

QUALITY MANAGEMENT ADVISORY

Site Observation Reports (SOR) and Non-Conformance Reports (NCR)

and how a Project Management Consultancy should apply them in the United
Arab Emirates

*Distinguishing the two instruments, applying them correctly on a UAE construction site, closing them
with the contractor, and proving genuine closure to the client*

Technical article and practitioner playbook

Applicable jurisdictions: all seven Emirates, including free zone and developer-administered areas

Companion deliverable: SOR and NCR Control Workbook (editable Excel)

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Distribution and Approval

Role	Organisation	Purpose of receipt	Action required
PMC Project Director	PMC	Contractual oversight and client interface	Approve and enforce
PMC Resident Engineer	PMC	Day-to-day issuance authority for NCRs	Apply and sign
PMC Quality Manager	PMC	Register integrity, KPI reporting, closure verification	Own the process
PMC Discipline Engineers and Inspectors	PMC	Raise SORs, witness tests, verify rectification	Raise and verify
PMC HSE Manager	PMC	Safety observations and safety-linked NCRs	Raise and verify
Contractor Project Manager	Contractor	Response, resources and corrective action	Comply and respond
Contractor QA/QC Manager	Contractor	Root cause analysis, CAPA, evidence packs	Submit evidence
Client Project Manager / Employer's Representative	Client	Assurance, payment and handover decisions	Review and accept
Client Quality or Technical Auditor	Client	Independent verification of closure	Audit and witness

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B	8. Helping the contractor clear them	Containment in the first 48 hours, closing clinics, backlog burn-down, evidence discipline, commercial balance
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D	19. Templates in the companion workbook	The Excel sheets supplied with this article
D	20. Common failure modes and controls	The mistakes that destroy credibility and how to prevent them
D	21. References	Sources and further reading
D	Appendices A to G	SOR form, NCR form, closure certificate, evidence naming convention, glossary, Major NCR close-out field aid (one page), and the enforcement guide covering contract clauses and notice timelines

Abbreviations

Abbreviation	Meaning
ADO / ADCDA	Abu Dhabi Civil Defence Authority
ADDC / AADC	Abu Dhabi Distribution Company / Al Ain Distribution Company

Abbreviation	Meaning
ADM	Abu Dhabi City Municipality (under DMT)
ADQCC	Abu Dhabi Quality and Conformity Council
BCC	Building Completion Certificate
CAPA	Corrective Action and Preventive Action
CD	Civil Defence
CONC	Cost of Non-Conformance
DAFZA	Dubai Airport Free Zone Authority
DCD	Dubai Civil Defence
DDA	Dubai Development Authority
DEWA	Dubai Electricity and Water Authority
DLP	Defects Liability Period (also Defects Correction Period)
DM	Dubai Municipality
DMCC	Dubai Multi Commodities Centre (free zone authority)
DMT	Department of Municipalities and Transport, Abu Dhabi
DoH / DHA	Department of Health Abu Dhabi / Dubai Health Authority
EAD	Environment Agency Abu Dhabi
EDMS	Electronic Document Management System
ESMA	Emirates Authority for Standardization and Metrology (now within MoIAT)
FEWA / EtihadWE	Federal Electricity and Water Authority / Etihad Water and Electricity
GCAA	General Civil Aviation Authority
ITC	Integrated Transport Centre, Abu Dhabi
ITP	Inspection and Test Plan
JAFZA	Jebel Ali Free Zone Authority
KEZAD	Khalifa Economic Zones Abu Dhabi
MOCCAE	Ministry of Climate Change and Environment
MoHRE	Ministry of Human Resources and Emiratisation
MoIAT	Ministry of Industry and Advanced Technology
NCR	Non-Conformance Report
NOC	No Objection Certificate
NTC	Notice to Correct
OSH / OSHAD-SF	Occupational Safety and Health / Abu Dhabi OSH Management System Framework
PCFC / Trakhees	Ports, Customs and Free Zone Corporation / its regulatory arm
PMC	Project Management Consultancy
QA / QC	Quality Assurance / Quality Control
RAKEZ	Ras Al Khaimah Economic Zone
RERA	Real Estate Regulatory Agency, Dubai

Abbreviation	Meaning
RTA	Roads and Transport Authority, Dubai
SEWA	Sharjah Electricity, Water and Gas Authority
SLA	Service Level Agreement (internal response time)
SOR	Site Observation Report (see terminology note in Section 4.3)
TRANSCO	Abu Dhabi Transmission and Despatch Company
WPS	Wage Protection System

Reading note

Throughout this article, SOR means Site Observation Report unless the context relates to occupational safety, where the same abbreviation is often used for Safety Observation Report. Section 4.3 sets out the terminology traps that cause arguments on UAE projects and how to remove them in the project quality plan.

1. Executive Summary

A Site Observation Report (SOR) and a Non-Conformance Report (NCR) are not two versions of the same document. They are two different instruments that sit at two different points on the same escalation ladder, and they carry two different levels of legal and commercial weight. An SOR is a proactive, low-threshold tool that captures a deviation early, assigns a due date and closes it with a photograph and a note. An NCR is a formal quality record raised only when non-compliance with an approved requirement is confirmed - a failed test, a rejected inspection, a missed hold point, an unapproved material, or a concealed deviation. The SOR protects the schedule and the relationship. The NCR protects the client, the specification and the evidentiary record.

Most disputes on UAE projects are not about whether a defect existed. They are about whether the defect was properly identified at the time, whether the contractor was given a fair and documented opportunity to correct it, whether the correction was verified by the right person against the right acceptance criteria, and whether the client can see, in one place, that the matter is genuinely closed. That is a records problem, and it is the PMC's problem to solve.

Four things separate a PMC that manages observations and non-conformances well from one that manages them badly:

1. **Discipline of threshold.** The same issue is classified consistently by every engineer, every day, against written decision rules, rather than according to the mood of the person who saw it first.
2. **Discipline of evidence.** Every closure is supported by objective evidence that a third party could test: a witnessed and documented re-inspection, a laboratory or third-party test result, a calibrated instrument reading, an authority-issued certificate or NOC, a signed approval, or photographic evidence with date and location metadata.
3. **Discipline of time.** Observations and non-conformances are tracked against due dates, aged weekly and escalated before they become commercial or programme events.
4. **Discipline of proof.** The PMC can present the client with a traceable chain from the original finding to the signed closure certificate, with the authority instrument where a regulator was involved, and with statistics that show closure is systemic rather than anecdotal.

The practical result of applying this article is short: fewer NCRs because more issues are caught as observations, faster closure because the contractor knows exactly what evidence is expected, fewer commercial claims because escalation is predictable and documented, and a client who can accept handover without commissioning an independent quality audit to find out whether the works are actually compliant.

The one-sentence distinction

An SOR says: something is not right or could be better, fix it and show me. An NCR says: the works, the materials or a process do not comply with an approved requirement, and I require a documented correction, a root cause and prevention of recurrence, verified by me before I accept that the matter is closed.

2. Purpose, Scope and How to Use This Article

This article explains the difference between SOR and NCR, sets out how a Project Management Consultancy should apply both instruments on a construction site in the United Arab Emirates, shows how to help the contractor clear them efficiently, and describes how the PMC proves genuine closure to the client and, where relevant, to the authorities who regulate the project.

Table 2.1 - Scope of this article

Element	Description
In scope	Quality and technical observations and non-conformances arising from construction, installation, commissioning, materials, workmanship, method, inspection and testing, documentation and interface management, including those raised by or on behalf of authorities and the client
Partially in scope	Safety and environmental observations, which follow parallel HSE regimes; this article treats them where they interact with the same registers, escalation rules and closure evidence
Out of scope	Commercial claims preparation and quantum, employment matters, detailed design verification methodology, and the internal quality procedures of the contractor
Geography	United Arab Emirates, with authority detail for Dubai, Abu Dhabi, Sharjah, Ajman, Umm Al Quwain, Ras Al Khaimah and Fujairah, including free-zone and developer-administered areas
Contract forms	Generally applicable to FIDIC-based contracts (Red, Yellow and Silver Books, 1999 and 2017 editions) and to UAE bespoke and government forms; Particular Conditions prevail in every case

Table 2.2 - How to use this article

Reader	Focus	Use this part
PMC Quality Manager	Designing the process, registers, SLAs, KPIs and closure evidence standards	Sections 7, 9, 10, 19 and the companion workbook
PMC Resident Engineer / Project Director	Issuance authority, escalation decisions and client interface	Sections 5, 7.10, 9.5, 9.9
PMC discipline engineers and inspectors	Day-to-day triage, issuance, verification and evidence capture	Sections 4, 7.2 to 7.8, Appendix A and B
Contractor QA/QC and construction teams	Understanding what the PMC expects and how to close items quickly	Sections 8, 9.3, and the print-ready forms in the workbook
Client project management	Assurance that closure is real, measurable and auditable	Sections 9 and 10
Authority liaison staff	Knowing which authority instrument proves the item is closed	Sections 6 and 11 to 16

3. The UAE Project Context: Why This Discipline Decides Disputes

A construction project in the UAE is regulated by more than a single national building authority. At federal level, product conformity, fire and life safety, environment, labour and aviation are controlled by federal bodies and codes. At emirate level, the municipality or planning authority controls building permits, site inspections and the completion certificate. In free zones and developer-administered areas, a separate regulator such as Trakhees or a developer authority performs that role. Utilities, civil defence, telecom operators, roads and transport authorities each issue their own NOCs and clearances. A project can

therefore be compliant with the specification, approved by the municipality, and still be unable to connect, occupy or hand over because a NOC from a third body is outstanding. Section 12 sets out the whole landscape.

Three features of the UAE market make SOR and NCR discipline commercially decisive:

- 1. **Verification is document-based.** Consultants, clients and authorities accept compliance because a documented check says so. Where inspection and test records are thin, the default assumption later is that the work was not verified, regardless of what was actually built.
- 2. **Handover and payment are conditional.** Building completion or civil defence approval, utility clearance and satisfaction of the authority NOC register are preconditions to obtaining the completion certificate, and taking-over is frequently tied to closure of substantive non-conformances. Unclosed items become retention arguments and delay-defence arguments.
- 3. **A defects liability period follows taking-over.** Anything closed weakly during construction reopens during the defects period, at a point where the contractor's commercial leverage and site presence are both reduced, and where the client expects the PMC to have anticipated it.

Why it matters

A well-run SOR and NCR system is not administration. It is the evidentiary backbone that supports acceptance of the works, release of payment, achievement of completion, defence against claims and protection of the client during the defects liability period.

4. SOR versus NCR: The Core Difference

4.1 Plain definitions

Table 4.1 - Definitions and thresholds

Instrument	Plain-language definition	Threshold for use	Default owner
SOR - Site Observation Report	A structured, logged record of a site observation that requires correction, improvement or clarification. It carries a description, a location, a reference to the requirement, a photograph, a responsible party and a due date.	Minor, early-stage or low-risk deviation; workmanship shortfall; housekeeping; clarification needed; improvement opportunity; a repeated comment that is not yet a confirmed non-compliance.	PMC discipline engineer or inspector; contractor action
NCR - Non-Conformance Report	A formal quality record raised when a deliverable, activity, material, product or process does not comply with an approved requirement. It requires containment, root cause analysis, corrective and preventive action, verification and a signed closure.	Confirmed non-compliance: failed test, rejected inspection, missed hold point, unapproved material or subcontractor, deviation from approved drawing, specification, method statement, code or authority condition, concealed or repeated non-compliance.	PMC Quality Manager or Resident Engineer; contractor response and evidence

4.2 Side-by-side comparison

Table 4.2 - The practical differences a PMC must apply consistently

Dimension	SOR - Site Observation Report	NCR - Non-Conformance Report
Nature of the tool	Proactive, preventive, corrective-coaching	Reactive, formal, contractual and evidentiary
Requires confirmed non-compliance	No. A risk, a shortfall or an aspiration is enough	Yes. Non-compliance must be confirmed against an approved requirement
Typical severity	Low to medium	Medium to high, with defined classes (see Section 7.6)
Who may raise it	Any PMC discipline engineer, inspector, clerk of works or HSE officer	Quality Manager, Resident Engineer or the Engineer's authorised representative, after QA review of the evidence
Approval gate before issue	None. Logged in the register	Yes. Reviewed for accuracy, clause reference and evidence before issue
Reference to contract	Optional. Usually a specification section or good-practice reference	Mandatory. Specification clause, drawing number, revision, ITP reference and hold point
Effect on the work	Work normally continues	Work may be stopped, held at a hold point, segregated, or accepted under concession with conditions
Effect on payment	None in itself	Payment for the affected item may be withheld; the cost of rectification may be back-charged; the item may affect the valuation
Contractor response	Correct the item; optional short written reply; photographic evidence	Formal written response: containment, root cause, corrective action, preventive action, programme and resources
Response time	Typically 24 to 72 hours, or by the next inspection cycle	Acknowledge within 24 to 48 hours; full response within the period set in the quality plan, commonly 7 to 14 days depending on the depth of analysis required
Root cause analysis	Not normally required, unless a pattern is emerging	Required for major and systemic items; five-why analysis as a minimum, extending to fishbone or fault tree where justified
Verification method	Visual confirmation by the inspector, recorded in the register	Documented re-inspection or re-test against defined acceptance criteria, with calibrated equipment and, where specified, client or authority witnessing
Closure instrument	Photograph and note accepted in the register; sign-off by the inspector	NCR Closure Certificate signed by the PMC and the contractor, supported by an evidence bundle
Escalation route	Converted to an NCR if repeated, ignored, concealed or later confirmed as non-compliant	Engineer's instruction, Notice to Correct, deduction, back-charge, contractual notice, or carry-over into the defects liability period
Client visibility	Aggregated counts and trends in the weekly and monthly quality report	Itemised in the monthly report with status, ageing, evidence reference and closure date
Retention	Project duration plus the contractual retention period	Handover dossier, and retained for the defects liability period and any authority audit
Most common misuse	Raised as a punishment tool, or allowed to lapse without a log and without closure	Raised for trivial matters, without evidence, or without an acceptance criterion, which destroys the credibility of the whole system

Dimension	SOR - Site Observation Report	NCR - Non-Conformance Report
Key performance indicators	Number raised and closed, overdue rate, average age, conversion rate to NCR	Number raised and closed by class, mean time to closure, overdue ageing, repeat rate, cost of non-conformance
Best used when	You want the issue fixed today without creating a contractual event	You need a defensible record that the works did not comply, and a verified trail that they now do

4.3 Terminology traps that cause arguments in the Gulf

Abbreviations are used inconsistently across clients, consultants and contracts in the UAE. The PMC should fix the meaning in the project quality plan and use it consistently in every register, form and report.

Table 4.3 - Naming conflicts and how to resolve them

Term	What it sometimes means	Risk if not defined	Control
SOR	Site Observation Report; Safety Observation Report; Site Observation Record; Statement of Requirements	A quality observation and a safety observation end up in the same column of the monthly report with different escalation rules	Define SOR as Site Observation Report and use SOR-HSE for safety observations, reported separately
NCR	Non-Conformance Report; Non-Compliance Report; Non-Conformity Report	Registers from different parties cannot be reconciled at handover	Adopt Non-Conformance Report as the single defined term, and require the contractor to mirror the same numbering
NCR versus NTC	NCR treated as if it were a contractual Notice to Correct	The PMC believes it has preserved the client's contractual position when it has not	State expressly that an NCR is a quality record, and that contractual notices are issued separately under the contract (Section 5.3)
Snag or punch list versus NCR	Closeout finishing items recorded as NCRs, or genuine non-compliances recorded as snags	Either an inflated NCR count or an unclosed compliance issue carried into taking-over	Snags are for closeout completion after the works are otherwise compliant; any confirmed non-compliance goes to the NCR register
Defect versus NCR	Post-handover problems tracked in the construction-phase NCR register	Loss of the defects liability period record and confusion over who bears the cost	Defects identified after taking-over are recorded in the defects register and managed under the contract's defects regime
Observation versus instruction	A verbal instruction recorded later as an observation	Disputes over whether the contractor was instructed, and when	Any direction that changes scope, sequence or cost is issued as a written instruction, not as an observation

Terminology control

Publish a one-page terminology schedule in the project quality plan, define SOR, NCR, NOC, ITP, hold point, snag and defect, and require both the PMC and the contractor to use the same identifiers in their registers. Reconciliation at handover becomes trivial when the identifiers already agree.

4.4 The escalation ladder

The two instruments only work if they sit on a visible ladder, so that everyone knows what happens next when a matter is not closed. The ladder below is the model a PMC should publish and apply.

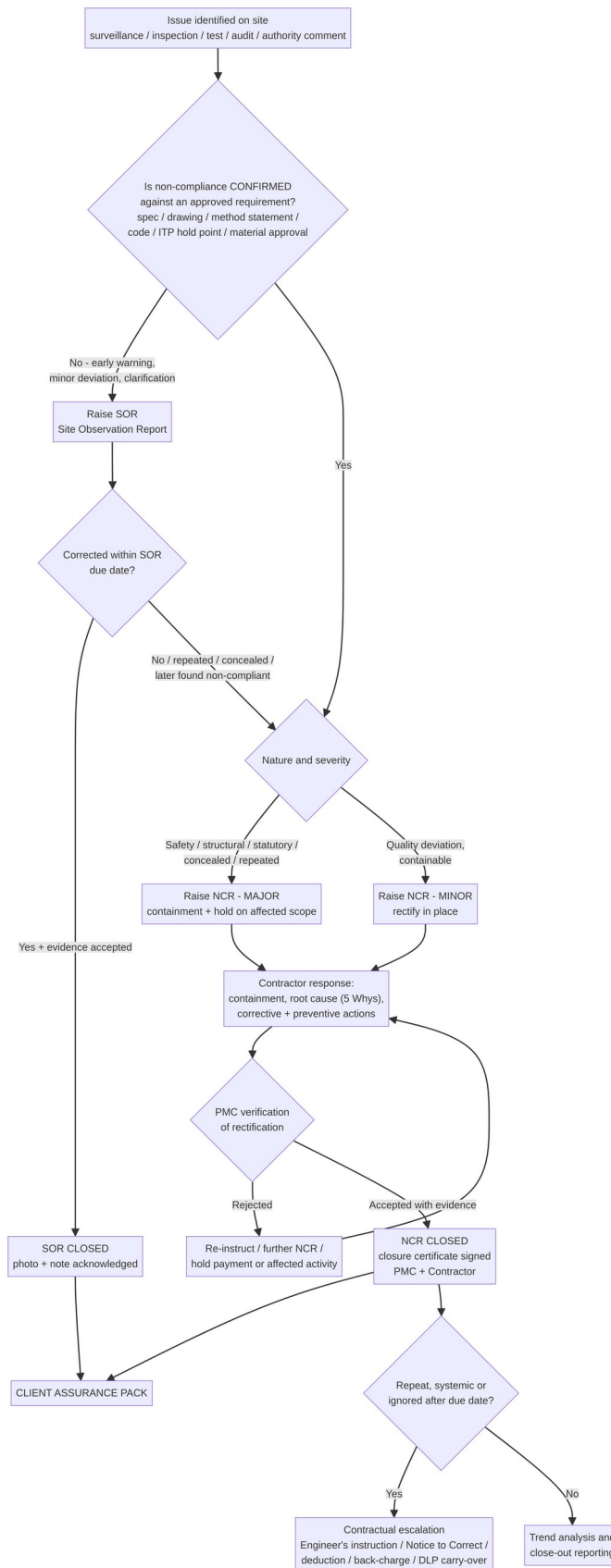


Figure 4.1 - From observation to contractual escalation: the decision path and escalation ladder

Table 4.4 - The escalation ladder and its triggers

Rung	Instrument	Trigger to move to this rung	Consequence	Who authorises
1	Verbal comment, corrected immediately	Obvious minor issue noticed during walk-through	None, provided it is corrected before the next inspection	Any inspector or engineer
2	SOR	Deviation, shortfall or improvement need that is not a confirmed non-compliance	Logged item with a due date and photographic closure	Any PMC engineer or inspector
3	NCR - Minor	Confirmed non-compliance that is containable and does not affect safety, structure or statutory approval	Formal record, rectification, verification, closure certificate	PMC Quality Manager or Resident Engineer
4	NCR - Major	Non-compliance affecting safety, structural integrity, statutory compliance, or involving concealment or repetition	Containment, hold on the affected scope, root cause analysis, CAPA, possible cost and time impact	PMC Resident Engineer with Project Director informed
5	Contractual instruction or Notice to Correct	Non-compliance not remedied within the required time, or a systemic failure of the contractor's quality system	Contractual notice, potential deduction, suspension of the affected scope, or payment hold	PMC Project Director, on behalf of the Employer or Engineer
6	Deduction, back-charge or claim	Cost incurred by the Employer or third parties as a result of the non-compliance	Financial recovery and evaluation in the periodic payment certificate	Employer, on the Engineer's recommendation
7	Defects liability regime	Item unresolved at taking-over, or a defect arising after taking-over	Managed under the defects correction regime, with retention or security as leverage	Engineer, in accordance with the contract

4.5 Where SOR and NCR sit among all site records

SOR and NCR are the two quality instruments, but they are not the only records on site. Confusing them with each other, or with closeout and defects records, is one of the most common sources of argument on UAE projects.

Table 4.5 - Choosing the right record for the right problem

Record	Purpose	Typical trigger	Payment impact	How it closes
Observation or SOR	Early control and correction	Minor deviation, early warning, clarification	Usually none	Photograph, note and acceptance by the inspector

Record	Purpose	Typical trigger	Payment impact	How it closes
NCR	Formal control of confirmed non-compliance	Failed test, rejected inspection, missed hold point, unapproved material, concealed deviation	Commonly yes, by hold or deduction	Verified re-inspection or re-test plus a signed closure certificate
Snag or punch list	Closeout completion of otherwise compliant works	Incomplete or finishing items before handover	Indirect, through retention and final payment	Punch closure sign-off at handover
Defect record (defects liability period)	Post-taking-over correction	Defect found after taking-over or during operation	Commonly yes, through retention or security	Rectification and confirmation under the defects regime
Notice to Correct	Contractual enforcement	Failure to comply with a contractual obligation after warning	Escalation route, potential termination trigger	Compliance, or the contractual remedy that follows
Field change or site instruction	Approval of a deviation in advance	Site condition preventing compliance with the approved design	Variation evaluation where entitled	Approved instruction and revised documentation
Authority NOC or permit condition	Statutory compliance	Requirement imposed by a regulator or utility	Indirect, through connection, occupancy and completion certificate	Authority-issued NOC, certificate or approved inspection record

5. Contractual and Regulatory Basis in the UAE

5.1 The FIDIC clause map

Most UAE projects are delivered under FIDIC-based conditions, frequently the 1999 or 2017 editions of the Red, Yellow or Silver Books, with Particular Conditions that amend, delete or renumber clauses. The clauses below are those a PMC will rely on when issuing and closing SOR and NCR records. Clause numbering differs between editions, so the project's own conditions must always be checked.

Table 5.1 - FIDIC provisions that support observation and non-conformance control

Clause (FIDIC 2017 unless noted)	What it establishes	How the PMC applies it to SOR and NCR
4.9 Quality management and compliance verification systems	The contractor must operate a quality management system and a compliance verification system, with inspection and test plans and self-checking	The first thing to audit when non-conformances are rising. Failures of the contractor's own inspection system are recorded as systemic non-conformances against clause 4.9, not as individual workmanship items
7.1 Manner of execution	Work must be executed in accordance with the specification, applicable codes and good industry practice	The reference clause when the non-compliance is workmanship or method rather than material
7.3 Inspection	The Engineer and Employer's personnel are entitled to inspect and examine the works at any time	Basis for unannounced inspection, and for refusing to accept work that was concealed before inspection

Clause (FIDIC 2017 unless noted)	What it establishes	How the PMC applies it to SOR and NCR
7.4 Testing	Testing by the contractor, including the consequences of failure to pass a test	Failed tests are the classic trigger for a major NCR; the re-test regime must be agreed in writing
7.5 Defects and Rejection (1999: 7.5 Rejection)	The Engineer may reject plant, materials, design or workmanship that fails to comply, and may require re-testing after a failure	The formal basis for rejecting work and requiring correction; the NCR is the quality record that evidences the rejection
7.6 Remedial Work	The Engineer may instruct, by notice, the removal and making good of work that does not comply, and the cost falls on the contractor where attributable	Where the contractor fails to respond, the corrective action is converted into a formal instruction under this clause
11 Defects after Taking Over	The defects regime: completing outstanding work, remedying defects, cost allocation during the defects liability period	Unclosed NCRs at taking-over must be scheduled, priced and carried into this regime; the closure dossier supports the position taken
15.1 Notice to Correct	The Employer or Engineer may give notice requiring the contractor to correct a failure to comply with an obligation within a stated time	The escalation instrument when non-conformances are ignored; it must not be replaced by yet another NCR
3.2 Engineer's instructions (1999: 3.3)	The contractor must comply with instructions given in accordance with the contract	The vehicle for written correction instructions once the response period has passed
13.1 / 13.2 Variations and value engineering	Change mechanisms	Used where the agreed correction changes scope, sequence, or the permanent works, so that approval is obtained before execution
20.2 Claims	Claims and notices regime, with strict time bars	A reminder that a non-conformance may generate a contractor claim for time or cost, and that the PMC must protect the client's position by keeping contemporaneous records

Edition warning

Clause numbers and wording change between the 1999 and 2017 editions and are frequently amended by Particular Conditions. Before using any clause reference in an NCR, notice or report, confirm the reference against the executed contract documents for the project.

5.2 The statutory layer: federal, emirate and free zone

Layered underneath the contract is a regulatory framework that is not uniform across the Emirates. The table below identifies the layers. Detailed authority coverage, including the instruments each authority issues and the evidence it accepts, is in Section 12.

Table 5.2 - The regulatory layers of a UAE construction project

Layer	Examples	What it obliges the project to do	Evidence that satisfies it
Federal	UAE Fire and Life Safety Code of Practice; MoIAT / ESMA product conformity; MOCCAIE environmental protection; MoHRE labour and WPS; GCAA aviation and height restrictions	Comply with federal codes, use conformity-assessed products, protect the environment, employ lawfully, respect aviation and height constraints	Civil Defence approvals and inspections, conformity and certification certificates, environmental permits and monitoring records, labour records, aviation NOCs
Emirate municipality or planning authority	Dubai Municipality; Department of Municipalities and Transport and Abu Dhabi City Municipality; Sharjah Municipality; Ajman Municipality and Planning Department; RAK Municipality Department; Fujairah Municipality; UAQ Municipality	Build under a permit, comply with the applicable building code and permit conditions, permit inspection, apply for completion	Building permit and approved drawings, inspection records, Building Completion Certificate or equivalent
Free zone or developer authority	Trakhees and the Ports, Customs and Free Zone Corporation; Dubai Development Authority; JAFZA; DMCC; DAFZA; Dubai South; KEZAD and Abu Dhabi Ports; Hamriyah Free Zone; SAIF Zone; RAKEZ; Fujairah Free Zone	Comply with the free zone's own design, construction and completion regime, which may replace or supplement the municipality	Free zone permits, inspections, NOCs and certificate of completion
Civil Defence	Dubai Civil Defence; Abu Dhabi Civil Defence Authority; Sharjah and Northern Emirates Civil Defence	Fire and life safety compliance in design, installation, materials and operation	Drawing approvals, installation inspection records, fire system test certificates, civil defence completion or fire safety certificate
Utilities and telecom	DEWA; SEWA; EtihadWE; ADDC; AADC; TRANSCO; Empower; Tabreed; Emicool; e&; du	Comply with connection and protection requirements; avoid damage to existing infrastructure	Connection and energisation approvals, meter installation, clearance NOCs, infrastructure protection NOCs
Roads, transport and access	RTA Dubai; Integrated Transport Centre Abu Dhabi; municipal roads departments; police	Obtain approval for works affecting roads, traffic, closures and access	Road and traffic NOCs, approved traffic management plans, reinstatement acceptance
Sustainability, conformity and OSH	Estdama Pearl Rating System (DMT); Al Safat and the Dubai Green Building System; ADQCC; Dubai Central Laboratory; EAD; OSHAD-SF and emirate OSH regimes	Demonstrate sustainability commitments, product conformity and safe systems of work	Pearl rating or green building submissions and construction credit evidence, conformity and test certificates, OSH inspection and audit records

5.3 When a quality record must become a contractual notice

The most expensive mistake a PMC can make is to believe that a well-maintained NCR register preserves the client's contractual rights. It does not. Time bars and notice requirements are strict, and an NCR is not a substitute for them.

Table 5.3 - Separating the quality record from the contractual notice

Situation	Quality record	Contractual instrument also required
Works found non-compliant against the specification or drawings	NCR with clause, drawing and ITP references	None required to reject; an instruction may be needed to require removal and making good
Contractor fails to respond to an NCR within the response period	NCR remains open, aged and escalated	Written instruction to correct; consider a Notice to Correct under the contract
Contractor repeatedly fails to comply with its quality or inspection obligations	Systemic NCR class	Notice to Correct, and possibly certification implications under the contract
Non-compliance creates additional cost for the Employer, such as third-party testing	NCR records the cause	Back-charge or deduction processed through the payment certification route
Non-compliance affects completion, an authority approval or a milestone	NCR and linked authority NOC tracker entry	Extension-of-time analysis, delay notice and programme impact assessment
Non-compliance discovered after taking-over	Defect record under the defects regime	Notice under the defects clause, and cost allocation where the defect is the contractor's responsibility
The contractor claims time or cost because of a required correction	NCR and instruction record	Evaluate and respond to the claim in accordance with the claims and determination provisions

6. Where Observations Come From, and What Closes Them

Observations and non-conformances arrive from seven sources. The PMC should treat each source with the same triage rules but different evidence expectations, because the closure evidence must satisfy the party who raised the issue. Where an authority or the client raised it, only the authority's or client's own acceptance will close it in their eyes.

Table 6.1 - Sources of observations and their closure expectations

Source	Typical findings	Who must accept closure	Closure evidence expected
PMC daily surveillance and inspection	Workmanship, protection, sequencing, housekeeping, documentation gaps	PMC inspector or engineer	Photographic evidence, inspector confirmation, register update
ITP hold point and witness inspections	Failed inspection, missed hold point, work covered before inspection	PMC, and the client where the ITP requires witnessing	Signed inspection record, re-inspection, test report, client witness signature
Testing and commissioning	Failed pressure test, failed concrete strength, failed functional test, failed energisation	PMC and the authority where the system is statutory	Third-party or accredited laboratory report, calibrated instrument records, re-test certificate

Source	Typical findings	Who must accept closure	Closure evidence expected
Documentation and submittal review	Material not approved, superseded drawing used, method statement not approved, certificate missing	PMC, and the authority where the material is regulated	Approved submittal, conformity certificate, revised and approved document
Authority inspections	Municipality or civil defence comments, utility NOC conditions, non-compliant installation	The authority itself	Authority inspection report, approved re-inspection, authority-issued NOC or certificate
Client or Employer's Representative	Design intent not met, unacceptable finish, operational requirement not satisfied	The client	Client witness or written acceptance, plus the PMC's verification record
Contractor self-reporting and lessons learned	Internally identified defect or process failure	PMC, as the verifying party	Contractor's non-conformance report, evidence pack, PMC verification and closure

The rule of the raiser

Whoever raises the item is the party whose acceptance closes it. An authority finding is not closed by the PMC's own inspection; it is closed when the authority's own inspection, NOC or certificate confirms it. Build the evidence pack around that party's requirements from day one.

7. How a PMC Should Apply SOR and NCR

This section is the operating model. It is written so that it can be lifted directly into a project quality management plan, with the registers, forms and KPIs supplied in the companion workbook.

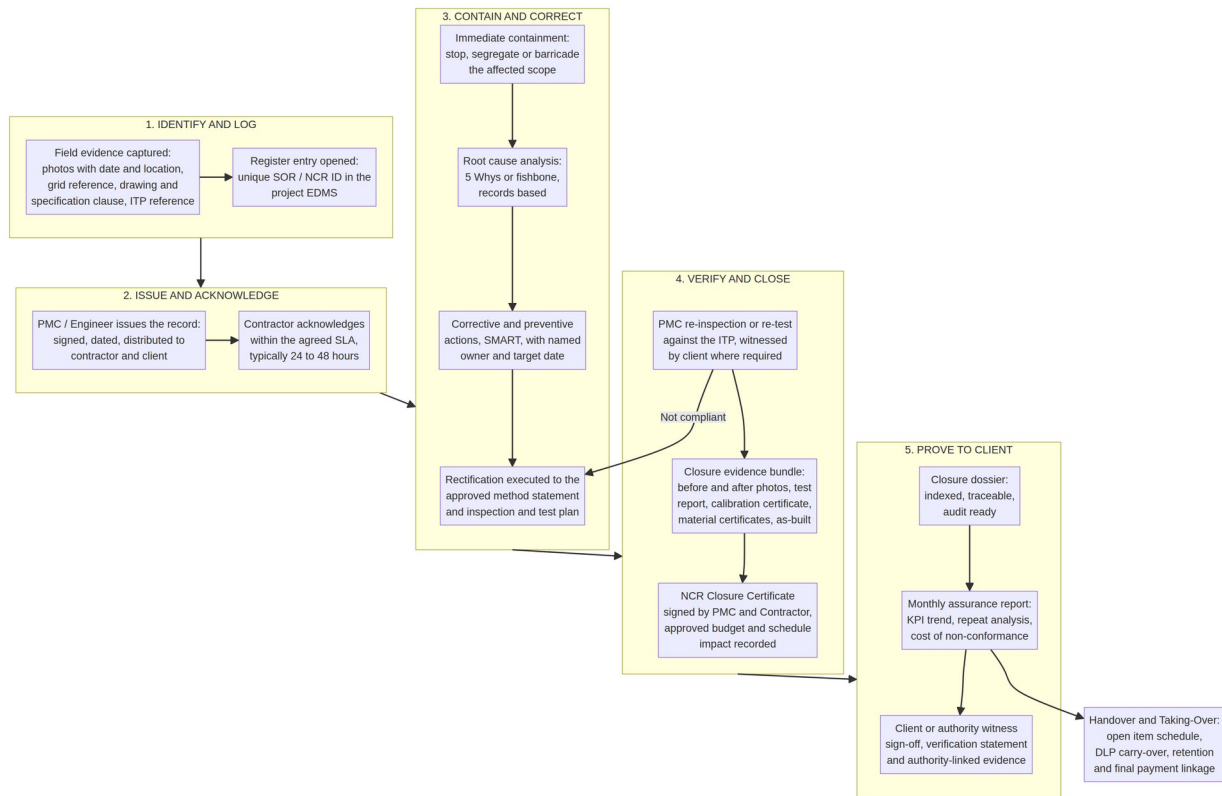


Figure 7.1 - The five-stage lifecycle a non-conformance must pass through before it can be called closed, and the point at which the client sees it

7.1 Governance: who may issue what

Authority to issue must be delegated in writing and recorded in the project quality plan. If anyone can issue an NCR, NCRs become noise; if only the most senior person can, they arrive too late to be useful.

Table 7.1 - Delegation of authority to issue observations and non-conformances

Level	Who	May issue	Must approve before issue	Must be informed
Field level	PMC discipline engineer, inspector, clerk of works, HSE officer	SOR, and HSE observation	Nothing. Logged in the register on the same day	Discipline lead
Discipline level	PMC discipline lead or senior engineer	SOR and, where evidence is already conclusive, a recommended NCR	Quality Manager for the NCR	Resident Engineer
Project level	PMC Quality Manager, Resident Engineer	NCR Minor and NCR Major, re-tests, holds	Resident Engineer for NCR Major	Project Director, client notified in the monthly report

Level	Who	May issue	Must approve before issue	Must be informed
Employer level	PMC Project Director, acting on behalf of the Employer or Engineer	Contractual instruction, Notice to Correct, deduction recommendation	Employer, where the contract requires it	Client, contractor's head office where appropriate

7.2 Triage: the decision rules that keep classification consistent

Triage is where most projects fail. Two engineers must be able to look at the same situation and reach the same classification. The rules below should be published as a one-page decision aid and displayed in the site office.

Table 7.2 - Triage examples

Situation on site	Correct instrument	Reasoning
Sealant gap at a window frame, not yet a leak, easily corrected	SOR	Visible deviation, low risk, no confirmed non-compliance with a testable requirement
Rebar cover measured below the specified minimum on a slab	NCR Minor	Confirmed non-compliance with a specified tolerance; containment possible and rectification is straightforward
Concrete cube results below the specified characteristic strength	NCR Major	Confirmed non-compliance with structural implications; requires investigation, structural review and authority-facing evidence
Fire stopping omitted at a service penetration in a rated wall	NCR Major	Statutory and life-safety non-compliance; the fire code and the civil defence approval are engaged
Material delivered that is not on the approved material register	NCR Minor, with hold	Non-compliance with the approved submittal; material must be segregated and removed or approved retrospectively by the correct route
An ITP hold point covered before inspection	NCR Minor, escalate to Major if repeated	Non-compliance with the approved inspection regime; the works cannot be accepted on the basis of undocumented inspection
Housekeeping or storage shortfall with no impact on the finished works	HSE or site observation	Corrected by supervision; not a quality non-conformance unless it results in damaged or contaminated work
Work is acceptable but not to the finish the client expects	SOR, and client expectation recorded	Not a specification non-compliance unless the specification requires the standard claimed; the PMC should obtain the client's written expectation and, if necessary, price a variation
A repeated SOR on the same subcontractor and same defect	NCR, with a systemic element	Repetition shows a failure of the contractor's control system, not an isolated workmanship lapse
Work executed to a superseded drawing revision	NCR Major	Design control failure; requires engineering assessment before acceptance
Lack of an inspection record for work that is subsequently verified as compliant	NCR Minor, documentation class	The compliance verification record is missing; the contractor must reconstruct and justify it, and the PMC must record the gap

7.3 Mandatory content of each record

A record that lacks the reference to the requirement and the acceptance criterion cannot be closed objectively, and will be argued about later. The fields below are the minimum.

Table 7.3 - Minimum content of a Site Observation Report

Field group	SOR - mandatory fields
Identification	SOR number; date and time of observation; project and package; discipline
Location	Block, level, grid, room or drawing reference, with a marked-up plan or photograph location
Observation	Clear factual description of what was seen, and what is expected instead
Reference	Specification section, drawing number and revision, method statement, code reference or good-practice reference
Evidence	Photograph with date and location; measurement where relevant
Action	Required action; responsible party; due date; risk rating if corrected late
Status tracking	Open, closed, overdue, escalated to NCR; closure photograph reference; closing inspector and date

Table 7.4 - Minimum content of a Non-Conformance Report

Field group	NCR - mandatory fields
Identification	NCR number; date raised; raised by; reviewed and issued by; class (minor, major, systemic); discipline and package
Subject	Concise title of the non-conformance
Location	Exact location, drawing number and revision, grid reference or system tag
Requirement breached	Contract clause, specification section, drawing, ITP hold point, approved method statement, code or authority condition, quoted precisely
Evidence of non-compliance	Photographs with metadata, test report, inspection record, measurement with instrument and calibration reference, material batch details
Extent and containment	Quantity and extent affected; whether work is stopped, segregated or held; reference to any hold notice
Consequence assessment	Effect on safety, structural adequacy, statutory compliance, programme, cost, and the client's operational requirements
Contractor response	Containment action; root cause analysis; corrective action; preventive action; responsible persons; target and actual completion dates
Verification	Acceptance criteria; verification method; re-inspection or re-test record; verification date; verified by
Closure	Evidence bundle index and references; closure date; NCR Closure Certificate reference; signatories; any residual action and its owner

Field group	NCR - mandatory fields
Commercial and programme record	Whether cost or time is affected; back-charge reference; programme impact reference; linkage to variation or instruction

7.4 Numbering, registers and the single source of truth

Table 7.5 - Identification conventions

Item	Convention	Example
SOR number	Project code - SOR - package or discipline - sequential number	PRJ1-SOR-ARC-0142
NCR number	Project code - NCR - class or discipline - sequential number	PRJ1-NCR-MEP-0037
Authority-linked item	Authority code appended to the parent record	PRJ1-NCR-MEP-0037-DCD
Evidence reference	Parent record ID plus stage and sequence	PRJ1-NCR-MEP-0037-EV-03
Closure certificate	Parent record ID plus C	PRJ1-NCR-MEP-0037-C
Register location	One controlled register per type in the project EDMS; the PMC register is the master	EDMS / 04-Quality / Registers

The PMC register is the master record. The contractor is required to mirror the same numbering in its own system and to submit responses through the EDMS so that the audit trail is automatic. Spreadsheet-based tracking is acceptable only if the workbook is version-controlled and a PDF snapshot is issued weekly.

7.5 Response times and service levels

Table 7.6 - Internal service levels

Action	Responsible	Target time
Observation logged after the inspection	PMC inspector	Same working day
SOR issued and distributed	PMC inspector	Within 1 working day of observation
Contractor corrects a minor SOR	Contractor	Within 3 working days, or by the next inspection cycle
Contractor acknowledges an NCR in writing	Contractor QA/QC	Within 24 to 48 hours
Containment of a major NCR	Contractor	Immediate, and confirmed in writing within 24 hours
Root cause, corrective and preventive action submission	Contractor QA/QC	Within 7 days for minor, 14 days for major, or as stated in the quality plan
PMC review of the contractor response	PMC Quality Manager	Within 3 working days of receipt
Re-inspection and verification	PMC, with client witness where specified	Within 5 working days of the contractor's completion notice
Closure certificate issued	PMC	Within 3 working days of successful verification
Escalation of an overdue NCR	PMC Resident Engineer	Automatically at 7 days past the agreed completion date

7.6 Classification of non-conformances

Table 7.7 - Non-conformance classes

Class	Definition	Examples	Required response	Approval to close
Minor	Non-compliance with limited effect, contained and corrected without affecting safety, structural adequacy, statutory approval or the client's operational requirements	Workmanship outside tolerance but within structural limits, minor documentation gaps, unapproved minor product substitution that can be resolved	Corrective action, verification, closure certificate	PMC Quality Manager
Major	Non-compliance affecting safety, structural adequacy, statutory compliance, water-tightness, fire performance, energy performance, or the client's ability to occupy or operate	Failed structural test, omitted fire stopping, incorrect MEP installation, superseded drawing used, concealed work	Containment, root cause analysis, corrective and preventive action, third-party verification where required, client notification	PMC Resident Engineer with Project Director informed; client notified
Systemic	Failure of the contractor's management system, shown by repetition, pattern or absence of control	Repeated same defect across the project, no functioning internal inspection, no material control, consistent failure to respond	System-level corrective action, revised procedures and training, audit of the contractor's quality management system, performance notice	PMC Project Director, and reporting to the client
Documentation-only	The works are compliant but the required verification record is missing or deficient	No inspection record for verified work, missing test certificate, unsigned record	Reconstruction and justification of the record, amended procedure to prevent recurrence	PMC Quality Manager, countersigned by the Resident Engineer

7.7 Root cause and corrective action

A non-conformance is not closed by fixing the symptom. It is closed when the PMC is satisfied that the cause has been understood and that recurrence is controlled. The five-why technique is the minimum accepted; escalation to a broader analysis is expected for major and systemic items.

Table 7.8 - The minimum acceptable root cause analysis

Step	Question to answer	Evidence of a good answer
Immediate cause	What physically failed or deviated?	Specific and factual, with location and quantity
Why 1 to 5	Why did it happen, and why did the previous answer happen?	A chain that ends at a controllable cause such as supervision, method, competence, material control, design information or inspection regime, not at human error alone
Contributing factors	What allowed it to escape detection?	Reference to the failed control: no checklist, no inspection, no approval, unclear drawing, wrong revision

Step	Question to answer	Evidence of a good answer
Corrective action	What will be done to the affected works?	A specific, measurable action with an owner and a date, tied to the approved method
Preventive action	What changes so this does not recur, anywhere on the project?	A change to a procedure, a checklist, a training record, a material control step or a supervision arrangement, verifiable by inspection of the record
Verification of effectiveness	How will the PMC know the preventive action worked?	A defined observation window, audit or follow-up inspection with a result recorded

The test of a credible preventive action

If the preventive action cannot be seen in a document, a checklist, a training record or a physical control on site, it is a promise rather than an action. The PMC should reject preventive actions expressed as "will be more careful" or "will instruct the team" without a verifiable change.

7.8 Verification and the standard of proof for closure

Closure is an act of verification, not an act of administration. The PMC should define, in advance and by category, what evidence will be accepted as proof that a non-conformance is closed. The table below is the recommended standard.

Table 7.9 - Closure standards by category

Category	Acceptance criterion	Verification method	Minimum evidence to close
Workmanship and finish	Compliant with the specification and the approved sample or benchmark	Visual inspection by the PMC, benchmark comparison	Before and after photographs with metadata, inspection record, benchmark reference
Structural and geotechnical	Verified against design requirements and the relevant code	Re-test, non-destructive testing, structural review by the designer, witnessed inspection	Third-party or accredited test report, designer's review and confirmation, re-inspection record
Fire and life safety	Compliant with the fire code and the authority approval	Inspection by the PMC and, where required, by Civil Defence; system testing	Test certificate, authority inspection record or NOC, approval of the amended drawings
Mechanical, electrical and plumbing	Systems installed, tested and commissioned to specification	Witnessed and documented testing, commissioning records, balancing reports	Test and commissioning report, calibrated instrument records, approved as-built markups
Materials and products	Compliant with the approved material and conformity requirements	Certificate review, sampling and laboratory testing, conformity assessment	Conformity certificate, test report, approved submittal
Statutory and authority findings	Accepted by the authority	Authority re-inspection or desk review	Authority letter, NOC or certificate, or approved inspection record
Documentation	Record reconstructed and the control gap closed	Review of the reconstructed record against the design and as-built condition	Justification statement, supporting test or inspection evidence, procedure revision
Interface and access	Resolved and confirmed by the affected party	Joint inspection and written confirmation	Signed joint inspection record, NOC from the affected party

7.9 Reporting cadence

Table 7.10 - Reporting rhythm

Report	Frequency	Audience	Content
Daily surveillance log	Daily	PMC internal, contractor's site team	Observations raised, immediate corrections, areas of concern
Weekly quality report	Weekly	PMC management, contractor's management	SOR and NCR movements, overdue items, top five recurring issues, activities at risk, inspections planned
Weekly closure clinic	Weekly	PMC and contractor quality teams	Ageing list, blockers, evidence gaps, items for joint verification
Monthly quality assurance report	Monthly	Client, PMC management, contractor's head office	KPIs with trend, itemised open NCR list, closed items with evidence references, repeat analysis, cost of non-conformance, authority NOC status
Handover or completion quality dossier	At completion and taking-over	Client, and the authority where relevant	Closure certificates, evidence index, open item schedule with dates, defects register, authority certificates
Lessons learned report	Quarterly and at completion	Client, PMC, contractor	Systemic causes, corrective actions taken, changes to procedures and specifications

7.10 Escalation, and the limits of the NCR

Table 7.11 - Escalation actions

Trigger	PMC action	Record created
SOR not closed by the due date	Reminder to the contractor's quality manager; escalate to daily site meeting	SOR status change and notification
SOR repeated or ignored twice	Convert to an NCR	New NCR referencing the SOR history
NCR not acknowledged within 48 hours	Written notice to the contractor's project manager; engineer's instruction to respond	Instruction referenced in the NCR
NCR not remedied by the agreed date	Issue a written instruction to correct; withhold valuation of the affected item	Instruction and payment note
Systemic or repeated failure	Notice to Correct under the contract; recommend a management-system audit	Contractual notice and audit report
Cost incurred by the Employer or a third party	Compile the cost record and recommend a deduction or back-charge	Back-charge statement in the payment certificate
Item unresolved at taking-over	List it, price it, schedule it and carry it into the defects regime; the client is informed in writing	Open item schedule and defects register entry

7.11 Interface with client inspections and authority visits

1. **Pre-inspection readiness.** The PMC runs its own inspection against the authority's checklist before requesting an authority visit, and records the result. Authority visits should not be used as a discovery mechanism for basic non-compliances.
2. **One-PMC front.** A single nominated PMC representative accompanies every client or authority inspection, records every comment, and issues the resulting observation or non-conformance itself, so that the record and the numbering stay under PMC control.
3. **Immediate triage of authority comments.** Each comment is classified the same day, with an owner, a due date and the evidence that the authority will accept.
4. **No self-closure.** The PMC does not record an authority-linked item as closed until the authority's own instrument exists. Until then the item is open with the status awaiting authority acceptance.
5. **Witness registers.** For ITP hold points requiring client or authority witnessing, the witness signature and the date are captured in the same visit, not reconstructed afterwards.

7.12 What the PMC must never do

Table 7.12 - Practices to avoid

Anti-pattern	Why it damages the client	Correct practice
Closing items on the contractor's word	The client inherits a claim that cannot be defended	Require objective evidence for every closure, without exception
Backdating records or photographs	Destroys the credibility of the entire register and exposes the PMC	Record the date and time through the EDMS and preserve original metadata
Issuing NCRs without a requirement reference or acceptance criterion	The contractor cannot know what compliance looks like, and closure becomes subjective	Quote the clause, drawing revision and ITP reference, and state the acceptance criterion
Using NCRs to punish the contractor	Creates an adversarial project, delays closure and inflates claims	Use observations first; reserve NCRs for confirmed non-compliance
Accepting cosmetic closure after a substantive failure	The client's operation and the authority's approval are both at risk	Match the verification method to the technical category in Table 7.9
Allowing the register to become a historical archive with no ageing discipline	Overdue items surface at handover as a crisis	Age weekly, escalate on the defined ladder, report the ageing to the client monthly
Treating the NCR as a contractual notice	The client's rights under the contract may be lost to a time bar	Issue the contractual instrument separately and cross-reference the NCR
Silence about open items in client reporting	Destroys trust when the client discovers them	Disclose every open item with status, evidence and a recovery date

8. Helping the Contractor Clear the Items

The PMC's contractual duty is verification. Its practical interest is closure. A PMC that helps the contractor close items faster is not weakening its position; it is protecting the client's programme, avoiding disputes over ageing records, and producing a clean compliance file for handover. The approach below supports the contractor without lowering the standard of evidence.

8.1 Coach before you escalate

1. Explain the requirement at the point of issue, not in the closure meeting. Most unclosed items are the result of a misunderstood requirement rather than a refusal to comply.
2. Agree the acceptance criterion in writing when the observation is raised. If the contractor knows what "closed" looks like, closure becomes a production task rather than a negotiation.
3. Use the same language as the specification. Referring to "good workmanship" invites argument; referring to a clause number ends it.
4. Separate the technical issue from the commercial issue. The contractor should never feel that admitting a non-conformance will automatically result in a deduction, or it will dispute every record.

8.2 The first 48 hours

Table 8.1 - A disciplined first 48 hours

Timeframe	PMC action	Contractor action
Hour 0 to 4	Record the finding with evidence, classify it, issue it, and hold the affected scope if required	Stop the affected activity, segregate non-compliant material and protect adjacent works
Hour 4 to 24	Confirm containment is in place; agree the acceptance criterion and the verification method with the contractor	Acknowledge the record in writing, appoint a single owner, and submit the containment record
Day 1 to 2	Review the containment photographically; agree the rectification method statement if one is required	Submit the method statement and the proposed programme for the corrective action
Day 2 to 3	Approve the method statement or return it within the agreed service level	Mobilise labour, materials and access so that the corrective action is not delayed by logistics

8.3 The weekly closure clinic and backlog burn-down

A standing weekly meeting, chaired by the PMC Quality Manager, converts the register from a complaint list into a work plan. The meeting has one output: a dated commitment for every open item, with the evidence required named explicitly.

Table 8.2 - Weekly closure clinic

Standing agenda item	Output expected	Who attends
Ageing review by bucket: under 7 days, 7 to 15, 15 to 30, over 30	Named owner and recovery date for every item over 15 days	PMC Quality Manager, PMC discipline leads, contractor QA/QC manager
Blockers and dependencies	Resolution route for items blocked by design information, access, materials or authority availability	PMC design lead, contractor planner, procurement
Evidence gaps	List of items awaiting verification or missing evidence, with the specific document required	PMC inspectors and contractor document controller
Authority-linked items	Status of every NOC, inspection and certificate required from a regulator or utility	PMC authority liaison, contractor authority coordinator
Backlog burn-down target	A weekly closure target agreed in numbers, not in sentiment	PMC Quality Manager and contractor project manager

Standing agenda item	Output expected	Who attends
Trend and repeat analysis	Identification of systemic causes requiring preventive action rather than individual corrections	PMC Quality Manager, contractor project manager

8.4 Making closure administratively easy

Table 8.3 - Practical support that accelerates closure

PMC provision	Effect on the contractor	Effect on the client
Pre-agreed evidence pack list per category	No guesswork about what to submit	Consistent, auditable closure files
One-window submission route in the EDMS	One submittal instead of parallel email chains	A single traceable record
Standard evidence naming convention (Appendix D)	Fast document preparation and retrieval	Simple audit sampling
Closure certificate template issued in advance	Administrative step is instant	Signed, dated proof for each item
Joint verification windows published weekly	Predictable re-inspection scheduling	Client can witness without disruption
Two-day turnaround commitment on method statement review	No idle time waiting for approvals	Programme protection
Sample closure dossier for a typical item	Clarity of standard expected	Reproducible quality across packages

8.5 Handling commercially sensitive non-conformances without creating claims

Table 8.4 - Managing the commercial dimension

Situation	Wrong approach	PMC approach that protects the client and keeps the contractor engaged
A structural non-conformance requiring redesign or strengthening	Issuing an NCR and waiting for the contractor to propose a solution	Jointly agree the investigation scope, obtain the designer's position early, and record agreed cost and time treatment in the same instruction so that the commercial argument does not delay the technical fix
Repeated non-conformance by a subcontractor	Multiple NCRs against the same subcontractor	One systemic NCR against the contractor, with the subcontractor's pattern as evidence, and a requirement for a change in supervision or removal of the non-compliant subcontracted activity
Non-conformance caused partly by late design information	Pushing the full corrective cost onto the contractor	Record the design-information dependency honestly in the NCR. Defensibility depends on the record being accurate, and partial responsibility is normal in complex works

Situation	Wrong approach	PMC approach that protects the client and keeps the contractor engaged
Non-conformance discovered after the contractor has demobilised part of the workforce	Insisting on immediate rectification with no access or resource plan	Agree a rectification plan with dates compatible with the programme, and record it; the client's interest is correction, not confrontation
Non-conformance with an authority-facing condition	Managing it as a purely internal quality item	Treat the authority condition as a deadline, present the correction jointly to the authority, and attend the re-inspection together

8.6 Warning signs that the contractor is not engaging

Table 8.5 - Early warning signs

Symptom	What it usually means	PMC action
Acknowledgements without corrective action	No internal ownership or resource commitment	Escalate to the contractor's project manager, and require a named owner and programme in the next submission
Repeated requests for clarification of the requirement	The requirement was not communicated properly at issue	Reissue with a quoted clause and an agreed acceptance criterion; hold a joint site walk
Photographs submitted without date or location	Weak evidence culture, or avoidance of accountability	Reject the evidence and restate the evidence standard in the response template
Closure claimed without re-inspection	The contractor's internal inspection is not functioning	Audit the contractor's quality management system and issue a systemic NCR where justified
Ageing increases while new items are raised faster	The contractor is raising its own observations to dilute the register	Report ageing and closure rate separately from volume; measure the ratio of closures to new items
Authority comments remain outstanding across several visits	Coordination failure between design, site and authority liaison	Establish a joint authority tracker with the contractor and review it at the weekly clinic

9. Proving Genuine Closure to the Client

The client does not want reassurance; the client wants proof. Proof is not a statement that an item has been closed in the register. It is a chain: a defined requirement, evidence that the works did not comply, evidence of the correction, verification by a competent party against stated criteria, and acceptance by the party who raised the finding. Where an authority was involved, proof includes the authority's own instrument.

9.1 The three tests of proof

Table 9.1 - Genuine closure

Test	Question the client will ask	What satisfies the test
Technical proof	Is the works actually compliant now?	Verification against the correct acceptance criteria by a competent and, where required, independent party, using calibrated equipment and the approved method
Evidential proof	Can I see it, and can I test it?	A complete, dated, indexed evidence bundle produced contemporaneously and retained in the EDMS with an unbroken audit trail
Statistical proof	Is closure systemic or anecdotal?	KPIs showing closure rates, ageing, repeat rate and cost of non-conformance over time, with consistent improvement and transparent disclosure of open items

9.2 The evidence hierarchy

Table 9.2 - Ranking evidence by evidential weight

Strength	Type of evidence	Typical use	Limitations
Level 1 - authoritative	Authority-issued NOC, certificate, approval or inspection record; accredited third-party test report; witnessed test with the client or authority representative present	Statutory items, structural items, fire and life safety, utility connections, handover	Dependent on the authority's timetable; must be planned early
Level 2 - verified	PMC documented re-inspection against the ITP with stated acceptance criteria; calibrated instrument readings; approved as-built markup; approved material conformity certificates	Workmanship, installation, materials, commissioning	Requires disciplined contemporaneous recording and a competent verifier
Level 3 - corroborative	Contractor's method statement and process records such as batch tickets, pressure charts, torque logs, with before and after photographs carrying date and location metadata	Support for a Level 1 or Level 2 conclusion	Not sufficient on its own for a substantive non-conformance
Level 4 - weak	Written statements, undated photographs, verbal assurances, retrospective narratives	Only as background	Should never be the basis of a closure recorded by a PMC

9.3 The closure dossier

Every non-conformance should have a single closure dossier that a third party can read without asking questions. The dossier can be digital, but its structure must be fixed and its index generated from the register.

Table 9.3 - Contents of an NCR closure dossier

Section	Content	Why the client cares
1. Identification	NCR number, date raised, class, discipline, location, raised by and issued by, with signatures	Establishes the item and the authority under which it was raised
2. Requirement breached	Extract of the specification clause, drawing number and revision, ITP reference, code reference or authority condition	Shows the standard against which compliance is measured
3. Evidence of non-compliance	Photographs with metadata, test results, measurements, inspection records	Demonstrates that the finding was factual and contemporaneous
4. Containment record	Evidence of stop, segregation or protective measures, with dates	Shows the problem was stopped from spreading or being concealed
5. Root cause analysis	Five-why chain and the contributing control failures	Shows understanding rather than guesswork
6. Corrective action record	Approved method statement, execution records, material certificates, revised drawings	Shows the correction was engineered, not improvised
7. Preventive action record	Changes to procedures, checklists, training, supervision or material control, with dates	Shows recurrence is controlled - the client's real concern
8. Verification record	Re-inspection or re-test report, acceptance criteria, results, verifier name and qualification, instrument and calibration reference, witness signatures	Provides the independent or PMC confirmation that compliance was restored
9. Authority instrument	NOC, certificate, approval letter, or authority inspection record where applicable	Confirms statutory acceptance, without which the client cannot occupy or connect
10. Closure certificate	Signed certificate with the closure date and residual conditions, if any	The single document the client's auditor will look for
11. Commercial and programme record	Cost treatment, back-charge reference, programme impact, claim reference	Closes the loop between the technical event and the contract

9.4 The NCR closure certificate

Table 9.4 - NCR closure certificate content

Field	Content	Signed by
Header	Project, contract, NCR number and title, class, date raised	PMC document controller
Statement of closure	Statement that the non-conformance has been addressed in accordance with the approved corrective action and that the works now comply	PMC verifier and reviewer
Basis of verification	Reference to the re-inspection or re-test record, acceptance criteria and result	PMC verifier
Preventive action confirmed	Reference to the procedural change and the date it took effect	Contractor quality manager

Field	Content	Signed by
Residual conditions	Any monitoring, watch item or outstanding documentation, with dates and owners	PMC and contractor
Evidence index	List of attached evidence references	PMC document controller
Signatures	Contractor quality manager, PMC verifier, PMC quality manager, and the client's representative where the client raised the item or requires witness	Named individuals with dates

9.5 Formal verification statements and client sign-off

Table 9.5 - The documents the client actually accepts

Instrument	When used	Content
NCR closure certificate	Every non-conformance	Item-by-item closure with verification basis and evidence index
Monthly quality assurance statement	Every month	Signed statement by the PMC Project Director that the reported closed status is accurate, supported by the register extract and the evidence index
Client witness record	Items where the client requires witnessing	Signed record of the witnessed re-inspection or re-test, with the date and the client representative's name
Authority acceptance record	Authority-linked items	Copy of the authority's NOC, certificate, approval or inspection record
Package close-out certificate	At completion of each package or system	Confirmation that all observations and non-conformances in the package are closed or scheduled, with a list of any carried-over items
Handover quality dossier transmittal	At taking-over	Formal transmittal listing closure certificates, the open item schedule with dates, and the defects register

9.6 Statistical proof: what to measure and how

Table 9.6 - Key performance indicators and how they are calculated

KPI	Definition	Formula for the register	Target direction
SOR raised and closed	Volume of observations by discipline and month	Count of SOR IDs by month of raising and month of closure	Closed volume keeps pace with raised volume
SOR closure within due date	Percentage closed on or before the due date	Closed on time divided by total closed, per month	Above 90 percent
SOR to NCR conversion rate	Percentage of observations that escalate to a non-conformance	SORs converted divided by total SORs raised in the period	Falling, but never at the cost of hiding real non-compliance
NCR closure rate	Cumulative percentage of non-conformances closed	Cumulative closed divided by cumulative raised	Above 95 percent with nil substantive items open
Mean time to close	Average calendar days from raising to verified closure	Average of closure date minus raising date, by class	Under 21 days for minor, under 45 days for major

KPI	Definition	Formula for the register	Target direction
Overdue ageing	Open items past the agreed completion date, in buckets	Count of open items with days elapsed, grouped 0 to 7, 8 to 15, 16 to 30, over 30	No item over 30 days without a documented recovery plan
Repeat rate	Percentage of non-conformances repeating a previously closed cause	Items flagged as repeat divided by total closed in the period	Below 5 percent and falling
Cost of non-conformance	Value of rework, third-party testing, back-charges and delay attributable to non-conformance	Sum of recorded costs against non-conformance IDs	Disclosed transparently; used to justify prevention investment
Inspection pass rate	Percentage of ITP inspections accepted at first presentation	First-time accepted inspections divided by total inspections	Above 90 percent
Authority-linked closure	Percentage of authority-related items closed with the authority's own instrument	Items closed with an authority instrument divided by authority-linked items raised	100 percent before completion

9.7 Traceability: from the authority's comment to a signed closure

The table below is a worked illustration of the chain the client should be able to follow without leaving the register. It is the format the companion workbook produces automatically.

Table 9.7 - A traceable closure chain

Stage	Record	Owner	Evidence attached	Client-visible output
Finding	Civil Defence inspection comment on a fire-rated penetration	Authority, recorded by the PMC	Authority inspection report	Monthly report entry with the authority reference
Classification	NCR raised as major, class code NCR-MAJ-FLS	PMC Quality Manager	Photographs, drawing and fire code reference	Itemised in the open NCR list
Containment	Affected ceiling void isolated, programme of adjacent works held	Contractor	Containment photographs and hold notice	Status update in the weekly report
Correction	Fire stopping installed to the approved detail and certified product	Contractor	Product conformity certificate, method statement, installation record	Evidence index entry
Verification	PMC re-inspection and system test, client witness attended	PMC, with client witness	Re-inspection record, test certificate, witness signature	Closure certificate with client signature
Authority acceptance	Civil Defence re-inspection accepted	Authority, coordinated by the PMC	Authority inspection record or NOC	Copy in the handover dossier
Preventive action	Fire stopping added to the hold point list with photographic verification before ceiling closure	PMC and contractor	Revised ITP and checklist	Stated in the monthly report and the lessons-learned log
Closure	Non-conformance closed	PMC Quality Manager	Complete dossier, closure certificate	Signed closure certificate and KPI update

9.8 Audit trail, metadata and dispute defence

1. **Preserve original metadata.** Photographs and test records must retain their original creation data. Exporting, compressing or re-saving can strip the evidence value.
2. **One system of record.** If a finding is discussed by email but recorded nowhere else, it does not exist. The register is the system of record and the email trail is only a supporting reference.
3. **Version control.** Superseded evidence and superseded responses are retained, not deleted, so that the history of the item is reconstructable.
4. **Signed, not asserted.** Verifications and closures are signed by named individuals with a position and a date.
5. **Retention schedule.** Registers, dossiers and certificates are retained for the period required by the contract and the authority, and in any event for the full defects liability period plus the limitation period applicable to the project.
6. **Access discipline.** The client should have read access to the register from the start of the project. Assurance is far more credible when it is not a monthly reconstruction.

9.9 The monthly client assurance pack

Table 9.8 - Contents of the monthly assurance pack

Page or section	Content	Purpose
1. Executive statement	Signed statement by the PMC Project Director on the accuracy of the quality position	Accountability
2. Dashboard	Observations and non-conformances raised, closed, open and overdue, with the trend for the last twelve months	Immediate situational awareness
3. Open item register	Every open item with age, class, owner, target date and current blocker	Transparency, and a basis for escalation by the client if needed
4. Closed items this month	List of closures with evidence reference and the verification method used	Proof of progress
5. High-risk and authority-linked items	Items affecting safety, structure, statutory approval or handover, with the authority instrument status	Protection of the client's critical path
6. Repeat and systemic analysis	Patterns identified, preventive actions taken, and their verification status	Evidence of learning, not just fixing
7. Cost and programme effect	Cost of non-conformance and any programme impact, with references	Commercial awareness
8. Assurance activities	Audits, surveillance, witness points and third-party tests carried out	Demonstration of control
9. Declarations and exceptions	Any matter the PMC considers unverifiable, disputed or outside its control	Honest disclosure that protects both parties

10. KPIs, Targets and Assurance Metrics

A KPI is useful only if it changes behaviour in the right direction. Counts alone encourage under-reporting. The PMC should therefore pair volume measures with quality measures, and always disclose open items.

Table 10.1 - Using KPIs without distorting behaviour

Metric	Why it matters	Unintended consequence to watch for	Balancing measure
Number of NCRs raised	Shows how much non-compliance is being detected	Encourages suppression of findings	Pair with SOR volume and inspection pass rate; reward detection and closure, not low counts
Closure rate	Shows the system is working, not just recording	Encourages premature closure	Report closure only with verified evidence references, and audit a sample monthly
Mean time to close	Measures responsiveness	Encourages closing the easy items and ignoring the hard ones	Report ageing distribution and the oldest ten items by name
Repeat rate	Shows whether prevention is real	Encourages re-labelling repeats	Audit the root cause field for consistency
Cost of non-conformance	Links quality to money	Encourages disputes over classification	Agree the recording rules in advance and apply them consistently
Inspection pass rate	Measures the contractor's self-control	Encourages fewer, larger inspections	Track inspection coverage against the approved ITP

11. How to Read the UAE Authority Landscape

The United Arab Emirates does not have a single national building inspector. Federal bodies set or administer selected cross-emirate requirements such as product conformity, the fire code framework, environmental law, labour safety, aviation and federal roads. The building permit, inspection and completion route, however, is normally controlled by the relevant municipal authority, development authority, free zone, utility or asset custodian. A master developer, port, free zone or infrastructure operator may add a further approval route without replacing the statutory one.

The practical consequence for a PMC is that an observation or a non-conformance is not closed merely because the contractor has repaired the works or a consultant has signed a photograph. The defensible chain is: applicable requirement or permit condition, then corrective action, then objective test or reinspection, then approval by the issuing authority or asset custodian, and finally a controlled as-built and handover record. A building completion certificate does not automatically close fire, utility, road, environmental, estate or operational conditions unless the applicable process says that it does.

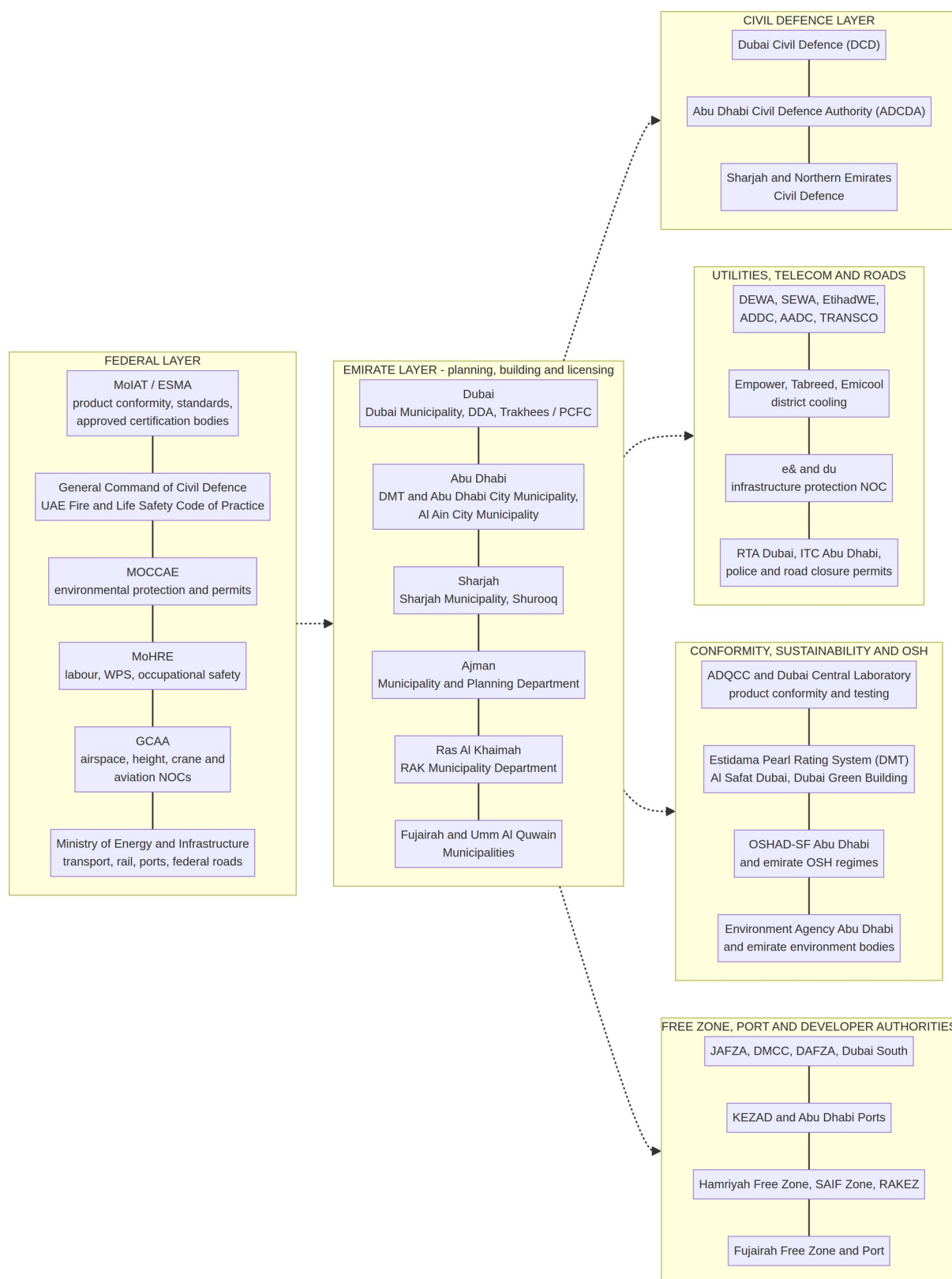


Figure 11.1 - The layered UAE authority landscape that a PMC must map at project start

Use of uncertainty

Where research did not identify a universal public service card or a fixed certificate title, the matrix says verify current requirement. That is deliberate: authority service routes change, and the PMC should confirm the live permit matrix, service channel and plot conditions rather than invent a completion instrument.

12. Master UAE Authority Matrix

The matrix below is the reference set for a UAE construction project. It identifies each authority, what it regulates, when it engages the project, how it links to observations and non-conformances, the evidence that closes an item, and the final completion or handover instrument. It is reproduced in editable form in the companion workbook, where project-specific additions can be made.

Reading the matrix: the evidence column states what the PMC must hold before marking the item closed. Where an authority instrument is named, nothing less than that instrument closes the item in the authority's view.

12.1 Federal authorities

Federal bodies set requirements that cross emirate boundaries. They rarely issue a building completion certificate, but their conditions can block occupation, energisation or operation, so an item linked to a federal requirement stays open until the issuing body's own instrument exists.

Table 12.1 - Federal authorities: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
MoIAT / ESMA legacy function	Ministry of Industry and Advanced Technology; Emirates Authority for Standardization and Metrology legacy function	UAE.S standards, technical regulations, product conformity and product safety	Design, procurement, import, delivery and installation	Missing conformity, wrong model, unapproved substitution, invalid label or untraceable batch is a procurement/installation NCR	UAE Certificate of Conformity (ECAS) where applicable, accredited-laboratory report, declaration of conformity, approved submittal and batch/serial traceability	Product conformity file; not a general building completion certificate
General Command of Civil Defence / UAE Fire Code framework	General Command of Civil Defence; implemented through the relevant emirate Civil Defence authority	UAE Fire and Life Safety Code of Practice: escape, alarm, suppression, passive protection and construction fire safety	Fire design, material approval, installation, testing and completion	Fire-stopping, doors, risers, pumps, hydrants, alarms and access are authority-sensitive hold points	Approved fire drawings, inspection records, commissioning/test certificates and as-built fire plans	Relevant emirate Civil Defence completion, clearance or compliance certificate
MOCCAE	Ministry of Climate Change and Environment	Environmental licensing/EIA, pollution, waste and discharge controls	Feasibility/EIA, construction environmental management and operation	Dust, wastewater, spoil route, waste, contaminated soil, noise and marine-impact breaches remain NCRs until conditions are evidenced	Applicable environmental licence/EIA approval, environmental management plan, manifests, laboratory results, monitoring reports and inspection outcome	Final environmental clearance only where issued by the competent authority; verify current requirement
MoHRE	Ministry of Human Resources and Emiratisation	Labour, workplace OHS, accommodation/welfare and heat-stress controls	Mobilisation, construction, camp operation and incident follow-up	Unsafe lifting, excavation, scaffolds, PPE, welfare, incident and midday-break findings require risk removal, not a toolbox talk alone	Corrective-action inspection record, JSA/risk assessment, training/competency, equipment certificates, incident close-out and welfare evidence	Enforcement/corrective-action record; no general building completion instrument

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
GCAA	General Civil Aviation Authority	Aerodrome obstacle limitation surfaces, cranes, temporary structures, marking and lighting	Planning near aerodromes, crane/height approval, temporary works and aviation commissioning	Height, crane, lighting, laser, dust and work-method non-compliances are controlled conditions beyond local building approval	Applicable GCAA/air-navigation approval or NOC, approved coordinates/heights, aeronautical survey, obstacle-lighting test and removal record	Aviation release or aerodrome/operator acceptance; not a general building certificate
MoEI	Ministry of Energy and Infrastructure; federal transport/road functions	Federal-road access, crossings, drainage, utilities and reinstatement NOCs	Pre-construction NOC, crossings/access, construction and final inspection	Road crossing, access, protection-zone or reinstatement breach is an NOC-condition NCR	Original NOC, approved traffic/utility drawings, inspection and reinstatement records, as-builts	Completion of Non-Objection Certificate where MoEI is the issuer
Ministry of Economy and Tourism	Ministry of Economy and Tourism	Commercial, supplier, warranty and consumer-protection framework	Supplier appointment, commercial supply and warranty period	Supports supplier identity/warranty evidence; does not technically close an installed-work NCR	Trade licence, contract/invoice, warranty and recall/corrective-action record, with technical conformity evidence from the competent body	Commercial/warranty record; no construction completion certificate
UAE Cabinet / federal legislation	UAE Cabinet and federal legal framework	Federal laws, executive regulations, fees and technical/product-control decisions	Regulatory mapping, product controls and changes needing legal/technical approval	Each NCR must cite the governing law, Cabinet decision, technical regulation or permit condition; consultant approval cannot override a mandatory rule	Official law/Cabinet reference, authority correspondence, conformity or recall/withdrawal evidence and accepted risk assessment where permitted	No project completion instrument; applies through the competent issuing authority

12.2 Dubai

Dubai has several parallel approval routes. Establish first whether the plot sits under Dubai Municipality, the Dubai Development Authority, Trakhees and the Ports, Customs and Free Zone Corporation, or a named free zone; then confirm whether Civil Defence, the RTA and the utility conditions form separate files.

Table 12.2 - Dubai: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
Dubai Municipality (DM)	Dubai Municipality, Buildings Regulation and Permits Agency	Building permits, technical inspections, registration and building completion	Design/permit, construction inspections and occupancy/completion	Approved drawings, Dubai Building Code requirements, inspection hold points and permit conditions define corrective work	DM inspection result, approved inspection request, stamped as-builts and supporting tests	DM Building Completion Certificate
DDA	Dubai Development Authority	Planning, construction permits, inspections, building completion and tenant fit-out	Permit, structural/final inspection, fit-out and handover	Major comments must be closed; approved drawings, survey and structural completion are release criteria	DDA inspection records, approved drawings, consultant compliance, DCD, sewer, traffic and owner evidence as applicable	DDA Building Completion Certificate or DDA Fit-out Completion Certificate

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
Trakhees / PCFC	Trakhees Civil Engineering Department, Ports, Customs and Free Zone Corporation	Construction/modification permits and NOCs, inspections and compliance	Before construction/fit-out, site inspections and before occupation	Work is checked against approved drawings, Modification Permit/NOC and regulations; pending comments require reinspection	Approved inspection status, reinspection record, approved drawings, system download and relevant clearances	Modification Completion Certificate (MCC); occupation/use/storage is prohibited before issue
DCD	General Command of Dubai Civil Defence	Fire/life-safety engineering, fire systems, hazardous materials and emergency readiness	Design review, installation/testing and final inspection before occupancy	Fire-stopping, alarms, sprinklers, smoke control, pumps, exits and signage are fire hold points	Approved DCD drawings, witnessed inspection/test and commissioning records	DCD Civil Defence completion/fire-safety certificate required by the applicable completion route
RTA Dubai	Roads and Transport Authority	Roads, right-of-way, traffic/access, utilities interfaces and rail protection	Traffic/access design, NOC review, construction and phased monitoring near assets	NOC conditions govern methods, surveys, risk assessment, monitoring and asset protection; a material change can require resubmission	Current approved design/construction/rail NOC, inspection/site release, traffic approval and monitoring/as-built reports	Relevant RTA road/ROW/rail NOC close-out, clearance or accepted reinstatement record
DLD / RERA	Dubai Land Department / Real Estate Regulatory Agency	Project registration, escrow/developer oversight, purchaser-facing status and property registration	Registration, sales/escrow monitoring, completion/status reporting and downstream unit registration	Not normally a technical SOR/NCR inspector; project status must not be used as technical acceptance	DLD Project Status Enquiry, developer completion submissions and registration/title evidence as applicable	Downstream registration/status evidence; not a substitute for DM/free-zone/Civil Defence completion
JAFZA	Jebel Ali Free Zone Authority	Estate access, lease, modification/fit-out permissions, HSE and NOCs	Before modification/fit-out, during estate controls and at occupation handover	The zone approval is separate from statutory approvals; its published modification NOC is a scope-control gate	Zone-issued modification NOC, inspection/clearance and applicable external certificates	JAFZA modification/fit-out approval or handover letter as applicable; verify current requirement
DMCC	Dubai Multi Commodities Centre authority	Estate, lease, fit-out/construction, access and HSE controls	Before fit-out/modification, during estate inspection and handover	Zone permit conditions and approved fit-out scope remain separate from DM/DCD/utility conditions	Current zone NOC/fit-out approval, inspection/clearance and applicable statutory approvals	Zone handover/trade or fit-out approval; verify current requirement
DAFZA	Dubai Airport Freezone Authority	Estate, lease, fit-out/construction, access and HSE controls	Before fit-out/modification, during estate inspection and handover	Zone permit conditions and approved scope form separate acceptance criteria	Current zone NOC/fit-out approval, inspection/clearance and applicable statutory approvals	Zone handover/trade or fit-out approval; verify current requirement
Dubai South	Dubai South master/free-zone authority	Estate, lease, construction/fit-out permissions, access and HSE	Before works, during estate inspection and at handover	Do not assume a DM/DCD approval replaces the estate-specific NOC or approved scope	Current zone NOC/fit-out approval, inspection/clearance and applicable statutory approvals	Zone handover/trade or fit-out approval; verify current requirement
Expo City Dubai	Expo City Dubai master/free-zone authority	Estate, lease, construction/fit-out permissions, access and HSE	Before works, during estate inspection and at handover	Estate interface and approved fit-out scope remain distinct from statutory approvals	Current zone NOC/fit-out approval, inspection/clearance and applicable statutory approvals	Zone handover/trade or fit-out approval; verify current requirement
Dubai Central Laboratory	Dubai Central Laboratory, Dubai Municipality	Municipal material/product conformity and testing services	Material submittal, source approval, sampling/testing and material-NCR disposition	Material NCRs require quarantine, traceable sampling, replacement/approved disposition or compliant testing	Recognised lab report, product conformity/approval evidence, chain-of-custody and consultant/authority acceptance	Test/conformity record; no unsupported "Central Laboratory completion certificate"; verify current requirement

12.3 Abu Dhabi

Abu Dhabi routes municipal approvals through the Department of Municipalities and Transport and its municipalities, with Civil Defence, the Department of Energy, utilities, environmental and sustainability requirements as discrete files that municipal completion does not close.

Table 12.3 - Abu Dhabi: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
DMT	Department of Municipalities and Transport	Planning, municipal development controls, permits and completion processes	Planning/design, permitting, construction inspection and completion/handover	Permit conditions, approved drawings, inspections and unapproved changes create observations/NCRs	Approved permit/as-builts, inspection records and approved amendments	Municipal certificate-of-completion file/service, as applicable
ADCM	Abu Dhabi City Municipality	Municipal building control, permit review, site work, completion and occupancy	Permit review, site inspection and completion/occupancy	Municipal comments and permit conditions require corrective work and reinspection; photographs alone do not close them	Municipality inspection/approval record, approved as-builts and completion documentation	Municipal/TAMM completion or occupancy documentation
ADCDA	Abu Dhabi Civil Defence Authority	Fire prevention, life safety, evacuation and firefighting systems	Design approval, installation/testing and pre-occupation	Fire-stopping, alarms, sprinklers, pumps, emergency lighting and access are inspected hold points	Approved fire drawings, inspection/test and commissioning records	ADCDA Certificate of Compliance / Fire Safety and Protection Equipment certificate
ADQCC / QCC	Abu Dhabi Quality and Conformity Council	Product conformity, technical regulations, testing and Trustmark/conformity schemes	Before incorporation of specified products and during surveillance	Wrong model, expired certificate, nonconforming batch or missing traceability requires quarantine, replacement and/or retest	Valid Product Conformity Certificate, accredited-lab report, batch records and approved material submittal	Product-conformity record; no building completion certificate
EAD	Environment Agency – Abu Dhabi	Environmental permitting, impacts, waste, emissions, biodiversity and protected areas	Feasibility/EIA, pre-construction approval and construction monitoring	Dust, noise, waste, discharge, habitat and spill-control permit conditions become NCR criteria	Environmental permit/NOC, monitoring, waste records, compliance report and inspection outcome	Environmental clearance/acceptance where the permit provides one; verify current requirement
ADOSH / OSHAD	Abu Dhabi Occupational Safety and Health Center / Abu Dhabi OSH System Framework	Emirate OSH framework and construction Codes of Practice	Before mobilisation and continuously during construction	Audits/inspections create corrective actions; OSH-CMP requires response timelines and corrective-action reporting	Live/approved OSH-CMP, audit/inspection reports, training, incident and corrective-action reports	Authority/SRA acceptance where required; otherwise controlled OSH close-out record
Estdama Pearl Rating System	DMT-administered sustainability rating system and Pearl Assessor process	Sustainability design, construction and operation rating requirements	Design rating, construction evidence collection and completion before handover	Missed credits, substitutions, commissioning and as-built deviations are sustainability NCRs	PQP quality-checked submission, product/test/commissioning records, as-builts/photos and Pearl Assessor decision	Pearl verification/rating decision; not a substitute for statutory completion
ADIBC	Abu Dhabi International Building Code; enforced by the applicable building official	Building minimums, permits, inspections, occupancy, utilities and violations	Design approval through final inspection and occupancy	Work must remain accessible until approved; concealed work without inspection can require opening-up	Permit, required inspection approvals, approved tests and as-builts	Certificate of occupancy/completion through the competent municipal process

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
DoE Abu Dhabi	Department of Energy	Energy-sector technical regulation and safe electrical installations	Electrical design, installation, testing and energisation	Unlicensed work, failed insulation/earth tests, unapproved equipment and unnotified alterations are electrical NCRs	Licensed-contractor test forms, distributor inspection/test acceptance and energisation/connection approval	Applicable distribution-company completion/connection evidence; verify current requirement
Al Ain City Municipality	Al Ain City Municipality	Municipal planning/building control, permits, inspections and completion	Permitting, inspections and completion throughout the project	Correct municipal file, permits and local inspection requirements govern deviations; Abu Dhabi City documents are not interchangeable	Approved permit, inspection records and as-builts	Al Ain municipal completion/occupancy documentation
Abu Dhabi Ports / KEZAD	Abu Dhabi Ports / Khalifa Economic Zones Abu Dhabi	Plot, access, utility interface, logistics, HSE and tenant/operational controls	Plot/design interface, construction access, tie-ins and operational handover	Lease, plot, utility and interface NOCs create project-specific hold points	Signed NOCs, approved methods, zone inspection and commissioning/tie-in acceptance	KEZAD/port contractual handover or operational acceptance; verify current requirement
Masdar / Masdar City	Masdar / Masdar City master developer	Estate design, sustainability, utilities interfaces and fit-out controls	Master planning/design through tenant fit-out and handover	Developer comments, Pearl commitments, estate interfaces and fit-out conditions require separate closure from statutory approvals	Approved design/fit-out package, closed tracker, estate NOCs and commissioning evidence	Masdar handover/tenant acceptance; statutory certificates remain separate

12.4 Sharjah

Sharjah combines municipal control with Civil Defence, SEWA, the roads and transport authority, and free-zone or master-developer requirements that operate as separate release gates.

Table 12.4 - Sharjah: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
Sharjah Municipality	Sharjah City Municipality	Building/construction permits, approved plans, municipal inspections and completion certification	Design/permit, construction inspections, as-built review and completion	Permit conditions, approved plans, systems/products and site inspections govern deviations and NCRs	Municipal inspection record, approved as-built/revised drawings, tests and photographs	Official building completion certificate
Sharjah Civil Defence Authority	Sharjah Civil Defence Authority / General Directorate of Civil Defence jurisdiction	Fire/life safety, alarms, firefighting, smoke control, access and applicable central gas systems	Fire strategy/design, installation hold points, testing, completion and occupancy	Fire stopping, fire doors, cause-and-effect, hydrant flow, gas and access defects require corrective action and reinspection	Approved drawings, compliance evidence, inspection and commissioning/maintenance records	Civil Defence compliance and building/gas-system completion certificate, coordinated with municipality approval
SEWA	Sharjah Electricity, Water and Gas Authority	Electricity, water and gas network connection, capacity, metering and technical installations	Design/connection applications, utility works, testing, inspection and energisation	Routes, loads, earthing, pressure tests, meter rooms and materials are utility hold points	SEWA NOC/connection approval, inspection and test results, meter/energisation record and applicable as-built/clearance	Utility connection/final clearance; building completion remains municipal

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
SRTA	Sharjah Roads and Transport Authority	Road corridors/right-of-way, entrances, excavations, utility crossings, temporary occupation and reinstatement	Design NOC before road work, work-zone control and reinstatement inspection	NOC drawings, traffic/side-digging control, asset protection and reinstatement define NCR close-out	SRTA NOC, engineer inspection/reinstatement acceptance and deposit-release evidence where applicable	ROW NOC close-out/reinstatement acceptance
Shurooq	Sharjah Investment and Development Authority	Master-developer/client controls for tourism, heritage, public realm and investment assets	Concept, design, construction, commissioning, operator acceptance and handover	Project brief, conservation, sustainability, quality and public-interface conditions create PMC inspection points	Developer acceptance, punch-list close-out and external municipal/Civil Defence/utility/environmental evidence	Shurooq handover/operation approval together with statutory approvals
HFZA	Hamriyah Free Zone Authority	Free-zone engineering, construction/development planning and EHS	Building permit, construction, completion inspection, plant readiness and operation approval	Building permit, service inspection/testing and EHS conditions are staged release gates	HFZA inspection/test records, service NOCs and EHS documents	HFZA Building Completion Certificate , then separate Operation Permit
SAIF Zone	Sharjah Airport International Free Zone Authority	Lease/licensing, facility and EHS controls for offices, warehouses and industry	Fit-out/factory construction, EHS inspection, operation and licence renewal	EIA topics, waste, chemicals, proposals and EHS inspections create observation/NCR obligations	SAIF NOC/lease & licensing approval, EHS clearance, safety-fitness evidence and external certificates as applicable	Licence/renewal and operational acceptance; external statutory completion may also be required
BEEAH / environment	BEEAH Environment	Environmental studies, waste management, waste permits/manifests, monitoring and remediation support	Planning/EIA, construction waste, commissioning and operational controls	Waste, dust/noise, discharge, contaminated soil and chemical issues require manifests and monitoring—not cleanliness photographs	Environmental study/approval where required, BEEAH manifest/acceptance, monitoring/remediation report and authority record	Environmental clearance from competent statutory authority where required; BEEAH is not a substitute regulator

12.5 Ajman and Umm Al Quwain

These emirates rely on the municipal department, Civil Defence, EtihadWE and their respective free zones. Several public service routes are not published in detail, so the PMC must confirm the current instrument with the authority rather than assume one.

Table 12.5 - Ajman and Umm Al Quwain: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
Ajman MPD	Ajman Municipality & Planning Department	Land use, planning, building permits, municipal inspections and completion certification	Design approval, construction inspection and handover	Approved drawings, permit conditions, waterproofing and inspection reports are hold points	Building inspection reports, water-insulation guarantee, Civil Defence letter, Roads & Infrastructure clearance, sewerage-certified form and Makani number	Official Certificate of Completion after MPD site inspection

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
Ajman Civil Defence	General Directorate of Civil Defence / Ajman Civil Defence	Fire/life-safety design, systems and preventive-safety compliance	Design review, installation/testing and pre-occupation/operation	Fire stopping, rated doors, alarms, sprinklers, pumps, egress and emergency systems require approved drawings and witnessed tests	Approved fire drawings, conformity evidence, test records and inspection/letter	Applicable building/gas-system completion certificate and/or preventive-safety compliance certificate supporting MPD completion
Ajman Free Zone	Ajman Free Zone / Free Zones Authority of Ajman	New-building NOCs and major fit-out permits, including structural, fire, MEP and layout change	Before work starts and during technical review/inspection	Work may not start before approval; scope, risk assessment, Civil Defence drawings and added load are change-control criteria	Electronic New Building NOC or approved Major Fit-Out Permit, with written inspection/completion acceptance if issued	Free-zone written acceptance; do not treat trade licence as construction completion certificate; verify current requirement
Ajman Port	Ajman Port	Port land, marine, logistics, security, traffic, access and utilities interfaces	Before/during port-area works and at handback	Port NOCs, work permits, inductions, traffic plans and reinstatement conditions are acceptance criteria	Port work/access NOC, inspection sign-off, reinstatement and joint handback records	Port handback/clearance letter where applicable; verify current requirement
Umm Al Quwain Municipality	Municipality of Umm Al Quwain	Municipal/urban-planning permits, contractor/consultant controls, inspection and completion	Planning/design approval, construction inspection and completion	Stamped permit, approved drawings and field comments govern deviations, setbacks and structural/MEP records	Inspection reports, approved revisions and relevant utility/Civil Defence clearances	Municipal building-completion certificate or permit close-out if issued; verify current requirement
UAQ Civil Defence	Umm Al Quwain Civil Defence	Fire/life safety blueprint approval, system testing and preventive-safety compliance	Design, installation/testing and pre-occupation/operation	Fire systems, occupancy, hazardous storage, access and cause-and-effect need traceable test evidence	Approved drawings, test certificates and Civil Defence inspection/approval	Applicable clearance, completion or preventive-safety certificate; verify current requirement
UAQ FTZA	Umm Al Quwain Free Trade Zone Authority	Free-zone licensing, premises, tenant fit-out/construction controls and operational acceptance	Lease/fit-out before works, access/inspection and handover/licensing	Approved layout, work permit, contractor access and reinstatement obligations are acceptance criteria	Current FTZA premises/fit-out/construction approval, written clearance and external approvals	Handover/operational or licensing acceptance; published profile does not name a construction completion certificate— verify current requirement

12.6 Ras Al Khaimah and Fujairah

Both emirates combine a municipality route with Civil Defence, EtihadWE and free-zone, port or master-developer controls. Ras Al Khaimah additionally applies a green building requirement through the municipality completion process.

Table 12.6 - Ras Al Khaimah and Fujairah: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
RAK Municipality	Ras Al Khaimah Municipality Department – Buildings Administration	Plan audits, building permits, inspections, implementation supervision, standards conformity and completion	Pre-design/permit, construction inspection and final completion review	Approved drawings, permits, specifications, workmanship and site safety drive NCR close-out	Inspector report, approved preliminary handover, Barjeel report/documents and Civil Defence achievement certificate where required	Electronic Building Completion Certificate after review
RAK public-service / utility interfaces	Relevant RAK public-service custodians, including RAKWA, Etisalat and General Resources Authority references in municipal completion process	Service corridors, public infrastructure, utility connection and NOCs	Enabling works, excavation, diversion/tie-in, testing and connection	Protection, installation, testing, reinstatement and as-built observations remain open until asset-owner acceptance	Utility inspection/connection approval, NOC/clearance, tests/commissioning and approved as-built	Utility acceptance plus RAK Municipality completion; exact custodian/process— verify current requirement
RAK Civil Defence	Ras Al Khaimah Civil Defence / General Directorate of Civil Defence jurisdiction	Preventive fire safety, fire engineering, systems approval and inspection	Fire design, installation/commissioning and final fire acceptance	Fire stopping, alarm, sprinkler, smoke control, pumps, exits and emergency lighting need specialist test/reinspection	Approved fire drawings, engineering/achievement evidence, tests and inspection records	Civil Defence completion/achievement and applicable preventive-safety compliance certificate
Marjan	Marjan / Al Marjan Island master developer	Master-developer design, plot/interface, infrastructure, access, coastal and logistics controls	Before design approval through construction/interface and developer handover	Developer NOCs/comments are separate from Municipality approval	Written design/development NOC, approved IFC/interface drawings and inspection sign-offs	Developer clearance/handover where issued, alongside Municipality/Civil Defence certificates; verify current requirement
RAKEZ	Ras Al Khaimah Economic Zone	Plot development, drawing review, building/modification permits, HS&E and staged construction approvals	Before mobilisation; Stage 1 before work, Stage 2 at 6 m and Stage 3 at 24 m/before 30 m; completion/operation	Stage approvals, night work, excavations, hazardous works and HS&E obligations are release gates	Written stage approvals, NOCs, HS&E inspection/operational-fitness evidence, incident and equipment/test records	RAKEZ building/modification completion NOC and operational fitness/acceptance as applicable
Fujairah Municipality	Fujairah Municipality – Engineering and Lands Department, Building Section	New permits, drawing submissions, concrete-pour and building-completion services	Design/permit, construction inspection and final completion	Structural, waterproofing, MEP and concrete defects need permit-aligned test and reinspection evidence	Approved permit/amendments, inspection records, tests and temporary-utility evidence if applicable	Building Completion Certificate
Fujairah Civil Defence	Fujairah Civil Defence / General Directorate of Civil Defence jurisdiction	Fire-preventive safety and fire-system engineering/inspection	Fire design, installation, commissioning, monitoring and final acceptance	Fire systems, compartmentation, cause-and-effect, access and evacuation findings require witnessed tests and reinspection	Approved fire documents, installer/maintenance evidence, tests and inspection records	Civil Defence building/gas-system completion and preventive-safety compliance certificate
FFZA	Fujairah Free Zone Authority	Licensing, premises, fit-out and operational controls; special permits with government departments	Business setup, premises/fit-out, access, utilities, hazardous activity and operational licensing	Fit-out, access, utilities and operational observations can block licensing/occupation even after physical completion	FFZA premises/fit-out/operational approval, lease/licence records and relevant government NOCs	Operational/licensing acceptance; exact construction instrument— verify current requirement
Fujairah Ports Authority / Port of Fujairah	Fujairah Ports Authority / Port of Fujairah	Port land, marine/terminal infrastructure, operational safety, access and interfaces	Before port-area works, during marine/terminal construction and commissioning/operational handover	Port permit, lifting, hot-work, traffic, berth, pipeline, environmental and safety conditions are NCR criteria	Work/access/operational approvals, inspection, commissioning, as-builts, tests and required external clearances	Port commissioning/operational handover acceptance

12.7 Utilities, telecom, roads and infrastructure bodies

These bodies are asset custodians rather than building regulators, and their clearances are the most common cause of a technically complete building being unable to connect, energise or hand over. Each custodian must release its own interface.

Table 12.7 - Utilities, telecom, roads and infrastructure bodies: authorities, SOR and NCR linkage, and closure evidence

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
EtihadWE	Etiihad Water and Electricity, formerly FEWA	Electricity and desalinated-water distribution, connection and activation	Design/interface, utility works, commissioning and occupation	Loads, meters, trenches, chambers, pressure/flow/electrical tests and as-builts are utility hold points	Authority inspection acceptance, approved drawings, tests, meter/connection release and as-builts	Connection/activation/service-release approval; building completion is normally municipal
DEWA	Dubai Electricity and Water Authority	Electricity/water networks, design/NOC, construction, substations, LV/HV inspection and connections	Design/NOC, construction, substation/LV/HV inspection and connection	Material approvals, hold-point inspections and snag notices require rectification and resubmission	Inspection notice/result, approved drawings, site photos, test certificates and portal approval	DEWA connection/supply release, Completion Certificate, As Built Approval and GIS update as applicable
ADDC	Abu Dhabi Distribution Company / TAQA Distribution	Electricity and water distribution	Design NOC, infrastructure installation, inspection, energisation and handover	Materials, pressure/electrical tests, meter/substation readiness and snags require distributor acceptance	Approved materials, inspection requests, tests, signed snag closure and as-builts	Connection/energisation approval, clearance/NOC and accepted as-builts
AADC	Al Ain Distribution Company / TAQA Distribution	Electricity and water distribution	Design, construction, inspection, energisation and handover	Materials, readiness, tests and signed snag closure are utility hold points	Approved materials, inspection requests, test results, connection readiness and as-builts	Connection/energisation approval, clearance/NOC and accepted as-builts
TRANSCO	Abu Dhabi National Energy Company transmission operator	High-voltage electricity and water transmission assets	Proximity, crossing, diversion and protection design/construction	Protection and monitoring conditions are permit hold points	Approved method statement, protection/monitoring records, inspection/test, survey/as-built and written release	Transmission crossing/diversion/protection NOC and handover/acceptance record
TAQA	Abu Dhabi National Energy Company group	Ownership/governance umbrella for operating technical entities	Project-specific; actual asset custodian determines involvement	A generic TAQA reference does not close an NCR: identify ADDC, AADC, TRANSCO or other asset custodian	Entity-specific NOC, inspection and acceptance evidence	Entity-specific connection, clearance, energisation or asset-handover acceptance
Empower	Emirates Central Cooling Systems Corporation	District-cooling networks, energy-transfer stations and customer interfaces	Master planning/design, ETS installation, pressure/flushing, testing and commissioning	Equipment, insulation, hydraulic, controls and interface defects require operator-witnessed evidence	Approved submittals, pressure/flushing reports, inspection, commissioning and BMS records	Operator connection and commissioning/operation acceptance; verify current requirement
Tabreed	National Central Cooling Company	District-cooling plants, networks and customer connections	Design, connection, construction, testing and commissioning	Equipment, hydraulic, insulation and interface NCRs close only through witnessed tests and commissioning	Connection/NOC, test and commissioning records, operator inspection	Operator connection/operation acceptance or handover certificate; verify current requirement
Emicool	Emirates District Cooling	District-cooling networks and customer connections	Design, ETS installation, pressure/flushing tests and commissioning	Material, installation, controls, meter and commissioning observations require operator acceptance	Approved materials, test/commissioning reports and operator inspection	Operator connection/acceptance; verify current requirement

Authority	Full name / responsible entity	What it regulates	When it engages the project	Link to SOR / NCR	Evidence that closes the item	Final completion or handover instrument
e&	e& (Etisalat)	Telecom outside-plant and in-building fibre infrastructure	Early design NOC, material validation, implementation inspection and final testing	Duct routes, components, labels, room conditions and end-to-end tests are closure criteria	Lead-operator inspection, approved materials, test results and as-built/ODF record	Telecom NOC and operator completion/acceptance certificate
du	du / Emirates Integrated Telecommunications Company	Telecom outside-plant and in-building fibre infrastructure	Design NOC, approved materials, implementation and acceptance testing	Wrong route/component, labels, room condition or failed fibre test keeps the item open	Approved drawings/materials, inspection, end-to-end tests and as-builts	Operator completion/acceptance certificate
Etihad Rail	Etihad Rail	Railway right-of-way/protection zones for buildings, bridges, utilities, excavation and machinery	Information/design/construction NOCs and activity-specific releases	Layouts, methods, risk assessments, monitoring and protected-zone conditions are rail hold points	Monitoring data, third-party studies where required, inspection records, as-built survey and written rail release	Activity-specific NOC close-out and rail-interface acceptance/handover
ITC / Abu Dhabi Mobility	Integrated Transport Centre, now Abu Dhabi Mobility	Traffic operations, detours and works in the road right-of-way	Road-work planning, detour application, execution and reinstatement	Barriers, signage, lane geometry, access, timing and safety observations require permit closure	Traffic-control inspection, approved detour completion and safety records	Traffic-detour/road-works permit closure and traffic-management acceptance
Municipal road/drainage departments	DMT/Abu Dhabi, Abu Dhabi City Municipality, Al Ain Municipality, Western Region municipality functions and Dubai Municipality, as applicable	Roads, stormwater/drainage, public realm, trench coordination and asset handover	Planning/design NOC, construction, road/drainage inspection and final handover	Trench, drainage tests, road base/asphalt and reinstatement are municipal hold points	Municipal inspection pass, CCTV/pressure/compaction test as applicable, survey/as-built and handed-over asset record	Municipal road/drainage handover, clearance NOC or phased permit close-out

Cross-emirate rule

A common assumption is that satisfying the municipality closes everything. It does not. The matrix shows repeatedly that municipal or completion certification is one file among several, and that fire, utility, road, environmental, estate and operational acceptance must each be closed separately and evidenced separately.

13. Completion and Handover Sequence by Emirate

Completion is a sequence, not an event. The table below sets out the order in which authorities are normally satisfied in each emirate, and the control points the PMC should check before declaring any related observation or non-conformance closed.

Table 13.1 - Completion and handover sequence by emirate

Emirate or principal route	Completion and handover sequence	PMC control points before declaring SOR or NCR closure
Dubai Emirate	1. Establish the plot/jurisdiction: DM, DDA, Trakhees/PCFC or the named free zone. 2. Secure design/permit and utility/road/rail/fire NOCs. 3. Complete authority inspections, tests and comment clearance. 4. Obtain DM Building Completion Certificate, DDA Building/Fit-out Completion Certificate, or Trakhees MCC as applicable. 5. Obtain estate/utility releases and complete client handover. 6. Use DLD/RERA status/registration only as downstream evidence.	Confirm boundaries and permit issuer; DCD, RTA and free-zone conditions may remain separate. Do not occupy PCFC works before MCC. Reconcile DLD status with technical certificates.
Abu Dhabi Emirate	1. Identify DMT/municipal route: Abu Dhabi City, Al Ain or the project zone. 2. Freeze ADIBC/permit baseline, ADCDA fire approvals, DoE/distributor and EAD requirements. 3. Operate OSH-CMP and Pearl evidence plan where applicable. 4. Close inspections, commissioning, utilities and zone interfaces. 5. Obtain municipal completion/occupancy documentation and separate statutory/estate acceptance.	Keep concealed work available for building-official inspection. Treat ADCDA, EAD, DoE/distributor, Pearl, KEZAD/port and Masdar acceptance as discrete files, not implied by municipal completion.
Sharjah	1. Obtain Sharjah Municipality permit, Civil Defence approval, SEWA/SRTA NOCs and relevant free-zone or Shurooq approvals. 2. Inspect concealed systems and record utility/road/waste evidence. 3. Commission fire and utility systems. 4. Obtain municipal building completion certificate, Civil Defence completion/compliance and utility/road releases. 5. Obtain HFZA operation permit, SAIF licence/EHS clearance or Shurooq acceptance where applicable.	HFZA Building Completion Certificate and Operation Permit are separate. SEWA/SRTA NOC scope and road reinstatement must be closed. A BEEAH manifest does not replace statutory environmental approval.
Ajman	1. Obtain MPD building permit and entity approvals; obtain AFZ permit/NOC or Port approval where relevant. 2. Secure Ajman Civil Defence drawings and EtihadWE interface approvals. 3. Complete inspections, tests, waterproofing and cross-authority clearances. 4. MPD site inspection and Certificate of Completion. 5. Obtain utility activation and free-zone/port handback as applicable.	MPD completion prerequisites include inspection reports, insulation guarantee, Civil Defence letter, road/sewerage evidence and Makani number. Do not start AFZ work before its approval.
Umm Al Quwain	1. Confirm current Municipality and Civil Defence permit/service route. 2. Obtain EtihadWE and UAQ FTZA approvals where relevant. 3. Complete field inspection, fire and utility tests, and record as-builts. 4. Obtain municipal permit close-out/building completion if issued, plus Civil Defence and utility clearances. 5. Obtain FTZA premises/operational acceptance.	Certificate titles and local service channels require verify current requirement . Do not confuse FTZA licensing/handover with municipal or fire completion.
Ras Al Khaimah	1. Obtain RAK Municipality permit and Marjan/RAKEZ/utility/port interface approvals as applicable. 2. Complete RAKEZ stage approvals and HS&E controls where in the zone. 3. Reconcile fire, utility, Barjeel and preliminary-handover evidence. 4. Municipality inspection/review and Building Completion Certificate. 5. Obtain developer/free-zone/utility operational acceptance.	RAK Municipality completion requires preliminary-handover and Barjeel documents; obtain Civil Defence achievement evidence where specified. Treat RAKEZ stages and NOCs as release gates.

Emirate or principal route	Completion and handover sequence	PMC control points before declaring SOR or NCR closure
Fujairah	1. Obtain Fujairah Municipality permit, Civil Defence approval and EtihadWE/FFZA/Port approvals as applicable. 2. Maintain inspection controls for concrete, structural, waterproofing, MEP and port/interface works. 3. Commission systems and obtain fire/utility evidence. 4. Obtain Municipality Building Completion Certificate and Civil Defence certificates. 5. Complete FFZA operational/licensing or Port commissioning handover when applicable.	Municipality completion does not replace FFZA, Port, EtihadWE or Civil Defence acceptance. Confirm the specific FFZA construction close-out instrument— verify current requirement .

14. Codes, Standards and Instruments That Create Obligations

Every non-conformance must reference the instrument that creates the obligation. The table below lists the instruments that most often generate observations and non-conformances in the UAE, and the evidence that proves compliance with each.

Table 14.1 - Compliance instruments and their proof requirements

Code, standard or approval instrument	Issuing authority	What it covers	What evidence proves compliance
UAE.S technical regulations and Federal Product Safety Law	MoIAT; federal legislation	Regulated products, product safety, technical regulations, labels and conformity	ECAS/UAE Certificate of Conformity where applicable, accredited test report, declaration, approved submittal, batch/serial traceability
UAE Fire and Life Safety Code of Practice	General Command of Civil Defence; implemented by emirate Civil Defence	Means of escape, fire alarm/suppression, passive protection, construction fire safety and occupancy	Approved fire strategy/drawings, listed/approved product records, inspection, cause-and-effect, flow/pump/alarm and commissioning certificates, Civil Defence acceptance
Federal environmental law and project environmental permit/EIA	Federal legislation/MOCCAE framework and competent local environmental authority	Environmental licensing, EIA, pollution, waste, discharge, monitoring and protected impacts	Environmental approval/permit, management plan, waste manifests, laboratory results, monitoring reports and authority inspection/clearance
MoHRE occupational safety requirements and annual midday-break controls	MoHRE	Workplace safety, labour welfare/accommodation, heat-stress controls and field enforcement	Risk assessments, permits, training, competency, equipment inspections, welfare records, incident/corrective-action records and time-stamped site evidence
CAR-ADR obstacle-control requirements	GCAA	Aerodrome protected surfaces, obstacle coordinates/heights, marking/lighting and surveys	Applicable aviation NOC, approved coordinates/heights, aeronautical survey, obstacle-lighting test and removal/acceptance record
Dubai Building Code (DBC)	Dubai Municipality	Minimum health, safety, welfare, environmental and sustainable-development requirements for Dubai buildings	Approved DBC-compliant drawings/calculations, permit/inspection records, materials, tests, as-builts and DM completion evidence

Code, standard or approval instrument	Issuing authority	What it covers	What evidence proves compliance
Al Sa'fat – Dubai Green Building System	Dubai Municipality	Dubai green-building requirements; replaced earlier Dubai Green Building Regulations and Specifications from 19 October 2020	Approved sustainability submissions, product evidence, calculations, commissioning and authority-required as-built records
DDA, Trakhees/PCFC and individual Dubai free-zone permit/NOC conditions	DDA, Trakhees/PCFC and the issuing estate/free-zone authority	Local construction, fit-out, modification, HSE, access and estate conditions	Current approved drawings/NOC, inspection/reinspection result, closed comments, external certificates and issued completion/fit-out/estate approval
Abu Dhabi International Building Code (ADIBC)	Abu Dhabi building-control system / competent building official	Permits, inspections, occupancy, utilities, violations and construction minimums	Permit, accessible hold-point inspection approvals, approved tests, as-builts and municipal occupancy/completion document
Estidama Pearl Rating System	DMT/Estidama process	Sustainability design, construction and operation performance	PQP quality-checked submission, invoices/product data, photos/as-builts, test/commissioning records and Pearl Assessor decision/verification
ADOSH-SF Code of Practice 53.1	Abu Dhabi OSH system / ADOSH	Construction OSH management plan, inspections/audits, non-conformance response and corrective-action reporting	Approved/live OSH-CMP, inspection/audit findings, training, competency, incident and corrective-action reports
Abu Dhabi Electricity Wiring Regulations	Department of Energy, Abu Dhabi	Safe electrical installation, contractor obligations, testing and energisation	Licensed-contractor test forms, insulation/earth test records, distributor inspection/acceptance and energisation approval
Abu Dhabi infrastructure services standards and NOC conditions	DMT/Abu Dhabi municipal and infrastructure custodians	Planning/design, implementation, operation and decommissioning interfaces for roads, utilities and other assets	Custodian NOC, approved method and drawings, protection/monitoring, witnessed tests, inspection, survey/as-builts and written release
RTA rail/ROW and Etihad Rail NOC conditions	RTA Dubai and Etihad Rail	Restricted rail zones, roads, crossings, construction sequencing, monitoring, traffic and asset protection	Current activity-specific NOC, layouts/cross-sections, method statement, risk assessment, monitoring, inspection, reinstatement and as-built release
Utility and telecom technical requirements	DEWA, SEWA, EtihadWE, TAQA Distribution, TRANSCO, district-cooling operators, e& du	Network connection, materials, service rooms, ducts, meters, pressure/flushing/electrical/fibre testing, GIS/as-builts	Approved materials/drawings, inspections, calibrated pressure/electrical/fibre/flushing tests, meter/connection/energisation release, as-built/GIS and operator acceptance
RAK Barjeel green-building requirement	Ras Al Khaimah Municipality	RAK green-building compliance required in the Municipality completion process	Barjeel green-building report/documents, inspector review and Municipality completion record
HFZA technical and EHS requirements	Hamriyah Free Zone Authority	Free-zone construction, services, EHS and operation; HFZA guide references current BS or acceptable international standards	Approved calculations/drawings, inspection/test records, EHS evidence, service NOCs, Building Completion Certificate and Operation Permit
Municipality, Civil Defence, port, master-developer and free-zone approved drawings/NOCs	The authority that issued the permit/NOC	Project-specific approved scope, conditions, interfaces, temporary works and final acceptance	Stamped/portal approval, current revision, inspection/reinspection result, authority comment-to-evidence index and applicable completion/handover instrument

15. Authority-Linked Evidence: What to Attach Before Marking an Item Closed

Where a finding originated with an authority, a utility, a master developer, a free zone or the client's own inspection, the PMC's internal verification is necessary but not sufficient. The table below sets out the evidence package expected for the most common authority-linked findings.

Table 15.1 - Authority-linked evidence packages

Authority-linked finding	Who must accept closure	Evidence package to assemble	Common evidence trap
Municipal inspection comment on a building element	The municipality (or the DDA, Trakhees or free zone authority with jurisdiction)	Corrected works; approved revision of the drawing where the correction changed it; re-inspection request and result; approved as-built; the completion certificate at project level	Submitting photographs and the contractor's statement without a re-inspection result or an approved revision
Civil Defence fire system comment	The emirate Civil Defence authority	Approved fire drawings at the current revision; listed or approved product evidence; installation records; cause-and-effect and functional test results; pump flow, alarm and pressure test certificates; re-inspection record; civil defence completion or compliance certificate	Treating design approval as operational acceptance, or closing after installation without witnessed testing
Utility hold point on connection or energisation	The utility or distribution company (DEWA, SEWA, EtihadWE, ADDC, AADC, TRANSCO, district cooling operator)	Approved materials and drawings; inspection request and result; calibrated pressure, electrical, insulation, earthing or flushing test records; meter and connection release; accepted as-built and GIS update; clearance or completion certificate	A conditional pass or snag list filed as final closure, with no dated reinspection
Road, traffic or right-of-way condition	The roads and transport authority or municipal roads department	Approved traffic management or excavation drawings; permit and its conditions; inspection during works; reinstatement acceptance; compaction or CCTV test records where applicable; as-built survey; permit close-out	Assuming the building approval covers road works, access, detours or reinstatement
Telecom infrastructure condition	The lead operator (e& or du)	Approved design and material validation; duct and route records; labelling and room condition; end-to-end fibre test results; as-built and ODF records; operator acceptance certificate	Partial testing, or missing labelling and as-built records that prevent operator acceptance
Environmental permit condition	The competent environmental authority (federal or emirate)	Permit or licence and conditions; environmental management plan; waste manifests and chain of custody with transporter and receiver; monitoring and laboratory results; inspection outcome; clearance where the permit provides one	A service provider's manifest or report treated as statutory clearance
Occupational safety authority finding	The OSH authority or the labour ministry, and the client as a matter of assurance	Revised risk assessment and method statement; physical control verified on site; competency, training and equipment inspection records; incident close-out; audit or inspection recheck with the owner's sign-off	Closing a safety finding with a toolbox talk while the unsafe condition remains

Authority-linked finding	Who must accept closure	Evidence package to assemble	Common evidence trap
Sustainability or green building condition	The administering body (Estidama and the DMT in Abu Dhabi; Dubai Municipality for Al Safat; RAK Municipality for Barjeel)	Quality-checked submission by a qualified professional; product and invoice evidence; commissioning records; as-built and photographic evidence; assessor decision or municipality review record	Assuming that a designed rating is achieved without construction-stage evidence
Product conformity condition	MoIAT and ESMA at federal level; the Abu Dhabi Quality and Conformity Council in Abu Dhabi	Valid certificate of conformity for the exact model; accredited laboratory report; batch or serial traceability; approved material submittal; quarantine and disposition record for the rejected batch	An expired or generic supplier certificate that does not identify the installed product or batch
Estate, free zone, port or master developer condition	The issuing estate authority or master developer	Current approval or NOC for the approved scope; inspection and clearance record; conditions closed item by item; operational or estate handover acceptance where applicable	Confusing a trade licence or lease with construction completion, or assuming municipal approval replaces an estate condition
Concealed work not verifiable by inspection	The verifying authority or the PMC with the designer's confirmation, plus the client where specified	Opening up where required, or a documented alternative such as non-destructive testing, targeted demolition, endoscopy, radiographic or ultrasonic testing, with the result accepted by the designer and, where statutory, by the authority	Relying on a photograph taken before concealment where the requirement is a witnessed inspection or test

Three statuses should be used in the authority tracker, and they should never be collapsed into a single closed status:

Table 15.2 - Authority item status model

Status	Meaning	What the client sees	What remains outstanding
Open	The authority comment or condition has not been resolved	Open, with the responsible party, the blocker and the target date	The corrective work, the test, or the submission
Conditionally accepted	The authority has accepted the work subject to conditions, a snag list or an undertaking	Conditionally accepted, with the conditions listed and dated	The listed conditions, each with an owner and a closure date
Reinspection due	Work is complete and a re-inspection has been requested or is scheduled	Reinspection due, with the scheduled date	The authority's inspection and its outcome
Finally accepted	The authority has issued its instrument or confirmed acceptance in writing	Closed, with the instrument referenced and filed	Nothing, other than retention and warranty records

16. Why Authority-Linked Items Stay Open, and the Control That Prevents It

Research across the seven jurisdictions in this article produced a consistent set of causes. They are grouped below with the mitigating control that a PMC can implement on any project.

PMC handover minimum

The final client dossier should include the live authority matrix; all permits, NOCs and their expiry status; authority comment registers; inspection and reinspection records; approved drawings and as-builts; material conformity and laboratory evidence; commissioning records; fire, utility, telecom, road and environmental releases; completion, occupancy and operational certificates; and an item-by-item observation and non-conformance evidence index. That is what makes a PMC's statement of closure auditable across the layered authority structure of the United Arab Emirates.

17. Implementation Roadmap: 30, 60 and 90 Days

The system described in this article can be stood up on a live project within a quarter. The sequence below assumes an existing project with a register, a contractor and a client.

Table 17.1 - Standing the system up

Phase	Objective	Actions	Deliverables	Success measure
Days 1 to 30	Baseline and control	Agree the terminology schedule and classification rules; audit the existing register and merge duplicates; publish the SLAs and the evidence standard; issue the SOR and NCR forms and the numbering convention; brief every inspector and the contractor's quality team; open the register to the client in read-only mode	Approved procedure, published decision aid, revised register, form pack, briefing pack	One register, one numbering scheme, one classification rule applied consistently
Days 31 to 60	Closure engine	Introduce the weekly closure clinic; publish the ageing report; begin joint verification windows; introduce the evidence naming convention; start the closure dossier for every new NCR; agree the authority tracker with the contractor	Weekly clinic minutes, ageing report, first closure dossiers, authority tracker	Closure rate rising; items over 30 days falling
Days 61 to 90	Assurance and proof	Issue the first monthly assurance pack with the KPI dashboard and the signed statement; sample-audit closed items; run a contractor quality-system audit; begin the handover quality dossier structure; agree the defects register and the DLP handover rules with the client	Monthly assurance pack, audit report, handover dossier structure, defects register	Client accepts the assurance format and can verify closure independently

18. Roles and Responsibilities

Table 18.1 - RACI matrix (R responsible, A accountable, C consulted, I informed)

Activity	PMC inspector / discipline engineer	PMC Quality Manager	PMC Resident Engineer	PMC Project Director	Contractor QA/QC	Contractor Project Manager	Client / Employer's Representative
Capture the observation and evidence	R	I	I	I	C	I	I
Classify and triage the finding	R	A	C	I	C	I	I
Issue the SOR	R	C	I	I	I	I	I
Issue the NCR	C	A	R	I	I	I	I
Approve the containment plan	C	C	A	I	R	C	I
Accept the root cause and CAPA	C	A	C	I	R	C	I
Verify rectification and witness tests	R	C	A	I	C	I	C
Sign the closure certificate	C	R	A	I	R	C	C
Maintain the register	C	A	I	I	R	I	I
Escalate overdue items	C	R	A	C	C	C	I
Issue contractual notices	I	C	R	A	I	C	C
Produce the monthly assurance pack	C	R	A	A	C	I	I
Close authority-linked items	R	C	A	I	R	C	I
Handover dossier and open item schedule	C	R	A	A	R	C	C
Defects register after taking-over	R	A	C	I	R	C	C

19. Templates Supplied in the Companion Workbook

The companion Excel workbook contains the following editable sheets. The dashboard sheet holds the project information once, and the forms and registers load that information automatically, so that the same data set is used everywhere and printing a form requires no retyping.

Table 19.1 - Workbook contents

Sheet	Purpose	Key features
0. Dashboard	Project information entered once	Named cells for project, client, PMC, contractor, contract form, jurisdiction, authority set, DLP and contact data; feeds the forms and reports
1. SOR register	Live log of observations	Drop-down status and discipline lists, automatic ageing, overdue flag, escalation flag, closure evidence reference
2. NCR register	Live log of non-conformances	Class, requirement reference, containment, root cause summary, CAPA dates, verification method, closure certificate reference, cost and programme impact
3. Escalation matrix	Decision and escalation rules in one screen	Thresholds, timelines and the instrument to use at each rung
4. Root cause and CAPA	Five-why analysis and action tracking	Five-why chain, contributing factors, corrective and preventive actions with owners, dates and effectiveness verification
5. Closure evidence checklist	What to attach for each category	Category-based checklist covering workmanship, structure, fire, MEP, materials, authority and documentation items
6. Authority matrix	UAE authority reference	Authority, jurisdiction, scope, project stage, link to SOR and NCR, closure evidence, final completion instrument
7. Authority tracker	NOC, inspection and certificate status	Authority, instrument required, date requested, status, expiry, owner and evidence reference
8. KPI dashboard	Assurance metrics with formulas	Counts, closure rates, mean time to close, ageing buckets, repeat rate, conductor charts across the twelve most recent months
9. RACI	Responsibilities	Mirrors Table 18.1 and can be adapted to the project organisation
10. SOR form	Print-ready SOR	Loads project header data from the dashboard
11. NCR form	Print-ready NCR	Loads project header data and provides the response blocks
12. Closure certificate	Print-ready closure record	Loads project header data, lists the verification basis and evidence index
13. Definitions and references	Glossary and source list	Single-page reference for site staff

20. Common Failure Modes and How to Control Them

Table 20.1 - Failure modes and controls

Failure mode	Root cause	Control
Nothing is recorded until a problem becomes serious	Fear of paperwork, or a culture of informal correction	Make the SOR low effort and low threat; recognise engineers who raise and close early observations
Everything becomes an NCR	No triage rules, or a punitive culture	Publish and enforce the triage table; review NCR volume monthly with the contractor
Registers diverge between the PMC and the contractor	No shared numbering or single system of record	One numbering convention, one register, contractor submissions through the EDMS
Closure without evidence	Pressure to show progress	Closure blocked in the system unless the evidence reference is populated; monthly sample audit of closed items
Non-conformances reopened after taking-over	Verification not matched to the technical category, or authority instruments missing	Apply the closure standards by category; require authority instruments for authority-linked items before completion
Authority findings discovered at the last inspection	No pre-inspection readiness check	PMC pre-inspection against the authority checklist, recorded before requesting the visit
Contractual rights compromised	NCR treated as a notice, or notices not issued on time	Separate quality records from contractual instruments; maintain a notice calendar
Client loses confidence	Open items revealed late or without context	Read access to the register, monthly assurance pack, and honest disclosure of blockers with recovery dates
Preventive actions not implemented	Actions expressed as intentions	Require a verifiable change to a document, checklist, training record or physical control
Repeat non-conformances	Root cause analysis stops at human error	Escalate to systemic classification; audit the contractor's quality management system; require supervision change where needed

21. References and Further Reading

The sources below should be read in their current published version. Regulatory and contractual documents are amended periodically, and the applicable Particular Conditions and permits always take precedence.

Table 21.1 - Sources

Reference	Issuing body or source	Relevance to this article
Conditions of Contract for Construction, Plant and Design-Build, and EPC Turnkey Projects, 1999 and 2017 editions	FIDIC, fidic.org	Clause framework for quality management, inspection, testing, rejection, remedial work, defects and notices

Reference	Issuing body or source	Relevance to this article
UAE Fire and Life Safety Code of Practice	General Command of Civil Defence; administered by emirate civil defence authorities such as the Abu Dhabi Civil Defence Authority (adcda.gov.ae) and Dubai Civil Defence (dcd.gov.ae)	Fire and life safety requirements, approvals, inspection and completion instruments
Dubai Building Code and Dubai Municipality technical requirements	Dubai Municipality, dm.gov.ae	Building permit conditions, inspection regime and Building Completion Certificate
Abu Dhabi International Building Code and DMT requirements	Department of Municipalities and Transport, dmt.gov.ae	Design, construction, inspection and completion requirements in Abu Dhabi
Estidama Pearl Rating System, Pearl Building Rating System manual	Department of Municipalities and Transport, dmt.gov.ae	Sustainability credits requiring construction-stage evidence in Abu Dhabi
Al Safat and the Dubai Green Building System	Dubai Municipality	Green building compliance pathway in Dubai
OSHAD-SF and emirate occupational safety and health regimes	Abu Dhabi OSH authorities and emirate regulators; verify the current governing entity	Safety management, inspections and incident reporting obligations
Product conformity and standards	Ministry of Industry and Advanced Technology and ESMA, moiat.gov.ae; Abu Dhabi Quality and Conformity Council, adqcc.ae	Conformity of regulated products and materials, laboratories and certification
Environmental protection requirements	Ministry of Climate Change and Environment, moccae.gov.ae; Environment Agency Abu Dhabi, ead.gov.ae	Environmental permits, monitoring and clearance evidence
Utility and telecom NOC requirements	DEWA (dewa.gov.ae), SEWA, EtihadWE, ADDC, AADC, TRANSCO, e& and du	Connection, clearance and infrastructure protection evidence needed to complete and hand over
Free zone and developer construction regimes	Trakhees and the Ports, Customs and Free Zone Corporation; Dubai Development Authority; JAFZA; DMCC; DAFZA; Dubai South; KEZAD; Hamriyah Free Zone; SAIF Zone; RAKEZ	Free zone permits, inspections and completion certificates

Verification note

Authority names, portals and service names change, and requirements differ by project, free zone and asset type. Before relying on any authority requirement in a formal submission, confirm it with the authority's current published service guide or with the authority representative assigned to the project.

Appendix A - Site Observation Report (SOR) Form Specification

Table A.1 - SOR form fields

Block	Fields
Header	Project name and number; contract; contractor; PMC; location or package; SOR number; date and time of observation; raised by

Block	Fields
Observation	Discipline; exact location with grid, level or room reference; drawing number and revision; description of the observation; requirement reference; risk if not corrected
Evidence	Photograph reference and number; measurement or reading where applicable; sketch or marked-up plan reference
Action	Required action; responsible party; due date; priority
Closure	Closure photograph reference; closure description; closed by; date; inspector confirmation; status (open, closed, overdue, converted to NCR); converted NCR number where applicable
Approval	Signature of the raising inspector; countersignature of the discipline lead where required

Appendix B - Non-Conformance Report (NCR) Form Specification

Table B.1 - NCR form fields

Block	Fields
Part 1 - Raised by the PMC	Project and contract; NCR number; date raised; raised by; reviewed by; class; discipline; location and drawing reference; description of the non-conformance; requirement breached with exact clause and revision; evidence attached; extent and quantity; containment required; effect on safety, structure, statutory approval, programme and cost; response required by; attached hold or instruction reference
Part 2 - Contractor's response	Acknowledged by and date; containment action taken and evidence; root cause analysis; corrective action with owner and date; preventive action with owner and date; proposed verification method; revised programme where relevant; signatures
Part 3 - PMC verification	Verification method and acceptance criteria; verification date; result; evidence references; verifier name and position; witnesses; outstanding items
Part 4 - Closure	Closure statement; preventive action verified; residual conditions; closure date; contractor signature; PMC verifier signature; PMC Quality Manager signature; client representative signature where required; evidence index
Part 5 - Commercial and programme record	Cost treatment; back-charge reference; programme impact; claim reference; instruction or notice reference

Appendix C - NCR Closure Certificate Template

Table C.1 - Closure certificate wording structure

Element	Text or field
Title	Non-Conformance Closure Certificate
Reference block	Project, contract, NCR number, NCR title, class, date raised, date of this certificate
Statement	"The non-conformance described above has been addressed in accordance with the approved corrective action. The works have been re-inspected or re-tested against the stated acceptance criteria and are confirmed to comply with the contract requirements referred to in the non-conformance report. The preventive action recorded has been implemented and verified. This non-conformance is closed, subject to any residual conditions listed below."
Verification basis	Reference to the re-inspection or re-test record, acceptance criteria, result, instrument and calibration reference, witness details
Preventive action verified	Description of the change made and the date it took effect
Residual conditions	Any monitoring, documentation or follow-up action with owner and date, or "None"
Evidence index	Numbered list of evidence references attached to the dossier
Signatures	Contractor QA/QC manager, PMC verifier, PMC Quality Manager, and the client representative where the client raised the item or required witnessing

Appendix D - Evidence Naming Convention and Folder Structure

Table D.1 - Naming convention

Element	Convention	Example
Pattern	[Project]-[Record ID]-[Stage]-[Document type]-[Date]-[Rev].[ext]	PRJ1-NCR-MEP-0037-VER-Inspection-Report-2026-03-14-R0.pdf
Stages	EV evidence of non-compliance; CN containment; RCA root cause; COR corrective action; PRE preventive action; VER verification; AUTH authority instrument; CLO closure	PRJ1-NCR-MEP-0037-RCA-Five-Why-2026-02-20-R1.xlsx
Folder structure	Registers at the root of the quality folder; one folder per record; subfolders by stage	04-Quality/Registers and 04-Quality/NCR/PRJ1-NCR-MEP-0037/VER
Photographs	Parent record plus sequential number plus date	PRJ1-SOR-ARC-0142-PH-01-2026-02-18.jpg
Rule	No spaces, no personal names, dates in year-month-day order, revisions never overwritten	-

Appendix E - Glossary

Table E.1 - Glossary

Term	Meaning as used in this article
Acceptance criterion	The stated, objective condition that must be met for a corrective action to be accepted as complete
Building Completion Certificate	The municipal instrument confirming that a building has been completed in accordance with the permit and may be handed over or occupied, subject to other approvals
CAPA	Corrective action, addressing the specific non-conforming item, together with preventive action addressing recurrence
Closure certificate	The signed instrument confirming that a non-conformance has been corrected, verified and closed, subject to any residual conditions
Concealment	Work that has been covered, enclosed or removed from view before the required inspection, which is treated as an aggravating factor
Containment	The immediate action taken to stop a non-conformance spreading, to segregate affected work or materials, or to prevent acceptance of non-compliant work
Defects Liability Period	The contractual period after taking-over during which the contractor remains responsible for remedying defects
Hold point	A point in the inspection and test plan at which work must not proceed until the specified inspection or test has been carried out and accepted
ITP	Inspection and Test Plan: the document defining the inspections, tests, acceptance criteria, frequency, responsibility and hold and witness points for an activity
NOC	No Objection Certificate: written clearance from an authority, utility, neighbour or third party, required before a particular activity or approval
Non-conformance	A confirmed failure to comply with an approved requirement, whether in materials, workmanship, method, documentation or process
Observation	A recorded concern, deviation or improvement need that may not yet constitute a confirmed non-conformance
Residual condition	A condition attached to a closure, such as monitoring or documentation to be completed later
Snag or punch list	A list of closeout completion items prepared before handover for works that are otherwise compliant
Taking-over	The point in the contract at which the Employer accepts the works, initiating the defects liability period
Witness point	A point in the inspection and test plan at which the PMC, client or authority is entitled to attend and record the inspection or test

Appendix F - Major NCR Close-Out Field Aid (One Page)

Print on one sheet and keep it in the site office. Use it for every major non-conformance, and for any minor non-conformance involving an authority, a designer or a concealed element.

Table F.1 - Item identification

Reference	Entry	Reference	Entry
Project	[Insert]	NCR number	
Class	Major / Systemic	Date raised	
Location		Requirement breached	
Contractor owner		PMC verifier	
Target closure date		Authority involved	

The seven gates: an item is closed only when all seven pass

Gate	Question to answer	Evidence that passes the gate	Status
G1	Is the requirement and the acceptance criterion fixed and quoted?	Clause / specification section, drawing number and revision, ITP hold point or code reference, plus the objective criterion that defines compliance	Open
G2	Is containment complete and is the affected extent bounded?	Stop / segregation / barricade record with dates and photographs; written boundary of affected work; hold notice reference	Open
G3	Does the root cause reach a controllable system cause?	Five-why chain ending in a system cause, not human error alone; contributing control failures identified	Open
G4	Is the CAPA complete and verifiable?	SMART corrective action; measurable preventive action; named management responsibility; implementation schedule and target dates; monitoring mechanism; evidence of long-term effectiveness	Open
G5	Has the correction been verified by the right party?	Re-inspection or re-test against the stated criteria, calibrated instruments, witness signatures, designer confirmation, third-party test where required	Open
G6	Where an authority or designer was engaged, has that party accepted?	Authority inspection record, NOC, certificate or approved revised drawing. The item cannot be closed on PMC inspection alone	Open
G7	Is the evidence pack complete, indexed and filed, and are the as-builts updated?	Numbered evidence index, revised as-built markup, handover dossier and O&M update, register updated with closure certificate reference	Open

Time box and automatic escalation

Elapsed time	What must have happened	Record to hold	Escalation if not achieved
0 to 24 hours	Containment applied; NCR issued and distributed	Containment record, photographs, hold notice	Raise a written instruction to the contractor's project manager
24 to 48 hours	Written acknowledgement; single named owner appointed	Acknowledgement with owner and contact	Escalate to the contractor's project manager; withhold valuation of the affected item
Day 3	Rectification method statement submitted and approved	Approved method statement and programme	Issue a written instruction to submit within 48 hours
Day 7 (minor) / Day 14 (major)	Root cause, corrective and preventive action submitted and accepted	Five-why analysis, CAPA with owners, schedule and monitoring	Reject and require resubmission; start the escalation ladder
Day 5 after approval	Rectification started with resources on site	Labour and material allocation record	Instruction to proceed; consider the Notice to Correct route
Completion plus 5 days	Re-inspection or re-test carried out and result recorded	Inspection or test record with acceptance criteria	Instruction to re-present; consider third-party verification
Successful verification plus 3 days	Closure certificate signed by the PMC and the contractor	Signed closure certificate and evidence index	Report the overdue closure in the monthly assurance pack
Any item 7 days past due	Written instruction to remedy	Instruction referencing the NCR and the contract clause	Automatic escalation to the PMC Resident Engineer
Any item 14 days past due	Notice to Correct issued in parallel with the quality record	Contractual notice with the obligation, the requirement and the stated time	PMC Project Director and client notified the same day
Any item 28 days past due	Payment and cost action	Withholding note, back-charge statement, delay record	Client escalation and a written recovery plan from the contractor
Safety, structural or statutory item	Immediate escalation, no waiting period	Instruction with the authority or code reference	Notify the client and, where required, the authority

Red flags: escalate immediately if any of these appear

- Photographs offered as the only evidence of closure
- Root cause stated as “carelessness”, “subcontractor error” or “misunderstanding” with no system cause
- Preventive action with no document, checklist, hold point, training record or physical control behind it
- No acceptance criterion recorded when the NCR was issued
- Verification proposed by the party who executed the work, with no independent check
- Authority-linked finding with no authority instrument referenced
- Correction executed before the design or authority consequences were assessed
- Item aged beyond 30 days with no recovery plan or programme impact assessment

Evidence pack checklist: tick only when the document is in the closure dossier

- ☐ NCR with clause, drawing revision, ITP hold point or code reference and the acceptance criterion
- ☐ Photographs with date and location metadata, before and after
- ☐ Containment record and hold notice
- ☐ Method statement, approved, with the revision number
- ☐ Test or inspection record with results and the calibration reference of instruments used
- ☐ Third-party or accredited laboratory report where applicable
- ☐ Material conformity, batch or serial traceability for replaced products
- ☐ Designer or engineer confirmation where the correction affects the permanent works
- ☐ Authority inspection record, NOC, certificate or approved revised drawing
- ☐ Revised as-built markup and handover dossier update

- ☐ Signed closure certificate with the evidence index

The rule that closes arguments

No authority-linked or designer-linked item is closed by PMC inspection alone: it closes when the authority's or designer's own instrument exists. And no major non-conformance is closed on corrective action alone: the preventive action must be verifiable in a document, checklist, hold point, training record or physical control.

Signature	Name	Position	Date
Contractor QA/QC manager			
PMC verifier			
PMC Quality Manager			

Appendix G - Enforcement Guide: Clauses and Notice Timelines When a Major NCR Is Not Closed

This appendix assumes FIDIC-based conditions of contract, which is the prevailing form on UAE projects, with Particular Conditions that amend, delete or renumber clauses. Clause numbers differ between the 1999 and 2017 editions, and the executed contract always prevails. Nothing in this appendix is legal advice: confirm the applicable clause and any notice time bar against the contract before issuing any notice.

G.1 The contract instruments a PMC can enforce

Table G.1 - Contract clauses commonly used to enforce closure of a non-conformance

What the PMC needs to achieve	FIDIC 2017	FIDIC 1999	Trigger	What the notice must contain
Instruct correction of non-compliant or unverified work	3.2 Engineer's instructions	3.3 Instructions of the Engineer	NCR not acknowledged, not addressed, or the response is unacceptable	Reference to the NCR and the clause breached; the required action; the compliance date; the consequence of non-compliance
Reject work, materials or plant and require re-testing	7.5 Defects and Rejection	7.5 Rejection	Confirmed non-compliance with the specification, drawings, code or approved submittal	Description, location and extent; the basis of rejection; removal or making good requirement; re-test or re-inspection requirement
Require removal and making good, with cost on the contractor where attributable	7.6 Remedial Work	7.6 Remedial Work	Non-compliance attributable to the contractor, including design, workmanship, materials or method	Description of the work to be removed or made good; the required method where the PMC specifies it; cost allocation; time allowed
Address a failure of the contractor's quality management and compliance verification system	4.9 Quality management and compliance verification systems	4.9 Quality Assurance	Repeated non-conformances, no functioning self-inspection, material control failure, missed hold points	The specific system failure with evidence, the corrective measures required, and a date for demonstrating compliance
Issue a formal warning that preserves stronger remedies	15.1 Notice to Correct	15.1 Notice to Correct	Failure to comply with any obligation, including the obligation to remedy a non-conformance within the required time	The obligation breached; what is required; the stated reasonable time for compliance, commonly 14 days or as the contract provides
Escalate payment consequences for the affected work	14.6 and the measurement and valuation provisions	14.3 and the measurement and valuation provisions	Non-compliant, unverified or non-conforming work included in a valuation	The item, the NCR reference, the valuation basis, the amount withheld or reduced, and the basis of the valuation
Recover costs incurred by the Employer or a third party	2.5 Employer's Claims	2.5 Employer's Claims	Third-party testing, inspection, opening up, alternative rectification, or access costs caused by the contractor's failure	The amount, the basis of calculation, the supporting records, the NCR and instruction references
Apply delay damages	8.8 Delay Damages	8.7 Delay Damages	Delay to completion caused by the failure to remedy on time	The period, the calculation basis and the contractual reference

What the PMC needs to achieve	FIDIC 2017	FIDIC 1999	Trigger	What the notice must contain
Manage an item carried past taking-over	11 Defects after Taking Over, including failure to remedy	11 Defects Liability	Item unresolved at taking-over, or a defect appearing during the defects liability period	The defect, the required remedy, the time allowed, the cost allocation, and the security or retention consequences
Respond to a contractor claim arising from the correction	20.2 Claims (28-day notice of claim)	20.1 Contractor's Claims (28-day notice)	Contractor seeks cost or time for the corrective works	The PMC's evaluation and response; the contemporaneous records; any time bar applicable to the contractor's notice
Obtain a decision on entitlement	3.7 Agreement or Determination (determination within 42 days)	3.5 Determinations	Disagreement on cost, time or entitlement linked to the non-conformance	A reasoned determination with supporting records; the parties' obligation to give effect to it unless revised
Escalate a live dispute	21 Disputes and Arbitration (dispute avoidance and adjudication board)	20.4 Dispute Adjudication Board	The determination is rejected or the matter is not resolved	Notice of dissatisfaction within the contractual period, commonly 28 days after the determination

The mistake that costs clients their rights

An NCR is a quality record. It is not an Engineer's instruction, not a Notice to Correct and not a notice under the claims or defects provisions. If the PMC relies on the NCR alone, the client's position may be lost to a time bar, and there is no remedy left to enforce. Issue the quality record and the contractual notice separately, and cross-reference them.

G.2 Timelines: the contract's hard bars and the discipline the PMC should impose

FIDIC does not fix most remedial periods; it requires compliance within a stated reasonable time that the Engineer must specify. The PMC should therefore set its own published timelines in the project quality plan and apply them without exception, while respecting the small number of hard contractual time bars below.

Table G.2 - Time bars and fixed periods the PMC must diarise (confirm against the executed contract)

Hard contractual time bar or period	Typical reference	Consequence if the PMC does not run it
Contractor's notice of claim: 28 days from becoming aware	20.2.1 (2017) / 20.1 (1999)	The contractor's claim is time-barred; the PMC must not let the client waive this by conduct
Contemporary records to substantiate a claim	20.2 provisions	A claim later succeeds because the PMC failed to keep contemporaneous records of the failure and its consequences
Engineer's determination: 42 days	3.7.2 (2017) / 3.5 (1999)	The PMC's response to an entitlement dispute is late and the client's position weakens
Notice of dissatisfaction after a determination: 28 days	3.7.5 (2017) / 20.4 (1999)	The determination becomes final and binding on the client
Dispute board decision: 84 days; amicable settlement: 56 days	21 (2017) / 20.4 to 20.5 (1999)	The dispute path is ineffective and the client is exposed to arbitration costs
Notice to Correct: stated reasonable time, commonly 14 days	15.1	The route to stronger remedies, including termination, is lost or delayed

Hard contractual time bar or period	Typical reference	Consequence if the PMC does not run it
Termination following non-compliance with a Notice to Correct	15.2 (2017: 15.2.1 and 15.2.2) / 15.2 (1999)	The client loses the ability to remove a non-performing contractor from the site

Table G.3 - Recommended project timeline discipline for a major non-conformance

Elapsed	PMC action	Instrument	Signed by
Hour 4	Finding recorded and classified; containment instructed	NCR issued with clause and acceptance criterion	PMC verifier
Hour 24	Containment verified; affected extent bounded	Register entry and hold notice	PMC verifier
Hour 48	Acknowledgement and named owner confirmed	Contractor's acknowledgement	Contractor QA/QC manager
Day 3	Rectification method statement submitted	Method statement submittal	Contractor
Day 3 to 5	Method statement approved or returned	PMC review record	PMC Quality Manager
Day 7 to 14	Root cause and CAPA submitted and accepted	CAPA record with schedule and monitoring	Contractor, accepted by PMC
Day 14 to 30	Rectification completed; verification carried out	Inspection or test record	PMC verifier, with client or authority witness where required
Verification plus 3 days	Closure certificate signed	NCR Closure Certificate	PMC and contractor, plus the client where applicable
7 days past due	Written instruction to remedy	Engineer's instruction	PMC Resident Engineer
14 days past due	Notice to Correct, in parallel with the quality record	Contractual notice	PMC Project Director
28 days past due	Payment and cost consequences applied; recovery plan demanded	Withholding note, back-charge, delay record	PMC Project Director, with client notification
Any safety, structural or statutory item	Immediate escalation with no waiting period	Instruction and authority notification	PMC Project Director

G.3 The statutory layer: what each authority can withhold

Where an authority requirement is engaged, the contractor's failure to close the item has a consequence that no contractual notice can replicate: the authority withholds the instrument that the project needs. The PMC should present that consequence to the contractor in writing, because it changes the commercial arithmetic immediately.

Table G.4 - Statutory enforcement levers in the UAE

Authority	Instrument at risk while the item stays open	Practical trigger the PMC should diarise
Dubai Municipality	Building Completion Certificate; site inspections; administrative violations or penalties for works not in accordance with the permit	Book the re-inspection only after the PMC's own pre-inspection passes; any major comment must be closed before the completion application

Authority	Instrument at risk while the item stays open	Practical trigger the PMC should diarise
Dubai Civil Defence (DCD)	Civil Defence completion or fire safety certificate, which is a precondition to the Dubai Municipality Building Completion Certificate	Fire stopping, cause-and-effect testing and pump or alarm testing must be closed and witnessed before ceiling closure and before the DCD inspection
Trakhees / PCFC	Modification Completion Certificate; occupation, use or storage is prohibited before it is issued	Pending comments require re-inspection; never allow occupation or storage while comments remain open
Dubai Development Authority (DDA)	Building Completion Certificate or fit-out completion certificate	Major comments must be closed; structural completion, survey and approved drawings are release criteria
DMT and Abu Dhabi City Municipality	Municipal completion or occupancy documentation under the Abu Dhabi International Building Code	Permitted work must remain accessible until the building official has approved it; concealed work without inspection may be required to be opened up
Abu Dhabi Civil Defence Authority	Certificate of compliance for fire safety and protection equipment	Installation, testing and commissioning records must be complete and witnessed before the inspection is requested
ADQCC and Dubai Central Laboratory	Product conformity acceptance and laboratory test evidence	A non-conforming batch must be quarantined and replaced or retested; a supplier declaration alone is not conformity
Department of Energy, Abu Dhabi	Energisation and connection acceptance under the electricity wiring regulations	Installation must be inspected and tested by a licensed contractor before energisation; test reports must be recorded and submitted
Environment Agency Abu Dhabi and MOCCAE framework	Environmental permit conditions, monitoring obligations and any final clearance	Waste manifests, chain of custody and monitoring records must exist; a service provider's report is not statutory clearance
OSH authorities (OSHAD-SF and emirate OSH regimes)	Corrective action under the OSH management plan and audit findings	The OSH management plan must set non-conformance response timelines and corrective action reporting
MoHRE	Field inspection outcomes, fines and service restrictions	Annual midday break from 15 June to 15 September, 12:30 to 15:00, plus workplace safety inspections
Ministry of Energy and Infrastructure (federal roads)	Completion of Non-Objection Certificate	Issued only after the original NOC conditions and as-built drawings are closed
GCAA	Aviation NOC and obstacle acceptance near aerodromes	Crane and height approvals, marking and lighting tests, and removal records on completion
Utilities: DEWA, SEWA, EtihadWE, ADDC, AADC, TRANSCO	Connection, energisation, completion certificate and as-built approval	Inspection and resubmission after snags is part of the connection journey; energisation is withheld until clearance
District cooling: Empower, Tabreed, Emicool	Connection and commissioning acceptance	Pressure, flushing and commissioning tests must be witnessed and recorded
Telecom: e& and du	Operator completion or acceptance certificate	End-to-end fibre testing, labelling and as-built records are prerequisites to acceptance
Estidama (DMT) and Dubai Al Safat, RAK Barjeel	Sustainability rating decision and green building compliance records	Construction-stage submissions and, for Estidama, possible on-site verification occur after construction completion and before handover

G.4 The three-notice package the PMC should issue in sequence

Table G.5 - Escalation package

Sequence	Instrument	Purpose	Indicative wording structure
1	Instruction to remedy	Creates a written obligation and starts the clock	"We refer to NCR [number] dated [date] concerning [subject] at [location]. The works do not comply with [clause / drawing / code]. You are instructed to [action] by [date]. This instruction is given under [clause]. Failure to comply will result in the issue of a Notice to Correct."
2	Notice to Correct	Preserves the client's stronger remedies, including termination	"You have failed to comply with your obligation to [remedy the non-conformance] as required by [instruction / clause], and have failed to comply within the time stated. You are required to correct this failure within [period] from receipt of this notice, failing which the Employer will exercise its rights under the Contract."
3	Payment, cost and reporting action	Makes the consequence concrete	"The value of [item] is withheld from Interim Payment Certificate [number] pending closure of NCR [number]. The cost of [third-party testing / access / alternative rectification] in the amount of [amount] is recorded as an Employer's claim under [clause]."

G.5 What the PMC must not do

Practice	Why it is wrong	Correct approach
Rely on the NCR as the contractual notice	Time bars run regardless; the client's remedy may be lost	Issue the notice separately under the correct clause and cross-reference the NCR
Accept a verbal promise to correct	Unenforceable and undated; the argument later becomes about what was said	Convert every commitment into a dated written instruction with a stated consequence
Continue certification of the affected work	Payment signals acceptance and weakens the client's position	Withhold or reduce the valuation of the affected item until closure
Let the item age without client visibility	The client learns late and loses confidence; recovery options narrow	Report ageing, overdue items and the recovery plan in the monthly assurance pack
Escalate before the requirement and criterion are unambiguous	An unenforceable notice invites a dispute on the finding itself	Quote the clause, revision and acceptance criterion in the NCR before escalating
Threaten termination casually	Damages the relationship and is rarely in the client's commercial interest	Use the ladder proportionately: instruction, then Notice to Correct, then the contractual remedy the situation justifies

Practice	Why it is wrong	Correct approach
Allow the authority's timetable to become the programme risk	Completion, occupation or energisation is delayed while the argument continues	Diarise every authority gate and treat it as a milestone at risk with its own recovery date