

North East Link Program – Central Package

IEA Six-Monthly Summary Environmental Compliance Report – November 2025 to April 2026

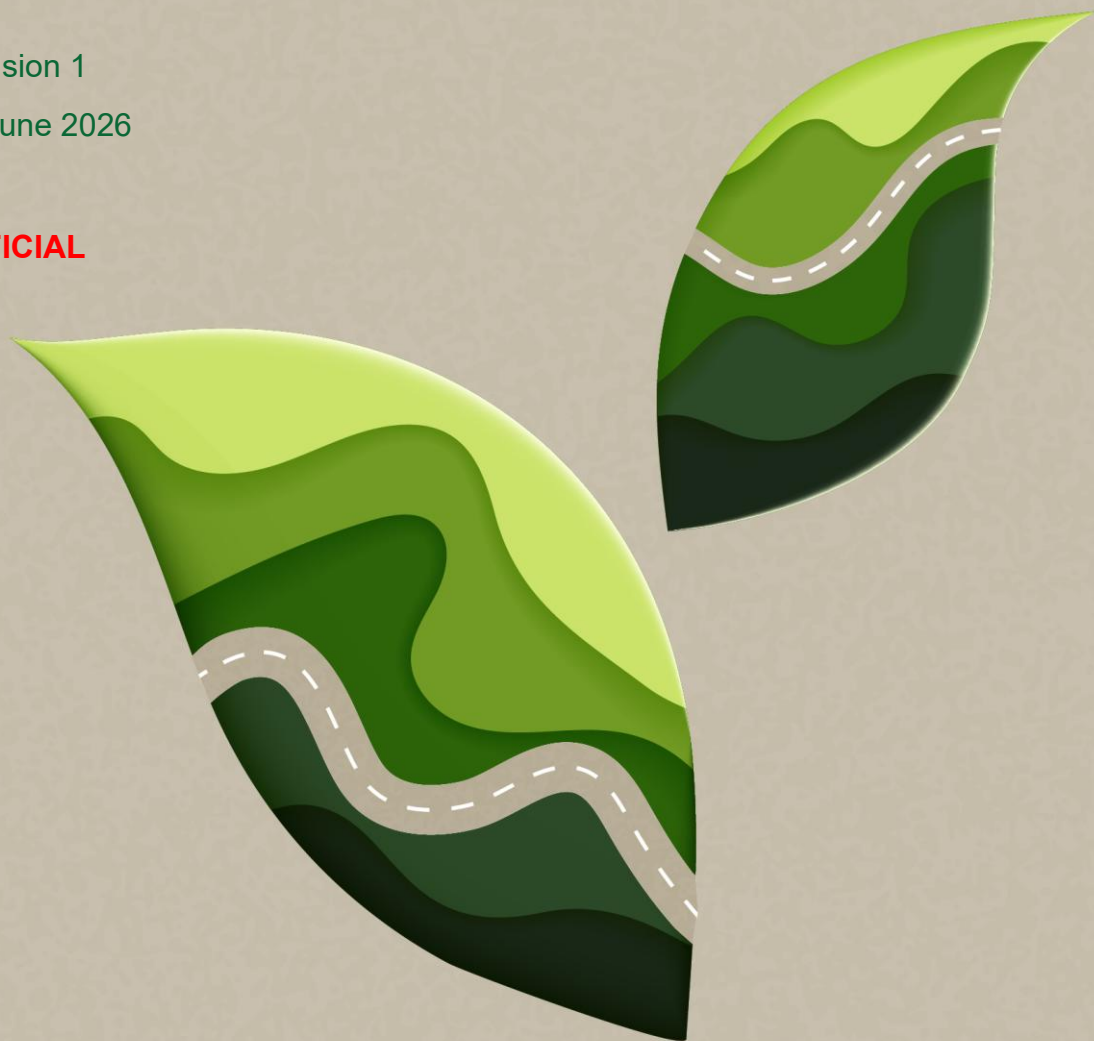
A Report to the Minister for Planning

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OFFICIAL





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Abbreviations

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



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



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



Summary

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

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

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

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

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2025 to April 2026.

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

Five audits were conducted during the audit period as shown in the following table. No audit was conducted in January 2026.

Key Documents	Nov 25 (WEMP)	Dec 25 (Quarterly)	Feb 26 (WEMP)	Mar 26 (Quarterly)	Apr 26 (WEMP)
EPRs (as scheduled)		✓		✓	
Environmental Strategy				✓	
Construction Environmental Management Plan		✓ (selected elements)	✓ (key elements related to the subsidence at AJ Burkitt Oval)	✓ (all applicable elements)	
Management Plans required by the EPRs		✓ (selected plans)		✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)				✓ CCP-004 Lower Plenty (Rev 5)	



The following PSDR clauses were included in the March 2026 audit scope and assessed as compliant:

- Part F1 1.11 Audit, monitoring and verification – Spark internal audits every 3 months
- Part F1 CI 7, table F1.1 – six-monthly reviews of plans
- Part F6, CI 15.3 - annual Sustainability report.

A total of twenty-three (23) audit findings were raised comprising four (4) Non-compliances, eight (8) Areas for Improvement, and eleven (11) Observations. Twenty-nine (29) findings were closed during the reporting period. Six (6) findings remained open at the end of the reporting period.

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	4	4	0
Afl	7	8	12	3
O	5	11	13	3
Total	12	23	29	6

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

The audit findings trends over the last two reporting periods show that Spark’s documented environmental management arrangements have been revised to better reflect actual environmental management processes, and Spark’s implementation of these processes has improved. The number of audit findings against the process documents (CEMP, and Sub-Plans) has decreased compared to the last reporting period. Findings against the WEMPs, which largely manage on ground environmental controls, have remained largely steady but continued to make up over half of the total findings raised.

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

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

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

The IEA has reviewed the required Plans for compliance with the Project environmental requirements separately from the audits.

See below for compliance with the EPRs and the Management Plans.

Compliance with Environmental Performance Requirements

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

Fifty-nine (59) of the EPRs for which Spark is responsible were audited in the reporting period. One (1) finding was raised against the requirements of the EPRs; an Areas for Improvement related to unneeded lighting during the day. One (1) finding was closed, and one (1) finding remained open at the end of the reporting period.



Implementation of the Environmental Strategy

The Environmental Strategy was audited in this reporting period. No previous findings remained open and no new findings raised.

Implementation of the Construction Environmental Management Plan

One (1) new finding was raised against the requirements of the CEMP; an Area for Improvement relating to the management of the subsidence incident at AJ Burkitt Oval.

One (1) finding was closed, and none (0) remained open at the end of the period.

Compliance with the Requirements of the Worksite Environmental Management Plans

Seventeen (17) findings were raised against the requirements of the WEMPs during the reporting period; two (2) Non-compliances, five (5) Areas for Improvement, and ten (10) Observations. The findings were largely related to inadequate on-site environmental controls at specific works areas, and to process issues. Controls related to dust generation, sediment control, and tracking of mud on to roads were not always adequate.

Eighteen (18) findings were closed, and three (3) remained open.

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

Compliance with the Requirements of the Management Plans

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

Four (4) new findings were raised during the reporting period; two (2) Non-compliances, one (1) Area for Improvement, and one (1) Observation. The Non-compliances related to poor site water management. The remaining findings related to documented sustainability requirements.

Nine (9) findings were closed in the reporting period, and two (2) remained open.

Spark has revised environmental documentation to more accurately reflect actual environmental management practices and has been more thorough in implementing the defined environmental management arrangements. However, package-wide issues were noted relating to the management of water on sites. Consistent with the repeated findings about on-ground controls for water, recurring findings for the implementation of related supporting management process indicate broader systemic areas for improvement.

Compliance with the Requirements of the Construction Compound Plans

No new findings were raised against the requirements of the CCPs. No findings remain open.



1 Background to the audits

1.1 The North East Link Program

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

The North East Link Program (NEL) includes:

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

The Central Package Scope of Works includes:

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

Figure 1 shows an outline of the NEL works.

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

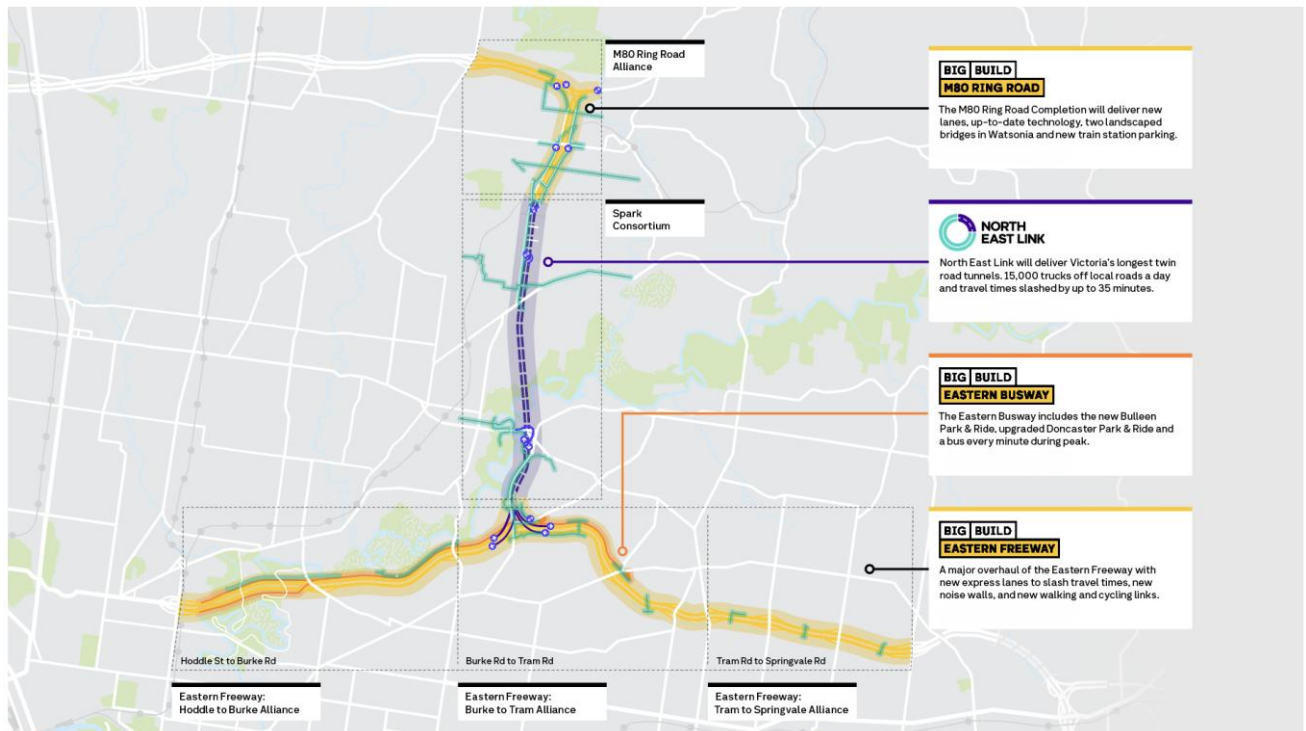


Figure 1: Schematic of the NEL works

1.2 NEL works

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

Project Wide

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

Northern

- Watsonia portal and open trench works including piling, diaphragm walls, and bulk soil excavation
- Winsor Reserve spoil shed



- Vent tunnel
- Watsonia Roadworks; surface works including road works
- Lower Plenty cut and cover works including piling, diaphragm walls, and bulk soil excavation
- Roadworks at Lower Plenty and Rivergum Walk, and other surface works at Lower Plenty.

Southern

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

Tunnels

- Tunnel Boring Machine (TBM) tunnels and associated support works such as spoil treatment and water treatment
- Mined tunnels undertaken through Sequential Excavation Method (SEM).

1.3 Purpose of this report

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

This six-monthly report summarises the audit activities and outcomes during the period covering construction activities by Spark D&C from November 2025 to April 2026.



2 Environmental Management Requirements

2.1 Environmental Management Framework

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

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

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

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

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

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

The EMF documentation is summarised below in Figure 2.

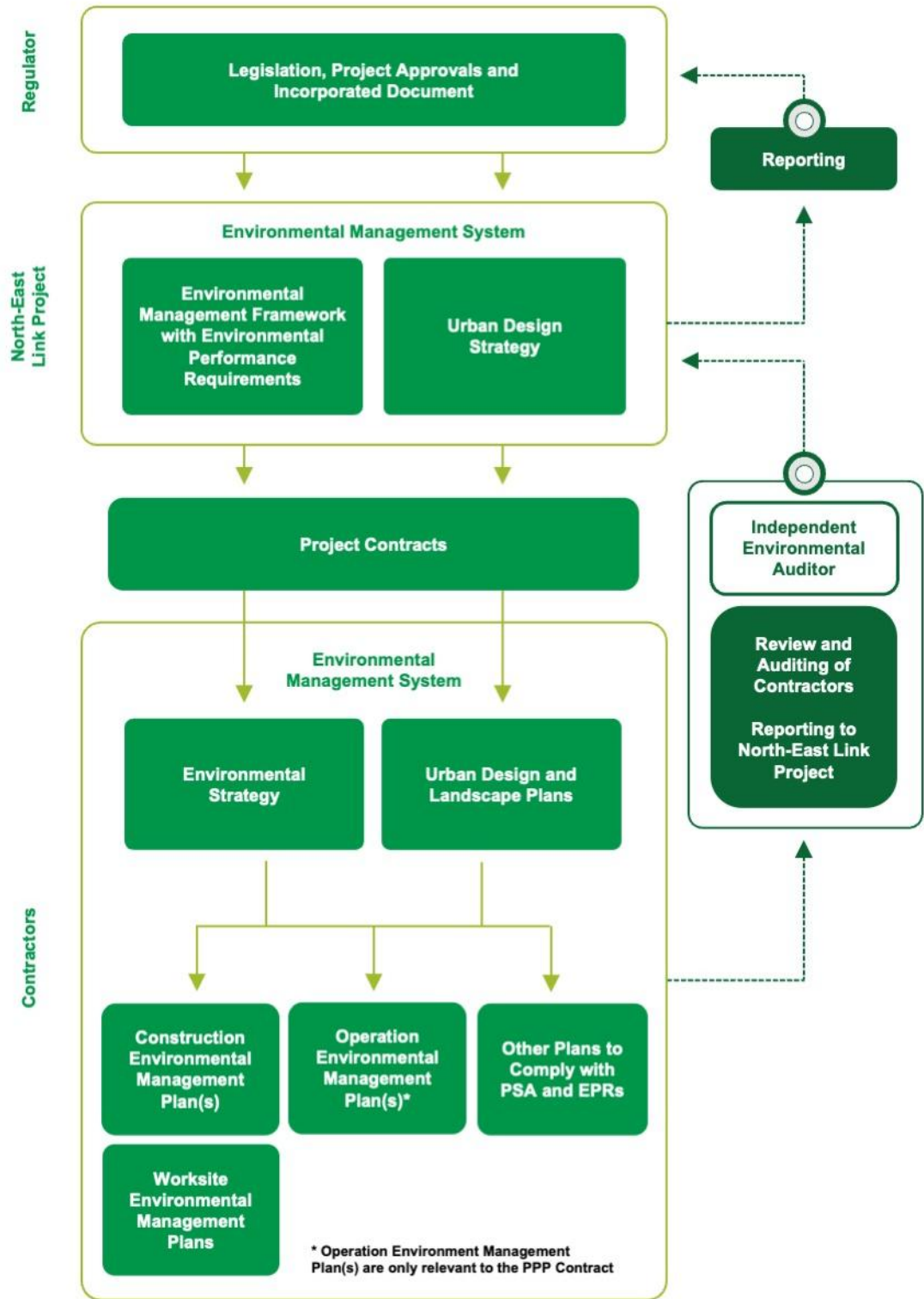


Figure 2: Environmental Documentation

(adapted from the EMF)



2.2 Planning Scheme Amendment (GC98) - NEL Incorporated Document

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

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

2.3 Requirements of the EMF

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

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

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

2.3.1 Environmental Performance Requirements

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

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



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

Spark's activities and scope of works must comply with all relevant EPRs, as defined in the EMF and Table H17.1 of the PSDR (which replicates the EPRs and defines responsibilities for meeting them). Not all the requirements of the EPRs are applicable to every stage of the works, and not all the requirements are the responsibility of Spark. Of the 110 EPRs, Spark D&C must comply with 99 of these in whole or part, and NELP is responsible for compliance with all or part of 10 EPRs

The requirements applicable to Spark's D&C activities are considered in audit planning. All applicable EPRs are audited, taking a risk based approach, and all EPRs are audited at least once annually. Fifty-nine (59) of the EPRs for which Spark is responsible were audited in the reporting period.

2.4 Spark environmental documentation

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

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



- Spoil Management Plan
- Surface Water Management Plan
- Sustainability Management Plan
- Transport Management Plan
- Tree Canopy Replacement Plan
- Tree Removal Plan
- Waste Acid Sulfate Soils (WASS) Management Plan.

Spark D&C has also developed an Environmental Monitoring and Management Plan (not required by the EPRs)

- WEMPs. These are:
 - Worksite Environmental Management Plan – Ancillary Works
 - Worksite Environmental Management Plan – Watsonia - Winsor Reserve
 - Worksite Environmental Management Plan – Watsonia Tunnels
 - Worksite Environmental Management Plan – Lower Plenty
 - Worksite Environmental Management Plan – Manningham
 - Worksite Environmental Management Plan – Bulleen.
- CCPs. These are:
 - Watsonia Construction Compound Plan – Vent Office Compound
 - Watsonia Construction Compound Plan – TBM Compound
 - Watsonia Construction Compound Plan – Civil and Roads Compound
 - Lower Plenty Construction Compound Plan – Structures Compound
 - Lower Plenty Construction Compound Plan – Mobilisation Compound
 - Manningham Construction Compound Plan – SEM Compound
 - Manningham Construction Compound Plan – Structural and M&E Compound
 - Bulleen Construction Compound Plan – Civil, Structural and Roads Compound
 - Bulleen Construction Compound Plan – Cut and Cover and SEM Compound
 - Winsor Reserve Construction Compound Plan – Spoil Handling Facility
 - Boral Batch Plant Construction Compound Plan
 - Manningham North Construction Compound Plan
 - Motorway Control Centre Construction Compound Plan.



2.5 Role of the Independent Environmental Auditor

The EMF requires an IEA be appointed to undertake reviews of the environmental documentation, and environmental audits of compliance with the documentation required by the Incorporated Document, the EMF, and the EPRs. The overall objective for audits by the IEA is defined in the EMF: *“The Independent Environmental Auditor must conduct regular audits of contractors’ compliance with the EMF, EPRs, Environmental Strategy, CEMP, WEMPs, CCPs, OEMP, any other plans required by the EPRs, conditions of Project approvals, and as required by NELP. Audits must occur prior to and during construction and for five years after opening of the Project, or as otherwise agreed with the Minister for Planning.”*

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



3 Audit activities

3.1 Environmental documentation verification

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

3.2 Audit program

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

- EPRs are audited at least annually (with more frequent audits for high-risk activities)
- The Environmental Strategy is audited at annually, or when there are material changes.
- The environmental management system elements of the CEMP to be audited six-monthly
- The elements of the CEMP critical to effective environmental management to be audited quarterly
- The applicable CEMP sub-plans and Management Plans required by the EPRs to be audited quarterly for higher risk environmental aspects, and at least annually for lower risk environmental aspects
- Applicable WEMPs and CCPs audit frequency based on construction activities and environmental risks.

3.3 Audit conduct

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

For audits of Spark D&C each audit includes:

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



Figure 3: Audit process

3.4 Audit objectives, scope, and criteria

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

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

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

Table 1: Summary audit scope

Key Documents	Nov 25 (WEMP)	Dec 25 (Quarterly)	Feb 26 (WEMP)	Mar 26 (Quarterly)	Apr 26 (WEMP)
EPRs (as scheduled)		✓	✓ EPR GM4	✓	
Environmental Strategy				✓	
Construction Environmental Management Plan		✓ (selected elements)	✓ (key elements related to the subsidence at AJ Burkitt Oval)	✓ (all applicable elements)	
Management Plans required by the EPRs		✓ (selected plans)		✓ (selected plans)	
Worksite Environmental Management Plans (WEMPs)	✓	✓	✓	✓	✓
Construction Compound Plans (CCPs)				✓ CCP-004 Lower Plenty (Rev 5)	

The following PSDR clauses were included in the March 2026 audit scope and assessed as compliant:

- Part F1 1.11 Audit, monitoring and verification – Spark internal audits every 3 months
- Part F1 CI 7, table F1.1 – six-monthly reviews of plans
- Part F6, CI 15.3 - annual Sustainability report.

No audit was conducted in January 2026.

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

3.5 Construction activities during the reporting period

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

Table 2: Construction activities during the reporting period.

Audit date	Construction activities
November 25	• Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment



Audit date	Construction activities
	• Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards.
December 25	• Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Cross passage and associated works • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards.
February 26	• Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Cross passage and associated works • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Installation and maintenance of environmental controls including water treatment plants • Waste disposal



Audit date	Construction activities
March 26	• Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards • Remedial works at AJ Burkitt Oval. • Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Cross passage and associated works • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Installation and maintenance of environmental controls including water treatment plants • Waste disposal • Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards • Remedial works at AJ Burkitt Oval.
April 26	• Site civil works including piling and concrete pours • Cut and Cover tunnelling • Excavation and spoil removal • SEM tunnelling at Manningham and Bulleen • TBM tunnelling of the North and South bound tunnels from Lower Plenty to Manningham • Cross passage and associated works • Works associated with the installation of the MCC at Manningham and the AMCC at Lower Plenty • Storage and handling of tunnel segments at Watsonia • Operation of the Winsor Reserve TBM spoil handling facility and ancillary equipment • Installation and maintenance of environmental controls including water treatment plants • Waste disposal

**Audit date****Construction activities**

- Storage of plant, equipment and dangerous goods at the Thomastown (Trawalla) and Templestowe (Paddles) logistics yards
- Remedial landscaping works at AJ Burkitt Oval.



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	The absence of, or the failure to implement and maintain, one or more requirements of the relevant environmental documentation, or a situation, which would, on the basis of available objective evidence raise significant doubt as to the effectiveness of environmental management. Note: A non-compliance may be an individual non-compliance or a number of minor but related audit non-compliances, which when considered in total are judged to constitute a non-compliance
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 were 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 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	4	4	0
Afl	7	8	12	3
O	5	11	13	3
Total	12	23	29	6

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

A total of twenty-three (23) audit findings were raised comprising four (4) Non-compliances, eight (8) Areas for Improvement, and eleven (11) Observations.

The highest number of audit findings were raised in the December 2025 quarterly audit (see Figure 4). This is consistent with the wider scope of quarterly audits.

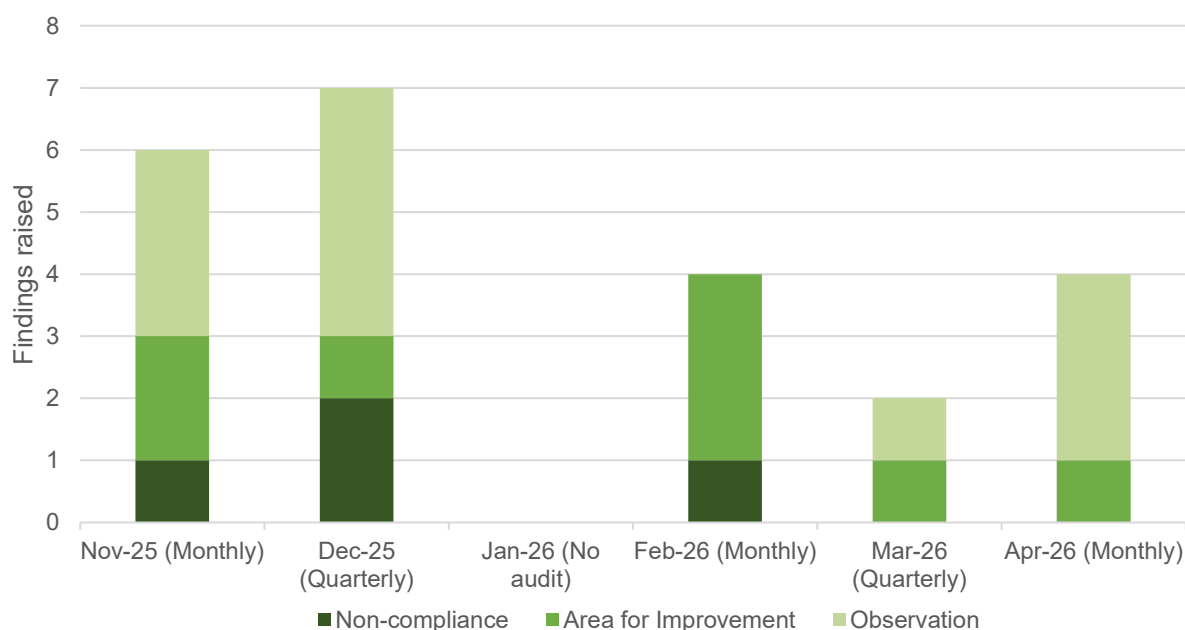


Figure 4: Audit findings by type and audit date during the reporting period

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

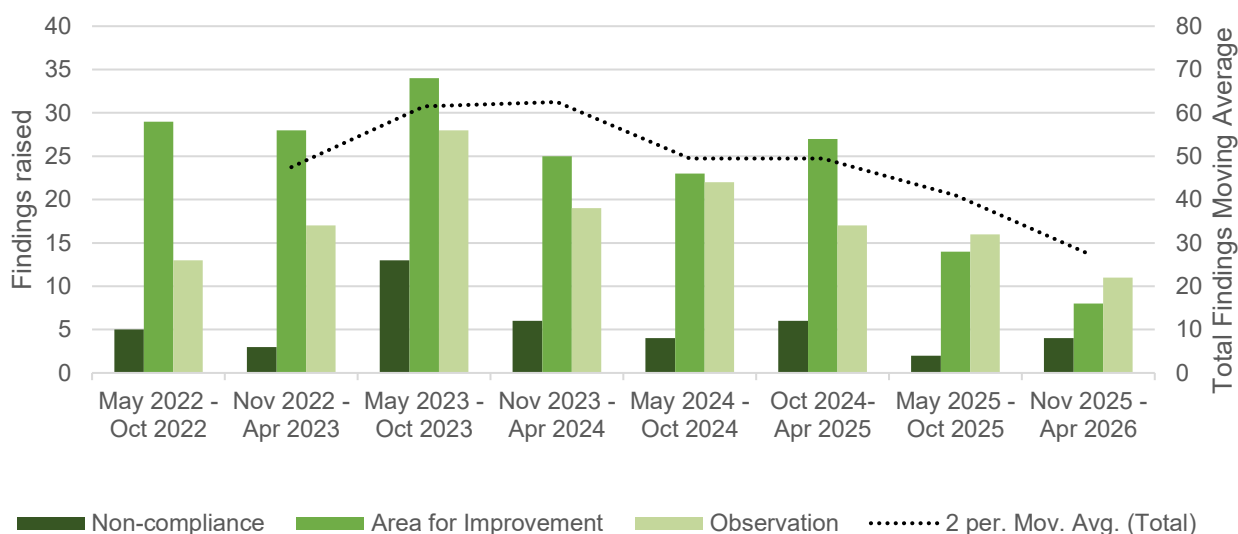


Figure 5 Audit findings by classification and reporting period - Project commencement to April 2026.

Spark D&C established corrective actions to address audit findings. Twenty-nine (29) findings were closed during the reporting period. Six (6) findings remained open at the end of the reporting period. (See Figure 6).

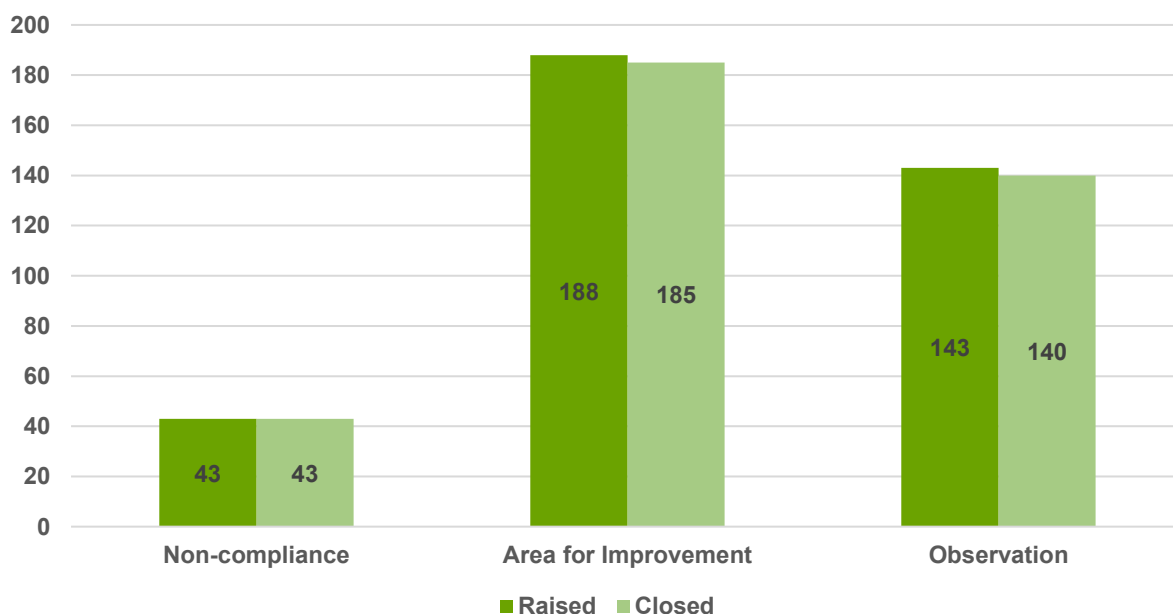


Figure 6: Cumulative audit findings raised and closed - Project commencement to April 2026

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 fifty-nine (59) planned and applicable EPRs for which Spark is responsible, and as agreed with NELP and Project Co, were audited for the period. This represents 60% of the applicable EPRs. At least one EPR from each of the 17 EPR categories was included in the six-month period and EPR GM4 was audited twice. The monthly audit conducted in February 2026 included EPR GM4 in relation to the environmental management of the subsidence at AJ Burkitt Oval.

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.

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

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

Table 4: Summary of EPR audit findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	0	0	0
Afl	1	1	1	1
O	0	0	0	0
Total	1	1	1	1

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

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

Figure 7 shows the distribution of EPRs in each of the categories noting which were audited, and the status of compliance for the reporting period. Only EPRs relevant to the design and construction underway during the reporting period were included in the audit schedule for the period. Not all EPRs have equally detailed requirements, and there are different numbers of EPRs in each EPR category. The number of EPRs audited does not directly reflect the relative weight of environmental management requirements.

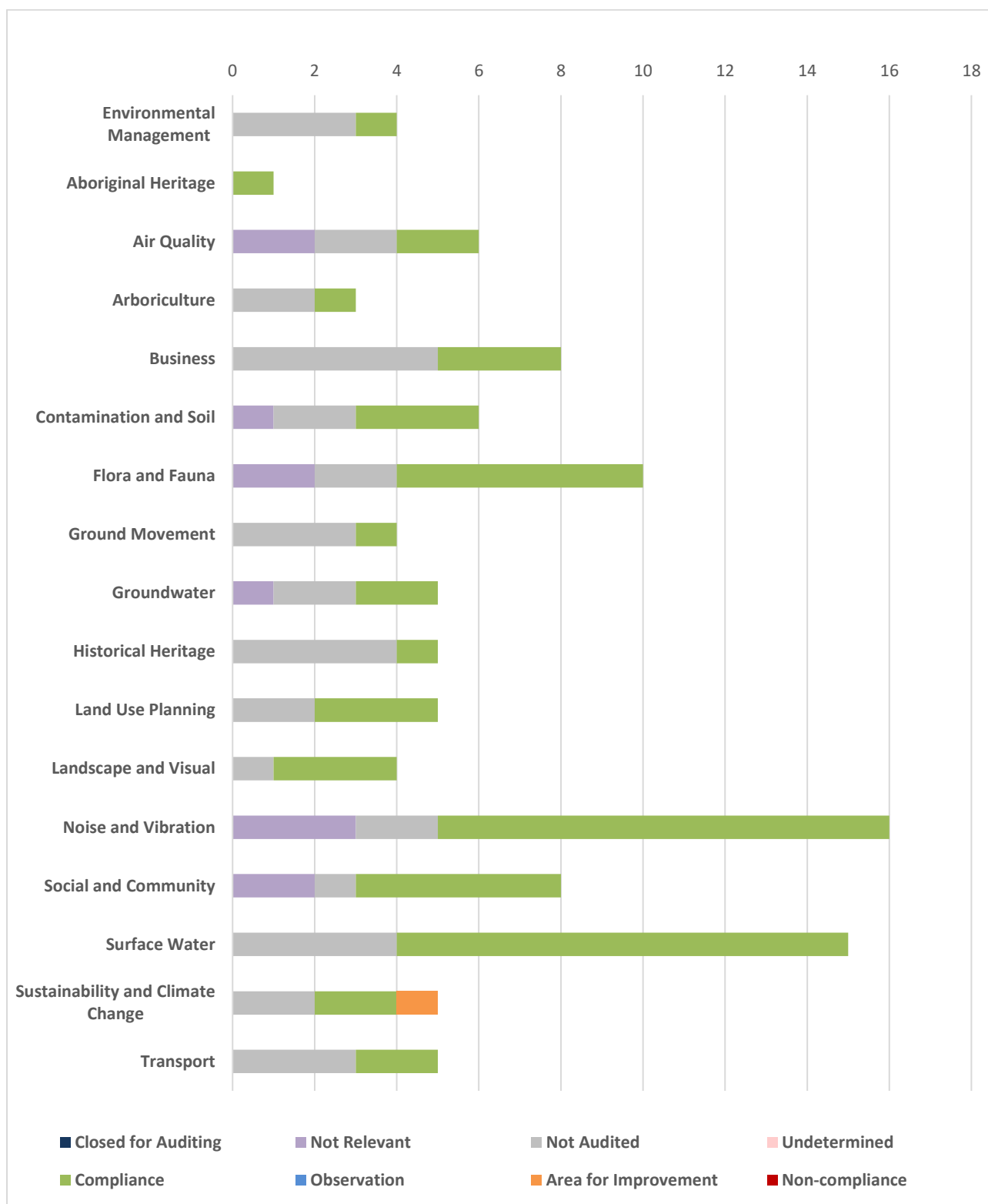


Figure 7: EPR audit findings by EPR category November 2025 to April 2026

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



4.5 Implementation of the Environmental Strategy

The Environmental Strategy was audited in March 2026. No findings were raised and none remained open at the end of the reporting period (see Table 5).

Table 5: Environment Strategy audit findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	0	0	0
Afl	0	0	0	0
O	0	0	0	0
Total	0	0	0	0

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

4.6 Implementation of the Construction Environmental Management Plan

An audit of the selected key elements of the CEMP was conducted in December 2025 and all applicable elements in March 2026. In addition, a targeted audit of relevant elements of the CEMP was conducted in February 2026 in relation to the environmental management of the subsidence at AJ Burkitt Oval. One (1) new Area for Improvement finding was raised in relation to the environment-related incident management processes for the AJ Burkitt Oval subsidence event. The finding was process related.

A summary of the audit findings is given below.

Table 6: CEMP audit findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	0	0	0
Afl	0	1	1	0
O	0	0	0	0
Total	0	1	1	0

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

One (1) audit finding was closed; no (0) Non-compliances, one (1) Areas for Improvement, and no (0) Observation. No (0) findings remained open.

4.7 Implementation of the Worksite Environmental Management Plans

The WEMPs applicable to the works underway were audited each month during the reporting period. Seventeen (17) findings were raised against the requirements of the WEMPs during the reporting period; two

(2) Non-compliances, five (5) Areas for Improvement, and ten (10) Observations. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting the construction activities, changed configurations in work sites, and to process implementation issues.

Spark made satisfactory progress in addressing the findings, with eighteen (18) previous findings closed and three (3) remaining open (see

Table 7).

Table 7: WEMP audit findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	2	2	0
Afl	1	5	6	0
O	3	10	10	3
Total	4	17	18	3

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

4.8 Implementation of Management Plans

Spark has developed Management Plans to address the environmental management requirements for specific environmental aspects, and to meet the requirements of the EPRs. The applicable elements of the Management Plans selected based on risk, were audited in December 2025 and March 2026.

Four (4) new findings were raised during the reporting period; two (2) Non-compliances, one (1) Area for Improvement, and one (1) Observations (see Table 8).

Both the Non-compliances were raised against the requirements of the SWMP for uncontrolled and/or unpermitted off-site discharge of water. The other findings related to insufficient implementation of documented sustainability management arrangements.

Table 8: Management Plans findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr2026 period
N	0	2	2	0
Afl	5	1	4	2
O	2	1	3	0
Total	7	4	9	2

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

4.9 Implementation of Construction Compound Plans

CCP-0004 Lower Plenty Construction Compound Plan (CCP) – Structures Compound was audited in the reporting period. No findings were raised and none open at the end of the reporting period. See Table 9



Table 9: CCPs findings November 2025 to April 2026

Finding Type	Open at start of Nov 2025 - Apr 2026 period	Raised during Nov 2025 - Apr 2026 period	Closed during Nov 2025 - Apr 2026 period	Open at end of Nov 2025 - Apr 2026 period
N	0	0	0	0
Afl	0	0	0	0
O	0	0	0	0
Total	0	0	0	0

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

A CCP-related finding was raised against the Lower Plenty WEMP as the relocation of the construction compound huts within the Lower Plenty construction area had commenced without an approved CCP.

5 Audit conclusions

The audit findings trends over the reporting periods show that Spark's documented environmental management arrangements have improved to reflect actual environmental management processes, and Spark's implementation of these processes has improved. The number of findings against the requirements of the WEMPs (largely related to on-ground controls) has increased slightly from the previous reporting period. The number and the nature of WEMP-related findings correspond with the scope and complexity of construction activities.

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

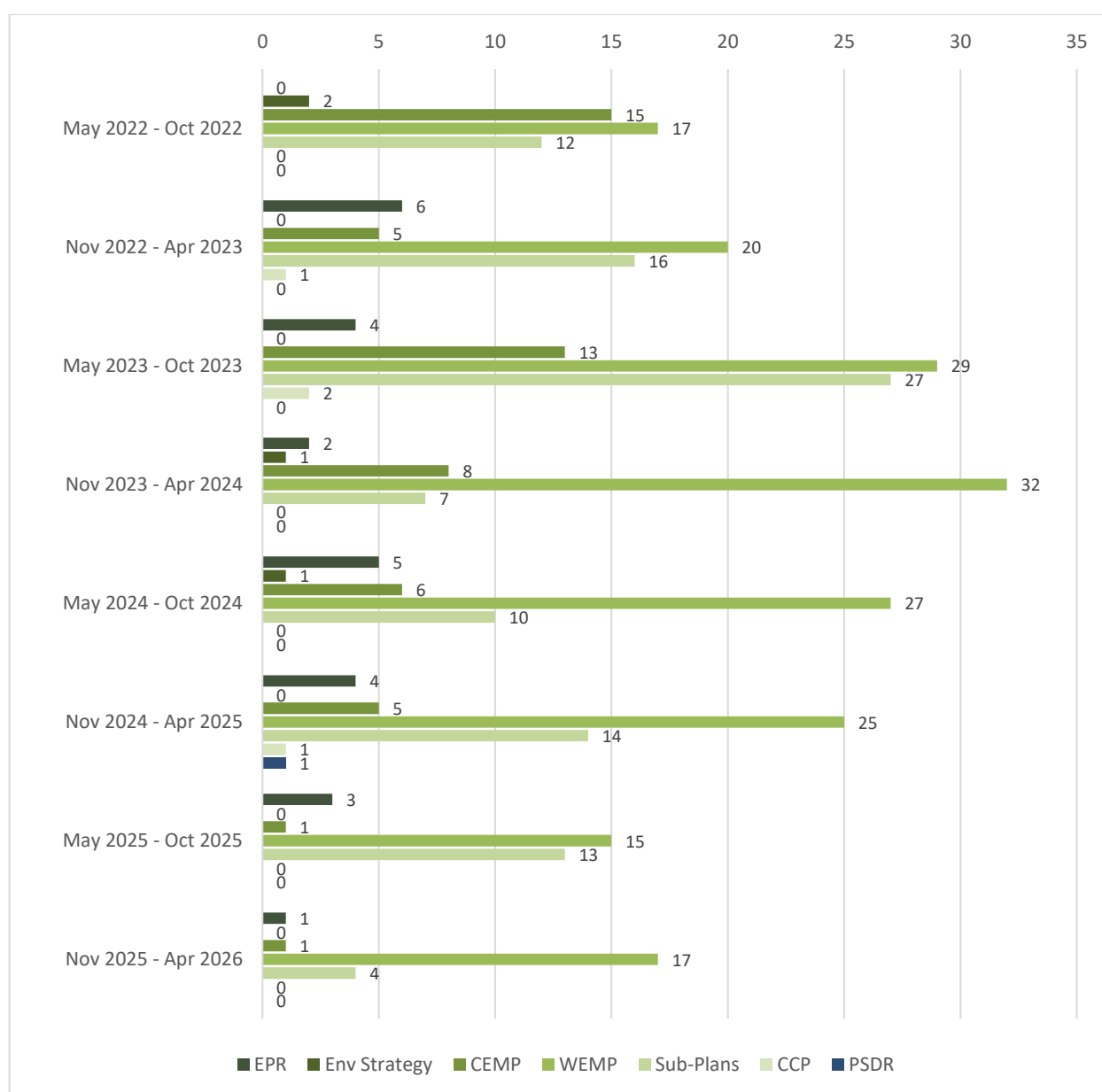


Figure 8: Audit findings by reporting periods



5.1 Compliance with Plans required in the Incorporated Document

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

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

5.2 Compliance with Environmental Performance Requirements

Overall, the requirements of the EPRs audited were met.

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

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

5.3 Implementation of the Environmental Strategy

The Environmental Strategy provides an adequate framework for environmental management. The Environmental Strategy was audited in the six-month reporting period.

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

5.4 Implementation of the Construction Environmental Management Plan

The CEMP is the main overarching document which outlines the processes and systems to manage Spark D&C's environmental aspects. The CEMP has been documented to meet the requirements of ISO14001.

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

CEMP-related audit findings show that Spark's environmental management system is maintained and that the documented environmental management arrangements are increasingly reflecting actual environmental management practices.

Findings against the CEMP have been raised in each reporting period (see Figure 8).

Spark D&C continued to address these findings. There is a reduction in CEMP related findings over time.



5.5 Compliance with the requirements of the Worksite Environmental Management Plans

The WEMPs have been established to meet the requirements of the EMF and the PSDR. However, they remain complex documents for managing site environmental management. The findings were related to inadequate on-site environmental controls at specific works areas, reflecting the nature of the construction activities, and to process implementation issues.

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

The number of findings against the WEMPs has slightly increased from the previous reporting period. (see Figure 8).

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

5.6 Compliance with the requirements of the Management Plans

The EMF requires the development and implementation of specific Management Plans. Spark has developed all the plans required for the scope of work undertaken during the reporting period.

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

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

Spark has revised environmental documentation to more accurately reflect actual environmental management practices and has been more thorough in implementing the defined environmental management arrangements. However, package-wide issues were noted relating to the management of water on sites, and to mud tracking on to roads. Consistent with the repeated findings about on-ground controls for water and mud tracking, recurring findings for the implementation of related supporting management process indicate broader systemic areas for improvement.

5.7 Compliance with the requirements of the Construction Compound Plans

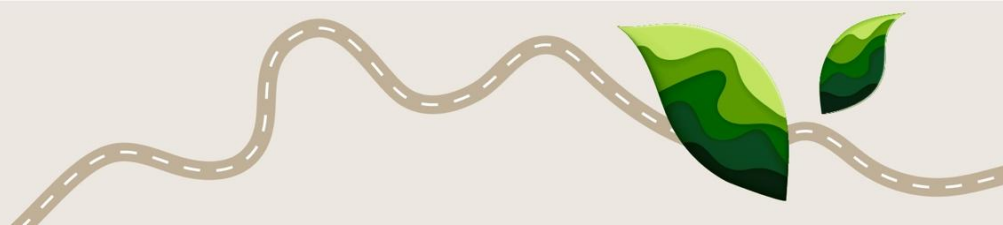
The development of Construction Compound Plans (CCPs) to the satisfaction of the Minister for Planning is required by the Incorporated Document. No new audit findings were raised against the requirements of the approved CCPs and there were no open audit finding. A CCP-related finding was raised against the Lower Plenty WEMP as the relocation of the construction compound huts within the Lower Plenty construction area had commenced without an approved CCP.

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



Appendix 1 – EPRs audited in the reporting period

Audit date	EPRs audited	
December 2025	Environmental Management (EMF)	EMF4
	Air Quality (AQ)	AQ6
	Arboriculture	AR2
	Business (B)	B2, B3
	Flora and Fauna (FF)	FF2, FF3, FF4, FF8
	Groundwater (GW)	GW2, GW3
	Land Use Planning (LP)	LP2, LP3, LP5
	Landscape and Visual (LV)	LV1, LV2
	Noise and Vibration (NV)	NV13, NV14
	Social and Community	SC1, SC2, SC4
	Surface Water (SW)	SW1, SW4, SW8, SW9, SW10, SW12
February 2026	Ground movement (GM)	GM4
March 2026	Air Quality (AQ)	AQ1
	Aboriginal Heritage	AH1
	Business (B)	B5
	Contamination and soil (CL)	CL1, CL3, CL4
	Flora and Fauna (FF)	FF1, FF6
	Ground movement (GM)	GM4
	Historical heritage (HH)	HH2
	Landscape and Visual (LV)	LV4
	Noise and Vibration (NV)	NV1, NV3, NV6, NV8, NV9, NV10, NV11, NV12, NV15
	Social and Community	SC5, SC6
	Surface Water (SW)	SW3, SW6, SW11, SW14, SW15
	Sustainability	SCC2, SCC3, SCC5
	Transport	T1, T4



Appendix 2 – Audit findings and summary of actions taken

Audit Findings Raised During the Reporting Period

Table 10: Summary of audit findings against the Environmental Strategy

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

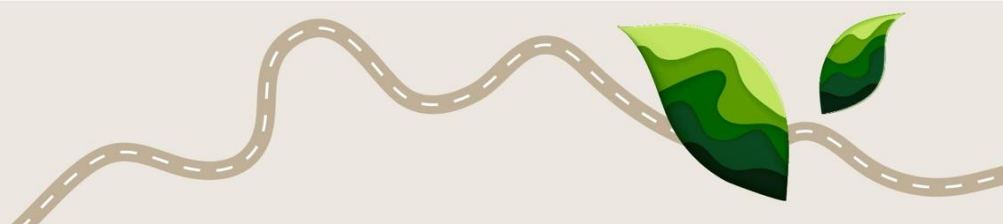


Table 11: Summary of audit findings against the EPRs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Apr-26	IEA-0426-01	Afl	EPR SCC2 Minimise greenhouse gas emissions: Lights were observed on during the day across the north and the south including diesel generator powered light towers	Actions to address this finding were not complete during the reporting period. This finding related to on-site environmental controls and represented a low risk to the environment.	Open	

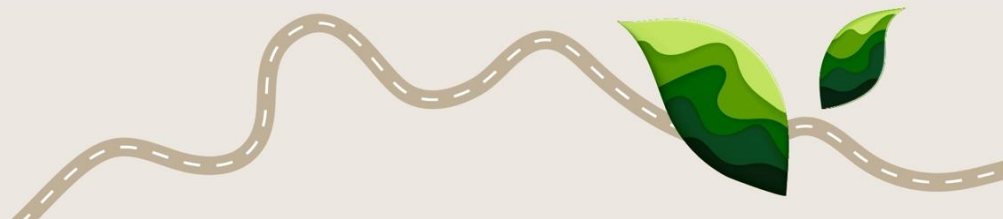


Table 12: Summary of audit findings against the CEMP

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Feb-26	IEA-0226-04	Afl	CEMP 10.3 Environmental incidents: The AJ Burkitt Oval tunnelling related subsidence incident was not fully managed as an environmental incident as per the definition and processes in the CEMP.	Spark implemented appropriate environmental management arrangements for the management of the rehabilitation of the subsidence area. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Mar-26

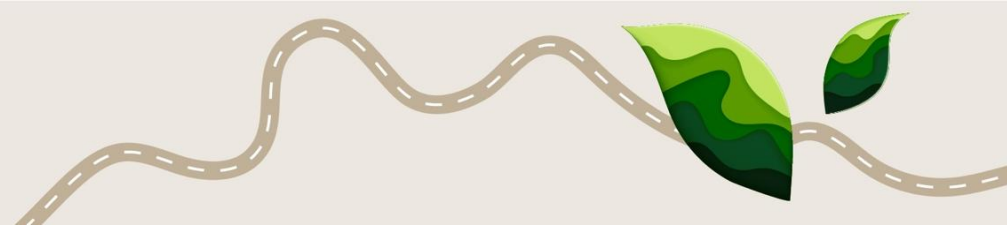


Table 13 Summary of findings against the PSDR

The following PSDR clauses were included in the March 2026 audit scope:

- Part F1 1.11 Audit, monitoring and verification – Spark internal audits every 3 months
- Part F1 CI 7, table F1.1 – six-monthly reviews of plans
- Part F6, CI 15.3 - annual Sustainability report.

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

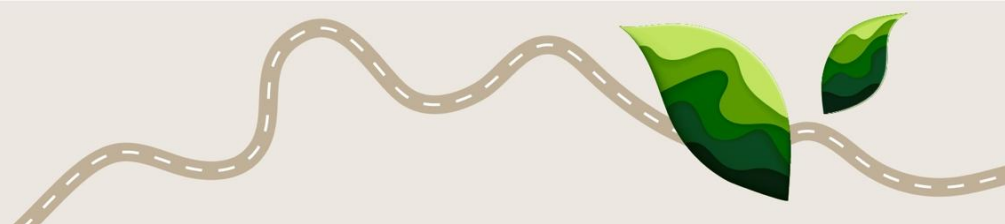
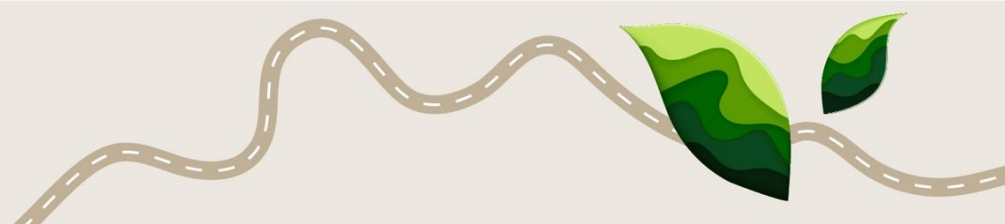
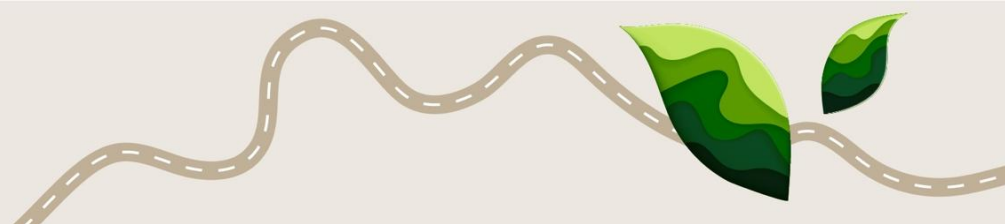


Table 14: Summary of audit findings against the WEMPs

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/Closed)	Date Closed
Nov-25	IEA-1125-02	O	WEMP 20 Winsor 9 Environmental Aspects – Flora and Fauna: At the time of the audit, the project wildlife handler had not been contacted regarding the relocation of a blue tongue lizard that was trapped in the Winsor shed spoil bins. It is acknowledged that at the time, the lizard was in imminent danger of serious harm.	Spark subsequently contacted their wildlife handler who confirmed that a licensed handler should have relocated the blue tongue lizard. The handler also noted that the immediate action taken to remove the lizard from the spoil bin was appropriate given the imminent danger faced by the lizard. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-25
Nov-25	IEA-1125-03	Afl	WEMP 31 Winsor 9 Environmental Aspects – Surface Water Management: Winsor stormwater pit sandbags had not been reinstated after the pit was cleaned.	At the subsequent audit it was observed that the sandbags at Winsor had been reinstated. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Dec-25
Nov-25	IEA-1125-04	Afl	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: No FOD mats were installed at the GB06 exit.	At the subsequent audit it was observed that the FOD mat at GB06 had been reinstated. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Dec-25
Nov-25	IEA-1125-05	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: The drainage valves on the Lower Plenty water treatment plant bund were open.	At the subsequent audit it was observed the bund drainage valves were closed. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-25
Nov-25	IEA-1125-06	O	WEMP 34 Bulleen 2.3 Key Reference Documents Secondary Approvals: The trade waste monitoring spreadsheet had not been updated with the current Bulleen trade waste parameters.	At the subsequent audit it was noted that the trade waste monitoring spreadsheet had been updated. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Dec-25	IEA-1225-02	N	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: During the audit, construction water was observed flowing out of the Lower Plenty sediment pond and into Banyule Drain.	At the subsequent audit it was observed that the pond had been expanded with increased capacity. The dewatering process was improved. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-26
Dec-25	IEA-1225-03	Afl	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: The ERSED controls including the rumble grid, asphalted haul road and FOD mats had not been adequately maintained, leading to mud tracking on Greensborough Road near Gate GB07.	At the subsequent audit it was observed that ERSED controls have been maintained and improved. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-26
Dec-25	IEA-1225-05	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: An unprotected drain was observed adjacent to the WASS stockpile near the eastern boundary hoarding at Lower Plenty	At the subsequent audit it was observed that the WASS stockpile had been removed and the drain protected. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-26
Dec-25	IEA-1225-06	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: The FOD mat at Gate GB05 near Blamey Road had dislodged from its control position.	At the subsequent audit it was observed that the FODs at GB05 has been reinstated. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Feb-26
Dec-25	IEA-1225-07	O	WEMP 34 Manningham 9 Environmental Aspects – Arboriculture: TPZ (for Tree 7131) at Trinity North had not been maintained.	At the subsequent audit it was observed that the TPZ was in good condition and free of debris. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Feb-26
Feb-26	IEA-0226-01	N	WEMP-32 Lower Plenty 2.3 Key Approvals: Relocation of the construction compound huts within the Lower Plenty construction area had commenced without an approved CCP. It is acknowledged that the amended CCP was submitted for approval to DTP in Oct 2025 and the compound was not yet in use.	At the subsequent audit it was noted that the revised CCP had been approved by the Minister of Planning. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-26



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Feb-26	IEA-0226-02	Afl	WEMP 32 Lower Plenty 9 Environmental Aspects – Air Quality: Offsite raised dust from sediment drag out onto Greensborough Road was observed.	At the subsequent audit it was observed that implementation of sediment controls had been undertaken resulting in a reduction of dust on Greensborough Road. This finding related to on-site environmental controls and represented a medium risk to the environment.	Closed	Mar-26
Feb-26	IEA-0226-03	Afl	WEMP 34 Bulleen 9 Environmental Aspects – Land Use Planning and Landscape and Visual: A CPB badged vehicle was observed parked in the Bolin Bolin carpark next to the No Project Parking signs.	At the subsequent audit it was observed that there were no CPB badged vehicle in the Bolin Bolin carpark. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Mar-26
Mar-26	IEA-0326-02	O	WEMP-32 Lower Plenty 9 Environmental Aspects – Contamination and Soil: An oil leak from a fuel pod was observed at a Vent Tunnel laydown area.	At the subsequent audit it was noted that the area was cleaned and the leased fuel pod was removed from site. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Apr-26
Apr-26	IEA-0426-02	O	WEMP 20 Winsor Surface water: The main surface water pit at the rear of the site was not fully protected.	Actions to address this finding were not complete during the reporting period. This finding related to on-site environmental controls and represented a low risk to the environment	Open	
Apr-26	IEA-0426-03	O	WEMP 32 Lower Plenty Air quality: Minor dust tracking from a sediment laden FOD at gate LP01.	Actions to address this finding were not complete during the reporting period. This finding related to on-site environmental controls and represented a low risk to the environment	Open	
Apr-26	IEA-0426-04	O	WEMP 32 Lower Plenty Contamination and soil: Unlabelled and unbunded containers observed at Lower Plenty.	Actions to address this finding were not complete during the reporting period. This finding related to on-site environmental controls and represented a low risk to the environment	Open	

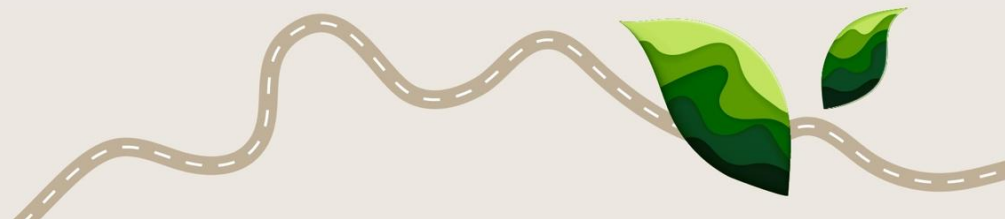


Table 15: Summary of audit findings against the Management Plans

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Nov-25	IEA-1125-01	N	SWMP 6.3.3 Stormwater and Dewatering Management: Controlled dewatering of pooled rainwater near the Lower Plenty south bound ramp penetration work #1 area had occurred without a discharge permit as per the dewatering procedure (MSP022P Rev 3).	At the next audit it was observed that dewatering had ceased and personnel retrained regarding the permitting process and need for controlled discharges to meet the discharge requirements. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Dec-25
Dec-25	IEA-1225-01	N	SWMP 6.3.3 Stormwater and Dewatering Management: Spark has not demonstrated full compliance with the stormwater and dewatering management requirements for the water discharged from Trinity Dam.	At the next audit it was noted that actions had been taken to rectify the dewatering from Trinity Dam. This finding related to on-site environmental controls and represented a high risk to the environment.	Closed	Feb-26
Dec-25	IEA-1225-04	O	SMP 2.3 Sustainability objectives and targets: The baseline to determine the net increase in % share of pollinator species in new plantings had not been established.	Spark has undertaken assessments to determine the pollinator species baseline. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-26
Mar-26	IEA-0326-01	Afl	SMP 4.6.3 Internal Audits and Reviews: Internal audits of the SMP have not been fully undertaken as defined in the SMP, including at the 6 monthly frequency	Spark was clarifying the requirements for internal audits of the SMP. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Open	

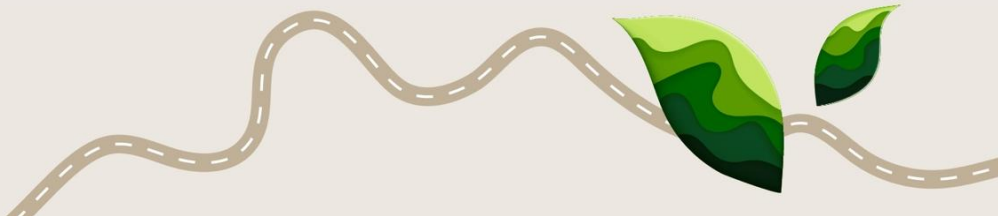


Table 16: Summary of audit findings against the CCPs

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

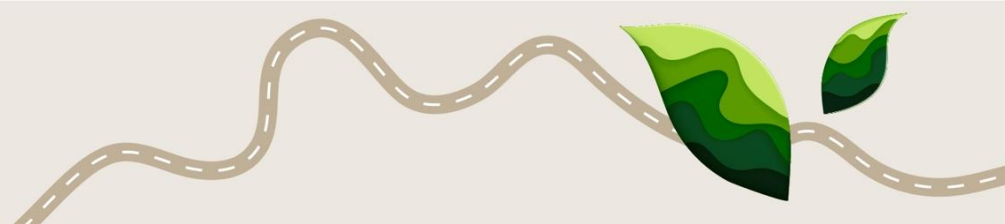
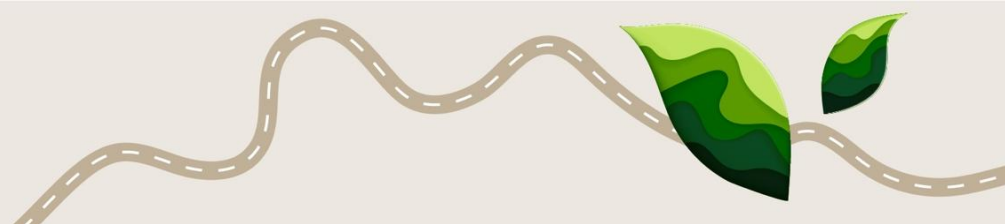
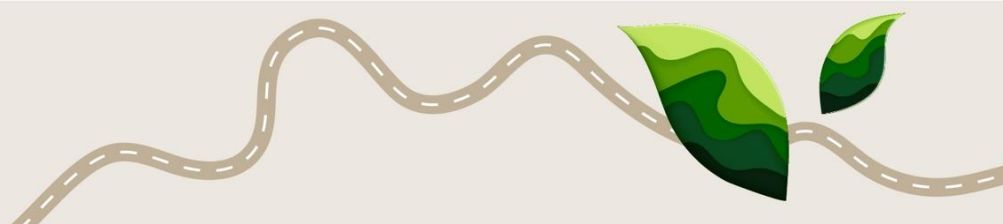


Table 17: Previous open audit findings

Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Jun-25	IEA-0625-03	O	EcMP 7.5 Fauna protection: Cited WeBuild procedure MSP22F Noise, Vibration and Light Risk Management was not used or relevant for Spark.	Spark revised the Procedure and the Ecology Management Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-26
Jun-25	IEA-0625-05	Afl	TCRP 6.2.2 Canopy Assessment and Replacement: The processes required to support tree replanting principles including determination of the planting schedule, or managing replanting stocks were not fully established in the TCRP.	Spark revised the tree planting procedures and the Tree Canopy Replacement Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-25
Jun-25	IEA-0625-06	Afl	TCRP 6.2.2 Canopy Assessment and Replacement: Process for tree planting had not established the ideal planting season to best ensure tree viability.	Spark established appropriate tree planting scheduled, its tree planting procedures and the Tree Canopy Replacement Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Dec-25
Sep-25	IEA-0925-03	Afl	SMP 2.3 Sustainability objectives and targets: Actions to meet the 60% office waste landfill diversion target (CE E.4) have not been fully implemented or effective.	Spark undertook awareness training on office waste disposal practices; however, the target remained at risk. This finding related to on-site environmental controls and represented a low risk to the environment.	Open	
Sep-25	IEA-0925-04	Afl	SMP 2.3 Sustainability objectives and targets: Systems to measure baseline and actual quantity of organic waste have not been fully established to meet the 50% landfill reduction target (CE F.1).	Spark has developed a more structured system to enable consistent and effective tracking of organic waste including the baseline. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Mar-26



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Oct-25	IEA-1025-01	Afl	EPR SCC2 Minimise greenhouse gas emissions: Lights connected to mains power at work sites in the north and south were on during the day.	In subsequent audits it was observed that lights were mostly switched off except where required for safe conduct of activities. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Mar-26
Oct-25	IEA-1025-02	O	Ecology Management Plan (Appendix E): Not all information contained in the Kangaroo Management Procedure was current.	Spark has updated the Kangaroo Management Plan. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Feb-26
Oct-25	IEA-1025-03	Afl	SWMP 6.3.3 Stormwater and Dewatering Management: A permit for the mechanical diversion of stormwater for the existing ongoing stormwater diversion at Lower Plenty and at Bulleen have not been raised as per the recently revised Spark Dewatering and Discharge procedure (MSP022P Rev 3).	Spark raised permits as per the revised procedure. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Nov-25
Oct-25	IEA-1025-04	O	WEMP 31 9 Environmental Aspects – Contamination and Spoil: Minor quantities of unbunded chemical containers were observed incorrectly stored near the AMCC area.	In subsequent audits it was observed that chemical containers were observed to be correctly stored. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Nov-25
Oct-25	IEA-1025-05	O	WEMP 32 9 Environmental Aspects – Contamination and Spoil: Drums of unbunded hydraulic oil were observed at Watsonia.	In subsequent audits it was observed that the hydraulic oil drums were observed to be correctly stored. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Nov-25
Oct-25	IEA-1025-06	O	WEMP 32 Lower Plenty 9 Environmental Aspects – Surface Water Management: A small area of the egress road downstream of the wheel wash at GB07 was unsealed – leading to some mud tracking.	Spark altered the site vehicle route to avoid the unsealed area. This finding related to on-site environmental controls and represented a low risk to the environment.	Closed	Dec-25



Audit Date	Finding No.	Finding type	Finding	Actions	Status (Open/ Closed)	Date Closed
Oct-25	IEA-1025-07	Afl	WEMP 33: 9 Aboriginal Cultural and Historical Heritage: A Synergy event for the RAP inspection finding relating to CHMP 20374 Condition 6 for the installation of fencing to protection modern scar trees at Manningham near the 1350mm drain area, had not been recorded.	Spark recorded the appropriate details with related actions managed. This finding related to documented environmental management arrangements and did not represent an immediate material risk to the environment.	Closed	Nov-25



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