



**SUBURBAN
RAIL LOOP**

SRL East Independent Environmental Auditor – Six-Monthly Findings Summary Report

May 2025 – November 2025



**SUBURBAN
RAIL LOOP**
AUTHORITY



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Table 1: GLOSSARY OF ABBREVIATIONS

Abbreviation	Expanded form
CEMP	Construction Environmental Management Plan
EES	Environment Effects Statement
EMF	Environmental Management Framework
EPA	Environment Protection Authority Victoria
EPR	Environmental Performance Requirement
GED	General Environmental Duty
IEA	Independent Environmental Auditor
ISO	International Standards Organisation
NC	Non-compliance
POSF	Public Open Space Framework
SEMP	Site Environmental Management Plan (synonymous with WEMP)
SRL	Suburban Rail Loop
SRLA	Suburban Rail Loop Authority
TBM	Tunnel Boring Machine
UDLP	Urban Design and Landscape Plans
UDS	Urban Design Strategy
WEMP	Worksite Environmental Management Plan (synonymous with SEMP)

Table 2: GLOSSARY OF TERMS

Term	Description
Contractor	The terms 'Contractor' or 'Contractors' within this report apply to contractors engaged by SRLA to deliver a works package for SRL East, and whose activities the IEA will review and audit over the course of the Project.
Contractor EMS	Environmental Management System developed and implemented by contractors in accordance with ISO 14001:2015

Term	Description
Early Works	Early Works are approved under the Suburban Rail Loop (East) Planning Scheme Amendment GC197 and Incorporated Document and must comply with the SRL East Environmental Management Framework. Early Works are activities primarily comprised of Preparatory Works associated with the phased delivery of SRL East. Preparatory Works are defined in the Incorporated Document.
Incorporated Document	The SRL East Incorporated Document dated August 2022
Independent Environmental Auditor	Independent Environmental Auditor appointed pursuant to the Environmental Management Framework (EMF) endorsed by the Minister for Environment and Climate Action
Initial Works	Works described as excluded works (known as Initial Works) in Schedule 1 of the Public Works Order and published in Victoria Government Gazette No. S 682 (22 December 2020) and as amended on 5 August 2021 that are being delivered under the requirements of the Initial Works Management Plan as endorsed by the Minister for Planning on 19 December 2021.
Minor non-compliance	Early Works: The evidence demonstrates that the criteria has been partially met and at present does not fully meet the relevant project environmental obligations. Tunnels North and South: A deficiency in the implementation of the relevant element of the documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
Major non-compliance	Early Works: The evidence either demonstrates that the criteria has not been met, or there was an absence of evidence demonstrating that the criteria had been met. As such the corresponding aspect of the project environmental obligations is not being met. Tunnels North and South: The absence of, or the failure to implement and maintain, one or more requirements of the relevant environmental documentation, or a situation, which would, based on available objective evidence raise significant doubt as to the effectiveness of environmental management. Note: A Major Non-compliance may be an individual non-compliance or a number of minor but related audit non-compliances, which when considered in total are judged to constitute a non-conformance.
Project environmental obligations	This refers to the environmental obligations for the Project, which cover managing risks to the environment and human health and the conditions of the SRL East approvals, including the EMF, EPRs and UDS, against which compliance of a Contractor's environmental documentation and management plans will be assessed through review and verification by the IEA as well as delivery of the IEA compliance audit program.
Suburban Rail Loop	SRL is an integrated rail and precincts program, consisting of a proposed 90-kilometre orbital rail line extending from Cheltenham to Werribee and planning for the surrounding precincts around each SRL station.
Suburban Rail Loop Authority	Suburban Rail Loop Authority (SRLA) is the proponent for the Project and is responsible for planning and delivering Suburban Rail Loop (SRL). SRLA was established in September 2019, and became a statutory authority in December 2021, governed by the <i>Suburban Rail Loop Act 2021</i> .

Term	Description
Suburban Rail Loop Authority EMS	Environmental Management System developed, implemented and maintained by SRLA, aligned to ISO 14001:2015
Suburban Rail Loop (East)	Suburban Rail Loop (East) is the section of Suburban Rail Loop between Cheltenham and Box Hill, currently under construction.
Tunnel and Civils	Tunnel and Civils are Main Works and are approved under the Suburban Rail Loop (East) Planning Scheme Amendment GC197 and Incorporated Document and must comply with the SRL East Environmental Management Framework. Tunnel and Civils are activities primarily comprised of Tunnel Works associated with the phased delivery of SRL East. Main Works are defined in the Incorporated Document.
Tunnels South	The segment of Main Works that is being delivered from Cheltenham to Glen Waverley, by Suburban Connect (Contractor engaged by SRLA).
Tunnels North	The segment of Main Works that is being delivered from Glen Waverley to Box Hill, by Terra Verde (Contractor engaged by SRLA).

1. Introduction

1.1. Role of the IEA

Nation Partners Pty Ltd (Nation Partners) and Helman Environmental Consulting (HEC) are Independent Environmental Auditors (IEAs) for Suburban Rail Loop (SRL) East, pursuant to the Environmental Management Framework (EMF) endorsed by the Minister for Environment and Climate Action.

The role of the IEA as outlined in the EMF is to provide independent review and verification of compliance with the conditions of the SRL approvals including the EMF, Environmental Performance Requirements (EPRs), Urban Design Strategy (UDS) and Public Open Space Framework (POSF) and to:

- Audit compliance of contractors' construction works and operations against environmental obligations, including environmental legislation, approval conditions, construction environmental management plans (CEMPs), operational environmental management plans (OEMPs), the EMF and EPRs.
- Conduct audits of Suburban Rail Loop Authority's (SRLA's) compliance with relevant EPRs and SRLA's Environmental Management System (EMS).

1.2. Report Purpose and Structure

The SRL East Project (the Project) is being delivered by several contractors, each with separate scopes of work. Nation Partners is the appointed IEA for the Early Works scope, while HEC is the appointed IEA for Tunnels North and Tunnels South work packages. This Summary Report (Report) presents the IEA audit activities and subsequent findings from both IEAs auditing the project. This report captures the fifth six-month reporting period for the Early Works scope, the second six-month reporting period for the Tunnels South package, and first six-month reporting period for the Tunnels North package. The Report has been jointly prepared by both IEAs and SRLA to provide specific detail relevant to the audit program for the reporting period of 11 May 2025 to 10 November 2025 (the 'reporting period').

This Report provides compliance status with respect to the SRL East EMF, EPRs, the Contractors' Environmental Strategies, CEMPs, Worksite Environmental Management Plans (WEMPs) and other management plans or procedures as specified as being required in the EMF and EPRs. It is a requirement of the SRL East EMF, as specified in Section 6.2.1, that the IEA and SRLA prepare this summary report every six months.

This Report is structured as follows:

- **Section 2:** Audit Program – summarises key elements of the audit program, including objectives, scope, risk-based approach, compliance status and corrective actions
- **Section 3** – summarises the key audit details and outcomes relevant to the Early Works contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Early Works contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- **Section 4** – summarises the key audit details and outcomes relevant to the Tunnels South contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- **Section 5** – summarises the key audit details and outcomes relevant to the Tunnels North contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- Appendices
 - **Appendix A** – EMF / EPR criteria audited during the reporting period for the Early Works Contractor
 - **Appendix B** – EMF / EPR criteria audited during the reporting period for Tunnels South Contractor
 - **Appendix C** – EMF / EPR criteria audited during the reporting period for Tunnels North Contractor
 - **Appendix D** – Statement of Limitations and Disclaimer

Note - Initial Works are being delivered under planning approvals obtained separately from the Early Works that were assessed as part of the SRL East Environment Effects Statement (EES). Initial Works commenced prior to Early Works, are not subject to the requirements of the EMF and fall outside the scope of the IEA's role.

2. Audit Program

2.1. Objectives

The objectives of the IEA compliance auditing program are to ensure that SRLA and Contractor activities:

- Comply with environmental duties under the *Environment Protection Act 2017* and other relevant environmental legislation
- Comply with the Project's environmental obligations, including those set out in the EMF and EPRs
- Comply with the (IEA verified) SRLA and contractor documents and management plans
- Appropriately mitigate risks to human health and the environment
- Include continual improvement opportunities in environmental management, performance, legislative and policy compliance.

2.2. Scope

The EMF requires that the IEA conducts the following audits:

- EMF and EPR Compliance Audits (quarterly)
- Routine Environmental Performance Audits (monthly).

For each Quarterly EMF / EPR audit, the IEA assesses compliance of the construction activities with the EMF, relevant EPRs and conditions of the Project approvals. Table 3 describes the scope of EMF / EPR compliance audits in accordance with the EMF.

Table 3: EMF and EPR quarterly compliance audit details

Characteristic	Detail
Auditees	SRLA and Contractors
Frequency	Quarterly. Early Works construction commenced in May 2023, and audit activities commenced three months post the commencement of construction (August 2023). Tunnels South construction commenced in November 2024, and audit activities commenced three months post the commencement of construction (February 2025). Tunnels North construction commenced in July 2025, and audit activities commenced three months post the commencement of construction (September 2025).
Locations	Desktop and project sites (risk based)
Scope	SRLA and Contractor compliance with, and implementation of the EPRs and the Environmental Strategy, CEMP, WEMPs, OEMP, and other plans required by the EPRs and conditions of approval. Compliance with every applicable EPR to be audited annually. High-risk activities to be audited more frequently. The Contractors are responsible for compliance with the majority of EPRs listed in the EMF. SRLA is responsible for compliance with several EPRs, and some have been assessed as not applicable to a Contractor or have not as yet been triggered by the works. SRLA is audited separately for compliance against the EPRs for which it is responsible.
Inputs	Observations of project activities Interviews with Contractor / subcontractor, and SRLA personnel

Characteristic	Detail
	Review of documents and records
Stage	Construction and first two years of operation (or until Minister for Planning is satisfied that audits are no longer required)

For each Routine Monthly Environmental Performance Audit, the IEA assesses compliance of the Contractor's construction activities with the applicable WEMPs through a monthly rotation of visits to each active project site. Table 4 describes the scope of Routine Monthly Environmental Performance Audits.

Table 4: Routine monthly environmental performance audit details

Characteristic	Detail
Auditees	Contractors
Frequency	Monthly, starting 6 months from commencement of project works. Early Works construction commenced in May 2023, and routine monthly environmental performance audits commenced in November 2023. Tunnels South construction commenced in November 2024. Routine monthly environmental performance audits also commenced in November 2024. Tunnels North construction commenced in July 2025. Routine monthly environmental performance audits commenced in August 2025.
Locations	Rotation at active construction sites, compounds, laydown areas (all sites visited within a 3-month rotation).
Scope	Contractor compliance with CEMP, WEMPs and other applicable management plans
Inputs	Observations of project activities Interviews with contractor / subcontractor. Review of documents and records, including: ▪ Environmental monitoring, process monitoring and management performance monitoring results ▪ Work method statements, site plans ▪ Incidents and a representative set of complaints records ▪ Inspection and audit reports ▪ Soil and waste management records ▪ Surveys ▪ Meeting minutes ▪ Monthly reports ▪ Other documents relevant to assessing compliance and the technical adequacy and effectiveness of actions taken to comply with the applicable WEMPs
Stage	Construction and first two years of operation (or until Minister for Planning is satisfied that audits are no longer required).

2.3. Risk Based Approach

The IEA adopts a risk-based approach to conducting compliance audits, founded in the guiding principles of AS/NZS ISO19011:2019 – *Guidelines for Auditing Management Systems*. Compliance with all EPRs is audited at least once every 12 months and higher risk activities may be audited more frequently. Higher risk activities are determined through consideration of (but not limited to):

- Outputs from SRLA and contractor risk assessments
- Work activities with an inherent higher risk of environmental impact
- Work activities being undertaken in locations proximal to environmentally sensitive areas (e.g., watercourses, ecologically sensitive areas, residences)
- Intensity / amount of work in progress at each site
- Work activities with the potential to contribute to cumulative environmental impacts
- Complaints received, recent incidents, and/or non-compliances
- Results of previous audits including corrective action rectification.

Audit sites were selected by the IEA on the basis that they provided a representative sample of the locations in which Project construction activities were being undertaken. The nature of the risk associated with the activities, including their interface with sensitive receptors, namely the environment and surrounding communities is considered. Each active construction site is visited at least once each quarter.

2.4. Compliance Status

In accordance with AS/NZS ISO19011:2019, a qualitative scale is used to categorise audit findings. Slightly different audit findings classifications were adopted by the IEAs for the Early Works and Main Works audits, as outlined in Section 2.4.1 and 2.4.2.

2.4.1. Early Works compliance classifications

Table 5 and Table 6 below summarise the compliance classifications adopted by the IEA for Early Works for the quarterly and monthly audits, respectively.

Table 5: Quarterly audit outcome compliance classifications

Audit Outcome Classifications	Definition
Compliant	The evidence demonstrates that the criteria under consideration has been met.
Minor Non-compliance (Minor NC)	The evidence demonstrates that the criteria has been partially met and at present does not meet the relevant project environmental obligations.
Major Non-compliance (Major NC)	The evidence either demonstrates that the criteria has not been met, or there is an absence of evidence demonstrating that the criteria has been met. As such the corresponding aspect of the project environmental obligations is not being met.

Table 6: Monthly audit outcome compliance classifications

Audit Outcome Classifications	Definition
Low risk finding	Non-conformity with CEMP or sub-plan which will not result in direct environmental harm. Minimal, localised environmental impact / low potential for health and well-being impacts.
Medium risk finding	Issue that may result in non-compliance with a project approval. Potential or actual environmental harm or impact to human health over an extended period of time and/or requires considerable remediation.
High risk finding	Non-compliance with regulatory requirement or project approval. Permanent or long-term serious environmental harm or long-term harm to health and well-being.

2.4.2. Tunnels South and Tunnels North compliance classifications

Table 7 summarises the compliance classifications adopted by the IEA for Tunnels South and Tunnels North audits.

Table 7: Audit outcome compliance classifications

Audit Outcome Classifications	Definition
Compliant	There is sufficient objective evidence to demonstrate the audit criterion has been fulfilled.
Major Non-compliance	The absence of, or the failure to implement and maintain, one or more requirements of the relevant environmental documentation, or a situation, which would, based on available objective evidence raise significant doubt as to the effectiveness of environmental management. Note: A Major Non-compliance may be an individual non-compliance or a number of minor but related audit non-compliances, which when considered in total are judged to constitute a non-conformance.
Minor Non-compliance	A deficiency in the implementation of the relevant element of the documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.
Observation	An audit finding which may relate to an incidental or isolated system discrepancy, which does not compromise the effectiveness of environmental management, or constitute an actual or potential environmental risk.
Undetermined	There is insufficient evidence to make a judgement on compliance.
Not applicable	The auditable element falls outside the scope of the audit, e.g., work relevant to the element being audited has not yet commenced.

2.5. Corrective Actions

Corrective actions to address compliance audit findings are the responsibility of SRLA and its Contractors. Corrective actions are not prescribed by the IEA, but are determined, implemented, and tracked by the Contractor and/or SRLA. The IEA is responsible for auditing corrective action status, including the effectiveness of remedies and the status of actions

taken to address findings (i.e. whether the IEA considers the finding has been adequately addressed and can be closed), prior to, or during, the subsequent compliance audit.

The IEA monitors the technical adequacy of corrective actions to address non-compliances through the compliance audit program and provides its opinion on the status of findings.

3. Early Works

3.1. Early Works Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in Table 5.1 of the EMF is subject to a process of review or verification and approval or acceptance. The IEA has continued its work in the review and verification of environmental documentation and management plans against the overarching Project environmental obligations and the EPRs as these new stages of work have commenced. Further, the IEA has also reviewed any major revisions of previously verified documentation. The IEA during its review process considered the technical adequacy and effectiveness of actions proposed in the documentation.

In addition, the IEA monitors SRLA and Contractor compliance with approval conditions during its construction activities via a program of regular compliance audits. During this reporting period, Early Works scope elements were delivered under two different contractual arrangements:

- Under the supervision of the Initial and Early Works Managing Contractor – Laing O’Rourke (as per previous reporting periods)
- As SRLA Managed Works, in which utility providers were engaged directly by SRLA.

Both contractual arrangements were subject to IEA audits during the reporting period, as follows:

- Three Quarterly Audits¹ - the Managing Contractor was auditee on two occasions (in May 2025 and August 2025), while SRLA Managed Works contractors were the auditees on one occasion (October 2025).
- Seven Monthly Audits – the Managing Contractor being the auditee on six of the monthly audits, with SRLA Managed Works Contractors subject to an audit in October 2025.

Active construction sites visited during the reporting period included Glen Waverley, Burwood, and Southern Stabling Yard (SSY).

The scope of the Compliance Audits was determined and agreed by relevant stakeholders with a draft Audit Plan issued for comment prior to finalisation of the agreed scope. The IEA sought input and verification from SRLA on the relevance of select EPRs to Early Works scope. As a result, a number of EPRs remain out of scope, as all or key parts of these EPRs had not been triggered by Early Works to that point, or do not apply to Early Works scope (refer to Table A-1).

During the reporting period, the IEA monitored SRLA and Contractor progress to address audit findings. At the commencement of the reporting period, there were twelve Monthly audit findings, and six Quarterly audit findings considered ‘open’ that were raised during previous reporting periods². All of these were closed during this reporting period.

3.2. Early Works Audit Findings

3.2.1. EMF and EPR Quarterly Compliance Audits

The IEA found that the majority of the EPRs audited during this reporting period were considered compliant. One (1) Major Non-compliance and five (5) Minor Non-compliances (Minor NC) were raised, all of which were closed during the reporting period. The following sub-sections summarise the audit findings.

¹ Scope periodically includes Contractor EMS

² Of the twelve monthly findings, eleven were raised in the November 2024 – May 2025 reporting period, and one was raised in the May 2024 – November 2024 reporting period. Of the six quarterly audit findings, five were raised in the November 2024 – May 2025 reporting period and one was raised in the May 2024 – November 2024 reporting period.

The Early Works Managing Contractor is responsible for compliance with the majority of EPRs listed below unless otherwise noted. SRLA is responsible for compliance with several EPRs, and some have been assessed as not applicable to Early Works or have not as yet been triggered by the works.

Audits of SRLA Managed Works were undertaken against all EPRs, except those related to Business, Electromagnetic Interference, Ground Movement, Groundwater and Sustainability, as these were determined not applicable to the scope of works. All EPRs applicable to SRLA Managed Works were found to be compliant and as such, have not been included in the discussion below.

3.2.1.1. Environmental Management

Four Environmental Management EPRs (EMF1-EMF4), the Environment Strategy, CEMP, WEMPs (across all locations visited) and Complaints Management System were audited in the reporting period and were deemed compliant with the exception of one Minor NC.

The Minor NC pertained to the Minor Revision Assessment form not being provided to the IEA, as is required in the Contractor's Environmental Strategy. The finding was closed during the reporting period to the satisfaction of the IEA.

3.2.1.2. Air Quality

Two Air Quality EPRs (AQ1 and AQ2) and the Environmental Air Quality and Dust Management Plan (EAQDMP) were audited in the reporting period and were deemed compliant.

3.2.1.3. Arboriculture

Two Arboriculture EPRs (AR2 and AR3) and the Tree Protection and Removal Plan (TPRP) were audited during the reporting period and deemed compliant with the exception of two Minor NCs.

The Minor NCs pertained to tree protection not being in accordance with the TPRPs. These findings were closed during the reporting period to the satisfaction of the IEA.

3.2.1.4. Contaminated Land

Two Contaminated Land EPRs (C4 and C8), the Hazardous Ground Gas Management Plan and the Human Health Risk Assessment – Stabling Facility were audited during the audit period and were deemed compliant with the exception of one Minor NC.

The Minor NC pertained to changes to the landfill gas monitoring bore network and the required reverification of the WEMP. The finding was closed during the reporting period to the satisfaction of the IEA.

3.2.1.5. Ecology

Four Ecology EPRs (EC1 – EC4) and the Ecology Management Sub-plan were audited during the reporting period and were deemed compliant.

3.2.1.6. Groundwater

Five Groundwater EPRs (GW1 – GW5) and the Groundwater Management Plan (GWMP) were audited during the reporting period and were deemed compliant with the exception of one Major NC.

The Major NC pertained to use of Revision 10 of the GWMP which did not appear to be informed by a numerical groundwater model. The finding was closed during the reporting period to the satisfaction of the IEA following reverification of the GWMP.

3.2.1.7. Land Use Planning

Three Land Use Planning EPRs (LUP2, LUP4 and LUP5), the Interim Land Use Guide, the Public Open Space Framework, and the Guide for Planning Permit Applications under SCO15 were audited during the reporting period and were deemed compliant.

3.2.1.8. Landscape and Visual

Five Landscape and Visual EPRs (LV1, LV3 – LV6), the Urban Design Strategy and the Urban Design and Landscape Plans were audited during the reporting period and were deemed compliant.

3.2.1.9. Noise and Vibration

Nine Noise and Vibration EPRs (NV1-NV8, NV11), the Construction Noise & Vibration Management Plan (CNVMP), Out of Hours Works (OOHW) Notifications, and the Residential Support Guidelines were audited during the reporting period and deemed compliant with the exception of one Minor NC.

The Minor NC pertained to an OOHW permit undergoing minor revision without signoff by original signatories to indicate acceptance of changes to the permit. This finding was closed during the reporting period to the satisfaction of the IEA.

3.2.1.10. Social and Community

Three Social and Community EPRs (SC2 – SC4), the Communications and Stakeholder Engagement Plans, and Public Open Space Framework (POSF) and Management Plans were audited during the reporting period and deemed compliant.

3.2.1.11. Surface Water

Three Surface Water EPRs (SW4, SW9 and SW10) and the Surface Water Management Plan were audited during the reporting period and deemed compliant.

3.2.1.12. Traffic and Transport

Five Traffic and Transport EPRs (TW1 – TW5), the Transport Management Plan and Worksite Traffic Management Plan (WTMP) extracts were audited during the reporting period and were deemed compliant.

3.2.2. Routine Environmental Performance Audits

During Routine Monthly Environmental Performance Audits, the IEA, through a process of document and record review, interviews and site observations, assessed the Contractors' compliance against the CEMP, site based WEMPs and associated sub-plans. During its audit program within the reporting period, the IEA identified twenty-one (21) audit findings against audit criteria, nineteen (19) of which were closed within the reporting period. Two findings remained open at the end of the reporting period. All twenty-one findings were rated as Low risk by the IEA.

3.2.3. Trends in Performance

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. One Major NC pertaining to Groundwater was raised during EMF and EPR Compliance (Quarterly) Audits in the reporting period. This was the first Major NC raised across all reporting periods and this finding was closed to the satisfaction of the IEA during the reporting period.

All the Routine Environmental Performance (Monthly) Audits findings identified during the reporting period were rated as Low Risk. Findings predominantly related to arboriculture (four findings), water and sediment (four findings), noise and vibration (three findings) and general environmental compliance (three findings). No findings were rated Medium or High risk during the reporting period, compared with seven Medium risk findings in the previous reporting period.

3.3. Early Works Corrective Actions

During the reporting period, the IEA made:

- One Quarterly EMF / EPR Major NC finding and five Quarterly EMF / EPR Minor NC finding, all of which were addressed by the Contractor (or SRLA where relevant) and evaluated by the IEA as being closed during the reporting period, and;
- Twenty-one Routine Monthly Environmental Performance Audit findings, nineteen of which were addressed by the Contractors and evaluated by the IEA as being closed within the reporting period.

As at the end of this reporting period:

- No Quarterly Audit findings remained open, and
- Two Routine Monthly findings remained open.

3.4. Early Works Conclusions

SRL East's Project compliance with the EMF, EPRs (as audited during the reporting period), CEMP and other relevant management plans has been evaluated. Both the Contractors and SRLA have addressed the requirements of the EMF and the requirement to deliver the project in general accordance with an EMS, through the ongoing preparation, implementation and updating of Project-specific environmental management plans (as specified within the EMF and its associated EPRs).

Overall, Project activities were found to be largely compliant with the EPRs against which construction activities were audited. The majority of audit findings across the Early Works audit program continue to be closed out to the satisfaction of the IEA as confirmed prior to, or during, the subsequent audit.

The IEA does not consider the audit findings have identified material risks of harm to the environment or human health. The IEA will continue to monitor Contractor progress in relation to corrective actions taken to address audit findings including the effectiveness of remedies, as well as trends in performance.

4. Tunnels South

4.1. Tunnels South Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in Table 5.1 of the EMF is subject to a process of review or verification and approval or acceptance. The IEA has continued its work in the review and verification of environmental documentation and management plans against the overarching Project environmental obligations and the EPRs as new stages of work have commenced. Further, the IEA has also reviewed any major revisions of previously verified documentation. The IEA during its review process considered the technical adequacy and effectiveness of actions proposed in the documentation.

In addition, the IEA monitors SRLA and Contractor compliance with approval conditions during its construction activities via a program of regular compliance audits. The following compliance audits were conducted during the reporting period:

- Two Quarterly Audits, undertaken in May and August 2025 (Auditee – Contractor)
- Six Monthly Audits (Auditee – Contractor)

Active construction sites visited during the reporting period, included Monash, Clayton, Clarinda Tunnel Boring Machine (TBM) Launch Facility, SSY West, and MetroMix (a site compound established for the project).

The scope of the Compliance Audits was determined and agreed by relevant stakeholders with a draft Audit Plan issued for comment prior to finalisation of the agreed scope. Compliance with the EPRs is being audited through a rolling 12-month EPR audit program, and higher risk EPRs can be audited more frequently if necessary.

Each Quarterly Audit assessed the compliance of the Contractors with the agreed EPRs, and applicable elements of the Environmental Strategy, the CEMP, Management Plans, and WEMPs.

Each Monthly Audit assessed the compliance of the Contractors with the WEMPs.

During the reporting period the IEA monitored Contractor progress to address audit findings.

4.2. Tunnels South Audit Findings

4.2.1. EPR Quarterly Compliance Audits

All applicable EPRs are audited over a twelve-month rolling audit cycle, with higher risk EPRs audited more frequently if required.

Forty-eight EPRs were directly audited in the reporting period, with at least one EPR from each EPR category included except for the Business and Electromagnetic Interference categories. These are outlined in Table 8 below and in Appendix B. The management plans required by the EPRs are separately audited.

Table 8. Tunnels South EPR audit findings

EPR Category	EPRs audited	Audit outcome
Environmental Management Framework	EMF1, EMF2, EMF4	Compliant
Aboriginal Cultural Heritage	ACH1	Compliant
Air Quality	AQ1, AQ2	Compliant
Arboriculture	AR2, AR3	Compliant
Contaminated Land	C1, C2, C3	Compliant
Ecology	EC2, EC4	Compliant
Ground Movement	GM1, GM2, GM3	Compliant
Groundwater	GW2, GW3, GW4, GW5	Compliant
Historical Heritage	HH5, HH6	Compliant
Land Use Planning	LUP1, LUP2	A Minor Non-compliance was raised against EPR LUP1. This was not considered a material risk to the environment or human health.
Landscape and Visual	LV4, LV5, LV7	Compliant
Noise and Vibration	NV1A, NV1, NV2, NV3, NV4, NV11	Compliant
Social and Community	SC2	Compliant
Surface Water	SW1, SW2, SW3, SW6, SW7	Compliant
Sustainability and Climate Change	SGG2, SGG3, SGG8, SGG9, SGG10	Compliant
Traffic and Transport	T1, T3, T4, T5	Compliant

The IEA found that all except one of the EPRs audited during this reporting period were considered compliant. A Minor Non-compliance was raised against EPR LUP1. This was not considered a material risk to the environment or human health.

Table 9. Tunnels South EPR audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	2	1	2	1
Totals	2	1	2	1

There were two EPR-related findings open from previous audits and two EPR findings were closed during the audit period.

4.2.2. Quarterly Environmental Strategy and CEMP audits

The Environmental Strategy and CEMP were audited twice during the reporting period. Four findings were raised against the requirements of the CEMP, including two Major Non-compliances. The Non-compliances related to documented environmental management arrangements not reflecting actual practice and are not considered a material risk to the environment or human health.

One finding was closed during the reporting period.

Table 10. Tunnels South Environmental Strategy and CEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	2	0	2
Minor Non-compliance	0	2	1	1
Totals	0	4	1	3

4.2.3. Quarterly Management Plan audits

The Management Plans required by the EMF were audited twice in the reporting period. Nine findings were raised, none of them considered to be Major Non-compliances. The findings were largely related to documented environmental management arrangements not reflecting actual practice and are not considered a material risk to the environment or human health.

Five findings were open at the start of the reporting period, and six findings were closed during the reporting period.

Table 11. Tunnels South Management Plans audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	5	9	6	8
Totals	5	9	6	8

4.2.4. Monthly Environmental Performance Audits

The IEA visits each active site monthly to assess conformance with the environmental controls defined in the WEMPs. Four audit findings were raised, none of them considered to be Major Non-compliances. The findings related to inadequate site environmental controls including surface water management, erosion and sediment control, mud on roads, and chemicals storage. Some minor findings were raised on the currency of the documented WEMPs.

Three findings were closed during the reporting period, and one remained open.

Table 12. Tunnels South WEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	4	3	1
Totals	0	4	3	1

4.2.5. Trends in Performance

At each audit the IEA reviews corrective actions undertaken by the Contractor, and their effectiveness. Where effective corrective actions have been implemented the audit finding is closed. The IEA recognises that some findings may take some time to close, particularly those related to revising environmental documentation.

The IEA has completed a review of audit findings raised and corrective actions being implemented during the reporting period. Two Major Non-compliances were raised during reporting period which related to implementation of the CEMP.

Surface Water requirements recorded the highest number of findings, followed by Contaminated Land, Traffic and Transport, Ecology, and Noise and Vibration. These were mainly attributed to the effectiveness of on ground controls, many with moderate or low risk to the environment.

The IEA recognises that the Contractor is progressively working through addressing findings and that efforts are underway to streamline the environmental documentation and improve the implementation and effectiveness of on-ground controls.

4.3. Tunnels South Corrective Actions

At each audit the IEA reviews corrective actions undertaken by the Contractor, and their effectiveness. Where effective corrective actions have been implemented the audit finding is closed. The IEA recognises that some findings may take some time to close, particularly those related to revising environmental documentation.

The number of findings raised and closed in the reporting period is given in the table below.

Table 13. Tunnels South corrective actions

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	2	0	2
Minor Non-compliance	7	16	12	11
Total	7	18	12	13

4.4. Tunnels South Conclusions

The Contractor for Tunnels South has developed the required environmental documentation required by the EMF. This documentation has been reviewed by SRLA and the IEA to assess conformance with the requirements of the EMF, including an assessment of technical adequacy. The implementation of the requirements of the verified documentation is assessed through quarterly management plan implementation audits and monthly environmental performance audits.

The construction program is in the early stages and the outcomes of the audits suggest that some processes are currently not yet mature and should develop as the project progresses. However, it was noted that efforts are underway to streamline the environmental documentation and improve the implementation and effectiveness of on-ground controls.

The IEA notes that none of the audit findings in the reporting period posed a material risk to the environment or to human health.

5. Tunnels North

5.1. Tunnels North Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in Table 5.1 of the EMF is subject to a process of review or verification and approval or acceptance. The IEA has continued its work in the review and verification of environmental documentation and management plans against the overarching Project environmental obligations and the EPRs as new stages of work have commenced. Further, the IEA has also reviewed any major revisions of previously verified documentation. The IEA during its review process considered the technical adequacy and effectiveness of actions proposed in the documentation.

In addition, the IEA monitors the Contractor compliance with approval conditions during its construction activities via a program of regular compliance audits. The following compliance audits were conducted during the reporting period:

- One Quarterly Audit (Auditees –Contractor), undertaken in September 2025
- Two Monthly Audits (Auditee – Contractor), which commenced in August 2025

Active construction sites visited during the reporting period included the Emergency Support Facility and Burwood.

The scope of the Compliance Audits was determined and agreed by relevant stakeholders with a draft Audit Plan issued for comment prior to finalisation of the agreed scope. The IEA sought input and verification from SRLA on the relevance of select EPRs to Tunnel and Civils scope. As a result, a number of EPRs remain out of scope, as all or key parts of these EPRs had not been triggered by Tunnel and Civils to that point, or they do not apply to Tunnel and Civils scope.

Each Quarterly Audit assessed the compliance of the Contractors with the agreed EPRs, and applicable elements of the Environmental Strategy, the CEMP, Management Plans, and WEMPs.

Each Monthly Audit assessed the compliance of the Contractors with the WEMPs.

During the reporting period the IEA monitored Contractor progress on addressing audit findings, noting that given that this reporting period was the first during which Tunnels North activities were audited by the IEA, there were no outstanding findings at the commencement of the reporting period.

5.2. Tunnels North Audit Findings

5.2.1. EPR Quarterly Compliance Audits

All applicable EPRs are audited over a twelve-month rolling audit cycle, with higher risk EPRs audited more frequently if required.

Twenty-two EPRs were directly audited in the reporting period, for the EPR categories shown in the table below (and in Appendix B). The management plans required by the EPRs are separately audited.

The IEA found that all the EPRs audited during this reporting period were considered compliant.

Table 14. Tunnels North EPR audit findings

EPR Category	EPRs audited	Audit outcome
Environmental Management Framework	EMF1, EMF4	Compliant
Air Quality	AQ1, AQ2	Compliant
Arboriculture	AR2, AR3	Compliant
Contaminated Land	C1, C2, C3	Compliant
Ecology	EC2, EC4	Compliant
Historical Heritage	HH6	Compliant
Landscape and Visual	LV5	Compliant
Noise and Vibration	NV1A, NV1, NV3, NV4, NV11	Compliant
Social and Community	SC2	Compliant
Surface Water	SW1, SW6	Compliant
Sustainability and Climate Change	SGG2	Compliant
Traffic and Transport	T1	Compliant

Table 15. Tunnels North EPR audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	0	0	0
Totals	0	0	0	0

5.2.2. Quarterly Environmental Strategy and CEMP audits

The Environmental Strategy and Construction Environmental Management Plan (CEMP) were audited once during the reporting period. Four findings were raised against the requirements of the CEMP, none of which were considered to be Major Non-compliances.

Three findings were closed during the reporting period.

Table 16. Tunnels North Environmental Strategy and CEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	4	3	1
Totals	0	4	3	1

5.2.3. Quarterly Management Plan audits

The Management Plans required by the EMF were audited once in the reporting period. One finding was raised. The was not considered to be a Major Non-compliance. The finding was related to documented environmental management arrangements not reflecting actual practice and is not considered a material risk to the environment or human health.

The finding remained were open at the end of the reporting period.

Table 17. Tunnels North Management Plan audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	1	0	1
Totals	0	1	0	1

5.2.4. Monthly Environmental Performance Audits

The IEA visits each active site monthly to assess conformance with the environmental controls defined in the WEMPs. One audit finding was raised. The finding was related to inadequate site environmental controls including dust, and mud on roads.

The finding remained open at the end of the reporting period.

Table 18. Tunnels North WEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	1	0	1
Totals	0	1	0	1

5.2.5. Trends in Performance

At each audit the IEA reviews corrective actions undertaken by the Contractor, and their effectiveness. Where effective corrective actions have been implemented the audit finding is closed. The IEA recognises that some findings may take some time to close, particularly those related to revising environmental documentation.

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. No Major NCs were raised during the reporting period. The IEA recognises that the Contractor is progressively working through addressing the remaining open findings.

Air Quality EPR requirements recorded the highest number of findings. These were mainly attributed to the effectiveness of on ground controls, many with moderate or low risk to the environment.

The IEA recognises that the Contractor is progressively working through addressing findings and that efforts are underway to streamline the environmental documentation and improve the implementation and effectiveness of on-ground controls.

5.3. Tunnels North Corrective Actions

The number of findings raised and closed in the reporting period is given in the table below.

Table 19. Tunnels North corrective actions

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	6	3	3
Total	0	6	3	3

5.4. Tunnels North Conclusions

The Contractor for Tunnels North has developed the required environmental documentation required by the EMF. This documentation has been reviewed by SRLA and the IEA to assess conformance with the requirements of the EMF, including an assessment of technical adequacy. The implementation of the requirements of the documentation is assessed through quarterly management plan implementation audits and monthly environmental performance audits.

The construction program is in the early stages and the outcomes of the audits suggest that some processes are currently not yet mature and should develop as the project progresses. However, it was noted that efforts are underway to streamline the environmental documentation and improve the implementation and effectiveness of on-ground controls.

The IEA notes that none of the audit findings in the reporting period posed a material risk to the environment or to human health.

Appendices

A. Early Works EMF/EPR Criteria audited during the reporting period

Table A1: EMF / EPR criteria audited during the reporting period

Topic	Criteria
EMF & EPRs	• EPRs EMF1 – EMF4 • Environmental Strategy • CEMP • WEMPs – across all locations visited • Complaints Management System
Aboriginal Cultural Heritage	• EPR ACH1
Air Quality	• EPRs AQ1 – AQ2 • Environmental Air Quality and Dust Management Plan • Environmental Air Quality Pollution and Dust Management Plan
Arboriculture	• EPRs AR1 – AR3 • Tree Protection and Removal Plans
Contaminated Land	• EPRs C1, C2, C4 and C8 • Hazardous Ground Gas Management Plan • Human Health Risk Assessment – Stabling Facility • Contaminated Land Management Plan • Contingency and Unexpected Finds Plan
Ecology	• EPRs EC1 – EC4 • Ecology Management Sub Plan • Flora and Fauna Plan • Tree Protection and Removal Plan
Historical Heritage	• EPR HH1, HH6 • Unexpected Finds Protocol
Groundwater	• EPRs GW1 – GW5 • Groundwater Management Plan
Land Use Planning	• EPRs LUP2, LUP3, LUP4, LUP5 • Interim Land Use Guide • Public Open Space Framework • Guide for Planning Permit Applications under SCO15 • WEMPs
Landscape and Visual	• EPRs LV1, LV3 – LV6 • Urban Design Strategy • Urban Design and Landscape Plans • CEMP
Noise and Vibration	• EPRs NV1 – NV8 and NV11 • Out of Hours Works (OOHW) Notifications • Construction Noise & Vibration Management Plans • Residential Support Guidelines • Out of Hours Work Permit(s)

Topic	Criteria
Social and Community	• EPRs SC2 – SC4 • Communications and Stakeholder Engagement Plans (CSEMP) • Public Open Space Framework and Management Plans
Surface Water	• EPRs SW1, SW2, SW4, SW9 and SW10 • Surface Water Management Plans • Flood Emergency Management Plan
Traffic and Transport	• EPRs T1 – T5 • Transport Management Plan • WTMP Extracts for Glen Waverley, Burwood and SSY • Traffic Management Plan(s)

Note: SRLA and the IEA have determined that the following EPRs had either not as yet been triggered or are not applicable to Early Works: EPRs C5, C7, EC5, EMI2, EMI3, GW6, LV2, LUP5, NV12 to NV14, NV17, NV18, SW8, SGG3 to SGG7, T7.

B. Tunnels South audit criteria audited during the reporting period

Table B1: EPRs audited during the reporting period

EPR Category	EPRs audited
Environmental Management Framework	EMF1, EMF2, EMF4
Aboriginal Cultural Heritage	ACH1
Air Quality	AQ1, AQ2
Arboriculture	AR2, AR3
Contaminated Land	C1, C2, C3
Ecology	EC2, EC4
Ground Movement	GM1, GM2, GM3
Groundwater	GW2, GW3, GW4, GW5
Historical Heritage	HH5, HH6
Land Use Planning	LUP1, LUP2
Landscape and Visual	LV4, LV5, LV7
Noise and Vibration	NV1A, NV1, NV2, NV3, NV4, NV11
Social and Community	SC2
Surface Water	SW1, SW2, SW3, SW6, SW7
Sustainability and Climate Change	SGG2, SGG3, SGG8, SGG9, SGG10
Traffic and Transport	T1, T3, T4, T5

Table B2: Tunnels South Management Plans audited during the reporting period

SRL East Tunnels South Environmental Strategy

- Selected key applicable elements from the Environmental Strategy

Construction Environmental Management Plan

- Selected key applicable elements from the CEMP

CEMP Sub-plans and EPR Management Plans

Elements of the following CEMP Sub-plans and EPR Plans applicable to the works undertaken in the reporting period:

- Business Disruption Management Plan
- Communication & Stakeholder Engagement Plan (Rev 0)
 - Communications and Stakeholder Engagement Plan (including Business Disruption Mitigation Plan) – Clayton
 - Communications and Stakeholder Engagement Plan (including Business Disruption Mitigation Plan) – SSY West and Alex Fraser
- Construction Noise and Vibration Management Plan
- Contaminated Land Management Plan
- Environmental Air Quality and Dust Management Plan
- Flood Emergency Management Plan - Alex Fraser
- Flood Emergency Management Plan - Clayton
- Flood Emergency Management Plan – SSY West
- Flora, Fauna, Weeds and Pest Management Plan
- Ground Movement and Monitoring Plan - Surface Excavation
- Groundwater Management and Monitoring Plan
- Hazardous Ground Gases Management Plan
- Heritage and Archaeological Management Plan
- Hazardous Materials Management Plan
- PASS and Rock Management Plan
- Spoil Management Plan
- Surface Water Management Plan (incl. Water Quality Monitoring Program)
- Sustainability Management Plan
- Transport Management Plan (Rev 0)
 - Construction Parking Management Plan - Clayton
 - Construction Parking Management Plan - SSY West & Alex Fraser
- Tree Protection and Removal Management Plan
- Wastewater Discharge Management Plan (Alex Fraser)
- Wastewater Discharge Management Plan (Clayton)
- Wastewater Discharge Management Plan (SSY West)

Note that the SEMP's were assessed as part of the audit of the associated CEMP sub-plans and EPR plans for the novated EPRs, and as per the process for novated EPRs outlined in the SC Environmental Strategy. Implementation of environmental controls in the SEMP's were assessed as part of the WEMP audits.

Worksite Environmental Management Plans

Relevant elements from:

- WEMP Plan Alex Fraser
- WEMP Clayton
- WEMP SSY West

C. Tunnels North audit criteria audited during the reporting period

Table C1: EPRs audited during the reporting period

EPR Category	EPRs audited
Environmental Management Framework	EMF1, EMF4
Air Quality	AQ1, AQ2
Arboriculture	AR2, AR3
Contaminated Land	C1, C2, C3
Ecology	EC2, EC4
Historical heritage	HH6
Landscape and visual	LV5
Noise and Vibration	NV1, NV3, NV4, NV11
Social and community	SC2
Surface Water	SW1, SW6
Sustainability and Greenhouse gas	SGG2
Traffic and transport	T1

Table C2: Tunnels North Management Plans audited during the reporting period

SRL East Terra Verde Environmental Strategy

Key applicable elements from the Environmental Strategy

Construction Environmental Management Plan

Key applicable elements from the CEMP

CEMP Sub-plans and EPR Management Plans

Elements of the following CEMP Sub-plans and EPR Plans applicable to the works undertaken in the reporting period:

- Communications and Stakeholder Engagement Plan
- Construction Noise and Vibration management Plan

- Construction Parking Management Plan
- Contaminated Land Management Plan
- Environmental Air Quality and Dust Management Plan
- Flood Emergency Management Plan
- Flora and Fauna Management Plan
- Spoil Management Plan
- Surface water Management Plan
- Sustainability Management Plan
- Transport Management Plan
- Tree Removal and Protection Plan

Worksite Environmental Management Plans

Relevant elements from:

- WEMP ESF Phase 1

D. Statement of Limitations and Disclaimer

The IEA and SRLA have prepared this Report for the purposes set out in section 1.2.

The contents of this Report and any related audit findings described in this Report reflect industry practice based on information available to SRLA and the IEA as at the date of this Report and the scope of services, methodologies, and resources to which the audit activities and audit findings relate. The IEA relied on information provided by SRLA and its Contractor(s) in performing the audit activities and, except as expressly provided, has not carried out any separate verification of such information provided.

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