

A specimen of the obligation kit

Five rows across the four Parts. The paid kit carries all 23 sections, the full evidence list and the dated plan.

SPECIMEN: FIVE ROWS, NOT THE FULL KIT, NOT YOUR DATA

RECORD DATE	2026-10-19
ACT	Competition and Consumer Amendment (Unfair Trading Practices) Act 2026, C2026A00064. Assented 6 July 2026.
STARTS	1 July 2027. The whole Act commences on that date (section 2).
HELD CONTROLS	Five duty provisions: 28B(1), 48A(2), 48D(2), 48E(1) and 48F(1).
SOURCES	Federal Register of Legislation, authorised version registered 7 July 2026; the held framework record.
LICENCE	One organisation, internal use and its advisers. Not for resale. The Act remains Commonwealth legislation.

What this is. A register of the sections that matter to a consumer business, the evidence a regulator asks for, the first action, and a dated plan to the start date. The requirements are our words, not the Act's. Where the Act leaves a detail to regulations, the register says so. **Not legal advice; does not certify.**

What is inside

- **The register:** 5 rows, each with the section, the part, the requirement in our words, the evidence, the first action, an owner and a due date.
- **The evidence list:** 25 artefacts, by section, in the form a regulator or auditor asks for.
- **The dated plan:** 8 milestones from the read-through to the start date and the first review.

How to use it

Start with the register. Put an owner and a due date on every row that is not already evidenced. Use the evidence list to collect the records and the plan to sequence the work. Re-check the regulations at the planning date; the change watch tells you when the record moves.

Obligation register (specimen: five rows)

REF	SECTION	REQUIREMENT IN OUR WORDS	EVIDENCE A REGULATOR ASKS FOR	OWNER	DUE
CCU-01	28B(1)	Do not use conduct connected with a sale, or an offer of sale, of goods or services to a consumer that meets the unfair trading test. The prohibition is separate from the existing misleading conduct and unconscionable conduct provisions.	A dated review of each consumer decision point, naming the design choice, the alternative and the reason for it.; A record of who approved a pricing, cancellation or consent flow, and what they were told about its effect.; Complaints, chargebacks and contact centre notes about pressure, confusion or blocked exits, with the fix and the date.; Usability or consumer testing that shows the flow can be understood without a prompt or a nudge.; A board or executive minute adopting the unfair conduct standard and the escalation route.		
CCU-06	48A(2)	Display the four required pieces of information for every transaction based charge attached to the supply. The duty is triggered by displaying a base price, and it applies each time the base price is displayed.	Every screen that displays a base price, with the charge information shown on it.; The transaction based charges, the calculation method and the circumstances in which each is payable.; A recording of a full purchase showing the price and the charge information at each step.; The approved wording for each of the four required items, with the date and owner.; The evidence that an offer was made exclusively to a body corporate, if the exception is relied on.		
CCU-11	48D(2)	Give the subscription statement and the section 48D(4) information when the offer is made. The default manner is either comprehensible, audible and unambiguous within a reasonable time before the consumer can agree, or legible, prominent and unambiguous in close proximity to the point of agreement.	The offer page or flow, showing the statement and the six matters before the agree control.; The approved component, its wording and the rule that it must precede the agree control.; The telephone or in-person script that carries the same statement and information.; The date and owner of each wording version, linked to the release.; A test with a consumer who can repeat the key terms after reading the offer.		
CCU-14	48F(1)	Provide at least one exit route, make every route easy to find and straightforward, and keep the steps to what is needed. Add an online route where the contract was entered online or online entry is offered for the same sort of product.	Every route to end the contract, with the entry point, the steps and the time to complete.; A recording of the online exit for a contract entered online or offered online.; The reason each step is necessary to end the contract or protect the subscriber.; The offers, saves or delays shown during exit, and why they do not obstruct.; The time to reach a person and complete the exit by phone, with the date.		
CCU-19	312	Date the contract and each renewal, extension, continuation or variation. The rules reach an earlier contract when one of those events happens after the start date.	Pre-start and post-start contracts, with the entry date for each.; The next renewal, extension, continuation or variation for each pre-start contract.; The date and nature of each variation, with the new terms.; The notice given to the subscriber about the change.; The rule applied to each contract, with the event date and the provision.		

Source for every row: Competition and Consumer Amendment (Unfair Trading Practices) Act 2026, retrieved 2026-10-19. Not legal advice; does not certify.

Evidence list (specimen: first five sections)

SECTION	CATEGORY	RECORD A REGULATOR ASKS FOR	OWNER
28B(1)	Design record	A dated review of each consumer decision point, naming the design choice, the alternative and the reason for it.	
28B(1)	Decision log	A record of who approved a pricing, cancellation or consent flow, and what they were told about its effect.	
28B(1)	Complaint themes	Complaints, chargebacks and contact centre notes about pressure, confusion or blocked exits, with the fix and the date.	
28B(1)	Test results	Usability or consumer testing that shows the flow can be understood without a prompt or a nudge.	
28B(1)	Governance minute	A board or executive minute adopting the unfair conduct standard and the escalation route.	
48A(2)	Price screen inventory	Every screen that displays a base price, with the charge information shown on it.	
48A(2)	Fee schedule	The transaction based charges, the calculation method and the circumstances in which each is payable.	
48A(2)	Checkout recording	A recording of a full purchase showing the price and the charge information at each step.	
48A(2)	Copy approval	The approved wording for each of the four required items, with the date and owner.	
48A(2)	Exception file	The evidence that an offer was made exclusively to a body corporate, if the exception is relied on.	
48D(2)	Offer screenshots	The offer page or flow, showing the statement and the six matters before the agree control.	
48D(2)	Disclosure component	The approved component, its wording and the rule that it must precede the agree control.	
48D(2)	Script	The telephone or in-person script that carries the same statement and information.	
48D(2)	Version record	The date and owner of each wording version, linked to the release.	
48D(2)	Comprehension test	A test with a consumer who can repeat the key terms after reading the offer.	
48F(1)	Exit route map	Every route to end the contract, with the entry point, the steps and the time to complete.	
48F(1)	Online route proof	A recording of the online exit for a contract entered online or offered online.	
48F(1)	Step justification	The reason each step is necessary to end the contract or protect the subscriber.	
48F(1)	Retention check	The offers, saves or delays shown during exit, and why they do not obstruct.	
48F(1)	Phone test	The time to reach a person and complete the exit by phone, with the date.	
312	Contract book split	Pre-start and post-start contracts, with the entry date for each.	
312	Event calendar	The next renewal, extension, continuation or variation for each pre-start contract.	
312	Variation register	The date and nature of each variation, with the new terms.	
312	Notice record	The notice given to the subscriber about the change.	
312	Application note	The rule applied to each contract, with the event date and the provision.	

Dated plan

DATE	MILESTONE	WHAT IT MEANS	RECORD TO KEEP	DONE
2026-10-31	Read the record and name an owner	The product, legal-ops and customer compliance leads read the sections that touch their work. One accountable executive owns the remediation and the budget.	The register with an owner and a due date on every row.	
2026-12-31	Inventory the journeys, the fees and the contracts	Map the consumer decision points, every checkout amount and every recurring, fixed-term, free-trial or introductory-price contract. Record the customer status.	The journey map, the fee classification and the contract inventory.	
2027-02-28	Change the disclosure, the checkout and the exit	Put the subscription statement and the six matters beside the agree control. Show the four charge items beside every base price. Put the exit in the account area and remove steps that are not needed.	Screenshots, a purchase recording and an exit recording.	
2027-04-30	Test the flows and train the team	Test the two-limb assessment, the disclosure comprehension, the price block on a phone and the exit while signed out. Train product, marketing and customer service.	The test results and the training record.	
2027-06-15	Freeze and run the pre-start audit	Freeze the relevant flows. Audit the evidence for every MUST task. Check the telephone and in-store scripts and the accessibility of the price block.	The pre-start audit report and the open item list.	
2027-07-01	Start date: monitor and record	The Act commences. Record the conduct date and the contract event date in complaints and incident records. Watch the first complaints and refunds.	The complaint log and the first post-start review note.	
2027-09-30	First post-start review	Review the new flows and the evidence against the first three months of complaints, refunds and exits. Fix what the evidence shows.	A dated review with the fixes and the owner.	
2029-06-30	The two-year review window closes	The statutory review covers the first two years of the subscription amendments. The report is due within six months, and the watch covers the instruments made under the Division.	The review note and the regulation watch log.	

After the start date. Keep the first three months of complaints, refunds and exits, review them, and update the register. The plan is a working document, not a certificate.