



**SUBURBAN  
RAIL LOOP**

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

**May to November 2023**

# Table of Contents

<b>1. Introduction .....</b>	<b>6</b>
1.1. Role of the Independent Environmental Auditor .....	6
1.2. Report purpose and structure .....	6
<b>2. Audit program .....</b>	<b>7</b>
2.1. Objectives .....	7
2.2. Scope .....	7
2.3. Risk based approach .....	8
2.4. Compliance status.....	8
2.5. Corrective actions .....	8
<b>3. Early Works audit activities .....</b>	<b>9</b>
<b>4. Early Works audit findings.....</b>	<b>9</b>
4.1. Environmental Performance Requirements .....	9
4.1.1. Environmental management.....	9
4.1.2. Aboriginal cultural heritage .....	9
4.1.3. Air quality .....	9
4.1.4. Arboriculture.....	10
4.1.5. Business .....	10
4.1.6. Contaminated land .....	10
4.1.7. Ecology .....	10
4.1.8. Electromagnetic interference.....	10
4.1.9. Ground movement.....	10
4.1.10. Groundwater .....	10
4.1.11. Historical heritage .....	10
4.1.12. Land use planning.....	10
4.1.13. Landscape and visual.....	10
4.1.14. Noise and vibration.....	10
4.1.15. Social and community .....	10
4.1.16. Surface water .....	11

4.1.17. Sustainability and greenhouse gas.....	11
4.1.18. Traffic and transport .....	11
<b>5. Early Works corrective actions.....</b>	<b>11</b>
<b>6. Early Works conclusions .....</b>	<b>11</b>
<b>Appendices .....</b>	<b>12</b>
A. EMF / EPR criteria audited during the reporting period .....	12
B. Statement of limitations and disclaimer .....	13

**Table 1: GLOSSARY OF ABBREVIATIONS**

<b>Abbreviation</b>	<b>Expanded form</b>
<b>CEMP</b>	Construction Environmental Management Plan
<b>EES</b>	Environment Effects Statement
<b>EMF</b>	Environmental Management Framework
<b>EMP</b>	Environmental Management Plan
<b>EPR</b>	Environmental Performance Requirement
<b>GED</b>	General Environmental Duty
<b>IEA</b>	Independent Environmental Auditor
<b>ISO</b>	International Standards Organisation
<b>NC</b>	Non-compliance
<b>POSF</b>	Public Open Space Framework
<b>SRL</b>	Suburban Rail Loop
<b>SRLA</b>	Suburban Rail Loop Authority
<b>UDLP</b>	Urban Design and Landscape Plans
<b>UDS</b>	Urban Design Strategy
<b>WEMP</b>	Worksite Environmental Management Plan

**Table 2: GLOSSARY OF TERMS**

Term	Description
<b>Contractor</b>	The terms 'Contractor' or 'Contractors' within this report apply to contractors engaged by SRLA to deliver a works package for SRL East and whose activities the IEA will review and audit over the course of the Project.
<b>Early Works</b>	Early Works are approved under the Suburban Rail Loop (East) Planning Scheme Amendment GC197 and Incorporated Document and must comply with the SRL East Environmental Management Framework. Early Works are activities primarily comprised of Preparatory Works associated with the phased delivery of SRL East. Preparatory Works are defined in the Incorporated Document.
<b>Incorporated Document</b>	The SRL East Incorporated Document dated August 2022.
<b>Independent Environmental Auditor</b>	Independent Environmental Auditor appointed pursuant to the Environmental Management Framework (EMF) endorsed by the Minister for Environment and Climate Action.
<b>Minor non-compliance</b>	The evidence demonstrates that the criteria has been partially met and at present does not fully meet the relevant project environmental obligations.
<b>Major non-compliance</b>	The evidence either demonstrates that the criteria has not been met, or there was an absence of evidence demonstrating that the criteria had been met. As such the corresponding aspect of the project environmental obligations is not being met.
<b>Project environmental obligations</b>	This refers to the environmental obligations for the Project, which cover managing risks to the environment and human health and the conditions of the SRL East approvals, including the EMF, EPRs and UDS, against which compliance of a Contractor's environmental documentation and management plans will be assessed through review and verification by the IEA as well as delivery of the IEA compliance audit program.
<b>Suburban Rail Loop</b>	SRL is an integrated rail and precincts program, with a new 90-kilometre orbital rail line from Cheltenham to Werribee and planning for the surrounding precincts around each SRL station.
<b>Suburban Rail Loop Authority</b>	Suburban Rail Loop Authority (SRLA) is the proponent for the Project and is responsible for planning and delivering Suburban Rail Loop (SRL). SRLA was established in September 2019, and became a statutory authority in December 2021, governed by the <i>Suburban Rail Loop Act 2021</i> .
<b>Suburban Rail Loop East</b>	Suburban Rail Loop (SRL) East is the section of Suburban Rail Loop between Cheltenham and Box Hill.

# 1. Introduction

## 1.1. Role of the Independent Environmental Auditor

Nation Partners Pty Ltd (Nation Partners) is the Independent Environmental Auditor (IEA) for Suburban Rail Loop (SRL) East Early Works, pursuant to the Environmental Management Framework (EMF) endorsed by the Minister for Environment and Climate Action.

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

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

## 1.2. Report purpose and structure

This IEA Summary Report (Report) presents the IEA audit activities and audit findings from the first six-month period of Early Works construction of the Suburban Rail Loop (SRL) East Project (the Project). The Report has been prepared by the IEA and SRLA to provide specific detail relevant to the audit program for the reporting period 10 May to 11 November 2023 (the 'reporting period') and addresses the requirements under Section 6.2.1 of the EMF.

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

This Report is structured under the following sections:

- Section 2: Audit program – objectives, scope
- Section 3: Audit activities – details the scope of the IEA's audit activities undertaken prior to, during and after the audit
- Section 4: Audit findings – provides the IEA's findings from compliance audits against the EMF / EPRs
- Section 5: Corrective actions - status of actions taken to address audit findings
- Section 6: Audit conclusion – on the Contractor's compliance with the requirements of the EMF / EPRs

Appendices

- Appendix A – EMF / EPR criteria audited during the reporting period (August Quarterly audit)
- Appendix B – Statement of Limitations and Disclaimer.

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

## 2. Audit program

### 2.1. Objectives

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

- Comply with environmental duties under the *Environment Protection Act 2017* and other relevant environmental legislation.
- Comply with the project approvals, EMF, EPRs, UDS and POSF.
- Comply with the (IEA verified) SRLA and contractor documents and management plans.
- Appropriately mitigate risks to human health and the environment.
- Include continual improvement opportunities in environmental management, performance, legislative and policy compliance.

### 2.2. Scope

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

**Table 3: EMF and EPR quarterly compliance audit details**

Characteristic	Detail
Auditees	SRLA and contractors
Frequency	Quarterly  Early Works construction commenced in May 2023, and audit activities commenced three months post the commencement of construction (August 2023)
Locations	Desktop and project sites (risk based)
Scope	SRLA and Contractor compliance with, and implementation of the EPRs and the Environmental Strategy, CEMP, WEMPs, OEMP, and other plans required by the EPRs and conditions of approval.  Compliance with every applicable EPR to be audited annually. High-risk activities to be audited more frequently.
Inputs	Observations of project activities  Interviews with contractor / subcontractor, and SRLA personnel  Review of documents and records
Stage	Construction and first two years of operation (or until Minister for Planning is satisfied that audits are no longer required)

As required under the EMF, routine environmental performance audits (monthly) commenced six months post commencement of works (in November 2023, just outside of the reporting period), and will be captured in the next six-monthly summary report.

## 2.3. Risk-based approach

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

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

Audit sites were selected by the IEA on the basis that they provided a representative sample of the locations in which Project construction activities were being undertaken, with consideration to the nature of the risk associated with the activities, including their interface with sensitive receptors, namely the environment and surrounding communities.

## 2.4. Compliance status

In accordance with AS/NZS ISO19011:2019, a qualitative scale is used to categorise quarterly audit findings as described in Table 4.

**Table 4: Audit outcome compliance status**

Audit outcome status	Definition
Compliant	The evidence demonstrates that the criteria under consideration has been met.
Minor Non-compliance (Minor NC)	The evidence demonstrates that the criteria has been partially met and at present does not fully meet the relevant project environmental obligations.
Major Non-compliance (Major NC)	The evidence either demonstrates that the criteria has not been met, or there was an absence of evidence demonstrating that the criteria had been met. As such the corresponding aspect of the project environmental obligations is not being met.
Opportunity for Improvement (OFI)	The evidence demonstrated that the criteria under consideration had been met, but in the future, there was an opportunity to provide greater clarity or demonstration that the criteria had been met.

## 2.5. Corrective actions

Corrective actions to address compliance audit findings are the responsibility of SRLA and its Contractors. Corrective actions are not prescribed by the IEA, but are determined, implemented and tracked by the Contractor and/or SRLA. The IEA is responsible for auditing corrective action status, including the effectiveness of remedies and the status of actions to address findings (i.e. whether the IEA considers the finding has been adequately addressed and can be closed), prior to, or during the subsequent compliance audit.

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



## 3. Early Works audit activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in EMF Table 5.1 is subject to a process of review or verification and approval or acceptance. Prior to the commencement of construction, the IEA reviewed (and verified) environmental documentation and management plans against the overarching Project environmental obligations, and the EPRs that pertain to the active construction works.

The IEA's documentation review and verification included the Contractor's Environmental Strategy, the Construction Environmental Management Plan (CEMP), Worksite Environmental Management Plans (WEMPs), and other plans as required by the EPRs and as relevant to the scope of the audit.

The IEA considered the technical adequacy and effectiveness of actions proposed in the documentation and once verified, the IEA conducted an audit in August 2023 to assess Contractor compliance against the Project environmental obligations. SRLA compliance was also assessed, where applicable.

Early Works were the only active construction works during the reporting period. Sites visited by the IEA during the reporting period included:

- Box Hill: Corner of Whitehorse Road and Station Street
- Burwood: Sinnott Street Reserve.

In total, 56 of the 122 EPRs were audited during this reporting period. The EMF / EPR criteria audited during the reporting period is outlined in Appendix A. The findings arising from the IEA's EPR audits are presented in Section 4 below.

## 4. Early Works audit findings

### 4.1. Environmental Performance Requirements

The IEA found that the majority of the 56 EPRs audited during this reporting period were considered compliant. Four Minor non-compliances (Minor NC) were raised. The following sub-sections summarise these audit findings. As this is the first audit summary report for the Project, no statement can be made in relation to trends pertaining to findings.

The Early Works Contractor (Laing O'Rourke Australia Construction Pty Ltd) is responsible for compliance with the majority of EPRs listed below unless otherwise noted. SRLA is responsible for compliance with several EPRs, and some have been assessed as not being applicable to Early Works. Compliance against the balance of applicable EPRs (not audited during this reporting period therefore not listed below) will be reported in subsequent IEA summary reports.

#### 4.1.1. Environmental management

Four Environmental Management EPRs (EMF1 – EMF4) were audited during this reporting period and were deemed compliant, with the exception of one Minor NC. The IEA audited the Environment Strategy, the CEMP, WEMPs (across all locations visited), and the Communications and Stakeholder Engagement Plan (CSEP).

The Minor NC finding pertained to a groundwater well that had not been identified in the relevant WEMP, had been damaged, and not recorded as an incident.

#### 4.1.2. Aboriginal cultural heritage

The ACH1 EPR was audited and found to be compliant.

#### 4.1.3. Air quality

Two EPRs were audited (AQ1 and AQ2) and found to be compliant.

#### **4.1.4. Arboriculture**

Four EPRs were audited (AR1, AR2, AR3, AR4). All were deemed to be compliant, with the exception of one Minor NC where a small number of protected trees were not fenced off correctly, as outlined in the Contractor's Tree Protection and Removal Management Plan (TPRMP).

#### **4.1.5. Business**

Six EPRs were audited (B1, B2, B3, B4, B6, and B9) and found to be compliant.

#### **4.1.6. Contaminated land**

Contaminated Land EPRs were not audited during this reporting period.

#### **4.1.7. Ecology**

Ecology EPRs were not audited during this reporting period.

#### **4.1.8. Electromagnetic interference**

Electromagnetic Interference EPRs were not audited during this reporting period.

#### **4.1.9. Ground movement**

Ground Movement EPRs were not audited during this reporting period.

#### **4.1.10. Groundwater**

Groundwater EPRs were not audited during this reporting period.

#### **4.1.11. Historical heritage**

Seven EPRs were audited (HH1, HH2, HH3, HH4, HH5, HH6, and HH8) and found to be compliant.

#### **4.1.12. Land use planning**

Three EPRs were audited (LUP1, LUP3, and LUP4) and found to be compliant, with the exception of one Minor NC associated with three locations of temporary fencing that did not fully meet the requirements defined in the relevant Land Use Interface Plans (LUIP). Two of the three fences have now been replaced, and steps to address the remaining fence are in progress.

#### **4.1.13. Landscape and visual**

Two EPRs were audited (LV4 and LV5) and found to be compliant.

#### **4.1.14. Noise and vibration**

Nine EPRs were audited (NV1, NV2, NV3, NV4, NV5, NV6, NV7, NV8 and NV11) and found to be compliant.

#### **4.1.15. Social and community**

Four EPRs were audited (SC2, SC4, SC5 and SC6) and found to be compliant.

#### **4.1.16. Surface water**

Nine EPRs were audited (SW1, SW2, SW3, SW4, SW6, SW7, SW8, SW9 and SW10) and found to be compliant, with the exception of one Minor NC, where automatic surface water monitors had not yet been installed in line with the Surface Water Management Plan. These are now in place.

#### **4.1.17. Sustainability and greenhouse gas**

Sustainability and Greenhouse Gas EPRs were not audited during this reporting period.

#### **4.1.18. Traffic and transport**

Five EPRs were audited (T1, T2, T3, T4 and T5) and found to be compliant.

## **5. Early Works corrective actions**

Corrective actions have been undertaken by the Contractor and/or SRLA to respond to audit findings identified during the reporting period. The IEA considered most findings have been actioned and closed upon review of evidence provided. Actions are progressing to address the two remaining open audit findings.

## **6. Early Works conclusions**

SRL East's Project compliance with its EMF, EPRs (as audited during the reporting period), CEMP, UDLPs and other relevant management plans has been evaluated. Both the Contractor(s) and SRLA have addressed the requirements of the EMF through the preparation and implementation of Project-specific environmental management plans (as specified within the EMF and its associated EPRs).

During the reporting period, the IEA issued four Minor NC findings, two of which have now been addressed and closed. Overall, Project activities were found to be largely compliant with the 56 EPRs against which construction activities were audited. The IEA does not consider the audit findings to represent systemic issues, nor present ongoing material risks to the environment, including the two findings which are considered open at the time of finalising this Report. Subsequent IEA six-monthly summary reports will provide status updates on corrective actions undertaken in the relevant reporting period(s).

# Appendices

## A. EMF / EPR criteria audited during the reporting period

Table A1: EMF / EPR criteria audited during the reporting period (august quarterly audit)

Topic	Criteria
EMF and EPRs	<ul style="list-style-type: none"> <li>• EPRs EMF1 – EMF4</li> <li>• Environment Strategy</li> <li>• CEMP</li> <li>• WEMPs – across all locations visited</li> </ul>
Aboriginal cultural heritage	<ul style="list-style-type: none"> <li>• EPR ACH1</li> <li>• Cultural Heritage Management Plan (CHMP)</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>• EPRs AQ1 to AQ2</li> <li>• Environmental Air Pollution &amp; Dust Monitoring Plan (EAPDMP)</li> </ul>
Arboriculture	<ul style="list-style-type: none"> <li>• EPRs AR1 to AR4</li> <li>• Tree Protection &amp; Tree Removal Management Plan (TPRMP)</li> </ul>
Business	<ul style="list-style-type: none"> <li>• EPRs B1 to B4, B6 and B9</li> <li>• Business Disruption Mitigation Plans (BDMPs)</li> <li>• Business Disruption Management Framework (BDMF)</li> <li>• SRL Business Support Guidelines</li> <li>• CSEMP</li> <li>• Employee Assistance Strategy</li> </ul>
Historical heritage	<ul style="list-style-type: none"> <li>• EPRs HH1 to HH6, and HH8</li> <li>• CEMP Historical Heritage Sub-plan</li> <li>• Archaeological Management Plans</li> <li>• Heritage Interpretation Strategy</li> </ul>
Land use planning	<ul style="list-style-type: none"> <li>• EPRs LUP1, LUP3 and LUP4</li> <li>• Public Open Space (POS) Framework</li> <li>• POS Management Plan – for locations visited</li> <li>• Land Use Interface Plans – for locations visited</li> </ul>
Landscape and visual	<ul style="list-style-type: none"> <li>• EPRs LV4 and LV5</li> </ul>
Noise and vibration	<ul style="list-style-type: none"> <li>• EPRs NV1 to NV8 and NV11</li> <li>• Out of Hours Works (OOHW) Notifications</li> <li>• Construction Noise &amp; Vibration Management Plan (CNVMP)</li> </ul>
Social and community	<ul style="list-style-type: none"> <li>• EPRs SC2, SC4, SC5 and SC6</li> <li>• Communications and Stakeholder Engagement Plan (CSEMP)</li> </ul>
Surface water	<ul style="list-style-type: none"> <li>• EPRs SW1 to SW4 and SW6 to SW10</li> <li>• CEMP Stormwater Management Sub-plan</li> </ul>
Traffic and transport	<ul style="list-style-type: none"> <li>• EPRs T1 to T5</li> <li>• Traffic Management Plans (TMPs)</li> </ul>

## **B. Statement of limitations and disclaimer**

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

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

This Report and the audit findings described in this Report are therefore innately limited in respect of such available information and the scope of related services and resources, and also as a result of inherent uncertainties that exist in relation to environmental conditions that relate to any information in this document (if applicable).

This Report must be read in its entirety and must not be copied, distributed or referred to in part only, and no excerpts are to be taken as representative of the findings.

Nothing in this Report constitutes advice or recommendations from SRLA or the IEA. To the maximum extent permitted by law, SRLA makes no warranties and disclaims all responsibility and liability in respect of the accuracy, completeness, reliability, and integrity of the audit activities or audit findings described in this Report. Each of SRLA and the IEA does not represent or warrant that this Report contains all requisite information needed to determine a future course of action, to guarantee results, and/or to achieve a particular outcome. The interpretation, application and general use of the information contained in this Report is at the recipient's own risk.

Recipients should not solely rely on the contents of this Report and should undertake any necessary research, surveys or further enquiries required to independently validate the use of such content.

The contents of this Report are published with the permission of SRLA and the IEA. Recipients should not reproduce its contents.