

PROCEDURE · P0613-01

Compliance Obligations

INSERT COMPANY
LOGO

A controlled procedure defining how the organization determines, evaluates, records, and maintains the compliance obligations that apply to its environmental aspects under ISO 14001:2026 Clause 6.1.3.

STANDARD
ISO 14001:2026

REVISION
1.0 · April 2026

CLASSIFICATION
Controlled · Internal

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1.4.2 Internal documents

Reference	Title	Role in procedure
M0100-01	EMS Manual	Commits the organization to compliance-obligation management; cross-referenced
P0400-01	Context of the Organization Procedure	Upstream source of regulatory context
P0420-01	Interested Parties Analysis Procedure	Source of adopted interested-party requirements
P0612-01	Environmental Aspects Procedure	Parallel process; supplies aspects requiring obligation mapping
P0614-01	Risks and Opportunities Procedure	Receiving process for escalated Breach items
P0630-01	Change Management Procedure	Trigger for out-of-cycle register review
P0920-01	Internal Audit Procedure	Source of compliance-audit methodology
F0530-03	Roles and Responsibilities Matrix	Job-title mapping for RACI roles
F0612-01	Aspect Identification Register	Cross-reference target (Col O)
F0613-01	Compliance Obligations Register	Primary tool for Clause 6.1.3
F0613-02	Compliance Obligation Assessment Form	Change-event evidence
F0614-01	Risks and Opportunities Register	Escalation target for Breach items
F0912-01	Compliance Evaluation Report	Clause 9.1.2 periodic report

1.5 Terms and Classifications

The following terms carry specific meanings in this procedure. Other terms follow ISO 14001:2026 Clause 3.

Term	Meaning in this procedure
Compliance obligation	A legal requirement or other requirement the organization is required or has chosen to comply with that relates to its environmental aspects. Includes mandatory and voluntary commitments.
Mandatory obligation	An obligation arising from law, regulation, permit, licence, court order, or other legally binding instrument applicable to the organization.
Voluntary commitment	An obligation the organization has chosen to accept without legal compulsion — e.g., an industry code, a customer specification, a sustainability charter.
Applicable	An obligation whose subject matter relates to an aspect the organization has identified in F0612-01, and whose jurisdictional scope includes the organization’s operating locations.
Relevant	An applicable obligation whose practical effect requires the organization to take action (operational, documentary, monitoring, or reporting).
Horizon-scan	A structured review of authoritative sources for new, amended, or imminent obligations.

1.5.1 Obligation status classification (F0613-01 Column M)

Every row in F0613-01 carries a compliance status. Status is assessed at the time of registration and reassessed at each scheduled compliance audit.

Status	Meaning	Action required
Compliant	The organization meets the obligation; evidence is current and verifiable.	Continue current controls; re-verify at scheduled audit.
At Risk	The organization is likely compliant, but evidence is incomplete, out of date, or uncertain.	Verify and close the evidence gap within 30 days.
Breach	The organization does not meet the obligation; enforcement exposure exists.	Immediate Step 5 action plan; Step 6 escalation to F0614-01.
Not Applicable	The obligation does not apply to the organization’s current activities or locations.	Documented reasoning in Col P; re-assess if activities or locations change.

Status	Meaning	Action required
New	The obligation has been recorded, but applicability and compliance have not yet been determined.	Complete F0613-02 assessment within 10 working days.

1.6 Step 1 — Horizon-Scanning (Clause 6.1.3)

1.6.1 Purpose

Horizon-scanning ensures that the organization’s knowledge of applicable obligations remains current between review cycles. An obligation the organization does not know about is still enforceable — compliance ignorance does not limit liability. The scan is structured, documented, and auditable so that a certification body can see evidence of continuous watching, not just annual snapshots.

1.6.2 Sources

The EMS Manager maintains active subscriptions to, or structured monitoring of, the following source categories. Specific named sources are recorded in the **Horizon-Scan Source Register** (F0613-03), which is reviewed annually for completeness and cost-effectiveness.

- **Jurisdictional primary sources** — official gazettes, legislation databases, and regulator websites for every country, state, province, or local jurisdiction in which the organization operates.
- **Legislation-update feed services** — commercial or government feed services providing curated updates on environmental law (e.g., Cedrec, Croner, Legislation Update Service, Environment and Climate Change Canada updates, US EPA rulemaking dockets, EU Official Journal).
- **Trade-body circulars** — sector-specific bulletins from trade associations to which the organization belongs.
- **Regulator consultations** — open consultations on proposed legislation that may become obligations within the annual cycle.
- **Permit-issuer notices** — direct correspondence from permit-issuing bodies regarding variations, reviews, or enforcement priorities.
- **Customer communications** — new or amended customer environmental specifications that become contractually binding.
- **Insurer communications** — underwriter-driven requirements that become binding conditions of insurance cover.

1.6.3 Scan cadence

Source category	Minimum review frequency	Responsibility
Legislation feed services	Weekly	EMS Coordinator
Primary regulator sites	Monthly	EMS Coordinator
Trade-body circulars	On receipt	EMS Manager
Regulator consultations	Monthly	EMS Manager
Permit issuer notices	On receipt	EMS Manager
Customer/insurer communications	On receipt	Departmental Manager (forwards to EMS Manager)

The EMS Coordinator consolidates the weekly and monthly feeds into a dated **Horizon-Scan Log** entry. Each entry records: date, sources reviewed, changes identified, triage decision (proceed to Step 2 / no action / defer with reason), and the EMS Manager’s sign-off. The log is retained as evidence of continuous scanning.

1.6.4 Triage decision

For each identified change, the EMS Manager applies three triage questions in order:

1. **Jurisdictional applicability** — does the obligation apply in any jurisdiction where the organization has operations, assets, employees, customers, or suppliers?

2. **Aspect relevance** — does the obligation address an environmental aspect listed in F0612-01, or an aspect the organization would have if the new obligation were triggered?
3. **Compliance gap likelihood** — could the organization plausibly be non-compliant today if the obligation were in force?

A "yes" to any of the three triggers Step 2 (formal assessment via F0613-02). A "no" to all three permits the item to be logged as "no action" with the rationale recorded in the Horizon-Scan Log.

1.7 Step 2 — Assessment of Each Change (Clause 6.1.3)

1.7.1 Trigger and timing

Step 2 begins when the EMS Manager triages a scan item as requiring formal assessment. The assessment must be completed within ten working days of triage. Urgent items (those with a statutory compliance deadline within 60 days) are flagged for same-week completion.

1.7.2 Assessment form

Each change is assessed on a single copy of the Form F0613-02 Compliance Obligation Assessment Form. The form structures the assessment into four sections:

- **Section A — Identification:** source, citation, effective date, jurisdiction, plain-language summary.
- **Section B — Applicability:** answers to the triage questions, with evidence for each answer (e.g., "Aspect AS-2026-041 is in scope"; "Our facility in Ontario falls within jurisdictional scope").
- **Section C — Gap analysis:** current state of compliance, assessed against the obligation's specific requirements (procedural, operational, monitoring, reporting). Each requirement is scored Compliant / At Risk / Breach / Not Applicable.
- **Section D — Action plan:** for each At Risk or Breach finding, the specific action, owner, target date, and deployment route (operational procedure, training, monitoring, capital expenditure).

1.7.3 Evidence requirements

Each Applicability answer in Section B cites evidence: an aspect ID in F0612-01, a permit reference, an interested-party reference, or a site inventory. Unsupported applicability determinations ("the EMS Manager judged this applicable") are not acceptable evidence under audit.

Gap analysis in Section C references observed controls, not planned controls. A stated intent to implement a control is not evidence that the control exists today.

1.7.4 Worked example — assessing a new fluorinated-gas leak-check requirement

Example — new F-gas regulation amendment introduces quarterly leak-check requirement.

Trigger: Weekly legislation feed surfaces an amendment to the national F-gas regulation that increases the leak-check frequency for systems containing ≥ 5 tonnes CO₂-equivalent from annual to quarterly. Effective date: first day of next fiscal quarter.

Triage: Jurisdiction applies (primary operating country). Aspects relevant (F0612-01 rows AS-2026-012 refrigeration charge, AS-2026-063 air-conditioning charge). Compliance gap likely (current service contract specifies only annual checks). All three triage questions, yes → proceed to F0613-02.

F0613-02 Section A: Source = National Gazette Notice 2026/184; Citation = F-Gas Regulation Amendment 2026 s.12(3); Effective = 2026-07-01; Jurisdiction = All sites.

Section B: Applicable. Aspects AS-2026-012 (refrigeration plant, charge 7.2 tCO₂e) and AS-2026-063 (chiller plant, charge 12.1 tCO₂e) both exceed the 5 tCO₂e threshold.