

PE2123: Update air quality standards in Scotland to align with 2021 World Health Organisation guidelines

Submission from Fife Council, 5 June 2025

1. Do you support amending the Air Quality Standards (Scotland) Regulations 2010 to align with the 2021 WHO air quality guidelines? Please explain your reasoning.

We would support the current AQS objectives changing but would caveat this with these being phased in over time as the monitoring equipment in use throughout Scotland (specifically with regards to Particulate Matter) has technical limitations in terms of minimum reporting values in relation to the implementation of the stricter objective levels. Thought will also need to be given to wider policies – beyond the scope of local air quality management – in order to achieve the recommended reductions in concentration where trans-boundary contributions dominate.

2. What progress has been made in reducing nitrogen dioxide and fine particulate matter in Scotland since 2022/23, when we last sought views on this?

Scotland has seen a noticeable decrease in Air Quality Management Areas (AQMA) since 2022/23 and also implementation of Low Emission Zones (LEZs) in the four major cities which have delivered significant air quality improvements.

Specific progress for Fife is available to view within our Annual Progress Reports and summarised in our latest Air Quality Strategy 2025 -30 which can be found online at the below web address:

<https://www.fife.gov.uk/kb/docs/articles/environment2/environmental-health/air-quality>

These reports indicate that in Fife, air quality is generally good with no exceedances of the current statutory air quality objectives at monitoring locations.

This includes the full revocation of our two Air Quality Management Areas at Appin Crescent, Dunfermline and Bonnygate, Cupar in 2023. This is believed to be as a result of improved traffic management, the Fife ECO Stars scheme, behavioural (includes walking and cycling initiatives), education (includes primary schools and dedicated web page) and strategic measures (integration into local planning and transport policies).

Current Fife Council monitoring data is also available on the Scottish Air Quality Database at:

<https://www.scottishairquality.scot/>

Fife Council has been commended by the Scottish Government, SEPA and Defra as an example of "good practice" in the field of local air quality management.

3. To what extent has scientific and public health evidence about air quality evolved since the current standards were adopted? In your answer you could refer, for instance, to impacts on nitrogen dioxide or fine particulate matter on particular groups of people, the effect of Low Emission Zones (or other interventions of a similar nature) on air quality, or any new information or data about the effect of burning particular types of fuel.

Both scientific and public health evidence about air quality has evolved considerably since the current standards were adopted. This includes our knowledge of the behaviour and impact of air pollutants on human health. In particular, a publication by the Royal College of Physicians of Edinburgh in April 2023 recommended “air quality monitors should be placed at all Scottish city primary schools for a period of at least one year”. Fife Council has taken the decision to utilise existing modelling data and GIS school locations to rank the sites with the highest modelled data and monitoring is currently being undertaken at 5 of the schools using nitrogen dioxide diffusion tubes and portable air quality monitors (AQMesh). This project started in 2024 and progress will be discussed within subsequent Annual Progress Reports. Fife Council has also taken a proactive educational approach for anti- idling including a publicity campaign in 2023 and has also produced a dedicated webpage for people wishing to know more about wood burning stoves.

4. The Scottish Government is currently reviewing the CAFS2 strategy with the goal of establishing a long-term policy framework to replace the strategy once it expires. What practical steps can the Scottish Government set out in its new strategy to reduce nitrogen dioxide and fine particulate matter levels?

As mentioned above introducing a phased approach to adopting 2021 WHO objectives should be considered. Encouraging the development of air quality monitors that can accurately monitor the lower 2021 WHO objectives (in particular PM2.5) would also be helpful. We would also welcome stricter restrictions on the installation of wood burning stoves and biomass boilers as to ensure air quality is not impacted. Further research in the short term into the impacts of – and methods of addressing – indoor air pollution would also be considered beneficial, as would further research into source apportionment to allow interventions to be targeted effectively.

Regards

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