



GREENPEACE



Rt Hon Grant Shapps MP & Rt Hon Robert Courts MP
Secretary of State and Minister for Transport
Department for Transport
33 Horseferry Road
London
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10th June 2021

Dear Ministers,

Rigorous sustainability criteria and mandate scope must be set out to ensure the UK's forthcoming Sustainable Aviation Fuel Mandate avoids past mistakes: open letter

We are writing to highlight the risks and opportunities presented by a Sustainable Aviation Fuel (SAF) mandate and to request that the government define clear sustainability criteria before setting target levels. We request that proposals for the mandate – which we anticipate being published shortly – be split into a two stage consultation to allow appropriate consideration of the scope and criteria for a mandate up front.

Aviation must tackle its environmental impacts and achieve net zero emissions by 2050. Initiatives focussed on developing new technologies and fuels towards this goal, such as the Jet Zero Council, are essential. The UK is well-placed, in particular, to become a global leader in e-kerosene production. Your government's aim for 5GW of hydrogen production capacity by 2030^[1] is a solid foundation to set up the UK to become a world leader in net zero e-kerosene production.

With the right approach, this first ever UK SAF mandate should be a vital step in achieving your government's 2050 net zero ambitions, stimulating the market for critical net zero technologies such as green hydrogen and direct air capture, running on clean renewable power, to support the development of e-kerosene. It would also be a welcome sign that the government is willing to act, especially since the industry's voluntary approach has thus far failed to deliver (given the lack of progress to date on stimulating the market for SAFs, and enduring concerns over their sustainability).

If poorly designed, however, a SAF mandate risks repeating past mistakes of some road biofuels, causing more harm than good, and locking the aviation sector into a technology pathway that is fundamentally at odds with achieving net zero by 2050.

The key factors determining the success of the scheme, and the UK's continuing credibility in claiming climate leadership, are the criteria defining what constitutes a sustainable aviation fuel. These must be developed first, before moving onto any discussion of how much SAF usage – what percentage by what year – to mandate.

We propose the government adopt a two stage consultation process. Stage one would deal with what constitutes a sustainable aviation fuel and how any double counting of emissions savings would be avoided. It would also examine alternative uses for feedstock, including wastes; how production of SAF meets circular economy principles; how the waste hierarchy will be followed; and how to address limited resources, including land. Only once these complex and, in some cases contentious, issues have been resolved should a second consultation take place on the appropriate level or levels for a mandate.

Specifically we would like to see the Government:

- Exclude the use of conventional crop-based biofuels, including palm and soy products. These can have both direct and indirect negative impacts, such as land use change, deforestation, biodiversity loss and worsened food insecurity.
- Carefully consider whether there is any role for waste-based fuels in aviation, noting that these are not a net zero carbon solution, and if so how to avoid waste products that are not genuine, and ensure advanced biofuels feedstocks respect the waste hierarchy and the cascading principle.
- Specify that e-kerosene made from combining hydrogen and carbon to produce synthetic jet fuel must only use hydrogen generated from additional renewable electricity and that a significant proportion of the carbon components must be derived from direct air capture (DAC), with the aim to increase this to 100% DAC as rapidly as possible.
- Mandate all fuel suppliers, requiring them to supply an increasing minimum SAF percentage in their total overall jet fuel uplifted to planes in the UK. To be clear, this should apply to all fuel supplied, no matter who the end customer is, or what the final destination of an aircraft is: be it domestic, short-haul or long-haul flights.

The second stage consultation, while primarily concerned with appropriate mandate levels, should also consider issues such as how to define dissuasive penalties in cases where suppliers fail to achieve the required mandate levels, ensuring that the penalty level is in excess of the gap in price between fossil kerosene and the most expensive eligible SAF, to eliminate the risk that a supplier would make a calculated decision to pay the penalty, rather than comply with the rules.

Finally, we wish to emphasise that SAF is not a panacea. Burning SAF in an aircraft still results in CO₂ being added to the atmosphere. Furthermore, it also results in non-CO₂ emissions which have a substantial additional warming effect. Truly sustainable fuel for aviation would do neither of those things. We look forward to the publication of the government's net zero aviation consultation to provide the wider framework guidance: it should contain further details on what policies also need to be developed to ensure the development and commercialisation of true zero-emission aircraft and fuels.

Your government has recently proved itself to be a global leader in tackling emissions from aviation by committing to formally include emissions from international aviation and shipping (IAS) in the sixth (and presumably future) carbon budgets. The UK should ensure that 2019 was the peak year for

UK aviation emissions, and a SAF mandate with robust sustainability criteria that sets aviation onto a net zero-aligned flightpath would go a long way to achieving that ambition.

Yours sincerely,

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Mike Childs, Head of Science, Policy and Research, Friends of the Earth England, Wales and Northern Ireland

Roz Bulleid, Deputy Policy Director, Green Alliance

Doug Parr, Policy Director, Greenpeace

Matt Finch, UK Policy Manager, Transport & Environment

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf