

Submission by Children's Right Over Flights Campaign to Public Consultation on “Review of the EU ETS for maritime, aviation and stationary installations”

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14549-EU-emissions-trading-system-for-maritime-aviation-and-stationary-installations-and-market-stability-reserve-review_en

Feedback period - 14 April 2025 - 08 July 2025 (midnight Brussels time)



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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.

ETS review

We call on the ETS review to recommend the following:

- **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.¹
- **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. We note that the consultation states *“While in principle the ETS covers emissions from all flights landing in and departing from the European Economic Area (EEA), the EU has temporarily limited the scope to intra-EEA flights. This is to encourage the development of an effective global carbon pricing scheme by the International Civil Aviation Organization (ICAO).”* The EU should not wait for international efforts, which are not moving with the needed speed and effectiveness. Rather the EU must lead by example to avert the climate crisis by putting in place effective measures now, while also encouraging ICAO to also do so.

¹<https://carbonmarketwatch.org/2024/03/27/corsia-hot-air-carbon-credits-cannot-offset-polluting-planes/>

- **Include all climate-related emissions:** ETS should include the substantial non-CO2 climate effects of aviation as well as CO2 emissions.
- **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.
- **Ban advertising of aviation, flight-based holiday packages, and products transported by air freight, throughout the EU.** Advertising promotes and normalises patterns of consumption that are destructive to the climate, including frequent flying and air-freight-transported consumer products.²

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.³ 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”.⁴ 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.⁵ The world needs to reduce aviation, not expand it, to protect ourselves and our children from worsening climate breakdown.⁶

² <https://stay-grounded.org/tackling-aviation-advertising-an-end-to-normalising-climate-destruction/>

³ <https://www.theguardian.com/environment/2024/feb/09/biggest-fossil-fuel-emissions-shipping-plane-manufacturing>

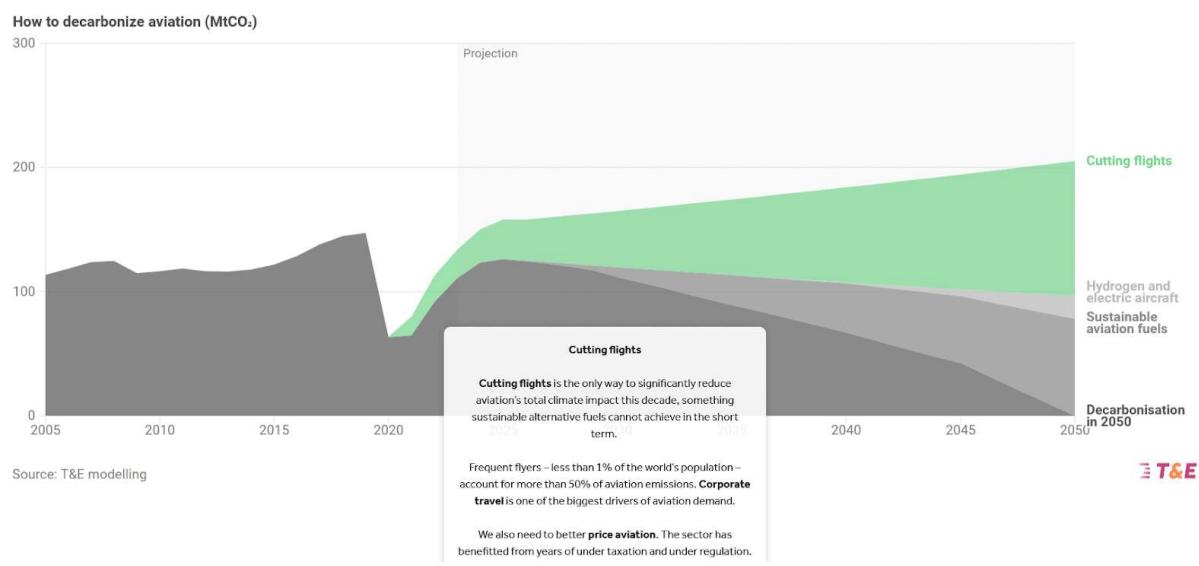
⁴ <https://www.transportenvironment.org/articles/aviation-industry-plans-for-growth-irreconcilable-with-europes-climate-goals>.

⁵ <https://www.opportunitygreen.org/publication-controlling-contrails-lowering-climate-impact-of-aviation>

⁶ <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 Irish Climate Change Advisory Council highlighted within its ‘Annual Review 2024 - Transport’ that - “Growth in the demand for aviation has outstripped energy efficiency improvements”.⁷

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



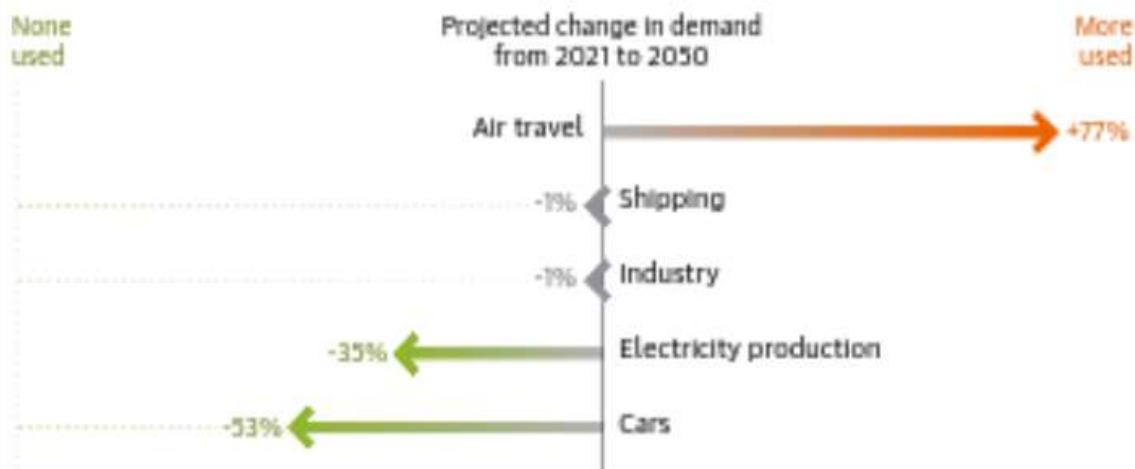
Source:⁸

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.

⁷ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/AR2024-Transport-final.pdf>

⁸ <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: ⁹

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 year¹⁰. 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 year¹¹. 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.

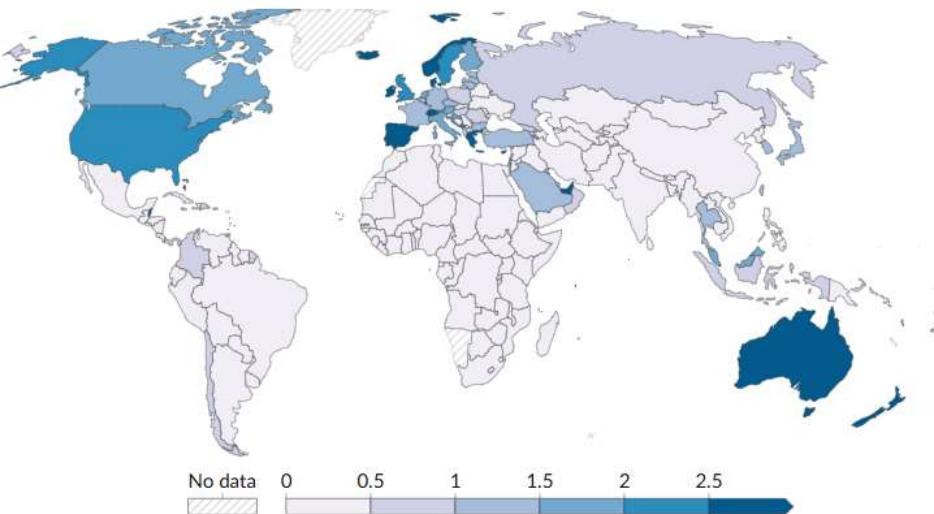
⁹<https://www.theguardian.com/environment/2024/feb/09/biggest-fossil-fuel-emissions-shipping-plane-manufacturing>

¹⁰<https://www.smithsonianmag.com/air-space-magazine/how-much-worlds-population-has-flown-airplane-180957719/>

¹¹ 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: ¹²

While fossil fuel used by household and domestic transport is taxed, jet fuel is exempt from tax.¹³

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^{14 15}

¹² <https://ourworldindata.org/grapher/air-trips-per-capita?time=2019>

¹³ <https://m.independent.ie/irish-news/unfair-jet-fuel-is-exempt-from-carbon-tax-while-households-suffer-says-expert/a1559163211.html>

¹⁴ "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/>

¹⁵ <https://theconversation.com/many-cities-are-banning-ads-for-airlines-suvs-and-fossil-fuels-and-yours-could-be-next-251322>

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 discussion of continued aviation growth. 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, we would also reinforce the importance that the climate action 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 review of the ETS recommend strong measures which will result in a substantial decrease in aviation, which is the only way of addressing the climate crisis in an equitable way.