

## NI Government Consultation on Climate Change Reporting by Specified Public Bodies – Developing new Regulations

### MAG Response

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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.:

Ministerial Advisory Group for Architecture and the Built Environment.

About You - Organisations

Which area do the functions of your organisation fall under?

Other.

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

Ministerial Advisory Group for Architecture and the Built Environment.

(covering natural & built environment)

What size is your organisation?

50 - 249 FTE staff.

Less than £1 million.

Does your organisation currently report on climate change?

Yes.

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

Climate Group Action plan is reported annually for the Ministerial Advisory Group for Architecture and the Built Environment.

Voluntary.

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

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

Every 4 years.

Please tell us your REASONS for your chosen response.:

4-5 years gives time allowance for internal annual monitoring of data and time to respond/adjust actions in order to meet organisations targets.

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

By end of March 2025\*

Please tell us your REASONS for your chosen response. :

March 2025 would allow for one full year of data to be collected (Jan 2024 to Dec 2024), and then allow the team to process data and submit report.

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

Every 4 years\*

Please tell us your REASONS for your chosen response.:

(as above)

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

By end of 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.

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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:

For all reporting, there should be support for organisations who are unclear on what and how to collect data.

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.

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

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.

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

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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.:

Data can be shared, but reporting should be separate for accountability.

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

No.

Please tell us your REASONS for your chosen response.:

Unfortunately no. Joint reporting will reduce accountability. The climate crisis is at a point where that can no longer be an option.

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

Online portal.

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.

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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 none of the detail.

Orgs - Template ability - Part 4.2 - Mitigation Action Plan (i.e. Emissions Reduction Plan):

Could currently provide none of the detail.

Orgs - Template ability - Part 5 - Validation of Report:

Could currently provide all of the detail.

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?

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.

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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.

It is good to have a reporting template. The current template could be revised to be more specific and measurable. The reporting template is important and should be developed to explicitly outline what data is required on progress (eg a list of mandatory data, for example, all organisations). The template in the current format and would allow for outline answers without linking to measurable & specific data and how that meets benchmarks. The requirement for adding in benchmarks against their data and RAG rating for GHG emissions would help organisations with realising impact and future planning.

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.:

Both training and guidance document for reference would be required.

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.:

Yes - this should include a signed cover letter from organisation senior management to outline the approach, progress and include the declaration

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that 'The information presented in the report (including qualitative and quantitative data) is an honest, accurate and true representation of the organisation.'

Signed by the lead of organisation. This is to ensure accountability.

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.:

n/a

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: None

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.:

Thank you to the team working on this important aspect of the climate emergency. Accountability and incentivising climate action and progress are key to developing Northern Ireland's response. The first step of public bodies being conscious of the issue, collecting data and developing action plan is significant and critical for future planning.

**Clare Mulholland**

**MAG Member**

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