

Submission by Children's Rights Over Flights to the consultation on updating the Clean Air Strategy.

The below strategy is submitted on behalf of the grassroots all-volunteer group Children's Rights Over Flights, and is primarily focussed on air pollution and air quality matters in relation to aviation air pollution and the Clean Air Strategy.

Is it doing what it should?

The Clean Air Strategy must be responsive to emerging research and health risks, and all sources of air pollution if it is to be fully fit-for-purpose. Within the Clean Air Strategy, there does not appear to be a substantive focus on addressing air quality and related health impacts associated with aviation pollution. Aviation pollution has serious consequences for [air quality and related health implications](#). (1) Air traffic and jet kerosene use has reached [unprecedented levels in Ireland](#), with international aviation accounting for [an estimated 10% of the national energy-related emissions](#) according to the SEAI.(2,3) At the same time, concerning research is emerging about the serious health implications of airport / aviation pollution, in particular in relation to 'ultrafine particles' (UFP) both [within and outside airplanes](#), and for [communities living close to airports](#). (4,5) [Ultrafine particles have serious mental and physical health implications across the lifespan](#), with harms possible from exposure at the earliest stages of human development in the womb.(6) [One study published in February 2026](#) found effects of a medium-large international airport (Helsinki-Vantaa, Finland) on particle number concentration (PNC) were observable even 15 kilometres away.(7) Given [Helsinki-Vantaa has less than half the annual flight passenger traffic of Dublin Airport as of 2025](#), it is vital that urgent independent research is carried out to determine air quality and related health impacts of existing unprecedented levels of Dublin Airport air traffic, so that both the 'Clean Air Strategy' and related Government policy around aviation aligns with protection of public health and best available science.(8) Most concerningly, current Government intervention to increase polluting flight traffic in Ireland from Dublin Airport via a lifting of the 'passenger cap', and via re-introduction of internal flights to Derry Airport, is fundamentally at odds with both the expressed purpose of the Clean Air Strategy "to

ensure continued reductions in air pollution emissions” and with the increasing public health implications of research.

The [WHO 2021 Air Quality Guidelines](#) (AQG), with which the Strategy is rightly aligned, lists aviation as a key source of ultra-fine particles (UFP), a particularly harmful form of pollutant. While it is noted there is insufficient data at present to set guideline levels for UFP, ‘good practice statements’ are set out, including integrating UFP monitoring into existing air quality monitoring systems. The WHO AQG also identify a future research priority as studying “the toxicity of different sources of air pollution - (e.g. tailpipe and non-tailpipe emissions, aviation and shipping emissions)” (2021, p.196).(9)

· **What’s working well?**

Positive impacts and progress of the Strategy must be acknowledged. Monitoring and periodic reporting of air quality and some efforts to improve public awareness of air pollution and its harms are positive and to be welcomed, but must be expanded upon and incorporate all sources of air pollution and ‘hotspots’, including increased attention to airports.

· **What’s not working well?**

Inadequate attention to increasing air pollution from aviation, inadequate air pollution monitoring including of airport pollution, and inadequate research and monitoring on health impacts of increasing and record-levels of aviation pollution within Ireland. A 2025 briefing by the European Environment Agency - [Air quality around ports and airports](#), included data from Dublin Airport and noted airports could be considered ‘air quality hotspots’, with elevated NO₂ and PM_{2.5} levels. This report highlighted inconsistent air quality monitoring, noting “the current location and overall number of SPOs remain insufficient for many ports and airports.”(10) A case in point - [an air quality monitor for Dublin Airport was defunct for several months in 2024](#).

· How could it work better?

A [Transport & Environment briefing](#) based on the 2024 study by CE Delft on [‘aviation’s health effects on populations living near airports’](#) recommended a range of measures to improve air quality and mitigate adverse health outcomes including: “Address exponential increase in air traffic and air pollution by banning further expansion of airport infrastructure, introduction of flight caps, promoting shift to rail, reducing business travel and targeted taxation of the aviation sector” (2024, p.2). (12) In this context, Government intervention to ‘lift the Dublin Airport passenger cap’ can be understood to be completely at odds with the Clean Air Strategy, given it would lead to [exponential increases in air pollution](#) and existing Strategy obligations should be prioritised.(13) A range of responsible policies to tackle aviation pollution should be urgently implemented nationally, as with other harmful forms of air pollution. These could include restrictions on private/ business jet travel, fiscal policies such as an end to jet kerosene subsidies and application of VAT and excise tax, frequent flyer levies, and banning of advertising for fossil fuel products, including flights.(14) Sustainable alternatives to air travel should be responsibly promoted and incentivised, and should be included within the Government’s ‘Your Journey Counts’ communications campaigns or an appropriate alternative, and within the ‘Smarter Travel’ mark scheme.

There should be focussed attention on air quality and public health protection in relation to all airports in the State within the Strategy. Enhanced air quality monitoring systems should be implemented and should include monitoring of UFPs, and targets for air quality across all airports should align with the WHO 2021 Air Quality Guidelines. There should be responsible and evidence-based awareness-raising communications for airport staff and communities living close to airports, regarding potential aviation pollution health impacts. Awareness-raising should especially target and highlight the significance for vulnerable groups to short- and long-term exposure to elevated levels of harmful pollutants from airports and air travel - children, people with existing chronic illness and especially respiratory conditions, pregnant women, and older adults. Independent research and public health guidance should be sought and applied to inform aviation policy in the context

of air pollution and health implications, including in relation to increasing air traffic at Dublin Airport and re-introduction of internal flights to Derry Airport.

References:

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- (3) SEAI (2025) Energy-related greenhouse gas emissions. <https://www.seai.ie/data-and-insights/seai-statistics/co2#:~:text=Transport%20is%20by%20far%20the,of%20national%20energy%2Drelated%20emissions>
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- (13) Opportunity Green (2025) Closing Ireland's Aviation Climate Gap. <https://opportunitygreen.org/aviation/reports/closing-irelands-aviation-climate-gap/>
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