PARLIAMENTARY STANDING COMMITTEE OF PUBLIC ACCOUNTS

- Independent Probity Advisor (IPA) - State Policies and Projects (Macquarie Point Precinct) Order 2025 Statutory Rules 2025, No 49
- Meeting: 6 November 2026
- IPA report to PAC

Probity is the evidence of ethical behaviour and can be defined as complete and confirmed integrity, uprightness and honesty in a particular process.

Overview

Item 1. Conflicts of Interest and Other Project Activity

Item 2. Conflict of Interest Management Plan

Item 3. Actions since 7 August 2026 meeting

Item 4. Decisions between August and November 26

Item 5. Overview of year

Item 6. What is coming up

Appendices – Probity Plan and Conflict of Interest Management Plan Actions + Order Determinations

Conflicts of Interest and Other Project Activity

IPA Disclosure to PAC (6/10/26)

- Ad-hoc working relationship for the host company of one of our team members with a company that reviewed the CEMPs for the MPDC
- No direct involvement by our team member or access to information
- Noted in the IPA COI Register and declared to Building Tasmania, Oversight Committee and PAC
- No other current matters to declare for the IPA team

IPA Team Current Projects

- Deep Dive Review (Tender Evaluation) New Youth Justice Facility (Steve Richards)
- Probity Advisor, DTF, Treasury Complex Re-Purposed (Andrew Harris)

Action arising from 7 August 2026 PAC hearing

- Conflict of Interest (COI) Management Plan
  - Plan provided to PAC on 10 September 2026
  - Version includes feedback from regulators, including Hobart City Council (HCC)
  - Actions in Plan being implemented by IPA (and from earlier this year when in draft)
- Central IPA Conflict of Interest Register is current as at November 2026
- Engagement with State-based regulators on their approaches to COI management – updated for preferred tenderer
- Developing a collaborative process with HCC on its COI processes
- High levels of awareness in participating agencies of the importance of COI
- Particular focus is the dual role of the Secretary, Building Tasmania (BT)

IPA Actions - 7 August to 6 November 2026

IPA decision reports

- Condition B12/13 “Road Reserves” – 7 September
- Condition B1(1)(m) “Other Preparatory Works”- 6 October
- Condition C5 “Dilapidation Survey Reports”- 12 October
- Condition C1 “Construction Environmental Management Plan”
  - Stage 1 Preparatory Works – 28 October
  - Stage 2 Goods & Red Sheds – 28 October

Advisory & Regulator Tasks

- Engagement with TasWater, TasPorts, EPA, DNRET (incl AHT, HT) + MPDC
- Guidance to regulators on CEMPs/Dilapidation Report & monitoring of capacity and timeframes
- Engagement with HCC on its approach to the Order and COI management
- Participation in MPDC briefings on C1, C5 and B1(1)(m) submissions
- Advice to the Office of the Secretary, BT and regulators on emergent matters

Governance & Documentation

- Review of Probity Plan and subordinate documentation:
  - IPA Risk Register
  - Issues Register
  - Probity Advice Log
  - COI Register
- Reports to the Macquarie Point Urban Renewal Oversight Committee (17 August, 4 September, 5 October, 28 October)
- Regular meetings with Office of the Secretary, BT and MPDC

Completed and Current Decisions

Order Condition	Purpose	Regulator + Agencies	Approval/ Notification	IPA advice
Re1	Contaminated Land Audit Report	MPDC notification to EPA	9 September	No
SW1/R1 C3(2)	Notification to HCC that conditions do not apply or are satisfied by C5	MPDC notification to HCC	14 September	No
ENG2	Report on HCC asset condition is satisfied by C5	MPDC notification to HCC	17 September	No
B12/13	Impact Assessment on Road Reserve – Stage 2	BT + Transport, HOSS, HCC	22 September	Yes
G4	MPDC Annual Environmental Report for 2025-26	EPA	23 September	No
H15	Archival record of heritage buildings	HT	14 October	To HT
H1	Goods Shed Heritage Conservation Management Plan	HT	14 October	No
B1(1)(m)	Expansion of definition of Preparatory Works to include 20,000m^3 of material	Minister for Housing & Planning, BT, EPA + HOSS	14 October	Yes

Completed and Current Decisions

Order Condition	Purpose	Regulator + Agencies	Approval/ Notification	IPA advice
B1/G3	Notification of commencement of preparatory works on Evans Street land parcel	MPDC notification to EPA	16 October	No
C5	Dilapidation Survey Report	BT + HCC, TasPorts, HOSS	15-26 October	Yes
C1	Stage 1 Construction Environmental Management Plan	BT & EPA + Transport, HOSS, HCC, TasWater, DNRET, A6 Parties	29 October	Yes
C1	Stage 2 Construction Environmental Management Plan	BT & EPA + Transport, HOSS, HCC, TasWater, DNRET, A6 Parties	29 October	Yes
T20	Construction Management Plan	TasWater	5 November	No
G3	Notification of commencement of Stage 1 and Stage 2 Works (30/11)	MPDC notification to EPA	Current	No
G3	Notification of commencing preparatory works – Stages 1 & 2	MPDC notification to EPA	Current	No

Year as it was……

- Developed and implemented the Probity Plan and Conflict of Interest Management Plan and Action Plans for both
- Maintained currency of IPA's Risk Register, Issues Log, Advice Log, COI Register, Decision Register
- Prepared and maintained processes and documentation architecture to support probity and assurance activities
- IPA consideration or advice on 19 determinations or notifications under the Order
- IPA has submitted advice in a timely manner aligned to project momentum
- Provided formal and informal advice to BT and regulators
- Established constructive working relationships with regulators and through governance structures
- Positive awareness of the Order and the importance of compliance & probity among regulators
- Consultation by the Secretary, BT with regulators has been positive
- Regulators have developed a foundation to manage activity in 2027

The look ahead…

- Continued intense activity into CY2027
    - Staging Plans for 2(b), 3(a), 3(b)
    - Construction Environmental Management Plans + associated docs for each stage
    - Design development/finalisation - involvement of Design Quality and Integrity Review Panel
- Potential for interaction between major contractor's contractual requirements and requirements of the Order
- Learnings from Stages 1 and 2 will benefit Stages 3 & 4
    - Pre-briefings from Proponent
    - Guidance material/navigation for complex documentation submitted for approval
    - Separate treatment of Order, later Order and non-Order comments
- Ongoing monitoring of regulator capacity constraints and fatigue
- Constraints of the Order – i.e. no recusal or conditions on decisions, nor ability to amend plans
- PAC reporting requirements

Questions and Discussion

- Committee areas of focus

Thank you for your time

Appendices For Reference

Probity Plan Actions
Conflict of Interest Management Plan Actions
Summary of IPA advice on decisions
(Aug to Nov 2026)

Probity Plan Work Plan Actions	Actions By IPA Team (November 2026)
Real-time Probity Advice	Examples of recent advice that has been provided includes: - Advice to DNRET/HT on Construction Environment Management Plan + Heritage Sub-Plan.
Monitor Decision-Making Compliance Review compliance with administrative decision-making processes required under the Order	*Formal probity advice reports prepared on:* - CEMPs for Stages 1 and 1 (C1/C2) - Impact Assessment - Stage 2 Goods and Red Shed (B12/B13) - Dilapidation Survey (C5) - (Revised) definition of volumes of excavated materials as preparatory works (B1)(1)(m). *Recorded the following correspondence:* - B1-G3 notice by MPDC advising expected commencement of certain early preparatory works (i.e. project land adjacent to the Gateway) - Note G4 Reporting requirements by MPDC (i.e. annual environmental reporting). - DNRET to MPDC regarding H1, H15 and C1 documentation
Probity Issues Register & Probity Advice Log	Established and current. No updates to Probity Issues Register since 27 July 2026. Probity Advice Log updated 29 September 2026.
Probity Induction & Training	Training/Induction offered to regulators under the Order at each engagement.
Conflicts of Interest Register & Management	- Conflict of Interest Management Plan (Version 5) approved by Secretary, BT on 27 Aug 2026. Final sent to PAC on 10 September 2026. - IPA Conflict of Interest Register established and current. - Advice to DPAC on COI Register for OC and declarations of Conflict of Interest as a standing item for OC meetings. - Engagement with regulators and the Proponent on COI management. - Reviewed Conflict of Interest register for DNRET.

Probity Plan Work Plan Actions (cont'd)	Actions By IPA Team (November 2026)
Spot Checks / Assurance Activities	- CEMPs for Stages 1 and 2 lodged, including evidence of consultation undertaken by MPDC with each third party specified under A6 - Baha'i Centre of Learning; Federal Group; HCC; RSL; TSO; UTAS. - Ongoing engagement with regulators (August to November 2026) on COI management and processes for consultation and approvals under the Order.
Review Document Approvals (A1-A4)	- Ongoing monitoring of A1-A4 conditions in preparing IPA advice for matters under B1(1)(m), B12/13; C1; and C5.
Review of Plans Under Order Approval/Hold Points	- Completed for Stage 1 and Stage 2 CEMPs - September to October 2026.
Probity Breach Management Oversight	- No identified breaches as of 2 November 2026.
Assurance & Gatekeeping Inputs	- Ongoing discussion with Office of the Secretary, BT on incorporation of probity checks into Gate 4 assurance of the project.
Consultation Integrity Checks	- Processes and decisions have been assessed for compliance with the Order for matters under B1(1)(m), B12/13; C1; and C5. - Consultation requirements for each of these decisions have been assessed.
Escalation & Change Control Management	- No material changes to major project parameters advised to IPA related to decisions made under the Order.
Information Security & Publication Compliance	- Discussion Paper prepared and ongoing discussions with BT/MPDC regarding compliance with A3 requirements for relevant documents. IPA input into discussion for publication parameters for C5 decision.

Conflict of Interest Management Plan – IPA Actions as at November 2026

Controls	Activities
Evidence of Internal Frameworks for managing conflict of Interest	*Commenced* - regular IPA engagement with agencies/entities with responsibility for conditions under the Stadium Order on frameworks for the management of COI. Includes: • Discussion with Hobart City Council on its COI framework and documentation • Reviewing DNRET's conflict of interest declarations • Checking with regulators on COI awareness on submission of documents by MPDC (ie CEMPs)
IPA Probity Plan – COI Management & Reporting	IPA cross references actions between the Probity Plan & Conflict of interest Management Plan.
COI Declarations	*Ongoing* – IPA regularly discusses the importance of securing COI declarations with regulators for each individual involved in determinations under the Order. Includes email advice and at selected meetings where Order decisions are being discussed (e.g. CEMP Submissions and B1(1)(m)). IPA regularly checks the currency of COI declarations with regulators. Updates are sought at project milestones – e.g. the release of the CEMPs in August 2026.
HCC Assurance Review	*Commenced* - IPA is liaising with the HCC to implement an agreed assurance review of HCC's Order-related conflict of interest arrangements, recognising HCC's separate elected member and employee accountability frameworks. This engagement is outlined in the COI Management Plan. IPA has offered training and awareness material and has discussed with HCC its conflict assessment and management processes, records of controls applied, and information security arrangements. Most recent meeting 20 October 2026.
Audits of COI Declarations	*Ongoing* - the IPA is considering a process for collaborative "spot checks" of COI declarations and Registers at agency level. See "Spot Checks" below for more detail.
Whole of Project COI Register	*Commenced* - IPA has established and maintains a central, whole of project COI Register which records conflict matters reported by participating agencies.

Conflict of Interest Management Plan – IPA Actions as at November 2026

Controls	Activities
Training and Awareness	*Ongoing* - the IPA regularly offers inductions and regular refreshers for agencies. No offers taken up yet.
Reporting by Agencies	*Ongoing* - IPA to work with agencies on quarterly reports on the management of COI to the IPA. In practice, IPA engages with regulators on a monthly basis.
Administrative Decision-Making Reviews	*Ongoing and managed on a case-by-case basis relative to the decision-matter being submitted.* Some examples include regular checks by Secretary, BT about possible conflicts when making decisions under the Order (e.g. Other Preparatory Works and tripartite decision required under B1(1)(m), and release of information under A3). IPA regularly seeks to ensure that entities developing plans, submission or recommendations for approval by the Secretary do not create COIs in the preparation of documents.
Spot Checks	*To be implemented.* IPA is currently pursuing informal measures to drive compliance with COI Management Plan requirements. The IPA will consider a risk-based process for the conduct of spot audits on compliance with administrative decision-making processes. IPA's Risk Register has two risk lines covering spot checks (i.e. P-03 Fairness & Impartiality and PR-011 Governance & Accountability).
Probity Inputs - ITas Project Assurance Framework	*Ongoing* - the IPA has discussed with Building Tasmania how to integrate probity checks, including the effectiveness of agency COI frameworks, into formal project assurance structure such as Gate Reviews, Deep Dives, Health Checks.

Conflict of Interest Management Plan – IPA Actions as at November 2026

Controls	Activities
Centralised Reporting	*Ongoing* - the IPA will provide regular reports to the Macquarie Point Urban Renewal Oversight Committee and the PAC on agency compliance with COI requirements.
Breach Management Oversight	*Ongoing* - the IPA will verify that all COI breaches are recorded, contained, notified, and corrected. COI Register established and current. None identified to date.

Decision – Condition B12/13
Impact Assessment on Road Reserve (Stage 2)

The determination

- B12/13 regulates excavation works within road reservations
- The request relates to Stage 2 works for the removal of the Goods Shed and Red Shed
- Design and construction to maintain the stability and integrity of road infrastructure
- Specifies design drawings, structural certification and supporting geotechnical assessments
- Required before a stage of works for the Project commences
- Approved by the A/Secretary of BT under B13 on 7 September 2026
- IPA advice on 4 September 2026

IPA considerations

- Processes applied were consistent with the Order
- The appropriate basis was followed for the A/Secretary's approval under Condition B13
- State Planning Office reviewed the Impact Assessment - HCC to be consulted before deciding whether to approve the assessment
- HCC requested that any approval advise that all relevant HCC permits and approvals must be obtained before any person occupies or undertakes works within a Council-managed road reservation
- Consultation undertaken with HOSS

Decision – Condition B1(1)(m) "Other Preparatory Works"

The determination

- 9 September 2026 request from MPDC for expansion of definition of preparatory works under B1(1)(m)
- Off-site disposal of material excavated during preparatory works to a cap of 20,000 m3
- Joint determination by the Minister for Housing and Planning, Secretary, BT and the Director of the EPA – meeting on 13 October;
- Joint correspondence to MPDC on 14 October

IPA considerations

- Tripartite approval necessitated avoiding perceptions of influence in decision-making – distinct approval processes between the three decision-makers
- Same information for each decision-maker
- Two meetings between the three parties
- COI checked at meetings
- IPA advice provided on 6 October 2026
- No flow on impacts from determination on CEMPs/other decisions
- Consultation undertaken with HOSS, external technical advisor

Decision – Condition C5
Dilapidation Survey Report

The determination

- Before works commence, a comprehensive dilapidation report is prepared - a photographic and written record of the condition of infrastructure adjacent to Project land
- Report to be approved by the Secretary, BT in consultation with TasPorts and the Hobart City Council
- Approved by Secretary, BT on 15 October 2026 – conveyed to MPDC on 26 October 2026
- No regulator opposition to determination
- IPA advice on 12 October 2026

IPA considerations

- The appropriate basis was followed for the Secretary BT's approval under Condition C5
- Briefing of BT, TasPorts and HCC informed consultation and decision-making
- Shared "navigational" information between the three parties
- COIs checked
- HCC response discussed at full Council sitting
- BT consulted the HOSS
- Publication under A3 to be determined but privacy and other considerations apply

Decision – Condition C1
Construction Environment Management Plans: Stages 1 &2

The determination

- C1 requires a CEMP to be prepared at least 30 days before a stage of works commences
- Must be approved by the Secretary, in consultation with the Director of the EPA
- Separate CEMPs for Stages 1 and 2 submitted by Proponent on 28 August 2026
- Approved by the A/Secretary of BT on 30 October 2026
- IPA advice on 28 October 2026

IPA considerations

- IPA conducted an alignment check of the Stage-specific CEMP Guidelines submitted for Stages 1 & 2 against the requirements of the Order for a C2 approval
- Processes applied were consistent with the Order
- The appropriate basis was followed for the A/Secretary's approval under Condition C1
- Two separate assessments and decisions
- Extensive consultation implemented by Secretary, including HOSS, HCC and external technical advice
- Briefing by Proponent on CEMP structure and content
- Supplementary information requested by Secretary on technical and transport matters