

Response ID ANON-K8T7-Z6J7-Y

Submitted to Consultation on the Fourth Round of the Climate Adaptation Reporting Power
Submitted on 2023-04-05 14:09:42

Introduction

1 Would you like your response to be confidential? When this consultation ends, we will summarise the responses and place this summary on our website at: <http://www.gov.uk/defra>. This summary will include a list of organisations that responded but not personal names, addresses or other contact details.

No

If you answered Yes to this question and you do not want your response (excluding personal names, addresses or contact details) to be publicly available, please give your reason. :

2 What is your name?

Name:
Ian Moodie

3 What is your email address?

Email:
ian.moodie@ada.org.uk

4 What is the name of your organisation?

Organisation:
ADA (Association of Drainage Authorities)

5 What is the geographical coverage of your organisation? Select all that apply.

North East (England), North West (England), Yorkshire and The Humber, East Midlands (England), West Midlands (England), East of England, London, South East (England), South West (England), Scotland, Wales, Northern Ireland

6 Did you/your organisation submit a report in round 3?

No

7 If no, why not?

Did not have time/resource

List other reasons here. :

8 Would your organisation be interested in reporting in round 4?

Undecided

Round 4 Objectives

9 Do you agree with the objectives and principles for this round of reporting?

Yes

Please give your reasons as necessary.:

ADA broadly supports the objectives and principles as written.

10 Are there any additional objectives or principles you would want to see included?

Are there any additional objectives or principles you would want to see included?:

No

11 Would providing an update on changes since round three of reporting enable your organisation to deliver a report within a shorter time period?

No

If unsure, please explain.:

12 Do you have any further proposals that would help streamline and minimise the reporting burden on your organisation or sector?

Yes

If yes, please provide details.:

ADA supports Defra exploring how the current individual reporting system (IDB1 form) to Defra from each IDB could be enhanced to facilitate collection of the necessary information for ARP reporting.

However, ADA is a very small business, currently employing only five full time equivalent posts. ADA is already fulfilling a number of requests for data and support from Defra in addition to our work for members. ARP reporting from smaller public bodies such as IDBs not only requires the collation of data, analysis and report writing, but ongoing support in order to assist IDBs in gathering data and responding to the request.

ADA would need to source adequate funding support to deliver the ARP report for IDBs. ADA would prefer to focus our limited resources in the fourth reporting period on delivering its commitments within the National FCERM Strategy Action Plan for England to deliver guidance for IDBs and the Environment Agency exploring the potential strategies and techniques available to adapt to climate change and reduce carbon emissions associated with flood risk and water level management in lowland areas dependent upon pumping.

Reporting Requirements

13 Should ARP reporting remain voluntary or be made mandatory in round four?

Yes, it should remain voluntary

Please give your reasons as necessary.:

ADA supports ARP reporting remaining voluntary for smaller organisations and their representative bodies.

14 Should the position be reviewed again ahead of round five?

No

15 What impacts, positive or negative, could mandatory reporting have in your organisation?

What impacts, positive or negative, could mandatory reporting have in your organisation?:

ADA could only support mandatory reporting if it came with financial assistance as this would be a new uncosted burden on our small membership body. ADA already provides unfunded support to Defra in a number of areas related to internal drainage boards.

In ADA's view mandatory reporting could reduce the depth and quality of these reports and encourage reporting authorities to more rigidly stick to any minimum requirements specified and may limit consideration of more sector-specific risks.

16 What else can government do to encourage additional coverage in sectors where gaps have been identified? How should we determine proportionality in these sectors?

What else can government do to encourage additional coverage in sectors where gaps have been identified? How should we determine proportionality in these sectors?:

ADA would welcome support from Defra in delivering guidance to explore the potential strategies and techniques available to reduce carbon emissions associate with flood risk and water level management in lowland areas dependent upon pumping.

Furthermore, ADA sees a need for active support for smaller public bodies such as IDBs being newly brought within the adaptation reporting regime.

There needs to be a recognition that representative bodies require a longer time period to report given that they will be collecting and collating information from their member bodies. Guidance and assistance with this function would be welcome.

Other Reporting Regimes

17 Is your organisation subject to existing or planned UK Sustainability Disclosure Requirements or any other relevant reporting regimes? How far do these go in fulfilling the objectives of ARP in your organisation?

No, we are not subject to existing or planned UK Sustainability Disclosure Requirements or any other relevant reporting regimes

If yes, how far do these go in fulfilling the objectives of ARP in your organisation?:

18 Are there any gaps which remain between the information provided under other reporting requirements and that of ARP?

Yes

If yes, please provide details. :

ADA is not familiar with the requirements of the UK Sustainability Disclosure Requirements and is therefore unable to comment.

No option was provided for undecided and so to avoid giving false confidence ADA's response was yes.

19 Could your TCFD-aligned disclosures effectively replace ARP in round four or beyond?

No

Please give any supporting reasons. :

This would not be relevant for internal drainage boards as ADA is not aware of any IDBs being subject to the UK Sustainability Disclosure Requirements.

Sectoral, Regulatory and Risks Approach

20 Do you support a case-by-case approach to sectoral reporting, balancing the need for proportionality with the need for specific insights into the management of climate risks? Please give any supporting reasons.

Yes

Please give any supporting reasons.:

See answers to preceding questions relating to membership bodies and small organisations.

21 Who should be asked to report in the energy generation, telecommunications and digital sectors?

Who should be asked to report in the energy generation, telecommunications and digital sectors?:

No comment.

22 How can reporting by regulators best reflect their important oversight role?

How can reporting by regulators best reflect their important oversight role?:

Reporting is most effective only where there is a defined follow-up plan for any recommendations made or actions requested. Reports should include for setting out timescales for follow up and who is responsible for that follow up.

23 Which regulators should be invited to report in round four?

Please list any regulators.:

Ofwat.

Guidance

24 Would your organisation be able to report on interdependent and cascading risks?

No

Please give any supporting reasons.:

ADA supports the concept of identifying and reporting interdependency and cascading risks. However, ADA recognises that this will increase the work required to complete the adaptation reporting process, especially when collecting and collating information from member bodies.

25 Would a requirement to report on the detail of interdependent risks help to drive progress in assessing and managing these?

Yes

Please give any supporting reasons.:

ADA recognises that it may help to better identify overlapping efforts and synergies in adapting to climate change between reporting bodies.

26 How can government encourage cross-sector working and collaboration on interdependencies as part of the adaptation reporting process?

How can government encourage cross-sector working and collaboration on interdependencies as part of the adaptation reporting process?:

This is best achieved by government bringing together the relevant bodies in a structured forum for discussion and action-setting. This process would require to be owned and led by the appropriate government department.

27 Would reporting templates be helpful for your organisation?

Yes

Please give any supporting reasons.:

28 Do you agree that following the template should be voluntary?

Agree

Please give any supporting reasons.:

29 What supporting guidance would be useful to minimise reporting burdens and ensure that reports are generating useful insights?

What supporting guidance would be useful to minimise reporting burdens and ensure that reports are generating useful insights?:

Useful reports contain data and information about the bodies being asked to report. The key to good supporting guidance is to establish a system of consistent and reliable data being provided and to have in place a system of random checks to verify data provided.

30 Should government pursue a standardised approach to risk assessment, including by mandating the use of specific climate scenarios?

Yes

How would this affect your ability to respond, and to assess risk according to your organisation's specific circumstances?:

ADA would support a more standardised approach to create greater consistency. ADA would support organisations voluntarily considering other climate scenarios in addition to those mandated.

31 Do you agree that organisations that reported in the third round should not be required to submit full risk assessments in round four, and that reports should instead focus on updates to actions taken in response to risks?

No

Please give any supporting reasons.:

This is not relevant to our sector as no reporting was undertaken in the third round.

ADA has responded no as no undecided option available.

Scope Expansion

32 Have we selected the right areas to prioritise for targeted scope expansion in the fourth round of reporting?

Yes

Please give any supporting reasons. :

ADA broadly supports the list of additional bodies prioritised for expansion in the fourth round.

ADA supports consideration for IDBs reporting within the fourth round, but highlights a need for greater guidance and support at this time before IDBs enter the reporting regime in a later reporting round.

33 Please select the targeted sector on behalf of which you are responding.

Agriculture and food supply chains

Scope Expansion (cont.)

34 How would a reporting pilot be received in your sector?

Well

Please list any reasons.:

ADA would expect that a reporting pilot would be welcomed in principle by the internal drainage board sector, but there would be concerns around new burdens similar to those expressed by the LGA and the wider local authority sector. IDBs would value additional advice and guidance rather than a new reporting requirement, and a mandatory approach would be unlikely to receive widespread support in the sector.

35 Which organisations from your proposed sector should be invited to report?

Please identify the sector on behalf of which you're responding. :

Canals and reservoirs

For that sector, which organisation should be invited to report?:

Internal drainage boards

How should we determine proportionality in this sector? :

ADA would be willing to discuss further details with Defra regarding taking part in a pilot in round 4 of the ARP on behalf of IDBs. However, ADA's focus at this current time with our limited resources as a small membership body is to deliver its commitments within the National FCERM Strategy Action Plan for England to provide guidance to the IDB sector exploring the potential strategies and techniques available to reduce carbon emissions associated with flood risk and water level management in lowland areas dependent upon pumping.

36 Would your organisation be willing to take part in a pilot in round 4 of the ARP?

Undecided - we would like to be contacted to discuss further

37 Do you agree with the approach we have set out to reporting by organisations with activities in the territorial extent of one or more of the devolved administrations?

No

Please elaborate.:

ADA answered no as no option for undecided was provided.

ADA would need to seek clarification from Defra, Welsh Government and Natural Resources Wales about whether adaptation reporting for IDBs should also include reporting on internal drainage district advisory groups in Wales that are administered by Natural Resources Wales.

Scope Expansion (LAs)

38 Do you agree that Local Authority reporting should be piloted with a small group of authorities in round four of ARP, to test the costs and benefits?

Yes

If yes, what form should this take? :

Yes, this approach seems proportionate and emphasises the need for guidance and support amongst smaller local public authorities, including IDBs. ADA would, however, draw attention to the fact that local authorities are also generally under-resourced for the FCERM work demanded of them.

Would your organisation be willing to take part?:

Undecided - we would like to be contacted to discuss further

39 What advice, guidance and incentives do Local Authorities need to help develop their climate risk management practices?

What advice, guidance and incentives do Local Authorities need to help develop their climate risk management practices?:

Given the extreme financial limitations that local authorities are facing, ADA would expect that staff resources would be the overwhelming barrier that must be overcome. Therefore, this will require central government funding support.

Organisations That Previously Reported

40 Have you reported in a previous ARP cycle?

No

Further review of Adaptation Reporting

43 What additional questions would you pose for future reviews of climate adaptation reporting?

What questions would you pose for future reviews of climate adaptation reporting?:

Consultee Feedback on the Online Survey

44 Overall, how satisfied are you with our online consultation tool?

Very dissatisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

ADA is a membership organisation for a range of public bodies involved in flood and water management across the UK. As such are involved across a number of the sectors identified in this consultation, namely:

canals and reservoirs,
agriculture, and
local authorities.

It was a very poorly designed consultation response form that prevented us from answering questions related to local authorities if we answered that we were responding in relation to one of those other sectors.

Also the numbering in the response form did not align with the numbering of questions within the consultation document. Which makes compiling our response in Word and then adding into the form more difficult and easier to make errors.

Therefore ADA has provided below our response to the questions related to local authorities that we were prevented from answering by the formatting of the online form:

Would your organisation be willing to take part in a pilot in round 4 of the ARP?

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Do you agree that Local Authority reporting should be piloted with a small group of authorities in round four of ARP, to test the costs and benefits? What form should this take? Would your organisation be willing to take part?

Yes, this approach seems proportionate and emphasises the need for guidance and support amongst smaller local public authorities, including IDBs. ADA would, however, draw attention to the fact that local authorities are also generally under-resourced for the FCERM work demanded of them.

What advice, guidance and incentives do Local Authorities need to help develop their climate risk management practices?

Given the extreme financial limitations that local authorities are facing, ADA would expect that staff resources would be the overwhelming barrier that must be overcome. Therefore, this will require central government funding support.