

Consultation on Climate Change Reporting Requirements and Climate Impact Assessments for Public Bodies

Closing Date: 17th September 2024

Douglas City Council Response

Part 1: Climate Change Reporting Requirements

Amendments to the Climate Change (Public Bodies' Reporting Requirements) Regulations 2022

2022-2023 was the first reporting period for Isle of Man public bodies in relation to climate change. The information submitted by public bodies was analysed and the Summary Analysis Report (SAR) was created. The SAR provides an overview of climate action by public bodies and includes a list of recommendations for improving the accuracy and comprehensiveness of reporting in the future. Part 1 of this consultation relates to potential changes to the reporting process over the next 5 to 6 years.

Section 1: Categorisation of Public Bodies

In the first year of reporting (2022-2023) three categories of public bodies were created based on staff numbers, to try and create proportionality in reporting:

- Category A: 150+ employees
- Category B: More than 15 but fewer than 150 employees
- Category C: Up to 15 employees or inactive/dormant

Category A were asked to provide consumption (fuel and energy use) data in relation to both a baseline year and the reporting year. Category B were asked to provide consumption data for the reporting year only. Category C were not asked to provide consumption data.

The vast majority of Category A public bodies were not able to provide consumption data for a baseline year and, instead, elected to use the reporting year as their baseline year. This means that the information received for Category A and B public bodies was, for the most part, the same.

As a result, we are proposing that Categories A and B be combined, leaving two categories instead of three.

Categorisation on the basis of emissions (rather than staff numbers) is not being proposed at this time because:

- The data received in year one is not accurate enough
- Reporting is not just about emissions. It is important for all public bodies to take action and to embed the climate change duties into their governance and behaviour
- It is difficult to know where to set the thresholds
- Emissions may fluctuate from year to year and public bodies may not know what category they were in until they had established their emissions for that year
- We do not want to create a system that encourages shifting emissions to other public bodies
- The very smallest public bodies (Category C) were not asked to provide consumption data, so their emissions are not known

Combining the Categories A and B would result in two categories, as follows:

- Category 1 (A&B combined) more than 15 employees
 - Category 2 (previously Category C) Up to 15 employees or inactive/dormant
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Question 1

Do you feel that 15 employees is the correct level at which to separate the two categories?

- Yes
- No
- **Not Sure / No Preference**

Question 2

If Category A and B are combined, when should the submission date be for the new combined category?

[Currently, Category B public bodies must submit their reports no later than four months after the end of the reporting period and Category A no later than six months. The earlier we receive reports, the earlier we can analyse the results and provide feedback.]

- **As per the current Category A deadline, no later than six months after the end of the reporting period (i.e. by end of September)**
- As per the current Category B deadline, no later than four months after the end of the reporting period (i.e. by end of July)
- A different deadline – please specify below

If you selected different deadline, please explain:

Section 2 - Reporting Road Map

Presently, the emissions content of the climate change reports is limited to a small number of key Scope 1 and 2 emissions indicators. This does not provide a comprehensive picture of the carbon footprint of public bodies. This approach was chosen initially as data accessibility was expected to be a challenge.

This expectation was proven correct through the 2022-2023 reporting process. However, now that public bodies know what to expect and where they are missing data, work should have commenced to fill those data gaps. This means that reporting will become more accurate in future.

To ensure that public body climate change reporting continues to improve in terms of accuracy and comprehensiveness, we are proposing a number of changes to the reporting process over the coming years.

Here is a diagram which briefly explains those proposed changes. The following questions will ask for your opinions on each of the proposals.

Reporting Road Map

Cat A & B (combined)

- **Year 1 (22-23):** ✓
- **Year 2 (23-24):** same as year 1
- **Year 3 (24-25):** +
 - business travel
 - renewable energy generation
 - training stats
 - tarmac/asphalt
 - action plan progress
 - barriers & challenges
- **Year 4 (25-26):** +
 - policy review update
 - adaptation
 - report on targets
 - refrigeration & aircon
- **Year 5 (26-27):** +
 - scope 3 emissions

Cat C

- **Year 1 (22-23):** ✓
- **Year 2 (23-24):** same as year 1
- **Year 3 (24-25):** same as year 1

- **Year 4 (25-26):** +
 - consumption data reporting (vehicle and heating fuels, electricity use, etc) to enable emissions calculation
- **Year 5 (26-27):** same as year 4

Question 3

Please select the category of the public body you're responding on behalf of in order to be directed to the survey questions relevant to that category:

[Note that 'employees' means 'stationed employees' where relevant.]

- **Category A – 150+ employees**
- Category B – More than 15 but fewer than 150 employees
- Category C – Up to 15 employees
- Category C – Inactive/Dormant

Category A and B in Year 3 (2024-2025)

The following questions relate to proposals for reporting by Category A and B public bodies in Year 3 (2024-2025), which is the current reporting period.

Question 4 - Business Travel

Description

Data that will enable the calculation of emissions for:

- Private vehicle use for business purposes
- Other transport for business purposes e.g. flights

Why we are proposing this

The emissions from travel for business purposes (e.g. flights) can form a significant part of a public body's carbon footprint. We believe that including this information will improve the accuracy of reporting and encourage public bodies to reduce their business travel emissions. Most public bodies already track this information either for mileage claims or travel authorisation requests.

Please choose one of the following options:

- **Business travel should be reported for Year 3 (2024-2025)**
- Business travel should be reported, but later than Year 3
- Business travel should not be reported

- Not relevant to my public body

Please explain your answer:

DCC commenced reporting its business travel footprint since its baseline year of 2018/19. Given the small impact on our overall carbon footprint we would recommend doing this every 5 years.

Question 5 – Renewable Energy Generation

Description

Information about energy renewably generated by the public body.

Why we are proposing this

We have been asked by public bodies to include this. While our national electricity supply remains generated from fossil fuels, renewable generation contributes to emissions reductions.

Please choose one of the following options:

- **Renewable Energy Generation should be reported for Year 3 (2024-2025)**
- Renewable Energy Generation should be reported, but later than Year 3
- Renewable Energy Generation should not be reported
- Not relevant to my public body

Please explain your answer:

DCC thinks it's important to capture this information.

Question 6 – Training Statistics

Description

- Number of people within the public body who are certified Carbon Literate/have undertaken Carbon Literacy training
- Information about other relevant training

Why we are proposing this

The proportion of staff who have been trained to understand climate change and how to support transition to net zero in their roles is a key indicator of the priority public bodies assign to climate change.

The proportion of staff who have been trained to understand climate change and how to support transition to net zero in their roles is a key indicator of the priority public bodies assign to climate change. Statistics on Carbon Literacy provided by IOMG can be provided centrally.

Please choose one of the following options:

- **Training Statistics should be reported for Year 3 (2024-2025)**
- Training Statistics should be reported, but later than Year 3
- Training Statistics should not be reported

Please explain your answer:

It is important to highlight the existence of climate change awareness within all organisations, and to influence behaviours and decisions.

Question 7 – Tarmac/Asphalt Production

Description

Data to enable to calculation of emissions from the production of tarmac/asphalt e.g. tonnes produce per year, virgin/recycled.

Why we are proposing this

Absence of this information in the report was raised by a public body. These are high emission activities and therefore we feel they should be reported, to improve the accuracy and comprehensiveness of reporting overall.

Please choose one of the following options:

- Tarmac/Asphalt production should be reported for Year 3 (2024-2025)
- Tarmac/Asphalt production should be reported, but later than Year 3
- Tarmac/Asphalt production should not be reported
- **Not relevant to my public body**

Please explain your answer:

Question 8 – Barriers and Challenges

Description

Information about the barriers/challenges public bodies are facing in relation to compliance with the climate change duties and/or decarbonisation generally.

Why we are proposing this

Formal reporting of barrier and challenges will help us to understand and, where possible, help to address those issues. It will also help us to report on to the Council of Ministers and advise them accurately of the challenges being experienced by public bodies.

Please choose one of the following options:

- **Barriers and Challenges should be reported for Year 3 (2024-2025)**
- Barriers and Challenges should be reported, but later than Year 3
- Barriers and Challenges should not be reported

Please explain your answer:

Doing so will help address the significant barriers being experienced on the island and by DCC. DCC intends to submit a Barriers and Challenges paper as part of its 23/24 submission.

Category A and B in Year 4 (2025-2026)

The following questions relate to proposals for reporting by Category A and B public bodies in Year 4 (2025-2026).

Question 9 – Policy Review Update

Description

Information about the progress being made toward reviewing existing policies to ensure that they do not stand in the way of achieving our emissions reduction goals.

Why we are proposing this

Most of our policies were developed before the climate crisis was understood. In order to reach our climate goals, we must ensure that none of our existing policies are standing in the way. The Climate Change Plan includes an action for a government-wide policy review and the Climate Impact Assessment Regulations require assessments to be done in relation to some existing practices before the end of the Plan period (2027). To support ongoing delivery of the necessary, we believe that regular formal updates on progress would be beneficial.

Please choose one of the following options:

- **Policy review update should be reported for Year 4 (2025-2026)**
- Policy review update should be reported, but later than Year 4
- Policy review update should not be reported

Please explain your answer:

DCC agree with the current Roadmap.

Question 10 - Adaption

Description

Information about the actions taken by public bodies to adapt to our changing climate and the impacts of climate change.

Why we are proposing this

Our climate is already changing. Not matter how effective our mitigation efforts may be, there will still be changes we need to adapt to from rising global temperatures. Therefore, adaptation is a key part of our response to climate change and something that public bodies need to consider. A Risk and Opportunities Assessment is underway this year as part of a wider Adaptation Strategy for the Island which will better inform how public bodies can take action.

Please choose one of the following options:

- **Adaptation should be reported for Year 4 (2025-2026)**
- Adaptation should be reported, but later than Year 4
- Adaptation should not be reported

Please explain your answer:

DCC agree with the current Roadmap.

Question 11 – Report on Targets

Description

Information about emissions reduction targets set by public bodies and progress toward those targets.

Why we are proposing this

Setting clear targets helps drive performance, hence the ambitious national targets that have been set for the Island (35% reduction by 2030 and 45% reduction by 2035). What may constitute an appropriate target will depend on the nature of the public body itself. We would like the ability to request information on those public bodies' targets and progress towards them in the annual reports.

Please choose one of the following options:

- **Report on targets should be reported for Year 4 (2025-2026)**
- Report on targets should be reported, but later than Year 4
- Report on targets should not be reported

Please explain your answer:

DCC agree with the current Roadmap.

Question 12 – Refrigeration and air conditioning

Description

Data to enable the calculation of emissions from refrigeration and air conditioning.

Why we are proposing this

Refrigeration and air conditioning are a source of scope 1 (direct) emissions. Adding this to reporting will improve accuracy and comprehensiveness.

Please choose one of the following options:

- **Refrigeration and air conditioning should be reported for Year 4 (2025-2026)**
- Refrigeration and air conditioning should be reported, but later than Year 4
- Refrigeration and air conditioning should not be reported

Please explain your answer:

DCC agree with the current Roadmap.

Category A and B in Year 5 (2026-2027)

The following question relates to proposals for reporting by Category A and B public bodies in Year 5 (2026-2027).

Question 13 – Scope 3 emissions

Description

Information about the public bodies scope 3 emissions. Scope 3 emissions are indirect emissions such as goods and services supply chain emissions, contractors etc.

Why we are proposing this

Scope 3 emissions typically make up the largest part of an organisation's carbon footprint – larger than both scope 1 and 2 together. It is therefore important that we become more aware of and work to reduce scope 3 emissions. Scope 3 emissions reporting is becoming more and more common in the private sector. As public bodies we should lead the way or, at least, keep pace with the private sector. We believe that adding Scope 3 emissions to reporting will improve accuracy, comprehensiveness and encourage public bodies to understand and reduce their scope 3 emissions. Guidance on scope 3 emissions reporting would be provided.

Please choose one of the following options:

- **Scope 3 emissions should be reported for Year 5 (2026-2027)**
- Scope 3 emissions should be reported, but later than Year 5
- Scope 3 emissions should not be reported

Please explain your answer:

DCC agree with the current Roadmap. This tends to be the largest part of the public bodies' emissions.

Section 3 - Publication

Currently, the Climate Change Act 2021 requires all public bodies to publish their own annual climate change report.

We propose that it would be more efficient for all of the reports to be published centrally, in one location, by the Climate Change Transformation Team (CCTT).

Question 14

Which approach from below do you support?

- All reports should be published centrally by the Climate Change Transformation Team
- **Public bodies should continue to publish their own reports**
- No preference

Part 2: Section 4 – The CIA Tool

Question 15

Has your public body used the CIA Tool?

- **Yes**
- No

If yes, approximately how many times has the public body used the CIA Tool over the past 12 months? **10.**

Question 16

Have you read/accessed the Climate Impact Assessment User Guide?

- **Yes**
- No

Was there anything missing from the User Guide that you feel would be helpful? **No.**

Section 6 – The Thresholds

Question 17

If you have used the CIA Tool over the past year, at any point did your public body apply any of the thresholds set out in the Climate Impact Assessment Regulations 2023?

[Don't worry if you have not yet applied the thresholds, they do not come into effect until 1 January 2025 and you will be asked about them individually in the following questions.]

- Did not apply any thresholds
- **Applied the thresholds from the Regulations**
- Applied different thresholds (please specify below)

If you applied different thresholds, please describe them:

Currently applying the Regulations' threshold as a trial. Had previously used the Climate Impact Assessment Tool for:

- **Projects of over £1/2m;**
- **Commissioning a new service/ceasing a current one;**
- **New builds;**
- **Any projects aiming to reduce emissions;**
- **Any projects that may lead to a significant carbon emissions impact (up or down).**

Question 18

Approximately how often does your public body typically make proposals to which threshold a. would apply?

Threshold a. relates to political level approval for a proposal, as follows:

- a. 'the proposal requires approval by:
 - i. a Minister or political Member of that public body personally or
 - ii. a board, committee or other decision making group that includes a Minister or political Member of that public body'

Please note that a 'political Member' means a Departmental Member and does not mean a Commissioner.

- **Never**

- Very rarely (less than once per year)
- Up to 10 times per year
- Up to 50 times per year
- Up to 100 times per year
- More than 100 times per year
- I don't know

Do you have any comments on threshold a?

Please note that in Douglas City Council a Member is a Councillor and not a Commissioner.

Question 19

Approximately how often does your public body typically make proposals to which threshold b. would apply?

Threshold b. relates to Treasury approval or concurrence, as follows:

- b. 'the proposal requires Treasury approval or concurrence in accordance with Isle of Man Government Financial Regulations as issued by the Treasury from time to time'
- Never
- Very rarely (less than once per year)
- **Up to 10 times per year**
- Up to 50 times per year
- Up to 100 times per year
- More than 100 times per year
- I don't know

Do you have any comments on threshold b?

DCC is currently experiencing severe delays in getting approval of petitions to borrow. There is a concern that this may further delay the petition process. Please note that Douglas City Council apply for various approvals from Government under the Local Government Act (1985) which may be referred to Treasury.

Question 20

Approximately how often does your public body typically make proposals to which threshold c. would apply?

Threshold c. is a financial limit, as follows:

- c. 'the proposal requires, or creates changes to:
 - i. spending
 - ii. allocation of funding or
 - iii. annual revenue

amounting to at least £100,000'

- Never
- Very rarely (less than once per year)
- Up to 10 times per year
- **Up to 50 times per year**
- Up to 100 times per year
- More than 100 times per year
- I don't know

Do you have any comments on threshold c?

It is too low. DCC suggests £500,000. It should also be index-linked to CPI so that it increases in January each year in line with the IOM Consumer Prices Index of the previous October.

Question 21

How often to do you think that decision makers within your public body may request a Climate Impact Assessment, where the other thresholds do not apply?

Threshold d. enables a decision maker to request a Climate Impact Assessment where none of the other thresholds are met, as follows:

- d. 'the person or body responsible for approving the proposal requests a climate impact assessment.'
- Never
- Very rarely
- **Sometimes**
- Often
- I don't know

Do you have any comments on threshold d?

Question 22

Would you support the regulations being amended to provide public bodies with discretion NOT to prepare a Climate Impact Assessment, even when a threshold is relevant, on the condition that they record the reason for exercising such discretion?

- Yes
- No
- I don't know

Do you have any further comments on the potential addition of a discretionary provision being added to the regulations?

As long as the decisions are monitored to guard against abuse.

Question 23

Are there any specific types of proposal that you believe should be excluded from the requirement for a mandatory Climate Impact Assessment?

- Yes
- No
- I don't know

If you answered 'Yes' please describe the types of proposal you believe should be excluded and why:

IT projects as they have negligible climate impact. Maintenance of existing assets.

Question 24

Are there any types of proposal that are not covered by the current thresholds but which you feel should be?

- Yes
- No
- I don't know

If you answered 'Yes' please describe the types of proposal you believe should be included and why:

Question 25

If discretion is introduced into the process, it will be important that this is not overused or misused. To support this, monitoring of the use of Climate Impact Assessment could be included in annual climate change reporting. For example, the number of CIAs completed over the reporting period and, if discretion were introduced, the number of times discretion was exercised. This could be supported by an online system, which collected the data for you. Do you support this approach?

- Support this approach
- **Support this approach, but only if data collected automatically by an online system**
- Do not support this approach
- I don't know/no preference

Please explain your answer:

The Council support discretion as long as it is monitored and guarded against abuse.

Question 26

If you support the introduction of discretion into the CIA process but do not support reporting on the use of that discretion, do you have any suggestions for how overuse or misuse of the discretionary provisions could be achieved?

N/A