

North East Link Program – Central Package

IEA Six-Monthly Environmental Compliance Report – November 2022 to April 2023

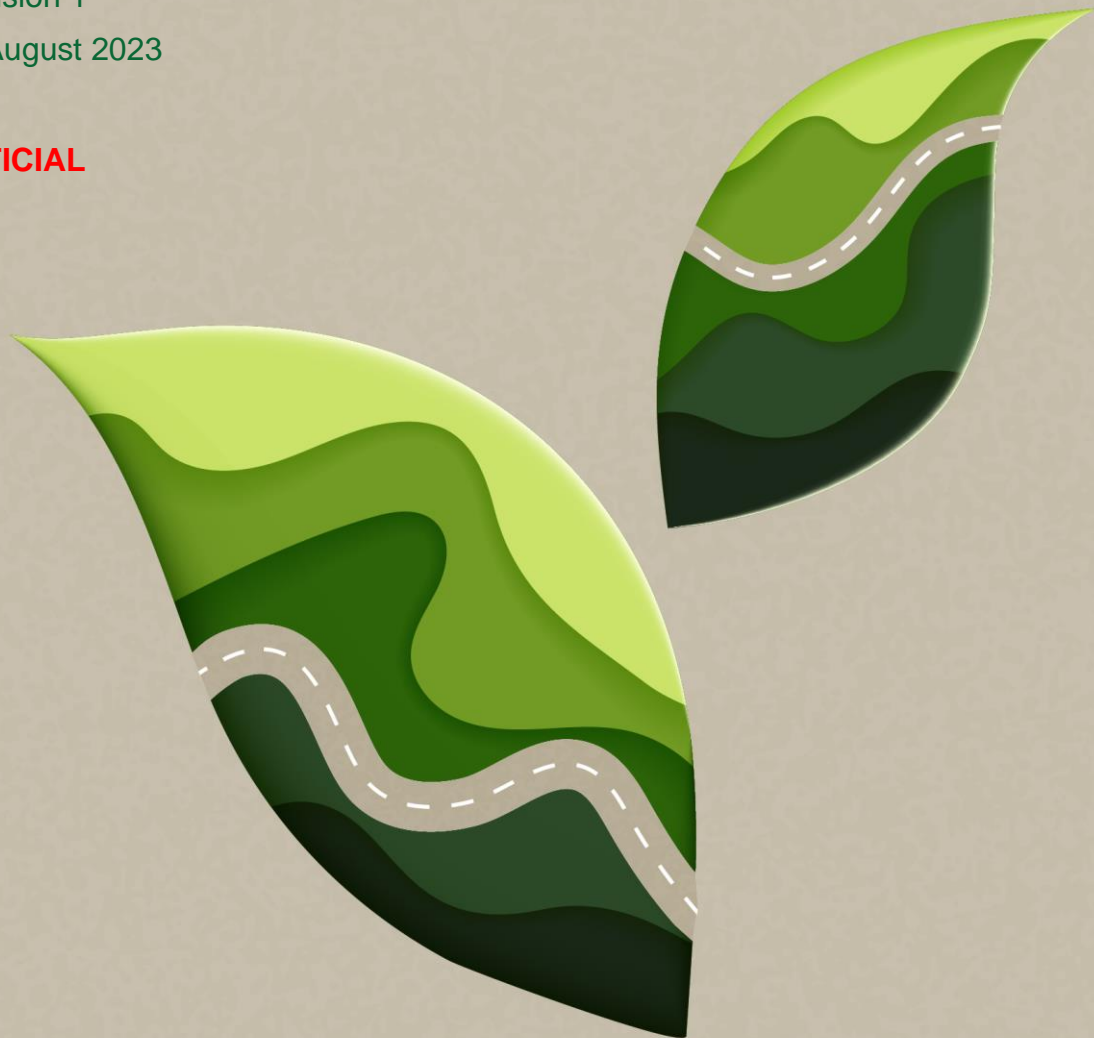
A Report to the Minister for Planning

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OFFICIAL





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Abbreviations

AAAJV	APP, Arup and Aurecon Joint Venture
Afl	Area for Improvement
ASS	Acid Sulphate Soil
CCP	Construction Compound Plan
CEMP	Construction Environmental Management Plan
D&C	Design and Construction
EA	Environmental Auditor
EES	Environment Effects Statement
EMF	Environmental Management Framework
EPA	Environment Protection Authority
EPRs	Environmental Performance Requirements
ERSED	Erosion and Sediment Control (Plan)
FP	Freeway Package
IEA	Independent Environmental Auditor
IFU	Issued for Use
IR	Independent Reviewer
ITS	Intelligent Traffic System
MP	Management Plan
N	Non-compliance
NDD	Non Destructive Drilling
NELP	North East Link Program
O	Observation
OEMP	Operations Environmental Management Plan
PASS	Potential Acid Sulphate Soil
PPP	Public Private Partnership
PSA	Planning Scheme Amendment
PSDR	Project Scope and Delivery Requirements
Spark D&C	Spark Design and Construction (Contractor)
TBM	Tunnel Boring Machine
UDLP	Urban Design and Landscape Plan



UN SDGs	United Nations Sustainable Development Goals
WASS	Waste Acid Sulphate Soil
WEMP	Worksite Environmental Management Plan



Summary

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

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

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

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

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2022 to April 2023.

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

Key Documents	Nov 22 (Monthly)	Dec 22 (Quarterly)	Feb 23 (Monthly)	Mar 23 (Six-monthly)	April 23 (Monthly)
EPRs (as scheduled)		✓		✓	
Environmental Strategy					
Construction Environmental Management Plan		✓ (key elements)		✓ (all elements)	
Management Plans required by the EPRs		✓		✓	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)				✓ (4 CCPs)	

A total of forty-eight (48) audit findings were raised comprising three (3) Non-compliances, 28 Areas for Improvement, and 17 Observations. Thirty-eight (38) findings were closed during the reporting period. Forty-one (41) findings remained open at the end of the reporting period.



Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	4	3	4	3
Afl	21	28	22	27
O	6	17	12	11
Total	31	48	38	41

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

The overall outcomes of the audits conducted showed that both documented environmental management arrangements and on ground environmental management had improved since the previous six month period. However, some of the environmental management documentation had not yet been revised to reflect actual environmental management processes, some on-ground environmental controls were either not in place as required by the works being undertaken, or not fully effective.

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

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

The IEA has reviewed the required Plans separately from the audits.

Compliance with Environmental Performance Requirements

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

Sixty-six (66) EPRs were audited in the reporting period. Six findings were raised against the requirements of the EPRs; one Non-compliance, three Areas for Improvement, and two Observations. The Non-compliance related to the inability of Spark to demonstrate implementation of the Spoil Management Plan. The remaining EPR-related findings were raised against design and process requirements.

Implementation of the Environmental Strategy

No new findings were raised against the requirements of the Environment Strategy during the reporting period, as the Strategy was not in scope for the audits conducted. Two previous findings remain open.

Implementation of the Construction Environmental Management Plan

Five new findings were raised against the requirements of the CEMP; three Areas for Improvement, and two Observations. The findings were process related. Eleven findings from previous reporting periods remained open.

Compliance with the Requirements of the Worksite Environmental Management Plans

Twenty findings were raised against the requirements of the WEMPs during the reporting period; nine Areas for Improvement, and eleven Observations. The findings were related to inadequate on-site environmental controls at specific works areas, and to process issues, reflecting increased construction activities. Sixteen previous findings were closed and nine remain open.



Compliance with the Requirements of the Management Plans

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

Sixteen new findings were raised during the reporting period; two Non-compliances, thirteen Areas for Improvement, and one Observation. The two Non-compliances were raised against the Groundwater Management Plan and the Ground Movement Management Plan as relevant construction activities had commenced without a verified Management Plan in place. The other findings related to inadequate environmental controls at many works areas for sediment control and dust management, and to insufficient implementation of documented environmental management arrangements.

Compliance with the Requirements of the Construction Compound Plans

One Observation was raised against the requirements of one of the approved CCPs relating to rainwater tanks not being installed as defined in the CCP.



1 Background to the audits

1.1 The North East Link Program

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

The North East Link Program (NEL) includes:

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

The Central Package Scope of Works includes:

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

Figure 1 shows an outline of the NEL works.

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

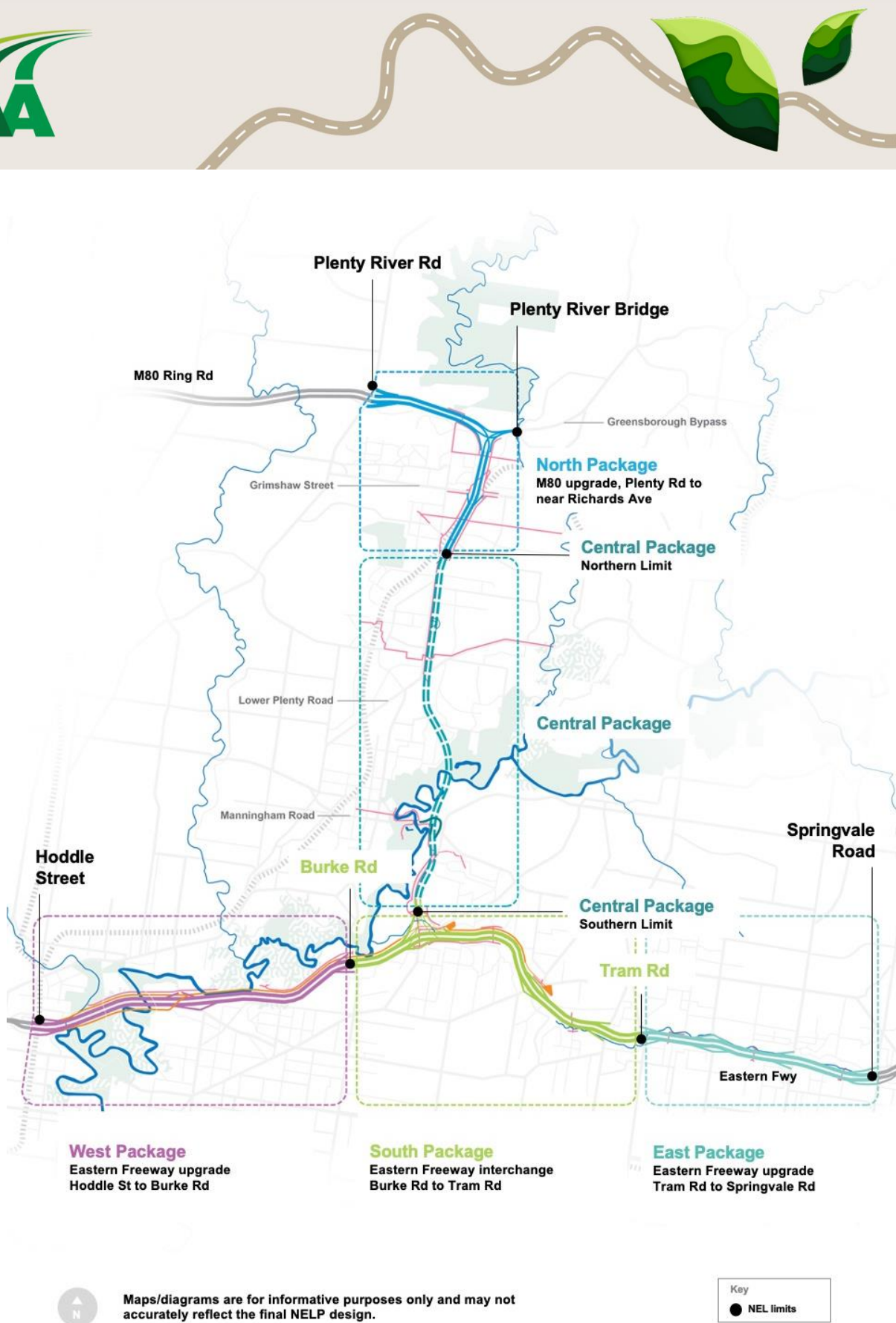


Figure 1: Schematic of the NEL works



1.2 NEL works

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

Project Wide

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

Northern

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

Manningham

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

Tunnels

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

1.3 Purpose of this report

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2022 to April 2023.



2 Environmental Management Requirements

2.1 Environmental Management Framework

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

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

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

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

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

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

The EMF documentation is summarised below in Figure 2.

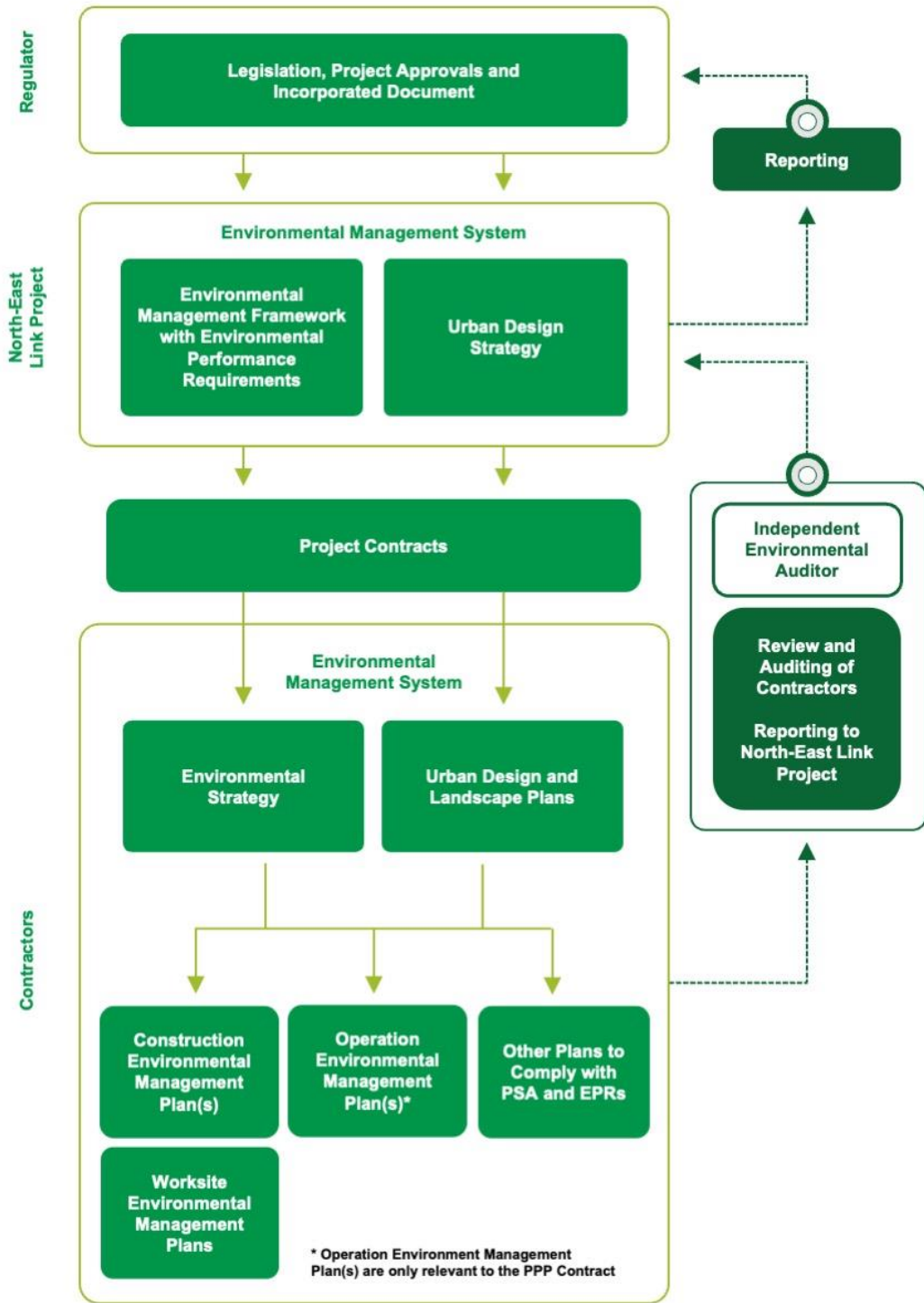


Figure 2: Environmental Documentation

(adapted from the EMF)



2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

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

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

2.3 Requirements of the EMF

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

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

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

2.3.1 Environmental Performance Requirements

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

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

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

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

The requirements applicable to Spark's D&C activities are considered in audit planning. All applicable EPRs are audited, taking a risk based approach, and all EPRs are audited at least once annually. Sixty-six (66) of the EPRs were audited in the reporting period.

2.4 Spark environmental documentation

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

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



- Spoil Management Plan
- Surface Water Management Plan
- Sustainability Management Plan
- Transport Management Plan
- Tree Removal Plan
- Waste Acid Sulfate Soils (WASS) Management Plan.
- WEMPs. These are:
 - Worksite Environmental Management Plan – Site Investigations
 - Worksite Environmental Management Plan – Watsonia - Northern to Yallambie
 - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
 - Worksite Environmental Management Plan – Watsonia - Yallambie to Blamey
 - Worksite Environmental Management Plan – Lower Plenty - Blamey to Drysdale
 - Worksite Environmental Management Plan – Lower Plenty - Drysdale to Lower Plenty Road
 - Worksite Environmental Management Plan – Manningham
 - Worksite Environmental Management Plan – Bulleen
 - Worksite Environmental Management Plan – Bulleen – Southern Road Diversion
 - Worksite Environmental Management Plan – Bulleen Industrial Zone Demolition.
- CCPs. These are:
 - Watsonia Construction Compound Plan (CCP) – Vent Office Compound Stage 1
 - Watsonia Construction Compound Plan (CCP) – TBM Compound
 - Watsonia Construction Compound Plan (CCP) – Civil and Roads Compound Stage 1
 - Lower Plenty Construction Compound Plan (CCP) – Structures Compound
 - Lower Plenty Construction Compound Plan (CCP) – Mobilisation Compound
 - Manningham Construction Compound Plan (CCP) – Mobilisation Compound
 - Manningham Construction Compound Plan (CCP) – SEM Compound
 - Manningham Structural and M&E Works Construction Compound Plan (CCP) – Structural M&E Compound
 - Bulleen Construction Compound Plan (CCP) – Civil, Structural and Roads Compound
 - Bulleen Construction Compound Plan (CCP) – Cut and Cover Compound
 - Winsor Reserve Construction Compound Plan (CCP) – Spoil Handling Facility.

2.5 Role of the Independent Environmental Auditor

The EMF requires an IEA be appointed to undertake reviews of the environmental documentation, and environmental audits of compliance with the documentation required by the Incorporated Document, the EMF, and the EPRs. The overall objective for audits by the IEA is defined in the EMF: *“The Independent Environmental Auditor must conduct regular audits of contractors’ compliance with the EMF, EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, OEMP, any other plans required by the EPRs, conditions of*



Project approvals, and as required by NELP. Audits must occur prior to and during construction and for five years after opening of the Project, or as otherwise agreed with the Minister for Planning.”

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



3 Audit activities

3.1 Environmental documentation verification

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

3.2 Audit program

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

- EPRs are audited at least annually (with more frequent audits for high-risk activities)
- The Environmental Strategy audited at least annually. This frequency is a change for the previous reporting period to reflect the low risk of non-compliance with the Environmental Strategy and the revision of subordinate environmental documentation.
- The environmental management system elements of the CEMP to be audited six-monthly
- The elements of the CEMP critical to effective environmental management to be audited quarterly
- The applicable CEMP sub-plans and Management Plans required by the EPRs to be audited quarterly
- Applicable WEMPs and CCPs audit frequency based on construction activities and environmental risks.

3.3 Audit conduct

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

Each audit includes:

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



Figure 3: Audit process

3.4 Audit objectives, scope, and criteria

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

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

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



Table 1: Summary audit scope

Key Documents	Nov 22 (Monthly)	Dec 22 (Quarterly)	Feb 23 (Monthly)	Mar 23 (Six-monthly)	April 23 (Monthly)
EPRs (as scheduled)		✓		✓	
Environmental Strategy					
Construction Environmental Management Plan		✓ (key elements)		✓ (all elements)	
Management Plans required by the EPRs		✓		✓	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)				✓ (4 CCPs)	

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

3.5 Construction activities during the reporting period

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

Table 2: Construction activities during the reporting period.

Audit date	Construction activities
November 2022	<ul style="list-style-type: none"> • Site establishment and civil works • Clearing and grubbing including tree removal • Piling • Excavation and spoil removal • Traffic management • Bulleen Industrial Zone stripping and demolition • Winsor Reserve stripping and vegetation clearing • Drilling of geotechnical and groundwater investigation bores • Disposal of NDD waste.
December 2022	<ul style="list-style-type: none"> • Site establishment and civil works • Clearing and grubbing including tree removal • Piling • D-Walling • Excavation and spoil removal • Installation and maintenance of environmental controls • Traffic management • Bulleen Industrial Zone stripping and demolition • Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works • Drilling of geotechnical and groundwater investigation bores • Disposal of NDD waste.



Audit date	Construction activities
February 2023	<ul style="list-style-type: none"> • Site establishment and civil works • Clearing and grubbing including tree removal • Piling • D-Walling • Excavation and spoil removal • Trinity Lake partial dewatering • Installation and maintenance of environmental controls • Traffic management • Bulleen Industrial Zone stripping and demolition • Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works • Drilling of geotechnical and groundwater investigation bores • Disposal of NDD waste.
March 2023	<ul style="list-style-type: none"> • Site establishment and civil works including installation of construction compounds • Clearing and grubbing including tree removal • Piling • D-Walling • Excavation and spoil removal • Trinity Lake back filling • Installation and maintenance of environmental controls • Traffic management • Bulleen Industrial Zone stripping and demolition • Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works • Drilling of geotechnical and groundwater investigation bores • Disposal of NDD waste.
April 2023	<ul style="list-style-type: none"> • Site establishment and civil works including installation of construction compounds • Clearing and grubbing including tree removal • Piling • D-Walling • Excavation and spoil removal • Trinity Lake back filling • Tree removal at Trinity South and SRD near Carey • Operation of Holcim batch plant at Manningham BIZ • Installation and maintenance of environmental controls • Utility relocation • Traffic management • Bulleen Industrial Zone stripping and demolition • Winsor Reserve site establishment including tree removal, vegetation clearing and preparatory civil works • Disposal of NDD waste.



4 Audit outcomes

4.1 Audit findings classifications

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

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

4.1.1 Significance of audit findings

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

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

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



4.2 Overall audit findings

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

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

Table 3: Total audit findings November 2022 – April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	4	3	4	3
Afl	21	28	22	27
O	6	17	12	11
Total	31	48	38	41

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

A total of forty-eight (48) audit findings were raised comprising three (3) Non-compliances, 28 Areas for Improvement, and 17 Observations.

Most of the audit findings were raised in the March 2023 six-monthly audit, which assessed compliance against the requirements of most of Spark’s environmental documentation, and the requirements of selected EPRs (see Figure 4).

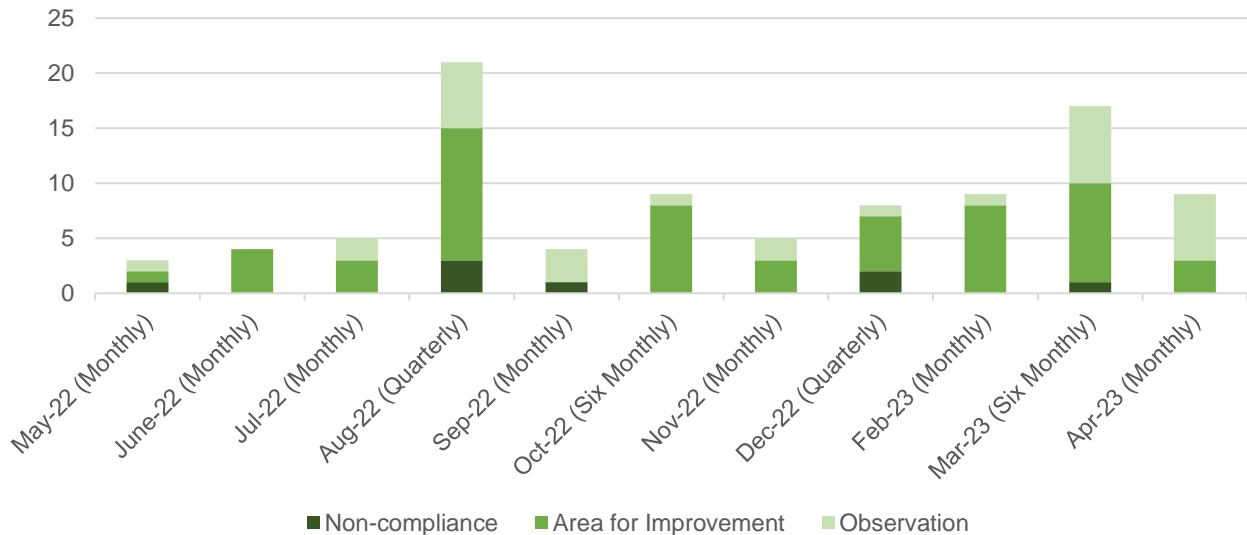


Figure 4: Audit findings by type and audit date (Project commencement to April 2023)

Spark D&C established corrective actions to address the audit findings. Thirty-eight (38) findings were closed during the reporting period. Forty-one (41) findings remained open at the end of the reporting period. (See Figure 5).

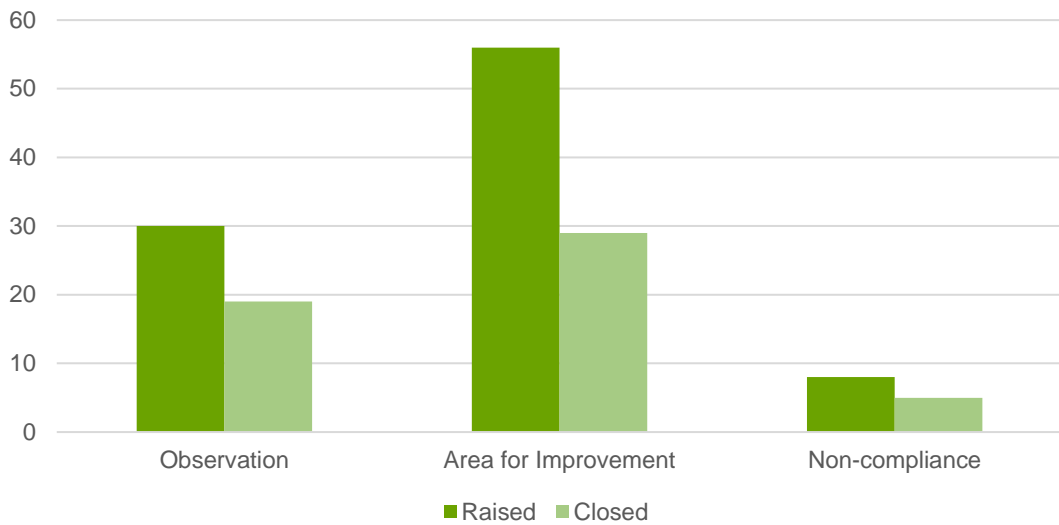


Figure 5: Cumulative audit findings raised and closed - Project commencement to April 2023

4.3 Compliance with the Incorporated Document

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

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

4.4 Compliance with Environmental Performance Requirements

All the sixty-six (66) planned and applicable EPRs as agreed with NELP and Project Co were audited for the period. This represents over half of the applicable EPRs. At least one EPR from 16 of the 17 EPR categories was included in the six-month period, and two EPRs were audited more than once.

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

Six findings were raised against the requirements of the EPRs; one Non-compliance, three Areas for Improvement, and two Observations. The Non-compliance related to the inability of Spark to demonstrate implementation of the Spoil Management Plan. The remaining EPR-related findings were raised against design and process requirements (see Table 4). In general, the findings are related to documented environmental management arrangements and do not represent a material risk to the environment.

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



Table 4: Summary of EPR audit findings November 2022 - April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	0	1	0	1
Afl	0	3	0	3
O	0	2	0	2
Total	0	6	0	6

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

Figure 6 shows the distribution of EPRs in each of the categories noting which were audited, and the status of compliance for the reporting period. Two findings were raised against EPR SW8. Only EPRs relevant to the design and construction underway during the reporting period were included in the audit schedule for the period. Further, not all EPRs have equally detailed requirements, and there are different numbers of EPRs in each EPR category. The number of EPRs audited does not directly reflect the relative weight of environmental management requirements.

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

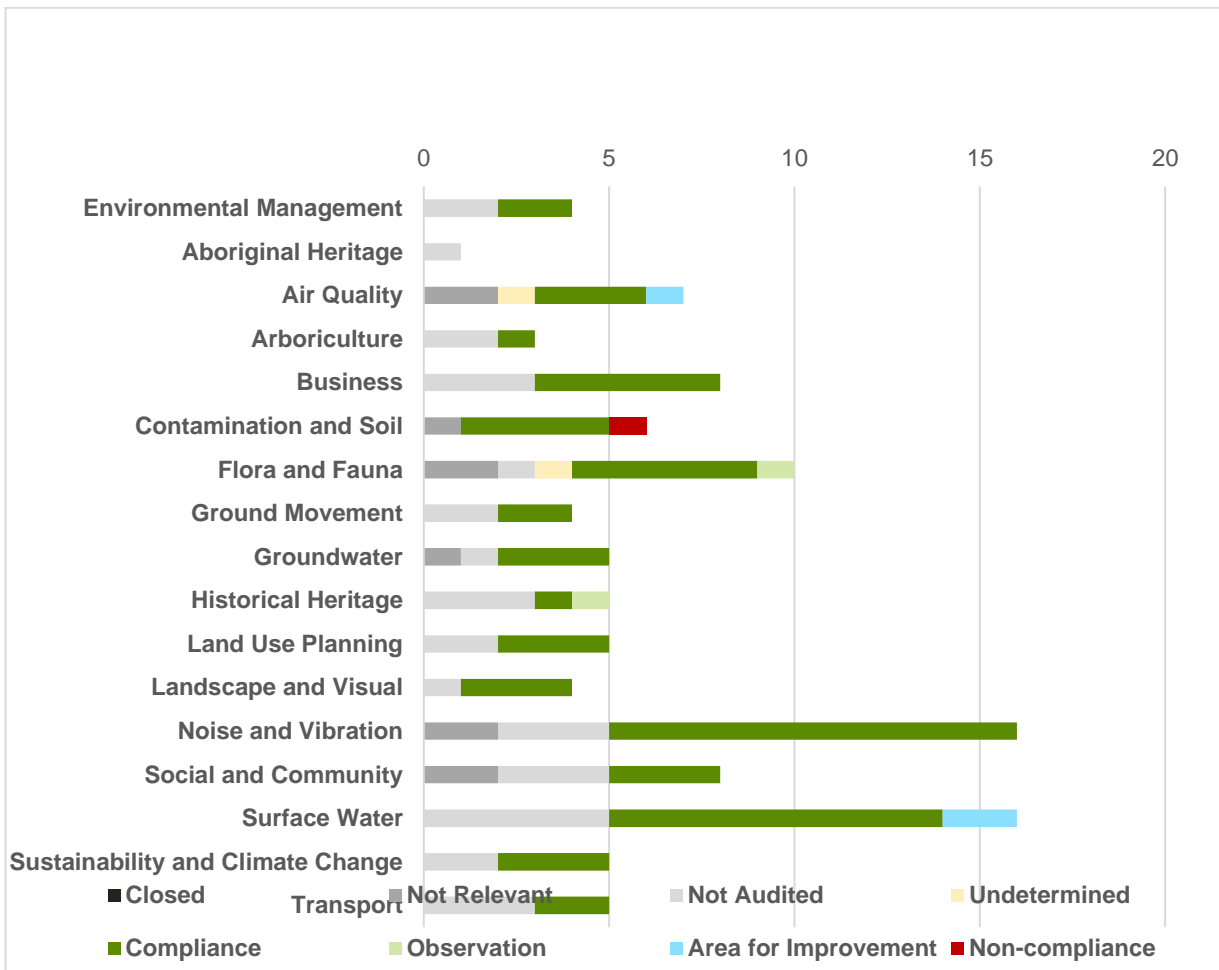


Figure 6: EPR audit findings by EPR category November 2022 – April 2023



4.5 Implementation of the Environmental Strategy

The implementation of the Environmental Strategy was not audited during the reporting period. It was audited in October 2022 and the two previously raised findings remain open.

Table 5: Environment Strategy audit findings November 2022 – April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	0	0	0	0
Afl	2	0	0	2
O	0	0	0	0
Total	2	0	0	2

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

4.6 Implementation of the Construction Environmental Management Plan

An audit of the selected key elements of the CEMP was conducted in December 2022, and an audit of all applicable elements was conducted in March 2023. Five new audit findings were raised comprising three (3) Areas for Improvement, and two (2) Observations. The findings were process related.

In general, the findings are related to documented environmental management arrangements and do not represent a material risk to the environment. A summary of the audit findings is given below.

Table 6: CEMP audit findings November 2022 – April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	3	0	1	2
Afl	8	3	4	7
O	2	2	2	2
Total	13	5	7	11

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

Seven previous audit findings were closed; one Non-compliance, four Areas for Improvement, and two Observations.

4.7 Implementation of the Worksite Environmental Management Plans

The WEMPs applicable to the works underway were audited each month during the reporting period. Twenty findings were raised against the requirements of the WEMPs during the reporting period; nine Areas for Improvement, and eleven Observations. The findings were related to inadequate on-site environmental



controls at specific works areas, reflecting increased construction activities, and to process implementation issues. Sixteen previous findings were closed and nine remain open. See Table 7.

Ineffective environmental controls present a localised risk to the environment.

Table 7: WEMP audit findings November 2022 – April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	0	0	0	0
Afl	1	9	7	3
O	4	11	9	6
Total	5	20	16	9

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

4.8 Implementation of Management Plans

Spark has developed Management Plans to address the environmental management requirements for specific environmental aspects, and to meet the requirements of the EPRs. The applicable elements of the Management Plans were audited in December 2022 and March 2023. Sixteen new findings were raised during the reporting period; two Non-compliances, thirteen Areas for Improvement, and one Observation.

The two Non-compliances were raised against the Groundwater Management Plan and the Ground Movement Management Plan as relevant construction activities had commenced without a verified Management Plan in place. The other findings related to Project wide inadequate environmental controls for sediment control and dust management, and to insufficient implementation of documented environmental management arrangements.

Ineffective environmental controls present a risk of damage to the environment.

Table 8: Management Plans findings November 2022 – April 2023

Finding Type	Open at start of Nov 2022 - Apr 2023 Period	Raised during Nov 2022 - Apr 2023 Period	Closed during Nov 2022 - Apr 2023 Period	Open at end of Nov 2022 - Apr 2023 Period
N	1	2	3	0
Afl	10	13	11	12
O	0	1	0	1
Total	11	16	14	13

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

4.9 Implementation of Construction Compound Plans

Four of the Construction Compound Plans approved by the Minister were audited in the reporting period. One Observation was raised during a site audit against the requirements of one of the approved CCPs relating to rainwater tanks not being installed as defined in the CCP.

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



5 Audit conclusions

5.1 Compliance with Plans required in the Incorporated Document

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

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

5.2 Compliance with Environmental Performance Requirements

All the sixty-six (66) planned and applicable EPRs as agreed with NELP and Project Co were audited for the period. The findings show that Spark needs to focus on demonstrating appropriate spoil management, and on procedural matters.

5.3 Implementation of the Environmental Strategy

Key elements from the Environmental Strategy were audited in October 2022 during the previous six month reporting period. The two audit findings raised reflect that the relationship between Spark Project Co and Spark D&C is in development and not all processes have been implemented as required. These findings remain open.

5.4 Implementation of the Construction Environmental Management Plan

The CEMP is the main overarching document which outlines the processes and systems to manage Spark D&C's environmental aspects. The CEMP has been documented to meet the requirements from ISO14001. CEMP-related audit findings show that Spark's environmental management system is progressing and that the documented environmental management arrangements are progressively reflecting actual environmental management practices.

5.5 Compliance with the requirements of the Worksite Environmental Management Plans

The WEMPs have been established to meet the requirements on the EMF and the PSDR. However, they are complex documents for managing site environmental management. A range of audit findings have been raised relevant to on-ground environmental management and implementation of environmental controls. The issues highlighted by these findings present a potential risk to the local environment.



5.6 Compliance with the requirements of the Management Plans

The EMF requires the development and implementation of specific Management Plans. Spark has developed all the plans required for the scope of work undertaken during the reporting period. The audits found that there were some issues with on-site environmental management, and process issues including monitoring and implementation of site-based controls. The findings against the Management Plans reflect package wide environmental issues, with the potential for environmental harm.

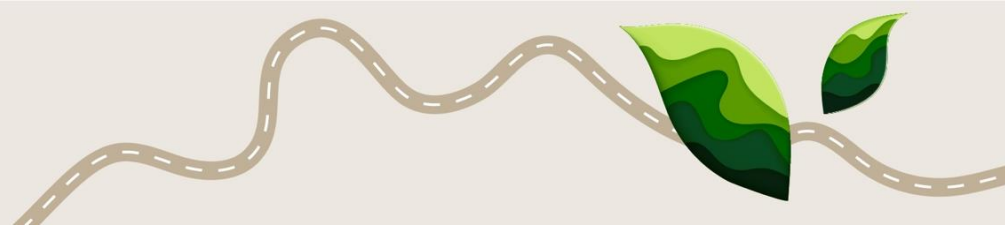
5.7 Compliance with the requirements of the Construction Compound Plans

The development of Construction Compound Plans (CCPs) to the satisfaction of the Minister for Planning is required by the Incorporated Document. The one new audit finding raised against the requirements of the approved CCPs is not considered material.



Appendix 1 – EPRs audited in the reporting period

Audit date		EPRs audited
December 2022	Environmental Management Framework (EMF)	EMF3, EMF4
	Air Quality (AQ)	AQ2, AQ3, AQ6
	Business (B)	B4, B7, B8
	Contamination and soil (CL)	CL4, CL5
	Flora and Fauna (FF)	FF1, FF2, FF3, FF4, FF9
	Ground Movement (GM)	GM2 (for piling activities only)
	Groundwater (GW)	GW2, GW3, GW4
	Land Use Planning (LP)	LP2, LP3, LP5
	Landscape and Visual (LV)	LV1, LV2
	Noise and Vibration (NV)	NV13, NV14
	Social and Community (SC)	SC1, SC2, SC4
Surface Water (SW)	SW1, SW4, SW8, SW9, SW10, SW12	
March 2023	Air quality (AQ)	AQ1, AQ6
	Arboriculture	AR3
	Business (B)	B3, B5
	Contamination and soil (CL)	CL1, CL2, CL3, CL4
	Flora and fauna (FF)	FF6, FF8
	Ground Movement (GM)	GM4
	Historical Heritage (HH)	HH1, HH4
	Landscape and Visual (LV)	LV4
	Noise and Vibration (NV)	NV1, NV3, NV6, NV8, NV9, NV10, NV11, NV12, NV15
	Surface Water (SW)	SW3, SW6, SW11, SW14, SW15
	Sustainability and Climate Change (SCC)	SCC3, SCC4, SCC5
	Traffic and Transport (TT)	T1, T4



Appendix 2 – Audit findings and summary of actions taken

Audit Findings Raised During the Reporting Period

Table 9: Summary of audit findings against the Environmental Strategy

No new findings were raised against the Environment Strategy during the reporting period, as the Environmental Strategy was not included in the scope of audit conducted in the reporting period.

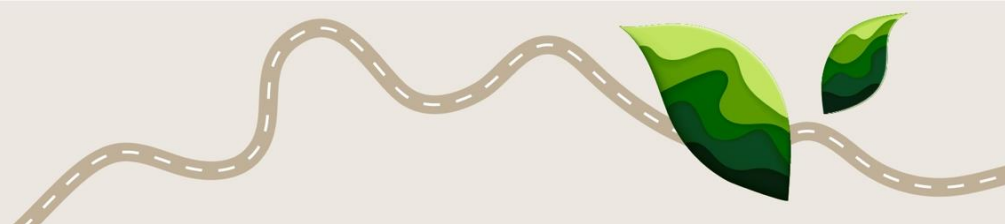
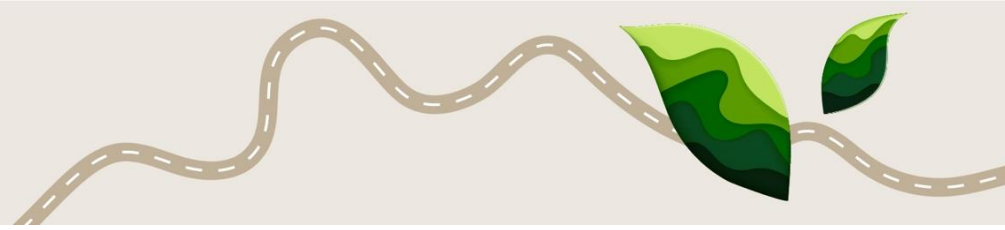


Table 10: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Dec-22	IEA-1222-01	Afl	EPR AQ6: Contract arrangements with for haulage vehicle fleet contractors have not included the incentives for them to comply with Euro V European emission standards.	Spark was initiating a process through the procurement system. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Dec-22	IEA-1222-02	Afl	EPR SW8: It is unclear whether flow modelling for modifications to surface drainage along the northern central package alignment has accounted for drainage blockages and flow restrictions in existing drains on Greensborough Road.	The Spark D&C Environment Team was working with the Design Team to address this finding. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Dec-22	IEA-1222-03	Afl	EPR SW8: Not all relevant design packages with waterway modifications have adequately addressed the requirements of EPR SW8.2	The Spark D&C Environment Team was working with the Design Team to address this finding. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Mar-23	IEA-0323-01	N	EPR CL1: Full implementation of Spoil Management Plan could not be demonstrated at time of audit.	Spark D&C has raised corrective actions to ensure roles and responsibilities are clear and appropriately exercised. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Mar-23	IEA-0323-02	O	EPR FF8: Mitigation measures to minimise noise and vibration impacts on Australian Grayling are not clearly documented within Sparks management systems. It is noted that impacts are largely avoided by the current design and location of works however this is not clearly captured. Selection of work methods, avoiding activities that may generate intense noise and vibration, with respect to FF8 are not clearly documented.	Spark D&C is seeking specialist advice on any potential impacts of the works to the Australian Grayling. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Mar-23	IEA-0323-03	O	EPR HH4 Undertake archival photographic recording: No evidence to demonstrate that the photographic records taken of the River Red Gum tree 8017 have been taken to the satisfaction of Heritage Victoria	Spark D&C is seeking specialist advice on the requirements for archival photographs. This was not fully implemented in the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

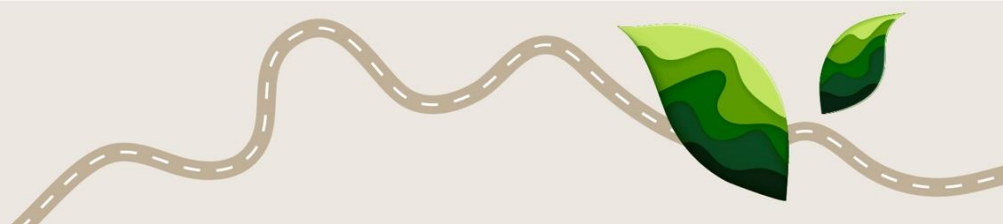
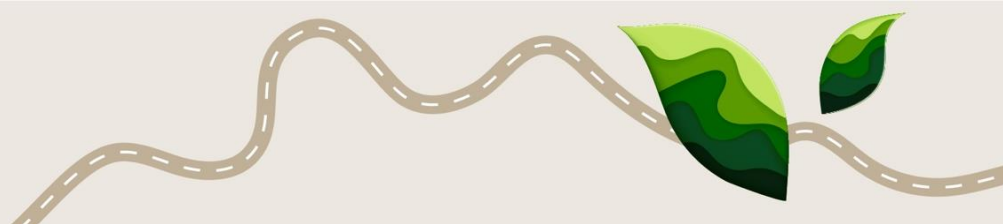


Table 11 Summary of findings against the CEMP

Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Dec-22	IEA-1222-04	Afl	CEMP 6.5 Environment in Design: Not all permanent design packages with EPR requirements are reviewed by the Environment Team as per Spark D&C Design Management Plan.	Spark developed and implemented a process to ensure environmental input into design review of permanent design packages. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Feb-23	IEA-0223-04	Afl	CEMP 9.5.1 Corrective and Preventive Actions: Process for recording and tracking site based actions (from weekly inspections or other actions) not consistently applied in Synergy.	Spark improved the implementation of the process for recording and tracking actions. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-23
Mar-23	IEA-0323-04	Afl	CEMP 4.1 Compliance Requirements: The methodology for rating obligations including Conformance, Partial Conformance, Non-Conformance or Not Applicable, is not clearly defined or applied.	Definitions for rating obligations including Conformance, Partial Conformance, Non-Conformance or Not Applicable were established and included in the Obligations register. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Apr-23
Mar-23	IEA-0323-05	O	CEMP 4.1 Compliance Requirements: The term "No reportable impact events" in relation to the environmental	Definitions for "No reportable impact events" are included in the Obligations Register.	Closed	Apr-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			objectives and targets for noise, vibration and air quality, tracked in the obligations register is unclear and not defined.	This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Mar-23	IEA-0323-06	O	CEMP 9.1 Internal audits: The draft audit schedule does not define or apply a risk-based approach for audits of suppliers and subcontractors.	Spark has updated the internal audit schedule. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

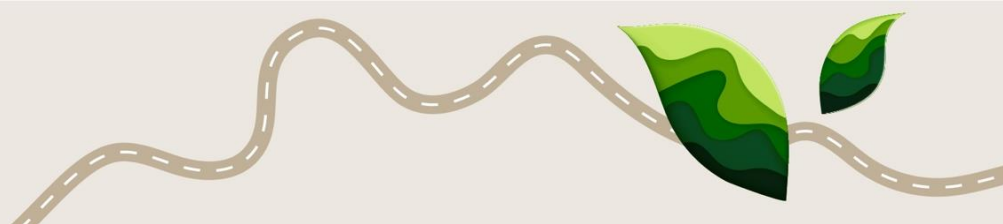
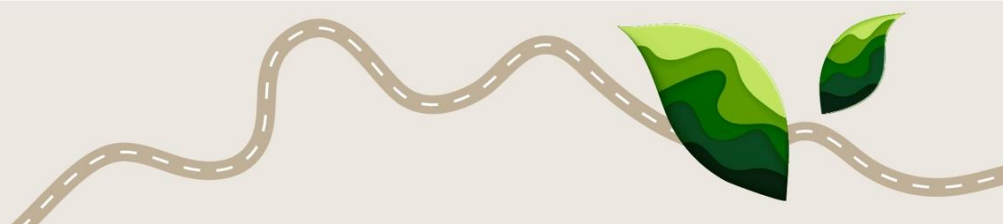
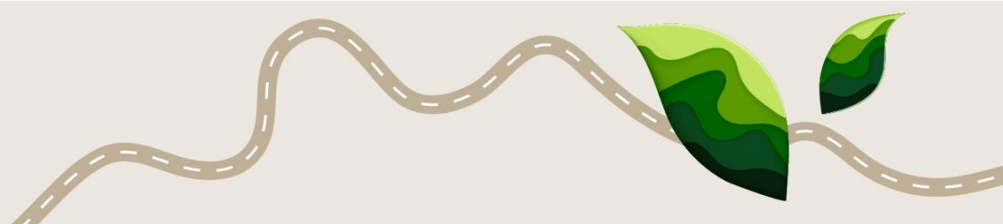


Table 12: Findings raised against the WEMPs

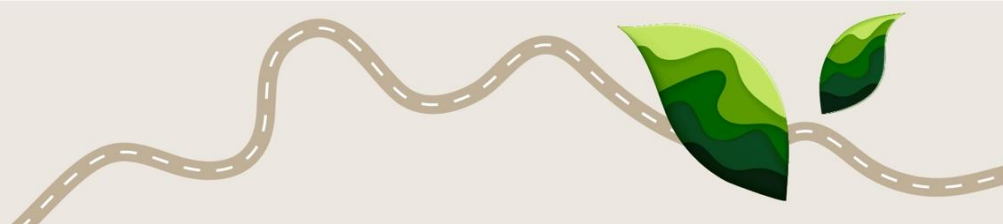
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Nov-22	IEA-1122-01	O	WEMP-0019 9.2 Air Quality: Nuisance dust observed at Watsonia Box.	Spark implemented appropriate dust management practices. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Dec-22
Nov-22	IEA-1122-02	Afl	WEMP-0019 9.13 Noise and Vibration: There has been no traffic noise monitoring conducted or planned on the recently opened Greensborough Road diversion.	Spark undertook traffic noise monitoring as specified in the WEMP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-23
Nov-22	IEA-1122-04	O	WEMP-0020 10 Monitoring and Compliance: Weekly site inspections have not commenced at Winsor Reserve.	Spark commenced weekly inspections at Winsor Reserve. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Dec-22
Nov-22	IEA-1122-05	Afl	WEMP-0029 1 Introduction: Work at the BIZ had commenced before the SEP was communicated and available on site.	Spark conducted a toolbox talk for the SEP and the SEP is available on site. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-22
Dec-22	IEA-1222-08	O	WEMP-19 Watsonia Northern to Yallambie 9.12 Noise and Vibration: There was no recorded action for the tonal alarm captured by	Spark has recorded this event. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-23



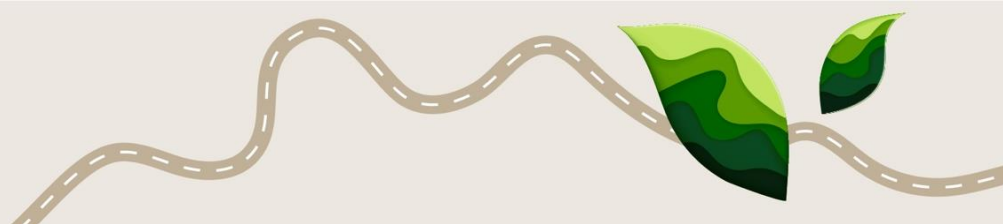
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			SiteHive for a concrete mixer truck at Watsonia Box.			
Feb-23	IEA-0223-01	Afl	<p>WEMP-0018 10.7 Contamination of soil: Controls to manage muds and chemicals at the Bulleen Rd geotechnical site investigation microsite were not fully implemented or effective:</p> <ul style="list-style-type: none"> • Bund capacity was exceeded • A jerry can was stored outside of the bunded storage. • Drill fluids were dripping from hoses attached to the rig and migrating beyond protective ground matting. 	<p>Geotechnical investigation at micro-sites implemented appropriate controls.</p> <p>This finding related to on site environmental controls and represented a low risk to the environment.</p>	Closed	Mar-23
Feb-23	IEA-0223-05	Afl	<p>WEMP-0021 9.3 Aboriculture: Management of trees for protection at Winsor Reserve (Somers Ave) were not fully effective:</p> <ul style="list-style-type: none"> • Crew pruning the trees had not signed onto the permit. • Following damage to a tree, pruning occurred without arborists' assessment or supervision. • Contact between trees and hoarding noting that the arborists report has not been finalised. 	<p>Spark implemented measures to ensure permits were signed on to by relevant works personnel.</p> <p>This finding related to on site environmental controls and represented a medium risk to the environment.</p>	Closed	Mar-23
Feb-23	IEA-0223-07	Afl	<p>WEMP 0026 7.0 Approvals: Installation of the additional crib huts, ablution and generator installation underway prior to obtaining approval.</p>	<p>Approval for the revised Bulleen Cut & Cover CCP was obtained from the Minster for Planning.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Closed	Mar-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Feb-23	IEA-0223-08	O	WEMP-0026 9.2 Air Quality: The location of the SiteHive dust and noise monitor (Trinity North HEX-000069) was not ideal for detecting representative dust or noise levels, and not as per the location on the SEP	Spark moved the dust monitor to an appropriate location and this has been noted on the SEP. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Mar-23
Feb-23	IEA-0223-09	Afl	WEMP-0026 9.14 Surface Water: Water quality data and data analysis to support the Trinity Lake dewatering did not set clear criteria to cease the dewatering activity.	Spark continues to monitor water quality upstream and downstream of the lake and the data are analysed. Spark D&C will establish a new dewatering permit for the next phase with water to be handled as construction water for treatment to meet discharge quality guidelines. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Mar-23
Mar-23	IEA-0323-16	O	WEMP-26 9.12 Noise and Vibration: Observed a tonal beeper on reversing truck delivering clean fill material at Trinity North.	No tonal alarms were observed during subsequent site visits. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Apr-23
Apr-23	IEA-0423-01	O	WEMP 19 Northern to Yallambie 9.13 Social and Community: Section 9.10 - Complaint received during OOHW Breach was not actioned as per the CCEMP. Complaint was not forwarded to site team at night; therefore no action was taken to rectify the noise.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Apr-23	IEA-0423-02	Afl	WEMP 19 Northern to Yallambie 9.5 Contamination and Soil: Multiple spoil trucks observed leaving site with uncovered loads. Trucks were exiting with fully open tarps on both truck and trailer, or partially covered loads.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a low risk to the environment.	Open	
Apr-23	IEA-0423-03	O	WEMP 23 Blamey to Drysdale 9.3 Arboriculture: Specific actions raised from Arborist Report for managing potential tree impacts are not formally captured in Spark's system. Documentation (WEMP) requires update to include recommended controls, including monitoring for two years post impact, watering, and change to construction methodology.	Actions to address this finding have not been formally implemented. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Apr-23	IEA-0423-04	Afl	WEMP 26 Bulleen Cut & Cover 9.5 Contamination and Soil: Evidence of a diesel spill observed near the generator for the temporary crib huts at Bulleen Cut and Cover had not been reported or cleaned. Further there was no spill kit observed near the generator.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a low risk to the environment.	Open	
Apr-23	IEA-0423-05	O	WEMP-26 Bulleen Cut & Cover 9.2 Air Quality: Nuisance dust observed leaving the Bulleen Cut and Cover works area.	Actions to address this finding have not been formally implemented. This finding related to on site environmental controls and represented a low risk to the environment.	Open	



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Apr-23	IEA-0423-06	O	WEMP 27 Bulleen SRD 9.5 Contamination and Soil: Hazardous chemicals were observed stored outside the designated bunded areas at Bulleen SRD.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a low risk to the environment.</p>	Open	
Apr-23	IEA-0423-07	O	WEMP 27 Bulleen SRD 9.6 Flora and Fauna: A fauna relocation at Carey was not included in the relocation register.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Apr-23	IEA-0423-08	Afl	WEMP 29 Manningham Demolition 9.14 Surface Water: An unprotected stormwater drain at Greenaway Street (north of Manningham Rd) was impacted by sediment and debris associated with the nearby demolition works.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a medium risk to the environment.</p>	Open	
Apr-23	IEA-0423-09	O	WEMP 26 Bulleen Cut and Cover 10 Monitoring and Compliance: Not all observations made during inspections that require follow-up actions are being recorded in Synergy.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	

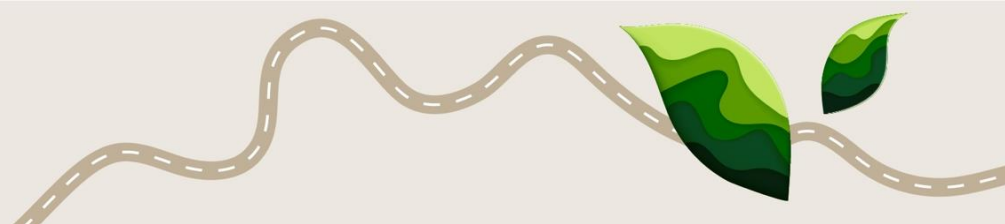
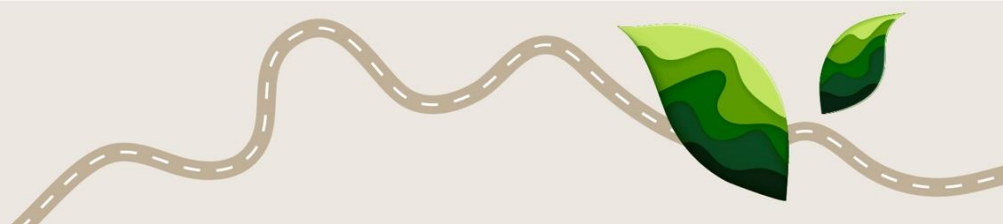
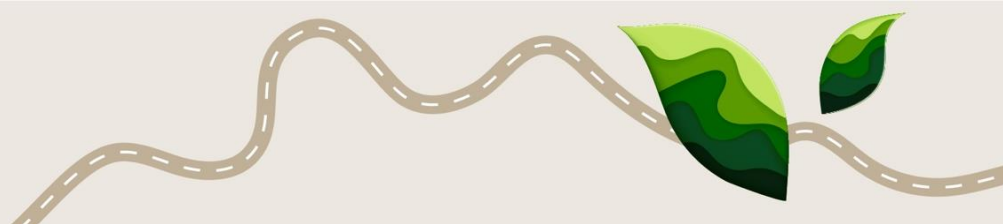


Table 13: Findings raised against the Management Plans

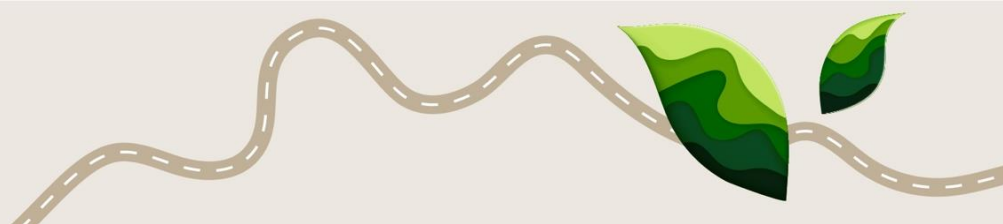
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Nov-22	IEA-1122-03	Afl	Surface Water Management Plan 6.3.3.2 ERSED Control – Best Management: Sediment observed on public roads from mud tracking and run off.	Spark implemented appropriate sediment control measures. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Feb-23
Dec-22	IEA-1222-05	N	Ground Movement Management Plan (GMMP): Construction of diaphragm walls (D-walls) has commenced without a GMMP verified by the IEA and accepted by NELP for these activities.	The GMMP was verified by the IEA and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-23
Dec-22	IEA-1222-06	N	Groundwater Management Plan (GWMP): Construction of diaphragm walls (D-walls) has commenced without a GWMP verified by the IEA and accepted by NELP for these activities.	The GWMP was verified by the IEA and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-23
Dec-22	IEA-1222-07	Afl	Surface Water Management Plan (SWMP) 6.3.3.1 – Wastewater management – Dewatering Permits: The dewatering process is not fully implemented as described in the SWMP. This includes: <ul style="list-style-type: none"> • Discharge pumping status not recorded (e.g. Permit 19 at Trinity) • Water quality monitoring and measurements during discharge to demonstrate compliance with permitted 	Spark implemented a revised process for conducting and recording dewatering events. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Mar-23



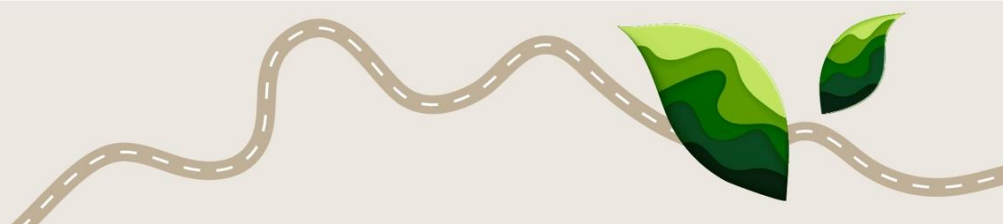
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			limits not being undertaken (e.g. Permit 13 at Lower Plenty)			
Feb-23	IEA-0223-02	Afl	Dust and Air Quality Management and Monitoring Plan 7.1 Controls for Dust Emissions: Dust was observed on Greensborough Road and leaving sites in the north and south.	Spark implemented appropriate dust management practices. This finding related to on site environmental controls and represented a low risk to the environment	Closed	Mar-23
Feb-23	IEA-0223-03	Afl	Construction Noise and Vibration Management Plan 7.2 Controls for Unavoidable Works During Night-time: Attended noise monitoring during unavoidable OOH works not always conducted as per the Gatewave requirements across the project.	Actions to address this finding have been identified by Spark D&C but not been fully implemented. This finding related to on site environmental controls and represented a medium risk to the environment	Open	
Feb-23	IEA-0223-06	Afl	Surface Water Management Plan 6.3.3.2 ERSED Control – Best Management: ERSED controls not in fully installed or effective: <ul style="list-style-type: none"> • Trinity South - Trucks departing Trinity South bypassing rumble grid • BIZ – Sediment control along western boundary with the nursery not in place • Manningham – Sediment & erosion controls on southern bank of filled area not all in place or effective. • Manningham – Silt log on drains behind 	Spark implement appropriate sediment and erosion control practices. This finding related to on site environmental controls and represented a low risk to the environment	Closed	Apr-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			CCP (on Bulleen Rd side) requires replacement.			
Mar-23	IEA-0323-07	Afl	CCEMP 7 Evaluation and Monitoring: Monitoring and reporting of key performance indicators to demonstrate effectiveness of community consultation and engagement methods and targets are not fully implemented.	Spark has revised the process for evaluating and reporting of community consultation and engagement key performance indicators. Spark has updated and documented this process in a revised version of the CCEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Mar-23	IEA-0323-08	Afl	CNVMP 4.2 Construction Noise and Vibration Impact Assessments: Update to CNVMP required to accurately describe the processes including: <ul style="list-style-type: none"> • Validation of background noise data • Attended monitoring requirements • CNVIA process for managing recommendation • Process to confirm effectiveness of controls. 	Spark has revised the process for CNVIAs. Spark has updated and documented this process in a revised version of the CNVMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Mar-23	IEA-0323-09	Afl	DAQMMP 5.3.1 Construction Air Quality Impacts: Given the location of the dust monitors, the 190µg/m3 1-hour PM10 trigger level would not appropriately reflect the impacts to sensitive receivers if	Spark has updated the 1-hour PM10 alert levels in SiteHive. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Apr-23



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			<p>activated. Advised by Spark environmental manager that dust monitors have been moved to better represent sensitive receptor dust monitoring. As a result of the new locations the intervention trigger level of 190ug/m3 is no longer applicable and Spark is in the process of updating the trigger level to 80ug/m3 which is linked to the 24/hr target and will allow earlier intervention for dust generating activities. This new alert limit has not been activated in SiteHive, therefore the dust monitors in their new location are not providing alerts for potential dust generation in accordance with the DAQMP.</p>			
Mar-23	IEA-0323-10	O	<p>EcMP 9.1.1 Pre-construction site surveys: TPZ inspection reports completed by external consultants are raising actions that are not being captured or tracked via Synergy in the South. For example, signage required at TPZ not raised as an action by Spark in the management system, therefore it could not be determined if the action had been closed at the time of the audit.</p>	<p>Actions to address this finding have not been formally implemented. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Mar-23	IEA-0323-11	Afl	<p>IS Rating Plan 3.1.3 Credits progressed: Lea-1: Contribution to the UN SDGs was not identified in public reporting. It is not clear if reporting is independently reviewed.</p>	<p>Actions to address this finding have not been formally implemented.</p>	Open	



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
				This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Mar-23	IEA-0323-12	Afl	IS Rating Plan 3.1.3 Credits progressed Rso-4: The use of recycled materials has not yet been specified and is accordingly not being tracked.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Mar-23	IEA-0323-13	Afl	IS Rating Plan 3.1.3 Credits progressed Rso-6: The design baseline for materials has not yet been defined.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Mar-23	IEA-0323-14	Afl	IS Rating Plan 3.1.3 Credits progressed. Wat-1: Water consumption and savings data are not clearly quantified.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Mar-23	IEA-0323-15	Afl	TMP 3.16.7 Parking Management: The defined off-site parking for the construction workforce with a shuttle bus to works areas has not been implemented. On-site parking is a work in progress. It is noted that there have been a number of complaints from residents about project parking in nearby streets.	<p>Actions to address this finding have not been formally implemented.</p> <p>This finding related to on site environmental controls and represented a low risk to the environment.</p>	Open	

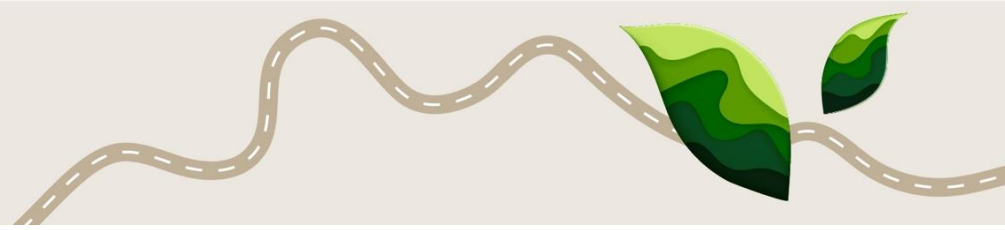


Table 14 Findings raised against the CCPs

Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Mar-23	IEA-0323-17	O	CCP-0010 4 Management of environmental sensitivities: Rainwater tanks to harvest rainwater on the main part of the Manningham Structure and M&E compound (north of Ilma Crt) have not been installed.	Rainwater tanks were being progressively installed. This finding related to on site environmental controls and represented a low risk to the environment	Closed	Apr-23

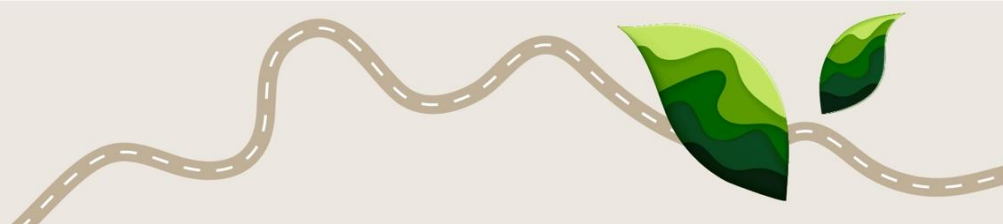
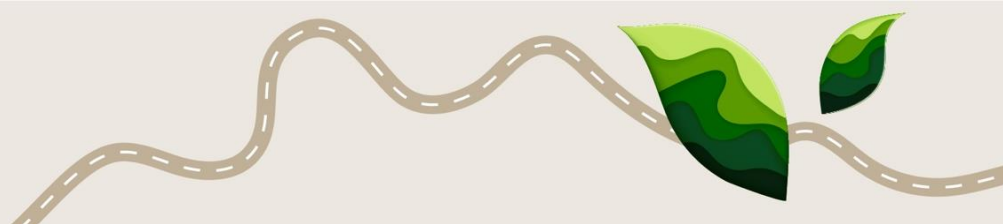
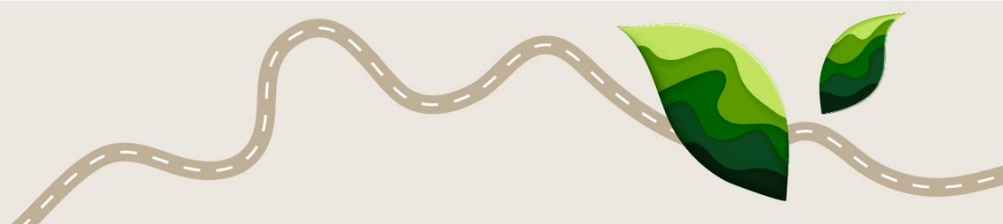


Table 15 Previous open audit findings

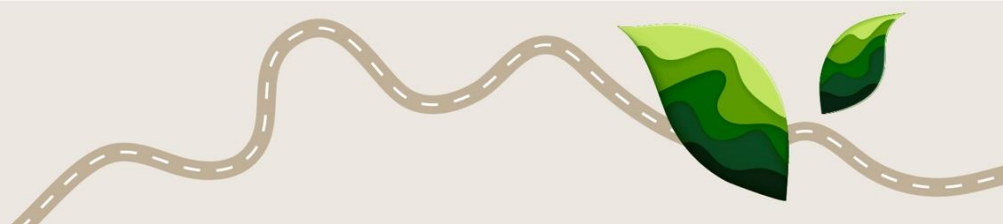
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Jun-22	IEA-0622-03	Afl	WEMP 8.8 Sustainability and Climate Change –System to implement the sustainability objectives and for tracking sustainability performance are not established.	Spark has developed and implemented systems for the collection and tracking of fuel, water, and other data for sustainability reporting. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Nov-22
Aug-22	IEA-0822-01	N	CEMP 4.1 Compliance requirements: A framework for managing obligations and for obtaining approvals is in place. However, processes for identifying, tracking, and evaluating compliance with these obligations are not fully implemented.	Spark has revised the approach to maintaining the Obligations register and to evaluating and reporting on compliance. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Dec-22
Aug-22	IEA-0822-02	Afl	CEMP 4.5.2 Package Management Procedures: Cited WeBuild procedures are not customised for Spark’s scope of work.	Spark has revised relevant procedures to be in Spark format and be relevant to Spark’s environmental management arrangements. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-23
Aug-22	IEA-0822-03	Afl	CEMP 5.2 Key Risk Objectives and Targets: The objectives and targets are not quantitative or measurable, and tracking progress towards meeting these is not in place.	Spark has developed revised objective and targets which align with the objectives in the Environmental Strategy and the Sustainability MP. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	



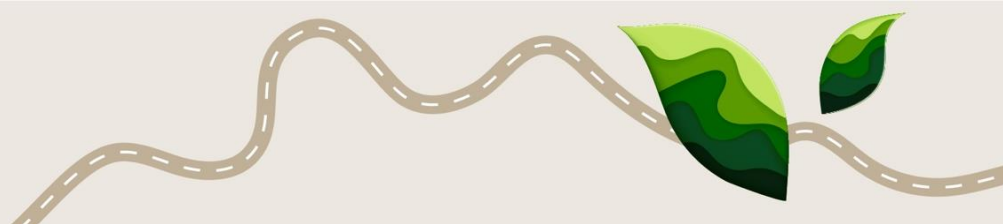
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Aug-22	IEA-0822-04	N	CEMP 5.5 Project Plans Not all management processes and requirements specified in the CEMP, sub-plans, or other EPR plans including the Sustainability MP, CCEMP and TrMP, have been implemented as described.	Spark has progressively updated and revised Management Plans. These are being reviewed by the IEA for compliance, and by NELP for acceptance. Not all relevant Plans have been updated. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Aug-22	IEA-0822-05	N	CEMP 5.5.2. Worksite environmental management plans: Controls identified in SEPs are not consistent or always aligned with WEMPs and Sub Plans.	Spark has revised and updated Site Environmental Plans to include key environmental controls and align with controls defined in the WEMPs. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	May-23
Aug-22	IEA-0822-07	Afl	CEMP 8. Environmental training and awareness. While good progress has been made, not all the training defined in the CEMP and CEMP Sub Plans is being delivered.	Spark has developed revised training needs. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Aug-22	IEA-0822-08	Afl	CEMP 9.1. Monitoring. Monitoring requirements in the CEMP, Sub Plans, and WEMPs are not being managed and conducted as defined.	Spark has documented monitoring to reflect project environmental monitoring requirements. Spark has updated and documented this process in the Environmental Monitoring and Management Plan which requires verification by the IEA and acceptance by NELP at the end of the reporting period.	Open	



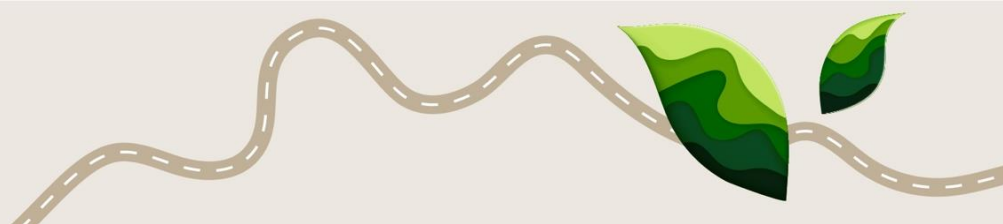
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
				This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.		
Aug-22	IEA-0822-09	Afl	CEMP 9.1.2 Environmental Site Inspections: The weekly inspections process is not fully established and not all inspections checklists were completed effectively.	Spark has revised the weekly site environmental inspection process and action records. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Closed	Nov-22
Aug-22	IEA-0822-10	Afl	CEMP 9.3.1 Internal environmental audits: Internal audits have not commenced for management plans that have been issued for use. PSDR Part F1 1.11 requires internal audits to commence from financial close.	Spark has developed an internal audit schedule and commenced undertaking audits. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Aug-22	IEA-0822-11	O	CEMP 10.3.3.1 Immediate reporting [incidents]. Incident notification requirements in the EMF are not documented in the CEMP. No agreement with the State on formal incident reporting is documented.	Spark has included the requirements for immediate reporting of incidents in a revised CEMP. Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	
Aug-22	IEA-0822-12	O	CEMP 12 Document Control: Documents continue to have quality control issues and require minor editorial amendments.	Spark has addressed the document controls and quality matters.	Closed	Dec-22



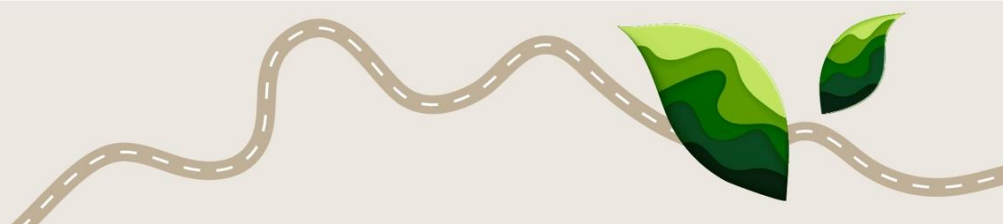
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
				This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.		
Aug-22	IEA-0822-15	Afl	CNVMP 5.5 Construction activities: The noise barrier on the west side of Greensborough Road adjacent to Powley Parade was removed before applicable new or temporary noise barriers (including noise walls) or other noise attenuation devices was commissioned (PSDR Part F6 s3(d)).	Spark has reached agreement with affected stakeholders for noise mitigation measures. Installation of these mitigation measures is progressing. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	May-23
Aug-22	IEA-0822-16	Afl	CNVMP 6.6.2 Permit to Work Out of Hours: The IEA approval timeline and the notification timeline for unavoidable OOH permits has not always met the procedure described in the CNVMP and associated procedures.	The OOH permit form and the process flow have been revised in the draft CNVMP. Spark has updated and documented this process in a revised version of the CNVMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.	Open	
Aug-22	IEA-0822-17	Afl	CNVMP Section 7 CN08: Noise hoarding was not installed prior to commencement of vegetation clearing and grubbing construction works at Northern to Yallambie as required in the associated WEMPs. The specified height of the noise hoarding height in the Northern to Yallambie SEP was only 2.4 m instead of the 3 metres specified by the associated WEMP and CNVIA.	Spark has progressively installed noise hoarding, and this is almost complete with only some minor uncompleted sections remaining. This finding related to on site environmental controls and represented a medium risk to the environment.	Open	



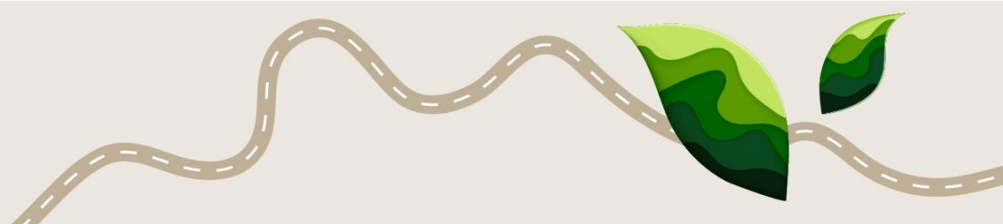
Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
Aug-22	IEA-0822-18	Afl	Flood Emergency MP 7 Environmental Control CFE07: The SEPs do not include flood response and mitigation measures for works in flood impacted areas.	Spark has progressively updated the relevant SEPs to include flood response and mitigation measures. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Dec-22
Aug-22	IEA-0822-19	Afl	Spoil MP 10.1.1 Inspections: Spoil specific control measures are not included in weekly inspection checklist.	Spark has updated the inspection checklist to include the updates to the waste/Spoil section. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-23
Aug-22	IEA-0822-20	Afl	SWMP 7.1 Water quality risk and controls CSW25: Not all measures were implemented or effective to protect receiving waterways from sediment laden run off or local erosion.	Spark has updated and implemented Erosion Control and Sediment management plans. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Dec-22
Sep-22	IEA-0922-01	O	WEMP0018 Site Investigations - 8.7 Contamination of soil: The pop-up bund in the site investigations Manningham micro site was filled with containers that exceeded the bund containment capacity.	Spark is using additional portable bunds at site investigation micro-sites. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Nov-22
Sep-22	IEA-0922-02	N	Dust and Air Quality Management and Monitoring Plan. 7.1 Controls for Dust Emissions; 9.1 Air Quality Monitoring – Construction: Air quality monitoring, management, and reporting was not adequate during the audit period. This includes but is not limited to: • Air quality monitors were not deployed as required and defined for the scope of	Spark has reconfigured limits and alarms in the unattended monitoring system. Incidents are now recorded in Synergy including retrospective alarms. Air monitoring locations for WEMPs have been updated. Air quality is also now reported in the monthly report. This finding related to on site environmental controls and represented a potential high risk to the environment.	Closed	Nov-22



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			<p>construction works during the audit period.</p> <ul style="list-style-type: none"> • Limits, alarms, and alerts were not always configured in the air quality monitoring system. Accordingly, exceedences of PM 2.5 levels were not detected. • Air quality monitoring was not reviewed or reported in August 2022. • Incidents were not recorded for unnoticed exceedences, so no corrective or preventive actions were identified. 			
Sep-22	IEA-0922-03	O	<p>WEMP0019 Watsonia Northern to Yallambie - 9.6 Contamination and Soil: Hazardous chemicals were observed stored outside the designated bunded areas at Watsonia Diversion and Watsonia Box.</p>	<p>Hazardous chemicals were observed to be adequately stored with designated bund areas are being used. This finding related to on site environmental controls and represented a low risk to the environment.</p>	Closed	Nov-22
Sep-22	IEA-0922-04	O	<p>WEMP0025 Manningham - 9.6 Contamination and Soil: Hazardous chemicals were observed stored outside the designated bunded areas.</p>	<p>Hazardous chemicals were observed to be adequately stored in designated bund areas. This finding related to on site environmental controls and represented a low risk to the environment.</p>	Closed	Nov-22
Oct-22	IEA-1022-01	Afl	<p>Environmental Strategy 3.3.2.2 Environmental collaboration across D&C: There is no design environmental compliance report prepared to verify compliance of the relevant design phase as noted in section 3.3.2.2 of the Environmental Strategy.</p>	<p>The Environmental Strategy has been revised. This process requires documenting in a revised version of the Environmental Strategy verified by the IEA and accepted by NELP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/Closed)	Date Closed
Oct-22	IEA-1022-02	Afl	Environmental Strategy 7.1 Management Reviews and Continuous Improvement: A six-monthly management review of the Development Phase management plans as required by the PSDR has not occurred.	<p>The Environment Strategy has been updated.</p> <p>This process requires documenting in a revised version of the Environmental Strategy verified by the IEA and accepted by NELP.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Open	
Oct-22	IEA-1022-03	Afl	CEMP 5.1.1 Environmental Aspects, Activities and Impacts: Environmental opportunities are not identified in the Aspects and Impacts Register, as required by ISO 14001.	<p>Spark has developed the Risk Register to include Opportunities.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Closed	May-23
Oct-22	IEA-1022-04	Afl	CEMP 6.5 Environment in Design: The process for validating integration of EPRs in temporary packages is not formally established.	<p>Spark has revised the CEMP section for Environment in Design has been updated and is currently in review.</p> <p>Spark has updated and documented this process in a revised version of the CEMP which requires verification by the IEA and acceptance by NELP at the end of the reporting period.</p> <p>This finding related to documented environmental management arrangements that unrectified had the potential to present an environmental risk to the project.</p>	Open	
Oct-22	IEA-1022-05	Afl	CEMP 4.3.3 Complaints Management Process: Process for consistent and clear reporting of information about complaints in the monthly report is not yet established.	<p>The Spark monthly report has been revised to include relevant complaints data.</p> <p>This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.</p>	Closed	Dec-22
Oct-22	IEA-1022-06	Afl	Flood MP 6.2.4 Flood Emergency Procedures and Response. Not all flood	<p>Spark has revised the Project emergency action plans, procedures and controls.</p>	Open	



Audit Date	Finding No.	Finding type	Finding	Summary of actions taken by Spark	Status (Open/ Closed)	Date Closed
			planning, preparation and response measures were implemented.	Spark has updated and documented this process in a revised version of the Flood Emergency Management Plan which requires verification by the IEA and acceptance by NELP at the end of the reporting period. This finding related to on site environmental controls and represented a medium risk to the environment.		
Oct-22	IEA-1022-07	Afl	Spoil MP 10.3 Incident Management: Spoil related incidents and events have not been recorded in Synergy and communicated to relevant stakeholders.	Spoil related incidents are included in Synergy (the incident reporting and management database). This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-22
Oct-22	IEA-1022-08	Afl	WASS MP 6.1 WASS Controls: Controls to manage the PASS temporary stockpile at Watsonia vent tunnel were not fully implemented as per the WASS MP.	The PASS stockpile has since been disposed and records maintained. This finding related to on site environmental controls and represented a medium risk to the environment.	Closed	Dec-22
Oct-22	IEA-1022-09	O	WEMP-0026 9.4 Aboriculture: Not all tree protection zones were in place.	Tree protection zones identified during subsequent site visits were observed to be in place. This finding related to on site environmental controls and represented a low risk to the environment.	Closed	Nov-22



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