



c/o 1st Floor
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22nd January 2007

Claire Dodd
Air, Noise and Nuisance Team
Scottish Executive
1-G Victoria Quay
Edinburgh
EH6 6QQ

Dear Ms Dodd

Consultation on Proposed Air Quality Standards (Scotland) Regulations 2007

The UK Environmental Law Association (UKELA) is the UK forum which aims to make the law work for a better environment and to improve understanding and awareness of environmental law. Its members are involved in the practice, study or formulation of Environmental Law in the UK and the European Union. It attracts both lawyers and non lawyers and has a broad membership.

The UKELA Scots Law Working Party, which I convene, focuses on environmental law in Scotland. The Working Party has considered the above consultation paper and has the following comments.

We welcome the decision to use the opportunity of implementing the fourth "daughter Directive" to produce a consolidated version of the new and existing legislation. We would like to see consolidation in other areas of environmental law. Far too much of that law is in a fragmented state, with the statutory provisions scattered between different measures and subject to multiple amendments. This can make tracing the current state of the law a major task. This makes life difficult for everyone who has to use it, which inevitably increases costs all round. It also has an impact on compliance, since it is sometimes difficult without expert advice to understand what the law requires. We strongly support the approach taken here and encourage the Executive to do more to produce consolidated versions of environmental legislation.

Since UKELA did not receive a copy of the consultation direct, I should be grateful if you would add my details to you and your colleagues' list of standard consultees. I should be particularly grateful if you were able to add those details to a central list for all environment consultations: thus far, despite my best efforts, it has not been possible to achieve this.

Please do not hesitate to contact me if you wish to discuss any of the above or if you would like any further information about UKELA and the Scots Law Working Party.

Yours faithfully

Gordon McCreath
Convenor - UKELA Scots Law Working Party