

16 January 2026

IRPL REF# 6-0000-210-EEC-00-LT-0116

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Dear Alexander

**CSSI 10055 Albury to Illabo (A2I) Project
Independent Environmental Audit No 2 – Audit Report Submission and Responses
to Findings.
Minister's Condition of Approval A33**

I refer to the Ministers Conditions of Approval (**MCoA's**) issued for the Critical State Significant Infrastructure (**CSSI**) Project No 10055 Albury to Illabo 1 on 8 October 2024 (**A2I Planning Approval**), and specifically the requirement to submit Independent Audit Reports and the Proponents response to the audit findings to the Planning Secretary within 2 months of undertaking the audit in accordance with MCoA A33.

The Independent Environmental Audit site inspection was undertaken on 28 and 29 October and required to be submitted by 28 December 2025. The department granted an extension for submission under MCoA A7 to the 16 January 2026 (ref: SS-10055-PA-142).

I am now pleased to be able to submit to you the second Independent Environmental Audit report for the A2I project.

Please also refer to Attachment 1 – Response to Audit Findings which outlines the proposed actions and / or current compliance status against the auditor's findings for the audit period.

If you wish to discuss any of the above further, have any comments or concerns, please either contact Rachael Labruyere, Environment Manager on rlabruyere@artc.com.au or 0419 699 761 or myself on mclark@artc.com.au or 0414 757 817.

Yours sincerely



[Malcolm Clark \(Jan 16, 2026 10:00:33 GMT+11\)](#)

Malcolm Clark
IRPL Project Director S2P/A2I

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Attachment 1 - Response to A2I IEA 2 Audit Findings

OFI Reference	Condition Reference	Context	Audit Finding Details and Recommendation	Action / Status
A2I-02_NC-01	A7	<p>Schedule 2, Part A, Condition A7. Timing and Approvals</p> <p>Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval, may be submitted or undertaken within a later timeframe agreed in writing with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident or a non-compliance.</p>	<p>A self-identified non-compliance was raised due to the failure to submit the Quarterly Monitoring Report by the extended deadline of 13 October 2025.</p> <p>RECOMMENDATION: It is recommended that all future monitoring reports and documentation be submitted by their respective due dates to ensure compliance with Condition A7.</p>	<p>The Non-Compliance was reported to DPHI and closed prior to the Audit.</p> <p>Future Quarterly Monitoring reports to be completed and submitted within the timeframes specified in the CEMP (and sub-plans) without A7 requests.</p>
A2I-02_NC-02	C7	<p>Schedule 2, Part C, Condition C7. Construction Environmental Management Plan CEMP Sub-plans</p> <p>The CEMP Sub-plans must state how:</p> <p>b) the mitigation measures identified in the documents listed in Condition A1 will be monitored and implemented;</p>	<p>The mitigation measures identified in Chapter 23 of the EIS, Waste and resource management, have not been implemented. Section 23.5.2 Mitigation measures requires that at Detailed Design/pre-construction phase, <i>a spoil management strategy would be developed to define the preferred approach to managing spoil (WM2)</i>. The Construction Waste Contamination and Hazardous Materials Management Plan Rev. 1, Section 6.1.1 Sampling, Analysis, and Quality</p>	<p>The Spoil Management Strategy was finalised and issued (to IRPL) Rev 0 on 29/10/2025.</p>

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			<p>Plan determines that site investigations will be undertaken as required to inform the detailed design and the subsequent management and classification of waste soil. The plan further states that following the development of the SAQP, site investigations will be completed across the project to ensure that potential risks to the project works as a result of contamination present at the site are mitigated, and that any excavated material would be suitably managed in accordance with the Soil and Water Management sub-plan and the spoil management strategy (mitigation measure WM2). Site investigations are underway, however a Spoil Management Strategy to determine the effective management of excavated material has not been finalised or approved for use on site.</p> <p>RECOMMENDATION: Spoil Management Strategy must be finalised immediately to ensure the effective management of excavated material.</p>	
A2I-02_NC-03	C8	<i>Schedule 2, Part C, Condition C8.</i>	A site inspection of the Albury Riverina Station paid particular	Review to be carried out of works, controls, infrastructure and signage (as required by the

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		<p>Construction Traffic, Transport and Access Management (CTTAMP) Sub-plan</p> <p>The Construction Traffic, Transport and Access Management (CTTAMP) Sub-plan must be consistent with any agreements with the relevant roads authority about the use and management of roads and include measures to:</p> <p>l) identify construction vehicle routes not identified in the documents listed in Condition A1 and in accordance with Condition E138;</p>	<p>attention to the implementation of the Precinct Traffic Management Sub-Plan – Stage B – Albury LGA Precinct General (5-0052-210-PMA-B0-PL-0001, Rev. 0 25/08/2025).</p> <p>Section 3.2.6 of the PTMP notes that Gate A4 is access only and that “Acceleration requirements are not applicable considering the entry only nature of the Gate movements”.</p> <p>However, site observations at Albury Riverina Station noted that Gate A4 is also used for egress from site directly into a 110km/hr highway on-ramp.</p> <p>There has been no risk assessment of site egress from Gate A4 in the TMP.</p> <p>RECOMMENDATION: It is recommended that site traffic cease using this gate as an egress point until such time that a risk assessment deems the action safe and that appropriate mitigation measures are put in place to ensure safe egress from site. The PTMP and CTTAMP must be updated to include these measures.</p>	<p>PTMP) for Albury Riverina Station.</p> <p>Pre-starts to include traffic management options including use of Gate 6 as an egress point</p> <p>Prior to any future use of Gate 4 a risk assessment will be carried out associated with the use of Gate 4 for egress and the associated permits to be implemented.</p>

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A2I-02_OFI-01	A8	<p>Schedule 2, Part A, Condition A8. Timing and Approvals</p> <p>Where the terms of this approval require consultation to be undertaken, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation.</p>	<p>The Consultation Report – Junee Yard Flood Design Report (Rev. 0, dated 23/09/2025) has not yet been submitted to the Department.</p> <p>RECOMMENDATION: All consultation undertaken as part of the project should be submitted to the Department to ensure transparency and compliance with Condition A8.</p>	<p>The Junee Yard Flood Design Report (Rev 0) and associated consultation report, were submitted to DPHI on 30/10/2025 and Approved 19/11/2025 (DPHI letter PA-119).</p>
A2I-02_OFI-02	C33	<p>Schedule 2, Part C, Condition C33. Construction Monitoring Programs</p> <p>The CMP(s), as approved or endorsed (as relevant), including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the planning Secretary, whichever is the greater.</p>	<p>The Environmental Work Method Statement (EWMS) – Vegetation Clearing and Grubbing was last revised on 7 March 2025, which exceeds the recommended 6-month review interval.</p> <p>RECOMMENDATION: It is recommended that EWMS should be reviewed at least every six months to ensure they remain current and reflect any changes in site conditions or requirements. Additionally, a revision table should be included in each EWMS to maintain traceability of updates.</p>	<p>The EWMS was reviewed and updated (and issued to IRPL) on the 5/11/2025. A schedule has been developed for revision of Project EWMS in line with the associated monitoring programs.</p>
A2I-02_OFI-03	E88	<p>Schedule 2, Part E, Condition E88. Consultation on Noise Barriers and Noise Mitigation</p> <p>The Proponent must prepare a consultation strategy to seek</p>	<p>The ONVR Consultation Strategy Rev. 2 has been issued for use; however, the approver's signature and approval date are missing.</p> <p>RECOMMENDATION: It is</p>	<p>The ONVR Consultation Strategy is currently a draft document which will be updated following development of the ONVR. All signatures will be included on the finalised</p>

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		<p>feedback from directly affected landowners, Council and, TfNSW (where it impacts a classified road) on proposed noise and vibration mitigation measures. The consultation strategy must be submitted to the Planning Secretary for approval one month prior to consultation commencing.</p>	<p>recommended to ensure that all controlled documents include the required approvals (signature and date) prior to issue.</p>	<p>document to be submitted to DPPI for approval. Refer to Regulatory Correspondence IR2140-RECCO-000073 detailing draft informal submission in response to DPPI comments. 'Issued for Use' will be removed from the doc control page of the draft report.</p>