audit findings having been closed.

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Abbreviations and Glossary

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

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

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

1. Introduction

The North East Link (NEL) Environmental Management Framework (EMF) requires that Major Road Projects Victoria (MRPV) provides Six-Monthly Summary Reports as to compliance with the EMF and Environmental Performance Requirements (EPRs) to the Minister for Planning.

In accordance with Section 7.3 *Reporting* of the EMF, these reports must summarise the audit activities undertaken during this reporting period, audit findings, the status of actions taken to address previous audit findings, and the contractors' compliance with the EMF and EPRs.

1.1 Purpose of this Report

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

- **May to October 2024** inclusive (herein referred to as this Reporting Period).

This Report covers:

- Audits conducted by the FIEA on activities associated with the Alliances delivering the NELP Freeway Packages (restricted to the North and South Packages for this Reporting Period). The North Package is being delivered by the M80 Ring Road Alliance (M80RRA) and the South Package by the Eastern Freeway Burke to Tram Alliance (EFBTA); and,
- Assessment by the FIEA of corrective actions to close two (2) observations, associated with findings from the November 2023 audit of the relocation of the Indara telecommunications tower at Thompsons Road, Bulleen, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

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

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

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

1.2 Report Structure

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

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

2. North East Link Program Overview

2.1 North East Link

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

The NEL includes:

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

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

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

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

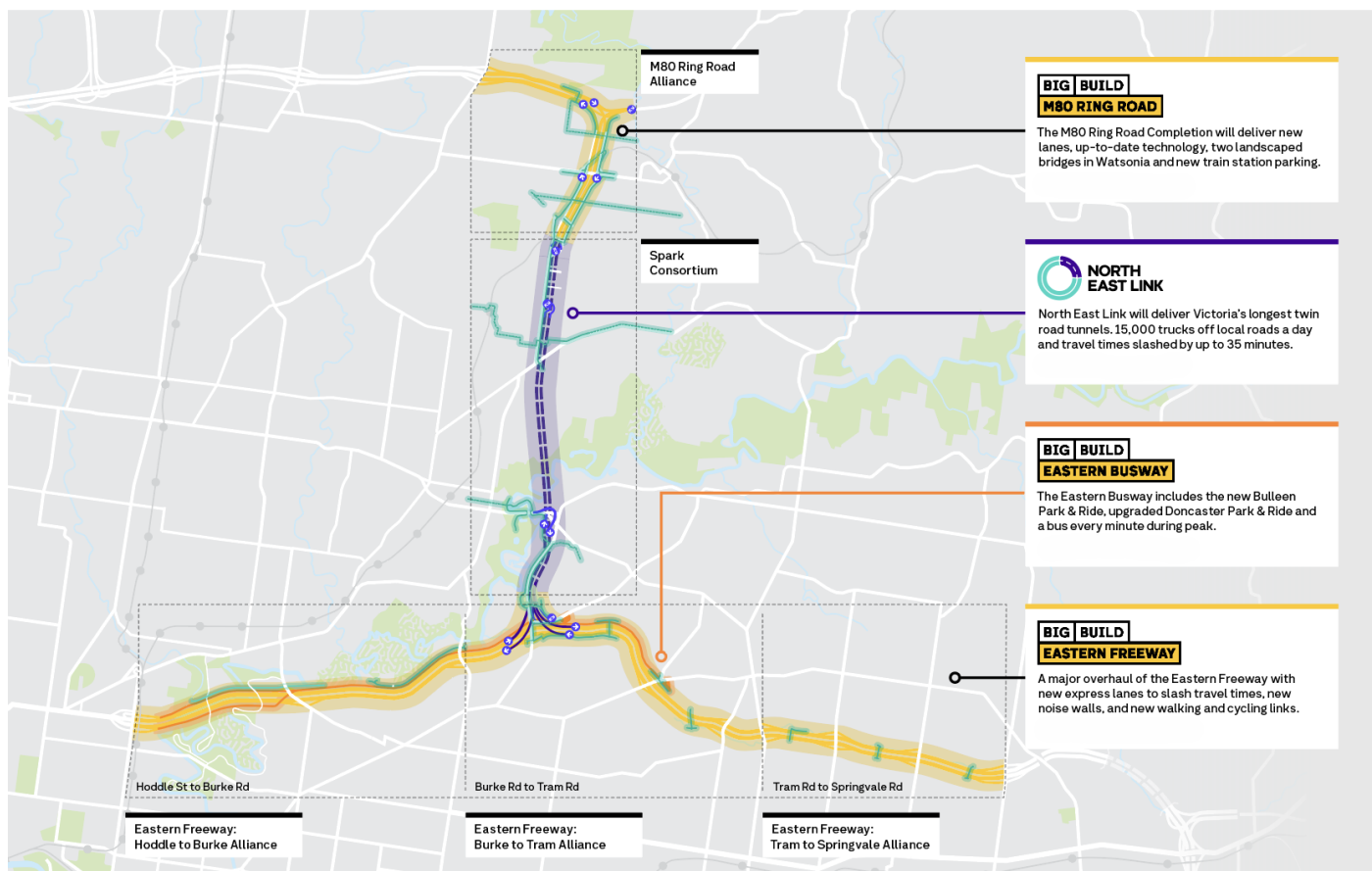


Figure 2.1: NEL Packages

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2.2 Freeway Packages

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

Where applicable during this Reporting Period, it should be noted that this Report will also cover other audit activities conducted by the FIEA, including specific ‘Project-wide’ EPRs for which MRPV is fully or partially responsible (Note: no Project-wide EPR audit was conducted within this Reporting Period), and non-contestable works associated with relocation of the Indara telecommunications tower at Thompsons Road, Bulleen (Note: during this Reporting Period this was restricted to assessment of corrective action evidence associated with closing findings that remained open at the end of the previous reporting period (i.e., November 2023 to April 2024).

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

2.2.1 North Package

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

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

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

2.2.2 South Package

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

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

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

2.2.3 East Package

The East Package will include design and construction of the Eastern Freeway upgrade from Tram Road to Springvale Road. At the time of this Reporting Period, a contract for the East Package had not been awarded.

2.2.4 West Package

The West Package will include design and construction of the Eastern Freeway upgrade from Burke Road to Hoddle Street. At the time of this reporting period, a contract for the West Package had not been awarded.

2.3 EMF and EPRs

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

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

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

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

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

- Environmental management framework
- Aboriginal cultural heritage

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

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

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

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

2.4 Independent Environmental Auditor

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

The IEA is also responsible for preparing a Six-Monthly Summary Report (i.e., this Report) summarising audit activities during this reporting period, audit findings, the status of corrective actions taken to address previous audit findings and the contractors' compliance

with the EMF and EPRs; and providing it to MRPV and the contractor. In turn, it is MRPV's responsibility to provide the Six-Monthly Summary Reports to the Minister for Planning.

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

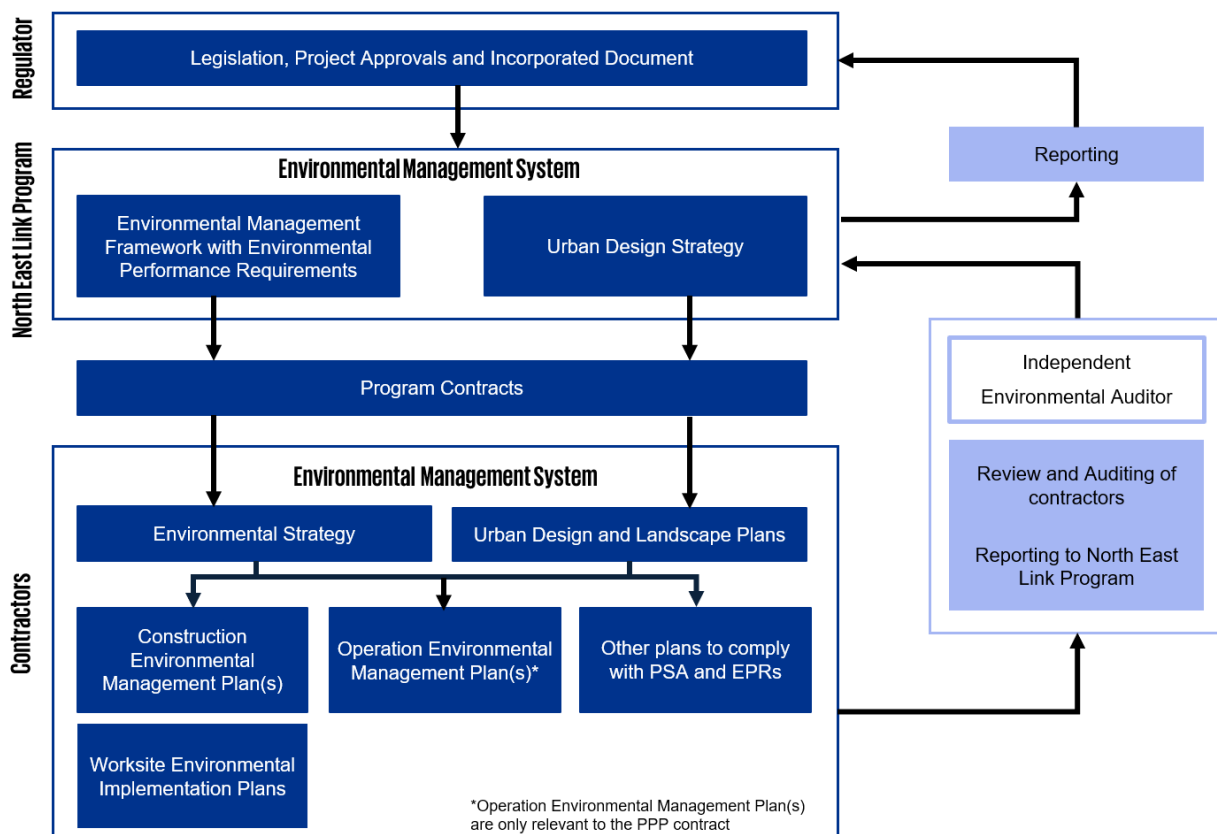


Figure 2.2: Overview of relationship between MRPV (referred to in the Figure as NELP), Contractors (i.e., Freeway Packages Alliances) and IEA (extract of Figure 6-1 of the EMF (dated 12 July 2021))

3. Audit Activities

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

3.1 FIEA Compliance Audit Program

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

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

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

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

The FIEA also conducts additional compliance audits that may be required under a risk-based approach (refer to Section 3.1.1 Risk-based Audit Scoping) and as required by MRPV, including on other packages of work that may arise during delivery of the NELP. These additional compliance audits also include conducting audits on MRPV, which is responsible either in full or partially, for compliance with 18 EPRs that apply on a Project-wide basis.

3.1.1 Risk-based Audit Scoping

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

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

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

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

Standing scope items were addressed during the audits included:

- At each and every audit, assessment of corrective actions undertaken by the auditee to close out findings arising from previous audits; and,
- During EMF and EPR Compliance Audits, review of complaints received and incidents arising across this audit period.

3.1.2 Approach

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

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

audit team for monthly Environmental Performance Audits comprises a Lead Environmental Auditor and supporting Environmental Auditor.

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

Table 3.2: Compliance Audit approach

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

3.1.3 Audit Finding Categories and Reporting

The findings from each audit are classified using the audit finding categories presented in Table 3.3. These categories align with those applied to the Central Package by the CP IREA.

Table 3.3: Audit finding categories

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

Audit Finding Categories	Definition
Areas for Improvement (AFI)	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 is insufficient evidence to make a judgement on 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.

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

3.2 Compliance with EMF and EPRs

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

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

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

insofar as they are applicable to the site subject to the monthly Environmental Performance Audit, were considered.

3.3 FIEA Reporting Period Audit Activities

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

In addition to the Compliance Audit Program described in Section 3.1 *FIEA Compliance Audit Program*, during this Reporting Period the following additional audits and assessment activities were conducted by the FIEA:

- A compliance audit of the North Package focussing on M80RRA's Erosion and Sediment (ERSED) controls as required under Air Quality and Surface Water EPRs AQ1 and SW5 respectively;
- A standalone site visit to the South Package comprising observational assessment only of EFBTA's dust control measures, as required under Air Quality EPR AQ1, at the interface with the Central Package; and,
- Assessment by the FIEA of corrective actions to close two (2) observations, associated with findings from the November 2023 audit of the relocation of the Indara telecommunications tower at Thompsons Road, Bulleen, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

A summary of the compliance audits conducted by the FIEA across this Reporting Period is provided in Table 3.4. Further details with respect to the scope of the compliance audits completed within this Reporting Period are provided for each Freeway Package, and for any additional audits conducted, in the following sections (refer to Sections 3.2.1 to 3.2.5).

Table 3.4: FIEA Compliance Audits conducted in this Reporting Period

Package	May 2024	Jun 2024	Jul 2024	Aug 2024	Sept 2024	Oct 2024
North Package (M80RRA)	EMF and EPR Compliance Audit	Env Perf Audit ⁴	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit; and, ERSED controls Compliance Audit
South Package (EFBTA)	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit	EMF and EPR Compliance Audit	Env Perf Audit	Env Perf Audit; and, Standalone site visit

⁴ Env Perf Audit refers to Environmental Performance Audit

Package	May 2024	Jun 2024	Jul 2024	Aug 2024	Sept 2024	Oct 2024
						(dust controls)
East Package (TBC)⁵	N/A	N/A	N/A	N/A	N/A	N/A
West Package (TBC)⁶	N/A	N/A	N/A	N/A	N/A	N/A
Project-wide EPRs (MRPV)	N/A	N/A	N/A	N/A	N/A	N/A
Indara Tower Relocation Works	Desktop assessment	N/A	N/A	N/A	N/A	N/A

3.3.1 North Package (M80RRA) Compliance Audits

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

96 EPRs were relevant to/triggered by the North Package activities during this Reporting Period. The FIEA Compliance Audit Program assessed compliance against 73 of these relevant EPRs during this Reporting Period. The EPRs assessed included those addressed by the WEMPs and CCPs assessed at a site-level during the monthly Environment Performance Audit, and the Package-level EPRs included within the scope of the quarterly EMF and EPR Compliance Audit.

Table 3.5 – Scope of North Package (M80RRA) Audits

Month	Summary of scope
May 2024	Quarterly EMF and EPR Compliance Audit: <ul style="list-style-type: none"> EMF and EPRs assessed: <ul style="list-style-type: none"> Environmental Management Framework EPRs EMF2 and EMF4, including following Environmental Strategy and CEMP components: Roles and responsibilities; Environmental Management Documentation; and, Auditing Air Quality EPR AQ1; Contamination and Soil EPRs CL1 to CL5 (Note: EPR CL6 not relevant to package); Groundwater EPRs GW1 to GW4 (Note: EPR GW5 not relevant to package); Traffic and Transport EPRs T1 to T5; Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s);

⁵ Not applicable – East Package works had not commenced within Reporting Period

⁶ Not applicable – West Package works had not commenced within Reporting Period

Month	Summary of scope
	<ul style="list-style-type: none"> Review of complaints (EPRs EMF4 and SC3) and incidents; Construction sites assessed: <ul style="list-style-type: none"> Zone 3100-3200 - implementation of kangaroo fencing under EPR FF1; AK Lines Construction Compound - focus on spoil management; Zone 3500-3600, Watsonia Station Carpark - implementation of in-scope EPRs, WEMP and CCP assessed
Jun 2024	Monthly Environment Performance Audit assessed implementation of: <ul style="list-style-type: none"> <i>WEMP Zone 3100 – 3200 (Phase 2)</i>, with site visit to M80 Zone 3100 Works, between Plenty Road to Macorna St Bridge/Overpass
Jul 2024	Monthly Environment Performance Audit assessed implementation of: <ul style="list-style-type: none"> <i>WEMP Zone 3300 – 3400 (Phase 2)</i>, with site visit to Zone 3300 (Areas C, D & E); and, <i>WEMP Zone 3100 – 3200 (Phase 2)</i>, with site visit to M80 Zone 3100 (Area WB/Tree Removal location)
Aug 2024	Quarterly EMF and EPR Compliance Audit: <ul style="list-style-type: none"> EMF and EPRs assessed: <ul style="list-style-type: none"> Environmental Management Framework EPRs EMF2 and EMF4, including following Environmental Strategy and CEMP components: Management System Framework; Reporting and Monitoring; and, Consultation and Communications; Business EPRs B1 and B4 to B8 (EPRs B2 and B3 not relevant to Package); Ground Movement EPRs GM1 to GM4; Surface Water EPRs SW1 to SW15; and, Social and Community EPRs SC1 to SC6 (EPRs SC7 and SC8 not relevant to Package). Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s); Review of complaints (EPRs EMF4 and SC3) and incidents; Construction sites assessed: <ul style="list-style-type: none"> Gabonia Construction Compound and Watsonia Offset Car Park – implementation of in-scope EPRs, WEMP and CCP assessed; Zone 3500-3600 – implementation of in-scope EPRs, WEMP and CCP assessed.
Sept 2024	Monthly Environment Performance Audit: <ul style="list-style-type: none"> <i>WEMP - Zone 3100-3200 (Phase 2)</i>, with site visit to M80RRA works on the M80 Highway Mound and Shoulder.
Oct 2024	<ul style="list-style-type: none"> Monthly Environment Performance Audit: <ul style="list-style-type: none"> <i>WEMP AK Lines Compound and CCP AK Lines Compound</i>, with site visit to AK Lines Construction Compound. ERSED Controls Compliance Audit: ERSED requirements within following EPRs assessed: AQ1 and SW5

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

3.3.2 South Package (EFBTA) Compliance Audits

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

90 EPRs were relevant to/triggered by the South Package during this Reporting Period. The FIEA Compliance Audit Program assessed compliance against 65 of these relevant EPRs during this Reporting Period. The EPRs assessed included those addressed at a site-level by the WEMPs and CCPs assessed during the monthly Environment Performance Audit, and the Package-level EPRs included within the scope of the quarterly EMF and EPR Compliance Audit.

Table 3.6 – Scope of South Package (EFBTA) Audits

Month	Summary of scope
May 2024	Quarterly EMF and EPR Compliance Audit: <ul style="list-style-type: none"> EMF and EPRs assessed: <ul style="list-style-type: none"> Environmental Management Framework EPRs EMF2 and EMF4, including following Environmental Strategy and CEMP components: Roles and Responsibilities; Environmental Management Documentation; Compliance Monitoring and Auditing; Contamination and Soil EPRs CL1 to CL5 (Note: EPR CL6 not relevant to package); Groundwater EPRs GW1 to GW4 (Note: EPR GW5 not relevant to package); Surface Water EPRs SW1 to SW15; Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s); Review of complaints (EPRs EMF4 and SC3) and incidents; Construction sites assessed: <ul style="list-style-type: none"> Zone 5100 - Koonung Creek Construction Compound - implementation of in-scope EPRs, WEMP and CCP assessed; and, Zone 5600 – Valda Wetlands Construction Area.
Jun 2024	Monthly Environment Performance Audit assessed implementation of: <ul style="list-style-type: none"> WEMP Zone 5500 Doncaster Road Construction Compound and CCP Doncaster Road Compound, with site visit to Doncaster Road Construction Compound.
Jul 2024	Monthly Environment Performance Audit assessed implementation of:

Month	Summary of scope
	<ul style="list-style-type: none"> WEMP Zone 5100 U4 Ramp Diversion, BR105 Demo & Br103, 105 & 106 Central Pier Piling & FRP, with site visit to Bulleen Interchange South (North of Leonis Ave).
Aug 2024	Quarterly EMF and EPR Compliance Audit: <ul style="list-style-type: none"> EMF and EPRs assessed: <ul style="list-style-type: none"> Environmental Management Framework EPRs EMF2 and EMF4, including following Environmental Strategy and CEMP components: Policy and Objectives; Incidents and Emergency Response; Review, Improvement and Documentation; Aboriginal Heritage EPR AH1; Arboriculture EPRs AR1 to AR3; Ground Movement EPRs GM1 to GM4; Historic Heritage EPRs HH1, HH2, HH4 and HH5 (EPR HH3 is not relevant to Package); Traffic and Transport EPRs T1 to T5; Corrective actions - review of corrective actions implemented to address findings arising from previous audit(s); Review of complaints (EPRs EMF4 and SC3) and incidents; Construction sites assessed: <ul style="list-style-type: none"> Bulleen Interchange civils including Freeway Golf Course Construction Compound, works north of Koonung Creek and Works undertaken at Koonung Creek Trail and at the Manningham Hotel - implementation of in-scope EPRs, WEMP and CCP assessed; and, Valda Wetlands Construction Area focussing on tree removals under EPR AR1.
Sept 2024	Monthly Environment Performance Audit: <ul style="list-style-type: none"> WEMP – Zone 5600 Valda Wetlands, with site visit to Valda Wetlands.
Oct 2024	<ul style="list-style-type: none"> Monthly Environment Performance Audit: <ul style="list-style-type: none"> WEMP - Zone 5500 – Doncaster Road Interchange and CCP Doncaster Road, with site visit to Doncaster Road Interchange and Doncaster Road Construction Compound. Standalone site visit (dust controls): site visit to the northern end of the Bulleen Interchange works at the interface with the Central Package.

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

3.3.3 East Package Compliance Audits

At the time of this Reporting Period, the East Package was under tender.

3.3.4 West Package Compliance Audits

At the time of this Reporting Period, the West Package was under tender.

3.3.5 Other FIEA Compliance Audits

No further compliance audits were conducted during this Reporting Period.

However, a desktop assessment was undertaken during this Reporting Period to determine if corrective actions undertaken by MRPV had addressed two (2) findings raised during the compliance audit conducted on the Indara Tower Relocation Works in November 2023 (as included within the previous Six-Monthly Summary Report (i.e., covering November 2023 to April 2024)).

Whilst the FIEA is responsible for assessing MRPV's compliance with a number of Project-wide EPRs, no Project-wide EPR Compliance Audit was conducted by the FIEA during this Reporting Period (Note: a Project-wide EPR Compliance Audit was conducted by the FIEA in November 2023, with the next audit scheduled for November 2024).

4. Audit Findings and Corrective Actions

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

4.1 North Package

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

Table 4.1 – North Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	0	8	2	6
AFI	0	13	5	8
Observation	3	12	11	4
Total	3	33	18	18

A total of 33 audit findings were raised during this Reporting Period, comprising eight (8) Non-compliances, 13 AFIs and 12 Observations. Three (3) Observations remained open at the beginning of this Reporting Period from the previous Reporting Period (i.e., November 2023 to April 2024).

During this Reporting Period, corrective actions undertaken by M80RRA resulted in the closure of two (2) Non-compliances, 5 AFIs and 11 Observations.

All three (3) Observation findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2023 to April 2024)) were closed during this Reporting Period. In total, six (6) Non-compliances, eight (8) AFIs and four (4) Observations remained open at the end of this Reporting Period. Corrective actions, where undertaken by the M80RRA, to address the findings that remain open at the end of this Reporting Period will be assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).

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

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

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
EMF and EMF EPRs	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF2 and EMF4 	<ul style="list-style-type: none"> EPR EMF2 – Three (3) Non-compliances and seven (7) Observation raised during this Reporting Period. One (1) Observation remained open from the previous Reporting Period (i.e., November 2023 to April 2024). EPR EMF4 - Compliant 	<ul style="list-style-type: none"> Two (2) Non-compliances against EPR EMF2 closed One (1) Non-compliance against EPR EMF2 remains open Four (4) Observations against EPR EMF2 closed, including the Observation which remained open from the previous Reporting Period (i.e., November 2023 to April 2024) Four (4) Observations remain open
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised 	<ul style="list-style-type: none"> Observation closed
Air Quality	<ul style="list-style-type: none"> EPRs AQ1 and AQ6 	<ul style="list-style-type: none"> EPR AQ1 - Two (2) Non-compliances, two (2) AFIs and one (1) Observation raised during this Reporting Period EPR AQ6 - Compliant 	<ul style="list-style-type: none"> The two (2) Non-compliances raised against EPR AQ1 during this reporting Period remain open One (1) of the AFIs raised against EPR AQ1 during this reporting Period remains open One (1) of the AFIs and the Observation raised against EPR AQ1 were both closed

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3 	<ul style="list-style-type: none"> EPRs AR1 and AR3 – Compliant EPR AR2 – One (1) Non-compliance, one (1) AFI and one (1) Observation raised during this Reporting Period. In addition, one (1) Observation remained open from the previous Reporting Period (i.e., November 2023 to April 2024). 	<ul style="list-style-type: none"> EPR AR2 Observation closed Both the Non-compliance and AFI raised against EPR AR2 during this reporting Period remain open The EPR AR2 Observation open at the beginning of this Reporting Period was closed
Business	<ul style="list-style-type: none"> EPRs B1, B4 and B8 	<ul style="list-style-type: none"> EPRs B4 to B8 – Compliant EPR B1 - One (1) Non-compliance, one (1) AFI and one (1) Observation raised during this Reporting Period 	<ul style="list-style-type: none"> EPR B1 Non-compliance remains open
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR CL1 	<ul style="list-style-type: none"> EPR CL1 AFI closed
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF5, FF7, FF9 and FF10 	<ul style="list-style-type: none"> Compliant 	-
Ground Movement	<ul style="list-style-type: none"> EPRs GM1 to GM4 	<ul style="list-style-type: none"> Compliant, with one (1) Observation raised against EPR GM2 	<ul style="list-style-type: none"> EPR GM2 Observation closed
Groundwater	<ul style="list-style-type: none"> EPR GW1 to GW4 	<ul style="list-style-type: none"> Compliant 	-
Historical Heritage	<ul style="list-style-type: none"> EPR HH1 and HH2 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPR LP5 	<ul style="list-style-type: none"> Compliant 	-
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV2 and LV3 	<ul style="list-style-type: none"> Compliant 	-

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV3 to NV5, NV8, NV9, NV13 and NV14 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR NV14 One (1) Observation raised against EPR NV5 remained open from the previous Reporting Period (i.e., November 2023 to April 2024) 	<ul style="list-style-type: none"> EPR NV14 AFI closed EPR NV5 Observation closed
Social and Community	<ul style="list-style-type: none"> EPRs SC1 to SC6 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR SC3 	<ul style="list-style-type: none"> EPR SC3 AFI remains open
Surface Water	<ul style="list-style-type: none"> EPRs SW1 to SW15 	<ul style="list-style-type: none"> EPRs SW1 to SW4 and SW6 to SW15 – Compliant EPR SW5 – One (1) Non-compliance and seven (7) AFIs raised during this Reporting Period 	<ul style="list-style-type: none"> EPR SW5 Non-compliance remains open Two (2) EPR SW5 AFIs closed Five (5) EPR SW5 AFIs remain open
Sustainability and Climate Change⁷	-	-	-
Traffic and Transport	<ul style="list-style-type: none"> EPRs T1 to T5 	<ul style="list-style-type: none"> Compliant with one (1) Observation raised against EPR T2 	<ul style="list-style-type: none"> EPR T2 Observation closed

The North Package (M80RRA) activities were considered to be Compliant with 68 of the 73 EPRs audited across this Reporting Period, given that no Non-compliances were identified against these 68 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, Non-compliance findings were raised against the remaining five (5) EPRs namely EMF2, AQ1, AR2, B1 and SW5. Summaries of the Non-compliance findings identified during this Reporting Period are provided in Table 4.3.

Table 4.3: North Package Non-compliance findings

EPR Topic	Non-compliance Findings	Close-out Status
Environmental Management EPR EMF2	<ul style="list-style-type: none"> Internal audit reports had not been provided to the FIEA as required by M80RRA’s Environmental Strategy and CEMP. (<i>Note:</i> identified during the EMF and EPR Compliance Audit conducted in May 2024). 	<ul style="list-style-type: none"> Closed

⁷ No Sustainability and Climate Change EPRs were assessed during this Reporting Period

EPR Topic	Non-compliance Findings	Close-out Status
Environmental Management EPR EMF2	<ul style="list-style-type: none"> Refuelling activities, including associated controls, did not reflect what was covered within the WEMP for Zone 3500-3600. In addition, no dedicated refuelling locations had been provided. (<i>Note: identified during the EMF and EPR Compliance Audit conducted in August 2024).</i> 	<ul style="list-style-type: none"> Closed
Environmental Management EPR EMF2	<ul style="list-style-type: none"> Whilst the AK Lines CCP stated that the Construction Compound would comprise a single-storey facility, sections of the Construction Compound facility were of two-storey construction. (<i>Note: identified during the Environmental Performance Audit conducted in October 2024).</i> 	<ul style="list-style-type: none"> Open
Air Quality EPR AQ1	<ul style="list-style-type: none"> Direct Deposition Gauges (DDGs) had not been deployed to monitor dust emissions, in response to dust complaints being received from commercial properties, at the southern end of the North Freeway Package, which interfaces with the Central Package. (<i>Note: identified during the ERSED Controls Compliance Audit conducted in October 2024).</i> 	<ul style="list-style-type: none"> Open
Air Quality EPR AQ1	<ul style="list-style-type: none"> A number of dust-generating activities, such as earthworks and materials handling, did not appear to be adequately controlled by supplementary dust control measures. (<i>Note: identified during the ERSED Controls Compliance Audit conducted in October 2024).</i> 	<ul style="list-style-type: none"> Open
Arboriculture EPR AR2	<ul style="list-style-type: none"> Ongoing tree protection and inadvertent tree removal issues continued to occur, based on incidents reported by M80RRA and AFIs identified during a number of EMF and EPR Compliance Audits and Environmental Performance Audits conducted by the FIEA between February 2024 to August 2024. 	<ul style="list-style-type: none"> Open
Business EPR B1	<ul style="list-style-type: none"> Trader Impact Reports or Zone Impact Reports, including formal documentation for support requirements, had not been completed by M80RRA. (<i>Note: identified during the EMF and EPR Compliance Audit conducted in August 2024).</i> 	<ul style="list-style-type: none"> Open
Surface Water EPR SW5	<ul style="list-style-type: none"> Concrete washout material was observed on ground surfaces. In addition, there was no evidence of use of washout facilities. (<i>Note: identified during the ERSED Controls Compliance Audit conducted in October 2024).</i> 	<ul style="list-style-type: none"> Open

Two (2) of the Non-compliance findings raised against EPR EMF2 were closed during this Reporting Period.

The Non-compliance findings raised against EPR AR2 and B1 remained open. The two (2) Non-compliance findings raised against EPR AQ1 and the Non-compliance findings raised against EPRs EMF2 and SW5, all remain open at the end of this Reporting Period and were

all identified at the end of this Reporting Period during the monthly Environmental Performance Audit and the ERSED Controls Compliance Audit conducted on 23 and 25 October 2024 respectively.

4.2 South Package

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

Table 4.4 – South Package Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised during Reporting Period	Closed during Reporting Period	Open at end of Reporting Period
Non-Compliance	1	4	3	2
Areas for Improvement	3	13	11	5
Observation	2	10	2	10
Total	6	27	16	17

A total of 27 audit findings were raised during this Reporting Period, comprising four (4) Non-compliances, 13 AFIs and 10 Observations. One (1) Non-compliance, three (3) AFIs and two (2) Observations remained open at the beginning of this Reporting Period.

During this Reporting Period, corrective actions undertaken by EFBTA resulted in the closure of three (3) of the Non-compliances, 11 AFI and two (2) Observations.

Two (2) of the six (6) findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (November 2023 to April 2024)) were subsequently closed during this Reporting Period. The previous findings closed during this Reporting Period included two (2) AFIs against Surface Water EPR SW5.

The findings that remained open at both the beginning and the end of this Reporting Period included a single Non-compliance against Contaminated Land and Soil EPR CL1, one (1) AFI against Contaminated Land and Soil EPR CL5, and two (2) Observations which were against Environmental Management EPR EMF2.

Consequently, two (2) Non-compliances, five (5) AFIs and 10 Observations remained open at the end of this Reporting Period. Corrective actions, where undertaken by the EFBTA, to address the Observations that remain open at the end of this Reporting Period will be

assessed by the FIEA through audits to be completed during the next Reporting Period (i.e., November 2025 to April 2026).

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

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

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
EMF and EMF EPRs	<ul style="list-style-type: none"> Environmental Strategy CEMP EPRs EMF2 to EMF4 	<ul style="list-style-type: none"> Compliant, with one (1) AFI and two (2) Observations raised against EPR EMF2 during this Reporting Period. In addition, two (2) Observations against EPR EMF2 were open at beginning of Reporting Period. 	<ul style="list-style-type: none"> The AFI and one (1) of the Observations raised against EPR EMF2 during this Reporting Period closed One (1) Observation raised against EPR EMF2 during this Reporting Period remains open Two (2) Observations open at beginning of Reporting Period remain open
Aboriginal Heritage	<ul style="list-style-type: none"> EPR AH1 	<ul style="list-style-type: none"> Compliant 	-
Air Quality	<ul style="list-style-type: none"> EPR AQ1 	<ul style="list-style-type: none"> Compliant 	-
Arboriculture	<ul style="list-style-type: none"> EPRs AR1 to AR3 	<ul style="list-style-type: none"> Compliant with three (3) Observations raised against EPR AR1 and one (1) AFI raised against EPR AR2 	<ul style="list-style-type: none"> One (1) of the EPR AR1 Observations closed with two (2) remaining open EPR AR2 AFI closed
Business	<ul style="list-style-type: none"> EPR B4 	<ul style="list-style-type: none"> Compliant 	-
Contamination and Soil	<ul style="list-style-type: none"> EPRs CL1 to CL5 	<ul style="list-style-type: none"> EPRs CL1, CL2, CL3 and CL4 – Compliant, with one (1) AFI raised against EPR CL1 during this Reporting Period EPR CL5 - Three (3) Non-compliances, five (5) AFIs and one (1) Observation raised during this Reporting Period One (1) Non-compliance against EPR CL1 and one 	<ul style="list-style-type: none"> The three (3) Non-compliances raised against EPR CL5 during this reporting Period, were closed AFI raised against EPR CL1 during this reporting Period was closed Four (4) AFIs raised against EPR CL5 during this Reporting Period

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
		(1) AFI against EPR CL5 remained open at the beginning of this Reporting Period	were closed, with one (1) AFI and one (1) Observation remaining open <ul style="list-style-type: none"> EPR CL1 Non-compliance and EPR CL5 AFI, which were both open at the beginning of this Reporting Period, were not closed during this reporting Period and remain open
Flora and Fauna	<ul style="list-style-type: none"> EPRs FF1 to FF5, and FF8 	<ul style="list-style-type: none"> Compliant, with one (1) AFI raised against EPR FF4 	<ul style="list-style-type: none"> EPR FF4 AFI remains open
Ground Movement	<ul style="list-style-type: none"> EPRs GM1 to GM4 	<ul style="list-style-type: none"> Compliant with two (2) Observations raised against EPR GM2 	<ul style="list-style-type: none"> Both EPR GM2 Observations remain open
Groundwater	<ul style="list-style-type: none"> EPR GW1 to GW4 	<ul style="list-style-type: none"> Compliant 	-
Historical Heritage	<ul style="list-style-type: none"> EPR HH1, HH2, HH4 and HH5 	<ul style="list-style-type: none"> Compliant 	-
Land Use Planning	<ul style="list-style-type: none"> EPRs LP1 and LP3 	<ul style="list-style-type: none"> Compliant 	-
Landscape and Visual	<ul style="list-style-type: none"> EPRs LV2 and LV3 	<ul style="list-style-type: none"> Compliant 	-
Noise and Vibration	<ul style="list-style-type: none"> EPRs NV1, NV3 to NV5, NV8, NV9, and NV14 	<ul style="list-style-type: none"> Compliant 	-
Social and Community	<ul style="list-style-type: none"> EPR SC3 	<ul style="list-style-type: none"> Compliant 	-

EPR Topic	Relevant EMF and EPRs assessed	Compliance Status	Close-out Status at end of Reporting Period
Surface Water	<ul style="list-style-type: none"> EPRs SW1 to SW15 	<ul style="list-style-type: none"> Compliant, but with the following findings: <ul style="list-style-type: none"> EPR SW1 – two (2) AFIs EPR SW3 - one (1) Observation EPR SW5 – two (2) AFIs EPR SW7 - one (1) Observation Two (2) AFIs against EPR SW5 remained open at the beginning of this Reporting Period 	<ul style="list-style-type: none"> EPR SW1 - two (2) AFIs remain open EPR SW3 Observation remains open EPR SW5 – both AFIs closed EPR SW7 Observation remains open Both AFIs against EPR SW5, which were open at the beginning of this Reporting Period, were closed
Sustainability and Climate Change	<ul style="list-style-type: none"> EPR SCC4 	<ul style="list-style-type: none"> Compliant 	-
Traffic and Transport	<ul style="list-style-type: none"> EPRs T1 to T5 	<ul style="list-style-type: none"> EPRs T1 and T3 to T5 – Compliant EPR T2 – One (1) Non-compliance raised 	<ul style="list-style-type: none"> EPR T2 Non-compliance remains open

The South Package (EFBTA) activities were considered to be Compliant with 63 of the 65 EPRs audited across this Reporting Period, given that no Non-compliances were identified against these 63 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, Non-compliance findings were raised against two (2) EPRs namely EPR CL5, and EPR T2. Summaries of the Non-compliance findings identified during this Reporting Period are provided in Table 4.6.

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

EPR Topic	Non-compliance Findings	Close-out Status
Contamination and Soil EPR CL1	<ul style="list-style-type: none"> The WEMP West Mainline Stage 1A Zone:5200 required spoil stockpiles to be separated by material type and clearly signposted, although the stockpiles had been separated, the audit identified that sign posting had not been provided. (<i>Note: this finding remained open at both the beginning and the end of this Reporting Period</i>). 	<ul style="list-style-type: none"> Open

EPR Topic	Non-compliance Findings	Close-out Status
Contamination and Soil EPR CL5	<ul style="list-style-type: none"> A 'HAZCHEM' outer warning placard was not being clearly displayed on the outside of the storage container at the Koonung Creek Construction Compound, as required under the <i>Dangerous Goods Regulations (2022)</i> and EFBTA's CEMP. (Note: identified during the EMF and EPR Compliance Audit conducted in May 2024). 	<ul style="list-style-type: none"> Closed
Contamination and Soil EPR CL5	<ul style="list-style-type: none"> Several open containers of chemicals were observed across the Koonung Creek Construction Compound that were not stored in appropriate bunded areas as required under EFBTA's CEMP. (Note: identified during the EMF and EPR Compliance Audit conducted in May 2024). 	<ul style="list-style-type: none"> Closed
Contamination and Soil EPR CL5	<ul style="list-style-type: none"> 'HAZCHEM' outer warning placards were not clearly displayed on the outside of the proprietary-built hazardous materials storage container at Doncaster Road Construction Compound as required under the <i>Dangerous Goods Regulations (2022)</i> and EFBTA's CEMP. (Note: identified during the Environmental Performance Audit conducted in June 2024). 	<ul style="list-style-type: none"> Closed
Traffic and Transport EPR T2	<ul style="list-style-type: none"> Several obstacles, which impeded pedestrian traffic, were observed along the temporary footpath constructed at the Manningham Hotel to provide connectivity between Thompsons Road and Bulleen Road. In addition, adequate wayfinding signage and directions were not provided. (Note: identified during the EMF and EPR Compliance Audit conducted in August 2024). 	<ul style="list-style-type: none"> Open

Three (3) of the Non-compliance findings, all of which were against EPR CL5 and associated with chemicals storage, were closed during this Reporting Period. The Non-compliant finding against EPR T2, which was raised during the quarterly EMF and EPR Compliance Audit conducted in August 2024, remained open pending sighting of evidence to demonstrate that corrective actions had been undertaken to address the finding.

In addition, a Non-compliance finding identified during the previous Reporting Period (i.e., November 2023 to April 2024), which remained open at the beginning of this Reporting Period, is summarised in Table 4.7.

Table 4.7: South Package Non-compliance findings identified during the previous Reporting Period (i.e., November 2023 to April 2024) that remained open at the beginning of this Reporting Period

EPR Topic	Non-compliance Findings	Close-out Status
Contamination and Soil EPR CL1	<ul style="list-style-type: none"> The WEMP West Mainline Stage 1A Zone:5200 required spoil stockpiles to be separated by material type and clearly signposted, although the stockpiles had been separated, the audit identified that sign posting had not been provided. (Note: this finding remained open at both the beginning and the end of this Reporting Period). 	<ul style="list-style-type: none"> Open

The Non-compliance finding against EPR CL1 that was open at the beginning of this Reporting Period, was not closed during this Reporting Period and remained open at the end of this Reporting Period.

4.3 East Package

At the time of this Reporting Period, the East Package was under tender evaluation.

4.4 West Package

At the time of this Reporting Period, the West Package was under tender evaluation.

4.5 Other FIEA Compliance Audits

4.5.1 Project-wide EPRs (MRPV)

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

4.5.2 Indara Tower Relocation Works

No further compliance audits of the Indara Tower Relocation Works were conducted during this Reporting Period. A desktop assessment was undertaken during this Reporting Period to determine if corrective actions undertaken by MRPV had addressed two (2) findings raised during the compliance audit conducted on these works in November 2023, with the close out of those findings summarised in Table 4.8.

Table 4.8 – Indara Tower Relocation Works Summary of Findings

Finding Type	Open at beginning of Reporting Period	Raised During Reporting Period	Closed During Reporting Period	Open at end of Reporting Period
Non-Compliance	0	0	0	0
Areas for Improvement	0	0	0	0
Observation	2	0	2	0
Total	2	0	2	0

The FIEA determined that corrective actions undertaken by MRPV had resulted in closure of the two (2) observation findings associated with Arboriculture EPR AR2 and Flora and Fauna EPR FF3, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

The Indara Tower Relocation Works have been completed with all FIEA compliance audit findings having been closed.

5. Overall Compliance

5.1 North Package

The FIEA audited 73 of the 96 EPRs relevant to the North Package (M80RRA) activities during this Reporting Period across seven (7) compliance audits.

North Package (M80RRA) activities were considered to be Compliant with 68 of the 73 EPRs audited across this Reporting Period, given that no Non-compliances were identified against these 68 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, eight (8) Non-compliance findings in total were raised against five (5) EPRs, with three (3) Non-compliances raised against EPR EMF2, two (2) Non-compliances raised against EPR AQ1, and one (1) Non-compliance each raised against EPRs AR2, B1 and SW5.

Two (2) of the Non-compliance findings raised against EPR EMF2 were closed during this Reporting Period. The Non-compliance findings raised against EPR AR2 and B1 remained open. The two (2) Non-compliance findings raised against EPR AQ1 and the Non-compliance findings raised against EPRs EMF2 and SW5, all remain open at the end of this Reporting Period and were all identified in the monthly Environmental Performance Audit and the ERSED Controls Compliance Audit conducted on 23 and 25 October 2024 respectively (i.e., at the end of this Reporting Period).

All three (3) Observation findings that were open at the beginning of this Reporting Period (i.e., open at the end of the previous Reporting Period (i.e., November 2023 to April 2024)) were closed during this Reporting Period.

The Non-compliance findings which remained open at the end of this Reporting Period will require appropriate corrective action to manage and control the associated risks.

5.2 South Package

The FIEA audited 65 of the 90 EPRs relevant to the South Package (EFBTA) activities during this Reporting Period across six (6) compliance audits and a standalone site visit focussing on dust controls.

The South Package (EFBTA) activities were considered to be Compliant with 63 of the 65 EPRs audited across this Reporting Period, given that no Non-compliances were identified against these 63 EPRs insofar as they were assessed within the scope of the FIEA Compliance Audit Program conducted within this Reporting Period. However, four (4) Non-compliance findings in total were raised against two (2) EPRs, with three (3) Non-compliances raised against EPR CL5, and one against EPR T1. In addition, a single Non-compliance finding against EPR CL1 remained open from the previous Reporting Period (i.e., November 2023 to April 2024).

Three (3) of the Non-compliance findings were closed during this Reporting Period. One (1) Non-compliance finding against EPR T1, which was identified during this Reporting Period, remained open. In addition, the single Non-compliance finding against EPR CL1, which

remained open at the beginning of this Reporting Period (i.e., was identified during the previous Reporting Period (November 2023 to April 2024)), was not closed during this Reporting Period and, consequently, remained open at the end of this Reporting Period.

The Non-compliance findings which remained open at the end of this Reporting Period will require appropriate corrective action to manage and control the associated risks.

5.3 East Package

At the time of this Reporting Period, the East Package was under tender.

5.4 West Package

At the time of this Reporting Period, the West Package was under tender.

5.5 Other FIEA Compliance Audits

5.5.1 Project-wide EPRs (MRPV)

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

5.5.2 Indara Tower Relocation Works

Through undertaking a desktop assessment comprising sighting evidence and interviews with MRPV personnel, the FIEA assessed that corrective actions undertaken by MRPV had resulted in closure of the two (2) observation findings, which remained open at the end of the previous Reporting Period (i.e., November 2023 to April 2024).

The Indara Tower Relocation Works have been completed with all FIEA compliance audit findings having been closed.



Appendix A – EPRs Audited During this Reporting Period

Appendix A1 - North Package

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

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

Appendix A2 - South Package

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

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



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