

## NON-COMPLIANCES

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action Taken/Response (as applicable)	Proposed Action Due Date
Condition A33	<p>A33: Revision of Strategies, Plans and Programs</p> <p>Within three months of:</p> <p>(a) the submission of an incident report under Schedule 3 condition A28;</p> <p>(b) the submission of an Independent Audit under Schedule 3 condition D36;</p> <p>(c) the approval of any modification of the conditions of this consent; or</p> <p>(d) the issue of a direction of the Planning Secretary under Schedule 3 condition A2(b) which requires a review,</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	The DPHI and the Certifier were not notified for the review of the CEMP and associated Sub-Plans following the submission of the independent audit report, triggering a non-compliance against condition A33(b)	It is recommended that, in accordance with Condition A33, both DPHI and the Certifier be notified for the future review of the CEMP and Sub-Plans	Rohrig will ensure the DPHI and Certifier are notified for future review of the CEMP and Sub-Plans. This has been scheduled to occur within the correct time frame	Closed out and acknowledged 19/08/2025, requires ongoing action
Condition D9	<p>D9: Implementation of Management Plans</p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p>	A complaint was received on 7 February 2025 regarding construction vehicle movements during after-school pickup, which was found to be in breach of the Construction Environmental Management Plan (CEMP), resulting in a non-compliance.	It is recommended to notify workers and subcontractors and implement measures to restrict construction vehicle movements during school drop-off and pick-up times.	Following the complaint, Rohrig responded promptly by conducting a toolbox talk and immediately notifying all subcontractors. As corrective actions were implemented, this non-compliance is now addressed and considered CLOSED.	Closed out 07/02/2025

## OBSERVATIONS & OPPORTUNITIES FOR IMPROVEMENT

Condition Number (ID)	Compliance Requirement	Independent Audit Observation/Opportunity for Improvement	Independent Audit Recommendation	Proponent's Proposed Action/Action Taken/Response or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
Condition C13	<p>C13: Environmental Management Plan Requirements</p> <p>Management plans required under this consent, must be prepared having regard to relevant guidelines, including but not limited to Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020)</p>	The document control page within the CEMP and its associated sub-plans are currently inconsistent in terms of versioning details. This inconsistency can lead to confusion around version control and document traceability.	It is recommended to review the document control page and ensure consistency across the CEMP and its associate sub-plans.	Following the audit, Rohrig provided evidence on 19 August 2025 confirming that the document control page of the CEMP and its Sub-Plans has been updated to ensure consistency across all plans. APP accepted this improvement opportunity is now addressed and considered CLOSED.	Closed out 19/08/2025

Condition D9	<p>D9: Implementation of Management Plans</p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p>	<p>The current Environmental Weekly Inspection form used for the WCC Bryson Building does not include a dedicated section for recording site-specific environmental observations.</p>	<p>It is recommended that the Environmental Weekly Inspection form be updated to include a section for documenting observations to ensure that environmental issues are consistently recorded, tracked and addressed.</p>	<p>Following the audit, Rohrig updated Environmental Weekly Inspection Form was provided on 19 August 2025 confirming that the observation column is included in the form. APP accepted this improvement opportunity is now addressed and considered CLOSED.</p>	<p>Closed out 19/08/2025</p>
Condition D9	<p>D9: Implementation of Management Plans</p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p>	<p>It was noted that some observation close-out photos were not uploaded to the Hammertech system.</p>	<p>Is recommended that all observation close-out photos are consistently uploaded to the Hammertech to ensure traceability and verification of completed actions.</p>	<p>Rohrig will ensure all observations will be closed with photographs. Direction has been given to the Rohrig team to stay on top of this.</p>	<p>Closed out - requires ongoing action from Rohrig</p>