



Department
for Environment
Food & Rural Affairs

www.gov.uk/defra

Adapting to Climate Change: Ensuring Progress in Key Sectors

**Summary of responses to the consultation on the
government's proposed approach to the second round of the
Adaptation Reporting Power**

May 2013

© Crown copyright 2013

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk

This document/publication is also available on our website at:

www.gov.uk/defra

Any enquiries regarding this document/publication should be sent to us at:
climate.ready@defra.gsi.gov.uk

Contents

Consultation information and coverage	4
Background	4
The Adaptation Reporting Power.....	5
Responses received: a summary.....	5
Summary of responses for each question	6
Question 1: If you are planning to report, when would be the most appropriate time for your organisation to submit an adaptation report to government?	6
Question 2: How can we implement a voluntary approach most effectively?	6
Question 3: Do you agree that the criteria for identifying eligible authorities are reasonable? Are there others that might be useful?.....	6
Question 4: Are there any other sectors which you believe should be included?	7
Question 5: Are there any authorities that the government proposes to invite to report which you believe should not be included or any authorities which have not been included which you believe should be?	7
Question 6: Given the importance of the telecoms sector, what sorts of organisations should Defra engage as part of the ARP process?	8
Question 7: What role, if any, should joint reporting across sectors play in the second round strategy of the ARP?	8
Question 8: How would you identify authorities to report jointly, for instance on a spatial basis?	8
Question 9: Can joint reporting play a role in addressing interdependency risks?	8
Question 10: What, if any, help, guidance and support might you as a reporting authority want from the Climate Ready Programme?	8
Question 11: Do you agree with the additional situations in which reporting authorities may be asked to report? Are there any others that you can suggest?	9
Q12: Do you agree with the analysis of costs and benefits in the impact assessment and the methodology used? Are there any additions that you would make? Are you aware of any data or evidence that could assist in quantifying any of these costs or benefits?	9
Next Steps	9

Consultation information and coverage

This consultation presented the government's proposed approach to the second round of the Adaptation Reporting Power (ARP), in line with requirements under the Climate Change Act (2008). It invited views from organisations which had previously reported and those who might report in the future.

On 19 December 2012 Defra launched a public consultation on the proposed policy for the second round of reporting. The proposal was that the Secretary of State would not exercise the power to direct organisations to report. Instead, the second round of the ARP would use a voluntary approach. This means that the the Secretary of State would invite a small number of new organisations to report for the first time as well as first round organisations to provide progress updates. The consultation ended on 13 February 2013.

In the consultation we asked specifically for views on the use of a voluntary approach rather than a mandatory one, the most appropriate timescales for authorities to report during the second round and views on which authorities should be invited to report.

Background

The climate is changing and the impacts from it are likely to affect almost everyone in some way during our lifetimes. There have always been natural fluctuations in climate but observational records show that current rates of change are far greater than those experienced in recent history. Such events may occur increasingly often in the future. These extreme weather events are likely to disrupt the economy and without adequate preparation, could cost lives and money. Building the country's resilience to climate change is a challenge that cuts across society.

The government's vision for a climate ready country is:

"A society which makes timely, far-sighted and well-informed decisions to address the threats and opportunities posed by a changing climate."

The Climate Change Act (2008) gives the Secretary of State the power to direct reporting authorities (organisations with functions of a public nature and statutory undertakers) to produce reports detailing:

- the current and future predicted impacts of climate change on their organisation,
- proposals for adapting to climate change,
- an assessment of progress towards implementing the policies and proposals set out in previous reports.

This is known as the Adaptation Reporting Power (ARP).

In 2009, the then Secretary of State laid before Parliament a report on the strategy for exercising this power for the first time, as required by Section 65 of the Climate Change Act. The strategy focused on major infrastructure providers from the energy, transport and water sectors. The first round was completed in March 2012 and the reports produced can be found here:

<http://webarchive.nationalarchives.gov.uk/20130123162956/http://www.defra.gov.uk/environment/climate/sectors/reporting-authorities/reporting-authorities-reports/>

The final strategy for the second round of the ARP will be laid before Parliament alongside the National Adaptation Programme later in 2013.

The Adaptation Reporting Power

The Adaptation Reporting Power was introduced to help ensure that ‘persons or bodies with a function of a public nature’ and ‘statutory undertakers’ (reporting authorities) are taking appropriate action to adapt to the future impacts of climate change. It helps do this both directly, through engaging organisations in reporting, and indirectly, through raising awareness, building capacity in organisations, and making examples of good practice publicly available.

Reporting has many benefits. It enables organisations to examine their risks adequately. This could include risks to their buildings, assets, their staff, their services and operations, their supply lines, their customers, or their regulatory functions. Reporting helps organisations to become more resilient to climate change impacts and it helps them make more cost effective and timely decisions about how and when to adapt.

There is considerable public benefit to ensuring that key organisations prepare effectively for climate change and report publicly on their work. This allows government and stakeholders to identify barriers to adaptation and to assess the degree to which the country’s public services are preparing for climate change. The public nature of the reports helps organisations to continue engagement with their customers on the likely impacts of climate change and how these are to be addressed.

The government will use the information from the reports to feed into the next national assessment of risks from climate change being undertaken under Section 56 of the Climate Change Act (2008). An assessment of the reports will allow a greater understanding of the risks, any gaps in information and identify priority areas for work in the future. As part of an information cycle, the risk assessment will also feed into decisions on the identification of future reporting authorities. The next national risk assessment of climate change is due to be published no later than 2017.

Responses received: a summary

A total of 60 formal responses to the consultation were submitted. Defra wrote to existing reporting authorities, those that the Secretary of State intends to invite to report during the

second round and other interested parties including organisations that have been working with government on the development of the National Adaptation Programme. The consultation was open to anyone to submit a response.

In general the responses submitted endorsed the proposed approach to the second round strategy for the Adaptation Reporting Power. There were only a few issues on which there were some diverging views. The ideas put forward will be used to develop the approach further during the next round of reporting.

Summary of responses for each question

Consultees were asked for their views on 12 specific questions relating to development of the second round strategy. A summary of responses to each individual question is shown below.

Question 1: If you are planning to report, when would be the most appropriate time for your organisation to submit an adaptation report to government?

Individual organisations indicated timescales over which they propose to report. The timing of reporting is in many cases driven by wider priorities in a particular sector such as price review processes in both the electricity and water industries. Both the new and first round reporting organisations will report at various times between the end of 2013 and 2016.

Question 2: How can we implement a voluntary approach most effectively?

The majority of consultees supported the voluntary approach. There were a few respondents that raised concerns that this could potentially lead to a reduction in the number of authorities reporting due to the work being deprioritised as a result of the lack of statutory requirement. This will always be a risk with any voluntary approach.

Many of the new reporting authorities considered that they would find guidance and templates useful.

Question 3: Do you agree that the criteria for identifying eligible authorities are reasonable? Are there others that might be useful?

Respondents agreed that the criteria for identifying eligible authorities are reasonable. It was suggested by a few that it would be useful for 'umbrella' organisations to report on behalf of smaller organisations in order to reduce the burden on them.

There are also a number of ‘umbrella’ organisations that have agreed to take responsibility for future reporting, for example Energy UK will be responding on behalf of all electricity generators.

Question 4: Are there any other sectors which you believe should be included?

Overall, respondents were content that the proposed list of reporting authorities was comprehensive. Additional sectors that were suggested should report include:

- The food sector i.e. major supermarkets
- Telecommunications sector

Government is currently working with organisations in these sectors through the National Adaptation Programme.

Question 5: Are there any authorities that the government proposes to invite to report which you believe should not be included or any authorities which have not been included which you believe should be?

Generally, respondents were content that the list of proposed reporting authorities was comprehensive and did not consider that there were any authorities that should not be included. Suggestions for additional reporting authorities included:

- Ambulance Trusts
- the Emergency Planning Society
- Lead Local Flood Authorities
- Council of Mortgage Lenders
- Police Authorities

Government will extend engagement with these organisations throughout the lifetime of the National Adaptation Programme.

The consultation also proposed that local councils should not be invited to report, as a specific framework for managing future climate risk has been established through the Climate Local initiative. Formal reporting through the ARP process could lead to duplication for local councils.

Question 6: Given the importance of the telecoms sector, what sorts of organisations should Defra engage as part of the ARP process?

Consultees considered that it would be beneficial to include the telecommunications sector in the ARP process. We are currently working on this with the Department for Business Innovation and Skills (BIS) and the industry regulator (OFCOM). BT has already agreed to produce a report.

Question 7: What role, if any, should joint reporting across sectors play in the second round strategy of the ARP?

There was muted support for the idea of joint reporting between organisations. Respondents generally considered that it could potentially be duplicative and burdensome.

Question 8: How would you identify authorities to report jointly, for instance on a spatial basis?

Again, this was considered potentially duplicative and burdensome. It was suggested by a few that organisations carrying out the same function in different geographic areas might produce a single report through one reporting organisation. However there was limited support for this.

Question 9: Can joint reporting play a role in addressing interdependency risks?

It was recognised that there may be certain specific cases in which joint reporting might be helpful in addressing interdependency risks. However, on the whole, consultees felt that there are existing forums in place that help address these interdependencies (e.g. the Infrastructure Operators Adaptation Forum, which is managed by the Environment Agency Climate Ready support service).

Question 10: What, if any, help, guidance and support might you as a reporting authority want from the Climate Ready Programme?

Consultees suggested that the Environment Agency's Climate Ready support service could assist reporting authorities by providing clear and accurate climate change data and tools as well as reporting templates. It has been suggested that further information in specific areas such as wind patterns and a review of any updates to the evidence base would be helpful.

Government is currently working with the Environment Agency to consider what help the Climate Ready support service could offer to reporting authorities in both the practical aspects of producing an adaptation report and understanding the benefits of assessing the impact of future climate change on their organisation and its functions.

Question 11: Do you agree with the additional situations in which reporting authorities may be asked to report? Are there any others that you can suggest?

Consultees were content with the proposed approach and no alternatives were suggested.

Q12: Do you agree with the analysis of costs and benefits in the impact assessment and the methodology used? Are there any additions that you would make? Are you aware of any data or evidence that could assist in quantifying any of these costs or benefits?

There were some reporting authorities that considered that the impact assessment had underestimated the costs of reporting. Defra has therefore revised the impact assessment in response to these comments. The impact assessment will be published when the report on the second round strategy is laid before Parliament.

Next Steps

The responses submitted have been considered and where possible taken into account in the development of the Report to Parliament which will be published later in 2013. The ideas put forward will influence the implementation of the Adaptation Reporting Power over the period 2013-2016.