

SEPA welcomes the opportunity to provide written views to the Scottish Parliament's Net Zero, Energy and Transport Committee on wider air quality issues in relation to The Scottish Government's Cleaner Air for Scotland (CAFS2) strategy (in advance of the Scottish Government Improvement Plan being laid). Please find enclosed views from SEPA in response to the specific areas highlighted by the Committee in their invitation of 10 February 2023.

CAFS2 priority areas for action:

- **Effectiveness of the strategy's aims and actions.**
- **Funding, resources and governance structures for achieving the strategy's aims and actions.**

SEPA supports the Scottish Government in the development of air quality policy, guidance and legislation, provision of scientific evidence and technical advice, provision of communications and public engagement. SEPA has been a key partner in the development and delivery of the Scottish Government's strategies [Cleaner Air for Scotland – The Road to a Healthier Future](#) (CAFS) and [Cleaner Air for Scotland 2 – Towards a Better Place for Everyone](#) (CAFS2) and their air quality policy aspirations, since the initial process began in 2012.

SEPA is one of the main delivery agencies for CAFS2 and has responsibility for leading or supporting the delivery of actions in nine of the ten priority sectors contained in the strategy. SEPA is therefore integral to ensuring the success of CAFS2 and the actions contained in its [delivery plan](#). In particular, SEPA is tasked with the following areas of work under CAFS2:

- Utilising its sector plan approach to encourage businesses to go beyond compliance to achieve further reduction in air pollutants and greenhouse gas emissions.
- Assessing the currently regulatory regimes for gaps, activities which may need to be regulated and appropriateness of qualifying thresholds.
- Working with the agricultural industry to develop a voluntary code of good agricultural practice for improving air quality in Scotland, sharing best practice and raising awareness of greenhouse gases and ammonia, and actions that farmers and crofters can take to minimise their environmental impact while improving efficiency.
- Continuing work to implement Scotland's Low Emission Zones (LEZs).
- Continuing to improve air pollution data and evidence through development of new data collection and storage methods, modelling and tools and reporting capabilities.
- Developing guidance on co-related aspects to air pollution such as noise and non-industrial emissions.
- With Scottish Government conducting a review of the current Local Air Quality Management (LAQM) system to update guidance and improve the methods for assessment and reporting.
- Playing a key role in the governance of the CAFS2 process.

SEPA is supportive of the aims of the CAFS2 strategy, and the actions contained within it, to help secure the Scottish Government's vision of Scotland having the best air quality in Europe. Significant progress has been made in implementing measures to reduce air pollution, improve air quality and achieve co-benefits across a range of related policy areas since the original CAFS strategy was published in 2015, and the aspiration and actions contained in CAFS2 build upon this strong foundation in a realistic, proportionate and achievable way.

SEPA is content that the governance structure which supports CAFS2 is effective and provides a suitable mechanism to ensure that the actions contained within CAFS2 are delivered appropriately and within the stated timescales. Progress with delivery against

CAFS2 is assessed and reported on at ministerial level on an annual basis and where necessary review of the status, or addition, of actions can be carried out.

Additionally, there is a specific action to initiate a review on progress with implementing the overall CAFS2 strategy during 2024, with a view to having a further version of Scotland's air quality strategy in place by the end of 2025. This governance structure and the wider process put in place since 2015 ensures that delivery of CAFS2 (and any subsequent CAFS strategies) is subject to a constant process of review, adaptation and updating as new evidence on the impacts of air pollution and air quality emerges, and allows future emerging policy in other areas (such as public health, climate change, transport, place-making, industry and business, etc.) to be aligned and maximised to achieve multiple benefits and minimise possible policy conflicts or disbenefits.

Progress towards delivery of Scotland's low emission zones in Glasgow, Edinburgh, Dundee and Aberdeen, including:

- **The scale, ambition and proposed implementation of Scotland's LEZs.**
- **Implementation of the bus low emission zone in Glasgow.**
- **Monitoring and enforcement of LEZs.**

The introduction of Scotland's Low Emission Zones (LEZs) in May 2022 marked an important step towards tackling poor air quality in Scotland's four largest cities (Glasgow, Edinburgh, Aberdeen and Dundee). The LEZs will help improve air quality by discouraging all types of non-compliant vehicle from entering the zones, with penalty charges following an initial grace period.

The design of each LEZ was finalised by close partnership working between SEPA, the four local authorities, Transport Scotland and the major transport operators within the cities. The initial stages involved collecting detailed traffic data to understand the different types of vehicles that travelled through each city, including information about their age and emissions of air pollutants. Computer models were then used to estimate how much air quality could be improved by excluding older vehicles that tend to emit the most air pollution. The models also simulated how traffic movements might change following implementation of the LEZ. This provided key evidence that supported the design of the LEZ boundary and the types of vehicles that would be permitted access into the zones.

Based on evidence from SEPA's air quality models, a first phase of Glasgow's LEZ was introduced in 2018 for local bus services only. The proportion of journeys inside the LEZ made by the lowest-emitting buses increased by 20% each year, now reaching full compliance in 2022/23. This has been achieved using technology to reduce emissions from existing buses and by replacing older buses with new diesel and electric ones. SEPA provided bus operators with online bus data tools to help them maximise investments in the cleanest buses within the LEZ and allow routing of the cleanest buses on routes where air quality required the most improvement. Air quality along key bus routes inside the Glasgow LEZ is now showing evidence of improvement.

SEPA are now working with the local authorities to collect the latest information about traffic in each LEZ, in advance of their full implementation. This marks the beginning of a period of LEZ monitoring where changes in the vehicle fleet on key routes will be regularly assessed. SEPA will explore collaboration with academic partners to report on changes to air quality that can be linked to improvements in the vehicle fleet. SEPA will also continue to provide ongoing support to the partner organisations involved in the delivery of Scotland's LEZs.

Scotland's compliance with international standards on air quality:

- **Scotland's performance in meeting international guidelines regarding limit values for air pollutants.**
- **Scotland's performance compared to other European countries.**
- **International examples of best practice and how this could be applied in Scotland.**

The [independently led review of CAFS which reported in 2019](#) found that Scotland is performing well by UK, European and global comparison, with both ambient concentrations and mass emissions of the main air pollutants largely continuing to fall (with the exception of ammonia).

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets objectives for a series of air pollutants to be met within the UK. The scientific basis, the objectives set and provisions contained within the strategy are closely associated with the corresponding limit values set by European Union (EU) Directives. The provisions for some pollutants differ from those in the Directives; however, all the objectives are at least as stringent as the corresponding limit values applicable within the EU. Additionally, for some pollutants (such as PM_{10/2.5}), Scotland has adopted annual mean objectives which are significantly more stringent than the rest of the UK (and Europe) and implement the World Health Organisation (WHO) guidelines from 2005 and interim steps for the 2021 guidelines.

Provisional 2022 data from the network of Scottish air quality monitoring stations has shown that for these sites the legal air quality objectives have been met (for the first year outside of lockdown periods). The data is expected to be confirmed in March 2023 (and may be subject to change), but shows continued improvements are being achieved in local air quality across Scotland.