

Clause 6.1.3 requires you to determine your obligations; Clause 9.1.2 requires you to evaluate compliance with them. Most registers do the first and skip the second, which is why assumed compliance with no evaluation record is the most common major nonconformity in an EMS certification audit. Instruments, thresholds and licence conditions are amended and differ by state — confirm the current position before relying on any entry.

REF	OBLIGATION	TYPE (LEGAL / OTHER)	INSTRUMENT OR SOURCE	WHAT IT REQUIRES IN PRACTICE	APPLIES TO (ASPECT REF)	HOW COMPLIANCE IS EVALUATED	FREQUENCY	EVIDENCE RETAINED	OWNER	ISO 14001 CLAUSE	NOTE
CO-01	Environmental protection licence conditions	Legal	State EPA licence (varies by jurisdiction)	Operate within licensed discharge, noise and emission limits; report exceedances	EA-02, EA-08	Licence condition checklist reviewed against monitoring data	Monthly	Monitoring results; exceedance reports; correspondence with the regulator	Environment Coordinator	6.1.3, 9.1.2	Licence conditions differ by state and by site - never copy one site's register to another
CO-02	Matters of national environmental significance	Legal	Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Refer, assess and obtain approval where an action may significantly impact a listed matter	EA-07	Pre-clearance survey and approval-conditions review before works commence	Per project	Survey reports; referral decisions; approval conditions and close-out	Environment Coordinator	6.1.3	Confirm current listed matters before relying on a past assessment
CO-03	Energy and emissions reporting	Legal	National Greenhouse and Energy Reporting Act 2007 (Cth)	Registered corporations report energy production, consumption and emissions annually	EA-04, EA-10	Annual data reconciliation against fuel and electricity records	Annual	Source data; conversion factors; submitted report	Sustainability Manager	6.1.3, 9.1	Confirm current thresholds with the Clean Energy Regulator - they are amended
CO-04	Emission estimation and public reporting	Legal	National Pollutant Inventory	Estimate and report emissions of listed substances above threshold	EA-01, EA-04	Threshold screening against substances handled	Annual	Estimation methods and workings; submitted report	Environment Coordinator	6.1.3	Threshold screening must be redone when materials or volumes change
CO-05	Waste tracking and lawful disposal	Legal	State waste regulations and tracking systems	Track regulated waste from generation to receipt by a licensed facility	EA-05, EA-06	Reconcile consignment records against disposal receipts	Monthly	Waste transport certificates; licensed carrier and facility details; diversion data	Project Manager	6.1.3, 8.1	Requirements and system names differ by state
CO-06	Asbestos removal and clearance	Legal	WHS regulations (asbestos), state-based	Licensed removal, air monitoring, clearance certificate before re-occupation	EA-06	Verification of removalist licence and clearance certificate before re-entry	Per occurrence	Licences; air monitoring results; clearance certificates	HSEQ Manager	6.1.3, 7.2, 8.2	Also a WHS obligation - the EMS records it, it does not replace the WHS system
CO-07	Packaging and product stewardship	Other	Australian Packaging Covenant (APCO) membership	Report against packaging sustainability targets where the organisation is a member	EA-11	Annual report preparation and internal review	Annual	APCO annual report and action plan	Procurement Manager	6.1.3	Voluntary commitment - but once signed it is a compliance obligation
CO-08	Contractual environmental requirements	Other	Head contract and principal's project requirements	Meet client environmental specifications, which frequently exceed the licence	All aspects	Contract review at tender and monthly project reporting	Monthly	Contract environmental schedules; project environmental management plan; client reports	Project Manager	6.1.3	The most commonly forgotten category of obligation in an EMS
CO-09	Climate-related financial disclosure	Legal	AASB S2	Disclose climate-related risks, metrics and targets, subject to assurance	EA-04, EA-10, EA-12	Data reconciliation and assurance readiness review	Annual	Metric methodology; target basis; management review minutes	Sustainability Manager	6.1.3, 9.3	Phasing in by entity group - confirm which reporting period applies
CO-10	Certification scheme obligations	Other	ISO 14001 certification agreement with the certification body	Maintain the EMS, host surveillance audits, notify significant changes	All aspects	Internal audit programme and management review	Annual	Internal audit reports; surveillance audit reports; corrective actions	HSEQ Manager	9.2, 9.3, 10.2	Failing to notify a significant change is a common minor nonconformity

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