



Department
for Environment,
Food & Rural Affairs

Strategy for the Fifth Round of Climate Adaptation Reporting

Consultation

March 2026

We are responsible for improving and protecting the environment. We aim to grow a green economy and sustain thriving rural communities. We also support our world-leading food, farming and fishing industries.

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Foreword

Climate change is one of the most challenging issues we face in this country and across the world, and this government is committed not only to reducing its causes but also dealing with its effects. As we continue to work towards net zero carbon emissions – restoring peatland, planting thousands of hectares of trees, improving the way we heat our homes and power our industries – we know that a certain amount of climate change is already locked in and we must adapt to it now and in the years to come. We must prepare for hotter, drier summers and warmer, wetter winters. For more extreme weather events, flooding and wildfires. For the risks that these will pose to our economy, society and environment.

The Office for Budget Responsibility suggests that unchecked climate change could impact UK economic output by between 3% and 5% of GDP by 2075. In 2025 we experienced our warmest UK summer on record, and some of the driest months over the first half of the year, contrasting with our wettest period between 2022 and 2024. This is not expected to be an anomaly – by 2050 the average UK winter is projected to be around 1.2 degrees warmer than it was on average between 1981 and 2000, and 5% wetter. Meanwhile, the average UK summer in 2050 is projected to be around 1.6 degrees warmer, while an increase in both the intensity of rainfall, and the number of wet days, will contribute to sea-levels around 10-30cm higher than in 1981-2000.

To manage the risks that these changes bring, this government is already investing a record of at least £10.5 billion in flood defences and £15 million in applied climate adaptation research, as well as strengthening long-term climate adaptation action by setting stronger objectives based on a common planning assumptions – ensuring policies align with our ambition.

A well-adapted UK cannot be achieved through central government action alone. Private organisations, regulators, local authorities, arm's length's bodies and others play important roles in providing the infrastructure and services on which we all rely. Since its first round began in 2009, climate adaptation reporting under the Adaptation Reporting Power has helped ensure that important public and private sector organisations take a structured approach to managing climate risk and share information about their preparedness with government and the public. The total number of organisations and sectors involved in reporting has increased with every subsequent round and every report, whether from a new or returning organisation, helps build the picture of adaptation across the UK and support organisations to build their capability on climate risk management.

As we approach round 5, we are keen to hear your views on two main developments. Firstly, the targeted use of the legal power to compel reporting where there are gaps. Secondly, the inclusion of strategic authorities, following the pilot of local authority reporting in round 4. This would be accompanied by further guidance and support and a return to the standard reporting window of 3 years (from 1 year in ARP4).

Your feedback will be invaluable as we look towards the publication of our final round 5 strategy. I encourage all your views, whether you are new to the process, an experienced reporting body, or any other stakeholder, and thank you in advance for sharing them with us.

Emma Hardy MP

Parliamentary Under-Secretary of State (Minister for Water and Flooding)

Introduction

Purpose of the consultation

To seek views on the strategy for the fifth round of reporting under the Adaptation Reporting Power (ARP5), to be laid before Parliament in 2026.

What are we proposing?

The Adaptation Reporting Power was introduced under the Climate Change Act 2008 (“the CCA 2008”). It gives government the power to direct infrastructure operators and certain public bodies to report on how they are addressing current and future climate impacts. Under the five-yearly cycle of the CCA 2008, the government is required to set out and consult on its strategy for each round of reporting. This strategy is required to be laid in Parliament before or alongside the National Adaptation Programme (NAP). The strategy for ARP5 will be laid separately from the next NAP (due in 2028) in the summer of 2026 because the timing of the ARP cycle was changed in the previous round so that reports can provide evidence for the nearest five-yearly UK Climate Change Risk Assessment (CCRA).

We are proposing two key developments for ARP5:

- 1. A limited expansion in reporting bodies.** Building on the local authority reporting pilot in the previous round, we propose to expand the scope of ARP5 to include strategic (i.e. combined) authorities.
- 2. A limited and targeted approach to mandating reporting.** We propose to use the legal power sparingly, to target non-reporting and gaps in coverage, with enhanced guidance to improve report quality.

Responding to the consultation

A wide range of stakeholders have a role in helping us to develop the final strategy for the fifth round of climate adaptation reporting. This consultation starts on 25th March and closes on 20th May. Responses received after the consultation closing date and time will not be analysed. We strongly encourage responses via Citizen Space, an online consultation tool. Consultations receive a high level of interest across many sectors and using the online tool assists our analysis of responses, enabling more efficient and effective consideration of issues. However, responses can also be sent by email or post.

If responding by email or post, please state:

- your name
- your email address

- your organisation (if applicable)
- the consultation title

Enquiries and responses should be sent:

- by email to climate@defra.gov.uk including whether you need a hard copy of the consultation

Confidentiality and data protection

When this consultation ends, we will publish a summary of responses on our website at: <http://www.gov.uk/defra>. This summary will include a list of organisations that responded but not personal names, addresses or other contact details.

How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found here:

<https://www.gov.uk/government/publications/defras-consultations-and-call-for-evidence-exercises-privacy-notice>

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data, with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

Information in response to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances.

The question below asks whether you would like your response to be confidential. The answer you give will help us respond to any access for information request in relation to this consultation. If you respond 'Yes' in response to the question, you are asked to state clearly what information you would like to be kept confidential and explain your reasons for confidentiality. Your explanation of your reasons for requesting confidentiality would help us balance these obligations for disclosure against any obligation of confidentiality.

We will take your reasons into account if someone asks for this information under the FOIA. But, because of the law, we cannot promise that we will always be able to keep those details confidential. Please note, if your computer automatically includes a confidentiality disclaimer, this will not count as a confidentiality request.

If you respond 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to

the public, but we won't make your personal name and private contact details publicly available.

After the consultation

When this consultation ends, we will summarise the responses and place this summary on our website at: <http://www.gov.uk/defra>. This summary will include a list of organisations that responded but not personal names, addresses or other contact details.

We will use the consultation responses to inform the final published strategy for ARP5, which will be published in 2026.

Other information

This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and be found at: [Microsoft Word - Consultation Principles \(1\).docx \(publishing.service.gov.uk\)](#)

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

Please select one option only

Yes/No

If you answered 'Yes' please give your reason(s).

Consultation

Background

Section 62 of the CCA 2008 gives the Secretary of State the power to direct reporting organisations (those with functions of a public nature or statutory undertakers) to produce reports setting out:

- the current and future projected impacts of climate change on their organisation
- proposals for adapting to climate change
- an assessment of progress towards implementing the policies and proposals set out in previous reports.

This is known as the Adaptation Reporting Power (ARP). It was introduced to help ensure that organisations with important public functions outside central government are taking appropriate action to adapt to the current and future impacts of climate change. It helps do this directly, by necessitating the assessment of risks and planning of actions by reporting organisations, and indirectly, by raising awareness, building capacity in organisations, and making examples of good practice publicly available. Under the CCA 2008, the government's proposed strategy for exercising the ARP is subject to public consultation.

The strategy for the fifth round of ARP (ARP5) will, following this consultation, constitute the "report on exercise of power to give directions" required under section 65 of the CCA 2008.

Summary of previous rounds

A comprehensive review of previous ARP rounds was conducted for Defra by Ipsos and can be found on the Citizen Space landing page. It sets out in detail the timelines, requirements and participants in each of the 4 previous rounds, as well as a comparison of ARP with other climate adaptation reporting requirements. It concludes that ARP has supported increasingly comprehensive risk assessments and adaptation planning among reporting organisations over time, and that whilst opportunities exist to improve its take-up and alignment with other regulatory requirements, ARP remains unique among climate adaptation reporting regimes as it allows for a broad assessment of how climate change will affect an organisation's functions, and how they will need to adapt to any impacts.

Round 4 evaluation

A value for money evaluation of the fourth round of ARP reporting (ARP4) was conducted for Defra by ICF and Winning Moves and is available on the Citizen Space landing page. It found strong evidence to suggest that ARP4 delivered value for money, assessed using a 4E's framework (Economy; Efficiency; Effectiveness; Cost-Effectiveness) using evidence gathered through surveys of reporting organisations and government officials.

Objectives and principles for ARP5

Building on previous rounds, to further improve the usefulness of ARP reporting to both reporting organisations and government, we propose to change the objectives and principles for ARP5 to emphasise:

- its role in supporting organisations to make progress in the management of climate risk whatever their starting point – supported by guidance
- the need to close some gaps in the evidence base to which the reports contribute
- its complimentary role in relation to other regulatory climate adaptation reporting.

The changes are not wholesale; they aim to represent a logical progression from round 4 to ensure that the process remains as relevant and efficient as possible. We are proposing:

Objectives:

1. To support organisational maturity in climate risk management, whether reporting organisations are new to the process or returning.
2. To improve the evidence base on the climate preparedness of key sectors – in line with the government's adaptation planning assumptions(s) for climate adaptation – to inform the fifth CCRA and NAP and ongoing policy making.

Principles:

1. Reporting should reflect proportionally the systems, risks and climate scenarios(s) set out in the fourth UK CCRA.
2. Reporting should amplify other regulatory climate adaptation reporting, whilst minimising duplication and streamlining processes.

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

Agree/Disagree/Unsure

Please explain your reasons (optional)

free text

Timing of reporting

The previous round of reporting was truncated in order to realign report submission with the timeline for production of the Climate Change Committee's independent advice to government on UK Climate Risk. As set out in the previous strategy, ARP5 will now return to a five-yearly cycle. We anticipate opening the reporting window towards the end of 2026 and closing it at the end of 2029, with guidance issued during 2026 following the publication of the ARP5 strategy on which we are now consulting. This should allow organisations sufficient time to refresh their risk assessments and report in full (see 'Approach to ARP5 Guidance' below for more detail).

The requirement to report

Section 62 of the CCA 2008 states that:

1. *The Secretary of State may direct a reporting authority to prepare a report containing any of the following:*
 - a. *an assessment of the current and predicted impact of climate change in relation to the authority's functions*
 - b. *a statement of the authority's proposals and policies for adapting to climate change in the exercise of its functions and the time-scales for introducing those proposals and policies*
 - c. *an assessment of the progress made by the authority towards implementing the proposals and policies set out in previous reports*
2. *The Secretary of State may direct two or more reporting authorities to prepare a joint report.*
3. *The Secretary of State may give directions about:*
 - a. *the time within which a report must be prepared*
 - b. *its content, and may, in particular, require it to cover a particular geographical area*
4. *This section does not apply to devolved functions.*

Section 70 states that:

1. *A 'reporting authority' is 'a person or body with functions of a public nature', 'a person who is or is deemed to be a statutory undertaker' under the Town and Country Planning Act 1990 (or the relevant planning legislation in Scotland and Northern Ireland).*
2. *Ministers of the Crown, the Houses of Parliament, devolved authorities and devolved legislatures are specifically excluded from the scope.*

Whilst these provisions give the Secretary of State the power to mandate reporting, this has not been used since the first round in 2010. The previous three rounds have been built upon a collaborative relationship between government and industry, whereby eligible organisations were invited to report voluntarily and the format and content of reports could be flexed to meet their needs.

The CCC have expressed the opinion that mandatory reporting could improve participation, however the evidence is not clear-cut. There was a dip in the number of reports received in round 2, which is at least partly attributable to the shift from mandatory to voluntary reporting, and report numbers remained broadly level in rounds 2 and 3. This was followed however by a significant uptick in reports received in round 4. Excluding the local authority pilot, round 4 had a response rate of over 80%, with 40% more reports submitted than in round 3 (83 compared to 59), suggesting that mandation is not the only factor in driving reporting.

The number of organisations reporting collectively through a trade association has also grown significantly over the 4 rounds, from 23 in round 1 to 139 in round 4.¹ This will be discussed further in the 'Collective Reporting' section on page 20, however it should be noted that trade associations are not eligible to receive directions to report and are therefore already ruled out of mandatory reporting.

Around a quarter of all reporting organisations have reported in all four rounds of ARP and may consider it 'business as usual' to continue whether mandatory or not. Nevertheless, many of these organisations received a mandatory direction to report in round 1, suggesting that this acts as a useful first step in securing ongoing voluntary reporting thereafter.

However, despite the increase in reporting in ARP4, some notable gaps remain in sectors including transport, food, energy and telecommunications, some of which are persistent. Annex 4 of the Ipsos report sets out the organisations that have reported over the 4 rounds.

Another hypothesis is that mandatory reporting would improve report quality, but evidence does not exist to confirm this. Ipsos concluded that mandatory reporting would not necessarily address inconsistencies in reporting quality, which is highly dependent on process design and organisational capability². They undertook a detailed review of 4 organisations' rounds 1 to 4 reports, which showed that most took a consistent approach to reporting across the rounds and made gradual improvements in addressing the

¹ Adaptation Reporting Power and Wider Reporting Landscape Synthesis, p32, table 4.4, June 2025

² Adaptation Reporting Power and Wider Reporting Landscape Synthesis, p78, June 2025

requirements over time. Other relevant factors affecting report quality include the requirements (including whether a light touch update or a full report has been requested), the amount of government and peer-to-peer engagement that is available in each round, and the depth and clarity of reporting guidance. Reporting requirements and guidance are explored in more detail in 'Approach to ARP5 guidance' section below.

Mandatory requirements place a regulatory burden on organisations that must be balanced against the costs and benefits of process. The evaluation of ARP4 found the median cost for reporting bodies to be £6,400. Costs and benefits are explored in more detail in the 'Costs and benefits of reporting' section below.

We consulted in 2023 on the issue of mandatory reporting, ahead of ARP4. There were 68 responses to the question, 'Should ARP reporting remain voluntary or be made mandatory in round four?' with no overall majority on either side. The largest number of responses (33, representing 48.5% of the total) were in favour of mandatory reporting, either outright or in principle. 16 (23.5%) responses were in favour of voluntary reporting and 19 (28%) were either undecided or did not take a view. A large proportion of those in favour of mandatory reporting (27% of the 33) caveated their responses, citing practical challenges for government and industry in implementing it in the shortened timeframe for ARP4, but supported it for ARP5. Of the 39 existing reporting bodies that responded to the question, 12 favoured voluntary reporting, 14 mandatory and the remaining 13 suggested a mixed approach, were undecided or did not take a view.

Taking the evidence on value for money, prior take-up of reporting and stakeholder views into account, we propose to take a targeted approach to mandatory reporting in ARP5. This is one which recognises the success of voluntary reporting with most of the organisations that have come into this process since 2010, whilst acknowledging that for some, an invitation has not been incentive enough to report. Directions would be issued to certain organisations based on the criteria set out below.

Criteria for issuing directions

In order to ensure that directions would only be targeted at non-reporting and gaps in coverage, and issued only where necessary, we propose that organisations must first meet the following test for a direction to be issued:

- the organisation must be in scope of the power as specified by section 70 of the CCA 2008 – that is, it must be a statutory undertaker or have functions of a public nature
- the organisation must not be subject to any of the exclusions set out in section 70 of the CCA 2008.

Based on whether an organisation meets those tests, we have developed criteria for issuing directions.

For organisations other than local authorities (including strategic authorities) directions could be issued if at least one of the following apply:

- the organisation was invited to report in round 4 and did not do so
- the organisation would be reporting for the first time
- the organisation (or its predecessors) represent critical national infrastructure and reported individually in round 1 but have not done so since.

Due to our proposal to expand the scope of reporting to include Strategic Authorities, directions may also be issued to these organisations, including those that reported in round 4. If you wish to comment on this, information and relevant questions are available on page 16.

Question 3: 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?

Agree/Disagree/Unsure

Please give reasons (optional):

Free text

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

Agree/Disagree/Unsure

Please give reasons (optional)

Free text

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

Yes/no/don't know

If yes, please give details (optional)

Free text

Additional incentives for voluntary reporting

In order to help maintain high levels of voluntary reporting among existing reporting organisations, Defra could explore additional incentives. These could include but may not be limited to:

- a form of ARP 'charter mark' for use on reporting organisations' websites and literature
- publication of a list of organisations that have been invited to report in ARP5
- publication of a list of organisations that were invited to report in ARP5 and did not do so.

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

Agree/Disagree/Unsure

Please give reasons and/or suggestions for incentives (optional)

Free text

Scope

We are proposing one key expansion of the scope of organisations to include in ARP5.

In addition to all the existing sectors, we propose to build on the pilot of reporting by local authorities that was undertaken in round 4. In the pilot, 16 reports from local authorities and 2 reports from mayoral combined authorities were received. (Combined authorities (both mayoral and non-mayoral) are existing partnerships of local councils collaborating on devolved issues like transport and economic development.)

The pilot was evaluated as part of the ARP4 evaluation, with the following conclusions:

- The Local Authority Pilot formed the largest single sector proportion of respondents in this round of reporting (23%) with 18 reports submitted
- Despite this, 57% of invited Local Authorities declined or failed to report (24 of 42 invited) – with many citing significant financial/resource constraints as the reason
- Local Authorities generally reported lower costs than other sectors, with a median cost of £5.5k for them vs £7.5k for the other sectors, as well as clear benefits regarding increased awareness, governance integration, stronger ambitions and identifying or refining adaptation options

- On the other hand, there were challenges regarding the translation of climate scenarios into service-level risks, and the consistency and comparability of reporting.

We propose now to build on the pilot by expanding the scope of ARP5 to include strategic authorities. Strategic authorities are a new, overarching legal category **in England only** that includes combined authorities, combined county authorities, and the Greater London Authority, designated to oversee a broader range of devolved powers and functions, often with an elected mayor. We consider this to be a proportionate approach to building adaptation capacity and capability in the local government sector, aligning with the regional devolution, growth and nature recovery agendas while local government reform is underway.

Strategic authorities act as powerful convenors across their regional geographies, bringing together not only their constituent local authorities but other key stakeholders such as health, transport and utilities providers, in pursuit of their economic and social aims. Climate change poses significant risks to their growth ambitions and delivery plans, as well as other functions which come together at the regional level such as fire and rescue services, which would benefit from the leadership and focus that ARP reporting brings.

We envisage that strategic authorities would work together with their constituent local authorities and other stakeholders to report on the risks the climate poses to their regional growth ambitions and statutory functions. We propose to develop a framework of support for strategic authorities to help them complete their reports and build climate adaptation capacity in their regions by the end of 2029, building on the ARP4 pilot and amplifying the existing expertise and resources of frontrunners in the sector. This will help to build capacity and support greater engagement with climate adaptation at both the strategic and local authority level.

In the event that directions are issued to strategic authorities, 'new burdens' funding is payable. Defra is exploring ways in which this may be funded from its departmental budget and will discuss this further with relevant stakeholders.

Individual local councils would not be explicitly included in the scope of ARP5 but may report voluntarily should they wish. We would seek to encourage this particularly in areas not covered by a strategic authority.

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

Agree/Disagree/Unsure

Please give reasons (optional)

Free text

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

Mandatory/Voluntary/Don't know

Please give reasons (optional)

Free text

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

Free text

Outside of the local government sector, we propose the following **changes** to reporting organisations compared to round 4. Proposals are based on initial stakeholder engagement and we welcome views. See also 'Collective reporting' below. The full list of organisations who reported in round 4 is at Annex A.

Energy

We will explore the inclusion of additional aspects of the energy system in ARP5, such as midstream gas operators (terminal and supply facilities) and the new National Energy System Operator in view of its responsibilities for the planning and resilience of the whole energy system.

In line with the criteria set out above, we propose that the electricity generation companies identified to report in round 1 (or their successors) should report individually rather than collectively. This will ensure that large energy generators provide full, in-depth reports on their climate adaptation strategies. Collective reporting often leads to more intricate details being omitted, which are especially important for companies with a large role in their respective sectors. We will further explore appropriate reporting by the renewables sector and would like to test the potential for relevant energy trade bodies to report jointly and collectively on the sector's interdependencies (see 'Collective reporting' below).

Water

Ofwat will be replaced by a single regulator responsible for the whole water system in England and Wales. We will include this new organisation in reporting. Former water regulators will no longer need to include water regulatory activities in their reporting. We would like to test the potential for water trade body Water UK to report jointly and collectively on the sector's interdependencies (see 'Collective reporting' below).

Transport

Great British Railways (GBR) is set to be established to bring train and track operators together in one organisation and we anticipate their report as part of ARP5 once set up in 2027. Two Train Operating Companies (TOCs) reported voluntarily in ARP4, acting as a limited pilot of reporting in this rail sub-sector. In view of the setting up of GBR and the interim requirement by DfT for its TOCs to submit Weather Resilience and Climate Change Adaptation strategies, we will not extend reporting to individual TOCs in ARP5. We will continue to welcome voluntary reports from freight companies and open access TOCs outside of GBR.

Land Management

We propose that existing reporting organisations with significant land holdings should report on their land management activities as well as their other functions.

In addition to this, we will invite eligible³ members of the National Estate for Nature (NEN) group to report if they wish. We acknowledge that members of the NEN are at different starting points, and that some are involved in other reporting regimes. In accordance with the proposed ARP5 objectives and principles, Defra will support reporting organisations with guidance that takes into account different levels of maturity, resources, and reporting activity in the land management sector.

With representatives of the sector, we will explore ways in which Internal Drainage Boards may participate in reporting in this round.

Health and social care

In view of the disbanding of NHS England, we will explore appropriate reporting by organisations in the health sector as well as ways in which reporting by strategic authorities may include health and social care perspectives.

Telecommunications

In line with the criteria set out above, we propose that the largest mobile and broadband network operators should report individually rather than collectively. This will build on ARP4, when large individual operators provided adaptation information to Ofcom, and one submitted a full ARP report.

³ Ministers of the Crown, the Houses of Parliament, devolved authorities and devolved legislatures are specifically excluded from the scope (section 70 of the Climate Change Act 2008)

Space

A new organisation is being formed within the Department for Science, Innovation and Technology for space strategy, policy and delivery, subsuming the UK Space Agency. The new organisation would not be eligible to receive a direction to report but may report voluntarily.

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

Free text

Approach to ARP5 guidance

We are aiming to publish statutory guidance for ARP5 during 2026. Best practice in climate change adaptation management and reporting has not changed significantly since ARP4, therefore we do not anticipate substantial changes to the overarching guidance for risk assessment and action planning contained in the [published ARP4 guidance](#), which aligns with the international standard ISO14090. This will help promote consistency of reporting and contribute to ongoing capability building in reporting organisations.

Given the 3-year reporting window available in ARP5, we propose that all returning reporting organisations should refresh their risk assessments and action plans, as well as providing a comprehensive update on progress. As for previous rounds, Defra proposes to produce generic templates to help structure reports, risk assessments and action plans, and provide regular opportunities for peer-to-peer learning and capability building during the reporting window.

In order to support increasing organisational maturity in climate adaptation management (proposed ARP5 Objective 1) we propose two further developments for the ARP5 guidance:

- the inclusion of optional, sector-neutral, additional guidance and signposting on ways in which organisations can progress in their organisational maturity, for example
 - conducting adaptive capability maturity assessments
 - progressing in the management and reporting of interdependencies and cascading risks
 - using adaptation pathways and theories of change
 - reporting on climate impact and adaptation costs
 - enhancing monitoring and evaluation
 - exploring climate data and projections in more depth
 - considering high impact, low likelihood events

- additional, non-statutory, sector-specific guidance, to be co-produced with the relevant lead government department and industry stakeholders.

Sector-specific guidance would help drive improvements in report quality and reporting consistency in individual sectors, based on a collaborative approach to its development between government and industry. Government and industry can together tailor the generic ARP5 templates and guidance to their sector's specific needs, including agreeing any appropriate risk classifications and the most appropriate climate scenarios for their sector to assess against (see more below on climate scenarios). We will also explore the potential to introduce some standard high-level metrics across and within sectors to help measure and compare adaptation progress.

Sector-specific guidance for strategic authorities would form part of the support package proposed above.

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

Agree/Disagree/Unsure

Please give your reasons and/or suggestions (optional):

Free text

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

Agree/Disagree/Unsure

Please give reasons (optional)

Free text

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

Agree/Disagree/Unsure

Please give reasons (optional)

Free text

Other reporting regimes

The work conducted by Ipsos to compare ARP with other reporting regimes highlights in detail the differences and overlaps that exist between ARP and other major adaptation

reporting requirements. We are keen to reduce duplication and improve the alignment of ARP with these other regimes, whilst recognising that they have different scopes, timetables, requirements, and audiences.

Around half of private sector ARP organisations are currently subject to mandatory climate risk disclosures in their corporate annual reports (known as TCFD disclosures). In the public sector, whilst all the ALBs who report under ARP are implicated in some way in annual climate risk disclosures either directly or by their parent departments, government entities have only been required to comply with the full range of climate risk disclosure requirements since the current financial year (2025/26). Ipsos and respondents to the ARP4 consultation have pointed out that ARP reports tend to provide a broader picture of an organisation's climate risk management and readiness, because corporate disclosures centre on financially material risks, and often focus more heavily on carbon emissions than climate adaptation.

In the ARP4 consultation, 68 respondents answered the question, could your TCFD disclosures effectively replace ARP in round 4 or beyond? 62 (91%) said TCFD-aligned disclosures could not effectively replace ARP in round 4 or beyond and 8 (9%) said they could. This should be interpreted with some care as it includes respondents who were not actually subject to TCFD disclosures (44% of all 76 consultation respondents), as well as those who were.

Climate disclosure requirements on both the public and private sector remain subject to change, as new international standards are endorsed and progressively implemented in the UK. ARP provides valuable continuity as a means by which government can ensure that the providers of important infrastructure and services are periodically assessing their climate risks and progress on adaptation, and sufficient information is available to support local and national governments' assessments of preparedness (whereas corporate reporting is aimed primarily at investors).

The economic utilities regulators recognise the need for climate risk management in the requirements they impose. For example, regulated network companies are required to submit climate adaptation strategies as part of Ofgem's price control process, and water companies are required to produce Water Resource Management Plans, which necessitate the consideration of climate impacts on water supply and demand. However, government sees continued value in including water and energy network companies in the ARP process because it provides additional detail across a broader range of climate risks, more comprehensive plans for adaptation action and more detailed summaries of progress being made, as well as supporting regulatory requirements. We will discuss further with the economic regulators to ensure processes are aligned as much as possible.

Therefore, in support of our proposed ARP5 principle that reporting should amplify other regulatory climate adaptation reporting, we consider that:

- ARP5 could support better annual corporate climate risk disclosures by in-scope companies in both the public and private sector, by ensuring that reporting organisations are conducting comprehensive climate risk assessments, making plans to adapt and tracking progress on a five-yearly cycle, and using this information to inform their annual financial disclosures
- ARP5 should provide additional, value-adding information to the requirements of the economically regulated utilities.

We would seek to provide guidance that supports these aims, setting out where ARP supports other reporting and vice versa. In order to reduce duplication, we propose to allow organisations to signpost relevant sections of their annual or other publicly available reports in their ARP reports, if they contain information that fulfils ARP5 requirements. They may also share supporting information confidentially with government if it is commercially sensitive – in this event, the government would need to ensure the appropriate safeguards are in place.

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/Disagree/Unsure

Please give reasons (optional)

Free text

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

Agree/disagree/unsure

Please give reasons (optional)

Free text

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

Free text

Risk assessment

Given ARP's important role in providing insights and evidence for the UK Climate Change Risk Assessment (proposed ARP5 Objective 2), we propose to ensure that the guidance for ARP5 risk assessment prompts reporting organisations to consider the risks set out in

the forthcoming fourth UK Climate Change Risk Assessment (CCRA). The CCC's advice on this is due for publication in 2026. An addendum to the ARP5 guidance may be issued if the UK government's CCRA is substantially different to the CCC's independent technical advice which precedes it.

Climate scenarios

We will update the climate scenarios recommended in the ARP4 guidance to reflect the government's shared planning assumption for climate resilience. We propose that the ultimate selection of climate scenarios can remain flexible, as this will continue to depend on an organisation's functions, the lifecycles of their assets and other relevant considerations. Therefore, we propose once more not to mandate the use of a particular climate scenario or set of scenarios. Nevertheless, we recognise the value of consistent approaches within sectors and as suggested above, we propose that industry representatives collaborate with the relevant government teams to agree shared reporting expectations.

Reporting by regulators

Insights by regulators play an important role in building the picture of climate resilience across the regulated industries and in line with our proposals above on scope, regulators in the ARP reporting sectors would be included in ARP5.

There was an increase in reporting by regulators in ARP4 (15 reports) compared to ARP3 (9 reports). Reports were received from Financial Conduct Authority, the Pensions Regulator, the Prudential Regulation Authority, the water regulator Ofwat, the communications regulator Ofcom, the energy regulator Ofgem, the Office for Nuclear Regulation, the Office of Rail and Road, the Civil Aviation Authority, the Environment Agency, Natural England, Forestry Commission, Marine Management Organisation (MMO), Historic England and the Food Standards Agency.

Regulator reports typically present a summary view of climate risks to their sector and information on the actions the regulator is taking to drive action on adaptation in the sector. There is evidence of regulators driving action on adaptation actions through setting targets, creating guidance and taking steps to improve the evidence base on climate risk and adaptation. They also presented insights on the progress being made in their sectors and the aspects they are finding challenging. This approach is appropriate for the nature of their remit and operations and we propose that our guidance continues to reflect this. Some regulators are multi-functional and in those cases their reporting also includes organisational risks as appropriate.

During the evidence gathering for our supporting reports, several economic regulators said that one of the drawbacks in the previous reporting round was that the short timescale for reports meant they were often unable to see individual company reports in time to prepare their regulator overviews. Reporting in ARP5 reverts to a typical 3-year window for

reporting, which may help solve this issue informally by enabling companies to share drafts of their reports with their regulator ahead of the longer deadline. Alternatively, government could set a shorter deadline for the economically regulated industries so that their reports can be received by their regulators in enough time for them to comment, accompanied by a commitment that the relevant regulators will report.

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?

Agree/Disagree/Unsure

Please give reasons (optional)

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

0 to 3 months, 4 to 6 months, 7 to 9 months, 10 to 12 months, exactly 12 months, more than 12 months

Please give reasons and/or other comments (optional)

Collective reporting

Continuing an overall trend across reporting rounds, ARP4 saw more reporting by multiple organisations in sectoral summary reports than in previous rounds. This approach has previously been taken to help streamline the reporting burden, particularly where sectors are made up of numerous small organisations. Invitations to provide collective reports have been determined on a case-by-case basis to date, with most stakeholders in favour of this approach. ARP4 saw the welcome inclusion of several new sectors reporting in this way, notably renewable energy and independent communications networks, bringing the overall number of reporting organisations involved in ARP to over 200.

Collective reporting can therefore act as a proportionate way for new sectors to engage with climate risk assessments and adaptation planning, building their capacity in the process. It also has advantages in providing sectoral systems perspectives and insights about a sector's overall risk profile, and in exposing potential vulnerabilities within interconnected systems.

However, it also has drawbacks in terms of the level of detail such reports may provide on the risks to specific infrastructure assets and services, and other gaps in coverage and information provision. These drawbacks have been highlighted previously by the CCC.

We are keen to ensure that where the infrastructure or services they manage is of sufficient size or criticality, organisations report individually rather than as a collective. This applies specifically to large energy generation and telecommunications companies who reported in round 1, or their successors, and in line with this strategy would receive a direction to report under the criteria set out above. This may be subject to specific thresholds we will set out in the final strategy following further exploration with stakeholders and departments.

For the remaining sectors, we will explore proportionate reporting approaches with industry representatives but expect that collective reporting will remain the most appropriate route for some. We will welcome any additional voluntary collective reports that come forward and include relevant guidance for them.

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

Agree/Disagree/Unsure

Please give reasons (optional)

Free text

Trade associations are not in scope of the legislation to receive a direction to report, as they are not themselves statutory undertakers or bodies with functions of public nature, since they exist for the benefit of their members rather than the public. We are keen to continue involving trade associations voluntarily in supporting ARP reporting, either by producing reports or supporting their sectors to do so.

To build on their previous reports in a way that has the potential to deliver most value to their members, we would like to test the potential for relevant energy and water trade bodies to collaborate on a joint report to consider the interdependencies across the two sectors, which are often cited by stakeholders as being particularly critical. This would aim to provide helpful information, insights and innovative approaches to managing interdependencies and cascading risks by the companies represented.

Whilst a direction cannot be issued to the trade associations to collaborate on such a report, in the spirit of the CCA 2008 section 62 provision which enables the Secretary of State to direct two or more organisations to provide joint reports, we suggest that relevant energy and water trade associations could collaborate on such a report.

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

Agree/Disagree/Unsure

Please give reasons and/or comments (optional)

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

Useful/Not useful/Unsure

Please give reasons (optional)

Costs and benefits of reporting

Defra undertook a value for money evaluation of ARP4 in summer 2025. All figures below are taken from this report.⁴

Estimating the costs of ARP5

Costs of reporting for ARP5 will largely fall to reporting organisations, who will need to dedicate time and resources to their reports. Government will also incur a cost in the preparation of supporting materials, administering the process and reviewing responses.

- The 2025 ARP4 value for money evaluation provides updated values of ARP costs. These estimates are based on a survey of 43 respondent reporting organisations.
- Overall total reporting costs clustered around £6,400 (median), with a mean of £25,600 due to a small number of high-cost cases. Additionally, organisations that used external resource, such as consultants (around 27%), had significantly larger costs compared to those who relied just on internal resource, with the median costs being £43,000 and £5,100 respectively.
- Reports produced collectively (i.e. on behalf of multiple organisations) had slightly higher typical costs (median £10,000; mean £19,000) but lower variability than individual organisation reports (median £6,100; mean £27,300). However, whilst collective reporting comes at a higher median cost, this does not reflect the higher amount of organisations represented within these reports, meaning that it is likely that collective reporting is likely to lead to lower costs per organisation.
- In the pilot of local authority reporting, local authorities had lower median costs (£5,500) than other organisations (£7,500). Meanwhile non-Local Authority, public sector organisations showed higher costs than private sector organisations, on average.
- Organisations that have previously reported on their adaptation largely estimated that resources were equal or lower than previous rounds, suggesting cost efficiency gains to be had from repeat reports.

⁴ Value for Money Evaluation of Adaptation Reporting Power 4 (ARP4), September 2025

- Government costs of the ARP4 round are estimated around £211,300 - £241,600. Given 101 reports submitted for ARP4, this averages out to £2,100 - £2,400 per report.

Estimating the benefits of ARP5

Private Benefits

- ARP reporting increases awareness of climate risk within reporting organisations. The ARP4 evaluation showed 72% of respondents felt the process had helped raise awareness of climate risk in the organisation.
- Reporting in ARP helps to incorporate these into climate risks into current risk management processes (64% of ARP4 evaluation respondents agreed the exercise had influenced strategic or governance processes). This may lead to adaptive measures that would not have otherwise been implemented. The ARP encourages reporting authorities to consider appropriate early adaptive action. This is particularly important in sectors where long-term planning is required.
- ARP reporting supports capacity building within organisations for climate adaptation, 73% of respondents found ARP4 beneficial to capacity building. Additionally, 75% of respondents found ARP4 to support refinement of adaptation options.
- Engagement in the ARP process can support collaboration between organisations. 66% of respondents reported collaboration benefits. This was particularly prevalent within collective reporting, with 83% of collective reports highlighting the benefits.
- Taking part in the ARP process can support ambitions. Around half of respondents in the ARP4 VFM evaluation reported increased ambitions to collect climate risk data. Results suggest that ARP served as an accelerator of ambitions rather than a starting point. This was particularly evident within full reporters, 70% of which reported greater ambition.

Societal Benefits

- There will be an unavoidable level of climate change, regardless of future global emissions because of the existing accumulation of greenhouse gases in the atmosphere. As a consequence, adaptation will be necessary in the UK. Hence, there are a number of ways that ARP reporting provides wider societal benefits. If organisations with public functions and those providing critical infrastructure services which are fundamental to society implement measures to address climate change impacts and risks, there will be a reduction or avoidance of future societal disruptions and costs leading to wider positive impacts to businesses, the economy and the environment. Identifying these risks through the ARP reporting can potentially avoid the problem of costs being borne by third parties as long-term risks are incorporated into organisations' strategic frameworks.

Other Benefits

- The ARP reporting will provide the government with information on current understanding of climate risks, and the benefit to organisations of incorporating climate change into their risk management strategies.

Estimating the value for money of ARP5

- Determining Value for Money (VfM) from ARP remains challenging as benefits are assessed qualitatively and descriptively rather than monetised. With monetised benefits unavailable, a 4E's (Economy, Effectiveness, Efficiency & Cost-Effectiveness) framework is used to assess VfM. Overall there is evidence to suggest ARP4 represented good VfM.
- The evaluation of ARP4 identified multiple signals of cost-effectiveness and efficiency. Over 70% of organisations reported increased awareness of climate risks, around half reported greater ambition to collect data or strengthen adaptation plans, and a majority agreed ARP4 supported reflection on their role in national adaptation. At the same time, 71% of respondents indicated their ARP4 resource use was the same or lower than in previous rounds, showing greater process efficiencies. Opportunities for further efficiency gains were also highlighted.
- The evidence developed through the evaluation suggests ARP delivers value for money. Costs for both organisations and government were moderate and proportionate, while benefits spanned organisational resilience, policy development, and national adaptation planning.
- Whilst benefits cannot be monetised at this time, increased climate awareness from organisations may lead to investment decisions taken into account climate risk. Literature suggests that every £1 invested in Adaptation leads to benefits to society ranging between £2-£10.⁵

Illustrative Example

To provide an estimate of the total cost of reporting for ARP5, an example is provided below with the assumption that strategic authorities would be mandated to report, and that we would receive similar results from other organisations to that from ARP4.

For this example, we assume that 20 strategic authorities provide a mandatory report (this could change depending on the number of strategic authorities in place during the reporting window). We also assume a similar level of reporting for other organisations (83

⁵ Watkiss, P., Cimato, F., Hunt, A. (2021). Monetary Valuation of Risks and Opportunities in CCRA3. Supplementary Report for UK Climate Change Risk Assessment 3, prepared for the Climate Change Committee, London.

provided reports in ARP4 of 103 invited). Government funding would need to be provided to support mandatory strategic authority reporting, so this is noted as a cost to government here.

Assuming a similar level of reporting to ARP4 of 83 responses plus the additional funding required for the combined authorities, we estimate the cost to government to be £375,000-£400,000. This is higher than ARP4 due to the funding that would be required for reporting by strategic authorities, should this be mandatory.

Costs to strategic authorities are estimated at £10,000 per report.

Costs to remaining organisations are estimated at £7,500 per report.

This is based on findings from the VfM evaluation of ARP4, which collated data from 43 respondents. It is important to note that results from the evaluation relied on retrospective self-reporting which may introduce uncertainty. Estimates should be taken as indicative rather than definitive. Median values were used as mean values were skewed by a small number of outliers.

After reports are submitted

ARP5 reports will form an important part of the evidence base for the fifth CCRA due in 2032. In addition, we would like to ensure that reporting organisations gain as much value as possible from the process this time round. We acknowledge that the provision of feedback on reports was patchy in round 4, with only certain sectors (notably including rail and local authorities) receiving any. Our evidence reports, reporting organisations and the CCC alike say that providing feedback on reports would enhance the value of the process.

Therefore, building on the self-assessment feedback template that was issued in ARP4, we propose to issue a detailed checklist alongside the guidance at the start of the reporting window, to help organisations understand 'what good looks like' for reporting. We will work with reporting organisations once they have submitted their reports to help them self-assess against this checklist and provide additional feedback.

We propose to make use of the advances in Artificial Intelligence and available tools within government to provide feedback and further analyse reports efficiently within our departmental resources. This is also likely to bolster the value for money of the whole process, including the usefulness of the information to government.

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

Free text (optional)

Devolved and reserved matters

The CCA 2008 section 62 reporting power can only be used on organisations whose functions are in England or are outside England and relate to reserved matters in Scotland, non-devolved matters in Wales and excepted matters in Northern Ireland.

The Secretary of State therefore has the power to issue directions to report to organisations in the devolved nations which undertake functions related to reserved matters but cannot give directions relating to a reporting organisation's devolved functions.

Some of the functions exercised by ARP reporting organisations in the devolved nations relate to matters which are not fully devolved. The devolved government still has some joint or concurrent control over these functions with a Minister of the Crown, or there are requirements for consent or consultation. The legal obligations of the Secretary of State to consult or obtain consent before giving directions relating to these functions are set out in section 64 of the Act.

In practice, requirements to gain consent or consult vary on a case-by-case basis and the Secretary of State will consult with or request consent from devolved governments on those issues with consultation, consenting or joint/concurrent control requirements prior to directions being issued. Any resulting direction to an organisation to report will only be related to non-devolved matters, and functions in England.

In ARP4, 12 reports were received from organisations with activities in the devolved nations (5 from airports, 1 from a port and 6 from power companies, some of which were collective reports made up of returns from groups of companies).

We will work together with the devolved governments to determine whether the use of directions is appropriate for any organisations conducting business in the devolved nations, before such directions may be issued in ARP5. For the avoidance of doubt, local authorities in Scotland, Wales and Northern Ireland are out of scope and are not included in our proposals to include English strategic authorities in ARP5.

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

Free text

Summary of questions

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

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

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?

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

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

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

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

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

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

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

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

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

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

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?

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

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

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?

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

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

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

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

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

Annex – Reports received in ARP4

Reports submitted under the Adaptation Reporting Power Round 4 (2023-2024)

(First-time reporting bodies are underlined)

Aviation

1. Birmingham International Airport
2. Civil Aviation Authority (CAA)
3. Edinburgh Airport
4. Aberdeen Airport
5. Glasgow Airport
6. Southampton Airport
7. Highlands and Islands Airports Ltd
8. London Gatwick Airport
9. London Heathrow Airport
10. London Luton Airport
11. Manchester Airports Group (Stansted, Manchester, East Midlands airports)
12. National Air Traffic Control Services
13. Newcastle Airport

Energy

14. Cadent Gas
15. Electricity Northwest Limited (ENWL)
16. Energy Networks Association
17. Energy UK (representing electricity generation companies including Centrica, Drax Power Limited, EDF energy, ENGIE, InterGen, RWE, Npower plc, Scottish and Southern Energy (SSE), Scottish Power Generation Ltd, Uniper, and Orsted, and reporting jointly with Solar Energy UK and Renewables UK)
18. National Gas Plc (Transmission and distribution)

19. National Grid Electricity Transmission Plc
20. National Grid Electricity Distribution
21. National Grid Ventures (NGV)
22. Northern Gas Networks
23. Northern Power Grid (Yorkshire) Plc & Northern Power Grid (Northeast) Plc
24. Office for Nuclear Regulation (ONR)
25. Ofgem
26. Scotia Gas Network (SGN) Plc
27. Scottish and Southern Electricity Networks (SSEN) Distribution
28. Scottish Power Energy Networks (Distribution and Transmission Limited)
29. UK Power Networks (London) & UK Power Networks (South East)
30. Wales and West Utilities Limited

Environment

31. Environment Agency (due imminently)
32. Forestry Commission (including Forestry England and Forestry Research)
33. National Trust
34. Natural England
35. Protected Landscapes (a joint report for the first time from National Parks England and the National Landscapes Association on behalf of all Protected Landscapes)
36. Royal Society for the Protection of Birds (RSPB)
37. Royal Society of Wildlife Trusts (covering 46 independent wildlife trusts)

Financial

38. Financial Conduct Authority (FCA)
39. Prudential Regulation Authority (Bank of England)
40. The Pensions Regulator

Food and agriculture

41. Agriculture and Horticulture Development Board (AHDB)

42. Food Standards Agency (FSA)

Heritage

43. Historic England and English Heritage (joint report)

Health

44. NHS England and UK Health Security Agency (joint report)

ICT

45. Vodafone (Three and O2 have submitted information to Ofcom which they have shared with us and the CCC, but which does not constitute an ARP report)

46. Independent Networks Cooperative Association (INCA) and Independent Service Providers Association (ISPA) (a joint report on behalf of independent telecommunications network providers)

47. Ofcom

48. TechUK (on behalf of data centres in the UK)

Ports

49. Associated British Ports (due imminently, covering Hull, Humber, Immingham, and Southampton ports)

50. Dover Harbour Board

51. Felixstowe Dock and Railway Company (for the ports of Felixstowe, Harwich International, and London Thamesport)

52. Milford Haven Port Authority

53. PD Ports, Statutory Harbour Authority for the River Tees (Teesport and Hartlepool)

54. Port of London Authority

55. Port of Sheerness and Mersey Docks (Peel Ports Group)

56. Port of Tyne

Other Marine

57. Marine Management Organisation (MMO)

- 58. Northern Light House Board
- 59. Trinity House (Light house Authority)
- 60. Seafish Industry Authority

Road and Rail

- 61. Arriva Rail London
- 62. High Speed 2 (HS2)
- 63. National Highways
- 64. Network Rail Infrastructure Limited
- 65. Office of Rail and Road (ORR)
- 66. South Eastern Railway
- 67. Transport for London (TfL)

Space

- 68. UK Space Agency (UKSA)

Water

- 69. Affinity Water
- 70. Anglian Water Services Ltd
- 71. Canal and River Trust
- 72. Northumbrian Water (includes Essex and Sussex)
- 73. Portsmouth Water Ltd
- 74. Severn Trent Water Ltd
- 75. South East Water Ltd
- 76. South Staffordshire Water Plc (includes Cambridge Water)
- 77. South West Water Ltd (includes Bournemouth Water and Bristol Water regions)
- 78. Southern Water Services Ltd
- 79. Thames Water Utilities Ltd

- 80. United Utilities Water Plc
- 81. Wessex Water Services Ltd
- 82. Yorkshire Water Services
- 83. Ofwat

Local Authorities (pilot) - 18 reports

- 84. Arun District Council
- 85. Blackpool Council
- 86. City of York Council
- 87. Colchester Borough Council
- 88. Coventry City Council
- 89. Darlington Borough Council
- 90. Derbyshire County Council
- 91. Forest of Dean
- 92. Hertfordshire County Council
- 93. Manchester City Council
- 94. North Tyneside
- 95. South Gloucestershire Council
- 96. Staffordshire County Council
- 97. Surrey County Council
- 98. Warwickshire County Council
- 99. Wiltshire Council
- 100. West Midlands Combined Authority
- 101. West of England Combined Authority (WECA)

