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

IEA Six-Monthly Environmental Audit Report – May 2026

14 July 2026

IRPL Document No: 5-0105-112-EEC-00-RP-0002
IRPL Revision: 0

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Version Control

Revision No.	Date Issued	Description	Author	Approver
00	23 June 2026	Draft Audit Report for comment	MD/ JB	CF
01	14 July 2026	Final Report	MD/ JB	CF

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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 third six-monthly environmental audit for Inland Rail - Beveridge to Albury Phase 1 Tranche 2 Project (B2A) (the Project), covering the period from December 2025 through to May 2026. This audit was conducted by the Independent Environmental Auditor team on 19-21 May 2026. This report has been written as an exception report highlighting audit findings raised and associated audit commentary (Appendix A).

Summary of Findings

- **Findings Raised**: Eight (8) findings were identified, comprising:
  - One (1) non-conformance.
  - Six (6) opportunities for improvement.
  - One (1) observation.

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

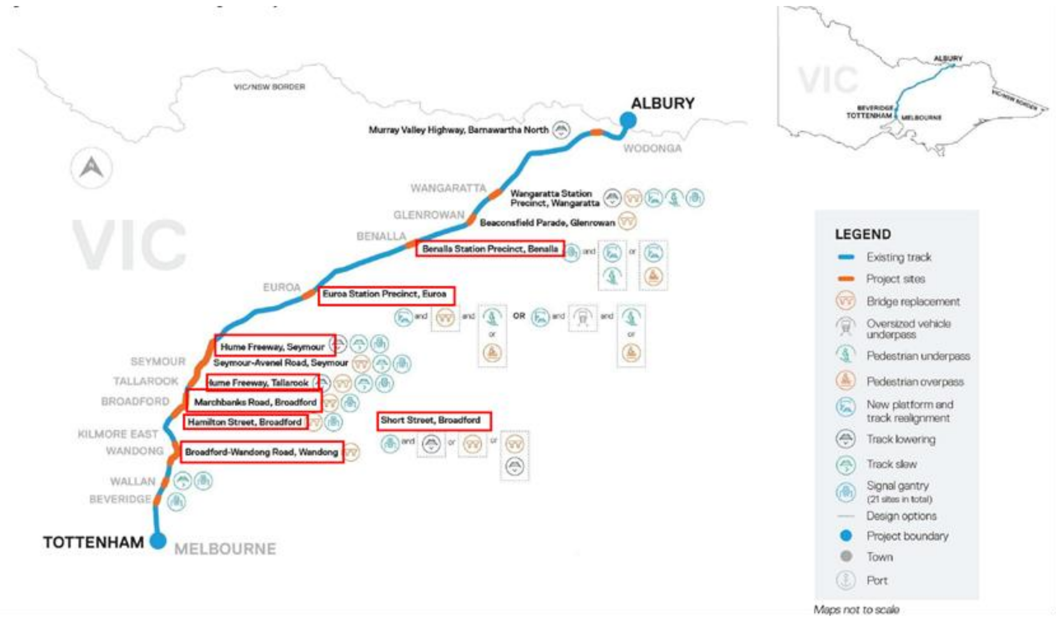

Figure 1 Schematic of Inland Rail Beveridge to Albury works and enhancement site (taken from EMF)

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	2.18.1 ENVIRONMENTAL AUDITS 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. 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: i. Contractor's environmental management requirements detailed in the Environment Management Framework (EMF), the CEMP, and the Environmental Performance Requirements (EPRs); ii. the requirements of the Contract; and iii. AS/NZS ISO 14001:2015. 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. d) The Contractor shall document any non-conformances identified during audits, which shall also be reported accordingly in the monthly environment report.
EMF Glossary of Terms – Independent Environmental Auditor	Undertakes environmental reviews and audits of project activities including assessing compliance with the Environmental Management Systems (EMS), Environmental Management Framework (EMF) and Environmental Performance Requirements (EPR's) Construction Environment Management Plan (CEMP) and other sub-plans.
EMF Roles & Responsibilities – IEA	• 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	• Appoint a qualified and experienced Independent Environmental Auditor (IEA) to confirm compliance with the Project's EMS, the EMF, EPRs, CEMP, and other sub-plans as and D&C Contract. The IEA will prepare environmental compliance reports (frequency to confirmed with Department of Climate Change, Energy, the Environment and Water (DCCEEW) and DELWP). These reports will be published on the ARTC website.
EMF Section 5.7 – Independent Environmental Auditor	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. The IEA will produce compliance reports to be provided to ARTC and D&C Contractor, these reports will be published on the ARTC website. 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).
EMF EPR EMF7 – Independent Environmental Auditor (IEA)	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.

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 third six-monthly environmental audit was conducted by the Independent Environmental Auditor team on 19-26 May 2026. This audit covered the period from December 2025 through to May 2026. Day 1 and Day 2 of the audit were held online, and Day 3 of the audit was conducted on site. A Close Out Session for previous audit findings was held online on 26 May 2026.

4.1.1 Sites and Construction Activities Audited

Table 4 Sites and construction activities audited

Sites	Activities	Audited
Broadford-Wandong Road, Wandong	N/A	No
Hamilton Street, Broadford	• Contaminated land and spoil, underground tanks	Yes
Short Street, Broadford	• Reinstatement and landscaping	Yes
Marchbanks Road, Broadford	• Environmental Management Framework, No Go Zones (including Scar Tree NGZ) • Contaminated land and spoil, stockpiling • Arboriculture, tree retention	Yes
Hume Freeway, Seymour	N/A	No
Euroa Station Precinct, Euroa	• Environmental Management Framework, Site Environmental Plan and Cultural Heritage Management Plan • Surface Water, drainage • Noise and vibration, vibration monitoring • Contaminated land and spoil, stockpiling	Yes
Benalla Station Precinct, Benalla	• Environmental Management Framework, Site Environmental Plan and Cultural Heritage Management Plan • Environmental Management Framework, No Go Zones • Arboriculture, tree retention and tree removals • Noise and vibration, noise controls • Historical Heritage • Contaminated land and spoil, stockpiling	Yes
Hume Freeway, Tallarook	• Environmental Management Framework, Site Environmental Plan and Cultural Heritage Management Plan • Environmental Management Framework, No Go Zones	Yes

Sites	Activities	Audited
	• Flora and Fauna, controls • Contaminated land and spoil, stockpiling	

4.1.2 EPRs Audited

A total of 35 EPRs were audited during the May 2026 audit.

Table 5 EPRs audited

Environmental Aspect	Environmental Performance Requirement
Environmental Management Framework	• EMF1: Environmental Management System (EMS) • EMF2: Construction Environmental Management Plan (CEMP) • EMF3: Environmental Risk Assessment • EMF4: No Go Zones (NGZs) • EMF5: Priority Avoidance Zones (PAZs) • EMF6: Training • EMF7: Independent Environmental Auditor (IEA)
Aboriginal Cultural Heritage	• AC1: Cultural Heritage Management Plan (CHMP)
Arboriculture	• AR1: Tree Management Plan (TrMP) • AR2: Tree Protection Zones (TPZs)
Flora and Fauna	• FF1: Flora and Fauna Management Plan (FFMP) • FF3: Temporary occupation • FF5: Existing Tracks • FF6: Tree Removal • FF7: Lighting • FF8: Night-time works • FF9: Wildlife Handler and Pre-clearance Surveys • FF10: EPBC Listed – Striped Legless Lizard (Delma impar) • FF13: Design Opportunities – Avoiding Native Vegetation Impacts • FF14: Planning Permit Application(s) – Removal of Native Vegetation
Groundwater	• GW1: Groundwater Management Procedures (GMPs) • GW2: Groundwater Monitoring – Broadford, Seymour, Wangaratta and Barnawartha North • GW3: Groundwater Monitoring – Benalla and Euroa
Noise and Vibration	• NV9: Out of Hours Work (OOHW)
Utilities	• U1: Utility Assets
Biosecurity	• BI1: Cleared vegetation • BI2: Clean fill
Contaminated Land and Spoil	• CL1: Contaminated Land and Spoil Management Plan (CLSMP)

Environmental Aspect	Environmental Performance Requirement
Historical Heritage	• HH1: Archaeological Management Plan (ArchMP) • HH3: Heritage Consents and Heritage Overlay • HH4: Unindentified Finds Procedure • HH5: Training • HH7: Minimise Impacts • HH9: Heritage Interpretation Strategy
Traffic	• T1: Traffic Management Plan (TMP) • T2: Disruption of Roads and Sharepaths

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
EMF8: Operational Handover	Operational EPR
CL2: Wangaratta Station Precinct	The Contractor is not delivering any scope of works within the Wangaratta Station Precinct
FF2: EPBC Listed – Powerline Project Area 1047 and Modelled Habitat	The Contractor is not delivering any scope of works within Powerline Project Area 1047
FF4: Earthworks – Powerlines Project Area	The Contractor is not delivering any scope of works within Powerline Project Areas
FF11: EPBC Listed – Powerline Investigation Areas 1001 and 1002, and Track Slew Wallan	The Contractor is not delivering any scope of works within Powerline Project Areas 1001 and 1002 or delivering Track Slew at Wallan
FF12: EPBC Listed – Powerline Investigation Area 1110	The Contractor is not delivering any scope of works within Powerline Project Area 1110
HH2: Heritage Permits	The Contractor 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)
HH6: Landscaping and Reestablishment of Trees	No landscaping anticipated within VHR overlays.
HH8: New Development	The Contractor and its design partners will ensure new development is response to relevant heritage places for Tranche 2 sites, however the Contractor is not undertaking works within the Glenrowan Heritage Precinct.

4.1.3 Documentation Audited

A total of seven (7) management plans were audited during the May 2026 audit.

Table 7 Documentation audited

Environmental Aspect	Document Number	Document	Revision
Construction Environmental Management Plan	5-0105-112-PMA-00-PL-0068	Construction Environmental Management Plan	02
Groundwater	5-0105-112-PMA-00-PL-0068	Groundwater Management Procedures (Appendix O to the CEMP)	02
Flora and Fauna	5-0105-112-PMA-00-PL-0046	Flora and Fauna Management Plan	01
Arboriculture	5-0105-112-PMA-00-PL-0044	Tree Management Plan	01
Contaminated Land	5-0105-112-PMA-00-PL-0045	Contaminated Land and Spoil Management Plan	01
Noise and Vibration	5-0105-112-PMA-00-PL-0048	Construction Noise and Vibration Management Plan	01
Historical Heritage	5-0105-112-PMA-00-PL-0047	Archaeological Management Plan	01

5 Audit Findings

5.1 Contractor Performance

During the audit, conformance was demonstrated for 115 (93%) of the criteria audited (does not take in account the “not applicable” category). On-ground positive environmental impact was observed where the Contractor has strived not to only meet conformance but exceed this in some cases. The Contractor provided logs from the project to the Supporting Hughes Creek Macquarie Perch Population Resilience and Recovery project. In addition, the Contractor is exceeding flora and fauna requirements onsite with 3D printed nest boxes to provide arboreal fauna habitat. The 3D printed nest boxes are a project innovation that are monitored via camera traps. 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 36 EPRs audited, 28 were found compliant, and eight (8) had findings raised against them.

Table 8 Overall audit findings raised from this audit

Finding classification	Findings from this audit
Non-conformance	1
Opportunity for Improvement	6
Observation	1
Total	8

5.3 Overall Audit Findings

Finding classification	Findings raised from May 2026 audit	Findings closed during May 2026 audit	Findings remaining open from previous audits
Non-conformance	1	0	0
Opportunity for Improvement	6	5	4
Observation	1	3	3
Total	8	8	7

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					
May-26_EPR_EMF_1	**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.	**Non-conformance**	The Contractor has developed and implemented the Construction Environmental Management Plan (CEMP). CEMP S4.4.2 No Go Zones defines No Go Zones (NGZs). NGZs to be implemented by the Project are identified and further detailed within the relevant Management Plans as per CEMP Table 6. NGZs 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. Delineation and communication of NGZs is undertaken in terms of both extent and type of NGZ. This includes: - Clearly visible, wildlife friendly fencing and signage for protected vegetation - Fencing of Aboriginal cultural sensitivity areas in line with the respective Cultural Heritage Management Plan (CHMP) - TPZ fencing in line with AS 4970-2009 Protection of trees on development sites - Fencing of heritage areas and extents where practicable - Heritage inductions undertaken in line with the relevant permits/consents - Identification and display of NGZs on applicable SEPs and the Project GIS - Identification of NGZs on construction drawings as required EPR EMF4 states that "The Contractor must define No Go Zones (NGZs) in the CEMP where Project construction activities and works are not permitted". During the site audit at Tallarook on 21 May 2026, the IEA sighted stockpiling within a NGZ on the eastern side of the track at Tallarook, including old logs and clearing material including topsoil. The Contractor provided minutes from a fortnightly environmental approvals meeting between Department of Energy, Environment and Climate Action (DEECA), Department of Transport and Planning (DTP), Inland Rail Pty Ltd (IRPL) and the Contractor. The minutes, dated 27 March 2025, confirmed that DEECA had advised that "Root balls, debris and logs can be to be retained on site in the nearby vegetation for local animals". In addition, an excavator, roller and a loader were observed within multiple Tree Protection Zones (TPZs) which may also	**EPR EMF4 Non-conformance:** EPR EMF4 states that No Go Zones are areas "where Project construction activities and works are not permitted". On the eastern side of the track at the Tallarook Site, the IEA observed construction plant within Tree Protection Zones which may be associated with the NGZ. EPR EMF4 also requires NGZs to be "clearly marked on all maps". The IEA observed that the same NGZ was not included on maps within the Tallarook Site Environmental Plan (SEP). The Tallarook SEP states that NGZs controls include appropriate signage, however the IEA also did not observe visible signage at the NGZ on the eastern side of the track at Tallarook.	5-0105-112-PMA-00-PL-0068 Construction Environmental Management Plan, Rev 02, dated 26/05/2026 DEECA/DTP/Inland Roal/ John Holland Approvals Fortnightly Meeting Tranche 2 minutes, dated 27/03/2025 5-0105-112-PMA-50-PL-0001 Tallarook Site Environmental Plan, Revision 2, dated 07/05/2026 ACT-0195099 Soteria Action completed 05/05/2026 Photo 1_21-05-2026_Tallarook NGZ

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
			be associated with the NGZ (Photo 1). The Contractor stated that in this location, additional trees were being retained (exceeding project requirements) and that NGZ flagging had been recently moved forward to accommodate the additional tree retention. Therefore, the vegetation impacted may not be associated with the NGZ. In addition, the Contractor stated that there are no permit controls in place to access the NGZ. This has been raised as a non-conformance. EPR EMF4 states that "NGZs will be clearly marked on all maps and construction drawings prior to works commencing in proximity to the NGZ". The IEA observed the Tallarook Site Environmental Plan (SEP) which contained mapping with significant ecological values including vegetation listed under the Commonwealth *Environment Protection and Biodiversity Conservation (EPBC) Act 1999* and native vegetation, with legend items corresponding to NGZs and vegetation that could be removed. The IEA observed that the map did not include NGZ fencing around "Listed Vegetation- no go zone" on the eastern side of the track at Tallarook. This has been raised as part of the non-conformance. The Tallarook SEP also presents NGZ controls including "Establish Environmental No Go Zones using high visibility bunting or temporary construction fencing (including erosion fencing if necessary) and appropriate signage. Erection of fencing must be reviewed by a qualified ecologist". During the site audit, the IEA observed that NGZ bunting was in place on the eastern side of the track at Tallarook, however, no signage was visible. This has been raised as part of the non-conformance. Prior to rail occupation works in Tallarook, the Contractor marked trees for clearing. The IEA sighted an action raised on Soteria (ACT-0195099) to re-do the NGZ fencing during tree marking works. The action was closed on 5 May 2026.		
May-26_EPR_AR_1	**AR1 Tree Management Plan (TrMP)** The Contractor, in consultation with ARTC, a qualified arborist and local Council, must prepare and implement a Tree Management Plan (TrMP) to outline measures that will be undertaken to prevent unauthorised impacts to trees. The TrMP must be in accordance with any relevant conditions of approval and must include (without limitation): · Roles and responsibilities · Maintain a Tree Register identifying which trees are to be retained or removed having regard to condition, arboricultural value, biodiversity value, heritage value, amenity value and landscape character of the place · Measures to confirm the condition, arboricultural value and biodiversity value of the trees to be removed · A requirement to consult an arborist to determine appropriate protection and/or management	**Opportunity for improvement**	The Contractor has developed and implemented Tree Management Plan (TrMP). The TrMP outlines arboricultural management measures including tree removal, protection, and monitoring processes. Within the audit period, there has been some limited tree removal associated with the latest rail occupation works. During the audit, the Contractor explained that an initial arborist impact assessment was undertaken to establish baseline conditions, with subsequent assessments undertaken to assess trees further and inform design and tree removal decisions. An example of the subsequent assessments was sighted by the IEA (Arboricultural Impact Assessment- Tallarook Rail and Bridge Works, Rev 1, dated 02/2026) and included tables identifying assessed trees and trees approved	**EPR AR1 Tree Data Discrepancy Opportunity for Improvement:** There is a discrepancy in the number of trees between the pre-construction arborist assessment and the latest arborist assessment. The process on how this impacts the consolidation of the tree register (as specified in EPR AR1) is not clear.	5-0105-112-PMA-00-PL-0044 Tree Management Plan, Rev 1, dated 17/11/2025 Arboricultural Impact Assessment- Tallarook Rail and Bridge Works, Rev 1, dated 02/2026. 5-0105-112-PMA-00-PL-0046 Flora and Fauna Management Plan, Rev 1, dated 6/03/2025 02. Tree Group List Combined spreadsheet

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	measures for potentially impacted trees · Pre- and post-construction inspections of retained Scattered Trees or trees not within a NGZ to ensure there have been no unauthorised impacts · Measures for the establishment of Tree Protection Zones (TPZs) (for Large Trees in Patches and Scattered Trees) and NGZs with protective fencing and signage · Measures to clearly mark TPZs and NGZs (including the 1m buffer) and the works area limit on all maps and construction drawings prior to commencement of relevant Project construction activities · Details of reporting requirements.		for removal. Impacted trees were clearly identified and linked to design requirements. The IEA sighted a Tree Register (02. Tree Group List Combined). The Contractor stated that the register is currently being consolidated to reflect final removal and retention outcomes due to ongoing staged works with a key focus on meeting offset targets. The Contractor noted that the Project is currently retaining more vegetation than was proposed in pre-construction environmental assessments. For example, the IEA sighted Aconex transmittals regarding an alignment change to the SUP in Wandong to enable tree retention (JH-RFIE-000955). The IEA also sighted the updated SUP alignment on Civillo (the Project GIS system). The IEA sighted the Arboricultural Impact Assessment - Tallarook Rail and Bridge Works which was informed by pre-construction arborist assessments. The assessment identifies the limitation that there were more trees observed compared to the pre-construction arborist assessment. The report did not state a reason for the discrepancy, but it is likely due to saplings at the time of the pre-construction assessment that now meet the definition of a tree. The impact of the difference in tree numbers between the pre-construction and construction arborist assessments on the consolidation of the tree register (as specified in EPR AR1) is not clear. This has been raised as an opportunity for improvement. The Contractor explained that there are a number of measures to confirm ecological values (including trees and native vegetation) prior to removal. TrMP S7.2.4 states that the tree removal process will be controlled under the Clearing Permit process. This is further detailed in the 5-0105-112-PMA-00-PL-0046 Flora and Fauna Management Plan, Rev 1, dated 6/03/2025. The IEA sighted a pre-clearance report for Tallarook (PER/B2A/01013 Tallarook NE tree removal) which confirmed trees and native vegetation to be removed prior to removal. No Go Zones have been addressed in Finding May-26_EPR_EMF_1.		JH-RFIE-000955 Re: Broadford Wandong Rd – Footpath relocation PER/B2A/01013 Tallarook NE tree removal, dated 20/04/2026
May-26_EPR_FF_1	**FF7 Lighting** The Contractor must apply Best Practice Lighting Design as stipulated in the National Light Pollution Guidelines for Wildlife (2020) to avoid/minimise light spill into adjacent habitat at all work sites, with particular care taken at Tallarook due to the ecological sensitivity of the site.	Opportunity for improvement	The Contractor has developed and implemented the Flora and Fauna Management Plan (FFMP). FFMP Appendix B: Plan Requirements Traceability Matrix states that EPR FF7 is addressed in FFMP S8 and the Air Quality Management Plan. The FFMP does not specify how the National Light Pollution Guidelines for Wildlife (2020) has been reviewed and relevant items applied to the Project including activities that are temporary in nature such as the most recent rail occupation at Tallarook where lighting has been installed. This has been raised as an opportunity for improvement.	**EPR FF7 Lighting Opportunity for Improvement**: Best Practice Lighting Design as stipulated in the EPR and in the National Light Pollution Guidelines for Wildlife (2020) has not been reviewed and relevant items applied to Project activities.	5-0105-112-PMA-00-PL-0046 Flora and Fauna Management Plan, Rev 1, dated 06/03/2025. Photo 2_21-05-2026_Tallarook Lighting Towers

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
			FFMP S8.2.4 includes the following control measure applicable to lighting: "Lighting must be directed away from trees and NGZs. Lighting should be spot checked regularly by Site Supervisor to ensure light spill is not impacting trees and NGZs." During the site audit, the IEA observed directional light towers which are evidence of a measure to reduce light spill at Tallarook (see Photo 2) with the lighting directed away from vegetation. The Contractor also showed images from Tallarook and Wandong night works where light spill was minimised by turning off lighting that was in close proximity to vegetation that was not critical for the works.		
Management Plan Findings					
May-26_CEMP_01	**Construction Environmental Management Plan – Section 8** Checking • Monitoring • Inspections • Auditing o Internal Auditing o Independent Environmental Auditor (IEA) •Assessment and Analysis of Environmental Performance Requirements and environmental approvals o Obligations Tracking with IRPL • Reporting o Inland Rail Monthly Reporting • Record keeping	Observation	The Contractor has developed and implemented the Construction Environmental Management Plan (CEMP). CEMP S8.1 - the CEMP states that "Equipment calibration records will be maintained on PPW and the JH SharePoint." During the audit, the Contractor outlined how equipment calibration records are maintained on PPW, SiteHive and the JHG Equipment Register which represents a minor discrepancy in process from what is described in the CEMP. The IEA sighted the SiteHive dashboard, calibration certificates uploaded to SiteHive, and the JHG Equipment Register dashboard. The IEA also sighted evidence of the Contractor submitting Calibration Certificates to PPW via email correspondence. This has been raised as an observation. CEMP S8.2 – As detailed in S8.2, the Contractor manages weekly environment inspections and high-risk inspections through Soteria. The IEA sighted the following two examples of weekly environment inspections during the audit period, including associated actions: - Tallarook inspection dated 3 May 2026. An action was raised to replace spill kit materials (ACT-0194092) and was closed on 22 May 2026. - Benalla inspection dated 5 March 2026 (INS-0110066). An action was raised to delineate the TPZ from legacy stockpiles (ACT-0190900) and was closed on 9 April 2026. CEMP S8.3 – As documented in S8.3, internal audits (including high risk audits and EMS audits) are managed by the JHG head office and tracked in Soteria. CEMP S8.4 - The Contractor maintains two version of the approvals register, one on excel and the other on Soteria which were both sighted by the IEA. The excel version (*B2A External Approvals Register*) is the working version for the Project Environment Team and includes the Inc Doc, EPBC decision, heritage approvals, CHMP and EPA approvals. The Soteria version is maintained for EMS compliance. In addition, the Contractor has a *B2A Obligations Register* where EPR	**CEMP S8 Checking Observation**: The CEMP specifies that calibration records are kept in PPW and the JH SharePoint, however they are also kept on SiteHive and the JHG Equipment Register.	5-0105-112-PMA-00-PL-0068 Construction Environmental Management Plan, Rev 02, dated 26/05/2026 SiteHive Dashboard - Devices & Monitoring Points dated 19/05/2026 SiteHive Calibration Certificate (HEX 000379 dated 01/12/2025) JHG Equipment Register Dashboard (PRJ-06653-01) dated 19/05/2026 Email correspondence between Project Environmental Manager (JHG) and Quality Manager (RNA) dated 12/06/2025 B2A External Approvals Register B2A Obligations Register Tallarook Weekly Environmental Inspection, dated 3 May 2026 ACT-0194092 Soteria Action completed 22 May 2026 INS-0110066 Weekly Environmental Inspection, dated 5 March 2026

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
			compliance is tracked. The IEA sighted the register and all EPRs had a compliance status of "Compliant" or "In Progress". CEMP S8.5 - This section outlines reporting including monthly reporting to IRPL. In addition, the Contractor is required to inform IRPL within 24 hours of any incident (including report only incidents). The IEA sighted an example of email correspondence between the Project and IRPL to inform of a report-only incident (INC-0111957) dated 20/04/2026. CEMP S8.6 - This section outlines record keeping. There were no updates to this section since the previous revision of the FFMP.		ACT-0190900 Soteria Action completed 9 April 2026 Email correspondence between Project Environmental Advisor (JHG) and IRPL dated 20/04/2026
May-26_CNVMP_ 01	**Construction Noise and Vibration Management Plan – Section 12** Monitoring and Reporting • Conditions Survey • Inspections and Audits • Construction Noise and Vibration Monitoring o Short-term Attended Noise and Vibration Monitoring o Continuous Unattended Noise Monitoring o Reporting o Non-conformance, Incident Reporting, and Investigation	Opportunity for improvement	The Contractor has developed and implemented Construction Noise and Vibration Management Plan (CNVMP). CNVMP S12.1 – The Contractor stated that all private properties (including residences and heritage sites) were offered a dilapidation survey prior to works with additional dilapidation surveys being undertaken as required or in response to property owner concerns. The IEA sighted monitoring undertaken at property at highest risk from vibration impacts. CNVMP S12.2 – The Plan identifies that inspections will include noise and vibration spot checks and weekly environmental inspections. CNVMP S12.3 - During the audit, the Contractor shared the Vibration Monitoring Register (B2A-MPR-ENV-004). The Register included links to Vibration Monitoring Reports. The IEA sighted Vibration Monitoring Report VMC003 which was undertaken at a sensitive location in response to a community complaint regarding piling. The report included a combination of attended and non-attended monitoring. CNVMP S9.3 provides targets for short-term vibration (Table 20) which are provided as Peak Component Particle Velocity (PPV; mm/s). The vibration monitoring report (VCM003) sighted by the IEA included PPV (mm/s) and the Contractor identified that this had been manually calculated from monitoring data. The process for the manual conversion is not detailed in the CNVMP. This has been raised as an opportunity for improvement. The vibration monitoring report (VCM003) did not include any vibration thresholds used to determine compliance with CNVMP S9.3. This has been raised as an opportunity for improvement.	**NVMP S12 Monitoring and Reporting Opportunity for Improvement**: The IEA sighted attended vibration monitoring records that applied a manual conversion to determine PPV (the vibration threshold metric listed in CNVMP S9.3). The CNVMP does not detail the manual conversion process. In addition, attended monitoring records were not observed to include the vibration threshold used to determine compliance with CNVMP S9.3 thresholds.	5-0105-112-PMA-00-PL-0048 Construction Noise and Vibration Management Plan, Rev 1, dated 13/11/2025 B2A-MPR-ENV-004 Vibration Monitoring Register VMC003 Vibration Monitoring Report including vibration monitoring
May-26_FFMP_ 01	**Flora and Fauna Management Plan - Section 4** Requirements • Project Scope & Requirements • Environmental Management Framework	Opportunity for improvement	The Contractor has developed and implemented the Flora and Fauna Management Plan (FFMP). FFMP S4.4 – The Plan identifies the ARTC (Inland Rail) target of "a minimum 5% ecological enhancement" and identifies	**FFMP S4 Requirements Opportunity for Improvement:** The method and tracking for the 5% enhancement requirement is not clearly defined and lacks detail on how the requirement will be achieved.	5-0105-112-PMA-00-PL-0046 Flora and Fauna Management Plan, Rev 1, dated 06/03/2025

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
	• Sustainability Requirements • Inland Rail objectives and targets		examples of how enhancement could be achieved. The Plan does not specify the approach (including tracking) to achieve the target. This has been raised as an opportunity for improvement.		
May-26_TrMP_01	**Tree Management Plan – Section 9** Targets, Deliverables and Timing • TrMP Targets	Opportunity for improvement	The Contractor has developed and implemented the Tree Management Plan (TrMP). TrMP S9 - The method and tracking mechanism for achieving the 13% canopy cover targets was not clearly defined. The Contractor noted that this should be easily achieved through the Project's tree retention measures.	**TrMP S9 Targets, Deliverables and Timing Opportunity for Improvement:** The method and tracking of targets listed in TrMP Table 5 including the mechanism for achieving canopy cover targets (e.g., 13%) were not clearly defined and lack detail on how the requirement will be achieved.	5-0105-112-PMA-00-PL-0044 Tree Management Plan, Rev 1, dated 17/11/2025
May-26_TrMP_02	**Tree Management Plan – Section 10** Auditing, Monitoring and Reporting • Management Review • Updating of this Plan • Continuous Improvement • Lessons Learnt • Internal Auditing • Independent Environmental Auditor • Inspections • Monitoring • Reporting • Non-conformance, Incident Reporting, and Investigation	Opportunity for improvement	The Contractor has developed and Tree Management Plan (TrMP). TrMP S10 outlines the checking activities including auditing, monitoring and reporting. TrMP S10.1 - A management review has not been undertaken but is planned as a part of the EMS review in the coming month. TrMP S10.3 - Continuous improvement is demonstrated through corrective actions ensuring controls are in place and effective, addressing audit findings from internal and external audits. TrMP S10.4 - There are no lessons learnt to note that were communicated to the workforce related to arboricultural matters. TrMP S10.5 - There were no internal audits undertaken during the audit period. TrMP S10.7 - Measures to protect retained trees are regularly inspected to ensure controls are in place. All inspections and corrective actions are recorded in Soteria. Although the weekly environmental inspection checklist does not contain specific questions relating to tree protection zones or associated controls, these matters must still be addressed and documented as part of the inspection process to ensure compliance with Project requirements. The IEA sighted multiple weekly inspections including the Benalla inspection dated 5 March 2026 (INS-0110066) where corrective actions included the delineation of the TPZ from legacy stockpiles (ACT-0190900) which was closed on 9 April 2026. Table 6 details inspections and monitoring for performance and includes periodic monitoring of tree condition by the Project Arborist at an "as required" frequency during works. The IEA noted that this contradicts a statement in TrMP S10.8 that "the Project Arborist will carry out regular inspections of the TPZs and monitor tree condition, tree protection measures, and impact of site works which may arise from changes to the approved plans". The Contractor confirmed that arborist involvement is undertaken where required (e.g. during	**TrMP S10.7 Inspections Observation:** TrMP S10.8 states that "the Project Arborist will carry out regular inspections". TrMP S10.7 Table 6 states that arborist inspections are undertaken "As required". During the audit, the Contractor confirmed that inspections are undertaken as required.	5-0105-112-PMA-00-PL-0044 Tree Management Plan, Rev 1, dated 17/11/2025 INS-0110066 Weekly Environmental Inspection, dated 5 March 2026 ACT-0190900 Soteria Action completed 9 April 2026

Finding ID	Audit Criteria	Audit Category	Audit Commentary	Audit Finding	Evidence
			assessment or high-risk activities) rather than as a regular or continuous monitoring presence. This has been raised as an observation. TrMP S10.8 – This section details monitoring activities by the Project Arborist including regular inspections of TPZs and monitoring of tree condition, tree protection measures, and impact of site works which may arise from changes to the approved plans. This section also details the final certification of retained vegetation. TrMP S10.9 – This section details reporting requirements including monthly reporting. The Contractor explained that non-conformances, incident reporting, and subsequent investigation will be undertaken, as required, and in accordance with the CEMP.		

Appendix B – Previous Audit Findings

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ 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**: TrMP updated, out for reissue in Dec-25 pending audit findings. Section 10.7. Refers to weekly Enviro and Sustainability Inspection. Audit finding remains open. **May-26:** The IEA sighted TPZ controls being checked in multiple Enviro and Sustainability Inspection checklists and actions raised relating to this topic. This audit finding can be closed as this aspect is being inspected regardless of whether there is a specific question in the Enviro and Sustainability Inspection template.	**Closed**
May-25_EPR_EMF_04	**EPR EMF04 No Go Zones (NGZs)** The Contractor must define No Go Zones (NGZs) in the CEMP where Project construction activities and works are not permitted. The NGZs must be established prior to commencement of relevant construction activities or works to protect retained areas of native vegetation, areas of significant ecological or heritage values, and where appropriate ensure construction activities and works avoid areas of contaminated soil. The NGZs must identify all threatened species and threatened ecological communities close to works to prevent unintentional impacts and be provided with suitable buffers, as informed by a qualified ecologist. The NGZ must be established utilising fencing that is; clearly visible, wildlife friendly and provides appropriate protection and signage identifying the area as a 'No Go Zone'. The location and the NGZs will be based on the final Project design and will be detailed in the FFMP prepared in consultation with, and to the satisfaction of DELWP. NGZs will be clearly marked on all maps and construction drawings prior to works commencing in proximity to the NGZ. NGZs will be maintained until the completion of works that may impact (including indirectly or accidentally) on the significant ecological or heritage values protected by the NGZ.	Observation	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.	**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". **May-26:** The IEA sighted the updated Clearing Permit (Revision B) which included a new section in the event NGZ fencing cannot be used to delineate sensitive vegetation from the area subject to clearing. Rev B of the Clearing Permit is now in use. The Flora and Fauna Management Plan (5-0105-112-PMA-00-PL-0046 Revision 2, to be issued in May 2026) is undergoing internal review at the time of May-26 audit. The audit finding can be closed once the Flora and Fauna Management Plan Rev 02 is issued and provided to the IEA for information.	**Open**
Nov-25_EPR_BI_03	**BI3 Clean fill** 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.	Opportunity for improvement	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 *auditing* 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.	**May-26:** The IEA was provided the Biosecurity Management Plan (BMP; 5-0105-112-PMA-00-PL-0042 Rev 01) which was issued for use on 11 June 2026. Updates include reference to EPR BI3 and the addition of documentation handover in S8.2.1. The BMP identifies that a "risk-based" approach will be adopted for clean fill documentation. The IEA is satisfied that a risk-based approach could be adopted. However, the specific documentation and how the risk-based approach will be implemented are not defined in the BMP. There are ongoing discussions between the Contractor and IRPL on auditing requirements and what handover documentation will be provided. The audit finding can be closed once further discussions between the Contractor and IRPL determine the approach to this EPR and once the next revision of the Biosecurity Management Plan is issued with further detail on documentation and the risk-based approach.	**Open**

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ Closed)
Nov-25_EPR_CL_01	**CL1 Contaminated Land and Spoil Management Plan (CLSMP)** 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. The CLSMP must include (without limitation): 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 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.	Observation	S.8.2 of the CLSMP does not capture any new or recent designations. This is raised as an Observation.	**May-26:** The IEA sighted a working document of the Contaminated Land and Spoil Management Plan (5-0105-112-PMA-00-PL-0045 Rev 01). Updates include the addition of the A17 permit and waste designation information in S8.2. There are no further waste designations to be obtained for the project at this stage. The audit finding can be closed once Revision 2 of the Contaminated Land and Spoil Management Plan is issued.	**Open**
Nov-25_EPR_CS_01	**CS1 Community and Stakeholder Management Plan (CSMP)** 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): 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	Opportunity for improvement	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.	**May-26:** The IEA sighted a working version of the Respite and Relocation Management Plan (5-0105-112-PMA-00-PL-0079, Rev 0.2). Updates include the addition of how businesses are managed in S4, S5, S6 and S7. The audit finding can be closed once Revision 0.2 of the Respite and Relocation Management Plan is issued for use and provided to the IEA for information.	**Open**

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ Closed)
	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).				
Nov-25_EPR_CS_03	**CS3 Complaints Management Process** 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 – 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.	Opportunity for improvement	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 requirement. This is raised as an Opportunity for Improvement.	**May-26:** The IEA received a summary of environmental complaints via Aconex (Aconex Reference: JH-GCOR-010791) and sighted the environmental complaints for May 2026. The Contractor will provide a summary of environmental complaints to the IEA each month moving forward. The IEA is satisfied this finding can be closed.	**Closed**
Nov-25_EPR_SU_03	**SU3 Minimise greenhouse gas emissions** 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. 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.	Opportunity for improvement	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.	**May-26:** The Contractor meets with DEECA regularly and with the EPA as required. This is confirmed by the process outlined in the CEMP. Although the Project is more than 50% complete and any changes to the approach will not result in material outcomes, it was discussed that in future meeting with DEECA and EPA there is an opportunity to communicate more on the approach and progress on how the Project is achieving this EPR. The audit finding can be closed once this additional consultation piece can be documented.	**Open**
Nov-25_EPR_SU_07	**SU7 National Pollutant Inventory (NPI)** 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 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	Opportunity for improvement	Project documentation does not demonstrate that EPR SU7 does not apply. This has been raised as an Opportunity for Improvement.	**May-26:** The Contractor confirmed that the Project does not exceed the National Pollutant Inventory (NPI) reporting threshold. As of October 2025, the Project had consumed 694,770 L of diesel across all eight sites. To meet the NPI reporting threshold, the Project would have to consume approximately 476,000 L of diesel at a single site. The IEA did not sight documentation to demonstrate that EPR SU7 does not apply. The audit finding can be closed once documentation is sighted by the IEA.	**Open**

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ Closed)
Nov-25_EPR_SW_03	**SW3 Surface Water Management Procedures (SWMPs)** 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 and wastes and EPA Victoria Environmental Reference Standard – Surface Waters. The SWMPs must include (without limitation): 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.	Observation	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.	**May-26:** The IEA is satisfied that IRPL are reflective of ARTC being the referred stakeholder as referenced in EPR. This finding can be closed.	**Closed**

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ Closed)
Nov-25_CEMP_ 01	**Construction Environmental Management Plan - Section 5.7.2** 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: • 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	Sensitive receivers were not shown on the SEP at the Hamilton Street compound. This is raised as an Observation.	**May-26:** The IEA sighted the Hamilton Street Site Environmental Plan (5-0105-112-PMA-20-PL-0001 Rev 2.0) which included sensitive receivers on the mapping. The finding can be closed.	**Closed**
Nov-25_AQMP_01	**AQMP** Control Measures • Trigger Action Response Protocol (TARP)	Opportunity for improvement	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.	**May-26:** The IEA was provided the Air Quality Management Plan (AQMP; 5-0105-112-PMA-00-PL-0043 Rev 01) which was issued for use on 11 June 2026. The AQMP which includes ERS and TARP thresholds. The SiteHive triggers have been updated in line with the ERS and TARP. Where there is discrepancy between ERS and TARP thresholds, the lowest value is set as the trigger. The finding can be closed.	**Closed**

Finding ID	Audit Criteria	Audit Category	Audit Finding	Status	Status (Open/ Closed)
Nov-25_AQMP_02	**AQMP** Monitoring and Reporting • Inspections and audits o Independent Auditing • Monitoring • Reporting • Non-conformance, incident reporting and investigations	Opportunity for improvement	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.	**May-26:** The IEA was provided the Air Quality Management Plan (AQMP; 5-0105-112-PMA-00-PL-0043 Rev 01) which was issued for use on 11 June 2026. The AQMP which includes ERS and TARP thresholds. The SiteHive triggers have been updated in line with the ERS and TARP. Where there is discrepancy between ERS and TARP thresholds, the lowest value is set as the trigger. The finding can be closed.	**Closed**
Nov-25_SuMP_01	Sustainability Management Approach • Overview • Embedding Sustainability • Sustainability in Design • Sustainability in Procurement • Sustainability in Construction • Sustainability risks and opportunities • Innovation • Climate change risk assessment	Observation	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.	**May-26:** The IEA was provided the Sustainability Management Plan (5-0105-112-PMA-00-PL-0052 Rev 01.1) which was issued for use on 28 May 2026. S6.6 Sustainability risks and opportunities had not been updated to describe important aspects of the sustainability risk management process on the Project including the Workplace Risk Assessment. The audit finding can be closed once the Sustainability Management Plan is updated to include important aspects of the sustainability risk management process on the Project including the Workplace Risk Assessment and is issued for use and provided to the IEA for information.	**Open**
Nov-25 _SWMP_01	**Surface Water Management Procedures**	Opportunity for improvement	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.	**May-26:** The IEA was provided the Construction Environment Management Plan (5-0105-112-PMA-00-PL-0068 Rev 02) which was issued for use on 26 May 2026. Updates sighted by the IEA include S.6.2 of the Surface Water Management Procedure including more detail on how the Project Scope Requirement meeting "IECA Best Practice Erosion and Sediment Control" and how this is applied to onsite management to sediment, drainage and erosion control. The Contractor provided evidence that the CEMP Revision 02 was issued for use of 12 June 2026 (Reference: JH-TRANSMIT-000113). The IEA is satisfied that this finding can be closed.	**Closed**
Nov-25_WMP_01	**Waste Management Plan - Section 7.3** 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. ➢ 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, 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	Observation	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.	**May-26:** The IEA sighted an action raised on Soteria (ACT-0194704) to install bin signage. The action was closed on 29 May 2026. During the site audit, the IEA sighted additional signage placed at bins in Benalla. In addition, the Contractor provided evidence of a waste Toolbox Talk completed in November 2025. The IEA is satisfied that the finding can be closed.	**Closed**

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	➢ 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.				

Appendix C - Photos

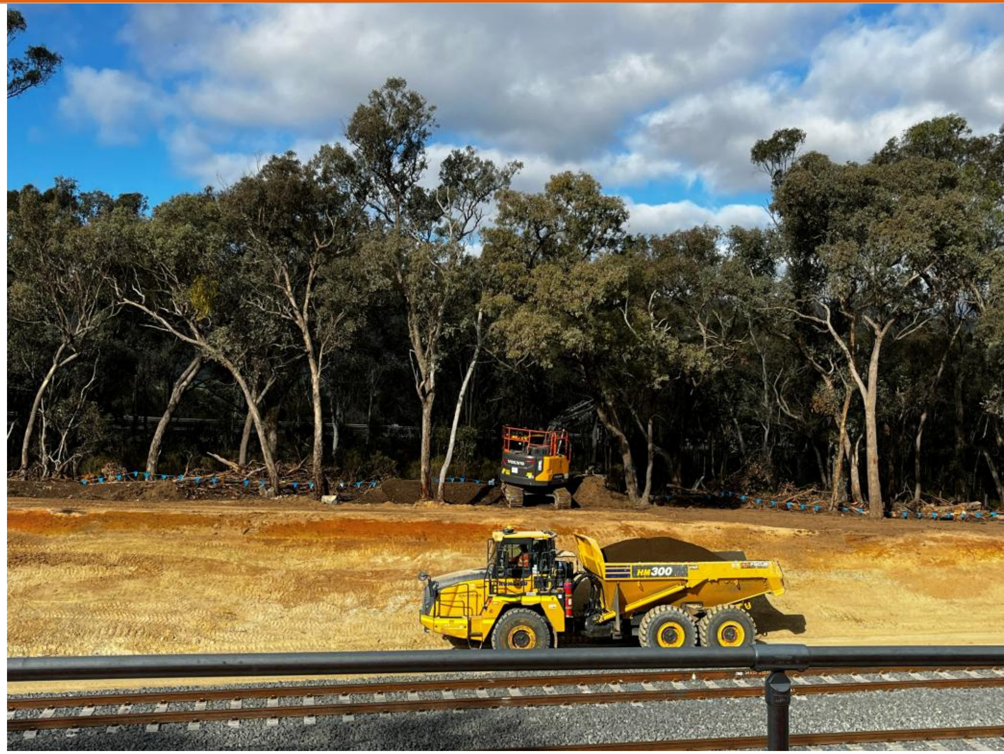
Item	Photo
Photo 1_21-05-26_Tallarook NGZ	

Photo 2_21-05-26_Tallarook Lighting Towers