Third-Party Environmental Compliance Audit, WORM Pipeline – Construction audit

13 July 2023

AVENTUS consulting
Environmental & Safety Management for the Energy Industry

Prepared by:
Aventus Consulting Pty Ltd
ABN: 68 100 174 202
Suite 302, 75 Tulip Street, Cheltenham, Victoria, 3192
www.aventusconsulting.com.au
Ph: 0409 772 170

Prepared for:
APA Management Services Pty Ltd
ABN: 58 091 668 110
Level 25, 580 George Street, Sydney, NSW 2000
www.apa.com.au
Ph: 03-8626 8400

Document Control

File number		153_APA_WORM_audit_Rev1			
Rev	Date	Description	Prepared	Reviewed	Approved
1	13/07/2023	Re-issued final report	GP	-	IS
0	07/07/2023	Final report	GP	-	IS, ST
A	30/06/2023	Draft for APA review	GP, SA	IS, ST	-

Report Distribution

This report becomes an uncontrolled document when printed. Report distribution assumes latest version issued.

Recipient	Company	Position
Ian Spence	APA	Acting Access & Approvals Manager, SE Australia
Steve Talbot	APA	Environmental Advisor

Front cover photo: WORM Pipeline welding, Donovans Lane (KP39). Photo taken by G. Pinzone.

TABLE OF CONTENTS

Attachments

Acronyms

Acronym	Meaning
APA	APA Group
CEMP	Construction Environmental Management Plan
DEECA	Department of Energy, Environment and Climate Action (Vic)
DELWP	Department of Environment, Land, Water and Planning (Vic) (former)
EMP	Environmental Management Plan
EMS	Environmental Management System
KP	Kilometre Point
OFI	Opportunity for Improvement
ROW	Right-of-Way
SSEMP	Site-Specific Environmental Management Plan
WORM	Western Outer Ring Main

1. Introduction

APA Group (APA) contracted Aventus Consulting Pty Ltd (Aventus) to undertake regulatory third-party compliance audits for the construction of the Western Outer Ring Main (WORM) gas pipeline.

A condition of project approval is that a suitably qualified external auditor is contracted to audit compliance against the WORM Project's Construction Environmental Management Plan (CEMP), with the auditor selection being subject to approval from the Department of Environment, Land, Water and Planning (DELWP) (now the Department of Energy, Environment and Climate Action, DEECA) under the *Pipelines Act* 2005 (Vic).

In consultation with DEECA (DELWP at the time), APA has determined that four compliance audits will take place, these being:

- Initial pre-construction audit (late September 2022);
- Construction progress audit (early 2023);
- Reinstatement completion audit (mid-2023); and
- Close-out audit (two years after the end of construction, notionally mid-2025).

This audit report addresses the second audit.

1.1 Aventus Consulting

Aventus is a Melbourne-based environmental consultancy that has been operating since 2009, specialising in environmental and safety approvals, assurance and auditing for the energy industry. The company partners with titleholders and contractors to obtain project environmental and safety approvals and guide these approvals through to project completion through assurance and compliance work.

Aventus has undertaken over 60 environmental compliance audits, with 32 of these related to pipeline construction and operations, including:

- QCLNG Project – 11 pipeline-specific audits (construction, rehabilitation operations), with an additional 19 Environmental Authority (EA) audits that factored in pipeline activities (Qld);
- Origin Energy – Halladale Speculant pipeline construction (Vic);
- Santos – Central Project Area, Munro, Marengo, East & West EAs (Qld); and
- Cooper Energy – Athena gas pipeline cutover (Vic).

More information about the company can be found on its website at: www.aventusconsulting.com.au

1.2 Objectives

The objective of the construction audit is to verify that pipeline construction is being undertaken in accordance with the APA CEMP and associated sub-plans. The APA CEMP was approved by the then DELWP on the 26th of July 2022.

1.3 Limitations

Due to the inherent limitations of any compliance audit (i.e., its 'snap-shot' nature), it is possible that error or non-compliance may occur and may not be detected. A one-off compliance audit cannot detect all instances of compliance or otherwise with the conditions as set out in the approval documents, as the audit is not performed continuously throughout the duration of the project.

The content of this report applies only to matters that were available to and/or evident to the auditors at the time of this audit and within the scope of the audit. The status of legal compliance can change in a limited time.

No other warranty, expressed or implied, is made as to the professional advice indicated in this report. Note that it may not contain sufficient information for the purposes of other parties or for other uses.

The hundreds of conditions audited within the CEMP and sub-plans meant that an infinite amount of time could be spent determining the level of compliance for each. Where compliance was unable to be determined after multiple requests for information, and given the finite time available to the auditors, in many instances a finding of 'observation' was provided.

The conclusion reached in Section 3 of this report is formed on the basis outlined above.

2. Audit Process

2.1 Methodology

This field and desktop audit was conducted in line with *AS/NZS ISO 19011:2018, Guidelines for auditing management systems*, which is summarised in Figure 1.

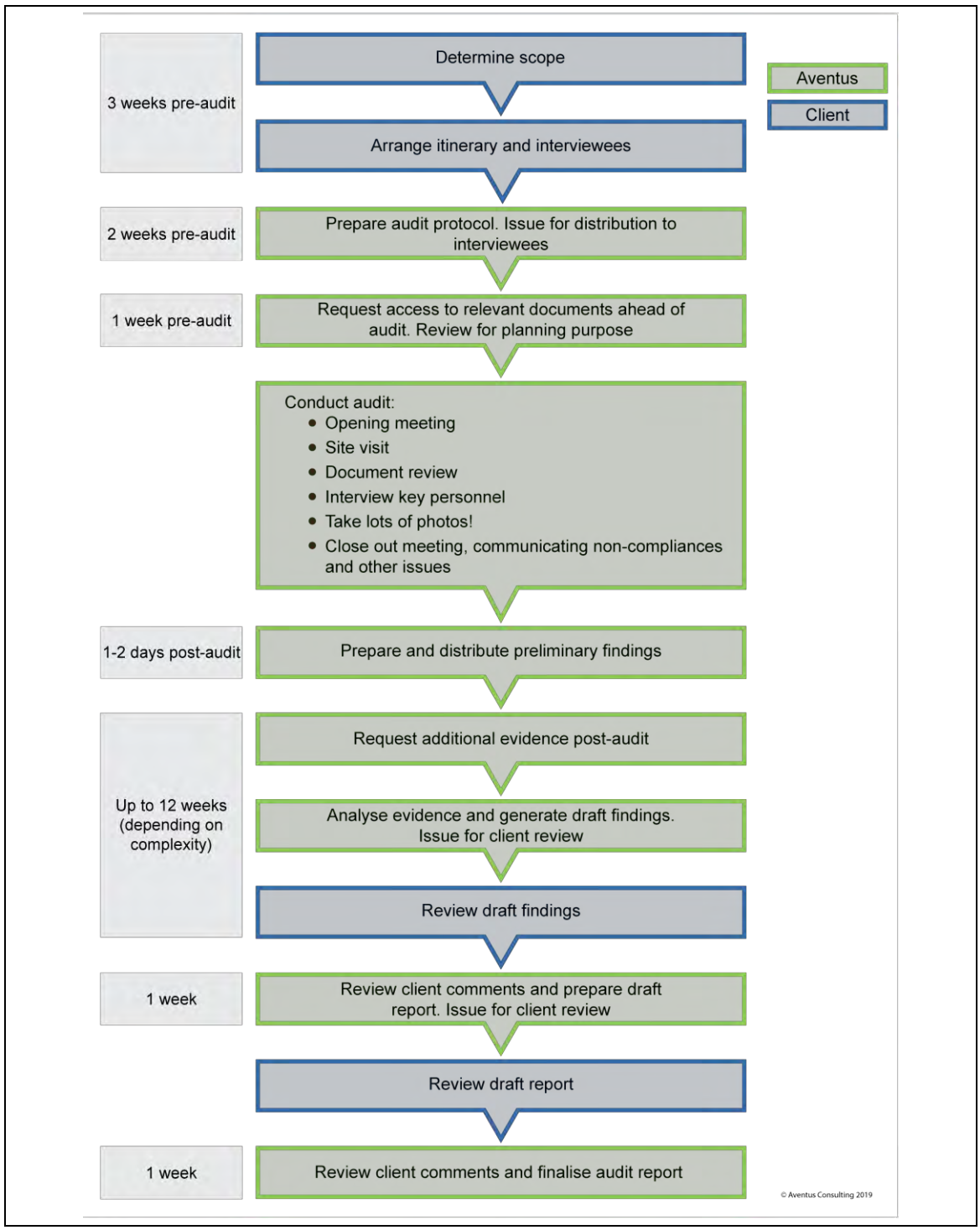


Figure 1. Generalised audit schedule

2.2 Auditors

The audit team consisted of Giulio Pinzone as Lead Auditor and Siena Adorno as Assistant Auditor. Brief biographies are presented here.

2.2.1 Giulio Pinzone, Principal Environmental Consultant – Lead Auditor

Giulio Pinzone is the Principal Environmental Consultant at Aventus and has over 20 years' environmental management experience. Giulio is degree-qualified with a Bachelor of Applied Science (Natural Resources Management) and Bachelor of Science (Honours).

Giulio is an Exemplar Global-accredited Environmental Management Systems (EMS) Lead Auditor (certificate 129371). DELWP (now DEECA) approved Giulio to be the lead auditor for this audit series via email (Mr Don Hough, DELWP, 29th of August 2022).

Giulio has undertaken over 70 environmental compliance audits, with his pipeline experience listed in Section 1.1. Prior to founding Aventus, Giulio undertook several pipeline construction environmental compliance audits for GasNet (now APA) and Santos. Giulio held the role of Field Environment Advisor during the construction of the Casino Gas Pipeline in southwest Victoria and is very familiar with pipeline construction environmental management issues.

2.2.2 Siena Adorno, Environmental Consultant – Assistant Auditor

Siena Adorno is a graduate Environmental Consultant who is learning about all facets of the energy industry, including its unique environmental management challenges and regulatory framework.

Siena does not have any formal auditing qualifications and this audit formed part of her professional development. Siena was also the assistant auditor for the pre-construction audit.

2.3 Auditees

The auditors thank the personnel listed in Table 1 for their assistance during the audit.

Table 1. Auditees

Name	Title	Company
Pipeline right-of-way		
Ian Spence	Acting Access & Approvals Manager, SE Australia	APA
Kim Stewart	Environmental Advisor	APA
Kim Heberling	Environmental Advisor	APA
Renee James	Environmental Advisor	APA
Richard Sharp	Environment Manager	Spiecapag
Wollert compressor station		

Name	Title	Company
Kevin Anderson	Construction Supervisor	APA
Ross Clarke	HSE Advisor	Wasco
Steve Talbot	Environmental Advisor	APA

2.4 Audit Process

The process undertaken for this audit is outlined below.

- Aventus prepared an audit protocol which was distributed to APA ahead of the audit.
- APA provided auditees (including Spiecapag and Wasco) with a copy of the audit protocol in advance of the audit.

Day 1

- The auditors were provided a project induction at the Essendon project site office on 15th February 2023.
- The auditors conducted a brief opening meeting with several of the APA team (**Attachment 1**).
- The auditors were provided an update on construction progress and undertook a brief document review in the office.
- The auditors were accompanied by several APA Environment Advisors to several sites along the pipeline construction right-of-way (RoW) – in order, kilometre points (KPs) 0, 2.0, 3.3, 5.0, 8.8, 10.5 and 16.8 – before returning to the Essendon site office.

Day 2

- The auditors attended the Wollert compressor station site and attended a brief site induction.
- The auditors were guided around the site by the Construction Supervisor throughout the morning.
- In the afternoon, the APA Environment Advisors accompanied the auditors to several sites along the pipeline construction RoW – in order, KPs 49.5, 49.0, 48.0, 43.0, 42.0 and 39.1 – before returning to the Essendon site office.
- The auditors requested a list of relevant documents based on the observations over the two days.
- A brief exit meeting was held with auditees at the conclusion of the day, discussing preliminary findings (**Attachment 1**).
- A list of preliminary findings was issued to APA two business days after the audit.

3. Audit Findings

3.1 Definitions of Findings

APA has requested that the audit findings are reported in accordance with the definitions provided in *APA HSE GP 15.01 T1 Audit and Self-Assessment Supplementary Information*, which is presented in Table 2.

Table 2. APA audit finding definitions

Category	Definition
Acceptable	Compliant with requirements.
Major non-conformance	• A complete or near complete absence of a required management system; and/or • Supporting system document is available but the requirements are, to a large degree, not implemented (being followed); and/or • Where the design intent of a management system significantly fails to produce the required results; and/or • Where a number of related minor non-conformances indicates that a management system fails to produce the desired results or control.
Minor non-conformance	Where a non-conformance(s) is considered to have only a minor effect on the overall management system.
Observation	The auditor has observed an area that appeared not to conform but could not confirm a non-conformance.
Opportunity for improvement	A suggestion for improvement.
Not applicable	The requirement is not applicable in this instance.

3.2 Audit Results

This section summarises the findings of the audit. A total of 675 conditions were audited, with Table 3 presenting a list of documents audited.

Several CEMP sub-plans were partially audited but could not be audited in full due to time constraints, and as such are not discussed further in this report. These are the:

- Tree Management Plan (27 conditions);
- Fauna Management Plan (125 conditions); and
- Minor Watercourse Crossing Management Plan (142 conditions).

Table 3. List of audited documents

Document	Version	Conditions
APA CEMP	Rev 10	200
Wasco CEMP	Rev D	137
Deep Creek Site Specific EMP	Rev 1	125
Merri Creek Site Specific EMP	Rev 1	152
Conservation Area 28B	Rev 0	61
	Total	**675**

3.3.1 Audit evidence

In addition to the visual observations during the field inspection, over 170 document records were examined as part of this audit. These are listed throughout **Attachment 2** and compiled in **Attachment 3**.

3.3.2 Summary Findings

A summary of the audit findings is provided in Table 4. These results indicate a full level of compliance with the APA CEMP has been achieved.

Table 4. Summary of results

Document	Acceptable	Major non-conformance	Minor non-conformance	Observation	OFI	N/A
APA CEMP	118	0	3	18	24	37
Wasco CEMP	65	1	0	22	4	45
Deep Creek SSEMP	32	2	1	48	6	36
Merri Creek SSEMP	54	0	1	29	6	62
Conservation Area 28B	17	3	2	23	1	15
TOTAL	**286**	**6**	**7**	**140**	**41**	**195**
Percentage	**42.4%**	**0.9%**	**1.0%**	**20.7%**	**6.1%**	**28.9%**

Most of the 'Not applicable' findings relate to the post-construction and rehabilitation phase of the project, which will be addressed in a subsequent audit.

Detailed findings against each of the conditions are provided in **Attachment 2**. During the site inspections, photographs were taken to support the audit findings; key photos supporting the audit findings are provided in **Attachment 4**.

3.3.3 Positive Observations

The following positive observations were made:

- The office-based environmental induction is very detailed and addresses key issues in the CEMP and sub-plans.
- APA had what appeared to be a sufficient number of field environmental advisors on the project. The 50 km long construction RoW is a large area to cover, but the advisors appeared to fulfil their supervisory responsibilities well.
- Spiecapag had a single back-to-back Field Environmental Advisor role. This did not appear to be sufficient to ensure full oversight of construction contractors, as was evident by a small but known list of outstanding actions that were visible during the field inspection.
- Environmental signage and demarcation along the construction RoW was very clear and appeared well enforced.
- Good communication was observed between the environmental advisors for APA and Spiecapag, which appeared to lead to rapid resolution of potential non-conformances.
- Noting the significant rainfall prior to and during the early phase of construction, the construction RoW appeared stable with no evidence of significant soil erosion.
- For the most part, records for all conditions exist and were readily obtainable.

3.3.4 Major Non-Conformances

Table 5 summarises the six (6) major non-conformances, which represent 0.9% of the audited conditions.

Table 5. Summary of major non-conformances

Condition	Finding
Wasco CEMP	
B3 - Contractor Awareness Before commencing site work, all Project personnel must attend an induction that outlines environmental management requirements. This must include: • No-go zones. • Biodiversity values of the construction corridor, specifically areas of native vegetation and threatened species habitat. • Habitat and fauna awareness. • Location of other environmentally sensitive areas. • Native vegetation removal regulations and penalties for non-compliance.	The induction presentation lists what the CEMP addresses and notes that a hard copy is available in the office/crib. The induction register verifies all personnel are inducted. However, the presentation does not go into detail regarding the requirements of this condition. APA provided additional induction extracts that contained environmental elements, however, none that relate to the requirements outlined in this condition were addressed.

Condition	Finding
• EPBC Act and FFG Act regulations and penalties for non-compliance.	
Deep Creek SSEMP	
Monitoring HDD activities have a low likelihood of causing instream water quality impacts, therefore, water quality monitoring will occur by daily visual observation of water quality during the Deep Creek HDD. The visual water quality observation will be required in the Daily Environment Inspection.	Daily inspection checklists for Deep Creek do not address water quality checks and the environmental aspects register also does not contain water quality visual checks.
Monitoring Any observation of contamination, pollution or sedimentation will be recorded and investigated to identify the cause. If Project construction is the cause, corrective actions will be used to manage the impact.	Daily inspection checklists for Deep Creek do not address water quality checks, so it cannot be determined whether contamination, pollution or sedimentation of the creek occurred.
Conservation Area 28B	
Soil monitoring Soil monitoring will be undertaken visually during the Daily Environmental Inspection. Visual monitoring will identify areas of soil erosion and signs of sodic and dispersive soil.	The Spiecapag Environmental Advisor stated that no daily environment inspections had been undertaken for Conservation Area 28b.
Phytophthora Inspections for signs of phytophthora dieback will be undertaken during the Daily Environment Inspection.	The Spiecapag Environmental Advisor stated that no daily environment inspections had been undertaken for Conservation Area 28b.
Monitoring Monitoring will be undertaken through Daily Environmental Inspection during construction.	The Spiecapag Environmental Advisor stated that no daily environment inspections had been undertaken for Conservation Area 28b.

3.3.5 Minor Non-Conformances

Table 6 summarises the seven (7) minor non-conformances, which represent 1% of the audited conditions.

Table 6. Summary of minor non-conformances

Condition	Finding
APA CEMP	
Land use (LU7) Compile and maintain a schedule of Landholder Agreements, documenting actions to be carried out on each property.	Property Management Plans were sighted (e.g., WPT059, WPT067 & WPT072). APA advised that no schedule/register is used to record actions to be carried out on each property.
Landscape and visual (LV3) Remove machinery, materials and temporary infrastructure from construction area as soon as it is no longer required. Keep construction laydown areas tidy and minimise dust in accordance with EMM AQ1.	The auditors did not sight any infrastructure that was not in use or witness any untidy sections of the RoW during the field inspection. Dust did not appear to be an issue during the field inspection. The following complaints regarding tidiness of laydown areas and dust are in the complaints register: • Complaint received 23/2/23 'Dust on Parkland Crescent getting into cars and properties.' • Complaint received 19/04/23, summarised as: o The area has been generally left in bad condition and the workers were disrespectful. o Her nature strip has now gone. o Their letterbox has been knocked over and propped back up and left against the fence. o The same thing has happened to other letterboxes in the street. o Damage was done to the top of their fence, but they have already had this fixed. • Complaint received 9/05/23 - Resident complained about 'mess' on the road around the work area and safety issues with overtaking trucks.
Waste (W9) Mats/plastic ground covers will be used to capture coating overspray.	Auditors witnessed pipe coating at KP 5. No mats or plastic ground covers were in place.
Deep Creek SSEMP	
HDD work method statement (6) Undertake daily inspections and constant monitoring during HDD activities to identify any loss of fluid.	Daily inspection report dated 20 December 2022 contains a check for the presence of sump pits, however, there are no checks that refer to monitoring of the sumps.
Merri Creek SSEMP	
Survey set out and demarcation	The auditors did not sight signposts denoting the 1-in-100-year ARI at Merri Creek, however, based on

Condition	Finding
Speicapag will survey and signpost the 1-in-100-year ARI at Merri Creek which will state that all stockpiles are to be stored above the 1-in-100-year ARI flood level. Refer to Merri Creek Erosion and Sediment Control Plan for image of 1-in-100-year ARI level (Appendix H).	Appendix H of this SSEMP, the auditors can verify the topsoil stockpiles were outside of the 1-in-100-year ARI level (i.e., within the RoW, away from the watercourse banks).
Conservation Area 28B	
Speicapag will reduce the construction impact as far as reasonably practicable within Conservation Area 28b by: • Clearly marking out the Project boundary and installing exclusion fencing with signage along the edge of the RoW to prevent unauthorised access into the Conservation Area. • Exclusion fencing will be monitored daily and rectified immediately if found to be damaged or not in place.	The auditors sighted the exclusion fencing with signage along the edge of the RoW at KPs48, 49 & 49.5. No evidence has been reviewed by the auditors to verify exclusion fencing is monitored daily (i.e., daily inspections, with Speicapag advising that nil had been undertaken at the time of the field inspection).
<u>Soil monitoring (5.3.2)</u> Corrective actions will be used to manage any hazards or non-conformances identified in the Daily Environment Inspection per SCA's CEMP.	The corrective actions register and incident register do not contain any incidents at Conservation Area 28b. Given that daily environment inspections for this area are not undertaken (per above), the likelihood of picking up issues requiring corrective actions is compromised.

3.3.6 Observations

There are 141 observation findings, which represent 20.7% of the audited conditions. These are generally classified as follows:

- Visual confirmation of the condition could not be made during the field inspection (e.g., the construction methodology, such as clear and grade and dewatering or a section of the construction RoW was not inspected).
- Evidence in the form of documentation was not available.
- Evidence in the form of documentation was not provided.
- The condition was not specific enough to be auditable. For example, there are numerous conditions referring to entire Acts of Parliament, National Environment Protection Measures (NPEM) or construction guidelines (such as IECA Best Practice Guidelines, an 86-page document).

3.3.7 Opportunities for Improvement

There are 41 opportunities for improvement (OFI), which represent 6.1% of the audited conditions. These are generally classified as follows:

- The need for evidence to be clearer (e.g., documents missing document control).
- The need for more recent evidence.
- Documentary evidence was not available to verify verbal evidence, when documentary evidence would've normally been expected.
- Plans do not address the entire requirements of a condition.
- Several sections of open pipe were missing fauna caps (e.g., at KPs 49, 49.5 and 48) because enough caps had not been ordered.
- Several example of poor waste segregation (e.g., diesel engine oil included in general waste bin at the Melton Highway HDD site, KP 3.3).
- Advice that no hydrotesting had taken place, which contradicted hydrotest records.
- Reports for several reportable incidents were not sighted.
- Erosion and sediment controls not correctly installed or poorly maintained.

3.3.8 Not Applicable

There are 195 findings of 'not applicable', which represent 28.9% of the audited conditions. These are generally classified as follows:

- Rehabilitation works (which are the subject of the next audit).
- Sites that required visual inspection were not visited during the field inspection.
- Safety or engineering aspects that are outside the scope of this audit.
- Night-time works did not take place for several conditions.
- Acid sulphate soils had not been encountered.
- At the compressor station site, hydrotesting had not taken place and noise and vibration were not an issue.
- Trenching and/or backfilling had not been witnessed at various locations.

The conditions related to rehabilitation will be addressed in the proceeding audit.

3.3.9 General Notes

Given the unusually large number of findings noted as 'observations' and 'not applicable', the following general points are made:

- The number of conditions in the two main CEMPs and associated sub-plans is unusually high in the Lead Auditor's opinion. This makes it extremely difficult to audit all conditions and to do so in a time efficient manner.
- A large number of conditions refer to legislation or guidelines in general, without specifying relevant sections. This makes it impossible to audit against.

It is outside the scope of the audit to provide suggestions on how to resolve these issues, but the Lead Auditor is open to providing advice on this should it be requested.

4. Conclusion

The audit results provide assurance to APA that there is a low level of non-conformance (1.9%) with the WORM Pipeline CEMP and associated EMPs.

The systems, plans and procedures in place to ensure that the CEMP conditions are met are adequate, with no systemic issues of significance identified.

In the opinion of the Lead Auditor, APA's field environmental management is on par with best practice environmental management.

Attachment 1

Opening and closing meeting
attendance records

WORM Pipeline construction compliance audit

Opening meeting attendance sheet

Date: 15 February 2023 Time: 8.45 am

Name	Title/Role	Signature
1. Giulio Pinzone	Auditor	
2. Siena Adorno	Trainee auditor	SienaAdorno
3. Ian Spence	Acting Access & Approvals Manager APA	
4. Renée James	Environmental Advisor	
5. Kim Stewart	Env Advisor, APA	
6. RICHARD SHARP	Enviro Manager	
7. Kim Heberling	Enviro advisor, APA	
8.		
9.		
10.		
11.		
12.		

WORM Pipeline construction compliance audit

Exit meeting attendance sheet

Date: 16 February 2023 Time: 16:25

Name	Title/Role	Signature
1. Giulio Pinzone	Auditor	
2. Siena Adorno	Trainee auditor	
3. Ian Spence	Acting Manager Access + Approvals SE APA	
4. Kim Heberling	Enviro advisor APA	
5. Kim Stewart	Env adviser APA	
6. RICHARD SHARP	Enviro Manager Spiceapog	
7.		
8.		
9.		
10.		
11.		
12.		

Attachment 2

Detailed audit findings

WORM Commitments Register (APA CEMP v10)

CEMP Section	Title	Text extract from CEMP	Commitment	Audit finding	Document reference	Compliant?
Risk assessment						
7.1	Risk Assessment	The register will also be regularly evaluated by APA as part of the assurance processes identified in Section 11. Inspections, monitoring and auditing will be used to ensure the controls outlined in this CEMP are in place and working effectively. More specifically, it will serve to confirm: -That management measures are being implemented - That management measures have achieved their intended outcomes, or on track to achieve intended outcomes: o That identified environmental risks have been eliminated or minimised so far as reasonably practicable; and o That specified environmental performance objectives are met. - Compliance with applicable statutory requirements	Regularly' evaluate Project risk register	Weekly Environmental Meeting Minutes sighted for 17/01/23, 2/02/23, 1/03/23. The minutes include agenda, new actions & open actions.	Weekly Environmental Meeting Minutes (pdf) Risk Register - Excel spreadsheet.	Acceptable
7.1	Risk Assessment	In addition to the risk assessment process, task-based risk assessments (e.g. Job Safety and Environment Assessments) will be undertaken by contractors to identify and control workplace hazards	Prepare JSEAs (or equivalent)	Safe Work Method Statements (SWMS), the equivalent of JSEAs, were sighted for environmental works (18035-SWM-HSE-0075) and Fauna Catcher Spotter Activities SWMS (18035-SWM-HSE-0076).	Environmental works SWMS (18035-SWM-HSE-0075) Rev B dated 9/12/22 Fauna Catcher Spotter Activities SWMS (18035-SWM-HSE-0076) Rev 3 dated 9/12/22	Acceptable
Emergency preparedness & response						
9	Emergency preparedness and response	An Emergency Response Plan (ERP) will be developed by the principal contractors based on the outcome of a risk assessment of credible site emergencies and their impacts. The contractor's plan will be reviewed and is subject to APA approval.	ERP is in place.	The auditors sighted the Spiecapag ERP (Rev 0, Sept 2022) and Wasco ERP Rev 0, Sept 2022). Both documents contain an APA stamp of approval.	Spiecapag ERP (18035-PL-ER-0002) Wasco ERP (18035-PL-ER-0003)	Acceptable
9	Emergency preparedness and response	For works taking place on existing APA facility assets or near existing APA pipeline assets, an Emergency Response Bridging Plan will be prepared to define the circumstances in which the National Emergency Response Management Plan (320-PL-ER-0001) or the Contractor's Emergency Response Plan take precedence and coordinate the response between the project and APA Operations.	Prepare an Emergency Response Bridging Plan	The auditors sighted the Infrastructure Development Emergency Response Bridging Plan Western Outer Ring Main (WORM) Pipeline (18035-PL-ER-0004), which is approved by the APA project manager.	Infrastructure Development Emergency Response Bridging PlanWestern Outer Ring Main (WORM) Pipeline (18035-PL-ER-0004)(1/09/2022 Rev 1)	Acceptable
9	Emergency preparedness and response	Relevant personnel will be trained to understand roles and responsibilities and the use of emergency response resources.	Relevant Personnel will be trained in emergency response planning	The auditors sighted an emergency debrief record for a Bushfire Emergency drill at KP0 conducted on 30/1/23. SCA advised that supervisors are given spill response procedure information that are then displayed at sights and discussed in TBT. **OFI:** A training matrix would have been a clearer tool in identifying those who have undergone specific training (i.e., emergency response).	Evacuation Attendance Record (SCA-HSE-FOR-012)	Opportunity for improvement
9	Emergency preparedness and response	Emergency response exercises/drills will be conducted in accordance with Pipelines Regulations 2017. This includes: • when the response arrangements are introduced; and • when the response arrangements are significant amended; and • not later than 12 months after the most recent test.	Undertake emergency response exercises/drills	The Spiecapag ERP was issued for use on 19 September 2022. **OFI**: Auditors do not have a record of the most recent test.		Opportunity for improvement
Training & awareness						
10.1	Training and Awareness	Relevant project personnel, sub-contractors, consultants and visitors will receive inductions prior to commencing work on site. This will include a standard APA HSE induction to cover overall business-wide requirements and a project-specific induction.	Induction of project personnel	Auditors attended the project induction in person at the Essendon site office on 15/02/23. Auditors witnessed sign off system upon completion of induction. The training and induction register verifies personnel and visitors have been inducted. Sticker system on hard hats is in place to show who has been inducted.	Training and induction register spreadsheet	Acceptable
10.1	Training and Awareness	• key requirements of this CEMP such as: o No go areas and locations of sensitive environmental communities and species, and the requirements for working in sensitive areas or with sensitive species o General environmental duty, duty to respond to harm, duty to notify of incidents and other environmentally related duties o Community awareness o Biosecurity o Operating hours including criteria for noise and vibration o Vehicle operation rules – speed limits, inspections, hygiene o Smoking, hot works and fire hazard awareness o General and regulated waste management.	Induction to include all itemised elements	Induction slideshow was sighted on 15/02/23 and provided digitally. Induction includes majority of itemised elements (in column c). **OFI:** Smoking, hot works and fire hazard awareness is not contained within the induction slideshow.	Environment induction slideshow	Acceptable

10.1	Training and Communication- Training and Awareness	A separate cultural heritage awareness induction will be delivered by a representative of the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation (CHMPs 16593 and 18496) or cultural heritage advisor (CHMP 16594) for all personnel who will be involved in ground disturbance works within the approved CHMP Activity Area	Induction of project personnel who will be involved in ground disturbance works.	The auditors sighted a copy of the WORM Plumpton to Wollert CHMPs 16593, 16594 and 18496 Cultural Heritage Induction prepared on behalf of APA VTS Australia (Operations) Pty Ltd. The training and induction register verifies personnel have been inducted in cultural heritage.	WORM Plumpton to Wollert CHMPs 16593, 16594 and 18496 Cultural Heritage Induction prepared on behalf of APA VTS Australia (Operations) Pty Ltd	Acceptable
10.1	Training and Communication- Training and Awareness	Specific awareness training (or toolbox talks) in the implementation of the CEMP and other management plans will be undertaken for relevant personnel.	Provide specific awareness training via toolbox talks or pre-starts	Toolbox talk template was sighted during the field audit. APA advised environmental SWMS and topic-specific talks occur on fortnightly basis. Auditors sighted the Environmental works SWMS and Fauna Catcher Spotter Activities SWMS. Copy of toolbox talk info sheets have been sighted for snake awareness and biosecurity.	Environmental works SWMS (18035-SWM-HSE-0075) Rev B dated 9/12/22 Fauna Catcher Spotter Activities SWMS (18035-SWM-HSE-0076) Rev 3 dated 9/12/22 Toolbox talk info sheets for snake awareness and biosecurity.	Acceptable
10.1	Training and Communication- Training and Awareness	Where required, job specific competency training will be undertaken prior to the mobilisation of personnel to the site. Records of project personnel's qualifications and training will be maintained as per Section 11.6.	Ensure that personnel are competent and record of appropriate qualifications are held.	Copy of certificate (SHLA01326) in reptile and venomous snake handling (22500VIC) attained on the 07/09/22 by the Spiecapag Environment Advisor has been sighted. The following documents have been sighted, verifying the fauna spotter catcher (Richard Swindells) has adequate experience/qualifications: - wildlife control licence (licence no. 14918164CX) exp: 30/06/23 - ACM30117 Certificate III in Animal Studies - letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue OFI: A training matrix would have been a clearer tool in identifying those who have undergone specific training (i.e., FSC).	Copy of certificate (SHLA01326) in reptile and venomous snake handling (22500VIC) Wildlife control licence (licence no. 14918164CX) exp: 30/06/23 ACM30117 Certificate III in Animal Studies Letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue	Acceptable
10.2	Training and Communication - Consultation	Regular meetings will be held between APA and the Principle Contractor. Environmental management will be an agenda item at these meetings.	Regular meetings between contractor and APA	Auditors sighted the Weekly Construction Meeting Action Tracker. It contains details regarding environment subjects and actions, target close-out, person responsible and comments. It also contains the results of discussions regarding internal audit, material outside the RoW, CH attendance and CHMP NCR.	Weekly Construction Meeting Action Tracker - excel spreadsheet.	Acceptable
10.3.1	Training and Communication - DEECA	In order to inform DEECA as the regulatory authority for environmental compliance under the Pipelines Act, APA will report to DEECA in line with the reporting schedule identified in Table 10.1: 1. Summary of key activities undertaken in the reporting period (including photos as relevant) and planned activities in the following reporting period. 2. Work status against planned schedule. 3. Summary of environmental incidents, complaints and non conformances identified in the performance monitoring. 4. Results of any audits and status of implementation of corrective actionsdentified in any corrective action plan.	Reporting in accordance with requirements of Table 10.1	Weekly Site Report 28 (week ending 12/02/23) & Report 29 (week ending 19/02/23) to DEECA have been sighted. Weekly reports included the requirements outlined in Table 10.1 (see column D). Weekly reports contain HSE stats, Construction Status, Approvals/Permits, Environmental Performance & photos. Email correspondence shows the APA environmental advisor sending DEECA the APA WORM PL006918 - Weekly construction report 28 - WE12/02/2023 on 13/02/23 which verifies the report was issued.	Weekly Site Reports 28 (week ending 12/02/23) & 29 (week ending 19/02/23). Email correspondence shows the APA environmental advisor sending DEECA the APA WORM PL006918 - Weekly construction report 28 - WE12/02/2023 on 13/02/23.	Acceptable
Assurance						
11.1.1	Assurance - Inspections and Monitoring	APA will assess the conformance of the activities to this CEMP and applicable statutory requirements. Verification assessments will be completed by the project HSE Advisor and include field observations, site inspections and environmental record reviews. The extent and frequency of verification assessments will be commensurate with risk and potential impact. As a minimum, assessments will occur weekly during construction.	Undertake verification assessments including field observations, site inspections and environmental record reviews.	Auditors have sighted several WORM Pipeline APA Weekly Environmental Inspections. These address flagged items & actions, noise and vibration, air quality, biodiversity, cultural heritage, contamination, ground movement, fuels and chemicals, waste, Fire, Hot Works and Emergency Preparedness, Hydrotesting and Reinstatement checks.	WORM Pipeline APA Weekly Environmental Inspections 18035-PL-HSE-ENVAUD001 (dated 26/10/22, 17/11/22, 12/12/22, 23/01/23 and 15/02/23)	Acceptable

11.1.1	Assurance - Inspections and Monitoring	Non-conformances identified during the verification assessments will be recorded, correction actions implemented (section 11.5), and reported in the weekly construction status report to DEECA	Identification of non-conformance and implementation of corrective actions	Weekly Site Report 29 (week ending 19/02/23) summarises environmental incidents (15/02/2023 – HDD mud release KP8.9- Drilling mud released into the HDD pad area and the paddock adjacent to the HDD pad area & 16/02/2023 - Fauna death – tiger snake during rock sieving). Spiecapag environmental incident report form (No.15) dated 16/02/23 at KP 5.6 has been sighted. The report notes that a Tiger Snake (dead) was shaken out of excavator bucket and the actions implemented were: - Enviro team notified of incident by excavator operator. - Fauna identified and collected by Fauna spotter catcher. - Fauna offered and taken to Victoria Museum per FMP (17/02/2023). Incident reports from APA (incident no. 514334) and Spiecapag (report No.014) have been sighted. The reports detail the incident that occurred on the 16/02/23 at Calder Hwy. the actions implemented were: - Drilling stopped immediately - frac was cleaned up immediately via vac truck - The incident was reported to Spiecapag Senior Engineer and Environmental Manager	Weekly Site Report 29 (week ending 19/02/23)	Acceptable
11.1.2	Assurance - Audits	Internal auditing of this EMP will commence in Q1 2023 and will be undertaken quarterly thereafter until pipeline installation is complete. The audits will be undertaken using the APA Environment Audit tool and focus on the risks identified in this CEMP.	Undertake internal environmental audits	APA informed the auditors that Internal Audit had not taken place at the time of this Audit (15/02/23). Subsequent to the field inspection, APA's internal audit, dated March 2023, was supplied. The audit uses the APA audit template and tracks 185 conditions from the APA CEMP and uses the same finding categories as this independent audit.	WORM Audit March 2023 (Excel spreadsheet)	Acceptable
11.1.2	Assurance - Audits	A timeframe for addressing audit actions will be agreed to by the Project Manager, and audit actions are to be reviewed by the Environment Advisor to ensure they have been adequately addressed and closed out.	Attribute a timeframe for all audit actions and manage until closed out	APA's internal audit, dated March 2023, was supplied, as listed above. Actions arising from the audit are entered into APA's online SafeGuard System with a date of entry and date required for close-out included, which was sighted by the Lead Auditor.	Safeguard screenshot	Acceptable
11.1.2	Assurance - Audits	Following an environmental audit, the CEMP will be reviewed, updated and re-issued to reflect any findings, including regulatory and organizational changes.	Review CEMP accordingly following environmental audit	At the time of the external audit (15th & 16th of February 2023), APA advised that the internal audit had not been completed and that the next revision of the CEMP is to include audit actions (if required). APA advised that the CEMP currently in effect is Rev 12 (at the time of the external audit, it was Rev 10).	This CEMP.	Acceptable
11.1.3	Assurance - External Audit	External audits will include: 1. Initial audit 2. Construction progress audit 3. Reinstatement completion audit 4. Close out audit The initial external audit will be conducted prior to the commencement of mainline construction to verify that all required environmental management plans and procedures are in place and fit for purpose. Reports on the audit will be publicly available on the project website 30 days after completion.	Engage external environmental auditor and undertake audit program.	The external audit was undertaken by the auditors on 15 & 16th February 2023 for the construction phase. The initial pre-construction audit was undertaken by the auditors on 28 September 2022.	This report.	Acceptable
11.2.1	Assurance - Contractor Assurance - Performance monitoring	The Contractor is required to develop and implement environmental monitoring programs consistent with the performance standards in this CEMP, and the requirements listed in Appendix D. The monitoring programs developed by the Contractor will be reviewed and approved by APA. Specific monitoring requirements for relevant environmental aspects and construction activities are outlined in Project's Monitoring Plan (18035-PL-HSE-0009).	Develop and implement an environmental monitoring program	Spiecapag environmental aspects register was sighted on 15 Feb 2023 and a digital copy was provided. The register contains water testing, soil sampling, dewatering permits, hydrostatic water, air quality monitor and native vegetation clearing (permitted) records. **OFI:** The auditors have not sighted the Project's Monitoring Plan (18035-PL-HSE-0009) and are unable to verify the correct environmental aspects are covered.	Spiecapag environmental aspects register (excel spreadsheet).	Opportunity for improvement

11.2.1	Assurance - Contractor Assurance - Performance monitoring	At a minimum, weekly verification inspections of the construction works will include: • Site access compliance (e.g. works contained within construction area boundaries and compliance with any landowner agreements) • Adherence to work permits • Adherence to Contractor's EMP, inclusive of: o Soil management and stockpiling o Sediment control o Dust and noise control o Waste management o Fauna and flora management (including weeds and pest management) o Cultural heritage o Air, noise and vibration monitoring o Surface water o Maintenance of controls (e.g. fencing, sediment and erosion controls etc.) Contractor weekly inspection reports will be provided to APA.	Undertake weekly verification inspections	WORM Pipeline APA Weekly Environmental Inspections contain the provison 'Adherence to Contractor's EMP' outlined in column C, **observation:** the weekly inspections do not contain specific checks regading adherence to work permits.	WORM Pipeline APA Weekly Environmental Inspection reports (18035-PL-HSE-ENVAUD001, dated 26/10/22, 17/11/22, 12/12/22, 23/01/23, 1/02/23 and 15/02/23) Environmental aspects register	Acceptable
11.2.2	Assurance - Contractor Assurance - Contractor Verification	The construction contractor will complete an internal assessment of their CEMP implementation at least monthly. The contractor will prepare and implement corrective actions to address non-conformances. The Contractor will provide APA with a monthly environmental performance report, at the end of each calendar month, that includes the results of monitoring, verification inspections, non-conformances with this CEMP, non-compliances with relevant statutory requirements, environmental incidents and corrective actions.	Provide APA with a monthly report including summary of inspections, non-conformances, non-compliances, incidents and corrective actions.	Spiecapag Monthly Report 005 – 1st to 31st January 2023 and Monthly Report 006 – 1st to 28th February 2023 have been sighted and includes the requirements in column C.	Monthly Report 005 – 1st to 31st January 2023 Monthly Report 006 – 1st to 28th February 2023	Acceptable
11.3.1	Assurance - Environmental Incidents	All incidents will be investigated in accordance with APA's Incident Investigation and Analysis Procedure (APA HSE GP 07.02)	Investigate incident in accordance with APA procedure	Western Outer Ring Main Incident Report – Environment (Safeguard+ Incident No. 510004) dated 27/01/2023 details an incident involving spoil placed outside approved construction area and corrective actions. The incident was investigated in accordance with APA's Incident Investigation and Analysis Procedure. **OFI**: No follow up supporting documents were sighted by the auditors, therefore they were unable to verify that APA reviewed and endorsed the investigation and outcome.	Western Outer Ring Main Incident Report – Environment (Safeguard+ Incident No. 510004) APA's Incident Investigation and Analysis Procedure (APA HSE GP 07.02)	Acceptable
11.3.1	Assurance - Environmental Incidents	A summary of all environmental incidents will be included in the weekly Construction Status report to DEECA	Include all incident reporting to DEECA	Weekly Site Report 29 (week ending 19/02/23) contains the following environmental incident summaries: - 15/02/2023 – HDD mud release KP8.9 - Drilling mud released into the HDD pad area and the paddock adjacent to the HDD pad area. - 16/02/2023 - Fauna death – tiger snake during rock sieving.	Weekly Site Report 29 (week ending 19/02/23)	Acceptable
11.3.2	Assurance - Environmental Incident Reporting	APA will notify the Minister for Energy (or his/her delegate) and Energy Safe Victoria of all reportable environmental incidents arising out of a pipeline operation. Reportable environmental incidents are those that: • cause substantial damage to the environment; or • have significant potential impact on the environment. Environmental incidents include, but are not limited to: - Spills to a watercourse, including drains as defined under the Water Act 1989 - Loss of hydrocarbons or chemicals greater than 20 L in volume to land - Spills or releases, which have moved offsite and has a negative impact - Unauthorised removal or destruction of native vegetation - Death or injury of state and nationally listed threatened flora or fauna caused by the construction activities (excluding off-site incidents) - Unauthorised impact to cultural heritage, refer to CHMP 16593, CHMP 16594 and CHMP 18496 - Interference with any previously undetected sites of cultural significance without obtaining the appropriate approval - Fires causing damage to property outside the construction area - Release of drilling fluids to land greater than 20L - Loss of any radioactive equipment, source or material	Notification of reportable incidents in accordance with criteria in S11.3.2	APA advised that the requirement to report incidents to ESV was removed in Rev 9 of the CEMP, therefore it is no longer a requirement as this audit report is evaluating Rev 10 of the CEMP. The corrective action register and incident register contains several reportable incidents, below are some examples where DELWP were notified: - Mud release into the HDD pad area and the adjacent paddock at KP 8.9. Auditors sighted the email dated 15/02/23 notifying Pipeline Regulation (DELWP) of a reportable environmental incident. Obs:This incident is not within the corrective actions register but is within the incident register. - Fauna death dated 4/11/22 at KP 8.5. Email dated 4/11/22 from the APA Acting Access and Approvals Manager SE Australia notifying Pipeline Regulation (DELWP) of the fauna death that occurred at KP 8.5 on 4/11/22 has been sighted. Observation: APA advised that the following incident was not reportable: Delineation from CH management plan dated 8/11/22 KP 45. However, in both the corrective actions register and incident register it was noted as a 'reportable incident'.	Copy of email sent from the APA Acting Manager Access and Approvals to the Pipeline Regulation (DELWP) on the 15/02/23. Copy of email sent from the APA Acting Manager Access and Approvals to the Pipeline Regulation (DELWP) on the 4/11/22. Copy of corrective actions register Copy of incident register	Acceptable
11.3.3	Assurance - Pollution events and notifiable contamination	Pollution incidents will be reported to the EPA by calling 1300 EPA VIC (1300 372 842). In addition to the above, Section 40 of the EP Act requires "notifiable contamination" to be reported to the EPA as soon as practicable.	Reporting of pollution incidents to the EPA using required verbal and written protocols.	Two EPA notifiable incident forms have been sighted for escape of drilling mud at Jacksons Creek.	EPA Notifiable incident form, ref ID 00002322, 13 April 2023 EPA Notifiable incident form, ref ID 00002325, 16 April 2023	Acceptable

11.3.3	Assurance - Pollution events and notifiable contamination	Section 31 of the EP Act 2017 requires the restoration of harm caused by an incident. The area must be restored to its original state so far as is reasonably practicable.	Restoration of affected areas subject to a pollution incident	APA advised two spills (one <20L and one >20L) had occurred at the time of the audit. Environmental incident report form dated 24/10/2022 for a hydraulic oil spill of approximately 11.6 L at KP 46 within the RoW (non-reportable) details the actions implemented: 1. Contaminated soil collected to the full extent of contamination for safe disposal 2. Incident register updated 3. Corrective action register updated 4. Waste disposal register updated by adding contaminated soil disposal tab (waste records will be updated upon receipt of safe disposal certificate) 5. Emergency contact details provided in online construction package 6. Spades deployed within spill kits 7. Spill kit register updated to reflect spill kit being used 8. Spill response toolbox talk undertaken Environmental incident report form dated 9/2/23 for an Environmental Spill of approximately 20L of generator fuel at KP 10.86 (reportable) details the actions implemented: Two 15L mobile spill kits from Morefield site office immediately deployed to contain spill, Spill contained with matting, small booms and saw dust, Generator fuel line replaced, Incident reported to Environmental Team, Contaminated soil and materials stockpiled in bulk bag and transported to Essendon Laydown and disposed of in hydrocarbon bin, Spill kits replaced, Disposal ongoing.	SCA Environmental incident report form dated 24/10/22 SCA Environmental incident report form dated 9/2/23	Acceptable
11.3.4	Assurance - Other reportable incidents	Incidents will also be reported to other statutory authorities as required by legislation and conditions of statutory approvals. This includes, as minimum: • Notifications to the Registered Aboriginal Party and Aboriginal Victoria, if a potential Aboriginal site or artefact is identified • Notification to Heritage Victoria and DEECA if a heritage artefact is discovered	Appropriate notification if item of aboriginal cultural heritage is identified or heritage item is identified.	Auditors sighted email from Spiecapag Environmental Advisor dated 24/01/23 notifying Biosis that an artefact was found at KP 31.56. Email states a 10x10 m exclusion zone has been established around the site and asks when a Heritage Advisor is available to come and collect the artifact. Biosis responds with details regarding collection on the same day (24/01/23). Email from the Senior Heritage Consultant at Biosis dated 18/05/23 confirms the artefact was identified through the Elder compliance inspections as split quartz flake with two pieces, with breakage. Biosos noted that the artefact record identities will be included in an updated Aboriginal place registration(s) on the Victorian Aboriginal Heritage Register (VAHR) as part of reporting.	Copy of email correspondence between Spiecapag Environment Advisor and Project Archaeologist at Biosis	Acceptable
11.3.5	Assurance - Contacts	A current listing of key project contacts, regulatory agencies and emergency services details will be kept in a prominent location in the site office(s) for reporting of incidents and emergency situations. Similarly, the Contractor will have key contacts and notification processes in their site offices.	Maintain list of project contacts, regulatory agencies and emergency services in prominent location in site offices. Contractor key contact /notification process in site offices.	Time constraints during the field audit meant that the auditors did not get the opportunity to examine the site noticeboards at the various active HDD sites or Essendon site office. However, APA was able to provide the auditors with a list of key project contacts that it advises is available on the project SharePoint site that key project personnel have access to.		Acceptable
11.3.5	Assurance - Contacts	Contractor incidents will be reported to APA in accordance with APA prescribed methods and timelines for reporting of incidents.	Contractor to report incidents within prescribed timeline in requested format	Outside of scope.		Not applicable
11.4	Assurance - Complaints procedure	Project-related complaints will be recorded in APA's enquiries/complaints app (Field Maps) and further investigation will be undertaken in line with APA's Complaints Protocol.	Manage enquiries / complaints	The auditors sighted the a copy of complaints register. The last complaint is dated 11/5/23. The register contains date complaint was raised, who raised the complaint, description of the complaint, Rectification Measures Implemented, Preventative Measures Implemented and close out personnel and date. Observation: Auditors did not receive any records of further investigations (if any) and therefore, could not determine if the investigation was done in accordance with the APA's Complaints Protocol.	Complaints register	Acceptable
11.5	Assurance - Corrective Actions	Where corrective or preventative action is required based on audits, verification assessments, monitoring, incident investigations or work site inspections, these actions will be documented in Safeguard+.	Manage corrective or preventative actions in Safeguard.	Safeguard screenshot provided (APA system) describing the mud spill that occurred on 15/02/23 has been sighted and lists the immediate actions. **Observation**: The corrective actions register does not contain this incident, however, the incident register does.	Safeguard screenshot	Acceptable
11.6	Assurance - Records	A copy of this CEMP and any relevant approvals/permits obtained for the Project will be available, either in hardcopy or electronic form, at the site office(s) for the duration of construction and rehabilitation works.	Maintain copy of CEMP V10 plus approvals & permits at site offices.	Auditors sighted CEMP V10 at the Essendon site office and noted its availability on the project SharePoint site.		Acceptable

11.6	Assurance - Records	Specific records relating to the systems, practices and procedures adopted to achieve compliance with the CEMP, as well as quantitative records of emissions and waste discharges will be maintained.	Maintain records in accordance with S11.6: - Induction records - Daily inspection records, records of environmental monitoring, details of all reportable and non-reportable environmental incidents (including emergency situations) and notifications and relevant regulatory reporting (including information required to support reporting in accordance with section 10.3) - Complaints and corrective action registers - Records of meetings and interaction with external parties (e.g. regulatory authorities and owners/occupiers of land) - Implementation of the emergency response procedures, emergency response testing, compliance with the emergency response plan and in the case of an emergency situation, effectiveness of the emergency response plan in eliminating as far as reasonably practicable any harm to the environment - Records of Cultural Heritage unexpected finds - Permitted clearing of native vegetation records - Vehicle and machinery inspection and maintenance records - EPA waste transport certificates for the transport of contaminated soil, solid wastes, spent absorbent materials, oils and lubricants and sullage and other wastes - Landfill / receiving facility disposal acceptance approvals - Letter / Certification of imported sands and crushed rock from approved natural source - Agreements entered into with landowners/occupiers - Register and copies of all safety data sheets - Register of spill containment kits.	All records outlined in Colum D have been sighted apart from the following: - EPA waste transport certificates for the transport of contaminated soil, solid wastes, spent absorbent materials, oils and lubricants and sullage and other wastes - Landfill / receiving facility disposal acceptance approvals		Opportunity for improvement
11.7	Assurance - Review	The need for changes to the CEMP will be reviewed and, if required, the CEMP updated in response to proposed or actual events.	Update CEMP as/when required	At the time of the audit, the CEMP was at Revision 10, whereas during the pre-construction audit, it was Revision 7. This indicates that it is actively being updated.		Acceptable
11.7	Assurance - Review	Contractor plans and documentation will be prepared and approved by APA, and statutory approval decision makers where applicable, prior to the relevant works commencing, with changes also requiring APA approval.	Contractor plans and docs to be reviewed and accepted by APA and statutory approval decision makers where applicable.	Spiecapag CEMP (18035-PL-HSE-0014) had undergone two revisions (A&B) before being accepted by APA (Rev C, dated 27/09/22) with the condition that sub-plans/site specific plans need to be accepted prior to conducting certain activities. The following sub-plans and SSEMPs were also prepared by Spiecapag and have been approved by APA: - Tree MP - Merri Creek SSEMP - Deep Creek SSEMP - Jacksons Creek SSEMP - Conservation Area 28B SSEMP - Minor Waterway Crossing Procedure	Spiecapag CEMP Tree MP Merri Creek SSEMP Deep Creek SSEMP Jacksons Creek SSEMP Conservation Area 28B SSEMP Minor Waterway Crossing Procedure	Acceptable
	Appendix D	Management plans must be developed, approved and implemented as required in the table below consistent with the requirements of permits, approvals (including relevant specialist studies) legislation, regulations and applicable guidelines and standards	Preparation of management plans in accordance with the Table in Appendix D	All of the plans within the Table in Appendix D of this plan have been prepared and reviewed. This was evident within the initial audit conducted in September 2022, where the auditors sighted many of the plans in their draft stages. Implementation of these plans are captured within this audit report.		Acceptable
A4	Appendix F.1	Construction drawings must clearly delineate the construction area, access points and sensitive areas (e.g. native vegetation) in or adjacent to the construction area. A Site plan must form part of the project induction and be available to site supervisors at all times during construction.		The following provide an indication that construction drawings clearly delineate the construction site and so forth: - Route plan for KP 43 (Merri Creek) shows the decreased RoW to 25 m as an environmental constraint. - Route plan for KP 10 (striped legless lizard habitat) also shows the decreased RoW to 25 m as an environmental constraint. - Route plan for KP 8 & 9 (Crosses over the Bendigo Line Railway and the Calder Freeway) shows decreased RoW to 25 m, 18 m and 10 m as environmental constraints.	Route Plans - KP 43, 10, 8 & 9.	Acceptable

A5	Appendix F.1	Comply with construction drawings.		The auditors visited numerous sites along the construction RoW, including KP 43 & KP 10 and it appeared that construction activities were consistent with route plans.		Acceptable
A6	Appendix F.1	Provide evidence to the satisfaction of the DEECA of the following plan, prior to the works that are relevant to the plans listed in Appendix D		The auditors have not sighted evidence to satisfy this commitment.	Appendix D of the CEMP	Opportunity for improvement
A7	Appendix F.1	Provide current property management plan prior to the use of mechanical equipment on the relevant private property.		The auditors did not receive PMPs or sample consultation records regarding the use of mechanical equipment on relevant private property.		Opportunity for improvement
NOISE & VIBRATION						
F2.1	Environment Management Measures - Noise and Vibration NV1	Manage construction noise and vibration in accordance with Chapter 4 (Noise and vibration) of EPA Publication 1834 Civil Construction, building and demolition guide. Prepare and implement a Construction Noise and Vibration Management Plan (CNVMP) that includes the following measures to eliminate or minimise the emission of noise to the extent reasonably practicable: - Undertake preparatory work offsite where there is low potential for risks of harm impacting people. - Limit noise caused by people onsite, including the use of amplified systems such as radios. - Use the lowest-noise and vibration work practices and equipment that meet the requirements of the job. - Use broadband reversing alarms on construction vehicles and machinery in preference to 'beeper' reversing alarms. The construction area will be planned to minimise the need for reversing of vehicles. - Turn off equipment and vehicles when not being used. - Take care not to drop spoil and construction materials that cause peak noise events. - Ensure equipment is operated and maintained in accordance with manufacturer's requirements. - Ensuring good working condition of mufflers and loose parts that may rattle are secured. -Limit works to the 'normal working hours' (as defined in EPA Publication 1834) as far as reasonably practicable. - Minimise use of loud equipment, generation of unnecessary noise and vibration, and the movement of vehicles on the construction area as far as reasonably practicable. - Outline designated vehicle routes, parking locations and delivery hours to minimise risks of harm from noise on sensitive receptors. -Adopting engineering noise controls at the source (e.g. silencer, mufflers, enclosures) by all reasonably practicable means using current technology. -Selection of quieter equipment. - Installation of onsite barriers such as hoardings or temporary screens at any specific locations, where necessary to provide a noise barrier between particularly noisy construction works and nearby sensitive receptors. -Limit the duration of sensitive receptors' exposure to continuous noise from very noisy activities (and provide respite periods to affected persons). Periodically review sensitive receptor locations to identify any new receptors. -To the extent reasonably practicable, ensure noise emissions do not exceed the construction noise and vibration levels as identified in EMM NV10.	Reflect Chapter 4 in Noise and Vibration Management Plan	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015) reviewed and Accepted (code 1) by APA Rev B dated 8/11/22 has been sighted and contains all measures required of the commitment. OFI: Environmental aspects register contains a section for noise, however, the section records out of hours work, not monitoring results. An updated Environmental aspects register has been supplied and also does not contain noise monitoring. However, noise monitoring sheets have been sighted for 4/05/23 and 5/05/23 at two locations at Fraser Rise. The monitoring was conducted at 15-minute intervals (with a hand held sound level meter).	Construction Noise and Vibration Management Plan	Acceptable
	Environment Management Measures - Noise and Vibration NV2	The CNVMP must include a detailed noise assessment report, to be prepared by a suitably qualified acoustic consultant. The acoustic report must respond fully to the requirements of the Environment Protection Act 2017, including the GED and Environment Protection Regulations 2021, and include: -Details of specific construction activities once schedules are known, including the number and type of noise-producing plant working in each area, their respective sound power levels and the duration of activities in each area - Nomination of specific noise mitigation measures, including a description of the level of attenuation that they would provide, either by stating manufacturer data, or by undertaking measurements of the proposed mitigation measures prior to their implementation at site - Confirmation that all reasonably practicable noise mitigation controls have been implemented and that GED has been met - Assessment of the residual noise levels, in the context of criteria listed in NV10, once all reasonable and practicable noise mitigation controls have been implemented, at affected noise-sensitive receivers and nearby natural areas, in accordance with the Noise Protocol and Environmental Reference Standard respectively.	Prepare and implement a Construction Noise and Vibration Management Plan (CNVMP)	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015) reviewed and accepted (code 1) by APA is in place. The Construction Noise and Vibration Management Plan was prepared by qualified acoustic engineers (Arup, Association of Australian Acoustical Consultants and the Australian Acoustical Society). Implementation of the plan has been verified by checking the weekly inspection reports, which contain checks for noise and vibration. No commitments have been breached in the reports provided.	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015, Rev B, 8 Nov 2022) Weekly inspection reports	Acceptable

F2.1	Environment Management Measures - Noise and Vibration NV3	Develop a detailed Blast Management Plan in accordance with AS 2187.2 – 2006 *Explosives- storage and use* and other relevant documents to confirm blasting impacts and implement any further management measures required. Blasting is to be undertaken to the satisfaction of a qualified shot firer.	Prepare and implement a Blast Management Plan	Blast Management Plan (18035-PL-CN-0007) Rev A dated 10/10/22 has been witnessed during the pre-construction audit. APA advised that the plan did not aquire a code 1 review and acceptance due to deciding that no blasting would take place.		Acceptable
F2.1	Environment Management Measures - Noise and Vibration NV4	As far as reasonably practicable, increase the distance between a sensitive receptor and the noise/vibration source to reduce impacts. This can be achieved through strategic placement of stationary equipment (e.g. generators used for specific works) within the construction area to maximise the distance between source and receptor.	Acknowledge sensitive receptors and position noise generating equipment accordingly.	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015) reviewed and Accepted (code 1) by APA is in place. At the time of the field audit, the complaints register did not contain any records of noise or vibration related complaints. However, one complaint did occur on the 24/04/23 from a resident that is adjacent to construction. Consultation with sensitive receptor by Community Engagement Rep and noise monitoring was listed as the Rectification Measures Implemented and a Noise assessment has been undertaken and no more works planned to occur OOH was listed as Preventative Measures Implemented. The complaint was closed on 11/05/23.	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015, Rev B, 8 Nov 2022) Complaints register	Acceptable
F2.1	Environment Management Measures - Noise and Vibration NV5	As far as reasonably practicable, limit works to the 'normal working hours' (as defined in EPA Publication 1834). Identify activities required to be undertaken outside of normal working hours. The Construction Noise and Vibration Plan must include a clear rationale for defining works as 'low-noise', 'managed impact', or 'unavoidable' (as defined in EPA Publication 1834) and response strategies to minimise the risk of harm from noise emissions as far as reasonably practicable having regard to EPA Publication 1834 "Civil construction, building and demolition guide". Activities that are anticipated to occur outside normal working hours are limited to horizontal drilling and hydrostatic testing due to continuous nature of these activities. These specific activities will be treated as "managed impact works" as per the EPA publication 1834. For these activities, the pipeline contractor will prepare a Noise and Vibration Management Plan, which will be verified by an independent acoustic consultant or independent Health Safety and Environment (HSE) specialist, or other person with skills and expertise in risk/safety assessment	Confine noise generating activities to standard working hours. Ensure any noise generating work undertaken outside of standard hours is within managed impact or unavoidable criteria.	CNVMP outlines that normal working hours will be adopted during construction (7am-6pm Mon-Fri and 8am-1pm on Saturdays). The HDD Out of Hours Works (18035-PP-L-064) discusses noise and vibration management to be undertaken during night works. The only real way to determine whether this commitment has been met is to review complaints. At the time of the field audit, the complaints register did not contain any records of noise or vibration. However, one complaint did occur on the 24/04/23 (see NV4 for details).	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015, Rev B, 8 Nov 2022) Complaints register The HDD Out of Hours Works (18035-PP-L-064)	Acceptable
F2.1	Environment Management Measures - Noise and Vibration NV6	Where the residual noise and vibration impact (after mitigation measures are being implemented) exceeds the recommended construction noise and vibration criteria or construction works are planned close to the sensitive receptors, notify residents in advance about upcoming construction works. Send notification letters to residents of noise affected dwellings prior to the commencement of works which include information on: - Date and time of the noise intensive works -Expected durations of the noisiest activities - Use and provision of individual protective measures (for short duration impacts on a case-by-case basis). Implement a complaints management register that documents: - Name of persons receiving complaint - Name of person making the complaint - Date and time of complaint - Nature of the complaint -Actions taken to rectify the issue - Actions to minimise risk of repeated occurrence - Name of person responsible for undertaking the required actions - Communication of response to the complaint Implement a complaint system that includes the following measures: - Establish a community liaison phone number and permanent project contact number so that noise related complaints can be received and addressed in a timely manner -Determine whether any unusual activities were taking place at the time of the complaint that may have generated higher noise levels than usual and whether they may be attributed to the construction activities - Implement additional mitigation measures where required and reasonably practicable.	Proactively manage sensitive receptor engagement in advance of noise generating works	The CNVMP contains the approach to engagement with sensitive receptors during standard hours and outside standard hours. Sample of communication records show residents surrounding Deep Creek were informed of upcoming night works that had the potential to reach 30 dBs> (via dock knocking and letter dropping) on the 3/03/23. The records do not flag any major issues and note that those who were present at the time of the door knocking did not have any concerns. At the time of the field audit, the complaints register did not contain any records of noise or vibration. However, one complaint did occur on the 24/04/23 NV4 for details.	Construction Noise and Vibration Management Plan (18035-PL-HSE-0015, Rev B, 8 Nov 2022) Complaints register Sample of communication records (excel spreadsheet).	Acceptable
F2.1	Environment Management Measures - Noise and Vibration NV7	Where the residual impact is predicted to exceed the recommended noise or vibration criterion for an extended period (after other mitigation measures have been implemented), discuss information on the risk of harm with affected residents. Depending on the circumstances, off-site measures to minimise risk of harm from noise must be considered including alternative temporary accommodation or other respite option.	Proactively manage sensitive receptor engagement in advance of long lasting noise generating works	Sample of communication records show residents surrounding Deep Creek were informed of upcoming night works that had the potential to reach 30dBs> (via dock knocking and letter dropping) on the 3/03/23. The records do not flag any major issues and note that those who were present at the time of the door knocking did not have any concerns.	Sample of communication records (excel spreadsheet).	Acceptable

F2.1	Environment Management Measures - Noise and Vibration NV8	Where required, condition/dilapidation surveys will be offered to owners of buildings where high blast charges are required and the detailed blast study and impact management plan identifies possible impact to buildings.	Include consideration of impact to buildings in Blast management plan. Undertake condition/dilapidation surveys in advance of high blast charges.	The auditors were advised by the APA Environmental Advisor that no blasting had taken place up to the time of the audit and that no blasting will be taking place throughout the entire project.		Not applicable
F2.1	Environment Management Measures - Noise and Vibration NV9	Liaise with the MWC Bald Hill to Yan Yean pipeline and Major Road Projects Victoria Sunbury Road upgrade project teams to assess cumulative construction noise impacts in accordance with Regulation 119 of the EP Regulations. If the Project and MWC construction works are scheduled simultaneously, review the CNVMP for this section of the Project to identify if additional noise mitigation measures may be necessary in order to minimise the risk of harm from noise emissions so far as reasonably practicable.	Liaise with adjacent projects to ensure management of cumulative noise generation	Auditors did not sight evidence of consultation with MWC Bald Hill to Yan Yean pipeline and Major Road Projects Victoria Sunbury Road upgrade project teams.		Opportunity for improvement
F2.1	Environment Management Measures - Noise and Vibration NV10	Minimise the risk of harm from noise emissions from construction noise in accordance with the CNVMP by utilising the mitigation measures, where reasonably practicable, listed in EMM NV1. Ensure the noise levels (see NV10 in the CEMP) are not exceeded as far as reasonably practicable. Implement management measures if vibration from construction is predicted to exceed the standards for structural damage as identified in NV10 in the CEMP. Implement management measures if vibration from construction is predicted to exceed the standards for structural damage to existing underground pipelines (see NV10 in the CEMP). Implement management measures if vibration from construction exceeds the human perception of 0.3 mm/s at sensitive receptors.	Undertake construction activities within acceptable noise criteria limits	The CNVMP identifies sensitive receptors. At the time of the field audit, the complaints register did not contain any records of noise or vibration. Observation: Environmental aspects register contains a section for noise, however, the section records out-of-hours work, not monitoring results. An updated Environmental aspects register has been supplied and also does not contain noise monitoring.		Not applicable
AIR QUALITY						
F2.2	Environment Management Measures - Air Quality AQ1	<u>Construction dust management</u> At the commencement of clear and grade work on each property, review sensitive receptor locations to identify any new receptors, having particular regard to new residential development. Implement management and control measures during construction activities to minimise dust including: - Water carts to be used on unsealed work areas as required - Crushed rock to be placed on existing permanent unsealed access tracks where agreed with relevant stakeholders – especially in areas where housing abuts, or may abut by the time construction occurs, the construction area. - Water spray units to be used, where required, on soil stockpiles and during the loading and unloading of dust generating materials, i.e. Soil/sand/fill and aggregates. - Vehicle loads to be covered when carrying dust (or litter) generating material. - Vehicle speed within the construction area must be restricted to 30 km/hr. - Dust suppression activities must consider weather patterns, ground cover, ground conditions e.g. type and moisture content of soil present, and type of activities being conducted as well as proximity to sensitive receptor locations. - Undertake a sufficient level of compaction on stockpile surfaces to minimise dust. If all available methods of dust stabilisation fail to suppress dust and dust emissions are evident beyond the construction area boundary at identified sensitive receptor locations (as identified by real-time reactive monitoring, as required), the contractor must temporarily modify or suspend dust generating activities until conditions subside. Controls must be implemented if dust is observed to be causing a hazard (such as a wind barrier where directly impacted residences are located immediately adjacent to the construction area). If dust levels cannot be contained works must be modified or stopped until dust hazard is reduced to a manageable level, such that it can be controlled using the standard measures. <u>Construction dust management monitoring</u> Dust monitoring for adaptive management must be undertaken during construction where isolated rural residences or rows of housing that abut the construction area are within the impact 'footprint' distances identified in Table 23 of Technical Report G Air Quality. Instruments must be consistent with EPA 1961 and relating to taking measures to minimise emissions as far as reasonably practicable. Dust management monitoring must be deployed for each workday subject to where the daily work front is in relation to the specific areas where sensitive receptors are located.	Ensure all sensitive receptors are identified prior to clear and grade commencement.	Sensitive receptor locations are marked in the WORM Environmental Line List. This is Appendix E to the APA CEMP. The auditors sighted a dust monitoring sign along the RoW fencing at KP 10.5 – minor waterway crossing (unnamed tributary of Jackson's Creek), but not a dust monitor itself (the RoW was already cleared and pipe strung but not laid). The complaints register notes one dust complaint at Parkland Crescent on 23 Feb 2023. The register notes that a water cart and dust monitor was mobilised to site, and soil stockpiles were compacted. SCA provided daily inspection reports where dust monitoring actions were in place/flagged: 14/03/23 at KP 28-29 - dust suppression had been implemented by water cart at mickleham rd north access at 1pm. 1/02/23 at KP 10.5 (Calder Hwy) - Dust monitor established 9/01/23 at KP 25 - dust was not being managed effectively, environmental advisor advised adding dust management to prestart and dust suppression with water carts. **<u>OFI:</u>** The environmental aspects register contains a dust monitoring tab, however, it is unclear what date and time the results were attained and the method of which the monitoring was done (visual inspection?). However, noise monitoring sheets have been sighted for 4/05/23 and 5/05/23 at two locations at Fraser Rise. The monitoring was conducted at 15-minute intervals (with a hand held sound level meter). OFI: Dust monitoring report from the locations identified in Table 23 from Report G of the EES and evidence that instruments meet EPA 1961 requirements. <SIENA - WHAT DOES THIS MEAN?>	WORM Environmental Line List Appendix E to the CEMP (18035-PL-HSE-004 CEMP, Rev 10, dated 10/01/23) Daily inspection checklists	Opportunity for improvement

F2.2	Environment Management Measures - Air Quality AQ3	<u>Odorous soils management</u> In the event that odorous soils (as a result of contamination or acid sulfate soils) are uncovered during construction, standard soil management measures must be undertaken, as outlined in EMM C1 (Implement spoil management measures).		The corrective actions register and incident register do not contain any occurrences of odorous soils (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	Corrective Actions Register Incident register	Not applicable
BIODIVERSITY						
F2.3	Environment Management Measures - Biodiversity B1(i)	<u>Vegetation management (construction)</u> Confine all vegetation clearing works to the defined construction area. Clearly demarcate all buffer zones, no-go zones, tree protection zones, and the boundary of the construction area prior to relevant works commencing. Install and maintain temporary fencing along the construction footprint boundary in areas adjacent to sensitive environmental values. The Matted Flax Lily and Tough Scurf-Pea would be protected by temporary fencing (e.g. star pickets and wire fencing or galvanized temporary construction fencing). See additional measures below specific for works within conservation areas of the MSA (i.e. KP 43 and 49). Clearly demarcate and identify on site all environmental features to be retained within or directly adjacent to the construction area, prior to relevant works commencing. Any necessary trimming of tree branches located on the edge of the construction area and, overhanging into construction areas must be carried out by a qualified arborist. Develop and implement a Tree Management Plan (B23).	Demarcate construction corridor. All vegetation clearing works to be undertaken within the construction corridor. Fence areas adjacent to sensitive environmental areas Trees to be trimmed by a qualified arborist Prepare a Tree Management Plan	Tree Management Plan (18035-PL-HSE-0016) with code 1 APA approval has been sighted. The WORM Environmental Line List lists all vegetation protection zones. All sites visited by the auditors had clearly defined RoWs with no visible vegetation cleared outside the RoW. Sites visited by the auditors that contained sensitive areas adjacent to the RoW had fencing in place. Table 7 of the arborist report details high retention value trees to be retained during construction, including those that need to be trimmed.	Tree Management Plan (18035-PL-HSE-0016, Rev 1, 27 Oct 2022).	Acceptable
F2.3	Environment Management Measures - Biodiversity B1(ii)	Site Specific Management Plans to be prepared for Conservation Areas (refer to the ELL in Appendix E), including the following specific measures: - Temporary fencing must be installed and maintained along the boundary of the approved construction footprint within Conservation Areas. -The locations for the temporary fencing must be identified on site by a licensed land surveyor and recorded, with the recorded survey marks to be provided to DEECA. -The temporary fencing is to be star-picket and wire fencing, with pickets driven up to 300mm depth at 5 m intervals, continuous flagging and 'No Go Zone' signage at intervals not exceeding 30m. - Construction works, vehicle traffic and placement or storage of structures or materials are not permitted beyond the approved construction area within the Conservation Area. Biosecurity: o Complete weed and seed inspections of all vehicles and plants entering the Conservation Areas. Inspection records must remain with the vehicle at all times when working in Conservation Areas. o Set up and maintain vehicle washdown locations adjacent to (but outside of) Conservation Areas to allow for washdown of vehicles as required following inspections. Vehicle washdown locations must include suitable bunding and waste management practices.		Example SCA weed hygiene records dated 21/11/22, 18/1/23 and 27/3/23 have been sighted. Inspections were conducted by the plant manager. Auditors witnessed a vehicle washdown prior to entrance at Merri Creek (KP 42.0) (commitment within the Merri Creek SSEMP), and the on-site register filled in. **<u>Observation:</u>** No vehicle washdown location was sighted at Conservation Area 28B. Merri Creek and Conservation Area 28B SSEMPs have been sighted and contain the measures required of the commitment.	Visual observations Conservation Area 34A (Merri Creek) biosecurity sign-in register Example SCA weed hygiene records dated 21/11/22, 18/1/23 and 27/3/23 Merri Creek SSEMP Conservation Area 28B SSEMP	Acceptable
F2.3	Environment Management Measures - Biodiversity B2(i)	<u>Pest plant/animal/pathogen control (construction)</u> Implement the following measures during construction to manage biosecurity risks and address Catchment and Land Protection Act 1994 (CaLP Act) obligations: • Locate CaLP Act listed weeds in the construction area and assess the risk of additional spread prior to relocating topsoil, implement measures to manage this risk during clear and grade, and reinstatement. • All vehicles and construction equipment, including third parties, must be free of weeds, seeds and soil material prior to arrival to the construction area, consistent with A Guide for Machinery Hygiene for Civil Construction (Civil Contractor's Federation, 2011). • Weed and seed inspections must be completed for all vehicles and plant on arrival, with a record of the inspection to remain with the vehicle. • During the clear and grade phase, ensure that vehicles and plant traversing between land parcels are managed to minimise the risk of additional spread of weeds as far as reasonably possible, and are free of soil clumps and sods prior to entry and exit from the construction area. • Evaluate disturbed areas post-construction and implement remedial measures as required within a reasonable timeframe. • Manage waste in accordance with EMM C7 • Apply specific measures for works in Conservation Areas (refer to the ELL in Appendix E) as per Site Specific Management Plans (EMM B1(ii)).	Manage Pest Plant, Animal and Pathogen risk effectively	Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains the obligations outlined in column C. Example SCA weed hygiene records dated 21/11/22, 18/1/23 and 27/3/23 have been sighted. Inspections were conducted by the plant manager. Auditors witnessed a vehicle washdown prior to entrance at Merri Creek. During the field inspection, there was no visual evidence of weed outbreaks along the construction RoW or immediately adjacent to it.	SCA weed hygiene record Spiecapag CEMP Example SCA weed hygiene records dated 21/11/22, 18/1/23 and 27/3/23	Acceptable

F2.3	Environment Management Measures - Biodiversity B2(ii)	<u>Pathogen control – Chytrid fungus</u> • All vehicles and plant undertaking construction works directly in the watercourse (Merri Creek) must be cleaned, free of soil sods and sprayed with an appropriate disinfectant prior to entrance of each waterway and on exit if working between multiple waterways (excluding vehicles and plant using the constructed access route). • Manage Chytrid Fungus during fauna handling in accordance with the Fauna Management Plan.	Effectively manage risk of Chytrid fungus spread	Biosecurity washdown at Merri Creek (KP42) was sighted by auditors - clearly labelled and flagged. Disinfectant was available at the site, along with a register for signing. Weed and seed register for personnel and vehicles sighted at biosecurity washdown at Merri Creek. SCA advised no fungus has been recorded at Merri Creek.		Acceptable
F2.3	Environment Management Measures - Biodiversity B2(iii)	<u>Pathogen control – *Phytophthora*</u> If working in any area where dieback is identified, the following measures will be implemented on exit from the area: - If conditions are dry, use dry cleaning methods (e.g. air blower & brushes) to remove soil from tools, plant equipment and clothing, including boots. (Dust and grime on vehicles have a low risk of spreading dieback.) - Avoid using water wash-downs in dieback-affected areas where possible. - If a water based washdown is required in a dieback area, manually remove soil / mud prior to using water. - Contain any mud and do not allow run off to enter bushland. - Collect removed soil and mud into buckets or bags for off-site disposal. - Do not drive through runoff water or cleandown area after cleaning. - Apply a disinfectant following removal of soil. Disinfectants include: – Methylated spirits: 70% spirits to 30% water; – Sodium hypochlorite (pool chlorine): 6mL of sodium hypochlorite to 10L of water; – Household bleach: 1 part bleach to 4 parts water. – Commercial products such as Phytoclean. Follow label directions.	Manage phytophthora where identified	During the field inspection, there was no visual evidence of phytophthora outbreaks along the construction RoW or immediately adjacent to it (e.g., no yellowing or dying vegetation). The corrective actions register and incident register do not contain any reports of phytophthora.	Corrective actions register Incident register	Not applicable
F2.3	Environment Management Measures - Biodiversity B2(iv)	Pathogen control – Foot and Mouth Disease Ensure vehicles, plant and equipment are clean prior to arrival on construction area, inspected by a competent person and a register of inspected vehicles is kept for the duration of the project. - Minimise movement of vehicles, plant and equipment between projects. - On properties with livestock, restrict the access outside the construction area, particularly to livestock holding areas. - Promote good hygiene practices for vehicles, plant, clothing and equipment (e.g. at prestart meetings and Toolbox talks) - Monitor official information about the extent of disease infection and quarantine including: – Foot-and-mouth disease - DAFF (agriculture.gov.au) https://www.agriculture.gov.au/biosecurity-trade/pests-diseasesweeds/animal/fmd – Outbreak | National pest & disease outbreaks https://www.outbreak.gov.au/ – Agriculture Victoria - Foot-and-mouth disease https://agriculture.vic.gov.au/biosecurity/animal-diseases/foot-and-mouthdisease - Ensure that anyone who has travelled to a high risk area does not come on site for at least 7 days. - Disinfect any vehicles, plant, clothing and equipment arriving from an identified high risk area. - Continually review risk and update biosecurity measures to meet any increased risk. This may include providing facilities to clean vehicle, plant or equipment on entry and exit to certain agricultural properties. Work in High Risk Areas - Review the Project Risk Assessment to consider this escalation. - Comply with control orders, prohibitions, restrictions and requirements for any relevant APA or government declared restricted area. - Obtain Agriculture Victoria permits if it is necessary to access a declared restricted area (Livestock Disease Control Act 1994 (Vic)). Comply with conditions of the permit, including specific entry and exit points, and decontamination requirements for vehicles/equipment that are on the property. - Notify potentially impacted landowners if vehicles, personnel, plant or equipment operating on their property have come from a site or location which has since been identified as high risk or contaminated.	Manage any risk of Foot and Mouth Disease	See findings in B1/B2. Biosecurity ToolBox talk info sheet for Merri Creek has been sighted. **<u>OFI:</u>** SCA advised that there is no evidence that supports the advice from government regarding foot and mouth disease. The auditors have not sighted evidence relating to high risk areas.	Biosecurity ToolBox talk info sheet for Merri Creek	Opportunity for improvement

F2.3	Environment Management Measures - Biodiversity B3	<u>Contractor awareness</u> Before commencing site work, all Project personnel must attend an induction that outlines environmental management requirements. This must include: - No-go zones - Biodiversity values of the construction area, specifically areas of native vegetation and threatened species habitat - Habitat and fauna awareness - Location of other environmentally sensitive areas - Native vegetation removal regulations and penalties for non-compliance - EPBC Act and FFG Act regulations and penalties for non-compliance.	All personnel to attend an environmentally focused induction	Training and induction register verifies all personnel have completed environment induction. The auditors attended the induction prior to attending site, and confirm that the environmental induction includes outlines environmental management requirements. **<u>OFI:</u>** Native vegetation removal regulations and penalties for non-compliance and EPBC Act and FFG Act regulations and penalties for non-compliance were not within the induction presentation.	Training and induction register Environmental induction slideshow	Acceptable
F2.3	Environment Management Measures - Biodiversity B4	Groundwater Dependent Ecosystems (GDE) mitigation • Engage an arborist to assess the potential for long-term risk of harm to native trees based on the expected timeframe for dewatering, depth to which water is modelled to be drawn down, and the proximity of the trees to identified and potential GDEs • Develop and implement a Tree Management Plan (B23) • Salvage aquatic and terrestrial fauna during open cut dewatering activities within creeks. Salvage and relocation must be in accordance with the protocols outlined within the FMP, including: – Within waterways, undertake checks for the species during dewatering to remove any individuals found. – At locations specified in the ELL (refer to the ELL in Appendix E), install fauna-proof fencing along the edge of the construction area once habitat has been made unsuitable and cleared of individuals to prevent individuals recolonising for the period between clearing and construction – Handling and relocation protocols, e.g. animal storage, hygiene controls – Locations of suitable habitat (within 100 m for terrestrial fauna and 200 m for fish) to relocate any individuals found – A protocol for any individuals found where appropriate release habitat is not available within 100 m (threatened species) or 150 m (non-threatened species) of capture. – Means of treatment or disposal for any individuals injured or killed by works. Measures to manage risk of harm to GDEs are described in EMM GW1 and EMM GW2.	Manage risk of impact to GDEs appropriately	See GW1 & GW2.		Acceptable
F2.3	Environment Management Measures - Biodiversity B5	<u>Lighting impacts to fauna</u> Design and manage lighting in accordance with best practice lighting design as outlined within the National Light Pollution Guidelines for Wildlife (DAWE 2020) where these do not conflict with construction safety. Where lighting is required, avoid unnecessary light spill into surrounding areas that provide habitat for threatened fauna as far as reasonably practicable.	Manage lighting impact on areas of potential fauna habitat	During the field inspection, the only sites with temporary lighting provisions were at the HDD locations. The light towers were pointed in towards the construction areas and not outside the working areas.	Visual observations	Acceptable
F2.3	Environment Management Measures - Biodiversity B6	<u>Noise impacts to fauna</u> Construction noise and vibration must be managed in accordance with the requirements identified in EMM NV1 and NV2.	Manage noise impact on areas of potential fauna habitat	Refer EMM NV1 and NV2 (see noise and vibration section above).	Refer EMM NV1 and NV2 (see noise and vibration section above).	Acceptable

F2.3	Environment Management Measures - Biodiversity B7	<u>Site rehabilitation after construction</u> - Reinstate the construction area with consideration of native vegetation composition indigenous to the area as applicable to site conditions, adjacent ground surface levels, and in consultation with the landholder and in accordance with any agreement made as part of easement negotiations. - In known and assumed Golden Sun Moth and Striped Legless Lizard habitat that contain native patches of grassland, revegetate areas with appropriate native grass seed mix (e.g. Wallaby Grass, Spear Grass, Kangaroo Grass) that provide habitat and food sources. On private property this will be in consultation with landowners. Rehabilitation of construction areas and all temporary facilities, temporary access tracks and extra works areas would begin as soon as practicable after the completion of the construction activities, with the aim of restoration of ground cover within six months. Rehabilitation activities are estimated to take approximately three months. Any applicable replanting will be undertaken within 12 months of construction completion (subject to seasonal requirements). Subject to landholder agreement the following requirements to return habitat features to the construction area will be considered: Return habitat features removed during construction such as large hollow logs and large rocks or rock piles to the construction area during rehabilitation if consistent with rehabilitation objectives at a particular location. Rip soil surfaces that have been compacted due to construction activities, such as those subject to traffic or storage areas within the construction area, to allow the topsoil to bind with the subsoil and increase water filtration, as appropriate, prior to revegetation with indigenous native species. Do not rip areas that are either known or assumed Golden Sun Moth or Striped Legless Lizard habitat and contained patches of native vegetation prior to construction. Subject to MWC requirement, Merri Creek will take into consideration appropriate instream and terrestrial reinstatement of habitat with regard to Growling Grass Frog habitat.	implement site rehabilitation in accordance with this condition and site specific management plans	This audit is focused on the construction phase. Rehabilitation is the focus of the next audit.		Not applicable
F2.3	Environment Management Measures - Biodiversity B8	<u>Topsoil management</u> Topsoil imported to construction area from external locations must be free of weeds and pathogens. Stockpiled topsoil removed from weed-infested sites for the Project must only be re-used, as far as reasonably practicable, in the location that it was originally sourced from. Stockpiled topsoil from weed-infested sites may be reused where soil is sourced from sites supporting Golden Sun Moth where larvae may be present. For impacted areas that are Golden Sun Moth habitat: - In areas that are to be disturbed temporarily (i.e., reinstated after construction) and that require topsoil removal, the period between pre-trenching topsoil removal and post-trenching topsoil replacement must be minimised to the extent practicable. - Where the removal of topsoil is unavoidable appropriate measures to remove, separate (from sub-soils) and replace topsoils in the construction area must be undertaken. As far as reasonably practicable, topsoil will be progressively reinstated. - Stockpiled topsoil from weed-infested sites may be reused at the same location where the soil is sourced from if the site supports golden sun moth and where larvae may be present. -Manage dust during the Golden Sun Moth flying season (November to January) in properties that are known or assumed Golden Sun Moth habitat to minimise risk of harm from dust on flying individuals as per requirements in EMM AQ1.	Comply with this condition Manage GSM habitat in accordance with this section of the CEMP and the threatened species management plan	APA advised that no topsoil has been imported. The auditors did not visit and areas of known Golden Sun Moth habitat and the audit was not undertaken during the Golden Sun Moth flying season.		Acceptable
F2.3	Environment Management Measures - Biodiversity B9	Fauna management Measures to minimise risk of harm to native fauna must be developed and will be incorporated into a Fauna Management Plan for approval by DEECA (prior to clear and grade commencing). The Plan must include the species specific management plans for growling grass frog (as required by EMM B21), golden sun moth (as required by EMM B19), and striped legless lizard (as required by EMM B20). The Plan must include the following requirements (see following columns):		The Fauna Management Plan ((918035-PL-LH-0094, Rev 1, 1 Sept 2022) has been sighted and contains the content required of this condition. The document revision history shows the plan was reviewed by DELWP (now DEECA). Weekly inspection reports contain fauna commitments (example inspections provided contain no breaches). Observation: The Fauna MP was reviewed by DELWP (now DEECA), however, this not explicitly confirm the plan was approved by DELWP.	Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022)	Acceptable

F2.3	Environment Management Measures - Biodiversity B9	• Woody vegetation, trees and hollows to be removed must be inspected for fauna by a suitably qualified wildlife handler immediately prior to removal. Measures to minimise risks of harm to fauna must include: – A walk-through/visual inspection of habitat to be removed immediately prior to clearance to flush out fauna and capture and relocate – Wildlife handler to be present during hollow-bearing tree removal and habitat removal for Growling Grass Frog and Striped Legless Lizard – Wildlife handler to provide advice, which must be implemented, that minimises risks of harm to fauna, and detailing appropriate measures to manage injured wildlife. • Trench management: Work areas, particularly excavations and trenches left open overnight, must be visually inspected for fauna at the start of each workday. Any trapped fauna to be removed prior to work commencing. Measures are to include egress points along the trench to allow fauna to escape the trench when unattended, protocols for trapped fauna removal and provision of in-trench shelters for sections left open overnight For all threatened fauna: • Keep records of all fauna interactions, listing the species encountered, date, nature and outcome of the interaction and GPS coordinates. All fauna records will be submitted to the Victorian Biodiversity Atlas. • Any threatened species found within the construction area and needing relocation to avoid harm or death must be relocated to the nearest available suitable habitat. Details of suitable locations and a protocol for release for any locations where this is expected to be in excess of 100m from the point of capture is required.	Manage trench checking and fauna handling in accordance with this condition	Trenching Fauna Reports have been sighted. Reports identify presence of fauna ramps and fauna shelters. Reports did not report any trapped fauna. During the field inspection, the auditors noted the presence of fauna ramps in open trenches (e.g., KP 0, 1, 2, and 10.5) and also met the snake catcher on site. WORM - Pre-clearance Fauna Survey Report at KP 42 dated 06/02/23 has been sighted. The survey was undertaken by Richard Swindells (Fauna Handler), the report notes that no fauna were present. Three small hollows were identified as potential habitat and were searched before removal with torch and camera. The hollows, trunk and large limbs were retained for site rehab. Observation: no records for species interactions (if any) have been sighted by the auditors.	Trenching Fauna Reports WORM - Pre-clearance Fauna Survey Report at KP 42 dated 06/02/23.	Acceptable
F2.3	Environment Management Measures - Biodiversity B9	• Native fauna is to be captured, handled and relocated only by a qualified and authorised fauna handler. All fauna handling must be in line with a Wildlife Authorisation under the Wildlife Act and any conditions within. It is an offence under the Wildlife Act 1975 to handle or disturb fauna without authorisation. • Records of all fauna relocations must be kept. • Records of all fauna deaths or injuries to be kept and reported to DEECA. • Exposed pipe ends must be capped each night to prevent fauna entry. • Prepare and implement Kangaroo management for areas where connectivity for fauna movement will be restricted during construction.	Manage trench checking and fauna handling in accordance with this condition	Wildlife permits 10010466 issued 15/09/22, expiring 30/04/23 have been sighted for the Spiecapag Environment Advisor (Renee James) and Richard Swindells (Fauna catcher). Certificate of completion of course in reptile and venmous snake handling 2250VIC dated 7/09/22 attained by the Spiecapag Environment Advisor (Renee James) has been sighted. Trenching Fauna Reports have been sighted. None have reported fauna present. Spiecapag environmental incident report form (No.15) dated 16/02/23 at KP 5.6 has been sighted. The report notes that a Tiger Snake (dead) was shaken out of excavator bucket. Weekly Site Report 29 (sent to DEECA) (week ending 19/02/23) reports fauna death - 16/02/2023 - Fauna death – tiger snake during rock sieving. **OFI:** The auditors sighted numerous sections of open pipe that were missing fauna caps (e.g., sites KP 49, KP49.5 & KP48). APA was aware of this and said they were in the process of ordering more.	Trenching Fauna Reports Weekly Site Report 29 (week ending 19/02/23) Fauna permits 10010466 Certificate of completion of course in reptile and venmous snake handling 2250VIC	Opportunity for improvement
F2.3	Environment Management Measures - Biodiversity B9	Temporary strainer assemblies and gateways must be installed at every fence line that is intersected by the construction area in agreement with the landowner and in accordance with construction specifications. This must provide security for farmstock during construction. Temporary security fencing must be installed around the construction area in all public open spaces to prevent unauthorised access to the right of way (ROW) and for public safety. When it is determined that there is no further safety risk to members of the public all security fencing will be removed	Secure Right of Way to prevent stock and public access.	Property Management Plan (WPT 059) specifies fencing requirements involving Stock Crossings (SC1, SC2, SC3, SC4) to be spring loaded plastic handle gate breakers on either side of RoW. 700 m of fencing has been estimated to be reinstated. The auditors noted the presence of temporary strainer posts at various fence lines (the entire RoW was not inspected), with no breaches of fences by stock from adjacent paddocks. Temporary security fencing was sighted around KP 2 in the residential area to exclude the public from the construction RoW.	PROPERTY MANAGEMENT PLAN (WPT 059)	Acceptable
F2.3	Environment Management Measures - Biodiversity B10	Surface water sedimentation and runoff Manage surface water sedimentation and risks of harm in accordance with EMM SW4 and EMM SW5.		See EMM SW4 and EMM SW5.		Acceptable
F2.3	Environment Management Measures - Biodiversity B11	Surface water contamination Manage chemicals fuels and hazardous materials in accordance with EMM C6 to minimise risks of harm on ecological values as far as reasonably practicable.		See EMM C6		Acceptable

F2.3	Environment Management Measures - Biodiversity B15	<u>Reinstate native vegetation</u> Where natural regeneration of species in situ is not feasible, revegetate the area using seed or nursery stock obtained from within the local area, to support preservation of native vegetation values within the broader area. Prepare a Site Rehabilitation Plan(s) for revegetation of native vegetation within the construction area, including: -the whole of the construction area within the southern paddock of Property 1/PS733045 -Conservation Areas 34a and 28b (refer to the ELL in Appendix E). The plan(s) shall be prepared in consultation with each landholder and in accordance with any agreement made as part of easement negotiations. The plan(s) is to be verified by a qualified and experienced bushland restoration land management contractor. Revegetation with native vegetation is to be undertaken in accordance with the Site Rehabilitation Plan(s). The Site Rehabilitation Plan is to include any specific monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils, as they arise. Site Rehabilitation Plans for Conservation Areas must be submitted to and approved by DEECA.		N/A - this is the scope of a future audit (rehabilitation)		Not applicable
F2.3	Environment Management Measures - Biodiversity B16	<u>Additional site assessment and management (construction)</u> - Any removal or destruction of native vegetation outside the construction area that occurs accidently or without prior approval must be reported as an incident. The task that caused the incident must cease immediately at that location. The accidental clearing area must be subject to: - Botanical surveys to assess and map the condition and extent of native vegetation. - If site-based information of the native vegetation can no longer be observed, DEECA mapped data must be used to determine offset requirements. - The extent and condition of accidental vegetation removal must be reported to the relevant authority as soon as reasonably practicable. - A qualified arborist must assess any damage to trees and must identify tree protection zones (TPZs) and SRZs. All native vegetation to be retained must be demarcated via fencing, so that no-go zones are clearly delineated and noted by workers, and any further accidental loss of vegetation is avoided The task may recommence at the location subject to the completion of a root cause analysis and identification associated prevention controls.	Contingency should any native vegetation be removed or destroyed outside the construction area accidentally.	Corrective Actions Register and incident register has been sighted, both indicating that no native vegetation clearing outside the construction area has been reported (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). However, a near miss for 'slashing of vegetation outside the RoW' was reported at KP 41 on 27/10/22 in the incident register.	Corrective Actions Register Incident register (excel spreadsheet)	Acceptable
F2.3	Environment Management Measures - Biodiversity B17	<u>Barriers to fish passage and / or migration</u> Minimise the creation of a barrier that impedes native fish passage and /or migration, and the time required for installation of the pipeline during open cut trenching across Merri Creek by using the following approaches: - Assemble and prepare the pipeline so it can be installed as soon as reasonably practicable once trenching through the watercourse is complete. - Remove all obstructions to flow and passage as soon as reasonably practicable after the pipeline has been laid and backfilled. That is, with the exception of the flume pipe at Merri Creek, which may not be immediately removed after the pipe has been laid. - Reinstate the exposed trench within the watercourse and riparian zones as soon as reasonably practicable following the installation of the pipeline. - Works on a designated watercourse must be completed in accordance with MWC requirements.	Undertake construction across Merri Creek in accordance with the Site Specific Management Plan.	Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028) has been sighted. The SSEMP was approved by MWC. See: 'Merri Creek' tab within this spreadsheet that covers Commitments within the Site Specific Management Plan. The auditors visited Merri Creek in the early stages of construction (before trenching and pipe laying), therefore, they were unable to verify the approaches outlined in column C.	Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028, Rev 1 28 Nov 2022)	Acceptable

F2.3	Environment Management Measures - Biodiversity B18	<u>Value-specific mitigation</u> Develop and implement specific measures to protect EPBC Act and/or FFG Act communities that are impacted, including: • Measures required by EMM B1 • Establishing no-go areas around plant populations • Marking any significant values such as large old trees on site plans • An arborist's assessment to establish no-go areas around retained large old trees close to the construction area • On-site supervision by an environmental management specialist, botanist or arborist to avoid accidental damage to retained native vegetation during construction works in GEWVVP • Retention of stockpiled vegetation to be used for site rehabilitation • Rehabilitating disturbed areas as soon as reasonably practicable • A Tree Management Plan must be prepared based on the construction area and surveyed tree locations (EMM B23) • Relocate, or otherwise protect, the individual Arching Flax-lily - Dianella longifolia var. grandis (refer to the ELL in Appendix E), if it persists and can be located on site.	Manage work in accordance with this condition	See rows pertaining to B1. The auditors observed no-go areas around plant populations at the following sites: - KP 10.5 (tributary of Jackson's Creek) - Tree Protection zone, bunting along edge of RoW. - KP 42 (Merri Creek) - Tree Protection zone, bunting along edge of RoW. - KP 48 - Tree Protection zone, wire fencing along edge of RoW APA and Spiecapag had full-time field-based Environmental Advisors on the project, who monitored the environmental management of construction. Topsoil cleared for the construction RoW was stockpiled alongside the RoW for later reinstatement. There was very little vegetation mixed among, or stockpiled separately to this, as the RoW traverses mostly farming pasture. An email dated 16/10/22 from the Acting Access and Approvals Manager SE Australia (APA) reports a relocated Flax-lily to biosis. APA advised the Flax-lily was moved to the side of the work area.	WORM Environmental Line List Appendix E - 18035-PL-HSE-004 CEMP Rev 10 Email from APA reporting the relocation of a Flax-lily to biosis (APA 027)	Acceptable
F2.3	Environment Management Measures - Biodiversity B19	<u>Fauna Mitigation – Golden Sun Moth</u> Prepare and implement a Golden Sun Moth Management Plan and obtain approval for the plan from DEECA. The plan must include details regarding: - Location of Golden Sun Moth habitat and method for mitigation measures in these areas - Topsoil management (including as outlined within EMM B8) - Rehabilitation measures - Ongoing management and monitoring.	Manage construction in accordance with these commitments	The Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022) has been sighted and contains the content required for the golden sun moth. The document revison history shows the plan was reviewed by DELWP (now DEECA).	Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022)	Acceptable
F2.3	Environment Management Measures - Biodiversity B20	<u>Fauna Mitigation – Striped Legless Lizard</u> Prepare and implement a Striped Legless Lizard Management Plan and obtain approval for the plan from DEECA. The plan must include details of the location of striped legless lizard habitat and the following measures: -Methods for salvage of Striped Legless Lizards using the artificial shelter (roof tile grid) method, where permitted, including: Timing for installation of artificial shelters Timing of artificial shelter checks -Methods for salvage of Striped Legless Lizards in locations where the artificial shelter method is not permitted, including: Active searches of areas identified as Striped Legless Lizard habitat (including rock rolling and lifting debris) prior to slashing - Slash areas of known and assumed habitat one week prior to active searches, to make them less suitable for lizards and encourage lizards to vacate the construction area. - Slashing heights to be limited to no lower than 50 mm to minimise risk to individuals Salvage protocol including: Maximum distance of relocation Procedures for instances where suitable habitat is not present within suitable relocation distances. - Any deviation of proposed salvage and relocation measures required in the event tussock skink or other species are also captured. - All salvage and relocation activities are to be undertaken by a suitably qualified wildlife handler - Install lizard-proof fencing along the construction area boundary (where it meets lizard habitat) to prevent individuals from recolonising the site during construction. Fencing must be a solid material (e.g. polyethylene sheeting or plastic) that is 400 mm high and dug into the ground at a depth of 100 mm - Develop a record-keeping, storage, and treatment or disposal protocol for killed or injured individuals, in accordance with DEECA advice. All such records will be reported to DEECA -Management of topsoil as per EMM B7 and B8 is also required.	Manage construction in accordance with these commitments	The Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022) has been sighted and contains the content required for the striped legless lizard. The document revision history shows the plan was reviewed by DELWP (now DEECA).	Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022)	Acceptable

F2.3	Environment Management Measures - Biodiversity B21	<u>Fauna Mitigation – Growling Grass Frog</u> Prepare and implement a salvage and translocation plan for the Growling Grass Frog and obtain approval for the plan from DEECA. The salvage and translocation plan must include details regarding: - Making habitat unsuitable for Growling Grass Frog by slashing bank vegetation prior to construction to discourage individuals from remaining within the site. - Undertaking searches for the species, to remove any individuals in the area where habitat has been made unsuitable, on three days prior to further disturbance of the area. -For dams proposed for removal that have been identified as habitat, install fauna-proof fencing around the waterbodies once habitat has been made unsuitable and cleared of individuals to prevent individuals recolonising for the period between clearing and construction - For waterways identified as habitat, install fauna-proof fencing along the edge of the terrestrial works area once habitat has been made unsuitable and cleared of individuals to prevent individuals recolonising for the period between clearing and construction. - Install fauna-proof fencing within 100 m of areas with habitat known or assumed to support Growling Grass Frog. - Handling and relocation protocols e.g. animal storage, hygiene controls -Locations of suitable habitat (within 100 m) to relocate any individuals found - A protocol for any individuals found where appropriate release habitat is not available within 100 m of capture - Means of treatment or disposal for any individuals injured or killed by works. All deaths or injuries to be recorded and reported to DEECA. - Fauna-proof fencing for Growling Grass Frog will be of a suitable structure and material to prevent frog movement from one side of the fence to the other - Minimise the risk of high flow events on Growling Grass Frog habitat through site-specific measures outlined in EMM SW7 and EMM SW9 including but not limited to timing of works, Flood Management Plan and Response Plans.	Manage construction in accordance with these commitments	The Fauna Management Plan ((918035-PL-LH-0094, Rev 1, 1 Sept 2022) has been sighted and contains the content required for the growling grass frog. The document revision history shows the plan was reviewed by DELWP (now DEECA).	Fauna Management Plan (918035-PL-LH-0094, Rev 1, 1 Sept 2022)	Acceptable
F2.3	Environment Management Measures - Biodiversity B22	<u>Fauna Mitigation – Platypus</u> Protect Platypus at Jacksons Creek in accordance with the Platypus Management Guidelines (Australian Platypus Conservancy https://platypus.asn.au/management guidelines/).	Manage construction in accordance with these commitments	Auditors did not visit Jacksons Creek. **<u>OFI:</u>** Platypus management is not covered within the Fauna MP.		Not applicable
F2.3	Environment Management Measures - Biodiversity B23	<u>Remnant Trees</u> Develop and implement a Tree Management Plan to identify all remnant native (non-planted) trees within 15 m of the construction area boundary, deemed “lost” through encroachment of their TPZs and specifies: -Trees to be impacted as part of the construction activities -The condition and arboricultural value of the trees. Maximise tree retention to the extent practicable through detailed design and selection of construction methods to minimise canopy loss including by retaining trees where practicable and minimising risk of harm to trees as far as reasonably practicable. Arboricultural assessments must inform the Tree Management Plan in order to maximise tree retention and long-term viability of individual trees including those deemed “lost”through encroachment of their TPZs or groundwater changes. The Tree Management Plan must be informed by a pre-construction site assessment to confirm the area and number of trees proposed to be impacted. The area and number of trees actually removed are to be confirmed through a postconstruction arborist assessment.	Manage construction in accordance with the Tree Management Plan	Appendix G of the APA WORM Rev10 TREE IMPACT ASSESSMENT REPORT & TREE PROTECTION MANAGEMENT PLAN (arborist report). Identifies remnant trees within the construction area.	APA WORM Rev10 TREE IMPACT ASSESSMENT REPORT & TREE PROTECTION MANAGEMENT PLAN (arborist report).	Acceptable
F2.3	Environment Management Measures - Biodiversity B24	<u>Provide Offset Management Plan</u> Provide offsets in accordance with the Guidelines for the removal destruction or lopping of native vegetation (DEECA, 2017). Develop and implement Offset Management Plans as required by DAWE conditions of approval (EPBC 2019/8569).	Prepare offset management plans for State and Federal Offsets.	Updated Ecological Offset Strategy, dated 30 September 2021 (tracked changes) has been sighted and contains the provisions outlined in column C.		Acceptable
CULTURAL HERITAGE						

F2.4	Environment Management Measures - Cultural Heritage CH1	Cultural Heritage Management Plans Implement and comply with the Cultural Heritage Management Plans (CHMP 16594, CHMP 16593 and 18496) management conditions and contingencies.	Comply with Project CHMPs	Cultural heritage is checks are covered in weekly inspection reports. Cultural heritage sites were sighted at KP 16.8 & KP 45.9. Both sites had correct signage and fencing in place. Observation: Both the incident register and Corrective actions register contains one reportable cultural heritage incident titled 'Delineation from CH management plan' at KP 45 on the 8/11/22 and was closed on the 8/11/22. However, APA advised that this was not an incident, but a procedural nonconformance involving a contractor undertaking further ground disturbance works (following clear and grade) within 100m of a Cultural Heritage Site without completion of a Cultural Heritage inspection by Wurundjeri, which is required by the CHMP 18496.		Acceptable
F2.4	Environment Management Measures - Cultural Heritage CH3	Listed historic heritage sites For any potential impact to VHI sites, obtain consent from Heritage Victoria in advance and implement management measures required in the consent	Comply with Heritage Vic Consent (Holden Rd)	Holden Cobbled Stone Road (H7822-2283), Consents to Damage: Historical Archaeological Supporting Documentation, prepared by Biosis on 30 Nov 2022, has been sighted and covers off on potential damage to the road (thrust bore crossing proposed to minimise damage). Notice of Consent to Damage C1874 for Victorian Heritage Inventory site Holden Cobbled Stone Road site (H7822-2283) from the Principal Archaeologist at Heritage Victoria dated 25/10/22 has been sighted.	Notice of Consent to Damage C1874 for Victorian Heritage Inventory site Holden Cobbled Stone Road site (H7822-2283) Holden Cobbled Stone Road (H7822-2283), Consents to Damage: Historical Archaeological Supporting Documentation	Acceptable
F2.4	Environment Management Measures - Cultural Heritage CH4	Unlisted historic heritage sites Should an unknown historic heritage site, value or object be discovered during construction, follow the unexpected finds procedure.	Comply with unexpected finds procedure if potential heritage item found.	Email from Spiecapag Environmental Advisor dated 24 January 2023 notifies Biosis of an artefact that was found at KP 31.56. Email states a 10x10 exclusion zone was been established around the site and asked when a Heritage Advisor is available to come and collect the artifact. Biosis responded with details regarding collection on the same day (24/01/23). Email from the Senior Heritage Consultant at Biosis dated 18/05/23 confirms the artefact was identified through the Elder compliance inspections as split quartz flake with two pieces, with breakage. Biosos noted that the artefact record identities will be included in an updated Aboriginal place registration(s) on the Victorian Aboriginal Heritage Register (VAHR) as part of reporting. This indicates that the unexpected find procedure was implemented.	Copy of email correspondence between Spiecapag Environment Advisor and Project Archaeologist at Biosis, 24 January 2023.	Acceptable
F2.4	Environment Management Measures - Cultural Heritage CH5	Investigate the significance and treatment of the drystone wall intersected by the pipeline at 170-200 Donovans Lane, Beveridge before construction commences in the vicinity of this site.	Prepare an evaluation report and implement recommendations	A dry stone wall assessment for Donovans Lane was sighted, prepared by Biosis in November 2022. It was determined to be of historical, aesthetic and technical significance at a local level. This dry stone wall was sighted at KP49 (disassembled). The APA Environmental Advisor advised the auditors that the wall will be reassembled to its original form post-construction. 'Do not remove' signage was in place at the remaining section of the wall. A recommendation to stack the stones was made in the Biosis report.	Letter from Biosis to APA, dated 15 Nov 2022, regarding dry stone wall assessment and recommendations for 170-200 Donovans Lane, Beveridge and 274 & 280 Summerhill Road, Wollert.	Acceptable
F2.4	Environment Management Measures - Cultural Heritage CH6	Impacts on the Merri Creek Site of Geological and Geomorphological Significance (VRO Site 35) Determine appropriate protection and restoration measures for the geological and geomorphological values of the site based on the advice of an appropriately qualified geomorphologist. Ensure that disturbance to the natural geomorphology of Merri Creek is minimised during construction to the extent practicable, including disturbance from construction of the pipeline crossing as well as the construction and use of the temporary access crossing, through implementation of appropriate measures in: • the detailed design of the Merri Creek crossing • the construction management plan for the Merri Creek crossing. Ensure that rehabilitation of the construction area at this site restores the natural geomorphology of the site to the extent reasonably practicable. Consultation is to be undertaken with the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation in regard to proposed protection and restoration measures.	Prepare a report on geology and geomorphology and manage Merri Creek crossing construction accordingly.	Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028) includes the Measures to Minimise Potential Impacts on Geoheritage from the Sight Geology and Geomorphology report. The auditors sighted the Geology and Geomorphology report prepared by Environmental GeoSurveys Pty Ltd (Neville Rosengren) for Biosis Pty Ltd V1: 21 September 2022. During the field inspection, the auditors sighted excavated large rocks protected by bunting upslope of the Merri Creek, which the APA Environmental Advisor stated was rock of geomorphological significance, which will be reinstated post-construction. Signage to this effect was in place. **See:** Merri Creek SSMP tab within this spreadsheet. Rehabilitation measures will be audited during the rehabilitation audit.	Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028, Rev 1, 28 Nov 2022) The auditors sighted the Geology and Geomorphology report prepared by Environmental GeoSurveys Pty Ltd (Neville Rosengren) for Biosis Pty Ltd V1: 21 September 2022.	Acceptable
CONTAMINATION						

F2.5	Environment Management Measures - Contamination C1	<u>Implement spoil management measures</u> Prepare and implement spoil management measures in accordance with relevant regulations, standards and guidelines including EPA Publication 1834 Civil construction, building and demolition guide. The spoil management measures must be developed in consultation with the EPA Victoria and include processes and measures to manage all spoil types i.e. all excavated material. The main spoil types would be uncontaminated soils and potentially small volumes of priority waste , including Category D waste or soil containing asbestos . The spoil management measures must define roles and responsibilities and include requirements and methods for: **General** Manage contaminated land to minimise risk of harm to human health or the environment, including identification, investigation and assessment and carrying out clean-up of that contamination to the extent reasonably practicable where the contamination presents a risk of harm. Persons in management or control should also provide adequate information to anyone who may be affected by the contamination or who may become a person in management or control. Leaving contaminated soils in-situ to the extent possible, while complying with the requirements of the duty to manage contamination specified above. Complying with applicable regulatory requirements including EPA Publication 1834 Civil construction, building and demolition guide and the ERS. Investigations in accordance with the Australian Standard AS 4482.1:2005 Guide to the investigation and sampling of sites with potentially contaminated soil, the ASC NEPM and the EPA Victoria Industrial Waste Resource Guidelines (IWRGs) Assessment of any material imported to the site for use as backfill in accordance with IWRG 702 and EPA Publication 1828.2. Imported material must meet the 'Fill Material' criteria as defined in Table 3 of EPA Publication 1828.2. **Assessment** Complete further testing to categorise soils in the vicinity of the railways for onsite re-use or offsite disposal. Following these further investigations, update the Environmental Line List (refer to the ELL in Appendix E) and review risk register to include any new areas of potential contamination. Identifying where any contaminated or hazardous material is exposed during construction and how it would be made safe for the site owner and the environment. Environmental values of land and ASC NEPM guidance on criteria protective of those environmental values must be considered for the land uses in these areas. If non-aqueous phase liquid (e.g. oil, petrol, diesel and solvents) is present in soil or groundwater within the authorised project construction footprint and exposed during construction activities, it must be, so far as reasonably practicable: (a) cleaned up; and (b) if the source of the non-aqueous phase liquid is located on the land, the source of the liquid must be removed or controlled. **Unexpected contamination** Identifying, containing and managing unexpected contamination in accordance with applicable regulatory requirements including EPA Publication 1828.2and IWRG 702.	undertake testing as outlined and manage any discovery of contaminated soil in accordance with the commitments	The Environmental Corrective Action Register and incident register has been reviewed and does not contain any incident involving discovery of contaminated land. The Spiecapag Environmental line list records the following contaminated land: - KP8.30-8.32 Contamination Railway crossing, located in existing easement. - KP8.40-8.43 Contamination Potential Acid sulfate soils (PASS), located in existing easement. - KP9.95-10.13 Contamination Rural property storing wrecked cars, located in proposed easement - KP33.36-35.47 Contamination Retarding basin, located in proposed easement - KP41.03-41.05 Contamination Railway crossing / rail reserves, located in proposed easement - KP42.72-42.74 Contamination Potential Acid sulfate soils (PASS), located in existing easement. Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23 provides details of contaminated soil disposal that has occurred including date, job number, staff, time, hrs/qty, rates, item and description. Observation: auditors did not sight the relevant incident reports/documentation to match the contaminated soil disposal records. Observation: Auditors did not sight test records in proximity of railways.	Environmental corrective actions register (pdf extract) Incident register (excel spreadsheet) Spiecapag Environmental Line List Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23.	Acceptable

		Notification of EPA and others who may be impacted by this contamination in accordance with the EP Act and the EP Regulations. **Handling, stockpiling and transport** Conducting all spoil handling and transport for offsite disposal or relocation within the Project boundary in accordance with the EP Regulations, EPA Publication 1828 and EPA IWRG 702, including completing any applicable Waste Tracking records (or Declaration of Use), ensuring transporters are registered with the EPA and that the offsite disposal site is to a Lawful Place. Managing construction works which can lead to runoff of contaminated and uncontaminated soil from stockpiles and excavations into nearby waterways, in accordance with SW1 and SW4. Regularly monitoring weather conditions and planning works accordingly to avoid or minimise risk of harm to sensitive receptors from works during adverse weather (i.e. runoff from rainfall) as far as reasonably practicable. Implementing personal protective equipment and standard hygiene practices when handling contaminated spoil. Separating stockpiles of trench spoil into contaminated and uncontaminated soil. As both of these waste types can adversely impact the environment (e.g. through runoff to waterways), all stockpiles must be managed in accordance with EPA Victoria Publication 1834 Civil construction, building and demolition guide and EPA Publication 1895 Managing Stockpiles, 2020.				
		Where it is necessary to excavate contaminated soils, stockpiling these separately, with containment and treatment measures appropriate to the type of contamination present. This must include: All stockpiles of potentially contaminated spoil must be appropriately secured, lined and bunded to prevent leaching All stockpiles of potentially contaminated spoil must be appropriately covered and bunded to limit rainwater ingress, dust generation and contact by fauna Stockpiling of contaminated soil must be kept to a minimum and removed to landfill or other use at the earliest opportunity Handling and transport of contaminated spoil for off-site treatment/disposal in accordance with EP Regulations. Transport companies must be licensed by EPA Victoria to carry contaminated soil and Waste Tracker documentation must be completed. Managing PFAS-impacted soil (if any) in accordance with the PFAS NEMP, and EPA guidance including EPA Publications 1669, 1836 and 1968. Monitoring, recording and tracking spoil and other waste handling including but not limited to stockpile management, trucking and destination tracking, and sampling results.				
		Reuse or Disposal Assessing potentially contaminated spoil in accordance with NEPM ASC, NEMP v2.0 and EPA Publication 1828.2, IWRG 702 and other EPA guidance as appropriate. Considering the waste management hierarchy which aims to reduce or eliminate wastes (to increase sustainability and reduce costs) the preference is to re-use spoil where practicable, with spoil that is unable to be reused to be disposed offsite as the last option. Disposing drilling muds in accordance with EP Regulations and EPA guidelines, including Publication 1827 and 1968.				

F2.5	Environment Management Measures - Contamination C2	Managing any unknown contamination Contamination that was not expected during construction may be identified by visual or olfactory observations, the presence of asbestos and other anthropogenic material. The responses must include, as a minimum: - Cease ground disturbance at the location of the unknown contamination and within the immediate vicinity. - Assess the contamination and identify appropriate management actions with reference to the management measures EMM C1 and GW3. - Following implementation of the identified management actions, recommence works at the location and continue to watch for signs of further contamination.	If any unknown contamination is discovered, manage in accordance with this condition	No discovery of contaminated land has been recorded in the environmental corrective actions register or incident register (most recent event in the corrective actions register is dated 28/02/23 and 16/05/23 in the incident register).	Environmental corrective actions register Incident register	Acceptable
F2.5	Environment Management Measures - Contamination C3	Minimise risks of harm from disturbance of acid sulfate soil PASS may be present in saturated alluvium beneath and within close proximity to the creeks. Complete further acid sulfate soil assessment prior to dewatering at the Tame Street Drain and floodplain. The spoil management measures referenced in EMM C1 must include requirements and methods to minimise risks of harm from disturbance of acid sulfate soil as far as reasonably practicable, including but not limited to: Characterising acid sulfate soil and rock prior to excavation in accordance with EPA Publication 655.1 Acid sulfate soil and rock. Developing appropriate stockpile areas including lining, covering and runoff collection to prevent release of acid to the environment. Identifying suitable sites for re-use, management or disposal of acid sulfate soil. Preventing oxidation that could lead to acid formation if practicable, through cover and scheduling practices, for example by minimising the length of time that acid sulfate soil is left in stockpiles as far as reasonably practicable, and/or the addition of neutralising compounds. Where PASS or AASS is identified, requirements and methods for managing soil must be in accordance with the Industrial Waste Management Policy (Waste Acid Sulfate Soils) (or any subsequently updated document issued by EPA), EPA Publication 1834 Civil construction, building and demolition guide and EPA Victoria Publication 655.1 Acid Sulfate Soil and Rock with consideration of the National Acid Sulfate Soils Guidance at https://www.waterquality.gov.au/issues/acid-sulfate-soils).	If any unknown acid sulfate soil is discovered, manage in accordance with this condition	No discovery of acid sulfate soil has been recorded in the corrective actions register (most recent event in the register is dated 28/02/23). Auditors did not sight any PASS. APA Environmental line list records the following Potential Acid sulfate soils (PASS) contaminated land: - KP8.40-8.43, located in existing easement. - KP42.72-42.74, located in existing easement. Technical Memorandum for Tame Street Drain conducted by Construction Sciences on the 3/05/23 has been sighted. The memorandum concluded that the under-boring spoil material reported no chemical or asbestos exceedances against relevant Victorian EPA guidelines (Waste Disposal Categories) and National Environmental Protection Measures (Commercial/Industrial Health and low-Density Residential Health). However, nickel results for all samples were reported above the applicable VIC EPA Waste Disposal Categories, meaning the material is best described as Category D Industrial Waste soils. Category D soil is a reportable priority waste. It must go to a place authorised to accept it, known as a lawful place. Category D materials can be: • Contained or reused onsite or on a project site • Treated to lower its contaminants so it becomes fill material • Sent to a landfill authorised to accept Category B, C or D soils.	Environmental corrective actions register APA Environmental Line List	Acceptable
F2.5	Environment Management Measures - Contamination C4	Minimise risks from contaminated groundwater Develop and implement groundwater management measures in accordance with EMM GW3.		See GW3.	See GW3.	Acceptable
F2.5	Environment Management Measures - Contamination C5	Minimise risks from vapour and ground gas intrusion Relevant sections of the Project must consider vapours and gases associated with any construction that interfaces with landfill sites (within 500 metres of the boundary of the waste) or contaminated areas. These include the sections of the alignment adjacent to the Bulla Landfill and Quarry (approx. KP 15 to KP 16). The spoil management measures referenced in EMM C1 must include requirements for assessment, monitoring and management of intrusive vapour, including potentially flammable or explosive conditions, in enclosed spaces within 500 metres of the Bulla Landfill and Quarry. The spoil management measures must address vapour risks associated with excavation of impacted soils, extraction of impacted groundwater, open excavations and stockpiles and gases. Specifically associated with the Bulla Landfill (KP 15-KP 16), this must include, where relevant: Securing of the excavation and stockpile area from the public and livestock including signage warning of open excavations Continuous monitoring of landfill gas conditions when any person is in the trench or during hot works or works that could potentially produce a spark within the trench. Setting of trigger values that require action within areas being trenched and including any temporary structures within the vicinity of the landfill. These must be developed in accordance with EPA Victoria Publication 788 Best Practice Management: Siting, design, operation and rehabilitation of landfills (landfill BPEM) and relevant occupational health and safety regulations and compliance codes. Contingencies to address any breaches of trigger values including temporary cessation of work until a reappraisal of risks is conducted, additional monitoring at a higher frequency, implementation of additional safety measures and or vapour extraction systems in response to the risk assessment.	If vapours or gases are identified, manage in accordance with this condition. Specifically associated with the Bulla Landfill (KP 15-KP 16), this must include, where relevant: - Securing of the excavation and stockpile area from the public and livestock including signage warning of open excavations - Continuous monitoring of landfill gas conditions when any person is in the trench or during hot works or works that could potentially produce a spark within the trench. - Setting of trigger values that require action within areas being trenched and including any temporary structures within the vicinity of the landfill. These must be developed in accordance with EPA Victoria Publication 788 Best Practice Management: Siting, design, operation and rehabilitation of landfills (landfill BPEM) and relevant occupational health and safety regulations and compliance codes. - Contingencies to address any breaches of trigger values including temporary cessation of work until a reappraisal of risks is conducted, additional monitoring at a higher frequency, implementation of additional safety measures and or vapour extraction systems in response to the risk assessment.	The area around the Bulla landfill site was not accessed during the field inspection. **Observation:** SCA advised that there is no evidence to support the consideration of the Bulla landfill in proximity to KP15-16.		Not applicable

F2.5	Environment Management Measures - Contamination C6	Manage chemicals, fuels and hazardous materials • Minimise chemical and fuel storage on site and store hazardous materials and dangerous goods in accordance with the relevant guidelines and requirements. • No chemicals, fuels or hazardous materials can be stored within the Conservation Areas (refer to the ELL in Appendix E). Refueling points must be located outside Conservation Areas where practical, or otherwise suitably bunded. • Comply with the Victorian WorkCover Authority and Australian Standard AS1940 Storage Handling of Flammable and Combustible Liquids and EPA Victoria publications 1834 Civil construction, building and demolition guide and Publication 1698: Liquid storage and handling guidelines – EPA Victoria. • Develop and implement management measures for dangerous substances, including: – Creating and maintaining a dangerous goods register – Disposing of any hazardous materials, including asbestos, in accordance with Industrial Waste Management Policies, regulations and relevant guidelines – Implementing requirements for the installation of bunds and precautions to reduce the risk of spills. • Develop and implement contingency and emergency response procedures to handle fuel and chemical spills, including availability of on-site hydrocarbon spill kits • Make spill kits available at all locations where machinery/plant are operating, refuelling points and fuel and chemical storage locations. • Limit the type and volume of liquid material (fuel, oil, lubricant) stored on-site for construction activities to only that which is required. Liquid material must not be stored within 50 metres of waterways.	Compliance with these commitments	Hazardous chemical and fuel storage was sighted at HDD sights KP 16 (Deep Creek), KP 3 (Melton Hwy) and KP 8 (Calder Hwy). All of these sites had chemicals and hazardous material stored within self bunded storage sheds. Spill kits were also present at all sites. **OFI:** KP8 (Calder Hwy HDD site) had engine cutting oil stored outside of a bund. Corrective actions register contains hydrocarbon spills (all non-reportable) and their respective corrective actions, due dates and status. KP43 (striped legless lizard habitat), KP42 (Merri Creek) and KP10.5 (minor waterway crossing (unnamed tributary of Jackson's Creek)) were attended by the auditors and did not have any storage of chemical, fuel or hazardous materials. KP42 (Merri Creek) and KP10.5 (minor waterway crossing) were visited by the auditors where no storage of hydrocarbons was present (i.e., greater than 50 m away from a waterway).		Opportunity for improvement
F2.5	Environment Management Measures - Contamination C7	Management of waste streams Implement the following measures to manage non-hazardous waste: - Manage wastes in accordance with the Part 6.4 of the EP Act and the EP Regulations. Undertake an assessment of potential wastes to be generated for the construction phase of the project that identifies waste elimination, reduction measures and opportunities for the re-use and recycle of construction waste. - Use appropriately designated/designed facilities to handle the identified waste streams including necessary segregation and storage requirements. This must include dedicated and labelled on site disposal locations, which segregates wastes into streams for offsite disposal or recycling. - Locate waste facilities away from natural drainage systems and flood plains. - Priority waste (such as waste oils, oily water mixtures, oily rags and oil filters, etc.) must be segregated, labelled and securely stored and transported to a facility authorised to receive these wastes (Lawful Place). - Classify and dispose of waste in accordance with the EPA Publication 1827.2 (Waste Classification Protocol), EP Regulations including by using a licensed waste contractor and completing Waste Tracker records for priority waste. - Carry out a toolbox meeting including specific awareness on chemical management/refueling and differences between waste types to facilitate correct segregation, storage and disposal. - Sufficiently enclose putrescible wastes for odour control (e.g. use of suitable bins). -No priority waste shall be comingled with other waste streams. -Document and implement a detailed process for monitoring, recording and tracking waste handling.	Compliance with several commitments regarding non-hazardous waste	Email correspondence between the Spiecapag Environmental Advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23 provides details of contaminated soil disposal that has occurred including date, job number, staff, time, hrs/qty, rates, item and description. **OFI:** Auditors sighted numerous chemical containers (20L diesel engine oil) in the general waste bin at KP3.3 (Melton Hwy HDD site).	Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23	Opportunity for improvement
F2.5	Environment Management Measures - Contamination C8	Management of hydrostatic test water Implement measures for management of hydrostatic testing water including: - Manage hydrostatic test water in accordance with the Environmental Reference Standard - Part 5 Environmental values of waters. - Sample water to be used for hydrostatic testing to determine water quality prior to use. - Prior to hydrostatic testing, pre-clean the pipeline to remove weld debris, dust and surface scale. - Reuse water where practicable to minimise the number of discharge locations and conserve water. - Only discharge hydrostatic test water discharge where water designated for release into the environment is of a quality that is not a risk of impacting human health or the environment. Relevant landholder(s) must be consulted prior to any discharge of hydrostatic test water to land. - Any discharge of hydrostatic test water must not result in soil erosion or sedimentation of land or water. Sediment control devices to remove suspended solids such as geotextile fabric filters must be used.		**Observation:** The auditors did not observe any hydrotesting take place during the audit. APA advised no hydrotesting has taken place to date (15/05/23). However, hydrotesting is recorded in the environmental aspects register (See hydrotesting section). APA advised (15/03/23) that EPA stated that clean water can be re-used on site and unclean water needs to be captured and stored and that the procedure is being developed. Email from the EPA to the SCA Environmental manager dated 26/01/23 states that the re-use of leak test water for dust suppression or irrigation is preferable to disposal to the stormwater system (no permission is required).	Email from the EPA to the SCA Environmental manager dated 26/01/23	Observation

F2.5	Environment Management Measures - Contamination C9	<u>Management of drilling</u> Implement measures for management of drilling to minimise the risk of contamination including: - Making spill kits or similar available to contain spills on land. - When HDD activities are in the vicinity of watercourses, ensure appropriate equipment (e.g. sediment curtains) is available to contain drilling fluids and prevent their migration downstream. - Disposing drilling fluids in accordance with EP regulations and Publications 1827 and 1968. - If HDD occurs through a potentially contaminated site, EPA Publications 1827.2 (Waste classification assessment protocol), 1828.2 (Waste disposal categories) and IWRG 702must be followed for classification and offsite disposal, ensuring any waste consigned for offsite disposal is sent to a Lawful Place. - Selecting appropriate inert and non-toxic drilling fluids.	Compliance with HDD activities in accordance with HDD plan, Drilling fluids management plan and site specific management plans (Jacksons Creek, Deep Creek)	The auditors visited several HDD sites (Melton Hwy, Calder Fwy, Deep Creek, Merri Creek), observing that spill kits were in place, sediment curtains and earthern bunds were in place, and that water-based muds were in use for drilling.		Acceptable
GHG						
F2.6	EMM - GG1	<u>Construction emissions</u> Reduce greenhouse gas emissions during construction so far as reasonably practicable by: a. Using low embodied energy materials where they are of comparable quality, utility, availability and cost b. Using fuel efficient plant and equipment where practicable during construction c. Using locally sourced materials, including those provided by suppliers, where they are of comparable quality, utility, availability and cost d. Reducing the amount of vegetation removal along the pipeline alignment as far as reasonably practicable e. Monitoring construction greenhouse gas emissions via assessment/monitoring processes f. Mulching trees for recycling g. Minimising as far as practicable the amount of fossil fuel-based explosives required during the construction phase.	Commit to reducing greenhouse gas emissions as far as is reasonably practicable	Diesel consumption is recorded in the monthly project report. Monthly Report 005 (1-31 January 2023) states that the January total was 215,049 L. Fuel consumption report for November 2022 has been sighted and states 65,033 L of fuel was used. The fuel consumption report for January 2023 has also been sighted and states 137,144 L was used in December and 213,894 L in January.	APPENDIX 4 of Monthly Report 005 – 1st to 31st January 2023 Fuel consumption report for November 2022 Fuel consumption report for January 2023	Acceptable
GROUND MOVEMENT						
F2.7	EMM - GM1	<u>Third party asset management</u> Identify and prove all third party services prior to construction. Liaise with asset owners for any asset within the construction easement to confirm asset clearance and other mitigation, protection or contingency requirements, including possible settlement monitoring at the railway crossings. Design utility crossings in accordance with asset owner requirements and construct the crossing in accordance with the design and third party conditions.	Prove all third party services	Incident register does not contain any incidents relating to unknown assets uncovered or assets damaged. SITE ACCESS APPROVAL NOTICE #FVCRM-4 from Metro (access start date: 28/04/2023 access end date 29/04/2023) for diggers rest has been sighted. SITE ACCESS APPROVAL NOTICE #FVCRM-3 (access start date: 25/03/23 access end date 24/04/23) for tame st drain has been sighted. Copy of the GWW agreement obligations spreadsheet verifies consultation has taken place with a third party. OFI: a 3rd party register would be a valuable tool in proving third party agreements.	SITE ACCESS APPROVAL NOTICE #FVCRM-4 & #FVCRM-3 Copy of the GWW agreement obligations spreadsheet	Acceptable
F2.7	EMM - GM2	<u>Design and construction to be informed by geotechnical and hydrogeological conditions</u> Detailed design and construction must be informed by the geotechnical and hydrogeological investigations of ground and groundwater conditions including in relation to: -the soil and rock expected to be encountered during all excavations -the potential presence of reactive soils -the potential presence of sodic and dispersive soils -the potential locations and extent of groundwater drawdown Additional investigations must be undertaken if existing investigations are insufficient.	Inform design based on hydrogeological and geotechnical investigations	**<u>Observation:</u>** Auditors have not reviewed any evidence to support this condition.		Observation

F2.7	EMM - GM3	<u>Management of trench stability: support and duration</u> Carry out trench excavation works in accordance with the requirements of the Safe Work Australia Code of Practice: Excavation Work (2018) and WorkSafe Victoria Compliance Code: Excavation (2019). Where potentially unstable ground may compromise the stability of the trench, management measures are to be developed by a suitably qualified geotechnical engineer. In addition, the time that trenches and bell holes remain open will be minimised as far as reasonably practicable. As a general rule, trenches should not remain open for longer than 3 months and should comply with SafeWork Australia (2018). Should failure occur, contingency response actions may include, for example, methods for temporary shoring and the removal, replacement, and rehabilitation of the disturbed soil.	Ensure that trench stability is upheld via appropriate design, construction and ensure that timing of trench opening is managed.	The auditors did not observe any active trenching during the field inspection. Long sections of the construction RoW are located within very rocky terrain, so trench stability did not appear to be a key concern. For example, at KP2 where boring under a park was taking place and at KP5 where pipe coating was observed taking place within a bell hole, no trench shoring was in place. The corrective actions register and incident register do not contain any reports of trench collapse (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	Corrective Actions Register (pdf) Incident register (excel spreadsheet)	Acceptable
F2.7	EMM - GM4	<u>Management of trench erosion, consolidation and swelling</u> Implement measures to manage soil dispersion, erosion, consolidation and swelling risks including: Implementation of erosion and sediment control measures in accordance with EPA 1834 guidelines (2020) and is to be informed by the International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control, Appendix P – Land Based Pipeline Construction (2008). This includes the use of trench breakers installed at regular intervals along the trench excavation where necessary (for example, near to existing slopes and where shallow groundwater tables exist) to minimise ongoing erosion caused by altered water flow regimes as a result of trench construction. Compaction of the trench backfill as per APA's performance requirement and contractor's construction requirements. Degree of compaction and design of backfill to take into account design load limits on the pipe and density and permeability of surrounding soil. Routine inspection and monitoring of the construction area must be undertaken to identify any issues such as ongoing erosion, ground movement, slope creep or other adverse effects on land use. Management, monitoring and identification of issues may be in accordance with IECA Best Practice Erosion and Sediment Control (2008). Additional erosion control measures in proximity to waterways are contained in EMM SW4. Additional measures for rehabilitation and monitoring of trenched waterways are contained in EMM SW3.	Implement erosion and sediment control measures in accordance with EPA guidelines and IECA - Appendix P	APA Weekly inspection reports contain the following checks: - Erosion and sediment controls are in place and are operating - Any evidence of erosion on the RoW? - Erosion and sediment controls are in place and are operating post backfill/reinstatement. APA weekly inspection report dated 23/01/23 at 21–47 Gunns Gully Rd flags that sediment fencing needs to be repaired and speicapag will be alerted. All of the weekly inspection checklists that have been sighted have not been within areas of reinstatement.	APA Weekly inspection reports APA weekly inspection report dated 23/01/23 at 21–47 Gunns Gully Rd	Acceptable
F2.7	EMM - GM5	<u>HDD trenchless bore management</u> Use trenchless bore support (such as a suitable drilling mud or bentonite) to temporarily support the bore during the trenchless activities in accordance with the guidelines for horizontal directional drilling, microtunnelling and pipe jacking (ASTT, 2009). Prior to construction, undertake a detailed hydrofracture risk assessment where necessary to confirm that the risk of blow-out is low. Prepare and implement a volumetric drilling fluid tracking program with defined threshold levels for fluid loss, stop works and further investigation and restart criteria. Monitor and manage support fluid to effectively minimise ground deformations and risk of bore collapse in unstable ground to reduce the risk of damage to nearby sensitive receptors as well as the potential for frac-out.	Compliance with HDD activities in accordance with HDD plan, Drilling fluids management plan and site specific management plans (Jacksons Creek, Deep Creek)	Observation: Auditors have not reviewed any evidence to support this condition i.e., hydrofracture risk assessment. However, HDD related checks have been sighted in Deep Creek daily inspections dated 19th and 20th of December 2022.		Observation
F2.7	EMM - GM6	<u>Confirmation of ground risk</u> For sites where there is insufficient or no geotechnical information, confirm the viability of proposed temporary works (i.e. choice of trenchless method) by completing additional geotechnical investigations. Additional investigations may include shallow surface geophysical methods, trial pitting or drilling as appropriate (subject to environmental or access constraints). Take into account any new geotechnical information and review measures for trenchless construction to minimise the risk of harm so far as reasonably practicable (for example excessive settlement, damage to assets). Relevant sites include Beatty's Road, Morefield Court, Sunbury Road, Oaklands Road, Donnybrook Road (West).Carry out further utility proving works where information is not currently available at the crossing location (including at the Donnybrook Road (West) crossing).	Inform design based on hydrogeological and geotechnical investigations	**<u>Observation</u>**: Auditors have not reviewed any evidence to support this condition.		Observation

F2.7	EMM - GM7	<u>Preparation and implementation of sodic and Dispersive soil management measures</u> Develop and implement a Sodic and Dispersive Soils Management Plan (SDSMP). The SDSMP is to be prepared by one or more suitably qualified professionals with relevant expertise, including soil science and geotechnical expertise or CPESC, for acceptance by DEECA for inclusion in an EMP under the Pipelines Act prior to commencement of clear and grade works. The SDSMP must include: A description of the existing site conditions, including: – Review of completed soil investigations and site walkover by a suitably qualified soil scientist/geologist/CPESC – extent of sodic and dispersive soils based on topsoil and subsoil samples in the works area – land gradient – erosion risk mapping – the extent of any existing erosion, landslip or other land degradation Requirements for soil management practices (including fill) in areas identified as medium to high dispersion risk on the Environmental Line List, with consideration of anticipated sodic and dispersive soil exposure, including: – Any treatment necessary to manage soil while works are undertaken; – The management, volume and location of any stockpiles (additional to requirements of existing EMMs); – Vehicle access and movement within the construction area (additional to requirements of existing EMMs); – The management of drainage and dewatering during all stages of construction; – Monitoring and reporting processes; – Rehabilitation of disturbed areas, including any treatment to manage the soil post construction (additional to requirements of existing EMMs); – Post-construction monitoring and management requirements; – Any awareness and supervisions processes for construction contractors to ensure compliance with the SDSMP. Management measures must be proportional to the level of risk identified by the additional site investigations and in general accordance with the guidelines contained within Best Practice Erosion and Sediment Control, Appendix P (IECA, 2008) where applicable.The Sodic and Dispersive Soils Management Plan is to be prepared in consultation with Melbourne Water, and to the satisfaction of DEECA. Application of EMM GM4 is also considered to assist in the management of dispersive soils.	Prepare and implement a SDSMP that is reasonable and practicable and reflective of the risk associated with the reinstatement of dispersive soils.	Sodic And Dispersive Soil Management Plan (18035-PL-CN-0011) Rev 0, reviewed and Accepted (Code 1) by APA dated 30/09/22 has been sighted. The SDSMP contains a comment that DELWP (now DEECA) has accepted the plan. The SDSMP was prepared by a Suitably Qualified Person Soil Scientist (ESSA) from Environmental Soil Solutions Australia Pty Ltd and contains the provisions outlined in column C within the 'Table Compliance Statements from SDSMP - WORM (EMM7 Requirements)'. Observation: The auditors have not sighted any evidence that MWC was consulted in the creation of the SDMP.		Acceptable
LAND USE						
F2.8	EMM - LU1	<u>Impacts to Precinct Structure Plans (PSPs) and growth areas</u> Minimise impacts as far as reasonably practicable to PSPs and growth areas by providing for consistency with approved and PSPs that are yet to be approved. This must include: Co-locating the alignment with other utility and transport infrastructure projects to avoid impacts on net developable land where practicable Where the pipeline has not been provided for in an existing PSP: designing the pipeline in accordance with AS 2885 with consideration to current land use Incorporating the proposed easement and notification area based on the Area of Consequence into any future PSPs along the alignment Rehabilitating land within existing PSPs in accordance with EMM LU2 Providing for future uses along the pipeline (e.g. shared use paths) in accordance with the APA Site Planning and Landscape National Guidelines (APA 2020).		**<u>Observation:</u>** auditors have not reviewed any evidence for this commitment, though APA advised that the pipeline was being partially constructed alongside another pipeline easement.		Observation
F2.8	EMM - LU2	<u>Continuation of existing land uses</u> Construct and operate the Project in accordance with EMM AQ1, AQ3, NV1, NV2, NV3, NV4, NV5 to minimise amenity impacts and support the continuation of existing land uses during construction and operation phases. Rehabilitate land in accordance with this CEMP and agreements with landowners. Continuation of agricultural land uses must be managed in accordance with EMM S2. Inform landowners and occupiers of the construction commencement, and details of the proposed construction programme, in accordance with the Project Consultation Plan.		See EMM AQ1, AQ3, NV1, NV2, NV3, NV4, NV5 and S2. This audit did not take place during the rehabilitation stage (this is the scope of the next audit). **<u>Observation:</u>** Auditors did not review consultation material or records.		Acceptable
F2.8	EMM - LU3	<u>Impacts to land tenure and access</u> Provide compensation for the reservation of the easement and acquisition of land for the Project in accordance with Pipelines Act 1985 and Land Acquisition and Compensation Act 1986. Consult relevant stakeholders in relation to construction access and operational activities in accordance with the Project Consultation Plan and Project EMMs S3 and S5.		See S3 & S5. **<u>Observation:</u>** Auditors have not reviewed any evidence to support this condition i.e., records of consultation and compensation material.		Observation

F2.8	EMM - LU4	Interruptions to roads and railways Develop and implement Traffic Management Plans in accordance with EMM S3. Use trenchless construction methods to avoid disruptions to major roads and railway lines as far as reasonably practicable	Prepare a traffic management plan for open cut road crossings and ensure railway crossing permits have been obtained prior to commencement of work.	See S3.		Acceptable
F2.8	EMM - LU5	Consult with relevant landholders regarding property-specific measures to implement during construction and operations including: • Access across the construction area during construction • Stock management • Biosecurity.	Prepare comprehensive property management plans to capture landholder requirements.	PROPERTY MANAGEMENT PLANS WPT 059, WPT 067 and WPT072 have been sighted and contain access across the construction area during construction and stock management measures. **Observation:** biosecurity measures are not discussed within the plans sighted, but this may be because they were not of concern to the landholders.	Property Management Plans WPT 059, WPT 067 and WPT072	Observation
F2.8	EMM - LU6	Undertake all reasonable steps to enter into an agreement with each landholder on fair and reasonable terms. Agreements must include commitments to agreed measures to minimise the impact of the Project on landholder activities.	Negotiate access in good faith.	Property Management Register has been sighted, with records showing whether or not the PMP or PMP agreement has been signed. Property Management Plans have also been sighted (WPT059, WPT067 & WPT072)	Property Management Register Property Management Plans	Acceptable
F2.8	EMM - LU7	Compile and maintain a schedule of Landholder Agreements, documenting actions to be carried out on each property.	Prepare detailed property management plans and implement a method of identifying/registering land based issues that require to be rectified	Property Management Plans have been sighted (WPT059, WPT067 & WPT072). **OFI:** APA advised that no schedule/register is used to record actions to be carried out on each property.		Minor non-conformance
F2.8	EMM - LU8	All third party services within the easement, including on farm infrastructure, must be identified and marked on the ground in advance of open trench construction activities.		Auditors did not sight any trenching at the time of the audit, therefore, did not observe any third party services marked on the ground.		Not applicable
F2.8	EMM - LU9	Manage interfaces with all identified third party services and water lines so that their operation can continue during pipeline construction, wherever reasonably practicable.	Ensure 3rd party assets are acknowledged and agreements are implemented as required to manage operation during WORM construction	SITE ACCESS APPROVAL NOTICE #FVCRM-4 from Metro (access start date: 28/04/2023 access end date 29/04/2023) for diggers rest has been sighted. SITE ACCESS APPROVAL NOTICE #FVCRM-3 (access start date: 25/03/23 access end date 24/04/23) for tame st drain has been sighted. Copy of the GWW agreement obligations spreadhseet verifies consultation has taken place with a third party. **OFI:** a 3rd party regsiter would be a valuable tool in prooving third party agreements.		Opportunity for improvement
F2.8	EMM - LU11	Progressively commence and complete reinstatement as soon as reasonably practicable post-construction	Plan and execute progressive reinstatement	N/A - post-construction audit		Not applicable
F2.8	EMM - LU12	Reprofile the construction area to original contours or to new, stable contours (where it is not reasonably practical to re-profile to original contour) in line with contractor construction specification.	Ensure reprofiling and contouring of reinstatement	N/A - post-construction audit		Not applicable
F2.8	EMM - LU13	Apply soil amelioration and fertiliser where required as determined by soil assessments and tailored to rehabilitation requirements in consultation with the landholder.	Ensure appropriate amelioration and fertiliser application	N/A - post-construction audit		Not applicable
F2.8	EMM - LU14	Compact the trench backfill as per APA's performance specification and contractor's construction specifications. Degree of compaction to take into account design load limits on the pipe whilst minimising changes to pre-construction groundwater conditions.	Compact trench backfill	Auditors did not witness backfilling in action. Sections of trench that had been backfilled appeared to be suitability compacted, with evidence of tyre tracks over the backfill area for compaction, and no evidence of trench slumping.		Not applicable
F2.8	EMM - LU15	Implement compaction relief by ripping or scarifying areas of the construction area which have been compacted by construction activities. Particular attention must be given to areas subject to regular watering and high traffic volume.	assess compaction and scarify areas that have been subject to high levels of compaction.	N/A - post-construction audit		Not applicable
F2.8	EMM - LU16	Reinstate all access tracks, fences and gates post construction in consultation with landholders and any relevant third parties.	Reinstatement to be undertaken in consultation with landholders and third parties as relevant.	N/A - post-construction audit		Not applicable
F2.8	EMM - LU17	Install permanent access gates post-construction, where required at fence intersections and for access to MLV compounds which will be completely fenced.	compliance with this commitment	N/A - post-construction audit		Not applicable

F2.8	EMM - LU18	Where seeding is adopted to facilitate prompt revegetation and soil stabilisation, consider the following principles: • Formulate seed mixtures with consideration of the vegetation composition of the areas adjacent to the construction area and in consultation with the relevant landholder. • Sterile seed stock (cover crop) may be used to provide short term surface stability. • Disperse seed evenly dispersed over the disturbed area. • Seeding to take place as soon as reasonably practicable after reinstatement of the soil profile. • A suitable fertilizer may be applied depending on soil conditions and any landholder requirements.	Adopt principles into the reinstatement planning process	N/A - post-construction audit		Not applicable
F2.8	EMM - LU19	Monitor the condition of the construction area and other disturbed areas post construction with remedial measures undertaken, as required, with the aim that all disturbed areas are re-profiled to a stable landform consistent with original contours and drainage lines, or proposed new stable contours, and vegetated with a self-sustaining, non-pest species groundcover.	Ensure reinstatement complies with this commitment	N/A - post-construction audit		Not applicable
F2.8	EMM - LU20	Implement reasonable and practicable measures to avoid impacts to landholder national vendor declarations and other requirements under applicable livestock production assurance programs due to the use of herbicides, pesticides and other chemicals during construction and operations. Such measures must be informed by consultation with Meat and Livestock Australia.	Identify properties where additional biosecurity or chemical usage may be prohibited.	**Observation:** Auditors have not reviewed any evidence that supports this condition (i.e., the measures that Meat & Livestock Aus have agreed to).		Observation
LANDSCAPE & VISUAL						
F2.9	EMM - LV1 & LV2	Avoid removal of trees that provide screening to private property residences as far as reasonably practicable. Through detailed design and selection of construction methods identify and demarcate trees to be retained (within the construction area) prior to commencement of construction. Protect trees to be retained in accordance with AS-4970 Protection of trees on development sites. Prior to construction, undertake an arborist report on trees that screen private residences from road reserves to be retained immediately bordering the construction area where trimming would be required. The arborist assessment must consider any potential impacts on trees from proposed construction activities and recommend tree protection measures to be adopted in accordance with AS-4970 Protection of trees on development sites.	Maintain screening trees where possible. Ensure that trees are retained in accordance with the tree management plan and AS4970	Tree Management Plan- reviewed and Accepted (Code 1) by APA (18035-PL-HSE-0016) Rev 1, dated 27/10/22 has been sighted. Observation: Auditors have not reviewed the arborist assessmen/report on screening trees and are unable to determine if the conditions in column C have been met.	Tree Management Plan- reviewed and Accepted (Code 1) by APA (18035-PL-HSE-0016, Rev 1, 27 Oct 2022).	Observation
F2.9	EMM - LV3	Remove machinery, materials and temporary infrastructure from construction area as soon as it is no longer required. Keep construction laydown areas tidy and minimise dust in accordance with EMM AQ1.	Ensure construction schedule is maintained. Ensure temporary infrastructure is managed, maintained and removed when no longer required.	Auditors did not sight any infrastructure that was not in use or witness any untidy sections of the RoW. Dust did not appear to be an issue during the field inspection. The following complaints regarding tidiness of laydown areas and dust are in the complaints register: - Complaint received 23/2/23 'Dust on Parkland Cres. getting into cars and properties' - Complaint received 19/04/23, summarised as: • The area has been generally left in bad condition and the workers were disrespectful. • Her nature strip has now gone. • Their letterbox has been knocked over and propped back up and left against the fence. • The same thing has happened to other letterboxes in the street. • Damage was done to the top of their fence, but they have already had this fixed. - Complaint received 9/05/23 - Resident complained about 'mess' on the road around the work area and safety issues with overtaking trucks.		Minor non-conformance
F2.9	EMM - LV4	Manage light generated during night construction activities such as HDD, in general accordance with the requirements in Australian Standard AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting. Design lighting to minimise off-site light spill as far as reasonably practicable.	Minimise light generation, use and spill when utilising outdoor lighting.	Auditors did not witness any outdoor lighting in operation during the field inspection (which was undertaken during daylight hours). Light towers were only sighted at the Deep Creek HDD site, where they were pointed inwards towards the construction footprint and unlikely to cause unreasonable light spill. Daily Checklists provided for Deep Creek (HHD sight) check the presence of artificial lighting (both examples contain none).	Daily checklist for Deep Creek dated 20.12.2022 and 19.11.2022	Not applicable
F2.9	EMM - LV5	Where trees and shrubs within the approved construction area are lost and affect public places or existing screening of private residences from road reserves, replace trees and shrubs where practicable and reasonably requested, subject to any necessary approvals being granted, in accordance with a planting and remediation plan prepared under LV7.	Replace any screening trees removed as requested by landholder/land manager	N/A - post-construction audit		Not applicable

F2.9	EMM - LV6	Introduce trees and shrubs to screen the mainline valve from roads and residences, if requested by affected landholders, does is not a threat to pipeline integrity and subject to any necessary approvals being granted in accordance with a planting and remediation plan prepared under LV7.	Screen main line valve locations as requested/ as appropriate	N/A - post-construction audit		Not applicable
F2.9	EMM - LV7	Develop and implement a planting and remediation plan (applicable to screening trees directly impacted) where planting of trees and shrubs are proposed, in consultation with any affected landowners where requested. Planting will be undertaken in accordance with relevant bushfire management overlays for the area and with consideration of APA requirements for restricted uses within an easement and asset protection zones. The plan must outline a monitoring and defects period for the planting and remediation. The plan must be reviewed by the responsible authority (if planting on Crown land) and affected landholder.	Planting and remediation plan (incorporated into reinstatement plan)	N/A - post-construction audit		Not applicable
SAFETY						
F2.10	EMM - SA1	<u>Pipeline, MLV and compressor works safety standards</u> Design, construct and operate the pipeline, MLV and compressor works in accordance with AS/NZS 2885, including: Completion of identification/assessment of threats and mitigating strategies as part of detailed design Maintenance and inspections of the pipeline in accordance with APA procedures and AS/NZS 2885. Maintain and inspect the MLVs and the Wollert compressor station at a frequency in accordance with APA's monitoring regime and procedures. This must include vegetation management, valve and compressor operation and corrective maintenance	Inspect and maintain MLV sites and Wollert Compressor	N/A - not part of the scope for this audit.		Not applicable
F2.10	EMM - SA3	<u>Fire protection</u> Develop and implement a Health and Safety Management Plan that requires: • Provision of active fire protection and suppression for liquid fires in the turbine enclosure • Storage of diesel in storage tanks in accordance with AS 1940:2017 and provision of foam for firefighting purposes at diesel stations and implementation of routine monitoring to manage the risk of any fire events. Manage diesel in accordance with the HSEMS, including the creation of Emergency Response Plan(s).	Ensure that Health and Safety Man Plan includes provision for fire protection and suppression for liquid fires and storage of diesel. Ensure diesel storage and usage is included in the HSEMS & Emergency Response plan.	The Health & Safety Management Plan has been sighted and requires storage of diesel in storage tanks in accordance with AS 1940:2017 and provision of foam for firefighting purposes at diesel stations and implementation of routine monitoring to manage the risk of any fire events. APA Emergency Response Plan has been sighted. Self-bunded diesel storage units and self bunded storage shed was present at KP 16.8. Self bunded storage shed and self-bunded diesel generators were present at KP 3.3 and 8.8. **<u>Observation:</u>** The plan does not specifically discuss diesel storage and usage. Fuel use is discussed where bushfires are a threat.	Health and Safety Management Plan (18035-PL-HSE-0003, Rev 3, 15 July 2022) APA Emergency Response Plan (18035-PL-ER-0002, Rev 0, 19 Sept 2022)	Acceptable
F2.10	EMM - SA4	<u>Emergency response plans</u> Develop and implement emergency response plans, such as for spills, for both the construction and operations phases of the Project.	Prepare and implement emergency response plan for construction (operation not part of this scope).	**<u>Observation:</u>** Construction Safety Management Plan (18035-PL-HSE-0010) has not be reviewed by the auditors.		Observation
F2.10	EMM - SA5	<u>Bushfire Management Plan</u> Review and update the existing APA Bushfire Management Plan to consider the new infrastructure introduced by the WORM Project in consultation with relevant stakeholders including the Country Fire Authority and Fire Rescue Victoria.	Prepare and implement a Bushfire Management Plan.	Bushfire Management Plan has been sighted. APA advised that a review and update of the existing version will occur post-construction.	Bushfire Management Plan (320-PL-ER-0016, Rev 1, 4 Sept 2020)	Acceptable

F2.10	EMM - SA6	Traffic Management Plan Develop and implement a Traffic Management Plan(s) (TMP). The TMP(s) should be prepared with input from the relevant Responsible Authority and be approved by the relevant road authorities and include provision for: - Consultation with the Department of Transport as early as practicable to identify works that have the potential for a high impact on the road network and measures to manage such impacts. - Monitoring on-going traffic impacts associated with the proposed pipeline. - Determination of preferred travel route options based on minimising the impact on local roads and having preference for B-double approved roads. - Inspection of existing road conditions. - Assessment of relevant existing intersection ability to facilitate large truck turning movements. - Management of roads at the time when boring activities are to occur underneath. - Traffic measures required as a result of partial road closures to limit travel disruptions - Temporary traffic control measures required at access track entrances, as required - Notification to local stakeholders of timing of traffic impacts, particularly regarding traffic impacts through private land - Restoration of road surface post-pipeline construction, as necessary. This includes pre- and post-construction surveys of roads likely to be impacted by construction activity - Measures to manage dust/dirt impacts as a result of construction traffic. -Management of waste to/from the construction area as a result of construction activities. - Measures to avoid public transport impacts (if any).	Prepare a Traffic Management Plan which includes detail listed within this commitment of the CEMP with input from responsible authorities.	Traffic Management Plan - reviewed and Accepted (Code 1) by APA has been sighted. **Observation**: the traffic plan does not explicitly demonstrate Consultation with the Department of Transport or mention Restoration of road surface (if impacted from construction) During the field inspection, active traffic management was sighted at Donovan's Lane off the Hume Hwy. **Observation:** Regarding implementation of the TMP, traffic checks are not included within the daily/weekly inspection reports provided, making this condition difficult to audit.	Traffic Management Plan (18035-PL-HSE-0013, Rev B, 16 Oct 2022)	Observation
SOCIAL						
F2.11	EMM - S1	Reduce community disruption: Construct the Project in accordance with EMMs AQ1, AQ3, B7, LV1, LV2, LV5, NV1, NV2, NV3, NV4, NV5, NV6, and NV7 to minimise risks of harm from noise, vibration, air quality, and landscape and visual amenity impacts to residents directly adjacent to the alignment, community facilities and recreation areas as far as reasonably practicable.	Manage community disruption in accordance with Noise and Vibration Management plan and dust suppression commitments. Incorporate community consultation into the Project Consultation Plan and the Communications and Engagement Activity Management Plan	See AQ1 & AQ3. See B7 - relates to post construction (rehab). See LV1 & LV2. See LV5 - relates to post construction (rehab). See NV1, NV2, NV3, NV4, NV5, NV6 & NV7.		Acceptable
F2.11	EMM - S2	Minimise property impacts Minimise the risk of property damage due to construction of the Project by carrying out construction activities in accordance with EMM LU3 to LU20.	Ensure property impacts are understood and communicated to landholders.	PROPERTY MANAGEMENT PLANS WPT 059, WPT 067 and WPT072 have been sighted. Chapter 7 of the PMPs require an AUTHORISATION AND AGREEANCE that verifies property impacts are understood and communicated to landholders. Property register has been sighted and indicates few properties have signed. **OFI:** do not create conditions that simply refer to other conditions.	See EMM LU3-LU20	Not applicable
F2.11	EMM - S3	Community and residential access and connectivity The following must be implemented to manage potential impacts to local access roads during construction: • Approved TMPs to mitigate risks to workers and the public arising from the movement of construction vehicles on public roads and at site access points. • Stakeholder and communications arrangements in accordance with the Project Consultation Plan (Refer to EMM S6). • Measures to prevent impacts to emergency services access.	Ensure the TMP, Project Consultation Plan are implemented effectively. Ensure the Emergency response procedure includes provision for emergency vehicle site access.	TMP is place (see EMM SA6). Stakeholder and communication arrangement are in place (see EMM S6). Auditors did not sight any measures that may prevent access to emergency services during the audit.		Acceptable
F2.11	EMM - S4	Land access Prior to any works commencing on a property, develop agreements with the landowners and occupiers regarding the use of existing roads or tracks, the selection of new access routes and any property-specific measures to implement during construction and operation, such as: • Access across the construction area • Relocation / duplication of facilities and infrastructure. No access by APA or construction contractors is to be gained to properties outside of the construction area boundary unless undertaking survey or property management activities, either with prior agreement of the land owner or otherwise exercising statutory powers to undertake the works. Inform landowners and occupiers of the construction commencement, and details of the proposed construction program, in accordance with the Project Consultation Plan (EMM S6)	Coordinate and communicate site access provisions and delineated construction corridor. Ensure directly affected landholders, occupiers and third parties are engaged and notified appropriately.	Property Management Plans WPT 059, WPT 067 and WPT072 have been sighted. Chapter 7 of the PMPs require an Authorisation and Agreeance that verifies property impacts are understood and communicated to landholders. Property register has been sighted and indicates few properties have signed. Project GIS has been sighted, detailing the construction footprint. During the field inspection, the audits did not notice any access to property outside demarcated areas.	Property Management Plans WPT 059, WPT 067 and WPT072 Project GIS Property register (excel spreadsheet)	Acceptable

F2.11	EMM - S5	Source workers, supplies and services during construction from the regional study area as far as reasonably practicable. Support regional employment and purchasing by requiring the main construction contractor to detail mechanisms to provide for regional employment and purchasing during the tender phase. The adequacy of this plan must be a consideration in the selection of the preferred construction contractor. Once engaged, contractors must be required to report on performance against set criteria.	Preparation and implementation of a Local Industry Participation Plan (LIPP)	N/A - outside the scope of this audit.		Not applicable
F2.11	EMM - S6	Develop and implement an internal Project Consultation Plan to facilitate ongoing consultation with relevant stakeholders throughout the Project's planning and construction. The Plan must include: The approach to communicating and engaging with the community and potentially affected stakeholders in relation to: – The likely timing and nature of the Project's construction activities and potential impacts. – Changes to transport conditions. -The mechanisms and timing for communicating Project updates for all stakeholders through multiple channels (website, newsletters, local media) -Liaison with municipal Councils, where appropriate, to gain insight into the most appropriate consultation methods for specific communities or community groups. -The approach for communicating and engaging with vulnerable groups, including community groups, culturally and linguistically diverse groups, and residents who do not speak English. The approach should outline circumstances under which translation services will be provided. -Measures to evaluate the effectiveness of the communication and engagement under the Plan. -Arrangements for receipt and management of feedback and complaints, including timeframes for responding to complaints.	Preparation and implementation of an internal Communications and Engagement Activity Management Plan	CONSULTATION PLAN Western Outer Ring Main Project, Rev 3 dated 12/05/21 has been sighted (18035-PL-LH-0001). **OFI:** The plan does not contain all the provisions required of the commitment.		Opportunity for improvement
SURFACE WATER						
F2.12	EMM - SW1	Managing runoff from adjacent construction areas, discharge from dewatering activities and spills/leaks Implement measures to minimise risks of harm so far as reasonably practicable on downstream environments due to construction activities and potential runoff. This is to be in accordance with EPA Publication 1834: Civil construction, building and demolition guidance, Publication 1894: Manage soil disturbance, Publication 1895: Manage stockpiles, Publication 1896: Manage how you work within or adjacent to waterways and Publication 1897: Manage truck and other vehicle movement, including: -Where practicable, construct all trenched crossings of ephemeral watercourses during no or low flow conditions and reinstated as soon as reasonably practicable. -Form discrete stockpile segments (i.e. rather than a continuous row of stockpile materials) to prevent causing water to pond on the upstream side. -Where drainage lines intersect the construction area, place flow diversion measures upstream of soil stockpiles. -Direct surface water runoff from external catchments through regular gaps in soil stockpiles where erosion and sediment controls are installed to allow runoff to pass over the construction area at a controlled location without causing erosion. -Install flow diversion measures, such as berms, sediment fences and temporary trench breakers, on steep slopes to disperse surface water runoff without causing erosion.	Incorporate all truck and vehicle movement commitments into Contractor CEMP	Auditors visited Merri Creek (water crossing) during low flow and unnamed tributary of Jacksons Creek with no flow. Stockpiles that were sighted the auditors were not continuous i.e., discrete. Auditors sighted sediment fencing at both sites. Trenching had not occured at both sites at the time of the audit. Auditors sighted bunding around the HDD site at Deep Creek. The environmental aspects register notes that dewatering has occured at Merri Creek (post audit). The auditors have not sighted any evidence of contaminated trench water.		Acceptable

		Implement erosion and sediment controls for the construction area with reference to International Erosion Control Association Best Practice Erosion and Sediment Control, Appendix P – Land Based Pipeline Construction (IECA, 2008). Monitor weather forecasts to manage the pipeline works with the intent of avoiding open trench works at each individual waterway crossing when high rainfall events are expected. Manage non- contaminated groundwater and surface water run-off that enters the open trenches and bell holes in accordance with EPA Publication 1834 Civil Construction, building and demolition guide (November 2020). Where surface water run-off and rainfall collect in trenches and is to be dewatered, test turbidity, salinity and pH prior to discharge to land. Treat water if parameters exceed the objectives in the Environment Reference Standard. Treatment options include, but are not limited to filtration, and the addition of flocculants or pH buffers as appropriate. Discharge to land (i.e. grass filtration) must not occur within 100 metres of watercourses. Where the water cannot be treated to the required standard it is to be removed from construction area for disposal in accordance with EPA Publication 1828.2. Potentially contaminated trench water is to be assessed and managed in accordance with NEPM ASC, NEMP v2.0, EPA Publication 1828.2 and other EPA guidance as appropriate.				
		Manage any spills and / or leaks during construction in accordance with EMM C6. Implement measures to minimise impacts due to discharge from Trenchless construction sites including, where reasonably practicable: Install a combination of earth bunds and drainage channels around the upper edges of trenchless drilling sites to divert runoff away from the site and prevent it from mixing with material used during drilling operations Install sump pits at the bottom of trenchless drilling sites to capture any runoff from drilling compound and construct earth bunds around the sump pits to prevent spillage from entering the waterway Construct bunds around all facilities that are involved in the HDD activities including around slurry operations and pumping of drilling mud Manage trenchless bores and drilling fluids in accordance with EMM GM5 and EMM D1.The contents of sump pits are to be removed with residual drilling fluids for disposal in accordance with EMM C9.				
F2.12	EMM - SW2	<u>Waterway and floodplain function (construction)</u> Implement measures to minimise impacts so far as reasonably practicable to the function of waterways and floodplains during construction and allow flow to be conveyed across the construction area in accordance with EPA Publication 1896: Manage how you work within or adjacent to waterways, including: • Form discrete stockpile segments (i.e. rather than a continuous row of stockpile materials) to prevent causing water to pond on the upstream side. • Provide regular gaps in stockpiles to allow flood water to pass through. • Avoid stockpiling material near waterways. Material must be located away from the top of banks so that there is no restriction to the flow conveyance area. • To maintain the waterway and floodplain function, the Project must compact soil, scarify and re-profile the land to original contours as far as reasonably practicable. • Provisions for diverting unexpected flow on all waterways where the crossing will be constructed by open cut trench. The measures may scaled down for minor waterways, with a minimum requirement to have resources on site to respond in changed weather conditions	Ensure 'Waterway and floodplain' sections are defined prior to construction to enable effective management of stockpiles. Incorporate management measures into site specific management plans	Melbourne Water CREEK CROSSING APPROVAL dated 2/12/21 has been sighted, the approval is satisfied with the Minor Watercourse Crossing Procedure which contains management of stockpiles across Kalkallo Basin. Jacksons Creek, Deep Creek and Merri Creek SSEMPs contain stockpile management provisions and have been sighted. (See relevant plans within this spreadsheet). Stockpiles were sighted at Merri Creek (KP42) a distance away from the waterway.	Melbourne Water CREEK CROSSING APPROVAL (Appendix D of Minor Watercourse Crossing Procedure) SSEMPs Sight inspection (see photo xx)	Acceptable

F2.12	EMM - SW3	<u>Site Rehabilitation measures for disturbance caused by open cut trench construction</u> Implement site rehabilitation measures to minimise the impacts to waterway heath as far as reasonably practicable and in accordance with EPA Publication 1896: Manage how you work within or adjacent to waterways including: Compact soil, scarify and re-profile the land to original contours to maintain the waterway and floodplain function Restrict any operational works to the easement only, with landholder requirements determined prior to commencement of works. Restore waterway bed and banks as soon as reasonably practicable after pipe installation and backfilling works Restore banks by grading (nominally 1:3 grade. and revegetation), and smoothly transition to the undisturbed banks (refer to APA standard drawing no. 530-DWG-L-5008) Restore waterway bed to preconstruction profile, and smoothly transition to the upstream and downstream undisturbed bed condition Provide temporary protection such as geofabric or erosion matting on bed and banks to prevent erosion until vegetation has established	Incorporate rehabilitation requirements into site specific management plans	N/A - post-construction audit		Not applicable
		Carry out routine inspections (e.g. minimum every six months plus potentially following any significant flood event) to monitor effectiveness of civil rehabilitation works (earthworks and rock beaching works) during the first 24 months post-construction. Where monitoring identifies defects or deficiency in civil rehabilitation works, appropriate rectification measures will need to be implemented. Establishment of vegetation cover within the first three months post construction. Following establishment of vegetation/ground cover, routine maintenance to be undertaken for a period of 24 months to monitor and manage successful reinstatement. Include site specific application of rock beaching protection as part of site rehabilitation where required.				
F2.12	EMM - SW4	<u>Control measures for open cut trenching construction and watercourse management</u> Trenched crossings of "higher-risk waterways (as identified in the ELL) are, where practicable, to be carried out during the summer and autumn months (i.e. from December through to May), particularly for Kalkallo Retarding Basin and Merri Creek. Where open cut trenching is required for a watercourse, implement the following mitigation measures to minimise risks of harm to waterway heath as far as reasonably practicable and in accordance with EPA Publication 1896: Manage how you work within or adjacent to waterways: Minimum depth: 2m below bed invert level (or as otherwise agree to with MWC for designated waterways). Trench exposure: Limit the longitudinal extent of trench exposure to the extent reasonably practicable (i.e. to what could be backfilled within 24 hours) Construction duration: limit time for trench exposure and construction duration between bank to bank works to the extent reasonably practicable (e.g. pre-prepare the pipe works) Backfilling works: Backfilling in accordance with appropriate MWC standard drawings for pipe trenching, backfilling and compaction requirements	Incorporate construction timing into the construction schedule Incorporate detailed commitments into site specific management plans	At the time of the field inspection, the auditors visited Merri Creek and an unnamed tributary of Jackson's Creek, which were open-trenched during Jan/Feb 2023 (summer). The unnamed tributary was dry and Merri Creek had only a low water flow via a flume pipe. Erosion and sediment controls remained in place at these locations (e.g., coir logs, sediment fences) to minimise sedimentation of the waterways. **<u>Observation:</u>** no daily checklists for creek crossing have been sighted.		Acceptable

		Contingency works: make provisions for diverting unexpected flow. Have available backfill and stockpile of rock beaching to protect exposed trench in lieu of a late change or unexpected forecast weather event. Implement erosion and sediment controls (ESC) for the site with reference to International Erosion Control Association Best Practice Erosion and Sediment Control, Appendix P - Land Based Pipeline Construction (IECA, 2008). Construct trenched crossings of ephemeral watercourses during no or low flow conditions where reasonably practicable. Monitor weather forecasts to minimise the likelihood of having open trenches at the waterway when high rainfall events are expected. Remove all obstructions to flow after the pipe has been laid and backfilled. Reinstate the exposed trench within the watercourse and riparian zones as soon as reasonably practicable following the installation of the pipeline. Design waterway reinstatement to avoid future erosion over the pipeline alignment and to provide bank stability at the crossing location as the same or better than prior to construction. Provide temporary erosion and sediment control as needed to prevent erosion and scour until the vegetation has established throughout the post-construction period (e.g. up to 12 months depending on establishment of vegetation).				
		Undertake visual monitoring downstream of the trench during flow events if the trench has not been reinstated. Provide temporary flow diversions if there is permanent flow in the waterway. Flow diversion measures may include pumps to ensure that water can be moved from one side of trench to the other, screened inlets (or other appropriate equipment) to minimise the entrapment of aquatic fauna and outlet structures that are designed to avoid scouring of the channel. Measures must be in accordance with International Erosion Control Association Best Practice Erosion and Sediment Control, Appendix P – Land Based Pipeline Construction (IECA, 2008). Restore waterway bed and banks as soon as reasonably practicable after pipe installation and backfilling works, including revegetation using geofabric to provide temporary protection until vegetation is re-established. For steeper gullies, use rock beaching for additional stabilisation where practicable. Carry out bed and bank restoration, temporary protection and monitoring of establishment works as part of the site rehabilitation. Prepare a construction management plan for Merri Creek works including site works methodology, construction timeframes and durations, and water quality monitoring frequency and parameters for APA approval. Groundwater levels and flows will be managed in accordance with EMM GW1.				

F2.12	EMM - SW5	<u>Implement a Monitoring Program</u> Develop and implement a monitoring program for Merri Creek, if these crossings are open cut, to determine whether there are any construction related impacts. The monitoring program must adopt a control/impact approach with water quality monitored at a suitable distance of 20 - 200 metres from the Project Area both upstream and downstream of the works to establish background conditions. The monitoring program must be developed and undertaken in accordance with EPA Publication 1896: Manage how you work within or adjacent to waterways and ANZG Australia Guidelines for Water Quality Monitoring and Reporting (2018). Water quality monitoring must occur immediately prior to construction to establish background conditions upstream and downstream of the Project area. Monitoring must then occur on a continual basis during construction (e.g. at appropriate intervals) with comparisons of upstream and downstream conditions used to infer if there is a downstream impact such as increased turbidity. Monitor the benthic macroinvertebrate communities to assess pre-construction condition, detect and evaluate potential impacts from sedimentation and/or flow changes during construction and operation, implement better controls and initiate rehabilitation measures as needed.	Incorporate requirements (incl. water quality monitoring and biodiversity monitoring) of this commitment into Site Specific Management Plan for Merri Creek	Merri Creek SSEMP has been sighted, with Chapter 14 containing the monitoring provisions. The environmental aspects register has been sighted and contains water testing records at Merri Creek with location, date, pH, dissolved oxygen, salinity, total dissolved solids and temperature. This indicates that the monitoring requirements were implemented. Observation: Examples of daily inspections for Merri Creek dated 29/11/22 and 2/02/23 do not have any records of water quality testing, however, daily inspection reports dated 23/04/23 and 24/04/23 for Merri Creek do record water quality testing. Benthic Invertebrate Monitoring – Round 1 (Pre-construction condition) report conducted by Aquatica Environmental has been sighted. This report is the first of four to occur. The report sets the baseline invertebrate levels which will be used as a guide for future monitoring (which will occur bi-annually, post-construction).	Merri Creek SSEMP Daily inspections for Merri Creek dated 29/11/22, 2/02/23 23/04/23 and 24/04/23. Benthic Invertebrate Monitoring – Round 1 (Pre-construction condition) report.	Acceptable
		This biodiversity monitoring must occur at the two sites upstream and downstream of the Project Area prior to construction to establish background conditions. Biodiversity and water quality monitoring must be continued for a period of 24 months post-construction, to identify any potential effects from the construction and rehabilitation work, including secondary and lagged effects. Should the monitoring determine adverse residual impacts on surface water and biodiversity values, contingency measures must be developed and implemented. These remedial actions may include: Identifying, repairing and redesign failed management measures aimed at reducing impacts due to erosion and sedimentation. Further stabilise banks and beds at waterway crossing to reduce erosion potential and sedimentation. Inspect pumping of water from coffer dams and / or other areas if water quality exceeds background conditions and implement further management measures.				
F2.12	EMM - SW9	<u>Develop and implement a Flood Management and Response Plan (FMRP) for Kalkallo Creek and Merri Creek</u> Develop and implement a Flood Management and Response Plan during construction for Kalkallo Creek and Merri Creek. The FMRP must include but not limited to: • Measures to manage flood risk during construction including end of day requirements to limit flood risk exposure overnight • Limiting footprint of disturbance of works within waterways and floodplains to limit flood risk exposure at any point in time to the extent reasonably practicable • Placement of construction equipment and stockpile materials above threshold flood levels. • Flood warning communication protocols and emergency response procedures. As part of the detailed design, flood modelling of the existing conditions for the waterways must be undertaken and verified by MWC to inform the FMRP and to understand the flood response within the floodplain for the range of possible design events. The plan could identify restrictions on construction activities within threshold flood extents, as well as contingency planning if a flood were to occur. A specific FMRP must be prepared for Kalkallo Retarding Basin and the various waterways and drainage lines that enter the Kalkallo Retarding Basin to consider the flood response within the basin and incoming waterways during construction. FMRPs may be incorporated in to the SSEMP for a waterway crossing (see SW11).	Incorporate FMRP requirements into SSMP for Kalkallo Creek and Merri Creek	The Minor Watercourse Crossing Procedure has been sighted and contains a Flood Warning and Evacuation Management Procedure (Section 10.1) that includes the elements outlined in the condition. SSEMP – Merri Creek has been sighted and contains a Flood Warning and Evacuation Management Procedure (Section 11.1) that includes the elements outlined in column C. Observation: No inspection check lists for Kalkallo Creek have been sighted. OFI: Merri Creek checklists do not contain Flood management checks.	Minor Watercourse Crossing Procedure (18035-PR-CN-0008 Rev C) SSEMP – Merri Creek (18035-PL-HSE-0028, Rev 1)	Acceptable

F2.12	EMM - SW10	Pipeline design for waterway crossings within a Drainage Services Scheme (DSS) To minimise potential impacts to the pipeline and to account for ongoing future development within the DSS, develop the pipeline detailed design and alignment in consultation with MWC to inform the design requirements at waterway crossings that are within a DSS. This is relevant for the crossings at Kalkallo Creek and the Tributary to Merri Creek.	Incorporate consideration of crossing Design into Minor Waterway crossing procedure	Melbourne Water Creek Crossing Approval (dated 2 Dec 2021) has been sighted the approval is satisfied with the Minor Watercourse Crossing Procedure which covers the Kalkallo Creek and the Tributary to Merri Creek.	Melbourne Water Creek Crossing Approval (dated 2 Dec 2021)	Acceptable
F2.12	EMM - SW11	Develop and implement Site-Specific Environmental Management Plans for all designated waterways Prior to commencement of construction at the location, the Contractor must develop a Site-Specific Environmental Management Plan (SSEMP) for each of the watercourses: • Jacksons Creek and tributaries • Merri Creek • Deep Creek • One combined SSEMP for all other designated waterways (including Tame Street Drain, Kalkallo Creek and tributaries, and tributaries to Merri Creek, Darebin Creek and Curl Sedge Creek) The SSEMPs must be submitted to MWC for review prior to construction commencing at the location. The SSEMPs must address the following: Sediment and silt management controls Vegetation management techniques Access tracks Spoil stockpiling Machinery/Plant locations Exclusion fencing around native vegetation/habitat Flow management work method statement Sodic soil and ground movement management measures (as applicable to each watercourse) Planting / remediation management measures	Prepare and implement Site specific management plans for identified creeks as described. Note - FMRPs have been incorporated into SSEMPs for Kalkallo Creek and Merri Creek.	SSEMPs have been sighted for Jacksons Creek, Merri Creek, Deep Creek, as well as the Minor Watercourse Crossing Procedure. All plans contain MWC conditions and approval. Site-specific inspections are discussed within the relevant tab of this spreadsheet.		Acceptable
GROUNDWATER						
F2.13	EMM - GW1	Minimising dewatering rates and impact to groundwater levels and flows Design and construct the Project to minimise changes in groundwater levels, flows and quality so far as reasonably practicable, including by implementing the following measures during construction to minimise risks of harm to groundwater: • Where excavations require dewatering, adopt a construction method that minimises the dewatering period. The anticipated period is expected to be approximately four weeks at the creek crossings. • Install trench breakers adjacent to watercourses, wetlands and steep slopes as shown in the standard drawing (530-DWG-L7003) to minimise trench inflows.	Develop an agreed dewatering methodology including minimum release parameters and contingencies where minimum parameters are not met. Ensure trench breakers are designed and inserted at appropriate locations.	Enviromental aspects register (sighted on 15/02/23 and copy provided) contains dewatering records with date, location, KP, pH, Total dissolved solids, salinity and dewatering location. The following dewatering permits have been sighted: KP 50, dated 15/12/22 KP 31.2, dated 16/1/23 KP 11.46, dated 5/12/22 At the time of the field inspection, trench breakers were not sighted in the vicinity of watercourses. Trench breaker design (530-DWG-L7003) has been sighted.	Enviromental aspects register Dewatering permits dated 15/12/22, 5/12/22 and 16/1/23	Acceptable
F2.13	EMM - GW2	Minimise impact to groundwater bore users Although it is not anticipated that any neighbouring bore will be impacted by dewatering, it is possible there is unregistered bores nearby, or a slightly greater than predicted distance of drawdown influence may occur. If this is the case, and any neighbouring bores are considered likely to be impacted by the Project within 60 metres of an area of dewatering (including the registered bore at approximately KP 47.6), then the location, condition and functionality of the bore must be visually confirmed and make-good arrangements must be agreed in consultation with affected landholders, if required.	If an unregistered bore is identified, ensure that it is not impacted by construction.	APA advised quarries contain bores of concern, however, no bores will be impacted significantly by construction (due to pipe trenching not being deep enough).		Not applicable

F2.13	EMM - GW3	<u>Minimise risk of harm associated with contaminated groundwater and disposal</u> Complete additional groundwater quality analysis in the existing bore network to confirm baseline groundwater level and quality conditions prior to the construction phase to assess any existing contamination or quality issues where groundwater is likely to be intercepted during construction and dewatering is expected, and also allow suitable disposal options to be assessed and planned. Manage extracted groundwater to minimise risks of harm so far as reasonably practicable, including by implementing the following measures: Dispose groundwater in accordance with the ERS, EPA Publication 1834 Civil construction building and demolition guide and other EPA Guidelines and all relevant approvals processes with relevant authorities. Groundwater from areas that have been identified as contaminated must not be discharged to the environment (land, waterways). If required, engage with the local water authority to develop a trade waste agreement for sewer discharge. This agreement would specify the levels of contamination to allow for sewer discharge. Contaminated groundwater must either be treated onsite, depending on contaminant encountered (this may require approval from the EPA Victoria) or disposed offsite to an EPA Victoria licensed facility. Alternatively, a construction approach may be adopted where contaminated groundwater is left in-situ (i.e. not abstracted or disturbed).	Prepare a methodology to plan to undertake sufficient groundwater testing to confirm baseline. Ensure plans and monitoring/testing are in place for dewatering through areas of expected groundwater ingress.	The auditors did not witness any trench dewatering during the field inspection. Four instances of trench dewatering have been recorded in the environmental aspects register. All four instances involved release onto the RoW. APA advised there has been no interception of ground water to date (15/05/23) therefore, testing has not occured.		Acceptable
		If non-aqueous phase liquid is present in soil or groundwater within the authorised project construction footprint and exposed during construction activities, it must be, so far as reasonably practicable: (a) cleaned up; and (b) if the source of the NAPL is located on the land, the source of the NAPL must be removed or controlled (refer to EMM C1). Manage dewatering of excavated trenches/bell holes to minimise sedimentation, including the use of sediment control devices to remove suspended solids and dissipate flow. Sediment control devices must be listed in site specific environmental management plans. Minimise the duration that trench sections and bell holes are open, and divert surface water runoff away from the excavations, to reduce the potential for poor quality runoff impacting groundwater.				
F2.13	EMM - GW4	Managing unexpected groundwater encountered during construction The following actions are required before any dewatering occurs when unexpected groundwater is encountered during construction: • Review contamination risks in relation to the unexpected groundwater and undertake testing to determine appropriate management and disposal options. • Undertake assessments for the presence of actual acid sulfate soils and potential acid sulfate soils in formations where such soils could potentially occur, including the Kalkallo retarding basin and other areas with Quaternary floodplain and swamp deposits. • Identify any groundwater bores that are likely to be affected by dewatering and liaise with the affected bore owners to make appropriate arrangements as required in EMM GW2. • Assess and manage ground movement risks related to construction dewatering in accordance with EMMs GM2 and GM3. • Review the construction methodology and change if appropriate. • Undertake other measures as necessary to meet the requirements of other relevant EMMs, including the groundwater EMMs GW1 and GW3 and the contamination EMMs C2, C3 and C4.	Prepare a protocol for trench dewatering that includes encountering unexpected groundwater	The auditors did not witness any trench dewatering during the field inspection. Trench Dewatering Procedure (18035-PR-CN-0006) has been sighted. Trench dewatering have been recorded in the environmental aspects register. The register contains the date, location, KP, pH, ppm TDS and salinity and release location. APA advised there has been no interception of ground water to date (15/05/23).	Trench Dewatering Procedure (18035-PR-CN-0006) Environmental aspects register	Acceptable
F2.13	EMM - GW4	<u>Manage chemicals, fuels and hazardous materials</u> Manage chemicals, fuels and hazardous materials as detailed in EMM C6.		See EMM 6		Acceptable
F2.13	EMM - GW5	<u>Drilling Fluids Requirements</u> Manage drilling fluids in accordance with EMM C9		See EMM C9		Acceptable
F2.13	EMM - GW6	<u>Implement Spoil Management Procedures</u> Implement spoil management procedures as detailed in EMM C1.		See EMM C1		Acceptable
F2.13	EMM - GW7	<u>Design Requirements</u> The pipeline design shall consider where groundwater interaction is expected to occur and incorporate trench breakers or plugs, as well as suitable backfill compaction, to prevent preferential flow paths so far as reasonably practicable. Implement trench compaction procedures as detailed in GM4 including the design of the backfill to take into account the density and permeability of the surrounding soil.	Pipeline design to include insertion of trench breakers where appropriate and compaction that considers existing soil conditions.	APA advised at the time of the audit that this was not specified yet. Subsequent to the field audit, no documentation has been sighted for this commitment.		Observation
FUELS & CHEMICALS						

F2.14	EMM - F1	All fuels and chemicals must be stored and handled to comply with the following: • Australian Standard AS1940:2004: The storage and handling of flammable and combustible materials • EPA Publication 1698: Liquid Storage and Handling Guidelines • Victorian WorkSafe Codes of Practice • Manufacturer's instructions and • Relevant safety data sheets.	Contractor CEMP to include provision for appropriate storage and handling for fuels and chemicals on site	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains provision for appropriate storage and handling for fuels and chemicals on site. SDS register - WORM Project Chemical Register has been sighted. The auditors sighted the following during the field inspection: - chemicals and SDS stored within a self bunded storage shed at KP3.3 (HDD at Melton Hwy), along with a self-bunded diesel generator. - a self-bunded chemical storage shed and a self-bunded diesel generator on site at KP8.8 (HDD at Calder Hwy). **OFI:** A container of engine cutting oil was sighted sitting on the soil, rather than within the nearby storage shed. The auditors mentioned this to the APA Envt Advisor at the time. - self-bunded diesel storage units and a self-bunded storage shed at KP16.8 (HDD at Deep Creek).	SDS register - WORM Project Chemical Register (excel spreadsheet). The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22)	Opportunity for improvement
F2.14	EMM - F2	Safety data sheets must be available for reference for all fuels and chemicals at the storage location.	Ensure SDS are available for all fuels and chemicals	Auditors sighted an SDS folder stored within the self-bunded storage shed at KP3.3 (HDD at Melton Hwy). APA also maintains an SDS register (Excel spreadsheet) on the project SharePoint that is readily accessible.	SDS register - WORM Project Chemical Register (Excel spreadsheet).	Acceptable
F2.14	EMM - F3	The volume of liquid material (fuel, oil, lubricant) required on-site for construction activities is to be limited to only that which is required.	Ensure quantification has been calculated appropriately.	The auditors sighted fuels, lubricants and oils only at the active HDD locations, which are the locations where these liquids are required.		Acceptable
F2.14	EMM - F4	All liquid material must be stored within containment facilities (e.g. bunded areas, leak proof trays) at a designated area within the construction area.	Ensure all liquid materials are appropriately bunded	The auditors sighted the following during the field inspection: - chemicals and SDS stored within a self bunded storage shed at KP3.3 (HDD at Melton Hwy), along with a self-bunded diesel generator. - a self-bunded chemical storage shed and a self-bunded diesel generator on site at KP8.8 (HDD at Calder Hwy). **OFI:** A container of engine cutting oil was sighted sitting on the soil, rather than within the nearby storage shed. The auditors mentioned this to the APA Envt Advisor at the time. - self-bunded diesel storage units and a self-bunded storage shed at KP16.8 (HDD at Deep Creek). - washdown chemicals used at Merrie were contained within the construction RoW.		Opportunity for improvement
F2.14	EMM - F5	Where flammable or combustible chemicals are required to be stored on-site, fire-fighting equipment proportionate to the risk of the materials stored must be available for the duration of the material storage	Ensure firefighting equipment is proportionate to the volatility and risk associated with fuel/chemical storage	At each of the HDD sites visited by the auditors (at KP3.3 (Melton Hwy), KP8.8 (Calder Hwy) and K16.8 (Deep Creek)), fire extinguishers were on site. Weekly inspection reports contain a check for fire extinguishers in all mobile plant.		Acceptable
F2.14	EMM - F6	Pre-start vehicle and equipment inspections must be undertaken to check for oil, lubricant or fuel leaks and general wear and tear of hoses. Vehicles and equipment will be maintained and serviced in accordance with the service schedule.	Ensure pre-start inspections are undertaken and vehicles serviced.	Example pre-start form dated 11/05/23 for a light vehicle (HDD) has been sighted. The form contains checks for engine oil and coolant levels and leaks. **Observation**: Form does not include a check for general wear and tear of hoses (noting that this would be next to impossible for the average driver to check). Example pre-start overview has also been sighted, the overview shows six pre-start forms being approved.	Example pre-start form dated 11/05/23 Example pre-start overview	Acceptable
F2.14	EMM - F7	Spill kits must be available at all work sites, refuelling points and fuel and chemicals storage locations.	Ensure spill kits are kept fully stocked and are close to active work site locations.	Auditors sighted stocked spill kits at KP3.3 (HDD at Melton Hwy), KP 5.0 – (pipe coating), KP8.8 (HDD at Calder Hwy) and KP16.8 (HDD at Deep Creek). Weekly inspection reports contain a check for spill kits.		Acceptable

F2.14	EMM - F8	Should a spill/release occur the Contingency Plan for Chemical/Fuel Spill Response must be followed (refer to Section 9).	Include Chemical/Fuel Spill response in Contractor CEMP	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) contains a Spill Response Plan. Spiecapag ENVIRONMENTAL INCIDENT REPORT FORM dated 24/10/2022 for an hydraulic oil spill of approximately 11.6 L at KP 46 within the RoW (non-reportable) details the actions implemented: 1. Excavator was shut down and isolated by operator preventing excess hydraulic oil being pumped from the hydraulic hoses towards the failure / leaking point of the hydraulic bucket cylinder. 2. The SCA acting supervisor informed SCA Superintendent. 3. Spill response initiated and spill kit was deployed at the scene within 5 min of the incident. 4. SCA Environmental Manager was informed by SCA Superintendent 5. APA notified verbally via phone call from SCA (Note: APA supervisor was also at the scene and informed APA management team separately as well). 6. Repair works commenced on hydraulic cylinder after additional absorbent material was deployed 7. Spill was collected to the full extent of contamination and contained within spill kit. 8. Spill kit stored at Essendon yard for later safe disposal The actions implemented reflect those outlined within the Spiecapag CEMP.	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) Incident report from APA (incident no. 514334) Spiecapag (report No.014)	Acceptable
WASTE						
F2.15	EMM - W1	Waste management must comply with the EPA waste hierarchy - waste avoidance, waste re-use, waste recycling, and waste disposal.	Incorporate waste hierarchy into Contractors CEMP and waste management plan	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and includes the EPA waste hierarchy within the waste management section. The Wasco CEMP (18035-PL-HSE-0023, Rev D, dated 14/02/23) has been sighted and lists the EPA waste hierarchy as an environmental management measure.	Wasco CEMP The Spiecapag CEMP	Acceptable
F2.15	EMM - W2	The construction area must be kept free of litter and waste and refuse containers or skip bins must be located at designated storage areas. Skip bins are to be covered to prevent access by fauna and pest species.	Incorporate waste management into Contractors CEMP	The Wasco CEMP (18035-PL-HSE-0023, Rev D, dated 14/02/23) has been sighted and contains environmental management measures for waste (including what is identified in row C). The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains waste management environmental management measures (including what is identified in row C). The auditors observed that the RoW was free of litter and that waste facilities were provided at the HDD sites and other active work fronts. Weekly and daily inspection reports contain waste management checks.		Acceptable
F2.15	EMM - W3	General waste to be removed from the construction area by crews. Surplus or waste materials to be stockpiled at laydown areas for regular collection.	Incorporate waste management into Contractors CEMP	The auditors observed that waste facilities were provided at the HDD sites and other active work fronts. Waste Services Report from JJ's waste and recycling dated 6/2/23 verifies waste materials are regularly collected. The Wasco CEMP (18035-PL-HSE-0023, Rev D, dated 14/02/23) has been sighted and contains environmental management measures for waste (including what is identified in row C). The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains waste management environmental management measures (including what is identified in row C).	Waste Services Report from JJ's waste and recycling dated 6/2/23	Acceptable
F2.15	EMM - W4	Separate, labelled general and regulated waste bins must be available. An EPA licensed contractor must collect regulated waste for recycling or licensed disposal.	Incorporate waste management into Contractors CEMP	Bins were in place at the following locations: - KP3.3 (HDD at Melton Hwy) - large yellow skip bins were on site, but not labelled. These were general waste bins. **OFI:** A 20 L container of diesel engine oil was incorrectly put into a general waste bin. - KP8.8 (HDD at Calder Hwy)- general waste skip bin. - KP16.8 (HDD at Deep Creek) - general waste skip.		Opportunity for improvement
F2.15	EMM - W5	Spill kits are to be available at regulated waste storage areas	Ensure spill kits are kept fully stocked and are close to active waste storage locations.	Auditors sighted stocked spill kits at KP3.3 (HDD at Melton Hwy), KP 5.0 – (pipe coating), KP8.8 (HDD at Calder Hwy) and KP16.8 (HDD at Deep Creek). Weekly inspection reports contain a check for spill kits.	Visual inspection Weekly inspection reports	Acceptable

F2.15	EMM - W6	Disposal of any waste contaminated soil must be undertaken in accordance with EPA Publications IWRG 821: Waste Transport Certificates and IWRG 822: Waste Codes and must require the use of EPA-registered trucks for transport of the soil to appropriately licensed landfills. Contaminated soil must be remediated or disposed of at an EPA approved facility in accordance with EPA waste disposal guidelines.		Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23 provides details of contaminated soil disposal that has occurred including date, job number, staff, time, hrs/qty, rates, item and description. Observation: auditors did not sight documentation that verifies EPA-registered trucks and an EPA approved facility was used.		Observation
F2.15	EMM - W7	Toilets at the construction depot must be a self-bunded portable blocks. Clearing of portable toilet facilities, including waste collection and disposal, must be undertaken by a licensed waste contractor.	Include provision in the Contractor's CEMP	The Wasco CEMP (18035-PL-HSE-0023, Rev D, dated 14/02/23) has been sighted and contains environmental management measures for waste (including what is identified in column C). The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains waste management environmental management measures (including what is identified in column C). Observation: no records of waste collection from toilet facilities have been sighted.		Observation
F2.15	EMM - W8	Appropriate receptacles must be provided and used for cigarette butt disposal.	Include provision in the Contractor's CEMP	The Wasco CEMP (18035-PL-HSE-0023, Rev D, dated 14/02/23) has been sighted and contains environmental management measures for waste (including what is identified in column C). The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains waste management environmental management measures (including what is identified in column C). Auditors sighted cigarette butt receptacles during the audit at KP8.8 (HDD at Calder Hwy).	Spiecapag CEMP Wasco CEMP	Acceptable
F2.15	EMM - W9	Mats/plastic ground covers will be used to capture coating overspray.	Include provision in the Contractor's CEMP	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains waste management environmental management measures per this requirement. Auditors witnessed pipe coating at KP 5. No mats/plastic ground covers were in place.	Spiecapag CEMP	Minor non-conformance
HDD						
F2.16	EMM - HDD D1	For major HDDs, the drill profile design, the work method statement and the proposed volumetric drilling fluid tracking program is to be approved by APA prior to the commencement of HDD activities. The work method statement is to be prepared to the satisfaction of the Regulator.	Include provision in the Contractor's CEMP Include provision in the Horizontal Directional Drill Management Plan and/or Site Specific Management Plans	Auditors inspected HDD at Melton Hwy (KP 3.3), Calder Hwy (KP 8.8) & Deep Creek (KP 16.8) during the audit. Email correspondence between the APA Acting Access and Approvals Manager SE Australia and the DELWP dated 17 November 2022 has been sighted. The email verifies that DELWP is satisfied with the work method statement for HDD.	Email correspondence between the APA Acting Access and Approvals Manager SE Australia and the DELWP dated 17 November 2022	Acceptable
F2.16	EMM - HDD D2	An Inspection and Test Plan must be developed to ensure quality control during the HDD activities.	Include provision in the Horizontal Directional Drill Management Plan and Drilling Fluid management plan	**Observation:** Auditors have not reviewed the Inspection and test plan.		Observation
F2.16	EMM - HDD D3	Earth bunds and drainage channels must be placed around the upper edges of drill sites and work areas, to divert natural run-off around and away from the site.	Include provision in the Contractor's CEMP Include provision in the Site Specific Management Plans	The following HDD sites were visited by the auditors: - KP3.3 (Melton Hwy) - site is flat and did not require earthern bunding. - KP8.8 (Calder Hwy) - as above. - K16.8 (Deep Creek) - this site was surrounded by hills upslope of the HDD area, but did not have earth bunds on the upslope side. It did have sediment fences and earthern bunds on the downslope areas.		Acceptable
F2.16	EMM - HDD D4	Appropriate measures must be installed for HDD works to manage drilling fluid and bunding requirements.	Include provision in the Horizontal Directional Drill Management Plan Include provision in the Drilling Fluid Management Plan Include provision in the Site Specific Management Plans	The following HDD sites were visited by the auditors: - KP3.3 (Melton Hwy) - site is flat and did not require earthern bunding. - KP8.8 (Calder Hwy) - as above. - K16.8 (Deep Creek) - this site was surrounded by hills upslope of the HDD area, but did not have earth bunds on the upslope side. It did have sediment fences and earthern bunds on the downslope areas.		Acceptable
F2.16	EMM - HDD D5	Any runoff in sump pits used during drilling activities must be managed daily.	Include provision in the Horizontal Directional Drill Management Plan Include provision in the Drilling Fluid Management Plan Include provision in the Site Specific Management Plans	**Observation:** Daily inspection provided for HDD Deep Creek dated 20th of December 2022 contains a check for whether runoff sump pits are used, however, no other specific checks have been sighted for the management of the runoff sump pits.		Observation

F2.16	EMM - HDD D6	Appropriate spill response and clean up equipment will be onsite during HDD activities. If a spill/release occurs, the Contingency Plan for HDD mud release or fuel and or chemical release will be implemented.	Include provision in the Horizontal Directional Drill Management Plan Include provision in the Site Specific Management Plans	HDD sites at Melton Hwy (KP 3.3), Calder Hwy (KP 8.8) & Deep Creek (KP 16.8) were visited by the auditors. All sites had stocked spill kits. A mud release occurred at Calder Hwy during the audit (15/02/23). Auditors did not witness the implementation of the contingency plan (site was visited after the spill occurred). Incident reports from APA (incident no. 514334) and Spiecapag (report No.014) verify the proecdure outlined in the DRILLING FLUIDS MANAGEMENT PLAN (18035-PL-CN-0009) was followed: - Drilling stopped immediately - frac was cleaned up immediately via vac truck - The incident was reported to Spiecapag Senior Engineer and Environmental Manager Because the mud release happened outside the RoW, the incident needed to be reported externally (to DEECA). Email dated 15/02/23 shows the APA Acting Access and Approvals Manager SE Australia notifying the DEECA of the reportable incdient.	APA (incident no. 514334) Spiecapag (report No.014) Email dated 15/02/23 between the APA Acting Access and Approvals Manager SE Australia and DEECA.	Acceptable
F2.16	EMM - HDD D7	Drilling fluids are to comprise only benign materials without the potential to cause contamination to land and water.	Incorporate provision into the Drilling Fluid Management Plan	The HDD sites visited during the audit were using water based muds.	Visual inspection	Acceptable
F2.16	EMM - HDD D8	All facilities utilised in the surface mud handling (mixing, cleaning and pumping) during the HDD activities must be bunded.	Include provision in the Contractor's CEMP Include provision in the Horizontal Directional Drill Management Plan	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and contains what is outlined in column C as an environmental control. Auditors sighted earthern bunding around the down slope at the Deep Creek HDD site (KP 16.8). Auditors sighted bunding and sediment fencing at KP 3.3 – HDD (Melton Hwy) and at KP 8.8 – HDD (Calder Hwy).	Visual inspection	Acceptable
HOT WORKS						
F2.17	Environment Management Measures - Hot Works HW1	Undertake hot works in areas cleared of combustible materials (e.g. fuel, chemicals, wood, paper, plastic or rubbish). Combustible materials that cannot be cleared from the area shall be covered, screened or otherwise made safe	Include provision in the Contractor's CEMP	The auditors observed pipe welding taking place at Donovans Lane (KP 39), but access was restricted for safety reasons. The construction RoW was clear of combustible materials.	Visual observation	Acceptable
F2.17	Environment Management Measures - Hot Works HW2	Comply with Fire Rescue Victoria (FRV)/Country Fire Authority (CFA) restrictions during the CFA declared Fire Danger Period when carrying out hot works: • a fire-resistant shield or guard is in place to stop sparks, hot metal or slag • an area at least 1.5 metres from the operation is clear of flammable material or wetted down sufficiently to prevent the spread of fire • a hose connected to a reticulated water supply or water spray knapsack containing at least 9 litres of water • all cut-offs and hot materials from the operation are placed in fire-proof containers • a person is in attendance at all times while the fire is a light (hot work in progress) and has the capacity and means to extinguish the fire • the fire is completely extinguished before the person leaves	Include provision in the Contractor's CEMP Include provision in the Bushfire Management Plan	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and includes the provision outlined in column C. Observation: The APA Bushfire Management Plan (320-PL-ER-0016) Rev 1 dated 04/09/20 does not contain all the provisions of this condition. Auditors witnessed hotworks at KP 39 (Donovans lane). Auditors sighted: - a fire resistant shield/guard - a person is in attendance at all times while the fire is a light the area was free from flammable material Auditors were unable to verify if the below occurred: - a hose connected to a reticulated water supply or water spray knapsack containing at least 9 litres of water. - all cut-offs and hot materials from the operation are placed in fire-proof containers. - the fire is completely extinguished before the person leaves.		Observation
F2.17	Environment Management Measures - Hot Works HW3	Obtain and comply with FRV/CFA Section 40 permit on Total Fire Ban Days if carrying out hot works	Include provision in the Contractor's CEMP Include provision in the Bushfire Management Plan	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and includes the provision outlined in column C. Observation: Auditors have not sighted the FRV/CFA Section 40 permit		Observation
F2.17	Environment Management Measures - Hot Works HW4	Fire extinguishers are to be carried by all mobile plant.	Include provision in the Contractor's CEMP	The Spiecapag CEMP (18035-PL-HSE-0014, Rev C, dated 27/09/22) has been sighted and includes the provision outlined in column C. Fire extinguishers were sighted on mobile plant during the audit at KP 39 (Donovans lane - pipe bending machinery) & KP 42 (Meeri Creek - Biosecurity washdown trailer). The auditors did not get a chance to inspect the transport vehicles for a fire extinguishers during the audit. Weekly inspection reports contain a check for fire extinguishers in all mobile plant.		Acceptable
HYDROTESTING						

F2.18	Environment Management Measures - Hydrostatic Testing H1	Prior to hydrostatic testing, the pipeline must be pre-cleaned to remove weld debris, dust and surface scale. Produced waste water must be captured in a temporary pit or bunded area and removed by an EPA licenced waste contractor.	Sight Spiecapag CEMP Sight hydrotest release methodology Sight record of inspections assessing effectiveness of hydrotest release methodology.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H2	All hydrotesting operations must conform to *AS2885.5: Gas and liquid petroleum - Field pressure testing*	Include provision in the Contractor's CEMP Prepare a hydrotest release methodology that is consistent with all standards and release parameters.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H3	Hydrostatic test water discharge must only be undertaken where water designated for release into the environment is of a quality that is within relevant statutory water quality guidelines.	Include provision in the Contractor's CEMP Prepare a hydrotest release methodology that is consistent with all standards and release parameters.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H4	Where hydrostatic testing is not consistent with any of Environmental Controls H3 to H5, hydrostatic test water must be removed by an EPA licenced waste contractor.	Include provision in the Contractor's CEMP Prepare a hydrotest release methodology that is consistent with all standards and release parameters.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H5	Any discharge of hydrotest water must not result in soil erosion or sedimentation of land or water. Sediment control devices to remove suspended solids such as geotextile fabric filters must be used. No direct discharge must occur to watercourses or drains.	Include provision in the Contractor's CEMP Prepare a hydrotest release methodology that is consistent with all standards and release parameters.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H6	Pumps and compressors used for hydrotesting and pigging activities must be muffled to reduce noise.	Include provision in the Contractor's CEMP Prepare a hydrotest release methodology that is consistent with all standards and release parameters.	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
F2.18	Environment Management Measures - Hydrostatic Testing H7	All venting and flaring activities must be supervised by APA	Include provision in the Contractor's CEMP	**OFI:** APA advised no hydrotesting has taken place to date (15/05/23), however, the environmental aspects register contains a hydrotest record for Tame St Drain (KP 8.6) dated 21/02/23 dewatered from pipe to land.		Opportunity for improvement
REINSTATEMENT						
F2.19	Environment Management Measures - Reinstatement R1	Project activities must be progressed sequentially, with clean-up, restoration and rehabilitation as soon as practical after installation activities are complete unless weather conditions prevent this	Include provision in the Contractor's CEMP	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R2	If weather conditions prevent the prompt reseeding of the disturbed areas within the construction area, controls must be put in place, monitored and maintained to manage erosion and sedimentation until such time reseeding can occur	Include provision in the Contractor's CEMP	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R3	The construction area must be rehabilitated to pre-existing contours with natural drainage lines restored and protected if required. Where required, seeding, soil conditioning of disturbed areas must be undertaken as part of the reinstatement activities.	Include commitment in Contractor CEMP Include requirement for inspection for reinstated contouring in property sign off process.	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R4	Soil inversion must be avoided during respreading of topsoil	Include commitment in Contractor CEMP Include requirement for inspection for inversion in property sign off process.	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R5	Soil surfaces that have been compacted due to construction activities, such as those subject to traffic or storage areas within the construction area, must be ripped to allow the topsoil to bind with the subsoil and increase water filtration	Ensure that construction contractor reinstatement methodology includes ripping of compacted sections of the ROW.	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R6	Targeted control of weeds must be undertaken by a qualified pest plant control contractor to ensure that the construction area does not have an increased density and distribution of noxious and agricultural weeds relative to adjacent areas	Undertake active monitoring of the alignment during the defect liability period	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R7	Following completion of reinstatement, agreement must be sought from landowners (and occupiers, managers or government agencies as applicable) of the satisfaction of the reinstatement work as required by conditions of the Pipelines Licence	Develop a methodology for reinstatement /restoration close out including provision for landholder acceptance.	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R8	Following the completion of reinstatement activities, the construction area must be monitored for a period of 12-24 months to ensure the land is stable and consistent with adjacent areas. Any defects from construction must be rectified during this time and following this period any residual environmental issues must be addressed through the APA's Operating Environmental Management Plan	Undertake active monitoring of the alignment during the defect liability period	N/A - post-construction audit		Not applicable
F2.19	Environment Management Measures - Reinstatement R9	Reinstatement will be undertaken in accordance with land owner agreements required under the Pipeline Licence	Incorporate landowner reinstatement input into property management plans	N/A - post-construction audit		Not applicable

		Percentage of findings
118	Acceptable	59
0	Major non-conformance	0
3	Minor non-conformance	1.5
18	Observation	9
24	Opportunity for improvement	12
37	Not applicable	18.5
200	**TOTAL**	

WORM Commitments Register (WASCO CEMP Rev D)

Section	Title	Text extract from CEMP	Commitment	Evidence of Compliance	Audit finding	Document reference	Compliant?
19.1.1	General	To plan for, manage and minimise risks of environmental harm associated with the proposed construction activities. Conformance with the relevant limits and controls specified in this performance standard. The duration of the proposed works across all areas, unless otherwise stated	Construction drawings must clearly delineate the site, access points and sensitive areas (e.g. Native vegetation) in or adjacent to the site. A Site plan must form part of the site induction and be available to site supervisors at all times during construction.	Project Induction Site Plan available in site office and crib hut during construction.	Site plan(s) are not within the project induction or within the CEMP. However a Site Amenities & Emergency Assembly Area map is within the induction and was hung in the crib, the map does not show any sensitive areas. Facility design has been sighted, which clearly delineates the site and access points. The design does not show any sensitive areas.	Main induction	Acceptable
Noise and vibration							
19.2	NV1	WAPL are responsible for managing the noise and vibration emissions from the Project construction activities. Due to WAPL construction activities being conducted on an isolated, stationary site, a Construction Noise and Vibration Management Plan(CNVMP) is not required for the works. WAPL will conduct all works in accordance with the noise standards within the EPA Publication 1834 Civil Construction, building and demolition. To prevent construction noise causing a harm to human health and the environment, WAPL will (see the commitments in column D). *Note: The auditors agree that the WASCO site is isolated and far from any sensitive receptors, therefore, majority of the commitments within column D are considered N/A.*	Conduct works within the standard working hours (Monday to Sunday 7am – 6pm) 21/7 roster	Environment Inspection	HSE advisor confirmed during the audit that work is being conducted within standard working hours (7am-5pm) and hours did not need to be adjusted due to noise & vibration not being applicable.		Acceptable
			Face all construction noise generating sources away from sensitive receptors as far as reasonably practicable	Environment Inspection	Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to the position of noise generating sources. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.	Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23.	Not applicable
			Plan traffic movements in a way which reducing impacts to surrounding sensitive receptors and the travelling public	Environment Inspection	Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to traffic management and noise. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.	Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23.	Not applicable
			Assist in undertaking community consultation and notification for Project works with APA	Environment Inspection	Auditors have not sighted evidence for this condition.		Observation
			Undertake Noise and Vibration awareness training via induction or toolbox talks. Ensure that all WAPL personnel understand responsibility to limit construction noise and vibration.	Environment Inspection	Hazardous noise TBT presented by HSE advisor dated 22/01/23 and attendance record has been sighted.	N&V TBT minutes and attendance sheet	Acceptable
			Turn off equipment and vehicles when not in use and no excess use of radios/stereo.	Environment Inspection	Auditors did not witness any equipment or vehicles turned on when not in use during the audit. Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to turning off equipment and vehicles. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Not applicable
			Plan lifts to limit noise and do not drop material when unloading	Environment Inspection	Auditors did not sight any lifts or dropped material during the audit. Enviroment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to lifts. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Not applicable
			Use grid electricity to power construction activities over generators where possible	Environment Inspection	The auditors did not note whether this commitment was met, but sighted several diesel generators on site.		Not applicable

			Provide site parking away from sensitive receptors where practicable to reduce the noise impact from reversing beepers	Environment Inspection	Auditors sighted the site carpark within the RoW away from sensitive receptors.		Acceptable
			Maintain plant, equipment and vehicles in good working order	Environment Inspection	Plant pre-acceptance checklist dated 19/10/22 verifies the plant in in good working order. Generator pre-start daily checklist dated 10th-13th of October 2022, verifies the generator is in good working order. Environment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 contain a check for plant and equipment maintenance.	Environment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 Generator pre-start daily checklist dated 10th-13th of October 2022 Plant pre-acceptance check list dated 19/10/22	Acceptable
			Use the lowest noise emitting equipment for works where practicable.	Environment Inspection	Environment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to selection of noise emitting equipment. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Not applicable
			Plan the use of jackhammers and rock breakers between 10am-3pm where possible to reduce the noise impact to sensitive receptors	Environment Inspection	Auditors did not witness any jackhammering during the audit. Environment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to jackhammering. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Not applicable
			Maximising shielding of noisy activities by using the topography, surrounding buildings and vegetation to shield construction noise from sensitive receptors	Environment Inspection	Environment inspection checks dated 16/9/22, 19/11/22, 14/12/22 & 15/1/23 do not contain checks specifically relating to shielding of noisy activities. This commitment is N/A due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Not applicable
			Consult APA and the surrounding community if any construction activities (must be justified unavoidable works) are required outside of standard construction hours and implement additional mitigation measures as required.	Environment Inspection	At the time of the Audit (16/02/23) the HSE Advisor advised that no work has been conducted outside of working hours.		Not applicable
	NV4	As far as reasonably practicable WAPL will increase the distance between a sensitive receptor and the noise/vibration source to reduce impacts. This can be achieved through strategic placement of stationary equipment (e.g. generators used for specific works) within the construction corridor to maximise the distance between source and receptor		Site Plan	All stationary equipment was sighted within the construction corridor during the audit.		Acceptable
	NV5	As far as reasonably practicable limit works to the 'standard working hours'. Identify activities required to be undertaken outside of the standard working hours.		CEMP Environment Inspection	At the time of the audit (16/02/23), the HSE Advisor advised that no work has been conducted outside of working hours.		Acceptable

	NV6	During construction WAPL will maintain a Complaints Register that records: -Name of persons receiving complaint - Name of person making the complaint -Date and time of complaint - Nature of the complaint - Actions taken to rectify the issue - Actions to minimise risk of repeated occurrence - Name of person responsible for undertaking the required actions - Communication of response to the complaint Following complaints WAPL will implement the following measures: - Establish a community liaison phone number and permanent site contact number so that noise related complaints can be received and addressed in a timely manner - Determine whether any unusual activities were taking place at the time of the complaint that may have generated higher noise levels than usual and whether they may be attributed to the construction site activities - Implement additional mitigation measures where required and reasonably practicable.	During construction WAPL will maintain a Complaints Register	Complaints Register	HSE Advisor advised no complaints had been made to date at the time of the audit (16/02/23). APA reiterated that no complaints had arisen as at 24/05/23. **OFI:** APA advised that WASCO do not have a separate complaints system and that all complaints lodged and logged via the public access APA contact number.		Opportunity for improvement
	NV7	If any reasonable noise and vibration complaints are received due to construction, WAPL will communicate with the affected receiver and implement reasonable noise or vibration management measures.		Complaints Register	HSE advisor advised no complaints had been made to date at the time of the audit (16/02/23). APA reiterated that no complaints had arose as at 24/05/23 due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Acceptable
	NV10	WAPL will ensure the following noise levels are not exceeded as far as reasonably practicable. See NV10 in CEMP.			Noise is not officially monitored due to Noise & Vibration not being an issue for this site, the HSE advisor showed a noise monitoring app that they use infrequently to observe noise.		Not applicable
Air emissions							
19.2.1	AQ1	Construction Dust Management - Periodically review sensitive receptor locations to identify any new receptors, having particular regard to new residential development Controls must be implemented if dust is observed to be causing a hazard (such as a wind barrier where directly impacted residences are located immediately adjacent to the construction corridor). If dust levels cannot be contained works must be modified or stopped until dust hazard is reduced to a manageable level, such that it can be controlled using the standard measures.		Environment Inspection Form Complaints Register	At the time of the audit (16/02/23), no noise receptors were identified within proximity of the site and no new residential development was present in the vicinity of the site. APA advised no complaints have been made to date (24/05/23).		Acceptable
19.2.1	Dust Monitoring	WAPL are not required to conduct real time dust monitoring under the Project EES as dust sensitive receptors are outside the impact footprint as identified by Table 23 in the ESS Technical Report G – Air Quality.		N/A	N/A		Not applicable
19.2.1	AQ3	In the event that odorous soils (as a result of contamination or acid sulfate soils) are uncovered during construction, standard soil management measures must be undertaken, as outlined in EMM C1 (Implement spoil management measures).	In the event that odorous soils are uncovered during construction, standard soil management measures must be undertaken.	As required	HSE advisor advised odorous soils have not been uncovered to date at the time of the audit (16/02/23). Mixing of soil occurs in order to dissipate any odours. Smell has only occurred in pot holes that fill with water. Corrective actions register does not contain any incidents relating to odorous soils.		Not applicable
Biodiversity							
19.2.2	B1	Vegetation Management Confine all vegetation clearing works to the defined construction area.		Environment Inspection Forms	Auditors did not sight any evidence of vegetation clearing outside of the defined construction area. **OFI**: Environmental inspection forms do not contain vegetation clearing checks.		Acceptable
		Clearly demarcate all buffer zones, no-go zones, tree protection zones, and the boundary of the construction area prior to relevant works commencing.		Environment Inspection Forms	Auditors witnessed temporary construction fencing in place to delineate the construction sites. The site did not contain any buffer zones, no-go zones, or tree protection zones.		Acceptable

		Install and maintain temporary fencing along the construction footprint boundary in areas adjacent to sensitive environmental values. The Matted Flax Lily and Tough Scurf-Pea would be protected by temporary fencing (e.g. star pickets and wire fencing or galvanized temporary construction fencing).		Environment Inspection Forms	Auditors witnessed temporary construction fencing in place to delineate the construction sites. Auditors did not sight any fenced areas specifically for the Matted Flax Lily or Tough Scurf-Pea.		Acceptable
		Clearly demarcate and identify on site all environmental features to be retained within or directly adjacent to the construction corridor, prior to relevant works commencing.		Environment Inspection Forms	Auditors sighted a tree marked clearly with an 'X' adjacent of the construction corridor that APA advised was intended for removal but will be retained.		Acceptable
		Any necessary trimming of tree branches located on the edge of the construction corridor and, overhanging into construction/activity areas must be carried out by a qualified arborist		Environment Inspection Forms	The arborist qualification (advanced certificate in arboriculture 3300FFB) has been sighted. However, it is unclear if trimming has taken place as no records were provided.		Observation
19.2.2	B2	Pest Plant/Animal/Pathogen Controls Implement the following measures during construction to manage biosecurity risks and address Catchment and Land Protection Act 1994 (CaLP Act) obligations: - Locate CaLP Act listed weeds in the construction corridor and assess the risk of additional spread prior to relocating topsoil, implement measures to manage this risk during clear and grade, and reinstatement.		Weed and Seed Register Environment Inspection Form	During the audit, the HSE advisor mentioned an initial walk around was done on the construction corridor. Auditors have not received evidence of the initial walk around or any records of CaLP Act-listed weeds being present. **Observation:** Environmental inspection forms do not have vegetation specific checks.		Observation
		All vehicles and construction equipment, including third parties, must be free of weeds, seeds and soil material prior to arrival to the site, consistent with A Guide for Machinery Hygiene for Civil Construction (Civil Contractor's Federation, 2011).		Weed and Seed Register Environment Inspection Form	Several copies of weed hygiene declarations have been sighted, dated 31/8/22, 12/9/22, 11/10/22, 30/11/22 & 6/12/22. **OFI:** Environmental inspection forms do not have weed & seed specific checks.	Weed hygiene declarations	Acceptable
		Weed and seed inspections must be completed for all vehicles and plant on arrival, with a record of the inspection to remain with the vehicle		Weed and Seed Register Environment Inspection Form	Several copies of weed hygiene declarations have been sighted, dated 31/8/22, 12/9/22, 11/10/22, 30/11/22 & 6/12/22. **OFI:** Environmental inspection forms do not have weed & seed specific checks.	Weed hygiene declarations	Acceptable
		To a reasonable extent practicable during the clear and grade phase, ensure that vehicles and plant traversing between land parcels are managed to avoid the risk of additional spread of weeds between land parcels, and are free of soil clumps and sods prior to entry and exit from the construction corridor.		Weed and Seed Register Environment Inspection Form	Auditors did not witness the clear and grade phase.		Not applicable
		Evaluate disturbed areas post-construction and implement remedial measures as required within a reasonable timeframe.		Weed and Seed Register Environment Inspection Form	N/A - scope of future audit.		Not applicable
		Manage waste in accordance with EMM C7 (see below).		Weed and Seed Register Environment Inspection Form	See C7 below.		Acceptable
		Vehicle Washdown Bay – Phytophthora Pathogen Control If working in any area where dieback is identified, the following measures will be implemented on exit from the area: see B2		Weed and Seed Register Environment Inspection Form	Auditors did not sight an evidence of dieback (dead or yellowing vegetation) during the audit within or adjacent to the site.		Not applicable
	B3	Contractor Awareness Before commencing site work, all Project personnel must attend an induction that outlines environmental management requirements. This must include: - No-go zones - Biodiversity values of the construction corridor, specifically areas of native vegetation and threatened species habitat - Habitat and fauna awareness - Location of other environmentally sensitive areas - Native vegetation removal regulations and penalties for non-compliance - EPBC Act and FFG Act regulations and penalties for non-compliance.		Project Induction Project Induction Register	Induction presentation (2166 WORM Site Orientation (Induction)) lists what the CEMP addresses and notes that a hard copy is in the office/crib. The induction register verifies all personnel are inducted. However, the presentation does not does not go into detail with the requirements of this condition. APA provided additional induction extracts on 23/5/23 that contained environmental elements, however, none that relate to the requirements outlined in this condition.	Induction PowerPoint (2166 WORM Site Orientation (Induction)) and induction register	Major non-conformance

	B5	Lighting Impacts to Fauna Design and manage lighting in accordance with best practice lighting design as outlined within the National Pollution Guidelines for Wildlife (DAWE 2020) where these do not conflict with construction safety. Where lighting is required, avoid unnecessary light spill into surrounding areas that provide habitat for threatened fauna as far as reasonably practicable.		Environment Inspection Form	HSE advisor advised no night time work has occurred to date (16/02/23) and that risk assessment will be conducted if night works are required.		Not applicable
	B6	Noise Impacts to Fauna Construction noise and vibration must be managed in accordance with the requirements identified in EMM NV1 and NV2.		Environment Inspection Form	See NV1 above. NV2 was not presented in the latest revision of the CEMP (Rev D) due to noise and vibration not being an issue (as described in NV1). Due to noise & vibration not being an issue because of its isolation from sensitive receptors.		Acceptable
	B8	Topsoil Management -Topsoil imported to site from external locations must be free of weeds and pathogens. - Stockpiled topsoil removed from weed-infested sites for the Project must only be re-used, as far as reasonably practicable, in the location that it was originally sourced from.		Environment Inspection Form	HSE advisor advised that no topsoil had been imported, however, sand has been imported. Auditors have sighted the written confirmation from the technical supervisor at Boral (dated 31/3/23) that all Boral materials specified as crushed rock products aggregates and dust, are produced from virgin materials and sourced from the naturally occurring pit deposits and all care is taken to ensure stockpiles are well maintained and separated from potential foreign materials, weeds and contaminants.	Letter from the technical supervisor at Boral (dated 31/3/23)	Acceptable
	B10	Surface Water Sedimentation and Runoff Manage surface water sedimentation and risks of harm in accordance with EMM SW4 and EMM SW5.		Environment Inspection Form	See below EMM SW4 & SW5.		Acceptable
	B11	Surface Water Contamination Manage chemicals fuels and hazardous materials in accordance with EMM C6 to minimise risks of harm on ecological values as far as reasonably practicable.		Environment Inspection Form	See below EMM C6.		Acceptable
	B16	Additional Site Assessment and Management - Any vegetation clearing or damage to plants outside the construction corridor that occurs accidently or without prior approval must be reported as an incident and works must cease immediately. See B16 for what accidental clearing is subject to.		Environment Inspection Form Incident Report and Investigation	The HSE advisor advised no incidents had occurred outside RoW at the time of the audit (16/02/23). The corrective actions register confirms no accidental or unplanned vegetation clearing has occurred outside the RoW (most recent observation/hazard is dated 12/1/23).	Corrective Action Register	Acceptable
	B18	Value-specific Mitigation Develop and implement specific measures to protect EPBC Act and/or FFG Act communities that are impacted, including: - Measures required by EMM B1 - Establishing no-go areas around plant populations - Marking any significant values such as large old trees on site plans - An arborist's assessment to establish no-go areas around retained large old trees close to the construction corridor - Retention of stockpiled vegetation to be used for site rehabilitation - Rehabilitating disturbed areas as soon as reasonably practicable - A Tree Management Plan must be prepared based on detailed construction drawings and surveyed tree locations (EMM B23).		Environment Inspection Form Arborist Report (if construction occurs within TPZ)	The auditors did not sight any no-go areas around plant populations during the audit, due to no plant populations being present within the construction. Site plans provided do not contain any markings for significant values, due to no significant values being present. Arborist report/Tree protection management plan has been sighted. Auditors did not sight any stockpiled vegetation to be used for site rehabilitation during the audit. The auditors did not witness any rehabilitation during the audit (this is the scope of a future audit)	APA WORM Rev10 Tree Impact Assessment Report & Tree Protection Management Plan	Acceptable
	B23	WAPL have one tree to be trimmed on the Project to facilitate construction. WAPL will have a Level 5 Arborist undertake the tree trimming and provide WAPL with an Arborist Report at the completion of the tree trimming.		Arborist Report	Arborist qualification (advanced certificate in arboriculture 3300FFB) has been sighted, however, the Arborist Report at the completion of the tree trimming has not been provided.		Observation
Cultural and historic heritage							
19.2.3	CH1	Cultural Heritage Management Plans - WAPL will comply with the CHMP 18496 during construction works, specifically the notification requirements for unexpected cultural heritage finds.		Environment Inspection Form CHMPs 18496	HSE Advisor advised that nothing unexpected has been found to date at the time of the audit (16/02/23). The corrective actions register		Not applicable

	CH4	Unlisted Historic Heritage Sites - Should an unknown historic heritage site, value or object be discovered during construction, follow the unexpected finds procedure, outlined in Appendix G of APA's CEMP.		Appendix G of APA's CEMP	confirms no unexpected finds has occurred (most recent observation/hazard is dated 12/1/23).		Not applicable
Contamination							
19.2.4	C1	Spoil Management Plan During the management of contaminated spoil, WAPL will comply with the following measures: - The general environmental duty as an entity engaging in a activity that poses risk of harm to human health and the environment. - Duty to respond to harm (section 31 EP Act) - Duty to notify of incidents (sections 32-33 EP Act) -Duty to manage contamination (section 39 EP Act) - Duty to notify of contaminated land (section 40 EP Act) -Comply with the duties relating to waste (sections 133-135, 139, 140, 142, 143 and 3(1) EP Act).		Environment Inspection Form Waste Register	The HSE Advisor advised no contaminated soil had been encountered to date the time of the audit (16/02/23). The corrective actions register supports this statement as there are no records of contaminated soil (most recent observation/hazard is dated 12/1/23).		Not applicable
	C1	Asbestos in soil Asbestos is often encountered on the soil surface or within fill when clearing and excavations activities occur on infrastructure Projects. If any suspected asbestos is found: - Works will cease in the immediate area - An exclusion zone will be erected around the potential find - A suitably qualified person will be engaged to assess if the find contains asbestos. - If the find contains asbestos, it will be handled, managed and disposed of by a suitably qualified person to a facility licensed to accept asbestos. - Waste tracking certificates will be maintained by WAPL.			HSE advisor advised asbestos was found on the 28/11/22 on valve 5-10. This find was part of the scope of works (not a random find). Asbestos removalist certificate is current, dated 27/10/22, expiring 23rd May 2024. Disposal form dated 28/11/22 verifies 7 m2 of asbestos was disposed of. The Construction Supervisor Permit Issuing Officer advised during the audit that works ceased within the immediate area and an exclusion zone was erected.	Asbestos disposal form & license certificates	Acceptable
	C1	Acid Sulfate Soils There is a low likelihood of encountering ASS on the Project site with the highest chances being within and adjacent to the watercourse / drainage line. A visual inspection will be undertaken when excavation occurs adjacent to the watercourse / drainage line to inspect the spoil for signs of PASS/ASS.In general, if ASS are encountered: - Works will cease, and the potential ASS will either be required in situ to prevent oxidation or kept wet if possible if stockpiled. - A suitably qualified person will investigate the spoil for presence of ASS. - If ASS is present a specific management plan will be developed for the area. - ASS will be handled, managed, transported and disposed in accordance with the site specific management plan developed by a suitably qualified person. - ASS will either be treated onsite if small quantities are present or taken offsite for treatment and disposal at a facility licensed to treat and or dispose of ASS.			HSE advisor advised no ASS had been encountered to date at the time of the audit (16/02/23). The corrective actions register supports this statement as no records of ASS are noted (most recent observation/hazard is dated 12/1/23).		Not applicable
	C1	Contaminated Spoil (PFAS, heavy metals, hydrocarbons etc) In general, if contaminated spoil is encountered: - Avoid exposing or excavating contaminated soil until it is necessary to do so. Stockpile contaminated soil separately to clean soil away from sensitive areas like watercourses, drainage lines or protected habitat. - Implement Erosion and Sediment controls to prevent: o Contaminants from vaporising o Stockpile erosion from wind and water o Generation of dust and sediment o Contaminated run-off - Erect temporary fencing and signage around contaminated soil to prevent site workers from unnecessary contact with contaminated soil. - Consider using odour covers such as tarps for soils generating offensive odours. - Arrange for analysis of contaminated soil be suitably qualified person. - Suitably qualified person to develop site specific management plan if contaminated is found. - Manage, handle, transport and dispose of contaminated soil in accordance with EPA Industrial Waste guidelines.			HSE advisor advised no contaminated soil had been encountered to date at the time of the audit (16/02/23). The corrective actions register supports this statement as there are no records of contaminated soil noted (most recent observation/hazard is dated 12/1/23).		Not applicable

C1	Surplus Excavated Materials It is not expected that the Project will generate surplus excavated material however, if material is unsuitable for reuse during construction, the material will be tested per the 'soil hazard categorisation criteria and disposed of legally.			N/A -This is the scope of a future audit (rehab).		Not applicable
C1	Sewage Effluent produced by Project workers on the Project will be managed to prevent the exposure of human waste to the environment. Toilet facilities supplied by WAPL will be bunded and serviced regularly by licensed operators. Waste transportation certificates will be used to track the transport and disposal of sewage. Sewage management measures include: - Locating toilets in a suitable location away from sensitive receivers, watercourses and drainage lines and in easy access for servicing. - Placing toilet facilities within fenced construction areas where possible to reduce vandalism opportunity. - Visually inspect toilet facilities supplied by WAPL for sewage spills.			Auditors sighted toilets within the fenced construction area, away from sensitive receivers, watercourses and drainage lines the toilets were bunded. Daily checks are conducted to monitor potable water, grey water and toilet water tank levels. Checks between 9/01/23 - 29/01/23 (3 weeks) have been sighted. Burglar Liquid Waste Pty Ltd is used to service the toilet facilities.	Environmental inspections Burglar Liquid Waste invoices (27610 & 27823). Daily checks to monitor potable water, grey water and toilet water tank levels.	Acceptable
C1	Wastewater Wastewater is: - water that has been 'used' for construction purposes - contaminated water The unexpected finds – contamination procedure will be followed if any groundwater found to possibly contain contaminants. If groundwater contains contaminants it will be classified as wastewater. Wastewater that is found to contain contaminants (after NATA lab sampling) w ill be managed in response to the identified contaminants. Once specific contaminants are identified this CEMP will be updated to include specific management measures with input from the EES, APA's CEMP, the Victorian EPA and guideline Civil construction, building and demolition guide.			APA advised that no wastewater has been generated onsite.		Not applicable
C2	Procedure To respond to unforeseen finds that have the potential to: adversely impact human health and the surrounding environment WAPL will implement the following unexpected finds procedure during construction of the WORM Project. 1. Stop works in the area 2. Inform the site Supervisor and APA immediately 3. Isolate the area with a physical barrier 4. Implement temporary control measures 5. Seek advice from a suitably qualified person.		Environment inspection form	HSE advisor advised that nothing unexpected has been found to date at the time of the audit (16/02/23). The corrective actions register confirms no unexpected finds has occurred (most recent observation/hazard is dated 12/1/23). The asbestos find discussed in C1 was part of the planned construction scope of work.		Not applicable
C4	Minimise Risks from Contaminated Groundwater - Develop and implement groundwater management measures in accordance with EMM GW3.		N/A	N/A		Not applicable
C6	Manage Chemicals, Fuels and Hazardous Materials The spoil management measures must include requirements for management of chemicals, fuels and hazardous materials including to: Minimise chemical and fuel storage on site and store hazardous materials and dangerous goods in accordance with the relevant guidelines and requirements.		Hazardous Chemical Register Environment Inspection Form	This commitment needs to be more specific to be auditable.		Not applicable
	Comply with the Victorian WorkCover Authority and Australian Standard AS1940 Storage Handling of Flammable and Combustible Liquids and EPA Victoria publications 1834 Civil construction, building and demolition guide and Publication 1698: Liquid storage and handling guidelines – EPA Victoria.		Hazardous Chemical Register Environment Inspection Form	This commitment needs to be more specific to be auditable.		Not applicable
C6 Chemical storage and handling	All hazardous chemicals and dangerous goods will be stored and handled according to their SDS, applicable Australian Standards and the EA conditions.			The auditors did not have time to cross-reference chemicals and DG stored on site with SDS. It was noted however that there was a chemical and DG cabinet on site that was appropriately used for such goods.		Acceptable
	The chemical contents will be appropriately labelled in accordance with the National Code of Practice for Labelling of Workplace Hazardous Chemicals (July 2020).			There was insufficient time for the auditors to audit this condition.		Not applicable
	All liquid-based chemicals will be stored in approved plastic containers within bunded areas. Volumes stored will be reduced to the minimum required for operations. Bunded area equal to or greater than 110% of the contents.			No liquid-based chemicals were sighted during the inspection.		Not applicable
	Spill kits, SDS, first aid kits and fire extinguishers suitable for containment will be made accessible to all workers.			Auditors sighted readily accessible spill kits, SDS, first aid kits and fire extinguishers during the audit.	Sight inspection.	Acceptable

	Fuel or chemicals will not be stored or handled within 100 m of waterways or within 200m of any wetlands, lakes or springs and will be stored within bunded areas.			Auditors sighted fuels and chemicals stored within chemical lockers away from any waterways, wetlands, springs or lakes.	Sight inspection.	Acceptable
	A register of hazardous goods will be maintained.			Copy of the hazardous substance register has been sighted (excel spreadsheet). The register contains the product name, purpose of use, hazards identification, Risk Assessment needed, issue & renewal date.	hazardous substance register	Acceptable
	The storage and handling will be according to relevant legislation that includes, but not limited to: o AS 1940:2017 The storage and handling of flammable and combustible liquid.			This commitment needs to be more specific to be auditable. There are too many requirements wihin this AS1940 to be auditable with the time available.		Observation
	Fire prevention equipment will be kept on-site and will be made available to all workers.			Site Amenities & Emergency Assembly Area map within the site induction presentation shows fire extinguisher locations. Site Amenities & Emergency Assembly Area map was also hung up in the crib room. Auditors sighted an extinguisher in the crib room and next to the chemical locker.		Acceptable
C6 Fuel storage and refuelling	Refuelling locations will be site specific and will be placed as far as practicable from the drainage line and sensitive receptors.			Auditors sighted a refuelling location outside of the crib room away from drainage lines and sensitive receptors.		Acceptable
	Remote petrol- or diesel-powered pumps located on site will be set within spill trays. They will be fuelled in-situ to lower the risk of associated water spillage caused by connecting and disconnecting water lines to pumps.			Auditors sighted a refuelling location, diesel generators were sighted and self bunded and the pump had a spill tray beneath it.		Acceptable
	No auto lock nozzles are permitted on site.			Auditors did not sight any auto lock nozzles during the audit.		Observation
C6 Transportation	Hazardous goods will be transported by appropriately licenced carriers and according to SDS, relevant Australian Standards and regulatory guidelines. All goods transported shall contain labels, signage, and appropriate packaging.			Auditors have not reviewed any evidence to support this commitment.		Observation
C6 Emergency preparedness	All workers will undergo site specific training and induction, discussing hazards on site, emergency exits, location of safety equipment, and first aid and the emergency response protocol.			Site induction slide show contains the procedure for 'Emergency Response – How to Raise the Alarm', APA Site Emergency Evacuation diagram and Site Amenities & Emergency Assembly Area map (showing first aid, emergency assembly area and spill kits and fire extinguisher locations).The induction also includes the Wasco 12 Non Compromising Rules and APA fatal risks protocols.		Acceptable
C7	Management of Waste Streams Implement the following measures to manage non-hazardous waste: Manage wastes in accordance with the Part 6.4 of the EP Act and the EP Regulations.		Waste Register Environment Inspection Form	This commitment needs to be more specific to be auditable. The Act and regulations are extensive.		Observation
	Undertake an assessment of potential wastes to be generated for the construction phase of the project that identifies waste elimination, reduction measures and opportunities for the re-use and recycle of construction waste.			Auditors have not reviewed any evidence to support this commitment.		Observation
	Use appropriately designated/designed facilities to handle the identified waste streams including necessary segregation and storage requirements. This must include dedicated and labelled on site disposal locations, which segregates wastes into streams for offsite disposal or recycling.			The auditors sighted waste skips and bins on site that were labelled (e.g., scrap meta, scrap wire, general waste bins and skips, cigarette bins and liquid waste bulkis).		Acceptable
	Locate waste facilities away from natural drainage systems and low-lying areas.			Auditors sighted waste facilities away from natural drainage systems and low-lying areas during the audit.		Acceptable

		Prescribed waste (such as waste oils, oily water mixtures, oily rags and oil filters, etc) must be segregated, labelled and securely stored and transported to a facility authorised to receive these wastes (Lawful Place).			Auditors did not sight prescribed waste storage and have not reviewed waste transport certificates.		Observation
		Classify and dispose waste in accordance with the EPA Publication 1827.2 (Waste Classification Protocol), EP Regulations including by using a licensed waste contractor and completing Waste Tracker records for PW.			Auditors did not review waste transport certificates.		Observation
		Carry out a toolbox meeting including specific awareness on chemical management/refuelling and differences between waste types to facilitate correct segregation, storage and disposal.			Refuelling of plant, vehicles and equipment SWMS dated between the middle of 2022 until early 2023 has been sighted. Waste segregation, storage and disposal is covered in the induction.	Refuelling of plant, vehicles and equipment SWMS	Acceptable
		Sufficiently enclose putrescible wastes for odour control (e.g. use of suitable bins).			Auditors sighted bins within the crib room that did not contain lids, however, the bins located just outside the crib rooms did have lids.		Opportunity for improvement
		No PW shall be comingled with other waste streams.			Auditors did not sight any PW waste at the time of the audit.		Acceptable
		Document and implement a detailed process for monitoring, recording and tracking waste handling.			APA advised a waste register is not used for monitoring, recording or tracking waste, however, copies of receipts are kept on file. Availability of waste collection receipts are checked during the environmental inspections.		Opportunity for improvement
		Management of Hydrostatic Test Water WAPL will implement the following measures when managing hydrostatic test water: Follow the Environmental Reference Standards Part 5			APA advised that no hydrotesting has taken place to date (24/05/23).		Not applicable
		Sample water to be used for hydrostatic testing to determine water quality prior to use			APA advised that no hydrotesting has taken place to date (24/05/23).		Not applicable
		Prior to hydrostatic testing, pre-clean the pipeline to remove weld debris, dust and surface scale from the pipeline			APA advised that no hydrotesting has taken place to date (24/05/23).		Not applicable
		Reuse water where practicable to minimise the number of discharge locations and to conserve water			APA advised that no hydrotesting has taken place to date (24/05/23).		Not applicable
		Only discharge hydrostatic test water in approved locations away from the drainage line. APA must be consulted and approve of the discharge location.			APA advised that no hydrotesting has taken place to date (24/05/23).		Not applicable
Greenhouse gas							
19.2.5	CG1	Construction Emissions Reduce greenhouse gas emissions during construction so far as reasonably practicable by: a. Using low embodied energy materials where they are of comparable quality, utility, availability and cost b. Using fuel efficient plant and equipment where practicable during construction c. Using locally sourced materials, including those provided by suppliers, where they are of comparable quality, utility, availability and cost d. Reducing the amount of vegetation removal along the pipeline alignment as far as reasonably practicable e. Monitoring construction greenhouse gas emissions via assessment/monitoring processes f. Mulching trees for recycling			a) auditors have not reviewed evidence for this commitment. b) auditors have not reviewed evidence for this commitment. c) auditors have not reviewed evidence for this commitment. d) the auditors sighted a tree that was intended for removal but is remaining. The auditors did not sight any evidence of removed vegetation outside the construction area. e) Diesel consumption is reported in weekly reports f) auditors did not witness any mulching of trees during the audit.	Weekly report - week ending 5th of Febuary 2023. Weekly report - week ending 12th of Febuary 2023. Weekly report - week ending 11th of September 2022. Weekly report - week ending 24th of July 2022.	Observation
Ground movement							
19.2.6	Ground Movement GM1	Third Party Asset Management WAPL will consult with APA regarding works around their assets and comply with any relevant conditions		N/A	Weekly meeting minutes between APA and WASCO for kick off meeting dated 20 July 2022, teams meeting dated 07/09/2022 and teams meeting 08/02/ 2023 have been sighted. The weekly meeting minutes demonstrate that WAPL and APA discuss the works on a weekly basis and address any issues.		Acceptable

19.2.6	GM2	Design and construction to be informed by geotechnical and hydrogeological conditions Detailed design and construction must be informed by the geotechnical and hydrogeological investigations of ground and groundwater conditions including in relation to: the soil and rock expected to be encountered during all excavations the potential presence of reactive soils the potential presence of sodic and dispersive soils the potential locations and extent of groundwater drawdown Additional investigations must be undertaken if existing investigations are insufficient.		Geotechnical Designs (if required)	Auditors have not reviewed evidence for this commitment.		Observation
19.2.6	GM3	Management of Trench Stability: Support and Duration Carry out trench excavation works in accordance with the requirements of the Safe WorkAustralia Code of Practice: Excavation Work (2018) and WorkSafe Victoria Compliance Code: Excavation (2019). Where potentially unstable ground may compromise the stability of the trench, managementmeasures are to be developed by a suitably qualified geotechnical engineer. In addition, the time that trenches and bell holes remain open will be minimised as far as reasonably practicable. As a general rule, trenches should not remain open for longer than 3 months and should comply with SafeWork Australia (2018). For some excavations (for example for main line valves, hydrostatic test sections and tie-in locations) this time period may be exceeded and trench wall support is to be provided in accordance with SafeWork Australia (2018). Should failure occur, contingency response actions may include, for example, methods for temporary shoring and the removal, replacement, and rehabilitation of the disturbed soil.		Geotechnical Designs (if required)	This commitment needs to be more specific to be auditable; the codes are extensive. In general, the bell hole open for the pipe connection on site appeared to be properly benched and was not shored up with supports. There was some minor slumping at the top of the bell hole. The bell hole was fenced with temporary wire mesh fencing.		Acceptable
19.2.6	GM4	Management of Trench Erosion, Consolidation and Swelling Implement measures to manage soil dispersion, erosion, consolidation and swelling risksincluding: Implementation of erosion and sediment control measures in accordance with EPA 1834 guidelines (2020) and is to be informed by the International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control, Appendix P – Land Based Pipeline Construction (2008). This includes the use of trench breakers installed at regular intervals along the trench excavation where necessary (for example, near to existing slopes and where shallow groundwater tables exist) to minimise ongoing erosion caused by alteredwater flow regimes as a result of trench construction. Compaction of the trench backfill as per APA's performance requirement and/or contractor's construction requirements. Degree of compaction and design of backfill to take into account design load limits on the pipe and density and permeability of surrounding soil. Routine inspection and monitoring of the construction area must be undertaken to identify any issues such as ongoing erosion, ground movement, slope creep or other adverse effects on land use. Management, monitoring and identification of issues may be in accordance with IECA Best Practice Erosion and Sediment Control (2008). Additional erosion control measures in proximity to waterways are contained in EMM SW4. Additional measures for rehabilitation and monitoring of trenched waterways are contained in EMM SW3.		Geotechnical Designs (if required) Project Erosion and Sediment Control Plan	There was no trench open at the time of the audit inspection. There is no detail in the weekly environmental checklists regarding trench inspections. Trench breakers are not necessary as the compressor station site is flat.		Not applicable
Land use							
19.2.7	LU10	Develop and implement biosecurity management measures for the construction phase of the Project in accordance with the Catchment and Land Protection Act 1994.		Environment Inspection Form	This commitment needs to be more specific to be auditable; the Act is extensive.		Observation
19.2.7	LU11	Progressively commence and complete reinstatement as soon as reasonably practicable postconstruction.		Environment Inspection Form	N/A - scope of a future audit (rehab)		Not applicable
19.2.7.1	Land Use Management Measures Earthworks	WAPL will limit any earthworks to allocated area.			Auditors witnessed all earthworks contained within the RoW.	Visual inspection	Acceptable
19.2.7.1		Vehicles will commute on designated tracks and roads.			Auditors witnessed all vehicles commuting on the RoW.	Visual inspection	Acceptable
19.2.7.1		All disturbance works will occur only within the area approved by the APA Disturbance Permit			All disturbance was sighted within the RoW during the audit.		Acceptable
19.2.7.1	Stockpiling	Disturbed soil will be amended as required and reinstated as soon as practicable according to EA conditions.			Auditors did not witness any reinstatement.		Not applicable

19.2.7.1		The battery limits as defined in the approval conditions will be clearly delineated and marked on site prior to the commencement of any earthworks.			The construction site was well delineated with wire mesh fencing and bunting. On the western boundary, the Construction Supervisor stated that fencing had been brought in closer to the construction works to allow for several trees to be protected that were otherwise designated for removed.		Acceptable
19.2.7.1		Any Erosion control measures are to be derived from the APA Erosion and Sediment Control Plan following IECA best practice guidelines.			This commitment needs to be more specific to be auditable; the guidelines are extensive. It was noted that the batters on the southern and western boundaries of the site were stable (well vegetated) with no signs of erosion at the toe of the batters.		Observation
19.2.7.1	Topsoil	Any stockpiling of soil will be designed with minimum slope.			This commitment needs to be more specific to be auditable; what is minimum slope? There was a topsoil stockpile near the bellhole at the northern part of the site that appeared to be of suitable slope (i.e., not steep enough to be actively washing away).		Observation
19.2.7.1		No stockpiles will be located further than 10 m from grass cover or a sediment fence			Auditors did not sight any stockpiles further than 10 m from grass cover or a sediment fence.		Acceptable
19.2.7.1		No stockpiles greater than 2m in height			Auditors did not sight any stockpiles greater than 2 m in height.		Acceptable
19.2.7.1	Soil management	Topsoil will be separated from any subsoil works.			The topsoil stockpile near the bellhole was separated from subsoil.		Acceptable
19.2.7.1	Sediment Control	Work in wet weather will be avoided where practical.			HSE Advisor advised during the audit that work had stopped during a rain event that occurred on earlier in the year.		Acceptable
19.2.7.1		Site based management measures will be implemented according to their potential occurrence following IECA best practice guidelines.			This commitment needs to be more specific to be auditable.		Observation
19.2.7.1	Reinstatement	All disturbed soil shall be reinstated to original profiles as per EA conditions.			N/A - scope of future audit (rehab)		Not applicable
19.2.7.1		Cleared vegetation to be used as per EA conditions, which may include stockpiling or mulching.			N/A - scope of future audit (rehab)		Not applicable
19.2.7.1	Rehabilitation	WAPL may be requested to, or may seek instruction to, rehabilitate the site according to EA requirements.			N/A - scope of future audit (rehab)		Not applicable
Safety							
19.2.8	SA1	<u>Pipeline, MLV and compressor works safety standards</u> Design, construct and operate the pipeline, MLV and compressor works in accordance with AS/NZS 2885, including: - Completion of identification/assessment of threats and mitigating strategies as part of detailed design - Maintenance and inspections of the pipeline in accordance with APA procedures and AS/NZS 2885. - Maintain and inspect the MLVs and the Wollert compressor station at a frequency in accordance with APA's monitoring regime and procedures. This must include vegetation management, valve and compressor operation and corrective maintenance		Environment Inspection Form	Out of audit scope - only a suitably qualified and experienced pipeline engineer can audit against this.		Not applicable
19.2.8	SA3	<u>Fire protection</u> Develop and implement a Health and Safety Management Plan that requires: - Provision of active fire protection and suppression for liquid fires in the turbine enclosure - Storage of diesel in storage tanks in accordance with AS 1940:2017 and provision of foam for firefighting purposes at diesel stations and implementation of routine monitoring to manage the risk of any fire events. - Manage diesel in accordance with the HSEMS, including the creation of Emergency Response Plan(s).		Environment Inspection Form	Wasco prepared a Construction Health and Safety Management Plan. Section 29.13 of the plan addresses fire prevention, outlining the Construction Supervisor's responsibilities without specifying the requirements of this condition. On site, diesel was stored in self-bunded diesel units. An ERP is appended to the Wasco CEMP. The auditors did not enter the turbine enclosure area on the instruction of the Construction Supervisor.	Construction Health and Safety Management Plan (2166-HSS-PLN-001, Rev 0, 9/9/22)	Acceptable

19.2.8	SA4	Emergency response plans Develop and implement emergency response plans, such as for spills, for both the construction and operations phases of the Project.		Emergency Response Plan	Emergency Response Plan (2166-HSS-PLN-004) has been sighted and contains an emergency reponse for spills. The plan applies to all WAPL operations. APA advised no incidents have occurred to date (24/05/23), therefore, implementation of this commitment can not be verified.		Acceptable
19.2.8	SA5	Bushfire Management Plan Review and update the existing APA Bushfire Management Plan to consider the new infrastructure introduced by the WORM Project in consultation with relevant stakeholders including the Country Fire Authority and Fire Rescue Victoria.		APA's Bushfire Management Plan	N/A - scope of future audit (post-construction)		Not applicable
Social							
19.2.9	S1	Reduce community disruption: Construct the Project in accordance with EMMs AQ1, AQ3, B7, LV1, LV2, LV5, NV1, NV2, NV3, NV4, NV5, NV6, and NV7 to minimise risks of harm from noise, vibration, air quality, and landscape and visual amenity impacts to residents directly adjacent to the alignment, community facilities and recreation areas as far as reasonably practicable.		Environment Inspection Form	See EMMs AQ1, AQ3, B7, LV1, LV2, LV5, NV1, NV2, NV3, NV4, NV5, NV6, and NV7.		Acceptable
19.2.9	S5	Source workers, supplies and services during construction from the regional study area as far as reasonably practicable. Support regional employment and purchasing by requiring the main construction contractor to detail mechanisms to provide for regional employment and purchasing during the tender phase. The adequacy of this plan must be a consideration in the selection of the preferred construction contractor. Once engaged, contractors must be required to report on performance against set criteria.		Procurement Policy	This commitment is outside of the scope of this audit (not environment related).		Not applicable
Surface water							
19.2.10	SW1	Managing runoff from adjacent construction areas, discharge from dewatering activities and spills / leaks Implement measures to minimise risks of harm so far as reasonably practicable on downstream environments due to construction activities and potential runoff. This is to be in accordance with EPA Publication 1834: Civil construction, building and demolition guidance, Publication 1894: Manage soil disturbance, Publication 1895: Manage stockpiles, Publication 1896: Manage how you work within or adjacent to waterways and Publication 1897: Manage truck and other vehicle movement, including: Form discrete stockpile segments (i.e. rather than a continuous row of stockpile materials) to prevent causing water to pond on the upstream side.		Environment Inspection Form Project Erosion and Sediment Control Plan	The topsoil and subsoil stockpiles on site were discreet (non-contiguous) and did appear to have led to water ponding. By extension, it is therefore assumed that the EPA publications have been followed. **Observation:** This commitment needs to be more specific to be auditable; the EPA publications contain extensive guidance that forms a mini audit in itself.		Acceptable
19.2.10		Where drainage lines intersect the construction corridor, place flow diversion measures upstream of soil stockpiles.			The Construction Supervisor stated that in heavy rains, the northern portion of the site (away from the compressors) is subject to flooding, so there is likely a natural drainage line intersecting the site. However, there were no flow diversion measures sighted to be installed upstream (eastern side) of the site, which was acceptable given the few small stockpiles on site.		Not applicable
19.2.10		Direct surface water runoff from external catchments through regular gaps in soil stockpiles where erosion and sediment controls are installed to allow runoff to pass over the construction corridor at a controlled location without causing erosion.			As above.		Not applicable
19.2.10		Implement erosion and sediment controls for the site with reference to International Erosion Control Association Best Practice Erosion and Sediment Control, Appendix P – Land Based Pipeline Construction (IECA, 2008).			The topsoil and subsoil stockpiles on site were discreet (non-contiguous) and did appear to be actively washing away/eroding. See previous comments regarding the stable nature of the southern and western batters. **Observation:** This commitment needs to be more specific to be auditable; the IECA publication contains extensive guidance (86 pg document) that forms a mini audit in itself.		Acceptable
19.2.10		Manage non-contaminated groundwater and surface water run-off that enters the open trenches and bell holes in accordance with EPA Publication 1834 Civil Construction, building and demolition guide (November 2020).			This commitment needs to be more specific to be auditable; the IECA publication contains extensive guidance (86 pg document) that forms a mini audit in itself.		Observation

19.2.10		Where surface water run-off and rainfall collect in trenches and is to be dewatered, test turbidity, salinity and pH prior to discharge to land. Treat water if parameters exceed the objectives in the Environment Reference Standard. Treatment options include, but are not limited to filtration, and the addition of flocculants or pH buffers as appropriate. Discharge to land (i.e. grass filtration) must not occur within 100 metres of watercourses. Where the water cannot be treated to the required standard it is to be removed from site for disposal in accordance with EPA Publication 1828.2.			At the time of the audit, the open bellhole did not contain water. The environmental inspection checklists do not contain any checks for this, so compliance cannot be determined.	Environmental inspection checklists	Observation
19.2.10		Potentially contaminated trench water is to be assessed and managed in accordance with NEPM ASC, NEMP v2.0, EPA Publication 1828.2 and other EPA guidance as appropriate.			As above. This commitment needs to be more specific to be auditable; the NEPMs and EPA publications contain extensive guidance that forms a mini audit in itself.		Observation
Groundwater							
19.2.11	GW4	Managing unexpected groundwater encountered during construction The following actions are required before any dewatering occurs when unexpected groundwater is encountered during construction: - Review contamination risks in relation to the unexpected groundwater and undertaketesting to determine appropriate management and disposal options. - Review the construction methodology and change if appropriate. - Undertake other measures as necessary to meet the requirements of other relevant EMMs, including the groundwater EMMs GW1 and GW3 (APA CEMP) and the contamination EMMs C2, C3 and C4 (APA CEMP).		Environment Inspection Form Project Erosion and Sediment Control Plan	As per 19.2.10.		Observation
Fuels and chemicals							
19.2.12	F1	All fuels and chemicals must be stored and handled to comply with the following: - Australian Standard AS1940:2004: The storage and handling of flammable and combustible materials. - EPA Publication 1698: Liquid Storage and Handling Guidelines. - Victorian Worksafe Codes of Practice. - Manufacturer's instructions. - Relevant safety data sheets.		Environment Inspection Form	There were minimal fuels and chemicals stored within the construction footprint. The diesel refuelling station was self-bunded with a drip tray for the fuel nozzle. **Observation:** This commitment needs to be more specific to be auditable; the guidelines listed contain extensive guidance that forms a mini audit in itself.		Observation
19.2.12	F2	Safety data sheets must be available for reference for all fuels and chemicals at the storage location.		SDS Records (at Hazardous Chemical Container)	Auditors sighted safety data sheets at fuel and chemical storage sheds.		Acceptable
19.2.12	F3	The volume of liquid material (fuel, oil, lubricant) required on-site for construction activities is to be limited to only that which is required		Environment Inspection Form	The auditors only sighted fuels, lubricants and oils in storage sheds at the compressor site, which is where it's required.		Acceptable
19.2.12	F4	All liquid material must be stored within containment facilities (e.g. bunded areas, leak proof trays) at a designated area within the site.		Environment Inspection Form	No liquid material was sighted outside of contained facilities during the audit (i.e., storage sheds).		Acceptable
19.2.12	F5	Where flammable or combustible chemicals are required to be stored on-site, fire-fighting equipment proportionate to the risk of the materials stored must be available for the duration of the material storage.		Environment Inspection Form	Fire extinguisher locations are outlined on the Site Amenities & Emergency Assembly Area map is within the induction and was hung in the crib. The locations are; both offices (APA & WASCO) and within the site container.		Acceptable
19.2.12	F6	Vehicle and equipment inspections must be undertaken to check for oil, lubricant or fuel leaks and general wear and tear of hoses.		Environment Inspection Form	Environment inpsection form contains a check for plant and equipment being well maintaned (i.e., leak checks and smoky exhaust emissions).		Acceptable
19.2.12	F7	Spill kits must be available at all work sites, refuelling points and fuel and chemicals storage locations.		Environment Inspection Form	Spill kits were sighted at work sites, refuelling points and fuel and chemicals storage during the audit. Example environmental inspections sighted all contain acceptable checks for spill kit location & adequacy.		Acceptable
19.2.12	F8	Should a spill/release occur the Contingency Plan for chemical/Fuel Spill Response must be followed		Environment Inspection Form Incident Report Form	The corrective actions register notes a spill occurred on 6/12/22 at the laydown area. However, no incident report has been provided and therefore auditors are unable to check if the Contingency Plan for chemical/Fuel Spill was followed.		Opportunity for improvement
Waste management							
19.2.13	W1	Waste management must comply with the EPA waste hierarchy - waste avoidance, waste-use, waste recycling, and waste disposal.		Environment Inspection Form	Auditors witnessed the EPA waste hierarchy being implemented through re-cycling of wooden pallets for waste storage and waste disposal containers were present on sight.		Acceptable

W2	The site must be kept free of litter and waste and refuse containers or skip bins must be located at designated storage areas. Skip bins are to be covered to prevent access by fauna and pest species.		Environment Inspection Form	Auditors did not witness any litter during the audit and sighted skip bins correctly sealed with lids. Example environmental inspections sighted all contain acceptable house keeping and skip bin location checks.		Acceptable
W3	General waste to be removed from site by crews. Surplus or waste materials to be stockpiled at laydown areas for regular collection.		Environment Inspection Form	The auditors sighted the laydown area (southern end of the site) with surplus waste stockpiled waiting for collection.		Acceptable
W4	Separate, labelled general and regulated waste bins must be available. An EPA licensed contractor must collect regulated waste for recycling or licensed disposal.		Environment Inspection Form	Auditors sighted a large general waste skip bin that was clearly labelled. Regulated waste bins were not sighted, however, sewerage waste is collected and disposed of by Burglar Liquid Waste Pty Ltd. HSE advisor advised collection occurs approximately every three days.	Burglar Liquid Waste invoices (27610 & 27823).	Acceptable
W5	Spill kits are to be available at regulated waste storage areas		Environment Inspection Form	Spill kits were sighted during the audit. Example environmental inspections contain acceptable checks for spill kit location & adequacy.	Sight inspection Environmental inspection check lists.	Acceptable
W6	Disposal of any waste contaminated soil must be undertaken in accordance with EPA Publications IWRG 821: Waste Transport Certificates and IWRG 822: Waste Codes and must require the use of EPA-registered trucks for transport of the soil to appropriately licensed landfills. Contaminated soil must be remediated or disposed of at an EPA approved facility in accordance with EPA waste disposal guidelines.		Environment Inspection Form	The only record available to the auditors regarding contaminated soil removal relates to asbetsos removal. Documentation states the contaminated soil was disposed of at Duston Downs waste facility. The Gippsland Regional Organics website states their Dutson Downs landholding operates a dedicated asbestos landfill that is licenced under EPA. **Observation:** This commitment needs to be more specific to be auditable; the EPA guidelines listed contain extensive guidance that forms a mini audit in itself.	Asbestos disposal form https://www.gippswater.com.au/gippsland-regional-organics-commercial	Acceptable
W7	Toilets at the construction depot must be a self-bunded portable blocks. Clearing of portable toilet facilities, including waste collection and disposal, must be undertaken by a licensed waste contractor.		Environment Inspection Form	Auditors sighted self-bunded portable toilet blocks during the audit. Waste collection and disposal is conducted by Burglar Liquid Waste Pty Ltd. HSE advisor advised collection occurs approximately every three days.	Burglar Liquid Waste invoices (27610 & 27823).	Acceptable
W8	Appropriate receptacles must be provided and used for cigarette butt disposal.		Environment Inspection Form	Cigarette receptacles were sighted during the audit within the smoking area.		Acceptable

65	Acceptable
1	Major non-conformance
0	Minor non-conformance
22	Observation
4	Opportunity for improvement
45	Not applicable
137	**TOTAL**

WORM Commitments Register (Deep Creek SSEMP Rev1)

KP 16.8 – HDD at Deep Creek (east side, off Wildwood Road)

Document Section	Title	Extract	Commitment	Evidence of Compliance	Aventus comments/findings	Document reference	Compliant?
Melbourne Water Corporation Crossing Conditions							
6	MELBOURNE WATER CORPORATION PERMITS	APA have been granted 'Creek Crossing Approval') by Melbourne Water Corporation (MWC) for all water crossings along the WORM alignment subject to the following conditions:	Provisions for diverting flow must be available at watercourse crossings	Deep Creek crossing methodology is HDD, therefore, no flow diversion is required.	Auditors sighted HHD occurring at Deep Creek.		Acceptable
6			Depth of crossing beneath Curly Sedge Creek culvert comply with Melbourne Water 'guideline for utility crossings under pipes'	N/A for Deep Creek crossing	N/A		Not applicable
6			Prior to commencement of construction, a SSEMP must address: - Sediment and silt management controls - Vegetation management techniques - Access tracks - Machinery / plant locations - Exclusion fencing around native vegetation / habitat	This document for Deep Creek crossing and Deep Creek SSESCP.	The Deep Creek SSEMP addresses the MWC requirements.		Acceptable
6			Prior to commencement of construction, the contractor undertaking the works must produce a Work Method Statement and a Task Risk Assessment. The statement must address the following: - OH&S measures in place to reduce risk - Safe work practises - Process for machinery to access the creek - Diversion of flows for low and high flows - Evacuation procedure during times of high flows and fire danger periods	Appendix A Appendix F – SCA will undertake SLAM risk assessment prior to undertaking activity.	Appendix A and Appendix F outline OH&S training and safety procedures that are undertaken prior to works commencing.		Acceptable
6			Melbourne Water must maintain unobstructed access to the waterways at all times for operational purposes. The works area must be kept to a minimum and clearly defined on-site, thus creating a clear path for Melbourne Water to access the reserve/waterway.	Access will be available via SCA access tracks and the RoW. Melbourne Water will be required to notify APA / SCA prior to entering construction boundary to comply with SCA and APA safety requirements.	Access tracks and RoW were present on sight.		Acceptable
6			Fill resulting from excavation works must be stockpiled in an area outside any existing floodplain. Excess fill must be removed off site at the expense of the Project.	All fill at Deep Creek will be stockpiled above the floodplain. Refer to Appendix D.	Topsoil was stockpiled outside of the floodplain.		Acceptable
6			Any disturbance to areas along a declared waterway reserve or private property must be kept to a minimum and reinstated as near as practicable to its former condition. Reinstatement will include but not limited to the following: - Backfill, levelling and compaction; - Clean-up of site; - Re-grading any access tracks; - Top soiling and seeding of grassed areas (only if disturbed)	Section 8 Section 9 Section 12	Auditors did not witness reinstatement activities.		Not applicable
6			Melbourne Water must not be represented in negotiations for access into private property. Access must be negotiated between the developer and the affected property owners.	Noted			Not applicable
6			Melbourne Water is indemnified from any claims of injury or damage arising from the proposed works. Melbourne Water is indemnified from and against all liabilities, losses, damages, costs or expenses directly or indirectly incurred from the subject works, its officers, employees or authorised agents as a result of the works.	Noted			Not applicable
6			Please note the proposed works may trigger approval requirements concerning environmental, biodiversity and cultural heritage controls. Accordingly, you are advised to consult with the following authorities and agencies: Department of Environment, Land, Water and Planning (DELWP), Office of Aboriginal Affairs Victoria (OAAV), Heritage Victoria and Municipal Council.	APA have obtained all required environment and cultural Heritage approvals for the WORM Project.			Acceptable
CONSTRUCTION METHODOLOGY							
7		Deep Creek watercourse will be constructed using the Horizontal Directional Drilling (HDD) Deep Creek HDD will involve: Clear and grading hard stand area for the HDD entry and exit pads on either side of Deep Creek			The auditors witnessed HDD occuring at Deep Creek (entry pad site). The site was cleared and graded.		Acceptable
7		Establishing an earthern bund around downslope of all HDD facilities (i.e. drill rig, all fluid storage areas and entry / exit pits).			Earthern bund was present around the entire HDD site.		Acceptable

7		Installing water diversion drains or bunds at the upslope of all HDD facilities including HDD drill rig, drilling fluid storage areas and entry / exit pits.			Mud and cutting pits were self bunded Eastern cuttings drying pond installed. No leaks visible.		Acceptable
7		Preparing the entry and exit pads and establishing erosion and sediment controls, temporary fencing / flagging, and signage for 'no-go zones' (refer to Appendix C for Deep Creek 'no-go zone'), establishing Tree Protection Zones (TPZ's) around trees within or adjacent to the RoW that are not to be cleared as part of the works. o The entry pad will have the drill rig (with drilling fluid), drill pipe and entry pit with surplus spoil used to build an earthern berm around the entry pit. o The exit pad will have the exit site with either an exit pit or turkey's nest to contain drill muds for return and the welded pipe section to be pulled back through the drilled bore hole.			Auditors sighted HDD entry pad with the following controls in place: earthern bund around the entry pit. temporary flagging/fencing around the rig and pit. TPZs were not present at this sight.		Acceptable
7		Run the surface mud return line overland and through Deep Creek with adequate sandbags to hold the mud return line in place. The surface mud return line will be used to connect the exit pad with the entry pad to recycle the drill mud.			Auditors did not sight the entire creek to verify that the surface mud return line was overland with adequate sandbags to hold it in place. **OFI:** the daily checklists do not have detailed HDD checks relating to this commitment.		Observation
7		Drill the pilot hole for the HDD line. Ream as required.			Auditors did not sight drilling of the pilot hole and have not reviewed any evidence to support this commitment.		Observation
7		Pullback the pipe section through the HDD drilled bore hole.			Auditors did not sight this stage of HDD and have not reviewed any evidence to support this commitment.		Observation
7.1	Surface Mud Return Line	The mud return line will be high pressure poly line with a diameter of approx. 160mm			This commitment is not within the auditor's scope.		Not applicable
7.1	Surface Mud Return Line	The mud return line will be secured with sandbags within the restricted construction corridor between the HDD entry and exit pits.			Auditors did not sight the entire creek (i.e., the distance between the HDD entry and exit pads) to verify that the surface mud return line was secured with sandbags. **OFI:** the daily checklists do not have detailed HDD checks relating to this commitment.		Observation
7.1	Surface Mud Return Line	The mud return line will be run through a larger high pressure poly line when crossing Deep Creek.			This commitment is not within the auditor's scope		Not applicable
7.1	Surface Mud Return Line	The larger casing poly pipe will be extended 10m each side of the banks of the watercourse and will have a sandbag bund placed around each end to contain any potential mud spills.			The auditors did not sight the Creek's banks or review any evidence for this commitment.		Observation
7.1	Surface Mud Return Line	The surface mud return line will be installed an by: 1. Prefabricate encasing pipe within the activity area and pull with tow rope and power winch through the watercourse. 2. Tie the encasing pipe to a large established tree which can support the encasing pipe's weight using a soft rope (i.e. not a metal chain) or fabric tie downs with tree trunk protectors in place to prevent the rope cutting into or rubbing against the tree. 3. Pull with power winch the surface mud return line in 100m sections through the encasing pipe and connect with couplers. 4. Install sandbags at appropriate locations to restrain within restricted work area. 5. Conduct an integrity test of the surface line with clean potable water. 6. Operate the surface mud return line as required.			The auditors did not witness the intallation of the surface mud return line or review any evidence to support the provisions within this commitment.		Observation
7.1	Surface Mud Return Line	To remove the surface mud return line: 1. Add a foam PIG to the surface mud return line. 2. Connect the surface mud return line to clean water. 3. Flush the surface mud return line of all drilling fluids with the foam PIG and clean potable water. 4. Break the couplers either side of the 100m surface mud return line section traversing the watercourse. 5. Pull the 100m section with encasing pipe through the watercourse and secure within work area			The auditors did not witness the removal of the surface mud return line or review any evidence to support the provisions within this commitment.		Observation
7.1	Surface Mud Return Line	A Trigger Action Response Plan (TARP) for the removal of the mud return line will be used in the event of inclement weather occurring while the mud return line is active over Deep Creek.			Auditors have not reviewed evidence for this commitment.		Observation
WEATHER FORECAST AND TIMING OF WORKS							

8		The weather forecast will be continually monitored prior to HDD activities and site establishment at Deep Creek to inform site management measures, including the implementation of the Site Specific Erosion and SCP and the TARPs.			Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** auditors have not reviewed any evidence that the weather forecast has informed site management measures, including the implementation of the Site Specific Erosion and SCP and the TARPs.		Acceptable
VEGETATION MANAGEMENT							
9		Vegetation Management will occur in accordance with SCA's CEMP and Tree Management Plan. Due to the crossing at Deep Creek being a HDD, minimal disturbance to riparian vegetation is required.			Auditors did not see any evidence of vegetation clearing outside the HDD area. No riparian vegetation was present at the HDD site. No TPZ were present at the HDD site.		Acceptable
SEDIMENT AND EROSION CONTROL							
10		A Site Specific Erosion and Sediment Control Plan (SSESCP) will be prepared for HDD works at Deep Creek and signed off by a suitably qualified person or Certified Practitioner in Erosion and Sediment Control (CPESC). The SSESCP will be a sub plan to the WORM Overarching Erosion and Sediment Control Plan (OESCP).			The Worm Primary Erosion and Sediment Control Plan (Rev B dated 4/11/22, 18035-PL-HSE-0017) has been sighted. **OFI:** the site specific plan is not attached to the primary ESC plan.		Opportunity for improvement
10		Deep Creek SSECP will include detailed information on: Access Tracks All access tracks used by SCA will be within the Project's approved activity area. SCA will construct access tracks in accordance with IECA BPESC (2008) and maintain access tracks throughout construction.			Auditors sighted access tracks within the projects approved activity area.		Acceptable
10		Spoil stockpiling locations and indicative Erosion and Sediment Control (ESC) around stockpiles Stockpile locations will be located within the Project's approved RoW and be a minimum of 20m away from watercourse / drainage lines and have appropriate erosion and sediment controls installed on the down slope of stockpiles			Auditors sighted a large topsoil stockpile within the RoW, 20 m away from watercourse/ drainage lines Sediment controls observed were: sediment fencing and bunding.		Acceptable
10		Approximate machinery / plant locations The HDD drill rig will be positioned on a graded surface at the entry pad behind the entry pit. Plant and machinery will be parked up when not in use a minimum of 20m away from the banks of watercourses and drainage lines. Spill equipment will be stored at the entry / exit pads adjacent to the plant and equipment laydowns.			Auditors sighted the HDD rig positioned behind the entry pit on a graded surface. Spill kit was present on site.		Acceptable
10		Establishment of no go zones / tree protection zones and exclusion zones around native vegetation and habitat. The Project's site boundary will be staked out by survey prior to construction access.			The sight did not contain no go zones/tree protection zones and exclusion zones around native vegetation and habitat.		Not applicable
10		Sodic Soil and Ground Movement Management Measures SCA's Sodic and Dispersive Soils Management Plan has identified all subsoils along the Project alignment as highly dispersive. All subsoils excavated during works will be ameliorated with Gypsum prior to reinstatement and trench backfill at an application rate of 10kg/m3.			The auditors did not witness any amelioration reinstatement at this sight.		Not applicable
EVACUATION PROCEDURE FOR PEOPLE AND PLANT							
11		During the Deep Creek HDD works, the weather will be monitored with a focus on incoming rainfall with the potential to cause surface flow and flooding. In the event of flash flooding events: - Stabilise work area, remove hazardous chemicals and any portable toilets etc -Move equipment/plant to a higher area clear of watercourse / drainage line if safe to do so. -Maintain contact with the Site Office, cease work and proceed as directed. -If site / access roads are covered by flood water, don't panic. Don't attempt to drive through deep / flowing water. If roads are cut off, notify Site Office by radio or phone and remain where you are. - In the event of the isolation of crews away from their accommodation, emergency evacuation to alternative accommodation may be required. - Project Manager will coordinate evacuation of all personnel to a safe area if required. - Project Manager shall continue to monitor information from local weather authorities and respond as directed (this could also be through liaison with the State Emergency Service, Police, etc). -Determine and request further resources as may be required.	Follow SCA's Emergency Response Plan (18035-PL-ER-0002) for all Emergencies.		No records of flash flooding at Deep Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). Therefore, the procedure outlined in column C has not been activated.		Not applicable

11.1	Flood Warning and Evacuation Management Procedure	Manage flood risk during construction flood risk during construction including end of day requirements to limit flood risk exposure overnight. Limiting footprint of disturbance of works within waterways and floodplains to limit flood risk exposure at any point in time to the extent reasonably practicable.	Develop and implement SSESCP in accordance with the IECA BPESC (2008) Guidelines.		It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the Worm Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
11.1		Placement of construction equipment and stockpile materials above threshold flood levels. Flood warning communication protocols and emergency response procedures.	Continually monitor the weather forecast. If rainfall is predicted overnight, remove all equipment and plant from within the watercourse and store outside watercourse / drainage line bank.		Weather is tracked daily within the environmental aspects register (Melbourne Airport). Rainfall is recorded in the environmental aspects register. **Observation:** auditors have not reviewed evidence of the removal of all equipment and plant from within the watercourse and storage outside watercourse/drainage line bank when rain was anticipated.		Observation
11.1			Minimise the area of exposed soils with progressive reinstatement.		Auditors did not witness any reinstatement at the time of the audit.		Not applicable
11.1			Implement monitoring program and maintenance measures as required		Daily inspection reports demonstrates the site is monitored daily and any flagged items are recorded.	Daily inspection checklist dated 19/11/22 and 20/12/22	Acceptable
11.1			Only clear and disturb areas within the construction footprint and limit disturbance wherever possible to reduce erosion and sedimentation.		Auditors did not sight an evidence of disturbance outside the construction footprint. No records of any disturbance outside the RoW at Deep Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).		Not applicable
MONITORING							
14		HDD activities have a low likelihood of causing instream water quality impacts, therefore, water quality monitoring will occur by daily visual observation of water quality during the Deep Creek HDD. The visual water quality observation will be required in the Daily Environment Inspection.		Daily Environment Inspection checklist.	Daily inspection checklists for Deep Creek do not address water quality checks and the environmental aspects register also does not contain water quality visual checks.	Daily inspection checklist dated 19/11/22 and 20/12/22	Major non-conformance
14		Any observation of contamination, pollution or sedimentation will be recorded and investigated to identify the cause. If Project construction is the cause, corrective actions will be used to manage the impact.		Daily Environment Inspection checklist.	Daily inspection checklists for Deep Creek do not address water quality checks, so it cannot be determined whether contamination, pollution or sedimentation of the creek occurred.	Daily inspection checklist dated 19/11/22 and 20/12/22	Major non-conformance
PERFORMANCE INDICATORS							
15	Surface Water Flows	Control and manage drainage, erosion and sediment within construction footprint. Manage surface water flows and water discharges to avoid altered hydrology and impacts to watercourses. Minimise impacts to biodiversity relevant to water, including riparian vegetation and aquatic ecosystems.	Construction of the HDD entry and exit pads is to be undertaken in accordance with the CEMP and a SSESCP.		It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the WORM Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
15	Sediment and/or vegetative material	Minimise impacts to surface water quality as a result of sedimentation. Control and manage drainage, erosion and sediment within construction footprint. Manage surface water flows and water discharges to avoid altered hydrology and impacts to watercourses.	Develop and implement SSESCP in accordance with the IECA BPESC (2008) Guidelines.	SSESCP	The auditors did not visit the creek watercourse, only the entry pad site. **Observation:** it is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the WORM Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
15			The SSESCP is to include inclement weather controls if rainfall is predicted	SSESCP	It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the WORM Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
15			Minimise the area of exposed soils with progressive reinstatement.		Auditors did not witness reinstatement activities.		Not applicable
15			Implement monitoring program and maintenance measures as required	Daily Environment Inspection checklist	Daily inspection checklists contain checks for the RoW, house keeping & sanitation, chemical management, Air Quality, Noise & Vibration, Fauna & Flora Management and HDD.	Daily inspection checklist dated 19/11/22 and 20/12/22	Acceptable
15	HDD	To plan for and manage environmental impacts associated with the proposed HDD and thrust boring activities. No loss of material or contamination of land or water outside of the designated work areas.	Develop and implement SSESCP in accordance with the IECA BPESC (2008) Guidelines.	SSESCP	It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the WORM Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation

15			The SSESCP is to include inclement weather controls if rainfall is predicted	SSESCP	It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the WORM Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
15			Follow the HDD Work Method Statement		Auditors have not reviewed evidence for this commitment.		Observation
15			Install earthern bunds around the downslope of all HDD facilities to contain all drill fluids		Auditors sighted earthern bund around the HDD facility.		Acceptable
15			Install flow diversion at the upslope of all HDD facilities to divert stormwater runoff from mixing with drilling fluid		Earthern berms we present at the upslope section of the HDD entry pad.		Acceptable
15			Monitor HDD activities and entry / exit sumps daily		Daily inspection provided for HDD Deep Creek 20th of December 2022 contains a check for whether runoff sump pits are used, however, no other specific checks have been sighted for monitoring of the runoff sump pits.		Observation
15			Response efficiently and effectively to all spills, uncontrolled releases and hydrofractures during HDD activities		The corrective actions register does not contain any incidents at Deep Creek, however, the incident register records the following reportable incidents: - Deep HDD spill on 23/03/23 - Deep frac out on 15/03/23 And one near miss 'drill fluid loss Deep Creek' on the 14/03/23. **OFI:** No reports have been sighted for the reportable incidents, therefore the auditors are unable to confirm if the spills were responded to efficiently.		Opportunity for improvement
15			Aim to use benign HDD fluids that are inert and non-toxic to reduce risk of contamination to land and water		Auditors have not reviewed evidence for this commitment		Observation
15			Follow and implement TARP for HDD activities		Auditors have not reviewed evidence for this commitment		Observation
APPENDIX A: HDD WORK METHOD STATEMENT							
1	Prior to works commencing	Provide training to personnel and sub contractors involved	All construction personnel to complete the Project Induction		The induction register verifies all personnel have been inducted.		Acceptable
1			Toolbox Project Engineers and Supervisors on: o the requirements of this EWMS relevant to the work activity. o all procedures/registers/checklists/forms relevant to the work activity. o on SSESCP relevant to the work activity and work location. o on the locations of sensitive receivers relevant to the work activity and work location. o on the Flood Warning and Evacuation Management Procedure		Auditors have not reviewed evidence for this commitment.		Observation
1			Personnel involved in dewatering will be trained and comply with the Project CEMP requirements for dewatering to land including: o Water quality monitoring requirements o Dewatering locations o Erosion and sediment controls for dewatering o Monitoring of dewatering activities o Refuelling and storage of hydrocarbons during dewatering		Auditors have not reviewed evidence for this commitment.		Observation
1			Ensure construction personnel are inducted and receive ongoing training on: o Water quality management o Incident reporting o Identification of ASS / PASS and personal obligations to report excavated ASS or PASS o Soil conservation issues and erosion and sediment control systems including installation and maintenance and SSECP controls o Spill response procedures.		The induction register verifies all personnel have been inducted. **Observation:** auditors have not reviewed evidence that ongoing training has occurred for the provisions outlined in column D.		Observation
1			Ensure Project engineers and site personnel responsible for construction and maintenance of temporary erosion controls undergo specific Erosion and Sediment Control training.		Auditors have not reviewed evidence for this commitment.		Observation
1			Maintain records of all environmental training provided.		Copy of certificate (SHLA01326) in reptile and venomous snake handling (22500VIC) attained on the 07/09/22 by the Spiecapag Environment Advisor has been sighted. The following documents have been sighted for the fauna spotter catcher (Richard Swindells): - wildlife control licence (licence no. 14918164CX) exp: 30/06/23 - ACM30117 Certificate III in Animal Studies - letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue **Observation:** Auditors have not reviewed any other evidene relating to environmental training.		Acceptable
2		Planning of Works	SCA Environment Team to be involved in planning and consulted prior to commencement of any required dewatering activities.		Auditors have not reviewed evidence for this commitment.		Observation

			Any tree clearing required for the HDD entry or exit pads will occur per the Fauna Management Plan and a Fauna Spotter Catcher with Wildlife Management Authorisation will be onsite during clearing to conduct pre-clearance inspections of any habitat and manage any identified fauna.		Auditors have not reviewed evidence for this commitment.		Observation
			Confirm that a SSESCP has been developed and signed off by the Environmental Manager.	SSESCP	**Observation:** is is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the Worm Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
			Identify nearest sensitive receivers prior to works and plan works accordingly.		Cultural heritage site was fenced off with signage.		Acceptable
			No dewatering activities to affect landholder property or exacerbate flood risk		Auditors have not reviewed evidence for this commitment.		Observation
			Obtain permission to access private property prior to the commencement of works if required.		Auditors have not reviewed evidence for this commitment.		Observation
			Sensitive areas within 50m of designated works to be clearly delineated and sign posted.		Cultural heritage site was fenced off with signage.		Acceptable
			Fluorescent Orange flagging (or similar) on star pickets will be utilised to delineate sensitive areas. No-go signage to be installed at 50m intervals along the flagging.		Cultural heritage site was fenced off with temporary fencing and signage, however, no flagging was present.		Opportunity for improvement
			Sensitive area fencing to be inspected and tool-boxed by the Environmental Officer prior to any commencement of works in the area.	TBT sensitive area	Auditors have not reviewed evidence for this commitment.		Observation
			During construction boundary fencing is to be maintained as required.		Construction boundary fencing was intact during the audit.		Acceptable
			No works to be conducted outside the contractor clearing limits not permitted by the Cultural Heritage Management Plans (e.g. running mud return lines between the entry and exit pads within the restricted works area).		All works were being conducted within the restricted works area at the time of the audit.		Acceptable
			No access is permitted outside the Approved Project Boundary.		No access outside of the project boundary was witnessed during the audit.		Acceptable
			Consider weather conditions on day prior to commencing work and prepare the work area for upcoming major rain event (audit controls, status of work area etc). If the forecast for rain is a 90% chance of rainfall equal to or greater than 10mm (24-hour period), the Environment Team is to review environmental controls with the Site Supervisor and undertake any actions required as per SSESCP.		Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** auditors have not reviewed evidence for this commitment, i.e; records of the Environment Team reviewing environmental controls with the Site Supervisor and undertaking any actions required as per SSESCP when the forecast for rain is a 80% chance of rainfall equal to or greater than 20mm (24-hour period).		Observation
			Follow all TARPS for Jacksons Creek HDD		Auditors have not reviewed any evidence for this commitment.		Observation
			Dewatering equipment and system are to be inspected prior to each use and regularly monitored throughout dewatering activities to working condition.		Auditors did not witness any dewatering at the time of the audit and have not reviewed any evidence to support this commitment.		Observation
			Foot valves are to be checked and used during dewatering to reduce sediment mobilisation		Auditors did not witness any dewatering at the time of the audit and have not reviewed any evidence to support this commitment.		Observation
3		Working in close proximity to protected significant areas	Ensure that protected sensitive areas are adequately identifiable prior to commencing works.		Auditors have not reviewed any evidence for this commitment.		Observation
			Supervisors and Project engineers are to ensure all work within the sensitive areas are conducted within the relevant EWMS		Auditors have not reviewed any evidence for this commitment.		Observation
			During set-up, all vehicles to park in designated parking areas and not under the canopies of trees or within TPZ		Vehicles were parked in designated areas, away form TPZ and tree canopies at the time of the audit. However, the audit did not take place during set up and no evidence has been sighted that ensures the condition was followed.		Observation
			Ensure all controls listed on the SSESCP are installed prior to the commencement of construction		Auditors have not reviewed any evidence for this commitment.		Observation
4	HDD management	Install environmental controls	Erosion and sediment controls to be implemented as per the approved SSESCP which will include: o Access track stabilisation at entry and exit locations o Stockpile locations, downslope sediment controls and upslope water diversion o Location and dimensions of Type 2 controls at discharge locations		Auditors sighted a stabilised access track at the entry pad site. The stockpile located at the entry pad site was not on the downslope, therefore, did not require downslope sediment controls (however, the entire sight was surrounded by an earthern bund). Discharge locations were not present at the entry site.		Acceptable
			Install earthern bund around downslope of all HDD facilities (i.e. drill rig, entry and exit pits).		Auditors sighted earthern bund around the HDD facility.		Acceptable
			Install flow diversions around the upslope of all HDD facilities, including the HDD drill rig, drilling fluid storage areas and entry / exit pits.		Earthern berms we present at the upslope section of the HDD entry pad.		Acceptable
			Install entry/exit pits and earthern bunds as required to contain drill muds		The auditors visited the Deep Creek entry pad site. The site was surrounded by an earthern bund.		Acceptable
			Install TPZ's, No Go Zone flagging / fencing		No TPZs were present at this sight.		Not applicable
5		Install Surface Mud Return Line	The boundaries of the restricted work area across Deep Creek will be staked by a surveyor prior to installation of the surface mud return line		The auditors did not witness the installation of the surface mud return line or review any evidence to support the provisions outlined in column D.		Not applicable
			All No Go Zones will be installed with exclusion fencing and signage prior to installing the surface mud return line				Not applicable

			All SCA personnel and sub-contractors installing the surface mud return line are to undertake a specific SCA Toolbox Talk outlining the importance of compliance with the WORM CHMPs.				Not applicable
			The rolling out of the mud return line poly pipe will be undertaken at the entry or exit pad and not within the restricted work area.				Not applicable
			No plant will be used to install the surface mud return line through Deep Creek. On ground personnel will be used to install the mud return line through Deep Creek.				Not applicable
			Entry into Deep Creek and tributaries by on ground personnel will be minimised as much as reasonably practicable. On ground workers will pass the mud return poly pipe from one side of Deep Creek to the other.				Not applicable
			The surface mud return line will be secured by sandbags at either side of Deep Creek to reduce the movement of the mud return line in the watercourses as much as reasonably practicable.				Not applicable
			On ground personnel will access the banks of Deep Creek within the restricted work area at the point where the slope is the lowest available				Not applicable
			No works other than the install and removal of the surface mud return line will occur at the banks of Deep Creek.				Not applicable
			No clearing within the restricted work area to occur for installation of the mud return line				Not applicable
			If trimming of trees is required, a level 3 Arborist will conduct the tree trimming.				Not applicable
6		Conduct HDD	Undertake a desktop hydro fracture assessment based on geotechnical reports provided by APA to minimise the risk of hydro fracture during Deep Creek HDD.		Auditors have not reviewed any evidence for this commitment.		Observation
			Implement a volumetric drilling fluid tracking program with defined thresholds levels for fluid loss, stop works and further investigation.		Auditors have not reviewed any evidence for this commitment.		Observation
			Have hydrophobic spill kits available at the HDD site to contain spills on land		Spill kit was present on site.		Acceptable
			Have appropriate spill response equipment (e.g. silt curtain or boom) available at Deep Creek during HDD to contain drill fluids lost to water and prevent migration downstream		Absobent pads were sighted at Deep Creek HDD sights to treat minor oil leak		Acceptable
			Select drilling fluid that is inert and non-toxic		Auditors have not reviewed evidence for this commitment.		Observation
			Undertake daily inspections and constant monitoring during HDD activities to identify any loss of fluid	Daily inspections	Daily inspections do not contain specific checks relating to loss of fluid.		Minor non-conformance
			Monitor drilling mud sumps daily to minimise risk of overflow. Dispose of drilling mud fluid as required to prevent overflow of sumps / pits.		Daily inspection report dated 20/12/22 contains a check for the presence of sump pits, however, there are no checks that refer to monitoring of the sumps.		Observation
			Two complete sets of steering tools will be available onsite if possible		This commitment is outside of the scope of this audit.		Not applicable
			Use HDD survey tool to monitor the drill direction		This commitment is outside of the scope of this audit.		Not applicable
			HDD steering angles to be kept to a minimum		This commitment is outside of the scope of this audit.		Not applicable
			Avoid HDD doglegs		This commitment is outside of the scope of this audit.		Not applicable
			Follow EPA Publication 1827.2 (Waste classification assessment protocol), EPA Publication 1828.2 (Waste disposal categorises) and IWRG 702 to classify all waste and for its disposal		Auditors have not reviewed any evidence for this commitment.		Observation
			Follow the waste tracking protocol for all waste disposal		Auditors have not reviewed any evidence for this commitment.		Observation
			Ensure all waste is disposed of at a licensed waste facility suitable for the waste classification and volume.		Auditors have not reviewed any evidence for this commitment.		Observation
7		Removal of Surface Mud Return Line	Mud return line will be flushed with clean water prior to removal		The auditors did not witness the removal of the surface mud return line or review any evidence to support the provisions within column D.		Not applicable
			Entry and exit pit and surrounding bund will have 120% capacity of the mud return line to capture off drilling fluid when flushed				Not applicable
			The boundaries of the restricted work area across Deep Creek will be staked by a surveyor to delineate the restricted work area boundary				Not applicable
			All No Go Zones will be installed with exclusion fencing and signage prior to removal of the surface mud return line				Not applicable
			All SCA personnel and sub-contractors removing the surface mud return line are to undertake a specific SCA Toolbox Talk outlining the importance of compliance with the WORM CHMPs.				Not applicable
8		Disposing of Drill fluid	Dispose of all drilling fluid in accordance with Environmental Protection Regulation 2021 (Vic) and EPA Publication 1827 and 1968.		Auditors have not reviewed any evidence for this commitment.		Observation
9	Complaints Handling	Responding to complaints	Public complaints to be reported to the Community Relations Team as soon as possible		The complaints register does not contain any complaints from Deep Creek (last complaint dated 11/5/23)	Complaints register	Not applicable
			Works will be reviewed to avoid or minimise the issue and prompt feedback provided to any Complainant regarding the outcome of the issue.		The complaints register does not contain any complaints from Deep Creek (last complaint dated 11/5/23).	Complaints register	Not applicable
			All complaint handling are to be conducted in accordance with the Stakeholder Engagement Plan		The complaints register does not contain any complaints from Deep Creek (last complaint dated 11/5/23).	Complaints register	Not applicable

10	Incident Management	Incident occurs or there is a potential for an incident	If incident occurs, follow Environmental Incident Response Procedure in CEMP including: o Assess incident; stop works in the immediate area and contain incident if safe to do so. o Notify supervisor immediately. Supervisor to notify Environmental Manager immediately. o Implement additional containment measures. o Environmental Manager or Project Manager to notify APA or regulating authority (if required) and provide written notification of the incident occurring as soon as practicable.		The corrective actions register does not contain any incidents at Deep Creek, however, the incident register records the following reportable incidents: - Deep HDD spill on 23/03/23 - Deep frac out on 15/03/23 And one near miss 'drill fluid loss Deep Creek' on the 14/03/23. **OFI:** No reports have been sighted for the reportable incidents, therefore the auditors are unable to confirm if the Environmental Incident Response Procedure had occurred.		Opportunity for improvement
			Follow Environmental Incident Response Procedure and Spill Response Procedure. Should a spill occur: o Stop the source of the spill. o Contain the spill if possible using sand bags, pads, etc. o Notify SCA Environmental Team and Project Manager immediately. o Clean up as advised by the Environmental Manager and Safety Manager.		The corrective actions register does not contain any incidents at Deep Creek, however, the incident register records the following reportable incidents: - Deep HDD spill on 23/03/23 - Deep frac out on 15/03/23 And one near miss 'drill fluid loss Deep Creek' on the 14/03/23. **OFI:** No reports have been sighted for the reportable incidents, therefore the auditors are unable to confirm if the Environmental Incident Response Procedure and Spill Response Procedure had occurred.		Opportunity for improvement
			Follow Environmental Incident Response Procedure including: - Stop all HDD works in the vicinity and notify your supervisor. - Contain discharge where possible. - Notify your supervisor of the incident. Environmental Officer to contact the Environmental Manager for advice. - Clean up if safe. -Review controls and update SSESCP.		The corrective actions register does not contain any incidents at Deep Creek, however, the incident register records the following reportable incidents: - Deep HDD spill on 23/03/23 - Deep frac out on 15/03/23 And one near miss 'drill fluid loss Deep Creek' on the 14/03/23. **OFI:** No reports have been sighted for the reportable incidents, therefore the auditors are unable to confirm if the Environmental Incident Response Procedure had occurred.		Opportunity for improvement
			Weather will be tracked prior to and during these activities. The weather forecast will be discussed at prestart meetings and weekly team meetings		Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** auditors have not reviewed evidence that the weather forecast is discussed at prestart meetings and weekly team meetings		Observation
			In the event of any forecasted flood event, effective controls, will be implemented to ensure personnel are safe and there is no environmental harm (i.e. evacuate to elevated area and ensure any equipment, vehicles or items listed on the temporary works register are relocated to above the 1 in 20 year flood level)		Auditors have not reviewed evidence that flood protocol (outlined in column D) was followed when a flood event has been forecasted.		Observation
			The Flood Warning and Evacuation Plan and Trigger Action Response Procedure will be followed at all times		Auditors have not reviewed evidence that The Flood Warning and Evacuation Plan and Trigger Action Response Procedure was followed during a flood event.		Observation

32	Acceptable
2	Major non-conformance
1	Minor non-conformance
48	Observation
6	Opportunity for improvement
36	Not applicable
125	

WORM Commitments Register (Merri Creek SSEMP Rev1)

KP 42 – Merri Creek crossing

Document Section	Title	Extract	Commitment	Evidence of Compliance	Aventus comments/findings	Document reference	Compliant?
MERRI CREEK							
4		SCA will reduce construction impacts on Merri Creek as far as reasonably practicable by: Clearly marking out the Project boundary and installing exclusion fencing with signage along the edge of the RoW to prevent unauthorised access into Merri Creek. Exclusion fencing will be monitored daily and rectified immediately if found to be damaged or not in place.			Construction RoW was reduced to 25 m (compared to 30 m) in an effort to reduce impacts. Exclusion fencing along the RoW was in tact and no visible signs of RoW breaches.		Acceptable
4		Raising awareness of Conservation Area 34a and Merri Creek through the Project Induction and Environmental Toolbox Talks. All personnel conducting works on the Project will be inducted.		Project Induction and Environmental Toolbox Talks	The project induction lists Merri Creek as an environmental protected area. Induction register confirms all personnel have completed the induction. TBT has not been sighted.	Project Induction and Environmental Toolbox Talks attendance sheets and slides	Acceptable
4		Following the Merri Creek Construction Procedure (See below, section 8)			See below (section 8)		Acceptable
4		Managing topsoil in accordance with BPESC (IECA, 2008) which would involve: o Prevent mixing of topsoil and subsoils as far as reasonably practicable o Prevent the loss of the native seed bank within Merri Creek topsoil o Minimise erosion of topsoil. o Stockpile topsoil at a maximum height of 3m.			Trenching had not occurred at the time of the audit, therefore, stockpiles were not present. Daily environmental checklists dated 23rd and 24th of April for Merri Creek contain checks for stockpile separation and erosion and sediment control checks relating to stockpiles.	Visual inspection Daily environmental checklists dated 23rd and 24th of April	Acceptable
4		Implementing the Reinstatement and Rehabilitation Plan			Auditors did not witness reinstatement at this site, rehabilitation commitments will be the focus of future audits.		Not applicable
4		Control the dispersal and growth of weed species within Merri Creek during and post construction (see below, section 6).			See section 6 of this spreadsheet		Acceptable
ENVIRONMENTAL MANAGEMENT MEASURES							
5.1	Survey Set Out and Demarcation	Prior to mechanical construction activities occurring SCA will survey the boundaries of Conservation Area 34a per the Survey & Site Set Out Procedure.		Site survey	Auditors have not reviewed evidence for this commitment.	Site survey	Observation
		Temporary fencing will then be installed and maintained along Conservation Area 34a construction boundary. Temporary fencing will be temporary construction ATF fencing or star picket wire fencing with pickets driven up to 300mm deep at 5m intervals			Auditors sighted Temporary fencing installed along Conservation Area 34a, the fencing was in good condition during the time of the audit.		Acceptable
		Continuous flagging will be placed along the temporary fencing with 'No Go Zone' signage placed along the fencing at intervals not exceeding 30m.			Auditors sighted continuous flagging along the temporary fencing with no-go signage in place.		Acceptable
		SCA will survey and signpost the 1 in 100 year ARI at Merri Creek which will state that all stockpiles are to be stored above the 1 in 100 year ARI flood level. Refer to Merri Creek Erosion and Sediment Control Plan for image of 1 in 100 year ARI level (Appendix H).			Auditors did not sight signposts denoting the 1 in 100 year ARI at Merri Creek, however, based on Appendix H of this plan the auditors can verify the topsoil stockpiles were outside of the 1 in 100 year ARI level (i.e., within the RoW, away from the watercourse banks).		Minor non-conformance
		SCA will provide DELWP with the survey record of the temporary construction fencing along the boundary of the construction footprint and Conservation Area 34 prior to construction commencing within the Conservation Area.			Auditors have not reviewed evidence for this commitment.		Observation
5.2	Chemical Management	SCA will adhere to the following chemical management measures when working within Conservation Area 34a: No chemicals, fuels or hazardous materials will be stored within Conservation Area 34.			No chemicals, fuels or hazardous materials were stored within Conservation Area 34a.		Acceptable
		Refuelling points to be located 100m outside Merri Creek for plant and vehicles			No refuelling signage was present upon site entry (100 m away from Merri Creek).		Acceptable
5.3	Sodic and dispersive soils	To counteract the negative environmental impacts associated with disturbing sodic and dispersive soils, SCA will conduct spoil amelioration for trench backfill in accordance with the Sodic and Dispersive soils Management Plan (18035-PL-CN-0011) and ameliorate subgrade (subgrade is the soil horizon beneath topsoil) and topsoil in accordance with the soil amelioration rates identified in Property Management Plans (PMP for Property 1 LP38239 and Property 1 TP709759).			Auditors did not witness any backfilling or amelioration at this site.		Not applicable
5.3.2	Soil Monitoring	Soil monitoring will be undertaken visually during the Daily Environmental Inspection. Visual monitoring will identify areas of soil erosion and signs of sodic and dispersive soil (e.g. highly turbid runoff). Corrective actions will be used to manage any hazards or non-conformances identified in the Daily Environment Inspection per SCA's CEMP.		Daily Environmental Inspection.	Daily environmental inspections dated 23rd and 24th of April 2023 contain erosion and sediment checks. The corrective action register flags erosion and sediment controls need to be installed at Merri Creek South on 2/2/23, the action was closed on the 10/02/23. The corrective actions register notes that geofab will be installed once vegetation has been stripped.	Daily Environmental Inspections dated 23rd and 24th of April. Corrective actions register Incident register	Acceptable
		Soil amelioration will also be monitored through chemical soil analysis (soil amelioration analysis). Soil amelioration analysis will be undertaken in a linear progression along the construction RoW to verify the soil has been ameliorated with the correct quantity of required ameliorant. Soil ameliorant analysis will be conducted per the Sodic and Dispersive Soils Management Plan.			Auditors did not witness any amelioration at this site.		Not applicable

5.4	Geoheritage	SCA will confine construction and subsequent related activities to the easement and adjacent areas previously utilised and disturbed for pipeline installation including stockpile and laydown. Vehicle and machinery crossing of the channel pre and post excavation will be minimised as much as practicable.			Construction RoW was reduced to 25 m (compared to 30 m) in an effort to reduce impacts. Vehicle and machinery crossing is minimised due to compulsory washdowns upon entry to site.		Acceptable
5.4		If rock properties permit, mechanical excavation or sawing across the channel will be utilised rather than blasting. Resurface or rock beaching will be completed with existing rock material type (basalt). Where removal of basalt boulders is required, they will be moved as an intact body and replaced in the same orientation and geometry either in the initial position or as close as practicable to that position.			Auditors sighted rocks that were moved from the site intact, clearly labelled and flagged to be used for reinstatement.		Acceptable
5.4		Construction of the Merri Creek crossing will occur during minimal or no channel flow. All introduced obstructions to flow after the pipe has been laid and backfilled will be removed. The existing channel and bank dimensions—width, gradient and depth, will be re-established after construction. Excess introduced construction materials will be removed once construction is completed.			This commitment is relevant to post-construction.		Not applicable
5.4		A site-specific erosion and sediment control plan will be implemented (Section 10.0). See below.			See below (section 10.0)		Acceptable
SEDIMENT AND EROSION CONTROL							
10		**ACCESS TRACKS** All access tracks will be within the Project's Activity Area. Spiecapag will construct access tracks in accordance with IECA BPESC (2008).			All access tracks were sighed within the RoW during the audit.		Acceptable
10		If Merri Creek doesn't have any surface water flow during construction, SCA will construct a 'bed level crossing' access track.			Minimal surface flow was present at the time of construction, therefore 'bed level crossing' access track was not constructed.		Not applicable
10		If Merri Creek has surface flow during construction, SCA will install a flume pipe access track.			Flume pipe and access track was installed and sighted during the audit.		Acceptable
10		**SPOIL STOCKPILE LOCATIONS and indicative Erosion and Sediment Control (ESC) around stockpiles** Stockpile locations will be within the Project's Activity Area and outside the 1 in 100 year ARI flood level and have appropriate erosion and sediment controls installed on the down slope of stockpiles			Auditors sighted stockpiles of topsoil within the RoW (outside of the 1 in 100 year ARI flood level) with adequate sediment fencing in place.		Acceptable
10		Stockpiles within Conservation Area 34 left for over 28 days will be stabilised with soil binder or rye grass.			Auditors did not sight an soil binder or rye grass at stockpiles.		Not applicable
10		Topsoil stockpiles will be managed as per IECA BPESC (2008)			Auditors sighted stockpiles of topsoil within the RoW with adequate sediment fencing in place, the stockpiles did not exceed 3m in height and no mixing of topsoil with subsoil was evident.		Acceptable
10		**APPROXIMATE MACHINERY/PLANT LOCATIONS** Plant and machinery will be parked up when not in use a minimum of 20m away from the banks of watercourses and drainage lines.			Auditors did not witness any parked plant or machinery not in use, however, the auditors did experience parking the car (over 20 m away from the watercorse/drainage lines) and proceeded to enter the site on foot.		Acceptable
10		Spill equipment will be stored at plant and equipment laydowns.			Spill kit was present at the plant and equipment laydown (at the washdown).		Acceptable
10		Establishment of no-go zones / tree protection zones and exclusion zones around native vegetation and habitat			TPZ was present with bunting and signage. Fencing with flagging along the RoW was in place denoting 'no-go' beyond the RoW. **OFI**: the auditors did not sight frequent 'do not enter' signage along the flagged fence.		Opportunity for improvement
10		Sodic Soil and Ground Movement Management Measures SCA will use gypsum and pH adjusters (e.g. lime) to ameliorate topsoils and subgrade per Property Management Plans. In general, the following ameliorants will be applied to the soils stripped and excavated from watercourse and drainage lines: Gypsum applied at 2kg/ha to subgrade [illegible]			Auditors did not witness any amelioration at this site.		Not applicable
10		Sodic and dispersive soils identified in the Sodic and Dispersive Soils Management Plan will be ameliorated with gypsum to reduce the Exchangeable Sodium Percentage (ESP) to approximately 4% or less and / or cap dispersive soils with a 300mm layer of non-dispersive soil.			Auditors did not witness any amelioration at this site.		Not applicable
BIOSECURITY AND WEED MANAGEMENT							
6.1	Weed Management	All plant and vehicles entering Conservation Area 34a will require a weed and seed inspection to be undertaken by SCA Environment Team or delegate and be free of potential weed and seed carrying material (e.g. mud).		SCA will issue a WORM Weed Hygiene Record to all plant and vehicles after the weed and seed inspection. The WORM Weed Hygiene Record will be carried within plant and vehicles at all times.	The auditors did not get the opportunity to check the weed and seed paperwork for the one vehicle they used entering Merri Creek, however, the auditors did sigh the biosecurity register at the washdown area. Daily environmental inspections dated 23rd and 24th of April 2023 contain checks for the currency of the biosecurity register and checks for weed inspections taking place.	WORM Weed Hygiene Record Daily environmental inspections dated 23rd and 24th of April 2023	Acceptable
6.1		Weed and seed inspections will be conducted at onsite washdown bays located outside Conservation Area 34a. If weeds or weed carrying material is identified during the weed and seed inspection, the operator will conduct a weed and seed washdown (or blow down in dry weather conditions) to remove all weeds and weed carrying material. All vehicle washdown bays will have suitable drainage and bunding to contain and collect all washdown material for legal disposal.			Biosecurity washdown area is set up with suitable drainage and bunding upon entering Merri Creek.		Acceptable
6.1		Any weed species identified growing in topsoil stockpiles within Merri Creek or Conservation Area 34a or at Conservation Area 34a washdown bays will be removed, by hand if possible, and legally disposed of. Any weeds identified in Conservation Areas will be added to the Environmental Line List to prompt maintenance during reinstatement and rehabilitation.			No weed species were identified growing in topsoil stockpiles within Merri Creek or Conservation Area 34a or at Conservation Area 34a washdown bays during the audit		Not applicable

6.2	Biosecurity	Pathogen awareness and training will also be delivered to the Project construction team though the WORM Project Induction and Environmental Toolbox Talks (Appendix F) to ensure all Project personnel are aware of their biosecurity responsibilities and reduce the risk of spreading biosecurity threats as far as reasonably possible.		Pathogen awareness and training via WORM Project Induction and Environmental Toolbox Talks	Appendix F of the SSEMP contains the material for pathogen awareness and training. Records to be provided.	Appendix F	Acceptable
6.2.1	Phytophthora	Inspections for signs of phytophthora dieback will be undertaken during the Daily Environment Inspection. If dieback is identified: - Clean downs will be conducted for all plant, vehicles and personnel working within the area to remove soil from tools, plant and equipment, clothing and boots. Clean downs will be done with a blower and brush to remove soil and plant material (dust and grime have a low risk of spreading phytophthora). All material removed from plant, vehicles and equipment will be collected and legally disposed of. - Washdowns using water will be avoided where possible in and around areas of dieback. If wet washdowns are required, soil and mud will be removed manually before water is used. o All material removed from washdowns will be collected and legally disposed of. No runoff from washdowns will be allowed to leave the construction footprint, this requirement is especially important around areas of bushland where phytophthora dieback will be the most devasting for the surrounding ecosystem. o Driving will be minimised through washdown areas where practicable.		Daily Environment Inspections	Daily environmental inspections dated 23rd and 24th of April 2023 contain checks for phytophthora dieback. The corrective actions register and incident register do not contain any reports of phytophthora dieback. Auditors did not identify any evidence phytophthora dieback during the audit.	Daily Environment Inspections	Acceptable
		Disinfectant will be applied to plant, vehicles and tools after clean downs and washdowns. Disinfectant will be made from either: o Methylated spirits – 70% spirits to 30% water o Sodium hypochlorite (pool chlorine) – 6ml sodium hypochlorite to 10L of water o Household bleach – 1 part bleach to 4 parts water o Commercial products such as phytoclean – mix per label directions			Disinfectant was present at the washdown sight and was used by the auditors and team to washdown shoes before entering Merri Creek.		Acceptable
6.2.2	Chytrid Fungus	To minimise the likelihood of introducing and/or spreading Chytrid Fungus during construction the following measures will be required: **Handling:** o Only Environmental Officers with Wildlife Authorisation will handle frogs. o Disinfect equipment prior to use o Only store one amphibian per bag and disinfect bag after use o Use one pair of disposable gloves per amphibian if capturing is required o Disinfect boots and PPE after handling amphibians			No amphibians were detected during the audit.		Not applicable
6.2.2		**Construction vehicles, equipment and machinery:** Temporary washdown bays will be established on either side of Conservation Area 34a.			Biosecurity washdown area is set up with suitable drainage and bunding upon entering Merri Creek.		Acceptable
6.2.2		Clean downs will be conducted for all plant, vehicles and personnel working within the area to remove soil from tools, plant and equipment, clothing and boots. Clean downs will be done with a blower and brush to remove soil and plant material. All material removed from plant, vehicles and equipment will be collected and legally disposed of.			Biosecurity washdown area is set up with suitable drainage and bunding upon entering Merri Creek.		Acceptable
6.2.2		Disinfectant will be applied to plant, vehicles and tools after clean downs and washdowns.			Disinfectant was present at the washdown sight and was used by the auditors and team to washdown shoes before entering Merri Creek. The auditors also witnessed a vehicle washdown.		Acceptable
FLORA AND FAUNA MANAGEMENT							
7		All flora and fauna management within Conservation Area 34a will be conducted in accordance with the Tree Management Plan, Fauna Management Plan and SCA's CEMP.			TPZ was present at Merri Creek (as per TMP). Pre-clearance inspections were undertaken on the 25th, 26th and 27th of January 2023 at Merri Creek after dusk to check for growling grass frogs. None of the site inspections detected the species (as per FMP). Fauna checks are within the daily inspections. **Observation:** no other flora/fauna records/documentation has been reviewed by the auditors.		Acceptable
7		Construction works, vehicle traffic and placement or storage of structures or materials are not permitted beyond the approved construction area within Conservation Area 34a to prevent harm occurring to flora and fauna outside the construction footprint.			Auditors did not witness any Construction works, vehicle traffic, placement or storage of structures or materials outside of the approved construction area. The corrective actions register and incident register do not contain any reports of activity occurring outside of the construction area.	Visual inspection.	Acceptable
7		Trees with significant conservation values adjacent to the construction footprint will have modified TPZ's erected. The Tree Management Plan describes these significant trees and their required management measures, to be installed prior to construction.			TPZ was present with bunting and signage.		Acceptable
7		Pre-clearance inspections will be undertaken by a qualified Fauna Spotter Catcher with Wildlife Management Authorisation under the Wildlife Act 1975 (Vic) prior to clearing through Merri Creek. The Fauna Spotter catching will identify and record any potential fauna habitat and salvage any fauna from these sites prior to clear and grade. The Fauna Spotter Catcher will also be present during clearing to manage any opportunistic fauna encounters.			Pre-clearance inspections were undertaken on the 25th, 26th and 27th of January 2023 at Merri Creek after dusk to check for growling grass frogs. None of the site inspections detected the species.	Pre-clearance inspections	Acceptable
7		Aquatic fauna salvage will be undertaken by a Fauna Spotter Catcher with Wildlife Management Authorisation prior to dewatering the Merri Creek construction footprint (if required).			The following documents have been sighted for the fauna spotter catcher (Richard Swindells): - wildlife control licence (licence no. 14918164CX) exp: 30/06/23 - ACM30117 Certificate III in Animal Studies - letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue **Observation:** Auditors have not reviewed any evdience of aqautic fauna salvage (if it has occured).		Observation

MERRI CREEK CONSTRUCTION PROCEDURE							
8		Merri Creek will be constructed using the 'open cut' trench methodology. SCA will ha ve flume pipes and water pumps available during construction within Merri Creek to divert water around the construction footprint / open trench to respond to incoming rain events which are likely to cause surface flows.			Auditors witnessed the 'open cut' trench methodology occuring at Merri Creek. Auditors sighted the flume pipe beneath the access track, however, water pumps were not in place at the time of the audit.		Acceptable
8		Time is of the essence during the crossing of Merri Creek and construction within Merri Creek should be limited to the shortest practicable time.			At the time of the audit no major delays for construction at Merri Creek were evident. The monthly report for January does not discuss any delays specific to Merri Creek.	Monthly Report 005 – 1st to 31st January 2023 (18035-SCA-WORM MPR-005)	Acceptable
8		Due to the expected rainfall and climatic conditions likely to occurring during construction through Merri Creek, the 'Wet Work Methodology' will be used during construction.			Auditors witnessed the 'Wet Work Methodology' being implemented during the audit.		Acceptable
8		The 'Dry Works Methodology' will only be used if weather conditions change, no surface flow is present in Merri Creek and rainfall during construction is not likely to occur. If 'Dry Works Methodology' is to be used, SCA will notify DWELP prior to the set out for the works within Merri Creek.			Surface flow was present at the time of the audit, therefore the 'Dry Works Methodology' was not activated.		Not applicable
8.1	Wet Work Area	If surface flow is present or is predicted to occur during construction, the following work steps will be implemented: Obtain permission to access private property prior to the commencement of works if required.			Auditors have not reviewed evidence for this commitment.		Observation
8.1		Install pump into watercourse to start water bypass around construction area and create a dry working area.			Auditors did not witness pump installation or water bypass during the audit.		Not applicable
8.1		Install bunds upstream and downstream of the trench and access track within the construction footprint.			Auditors did not sight bunds upstream or dowstream of the trench access track, as the audit was not during this phase of work.		Not applicable
8.1		Install pumps into construction work area to dewater any remining pools. Dewatering will occur per WORM Overarching Erosion and Sediment Control Plan and Trench Dewatering Plan which requires the dewatering release point to be over 10 0m away from watercourses.			Auditors did not witness any installation of pumps or dewatering during the audit.		Not applicable
8.1		Install stable access track with flume pipes to facilitate construction access across Merri Creek.			The auditors sighted the stable access track with one flume pipe installed.		Acceptable
8.1		Monitoring the weather forecast to ensure adequate flow diversion equipment is onsite to manage the predicted rainfall forecast and implement TARPs as required.			Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** Auditors have not reviewed evidence that adequate flow diversion equipment was deployed when rainfall was predicted.		Observation
8.1		Strip topsoil and stockpile separately from trench spoil. Topsoil stockpiles outside the 1 in 100 year ARI flood level.			At the time of the audit, only topsoil was stockpiled and placed on the side of RoW (outside the 1 in 100 year ARI flood level). Daily reports from the 24th and 25th of April 2023 contain checks for topsoil, subsoil and rocks being stockipiled seperately and their presence in the RoW (outside the 1 in 100 year ARI flood level).	Daily Environmental Inspections dated 23rd and 24th of April 2023.	Acceptable
8.1		Construct a stable access track through Merri Creek.			Access track was stable at the time of the audit.		Acceptable
8.1		Excavate soil to form a linear trench.			Excavating was not taking place at the time of the audit.		Not applicable
8.1		Stockpile trench spoil separately from topsoil and outside the 1 in 100 year ARI flood level.			At the time of the audit, only topsoil was stockpiled and placed on the side of RoW (outside the 1 in 100 year ARI flood level). Daily reports from the 24th and 25th of April 2023 contain checks for topsoil, subsoil and rocks being stockipiled seperately and their presence in the RoW (outside the 1 in 100 year ARI flood level).	Daily Environmental Inspections dated 23rd and 24th of April 2023.	Acceptable
8.1		Ameliorate trench spoil per Sodic and Dispersive Soils Management Plan requirements.			Auditors did not witness any amelioration at this site.		Not applicable
8.1		Lift and lay welded pipe string into the excavated trench in accordance with the approved lift plan.			Auditors did not witness pipe laying at this site.		Not applicable
8.1		Install trench breakers as required by APA specifications.			Trenching had not occurred at the time of the audit. Therefore, trench breakers were not present.		Not applicable
8.1		Backfill the trench, compact the trench, return the contours of Merri Creek to their original condition as far as reasonably practicable.			Backfilling, compacting and returning of the contours had not occurred at the time of the audit.		Not applicable
8.1		Rehabilitate and stabilise Merri Creek as soon as construction is complete within the construction footprint (with the exception of the Merri Creek access track).			This commitment is relevant to rehabilitation which will be the focus of a future audit.		Not applicable
8.1		Maintain a stable access track through Merri Creek with appropriate erosion and sediment controls and adequate flow diversions.			Auditors sighted the following erosion and sediment controls in place: sediment fencing ajacent to topsoil stockiples, and coir logs and geofabric at the Merri Creek bank. **OFI:** Coir logs on west side of creek used to catch sediment off the top-of-bank berm were not formed in a U-shape to retain sediment. (needs to be re-fashioned) **OFI:** Geofabric material installed on east side of the creek bank were only held in place with rocks – not pegged in properly (in the event of heavy rains, this may not hold up).		Opportunity for improvement
8.1		Rehab and stabilise work area with exception of the access track. Rehab standards will reflect the site conditions at the time of rehabilitation.			This commitment is relevant to rehabilitation which will be the focus of a future audit.		Not applicable
8.1		Remove pumps and allow water to flow.			This commitment is relevant to post-construction.		Not applicable
8.1		Once access is no longer required across Merri Creek, SCA will remove and rehabilitate the access track area by:			This commitment is relevant to rehabilitation which will be the focus of a future audit.		Not applicable

8.1		Installing upstream and downstream erosion and sediment controls depending on level of water present in Merri Creek (determined by CPESC Erosion and Sediment Control Plan to be developed prior to works).			Auditors sighted the following erosion and sediment controls in place: sediment fencing ajacent to topsoil stockiples, coir logs and geofabric Merri Creek bank. **OFI:** Coir logs on west side of creek used to catch sediment off the top-of-bank berm were not formed in a U-shape to retain sediment. (needs to be re-fashioned) **OFI:** Geofabric material installed on east side of the creek bank were only held in place with rocks – not pegged in properly (in the event of heavy rains, this may not hold up).		Opportunity for improvement
8.1		Remove access track material and any flume pipes.			This commitment is relevant to post-construction.		Not applicable
8.1		Regrade the contours of Merri Creek to pre-construction conditions as much as reasonably practicable.			This commitment is relevant to post-construction.		Not applicable
8.1		Rehabilitation and stabilise the area.			This commitment is relevant to rehabilitation which will be the focus of a future audit.		Not applicable
8.1		Remove erosion and sediment controls and pumps.			This commitment is relevant to post-construction.		Not applicable
8.2	Dry Works Methodology	If Merri Creek is dry the following open cut work methodology will be used:			Merri Creek contained surface flow at the time of construction/ the audit. Therefore, the dry works methodology was not adopted.		Not applicable
8.2		Monitoring the weather forecast to ensure adequate flow diversion equipment is onsite to manage the predicted rainfall forecast and implement TARPs as required.					Not applicable
8.2		Stripping topsoil and stockpiling separately from trench spoil. Topsoil stockpiles will outside the 1 in 100 year ARI flood level.					Not applicable
8.2		Construct a stable access track through Merri Creek.					Not applicable
8.2		Excavate soil to form a linear trench.					Not applicable
8.2		Stockpile trench spoil separately from topsoil and outside the 1 in 100 year ARI flood level.					Not applicable
8.2		Ameliorate trench spoil per Sodic and Dispersive Soils Management Plan requirements.					Not applicable
8.2		Lift and lay welded pipe string into the excavated trench in accordance with the approved lift plan.					Not applicable
8.2		Install trench breakers as required by APA specifications.					Not applicable
8.2		Backfill the trench, compact the trench, return the contours of Merri Creek to their original condition as far as reasonably practicable.					Not applicable
8.2		Rehabilitate and stabilise Merri Creek as soon as construction is complete within the construction footprint (with the exception of the Merri Creek access track).					Not applicable
8.2		Maintain a stable access track through Merri Creek with appropriate erosion and sediment controls and adequate flow diversions.					Not applicable
8.2		Once construction access is no longer required through Merri Creek:					Not applicable
8.2		Install erosion and sediment controls downstream of the Merri Creek access track.					Not applicable
8.2		Remove access track materials and flume pipes if required.					Not applicable
8.2		Return the contours of Merri Creek to their original condition as far as reasonably practicable.					Not applicable
8.2		Rehabilitate and stabilise Merri Creek.					Not applicable
8.2		SCA will aim to minimise the duration of open trench across Merri Creek by installing the pipe and backfilling in the shortest practicable timeframe.					Not applicable
WEATHER FORECAST AND TIMING OF WORKS							
9		The weather forecast will be continually monitored prior to and during works at Merri Creek to inform site management measures, including the implementation of the Site Specific Erosion and Sediment Control Plan (SSESCP) and the TARPs.			Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** Auditors have not reviewed evidence that the forecast has activated site management measures i.e.,implementation of the SSESCP and the TARP.		Acceptable
EVACUATION PROCEDURE FOR PEOPLE AND PLANT							
11		During works within the watercourse / drainage lines the weather will be monitored with a focus on incoming rainfall with the potential to cause surface flow and flooding. In the event of flash flooding events:			Weather is tracked daily within the environmental aspects register (Melbourne Airport). Rainfall is recorded in the environmental aspects register.	Environmental aspects register	Acceptable
11		Stabilise work area, remove hazardous chemicals and any portable toilets etc			No records of flash flooding at Merri Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). Therefore, the procedure outlined in column C has not been activated.	The corrective actions register & incident register	Not applicable
11		Move equipment/plant to a higher area clear of watercourse / drainage line if safe to do so.					Not applicable
11		Maintain contact with the Site Office, cease work and proceed as directed.					Not applicable
11		If site / access roads are covered by flood water, don't panic. Don't attempt to drive through deep / flowing water. If roads are cut off, notify Site Office by radio or phone and remain where you are.					Not applicable
11		In the event of the isolation of crews away from their accommodation, emergency evacuation to alternative accommodation may be required.					Not applicable
11		Project Manager will coordinate evacuation of all personnel to a safe area if required.					Not applicable
11		Project Manager shall continue to monitor information from local weather authorities and respond as directed (this could also be through liaison with the State Emergency Service, Police, etc).					Not applicable
11		Determine and request further resources as may be required.					Not applicable
11		Follow Spiecapag's Emergency Response Plan (18035-PL-ER-0002) for all Emergencies.					Not applicable
11.1	Flood Warning and Evacuation Management Procedure	Objectives: Manage flood risk during construction flood risk during construction including end of day requirements to limit flood risk exposure overnight	Develop and implement SSESCP in accordance with the IECA BPESC (2008) Guidelines.		It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the Worm Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation

11.1		Limiting footprint of disturbance of works within waterways and floodplains to limit flood risk exposure at any point in time to the extent reasonably practicable Placement of construction equipment and stockpile materials above threshold flood levels. Flood warning communication protocols and emergency response procedures. Management measures are outlined in column D	Continually monitor the weather forecast. If rainfall is predicted overnight, remove all equipment and plant from within the watercourse and store outside watercourse/drainage line bank.		Weather is tracked daily within the environmental aspects register (Melbourne Airport). Rainfall is recorded in the environmental aspects register. **Observation:** auditors have not reviewed evidence of the removal of all equipment and plant from within the watercourse and storage outside watercourse/drainage line bank when rain was anticipated.		Observation
11.1			Minimise the area of exposed soils with progressive reinstatement.		Auditors did not witness any reinstatement at the time of the audit.		Not applicable
11.1			Implement monitoring program and maintenance measures as required		The environmental aspects register has been sighted and contains water testing records at Merri Creek with location, date, pH, dissolved oxygen, salinity, total dissolved solids and temperature. This indicates that the monitoring requirements were implemented. Daily inspection reports demonstrates the site is monitored daily and any flagged items are recorded.		Acceptable
11.1			Only clear and disturb areas within the construction footprint and limit disturbance wherever possible to reduce erosion and sedimentation.		Auditors did not sight an evidence of disturbance outside the construction footprint. No records of any disturbance outside the RoW at Merri Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	The corrective actions register & incident register	Acceptable
11.1			Do not store stockpiles of vegetation, topsoil or trench spoil within the watercourse or drainage line		Auditors sighted topsoil stockiples along the RoW outside of the watercourse/drainage line. Daily reports from the 24th and 25th of April 2023 contain checks for topsoil, subsoil and rocks being stockpiled in the RoW (outside of the watercourse/drainage line).		Acceptable
11.1			All stockpiles are to be away from drainage lines or surface flow paths adjacent to watercourses		Auditors sighted topsoil stockiples along the RoW outside of the watercourse. Daily reports from the 24th and 25th of April 2023 contain checks for topsoil, subsoil and rocks being stockpiled in the RoW (outside of the watercourse).		Acceptable
REINSTATEMENT AND REHABILITATION PLAN		**Note: 13.1-13.9 relate to rehabilitation commitments (not relevant to the construction audit)**					
13.10	Existing Rocks	Any large surface rocks will be retained and where possible will be replaced back into the site. Returned rocks should be placed so that any oxidised surfaces remain exposed.			Auditors sighted large surface rocks for retention at Merri Creek, with sufficient signage and flagging.		Acceptable
13.11	Site Rubbish	SCA will remove all rubbish, including dumped and wind-blown rubbish from the rehabilitated area during reinstatement and the defect liability period.			This commitment relates to reinstatement which was not witnessed by the auditors during the audit.		Not applicable
14.0	MONITORING	Monitoring will be undertaken through Daily Environment Inspections during construction. SCA will implement non-conformances, incidents and corrective action management within Conservation Area 34a per SCA's CEMP requirements.			Example daily inspection reports have been sighted.		Acceptable
APPENDIX A: EWMS							
Appendix A	Prior to Works Commencing	Provide training to personnel and subcontractors involved	All construction personnel to complete the Project Induction		The induction register verifies all personnel have been inducted.		Acceptable
Appendix A			Toolbox Project Engineers and Supervisors on: o the requirements of this EWMS relevant to the work activity. o all procedures/registers/checklists/forms relevant to the work activity. o on SSESCP relevant to the work activity and work location. o on the locations of sensitive receivers relevant to the work activity and work location. o on the Flood Warning and Evacuation Management Procedure		Auditors have not reviewed evidence for this commitment.		Observation
Appendix A			Personnel involved in dewatering will be trained and comply with the Project CEMP requirements for dewatering to land including: o Water quality monitoring requirements o Aquatic Salvage o Dewatering locations o Erosion and sediment controls for dewatering o Monitoring of dewatering activities o Refuelling and storage of hydrocarbons during dewatering		Auditors have not reviewed evidence for this commitment.		Observation
Appendix A			Ensure construction personnel are inducted and receive ongoing training on: o Water quality management o Incident reporting o Identification of ASS / PASS and personal obligations to report excavated ASS or PASS o Soil conservation issues and erosion and sediment control systems including installation and maintenance and SSECP controls o Spill response procedures.		The induction register verifies all personnel have been inducted. **Observation:** auditors have not reviewed evidence that ongoing training has occurred for the provisions outlined in column D.		Observation
Appendix A			Ensure Project engineers and site personnel responsible for construction and maintenance of temporary erosion controls undergo specific Erosion and Sediment Control training.		Auditors have not reviewed evidence for this commitment.		Observation

Appendix A			Maintain records of all environmental training provided.		The following environmental training records have been sighted: Copy of certificate (SHLA01326) in reptile and venomous snake handling (22500VIC) attained on the 07/09/22 by the Spiecapag Environment Advisor has been sighted. The following documents have been sighted for the fauna spotter catcher (Richard Swindells): - wildlife control licence (licence no. 14918164CX) exp: 30/06/23 - ACM30117 Certificate III in Animal Studies - letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue **Observation:** Auditors have not reviewed any other evidene relating to environmental training.		Acceptable
Appendix A		Planning of Works	SCA Environment Team to be involved in planning and consulted prior to commencement of any required dewatering activities.		Auditors have not reviewed evidence for this commitment.		Observation
Appendix A			Any dewatering activities that may result in the stranding of aquatic species must be salvaged prior to dewatering. Salvage to be undertaken by persons with permits and approvals to undertake the works.		Auditors have not reviewed evidence for this commitment.		Observation
Appendix A			All pumps within Merri Creek must have a 5mm gauze or similar on the pump intake to minimise fauna being sucked into the pump.		Auditors did not sight any pumps at Merri Creek at the time of the audit.		Not applicable
Appendix A			Any tree clearing required will occur per the Fauna Management Plan and a Fauna Spotter Catcher with Wildlife Management Authorisation will be onsite during clearing to conduct pre-clearance inspections of any habitat and manage any identified fauna.		WORM - Pre-clearance Fauna Survey Report at KP 42 (Merri Creek) dated 06/02/23 has been sighted. The survey was undertaken by Richard Swindells (Fauna Handler), the report notes that no fauna were present. Three small hollows were identified as potential habitat and were searched before removal with a torch and camera. The hollows, trunk and large limbs were retained for site rehab.		Acceptable
Appendix A			Confirm that a SSESCP has been developed and signed off by the Environmental Manager.		It is unclear if the SSESCP is part of this plan (i.e, section 10) or if it is supposed to be a sub plan under the Worm Primary Erosion and Sediment Control Plan (18035-PL-HSE-0017) (the primary plan does not have sub plans attached).		Observation
Appendix A			Identify nearest sensitive receivers prior to works and plan works accordingly.		In addition to this plan, the APA CEMP (Rev 10) (18035-PL-HSE-0004) contains a detailed list of sensitive recievers within the ELL (appendix E) at Merri Creek and discusses specific controls for Merri Creek (Appendix F). The CEMP needed to be approved by DEECA before any work commenced.		Acceptable
Appendix A			No dewatering activities to affect landholder property without prior approval		Auditors have not reviewed any evidence for this commitment.		Observation
Appendix A			Obtain permission to access private property prior to the commencement of works if required.		Auditors have not reviewed any evidence for this commitment.		Observation
Appendix A			Sensitive areas within 50m of designated works to be clearly delineated and sign posted.		TPZ was present with bunting and signage. Fencing with flagging along the RoW was in place denoting 'no-go' beyond the RoW. **OFI**: the auditors did not sight frequent 'do not enter' signage along the flagged fence.		Opportunity for improvement
Appendix A			Fluorescent Orange flagging (or similar) on star pickets will be utilised to delineate sensitive areas. No-go signage to be installed at 50m intervals along the flagging.		Fencing with flagging along the RoW was in place denoting 'no-go' beyond the RoW. However, the auditors did not sight frequent 'do not enter' signage along the flagged fence.		Opportunity for improvement
Appendix A			Sensitive area fencing to be inspected and tool-boxed by the Environmental Officer prior to any commencement of works in the area.		Auditors have not reviewed any evidence for this commitment.		Observation
Appendix A			During construction boundary fencing is to be maintained as required.		The construction boundary fencing was well maintained at the time of the audit.		Acceptable
Appendix A			No works to be conducted outside the contractor clearing limits.		The auditors did not witness any works occuring outside the RoW (i.e., outside the contractor clearing limits).No records of any works occuring outside the RoW at Merri Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	The corrective actions register & incident register	Acceptable
Appendix A			No access is permitted outside the Approved Project Boundary.		The auditors did not witness any access beyond the approved project boundary. No records of access occuring outside the RoW at Merri Creek has been recorded in the the corrective actions register or incident register (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	The corrective actions register & incident register	Acceptable

Appendix A			Consider weather conditions on day prior to commencing work and prepare the work area for upcoming major rain event (audit controls, status of work area etc). If the forecast for rain is a 80% chance of rainfall equal to or greater than 20mm (24-hour period), the Environment Team is to review environmental controls with the Site Supervisor and undertake any actions required as per SSESCP		Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** auditors have not reviewed evidence for this commitment, i.e; records of the Environment Team reviewing environmental controls with the Site Supervisor and undertaking any actions required as per SSESCP when the forecast for rain is a 80% chance of rainfall equal to or greater than 20mm (24-hour period).		Observation
Appendix A			Follow all TARPS for Merri Creek		Auditors have not reviewed any evidence for this commitment.		Observation
Appendix A			Dewatering equipment and system are to be inspected prior to each use and regularly monitored throughout dewatering activities to working condition		Auditors did not witness any dewatering at the time of the audit and have not reviewed any evidence to support this commitment.		Observation
Appendix A			Foot valves are to be checked and used during dewatering to reduce sediment mobilisation		Auditors did not witness any dewatering at the time of the audit and have not reviewed any evidence to support this commitment.		Observation
Appendix A			SCA will have multiple pumps on site during the construction of Merri Creek which have been sized adequately by the Construction Supervisor / Engineer to manage the diversion of surface flow around Merri Creek which could be reasonably expected to occur during construction (using the weather forecast to predict surface flow).		Auditors did not witness any diversion of surface flow and have not reviewed any evidence to support this commitment. Weather is tracked daily within the environmental aspects register (Melbourne Airport).		Observation
Appendix A			SCA will limit the amount of time flow diversions are required at Merri Creek by: o Having the pipe strung and welded prior to opening the trench through Merri Creek. o Having the ability to lower in the welded pipe as soon as possible after trenching through Merri Creek. o Backfill Merri Creek trench immediately after lowering in of the welded pipe. o Rehabilitating Merri Creek immediately after backfill.		Auditors did not sight the construction stages outlined in column D at Meeri Creek during the audit and have not reviewed any evidence to support this commitment. Rehabilitation will be the focus of a future audit.		Observation
Appendix A			Merri Creek access track will have, at a minimum one 650mm diameter black max pipe diverting flow beneath the access track (the Construction Supervisor and Environment Manager will determine, based on the long term weather forecast, the need for additional black max pipes beneath Merri Creek access track prior to construction).		Auditors sighted the a singular pipe under the access track diverting water flow during the audit. The pipe had a diamater greater than 650mm.		Acceptable
Appendix A		Working in close proximity to protected significant areas	Ensure that protected sensitive areas are adequately identifiable and demarcated prior to commencing works.		Auditors have not sighted any evidence to support this commitment.		Observation
Appendix A			Supervisors and Project engineers are to ensure all work within the sensitive areas are conducted within the relevant EWMS		Auditors have not sighted any evidence to support this commitment.		Observation
Appendix A			During set-up, all vehicles to park in designated parking areas and not under the canopies of trees or within TPZ		Auditors have not sighted any evidence to support this commitment.		Observation
Appendix A			Ensure all controls listed on the SSESCP are installed prior to the commencement of construction.		Auditors have not sighted any evidence to support this commitment.		Observation
Appendix A	Open Cut Works Management	Install environmental controls	Erosion and sediment controls to be implemented as per the approved SSESCP which will include: o Access track stabilisation o Stockpile locations, downslope sediment controls and upslope water diversion o Location and dimensions of Type 2 controls at discharge locations		Auditors did not sight location and dimensions of Type 2 controls at discharge locations Auditors sighted the stabalised access track during the audit. Auditors sighted sediment fencing ajacent to topsoil stockiples along the RoW during the audit. The following sediment controls were also in place: **OFI:** Coir logs on west side of creek used to catch sediment off the top-of-bank berm were not formed in a U-shape to retain sediment. (needs to be re-fashioned) **OFI:** Geofabric material installed on east side of the creek bank were only held in place with rocks – not pegged in properly (in the event of heavy rains, this may not hold up).		Opportunity for improvement
Appendix A	Complaints Handling	Responding to complaints	Public complaints to be reported to the Community Relations Team as soon as possible		The complains register has been sighted and no complaints at Merri Creek have been recorded (last complaint dated 11/05/23).	Complaints register	Not applicable
			Works will be reviewed to avoid or minimise the issue and prompt feedback provided to any Complainant regarding the outcome of the issue		The complains register has been sighted and no complaints at Merri Creek have been recorded (last complaint dated 11/5/23).	Complaints register	Not applicable
			All complaint handling are to be conducted in accordance with the Stakeholder Engagement Plan		The complains register has been sighted and no complaints at Merri Creek have been recorded (last complaint dated 11/5/23).	Complaints register	Not applicable

Appendix A	Incident Management	Potential of actual environmental harm	If incident occurs, follow Environmental Incident Response Procedure in CEMP including: o Assess incident; stop works in the immediate area and contain incident if safe to do so. o Notify supervisor immediately. Supervisor to notify Environmental Manager immediately. o Implement additional containment measures. o Environmental Manager or Project Manager to notify APA or regulating authority(if required) and provide written notification of the incident occurring as soon as practicable.		The corrective actions register and incident register do not contain any occurrences of environmental harm (aside from the hydrocarbon spill discussed below) at Merri Creek (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). The corrective actions register does note waste that needs to be removed at Merri Creek (16/2/23) and prompts the installation of erosion and sediment controls at Merri Creek (2/2/23). These actions are not considered environmental incidents.	Corrective actions register & incident register	Not applicable
		Accidental spill or leak from plant or washout resulting in contamination of land or water	Follow Environmental Incident Response Procedure and Spill Response Procedure. Should a spill occur: o Stop the source of the spill. o Contain the spill if possible using sand bags, pads, etc. o Notify SCA Environmental Team and Project Manager immediately. o Clean up as advised by the Environmental Manager and Safety Manager.		The corrective actions register has noted a non-reportable hydrocarbon spill that occurred at the Merri Creek south biosecurity washdown on 6/2/23. The image shows the spill occurred on the rocky surface directly underneath the trailer (within the RoW). The second image shows what seems to be the rocky surface bagged up and binned. **Observation:** No incident report has been sighted, therefore, the auditors are unable to confirm the Spill Response Procedure was followed. The incident register does not contain this spill or record any other spills at Merri Creek.	Corrective actions register	Observation
		Unauthorised sediment discharge resulting in impact to waterways	Follow Environmental Incident Response Procedure including: - Contain discharge where possible. - Notify your supervisor of the incident. Environmental Officer to contact the Environmental Manager for advice. - Clean up if safe. Review controls and update SSESCP.		The corrective actions register and incident register do not contain any occurrences of Unauthorised sediment discharge resulting in impact to waterways at Merri Creek (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).	Corrective actions register & incident register	Not applicable
		Flood event/ warning	Weather will be tracked prior to and during these activities. The weather forecast will be discussed at prestart meetings and weekly team meetings In the event of any forecasted flood event, effective controls, will be implemented to ensure personnel are safe and there is no environmental harm (i.e. evacuate to elevated area and ensure any equipment, vehicles or items listed on the temporary works register are relocated to above the 1 in 20 year flood level) The Flood Warning and Evacuation Plan and Trigger Action Response Procedure will be followed at all times		Weather is tracked daily within the environmental aspects register (Melbourne Airport). **Observation:** auditors have not reviewed evidence that the weather forecast is discussed at prestart meetings and weekly team meetings or the flood protocol (outlined in column D) was followed.		Observation

54	Acceptable
0	Major non-conformance
1	Minor non-conformance
29	Observation
6	Opportunity for improvement
62	Not applicable
152	**TOTAL**

Site Specific Environment Management Plan – Conservation Area 28B (Rev 0)

KP 48, 49 & 49.5 - Conservation Area 28B

Document section	Title	Extract	Commitment	Evidence of Compliance	Aventus comments/findings	Document Reference	Compliant?
Compliance Measures							
1.2.2		Prepare a Management Plan for Conservation Area 28b which includes a Rehabilitation Plan	Prepare a Management Plan for Conservation Area 28b which includes a Rehabilitation Plan	This plan	Site Specific Environment Management Plan – Conservation Area 28B (18035-PL-HSE-0031), Rev 0 dated 3/11/22 has been sighted and contains a Rehabilitation Plan.	Site Specific Environment Management Plan – Conservation Area 28B (18035-PL-HSE-0031), Rev 0 dated 3/11/22	Acceptable
1.2.2	Vegetation Management protection	Implement Vegetation Management protection measures in accordance with EMM B1(ii). See next tab.	EMM B1(ii) – SSEMP Conservation Area 28b must include the following management measures: Temporary fencing must be installed and maintained along the boundary of the approved construction footprint.	Visual inspection	Auditors sighted fencing along the boundary of the approved construction footprint at KP48, 49 & 49.5.	Section 5.1 of the Site Specific Environment Management Plan	Acceptable
1.2.2			The locations for the temporary fencing must be identified on site by a licensed land surveyor and recorded, with the recorded survey marks to be provided to DELWP.		Audiors have not reviewed evidence to support this commitment.	Section 5.1 of the Site Specific Environment Management Plan	Observation
1.2.2			The temporary fencing is to be star pickets and wire fencing, with pickets driven up to 300mm deep at 5m intervals with continuous flagging along the fence and 'No Go Zones' signage at intervals not exceeding 30m	Visual inspection	Temporary fencing with signage was sighted at KP48, 49 & 49.5. However, continous flagging was not sighted. The auditors did not check the fencing depth and intervals as well as the signage intervals.	Section 5.1 of the Site Specific Environment Management Plan	Opportunity for improvement
1.2.2			Construction works, vehicle traffic and placement or storage of structures or materials are not permitted beyond the approved construction area with the Conservation Area.	Visual inspection	Auditors did not witness any construction works outside the approved construction area.	Section 5.1 of the Site Specific Environment Management Plan	Acceptable
1.2.2	Biosecurity		Complete weed and seed inspections of all vehicles and plant entering the Conservation Area. Inspection records must remain with the vehicle at all times when working in Conservation Area.		The auditors did not have the opportunity to check vehicles or plants for their weed and seed records during the audit.	Section 6.0 of the Site Specific Environment Management Plan	Observation
1.2.2			Set up and maintain vehicle washdown locations adjacent to (but outside of) Conservation Area to allow for washdown of vehicles as required following inspections. Vehicles washdown locations must include suitable bunding and waste management practises.	Visual inspection	Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).	Section 6.0 of the Site Specific Environment Management Plan	Observation

1.2.2	Pest plant / animal / pathogen control		Apply specific measures from the Environmental Line List in Conservation Area		The following management standard summary was within the APA CEMP ELL for conservation area 28b: • Site Specific Environmental Management Plan and Restoration Plan to be accepted by DELWP • Temporary fencing must be installed and maintained along the boundary of the approved construction footprint • Weed and seed • Biosecurity washdowns Out of the above listed management standards, the auditors are only able to confirm the temporary fencing was in place around the boundary of the construction area. The other management standards require additonal evidence (i.e., proof DELWP (now DEECA) have accepted this SSEMP and weed and seed record for plant, machinary and vehicles that have entered the site. The lack of biosecurity washdown(s) present during the audit warrants a non-conformance for several conditions.	Section 5.1 and 6.0 of the Site Specific Environment Management Plan	Observation
1.2.2			SSEMP		Site Specific Environment Management Plan – Conservation Area 28B (18035-PL-HSE-0031), Rev 0 dated 3/11/22 has been sighted		Acceptable
1.2.2			Temporary fencing must be installed and maintained along the boundary of the approved construction footprint.	Visual inspection	Auditors sighted fencing along the boundary of the approved construction footprint.		Acceptable
1.2.2			Weed and seed		The auditors did not have the opportunity to check vehicles or plants for their weed and seed records during the audit.		Observation
1.2.2			Biosecurity washdowns	Visual inspection	Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation
1.2.2	Reinstate Native Vegetation		Where natural regeneration of species in situ is not feasible, revegetate the area using seed or nursery stock obtained from within the local area, to support preservation of native vegetation values within the broader area.		N/A - scope of rehabilitation audit	Section 8.0 of the Site Specific Environment Management Plan	Not applicable
1.2.2			Prepare a Site Rehabilitation Plan for revegetation of native vegetation within the construction area.		The Site Rehabilitation Plan has been sighted within Site Specific Environment Management Plan – Conservation Area 28B (18035-PL-HSE-0031), Rev 0 dated 3/11/22.	Section 8.0 of the Site Specific Environment Management Plan	Acceptable
1.2.2			The rehabilitation plan is to be verified by a qualified and experienced bushland restoration land management contractor.		Appendix C has been sighted, demonstrating a qualified and experienced bushland restoration land management contractor has verified this plan.	Appendix C of this plan	Acceptable
1.2.2			Revegetation with native vegetation is to be undertaken in accordance with the Rehabilitation Plan.		N/A - scope of rehabilitation audit	Section 8.2 of the Site Specific Environment Management Plan	Not applicable

1.2.2			The Rehabilitation Plan is to include any specific monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils, as they arise.		This Site Specific Environment Management Plan – Conservation Area 28B contains monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils.	Section 5.3 Section 8.7 Section 9.0 of the Site Specific Environment Management Plan	Acceptable
1.2.2	Manage chemicals, fuels and hazardous materials		No chemicals, fuels or hazardous materials can be stored with the Conservation Area		Auditors did not sight any storage of chemicals, fuels or hazardous materials.	Section 5.2 of the Site Specific Environment Management Plan	Acceptable
1.2.2			Refuelling points must be located outside the Conservation Area where practical, or otherwise suitably bunded.		Auditors did not sight any refuelling points within the Conservation Area.	Section 5.3 of the Site Specific Environment Management Plan	Acceptable
CONSERVATION AREA 28B							
4			SCA will reduce the construction impact as far as reasonably practicable within Conservation Area 28b by: Clearly marking out the Project boundary and installing exclusion fencing with signage along the edge of the RoW to prevent unauthorised access into the Conservation Area. Exclusion fencing will be monitored daily and rectified immediately if found to be damaged or not in place.	Visual inspection	Auditors sighted the exclusion fencing with signage along the edge of the RoW at KP48, 49 & 49.5. No evidence has been reviewed by the auditors to verify exclusion fencing is monitored daily (i.e., daily inspections, with SCA advising that nil had been done when the auditors requested).		Minor non-conformance
4			Raising awareness of Conservation Area 28b through the Project Induction and Environmental Toolbox Talks. All personnel conducting works on the Project will be inducted	Project Induction & Records	Project induction specifies that KP 48.5-49 is a conservation area. Training register verifies that all personnel are inducted.		Acceptable
4			Managing topsoil in accordance with BPESC (IECA, 2008) which would involve: o Prevent mixing of topsoil and subsoils as far as reasonably practicable o Prevent the loss of the native seed bank within Conservation Area 28b topsoil o Minimise erosion of topsoil. o Stockpile topsoil at a maximum height of 3m.	Visual inspection	Topsoil stockpiles were sighted at KP48, 49 & 49.5 during the audit. Topsoil stockpiles did not exceed 3m. No subsoil stockpiles were present at the time of the audit. **Observation:** SCA advised that daily environmental inspections do not occur at Conservation Area 28b, therefore, the auditors are unable to verify if topsoil is being managed in accordance with column D.		Observation
4			Implementing the Reinstatement and Rehabilitation Plan		N/A - scope of future audit.		Not applicable
4			Control the dispersal and growth of weed species within Conservation Area 28b during and post construction.		N/A - scope of future audit.		Not applicable
5	ENVIRONMENTAL MANAGEMENT MEASURES						
5.1	Survey Set Out and Demarcation		Prior to mechanical construction activities occurring within Conservation Areas, SCA will survey the boundaries of the Conservation Area per the Survey & Site Setting Out Procedure	Visual inspection	Audiors have not reviewed evidence to support this commitment.		Observation
5.1			Temporary fencing will then be installed and maintained along the Conservation Area's construction boundary.	Visual inspection	Auditors sighted temporary fencing along the boundary of the approved construction footprint.		Acceptable
5.1			Temporary fencing will be temporary construction ATF fencing or star picket wire fencing with pickets driven up to 300mm deep at 5m intervals.	Visual inspection	Auditors sighted temporary fencing along the boundary of the approved construction footprint. The auditors did not observe the exact depth and intervals of the fencing.		Observation
5.1			Continuous flagging will be placed along the temporary fencing with 'No Go Zone' signage placed along the fencing at intervals not exceeding 30m	Visual inspection	Auditors sighted temporary fencing along the boundary of the approved construction footprint with 'no go signage'. The auditors did not observe the exact intervals of the fencing.		Observation
5.1			SCA will provide DELWP with the survey record of the temporary construction fencing along the Conservation Area boundary		Audiors have not reviewed evidence to support this commitment.		Observation

5.2	Chemical Management		SCA will following the following chemical management measures when working within Conservation Areas: - No chemicals, fuels or hazardous materials will be stored within Conservation Area 28b.		Auditors did not sight any storage of chemicals, fuels or hazardous materials within Conservation Area 28b.		Acceptable
5.2			Refuelling points to be located outside Conservation Area 28b where practicable, or otherwise refuelling will be suitably bunded and spill kits will be available at the point of refuelling.		Auditors did not witness any refuelling points within Conservation Area 28b or in proximity.		Acceptable
5.3	Sodic and dispersive soils		SCA will conduct spoil amelioration for trench backfill in accordance with the Sodic and Dispersive soils Management Plan (18035-PL-CN-0011) and ameliorate subgrade (subgrade is the soil horizon beneath topsoil) and topsoil in accordance with the soil amelioration rates identified in Property Management Plans (PMP for Property 1 LP38239 and Property 1 TP709759)		Auditors did not witness any amelioration or backfill at this site.		Not applicable
5.3.2	Soil Monitoring		Soil monitoring will be undertaken visually during the Daily Environmental Inspection. Visual monitoring will identify areas of soil erosion and signs of sodic and dispersive soil	Daily Environmental Inspection	SCA advised the auditors that nil daily environment inspections had been undertaken for conservation area 28b.		Major non-conformance
5.3.2			Corrective actions will be used to manage any hazards or non-conformances identified in the Daily Environment Inspection per SCA's CEMP		The corrective actions register and incident register do not contain any incidents at Conservation Area 28b (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). **Observation:** Given that daily environment inspections for this area are not undertaken (per above), the likelihood of picking up issues requiring corrective actions is compromised.	Corrective actions register & incident register	Minor non-conformance
5.3.2			Soil amelioration will also be monitored through chemical soil analysis (soil amelioration analysis). Soil amelioration analysis will be undertaken in a linear progression along the construction RoW to verify the soil has been ameliorated with the correct quantity of required ameliorant. Soil ameliorant analysis will be conducted per the Sodic and Dispersive Soils Management Plan.		Auditors did not witness any amelioration at this site.		Not applicable
6	BIOSECURITY AND WEED MANAGEMENT						
6.1	Weed Management		All plant and vehicles entering a Conservation Area will require a weed and seed inspection to be undertaken by SCA Environment Team or delegate and be free of potential weed and seed carrying material (e.g. mud)		The auditors did not have the opportunity to check vehicles or plants for their weed and seed records during the audit. **OFI:** a Vehicle register detailing the weed and seed checks and location would be a valuable tool for this condition.		Observation
6.1			SCA will issue a WORM Weed Hygiene Record to all plant and vehicles after the weed and seed inspection. The WORM Weed Hygiene Record will be carried within plant and vehicles at all times.		The auditors did not have the opportunity to check vehicles or plants for their weed and seed records during the audit.		Observation
6.1			Weed and seed inspections will be undertaken at a vehicle washdown bays located at either side (but outside) of the Conservation Area within the construction footprint.		Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown and weed and seed inspections were no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation

6.1			All vehicle washdown bays will have suitable drainage and bunding to contain and collect all washdown material for legal disposal.		Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation
6.1			Any weed species identified growing in topsoil stockpiles within Conservation Areas or at Conservation Area washdown bays will be immediately removed, by hand if possible, and legally disposed of.		Auditors did not sight any weed species growing on the topsoil within the conservation area visited during the audit (KP48, 49 & 49.5). The corrective actions register and incident register do not contain any incidents regarding weeds at Conservation Area 28b (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).		Not applicable
6.1			Any weeds identified in Conservations Areas will be added to the Environmental Line List to prompt maintenance during reinstatement and rehabilitation.		Auditors did not sight any evidence of weed species within the part of the conservation area visited during the audit (KP48, 49 & 49.5). The corrective actions register and incident register do not contain any incidents regarding weeds at Conservation Area 28b (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register).		Not applicable
6.2	Biosecurity		The risk of spreading pathogens into Conservation Area 28b will be managed during construction via the weed and seed hygiene process identified in section 6.1, which requires all plant and vehicles to undertake a washdown prior to entering Conservation Area 28b.		Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation
6.2			Pathogen awareness and training will also be delivered to the project construction team though the WORM Project Induction and Environmental Toolbox Talks (Appendix B) to ensure all Project personnel are aware of their biosecurity responsibilities and reduce the risk of spreading biosecurity threats as far as reasonably possible.		Audiors have not reviewed evidence to support this commitment.		Observation
6.2.1	Phytophthora		Inspections for signs of phytophthora dieback will be undertaken during the Daily Environment Inspection		SCA advised that nil daily environment inspections had been undertaken for conservation area 28b.		Major non-conformance
6.2.1			If dieback is identified: - Clean downs will be conducted for all plant, vehicles and personnel working within the area to remove soil from tools, plant and equipment, clothing and boots. Clean downs will be done with a blower and brush to remove soil and plant material (dust and grime have a low risk of spreading phytophthora). All material removed from plant, vehicles and equipment will be collected and legally disposed of.		The corrective actions register and incident register do not contain any incidents regarding dieback at Conservation Area 28b (last incident was documented on 28/03/23 in the corrective actions register and on the 16/05/23 in the incident register). **Observation:** Given that daily environment inspections for this area are not undertaken (per above), the likelihood of identifying areas of dieback is compromised.		Not applicable
6.2.1			Washdowns using water will be avoided where possible in and around areas of dieback. If wet washdowns are required, soil and mud will be removed manually before water is used.		No dieback has been identified, therefore, this condition has not been activated.		Not applicable

6.2.1			All material removed from washdowns will be collected and legally disposed of. No runoff from washdowns will be allowed to leave the construction footprint, this requirement is especially important around areas of bushland where phytophthora dieback will be the most devasting for the surrounding ecosystem.		Audiors have not reviewed evidence to support this commitment.		Observation
6.2.1			Driving will be minimised through washdown areas where practicable.		Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation
6.2.1			Disinfectant will be applied to plant, vehicles and tools after clean downs and washdowns		Auditors visited conservation area 28b once clear and grade and topsoil stockpiling had been completed, therefore, the commitment to have a vehicle washdown was no longer required (as per section 6.1 of this plan). No evidence has been reviewed by the auditors to verify the washdowns were in place and disinfectant was used before clear & grade (i.e., daily inspections, ((SCA advised that nil had been done when the auditors requested)).		Observation
7	FLORA AND FAUNA MANAGEMENT						
7			All flora and fauna management within Conservation Areas will be conducted in accordance with the Tree Management Plan and Fauna Management Plan.		A TPZ was sighted at KP48 with clear signage and fencing (that aligns with the requirements of the Tree MP).		Acceptable
7			Construction works, vehicle traffic and placement or storage of structures or materials are not permitted beyond the approved construction area within the Conservation Areas to prevent harm occurring to flora and fauna outside the construction footprint.		Auditors did not witness any construction works, vehicle traffic and placement or storage of structures or materials outside of the construction footprint during the audit.		Acceptable
7			Trees with significant conservation values adjacent to the construction footprint will have modified TPZ's erected.		A TPZ was sighted at KP48 with clear signage and fencing (that aligns with the requirements of the Tree MP).		Acceptable
7			Trees within significant conservation values adjacent to Conservation Areas and the required management measures required to protect these trees from construction have been identified in the Tree Management Plan.		The tree management plan does not contain the tree that was protected by a TPZ at KP 48.		Observation
7			Pre clearance inspections will be undertaken by a qualified Fauna Spotter Catcher with Wildlife Management Authorisation under the Wildlife Act 1975 (Vic) prior to clearing through Conservation Areas. The Fauna Spotter catching will identify and record any potential fauna habitat and salvage any fauna from these sites prior to clear and grade. The Fauna Spotter Catcher will also be present during clearing to manage any opportunistic fauna encounters.		Audiors have not reviewed evidence to support this commitment.		Observation
8	REINSTATEMENT AND REHABILITATION PLAN (focus of future audit the commitments are not included here)						
8.8	Existing Rocks		Any large surface rocks will be retained and where possible will be replaced back into the site. Returned rocks should be placed so that any oxidised surfaces remain exposed.		Auditors did not sight any rocks within the conservation area to be retained.		Not applicable
8.9			SCA will remove all rubbish, including dumped and wind-blown rubbish from the rehabilitated area during reinstatement and the defect liability period		Auditors did not sight any reinstament at this site.		Not applicable
9	MONITORING						

9			Monitoring will be undertaken through Daily Environment Inspections during construction	Daily Environment Inspections	SCA advised that nil daily environment inspections had been undertaken for conservation area 28b.		Major non-conformance
9			SCA will implement non-conformances, incidents and corrective action management within Conservation Areas per SCA's CEMP requirements.		Auditors have not reviewed evidence for this commitment.		Observation
9			Post construction, APA and SCA will conduct a site walkthrough within Conservation Area 28b and identify action items to be closed out for environmental protection		N/A - scope of rehabilitation audit.		Not applicable
9			Examples of actions include identification of weeds requiring treatment and signs of erosion		N/A - scope of rehabilitation audit.		Not applicable
9			CA will rectify any items raised in this walkthrough in a timely manner in priority of the identified hazards which have the greatest risk to the environment.		N/A - scope of rehabilitation audit.		Not applicable

17	Acceptable
3	Major non-conformance
2	Minor non-conformance
23	Observation
1	Opportunity for improvement
15	Not applicable
61	**TOTAL**

Attachment 3

Document records

Document Name	Document Number	Date/Rev
APA CEMP		
Spiecapag CEMP	18035-PL-HSE-0014	Rev C, 27/09/22
Deep Creek SSEMP	18035-PL-HSE-0029	Rev 1, 15/11/22
Jacksons Creek SSEMP	18035-PL-HSE-0027	Rev 1, 15/11/22
Health and Safety Management Plan	18035-PL-HSE-0003	Rev 3, 15/07/22
APA Emergency Response Plan	18035-PL-ER-0002	Rev 0, 19/09/22
Bushfire Management Plan	320-PL-ER-0016	Rev 1, 4/09/20
Traffic Management Plan	18035-PL-HSE-0013	Rev B, 16/10/22
Spiecapag ERP	18035-PL-ER-0002	Rev 0, 19/09/22
Wasco ERP	18035-PL-ER-0003	Rev 0, 09/09/22
Construction Noise and Vibration Management Plan	18035-PL-HSE-0015	Rev B, 08/11/22
Infrastructure Development Emergency Response Bridging Plan WORM Pipeline	18035-PL-ER-0004	Rev 1, 01/09/22
Fauna Management Plan	918035-PL-LH-0094	Rev 1, 01/09/22
Construction Noise and Vibration Management Plan	18035-PL-HSE-0015	Rev B, 08/11/22
Tree Management Plan	18035-PL-HSE-0016	Rev 1, 27/10/22
WORM Environmental Line List	18035-PL-HSE-004 CEMP	Rev 10, 10/01/23
Weekly Environmental Meeting Minutes		
Risk Register		
Weekly inspection reports		
Daily inspection checklists		
Environmental works SWMS	18035-SWM-HSE-0075	Rev B, 9/12/22
Fauna Catcher Spotter Activities SWMS	18035-SWM-HSE-0076	Rev 3, 9/12/22
Evacuation Attendance Record	SCA-HSE-FOR-012	
Training and induction register spreadsheet		
Environment induction slideshow		
WORM Plumpton to Wollert CHMPs 16593, 16594 and 18496 Cultural Heritage Induction prepared on behalf of APA VTS Australia (Operations) Pty Ltd		
Toolbox talk info sheets for snake awareness and biosecurity		

Document Name	Document Number	Date/Rev
Certificate (SHLA01326) in reptile and venomous snake handling (22500VIC)		
Wildlife control licence (14918164CX), expiry 30/06/23		
ACM30117 Certificate III in Animal Studies		
Letters of recommendations from Greendale Wildlife Shelter Inc & Five Freedoms Animal Rescue		
Weekly Construction Meeting Action Tracker		
Weekly Site Report 28		W/e 12/02/23
Weekly Site Report 29		W/e 19/02/23
Email correspondence shows the APA environmental advisor sending DEECA the APA WORM PL006918		
WORM Pipeline APA Weekly Environmental Inspections	18035-PL-HSE-ENVAUD001	26/10/22, 17/11/22, 12/12/22, 23/01/23 and 15/02/23
Spiecapag environmental aspects register (excel spreadsheet)		
WORM Pipeline APA Weekly Environmental Inspection reports	18035-PL-HSE-ENVAUD001	26/10/22, 17/11/22, 12/12/22, 23/01/23 and 15/02/23
Environmental aspects register		
Monthly Report 005 – 1st to 31st January 2023		
Monthly Report 006 – 1st to 28th February 2023		
WORM Incident Report – Environment (Safeguard+ Incident No. 510004)		
APA's Incident Investigation and Analysis Procedure (APA HSE GP 07.02)		
Email sent from the APA Acting Manager Access and Approvals to the Pipeline Regulation (DELWP)		15/02/23
Email sent from the APA Acting Manager Access and Approvals to the Pipeline Regulation (DELWP)		04/11/22
Corrective actions register		
Incident register		
SCA Environmental incident report form		24/10/22
SCA Environmental incident report form		9/2/23

Document Name	Document Number	Date/Rev
Email correspondence between Spiecapag Environment Advisor and Project Archaeologist at Biosis		
Complaints register		
Safeguard screenshots		
Minor Waterway Crossing Procedure		
Route Plans - KP 43, 10, 8 & 9.		
HDD Out of Hours Works	18035-PP-L-064	
Sample of communication records		
Conservation Area 34A (Merri Creek) biosecurity sign-in register		
Example SCA weed hygiene records dated 21/11/22, 18/1/23 and 27/3/23		21/11/22, 18/01/23, 27/3/23
SCA weed hygiene records		21/11/22, 18/01/23, 27/3/23
Biosecurity ToolBox talk info sheet for Merri Creek		
Environmental induction presentation		
Training and induction register		
Trenching Fauna Reports		
WORM - Pre-clearance Fauna Survey Report at KP 42 dated 06/02/23.		
Fauna permits 10010466		
Certificate of completion of course in reptile and venomous snake handling 2250VIC		
Property Management Plan (WPT 059)		
Corrective Actions Register		
Email from APA to Biosis reporting the relocation of a Flax-lily (APA 027)		
APA WORM Rev10 Tree Impact Assessment Report & Tree Protection Management Plan (aborist report)		
Notice of Consent to Damage C1874 for Victorian Heritage Inventory site Holden Cobbled Stone Road site (H7822-2283)		
Holden Cobbled Stone Road (H7822-2283), Consents to Damage: Historical Archaeological Supporting Documentation		

Document Name	Document Number	Date/Rev
Email correspondence between Spiecapag Environment Advisor and Project Archaeologist at Biosis		24/01/23
Geology and Geomorphology report, prepared by Environmental GeoSurveys Pty Ltd (Neville Rosengren) for Biosis Pty Ltd		Rev 1, 21/09/22
Environmental corrective actions register		
Spiecapag Environmental Line List		
Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services dated 28/03/23.		
Environmental corrective actions register		
Incident register		
Environmental corrective actions register		
Email correspondence between the Spiecapag environmental advisor and the Operations Coordinator at ANGAR environmental services		28/03/23
Email from the EPA to the SCA Envt Manager		26/01/23
APPENDIX 4 of Monthly Report 005		1-31 January 2023
Fuel consumption report		November 2022
Fuel consumption report		January 2023
SITE ACCESS APPROVAL NOTICE #FVCRM-4 & #FVCRM-3		
GWW agreement obligations spreadsheet		
Property Management Plans	WPT 059, WPT 067 and WPT072	
Property Management Register		
Daily checklist for Deep Creek		19/11/22, 20/12/22
Project GIS		
Property register		
Melbourne Water Creek Crossing Approval (Appendix D of Minor Watercourse Crossing Procedure)		
Daily inspections for Merri Creek		29/11/22, 02/02/23, 23/04/23, 24/04/23
Benthic Invertebrate Monitoring – Round 1 (Pre-construction condition) report.		

Document Name	Document Number	Date/Rev
Minor Watercourse Crossing Procedure	18035-PR-CN-0008	Rev C
Melbourne Water Creek Crossing Approval		Dated 2/12/21
Environmental aspects register		
Dewatering permits		15/12/22, 5/12/22, 16/01/23
Trench Dewatering Procedure	18035-PR-CN-0006	
Environmental aspects register		
SDS register - WORM Project Chemical Register		
SDS register - WORM Project Chemical Register		
Pre-start form		11/05/23
Incident report from APA (incident no. 514334).		
Waste Services Report from JJ's waste and recycling		06/02/23
Weekly inspection reports		
Email correspondence between the APA Acting Access and Approvals Manager SE Australia and the DELWP dated 17 November 2022		
APA (incident no. 514334)		
WASCO CEMP		
Main induction slides & site plan		
Induction register and induction check list		
Environment inspection checks		16/9/22, 19/11/22, 14/12/22, 15/01/23
N&V TBT minutes and attendance sheet		
Generator pre-start daily checklist		10/10/22, 11/10/22, 13/10/22
Plant pre-acceptance check list		19/10/22
Corrective actions register		
Weed hygiene declarations		
Letter from the technical supervisor at Boral		31/03/23
Corrective Action Register		
Asbestos disposal & license certificates		
Environmental inspections		
Burglar Liquid Waste invoices (27610 & 27823).		
Daily checks to monitor potable water, grey water and toilet water tank levels		

Document Name	Document Number	Date/Rev
Hazardous substance register		
Refueling of plant, vehicles and equipment SWMS		
Complaints register		
Merri Creek SSEMP		
SSEMP – Merri Creek	18035-PL-HSE-0028	Rev 1
Project Induction		
Environmental Toolbox Talks attendance sheets and slides		
Daily environmental checklists		23/04/23, 24/04/23
Site survey		
Corrective actions register		
Incident register		
WORM Weed Hygiene Record		
Pre-clearance inspections		
Complaints register		
Conservation Area 28B		
Site Specific Environment Management Plan – Conservation Area 28B	18035-PL-HSE-0031	Rev 0, 3/11/22

Attachment 4

Key audit photos

KP0 Fraser Rise – benched open trench, fauna caps on pipe, fenced to prevent fauna ingress

KP0 Fraser Rise – minor excursion of topsoil beyond the flagged construction RoW

KP1 – benched bell hole with fauna end cap

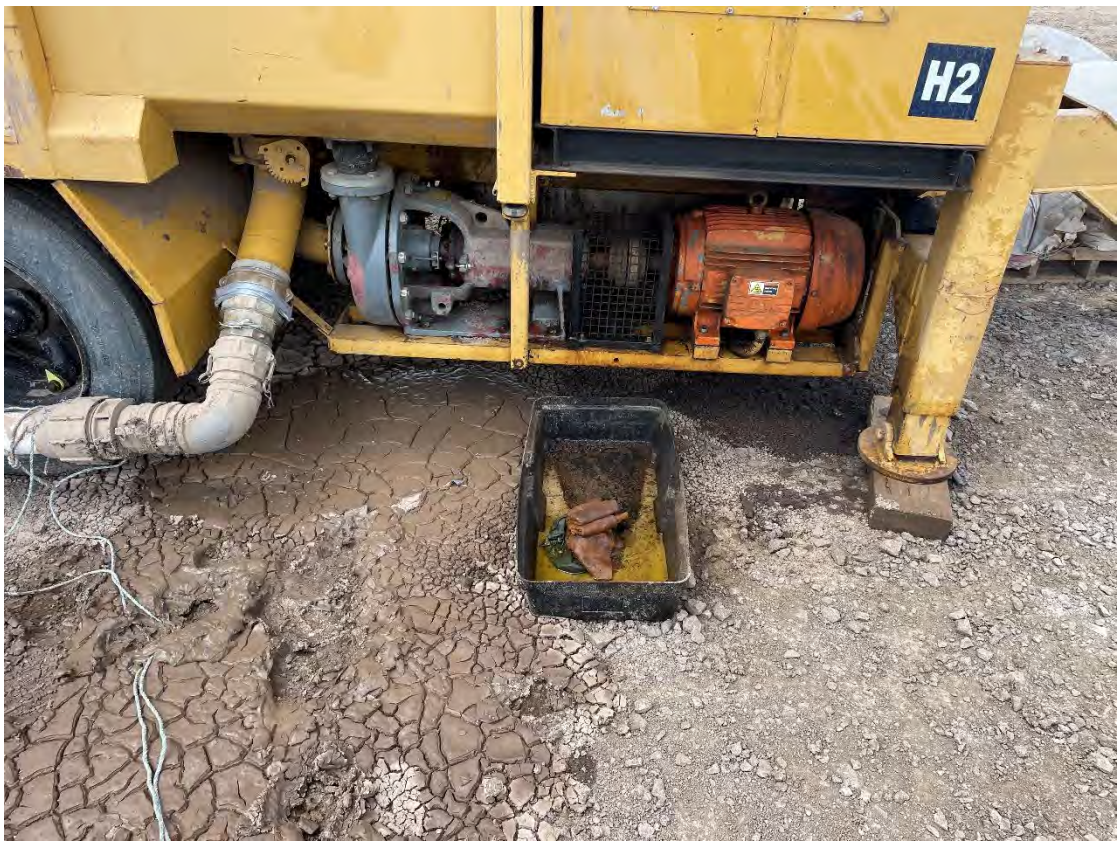
KP2 – boring under park in new residential area

KP2 – boring under park in new residential area

KP3.3 HDD at Melton Highway – HDD rig

KP3.3 HDD at Melton Highway – general waste skip

KP3.3 HDD at Melton Highway – example of poor storage of waste



KP3.3 HDD at Melton Highway – drip tray used under generator

KP5 – pipe joint coating without the use of drip mats

KP5 – soil fines reinstated in the trench prior to topsoil reinstatement

KP5 – reinstated trench spoil showing hazard taping prior to topsoil reinstatement

KP8.8 HDD at Calder Highway – entrance to HDD site showing poor installation of sediment fencing

KP8.8 HDD at Calder Highway – HDD rig

KP8.8 HDD at Calder Highway – chemical storage shed

KP8.8 HDD at Calder Highway – minor frac-out beyond the site perimeter

KP10.5 Unnamed tributary of Jackson's Creek – view across creek crossing

KP10.5 Unnamed tributary of Jackson's Creek – refuelling signage

KP16.8 HDD at Deep Creek – HDD rig

KP16.8 HDD at Deep Creek – mud sump using earthern bund

KP16.8 HDD at Deep Creek – cuttings treatment

KP16.8 HDD at Deep Creek – earthern bunding and sediment fencing on the downslope part of site

KP39.1 Donovan's Lane – pipe welding over the cleared RoW

KP39.1 Donovan's Lane – dust generation from the pipe string truck

KP42 Merri Creek – entrance to the creek biosecurity area

KP42 Merri Creek – washdown of project vehicle

KP42 Merri Creek – protection of old tree and relevant signage

KP42 Merri Creek – view across creek bank showing erosion and sediment controls

KP42 Merri Creek – coir logs that need to be properly installed to control runoff

KP43 – repairs to sediment fencing by Spiecapag Environment Advisor

KP43 – topsoil stockpile along the edge of the construction RoW

KP49 – stockpiled rock from dry stone wall

Compressor station – laydown area

Compressor station – bottom of batter, with minimal scouring and good vegetation cover

Compressor station – self-bunded diesel generator

Compressor station – diesel storage with bowser, pump and drip tray

Compressor station – sediment fencing downslope of the batter, preventing movement of soil off site

Compressor station – environmental information on display in the crib room