



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

## Response Template

March 2023



Northern Ireland  
Executive

[www.northernireland.gov.uk](http://www.northernireland.gov.uk)



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

### A. (Optional) What is your name?

Aidan McPeake

### B. (Optional) What is your email address?

[aidan.mcpeake@causewaycoastandglens.gov.uk](mailto:aidan.mcpeake@causewaycoastandglens.gov.uk)

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

- I am representing an organisation (*please continue with question D*)
- I am providing my personal views (*please move to question 1*)

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

Causeway Coast and Glens Council

### 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.

Annual emissions 7500 tonnes CO<sub>2</sub>e which includes all estates and fleet

**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.

Mandatory

Voluntary

Both

## 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.

Aligns with CCC expert advice

Allow sufficient run-in time to see actions embed, balance action with reporting due to limited resources, minimise reporting fatigue.

Agree with CCC's expert advice on adaptation reporting as set out at paragraph 3.4.2 of the full-length consultation document. This also aligns with the 5-yearly UK CCRA Cycles.

### 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.

By end of March 25 and/or submit 1<sup>st</sup> adaptation report for period 1<sup>st</sup> Jan 2025 to 31<sup>st</sup> Dec 2029 by 31<sup>st</sup> October 2025

Please tell us your REASONS for your chosen response.

Aligns with CCC expert advice and with Councils' normal reporting on a FY basis

- I. Agree with CCC's expert advice on adaptation reporting as set out at paragraph 3.4.2 of the full-length consultation document. The end of March 2025 aligns with the Council's business year/standard reporting cycle.
- II. allow for a reasonable period for any required training and capacity building within public bodies; II. allow time for public bodies to gather the information needed and to secure their own necessary organisational approvals and validations prior to submitting their reports; and III. be achievable for the wide range of types and sizes of public bodies that will be required to report with varying resource availability.

**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.

II. Submit the 1<sup>st</sup> mitigation report in the year/month following the submission date for submitting first Adaptation Report – 1<sup>st</sup> Mitigation report to be submitted by 31<sup>st</sup> October 2026, subsequent mitigation reports every 3 years cycle as per reasons below

Please tell us your REASONS for your chosen response.

- I. allow for a reasonable period for any required training and capacity building within public bodies;
- II. allow time for public bodies to gather the information needed and to secure their own necessary organisational approvals and validations prior to submitting their reports; and III. be achievable for the wide range of types and sizes of public bodies that will be required to report with varying resource availability.

**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.

To allow the Council sufficient time to focus on preparing its Mitigation Report following submission of its Adaptation Report in March 2025 and/or by 31<sup>st</sup> October 2026

Please tell us your REASONS for your chosen response.

Allow sufficient run-in time to see actions embed, balance action with reporting due to limited resources, minimise reporting fatigue, allowing Council sufficient time to focus on preparing its Mitigation Report following submission of its Adaptation Report in October 2025.

**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.

Aligns with other Council reporting schedules based on FY

The end of March aligns with the Council's business year/standard reporting cycle.

**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.

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

Other views on the TIMING of reporting.



**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.

A criteria-based proportionality approach will provide more certainty and clarity regarding those public bodies who need to report.

A criteria-based proportionality approach, as explained and presented in sections 4.4 and 4.5 of the Consultation Document, could be used to identify public bodies that have large estates and large staff numbers, high impact and influence over a range of policy areas and provision of services, significant expenditure, audit or regulatory functions. 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.

Please see answer to question 7

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

Please see answer to question 7

**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.

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

**10. (For North/South Implementation Bodies) Do you foresee any practical problems with dividing up the exercise of your functions in Northern Ireland, in order to report under the future regulations?**

- Reporting on our Northern Ireland functions would be straight-forward
- Reporting on our Northern Ireland functions would present a moderate but manageable level of challenge
- Reporting on our Northern Ireland functions would present extreme difficulty

Please tell us your REASONS for your chosen response.

**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.

Good for transparency of governance and bench-marking.

Data sharing agreements currently exist for other regulatory/reporting purposes. Arrangements could be extended to include this reporting requirement, as it would assist the Council in complying with the requirements.

**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.

Local Authorities will be duplicating efforts – LA's should finance a central Climate Commissioner Officer with support Staff to whom all required data is submitted -this should be put to a business case test for quantifying savings, benefits and any negative aspects for all 11 LA's providing a single joint report, with specific chapters for each geographical area describing any unique issues – more powerful working together to influence as stakeholders.

Where applicable/appropriate to assist the public bodies and to avoid duplication of work. This would align with current procedures in the UK, Isle of Man and Scotland.

**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.

**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. (For organisations only) Do you think that your organisation could currently provide the level of detail requested in the example draft reporting template?**

	Could currently provide <b>all</b> of the detail	Could currently provide <b>some</b> of the detail	Could currently provide <b>none</b> of the detail
Part 1 – Profile of Organisation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 2 -Climate Change Management and Governance	<input type="checkbox"/>	<input checked="" 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer.

Answer for Qu.15 - part 4.1: Please state clearly the base year for Local authorities noting they reduced from 26 to 11 super councils in 2015 and records for the super councils only commenced recorded from April 2015

Answer for Qu.15 - part 5: Structures not in place to validate

If base year is 1990, then Council will be unable to report as this info is not available

**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.



The draft template should have a review date “built-in! i.e. given that the development of structure and staff has not commenced thus not completed and officers completing this consultation and template validation may not be in place. It is key that when structures/resources are in place this is received and endorsed by the correct authorised RO’s and adopted by Council 3.2 question c) – co-benefits for reducing emissions could be listed, as examples to consider, along with potential risks associated to adaptation actions. Examples could 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. 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.

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.

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.

Funding and/or DfC increase financial support grant required.

Clarity on likelihood/severity scores and how they are reached

Please tell us your REASONS for your chosen response.

There should be a generic but bespoke LA training manual that can be used by all LA Officers as their reference document with facility for removing outdated sections and inserting updated sections as the process proceeds and develops over time

**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.

RO sign off 1st, SMT 2<sup>nd</sup>, and final agreement by full Council

Please provide your REASONS or any further comments.

This process must have joint agreement of members and top-down leadership from SMT and the RO

**19. (For organisations only) 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.

Information not available at this time of submission 30<sup>th</sup> June 2023 but it is anticipated that resource will be significant

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

The impact of this new legislation is significant and will cause unfair onus on local authorities given the economies of scale are with central government to create local and national green grids and networks. Finance, tools and solutions are currently unavailable. The new legislation by default commences enforcement as the reporting will provide a convenient lobby group leverage tool. Solutions, tools and finance should have been in place prior to reporting to ensure local authorities can avoid such impending unnecessary negative lobbying and reputable damage.

**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.**

It is important that there is clarity on future targets and the role of public bodies in meeting these. It will also be necessary to determine an emissions base year (2015-2016 for new Councils) and ensure consistent data collection and reporting methodologies. The reporting mechanisms for adaptation and mitigation should be designed to be as streamlined and efficient as possible to avoid undue bureaucracy and detraction from actual climate action delivery. It is also critical to reflect the importance of biodiversity as a key performance indicator in the battle against climate change and to include this in the reporting duties. In particular, local authorities require sufficient funding to increase their skills and capacity to deliver climate action and produce reports.

In addition, the UK CCC recognises that local authorities want to catalyse investment and add value by maximising social, environmental and economic returns from spending on energy efficiency, heat decarbonisation and transport.

Funding should be provided to support natural capital accounting across Northern Ireland in order to accurately determine the full range of ecosystem services available in each council area. This should also be supported by a Green Fund to deliver nature based solutions across Northern Ireland delivering resilience and mitigation.

Funding should also be made available to ensure that all government and public sector projects and initiatives are climate smart – leading by example and supporting wider decarbonisation across society through capital development, green procurement, funding policies, green jobs and investment.

Climate Change Public Body Reporting  
Climate Change and Green Growth Policy Division  
2nd Floor, Klondyke Building  
1 Cromac Avenue  
Gasworks Business Park  
Belfast  
BT7 2JA

Tel: 028 9056 9291 / 028 9056 9246

Email: [climatechangediscussion@daera-ni.gov.uk](mailto:climatechangediscussion@daera-ni.gov.uk)

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)