# Consensus Statement on Fuelling Flight: Response to the ReFuelEU Proposal

BRUSSELS, FEBRUARY 2022

The Commission's ReFuelEU Aviation proposal marks a tremendous step forward for fuels policy and integrates many of the best practices learned from the past decade of European experience, merging ambitious targets with a focus on advanced feedstocks and fuels.

## By Provision:

### Target Levels

- We commend the Commission for proposing a binding Regulation, which will be directly applicable and thereby foster policy stability and investment certainty.
- The 2030 target levels in the proposal are technically achievable, but compliance with sustainability will need to be monitored closely to ensure the targets are fulfilled within the boundaries of sustainable availability. The same is especially true for the steep ramp-up foreseen in the period 2030-2050.
- We support the Commission's decision to include a sub-target for e-kerosene as a necessary step to ensure that this more challenging but essential fuel pathway can become viable through scaling and learning.
- ReFuelEU Aviation should be more ambitious about the scale and timing of e-kerosene deployment, including an earlier start, if sufficient green hydrogen and renewable electricity becomes available. This will contribute to certainty for investors and producers to scale-up production.

### Sustainability Criteria
- Biofuels produced from dedicated land have been shown to frequently compete with production of food or feed for livestock or carbon sequestration from reforestation. These type of fuels create risks around sustainability and negatively influence public perception. Therefore support for such fuels which compete with feed and food should be fully excluded from EU policy to promote SAF production.
- We commend the European Commission for including advanced feedstocks and fuels most likely to deliver high GHG reductions, provided strict sustainability criteria are adopted and targets remain in line with the sustainable availability of different feedstocks at EU level. Regulatory and financial support is needed to bring currently underdeveloped feedstocks to market.
- Support for new or underdeveloped feedstocks needs to be carefully considered to ensure that only feedstocks which are currently used for lower purposes, such as incineration or co-firing, can be utilized for fuel production. Those feedstocks which are currently used for a lower energy purpose are a welcome contribution to diversifying the narrow feedstock pool for SAF.

### Tankering
- We commend the Commission on proposing an anti-tankering provision. This will ensure an optimal uptake of SAF, thus maximizing ReFuelEU Aviation's climate benefits.

## Room for Improvement:

### Feedstocks & Targets
- In order to stimulate the production of SAFs other than via the HEFA pathway, financial support for technology development should prioritize the deployment of these technologies, enabling a wider range of feedstocks to be used.
- The production of Renewable Fuels of Non Biological Origin (RFNBOs) from industrial $CO_2$ sources leads to a potential risk of double-counting by crediting the $CO_2$ emission mitigation to both the producer of the $CO_2$ feedstock and the user of the fuel. EU policy should be designed to prevent such double counting.
- In the longer term, it is critical to ensure that lower TRL technologies such as DAC (Direct Air Capture) should be supported to guarantee large scale deployment of this carbon capturing technology.
- We request the Commission to provide a more thorough assessment on the effects of counting the emissions reductions achieved by the fuel volumes supplied under ReFuel Aviation under the revised RED II. More guidance on how to mitigate potential unfavourable effects on fuel market dynamics is desired.

### Complementary Policies
- Complementary policies, particularly those which reduce investor risk and bring down the costs of SAF, will support the first wave of SAF producers, investors and users.
- In the long-term, as the industry matures and costs come down from economies of scale, these complementary measures may be less necessary.

### Industrial Pillar
- An industrial pillar must complement the establishment of a SAF mandate to ensure that SAFs will actually be available on time, at sufficient volume and at a reasonable price.
- Such a European SAF Industrial Alliance would: Coordinate all the stakeholders along the entire value chain in compliance with antitrust rules; Put the adoption of the necessary regulatory framework and incentives at the top of the political agenda; Identify the R&D activities still needed to mature the already-certified pathways and new ones.

### Book & Claim
- We acknowledge ReFuel's vision of supplying SAF to all union airports. We recognize that physically supplying SAF to all Union airports could prove challenging at certain airports and we call on the Commission to explore flexibilities for their SAF supply.
- From the start, an obligatory public system of SAF registration, allocation, accounting and reporting (SAF registry) applying to fuel suppliers would account for SAF volumes supplied to the EU market and help stimulate further SAF demand while avoiding double counting. More formalized documentation and tracking methods will create transparency and ensure trust in the process.
- Next to monitoring the obliged volumes of the SAF mandate, the establishment of such a SAF registry will permit a book & claim system to be established which will incentivize financial contributions from airlines and others, such as customers, to use additional SAF beyond the level of the mandate. Such a system must not enable any change to the scope or cost base of the proposed mandate and is a distinct policy decision independent of the establishment of the registry, nor change the roles and responsibilities which ensure that only eligible SAF enter the European market. The Commission proposal should be amended to include such a provision to establish such a SAF registry.

**Each of the organisations listed below supports this statement:**


aireg — Aviation Initiative for Renewable Energy in Germany e.V.


AIRFRANCE


Bauhaus Luftfahrt — Neue Wege.


Deutsche Post DHL Group


easyJet


ECA — Piloting Safety — European Cockpit Association


KLM Royal Dutch Airlines


NATUUR & MILIEU


RYANAIR


SkyNRG


TRANSPORT & ENVIRONMENT