

North East Link Program – Central Package

IEA Six-Monthly Summary Environmental Compliance Report – May to October 2025

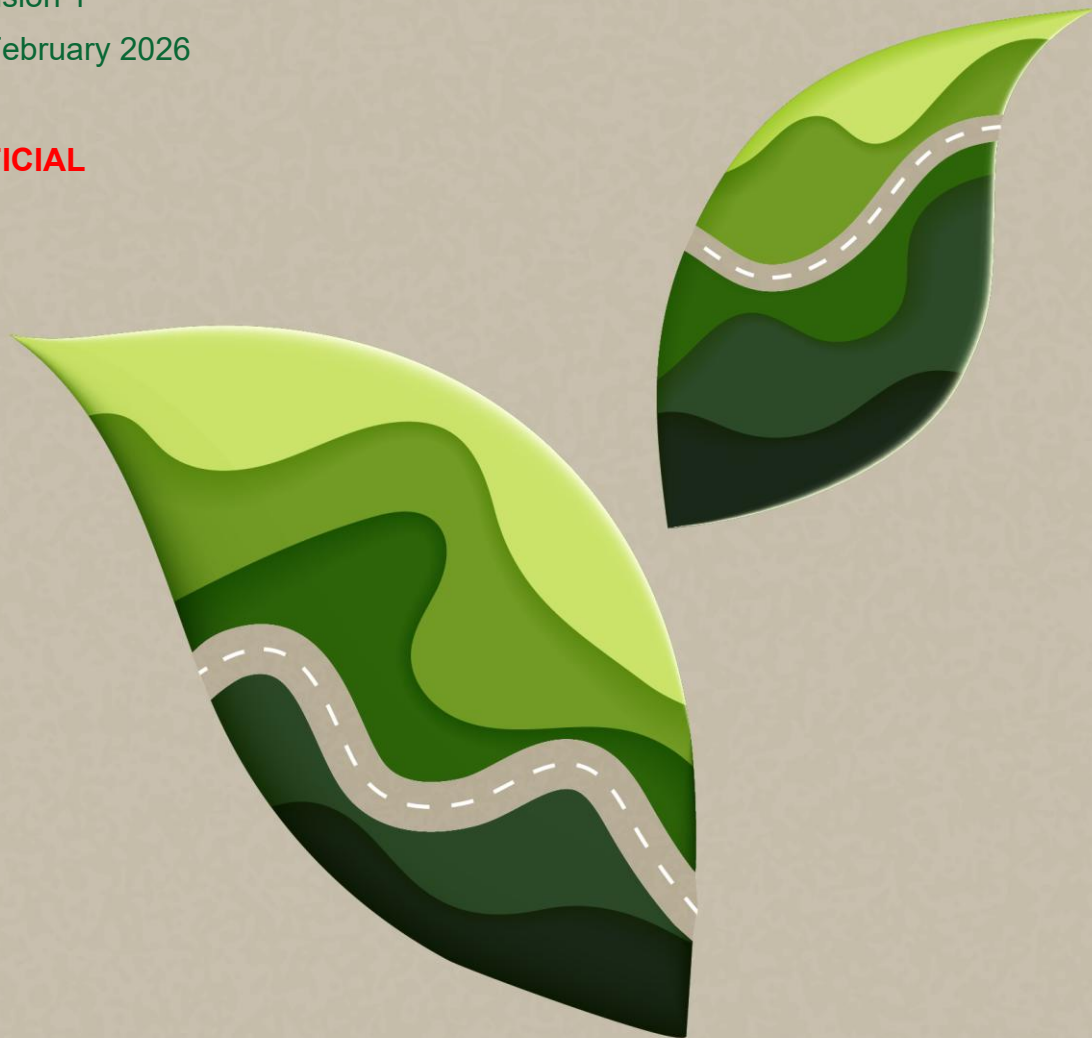
A Report to the Minister for Planning

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OFFICIAL





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Abbreviations

AAAJV	APP Arup Aurecon Joint Venture
AHMP	Archaeology & Heritage Management Plan
AMCC	Alternative Motorway Control Centre
AsMP	Asbestos Management Plan
BDMP	Business Disruption Mitigation Management Plan
BIZ	Bulleen Industrial Zone
CCEMP	Communication and Community Engagement Management Plan
CCP	Construction Compound Plan
CEMP	Construction Environmental Management Plan
CHDDA	Cultural Heritage Due Diligence Assessment
CNVIA	Construction Noise and Vibration Impact Assessment
CNVMP	Construction Noise and Vibration Management Plan
CP	Central Package
DAQMMP	Dust and Air Quality Management and Monitoring Plan
D&C	Design and Construct
DCN	Design Change Notice
EA	Environmental Auditor
EBTA	North East Link - Eastern Freeway Upgrade - Burke Road to Tram Road
EcMP	Ecology Management Plan
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMS	Environmental Management System
EMMP	Environmental Monitoring Management Plan
EPA	Environment Protection Authority
EPR	Environmental Performance Requirements
ERS	Environment Reference Standard
ERSED	Erosion and Sediment (Control Plan)



FEMP	Flood Emergency Management Plan
FOD mat	Proprietary name for a relocatable rumble mat designed to remove mud and debris from vehicle tyres
FP	Freeway Package(s)
GDE	Groundwater dependent ecosystem
GI(M)P	Green Infrastructure (Management) Plan
GMMP	Ground Movement Management Plan
GSRISP	Green Star Rating Implementation Sub-Plan
GWMP	Groundwater Management Plan
HIR	Hydro-Interpretive Report
IBC	Intermediate bulk container (1 m ³)
ICAN	Interim Contamination Assessment Notice
IDR	Interdisciplinary review
IEA	Independent Environmental Auditor
IFC	Issued for Construction
IFU	Issued for Use
IR	Independent Reviewer
IREA	Independent Reviewer and Environmental Auditor
ISRISP	Infrastructure Sustainability Rating Implementation Sub-Plan
M80	Upgrade of the M80 Ring Road and connection to the NELP CP works
M80 RRA	M80 Ring Road Alliance
MAT	Monitoring Action Team
MCC	Motorway Control Centre
MHM	Manningham
MP	Management Plan
NB	North bound
NCR	Non Conformance Report
NDD	Non Destructive Drilling
NELP	North East Link Program



OEMP	Operational Environmental Management Plan
OOH	Out of hours
OSD	On Site Detention
PPP	Public Private Partnership
PSDR	Project Scope and Delivery Requirements
PCo	(Spark) Project Company
PW	Project wide
RAP	Registered Aboriginal Party
SB	South bound
SEM	Sequential Excavation Method
SEP	Site Environment Plan
SMP	Sustainability Management Plan
SP	Secondary Package
SpMP	Spoil Management Plan
SRD	Southern Road Diversion (Bulleen)
SWMP	Surface Water Management Plan
SYSNCR	System NCR (raised in the Spark D&C internal system)
TCRP	Tree Canopy Replacement Plan
TN	Trinity North
TPZ	Tree Protection Zone
TMP	Transport Management Plan
TRP	Tree Removal Plan
TS	Trinity South
TPZ	Tree Protection Zone
UDLP	Urban Design Landscape Plan
VIDA	Victorian Infrastructure Delivery Authority
WASSMP	Waste Acid Sulfate Soils Management Plan
WTP	Water treatment plant
YVW	Yarra Valley Water



XP

Cross Passage



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 to conduct 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 May - October 2025.

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

Six audits were conducted during the audit period as shown in the following table. No audit was conducted in May 2025 due to a short working month in April. The May construction activities were included in the June audit scope.

Key Documents	June 25 (Quarterly)	July 25 (WEMP)	Aug 25 (WEMP)	Sept 25 (Quarterly)	Oct 25 (NELP EPRs)	Oct 25 (WEMP)
EPRs (as scheduled)	✓			✓	✓	
Environmental Strategy						
Construction Environmental Management Plan	✓ (selected elements)			✓ (all applicable elements)		
Management Plans required by the EPRs	✓ (selected plans)		Targeted SWMP audit	✓ (selected plans)		
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓		✓
Construction Compound Plans (CCPs)						



A total of thirty-two (32) audit findings were raised comprising two (2) Non-compliances, fourteen (14) Areas for Improvement, and sixteen (16) Observations. Thirty-eight (38) findings were closed during the reporting period. Twelve (12) findings remained open at the end of the reporting period.

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	2	2	4	0
Afl	9	14	16	7
O	7	16	18	5
Total	18	32	38	12

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 for some environmental aspects. The number of audit findings against the process documents (CEMP, and Sub-Plans) has decreased compared to the last reporting period. Findings against the WEMPs, which largely manage on ground environmental controls, have materially reduced but continued to make up about half of the total findings raised.

Collectively the findings raised in the reporting period indicate that Spark has continuing issues with site water management, and with mud tracking on to adjacent public roads.

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.

Eight (8) of the EPRs for which NELP Central Package is wholly or partly responsible were audited in the reporting period. No findings were raised.

Sixty-one (61) of the EPRs for which Spark is responsible were audited in the reporting period. One of these was audited twice. Three (3) findings were raised against the requirements of the EPRs; all Areas for Improvement. These findings related to chemical storage, and unneeded lighting during the day. Three (3) findings were closed, and one (1) finding remained open at the end of the reporting period.



Implementation of the Environmental Strategy

The Environmental Strategy was not audited in this reporting period. One previous finding was closed.

Implementation of the Construction Environmental Management Plan

One (1) new finding was raised against the requirements of the CEMP; an Observation relating to notification of changes in relevant Australian Standards.

Two (2) findings were closed, and none (0) remained open at the end of the period.

Compliance with the Requirements of the Worksite Environmental Management Plans

Fifteen (15) findings were raised against the requirements of the WEMPs during the reporting period; no (0) Non-compliances, three (3) Areas for Improvement, and twelve (12) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. Controls related to dust generation, sediment control, and tracking of mud on to roads were not always adequate.

Twenty-three (23) findings were closed, and four (4) remained open.

The findings note the need for Spark to further develop environmental controls for site water management and mud tracking on to roads. Repeated findings relating to water management and mud tracking identified by the IREA audits indicate that Spark's on ground controls specified in the WEMPs, are not always effective and require attention.

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.

Thirteen (13) new findings were raised during the reporting period; two (2) Non-compliances, eight (8) Areas for Improvement, and three (3) Observations. The Non-compliances related to poor wastewater management leading to unpermitted dewatering to Banyule Creek, and mud tracking on roads. The remaining findings related to inadequate environmental controls at some works areas, and to unsatisfactory implementation of documented environmental management arrangements.

Eight (8) findings were closed in the reporting period, and seven (7) remained open.

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. However, package-wide issues were noted relating to the management of water on sites, and to mud tracking on to roads. Consistent with the repeated findings about on-ground controls for water and mud tracking, recurring findings for the implementation of related supporting management process indicate broader systemic areas for improvement.

Compliance with the Requirements of the Construction Compound Plans

No new findings were raised against the requirements of the CCPs. The one previous finding was 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.

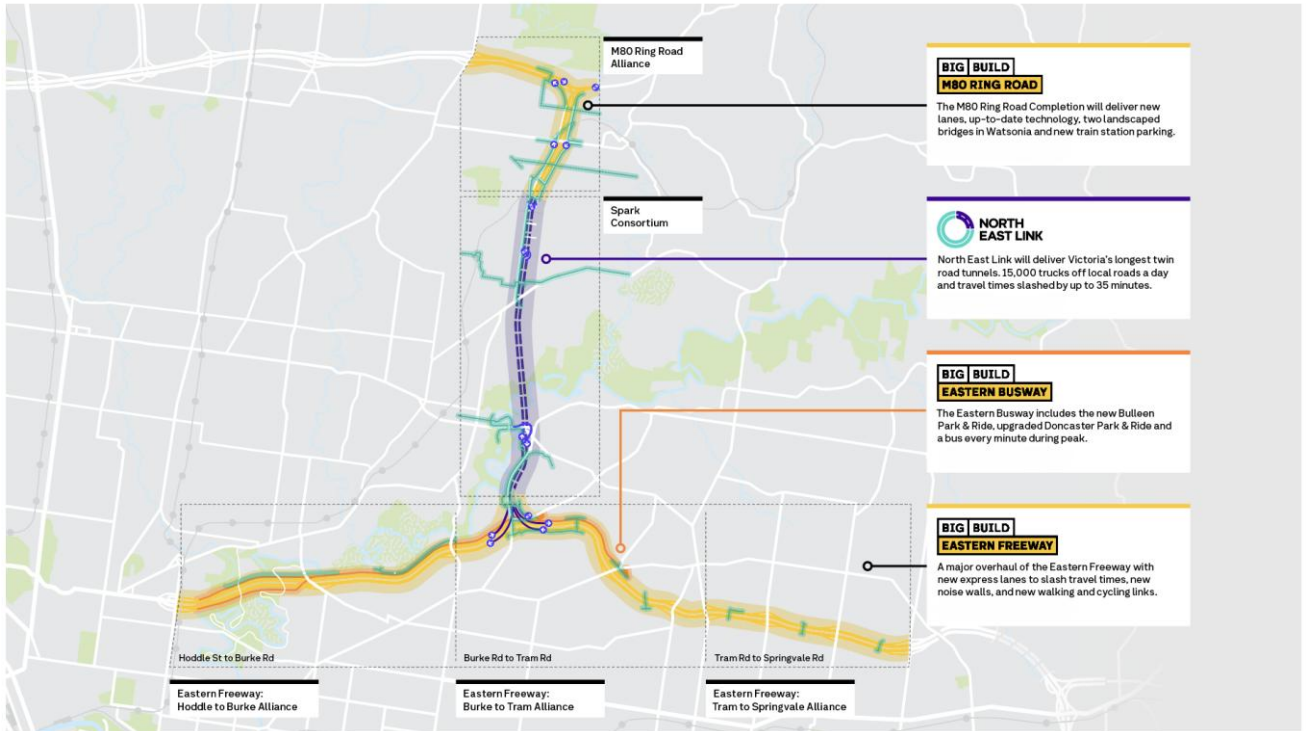


Figure 1: Schematic of the NEL works

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
- Templestowe 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
- Roadworks at Lower Plenty and Rivergum Walk, and other surface works at Lower Plenty.

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 undertaken through Sequential Excavation Method (SEM).

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 May to October 2025.



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.

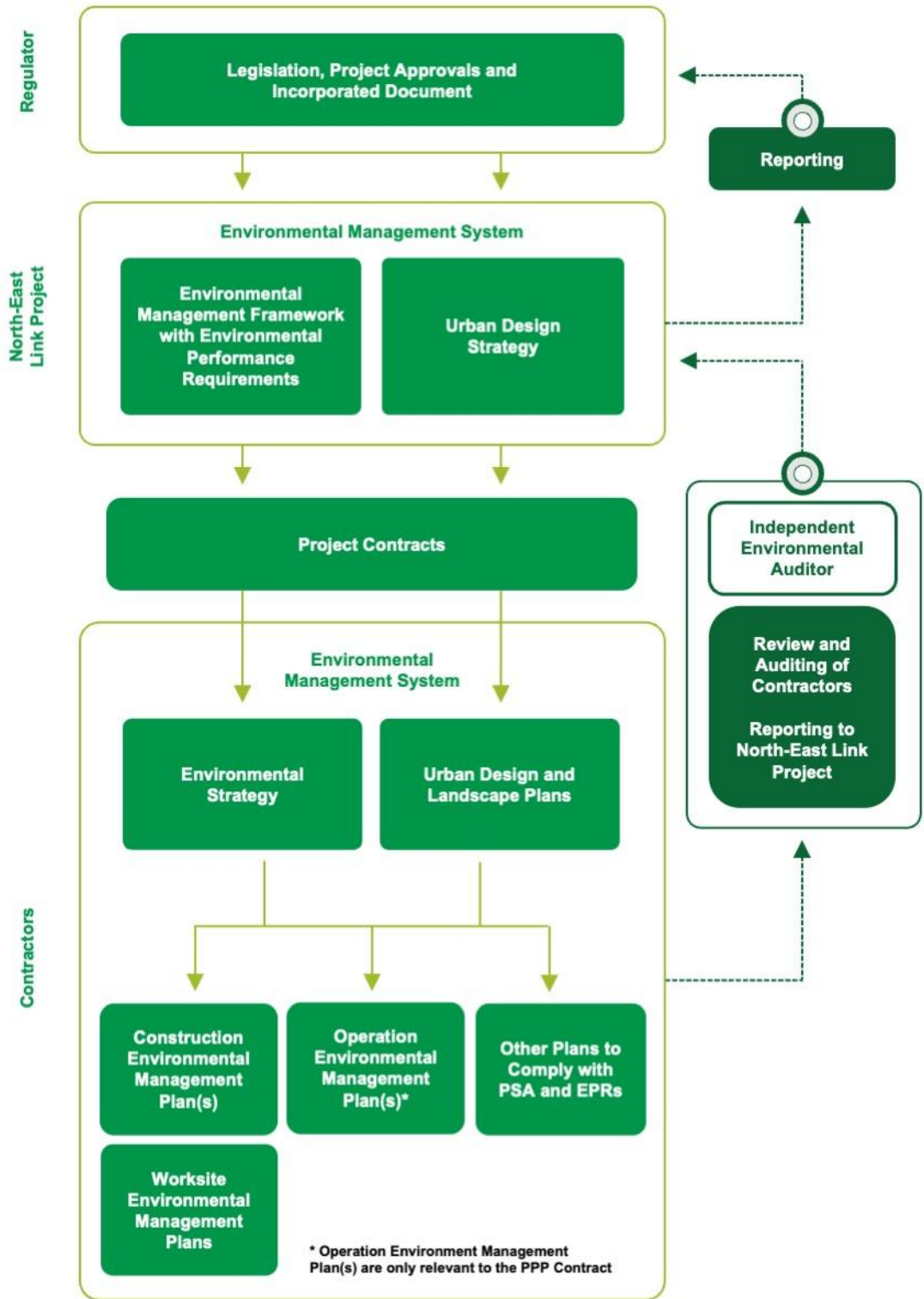


Figure 2: Environmental Documentation
(adapted from the EMF)



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 D&C must comply with 99 of these in whole or part, and NELP is responsible for compliance with all or part of 10 EPRs

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. Sixty-one (61) of the EPRs for which Spark is responsible were audited in the reporting period. One of these was audited twice. In addition, eight (8) EPRs for which NELP is wholly or partially 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
 - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
 - Worksite Environmental Management Plan – Watsonia Tunnels
 - Worksite Environmental Management Plan – Lower Plenty
 - Worksite Environmental Management Plan – Manningham
 - Worksite Environmental Management Plan – Bulleen.
- 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 – 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
 - Manningham North Construction Compound Plan
 - Motorway Control Centre 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 is audited at annually, or when there are material changes.
- 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 for higher risk environmental aspects, and less frequently for lower risk environmental aspects
- 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 CEMP Sub Plans or other plans required by the EPRs). 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 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 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	June 25 (Quarterly)	July 25 (WEMP)	Aug 25 (WEMP)	Sept 25 (Quarterly)	Oct 25 (NELP EPRs)	Oct 25 (WEMP)
EPRs (as scheduled)	✓			✓	✓	
Environmental Strategy						
Construction Environmental Management Plan	✓ (selected elements)			✓ (all applicable elements)		
Management Plans required by the EPRs	✓ (selected plans)		Targeted SWMP audit	✓ (selected plans)		
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓		✓
Construction Compound Plans (CCPs)						

No audit was conducted in May 2025 due to a short working month in April. The May construction activities were included in the June audit scope.

The criteria for each audit were derived from the NELP and Spark environmental documentation in scope as given above in section 2.4.

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
June 2025	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation and at the Silk Street bridge • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
July 2025	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours



Audit date	Construction activities
	<ul style="list-style-type: none"> • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation and at the Silk Street bridge • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
August 2025	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation and at the Silk Street bridge • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
September 2025	<ul style="list-style-type: none"> • Site civil works including road diversions • Piling, D-Walling, and concrete pours noting that all D-Walls have been installed and the demobilisation of associated work crew and equipment was underway • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment



Audit date	Construction activities
	<ul style="list-style-type: none"> • Works at Rivergum Walk as part of the Eel Bridge installation and at the Silk Street bridge • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Trawalla logistics yard and the Templestowe logistics yard (Paddles).
October 2025	<ul style="list-style-type: none"> • Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Works at Rivergum Walk as part of the Eel Bridge installation and at the Silk Street bridge • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards.



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 May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	2	2	4	0
Afl	9	14	16	7
O	7	16	18	5
Total	18	32	38	12

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

A total of thirty-two (32) audit findings were raised comprising two (2) Non-compliances, fourteen (14) Areas for Improvement, and sixteen (16) Observations.

The highest number of audit findings were raised in the June 2025 quarterly audit (see Figure 4)

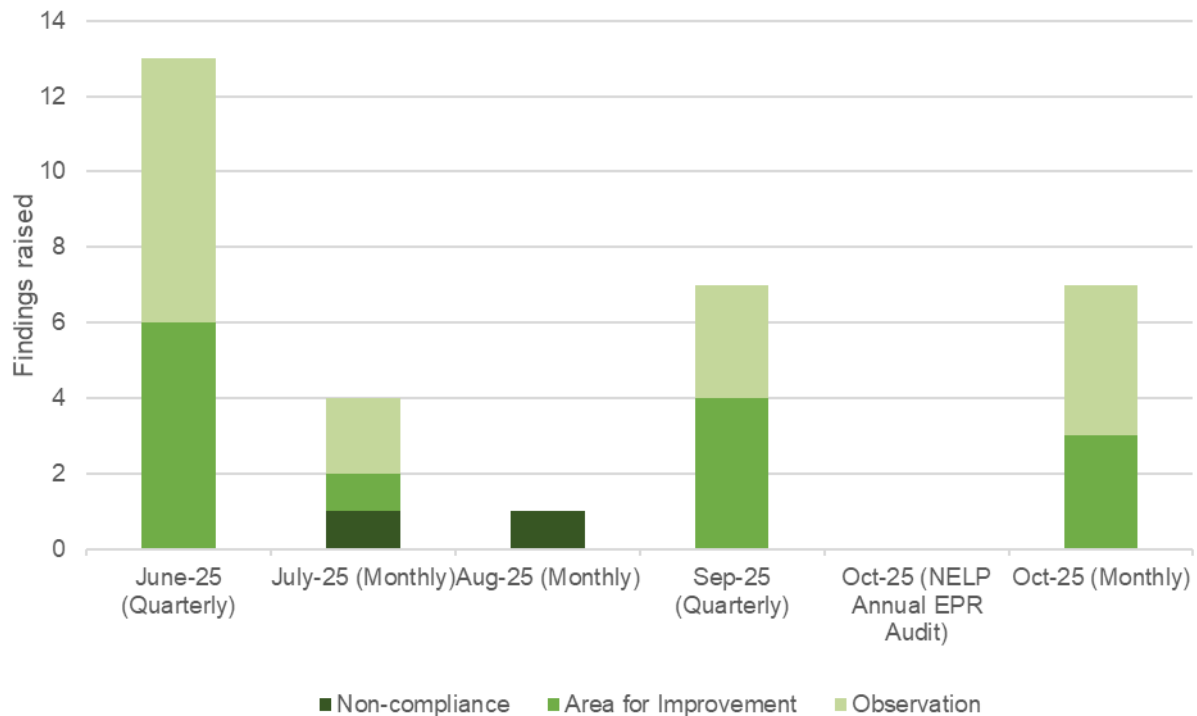


Figure 4: Audit findings by type and audit date during the reporting period



The overall number of audit findings raised in this reporting period has decreased compared to the last reporting period. This is demonstrated by the moving average determined over two reporting periods (i.e. average of the first and second reporting periods, second and third reporting periods, third and fourth reporting periods, and so on) (see Figure 5).

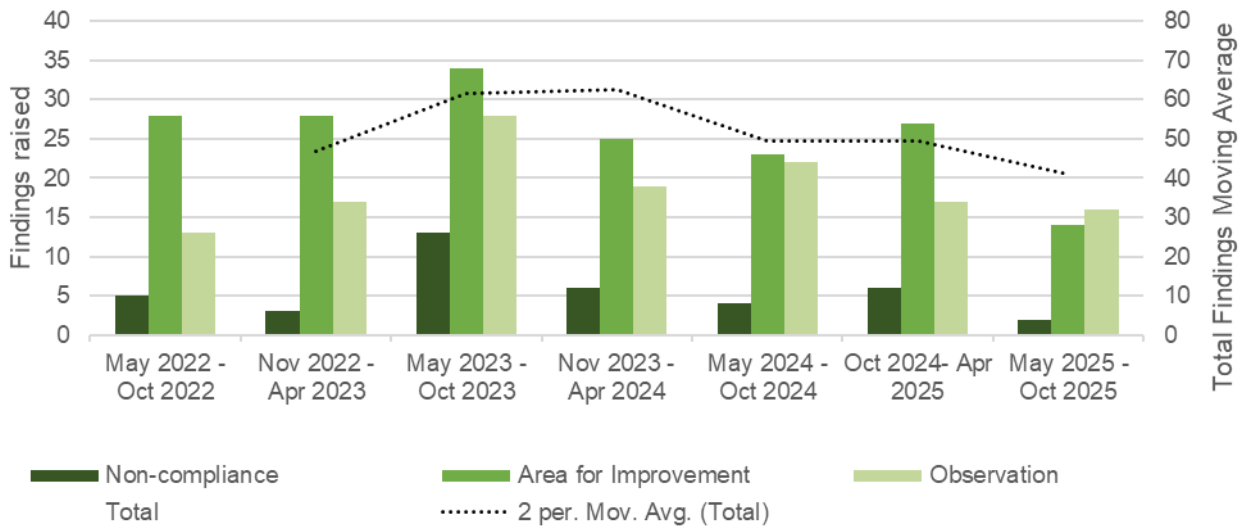


Figure 5: Audit findings by classification and reporting period Project commencement to October 2025.

Spark D&C established corrective actions to address audit findings. Thirty-eight (38) findings were closed during the reporting period. Twelve (12) findings remained open at the end of the reporting period. (See Figure 6).



Figure 6: Cumulative audit findings raised and closed - Project commencement to October 2025

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

NELP audit

The responsibility for the implementation of some EPRs is split between the State (through NELP) and Spark D&C. Eight (8) of the ten (10) EPRs for which NELP may be wholly or partially responsible were audited in relation to the Central Package activities. The two EPRs not audited were excluded as there had been no change since the last time these EPRs were audited.

No findings were raised.

Spark Audits

All sixty-one (61) planned and applicable EPRs for which Spark is responsible, and as agreed with NELP and Project Co were audited for the period. This represents over 60% of the applicable EPRs. At least one EPR from each of the 17 EPR categories was included in the six-month period and one EPR was audited twice.

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.

Three (3) findings were raised against the requirements of the EPRs, all Areas for Improvement. These findings related to chemical storage, and unneeded lighting during the day. Three (3) findings were closed, and one (1) finding remained open at the end of the reporting period (see Table 4). Findings may be raised against EPRs in audits outside of formal EPR audits, where relevant. One of the EPR findings in this reporting period was raised during a monthly WEMP audit.

In general, the findings are related to minor, but project-wide inadequacies in site environmental management and do not represent a material risk to the environment.

Table 4: Summary of EPR audit findings May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	1	0	1	0
Afl	0	3	2	1
O	0	0	0	0
Total	1	3	3	1

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 7 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. 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 7: EPR audit findings by EPR category May to October 2025

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, even if the environmental aspect is not included in the EPRs in scope for the audits.



4.5 Implementation of the Environmental Strategy

The Environmental Strategy was not audited in the reporting period. One open finding was closed, and no findings remained open at the end of the reporting period (see Table 5).

Table 5: Environment Strategy audit findings May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	0	0	0	0
Afl	1	0	1	0
O	0	0	0	0
Total	1	0	1	0

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 June 2025, and an audit of all applicable elements was conducted in September 2025. One (1) new audit finding was raised comprising an Observation. The finding was 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 May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	0	0	0	0
Afl	1	0	1	0
O	0	1	1	0
Total	1	1	2	0

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

Two (2) audit findings were closed; no (0) Non-compliances, one (1) Area for Improvement, and one (1) Observation. No (0) 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. Fifteen (15) findings were raised against the requirements of the WEMPs during the reporting period; no (0) Non-compliance, three (3) Areas for Improvement, and twelve (12) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting the construction activities, changed configurations in work sites, and to process implementation issues.

Spark made good progress in addressing the findings, with twenty-three (23) previous findings closed and four (4) remaining open (see Table 7).

Table 7: WEMP audit findings May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	0	0	0	0
Afl	6	3	8	1
O	6	12	15	3
Total	12	15	23	4

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 selected based on risk, were audited in June and September 2025. A targeted audit of the Surface Water Management Plan was conducted in August 2025 to focus on Spark’s management site water.

Thirteen (13) new findings were raised during the reporting period; two (2) Non-compliances, eight (8) Areas for Improvement, and three (3) Observations (see Table 8).

Both the Non-compliances were raised against the requirements of the SWMP for uncontrolled and/or 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 May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	0	2	2	0
Afl	1	8	4	5
O	1	3	2	2
Total	2	13	8	7

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



4.9 Implementation of Construction Compound Plans

No CCPs were formally audited in the reporting period. One finding was closed during the reporting period. See Table 9

Table 9: CCPs findings May to October 2025

Finding Type	Open at start of May 2025 - Oct 2025 period	Raised during May 2025 - Oct 2025 period	Closed during May 2025 - Oct 2025 period	Open at end of May 2025 - Oct 2025 period
N	1	0	1	0
Afl	0	0	0	0
O	0	0	0	0
Total	1	0	1	0

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



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 findings against the requirements of the WEMPs (largely related to on-ground controls) has decreased but continued to make up about half of the total findings raised. The number and the nature of WEMP-related findings correspond with the scope and complexity of construction activities.

However, the findings also note the need for Spark to further establish commensurate environmental controls and maintain these controls for effectiveness. The number of findings related to water management on site, and to mud tracking on to roads adjacent to the construction sites indicate that Spark requires additional focus on these environmental aspects.

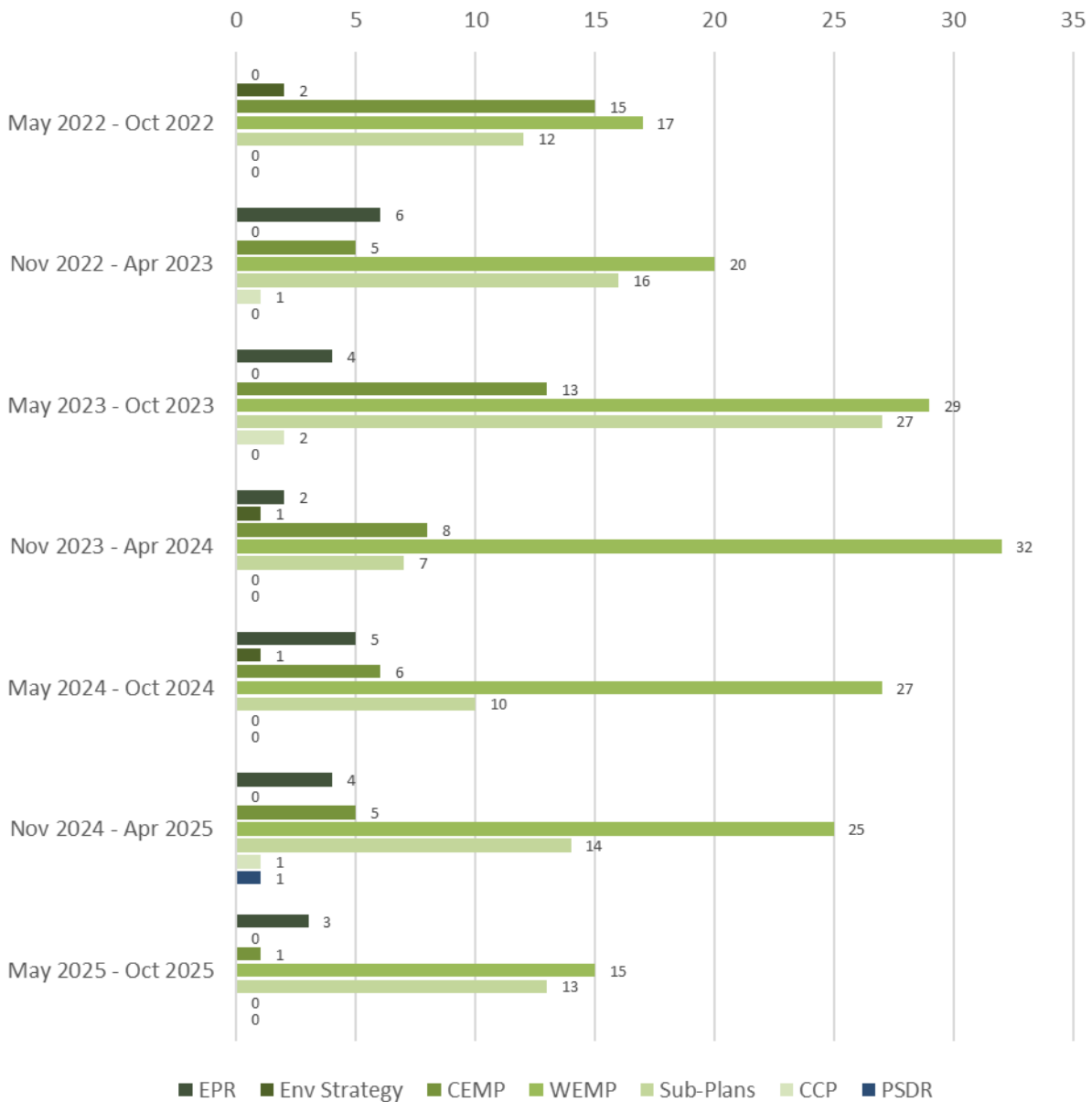


Figure 8: Audit findings by reporting periods



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

Overall, the requirements of the EPRs audited for both NELP and Spark were met.

In general, the findings raised against the EPRs for which Spark is responsible are related to minor, but project-wide inadequacies in site environmental management and do not represent a material risk to the environment.

The number of findings raised against EPRs has reduced slightly relative to the previous reporting period (see Figure 8).

5.3 Implementation of the Environmental Strategy

The Environmental Strategy provides an adequate framework for environmental management. The Environmental Strategy was not audited in the six month reporting period.

The number of findings raised against the Environment Strategy has remained low in each reporting period (see Figure 8).

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.

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.

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 8).

Spark D&C continued to address these findings. There is a 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 of the EMF and the PSDR. However, they remain complex documents for managing site environmental management. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting the nature of the construction activities, and to process implementation issues.

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

The number of findings against the WEMPs has decreased from previous reporting period and make up about half of the total findings raised (see Figure 8).

The findings note the need for Spark to further develop environmental controls for site water management and mud tracking on to roads. Repeated findings relating to water management and mud tracking identified by the IREA audits indicate that Spark's on ground controls specified in the WEMPs, are not always effective and require attention.

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.

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

The number of audit findings against the requirements of the Sub-Plan increased from the previous reporting periods (see Figure 8)

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. However, package-wide issues were noted relating to the management of water on sites, and to mud tracking on to roads. Consistent with the repeated findings about on-ground controls for water and mud tracking, recurring findings for the implementation of related supporting management process indicate broader systemic areas for improvement.

5.7 Compliance with the requirements of the Construction Compound Plans

The development of Construction Compound Plans (CCPs) to the satisfaction of the Minster for Planning is required by the Incorporated Document. No new audit findings were raised against the requirements of the approved CCPs and the open previous audit finding was closed.

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

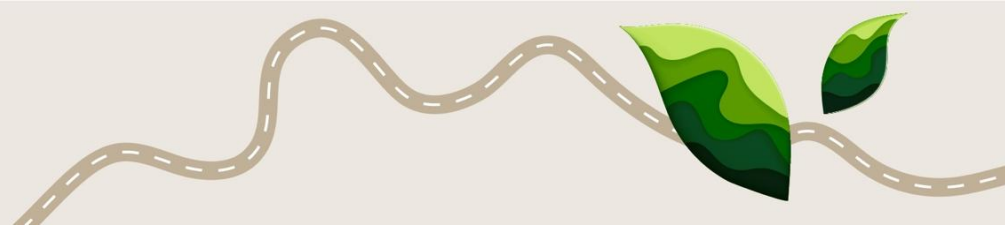


Appendix 1 – EPRs audited in the reporting period

Audit date	EPRs audited	
June 2025	Environmental Management (EMF)	EMF4
	Aboriginal Cultural Heritage (AH)	AH1
	Air Quality (AQ)	AQ1
	Arboriculture	AR1, AR3
	Business (B)	B4, B7, B8
	Contamination and Soil (CL)	CL4, CL5
	Flora and Fauna (FF)	FF2, FF3, FF4, FF5, FF6, FF9
	Groundwater (GW)	GW4
	Historical Heritage (HH)	HH4, HH5
	Noise and Vibration (NV)	NV3, NV4, NV15
	Social and Community	SC3, SC4
	Surface Water (SW)	SW1, SW2, SW5
	Sustainability and Climate Change (SCC)	SCC1, SCC2
Traffic and Transport (T)	T1, T2, T3	
September 2025	Environmental Management (EMF)	EMF1, EMF2
	Air Quality (AQ)	AQ2, AQ3
	Business (B)	B1, B5, B6
	Contamination and Soil (CL)	CL2, CL3
	Flora and Fauna (FF)	FF1
	Ground movement (GM)	GM1, GM2, GM3
	Groundwater (GW)	GW1
	Historical Heritage (HH)	HH1, HH3
	Land Use Planning (LP)	LP1, LP4
	Landscape and Visual (LV)	LV3
	Noise and Vibration (NV)	NV5, NV8, NV9
	Social and Community	SC5, SC6
	Surface Water (SW)	SW3, SW7, SW13
Sustainability and Climate Change (SCC)	SCC4	
Traffic and Transport (T)	T5	



October 2025	Environment Management (EMF)	EMF2, EMF4
(NELP audit)	Aboriginal Heritage (AH)	AH1
	Business (B)	B4
	Flora and Fauna (FF)	FF1
	Social and Community (SC)	SC2
	Sustainability and Climate Change (SCC)	SCC1, SCC2



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

No findings were raised against the requirements of the Environmental Strategy during the reporting period.

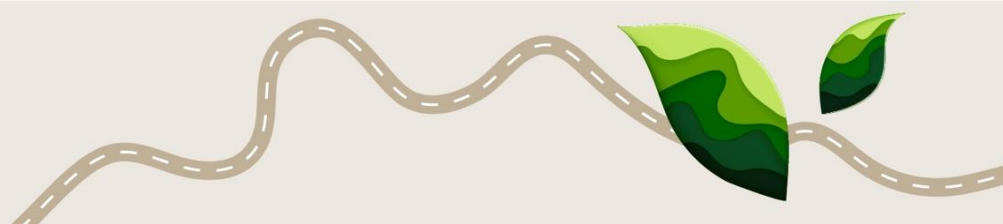


Table 11: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jun-25	IEA-0625-01	Afl	EPR SCC2 Minimise greenhouse gas emissions: Lights at work sites in the north and south were on during the day	At subsequent audits lights were observed to be switched off. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Aug-25
Jul-25	IEA-0725-02	Afl	EPR CL5: Several unbanded containers of hazardous chemicals were observed without appropriate secondary containment controls across the north and south construction sites.	At several subsequent audits storage of fuels and chemicals was observed to be unsatisfactory. Spark undertook actions to control the management and storage of fuels and hazardous chemicals which resulted in an improvement. This finding was closed and site specific related findings were raised. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Oct-25
Oct-25	IEA-1025-01	Afl	EPR SCC2 Minimise greenhouse gas emissions: Lights connected to mains power at work sites in the north and south were on during the day.	At subsequent audits lights were observed to be on across sites during the day time. This finding related to on-site environmental controls and represented a low risk to the environment.	Open	

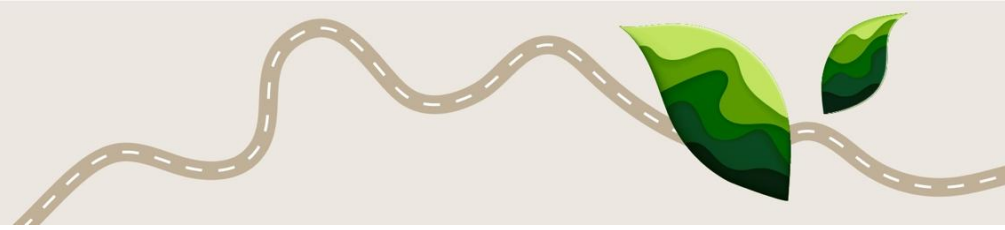


Table 12: Summary of audit findings against the CEMP

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-25	IEA-0625-02	O	CEMP 4.4 Standards: The Spark Environment Team does not reliably receive notification of any changes in relevant Standards.	At the next audit evidence of updates received from Quality Team were sighted. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-25

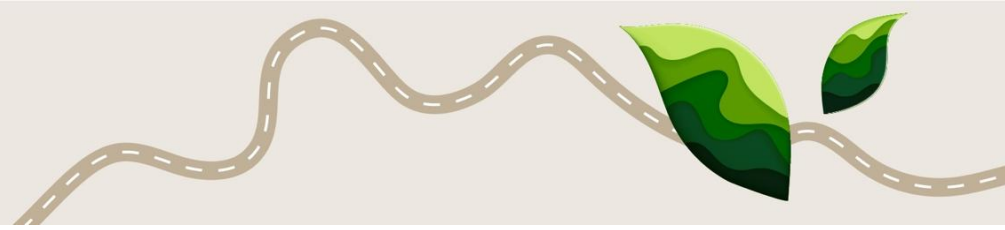


Table 13 Summary of findings against the PSDR

No findings were raised against the PSDR in the reporting period, and no previous audit findings were open.

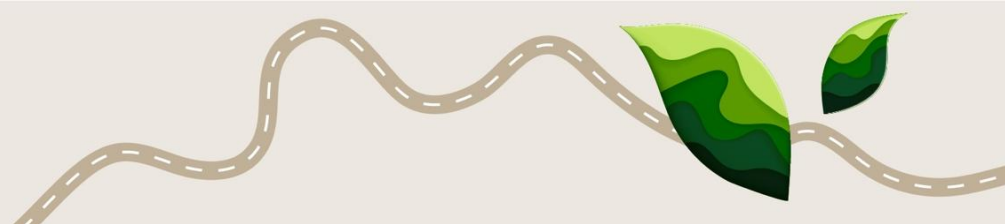
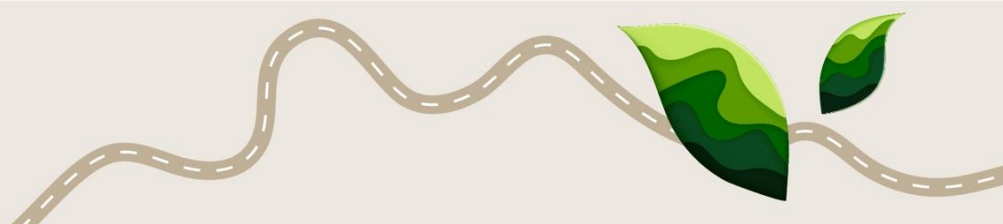
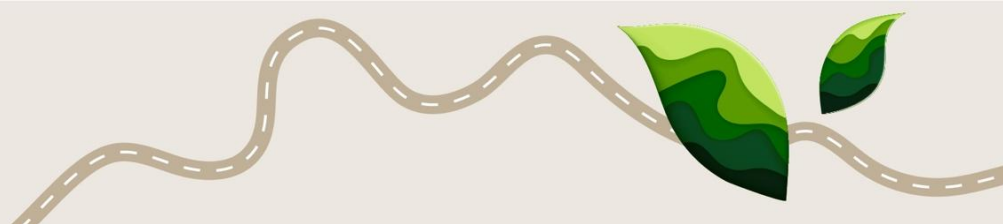


Table 14: Summary of audit findings against the WEMPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jun-25	IEA-0625-08	O	WEMP-20 Winsor Reserve 9 Environmental Aspects – Surface Water: Minor quantities of mud tracking and sediment observed on GBR from vehicles leaving the Spoil Shed.	At a subsequent audit it was observed that the exit from Winsor reserve had been cleaned. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-25
Jun-25	IEA-0625-09	O	WEMP 31 Watsonia Tunnel 9 Environmental Aspects – Contamination and Spoil: Chemicals stored near the AMCC settling tanks including the flocculant IBC were not adequately bundled.	At a subsequent audit it was observed that chemicals in this specific area were appropriately stored. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-25
Jun-25	IEA-0625-10	Afl	WEMP 32 Lower Plenty 9 Environmental Aspects: Contamination and Soil: The excavated clean fill stockpile at Lower Plenty was not fully stabilised and not all dust mitigation controls were implemented to prevent the potential for offsite dust emissions.	The fill material stockpile at Lower Plenty was stabilised with polymer during the subsequent audit period. Further shaping and tracking and rolling of the stockpile had also been completed. No visible raised dust was observed, noting that light rain was present during the site inspection. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-25
Jun-25	IEA-0625-11	O	WEMP 33 Manningham 9 Environmental Aspects – Contaminated Land: Unbundled chemical drums (diesel) and IBCs (concrete compound) observed at MCC building surface works and Bulleen C&C piling pad decommissioning areas respectively.	At the next audit it was observed that there were no dangerous goods observed outside of the storage areas near the MCC works. Other DGs were observed outside of bundled areas. This finding was closed and a site specific finding was raised. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jul-25
Jun-25	IEA-0625-12	O	WEMP 34 Bulleen 7 Site Inspection and Monitoring: The environmental event resulting in Styrofoam in the sedimentation basin at Trinity Lake was not managed via Synergy (including action tracking)	At the next audit the incident notification was sighted. Efforts to remove the Styrofoam from the dam had commenced and a filter was installed to prevent further ingress of Styrofoam.	Closed	Jul-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				This finding related to on-site environmental controls and represented a medium risk to the environment.		
Jun-25	IEA-0625-13	Afl	WEMP 34 Bulleen 9 Environmental Aspects –Surface Water: Controls to manage mud tracking at Gate B2 had been removed for cleaning and not reinstated prior to the gate resuming operation.	At the next audit it was observed that the Gate B2 rumble grids had been reinstated This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-25
Jul-25	IEA-0725-03	O	WEMP 33 Manningham 9 Environmental Aspects – Surface Water: The current placement of the FOD mats at gate M5 did not prevent some mud tracking from vehicles leaving the site.	At the next audit it was observed that the FOD mats had been replaced with rumble grids at the M5 gate and mud tracking had improved. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-25
Jul-25	IEA-0725-04	O	WEMP 34 Bulleen 9 Environmental Aspects –Surface Water: Minor mud tracking was observed along the Bulleen Road south bound lanes.	At the next audit it was observed that the mud tracking along Bulleen Road was much improved. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Aug-25
Sep-25	IEA-0925-05	O	WEMP 20 9 Environmental Aspects – Contamination and Spoil: An unreported minor oil leak was observed from a front-end loader parked in laydown area outside the Winsor spoil shed.	An incident report was raised for the minor oil leak. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-25
Sep-25	IEA-0925-06	O	WEMP 34 9 Environmental Aspects – Contamination and Spoil: Empty acid containers were observed incorrectly disposed in a waste bin near the Trinity North SEM WTP.	At the next audit it was observed that the empty containers had been appropriately disposed. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Oct-25
Sep-25	IEA-0925-07	O	WEMP 34 9 Environmental Aspects Surface Water Management: The sediment drain warden for a stormwater drain near the former bentonite plant was damaged.	At the next audit it was observed that the drain had been blocked and the area, formerly occupied by the bentonite plant, had been paved for the new on-site carpark.	Closed	Oct-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				This finding related to on-site environmental controls and represented a medium risk to the environment.		
Oct-25	IEA-1025-04	O	WEMP 31 9 Environmental Aspects – Contamination and Spoil: Minor quantities of unbanded chemical containers were observed incorrectly stored near the AMCC area.	<p>Actions to address this finding were not complete during the reporting period.</p> <p>This finding related to on-site environmental controls and represented a low risk to the environment.</p>	Open	
Oct-25	IEA-1025-05	O	WEMP 32 9 Environmental Aspects – Contamination and Spoil: Drums of unbanded hydraulic oil were observed at Watsonia.	<p>Actions to address this finding were not complete during the reporting period.</p> <p>This finding related to on-site environmental controls and represented a low risk to the environment.</p>	Open	
Oct-25	IEA-1025-06	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: A small area of the egress road downstream of the wheel wash at GB07 was unsealed – leading to some mud tracking.	<p>Actions to address this finding were not complete during the reporting period.</p> <p>This finding related to on-site environmental controls and represented a low risk to the environment.</p>	Open	
Oct-25	IEA-1025-07	Afl	WEMP 33: 9 Aboriginal Cultural and Historical Heritage: A Synergy event for the RAP inspection finding relating to CHMP 20374 Condition 6 for the installation of fencing to protection modern scar trees at Manningham near the 1350mm drain area, had not been recorded.	<p>Actions to address this finding were not complete during the reporting period.</p> <p>This finding related to on-site environmental controls and represented a low risk to the environment.</p>	Open	

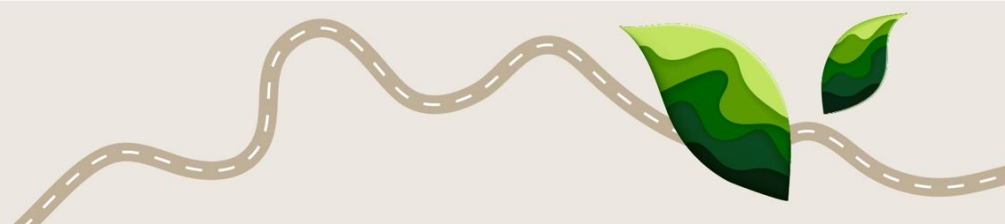
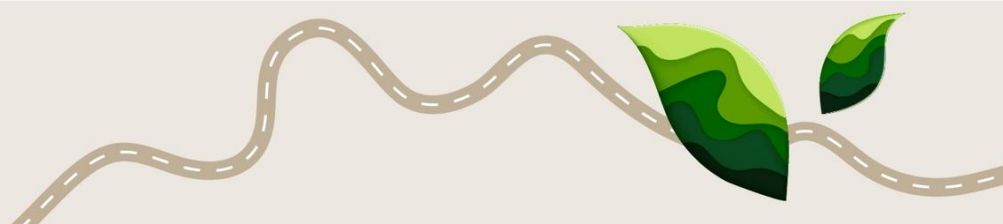
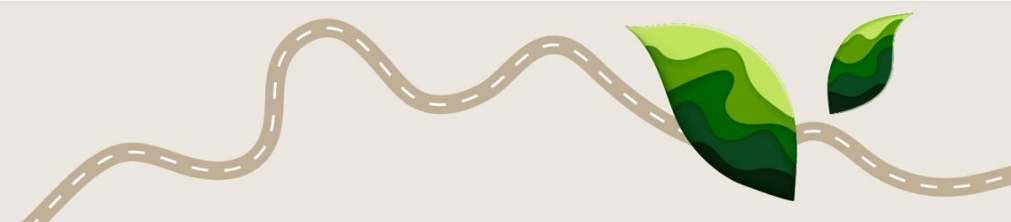


Table 15: Summary of audit findings against the Management Plans

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-25	IEA-0625-03	O	EcMP 7.5 Fauna protection: Cited WeBuild procedure MSP22F Noise, Vibration and Light Risk Management was not used or relevant for Spark.	Spark is revising the Ecology Management Plan and this associated procedure. This revision was not complete during the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-25	IEA-0625-04	Afl	GWMP 10 Construction Groundwater Monitoring: The process for managing recommendations or actions from the Trigger Level Assessments (TLAs) as part of the groundwater quality monitoring is unclear.	At the next audit Spark environmental team advised that tracking recommendations and actions from Trigger Level Assessments via a tracking spreadsheet had been updated This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-25
Jun-25	IEA-0625-05	Afl	TCRP 6.2.2 Canopy Assessment and Replacement: The processes required to support tree replanting principles including determination of the planting schedule, or managing replanting stocks were not fully established in the TCRP.	Processes to support tree replanting and stock management have been included in a revised TCRP. This had not been finalised in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-25	IEA-0625-06	Afl	TCRP 6.2.2 Canopy Assessment and Replacement: Process for tree planting had not established the ideal planting season to best ensure tree viability.	The TCRP had been revised to include processes for tree planting. This had not been finalised in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Jun-25	IEA-0625-07	O	TCRP 6.2.2 Canopy Assessment and Replacement: The design change notice DCN-SPK-0267 did not include the Landscape Drawing Package NEL-NTH-TRA-2299-ULS-DPK-8602: Landscape - SP Interface Zone North.	The Landscape packages have been added to the scope of the DCN-SPK-0267. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Jul-25	IEA-0725-01	N	SWMP 7 Environmental Controls: No ERSED controls were in place on the day of the audit leading to mud tracking on Greensborough Road from vehicles exiting via Lower Plenty gate GB07.	At the next audit it was observed that FOD mats and increased cleaning had been implemented to improve mud tracking from the Lower Plenty gate GB07. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Aug-25
Aug-25	IEA-0825-01	N	SWMP 6.3.3.1 Wastewater management: An uncontrolled discharge of dust suppression polymer solution from Lower Plenty was not in accordance with documented discharge procedures, leading to discoloured water draining to Banyule Creek.	After the audit it was advised by Spark that the spill had been contained and the affected area remediated. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Sep-25
Sep-25	IEA-0925-01	Afl	DAQMMP 7.1 Controls for Dust Emissions: Not all relevant controls identified Section 7.1 of the DAQMMP for stockpile management (CAQ08) have been implemented or documented as to why they have been deemed not reasonably practicable, for the fill material stockpile north of Lower Plenty Compound.	At the next audit it was observed that polymer had been applied to the large mudstone stockpiles at Lower Plenty. The stockpiles were adequately profiled with access arranged to minimise dust entrainment. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Oct-25
Sep-25	IEA-0925-02	Afl	GWMP 10.1 Groundwater Monitoring Requirements: The Groundwater Well Master Spreadsheet did not contain relevant information or a clear link to where this information was recorded. Examples of this information included changes to the monitoring programs resulting from CRFI outcomes, consultants' recommendations, decommissioned wells or damage to wells.	An updated version of the Groundwater Well Master Spreadsheet was shared with NELP and IREA. The spreadsheet was updated to include the information required. The spreadsheet will continue to be revised as CRFIs are addressed and closed. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Oct-25
Sep-25	IEA-0925-03	Afl	SMP 2.3 Sustainability objectives and targets: Actions to meet the 60% office waste landfill diversion target (CE E.4) have not been fully implemented or effective.	The landfill diversion target continued to be tracked but further action was required to meet the target. 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
Sep-25	IEA-0925-04	Afl	SMP 2.3 Sustainability objectives and targets: Systems to measure baseline and actual quantity of organic waste have not been fully established to meet the 50% landfill reduction target (CE F.1).	<p>Actions required to establish the baseline and quantity of organic was landfill reduction target had not been implemented in the reporting period.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Oct-25	IEA-1025-02	O	Ecology Management Plan (Appendix E): Not all information contained in the Kangaroo Management Procedure was current.	<p>Actions to address finding are included in an update to the EcMP which was in the formal review cycle during the reporting period.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Oct-25	IEA-1025-03	Afl	SWMP 6.3.3 Stormwater and Dewatering Management: A permit for the mechanical diversion of stormwater for the existing ongoing stormwater diversion at Lower Plenty and at Bulleen have not been raised as per the recently revised Spark Dewatering and Discharge procedure (MSP022P Rev 3).	<p>Actions to address this finding were not complete during the reporting period.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	

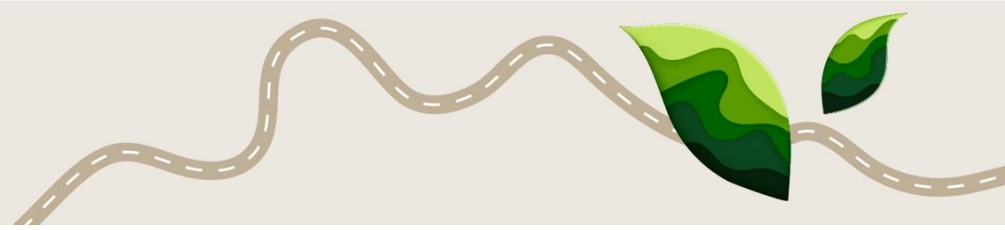


Table 16: Summary of audit findings against the CCPs

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

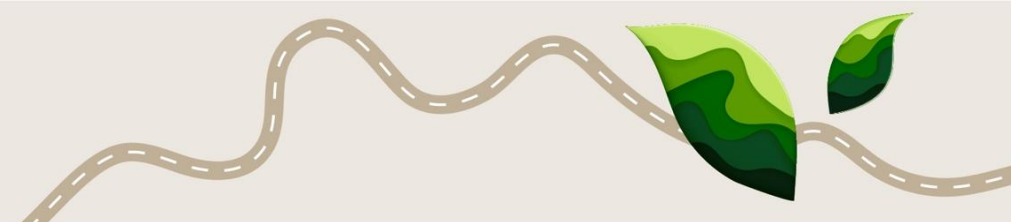
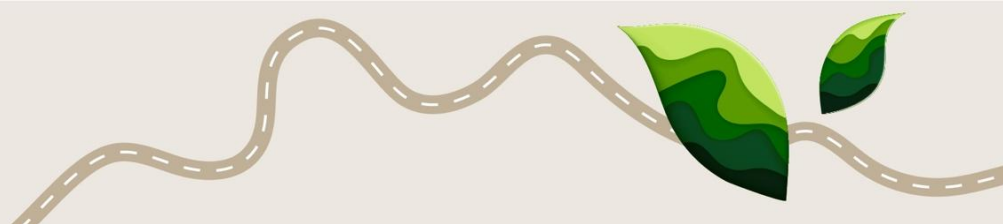
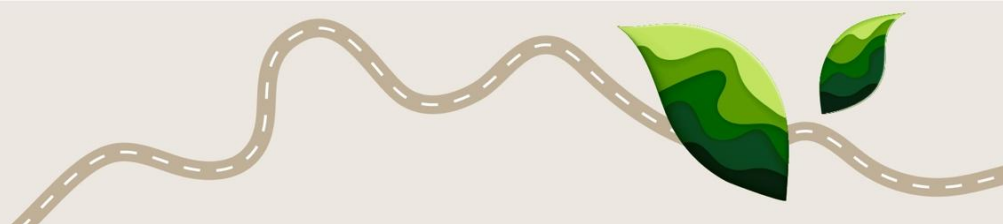


Table 17: Previous open audit findings

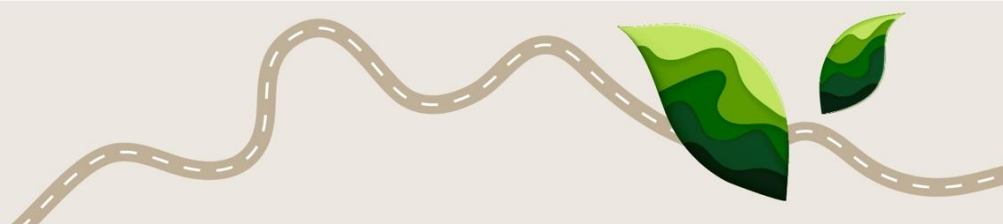
Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Sep-24	IEA-0924-01	Afl	Environmental Strategy 3.3 Roles and Responsibilities: The roles and responsibilities defined in the Environmental Strategy do not align with actual discharged roles and responsibilities.	The Environmental Strategy (Rev 1) had been updated, verified by the IREA and issued for use. The roles and responsibilities had been updated. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-25
Dec-24	IEA-1224-10	Afl	WEMP-18 9.1 Site Environmental Plans: Paddles Laydown Yard. Environmental controls were not installed for sediment and erosion control as per SEP.	Spark has completed a review of environmental controls for Paddles. The SEP has been revised, and on-site controls are now installed as per the revised SEP. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Dec-24	IEA-1224-12	Afl	WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water: Not all ERSED controls at Lower Plenty were in place or effective to prevent mud tracking on Greensborough Road.	This finding was closed and replaced with a non-conformance as new finding IEA-0725-01. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jul-25
Feb-25	IEA-0225-01	N	EPR T2: Spark has not implemented all measures to minimise impacts on local streets, community and commercial facilities by providing parking for construction workers at construction compounds where practicable.	Measures to minimise impacts on local streets were proposed and implementation was underway. Engagement with workforce and local councils to work through parking and worker behaviour was also implemented. Manningham City Council commenced implementation of parking restrictions to benefit residents. Spark has arranged additional parking at Bulleen and through commercial agreements with the Veneto Club and a local parking provider. The compound for the MCC works area at Manningham was approved by the Manager Transport Projects (Acting) Infrastructure Assessment under delegation from the Minister for Planning on 11 Aug 2025.	Closed	Sep-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
				Additional parking measures were also underway including a new car park at the former Bulleen bentonite plant which will accommodate approximately 160 parking spaces. This finding related to on-site environmental controls and represented a medium risk to the environment.		
Mar-25	IEA-0325-03	Afl	CEMP 9.5.1 Corrective and Preventive Actions: Tracking of preventative and corrective actions for findings other than non-compliances was not being completed in accordance with the documented processes in the CEMP and MSP169-NEL EMS	An internal audit tracking register has been implemented to track internal and external audit findings. Additional registers have been implemented to track actions raised by other methods, including monitoring and inspections. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jun-25
Mar-25	IEA-0325-10	Afl	SMP 2.3 Objectives and Targets: The methodology used in the Spark Urban Heat Island Report (Rev 3) and the impact study outcomes were not consistent with the sustainability target specified in the SMP (Table 3) of no net increase in the % change in average temperature	Revision 3 of the SMP has been finalised with the updated heat island target. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Aug-25
Mar-25	IEA-0325-12	O	DAQMMP 9.1.2 Monitoring program: The weather monitoring station at Watsonia was not integrated into the monitoring program, noting that data from the nearest Bureau of Meteorology was used being as a temporary proxy.	The DAQMMP has been revised and issued for use as Rev 5. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Jul-25
Apr-25	IEA-0425-01	O	WEMP-20 Winsor 9.0 Environmental Aspects – Contamination and Spoil: An unbanded hydrocarbon container was observed at Winsor.	At the next audit adequate bunding and storage of chemicals at Winsor was observed. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-02	N	CCP-002 Watsonia TBM Compound or WEMP-0031 Watsonia Tunnels 2.3 Key Approvals: The Watsonia	The Watsonia TBM construction compound plan (CCP2) was approved by the Minster for Planning on 19 June 2025	Closed	Jul-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
			TBM construction compound had been expanded without an approved CCP.	This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Apr-25	IEA-0425-03	Afl	WEMP-31 Watsonia Tunnels 7.1 Environmental Monitoring Management Plan (Noise): The compliance noise monitors NEL01 and NEL12 were offline and not reporting.	At the next audit it was observed that the noise monitors had been calibrated and installed. A review of their location was underway in line with changes to construction activities. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-04	O	WEMP-32 Lower Plenty 9 Environmental Aspects Contamination and Spoil: A spoil truck was observed leaving site with an uncovered load.	All trucks observed leaving during the next audit had covered loads. Sighted an incident to contact spoil haulage trucks with toolbox information provided to the sub-contractors. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-05	Afl	WEMP-32 Lower Plenty 9 Environmental Aspects – Noise and vibration: Protective noise blankets to mitigate noise emissions from the desanding plant generators were not properly installed or maintained.	At a subsequent audit noise blankets had been reinstated on the desanding plant. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-06	O	WEMP-32 Lower Plenty 9 Environmental Aspects: Noise and Vibration: An elevated work platform at Lower Plenty was observed in use with a tonal reverse beeper.	At the next audit it was observed that a new squawker had been fitted. Communication from the environment team reminding personnel to use broad band squawkers was undertaken. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-07	Afl	WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water: Installation of the FOD mats at gate GB06 and the Rivergum (Zone 3) exit were inadequate.	At the next audit it was observed that FOD mats at gate GB06 and at the Rivergum (Zone 3) exit had been installed. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Apr-25	IEA-0425-08	O	WEMP-32 Lower Plenty 9 Environmental Aspects – Surface Water: The Lower Plenty water treatment plant bund drainage valves were all in the open position.	At the next audit it was observed that the Lower Plenty water treatment plant bund drainage valves were closed. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-09	O	WEMP-34 Bulleen 9.0 Environmental Aspects – Contamination and Spoil: Diesel spillage was observed on the ground at the refuelling point of the self-bunded refuelling pod at Trinity South.	At the next audit it was observed that the diesel spill had been cleaned and reported. Additional controls had been installed, including a permanent bund and walk over grate to access refuelling point. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-10	Afl	WEMP-34 Bulleen 9 Environmental Aspects – Surface Water: Not all controls to manage mud tracking at gate B7 had been installed.	At the next audit it was observed that controls at Gate B7 were installed and operating. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Jun-25
Apr-25	IEA-0425-11	O	WEMP-34 Bulleen 7.1 Environmental Monitoring Management Plan (Surface Water): Post rainfall monitoring results for April had not been reviewed and verified to ensure accuracy and validity.	A Spark internal investigation was completed, with the water quality monitor calibrated and results checked. Further processes implemented to review and verify monitoring results as they are taken. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Jun-25



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