

## **A consultation on the government's proposed strategy for the third round of the climate change Adaptation Reporting Power**

### **Background to CIWEM**

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent comment on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

### **Do you agree that reporting in the third round should continue to be voluntary?**

We consider that by the third round of reporting, many organisations should be used to the requirement to report on adaptation, and more familiar with working this into their operations. There should therefore be greater expectation for this to be undertaken as a matter of course and we would recommend that reporting should be made mandatory in the third round.

Unfortunately, there are a significant proportion of organisations who under the voluntary approach are not filing reports, for example in the last round only just over half of water companies submitted them. Given the concern over impact on critical infrastructure of extreme weather events in recent years, it is a logical extension of planning for resilience and adaptation to climate change for all organisations which rely on or operate such infrastructure, and which provide essential services to the public should be required to report.

This position is further underpinned by the evidence of fewer organisations reporting under the second round in which the approach was more discretionary, combined with the evaluation findings showing that reporting was important in driving adaptation and mandatory reporting catalysed top level buy-in and support.

We consider that one weakness with a voluntary approach is lack of consistency between reports and we would therefore suggest that some guidance is needed and should be issued to try and improve this. An important component of this should be the accessibility of reports to the public in terms of clear and simple explanation of risks and adaptation measures being put in place.

### **Do you agree with the principles for reporting in the third round?**

We are supportive of the proposals for reporting in the third round. We acknowledge the desire to minimise regulatory burden, but we would expect that the organisations concerned should be effective in identifying and managing risks to their operations and that a great

many (such as utilities companies) are, or should be, collecting extensive data which will inform the reports.

We rely on a sustainable environment to provide us with a range of services. A water company for example, cannot function without sustainable water resources and an environment capable of accepting discharges. Adaptation needs to properly recognise the increasing unsustainability of our environment in the face of climate change and reporting should provide greater awareness of where particular action is required to underpin this sustainable environment. We consider that this is critical to achieving the Government's target to leave the environment in a healthier state than inherited, set out in its recent 25 Year Environment Plan.

**Do you agree that reporting in the third round should build on the second round by agreeing sector or organisational reporting proposals?**

We consider that this would be beneficial on a number of levels, primarily to improve consistency of reporting as well as encouraging sectors to understand best practice in their areas of operation. Therefore, we would support an approach which asked key sectors such as water, energy, local government, to provide a sector-response.

We would like to see more recognition of the complex interaction between different types of infrastructure. Water company drainage networks depend on the capacity of other urban drainage to deal with overflows and vice versa, with urban drainage (e.g. highways) depending on water company sewerage networks to take a proportion (or even all) of urban drainage flows. Infrastructure is critically interdependent – water, power supplies, roads and access routes, telecoms – and all modern services we expect rely on the availability of these services working in conjunction with each other.

We would also like to see companies recognising the potential uncertainties in forecasts and modelling built into the adaptation plans. Some responses are, by their nature, more flexible particularly in combination with others (e.g. it is relatively easy to retrofit more sustainable drainage if the original projections are incorrect).

**Do you agree that the reporting date should be determined by sector, reflecting on regulatory or business pressures within the reporting window of 2019-2021, with a final deadline of 31 December 2021?**

Yes, we agree with this as it will help to minimise any regulatory burden associated with reporting. However, it is important that evidence can be collated in advance of CCRA3 (it was too late in some cases for CCRA2).

**Do you agree that the criteria for identifying eligible organisations are reasonable? Are there other factors that might be useful to consider?**

Yes, we agree with the proposals and we also agree that it would be appropriate for some umbrella organisations to report where appropriate, though this should not be the case for

large companies such as water companies, which are Statutory Undertakers and provide essential services to the public.

**Are there any other sectors which you believe should be included on the list?**

No.

**Are there any organisations that the Government proposes to invite to report which you believe should not be included?**

No.

**Are there any organisations that have not been included which you believe should be?**

We consider that the following should be included:

- Ministry of Defence and the security services
- Other charities with major landholdings / interest could be approached e.g. RSPB, WWT, LWTs
- Large volume house builders
- Local authorities should report via the LGA or similar – their roles are too important not to be reflected
- The Association of Drainage Authorities should report and should be supported to do so one way or another

**Do you agree with the additional situations in which organisations may be asked to report? Would you suggest any others should be included?**

If gaps in evidence (e.g. CCRA3) requires that other organisations report then they should be included.