



**SUBURBAN
RAIL LOOP**

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

November 2025 – May 2026



**SUBURBAN
RAIL LOOP**
AUTHORITY



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Table 1: GLOSSARY OF ABBREVIATIONS

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

Table 2: GLOSSARY OF TERMS

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

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

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

1. Introduction

1.1. Role of the IEA

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

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

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

1.2. Report Purpose and Structure

The SRL East Project (the Project) is being delivered by several contractors, each with separate scopes of work. Nation Partners is the appointed IEA for the Early Works scope, while HEC is the appointed IEA for Tunnels North and Tunnels South work packages. This Summary Report (Report), prepared by both IEAs and SRLA, presents the IEA audit activities and subsequent findings from both IEAs auditing the project for the reporting period of 11 November 2025 to 10 May 2026 (the 'reporting period'). It is a requirement of the SRL East EMF, as specified in Section 6.2.1, that the IEA and SRLA prepare this summary report every six months.

This Report provides compliance status with respect to the SRL East EMF, EPRs, the Contractors' Environmental Strategies, CEMPs, Worksite Environmental Management Plans (WEMPs) and other management plans or procedures as specified as being required by the EMF and EPRs.

This Report is structured as follows:

- **Section 2:** Audit Program – summarises key elements of the audit program, including objectives, scope, risk-based approach, compliance status and corrective actions
- **Section 3** – summarises the key audit details and outcomes relevant to the Early Works contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Early Works contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- **Section 4** – summarises the key audit details and outcomes relevant to the Tunnels South contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- **Section 5** – summarises the key audit details and outcomes relevant to the Tunnels North contract, including a summary of audit activities undertaken during the reporting period, audit findings, a status summary of corrective actions undertaken by the Contractor and a generalised conclusion on the Contractor's compliance with the requirements of the EMF / EPRs.
- **Section 6** – summarises the key audit details and outcomes relevant to audits undertaken of SRLA's obligations and requirements, including a summary of audit activities undertaken during the reporting period, and corrective actions proposed. This is the first summary report in which SRLA audits have been included in this summary report
- Appendices
 - **Appendix A** – EMF / EPR criteria audited during the reporting period for the Early Works scope
 - **Appendix B** – EMF / EPR criteria audited during the reporting period for Tunnels South scope
 - **Appendix C** – EMF / EPR criteria audited during the reporting period for Tunnels North scope
 - **Appendix D** – EMF / EPR criteria audited during the reporting period for SRLA
 - **Appendix E** – Statement of Limitations and Disclaimer

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

2. Audit Program

2.1. Objectives

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

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

2.2. Scope

The EMF requires that the IEA conducts the following audits:

- EMF and EPR Compliance Audits
- Routine Environmental Performance Audits.

For each EMF / EPR compliance 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 Compliance Audit Details

Characteristic	Detail
Auditees	SRLA and Contractors
Frequency	Quarterly for contractors and every six-months for SRLA. Early Works construction commenced in May 2023, and audit activities commenced three months post the commencement of construction (August 2023). Tunnels South construction commenced in November 2024, and audit activities commenced three months post the commencement of construction (February 2025). Tunnels North construction commenced in July 2025, and audit activities commenced three months post the commencement of construction (September 2025). Audits of SRLA commenced in August 2023 and were initially undertaken in conjunction with Early Work audits. Standalone SRLA audits commenced in November 2025.
Locations	Desktop and project sites (risk based)
Scope	SRLA and Contractor compliance with, and implementation of, the EPRs and the Environmental Strategy, CEMP, WEMPs, OEMP, and other plans required by the EPRs and conditions of approval. Compliance with every applicable EPR to be audited annually. High-risk activities to be audited more frequently. The Contractors are responsible for compliance with the majority of EPRs listed in the EMF. SRLA is responsible for compliance with several EPRs, and some have been assessed as not

Characteristic	Detail
	applicable to a Contractor or have not as yet been triggered by the works. SRLA is audited separately for compliance against the EPRs for which it is responsible.
Inputs	Observations of project activities Interviews with Contractor / subcontractor, and SRLA personnel 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 Environmental Performance Audit, the IEA assesses compliance of the Contractor's construction activities with the applicable WEMPs through a monthly rotation of visits to each active project site. Table 4 describes the scope of Routine Monthly Environmental Performance Audits.

Table 4: Routine Environmental Performance Audit Details

Characteristic	Detail
Auditees	Contractors
Frequency	Monthly, starting 6 months from commencement of project works. Early Works construction commenced in May 2023, and routine monthly environmental performance audits commenced in November 2023. Tunnels South construction commenced in November 2024. Routine monthly environmental performance audits also commenced in November 2024. Tunnels North construction commenced in July 2025. Routine monthly environmental performance audits commenced in August 2025.
Locations	Rotation at active construction sites, compounds, laydown areas (all sites visited within a 3-month rotation).
Scope	Contractor compliance with CEMP, WEMPs and other applicable management plans
Inputs	Observations of project activities Interviews with contractor / subcontractor. Review of documents and records, including: - Environmental monitoring, process monitoring and management performance monitoring results - Work method statements, site plans - Incidents and a representative set of complaints records - Inspection and audit reports - Soil and waste management records - Surveys - Meeting minutes - Monthly reports - Other documents relevant to assessing compliance and the technical adequacy and effectiveness of actions taken to comply with the applicable WEMPs

Characteristic	Detail
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, while higher risk activities may be audited more frequently. Higher risk activities are determined through consideration of (but not limited to):

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

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

2.4. Compliance Status

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

2.4.1. Early Works compliance classifications

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

Table 5: Quarterly Audit Outcome Compliance Classifications

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

Table 6: Monthly Audit Outcome Compliance Classifications

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

2.4.2. Tunnels South and Tunnels North compliance classifications

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

Table 7: Audit Outcome Compliance Classifications

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

2.5. Corrective Actions

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

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

3. Early Works

3.1. Early Works Audit Activities

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

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

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

The following summarises the contractual arrangements that were subject to IEA audits during the reporting period:

- Quarterly Audits – Two quarterly audits were undertaken during the reporting period. The Managing Contractor was auditee on one occasion (in November 2025), while the Monash BPSP Contractor was the auditee on one occasion (January 2026).
- Monthly Audits – Eight monthly audits were undertaken during the reporting period. The Managing Contractor was the auditee on two occasions, while the Monash BPSP Contractor was the auditee on four occasions, and the SRLA Managed Works contractors were the auditees on two occasions.

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

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

During the reporting period, the IEA monitored SRLA and Contractor progress to address previous audit findings. At the commencement of the reporting period, there were two Monthly audit findings, and no Quarterly audit findings considered ‘open’¹. Both of these findings were closed during the reporting period.

3.2. Early Works Audit Findings

3.2.1. EMF and EPR Quarterly Compliance Audits

The IEA found that the majority of the EPRs audited during this reporting period were considered compliant. Five (5) Minor Non-compliances (Minor NCs) were raised as follows:

- Two (2) Minor NCs related to Managing Contractor works, both of which were closed during the reporting period.
- Three (3) Minor NCs related to the Monash BPSP Contractor works, none of which were closed during the reporting period.

¹ Of the two monthly findings, two were raised in the May 2025 – November 2025 reporting period, both were closed during this reporting period.

The Early Works Managing Contractor is responsible for compliance with the majority of EPRs listed in Table 8 unless otherwise noted. SRLA is responsible for compliance with several EPRs, and some have been assessed as not applicable to Early Works or have not as yet been triggered by the works.

Audits of Monash BPSP works were undertaken against all EPRs, except those related to Ground Movement and Groundwater, as these were determined not applicable to the scope of works.

Audit findings are summarised in Table 8.

Table 8: Audit Outcome Compliance Classifications

EPR Category	Managing Contractor Works		Monash BPSP Contractor Works	
	Criteria	Audit outcome	Criteria	Audit outcome
Environmental Management Framework	EMF1, EMF2 Environmental Strategy CEMP WEMP Complaints management system	One (1) Minor NC pertaining to transmittals of minor revisions of documents not in accordance with the requirements of the Environmental Strategy.	EMF1 – EMF4 Environmental Strategy CEMP WEMP Complaints and incident records	One (1) Minor NC pertaining to implementation of the internal audit program in accordance with the Environmental Strategy and CEMP.
Aboriginal Cultural Heritage	ACH1 CHMP	Compliant	ACH1 CHMP	Compliant
Air Quality	NA	NA	AQ1, AQ2 Environmental Air Pollution and Dust Management Plan	Compliant
Arboriculture	AR2, AR3 Tree Protection and Removal Plan	Compliant	AR2, AR3 Tree Protection and Removal Plan	Compliant
Business	B4 Business Disruption Management Plan Business Disruption Mitigation Framework SRL Business Support Guidelines Community and Stakeholder Engagement Management Plan	One (1) Minor NC pertaining to the requirement to conduct of annual surveys to assess visitation impacts on businesses.	B1 – B4, B9 Business Disruption Management Plan Community and Stakeholder Engagement Management Plan	Compliant
Contaminated Land	C1, C2, C4, C6 CEMP Hazardous Ground Gas Management Plan Soil, Contaminated Land and Acid Sulfate Soil Management Plan	Compliant	C1 – C3, C6 Spoil, Contaminated Land, Acid Sulfate Soil and Rock Management Plan	Compliant
Ecology	NA	NA	EC1 – EC4 Flora and Fauna Management Plan	Compliant
Electromagnetic interference	NA	NA	EMI2	Compliant

EPR Category	Managing Contractor Works		Monash BPSP Contractor Works	
	Criteria	Audit outcome	Criteria	Audit outcome
Ground Movement	GM1 – GM3 Ground Movement Plan	Compliant	NA	NA
Groundwater	GW5	Compliant	NA	NA
Historical Heritage	HH1 – HH6 CEMP Historic Heritage Sub-plan Archaeological Management Plan	Compliant	HH6 CEMP	Compliant
Land Use Planning	NA	NA	LUP1 Monash Land Use Interface Plan	Compliant
Landscape and Visual	NA	NA	LV4, LV5 WEMP	Compliant
Noise and Vibration	NV1 – NV8, NV11 Construction Noise and Vibration Management Plan Out of Hours Works Permits Residential Support Guidelines	Compliant	NV1 – NV8, NV10, NV11, NV15, NV16 Construction Noise and Vibration Management Plan Out of Hours Works Permits	Compliant
Social and Community	NA	NA	SC2, SC4 Community and Stakeholder Engagement Management Plan	Compliant
Surface Water	SW7 Surface Water Management Plan	Compliant	SW1 – SW4, SW6, SW9, SW10 Surface Water Management Plan Flood Emergency Management Plan	Compliant
Sustainability and Climate Change	SGG2, SGG8 – SGG10 Sustainability Management Plan	Compliant	SGG1, SGG2, SGG8 – SGG10 Sustainability Management Plan	One (1) Minor NC pertaining to gaps in monthly sustainability reporting.
Traffic and Transport	NA	NA	TW1 – TW5 Traffic Management Plans	One (1) Minor NC pertaining to implementing project parking in accordance with the Transport Management Plan.

NA – Not audited this reporting period

3.2.2. Routine Environmental Performance Audits

During Routine Monthly Environmental Performance Audits, the IEA, through a process of document and record review, interviews and site observations, assessed the Contractors' compliance against the CEMP, site based WEMPs and associated sub-plans. During its audit program within the reporting period, the IEA identified thirteen audit findings against audit criteria, all of which were closed within the reporting period. No findings remained open at the end of the reporting period. All thirteen findings were rated as Low risk by the IEA.

3.2.3. Trends in Performance

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. All findings raised during EMF and EPR Compliance (Quarterly) Audits in the reporting period were Minor NCs. No Major NCs were raised in this reporting period during EMF and EPR Compliance (Quarterly) Audits, compared to one Major NC raised in the previous audit reporting period.

All the Routine Environmental Performance (Monthly) Audits findings identified during the reporting period were rated as Low Risk. Findings predominantly related to water and sediment (four findings), hazardous substances (three findings), and general environmental management (two findings). No Routine Environmental Performance (Monthly) Audit findings were rated Medium or High risk during the reporting period.

3.3. Early Works Corrective Actions

During the reporting period, the IEA made:

- Five Quarterly EMF / EPR Minor NC findings, two of which were addressed by the Contractors (or SRLA where relevant) and evaluated by the IEA as being closed during the reporting period, and;
- Thirteen Routine Monthly Environmental Performance Audit findings, all of which were addressed by the Contractors and evaluated by the IEA as being closed within the reporting period.

As at the end of this reporting period:

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

Table 9 and Table 10 provide a summary of corrective actions by finding type and contractor.

Table 9. Early Works EMF / EPR audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Managing Contractor Works				
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	2	2	0
Totals	0	2	2	0
Monash BPSP Contractor works				
Major Non-compliance	0	0	0	0
Minor Non-compliance	0	3	0	3
Totals	0	3	0	3

Table 10. Routine Monthly Environmental Performance Audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Managing Contractor Works				
High risk	0	0	0	0
Medium risk	0	0	0	0
Low risk	2	7	9	0
Totals	2	7	9	0
Monash BPSP Contractor works				
High risk	0	0	0	0
Medium risk	0	0	0	0
Low risk	0	5	5	0
Totals	0	5	5	0
SRLA Managed Contractor works				
High risk	0	0	0	0
Medium risk	0	0	0	0
Low risk	0	1	1	0
Totals	0	1	1	0

3.4. Early Works Conclusions

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

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

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

4. Tunnels South

4.1. Tunnels South Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in Table 5.1 of the EMF is subject to a process of review or verification and approval or acceptance. The IEA has continued its work in the review and verification of environmental documentation and management plans against the overarching Project environmental

obligations and the EPRs as new stages of work have commenced. Further, the IEA has also reviewed any major revisions of previously verified documentation. The IEA during its review process considered the technical adequacy and effectiveness of actions proposed in the documentation.

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

- Three Quarterly Audits, undertaken in November 2025, February and May 2026 (Auditee – Contractor)
- Three Monthly Audits in December 2025, March 2026 and April 2026 (Auditee – Contractor)

Active construction sites visited during the reporting period, included Monash, Clayton, Clarinda Tunnel Boring Machine (TBM) Launch Facility, and SSY West.

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

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

Monthly Audits assessed the compliance of the Contractors with the WEMPs.

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

4.2. Tunnels South Audit Findings

4.2.1. EPR Quarterly Compliance Audits

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

Fifty-five EPRs were directly audited in the reporting period, for the EPR categories shown in the table below (and in Appendix B). Some EPRs were audited more than once in the audit period. The management plans required by the EPRs are separately audited.

Table 11. Tunnels South EPR audit findings

EPR Category	EPRs audited	Audit outcome
Arboriculture	AR1, AR4	Compliant
Business and retail	B3, B4	Compliant
Contaminated Land	C1, C2, C3, C4, C6, C7, C8	Compliant
Ecology	EC1	Compliant
Electromagnetic interference	EMI1A, EMI1, EMI2	Compliant
Ground Movement	GM1, GM2, GM3, GM4	Compliant
Groundwater	GW1, GW2, GW5	Compliant
Historical Heritage	HH1, HH2, HH3, HH4	Compliant
Land Use Planning	LUP3, LUP4	Compliant
Noise and Vibration	NV1A, NV1, NV4, NV5, NV6, NV7, NV8, NV9, NV10, NV11, NV15, NV16	A finding was raised against NV3 as the CNVMP had not been reviewed and submitted to the IEA for reverification as required by EPR NV3(1).
Social and Community	SC2, SC4	Compliant

EPR Category	EPRs audited	Audit outcome
Surface Water	SW1, SW4, SW6, SW10	Compliant
Sustainability and Climate Change	SGG2, SGG3, SGG8	Compliant
Traffic and Transport	T1, T2, T6	Compliant

The IEA found that all except one of the EPRs audited during this reporting period were considered compliant. A Major Non-compliance was raised against EPR NV1. This was not considered a material risk to the environment or human health.

Table 12. Tunnels South EPR audit findings

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

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

4.2.2. Quarterly Environmental Strategy and CEMP audits

The Environmental Strategy and CEMP were audited during the reporting period. No findings were raised against the requirements of the Environmental Strategy or the CEMP.

Three open findings raised from previous audits were closed during the reporting period.

Table 13. Tunnels South Environmental Strategy and CEMP audit findings

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

4.2.3. Quarterly Management Plan audits

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

Eleven findings were open at the start of the reporting period. Evidence gathered during the audit supported the closure of twelve findings, with four remaining open.

Table 14. Tunnels South Management Plans audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	11	5	12	4
Totals	11	5	12	4

4.2.4. Monthly Environmental Performance Audits

The IEA visits each active site monthly to assess conformance with the environmental controls defined in the WEMPs. Four audit findings were raised, including one Major Non-compliance for an uncontrolled surface water discharge. The remaining findings related to inadequate site environmental controls including surface water management and mud on roads.

All findings were closed during the reporting period.

Table 15. Tunnels South WEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	1	1	0
Minor Non-compliance	1	3	4	0
Totals	1	4	5	0

4.2.5. Trends in Performance

Two Major Non-compliances were raised during reporting period; one in relation to the review of the CNVMP; and the other for uncontrolled discharge of sediment laden water.

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

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

4.3. Tunnels South Corrective Actions

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. The IEA recognises that the Contractor is progressively working through addressing the remaining open findings. The IEA recognises that some findings may take some time to close, particularly those related to revising environmental documentation.

At each audit the IEA reviews corrective actions undertaken by the Contractor, and their effectiveness. Where effective corrective actions have been implemented the audit finding is closed.

Sixteen findings were open at the start of the audit period. Ten were raised and twenty-two closed in the reporting period with four remaining open as noted in the table below.

Table 16. Tunnels South corrective actions

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	2	2	4	0
Minor Non-compliance	14	8	18	4
Total	16	10	22	4

4.4. Tunnels South Conclusions

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

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

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

5. Tunnels North

5.1. Tunnels North Audit Activities

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

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

- Two Quarterly Audits, undertaken in December 2025 and March 2026 (Auditee – Contractor)
- Three Monthly Audits in November 2025, February 2026 and April 2026 (Auditee – Contractor)

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

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

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

Monthly Audits assessed the compliance of the Contractors with the WEMPs.

During the reporting period the IEA monitored Contractor progress on addressing audit findings.

5.2. Tunnels North Audit Findings

5.2.1. EPR Quarterly Compliance Audits

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

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

Table 17. Tunnels North EPR audit findings

EPR Category	EPRs audited	Audit outcome
Environmental management framework	EMF2	Compliant
Aboriginal cultural heritage	ACH1	Compliant
Arboriculture	AR1	Compliant
Business	B1, B2, B3, B4	Compliant
Contaminated Land	C4, C6	Compliant
Ecology	EC1	Compliant
Electromagnetic interference	EMI1A, EMI1, EMI2	Compliant
Ground Movement	GM1, GM2, GM3, GM4	Compliant

EPR Category	EPRs audited	Audit outcome
Groundwater	GW1, GW2, GW3, GW4, GW5	Compliant
Historical Heritage	HH1, HH2, HH3, HH4, HH5, HH8	Compliant
Land use planning	LUP1, LUP2, LUP3	A finding was raised against EPR LUP1 as a plan that specifies how the design and construction of the Project minimises impacts on existing land uses has not formally been developed.
Landscape and Visual	LV4, LV5	Compliant
Noise and Vibration	NV2, NV5, NV6, NV7, NV8, NV9, NV10, NV15, NV16	Compliant
Social and Community	SC2, SC4	A finding was raised against EPR SC2 as site specific communications and stakeholder engagement plans had not been established.
Surface Water	SW2, SW3, SW4, SW7, SW8 SW9, SW10	Compliant
Sustainability and Climate Change	SGG3, SGG8, SGG9, SGG10	Compliant
Traffic and Transport	T2, T3, T4, T5, T6	Compliant

The IEA found that all except two of the EPRs audited during this reporting period were considered compliant. A Minor Non-compliance was raised against EPR LUP1 and against EPR SC2 as noted in the table above and below. These were not considered a material risk to the environment or human health.

Table 18. Tunnels North EPR audit findings

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

5.2.2. Quarterly Environmental Strategy and CEMP audits

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

Four findings were closed during the reporting period, and one remained open in relation to tracking environmental objectives and targets.

Table 19. Tunnels North Environmental Strategy and CEMP audit findings

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

5.2.3. Quarterly Management Plan audits

The Management Plans required by the EMF were audited twice during the reporting period. Eight findings were raised, none of which were considered to be Major Non-compliances. The findings related to implementation of documented environmental, transport and community engagement related management arrangements as well as requirements to improve air and noise monitoring and controls. None were considered a material risk to the environment or human health.

Evidence was gathered to close four findings and five remained open at the end of the reporting period.

Table 20. Tunnels North Management Plan audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	1	8	4	5
Totals	1	8	4	5

5.2.4. Monthly Environmental Performance Audits

The IEA visits each active site monthly to assess conformance with the environmental controls defined in the WEMPs. Five audit findings were raised. These related to on-ground environmental controls including for noise, mud on roads and storage of chemical containers.

Five findings were closed during the reporting period and the one regarding adequate storage of chemical containers remained open. This was not considered to present a material risk to the environment.

Table 21. Tunnels North WEMP audit findings

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	1	5	5	1
Totals	1	5	5	1

5.2.5. Trends in Performance

No Major NCs were raised during the reporting period.

Most findings were about incomplete implementation of processes described in the management plans and this is expected to improve as these processes mature. On-ground controls relating to noise, mud on roads and management of chemical containers also required ongoing attention. These had moderate or low risk to the environment.

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

5.3. Tunnels North Corrective Actions

The IEA has completed a review of audit findings raised and remedies being implemented during the reporting period. The IEA recognises that the Contractor is progressively working through addressing the remaining open findings. The IEA

recognises that some findings may take some time to close, particularly those related to revising environmental documentation.

At each audit the IEA reviews corrective actions undertaken by the Contractor, and their effectiveness. Where effective corrective actions have been implemented the audit finding is closed.

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

Table 22. Tunnels North corrective actions

Finding Type	Open at the start of the reporting period	Raised during the reporting period	Closed during the reporting period	Open at the end of the reporting period
Major Non-compliance	0	0	0	0
Minor Non-compliance	3	19	13	9
Total	3	19	13	9

5.4. Tunnels North Conclusions

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

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

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

6. SRLA

6.1. SRLA Audit Activities

As per Section 5 of the EMF and as required by the EPRs, the documentation outlined in Table 5.1 of the EMF is subject to a process of review or verification and approval or acceptance. The IEA has conducted its work in the review and verification of environmental documentation and management plans against the overarching Project environmental obligations and the EPRs.

In addition, the IEA monitors SRLA compliance with relevant EPRs and its EMS via a program of Compliance Audits, generally conducted every six months. The following audits were conducted during the reporting period:

- An EPR compliance audit, undertaken in November 2025 (Auditee – SRLA)
- An EPR compliance audit, inclusive of an annual EMS audit in April 2026 (Auditee – SRLA)

The scope of the Compliance Audits was determined and agreed by relevant stakeholders with a draft Audit Plan issued for comment prior to finalisation of the agreed scope. The IEA sought input and verification from SRLA on the relevance of select EPRs. As a result, many EPRs remain out of scope, as all or key parts of these EPRs were not applicable to SRLA.

6.2. SRLA Audit Findings

6.2.1. EPR Compliance Audits

All applicable EPRs are audited over a twelve-month rolling audit cycle. Thirty-four EPRs were directly audited in the reporting period, for the EPR categories shown in the table below.

Table 23. SRLA EPR audit findings

EPR Category	EPRs audited	Audit outcome
Environmental management framework	EMF1, EMF3, EMF4	A finding was raised against EPR EMF1 as not all elements of the EMS have been developed to fully meet the requirements of ISO 14001
Arboriculture	AR1, AR4	Compliant
Business	B1, B2, B3, B5, B6, B7, B8, B9	A finding was raised against EPR B8 as the business and commercial property purchase scheme process had not been fully established.
Contaminated Land	C3, C7, C8	Compliant
Ecology	EC3, EC5	Compliant
Electromagnetic interference	EMI1A, EMI1	Compliant
Ground Movement	GM4	Compliant
Historical Heritage	HH8	Compliant
Land use planning	LUP2, LUP4, LUP5	Compliant
Noise and Vibration	NV1A	Compliant
Social and Community	SC1, SC5, SC6, SC7	Compliant
Surface Water	SW9	Compliant
Traffic and Transport	T2, T6, T8	Compliant

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

There were no Major Non-compliances.

Minor Non-compliance findings were raised against EPR EMF1 and against EPR B8 as noted in the table above. These were not considered a material risk to the environment or human health.

6.2.2. Annual EMS audit

The SRLA EMS was audited against the key elements of ISO 14001:2015.

There were no Major Non-compliances.

One Minor Non-compliance finding was raised as not all elements of the EMS have been developed to fully meet the requirements of ISO 14001. This is the same finding as that raised against EPR EMF1 noted in Table 13 above, and the finding was not considered a material risk to the environment or human health.

6.3. SRLA Corrective Actions

There were no open findings at the start of the reporting period. The findings raised were both identified during the April 2026 audit. Corrective actions to address these findings will be reviewed by the IEA in a future audit. Where effective corrective actions have been implemented the audit finding will be closed.

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

Table 24. SRLA corrective actions

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

6.4. SRLA Conclusions

SRLA has largely developed the environmental documentation required by the EMF.

The outcomes of the audits suggest that some processes are currently not yet fully established. The IEA notes that none of the audit findings in the reporting period posed a material risk to the environment or to human health.

Appendices

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

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

Topic	Criteria	
	Managing Contractor Works	Monash BPSP Contractor Works
EMF & EPRs	- EPRs EMF1 – EMF2 - Environmental Strategy - CEMP - WEMPs – across all locations visited - Complaints Management System	- EMF1 – EMF4 - Environmental Strategy - CEMP - WEMP - Complaints and incident records
Aboriginal Cultural Heritage	- EPR ACH1 - Cultural Heritage Management Plan	- EPR ACH1 - Cultural Heritage Management Plan
Air Quality	NA	- EPR AQ1 and AQ2 - Environmental Air Pollution and Dust Management Plan
Arboriculture	- EPRs AR2 and AR3 - Tree Protection and Removal Plan	- EPRs AR2 and AR3 - Tree Protection and Removal Plan
Business	- EPR B4 - Business Disruption Management Plan - Business Disruption Mitigation Framework - SRL Business Support Guidelines - Community and Stakeholder Engagement Management Plan	- EPRs B1 – B4, B9 - Business Disruption Management Plan - Community and Stakeholder Engagement Management Plan
Contaminated Land	- EPRs C1, C2, C4, and C6 - CEMP - Hazardous Ground Gas Management Plan - Soil, Contaminated Land and Acid Sulfate Soil Management Plan	- EPRs C1 – C3 and C6 - Spoil, Contaminated Land, Acid Sulfate Soil and Rock Management Plan
Ecology	NA	- EPRs EC1 – EC4 - Flora and Fauna Management Plan
Electromagnetic interference	NA	EPR EMI2
Ground Movement	- EPRs GM1 – GM3 - Ground Movement Plan	NA
Groundwater	EPR GW5	NA
Historical Heritage	- EPRs HH1 – HH6 - CEMP Historic Heritage Sub-plan - Archaeological Management Plan	- EPR HH6 - CEMP
Land Use Planning	NA	- EPR LUP1 - Monash Land Use Interface Plan

Criteria		
Topic	Managing Contractor Works	Monash BPSP Contractor Works
Landscape and Visual	• NA	• EPRs LV4 and LV5 • WEMP
Noise and Vibration	• EPRs NV1 – NV8 and NV11 • Out of Hours Works (OOHW) Permits • Construction Noise & Vibration Management Plan • Residential Support Guidelines	• EPRs NV1 – NV8, NV10, NV11, NV15, and NV16 • Construction Noise & Vibration Management Plan • Out of Hours Works Permits
Social and Community	• NA	• EPRs SC2 and SC4 • Community and Stakeholder Engagement Management Plan
Surface Water	• EPR SW7 • Surface Water Management Plan	• EPRs SW1 – SW4, SW6, SW9, and SW10 • Surface Water Management Plan • Flood Emergency Management Plan
Sustainability and Climate Change	• EPRs SGG2, and SGG8 – SGG10 • Sustainability Management Plan	• EPRs SGG1, SGG2, and SGG8 – SGG10 • Sustainability Management Plan
Traffic and Transport	• NA	• EPRs T1 – T5 • Traffic Management Plan

NA - Not audited during this reporting period

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

B. Tunnels South audit criteria audited during the reporting period

Table B1: EPRs audited during the reporting period

EPR Category	EPRs audited
Arboriculture	AR1, AR4
Business and retail	B3, B3
Contaminated Land	C1, C2, C3, C4, C6, C7, C8
Ecology	EC1
Electromagnetic interference	EMI1A, EMI1, EMI2
Ground Movement	GM1, GM2, GM3, GM4
Groundwater	GW1, GW2, GW5
Historical Heritage	HH1, HH2, HH3, HH4
Land Use Planning	LUP3, LUP4
Noise and Vibration	NV1A, NV1, NV4, NV5, NV6, NV7, NV8, NV9, NV10, NV11, NV15, NV16
Social and Community	SC2, SC4

Surface Water	SW1, SW4, SW6, SW10
Sustainability and Climate Change	SGG2, SGG3, SGG8
Traffic and Transport	T1, T2, T6

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

SRL East Tunnels South Environmental Strategy

- Selected key applicable elements from the Environmental Strategy

Construction Environmental Management Plan

- Selected key applicable elements from the CEMP

CEMP Sub-plans and EPR Management Plans

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

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

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

Worksite Environmental Management Plans

Relevant elements from:

- WEMP Monash
- WEMP Clayton
- WEMP Clarinda
- WEMP SSY West

C. Tunnels North audit criteria audited during the reporting period

Table C1: EPRs audited during the reporting period

EPR Category	EPRs audited
Environmental management framework	EMF2
Aboriginal cultural heritage	ACH1
Arboriculture	AR1
Business	B1, B2, B3, B4
Contaminated Land	C4, C6
Ecology	EC1
Electromagnetic interference	EMI1A, EMI1, EMI2
Ground Movement	GM1, GM2, GM3, GM4
Groundwater	GW1, GW2, GW3, GW4, GW5
Historical Heritage	HH1, HH2, HH3, HH4, HH5, HH8
Land use planning	LUP1, LUP2, LUP3
Landscape and Visual	LV4, LV5
Noise and Vibration	NV2, NV5, NV6, NV7, NV8, NV9, NV10, NV15, NV16
Social and Community	SC2, SC4
Surface Water	SW2, SW3, SW4, SW7, SW8 SW9, SW10
Sustainability and Climate Change	SGG3, SGG8, SGG9, SGG10
Traffic and Transport	T2, T3, T4, T5, T6

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

SRL East Terra Verde Environmental Strategy

Key applicable elements from the Environmental Strategy

Construction Environmental Management Plan

Key applicable elements from the CEMP

CEMP Sub-plans and EPR Management Plans

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

- Archaeological Management Plan
- Business Disruption Mitigation Plan
- Communications and Stakeholder Engagement Plan
- Construction Noise and Vibration management Plan
- Construction Parking Management Plan
- Contaminated Land Management Plan
- Environmental Air Quality and Dust Management Plan
- Flood Emergency Management Plan
- Flora and Fauna Management Plan
- Potential Acid Sulfate Soil and Rock Management Plan
- Spoil Management Plan
- Surface water Management Plan
- Sustainability Management Plan
- Transport Management Plan
- Tree Removal and Protection Plan
- Wastewater Discharge Management Plan.

Worksite Environmental Management Plans

Relevant elements from:

- WEMP Burwood
- WEMP ESF
- WEMP Glen Waverley.

D. SRLA EPRs audited during the reporting period

Table D1: EPRs audited during the reporting period

EPR Category	EPRs audited
Environmental management framework	EMF1, EMF3, EMF4
Arboriculture	AR1, AR4
Business	B1, B2, B3, B5, B6, B7, B8, B9
Contaminated Land	C3, C7, C8
Ecology	EC3, EC5
Electromagnetic interference	EMI1A, EMI1

Ground Movement	GM4
Historical Heritage	HH8
Land use planning	LUP2, LUP4, LUP5
Noise and Vibration	NV1A
Social and Community	SC1, SC5, SC6, SC7
Surface Water	SW9
Traffic and Transport	T2, T6, T8

E. 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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