

Committee on Climate Change
Adaptation Sub-Committee
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Committee on Climate Change response to the consultation on the proposed new powers for Ofcom (Secondary Information)

I chair the Adaptation Sub-Committee (ASC) which is part of the Committee on Climate Change, a non-departmental public body providing independent advice to the UK Government and the national governments of Wales, Scotland and Northern Ireland on climate change mitigation and adaptation.

The Committee understand that, unlike other companies of critical national importance, companies in the electronic communications sector will not be required to submit reports to government outlining their preparedness for climate change. This is because they fall outside the definition of a statutory undertaker, as defined under the Climate Change Act 2008. Furthermore under the existing regulatory framework Ofcom does not have the necessary legislative powers to require the companies to provide this information. We consider that this is a major omission which affects the Government's ability to assess the preparedness of the UK for climate change.

The introduction of new powers under the Digital Economy Bill for Ofcom to require companies to report on risk assessments and emergency planning provides an opportunity to correct this omission. We believe the case for action is clear:

- Although the UK Government is leading the way in arguing for global emissions reductions, the science clearly shows that there is an approximately even chance of global temperatures exceeding 2°C above pre-industrial levels even if the world committed to the global emissions reductions set out in the CCC's 2008 report. UK society will need to adapt to some climate change over the next few decades;
- The UKCP09 climate projections show how climate change might affect the UK, including: increased risks of flooding, erosion, increased risks of subsidence and higher building temperatures. The Garnaut Review in Australia specifically looked at the risks to Australia's telecommunications infrastructure and identified increased risks of:
 - Flooding of exchanges,
 - Damage to transmission lines,
 - Reduced stability of buildings, and
 - Overheating of exchanges;
- Physical investments in this sector tend to be long-term in nature and companies need to take into account the range of potential climate impacts, and the timescale over which they occur, to ensure that these investments will continue to deliver services as the climate changes.
- The electronic communications sector underpins a range of essential services, which could be seriously disrupted if services delivered by these companies were interrupted even for a short time. In 2004 fires in a BT cable tunnel in Manchester put 130,000 landlines out of action, affected internet services and disrupted emergency communications. In addition, bank machines were put out of action and local retailers could not accept credit or debit cards since they require phone checks over telephone lines;
- The IPCC noted in their 4th Assessment Report that climate change is likely to lead to an increase in the magnitude and/or frequency of extreme events. In 2005 Hurricane Katrina showed how the loss of telecommunications, through physical damage and overloaded networks, hinders or delays emergency responses;
- In order to develop UK policies for addressing climate impacts the Government needs to judge the risks UK society faces and the organisational

readiness of those responsible for addressing these risks. A range of companies will be required to provide this information under the climate change reporting powers framework, including companies in the water, energy and transport sectors. The omission of the electronics communication sector – which is part of the UK's critical national infrastructure – is a major gap.

To remedy this oversight, and in response to your consultation, the Committee recommends that:

Question 1: Do you agree that Ofcom should have the power to require that electronic communications operators report to Ofcom on risk assessments carried out?

- Yes, in particular electronic communications companies should provide information on their preparedness for climate change to Ofcom under the new powers, and
- The information provided to Ofcom should meet the requirements set out in any Direction from Defra's Secretary of State to Ofcom on the industry's preparedness to address climate change risks.

These changes will improve the resilience of the communications sector, and the sectors that depend upon it, in the short and longer term, and in doing so improve the UK's capacity to adapt to the future impacts of climate change.

Yours sincerely,



Lord Krebs Kt FRS