



MINISTRY OF DEFENCE

Ministry of Defence

**The Sustainable Development Report and Action Plan 2008**

**Annex B**



# Sustainable Development Report 2007/08

## Assurance Statement

### Objective

Enviros was commissioned by the Safety, Sustainable Development and Continuity Division (SSDC) MOD to conduct an independent verification of the 2007/2008 Sustainable Development Report, covering the period April 2007 to March 2008. The objective was to provide assurance on the completeness and accuracy of the information presented.

### Verification Process and Scope

The verification process involved reviewing the report content and drawing up a schedule of points to be verified. These were selected from: performance grading, numerical data and claims of achievement. Verification was achieved by visiting sites and interviewing staff responsible for the data, supplemented by inspection of internal records, reports and data supplied by MOD. A sample of performance data was additionally exposed to more rigorous verification in order to assure the data, and the collection and collation practices.

Case studies were not part of the verification scope. Data supplied by Defence Analytical Services Agency and UK Defence Statistics or reproduced from the MOD's Annual Report and Accounts 2007/08 were also excluded from the main verification process. These data had already been reviewed by others and were taken as being accurate and were not subjected to further checking by Enviros save to provide assurance that the data had been presented in the correct context.

### Responsibilities

SSDC was responsible for collecting data, preparation of the Sustainable Development Report and its contents. As part of the verification process,

Enviros made comments to amend the content of the Report. These comments covered issues of both completeness and accuracy. They were, however, minor in the context of the overall content of the Report. This statement is the responsibility of Enviros and represents its independent and objective opinion.

### Accuracy and Completeness of the Report

Enviros has examined sample data and statements within the five main sections of the Report (Sustainable Consumption and Production, Climate Change and Energy, Natural Resources, Sustainable Communities and Delivery) and have found the majority of the points chosen for verification to be materially accurate. However, there were a few points where documented evidence was not readily available for verification. The most significant of these were related to waste and waste data.

Data collection systems are improving across the Department with particular improvements in areas of water and energy reporting although neither of these datasets is yet complete. In addition, the responsibility for data collection is being better communicated and organised internally leading to improvements in data reliability. However, the report would be improved by more explanation of the limitations of data and the estimated coverage and accuracy. In particular, waste data is patchy and some reported data are still based on estimates in spite of waste reporting being a requirement by the UK government since at least 2002. The performance trends described in the report are considered to be reliable and indicative of the progress being made across the Department. Particularly commendable is the progress against water, biodiversity, and heritage targets and there are several other targets on track for achievement in future years.

The MOD has recognised the importance of climate change to its operations and wider society in its future strategy. Reporting on performance change for this issue, in this report, is largely concerned with energy use on the estate and in administrative travel. However it is welcome that the initial analysis of MOD CO<sub>2</sub> emissions included in this year's report covers military motive fuel use. We look forward to the related performance information being reported in future reports.

### **Reporting against MOD Sustainable Development Action Plan (SDAP) 2007-2012**

The MOD's commitment to Sustainable Development as evidenced in its Sustainable Development Action Plan 2007-2012 is ambitious and commendable. The SDAP covers many key sustainability issues relevant to the MOD although there is still scope for expanding these in future. The alignment between the SDAP and this Sustainable Development Report is good and allows stakeholders to map progress against commitments in most areas. It is noted however that reporting on a few commitments and performance indicators reported on in previous years has been omitted without comment, for example; percentage of civilian and service personnel with disabilities, defence value and reputation using public opinion polls.

### **Future reporting**

This year's report features more disclosure than previous years for example on social and security operations and transition programmes for service personnel. However, the EnviroS assurance statement in the 2005 report welcomed the inclusion of subjects such as environmental incidents, crown censures and a commitment to report on radioactive waste, legacy issues and munitions. It is disappointing, particularly in view of the substantial advice given, that these issues have not been included in this latest report and would urge MOD to consider their inclusion in future.

In addition to improved disclosure this years report also contains a number of commitments for areas not previously covered (e.g. the military use of fuel). We anticipate that MOD will be able to report progress against all these commitments and look forward to tracking MOD's performance in future reports.

For areas, such as waste, where complete data collection is proving difficult MOD should put more reliance on its existing Environmental Management Systems to provide data where external contracts are not yet able to.

Lastly, more attention should be devoted to the assurance of data prior to its inclusion in the report and more correlation between the report content and non-MOD stakeholder consultation and feedback. The MOD is a vast organisation with many and varied interested parties. To meet their expectations is a major challenge but one that MOD is capable of achieving over time.



Steve Rintoul



## MOD Response to Assurance Statement

MOD welcomes Enviros's assurance statement, their verification of the data reported and their recognition of the progress we are making.

MOD published the Sustainable Development Action Plan (SDAP) 2007-2012 in July 2007, which revised the actions reported on in the last report published in 2006. This set out the Department's targets to be achieved by 2012 and outlines the key priorities for Defence in contributing to the aspirations of Sustainable Development. This year's SDRAP is written against the SDAP 2007-2012 and updates the targets set in the SDAP.

We recognise the need for accurate and reliable data and have made a great deal of progress, particularly on waste. However, we still have much to do and it will take time to change all the legacy contracts to provide us with the data we need. See the Delivery and Waste sections for further details of what we're doing and the targets we are setting ourselves.

In this report it was decided that we would not report radioactive waste disposal. Radioactive waste is dealt with very differently to other waste streams and has its very own specific governing regulations and is not part of the Government's SOGE waste target or the MOD SD Strategy. Waste arisings from solid low, intermediate and high level wastes are published in the UK Radioactive Waste Inventory<sup>1</sup> (formerly the NIREX Inventory). Low level Wastes that are suitable for disposal to the Low Level Waste Repository near Drigg in Cumbria are denoted in the inventory. Liquid and gaseous waste discharges are published in the Pollution inventory<sup>2</sup>. It should be noted that MOD does not produce High Level waste.

We welcome the advice given by Enviros for future reporting. We would like to thank the team from Enviros for all their hard work and assistance in reviewing and verifying this years' SDRAP.

<sup>1</sup> <http://www.nda.gov.uk/ukinventory/>

<sup>2</sup> <http://www.environment-agency.gov.uk/business/444255/446867/255244/>

**Safety, Sustainable Development and Continuity Division**

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