

Melbourne Metro Rail Project

PREPARED FOR METRO TUNNEL PROJECT OFFICE

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MAIN WORKS (TUNNELS AND STATIONS)
ENVIRONMENTAL AUDIT SUMMARY
REPORT 2025

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This document should be read in full and no excerpts are to be taken as representative of the findings.

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Glossary

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

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

1. Executive Summary

Major construction of the Metro Tunnel Project (MTP) and five (5) new stations have been completed. The MTP opened on 30 November 2025, creating a new end-to-end rail line from Sunbury in the west to Cranbourne/Pakenham in the south-east, with high-capacity trains and five (5) new underground stations.

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

This report has been developed to meet the VAGO recommendation and to provide the wider public with information of the Project's environmental performance for the Tunnels and Station package. Audits for the Tunnels and Station package are conducted quarterly, with the IEA also providing six-monthly summary audit reports. This report provides a summary of the IEA findings in the six-monthly summary audit reports and IEA Quarterly Audit (November 2025) applicable to the Tunnels and Stations Package.

The Project's Environmental Management Framework (EMF) requires an IEA to undertake environmental audits to assess Delivery Partner compliance with the EMF. The auditing process is designed to lead to continual improvement during projects - this is key to AS/NZS ISO 14001:2015 Environmental management systems — Requirements with guidance for use and best practice environmental management. As such, some observations were identified.

This report found that CYP addressed the audit findings in a timely manner related to the associated environmental management risk; therefore, audit findings improved CYP's systems and promoted better environmental outcomes. All key audit findings (e.g. observations) for the reporting period have been addressed by CYP and corrective actions implemented, with no open findings as of November 2025. The auditing program within the scope of this report identified that, in general, the works were undertaken in accordance with the requirements of the EMF, relevant Environmental Performance Requirements (EPRs) and the MTP Incorporated Document.

Major construction of the Metro Tunnel and the 5 new stations is complete, and the Project is operational, however, additional works for MTP will continue to take place in 2026, including works on the Town Hall Station precinct and other sites. These works present a low risk to the environment compared to the majority of MTP works and are generally related to site finishing. On this basis ongoing IEA audit summaries are unlikely to be required in the future.

2. Introduction

2.1 Purpose

Metro Tunnel Project (MTP) office is part of Victorian Infrastructure Delivery Authority (VIDA) that is responsible for delivering the state's transport infrastructure programs. MTP, previously known as Rail Projects Victoria (RPV), engaged Aurecon Jacobs Mott MacDonald Joint Venture (AJM JV) to prepare a summary report of the IEA audit reports for the MTP Main Works in 2025. This includes the following IEA quarterly audits: November 2024, February 2025, May 2025 and August 2025.

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

A subsequent VAGO audit (June 2022) on Melbourne Metro Tunnel Phase 2 for Main Works found that MTP and CYP had effective systems in place for monitoring compliance with environmental requirements and methodology to ensure corrective action is taken in a timely manner. The IEA notified VAGO that CYP has maintained high standards for environmental management and no non-conformances have been raised since February 2020.

2.2 Project Background

2.2.1 THE METRO TUNNEL PROJECT

Major construction of the MTP and five (5) new stations have been completed. The Victorian Government opened the MTP on 30 November 2025. The MTP connects the Sunbury line to the Cranbourne and Pakenham lines through new twin nine-kilometre rail tunnels and five (5) new underground stations. MTP has transformed Melbourne's rail network into an international-style metro system, boosting the capacity of the rail network to keep pace with Melbourne's growing population and rail patronage. Additional works for MTP will be taking place in some areas in 2026.

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

The infrastructure required for construction of MTP includes:

- Twin nine-kilometre rail tunnels from Kensington to South Yarra, connecting the Sunbury and Cranbourne/Pakenham railway lines through the CBD.
- Rail tunnel portals (entrances/exits) at Kensington and South Yarra.
- New underground stations at Arden, Parkville (under Grattan Street), State Library (at the northern end of Swanston Street), Town Hall (at the southern end of Swanston Street), and Anzac (under the Domain interchange on St Kilda Road). State Library and Town Hall stations will feature direct interchange with the existing Melbourne Central and Flinders Street Stations respectively.
- Train/tram interchange between Anzac Station and the Domain Interchange.
- High-Capacity Signalling to maximise the efficiency of the new fleet of High-Capacity Metro Trains (HCMTs) that will run along the Sunbury, Cranbourne/Pakenham lines and the Metro Tunnel in the future.

- Some project elements' nomenclature (e.g. station names) have changed during the delivery of the Project and audit findings may reflect superseded nomenclature, with the updated name provided in brackets.

2.2.2 MTP WORK PACKAGES

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

Construction of MTP is being delivered by VIDA on behalf of the Victorian Government in partnerships with contracted Delivery Partners; through four separate works packages with different delivery partner(s) for each works package described in Table 2.1. This report relates only to the Main Works: Tunnels and Stations Package.

TABLE 2-1 MTP WORKS PACKAGES

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

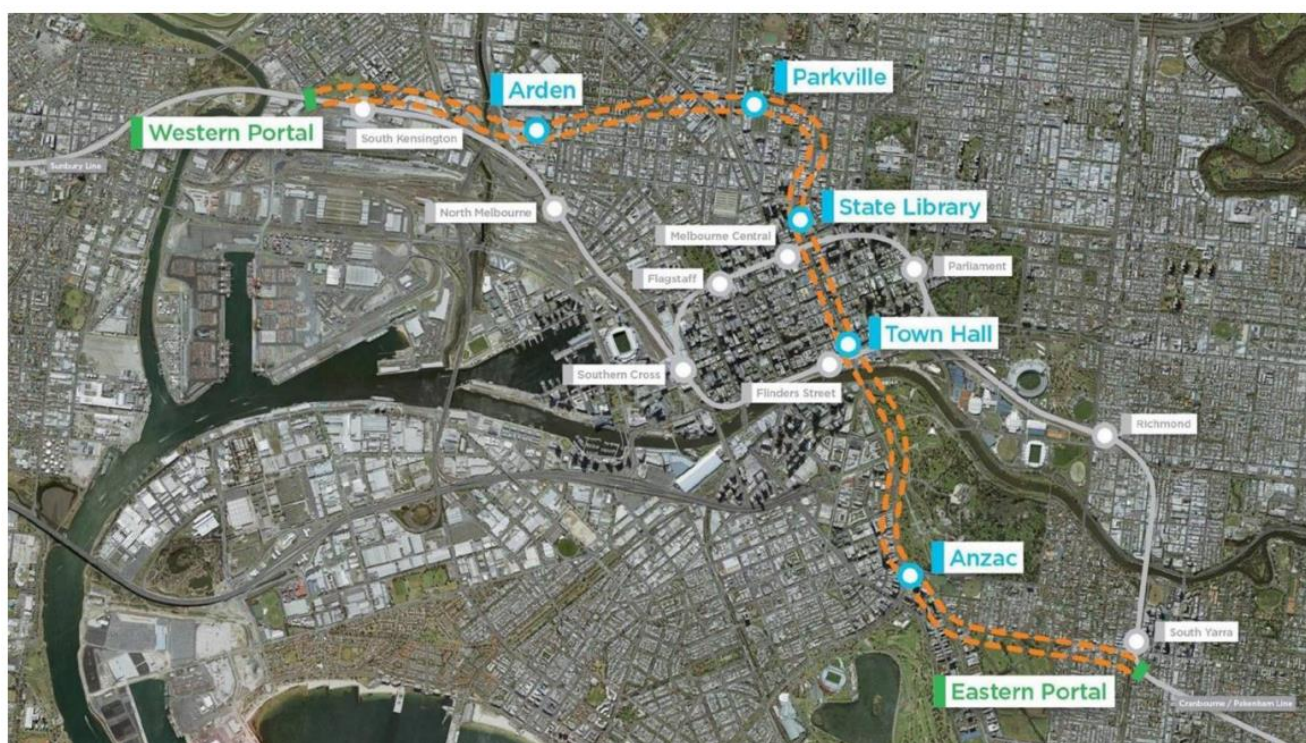


FIGURE 2-1 MTP SCHEMATIC PLAN

2.3 Scope

This report summarises environmental audits conducted as part of the MTP Main Works being delivered by CYP for the Tunnels and Stations Works Package. This report summarises the IEA Six-Monthly Audit Reports from March 2025 and September 2025 highlighted in Table 2.2. It covers all works conducted under the GC82 Melbourne Metro Rail Project Incorporated Document (May 2018) for the Tunnels and Stations Works Package of the MTP and the associated Melbourne Metro EMF.

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

TABLE 2-2 IEA AUDIT REPORTS IN SCOPE

PACKAGE	SCOPE	RELEVANT IEA REPORTS IN SCOPE
GC82 Tunnels and Stations (CYP)	Publish key findings for IEA Six-Monthly reports.	Helman Environmental Six-Monthly Summary Environmental Audit Reports: March 2025 and September 2025 (these cover the following IEA quarterly audits: November 2024, February 2025, May 2025 and August 2025). Additionally, the November 2025 quarterly audit report has been referenced in this report. This is to capture in the 2025 reporting period given the Project is now operational.

The following Packages are excluded from this report and will be covered in separate reports:

- Main Works carried out from 2018 to August 2024, addressed in separated IEA summary reports which have been completed and have been published on MTPs website.
- Works carried out by Rail Network Alliance (RNA); who were previously known as Rail Infrastructure Alliance and Rail Systems Alliance (reports published separately).

3. Environmental Management

3.1 Environmental Governance Framework

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

Each Delivery Partner is required to:

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

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

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

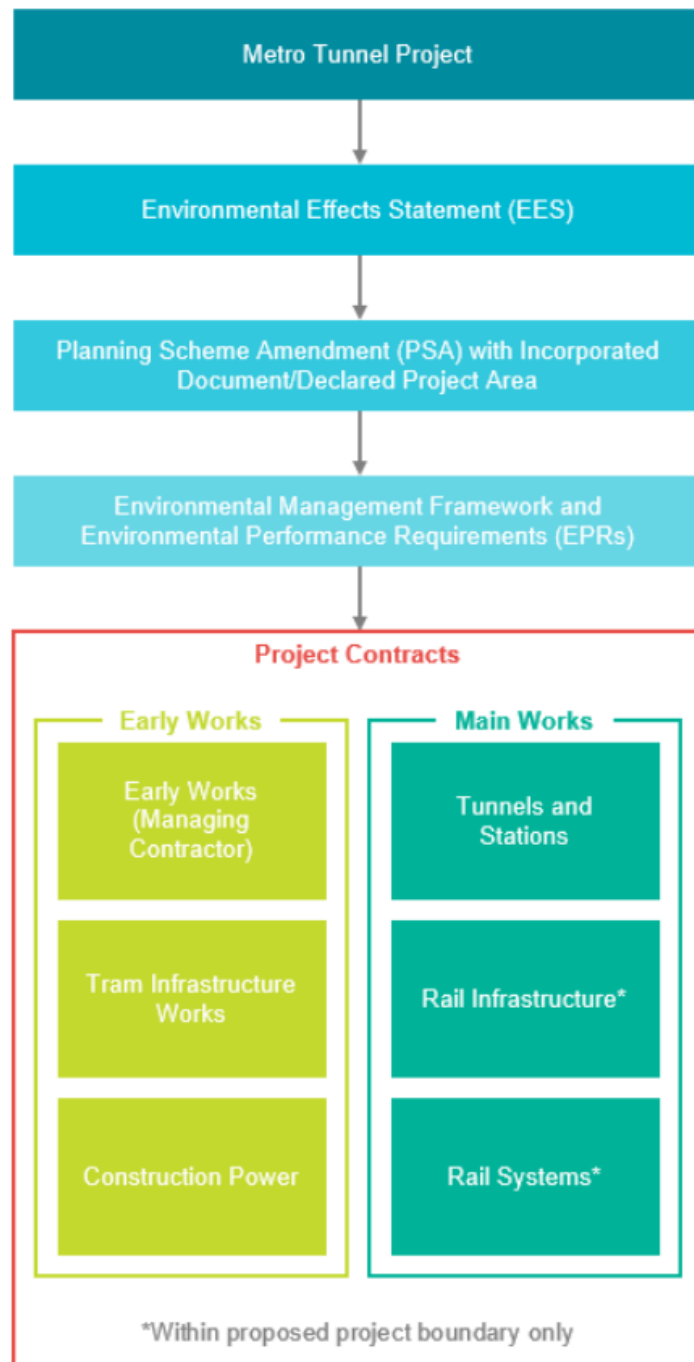


FIGURE 3-1 GOVERNANCE FRAMEWORK

3.1.1 ENVIRONMENTAL MANAGEMENT FRAMEWORK

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

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

The EMF documentation is summarised in Figure 3-2.

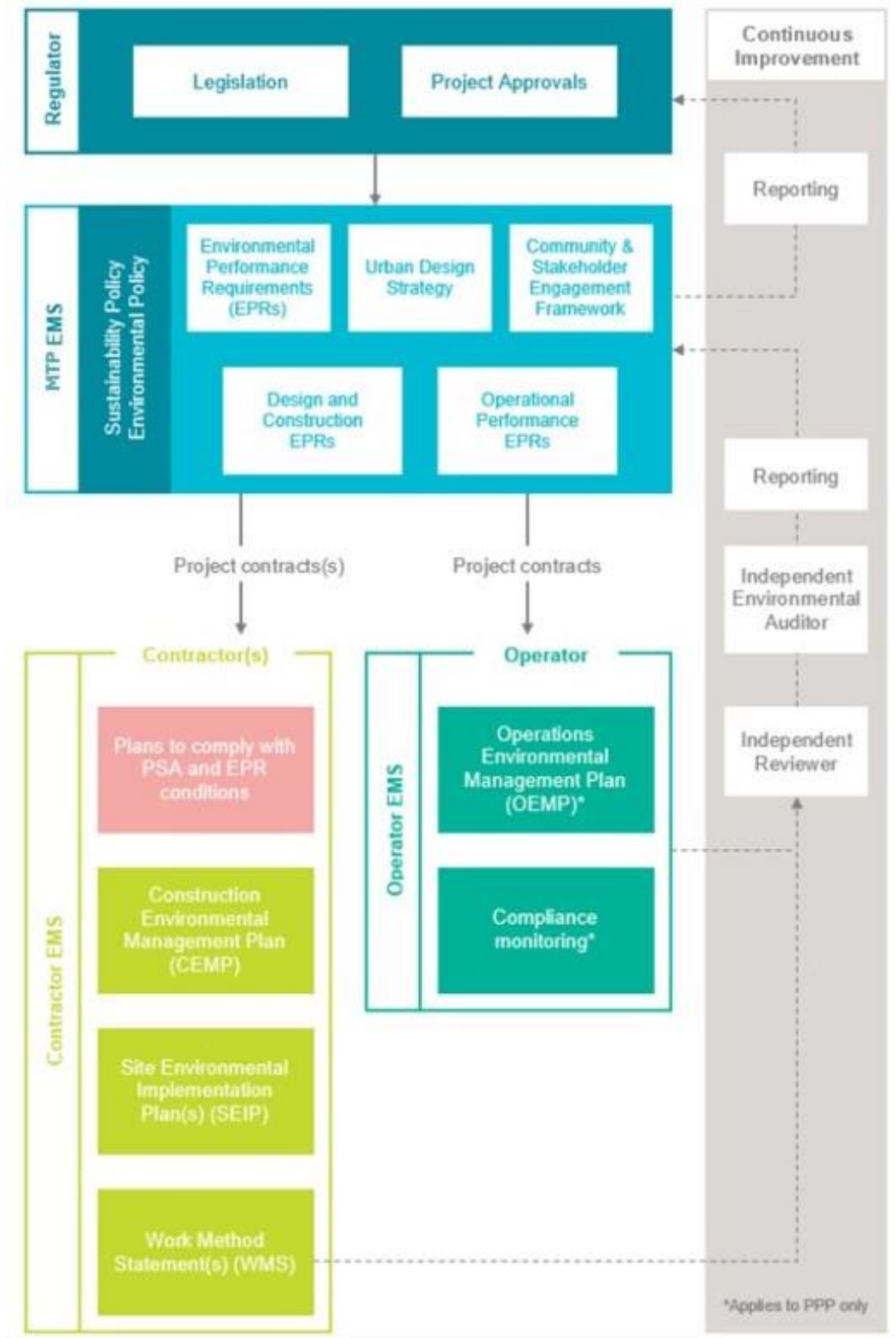


FIGURE 3-2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

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

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

3.1.2 ENVIRONMENTAL PERFORMANCE REQUIREMENTS

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

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

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

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

3.1.3 ASSOCIATED MANAGEMENT PLANS

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

3.2 Roles and Responsibilities

3.2.1 METRO TUNNEL PROJECT

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

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

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

- Review and approve contract documentation for each Project Contract in accordance with the EMF, including the CEMPs, SEIPs, Transport Management Plans, Business Disruption Plans BDPs and Construction Noise and Vibration Management Plans (CNVMP) as required by the MTP Incorporated Document.
- Review the CSEMP for each Project Contract.
- Prior to commencement of work, verify that the Delivery Partner has complied with the relevant EPRs.
- Review the Delivery Partner performance against the approved EPRs and take corrective action as necessary.
- Commission the Independent Environmental Auditor to determine Delivery Partner compliance with the EMF, EPRs and relevant Delivery Partner Management.

3.2.2 DELIVERY PARTNERS

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

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

3.2.3 INDEPENDENT ENVIRONMENTAL AUDITOR

- The EMF requires CYP to appoint an IEA to undertake environmental audits of compliance with the approved CEMP and other compliance documents.
- The IEA audits compliance with the EPRs and MTP Incorporated Document prior to implementation, as well as during project activities, to verify compliance with the EMF, EPRs, environmental management plans and approval requirements. This also includes investigations into trends in complaints, by topic or on a random basis.
- The key roles and responsibilities of the IEA during the Main Works Packages, as specified in the EMF, are:

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

4. Conduct of Audits

4.1 IEA Audit Requirements

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

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

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

4.2 IEA Audit Methodology

4.2.1 AUDIT OVERVIEW

The MTP Main Works (Tunnels and Stations) Auditing Programme by the IEA is defined in the EMF to:

- Conduct audits of the Delivery Partner works to assess compliance with the CEMP, Operational Environmental Management Plan (for Tunnels and Stations operational phase only), EMF, EPRs and plans required by the EPRs and MTP Incorporated Document.
- Prepare a six-monthly report summarising the Delivery Partner's compliance with the EMF and provide to MTP and the Delivery Partner.
- Prepare audit reports containing the results of audits.

Accordingly, the objective for these audits is to assess the conformance of the Project works with project compliance obligations.

4.2.2 AUDIT PROGRAM

Audits of the Delivery Partner's CEMP, sub-plans and SEIPs involved a review of each document to assess compliance with ISO 14001:2015, the EMF, relevant EPRs and MTP Incorporated Document.

During site inspections, compliance is assessed through observation of project activities, interviews and review of relevant environmental records. An audit program is prepared each year during a workshop attended by CYP, MTP and the IEA, Helman Environmental. Each quarterly audit scope is based on project status and the environmental aspects considered to be significant for the relevant works. Audit scopes are reviewed prior to each audit to confirm relevance relative to the stage of the project works. Audits typically evaluated:

- Conformance with CYP EMS requirements.
- Conformance with CYP CEMP requirements, management plans and any CEMP sub-plans.
- Compliance with Project EMF and EPRs.
- Compliance with the MTP Incorporated Document.

- Responses to non-conformances, incidents and complaints received.
- Effective implementation of monitoring programs.

4.2.2.1 Documentation

As part of the Tunnels and Stations Main Works program, CYP has produced environmental management documentation. The IEA has an audit program that routinely audits this documentation against the EPR requirements; these include (but are not limited to):

- Construction Environmental Management Plan and associated sub plans
- Site Environmental Implementation Plans
- Air Quality Dust and Light Management Plan
- Ecology Management Plan
- Heritage Management Plan
- Surface Water Management Plan
- Spoil Management Plan
- Land Use Management Plan
- Electromagnetic Compatibility Management Plan
- Ground Movement Plan
- Ground Movement Instrumentation & Monitoring Plan
- Groundwater Management Plan
- Monitoring Management Plan
- Environmental Monitoring Management Plan
- Noise & Vibration Management Plan
- Construction Noise & Vibration Management Plan
- Health and Safety Plan
- Emergency Response and Incident Management Plan
- EMS Manual
- Others as required.

4.2.2.2 Works

The Tunnels and Stations Main Works have been undertaken in seven construction precincts:

- Western Portal (Western Tunnel Entrance)
- Arden Station
- Parkville Station
- State Library Station
- Town Hall Station
- Anzac Station
- Eastern Portal (Eastern Tunnel Entrance).

The Main Works for the Tunnels and Stations included:

- Piling
- Excavation
- Services works
- Traffic management
- Tunnelling
- Station construction
- Station fit out.

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

4.2.2.3 Complaints

Complaints are addressed during the IEA Audits through the implementation of the CEMP audit Checklist. This includes verification that environmental-related complaints from community members or other stakeholders are managed in accordance with the processes outlined in the CEMP and Stakeholder and Communications Engagement Management Plan.

Findings against this process may result in non-conformance if complaints are not being appropriately managed. Where there are no specific IEA findings under the CEMP, complaints are being managed in accordance with the relevant plans.

4.2.3 AUDIT CLASSIFICATIONS

Helman Environmental audit finding classifications are provided in Table 4.1. CYP is required to develop action plans with a timeframe to address effective close out of all audit findings. These audit findings are required to be closed out by the Delivery Partner in a timely manner relative to the associated environmental management risk.

TABLE 4-1 HELMAN ENVIRONMENTAL AUDIT FINDING CLASSIFICATIONS

FINDING	DESCRIPTION
Conformance (C)	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the auditable element.
Non-conformance (NC)	An event that has not fulfilled a requirement specified in the EMS, CEMP, Sub Plans and Management Plans, EPRs, SEIPs, legislation and permit conditions. A situation which would, based on available objective evidence, raise significant doubt as to the effectiveness of environmental management.
Area for improvement (AFI)	A deficiency in the implementation of the EMS, CEMP or subordinate documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
Observation (O)	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 (N/A)	The auditable element falls outside the scope of the audit, e.g. work relevant to the element being audited has not yet commenced.

5. Audit Findings

This section presents a summary of the six-monthly audit reports within the reporting period (6-monthly summary reports completed in March 2025 to September 2025), including a summary of the findings raised in each period.

5.1 IEA 6-monthly summary report (March 2025)

5.1.1 FINDINGS

During the March 2025 six-monthly reporting period, there were two (2) IEA quarterly audits in November 2024 and February 2025. During the reporting period, 40 of the 125 EPRs (32%) across 10 of the 19 EPR categories were audited. Certain EPRs were not covered in the audit schedule as these were not applicable to the design and construction works ongoing during the reporting period. The EPRs vary in the detail of their requirements, and each EPR category has a different number of EPRs. The amount of EPRs audited is not directly reflective of the relative weight of environmental management requirements.

In this period, a total of one (1) audit finding was raised (as shown in Table 5.1). During the reporting period, 5 audit findings were closed, some of which were raised in the previous reporting period. One (1) audit finding remained open at the end of the reporting period.

No non-conformances were raised during the reporting period, which is summarised in Section 5.3.

TABLE 5-1 SUMMARY OF AUDIT FINDINGS (MAR 2025)

FINDING TYPE	OPEN AT START OF 6-MONTH PERIOD	RAISED DURING 6-MONTH PERIOD	CLOSED DURING 6-MONTH PERIOD	OPEN AT END OF 6-MONTH PERIOD
Non-conformance	0	0	0	0
Area for improvement	1	0	0	1
Observation	4	1	5	0
Total	5	1	5	1

5.1.2 REPORT OUTCOME

The IEA assessed CYPs performance, including environmental management documentation against the audit scope and the objectives outlined in Section 4, and criteria that were applicable to the specific audits completed during the reporting period. Against the key audit objectives, the March 2025 IEA summary report determined:

- The MTP Incorporated Document defines the requirements for the EMF for the Project. It further requires the preparation and implementation of Development Plans for each of the Stations and Portals, and an Early Works Plan. An Urban Design Strategy approved by the Minister is also required. The IEA has reviewed the required Plans separately from the audits. Each of the required Plans includes responses to the EPRs. Conformance with the 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 the IEA summary report.
- The EPRs audited were largely met. No new findings were raised against the requirements of the EPRs. There were no open findings related to EPRs.
- The CYP EMS documentation has been integrated into the CEMP documentation and is consequently audited as part of the CEMP audit.

- The CEMP provides a suitable framework for environmental management for the Project. Environmental management processes were satisfactory this reporting period.
- The requirements of the SEIPs were largely met, with the audit findings noted in this report considered minor. One (1) new finding was raised during the reporting period, four (4) findings were closed, and none (0) remain open.
- The EMF requires the development and implementation of specific Management Plans. The audits found that there was general conformance with the requirements of those specific Plans which were relevant during the reporting period. On-ground environmental management appeared to be largely robust and the requirements of the environmental management plans were being implemented. One (1) finding remains open related to chemical storage.

5.2 IEA 6-monthly summary report (September 2025)

5.2.1 FINDINGS

During the September 2025 six-monthly reporting period, there were two (2) IEA quarterly audits in May 2025 and August 2025. During the reporting period, 44 of the 125 EPRs (35%) across 14 of the 19 EPR categories were audited. Certain EPRs were not covered in the audit schedule as these were not applicable to the design and construction works ongoing during the reporting period. The EPRs vary in the detail of their requirements, and each EPR category has a different number of EPRs. The amount of EPRs audited is not directly reflective of the relative weight of environmental management requirements.

In this period, a total of two (2) audit findings were raised (as shown in Table 5.2). During the reporting period, one (1) audit finding was closed, and two (2) findings remained open at the end of the reporting period.

No non-conformances were raised during the reporting period, which is summarised in Section 5.3.

TABLE 5-2 SUMMARY OF AUDIT FINDINGS (SEP 2025)

FINDING TYPE	OPEN AT START OF 6-MONTH PERIOD	RAISED DURING 6-MONTH PERIOD	CLOSED DURING 6-MONTH PERIOD	OPEN AT END OF 6-MONTH PERIOD
Non-conformance	0	0	0	0
Area for improvement	1	0	1	0
Observation	0	2	0	2
Total	1	2	1	2

5.2.2 REPORT OUTCOME

The IEA assessed CYP's performance, including environmental management documentation against the audit scope and the objectives outlined in Section 4, and criteria that were applicable to the specific audits completed during the reporting period. Against the key audit objectives, the September 2025 IEA summary report determined:

- The MTP Incorporated Document defines the requirements for the EMF for the Project. It further requires the preparation and implementation of Development Plans for each of the Stations and Portals, and an Early Works Plan. An Urban Design Strategy approved by the Minister is also required. The IEA has reviewed the required Plans separately from the audits. Each of the required Plans includes responses to the EPRs. Conformance with the 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 the IEA summary report.

- The EPRs audited were met. No new findings were raised against the requirements of the EPRs. There were no open EPR-related findings.
- The CYP EMS documentation has been integrated into the CEMP documentation and is consequently audited as part of the CEMP audit.
- The CEMP provides a suitable framework for environmental management for the Project. Environmental management processes were satisfactory this reporting period.
- The requirements of the SEIPs were largely met, with the audit findings noted in this report considered minor. Two (2) new findings were raised during the reporting period, no (0) findings were closed, and two (2) remain open. The two (2) open findings were closed in the November 2025 audit period.
- The EMF requires the development and implementation of specific Management Plans. The audits found that there was general conformance with the requirements of those specified Plans which were relevant during the reporting period. On-ground environmental management appeared to be largely robust and the requirements of the environmental management plans were being implemented. One (1) finding was closed.

5.3 IEA Audit Report (November 2025)

5.3.1 FINDINGS

The November 2025 quarterly audit report provides the outcome of the quarterly audit of the Project's CEMP, selected EPRs, SEIPs, and environmental Plans and Sub Plans. The audit was conducted through interviews and review of relevant records and documentation on 18 – 19 November 2025; and interviews and inspection of precincts and associated construction activities on 19 November 2025.

Review of relevant records and documentation was undertaken via a combination of in person meetings and remotely via video conference, and site inspections were conducted in person. The audit period covers the works from the end of the last audit on 12 August 2025 to the end of this audit. There were no audit findings raised in the audit and the previous findings were closed, with no open audit findings at the end of November 2025

TABLE 5-3 SUMMARY OF AUDIT FINDINGS (NOV 2025)

FINDING TYPE	OPEN AT START OF NOVEMBER 2025 AUDIT	RAISED DURING NOVEMBER 2025 AUDIT	CLOSED DURING NOVEMBER 2025 AUDIT	OPEN AT END OF NOVEMBER 2025 AUDIT
Non-conformance	0	0	0	0
Area for improvement	0	0	0	0
Observation	2	0	2	0
Total	2	0	2	0

5.4 Summary of Non-conformances

During the reporting period, no non-conformances were raised by the IEA.

5.4.1 GENERAL

No general non-conformances were raised during the reporting period.

5.4.2 ENVIRONMENTAL PERFORMANCE REQUIREMENTS

No EPR specific non-conformances were raised during the reporting period.

6. Conclusions

This report summarises the IEA 6-monthly summary reports for the MTP Main Works for the Tunnels and Stations Works Package during the 2025 calendar year, which were produced in March 2025 and September 2025, and the November 2025 Audit Report. It was prepared in response to a recommendation in the VAGO Early Works Audit Report in 2019. The VAGO report assessed the environmental strategies and risk mitigation and recommended that the DTP publish summaries of key findings and recommended actions from past and future IEA reports.

The purpose of this report is to meet the above recommendation of the VAGO Early Works Audit Report and provide the wider public with information on MTP's environmental performance during the Main Works Package. The Tunnels and Stations Package is a highly complex package of works with a diverse and intricate construction program, with works occurring in a highly urbanised environment with a number of constraints. The auditing process is designed to lead to continual improvement during projects - this is key to implementing best practice ISO 14001:2015 environmental management systems.

An audit program is prepared each year during a workshop attended by CYP, MTP and the IEA, Helman Environmental. Each quarterly audit scope is based on project status and the environmental aspects considered significant for the relevant works. Audit scopes are reviewed prior to each audit to confirm relevance relative to the stage of the project works. The Delivery Partner, CYP, is required to develop action plans with a timeframe to address effective close out of all audit findings.

Table 6.1 provides a summary of audit findings raised during the audit period. These audit findings are required to be closed out by the Delivery Partner in a timely manner relative to the associated environmental management risk.

TABLE 6-1 RAISED IEA FINDING DURING REPORTING PERIOD

FINDING TYPE	NOV 24	FEB 25	MAY 25	AUG 25	NOV 2025	TOTAL RAISED FINDINGS
Non-conformance	0	0	0	0	0	0
Area for improvement	0	0	0	0	0	0
Observation	1	0	0	2	0	3

In the audit periods covered by this report, CYP closed out the audit findings in a timely manner related to the associated environmental management risk; therefore, audit findings improved CYP's systems and promoted better environmental outcomes.

At the time of writing, no non-conformance or "areas for improvement" findings were raised. The auditing programme identified that, in general, the construction of the Tunnels and Stations Package was undertaken in accordance with the requirements of EMF, relevant EPRs and MTP Incorporated Document. In the audit period, there is a general trend away from significant findings that may result in material environmental harm (i.e. non-conformance and areas for improvement), which is a result of the project's overall improvements in compliance and the commitment to the continuous improvement principle.

Major construction of the Metro Tunnel and the 5 new stations is complete, and the Project is operational, however, additional works for MTP will continue to take place in 2026, including works on the Town Hall Station precinct and other sites. This decreasing trend is also likely due to the nature of works being undertaken is lower risk than the major construction works. These works present a low risk to the environment compared to the majority of MTP works and are generally related to site finishing. On this basis ongoing IEA audit summaries may not be required in the future.

