

## Wangaratta, Glenrowan & Murray Valley Highway Enhancement Site – CEMP audit November 2023

|                                |  |                            |   |
|--------------------------------|--|----------------------------|---|
| <b>Site Name</b>               | Wangaratta, Glenrowan and Murray Valley Highway (MVH) Enhancement Sites.   | <b>Project Manager (s)</b> | Tom Foley   |
| <b>Audit Physical Location</b> | Wangaratta, Glenrowan and Murray Valley Highway  | <b>Senior Manager (s)</b>  | Miguel Reyes – Construction Manager<br>Peter Lacki – Senior Project Engineer  |
| <b>Audit Date</b>              | 15-16.11.2023  | <b>Auditor (s)</b>         | Mark Nan Tie – Accent Environmental. Independent Environmental Auditor  |
| <b>Entity being Audited</b>    | McConnell Dowell – RSD Australia   | <b>Auditee</b>             | Steve Eeles – McConnell Dowell Environment and Sustainability Manager<br>Natali De Carvalho – McConnell Dowell-Environmental and Sustainability Advisor |
| <b>Reference</b>               | AE1221   | <b>Version</b>             | V1.0 Final  |
| <b>Reviewed by</b>             | Michael Cramer – Accent Environmental  | <b>Approved by</b>         | Michael Cramer – Accent Environmental   |
| <b>Audit Objective</b>         | 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. |                            |   |
| <b>Audit Scope</b>             | Wangaratta, Glenrowan and Murray Valley Highway Enhancement Sites.   |                            |   |

|  |   |
|--|---|
| <b>Audit Criteria</b>                      | Construction Environmental Management Plan and associated subplans, Environmental Management Framework, relevant PSRs and conditions of project approvals.  |
| <b>Abbreviations used in this document</b> | OFI – Opportunity for further improvement<br>MiNC – Minor Non Conformance<br>MNC – Major Non Conformance  |
| <b>Introductory Notes</b>                  | <p>At present the Glenrowan Enhancement site is focussed on the construction of the main bridge.</p> <p>The Wangaratta site is approximately 50% progressed with precast elements being installed under the track.</p> <p>At the Murray Valley Highway site, works are very close to completion.</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<br><br>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> <p>a) Inland Rail’s Environmental Management System; and<br/>b) the Construction Environmental Management Plan for the Works.</p>           | <p><b>Conclusion</b></p> <p>Conformance</p>  | <p>Record of EMS online<br/>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. The objectives and performance criteria are shown in Table 6.</p> <p>Targets relevant to this plan include:</p> | <p>Site inspection and checked incident reports.<br/>No material damage observed.<br/>No infringements from regulators.<br/>Compliance with monitoring, sample of records.</p> | <p>Records check<br/>Complaints log</p>                             |

| No. | CEMP Requirements   | Audit comments and findings  | Evidence |
|-----|---|--|----------|
|     | <ul style="list-style-type: none"> <li>• Avoid causing damage from activities that result in negative environment and sustainability outcomes</li> <li>• Zero infringements from regulators</li> <li>• Achieve 100% compliance with monitoring requirements as outlined in this plan</li> <li>• Achieve 100% notification compliance to stakeholders and the community</li> <li>• Respond to any community complaints within 48 hours.</li> </ul> | <p>Community notifications. Last audit - record of notification for night works 27/6/23. Ongoing notifications - Last notification was for Wangaratta September 2023 occupation – Temporary alternative accommodation offer for 22-27 September 2023.</p> <p>Since last audit. 3 complaints Wangaratta 19.07.23<br/>Complaint of palm tree damage during works causing a lean over of another palm tree. Responded same day. Investigated by arborist. Lean of palm not related to works. Closed out 30.8.23.</p> <p>Wangaratta 10.10.23. Daytime truck noise. Noise cancelling headphones offered. Closed out 10.10.23</p> <p>Wangaratta 24.10.23. Trucks</p> |          |

| No.                              | CEMP Requirements   | Audit comments and findings   | Evidence   |
|----------------------------------|---|---|--|
|                                  |   | <p>using road at front of house. Responded 25.10.23. Haulage route changed. Closed out 25.10.23.</p> <p><b>Conclusion</b><br/>Conformance</p>   |  |
| CEMP1.5                          | Roles and Responsibilities  |   |  |
| <p>CEMP 1.5</p> <p>PSR 6.1.2</p> | <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 graduate rotation). Further support is provided by an external consultant for climate change risk and energy assessment. Regional sustainability support is provided from MCD corporate. The team including</p> | <p>Check of resources and qualifications for key personnel</p> |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>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 are still considerable.</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 change has been made and reflected in the latest version of the CEMP.</p> <p>Requirement PSR 6.3.23, requires that a standalone Sustainability Manager be</p> |          |

| No. | CEMP Requirements   | Audit comments and findings   | Evidence |
|-----|---|---|----------|
|     |   | <p>appointed.<br/>           Currently the environmental Manager is also undertaking the Sustainability Manager 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><b>Conclusion</b></p> <p><b>MiNC</b></p> <p><b>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. (Carry over from audit 20/6/23)</b></p> |          |
| 1.6 | Relationship with other documents - Environmental Framework |   |          |

| No.                             | CEMP Requirements   | Audit comments and findings  | Evidence                  |
|---------------------------------|---|--|---------------------------|
| Incorporates PSR 6.1.7, EMF 1.3 | Environmental Framework, including: <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• Environmental Risk Assessment (ERA)</li> <li>• Issue-Specific Sub Plans</li> <li>• Environmental Green Rules</li> <li>• Site Environmental Plans</li> <li>• Environmental Protection Instructions</li> </ul> | Checked MCD MMS system and all framework elements in place.<br>Checked sample of environmental green rules and environmental safety instructions<br><br><b>Conclusion</b><br>Conformance   | Framework elements online |
| <b>CEMP 2.4, 2.5</b>            | <b>Risk and Opportunity Identification<br/>Environmental Aspects and Impacts</b>  |  |                           |
| CEMP 2.4, 2.5 and EMF3          | 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.<br><br>The ERA register defines key environmental aspects and the associated impacts from works.                     | Checked MCD MMS system.<br>A 'live' ERA is in place defining key environmental aspects and impacts. Last updated 26/5/23. No additional risks have been identified since last audit. There will be an upcoming six-monthly review.<br><br><b>Conclusion</b><br>Conformance | 'Live' ERA on system      |



| No.                              | CEMP Requirements  | Audit comments and findings   | Evidence                                   |
|----------------------------------|--|---|--|
| 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"> <li>• Overarching environmental commitment/obligation</li> <li>• Green rules</li> <li>• Contact</li> <li>• Written summary of environmental aspects specific to each site, with an overarching risk rating</li> <li>• Must statements for each aspect</li> <li>• Hazard identification reporting process</li> <li>• Community complaints notification process</li> <li>• Emergency response process</li> <li>• Maps showing: <ul style="list-style-type: none"> <li>o Location of controls</li> <li>o Location of no-go areas</li> <li>o Location of items of significance</li> <li>o Sensitive receivers if present</li> <li>o Stockpile locations</li> </ul> </li> </ul> | <p>Each enhancement site has a Site Environmental Plan (SEP).<br/>Wangaratta SEP (Rev C)<br/>Glenrowan (Rev H)<br/>MVH (Revision Date 14/11/23)<br/>All required elements are detailed in each SEP.<br/>Wangaratta SEP – some vegetation retention zones need updating.</p> <p><b>Conclusion</b><br/>Conformance</p> <p><b>OFI – Wangaratta SEP. Some vegetation retention zones need updating.</b></p> | <p>Check of SEP requirement compliance</p> |

| No.  | CEMP Requirements  | Audit comments and findings  | Evidence  |
|--|--|--|---|
|  | o Site compound locations  |  |   |
| CEMP 3.1,<br>3.2                               | Legislation<br>Policies, Guidelines and Other Relevant Documents   |  |   |
| CEMP 3.1,<br>3.2<br>incorporating<br>PSR 6.1.6 | <p>The legal requirements relevant to the scope of this Plan are detailed in Table 12</p> <p>The policy and guideline requirements relevant to the scope of this Plan are detailed in Table 13.</p>  | <p>Checked MCD MMS system. MCD regulator and obligations register (revision K). Legal requirements and other obligations are comprehensively covered and kept updated (last updated 7/7/23). No non-compliant items listed.</p> <p><b>Conclusion</b><br/>Conformance</p> | <p>Check of legal and other requirements register</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;</p> | <p>Checked Sustainability management plan. (Revision 2 20/4/23, Revision 3 being finalised). Contains required elements.</p> <p>Two external audits have been conducted with one being</p>   | <p>Checked implementation of current plan, Revision 2</p> |

| No. | CEMP Requirements            | Audit comments and findings   | Evidence |
|-----|------------------------------|---|----------|
|     | [plus requirements c) to o)] | <p>completed with the design stage. ISP reviews have been conducted quarterly. Checked ISP review 13/7/23 and 11/10/23. No nonconformances, Otherwise, several minor opportunities for improvement.</p> <p>Project reporting.<br/>Checked MCD monthly reporting spreadsheet. It showed sustainability targets on track.</p> <p>Checked October 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 an Excellence benchmark.</p> <p><b>Conclusion</b><br/>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. 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><u>Glenrowan</u></p> <p>As reported in the previous audit, 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 9<sup>th</sup> Feb 2023) 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>At stage 3b of plan.</p> | <p>Check of secondary approvals</p> |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>Endorsed by HV – checked record of 2/11/23.<br/>Arch Mgt Plan 30/10/23.<br/>There are 5 stages – Still currently at stage 3 for the Glenrowan bridge demolition and construction. It includes processes for dealing with unexpected finds.<br/>Endorsed by HV – checked record of 15/6/23.</p> <p>An unexpected find occurred during Glenrowan Stage 3. A number of 1850s bottles found. GML present - supervised excavation.<br/>Heritage overlay for Overhead Site – desktop assessment done, I R Planning Assessment OH 1060-1076, Stage 2.<br/>Meeting with Council confirmed no planning permit required.</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><u>Wangaratta</u></p> <p>Wangaratta Heritage Permit P34386. Condition complied with to facilitate works.</p> <p>Unexpected finds process utilized for several finds since last audit.</p> <p>CHMP 17401 Wangaratta sighted. (See Section 4.5 Heritage)</p> <p>IFC plans endorsed.</p> <p>Exemptions from Heritage Permit gained for conduit installation 21/7/23.</p> |          |

| No.                     | CEMP Requirements  | Audit comments and findings  | Evidence |
|-------------------------|--|--|----------|
|                         |  | <p><b>Conclusion</b><br/>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. Also, Seymour being set up.</p> <p>Checked Habitat zone clearing tracker, Sept 2023. Total amount approved for clearing 24.62 Ha. 1.11 Ha vegetation cleared (none EPBC listed). Total avoided 3.05 Ha.</p> <p><b>Conclusion</b><br/>Conformance</p> |          |
| 4.1                     | Air  |  |          |

| No.      | CEMP Requirements   | Audit comments and findings   | Evidence  |
|----------|---|---|---|
| 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"> <li>• Assess the risk of construction related changes to air quality;</li> <li>• Provide strategies to control potential air quality impacts during construction;</li> <li>• Address approval, permit/ license and contractual requirements;</li> <li>• Monitor for compliance with this management plan</li> </ul> <p>Construction Environment Management Plan<br/>INLAND RAIL: Tottenham to Albury Tranche 1 EDA &amp; D&amp;C Phases Page   52</p> <ul style="list-style-type: none"> <li>• Apply contingency measures in the instance of an exceedance; and</li> <li>• Report on findings, exceedances and incidents to support continual improvement</li> </ul> | <p>The subplan contains the required elements listed in the CEMP.</p> <p>Wangaratta.<br/>Real time monitoring is in place for PM10 and PM 2.5. Checked dust monitoring results since last audit, June 2023. Compliant. All spikes explained (e.g. residents' chimneys).</p> <p>Glenrowan - as above</p> <p>Environmental Controls<br/>Environmental staff report that as dust has not been an issue at any of the sites, 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>Inspection and records check of sub plan</p> |



| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>Site inspection – No dust issues evident.</p> <p>Wangaratta - Water cart observed on site.</p> <p>Street sweeping in the Wangaratta precinct occurring. Also, FOD mats (portable rumble grids) installed at the exit.</p> <p><u>All sites</u></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"> <li>• Vehicle prestart</li> <li>• Vehicle inspections conducted for first time on site</li> </ul> <p>Regular inspections are made including visual daily. Weekly inspections include dust from roads/stockpiles and plant &amp;</p> |          |

| No. | CEMP Requirements | Audit comments and findings  | Evidence |
|-----|-------------------|--|----------|
|     |                   | <p>machinery.<br/>           Checked weekly inspections (93% completion since start of works at all sites, some not undertaken due to lack of works)<br/>           No diesel smoke of greater than 10 seconds observed.<br/>           Checked two inspection reports.9/11/23 Wangaratta, 3/11/23 Glenrowan.</p> <p>Site Specific Control Measures in the air quality management sub – plan:</p> <p>Community Engagement</p> <ul style="list-style-type: none"> <li>• Community notifications undertaken</li> <li>• Site information board displays contacts</li> <li>• Complaint process in place</li> </ul> |          |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>Scheduling</p> <ul style="list-style-type: none"> <li>Scheduling to minimize dust impacts on high wind days has not been necessary according to MCD as dust has not been an issue</li> </ul> <p>Planning</p> <ul style="list-style-type: none"> <li>Planning vehicle movements, routes etc. has not been necessary according to MCD as dust has not been an issue</li> </ul> <p>Barriers</p> <ul style="list-style-type: none"> <li>Obstructing the path of dust transmission has not been necessary according to MCD as dust has not been an issue.</li> <li>Rumble grids installed.</li> </ul> <p>Engineering controls</p> |          |

| No.      | CEMP Requirements  | Audit comments and findings   | Evidence  |
|----------|--|---|---|
|          |  | <ul style="list-style-type: none"> <li>• Temporary stabilization using polymer mixtures has been undertaken.</li> <li>• Water carts used as required.</li> <li>• Street sweeping underway in Wangaratta and Glenrowan</li> <li>• Regular inspections made (formal weekly)</li> </ul> <p><i>Conclusion</i><br/>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).</p> <p>Included in the plan are controls to address the</p> | <p>The construction noise and vibration management plan (5-0013-110-PES-00-PJ-0003) includes required listed elements.</p> <p>Communication with</p>  | <p>Inspection and records check of sub plan</p> |

| No. | CEMP Requirements   | Audit comments and findings   | Evidence |
|-----|---|---|----------|
|     | <p>following.</p> <ul style="list-style-type: none"> <li>• Out of Hours work must meet the weekend/evening work hours and night period noise guideline targets (see EPA 1834) unless approved by ARTC</li> <li>• Details on the location and type of sensitive receiver</li> <li>• 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</li> <li>• Proactive vibration monitoring undertaken during high-risk activities vibration activities detailed in the CNVMP</li> <li>• Proactive noise monitoring undertaken during high-risk activities noise activities detailed in the CNVMP</li> <li>• Proactive noise modelling undertaken of high-risk activities prior to activities being carried out</li> <li>• Communication to neighbouring sensitive receptors on upcoming high-risk activities as per CMP</li> <li>• Unsealed roads will be graded regularly. Sealed</li> </ul> | <p>neighboring sensitive receivers. September 2023 occupation – relocation notification Wangaratta – sighted.</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<br/>There has been one complaint re noise. See Objectives and Targets.</p> <p>Checked real time monitoring November 2023<br/>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</p> |          |

| No. | CEMP Requirements   | Audit comments and findings  | Evidence |
|-----|---|--|----------|
|     | <p>access roads and hardstand areas shall have potholes filled in a timely fashion</p> <ul style="list-style-type: none"> <li>• Alternate timing of works to avoid noise sensitive times</li> <li>• Schedule noisy activities in least noise sensitive times</li> <li>• Night-time construction traffic shall be redirected away from noise sensitive receivers, in accordance with the Construction Traffic Management Plan</li> <li>• Appropriate construction traffic speed limits shall be established and enforced near noise sensitive receivers</li> </ul> | <p>up. No exceedences reported for construction noise. Checked Wangaratta exceedance 15 November 2023. Noise identified as people talking.</p> <p>Noisy activities are programmed for the daytime period.</p> <p>Construction speed limits have been established.</p> <p>Checked Wangaratta vibration monitoring for monitoring point HEGEWO for vibration levels during November 2023. No exceedences.</p> <p>A number of recent short-term noise exceedences were missing explanations.</p> <p><i>Conclusion</i><br/><b>OFI - A number of recent</b></p> |          |

| No.      | CEMP Requirements   | Audit comments and findings  | Evidence  |
|----------|---|--|---|
|          |   | <b>short-term noise exceedences were missing explanations. (Carry over from audit 20/6/23)</b>   |   |
| 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 ecological aspects:</p> <ul style="list-style-type: none"> <li>• The flora and fauna management plan (3-0013-110-PVP-00-PJ-0008) provides: <ul style="list-style-type: none"> <li>o A detailed approach to managing flora and fauna.</li> <li>o Detail on the location and type of threatened species found within the project</li> <li>o Details on the establishment and maintenance of NGZ to prevent impacts on protected species</li> <li>o Details on the results of pre-construction investigations</li> <li>o Process for the management of injured, orphaned or deceased animals</li> <li>o Process for avoiding and minimizing impact to</li> </ul> </li> </ul> | <p>Checked flora and fauna management plan (Doc 3-0013-110-PVP-00-PJ-0008)</p> <p>The plan contains required elements.</p> <ul style="list-style-type: none"> <li>• Objectives and targets are being met.</li> <li>• Pre-Clearance Assessment 5/12/22 conducted by Habitat Management Services.</li> <li>• Vegetation Disturbance Permit IRT2A checked. Fauna Interaction Register checked since June e.g. lizards/snakes</li> </ul> | <p>Inspection and records check of sub plan</p> |

| No. | CEMP Requirements   | Audit comments and findings   | Evidence |
|-----|---|---|----------|
|     | <p>remnant native vegetation</p> <ul style="list-style-type: none"> <li>o Details of suitably qualified ecologists</li> <li>o Outline controls to minimize light and noise impacts on nocturnal animals</li> <li>o Details on how to minimize impact on species during breeding season</li> <li>o Details on the tree clearing process               <ul style="list-style-type: none"> <li>• The Tree management plan (5-0013-110-ESS-00-PJ-0010) provides</li> </ul> </li> <li>o Specifics for protecting trees on site as well as the tree clearing process.</li> <li>o Details on how to and where to install NGZ fencing and TPZ fencing</li> <li>o Details of suitably qualified arborists</li> <li>o Opportunities for re-use</li> </ul> | <p>moving across site.<br/>149 interactions across all sites.<br/>Striped legless lizard survey conducted by Habitat Services Pty Ltd., O/H site 1088.</p> <ul style="list-style-type: none"> <li>• Vegetation removal tracker checked.</li> <li>• No amphibian areas.</li> <li>• No avian control measures required yet.</li> </ul> <p>Other threatened species matters:</p> <ul style="list-style-type: none"> <li>• No Golden Sun moths found.</li> <li>• No threatened fauna matters evident to date.</li> </ul> <p>Tree Protection Management Plan</p> <ul style="list-style-type: none"> <li>• Objectives and targets are being met.</li> </ul> |          |



| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <ul style="list-style-type: none"> <li>• Vegetation Disturbance Permit gained.</li> <li>• GIS layer used to track impacts on trees.</li> <li>• TPZs are shown in the Glenrowan Site. Environmental Plan with 1 m added to footprint as per requirements. TPZs shown in the Wangaratta SEP. At MVH, TPZs have been taken down.</li> <li>• TPZs are inspected weekly as per TMP requirement.</li> </ul> <p>Checked weekly inspections<br/>           2/11/23 MVH<br/>           25/10/23 MVH<br/>           9/10/23 Wangaratta<br/>           22/9/23 Wangaratta<br/>           24/9/23 Glenrowan<br/>           18/9/23 Glenrowan. Action to</p> |          |

| No.      | CEMP Requirements | Audit comments and findings   | Evidence |
|----------|-------------------|---|----------|
|          |                   | <p>label a container in chemical storage cabinet closed off – checked.</p> <p>Wangaratta.<br/>Inspected Tree Protection Zones (TPZ). All constructed as per Site Environmental Plan and in good order.</p> <p><b>Conclusion</b><br/>Conformance</p> |          |
| CEMP 4.4 | Biosecurity       |   |          |

| No.      | CEMP Requirements   | Audit comments and findings  | Evidence  |
|----------|---|--|---|
| 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>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. No fauna found in open pits since last audit.</p> <p>MVH – no significant issues re weeds. Some Patterson Curse to be removed.</p> <p><b>Conclusion</b><br/>Conformance</p> | <p>Inspection and records check of sub plan</p> |
| CEMP 4.5 | Heritage  |  |   |

| No.      | CEMP Requirements  | Audit comments and findings   | Evidence                              |
|----------|--|---|---------------------------------------|
| 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>Glenrowan - Voluntary CHMP 17752 in place, Andrew Long and Associates- sighted. Also sighted letter notification to commence 27/9/22.</p> <p>Wangaratta - CHMP 17402 sighted.</p> <p>MVH – no CHMP required</p> <p>CHMP induction program is a 13 minute video produced in conjunction with the Yorta Yorta people.</p> <p>Wangaratta CHMP conditions checked- compliant.</p> <p>Wangaratta Heritage Permit 34386 Stage 3, Site H1595. Archaeological Management Plan Rev 3b is in place.</p> <p>Glenrowan Heritage Precinct VHR H2000 Stage 3</p> | Inspection and records check of plans |

| No.      | CEMP Requirements   | Audit comments and findings   | Evidence                                 |
|----------|---|---|--|
|          |   | Archaeological Management Plan is in place.<br><br><b>Conclusion</b><br>Conformance   |  |
| CEMP 4.6 | Contamination   |   |  |
| CEMP 4.6 | 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. | CL&SMP (5-0013-110-PES-00-PJ-0001) is in place.<br><br>Checked material tracking register.<br><br>Unexpected contaminated soil finds at Wangaratta and Glenrowan.<br>Asbestos Telstra pit at Glenrowan.<br>Suspected dumping at Wangaratta.<br>Licensed contractor North East bagged insulation and asbestos.<br>Logged on hazard reporting | Inspection and records check of sub plan |

| No. | CEMP Requirements | Audit comments and findings  | Evidence |
|-----|-------------------|--|----------|
|     |                   | <p>system -checked Wangaratta report.</p> <p>Glenrowan.<br/>The soil stockpile onsite contains Category D soil. The stockpile has relevant signage. It has been polymer dosed to prevent erosion.</p> <p>Wangaratta.<br/>Cat D stockpile - not treated yet. Signage in place. No erosion issues.</p> <p>A Site Material Movement Plan to track contaminated soils has been prepared.<br/>Weekly inspection checklist includes contaminated soil.</p> <p>MVH - Cat D from below tracks used in levees September 2023. All remained on site. Checked Site Material</p> |          |

| No.      | CEMP Requirements   | Audit comments and findings  | Evidence                                 |
|----------|---|--|--|
|          |   | Movement Plan.<br><br><b>Conclusion</b><br>Conformance   |  |
| 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>Site compounds will prioritise the location of laydown areas in locations which have already been cleared or disturbed and avoid TPZs.</p> | <p>Glenrowan.<br/>Chemicals are stored in the Site compound. A dedicated chemical cabinet houses solvents and paints.<br/>Fuels are stored in a banded shipping container. These fuels are stored in approved fuel containers and containers are marked for their contents.<br/>There were no signs of spillage at the chemical or fuel storage areas or the site compound.</p> <p>Wangaratta.<br/>Flammable Liquids cabinet – checked. Printed SDSs – while most were printed with a 2023 date, a number of SDSs were</p> | Inspection and records check of controls |

| No.             | CEMP Requirements  | Audit comments and findings  | Evidence                                 |
|-----------------|--|--|--|
|                 |  | <p>undated.</p> <p>MVH<br/>Chemicals and fuels stored in a sealed shipping container. Paper copies of SDSs not available.</p> <p><b>Conclusion</b><br/>Conformance</p> <p><b>OFI – A number of paper copies of SDSs were not available in the fuel shipping container (MVH site).</b></p> <p><b>OFI – A number of paper copies of SDSs were not dated in the Wangaratta Flammable Liquids cabinet.</b></p> |  |
| CEMP Appendix 9 | Erosion and Sediment Control (surface water)<br>Surface Water and Groundwater procedures | Management Procedures (SWMPs) are recorded in Appendix 9 of the CEMP.<br>Required surface water  | Inspection and records check of controls |



| 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>The Contractor, in consultation with ARTC and local Council, must prepare and implement Surface Water Management Procedures (SWMPs).</p> | <p>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"> <li>• 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.</li> <li>• Coir logs placed around stormwater entry pits.</li> <li>• Use of portable concrete washout bays.</li> <li>• Stockpiles dosed with polymer to reduce erosion.</li> </ul> <p>No sediment was observed</p> |          |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>in the discharge to the adjacent paddock.<br/>No tracking of mud was observed leaving the site.</p> <p>Wangaratta site- No sediment was observed in the discharge.<br/>However, coir logs had been moved away from the discharge point and thus would not be effective.<br/>No tracking of mud was observed leaving the site.</p> <p>MVH site – no sediment/erosion issues evident. A portable rumble grid is in place at the exit.</p> <p><b>Conclusion</b><br/><b>MiNC – Coir logs had been removed from the discharge</b></p> |          |

| No.    | CEMP Requirements  | Audit comments and findings   | Evidence  |
|--------|--|---|---|
|        |  | <b>point at Wangaratta.</b>   |   |
| EPR W1 | Waste  |   |   |
| EPR W1 | <p>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</p> | <p>Waste Management Plan in place.</p> <p>Waste stream Register – checked. Diversion rate 51%<br/>Office waste stream quantities input to sustainability reporting. Waste contractor JJ Richards reports quarterly.</p> <p>A concrete washout bay lined with plastic is in use at Glenrowan.</p> <p>Wangaratta makes use of concrete washout bags.<br/>At MVH, steel washout bins were used (concreting completed now).</p> <p>Glenrowan and Wangaratta.<br/>Waste bins are provided for general waste, mixed</p> | <p>Inspection and records check of controls</p> |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>recyclables (sorted downstream by JJ Richards) and construction waste. Inspected bins - waste segregation was observed to be generally good.</p> <p>At Wangaratta, one wheelie bin was observed to be unmarked.</p> <p>The ISCA six monthly site audit was conducted 31 August 2023. No significant issues raised.</p> <p>Reuse practices:</p> <ul style="list-style-type: none"> <li>• Clean but broken wooden rail sleepers are reused for landscaping.</li> <li>• Concrete rail sleepers are reused as wheel stops.</li> <li>• Cleared vegetation is</li> </ul> |          |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>mulched and reused in landscaping.</p> <ul style="list-style-type: none"> <li>Concrete waste is taken offsite to Wodonga Recyclers.</li> </ul> <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 was submitted to the Clean Energy Regulator in October 2023. (by Head Office)</p> <p>Housekeeping observed to be good at all sites. Some minor litter observed in the stockpile areas at MVH.</p> <p>Waste segregation has improved since last audit. All offices now have internal segregated bins. E-waste and</p> |          |

| No. | CEMP Requirements | Audit comments and findings   | Evidence |
|-----|-------------------|---|----------|
|     |                   | <p>batteries now diverted from landfill. Soft plastic pallet wrapping recycling now available at Wangaratta. Will be extended to other sites. Despite improvements in segregation, there was still a degree of cross-contamination in some recycling bins.</p> <p><b>Conclusion</b><br/>Conformance</p> <p><b>OFI – Some minor litter observed in the stockpile areas at MVH.</b></p> <p><b>OFI – Despite improvements in segregation, there was still a degree of cross-contamination in some recycling bins across the sites.</b></p> <p><b>OFI – At Wangaratta, one wheelie bin was observed to be unmarked.</b></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"> <li>• Site access locations</li> <li>• Site speeds</li> <li>• Haul roads</li> <li>• Changes to property access</li> <li>• Sensitive receivers</li> </ul> | <p>A traffic management plan (TMP) has been prepared and is available on site.</p> <p>All SEPs contained the required conditions from the TMP.</p> <p>Speed limit signage, entry exit signage is 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>MVH plan sighted 5-0013-110-PMA-20-PJ-001_2</p> <p><b>Conclusion</b><br/>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 Plan3-0013-11-0-POS-00-BJ-0005-5.</p> <p>Emergency contact details are listed on the SEPs and posted on crib room walls. (All sites)</p> <p>A spill response drill for Quarter 3 was conducted on 23/6/23 Wangaratta – other sites EPI reinforced.</p> <p>Checked general and oil/fuel spill kits onsite – kits contained full contents and labelled. (All sites)</p> <p><b>Conclusion</b><br/>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 &amp; Table 24). Aspect specific monitoring requirements are described in</p>  | <p>Monitoring requirements are described in the individual sub-plans.</p>  | <p>Checked sample of records providing evidence of required inspections and</p> |



| No.             | CEMP Requirements  | Audit comments and findings  | Evidence   |
|-----------------|--|--|--|
|                 | <p>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><b>Conclusion</b><br/>Conformance</p>   | <p>monitoring</p>  |
| <b>CEMP 5.5</b> | <b>Event Reporting and Investigation</b>   |  |  |
|                 | <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</p>   | <p>Incident reports including near misses are logged in ArcGIS, then CMO Dashboard.</p> <p>Incidents since last audit:</p> | <p>Checked sample of records providing evidence of event reporting and investigation</p> |

| No. | CEMP Requirements  | Audit comments and findings  | Evidence |
|-----|--|--|----------|
|     | <p>and the Environmental Manager.</p> <p>MCD will notify ARTC in accordance with the Environmental Event management process, 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>Archeological impact Wangaratta 27/7/23 Sucker truck used without archeological input. Procedural breach. No harm Closed out 2/8/23.</p> <p>Snake sighting Glenrowan 10/10/23. Snake departed and no further action required. Closed out 11/10/23.</p> <p>Damage to tree from grader. Overhead powerline site 1076. 8/11/23. Low impact. Tree inspected and trimmed by project ecologist. Closed out 1/12/23.</p> <p>11/9/23 Hazard report. Concrete truck was washed down at a roadside near Glenrowan. Site cleaned up same day, site scraped, closed</p> |          |

| No. | CEMP Requirements | Audit comments and findings  | Evidence |
|-----|-------------------|--|----------|
|     |                   | <p>out.</p> <p>5/10/23 Hazard report. Wangaratta Cat D stockpiles. Heavy rainfall washed out controls – coir logs. No sediment issues offsite, water sampling conducted. Coir logs were staked.</p> <p>Spills greater than 20 litres are listed as incidents. Smaller spills are listed as hazards.</p> <p>It was noted that Environmental officers did not have access to all incidents which appeared to be a back-end system issue.</p> <p><b>Conclusion</b><br/>Conformance<br/><b>OFI – Environmental officers did not have access to all incidents, back-end system issue.</b></p> |          |

| No.      | CEMP Requirements  | Audit comments and findings  | Evidence                                |
|----------|--|--|---|
| CEMP 5.6 | Audits   |  |   |
|          | <p>The Environment &amp; 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>Checked audit schedule 2069-MCD-PRW-QAC-SCH-0001 Inland Rail Project Audit Schedule 1.11.2023. Audits being conducted as per schedule.</p> <p>Waste audit conducted on JJ Richards 31 August 2023. Findings closed out.</p> <p>ISP Reviews.<br/>No major issues arising.</p> <p><b>Conclusion</b><br/>Conformance</p> | <p>Records check<br/>Audit schedule</p> |

| No.      | CEMP Requirements   | Audit comments and findings  | Evidence      |
|----------|---|--|---------------|
| 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 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>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 September 2023.- checked register. Waste segregation and litter improvements required.</p> <p><b>Conclusion</b><br/>Conformance</p> | Records check |
| 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>Checked project induction presentation material. (October 9,2023)</p> <p>The material covered Green rules, hazardous substances flora and Fauna and water and</p>   | Records check |

| No. | CEMP Requirements  | Audit comments and findings  | Evidence |
|-----|--|--|----------|
|     | <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>washout management.<br/>           However, the induction material did not cover all the aspects listed in the CEMP induction requirements such as air quality and biosecurity.<br/>           Checked sample of daily bulletins. Bulletin issued for 23/10/23 included Tree Protection Zones.<br/>           13/11/23 covered waste<br/>           Checked Pre-start forms for Wangaratta 18/4/23, 28/4/23 and 19/5/23. Glenrowan 18/12/23. Forms completed and cover environmental considerations.</p> <p><b>Conclusion</b><br/> <b>MiNC – Project induction material did not cover all the aspects listed in the CEMP induction requirements, missing aspects such as air quality and biosecurity.</b></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"> <li>• The D&amp;C Contractor’s updates to their respective CEMP and subplans.</li> <li>• Compliance status of requirements of any obligations obtained for activities as part of the D&amp;C Contractor’s activities and the works.</li> <li>• Completed site inspections, including number of inspections completed and open and closed corrective actions raised and completed.</li> <li>• Summary of environmental events for the month and open and closed corrective actions and lessons learned.</li> <li>• Pre-clearance surveys completed including details</li> </ul> | <p>Reporting requirements:</p> <ul style="list-style-type: none"> <li>• Monthly reporting is being carried out. Sighted monthly reports for November 2023 and September 2023. Monthly reports sampled contained required elements. As part of this reporting an updated Obligations Register (sighted) is submitted. Checked Obligations Register (Review Date 7/7/23) The Register noted compliance with all obligations.</li> </ul> <p><b>Conclusion</b><br/>Conformance</p> | <p>Records check</p> |

| No.      | CEMP Requirements  | Audit comments and findings  | Evidence      |
|----------|--|------------------------------|---------------|
|          | <p>of the monthly and cumulative totals of vegetation that has been cleared and fauna spotter/ catcher reports.</p> <ul style="list-style-type: none"> <li>• Waste classification, volumes and destinations (all recorded evidence and provided monthly).</li> </ul> <p>Environmental monitoring in accordance with CEMP and any other relevant standard or statutory requirement, where required.</p> <ul style="list-style-type: none"> <li>• Details of complaints and resolution.</li> <li>• Details of any inspections undertaken by regulators.</li> <li>• Details of any internal audits conducted, audit findings and corrective actions.</li> <li>• Positive environmental outcomes achieved, opportunities for improvement and lessons learned identified and implemented by the D&amp;C Contractor.</li> <li>• Next month's key areas of focus for upcoming works/ compliance requirements e.g. reports/audits etc</li> <li>• Key activities</li> </ul> |                              |               |
| CEMP 7.1 | Top Management Review  |                              |               |
|          | EXCO may include the Project in their regular review   | The EXCO review has not been | Records check |



| No. | CEMP Requirements  | Audit comments and findings  | Evidence |
|-----|--|--|----------|
|     | <p>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"> <li>• The status of actions from previous management reviews.</li> <li>• Changes in: <ul style="list-style-type: none"> <li>- External and internal issues that are relevant to the environmental management system.</li> <li>- The needs and expectations of interested parties, including compliance obligations.</li> <li>- Its significant environmental aspects.</li> <li>- Risks and opportunities.</li> <li>- The extent to which environmental objectives have been achieved.</li> <li>- Information on the organisation’s environmental performances, including trends in: <ul style="list-style-type: none"> <li>- Nonconformities and corrective actions.</li> <li>- Monitoring and measurement results.</li> <li>- Fulfilment of its compliance obligations.</li> </ul> </li> </ul> </li> </ul> | <p>undertaken to date.</p> <p><b>Conclusion</b><br/>Not able to be audited</p> |          |

| No.             | CEMP Requirements  | Audit comments and findings  | Evidence             |
|-----------------|--|--|----------------------|
|                 | <ul style="list-style-type: none"> <li>- Audit results.</li> <li>• Adequacy of resources.</li> <li>• Relevant communication(s) from interested parties, including complaints.</li> <li>• Opportunities for continual improvement.</li> </ul>   |  |                      |
| <b>CEMP 7.2</b> | <b>Project Management Review</b>   |  |                      |
|                 | <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"> <li>• Progress of the implementation of this plan.</li> <li>• Effectiveness of this plan.</li> <li>• Adequacy of resources.</li> <li>• Effectiveness of training and training requirements.</li> <li>• Results of inspections and audits.</li> <li>• Critical non-conformances or repeated non-conformances.</li> <li>• Overall performance against environmental compliance obligations.</li> </ul> | <p>Review 28/8/23 Reviewed by environmental team and. approved by Tom Foley Project Manager. Was sent to ARTC who did not provide comment.</p> <p>Revision of the CEMP was undertaken, however it is not clear how it was reviewed as minutes were not documented as per requirement.</p> <p><b>Conclusion</b><br/><b>MiNC – The Project</b></p> | <p>Records check</p> |

| No.             | CEMP Requirements  | Audit comments and findings   | Evidence      |
|-----------------|--|---|---------------|
|                 | <ul style="list-style-type: none"> <li>Organisational changes, changes to legislation and other obligations.</li> </ul> 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   | <b>Management Review has not been recorded on Minutes of Meeting (Doc# COR-GNG-FRM001-GEN-GRP).</b> |               |
| <b>CEMP 8.0</b> | <b>Lessons Learnt</b>  |   |               |
|                 | 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.<br><br>MCD, as part of the continual improvement process will review the efficacy of environmental compliance as detailed in this document and capture lessons within the lessons learnt register. | See CEMP 5.7 Continuous Improvement.<br><br><b>Conclusion</b><br>Conformance                        | Records check |

## Findings

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

| Findings   |
|--|
| <p><b>CEMP 1.5 Roles and Responsibilities</b></p> <p><b>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. (Carry over from audit 20/6/23)</b></p> |
| <p><b>CEMP 2.6 SEPs</b></p> <p><b>OFI – Wangaratta SEP. Some vegetation retention zones need updating.</b></p>   |
| <p><b>CEMP 4.2 Noise and Vibration</b></p> <p><b>OFI – A number of recent short-term noise exceedences were missing explanations. (Carry over from audit 20/6/23)</b></p>  |
| <p><b>CEMP 4.7 Hazardous Chemical Storage</b></p> <p><b>OFI – A number of paper copies of SDSs were not available in the fuel shipping container (MVH site).</b></p> <p><b>OFI – A number of paper copies of SDSs were not dated in the Wangaratta Flammable Liquids cabinet.</b></p>          |
| <p><b>CEMP Appendix 9, Erosion and Sediment Control</b></p> <p><b>MiNC – Coir logs had been removed from the discharge point at Wangaratta.</b></p>  |

|  |
|--|
| <b>Findings</b>  |
| <p><b>EPR W1 Waste Management</b></p> <p>OFI – Some minor litter observed in the stockpile areas at MVH.</p> <p>OFI – Despite improvements in segregation, there was still a degree of cross-contamination in some recycling bins across the sites.</p> <p>OFI – At Wangaratta, one wheelie bin was observed to be unmarked.</p> |
| <p><b>CEMP 5.5 Event reporting and Investigation</b></p> <p>OFI – Environmental officers did not have access to all incidents, back-end system issue.</p>  |
| <p><b>CEMP 6.1 Communication of Environmental Information</b></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>   |
| <p><b>CEMP 7.2 Project Management Review</b></p> <p>MiNC – The Project Management Review has not been recorded on Minutes of Meeting (Doc# COR-GNG-FRM001-GEN-GRP).</p>  |