

Response ID ANON-84C1-R6R1-B

Submitted to Consultation on Climate Change Reporting by Specified Public Bodies - Developing New Regulations
Submitted on 2023-06-08 16:07:00

About You

A (Optional) What is your name?

Name:
Elaine Crory

B (Optional) What is your email address?

Email address:
elaine.crory@wrda.net

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

I am representing an organisation

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

Women's Resource & Development Agency (WRDA)

About You - Organisations

D Which area do the functions of your organisation fall under?

Charity / NGO (other)

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

E What size is your organisation?

1 - 9 FTE staff

Less than £1 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?

No

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

Not Answered

Questions 1-6 for Organisations: Content of Reports and Reporting Cycles

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

Every 2 years

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.:

Without the requirement for regular monitoring, any issues or concerns run the risk of developing into more serious problems. In addition, a culture of monitoring should be well established and considered to be working well before we consider moving to less regular reporting.

The 5 years referred to here is a choice made by DAERA to reduce monitoring requirements - the very same section of the consultation document quotes the CCC saying "The CCC have said that reporting every 5 years on mitigation should be a minimum. However, they also advised that every 5 years would likely be too infrequent to drive the rapid progress needed to see any difference in cutting emissions, and it would not be enough to build a robust database (for mitigation). It was also their perspective that reporting every year (annual reporting) on mitigation by public bodies would not be necessary."

For all these reasons we are recommending reporting every two years.

We need more than the bare minimum to drive rapid change and we deserve honesty about this in our consultation documents.

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

By end of January 2025*

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

Please tell us your REASONS for your chosen response. :

It aligns with CCC recommendations and it is the soonest option available.

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

Every 2 years*

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.:

We chose the same option as we chose for reporting requirements and for the same reasons; mitigations need to begin in earnest soon and to be monitored robustly. It also aligns with the soonest option recommended by the CCC.

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

By end of October 2025

If you chose 'Later' or 'Earlier' than October 2025 - please specify your PREFERRED MONTH AND YEAR.:

Please tell us your REASONS for your chosen response.:

Again, if public bodies are beginning their reporting in January 2025 as recommended they should be ready to submit their first mitigation report by October 2025. It makes sense that the mitigation report would follow the first report, but by a short time.

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

If you chose 'No' please describe your SUGGESTED ALTERNATIVE.:

Please tell us your REASONS for your chosen response.:

We are relatively indifferent to this question, but a financial year is as good a measure as any other - it is still one year.

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. :

As stated above, we are concerned that there is a bias in this consultation to encourage those who are not careful about checking the full consultation report before replying to opt for more widely spaced reporting requirements, opting for something that prioritises the burdensome-ness of reporting above the urgency of action on these matters.

We have chosen the options that we have chosen (reporting every 2 years, mitigation reporting every two years) because we grasp the absolute urgency of these actions. We also understand the importance of embedding a culture within these public bodies as soon as practically possible; rather than allowing this to become a set of requirements that is seen as an obstacle or a burden, it should be seen as a means of self-regulation and as encouragement to these bodies to take their role and responsibility seriously.

Other views on the TIMING of reporting.:

Questions 7-9 for Organisations: Which Public Bodies Should be Specified in the Regulations?

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 approach should be applied

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

Please provide your REASONS for your chosen response.:

This is the model adapted in Scotland and in the Republic of Ireland and is the model that best holds these institutions to account to meet the standards that others need to meet.

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?

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

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.:

We have based this largely on the approach taken in Scotland and in the Republic, with the addition of "critical/key infrastructure or service provider". This addition is to take account of the different reality in the NI Economy where some public bodies are quite often part of or ALBs to the government, who may not meet the other criteria listed on their own grounds.

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?

Yes – all

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

Please describe 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.

Questions 11-14 for Organisations: Reporting Duties – Further Elements to be Included in the Regulations

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

Please tell us your REASONS for your chosen response.:

Yes - any action that can help organisations meet their requirements should be explored. With that said the thrust of this action must be to assist in meeting the targets to reduce their emissions.

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

Don't know

Please tell us your REASONS for your chosen response.:

This would depend on the public bodies and whether or not it made coherent sense for them to submit a joint report. Provision would have to be made to ensure that their report could be coherently separated by the regulators, so that one body could not "hide" a lack of action behind another's positive action.

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

Online portal

If you selected 'Other' please provide details in the box below. :

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

On both DAERA and the specified public bodies' websites

Questions 15-16 for Organisations: Reporting Template

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

Orgs - Template ability - Part 1 - Profile of Organisation:
Could currently provide all of the detail

Orgs - Template ability - Part 2 - Climate Change Management and Governance:
Could currently provide some of the detail

Orgs - Template ability - Part 3.1 - Climate Change Risk Assessment:
Could currently provide some of the detail

Orgs - Template ability - Part 3.2 - Adaptation Action Plan:
Could currently provide some of the detail

Orgs - Template ability - Part 4.1 - Baseline Year and Emissions Statements:
Could currently provide some of the detail

Orgs - Template ability - Part 4.2 - Mitigation Action Plan (i.e. Emissions Reduction Plan):
Could currently provide some of the detail

Orgs - Template ability - Part 5 - Validation of Report:
Could currently provide some of the detail

Please explain your answer.:

My organisation is a small charity in the Voluntary and Community Sector. We would hold some of the relevant information but could access others with effort if required. Note that this question is clearly intended for organisations that may be required to report and whose administrative structure is considerably more developed and extensive than is WRDAs.

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?

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.:

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 what you think these additional questions should be. :

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

These questions are sufficient. However when reported on the DAERA website and/or the organisations website, an assessment should be made as to whether the body is meeting its required targets, whether it is improving or disimproving from previous assessments, and other relevant data - this information should be available to the public at a glance.

Questions 17-21 for Organisations: General Questions

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

Guidance document, Training for staff

If you chose 'Other', please describe your SUGGESTED ALTERNATIVE.:

Please tell us your REASONS for your chosen response.:

We have suggested both a guidance document and training for staff, and to elaborate we add that training for staff must include not just training on completing reporting and mitigations paperwork but training that captures the spirit of what this monitoring is meant to achieve, as well as ideas as to how their particular organisation can achieve them - and even exceed them.

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

Yes

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

Please provide your REASONS or any further comments.:

Accountability is key, especially while a culture may not exist that encourages compliance and enthusiastic engagement with this kind of monitoring. Sign off by senior management will encourage the reporting to be examined seriously by those who hold ultimate responsibility for the body.

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.:

This is difficult to estimate as a very small charity, but it is likely that it could be absorbed into administrative duties of one person with part of their time devoted to this work / a part time staff member.

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

Please enter any comments in the box below.:

Once again we wish to raise the rather misleading nature of the options presented in some of the earlier questions re frequency of reporting.

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.

Please enter any comments in the box below.: