

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

**Submission from NASUWT, the Teachers' Union, 27 June 2025**

The NASUWT is the largest UK-wide teachers' union representing teachers and school leaders in all sectors of education.

## **QUESTIONS POSED**

1. 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?
2. 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.
3. 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?

## **SPECIFIC COMMENTS**

NASUWT has given full support to the petition PE2123 and agrees that target pollution levels should be much lower than those we have in Scotland and be aligned to 2021 WHO guidelines.

Over 40,000 people die each year in the UK where the outdoor air they breathe is a major contributory factor. Thousands of people will also die because of occupational diseases caused by air pollution at work. Pollution arising from work and travel to work are health issues for which employers take little responsibility.

There is hardly any recognition of this in national and local authority strategies. This is an issue for workers and their families at all stages from before birth to old age and is particularly damaging to the growth and development of babies and children.

NASUWT has existing policy to call on Governments to inter alia:

- (i) Introduce a new Clean Air Act that enshrines the right to breathe clean air - It must set stringent legal limits for ambient air quality, which reflect WHO (World Health Organisation) guidelines. There should be recognition that air pollution is an occupational health issue. Employers must be required to make Environmental Impact Assessments on the pollution related to their work activities. They should have a duty to present strategies for minimising and eradicating pollutants within the workplace and in the wider community.
- (ii) Update Health and Safety Law - The COSHH (Control of Substances Hazardous to Health) Regulations and related guidance should be amended to reflect new research on indoor and outdoor air pollution. This includes amending Workplace Exposure Limits to place duties on employers to monitor and adopt control measures for diesel and other toxic vehicle emissions not currently covered by HSE (Health and Safety Executive) EH40.
- (iii) Ensure effective enforcement - Strict enforcement by relevant agencies of the occupational and environmental legislation with the power to hold public bodies and employers to account. Representatives of the trade union movement must have seats on the relevant agencies.
- (iv) Involve the workforce - Air quality measures for indoor and outdoor occupational air pollution must be subject to the consultation requirements of the SRSC (Safety Reps and Safety Committees) Regulations. Measures should cover both employees and others and

especially the needs of vulnerable occupants of buildings, including in particular children and young people. Employers should be required to raise awareness and support workforce training on risks and control measures. Workers may need access to independent advice on exposure levels and health effects.

- (v) Protect jobs - Government and employer clean air strategies will have implications for jobs and employment. The application of Just Transition principles, including consultation and negotiation with appropriate and industry unions, must include full equality impact assessments, to ensure positive and fair outcomes for all workers.
- (vi) Rapidly expand clean and inexpensive public transport systems alongside investment in active transport to increase levels of cycling and walking - Cleaning up air in the UK will require significant public expenditure. The Government should drive the policies to ensure that those least able to afford it are not expected to pick up the bill and to subsidise measures for less polluting forms of energy and transport, including affordable public transport. This will encourage more integrated and more active forms of transport.

Air pollution due to traffic etc. is also a major issue in some schools. The Union has also been campaigning for HEPA filters to remove pathogens, allergens and contaminants and make a better learning experience with reduced absence. It is likely that a filter would pay for itself very quickly by reducing absence rates, as well as improving learning<sup>1</sup>. There is a causal link between air pollution and pupil test results.<sup>2</sup>

Clean Air is a key priority for NASUWT as can be seen in the following STUC Congress and NASUWT Scotland Conference motions:

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<sup>1</sup> <https://www.nasuwt.org.uk/static/dcb0f1b1-fd38-4690-a306c9502205aa3b/Air-Filtration-Briefing.pdf>  
<https://www.nasuwt.org.uk/static/163af2a6-3e74-40ab-b14749acbc01cdc6/Air-Filtration-in-Schools-Research.pdf>

<sup>2</sup> [http://eprints.lse.ac.uk/65743/7/Roth\\_long\\_run\\_economic\\_consequences\\_published.pdf](http://eprints.lse.ac.uk/65743/7/Roth_long_run_economic_consequences_published.pdf)  
<https://www.nasuwt.org.uk/static/163af2a6-3e74-40ab-b14749acbc01cdc6/Air-Filtration-in-Schools-Research.pdf>

## STUC Congress 2024: Clean Air

Congress notes that the United Nations General Assembly has passed a historic resolution declaring that everyone on the planet has a right to a healthy environment, including clean air, water, and a stable climate.

Congress agrees that air pollution is damaging our health and increasing our risk of dying early.

Congress notes that:

- (i) children, older people, and people with chronic health problems are among the most susceptible to air pollution;
- (ii) gestation, infancy, and early childhood are vulnerable times as the body is growing and has immature immune systems;
- (iii) children spend a higher proportion of their time outdoors;
- (iv) our poorest children and adults live in areas of highest pollution thus exacerbating pre-existing health inequalities.

Congress further notes that research on air pollution points towards effects on growth, intelligence, development of the brain and coordination.

Congress therefore calls on the STUC General Council to support the Royal College of Physicians of Edinburgh recommendation that air quality monitors be placed at all Scottish city primary, secondary and ASN schools.

Congress agrees that air quality remains an ongoing concern for workers both outside and within their workplaces. Congress recognises that good ventilation has been acknowledged as a key mitigation against transmission of Covid-19 and similar respiratory viruses. Congress therefore mandates the STUC General Council to call for action to secure air filters in every classroom, office and workplace, acknowledging that:

- (a) the benefits extend beyond Covid-19, for example, decreasing CO<sub>2</sub> levels and air pollution have a positive impact on the ability to learn with research showing that cleaner indoor air improves cognition and productivity amongst children and adolescents;

(b) increasing ventilation, combined with the use of air filters and enhanced cleaning routines, reduces levels of general sickness absence, again improving outcomes and reducing costs.

#### 2024 Officers' motion - Ventilation and Clean Air

Conference agrees that air quality remains an on-going concern for workers both within and outwith their place of work.

Conference notes that ventilation of learning spaces in our schools has been acknowledged as a key mitigation in the prevention of transmission of SARS-Cov-2 and other airborne pathogens. Conference further notes that providing adequate ventilation indoors, proxy measured by the concentration of Carbon Dioxide (CO<sub>2</sub>) in the air, and reduction of air pollutants have a positive impact on the ability of pupils to learn, reduction in levels of sickness absence, improvement of educational outcomes and reduction of costs.

Conference mandates the Scotland Executive Council to campaign to:

- i. secure air filters in every learning space, office area and common area in all schools;
- ii. maintain pressure on Public Health Scotland (PHS) and the Scottish Government to promote the use of specific concentrations of CO<sub>2</sub> within schools to determine specific actions to increase ventilation;
- iii. reinforce the use of CO<sub>2</sub> monitors with employers and members via local authority Health and Safety Committees;
- iv. support the recommendation that air quality monitors are installed in Scotland's primary schools to assess levels of air pollution.

Indeed a joint letter with other organisations including ERCS was recently submitted to the Scottish Government<sup>3</sup>: Councillors, health professionals, teachers and charities have all united to call on the Scottish Government to cut air pollution from engine idling. Engine idling, leaving a vehicle's engine running while stationary, is

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<sup>3</sup> [https://www.ercs.scot/wp/wp-content/uploads/2025/03/Joint-letter-toSG-on-engine-idling\\_Mar25.pdf](https://www.ercs.scot/wp/wp-content/uploads/2025/03/Joint-letter-toSG-on-engine-idling_Mar25.pdf)

already prohibited in Scotland because it releases toxic exhaust fumes that are harmful to human health and the environment. Yet despite over 1,000 complaints of idling from members of the public since 2019, there has been a systemic failure to enforce the ban, according to data uncovered by the Environmental Rights Centre for Scotland (ERCS) and Asthma + Lung UK. There is extensive evidence linking vehicle emissions to diseases including lung cancer and asthma. Children, older people, pregnant women and people with existing health conditions are particularly vulnerable and exposed to toxic exhaust fumes at idling hotspots such as schools, hospitals and bus stops.

NASUWT has long recognised the urgent need for governments, businesses and the international community to collectively address the issues that have led to the current climate crisis. As we know, the climate crisis represents one of the greatest threats to the health, welfare and future life chances of our members and the children and young people they teach

If the issue of climate change is not prioritised, and decisive action is not taken swiftly through a global response, there will be disastrous consequences for the future of the planet and humanity. A key part of understanding the impact of climate change and rising global temperatures is the issue of climate justice. This looks at the human cost of the climate crisis and is recognition that the impact of climate change will not be borne equally. Many global communities, in particular in developing countries, will be disproportionately affected. The NASUWT is aware that many of our members, as well as the children and young people they teach, are concerned about their futures and that of the next generations and are therefore striving for long-term environmental sustainability.

Greater links need to be made too between educational outcomes, climate disadvantage alongside equality and socio-economic impacts. For example, the effects of extreme temperatures are even more striking when considering that each additional school day with a temperature in the 30s (°C) reduces pupil achievement by one sixth of a percent of a year's worth of learning. Disadvantaged pupils also suffer up to three times the impact of excessive temperatures than other pupils. The holistic approach needs to consider in the broadest sense the impact of poorer

attainment or the impact of the poverty related attainment gap growing on longer-term outcomes, including on climate change.

The NASUWT is writing to stress that insufficient progress has been made in reducing nitrogen dioxide and fine particulate matter in Scotland, the impact is being felt most strongly by some of our most vulnerable community members, including children and young people, and Scottish Government must move with greater speed and urgency to affect change, including by updating air quality standards in Scotland to align with 2021 World Health Organisation guidelines.

For further information, please contact:

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