

Inland Rail - Beveridge to Albury, Phase 1, Tranche 2 Project (B2A)

IEA Six-Monthly Environmental Audit Report – May 2025

26th June 2025

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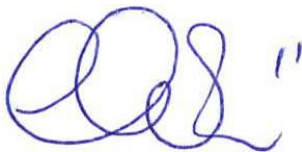
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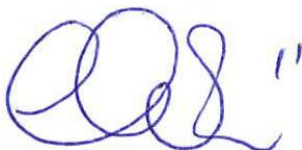
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This report has been prepared for John Holland in accordance with the terms and conditions of appointment of the Independent Environmental Auditor for the Inland Rail Tranche 2 (Beverage to Albury), dated 28 August 2024. Arcadis Australia Pacific Pty (ABN 76 104 485 289) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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FIGURES

Figure 1 Schematic of Inland Rail Beveridge to Albury works and enhancement site (taken from EMF) ... **Error! Bookmark not defined.**

Abbreviations

Abbreviation	Definition
ARTC	Australian Rail Track Corporation
B2A	Beveridge to Albury (the Project)
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
DCCEEW	Department Climate Change, Energy, Environment and Water
DEECA	Department of Energy, Environment and Climate Action
DTP	Department of Transport and Planning
EMF	Environmental Management Framework
EMP	Environmental Management Plan
EMS	Environmental Management System
EPBC	Environmental Protection and Biodiversity Conservation Act
EPR	Environmental Performance Requirement
ERA	Environmental Risk Assessment
FFMP	Flora and Fauna Management Plan
GWMP	Groundwater Management Procedures
IEA	Independent Environmental Auditor
IRPL	Inland Rail Pty Ltd
JH	John Holland
NCR	Non-conformance Report
PSR	Project Scope & Requirements
SEP	Site Environmental Plan
SWMP	Surface Water Management Procedures
SQE	Safety, Quality, Environment
TrMP	Tree Management Plan

Executive Summary

Introduction and Overview

The Inland Rail Environmental Management Framework (EMF) mandates the appointment of an Independent Environmental Auditor (IEA) to assess compliance with the EMF, Environmental Performance Requirements (EPRs), CEMP, and other relevant sub-plans and project approval conditions.

This report summarises the results of the first six-monthly environmental audit for Inland Rail - Beveridge to Albury Phase 1 Tranche 2 Project (B2A) (the Project), covering the period from commencement of works (excluding preparatory works) through to May 2025. This audit was conducted by the Independent Environmental Auditor team on May 14th and May 15th, 2025. This report has been written as an exception report highlighting audit findings raised and associated audit commentary (Appendix A).

Summary of Findings

- **Findings Raised:** Sixteen (16) findings were identified, comprising:
 - Two (2) non-conformances.
 - Nine (9) opportunities for improvement.
 - Five (5) observations.

Audit Conclusion

The IEA considers that the audit findings do not currently represent a significant material risk to on-ground environmental management for the scope of works being undertaken.

1 Environmental Management Requirements

1.1 Project Overview

The Inland Rail - Beveridge to Albury Phase 1 Tranche 2 Project (B2A) is the second of the brownfield rail packages to be tendered and consists of the remaining 8 of 12 sites on this section of the Victorian Corridor (Tranche 1 consisting of 4 sites was awarded to McConnell Dowell + Aurecon in 2022). The B2A section of Inland Rail encompasses works along 305km of existing rail corridor from Beveridge just north of Melbourne to Albury on the VIC/NSW border. These Head Contract Works will see various enhancements and reconstructions of existing structures to increase height clearances along the rail line (to 7.1m) to enable the operations of 1,800m double stacked trains. Head Contract Works include local road upgrades and/or enhancements to station/community precincts at the following 8 sites (Figure 1):

- **Broadford-Wandong Road, Wandong**
- **Hamilton Street, Broadford**
- **Short Street, Broadford**
- Marchbanks Road, Broadford
- Hume Freeway, Tallarook
- Hume Freeway, Seymour
- **Euroa Station Precinct, Euroa**
- **Benalla Station Precinct, Benalla**

Note: Enhancement sites are bolded



Figure 1 Schematic of Inland Rail Beveridge to Albury works and enhancement site (taken from EMF)

1.2 Environmental Management Framework

The Inland Rail Environmental Management Framework (EMF) covers the Victorian portion of Beveridge to Albury. The purpose of the EMF is to provide a transparent and integrated governance framework for the project and accountabilities for the delivery and monitoring of the implementation of the Environmental Performance Requirements (EPRs). The EPRs are a suite of performance-based standards that apply to the design and construction of the Project. On 23 August 2020 the Minister determined that an EES was not required for Inland Rail – Beveridge to Albury, subject to two conditions including the requirement for preparation of an Environment Report and an EMF in consultation with Department Environment, Land, Water and Planning (DELWP) (EES referral number 2020-07).

1.3 Primary Approvals

1.3.1 EPBC

The Project was determined to be a controlled action (EPBC 2020/8721) due to the likelihood of the Project having a significant impact on one or more Matters of National Environmental Significance (MNES), namely:

- Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-Eastern Australia, and
- Euroa guinea-flower (*Hibbertia humifusa* subsp. *erigens*).

1.3.2 CHMP

Sections of the Project are within areas of Aboriginal cultural heritage sensitivity due to the presence of registered cultural heritage places and named waterways as defined in the Aboriginal Heritage Regulations 2007 (Vic). Given the spatial extent of the Project, four CHMPs have been approved in consultation with the Yorta Yorta Nation Aboriginal Corporation and the Taungurung Land and Waters Council Aboriginal Corporations.

Table 1 Summary of CHMPs

CHMP Number	Registered Aboriginal Party	Area
CHMP 17752	Yorta Yorta Nation Aboriginal Corporation	Glenrowan Enhancement site
CHMP 17402	Yorta Yorta Nation Aboriginal Corporation	Benalla and Wangaratta Enhancement sites
CHMP 17401	Taungurung Land and Waters Council Aboriginal Corporation	Tallarook, Seymour and Euroa Enhancement sites
CHMP 17862	Taungurung Land and Waters Council Aboriginal Corporation	Wandong and Broadford Enhancement sites

1.3.3 Incorporated Document

An amendment to the Whittlesea, Mitchell, Strathbogie, Benalla, Wangaratta and Wodonga Planning Schemes (the Planning Schemes) has been prepared for the Project and was gazetted in March 2022. The Amendment introduced the 'Inland Rail – Beveridge to Albury April 2021' Incorporated Document (GC157) into the Planning Schemes to facilitate the use and development of the Project land for the purpose of the Project (excluding overhead powerline replacement works outside enhancement sites and native vegetation removal for preparatory works).

2 Role of the IEA

The IEA's role and responsibilities are prescribed by the Project Scope and Technical Requirements (PS&TR) and Environmental Management Framework (EMF).

Table 2 Requirements of the IEA

Document	Extracted Requirement
PS&TR – RFT Section D - Annexure F - Management Requirements	<p>2.18.1 ENVIRONMENTAL AUDITS</p> <p>a) The Contractor shall undertake an environmental audit, (utilising an Independent Environmental Auditor (IEA)) within 6 months of Project commencement, then 6-monthly during construction thereafter for the duration of the Contractor's activities. An audit will also be undertaken at the completion of the works to confirm all rehabilitation requirements as stated in the Landscape Management Plan (LMP) and Reinstatement and Rehabilitation Plan (RRP) have been met; this should be completed in collaboration with the ARTC Environment Team.</p> <p>b) The Contractor's environmental audit program shall be detailed in their respective Construction Environmental Management Plan (CEMP), including any subcontractors engaged by the Contractor, and confirm conformance with:</p> <p>i. Contractor's environmental management requirements detailed in the Environment Management Framework (EMF), the CEMP, and the Environmental Performance Requirements (EPRs);</p> <p>ii. the requirements of the Contract; and</p> <p>iii. AS/NZS ISO 14001:2015.</p> <p>c) The IEA Audit Report shall be delivered by the Contractor to ARTC within two (2) weeks of audit completion, in the format agreed with ARTC.</p> <p>d) The Contractor shall document any non-conformances identified during audits, which shall also be reported accordingly in the monthly environment report.</p>
EMF Glossary of Terms – Independent Environmental Auditor	Undertakes environmental reviews and audits of project activities including assessing compliance with the Environmental Management Systems (EMS), Environmental Management Framework (EMF) and Environmental Performance Requirements (EPR's) Construction Environment Management Plan (CEMP) and other sub-plans.
EMF Roles & Responsibilities – IEA	<ul style="list-style-type: none"> • Prior to commencement of enhancement site and powerline works, review the Contractor's systems and plans to ensure they are adequate for compliance with this EMF, relevant EPRs, CEMP, and any other plans required by the EPRs, and conditions of Project approvals • Conduct regular audits (every six months) of Contractors' compliance with this EMF, relevant EPRs, CEMP, and any other plans required by the EPRs, conditions of Project approvals, and as required by ARTC • Prepare a six-monthly audit report summarising the Contractor's compliance and results of audits and provide to ARTC and the Contractor(s)

Document	Extracted Requirement
	<ul style="list-style-type: none"> Review complaints referred by ARTC relevant to the EPRs.
EMF Roles & Responsibilities – D&C Contractor	<ul style="list-style-type: none"> Appoint a qualified and experienced Independent Environmental Auditor (IEA) to confirm compliance with the Project's EMS, the EMF, EPRs, CEMP, and other sub-plans as and D&C Contract. The IEA will prepare environmental compliance reports (frequency to confirmed with Department of Climate Change, Energy, the Environment and Water (DCCEEW) and DELWP). These reports will be published on the ARTC website.
EMF Section 5.7 – Independent Environmental Auditor	<p>An IEA engaged by the D&C Contractor shall undertake an audit at within six months or Project commencement and six-monthly thereafter to audit the D&C Contractors' compliance with this EMF, relevant EPRs, CEMP, and any other plans required by the EPRs, conditions of Project approvals, and as required by ARTC.</p> <p>The IEA will produce compliance reports to be provided to ARTC and D&C Contractor, these reports will be published on the ARTC website.</p> <p>ARTC will publish environmental compliance reports to the Project's website, within 60 days of receipt (Note: any Sensitive Ecological information is to be redacted prior to publication).</p>
EMF EPR EMF7 – Independent Environmental Auditor (IEA)	<p>The Contractor must engage a suitably qualified and experienced IEA with expertise appropriate to allow them to fulfil their roles as specified in the EMF. The IEA will conduct six-monthly audits and prepare six-monthly summary audit reports to be provided to ARTC and the Contractor. Audits must occur during construction and for five years after construction (responsibility will be handed over to ARTC following construction phase) of the Inland Rail Beveridge to Albury Project, or as otherwise agreed with the Minister of Planning. A six-monthly summary report must be provided to the Minister for Planning that summarises the findings of the audits carried out during the reporting period. The summary reports must be made publicly available on a Project website for the period of construction and a minimum of five years after construction is complete.</p>

3 Overarching Audit Approach

3.1 Objectives, scope and criteria

The audit objectives and scope for each audit is confirmed through the following pre-audit activities:

- Review of the Development Phase Program to identify Project activities and associated environmental risks, informing which environmental aspect is relevant.
- Status of design.
- Review CEMP, and other subplans (and all components within) required by the EPRs.
- Review relevant aspect-specific EPRs.
- Review relevant approvals and associated conditions.
- Review previous audit scope and findings.
- Confirmation of overall audit program considering the above tasks.
- Development of audit criteria considering the above tasks into an audit tool (i.e. checklist).

3.2 Methodology

The overall process for each audit includes the following:

- Audit opening meeting
- Review of open findings from previous audits
- Review of relevant Project environmental records relevant to audit criteria
- Interviews with relevant Project environment and site personnel relevant to audit criteria
- Observation of construction activities on active sites that provides evidence relevant to audit criteria.
- Audit close out meeting.
- Remaining evidence to be obtained by the Contractor (if required).

Following the completion of the audit results are drafted and provided to the Contractor for review and comment on matters of fact. The audit report is then provided to the IRPL for upload onto the Project website.

3.3 Finding Classifications

The audit finding classifications are found below in Table 3. For this audit report all findings that are “Conformance” or “Not Applicable” will not be included. As this report follows an exception report format, all other finding classifications with associated audit commentary will be included in Appendix A. Section 6.1 will summarise Contractor’s performance associated with “conformance” and “not applicable” criteria that was audited during this audit.

Table 3 Finding Classifications

Classification	Description
Conformance	There is suitable evidence to confirm that actions have been undertaken, prepared and/or implemented in full conformance with the requirements of the auditable element.
Non-conformance	An instance, event or occurrence that has not fulfilled a requirement that has been specified in the CEMP, EPRs, legislation and approval conditions. A situation, which

Classification	Description
	would, on the basis of available objective evidence raise significant doubt as the effectiveness of environmental management.
Opportunity for improvement	A deficiency in the implementation of the CEMP or associated documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
Observation	An audit finding which may relate to an incidental or isolated system discrepancy, which does not compromise the effectiveness of environmental management, or constitute an actual or potential environmental risk
Not Applicable	The auditable element falls outside the scope of the audit, e.g. work relevant to the element being audited has not yet commenced.

3.4 Audit Limitations

This report was prepared in accordance with generally accepted consulting practice for audit services. The environmental audit requires the IEA to apply a process of “general overview and reasonable checking” of the Project documentation and Design and Construction activities (as required under the contract between the IEA and John Holland). The auditing activities use a risk-based approach, targeting those Design and Construction activities with a potential for risk to the environment or to environmental management arrangements. Accordingly, it is possible that not all environmental issues will be examined during each audit. However, the IEA maintains a structured program of audits designed to cover all aspects of the Project and to enable the formation of an opinion on whether there is compliance with the requirements of the EMF, CEMP (and subplans), and the EPRs (as applicable).

4 Six-monthly Environmental Audit

4.1 Audit Objectives, scope and criteria

The first six-monthly environmental audit was conducted by the Independent Environmental Auditor team on May 14th and May 15th, 2025. This audit covered the period from commencement of works (excluding preparatory works) through to May 2025. Day 1 of the audit was held in the Arcadis Melbourne office, day 2 of the audit was conducted on site.

4.1.1 Sites and Construction Activities Audited

Table 4 Sites and construction activities audited

Sites	Activities	Audited
Broadford-Wandong Road, Wandong	<ul style="list-style-type: none"> Vegetation Removal 	Yes
Hamilton Street, Broadford	<ul style="list-style-type: none"> Vegetation Removal Utility relocations 	Yes
Short Street, Broadford	<ul style="list-style-type: none"> Vegetation Removal Utility relocations 	Yes
Marchbanks Road, Broadford	<ul style="list-style-type: none"> Site Establishment 	Yes
Hume Freeway, Seymour		No
Euroa Station Precinct, Euroa	<ul style="list-style-type: none"> Demolition Vegetation Removal Utility Relocations Site Establishment Earthworks 	Yes
Benalla Station Precinct, Benalla		No
Hume Freeway, Tallarook	<ul style="list-style-type: none"> Vegetation Removal 	Yes

4.1.2 EPRs Audited

A total of 32 EPRs were audited during the May 2025 audit.

Table 5 EPRs audited

Environmental Aspect	Environmental Performance Requirement
Environmental Management Framework	<ul style="list-style-type: none"> EMF1: Environmental Management System (EMS) EMF2: Construction Environmental Management Plan (CEMP) EMF3: Environmental Risk Assessment EMF4: No Go Zones (NGZs) EMF5: Priority Avoidance Zones (PAZs) EMF6: Training

Environmental Aspect	Environmental Performance Requirement
	<ul style="list-style-type: none"> EMF7: Independent Environmental Auditor (IEA)
Aboriginal Cultural Heritage	<ul style="list-style-type: none"> AC1: Cultural Heritage Management Plan (CHMP)
Flora and Fauna	<ul style="list-style-type: none"> FF1: Flora and Fauna Management Plan (FFMP) FF3: Temporary occupation FF5: Existing Tracks FF6: Tree Removal FF7: Lighting FF8: Night-time works FF9: Wildlife Handler and Pre-clearance Surveys FF10: EPBC Listed – Striped Legless Lizard (<i>Delma impar</i>) FF13: Design Opportunities – Avoiding Native Vegetation Impacts FF14: Planning Permit Application(s) – Removal of Native Vegetation
Groundwater	<ul style="list-style-type: none"> GW1: Groundwater Management Procedures (GMPs) GW2: Groundwater Monitoring – Broadford, Seymour, Wangaratta and Barnawartha North GW3: Groundwater Monitoring – Benalla and Euroa
Noise and Vibration	<ul style="list-style-type: none"> NV1: Construction Noise and Vibration Management Plan (CNVMP) NV2: Dilapidation Survey NV3: Building Condition Surveys NV4: Noise Monitoring NV5: Construction Staging NV6: Plant and Equipment Selection NV7: Plant and Equipment NV8: Plant and Equipment - Modifications NV9: Out of Hours Work (OOHW) NV10: Construction Traffic
Utilities	<ul style="list-style-type: none"> U1: Utility Assets

4.1.2.1 Not Applicable EPRs

Several EPRs are classified as “Not-applicable” mainly due to responsibility of the requirement and scope of Inland Rail - Beveridge to Albury Phase 1 Tranche 2 Project (B2A). These are included in Table 7 below.

Table 6 EPRs classified as “not applicable”.

Requirement	Commentary
EPR EMF 08 Operational Handover	As per CEMP (5-0105-112-PMA-00-PL-0068, Rev 0) Table 5; this EPR is not applicable, this is for the operational phase.
EPR FF2 EPBC Listed – Powerline Project Area 1047 and Modelled Habitat	JH is not delivering any scope of works within Powerline Project Area 1047 so this EPR is not applicable.

Requirement	Commentary
EPR FF4 Earthworks – Powerlines Project Area	JH is not delivering any scope of works within Powerline Project Areas, so this EPR is not applicable.
EPR FF11 EPBC Listed – Powerline Investigation Areas 1001 and 1002, and Track Slew Wallan	JH is not delivering any scope of works within Powerline Project Areas 1001 and 1002 or delivering Track Slew at Wallan, therefore this EPR is not applicable
EPR FF12 EPBC Listed – Powerline Investigation Area 1110	JH is not delivering any scope of works within Powerline Project Area 1110, therefore this EPR is not applicable

4.1.3 Documentation Audited

Table 7 Documentation audited

Environmental Aspect	Document Number	Document	Revision
Environmental Management	5-0105-112-PMA-00-PL-0068	Construction Environmental Management Plan	Rev 0
Flora and Fauna	5-0105-112-PMA-00-PL-0046	Flora and Fauna Management Plan	Rev 1
Noise and Vibration	5-0105-112-PMA-00-PL-0048	Construction Noise and Vibration Management Plan	Rev 0
Arboriculture	5-0105-112-PMA-00-PL-0044	Tree Management Plan	Rev 0
Groundwater	5-0105-112-PES-00-PR-0002	Groundwater Management Procedures (appendix to the CEMP)	Rev C

5 Audit Findings

5.1 Contractor Performance

During the audit conformance was demonstrated for more than 79% of the criteria audited (does not take in account the “not applicable” category). It was observed on-ground positive environmental impact where the Contractor has strived not to only meet conformance but exceed this in some cases. For example, EPR FF1 Flora and Fauna Management Plan (FFMP), it was observed that there were numerous examples of reuse of cleared vegetation including the reuse of logs and branches for habitat enhancement initiatives for species including Platypus and Golden Perch. The team demonstrates a proactive approach in finding uses for all cleared vegetation that will provide other beneficial uses back to the community and for fauna habitat enhancements.

5.2 Summary of Audit Findings

This report has been written as an exception report highlighting audit findings raised and associated audit commentary (Appendix A).

Of the 32 EPRs audited, 25 were found compliant, and seven had findings raised against them.

Table 8 Overall audit findings raised from this audit

Finding classification	EPRs	CEMP & Subplans
Non-conformance	1	1
Opportunity for Improvement	2	7
Observation	4	1
Total	7	9

5.3 Audit Conclusion

Overall, the IEA considers that the audit findings do not currently represent a significant material risk to on-ground environmental management for the scope of works being undertaken.

Appendix A – Audit Findings

Finding ID	Audit Criteria	Audit Finding	Audit Commentary	Audit Finding	Evidence
May-25_EPR_EMF_03	EPR EMF 03 Environmental Risk Assessment The Contractor, in collaboration with ARTC, must undertake and maintain a current Environmental Risk Assessment (ERA) which will be updated in response to changes to design or construction activities. The ERA must be undertaken in accordance with AS/NZS ISO 31000:2009 Risk management -Principles and guidelines and the EPA Victoria Publication 1695.1: Assessing and controlling risk: A guide for business.	Opportunity for improvement	An Environmental Risk Assessment was undertaken at the beginning of the Project, first internally and then subsequently workshopped with IRPL. The underpinning environmental risk register was sighted in the audit and captured high ranking environmental risks including noise and vibration, spoil, and asbestos. To inform the ERA a risk assessment workshop was undertaken with the Project Director and Construction Manager in attendance. The IEA noted that there were no representatives from the design team at the risk workshop and this presents a potential limitation to the risks and opportunities identified as evidenced by the single design risk captured in the environmental risk register; this is raised as a finding. The Contractor stated that the risk register is maintained as a live document updated at least annually. The next update is due to occur in June 2025. The Contractor stated that updates to the environmental risk register can be undertaken out of cycle due to matters such as design changes, however this has not been required to date. Significant risks from the environmental risk register get carried over to the Workplace Risk Register (Workplace Risk Assessment (WRA)- B2A T2- Rev 0) which was sighted during the audit. The WRA then informs the development of the Activity Method Statements (AMS) and Site Environment Plans (SEPs). Refer also finding May-25_CEMP_06.	May-25_EPR_EMF_03 Environmental Risk Assessment Workshop There was no design representation at the workshop and only one design risk was captured. This is raised as an Opportunity for Improvement.	5-0105-112-PES-00-RA-0001_0_B2A Environmental Risk Assessment, dated 27/06/2024. Workplace Risk Assessment (WRA)- B2A T2- Rev 0
May-25_EPR_EMF_04	EPR EMF04 No Go Zones (NGZs) The Contractor must define No Go Zones (NGZs) in the CEMP where Project construction activities and works are not permitted. The NGZs must be established prior to commencement of relevant construction activities or works to protect retained areas of native vegetation, areas of significant ecological or heritage values, and where appropriate ensure construction activities and works avoid areas of contaminated soil. The NGZs must identify all threatened species and threatened ecological communities close to works to prevent unintentional impacts and be provided with suitable buffers, as informed by a qualified ecologist. The NGZ must be established utilising fencing that is; clearly visible, wildlife friendly and provides appropriate protection and signage identifying the area as a 'No Go Zone'. The location and the NGZs will be based on the final Project design and will be detailed in the FFMP prepared in consultation with, and to the satisfaction of DELWP. NGZs will be clearly marked on all maps and construction drawings prior to works commencing in proximity to the NGZ. NGZs will be maintained until the completion of works that may impact (including indirectly or accidentally) on	Observation	On-site implementation of NGZs were observed at multiple locations. For example, at Marchbanks a NGZ for a scar tree was observed with fencing and signage (Photo 1). It was observed in Environment Inspection (INS-0085816) that there was an action raised in Soteria to establish NGZ fencing prior to commencing works within that area. The EPR specifically requires that "NGZs must be established prior to commencement of relevant construction activities". However, during the audit It was observed that the NGZ in Tree Clearing Permit (PER/B2A/00066) was not installed prior to the removal of trees due to the proximity to the road; works were managed to ensure minimal impact on ground. This rationale was not documented in the Tree Clearing Permit. This is raised as a finding. The Contractor reported that the general process followed for clearing involved a Pre-Clearing Inspection completed by the ecologist with an environment team representative utilising the Arborist Impact Assessment to mark trees for removal with a pink cross (Photo 1).	May-25_EPR_EMF_04 No Go Zones (NGZs) The NGZ in Tree Clearing Permit (PER/B2A/00066) was not installed prior to the removal of trees. The rationale for this was not documented in the Tree Clearing Permit. This is raised as an Observation.	Photo 1_15/05/25_NGZ at Marchbanks PER/B2A/00066 Tree Clearing Permit Inspections_INS-0085816_20250515_1514

Finding ID	Audit Criteria	Audit Finding	Audit Commentary	Audit Finding	Evidence
	the significant ecological or heritage values protected by the NGZ.				
May-25_EPR_AC_01	EPR AC01 Cultural Heritage Management Plan (CHMP) Implement and comply with CHMPs 17752, 17402, 17401 and 17862 approved under the <i>Aboriginal Heritage Act 2006</i> .	Observation	<p>The Project currently has three active CHMPs:</p> <ul style="list-style-type: none"> CHMP17401 Tallarook to Euroa - to be updated due to design changes; CHMP17862 Broadford to Wandong - to be updated due to design changes; and CHMP17402 Benalla. <p>The Contractor reported on the following actions undertaken to address the requirements of the CHMPs:</p> <ul style="list-style-type: none"> Conduct of compliance inspections (Condition 1). Example of compliance inspection sighted for 5 Anderson Street, Euroa, which was undertaken prior to establishment of the laydown area (15-05-25_Euroa CHMP17401). No construction-phase salvage had been undertaken at the time of the audit (Condition 2). Delivery of CHMP inductions (Condition 4). The Contractor reported that the inductions are being jointly delivered by the local RAP and the Heritage Advisor (Andrew Long Associates). Inductions are arranged by the Environmental Officer, an email to this effect was sighted during the audit. Induction records are scanned and saved in SharePoint. A sign-on sheet for a CHMP induction delivered on 12/3/2025 was sighted. A copy of CHMP 17401 was sighted at the Euroa Site Office, and a copy of CHMP17862 was sighted at the Broadford Site Office (Condition 5). During the site visit component of the audit the IEA noted that there was no CHMP copy held at the Hamilton Street / Short Street. This is raised as a finding. The Contractor stated that the site was still being established and that in the interim a copy of the CHMP was held at the Broadford Site Office. The Contractor notified the relevant RAP of commencement of works commencing under CHMP17401 and CHMP17862 on 19/12/2025 (email sighted, dated 19/12/24) (Condition 6). No storage or repatriation of Aboriginal cultural heritage material has been undertaken to date (Condition 7). Placement of topsoil, geofab, crushed rock at areas required by Condition 8 observed for the establishment of the laydown area at 5 Anderson Street, Euroa. 	May-25_EPR_AC_01 CHMP Accessibility AC01 requires the implementation of approved CHMPs. Condition 5 of the CHMP states that "during an activity, a hard copy of the approved CHMP must be retained on site, where it will be readily available to all construction staff". There was no copy of the CHMP at Hamilton Street / Short Street, noting that the site facilities at this location were not operational. This is raised as an Observation.	2-0008-110-EAP-00-RP-0031_9 CHMP 17401, dated 10/01/2025 2-0008-110-EAP-00-RP-0030_B CHMP 17862, dated 15/11/2024 19/12/24_Email CHMP 17862- Notification of Commencement.msg

Finding ID	Audit Criteria	Audit Finding	Audit Commentary	Audit Finding	Evidence
May-25_EPR_FF_01	<p>EPR FF01 Flora and Fauna Management Plan (FFMP) The Contractor must prepare and implement a Flora and Fauna Management Plan (FFMP) to protect flora and fauna from unauthorised impacts. The FFMP must be prepared in consultation with DELWP, DoT, and local Council and to the satisfaction of DELWP. The FFMP must include (without limitation):</p> <ul style="list-style-type: none"> · Roles and responsibilities · Define objectives · Development of a register and establishment of No Go Zones (NGZ), Tree Protections Zones (TPZ) and Priority Avoidance Zones (PAZ) · Identification of which threatened species habitat and threatened ecological communities are to be retained or removed and their extents · Measures to minimise injury, death, or disturbance to wildlife during Project construction activities including vegetation clearance, excavation, and trenching · Measures to manage any open pits and trenches to reduce potential fauna entrapment · Where practicable, assess suitability of cleared vegetation for reuse such as mulch and/or habitat enhancement features (e.g. ground habitat value of fallen logs) on a site-by-site basis · Installation of temporary fencing · Where large hollow bearing trees are to be removed, supplementary nesting sites/hollows will be placed at tree height and must be installed in adjacent areas prior to the removal of these trees, to provide immediate habitat for displaced fauna. The number and type of artificial hollows must be commensurate with the number and type to be removed as determined by a qualified zoologist based on available scientific knowledge. The agreed location and specification of artificial hollows must be incorporated in site maps and as a Project GIS layer prior to the commencement of works in that area. Supplementary artificial hollows are to be in place three (3) months prior to the removal of hollow bearing trees · Pre Clearance surveys must be undertaken to identify and manage fauna in hollows · Consideration of temporary hollow blocking or salvage, and relocation must be undertaken in consultation with an appropriately qualified arborist in collaboration with an on-site qualified and experienced zoologist/wildlife handler · Where habitat gaps greater than Sugar Glider and Squirrel Glider gliding thresholds will be created, glider poles must be installed prior to the removal of these trees · Where habitat gaps are created that are greater than 	Non- Conformance	<p>The IEA reviewed the current Flora and Fauna Management Plan (5-0105-112-PMA-00-PL-0046, Rev 1) and during the audit the Contractor was able to demonstrate the implementation of the majority of control measures including:</p> <ul style="list-style-type: none"> • Engaging suitably qualified and experienced personnel through subcontractor, Habitat Management Services (CV sighted for project zoologist). • Reuse of logs and branches for habitat enhancement initiatives for species including Platypus and Golden Perch. • Installation of earthen ramp within open excavation at Short Street to reduce the potential for fauna entrapment (Photo 4). • Installation of nest boxes at least 90 days prior to the vegetation removal to offset the impact on hollow-dependant fauna. Multiple nest boxes were observed including at Broadford (Photo 3). <p>The EPR requires the “development and maintenance of a Fauna Interaction Register which will include (without limitation) date, location, species, description of interaction, status and actions taken”. No such register has been developed. This has been raised as a finding.</p>	<p>May-25_EPR_FF_01 Fauna Interactions Register FF01 requires that a "Fauna Interactions Register" will be developed and maintained. There is no Fauna Interactions Register. This is raised as a Non-Conformance.</p>	<p>5-0105-112-PMA-00-PL-0046 Flora and Fauna Management Plan, Rev 01, dated 06/04/2025</p> <p>Photo 3_15/05/25_Broadford nestbox</p> <p>Photo 4_15/05/25_Excavation at Short Street</p> <p>CV Tanya White, Habitat Management Services</p> <p>20-05-25_Email, pre clearance photos.msg.</p>

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	<p>those likely to be crossed by non-gliding arboreal fauna (i.e. Phascogale) rope bridges must be installed.</p> <ul style="list-style-type: none"> · The number and type of fauna crossing structures to be installed must be determined by a qualified fauna crossing specialist based on scientific knowledge and the agreed location and specification incorporated in site maps and as a Project GIS layer prior to the commencement of works in that area · Species-specific mitigation measures to reduce likelihood of impacts on threatened species · Maintenance and monitoring requirements · Requirements for submission of data to the Victorian Biodiversity Atlas/ DELWP · Development and maintenance of a Vegetation Clearing Register which will include (without limitation) date of clearing, location, quantity, area, EVC (where relevant), species and note any reuse of vegetation · Development and maintenance of a Fauna Interaction Register which will include (without limitation) date, location, species, description of interaction, status and actions taken · Regular inspection and maintenance of fencing for th+D32e TPZs, NGZ and fauna fencing · Inductions of all contractors to identify significant ecological issues and inform them of all relevant protective measures and obligations while undertaking construction activities. Maps identifying NGZs will be provided as part of this induction · Specific measures to manage erosion, sedimentation, hazardous chemicals, and dust impacts on retained vegetation, and habitat and aquatic environments (Note: this measure is to be included in other sub-plans as is relevant) · Consultation with relevant local conservation groups as appropriate (i.e. the Regent Honey Eater Project team) · Reporting requirements. 				
May-25_EPR_GW_02	<p>Groundwater Monitoring – Benalla and Euroa</p> <p>The Contractor must engage a suitably qualified and experienced hydrogeologist to develop and implement pre-construction groundwater monitoring at Benalla and Euroa to assess the potential for regional groundwater to intersect underpass sites due to seasonal fluctuation. If the results of the pre-construction monitoring indicate the potential for regional groundwater to be intersected, the Contractor must engage a suitably qualified and experienced hydrogeologist to develop and implement dewatering management and monitoring.</p>	Opportunity for improvement	A Hydrogeological Review completed for the works at Euroa has indicated up to 15kl per day of groundwater will need to be collected and disposed of/reused (FSG 2024). During the audit the Contractor stated that there have been discussions internally, and externally with Goulburn-Murray Water (GMW), regarding dewatering and disposal options (email dated 04-04-25). The Contractor reported that the baseline groundwater monitoring and monthly monitoring were being undertaken by IRPL, however, there was no process for the sharing of monitoring data from IRPL. Without access to monitoring data, it is not clear how the Contractor will be able to adequately “assess the potential for regional groundwater to intersect underpass sites due to seasonal fluctuation” and if required, to “develop and implement dewatering	May-25_EPR_GW_02 Groundwater Monitoring The process for the Contractor accessing, analysing and utilising groundwater monitoring data collected by IRPL is not evident or clear. This is raised as an Opportunity for Improvement.	11804MAL017B Inland Rail Project-Beverage to Albury (B2A) Tranche 2-Euroa Station Precinct, Hydrogeological Review, dated 22/08/24. 04-04-25_Email, Groundwater approach

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			management and monitoring". As such, it is not clear how the Contractor will manage this risk or demonstrate compliance with this EPR. This is raised as a finding.		
May-25_EPR_NV_04	Noise Monitoring For construction scenarios which have been predicted to exceed the moderately intrusive noise management levels, noise monitoring shall be undertaken at a sample of these noise affected sensitive receivers to calibrate modelling predictions and verify on site noise levels. Noise monitoring shall be carried out in response to valid noise complaints.	Observation	The CNVMP states that noise and vibration monitoring will be undertaken in the following contexts: <ul style="list-style-type: none"> • Attended/spot noise level measurements of construction activities, where required for example for the purpose of validating models or as part of complaints management. The Contractor reported that monitoring for these purposes has not been undertaken to date for the Project. • Unattended noise logging for background/ambient noise levels as per data in Table 9, S.6.3 of the CNVMP. • Unattended noise logging for long-term construction activities (permanent installations) – the Contractor reported that several SiteHive monitors are installed across the Project with locations shown on the respective SEP. For example, SiteHive were used to monitor noise during the March rail occupation. • Attended vibration level measurements – an example of attended vibration monitoring was discussed during the audit, and a photo of a Instantel Minimates being used to measure a vibratory roller was sighted. • The Contractor noted that construction scenarios are modelled within the Construction Noise and Vibration Impact Assessment (CNVIA). The Contractor considers the CNVIA a static document, with the web-based tool SnapShot (sighted Hamilton Street- March Occupation Snapshot Report, dated 28/02/25) being used for the purposes of detailed construction planning and management and included in Activity Method Statements (AMS). • The Contractor reported that to date there had been no noise complaints requiring monitoring. However, during the audit the IEA raised questions regarding what defines or determines the validity of 	May-25_EPR_NV_04 Validity of Noise Complaints NV04 requires noise monitoring in relation to valid complaints, however the term "valid" is not defined. A definition for what comprises a valid complaint, either in the CNVMP or the Communications Plan with cross-referencing. This is raised as an Observation.	Hamilton Street- March Occupation Snapshot Report, dated 28/02/25

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			a complaint. The Contractor's management documentation does not provide any definition for a valid complaint, and this is raised as a finding.		
May-25_EPR_NV_10	Construction Traffic Where reasonable and practicable: · Unsealed haul roads shall be regularly graded. Sealed access roads and hardstand areas shall have potholes filled in a timely fashion · 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.	Observation	<p>There are Traffic Management Plans (TMPs) in place per council area and one per Department of Transport (DTP) site. During the audit the IEA interviewed the Traffic Manager. It was stated that unsealed haul roads were located at the Seymour and Tallarook sites, noting there are no activities occurring at these sites currently. These haul roads will have speed limits. Although haul roads are included in the TMPs, it was noted that the requirement of this EPR in relation to maintenance was not currently included in the TMPs, or other project documentation. This has been raised as a finding.</p> <p>Nighttime works ensure arterial roads are utilised where possible to ensure potential impact to sensitive receivers is minimised. Traffic speed limits have been established within site (10km/hr) and on active streets (down to 40km/hr). Traffic limits are communicated through the Project Induction. It is noted that there have been no speed enforcements to date.</p>	May-25_EPR_NV_10 Haul road and access road maintenance NV10 requires maintenance of haul roads and access roads. Currently maintenance requirements are not addressed in the TMP or other project documentation. This is raised as an Observation.	5-0105-112-PMA-70-PL-0002 Euroa Traffic Management Plan, Rev 0, dated 03/02/25
May-25_CEMP_01	CEMP S.5.2.2 Environmental Risk Assessment	Observation	<p>S.5.2.2 of the CEMP details the environmental risk assessment process, listing the aspects considered, including groundwater. However, during the audit it was observed that groundwater was not identified as a risk in either the environmental risk register or the Workplace Risk Assessment (WRA).</p> <p>The Contractor stated that the environmental risk register is maintained as a live document updated at least annually (refer also May-25_EPR_EMF_03). The next update is due to occur in June 2025. The Contractor stated that updates to the environmental risk register can be undertaken out of cycle due to matters such as design changes, however this has not been required to date.</p> <p>Significant risks from the environmental risk register get carried over to the Workplace Risk Register which was sighted during the audit.</p> <p>The ERA did not include any risks associated with groundwater which would seem to be a gap given the perched water at Euroa. This is raised as a finding.</p>	May-25_CEMP_01 Environmental Risk Assessment The ERA did not include groundwater related risks or opportunities. This is raised as an Observation.	5-0105-112-PES-00-RA-0001_0_B2A Environmental Risk Assessment, dated 27/06/2024. Workplace Risk Assessment (WRA)- B2A T2- Rev 0.
May-25_CEMP_02	CEMP S.5.7 Site Environment Plan	Opportunity for improvement	S.5.7 of the CEMP states that SEPs are the be “displayed, kept current and visible where relevant works are occurring”. During the site audit SEP were observed at the Broadford and Euroa site offices, however there was no SEP on display for the Hamilton Street / Short Street site, noting that the site facilities at this location were not operational. This is raised as a finding.	May-25_CEMP_02 Site Environmental Plans The SEPs were not on display for the Hamilton Street / Short Street site, noting that the site facilities at this location were not operational. This is raised	

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				as an Opportunity for Improvement.	
May-25_CEMP_03	CEMP Section 7 Documents	Observation	The Groundwater Management Procedure is currently at Revision C with a status of “issued for review”. The Contractor advised the this is an administrative error which will be rectified at the next update. This is raised as a finding.	May-25_CEMP_03 CEMP Appendix O Groundwater Management Procedure Revision The revision and status of the Groundwater Management Procedure is incorrect. This is raised as an Observation.	Groundwater Management Procedure (5-0105-112-PES-00-PR-0002), Revision C
May-25_CEMP_04	CEMP Section 7 Documents	Observation	The Surface Water Management Procedures is currently at Revision C with no document status. The Contractor advised the this is an administrative error which will be rectified at the next update. This is raised as a finding.	May-25_CEMP_04 CEMP Appendix N Surface Water Management Procedure Revision The revision and status of the Surface Water Management Procedures is incorrect. This is raised an Observation.	Obligations register
May-25_CEMP_05	CEMP S.8 Checking	Observation	<p>The Contractor provided examples of monitoring, inspections, auditing, reporting and record keeping as follows:</p> <ul style="list-style-type: none"> Monitoring of dust and noise is being undertaken by SiteHive, and vibration monitoring is being undertaken using Instantel Minimates as per Table 14, S.8.1. Photos showing installed equipment were sighted (Photo 5). Weekly Environmental Inspections are being undertaken as per Table 15, S. 8.2. An example of a completed inspection checklist was sighted (Inspections_INS-0085816_20250515_1514). The IEA noted that the responsible persons as allocated in Table 15 do not align with the roles in the Environment Team and need to be updated. This is recorded as a finding. Internal (John Holland) Audits and External Audits were discussed. An example of an Internal Audit was sighted on Soteria, specifically the pre-commencement audit which comprised a full systems audit completed 13 December 2024. The Contractor shared the audit in Soteria and was able to show that all findings raised during the pre-commencement audit had subsequently been closed. External Audits are undertaken by the IEA (this audit). The Contractor reported that IEA audit reports would be uploaded into Sharepoint. The Contractor shared a copy of the Inland Rail Monthly Report for April 2025 and stated that the 	<p>May-25_CEMP_05 Inspection - roles and responsibilities</p> <p>The roles and responsibilities listed do not reflect current roles and responsibilities. This is raised as an Observation.</p>	<p>Photo 5_30-05-25_Vibration Monitoring</p> <p>5-010501120PMA-00-RP-019- Inland Rail B2A T2 Monthly Report April 2025, Revision 0.</p> <p>Inspections_INS-0085816_20250515_1514</p>

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			<p>environmental content of the monthly report has been developed to address relevant requirements from the EMF. Specific content sighted included the two complaints received during the month, one relating to dust and one to odour. The Contractor stated that the reporting of monitoring data is done by exception, i.e. the data is not provided in the report unless there are exceedances.</p> <ul style="list-style-type: none"> Examples of record-keeping were sighted during the audit including, capturing of Internal Audit and Weekly Environmental Inspections in Soteria, compliance tracking with the Obligations Register held in Sharepoint, and environmental management plans being held and issued via Aconex 		
May-25_CEMP_06	CEMP Appendix O GWMP S.8 Inspections and Monitoring	Observation	S.8 of the GWMP details the requirements for monitoring including roles and responsibilities. However, during the audit it was identified that there were some inconsistencies and lack of clarity regarding groundwater monitoring responsibilities. Documentation such as the Obligations Register and the GWMP don't necessarily align and makes compliance unclear. This is raised as a finding. Refer also finding May-25_EPR_GW_02 and May-25_CEMP_02.	May-25_CEMP_06 Groundwater Management Procedure - Inspections and Monitoring Roles and responsibilities regarding groundwater monitoring are not clear. This is raised as an Observation.	Groundwater Management Procedure (5-0105-112-PES-00-PR-0002), Revision C Inspections_INS-0085816_20250515_1514
May-25_CEMP_07	CEMP Appendix O GWMP S.8 Inspections and Monitoring	Observation	S.8 of the GWMP details the requirements for monitoring including roles and responsibilities. However, during the audit it was identified that there were some inconsistencies and lack of clarity regarding groundwater monitoring responsibilities. Documentation such as the Obligations Register and the GWMP don't necessarily align and makes compliance unclear. This is raised as a finding. Refer also finding May-25_EPR_GW_02 and May-25_CEMP_02.	May-25_CEMP_07 Groundwater Management Procedure Inspections and Monitoring Roles and responsibilities regarding groundwater monitoring are not clear. This is raised as an Observation.	Groundwater Management Procedure (5-0105-112-PES-00-PR-0002), Revision C
May-25_FFMP_01	FFMP Section 11.3 Inspections and Monitoring	Opportunity for improvement	S.11.3 of the FFMP details environmental inspections as a management measure. However, it was observed during the site visit that the Environmental Inspection Checklist did not contain any questions related to fauna. This is raised as a finding.	May-25_FFMP_01-Auditing, Monitoring and Reporting The Environment Inspection Checklist observed did not have any questions related to fauna. This is raised as an Opportunity for Improvement.	Inspections_INS-0085816_20250515_1514
May-25_TMP_01	TrMP Section 10.7 Inspections	Opportunity for improvement	S.10.7 of TrMP details environmental inspections as a management measure. Although it was observed that TPZ's were established on site, the Environment Inspection Checklist (INS-0085816) did not have specific questions related to TPZ controls. This is raised as a finding.	May-25_TMP_01 Auditing, Monitoring and Reporting The Environment Inspection Checklist (INS-0085816) observed did not have any specific questions related to TPZ controls. This is raised as an Opportunity for Improvement.	Inspections_INS-0085816_20250515_1514

Appendix B – Photos


Item	Photo
<p>Photo 1_15-05-25_NGZ at Marchbanks</p>	 <p>The photograph shows a dense stand of trees, likely eucalyptus, with light-colored bark and green foliage. In the foreground, there is a line of red flags strung across the area, and a small sign is visible on the left. The ground is covered with dry leaves and twigs.</p>

Photo 2_15-05-25_TPZ at
Short Street



Photo 3_15-05-
25_Broadford nestbox



Photo 4_15-05-
25_Excavation at Short
Street



Photo 5_30-05-
25_Vibration Monitoring

