

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

IEA Six-Monthly Environmental Audit Report – November 2025

29th January 2026

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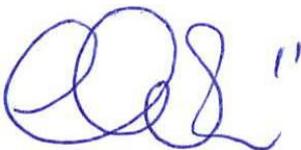
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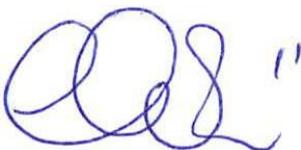
Reviewer:



Camilla Freestone

Associate Technical Director

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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 (Beveridge 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.

Version Control

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FIGURES

Figure 1 Schematic of Inland Rail Beveridge to Albury works and enhancement site (taken from EMF)7

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 second six-monthly environmental audit for Inland Rail - Beveridge to Albury Phase 1 Tranche 2 Project (B2A) (the Project), covering the period from June 2025 through to November 2025. This audit was conducted by the Independent Environmental Auditor team on 26-28 November 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:** Thirteen (13) findings were identified, comprising:
 - Eight (8) 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

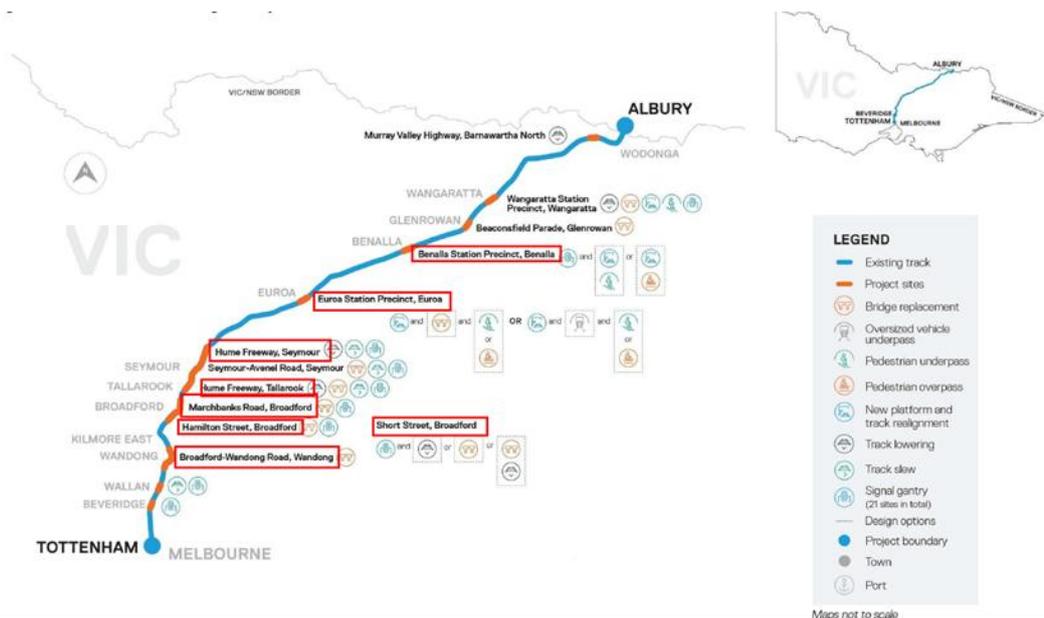


Figure 1 Schematic of Inland Rail Beveridge to Albury works and enhancement site (taken from EMF)

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	<p>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.</p>
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) • Review complaints referred by ARTC relevant to the EPRs.

Document	Extracted Requirement
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 (DCCEE) 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 second six-monthly environmental audit was conducted by the Independent Environmental Auditor team on 26-28 November 2025. This audit covered the period from June 2025 through to November 2025. Day 1 of the audit was held in the Arcadis Melbourne office, Day 2 of the audit was conducted on site, and Day 3 of the audit was held online.

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"> Sustainability, rainwater tank Air quality, dust management 	Yes
Hamilton Street, Broadford	<ul style="list-style-type: none"> Historical Heritage, low density artefact scatter Community and Stakeholder, signage 	Yes
Short Street, Broadford	<ul style="list-style-type: none"> Sustainability, Permadec design initiative Waste, C&D Air quality, dust management 	Yes
Marchbanks Road, Broadford	N/A	No
Hume Freeway, Seymour	N/A	No
Euroa Station Precinct, Euroa	<ul style="list-style-type: none"> Surface Water, stormwater and flooding Waste, office waste at site compounds 	Yes
Benalla Station Precinct, Benalla	<ul style="list-style-type: none"> Historical Heritage Waste, office waste at site compounds Air quality, dust management 	Yes
Hume Freeway, Tallarook	<ul style="list-style-type: none"> Sustainability, rainwater tank and diesel BESS Waste Contaminated Land and Spoil, stockpiling 	Yes

4.1.2 EPRs Audited

A total of 35 EPRs were audited during the November 2025 audit.

Table 5 EPRs audited

Environmental Aspect	Environmental Performance Requirement
Air Quality	<ul style="list-style-type: none"> AQ1: Air Quality Management Plan (AQMP)
Biosecurity	<ul style="list-style-type: none"> BI1: Biosecurity Management Plan (BMP) BI2: Cleared vegetation BI3: Clean fill

Environmental Aspect	Environmental Performance Requirement
Community and Stakeholder	<ul style="list-style-type: none"> • CS1: Community and Stakeholder Management Plan (CSMP) • CS2: Minimise Disturbance to Residences – Direct acquisition and temporary occupation • CS3: Complaints Management Process • CS5: Notification and Community Engagement - Noise and Vibration
Contaminated Land and Spoil	<ul style="list-style-type: none"> • CL1: Contaminated Land and Spoil Management Plan (CLSMP)
Historical Heritage	<ul style="list-style-type: none"> • HH1: Archaeological Management Plans (ArchMP) • HH3: Heritage Consents and Heritage Overlay • HH4: Unidentified Finds Procedure • HH5: Training • HH7: Minimise Impacts • HH9: Heritage Interpretation Strategy
Landscape	<ul style="list-style-type: none"> • LV1: Urban Design • LV2: Landscape Management Plan (LMP) • LV3: Temporary Occupation
Reinstatement and Rehabilitation	<ul style="list-style-type: none"> • RR1: Reinstatement and Rehabilitation Plan (RRP) • RR2: Reinstatement and Rehabilitation Plan (RRP)
Community and Stakeholder	<ul style="list-style-type: none"> • SO1: Social Delivery Plan (SDP)
Surface Water	<ul style="list-style-type: none"> • SW1: Water Sensitive Urban Design (WSUD) • SW2: Water Discharge • SW3: Surface Water Management Procedures (SWMPs) • SW4: Temporary occupation –Flooding
Sustainability	<ul style="list-style-type: none"> • SU1: Infrastructure Sustainability Rating - Excellent • SU2: Sustainability Management Plan (SuMP) • SU3: Minimise greenhouse gas emissions • SU4: Minimise and appropriately manage waste • SU5: Minimise potable water consumption • SU6: National Greenhouse and Energy Reporting (NGER) • SU7: National Pollutant Inventory (NPI)
Traffic	<ul style="list-style-type: none"> • T1: Traffic Management Plan (TMP) • T2: Disruption of Roads and Sharepaths
Waste	<ul style="list-style-type: none"> • W1: Waste Management Plan (WMP)

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 6 below.

Table 6 EPRs classified as "not applicable".

Requirement	Commentary
EPR CS4: Property Acquisition - Support to Residents	Property acquisition is the responsibility of Inland Rail
EPR CL2: Wangaratta Station Precinct	JH is not delivering any scope of works within the Wangaratta Station Precinct
EPR HH2: Heritage Permits	JH will comply with all heritage permit requirements for works within the extent of relevant Victorian Heritage Register Places, however JH is not delivering any works within the Glenrowan Heritage Precinct (H2000) or the Wangaratta Railway Station Complex (H1597)
EPR HH6: Landscaping and Reestablishment of Trees	No landscaping anticipated within VHR overlays.
EPR HH8: New Development	JH and its design partners will ensure new development is response to relevant heritage places for Tranche 2 sites, however JH is not undertaking works within the Glenrowan Heritage Precinct.

4.1.3 Documentation Audited

A total of ten (10) management plans were audited during the November 2025 audit.

Table 7 Documentation audited

Environmental Aspect	Document Number	Document	Revision
Air Quality	5-0105-112-PMA-00-PL-0043	Air Quality Management Plan	00
Biosecurity	5-0105-112-PMA-00-PL-0042	Biosecurity Management Plan	00
Community and Stakeholder	5-0105-112-PMA-00-PL-0059	Community and Stakeholder Management Plan	01
Contaminated Land	5-0105-112-PMA-00-PL-0045	Contaminated Land and Spoil Management Plan	00
Landscape	5-0105-112-PMA-00-PL-0041	Landscape Management Plan	00
Waste	5-0105-112-PMA-00-PL-0049	Waste Management Plan	00
CEMP (Surface Water)	5-0105-112-PMA-00-PL-0068	Surface Water Management Procedures (Appendix N to the CEMP)	01
Sustainability	5-0105-112-PMA-00-PL-0052	Sustainability Management Plan	01

Reinstatement and Rehabilitation	5-0105-112-PMA-00-PL-0050	Reinstatement and Rehabilitation Plan	00
Historical Heritage	5-0105-112-PMA-00-PL-0047	Heritage (Archaeological Management Plan)	00

5 Audit Findings

5.1 Contractor Performance

During the audit conformance was demonstrated for 154 (92%) 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. This includes fencing off a low-density artefact scatter which was sighted at Hamilton Street, Broadford during the site audit, and redesign of utilities assets to avoid the scatter. In addition, sustainability initiatives were sighted at site compounds which exceed environmental conformance. This includes the diesel BESS observed at Tallarook and rainwater tanks observed at Wandong and Tallarook. The Contractor maintained a high level of general site establishment.

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 35 EPRs audited, 28 were found compliant, and seven (7) had findings raised against them.

Table 8 Open audit findings raised from this audit

Finding classification	Open Findings from this audit
Non-conformance	0
Opportunity for Improvement	8
Observation	5
Total	13

5.3 Overall Audit Findings

Table 9 Overall audit findings raised from this audit and previous audits

Finding classification	Findings raised from November 2025 audit	Findings closed during November 2025 audit	Findings remaining open from previous audits
Non-conformance	0	1	0
Opportunity for Improvement	8	5	0
Observation	5	9	1
Total	13	15	16

5.4 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 Category	Audit Commentary	Audit Finding	Evidence
EPR Findings					
Nov-25_EPR_BI_03	<p>BI3 Clean fill</p> <p>The Contractor must use imported fill only when it is certified weed, seed, pathogen and contaminant free. Imported fill must be classified in accordance with the EPA Publication 1968.1: Guide to classifying industrial waste. Documentation of certified clean fill is to be included as part of the auditing process and available to the Councils, upon request, up to four (4) years after the works. This allows tracking of the germination of new and emerging weeds in the district.</p>	Opportunity for improvement	<p>The Biosecurity Management Plan refers on to the Imported Materials Management Guideline for the process of importing clean fill. The contractor provided various examples of fill material being imported to site including import of Type B fill material from the North East Link Project. Correspondence between a Project Engineer and the Project Environment Manager was sighted, and the associated Waste Designation.</p> <p>The spoil tracking register was also sighted which tracks all imported material.</p> <p>S.8.2.1 of the Biosecurity Management Plan states “Where clean fill soil has been imported this will be documented and available to Councils upon request for up to 4 years after the Project”. Whilst this statement aligns with the EPR it is not clear how this will be achieved. Furthermore the EPR also refers to an “auditing process” which is not defined or described.</p>	<p>The EPR states that “Documentation of certified clean fill is to be included as part of the auditing process and available to the Councils, upon request, up to four (4) years after the works.” The definition of <i>auditing</i> in this context needs to be either clarified with the client or defined by the contractor so that the obligation is clear. Furthermore, the process for provision of information post-construction is not adequately defined within project documentation. This is raised as an Opportunity for Improvement.</p>	<p>Imported Materials Management Guideline (Department of Economic Development, Jobs, Transport and Resources 2016)</p> <p>Email 5 September 2025, “FW: EPH – NEL Manningham Ramp Spoil”</p> <p>EPA Waste Designation WD000300503</p> <p>B2A Spoil Tracker.xlsx</p> <p>5-0105-112-PMA-00-PL-0042 Biosecurity Security Management Plan, Rev 0, dated 25/02/2025</p>
Nov-25_EPR_CL_01	<p>CL1 Contaminated Land and Spoil Management Plan (CLSMP)</p> <p>The Contractor must prepare and implement a Contaminated Land and Spoil Management Plan (CLSMP) to outline measures to ensure appropriate management of contaminated soil to prevent potential impacts to the environment. The CLSMP must be prepared, in consultation with ARTC, the EPA Victoria, DoT, local Council, any relevant public land managers and, in respect of transport of spoil, the relevant road authorities.</p> <p>The CLSMP must include (without limitation):</p> <ul style="list-style-type: none"> ▫ Roles and responsibilities ▫ Methods and procedures to manage temporary and permanent spoil stockpiles and comply with applicable regulatory requirements ▫ Results of detailed site assessments identifying location, types and extent of any contamination, prescribed industrial waste (PIW) and other waste ▫ Utilise results of the site assessments to identify the nature and extent of spoil (clean fill and contaminated spoil) ▫ Identify the capacity for contaminated spoil material to be treated and/or disposed 	Observation	<p>The Contaminated Land and Spoil Management Plan (CLSMP) is at Rev 0 and was last updated 17/12/2024. The Contractor noted that this was due for their annual review. The CLSMP has been developed to address the requirements of the EPR including:</p> <p>Roles and Responsibilities Table 1, S.2.2.</p> <p>Stockpile Management Table 15, S.9.1.1.</p> <p>Results of Detailed Site Assessments Detailed site assessments were undertaken for the Project, the details of which are summarised in Table 4 and S.5.1 of the CLSMP. The CLSMP notes that the long-term use of the project areas for rail purposes and therefore Rail Contaminants of Potential Concerns (COPCs).</p> <p>Storage, Handling, Transport and Disposal of Spoil S.10-S.13 of the CLSMP include address this requirement. An A16 permit for the supply or use of reportable priority waste was sighted. An example of importing of material, and a waste designation, was included in finding Nov-25_EPR_BI_03. However, it was noted that S.8 of the CLSMP requires updating regarding details of waste designations.</p> <p>The spoil tracking register was sighted, which tracks all imported material and includes details on the material type, source and destination, and quantity. Data was observed relating to:</p>	<p>S.8.2 of the CLSMP does not capture any new or recent designations. This is raised as an Observation.</p>	<p>5-0105-112-PMA-00-PL-0045_0 Contaminated Land and Spoil Management Plan, Rev 0, dated 17/12/2024.</p> <p>EPA A16 Permit for the supply or use of reportable priority waste P00300403</p> <p>Email 5 September 2025, “FW: EPH – NEL Manningham Ramp Spoil”.</p> <p>EPA Waste Designation WD000300503</p> <p>B2A Spoil Tracker.xlsx</p>

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	<ul style="list-style-type: none"> Storage, handling, transport and disposal of spoil in a manner that protects human health and the environment and is compliant with all regulations this includes requirements and methods for the appropriate treatment/remediation of any contaminated excavated spoil and contaminated residual material Design and management of temporary stockpile areas Reporting requirements. 		<ul style="list-style-type: none"> Tracking of Cat D material from Anderson Street to offsite disposal, and Movement of material between Project sites from Euroa to Wandong. <p>Various controls were observed on site including, trucks with covered loads, water trucks used for wetting down material and limit dust production, and use of rumble grids to control off-site movement of material.</p>		
Nov-25_EPR_CS_01	<p>CS1 Community and Stakeholder Management Plan (CSMP)</p> <p>The Contractor must prepare and implement a Community and Stakeholder Management Plan (CSMP), in consultation with ARTC and local Council, that includes the following (without limitation):</p> <ul style="list-style-type: none"> Addresses all Project activities that potentially impact on community and business operations and provide for a well-coordinated communication and engagement process Sets out processes and measures to provide advance notice to key stakeholders and other potentially affected stakeholders of construction activities (including any staged works, early works, main works, or out of hours works), significant milestones, changed traffic conditions, interruptions to utility services, changed access and parking conditions, periods of predicted high noise and vibration activities, any potential impacts to environmental values and including contact details for enquiries/complaints Provides for any interested stakeholder to register their contact details to the Project webpage to ensure they are automatically advised of planned construction activities, Project progress, mitigation measures and intended reinstatement measures where applicable Respite and Relocation Management Plan (where required) to manage those residents and businesses directly impacted by noise and vibration (day and night works). 	Opportunity for improvement	<p>The Communications and Stakeholder Management Plan (CSMP) is at Rev 1 and was last updated 22/10/2025.</p> <p>The Contractor provided the following evidence to demonstrate implementation of the CSMP:</p> <ul style="list-style-type: none"> The Contractor stated that community notifications are provided to residents and businesses to give notice of upcoming works. A community notification for works at Short Street was sighted. This notification included the scope and timing of work, information on noise plant and equipment, proposed impact management, and contact details. Snapshot mapping for the Short Street soil nail wall was sighted. This tool is used for assessing potential noise impacts by considering construction equipment location, noise levels and vicinity of residents. Outputs from Snapshot are used to identify which residents should offered respite and relocation. Relocation specialists are used to support implementation of the Respite and Relocation Plan, including logging residents on the B2A Relocation Spreadsheet and booking accommodation. A relocation offer letter for Broadford was sighted. Examples of providing support to local businesses include, (1) relocation of a coffee van to one of the Project site offices so that they could continue to operate. Noting that IRPL are managing the long-term impacts to this particular business, and (2) using Broadford Kebab Station for workforce catering. <p>Although the Contractor could demonstrate businesses were being managed as a result of anticipated impacts related to noise and vibration, "The Respite and Relocation Management Plan" does not address businesses.</p>	<p>The EPR requires that the "Respite and Relocation Management Plan (where required) to manage those residents and businesses directly impacted by noise and vibration (day and night works)." The Respite and Relocation Management Plan does not address businesses. This is raised as an Opportunity for Improvement.</p>	<p>5-0105-112-PMA-00-PL-0059 Community and Stakeholder Management Plan, Rev 1 dated 22/10/2025.</p> <p>5-0105-112-PMA-00-PL-0079 Respite and Relocation Management Sub-Plan, Rev 0 dated 8/10/2024.</p> <p>Inland Rail B2A – Short St, Broadford – Short St Soil Nail Wall – Snapshot output.</p> <p>Important Notice – Offer of Relocation – 24/7 works at Broadford.</p> <p>"B2A Relocation spreadsheet"</p> <p>Email 30 May 2025 to Broadford Kebab Station, "Catering for John Holland team".</p>
Nov-25_EPR_CS_03	<p>CS3 Complaints Management Process</p> <p>The Contractor must prepare and implement a complaints management process. The complaints management process must be prepared in accordance with AS/NZS 10002:2014 Guidelines for Complaint Management in Organisations, Inland Rail Specification</p>	Opportunity for improvement	<p>The Contractor reported that a system called "Consultation Manager" has been set-up by IRPL to track and manage complaints, and that they have full access to this system.</p> <p>The Contractor talked through a recent complaint where a resident had complained of noisy truck movements on Sutherland Street, Broadford resulting from night works. As a</p>	<p>The EPR requires that "Any complaints relevant to these EPRs will be referred to the Independent Environmental Auditor." Project documentation and processes do not address this</p>	<p>Consultation Manager entry 18284.</p>

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	– Complaints Management Requirements (0-0000-900-PCS-00-SP-0001) and Inland Rail Complaints Management Handling Procedure (0-0000-900-PCS-00-PR-0002). Any complaints relevant to these EPRs will be referred to the Independent Environmental Auditor.		result, the Senior Stakeholder Engagement Advisor dropped off noise cancelling headphones which resolved the issue. The logging and resolving of this complaint was sighted in “Consultation Manager”. Although the Contractor could demonstrate that EPR related impacts were being managed, this EPR calls for “Any complaints relevant to these EPRs will be referred to the Independent Environmental Auditor”, this could not be evidenced with no documentation or processes in place to implement this requirement.	requirement. This is raised as an Opportunity for Improvement.	
Nov-25_EPR_SU_03	<p>SU3 Minimise greenhouse gas emissions</p> <p>Integrate sustainable design practices which are best practice for rail infrastructure projects into the design process and implement these to minimise, to the extent practicable, greenhouse gas emissions arising from the construction of the B2A Project.</p> <p>Requirements from the planning approvals will be extracted and communicated to the design teams. The Inland Rail Greenhouse Assessment Tool will be used to model the energy footprint of the base design and actual case. The Contractor is required to set greenhouse gas emissions reduction targets, in consultation with ARTC, DELWP and EPA Victoria.</p>	Opportunity for improvement	<p>The Sustainability Management Plan (SuMP) is at Rev 1 and was last updated 23/05/2025. The project sustainability targets including targets to manage energy and carbon are detailed in Table 5 S.4.2 of the SuMP.</p> <p>During the audit, the IEA sighted the Management Plan Consultation Tracker which confirms that the SuMP has been reviewed by IRPL and local councils. Additional Aconex correspondence confirming endorsement of the Sustainability Management Plan by IRPL was also sighted by the IEA. The IEA did not sight evidence demonstrating that DELWP or the EPA had been consulted in setting greenhouse gas emissions reduction targets.</p>	The EPR requires that the Contractor “set greenhouse gas emissions reduction targets, in consultation with ARTC, DELWP and EPA Victoria.” Project documentation did not show that DELWP or the EPA had been consulted. This is raised as an Opportunity for Improvement.	<p>5-0105-112-PMA-00-PL-0052 Sustainability Management Plan, Rev 01, dated 23/05/2025</p> <p>Management Plan Consultation Tracker, November 2025</p> <p>IRPL correspondence in Aconex transmittal chain JH-TRANSMIT-000021</p>
Nov-25_EPR_SU_07	<p>SU7 National Pollutant Inventory (NPI)</p> <p>□ The Contractor shall prepare, record, report on and retain information related to the Contractor’s Activities and the Works in order to report under the relevant Act in respect of D&C Contractor’s Activities and the Works</p> <p>□ The Contractor shall provide all documents and other information which are necessary to enable ARTC to comply with any obligations it may have under the relevant Act in respect of the NPI, or which ARTC (acting reasonably) may request in connection with the NPI</p>	Opportunity for improvement	During the audit, the IEA interviewed the Sustainability Manager. It was stated that the Project does not have NPI reporting requirements as it does not exceed the NPI threshold. However, no documentation was available to demonstrate that the project does not exceed the NPI threshold.	Project documentation does not demonstrate that EPR SU7 does not apply. This has been raised as an Opportunity for Improvement.	
Nov-25_EPR_SW_03	<p>SW3 Surface Water Management Procedures (SWMPs)</p> <p>The Contractor, in consultation with ARTC and, local Council, must prepare and implement Surface Water Management Procedures (SWMPs). The SWMPs must be in accordance with all relevant conditions of approval, EPA Victoria Publication 275 Construction techniques for sediment pollution control, EPA Victoria Publication 1834 Civil construction, building and demolition guide and EPA Victoria Industrial Waste Resource Guidelines 701 Sampling and analysis of waters, wastewaters, soils</p>	Observation	<p>The Surface Water Management Procedures (SWMPs) are attached as Appendix N to the Construction Environmental Management Plan (CEMP). The CEMP is at Rev 1 and was last updated 13/11/2025.</p> <p>Reference Documents and Updates</p> <p>Since the previous audit, minor updates to the SWMPs include:</p> <ul style="list-style-type: none"> • Updates to Table 32: Closest sensitive receptors (waterways) for each project site. 	<p>Incorrect stakeholder reference in Appendix N: Surface Water Management Procedures due to an organisational restructure, “IRPL” is now the correct stakeholder name, not ARTC. This has been raised as an Observation.</p>	<p>5-0105-112-PMA-00-PL-0068 Construction Environmental Management Plan, Rev 01, dated 13/11/2025</p> <p>Eldarin B2A Waste Summary, dated 26/11/2025</p>

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	<p>and wastes and EPA Victoria Environmental Reference Standard – Surface Waters.</p> <p>The SWMPs must include (without limitation):</p> <ul style="list-style-type: none"> ▣ Roles and responsibilities ▣ Objectives ▣ Monitoring requirements ▣ Sediment and erosion control ▣ Requirements and methods for minimising, handling, classifying, treating, disposing and otherwise managing wastewater ▣ Measures to maintain the key hydrologic and hydraulic functionality and reliability of existing flow paths, drainage lines and floodplain storage ▣ Measures to retain existing flow characteristics to maintain waterway stability downstream of construction ▣ Measures to protect surface water habitats (e.g. dams, creeks, wetlands) ▣ Location and bunding of any contaminated material (including tunnel spoil and stockpiled soil) to the 1% AEP flood level and to the requirements of the relevant drainage authority ▣ Details of Project scheduling to reduce flood related risks ▣ Measures to protect against and minimise the risk of contaminated discharge to waterways ▣ Documentation of the existing condition of all drainage assets potentially affected by the Project construction activities and works (including their immediate surrounds) to enable baseline conditions to be established and potential construction impacts on these assets to be assessed and managed. ▣ Requirements to consult with the relevant catchment management authority about potential flooding of Sunday Creek and Dry Creek. 		<ul style="list-style-type: none"> • Removal of reference to the North East Catchment Management Authority, as it is not relevant to the project's location. • Updates to document control details. <p>Stakeholder Consultation</p> <p>The contractor provided evidence that ARTC and the local Council were consulted during the preparation of the SWMPs (sighted Acconex Transmittal). Due to organisational restructuring, "IRPL" is now the correct stakeholder name, not ARTC.</p> <p>Compliance with Regulatory Guidance</p> <p>The SWMPs have been prepared in accordance with:</p> <ul style="list-style-type: none"> • All relevant conditions of approval • EPA Victoria Publication 275: Construction Techniques for Sediment Pollution Control • EPA Victoria Publication 1834: Civil Construction, Building and Demolition Guide • EPA Victoria Industrial Waste Resource Guidelines 701: Sampling and Analysis of Waters, Wastewaters, Soils and Wastes • EPA Victoria Environmental Reference Standard – Surface Waters <p>Site Controls and Activities</p> <p>S.6.1 of the SWMP states that construction activities will not require significant discharge of wastewater or runoff to water environments, as appropriate controls will be in place to prevent uncontrolled releases from dewatering or other wastewater activities. This is supported by the absence of non-conformances or incidents recorded in John Holland's Soteira System.</p> <p>Upcoming and Ongoing Works</p> <p>Piling is scheduled to commence soon at Euroa. Onsite storage (4,000L bladder or additional tanks) will be provided. If water meets discharge quality requirements and large volumes are received, the contractor may pump to the creek.</p> <p>Wastewater transported offsite is managed using licensed NDD trucks, with the majority being taken to a licensed</p>		

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
			facility in Nagambie. The IEA reviewed the "Eldarin B2A Waste Summary" which documents all wastewater disposed of at licensed facilities, providing a clear record of compliance		
Management Plan Findings					
Nov-25_CEMP_01	<p>Construction Environmental Management Plan - Section 5.7.2</p> <p>The Site Environment Plans (SEPs) provide a summary of the site level content of the CEMP and sub-plans that is specific to a precinct (or other locations as needed) and identify specific measures included in the relevant construction methodology to prevent adverse environmental impacts and enable environmental opportunities. The SEPs will include plans at an appropriate scale which show, where relevant:</p> <ul style="list-style-type: none"> • Location and scope of works to be managed • Location and nature of key site features such as significant structures, sensitive receivers and protected trees near the work site • Location and nature of physical controls or the nature of management controls required by the plan • Nature and frequency of monitoring to be undertaken of environmental indicators • Procedures for notification of any incident or potential hazard, including emergency contacts. • Spill kit locations • Sensitive stakeholders • Heritage areas including non-Aboriginal heritage sites • Vegetation that requires protection • Re-fuelling points • Wash down bays • Environmentally sensitive areas on or near a project site • Locations of environmental controls • Buffer zones or 'no-go zones' • Priority Avoidance Zones • Monitoring locations. 	Observation	The presence of SEPs was noted at multiple site offices and compounds. The SEP generally displayed the information in accordance with the CEMP including showing monitoring locations, environmental controls, vegetation to be protected, and heritage sites. However, during the site visit to the Hamilton Street compound it was observed that the sensitive receivers were not shown on the SEP.	Sensitive receivers were not shown on the SEP at the Hamilton Street compound. This is raised as an Observation.	Photo 1_27-11-25_Hamilton St SEP

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
Nov-25_AQMP_01	<p>AQMP</p> <p>Control Measures</p> <ul style="list-style-type: none"> • Trigger Action Response Protocol (TARP) 	<p>Opportunity for improvement</p>	<p>The Air Quality Management Plan (AQMP) is at Rev 0 and was last updated 26/11/2024.</p> <p>The trigger values outlined in S.8.1 of the AQMP are intended to compliment real-time visual assessments. They provide an early indication of the potential to exceed objectives established in the ERS (Table 5). The SiteHive monitoring platform will use an email/SMS notification system to provide live updates and trigger alerts of exceedances. If a trigger level is reached, an alert will be sent to the nominated responsible person to ensure appropriate action is undertaken. The IEA observed that no SiteHive devices monitoring ambient air were not set up to monitor the Trigger Action Response Protocol (TARP). As a result, any potential exceedances in the future of the ERS air quality objectives may be missed.</p> <p>Air quality and lighting control measures relevant to onsite controls were observed in the Site Environment Plans and on site, these included:</p> <ul style="list-style-type: none"> • Light towers associated with the V/Line occupation • Water carts in use at Short Street and Wandong sites 	<p>SiteHive devices monitoring ambient air were not set up to monitor the Trigger Action Response Protocol (TARP) from S.8.1 of the Air Quality Management Plan (Rev 0, issued 26/11/24), therefore the action levels are not applied. This has been raised as an Opportunity for Improvement.</p>	<p>5-0105-112-PMA-00-PL-0043 Air Quality Management Plan, Rev 00, dated 26/11/2024</p>
Nov-25_AQMP_02	<p>AQMP</p> <p>Monitoring and Reporting</p> <ul style="list-style-type: none"> • Inspections and audits o Independent Auditing • Monitoring • Reporting • Non-conformance, incident reporting and investigations 	<p>Opportunity for improvement</p>	<p>The Environment and Sustainability Inspection which is held in the John Holland system Soteria and is undertaken weekly, was observed to have air quality and lighting related questions. Internal audits and external audits undertaken within the audit period also included similar questions.</p> <p>There is monitoring of RCS, PM2.5 and PM10 currently being undertaken. RCS (silica testing) is managed by the safety team. PM2.5 and PM10 is monitored by onsite SiteHive. In the audit it was observed that not all SiteHive devices had the Environment Reference Standard (ERS) air quality criteria from Table 5 applied in the back end, therefore are not applied to the nearest identified sensitive receiver.</p> <p>Reporting is undertaken in accordance with the Project CEMP.</p> <p>There have been no non-conformances, incidents and or investigations within the audit period that relate to air quality or lighting.</p>	<p>SiteHive devices monitoring ambient air were not set up to monitor the Environment Reference Standard (ERS) air quality criteria from Table 5 of the Air Quality Management Plan (Rev 0, issued 26/11/24) therefore the criteria is not applied to the nearest identified sensitive receiver. This has been raised as an Opportunity for Improvement.</p>	<p>5-0105-112-PMA-00-PL-0043 Air Quality Management Plan, Rev 00, dated 26/11/2024</p> <p>Inspections_INS-0112326_20250718_Benalla</p> <p>Inspections_INS-0112294_20251114_Benalla</p>
Nov-25_SuMP_01	<p>Sustainability Management Approach</p> <ul style="list-style-type: none"> • Overview • Embedding Sustainability • Sustainability in Design • Sustainability in Procurement • Sustainability in Construction 	<p>Observation</p>	<p>During the audit, the IEA interviewed the Sustainability Manager. It was stated that the Workplace Risk Assessment (WRA) is the central risk register for risks on the project, including sustainability risks. The WRA is reviewed monthly. The WRA is not documented in S6.6 of the SMP. The IEA also sighted the monthly reporting document that the project uses to provide updates to IRPL on the status of sustainability risks and opportunities.</p>	<p>The Sustainability Management Plan (Rev 1, issued 23/05/2025) does not describe important aspects of the sustainability risk management process on the Project including the Workplace Risk Assessment.</p>	<p>5-0105-112-PMA-00-PL-0052 Sustainability Management Plan, Rev 01, dated 23/05/2025</p> <p>Workplace Risk Assessment (WRA) – B2A T2</p> <p>Sustainability Monthly Reporting, October 2025</p>

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	<ul style="list-style-type: none"> • Sustainability risks and opportunities • Innovation • Climate change risk assessment 				
Nov-25_SWMP_01	<p>Surface Water Management Procedures</p>	<p>Opportunity for improvement</p>	<p>The Surface Water Management Procedures (SWMPs) are attached as Appendix N to the Construction Environmental Management Plan (CEMP). The CEMP is at Rev 1 and was last updated 13/11/2025. The IEA reviewed S.3 of the SWMPs.</p> <p>PSR Clauses</p> <p>Table 30: Relevant PSR Clauses to this Procedure was audited to assess whether the contractor could provide evidence of compliance. One clause could not be evidenced:</p> <p>“The Contractor’s activities must comply with the International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control document.”</p> <p>Traceability for this Project Scope Requirement could not be demonstrated during the audit.</p> <p>However, onsite observations confirmed that appropriate sedimentation controls were in place, and there were no non-conformances or incidents recorded in John Holland’s Soteira System.</p> <p>Environmental Management Framework</p> <p>S.3.2: Environmental Management Framework details EPRs SW2, SW3, and SW4. The contractor advised that SW1 is not included in the SWMP, as it is a design requirement allocated by the environment team to relevant packages, as described in S.5.5.1 Environmental Integration in Design, CEMP (Revision 1, 13/11/2025).</p>	<p>Traceability of Project Scope Requirements is inadequately described and integrated into the implementation of this Plan. This has been raised as an Opportunity for Improvement.</p>	<p>5-0105-112-PMA-00-PL-0068 Construction Environmental Management Plan, Rev 01, dated 13/11/2025</p>
Nov-25_WMP_01	<p>Waste Management Plan - Section 7.3</p> <p>In accordance with the waste management hierarchy, when avoiding or reducing waste is not possible, waste is to be reused on site or off site for the same or a similar use. It may also be recovered through recycling and reprocessing, so that waste can be processed into a similar non-waste product.</p> <ul style="list-style-type: none"> ➢ Waste separation and segregation will be promoted on site to facilitate reuse and recycling as a priority of the waste management program as follows: ➢ Waste segregation on site (construction activities) – waste materials, including spoil and demolition waste, 	<p>Observation</p>	<p>The Waste Management Plan (WMP) is at Rev 0 and was last updated 17/12/2024.</p> <p>The WMP has been developed to address the requirements of the EPR including:</p> <p>Waste Separation and Segregation is addressed in S.7 of the WMP which includes details on avoidance and reduction, reusing and recycling, classification, handling and storage, treatment and disposal, transportation, diversion, tracking and reporting, salvage, and construction management of waste streams.</p> <p>Evidence sighted during the audit which demonstrates implementation of the WMP includes:</p>	<p>Non-recyclable waste was observed in the recycling bin at the Benalla site office, and construction waste was observed to be incorrectly sorted at the Short Street compound. These are raised as an Observation.</p>	<p>5-0105-112-PMA-00-PL-0049, Waste Management Plan, Rev 0, dated 17/12/2024</p> <p>Audit Checklist Waste Management Facilities – Future Metals, Shepparton</p> <p>Master B2A T2 Waste Tracker _Offices & Sites</p> <p>Photo 2_27-11-25_Benalla Office Waste</p> <p>Photo 3_27-11-25_Short Street C&D Waste</p>

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	<p>will be separated on site into dedicated bins / areas for either reuse on site or collection by a waste contractor and transport to offsite facilities</p> <ul style="list-style-type: none"> ➤ Waste segregation on site (office) – waste within site offices shall be segregated on site with colour coded bins being provided for mixed recyclable, organic waste, landfill and paper. Paper bins will be provided throughout the office to encourage the recycling of scrap paper ➤ Waste separation off site at an appropriately licenced facility – wastes to be deposited into one bin where space is not available for placement of multiple bins, and the waste is to be sorted off site by a waste contractor ➤ Where reasonable and practicable, transfer kerb and pavement materials (concrete and asphalt) to crushing and recycling plants. 		<ul style="list-style-type: none"> • Completion of destination audits to check that the sites receiving waste from the Project area operating in a compliant manner. • Use of a waste tracker to record movement of waste from offices and site, data on construction waste and office waste was observed. <p>During the site visit to the Benalla site office and the Short Street compound instances of incorrect waste segregation were observed.</p>		

Inland Rail Beveridge to Albury – Six-Monthly Environmental Audit Report

Appendix B – Previous Audit Findings



Finding ID	Audit Criteria	Audit Category	Audit Finding	Current Status	Status (Open/ Closed)
May-25_EPR_EMF_03	<p>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.</p>	Opportunity for improvement	<p>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.</p>	<p>Nov-25: The IEA sighted an updated version of the Environmental Risk Assessment (Revision 1, 15/07/2025). The update was informed by a session undertaken with the Design and Engineering Manager and the Environment Team in March 2025. The updates included more design related risks in relation to upcoming planned works at Euroa associated with the decline structure and piling works. The audit finding can be closed as the risk assessment has design representation and further risks have been captured.</p>	Closed
May-25_EPR_EMF_04	<p>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 the significant ecological or heritage values protected by the NGZ.</p>	Observation	<p>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.</p>	<p>Nov-25: The IEA sighted a working document of the Flora and Fauna Management Plan (5-0105-112-PMA-00-PL-0046 Revision 2, to be issued in May 2026). Updates to the plan were captured in track changes. Updates sighted by the IEA include S.8.3.3.1 detailing any decisions made on site that affect vegetation management that compete with EPR EMF04, including justification for any deviation from the approved approach of the Environmental Representative or Environment Manager. The audit findings can be closed once Revision 2 of the Flora and Fauna Management Plan is issued and Clearing Permit has been updated to include "justification for deviation".</p>	Open
May-25_EPR_AC_01	<p>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>.</p>	Observation	<p>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.</p>	<p>Nov-25: During the site audit, the IEA sighted CHMPs at all visited site offices which were:</p> <ul style="list-style-type: none"> • CHMP17401 Tallarook to Euroa; • CHMP17862 Broadford to Wandong - recently updated due to design changes; and • CHMP17402 Benalla 	Closed
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</p>	Non-Conformance	<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</p>	<p>Nov-25: The IEA sighted the B2A Fauna Register managed by the Contractor. The Contractor advised that an additional fauna register for the Project is managed by Habitat Management Services. The audit finding can be closed as there are two fauna interactions registers for the project.</p>	Closed

Finding ID	Audit Criteria	Audit Category	Audit Finding	Current Status	Status (Open/ Closed)
	<p>satisfaction of DELWP.</p> <p>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 those likely to be crossed by non-gliding arboreal fauna (i.e. Phascogale) rope bridges must be installed. · 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 		<p>Interactions Register. This is raised as a Non-Conformance.</p>		

Finding ID	Audit Criteria	Audit Category	Audit Finding	Current Status	Status (Open/ Closed)
	<p>impacts on threatened species</p> <ul style="list-style-type: none"> · 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 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	<p>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.</p>	<p>Nov-25: John Holland confirmed with IRPL that seasonal variation (levels) in relation to EPR GW02 was captured and subsequently provided to John Holland (sited Teams correspondence on 30-Sept-25). The IEA cited the Groundwater Management Procedures, a part of the updated Construction Environmental Management Plan (5-0105-112-PMA-00-PL-0068 Revision 01, 13/11/2025) which details the information that has been provided to the contractor.</p>	Closed
May-25_EPR_NV_04	<p>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.</p>	Observation	<p>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.</p>	<p>Nov-25: The IEA sighted S7.2 of the updated CNVMP (5-0105-112-MPA-00-PL-0048 Revision 1) which defines a valid complaint. The audit finding can be closed.</p>	Closed

Finding ID	Audit Criteria	Audit Category	Audit Finding	Current Status	Status (Open/ Closed)
May-25_EPR_NV_10	<p>Construction Traffic Where reasonable and practicable:</p> <ul style="list-style-type: none"> · 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	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.	Nov-25: The IEA sighted the updated TMP (5-0105-112-PMA-00-PL-0017 Revision 1) which documents the maintenance of haul roads and access roads as a checklist (a part of the inspection process). The audit finding can be closed.	Closed
May-25_CEMP_01	CEMP S.5.2.2 Environmental Risk Assessment	Observation	May-25_CEMP_01 Environmental Risk Assessment The ERA did not include groundwater related risks or opportunities. This is raised as an Observation.	Nov-25: The IEA sighted an updated version of the Environmental Risk Assessment (Revision 1, 15/07/2025). The audit finding can be closed as the ERA has been updated to include risks related to groundwater.	Closed
May-25_CEMP_02	CEMP S.5.7 Site Environment Plan	Opportunity for improvement	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 as an Opportunity for Improvement.	Nov-25: The audit finding can be closed as the IEA sighted Site Environmental Plans on display at all visited site offices during the site audit, including at Hamilton Street.	Closed
May-25_CEMP_03	CEMP Section 7 Documents	Observation	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.	Nov-25: The Contractor has updated the environmental management plan process so that all sub-plans, including the Groundwater Management Procedure, sit under the QA page for the Construction Environmental Management Plan. The IEA sighted the update in the CEMP (5-0105-112-PMA-00-PL-0068 Revision 01, 13/11/2025). The audit finding can be closed.	Closed
May-25_CEMP_04	CEMP Section 7 Documents	Observation	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 as an Observation.	Nov-25: The Contractor has updated the environmental management plan process so that all sub-plans, including the Surface Water Management Procedure, sit under the QA page for the Construction Environmental Management Plan. The IEA sighted the update in the CEMP (5-0105-112-PMA-00-PL-0068 Revision 01, 13/11/2025). The audit finding can be closed.	Closed
May-25_CEMP_05	CEMP S.8 Checking	Observation	May-25_CEMP_05 Inspection - roles and responsibilities The roles and responsibilities listed do not reflect current roles and responsibilities. This is raised as an Observation.	Nov-25: The IEA sighted the updated CEMP (5-0105-112-PMA-00-PL-0068 Revision 01, 13/11/2025) which included updates to roles and responsibilities for the Environmental Representative and SME Support Role. The updates included additional responsibilities related to the management procedures attached to the CEMP, including environmental monitoring and reporting. The audit finding can be closed.	Closed
May-25_CEMP_06	CEMP Appendix O GWMP S.8 Inspections and Monitoring	Observation	May-25_CEMP_06 Groundwater Management Procedure - Inspections and Monitoring Roles and responsibilities regarding	Nov-25: This audit finding can be closed per commentary on May-25_CEMP_05.	Closed

Finding ID	Audit Criteria	Audit Category	Audit Finding	Current Status	Status (Open/ Closed)
			groundwater monitoring are not clear. This is raised as an Observation.		
May-25_CEMP_07	CEMP Appendix O GWMP S.8 Inspections and Monitoring	Observation	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.	Nov-25: Duplication of May-25_CEMP_06.	Closed
May-25_FFMP_01	FFMP Section 11.3 Inspections and Monitoring	Opportunity for improvement	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.	Nov-25: During the audit, the Contractor stated that the Environmental Inspection Checklist is a central template issued by the John Holland Group with limited capacity for project-specific updates. The IEA sighted a working version of the Flora and Fauna Management Plan (5-0105-112-PMA-00-PL-0046 Revision 2, to be issued in May 2026). Updates to the plan were captured in track changes and included that the weekly inspection checklist must include fauna (S.11.3). The IEA sighted an example of a checklist that recorded a fauna interaction with an echidna (Inspections_INS-0112294_20251114_Benalla). The audit finding can be closed.	Closed
May-25_TMP_01	TrMP Section 10.7 Inspections	Opportunity for improvement	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.	Nov-25: During the audit, the Contractor stated that the Environmental Inspection Checklist is a central template issued by the John Holland Group with limited capacity for project-specific updates. The IEA sighted a working version of the Tree Management Plan 5-0105-112-PMA-00-PL-0044 Revision 01, to be issued in 2026). Updates to the plan were captured in track changes and included text that the weekly inspection checklist must include TPZ (S.10.7). The IEA sighted an example of a checklist that recorded works within a TPZ that were supervised by an arborist (Inspections_INS-0112294_20250718_Benalla). The audit finding can be closed.	Closed

Appendix C - Photos

Item	Photo
<p>Photo 1_27-11-25_Hamilton St SEP</p>	

Photo 2_27-11-
25_Benalla Office Waste



Photo 3_27-11-25_Short
Street C&D Waste

