

Appendix D. IEA Verification



North East Link Freeway Packages
Independent Environmental Auditor

Review and Verification Report:

Eastern Freeway – Hoddle to
Burke Alliance

Tree Removal and Protection
Management Plan (TRPMP)

Major Road Projects Victoria

25 August 2025

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Document review and approval

Revision	Revision Detail	Author	Date	Reviewed and Approved by
0	Final Report	P Giang	25/08/25	D Pallozzi

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Inherent Limitations

This report has been prepared as outlined in the Scope and Approach Section. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirety and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by Major Road Projects Victoria (MRPV) and the Eastern Freeway – Hoddle to Burke Alliance (EHBA), consulted as part of the process. KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form. The findings in this report have been formed on the above basis.

Third Party Reliance

This report is solely for the purpose set out in the Scope and Approach Section and for MRPV's information, and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This report has been prepared at the request of the MRPV, a division of the Victorian Infrastructure Delivery Authority (an administrative office in relation to the Department of Transport and Planning), in accordance with the terms of KPMG's engagement contract dated 27 June 2023. Other than our responsibility to MRPV, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party (including, but not limited to, the Eastern Freeway – Hoddle to Burke Alliance (EHBA) on this report. Any reliance placed is that party's sole responsibility.

1. Introduction

The North East Link (NEL) Freeway Packages (NEL FP) is being delivered by Major Road Projects Victoria (MRPV) under the NEL Program (NELP) Environmental Management Framework (EMF), approved by the Minister of Planning, which details accountabilities for the implementation of the Environmental Performance Requirements (EPRs) in the development and delivery (including operation) of the NELP. The EPRs are a suite of performance-based environmental standards and outcomes that apply to the design, construction and operation of the NELP.

MRPV has appointed KPMG as the Independent Environmental Auditor (IEA) for the NEL Freeway Packages, in accordance with Section 2, *Roles and Responsibilities*, of the EMF.

The IEA scope of work for the Review and Verification assessment includes a desktop review of the Alliance Partner's environmental management and design documentation to assess compliance with the Program contract, including the EMF, EPRs, conditions of program approvals, and that works are in general accordance with the approved Urban Design Strategy (as applicable to the document(s) subject to review).

For the purposes of the IEA services, 'review and verify' means assessment and testing of an Alliance partner's environmental management and design documentation to meet the intent of the EMF and EPRs, conditions of project approvals and in general accordance with the Urban Design Strategy (UDS). Any references to 'review and verify' in this report have not been used in the context of their respective meanings under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance or an audit opinion have been expressed in this report.

This IEA Review and Verification Report is associated with the Review and Verification assessment of the document detailed in *Table 1* and provides the:

- Scope and approach used by the IEA in undertaking its review of the environmental management document; and,
- IEA Review and Verification assessment findings.

Table 1 - Document subject to IEA Review and Verification assessment

Document	Tree Removal and Protection Management Plan (Document Number: NEL-WST-NWA-4990-EEE-MPL-0005; Revision G; Dated: 19/08/25) (the Document).
Freeway package	The West Package consists of an upgrade of the western section of the Eastern Freeway between Hoddle Street in Collingwood to Burke Road in Balwyn North.
Package Alliance	Eastern Freeway – Hoddle to Burke Alliance (EHBA) - an Alliance comprising MRPV, Seymour Whyte Constructions Pty Ltd, John Holland Pty Ltd, Jacobs Group (Australia) Pty Ltd, Mott MacDonald Australia Pty Limited, which is MRPV's Preferred Proponent to execute the West Freeway Package scope of works described above.
Date of IEA assessment	26 June 2025 – 25 August 2025
Other relevant information	A full list of supporting EHBA project documentation reviewed as part of this review and verification scope, is provided in Appendix A.

2. Scope and Approach

Review of the Document and consideration of applicable Program contract requirements associated with the following:

- EMF;
- EPRs; and
- In general accordance with the approved Urban Design Strategy (insofar as it is applicable to the Document assessed).

The Review and Verification Assessment of the Document included the following approach:

- For the first revision of the Document submitted to the IEA, review the Document:
 - Against the Program contract requirements to assess whether the Document addresses and considers the Program contract requirements; and,
 - Assessing whether consultation, as and where specified by the EMF and EPRs, had been undertaken during preparation of the Document.
- For subsequent revisions of the Document submitted to the IEA, review of the Document considering whether comments from the previous IEA review had been adequately addressed, such that the Document complied with Program contract requirements.
- Findings and observations arising from review of each revision of the Document were represented as comments on a Comment Register (refer to Section 3 and Appendix B).
- Comments arising from review of each revision of the Document were subsequently returned to MRPV, and from MRPV to EHBA, to be addressed accordingly.
- When the IEA considered all comments to have been addressed by MRPV and EHBA, provision of this Review and Verification Report to MRPV.

Details of the Document revisions subject to this Review and Verification assessment are provided in Table 2.

Table 2 – Tree Removal and Protection Management Plan revisions subject to this IEA Review and Verification Assessment

Revision	Remarks scope of documents	Date submitted by MRPV and EHBA to IEA	Date IEA review comments provided to MRPV and EHBA	Date Verified by IEA
C	Initial revision submitted to the IEA for review.	26/06/25	08/07/25	N/A
D	Subsequent revision submitted to the IEA for review following IEA comment on Rev C.	25/08/25	01/08/25	N/A
E	Subsequent revision submitted to the IEA for review following IEA comment on Rev D.	07/08/25	11/08/25	N/A
F	Subsequent revision submitted to the IEA for review following IEA comment on Rev E.	14/08/25	19/08/25	N/A
G	Subsequent revision submitted to the IEA for review following IEA comment on Rev F.	20/08/25	25/08/25	25/08/25

3. IEA Review Findings

Findings identified during the Review and Verification assessment of the Tree Removal and Protection Management Plan were made directly, as comments, into a Comment Register (refer to Appendix B).

The IEA has assessed EHBA's Tree Removal and Protection Management Plan (Document Number: NEL-WST-NWA-4990-EEE-MPL-0005; Revision G; Dated: 19/08/25) against the requirements of the program contract, including the EMF and EPRs, conditions of Program approvals, and in general accordance with the approved Urban Design Strategy (insofar as it is applicable to the Document assessed). Any issues and non-compliances identified in previous revisions of the Document reviewed by the IEA have been closed out.



Appendix A - Documents Reviewed

Table A1 - Documents Reviewed



Doc #	Revision	Document Name	Date submitted by MRPV and EHBA to IEA
No additional documents were provided to the IEA as part of this review. Refer to Section 2, Table 2 for details of Document revisions subject to IEA Review and Verification Assessment.			



Appendix B - Review and Verification Assessment Comment Register

Document Register Document Comments & Responses - by Document

Project: North East Link Program
Document No NEL-WST-FIEA-4990-EEE-CRS-0005

Design Package	Document No	Original Revision	Phase	Item	Related Documents	All Docs related to Design Package	Raised By Company	Comments	Reference Contract Clause, Standard, Specification or Legislation	Date	Comment Category	Response Category	Reason Code	Comment Status	Closed out
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	The FIEA acknowledges that EPR AR1 references AS4970-2009 Protection of trees on development sites, however we note that an updated version of the Standard has come into effect (i.e., AS 4970:2025). The FIEA notes that Table 6.2 of the EMF states that the Environment Strategy must include "a process for managing, reviewing and approving major and minor revisions of the Environmental Strategy, including as a consequence of changes to environmental laws and legislative standards". On this basis, it is the expectation of the FIEA that relevant legislation/standards be up to date, and that AS 4970:2025 be the reference Standard for tree protection. Please include commentary within the TRMP to recognise the updated standards and update all references to this standard to AS 4970:2025.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	01,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Updated references to the AS4970-2025 standards throughout the document. The key changes between standards has been documented in section 2.1.1	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	01,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	02	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	The FIEA acknowledges that EPR AR1 references AS4970-2009 Protection of trees on development sites, however we note that an updated version of the standard has come into effect (i.e., AS 4970:2025). The FIEA notes that Table 6.2 of the EMF states that the Environment Strategy must include "a process for managing, reviewing and approving major and minor revisions of the Environmental Strategy, including as a consequence of changes to environmental laws and legislative standards". On this basis, it is the expectation of the FIEA that relevant legislation/standards be up to date and that AS 4970:2025 be the reference Standard for tree protection. 1) The Definitions section is deficient as it has not been updated to align with the terminology and requirements set out in AS4970:2025. 2) The Acronyms and Abbreviations section is deficient as it does not incorporate updates from AS4970:2025. 3) A significant deficiency exists in the continued use of the term "Diameter at Breast Height (DBH)" when AS4970:2025 now uses "Diameter at Standard Height (DSH)". 4) The document is deficient as it fails to include references to the Notional Root Zone (NRZ) alongside the Tree Protection Zone (TPZ).	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	02,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Updated references to the AS4970-2025 standards throughout the document. The key changes between standards has been documented in section 2.1.1	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	02,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	03	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR1 includes the requirement for AIAs to "verify existing details and inform the detailed design. Tree Removal Plan and Tree Canopy Replacement Plan (required by EPR AR3).". EPR AR2 includes the following requirement "The Tree Protection Plan(s) must provide details of any tree protection actions that will ensure that trees proposed to be retained are adequately protected from the impact of construction or related activities, prior to those works being undertaken." The document lacks adequate focus on both tree removal and tree protection procedures. For instance, section 1.3.1 does not explicitly identify that the potential impacts of any temporary works and the location of construction compounds (outlined in section 1.3.2) on trees will be assessed in the Arboricultural Impact Assessments (AIAs). Additionally, it does not ensure that all required tree protection measures will be installed in accordance with the Tree Protection Specifications and Tree Protection Plans outlined in the WEMP.	AR1, AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	03,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Have included commentary that all temp works and compound activities will be conducted in accordance with Section 7 which details the process of tree retention and protection through planning, design and construction.	AR1, AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	03,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1, AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	04	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR1 includes the following requirement "Tree retention must be maximised to the extent practicable" The objectives detailed in Table 1 fail to align with the Arboriculture EPRs. Furthermore, the targets identified in this table appear to be relevant to internal processes but lack relevance to the TRMP.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	04,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	The project have added additional measures within Section 7.5 to discuss construction methods to minimise impacts if unable to be avoided through design. This aligns with AR1 in maximising retention.	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	04,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	05	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR1 includes the following requirement "Tree retention must be maximised to the extent practicable" 1) The objectives detailed in Table 1 do not adequately align with the Arboriculture EPRs, including the requirement under EPR AR1 that "Tree retention must be maximised to the extent practicable." 2) Additionally, the targets identified in this table appear to pertain to internal processes rather than being directly relevant to the TRMP. 3) The inclusion of KPI Targets in Table 2 lacks clarity and may not align with the objectives of the TRMP. 4) Furthermore, the text in Table 1, as well as Table 6, fails to establish clear connections to the relevant EPRs, resulting in inconsistency.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	05,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Please see changes to Table 1 in relation to comments 1), 2) and 4) above. Please see addition of new Table 3 in relation to comment 3) above	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	05,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	06	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	Typographical errors remain throughout the document. Examples include, but not limited to: - The first sentence of section 2.2 is incomplete. - On page 38, the first paragraph is repeated. - Table 4 contains reference to Section 6. - Section 8 and Table 16 contains reference to Section 0. - Table 15 has 2 rows numbered 14. If the intention is to show a sequence of events the last two rows could be switched to ensure that the 3-year monitoring period is the final post construction measure.	N/A	#####	O	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	06,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Sections and Tables references have been updated.	N/A	#####	O	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	06,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	N/A	#####	O	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	07	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR1 includes the requirements for Arboricultural Assessments to verify existing details and inform detailed design. Table 4 (PRS Requirements) fails to align with AR1, as it does not effectively identify the importance of Arboricultural Assessments.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	07,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Table 4 is now Table 6. Inclusion of H17 Requirement 3. Tree Removal. Addition of F6 (vii) for Arboricultural assessment. Section references have been updated.	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	07,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	08	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR FF1 includes the requirement for "Undertaking pre-clearing surveys and inspections to confirm the on-site location of fauna immediately prior to habitat removal or, where relevant, works on waterways, and to assist fauna to safety as necessary" Table 5 does not adequately align with FF1, as it fails to identify the requirements for wildlife assessments, which must be conducted prior to tree removal. Additionally, section 9.2.2 lacks clarity and reinforcement regarding the need for pre-clearing inspections to include fauna and flora assessments conducted by a suitably qualified Ecologist.	FF1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	08,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Table 8 (previously Table 5) has been updated to include the relevant requirement for fauna in EPR FF1. Section 9.2.2 has been updated to include detail regarding the role of the project ecologist in the pre-clearing inspection process.	FF1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	08,01,01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed.	FF1	#####	M	N/A	LPE	C	N/A

N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	09	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	The FIEA acknowledges that EPR AR1 references AS4970-2009 Protection of trees on development sites, however, the FIEA note that an updated version of the Standard has come into effect (i.e., AS 4970:2025). The FIEA notes that Table 6.2 of the EMP states that the Environment Strategy must include "a process for managing, reviewing and approving major and minor revisions of the Environmental Strategy, including as a consequence of changes to environmental laws and legislative standards". On this basis, it is the expectation of the FIEA that relevant legislation/standards be up to date and that AS 4970:2025 be the reference Standard for tree protection. The document does not reference AS 4970:2025 in relation to Tree Protection Specifications (TPS) and Tree Protection Plans (TPP). Additionally, it does not adequately address the requirements of AR2, which requires that trees be adequately protected from the impacts of construction or related activities. The lack of alignment between AR2 and the Standard results in a lack of clear provisions to ensure that tree protection measures are maintained throughout the works.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	09.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Section 7 addresses all aspects on AS4970:2025 as well as AR2. The definitions of a TPS and TPP and how they related to EHBA management system are now included in section 7.2.3	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	09.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	10	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR1 includes the requirement for AIAs to "verify existing details and inform the detailed design, Tree Removal Plan and Tree Canopy Replacement Plan (required by EPR AR3).", Table 8 does not adequately align with AS 4970:2025, as the Standard specifically refers to the Arborist as the Project Arborist, a distinction that is not clearly addressed. Additionally, in accordance with AR1, Arboricultural Impact Assessments (AIAs) are required to inform the detailed design process, rather than only focusing on trees identified for removal. Furthermore, the role of the Project Arborist is not sufficiently outlined, particularly in regard to responsibilities such as conducting workforce training through toolbox meetings and ensuring the ongoing monitoring of tree protection measures.	AR1, AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	10.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Table 10 (previously table 8) amended to Project Arborist, as well as further changes to Responsibility column	AR1, AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	10.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1, AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	12	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR2 includes the requirement to implement Tree Protection Plans Section 7.4.1 does not fully align with AR2 and AS 4970:2025, as it fails to identify that tree protection measures may include ground protection within Tree Protection Zones (TPZs). The sole reference to ground protection measures is limited to row 12 of Table 15 which is deficient in clearly defining these measures as critical aspects of tree protection throughout the document.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	12.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	This is addressed in section 7.5.2. Table 15 is now table 19, row 8 has been updated to refer to section 7.5.2 for more comprehensive description of measures.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	12.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	13	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1 and AR3, canopy loss must be identified and used to ensure a net gain is achieved by 2045. The methodology used to collect and report canopy loss to MRPV is insufficiently explained and does not demonstrate clear alignment with the Environmental Performance Requirements (EPRs). Additionally, there is no confirmation that the methodology and reporting approach are consistent across all project areas.	AR1 and AR3	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	13.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	AR3 is to be captured in the Tree Canopy Replacement Plan. The tree protection and removal plan does not consider all aspects of the Canopy replacement objectives. Relevant sections regarding canopy loss are recorded in Table 6 against AR3	AR1 and AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	13.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1 and AR3	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	15	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, section 7.4.3 fails to confirm that tree protection fencing must be maintained and fit for purpose at all times.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	15.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Addressed in section 7.4.4	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	15.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	16	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, the second bullet point in section 7.4.3 lacks clarity and fails to specify that, if tree protection fencing requires relocation, appropriate ground protection measures must be implemented as identified by the Project Arborist.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	16.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Addressed in section 7.4.4 with reference to 7.5.2	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	16.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	18	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2, the last paragraph of section 7.5 is unclear and does not adequately identify that the Works Environmental Management Plans (WEMPs) and Site Environmental Plans (SEPs) will include the relevant Arboricultural Impact Assessments (AIAs), along with Tree Protection Specifications and Tree Protection Plans, in the appendices. Instead, it incorrectly focuses on outlining site-specific protection measures	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	18.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Addressed under section 7.5	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	18.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	19	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, Table 15 is unclear as it does not explicitly state that the Arboricultural Impact Assessments (AIAs) are stand-alone evaluations addressing the impacts of the design and construction methodologies. Additionally, it fails to clarify that the Tree Protection Specifications and Tree Protection Plans provide detailed descriptions of specific tree protection measures and their corresponding locations,	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	19.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Addressed in table 19 rows 1 and 2.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	19.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	20	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, Table 15 is incomplete as it does not include references to additional tree protection measures, such as ground or branch protection.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	20.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Addressed and referred to section 7.5.2 within table 19	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	20.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	21	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	To ensure consistency and in accordance with AS 4970:2025, Table 15 currently lacks clarity regarding the responsibilities of the Project Arborist to ensure that tree protection measures are fit for purpose. In addition, While the Project Arborist's role in weekly environmental inspections is mentioned in row 10, this responsibility is not sufficiently linked to their overarching duty to oversee and verify the effectiveness of tree protection measures.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	21.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Included row 8 in Table 19	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	21.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	22	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, The control measures outlined in Table 15, rows 8 and 9, fail to explicitly state that any Notional Root Zone (NRZ) encroachment must be identified in the Arboricultural Impact Assessment (AIA), irrespective of the level of encroachment.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	22.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Minor NRZ encroachment up to 10%, as per AS4970-2025 3.3.4 does not specify that the project arborist is required to be engaged. This is a requirement for section 3.3.5 and 3.3.6 only.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	22.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	23	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1, Table 15, row 14, requires further clarification to align with the EPR. The wording around staged removal for landscaping works suggests removal of additional trees could take place beyond those assessed in the AIAs. All impacts to trees, including from landscaping works, must be identified in the Arboricultural assessments, which should inform detailed design.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	23.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	This is in relation to the removal of protection fencing to facilitate landscaping works not removal of trees. This has been updated for clarity	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	23.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	24	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1, section 8.2 lacks alignment with the EPR as it does not reference staged vegetation removal.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	24.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Huddle to Burke Alliance	Further text added to section 8.2 in regards to staging, as well as item 4 in table 20	AR1	#####	M	N/A	LPE	O	N/A

N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	24.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	25	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1, the first bullet point of Section 8.2 does not fully align with the Environmental Performance Requirements (EPR), as it is limited and focuses on modifications to the design solely in terms of reducing excavation and fill to maximise tree retention. The FIEA notes that there are other feasible design changes may also contribute to tree retention,	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	25.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in 8.2	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	25.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	26	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	The reference to KPIs in section 8.2 is not appropriate for this document, which is to focus on compliance with the EPRs.	N/A	#####	O	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	26.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Removed	N/A	#####	O	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	26.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	N/A	#####	O	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	27	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1 and AR2, Table 16 currently does not identify the requirements for staged vegetation removal, which represents a gap in the documentation. Additionally, the table does not specify that Arboricultural Impact Assessments (AIAs) may identify the need for tree protection measures to be installed prior to any tree removal,	AR1 / AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	27.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in table 20 row 1 and 4	AR1 / AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	27.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1 / AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	28	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1 and AR2, Row 7 of Table 16 does not currently specify that the requirements for any tree pruning will be identified within the arboricultural assessments.	AR1 / AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	28.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in table 20 row 8	AR1 / AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	28.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1 / AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	29	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AS 4970:2025, Table 17 currently contains a deficiency in that it refers to Arborist Impact Assessments instead of the correct terminology, Arboricultural Impact Assessments (AIAs). Additionally, the table does not reflect the requirements outlined in AR2 and AS 4970:2025, which require that Tree Protection Specifications and AIAs must assess all potential impacts to trees and ensure their protection against construction or related activities,	AR1 / AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	29.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in Table 21	AR1 / AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	29.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1 / AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	30	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1 and AR2, as well as AS 4970:2025, Table 17 lack clarity on whether an Arborist Inspection Report is different to an Arboricultural Impact Assessment (AIA).	AR1 / AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	30.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in Table 21	AR1 / AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	30.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1 / AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	31	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	The last row in Table 17 lacks cohesion as pruning has been listed as the last stage of the process. The FIEA notes that Post Construction Tree Monitoring would occur after pruning.	N/A	#####	O	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	31.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Addressed in Table 21	N/A	#####	O	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	31.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	N/A	#####	O	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	32	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2, Section 9.2.3 currently presents a deficiency as it does not fully align with the Environmental Performance Requirements (EPR). The section restricts potential responses to tree decline post-construction to those identified in the four bullet points, which limits flexibility and adaptability. This does not account for the full range of measures that may be recommended by the Project Arborist based on site-specific conditions and the nature of the observed decline.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	32.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Have reworded. This list is not exhaustive and is provided as examples, the treatments will be guided by the project arborist as per their area of expertise.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	32.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	33	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR2 includes the requirement that "The Tree Protection Plan(s) must provide details of any tree protection actions that will ensure that trees proposed to be retained are adequately protected from the impact of construction or related activities, prior to those works being undertaken" The last paragraph of section 9.2.2 contains a deficiency as it contradicts the earlier reference to annual monitoring. If the intent is to emphasise the need for specific monitoring of trees with major Tree Protection Zone (TPZ) encroachments during the construction phase, this is not clearly conveyed. Additionally, the FIEA notes that specific monitoring requirements should be identified prior to the commencement of post-construction monitoring to ensure these trees are appropriately managed. Furthermore, the reference to controls at the monitoring stage is not relevant, as controls would generally be implemented earlier during the construction process rather than at the monitoring phase	AR2 / AR3	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	33.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	9.2.3 has removed the aspect of construction related phase and been documented in in 7.6 Table 19, Relevance of controls in section 9.2.3 is due to steps undertaken if the observed tree health is declining. This can be due to various factors and the controls listed are in response to improving the health of the tree post construction.	AR2 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	33.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2 / AR3	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	34	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR2 includes the requirement that "The Tree Protection Plan(s) must provide details of any tree protection actions that will ensure that trees proposed to be retained are adequately protected from the impact of construction or related activities, prior to those works being undertaken" Section 10.2 – Site Pre-starts / Toolbox Talks is deficient in its current form as it does not include reference to overall tree protection measures, such as types, locations and how to identify measures that are not fit for purpose.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	34.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Changes made to section 10.2	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	34.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	35	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR1, Appendix A currently deficient as it does not identify that Arboricultural Assessments will have informed the detailed designs at the second step of the process.	AR1	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	35.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	See text added to Appendix A above the flowchart	AR1	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	B	N/A	35.01.01	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	FIEA comment addressed,	AR1	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	C	N/A	14	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, Section 7.4.2 fails to specify that removing or moving tree protection measures is not permitted unless explicitly approved by the Project Arborist.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	C	N/A	14.01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway Hoddle to Burke Alliance	Updated under section 7.4.1	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	C	N/A	14.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Freeways IEA	Updates to section 7.4.1 are adequate, 1) However, the final paragraph of s 7.4.3 (was 7.4.2) states that works within a TPZ may be acceptable 'provided permission to enter ... is obtained' but does not specify the process for obtaining permission nor who must give permission. 2) The meaning of the final phrase ('the NRZ encroachment chart has been utilised') is unclear.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	C	N/A	14.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway Hoddle to Burke Alliance	This has been updated with inclusion of reference to Section 7.5 which documents the process of construction impacts and the approval process. The encroachment chart has been clarified through reference to Figure 9 which documents the encroachment and compensatory offsets,	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	C	N/A	14.01.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Freeways IEA	FIEA comment addressed,	AR2	#####	M	N/A	LPE	C	N/A

N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	EPR AR3 includes the requirement to "Develop and implement a Tree Canopy Replacement Plan to replace the canopy of native vegetation and amenity plantings removed as a result of the project and achieve a net gain in tree canopy cover by 2045." For consistency across the project, all trees >3 m in height is to be recorded and assessed, including those that are native trees within patches and with a Diameter at Standard Height (DSH) <10 cm. All tree canopy loss must be measured and reported to ensure later compliance with AR3 (canopy replacement) so even narrow-stemmed trees within patches must be recorded. While any loss of a patch will be offset under native vegetation offsets, the loss of tree canopy within the patch is separate and must be reported. Sections related to this, including sections 7.2.1 – 7.5.1.2, will also require updating in accordance with the new Australian Standard – AS 4970: 2025.	AR1 / AR3	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11,01	Tree Removal and Protection Management Plan (Rev C)	N	Eastern Freeway: Hoddle to Burke Alliance	Tree canopy replacement plan is to be separate from the Tree Protection and Removal Plan. This has been referred to in Table 9 with relevant sections within the plan. The TRPP is relevant for partial aspects of AR3 such as removals. The entirety of AR3 will be documented within the Tree Canopy Replacement Plan.	AR1 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Freeways IEA	Please clarify how canopy area of all trees to be removed will be measured if native trees with DSH < 10 cm are not assessed and reported. AR1 requires (inter alia) a TRP be developed and implemented that "... identifies all trees within the project boundary and includes: - Trees to be removed or retained as part of the works - The canopy area of all trees to be removed	AR1 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway: Hoddle to Burke Alliance	The Alliance surveys and records data as per the Australian Standard definition of a tree, discussed in section 5.1. Please be aware that the Alliance will develop a Tree Canopy Replacement Plan in line with AR3 at a later date when design and tree impacts have progressed further.	AR1 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11.01.01.01.01	Tree Removal and Protection Management Plan (Rev E)	N	Freeways IEA	The FIEA notes that s 5.1 states: "A tree is defined as a woody perennial, usually having one dominant vertical trunk. The minimum size of a tree included in the assessment was three metres, consistent with the definition in Australian Standards and the DELWP Guidelines for the removal, destruction or lopping of native vegetation (DELWP 2017)." However, text at s 7.2 states: "Trees [sic] within Ecological Vegetation Class (EVC) patches with a DSH of <10cm will not be individually assessed." It remains unclear: how canopy area of trees >3m tall but <10cm DSH that are within EVC patches, and are to be removed, will be accounted for if these trees are not being assessed and not included in the tree data. While AR3 might later be 'documented within the TCRP', it must be based on canopy area of all trees removed. As previously noted, 'the canopy area of all trees to be removed' is a requirement of AR1.	AR1 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11.01.01.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway: Hoddle to Burke Alliance	Reference to not surveying trees with DSH of <10cm removed. Trees within Project Boundary surveyed and assessed as per Australian Standards.	AR1 / AR3	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	D	N/A	11.01.01.01.01.01.0	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	Comment closed 14/08/2025	AR1 / AR3	#####	M	N/A	LPE	C	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17	Tree Removal and Protection Management Plan (Rev C)	N	Freeways IEA	In accordance with AR2 and AS 4970:2025, Section 7.5 is deficient as it does not specify that any requirements for 'construction' within a Tree Protection Zone (TPZ) should be identified within the Arboricultural Impact Assessments, rather than being subject solely to approval by the Environmental and EPR Manager. Furthermore, this section, along with sections up to 7.5.1.2, requires updating to align with AS 4970:2025, particularly regarding references to TPZ encroachments, to ensure compliance with current standards and best practice.	AR2	#####	M	N/A	LPE	O	Yes
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway: Hoddle to Burke Alliance	This has been updated and included AS4970:2025 for encroachment. Section 7.5.2 has been included under 7.5 construction impacts to document the additional controls to implement when conducting works inside of the trees NRZ	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Freeways IEA	Updates to reflect AS 4920:2025 terminology are satisfactory. However, the following areas do not adequately address AR2: 1) The wording of section 7.5, paragraph 3 remains deficient and does not respond adequately to comment 17: "Construction into the NRZs of trees is allowed Per AS4970:2025, providing approval is given by the Project Arborist and Environment and EPR Manager. The level of encroachment allowed is based upon the percentage of NRZ area intruded upon". The wording suggests that ad-hoc impacts can be approved with no record of the decision-making process, which is not in accordance with AR2. This section is deficient in incorporating an explicit reference to how these impacts and approvals are assessed and documented. 2) Similar wording is repeated in the first paragraph of section 7.5.2, except it suggests that approval of 'construction' within the TPZ could be given by the Environment and EPR Manager alone, which is not in accordance with the role of the project arborist in AS4970:2025. Consider deleting this sentence. 3) Section 7.5.2 also includes examples of protective measures within the TPZ in Table 18. However, the measures on row 3, Root Protection, suggest minimal project arborist involvement while permitting potentially significant impacts to trees, especially where larger roots than expected are encountered during approved encroachment works. The protective measures should specify project arborist involvement or review where root pruning is required. For instance, "When roots are impacting they should be pruned in accordance with AS 4373" does not seem to require any project arborist assessment to determine whether the tree would remain viable.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway: Hoddle to Burke Alliance	References have been made in Sections 7.5 and 7.5.2 to the requirement for approval by both the Project Arborist and the Environment and EPR Manager. This clarification eliminates the potential for ad-hoc approvals by explicitly linking the approval process to Section 7.5. Additionally, Section 7.5.1 outlines the decision making process, stating that "An assessment of minor, moderate, and major encroachments into NRZs is assessed as part of the WEMP and Site-specific AAs or Tech Memos produced by a Project Arborist in reference to the construction design and methodology. Protective measures have been updated to include arborist assessment for root impacts. Arborist involvement is also emphasised in Section 7.5.2, which states that "Additional measures will be determined through consultation with the Project Arborist and the Environment and EPR Manager." This highlights that protective measures are determined through consultation with the arborist, ensuring their active involvement in the decision-making process.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01.01	Tree Removal and Protection Management Plan (Rev E)	N	Freeways IEA	There is a duplication of content, with the same paragraph appearing twice: once in Section 7.5 (3rd paragraph) and again in Section 7.5.2 (1st paragraph). This repetition is inconsistent, as the content in Section 7.5.2 refers to construction impacts (aligned with the Section 7.5 heading) rather than protective measures. Consider removing it from Section 7.5.2. Additionally, the final sentence of the first row in Table 18 has been edited to reference Figure 10 twice. While the "Root Protection" row in Table 18 is satisfactory, please clarify the inconsistencies above for clarity and accuracy of the document.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01.01.01	Tree Removal and Protection Management Plan (Rev E)	N	Eastern Freeway: Hoddle to Burke Alliance	Duplicate content has been removed - Section 7.5.2 has been revised as below: "Protective measures are required to minimise impacts on trees during construction activities within TPZs. The SRZ is required to be always maintained for trees that are to be retained, and any encroachment will result in the tree requiring removal due to the impacts discussed in Section 7.4.2. If impacts to trees cannot be avoided through design, the Project will assess encroachment as per Section 7.5.1, and implement construction methods that minimise harm to the NRZ. Additional protective measures are to be considered to further minimise impacts from the approved works. These measures will be determined in consultation with the Project Arborist and the Environment and EPR Manager" Table 18 Figure 10 duplicate reference has now been removed.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01.01.01.01	Tree Removal and Protection Management Plan (Rev E)	N	Freeways IEA	Changes noted and accepted. Two minor things: 1) The 3rd para of s 7.5.2 is missing the word 'Arborist': "...the Project will assess encroachment..." should be "...the Project Arborist will assess encroachment..." 2) Encroachment into the SRZ does not always require tree removal. For instance, a pier located within the SRZ but clear of structural roots would not damage the tree nor would it require tree removal. Therefore, consider updating "...will result in the tree requiring removal..." to "...may result in the tree requiring removal..." at both the 3rd para of s 7.5 and the 2nd para of s 7.5.2.	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01.01.01.01.01	Tree Removal and Protection Management Plan (Rev D)	N	Eastern Freeway: Hoddle to Burke Alliance	Amendments to s 7.5 and s 7.5.2 made as per above comment	AR2	#####	M	N/A	LPE	O	N/A
N/A	NEL-WST-FIEA-4990-EEE-CRS-0005	E	N/A	17.01.01.01.01.01.01.0	Tree Removal and Protection Management Plan (Rev E)	N	Freeways IEA	FIEA comment addressed	AR2	#####	M	N/A	LPE	C	N/A

