



Consultation on Climate Change Reporting by Specified Public Bodies - Developing New Regulations

Response Template

March 2023

First, please tell us ‘About You’, to help us analyse the responses

A. (Optional) What is your name?

B. (Optional) What is your email address?

C. Are you representing an organisation, or are these your personal views?

- I am representing an organisation.
 I am providing my personal views.

If you are representing an organisation, please tell us the name of that organisation.

D. What area do the functions of your organisation fall under?

Please select one description, which most closely fits the **primary functions** of your organisation.

- Local Council
 North South Implementation Body
 Agriculture / Forestry / Fishing
 Arts / Culture / Sport
 Business / Finance
 Charity / NGO (environmental)
 Charity / NGO (other)
 Education
 Energy
 Health / Emergency Services / Social Care

- Industrial Processes / Manufacturing
- Regulator / Auditor
- Residential / Housing / Built Environment
- Transport / Infrastructure
- Waste Management / Recycling
- Other

If you selected 'Other' - please provide a brief description of your organisation's primary function.

E. What size is your organisation?

We have provided a choice of options below, for you to describe the size of your organisation: by number of staff, by annual budget, and/or described in your own words.

Optional: Your organisation's average number of Full-Time Equivalent (FTE) staff, over the financial year ending March 2022.

- 1 - 9 FTE staff
- 10 - 49 FTE staff
- 50 - 249 FTE staff
- 250 - 499 FTE staff
- 500 or more FTE staff

Optional: Your organisation's approximate annual budget for the financial year ending March 2022.

- Less than £1 million
- Between £1 million and less than £3 million
- Between £3 million and less than £5 million
- Between £5 million and less than £10 million
- Between £10 million and £25 million
- More than £25 million

Optional: Please enter any other metric(s) to describe the size of your organisation, e.g. square footage of estate/premises, fleet size etc.

F. Does your organisation currently report on climate change?

Yes

No

If yes, please tell us the name of the reporting regime/scheme, etc.

If yes, is your participation mandatory, voluntary or both.

Please tick all that apply.

Mandatory

Voluntary

Main Consultation Questions

1. How often do you think specified public bodies should provide their adaptation reports?

- Annually
- Every 2 years
- Every 3 years
- Every 4 years
- Every 5 years*
- Other

*(*Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)*

If you chose 'Other' - please tell us HOW OFTEN you think adaptation reporting should be required.

Please tell us your REASONS for your chosen response.

A 5 year reporting cycling carries a high risk in terms of the quality of reporting and action. If meaningful action fails to be delivered, this would not be picked up for five years and the proposed public body reporting system does not set quality standards on climate change action or reporting. Poor quality reporting would not have consequences. Adaptation **strategies** tend to run on 3-5 year cycles, setting the direction of travel and the results of programmes can take longer periods of time to bear fruit, however, adaptation **action** should be continuous, reflecting the amount of change required, making reporting every 2 years valuable to track progress. Public reporting on progress can be a valuable tool for leveraging action with each report holding public bodies to account. A 5 year cycle risks underperformance not being detected in some public bodies.

2. When should specified public bodies be required to provide their first adaptation report?

- By end of January 2025*
- By end of March 2025*
- Later than March 2025
- Other

*(*Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)*

If you chose 'Later than March 2025' or 'Other' - please tell us your SUGGESTED MONTH and YEAR for providing the first adaptation reports.

Voluntary 'dry run' reporting in advance of January 2025 could help public bodies to test their data gathering and reporting systems in a safe space. This could also inform development of the mandatory reporting system, providing an opportunity to flush out inevitable glitches in advance and optimise the quality of data gathered from the outset.

Please tell us your REASONS for your chosen response.

The first *mandatory* adaptation reports should be complete by March 2025 to feed into the fourth UK CCRA.

3. How often do you think specified public bodies should provide their mitigation reports?

- Annually
- Every 2 years*
- Every 3 years*
- Every 4 years*

- Every 5 years
- Other

(*Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)

If you chose 'Other' - please tell us HOW OFTEN you think mitigation reporting should be required.

Please tell us your REASONS for your chosen response.

Mitigation action plans are often short term or can at least be measured in clear stages, reflecting the quarterly energy billing and data collection system. There is therefore a need for more frequent updates on progress towards meeting NI and UK overall emissions reduction targets. It also aligns with the United Framework Convention on Climate Change (UNFCCC) reporting requirements for mitigation.

2 yearly reporting reflects the climate emergency that many NI public bodies have recognised and have committed to addressing. With only a short period of time until NI exceeds its carbon budgets, careful tracking and reporting against progress will help public bodies and NI Government to budget carefully. This can only be achieved however, with the appropriate level of resources and capacity building.

4. When should specified public bodies be required to submit their first mitigation report?

- By end of October 2025
- Later than October 2025
- Earlier than October 2025

If you chose 'Later' or 'Earlier' than October 2025 - please tell us your PREFERRED MONTH and YEAR.

See answer #2 relating to the option for a voluntary dry run.

Please tell us your REASONS for your chosen response.

Mitigation action plans are often short term and can often be measured in clear stages (finance and data collections). Annually may be too frequent causing burden on staff who ultimately should be delivering the plans. This also aligns with the CCC progress reports.

Much of the data that is required for emissions reporting is already gathered and reported by public bodies at least on an annual basis and frequently internally on a quarterly basis. Regular data collection and interrogation can help to establish good quality reporting systems, embedding and normalising them. Increasing the time between emissions generation and reporting increases the difficulty in interpreting and narrating accurately.

Reflecting the Climate Emergency, public bodies should start to report on the emissions associated with their operations in tandem with financial reporting, however, this requires capacity building and resources that many public bodies do not currently have. Additional support to set up and run good quality, effective systems could allow public bodies to report regularly and efficiently whilst allowing staff to focus on the delivery of action on mitigation action.

5. Do you agree that the time period for which emissions data must be provided, by specified public bodies in their mitigation reports, should cover financial years? (i.e. periods from 1st April to 31st March)

Yes

No

If you chose 'No' - please tell us your SUGGESTED ALTERNATIVE.

Please tell us your REASONS for your chosen response.

This helps with data collection in Local Government – however this may not be the case for other organisations such as education bodies (and have some high quality existing climate change reporting systems). It should however most importantly align with GHG data produced from DAERA and BEIS.

It may also be worth aligning with other frameworks such as the Carbon Disclosure Project.

6. If you have any other views on the frequency and timing of reporting, which should be set under the future regulations, please provide them below.

Other views on the FREQUENCY of reporting.

Although it is important to track our paths towards net-zero, and our actions against climate change, it is also important to deliver on these projects. The frequency of the reporting should be often enough to be meaningful and to indicate direction and success of projects, but it should not interfere with organisations delivery of them.

There is a need for user led training support and financial resources to cover staff time.

Other views on the TIMING of reporting.

It is important for all the plans to align in some way and ultimately feed into regional planning. It would also be useful to have a 'dry run' before the reporting year where organisations can report on emissions data before 2025.

7. How do you think the specified public bodies (who will have a duty to report under the regulations) should be identified?

- A criteria-based proportionality approach should be applied
- An exemptions approach should be applied
- A different approach should be applied

If you chose 'a different approach' - please DESCRIBE THE APPROACH which you think should be applied.

Please tell us your REASONS for your chosen response.

This approach could help to identify the major contributors to GHG emissions, and it has been used before in other areas.

8. If a criteria-based proportionality approach is used in the future regulations, which criteria do you think should be included for specifying public bodies?

Please tick all that apply.

- High impact
- High influence
- Large estates
- Large numbers of staff
- Large expenditure
- Auditing or regulatory functions
- Critical/key infrastructure or service provider
- Other

If you chose 'Other' - please describe what you think the criteria should be.

If you have any comments on your chosen response, please provide them below.

9. Do you agree that all of the public bodies listed, in the schedule of the example draft regulations, should be required to report under the future regulations?

The example draft regulations can be viewed in annex 3 of the full-length consultation, or appendix 1 of the abridged version.

- Yes – all
- Yes – but additional bodies should be included
- Partially agree – but some bodies should be removed/not specified
- No – none of these bodies

Please describe any CHANGES which you think should be made to this list.

Voluntary reporting would be useful for other organisations not included in the list which receive public funding, have high emissions or any organisations with public interest. This would help to create a more accurate picture of emissions/activities

This should be a dynamic list whereby organisations are added when necessary. The proportionality approach should also capture the level of influence that organisations have as some may have a relatively small physical estate, staff and annual budget but have significant impacts on other organisations and people. Public bodies funded by government should reflect the NI Government's climate change commitments by demonstrating how their operations align, leading by example. It is essential to recognise, however, that some public bodies are minor players with very limited resources and experience of climate change reporting.

Please provide your REASONS for any changes which you think should be made to the list.

10. Please note - question 10 has been omitted here, as it only seeks information from North/South Implementation Bodies.

11. Do you think that the future regulations should allow flexibility for public bodies to share data and information with each other, to help them comply with their reporting duties?

- Yes
- No
- Don't know

Please tell us your REASONS for your chosen response.

This would help learnings across organisations and share 'good practice' supporting consistency and improve collaboration and coordination in addressing climate change issues.

In terms of sharing best practice, the simple sharing of information could facilitate an informal, low-cost verification system whereby similar public bodies could review each other's submissions to sense check.

12. Do you think that the future regulations should allow flexibility for two or more public bodies to provide a single, joint report?

- Yes
- No
- Don't know

Please tell us your REASONS for your chosen response.

It would be most useful to have the lowest possible level of data collection that could then ultimately be amalgamated up.

Joint reporting would lose granularity of data and decrease its value. The reporting template could be designed to reflect resources and scale of operations and impact. Options could include multi-tiered reporting (similar to the emissions reporting system used in Wales).

13. Which format do you think the future regulations should require reports to be submitted in?

- Online portal
- Electronic form & email
- Other

If you chose 'Other' - please provide details in the box below.

Online portal with live reporting form, with automated updates on BEIS emissions factors as/when available which would avoid delays associated with the factor release dates.

14. Where do you think the future regulations should require reports to be published?

- On the DAERA website only
- On the specified public bodies' websites only
- On both DAERA and the specified public bodies' websites

Questions 15 & 16 relate to the example draft reporting template provided in annex 5 of the full-length consultation, or appendix 2 of the abridged version.

Consultees are reminded that the future regulations must stay within the scope of section 42 of the Act (covered in section 1.6 of the full-length consultation), and any future reporting template would be based on the content of the regulations.

15. Do you think that your organisation could currently provide the level of detail requested in the example draft reporting template?

	Could currently provide all of the detail	Could currently provide some of the detail	Could currently provide none of the detail
Part 1 – Profile of Organisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part 2 -Climate Change Management and Governance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part 3.1 – Climate Change Risk Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 3.2. – Adaptation Action Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 4.1 – Baseline Year and Emissions Statements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 4.2 – Mitigation Action Plan (i.e. Emissions Reduction Plan)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 5 – Validation of Report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer.

More detailed analysis and collection of Scope 1 and 2 emissions may still be required, and we are only at the beginning of our learnings in the collection of Scope 3 data emissions. Climate risk and vulnerability is a current area of work being developed by BCC therefore only some of the detail could be currently provided.

Additional queries –

- if place based climate risk should be being captured (in addition/complementary to organisational)?
- Does aligning a specific action to a specific risk support unintended consequences e.g. if reducing heat risk in buildings and reflective materials are proposed, will this not just add to the urban heat island effect on the street?
- Would like more detail as to how overall risk of a place is being decreased. Also a range of risks can be reduced through one action e.g. increasing access to green space to tackle heat and flooding vulnerability. Need to ensure prioritisation of actions build this in. A focus on outcomes and indicators would support this than monitoring the achievement of actions

16. Are there any questions in the example draft reporting template, which you think should be amended, removed or any further questions to be added?

In the list below, please select all options which reflect your views.

- Amend questions
- Remove questions
- Further questions to be added
- None

If you think that any questions should be AMENDED, please indicate below which questions these would be, and how you think they should be amended.

3.2 question c) – co-benefits for reducing emissions should be listed, as examples to consider, along with potential risks associated to adaptation actions.

Examples should be provided in the accompanying guidance document, not in the reporting template. But in the right place, they will be a great help.

h) For each risk identified under 3.1(b), state if there are any similar risks identified/title under the high-level objectives in:

- the most recent UK Government's Climate Change Risk Assessment (CCRA);
- the most recent Northern Ireland Climate Change Adaptation Programme (NICCAP).

Suggest rewording to require the reporting body to be required to demonstrate how risks align with UK CCRA and NI CCRA and which ones don't (and potential rationale as to why e.g. local level (for a council) will vary with regional risk.

If you think that any questions should be REMOVED, please indicate below which questions these should be.

If you think that any questions should be ADDED, please indicate below which questions these should be.

When reporting it is important to provide options from which to decide, to guarantee consistency. In the reporting template for public bodies in Scotland the adaptation questions are the same as the ones suggested in this consultation. Listing potential scenarios, metrics, benefits and risks can facilitate and speed up the reporting process and make easier the completion of the report also by non-expert that might contribute to redacting the document.

Undertaking a risk assessment is a key step for public bodies to identify and take action to reduce the impacts of climate change, and it requires substantial work of coordination and cross-departmental collaboration. The current template does not allow for sufficient collation of reliable comparable information, in particular on having the same methodologies used by all public bodies for key data and information. While it is good to be flexible and allow public bodies to report a wide range of activity, it is important to learn from experience, with a focus on reporting for a purpose and ensure useful analysis of the reports is relatively straightforward. It is critical that the reporting document is designed to enable simplified, high-quality reporting through use of specific questions, drop down menus and carefully crafted (and road tested) guidance.

Please provide your REASONS for any changes which you think should be made.

17. What type of support do you think may be required to help specified public bodies meet their reporting duties under the future regulations?

(Please tick all that apply)

- Guidance document
- Training for staff

Other

If you chose 'Other' - please describe your SUGGESTED ALTERNATIVE.

This is a new process, and the reporting template should be presented in a user-friendly format to provide accessibility and create a flow of information that is easy to compare and understand.

The reports will be in the public domain, and it is important that they can be easily understood.

Training needs assessment of those likely to have to collate and produce the reports, considering different learning styles, organisation scales and remits, likely to result in some of the following:

Option for voluntary reporting in advance of mandatory date to provide a safe space to test and learn. Opportunity for those running the reporting system and those participating to learn and amend processes.

Training – mixture of online and real life training events for general reporting and specialist topics. Front loaded at the outset of the process to build capacity for existing staff and supplement in future for new staff and changes to the reporting system.

Online tutorial and a 'dry run' of reporting – organisations are closely directed on what is needed and how to collect and record the information

Guidance document – similar to those in Wales and Scotland.

One to one support in early phases – access to skilled support for reporting bodies.

Please tell us your REASONS for your chosen response.

18. Should public bodies be required to validate the information in their reports before they are submitted to DAERA under the future regulations?

For example, a requirement for reports to be signed off by the organisation's senior management, etc.

Yes

No

Don't know

If you chose 'Yes' - please specify WHAT TYPE of validation you think should be required.

A checklist for organisations to go through along with:

Verification – ideally, reports would be independently verified and where resources are available, this should be the case. Where they are not, bodies should be encouraged to use alternatives such as verification by their internal audit team or other accountable and impartial resource or a 'homework checking' approach whereby organisations collaborate to sense check and test each other's reports to optimise accuracy.

Validation – reports should also be signed off by chief executives/ senior elected members etc. as accurate reports on their organisation's climate change position. Support is likely to be required to enable senior staff/members to fully understand what they are endorsing.

Please provide your REASONS or any further comments.

It is important that everyone is using the same methodologies

19. If the future regulations place climate change reporting duties on your organisation, please provide an estimate of what the resource implications might be.

Please enter any description or detail for your estimate in the box below, e.g. costs, staff numbers, time, etc.

Belfast City Council are in a unique position as they currently have the role of a climate commissioner and a small team of staff who work full time on actions within the city's climate plan. However, their time is already stretched to capacity and adding a further element of reporting will add to an ever-increasing workload. Education around the requirements, communication with staff, residents and city stakeholders will be necessary to ensure thorough engagement and successful implantation of this new process

20. If you have any further comments in respect of any of the issues raised in this consultation, please provide them below.

Effective **use** of the information provided is critical. The reporting process should be underpinned with a commitment to use the data effectively with a clear outline of what that process and outputs might look like. Ideally the data gathered would be used to inform policy development and the allocation of funds to priority areas.

21. If you have any other comments on any important issues, which you feel have not been adequately covered in this consultation, please provide them below.

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