

The Highland Council

Agenda Item	6
Report No	CCC/29/25

Committee: Climate Change

Date: 5 November 2025

Report Title: Climate Change Impact Assessment Update

Report By: Assistant Chief Executive – Place

1 Purpose/Executive Summary

- 1.1 The report provides an update on the extent to which the Climate Change Impact Assessment (CCIA) process has been embedded across Council operations and recommends actions to strengthen its integration into decision-making.

2 Recommendations

- 2.1 Members are asked to:-

- i. **Consider** and **note** the contents of this report; and
- ii. **Agree to recommend to Council** the approval of the project brief template in Appendix 2 of the report for inclusion in the Council's Net Zero Programme.

3 Implications

- 3.1 **Resource** – The recommendations outlined in this report may require additional staff resource to implement. Integration of the CCIA into the Granicus platform may involve system development costs and coordination with ICT.
- 3.2 **Legal** - The Council has several statutory obligations in relation to climate change, including reporting requirements under the Climate Change (Scotland) Act 2009 and the Public Bodies Climate Change Duties. In addition, the Council is required to directly support Scotland's national target to end its contribution to climate change by 2045.

The CCIA process plays a critical role in ensuring that Council decisions align with these obligations and contributes to compliance with our reporting requirements.

- 3.3 **Risk** – Failure to embed climate considerations into Council decision-making processes may result in reputational, financial, and operational risks, particularly in relation to climate resilience, adaptation, and emissions reduction. Strengthening the CCIA process mitigates these risks by enabling more informed and transparent decision-making.

3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – No Health and Safety implications arising from this report.

3.5 **Gaelic** – No Gaelic implications arising from this report.

4 Impacts

4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.

4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.

4.3 This is an update report and therefore an impact assessment is not required.

5 Background

5.1 The Council's Net Zero Strategy sets out a clear commitment to embed climate change considerations into all aspects of decision making. A key priority of the Strategy is the introduction of a Climate Change Impact Assessment (CCIA).

5.2 The CCIA was introduced in July 2024 as a core component of the Integrated Impact Assessment (IIA) tool, alongside assessments for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Islands and Mainland Rural Communities, and Data Protection. The IIA process was formally presented to Members in June 2024, establishing a unified framework for assessing the broader impacts of Council decisions.

5.3 The CCIA aims to ensure that proposals are assessed for their impact on emissions, biodiversity, and resilience, enabling informed decisions and appropriate mitigation or adaptation actions.

5.4 It is intended to be applied at the earliest stages of proposal development, ensuring climate considerations are embedded from the outset, not as an afterthought, into the shaping, designing, and delivering of services, policies, and projects. This proactive approach enables the Council to anticipate risks, identify opportunities, and embed climate resilience from the initial stages.

- 5.5 The purpose of the CCIA is to ensure that climate implications are visible and understood at the point of decision-making. It is not designed to prevent projects from progressing, but rather to eliminate the risk of decisions being made without awareness of their climate impacts.
- 5.6 Whilst there can be a tendency to focus on the potentially negative outcomes of project proposals, the CCIA process also serves to identify and promote positive climate actions. It provides a platform to highlight beneficial impacts and encourages changes in project delivery or design to maximise climate-positive outcomes.
- 5.7 The CCIA consists of two stages:-
- **Stage 1 – Screening:** Authors assess whether their proposal may impact climate-related factors: emissions, the environment and resilience. If any impact is identified, whether positive or negative, a Full Impact Assessment is required.
 - **Stage 2 – Full Impact Assessment (FIA):** Authors explore identified impacts in detail and outline mitigating or adaptive actions to support informed decision-making.
- 5.8 Each stage requires review and approval by the responsible manager. Once assessments are completed, they are published online and referenced within Committee reports.
- A flowchart illustrating the full process is provided in **Appendix 1**.
- 5.9 To support implementation, comprehensive guidance documents and online training have been developed to assist authors throughout both stages of the CCIA process. Subject matter expertise is also available from the Climate Change and Energy Team (CCET) upon request.

6 Review and key findings

6.1 Fairer Highland

As part of ongoing efforts to improve the IIA process, the Fairer Highland Group, comprising officers from across Council clusters, recently conducted a review through questionnaires issued to previous IIA authors and subject matter experts. The review focussed on user experience and identified recommendations for improvement. Next steps will be determined at a future meeting of the Group.

- 6.2 A key recommendation is the integration of the CCIA into the Granicus platform to enhance consistency and ensure alignment with other components of the IIA process.

6.3 CCIA Screening Outcomes and Analysis

Since the introduction of the IIA process on 1 July 2024, a total of 266 screenings have been submitted. The CCET has undertaken a review of these screenings to assess the effectiveness of the CCIA process and identify areas for improvement.

The outcomes of this review are summarised in the table below:-

Outcome:-	2024	2025
Full CCIA completed	5	6
Impacts not identified – FIA not required	62	91
Author has identified impacts, but Full CCIA not completed	34	36
Screening completed, CCET findings (combined category): • Author has not identified impacts, CCET disagrees with this assessment • Screening focused on downstream activity – potential upstream impacts not identified • Screening completed but lacks sufficient information to determine FIA requirement/enable CCET scrutiny	15	17
Total screenings:	116	150

6.4 Key Findings

- Only 11 FIAs have been carried out since the IIAs inception, despite 81 proposals identifying climate impacts. This discrepancy indicates a significant gap in adherence to the CCIA process and raises concerns regarding the extent to which climate considerations are being integrated into project development, delivery, and decision making.
- Whilst many authors do not provide reasons for the non-completion of an FIA, feedback has revealed two prevalent misconceptions:-
 - that an FIA is not required when the identified impact is positive; and
 - the CCIA applies only to downstream activities, such as implementation or delivery, rather than to strategic or upstream elements of proposals.
- Several screenings fail to identify potential climate impacts, indicating gaps in understanding, inadequate exploration of proposal scope, or lack of confidence among authors in applying the screening criteria effectively. This may result in the underreporting of climate-related risks or opportunities.
- Subject matter expertise from the CCET is generally sought only when an FIA is completed, resulting in limited scrutiny of the majority of submissions.
- Responsible Managers are frequently concluding that an FIA is not required, even when climate impacts have been identified during the screening stage. This undermines the integrity of the CCIA process and limits opportunities for informed mitigation or adaptation planning.
- Current systems do not allow CCET to determine how many proposals are developed without engaging in the IIA process. Furthermore, there is no mechanism to assess whether the IIA is being used iteratively to support the minimisation of climate impacts during proposal development.

7 Recommendations for strengthening the CCIA process

7.1 To strengthen the implementation and effectiveness of the CCIA process, the following actions are recommended.

7.1.1 Reinforce purpose and strategic value

- Reinforce that the CCIA process is not just about compliance, but a mechanism for embedding climate considerations into project development, delivery, and decision making.
- Promote the CCIA as a mechanism for identifying both risks and opportunities, including climate-positive outcomes.
- Reinforce alignment with the Council's Climate Change Adaptation Strategy and the need to address climate resilience in all proposals, and projects, to ensure they withstand the impacts of climate change we are experiencing both now and in the future.
- Encourage authors to highlight and maximise climate-positive outcomes within proposals.
- Share examples of best practice to build awareness and foster a culture of proactive climate planning.

7.1.2 Improve quality assurance and oversight

- Introduce a process for CCET to provide feedback on CCIA submissions to improve consistency and rigour.
- Introduce a review mechanism for decisions where an FIA is deemed unnecessary.
- Require Responsible Managers to provide clear justification when concluding that a FIA is not required, despite identified impacts.

7.1.3 Strengthen process design and guidance

- Update CCIA templates and guidance to ensure both positive and negative impacts are fully assessed.
- Introduce validation steps for incomplete or unclear submissions.
- Integrate the CCIA into the Granicus platform to ensure consistency with other IIA components and improve usability.
- Revise the screening stage to capture more detailed information on the nature of proposal impacts, enabling meaningful analysis even in the absence of a completed FIA.

7.1.4 Enhance training and support

- Deliver targeted training sessions to improve understanding of CCIA requirements and build confidence in applying screening criteria and identifying climate impacts.
- Promote early engagement with CCET from proposal development, not only at the point of FIA completion.

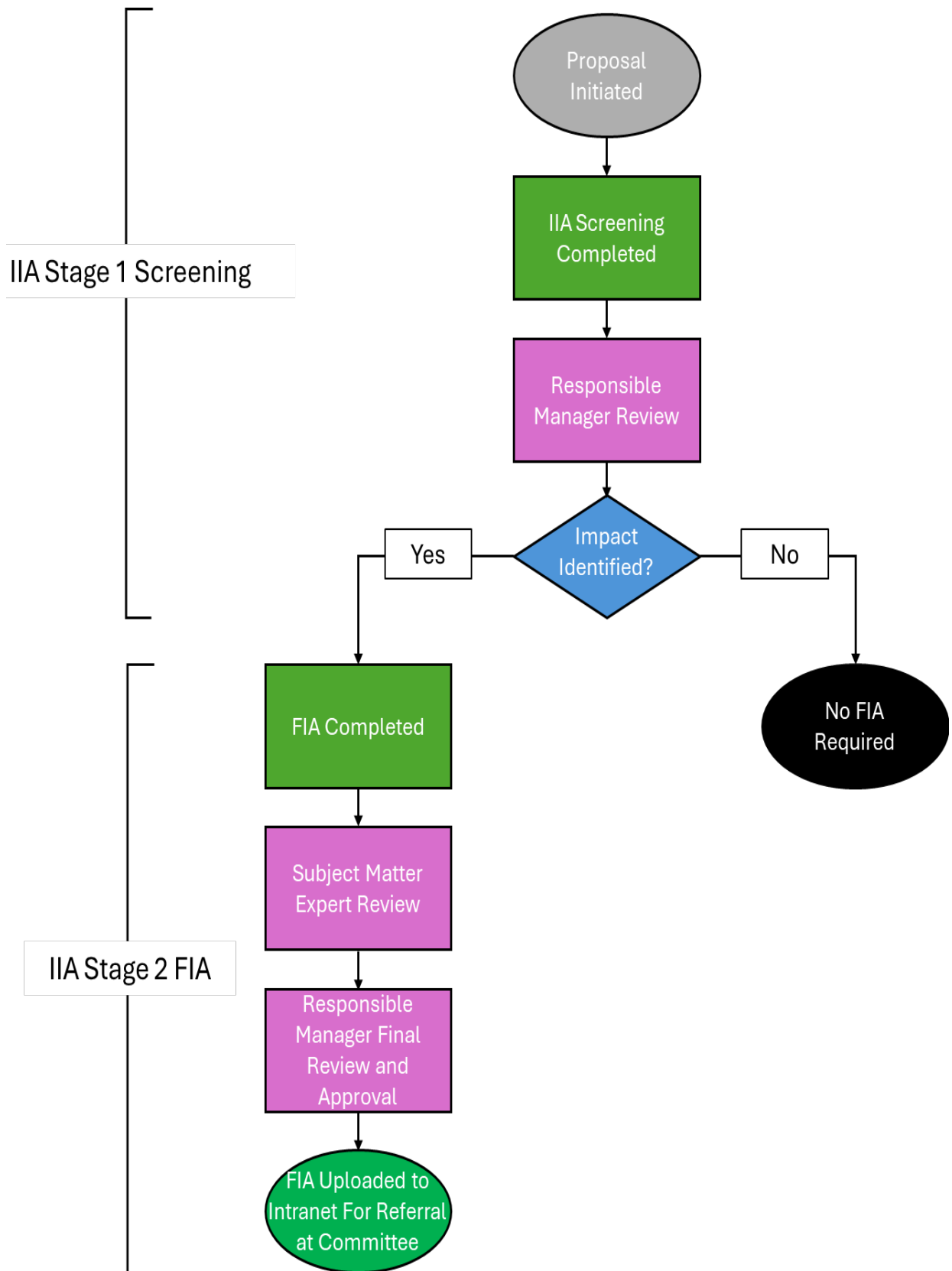
7.1.5 Improve monitoring and evaluation

- Investigate the development of a tracking system to identify proposals that do not engage with the IIA process, enabling better oversight of climate integration across Council activities.
- Establish mechanisms to assess whether the IIA is being used iteratively during proposal development to support impact minimisation.

7.2 A project template slide has been included at Appendix 2 for consideration, to support implementation of the above recommendations.

Designation:	Assistant Chief Executive - Place
Date:	6 October 2025
Authors:	Jonathan Bennett, Climate Change Co-ordinator Sarah James-Gaukroger, Climate Change Co-ordinator
Background Papers:	Climate Change Impact Assessment (CCIA) report Integrated Impact Assessment (IIA) report
Appendices:	Appendix 1 – IIA Process Flowchart Appendix 2 – Project template slide

IIA Process Flowchart



Thematic Group

Net Zero Delivery

Project

Climate Change Impact Assessment

Responsible Officer:
Net Zero Programme Manager



Net Zero Programme

Senior Responsible Officer:
Climate Change & Energy Manager

Project Sponsor:
ACE - Place

Activity

The CCET recently conducted a review to assess the extent to which the Climate Change Impact Assessment (CCIA) process has been embedded across Council operations.

Based on the findings, a series of recommended actions have been identified to strengthen the implementation and effectiveness of the CCIA process.

Project Elements

- Reinforce the purpose and strategic value of the CCIA
- Improve quality assurance and oversight to ensure consistency and rigour in CCIA submissions
- Strengthen process design and guidance to support effective screening and assessment
- Enhance training and support to build confidence and capability
- Improve monitoring and evaluation

Measures of Success

- Increased number of FIAs completed where climate impacts are identified
- Improved quality and consistency of CCIA's
- Enhanced confidence and capability among CCIA authors following training
- Improved adherence to CCIA requirements
- Integration of CCIA into Granicus platform to support streamlined IIA
- Improved consideration of impacts during proposal developing and decision-making

Milestones

- **Q3/4:** Updated CCIA templates and guidance agreed
- **TBC:** Monitoring and tracking system scoped
- **TBC:** Integration into Granicus platform
- **TBC:** Rollout of targeted training sessions
- **TBC:** Evaluation of CCIA process improvements and reporting to Climate Change Committee

Programme Theme 4) A Sustainable Highland Environment and Global Centre for Renewable Energy

Links to Performance Plan targets:

4.7

Links to Programme:

Place – Achieve our Net Zero Targets

Links to Delivery Plan:

Net Zero Programme

Key Risks

- Continued misunderstanding of CCIA requirements
- Low engagement with training and guidance
- Delayed integration into Granicus platform
- Lack of monitoring system
- Resource constraints