

# **Submission by Children's Right Over Flights Campaign to Public Consultation on the Department of Transport Statement of Strategy 2025- 2028**



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In response to Department of Transport consultation on Transport Statement of Strategy:  
<https://www.gov.ie/en/consultation/ccf92-public-consultation-on-the-department-of-transport-statement-of-strategy-2025-2028/>

Current Transport Statement of Strategy 2023-2025:  
<https://www.gov.ie/pdf/?file=https://assets.gov.ie/270009/1da3d2bf-18e1-4f4c-be73-863aa9449a46.pdf>

Submitted to [StatementofStrategy@transport.gov.ie](mailto:StatementofStrategy@transport.gov.ie)  
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## **Introduction**

Children's Rights Over Flights is a campaign by parents, grandparents, and other concerned people, calling for children's rights in the context of the climate emergency to be prioritised over aviation growth. We are volunteers who have come together due to our huge concern on this issue, and have worked together as a group on this submission.

While this submission will focus primarily on fair and responsible aviation-related policies, we would assert that our key points regarding the need to prioritise urgent climate mitigation obligations, and children's fundamental rights in this regard, apply to the Statement of Strategy overall.

## **Assessment of existing Transport Statement of Strategy (TSOS)**

### **Inadequate emphasis and response to the climate emergency generally**

The current Government Transport Statement of Strategy 2023-2025 (TSOS) does not adequately address the State-declared climate emergency. The next Strategy must fully reflect the reality of the escalating climate emergency, and the State's national and international climate obligations. As per the 2025 High Court judgement in the Coolglas wind farm case, Section 15 of the Climate Act -“ underlines and reflects the need for “rapid, far-reaching and unprecedented changes to all aspects of society and the economy”.<sup>1</sup> In this regard we assert the next Statement of Strategy must be far more ambitious, urgent and transformative in cutting GHG emissions, especially fossil fuel use, and climate mitigation efforts must be prioritised across all public bodies covered by the Strategy. In this context, we also propose that the next Strategy mission statement should explicitly refer to protecting human health and contributing to a safer future for all in the State, and especially children and future generations.

### **Failure to consider the rights and best interests of children**

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) is rightly acknowledged within the current Strategy Statement, but the UN Convention on the Rights of the Child (UNCRC) is not. While this submission primarily concerns aviation and climate impacts, we would highlight that children are a key stakeholder in relation to this Strategy overall at a number of levels - in relation to differentiated health and safety risks as regards air pollution for example, but also in relation to the climate emergency. This is additionally pertinent to the Department's Public Sector Human Rights and Equality Duty. Children and young people should

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<sup>1</sup> Coolglass Windfarm Ltd - v - An Bord Pleanala  
[https://www.courts.ie/view/Judgments/c6e01981-1045-4571-af0c-06d260290823/ef6f4957-3e77-41bb-945e-ca3adf49b287/2025\\_IEHC\\_1.pdf](https://www.courts.ie/view/Judgments/c6e01981-1045-4571-af0c-06d260290823/ef6f4957-3e77-41bb-945e-ca3adf49b287/2025_IEHC_1.pdf)

be consulted in the development and implementation of this Strategy and their best interests must be a primary consideration throughout its development. As per General Comment no. 26 of the UN Committee on the Rights of the Child:

*Environmental decisions generally concern children, and the best interests of the child shall be a primary consideration in the adoption and implementation of environmental decisions, including.. plans, strategies...Where an environmental decision may have a significant impact on children, conducting a more detailed procedure to assess and determine children's best interests that provides opportunities for their effective and meaningful participation, is appropriate.<sup>2</sup>*

Pertinent to the drafting of this Strategy, and particularly in relation to the imperative of reducing emissions immediately across all transport sectors including aviation, is the following statement from the aforementioned General Comment:

*"States must take deliberate, specific and targeted steps towards achieving the full and effective enjoyment of children's rights related to the environment, including their right to a healthy environment, including through the development of legislation, policies, strategies or plans that are science-based and consistent with relevant international guidelines related to environmental health and safety and by refraining from taking retrogressive measures that are less protective of children."<sup>3</sup>*

The emphasis within the existing TSOS on enhancing international connectivity in relation to short-term economic considerations, has contributed to a failure to tackle international aviation emissions and instead there has been record levels of flight traffic and aviation fossil fuel use in Ireland. According to the Sustainable Energy Authority of Ireland (SEAI) "Ireland used 1.36 billion litres of jet kerosene in 2023 - the highest annual demand ever recorded and up 12.7% on the previous year."<sup>4</sup> We would assert these are clearly 'retrogressive measures that are less protective of children'. In this light, and given the unambiguous recent call from the UNEP for a "global mobilisation on a scale and pace never seen before, starting right now" to curb emissions and avoid climate catastrophe, any new Strategy goals or measures not leading to emissions cuts across **all** sectors are unacceptable. Furthermore, any which would lead to increased fossil fuel use, such as major increases to flights from Dublin Airport, would be insupportable.

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<sup>2</sup><https://www.ohchr.org/en/documents/general-comments-and-recommendations/crccgc26-general-comment-no-26-2023-childrens-rights>

<sup>3</sup> Ibid

<sup>4</sup> <https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance/>

## **Aviation in relation to TSOS goals and national climate targets**

One of the "Target Outcomes" in the existing TSOS is - "We aim to increase the connectivity of Ireland to the world". Strategic Goal 1 (Connectivity) in the current TSOS, is "ensuring Ireland's international connectivity which is key to maintaining our global economic competitiveness". These goal statements firstly imply that economic competitiveness in itself, rather than a well-being economy for example, should be a primary goal, and secondly could be used to attempt justification of aviation sector growth on the basis of its perceived contribution to "connectivity to the world", while ignoring its harmful contribution to global warming (and related colossal economic consequences).<sup>5</sup>,

The TSOS does not address the ability of Ireland to lead by example in terms of reducing aviation emissions, or the incompatibility of expanding aviation in Ireland with Paris Agreement goals. The TSOS does not address the exclusion of international aviation from national climate targets nor propose a mechanism to include them.

The UNFCCC Secretariat has stated in its 2024 synthesis report that the next Nationally Determined Contributions must include "ambitious new emissions targets that are economy-wide and cover all GHGs." Incorporation of international aviation emissions into national climate plans is clearly provided for under the Paris Agreement. A briefing by Transport and Environment states that: "Parties should undertake "economy-wide absolute emission reduction targets" to this end. All aviation and shipping emissions are deeply integrated into countries' economies, so clearly fall within this definition of emissions. Equally, there is no definition of "economy-wide" that excludes international shipping and aviation and there are no other relevant treaty obligations that exclude international aviation and shipping emissions from the obligations imposed by the Paris Agreement".

Legal analysis by Opportunity Green, further to the 2024 advisory opinion of the International Tribunal on the Law of the Sea (ITLOS), highlights that aviation, along with shipping emissions should be meaningfully included in national climate action plans and pointed to the stringent due diligence obligations of States.<sup>6</sup> They especially note the significance of these national obligations where international efforts such as those of the ICAO fall short of the standard required.

## **Assessment of existing TSOS as regards aviation**

**No aviation review done:** The review of the 2015 National Aviation Policy as promised in the TSOS has not occurred.

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<sup>5</sup><https://www.esri.ie/publications/climate-change-impacts-and-associated-economic-costs-in-ireland>

<sup>6</sup> <https://www.opportunitygreen.org/publication-itlos-advisory-opinion>

**“Alternative aviation fuels” and need to reduce aviation:** While the TSOS supports the development of alternative aviation fuels, such policy does not address the negative impacts of biofuel-based aviation fuels (detailed in the rationale section of our submission) and does not acknowledge that development of alternatives based on green hydrogen and electrification of aviation are far from market readiness, and that aviation must be reduced in the meantime for a safe climate future.

**Alternative overseas travel:** The only mention of ferry travel in the TSOS is a brief mention of accommodating foot passengers without cars. While this is needed, it is needed as part of a comprehensive land-and-sea international transport policy.

**EU and International mechanisms:** The TSOS expresses support for EU and international action to reduce aviation emissions, in line with the aims of the Paris Agreement and the UN Framework Convention on Climate Change (UNFCCC). It mentions the “Re-fuel EU” scheme to expand use of “sustainable aviation fuel”, but this should not be used to justify continued expansion of aviation. The TSOS does not give adequate direction for the future of how the EU Emissions Trading Scheme (ETS) can be leveraged to reduce emissions from aviation.

## **Summary of proposals for new TSOS**

We call for the following commitments within the next Strategy:

- **Set clear and binding national climate targets for aviation:** Insert clear climate-based mandates and targets into the terms of reference and statutory responsibilities of all relevant bodies such as the Irish Aviation Authority and the airport authorities, and include international aviation in national binding climate targets.
- **Centre children’s rights and best interests** , especially in the context of climate change and adhere to the obligations set out in the UNCRC General Comment no. 26 in this regard. Children and young people should be consulted in relation to the Strategy, and especially regarding the context of the climate emergency.
- **Develop International Transport Policy:** Develop a comprehensive international transport policy, which covers both aviation and alternative international travel modes, and which responsibly limits aviation while strengthening other international transport modes, by:
  - ensuring the fares of international transport combining ferry with public transport are affordable and lower than the costs of flying,

- improving convenience for people travelling overland internationally, through working with Britain and Continental Europe to ensure seamless connections, ticketing, timetabling and accessibility of transport between Ireland and continental Europe,
- implementing policy to ensure full access by foot passengers, cyclists and persons with disabilities, to all passenger ferry services, and
- investing in research and development for the future of non fossil-fueled land-and-sea international transport.

- **Clear and fair strategies to reduce aviation emissions:** Implement a program of declining limits on total emissions attributable to flights, in line with climate science, and including all Irish airports. Strategies should include:

- **Capping airport flights**, including enforcement of the Dublin Airport passenger cap, ensuring there is no increase in this cap, and review of caps downwards to ensure emissions reductions in line with climate obligations.
- **Taxation of aviation fossil fuel** to at least a level similar to that of fossil fuel for land transport, and an end to all tax exemptions or subsidies for jet kerosene.
- **Related regulation of the aviation industry** including a ban on **aviation advertising**, including broadcast media sponsorship; limits or ban of **air freight** transport into Ireland of non-emergency items transportable by ship; and ban on low-occupancy **private jet** use (except in emergencies).

## Proposed TSOS commitments at international and EU level

We call on the next transport strategy to commit to the following aviation-related Government actions at international and EU level:

- **Meaningful action at EU and international levels to reduce aviation emissions.** The current UN CORSIA scheme is not fit for purpose. CORSIA allows offsetting of fossil fuel emissions through land use or forestry-based offsetting schemes, which are highly problematic on multiple fronts. Fossil fuel emissions need to be reduced directly, not “offset” in this way.<sup>7</sup>

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<sup>7</sup><https://carbonmarketwatch.org/2024/03/27/corsia-hot-air-carbon-credits-cannot-offset-polluting-planes/>

- **Remove jet kerosene tax exemption in the EU:** Ensure that jet kerosene tax exemption is abolished EU-wide as in commitments made in 2021 in the Fit For 55 package, and that the abolition of the exemption is not postponed.
- **Make the EU Emissions Trading Scheme (ETS) more effective** in reducing aviation emissions and emissions generally by ensuring
  - **No free permits:** airlines should no longer be allocated “free” emission permits but must pay for all permits,
  - **Steep reductions in permits:** the total quantity of permits issued should decrease steeply, in line with climate targets,
  - **Include cargo/freight:** ETS should be applied to cargo-only flights as well as passenger flights,
  - **Include outside EEA:** ETS should apply to flights outside the European Economic Area (EEA) as well as flights inside the EEA
  - **Include all climate-related emissions:** ETS should include the substantial non-CO2 climate effects of aviation as well as CO2 emissions.

## Rationale

**Expanding aviation is incompatible with a stable climate for our children.** There is currently no scalable pathway to climate-safe aviation without substantial decreases in supply and demand.<sup>8</sup> A 2024 report by European advocates for clean transport and energy, *Transport and Environment*, concludes that increasing passenger air traffic is simply irreconcilable with European climate goals, and that mitigation ideas such as Sustainable Aviation Fuel “are only a viable solution without exponentially growing levels of traffic”.<sup>9</sup> Aviation has a huge effect on global warming due to the huge quantity of emissions involved in every flight, and the fact they are emitted high in the atmosphere (contrails), which makes them even more damaging.<sup>10</sup> The world needs to reduce aviation, not expand it, to protect ourselves and our children from worsening climate breakdown.<sup>11</sup>

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<sup>8</sup><https://www.theguardian.com/environment/2024/feb/09/biggest-fossil-fuel-emissions-shipping-plane-manufacturing>

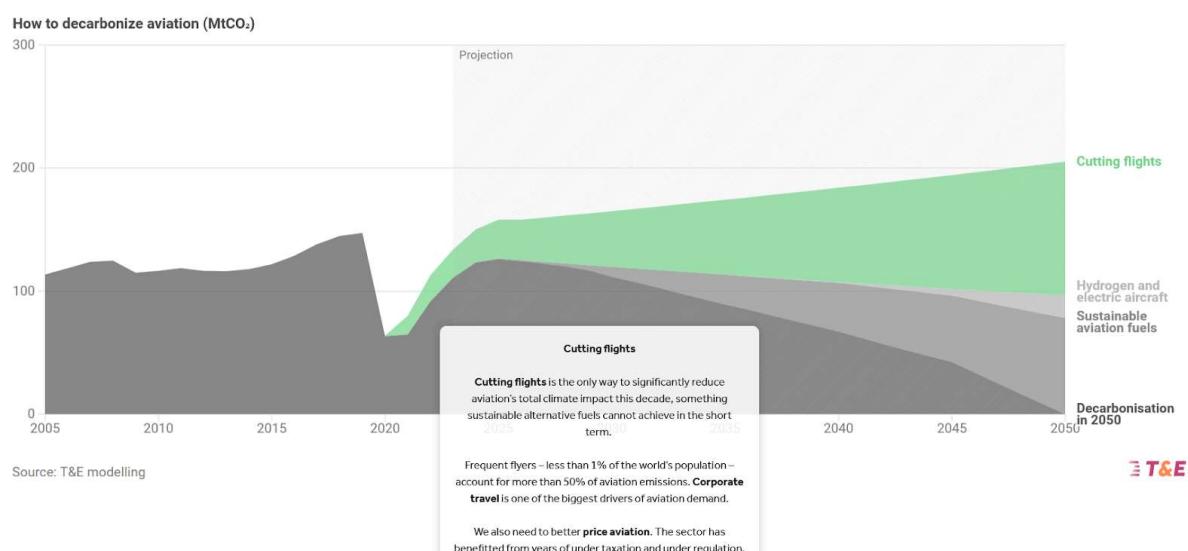
<sup>9</sup><https://www.transportenvironment.org/articles/aviation-industry-plans-for-growth-irreconcilable-with-europes-climate-goals>.

<sup>10</sup><https://www.opportunitygreen.org/publication-controlling-contrails-lowering-climate-impact-of-aviation>

<sup>11</sup> <https://www.unicef.org/reports/threat-to-progress>

The idea of “Sustainable Aviation Fuel” (SAF) will not allow aviation to expand while addressing the climate crisis - it takes massive amounts of land and resources to produce small amounts of SAF, much of which is, directly or indirectly, palm oil from tropical deforestation. Hydrogen or electric planes will not be ready technologically for decades. As regards purported aviation energy efficiency developments - the Climate Change Advisory Council highlighted within its ‘Annual Review 2024 -Transport’ that - “Growth in the demand for aviation has outstripped energy efficiency improvements”.<sup>12</sup> Furthermore, 2024 research by the Energy Modelling and Research Group at UCC indicates that “aviation emissions threaten to disproportionately deplete Ireland’s carbon budget”, potentially consuming up to 40% by 2050 if growth continues at current trajectories.<sup>13</sup>

The *only* way to reduce aviation pollution within the timeframe we need to avoid climate breakdowns is to **reduce flights**.



Source:<sup>14</sup>

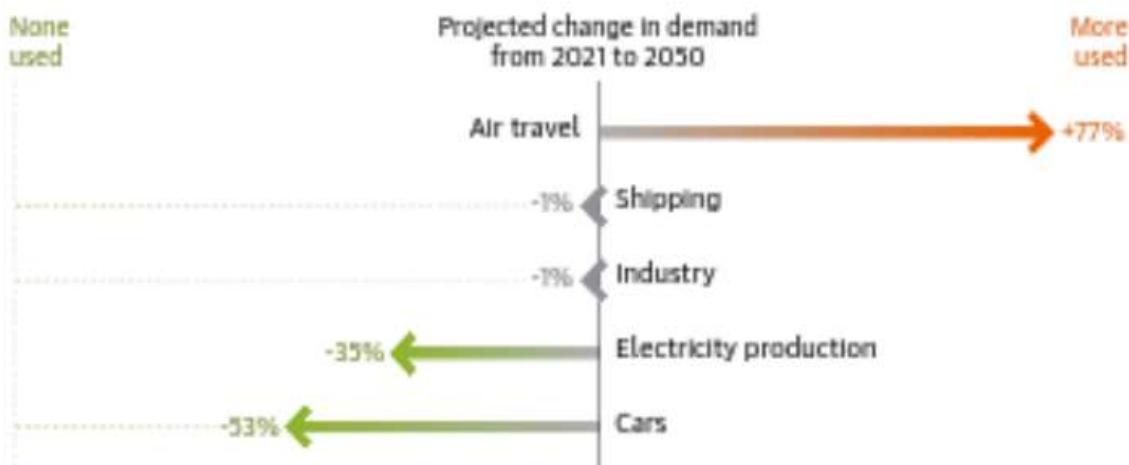
Other sectors are decreasing emissions, whereas if aviation continues with business-as-usual, aviation industry emissions are projected to continue to grow at very high rates.

<sup>12</sup> <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/AR2024-Transport-final.pdf>

<sup>13</sup> ‘Are emissions from aviation a blind spot in Ireland’s Policy Goals?’ (presentation) Energy Policy and Modelling Group, UCC 2024

<sup>14</sup> <https://www.transportenvironment.org/state-of-transport/aviation>

## In some sectors, fossil fuel demand isn't decreasing enough



Guardian graphic. Source: Rhodium Group analysis of global fossil fuel demand

Source: <sup>15</sup>

During the COVID pandemic, it was shown that reducing flights dramatically is very possible. It just means treating the climate emergency as the emergency it is, which is how the pandemic was treated.

### The justice implications of aviation are stark.

Only approximately 6% of people in the world fly in a single year<sup>16</sup>. While just one return transatlantic flight accounts for a climate impact equivalent to 3.2 tonnes of CO2 per passenger, an average person in Uganda emits just 1.1 tonne of greenhouse gasses in a whole year<sup>17</sup>. The livelihoods and liveable climate future of people who do not fly at all or fly very little are being destroyed by the relentless efforts to expand fossil-fueled industries, such as aviation.

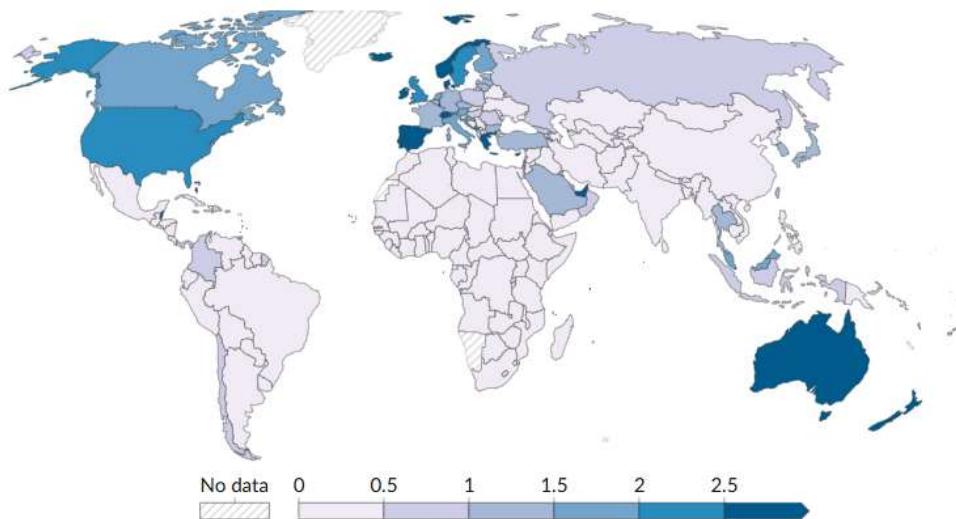
<sup>15</sup><https://www.theguardian.com/environment/2024/feb/09/biggest-fossil-fuel-emissions-shipping-plane-manufacturing>

<sup>16</sup><https://www.smithsonianmag.com/air-space-magazine/how-much-worlds-population-has-flown-airplane-180957719/>

<sup>17</sup>[https://stay-grounded.org/?#gf\\_1](https://stay-grounded.org/?#gf_1)

## Number of air travel trips per capita, 2019

Our World  
in Data



Data source: Airbus (2019)

OurWorldinData.org/transport | CC BY

Note: The allocation of air travel trips to each country is based on the number of passengers originating from that respective country.

Source: <sup>18</sup>

While fossil fuel used by household and domestic transport is taxed, jet fuel is exempt from tax.<sup>19</sup>

## Ireland needs to fulfil its climate obligations

According to the Sustainable Energy Authority of Ireland (SEAI) "Ireland used 1.36 billion litres of jet kerosene in 2023 - the highest annual demand ever recorded and up 12.7% on the previous year."<sup>20</sup> The transport sector is a large (40% in 2022), and growing, part of Ireland's fossil fuel emissions problem. And, within transport, the sector that has contributed most to the increase since 2012 has been aviation.<sup>21</sup>

<sup>18</sup> <https://ourworldindata.org/grapher/air-trips-per-capita?time=2019>

<sup>19</sup> <https://m.independent.ie/irish-news/unfair-jet-fuel-is-exempt-from-carbon-tax-while-households-suffer-says-expert/a1559163211.html>

<sup>20</sup> <https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance/>

<sup>21</sup> <https://www.seai.ie/data-and-insights/seai-statistics/co2>

## Equivalent greenhouse gas pollution

| Flight  | Car  | Public transport   |
|---|--|--|
| <b><u>1 flight Dublin-London</u></b><br>return, per passenger   | = <b><u>4 months</u></b> of Irish car use, per person  | = <b><u>4 years</u></b> of Irish public transport use, per person  |
| <b><u>1 flight Dublin New-York</u></b><br>return, per passenger | = <b><u>1.5 years</u></b> of Irish car use, per person | = <b><u>20 years</u></b> of Irish public transport use, per person |

Full calculations and sources <https://docs.google.com/spreadsheets/d/1iG8UQ1ZQ-85vEqDGmVFQ95cTzEcF5Lnom1n3JIHPtws>  
Flight data: <https://co2.myclimate.org> <https://www.carboncare.org/en/co2-emissions-calculator>  
CO2 and energy data in Ireland: <https://www.seai.ie/data-and-insights/>

### Sources:<sup>22</sup>

The vast majority of passenger flights from Ireland are to Europe (84%), and the UK is by far the leading destination, followed by Spain, both of which are accessible by ferry. The Dublin–London air route is the busiest air route in Europe, and the 2nd busiest international route in the world.<sup>23</sup>

As well as passenger air traffic, increased demand for air freight is generated through online retailers such as ‘fast fashion’ companies Shein and Temu, who fulfil orders via air-freight rather than shipping. There is huge expansion in planes flying freight-only<sup>24</sup>, mostly through consumers ordering online directly from such far-away online retailers. Where products are air-freighted rather than shipped, the pollution impact is 40% greater.<sup>25</sup>

### Aviation advertising drives growth of aviation emissions

Ongoing advertising of flight-based travel and long-distance online retailers has fueled huge growth in aviation pollution, and other jurisdictions have banned aviation advertising alongside other high carbon products<sup>26 27</sup>

<sup>22</sup> Full calculations and sources

<https://docs.google.com/spreadsheets/d/1iG8UQ1ZQ-85vEqDGmVFQ95cTzEcF5Lnom1n3JIHPtws>  
(compiled by Elaine Baker)

Flight data: <https://co2.myclimate.org> <https://www.carboncare.org/en/co2-emissions-calculator>

CO2 and energy data in Ireland: <https://www.seai.ie/data-and-insights/>

<sup>23</sup><https://www.gov.ie/en/publication/77ebec-irelands-action-plan-for-aviation-emissions-reduction/>

<sup>24</sup><https://www.theguardian.com/environment/article/2024/jun/26/air-freight-greenhouse-gas-emissions-increase-post-pandemic-economy>

<sup>25</sup> <https://www.volts.wtf/p/fashions-climate-impact-and-how-to>

<sup>26</sup> “Badvertising” - book by Andrew Simms and Leo Murray, and.

<https://www.greenpeace.org/eu-unit/issues/climate-energy/46060/ads-for-cars-and-flights-could-cause-twice-as-much-co2-as-spain/>

<sup>27</sup><https://theconversation.com/many-cities-are-banning-ads-for-airlines-suvs-and-fossil-fuels-and-yours-could-be-next-251322>

## Aviation and tourism

The aviation industry claims that the Irish tourism industry will suffer if aviation is curbed. However, significant money flows out of the country by people in Ireland flying abroad, in comparison to money flowing into the country through inward tourism. In 2023, according to the Central Statistics Office, the total estimated expenditure of visitors to Ireland was €7.3 billion. In the same year, total expenditure on outbound overnight trips amounted to \$12.9 billion.<sup>28</sup>

## Need for science-based strategy and due weight to the imperative of protecting children from climate harm

Children's Rights Over Flights is a campaign by parents, grandparents, and other concerned people, calling for children's rights in the context of climate change to be prioritised over aviation growth. We have been especially dismayed that the imperative of urgent climate action to protect children from climate harm, does not appear to have been given due weight or consideration in relation to the proposed removal of the Dublin Airport passenger cap. We are volunteers who have come together due to our huge concern on this issue, and have worked as a group on this submission. We have carefully researched and referenced our statements with reputable sources, and base our arguments on well-founded climate science. Given the prominent and frequent campaigning by sectoral business interests in support of aviation expansion in Ireland, most especially concerning the Dublin Airport passenger cap, we would also reinforce the importance that the climate action required by this Strategy must be "science-based and consistent with relevant international guidelines relevant to environmental health and safety and by refraining from taking retrogressive measures that are less protective of children".

## Conclusion

We urge that the next Transport Statement of Strategy is appropriately urgent and responsive to the climate crisis and the rights of children to a safe climate future, across all of the transport sector. This must include the aviation sector, to address its disproportionate, unjust and inequitable climate impact.

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<sup>28</sup> UK analysis showing that stemming the outgoing economic flows of outgoing tourism outweighs potentially lower incoming tourism revenue  
<https://neweconomics.org/2023/07/losing-altitude#:~:text=The%20environmental%20downsides%20f%20growth,pace%20of%20emissions%20reduction%20achievable>.

Irish data on outward tourism - Household Travel Survey 2023  
<https://www.cso.ie/en/releasesandpublications/ep/p-hts/householdtravelsurveyquarter4andyear2023/>  
Irish data on inward tourism  
<https://www.cso.ie/en/releasesandpublications/ep/p-ibta/inboundtourismannual2023/>