



House of Commons
Environmental Audit
Committee

**Government Response to
the Committee's Seventh
Report of Session 2005–06
on Sustainable Development
Reporting by Government
Departments**

**Fourth Special Report of Session
2005–06**

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The Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by Her Majesty's Ministers; and to report thereon to the House.

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The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the Internet at: www.parliament.uk/parliamentary_committees/environmental_audit_committee.cfm.

A list of Reports of the Committee in the present Parliament is at the back of this volume.

Committee staff

The current staff of the Committee are: Mike Hennessy (Clerk); Sara Howe (Second Clerk); Richard Douglas (Committee Specialist); Oliver Bennett (Committee Specialist); Louise Smith (Committee Assistant); Caroline McElwee (Secretary); and Robert Long (Senior Office Clerk).

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References

In the footnotes of this Report, references to oral evidence are indicated by 'Q' followed by the question number. References to written evidence are indicated by page number as in 'Ev12'. number HC *-II

Fourth Special Report

Sustainable Development Reporting by Government Departments— Government Response

1. The Environmental Audit Committee published its report on *Sustainable Development Reporting by Government Departments* on Wednesday 28 June 2006 as HC 1322.
2. The Government's Response to the Committee's Report was received on Monday 16 October 2006 in the form of a memorandum to the Committee. It is reproduced as an Appendix to this Special Report.

Appendix

GOVERNMENT RESPONSE TO ENVIRONMENTAL AUDIT COMMITTEE REPORT - SUSTAINABLE DEVELOPMENT REPORTING BY GOVERNMENT DEPARTMENTS

Introduction

The Environmental Audit Committee of the House of Commons published *Sustainable Development Reporting by Government Departments* on Wednesday 28 June 2006.

The Government thanks the Committee for its report and the National Audit Office and other organisations and individuals that submitted evidence to the Committee. We have carefully considered the report and the evidence. The Government's response to the Committee's conclusions and recommendations follows.

Recommendation 1. The Framework for Sustainable Development on the Government Estate set a target that Departments should have arrangements to verify their sustainability performance data by April 2003. While the latest evidence suggests that departments have largely fulfilled this requirement, we remain concerned that the framework targets are neither demanding nor specific. We expect Defra and the Treasury to set out what they would expect in terms of validation or verification. (Paragraph 7)

1.1 The Government has completed a commitment in the UK Sustainable Development Strategy, 'Securing the Future' (March 2005), to review the Framework for Sustainable Development on the Government Estate. The Sustainable Operations Board (SOB), chaired by Ian Andrews (2nd Permanent Secretary, MoD) which includes representation by key Departments at Management Board level and includes the Sustainable Development Commission, was appointed to oversee this review.

1.2 A new range of sustainable operation targets for the Government Estate were announced by the Prime Minister and the Environment Secretary, David Miliband on 12 June 2006. The new targets are based around the four priority areas in the UK Strategy: Climate Change and Energy, Sustainable Consumption & Production, Natural Resource Protection and Sustainable Communities. These new targets are demanding in nature and will deliver a significant change in the way that Government manages its land and buildings. With more focus on delivery, it will mean that these targets, though fewer in number, will catalyse change more effectively as they are more stretching and are longer-term commitments allowing more time to plan significant change.

1.3 These new targets demonstrate leadership and a willingness to challenge ourselves to make substantial changes to the way we operate in the key areas of Carbon neutrality; Carbon emissions; Energy efficiency; Waste and recycling; Biodiversity; and Water consumption. A complete list of targets is attached at **Annex A**. Alongside the targets, a common set of enabling activities has been mandated to enable implementation and delivery against specific commitments.

1.4 Following publication of the Government's sustainable development strategy, responsibility for reporting on Government's performance against its operational targets moved from Defra to the Sustainable Development Commission (SDC). The SDC published its first report on 16 December 2005, covering Government progress against operational targets for the year April 2004 to March 2005. This report was based on data prepared by PricewaterhouseCoopers (PwC) who were contracted to independently manage and collate the data from Departments. The SDC also provided a separate commentary, *'Leading by example?...not exactly'*¹, which included a 'traffic lights' analysis system and departmental star ratings based on PwC's data.

1.5 The move of responsibility for reporting to the SDC has already generated benefits in terms of increased media interest. Their first report has been extensively reported in the press and trade journals throughout the year with many journalists now using the data as a key point of reference. The SDC has tasked itself to promote its progress reports to government and non-government audiences in an accessible way. To help with this it has produced a set of on-line resources, including a searchable database and Departmental case studies which support departments in comparing their progress against each other, celebrate and share their successes, and increase general public awareness of the extent and variety of government operations.

1.6 To ensure effective monitoring against the new operational targets, launched in June, the Government will identify a set of core data to be collected and reported against. Progress against the new targets will be assessed for the first time in 2007 covering the reporting period April 2006 to March 2007. In addition in line with the previous Framework targets Departments should have arrangements in place to verify their data collection systems and performance data.

¹ SDC (2005) *Leading by example?...not exactly* <http://www.sd-commission.org.uk/watchdog/>

Recommendation 2. We strongly recommend that Departments which have not yet taken steps to improve the quality of their sustainability reporting, in response to the NAO's analysis or our consultation on it, should do so as soon as possible in order that these improvements can be seen in the 2006-07 reporting cycle. (Paragraph 10)

2.1 Following the publication in November 2004 of the NAO's analysis of annual sustainable development reporting, you [the Committee] invited government departments to outline any resulting actions they plan to take. Many of the resulting improvements have already been delivered in the Departmental Annual Reports covering 2005/6 and the first set of Sustainable Development Action Plans. In addition the Treasury has augmented the 2006/7 Financial Reporting Manual with Practical Examples, Proformas and links to websites with further guidance on sustainable development reporting.

2.2 Further improvements planned for the 2006-07 reporting cycle include Defra's intention to work with the Sustainable Development Commission to draw up guidance on how departments should meet their commitment to report on progress against their SD Action Plans. Plus, as mentioned in our response to the first recommendation, Government has announced it will identify a set of core data that must be collected to monitor delivery against the new operational targets. By adopting this approach, Departments will report in a comparable format so that overall performance against the targets can be monitored and allow for data comparability.

Recommendation 3. We are concerned that there are some very significant areas of departmental activity which currently fall outside the parameters for what sustainable development reporting there is in Government. Individual departments must look to find mechanisms for reporting comprehensively on the environmental or SD content of PFI contracts and other private investment initiatives with which they are involved. (Paragraph 11)

3.1 We recognise the importance of Public Private Partnerships (PPP) such as the Private Finance Initiative (PFI) to helping us move towards sustainable development in the UK. The effective use of PFI encourages and supports business in its move towards greater sustainability of its products and practices; this is especially powerful with reference to construction sector due to the small numbers of organisations involved, high levels of investment and the long timescales associated with the design, construction, maintenance and operation of buildings.

3.2 PFI contracts make procuring authorities plan long-term, for the whole life of a service provision. Authorities are required to better examine long-term investment needs. Authorities pay a service charge on PFIs and are consequently not superficially constrained by short-term affordability issues. Instead, they can consider options with a higher up front cost which over the whole life of the procurement can deliver greater Value for Money (VfM) gains.

3.3 Further, good design is considered and encouraged in PFI projects. HM Treasury are working with the Commission for Architecture and the Built Environment (CABE) to ensure that good design is adequately considered in PFI projects, and individual projects will frequently employ a 'CABE Enabler' to consider such issues. Well-designed assets can of course significantly improve environmental sustainability.

3.4 Current Government rules and guidance support the inclusion and monitoring of environmental and SD content within PFI contracts. The Treasury's *Green Book - Appraisal and Evaluation in Central Government*², covers in detail how the economic, social and environmental assessments of a project should be combined. Treasury rules require that all PFI projects demonstrate that they achieve VfM based on the appropriate transfer of risk to the private sector. Value for money is defined as 'the optimum combination of whole life cost and quality to meet the users requirement'. Therefore, public sector contracting authorities must take account of all aspects of cost, including running and disposal costs. The reference to quality enables contracting authorities to specify what they need to do to meet their own operational and policy objectives while contributing to the Government's objectives to deliver sustainable development.

3.5 Government is currently preparing its response to the Sustainable Procurement Taskforce's report, *Procuring the Future*³, which raised several concerns regarding PFIs. In our response, to be published this autumn, we will look to respond on these; issues of reporting, monitoring and scrutiny are important aspects of what will be covered in the Government response.

Recommendation 4. The UK Sustainable Development Strategy requires all Departments and Executive Agencies to produce an annual Sustainable Development Action Plan (SDAP) by December 2005 and "report on their actions by December 2006, for example, in their departmental annual reports and regularly thereafter." This clearly opens the way for valuable momentum to be lost. The Government should remove the ambiguity inherent in this formulation by requiring departments to update SDAPs and monitor progress against them on an annual basis. (Paragraph 12)

4.1 The Government intentionally chose to leave some flexibility in the timescales for Departments to update their Action Plans. For example a department may choose to prepare an Action Plan covering a 3 year period corresponding to the next Spending Review, reflecting that some major initiatives will take longer than 12 months for their introduction and effects to be measurable.

² HM Treasury (2002) *Green Book - Appraisal and Evaluation in Central Government*

http://www.hm-treasury.gov.uk/economic_data_and_tools/data_index.cfm

³ Sustainable Procurement Taskforce (2006) *Procuring the future*

<http://www.sustainable-development.gov.uk/publications/procurement-action-plan/index.htm>

4.2 In the SDC's 2005 guidance on preparing Action Plans, *Getting Started*⁴, it proposes that Departments can either report progress on their SDAP separately, or as part of the departmental annual report or current sustainable development strategy. But if the progress report is produced separately it should be cross-referenced in the departmental annual report.

4.3 However in all cases we, and the SDC, expect Departments to report annually on their progress against the Plan and its key deliverables and outcomes.

Recommendation 5. We are disappointed that 14 Departments and Executive Agencies did not meet the deadline for the submission and publication of their Sustainable Development Action Plans, which will be a key influence for the future of sustainability reporting. We urge the 5 which have still to publish these Plans to do so as a matter of urgency. (Paragraph 14).

5.1 All Government Departments have now drafted their Action Plans. In the case of the Foreign and Commonwealth Office (FCO) it published its Sustainable Development Strategy (SDS) in March 2005; the Sustainable Development Commission agreed that in the first instance it would assess the new SDS in place of an action plan. FCO is preparing a new Sustainable Development Action Plan to be published by the end of 2006.

5.2 Copies of Departmental Plans are available from the Government's sustainable development website⁵, and all departments and relevant agencies are required to post a copy on their own websites.

Recommendation 6. Departmental Sustainable Development Action Plans must be sufficiently robust and specific to allow progress can be monitored. It is early days for such Plans, and Departments will need to improve their performance in this area. We look to DEFRA and the Sustainable Development Commission (SDC), responsible for overseeing the completion and quality of the Plans, to ensure that these Plans are of the requisite quality. We expect to take evidence both from DEFRA and from the SDC in the future in respect of their responsibility for this area of SD monitoring. (Paragraph 15)

6.1 Previously Defra was responsible for co-ordinating the production of the Government annual report of its progress against the 1999 strategy, *A better quality of life*⁶. A series of Government reports, *Achieving a better quality of life*, were published by Defra every year from 2000 to 2004. However, with the new strategy, launched March 2005, we took the decision to move to independent scrutiny of action on sustainable

⁴ SD Commission (2005) *Getting Started - An SDC guide for Government Departments and Executive Agencies* <http://www.sd-commission.org.uk/publications.php?id=254>

⁵ HM Government (2005 and 2006) *Policies and action plans by department* <http://www.sustainable-development.gov.uk/government/department/index.htm>

⁶ HM Government (1999) *A better quality of life* <http://www.sustainable-development.gov.uk/publications/uk-strategy99/index.htm>

development across Government to determine whether real progress is being made. So the Sustainable Development Commission (SDC) took on a new stronger role, with its own director and increased resources, to act as an independent 'watchdog' looking at Government's delivery against the new Strategy.

6.2 The SDC's new responsibilities include independently reporting on the successful completion and quality of Departmental Sustainable Development Action Plans. In August 2005, the SDC published its guidance on preparing Action Plans, *Getting Started!* Its staff also met with each Department to provide informal advice and support whilst the Plans were being drafted.

6.3 The inclusion of an effective progress monitoring mechanism is one of the key criteria against which the SDC assesses the quality of an Action Plan. It is expected that Plans will include measurable targets and outputs, and will detail how these are linked to Public Service Agreements (PSAs) and the Government's set of 68 sustainable development indicators. Plans should also outline the accountability, monitoring, review and reporting mechanisms to be used.

6.4 This Autumn, the SDC will publish its review of the first set of Action Plans produced by Government Departments and their executive agencies. In this it will set out the challenges to Government to deliver against its current Plans, and propose how the next set of Action Plans may be improved. As mentioned in our response to Recommendation 2, following the publication of this report, Defra intends to work with the SDC to draw up guidance on how departments should meet their commitment to report on their progress against their SD Action Plans.

6.5 Furthermore Defra's sustainable development statisticians will continue to lead on the collective monitoring of the set of 68 Sustainable development indicators that provides an overall picture to the state of the nation. The agreed set of measures cover vital issues such as health, housing, jobs, crime, education and the environment, and provide a broad overview of Government progress in delivering the sustainable development strategy. The updated 2006 edition of *Sustainable development indicators in your pocket*⁷ was published on 31 July.

Recommendation 7. We recommend that Sustainable Development Action Plans should be published alongside Departmental Annual Reports in the spring, in order to set out plans and priorities. Sustainability reports should be published alongside the annual report and accounts, in order to set out results and performance. (Paragraph 19)

⁷ Defra (2006) *Sustainable development indicators in your pocket* http://www.sustainable-development.gov.uk/progress/documents/sdiy2006_a6.pdf

7.1 We agree that Departmental reporting on progress against Action Plans, and hence against their contribution to delivering the Government's Sustainable Development Strategy, would sensibly coincide with the normal financial year reporting cycle for departments. Following discussions with the SDC we recommended that the first set of Departmental progress or 'sustainability' reports, should review achievements up to end March 2007; rather than reporting in terms of progress against a calendar year.

7.2 As mentioned earlier Departments can either report on progress as part of its departmental annual report, or separately as a standalone report. Separate annual sustainable development reports, covering operations, policy and people management are already prepared by the Ministry of Defence (MOD)⁸ and the Department of Work and Pensions (DWP)⁹.

7.3 Where the progress report is integrated into the departmental annual report this will, naturally, mean reporting in the Spring. However we are keen to allow some flexibility in the timing of the standalone reports. For example the DWP needs to collate and analyse operational data from its 1,700 sites in the preparation of its annual Sustainable Development Report. In cases such as these we recommend clear cross-referencing in their departmental annual reports to the standalone report to be published later that year.

Recommendation 8. Sustainability reports would link to and almost certainly expand on the relevant section of the Departmental Management Commentary. Whereas the Management Commentary would focus on environmental and social matters which were significant to the Department's financial affairs, and be forward looking, we recommend that the sustainability report would capture past performance in more detail than can be accommodated within the Management Commentary. We would expect the sustainability report to cover achievement against the Action Plan, which in turn would cover both the Department's operations and policy and its contribution to the UK Sustainable Development Strategy. (Paragraph 20)

8.1 We agree that each Department's Sustainable Development Action Plan, and their 'sustainability reports' on progress against it should address the key areas of policymaking and operations in the context of delivery of the new sustainable development strategy, *Securing the future*.

8.2 In the SDC's 2005 guidance on preparing Action Plans, *Getting Started*¹⁰, it proposes that each Plan should cover the broad areas of setting out the departmental

⁸ MOD Sustainable Development Annual Report 2005
<http://www.mod.uk/DefenceInternet/AboutDefence/WhatWeDo/HealthandSafety/DSC/SustainableDevelopmentAnnualReport2005.htm>

⁹ DWP Sustainable Development 5th Annual Report 2005 <http://www.dwp.gov.uk/sus-dev/>

¹⁰ SD Commission (2005) *Getting Started - An SDC guide for Government Departments and Executive Agencies*
<http://www.sd-commission.org.uk/publications.php?id=254>

vision for sustainable development; the business case and benefits; action and commitments in the areas of policies, operations and people management and how the Plan will be monitored and evaluated. Each Plan will therefore provide the forward looking, strategic overview for a Department, focusing on key economic, environmental and social matters where their policies and future operational performance can contribute to delivering the Strategy.

8.3 As mentioned previously, the progress or ‘sustainability’ report against the Action Plan, can be a standalone report, or integrated within the annual Departmental report. In either case, it should provide in suitable detail how particular targets and commitments have been achieved. Defra now intends to work with the Sustainable Development Commission to draw up guidance on how departments should meet their commitment to report effectively and efficiently on progress against SD Action Plans.

Recommendation 9. Whilst we recommend that all Departments produce an annual sustainability report, we also believe that there needs to be flexibility for Departments about how they approach their reporting, within some broad parameters. On the policy side, we would expect sustainability reporting to cover how the Department's work links to and supports the UK Sustainable Development Strategy, headline indicators and any related PSA targets for which it is wholly or mainly responsible. On the operational side, we would expect the report to cover performance against the SDiG Framework. An area for further development would be a set of core measures to measure environmental footprint, along the lines of the Key Performance Indicators that Defra proposed for Operating and Financial Reviews in the private sector. (Paragraph 23)

9.1 We agree that Departments should be given flexibility about how they approach their reporting, within some broad parameters which include covering both operations and policy, and addressing PSA indicators for which the Department has responsibility.

9.2 There are a wide number of frameworks, which include a recommended set of core measures, that Departments could potentially use to help report on their sustainability performance. These include the Global Reporting Initiative (GRI)¹¹ and the United Nations Conference on Trade and Development’s (UNCTAD’s) Guidance¹² on accounting for environmental impacts. The Global Reporting Initiative (GRI) is widely considered to be the most comprehensive sustainability reporting framework.

9.3 In January 2006, Defra produced a set of ‘*Environmental Reporting Guidelines – Key Performance Indicators (KPIs)*’¹³ to help companies address their most significant

¹¹ Global Reporting Initiative (2002) *Sustainability Reporting Guidelines*
http://www.globalreporting.org/guidelines/2002/GRI_guidelines_print.pdf

¹² UNCTAD (1998) *Environmental Financial Accounting and Reporting at the Corporate level*
<http://www.unctad.org/en/docs/isa15d2.pdf>

¹³ Defra (2006) *Environmental Reporting Guidelines – Key Performance Indicators (KPIs)*
<http://www.defra.gov.uk/environment/business/envrpe/evkpi-guidelines.pdf>

environmental impacts, identify environmental risks relating to company performance, and report on these in a way that meets the needs of their shareholders and other stakeholders. These Guidelines are broadly compatible with GRI's technical protocols, on indicator measurements for the environment. We believe that the GRI will become the 'gold standard' that provides a detailed, globally applicable framework for sustainability reporting. We have provided funding towards the current review of the GRI guidelines, and are considering how best to respond to their current consultation.

9.5 As you are no doubt aware, the Operating and Financial Review (OFR) was repealed in January 2006. The abolition of the OFR means that the Business Review, contained within the Company Law Reform Bill becomes the statutory underpinning for company reporting in this area. In light of the March consultation, new amendments to the narrative reporting requirements within the Business Review were put forward by Government in May. The Bill is currently being debated in the Commons.

Recommendation 10. It will be important that a single department, and indeed a named senior official takes ownership and responsibility for the development of departmental sustainability reporting. Defra and the Treasury are the main candidates for doing so, notwithstanding the role that the Sustainable Development Commission have in the development of SDAPs. (Paragraph 25)

10.1 Though the Commission is responsible for monitoring and reporting of Government's delivery of sustainable development, it is, of course, Government who sets targets and mandates what data Departments must provide. Defra leads on sustainable development policy, with collective decisions taken by Cabinet committee.

Annex A – NEW SUSTAINABLE OPERATIONS TARGETS FOR THE GOVERNMENT ESTATE

PRIORITY AREA	TARGETS
<p>CLIMATE CHANGE & ENERGY</p>	<p>CARBON EMISSIONS FROM OFFICES</p> <ul style="list-style-type: none"> • Reverse the current upward trend in carbon emissions by April 2007. • Reduce carbon emissions by 12.5% by 2010-11, relative to 1999/2000 levels. • Reduce carbon emissions by 30% by 2020, relative to 1999/2000 levels.
	<p>CARBON EMISSIONS FROM ROAD VEHICLES</p> <ul style="list-style-type: none"> • Reduce carbon emissions from road vehicles used for Government administrative operations by 15% by 2010/11, relative to 2005/2006 levels.
	<p>CARBON NEUTRAL</p> <ul style="list-style-type: none"> • Central Government’s office estate to be carbon neutral by 2012. <p>ENERGY EFFICIENCY</p> <ul style="list-style-type: none"> • Departments to increase their energy efficiency per m² by 15% by 2010, relative to 1999/2000 levels. • Departments to increase their energy efficiency per m² by 30% by 2020, relative to 1999/2000 levels.
<p>SUSTAINABLE CONSUMPTION & PRODUCTION</p>	<p>WASTE ARISING</p> <ul style="list-style-type: none"> • Departments to reduce their waste arisings by 5% by 2010, relative to 2004/2005 levels. • Departments to reduce their waste arisings by 25% by 2020, relative to 2004/2005 levels.

	<p>RECYCLING</p> <ul style="list-style-type: none"> • Departments to increase their recycling figures to 40% of their waste arisings by 2010. • Departments to increase their recycling figures to 75% of their waste arisings by 2020.
<p>NATURAL RESOURCE PROTECTION</p>	<p>BIODIVERSITY</p> <ul style="list-style-type: none"> • Departments to meet or exceed the aim of having 95% of Sites of Special Scientific Interest (SSSI's) in sole ownership or control in target condition by 2010.
	<p>WATER CONSUMPTION</p> <ul style="list-style-type: none"> • Reduce water consumption by 25% on the office and non-office estate by 2020, relative to 2004/2005 levels. • Reduce water consumption to an average of 3m³ per person/year for all new office builds or major office refurbishments.

October 2006

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Thirteenth	Greening Government 2003, HC 961 (<i>Reply, HC 489,2003-04</i>)

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Second	The Greening Government Initiative, HC 517 (<i>Reply, HC 426, Session 1998-99</i>)
Third	The Pre-Budget Report: Government response and follow-up, HC 985
Fourth	Climate Change: UK Emission Reduction Targets and Audit Arrangements, HC 899 (<i>Reply, HC 88, Session 1998-99</i>)
