Compliance Obligations Register

Determine which needs and expectations of interested parties are to become compliance obligations, and determine the legal requirements related to your environmental aspects. These may arise from mandatory requirements; applicable laws and regulations, voluntary commitments such as organizational and industry standards; contractual relationships; principles of good governance and community; and ethical standards.

Ref	Interested Party	Process/Activity	Expectation	Environmental Aspect	Type of Commitment	Compliance or Legal Requirement	Link to Guidance	Compliance Status	Risk Indicator	Risks	Opportunities	Action	Objective	EA Ref	Compliance Score	Owner	Date Identified	Review Due Date	Verification Method	Evidence of Compliance	Target Date	Target Description	Last Reviewed Date	Days to Review (+) / Overdue (–)
CO1	Workers	Chemical Handling	Appropriate equipment, facilities and training for using chemicals	Use of chemicals in manufacturing processes	Regulatory	Control of Substances Hazardous to Health (COSHH) Regulations 2004	https://www.legislation.gov.uk/uksi/2004/3386/contents	Compliant without the need for further action	Low	Carry out risk assessments	Ensure full compliance	Ensure COSHH sheets, risk assessments etc. are available at point of potential incident. Risk assessments of hazardous substances and defined appropriate controls	Carry out a review of all hazardous products to ensure MSDS are available and up-to-date	EA3	1	EMS Manager	15-Jan-2024	29-Sep-2027	Annual COSHH assessment review and MSDS file audit	COSHH register; MSDS file; risk assessment records	30-Jun-2026	Carry out a review of all hazardous products to ensure MSDS are available and up-to-date by Q2 2025		516
CO2	Community	Energy Management	Minimize impacts on climate change	Climate Change Levy is offset by a 0.3% reduction in employer's National Insurance contributions	Voluntary	Climate Change Levy Regulations 2021	https://www.legislation.gov.uk/uksi/2021/675/contents/made	Noncompliant and requires corrective action	Serious	Fine/breach of law	Ensure full compliance	Monitor energy use and take steps to minimize consumption, in order to reduce bills and the financial impact of the Climate Change Levy.		EA6	3	Energy Manager	01-Feb-2024	29-Dec-2026	Monthly energy consumption reports and CCL payment records	CCL declarations; energy consumption data; utility invoices				242
CO3	Workers	Waste Management	Waste storage must be safe, secure, provide no risk to people or the environment	Enforces the Duty of Care requirements for waste handling and storage.	Regulatory	Waste (England & Wales) (Amendment) Regulations 2014	https://www.legislation.gov.uk/uksi/2011/988/contents/made	Compliant but requires on-going management	Moderate	Fine/breach of law	Maintain full compliance	Waste must be transferred to properly licensed waste contractors and a Waste Transfer Note must be provided and kept for minimum 2 years.	Make sure all waste containers used are suitable and secure and in good condition.	EA2	2	EMS Manager	15-Jan-2024	29-Mar-2027	Waste Transfer Notes audit; licensed carrier licence verification	Waste Transfer Notes (2-year archive); licensed contractor list				332
CO4	Workers	Gas Installations	Ensure gas systems on site are safely installed, maintained and safe to use		Regulatory	Gas Safety (Installation and Use) Regulations 1994-2018	https://www.legislation.gov.uk/uksi/1998/2451/contents/made	Breach or impending breach envisaged	Critical	Fine/breach of law	Ensure full compliance	Gas safety engineers service reports and Gas Safe register			4	Facilities Manager	20-Jan-2024	29-Sep-2026	Annual gas safety certificate from registered Gas Safe engineer	Gas Safe certificate; engineer service report; Gas Safe register entry				151
CO5	Workers	First Aid & Welfare	Ensure appropriate equipment, facilities and trained personnel are available to ensure first aid can be given to employees if they are injured or become ill at work		Regulatory	Health and Safety (First Aid) Regulations 1981 ACOP L74	http://www.legislation.gov.uk/uksi/1981/917/regulation/3/made	Compliant but requires on-going management	Moderate	Fine/breach of law	Maintain full compliance	Undertake First Aid training and retain training documentation			2	HR Manager	01-Feb-2024	29-Mar-2027	First aid training certificates and refresher schedule review	Training certificates; trained first aider register; refresher records				332
CO6	Workers	Waste Management	Requirement to notify certain occupational injuries, diseases and dangerous occurrences to the HSE		Regulatory	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013	http://www.legislation.gov.uk/uksi/2013/1471/contents/made	Noncompliant and requires corrective action	Serious	Fine/breach of law	Ensure full compliance	Accident/ Incident reporting, HSE accident forms, accident investigations and accident interviews			3	EMS Manager	15-Jan-2024	29-Dec-2026	RIDDOR reporting log and HSE notification records review	RIDDOR notifications; accident investigation reports; HSE correspondence				242
CO7	Workers	Manual Handling	Ensure task involving manual handling are risk assessed and avoid hazardous handling where practicable and controls are in place to reduce risks		Regulatory	Management of Health and Safety at Work Regulations 1999	https://www.legislation.gov.uk/uksi/1999/3242/contents	*Not applicable to the organization*	N/A	Fine/breach of law	Ensure full compliance	Risk assessments and training				EMS Manager	01-Mar-2024	29-Mar-2028	Manual handling risk assessment register review	Risk assessment records; manual handling training attendance records				698
CO8	Workers	Fire Safety	Ensure fire safety compliance		Regulatory	Regulatory Reform (Fire Safety) Order 2005	http://www.legislation.gov.uk/uksi/2005/1541/contents/made	Compliant but requires on-going management	Moderate	Fine/breach of law	Maintain full compliance	Smoking Policy, availability of fire fighting equipment			2	Facilities Manager	20-Jan-2024	29-Mar-2027	Annual fire risk assessment and equipment maintenance log review	Fire risk assessment report; equipment inspection records; training records				332
CO9	Investors	Waste Management	Increasing investor demand for participation in voluntary schemes	Use of F-gases in air conditioning units	Regulatory	Ozone-Depleting Substances (Qualifications) Regulations 2009	https://www.legislation.gov.uk/uksi/2009/216/contents/made	Compliant without the need for further action	Low	Lack of resources required to participate	Improve rating agency/analyst score therefore opening up more investment	Undertake a cost benefit analysis of participating in scheme	Adopt principles of Regulations SI 2015/310	EA15	1	EMS Manager	01-Feb-2024	29-Sep-2027	F-gas engineer qualification certificates and equipment log audit	F-gas log; engineer qualification records; equipment register	30-Jun-2024	Scheme registration by Q2 2024		516
CO10	Regulators	Energy Management	Hold a valid environmental permit for all activities requiring one, including combustion plant, waste operations, and emissions to air	Combustion of natural gas in boilers generating air emissions above permit thresholds	Regulatory	Environmental Permitting (England and Wales) Regulations 2016	https://www.legislation.gov.uk/uksi/2016/1154/contents/made	Breach or impending breach envisaged	Critical	Permit breach leading to enforcement notice, prosecution, or	Opportunity to renegotiate permit conditions aligned to	Apply for updated environmental permit; engage Environment Agency to discuss compliance timeline; install continuous emission monitoring	Obtain valid Environmental Permit covering all combustion activities by Q3 2025	EA18	4	EMS Manager	15-Jan-2024	29-Sep-2026	Quarterly permit condition compliance check; annual Environment Agency inspection report	Environmental Permit certificate; emission monitoring records; Environment Agency correspondence	30-Sep-2025	Obtain updated Environmental Permit covering all combustion activities by Q3 2025		151
CO11	Workers	Asbestos Management	Identify, manage and prevent exposure to asbestos-containing materials in the workplace	Presence or absence of asbestos-containing materials in building fabric	Regulatory	Control of Asbestos Regulations 2012	https://www.legislation.gov.uk/uksi/2012/632/contents	*Not applicable to the organization*	N/A	N/A — building constructed post-1999; no asbestos-containing	N/A	Maintain up-to-date asbestos refurbishment and demolition survey prior to any building works	N/A — maintain documented confirmation of asbestos-free status			Facilities Manager	01-Mar-2024	29-Mar-2028	Review asbestos management survey on any planned refurbishment or demolition works	Asbestos management survey report confirming absence of ACMs; building construction date records				698
CO12	Workers	Electrical Systems	Ensure all electrical systems are designed, constructed and maintained to prevent danger	Operation of electrical plant, switchgear, distribution boards, and portable appliances	Regulatory	Electricity at Work Regulations 1989 (incorporating Wiring Regulations BS7671 18th Edition)	https://www.legislation.gov.uk/uksi/1989/635/contents	Compliant but requires on-going management	Moderate	Electrical fault causing fire, injury, or business interruption	Robust PPM programme reduces unplanned downtime and	Maintain rolling fixed-wire testing programme (5-year cycle); annual PAT testing for portable appliances; appoint competent electrical engineer	All fixed wiring and portable appliances tested and certified on schedule		2	Facilities Manager	20-Jan-2024	29-Mar-2027	Review fixed-wire test certificates and PAT test log; verify competent person appointment records	Fixed-wire inspection certificates (BS7671); PAT test records; electrical engineer appointment letter				332
CO13	Regulators	Site Services	Store oils above 200 litres in bunded containers that prevent leakage to controlled waters	Storage of fuel oil, hydraulic oil and lubricants in above-ground storage tanks	Regulatory	Control of Pollution (Oil Storage) Regulations 2001	https://www.legislation.gov.uk/uksi/2001/2954/contents	Compliant but requires on-going management	Moderate	Oil spill contaminating drainage system or controlled	Improved secondary containment demonstrates environmental	Inspect all oil storage bunds and tanks quarterly; ensure bund capacity >= 110% of largest tank; maintain spill kits and trained responders	All oil storage facilities meet secondary containment requirements of the Regulations	EA22	2	EMS Manager	01-Feb-2024	29-Mar-2027	Quarterly bund inspection records; tank capacity calculations vs bund capacity	Bund inspection log; tank capacity certificates; spill kit inspection records; trained responder list				332
CO14	Regulators	Transport & Logistics	Ensure all company vehicles are roadworthy, meet emission standards, and are properly maintained	Exhaust emissions and vehicle condition of company fleet and delivery vehicles	Regulatory	Road Vehicles (Construction & Use) Regulations 1986. (Amendments 2012, 2014)	https://www.legislation.gov.uk/uksi/1986/1597/contents/made	Compliant without the need for further action	Low	Vehicle defect leading to accident; emissions non-compliance at	Fleet renewal programme offers opportunity to reduce fleet	Maintain vehicle maintenance schedule; record MOT, service history and daily driver checks; monitor fleet Euro emission standards	All fleet vehicles maintained to manufacturer service schedule with valid MOT		1	Transport Manager	01-Mar-2024	29-Sep-2027	Annual fleet audit reviewing MOT certificates, service records and driver check logs	Fleet maintenance register; MOT certificates; daily driver defect check records; service history				516
CO15	Workers	Facilities Management	Provide a safe, clean, well-ventilated workplace with adequate welfare facilities for all employees	Workplace conditions including temperature, lighting, ventilation, sanitation, and rest facilities	Regulatory	Workplace (Health, Safety and Welfare) Regulations 1992	https://www.legislation.gov.uk/uksi/1992/3004/contents	Compliant without the need for further action	Low	Employee injury or ill-health resulting from inadequate	High-quality workplace supports employee wellbeing,	Carry out annual workplace conditions inspection; ensure adequate ventilation, temperature control, and sanitation; maintain welfare facilities maintenance log	All workplace condition requirements maintained and evidenced through annual inspection		1	Facilities Manager	01-Feb-2024	29-Sep-2027	Annual workplace conditions inspection by Facilities Manager; review of welfare facility maintenance records	Annual workplace inspection report; welfare facility maintenance log; temperature and ventilation records				516
CO16	Workers	Asbestos Management	Manage and control asbestos-containing materials identified in the legacy warehouse building to prevent fibre release	Asbestos ceiling tiles and pipe lagging identified in Warehouse Unit B (pre-1985 construction)	Regulatory	Control of Asbestos Regulations 2012	https://www.legislation.gov.uk/uksi/2012/632/contents	Breach or impending breach envisaged	Critical	Asbestos fibre release causing mesothelioma or lung cancer; prohibition	Full asbestos removal and refurbishment of Warehouse B eliminates long-	Commission licensed asbestos contractor to remove ceiling tiles and pipe lagging under licensed conditions; update asbestos register; notify HSE (ASB5); brief all building users	All identified ACMs in Warehouse Unit B removed or encapsulated under licensed contractor supervision by Q4 2025		4	Facilities Manager	20-Jan-2024	29-Sep-2026	Verify HSE notification (ASB5) submitted; review licensed contractor method statement, risk assessment and air monitoring results	Asbestos register; HSE ASB5 notification; licensed contractor waste consignment note; air monitoring certificates; clearance certificate	31-Dec-2025	All identified ACMs in Warehouse Unit B removed or encapsulated by Q4 2025		151
CO17	Workers	Noise Management	Assess and control employee noise exposure to below the upper exposure action value of 85 dB(A)	Noise generated by production machinery, compressed air systems, and metal fabrication operations	Regulatory	Control of Noise at Work Regulations 2005	https://www.legislation.gov.uk/uksi/2005/1643/contents	Noncompliant and requires corrective action	Serious	Noise-induced hearing loss leading to civil claims; HSE enforcement	Engineering controls to reduce noise at source improve working	Commission noise survey in all production areas; identify areas exceeding 85 dB(A); install engineering controls (acoustic enclosures, anti-vibration mounts); establish mandatory	Reduce average noise exposure in production areas to below 85 dB(A) through engineering controls by Q2 2026		3	EMS Manager	15-Jan-2024	29-Dec-2026	Annual noise survey by competent occupational hygienist; review engineering controls effectiveness; audiometric test results review	Noise survey report; noise risk assessment; audiometric test records; HPE zone signage records; engineering control installation records	30-Jun-2026	Reduce average noise exposure in production areas to below 85 dB(A) through engineering controls by Q2 2026		242
CO18	Regulators	Water Management	Abstract water from borehole only within licensed volumes; prevent surface water contamination from site drainage	Groundwater abstraction from on-site borehole; surface water discharge from site drainage to local watercourse	Regulatory	Environmental Permitting (England and Wales) Regulations 2016	https://www.legislation.gov.uk/uksi/2016/1154/contents/made	Compliant but requires on-going management	Moderate	Abstraction in excess of licence volume; discharge of contaminated	Water recycling programme reduces abstraction volumes and	Monitor borehole abstraction volumes monthly against licence limit; inspect and maintain surface water drainage interceptors quarterly; maintain drainage records	Borehole abstraction to remain within licence volume; no pollution events to controlled waters	EA8	2	EMS Manager	01-Feb-2024	29-Mar-2027	Monthly abstraction meter readings vs licence limit; quarterly drainage inspection and interceptor servicing records	Abstraction licence; monthly meter reading log; drainage inspection records; interceptor service certificates; EA Abstraction Return				332
CO19	Regulators	Waste Management	Classify, segregate, store, and dispose of hazardous waste correctly using licensed carriers and consignment notes	Generation of hazardous waste streams including waste oils, solvent rags, fluorescent tubes, and contaminated packaging	Regulatory	Hazardous Waste (England & Wales) Regulations 2005. (amendment 2009)	https://www.legislation.gov.uk/uksi/2009/507/contents	Compliant but requires on-going management	Moderate	Unlicensed hazardous waste disposal; consignment note breach;	Waste minimisation programme reduces hazardous	Maintain hazardous waste consignment note archive (3 years); verify carrier licence before each collection; complete annual hazardous waste return to Environment Agency; label	All hazardous waste disposed of through licensed carriers with complete consignment note trail	EA2	2	EMS Manager	01-Feb-2024	29-Mar-2027	Annual review of consignment note archive; carrier licence verification at each collection; annual EA hazardous waste return submission confirmation	Hazardous waste consignment notes (3-year archive); licensed carrier certificates; EA annual return acknowledgement; waste segregation records				332
CO20	Community	Site Services	Prevent statutory nuisance from dust, odour, smoke, and litter arising from site operations	Fugitive dust from material handling and external storage areas; potential odour from waste skips	Regulatory	Environmental Protection Act 1990	https://www.legislation.gov.uk/ukpga/1990/43/contents	Compliant without the need for further action	Low	Statutory nuisance abatement notice from local authority;	Proactive dust and odour management strengthens community	Implement dust suppression measures on external roads and storage areas; keep waste skip lids closed; carry out monthly boundary inspection for dust, odour and litter; respond to complaints	Zero upheld statutory nuisance complaints from local authority within review period		1	EMS Manager	01-Mar-2024	29-Sep-2027	Monthly boundary inspection records; review of complaint log and response records; dust and odour monitoring data	Monthly boundary inspection log; complaints register and response records; dust monitoring data; waste contractor skip management				516
CO21	Regulators	Facilities Management	Use only qualified F-gas engineers; maintain leak check records; minimise release of fluorinated gases from refrigeration and HVAC systems	Hydrofluorocarbons (HFCs) contained in refrigeration, air conditioning, and heat pump systems across site	Regulatory	Fluorinated Greenhouse Gases Regulations 2015	https://www.legislation.gov.uk/uksi/2015/310/contents	Compliant but requires on-going management	Moderate	Unrecorded F-gas leak contributing to greenhouse gas emissions;	Transition to lower GWP refrigerants reduces future F-gas	Maintain F-gas equipment log for all systems containing >= 5 tonnes CO2 equivalent; carry out scheduled leak checks by certified F-gas engineers; record all additions, removals and leak	All F-gas systems maintained with complete log records and leak check history; zero unrecorded leak events	EA15	2	Facilities Manager	01-Feb-2024	29-Mar-2027	Annual review of F-gas equipment log; leak check certificates; engineer qualification verification; EA annual F-gas report submission	F-gas equipment log; leak check certificates; engineer qualification certificates (City & Guilds 2079); EA F-gas annual report acknowledgement				332

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Ref	Interested Party	Process/Activity	Expectation	Environmental Aspect	Type of Commitment	Compliance or Legal Requirement	Link to Guidance	Compliance Status	Risk Indicator	Risks	Opportunities	Action	Objective	EA Ref	Compliance Score	Owner	Date Identified	Review Due Date	Verification Method	Evidence of Compliance	Target Date	Target Description	Last Reviewed Date	Days to Review (+) / Overdue (−)
CO22	Workers	EHS Management	Ensure the health, safety and welfare of all employees and non-employees affected by work activities; maintain an effective health and safety management system	All site operations and activities that could harm employees, contractors, or visitors	Regulatory	Health and Safety at Work etc. Act 1974	https://www.legislation.gov.uk/ukpga/1974/37/contents	Compliant but requires on-going management	Moderate	Serious injury or fatality; prohibition or improvement notice;	Strong safety culture reduces lost-time incidents and employer	Maintain ISO 45001-aligned safety management system; conduct annual internal H&S audit; complete and review risk assessments for all significant hazards; deliver annual H&S	Zero prohibition notices; lost-time incident rate maintained below industry benchmark		2	EMS Manager	15-Jan-2024	29-Mar-2027	Annual internal H&S audit; monthly safety committee meeting minutes; lost-time incident rate monitoring; risk assessment review records	Annual H&S audit report; safety committee meeting minutes; risk assessment register; training records; incident register				332
CO23	Regulators	Energy Management	Conduct ESOS energy audit covering at least 90% of total energy consumption every 4 years; notify Environment Agency of compliance	Total energy consumption across buildings, transport, and industrial processes	Regulatory	Energy Savings Opportunity Scheme Regulations 2014	https://www.legislation.gov.uk/uksi/2014/1643/contents	Noncompliant and requires corrective action	Serious	Civil penalty of up to £50,000 for non-compliance; publication on	ESOS audit identifies significant energy and cost reduction	Appoint Lead Energy Assessor (LEA) with valid ESOS qualification; commission Phase 3 ESOS audit covering buildings, industrial processes, and transport; notify Environment	ESOS Phase 3 audit completed and notification submitted to Environment Agency by 5 December 2026	EA6	3	Energy Manager	01-Mar-2024	29-Dec-2026	Review LEA appointment letter and qualifications; audit completion certificate; EA notification acknowledgement	LEA appointment confirmation; ESOS audit report; energy consumption data; EA compliance notification confirmation letter	05-Dec-2026	ESOS Phase 3 audit completed and notification submitted to Environment Agency by 5 December 2026		242
CO24	Regulators	Supply Chain	Ensure all packaging placed on the market meets essential requirements for weight, volume, and recyclability; meet producer responsibility obligations for packaging waste	Plastic, cardboard, and metal packaging used in product despatch and raw material delivery	Regulatory	Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024	https://www.legislation.gov.uk/uksi/2024/1114/contents/made	Compliant without the need for further action	Low	Enforcement action from trading standards; packaging	Packaging reduction programme cuts material costs and	Register as producer with Environment Agency (or approved compliance scheme) under the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations	All packaging obligations discharged through approved compliance scheme; annual data return submitted on time		1	Operations Manager	01-Mar-2024	29-Sep-2027	Annual compliance scheme membership confirmation; packaging data return submission records; base fee payment receipts; compliance scheme membership certificate;	EPR registration confirmation; packaging data return submission records; base fee payment receipts; compliance scheme membership certificate;				516
CO25	Investors	Energy Management	Report UK energy use, greenhouse gas emissions, and energy efficiency measures in annual Directors' Report in accordance with SECR requirements	Electricity, gas, and transport fuel consumption generating Scope 1 and Scope 2 greenhouse gas emissions	Regulatory	Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2018 — Streamlined Energy and Carbon Reporting (SECR)	https://www.legislation.gov.uk/uksi/2018/860/contents	Compliant but requires on-going management	Moderate	Companies House filing omission; investor confidence	Robust SECR reporting provides validated GHG data for ESG	Collect and verify Scope 1 and 2 energy and emissions data quarterly; appoint qualified energy consultant to prepare SECR disclosure; include intensity ratio (tCO2e per £1m turnover) in Directors'	SECR disclosure included in annual Directors' Report with verified Scope 1 and Scope 2 data and intensity ratio	EA6	2	Energy Manager	01-Feb-2024	29-Mar-2027	Annual review of Directors' Report SECR disclosure; energy and emissions data verification; intensity ratio calculation check	Directors' Report containing SECR disclosure; energy and carbon data workbook; utility invoices; Companies House filing confirmation				332
CO26	Workers	EHS Management	Take reasonable steps to prevent sexual harassment of employees in the workplace, including harassment by third parties	Workplace culture, contractor and visitor interactions, and lone working situations creating risk of harassment	Regulatory	Worker Protection (Amendment of Equality Act 2010) Act 2023	https://www.legislation.gov.uk/ukpga/2023/51/contents	Compliant but requires on-going management	Moderate	Employment tribunal claims; reputational damage; EHRC enforcement	Proactive culture of respect reduces staff turnover and	Carry out sexual harassment risk assessment covering all work settings; update anti-harassment policy to reflect the new proactive duty; deliver training to all staff and managers;	Zero upheld sexual harassment complaints; completion of risk assessment and staff training by Q3 2025		2	HR Manager	26-Oct-2024	29-Mar-2027	Annual review of harassment risk assessment; training attendance records; incident log review	Harassment risk assessment; anti-harassment policy (signed off by Board); training completion records; incident register	30-Sep-2025	Sexual harassment risk assessment and manager training completed by Q3 2025		332
CO27	Community	Facilities Management	Implement security measures and emergency planning appropriate to the premises tier under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law)	Premises capacity and public footfall determining tier obligations under Martyn's Law; events and visitor numbers	Regulatory	Terrorism (Protection of Premises) Act 2025 (Martyn's Law)	https://www.legislation.gov.uk/ukpga/2025/3/contents	Compliant but requires on-going management	Moderate	Regulatory non-compliance; enforcement notice; harm to public if	Robust emergency planning improves staff and visitor	Determine premises tier (Standard: 200–799 persons; Enhanced: 800+ persons) based on maximum capacity; register premises with the Security Industry Authority (SIA) once	Premises registered with SIA within statutory deadline; tier-appropriate security procedures documented and staff trained		2	Facilities Manager	01-Apr-2025	29-Mar-2027	SIA registration confirmation; review of security procedures documentation; staff training completion records	SIA registration certificate; premises capacity assessment; security procedures document; staff training records; Senior Responsible Person appointment				332
CO28	Community	Site Management	Protect wildlife and their habitats, obtain licence before affecting	site maintenance activities, tree	Regulatory	Wildlife and Countryside Act 1981 (as amended)		Compliant but	High	Criminal	and biodiversity	annual biodiversity survey by qualified	zero protected species incidents;			Facilities Manager	19-Apr-2026	19-Apr-2027	Ecologist report; staff training	Biodiversity baseline assessment;	46387	Complete annual biodiversity	19-Apr-2026	353
CO29	Community	Site Planning	Achieve biodiversity net gain (BNG) for	new developments or material	Regulatory	Environment Act 2021 (biodiversity net		Partially compliant	Moderate	Planning	On-site BNG	BNG impact assessment part of capital	All applicable developments		2	Facilities Manager	19-Apr-2026	19-Apr-2027	BNG assessments on capital	Project-specific records; BNG	46568	BNG capacity in place for all	19-Apr-2026	353
CO30	Community	Procurement	Avoid sourcing products linked to illegal deforestation	Timber, palm oil, soya, cattle	Regulatory	Environment Act 2021 (Schedule 17 —		Partially compliant	Moderate	Enforcement	Early adoption	Identify forest-risk commodities in	100% forest-risk commodity		2	Procurement Lead	19-Apr-2026	19-Apr-2027	Supply chain mapping;	Due diligence statements;	46386	0% FRC regime compliance;	19-Apr-2026	353
CO31	Regulatory bodies	Site Operations	Protect designated habitats and species from operational impacts	Operations in or near sites of Special Scientific Interest (SSSI)	Regulatory	Conservation of Habitats and Species Regulations 2017 (as amended); Wildlife		Compliant — sites assessed; no	Low	Future site acquisition near	Positive	Protected area screening in site due diligence for acquisitions; early	Zero incidents affecting designated habitats or species		1	EMS Manager	19-Apr-2026	19-Apr-2027	Site assessment records; consultation responses from	Site environmental due diligence; Habitat Regulations	46477	Protected area screening embedded in acquisition process	19-Apr-2026	353

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