

Committee on Climate Change  
Adaptation Sub-Committee  
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10th September 2009

Rosemary Love  
Adapting to Climate Change Programme  
Department for the Environment, Food & Rural Affairs  
Area 3A Nobel House  
17 Smith Square  
London SW1P 3JR

Dear Rosemary,

**Adaptation Sub-Committee response to the consultation on the Adaptation Reporting Power in the Climate Change Act 2008.**

The Adaptation Sub-Committee (ASC) welcomes the opportunity to respond to the consultation on the Adaptation Reporting Power. The ASC is part of the Committee on Climate Change, a non-departmental public body providing independent advice to the Government and the national governments of Wales, Scotland and Northern Ireland on climate change mitigation and adaptation.

Climate change is one of the greatest challenges facing society today and it is imperative that organisations responsible for providing the critical services upon which society relies are prepared for a changing climate. Adaptation is an essential part of addressing the challenges and opportunities climate change presents. We therefore welcome the Government's initiative to direct public authorities and statutory undertakers to consider the implications of climate change for the services they deliver and to report on their preparedness.

We recognise this is a challenging task and one that will require detailed preparation. In the Committee's view the Reporting Power Framework should be seen as an opportunity to encourage learning throughout society about the adaptation challenges facing the UK. This could be facilitated

under the power by providing feedback and technical assistance to those organisations that have been asked to report. This response sets out our views on:

- the proposed role for the ASC [paragraph 5.32] under the Adaptation Reporting Power,
- the authorities to be included in the first round of reporting,
- the format of reports and
- the Statutory Guidance and supporting advice.

### **ASC role**

The consultation document proposes that the ASC:

- summarise and report to the Secretary of State on lessons learned on the risks, impacts and preparedness of each sector covered by the reports and once the UK Climate Change Risk Assessment (CCRA) is produced;
- analyse the CCRA to identify those authorities that it considers to be a priority to be given a Direction and report to the Secretary of State either within a future reporting strategy, or in the interim as a matter of urgency; and
- provide advice on whether there are any authorities that should be asked to report jointly under this power.

Regarding the first task, the Committee believes that it should develop a high level overview of the reports, but that there is not enough Committee time, or Secretariat resource, to review every report. The Committee could review a summary, which another organisation would need to produce. However we are not in a position to coordinate or resource an organisation to undertake this task. It could potentially be done by Defra or contracted out by them. On reviewing the summary, the Committee could decide to probe further into individual reports which offered valuable lessons or insights for adaptation policy. The Committee could then report to the Secretary of State on its conclusions.

The Committee agrees with the consultation document that it should advise on whether other organisations should report under the power and advise on whether organisations could report jointly.

### **Authorities to be included**

We support the strategy for using the power as proposed in the consultation document and the resultant list of priority reporting authorities. We have noted that the Regional Development Agencies

(RDAs) were excluded from the reporting powers requirement because the Government proposes to include a requirement within the Local Democracy, Economic Development and Construction Bill to embed climate change adaptation within Regional Strategies developed by the RDAs and local authority leader's boards. However we believe that the requirements under the Bill should be equivalent to those proposed under the Reporting Powers Framework.

### **Format of the reports**

At present, the guidance does not define a particular methodology or approach for the reports. This flexible approach will demonstrate to Government that some adaptation analysis is taking place but the lack of a common structure for reports means that it will be much more difficult to compare reports and extract generic lessons. The Committee believes that if Defra wishes to use the reports to provide evidence for future cycles of the CCRA then a more prescriptive approach will be required. A standardised format for the reports would assist in the process of summarising the reports, aid comparability between organisations and help guide those that need to provide the information.

### **Guidance and advice**

The core of the guidance appears to be the 20 or so 'Questions to ask when developing a risk assessment' (p84/85). The Committee's view is that these largely relate to process, rather than action, and could encourage tick box answers from reporting authorities. Furthermore for meaningful comparison between reports it is necessary for any assumptions to be transparent, in particular: the timing and spatial scale of impacts, methods for generating impact variables from climate data, tolerances for risk and, where possible, the value of impacts and the method of monetising these. Furthermore, it is likely to be more helpful if reporting authorities were first asked how services are currently affected by climate and how they manage these risks, before being asked to analyse the implications of, and their response to, future risks.

We support the Government's intention to provide the necessary information and tools to help authorities prepare their reports, and offer several suggestions for how this guidance might be developed. These include:

- Defra should clarify how the Government would use the reports to improve the adaptive capacity of the UK. And whether it proposes to develop a two-way dialogue with reporting organisations, offering feedback on submitted reports.

- We recognise the valuable contribution the UKCP09 projections have made to our ability to model future climate and quantify the uncertainties. However, the UKCP09 projections provide information on climate parameters (e.g. temperature, precipitation, sea surface temperature etc.) but not on the impacts of climate change (e.g. flood risk, agricultural yields), which are likely to be of particular interest to reporting authorities. The usefulness of the projections is also limited when assessing near-term impacts. We recommend the Government should identify sources of expertise, or develop these where they do not exist, where organisations can seek advice on the impacts that are relevant to them.
- The UKCP09 projections do not include mitigation. Yet those organisations writing reports will be aware of international efforts to agree on emissions targets and how importantly these can affect climate outcomes for the UK in the future. We recommend the guidance should make clear that the four families of emissions scenarios developed in the Intergovernmental Panel on Climate Change's (IPCC) Special Report on Emissions Scenarios (SRES) used in UKCP09, assume no mitigation. Allied to this is our recommendation that Defra offers greater 'technical assistance' to reporting authorities in using and interpreting the available information.
- For the first time the UKCP09 projections provide a measure of the uncertainty in the range of possible future climate outcomes. This represents a major advance beyond previous national scenarios. We feel there is a role for Government to communicate this uncertainty, and indeed the uncertainties inherent in this type of assessment, to users of this information. At present the guidance leaves the choice of climate change scenario to the national authorities discretion. We believe the guidance should encourage authorities to 'stress test' their service delivery against a range of possible scenarios.
- As authorities will be asked to report at different times from the date of the Directions, we feel that Defra should consider reviewing the effectiveness of its guidance and tools after several organisations have had an opportunity to use them. It would not be necessary to delay issuing Directions since changes to guidance could be introduced for those that report later and subsequent reporting rounds.
- We recommend establishing a peer review system where organisations could review each other's reports. This would aid learning both within and between sectors, and facilitate the development of good practice.

The improvements we suggest to the Reporting Powers Framework should provide greater certainty to those that need to report and improve the usefulness of the reports to government. As a Committee

we look forward to working with Defra and other stakeholders in using the information generated to improve the UK's capacity to adapt to the future impacts of climate change.

Yours sincerely,

John Krebs