

8 July 2026

IRPL REF# 6-0000-210-EEC-00-LT-0157

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Department of Planning, House and Infrastructure
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Dear Katrina,

**CSSI 10055 Albury to Illabo (A2I) Project Independent Environmental Audit No 3
– 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 from 19th to the 21st of May 2026.

I am now pleased to be able to submit to you the Independent Environmental Audit report number 3 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 Belinda Jones, Head of Environment – Delivery on BJones2@artc.com.au or 0456 957 280 or myself on mclark@artc.com.au or 0414 757 817.

Yours sincerely

Signature: 
[Malcolm Clark \(Jul 9, 2026 17:09:04 GMT+10\)](#)

Email: mclark@artc.com.au

Malcolm Clark
Project Director A2I

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Attachment 1 - Response to I2S IEA 2 Audit Findings

Reference	Condition	Context	Audit Finding Details	Action / Status
A2I-03_NC-01	A37	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in APPENDIX A.	The Sloane's Froglet incident was identified on 19 November 2025 and initially notified to DPHI as an unexpected find on 21 November 2025. DPHI subsequently classified the event as a reportable incident via written directions, dated 19 December 2025. However, the formal incident notification was not submitted to DPHI until 16 January 2026. This exceeds the required 7-day timeframe and therefore does not comply with Condition A37 and Appendix A requirements. DPHI letter, dated 25 March 2026, also noted the delay in submitting the incident notification.	The finding is acknowledged. While the Sloane's Froglet discovery was initially reported to DPHI as an unexpected find on 21 November 2025, the requirement to submit a formal incident notification was not identified until DPHI issued written directions on 19 December 2025 classifying the event as a reportable incident. The formal notification was subsequently submitted on 16 January 2026, outside the required seven-day timeframe. The delay resulted from Christmas period office shutdowns and staff availability. Since this event, the project has reviewed and strengthened its incident management and approval processes to ensure reportable incidents are identified, escalated and submitted within the required timeframes. The project considers this an isolated administrative oversight and notes that communication with DPHI was maintained throughout the period. The corrective actions implemented will reduce the risk of similar delays occurring in the future.
A2I-03_NC-02	A38	The Planning Secretary must be notified via the Major Projects website within	A self-reported non-compliance was identified relating to the failure to	IRPL acknowledges that the non-compliance notification relating to the

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		seven days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	implement the Construction Cultural Heritage Management Plan (CCHMP) prior to the removal of timber fencing at The Rock Station. IRPL became aware of the non-compliance on 8 April 2026 following investigation and review of the CCHMP requirements. However, the non-compliance notification, dated 16 April 2026 and submitted to DPHI on 17 April 2026 (SSI-10055-PA-181), was not provided within the 7-day timeframe; therefore, a non-compliance was identified.	failure to implement the CCHMP prior to the removal of timber fencing at The Rock Station was not submitted within the required 7-day timeframe after becoming aware of the non-compliance on 8 April 2026. To prevent recurrence, IRPL has implemented a compliance notification tracking process that identifies reporting obligations, responsible personnel, and required submission deadlines. The process ensure non-compliance notifications are submitted to DPHI within the prescribed timeframes.
A2I-03_NC-03 (Self-reported)	C8	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: Condition (a) through to (o)	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification, dated 14 May 2026, relating to the Gate 6 at Albury Yard used as site entry for three construction vehicles on 6 May 2026. At the time of the event, track protection was not in place and vehicles were prohibited from entering the site via Gate A4 as advised by MR. IRPL became aware of the non-compliance on 7 May 2026.	Corrective actions implemented by IRPL and MR include: Reinforcement of the approved gate arrangements with site personnel, with Gate A4 confirmed as entry-only and Gate A6 as exit-only during the daily pre-start meeting. The auditor attended the pre-start meeting on 20 May 2026 and evidenced the communication of these arrangements. IRPL and MR will continue to reinforce adherence to the approved PTMP gate arrangements at the Albury Yard through pre-start briefings to prevent recurrence.
A2I-03_NC-04 (Self reported)	C15	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMF approved under Condition	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification, dated 24 March 2026, relating to a change in site access not reflected in the approved Albury Precinct Traffic Management Plan (PTMP) –	Corrective actions implemented by IRPL and MR include: Communication of the breach to all relevant project personnel by email, reminding staff that Olive Street is the

		C16). The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and Sub-plans have been endorsed by the ER and approved by the Planning Secretary or ER.	Stage B Rev. 0. During the February 2026 possession period, site vehicles were redirected to Kiewa Street as a safety precaution due to high-rail vehicles utilising the Olive Street access point; however, the approved PTMP was not updated to reflect this change in access arrangements prior to implementation. IRPL became aware of the non-compliance on 17 March 2026 following a post-possession review by Martinus Rail.	approved access point under the PTMP. - Update of the Albury Precinct Traffic Management Plan (PTMP) – Stage B to Rev. 1 to incorporate Kiewa Street (Gate M3) as a light vehicle access and egress point, approved by DPHI on 29 April 2026 (ref. SSI-10055-PA-183), with Albury City Council confirming no objection to the use of Gate M3 (email dated 22 April 2026). - Toolbox talk of the Murray River Bridge access and parking arrangements prior to the May 2026 possession, dated 3 May 2026. DPHI acknowledged the non-compliance notification (ref. SSI-10055-PA-174) as generally satisfying the reporting requirements via letter dated 27 April 2026. This non-compliance is now considered CLOSED.
A2I-03_NC-05 (Self-reported)	C15	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMP approved under Condition C16). The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP	The non-compliance was self-reported by IRPL to DPHI, dated 17 April 2026, relating to the partial removal of a section of timber fencing at The Rock Station. The fencing, identified in the Construction Cultural Heritage Management Plan (CCHMP) as a control demarcating the heritage exclusion zone, was removed during construction works without authorisation or assessment of impacts within the State Heritage Register (SHR) curtilage, representing a failure to implement the approved	Corrective actions implemented by IRPL and MR include: Review of the heritage significance of the impacted timber fencing by IRPL's Senior Cultural Heritage Advisor (incident report EVT-0041293, dated 8 April 2026), confirming that the unauthorised removal does not impact the overall significance of the State Heritage Register item (SHR #01269 – The Rock Station and Yard Group).

		and Sub-plans have been endorsed by the ER and approved by the Planning Secretary or ER.	CCHMP. IRPL became aware of the non-compliance on 8 April 2026.	Notification of Heritage NSW on 16 April 2026. Heritage NSW confirmed, in its response dated 13 May 2026, that the impacted fence has negligible heritage significance, that no works were undertaken outside the CIZ or within identified heritage exclusion zones, and recommended like-for-like repair as soon as reasonably practicable. This non-compliance remains OPEN pending IRPL's consultation with DPHI on the like-for-like reinstatement of the timber fence. Close-out will be verified at the next Independent Environmental Audit.
A2I-03_NC-06	C34	The results of the CMP(s) must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP. Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	Quarterly Monitoring Reports have not been submitted to CPHR and DCCEEW as required. As a result, a non-compliance has been identified.	IRPL acknowledges that Quarterly Monitoring Reports were not submitted to CPHR and DCCEEW in accordance with Condition C34. To address this non-compliance, IRPL has submitted all outstanding Quarterly Monitoring Reports to the relevant agencies on the 2 July 2023. IRPL has established a reporting and compliance tracking process that identifies reporting obligations, submission deadlines, and responsible personnel. The process includes reminder notifications and management oversight to ensure future Quarterly Monitoring Reports are submitted within the required timeframes and in accordance with Condition C34.

A2I-03_NC-07 (Self-reported)	E1	In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the construction and operation of the CSSI.	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification, dated 24 March 2026, relating to the dust emissions generated during loading of excavated spoil at the Wagga Wagga Yard site on 16 March 2026. At the time of the activity, dust suppression measures, including active watering, were not adequately implemented, contrary to the requirements of the Construction Air Quality Management Plan. The non-compliance was identified following a community complaint received on 16 March 2026 and subsequent investigation by Martinus Rail, with IRPL becoming aware of the issue on 17 March 2026.	Corrective actions implemented by IRPL and MR include: • Delivery of a dust mitigation toolbox talk on 17 March 2026 covering the use of water carts, stabilisation of stockpiles and exposed surfaces, dust cannons, revegetation, reduced vehicle speeds, cessation of work during high wind conditions, and the use of equipment fitted with dust suppression systems (attendance record sighted). • The complainant was door-knocked on 17 March 2026 and confirmed as satisfied with the response. This non-compliance is now considered CLOSED, with corrective measures implemented and verified during the audit.
A2I-03_NC-08 (Self-reported)	E74	Construction Noise Management Levels and Vibration Criteria Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration objectives: Condition (a) through to (e) Work that exceeds the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration CEMP Sub-plan.	The non-compliance was self-reported by IRPL to DPHI, dated 18 February 2026, relating to the vibration-generating works undertaken at the Cassidy Footbridge site on 7 February 2026 without implementing required mitigation measures for nearby sensitive receivers. IRPL became aware of the non-compliance on 12 February 2026 following the community complaint received on 7 February 2026.	Corrective actions implemented by IRPL and MR include: • Delivery of a toolbox talk on 11 February 2026 communicating the requirements for noise and vibration works, including stakeholder notification and attended vibration monitoring for nearby sensitive receivers in accordance with the Construction Noise and Vibration Management Plan. • Continued noise and vibration assessment for OOHV works during

		Note: The ICNG identifies ‘particularly annoying’ activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction NML.		May possession in consultation with Acoustic Advisor, as sighted. Close-out of the associated community complaint: Consultation Manager records confirm the MR site team met with the resident on 7 February 2026 to confirm vibration works had ceased, with the complaint closed the same day and details provided to the AA on 8 February 2026. This non-compliance is now considered CLOSED, with corrective measures implemented and verified during the audit.
A2I-03_NC-09	E78	Construction Noise and Vibration Impact Statements (CNVIS) must be prepared for work that may exceed the noise management levels, vibration criteria and/or ground-borne noise levels specified in Condition E74 and Condition E75 at any residence outside construction hours identified in Condition E69, or where receivers will be highly noise affected. The CNVIS must include specific mitigation measures identified through consultation with affected sensitive land use(s) and the mitigation measures must be implemented for the duration of the works. A copy of the CNVIS must be provided to the AA and ER prior to the commencement of the associated works. The Planning Secretary may request a copy/ies of CNVIS.	The non-compliance was identified with condition E78, which requires the Construction Noise and Vibration Impact Statements (CNVIS) must be provided to the AA and ER prior to commencement of associated works. No evidence was provided to demonstrate that the CNVIS were submitted to the ER.	IRPL acknowledges that evidence was not available to demonstrate that the Construction Noise and Vibration Impact Statements (CNVIS) were provided to the Environmental Representative (ER) prior to the commencement of associated works, as required by Condition E78. To address this finding, IRPL has implemented a review and assurance process to verify that all required documents, including CNVIS, are provided to the AA and ER before works commence. The process assigns clear responsibilities to ensure compliance with Condition E78 and prevent recurrence.

Opportunities for improvement				
A2I-03_OFI-01	B18	A website or webpage providing information in relation to the CSSI must be established before commencement of work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction.	The project website did not contain up to date documentation, e.g., Construction Environmental Management Framework (CEMF) rev.7, Construction Biodiversity Management Plan (CBMP) – Stage C Rev. 2, Sloane’s Froglet Management Plan (SFMP) – Stage C Rev.1, and Martinus Employee Code of Conduct Rev. B.	Following the audit, it was noted that the recent revisions of the CEMF, CBMP and SFMP were subsequently uploaded to the website. The IRPL project website will be updated and continually maintained with current information and documentation.
A2I-03_OFI-02	C15	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMF approved under Condition C16). The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and Sub-plans have been endorsed by the ER and approved by the Planning Secretary or ER.	The toolbox talk form for Murray River Bridge – Access & Parking, dated 3 May 2026, was identified as incomplete due to the absence of host and attendee signatures.	IRPL’s contractor Martinus has implemented a routine procedure across all sites whereby all records will be scanned and filed following each toolbox talk. The records saved include toolbox talk content, attendance sheet and permits relevant to each site. This measure will improve traceability of records.
A2I-03_OFI-03	C15	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMF approved under Condition C16). The CEMP and CEMP Sub-plans, as approved by the Planning Secretary,	Post-rainfall inspections and associated observations in Procore were not consistently closed out within required timeframes. Inspection #121 (dated 10 April 2026) remains open, with Observation 2251 still pending review despite a close-out due date of 22 April 2026. While the status was updated to	IRPL’s contractor Martinus has established a recurring inspection regime within their HSE Management System Procore. This measure will ensure observations are tracked and closed out in a timely manner, with appropriate evidence attached for traceability purposes.

		including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and Sub-plans have been endorsed by the ER and approved by the Planning Secretary or ER.	“ready for review” on 5 May 2026, no supporting evidence was attached. Additionally, inspection #94 (dated 3 March 2026) also remains open.	
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