



The Scottish Parliament
Pàrlamaid na h-Alba

Net Zero, Energy and Transport Committee

Gillian Martin MSP
Cabinet Secretary for Climate Action
and Energy
Scottish Government

8 October 2025

Dear Gillian

Petition PE2123: Air Quality Standards

On 16 September, the Committee considered Petition PE2123, lodged by Asthma + Lung UK Scotland. The petition calls on the Scottish Parliament to urge the Scottish Government to amend the Air Quality Standards (Scotland) Regulations 2010 by adopting new limit values for nitrogen dioxide (NO₂) and fine particulate matter (PM_{2.5}) in line with the World Health Organisation's (WHO) 2021 guidelines.

At that meeting, the Committee agreed to close the petition, but in doing so agreed to write to the Scottish Government to highlight issues raised when we gathered evidence from stakeholders and experts earlier this year. This is available on the Committee's [website](#), and a short summary of key points is set out below.

Support for aligning with the World Health Organisation's 2021 guidelines

Most stakeholders strongly supported amending the 2010 Regulations to align with the 2021 guidelines. Public-health considerations were the primary driver, coupled with a desire for a clear, enforceable legal framework and alignment with evolving EU standards. Some stakeholders recognised a pragmatic case for taking a phased approach but with a commitment to achieving alignment in the near future.

Public Health Rationale

Many stakeholders framed alignment with WHO air quality guidelines as a public-health imperative. Public Health Scotland welcomed further efforts to reduce emissions, noting the guidelines are evidence-based rather than determined by achievability, and urged attention to vulnerable and marginalised groups. The Environmental Rights Centre for Scotland (ERCS) described the WHO guidance as "the best available scientific evidence," linking stronger air quality standards to improved health outcomes. Professor Campbell Gemmell warned that delays in updating statutory standards risk further harm, while Sustrans underlined that poor air quality remains "the largest environmental risk to public health in the UK."

Contact: Net Zero, Energy and Transport Committee, The Scottish Parliament, Edinburgh, EH99 1SP. Email netzero@parliament.scot. We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

Alignment with European Standards

Several stakeholders stressed the importance of keeping pace with developments at the EU level. They pointed to the revised EU Ambient Air Quality Directive, which came into force in December 2024, noting that it brings EU limit values closer to the WHO guidelines and sets more stringent targets for 2030 than those currently in place in Scotland.

Current Concentrations and Progress

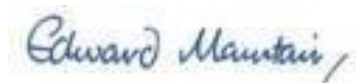
Since the Committee last reviewed progress on reducing nitrogen dioxide and fine particulate matter, Asthma + Lung UK Scotland has published two reports examining these pollutants, focusing on transport and domestic burning. Analysis of 2023 Local Authority Annual Reports found that all automatic monitoring stations with data capture above 50% recorded levels below statutory limits. However, against the WHO 2021 Air Quality Guidelines, only 70.6% of sites met the target for nitrogen dioxide (20 µg/m³) and 42.7% met the target for fine particulate matter (5 µg/m³). Updated analysis using 2024 data shows improvement for NO₂, with 79.5% of sites now meeting the WHO guideline, but a decline for fine particulate matter, with only 10% of sites below 5 µg/m³ compared to almost half in 2023.

Review of the Cleaner Air for Scotland (CAFS2) strategy and longer-term Strategy

Stakeholders urged the CAFS2 review to embed WHO guideline limits in law and strengthen implementation through stronger funding, improved monitoring, enhanced public alerts, strategies to reach vulnerable groups, and targeted action across sectors. Transport was seen as especially important, with accelerated transport decarbonisation, Low Emission Zones, and cheaper public transport all mentioned as issues the strategy should cover. The Royal College of Physicians Edinburgh, ERCS and others called for public engagement campaigns, clearer real-time data and citizen-science initiatives to build understanding and support for behaviour change.

Taken together, the evidence gathered presents a strong case for strengthening Scotland's legal framework as part of the CAFS2 review and the development of a longer-term strategy. Although the petition is now formally closed, the Committee remains interested in this matter and in monitoring progress in strengthening air quality standards, as we expect our successor Committee will be in the next Parliamentary session. The Committee would welcome updates on how this work is progressing during the remainder of the parliamentary session.

Yours sincerely,



Edward Mountain MSP

Convener

Net Zero, Energy and Transport Committee