

## Strategy for the Fifth Round of Climate Adaptation Reporting Consultation

*Department for Environment, Food & Rural Affairs*

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This submission is from UK100 which is a network of 122 strategic and local authorities and the only network of ambitious councils led by all political parties working together to tackle climate change. We help local leaders overcome challenges and turn innovation into solutions that work everywhere. We build the case for the powers needed to make change happen. From cities to villages, we help communities across the UK create thriving places powered by clean energy – with fresh air to breathe, warm homes to live in, and a healthy natural environment.

Please get in touch if you would like to know more or explore our response in more detail. We would be happy to provide a UK100 representative or member for any follow up discussions.

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### Q2. Do you agree or disagree to the proposed objectives and principles for ARP5? Please explain your reasons (optional)

#### Agree/Disagree/Unsure

- **Clearer reporting framework:** The proposed objectives and principles provide a strong foundation for improving the consistency, and comparability of climate adaptation reporting across sectors.
- **Balanced proportionality:** The principles around proportionality and flexibility are important, particularly for organisations with differing levels of capacity and maturity. However, proportionality must not weaken the ambition or quality of reporting, especially for sectors and organisations managing significant climate risks.
- **Supporting actionable reporting:** Reporting should produce actionable insights that help organisations identify risks, prioritise adaptation measures, and inform effective resilience planning.
- **Reducing duplication:** Greater alignment between reporting requirements and existing local and national policy frameworks would help reduce duplication and reporting burdens. This is particularly important for local authorities and combined authorities already managing multiple climate, infrastructure and resilience reporting obligations.

- **Improving coordination:** The framework would be strengthened by clearer expectations around collaboration and data sharing between national government, infrastructure providers, regulators, and strategic and local authorities. Effective adaptation depends on coordinated planning across interconnected systems and geographies.
- **Supporting delivery capacity:** The focus on improving evidence and transparency is welcomed but it is important to note that reporting alone will not drive adaptation at the scale required. Organisations subject to reporting requirements need access to long-term funding, technical guidance, climate risk data, and capacity-building support to enable meaningful action.
- **Focusing on measurable outcomes:** ARP reporting should place greater emphasis on measurable adaptation outcomes and how reporting supports practical resilience improvements over time.
- **Linking reporting to decisions and investment:** The framework should more clearly demonstrate how reporting informs investment decisions, infrastructure planning, service delivery, and long-term adaptation action.
- **Clarifying the use of reporting outputs:** Government should provide greater clarity on how ARP findings will be analysed and used to inform national adaptation priorities, sectoral resilience planning, and future Climate Change Risk Assessments.

**Q3: Do you agree or disagree that government should make targeted use of the power in the CCA 2008 to direct selected organisations to report, whilst maintaining the voluntary approach with the remainder? Please give reasons**

#### **Agree/Disagree/Unsure**

- **Recognising local government's role:** Local (and increasingly strategic) authorities play a central role in responding to climate risks affecting communities, infrastructure, housing, health, and local economies. Any targeted approach should recognise the importance of place-based adaptation and ensure local government is adequately supported to participate effectively.
- **Providing adequate support:** Where organisations are directed to report, government should also provide sufficient guidance, access to climate risk data, and long-term capacity support. Reporting requirements without corresponding resources may limit the quality and usefulness of submissions.
- **Learnings from previous indicators:** Previous national indicators on climate adaptation and emissions, including NI185, NI186 and NI188, helped provide political recognition and accountability for local climate action, especially NI186. Evidence from local authorities suggests these indicators often prompted coordinated climate action for the first time and helped embed climate considerations across service areas.

- **Targeting key risk holders:** UK100 supports the targeted use of powers to direct organisations with significant responsibilities for critical infrastructure, essential services, and public resilience to report. A targeted approach can help address persistent gaps in adaptation preparedness across nationally important sectors.
- **Value of reporting:** Alongside mandatory reporting requirements, ARP should provide clear practical value by improving understanding of interdependencies, supporting cross-sector coordination, and strengthening adaptation planning across local, regional, and national levels rather than functioning solely as a compliance exercise.
- **Improving consistency:** Maintaining a solely voluntary approach risks uneven participation and inconsistent reporting quality. Directed reporting can help establish a more comprehensive and reliable evidence base for assessing national climate resilience.
- **Recognising uneven devolution and local government reorganisation (LGR):** While we recognise the growing role of Strategic Authorities and combined authorities in place-based adaptation and resilience planning, this must be accompanied by mechanisms to ensure that areas undergoing reorganisation, or those without devolution agreements, are not left behind or unsupported. Adaptation reporting frameworks should provide clarity over responsibilities across different governance arrangements and ensure all local areas have access to sufficient capacity, data, and long-term support.

**Q4: Do you agree or disagree with the proposed tests to determine who would receive a direction to report? Please give reasons.**

**Agree/Disagree/Unsure**

- **Targeting gaps in reporting:** UK100 supports the proposed approach of using directions selectively to address gaps in reporting. Prioritising organisations based on specific criteria is a proportionate way to strengthen the national adaptation evidence base.
- **Recognising the role of local and strategic authorities:** UK100 welcomes the proposal to include Strategic Authorities within the scope of reporting, reflecting the passage of the English Devolution and Community Empowerment Act and their growing responsibilities in areas such as transport, housing, economic development, spatial planning, health inequality, and local resilience. However, Strategic Authorities cannot report effectively in isolation, as many adaptation and resilience functions and responsibilities are delivered through constituent local authorities. Any reporting framework should therefore support collaboration between Strategic Authorities and local authorities; alongside adequate funding and capacity support, to ensure reporting reflects on-the-ground delivery and helps embed adaptation within local planning and service delivery.

- **Recognising uneven devolution:** While it is the intention of the Government to ‘complete the devolution map’ in England by the end of this parliament, alongside an ambitious programme of local government reorganisation, the roll out has been patchy and subject to some delay. We recognise the focus on Strategic Authorities, but aligned to that must also be a mechanism to ensure that local authorities going through reorganisation and parts of the country without a devolution agreement are not left behind and unsupported.
- **Encouraging adaptation planning:** While this cannot replace a statutory duty on climate, In the absence of one, participation in reporting can help Strategic Authorities and constituent local authorities assess climate risks, identify gaps, begin taking action, and better integrate adaptation and resilience considerations into local plans, policies, and service delivery.
- **Need for clearer selection criteria:** The proposed tests focus primarily on previous participation in reporting rounds rather than the scale of climate risk, public exposure, or adaptation responsibilities. Government should provide clearer justification for how organisations are prioritised to ensure the approach remains transparent, risk-based, and aligned with national resilience objectives. Organisations whose disruption could create cascading impacts across critical infrastructure, public services, or geographic areas should be prioritised within the reporting framework.

**Q5: Are there any other criteria that should be used to target directions? If yes, please give details.**

**Yes/no/don't know**

- **Exposure to climate risk:** Directions should also consider the extent to which organisations, services, or assets are exposed to significant climate risks, including flooding, overheating, drought, coastal erosion, and infrastructure disruption. A stronger risk-based approach would help ensure reporting reflects current and future climate vulnerabilities, including health and inequality.
- **Role in local resilience and delivery:** Criteria should recognise organisations that play a key role in delivering local resilience and adaptation outcomes, particularly where responsibilities are shared across strategic authorities, local authorities, infrastructure providers, and public services. This would better reflect the place-based and interconnected nature of climate adaptation.
- **Capacity-building potential:** Reporting directions should also be used strategically to help build adaptation maturity in sectors or organisations where climate risk management remains underdeveloped. In the absence of wider statutory adaptation duties, reporting can help organisations review risks, identify actions, and integrate adaptation into plans and decision-making processes.

- **Consistency with local and regional governance:** Where Strategic Authorities are directed to report, government should also consider how constituent local authorities contribute to adaptation delivery. Reporting arrangements should support collaboration across governance levels to ensure reports accurately reflect local implementation and resilience activity.
- **Considering system-level influence:** Criteria should consider the extent to which organisations influence wider infrastructure systems, procurement and supply chains, land use patterns, and regional resilience outcomes.
- **Recognising interdependencies and cascading risks:** Organisations whose operations are relied upon across multiple sectors should be prioritised, particularly where disruption could create cascading impacts across critical services or infrastructure systems.
- **Reflecting geographic significance:** Consideration should also be given to organisations operating across large or strategically important geographies, including major river catchments, regional infrastructure networks, and areas facing significant climate vulnerability.

**Q6: Do you agree or disagree that additional incentives for voluntary reporting are needed? Please give reasons and/or suggestions for incentives.**

#### **Agree/Disagree/Unsure**

- **Recognising leadership and good practice:** Measures such as a voluntary reporting 'charter mark' could help recognise organisations demonstrating leadership on climate adaptation and resilience. Public recognition may also help raise the profile of adaptation within organisations and support internal prioritisation.
- **Ensuring incentives are meaningful:** Incentives should go beyond reputational recognition and be linked where possible to wider policy, funding, or partnership opportunities. Organisations are more likely to engage where reporting supports practical outcomes, learning, and access to support.
- **Supporting local authorities to participate:** Additional incentives could help encourage greater engagement from Strategic Authorities and local authorities, particularly in the absence of wider statutory adaptation duties. However, participation will depend on sufficient funding, officer capacity, technical guidance, and access to climate risk data.
- **Promoting continuous improvement:** Incentives should encourage organisations not only to participate, but also to improve the quality and maturity of their adaptation planning over time. Reporting frameworks should support learning, collaboration, and the integration of adaptation into long-term planning and decision-making.

**Q7: Do you agree or disagree that reporting should be expanded to include strategic authorities? Please give reasons.**

**Agree/Disagree/Unsure**

- **Strengthening regional adaptation leadership:** UK100 supports expanding reporting to include Strategic Authorities given their growing role in coordinating transport, housing, economic development and spatial planning. Strategic Authorities are well placed to convene partners and embed climate adaptation within regional growth and infrastructure planning.
- **Supporting place-based coordination:** Climate risks cut across administrative and sectoral boundaries, requiring coordinated responses across transport, utilities, health, housing, and local resilience systems. Strategic Authorities can help align adaptation planning across these interconnected systems and support more consistent regional approaches.
- **Recognising the role of constituent local authorities:** Strategic Authorities cannot report effectively in isolation, as many adaptation and resilience functions are delivered through constituent local authorities. Reporting arrangements should therefore support collaboration between Strategic Authorities and local authorities to ensure reports accurately reflect local delivery challenges, risks, and implementation activity.
- **Providing adequate funding and support:** The findings from the ARP4 pilot highlight the significant resource and capacity constraints facing local government, with many invited authorities declining to report due to financial and staffing pressures. We welcome the recognition that 'new burdens' funding may be required, but believe this support should also extend to constituent local authorities if they are expected to contribute meaningfully to Strategic Authority reporting. The pilot evidence showing lower median reporting costs for local authorities is encouraging and suggests that, with appropriate support, adaptation reporting can be delivered proportionately while helping strengthen local adaptation planning and capability.
- **Recognising the role of local and strategic authorities:** Strategic Authorities are playing an increasingly important role in transport, housing, planning, economic development, and local resilience. However, effective adaptation reporting will also require strong collaboration with constituent local authorities, alongside adequate funding and capacity support, to ensure reporting reflects local delivery and implementation.
- **Recognising uneven devolution and reorganisation:** As devolution and Local Government Reorganisation (LGR) continue to develop unevenly across England, reporting arrangements should ensure that areas without devolution agreements, or those undergoing reorganisation, are not left behind and have access to appropriate support, clarity, and resources.

## Q8: Should reporting by strategic authorities be mandatory or voluntary?

Please give reasons

### Mandatory/Voluntary/Don't know

- **Ensuring consistent adaptation action:** Mandatory reporting for Strategic Authorities is more likely to drive consistent engagement with climate adaptation, strengthen accountability, and ensure adaptation is integrated into regional planning and decision-making processes. However, mandatory reporting must be accompanied by adequate 'new burdens' funding, including support for constituent local authorities that contribute to reporting and delivery, alongside access to technical expertise, capacity-building, climate risk data, and shared support frameworks where needed.
- **Using a phased approach to reporting:** A phased approach for Strategic Authorities may be more appropriate given that authorities are at different stages of institutional development, governance maturity, and adaptation capacity. Beginning with a supported voluntary approach could help build capability, strengthen local engagement, and establish effective reporting processes before moving towards more formal mandatory requirements over time.
- **Supporting regional coordination:** Mandatory reporting (especially when accompanied by funding and support) can help Strategic Authorities play a stronger convening role across constituent local authorities, infrastructure providers, utilities, and public services. This is particularly important given the cross-boundary and interconnected nature of climate risks and adaptation delivery.
- **Providing adequate funding:** Mandatory reporting must be accompanied by sufficient 'new burdens' funding to avoid placing additional pressure on already stretched local government resources. This support should also extend to constituent local authorities where they are expected to contribute evidence, data, and delivery input into Strategic Authority reporting.
- **Aligning with devolution reforms:** ARP5 should align with the emerging strategic functions and areas of competence being established through English devolution reforms, helping embed climate adaptation within regional planning, infrastructure, and resilience governance.
- **Building local capacity and expertise:** Strategic Authorities and constituent local authorities should have access to ongoing technical guidance, climate risk data, peer learning opportunities, and specialist adaptation expertise where needed. This will be important to address capability gaps and support more consistent and effective reporting across regions.
- **Recognising local authority delivery roles:** While Strategic Authorities can provide regional coordination and leadership, many adaptation and resilience measures are delivered by constituent local authorities.

Reporting arrangements should therefore reflect the important operational and place-based role local authorities play in managing climate risks and delivering adaptation on the ground.

#### Q9: What support is needed for successful reporting by strategic authorities?

- **Long-term funding support:** Strategic Authorities and constituent local authorities will require adequate long-term funding to support staff capacity, data collection, stakeholder engagement, and reporting activities.
- **Technical guidance and methodologies:** Clear and standardised guidance will be needed to help Strategic Authorities translate climate scenarios into service-level risks and adaptation priorities. This should include practical methodologies, templates, examples of good practice, and sector-specific guidance to improve consistency while allowing for place-based flexibility.
- **Access to climate risk data:** Strategic Authorities and local authorities need access to high-quality, locally relevant climate risk data, projections, and mapping tools. Data should be accessible, consistent, and usable for planning across functions such as transport, housing, infrastructure, health inequality, clean air, emergency planning, and economic development.
- **Capacity-building and expertise:** Many authorities will require additional officer capacity and access to specialist adaptation expertise to undertake effective reporting. Government should work with organisations like UK100, Adept and the LGA to support peer learning networks, training programmes, and opportunities to share best practice across regions and sectors.
- **Integration with existing plans and duties:** Reporting requirements should align with existing local and regional planning processes, resilience frameworks, and climate strategies to minimise duplication and support integration into decision-making. This will help ensure reporting drives practical adaptation outcomes rather than becoming a standalone compliance exercise.
- **Recognition of varying maturity levels:** Strategic Authorities are at different stages of 'establishment', adaptation maturity and institutional development. Support frameworks should therefore be flexible and tailored, recognising differing governance arrangements, resources, and levels of existing climate capability. This will also change during the time period covered by ARP5.

#### Q10: Do you have any comments or suggestions regarding the proposed additional scope changes?

- **Supporting broader sector coverage:** The proposed expansion of reporting across sectors including energy, transport, land management, telecommunications, and health is welcome. Broadening coverage will help strengthen understanding of systemic climate risks and improve

national resilience planning across interconnected infrastructure and service networks.

- **Balancing individual and collective reporting:** It is good to see the move towards individual reporting for organisations with significant infrastructure or operational responsibilities, particularly where collective reporting may obscure important risks or adaptation actions.
- **Providing consistent support and guidance:** As reporting expands into new sectors and organisations, government should provide clear methodologies, standardised guidance, and access to technical expertise to support consistent and proportionate reporting. This is particularly important for organisations with less established adaptation capacity or experience.
- **Including high-impact sectors:** Government should ensure that sectors with the greatest exposure to climate risks and the largest environmental and infrastructure impacts are fully included within the reporting framework.
- **Linking reporting to delivery:** Reporting should be clearly linked to adaptation action and decision-making rather than becoming a standalone reporting exercise. Organisations should be encouraged to demonstrate how reporting outcomes inform investment decisions, resilience planning, governance arrangements, and long-term adaptation measures.
- **Strengthening national coordination and analysis:** Government should provide greater clarity on how information gathered through ARP5 will be analysed, integrated, and used nationally to inform adaptation policy, infrastructure planning, and resilience priorities. There should be a clear approach for synthesising reporting findings and identifying cross-sector risks, dependencies, and national adaptation gaps.
- **Reducing duplication and reporting burdens:** Many organisations are already subject to multiple reporting and regulatory requirements relating to climate risk, resilience, infrastructure, and environmental performance. ARP5 should align with existing reporting frameworks wherever possible to minimise duplication, streamline processes, and make participation as straightforward and proportionate as possible.

**Q11: Do you agree or disagree with new sector-neutral guidance on additional aspects of climate risk management? Please give your reasons and/or suggestions.**

#### **Agree/Disagree/Unsure**

- **Supporting greater consistency and maturity:** The proposed sector-neutral guidance and the continued alignment with recognised standards is welcome. Additional guidance on interdependencies, adaptation pathways, monitoring and evaluation, and climate risk

management maturity could help strengthen the quality and consistency of adaptation reporting across sectors.

- **Providing practical and proportionate guidance:** Guidance should remain practical, accessible, and proportionate, particularly for organisations and local authorities with more limited adaptation capacity or experience. There is a risk that increasingly complex reporting expectations could create additional burdens without corresponding support or clear links to decision-making and delivery.
- **Clarifying how reporting informs action:** Government should provide greater clarity on how enhanced reporting and risk assessment processes will translate into practical adaptation outcomes, investment decisions, and policy change. Reporting should support implementation and resilience planning rather than becoming primarily a technical or compliance exercise.
- **Improving support for local and regional government:** Strategic Authorities and constituent local authorities could require tailored support to apply concepts such as cascading risks, adaptation pathways, and climate scenario analysis within local service delivery and planning functions. This should include practical examples, peer learning opportunities, access to specialist expertise, and locally relevant case studies.
- **Strengthening cross-sector integration:** Guidance should place greater emphasis on understanding interdependencies between sectors and governance levels, including the relationship between national infrastructure, Strategic Authorities, local authorities, and public services. Adaptation planning is inherently cross-sectoral and place-based, requiring stronger coordination across systems and institutions.

**Q12: Do you agree or disagree that sector-specific guidance would be useful for ARP5? Please give reasons.**

**Agree/Disagree/Unsure**

- **Improving consistency and relevance:** It would be beneficial to develop sector-specific guidance to help improve the consistency, quality, and relevance of reporting across different sectors. Different sectors face distinct climate risks, regulatory environments, operational structures, and adaptation challenges that are not always captured through generic guidance alone.
- **Supporting practical implementation:** Sector-specific guidance could help organisations better translate climate scenarios and adaptation principles into operational risks, investment decisions, and service delivery planning. This is particularly important for sectors where adaptation responsibilities are complex or highly place-based.
- **Ensuring co-production with practitioners:** Sector-specific guidance should be co-developed with sector representatives, local government,

infrastructure providers, and practitioners to ensure it reflects operational realities and existing good practice. This will help improve usability and encourage stronger engagement with reporting.

- **Maintaining comparability across sectors:** While sector-specific guidance can improve relevance and usability, reporting frameworks should still maintain a level of consistency and comparability across sectors. This will be important to support cross-sector coordination, identify interdependencies and systemic risks, and enable government to develop a coherent national picture of climate resilience and adaptation progress.

**Q13: Would your organisations agree or disagree to participating in the codevelopment of sector-specific guidance with government? Please give reasons.**

**Agree/Disagree/Unsure**

As a network of local authorities and combined authorities UK100 would welcome the opportunity to support and contribute to sector specific guidance as part of a co-development process with government. We can help convene strategic and local authorities to help ensure guidance reflects the practical realities of adaptation reporting and delivery on the ground. We are extensively involved in supporting our members through both devolution and local government reorganisation, both of which provide a complex structural, strategic and policy backdrop to the time period covered by ARP5.

Given the new proposed reporting focus on strategic authorities, many of whom are relatively new or still emerging, we would emphasise the need to work with them and their constituent local authorities, who may be more experienced with reporting under previous ARPs. It is vital as well that support is in place to assist with this transition, and that areas of England where new strategic authorities have yet to be fully formed are not excluded from this process and wider local government is involved.

Collaborative development will be important to ensure guidance is practical, proportionate, and usable while remaining sufficiently consistent across sectors and governance levels to support comparability, peer learning, and stronger adaptation planning.

**Q14: Do you agree or disagree that ARP reporting is a valuable addition to corporate climate disclosures and/or existing sector-specific regulatory Obligations? Please give reasons.**

**Agree/Disagree/Unsure**

- **Providing a broader adaptation picture:** ARP reporting provides valuable additional information beyond corporate climate disclosures and existing

regulatory requirements. It plays an important role in ensuring organisations periodically assess climate risks, review adaptation actions, and track progress over time. This longer-term and more strategic approach is valuable for supporting national and local resilience planning beyond immediate financial risks.

- **Complementing existing reporting frameworks:** ARP should complement rather than duplicate existing climate disclosure and regulatory reporting requirements. The proposed approach allowing organisations to reference existing disclosures and reports where appropriate is welcome and could help streamline reporting processes.
- **Improving cross-sector coordination:** ARP reporting can provide additional value by helping government identify interdependencies and systemic climate risks across sectors and places. A clearer explanation is needed on how information gathered through ARP5 will be analysed nationally and used to inform cross-sector resilience planning, infrastructure policy, and adaptation priorities.
- **Clarifying links to action and decision-making:** Government should ensure that reporting outputs are clearly linked to practical adaptation outcomes, investment decisions, and policy development. Reporting frameworks are most effective where they support implementation, learning, and continuous improvement rather than becoming standalone compliance exercises.

**Q15: Do you agree or disagree that ARP reporting is a valuable addition to existing sector-specific regulatory obligations? Please give reasons.**

**Agree/disagree/unsure**

**Apart from the points in Q14**

- **Improving usability of reporting outputs:** To maximise value, ARP outputs should be accessible, actionable, and designed to support organisational decision-making, cross-sector risk understanding, and stronger alignment between local, regional, and national adaptation planning.
- **Strengthening links to investment and delivery:** Stronger connections between reporting, planning, and investment decisions would help organisations use ARP findings to inform practical adaptation measures and long-term resilience strategies.

**Q16: (optional) In what further ways can Defra reduce duplication between ARP and other climate risk reporting your organisation is subject to?**

- **Role of local government:** While UK100 is not subject to climate risk reporting, our 122 strategic and local authority members are. We have made extensive submissions to government about the need for a statutory climate and nature duty, and the need for wider local government

reporting to include climate and nature targets. Most recently we made that case when MHCLG consulted on their new Local Outcomes Framework, it would be useful, while avoiding duplication, if key reporting avenues like this were better aligned and strengthened, especially given the new English Devolution and Community Empowerment Act, growing devolution and local government reorganisation.

- **Aligning with existing reporting frameworks:** ARP should align with, and build upon, existing mandatory and voluntary climate reporting frameworks to avoid duplication and reduce reporting burdens. Many organisations already report through mechanisms such as TCFD-aligned disclosures and voluntary frameworks including CDP, and the proposed ability to reference existing reports where appropriate is therefore welcome.
- **Aligning reporting timelines:** Where possible, ARP reporting timelines should align with existing regulatory, organisational, and climate reporting cycles to reduce administrative burdens and support integration into established governance and planning processes.
- **Integrating reporting into wider decision-making:** ARP outputs should be more clearly integrated into wider regulatory, planning, infrastructure, and investment processes to reinforce their practical value and avoid reporting being seen as a standalone compliance exercise.

**Q17: Do you agree or disagree that economically regulated companies reporting in ARP5 should be set a shorter deadline to submit their reports, to enable regulators to take them into account in their reports? Please give reasons.**

NA

**Q18: How much less time than the standard 3-year window should economically regulated companies be given to report? Please give reasons and/or other comments. [multiple choice]**

NA

**Question 19: Do you agree or disagree that large energy and telecommunications companies should report individually? Please give reasons.**

**Agree/Disagree/Unsure**

- **Reflecting the scale of climate risk:** Large energy, telecommunications and other companies should report individually given the scale, criticality, and national importance of the infrastructure and services they manage. Individual reporting is more likely to provide detailed and transparent assessments of climate risks, vulnerabilities, and adaptation actions.
- **Improving accountability and transparency:** Individual reporting can strengthen accountability by ensuring major infrastructure operators clearly demonstrate how they are assessing and managing climate risks.

This is particularly important where service disruption could have widespread impacts on communities, local economies, and essential public services.

- **Clarifying thresholds and expectations:** Government should provide clear and transparent criteria for determining which organisations are expected to report individually versus collectively. This will help ensure consistency across sectors and provide certainty for reporting organisations and regulators.
- **Linking reporting to adaptation action:** Individual reporting should not focus solely on risk identification but also demonstrate clear adaptation actions, implementation plans, and progress over time. Reporting cycles should help track how organisations are improving resilience, addressing vulnerabilities, and adapting investment and operational decisions in response to climate risks.
- **Clarifying national use of reporting data:** Government should provide greater clarity on how information gathered through individual and collective reporting will be analysed and used nationally. This should include how findings will inform national resilience planning, infrastructure policy, cross-sector coordination, and the identification of systemic climate risks and adaptation gaps.

**Question 20: Do you agree or disagree that collective reports covering new sectors and those which have many small actors should be invited? Please give reasons and/or comments.**

#### **Agree/Disagree/Unsure**

- **Supporting proportionate participation:** Collective reporting can provide a proportionate and practical route for sectors with many small organisations or limited adaptation capacity to engage with climate risk assessment and adaptation planning. This can help broaden participation while reducing reporting burdens.
- **Building sector-wide adaptation capability:** It can support emerging sectors in developing a stronger understanding of climate risks, interdependencies, and adaptation needs over time. It can also help build organisational maturity and encourage greater engagement with adaptation planning across sectors that may otherwise lack the resources to report individually.
- **Providing system-level insights:** Collective reports can offer valuable information on sector-wide vulnerabilities, shared risks, and interconnected systems that may not be visible through individual reporting alone. This can help support national resilience planning and improve understanding of cross-sector dependencies.
- **Maintaining sufficient detail where risks are significant:** While collective reporting can be appropriate for sectors with many smaller actors, government should ensure that critical infrastructure operators and

organisations managing significant climate risks continue to provide sufficient detail on their individual adaptation actions and vulnerabilities where necessary.

- **Reducing duplication and aligning reporting requirements:** Collective reporting approaches should align with existing sectoral reporting and regulatory frameworks wherever possible to minimise duplication and reduce administrative burdens for participating organisations.
- **Co-developing reporting approaches with sectors:** Collective reporting arrangements should be developed collaboratively with sector representatives and reporting organisations to ensure approaches are practical, proportionate, and tailored to sector-specific structures and risks.

### Q21: Would a report by water and energy trade associations focusing on interdependencies between the two sectors be useful or not useful? Please give reasons

#### Useful/Not useful/Unsure

- **Understanding critical interdependencies:** Joint reporting on the interdependencies between the energy and water sectors could be useful given the strong operational links and shared climate vulnerabilities between them. It could help identify cascading risks and improve understanding of how climate impacts in one sector may affect the resilience of the other.
- **Aligning reporting timelines:** Joint interdependency reports will depend on trade associations receiving timely and sufficiently detailed inputs from their member organisations. Government will therefore need to ensure reporting timelines are aligned appropriately so trade bodies have adequate time to analyse sector reports, identify cross-sector risks, and develop meaningful collective outputs.
- **Resource and coordination challenges:** Developing meaningful interdependency reports across sectors may require significant coordination, analytical capacity, and technical expertise. Smaller trade associations or sectors with limited adaptation maturity may require additional support to undertake this effectively.
- **Clarifying national use of findings:** Government should explain how insights from joint reporting will inform national resilience planning, infrastructure policy, and cross-sector adaptation priorities.
- **Avoiding duplication with existing work:** Reporting should build on existing sectoral resilience and regulatory work where possible to minimise duplication and make best use of existing evidence and expertise.
- **Supporting wider cross-sector learning:** This approach could provide a useful model for future reporting on interdependencies across other critical sectors such as transport, telecommunications, health, and local resilience systems.

- **Aligning with emerging regional resilience structures:** Joint reporting should consider alignment with emerging regional boundaries and planning structures, such as Regional Energy Strategic Plans (RESPs), which operate across defined regional boundaries. Aligning approaches where possible could help ensure reporting is more useful for place-based resilience planning, cross-sector coordination, and regional adaptation decision-making.

#### Q22: What feedback would you welcome on ARP5 reports?

- **Clarity on national use of reports:** There should be clarity on how reports will be analysed and used nationally, including how findings will inform the Climate Change Risk Assessment, National Adaptation Programme, infrastructure planning, and wider resilience policy.
- **Proportionate and timely feedback:** Feedback should be timely, practical, and proportionate to the scale of reporting. Delayed feedback risks limiting its usefulness for organisational learning and decision-making.
- **Clear assessment against reporting expectations:** There should be structured feedback against clear criteria and expectations, including what has been done well and where further improvement is needed. Early clarity on “what good looks like” would help improve consistency and reporting quality.
- **Action-oriented recommendations:** Feedback should help organisations strengthen practical adaptation planning and implementation, rather than focusing solely on reporting quality. This could include identifying gaps in adaptation actions, governance arrangements, risk management approaches, and monitoring processes.
- **Benchmarking and peer learning:** It would also be good to have comparative insights, examples of good practice, and opportunities to learn from peers within and across sectors.
- **Insights on interdependencies and systemic risks:** Feedback should help organisations better understand cross-sector interdependencies, cascading risks, and shared vulnerabilities identified through the reporting process. This would support more coordinated resilience planning across sectors and governance levels.

#### Q23: Do you have any further comments on the overall proposed strategy for reporting in ARP5?

We would be grateful if, in addition to considering UK100’s response to the consultation, you would also explore opportunities for further engagement. We really appreciated the LAAP sessions by Defra to discuss this consultation with stakeholders. Please get in touch if you would like to know more or explore our response in more detail. We would also be happy to give evidence, convene a discussion with our member local authorities, and to discuss the themes within this inquiry and our response further.

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