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# WEST GATE TUNNEL PROJECT

Independent Reviewer and Environmental Auditor  
Final Report for Submission to the Minister for Planning –  
September 2025 to February 2026



# WEST GATE TUNNEL PROJECT

## Independent Reviewer & Environmental Auditor

Final Audit Report for Minister of Planning

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## EXECUTIVE SUMMARY

### Introduction

This report summarises the environmental audit findings of the Independent Reviewer and Environmental Auditor (IREA) for the West Gate Tunnel Project (the Project) in Melbourne, Victoria. It covers the six-monthly audit of the Environmental Management Strategy (the Strategy), quarterly Construction Environmental Management Plan (CEMP) audits, and monthly audits of the Worksite Environmental Management Plans (WEMP) which occurred during the construction and operation period from September 2025 to February 2026.

This is the sixteenth IREA Minister's Report, which is required to be issued every six months to the Victorian Minister for Planning and made available to the public on the Project website.

Construction on the Project commenced in March 2018 and Project Opening occurred on 14 December 2025. The IREA auditing role continues during the Defects and Liability Phase (DLP) and operations.<sup>1</sup>

### Overview of Findings

Project Co / the D&C Subcontractor is generally compliant with the Environmental Performance Requirements (EPR).

The IREA will continue to focus on how Project Co and the D&C Subcontractor demonstrate compliance with Project environmental requirements.

At the time of writing this report, there are two (2) open findings related to CEMP audit findings and one open finding related to WEMP audit findings.

A summary of the findings raised during this reporting period is below.

### Environmental Management Strategy

Audits of the Strategy are conducted six-monthly, with no audits conducted during this reporting period.<sup>2</sup>

### Environmental Performance Requirements

During the last six-month reporting period the IREA formally audited 29 EPRs, 11 EPRs audited in November 2025 and 18 EPRs audited in February 2026. The majority of EPRs audited during the reporting period were deemed compliant. The findings raised consisted of:

- Zero (0) non-conformances were raised during this audit period.
- One (1) opportunity for improvement was raised during this audit period.
- Three (3) observations were raised during this audit period.

Zero (0) audit findings were closed from previous reporting periods. In total there is one (1) finding remaining open at the end of this reporting period, noting that observations do not remain open beyond the initial audit in which they are raised.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status.

### Construction Environmental Management Plan

The last six-month reporting period focused on auditing a range of CEMP elements and subplans.

The CEMP audit findings for the November 2025 quarterly audit are summarised below:

- Zero (0) non-conformances were raised during this audit.

---

<sup>1</sup> The first Operational Environmental Management Plan audit was conducted in March 2026 and will be reported in the next Minister's Report.

<sup>2</sup> The March 2026 EMS audit will be reported in the next Minister's Report.

- One (1) opportunity for improvement was raised during this audit.
- One (1) observation was raised during this audit.

The CEMP audit findings for the February 2026 quarterly audit are summarised below:

- Zero (0) non-conformances were raised during this audit.
- One (1) opportunity for improvement was raised during this audit.
- One (1) observation was raised during this audit.

Zero (0) opportunities for improvement were closed from previous reporting periods. In total there are two (2) findings remaining open at the end of this reporting period.

Details of the CEMP findings are listed in Section 3.3.

### **Worksite Environment Management Plans**

During the reporting period six WEMP audits were conducted. A total of fifteen (15) findings were raised in this reporting period. These consisted of:

- Zero (0) non-conformances.
- Four (4) opportunities for improvement.
- Eleven (11) observations.

The D&C Subcontractor has continued maintaining their systems and processes, and on-site environmental management. The number of new audit findings raised during this period (15) was more than the number raised during the previous period (7). Three (3) opportunities for improvement were closed during this reporting period. In total there is one (1) WEMP audit finding remaining open, noting that observations do not remain open beyond the initial audit in which they are raised.

The WEMP findings are further detailed in Section 3.4.

### **Conclusions**

The findings arising from the reporting period by the IREA have not identified any immediate significant or material risks to the environment.

Implementation of the EPRs was found to be compliant, with one (1) opportunity for improvement and three (3) observations during the reporting period.

Three (3) audit findings from previous reporting periods were closed, including three (3) WEMP findings (three opportunities for improvement). In total there are four (4) findings remaining open at the end of this reporting period.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status.

Operational audits of OpCo commence in March 2026 and will be reported in the next Minsters Report.

## GLOSSARY OF TERMS & ABBREVIATIONS

AQMP	Air Quality Management Plan
ATCR	Alternative Traffic Control Room
BIP	Business Improvement Plan
BOM	Bureau of Meteorology
CD	Certified Design
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CPBJH	Design and Construction Subcontractor (D&C Subcontractor)
CSM	Conceptual Site Model
DLP	Defects and Liability Phase
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMP	Energy Management Plan
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPR	Environmental Performance Requirements
FCC	Freeway Control Centre
FFMP	Flora and Fauna Management Plan
FRP	Formwork, Reo and Pour
GHG	Greenhouse Gas
GMMP	Ground Movement Management Plan
GRC	Glassfibre Reinforced Concrete
GWMP	Groundwater Management Plan
HMP	Heritage Management Plan
HPAMP	Historic Places and Archaeological Management Plan
HSMP	Hazardous Substances Management Plan
IREA	Independent Reviewer and Environmental Auditor
ISCA	Infrastructure Sustainability Council Australia
ITS	Intelligent Transport Systems
JASANZ	Joint Accreditation System of Australia and New Zealand
LMP	Lighting Management Plan
ME&I	Mechanical, Electrical and Installation
NML	Noise Management Levels
NYMS	North Yarra Main Sewer
OEMP	Operational Environmental Management Plan
OpCo	Transurban Vic Op Co Pty Limited
OSP	Outbound Southern Portal

West Gate Tunnel Project

ProjectCo	Transurban WGT Co Pty. Limited
PPP	Public Private Partnership
PSA	Planning Scheme Amendment
PSR	Project Scope & Requirements (Project Agreement or Contract)
SAQPs	Sampling Analysis and Quality Plans
SEPP	State Environment Protection Policy
SSMP	Soil and Spoil Management Plan
SUP	Shared User Path
WEMP	Worksite Environment Management Plan
WGTP	West Gate Tunnel Project
WGTP VIDA Roads	West Gate Tunnel Project Victorian Infrastructure Delivery Authority Roads (the State)
WMP	Water Management Plan
WstMP	Waste Management Plan
XP	Cross passage

# 1 INTRODUCTION

## 1.1 Purpose of this Report

This report summarises the Independent Reviewer and Environmental Auditor (IREA) audit findings from the sixteenth six-month period of construction of the West Gate Tunnel Project (the Project) in Melbourne, Victoria.

The IREA has been jointly appointed by West Gate Tunnel Project, Victorian Infrastructure Delivery Authority Roads (WGTP VIDA Roads) and Transurban WGT Co Pty (Project Co) to provide independent oversight of design engineering, construction, program and environmental performance of the Project. The IREA undertakes audits, review of documentation and site surveillance of Project activities to assess whether conformance with Project requirements is being achieved. This includes the Environmental Performance Requirements (EPR) issued by the Minister for Planning in December 2017.

During the reporting period the IREA audited Project Co (responsible for delivering the Project and future operator of the road) to determine conformance with the Environmental Management Strategy (the Strategy). Similarly, the IREA has audited the CPB John Holland Joint Venture (D&C Subcontractor) to determine conformance with the Construction Environmental Management Plan (CEMP), EPRs, and Worksite Environment Management Plans (WEMP).

Prior to starting construction, the IREA reviewed the Strategy and approved the CEMP (and associated subplans). The WEMPs are approved by Project Co. The audits considered in this report are identified under the Project's EPRs (specifically EMP3) required by the Project's Planning Scheme Amendment (PSA) (GC93) and the Project Agreement between the State of Victoria (represented by WGTP VIDA Roads) and Project Co.

The IREA is required to provide a six monthly "audit report" for submission to the Minister for Planning which must be made available to the public (this report).

## 1.2 Project Background

### 1.2.1 West Gate Tunnel Project

On 11 December 2017, the Victorian State Government (the State), as part of a Public Private Partnership (PPP), entered into contracts with Project Co for the construction and operation of the Project.

Project Co is responsible for the design, partial financing, construction, tolling, operation, and maintenance of the Project. Project Co has ultimate responsibility to the State for delivering the Project to the requirements in the contract and for ensuring the D&C Subcontractor fulfils their obligations including the EPRs.

The D&C Subcontractor has been contracted to complete the detailed design and construction of the Project.

The WGTP VIDA Roads is an administrative office established to manage the delivery of the Project in accordance with the contracts on behalf of the State Government. The Project has three components:

1. West Gate Freeway – upgrade and widening works between the M80 Ring Road interchange and Princes Freeway to the southern portals of the tunnels, including connections to Grieve Parade, Millers Road, Williamstown Road, Hyde Street, and the West Gate Bridge.
2. Twin tunnels – two tunnels, one inbound and one outbound, under Yarraville catering for three lanes between the southern and northern portals and connecting to the new bridge over the Maribyrnong River. The outbound tunnel will be approximately 4.0 kilometres long and the inbound tunnel will be approximately 2.8 kilometres long. A tunnel ventilation structure will be located at each exit portal.
3. Port, CityLink, and city connections – connects from the northern tunnel portal to the central city and includes the Maribyrnong River crossing, connections to the Port of Melbourne, elevated roads along Footscray Road, and connections to CityLink and the northwest of the central city. Connections are also provided to both sides of the Port of Melbourne via MacKenzie Road and Appleton Dock Road. A widened Wurundjeri Way is connected to Dynon Road.

Early (preparatory) works started in December 2017 in preparation for construction. This included for instance, low environmental impact works such as completion of environmental surveys and investigations required prior to construction start. The Project started full construction in March 2018 on approval of the CEMP. Details on the construction progress over the audit period are described in Section 2.3.1

There are several ways the public can engage with the Project, including:

- Visiting the Project website at <https://westgatetunnelproject.vic.gov.au/>
- Contacting the Project call centre on 1800 105 105
- Visiting the Operator website at <https://www.linkt.com.au>
- Contacting the Operator call centre on 13 33 31

## 1.2.2 Planning and Environment Approvals

The Project was declared 'public works' under the *Environment Effects Act 1978* in December 2015, requiring the preparation of an Environment Effects Statement (EES) to inform the Minister for Planning's assessment of the environmental effects of the Project. The EES was publicly exhibited in late May 2017 and public hearings undertaken between mid-August and late September 2017. The Minister for Planning publicly released his Assessment on 27 November 2017 to complete the EES process – concluding that the Project would deliver substantial transport and related benefits.

Three key (primary) approvals have been granted for the Project under Victorian legislation, including:

- Planning Scheme Amendment (PSA) and Incorporated Document issued by the Victorian Minister for Planning requires the project to be constructed and operated according to the Minister's requirements. The Minister approved the project under PSA GC65 on 7 December 2017. This PSA was revoked by Parliament on 7 March 2018 and remade with PSA GC93 on 8 March 2018. The PSA has been incorporated into six separate local Planning Schemes: Brimbank, Hobsons Bay, Maribyrnong, (City of) Melbourne, Port of Melbourne and Wyndham.
- Works Approval issued by the Victorian Environment Protection Authority (EPA) for design and construction of the tunnel ventilation structures.
- Cultural Heritage Management Plan (CHMP) 14562 issued by Aboriginal Victoria for works potentially affecting known and potential areas of Aboriginal Cultural Heritage Significance. CHMP 14562 amended on 4 April 2018 and 28 February 2020.

These approvals include a range of obligations and conditions, including the PSA which requires the Project to be carried out in accordance with the approved "*West Gate Tunnel Project Environmental Performance Requirements, December 2017*". The EPRs define the project-wide environmental outcomes that must be achieved during design, construction and operation of the Project (refer Appendix A for a summary list of these EPRs and the Project website for a full version -

<http://westgatetunnelproject.vic.gov.au/about/keytopics/planning-approvals>).

The Environmental Management EPRs set out the following requirements:

- EPR EMP1 requires the preparation of an Environmental Management Strategy (the Strategy) to provide an overarching framework to address environmental requirements including relevant environmental laws, key approvals, approval conditions and the EPRs.
- EPR EMP2 requires the preparation and implementation of a CEMP, Worksite Environmental Management Plan (WEMP), Operational Environmental Management Plan (OEMP) and other plans as required by the EPRs in accordance with the Strategy.
- EPR EMP3 requires the appointment of an Independent Reviewer and Environmental Auditor (the IREA) to ensure compliance with the Strategy and EPRs and conduct compliance audits of the approved Strategy, CEMP and WEMPs. The WGTP VIDA Roads must forward the audit reports to the Minister for Planning and other approval agencies as appropriate.

The EPRs set standards for the Project and are put in place to mitigate any adverse local effects of the Project on people and the environment. The EPRs have been incorporated into the Project Agreement

between the State and Project Co and are included in the subcontract between Project Co and the D&C Subcontractor.

On 1 July 2021, the new *Environment Protection Act 2017* came into force. The “Compliance Code for Victoria’s Big Build Projects” (EPA Publication 1998, June 2021) applies to the Project and provides practical guidance on how to comply with specific duties and obligations under the *Environment Protection Act 2017* and *Environment Protection Regulations 2021*.

The relationship between the various Project parties and key planning and environment documents, including the Strategy, are summarised in Figure 1 below. This diagram shows the role of the Minister for Planning and other regulatory authorities in issuing approvals for the Project while continuing their role as regulator (blue boxes). These requirements, which include regulatory approvals and EPRs, are then incorporated into a series of Project Agreements (contracts) between WGTP VIDA Roads (representing the State of Victoria), Project Co, and the D&C Subcontractor. Project Co delegate the direct responsibility for delivering these environmental requirements to the D&C Subcontractor via the Strategy.

The Strategy lists the Project environmental requirements and minimum requirements for both Project Co and the D&C Subcontractor. In the case of the D&C Subcontractor, this includes the requirements to develop environmental documentation such as a CEMP which outlines how environmental requirements will be met during design and construction, and WEMPs, which are used on the construction site as a practical guide to manage environmental issues. The D&C Subcontractor is also required to maintain an Environmental Management System that complies with the international standard ISO14001 Environmental Management Systems. This requires the D&C Subcontractor to develop and maintain various management systems, procedures and processes that facilitate continual improvements in environmental management.

The responsibility of WGTP VIDA Roads, Project Co and the D&C Subcontractor for delivery of the environmental management framework is summarised in Figure 2. The figure also shows how environmental requirements are incorporated into design and construction documentation. Project Co is responsible for the preparation and implementation of the Strategy in accordance with EPR EMP1. The obligation for the preparation and implementation of the CEMP (including subplans), WEMP and any other project plans required to achieve the EPRs is the responsibility of the D&C Subcontractor. Design and construction documentation is prepared by the D&C Subcontractor in accordance with relevant environmental requirements and EPRs.

Construction on the Project commenced in March 2018 following the approval of the Strategy by the Minister for Planning and the CEMP (and subplans) by the IREA and WGTP VIDA Roads. The WGTP commenced operations on 10 December 2025. The IREA auditing role continues during the Defects and Liability Phase (DLP) and Operations.

Further information on the Strategy, CEMP, WEMP, OEMP and the audit and review processes is provided in the following sections.



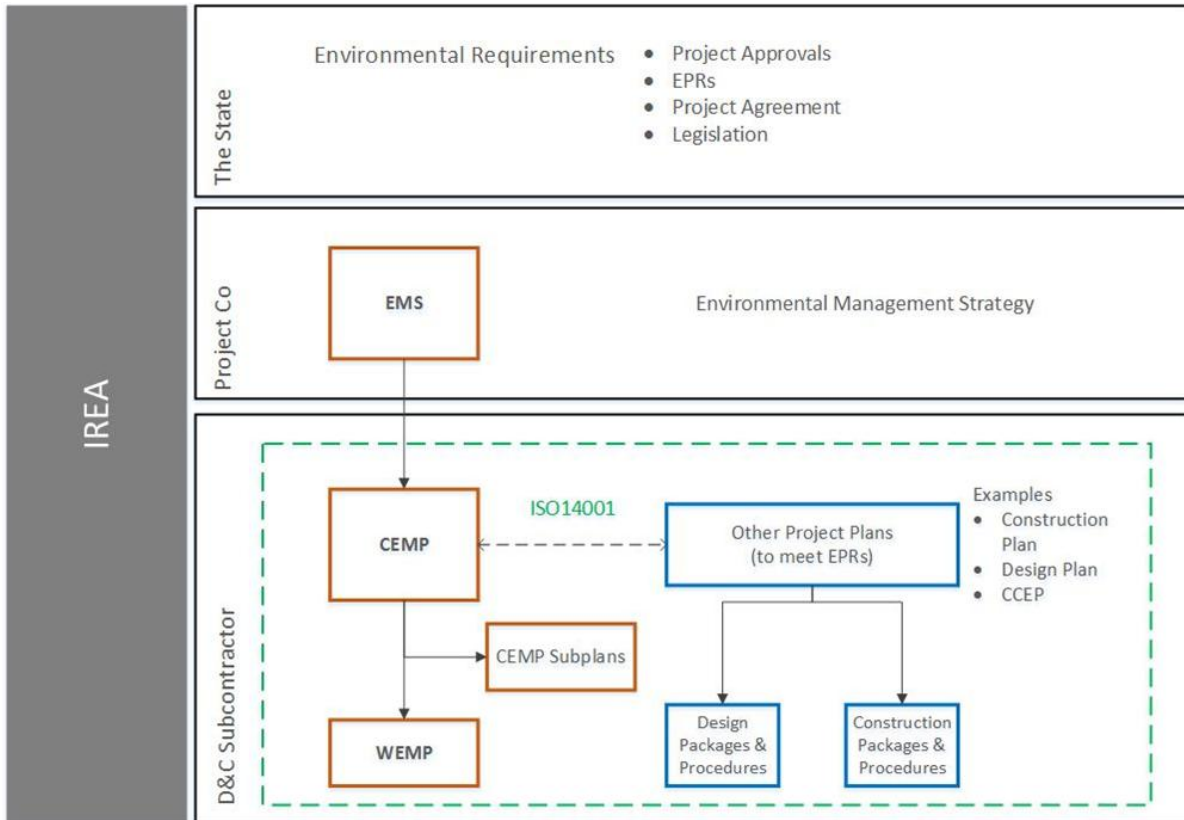


Figure 2 – Relationship between environmental management framework and Project design and construction documentation.

### 1.2.3 Environmental Management Strategy

The Strategy provides an overarching framework to address all environmental requirements and manage environmental outcomes for the Project. Project Co is responsible for ensuring compliance with the Strategy which sets out the framework for delivering and complying with the EPRs, CEMP and other environmental requirements.

The Strategy was developed in early 2018, finalised on 31 January 2018, and approved by the Minister for Planning on 20 February 2018 (under PSA GC65). It was prepared in consultation with councils and other key stakeholders and reviewed by the IREA. PSA GC65 was revoked by the Parliament of Victoria on 7 March 2018, a new PSA (PSA GC93) was approved by the Minister for Planning, including re-approval of the Strategy by the Minister for Planning on 8 March 2018 in exactly the same form.

The Strategy outlines the Project’s overall Environmental Management System, including responsibilities shared by the WGTP VIDA Roads, Project Co, and the D&C Subcontractor. The Strategy is consistent with the Australian Standard for Environmental Management Systems (AS/NZ ISO 14001), which includes, but is not limited to project legal requirements, environmental management documents, roles and responsibilities, communication requirements, reporting, auditing, and processes for evaluating compliance. It is designed to provide an overarching framework to address the EPRs, which are largely delegated to the D&C Subcontractor to deliver (via the CEMP and Design Management Plans).

### 1.2.4 Construction Environmental Management Plan

The D&C Subcontractor’s CEMP and subplans were developed in March 2018 and approved by the IREA and WGTP VIDA Roads for implementation. The CEMP outlines how the D&C Subcontractor will achieve the environmental requirements for the construction phase of the Project. This includes requirements outlined under the legislation (including permits and approvals), the Project EPRs, and requirements set out under the Project Agreement. The CEMP includes control measures for implementation during construction in order to manage, minimise or avoid environmental impacts in carrying out construction activities. The following

subplans have also been developed to manage environmental risk associated with D&C Subcontractor activities and to address the requirements of EPRs:

Table 1 – Status of CEMP and subplans<sup>3</sup>

Plan	Update status
Construction Environmental Management Plan Rev 26 30 May 2025	Rev 26 – For Use
Water Management Plan Rev 20 30 May 2025	Rev 20– For Use
Flora and Fauna Management Plan Rev 25 30 May 2025	Rev 25 – For Use
Construction Noise and Vibration Management Plan Rev 19 30 May 2025	Rev 19 – For Use
Groundwater Management Plan Rev 23 28 October 2025	Rev 23 – For Use
Heritage Management Plan Rev 17 30 May 2025	Rev 17 - For Use
Waste Management Plan Rev 21 30 May 2025	Rev 21 – For Use
Energy Management Plan Rev 22 30 May 2025	Rev 22 – For Use
Hazardous Substances Management Plan Rev 19 30 May 2025	Rev 19 - For Use
Lighting Management Plan Rev 21 30 May 2025	Rev 21 - For Use
Soil and Spoil Management Plan Rev 21 02 Dec 2024	Rev 21 – For Use (Consolidated comments on Rev 23 provided in October 2025)
Air Quality Management Plan Rev 21 30 May 2025	Rev 21 – For Use
Ground Movement Management Plan Rev 17 30 May 2025	Rev 17– For Use
Tree Management Plan Rev 5* 30 May 2025	Rev 5 - For Use

\* Tree Management Plan was previously an appendix of the Flora and Fauna Management Plan (Revision 8)

<sup>3</sup> Subplan revisions listed in left column are the latest approved revisions by the IREA and the State.

These sub plans do not address the entire scope of all EPRs for the Project. The CEMP makes reference to a suite of other management plans which are required to demonstrate how these and other EPRs will be complied with e.g. Interface Management Plan, Business Involvement Plan, Design Management Plan, Construction Management Plan, Communications and Community Engagement Plan (CCEP), Construction Communications and Community Engagement Plan (CCCEP). The CEMP (and auditing process) is the main framework document used to audit conformance with the Project EPRs (noting it delegates these requirements to other parts of the D&C Subcontractor Management Systems).

### **1.2.5 Worksite Environmental Management Plans**

The D&C Subcontractor's WEMPs are prepared in order to manage discrete construction stages or work packages (by type) that may have an adverse impact on the environment. The WEMPs are subsidiary to the CEMP and are implemented at specific worksites to minimise potential impacts of construction activities on the environment and community. Each WEMP will include a map showing the location and scope of works to be managed and include environmental management measures (controls) required to be implemented. The WEMPs are for use by site personnel, consultants, and subcontractors, and a copy of the relevant WEMP is to be displayed at each site compound. Some EPRs require engagement with regulators (including Councils) where it is considered appropriate e.g. when Council land is affected.

### **1.2.6 Operational Environmental Management Plan**

The OEMP and subplans were developed during 2025 and approved by the IREA and WGTP VIDA Roads in November 2025 prior to operations. The OEMP outlines how OpCo will achieve the environmental requirements for the operations phase of the Project. This includes requirements outlined under the legislation (including permits and approvals), the relevant Project EPRs, and requirements set out under the Project Agreement. The OEMP includes control measures for implementation during operations in order to manage, minimise or avoid environmental impacts in carrying out operational activities. The following subplans have also been developed to manage environmental risk associated with OpCo activities and to address the requirements of EPRs:

- Air Quality Management Plan, Rev 2.2
- Climate and Carbon Management Plan, Rev 2.1
- Flora and Fauna Management Plan, Rev 2.1
- Heritage Management Plan, Rev 2.1
- Operational Environmental Management Plan, Rev 2.1
- Operational Noise and Vibration Management Plan, Rev. 2.2
- Soil Management Plan, Rev 2.1
- Waste Management Plan, Rev 2.1
- Water Management Plan, Rev 2.2

## **1.3 Role of the IREA**

The IREA was jointly appointed by WGTP VIDA Roads and Project Co on 30 May 2017 to provide independent oversight of design engineering, construction, and environmental performance of the Project. The IREA undertakes audits and surveillance of Project activities to assess whether compliance with the Project Documents is being achieved. This includes EPR EMP3 which requires the IREA to complete environmental audits of conformance with the approved Strategy (six-monthly), CEMP (quarterly), OEMP (quarterly) and WEMPs (monthly).

The IREA started work on the Project in late 2017, through review of design and construction packages associated with "early works" (limited to low impact investigations and site set up), site surveillance of early works, and reviews of draft environmental management documentation.

Following Financial Close and the issuing of key approvals, the IREA and WGTP VIDA Roads approved the CEMP (including subplans) prior to construction starting in March 2018. The IREA and WGTP VIDA Roads are also responsible for reviewing subsequent revisions of the CEMP and subplans.

Following Project Opening on 14 December 2025, the IREA's auditing role continues during Defects and Liability Phase (DLP) and operations, as described in the following sections.

### **1.3.1 Regular Site Inspections / Surveillance**

The IREA undertakes regular inspections of the construction site. Now that the Project has moved into the DLP the scale of works, and associated environmental risk, are much reduced. Surveillance activities are recorded and utilised in monthly reporting. The surveillance activities assist the IREA in identifying key issues and risks which is used to inform future surveillance and auditing effort. These inspections are designated by "CS" in Appendix A, which summarises the activities that the IREA has undertaken over the last six months in relation to checking compliance with the EPRs. This shows that while not every EPR is formally "audited" by the IREA every day, it is subject to regular surveillance.

### **1.3.2 Design and Construction Documentation Review**

The IREA reviews all design and construction packages (designated "DR" and "CR" in Appendix A). This includes, but is not limited to, reviews of documents such as design drawings, technical information packages, design packages (outlining the basis of design), construction packages, and construction procedures. These documents are reviewed by one or more representatives of the IREA considered a specialist in their field e.g. hydrogeologist, bridge engineer, ecologist. The IREA reviews these documents against all Project environmental requirements. These reviews are sent to all Project parties for consideration and action (by the D&C Subcontractor). The IREA is required to certify design packages which means that these are not signed off until the environmental requirements are addressed. Construction packages are reviewed by the IREA and checked for compliance on site during site surveillance (refer Section 1.3.1). The outcomes of these reviews do not represent a formal audit but can provide (in part or in full) inputs into the quarterly CEMP audit which is the formal mechanism for auditing and reporting on EPR conformance.

### **1.3.3 Management Plan Review**

The IREA is responsible for reviewing and/or approving management plans and documentation (designated "MP" in Appendix A). In approving the CEMP and subplans required prior to construction start (in March 2018), the IREA has checked compliance with the EPR linked to these CEMP subplans. Though not a formal audit, these reviews are documented in the EPR compliance table in Appendix A as they go some way to demonstrating conformance. The IREA has also reviewed a number of other plans that do not necessarily need to be included in the CEMP but remain a requirement of the EPR, such as the CCEP. The review process for these plans is similar to the process used for design and construction packages, whereby the IREA's comments are documented, and the D&C Subcontractor is obliged to address these in subsequent revisions of the plan before it is issued for use.

The CEMP and subplans have been approved by the project parties (refer Table 1).

The Operational Environmental Management Plan (OEMP) and subplans were reviewed and approved by the project parties prior to commencement of operations.

EPR EMP3 requires formal auditing of the Strategy, the CEMP, the OEMP and WEMPs (refer Section 2 for further detail on the conduct and scope of auditing). Audits of the CEMP and EPRs are undertaken every quarter (identified under the "Audit" columns in Appendix A). The IREA's indicative 12-month EPR audit schedule is included in Appendix A. Through this program all applicable EPRs are audited at least once over a twelve-month period via the quarterly CEMP audits.

### **1.3.4 Minister's Report**

The IREA in its role as independent auditor is responsible for preparing a summary audit report which, WGTP VIDA Roads must forward to the Minister for Planning during construction and other approval

authorities as appropriate. This audit report draws from audits undertaken over a six-month period, in this case the (sixteenth) six months of construction and operation between September 2025 – February 2026. The formal audits described in this Minister’s Report have been undertaken by the IREA Lead Environment Auditor Camilla Freestone and Assistant Environment Auditors, Roya Mehrpoor, Raisa Gamboa and Clemence Neylan. The team were supported by the specialists listed in Appendix B.

## 1.4 Report Structure

This report is divided into the following sections:

- Section 2: Conduct of Audits – details the scope of the IREA’s audit activities undertaken prior to, during and after the audit.
- Section 3: Audit findings – provides the IREA’s findings from audits of the Strategy, CEMP and WEMPs.
- Section 4: Audit Conclusion –on the D&C Subcontractor’s conformance with the requirements of the Strategy, CEMP and WEMPs.
- Appendices
  - Appendix A – EPR Auditing Status
  - Appendix B – IREA Specialist Team
  - Appendix C – Limitations.

## 2 CONDUCT OF AUDITS

### 2.1 Audit Objectives

The objective of the audits summarised in this report is to assess conformance with the current Strategy, the CEMP, and the WEMPs based on the requirement of EPR EMP3. This includes conformance with the primary approvals (refer Section 1.2.2 above). The objective of these audits is to sample compliance with requirements over the period of September 2025 to February 2026 (inclusive).

### 2.2 IREA Auditing Process

Figure 3 below details the key steps of the IREA environmental auditing process.

### 2.3 Audit Scope

The IREA determines the scope of these audits, which changes based on which Project issues, activities and environmental risks are considered to be significant at the time of audit. Considerations may include:

- Implementation of the CEMP and associated management system and tools.
- Analyses of environmental monitoring results, focusing on groundwater, noise, vibration, surface water, and air quality.
- Environmental risks relating to current construction activities.
- Concerns of the community.
- Compliance status of EPRs.

The IREA reviews a sample of environmental requirements (and evidence of compliance) over the auditing period. It is not feasible or necessary to fully audit all requirements in a six-month period (there are thousands of requirements e.g. legislation, EPRs, contract, CEMP, subplans). For example, the IREA excluded requirements, such as operational EPRs, that were not within the scope of work during the reporting period.

It should be noted that while all environmental requirements are not formally audited over a six-month period, the IREA is required to “check” compliance with environmental requirements through activities such as formal review of documentation and inspection of the construction site (refer Section 1.3). This means that a much larger set of requirements relevant to the Project period will be checked by the IREA for compliance during this period.

In this six-month reporting period, 29 of the 117 EPRs were audited by the IREA. 53 EPRs were audited during the previous reporting period (March 2025 – August 2025), bringing the total EPRs audited for this 12-month period to 82, including 8 EPRs that were audited twice and 1 EPR that was audited three times (refer Appendix A). The remaining EPRs not audited include:

- Twenty (20) EPRs that have been deemed inactive at this phase of the Project.
- Fourteen (14) EPRs that have been deemed closed.
- Seven (7) EPRs that are to be audited in the Construction and DLP Phase and reported in the seventeenth Minister Report period.
- Four (4) EPRs that are not applicable to the Construction and DLP Phase, and as such, will be audited during the O&M Phase.

The environmental requirements audited and checked by the IREA during this 12-month period are summarised below and shown in Appendix A.

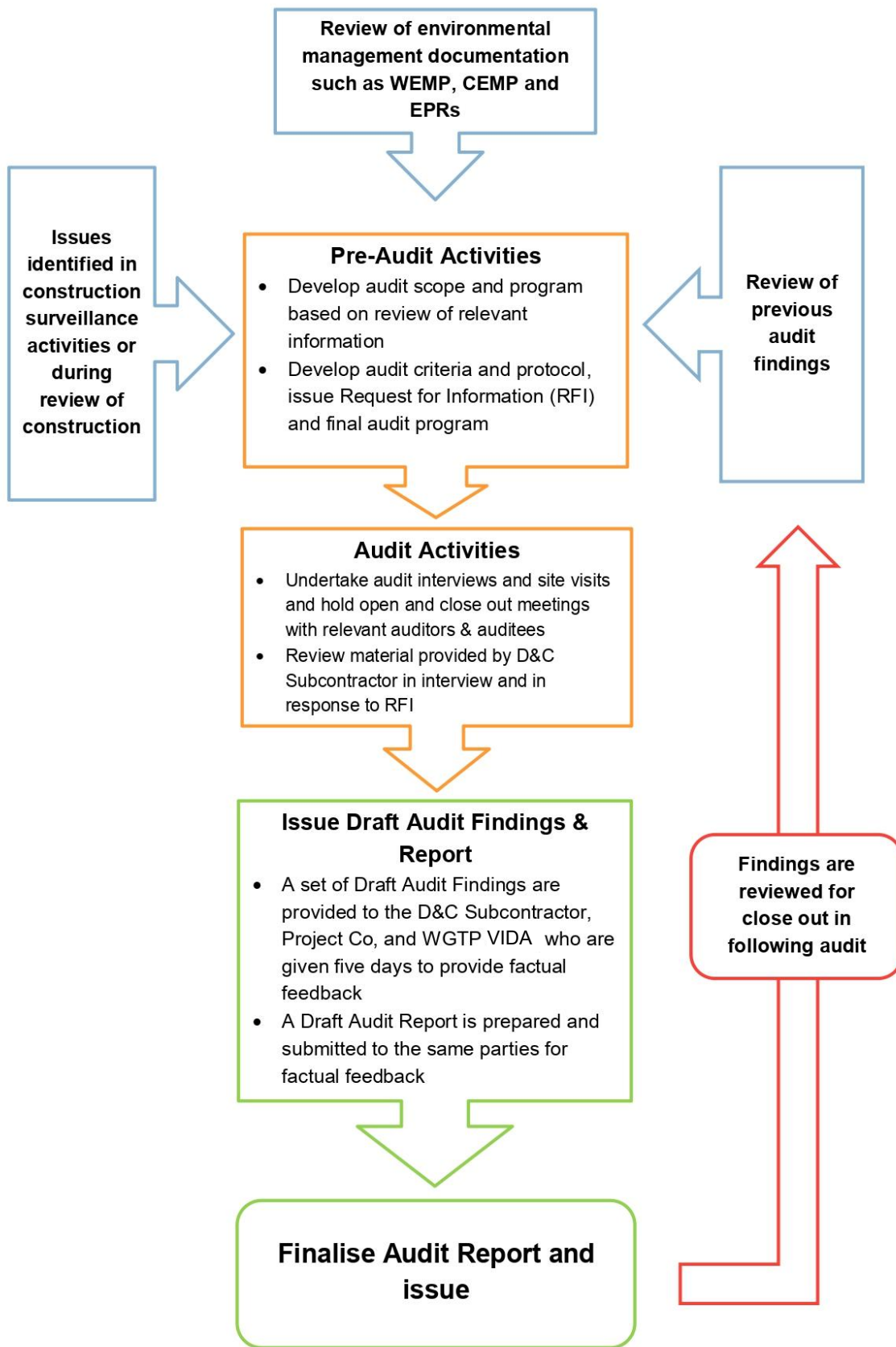


Figure 3 – Overview of environmental audit process during construction and DLP

A summary of the scope of the audits conducted by the IREA is provided in Table 2 below.

Table 2 – Summary of Audits Conducted During Reporting Period – September 2025 to February 2026.

Audit Type	Date	Scope
CEMP Audit	November 2025 & February 2026	<ul style="list-style-type: none"> <li>• Elements 1, 3, 4, 5, 9 and 10 of the CEMP. Revision 26 (dated 30 May 2025) was audited in the November 2025 and February 2026 audits.</li> <li>• Relevant documentation including D&amp;C Subcontractor management plans and subplans such as Business Involvement Plan (Section 3), Construction Noise and Vibration Management Plan (Section 5), Heritage Management Plan (Section 4 and 5), Lighting Management Plan (Section 4 and 5), Soil and Spoil Management Plan (Section 4 and 5), and Waste Management Plan (Section 4). A full overview of CEMP documentation audited during this reporting period is provided in Section 3.3.</li> <li>• A selection of EPRs relevant to the current stage of design and construction (as defined in Appendix A). Overview of EPR documentation audited during this reporting period is provided in Section 3.2.</li> </ul>
WEMP Audit	September 2025 Tunnels Zone	<ul style="list-style-type: none"> <li>• Audit of Outbound - Southern Tunnel Portals (including cut and cover)</li> </ul>
	October 2025 West Zone	<ul style="list-style-type: none"> <li>• Audit of Hyde Street Ramps</li> </ul>
	November 2025 Tunnels Zone	<ul style="list-style-type: none"> <li>• Audit of Northern Portal Civil and Structure Works</li> </ul>
	December 2025 Tunnels Zone	<ul style="list-style-type: none"> <li>• Audit of Outbound - Southern Tunnel Portals (including cut and cover)</li> </ul>
	January 2026 Tunnels Zone	<ul style="list-style-type: none"> <li>• Audit of Outbound - Southern Tunnel Portals (including cut and cover)</li> </ul>
	February 2026 Tunnels Zone	<ul style="list-style-type: none"> <li>• Audit of Pivot Site</li> </ul>

The IREA’s view on conformance was informed by interviews with staff from the D&C Subcontractor, and review of relevant systems, tools and documentation developed and implemented. The IREA has reported on findings raised and closed between 1 September 2025 and 28 February 2026.

### 2.3.1 Design and Construction Activities – September 2025 to February 2026

West Gate Tunnel Opening was achieved on 14 December 2025 and project activities are now considered in terms of Close Out and Defects and Liability Phase (DLP). As such, below is a summary of key design and construction activities from September 2025 to December 2025:

**West –**

- Works progressed across multiple locations within the zone during this reporting period. Signage installation was completed throughout the area. At New Street, construction of the Shared User Path (SUP) and playground commenced, initiating community infrastructure works at the site. Significant strengthening works were completed on the SUP pedestrian bridge over Stoney Creek, with landscaping works also finalised in the surrounding area. In addition, offset tree planting was undertaken at Forrest Street Reserve and in areas near Fogarty Avenue.

### **Tunnels, Buildings, and Mechanical, Electrical & Interfaces –**

- During the reporting period, tunnel works entered their final phase, with the majority of physical construction activities completed by the Project Opening date of 14 December 2025. Following this milestone, efforts were redirected towards defect rectification and close-out activities, with a strong emphasis on resolving outstanding issues in a timely manner.

By the end of February 2026, a total of 776 tunnel-related defects had been identified post-completion. Of these, 370 defects – approximately 48 percent – were successfully closed, reflecting steady progress in addressing punch-list items. The principal types of defects encompassed minor civil finishes, mechanical and electrical adjustments, and validations of final safety systems. Importantly, the introduction of a collaborative defect verification process between Project Co and the D&C Subcontractor improved overall efficiency, reduced the risk of disputes, and helped expedite the close-out phase.

Operational readiness was maintained through routine inspections, commissioning adjustments, and comprehensive safety checks conducted throughout the period. Tunnel systems, including fire and life safety infrastructure, drainage, and egress routes, were rigorously tested and commissioned. Any outstanding issues identified during these processes were systematically addressed as part of ongoing defect closure efforts. Remaining tasks during the period primarily focused on finalizing documentation, undertaking minor repairs – such as segment leak repairs and architectural panel adjustments – and verifying completed works to ensure full compliance with project requirements and safety standards.

- As of 14 December 2025, all major building structures, including portal buildings and control centres, had reached substantial completion. The subsequent period, spanning September 2025 to February 2026, concentrated on finalizing architectural finishes, completing internal fit-outs, and executing the last stages of landscaping.

Within the close-out phase, a total of 168 building-related defects were registered. By the end of February 2026, 100 of these defects – approximately 60 percent – had been resolved. Outstanding items largely related to minor finishing works, adjustments to building services such as HVAC and electrical systems, and the resolution of commissioning snags. Building systems, including security, fire, and building management systems (BMS), underwent final rounds of testing and were progressively handed over for operational use.

The Freeway Control Centre (FCC) and associated facilities achieved operational readiness during this period, with fit-out and landscaping works brought to completion and any remaining defects addressed through the agreed management process. Ongoing works included the finalization of project documentation and as-built drawings, as well as the resolution of any issues arising from operational testing or user feedback, thereby ensuring a smooth transition from construction to full operation.

- Mechanical, electrical and instrumentation works across the project were completed, with only minor defects remaining. The commissioning in the West and East was completed. Within the tunnel, the remainder of the installation and commissioning was completed.

### **East –**

- During this period, a range of finishing works were completed across the East to achieve the successful opening of the West Gate Tunnel Project. Barrier rail and signage installation were finalised throughout the area. Landscaping works were also completed adjacent to the Maribyrnong River and within Port Phillip Monument Park. In addition, coating repairs were completed on Smithfield Bridge. On Footscray Road, reconstruction of the Loop Road was completed, and the BMX tracks were also finalised. Demobilisation of the Flower Market site sheds was successfully completed, concluding temporary site infrastructure at this location.



Photo 1 – Wurundjeri Way extension intersection (Source: WGTP VIDA Roads, October 2025)

## 2.4 Audit Findings Classification

Audit findings are classified in each audit according to the following definitions which are aligned with classifications provided by AS/NZS ISO14001: 2015, the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), and audit classifications utilised on previous high-profile Victorian infrastructure projects. The definitions of conformance, non-conformance, opportunity for improvement, observation, and not applicable are provided below.

### Conformance

There is suitable evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the auditable element. Findings are reported by exception only, and as such conformances are not detailed within this report.

### Non-conformance

An instance, event or occurrence that has not fulfilled a requirement that has been specified in the Strategy, CEMP, WEMP, EPRs, legislation, and approval conditions. A situation, which would, on the basis of available objective evidence raise significant doubt as to the effectiveness of environmental management.

### Opportunity for Improvement

A deficiency in the implementation of the Strategy, CEMP, WEMPs, or associated 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. Observations are also made to note a positive improvement on the Project.

## 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. Findings are reported by exception only, and as such 'Not Applicable' findings are not detailed within this report.

It should be noted that the audit only reports on non-conformances, areas for improvement and observations against the CEMP findings. All other areas within the scope of the audit should be assumed to be compliant. Where EPRs have been audited, compliance findings are also included.

The IREA does not require observations to be formally closed out after they have been issued and therefore will not report these in subsequent audit reports. It is the responsibility of the D&C Subcontractor and Project Co to address these findings.

## Significance of Findings

The nature of findings may vary. In reviewing the results of audit findings, it is necessary to understand the context in which they have been issued. For instance, some findings may be administrative in nature compared with those that pose an immediate and/or significant risk to the environment. An example of an administrative finding might include the requirement for the D&C Subcontractor to use a particular system to record incidents, where this is defined in the CEMP. However, if the D&C Subcontractor 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. The D&C Subcontractor in this case may not be conforming with the original CEMP (which is captured as a non-conformance in an audit), but it does not necessarily mean that incidents are not being reported. This requirement is likely to be modified in the next version of the CEMP. Administrative findings therefore do not always pose a significant risk to the environment.

Alternatively, if the D&C Subcontractor was found to have caused an incident resulting in a discharge to the river, this would be viewed as an environmental non-conformance of greater significance.

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



Photo 2 – Elevated roadway across the Maribyrnong River on Project opening day (Source: WGTP VIDA Roads, November 2025)

### 3 SIX-MONTHLY AUDIT FINDINGS

The key findings arising from the IREA's most recent six months of auditing are included in the sub-sections below.

- Section 3.1 summarises audit findings of the Strategy.
- Section 3.2 outlines findings of formal auditing and checking of EPRs.
- Section 3.3 describes audit findings against the CEMP and subplans.
- Section 3.4 provides findings of the WEMP audits.

#### 3.1 Environmental Management Strategy

Audits of the Strategy are conducted six-monthly, with no audits conducted during this reporting period<sup>4</sup>.

#### 3.2 Environmental Performance Requirements

The majority of EPRs formally audited during this reporting period were considered compliant. No non-conformances were raised during this reporting period. However, one (1) opportunity for improvement and three (3) observations were raised. The following sub-sections focuses on non-conformances and opportunities for improvement raised in this reporting period and previous reporting periods.

Project Co / the D&C Subcontractor is responsible for delivering the majority of EPRs listed below unless otherwise specified as being delivered by the State.

##### 3.2.1 Environmental Management

One (1) environmental management EPR was audited during this reporting period, namely EMP2. This EPR was deemed compliant.

###### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to related CEMP findings in Section 3.3.

##### 3.2.2 Air Quality

Zero (0) air quality EPRs were audited during this reporting period.

###### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to related Air Quality Management Plan findings in Section 3.3.1.

##### 3.2.3 Business

Seven (7) business EPRs were audited during this reporting period, namely BP2, BP3, BP4, BP5, BP6, BP7 and BP8. All were deemed compliant.

###### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to related Business Involvement Plan findings in Section 3.3.14.

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<sup>4</sup> The March 2026 EMS audit will be reported in the next Minister's Report.

### 3.2.4 Cultural Heritage

One (1) cultural heritage EPR was audited during this reporting period, namely CHP3, and was deemed compliant.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to related Heritage Management Plan findings in Section 3.3.8.

### 3.2.5 Contaminated Soil and Spoil Management

Two (2) contaminated soil and spoil management EPRs were audited during this reporting period, namely CSP2 and CSP4. Both were deemed compliant.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to related Soil and Spoil Management Plan findings in Section 3.3.10.



Photo 3 – Tunnel Commissioning (Source: WGTP VIDA Roads, November 2025)

### 3.2.6 Ecology

One (1) ecology EPR was audited during this reporting period, namely EP3. The EPR was deemed compliant.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Flora and Fauna Management Plan findings in Section 3.3.4.

## **3.2.7 Greenhouse Gas Emissions**

Zero (0) greenhouse gas emission EPRs were audited during this reporting period.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Energy Management Plan findings in Section 3.3.3.

## **3.2.8 Ground Movement**

Two (2) ground movement EPRs were audited during this reporting period, namely GMP1 and GMP3. GMP1 was deemed compliant, however, GMP3 remains as an open opportunity for improvement.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Ground Movement Management Plan findings in Section 3.3.5.

## **3.2.9 Groundwater**

Zero (0) groundwater EPRs were audited during this reporting period.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Groundwater Management Plan findings in Section 3.3.6.

## **3.2.10 Land Use**

Two (2) land use EPRs were audited during this reporting period, namely LPP2 and LPP5. Both were deemed compliant.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Landscape Management Plan findings in Section 3.3.13.

## **3.2.11 Landscape and Visual**

Two (2) landscape and visual EPRs were audited during this reporting period, namely LVP2 and LVP3. Both were deemed compliant.

### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to related Landscape Management Plan findings in Section 3.3.13.

### 3.2.12 Noise and Vibration

Five (5) noise and vibration EPRs were audited during this reporting period, namely NVP4, NVP6, NVP7, NVP8 and NVP18. All were deemed compliant.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to Construction Noise and Vibration Management Plan findings in Section 3.3.2.



Photo 4 – Dixon Veloway (Source: WGTP VIDA Roads, September 2025)

### 3.2.13 Social

Zero (0) social EPRs were audited during this reporting period.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

### 3.2.14 Surface Water

Three (3) surface water EPRs were audited during this reporting period, namely SWP6, SWP7 and SWP8. All were deemed compliant.

#### Previous reporting period

Zero (0) findings remain open from previous reporting periods.

Refer also to Water Management Plan findings in Section 3.3.12.

### 3.2.15 Transport

One (1) transport EPR was audited this reporting period, namely TP2. This EPR was deemed compliant.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

### 3.2.16 Waste Management

One (1) waste management EPR was audited during this reporting period, namely WMP1. This EPR was deemed compliant.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to Waste Management Plan findings in Section 3.3.11.

## 3.3 Construction Environmental Management Plan

### Overview

CEMP audits are conducted on a quarterly basis, with two CEMP audits conducted during the reporting period.

During the November 2025 audit, the following management plans and sections were audited:

- CEMP (Element 1, Element 3, Element 4, and Element 9)
- Heritage Management Plan (Section 4 and Section 5)
- Lighting Management Plan (Section 4 and Section 5)
- Soil and Spoil Management Plan (Section 4 and Section 5)

During the February 2026 audit the following management plans and sections were audited:

- CEMP (Element 4, Element 5, Element 9, and Element 10)
- Business Involvement Plan (Section 3)
- Construction Noise and Vibration Management Plan (Section 5)
- Waste Management Plan (Section 4)

### Current Reporting Period

Zero (0) non-conformances were identified during this reporting period. However, two opportunities for improvement were raised regarding CEMP Element 1.1 (Leadership, Accountability and Culture) and CEMP Element 10.4 (Emergency Planning and Response).

### Previous Reporting Periods

No findings remained outstanding from previous audit periods, therefore meaning zero (0) findings were closed out during this reporting period.

### 3.3.1 Air Quality Management Plan

The Air Quality Management Plan (AQMP) was not specifically audited during this reporting period.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.2 for findings relating to air quality EPRs.

### **3.3.2 Construction Noise and Vibration Management Plan**

Zero (0) non-conformances or opportunities for improvement were raised against the Construction Noise and Vibration Management Plan (CNVMP) during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.12 for findings relating to noise and vibration EPRs.

### **3.3.3 Energy Management Plan**

The Energy Management Plan (EMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.7 for findings relating to greenhouse gas emissions EPRs.

### **3.3.4 Flora and Fauna Management Plan**

The Flora and Fauna Management Plan (FFMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.6 for findings relating to ecology EPRs.

### **3.3.5 Ground Movement Management Plan**

The Ground Movement Management Plan (GMMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.8 for findings relating to ground movement EPRs.

### **3.3.6 Groundwater Management Plan**

The Groundwater Management Plan (GWMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.9 for findings relating to groundwater EPRs.

### **3.3.7 Hazardous Substances Management Plan**

The Hazardous Substances Management Plan (HSMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.14 for findings relating to hazardous substances EPRs.

### 3.3.8 Heritage Management Plan

Zero (0) non-conformances or opportunities for improvements were raised against the Heritage Management Plan (HMP) during this reporting period.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.4 for findings relating to cultural heritage EPRs.

### 3.3.9 Lighting Management Plan

Zero (0) non-conformances or opportunities for improvements were raised against the Lighting Management Plan (LMP) during this reporting period.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.5 for findings relating to lighting management EPRs.

### 3.3.10 Soil and Spoil Management Plan

Zero (0) non-conformances or opportunities for improvements were raised against the Soil and Spoil Management Plan (SSMP) during this reporting period.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

Refer also to Section 3.2.5 for findings relating to soil and spoil EPRs.



Photo 5 – Northern Portal (Source: WGTP VIDA Roads, December 2025)

### **3.3.11 Waste Management Plan**

Zero (0) non-conformances or opportunities for improvements were raised against the Waste Management Plan (WstMP) during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer also to Section 3.2.16 for findings relating to waste EPR.

### **3.3.12 Water Management Plan**

The Water Management Plan (WMP) was not specifically audited during this reporting period.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

Refer to Section 3.2.14 for findings relating to surface water EPRs.

### **3.3.13 Landscape Management Plan**

The Landscape Management Plan (LdMP) was not specifically audited during this reporting period.

The LdMP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the LdMP, which are required to demonstrate how these and other EPRs will be complied with.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

### **3.3.14 Business Involvement Plan**

Zero (0) non-conformances or opportunities for improvements were raised against the Business Involvement Plan (BIP) during this reporting period.

The BIP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the BIP, which are required to demonstrate how these and other EPRs will be complied with.

#### **Previous reporting periods**

Zero (0) findings remained open against the BIP from previous reporting periods.

Refer to Section 3.2.3 for findings relating to business EPRs.

### **3.3.15 Construction Communications and Community Engagement Plan**

The Construction Communications and Community Engagement Plan (CCCEP) was not specifically audited during this reporting period.

The CCCEP is not a subplan to the CEMP. The CEMP refers to a suite of other management plans, including the CCCEP, which are required to demonstrate how these and other EPRs will be complied with.

#### **Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.

### 3.4 Worksite Environmental Management Plan

WEMP audits are conducted monthly, with six WEMP audits conducted during this reporting period. A total of fifteen (15) findings were raised in this reporting period and seven (7) in the previous reporting period.

Findings raised during this reporting period comprised:

- Zero (0) non-conformances.
- Four (4) opportunity for improvement.
- Eleven (11) observations.

Of all WEMP findings:

- 27% related to accuracy of WEMP documentation.
- 20% related to the implementation of tree protection measures.
- 20% related to general waste management on site.
- 13% related to inadequate sediment controls and mud tracking.
- Remaining 20% related to storage of hazardous chemicals, water management, and the Out of Hours Works process.

These figures are reflective of the types of works happening across the Project during the reporting period.

Three (3) opportunities for improvement were closed during this reporting period, and one (1) finding remains open from previous reporting periods.

#### 3.4.1 West Zone

Refer to Section 2.3.1 for an update on construction activities in the West Zone.

One (1) observation was raised during WEMP audit of the West Zone in this reporting period relating to storage of construction materials onto previously landscaped areas.

One (1) opportunity for improvement was raised during the WEMP audit of the West Zone in this reporting period relating to the implementation of WEMPs in accordance with requirements outlined in the CEMP and Construction Packages/Procedures.

#### Previous reporting periods

Zero (0) findings remain open from previous reporting periods.

#### 3.4.2 Tunnel Zone

Refer to Section 2.3.1 for an update on construction activities in the Tunnel Zone.

Ten (10) observations were raised during WEMP audits of the Tunnel Zone in this reporting period relating to locations of physical environmental controls, stockpile management, control of environmental risks via onsite environmental controls, updating the WEMP to reflect changes to activities or site risks, air quality and dust, hazardous substances, construction hours of work, flora and fauna, and soil and water.

Three (3) opportunities for improvement were raised during WEMP audits of the Tunnel Zone in this reporting period relating to flora and fauna, hazardous substances, and the effectiveness of onsite environmental controls in controlling environmental risks.

#### Previous reporting periods

One (1) finding remains open from previous reporting periods relating to soil and spoil.

#### 3.4.3 East Zone

Refer to Section 2.3.1 for an update on construction activities in the East Zone.

The East Zone was not specifically audited during this reporting period.

**Previous reporting periods**

Zero (0) findings remain open from previous reporting periods.



*Photo 6 – West Gate Tunnel Open to Public Traffic (Source: WGTP VIDA Roads, December 2025)*

## 4 AUDIT CONCLUSIONS

### Environmental Management Strategy

Audits of the Strategy are conducted six-monthly, with no audit conducted during this reporting period.<sup>5</sup>

### Environmental Performance Requirements

During the last six-month reporting period the IREA formally audited 29 EPRs. The majority of EPRs audited during the reporting period were deemed compliant. The findings raised consisted of:

- Zero (0) non-conformances were raised during this audit period.
- One (1) opportunity for improvement was raised.
- Three (3) observations were raised during this audit period.

Zero (0) audit findings were closed from previous reporting periods. In total there is one (1) finding remaining open at the end of this reporting period, noting that observations do not remain open beyond the initial audit in which they are raised.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status.

### Construction Environmental Management Plan

The last six-month reporting period focused on auditing a range of CEMP elements and subplans.

The CEMP audit findings for the November 2025 quarterly audit is summarised below:

- Zero (0) non-conformances were raised during this audit.
- One (1) opportunity for improvement was raised during this audit.
- One (1) observation was raised during this audit.

The CEMP audit findings for the February 2026 quarterly audit is summarised below:

- Zero (0) non-conformances were raised during this audit.
- One (1) opportunity for improvement was raised during this audit.
- One (1) observation was raised during this audit.

Zero (0) opportunities for improvement were closed from previous reporting periods. In total there are two (2) findings remaining open at the end of this reporting period.

Details of the CEMP findings are listed in Section 3.3.

### Worksite Environment Management Plans

During the reporting period six WEMP audits were conducted. A total of fifteen (15) findings were raised in this reporting period. These consisted of:

- Zero (0) non-conformances.
- Four (4) opportunities for improvement.
- Eleven (11) observations.

The IREA will continue to focus on how Project Co and the D&C Subcontractor demonstrate compliance with Project environmental requirements. Project Co and the D&C Subcontractor have continued to provide evidence to close out audit findings, including three (3) WEMP findings closed out since the previous reporting period. In total there is one (1) finding remaining open at the end of this reporting period, noting that observations do not remain open beyond the initial audit in which they are raised.

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<sup>5</sup> The March 2026 EMS audit will be reported in the next Minister's Report.

The WEMP findings are further detailed in Section 3.4.

### **Conclusions**

The findings arising from the reporting period by the IREA have not identified any immediate significant or material risks to the environment.

Implementation of the EPRs was found to be compliant, with one (1) opportunity for improvement and three (3) observations during the reporting period.

Three (3) audit findings from previous reporting periods were closed, consisting of three (3) WEMP opportunities for improvement. In total there are four (4) findings remaining open from the CEMP audits and WEMP audits at the end of this reporting period.

A full list of EPR findings raised and the status of previous findings is detailed in Section 3.2. Also refer to Appendix A for a summary of EPR compliance status.

Operational audits of OpCo commence in March 2026 and will be reported in the next Minister's Report.



*Photo 7 – Williamstown Road-Melbourne Road interchange (Source: WGTP VIDA Roads, December 2025)*

## **APPENDIX A- EPR AUDITING STATUS**

Appendix A only includes the EPR Auditing Status for the Construction / DLP Phase as of February 2026, including identification of those EPRs which are considered “Closed”. The next Minister’s Report will incorporate auditing results from both the Construction / DLP Phase and the Operational Phase. Some EPRs considered “Closed” for Construction / DLP will be audited during Operations, for example AQP2, AQP3 and AQP4.

Phase: D = Design; PC = Pre-construction; C = Construction; PC = Pre-operation; O = Operation

Type of review and surveillance: MP = Management Plan; DP = Design Package; CR = Construction Documentation Review; CS = Construction Surveillance

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)	Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase	
<b>ENVIRONMENTAL MANAGEMENT</b>																
EMP1	Environmental Management Strategy	X								X				All	The IREA audited this EPR in August 2018 and it was deemed compliant. The IREA do not intend to audit this EPR again during the DLP unless the EMS is updated.	Project Co (WGTP VIDA Roads will publish the Strategy)
EMP2	Environmental Management Plans	X		X	X	X			X	X				All	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C / OpCo
EMP3	Environmental Compliance									X				PC, C, O	The IREA audited this EPR in February 2025 and it was deemed compliant.	D&C / OpCo (WGTP VIDA Roads will forward audit reports to Minister for Planning and will publish audit reports only)
EMP4	Complaints Management System	X				X								PC, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
<b>AIR QUALITY</b>																
AQP1	Tunnel Ventilation System Design		X			X								D, C	This EPR is considered closed as of February 2026.	D&C
AQP2	Zero Portal Emissions		X		X					X				D, O	This EPR is considered closed as of February 2026.	D&C / OpCo
AQP3	In Tunnel Air Quality		X		X					X				D, O	This EPR is considered closed as of February 2026.	D&C / OpCo
AQP4	Ambient Air Quality Monitoring	X			X	X				X				C, O	This EPR is considered closed as of February 2026.	D&C / OpCo
AQP5	In Tunnel Air Quality and Ventilation Structure Emissions Compliance									X				O	Not applicable to construction & DLP phase.	OpCo
AQP6	Air Quality During Construction	X		X	X	X								C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
AQP7	Roadside Air Quality Mitigation Strategy									X				O	Not applicable to construction & DLP phase.	WGTP VIDA Roads
<b>BUSINESS</b>																
BP1	Damage or Impacts on Third Party Property and Infrastructure	X	X	X	X		X							D, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
BP2	Access and Amenity for Business and Commercial Facilities		X	X	X									D, C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C
BP3	Screening		X	X	X									C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C
BP4	Impacts on Operation of Community, Private		X	X	X								X	All	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C / OpCo

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)	Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase	
	Recreation and Council Facilities and Services															
BP5	Business Involvement Plan	X		X	X				X					PC, C D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
BP6	Utility Assets		X	X	X				X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
BP7	Gas Utilities		X	X	X				X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
BP8	Business Disruption		X	X	X				X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
BP9	Business Acquisition Process		X	X	X									D, C	This EPR is considered closed as of February 2026.	WGTP VIDA Roads
<b>CULTURAL HERITAGE</b>																
CHP1	Cultural Heritage Management Plan	X	X	X	X	X								D, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
CHP2	Design and Construction to Minimise Impacts on Heritage		X	X	X		X							D, PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
CHP3	Archaeological Management Plan	X		X	X			X						PC, C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C
CHP4	Monitoring of Heritage Sites and Places		X	X	X									C	This EPR is considered inactive as of February 2026.	D&C
CHP5	Archival Photographic Records		X											PC	This EPR is considered inactive as of February 2026.	D&C
CHP6	Port Phillip Monument		X				X							D, C	This EPR is considered inactive as of February 2026.	D&C
CHP7	Heritage Interpretation Strategy	X	X				X							PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
CHP8	Shipwrecks	X	X	X	X									PC, C	This EPR is considered inactive as of February 2026.	D&C
CHP9	Maribyrnong River Front (Footscray)		X	X	X	X								D	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
CHP10	Bluestone Bridge		X			X								C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
CHP11	Rail Turntables		X	X	X									D	This EPR is considered inactive as of February 2026.	D&C
CHP12	Flinders Street					X								C	This EPR is considered inactive as of February 2026.	D&C
<b>CONTAMINATED SOIL AND SPOIL MANAGEMENT</b>																
CSP1	Contaminated Soil Requirements	X	X	X	X	X								C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)		Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase		
CSP2	Contaminated Soil and Spoil Management	X	X	X	X	X		X						PC, C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C	
CSP3	Acid Sulphate Soil	X		X	X	X								PC, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C	
CSP4	Odour Management	X		X	X			X						C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C	
<b>ECOLOGY</b>																	
EP1	Minimise Vegetation Removal and Disturbance		X	X	X		X							D, PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C	
EP2	Vegetation Protection Measures	X	X	X	X		X							PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C	
EP3	Reinstatement		X	X	X				X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
EP4	Fauna Management Measures	X	X	X	X		X							PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C	
EP5	Works on Waterways		X	X	X	X								D, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C	
EP6	Landscaping Plan		X				X							D, PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C	
EP7	Vegetation Offsets	X		X	X									C	This EPR is considered closed as of February 2026.	WGTP VIDA Roads / D&C	
<b>GREENHOUSE GAS EMISSIONS</b>																	
GGP1	Greenhouse Gas Emissions		X	X	X									D	This EPR is considered closed as of February 2026.	D&C	
GGP2	Emissions Reduction		X	X	X	X								D, C	This EPR is considered inactive as of February 2026.	D&C	
<b>GROUND MOVEMENT</b>																	
GMP1	Geotechnical Model and Assessment		X	X	X				X					PC, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
GMP2	Tunnel and Portal Drainage		X	X	X		X							D, C	This EPR is considered inactive as of February 2026.	D&C	
GMP3	Condition Surveys and Determination of Settlement Criteria for Property and Infrastructure		X	X	X	X		X	X		X			PC, C, O	The IREA audited this EPR in November 2025 and February 2026. An opportunity for improvement identified during the November 2025 audit (Nov-25_EPR_09) remains open.	D&C / OpCo	
GMP4	Settlement Criteria for Utilities		X	X	X		X							PC	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C	
GMP5	Ground Movement Monitoring	X	X	X	X						X			PC, C, O	The IREA audited this EPR in February 2025 and it was deemed compliant.	D&C / OpCo	

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)	Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase	
GMP6	Mitigation of Ground Movement Impact	X	X	X	X		X				X			C, O	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C / OpCo
<b>GROUND WATER</b>																
GWP1	Groundwater Management Measures	X	X	X	X		X				X			PC, C, O	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C / OpCo
GWP2	Protection of Groundwater Quality	X		X	X		X							C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
GWP3	Tunnel Drainage Design and Construction Methods		X	X	X									D, PC, C	This EPR is considered inactive as of February 2026.	D&C
GWP4	Predictive Groundwater Model		X	X	X		X							PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
GWP5	Groundwater Monitoring			X	X		X				X			PC, C, O	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C / OpCo
GWP6	Interception of Groundwater	X	X	X	X		X							C	The IREA audited this EPR in August 2025 and it was deemed compliant.	D&C
GWP7	Impacts on Groundwater Users		X	X	X		X							PC, C	This EPR is considered closed as of February 2026.	D&C
<b>LAND USE</b>																
LPP1	Minimise Design Footprint		X											D	This EPR is considered inactive as of February 2026.	D&C
LPP2	Recreation Facilities		X	X	X				X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
LPP3	Future Development Opportunities		X											D	This EPR is considered inactive as of February 2026.	D&C
LPP4	Pedestrian and Bicycle Connections		X											D	This EPR is considered inactive as of February 2026.	D&C
LPP5	Public Land		X	X	X				X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
<b>LANDSCAPE AND VISUAL</b>																
LVP1	Urban Design Approach		X	X	X									D, C	This EPR is considered inactive as of February 2026.	D&C
LVP2	Reinstatement Following Temporary Works		X						X					D, C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C
LVP3	Light Spillage	X	X	X	X				X					D, C	The IREA audited this EPR in November 2025 and it was deemed compliant.	D&C
LVP4	Vegetation Screening		X											C	This EPR is considered inactive as of February 2026.	D&C
LVP5	Design Review								X					D	This EPR is considered closed as of February 2026.	WGTP VIDA Roads (on receipt of relevant design)

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)		Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase		
																	documentation in accordance with the design review process)
<b>NOISE AND VIBRATION</b>																	
NVP1	Traffic Noise Limits		X	X	X		X							D, C	The IREA audited this EPR in August 2025 and it was deemed compliant.		D&C
NVP2	Traffic Noise Reduction of Open Space		X	X	X	X								D, C	This EPR is considered inactive as of February 2026.		D&C
NVP3	Maintenance of Noise Mitigation Measures									X				O	Not applicable to construction & DLP phase.		OpCo (for the maintenance of noise mitigation measures in accordance with sections 18.4 and 18.5 of Part B, otherwise WGTP VIDA Roads)
NVP4	Traffic Noise Reduction of Millers Road North of West Gate Freeway													PO	This EPR is considered closed as of February 2026.		State
NVP5	Construction of Noise Barriers		X	X	X	X								C	This EPR is considered inactive as of February 2026.		D&C
NVP6	Traffic Noise Monitoring		X							X				PO, O	This EPR is considered closed as of February 2026.		OpCo (for the O&M phase in accordance with sections 18.4 and 18.5 of Part B, otherwise WGTP VIDA Roads)
NVP7	Construction Noise, Vibration Management, and Monitoring	X		X	X		X		X					PC, C	The IREA audited this EPR in February 2026 and it was deemed compliant.		D&C
NVP8	Construction Noise Targets			X	X		X		X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.		D&C
NVP9	Blasting Trials and Assessment													C	This EPR is considered inactive as of February 2026.		D&C
NVP10	Construction Vibration Targets (Amenity)			X	X		X							C	The IREA audited this EPR in August 2025 and it was deemed compliant.		D&C
NVP11	Construction Vibration Targets (Structures)			X	X		X							C	The IREA audited this EPR in August 2025 and it was deemed compliant.		D&C
NVP12	Ground-borne (Internal) Noise Targets					X								C	The IREA audited this EPR in May 2025 and it was deemed compliant.		D&C
NVP13	Utility Asset Protection		X	X	X		X							PC, C	The IREA audited this EPR in August 2025 and it was deemed compliant.		D&C
NVP14	Tunnel Ventilation System Noise Design				X					X				D, O	This EPR is considered closed as of February 2026.		D&C / OpCo
NVP15	Tunnel Ventilation System Noise Monitoring									X				O	Not applicable to construction & DLP phase.		OpCo

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)		Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase		
NVP16	Amenity Blast Vibration													C	This EPR is considered inactive as of February 2026.	D&C	
NVP17	Amenity Blast Overpressure Implement													C	This EPR is considered inactive as of February 2026.	D&C	
NVP18	Construction Noise Management	X		X	X		X		X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
NVP19	Traffic Noise of Hyde Street, South of Francis Street													C	This EPR is considered closed as of February 2026.	WGTP VIDA Roads	
<b>SOCIAL</b>																	
SP1	Urban Design Principles and Vision		X			X								D	This EPR is considered inactive as of February 2026.	D&C	
SP2	Communications and Community Engagement Plan (CCEP)	X		X	X	X						X		PC, C, O	The IREA audited this in May 2025 and it was deemed compliant.	D&C / OpCo	
SP3	Community Liaison Group Participation													C	This EPR is considered closed as of February 2026.	D&C / WGTP VIDA Roads	
SP4	Social and Local Procurement	X												PC, C	The IREA audited this EPR in February 2025 and it was deemed compliant.	D&C	
SP5	Community Involvement and Participation Plan (CIPP)	X												PC, C	This EPR is considered closed as of February 2026.	WGTP VIDA Roads	
<b>SURFACE WATER</b>																	
SWP1	Design of Discharges and Runoff		X											D	This EPR is considered inactive as of February 2026.	D&C	
SWP2	Water Sensitive Road Design		X											D	This EPR is considered closed as of February 2026.	D&C	
SWP3	Tunnel Waste Water		X	X	X									PC	This EPR is considered closed as of February 2026.	D&C	
SWP4	Water Quality Monitoring	X		X	X									PC	This EPR is considered closed as of February 2026.	D&C	
SWP5	Spill Containment Design		X		X									D	This EPR is considered inactive as of February 2026.	D&C	
SWP6	Management of Chemicals, Fuels, and Hazardous Materials	X		X	X	X			X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
SWP7	Surface Water Management During Construction	X		X	X	X			X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
SWP8	Use of non-potable water		X	X	X				X					C	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C	
SWP9	Bank Stability		X	X	X	X								C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C	

Environmental Performance Requirements		Review & Surveillance				Construction / DLP Auditing				O&M Auditing				Phase *	Audit and Audit Findings Status (as of February 2026)	Responsible Party
		MP	DP	CR	CS	25-May	25-Aug	25-Nov	26-Feb	26-Mar	26-Jun	26-Sep	26-Dec		Construction & DLP Phase	
SWP10	Waterway Modifications		X			X								D, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
SWP11	Flood Levels, Flows and Velocities		X	X	X	X								D, PC, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
SWP12	Floodplain Storage Capacity		X	X	X									D	This EPR is considered inactive as of February 2026.	D&C
SWP13	Tunnel Portal Flood Risk		X		X					X				D, O	This EPR is considered inactive as of February 2026.	D&C / OpCo
SWP14	Maintenance of Melbourne water and Other Drainage Assets		X	X	X									D	This EPR is considered inactive as of February 2026.	D&C
SWP15	North Yarra Main Sewer		X											D	This EPR is considered closed as of February 2026.	D&C
<b>TRANSPORT</b>																
TP1	Optimise Design Performance		X											D	This EPR is considered inactive as of February 2026.	D&C
TP2	Traffic Monitoring			X	X	X		X				X		PC, C, O	The IREA audited this in November 2025 and it was deemed compliant.	D&C / OpCo
TP3	Traffic Management Plan	X		X	X	X								PC, C	The IREA audited this in May 2025 and it was deemed compliant.	D&C
TP4	Public Transport		X	X	X									PC, C	The IREA audited this EPR in February 2025 and it was deemed compliant.	D&C
TP5	Rail operations		X			X								D, C	The IREA audited this EPR in May 2025 and it was deemed compliant.	D&C
TP6	Design Standards		X		X									D, C	The IREA audited this EPR in August 2021 and it was deemed compliant.	D&C
TP7	Traffic Management Liaison Group			X	X	X								PC, C	This EPR is considered closed as of February 2026.	D&C
TP8	River Navigation		X	X	X									C	The IREA audited this EPR in February 2025 and it was deemed compliant.	D&C
TP9	Melbourne Metro Rail Authority Interface				X									C	This EPR is considered inactive as of February 2026.	D&C
<b>WASTE MANAGEMENT</b>																
WMP1	Waste Management	X	X	X	X				X			X		D, C, O	The IREA audited this EPR in February 2026 and it was deemed compliant.	D&C / OpCo

## **APPENDIX B - IREA SPECIALIST TEAM**

The formal audits described in this Minister's Report have been undertaken by the lead IREA Environment Auditor, Camilla Freestone, and Assistant Environment Auditors, Raisa Gamboa, Roya Mehrpoor and Clemence Neylan. The Lead Auditors were supported by a team of specialists, including (but not limited to):

- IREA Soil and Spoil Subject Matter Expert – Matt Collyer

## **APPENDIX C - AUDIT LIMITATIONS**

This report was prepared in accordance with generally accepted consulting practice for audit services. The environmental audit requires the IREA to apply a process of “general overview and reasonable checking” of the Project documentation and Design and Construction activities (as required under the contract between the IREA and Project Co / WGTP VIDA Roads). The audit program is risk-based, targeting those Design and Construction activities with a potential for risk to the environment or to environmental management arrangements. Accordingly, it is possible that not all environmental issues will be examined during each audit. However, the IREA maintains a structured program of audits designed to cover all aspects of the Project and to enable the formation of an opinion on whether there is conformance with the requirements of the Strategy, CEMP (and subordinate documentation), WEMPs, and the EPRs (as applicable).