AR has responded to a DBEIS Consultation on Streamlined Energy and Carbon Reporting. The response began saying it has identified the promotion of measures to improve the environmental performance of our sector as a priority.

AR supported greater streamlining making four key points. First, it should be undertaken through existing company reporting mechanisms and did not impose costly additional burdens on companies and was restricted initially to large listed companies and the scheme not implemented for smaller companies until the first phase had been tested and evaluated.

Second, the proposed energy and carbon reporting policy should apply across the UK. This would place this initiative on the same basis as the CRC Energy Efficiency Scheme. It was pointed out that many of our larger members operate their businesses throughout the UK and having to comply with different requirements in the devolved jurisdictions would impose additional and potentially expensive and inefficient reporting procedures. In addition, it would make the identification of performance and subsequent policy initiatives more complex.

Third, reporting through annual reports is a sensible and efficient method of reporting. A new bespoke report format would be expensive and at this stage not justified. Reporting in this way should only occur once the audit process has been completed and the data in the annual report verified.

Fourth, there are already a number of sustainability reporting schemes as companies' 'green credentials' become increasingly important to trading performance and satisfying the requirements of customers and investors. More often, participation is undertaken voluntarily through initiatives by trade bodies or by membership of bodies such as the Better Buildings Partnership. In the light of this complex pattern, any single reporting framework to replace the current array of mandatory schemes should aim to complement existing initiatives.

==========