

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

Submission from Invica Industries Group, 1 July 2025

Please see below some high-level answers to the questions posed. I have also attached Invica Industries Group's (CPLs) 2021 CAFS2 submission which provides some further detail. I have also included the cost/benefit analysis and proof that smokeless solid fuels can be obtained all around Scotland. We would be more than happy to provide further evidence at the appropriate time.

- 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.**

Yes, we do. Tighten WHO limits will push society to find solutions to reduce pollution levels. One of the ways to reduce the current pollution levels in Scotland is to ban smoky coal and the sale of wet wood.

- 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?**

It remains clear that much more needs to be done to meet Scotland's air quality targets. The full and urgent implementation of CAFS2 (Cleaner Air for Scotland 2) is essential to drive the comprehensive action required. One key measure would be to ban the commercial sale of smoky coal and replace it with smokeless fuels — a change that could reduce PM2.5 emissions from solid fuels by over 60%, while still preserving the benefits of solid fuel heating for households.

- 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.**

We have conducted a cost benefit analysis if smoky coal is changed to smokeless fuels for the year 2022 (The latest year that we have data available). It shows that the reduction of PM2.5 pollution with the utilization of smokeless fuels would have a benefit equivalent to more than 7 million pounds.

- 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?

Scotland should ban the commercialization of smoky coal and replace it by smokeless fuels. This strategy will reduce the PM2.5 emissions in more than 60% for solid fuels and at the same time, the benefits of solid fuels heating are maintained. Some of these benefits are low cost compared with other domestic heating sources, extra heating during winter storms, reduction of peak electrical grid power (very important with the implementation of heat pumps), complementary heating during cold periods in winter when the heat pumps reduce their heat output, etc. It is important to notice that smokeless solid fuels are sold in all the regions of Scotland, including Highlands and Islands, and there are already roots to market.

Kind regards

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