

Glenrowan Enhancement Site – CEMP audit June 2023

Site Name	Glenrowan Enhancement Site	Project Manager (s)	Tom Foley
Audit Physical Location	Beaconsfield Parade, Glenrowan	Senior Manager (s)	Miguel Reyes – Construction Manager Peter Lacki – Senior Project Engineer
Audit Date	20.06.2023	Auditor (s)	Mark Nan Tie – Accent Environmental. Independent Environmental Auditor
Entity being Audited	McConnell Dowell – RSD Australia	Auditee	Steve Eeles – McConnell Dowell Environment and Sustainability Manager Damon Barclay – McConnell Dowell-Environmental and Sustainability Advisor
Reference	AE1221	Version	V1.5 Final
Reviewed by	Michael Cramer – Accent Environmental	Approved by	Michael Cramer – Accent Environmental
Audit Objective	To ensure conformance to the Inland Rail Construction Environmental Management Plan and associated subplans, Environmental Management Framework, relevant PSRs and conditions of project approvals in accordance with applicable Independent Environmental Auditor requirements.		
Audit Scope	Glenrowan Enhancement Site		

Audit Criteria	Construction Environmental Management Plan and associated subplans, Environmental Management Framework, relevant PSRs and conditions of project approvals.
Abbreviations used in this document	OFI – Opportunity for further improvement MiNC – Minor Non Conformance MNC – Major Non Conformance
Introductory Notes	<p>The audit focus was the Glenrowan Enhancement site. Piling has commenced at this site. There are eight piers in varying stages of completion. Abutments have not commenced. The project has starting to construct above ground structures.</p> <p>The audit also visited the Wangaratta Hub. This is not a construction site. It does however contain a soil stockpile.</p> <p>The audit was conducted via a combination of site inspection, interviews and record/documentation checks. According to the auditees there were no special/unusual conditions on the day of the audit that would affect the assessment. The focus centred upon environmental controls detailed in the CEMP and related subplans. The audit findings are based on the available data and information provided by the auditee.</p>

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Audit criteria and findings

No.	CEMP Requirements	Audit comments and findings	Evidence
EMF 1 and PSR 6.2.1	Environmental Management System		
EMF 1 PSR 6.2.1	<p>The Contractor must prepare and implement an Environmental Management System (EMS). The EMS must be prepared in accordance with AS/NZS ISO 14001:2015</p> <p>This system must be developed, delivered and maintained to be consistent with:</p> <ul style="list-style-type: none"> a) Inland Rail’s Environmental Management System; and b) the Construction Environmental Management Plan for the Works. 	<p>Conclusion</p> <p>Conformance</p>	<p>Record of EMS online Certified by Bureau Veritas Pty Ltd,</p>
CEMP 1.4	Objectives and Targets		
CEMP 1.4	<p>McConnell Dowell is committed to maintaining a high level of excellence in environmental compliance and continual improvement, which is reflected in our organisation-wide environmental objectives and targets, relevant to all MCD works. These are presented in Table 5.</p>	<p>Site inspection and checked incident reports –</p> <ul style="list-style-type: none"> No material damage observed. No infringements from regulators 	<p>Records check</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>The objectives and performance criteria are shown in Table 6:</p> <p>Targets relevant to this plan include:</p> <ul style="list-style-type: none"> • Avoid causing damage from activities that result in negative environment and sustainability outcomes • Zero infringements from regulators • Achieve 100% compliance with monitoring requirements as outlined in this plan • Achieve 100% notification compliance to stakeholders and the community • Respond to any community complaints within 48 hours. 	<p>Compliance with monitoring, sample of records</p> <p>Notification compliance fulfilled. Checked obligations register and record of notification for night works 27/6/23.</p> <p>One community complaint received 9/3/23. Responded to on same day. This occurred during nightworks for the installation of concrete barriers at Glenrowan. Resident complained of reversing beeper noise. In response, works were promptly ceased around 10.00 pm. Positively received by resident. Complaint closed off 10/3/23.</p> <p>Conclusion</p> <p>Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP1.5	Roles and Responsibilities		
CEMP 1.5 PSR 6.1.2	<p>Environmental management roles and responsibilities</p> <p>Table 7 summarises the Project resources that will contribute to the overall management of the Project's environmental requirements.</p> <p>The Contractor must ensure that the Environment Manager is adequately supported by additional resources to meet the requirements of the Contract.</p>	<p>Checked key environmental resources – Environment and Sustainability Manager is supported by two Environmental advisors (and a third is due in July 2023). Further support is provided by an external consultant for climate change risk and energy assessment. Regional sustainability support is provided 2-3 days a week from MCD corporate.</p> <p>The team including operational staff input appears to be effectively managing environmental requirements with the level of resourcing. However, it is noted that the documentation and reporting requirements for the project</p>	<p>Check of resources and qualifications for key personnel</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>are considerable and will increase as more sites move into construction, requiring a commensurate level of resource.</p> <p>An internal environmental audit on 31/5/23 noted that the responsibility for assigning environmental resource had not been designated. The MCD PM will undertake this role. This will be reflected in the next version of the CEMP.</p> <p>Requirement PSR 6.3.23, requires that a standalone Sustainability Manager be appointed.</p> <p>Currently the environmental Manager is also undertaking the Sustainability Manager</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>role. MCD provided correspondence of 19/1/23 to ARTC requesting that the sustainability role be combined. A response has not been received.</p> <p>Conclusion</p> <p>MiNC</p> <p>Requirement PSR 6.3.23, requires a standalone Sustainability Manager. At present this role is currently combined with the Environmental Manager role. This issue has not been resolved.</p>	
1.6	Relationship with other documents - Environmental Framework		
Incorporates PSR 6.1.7, EMF 1.3	Environmental Framework, including: <ul style="list-style-type: none"> • Environmental Policy • Environmental Risk Assessment (ERA) • Issue-Specific Sub Plans 	Checked MCD MMS system and all framework elements in place. Checked sample of environmental green rules	Framework elements online

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> Environmental Green Rules Site Environmental Plans Environmental Protection Instructions 	and environmental safety instructions Conclusion Conformance	
CEMP 2.4, 2.5	Risk and Opportunity Identification Environmental Aspects and Impacts		
CEMP 2.4, 2.5 and EMF3	<p>The final ERA is provided in appendix 10. It should be noted that this document is live. As the Project moves into delivery, if additional risks are identified, they will be added to the register.</p> <p>The ERA register defines key environmental aspects and the associated impacts from works.</p>	<p>Checked MCD MMS system. A 'live' ERA is in place defining key environmental aspects and impacts. Last updated 26 / 5/23</p> <p>Conclusion Conformance</p>	'Live' ERA on system
CEMP 2.6	SEPs		
CEMP 2.6, incorporates PSR 6.1.4	<p>Site environment plans are produced for each enhancement site...</p> <p>SEPs will detail the following:</p> <ul style="list-style-type: none"> Overarching environmental 	<p>Each enhancement site has a SEP. This audit focused on the Glenrowan SEP (Rev F2) all required elements are detailed in this SEP.</p>	Check of SEP requirement compliance

No.	CEMP Requirements	Audit comments and findings	Evidence
	commitment/obligation <ul style="list-style-type: none"> • Green rules • Contact • Written summary of environmental aspects specific to each site, with an overarching risk rating • Must statements for each aspect • Hazard identification reporting process • Community complaints notification process • Emergency response process • Maps showing: <ul style="list-style-type: none"> o Location of controls o Location of no-go areas o Location of items of significance o Sensitive receivers if present o Stockpile locations o Site compound locations 	<p>Conclusion Conformance</p> <p>OFI - For the air quality monitoring label on the SEP plan, suggest adding 'noise' as well, as noise is also covered by plan.</p>	
CEMP 3.1, 3.2	Legislation Policies, Guidelines and Other Relevant Documents		
CEMP 3.1, 3.2 incorporating PSR 6.1.6	The legal requirements relevant to the scope of this Plan are detailed in Table 12 The policy and guideline requirements relevant to	Checked MCD MMS system. MCD regulator and obligations register (revision K). Legal requirements and	Check of legal and other requirements

No.	CEMP Requirements	Audit comments and findings	Evidence
	the scope of this Plan are detailed in Table 13.	<p>other obligations are comprehensively covered and kept updated (last updated 19/6/23). ARTC are moving to a shared SAI 360 system for this register.</p> <p>Conclusion Conformance</p>	
PSR6.3.12	Sustainability Management Plan		
PSR 6.3.12	<p>The Sustainability Management Plan must:</p> <p>a) be a single volume for the whole of the Contractor’s Activities;</p> <p>b) set out the processes, methodologies and initiatives to be implemented in order to achieve the Technical Requirements for sustainability; [plus requirements c) to o)]</p>	<p>Checked Sustainability management plan. (Revision 2). Contains required elements.</p> <p>Two external audits have been conducted with one being completed with the design stage. ISP reviews have been conducted quarterly. Checked ISP review 5/5/23. Noted a non-conformance for the Sustainability role not being standalone (see also CEMP 1.5 Roles and</p>	Check implementation of plan

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Responsibilities, this audit). Otherwise, several minor opportunities for improvement.</p> <p>The non conformance is the only one recorded for the project thus far.</p> <p>Project reporting. Checked MCD monthly reporting spreadsheet. It showed targets on track.</p> <p>Checked May 2023 monthly project reporting to ISC on the ARTC supplier portal. ISC scorecard. MCD are tracking against targets as reported. MCD are confident to achieve Level 3 of Management 1.</p> <p>Conclusion Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 3.3	Project Specific Requirements		
CEMP 3.3 incorporating PSR 6.1.6	<p>The requirements relevant to this Plan include those set out in the Environmental Management Framework (EMF), Environmental Performance Requirements (EPRs), PSR, Environmental Report, Planning Scheme Amendment and Incorporated Document, CHMPs, and Heritage Permits. Primary Approvals for the Project are managed by ARTC.</p> <p>MCD is responsible for obtaining any secondary approvals, consents or permits required for the project works.</p> <p>MCD must comply with conditions of any permits required for the works.</p>	<p>Heritage Permit P35524 has been issued. This permit is required as the site is on the Victorian Heritage Register H2000, Glenrowan siege site. The permit is for the bridge replacement works.</p> <p>The condition of the permit has been satisfied (correspondence 9th Feb 2023)</p> <p>TPP endorsed</p> <p>Archaeological Management Plans by GML consultants have been completed and endorsed. GML have also completed a Heritage Protection Plan.</p> <p>There are 5 stages – Currently at stage 3 for the Glenrowan bridge demolition and</p>	Check secondary approvals

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>construction. It includes processes for dealing with unexpected finds.</p> <p>Endorsed by HV – checked record of 15/6/23.</p> <p>An unexpected find occurred during Glenrowan Stage 2. Brick footings were found near the station master’s hut. Site was fenced off and an archaeologist inspected the site as per requirements.</p> <p>Council approval to be submitted for Seymour tranche slew and gantry overhead works.</p> <p>Heritage overlay – desktop assessment done, I R Planning Assessment OH 1060-1076, Stage 2. An upcoming meeting will confirm whether the need for a planning permit will be triggered under an VPO3.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>CHMP 17752 Glenrowan sighted. (See Section 4.5 Heritage)</p> <p>Landscape Management Plan – endorsed.</p> <p>Conclusion Conformance</p>	
EPR EMF 4 and EPR EMF 5	No Go zones and Priority Avoidance Zones		
	Covered under assessment of CEMP 4.3 Flora and Fauna, CEMP 4.5 Heritage and SEPs	<p>PAZs are worked on progressively. So far, two overhead sites have been set up. Photographic records checked. There will be approximately 90 to complete. They will be decommissioned when works are complete.</p> <p>Checked Habitat zone clearing tracker, May 2023. Total</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>amount approved for clearing 24.62 Ha. 1.11 Ha vegetation cleared (none EPBC listed). PAZ it yet to be put into the tracker as not fully defined at his stage – between design and construction.</p> <p>Conclusion Conformance</p>	
4.1	Air		
CEMP 4.1	<p>The air quality management plan (5-0013-110-ESS-00-PJ-0007) describes the controls and monitoring regime to be implemented to reduce the impact of dust and fumes from project construction activities.</p> <p>The purpose of this Sub-Plan is to:</p> <ul style="list-style-type: none"> • Assess the risk of construction related changes to air quality; • Provide strategies to control potential air quality impacts during construction; 	<p>The subplan contains the required elements listed in the CEMP.</p> <p>Real time monitoring is in place for PM10 and PM 2.5. Also Checked dust monitoring results. Compliant. One-off spikes 2/5/23, 23/5/23 and 16/6/23.</p> <p>Environmental Controls</p>	Inspection and records check of sub plan

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Address approval, permit/ license and contractual requirements; • Monitor for compliance with this management plan <p>Construction Environment Management Plan INLAND RAIL: Tottenham to Albury Tranche 1 EDA & D&C Phases Page 52</p> <ul style="list-style-type: none"> • Apply contingency measures in the instance of an exceedance; and • Report on findings, exceedances and incidents to support continual improvement 	<p>Environmental staff report that as dust has not been an issue, reliance has been placed on the use of water carts and the use of polymer solution with the latter being used where higher levels of suppression are required.</p> <p>Site inspection – No dust issues evident.</p> <p>Water cart observed on site ready for use.</p> <p>With wet conditions becoming more prevalent, MCD reported that street sweeping in the Wangaratta precinct has commenced.</p> <p>No burning on site.</p> <p>No odour issues to date.</p> <p>Other controls include:</p> <ul style="list-style-type: none"> • Vehicle prestart • Vehicle inspections conducted for first time on site 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Regular inspections are made including visual daily. Weekly inspections include dust from roads/stockpiles and plant & machinery.</p> <p>No diesel smoke of greater than 10 seconds observed.</p> <p>Weekly inspections in Arc GIS. 41 of 44 weeks completed. Three not completed due to lack of works. Checked two inspection reports.</p> <p>Audits. Checked Audit Schedule 2004-MCD-PRW-QAC-SCH-001, referred to in the CEMP. This document is not the correct audit schedule – should be audit schedule 2069-MCD-PRW-QAC-SCH-0001 See Section 5.6 Audits</p> <p>Site Specific Control Measures in the air quality management sub – plan:</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Community Engagement</p> <ul style="list-style-type: none"> • Community notifications undertaken • Site information board displays contacts • Complaint process in place <p>Scheduling</p> <ul style="list-style-type: none"> • Scheduling to minimize dust impacts on high wind days has not been necessary according to MCD as dust has not been an issue <p>Planning</p> <ul style="list-style-type: none"> • Planning vehicle movements, routes etc. has not been necessary according to MCD as dust has not been an issue 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Barriers</p> <ul style="list-style-type: none"> • Obstructing the path of dust transmission has not been necessary according to MCD as dust has not been an issue • Rumble grids will be installed shortly <p>Engineering controls</p> <ul style="list-style-type: none"> • Temporary stabilisation using polymer mixtures has been undertaken • Water carts used as required • Street sweeping has commenced in Wangaratta • Regular inspections made (formal weekly) 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p><i>Conclusion</i> Conformance</p>	
CEMP 4.2	Noise and Vibration		
CEMP 4.2	<p>The construction noise and vibration management plan (5-0013-110-PES-00-PJ-0003) provides a detailed approach to managing construction noise and vibration (to reduce noisy works and unavoidable works performed). Included in the plan are controls to address the following.</p> <ul style="list-style-type: none"> • Out of Hours work must meet the weekend/evening work hours and night period noise guideline targets (see EPA 1834) unless approved by ARTC • Details on the location and type of sensitive receiver • Noise/vibration complaints shall be responded to and assessed for further mitigation and monitoring and details provided to ARTC – Refer to section 5.5 for reporting • Proactive vibration monitoring undertaken during high-risk activities vibration activities 	<p>The construction noise and vibration management plan (5-0013-110-PES-00-PJ-0003) includes required listed elements.</p> <p>Communication with neighboring sensitive receivers – checked notification 7.00 pm 8 March to 6.00 am 20 March and 18-20 March 2023.</p> <p>Out of hours work has met noise guideline targets.</p> <p>The plan details the location and type of sensitive receivers.</p> <p>Complaints</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>detailed in the CNVMP</p> <ul style="list-style-type: none"> • Proactive noise monitoring undertaken during high-risk activities noise activities detailed in the CNVMP • Proactive noise modelling undertaken of high-risk activities prior to activities being carried out • Communication to neighbouring sensitive receptors on upcoming high-risk activities as per CMP • Unsealed roads will be graded regularly. Sealed access roads and hardstand areas shall have potholes filled in a timely fashion • Alternate timing of works to avoid noise sensitive times • Schedule noisy activities in least noise sensitive times • Night-time construction traffic shall be redirected away from noise sensitive receivers, in accordance with the Construction Traffic Management Plan • Appropriate construction traffic speed limits shall be established and enforced near noise 	<p>There has been one complaint re noise. See Objectives and Targets.</p> <p>Checked real time monitoring May 15, 17, 24.</p> <p>Any event exceedance triggers an email notification. A number of exceedances have occurred due to short-term extraneous noise sources such as trains. None required follow up. No exceedances reported for construction noise. Checked exceedance 25 May 2023 7.00 pm. 6 June 2023 6.45 pm Noise identified as a train.</p> <p>Noisy activities are programmed for the daytime period.</p> <p>Construction speed limits have been established.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	sensitive receivers	<p>Checked vibration monitoring for monitoring point HEGEWO for vibration levels during May. No exceedences.</p> <p>Checked monitoring data for noise sites HEX-00070 and EX-00089.</p> <p>A number of recent short-term noise exceedences were missing explanations.</p> <p><i>Conclusion</i></p> <p>OFl - A number of recent short-term noise exceedences were missing explanations.</p>	
CEMP 4.3	Flora and Fauna		
CEMP 4.3	<p>This section outlines the management of ecological aspects on the Project, including the protection measures of any EPBC Act listed species, fauna, native vegetation, and trees. There are two sub-plans that cover these</p>	<p>Checked flora and fauna management plan (Doc 3-0013-110-PVP-00-PJ-0008)</p> <p>The plan contains required elements.</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>ecological aspects:</p> <ul style="list-style-type: none"> • The flora and fauna management plan (3-0013-110-PVP-00-PJ-0008) provides: <ul style="list-style-type: none"> o A detailed approach to managing flora and fauna. o Detail on the location and type of threatened species found within the project o Details on the establishment and maintenance of NGZ to prevent impacts on protected species o Details on the results of pre-construction investigations o Process for the management of injured, orphaned or deceased animals o Process for avoiding and minimizing impact to remnant native vegetation o Details of suitably qualified ecologists o Outline controls to minimize light and noise impacts on nocturnal animals o Details on how to minimize impact on species during breeding season o Details on the tree clearing process • The Tree management plan (5-0013-110-ESS- 	<ul style="list-style-type: none"> • Objectives and targets are being met • Sighted Pre-Clearance Assessment 5/12/22 conducted by Habitat Management Services • Vegetation Disturbance Permit IRT2A checked. Fauna Interaction Register checked eg lizards/snakes moving across site. Will be updated for the MVH site, where a pre-clearance assessment will be conducted by Habitat Services Pty Ltd. • Vegetation removal tracker checked • No amphibian areas 	

No.	CEMP Requirements	Audit comments and findings	Evidence
	00-PJ-0010) provides <ul style="list-style-type: none"> o Specifics for protecting trees on site as well as the tree clearing process. o Details on how to and where to install NGZ fencing and TPZ fencing o Details of suitably qualified arborists o Opportunities for re-use 	<ul style="list-style-type: none"> • Legless lizard survey due August 2023, O/H site 1088 • Fauna fencing may be required at site 1076 as the habitat may support the Growling Grass Frog • No avian control measures required yet Other threatened species matters: <ul style="list-style-type: none"> • No Golden Sun moths found • No threatened fauna matters evident to date. This will be a consideration at the Seymour Avenell site. The site reports no interactions with fauna, with the exception of a yabby interaction, whereby yabbies	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>were relocated downstream of the swale. Reports in Fauna Interaction Register - checked</p> <p>Tree Protection Management Plan</p> <ul style="list-style-type: none"> • Objectives and targets are being met • TPZs are shown in the Glenrowan Site. Environmental Plan with 1 m added to footprint as per requirements • TPZs are inspected weekly as per TMP requirement • Vegetation Disturbance Permit gained • GIS layer used to track impacts on trees 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Inspected Tree Protection Zones (TPZ). All constructed as per Site Environmental Plan and in good order.</p> <p>A number of trees are identified in the TMP to be impacted at the new Beaconsfield Parade bridge. Of these trees, three trees were able to be salvaged close to the worksite and will be subject to arborist checks.</p> <p>Conclusion Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 4.4	Biosecurity		
CEMP 4.4	<p>The biosecurity management plan (5-0013-110-ESS-00-PJ-0003) provides a detailed approach to managing pest plants and animals, and pathogens on site.</p>	<p>Biosecurity management plan (5-0013-110-ESS-00-PJ-0003) is in place.</p> <p>The site reports that weeds have been dormant but will be emerging over time.</p> <p>Sighted pest plant tracker - in use.</p> <p>To date, work has been on sealed roads thus no active controls in place.</p> <p>Weed free declaration forms are required for new vehicles.</p> <p>Inspections – Excavation inspections are raised in hazards reporting. Checked hazard reports for 21/2/23 and 28/3/23 – checks were made for fauna in open pits.</p> <p>Sighted Daily Bulletin issued for 20/6/23 which included fauna handling information.</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Vegetation permits register checked in ArcGIS. Contains Vegetation Disturbance Permit IRT2A</p> <p>Conclusion Conformance</p>	
CEMP 4.5	Heritage		
CEMP 4.5	Heritage Management is covered in the Project Cultural Heritage Management Plans (CHMPs) (summarised in Table 19) and the Archaeology management plan (5-0013-110-ESS-00-PJ-0004.)	<p>Voluntary CHMP 17752 in place, Andrew Long and Associates- sighted. Also sighted letter notification to commence 27/9/22.</p> <p>CHMP induction program is a 13 minute video produced in conjunction with the Yorta Yorta people. The site reported that it intends to have a Yorta Yorta representative provide a face to face induction for ground breaking works.</p>	Inspection and records check of plans

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Specific compliance with the CHMP conditions not undertaken.</p> <p>Glenrowan Heritage Precinct VHR H2000 Stage 2 Archaeological Management Plan is in place – sighted.</p> <p>Conclusion Conformance</p>	
CEMP 4.6	Contamination		
CEMP 4.6	<p>A detailed summary of the proposed control actions for the management of contaminated and other soils for the Project is contained in the CL&SMP (5-0013-110-PES-00-PJ-0001). The key actions for the control of all spoil on site are specific to each site and the preliminary investigations. No general controls are listed in this section of the CEMP. The CL&SMP will be used as the primary source for all activities relating to contaminated land management.</p>	<p>CL&SMP (5-0013-110-PES-00-PJ-0001) is in place.</p> <p>Checked material tracking register.</p> <p>No soil has been transported to Seymour.</p> <p>Two loads of Cat D soil have been transported to Wangaratta under an EPA A17 permit.</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>No unexpected, contaminated soil finds to date.</p> <p>The soil stockpile onsite contains Category D soil. The stockpile has relevant signage. It has been polymer dosed to prevent erosion.</p> <p>A Site Material Movement Plan to track contaminated soils is in preparation.</p> <p>Weekly inspection checklist includes contaminated soil.</p> <p>Conclusion Conformance</p>	
CEMP 4.7	Hazardous Chemical Storage		
CEMP 4.7	<p>The key to controlling impacts from hazardous chemicals is to separate chemicals with the environment, and to store chemicals with reactive properties together. The Project will install controls to ensure the safe handling and storage of hazardous chemicals.</p>	<p>Chemicals are stored in the Site compound. A dedicated chemical cabinet houses solvents and paints.</p> <p>Fuels are stored in a bunded shipping container. These fuels are stored in approved</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>Site compounds will prioritise the location of laydown areas in locations which have already been cleared or disturbed and avoid TPZs.</p>	<p>fuel containers and containers are marked for their contents. However, one fuel container was not marked labelling its contents. There is no designated refueling point onsite for mobile plant. There were no signs of spillage at the chemical or fuel storage areas or the site compound.</p> <p>Conclusion OFI - A fuel container in the fuel shipping container was not labelled to show its contents. OFI - Paper copies of SDSs were not available in the fuel shipping container.</p>	
CEMP Appendix 9	<p>Erosion and Sediment Control (surface water) Surface Water and Groundwater procedures</p>	<p>Management Procedures (SWMPs) are recorded in Appendix 9 of the CEMP.</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
EPR SW2	<p>The Contractor, in consultation with ARTC and local Council, must prepare and implement Surface Water Management Procedures (SWMPs).</p> <p>This section details standard controls which can be implemented to mitigate erosion and takes into consideration, EPA publication, 1991: Construction techniques for Sediment Pollution Control; Best Practice Erosion and Sediment Control for Building and Construction Sites' 2008 prepared by the International Erosion Control Association (IECA) and the 'Blue Book' by Landcom 2004. Monitoring and sampling is based on the EPA publication, IWRG 701, sampling and analysis of waters, wastewaters, soils and wastes. Parameters for offsite disposal are based on the Environmental Reference Standards (ERS), 2021. Site specific considerations like, rainfall, flow direction etc, will be shown on SEPs.</p>	<p>Required surface water controls are listed and mapped in the Glenrowan Site Environment Plan and are in accordance with the Surface Water Management Procedures of the CEMP.</p> <p>Key controls observed were:</p> <ul style="list-style-type: none"> • Main discharge is via a swale with a sediment fence and a series of coir logs. Part of the swale is rock lined for stability/erosion control. • Coir logs placed around stormwater entry pits. • Use of portable concrete washout bays 	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>The Contractor, in consultation with ARTC and local Council, must prepare and implement Surface Water Management Procedures (SWMPs).</p>	<ul style="list-style-type: none"> • Stockpiles dosed with polymer to reduce erosion. <p>No sediment was observed in the discharge to the adjacent paddock.</p> <p>No tracking of mud was observed leaving the site.</p> <p>It is noted that the sediment fence does not extend behind the stockpiles as shown in the SEP diagram. The Environment Manager stated that it was not necessary due to minimal risk. Sediment release was not observed to be an issue on the day of the audit. This configuration should be clarified in documentation if the full length is not required.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Conclusion Conformance</p> <p>OFI - The sediment fence at the site compound does not extend behind the stockpiles as shown in the SEP diagram. This configuration should be clarified in documentation if the full length is not required.</p>	
EPR W1	Waste		
EPR W1	The Contractor must develop a Waste Management Plan (WMP), in consultation with ARTC and local Council, which outlines how waste will be managed throughout the project	Waste Management Plan in place. Office waste stream quantities input to sustainability reporting. Waste contractor JJ Richards reports quarterly. The quarterly report is in progress. Dockets have been	Inspection and records check of controls

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>received and will be processed.</p> <p>A concrete washout bay lined with plastic is in use.</p> <p>Waste bins are provided for general waste, mixed recyclables (sorted downstream by JJ Richards) and construction waste. Inspecting these bins, waste segregation was observed to be generally good.</p> <p>Two wheelie bins in the work compound (green and yellow) are unmarked (currently empty).</p> <p>The ISCA six monthly site audit is to be conducted.</p> <p>Reuse practices:</p> <ul style="list-style-type: none"> • Clean but broken wooden rail sleepers are reused for landscaping 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> • Concrete rail sleepers are reused as wheel stops • Cleared vegetation is mulched and reused in landscaping • Concrete waste is taken offsite to Wodonga Recyclers. <p>NGERS reporting is being conducted. Monthly report sent to subcontractors and the data is placed on Workbench software.</p> <p>An annual NGERS report will be submitted to the Clean Energy Regulator in October.</p> <p>Conclusion Conformance</p> <p>OFI - Two wheelie bins in the work compound are unmarked, requiring marking.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 4.8	Traffic		
	<p>Traffic management will be covered in MCD's traffic management plan (TMP) and the plan will be available on site.</p> <p>This plan is referenced in Table 9. Any conditions of the traffic management plan which need to be presented on the SEPs will be added. Key items of note will be:</p> <ul style="list-style-type: none"> • Site access locations • Site speeds • Haul roads • Changes to property access • Sensitive receivers 	<p>A traffic management plan (TMP) has been prepared and is available on site.</p> <p>The Glenrowan SEP contains the required conditions from the TMP</p> <p>Speed limit signage, entry exit signage in place</p> <p>No traffic issues observed on day of audit.</p> <p>Vehicle Management Plan sighted – Inland Rail T2A TRANCHE 1.</p> <p>Conclusion Conformance</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 4.9	Emergency Preparedness		
	<p>MCD will manage emergency response in accordance with MCD’s Emergency Response Plan HSEQ-HSPRO001-Gen-GRP.</p> <p>Emergency contact details will be listed on the SEPs and emergency contacts for each site posted on crib room walls. This will detail the person, their role and their contact information.</p>	<p>Sighted Emergency Response and Incident Management Plan 3- 0013-110-POS0001-0052.</p> <p>Emergency contact details are listed on the Glenrowan SEP and posted on crib room walls.</p> <p>A spill response drill for Quarter 3 will be conducted on 23/6/23.</p> <p>Checked general and oil/fuel spill kits onsite – kits contained full contents and labelled.</p> <p>Conclusion Conformance</p>	<p>Inspection and records check of controls, including spill management.</p>
CEMP 5.0	Monitoring and Inspections		
	<p>Monitoring and Inspections at a program level are detailed in this CEMP Table 23 & Table 24). Aspect specific monitoring requirements are</p>	<p>Monitoring requirements are described in the individual sub-plans.</p>	<p>Checked sample of records providing evidence of</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>described in the individual sub-plans.</p> <p>MCD will undertake environmental monitoring, and retain records relating to the monitoring as detailed in section 5.2. Monitoring parameters are contained in section 5.2 of this plan or in the appropriate sub-plan for aspect specific activities (Air, Noise, Vibration etc).</p> <p>The Contractor must undertake additional monitoring at the direction of ARTC in response to Environmental Events, complaints, non-compliances or a change in the MCDs Activities.</p>	<p>Conclusion Conformance</p>	<p>required inspections and monitoring</p>
CEMP 5.5	Event Reporting and Investigation		
	<p>All events, including near misses will be reported and managed in accordance with MCD Management System requirements. Where an event has occurred on site, the Construction Manager shall be notified immediately, who will inform the Project Director and the Environmental Manager.</p> <p>MCD will notify ARTC in accordance with the Environmental Event management process,</p>	<p>Incident reports including near misses are logged in ArcGIS.</p> <p>Single environmental incident reported for a concrete pour spill 21/3/23, item 202303211502. Spill into a side track drain. A bund was created and there was no offsite impact. Closed out</p>	<p>Check sample of records providing evidence of event reporting and investigation</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>where an actual or potential material or serious environmental harm event has been identified. (Appendix 8)</p> <p>Events shall be initially classified to determine the level of notifications and investigation required as per Table 25.</p> <p>Whilst determining classification, it is imperative that both the actual and potential outcomes of the event are considered.</p> <p>MCD will ensure that all environment related events are investigated to determine causes of the incident.</p> <p>Contributing factors and the root cause(s) will be established. MCD may use the SAI360 investigation process if deemed necessary. Reports and event reports will be kept for a minimum of 5 years.</p> <p>Immediate actions will be taken to prevent any further damage. Corrective actions will be established based on investigation findings and will be actioned as soon as reasonably practicable to prevent recurrence.</p>	<p>31/3/23. Spills of greater than 20 litres are listed as incidents. Smaller spills are listed as hazards.</p> <p>Checked two recent hazard spills, both on 19/6/23. Hydrocarbon spills less than 20 litres. Spill covered with absorbent material, scraped, bagged and the material placed in the Cat D soil area. A specialist waste contractor will collect the material. Both hazards closed out on 19/6/23.</p> <p>Conclusion Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 5.6	Audits		
	<p>The Environment & Sustainability Manager will initiate and implement scheduled internal and external audits for each phase of the Project. Additional audits will be programmed if a product or system non-conformance within the Project raises significant areas of concern. A copy of all audit's reports, including the non-conformances with corrective and preventive actions will be provided to the Client...</p> <p>The Project audit schedule (2004-MCD-PRW-QAC-SCH-0001) will program audits ensuring the Project meets compliance with audit timeframes.</p> <p>ARTC audits will be undertaken within 6months of the date of deed and then at least once within each 12month period after the date of the deed.</p>	<p>Audit Schedule 2004-MCD-PRW-QAC-SCH-001, is referred to in the CEMP. This document is not the correct audit schedule – should be audit schedule 2069-MCD-PRW-QAC-SCH-0001 See Section 4.5 Audits</p> <p>Checked audit schedule 2069-MCD-PRW-QAC-SCH-0001 Inland Rail Project Audit Schedule 7.06.2023.</p> <p>Internal audits. Checked HSEQ Internal Audit ID:20230508102.31 May 2023</p> <p>The audit found a number of environmental issues requiring actions - Findings 26511, 26512, 26516, 26518, 26522, 26527.</p>	<p>Records check Audit schedule</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Audit findings have been actioned and closed out or scheduled for close out.</p> <p>Conclusion Conformance OFI - The project audit schedule referred to in the CEMP (2004-MCD-PRW-QAC-SCH-0001) has a different reference to the schedule provided (2069-MCD-PRW-QAC-SCH-0001). The CEMP should be updated accordingly.</p>	
CEMP 5.7	Continuous Improvement		
	<p>Continual improvement is at the forefront of MCD organization. It is embodied in the objectives and quality policy.</p> <p>Some of the methods for driving continual improvement have been discussed in detail throughout this management plan, such as internal audits, self-assessments, lesson learnt</p>	<p>Lessons learnt are kept in the Environmental Risk Assessment Rev D 26/5/23 – checked list of lessons learnt.</p> <p>An Occupation Lessons Learnt Workshop was held on 23/3/23.</p>	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>and management review. Along with these methods, MCD will use the results of customer feedback to drive continual improvement measures.</p> <p>As part of the continuous improvement process, lesson learnt workshops will be conducted as they are identified through the course of the Project execution.</p>	<p>Conclusion Conformance</p>	
CEMP 6.1	Communication of Environmental Information		
	<p>All personnel (inclusive of MCD subcontractors) shall receive training of a type and level of detail that is appropriate for their role. At a minimum, all personnel working at site will be given a Project induction prior to commencing any work.</p> <p>Other types of mechanisms of covering environmental awareness are through HSEQ alerts and more specialised training. For all training provided by the Project, attendance records and assessments of training will be maintained by the HSE admin. This information is stored in the project induction/training matrix.</p>	<p>Checked project induction presentation material.</p> <p>The material covered Green rules, hazardous substances and water management.</p> <p>However, the induction material did not cover all the aspects listed in the CEMP induction requirements such as air quality and biosecurity.</p> <p>Checked sample of daily bulletins. Bulletin issued for 20/6/23 included fauna handling.</p>	<p>Records check</p> <p>Induction Air</p> <ul style="list-style-type: none"> -Specifics of air quality, dust and emissions management, including high risk works -Specific commentary on sensitive receivers <p>Flora Fauna</p> <ul style="list-style-type: none"> -Specifics of habitat protection, including

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Checked Pre-start forms for 18/4/23, 28/4/23 and 19/5/23. Forms completed and cover environmental considerations. Checked daily project bulletins for 5/7/23 (Moving Rail) and 4/7/23 (Lifting and Slings)</p> <p>Interviewed an Environmental Engineer and a Site Supervisor. Both demonstrated an adequate knowledge of key environmental impacts and controls, the Site Environmental Plan and incident reporting.</p> <p>Conclusion MiNC - Project induction material did not cover all the aspects listed in the CEMP induction requirements, missing aspects such as air quality and biosecurity.</p>	<p>activities restricted from NGZs</p> <p>-Specific information on PAZs including restricted activities Specific locations of threatened flora or fauna and associated controls</p> <p>Tree Protection</p> <p>-Specifics of tree protection, including activities restricted from TPZs.</p> <p>-Specific locations of trees to avoid or protect</p> <p>Biosecurity</p> <p>-Specifics of biosecurity, including activities restricted from biosecurity NGZs</p> <p>-Specific locations of weeds to avoid</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 6.2	Reporting		
	<p>Compliance reporting requirements are detailed in section 5 of this report. Specific environmental reporting requirements associated with the Project contract and expectations are:</p> <p>Monthly reporting to ARTC. The monthly report shall be submitted to ARTC within 5 business days of the end of month and include (but not limited to)</p> <ul style="list-style-type: none"> • The D&C Contractor’s updates to their respective CEMP and subplans. • Compliance status of requirements of any obligations obtained for activities as part of the D&C Contractor’s activities and the works. • Completed site inspections, including number of inspections completed and open and closed corrective actions raised and completed. • Summary of environmental events for the month and open and closed corrective actions 	<p>Reporting requirements:</p> <ul style="list-style-type: none"> • Monthly reporting is being carried out. Sighted monthly reports for March 2023 and May 2023. Monthly reports sampled, contained required elements. • As part of this reporting an updated Obligations Register (sighted) is submitted. Checked Obligations Register (Review Date 13/2/23) The Register noted compliance with all obligations. <p>It is noted that internal HSEQ audits have generated some minor non-compliance findings. The auditee stated</p>	<p>Records check</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>and lessons learned.</p> <ul style="list-style-type: none"> • Pre-clearance surveys completed including details of the monthly and cumulative totals of vegetation that has been cleared and fauna spotter/ catcher reports. • Waste classification, volumes and destinations (all recorded evidence and provided monthly). Environmental monitoring in accordance with CEMP and any other relevant standard or statutory requirement, where required. • Details of complaints and resolution. • Details of any inspections undertaken by regulators. • Details of any internal audits conducted, audit findings and corrective actions. • Positive environmental outcomes achieved, opportunities for improvement and lessons learned identified and implemented by the D&C Contractor. • Next month's key areas of focus for upcoming works/ compliance requirements e.g. reports/audits etc 	<p>that they are not listed in the Obligations Register as they were closed out at the time of the register review.</p> <p>Conclusion Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Key activities 		
CEMP 7.1	Top Management Review		
	<p>EXCO may include the Project in their regular review of the organisation’s environmental management system to ensure its continuing suitability, adequacy and effectiveness.</p> <p>The 12 monthly EXCO review includes consideration of:</p> <ul style="list-style-type: none"> • The status of actions from previous management reviews. • Changes in: <ul style="list-style-type: none"> - External and internal issues that are relevant to the environmental management system. - The needs and expectations of interested parties, including compliance obligations. - Its significant environmental aspects. - Risks and opportunities. - The extent to which environmental objectives have been achieved. 	<p>The EXCO review has not been completed yet.</p> <p>Conclusion Not able to be audited</p>	<p>Records check</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> - Information on the organisation’s environmental performances, including trends in: - Nonconformities and corrective actions. - Monitoring and measurement results. - Fulfilment of its compliance obligations. - Audit results. • Adequacy of resources. • Relevant communication(s) from interested parties, including complaints. • Opportunities for continual improvement. 		
CEMP 7.2	Project Management Review		
	<p>Review of the implementation and effectiveness of this plan and associated documents will be performed on an annual basis as minimum, by the Project management team. The responsibility for this review lies with the Project Manager.</p> <p>The review will include:</p> <ul style="list-style-type: none"> • Progress of the implementation of this plan. • Effectiveness of this plan. 	<p>Review not completed yet.</p> <p>Conclusion Not able to be audited</p>	<p>Records check</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Adequacy of resources. • Effectiveness of training and training requirements. • Results of inspections and audits. • Critical non-conformances or repeated non-conformances. • Overall performance against environmental compliance obligations. • Organisational changes, changes to legislation and other obligations. <p>Records of the review will be recorded on Minutes of Meeting (Doc# COR-GNG-FRM001-GEN-GRP). Any actions arising will be recorded in the Actions module of the CMO database</p>		
CEMP 8.0	Lessons Learnt		
	<p>Lessons learnt and continued improvement is detailed in this CEMP. A snapshot lessons learnt summary is included as Appendix 5. This will be updated as the Project progresses, and learnings are identified.</p> <p>MCD, as part of the continual improvement</p>	<p>See CEMP 5.7 Continuous Improvement.</p> <p>Conclusion Conformance</p>	<p>Records check</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>process will review the efficacy of environmental compliance as detailed in this document and capture lessons within the lessons learnt register.</p>		

Findings

MiNCs and OFIs identified during the audit are listed in the table below.

Findings
<p>CEMP 1.5 Roles and Responsibilities</p> <p>MiNC - Requirement PSR 6.3.23, requires a standalone Sustainability Manager. At present this role is currently combined with the Environmental Manager role. This issue has not been resolved.</p>
<p>CEMP 2.6 SEPs</p> <p>OFI - For the air quality monitoring label on the SEP plan, suggest adding 'noise' as well, as noise is also covered by plan.</p>
<p>CEMP 4.2 Noise and Vibration</p> <p>OFI - A number of recent short term noise exceedences were missing explanations.</p>
<p>CEMP 4.7 Hazardous Chemical Storage</p> <p>OFI - A fuel container in the fuel shipping container was not labelled to show its contents.</p> <p>OFI - Paper copies of SDSs were not available in the fuel shipping container.</p>
<p>CEMP Appendix 9, Erosion and Sediment Control</p> <p>OFI - The sediment fence at the site compound does not extend behind the stockpiles as shown in the SEP diagram. This configuration should be clarified in documentation if the full length is not required.</p>

Findings
<p>EPR W1 Waste Management</p> <p>OFI - Two wheelie bins in the work compound are unmarked, requiring marking.</p>
<p>CEMP 5.6 Audits</p> <p>OFI - The project audit schedule referred to in the CEMP (2004-MCD-PRW-QAC-SCH-0001) has a different reference to the schedule provided (2069-MCD-PRW-QAC-SCH-0001). The CEMP should be updated accordingly.</p>
<p>CEMP 6.1 Communication of Environmental Information</p> <p>MiNC - Project induction material did not cover all the aspects listed in the CEMP induction requirements, missing aspects such as air quality and biosecurity.</p>