

IEMA RESPONSE TO THE UK TRANSITION PLAN TASKFORCE CONSULTATION ON THE TPT DISCLOSURE FRAMEWORK

ABOUT IEMA

IEMA is the professional body for those people working in environmental management and in corporate sustainability roles. IEMA's growing membership of over 20,000 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from sustainability directors through to climate change leads and in consultancy and advisory roles). We also work with a range of corporate partners. Our professional members are active across all sectors in the UK, for example from construction and manufacturing through to logistics, facilities, and across financial, retail, food, consultancy and the wider service and public sector.

IEMA'S CONSULTATION RESPONSE

The consultation is broad, with organisations and individuals invited to suggest changes to each or any of the proposed disclosure recommendations. An IEMA workshop session highlighted the purpose of the disclosure framework, which is to enable an organisation to report on how it will transition to a low carbon economy, within its own actions internally and more broadly through actions impacting the wider economy.

An ongoing concern for those in the environment sector is ensuring that actions around climate change move from the boardroom and sustainability department and out across organisations as a whole. Consequently, IEMA's response focuses on the skills recommendation.

Where relevant, how would you suggest we change the disclosure recommendation for 5.5 Skills, competencies and training : Describe how the entity ensures that it has the appropriate skills, competencies and knowledge across the organisation to effectively design, develop and deliver the transition plan.

IEMA's feedback on this Recommendation is that understanding and closing skills gaps should be given prominence within the text of the Framework rather than being captured within the Interpretive guidance. An accordingly updated Disclosure Recommendation could read (with our additional text underlined):

Describe how the entity will ensure that it has the appropriate skills, competencies and knowledge across the organisation to successfully deliver its transition plan. This should include how the entity:

- will map its ability to address green challenges and the green capability of internal functions;
- will take steps to close the gaps that emerge; and
- ensure that relevant board members are involved, and that the board and executive management have or have access to appropriate skills, competencies and knowledge required to provide for effective oversight of the transition plan.

The Institute of Environmental Management and Assessment (IEMA) has carried out a considerable amount of research into green skills and has identified that while conversation around green skills often focuses on emerging technologies, a vastly underappreciated need exists for green skills in non-specialist roles.

As a result of its research, IEMA has developed a maturity matrix, which enables an organisation to assess its capabilities, and build a framework for an effective transition. The matrix and the organisational blueprint¹ show how green skills gaps can be identified and the missing green skills can then be embedded into jobs families.

It is clear that very few organisations are at the leading edge of the maturity matrix and therefore it follows that establishing what and where the skills gaps are is a critical yet underestimated first step in the transition planning process.

The proposed Transition Plan Framework Disclosure recommendation (under 5.5) includes describing how the entity will ensure that it has the appropriate skills, competencies and knowledge across the organisation to successfully deliver its transition plan, but mostly focuses on the board and executive management's oversight capabilities. This is too limited and as highlighted above green skills should be embedded across the entirety of an organisation.

¹ [Greening your organisation for a green workforce transformation \(iema.net\)](https://www.iema.net/greening-your-organisation-for-a-green-workforce-transformation)