

Wangaratta, Glenrowan & Seymour Avenel Road Sites – CEMP audit November 2024

Site Name	Wangaratta and Seymour Avenel Road Sites.	Project Manager (s)	Joel Allan
Audit Physical Location	Wangaratta 1-23 Spearing St, and Seymour Avenel Road	Senior Manager (s)	Darith Sam – Construction Manager Peter Lacki – Senior Project Engineer
Audit Date	20-21.11.2024	Auditor (s)	Mark Nan Tie – Accent Environmental. Independent Environmental Auditor
Entity being Audited	McConnell Dowell – RSD Australia	Auditee	Steve Eeles – McConnell Dowell Environment and Sustainability Manager Lachlan McCann – McConnell Dowell - Environment and Sustainability Manager
Reference	AE1221	Version	V.1.0
Reviewed by	Michael Cramer – Accent Environmental	Approved by	Michael Cramer – Accent Environmental
Audit Objective	To ensure conformance to the Inland Rail Construction Environmental Management Plan and associated subplans, Environmental Management Framework, relevant PSRs and conditions of project approvals in accordance with applicable Independent Environmental Auditor requirements.		
Audit Scope	Wangaratta, Glenrowan and Seymour Avenel Road Enhancement Sites.		

Audit Criteria	Construction Environmental Management Plan and associated subplans, Environmental Management Framework, relevant PSRs and conditions of project approvals.
Abbreviations used in this document	<p>OFI – Opportunity for further improvement</p> <p>MiNC – Minor Non Conformance</p> <p>MNC – Major Non Conformance</p>
Introductory Notes	<p>At the Wangaratta works have been completed on the east track, dive structure, lift shafts and platform. The underpass is complete except for final cladding. For the Green St bridge, the deck is in place and preparatory pavement work is underway. Works are expected to be completed by the end of the year.</p> <p>At the Seymour Avenel site, the Seymour bridge has been installed. Vegetation removal has been completed. Fill complete on batter work and work being carried out on sub-pavement. A new gravel road will be tied in shortly. Topsoil is being tested for nutrients. Re fauna crossing requirement EPR FF1, McConnell Dowell is considering undertaking a feasibility study.</p> <p>The Murray Valley Highway site was completed in November 2023 and is in handover. Landscaping and rehabilitation to be checked for requirements.</p> <p>At Glenrowan sheds landscaping is nearing completion. Heritage permits being closed out.</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.

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Audit criteria and findings

No.	CEMP Requirements	Audit comments and findings	Evidence
EMF 1 and PSR 6.2.1	Environmental Management System		
EMF 1 PSR 6.2.1	<p>The Contractor must prepare and implement an Environmental Management System (EMS). The EMS must be prepared in accordance with AS/NZS ISO 14001:2015</p> <p>This system must be developed, delivered and maintained to be consistent with:</p> <ul style="list-style-type: none"> a) Inland Rail's Environmental Management System; and b) the Construction Environmental Management Plan for the Works. 	<p>Conclusion</p> <p>Conformance</p>	<p>Record of EMS online Certified by Bureau Veritas Pty Ltd Valid to 11/3/27</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"> • Avoid causing damage from activities that result in negative environment and sustainability outcomes • Zero infringements from regulators • Achieve 100% compliance with monitoring requirements as outlined in this plan • Achieve 100% notification compliance to stakeholders and the community • Respond to any community complaints within 48 hours. 	<p>Compliance with monitoring, sample of records.</p> <p>Community notifications. From audit 15/11/23</p> <p>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>Since last audit no community complaints, no infringements from regulators</p> <p>From previous audit 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 for disposal. Closed out 13 May 2024 (except disposal) This audit update: stockpile still on site, will be removed during completion works.</p> <p>From previous audit</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<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. McConnell Dowell requested Taungurung to come to site 13/5/24. This audit update: Taungurung referred the incident to the First Peoples - State Relations (FRSR) who came to site. FRSR subsequently issued a warning letter advising that condition 6 for notification for subsurface impact and condition 3 subsurface impact had not been met. No further action. Incident closed.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>This audit: Incident CMO 20240604141.0 3/6/24. Green St bridge Wangaratta. vegetation disturbance. Project team removed trees for crane access through a stockpile area. MCD environment section not notified. Landowner approval was granted however a vegetation disturbance permit was not sought. Approval from council required. Once known, council and DEECA notified. Council came to site. No action resulted. Incident closed.</p> <p>Conclusion</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		Conformance	
CEMP1.5	Roles and Responsibilities		
CEMP 1.5 PSR 6.1.2	<p>Environmental management roles and responsibilities</p> <p>Table 7 summarises the Project resources that will contribute to the overall management of the Project's environmental requirements.</p> <p>The Contractor must ensure that the Environment Manager is adequately supported by additional resources to meet the requirements of the Contract.</p>	<p>Checked key environmental resources – Environment and Sustainability Manager is supported by two Environmental advisors.</p> <p>With Tranche 1 nearing completion there have been some staff turnover. The two advisors have left and have been replaced by another Environmental advisor and a Graduate environmental advisor. Also, the Environment and Sustainability Manager will depart in December and is being replaced.</p> <p>Further support is provided by an external consultant for climate change risk and</p>	<p>Check of resources and qualifications for key personnel</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>energy assessment. Regional sustainability support is 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 15/11/23</p> <p>Requirement PSR 6.3.23, requires that a standalone Sustainability Manager be appointed.</p> <p>Currently the Environmental Manager is also undertaking</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>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>Conclusion</p> <p>MiNC –</p> <p>Requirement PSR 6.3.23, requires a standalone Sustainability Manager. At present this role is currently combined with the Environmental Manager role. This issue has been raised with ARTC but has not been resolved - Carry over from Glenrowan audit 15/11/23. Post audit. It is understood that a Sustainability Manger has been appointed. Confirm next audit.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
1.6	Relationship with other documents - Environmental Framework		
Incorporates PSR 6.1.7, EMF 1.3	Environmental Framework, including: <ul style="list-style-type: none"> • Environmental Policy • Environmental Risk Assessment (ERA) • Issue-Specific Sub Plans • Environmental Green Rules • Site Environmental Plans • Environmental Protection Instructions 	Checked MCD MMS system and all framework elements in place. Conclusion Conformance	Framework elements online
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>	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. A Construction Risk Assessment Workshop for the Wangaratta platform was held on 9/5/24. No resultant changes required for the ERA.	'Live' ERA on system

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Conclusion Conformance</p>	
CEMP 2.6	SEPs		
CEMP 2.6, incorporates PSR 6.1.4	<p>Site environment plans are produced for each enhancement site...</p> <p>SEPs will detail the following:</p> <ul style="list-style-type: none"> • Overarching environmental commitment/obligation • Green rules • Contact • Written summary of environmental aspects specific to each site, with an overarching risk rating • Must statements for each aspect • Hazard identification reporting process • Community complaints notification process • Emergency response process • Maps showing: <ul style="list-style-type: none"> o Location of controls o Location of no-go areas o Location of items of significance 	<p>Each enhancement site has a Site Environmental Plan (SEP). Checked Wangaratta SEP (Rev 11/11/24) Amendments made for rock log and spill kit locations plus contact details. Seymour Avenel (Revision Date 5/2/24). Currently under revision for work details, fencing designation and contact details</p> <p>All required elements are detailed in each SEP.</p> <p>Conclusion Conformance</p>	Check of SEP requirement compliance

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> o Sensitive receivers if present o Stockpile locations o Site compound locations 		
CEMP 3.1, 3.2	Legislation Policies, Guidelines and Other Relevant Documents		
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). Since last audit the register has been reorganized into section tabs. It has been updated for FFG and Works on Waterways permits. However, regarding document control there is no longer a revision date field.</p> <p>From previous audit: One non-compliant item listed. A condition of EPR FF1</p>	Check of legal and other requirements register

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>- 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>This audit – no solution has been found to date. MCD is setting up a feasibility study.</p> <p>Conclusion</p> <p>Conformance re documentation requirements. Records show temporary non-conformance with EPR FF1</p> <p>OFI – Document control. Recently revised MCD</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		regulator and obligations register does not have a revision date field.	
PSR 6.3.12	Sustainability Management Plan		
PSR 6.3.12	<p>The Sustainability Management Plan must:</p> <ul style="list-style-type: none"> a) be a single volume for the whole of the Contractor’s Activities; b) set out the processes, methodologies and initiatives to be implemented in order to achieve the Technical Requirements for sustainability; [plus requirements c) to o)] 	<p>Checked Sustainability management plan. (Revision 3, 31/10/24, Contains required elements.</p> <p>Three external audits have been conducted. Last audit 15 April 2024. Report was pending at last audit. Final report available this audit. 1 NC for late submission of full design. Several OFIs recommended standalone trackers for material energy and water credits.</p> <p>ISP audit May 2024. Recommendation for use of non-potable water sources. However, use of farm dams is not possible. Feasibility study undertaken.</p>	<p>Checked implementation of current plan, Revision 2</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>ISP Review conducted 15/4/24.</p> <p>Two non-conformances recorded for 1) Overdue reporting to ISC on Design Round 1 and 2) Overdue Sustainability Management Plan</p> <p>Items have been submitted.</p> <p>Project reporting.</p> <p>Checked MCD monthly reporting spreadsheet including NGERS data. July 2024</p> <p>Monthly data is checked by a Regional Sustainability Manager prior to submission.</p> <p>Checked IR SRS system reporting. September 2024 (October still being completed) The Scorecard showed sustainability targets</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>on track. High confidence of achieving level 2. KPI tracking – on track</p> <p>Conclusion Conformance</p>	
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>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 9th Feb 2023)</p> <p>TPP endorsed.</p>	Check of secondary approvals

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Archaeological Management Plans by GML consultants have been completed and endorsed. GML have also completed a Heritage Protection Plan.</p> <p>Endorsed by HV – record of 2/11/23.</p> <p>Arch Mgt Plan 30/10/23.</p> <p>CHMP 17752 Glenrowan sighted. (See Section 4.5 Heritage). Conditions met.</p> <p>Landscape Management Plan – endorsed.</p> <p>Seymour Avenel Road CHMP 17401 – sighted. Conditions complied with. Checked CHMP induction records 5/9/24.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>15/2/24 FFG Permit for <i>Dianella Tarda</i> and Sticky Everlasting checked.</p> <p>Also, Inland Rail Seymour <i>Dianella Tarda</i> salvage and relocation plan 14/2/24</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. Second Yorta Yorta site inspection due</p> <p>IFC plans endorsed.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Exemptions from Heritage Permit gained for conduit installation 21/7/23. Also, an exemption for temporary removal of a staircase gained. 11/4/24 IFC drawings sent to HV as part of permit P34386 conditions 1/12/24 (post this audit)</p> <p>Conclusion Conformance</p>	
EPR EMF 4 and EPR EMF 5	No Go zones and Priority Avoidance Zones		
	Covered under assessment of CEMP 4.3 Flora and Fauna, CEMP 4.5 Heritage and SEPs	<p>PAZs are worked on progressively. So far, three overhead sites have been set up, including Seymour.</p> <p>Checked Habitat zone clearing tracker, 31 July 2024. Total amount approved for clearing</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>10.73 ha. (Not including Overhead sites) 5.61 ha vegetation cleared (2.2 Ha EPBC listed). Total avoided 5.11 ha.</p> <p>Conclusion Conformance</p>	
4.1	Air		
CEMP 4.1	<p>The air quality management plan (5-0013-110-ESS-00-PJ-0007) describes the controls and monitoring regime to be implemented to reduce the impact of dust and fumes from project construction activities.</p> <p>The purpose of this Sub-Plan is to:</p> <ul style="list-style-type: none"> • Assess the risk of construction related changes to air quality; • Provide strategies to control potential air quality impacts during construction; • Address approval, permit/ license and contractual requirements; 	<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, May 2024. Compliant. One spike on 6/11/24 not from construction work.</p> <p>Seymour Avenel Rd</p>	Inspection and records check of sub plan

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Monitor for compliance with this management plan <p>Construction Environment Management Plan INLAND RAIL: Tottenham to Albury Tranche 1 EDA & D&C Phases Page 52</p> <ul style="list-style-type: none"> • Apply contingency measures in the instance of an exceedance; and • Report on findings, exceedances and incidents to support continual improvement 	<p>No monitoring required. No nearby sensitive receivers.</p> <p>No dust suppression measures have been required to date apart from the use of a water tanker. No dust issues observed. Water tanker observed in use.</p> <p>Glenrowan Real time monitoring no longer in place.</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,</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Glenrowan 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> <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"> • Vehicle prestart • Vehicle inspections conducted for first time on site. <p>Regular inspections are made including visual daily. Weekly inspections include dust from</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>roads/stockpiles and plant & machinery.</p> <p>Checked weekly inspections - up to date for both sites.</p> <p>Checked sample of recent reports. 15/11/24 Wangaratta, Action required for SEP updating – closed out. 12/11/24 Seymour. No actions required.</p> <p>No diesel smoke of greater than 10 seconds observed.</p> <p>Site Specific Control Measures contained in the air quality management sub – plan.</p> <p>Community Engagement</p> <ul style="list-style-type: none"> • Community notifications undertaken • Site information board displays contacts 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> • Complaint process in place <p>Scheduling</p> <ul style="list-style-type: none"> • Scheduling to minimise dust impacts on high wind days has not been necessary according to MCD as dust has not been an issue. <p>Planning</p> <ul style="list-style-type: none"> • Planning vehicle movements, routes etc. has not been necessary according to MCD as dust has not been an issue. <p>Barriers</p> <ul style="list-style-type: none"> • Obstructing the path of dust transmission has not been necessary according to MCD as dust has not been an issue. 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> • Rumble grids installed. <p>Engineering controls</p> <ul style="list-style-type: none"> • Temporary stabilization using polymer mixtures has been undertaken. • Water carts used as required. • Street sweeping underway in Wangaratta and Seymour. • Regular inspections made (formal weekly). <p><i>Conclusion</i> Conformance</p>	
CEMP 4.2	Noise and Vibration		
CEMP 4.2	The construction noise and vibration management plan (5-0013-110-PES-00-PJ-0003) provides a	The construction noise and vibration management plan	Inspection and records check of sub plan

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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"> • Out of Hours work must meet the weekend/evening work hours and night period noise guideline targets (see EPA 1834) unless approved by ARTC • Details on the location and type of sensitive receiver • Noise/vibration complaints shall be responded to and assessed for further mitigation and monitoring and details provided to ARTC – Refer to section 5.5 for reporting • Proactive vibration monitoring undertaken during high-risk activities vibration activities detailed in the CNVMP • Proactive noise monitoring undertaken during high-risk activities noise activities detailed in the CNVMP • Proactive noise modelling undertaken of high-risk activities prior to activities being carried out 	<p>(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>No community complaints since the last audit.</p> <p>Checked real time monitoring since May 2024.</p> <p>Any event exceedance triggers an email notification. A number of exceedances have occurred due to short-term extraneous noise sources such as trains. None required follow up. No exceedances reported for construction noise. Checked</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Communication to neighbouring sensitive receptors on upcoming high-risk activities as per CMP • Unsealed roads will be graded regularly. Sealed access roads and hardstand areas shall have potholes filled in a timely fashion • Alternate timing of works to avoid noise sensitive times • Schedule noisy activities in least noise sensitive times • Night-time construction traffic shall be redirected away from noise sensitive receivers, in accordance with the Construction Traffic Management Plan • Appropriate construction traffic speed limits shall be established and enforced near noise sensitive receivers 	<p>sample of Wangaratta exceedances – 11/8/24 relates to train passing.</p> <p>Noisy activities are programmed for the daytime period.</p> <p>Construction speed limits have been established.</p> <p>Checked Wangaratta vibration monitoring since May 2023. No exceedances.</p> <p>A number of recent short-term noise exceedances were missing explanations.</p> <p><i>Conclusion</i> OFI – A number of recent short-term noise exceedances were missing explanations. (Carry over from Glenrowan audit 15/5/23)</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
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"> • The flora and fauna management plan (3-0013-110-PVP-00-PJ-0008) provides: <ul style="list-style-type: none"> o A detailed approach to managing flora and fauna. o Detail on the location and type of threatened species found within the project o Details on the establishment and maintenance of NGZ to prevent impacts on protected species o Details on the results of pre-construction investigations o Process for the management of injured, orphaned or deceased animals o Process for avoiding and minimizing impact to remnant native vegetation o Details of suitably qualified ecologists o Outline controls to minimize light and noise 	<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"> • Objectives and targets are being met. • Pre-Clearance Assessment 5/12/22 conducted by Habitat Management Services. • Vegetation Disturbance Permit IRT2A checked. • Fauna Interaction Register checked. 70 fauna interactions, mainly kangaroos and echidnas. No follow up required 	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>impacts on nocturnal animals</p> <ul style="list-style-type: none"> o Details on how to minimize impact on species during breeding season o Details on the tree clearing process <ul style="list-style-type: none"> • The Tree management plan (5-0013-110-ESS-00-PJ-0010) provides o Specifics for protecting trees on site as well as the tree clearing process. o Details on how to and where to install NGZ fencing and TPZ fencing o Details of suitably qualified arborists o Opportunities for re-use 	<p>except for 18/6/24 Subcontractor found a legless lizard. Work ceased; ecologist called out who relocated the legless lizard. No regulator input required.</p> <ul style="list-style-type: none"> • Since last audit two FFG permits gained for Overhead sites FFG-4 -1-2024-389, FFG-4 -1-2024-392. • Since last audit two Works on waterways permits gained for Overhead sites GBCMA-W-2024-00145, GBCMA-W-2024-0083. • Vegetation removal tracker checked. • No amphibian areas. 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> • No avian control measures required yet. <p>Other threatened species matters:</p> <ul style="list-style-type: none"> • No Golden Sun moths found. • No threatened fauna matters evident to date. <p>Tree Protection Management Plan</p> <ul style="list-style-type: none"> • Objectives and targets are being met. • Vegetation Disturbance Permits. 21 permits issued since last audit. • GIS layer used to track impacts on trees. 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<ul style="list-style-type: none"> • No Go Zones shown in the Seymour Avenel SEP. TPZs shown in the Wangaratta SEP. • TPZs are inspected weekly as per TMP requirement. <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). All constructed as per Site Environmental Plan and in good order.</p> <p>As noted in CEMP 3.1 Legislation - condition EPR FF1 requiring rope bridge</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>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> <p>Nesting boxes. In addition to the 25 boxes in place, 18 new 3D boxes manufactured from hemp, mushroom roots and paper mâché are being trialed in conjunction with the University of Melbourne.</p> <p>Conclusion MiNC – condition EPR FF1 requiring rope bridge habitat crossings at Seymour is currently not being met.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 4.4	Biosecurity		
CEMP 4.4	<p>The biosecurity management plan (5-0013-110-ESS-00-PJ-0003) provides a detailed approach to managing pest plants and animals, and pathogens on site.</p>	<p>Biosecurity management plan (5-0013-110-ESS-00-PJ-0003) is in place.</p> <p>To date, work has been on sealed roads thus no active controls are 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>Checked sample of Vehicle and Equipment checklist forms for completed Weed and Pest Hygiene Declaration Forms.</p> <p>Wangaratta - no significant issues re weeds.</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Seymour Avenel Rd – no significant issues re weeds.</p> <p>Glenrowan – no significant issues re weeds.</p> <p>Conclusion Conformance</p>	
CEMP 4.5	Heritage		
CEMP 4.5	Heritage Management is covered in the Project Cultural Heritage Management Plans (CHMPs) (summarised in Table 19) and the Archaeology management plan (5-0013-110-ESS-00-PJ-0004.)	<p>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. Checked induction records "TLAWC Inductions Master Spreadsheet"</p>	Inspection and records check of plans

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>RAP visited on 2/8/24 at the time of maximum excavation.</p> <p>Wangaratta - CHMP 17402 sighted. No issues have arisen.</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.</p> <p>Glenrowan Heritage Precinct VHR H2000 Stage 3 Archaeological Management Plan is in place.</p> <p>Conclusion Conformance</p>	
CEMP 4.6	Contamination		

No.	CEMP Requirements	Audit comments and findings	Evidence
CEMP 4.6	<p>A detailed summary of the proposed control actions for the management of contaminated and other soils for the Project is contained in the CL&SMP (5-0013-110-PES-00-PJ-0001). The key actions for the control of all spoil on site are specific to each site and the preliminary investigations. No general controls are listed in this section of the CEMP. The CL&SMP will be used as the primary source for all activities relating to contaminated land management.</p>	<p>CL&SMP (5-0013-110-PES-00-PJ-0001) is in place.</p> <p>Checked material tracking register on the EPA portal. On site movements tracked.</p> <p>From last audit: Unexpected, contaminated soil finds have occurred at Wangaratta and Glenrowan. Asbestos pipe at Glenrowan May 2024. Licensed contractor North East Insulation & Asbestos removed asbestos. Update for this audit – Clearance certificate issued, dated 14/6/24 Wangaratta. Concrete footbridges contained cement sheet. Licensed contractor North East Insulation & Asbestos removed asbestos. Update for</p>	<p>Inspection and records check of sub plan</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>this audit – Clearance certificate issued, dated 14/6/24</p> <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. Now that the construction compound fencing has been removed, the Category D soil stockpile should be taped off.</p> <p>Wangaratta The main Category D stockpile has been removed. A small, contaminated soil stockpile is on site requiring testing and disposal.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Seymour Avenel Rd Spill contaminated materials are stored in plastic bags on temporary bunds whilst awaiting disposal.</p> <p>There is a small, contaminated soil stockpile on site from an oil spill. It is adequately covered, labelled and bunt taped. A similar stockpile in the compound area has now been consolidated with this stockpile.</p> <p>Weekly inspection checklist includes contaminated soil.</p> <p>Conclusion Conformance</p> <p>OFI – Wangaratta asbestos hazard report to be logged. (from previous audit)</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>OFl – Glenrowan. Now that the construction compound has been removed, the Category D soil stockpile should be taped off.</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>Site compounds will prioritise the location of laydown areas in locations which have already been cleared or disturbed and avoid TPZs.</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 containers are marked for their contents. Sample of SDSs checked. No SDS available for Bostik AW 2700 Super Red Sprayable Contact. There were no signs of spillage at the chemical storage areas or the site compound.</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>2 of 4 spill kits (yellow wheelie bin type) checked and found to be adequately provisioned. Additionally, there are 2 smaller mobile kits available.</p> <p>4 contaminated waste wheelie bins available, however 1 wheelie bin is missing its label.</p> <p>A 20 litre container of hydraulic oil was observed next to a spill kit - not in a bunded area.</p> <p>Wangaratta.</p> <p>Flammable Liquids cabinet – checked. Printed SDSs available. Checked sample of SDSs –</p> <p>International Interzinc 315 Primer SDS not present.</p> <p>Jotun Jotaprime 505 SDS is present (wasn't present in previous audit)</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>In the Green St site shed area it was observed: 1) unlabelled 5 litre container of what appeared to be glue 2) A shipping contained some glues, epoxy primers and paint stored on a shelf without bunding/tray 3) A trailer containing an IBC of alkali free accelerator for sprayed concrete was unbunded.</p> <p>Conclusion Conformance</p> <p>OFI – Wangaratta flammable liquids cabinet. International Interzinc 315 Primer SDS not present.</p> <p>OFI – In the Green St site shed area it was observed: 1) unlabelled 5 litre container of what appeared to be glue</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>2) A shipping contained some glues, epoxy primers and paint stored on a shelf without bunding/tray. 3) A trailer containing an IBC of alkali free accelerator for sprayed concrete was unbunded.</p> <p>OFI – Seymour Avenal Road. No SDS available in the fuel/chemicals cabinet for Bostik AW 2700 Super Red Sprayable Contact.</p> <p>OFI - Seymour Avenal Road. A contaminated waste wheelie bin is missing its label.</p> <p>OFI - Seymour Avenal Road. A 20 litre container of hydraulic oil was observed next to a spill kit - not in a bunded area.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>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>In the previous audit it was noted that there is evidence of a minor sediment washout from a soil stockpile behind the compound; however, it has not washed offsite and a sediment fence erected since that audit.</p> <p>Daily street sweeping is undertaken.</p> <p>Conclusion Conformance</p>	
EPR W1	Waste		
EPR W1	The Contractor must develop a Waste Management Plan (WMP), in consultation with ARTC and local Council, which outlines how waste will be managed throughout the project	Waste Management Plan in place.	Inspection and records check of controls

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Waste Stream Register – checked. Construction Diversion rate 95.3% Office 13.7% - there is an anomaly with JJ Richards figures based on skip loads, no scales used. Also, there is some diversion of beverage cans subsequent to the container deposit scheme coming into place. These matters are to be resolved.</p> <p>Office waste stream quantities input to sustainability reporting.</p> <p>Waste contractor JJ Richards reports quarterly.</p> <p>Wangaratta and Seymour Avenel Rd sites make use of concrete washout bags.</p> <p>Wangaratta and Seymour Avenel Rd sites.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<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 and construction waste skips occasionally contained quantities of non-recyclable coffee cups. This cross contamination has improved since the last audit.</p> <p>Wangaratta site. Skips are available for concrete, general and steel skips. There was some general waste contamination in the concrete skip. Suggest that signage is placed on the fence behind the skips to designate the waste skip types.</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>Also, two yellow wheelie bins are unlabelled.</p> <p>Reuse practices:</p> <ul style="list-style-type: none"> • Clean but broken wooden rail sleepers are reused for landscaping. • Concrete sleepers removed for decommissioned tracks reused in Heywood railway project (ARTC). • Concrete rail sleepers are reused as wheel stops. • Cleared vegetation is mulched and reused in landscaping. • Concrete waste is taken offsite to Wodonga Recyclers. • Tree stumps have been donated to the 	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>local CMA for stream health in the Goulburn River catchment.</p> <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 2024 (by Head Office).</p> <p>Conclusion Conformance OFI –Wangaratta. Two yellow wheelie bins are unlabelled.</p> <p>OFI – Wangaratta. Suggest that signage is placed on the fence behind the skips to</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>designate the waste skip types.</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 presented on the SEPs will be added. Key items of note will be:</p> <ul style="list-style-type: none"> • Site access locations • Site speeds • Haul roads • Changes to property access • Sensitive receivers 	<p>A traffic management plan (TMP) has been prepared and is available on site.</p> <p>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 the day of audit.</p>	<p>Inspection and records check of controls</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<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>Checked Seymour Avenal VMP 5-0013-110-PMA-60-PJ-0001</p> <p>Conclusion Conformance</p>	
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, next</p>	<p>Inspection and records check of controls, including spill management.</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
		<p>one due March 2025– other sites EPI reinforced.</p> <p>Wangaratta and Seymour Avenel Rd sites Checked spill kits onsite – kits contained full contents and labelled.</p> <p>Conclusion Conformance</p>	
CEMP 5.0	Monitoring and Inspections		
	<p>Monitoring and Inspections at a program level are detailed in this CEMP Table 23 & Table 24). Aspect specific monitoring requirements are described in the individual sub-plans.</p> <p>MCD will undertake environmental monitoring, and retain records relating to the monitoring as detailed in section 5.2. Monitoring parameters are contained in section 5.2 of this plan or in the appropriate sub-plan for aspect specific activities (Air, Noise, Vibration etc).</p> <p>The Contractor must undertake additional</p>	<p>Monitoring requirements are described in the individual sub-plans.</p> <p>Conclusion Conformance</p>	<p>Checked sample of records providing evidence of required inspections and monitoring</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>monitoring at the direction of ARTC in response to Environmental Events, complaints, non-compliances or a change in the MCDs Activities.</p>		
CEMP 5.5	Event Reporting and Investigation		
	<p>All events, including near misses will be reported and managed in accordance with MCD Management System requirements. Where an event has occurred on site, the Construction Manager shall be notified immediately, who will inform the Project Director and the Environmental Manager.</p> <p>MCD will notify ARTC in accordance with the Environmental Event management process, 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>Incident reports including near misses are logged in ArcGIS, then CMO Dashboard. Environmental officers now have access to all incidents on the system.</p> <p>Incidents since last audit (as per CEMP 1.4 above):</p> <p>Conclusion Conformance</p>	<p>Checked sample of records providing evidence of event reporting and investigation</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<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>		
CEMP 5.6	Audits		
	<p>The Environment & Sustainability Manager will initiate and implement scheduled internal and external audits for each phase of the Project. Additional audits will be programmed if a product or system non-conformance within the Project raises significant areas of concern. A copy of all audit's reports, including the non-conformances with corrective and preventive actions will be provided to the Client...</p> <p>The Project audit schedule (2004-MCD-PRW-QAC-</p>	<p>Checked audit schedule 2069-MCD-PRW-QAC-SCH-0001 Inland Rail Project Audit Schedule 18/10/2024. Audits being conducted as per schedule.</p> <p>An internal ISO 14001 audit was conducted on 20/6/24. 1 minor non-conformance for Green rules controls relating</p>	<p>Records check Audit schedule</p>

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>to 1) sediment controls at Wangaratta in relation to erosion of batters could be improved 2) Avenal Seymour. Ground protection around stockpiles could be improved. Corrective actions undertaken.</p> <p>An ARTC audit was conducted 6-8/8/24. 1 non-conformance recorded for a shared Obligations register to be reinstated. This has been corrected</p> <p>Also, one OFI for some reporting requirements not listed in the monthly report. (However, MCD note that the missing items had no content to report)</p> <p>ISP Review conducted 15/4/24. (See PSR 6.3.12</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
		Sustainability Management Plan) Two non-conformances recorded for 1) Overdue reporting to ISC on Design Round 1 and 2) Overdue Sustainability Management Plan Review Items have been submitted. Conclusion Conformance	
CEMP 5.7	Continuous Improvement		
	Continual improvement is at the forefront of MCD organization. It is embodied in the objectives and quality policy. 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	Lessons learnt are kept in the Environmental Risk Assessment Rev D – checked list of lessons learnt. No new entries since last audit. Conclusion	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>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>	Conformance	
CEMP 6.1	Communication of Environmental Information		
	<p>All personnel (inclusive of MCD subcontractors) shall receive training of a type and level of detail that is appropriate for their role. At a minimum, all personnel working at site will be given a Project induction prior to commencing any work.</p> <p>Other types of mechanisms of covering environmental awareness are through HSEQ alerts and more specialised training. For all training provided by the Project, attendance records and assessments of training will be maintained by the HSE admin. This information is stored in the project induction/training matrix.</p>	<p>Checked project induction presentation material (18/11/24).</p> <p>The induction material covered the aspects listed in the CEMP induction requirements.</p> <p>Checked sample of daily bulletins. Bulletin issued for 21/8/24 included sediment controls.</p> <p>Conclusion Conformance</p>	Records check
CEMP 6.2	Reporting		
	Compliance reporting requirements are detailed in	Reporting requirements:	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>section 5 of this report. Specific environmental reporting requirements associated with the Project contract and expectations are:</p> <p>Monthly reporting to ARTC. The monthly report shall be submitted to ARTC within 5 business days of the end of month and include (but not limited to)</p> <ul style="list-style-type: none"> • The D&C Contractor’s updates to their respective CEMP and subplans. • Compliance status of requirements of any obligations obtained for activities as part of the D&C Contractor’s activities and the works. • Completed site inspections, including number of inspections completed and open and closed corrective actions raised and completed. • Summary of environmental events for the month and open and closed corrective actions and lessons learned. • Pre-clearance surveys completed including details of the monthly and cumulative totals of vegetation that has been cleared and fauna 	<ul style="list-style-type: none"> • Monthly reporting is being carried out. Sighted monthly reports for October 2024 report sampled contained required elements. As part of this reporting an updated Obligations Register (sighted) is submitted. Checked Obligations Register <p>Conclusion Conformance</p>	

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

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>management system to ensure its continuing suitability, adequacy and effectiveness.</p> <p>The 12 monthly EXCO review includes consideration of:</p> <ul style="list-style-type: none"> • The status of actions from previous management reviews. • Changes in: <ul style="list-style-type: none"> - External and internal issues that are relevant to the environmental management system. - The needs and expectations of interested parties, including compliance obligations. - Its significant environmental aspects. - Risks and opportunities. - The extent to which environmental objectives have been achieved. - Information on the organisation’s environmental performances, including trends in: <ul style="list-style-type: none"> - Nonconformities and corrective actions. - Monitoring and measurement results. - Fulfilment of its compliance obligations. - Audit results. 	<p>Conclusion</p> <p>Not able to be audited</p>	

No.	CEMP Requirements	Audit comments and findings	Evidence
	<ul style="list-style-type: none"> • Adequacy of resources. • Relevant communication(s) from interested parties, including complaints. • Opportunities for continual improvement. 		
CEMP 7.2	Project Management Review		
	<p>Review of the implementation and effectiveness of this plan and associated documents will be performed on an annual basis as minimum, by the Project management team. The responsibility for this review lies with the Project Manager.</p> <p>The review will include:</p> <ul style="list-style-type: none"> • Progress of the implementation of this plan. • Effectiveness of this plan. • Adequacy of resources. • Effectiveness of training and training requirements. • Results of inspections and audits. • Critical non-conformances or repeated non-conformances. • Overall performance against environmental compliance obligations. • Organisational changes, changes to legislation 	<p>Management Review conducted 9/5/23 however this related large to quality aspects of the project and not specifically a CEMP review.</p> <p>A CEMP Review due for Q3, 2024 has not been undertaken. However, a review is now due for January 2025.</p> <p>A CEMP Project Management Review has not been undertaken as per the requirements of CEMP 7.2</p> <p>Conclusion</p> <p>MiNC – A CEMP Project Management Review has not</p>	Records check

No.	CEMP Requirements	Audit comments and findings	Evidence
	<p>and other obligations.</p> <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>	<p>been undertaken as per the requirements of CEMP 7.2.</p>	
CEMP 8.0	Lessons Learnt		
	<p>Lessons learnt and continued improvement is detailed in this CEMP. A snapshot lessons learnt summary is included as Appendix 5. This will be updated as the Project progresses, and learnings are identified.</p> <p>MCD, as part of the continual improvement process will review the efficacy of environmental compliance as detailed in this document and capture lessons within the lessons learnt register.</p>	<p>See CEMP 5.7 Continuous Improvement.</p> <p>Conclusion Conformance</p>	Records check

Findings

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

Findings
<p>CEMP 1.5 Roles and Responsibilities</p> <p>MiNC – Requirement PSR 6.3.23, requires a standalone Sustainability Manager. At present this role is currently combined with the Environmental Manager role. This issue has been raised with ARTC but has not been resolved - Carry over from Glenrowan audit 15/11/23. Post audit. It is understood that a Sustainability Manger has been appointed. Confirm next audit.</p>
<p>CEMP 3.1, 3.2 Legislation</p> <p>OFI – Document control. Recently revised MCD regulator and obligations register does not have a revision date field.</p>
<p>CEMP 4.2 Noise and Vibration</p> <p>OFI – A number of recent short-term noise exceedances were missing explanations. (Carry over from Glenrowan audit 15/11/23)</p>
<p>CEMP 4.3 Flora and Fauna</p> <p>MiNC – Condition EPR FF1 requiring rope bridge habitat crossings at Seymour is currently not being met.</p>
<p>CEMP 4.6 Contamination</p> <p>OFI – Wangaratta asbestos hazard report to be logged. (from previous audit)</p> <p>OFI – Glenrowan. Now that the construction compound has been removed, the Category D soil stockpile should be taped off.</p>

Findings
<p>CEMP 4.7 Hazardous Chemical Storage</p> <p>OFI – Wangaratta flammable liquids cabinet. International Interzinc 315 Primer SDS not present.</p> <p>OFI – In the Green St site shed area it was observed: 1) unlabelled 5 litre container of what appeared to be glue 2) A shipping contained some glues, epoxy primers and paint stored on a shelf without bunding/tray. 3) A trailer containing an IBC of alkali free accelerator for sprayed concrete was unbunded.</p> <p>OFI – Seymour Avenal Road. No SDS available in the fuel/chemicals cabinet for Bostik AW 2700 Super Red Sprayable Contact.</p> <p>OFI – Seymour Avenal Road. A contaminated waste wheelie bin is missing its label.</p> <p>OFI – Seymour Avenal Road. A 20 litre container of hydraulic oil was observed next to a spill kit - not in a bunded area.</p>
<p>EPR W1 Waste Management</p> <p>OFI – Wangaratta. Two yellow wheelie bins are unlabelled.</p> <p>OFI – Wangaratta. Suggest that signage is placed on the fence behind the skips to designate the waste skip types.</p>
<p>CEMP 7.2 Project Management Review</p> <p>MiNC – A CEMP Project Management Review has not been undertaken as per the requirements of CEMP 7.2.</p>