

## Wangaratta & Seymour Avenel Road Sites – CEMP audit May 2024

<b>Site Name</b>	Wangaratta and Seymour Avenel Road Sites.	<b>Project Manager (s)</b>	Tom Foley
<b>Audit Physical Location</b>	Wangaratta 1-23 Spearing St, and Seymour Avenel Road	<b>Senior Manager (s)</b>	Miguel Reyes – Construction Manager Peter Lacki – Senior Project Engineer
<b>Audit Date</b>	27-28.05.2024	<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 Damon Barclay – McConnell Dowell - Environmental and Sustainability Advisor Natali De Carvalho – McConnell Dowell - Environmental and Sustainability Advisor
<b>Reference</b>	AE1221	<b>Version</b>	V1.1
<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 and Seymour Avenel Road 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>	<p>OFI – Opportunity for further improvement</p> <p>MiNC – Minor Non Conformance</p> <p>MNC – Major Non Conformance</p>
<b>Introductory Notes</b>	<p>The Wangaratta site is undergoing work on the station and underpass. The Green St bridge has been demolished and piling completed. Formwork is in place for the retaining wall.</p> <p>At the Seymour Avenel site, the Seymour bridge has been demolished and vegetation clearance nearly complete. Piling is complete and formwork underway.</p> <p>The Murray Valley Highway site was completed in November and is in handover.</p> <p>At Glenrowan sheds have been demobilised, hardstand reinstated and landscaping will be completed in the next couple of months.</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 days 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>

© Accent Environmental Pty Ltd. **Limitations:** This document has been prepared for the sole use of McConnell Dowell for the purpose stated in the document. No other party should rely on this document without the prior written consent of Accent. Accent undertakes no duty, nor accepts any responsibility, to any third party who may rely upon or use this document. This document has been prepared based on: McConnell Dowell's description of its requirements; documents and information provided by McConnell Dowell; and Accent's experience having regard to assumptions that Accent can reasonably be expected to make in accordance with sound professional principles. Accent has also relied upon information provided by third parties to prepare this document, some of which may not have been verified. No account could be taken of any changes to site conditions that may have occurred since field inspections were completed or since the documents and information provided by McConnell Dowell were prepared, or subsequent to the preparation of this document. Subject to the above conditions, this document may be transmitted, reproduced or disseminated only in its entirety.

## 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> <p>a) Inland Rail’s Environmental Management System; and b) the Construction Environmental Management Plan for the Works.</p>	<p><b>Conclusion</b></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. The objectives and performance criteria are shown in Table 6.</p>	<p>Site inspection and checked incident reports. No material damage observed. No infringements from regulators.</p>	<p>Records check Complaints log</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>Targets relevant to this plan include:</p> <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>Compliance with monitoring, sample of records.</p> <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>Notification for nightworks for a Monday, but Victrack postponed to Wednesday. 5 day notification required. Works occurred Wed 6 Dec 2023. Incident raised – now must be escalated with ARTC and discussed re shorter notification. Notified EPA. EPA did not respond.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Four complaints of night noise raised.</p> <p>Incident report CMO 20231208132. Comms team responded to 4 complainants 7 December 2023. Complaints resolved.</p> <p>Since last audit. neighbour complaint to EPA re alleged asbestos in soil stockpile. EPA came to site. 21/3/24 Entry Notice issued. EPA checked waste records and found no issues. No further action required.</p> <p>CMO 20240325676 Fire incident, 15/12/23. Overheads team near Creighton, installing a stay on power pole. Ute in long grass started grassfire from catalytic converter. Burnt 32 Ha. Grazing land. No issue for farmer as the land was due</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>for a stubble burn. Adjacent to area of threatened species but not affected. Raised as incident - moderate.</p> <p>CMO 20231215121 Sediment control failure at Wangaratta site noted by DEECA on 3 January 2024 who issued a letter 8 Jan 2024. Raised as a hazard. 80 mm of rain in 48 hours dislodged coir logs on rock beaching on a weekend. No offsite discharge. Logs reinstated on 8 January. Hazard closed out</p> <p>CMO 2024050651 Incident 3/5/24 Seymour. A 2 inch hydraulic hose split, estimated 300 litres of oil released to hardstand. Contained 3/5/24 Cleaned up 7/5/24. Material stockpiled</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>for disposal. Closed out 13 May 2024 (except disposal)</p> <p>Incident CMO 2024051359. Ground disturbance at Seymour Avenel. 11/5/24 An excavator cleaning up some logs tracked over area of 'No Disturbance' under the CHMP 17401. Area flagged off as walkway, no signage but marked on the SEP. Minimal disturbance but Taungurung notified. Requested Taungurung to come to site 13/5/24. Ongoing.</p> <p>EPA email query 25/9/23. During September occupation Bowser site – clean fill sent to pad site on farmers property. EPA concerned re farmer practices. Entry report 14 Aug</p>	



No.	CEMP Requirements	Audit comments and findings	Evidence
		2023 for the farmer’s property. EPA checked paperwork – no issues. No unlawful activity. To avoid potential issues, this site no longer used Not listed as an incident.  <b>Conclusion</b> Conformance	
CEMP1.5	<b>Roles and Responsibilities</b>		
CEMP 1.5  PSR 6.1.2	Environmental management roles and responsibilities  Table 7 summarises the Project resources that will contribute to the overall management of the Project’s environmental requirements.  The Contractor must ensure that the Environment Manager is adequately supported by additional resources to meet the requirements of the Contract.	Checked key environmental resources – Environment and Sustainability Manager is supported by two Environmental advisors. Further support is provided by an external consultant for climate change risk and energy assessment. Regional sustainability support is	Check of resources and qualifications for key personnel

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>provided 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 are still considerable.</p> <p>Carryover from audit 15/11/24</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 role. MCD provided</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>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 been raised with ARTC but has not been resolved. (Carry over from Glenrowan audit 15/11/23)</b></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"> <li>• Environmental Policy</li> <li>• Environmental Risk Assessment (ERA)</li> </ul>	Checked MCD MMS system and all framework elements in place.	Framework elements online

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> <li>• Issue-Specific Sub Plans</li> <li>• Environmental Green Rules</li> <li>• Site Environmental Plans</li> <li>• Environmental Protection Instructions</li> </ul>	<p><b>Conclusion</b> Conformance</p>	
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 12/4/24 for a Critical Risk Assessment. There will be an upcoming overall review on 30/5/24.</p> <p><b>Conclusion</b> Conformance</p>	'Live' ERA on system
CEMP 2.6	SEPs		
CEMP 2.6, incorporates PSR 6.1.4	Site environment plans are produced for each enhancement site...	Each enhancement site has a Site Environmental Plan (SEP).	Check of SEP requirement compliance

No.	CEMP Requirements	Audit comments and findings	Evidence
	SEPs will detail the following: <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> <li>o Site compound locations</li> </ul> </li> </ul>	Checked Wangaratta SEP (Rev 15/11/23) Seymour Avenel (Revision Date 5/2/24). All required elements are detailed in each SEP, however the Seymour Avenel SEP is missing a section of No Go Fencing designation.  <b>Conclusion</b> Conformance  <b>OFI – The Seymour Avenel SEP is missing a section of No Go Fencing designation.</b>	
CEMP 3.1, 3.2	Legislation Policies, Guidelines and Other Relevant Documents		

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 3.1, 3.2 incorporating 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.</p> <p>Legal requirements and other obligations are comprehensively covered and kept updated (last updated 26/9/23). One non-compliant item listed. A condition of EPR FF1 - Habitat crossing requiring rope bridges at Seymour. A vegetation clearing gap of 200 m has made it not possible for fauna crossings where the bridge is constructed. It is not logistically possible to put in rope bridges during construction. This has been minuted in meetings with DEECA and DEECA is aware of the issue. Will remain as non-compliance in the register until resolved at end of construction.</p>	<p>Check of legal and other requirements register</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p><b>Conclusion</b> Conformance re documentation requirements. Records show temporary non-conformance with EPR FF1</p>	
PSR6.3.12	Sustainability Management Plan		
PSR 6.3.12	<p>The Sustainability Management Plan must:</p> <ul style="list-style-type: none"> <li>a) be a single volume for the whole of the Contractor’s Activities;</li> <li>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)]</li> </ul>	<p>Checked Sustainability management plan. (Revision 2 20/4/23, Revision 3 being finalised). Contains required elements.</p> <p>Three external audits have been conducted. Last audit 10 April 2024. Report pending. Provisionally 1 NC for standalone Sustainability Manager issue. Several OFIs recommending standalone trackers for material energy and water credits. ISP reviews were conducted last week, 21/5/24. Draft report - No nonconformances, Otherwise,</p>	Checked implementation of current plan, Revision 2

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>several minor opportunities for improvement.</p> <p>Project reporting.</p> <p>Checked MCD monthly reporting spreadsheet including NGERS data.</p> <p>Monthly data is checked by a Regional Sustainability Manager prior to submission.</p> <p>Checked IR SRS system reporting. The Scorecard showed sustainability targets on track. High confidence of achieving level 2.</p> <p>KPI tracking – on track</p> <p><b>Conclusion</b> Conformance</p>	
CEMP 3.3	Project Specific Requirements		



No.	CEMP Requirements	Audit comments and findings	Evidence
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>Glenrowan</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)</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>At stage 3b of plan.</p> <p>Endorsed by HV – checked record of 2/11/23.</p>	Check of secondary approvals

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Arch Mgt Plan 30/10/23. There are 5 stages – Still currently at stage 3 for the Glenrowan bridge demolition and construction. It includes processes for dealing with unexpected finds. Endorsed by HV – checked record of 15/6/23.</p> <p>CHMP 17752 Glenrowan sighted. (See Section 4.5 Heritage)</p> <p>Landscape Management Plan – endorsed.</p> <p>Seymour Avenel Road CHMP 17401 – sighted. Conditions complied with. Checked CHMP induction records.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>15/2/24 FFG Permit for Dianella Tarda and Sticky Everlasting.</p> <p>No European heritage matters.</p> <p>Landscape Management Plan – endorsed.</p> <p>Wangaratta Wangaratta Heritage Permit P34386. Condition complied with to facilitate works.</p> <p>CHMP 17402 Wangaratta sighted. (See Section 4.5 Heritage). Conditions complied with.</p> <p>IFC plans endorsed. Exemptions from Heritage Permit gained for conduit installation 21/7/23. Also, an exemption for temporary</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		removal of a staircase gained. 11/4/24  <b>Conclusion</b> Conformance	
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	PAZs are worked on progressively. So far, three overhead sites have been set up, including Seymour.  Checked Habitat zone clearing tracker, April 2024. Total amount approved for clearing 24.55 ha. 3.1 ha vegetation cleared (none EPBC listed). Total avoided 3.84 ha.  <b>Conclusion</b> Conformance	

No.	CEMP Requirements	Audit comments and findings	Evidence
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"> <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 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</li> </ul>	<p>The subplan contains the required elements listed in the CEMP.</p> <p>Wangaratta. Real time monitoring is in place for PM10 and PM2.5. Checked dust monitoring results since last audit, November 2023. Compliant. All spikes explained (e.g. residents' chimneys).</p> <p>Seymour Avenel Rd No monitoring required. No nearby sensitive receivers. No dust suppression measures have been required to date apart from the use of a water tanker. No dust issues observed.</p> <p>Glenrowan</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	support continual improvement	<p>Real time monitoring is in place for PM10 and PM2.5.</p> <p>Environmental Controls 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>Site inspection – No dust issues evident at Wangaratta or Seymour Avenel sites.</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>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p><u>All sites</u>            No burning on site.            No odour issues to date.            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; machinery.            Checked weekly inspections - up to date for both sites.            Checked sample of recent reports. 23/5/24 Wangaratta, 24/5/24 Seymour.</p> <p>No diesel smoke of greater than 10 seconds observed.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Site Specific Control Measures contained 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> <p>Scheduling</p> <ul style="list-style-type: none"> <li>• Scheduling to minimise 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</li> </ul>	



No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>necessary according to MCD as dust has not been an issue.</p> <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> <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 Seymour.</li> </ul>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> <li>Regular inspections made (formal weekly).</li> </ul> <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).</p> <p>Included in the plan are controls to address the 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</li> </ul>	<p>The construction noise and vibration management plan (5-0013-110-PES-00-PJ-0003) includes required listed elements.</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>and details provided to ARTC – Refer to section 5.5 for reporting</p> <ul style="list-style-type: none"> <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 access roads and hardstand areas shall have potholes filled in a timely fashion</li> <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> </ul>	<p>There has been one complaint re noise. See Objectives and Targets.</p> <p>Checked real time monitoring since November 2023. 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 sample of Wangaratta exceedances – relates to birds, dogs and wind.</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
	<ul style="list-style-type: none"> <li>Appropriate construction traffic speed limits shall be established and enforced near noise sensitive receivers</li> </ul>	<p>Checked Wangaratta vibration monitoring since November 2023. No exceedances.</p> <p>A number of recent short-term noise exceedances were missing explanations.</p> <p><i>Conclusion</i>  <b>OFI – A number of recent short-term noise exceedances were missing explanations. (Carry over from Glenrowan audit 15/11/23)</b></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 ecological aspects:</p> <ul style="list-style-type: none"> <li>The flora and fauna management plan (3-0013-</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>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>110-PVP-00-PJ-0008) provides:</p> <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 remnant native vegetation</li> <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</li> </ul>	<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 moving across site. 149 interactions across all sites. Striped legless lizard survey conducted by Habitat Services Pty Ltd., O/H site 1088.</li> <li>• Preclearance for Seymour last week, Habitat Services.</li> </ul>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	fencing and TPZ fencing o Details of suitably qualified arborists o Opportunities for re-use	<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> Other threatened species matters: <ul style="list-style-type: none"> <li>• No Golden Sun moths found.</li> <li>• No threatened fauna matters evident to date.</li> </ul> Tree Protection Management Plan <ul style="list-style-type: none"> <li>• Objectives and targets are being met.</li> <li>• Vegetation Disturbance Permits Seymour 4 issued last week.</li> </ul>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> <li>• GIS layer used to track impacts on trees.</li> <li>• No Go Zones shown in the Seymour Avenel SEP. TPZs shown in the Wangaratta SEP.</li> <li>• TPZs are inspected weekly as per TMP requirement.</li> </ul> <p>Wangaratta. Inspected Tree Protection Zones (TPZ). All constructed as per Site Environmental Plan and in good order.</p> <p>Seymour No Go Zones marked (cover TPZs). At the end of 2023 FFG listed species were discovered (not previously found by ARTC ecologists) 15/2/24 FFG</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>permit was gained to relocate 74 plants.</p> <p>On 23/5/24 Sugar glider found during tree clearing, despite a pre-clearance being undertaken. An ecologist onsite took the glider to a vet for a check.</p> <p>Hazard CMO 2024052326 raised.</p> <p>As noted in CEMP 3.1 Legislation - condition EPR FF1 requiring rope bridge habitat crossings at Seymour is currently not being met. A vegetation clearing gap of 200 m has made it not possible for fauna crossings where the bridge is constructed. It will remain as a non-compliance until construction is completed.</p>	



No.	CEMP Requirements	Audit comments and findings	Evidence
		<p><b>Conclusion</b>  <b>MiNC – condition EPR FF1 requiring rope bridge habitat crossings at Seymour is currently not being met.</b></p>	
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>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>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Wangaratta - no significant issues re weeds.</p> <p>Seymour Avenel Rd – no significant issues re weeds.</p> <p>Glenrowan – will require some spraying for blackberry, blue periwinkle.</p> <p><b>Conclusion</b> 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>Seymour Avenel Rd - Voluntary CHMP 17401 in place, Andrew Long and Associates- sighted. Site has no excavation areas, which are marked on the SEP.</p> <p>With Tranche 2 upcoming, there have been amendments to the CHMP.</p> <p>Taungurung conduct inductions.</p>	Inspection and records check of plans

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>RAP will visit at the time of maximum excavation.</p> <p>Wangaratta - CHMP 17402 sighted.</p> <p>CHMP induction program is a 13 minute video produced in conjunction with the Yorta Yorta people.</p> <p>Wangaratta Heritage Permit 34386 Stage 3, Site H1595. Archaeological Management Plan Rev 3b is in place. Next revision in draft and will cover until the end of the project.</p> <p>Glenrowan Heritage Precinct VHR H2000 Stage 3 Archaeological Management Plan is in place.</p> <p><b>Conclusion</b> Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
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&amp;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&amp;SMP will be used as the primary source for all activities relating to contaminated land management.</p>	<p>CL&amp;SMP (5-0013-110-PES-00-PJ-0001) is in place.</p> <p>Checked material tracking register. On site movements tracked.</p> <p>Unexpected, contaminated soil finds have occurred at Wangaratta and Glenrowan. Asbestos pipe at Glenrowan last week. Licensed contractor North East Insulation &amp; Asbestos will remove asbestos.</p> <p>Wangaratta. Concrete footbridges contained cement sheet.</p> <p>Licensed contractor North East Insulation &amp; Asbestos will remove asbestos. They assessed last week</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Logged on hazard reporting system - Wangaratta report still to be logged.</p> <p>Glenrowan The soil stockpile onsite contains Category D soil. The stockpile has relevant signage. It has been polymer dosed to prevent erosion.</p> <p>Wangaratta Cat D stockpile. – March 2024 some taken to the Dive structure. Merton Consulting Group has taken the remainder to Bendigo remediation site. Checked documentation re Merton Consulting Group job.</p> <p>Seymour Avenel Rd Spill contaminated materials are stored in plastic bags on</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>temporary bunds whilst awaiting disposal.</p> <p>There is a small, contaminated soil stockpile at the compound from an oil spill. It is plastic-covered; however, the plastic has been breached requiring re-covering. The stockpile should also be bunt-taped and labelled.</p> <p>There is another small, contaminated soil stockpile on site from an oil spill. It is adequately covered and bunt-taped. However, the stockpile should be labelled.</p> <p>Approximately 1000t of Category D soil has been taken to a Bendigo mine site under an A16 permit via Merton Consulting Group.</p> <p>A Site Material Movement Plan to track contaminated soils has been prepared.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Weekly inspection checklist includes contaminated soil.</p> <p><b>Conclusion</b> Conformance</p> <p><b>OFI – The contaminated soil stockpile at the Seymour Avenel Rd compound requires re-covering, bunt taping and labelling. The second contaminated stockpile should be labelled.</b></p> <p><b>OFI - Wangaratta asbestos hazard report to be logged.</b></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>Seymour Avenel Chemicals are stored in the Site compound. A dedicated chemical cabinet houses chemicals and fuels. Fuels are stored in approved fuel containers and</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>containers are marked for their contents.  Sample of SDSs checked.  There were no signs of spillage at the chemical storage areas or the site compound.  2 of 4 spill kits (yellow wheelie bin type) checked.  Additionally, there are 2 smaller mobile kits available.  Wangaratta.  Flammable Liquids cabinet – checked. Printed SDSs available. Checked sample of SDSs – Jotun Jotaprime 505 not present.  An IBC of Bondfast Erosion Control polymer is currently unbanded - planned to be placed on a banded pallet.</p> <p><b>Conclusion</b>  Conformance</p>	



No.	CEMP Requirements	Audit comments and findings	Evidence
		<p><b>OFl – Wangaratta flammable liquids cabinet. SDS for Jotun Jotaprime not present.</b></p> <p><b>OFl – An IBC of Bondfast Erosion Control polymer is currently unbunded - planned to be placed on a banded pallet.</b></p>	
<p>CEMP Appendix 9</p> <p>EPR SW2</p>	<p>Erosion and Sediment Control (surface water) Surface Water and Groundwater procedures</p> <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</p>	<p>Management Procedures (SWMPs) are recorded in Appendix 9 of the CEMP.</p> <p>From previous audit - 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>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>	<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 in the discharge to the adjacent paddock. No tracking of mud was observed leaving the site.</p> <p>Wangaratta site</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Coir logs in place near the discharge point.</p> <p>Sediment fences in place as per plans.</p> <p>No tracking of mud was observed leaving the site.</p> <p>Seymour Avenel Rd.</p> <p>No erosion or sediment release issues observed in the work area or compound.</p> <p>Coir logs are employed along Grantville Drive. Sediment fences have been erected along Avenel Rd and are in good order. Coir logs have been placed at the culvert at the Seymour Avenel Rd/ Avenel Rd intersection.</p> <p>There is evidence of a minor sediment washout from a soil stockpile behind the compound; however, it has not washed offsite and a</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>polymer solution will be applied to the stockpile. Daily street sweeping is undertaken.</p> <p><b>Conclusion</b> Conformance</p>	
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. Construction Diversion rate 96% Office 14% - there is an anomaly with JJ Richards figures based on skiploads, no scales used. This is to be resolved.</p> <p>Office waste stream quantities input to sustainability reporting. Waste contractor JJ Richards reports quarterly.</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>A concrete washout bay lined with plastic is in use at Glenrowan. (from last audit)</p> <p>Wangaratta and Seymour Avenel Rd sites make use of concrete washout bags.</p> <p>Wangaratta and Seymour Avenel Rd sites.</p> <p>Seymour Avenel Rd site has the same bin system as Wangaratta - general waste, mixed recyclables (sorted downstream by JJ Richards) and construction waste. At both sites waste segregation is generally good, however the yellow recycling bins often contained quantities of non-recyclable coffee cups.</p> <p>The ISCA six monthly site audit was conducted Jan</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>2024. Benalla transfer station No issues to report.</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 sleepers removed for decommissioned tracks reused in Heywood railway project (ARTC).</li> <li>• Concrete rail sleepers are reused as wheel stops.</li> <li>• Cleared vegetation is mulched and reused in landscaping.</li> <li>• Concrete waste is taken offsite to Wodonga Recyclers.</li> </ul> <p>NGERS reporting is being conducted. Monthly report</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>sent to subcontractors and the data is placed on Workbench software.</p> <p>An annual NGRS report was submitted to the Clean Energy Regulator in October 2023 (by Head Office).</p> <p><b>Conclusion</b> Conformance <b>OFI – Some yellow recycling bins contained quantities of non-recyclable coffee cups.</b></p>	
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</p>	<p>A traffic management plan (TMP) has been prepared and is available on site.</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>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 in previous audit– Inland Rail T2A TRANCHE 1. MVH plan sighted 5-0013-110-PMA-20-PJ-001_2.</p> <p><b>Conclusion</b> Conformance</p>	
<b>CEMP 4.9</b>	<b>Emergency Preparedness</b>		
	<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</p>	<p>Sighted Emergency Response and Incident Management Plan3-0013-11-0-POS-00-BJ-0005-5.</p>	<p>Inspection and records check of controls, including spill management.</p>



No.	CEMP Requirements	Audit comments and findings	Evidence
	SEPs and emergency contacts for each site posted on crib room walls. This will detail the person, their role and their contact information.	<p>Emergency contact details are listed on the SEPs and posted on crib room walls (all sites). A spill response drill for Quarter 3 was conducted on 23/6/23 Wangaratta, next one due in June– other sites EPI reinforced.</p> <p>Wangaratta and Seymour Avenel Rd sites Checked spill kits onsite – kits contained full contents and labelled.</p> <p><b>Conclusion</b> Conformance</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 the individual sub-plans.</p> <p>MCD will undertake environmental monitoring,</p>	<p>Monitoring requirements are described in the individual sub-plans.</p> <p><b>Conclusion</b></p>	Checked sample of records providing evidence of required inspections and monitoring

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>	Conformance	
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, where an actual or potential material or serious environmental harm event has been identified. (Appendix 8)</p>	<p>Incident reports including near misses are logged in ArcGIS, then CMO Dashboard.</p> <p>Incidents since last audit (as per CEMP 1.4 above):</p> <p>Notification for nightworks for a Monday, but Victrack postponed to Wednesday. 5 day notification required. Works occurred Wed 6 Dec 2023I. Incident raised – now</p>	Checked sample of records providing evidence of event reporting and investigation

No.	CEMP Requirements	Audit comments and findings	Evidence
	<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>must be escalated with ARTC and discussed re shorter notification. Notified EPA. EPA did not respond.</p> <p>Four complaints of night noise raised.</p> <p>Incident report CMO 20231208132. Comms team responded to 4 complainants 7 December. Complaints resolved.</p> <p>Since last audit. neighbour complaint to EPA re alleged asbestos in soil stockpile. EPA came to site. 21/3/24 Entry Notice issued. EPA checked waste records and found no issues. No further action required.</p> <p>CMO 20240325676</p> <p>Fire incident, 15/12/23.</p> <p>Overheads team near Creighton, installing a stay on power pole. Ute in long grass started grassfire from catalytic converter. Burnt 32</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>ha. Grazing land. No issue for farmer as the land was due for a stubble burn. Adjacent to area of threatened species but not affected. Raised as incident - moderate.</p> <p>CMO 20231215121 Sediment control failure at Wangaratta site noted by DEECA on 3 January 2024 who issued a letter 8 Jan 2024. Raised as a hazard. 80 mm of rain in 48 hours dislodged coir logs on rock beaching on a weekend. No offsite discharge. Logs reinstated on 8 January. Hazard closed out.</p> <p>CMO 2024050651 Incident 3/5/24 Seymour. A 2 inch hydraulic hose split, estimated 300 litres of oil released to hardstand. Contained 3/5/24 Cleaned up</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>7/5/24. Material stockpiled for disposal. Closed out 13 May 2024 (except disposal).</p> <p>Incident 2024051359. Ground disturbance at Seymour Avenel 11/5/24.</p> <p>An excavator cleaning up some logs tracked over area of 'No Disturbance' under the CHMP 17401.</p> <p>Area flagged off as walkway, no signage but marked on the SEP. Minimal disturbance but Taungurung notified.</p> <p>Requested Taungurung to come to site 13/5/24.</p> <p>Ongoing.</p> <p>EPA email query 25/9/23. During September occupation Bowser site – clean fill sent to pad site on farmers property. EPA concerned re farmer practices. Entry report 14 Aug</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>2023 for the farmers property.  EPA checked paperwork – no issues. No unlawful activity.  To avoid potential issues, this site no longer used  Not listed as an incident.</p> <p>It was noted that Environmental officers did not have access to all incidents which appeared to be a back-end system issue.  Carryover from audit 15/11/23</p> <p><b>Conclusion</b>  Conformance  <b>OFI – Environmental officers did not have access to all incidents, back-end system issue. Carryover from audit 15/11/23.</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 8/5/2024. Audits being conducted as per schedule.</p> <p>ISP Reviews. No major issues arising.</p> <p><b>Conclusion</b> Conformance</p>	<p>Records check Audit schedule</p>
CEMP 5.7	Continuous Improvement		

No.	CEMP Requirements	Audit comments and findings	Evidence
	<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 – checked list of lessons learnt.</p> <p>·</p> <p><b>Conclusion</b> Conformance</p>	<p>Records check</p>
<b>CEMP 6.1</b>	<b>Communication of Environmental Information</b>		
	<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</p>	<p>Checked project induction presentation material (October 9,2023).</p> <p>The induction material covered the aspects listed in the CEMP induction requirements.</p>	<p>Records check</p>



No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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 sample of daily bulletins. Bulletin issued for 15/5/24 included No Go Zones.</p> <p>Checked Vehicle and Equipment checklist forms for Wangaratta Concrete pump 23/6/23. Hi Lux 27/9/22.</p> <p><b>Conclusion</b> Conformance</p>	
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</li> </ul>	<p>Reporting requirements:</p> <ul style="list-style-type: none"> <li>• Monthly reporting is being carried out. Sighted monthly reports for March 2024 report sampled contained required elements. As part of this reporting an updated Obligations Register (sighted) is submitted. Checked</li> </ul>	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>obligations obtained for activities as part of the D&amp;C Contractor's activities and the works.</p> <ul style="list-style-type: none"> <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 of the monthly and cumulative totals of vegetation that has been cleared and fauna spotter/ catcher reports.</li> <li>• 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.</li> <li>• Details of complaints and resolution.</li> <li>• Details of any inspections undertaken by regulators.</li> <li>• Details of any internal audits conducted, audit</li> </ul>	<p>Obligations Register (Review Date 7/7/23)</p> <p><b>Conclusion</b> Conformance</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>findings and corrective actions.</p> <ul style="list-style-type: none"> <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		
	<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"> <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> </ul> </li> </ul>	<p>The EXCO review has not been undertaken to date.</p> <p><b>Conclusion</b> Not able to be audited</p>	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> <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> <li>- Audit results.</li> </ul> </li> <li>• Adequacy of resources.</li> <li>• Relevant communication(s) from interested parties, including complaints.</li> <li>• Opportunities for continual improvement.</li> </ul>		
CEMP 7.2	Project Management Review		
	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	Next review due Q3 2024  <b>Conclusion</b>	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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> <li>• Organisational changes, changes to legislation and other obligations.</li> </ul> <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>	Conformance	
CEMP 8.0	Lessons Learnt		
	Lessons learnt and continued improvement is detailed in this CEMP. A snapshot lessons learnt summary is included as Appendix 5. This will be	See CEMP 5.7 Continuous Improvement.	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>updated as the Project progresses, and learnings are identified.</p> <p>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.</p>	<p><b>Conclusion</b> Conformance</p>	

## 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 been raised with ARTC but has not been resolved. (Carry over from Glenrowan audit 15/11/23)</b></p>
<p><b>CEMP 2.6 SEPs</b></p> <p><b>OFI – The Seymour Avenel SEP is missing a section of No Go Fencing designation.</b></p>
<p><b>CEMP 4.2 Noise and Vibration</b></p> <p><b>OFI – A number of recent short-term noise exceedances were missing explanations. (Carry over from Glenrowan audit 15/11/23)</b></p>
<p><b>CEMP 4.3 Flora and Fauna</b></p> <p><b>MiNC – Condition EPR FF1 requiring rope bridge habitat crossings at Seymour is currently not being met.</b></p>
<p><b>CEMP 4.6 Contamination</b></p> <p><b>OFI – The contaminated soil stockpile at the Seymour Avenel Rd compound requires re-covering, bunt taping and labelling. The second contaminated stockpile should be labelled.</b></p> <p><b>OFI – Wangaratta asbestos hazard report to be logged.</b></p>
<p><b>CEMP 4.7 Hazardous Chemical Storage</b></p>

<b>Findings</b>
<p><b>OFI –Wangaratta flammable liquids cabinet. SDS for Jotun Jotaprime not present.</b></p> <p><b>OFI – An IBC of Bondfast Erosion Control polymer is currently unbunded - planned to be placed on a banded pallet.</b></p>
<b>EPR W1 Waste Management</b>
<p><b>OFI – Some yellow recycling bins contained quantities of non-recyclable coffee cups.</b></p>
<b>CEMP 5.5 Event reporting and Investigation</b>
<p><b>OFI – Environmental officers did not have access to all incidents, back-end system issue. (Carry over from Glenrowan audit 15/11/23).</b></p>