

Defra consultation: Strategy for the Fifth Round of Climate Adaptation Reporting

IMechE Response

May 2026

Question 1: Would you like your response to this consultation to be confidential in the event of an access to information request? (required)

No.

Question 2: Do you agree or disagree to the proposed objectives and principles for ARP5?

Agree

The Institution of Mechanical Engineers (IMechE) supports the emphasis on organisational maturity in climate risk management. Alignment with the UK CCRA is essential, and the principle of complementing existing reporting regimes is welcomed, as this will help minimise duplication and streamline processes.

Question 3: Do you agree 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?

Agree

Voluntary update can be effective where a precedence has been set, learning curves climbed, and an investment in knowledge acquisition and methodology made through participation in previous rounds. It can also work in sectors or sub-sectors where guidance, peer learning, professional norms, and a participation culture are strong, but targeted mandating is appropriate for persistent gaps in sector participation and non-reporting entities responsible for critical infrastructure with long asset life and systemic risk implications.

Question 4: Do you agree with the proposed tests to determine who would receive a direction to report?

Agree

Targeting first time reporters, persistent gaps in sector participation, and critical national infrastructure (CNI), makes sense and, in the case of CNI, aligns with IMechE analysis identifying infrastructure systems as highly interdependent and vulnerable to cascading climate risks. Individual reporting is particularly important for large asset owners where collective reports risk obscuring organisational and asset-level vulnerabilities as well as credible adaptation pathways

Question 5: Are there any other criteria that should be used to target directions?

No comment

Question 6: Do you agree or disagree that additional incentives for voluntary reporting are needed?

Agree

Visible recognition mechanisms (e.g. charter marks) may possibly help encourage participation, but publishing an invitee list is unlikely to have any significant effect and a 'naming and shaming' approach could be counterproductive. Any incentives must provide a real tangible benefit to organisations, such as, for example, opportunities to inform decision makers and influence policy development that could help with capacity building and adaptation actions; tax relief on reporting costs.

Question 7: Do you agree or disagree that reporting should be expanded to include strategic authorities?

Agree

IMechE stresses that, in addition to local place-based approaches, climate adaptation and resilience requires systems thinking beyond individual assets, organisations, and local authorities. Regional oversight is essential for managing climate impacts such as flooding, heat stress, and coastal change, at scale and the risks they pose to regional economic growth ambitions and delivery plans.

Question 8: Should reporting by strategic authorities be mandatory or voluntary?

Mandatory – the strategic nature of strategic authorities, along with the experience to-date of the effectiveness of voluntary report, strongly suggests a need for a mandatory approach.

However, IMechE recommends that a mandatory approach to reporting should be accompanied by funded support and access to supporting resources, such as engineering-based guidance, tools and methodologies, to avoid variability in report quality.

Question 9: What support is needed for successful reporting by strategic authorities?

Strategic authorities would benefit from clear, engineering and science led guidance on how to translate climate projections into service-level, asset-level and organisational-level climate risks. This should be supported by standardised future climate projections at sector level to promote consistency and comparability.

In addition, access to shared knowledge, methodologies, analytical tools, peer learning opportunities, and specialist climate risk management expertise will be essential to support effective and proportionate reporting.

Question 10: Do you have any comments or suggestions regarding the proposed additional scope changes? (optional)

The built environment sector currently lags behind others in addressing and reporting on climate resilience. This is partly due to its fragmented structure, with a long tail of smaller organisations rather than a concentration of large entities, as seen in infrastructure sectors. The focus within the ARP on organisations delivering important public functions may therefore exclude significant parts of the built environment.

To ensure adequate protection for vulnerable populations, there would be merit in expanding the scope to capture key built environment providers. While mandatory reporting for local and municipal authorities, as well as existing NHS reporting, will capture some assets (e.g. healthcare facilities), additional consideration could be given to:

- Large social housing providers
- Student accommodation operators
- Educational estate owners and operators

Inclusion could be achieved through targeted invitations to report or proportionate reporting requirements. For example, organisations such as Unite Students (~73,000 student beds) and Clarion Housing Group (~360,000 residents in social housing) represent substantial exposure and could provide valuable insights into sector-wide climate risks and resilience measures.

In the Food and Agriculture areas, IMechE recommends inviting collective reporting for retailers and supply chain actors, for example possibly through trade associations such as the British Retail Consortium, British Independent Retailers Association, Cold Chain Federation and/or Food and Drink Supply Chain Federation, as these are critical to ensuring the resilience of UK food security.

Question 11: Do you agree or disagree with new sector-neutral guidance on additional aspects of climate risk management?

Agree

Inclusion of adaptation pathways, interdependency and cascading risks, and high-impact low-likelihood events, are all very welcome.

Question 12: Do you agree or disagree that sector-specific guidance would be useful for ARP5?

Strongly agree

Generic guidance alone is insufficient to address sector-specific engineering constraints and asset management.

Question 13: Would your organisations agree or disagree to participating in the co-development of sector-specific guidance with government?

Agree

Reflecting in best practice in engineering standard setting, facilitating knowledge transfer, strengthening industry ownership, and improving quality are at the heart of the Institution.

Question 14: Do you agree or disagree that ARP reporting is a valuable addition to corporate climate disclosures and/or existing sector-specific regulatory obligations?

Agree

The ARP requirements support a wider understanding of climate risk management and preparedness in a given organisation beyond those of corporate disclosures (which are primarily focussed on financial aspects and mitigation actions, rather than adaptation) and sector-specific regulatory obligations (which by their nature do not provide consistency from sector to sector). ARP reporting also ensures that government obtains the specific information it needs to comply with the obligations of the CCA 2008 in a timely manner and format that is consistent across sectors.

Question 15: Do you agree or disagree that ARP reporting is a valuable addition to existing sector-specific regulatory obligations?

Agree

ARP reporting also ensures that government obtains the specific information it needs to comply with the obligations of the CCA 2008 in a timely manner and format that is consistent across sectors.

Question 16: (optional) In what further ways can Defra reduce duplication between ARP and other climate risk reporting your organisation is subject to?

No response

Question 17: 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?

Unsure.

Shorter deadlines may be workable where asset-level risk assessments already exist, but should not compromise the engineering integrity of adaptation planning.

Question 18: How much less time than the standard 3-year window should economically regulated companies be given to report?

No comment.

Question 19: Do you agree or disagree that large energy and telecommunications companies should report individually?

Agree.

The energy sector and telecommunications sectors are highly critical to the functioning, security and wellbeing of the nation and the large companies in them should report individually. Indeed, large companies in other highly critical sectors, such as food and digital, should also be required to report individually.

Question 20: Do you agree or disagree that collective reports covering new sectors and those which have many small actors should be invited?

Agree in the case of small actors.

Question 21: Would a report by water and energy trade associations focusing on interdependencies between the two sectors be useful or not useful?

Useful

If they are amenable to collaborating in the proposed pilot, such a report involving these two sectors would be very useful as understanding interdependencies will be critical in avoiding cascading failures under climate stress.

Question 22: What feedback would you welcome on ARP5 reports?

No comment.

Question 23: Do you have any further comments on the overall proposed strategy for reporting in ARP5?

No.