



Children's Rights Over Flights

Submission on EU Strategy on international fairness

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14768-Strategy-on-intergenerational-fairness_en

11 November 2025

There is a need for a science-based strategy, with children's rights centred in its development, and due weight given to the imperative of urgent climate action from all sectors to protect children and future generations from climate harm.

Children's Rights Over Flights is a volunteer grassroots campaign by parents, grandparents, and other concerned people, calling for children's rights in the context of climate change to be prioritised over climate-harming aviation growth. Transport is identified as a relevant topic in the initiative information, and we wish to highlight the imperative of EU action in this regard, to ensure a fair contribution to climate action from the aviation sector to ensure "today's decisions do not harm future generations". We have been dismayed that the imperative of urgent climate action from all sectors, to protect children from climate harm, does not appear to have been given due weight or consideration in relation to EU aviation policy. We have worked as a group on this submission, carefully researched and referenced our statements with reputable sources, and base our arguments on well-founded climate science.

Given frequent campaigning and lobbying by sectoral business interests in support of aviation expansion, we would reinforce that this strategy must make clear that climate action as it relates to intergenerational fairness and the obligations of all sectors, 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”. (UN Committee on the Rights of the Child General Comment no. 2026, 2023, para 71) The 2025 International Court of Justice (ICJ) advisory opinion on the obligations of states in respect of climate change must also be a fundamental basis for this EU strategy on intergenerational fairness, given its unequivocal finding that governments must do more to address the climate crisis under human rights law, that States must regulate businesses in this regard, and that emphasized the rights of children and future generations. (ICJ Advisory Opinion, 23 July 2025)

If the Strategy on intergenerational fairness is to be science-based and truly committed to ensuring today's decisions do not harm future generations then the EU must lead by example by putting in place effective measures now to urgently cut greenhouse gas emissions from aviation - as with all other sectors. We call for the following EU level commitments and actions with respect to aviation in the context of this Strategy on intergenerational fairness:

- **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, steep reductions in permits in line with essential climate targets, inclusion of cargo/freight, inclusion of flights travelling outside the EEA, Inclusion of all climate-related emissions.
- **Remove jet kerosene tax exemption in the EU.**
- **Ban advertising of aviation, flight-based holiday packages, and products transported by air freight, throughout the EU.**

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

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.² A 2024 report by *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".³ 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.⁴ The world needs to reduce aviation, not expand it, to protect today's children and future generations from the harm of worsening climate breakdown.⁵ This should be acknowledged and committed to, within Strategy objectives on intergenerational fairness as they relate to transport.

We call on the EU strategy on intergenerational fairness to include a statement on the imperative of significantly and urgently reducing aviation emissions - as per the obligations of all parts of the transport sector, to ensure the EU and the aviation sectors decisions "do not harm future generations and to promote stronger solidarity and engagement between people of all ages".

²<https://www.theguardian.com/environment/2024/feb/09/biggest-fossil-fuel-emissions-shipping-plane-manufacturing>

³<https://www.transportenvironment.org/articles/aviation-industry-plans-for-growth-irreconcilable-with-europes-climate-goals>.

⁴<https://www.opportunitygreen.org/publication-controlling-contrails-lowering-climate-impact-of-aviation>

⁵ <https://www.unicef.org/reports/threat-to-progress>