



**SUBURBAN
RAIL LOOP**

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

November 2024 – May 2025

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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
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	The evidence demonstrates that the criteria has been partially met and at present does not fully meet the relevant project environmental obligations.
Major non-compliance	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.
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> .
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 and Civils (South)	The segment of Main Works that is being delivered from Cheltenham to Glen Waverley, by Suburban Connect (Contractor engaged by SRLA).

1. Introduction

1.1. Role of the IEA

Nation Partners Pty Ltd (Nation Partners) is an Independent Environmental Auditor (IEA) for 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

This IEA Summary Report (Report) presents the IEA audit activities and audit findings from the fourth six-month period of Early Works and first six-month period of Tunnel and Civils (South) construction of the Suburban Rail Loop (SRL) East Project (the Project). The Report has been prepared by the IEA and SRLA to provide specific detail relevant to the audit program for the reporting period of 11 November 2024 to 10 May 2025 (the 'reporting period') and addresses the requirements under Section 6.2.1 of the EMF.

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 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, as follows:
 - **Section 3.1:** Early Works Audit Activities – details the scope of the IEA's audit activities undertaken prior to, during and after each audit, and identifies the audits completed during the reporting period.
 - **Section 3.2:** Early Works Audit Findings – summarises the IEA's findings from compliance audits against the EMF/ EPRs
 - **Section 3.3:** Early Works Corrective Actions – provides a status summary of actions taken to address audit findings
 - **Section 3.4:** Early Works Audit Conclusion – includes a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs
- Section 4 – summarises the key audits details and outcomes relevant to the Tunnels and Civils (South) contract, as follows:
 - **Section 4.1:** Tunnel and Civils (South) Audit Activities – details the scope of the IEA's audit activities undertaken prior to, during and after each audit, and identifies the audits completed during the reporting period.
 - **Section 4.2:** Tunnel and Civils (South) Audit Findings – summarises the IEA's findings from compliance audits against the EMF / EPRs
 - **Section 4.3:** Tunnel and Civils (South) Corrective Actions – provides a status summary of actions taken to address audit findings
 - **Section 4.4:** Tunnel and Civils (South) Audit Conclusion – includes 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 and Civils South Contractor
 - **Appendix C** – 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	<p>Quarterly.</p> <p>Early Works construction commenced in May 2023, and audit activities commenced three months post the commencement of construction (August 2023).</p> <p>Tunnels and Civils (South) construction commenced in November 2024, and audit activities commenced three months post the commencement of construction (February 2025).</p>
Locations	Desktop and project sites (risk based)
Scope	<p>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.</p> <p>Compliance with every applicable EPR to be audited annually. High-risk activities to be audited more frequently.</p>
Inputs	<p>Observations of project activities</p> <p>Interviews with Contractor / subcontractor, and SRLA personnel</p> <p>Review of documents and records</p>
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 CEMP, WEMP, and associated documents 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	<p>Monthly, starting 6 months from commencement of project works.</p> <p>Early Works construction commenced in May 2023, and routine monthly environmental performance audits commenced in November 2023.</p> <p>Tunnels and Civils (South) construction commenced in November 2024. Routine monthly environmental performance audits also commenced in November 2024.</p>
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	<p>Observations of project activities</p> <p>Interviews with contractor / subcontractor.</p> <p>Review of documents and records, including:</p> <ul style="list-style-type: none"> ▪ 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 EMF, EPRs, Environmental Strategy, UDLPs, CEMP.
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. Table 5 describes the audit outcome classifications utilised for Quarterly audits, and Table 6 describes the outcome risk rating classifications utilised for Monthly audits.

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.

2.5. 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 EMF Table 5.1 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 for Early Works:

- Quarterly Audits¹ (Auditees - SRLA and Contractor)
 - Quarterly Audit #6: November 2024
 - Quarterly Audit #7: February 2025
- Monthly Audits (Auditee - Contractor)
 - Monthly Audit #13: November 2024
 - Monthly Audit #14: December 2024
 - Monthly Audit #15: January 2025
 - Monthly Audit #16: February 2025
 - Monthly Audit #17: March 2025
 - Monthly Audit #18: April 2025

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

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 relevancy 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 they 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 eight Monthly audit findings, and 14 Quarterly audit findings considered 'open' that were raised during prior reporting periods². Of these, seven Monthly audit findings and 14 Quarterly Audit findings were closed during this reporting period.

¹ Scope periodically includes Contractor EMS

² Of the eight monthly findings, seven were raised in the May 2024 – November 2024 reporting period and one was raised in the November 2023 – May 2024 reporting period. Of the fourteen quarterly audit findings, ten were raised in the May 2024 – November 2024 reporting period, and four were raised during the November 2023 – May 2024 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 59 EPRs audited during this reporting period were considered compliant. Six Minor Non-compliances (Minor NC) were raised, of which three were closed during the reporting period. The IEA did not consider the open findings to pose an unacceptable risk to human health or the environment. The following sub-sections summarise the audit findings.

The Early Works Managing Contractor (Laing O'Rourke Construction Australia Pty Ltd (LOR)) 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.

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 two Minor NCs.

The Minor NCs pertained to the Environmental Risk and Opportunity Register (EROR) and issue of the Worksite Traffic Management Plan (WTMP) Extract. The EROR finding was closed during the reporting period to the satisfaction of the IEA, the WTMP finding remained open at the end of the reporting period.

3.2.1.2. Aboriginal cultural heritage

One EPR (ACH1) and the Cultural Heritage Management Plan (CHMP) were audited during the reporting period and were deemed compliant.

3.2.1.3. Arboriculture

Four EPRs (AR1-AR4), the Spatial Tree Inventory Database, Tree Protection and Removal Plan (TPRP) and the Tree Canopy Replacement Plan were audited during the reporting period and deemed compliant with the exception of one Minor NC pertaining to the Tree Protection and Removal Plan for Glen Waverley. This finding was closed during the reporting period to the satisfaction of the IEA.

3.2.1.4. Business

Seven EPRs (B1-B4, B6, B8, B9), Business Disruption Mitigations Plans and the Business Disruption Mitigation Framework were audited during the reporting period and were deemed compliant.

3.2.1.5. Contaminated Land

Four EPRs (C1-C3, C6), the CEMP and the Soil, Contaminated Land, and Acid Sulfate Management Plans were audited during the audit period and were deemed compliant.

3.2.1.6. Ground Movement

Three EPRs (GM1-GM3) and Ground Movement Plans were audited during the reporting period and were deemed compliant.

3.2.1.7. Historical Heritage

Eight EPRs (HH1-HH6, HH8, HH9), the CEMP, Historic Heritage Sub-plan, Archaeological Management Plans and the Heritage Interpretation Strategy were audited during the reporting period and were deemed compliant.

3.2.1.8. Land Use Planning

Two EPRs (LUP1, LUP3) and the Land Use Interface Plans were audited during the audit period and were deemed compliant.

3.2.1.9. Noise and Vibration

Nine EPRs (NV1-NV8, NV11), the Construction Noise & Vibration Management Plan, Out of Hours Works Notifications, and the Residential Support Guidelines were audited during the reporting period and deemed compliant with the exception of one Minor NC pertaining to hoarding at Glen Waverley. The finding remained open at the end of the reporting period.

3.2.1.10. Social and Community

Seven EPRs (SC1-SC7), the Communications and Stakeholder Management Framework, Communications and Stakeholder Engagement Plans, Public Open Space Framework (POSF) and Management Plans, Relocation Support, and Voluntary Residential Property Purchase Scheme were audited during the reporting period and deemed compliant.

3.2.1.11. Surface Water

Five EPRs (SW1-SW3, SW6, SW7) and the Surface Water Management Plan were audited during the reporting period and deemed compliant with the exception of two Minor NCs pertaining to reporting exceedances from water quality monitoring and calibration of the water monitoring devices. The calibration finding was closed during the reporting period to the satisfaction of the IEA, the monitoring finding remained open at the end of the reporting period.

3.2.1.12. Sustainability and Greenhouse Gas

Five EPRs (SGG1, SSG2, SSG8-SSG10) and the Sustainability Management Plan 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 Contractor's compliance against the CEMP, site based WEMPs and associated sub-plans. During its audit program within the reporting period, the IEA identified 37 (thirty-seven) audit findings against audit criteria, 26 (twenty-six) of which were closed within the reporting period. Eleven findings remained open at the end of the reporting period.

Findings were rated as Low, Medium or High risk as defined in Table 6. Thirty findings were rated as Low risk by the IEA, with 7 (seven) findings rated as Medium risk by the IEA (three Cultural & Historical Heritage, three Contaminated Land and Stockpile Management, and one Arboriculture and Ecology). There were no findings rated as High 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. No Major NCs were raised during EMF and EPR Compliance (Quarterly) Audits in the reporting period, which continues the trend of no Major NCs having been identified by the IEA during the audit program during this, or prior reporting periods.

A majority of Routine Environmental Performance (Monthly) Audits findings identified during the reporting period were rated as Low Risk (thirty of thirty-seven findings). Findings (across all risk ratings) predominantly related to Noise, Vibration and Lighting (nine findings), management of Hazardous substances (eight findings) and general environmental compliance (six findings). No findings were rated High risk during the reporting period, compared with one High risk finding in the previous reporting period.

3.3. Early Works Corrective Actions

During the reporting period, the IEA made:

- Six Quarterly EMF / EPR Minor NC findings, three of which were addressed by the Contractor (or SRLA where relevant) and evaluated by the IEA as being closed during the reporting period, and
- Thirty-seven Routine Monthly Environmental Performance Audit findings, twenty-six of which were addressed by the Contractor and evaluated by the IEA as being closed within the reporting period.

As at the end of this reporting period:

- Three Quarterly Audit Minor NC findings remained open, and
- Eleven 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 Contractor 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 59 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. Tunnel and Civils - South

4.1. Tunnel and Civils (South) Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in EMF Table 5.1 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:

- Quarterly Audits (Auditees – SRLA and Contractor)
 - Quarterly Audit #1: February 2025
- Monthly Audits (Auditee – Contractor)³
 - Monthly Audit #1: November 2024
 - Monthly Audit #2: January 2025
 - Monthly Audit #3: February 2025
 - Monthly Audit #4: March 2025
 - Monthly Audit #5: April 2025

Active construction sites visited during the reporting period, included Clayton, Clarinda Tunnel Boring Machine (TBM) Launch Facility, Southern Stabling Yard (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. The IEA sought input and verification from SRLA on the relevancy 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 (refer to Table B-1).

During the reporting period, the IEA monitored SRLA and Contractor progress to address audit findings, noting this was the first reporting period of the Tunnel and Civils (South) construction scope.

³ No monthly audit was undertaken in December 2024 as there were no active works.

4.2. Tunnel and Civils (South) Audit Findings

4.2.1. EMF and EPR Quarterly Compliance Audits

The IEA found that the majority of the 29 EPRs audited during this reporting period were considered compliant. Ten (10) Minor Non-compliances (Minor NC) were raised, for which corrective action processes were ongoing at the end of this reporting period. The IEA did not consider the open findings to pose an unacceptable risk to human health or the environment. The following sub-sections summarise the audit findings.

The Tunnel and Civils Contractor (Suburban Connect) 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 Tunnel and Civils or have not as yet been triggered by the works.

4.2.1.1. Environmental Management

Four Environmental Management EPRs (EMF1-EMF4), the Environment Strategy, CEMP, Site Environmental Management Plans (SEMPs)/WEMPs and Complaints Management System were audited and were deemed compliant with the exception of two Minor NCs pertaining to the implementation of the complaints management system and the minor change process.

4.2.1.2. Aboriginal Cultural Heritage

One EPR (ACH1) and the CHMP were audited and deemed compliant, with the exception of two Minor NCs pertaining to the provision to the IEA of the current version of CHMP 18258 and CHMP induction records.

4.2.1.3. Air Quality

Two EPRs (AQ1 and AQ2) and the EAQDMP were audited and deemed compliant, with the exception of one Minor NC pertaining to dust suppression during asbestos removal.

4.2.1.4. Arboriculture

Four EPRs (AR1-AR4), the TPRP and the Tree Canopy Replacement Plan were audited and deemed compliant with the exception of two Minor NCs. The Minor NCs were pertaining to the spatial tree inventory database not yet including the attribution of trees removed by others, and gaps in compliance with the tree removal feedback loop between SRLA and Suburban Connect.

4.2.1.5. Contaminated Land

Three EPRs (C2-C4), the Contaminated Land Management Plan, Spoil Management Plan and Hazardous Ground Gases Management Plan were audited and were deemed compliant.

4.2.1.6. Ecology

Three EPRs (EC1, EC2, EC4) and the Flora, Fauna, Weeds and Pest Management Plan were audited and were deemed compliant.

4.2.1.7. Noise and Vibration

Nine EPRs (NV1-NV8, NV11), the Construction Noise & Vibration Management Plan (CNVMP), OOHV Notifications and Residential Support Guidelines were audited and deemed compliant with the exception of three Minor NCs. The Minor NCs were pertaining to the modelled use of plant and equipment prior to works, as compared to actual activities undertaken, and the adoption of identified reasonably practicable noise mitigation at worksites.

4.2.1.8. Surface Water

Three EPRs (SW1, SW6, SW7), the Surface Water Management Plan and Wastewater Discharge Management Plan for each site visited (i.e. Clayton, Clarinda TBM Launch Facility and SSY West) were audited and were deemed compliant.

4.2.2. 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 Contractor's compliance against the CEMP, site based WEMPs and associated sub-plans. During its audit program within the reporting period, the IEA identified 12 audit findings against audit criteria, four of which were closed within the reporting period. Eight findings remained open at the end of the reporting period.

Findings were rated as Low, Medium or High risk as defined in Table 6. Ten findings were raised as Low risk by the IEA, with 2 (two) findings rated as Medium risk (pertaining to Noise, Vibration & Lighting). No High risk findings were raised during the reporting period.

One Medium risk finding (pertaining to Noise Vibration & Lighting) and seven Low risk findings (two Noise, Vibration & Lighting, two Hazardous Substances, one Contaminated Land, one Water and Sediment and one General) remained open at the end of the reporting period and were not considered by the IEA to represent a material risk to human health or the environment.

4.2.3. Trends in Performance

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. No Major NCs were raised during EMF and EPR Compliance (Quarterly) Audits in the reporting period. The IEA recognises that the Contractor and SRLA are progressively working through addressing the remaining open findings.

Noise and Vibration EPR requirements as a category recorded the highest number of findings, with three findings attributed to this EPR category, while other categories had none, one or two findings.

Routine Environmental Performance (Monthly) Audits identified two Medium risk findings in the reporting period, which were both attributed to Noise, Vibration and Lighting. The remainder of the findings were rated as Low risk, and no High-risk findings were identified.

4.3. Tunnel and Civils (South) Corrective Actions

During the reporting period, the IEA made:

- Ten Quarterly EMF / EPR Minor NC findings, all of which remained open at the completion of the reporting period.
- Twelve Routine Monthly Environmental Performance Audit findings, four of which were addressed by the contractor and evaluated by the IEA as being closed during the reporting period. Eight findings remained open at the completion of the reporting period.

4.4. Tunnel and Civils (South) 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 Contractor 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 EMFs and its associated EPRs).

Overall, Project activities were found to be largely compliant with the 29 EPRs against which construction activities were audited. The majority of audit findings across the Tunnel and Civils (South) 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.

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	<ul style="list-style-type: none"> • EPRs EMF1 – EMF4 • Environmental Strategy • CEMP • WEMPs – across all locations visited • Complaints Management System
Aboriginal Cultural Heritage	<ul style="list-style-type: none"> • EPR ACH1 • Cultural Heritage Management Plan
Arboriculture	<ul style="list-style-type: none"> • EPRs AR1 – AR4 • Spatial Tree Inventory Database • Tree Protection and Removal Plan (TPRP)
Business	<ul style="list-style-type: none"> • EPRs B1 – B4, B6, B8 and B9 • Business Disruption Mitigation Plans (BDMPs) • Business Disruption Mitigation Framework (BDMF)
Contaminated Land	<ul style="list-style-type: none"> • EPRs C1 – C3 and C6 • CEMP • Spoil, Contaminated Land and Acid Sulfate Soil Management Plan
Ground Movement	<ul style="list-style-type: none"> • EPRs GM1 – GM3 • Ground Movement Plans
Historical Heritage	<ul style="list-style-type: none"> • EPR HH1 – HH6, HH8 and HH9(2) • CEMP Historic Heritage Sub-plan • Archaeological Management Plans • Heritage Interpretation Strategy
Land Use Planning	<ul style="list-style-type: none"> • EPRs LUP1 and LUP3 • Land Use Interface Plans (for locations visited)
Noise and Vibration	<ul style="list-style-type: none"> • EPRs NV1 – NV8 and NV11 • Out of Hours Works (OOHW) Notifications • Construction Noise & Vibration Management Plan (CNVMP) • Residential Support Guidelines
Social and Community	<ul style="list-style-type: none"> • EPRs SC3 – SC7 • Communications and Stakeholder Engagement Management Framework • Communications and Stakeholder Engagement Plan (CSEMP) • Public Open Space Framework (POSF) and Management Plans • Relocation Support • Voluntary residential property purchase scheme
Surface Water	<ul style="list-style-type: none"> • EPRs SW1 – SW3, SW6 and SW7 • Surface Water Management Plan
Sustainability and Greenhouse Gas	<ul style="list-style-type: none"> • EPRs SGG1, SGG2, SGG8 – SGG10

- Sustainability Management Plan

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. Tunnel and Civils (South) EMF/EPR Criteria Audited During the Reporting Period

Table B1: EMF / EPR criteria audited during the reporting period

Topic	Criteria
EMF & EPRs	<ul style="list-style-type: none"> • EPRs EMF1 – EMF4 • Environmental Strategy • CEMP • WEMPs – across all locations visited • Complaints Management System
Aboriginal Cultural Heritage	<ul style="list-style-type: none"> • EPR ACH1 • Cultural Heritage Management Plan (CHMP)
Air Quality	<ul style="list-style-type: none"> • EPRs AQ1 – AQ2 • Environmental Air Pollution & Dust Monitoring Plan (EAPDMP)
Arboriculture	<ul style="list-style-type: none"> • EPR AR1 – A4 • Tree Protection and Removal Plan (TPRP)
Contaminated Land	<ul style="list-style-type: none"> • EPRs C2, C3 and C4 • Contaminated Land Management Plan • Spoil Management Plan • Hazardous Ground Gases Management Plan
Ecology	<ul style="list-style-type: none"> • EPRs EC1, EC2 and EC4 • Flora, Fauna, Weeds and Pest Management Plan
Noise and Vibration	<ul style="list-style-type: none"> • EPRs NV1 – NV8 and NV11 • Out of Hours Works (OOHW) Notifications • Construction Noise & Vibration Management Plan (CNVMP) • Residential Support Guidelines
Surface Water	<ul style="list-style-type: none"> • EPRs SW1, SW6 and SW7 • Surface Water Management Plan • Wastewater Discharge Management Plan (Clayton) • Wastewater Discharge Management Plan (Clarinda TBM Launch) • Wastewater Discharge Management Plan (SSY West)

Note: SRLA and the IEA have determined that the following EPRs had either not as yet been triggered or are not applicable to Tunnel and Civils (South), relevant to Suburban Connect: EPRs EMF3, AR4, B5 to B9, C5, C7, EC3, EMI3, GW6, HH7, LUP2, LUP4, LUP5, LV1 to LV3, LV6, NV12 to NV14, NV17, NV18, SC1, SC3, SC5 to SC7, SW8, SGG1, SGG4 to SGG7, T7, T8.

C. Statement of Limitations and Disclaimer

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

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