



**SUBURBAN  
RAIL LOOP**

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

**May 2024 – November 2024**



**SUBURBAN  
RAIL LOOP**  
AUTHORITY



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**Table 1: GLOSSARY OF ABBREVIATIONS**

Abbreviation	Expanded form
<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>Contractor EMS</b>	Environmental Management System developed and implemented by contractors in accordance with ISO 14001:2015
<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>Initial Works</b>	Works described as excluded works (known as Initial Works) in Schedule 1 of the Public Works Order and published in Victoria Government Gazette No. S 682 (22 December 2020) and as amended on 5 August 2021 that are being delivered under the requirements of the Initial Works Management Plan as endorsed by the Minister for Planning on 19 December 2021.
<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 Authority EMS</b>	Environmental Management System to be developed by the Suburban Rail Loop Authority
<b>Suburban Rail Loop (East)</b>	Suburban Rail Loop (East) is the section of Suburban Rail Loop between Cheltenham and Box Hill.

# 1. Introduction

## 1.1. Role of the IEA

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

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

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

## 1.2. Report Purpose and Structure

This IEA Summary Report (Report) presents the IEA audit activities and audit findings from the third 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 2024 – 11 November 2024 (the 'reporting period') and addresses the requirements under Section 6.2.1 of the Environmental Management Framework (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 / EPR's
- 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 / EPR's

Appendices

- Appendix A – EMF / EPR criteria audited during the reporting period
- 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's environmental obligations
- Comply with the (IEA verified) SRLA and contractor documents and management plans
- Appropriately mitigate risks to human health and the environment
- Include continual improvement opportunities in environmental management, performance, legislative and policy compliance.

### 2.2. Scope

The EMF requires that the IEA conducts the following audits:

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

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

**Table 3: EMF and EPR Quarterly Compliance Audit Details**

Characteristic	Detail
Auditees	SRLA and contractors
Frequency	Quarterly. Early Works construction commenced in May 2023, and audit activities commenced three months post the commencement of construction (August 2023).
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)

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

**Table 4: Routine Monthly Environmental Performance Audit Details**

Characteristic	Detail
Auditees	Contractors
Frequency	Monthly, starting 6 months from commencement of works. Early Works construction commenced in May 2023, and audit activities commenced in November 2023.
Locations	Rotation at active construction sites, compounds, laydown areas (all sites visited within a 3-month rotation).
Scope	Contractor compliance with CEMP, WEMPs and other applicable management plans
Inputs	<p>Observations of project activities</p> <p>Interviews with contractor / subcontractor, and SRLA personnel</p> <p>Review of documents and records. Documents and records to be reviewed include:</p> <ul style="list-style-type: none"> <li>Environmental monitoring, process monitoring and management performance monitoring results</li> <li>Work method statements, site plans</li> <li>Incidents and a representative set of complaints records</li> <li>Inspection and audit reports</li> <li>Soil and waste management records</li> <li>Surveys</li> <li>Meeting minutes</li> <li>Monthly reports</li> <li>Other documents relevant to assessing compliance and the technical adequacy and effectiveness of actions taken to comply with the EMF, EPRs, Environmental Strategy, UDLPs, CEMP.</li> </ul>
Stage	Construction and first two years of operation (or until Minister for Planning is satisfied that audits are no longer required).

## 2.3. Risk Based Approach

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

- Outputs from SRLA and contractor risk assessments
- Work activities with an inherent higher risk of environmental impact
- Work activities being undertaken in locations proximal to environmentally sensitive areas (e.g., watercourses, ecologically sensitive areas, residences)

- Intensity / amount of work in progress at each site
- Work activities with the potential to contribute to cumulative environmental impacts
- Complaints received, recent incidents, and/or non-compliances
- Results of previous audits including corrective action rectification.

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

## 2.4. Compliance Status

In accordance with *AS/NZS ISO19011:2019*, a qualitative scale is used to categorise audit findings as described in Table 5.

**Table 5: Quarterly 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 meet the relevant project environmental obligations.
Major Non-compliance (Major NC)	The evidence either demonstrates that the criteria has not been met, or there is an absence of evidence demonstrating that the criteria has been met. As such the corresponding aspect of the project environmental obligations is not being met.

**Table 6: Monthly Audit Outcome Compliance Status**

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

## 2.5. Corrective Actions

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

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

### 3. Early Works Audit Activities

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

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

- Quarterly Audits<sup>1</sup> (Auditees - SRLA and Contractor)
  - Quarterly Audit #4: May 2024
  - Quarterly Audit #5: August 2024
- Monthly Audits (Auditee - Contractor)
  - Monthly Audit #7: May 2024
  - Monthly Audit #8: June 2024
  - Monthly Audit #9: July 2024
  - Monthly Audit #10: August 2024
  - Monthly Audit #11: September 2024
  - Monthly Audit #12: October 2024
- Environmental Management System Audit (Auditee – SRLA)
  - SRLA EMS Audit #1: July 2024

Early Works were the only active construction works during the reporting period subject to audit by the IEA. Active construction sites visited during the reporting period, included Box Hill, Burwood, Cheltenham, Glen Waverley, Monash, Clayton, and the Southern Stabling Facility (Heatherton).

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

During the reporting period, the IEA monitored SRLA and Contractor progress to address audit findings. At the commencement of the reporting period, there were five Monthly audit findings, and six Quarterly audit findings considered 'open' that were raised during the prior reporting period.

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<sup>1</sup> Scope periodically includes Contractor EMS

## 4. Early Works Audit Findings

### 4.1. Environmental Performance Requirements

The IEA found that the majority of the 58 EPRs audited during this reporting period were considered compliant. Fifteen Minor Non-compliances (Minor NC) were raised, of which five were closed during the reporting period. The following sub-sections summarise the audit findings.

The Early Works Contractor (Laing O'Rourke Construction Australia 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 applicable to Early Works or have not as yet been triggered by the works.

#### 4.1.1. Environmental Management

Four Environmental Management EPRs (EMF1 – EMF4) were audited and deemed compliant, with the exception of five Minor NCs pertaining to: site environmental management controls, remedial action plan for underground storage tank removal, and document management. The IEA audited implementation of the Environment Strategy, the CEMP and WEMPs (across all locations visited).

Three of the five Minor NCs were closed during the reporting period to the satisfaction of the IEA. The IEA continues to monitor the progress towards satisfactory closure of all open findings with the two Environmental Management EPR findings remaining open at the completion of the reporting period. Both open findings were categorised as Moderate risk by the IEA, and not considered to pose a risk to human health or the environment.

#### 4.1.2. Air Quality

Two EPRs were audited (AQ1 and AQ2) and deemed compliant, with the exception of one Minor NC, categorised as Low risk by the IEA, pertaining to the siting of specific noise and dust monitoring equipment which was open at the completion of the reporting period.

#### 4.1.3. Arboriculture

One EPR was audited (AR1) and deemed compliant with the exception of one Minor NC pertaining to tree protection fencing. This finding was closed during the reporting period to the satisfaction of the IEA.

#### 4.1.4. Contaminated Land

Two EPRs were audited (C4 and C8) and were found to be compliant.

#### 4.1.5. Ecology

Four EPRs were audited (EC1, EC2, EC3 and EC4) and were found to be compliant.

#### 4.1.6. Electromagnetic Interference

Two EPRs were audited (EMI1A and EMI1) and were determined to be not relevant to Early Works.

#### 4.1.7. Ground Movement

Three EPRs were audited (GM1, GM2, and GM3) and were found to be compliant.

#### **4.1.8. Groundwater**

Five EPRs were audited (GW1, GW2, GW3, GW4 and GW5) and deemed compliant with the exception of one Minor NC pertaining to groundwater monitoring reports. This finding was closed during the reporting period to the satisfaction of the IEA.

#### **4.1.9. Historical Heritage**

One EPR was audited (HH9) and was found to be compliant.

#### **4.1.10. Land Use Planning**

Three EPRs were audited (LUP2, LUP4 and LUP5) and deemed compliant with the exception of one Minor NC pertaining to IEA verification of the guide for planning permit applications under SCO15 Suburban Rail Loop East Infrastructure Incorporated Document which is a responsibility of SRLA. This finding remained open during the reporting period; however, the IEA does not consider that this represents a risk to human health or the environment.

#### **4.1.11. Landscape and Visual**

Five EPRs (LV1, LV3, LV4, LV5 and LV6) were audited and were found to be compliant.

#### **4.1.12. Noise and Vibration**

Nine EPRs (NV1, NV2, NV3, NV4, NV5, NV6, NV7, NV8 and NV11) were audited and deemed compliant with the exception of three Minor NCs pertaining to noise monitoring. These three Minor NC's were open at the end of the reporting period and were categorised by the IEA as Moderate risk and the IEA does not consider they represent a risk to human health or the environment.

#### **4.1.13. Social and Community**

Four EPRs (SC3, SC4, SC5 and SC7) were audited and were found to be compliant.

#### **4.1.14. Surface Water**

Eight EPRs (SW1, SW2, SW3, SW4, SW6, SW7, SW9 and SW10) were audited and deemed compliant with the exception of two Minor NCs pertaining to the required update of a surface water management plan. These two findings remained open at the close of the reporting period and both were categorised by the IEA as Low risk and the IEA does not consider that this represents a risk to human health or the environment.

#### **4.1.15. Traffic and Transport**

Five EPRs (T1, T2, T3, T4 and T5) were audited and deemed compliant with the exception of 1 Minor NC pertaining to IEA review and verification of WTMP Extracts. This Minor NC was open at the end of the reporting period, was categorised by the IEA as Low risk and is not considered by the IEA to represent a risk to human health or the environment.

### **4.2. Routine Environmental Performance Audits**

During Routine Monthly Environmental Performance Audits, the IEA through a process of document and record review, interviews and site observations, assessed the Contractor's compliance against the CEMP, site based WEMPs and associated sub-plans. During its audit program within the reporting period, the IEA identified thirty-eight audit findings against audit criteria, thirty-one of which were closed within the reporting period.

Findings were rated as Low, Moderate or High risk as defined in Table 6. The majority of findings (thirty) were rated as Low risk by the IEA. Seven Moderate risk findings were raised during the reporting period (two Arboriculture & Ecology findings, three Noise, Vibration & Lighting findings and two General findings). One High risk finding (Contaminated Land &

Stockpile Management) was raised during the reporting period. The High risk finding was closed during the reporting period.

Three Moderate risk findings (one General finding, two Noise, Vibration & Lighting findings) and four Low risk findings (two General findings, one Noise, Vibration & Lighting finding, one Hazardous substances finding) remained open at the end of the reporting period and are not considered by the IEA to represent a material risk to human health or the environment.

### 4.3. Trends in Performance

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. No Major NCs were raised during EMF and EPR Compliance (Quarterly) Audits nor EMS audit during the reporting period, which continues the trend of no Major NCs having been identified by the IEA during the audit program to date. The IEA recognises that the Contractor and SRLA are progressively working through addressing the remaining open findings, one of which had been open since November 2023 and was not closed within the reporting period<sup>2</sup> relating to the requirement to determine whether off-site measures of the Residential Support Guidelines (RSGs) are effective, and where effective, would be reasonably practicable to implement.

During the reporting period, EMF and EPR Compliance (Quarterly) Audit findings the majority of findings did not exceed a Moderate risk rating, and arose from the EMF, Noise & Vibration and Surface Water EPRs.

The IEA has identified an emerging trend in environmental performance relating to compliance with Noise and Vibration EPR requirements as Early Works have progressed. The Contractor has undertaken an update of EPR documentation relating to noise, however challenges remain with regards to implementation of the verified RSGs commitments, in particular implementation of acoustic treatment (where practicable) and meeting prescribed communication requirements for noise-affected sensitive receivers. Through the audit program, the IEA observes that the Contractor and SRLA continue to work proactively with residents to address gaps in implementation of the RSGs.

Routine Environmental Performance (Monthly) Audits identified one High-risk finding as assessed by the IEA, relating to Contaminated Land & Stockpile Management, which was closed during the reporting period. This finding is the only High risk finding raised during Monthly audits to date. Monthly audit findings have predominantly been Low-risk.

The audit program identified approximately double the number of findings during this third reporting period as compared to the prior reporting periods. This is in part due to audit activity across a larger number of active sites associated with the early works program.

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<sup>2</sup> This finding open since November 2023 has now been closed to the satisfaction of the IEA.

## 5. Early Works Corrective Actions

During the reporting period, the IEA made:

- Fifteen Quarterly EMF / EPR Minor NC findings, five of which were addressed by the Contractor (or SRLA where relevant) and evaluated by the IEA as being closed during the reporting period. As at the end of this reporting period, fourteen EMF / EPR Quarterly Audit Minor NC findings remained open, four of which carryover from a prior reporting period.
- Thirty-eight Routine Monthly Environmental Performance Audit findings, thirty-one of which have now been addressed by the contractor and evaluated by the IEA as being closed. Eight findings remained open at the completion of the reporting period, one of which is a carryover from the prior reporting period.

## 6. Early Works Conclusions

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

Overall, Project activities were found to be largely compliant with the 58 EPRs against which construction activities were audited. The majority of audit findings across the Early Works audit program continue to be closed out to the satisfaction of the IEA as confirmed prior to, or during the subsequent audit.

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

# Appendices

## A. EMF / EPR Criteria Audited During the Reporting Period

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

Topic	Criteria
<b>EMF &amp; EPRs</b>	<ul style="list-style-type: none"> <li>EPRs EMF1 – EMF4</li> <li>Environmental Strategy</li> <li>CEMP</li> <li>WEMPs – across all locations visited</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>EPRs AQ1 – AQ2</li> <li>Environmental Air Pollution &amp; Dust Monitoring Plan (EAPDMP)</li> </ul>
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>EPR AR1</li> <li>Tree Protection and Removal Plan (TPRP)</li> </ul>
<b>Contaminated Land</b>	<ul style="list-style-type: none"> <li>EPRs C4 and C8</li> <li>CEMP</li> <li>Spoil, Contaminated Land and Acid Sulfate Soil Management Plan</li> </ul>
<b>Ecology</b>	<ul style="list-style-type: none"> <li>EPRs EC1 – EC4</li> </ul>
<b>Ground Movement</b>	<ul style="list-style-type: none"> <li>EPRs GM1 – GM3</li> </ul>
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>EPRs GW1 – GW5</li> <li>Groundwater Monitoring Plan</li> </ul>
<b>Historical Heritage</b>	<ul style="list-style-type: none"> <li>EPR HH9</li> <li>CEMP Historic Heritage Sub-plan</li> <li>Archaeological Management Plans</li> <li>Heritage Interpretation Strategy</li> </ul>
<b>Land Use Planning</b>	<ul style="list-style-type: none"> <li>EPRs LP2(1), LP4 and LP5</li> </ul>
<b>Landscape and Visual</b>	<ul style="list-style-type: none"> <li>EPRs LV1, LV3 – LV6</li> <li>Land Use Interface Plan</li> <li>Environmental Strategy</li> </ul>
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>EPRs NV1 – NV8 and NV11</li> <li>Out of Hours Works (OOHW) Notifications</li> <li>Construction Noise &amp; Vibration Management Plan (CNVMP)</li> <li>Residential Support Guidelines</li> </ul>
<b>Social and Community</b>	<ul style="list-style-type: none"> <li>EPRs SC3 – SC5 and SC7</li> <li>Communications and Stakeholder Engagement Plan (CSEMP)</li> </ul>
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>EPRs SW1 – SW7 and SW9 – SW10</li> <li>CEMP Stormwater Management Sub-plan</li> </ul>
<b>Traffic and Transport</b>	<ul style="list-style-type: none"> <li>EPRs T1 – T5</li> <li>WTMP Extracts</li> </ul>

Note: SRLA and the IEA have determined that the following EPR's had either not as yet been triggered or are not applicable to Early Works : EPRs B5 to B8, C5, C7, E5, EMI1 to EMI3, GM4, GW6, HH7, HH9(1)&(3), LUP2(2)&(3), LV2, LV7, NV1A, NV9 to NV10, NV12 to NV18, SC6, SW5, SW8, SGG3 to SGG7 and T6 to T8.

## 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).

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