



EPBC Act 1999 Approval Independent Audit

Level Crossing Removal Project (LXRP) – Edithvale and Bonbeach Level Crossing Removal Environmental Audit 2 Report

17 July 2024



Inherent Limitations

This document has been prepared at the request of the Level Crossing Removal Project (LXRP) in accordance with the terms of KPMG's engagement contract with LXRP dated 27 November 2023. The services provided in connection with this engagement comprise an advisory engagement and were performed in accordance with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019. The services provided are not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board, and consequently, no opinions or conclusions intended to convey assurance have been expressed.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, the Level Crossing Removal Project (LXRP); the AECOM GHD Plus (AGP) Joint Venture (LXRP's technical advisor); and Southern Program Alliance (SPA) (LXRP delivery partner), consulted as part of the process. KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

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

Internal Control Structure

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

Third Party Reliance

This report is solely for the purpose set out in the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019 and for information for the Level Crossing Removal Project and Department of Climate Change, Energy, the Environment and Water (DCCEEW), and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This report has been prepared at the request of the Level Crossing Removal Project in accordance with the terms of KPMG's engagement contract dated 27 November 2023. Other than our responsibility to the Level Crossing Removal Project, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this Audit Criteria and Methodology. Any reliance placed is that party's sole responsibility.

Electronic Distribution

KPMG accepts no liability for and has not undertaken work in respect of any event after the date of the report which may affect findings in the report. Responsibility for the security of any electronic distribution of this report remains the responsibility of Level Crossing Removal Project and must be done so in accordance with the terms agreed between Level Crossing Removal Project and KPMG. KPMG accepts no liability if the report is or has been altered in any way by any person.

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Executive Summary

The Level Crossing Removal Project (LXRP), as a part of the Victorian Infrastructure Delivery Authority (VIDA), is a government entity responsible for eliminating 110 dangerous and congested level crossings across metropolitan Melbourne.

LXRP was granted approval under the provisions of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* for an approved action involving the removal of two-level crossings at Edithvale Road, Edithvale and Station Street/Bondi Road, Bonbeach, Victoria. In accordance with Condition 16 of the *EPBC Act Approval*, LXRP was required to engage an Independent Auditor (IA) to undertake an independent audit of compliance with the conditions of the *EPBC Act Approval* for the 24-month period after the commencement of the level crossing removal construction activities ('the action'). This 24-month period is October 2021 – October 2023. An independent audit of compliance with the conditions of the *EPBC Act Approval* was undertaken by an IA for the 12-month period after the commencement of the action from October 2020 – October 2021.

The scope of the IA services was to assess activities associated with the removal of two-level crossings at Edithvale and Bonbeach, Victoria, against the conditions of the *EPBC Act Approval* held by LXRP and provide an Independent Audit Report to the Department of Climate Change, Energy, the Environment and Water (the Department).

The IA services were conducted and carried out in accordance with the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019* (the Guidelines).

Based on the documentation assessed for the period October 2021 – October 2023 and the stakeholder interview dated 11 June 2024, the following findings were identified: fifty-three Approval criteria were found to be 'Compliant', two (2) 'non-Compliant', thirty-one 'Non-Applicable' and two (2) 'To Be Determined' resulting from the 25 conditions within the Approval. The audit rating criteria adopted ('Non-Compliant', 'Non-Applicable', 'Compliant' and 'Observations') was derived from the Guidelines. The full compliance criteria and corresponding criteria descriptions are provided in **Appendix A**. An additional observation has been noted in Section 5.1 with regards to incorrect classification of a finding from the previous audit (Audit 1).

A summary of the 'Compliant' and 'Non-Compliant' findings for the corresponding *EPBC Act Approval* Condition is provided in **Table 1**. The detailed audit findings are contained in **Appendix E**.

Independent data quality validation (specifically for groundwater quality monitoring data) was not part of the IA's scope of work. Therefore, the IA has relied solely on data and documentation provided by LXRP to assess the compliance status with relevant conditions.

Table E.1 - Summary of Compliance Outcome against each EPBC Act Approval Condition

EPBC Act Approval Criteria Number	EPBC Act Approval Criteria Name	Compliance Status
1.1	Minister approval of Groundwater Monitoring and Management Plan (GMMP)	Compliant
2.1	Commencement of the Action	Compliant
2.2	Implementation of the approved GMMP	Compliant

EPBC Act Approval Criteria Number	EPBC Act Approval Criteria Name	Compliance Status
3.1	Consistency with approved Environmental Performance Requirements (EPR)	Compliant
3.2	Inclusion of environmental objectives within the GMMP	Compliant
3.3	Inclusion of relevant <i>EPBC Act</i> protected matter/s within the GMMP	Compliant
3.4	Inclusion of a table addressing applicable <i>EPBC Act</i> approval conditions within the GMMP	Compliant
3.5	Inclusion of a table outlining commitments made to achieve objectives within the GMMP	Compliant
3.6	Inclusion of reporting mechanisms to demonstrate compliance within the GMMP	Compliant
3.7	Inclusion of review mechanisms to demonstrate compliance within the GMMP	Compliant
3.8	Inclusion of documentation standards to demonstrate compliance within the GMMP	Compliant
3.9	Inclusion of a risk assessment assessing the achievability of environmental objectives within the GMMP	Compliant
3.10	Inclusion of risk management strategies to address the risk assessment within the GMMP	Compliant
3.11	Inclusion of impact avoidance measures and their timing within the GMMP	Compliant
3.12	Inclusion of mitigation and/or repair measures and their timings within the GMMP	Compliant
3.13	Inclusion of a monitoring program within the GMMP	Compliant
3.14	Inclusion of measurable performance indicators within the monitoring program in the GMMP	Compliant
3.15	Inclusion of timing and frequency for monitoring against the performance indicators within the monitoring program in the GMMP	Compliant
3.16	Inclusion of trigger values for corrective actions within the monitoring program in the GMMP	Compliant
3.17	Inclusion of corrective actions, and commitments where trigger values are reached within the monitoring program in the GMMP	Compliant
4.1	Minister approval of the Edithvale Wetlands Monitoring and Mitigation Plan (EWMMP)	Compliant
5.1	Commencement of the Action	Compliant
5.2	Implementation of the approved EWMMP	Compliant

EPBC Act Approval Criteria Number	EPBC Act Approval Criteria Name	Compliance Status
6.1	Consistency with approved EPR	Compliant
6.2	Inclusion of environmental objectives within the EWMMP	Compliant
6.3	Inclusion of relevant <i>EPBC Act</i> protected matter/s within the EWMMP	Compliant
6.4	Inclusion of a table addressing applicable <i>EPBC Act</i> approval conditions within the EWMMP	Compliant
6.5	Inclusion of a table outlining commitments made to achieve objectives within the EWMMP	Compliant
6.6	Inclusion of reporting mechanisms to demonstrate compliance within the EWMMP	Compliant
6.7	Inclusion of review mechanisms to demonstrate compliance within the EWMMP	Compliant
6.8	Inclusion of documentation standards to demonstrate compliance within the EWMMP	Compliant
6.9	Inclusion of a risk assessment assessing the achievability of environmental objectives within the EWMMP	Compliant
6.10	Inclusion of risk management strategies to address the risk assessment within the EWMMP	Compliant
6.11	Inclusion of impact avoidance measures and their timing within the EWMMP	Compliant
6.12	Inclusion of mitigation and/or repair measures and their timings within the EWMMP	Compliant
6.13	Inclusion of a monitoring program within the EWMMP	Compliant
6.14	Inclusion of measurable performance indicators within the monitoring program in the EWMMP	Compliant
6.15	Inclusion of timing and frequency for monitoring against the performance indicators within the monitoring program in the EWMMP	Compliant
6.16	Inclusion of trigger values for corrective actions within the monitoring program in the EWMMP	Compliant
6.17	Inclusion of corrective actions, and commitments where trigger values are reached within the monitoring program in the EWMMP	Compliant
7.1	Notification of the commencement of action to the Department	Compliant
8.1	Minister approval of action commencement where 5 years after the date of the approval	Compliant
9.1	Maintenance of compliance records	Compliant

EPBC Act Approval Criteria Number	EPBC Act Approval Criteria Name	Compliance Status
11.1	Electronic submission of plans for Minister's approval	Compliant
11.2	Publication of plans within the approved timeframe	Compliant
11.4	Maintaining publication of approved plans	Compliant
12.1	Preparation of relevant data in accordance with the Department's Guidelines	Compliant
13.1	Preparation of a compliance report every 12-month period following action commencement date	Compliant
13.2	Publication of prepared compliance reports within 60 business days following the relevant 12-month period	Non-Compliant - Whilst the IA observed publication of each compliance report on the website, it was identified Annual Compliance Report No. 2 was published 65 business days following the date the report was prepared.
13.3	Email notification to the Department of compliance report publication within five (5) business days of the date of publication	Non-Compliant - Notification to the Department that the Annual Compliance Report No. 2 was published on the website occurred 54 business days after publication.
13.4	Maintaining publication of compliance reports on website until 1 November 2033	Compliant
16.1	Independent Audits undertaken for compliance with the conditions	Compliant
17.1	Notification of the independent auditor to the Department	Compliant
17.2	Notification of the draft audit criteria to the Department	Compliant
17.3	Commencement of the audit within the approved timeframe	Compliant
17.4	Submission of the audit report within the approved timeframe	Compliant
18.1	Publication of the approved audit report within the specified timeframe by the Department	Compliant

1. Introduction

1.1 Background

The Level Crossing Removal Project (LXRP), which forms part of the Victorian Infrastructure Delivery Authority (VIDA), is a government entity responsible for overseeing the elimination of 110 dangerous and congested level crossings across metropolitan Melbourne by 2030, in addition to other rail network upgrades such as new train stations, track duplication and train stabling yards.

LXRP was granted approval under the provisions of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for an approved action involving the removal of two-level crossings at Edithvale Road, Edithvale and Station Street/Bondi Road, Bonbeach, Victoria (EPBC Approval 2017/7906 dated 3 December 2018). While LXRP holds the *EPBC Act* Approval, the work required to remove the two-level crossings was undertaken by LXRP's delivery partner, the Southern Program Alliance (SPA). SPA comprises Metro Trains Melbourne Pty Ltd (MTM), WSP Australia Pty Ltd (WSP) and the Acciona Coleman Rail Joint Venture (Acciona Infrastructure Projects Australia Pty and Coleman Rail Pty Ltd) consortia.

In accordance with Conditions 16, 17 and 18 of the *EPBC Act* Approval, LXRP engaged KPMG Australia Pty Ltd (KPMG) to undertake an Independent Audit (IA) of compliance with the conditions of the EPBC Act Approval. Specifically, Condition 16 of the *EPBC Act* Approval requires that:

“Independent audits of compliance with the conditions are conducted for the 12-month period from commencement of the action and for every subsequent 24-month period until the approval expires...”

KPMG conducted the Independent Audit for the 12-month period from the commencement of the action, as required under Condition 16, with the audit 1 period under consideration being October 2020 – October 2021. Following audit 1, KPMG conducted the Independent Audit for the subsequent 24-month period as required under Condition 16, with the audit 2 period under consideration being October 2021 – October 2023.

The IA considered the conditions of the *EPBC Act* Approval in accordance with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019 (the Guidelines). It is noted that LXRP's EPBC Act Approval references the 2015 version of the Guidelines, given the 3 December 2018 of the Approval decision. The revised 2019 Guidelines were adopted to conduct this IA in agreement with LXRP.

1.2 Overview of Scope

The scope of the IA services was to assess activities associated with removing two-level crossings at Edithvale and Bonbeach, Victoria, against the conditions of the *EPBC Act* Approval held by LXRP.

The IA scope of services was conducted and carried out in accordance with the Guidelines, which included the completion of four key tasks for the audit as described herein, noting that KPMG had completed the first two tasks in a previous submission titled *Auditor Competence and Audit Criteria/Methodology Package* dated 22 April 24.

¹ Any references to 'audit' throughout this Independent Audit Report has not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board.

- Task 1: development of the audit criteria and methodology and formed part of the *Auditor Competence and Audit Criteria/Methodology Package* dated 19 April 2024.
- Task 2: approval of the *Auditor Competence and Audit Criteria/Methodology Package* dated 22 April 2024 by the Department of Climate Change, Energy, the Environment and Water (DCCEEW). Approval was received from DCCEEW before the commencement of the subsequent audit on 13 May 2024, and approval covered the nominated audit team and the proposed audit criteria and methodology.
- Task 3: conduct audit activities using a combination of methods, including a site inspection, an interview with relevant staff, and an assessment of relevant documentation. The audit commenced on 3 June 2024, and activities were completed on 5 July 2024.
- Task 4: preparation of an audit report for provision to LXR and subsequent submission by LXR to DCCEEW, ultimately for approval. It is noted that after approval, the report will be publicly available. This document includes the audit details, methodology, the Independent Auditor's certification, and detailed audit findings.

2. Audit Approach

2.1 Methodology

The audit methodology included the desktop assessment of documentation (only where required by the approved criteria methodology), a site inspection, and an interview. Specifically, the audit process included the following activities:

- **Audit inception meeting:** a kick-off meeting was conducted on 7 June 2024 with the auditees, LXR, to outline audit objectives and confirm the logistics of the stakeholder interview.
- **A stakeholder interview:** an interview was conducted with key personnel from LXR and SPA on 11 June 2024. The interview focussed on collecting evidence associated with compliance with the *EPBC Act* Approval and the activities undertaken during the audit period to comply with the approval conditions. Additionally, the interview assisted KPMG to understand the nature of the activities undertaken at the site. The details of the stakeholder interview are provided in **Appendix D**.
- **Document assessment:** Documentation relevant to the audit scope was collected and assessed from 2 May 2024 to 11 June 2024. Documentation assessment was undertaken only to the extent required by the approved criteria methodology, as outlined in **Appendix E**. It did not include a broader assessment of the documents received for completeness or technical validation². Documents received included management plans, monitoring reports, approvals, and email correspondence. The document assessment directly informed the collation of the evidence used to assess compliance with the approval conditions. A complete list of documents, emails and management plans used during the audit assessment process is provided in **Appendix C**.

2.2 Compliance Criteria

The compliance criteria adopted by the IA aligned with the Department's Guidelines and were used as the basis to assess compliance and categorise findings and observations. The criteria include:

- **Compliant**
- **Non-Compliant**
- **Not Applicable**
- **Observation**

The full compliance criteria, including a description of each criterion, are provided in **Appendix A**.

² It is noted that the monitoring data received, including those present in the Groundwater Monitoring Program, was considered as evidence of implementation of the required monitoring activities as outlined in the required Groundwater Monitoring Management Plan (GMMP), and Edithvale Wetlands Monitoring and Mitigation Plan (EWMMP). The stakeholder interview was used to ascertain the appropriate application of the data received against any thresholds present in GMMP and EWMMP, and no additional validation of data was performed, in alignment with the scope of this audit.

3. Details of the Audit

3.1 Project Name

The name of the project is Edithvale and Bonbeach Level Crossing Removal, Edithvale and Bonbeach, Victoria (EPBC Approval 2017/7906 dated 3 December 2018).

3.2 Project Approval Holder

The name of the project approval holder is Level Crossing Removal Project (LXRP).

3.3 Approval Details

This audit was undertaken against the *EPBC Act* Approval titled *Edithvale and Bonbeach Level Crossing Removal, Edithvale and Bonbeach, Victoria (EPBC 2017/7906)*. This audit is undertaken for the subsequent 24-month period (audit 2), dated October 2021 – October 2023, following the initial 12-month period (audit 1), dated October 2020 – October 2021. Audit 2 was undertaken in accordance with Condition 16:

“Independent audits of compliance with the conditions are conducted for the 12-month period from the commencement of the action and for every subsequent 24-month period until the approval expires.”

3.4 Scope of the Audit

The scope of the IA services was to assess activities associated with the removal of two-level crossings at Edithvale and Bonbeach, Victoria, against Conditions 1 to 25 of the *EPBC Act* Approval held by LXRP for the audit period from October 2021 to October 2023.

3.5 Implementation of the Audit

The dates and locations corresponding with the implementation of the audit are noted as follows:

- KPMG Melbourne Office - Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria (Desktop Assessment: 3 June 2024 to 25 June)
- LXRP Office - 121 Exhibition Street Melbourne VIC 3000 (Interview: 11 June 2024 from 9:00 am to 12:00 pm)

3.6 Methods Used to Assess Compliance

The methods used to assess compliance are presented in Section 2, Audit Approach, and included a desktop assessment of documentation (only where required by the approved criteria methodology), a site inspection, and a stakeholder interview.

3.7 Evidence Considered to Assess Compliance

The evidence considered to assess compliance is detailed in **Appendix E**. Example evidence includes email correspondences from and to LXRP, management plans including the Edithvale Wetland Monitoring and Mitigation Plan, supporting technical information, outcomes from a stakeholder interview, and a site inspection.

4. Auditor Certification

The certification of all auditors is provided in **Appendix B**, and it is noted that they are consistent with the approved audit criteria and methodology package (Document 15 in **Appendix C**) approved by DCCEEW.

5. Detailed Audit Findings

The findings from the audit activities are provided in **Appendix E** and prepared per the minimum requirements outlined in *the Guidelines*. These detailed audit findings demonstrate the verification³ method, documents sighted, evidence utilised, determination and compliance findings against all criteria under each approval condition.

Based on the documentation assessed and provided in **Appendix C** for the audit period, the IA identified two (2) non-compliant findings concerning the EPBC Act Approval. There are no formal observations made.

5.1 Non-Compliant Findings

EPBC Approval Condition 13	Whilst the IA observed publication of each compliance report on the website, it was identified Annual Compliance Report No. 2 was published 65 business days following the date the report was prepared.	Non-Compliant
Criteria 13.2 Publication of prepared compliance reports within 60 business days following the relevant 12-month period		

Condition 13 of the Approval requires the approval holder to prepare a compliance report for each 12-month period following the date of commencement of the action. Condition 13 (a) requires the approval holder to publish each compliance report within 60 business days following the relevant 12-month period.

During the audit, evidence was sighted confirming the annual compliance reports were published on the LXP website. It was noted during the stakeholder interview, the approval holder had not uploaded the annual compliance report within the required 60 business days. It was noted to be published 65 business days following the date of preparation.

Annual Compliance Report No. 3 was found to have been published 20 days following the date of preparation of the report.

Given the Annual Compliance Report No. 2 exceeded the 60 business days requirement, the Independent Auditor considers this criterion to be non-compliant.

³ Any reference to 'verification' or 'verification method' throughout this Independent Audit Report refers to its respective meaning defined in *the Guidelines* and has not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board.

EPBC Approval Condition 13 (b)		
Criteria 13.3 notify the Department by email that a compliance report has been published on the website within five business days of the date of publication	Notification to the Department that the Annual Compliance Report No. 2 was published on the website occurred 54 business days after publication.	Non-Compliant

Condition 13 (b). of the Approval requires that the Department must be notified by email within five business days that a compliance report has been published on the website, from the date of publication.

The Department was notified the Annual Compliance Report No. 2 was uploaded to the website 54 business days from the day of its publication.

As the notification occurred outside the required five business days, the Independent Auditor considers this criterion to be non-compliant.

5.2 Previous Audit Findings (Audit 1)

While performing testing for Audit 2, the IA identified an error with regards to a finding issued in the previous audit report (Audit 1). The finding raised was in relation to EPBC Approval Condition 11 (b). It was noted the date EWMMP V2 was submitted to the Minister on 18 June 2020 and published on 7 August 2020, however the date the EWMMP V2 was published was 8 July 2020. The IEA previously assessed this finding as non-compliant, however on further review during the course of Audit 2, it was noted the date was read incorrectly. The date the report was published on the website was within the required timeframe (15 business days) and thus compliant with the Approval Condition.

Appendix A – Compliance Criteria

The criteria specified below, which are in accordance with the Department's Guidelines, were used for the rating and classification of findings:

Criteria	Criteria Description
Compliant	A rating of 'Compliant' is given when the auditee has complied with a condition or element of a condition.
Non-Compliant	A rating of 'non-Compliant' is given when the auditee has not met a condition or an element of a condition.
Not Applicable	A rating of 'Not Applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit, e.g., if an activity has not yet commenced or a requirement has not been triggered.
Observations	An 'Observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

Appendix B – Auditor’s Certification

Project and Technical Lead (EPA-Accredited Environmental Auditor)

Auditor’s name, position, company and contact details: Project and Technical Lead (EPA-Accredited Environmental Auditor), Partner, KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008, +61 (3) 9288 6171.

Auditor’s qualifications and/or experience:

Education:

- Master of Engineering (Chemical) (Research)
- Master of Engineering (Environment)
- Bachelor of Applied Science (Distinction)

Certifications and Registrations:

- Accredited Environmental Auditor (Industrial Facilities), Victorian EPA pursuant to the Environmental Protection Act, 1970
- Department of Transport – certified Environment and Safety Auditor Pursuant to Marine Safety Act, 2010
- Member, Victorian EPA EASIG Committee for EPA- appointed Auditors

Experience:

- 30 years of experience directing and executing panel-led, multi-site, multi-jurisdictional work programs.
- Decades of experience in post-approval compliance auditing for Commonwealth and State governments.
- In-depth understanding of transport and infrastructure operational and regulatory environment, bringing an enterprise-wide risk perspective to Independent Auditor services.
- Strong risk and compliance expertise across environment and WHS impacts, and EPA-accredited auditor since 1996.

Auditor’s declaration:

I, the Project and Technical Lead (EPA-Accredited Environmental Auditor), of KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008.

For environmental audits that are required by a condition of an Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval, I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine of not more than 60 penalty units, or both.

For directed environmental audits that are required pursuant to section 458 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature: **CONFIDENTIAL**

Date: April 2024



Reappointment by the Environment Protection Authority under the Environment Protection Act 2017

Environmental Auditor

The Environment Protection Authority ("the Authority"), pursuant to its power in section 191(1) of the *Environment Protection Act 2017* ("the Act"), and by the operation of section 198(4) of the Act, hereby reappoints the following person as an **Environmental Auditor**, for the purposes of the Act and the Environment Protection Regulations 2021 made under the Act ("the Regulations"):

Name: Project Lead and Technical Lead

Appointment ID: CONFIDENTIAL

Pursuant to section 197(1)(b) of the Act, this reappointment is subject to the following condition(s), and any conditions in the Schedule of Conditions:

1. This reappointment relates to the category (or categories) of reappointment listed below only:
 - a. Industrial facilities
2. This reappointment is subject to compliance with the Act, Regulations and any guidelines issued by the Authority under section 203 of the Act, including but not limited to the most recent edition of the *Environmental Auditor guidelines for appointment and conduct* Publication 865.

This reappointment takes effect on CONFIDENTIAL

Unless otherwise revoked earlier by the Authority under section 200 of the Act, in accordance with section 195(c) of the Act, the term of this reappointment will expire on CONFIDENTIAL

CONFIDENTIAL

Signature of Delegate: _____

Name of Delegate: CONFIDENTIAL

Delegate Position: Manager, Environmental Audit

Delegate of the Environment Protection Authority.

Date of Reappointment: CONFIDENTIAL

Environment Protection Authority Victoria
GPO BOX 4395 Melbourne VIC 3001
1300 372 842 (1300 EPA VIC) www.epa.vic.gov.au



Project Lead/Lead Environmental Auditor

Auditor's name, position, company and contact details: Project Manager/Lead Environmental Auditor, Manager, KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008.

Auditor's qualifications and/or experience:

Education:

- Master of Sustainable Practice, RMIT
- B.A in International Relations and Development, UNSW

Experience:

- KPMG Australia – Independent Environmental Audit Services – Audit Lead

Auditor's declaration:

I, the Project Manager/Lead Environmental Auditor, of KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008.

For environmental audits that are required by a condition of an Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval, I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine of not more than 60 penalty units, or both.

For directed environmental audits that are required pursuant to section 458 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature: **CONFIDENTIAL**

Date: April 2024

Support Environmental Auditor

Auditor's name, position, company and contact details: Support Environmental Auditor, Senior Consultant, KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008, +61 (3) 9288 6171.

Auditor's qualifications and/or experience:

Education:

- The University of Melbourne, Master of Engineering (Environmental)
- Saint Louis University, Bachelor of Chemistry and Bachelor of Business Administration

Experience:

- KPMG Australia – Independent Environmental Audit Services – Audit Assistant

Auditor's declaration:

I, the Support Environmental Auditor, of KPMG Australia, Tower Two, Collins Square, 727 Collins Street, Melbourne, Victoria, 3008.

For environmental audits that are required by a condition of an Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval, I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine of not more than 60 penalty units, or both.

For directed environmental audits that are required pursuant to section 458 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct, and complete.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature: **CONFIDENTIAL**

Date: April 2024

Appendix C – Document List

Per the Audit Approach, our audit team collected and assessed documentation relevant to the audit scope. This included management plans, monitoring reports, approvals, emails, and details of incidents within the audit period. The purpose of the document assessment was to gather evidence to assess compliance with the approval conditions. A complete list of documents, emails and management plans used during the audit assessment process can be found below.

Documents considered:

Document	Name / Description	Attached
1	Department approval letter GMMP Version 1 and EWMMP Version 1	Y
2	GMMP Version 4 Explanatory Memorandum	Y
3	GMMP Version 5 Explanatory Memorandum	Y
4	As-built construction program	Y
5	Approved Environmental Management Framework (EMF) with Minister letter	Y
6	EPBC Act approval 2017-7906	Y
7	Groundwater Monitoring Program (13 October 2020 to 12 October 2023)	Y
8	Monthly Report for audit FINAL	Y
9	Trigger Review Summary - Groundwater Monitoring and Management Plan	Y
10	Year 1 Annual Compliance Report	Y
11	Year 2 Annual Compliance Report	Y
12	Year 3 Annual Compliance Report	Y
13	Webpage history of edits	Y
14	Condition 7 Commencement of Action signed letter	Y
15	SPA incident register FINAL	Y
16	LXRP EPBC Act Approval - Independent Audit - Pack for Department Approval (Issued 22.04.24)	Y

Emails considered:

Email	Name / Description	Attached
1	Department Notification GMMP V2, V3, V4, V5 and EWMMP V1 and V2	Y
2	Email from TA re GMMP V3, V4 and V5 lodgement	Y
3	Email from LXRP to the Audit Team	Y
4	Evidence of publication of Year 1, 2 and 3 Compliance Report on Website	Y
5	Notification of Year 1, 2 and 3 Compliance Report to Department	Y
6	2017-7906 - Edithvale and Bonbeach level Crossing removal	Y
7	Audit Commencement	Y

Management plans considered:

Abbreviation	Name / Description	Attached
GMMP V3	Approved GMMP Version 3	Y
GGMP V4	Approved GMMP Version 4	Y
GMMP V5	Approved GMMP Version 5	Y
EWMMP V2	Approved EWMMP Version 2	Y

Appendix D – Audit Interview

Per the Audit Approach, an interview was held with key personnel from LXP and SPA on 11 June 2024. The interview focussed on collecting evidence associated with compliance with the EPBC Act Approval and the activities undertaken during the audit period to comply with the approval conditions. Additionally, the interview assisted KPMG to understand the nature of the activities undertaken at the site.

Interview: 11 June 2024 – 9:00 am to 12:00 pm

Participants	Organisation
Senior Manager Land, Planning and Environment	LXP
Hydrogeology Discipline Lead	LXP TA
Associate Environmental Consultant	LXP TA
Project Manager/Lead Environmental Auditor	KPMG

Appendix E - Detailed Audit Findings

Audit Criteria and Methodology (EPBC Act Approval Independent Audit)

Inherent Limitations

This Audit Criteria and Methodology has been prepared as outlined in the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines*, Commonwealth of Australia 2019 and at the request of the Level Crossing Removal Project in accordance with the terms of KPMG's engagement contract dated 27 November 2023. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

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

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the Level Crossing Removal Project consulted as part of the process.

KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report. KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.

The findings in this report have been formed on the above basis.

Third Party Reliance

This Audit Criteria and Methodology is solely for the purpose set out in the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019 and for information for the Level Crossing Removal Project and Department of Climate Change, Energy, the Environment and Water (DCCEEW), and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This report has been prepared at the request of the Level Crossing Removal Project, in accordance with the terms of KPMG's engagement contract dated 27 November 2023. Other than our responsibility to the Level Crossing Removal Project and DCCEEW, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this Audit Criteria and Methodology. Any reliance placed is that party's sole responsibility.

Any references to 'audit', 'review' and 'verification' in this Audit Criteria and Methodology have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance, or an audit opinion have been expressed in this report.

AUDIT PERIOD: The 24-month period from October 2021 to October 2023

DATE OF REPORT: 5 July 2024

REPORT PREPARED BY: Project and Technical Lead (EPA-Accredited Environmental Auditor), Project Manager/Lead Environmental Auditor, and Support Environmental Auditor

PART	CONDITIONS OF EPBC ACT APPROVAL					
A - Conditions specific to the action	EPBC Approval Condition 1.		<i>"The approval holder must submit a Groundwater Monitoring and Management Plan for the Minister's approval that ensures predicted and potential impacts to groundwater as a result of the action are monitored, and corrective actions implemented if applicable trigger values are reached."</i>			
			Verification Method	Evidence	Documents Sighted	Determination
1.1	Minister approval of Groundwater Monitoring and Management Plan (GMMP)	Sighting the Minister's letter of approval of the GMMP alongside the approved version of the GMMP that was in place during the audit period.	<ol style="list-style-type: none"> Email from the Department dated 2 December 2019: EPBC 2017/7906, Edithvale and Bonbeach Level Crossing Removal Projects, Victoria - Groundwater Monitoring and Management Plan and Edithvale Wetland Monitoring and Mitigation Plan. Email from the Department, dated 4 January 2022, confirming acceptance of GMMP V4. Email from the Department, dated 8 January 2024, confirming acceptance of GMMP V5. 	<ol style="list-style-type: none"> Email confirms Minister's approval of GMMP V1. Email confirms receipt and approval of GMMP V4. Email confirms receipt and approval of GMMP V5. 	<p>The Ministers Letter of Approval for GMMP V1 has been obtained. It is noted updated versions of the GMMP (V4 and 5) have since been implemented.</p> <p>During the audit period (October 2021 – October 2023), the GMMP was revised to V4 and notice was given to the Department on 23 December 2021. Acceptance was received from the Department on 4 January 2022. This is supported by a memorandum from GHD-AECOM to LXR, dated 23 December 2021, outlining summary of changes and incorporated revisions.</p> <p>It is noted GMMP V5 (the current version) was prepared during the audit period (dated 22 September 2023), however notice of GMMP V5 was provided to the Department outside the audit period on 5/12/2023. GMMP V5 was accepted on 08/01/2024 and implemented from 22/01/2024.</p> <p>Where revisions are required, it is understood that the Department does not re-issue an updated Letter of Approval, and instead the Department may confirm receipt of an amended plan via email. It was also noted in the stakeholder interview that email confirmation from the Department was not always received.</p> <p>In place of an updated Ministers Letter of Approval for, the email notification process from LXR to the Department was instead considered. The email notification from LXR to the Department for GMMP V4 satisfies this condition.</p> <p>The Independent Auditor considers this criterion to be compliant</p>	Compliant
	EPBC Approval Condition 2.		<i>"The approval holder must not commence the action unless the Minister has approved the Groundwater Monitoring and Management Plan in writing. The approval holder must implement the Groundwater Monitoring and Management Plan approved by the Minister."</i>			
			Verification Method	Evidence	Documents Sighted	Determination
2.1	Commencement of the Action	Comparison between the date of commencement of the action, and the date of the Minister's letter of approval for the GMMP	<ol style="list-style-type: none"> Commencement of Action letter, dated 20 October 2020 (received as evidence for Audit 1) Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture; 	<ol style="list-style-type: none"> The commencement of action was on 13 October 2020, and GMMP V3 was approved on 26 August 2020. Subsequently, GMMP V4 was approved on 23 December 2021 and GMMP V5 was submitted for approval 6 December 2023. and 3. As outlined in the GMMP V4 and V5 Memorandum(s). Section 8.2 of the RAMP states 'The plan is to be reviewed annually for the first two years, then not less than every second year to consider the adequacy of the groundwater monitoring program and the need for future groundwater monitoring beyond the minimum 10-year period. The review shall consider all aspects of the Plan, including those outlined in Section 6.1 (i.e., reporting and data management requirements)'. An annual review in accordance with Section 8.2 of the RAMP was completed by the JV for: <ul style="list-style-type: none"> The period 13 October 2020 to 12 October 2021 (Year 1 of RAMP implementation), with the RAMP (Version 4) prepared and implemented in accordance with Condition 21 of Approval 2017/7906 on 2 February 2023. The period 13 October 2021 to 12 October 2022 (Year 2 of RAMP implementation) and a RAMP (Version 5) prepared. 	<p>The action commenced after GMMP was approved. Subsequently, annual reviews can be evidenced by submission of GMMP V4 and V5 to the Department.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant

					1.		
2.2	Implementation of the approved GMMP	Comparison of the version number of the GMMP approved by the Minister, and the version of the GMMP used in implementation during the audit period.	<ol style="list-style-type: none"> Commencement of Action letter, dated 20 October 2020 (received as evidence for Audit 1) Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 22 December 2021, signed by Senior Manager, Land Planning and Environment, Land, Planning and Environment, Southern Program Alliance. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 22 December 2021, signed by Senior Manager, Land Planning and Environment, Land, Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> Commencement of Action letter from the Department, dated 20 October 2020, confirms commencement of action occurred 13 October 2020 (received Audit 1). Memorandum – GMMP V4, dated 23 December 2021 by GHD-AECOM Joint Venture states: "The plan was approved initially by the Australian Minister for the Environment on 2 December 2019. Revision 3 was approved on 26 August 2020." "Revision 3 of the RAMP [GMMP 3] was approved by the Australian Minister for the Environment on 26 August 2020, and implemented concurrent with the construction of the Projects on 13 October 2020." Memorandum – GMMP V5, dated 22 September 2023 by GHD-AECOM Joint Venture states: An annual review in accordance with Section 8.2 of the RAMP was completed by the JV for the period 13 October 2020 to 12 October 2021, and 13 October 2021 to 12 October 2022. Condition reference number 2 of Table 2 provides more information on this criterion. Condition reference number 2 of Table 2 provides more information on this criterion. 	<p>As outlined in GMMP V4 and V5 Memorandum(s), GMMP V3 was approved by the Australian Minister for the Environment on 26 August 2020, and implemented concurrently with the construction of the Projects on 13 October 2020.</p> <p>Subsequently, GMMP V4 was approved on 23 December 2021 and implemented on 2 February 2022. It is noted GMMP V5 was submitted for approval 6 December 2023 in accordance with annual review requirements.</p> <p>As a result, GMMP V4, was noted to have been implemented after action commencement. Implementation of GMMP V5 is outside the audit period.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
EPBC Approval Condition 3.		<p><i>"The Groundwater Monitoring and Management Plan must be consistent with the relevant Environmental Performance Requirement approved by the Victorian Minister, and must include:</i></p> <p><i>a. The Groundwater Monitoring and Management Plan environmental objectives, relevant EPBC Act protected matter/s and a table setting out where it addresses the EPBC Act approval conditions applicable to the Groundwater Monitoring and Management Plan;</i></p> <p><i>b. A table of commitments made in the Groundwater Monitoring and Management Plan to achieve the objectives, and reference to where each commitment is detailed in the Groundwater Monitoring and Management Plan;</i></p> <p><i>c. Reporting and review mechanisms, and documentation standards to demonstrate compliance with the Groundwater Monitoring and Management Plan;</i></p> <p><i>d. An assessment of risks to achieving Groundwater Monitoring and Management Plan environmental objectives and risk management strategies that will be applied;</i></p> <p><i>e. Impact avoidance, mitigation and/or repair measures, and their timing; and</i></p> <p><i>f. A monitoring program, which must include:</i></p> <p><i>i. measurable performance indicators;</i></p> <p><i>ii. the timing and frequency of monitoring to detect changes in the performance indicators;</i></p> <p><i>iii. trigger values for corrective actions; and</i></p> <p><i>iv. corrective actions, and commitments to implement these actions if trigger values are reached."</i></p>					
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
3.1	Consistency with approved Environmental Performance Requirements (EPR)	Comparison of the relevant EPR approved by the Victorian Minister in the applicable Environmental Management Framework (or equivalent) with the contents of the GMMP.	<ol style="list-style-type: none"> GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance Edithvale and Bonbeach Level Crossing Removal Projects Environmental Management Framework, dated December 2018, LXRP 	<ol style="list-style-type: none"> Table 12 and 13 outlines EPR alignment. Table 12 and 13 outlines EPR alignment. The condition reference number 3(a) of Table 2 provides more information on this criterion. The condition reference number 3(a) of Table 2 provides more information on this criterion. Table 6 outlines all EPRs, including GW2, CL5, FF7, GW1 and GW4. 	<p>The relevant EPRs (GW2, CL5 FF7, GW1 and GW4) approved by the Victorian Minister in the applicable Environmental Management Framework are the same as those within the contents of GMMP V4 and V5.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
3.2	Inclusion of environmental objectives within the GMMP	Sighting of environmental objectives within the GMMP.	<ol style="list-style-type: none"> GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 	<ol style="list-style-type: none"> Table 1 outlines objectives of the Groundwater Monitoring and Management Plan and commitments. Table 1 outlines objectives of the Groundwater Monitoring and Management Plan and commitments. The condition reference number 3(a) of Table 2 provides more information on this criterion. The condition reference number 3(a) of Table 2 provides more information on this criterion. 	<p>Environmental objectives sighted in GMMP V4 and GMMP V5.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
3.3	Inclusion of relevant EPBC Act protected matter/s within the GMMP	Sighting of the EPBC Act protected matter/s included within the GMMP and assess for completeness.	<ol style="list-style-type: none"> GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 	<ol style="list-style-type: none"> Section 1.2 <i>Background Studies: Key Findings</i> and Figure 1 outlines Edithvale Wetland as a protected matter as defined by the EPBC Act. GMMP V5 refers to Edithvale Wetland as the protected matter. The condition reference number 3(a) of Table 2 provides more information on this criterion. The condition reference number 3(a) of Table 2 provides more information on this criterion. 	<p>Edithvale Wetlands referred to as the Protected Matter in accordance with the EPBC Act within GMMP V4 and GMMP V5.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	

3.4	Inclusion of a table addressing applicable EPBC Act approval conditions within the GMMP	Sighting of a table within the GMMP addressing the applicable EPBC Act approval conditions and comparison of the project's EPBC Act approval conditions and those within the aforementioned table; and Assessment of the table within the GMMP addressing the applicable EPBC Act approval conditions for completeness.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 	<ol style="list-style-type: none"> 1. Table 13 outlines EPBC Act approval conditions and document reference. 2. Table 13 outlines EPBC Act approval conditions and document reference. 3. The condition reference number 3(a) of Table 2 provides more information on this criterion. 4. The condition reference number 3(a) of Table 2 provides more information on this criterion. 	GMMP V4, GMMP V5, Annual Compliance Report No. 2 and Annual Compliance Report No. 3 include table addressing applicable EPBC Act approval conditions. The Independent Auditor considers this criterion to be compliant.	Compliant
3.5	Inclusion of a table outlining commitments made to achieve objectives within the GMMP	Sighting of a table within the GMMP outlining the commitments made to achieve the environmental objectives; Sighting of references of the aforementioned commitments within the GMMP and assess evidence of implementation; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how commitments made have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. Table 1 in Section 1.5 <i>Objectives and Approach</i> outlines objectives of the GMMP and commitments. 2. Table 1 in Section 1.5 <i>Objectives and Approach</i> outlines objectives of the GMMP and commitments. 3. The condition reference number 3(b) of Table 2 provides more information on this criterion. 4. The condition reference number 3(b) of Table 2 provides more information on this criterion. 	GMMP V4, GMMP V5, Annual Compliance Report No. 2 and Annual Compliance Report No. 3 include table outlining commitments made to achieve objectives. The Independent Auditor considers this criterion to be compliant.	Compliant
3.6	Inclusion of reporting mechanisms to demonstrate compliance within the GMMP	Sighting of reporting mechanisms within the GMMP and assess evidence of implementation; and Completing stakeholder interviews to further understand how reporting mechanisms have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 6. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 6 <i>Reporting, notification and audit</i> outlines the following: <ul style="list-style-type: none"> • Groundwater database to be maintained for the purposes of storing groundwater level and quality monitoring data. Refer to Appendix B and Appendix C within the GMMP V4 for detailed procedure. • Annual compliance reporting prepared and made publicly available in accordance with Section 13 of EPBC Approval 2017/7906. 2. Section 6 <i>Reporting, notification and audit</i> outlines the following: <ul style="list-style-type: none"> • Groundwater database to be maintained for the purposes of storing groundwater level and quality monitoring data. Refer to Appendix B and Appendix C within the GMMP V5 for detailed procedure. • Annual compliance reporting prepared and made publicly available in accordance with Section 13 of EPBC Approval 2017/7906. 3. The condition reference number 3(c) of Table 2 provides more information on this criterion. Annual compliance report demonstrates evidence of reporting mechanism. 4. The condition reference number 3(c) of Table 2 provides more information on this criterion. Annual compliance report demonstrates evidence of reporting mechanism. 5. Groundwater Monitoring Program Reports evidence monitoring results undertaken during the audit period. 6. Stakeholder interview covered monitoring processes, data collection, monitoring locations, sampling methodology and trigger assessment. Additionally, it is understood GHD-AECOM performed a handover with WSP in April 2023, covering project, monitoring and GMMP implementation responsibilities. 	GMMP V4 and GMMP V5 outline reporting mechanisms. Annual Compliance Report No. 2, Annual Compliance Report No. 3, Groundwater Monitoring Program Reports and stakeholder interview evidence implementation of reporting mechanisms to demonstrate compliance. It is noted the stakeholder interview addressed how reporting mechanisms have been implemented, including handover of reporting responsibilities between GHD-AECOM and WSP. The Independent Auditor considers this criterion to be compliant.	Compliant
3.7	Inclusion of review mechanisms to demonstrate compliance within the GMMP	Sighting of review mechanisms within the GMMP and assess evidence of implementation; and Completing stakeholder interviews to further understand how review mechanisms have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 6. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 7 <i>Roles and Responsibilities</i> outlines the process and responsibilities for review mechanisms to ensure compliant implementation of the plan is undertaken. Additionally, Section 8 <i>Implementation of the Plan</i> addresses review procedures. 2. Section 7 <i>Roles and Responsibilities</i> outlines the process and responsibilities for review mechanisms to ensure compliant implementation of the plan is undertaken. Additionally, Section 8 <i>Implementation of the Plan</i> addresses review procedures. 3. The condition reference number 3(c) of Table 2 provides more information on this criterion. Annual compliance report demonstrates evidence of implementing reporting mechanism(s). 4. The condition reference number 3(c) of Table 2 provides more information on this criterion. Annual compliance report demonstrates evidence of implementing reporting mechanism(s). 5. Groundwater Monitoring Program Reports evidence monitoring results undertaken and reviewed during the audit period. 6. Stakeholder interview covered monitoring processes, data collection, monitoring locations, sampling methodology and trigger assessment. Additionally, it is understood GHD-AECOM performed a handover with WSP in April 2023, covering project, monitoring and GMMP implementation responsibilities. 	GMMP V4 and GMMP V5 outline review mechanisms. Annual Compliance Report No. 2, Annual Compliance Report No. 3, Groundwater Monitoring Program Reports and stakeholder interview evidence implementation of review mechanisms to demonstrate compliance. It is noted the stakeholder interview addressed how review mechanisms have been implemented, including handover of review responsibilities between GHD-AECOM and WSP. The Independent Auditor considers this criterion to be compliant.	Compliant
3.8	Inclusion of documentation standards to demonstrate compliance within the GMMP	Sighting of documentation standards within the GMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. GMMP V4 is complete and document control is outlined. 2. GMMP V5 is complete and document control is outlined. 3. The condition reference number 3(c) of Table 2 provides more information on this criterion. 4. The condition reference number 3(c) of Table 2 provides more information on this criterion. 	GMMP V4 and GMMP V5 outline 'Document Control' and includes correct date(s), complete information documented, and evidence of review and sign-off. The Independent Auditor considers this criterion to be compliant.	Compliant

3.9	Inclusion of a risk assessment assessing the achievability of environmental objectives within the GMMP	Sighting of a risk assessment output within the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand the risk assessment process undertaken.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. 7. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture. 	<ol style="list-style-type: none"> 1. GMMP V4 outlines risks assessed relevant to achieving environmental objectives in Table 11. 2. GMMP V5 outlines risks assessed relevant to achieving environmental objectives in Table 11. 3. The condition reference number 3(d) of Table 2 provides more information on this criterion. Additionally, section 4.3 of the Annual Compliance Report outlines new environmental risks identified. It is noted the new environmental risks identified do not impact the GMMP environmental objectives. 4. The condition reference number 3(d) of Table 2 provides more information on this criterion. Additionally, section 4.3 of the Annual Compliance Report outlines new environmental risks identified. It is noted the new environmental risks identified do not impact the GMMP environmental objectives. 5. Stakeholder interview covered risk assessment procedures undertaken and are further outlined in the GMMP V4 and GMMP V5 memorandums. 6. GMMP V4 Memorandum outlines relevant risks and amendments to risk assessments undertaken. 7. GMMP V5 Memorandum outlines relevant risks and amendments to risk assessments undertaken. 	GMMP V4 and GMMP V5 outline risk assessment outputs within Table 11. Additionally, Annual Compliance Report No. 2 and No. 3 demonstrate compliance and achievement of environmental objectives. Stakeholder interview held addresses risk assessment processes, including updates to the risk profile, which are further evidenced in the respective GMMP memorandums. The Independent Auditor considers this criterion to be compliant.	Compliant
3.10	Inclusion of risk management strategies to address the risk assessment within the GMMP	Sighting of the risk management strategies to address the risk assessment within the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand the risk management strategies were developed following the risk assessment process undertaken.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. 7. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture. 8. Groundwater Quality Mitigation Plan dated 17 February 2021. 	<ol style="list-style-type: none"> 1. GMMP V4 outlines risks assessed as relevant to achieving environmental objectives in Table 11. 2. GMMP V5 outlines risks assessed as relevant to achieving environmental objectives in Table 11. 3. The condition reference number 3(d) of Table 2 provides more information on this criterion. Additionally, section 4.3 of the Annual Compliance Report outlines new environmental risks identified. It is noted the new environmental risks identified do not impact the GMMP environmental objectives. 4. The condition reference number 3(d) of Table 2 provides more information on this criterion. Additionally, section 4.3 of the Annual Compliance Report outlines new environmental risks identified. It is noted the new environmental risks identified do not impact the GMMP environmental objectives. 5. Stakeholder interview covered risk management approaches, and their implementation is further outlined in the GMMP V4 and GMMP V5 memorandums. 6. GMMP V4 Memorandum outlines relevant risk management processes in relation to amendments to risk assessments undertaken. 7. GMMP V5 Memorandum outlines relevant risk management processes in relation to amendments to risk assessments undertaken. 8. Groundwater Quality Mitigation Plan details mitigation measures corresponding to relevant risk analysis determinations. 	GMMP V4 and GMMP V5 outline risk assessment outputs within Table 11. Additionally, Annual Compliance Report No. 2 and No. 3 demonstrate compliance and achievement of environmental objectives. Stakeholder interview held addresses risk management strategies, including reviews to the risk profile due to evolving works program, and groundwater quality mitigation processes as outlined in the Groundwater Quality Mitigation Plan. The Independent Auditor considers this criterion to be compliant.	Compliant
3.11	Inclusion of impact avoidance measures and their timing within the GMMP	Sighting of the impact avoidance measures and the associated timing within the GMMP and assess evidence of implementation; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how impact avoidance measures have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. 7. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture. 	<ol style="list-style-type: none"> 1 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline impact avoidance measures and associated parameters (such as timing). 2 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline impact avoidance measures and associated parameters (such as timing). 3 The condition reference number 3(e) of Table 2 provides more information on this criterion. 4 The condition reference number 3(e) of Table 2 provides more information on this criterion. 5 Stakeholder interview addressed impact avoidance measures and monitoring plan as documented within the GMMP. Additionally, the EWMMP will be implemented should triggers be met. It is noted the EWMMP has not been triggered during the audit period. 6 GMMP V4 Memorandum states updated GMMP will not likely result in new or increased impacts on any protected matter. Changes to GMMP V4 included: <ul style="list-style-type: none"> • Updates to legislative requirements. • Updates to incorporate replacement groundwater monitoring bores. • Updates to reflect cessation of construction phase activities. 7 GMMP V5 Memorandum states updated GMMP will not likely result in new or increased impacts on any protected matter. Changes to GMMP V5 included: <ul style="list-style-type: none"> • Updates to the structure and content to simplify future implementation; and • Updates to reflect increased understanding of groundwater conditions of the project. 	GMMP V4 and GMMP V5 outline impact avoidance measures and associated parameters (including timing) within sections 3, 4 and 5. Stakeholder interview conducted provided additional understanding regarding the implementation of avoidance measures, particularly with the implementation of the EWMMP should certain triggers outlined with the GMMP be met. Further evidence provided in the relevant GMMP Memorandums and Annual Compliance Reports demonstrates implementation processes and compliance with regards to impact avoidance. The Independent Auditor considers this criterion to be compliant.	Compliant
3.12	Inclusion of mitigation and/or repair measures and their timings within the GMMP	Sighting of mitigation and/or repair measures and their timings within the GMMP and assess evidence of implementation; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how mitigation and/or repair measures made have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Memorandum Groundwater Monitoring and Management Plan V4, dated 23 December 2021 by GHD-AECOM Joint Venture. 7. Memorandum Groundwater Monitoring and Management Plan V5, dated 22 September 2023, by GHD-AECOM Joint Venture. 	<ol style="list-style-type: none"> 1 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline mitigation and repair measures. 2 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline mitigation and repair measures. 3 The condition reference number 3(e) of Table 2 provides more information on this criterion. 4 The condition reference number 3(e) of Table 2 provides more information on this criterion. 5 Stakeholder interview addressed mitigation measures as documented within the GMMP. Additionally, the EWMMP 	GMMP V4 and GMMP V5 outline mitigation and repair measures within sections 3, 4 and 5. Stakeholder interview conducted provided additional understanding regarding the implementation of mitigation measures, particularly with the implementation of the EWMMP should certain triggers outlined with the GMMP be met. Further evidence provided in the relevant GMMP Memoranda and Annual Compliance Reports demonstrated implementation processes and compliance with regards to mitigation and repair.	Compliant

					<p>6 will be implemented should triggers be met. It is noted the EVWMP has not been triggered during the audit period. GMMP V4 Memorandum states updated GMMP will not likely result in new or increased impacts on any protected matter. Changes to GMMP V4 included:</p> <ul style="list-style-type: none"> • Updates to legislative requirements. • Updates to incorporate replacement groundwater monitoring bores; and • Updates to reflect cessation of construction phase activities. <p>7 GMMP V5 Memorandum states updated GMMP will not likely result in new or increased impacts on any protected matter. Changes to GMMP V5 included:</p> <ul style="list-style-type: none"> • Updates to the structure and content to simplify future implementation; and • Updates to reflect increased understanding of groundwater conditions of the project. 	The Independent Auditor considers this criterion to be compliant.	
3.13	Inclusion of a monitoring program within the GMMP	Sighting of a monitoring program within the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand how the monitoring program has been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 	<ol style="list-style-type: none"> 1 Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline the monitoring program. 2 Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline the monitoring program. 3 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 4 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 5 Stakeholder interview addressed implementation of the monitoring program. Evidence of monitoring results are included in Groundwater Monitoring Program Reports GME5 to GME13. 6 Groundwater Monitoring Program Reports GME5 to GME13 evidence results of periodic reviews of site data obtained through quarterly groundwater monitoring events. 	<p>GMMP V4 and GMMP V5 outline monitoring program within sections 2, 4 and 5.</p> <p>Stakeholder interview conducted provided additional understanding regarding the monitoring program which is undertaken on a quarterly basis. Evidence of monitoring results was provided and cover the audit period.</p> <p>The Annual Compliance Reports further demonstrates compliance of implementation of the monitoring program.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
3.14	Inclusion of measurable performance indicators within the monitoring program in the GMMP	Sighting of measurable performance indicators within the monitoring program in the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand how performance indicators have been measured	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 	<ol style="list-style-type: none"> 1 Section 2 <i>Methodology</i> in the GMMP V4 outline the performance indicators. 2 Section 2 <i>Methodology</i>, in the GMMP V5 outline the performance indicators. 3 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 4 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 5 Stakeholder interview addressed implementation of the monitoring program. Evidence of monitoring results are included in Groundwater Monitoring Program Reports GME5 to GME13. 6 Groundwater Monitoring Program Reports GME5 to GME13 evidence results of periodic reviews of site data obtained through quarterly groundwater monitoring events. 	<p>GMMP V4 and GMMP V5 outline measurable performance indicators within section 2.</p> <p>Stakeholder interview conducted provided additional understanding regarding the outlined parameters and performance indicators. Evidence of monitoring results was provided and covers the audit period.</p> <p>The Annual Compliance Reports further demonstrates compliance of implementation of the monitoring program.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
3.15	Inclusion of timing and frequency for monitoring against the performance indicators within the monitoring program in the GMMP	Sighting of timing and frequency for monitoring against the performance indicators within the monitoring program in the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand how the timing and frequency of performance indicators have been implemented.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 6. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 	<ol style="list-style-type: none"> 1 Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline the timing and frequency for monitoring. 2 Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline the timing and frequency for monitoring. 3 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 4 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report which confirms no trigger values resulting in unacceptable project-induced impact were reached. 5 Stakeholder interview addressed timing and frequency of monitoring program. Evidence of monitoring results are included in Groundwater Monitoring Program Reports GME5 to GME13. 6 Groundwater Monitoring Program Reports GME5 to GME13 evidence results of periodic reviews of site data obtained through quarterly groundwater monitoring events. 	<p>GMMP V4 and GMMP V5 outline timing and frequency of monitoring program in sections 2, 4 and 5.</p> <p>Stakeholder interview conducted provided additional understanding regarding the timing and frequency of the monitoring program, particularly with regards to review of monitoring results and data collection activities. Evidence of monitoring results was provided and covers the audit period.</p> <p>The Annual Compliance Reports further demonstrates compliance of implementation of the monitoring program.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	
3.16	Inclusion of trigger values for corrective actions within the monitoring program in the GMMP	Sighting of trigger values for corrective actions within the monitoring program in the GMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. 2. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 	<ol style="list-style-type: none"> 1 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline trigger values for corrective actions. 2 Section 3 <i>Monitoring Performance of Project Infrastructure</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline trigger values for corrective actions. 3 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 4 The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. 5 Groundwater Monitoring Program Reports GME5 to GME13 evidence results of periodic reviews of site data obtained through quarterly groundwater monitoring events. 	<p>GMMP V4 and GMMP V5 outline trigger values for corrective actions within sections 3, 4 and 5.</p> <p>The Annual Compliance Reports further demonstrates compliance of inclusion of trigger values for corrective actions.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant	

3.17	Inclusion of corrective actions, and commitments where trigger values are reached within the monitoring program in the GMMP	Sighting of corrective actions, and commitments where trigger values are reached within the monitoring program in the GMMP and assess evidence of implementation; and Completing stakeholder interviews to understand where trigger values were exceeded and what corrective actions were implemented.	<ol style="list-style-type: none"> GMMP V4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021, Level Crossing Removal Project. GMMP V5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023, Level Crossing Removal Project. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. Groundwater Monitoring Program Reports GME5 to GME13 (October 2021 – October 2022 and October 2022 – October 2023). 	<ol style="list-style-type: none"> Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V4 outline the monitoring program. Section 2 <i>Methodology</i>, Section 4 <i>Monitor Potential to Impact Edithvale Wetland</i> and Section 5 <i>Monitor Potential to Impact Groundwater Quality</i> in the GMMP V5 outline the monitoring program. The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. The condition reference number 3(f) of Table 2 states Appendix B: Groundwater Monitoring Program Report within the GMMP includes a factual monitoring report. Stakeholder interview addressed implementation of the monitoring program. Evidence of monitoring results are included in Groundwater Monitoring Program Reports GME5 to GME13. Groundwater Monitoring Program Reports GME5 to GME13 evidence results of periodic reviews of site data obtained through quarterly groundwater monitoring events. 	<p>GMMP V4 and GMMP V5 outline corrective actions and commitments where trigger values are reached within sections 2, 4 and 5.</p> <p>Stakeholder interview conducted provided additional understanding regarding the monitoring program. In particular, it is noted no corrective actions were undertaken as trigger levels were not met. Implementation of the EWMMP was not required.</p> <p>The Annual Compliance Reports further demonstrates compliance of inclusion of corrective actions and commitments.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
EPBC Approval Condition 4.		<i>"The approval holder must submit an Edithvale Wetlands Monitoring and Mitigation Plan for the Minister's approval that ensures impacts to wetlands as a result of the action are monitored, and corrective actions implemented if applicable trigger values are reached."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
4.1	Minister approval of the Edithvale Wetlands Monitoring and Mitigation Plan (EWMMP)	Sighting the Minister's letter of approval of the EWMMP alongside the approved version of the EWMMP that was in place during the audit period.	<ol style="list-style-type: none"> Approval from Minister of the Edithvale Wetlands Monitoring and Mitigation Plan V1, dated 2 December 2019. Email from LXR providing notice to the Department of the updated EWMP V2, dated 18 June 2020. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> Approval from the Department of the EWMMP states V1, dated 31 October 2019, was approved. The EWMMP was updated to V2 and evidence of submission of the plan was sighted, however approval was not sighted. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V1 approval was sighted, however the Independent Auditor had not sighted the Minister's approval for EWMMP V2 as it was not made available.</p> <p>Stakeholder interview determined the Department may not have provided a response confirming receipt and approval. In this instance, the Independent Auditor accepts submission of EWMMP V2 as evidence.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
EPBC Approval Condition 5.		<i>"The approval holder must not commence the action unless the Minister has approved the Edithvale Wetlands Monitoring and Mitigation Plan in writing. The Edithvale Wetlands Monitoring and Mitigation Plan approved by the Minister must be implemented."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.1	Commencement of the Action	Comparison between the date of the action commencement, and the date of the Minister's letter of approval for the EWMMP.	<ol style="list-style-type: none"> Commencement of Action letter from the Department, dated 20 October 2020. Approval from Minister of the Edithvale Wetlands Monitoring and Mitigation Plan V1, dated 2 December 2019. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. Email from LXR providing notice to the Department of the updated EWMP V2, dated 18 June 2020. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> Commencement of Action letter confirms commencement of action occurred 13 October 2020. Approval from Minister of EWMMP V1 occurred prior to Commencement of Action. EWMMP V2 states <i>"Implementation of this Plan will commence immediately on the identification of groundwater triggers being met through the GWMP"</i>. The EWMMP was updated to V2 and evidence of submission of the plan was sighted, however approval was not sighted. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>Commencement of Action occurred after the approval of the EWMMP V1.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
5.2	Implementation of the approved EWMMP	Comparison of the version number of the EWMMP approved by the Minister, and the version of the EWMMP used in implementation during the audit period.	<ol style="list-style-type: none"> Commencement of Action letter from the Department, dated 20 October 2020. Approval from Minister of the Edithvale Wetlands Monitoring and Mitigation Plan V1, dated 2 December 2019. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. Email from LXR providing notice to the Department of the updated EWMP V2, dated 18 June 2020. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> Commencement of Action letter confirms commencement of action occurred 13 October 2020. Approval from Minister of EWMMP V1 occurred prior to Commencement of Action. EWMMP V2 is the current version, as published on the LXR website. The EWMMP was updated to V2 and evidence of submission of the plan was sighted, however approval was not sighted. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. Annual Compliance Report No 2. outlines compliance, as no trigger values were reached during the audit period and thus the EWMMP was not implemented. Annual Compliance Report No 3. outlines compliance, as no trigger values were reached during the audit period and thus the EWMMP was not implemented. 	<p>EWMMP V2 is the current version. As noted in stakeholder interviews, the EWMMP was not triggered (as defined in the GWMP) and thus not implemented during the audit period.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
EPBC Approval Condition 6.		<p><i>"6. The Edithvale Wetlands Monitoring and Mitigation Plan must be consistent with the relevant Environmental Performance Requirement as approved the Victorian Minister, and must include:</i></p> <p><i>a. The Edithvale Wetlands Monitoring and Mitigation Plan environmental objectives, relevant EPBC Act protected matter/s and a table setting out where it addresses the EPBC Act approval conditions applicable to the Edithvale Wetlands Monitoring and Mitigation Plan;</i></p> <p><i>b. A table of commitments made in the Edithvale Wetlands Monitoring and Mitigation Plan to achieve the objectives, and reference to where each commitment is detailed in the Edithvale Wetlands Monitoring and Mitigation Plan;</i></p> <p><i>c. Reporting and review mechanisms, and documentation standards to demonstrate compliance with the Edithvale Wetlands Monitoring and Mitigation Plan;</i></p> <p><i>d. An assessment of risks to achieving Edithvale Wetlands Monitoring and Mitigation Plan environmental objectives and risk management strategies that will be applied;</i></p> <p><i>e. Impact avoidance, mitigation and/or repair measures, and their timing; and</i></p> <p><i>f. A monitoring program, which must include:</i></p> <p><i>i. measurable performance indicators;</i></p> <p><i>ii. the timing and frequency of monitoring to detect changes in the performance indicators;</i></p> <p><i>iii. trigger values for corrective actions; and</i></p> <p><i>iv. corrective actions, and commitments to implement these actions if trigger values are reached."</i></p>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding

6.1	Consistency with approved Environmental Performance Requirements (EPR)	Comparison of the relevant EPR approved by the Victorian Minister in the applicable Environmental Management Framework (or equivalent) with contents of the EWMMP.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Projects EMF dated December 2018. 3. Email from LXRPP providing notice to the Department of the updated EWMP V2, dated 18 June 2020. 4. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 5. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. EWMMP V2 is the current version, as published on the LXRPP website. 2. EMF outlines environmental performance conditions under FF7. 3. Table 2 in the Annual Compliance Report No 2. Item 6(a) compliance, as no trigger values were reached during the audit period and thus the EWMMP was not implemented. 4. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 2. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 5. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 3. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 	<p>EPR (FF7) requirements outlined within the Environmental Management Framework are aligned with the EWMMP.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.2	Inclusion of environmental objectives within the EWMMP	Sighting of environmental objectives within the EWMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. Section 3 Objectives of the EWMMP V2 outlines environmental objectives and commitments in Table 1. 2. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 2. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 3. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 3. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 	<p>Environmental objectives are addressed within EWMMP V2 and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.3	Inclusion of relevant EPBC Act protected matter/s within the EWMMP	Sighting of the EPBC Act protected matter/s included within the EWMMP and assess for completeness.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 4. Table 7 EPBC Act approval conditions in Appendix A outlines inclusion of relevant EPBC Act protected matters. 5. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 2. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906, including protected matters. 6. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 3. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906, including protected matters. 	<p>EPBC Act protected matters are outlined within EWMMP V2 and compliance of this condition is demonstrated in both Annual Compliance Reports.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.4	Inclusion of a table addressing applicable EPBC Act approval conditions within the EWMMP	Sighting of a table within the EWMMP addressing the applicable EPBC Act approval conditions and comparison of the project's EPBC Act approval conditions and those within the aforementioned table; and Assessment of the table within the EWMMP addressing the applicable EPBC Act approval conditions for completeness.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. Table 7 EPBC Act approval conditions in Appendix A outlines inclusion of all relevant EPBC Act approval conditions. 2. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 2. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 3. The condition reference number 6(a) of Table 2 states Annual Compliance Report No 3. outlines compliance with FF7 and Conditions 4 – 6 of the EPBC Approval 2017/7906. 	<p>Table outlining EPBC Act approval conditions is included within EWMMP V2 and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.5	Inclusion of a table outlining commitments made to achieve objectives within the EWMMP	Sighting of a table within the EWMMP outlining the commitments to achieve the environmental objectives and assess evidence of implementation; Sighting of references of the aforementioned commitments within the EWMMP and review their details for completeness; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how commitments made have been implemented.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXRPP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 3 Objectives includes Table 1 which outlines all relevant environmental objectives and the corresponding commitments to achieve objectives. In particular: <ul style="list-style-type: none"> • Objective 1 – Establishing process to Assess Groundwater Extending to Edithvale Wetland, will commence if trigger is met. • Objective 2 – Defining an Approach to Review and Analyse Monitoring Data, is undertaken through data collection should the EWMMP be implemented. • Objective 3 – Identification of Mitigation Measures, is to come into effect should the trigger values be reached. 2. The condition reference number 6(b) of Table 2 in the Annual Compliance Report No. 2 summarises commitments in accordance with the EWMMP. 3. The condition reference number 6(b) of Table 2 in the Annual Compliance Report No. 3 summarises commitments in accordance with the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>Table outlining commitments made to achieve environmental objectives is included within EWMMP V2 and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.6	Inclusion of reporting mechanisms to demonstrate compliance within the EWMMP	Sighting of reporting mechanisms within the EWMMP and assess evidence of implementation; and Completing stakeholder interviews to further understand how reporting mechanisms have been implemented.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXRPP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 8 Reporting, Notification and Audit outlines reporting mechanisms to be implemented if the plan is triggered. This includes notification, non-compliances, and audits. 2. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 2. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, reporting mechanisms were not implemented. 3. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 3. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, reporting mechanisms were not implemented. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines reporting mechanisms and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.7	Inclusion of review mechanisms to demonstrate compliance within the EWMMP	Sighting of review mechanisms within the EWMMP and assess evidence of implementation; and Completing stakeholder interviews to further understand how review mechanisms have been implemented	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXRPP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 10 Implementation of the Plan outlines review mechanisms to be implemented if the plan is triggered. 2. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 2. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 3. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 3. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines review mechanisms and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant

6.8	Inclusion of documentation standards to demonstrate compliance within the EWMMP	Sighting of documentation standards within the EWMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> 1. Section 8 <i>Reporting, Notification and Audit</i> and Section 10 <i>Implementation of the Plan</i> outlines documentation standards. 2. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 2. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 3. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 3. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 	<p>EWMMP V2 outlines documentation standards and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.9	Inclusion of a risk assessment assessing the achievability of environmental objectives within the EWMMP	Sighting of a risk assessment output within the EWMMP; and Completing stakeholder interviews to understand the risk assessment process undertaken.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Appendix D <i>Risks to the Plan</i> outline risks to implementation of the plan in Table 9. Risks include (but are not limited to) dynamic system, Mordialloc Bypass influencing hydrology of Edithvale Wetland, Catchment-related influences, and Co-operation of management authorities. 2. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 2. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 3. The condition reference number 6(c) of Table 2 of Annual Compliance Report No 3. states compliance is measured through trigger values being met. As no triggers were met during the reporting period, review mechanisms were not implemented. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines risk assessment of achievability of environmental objectives and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.10	Inclusion of risk management strategies to address the risk assessment within the EWMMP	Sighting of the risk management strategies to address the risk assessment within the EWMMP and assess evidence of implementation; and Completing stakeholder interviews to understand how the risk management strategies were developed following the risk assessment process undertaken.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Appendix D <i>Risks to the Plan</i> outline risks to implementation of the plan and relevant risk management strategies in Table 9. Risk strategies include (but are not limited to) maintenance of existing hydrological regime, ensuring surface water quality data is related to rainfall, ensuring access for monitoring in a timely manner, and collaboration with Melbourne Water. 2. The condition reference number 6(d) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Appendix D of the EWMMP. 3. The condition reference number 6(d) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Appendix D of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines risk management strategies to achieve environmental objectives and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.11	Inclusion of impact avoidance measures and their timing within the EWMMP	Sighting of the impact avoidance measures and the associated timing within the EWMMP and assess evidence of implementation; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how impact avoidance measures made have been implemented.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 6 <i>Mitigation</i> outlines impact avoidance measures. 2. The condition reference number 6(e) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 6 of the EWMMP. 3. The condition reference number 6(e) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 6 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines impact avoidance and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.12	Inclusion of mitigation and/or repair measures and their timings within the EWMMP	Sighting of mitigation and/or repair measures and their timings within the EWMMP and assess evidence of implementation; and Completing stakeholder interviews and a site inspection (if applicable) to further understand how mitigation and/or repair measures made have been implemented.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 6 <i>Mitigation</i> outlines mitigation and repair measures. 2. The condition reference number 6(e) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 6 of the EWMMP. 3. The condition reference number 6(e) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 6 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines mitigation and repair measures and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.13	Inclusion of a monitoring program within the EWMMP	Sighting of a monitoring program within the EWMMP; and Completing stakeholder interviews to understand how the monitoring program has been implemented	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 7 <i>Summary of Monitoring and Mitigation Actions</i> outlines monitoring program. 2. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 7 of the EWMMP. 3. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 7 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines monitoring program and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.14	Inclusion of measurable performance indicators within the monitoring program in the EWMMP	Sighting of measurable performance indicators within the monitoring program in the EWMMP and assess evidence of implementation; and Completing stakeholder interviews to understand how performance indicators have been measured	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 7 <i>Summary of Monitoring and Mitigation Actions</i> outlines monitoring program. Table 4 includes performance indicators. 2. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 7 of the EWMMP. 3. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 7 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines performance indicators and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
6.15	Inclusion of timing and frequency for monitoring against the performance indicators within the monitoring program in the EWMMP	Sighting of timing and frequency for monitoring against the performance indicators within the monitoring program in the EWMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 4. Stakeholder interview with LXR, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 7 <i>Summary of Monitoring and Mitigation Actions</i> outlines monitoring program. Table 4 includes timing and frequency for monitoring against performance indicators. 2. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 7 of the EWMMP. 3. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 7 of the EWMMP. 	<p>EWMMP V2 outlines timing and frequency for monitoring against performance indicators and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p>	Compliant

					4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period.	The Independent Auditor considers this criterion to be compliant.	
	6.16	Inclusion of trigger values for corrective actions within the monitoring program in the EWMMP	Sighting of trigger values for corrective actions within the monitoring program in the EWMMP and assess evidence of implementation.	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 4. Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 7 <i>Summary of Monitoring and Mitigation Actions</i> outlines monitoring program. Table 4 includes trigger for habitat monitoring or mitigation. 2. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 7 of the EWMMP. 3. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 7 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines trigger values for habitat monitoring or mitigation and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
	6.17	Inclusion of corrective actions, and commitments where trigger values are reached within the monitoring program in the EWMMP	<p>Sighting of corrective actions, and commitments where trigger values are reached within the monitoring program in the EWMMP and assess evidence of implementation; and</p> <p>Completing stakeholder interviews to understand where trigger values were exceeded and how corrective actions were implemented.</p>	<ol style="list-style-type: none"> 1. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance 4. Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Section 6 <i>Mitigation</i> outline process to undertake corrective actions and commitments where trigger values are reached within the monitoring program. 2. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 2. states compliance is demonstrated in Section 6 of the EWMMP. 3. The condition reference number 6(f) of Table 2 of Annual Compliance Report No 3. states compliance is demonstrated in Section 6 of the EWMMP. 4. Stakeholder interview confirmed EWMMP was not triggered and therefore not implemented during the audit period. 	<p>EWMMP V2 outlines process to undertake corrective actions and commitments and compliance of this condition is also addressed within the Annual Compliance Reports.</p> <p>Stakeholder interview confirms EWMMP was not triggered and therefore not implemented.</p> <p>The Independent Auditor considers this criterion to be compliant.</p>	Compliant
B - Standard administrative conditions	EPBC Approval Condition 7		"The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action."				
			Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	7.1	Notification notices of the commencement of action to the Department	Comparison between the date of notification notice of action commencement to the Department, and the date of the action commencement and consideration if notification occurred within 10 business days	N/A	N/A	Notification only required to be provided once. This EPBC Approval Condition was tested in Audit 1 and found to be compliant.	Compliant
	EPBC Approval Condition 8		"If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister."				
			Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	8.1	Minister approval of action commencement where 5 years after the date of the approval	<p>Sighting the Minister's letter of approval of action commencement and consideration if commencement of the action occurred within 5 years from the date of the approval.</p> <p>Consideration if written agreement from the Minister was required if commencement of the action occurred after 5 years from the date of the approval (if applicable).</p>	Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024.	N/A	This EPBC Approval Condition was tested in Audit 1. This EPBC Approval Condition is not applicable.	Compliant
	EPBC Approval Condition 9		"The approval holder must maintain accurate and complete compliance records. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media."				
			Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	9.1	Maintenance of compliance records	Sighting compliance records (i.e., records associated with the GMMP and EWMMP as described above and other records as applicable) and assess evidence of implementation.	1. Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024.	1. Document management system sighted during stakeholder interview. Demonstrated filing system implemented to manage and store records of maintenance and compliance. All requested items were provided.	The documents sighted applicable to the audit period demonstrated maintenance of relevant compliance records.	Compliant
	EPBC Approval Condition 10		"If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
10.1	Submission details were requested by the Department	Comparison between the Department's written requests (in terms of timeframe and documents requested) and the approval holder's submitted electronic copies of records and the date those were provided (if applicable).	1. Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024.	1. Stakeholder interview determined the Department did not make any written requests for copies of compliance records during the audit period.	As no compliance records were requested by the Department, the Independent Auditor considers this criterion to be compliant.	Compliant	

EPBC Approval Condition 11		"11. The approval holder must: a. submit plans electronically to the Department for approval by the Minister; b. publish each plan on the website within 20 business days of the date the plan is approved by the Minister or of the date a revised action management plan is submitted to the Minister, unless otherwise agreed to in writing by the Minister; c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and d. keep plans published on the website until the end date of this approval."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
11.1	Electronic submission of plans for Minister's approval	Sighting of electronic submission details of plans to the Department for Minister's approval.	<ol style="list-style-type: none"> Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. Email from Senior Assessment Officer at the Department dated 4 January 2022, confirming acceptance of GMMP V4. Email from Assistant Director at the Department, dated 8 January 2024, confirming acceptance of GMMP V5. Approval from Minister of the Edithvale Wetlands Monitoring and Mitigation Plan V1, dated 2 December 2019. Email from LXRP providing notice to the Department of the updated EWMP V2, dated 18 June 2020 	N/A	All submissions of plans to the Minister for approval were electronic. The Independent Auditor considers this criterion to be compliant.	Compliant
11.2	Publication of plans within the approved timeframe	Comparison between the publication date of an approved plan on the website and the Minister's approval date of that plan (or the date of revised action management plan submission or another date agreed with the Minister).	<ol style="list-style-type: none"> Email from Senior Assessment Officer at the Department dated 4 January 2022, confirming acceptance of GMMP V4. Webpage history of edits. 	<ol style="list-style-type: none"> GMMP V4 approved 4 January 2022. Webpage history of edits evidence GMMP V4 uploaded to the website on 17 January 2022. 	Condition 11 of the Approval requires plans must be published within 20 business days of the Plan's approval by the Minister, or the date a revised RAMP is submitted to the Minister. It is noted the audit period is only applicable to publication of GMMP V4. GMMP V4 was approved by the Minister on 4 January 2022 and published on 17 January 2022. This is within the required timeframe. The Independent Auditor considers this criterion to be compliant.	Compliant
11.3	Exclusion or redaction details of sensitive ecological data	Sighting of exclusion or redaction details of sensitive ecological data from published or public plans.	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit.	N/A	Not Applicable
11.4	Maintaining publication of approved plans	Sight Minister approved plans on the website (i.e., plans must be kept on website until 1 November 2033).	<ol style="list-style-type: none"> Webpage history of edits. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> History of edits demonstrates publication of approved plans remain on the website. Stakeholder interview determined approval plans remain on the website until subsequent versions are available for publication. 	The Independent Auditor considers this criterion to be compliant.	Compliant
EPBC Approval Condition 12		"The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and meta data required under a plan is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
12.1	Preparation of relevant data in accordance with the Department's Guidelines	Comparison between prepared monitoring data (including sensitive ecological data), surveys, maps, and other spatial and meta data required under a plan and the Department's Guidelines for biological survey and mapped data (2018).	<ol style="list-style-type: none"> GMMP 4 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 23 December 2021. GMMP 5 Edithvale and Bonbeach Groundwater Monitoring and Management Plan, dated 22 September 2023. Edithvale Wetland Monitoring and Mitigation Plan V2, dated 16 June 2020. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> GMMP V4 does not reference the Department's Guidelines for biological survey and mapped data (2018). GMMP V5 does not reference the Department's Guidelines for biological survey and mapped data (2018). EWMP V2 references Department's Guidelines for biological survey and mapped data (2018). Stakeholder interviews determined content included within GMMP V4 and GMMP V5 follow Department's Guidelines for biological survey and mapped data (2018). 	Although the guidelines are not directly referenced within the GMMP, through stakeholder interview it was determined sufficient alignment with the guidelines. The Independent Auditor considers this criterion to be compliant.	Compliant
12.2	Submission of data in accordance with the requirements of the plan	Comparison between submission details of monitoring data (including sensitive ecological data), surveys, maps, and other spatial and meta data required under a plan and submission requirements of the plan	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit.	N/A	Not Applicable
EPBC Approval Condition 13		"13. The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must: a. publish each compliance report on the website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on the website within five business days of the date of publication; c. keep all compliance reports publicly available on the website until this approval expires; d. exclude or redact sensitive ecological data from compliance reports published on the website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. Note: Compliance reports may be published on the Department's website."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
13.1	Preparation of a compliance report every 12 months following action commencement date	Comparison of the date of action commencement or that agreed in writing by the Minister and the dates of subsequent compliance reports.	<ol style="list-style-type: none"> Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> Annual Compliance Report No.2 covers 13 October 2021 to 12 October 2022. Annual Compliance Report No. 3 covers 13 October 2022 to 12 October 2023. 	As commencement of action occurred on 13 October 2020 and preparation of compliance reports are evidenced to have occurred every 12 months following action commencement date, the Independent Auditor considers this criterion to be compliant.	Compliant
13.2	Publication of prepared compliance reports within 60 business days following the relevant 12-month period	Sight the publication date of the compliance report for the audit period.	<ol style="list-style-type: none"> Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.2, dated 9 March 2023, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 	<ol style="list-style-type: none"> Annual Compliance Report No. 2 indicates date of preparation as 21 December 2022. Annual Compliance Report No. 3 indicates date of preparation as 22 December 2023. Email indicates Annual Compliance Report was completed 21 December 2022, however not 	The publication of Annual Compliance Report No. 3 occurred 20 days following the date of preparation of the report.	Not Compliant

			<ol style="list-style-type: none"> 2. Edithvale and Bonbeach Level Crossing Removal Project: Annual Compliance Report No.3, dated 9 January 2024, signed by Senior Manager, Land Planning and Environment, Southern Program Alliance. 3. Email providing notification of Annual Compliance Report No. 2 dated 26 May 2023. 4. Email providing notification of Annual Compliance Report no. 3 dated 11 January 2024. 5. Screenshot of Annual Compliance Report No. 2 uploaded to website. 6. Screenshot of Annual Compliance Report No. 3 uploaded to website. 7. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 4. published on LXRP website until 9 March 2023. It is noted this time period is 65 business days. Email indicates Annual Compliance Report was prepared 22 December 2023, and published on LXRP website on 11 January 2024. It is noted this time period is 20 days. 5. Annual Compliance Report No. 2 uploaded 23 March 2023. 6. Annual Compliance Report No. 3 uploaded 11 January 2024. 7. Stakeholder interviews determined resourcing constraints resulted in this non-compliance. 	The publication of Annual Compliance Report No. 2 occurred 65 days following the date of preparation of the report. The Independent Auditor considers this criterion to be non-compliant, as the publication of Annual Compliance Report No. 2 is greater than 60 days.	
13.3	Email notification to the Department of compliance report publication within five (5) business days of the date of publication	Comparison between publication date of compliance report for the audit period and email notification to the Department of that publication.	<ol style="list-style-type: none"> 1. Email providing notification of Annual Compliance Report No. 2 dated 26 May 2023. 2. Email providing notification of Annual Compliance Report no. 3 dated 11 January 2024. 	<ol style="list-style-type: none"> 1. Email indicates Annual Compliance Report was published on LXRP website on 9 March 2023. Date of email is 26 May 2023. It is noted this time period is 54 business days. 2. Email indicates Annual Compliance Report was published on LXRP website on 11 January 2024. Date of email is 11 January 2024. 	The email to the Department providing notification Annual Compliance Report No. 2 was uploaded to the website occurred 54 business days after publication. The Independent Auditor considers this criterion to be non-compliant, as the notification of the publication of Annual Compliance Report No. 2 is greater than 5 business days.	Not Compliant
13.4	Maintaining publication of compliance reports on website until 1 November 2033	Confirm that compliance report for the audit period remains on the website (i.e., reports must be kept on website until 1 November 2033).	<ol style="list-style-type: none"> 1. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 	<ol style="list-style-type: none"> 1. Stakeholder interviews determined compliance reports are planned to remain on the website until 1 November 2033. 	All compliance reports are currently on the website. It is noted LXRP have indicated the reports will remain online until 1 November 2033. The Independent Auditor considers this criterion to be compliant.	Compliant
13.5	Exclusion or redaction details of sensitive ecological data	Sighting of exclusion or redaction details of sensitive ecological data from compliance report for the audit period.	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit.	N/A	Not Applicable
13.6	Submission of full compliance report to the Department within five (5) business days of the date of publication, where data was excluded from published version.	Comparison between publication dates of compliance report for the audit period where sensitive ecological data was excluded and the dates of full compliance report submissions to the Department	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit.	N/A	Not Applicable
EPBC Approval Condition 14		<p><i>"14. The approval holder must notify the Department in writing of any incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</i></p> <p><i>a. the condition which is or may be in breach; and</i></p> <p><i>b. a short description of the incident and/or non-compliance."</i></p>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
14.1	Timely notification of incidents or non-compliances with conditions or commitments made in plans	Sight details of any incidents or non-compliances that occurred within the audit period and sight notifications submitted to the Department to assess if they were made within two (2) business days.	<ol style="list-style-type: none"> 1. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 2. SPA Incident Register 	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
14.2	Inclusion of condition breached in the notification	Sight notifications associated with any incidents or non-compliances across the audit period and assess if details of the condition breached were included.	<ol style="list-style-type: none"> 1. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 2. SPA Incident Register 	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
14.3	Inclusion of description of incident and/or non-compliance in the notification	Sight notifications associated with any incidents or non-compliances across the audit period and assess if details of the incidents or non-compliance were included.	<ol style="list-style-type: none"> 1. Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024. 2. SPA Incident Register 	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
EPBC Approval Condition 15		<p><i>"15. The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</i></p> <p><i>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</i></p> <p><i>b. the potential impacts of the incident or non-compliance; and</i></p> <p><i>c. the method and timing of any remedial action that will be undertaken by the approval holder."</i></p>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
15.1	Timely notification of full details of incidents or non-compliances with conditions or commitments made in plans	Sight details of any incidents or non-compliances that occurred within the audit period and sight notifications submitted to the Department to assess if full details of incidents or non-compliance were made within 10 business days.	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
15.2	Detailed inclusion of corrective action or investigation taken or planned in the notification	Sight detailed notifications associated with any incidents or non-compliances across the audit period and assess if details of the corrective action or investigation taken or planned were included.	Stakeholder interview with LXRP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable

15.3	Detailed inclusion of the potential impacts of incident or non-compliance in the notification	Sight detailed notifications associated with any incidents or non-compliances across the audit period and assess if details of the potential impacts of incident or non-compliance were included.	Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
15.4	Detailed inclusion of method and timing of remedial action to be undertaken in the notification	Sight detailed notifications associated with any incidents or non-compliances across the audit period and assess if details of the method and timing of remedial action to be undertaken were included.	Stakeholder interview with LXP, GHD-AECOM, and WSP conducted on 11 June 2024.	Stakeholder interview determined this criterion is not applicable to the audit. No reportable incidents.	N/A	Not Applicable
EPBC Approval Condition 16		<i>"The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12-month period from commencement of the action and for every subsequent 24 month period until this approval expires, or as requested in writing by the Minister."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
16.1	Independent Audits undertaken for compliance with the conditions	Comparison between the action commencement date, Minister's approval end date and the dates of independent audits of compliance conducted.			The Independent Auditor considers this criterion to be compliant.	Compliant
EPBC Approval Condition 17		<i>"For each independent audit, the approval holder must: a. provides the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
17.1	Notification of the independent auditor to the Department	Sighting notification details of independent auditor (name and qualifications) notification to the Department.	EPBC Act Approval Independent Audit - Level Crossing Removal Project (LXP) Edithvale and Bonbeach Level Crossing Removal, Auditor Competence and Audit Criteria/Methodology Package, dated 19 April 2024.	EPBC Act Approval Independent Audit – Auditor Competence and Audit Criteria/Methodology Package includes Auditor CVs and EPA-appointed auditor certification.	The Independent Auditor considers this criterion to be compliant.	Compliant
17.2	Notification of the draft audit criteria to the Department	Sighting notification details of draft audit criteria notification to the Department.	Email to the Department from LXP providing notification of draft audit criteria, dated 17 April 2024.	Email confirms notification provided to the Department. Additional updates were required to outline Auditor's previous role(s) on Audit 1.	The Independent Auditor considers this criterion to be compliant.	Compliant
17.3	Commencement of the audit within the approved timeframe	Comparison between the independent audit commencement date and the date of audit criteria approval by the Department.	1. Email from the Department confirming approval of the Auditor(s), dated 13 May 2024.	1. Email confirms approval of the Auditors on 13 May 2024. Audit commenced 11 June 2024, following approval from the Department.	The Independent Auditor considers this criterion to be compliant.	Compliant
17.4	Submission of the audit report within the approved timeframe	Comparison of the audit report's submission date and the timeframe specified in the audit criteria approval by the Department.	EPBC Act 1999 Approval - Audit Report, dated 22 April 2024 (LXP-EPBC-Act-Approval-Independent-Audit-Audit-Report-for-Department-Approval-issued-22-April-2024.pdf (bigbuild.vic.gov.au))	Audit report confirms publication of Independent Auditor's report on 23 April 2023.	Audit report uploaded 1 day following Department approval. The Independent Auditor considers this criterion to be compliant.	Compliant
EPBC Approval Condition 18		<i>"The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
18.1	Publication of the approved audit report within the specified timeframe by the Department	Sight the published audit report on the website, assessing if it was published within 10 business days of the Department's approval of the audit report and confirm it remains on the website (i.e., reports must be kept on website until 1 November 2033).	EPBC Act 1999 Approval - Audit Report, dated 22 April 2024 (LXP-EPBC-Act-Approval-Independent-Audit-Audit-Report-for-Department-Approval-issued-22-April-2024.pdf (bigbuild.vic.gov.au))	Audit report confirms publication of Independent Auditor's report on 23 April 2023.	Audit report uploaded 1 day following Department approval. The Independent Auditor considers this criterion to be compliant.	Compliant
EPBC Approval Condition 19		<i>"The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions one or four, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
19.1	Submission of Section 143A of the EPBC Act application for a variation of the action management plan for Minister's approval	Sight Minister approval of Section 143A of the EPBC Act application for any variations to the GMMP and EWMP made during the audit period together with the approved, revised GMMP and/or EWMP.	N/A	N/A	Not applicable as no application for a variation of the action management plan was submitted.	Not Applicable
19.2	Implementation of the revised action management plan approved by the Minister	Sight details of implementation of the revised GMMP and/or EWMP during the audit period.	N/A	N/A	Not applicable as no application for a variation of the action management plan was submitted.	Not Applicable
EPBC Approval Condition 20		<i>"The approval holder may choose to revise an action management plan approved by the Minister under condition one or four, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact."</i>				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding

20.1	Performing an impact assessment of the revised action management plan and/or notification to the Department (EPBC Approval Condition 19)	For any GMMP or EWMMP revised during the audit period and not submitted for approval under section 143A of the EPBC Act, sight documentary evidence that the revised GMMP and/or EWMMP would not have resulted in a new or increased impact.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
EPBC Approval Condition 21		<p>"21. If the approval holder makes the choice under condition 20 to revise an action management plan without submitting it for approval, the approval holder must:</p> <p>a. notify the Department in writing that the approved action management plan has been revised and provide the Department with:</p> <p>i. an electronic copy of the RAMP;</p> <p>ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</p> <p>iii. an explanation of the differences between the approved action management plan and the RAMP;</p> <p>iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and</p> <p>v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department.</p> <p>b. subject to condition 23, implement the RAMP from the RAMP implementation date."</p>				
	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
21.1	Notification of revision to the action management plan	Sight notification details to the Department of revisions to the approved action management plan, where applicable.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.2	Inclusion of the RAMP in the notification	Sight an electronic copy of the RAMP in the notification to the Department, where applicable.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.3	Inclusion of a separate RAMP with tracked changes in the notification	Sight an electronic copy of the RAMP with tracked changes in the notification to the Department, where applicable.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.4	Inclusion of explanations of the updates made in the RAMP in the notification	Sight explanations of the differences between the approved action management plan and the RAMP in the notification to the Department.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.5	Inclusion of reasons for the action under the RAMP to not have new or increased impact in the notification	Sight reasons (such as an impact assessment as stated in EPBC Approval Condition 20) to consider taking action under the RAMP to not have a new or increased impact in the notification to the Department.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.6	Inclusion of the commencement date of action under the RAMP with consideration to the approved or agreed timeframe in the notification	Sight details of the commencement date of action under the RAMP to confirm that it was not implemented until at least 20 business days after the notification to the Department.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
21.7	Implementation of the RAMP from the approval date	Sight evidence that the RAMP was implemented following the commencement date of action.	N/A	N/A	Not applicable as approval holder did not revise an action management plan without submitting for approval.	Not Applicable
EPBC Approval Condition 22		<p>"The approval holder may revoke its choice to implement a RAMP under condition 20 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 20, the approval holder must implement the previous action management plan approved by the Minister."</p>				
	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
22.1	Decision to revoke a RAMP	Sight written notice to Department of any RAMPs revoked by LXR within the audit period.	N/A	N/A	No decision to revoke a RAMP.	Not Applicable
22.2	Notification to the Department of RAMP revocation	Sight written notice to Department of any RAMPs revoked by LXR within the audit period.	N/A	N/A	No notification required as RAMP not revoked.	Not Applicable
22.3	Implementation of previously approved action management plan	Sight evidence that the previous action management plan approved by the Minister was implemented.	N/A	N/A	No implementation of previously approved action management plan.	Not Applicable
EPBC Approval Condition 23		<p>"23. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a. condition 20 does not apply, or ceases to apply, in relation to the RAMP; and</p> <p>b. the approval holder must implement the action management plan specified by the Minister in the notice."</p>				
	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
23.1	Notification by the Minister of a new or increased impact from action under the RAMP	Sighting of Minister's notices where the Minister was satisfied that the taking of the action was likely to result in a new or increased impact.	N/A	N/A	No notification by the Minister of a new or increased impact from action under the RAMP.	Not Applicable
23.2	Cancellation of action of the RAMP under condition 20	Sight evidence that the previous action management plan approved by the Minister was implemented.	N/A	N/A	No cancellation of action of the RAMP.	Not Applicable

EPBC Approval Condition 24		"At the time of giving the notice under condition 23, the Minister may also notify that for a specified period of time, condition 20 does not apply for one or more specified action management plans. Note: conditions 20, 21, 22 and 23 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
24.1	Notification by the Minister for condition 20 RAMP's invalidation timeframe	Sighting Minister's notice of condition 20 RAMP's specified invalidation period alongside with any changes specified to the action management plan during the invalidation period	N/A	N/A	No notification by the Minister for condition 20 RAMP's invalidation timeframe.	Not Applicable
24.2	Implementation of the RAMP under the validation period as per the Minister's notice	Comparison between the action management plans being implemented during the specified invalidation period as per the notice, the changes necessary to the RAMP during this period as per the notice and the RAMP prior to the notice	N/A	N/A	No implementation of the RAMP under validation period as per Minister's notice.	Not Applicable
EPBC Approval Condition 25		"Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data."				
		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
25.1	Notification to the Department of action completion and its data within the approved timeframe	Not applicable to the audit period.	N/A	N/A	Not applicable to the audit time period.	Not Applicable
25.2	Inclusion of completion details such as relevant data in the notification to the Department	Not applicable to the audit period.	N/A	N/A	Not applicable to the audit time period.	Not Applicable
C - Definitions	EPBC Approval Condition 26		"26. In these conditions, except where contrary intention is expressed, the following definitions are used: a. Business days means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action. ... t. Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public."			
			Verification Method	Evidence	Documents Sighted	Determination
	Note: Part C conditions consist of definitions. There are no deviations of the noted definitions and consequently Part C will not be included as criteria.					

NOTE:

1. Unless otherwise specified (such as via emails), notifications to the Department/Minister had to be in writing.



Doris Pallozzi

Project and Technical Lead (EPA-Accredited/Environmental Auditor)

Partner

+61 (3) 9288 6171

Amanda McAlister

Project Lead/Lead Environmental Auditor

Manager

+61 (3) 866 8371

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