

## ICAO State Action Plan on CO<sub>2</sub> emissions from aviation



Kingdom of Denmark

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## Common preamble

- a) The ICAO Contracting State Denmark is a member of the European Union and of the European Civil Aviation Conference (ECAC). ECAC is an intergovernmental organisation covering the widest grouping of Member States<sup>1</sup> of any European organisation dealing with civil aviation. It is currently composed of 44 Member States and was created in 1955.
- b) ECAC States share the view that the environmental impacts of the aviation sector must be mitigated, if aviation is to continue to be successful as an important facilitator of economic growth and prosperity, being an urgent need to achieve the ICAO long-term aspirational goal (LTAG) for international aviation of net-zero carbon emissions by 2050, and to strive for further emissions reductions. Together, they fully support ICAO's on-going efforts to address the full range of those impacts, including the key strategic challenge posed by climate change, for the sustainable development of international air transport.
- c) All ECAC States, in application of their commitment in the 2016 Bratislava Declaration, support CORSIA implementation and have notified ICAO of their decision to voluntarily participate in CORSIA from the start of its pilot phase and have effectively engaged in its implementation.
- d) Denmark, like all of ECAC's 44 States, is fully committed to and involved in the fight against climate change and works towards a resource-efficient, competitive and sustainable multimodal transport system.
- e) Denmark recognises the value of each State preparing and submitting to ICAO an updated State Action Plan for CO<sub>2</sub> emissions reductions as an important step towards the achievement of the global collective goals agreed since the 38th Session of the ICAO Assembly in 2013 and the monitoring of the long-term aspirational goal agreed at Assembly 41.
- f) In that context, it is the intention that all ECAC States submit to ICAO an action plan. This is the action plan of Denmark.
- g) Denmark strongly supports the ICAO basket of measures as the key means to achieve ICAO's LTAG target and shares the view of all ECAC States that a comprehensive approach to reducing aviation CO<sub>2</sub> emissions is necessary, and that this should include:
- i. emission reductions at source, including European support to CAEP work in this matter (standard setting process);
  - ii. research and development on emission reductions technologies, including public-private partnerships;
  - iii. development and deployment of sustainable aviation fuels, including research and operational initiatives undertaken jointly with stakeholders to meet the ICAO aspirational vision of reducing CO<sub>2</sub> emissions by 5% by 2030 through increased use of SAF worldwide;
  - iv. improvement and optimisation of Air Traffic Management and infrastructure use within Europe, in particular through the Single European Sky ATM Research (SESAR), and also beyond European borders through participation in international cooperation initiatives; and
  - v. Market Based Measures, which allow the sector to continue to grow in a sustainable and efficient manner, recognizing that the measures at (i) to (iv) above cannot, even

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<sup>1</sup> Albania, Armenia, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Moldova, Monaco, Montenegro, Netherlands, North Macedonia, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine, and the United Kingdom.

in aggregate, deliver in time the emissions reductions necessary to meet the ICAO long term aspirational goal of net-zero carbon emissions by 2050.

h) In Europe, many of the actions which are undertaken within the framework of this comprehensive approach are in practice taken collectively, including many led by the European Union. They are reported in Section 1 of this Action Plan, where the involvement of Denmark is described, as well as that of other stakeholders.

i) In Denmark a number of actions are undertaken at the national level, including those by stakeholders. These national actions are reported in Section 2 of this Plan.

j) In relation to European actions, it is important to note that:

- The extent of participation will vary from one State to another, reflecting the priorities and circumstances of each State (economic situation, size of its aviation market, historical and institutional context, such as EU/non-EU). The ECAC States are thus involved in different degrees and on different timelines in the delivery of these common actions. When an additional State joins a collective action, including at a later stage, this broadens the effect of the measure, thus increasing the European contribution to meeting the global goals.
- Acting together, the ECAC States have undertaken measures to reduce the region's emissions through a comprehensive approach. Some of the measures, although implemented by some, but not all of ECAC's 44 States, nonetheless yield emission reduction benefits across the whole of the region (for example research, SAF promotion or ETS).

## Introduction: Current state of aviation in Kingdom of Denmark

The Kingdom of Denmark is a sovereign state covering Denmark, Greenland, and the Faroe Islands. Greenland and the Faroe Islands has an extensive degree of self-government and have assumed legislative and administrative responsibility in several areas. While Denmark is a part of the European Union, Greenland and the Faroe Islands are not.

Denmark is part of the Nordic Region in Europe and has borders with Germany to the south, and maritime borders to Sweden in the East and Norway to the North. Denmark covers an area of 43,000 km<sup>2</sup> with 6 million inhabitants. It is the smallest but also the most densely populated country in the Nordic Region with 130 inhabitants per km<sup>2</sup>. The country consists of the Jutland peninsula and over 400 islands, of which Zealand and Funen are the largest. The capital of Denmark, Copenhagen, is situated on the east coast of Zealand.

Denmark is bound together by many roads, railways, bridges and ferry routes. Domestic flights play a minor, but important role in linking the various parts of the country together.

Greenland is situated in the Arctic between the Arctic and Atlantic oceans. Greenland shares a maritime border with Canada to the West. Greenland covers an area of 2,166,086 km<sup>2</sup> and has a population of around 56,800. The population density of Greenland is around 0.028 inhabitant per km<sup>2</sup>. Three quarters of Greenland is covered by an ice sheet, why Greenlandic cities and settlements are located along the ice-free coast. The capital and largest city of Greenland is Nuuk with almost 18.000 inhabitants. However, many inhabitants also live in coastal settlements, primarily on the west coast.

Greenland does not have road- or train connections between its cities and is therefore highly dependent on domestic aircraft and helicopter connections.

The Faroe Islands are an archipelago in the North Atlantic Ocean. The Faroe Islands consist of 18 major islands (and a total of 779 islands, islets and skerriers) and covers an area around 1,400 km<sup>2</sup>. The Faroe Islands have a population of 54,800, which entails a population density of 38.6 per km<sup>2</sup>. The capital and largest city is Tórshavn, located on the east coast of Streymoy. The Faroe Islands are rugged and rocky with a coastline consisting mostly of cliffs.

Roads are the main method of transportation on the Faroe Islands, and the main islands are connected by bridges and tunnels. There are no railways on the Faroe Islands, but there are ferry services to main town and villages, as well as to Iceland and Denmark. Some islands have regular helicopter connections with the main towns.

### **Domestic Aviation in the Kingdom of Denmark**

Denmark has 9 public airports with more than 10,000 passengers per year. Copenhagen Airport has the largest number of passengers, while Billund is the largest provincial airport.

The provincial airports in Denmark are placed with a short travel time to Copenhagen Airport. Currently, there are domestic routes between Copenhagen and respectively Aalborg, Aarhus, Midtjylland, Billund, Bornholm, and Sønderborg, and also between Bornholm and respectively Billund, Aalborg and Sønderborg.

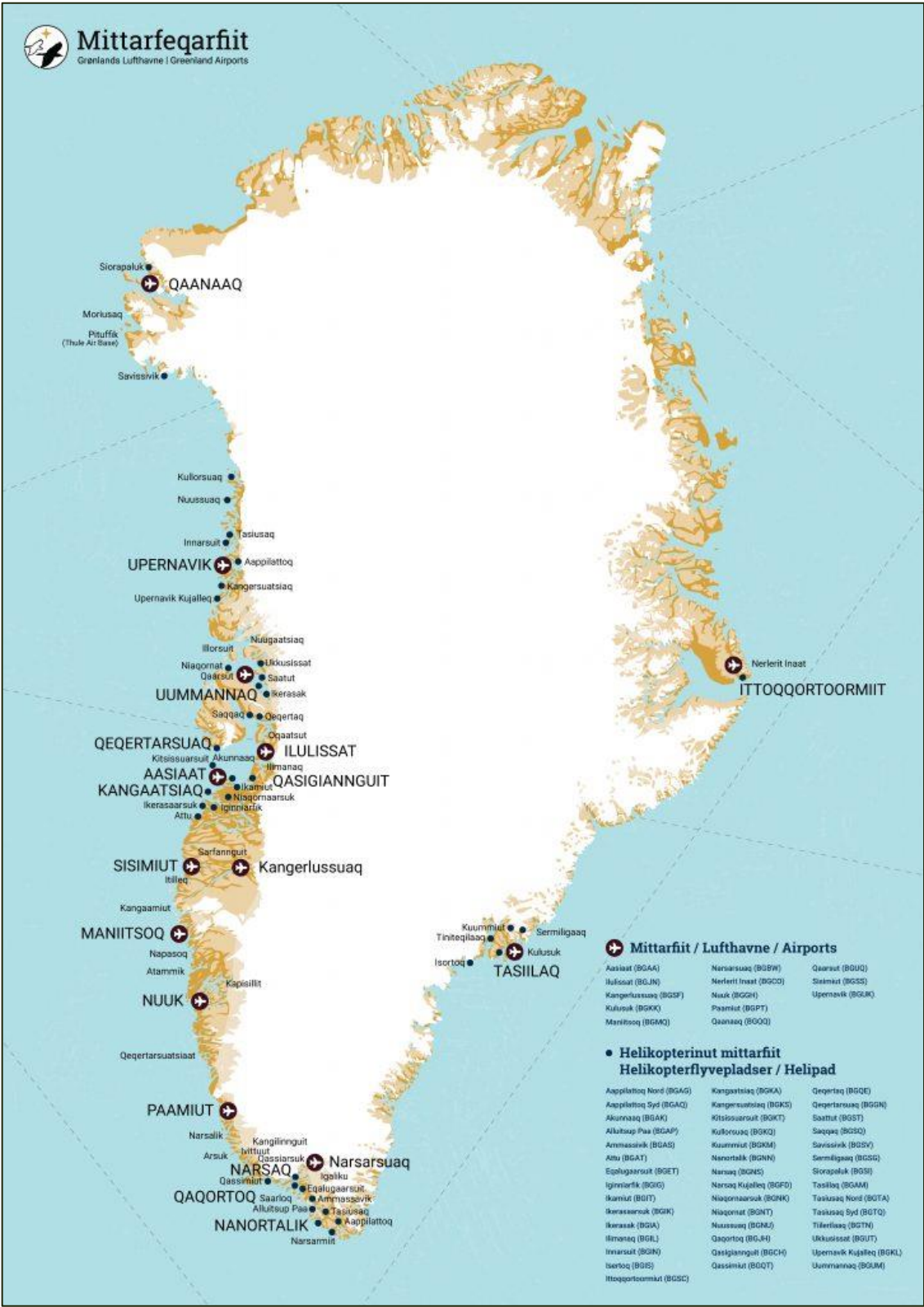
In addition, there are flights between Copenhagen and Nuuk in Greenland, and between Billund and Nuuk in the summer season. There are flights between Danish airports and Vagar Airport on the Faroe Islands, which in Denmark are also considered as domestic routes.

Copenhagen Airport A/S is a shareholder company. A political majority in the national parliament has decided to buy a majority stake in Copenhagen Airport A/S and the airport is expected to come under majority ownership of the Danish State in 2025. The other larger provincial airports are owned by the municipalities, except Roskilde Airport, which is owned by Copenhagen Airport A/S, and Bornholms (Rønne) Airport which is owned by the Danish state.

Greenland has 13 airports for fixed-wing aircrafts and 46 heliports/helistops. Most are located on the western coast of Greenland. Greenlands Airports is the national airport operator of airports in Greenland and is owned by the Government of Greenland. Greenland Airports are building three new airports in Nuuk, Ilulissat and Qaqortoq. The new, extended Nuuk Airport was officially opened on 28 November 2024, and it is now possible to fly directly from Europe and North America to Nuuk.

The Faroe Island has one airport, Vagar Airport, located on the island Vagar, and 8 heliports throughout the Faroe Islands.







## **Danish international aviation**

Danish international aviation is dominated by two key players: SAS and Copenhagen Airport. However, the Norway-based airline, Norwegian, also holds a considerable market share.

The SAS Group has, as a Scandinavian-based airline, many routes in both Europe and overseas. SAS Group is part of the SkyTeam Alliance and has in recent years felt the increasing competition from low fare airlines. The key hub for the SAS Group is Copenhagen Airport.

Copenhagen Airport is by far the largest airport in Denmark with around 26,5 million passengers in 2023. In 2019 Copenhagen Airport A/S presented an updated master plan for the future, which prepares the airport for the continuous development to meet future needs. In 2023 a new law specifying the framework for land use at Copenhagen Airport was passed. The law entails more flexibility for land use giving extended possibilities to adapt to the expected growth of the airport.

There are four airports with international departures in Jutland: Billund, Aalborg, Esbjerg and Aarhus.

## **Air operators in the Kingdom of Denmark**

There are around 15 aviation operators with an EU license to operate aircrafts with an approved starting volume larger than 10 tons, more than 20 seats or an annual turnover that exceeds 3 million euros. Moreover, there are two North Atlantic aviation companies, Air Greenland and Atlantic Airways, who have Danish concessions to fly passengers, cargo, mail etc. The two largest companies measured by turnover the last few years are SAS Group and Sunclass Airlines.

SAS Group operates as a Scandinavian airline with one AOC and consists of the companies SAS Danmark A/S, SAS Norge ASA and SAS Sverige AB, which respectively have Danish, Norwegian, and Swedish EU license. From august 2024 SAS Group is owned by Castlake, Danish Ministry of Finance, Air France-KLM and Lind invest (respectively owning 32 %, 25,8 %, 19,9 % and 8,6 %). Regarding EU ETS, UK ETS, CH ETS, and CORSIA covered emissions, SAS' operations are reported as a whole to the Swedish competent authority, as SAS' headquarters lies in Stockholm, Sweden.

Air Greenland is a Greenlandic airline, owned by the Government of Greenland. The airline's route network consists of 70 different connections between airports, heliports, and helistops. Air Greenland operates fixed-winged aircrafts between larger and smaller airports in Greenland, and to Denmark and Iceland. The airline's helicopter network operates between airports and smaller settlements throughout Greenland.

Atlantic Airways is the airline of the Faroe Islands. Atlantic is operating both domestic helicopter services and international routes from Vagar Airport. International routes include both year-around and seasonal destinations.



## Air Traffic Services

The Danish Civil Aviation Agency has designated Naviair as the Air Traffic Service provider in Denmark. Naviair is a state-owned infrastructure company with status as an independent public entity.

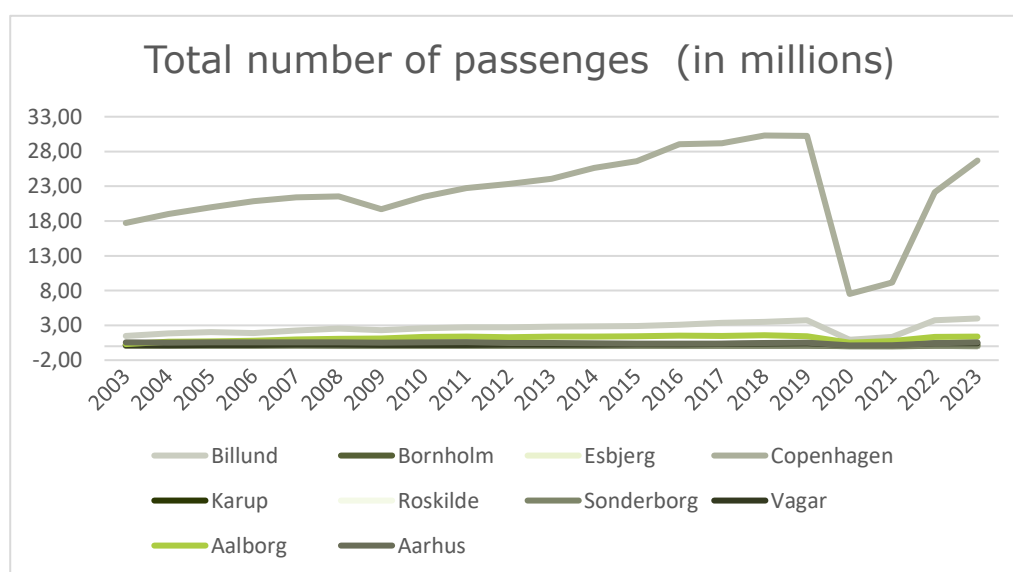
Naviairs mission is to facilitate availability and mobility in airspace to support growth and safety in Denmark.

Naviair has activities both in Danish airspace and North Atlantic airspace. The activities cover ATM en route in Denmark, system support en route in Greenland, AFIS in Vagar, Local Air Traffic Services, and other areas of activity. Expressed in terms of revenue, en route – Denmark is the biggest area of activity.

The Kingdom of Denmark has agreements with Canada and Iceland regarding the provision of air traffic services within parts of Greenlandic airspace over FL195. However, the Kingdom of Denmark is in dialogue with the countries concerning the possibility of returning the management of air traffic services in Greenland to Denmark.

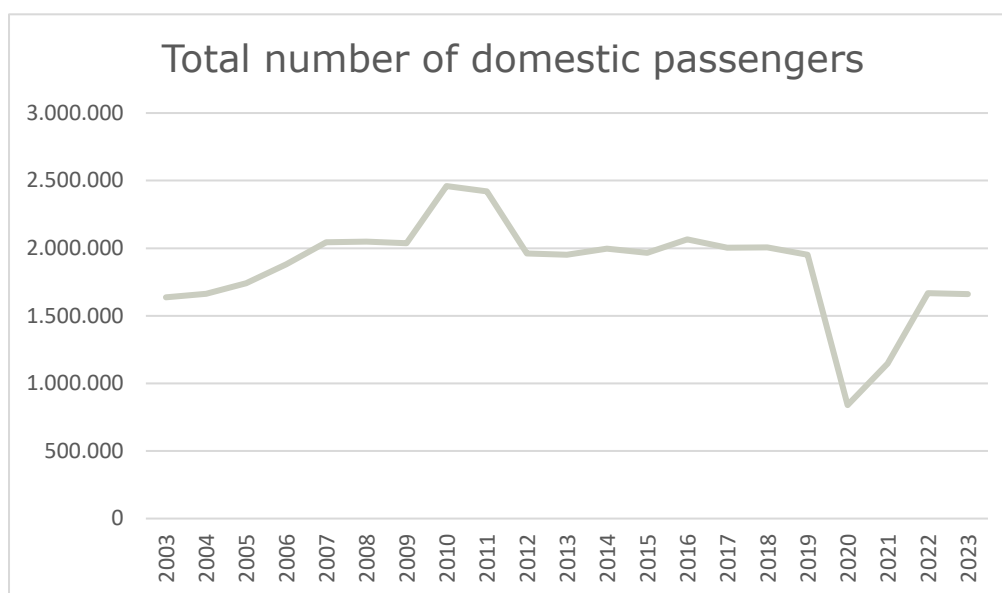
## Danish aviation in numbers

The total number of passengers in the larger Danish airports has been increasing over the past years from around 20,8 million passengers in 2003 to 33,5 million in 2023. Of the total passenger number, Copenhagen Airport is accounting for more than 80%.



*Total number of passengers in Danish Airports*

The total number of domestic passengers in Denmark has varied throughout the last 20 years, with the highest number in 2009-2011. Following a drastic fall the beginning of 2020 due to the COVID-19 pandemic, the number of domestic passengers has slowly risen. In 2023, the total number of domestic passengers amounted to around 1,6 million.



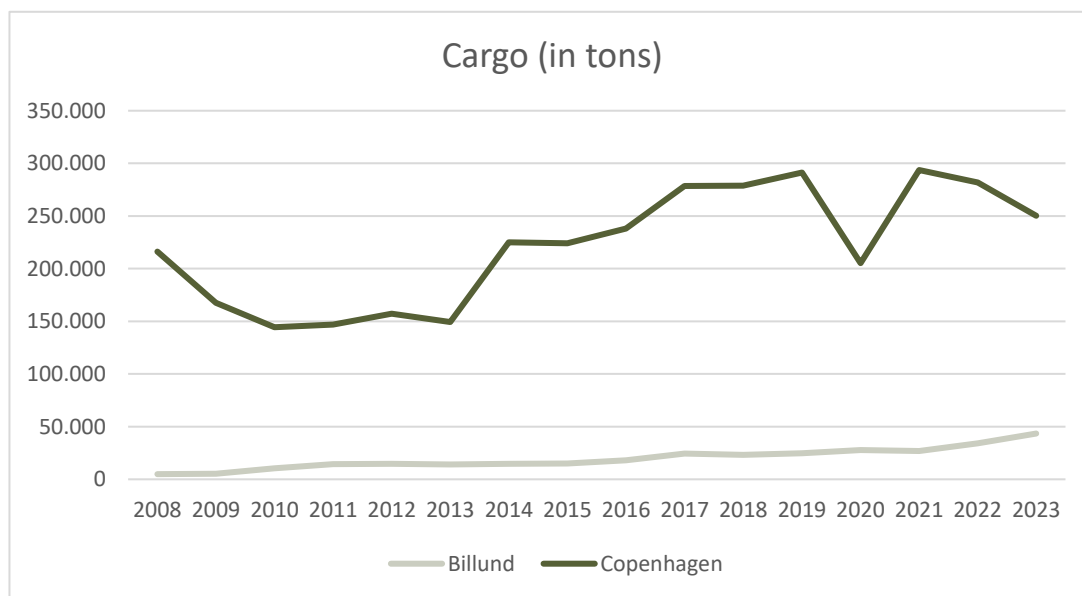
*Development in domestic passengers since 2003*

The table below shows the total number of passengers in the 9 public airports in Denmark and Vagar Airport in 2023 (data for Greenland is not available). Moreover, the table also shows the airports total number of domestic passengers, as well as their percentage of the total number of passengers divided into domestic and international passengers.

*Table 1*

Airports	Total number of passengers	Total domestic	% domestic	% international
<b>Copenhagen</b>	26.697.123	1.629.597	6,1	93,9
<b>Billund</b>	3.995.820	96.094	2,4	97,6
<b>Aalborg</b>	1.410.575	808.603	57,3	42,7
<b>Aarhus</b>	543.819	135.289	24,9	75,1
<b>Midtjylland</b>	13.038	11.473	88	22
<b>Bornholm</b>	202.575	196.848	97,2	2,8
<b>Esbjerg</b>	96.819	40.149	41,5	58,5
<b>Sønderborg</b>	49.357	47.213	95,7	4,3
<b>Roskilde</b>	24.152	13.716	56,8	43,2
<b>Vagar</b>	431.229	340.301	78,9	21,1

The total quantity of cargo transported by airplane in the years 2008-2023 has varied but amounted to around 292.000 tons in 2023. Only the two largest airports, Copenhagen Airport and Billund Airport, handle a significant amount of air cargo. Copenhagen Airport accounts for around 80% of cargo in Danish airports. The figure below shows the development in air cargo in the two airports.



*Development in cargo (in tons) in the Copenhagen Airport and Billund Airport*

**EUROPEAN STATES' ACTION PLANS**

**ECAC/EU COMMON SECTION**

**5<sup>th</sup> Edition – 30 October 2024**

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## Section 1: ECAC/EU common section for European State Action Plans

Please note that Denmark is not necessarily participating actively in all the following activities, but we are contributing to them through the financing of EU programs, membership of Eurocontrol and general political support. Some of the Danish involvement is described in section 2 of this action plan.

### **Executive Summary**

The European Section of this action plan, which is common to all European State Action Plans, presents a summary of the actions taken collectively in the 44 States of the European Civil Aviation Conference (ECAC) to reduce CO<sub>2</sub> emissions from the aviation system.

Aviation is a fundamental sector of the European economy, and a very important means of connectivity, business development and leisure for European citizens and visitors. For over a century, Europe has led the development of new technologies, and innovations to better meet society's needs and concerns, including addressing the sectorial emissions affecting the climate.

Since 2019, the COVID-19 pandemic has generated a world-wide human tragedy, a global economic crisis and an unprecedented disruption of air traffic, significantly changing European aviation's growth and patterns and heavily impacting the aviation industry. The European air transport recovery can nevertheless be an opportunity to accelerate its contribution to the achievement of the global climate ambitions.

In 2023, the number of flights in Europe reached 92% of the 2019 (pre-COVID) levels, owing to the continuous recovery since the outbreak and the strengthening volumes during summer. Ukraine's airspace has remained closed since February 2022, with neighbouring airspace absorbing more traffic (and diverted flights overloading the busy South-East axis). The start of the conflict in the Middle East (October 2023) has affected various flows that were unable to overfly the zone. Geopolitical crises have also had an impact on flows in the South Caucasus, especially overflights. At the moment of drafting this plan, the level of uncertainty of how these crises will impact international air traffic in the long-term is still high, so the assessments made might be revised in the next update, as more accurate data of such impacts are expected to be available. EUROCONTROL is publishing regular comprehensive assessments of the latest traffic situation in Europe, and such best-available data have been used for the preparation of the European common section of this action plan.

The common section includes an updated description and assessment of the collective European efforts taken to mitigate the climate impacts of aviation, as well as the description of future measures driving to additional CO<sub>2</sub> savings.

### *Aircraft related technology*

European members have worked together to best support the progress in the ICAO Committee on Aviation Environmental Protection (CAEP). This contribution of resources, analytical capability and leadership has undoubtedly facilitated leaps in global certification standards that have helped drive the markets demand for technology improvements. Europe is now fully committed to the implementation of the 2016 ICAO CO<sub>2</sub> standard for newly built aircraft and on the need to review it on a regular basis in light of developments in aeroplane fuel efficiency.

Environmental improvements across the ECAC States are knowledge-led and at the forefront

of this is the Clean Sky EU Joint Technology Initiative (JTI) that aims to develop and mature breakthrough “clean technologies”. The second joint undertaking (Clean Sky 2 – 2014-2024) had the objective to reduce aircraft emissions and noise by 20 to 30% with respect to the latest technologies entering into service in 2014. The European Partnership for Clean Aviation (EPCA) will follow in the footsteps of Clean Sky2.

This activity recognises and exploits the interaction between environmental, social and competitiveness aspects with sustainable economic growth. Funding and its motivation are critical to research and the public private partnership model of the EU Research and Innovation programme underpins much that will contribute to this and future CO<sub>2</sub> action plans across the ECAC region.

The main efforts under Clean Sky 2 include demonstrating technologies: for both large and regional passenger aircraft, improved performance and versatility of new rotorcraft concepts, innovative airframe structures and materials, radical engine architectures, systems and controls, and consideration of how we manage aircraft at the end of their useful life. This represents a rich stream of ideas and concepts that, with continued support, will mature and contribute to achieving the goals on limiting global climate change.

#### *Sustainable Aviation Fuels (SAF)*

ECAC States are embracing the introduction of SAF in line with the 2050 ICAO Vision and are taking collective actions to address the many current barriers for SAF widespread availability or use in European airports. It has been proven fit for purpose and the distribution system has demonstrated its capacity to handle SAF. At European Union level, the ReFuelEU Aviation Regulation, which applies since 1 January 2024 will boost the supply and demand for SAF in the EU, while maintaining a level playing field in the air transport market. ReFuelEU Aviation aims to put air transport on the trajectory of the EU’s climate targets for 2030 and 2050, as SAF are one of the key short- and medium-term tools for decarbonising aviation.

The common European section of this action plan also provides an overview of the current sustainability and life cycle emissions requirements applicable to SAF in the European Union’s States as well as estimates of life cycle values for several technological pathways and feedstock. Collective work has also been developed through EASA on addressing barriers of SAF penetration into the market. The European Research and Innovation programme is also giving impulse to innovative technologies to overcome such barriers as it is highlighted by the number of recent European research projects put in place and planned to start in the short-term.

#### *Improved Air Traffic Management*

The Single European Sky (SES) policy of the European Union is designed to overhaul Air Traffic Management (ATM) across Europe. This initiative is geared towards digitizing services, enhancing capacity, cutting ATM costs, and boosting safety, alongside reducing the environmental impact by 9.3% by 2040. The SES framework includes multiple elements, such as the development and implementation of cutting-edge technical and operational ATM solutions.

The SESAR programme, divided into three phases—SESAR 1 (2008-2016), SESAR 2020 (starting in 2016), and the ongoing SESAR 3 (2021-2031)—is central to advancing these solutions. By the end of the SESAR 3 Wave 2, the solutions developed and validated are expected to yield fuel savings per flight within the ECAC area between 3.6% (180.9 kg, at V3 maturity level only) to 4.6% (227.8 kg, with full and partial V3 maturity benefits considered), translating directly into comparable CO<sub>2</sub> reductions.



### *Market Based Measures (MBM)*

Recognising the need for a global, market-based measure for aviation emissions (to incentivize and reward good investment and operational choices), ECAC Member States have been strong supporters of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). Pursuant to their 2016 Bratislava Declaration, ECAC member States have voluntarily participated in the scheme since its pilot phase in 2021 and have encouraged other States to follow suit.

To implement CORSIA while preserving the environmental integrity of EU law, the EU ETS Directive was amended in 2023. It extended the restriction of the EU ETS geographical scope to flights between States of the European Economic Area (EEA)<sup>2</sup> and departing flights to the United Kingdom and Switzerland until the end of 2026. EEA States apply the EU Emissions Trading System (EU ETS), while both Switzerland and the United Kingdom implement their own emissions trading systems.

Overall, 500 aircraft operators are regulated under these cap-and-trade market-based measures aimed at limiting CO<sub>2</sub> emissions. In the period 2013 to 2020, the EU ETS has saved an estimated 200 million tonnes of intra-European aviation CO<sub>2</sub> emissions.

### *ECAC Scenarios for Traffic and CO<sub>2</sub> Emissions*

Despite the current extraordinary global decay on passengers' traffic due to the COVID-19 pandemic, hitting the European economy, tourism and the sector itself, aviation is expected to continue to grow in the long-term, develop and diversify in many ways across the ECAC States. Air cargo traffic has not been impacted as the rest of the traffic and thus, whilst the focus of available data relates to passenger traffic, similar pre-COVID forecasted outcomes might be anticipated for cargo traffic both as belly hold freight or in dedicated freighters. Analysis by EUROCONTROL and EASA have identified the most likely scenario of influences on future traffic and modelled these assumptions out to future years. Based on this traffic forecast, fuel consumption and CO<sub>2</sub> emissions of aviation have been estimated for both a theoretical baseline scenario (without any mitigation action) and a scenario with implemented mitigation measures that are presented in this action plan.

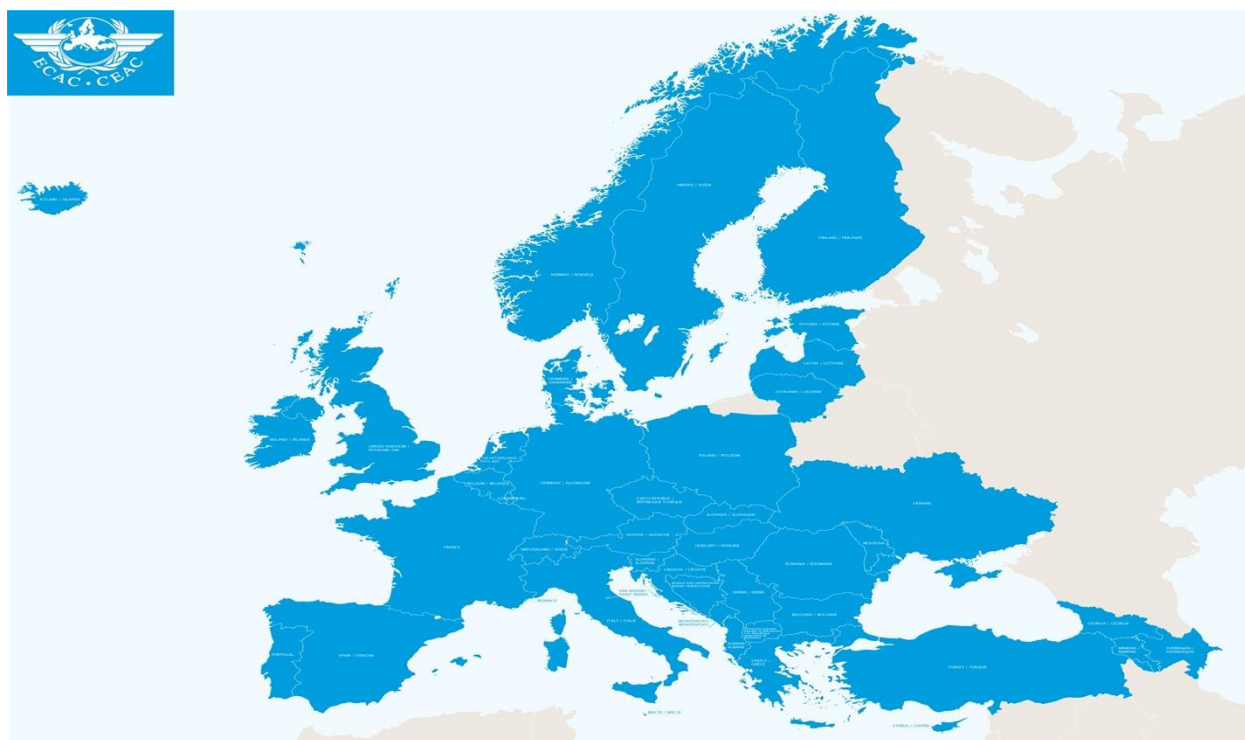
Under the baseline assumptions of traffic growth and fleet rollover with 2023 technology, CO<sub>2</sub> emissions would significantly grow in the long-term for flights departing ECAC airports without mitigation measures. Modelling the impact of improved aircraft technology for the scenario with implemented measures indicates an overall 21% reduction of fuel consumption and CO<sub>2</sub> emissions in 2050 compared to the baseline. Whilst the data to model the benefits of ATM improvements may be less robust, they are nevertheless valuable contributions to reduce emissions further. Overall CO<sub>2</sub> emissions, including the effects of new aircraft types and ATM-related measures, are projected to improve to lead to a 29% reduction in 2050 compared to the baseline.

The potential of market-based measures and their effects have been simulated in detail in the common section of this action plan (Chapter 4), but they will help reach the goal of carbon-neutral growth. As further developments in policy and technology are made, further analysis will improve the modelling of future emissions.

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<sup>2</sup> Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

## **A. ECAC BASELINE SCENARIO AND ESTIMATED BENEFITS OF IMPLEMENTED MEASURES**



## 1. ECAC Baseline Scenario

The baseline scenario is intended to serve as a reference scenario for CO<sub>2</sub> emissions of European aviation in the absence of any of the mitigation actions described later in this document. The following sets of data (2010, 2019, 2023) and forecasts (for 2030, 2040 and 2050) were provided by EUROCONTROL for this purpose:

- European air traffic (includes all commercial and international flights departing from ECAC airports, in number of flights, revenue passenger kilometres (RPK) and revenue tonne-kilometres (RTK));
- its associated aggregated fuel consumption; and
- its associated CO<sub>2</sub> emissions.

The sets of forecasts correspond to projected traffic volumes in a 'Base' scenario, corresponding to the most-likely scenario, while corresponding fuel consumption and CO<sub>2</sub> emissions assume the technology level of the year 2023 (i.e. without considering reductions of emissions by further aircraft related technology improvements, improved ATM and operations, sustainable aviation fuels or market-based measures).

### Traffic Scenario 'Base'

As in all forecasts produced by EUROCONTROL, various scenarios are built with a specific storyline and a mix of characteristics. The aim is to improve the understanding of factors that will influence future traffic growth and the risks that lie ahead. The latest EUROCONTROL Aviation Long-Term Outlook to 2050<sup>3</sup> has been published in 2024 and inspects traffic development in terms of Instrument Flight Rule (IFR) movements to 2050.

In the latter, the scenario called 'Base' is constructed as the 'most likely' scenario for traffic, most closely following the current trends. It considers a moderate economic growth with regulation reflecting environmental, social and economic concerns to address aviation sustainability. This scenario follows both the current trends, and what are seen as the most likely trends into the future.

Amongst the models applied by EUROCONTROL for the forecast the passenger traffic sub-model is the most developed and is structured around five main groups of factors that are taken into account:

- **Global economy** factors represent the key economic developments driving the demand for air transport.
- Factors characterizing the **passengers** and their travel preferences change patterns in travel demand and travel destinations.
- **Price of tickets** set by the airlines to cover their operating costs influences passengers' travel decisions and their choice of transport.
- More hub-and-spoke or point-to-point **networks** may alter the number of connections and flights needed to travel from origin to destination.
- **Market structure** considers a detailed analysis of the fleet forecast and innovative projects, hence the future size of aircraft used to satisfy the passenger demand (modelled via

<sup>3</sup> EUROCONTROL Long-Term Aviation Outlook to 2050, EUROCONTROL, December 2024. (link to the report <https://www.eurocontrol.int/publication/eurocontrol-forecast-2024-2050>)

the Aircraft Assignment Tool).

**Table 1** below presents a summary of the social, economic and air traffic related characteristics of three different scenarios developed by EUROCONTROL. The year 2023 served as the baseline year of the 30-year forecast results<sup>4</sup> (published in 2024 by EUROCONTROL). Historical data for the year 2010 and 2019 are also shown later for reference.

**Table 1.** Summary characteristics of EUROCONTROL scenarios

	<i>High</i>	<i>Base</i>	<i>Low</i>
7-year flight forecast 2024-2030	High ↗	Base →	Low ↘
<b>Passenger</b>			
Demographics (Population)	Aging UN Medium-fertility variant	Aging UN Medium-fertility variant	Aging UN Zero-migration variant
Routes and Destinations	Long-haul ↗	No Change →	Long-haul ↘
High-Speed&Night trains (new & improved connections)	32 HST/29 NT city-pairs faster implementation	31 HST/29 NT city-pairs	26 HST city-pairs later implementation.
<b>Economic conditions</b>			
GDP growth	Stronger ↗	Moderate →	Weaker ↘↘
EU Enlargement	+7 States, Later	+7 States, Earliest	+7 States, Latest
Free Trade	Global, faster	Limited, later	None
<b>Price of travel</b>			
Operating cost	Decreasing ↘↘	Decreasing ↘	No change →
Price of CO <sub>2</sub> in Emission Trading Scheme	Moderate, increasing ↗	Moderate, increasing ↗	Moderate, Increasing ↗
Price of oil/barrel	Moderate	Moderate	High
Price of SAF	Relatively High ↗	Relatively High ↗	Highest ↗↗
<b>Structure</b>			
Hubs: Mid-East ↗↗		Hubs: Mid-East ↗↗	
Europe ↘ Türkiye ↗		Europe & Türkiye ↗	
Point-to-point: N-Atlantic ↘		Point-to-point: N-Atlantic ↗, European Secondary Airports. ↗	No change →

<sup>4</sup> EUROCONTROL Long-Term Aviation Outlook to 2050, EUROCONTROL, December 2024. (link to the report <https://www.eurocontrol.int/publication/eurocontrol-forecast-2024-2050>)

Market Structure	Industry fleet forecast, Clean Aviation and STATFOR assumptions	Industry fleet forecast, Clean Aviation and STATFOR assumptions	Industry fleet forecast, Clean Aviation and STATFOR assumptions
Fuel mix	In line with ReFuelEU Aviation (2%SAF in 2025 to 70% in 2050)	In line with ReFuelEU Aviation (2% SAF in 2025 to 70% in 2050)	5 years behind ReFuelEU Aviation (0.5%SAF in 2025 to 42% in 2050)

## Update of the EUROCONTROL Aviation Long-Term Outlook to 2050

In November 2023, EUROCONTROL started to work on an update of its EUROCONTROL Aviation Long-Term Outlook to 2050 (EAO). It is an update of the previously published EAO<sup>5</sup> (April 2022), covering the long-term flights and CO<sub>2</sub> emissions forecast to 2050, which was based on 2019 historical flight data. The 2024 edition of the EAO forecast is now based on the latest available actual flight data (2023) and uses the EUROCONTROL seven-year forecast (2024-2030). It includes a complete review of the fleet forecast assumptions as well as a review of other inputs: high-speed rail network development, impact of Sustainable Aviation Fuels (SAF) mandate, jet fuel and CO<sub>2</sub> allowances on ticket prices, as well as future airport capacity constraints.

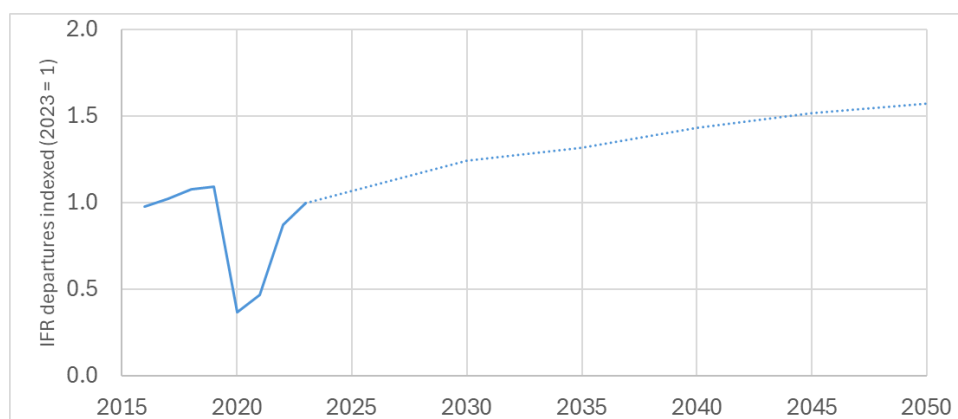
EUROCONTROL also provides an update of its modelling framework and traffic environmental assessment with the IMPACT model including:

- an updated technological freeze baseline operations forecast using only growth and replacement in-production aircraft in the baseline year (traffic and fleet baseline scenario) from 2023 to 2050;
- an updated baseline passenger data (Eurostat). Additional data sources may be required to cover the ECAC region;
- Latest versions of the Aircraft Noise and Performance (ANP) database, BADA, ICAO Aircraft Engine Emissions Database (AEEDB), - versions of March 2024;
- Updated assumptions on future technologies, operational efficiency, SAF (e.g. based on the CAEP/13 Environmental Trends complemented with information on emerging technologies).

**Figure 1** below shows the ECAC scenario of the passenger flight forecasted international departures for both historical (solid line) and future (dashed line) years.

**Figure 1.** Updated EUROCONTROL 'Base' scenario of the passenger flight forecast for ECAC international departures from 2024 to 2050.

<sup>5</sup> EUROCONTROL Aviation Outlook to 2050, EUROCONTROL, April 2022.



### Further assumptions and results for the baseline scenario

The ECAC baseline scenario was generated by EUROCONTROL for all ECAC States. It covers all commercial international passenger flights departing<sup>6</sup> from ECAC airports, as forecasted in the aforementioned traffic 'Base' scenario. The number of passengers per flight is derived from Eurostat data.

EUROCONTROL also generates a forecast for all-cargo flights in its baseline scenario. However, no information about the freight tonnes carried is available. Hence, historical and forecasted cargo traffic have been extracted from another source (ICAO<sup>7</sup>). This data, which is presented below, includes both belly cargo transported on passenger flights and freight transported on dedicated all-cargo flights.

Historical fuel burn and emission calculations are based on the actual flight plans from the PRISME<sup>8</sup> data warehouse used by EUROCONTROL, including the actual flight distance and the cruise altitude by airport pair. These calculations were made with a subset of total passenger traffic (with available and usable information in the flight plans) covering 98% in 2010, and 99% in 2019 and 2030. Determination of the fuel burn and CO<sub>2</sub> emissions for historical years is built up as the aggregation of fuel burn and emissions for each aircraft of the associated traffic sample characteristics. Fuel burn and CO<sub>2</sub> emission results consider each aircraft's fuel burn in its ground and airborne phases of flight and are obtained by use of the EUROCONTROL IMPACT environmental model, with the aircraft technology level of each year.

Forecast years (until 2050) fuel burn and modelling calculations use the 2023 flight plan characteristics as much as possible, to replicate actual flown distances and cruise levels, by airport pairs and aircraft types. When not possible, this modelling approach uses past years traffics too, and, if needed, the ICAO CAEP forecast modelling. The forecast fuel burn and CO<sub>2</sub> emissions of the baseline scenario for forecast years use the technology level of 2023. The usable forecast passenger traffic for calculation represents 99.7% of the total available

<sup>6</sup> International departures only. Domestic flights are excluded. A domestic is any flight between two airports in the State, regardless of the operator or which airspaces they enter en-route. Airports located in overseas are attached the State having the sovereignty of the territory. For example, France domestic include flights to Guadeloupe, Martinique, etc.

<sup>7</sup> ICAO Long-Term Traffic Forecasts, Cargo, Europe, International (excluding Russian Federation, Belarus and Greenland), 2021.

<sup>8</sup> PRISME is the name of the EUROCONTROL data warehouse hosting the flight plans, fleet and airframe data.

passenger traffic.

For each reported year, the revenue per passenger kilometre (RPK) calculations use the number of passengers carried for each airport pair multiplied by the great circle distance between the associated airports and expressed in kilometres. Because of the coverage of the available passenger estimation datasets (Scheduled, Low-cost, Non-Scheduled flights, available passenger information, etc.) these results are determined for 96% of the historical passenger traffic in 2010, 97% in 2019, 99% in 2023, and around 99% of the passenger flight forecasts.

From the RPK values, the passenger flights RTK can be calculated as the number of tonnes carried by kilometres, assuming that one passenger corresponds to 0.1 tonne.

The fuel efficiency represents the amount of fuel burn divided by the RPK for each available airport pair with passenger data, for the passenger traffic only. Therefore, the fuel efficiency can only be calculated for city pairs for which the fuel burn and the RPK values exists<sup>9</sup>.

The following tables and figures show the results for this baseline scenario, which is intended to serve as a reference case by approximating fuel consumption and CO<sub>2</sub> emissions of European aviation in the absence of mitigation actions.

**Table 2.** Baseline forecast for international traffic departing from ECAC airports

Year	Passenger Traffic (IFR movement) (million)	Revenue Passenger Kilometres <sup>10</sup> RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres transported <sup>11</sup> FTKT (billion)	Total Revenue Tonne Kilometres <sup>12</sup> RTK (billion)
2010	4.71	1,140	0.198	41.6	155.6
2019	5.88	1,874	0.223	46.9	234.3
2023	5.38	1,793	0.234	49.2	228.5
2030	6.69	2,176	0.262	55.9	273.5
2040	7.69	2,588	0.306	69.0	327.8
2050	8.46	2,928	0.367	86.7	379.5

<sup>9</sup> Dividing the Fuel by the RPK results of the tables presented in this document is not suitable to estimate the fuel efficiency (traffic coverage differences). The presented result has been calculated on an airport pair basis.

<sup>10</sup> Calculated on the basis of Great Circle Distance (GCD) between the airports of the available passenger reports (subset of the global traffic; from 97% in 2010 up to 99% for the forecast years).

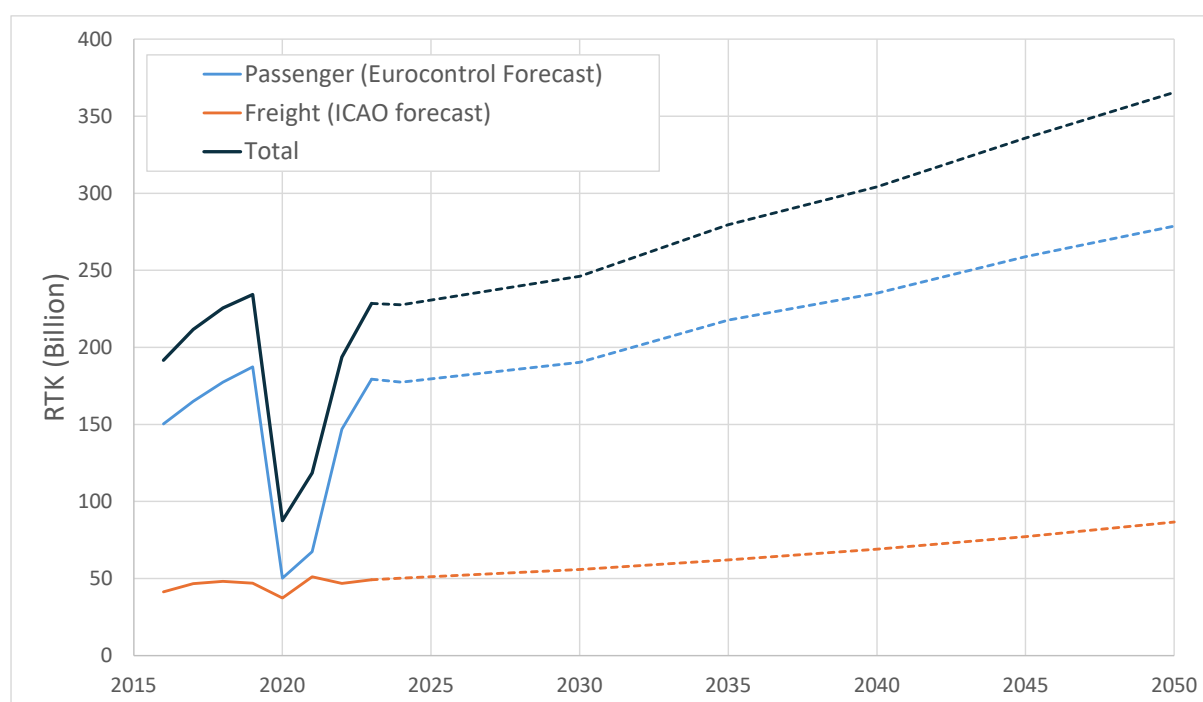
<sup>11</sup> Includes passenger and freight transport (on all-cargo and passenger flights).

<sup>12</sup> A value of 100 kg has been used as the average mass of a passenger incl. baggage (ref: ICAO).



**Table 3.** Fuel burn and CO<sub>2</sub> emissions forecast for the baseline scenario

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	0.0327	0.327
2019	53.30	168.42	0.0280	0.280
2023	48.41	152.96	0.0268	0.268
2030	54.46	172.10	0.0250	0.250
2040	62.19	196.52	0.0240	0.240
2050	69.79	220.54	0.0238	0.238
<i>For reasons of data availability, results shown in this table do not include cargo/freight traffic.</i>				

**Figure 2.** Forecasted traffic until 2050 (assumed both for the baseline and implemented measures scenarios)

Although data are not shown in **Table 2**, the number of flights between 2019 and 2023 in **Figure 2** is reflecting the impact of the COVID-19 starting in 2020. If the passenger segment has been drastically affected by the outbreak, the freight segment seemed more immune.

As detailed by the **Table 3**, from 2010 to 2019, the CO<sub>2</sub> emissions increased from 120 to 168 million tonnes, corresponding to an annual growth rate of 3.8%. In 2023, due to the impact of the COVID-19 crisis on the traffic, the CO<sub>2</sub> emissions were lower than the 2019 level, with 153 million tonnes. For the forecast years, the estimated CO<sub>2</sub> emissions of the

ECAC Baseline scenario would increase from 172 million tonnes in 2030 to 220 million tonnes in 2050 (corresponding to annual growth rate of 1.25%).

The fuel efficiency improvement is expected to be less important in the forecast years (annual growth rate of 0.4% between 2023 and 2050) than between 2010 and 2023 (1.5% per year), mainly due to the entry into service of the new generation aircraft families (e.g. MAXs, NEOs).

## 2. ECAC Scenario with Implemented Measures: Estimated Benefits

To improve fuel efficiency and to reduce future air traffic emissions beyond the projections in the baseline scenario, ECAC States have taken further action. Assumptions for a top-down assessment of the effects of mitigation actions are presented here, based on modelling results by EUROCONTROL and EASA. Measures to reduce aviation's fuel consumption and emissions will be described in the following chapters.

For reasons of simplicity, the scenario with implemented measures is based on the same traffic volumes as the baseline case, i.e. updated EUROCONTROL's 'Base' scenario described earlier. Unlike in the baseline scenario, the effects of aircraft-related technology development and improvements in ATM/operations as well as SAF are considered here for a projection of fuel consumption and CO<sub>2</sub> emissions up to the year 2050.

Effects of **improved aircraft technology** are captured by simulating fleet roll-over and considering the fuel efficiency improvements of the expected future aircraft types with conventional engines (e.g. Boeing 777X, reengineered Airbus A321Neo, etc..) and powered by hybrid electric and hydrogen engines. The simulated future fleet of aircraft has been generated using the Aircraft Assignment Tool<sup>13</sup> (AAT) developed collaboratively by EUROCONTROL, EASA and the European Commission. The retirement process of AAT is performed year by year, allowing the determination of the number of new aircraft required each year.

This technical improvement is modelled by a constant annual improvement of fuel efficiency of 1.16% per annum is assumed for each aircraft type, with entry into service from 2024 onwards. This rate of improvement corresponds to the 'Advanced' fuel technology scenario used by CAEP to generate the fuel trends for the Assembly. This modelling methodology is applied to the years 2030 to 2050. In addition, the entry into service of hybrid electric and hydrogen aircraft types in the traffic induce a percentage of baseline fuel consumption reduction ramping up from 0% in 2035 to 5% in 2050.

The effects of improved **ATM efficiency** are captured in the Implemented Measures Scenario based on the European ATM Master Plan, managed by SESAR 3. This document defines a common vision and roadmap for ATM stakeholders to modernise and harmonise European ATM systems, including an aspirational goal to reduce average CO<sub>2</sub> emission per flight by 5-10% (0.8-1.6 tonnes) by 2035 through enhanced cooperation. Improvements in ATM system efficiency beyond 2023 were assumed to bring reductions in full-flight CO<sub>2</sub> emissions gradually ramping up to 5% in 2035 and 10% in 2050. These reductions are applied on top of those coming from aircraft/engine technology improvements.

The yet un-estimated benefits of Exploratory Research projects<sup>14</sup> are expected to increase the overall future fuel savings.

While the effects of **introduction of SAF** were modelled in previous updates on the basis of the European ACARE goals<sup>15</sup>, the expected SAF supply objectives for 2020 were not met.

<sup>13</sup> <https://www.easa.europa.eu/domains/environment/impact-assessment-tools>

<sup>14</sup> See SESAR Exploratory Research projects - <https://www.sesarju.eu/exploratoryresearch>.

<sup>15</sup> <https://www.acare4europe.org/sria/flightpath-2050-goals/protecting-environment-and-energy-supply-0>

In the current update, the SAF benefits are modelled as a European regional common measure applied to the EU27+EFTA international traffic. It assumes that the minimum shares of SAF laid down in ReFuelEU Aviation Regulation would be met in the base scenario. According to the Regulation, the percentage of SAF used in air transport gradually ramps from 2% in 2025, up to 20% in 2035 and 70% in 2050. A decarbonation factor value of 70% of CO<sub>2</sub> emissions is expected for synthetic aviation fuels and 65% for aviation biofuels. As the SAF-related calculations can only be applied for countries that are expected to implement regional regulations (e.g. ReFuelEU Aviation), **the tank-to-wake Net CO<sub>2</sub> emissions are reported in the Appendix A of this document for EU27+EFTA international traffic only.**

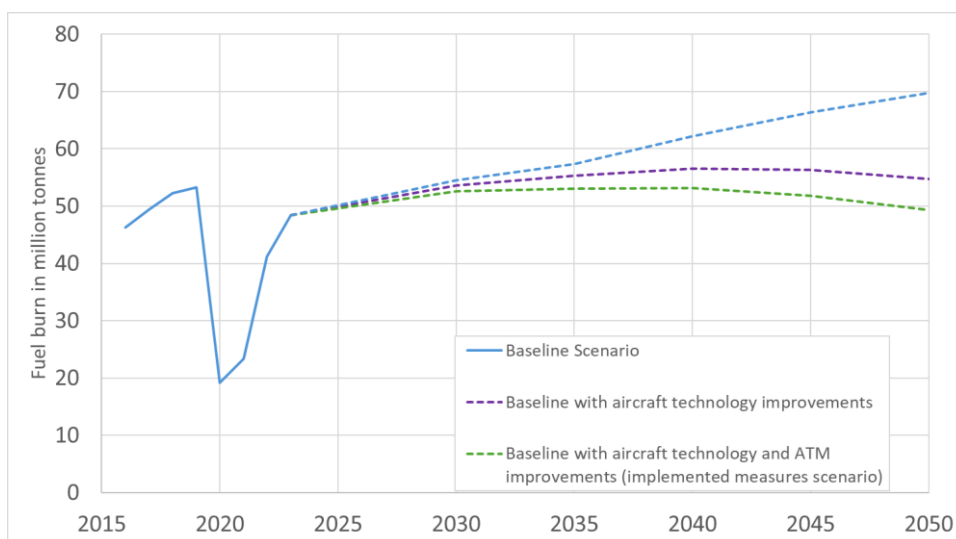
However, numerous initiatives related to SAF (e.g. ReFuelEU Aviation) are largely described in **Section B Chapter 2** and it is expected that future updates will include an assessment of its benefits as a collective measure.

Effects on aviation's CO<sub>2</sub> emissions of **market-based measures** including the EU Emissions Trading System (ETS) with the linked Swiss ETS, the UK ETS and the ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) have not been modelled explicitly in the top-down assessment of the implemented measures scenario presented here. CORSIA aims for carbon-neutral growth (CNG) of aviation, and this target is therefore shown in **Figure 4**<sup>16</sup>.

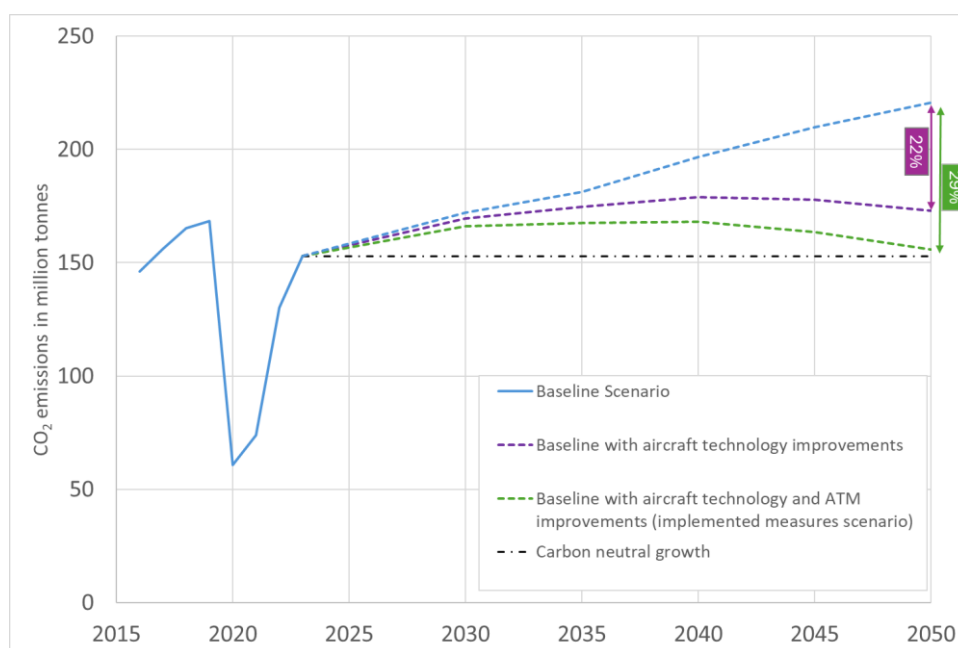
The EU ETS quantifications are described in more details in Section B Chapter 4.

**Tables 4-6, Figure 3 and Figure 4** summarize the results for the scenario with implemented measures. It should be noted that **Table 4** and **Table 6** show direct combustion emissions of CO<sub>2</sub> (assuming 3.16 kg CO<sub>2</sub> per kg fuel). More detailed tabulated results are found in **Appendix A**, including results expressed in equivalent CO<sub>2</sub> emissions on a well-to-wake basis (for comparison purposes of SAF benefits).

**Figure 3.** Fuel consumption forecast for the baseline and implemented measures scenarios (international passenger flights departing from ECAC airports).



<sup>16</sup> Note that in a strict sense the CORSIA target of CNG is aimed to be achieved globally (and hence not necessarily in each world region).

**Figure 4.** CO<sub>2</sub> emissions forecast for the baseline and implemented measures scenarios

As shown in **Figure 3** and **Figure 4**, the impact of improved aircraft technology indicates an overall 22% reduction of fuel consumption and CO<sub>2</sub> emissions in 2050 compared to the baseline scenario. Overall CO<sub>2</sub> emissions, including the effects of new aircraft types (conventional, hybrid electric and Hydrogen) and ATM-related measures, are projected to lead to a 29% reduction in 2050 compared to the baseline.

**Table 4.** Fuel burn and CO<sub>2</sub> emissions forecast for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	0.0327	0.327
2019	53.30	168.42	0.0280	0.280
2023	48.41	152.96	0.0268	0.268
2030	52.57	166.11	0.0241	0.241
2040	53.20	168.11	0.0205	0.205
2050	49.29	155.75	0.0168	0.168

*For reasons of data availability, results shown in this table do not include cargo/freight traffic.*

As detailed in **Table 5**, under the currently assumed aircraft and ATM improvement scenarios, the fuel efficiency is projected to lead to a 37% reduction from 2023 to 2050. The annual rate of fuel efficiency improvement is expected to be at 1.5% between 2023 and 2030 and

reach 2% between 2040 and 2050. However, aircraft technology and ATM improvements alone will not be sufficient to meet the post-2020 carbon neutral growth objective of ICAO, nor will the use of alternative fuels, even if Europe's ambitious targets for alternative fuels (SAF) are met. This confirms that additional action, particularly market-based measures, are required to fill the gap.

**Table 5.** Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

Period	Average annual fuel efficiency improvement (%)
2010-2023	-1.50%
2023-2030	-1.51%
2030-2040	-1.60%
2040-2050	-1.98%

The **Table 6** below summarises the cumulated effects of each implemented measure. It identifies the weight of the technical improvement on the reduction of CO<sub>2</sub> emissions (from 2% in 2030 to 22% in 2050 compared to the Baseline scenario). The overall impact of the implemented measures (aircraft technology improvements and ATM) shows a reduction of CO<sub>2</sub> emissions by 29% in 2050 compared to the Baseline scenario.

**Table 6.** Summary of CO<sub>2</sub> emissions forecast for the scenarios described in this chapter

Year	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)			% improvement by Implemented Measures (full scope)
	Baseline Scenario	Implemented Measures Scenario		
		Aircraft technology improvements only	Aircraft technology and ATM improvements	
2010	120.34			
2019	168.42			
2023	152.96			
2030	172.10	169.50	166.11	-3%
2040	196.52	178.84	168.11	-14%
2050	220.54	173.06	155.75	-29%
For reasons of data availability, results shown in this table do not include cargo/freight traffic.				

The section **Appendix A** of this document provides the detailed results for each scenario, Baseline, and by implemented measure, as well as the CO<sub>2</sub> equivalent and EU27+EFTA Net CO<sub>2</sub> emissions.

## **B. ACTIONS TAKEN COLLECTIVELY IN EUROPE**

1. TECHNOLOGY AND DESIGN
2. SUSTAINABLE AVIATION FUELS (SAF)
3. AIR TRAFFIC MANAGEMENT AND OPERATIONAL IMPROVEMENTS
4. MARKET-BASED MEASURES
5. ADDITIONAL MEASURES



## 1. TECHNOLOGY AND DESIGN

- There have been a limited number of new certified large transport aircraft and engine types over the last few years with marginal environmental improvements, while deliveries of the latest generation of aircraft continue to penetrate the European fleet.
- Certification of all in-production aircraft types against the ICAO CO<sub>2</sub> standard is required by 1 January 2028, which is leading to an increase in activities within this area.
- Environmental technology standards will be important in influencing new aircraft-engine designs and contributing to future sustainability goals.
- In February 2025 the ICAO CAEP is aiming to agree on new aircraft noise and CO<sub>2</sub> limits that would become applicable in the next five years.
- ICAO independent experts medium-term (2027) and long-term (2037) technology goals were agreed in 2019 and are becoming outdated.
- Emissions data measured during the engine certification process acts as an important source of information to support modelling of operational emissions in cruise.
- There have been further developments within the low carbon emissions aircraft market (e.g. electric, hydrogen), with support from the Alliance for Zero-Emissions Aircraft to address barriers to entry into service and facilitate a potential reduction in short / medium-haul CO<sub>2</sub> emissions of 12% by 2050.
- EASA has published noise measurement Guidelines and Environmental Protection Technical Specifications in order to respond to the emerging markets of Drones and Urban Air Mobility.
- EASA has launched a General Aviation Flightpath 2030+ program to accelerate the transition of propulsion technology, infrastructure and fuels to support sustainable operations.
- Horizon Europe, with a budget of €95 billion, is funding collaborative and fundamental aviation research, as well as partnerships (e.g. Clean Aviation, Clean Hydrogen) who are developing and demonstrating new technologies to support the European Green Deal.



The European Union Aviation Safety Agency (EASA) develops and implements aircraft environmental certification standards [1, 2, 3, 4] that manufacturers have to comply with in order to register their products within the EU and EFTA States.

The recent certification of new types of large transport aircraft and engines has continued to be focused on performance improvement packages for aircraft certified in the 2010s (e.g. Airbus A350, A330neo and A320neo; Boeing 737MAX and 787). The penetration of these aircraft types into the European fleet has slowed due to reduced annual deliveries following the COVID crisis and the average margin to the latest noise standard of the new deliveries is levelling off. In contrast, there has been increased research and certification activity in emerging markets such as zero carbon emission aircraft (e.g. electric and hydrogen powered aircraft).

## **1.1 Aircraft environmental standards**

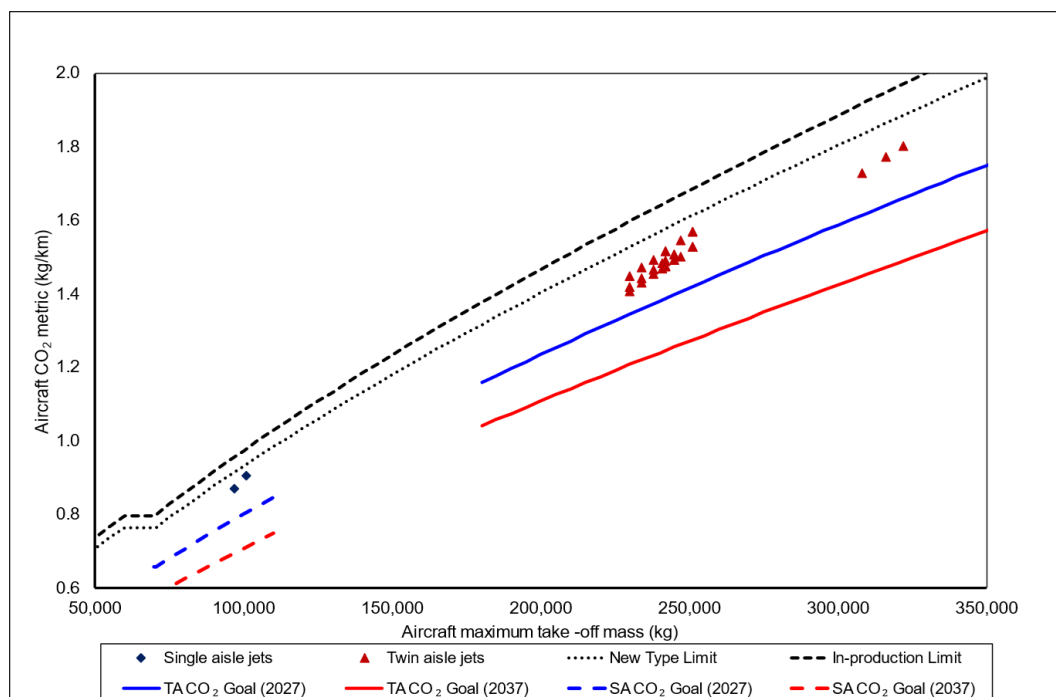
### **1.1.1 Aircraft CO<sub>2</sub> emissions**

Since 1 January 2020, new aircraft types have to comply with a new type CO<sub>2</sub> standard<sup>17</sup>, although no aircraft has been certified against this standard as of the start of 2025. The focus thus far has been on certifying in-production aircraft types against a less stringent in-production CO<sub>2</sub> standard as all aircraft have to be certified against this new requirement if they wish to continue to be produced beyond 1 January 2028.

As of the end of 2024, Airbus continues to be the only manufacturer to have certified in-production aircraft types, such as the A330-800neo and -900neo variants (Figure 1.4), and so the availability of certified CO<sub>2</sub> data remains limited [5]. In light of the approaching production cut-off deadline in 2028, certification of other aircraft types is ongoing by EASA and other regions of the world have also implemented the CO<sub>2</sub> standard into their legislation with it becoming effective in the US on 16 April 2024. The 2019 ICAO Independent Experts Panel goals for leading edge CO<sub>2</sub> emissions performance in 2027 and 2037 would need to be reviewed soon for them to remain relevant.

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<sup>17</sup> ICAO Annex 16, Volume III to the Chicago Convention contains international aircraft CO<sub>2</sub> standards. The CO<sub>2</sub> metric is a specific air range-based metric (kg fuel per km flown in cruise) adjusted to take into account fuselage size.

**Figure 1.1 Certified aircraft CO<sub>2</sub> emissions performance**

### ICAO dual Noise / CO<sub>2</sub> standard setting

A revision of the ICAO Annex 16 standards for aircraft noise and CO<sub>2</sub> emissions is currently being considered by the ICAO Committee on Aviation Environmental Protection (CAEP). This is the first time that CAEP standard setting has reviewed two standards at the same time in the form of an integrated dual stringency process taking into account design trade-offs at the aircraft level. The environmental benefits and associated costs of a broad range of options for more stringent new type standards have been assessed for an applicability date in the next 5 years. A recommendation by CAEP on new noise and CO<sub>2</sub> limits is due at the CAEP/13 meeting in February 2025.



Considering the long-term development and in-service timescales of new aircraft types, it will be important to set an updated new type CO<sub>2</sub> standard that will influence the fuel efficiency of future designs and effectively contribute to the ICAO Long-Term Aspirational Goal of net zero carbon emissions from international aviation by 2050 [6].



## 1.2 Low carbon emissions aircraft

In recent years, EASA has received an increasing number of enquiries with regard to the certification of novel aircraft configurations and sources of propulsion with zero carbon emissions in operation when produced with renewable energy.

### 1.2.1 Electric propulsion

Regarding Vertical take-off and landing Capable Aircraft (VCA – otherwise known as Urban Air Mobility or Advanced Air Mobility vehicles), EASA has recently published two Environmental Protection Technical Specifications (EPTS), which both underwent public consultation. The first EPTS, published in 2023, addresses VCA with non-tilting rotors [7], covering designs such as the Volocopter VoloCity or Airbus CityAirbus. The second EPTS, published in 2024, was for VCA powered, at least partially, by tilting rotors [8], covering designs such as the Lilium Jet. These two EPTS cover the majority of VCA designs currently envisioned and will be utilized in the corresponding noise certification programs. They were derived from legacy noise standards for large helicopters and tilt rotors, adapted to the VCA characteristics and expanded on to include hover condition measurement points. The same noise limits as for large helicopters are being used until more data can be collected. Ultimately, an EU Delegated Act will aim at incorporating the content of these EPTS into EASA noise regulations.

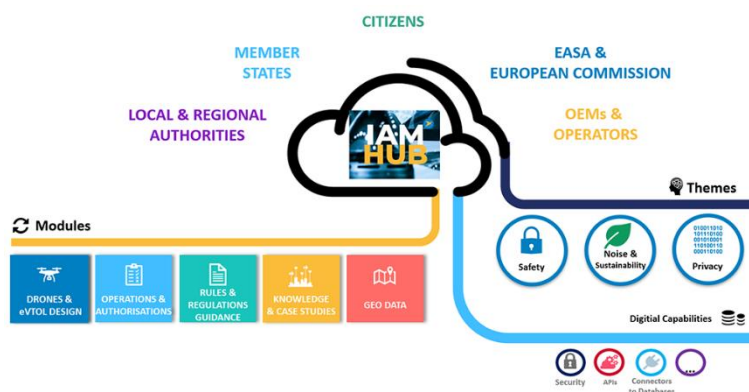


While applications to EASA for electric powered aircraft have increased, there have been few completed general aviation programs since the noise certification of the Pipistrel Velis Electro in 2020, aside from the LAK-17 self-launching sailplane in 2023, due to continuing challenges in increasing battery energy density to reduce weight and increase range. For both products, the legacy noise standards of ICAO Annex 16, Chapter 10 were used with small adjustments. This technology can lead to a 10-decibel noise reduction compared to equivalent piston-engine aircraft, which is perceived as 50% quieter.

### EASA Innovative Air Mobility Hub

The EASA Innovative Air Mobility (IAM) Hub [9] is a unique digital platform, developed by a dedicated Task Force that brings together all actors in the European system including cities, regions, National authorities, the EU, operators and manufacturers. The primary goal is to facilitate the safe, secure, efficient, and sustainable implementation of IAM (e.g. Drones, UAMs) practices.

The platform currently comprises of five modules, including Drone and eVTOL Design, Rules and Regulations, Knowledge and Info Cards, Operational Information and Geographical Data



such as population data. Various strategies have been deployed to mitigate the environmental impacts from UAS and VCA (e.g. regulations, no-fly zones, geofencing, altitude restrictions, remote identification) with a goal to balance the benefits of these new technologies with the need to protect EU citizens. A methodology to underpin a full life-cycle environmental assessment of IAM

aircraft, known as Environmental Footprint Aviation, is also being developed [10].

### 1.2.2 Hydrogen-powered Aircraft

The potential of hydrogen to power carbon-free flight has rekindled interest in this alternative fuel, with green hydrogen being relatively easy to produce, provided sufficient renewable energy is available. In particular, there has been a strong interest in the potential of hydrogen used in conjunction with fuel cells and electric motors for regional / short-haul aviation, where the weight of batteries needed for energy storage is currently seen by many as restrictive.

Pioneers in the field have advanced their flight test activity, with H2FLY conducting the world's first piloted flight of a liquid hydrogen powered electric aircraft in September 2023, using their HY4 demonstrator aircraft, operating from Maribor in Slovenia. Other notable flights include ZeroAvia's flight test campaign using a Dornier 228 with the left side propeller powered by their ZA600 prototype engine and, most recently, Beyond Aero achieved France's first manned fully hydrogen-electric flight, using a retrofit model G1 SPYL-XL to demonstrate their technology.



Although the headlines have primarily been related to these aforementioned flight tests using fuel cells, there has also been demonstrable progress on hydrogen combustion technology with Rolls Royce, Safran and GE all successfully running ground tests in this field.

### 1.2.3 Alliance for Zero Emission Aviation

The Alliance for Zero Emission Aviation (AZEA) was launched in June 2022 and aims to prepare the aviation ecosystem for the entry into service of hydrogen and electric aircraft [10]. It contains 181 Members representing industry, standardisation and certification agencies, research bodies, environmental interest groups and regulators. AZEA members jointly work to identify barriers to entry into commercial service of these aircraft, establish recommendations and a roadmap to address them, promote investment projects and create synergies and momentum amongst members.



In June 2023, AZEA published an overview of the current aviation regulatory landscape for hydrogen and electric aircraft [11], which describes the activities that EASA is doing to adapt the aviation regulatory framework to facilitate the entry into the market of aircraft that use electric or hydrogen propulsion. To support the introduction of disruptive technologies, innovative concepts (including ground and air operations) or products, whose feasibility may need to be confirmed, and for which an adequate regulatory framework does not yet exist or is not mature, EASA is engaging with future applicants through various Innovation Services [12].

With performance-based regulations there is a higher need for supporting industry standards for regulatory compliance and interoperability. As such, AZEA has also published a document mapping existing standards and committees working in this area, including EUROCAE, SAE and ASTM [13]. Further work to identify where new standards are needed is on-going and will serve as a resource for Standards Development Organizations and industry stakeholders to identify opportunities for collaboration and harmonization of activities.

In January 2024, AZEA published its Concept of Operation (CONOPS) for the introduction of electric, hybrid-electric and hydrogen powered aircraft [14]. This addresses the challenges and opportunities arising from the integration of these new market segments into the European aviation system, covering all components of the European Air Traffic Management network, in particular airports. The CONOPS is expected to be reassessed once robust aircraft performance data becomes available.

The AZEA vision "Flying on Electricity and Hydrogen in Europe" published in June 2024 [15] has developed a baseline scenario that, while recognising that long-haul flights relying on these power sources cannot be anticipated before 2050, predicts approximately 5000 electric and hydrogen aircraft (excluding urban air mobility vehicles and helicopters) will be delivered to European operators between now and 2050, leading to a reduction in short and medium-haul CO<sub>2</sub> emissions of 12%. While there are considerable challenges requiring the collaboration of all stakeholders, beyond these hurdles is an opportunity to reshape the aviation sector and to pioneer a sustainable future.

**Figure 1.2 ATAG** indicative overview of where low- and zero-carbon energy could be deployed in commercial aviation alongside that of SAF [16]

	2020	2025	2030	2035	2040	2045	2050
<b>Commuter</b> » 9-19 seats » < 60 minute flights » <1% of industry CO <sub>2</sub>	SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF
<b>Regional</b> » 50-100 seats » 30-90 minute flights » ~3% of industry CO <sub>2</sub>	SAF	SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF
<b>Short haul</b> » 100-150 seats » 45-120 minute flights » ~24% of industry CO <sub>2</sub>	SAF	SAF	SAF	SAF potentially some Hydrogen	Hydrogen and/or SAF	Hydrogen and/or SAF	Hydrogen and/or SAF
<b>Medium haul</b> » 100-250 seats » 60-150 minute flights » ~43% of industry CO <sub>2</sub>	SAF	SAF	SAF	SAF	SAF potentially some Hydrogen	SAF potentially some Hydrogen	SAF potentially some Hydrogen
<b>Long haul</b> » 250+ seats » 150 minute + flights » ~30% of industry CO <sub>2</sub>	SAF	SAF	SAF	SAF	SAF	SAF	SAF

### 1.3 Supersonic aircraft

Following the retirement of Concorde in 2003, several manufacturers have been looking into developing supersonic business jets, with some currently looking at an entry into service date of around 2030. Key environmental challenges to address include the use of significantly more fuel on a per passenger kilometre basis compared to subsonic commercial aircraft [17], and noise, specifically the impact of the sonic boom generated when flying at supersonic speed.

### 1.4 General Aviation Sustainability Roadmap

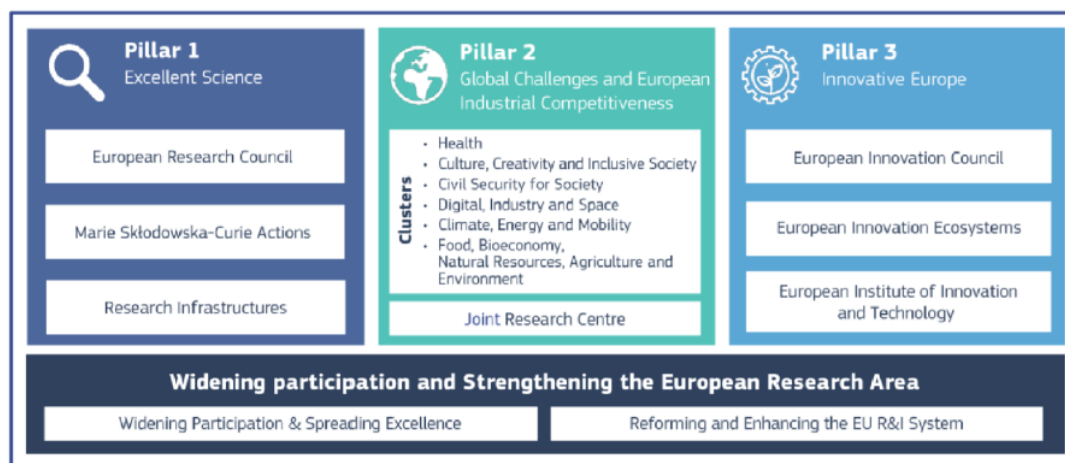
EASA is dedicated to making General Aviation (GA) more sustainable. Building on the success of the past GA Roadmap, the Agency has launched the new GA Flightpath 2030+ program in 2024 [18]. GA is seen as a cradle for development, testing, and industrialization of innovations that, when tested and implemented operationally, can drive improvements across the entire aviation sector in safety and sustainability.

The 'Greener Faster' initiative is designed to achieve sector-wide agreement on what sustainable GA means and how everyone can work together to accelerate the transition of GA propulsion technology, infrastructure and fuels to support sustainable operations and the objective of carbon-free aviation by 2050. This will be complemented by the 'Fly Direct' initiative that aims to optimize GA operations in the airspace by removing unnecessary operational restrictions, allowing aircraft to safely navigate the most efficient and environmentally friendly routes.



## 1.5 Research and Innovation Programmes

Aviation environmental research is embedded in European, National and industry research programmes. At EU level, most research is currently funded through 'Horizon Europe' (2021-2027) with an initial budget of €95.5 billion [19]. Aviation specific research contributes primarily to the European Green Deal and the EU's digital and competitiveness strategies across all three Horizon Europe pillars.



- **Pillar I:** European Research Council science, which often advances the limits of science and technology (e.g. new materials, breakthrough physical processes, artificial intelligence and quantum computing, sensor technologies);
- **Pillar II:** Cluster 5 aviation programme has been the foundation of aeronautics research for over 35 years, including relevant partnerships (e.g. Clean Aviation, Clean Hydrogen and SESAR), industry-led technology demonstrators and Cluster 4 synergies (Digital, Industry and Space); and
- **Pillar III:** European Innovation Council research actions, with emphasis on supporting and connecting SMEs and the aviation supply chain.

The collaborative and fundamental Pillar II Cluster 5 aviation environmental research develops and derisks technologies up to a Technology Readiness Level (TRL) 4, to be taken further by Horizon Europe partnerships, national or industry programmes. The current research is focused on:

- lightweight, multifunctional and intelligent airframe and engine parts
- holistic digital framework for optimized design, manufacturing and maintenance
- uncertainties quantification for design, manufacturing and operation
- ultra-efficient aircraft propulsion
- electrified and hydrogen-enabled propulsion
- fuel-flexible combustion systems and cryogenic liquid hydrogen storage
- better understanding and mitigating non-CO<sub>2</sub> emissions, with emphasis on contrails
- reduction of NO<sub>x</sub> and particulate matter emissions
- Noise reduction technologies and abatement procedures



One such Horizon Europe project is HESTIA [20] that focuses on increasing the scientific knowledge of the hydrogen-air combustion of future hydrogen-fuelled aero-engines. Another example is BeCoM [21] which addresses the uncertainties related to the forecasting of persistent contrails and their weather-dependent individual radiative effects, in order to develop recommendations on how to implement strategies that enable air traffic management to reduce aviation's climate impact. Further information on the extensive projects funded under Horizon Europe research programme can be found on the European Commission website [22].

### Clean Sky 2 (part of 'Horizon 2020' – 2014 to 2020)

The Clean Sky 2 projects (2014-2024) had a combined public and private budget of around €4 billion, with EU funding up to €1.75 billion [23]. Its objectives were to develop, demonstrate, and accelerate the integration of technologies capable of reducing CO<sub>2</sub>, NO<sub>x</sub> and Noise emissions by 20 to 30% compared to 'state-of-the-art' aircraft in 2014.



The benefits and potential impact from Clean Sky 2 research at the aircraft, airport and fleet level are evaluated through a dedicated Technology Evaluator function with key assessment and reporting duties. The final assessment by the Technology Evaluator was performed in 2024 [24] and the results are summarised in Table 1.1.

**Table 1.1 Final** Clean Sky 2 Technology Evaluator Assessment Results

Mission Level Assessment				
Concept Model	Assessment	CO <sub>2</sub> <sup>1</sup>	NO <sub>x</sub> <sup>1</sup>	Noise <sup>2</sup>
<b>Long Range (LR+)</b>	1st	-13%	-38%	<-20%
	2nd	<b>-18.2%</b>	<b>-44.9%</b>	<b>-20.1%</b>
<b>Short-Medium Range (SMR+ &amp; SMR++)</b>	1st	-17% to -26%	-8% to -39%	-20% to -30%
	2nd	<b>-25.8% to -30.4%</b>	<b>-2.3% to -5.1%</b>	<b>-11.5% to -16.3%</b>
<b>Regional (TP90 -TP130 - MM TP70)</b>	1st	-20% to -34%	-56% to -67%	-20% to -68%
	2nd	<b>-25% to -32.5%</b>	<b>-44% to -60%</b>	<b>+14% to -44%</b>
<b>Commuter<sup>3</sup> &amp; BJ</b>	1st	-21% to -31%	-27% to -28%	-20% to -50%
	2nd	<b>-17.3% to -19.6%</b>	<b>-16.5% to -51.5%</b>	<b>-19% to -31%</b>

- (1) CO<sub>2</sub> and NO<sub>x</sub> values per passenger-kilometre.
- (2) Averaged Perceived Sound Volume Reduction (EPNLdB) according to ICAO Annex 16 conditions for fixed-wing aircraft (Chapter 10 for CS-23 aircraft and Chapter 14 for CS-25 aircraft). 20% noise reduction is equivalent to 3dB reduction. 30% of noise reduction is equivalent to 5dB reduction.
- (3) Only fossil fuel concepts, excluding the innovative E-Short Take-Off and Landing (STOL) hybrid-electric commuter concept.

Airport Level Assessment			
Assessment	CO <sub>2</sub>	NO <sub>x</sub>	Noise Area
1st	-8% to -13.5%	-6.5% to -10.5%	-10% to -15%
2nd	-11.5 to -15%	-10.5 to -14.5%	-8% to -17% (Lden <sup>1</sup> )

(1) Surface area Reduction of Lden contours for 60-65 dB(A) noise levels at the European airports considered.

Fleet Level Assessment			
Assessment	CO <sub>2</sub>	NO <sub>x</sub>	Fleet Renewal
1st	-14% to -15%	-29% to -31%	70% to 75% (ASK)
2nd	-14.5%	-29%	71.4% (ASK) 61.6% (a/c)

### Clean Aviation (part of 'Horizon Europe' – 2021 to 2027)

Clean Aviation was established in November 2021 under EU Horizon Europe to support the EU ambition of climate neutrality by 2050 [25]. The Clean Aviation programme aims to develop disruptive aircraft technologies that will deliver net greenhouse gas (GHG) reductions of no less than 30%, compared to 2020 state-of-the-art aircraft.

The targets have been extended to CO<sub>2</sub> and non-CO<sub>2</sub> effects (nitrogen oxides, water vapour, particulates, contrails, etc.) and EASA is working with Clean Aviation to convey these benefits in the context of the ICAO Annex 16 environmental certification requirements. The technological and industrial readiness aims to allow deployment of these new aircraft no later than 2035, enabling 75% of the world's civil aviation fleet to be replaced by 2050.



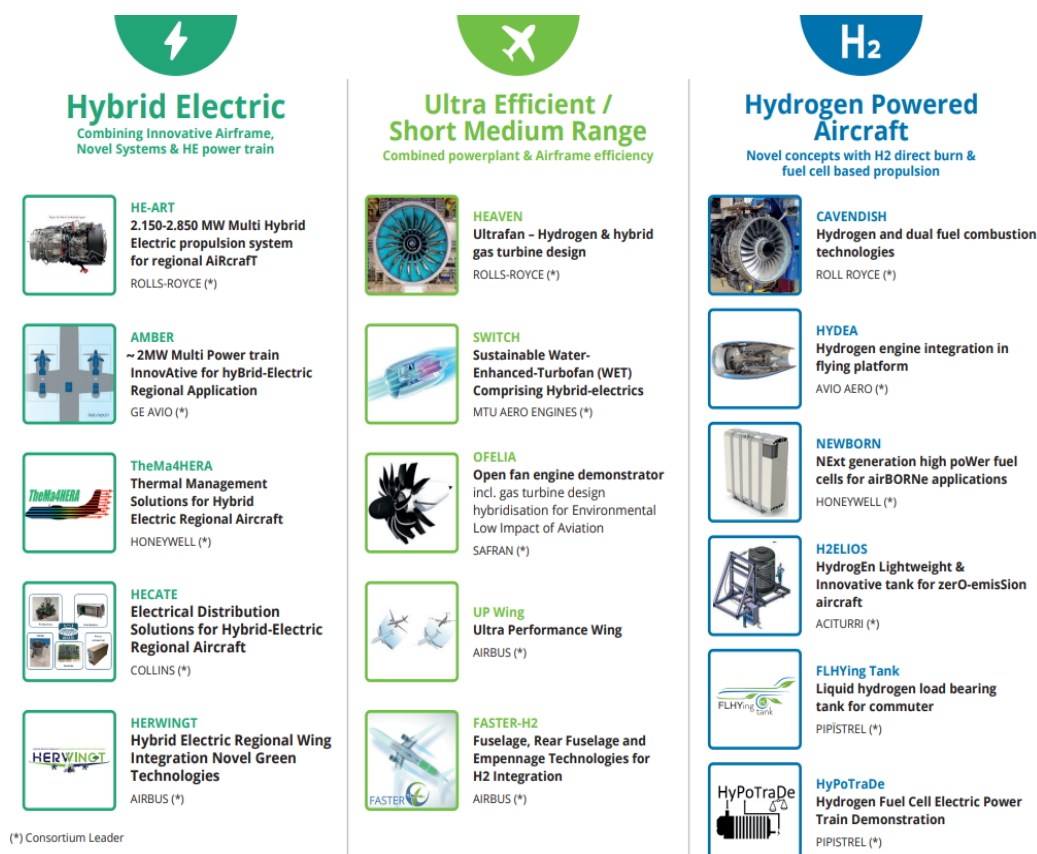
Clean Aviation will focus on three key areas of hybrid electric and full electric architectures, ultra-efficient aircraft architectures and disruptive technologies to enable hydrogen-powered aircraft. The targeted performance levels are summarised in Table 1.2 [26].

**Table 1.2 Clean Aviation Targets**

Aircraft Category	Key technologies and architectures to be validated at aircraft level in roadmaps	Entry Into Service Feasibility	CO <sub>2</sub> Emissions reduction (technology based) <sup>28</sup>	Net CO <sub>2</sub> Emissions reduction (i.e. including SAF effect) <sup>29</sup>	Current share of air transport system emissions
<b>Regional Commercial Aircraft</b>	> Hybrid-electric (SAF + Batteries) coupled with highly efficient aircraft configuration	~2035	-30%	-86%	~5%
	> Same with H2-electric power injection (Fuel Cells electric generation)	Beyond 2035	Up to -50%	Up to -90%	
<b>Short-Medium Range Commercial Aircraft</b>	Advanced ultra-efficient aircraft configuration and ultra-efficient gas turbine engines	~2035	-30%	-86%	~50%
<b>Hydrogen-Powered Commercial Aircraft</b>	Full hydrogen-powered aircraft (H2 Fuel Cells or H2-combustion)	~2035	-100%	N/A	N/A

28. Improvement targets are defined as CO<sub>2</sub> reduction compared to 2020 state-of-the-art aircraft available for order/delivery.

29. Assumes full use of SAF at a state-of-the-art level of net 80% carbon footprint reduction (and where applicable, zero-carbon electric energy for batteries charging and green hydrogen production).

**Figure 1.3 Initial projects launched in 2023 to deliver important technology bricks in all three areas**

## STAKEHOLDER ACTIONS

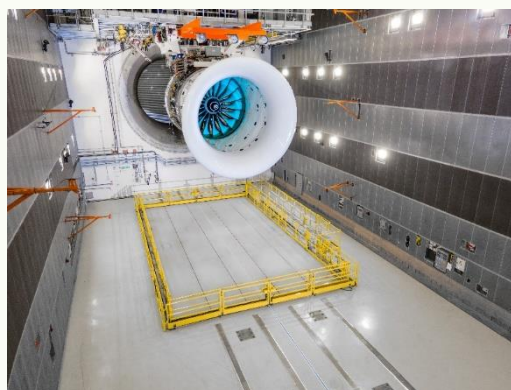
### AeroSpace and Defence Industries Association of Europe (ASD)



ASD includes 25 major European companies and 25 National Associations as our members, with an overall representation of up to 4,000 companies across 21 European countries. In 2022, ASD Members employed 921,000 people and generated a turnover of €261 billion.

### UltraFan® Technology Demonstrator

Rolls-Royce has successfully run its UltraFan® technology demonstrator to maximum power during 2023. The initial stage of the test was conducted using 100% Sustainable Aviation Fuel (SAF). UltraFan® delivers a 10% efficiency improvement over the Trent XWB engine and a 25% efficiency gain since the launch of the first Trent engine. Testing has been supported by various partners, including the EU Clean Sky programmes.



### Hydrogen Fuel Cells

Airbus has performed ground testing to achieve the milestone of running a fuel cell engine concept at full power (1.2 Mega-Watts). This is the most powerful fuel cell test ever in the aviation sector, coupling 12 fuel cells to reach the output needed for commercial use. In addition, the Non-Propulsive Energy demonstrator, HyPower, will use a fuel cell containing ten kilograms of gaseous hydrogen generated from renewable sources to produce electricity when tested on board an Airbus A330 in standard operating conditions. It aims to reduce the emissions of CO<sub>2</sub>, NO<sub>x</sub> and noise levels associated with a traditional APU.



### **RISE Open Fan**

SAFRAN is developing the CFM RISE Open Fan engine demonstrator combining lightweight equipment and advanced technologies such as hybrid electric systems. An open fan architecture has the potential to reduce fuel consumption and CO<sub>2</sub> emissions by more than 20% compared to today's most efficient engines. This advanced, new generation open fan architecture is expected to be able to fly at the same speed as current single-aisle aircraft (up to Mach 0.8) with a noise signature that will meet anticipated future regulations.



Flight testing of the RISE Open Fan is being done in collaboration with Airbus using their A380 Flight Test Demonstrator that aims to mature and accelerate the development of advanced propulsion technologies. The programme objectives include enhanced understanding of engine/wing integration and aerodynamic performance as well as propulsive system efficiency gains, evaluating acoustic models, and ensuring compatibility with 100% Sustainable Aviation Fuels.





## List of Resources

- [1] EU (2018), Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency.
- [2] ICAO (2023), Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume I, 8th Edition, Amendment 14 — Aircraft Noise.
- [3] ICAO (2023), Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume II, 5th Edition, Amendment 11 — Aircraft Engine Emissions.
- [4] ICAO (2023), Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume III, 1st Edition, Amendment 1 — Aeroplane CO<sub>2</sub> Emissions.
- [5] EASA (2025), EASA Aeroplane CO<sub>2</sub> Emissions Database.
- [6] ICAO (2025), ICAO Long Term Global Aspirational Goal (LTAG) for International Aviation.
- [7] EASA (2023), Environmental Protection Technical Specifications applicable to VTOL-capable aircraft powered by non-tilting rotors.
- [8] EASA (2024), Environmental Protection Technical Specifications applicable to VTOL-capable aircraft powered by tilting rotors.
- [9] EASA (2025), Environmental Footprint Aviation Study for Drones & eVTOLs.
- [10] AZEA (2025), Alliance for Zero Emission Aircraft.
- [11] AZEA (2023), Current aviation regulatory landscape for aircraft powered by hydrogen or electric propulsion.
- [12] EASA (2025), Innovation Services.
- [13] AZEA (2023), Current Standardisation Landscape.
- [14] AZEA (2024), Concept of Operation for the Introduction of Electric, Hybrid-electric and Hydrogen powered Zero Emission Aircraft.
- [15] AZEA (2024), Flying on electricity and hydrogen in Europe.
- [16] ATAG (2021), Waypoint 2050 Second Edition.
- [17] ICCT (2022), Environmental limits on supersonic aircraft in 2035.
- [18] EASA (2025), General Aviation Flightpath 2030+.
- [19] EU (2025), Horizon Europe.
- [20] EU (2025), HESTIA Horizon Europe project.
- [21] EU (2025), BeCoM Horizon Europe project.
- [22] EU (2025), EU Research Projects.
- [23] Clean Sky 2 (2014), Council Regulation (EU) No 558/2014 of 6 May 2014 establishing the Clean Sky 2 Joint Undertaking.
- [24] Clean Sky 2 (2024), Technology Evaluator.
- [25] Clean Aviation (2021), Council Regulation (EU) 2021/2085 establishing the Joint Undertakings under Horizon Europe.
- [26] Clean Aviation (2024), Strategic Research & Innovation Agenda.



## 2. SUSTAINABLE AVIATION FUELS

- ReFuelEU Aviation sets minimum supply mandate for Sustainable Aviation Fuels (SAF) in the EU, starting with 2% in 2025 and increasing to 70% in 2050.
- A sub-mandate for synthetic aviation fuels, starting at 0.7% in 2030 and increasing to 35% in 2050, underlines their significant potential for emissions reductions.
- All SAF supplied under the ReFuelEU Aviation mandate must comply with the sustainability and greenhouse gas emissions saving criteria as set out in the Renewable Energy Directive (RED) and the revised Gas Directive.
- The ICAO CAAF/3 conference agreed in 2023 on a global aspirational vision to reduce CO<sub>2</sub> emissions from international aviation by 5% in 2030 through the use of SAF, low-carbon aviation fuels and other aviation cleaner energies.
- As of 2024, SAF production represented only 0.53% of global jet fuel use. Significant expansion of production capacity is required to meet future mandates and goals.
- SAF must meet international standards to ensure the safety and performance of aviation fuel. Various types of SAF have been approved, with ongoing efforts to increase blending limits and support the use of 100% drop-in SAF by 2030.
- SAF have the potential to offer significant CO<sub>2</sub> and non-CO<sub>2</sub> emissions reductions on a lifecycle basis compared to conventional jet fuels, primarily achieved during the production process using sustainable feedstock. However, various factors such as land use changes can negatively impact the overall lifecycle emissions.
- The upscaling of SAF has generated concerns about potential fraudulent behaviour whereby products labelled as meeting RED sustainability requirements are not compliant.
- Various measures have been put in place to support the achievement of European and ICAO goals on SAF, including a European Clearing House, financial incentives, research programmes and international cooperation.
- SAF production capacity currently under construction could supply the 3.2 Mt of SAF required under ReFuelEU Aviation in 2030, but would be required to ramp up quickly thereafter.
- SAF prices are currently 3 to 10 times more expensive than conventional fuel although they are expected to reduce substantially as production technologies scale up.

## 2.1 SAF Developments

The last few years have seen significant developments in the European sustainable aviation fuels landscape. With the adoption of the ReFuelEU Aviation Regulation [1], European legislators are ensuring a level playing field for sustainable air transport by establishing minimum mandates for fuel suppliers starting in 2025, including sub-mandates for e-fuels. Together with a growing number of initiatives and mandates outside of Europe, the market is now at a pivotal point and an ambitious increase of production capacity will be required to meet this mandate.

## 2.2 What are Sustainable Aviation Fuels?

A Sustainable Aviation Fuel (SAF) is a sustainable, non-conventional, alternative to fossil-based jet fuel. Several definitions and terminology apply, depending on regulatory context, feedstock basis, and production technology.

According to the ReFuelEU Aviation Regulation, SAF are defined as various types of drop-in aviation fuels (Table 2.1). For instance, aviation biofuels mean biofuels as defined in the Renewable Energy Directive (RED) [2] and excluding fuels produced from food and feed crops as well as other feedstock specified in Article 4 of the Regulation. Finally, for synthetic aviation fuels, a variety of terminologies are used, such as liquid Renewable Fuels of Non-Biological Origin (RFNBO) in ReFuelEU Aviation, but also Electrofuels, e-Fuels and Power-to-Liquid (PtL).

Both ReFuelEU Aviation and the EU Emission Trading System (ETS) use the RED as their basis and all eligible fuels need to comply with the sustainability and greenhouse gas (GHG) emissions reduction criteria set out in the RED.

**Table 2.1** ReFuelEU Aviation aviation fuel categories

Type of ReFuelEU Aviation fuel	Definition in RFEUA Article	Comments
Categories of sustainable aviation fuels (SAF)		
<b>Synthetic aviation fuels</b>	Art 3(12)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001
<b>Advanced aviation biofuels</b>	Art 3(8)(a)	Produced from the feedstock listed in Part A Annex IX of Directive (EU) 2018/2001
<b>Aviation biofuels</b>	Art 3(8)(b)	Produced from feedstock listed in Part B Annex IX of Directive (EU) 2018/2001
<b>Other aviation biofuels</b>	Art 3(8)(c)	Produced from feedstock not listed in Annex IX of Directive (EU) 2018/2001 and except for those produced from food and feed crops



<b>Recycled carbon aviation fuels</b>	Art 3(9)	Produced from waste streams of non-renewable origin which are not suitable for material recovery
Categories of other eligible renewable and low-carbon aviation fuels under RFEUA		
<b>Low-carbon hydrogen for aviation</b>	Art 3(15)	Produced from non-fossil non-renewable sources
<b>Renewable hydrogen for aviation</b>	Art 3(16)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001
<b>Synthetic low-carbon aviation fuels</b>	Art 3(13)	Produced from non-fossil non-renewable sources
Other aviation fuels under RFEUA		
<b>Conventional aviation fuel</b>	Art 3(14)	Aviation fuels produced from fossil non-renewable sources of hydrocarbon fuels (e.g. crude oil)

### Standardisation process for qualification of new SAF production pathways

The reliable performance of aviation fuel is essential to the safe operation of aircraft and is a matter of airworthiness requiring harmonised international practices. What is commonly referred to as “aviation turbine fuel”, is a highly specified technical material, characterised by many chemical and physical properties defined by technical specifications, such as the ASTM D1655 and DEF STAN 91-091 [3, 4]. These specifications are developed and maintained by ASTM International and United Kingdom Ministry of Defence (UK MOD) respectively, with support from stakeholder groups such as Original Equipment Manufacturers (OEMs), fuel producers, fuel suppliers, airline operators and regulatory bodies. These fuel standards list the requirements for Jet A/Jet A-1, which is aviation turbine fuel for use within gas turbine engines.

Qualified production pathways are listed in ASTM D7566 [5], which sets out the standard specification for “aviation turbine fuel containing synthesized hydrocarbons”, meaning fuels that are of non-conventional origin. Each type of production pathway is defined in terms of feedstock, conversion technology, fuel specification properties, and maximum blending fraction. After fulfilling blending requirements in ASTM D7566 Table 1 the fuel is redeclared and treated as an ASTM D1655 Jet A/Jet A-1 fuel.

As of October 2024, eight SAF production processes have been standardized by ASTM and consequently been adopted by other fuel standards [5]. In addition, three pathways for the co-processing of renewable feedstocks in petroleum refineries are qualified [3] with a feedstock blending limit of up to 24% (see Table 6.2).

**Table 2.2** Drop-in SAF qualified production pathways

Production pathway	Feedstocks <sup>18</sup>	Certification name	Maximum SAF share
<b>Biomass Gasification + Fischer-Tropsch (Gas+FT)</b>	Energy crops, ligno-cellulosic biomass, solid waste	FT-SPK <sup>19</sup>	50%
<b>Hydroprocessed Esters and Fatty Acids (HEFA)</b>	Vegetable and animal fat	HEFA-SPK	50%
<b>Direct Sugars to Hydrocarbons (DSHC)</b>	Conventional sugars, lignocellulosic sugars	HFS-SIP <sup>20</sup>	10% <sup>21</sup>
<b>Biomass Gasification + FT with Aromatics</b>	Energy crops, ligno-cellulosic biomass, solid waste	FT-SPK/A <sup>22</sup>	50%
<b>Alcohol to Jet (AtJ)</b>	Sugar, starch crops, lignocellulosic biomass	ATJ-SPK	50%
<b>Catalytic Hydrothermolysis Jet (CHJ)</b>	Vegetable and animal fat	CHJ or CH-SK <sup>23</sup>	50%
<b>HEFA from algae</b>	Microalgae oils	HC-HEFA-SPK <sup>24</sup>	10%
<b>AtJ with Aromatics</b>	Sugar, starch crops, lignocellulosic biomass	ATJ-SKA	50%
<b>FOG Co-processing</b>	Fats, oils, and greases	FOG	5%
<b>FT Co-processing</b>	Fischer-Tropsch (FT) biocrude	FT	5%
<b>Hydroprocessed Lipids Co-processing</b>	Hydroprocessed vegetable oils, animal fats, used cooking oils	Hydroprocessed Lipids Co-processing	10%

<sup>18</sup> The listed feedstocks are technologically feasible for the specific production pathway, but not necessarily applicable under certain regulations (e.g. ReFuelEU Aviation).

<sup>19</sup> FT-SPK: Fischer-Tropsch synthesised paraffinic kerosene.

<sup>20</sup> HFS-SIP: hydroprocessed fermented sugars to synthetic iso-paraffins.

<sup>21</sup> TRL 7-8 for conventional sugar feedstock; TRL 5 for lignocellulosic sugar feedstock.

<sup>22</sup> FT-SPK/A: Fischer-Tropsch synthesised paraffinic kerosene with Aromatics.

<sup>23</sup> CH-SK: catalytic hydrothermolysis synthesised kerosene.

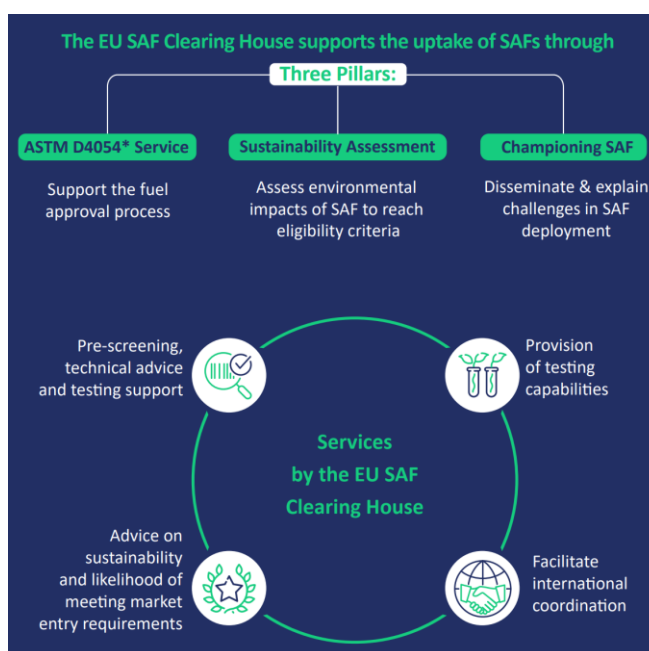
<sup>24</sup> HC-HEFA-SPK: Synthesised paraffinic kerosene from hydrocarbon-hydroprocessed esters and fatty acids.

In order to be included in ASTM D7566, novel SAF production pathways need to go through a thorough qualification process specified in ASTM D4054 [6]. This process includes the testing of fuel samples, ranging from small-scale laboratory tests with a limited amount of fuel to full rig- and engine-testing that requires thousands of litres. The resulting research reports are then reviewed and approved by the OEMs before being proposed as ballot for inclusion of a new Annex to ASTM D7566. This is both expensive and time-consuming for all involved stakeholders, which has led to the setup of several SAF Clearing Houses to support this process (see Textbox).

### EU SAF Clearing House

The EU SAF Clearing House [7], which is funded by the EU and managed by EASA, is a 'one stop' knowledge centre providing all the information, data and stakeholder connections needed by fuel producers seeking to advance through the ASTM qualification process described above and contribute to the production and supply of sustainable aviation fuels.

Each of the approved SAFs within the ASTM D7566 Annexes has its own characteristics and is tapping into certain categories of feedstock. To be able to produce enough SAF to meet the future needs of the aviation sector, more pathways that tap into new feedstock that have good sustainability characteristics and are economically viable, are required.



There is substantial work being done within fuel standard committees to increase the blending limits for both SAF and the co-processing of renewable feedstock in conventional refineries. For the latter, there are ambitions to increase the limit to 30% by 2025 as the existing infrastructure can be immediately deployed to increase the sustainable share in aviation fuels and support fulfilling the mandates without requiring major investments. The research work required to remove the blending limit and enable the use of 100% SAF is ongoing (see textbox).

### Two Options for 100% SAF: Drop-in and Non-Drop-in

Approved SAF currently have associated maximum blending ratios (Table 2.2) that may limit the ability to use larger amounts of SAF in the future. As such, dedicated task groups within fuel standard committees are assessing two options to facilitate the use of 100% SAF in aircraft with an initial timeline of having fuel standards ready by latest 2030:

- a. 100% Drop-In SAF: Jet Fuel Fully Comprised of Synthesized Hydrocarbon as a drop-in replacement which is identical to Jet A/Jet A-1

- b. 100% Non-Drop-In SAF: Non-Drop-In Fully Synthetic Aviation Jet Fuel is aromatic free fuel, which is close to Jet A/Jet A-1 but would be a different fuel.

The 100% Drop-In SAF will be a modification to the existing ASTM D7566. One option to realize such a fuel is to blend two or more SAFs to produce a fuel with characteristics that are fit for purpose in terms of 100% use. Another option is the adaptation of currently used raw materials and production processes to produce a fully formulated 100% SAF in a single process stream (e.g. AtJ, FT-SPK/A and CHJ) or the use of new raw materials and processes yet to be developed and approved. In the last two years, the successful use of 100% Drop-In SAF was demonstrated in experimental flights by different commercial airlines in tight cooperation with OEMs and airworthiness authorities.

The 100% Non-Drop-In SAF would be a new fuel standard specification. It could be used in designated aircraft/engines only and would require a separate supply chain. A major motivation for this new fuel type would be to significantly reduce emissions that contribute to non-CO<sub>2</sub> climate impacts and local air quality. For (non-aromatic) 100% Non-Drop-In SAFs a series of research and test flights proved their positive effects on emissions and contrail formation. Furthermore, valuable data was collected that will support the specification of a 100% Non-Drop-In SAF.

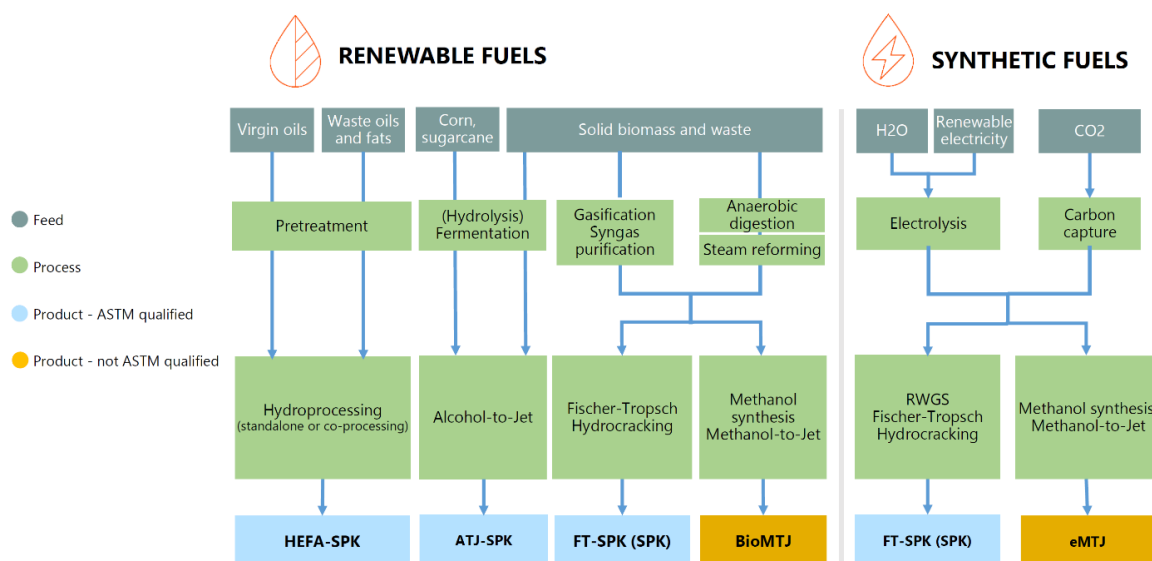
A collaborative effort across the aviation ecosystem aims to maximize global impact, with standardization and technical readiness currently in progress. Ongoing impact analysis focuses on fuel production, while further studies are necessary to address infrastructure challenges associated with 100% Non-Drop-In SAF.

With a variety of feedstock categories that can be used to produce SAF, the production can be tailored to the specific circumstances of a country and thereby support diversification of fuel supplies. Four of the production pathways that are expected to play a major role in the future are Hydroprocessed Esters and Fatty Acids (HEFA) (TRL<sup>25</sup> 8-9), Alcohols to Jet (AtJ) (TRL 7-8), Biomass Gasification with Fischer-Tropsch (Gas+FT)

(TRL 6-8) and Power-to-Liquid (PtL) (TRL 5-8). New production pathways and suitable feedstocks are being developed. Methanol-to-Jet is one promising technology that is being worked on by several companies and is currently going through the qualification process. The advantage of this pathway is that it can be used both with biomass feedstock as well as a conversion technology for Power-to-Liquid fuels.

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<sup>25</sup> Technology Readiness Level.

**Figure 2.1 Main SAF production pathways with similar building blocks [8]**

**Hydroprocessed Esters and Fatty Acids (HEFA).** Currently the most viable option to produce SAF due to its commercial and technical maturity. Feedstocks include waste and residue fats, such as vegetable oil, used cooking oil, and animal fats, as well as purpose-grown crops like jatropha and camelina. These feedstocks are processed with hydrogen to remove oxygen and create hydrocarbon fuel components. However, supply will be limited by the availability of sustainable feedstock and competition from other sectors, such as road. In addition, with growing demand there is a risk of potential fraud from the use of feedstock that does not comply with the sustainability criteria (see Textbox on Sustainable Certification Schemes).

**Alcohols to Jet (AtJ) and Biomass Gasification with Fischer-Tropsch (Gas+FT).** AtJ fuels can be produced from agricultural residues and crops and the renewable fraction of municipal waste via an alcohol synthesis. Gas+FT converts biogas or syngas from similar feedstocks into fuel. Both methods can be produced with or without aromatics. Aromatics are essential for the performance of certain aircraft engine components (e.g. seals) but have environmental drawbacks in terms of particulate matter emissions. On the other hand, the production with aromatics would enable future 100% drop-in SAF production (see textbox) once the two pathways develop and are commercially available in the EU for aviation fuel production.

**Power-to-Liquid (PtL).** These fuels offer one of the highest potentials to scale-up production capacity in the future. While not being limited by sustainable biomass availability, they are reliant on access to sufficient additional renewable energy electricity, and an energy efficient conversion process, to achieve significant CO<sub>2</sub> emission reductions. Water and electricity are used in an electrolyser to generate hydrogen, which is then combined with CO<sub>2</sub> to create syngas. This syngas can then be further converted to SAF via the Fischer-Tropsch (FT) pathway or the Methanol-to-Jet pathway (currently in the ASTM D4054 qualification process). The CO<sub>2</sub> required for the PtL process can be obtained from industrial waste gases, biomass, or direct air capture (DAC). With DAC, the CO<sub>2</sub> is directly captured from the air through filters. As the concentration of CO<sub>2</sub> in the air is low, this process is very energy

intensive but offers high CO<sub>2</sub> emission reduction potential, once the technology has further matured.

## 2.3 How sustainable are SAF?

### Sustainability criteria

Table 2.3 provides an overview of the sustainability criteria used within both the RED [2] and the ICAO Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) [9].

**Table 2.3** SAF sustainability criteria

Scheme	Sustainability criteria
Renewable Energy Directive (2023), Article 29	<ul style="list-style-type: none"> <li>• <i>GHG reductions</i> – GHG emissions on a life cycle basis from biofuels must be lower than from the fossil fuel they replace (fossil fuel baseline = 94 g CO<sub>2</sub>e/MJ): at least 50% lower for installations older than 5 October 2015, 60% lower for installations after that date and 65% lower for biofuels produced in installations starting operation after 2021. For renewable fuels from non-biological origin, and recycled carbon fuels, the savings shall be at least 70%.</li> <li>• <i>Land use change</i> – Carbon stock and biodiversity: raw materials for biofuels production cannot be sourced from land with high biodiversity or high carbon stock (i.e., primary and protected forests, highly biodiverse grassland, wetlands and peatlands). Other sustainability issues covered by the reporting obligation are set out in the Governance regulation [10] and can be covered by certification schemes on a voluntary basis. There are also constraints on forest management.</li> <li>• There are additional criteria that are applicable and ensure that electricity used for the production of renewable hydrogen and RFNBOs is of renewable and additional origin.</li> <li>• There are also limitations on biomass production from feedstocks with high indirect land use change (ILUC) risk and using feedstock that could otherwise be used for food, in order to prevent inappropriate land usage and risk to food security.</li> </ul>
CORSIA Sustainability Criteria for CORSIA eligible fuels (November 2022)	<p>For batches produced on or after 1 January 2024, the following Sustainability Criteria are applicable:</p> <ul style="list-style-type: none"> <li>• <i>GHG reductions</i> – CORSIA eligible fuel / SAF must achieve net GHG emissions reductions of at least 10% compared to the baseline life-cycle emissions values for aviation fuel on a life cycle basis (fossil fuel baseline = 89 g CO<sub>2</sub>e/MJ), including</li> </ul>

an estimation of ILUC and/or DLUC emissions.

- *Carbon Stock* - CORSIA eligible fuel / SAF will not be made from biomass obtained from land converted after 1 January 2008 that was primary forest, wetlands, or peat lands and/or contributes to degradation of the carbon stock in primary forests, wetlands, or peat lands as these lands all have high carbon stocks.

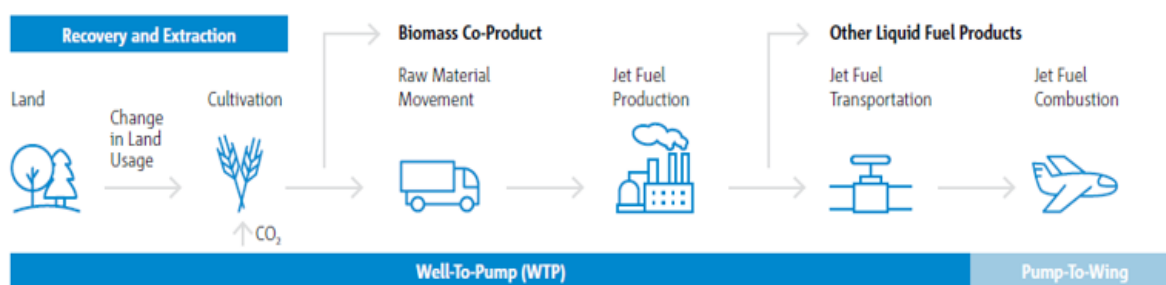
- *Permanence* – The emissions reductions attributed to CORSIA SAF should be permanent. Practices will be implemented that monitor, mitigate and compensate any material incidence of non-permanence resulting from carbon capture and sequestration (CCS) activities.

There are additional criteria that are applicable and are addressing the following themes: Water, Soil, Air, Conservation (biodiversity), Waste and chemicals, Human and labour rights, Seismic and Vibrational Impacts, Human and labour rights, Land use rights and land use, Water use rights, Local and social development and Food security.

## GHG emissions reductions

The emissions reductions from drop-in SAF in a lifecycle analysis (LCA) are predominately achieved during the production process and more precisely through the use of sustainable feedstock. The greenhouse gases (GHG) emissions in terms of gCO<sub>2</sub>e/MJ from its combustion in an aircraft engine are effectively the same as that those of fossil fuels. Many variables can influence the overall results of the LCA (Figure 2.2), but given historic concerns surrounding biofuel sustainability, it is encouraged to calculate actual life cycle emission values rather than applying a default value.

**Figure 2.2** Components of typical well-to-wing LCA for biofuel-based jet fuel



Overestimations of GHG emissions reductions can occur if potential land use changes are not properly considered. Direct Land Use Changes (DLUC) occur when existing land is converted for the growth of feedstock for biofuel, while Indirect Land Use Change (ILUC) occurs when agricultural land used for food or feed is converted to biofuel production and the displaced production shifts to previously non-agricultural land, such as forests or grasslands [11]. Land use change, both direct and indirectly caused by crop displacements, can potentially negate any GHG savings from biofuels, or even release more CO<sub>2</sub>-equivalent emissions



than what the biomass subsequently grown on that land is able to reduce. Wastes and residues are conventionally considered as having zero DLUC or ILUC associated emissions.

The update to the RED in 2023 has tightened the rules around land use, emphasizing the protection of biodiverse areas and placing stricter controls on land conversion, and imposing restrictions on feedstocks with the higher ILUC risk. Bioenergy production is restricted on lands with high biodiversity value, such as primary forests, highly biodiverse grasslands, and areas designated for nature protection purposes. ReFuelEU Aviation is more stringent than RED by excluding feed and food crops, palm and soy-derived materials, palm fatty acid distillate (PFAD), soap stock and its derivatives as eligible.

Figure 2.3 provides an overview of modelled emissions under CORSIA for approved SAF production pathways as of March 2024, separated into Core LCA and ILUC values. Work is ongoing to approve the methodology for calculating the GHG emissions reductions for Power-to-Liquid fuels, where the main lever for emission reductions is the source of electricity to obtain the hydrogen and the source of carbon, which are both required for PtL fuels.

### SAF and non-CO<sub>2</sub> emissions

Aviation non-CO<sub>2</sub> emissions refer to pollutants other than carbon dioxide (CO<sub>2</sub>) that have a climate impact, including nitrogen oxides (NO<sub>x</sub>), aerosol particles (soot and sulphur-based) and water vapour. Some types of SAF have the potential to offer significant non-CO<sub>2</sub> emissions reductions [12, 13].

While it is recognised that aviation non-CO<sub>2</sub> emissions contribute to the overall climate impact, these non-CO<sub>2</sub> effects are currently only estimated with low confidence and substantial uncertainties. The revised EU ETS Directive requires aircraft operators to monitor and report once a year on the non-CO<sub>2</sub> aviation effects.

Research projects, such as AVIATOR and RAPTOR [14, 15] have shown that the use of certain types of SAF could have positive impacts on local air quality [16] due to lower levels of sulphur and aromatic content which contribute to volatile and non-volatile particulate matter (nvPM) emissions. Evidence of contrail reduction when using SAF has been collected and scientifically acknowledged since 2015 (ECLIF I) and further substantiated in the ECLIF II and ND-MAX projects (2018) [17].

In-flight measurements between 2021 and 2024 during the European ECLIF III and VOLCAN I and II research projects extended the studies by using 100% Drop-In and 100 % Non-Drop-In SAF in both modern rich-burn and learn-burn combustors. These tests demonstrated a significant contrail reduction due to lower nvPM emissions and ice crystal formations, thereby indicating positive effects on climate change mitigation through the use of SAF [18].





**Figure 2.3 LCA emissions for CORSIA eligible SAF pathways and feedstock compared to CORSIA fossil fuel reference value (89 g CO<sub>2</sub>e/MJ) [19]<sup>26</sup>**



### Sustainability Certification Schemes – Combatting fraudulent practices.

With so much emphasis being placed on SAF to help reduce aviation emissions, the 'S' in SAF needs to live up to its promise and ensure the effective delivery of emission reductions while avoiding unintended negative environmental and social impacts of its production, thus contributing to the credibility of the sector.

<sup>26</sup> Two different ATJ conversion plant layouts can be considered. The integrated plant layout assumes co-locating the ATJ process with ethanol production and emissions reductions as a result of heat integration. The standalone configuration assumes that ethanol is taken from the market or a separate ethanol production facility.

Major regulatory frameworks, such as the EU RED and CORSIA, therefore make use of Sustainability Certification Schemes (SCS). The objective of SCS is to ensure that SAF meet the required sustainability criteria by controlling the compliance with the sustainability requirements along the SAF value chain on a lifecycle basis. Audits are performed by ISO-accredited third-party certification bodies along the complete value chain, from raw material extraction to delivery of SAF to its point of use. In these audits, the auditor focuses on checking each economic operator's compliance with a defined set of sustainability criteria as well as traceability (Chain of Custody) and life cycle emissions criteria, thus ensuring that SAF is produced in accordance with the relevant regulatory requirements (e.g. as per the EU RED or CORSIA).

In recent years, SAF and biofuels upscaling has generated growing concerns about the fraudulent trading of non-sustainable feedstock or biofuels in the EU [20, 21]. Fraudulent behaviour may ensue whereby products are labelled as meeting sustainability requirements even when they are non-compliant. This is highly problematic insofar as these practices threaten both the effectiveness and credibility of climate and renewable energy policies.

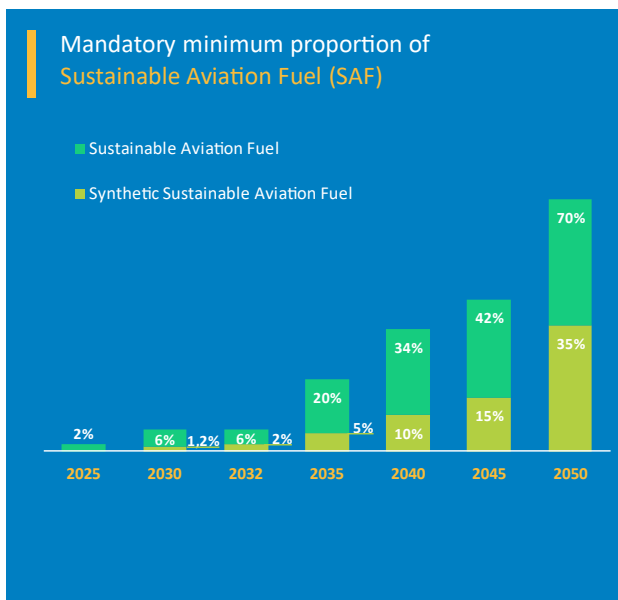
NGOs and European biofuel producers have repeatedly warned against dubious imports and raised concerns about the effectiveness of the certification schemes, which in part led to the development of the EU Union Database that will increase the transparency and reliability of the tracking system of renewable fuels along their supply chains. The Union Database is appropriately integrated in the reporting process of SAF supplied to EU airports under the ReFuelEU Aviation Regulation and the EU ETS Directive.

In response to these concerns, certification schemes have generally increased their efforts to enhance the credibility of the system, including unannounced integrity audits at randomly selected plants and economic operators. As a result, some sustainability certificates were withdrawn or temporarily suspended. They have also put in place a transaction database that is linked with the EU Union Database to prevent the relabelling of sustainability declarations, a mapping tool to support risk identification for auditors, specific guidance materials for waste and residue materials and evaluations of the technical feasibility of processing plants to deal with low-grade advanced waste/residue material [22].

## 2.4 SAF Policy Actions

### ReFuelEU Aviation

The ReFuelEU Aviation Regulation sets out EU-level harmonised obligations on aviation fuel



suppliers, aircraft operators and Union airports for scaling up SAF used for flights departing from all EU airports above a certain annual traffic thresholds (passenger traffic above 800,000 or freight traffic above 100,000 tons). Starting in 2025, aviation fuel suppliers are required to supply a minimum of 2% blend of SAF with conventional fossil-based fuels to Union airports and this gradually increases to at least 70% by 2050. Synthetic aviation fuels are subject to an ambitious sub-mandate, starting with 1.2% in 2030, 2% in 2032 and reaching 35% in 2050 [1]. Aircraft operators departing from EU airports must also refuel with the aviation fuel necessary to operate the flight. This avoids the excessive emissions related to extra weight and minimises the risks of carbon leakage caused by so-called 'economic tankering' practices.

Between 2025 and 2034, aviation fuel suppliers can supply the minimum shares of SAF as an average over all the aviation fuel they have supplied across Union airports for that reporting period. This flexibility mechanism allows the industry to develop the production and supply capacity accordingly and the fuel suppliers to meet their obligations in the most cost-effective way without reducing the overall ambition. The Commission's Report will identify and assess the developments on SAF production and supply on the Union aviation fuel market, as well as assess possible improvements or additional measures to the existing flexibility mechanism, such as setting a potential accounting and trading mechanism for SAF (a so-called 'book and claim' system). [27]

In order to support the achievement of the ReFuelEU Aviation supply mandate, the EU has put in place various regulatory, financial and other supporting measures, including:

- A zero emissions rating of RED-compliant SAF used under the EU Emissions Trading System (ETS);
- A maximum of 20 million extra ETS (with an estimated value of €1.6 billion) allowances will be allocated to aircraft operators during 2024 to 2030 for the uplifting of SAF to also cover part of, or all of the price difference with fossil kerosene, depending on the type of SAF and the uplift location;
- A fuel tax structure under the proposed revision of Energy Taxation Directive that would incentivise SAF over fossil kerosene through preferential tax rates;
- A flight emissions label laying down harmonized rules for the estimation of airline emissions taking into account SAF uptake;

- The inclusion in the EU Taxonomy of SAF production and uptake to improve access to green finance;
- R&D and deployment financing support under Horizon Europe, Innovation Fund, InvestEU programmes to de-risk SAF production at all technology maturity stages;
- The accelerated qualification of new SAF technologies and approval of new production plants through creation of EU SAF Clearing House and inclusion of SAF in the Net Zero Industry Act proposal;
- Cross-sectoral cooperation in the Renewable and Low-Carbon Fuels Value Chain Industrial Alliance (RLCF Alliance). The RLCF Alliance, as the industrial pillar of ReFuelEU Aviation to support SAF supply, and emergence of SAF projects and match-making with potential fuel offtakers, is open to all stakeholders.
- EU-funded international cooperation SAF projects with partner States in Africa, Asia, Latin America and the Caribbean. This includes a €4 million ACT-SAF project to conduct feasibility studies and capacity building activities.
- Designation of SAF as a 2024 Global Gateway Flagship initiative, supporting the development, production and use of SAF by de-risking SAF investments outside Europe via different types of funding.
- International cooperation at ICAO level, including the EU's role in the negotiations to reach an agreement at CAAF/3 in November 2023.

#### **ICAO Conference on Aviation Alternative Fuels (CAAF/3)**

The third ICAO Conference on Aviation Alternative Fuels (CAAF/3) was held in November 2023, during which ICAO Member States agreed on the ICAO Global Framework for SAF, Lower Carbon Aviation Fuels (LCAF) and other Aviation Cleaner Energies. This includes a collective global aspirational vision to reduce CO<sub>2</sub> emissions from international aviation by 5% in 2030

with the increased production of SAF, LCAF and other initiatives [23]. Building blocks in terms of policy and planning, regulatory framework, implementation support and financing will be key in achieving this goal. The vision will be continually monitored and periodically reviewed, including through the convening of CAAF/4 no later than 2028, with a view to updating the ambition on the basis of market developments in all regions.



The ReFuelEU Aviation Regulation also foresees a thorough monitoring and reporting system of SAF supply and usage that will provide an overview of the European SAF market and form part of future editions of this report. This reporting is linked with an enforcement mechanism consisting of penalties imposed by Member States for the cases of non-compliance from fuel suppliers and aircraft operators.

First in 2027 and every four years thereafter, the European Commission will present a detailed assessment of the SAF market and the possible need to revise the scope of the Regulation, the eligible fuels, the minimum shares and the level of fines for non-compliance. It will also include an assessment of possible support mechanisms for production and uptake of SAF.

### **ECAC States policy actions**

Switzerland set out a SAF strategy with the goal that SAF shall contribute a minimum of 60% to net CO<sub>2</sub> reductions in Swiss civil aviation by 2050, contributing to the Swiss goal of reaching net-zero CO<sub>2</sub> emissions in 2050. It is accompanied by a legislative proposal that includes a blending mandate and provision of funding for the development of SAF production pathways, planned to enter into force in 2025. To avoid market distortion, the mandate shall be aligned with ReFuelEU Aviation. Turkey is also planning to develop dedicated SAF regulations to incentivize its uptake [24]. The United Kingdom SAF policy includes a SAF Mandate to drive an ambitious ramp-up of SAF in the aviation fuel supply, starting with 2% in 2025, increasing linearly to 10% in 2030 and reaching 22% in 2040. The Mandate includes a cap on the amount of HEFA SAF used to meet obligations, and there is a separate obligation for power-to-liquid fuels, starting in 2028 with 0.2% of the total fuel supply and reaching 3.5% in 2040. [25].

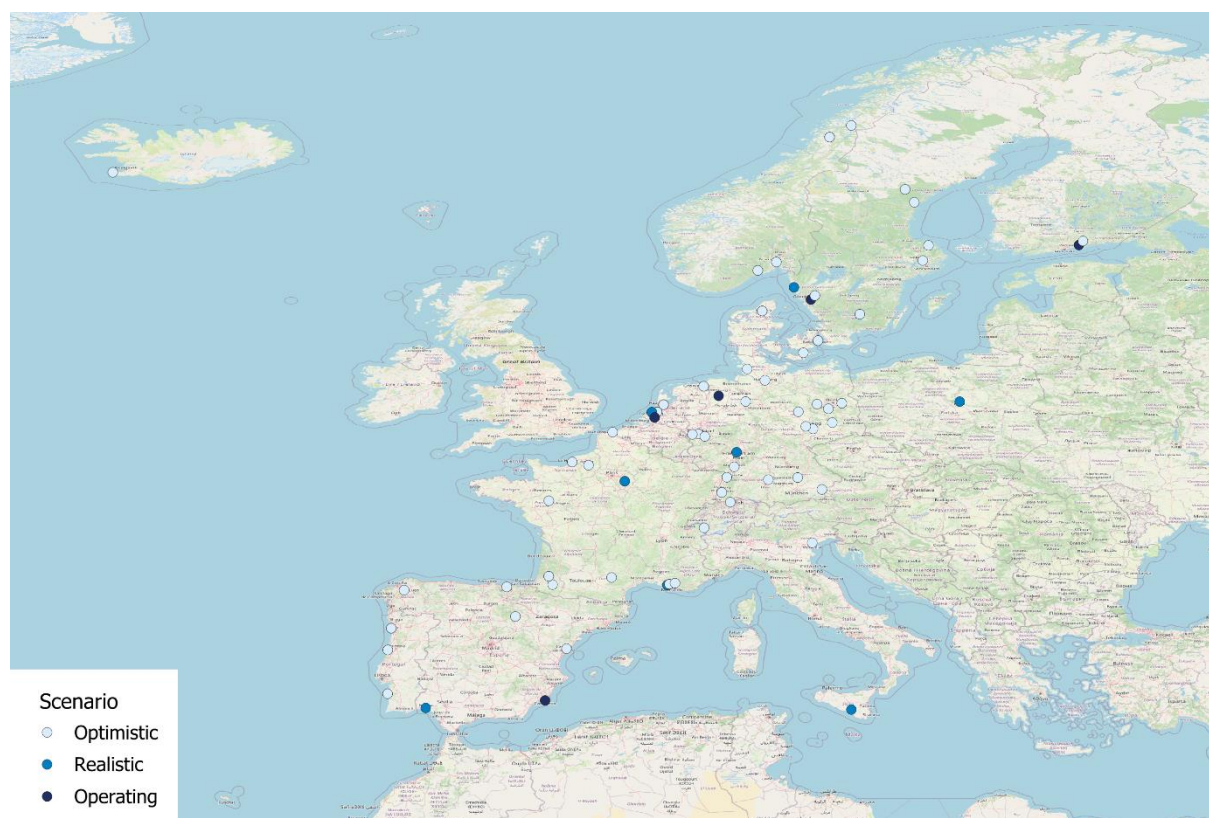
## **2.5 SAF Market**

Global SAF production represented only 0.53% of jet fuel use in 2024, up from 0.2% in 2023 [26, 27, 28]. The EU SAF market, incentivized following the adoption of the ReFuelEU Aviation Regulation and the revision of the EU ETS and the RED, is now in a transition phase. The regulation requires a significant expansion of the production capacity in order to avoid the EU market becoming overly reliant on imports. Starting in 2025, fuel suppliers are mandated to supply a growing amount of SAF to Union airports. EASA is tasked with monitoring and reporting under the regulation and will produce annual reports, which will include a status of the evolving SAF market.

### **Current and future SAF production capacity**

According to information collated with the support of ReFuelEU Aviation Member State Network (Figure 2.5), established by EASA to support the implementation of the Regulation, the current annual SAF production capacity in the EU is just above 1 million tonnes (Mt). Almost all this SAF production is HEFA and does not account for co-processing production using sustainable feedstock in fossil fuel plants, for which there is not enough reliable information. This could be considered to be an 'operating scenario'.

**Figure 2.5 Projected** EU SAF facilities in 2030 under the Optimistic scenario

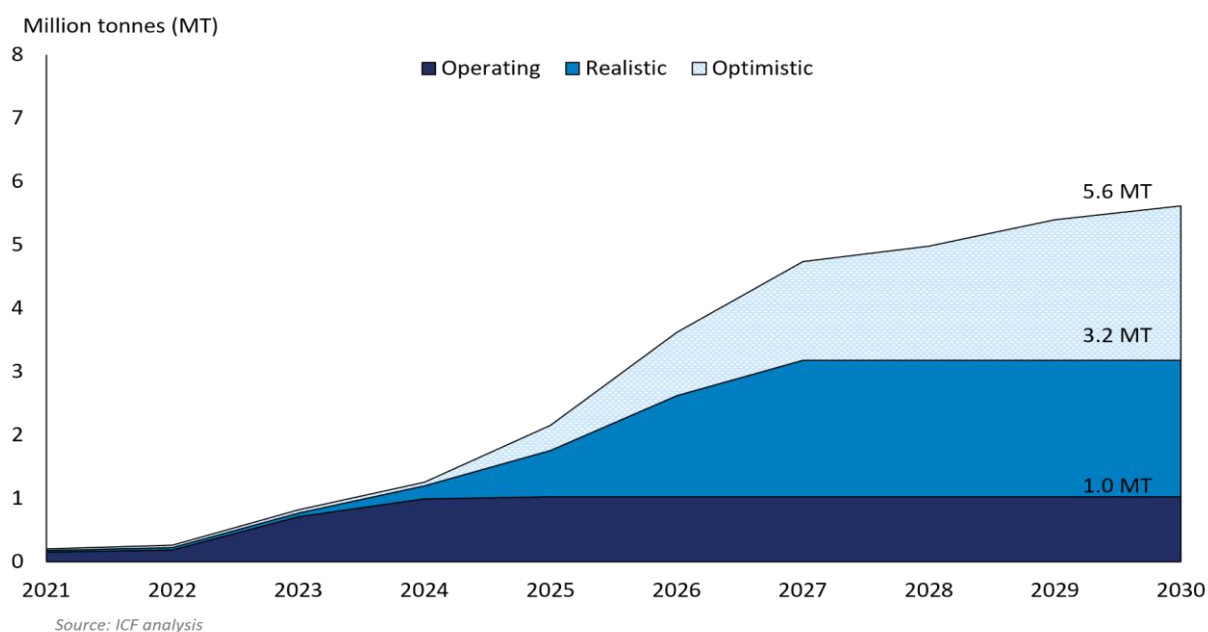


If facilities that are currently under construction are taken into account, the amount of SAF production capacity in 2030 could reach 3.5 Mt. This could be considered a 'realistic scenario'. Again, almost all this production would be dominated by the HEFA production pathway and does not include any Power-to-Liquid (PtL) production, as no plant has yet evolved beyond a pilot stage. Other studies come to different conclusions, mostly due to a different set of assumptions and methodologies. The recent SkyNRG Market Outlook from June 2024 [29] estimates 3.8 Mt by 2030, including 0.3 Mt of PtL as well as some co-processing production, while IEA predicts roughly 3.8 Mt by 2038 [30]. In both cases, a significant acceleration in the construction of PtL plants will be needed to meet the first sub-mandate of 0.7% in 2030.

In addition to the operating and realistic scenarios, both the ReFuelEU Aviation Member State Network and the SkyNRG Market Outlook collected information to build up an 'optimistic scenario'. This includes all projects in the pipeline to be in operation by 2030 and includes PtL projects, leading to a projected SAF capacity of 5.9 Mt and 5.5 Mt respectively.

Figure 2.6 illustrates all of the above scenarios out to 2030. While the realistic scenario (3.5 Mt) would be able to meet the projected demand of the 6% mandate by 2030 (2.8 Mt), significant growth in production capacity is required to fulfil the very ambitious ramp-up to 20% in the subsequent 2030-2035 period.



**Figure 2.6** Projected EU SAF capacity in 2030 by scenario

Beyond 2030, projections of production capacity are more challenging and the potential SAF production will depend on the availability of feedstocks (e.g. HEFA, green hydrogen, renewable energy). The aviation industry will be competing with other sectors as part of the economy wide decarbonization efforts where these feedstocks could be used to directly decarbonize the primary energy supply. As a result, securing these sources of renewable energy will be critical to ensure the ramp-up of PtL SAF production within Europe. There are positive signals in particular from the solar industry, where the growth of global installation capacity is accelerating faster than anticipated and becoming the largest source of new electricity, with solar capacity doubling every three years and hence growing ten-fold every decade [31]. Overall, renewable energy passed 30% of the total global energy supply for the first time in 2023 [32]. By the 2030s, solar energy is likely to become the biggest source of electrical power and by the 2040s it may be the largest source of all energy [31].

Another limiting factor for SAF deployment towards 2050 is the capital expenditure required to build the production facilities. It is estimated that between 500-800 SAF facilities<sup>27</sup> will be needed globally by 2050, which, assuming €1.8 billion per facility, would result in around €36 billion capital expenditure annually between 2025 and 2050 [29].

Estimations of the future SAF landscape have concluded that indeed PtL fuels have the potential to cover 50% of the global SAF production capacity by 2050. Whereas HEFA production will be around 7% and AtJ / FT the remaining 43%. Projections by region also highlight the varying availabilities for feedstocks in the different parts of the world [33].

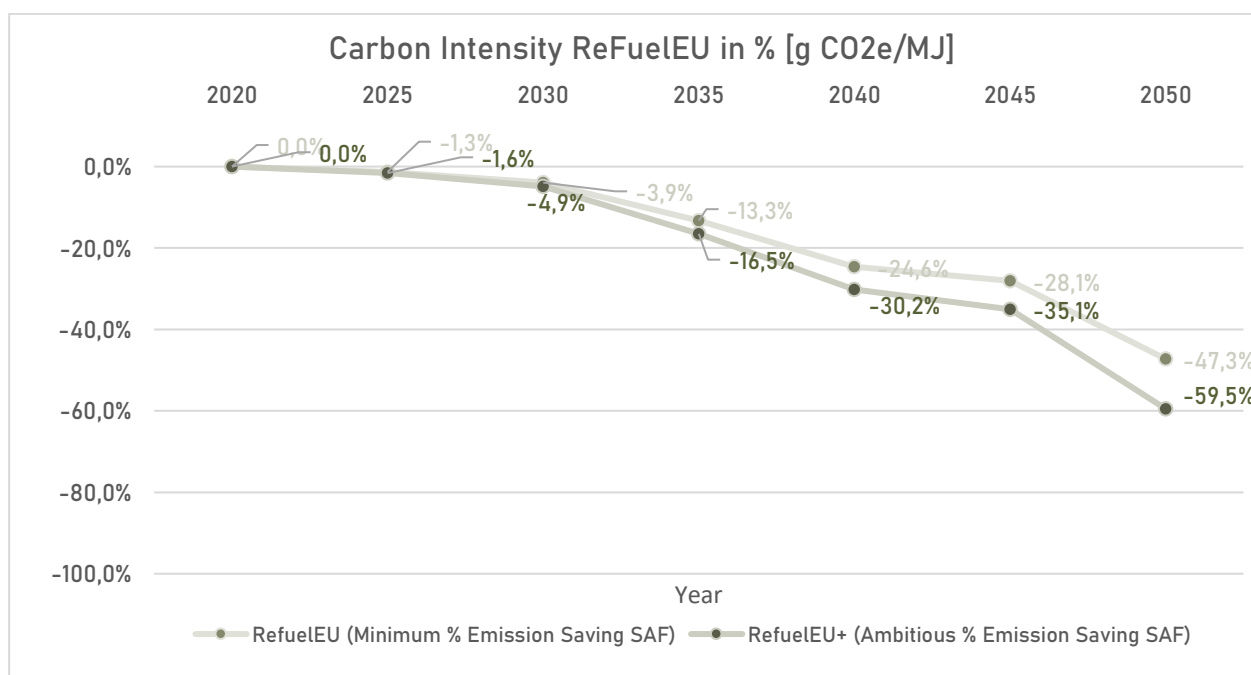
<sup>27</sup> Assuming 0.3 – 0.5 Mt average SAF output per year per facility.

## CO<sub>2</sub> emissions reductions

To estimate the potential CO<sub>2</sub> emission savings from the ReFuelEU Aviation Regulation, a comparison has been made between the carbon intensity reduction of global aviation fuel taking into account the SAF supplied and the EU RED fossil fuel baseline intensity of 94 gCO<sub>2</sub>e/MJ.

Two scenarios were assessed, a 'minimum' emissions saving and a more 'ambitious' scenario. The scenarios differ in the assumed emission reductions achieved by the (advanced) biofuels mandate and the RFNBO (PtL) fuel sub-mandate. The minimum scenario assumes a 65% and 70% emission reduction for biofuels and RFNBOs over their lifecycle respectively, which aligns with the minimum requirements set out in the ReFuelEU Aviation Regulation [1]. The second, more ambitious scenario assumes 80% and 90% emission reductions respectively for the two SAF types.

**Figure 2.8 % CO<sub>2</sub>eq emissions reductions from the uptake of SAF under ReFuelEU Aviation scenarios**



## SAF Price

The price of SAF is one of the most critical factors when it comes to its uptake, as fuel costs currently represent a large share of the operational cost of aircraft operators (approx. 30%). In 2023, the price of conventional jet fuel averaged around €816 per tonne and is a figure that is readily available from Price Reporting Agencies (PRA) indexes [34].<sup>28, 29</sup> When assessing the prices for ReFuelEU Aviation eligible SAF, a differentiation was made with SAF

<sup>28</sup> Price Reporting Agencies (PRA) used as data source: S&P Global Commodity Insights (Platts), Argus Media and General Index.

<sup>29</sup> With the density of kerosene of around 0.8 g/cm<sup>3</sup>, this results in a price of around 1.02€/l.

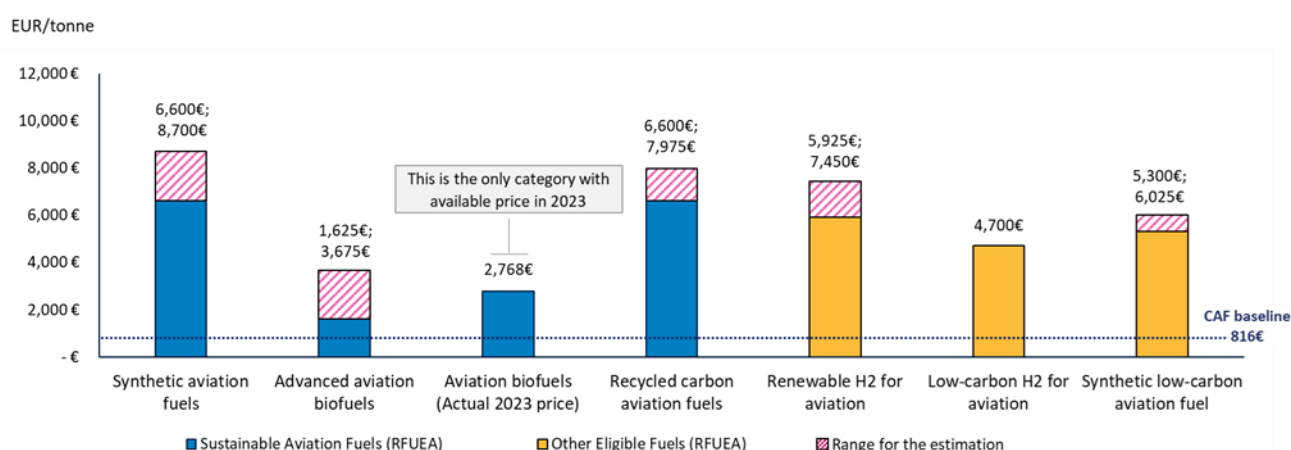


that are currently available on the market, and SAF for which only production cost estimations can be performed due to the market not being mature enough yet. For the former, only aviation biofuels that are produced from feedstock listed in Part B Annex IX of the Renewable Energy Directive have a market availability in 2023. The average price for these SAF was around €2768 per tonne in 2023, using as a reference the relevant indexes from the PRAs.

For fuels that had no market availability in 2023, production cost estimations were developed based on feedstock, energy and technology deployment costs resulting in prices that range from €1600 per tonne for advanced aviation biofuels to €8700 per tonne for PtL fuels. Figure 6.9 illustrates the estimated price ranges for the different eligible fuels under ReFuelEU Aviation in 2023. These production costs are expected to reduce substantially as emerging SAF and hydrogen production technologies scale up, and associated costs reduce.

Especially for PtL fuels, for which the energy price is a key cost driver, the differences in energy prices across Europe may play a role in where the production is most attractive and competitive for such fuels in the future [35, 36].

**Figure 2.9** Estimated prices and production costs in 2023 for ReFuelEU Aviation eligible fuels



## STAKEHOLDER ACTIONS

### Central Europe Pipeline System: First delivery of SAF

The Central Europe Pipeline System (CEPS) [37] is the largest fuel supply system in NATO and crosses Belgium, France, Germany, Luxemburg and the Netherlands and comprises of approx. 5,300 km of pipeline. It delivers jet fuel to major civil airports such as Frankfurt, Brussels, Luxembourg, Zurich and Schiphol (Amsterdam). Following the permission of NATO, the connected airports have been able to receive SAF blends through CEPS since 2023.

Neste cooperated with Brussels Airlines to deliver sustainable aviation fuel to the airline at Brussels Airport on January 1, 2023. This marked the first time that SAF was supplied to an airline at a European airport using the NATO CEPS. It showcases how existing fuel infrastructure can be used to supply SAF to airports.



### Delivering CORSIA certified SAF to airlines [38]

In July 2022, Neste delivered the first ever CORSIA certified batch of SAF (Neste MY Sustainable Aviation Fuel™) to American Airlines at San Francisco International Airport in July 2022. This was part of a pilot to certify SAF as a CORSIA Eligible Fuel that can be used by an airline to meet its emissions obligation under the Carbon Offsetting and Reduction Scheme for International Aviation ('CORSIA'), which is a market-based measure to lower CO<sub>2</sub> emissions for international flights and reduce aviation's contribution to climate change.

### First flight in history with 100% sustainable aviation fuel on a regional commercial aircraft [39]

Regional aircraft manufacturer ATR, Swedish airline Braathens Regional Airlines and Neste have collaborated to enable the first ever 100% SAF-powered test flight on a commercial regional aircraft.

The flight took place in Sweden in July 2022 and is part of the 100% SAF certification process of ATR aircraft that started in September 2021.



### Bringing together airlines and corporates [40]

Project Runway is an initiative launched by SkyNRG in June 2024 and brings together airlines and corporates to provide easy access to SAF. The project will support airlines in navigating the complexities of SAF procurement and provide an effective way to reduce their greenhouse gas emissions. Project Runway facilitates airlines access to SAF and allows them to share the SAF price premium with ambitious corporates aiming to reduce their own Scope 3 aviation emissions.

### Modular Power-to-X plants [41]

The modular chemical plants for power-to-X and gas-to-liquid applications developed by INERATEC use hydrogen from renewable electricity and greenhouse gases such as CO<sub>2</sub> to produce, among other products, Power-To-Liquid fuels. The modular approach is being used for the first time in a pioneer plant and large-scale industrial PtL project in Germany. The modular concept of the plants allows scalability over several stages, keeping the planning and construction efforts manageable and improving the cost-benefit ratio.



### First trans-Atlantic flight on 100% Drop-In Sustainable Aviation Fuel [42]

In 2023, Virgin Atlantic Flight 100 flew on 100% SAF from London to New York, marking the culmination of a year of collaboration to demonstrate the capability of SAF as a safe drop-in replacement for fossil derived jet fuel that is compatible with today's engines, airframes, and fuel infrastructure. Flown on a Boeing 787, using Rolls-Royce Trent 1000 engines, the flight marked a world first on 100% Drop-In SAF by a commercial airline across the Atlantic. The SAF used was 88% HEFA (Hydroprocessed Esters and Fatty Acids) made from waste fats and 12% SAK (Synthetic Aromatic Kerosene) made from plant sugars. It is estimated that the use of SAF reduced nvPM emissions by 40% and CO<sub>2</sub> emissions by 64%, as well as an overall improvement in fuel burn efficiency as the SAF produced 1% more energy compared to the same mass of fossil fuel.



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### 3. AIR TRAFFIC MANAGEMENT AND OPERATIONAL IMPROVEMENTS

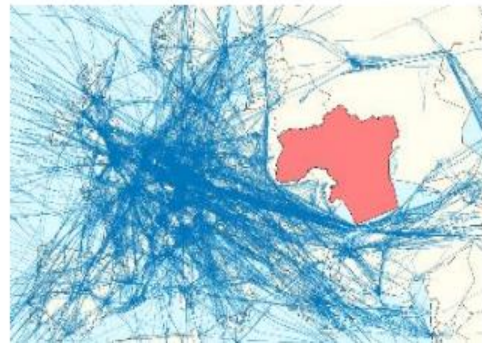
- The Single European Sky (SES2+) proposal of the Commission was formally adopted by the Council and the European Parliament in 2024, although only modest progress was made and various issues were left unresolved.
- Implementation of SES2+, and a focus on continuous improvement to address unresolved issues, is critical to enhance capacity, efficiency and sustainability.
- RP4 (2025-2029) SES performance targets reflect the ambition to enhance environmental performance, as does the desire to develop improved environmental monitoring indicators while building up resilience and strengthening capacity.
- It is recognized that the SES performance scheme needs to be improved in terms of the ATM-related performance indicators for environment. Work is ongoing to identify a more robust KPI which, after a period of monitoring and analysis during RP4, will be ready for performance target setting in RP5.
- Updated SES ATM Master Plan has been aligned with the RP4 ambitions such that ANSPs invest in technologies to provide greener, smarter and more effective air traffic.
- Ambitious environmental performance targets cannot be achieved unless the ATM system supports and incentivises all stakeholders to optimize the efficiency of their operations.
- 400 million tonnes of CO<sub>2</sub> emissions (9.3% less CO<sub>2</sub> per flight) could be saved with the completion of the SES ATM Master Plan vision by 2050.
- The war in Ukraine and the Middle East conflict, and the subsequent impact on EU airspace, has made it more difficult to assess whether ATM actions towards improving environmental performance indicators have resulted in tangible benefits.
- During busy periods, Air Traffic Controllers may need to use alternative procedures to maintain required aircraft separation, thereby limiting the capacity to accommodate fuel

efficient Continuous Descent Operations.

- Total gate to gate CO<sub>2</sub> emissions broken down by flight phase indicates that highest emissions originate from cruise phase (62.9%) and climb phase (23.2%).
- The implementation of cross-border, free route airspace (FRA) significantly improves en-route environmental performance. Up to 94,000 tonnes of annual CO<sub>2</sub> emissions are estimated to be saved by 2026 through the Borealis Alliance FRA implementation among 9 States.
- Air traffic control strikes in 2023 had a significant environmental impact with an additional 96,000 km flown and 1,200 tonnes of CO<sub>2</sub> emissions due to knock-on effects across neighbouring States and the wider SES Network.
- SESAR study estimated that €1 invested in Common Project 1 (CP1) ATM functionalities during 2023 resulted in €1.5 in monetizable benefits and 0.6 kg of CO<sub>2</sub> savings, and these benefits are expected to increase overtime as CP1 is fully implemented.

### 3.1 Single European Sky

In the last few years, air traffic has continued to recover following the COVID pandemic and the number of flights to or from EU27+EFTA airports was 8.35 million during 2023. This is a 8.5% increase compared to 2022 (7.69 million) but still 9.1% below the level of 2019 (9.19 million). Growth rates at the State level have been unevenly distributed due to changes in traffic flows resulting from the war in Ukraine since 2022, changes in holiday traffic and less domestic traffic in several States.



The closure of Ukraine's airspace to commercial traffic was amplified by reciprocal airspace bans for Russian and many Western operators. While most of the European traffic is not directly affected by the airspace closures, east-west flights between Europe and Asia that previously travelled through Russian airspace need to divert, which adds travel time and fuel burn thereby lowering flight efficiency.

In 2004, the Commission launched the Single European Sky (SES) [1] representing a holistic framework to harmonise and improve the performance of Air Traffic Management (ATM) in terms of safety, capacity, cost-efficiency and the environment. The SES builds on five inter-related pillars: economic regulation, airspace organisation/network management, technological innovation, safety and Human Dimension. The SESAR (Single European Sky ATM Research and Development) project is the technological innovation pillar of the SES aiming to modernise ATM through the innovation cycle of defining, developing and deploying innovative technological systems and operational procedures. The goal is to achieve the 'digital European sky' defined in the European ATM Master Plan [2], which is a common roadmap

to establish Europe as the most efficient and environmentally friendly sky in the world. It includes the goal to reduce the average CO<sub>2</sub> emission per flight by 9.3% (600 kg) by 2050. A key element in achieving that goal is the deployment of Common Project One (CP1) [25], which facilitate service provision along optimized routes from gate to gate and thereby reduce both CO<sub>2</sub> and non-CO<sub>2</sub> emissions.

The SES has evolved over time and has significantly benefited ATM in Europe. Nevertheless, a profound reform of the SES was considered necessary to more effectively reach the above-mentioned objectives, which led to the Commission launching the 'SES2+' proposal in 2020. The process for adopting the SES2+ was challenging and heavily discussed, but a political agreement was finally reached between the European Parliament and the Council and the new Regulation was adopted in 2024.

While the SES2+ outcome strengthens economic performance regulation and incentivises environmental performance by establishing the Performance Review Body (PRB) on a permanent basis, only modest progress was made and many issues were left unresolved. For example, the Network Manager<sup>30</sup> lacks the means to ensure that ANSPs deliver the promised and much needed capacity to the network when demand from airlines is high. In addition, while SESAR has enhanced coordination between stakeholders through the ATM innovation cycle, the transition from development to deployment of SESAR solutions by ANSPs, airport operators and airspace users across Europe has proven difficult and subsequently led to insufficient progress in modernising the ATM system. This may be due to national requirements in airspace design and security issues, thereby making it complex in identifying universal solutions for monopolistic and state-owned Air Navigation Service Providers (ANSPs). All these points could contribute to challenges in terms of adopting technological innovation, responsiveness to demand and cost base adjustments, and cooperation between ANSPs.

The goal of climate neutrality by 2050 calls for the EU to ensure decarbonisation of the air transport sector. Likewise, the Zero Pollution Action Plan includes goals for reducing impacts from noise and air quality. Ambitious targets such as these cannot be achieved unless the ATM system supports and incentivises air navigation service providers (ANSPs), airport operators and aircraft users to optimize the efficiency of their operations and thus reduce excess fuel burn and emissions to a minimum.

Enhanced airspace organisation that minimises the inefficient use of available airspace, primarily through improved airspace and air traffic control sector design and effective airspace management procedures (civil-military coordination), are additional ATM tools to enable and allow for fuel efficient flight trajectories. Continuous improvement should be fostered at both local and network level.

While a significant progress has already been made in the ATM domain, it is important to now implement the SES2+ reform and focus on continuous improvements in infrastructure

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<sup>30</sup> Commission Implementing Decision (EU) 2019/709 [4] renewed the appointment of EUROCONTROL as Network Manager (NM) for the period 2020-2029. EASA continues to act as the competent authority that certifies and oversees the NM. The NM coordinates operational stakeholders in order to manage demand through flow and capacity management, thereby optimising the network performance to limit unnecessary fuel burn and emissions.



and operational procedures, notably through closer cooperation between all stakeholders and faster deployment of SESAR solutions.

### 3.2 SES environmental performance and targets

#### Overall context

Reference Period 2 (RP2)	2015-2019
Reference Period 3 (RP3)	2020-2024
Reference Period 4 (RP4)	2025-2029
Reference Period 5 (RP5)	2030 -2034

The SES Performance and Charging Scheme [6] defines key performance indicators (KPIs) for air navigation services and network functions, which are used for performance target setting at Union-wide and local levels in the key performance areas (KPAs) of environment, safety, cost efficiency and capacity. SES Performance Scheme Reference Periods (RP) are divided into five-year periods. This report captures the results of RP2 and RP3, while highlighting intentions for RP4 and preparations for future RP5 changes (e.g. safety monitoring but no KPA, climate and environmental KPA). The environmental performance dimension of SES involves both target setting to drive improvements as well as and the monitoring and reporting on environmental performance indicators.

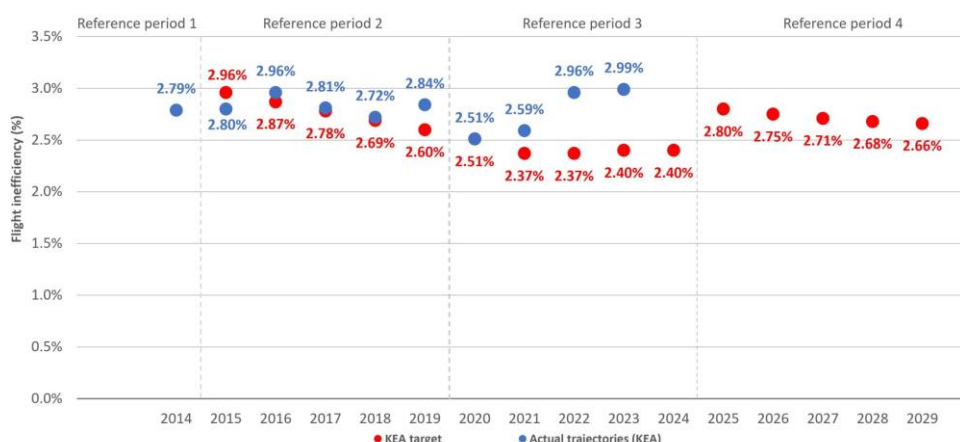
#### Key Performance Indicator for environment (with targets)

During RP3, environmental performance has been measured through one KPI, namely horizontal en-route flight efficiency of the actual flight path (KEA). KEA measures the additional distance flown in comparison to the great circle distance (shortest distance between two airports).

The higher the KEA inefficiency value, the worse the performance. However, other factors such as wind, weather, airspace structures, and network constraints influence the optimum trajectory. One of the objectives of the SES2+ proposal from the Commission was to develop a more suitable KPI on environmental performance for RP4. However, due to the duration of the negotiations and adoption of the SES2+ legislation, this was not possible and is now planned for RP5.

Following the COVID pandemic, environmental performance measured against the KEA KPI deteriorated significantly in 2022 and 2023 (Figure 3.1). EU Member States were not able to meet, by a wide margin, the Union-wide environmental performance targets set for 2022 (2.37%) and for 2023 (2.40%). Unfortunately, the impact of the war in Ukraine and the subsequent restrictions in parts of EU airspace made it more difficult to assess whether ATM actions towards improving the KEA actually resulted in tangible benefits. The PRB estimates that over 26 million kilometres of additional distance was flown in 2022 as a result of missing the Union-wide target by 0.59%. This equates to approximately 118 million kilograms of excess fuel burnt (375 million kilograms of CO<sub>2</sub>).

**Figure 3.1 KEA** horizontal en-route flight inefficiency and targets for 2014 to 2029

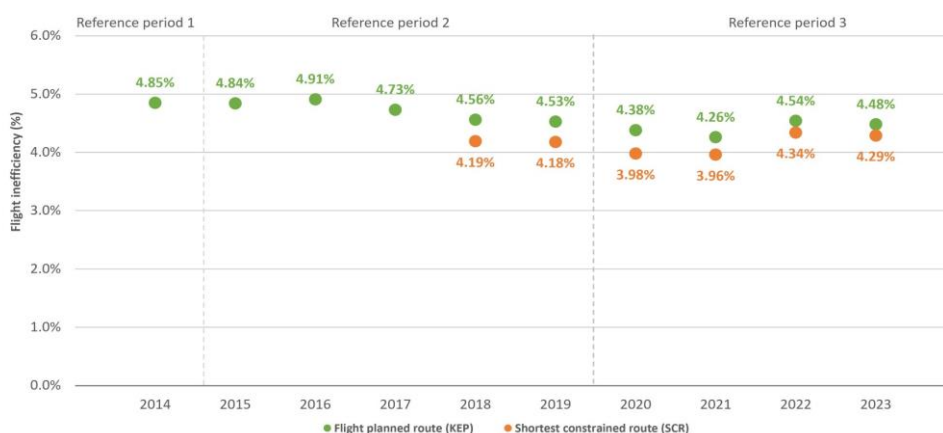


### Performance Indicators for monitoring (without targets)

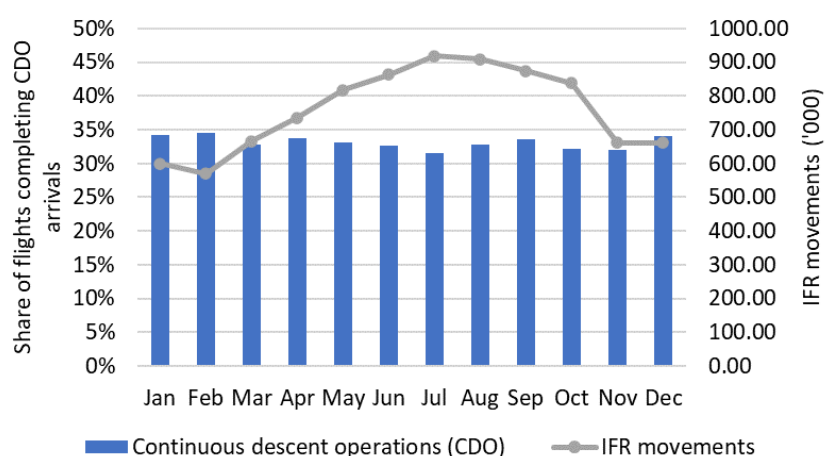
The Performance Scheme includes various indicators that are only monitored at either EU-level or local level but with no binding targets. These include the average horizontal en-route flight efficiency of the last filed flight plan trajectory (KEP)<sup>31</sup> and the shortest constrained trajectory (KES/SCR)<sup>32</sup>. As with all other indicators, KEP and KES/SCR (Figure 4.2) have been significantly affected by the war in Ukraine leading to general increases of inefficiency during 2022 and 2023, although there has been a reduction in the delta between KES/SCR and KEP. As with KEA, it is recognized that more suitable indicators are needed to give a clearer indication on the effectiveness of ANSP and Network Manager actions.

<sup>31</sup> The difference between the length of the en-route part of the last filed flight plan trajectory and the corresponding portion of the great circle distance, summed over all IFR flights within or traversing the European airspace.

<sup>32</sup> The difference between the length of the en-route part of the shortest constrained route available for flight planning, as calculated by the path finding algorithms and flight plan validation systems of the Network Manager, measured between the exit and entry points of two terminal manoeuvring areas, and the corresponding portion of the great circle distance summed over all IFR flights within or traversing the European airspace.

**Figure 3.2** KEP horizontal en-route flight inefficiency and KES/SCR for 2014 to 2023

The share of flights completing Continuous Descent Operations (CDOs) in 2023 fell by only 0.03% compared to 2022 data. The trend in terms of monthly share of CDO flights during 2023 (Figure 4.3) was fairly steady at around 30-35%, even during the summer period with a significantly higher number of flights. Air Traffic Controllers (ATCOs) will endeavour to clear aircraft for a CDO when they can guarantee safe separation all the way to final approach. However, during busy periods, ATCOs may need to use alternative ATC procedures to maintain the required separation, such as radar vectoring and speed control, which are not compatible with CDOs. As such, Figure 3.3 illustrates that there is a limited capacity to accommodate CDOs during busier periods.

**Figure 3.3** CDO vertical flight efficiency indicator for 2023

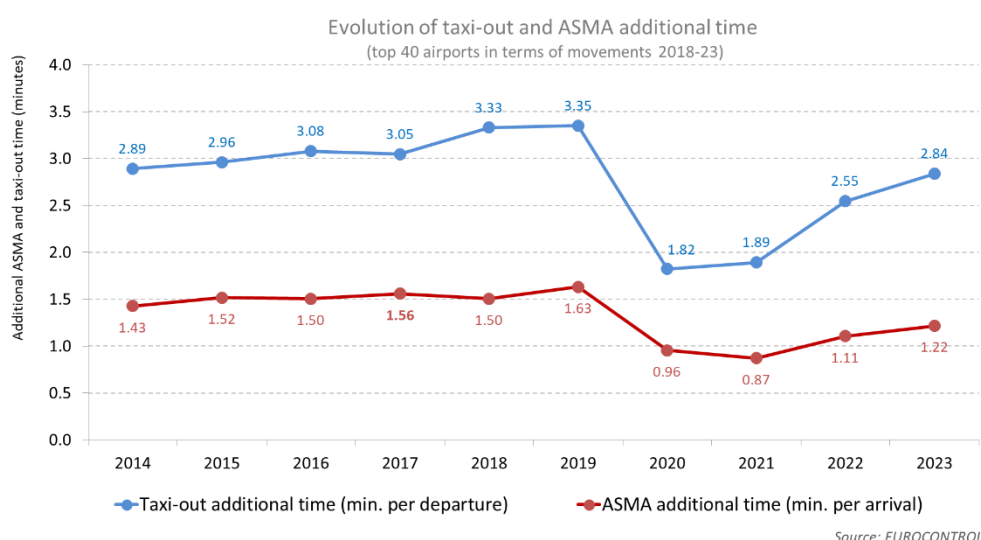
Restrictions on the number of CDOs are linked to the current ATM system. It is expected that with future Time-Based Operations (TBO), more CDOs would be facilitated by embedding them in aircraft fuel efficient trajectories.

### Additional time in the Arrival Sequencing and Metering Area (ASMA time)

Additional ASMA time, otherwise known as airborne holdings, has a direct impact in terms of increased fuel burn. There is a clear interest in finding a balance between regulating arrivals by absorbing delays on the ground and airborne delays during the approach phase. Airborne delays allow for tactical management of the arrival flow, potentially optimizing the approach sequence and maximizing runway throughput. However, excessive airborne delays are unnecessary and have a clear impact on emissions. As per ASMA, extended taxi-out durations contribute to higher fuel consumption and CO<sub>2</sub> emissions. Recognizing that establishing a departure sequence enhances runway efficiency and that airports may occasionally need to clear stands for arriving flights, striking a balance between ATC pre-departure delays to regulate runway traffic and added taxi-out times is essential for minimizing environmental impacts.

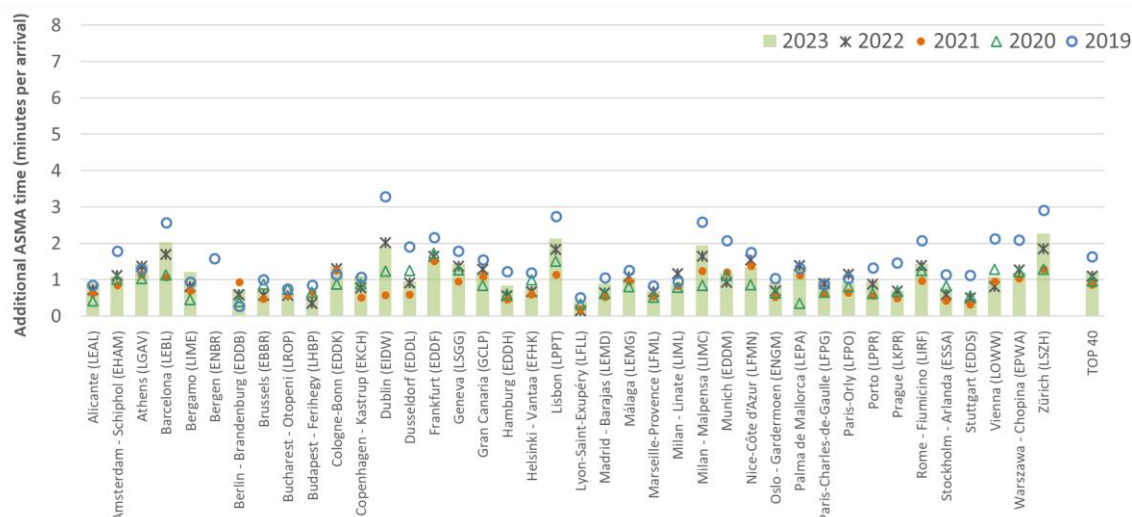
The evolution of both indicators follows a similar trend (Figure 3.4) with a slight increase during 2014-2019 followed by a significant decrease due to the drastic reduction in traffic during COVID. Traffic has since recovered such that it is only 10% below 2019 at the 40 busiest EU27+EFTA airports in 2023, while additional ASMA and taxi-out times are also increasing at the same time.

**Figure 3.4** Average additional ASMA and taxi-out times for the busiest EU27+EFTA 40 airports in terms of flight movements



Significant variations exist between the top 40 busiest EU27+EFTA airports in terms of additional ASMA time (Figure 3.5).

**Figure 3.5 ATM related inefficiencies on the arrival flow (AMSA) at the 40 busiest EU27+EFTA airports (2019-2023)**



### Forthcoming Reference Period 4 (2025-2029)

It remains essential for the ATM industry to maintain and even strengthen its commitment to contribute to the achievement of the European Green Deal goals and a more sustainable future of the aviation. The RP4 Union-wide performance targets [42] reflect the ambition of enhancing environmental performance and sustainability while building up resilience and strengthening capacity as well as reducing costs. It is also should be noted that PRB has developed a Traffic Light System to assess Member States environmental performance [43].

The PRB advice to the European Commission regarding the performance indicators for RP4 placed a focus on improving the ATM environmental performance by prioritising actions which enable airspace users to fly the most fuel-efficient trajectories, and thus reduce the fuel burn gate-to-gate [41]. In the interest of better flight efficiency in European airspace, all efforts need to be made by ANSPs and the Network Manager to support fuel-efficient trajectories, avoiding detours and delays due capacity hotspots.

Given the interdependency between the environment and capacity KPAs, it is crucial to address the long-term capacity shortages faced by certain ANSPs in order to enable the required environmental performance improvements. Such capacity issues have been observed since the second SES Reference Period (2015-2019), and they have re-emerged during the recovery from the COVID-19 crisis due to insufficient ATCOs in the core area of Europe to adequately meet traffic demand.

Recognising the forecasted traffic growth during RP4, which may impact the complexity of operations, and the continued consequences of the war in Ukraine, the future RP4 environmental targets improve following a step-wise approach with KEA targets reducing from 2.80% for 2025 to 2.66% for 2029. Progress has also been made in the development of

new and revised performance monitoring indicators (PIs), including within the environmental area, that draw on the results of a study conducted by the Commission. These are currently being discussed by the Single Sky Committee with a view to their possible use during RP4.

### **Preparations for Reference Period 5 (2030-2034)**

The new rules to be developed for the performance and charging scheme on the basis of the SES2+ Regulation will start to apply during RP5. This includes a single key performance area that would cover both environmental and climate aspects, as well as a requirement for binding targets for terminal air navigation services provided that adequate environmental indicators are identified and put in place.

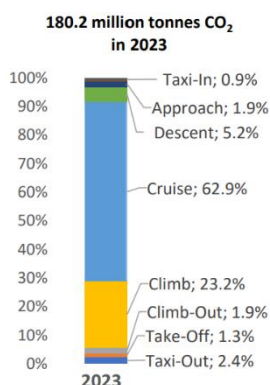
The SES performance and charging scheme aims to capture the relationship between flight routing and environmental impacts, and existing indicators were previously regarded as reasonable proxy measures to incentivise ANSP efficiency. However, limitations with the current environmental KPI/PIs have been identified and were confirmed during the COVID pandemic, when some Member States were unable to meet their environmental targets despite a dramatic reduction in traffic. These weaknesses should be borne in mind when drawing conclusions on the basis of the existing KEA KPI, especially when considering the performance achieved at the level of an individual EU Member State's airspace.

It is recognized that the SES performance scheme needs to be improved in terms of the ATM-related performance indicators for environment. KEA does not provide the needed granularity at national level to specifically assess the contribution of ATM to environmental efficiency. However, while this main KPI is not considered fit for purpose, gaining agreement on alternative has proved complicated. Work is now ongoing to find a more robust KPI which, after a period of monitoring and analysis during RP4, will be ready for performance target setting in RP5 and beyond.

## **3.3. Operational performance indicators**

### **Total gate to gate CO<sub>2</sub> emissions**

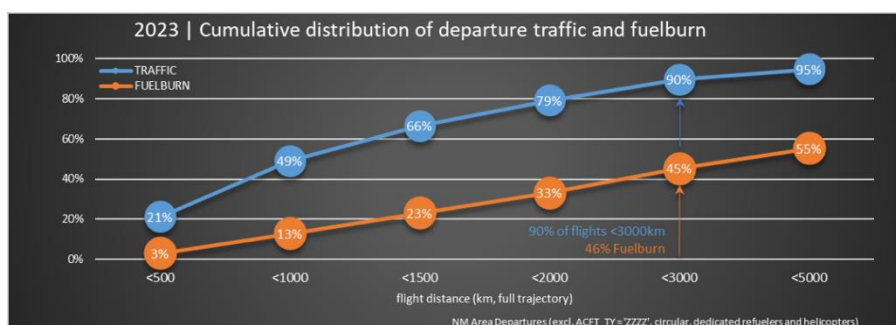
The total gate to gate CO<sub>2</sub> emissions within the EUROCONTROL area [39], or the part of the trajectory within the airspace for flights to and from the area, were 180.2 million tonnes in 2023, which represents an increase of 14% over 2022. Figure 3.6 illustrates the breakdown of these CO<sub>2</sub> emissions by flight phase and, as expected, the cruise and climb phases have the highest share of emissions with 63% and 23% respectively. While much less inefficiencies are detected in the climb phase than in the descent phase, and consequently more attention was given to the descent phase, it is important to note that even a small percentage of inefficiency during the climb can result in a significant amount of additional CO<sub>2</sub>.

**Figure 4.6** Total CO<sub>2</sub> emissions by flight phase within the EUROCONTROL area during 2023

### Network Fuel Burn

The SES Network Manager (NM) has developed an Excess Fuel Burn (XFB) metric as a measure of the fuel inefficiency on a particular route for a particular aircraft type, compared to a reference based on the best performer on that city pair / aircraft type combination.

Subsequently, the NM has enhanced its fuel burn dataset with fuel profiles for all flights, including fuel burn at specific points along the flight profile, and presents it in different ways on the NM's CO<sub>2</sub>MPASS dashboard [30]. Figure 3.7 highlights that 95% of NM departures fly less than 5,000km and represent 55% of total fuel burn, meaning that just 5% of departures representing long-haul flights greater than 5,000km burn 45% of total fuel.

**Figure 4.7** Cumulative distribution of departure and fuel burn in 2023

### Free Route Airspace

Free Route Airspace (FRA) is a SESAR solution that is defined as a volume of airspace within which users may freely plan a route between any defined entry and exit points, subject to airspace availability [15]. The continuous implementation of FRA in Europe over the past years has been an enabler for improved flight efficiency, as it provides airlines with greater flexibility to file more efficient flight plans. However, FRA must not only be implemented but also applied by airlines to reap the benefits.

In line with the European ATM Master Plan and EC Regulation No. 2021/116, FRA implementation with cross-border dimension and connectivity to Terminal Manoeuvring Areas (TMA)

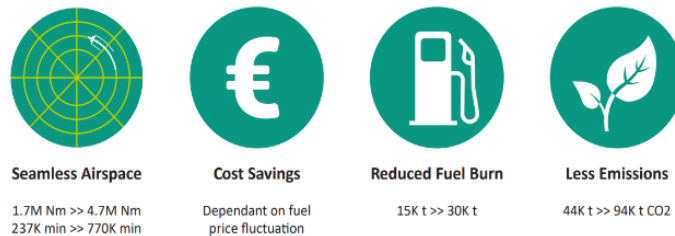


should be completed by 31 December 2025. Cross-border FRA areas have been implemented between the following States:

- BALTIC FRA: Poland and Lithuania.
- BOREALIS FRA: Denmark, Estonia, Ireland, Iceland, Finland, Latvia, Norway, Sweden and United Kingdom.
- SECSI FRA: Albania, Austria, Bosnia and Herzegovina, Croatia, Montenegro, North Macedonia, Serbia and Slovenia.
- SEE FRA: Bulgaria, Czech Republic, Hungary, Republic of Moldova, Romania and Slovakia.
- BALTIC FRA and SEE FRA.
- SECSI FRA and FRA IT

The Borealis Alliance (a collaboration of ANSPs from Denmark, Estonia, Finland, Iceland, Ireland, Latvia, Norway, Sweden and the United Kingdom) is a pioneer in the implementation of a cross-border FRA among its nine national airspaces. Whilst




implementation has been slowed down by the COVID crisis, full implementation is still planned by the end of 2026. The above figure illustrates the actual benefits of FRA achieved in 2018 and the estimated annual gains in 2026 with full FRA implementation.



## Impact of strikes on European Aviation

Between 1 March and 9 April 2023, there were 34 days with industrial action impacting air transport in Europe, mostly in France but also, to a lesser extent, in Germany. As context, for the whole of 2022, there were 5 days of industrial action in France. The 34 days of strikes in 2023 potentially impacted 237,000 flights (flights to, from or across the countries mentioned above, mainly France). By comparison, the airspace closures in Europe resulting from the eruption of the Eyjafjallajökull volcano in 2010 (15-22 April) led to the disruption of some 100,000 flights.

In addition to the impact on passengers, strikes can also have a large environmental footprint. EUROCONTROL estimates that an extra 96,000 km were flown each strike day in 2023, with an average additional 386 tons of fuel burnt and 1,200 tons of CO<sub>2</sub> emissions [31]. The average cost to aircraft operators of cancellations and delays was €14 million per day.

Each Strike Day (during 7 March - 9 April)	
	96,000 additional km flown
	386 tons of additional fuel burnt
	1,200 additional tons of CO <sub>2</sub> emissions



As an example, on 12 March, around 40 flights had to extend their path by at least 370 km in order to avoid French airspace (when compared to their flight plans on 5 March, a non-strike day). These strikes also impacted up to 30% of flights across the continent, highlighting the disproportionate impact that disruptions in one country can have on neighbouring countries and the European Network as a whole. Although France does have minimum service provisions, preventing the complete closure of its ATC operations, these do not protect overflights. Minimum service regulations across Europe that protect overflights (such as are seen in, for example, Italy and Spain) would go some way to protect the flying public from the type of disruption as well as the associated environmental impact.

### 3.5 SESAR: Towards the digital European sky

#### SESAR Research and Development



The first SESAR Joint Undertaking was established in 2007 as the EU body responsible for the research and development phase of the SESAR innovation cycle. It has produced over 100 solutions with an estimated combined benefit that could enable a 4% reduction in CO<sub>2</sub> emissions per flight. The online SESAR solutions catalogue contains technical information on these solutions and their level of deployment as reported by European states [32].

The current SESAR 3 Joint Undertaking [36] has a 10-year mandate (2021-2031) to continue this work. During 2024, the European ATM Master Plan was updated to define the critical path for establishing Europe as the most efficient and environmentally friendly sky to fly in the world. It defines the Strategic Deployment Objectives and Development Priorities, providing a framework to facilitate the roll out of SESAR solutions and shaping the European position to drive the global agenda for ATM modernisation at ICAO level.

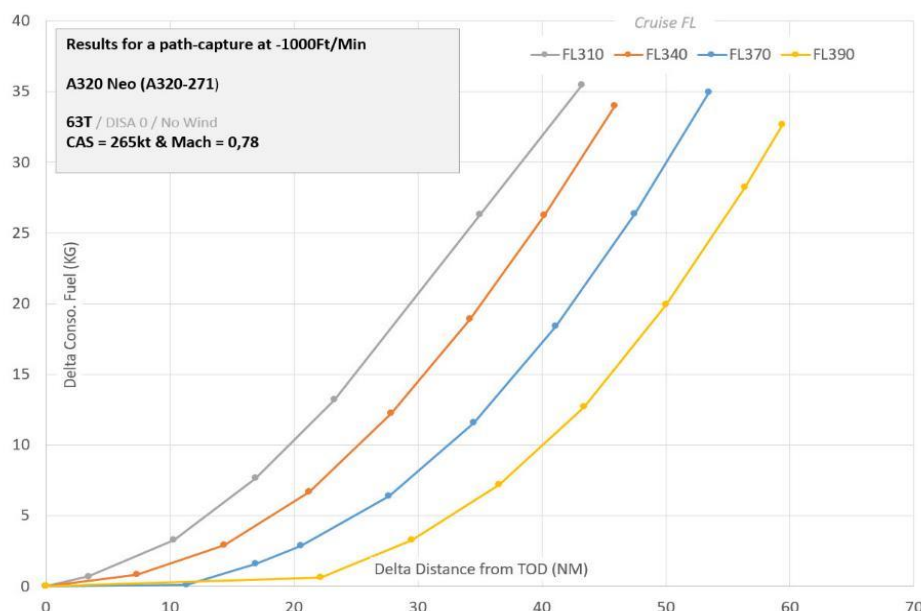
The implementation of a first critical sub-set of SESAR solutions is mandated by the Common Project 1 (CP1), ensuring a coordinated and timely deployment of key enablers for Trajectory-Based Operations (TBO) and for establishing a digital backbone for the Single European Sky (SES).

Improvements in all phases of flight SESAR addresses the full scope of aviation's environmental impacts, from CO<sub>2</sub> and non-CO<sub>2</sub> emissions to noise and air quality at every phase of flight.

- **TAXI phase.** During the ground part of the trajectory, a key objective is to reduce the engine-on time. Increasing the predictability of the take-off clearance time avoids waiting time at the runway holding point. In addition, single-engine taxi and engine-off taxi, where aircraft are towed by a sustainable taxi vehicle, can reduce overall engine emissions. The expected reduction of emissions from an engine-off taxi initiative can be over 50% that also was showed cased in ALBATROSS project [34].
- **CLIMB and DESCENT phases.** The focus in this phase is to leverage the availability of the optimum profile for each individual flight through the Extended Projected Profile (EPP), where aircraft tend to start their descent on average 35-70 nautical miles (nmi) before what would be their optimum Top-of-Descent (ToD) point<sup>33</sup>. This leads to long thrust descent, which is inefficient even if it does not include intermediate level-offs (Figure 3.8). The EPP provides visibility of the optimum top-of-climb and top-of-descent points on the ground, making it possible for air traffic controllers to facilitate a better trajectory. In addition, SESAR advocates a transition from conventional fixed arrival routes commonly used today, towards a more dynamic deployment of RNP (Required Navigation Performance) route structures within the Terminal Manoeuvring Area. Utilizing these dynamic routes increases capacity during peak periods, optimizes fuel consumption during off-peak hours, and decreases the noise footprint particularly during nighttime operations. Moreover, the adoption of these dynamic routes enables agile responses to fluctuations in operational conditions.

<sup>33</sup> SESAR Optimised Profile Descents Demonstration Report.

**Figure 3.8** Increased fuel consumption as a function of the distance before the optimum Top of Descent that the descent phase is started, without intermediate level-offs (e.g. when a descent from cruise at FL370 is started 50nm early, the additional fuel burn is 30 kg).



- **CRUISE phase.** Free route in the horizontal domain is already widely available in Europe. As such, the enhancement of vertical flight efficiency is a priority through the provision of sufficient airspace capacity for aircraft to fly at their optimum altitude. While the exact increase in emissions varies based on aircraft type and specific flight conditions, studies suggest that flying at lower altitudes can increase fuel consumption by approximately 6-12% compared to optimal cruising altitudes [21;22]. An increase in capacity can be achieved via digital and automation support for all ATM processes, including air traffic controllers, such as Dynamic Route Availability Document (RAD) that results in fewer vertical restrictions both at flight-planning and during the flight [33]. ATM may also evolve to support the deviation of flights to avoid cruising within airspace where non-CO<sub>2</sub> impacts are disproportionately high (referred to as eco-sensitive volumes).

The SESAR 3 Joint Undertaking has also provided support to operational stakeholders in the monitoring and management of their environmental performance in the planning, execution, and post-operation phases. At the airport level, this includes the full integration of environmental performance monitoring with the Airport Operations Plan (AOP) [35].

#### Trajectory optimisation in a digital environment

The deviation from the flight plan during the execution of the flight, for example by allowing an unplanned shortening of the flight path, allows fuel savings and reduced emissions for the flight concerned and its specific flight phase. However, this can have a negative impact on the predictability of the air traffic network, which in turn could have a negative impact on the environment. Trajectory-Based Operational (TBO) concepts ensure the free flow of information between air traffic management units and the Network Manager, allowing rapid

sharing of trajectory information across the network and increased flexibility in the execution of the flight for airspace users.

The updated ATM Master Plan has defined the European TBO roadmap for the 2025–2045 period with the ambition of guaranteeing continuous and precise optimisation of all aircraft trajectories throughout their life cycle, from planning to execution, from gate to gate, even in congested airspace. With the potential introduction of zero emissions aircraft beyond 2035, their specific performance characteristics will also need to be considered in terms of any impact on the Network.

## SESAR Deployment



The SESAR Deployment Manager [36] plans, synchronises, coordinates and monitors the implementation of the 'Common Projects' that mandate the synchronised deployment of selected ATM functionalities (AF) based on SESAR solutions. The current Common Project (CP1) [EU 2021/116] has 6 AF (Figure 3.9) aiming to reduce inefficiencies and thus generate fuel and CO<sub>2</sub> savings in different phases of the flight, especially cruise. The SESAR Deployment Programme [38] defines how the operational stakeholders will implement CP1 AF, which is due to be completed by 31 December 2027. The expected performance benefits from CP1 AF represent approximately 20% of the European ATM Master Plan performance ambitions for 2035 [40] and will be a critical step towards sustainable ATM-related aviation in Europe. 65% of CP1 CO<sub>2</sub> savings are expected to be found in the cruise phase, 25% in the descent phase and 10% in the taxi-out phase. By the end of 2023, [CP1] already delivered € 4.6bn worth of cumulative benefits. This value is set to reach € 19.4bn by 2030, once [the CP1] is fully deployed, whilst in a longer timespan [CP1] is expected to bring € 34.2bn worth of cumulative benefits by 2035 and € 52.3bn by 2040.

**Figure 3.9** Overview of Common Projects 1 (CP1) ATM Functionalities

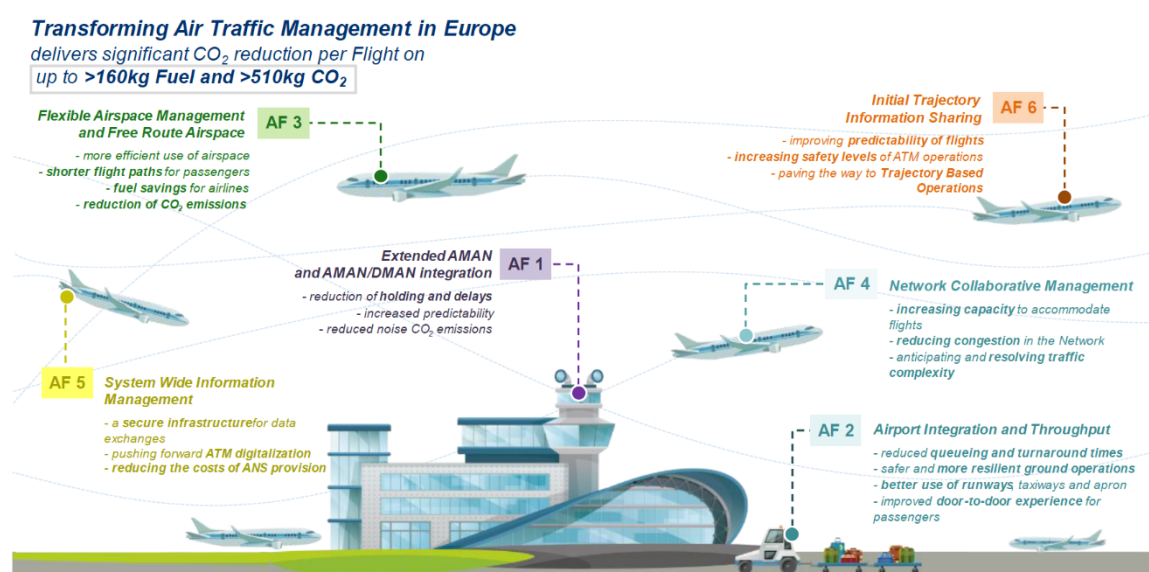


Table 3.10 below details the total CO<sub>2</sub> savings potential of concerned flights, that could be expected should all CP1 sub-AF concepts be deployed in the future ATM system with all technologies mature and realising their full benefits. The values in the table below represent an order of magnitude of CO<sub>2</sub> savings that can be expected from different sub-functionalities, and which highly depend on the specific conditions of the flight and the local situation.

**Table 3.10** CO<sub>2</sub> savings per Common Project 1 ATM Functionality

CP1 Functionality		Fuel saving per flight concerned	CO <sub>2</sub> savings per flight concerned	Time saving per flight concerned	% of ECAC flights concerned	Flight phase concerned
AF1	Departure Management Synchronised with Pre-departure sequencing	[2.9 – 10 kg]	[9.2 - 31.5 kg]	[0.5 – 1 min]	30%	Taxiing phase
	Initial/ extended AOP	[0.4 – 0.8 kg]	[1.2 - 2.5 kg]	[0.1 – 0.1 min]	70%	Taxiing phase
AF2	Airport Safety Nets	[0.1 – 3.1 kg]	[0.3 - 9.7 kg]	[0.01 – 0.01 min]	30%	Taxiing phase
AF3	ASM and A-FUA	[8 – 41.7 kg]	[25.2 - 131.3 kg]	[0.15 – 0.55 min]	10%	Cruising phase
	Enhanced Free Route Airspace Operations	[35 – 58 kg]	[110.2 - 182.7 kg]	[1 – 2 min]	75%	Cruising phase
AF4	Enhanced Short Term ATFCM Measures	n/a		[0.3 – 0.4 min]	5%	Pre departure phase
	Interactive rolling NOP	n/a		[0.2 – 0.3 min]	50%	Pre departure phase
AF5	Automated Support for Traffic Complexity Assessment and Flight Planning interfaces	n/a		[0.1 – 0.2 min]	70%	Pre departure phase
AF6	Initial AirGround Trajectory Information Sharing	[8 – 12 kg]	[25.2 - 37.8 kg]	[0.05 – 0.1 min]	90%	Cruising phase

The benefit-cost ratio (BCR) of the investment in CP1 AF shows the value of the investment by comparing the costs of a project with the benefit that it generates. In this case, it has

been estimated that every euro invested into CP1 deployment brought 1.5 euros in return during 2023 to the stakeholders in terms of monetizable benefits, as well as 0.6 kg of CO<sub>2</sub> savings (Table 3.2). Furthermore, the BCR and CO<sub>2</sub> savings are expected to increase over-time as CP1 AF are fully implemented (Table 3.3).

**Table 3.2 Benefit-Cost Ratio and CO<sub>2</sub> savings from CP1 AF implementation**

Metric	Already achieved↓			
	2023	2030	2035	2040
Benefit-cost ratio <sup>13</sup>	<b>1.5</b>	3.8	5.9	8.0
CO <sub>2</sub> kg saved per € invested <sup>14</sup>	<b>0.6</b>	2.2	4.0	6.0

**Table 3.3** Savings in fuel and CO<sub>2</sub> emissions per flight in 2023 and the forecast out to 2040

Metric	Already achieved			
	2023	2030	2035	2040
Fuel kg saved	<b>7.0 kg</b>	42.3 kg	47.0 kg	47.8 kg
CO <sub>2</sub> kg saved	<b>22.1 kg</b>	133.2 kg	147.9 kg	150.5 kg



## STAKEHOLDER ACTIONS

### Improving flight efficiency in Skyguide's airspace

Skyguide introduced Free Route Airspace (FRA) within the area under its responsibility at the end of 2022 (Switzerland and parts of France, Italy, Germany and Austria). One of the objectives of Skyguide's FRA project was to optimise flight trajectories between Switzerland and Germany, independent of airspace boundaries. A post-implementation analysis confirmed significant improvements in horizontal flight efficiency. Compared with the pre-COVID period, planned flight paths within Swiss airspace have been improved by 22%. As a result of cross-border FRA, horizontal flight efficiency performance at the Skyguide-DFS interface has also improved significantly, with planned and flown trajectories at the entry points improving by 16% and 19% respectively. In 2023, despite a 5% increase in traffic compared with 2022, planned and flown trajectories improved by 13% and 2% respectively, thanks mainly to Skyguide's cross-border FRA.



### CiCERO – Citizen and Community Empowerment in Route Optimization

Austro Control, in collaboration with the Federal Government, is enhancing transparency and public involvement regarding air traffic noise in Austrian airspace. In 2024, an innovative public participation process was launched, inviting citizens to engage and actively shape instrument flight rules (IFR) arrival and departure procedure changes in Austria. Through this initiative, citizens can propose enhancements to existing IFR routes and provide valuable feedback on new or modified routes. Submissions are reviewed by an expert panel, ensuring every input is considered and assessed. In the first two months of operation, more than 500 inputs were recorded and processed. The entire process is transparently documented, with Austro Control keeping the public informed every step of the way. It aims to enhance quality of life by reducing noise and fostering a safer, punctual, and environmentally friendly air traffic system.



### CONCERTO – Dynamic Collaboration to Generalize Eco-friendly Trajectories

The CONCERTO project aims to make eco-friendly trajectories an everyday occurrence in order to reduce the CO<sub>2</sub> and non-CO<sub>2</sub> impact of aviation. The project will look to integrate green air traffic control capacity into the system, and support stakeholders in balancing regularity and environmental



performance at local and network levels. The project will do so by leveraging state-of-the-art climate science and data to allow ATM stakeholders to take their “eco-responsibility” to the next level. At the same time the project aims to demonstrate that mitigation measures can be deployed progressively at network level, in sync with scientific progress.

## List of Resources

- [1] EC (2004), Regulation (EC) No 549/2004 laying down the framework for the creation of the Single European Sky; **Regulation (EC) No 550/2004 of the European Parliament and of the Council of 10 March 2004 on the provision of air navigation services in the Single European Sky**; Regulation (EC) No 551/2004 of the European Parliament and of the Council of 10 March 2004 on the organisation and use of the airspace in the single European sky (the airspace Regulation)
- [2] SESAR (2020), European ATM Master Plan.
- [3] EU (2019), Regulation (EU) 2019/123 of 24 January 2019 laying down detailed rules for the implementation of air traffic management (ATM) network functions.
- [4] EU (2019), Decision (EU) 2019/709 of 6 May 2019 on the appointment of the Network Manager for air traffic management (ATM) network functions of the Single European Sky.
- [5] EU (2021), Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe.
- [6] EU (2019), Regulation (EU) 2019/317 of 11 February 2019 laying down a performance and charging scheme in the single European sky.
- [7] PRB (2019), PRB Monitoring Report 2020.
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- [9] EU (2020), Regulation (EU) 2020/1627 of 3 November 2020 on exceptional measures for the third reference period (2020-2024).
- [10] EUROCONTROL (2022), Route Availability Document (RAD).
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- [12] EUROCONTROL (2019), Fuel Tankering: Economic Benefits and Environmental Impact.
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- [14] EUROCONTROL Network Manager (2022), Optimised operational performance.
- [15] EUROCONTROL (2022), Free route airspace.
- [16] EUROCONTROL (2021), European Route Network Improvement Plan (ERNIP) - Part 2.
- [17] EUROCONTROL (2020), European Continuous Climb and Descent Operations Action Plan.
- [18] EUROCONTROL (2022), Vertical flight efficiency at airports.
- [19] SESAR Dreams Project (2020), Initial Trajectory Information Sharing.
- [20] EUROCONTROL (2022), EUROCONTROL learning zone.
- [21] SESAR (2021), SESAR Solutions Catalogue charting progress towards the Digital European Sky.

- [22] SESAR (2020), Albatross Project.
- [23] SESAR (2021), SESAR 3 Joint Undertaking Multiannual Work Programme 2022-2031.
- [24] SESAR Deployment Manager (2022), SESAR Deployment Manager.
- [25] EU (2021), Regulation (EU) 2021/116 - Common Project 1 Regulation.
- [26] SESAR (2022), SORT - Improving runway throughput in one airport.
- [27] SESAR (2022), ADSCENSIO - ADS-C Enables and supports improved ATM operations.
- [28] SESAR (2021), Airbus - Fello'fly.
- [30] EUROCONTROL (2024), CO<sub>2</sub>MPASS Interactive Dashboard.
- [31] EUROCONTROL (2023), Impact of strikes on European Aviation.
- [32] SESAR (2021), SESAR Solutions Catalogue.
- [33] SESAR (2024), Dynamic Route Availability Document (RAD).
- [35] SESAR (2024), Airport Operations Plan (AOP).
- [36] EU (2021), SESAR Single Basic Act.
- [37] EU (2013), SESAR Deployment Framework.
- [38] SESAR (2022), SESAR Deployment Programme 2022.
- [39] EUROCONTROL (2025), EUROCONTROL Area.
- [40] SESAR (2025), SESAR Deployment Manager.
- [41] PRB(2024), PRB report - [https://eu-single-sky.transport.ec.europa.eu/news/prb-advice-union-wide-targets-rp4-feedback-period-draft-commission-implementing-decision-opened-2024-03-25\\_en](https://eu-single-sky.transport.ec.europa.eu/news/prb-advice-union-wide-targets-rp4-feedback-period-draft-commission-implementing-decision-opened-2024-03-25_en)
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- [43] PRB (2024), Traffic light system for environmental performance 2023.



#### 4. MARKET-BASED MEASURES

- Market-based measures incentivise 'in-sector' emissions reductions from technology, operational measures and sustainable aviation fuels, while also addressing residual emissions through 'out-of-sector' measures.
- Emissions trading systems (e.g. ETS) have a greenhouse gas emissions cap covering various economic sectors, while offsetting schemes (e.g. CORSIA) compensate for emissions via reductions in other sectors but without an associated cap.
- During 2013 to 2023, the EU ETS led to a net CO<sub>2</sub> emissions reduction in aviation of 206 Mt through funding of emissions reductions in other sectors, of which 47 Mt in 2021-2023.
- EU ETS allowance prices have increased in the recent years, reaching an average annual price of more than €80 per tonne of CO<sub>2</sub> in 2022 and 2023.
- Revisions were agreed to the EU ETS in 2023, including a gradual phase-out of free allowances to airlines and a reduction to the aviation emissions cap from 2024 onwards.
- Monitoring, reporting and verification of CO<sub>2</sub> emissions under CORSIA began in 2019. As of 2025, 128 out of 193 ICAO States have volunteered to participate in the CORSIA offsetting scheme.
- Offsetting under the CORSIA scheme is expected to start in 2024. A total of 19Mt of CO<sub>2</sub> emissions are forecast to be offset for flights departing from Europe during CORSIA's first phase in 2024-2026.
- The first emissions units have now been authorized for use in CORSIA, complying with the UNFCCC rules on avoidance of double-counting of emissions reductions.

- Technology to capture carbon from the air and store it underground is being developed to support the broader decarbonisation efforts of the aviation sector.
- The EU Taxonomy System sustainable finance initiative has been amended to include aviation activities.
- No agreement has been reached on proposals to revise the Energy Taxation Directive to introduce minimum rates of taxation for intra-EU passenger flights.

Future goals to address the climate impact of the aviation sector are expected to be achieved by in-sector measures (technology, operations, fuels) that are incentivised by Market-based Measures (MBMs) through pricing of carbon emissions. This chapter provides an overview of the key MBMs that have been put in place for the aviation sector, including the EU's Emissions Trading System (ETS) and ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), as well as other sustainable finance initiatives.

#### 4.1 EU Emissions Trading System

The cornerstone of the EU's policy to combat climate change is the EU Emissions Trading System. Various economic sectors (e.g. power, heat, manufacturing industries, maritime, aviation) have been included within this cap-and-trade system to incentivise CO<sub>2</sub> reduction within each sector, or through trading of allowances with other economic sectors included in the EU ETS where emission reduction costs are lower.

##### Aviation and the EU ETS

The EU decided to include aviation activities within the EU ETS in 2008 [1], and the system has been applied to aviation activities since 2012. As such, they are subject to the EU's greenhouse gas emissions reduction target of at least minus 55% by 2030 compared to 1990. The initial scope of the EU ETS covered all flights arriving at, or departing from, airports in the European Economic Area (EEA)<sup>34</sup>. However, flights to and from airports in non-EEA countries or in the outermost regions were subsequently excluded until the end of 2023 through a temporary derogation. This exclusion facilitated the negotiation of a global market-based measure for international aviation emissions at the International Civil Aviation Organisation (ICAO).

In July 2021, the European Commission adopted the 'Fit for 55' Legislative Package to make the EU's climate, energy, transport and taxation policies fit for achieving the 2030 greenhouse gas emissions reduction target. This included proposed amendments to the EU ETS Directive for aviation activities, which entered into force on 5 June 2023 [2]. The main changes to the aviation ETS are applicable from 2024 onwards, and include the following:

- Applying EU ETS for flights within and between countries in the European Economic Area, as well as departing flights to Switzerland and to the United Kingdom, while applying CORSIA

<sup>34</sup> The European Economic Area includes EU27, Norway, Iceland and Liechtenstein.



for flights to and from third countries.

- Applying EU ETS for flights between countries in the European Economic Area and the outermost regions, as well as between the outermost regions, unless they connect to the respective Member State's mainland. EU ETS also applies to flights from the outermost regions to Switzerland and the United Kingdom.
- Gradual phase-out of the free ETS allocation to airlines as follows: 25% in 2024; 50% in 2025; and 100% from 2026, meaning full auctioning of EU Allowances to the aviation sector from 2026. The free allocation for the years 2024 and 2025 is distributed according to the aircraft operators' share of verified emissions in the year 2023.
- Applying an annual linear reduction factor of 4.3% to the EU Allowances issued for aviation from 2024 onwards.
- Creation of a new incentive scheme for Sustainable Aviation Fuels (SAF). For the period from 2024 to 2030, a maximum of 20 million ETS allowances will be allocated to aircraft operators for the uplifting of SAF to cover part or all of the price difference between SAF and fossil kerosene, depending on the type of SAF used.
- Setting up a monitoring, reporting and verification system for non-CO<sub>2</sub> aviation effects<sup>35</sup>
- Assessment of CORSIA's environmental performance after the 2025 ICAO Assembly. The Commission will report in 2026 on the progress at ICAO negotiations every three years, accompanied by legislative proposals, where appropriate.

More detailed amendments to the ETS Directive are implemented through various delegated and implementing acts, which are referenced in the Directive itself.

Linking the EU ETS to other emissions trading systems is permitted provided that these systems are compatible, mandatory and have an absolute emission cap. An agreement to link the systems of the EU and Switzerland entered into force on 1 January 2020. Accordingly, flights from the EEA area to Switzerland are subject to the EU ETS, and flights from Switzerland to the EEA area fall under the Swiss ETS. Allowances from both systems can be used to compensate for emissions occurring in either system.

The Environmental Management Information Service (EMIS) of EUROCONTROL, which superseded the EU ETS Support Facility in 2023, continues to provide 28 States with access to EU ETS and ICAO CORSIA related data, as well as traffic and emissions data to over 400 aircraft operators.

### **Historic and forecasted aviation emissions under EU ETS**

The initial total amount of aviation allowances within the EU ETS in 2012 was 95% of the average annual emissions between 2004 and 2006 of flights within the full ETS applicability scope (all flights departing from or arriving in the European Economic Area), representing 221.4 million tonnes (Mt) of CO<sub>2</sub> per year. The EUAs issued for aviation activities in the ETS's third phase (2013-2020) was adjusted for the applicability scope. While aircraft operators may use EUAs as well as EU Allowances (EUAs) from the stationary sectors, stationary



installations are not permitted to use EUAAs. In addition, aircraft operators were entitled to use certain international credits (CERs) until 2020 up to a maximum of 1.5% of their verified emissions. In 2023, there were 254 aircraft operators reporting a total of 53 million tonnes (Mt) of CO<sub>2</sub> emissions under the EU ETS.

Aircraft operators are required to report verified emissions data from flights covered by the scheme on an annual basis. As is shown in Figure 4.1, total verified CO<sub>2</sub> emissions from aviation covered by the EU ETS increased from 53.5 Mt in 2013 to 68.2 Mt in 2019. This implies an average increase of CO<sub>2</sub> emissions of 4.15% per year. The impact of the COVID-19 pandemic on international aviation saw this figure fall to 25.3 Mt in 2020, representing a decrease of 63% from 2019 levels. From 2013 to 2020, the amount of annual EUAAs issued was around 38.3 Mt of which about 15% have been auctioned by the Member States, while 85% have been allocated for free. The purchase of EUAs by the aviation sector for exceeding the EUAAs issued went up from 20.4 Mt in 2013 to 32.4 Mt in 2019 contributing thereby to a reduction of around 155.6 Mt of CO<sub>2</sub> emissions from other sectors during 2013-2019. As a result of the COVID-19 pandemic, the verified emissions of 25.3Mt in 2020 were below the freely allocated allowances for the first time (see Figure 4.1).

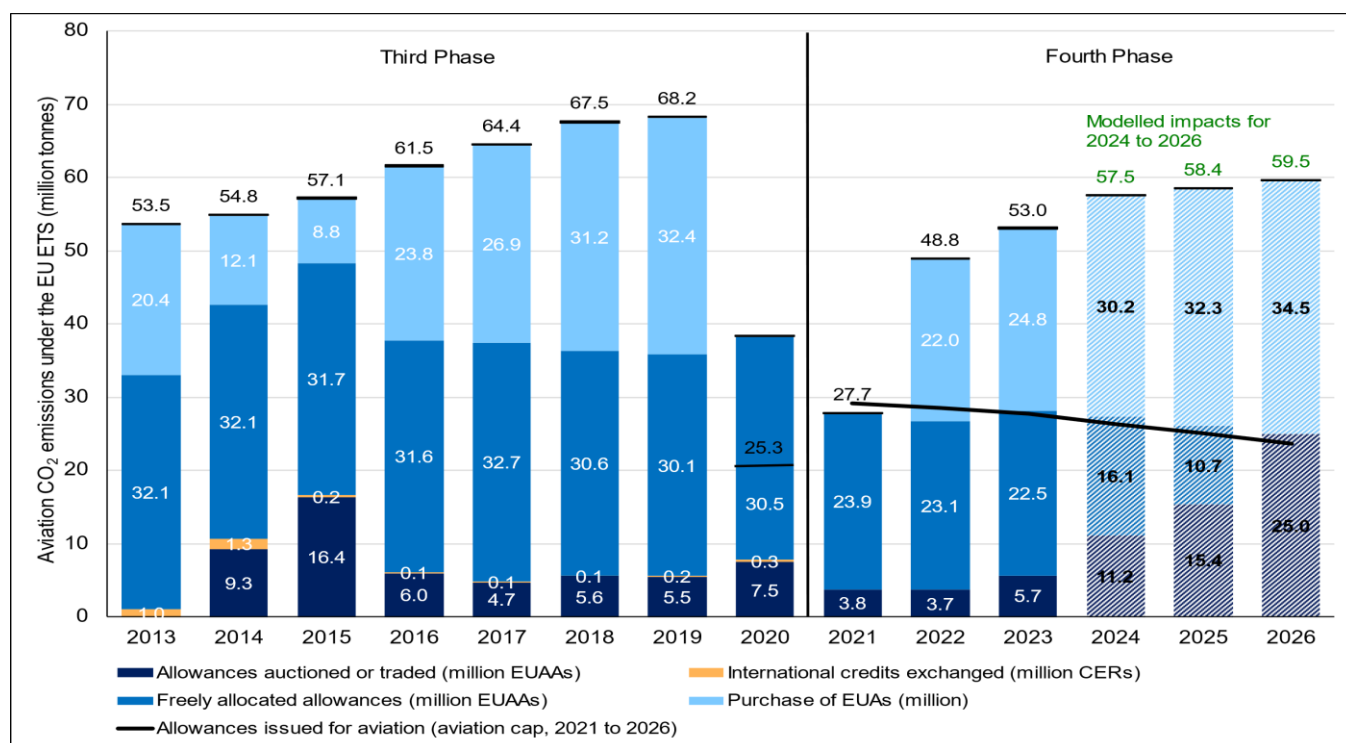
Since 2021, a gradual recovery of aviation activities has been observed: total verified aviation CO<sub>2</sub> emissions covered by the EU ETS in 2021, 2022 and 2023 were 27.7Mt, 48.8Mt and 53.0Mt respectively. The free allowances allocated to the aviation sector were 23.9Mt in 2021, 23.1Mt in 2022 and 22.5Mt in 2023. Following the rebound of aviation sector's CO<sub>2</sub> emissions from the COVID-19 pandemic, the sector became a net purchaser of EUAs again in 2022 (22.0Mt) and in 2023 (24.8Mt). From 2021 until 2023, a linear reduction factor of 2.2% has been applied to the Allowances issued for aviation, and this factor will increase to 4.3% for the period of 2024-2027.

As also shown in Figure 4.1, the modelled CO<sub>2</sub> emissions under the aviation ETS are expected to grow to 59.5Mt in 2026. In line with the gradual phase out of the free allowances to the aviation sector, the annual amount of freely allocated EUAs for aviation is expected to reduce from 16.1 Mt in 2024 to 10.7Mt in 2025 and then become zero from 2026 onwards. Purchase of EUAs is expected to grow from 27.1Mt in 2024 to 28.7Mt in 2026. Emissions benefits from the claiming of Sustainable Aviation Fuels (SAF) could grow from 0.5Mt in 2024 to 1.7Mt in 2026, assuming a zero emissions factor of SAF as per the EU ETS Directive. Moreover, there could be a relative demand reduction within the aviation sector over the years 2024-2026 of 9.8Mt as a result of the carbon price incurred due to the EU ETS<sup>36</sup>.

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<sup>36</sup> Estimation from EASA AERO-MS model. See Appendix C for more details.

**Figure 4.1 Aviation** CO<sub>2</sub> emissions under the EU ETS in 2013-2023 and modelled impact of the revised ETS Directive for years 2024-2026, where 1 EUAA / EUA equals 1 tonne of CO<sub>2</sub> emissions<sup>37</sup>

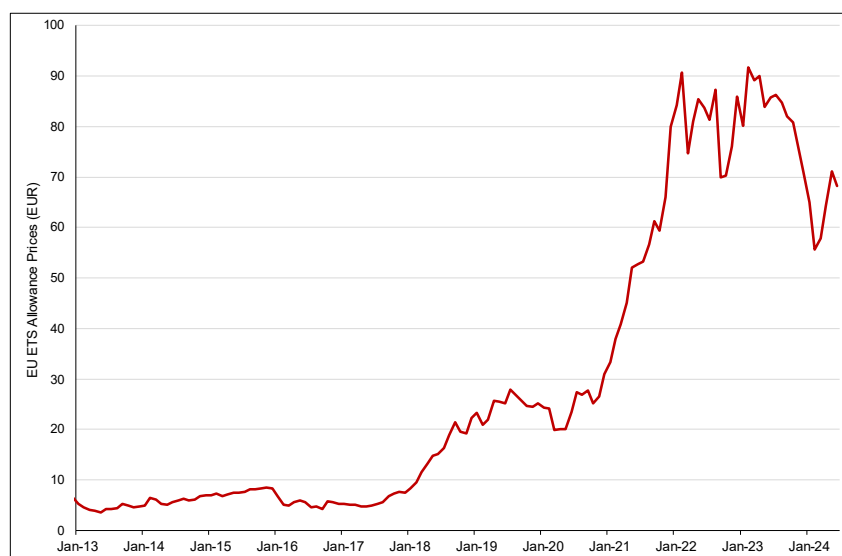


*Note: Data in Figure 4.1 reflects the years in which the EUAs were effectively released to the market. This applies especially for allowances attributable to years 2013, 2014 and 2015, which were all auctioned in 2015. The 2014 auctions of EUAs relate to auctioning of EUAs due to the postponement of 2012 auctions. Modelled data for years 2024-2026 from the updated AERO-MS model.*

As shown in Figure 4.2, the annual average EU ETS carbon price varied between €4 and €30 per tonne of CO<sub>2</sub> during the 2013-2020 period. Consequently, total aircraft operator costs linked to purchasing EU Allowances (EUAs) have gone up from around €84 million in 2013 to around €955 million in 2019. Since 2021, the EUA price has increased significantly, reaching average annual EUA prices of more than €80 in 2022 and 2023, resulting in total aircraft operator cost of approximately €1.8 billion in 2022 and €2.1 billion in 2023. Peak EUA prices exceeding €90 per tonne of CO<sub>2</sub> were observed in early 2022 and again in 2023. For the period of 2024-2026, it is estimated that the ETS cost could represent 4-6% of airlines' total annual operating costs<sup>38</sup>.

<sup>37</sup> In addition, the Swiss ETS is forecast to result in a purchase of ETS allowances by aviation sector as follows: 0.3 million in 2023; 0.4 million in 2024; 0.5 million in 2025 and 0.6 million in 2026.

<sup>38</sup> Estimation from EASA AERO-MS model.

**Figure 4.2** EU ETS Allowance Prices (2013-2024)

From 2024 until 2030, airlines can apply for additional ETS allowances to cover part or all of the price differential between the use of fossil kerosene and SAF on their flights covered by the EU ETS. A maximum amount of 20 million allowances will be reserved for such a support mechanism, and airlines can apply for an allocation on an annual basis. The Commission will calculate the price differentials annually, taking into account information provided within the annual ReFuelEU Aviation report from EASA.

### European Model for Impact Assessments of Market-based Measures

The EASA AERO Modelling System (AERO-MS) has been developed to assess the economic and environmental impacts of a wide range of policy options to reduce international and domestic aviation GHG emissions. These policies include taxes (e.g. fuel and ticket taxation), market-based measures (e.g. EU ETS, CORSIA), as well as the introduction of sustainable aviation fuels and air traffic management improvements. The model can provide insight into the effect of policy options on both the supply side and demand side of air travel due to higher prices, and the forecasted impact on emission reductions.



During the last 20 years, the AERO-MS has been a key part of more than 40 international studies where the model results have informed policy discussions and decisions. Beneficiaries of the AERO-MS include a wide range of organizations, including the European Commission, Member States, EASA, IATA, ICAO, aviation industry and NGOs. As a part of a project funded by the EU Horizon 2020 research programme, an update to AERO-MS was completed in 2024 to enhance its capabilities for future studies. This included a new base year of 2019 traffic and emissions, latest information on price elasticities, the addition of particulate matter emissions modelling and the inclusion of the impacts of SAF.

Modelling results from AERO-MS have been used as input for various Figures included within this Chapter.

## 4.2 CARBON OFFSETTING AND REDUCTION SCHEME FOR INTERNATIONAL AVIATION (CORSIA)

### Background

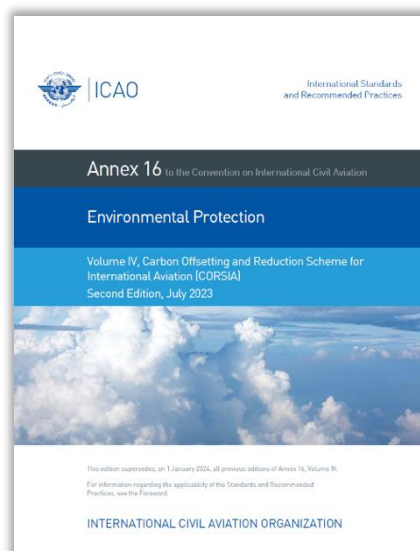
In 2016, the 39<sup>th</sup> ICAO General Assembly reconfirmed the 2013 aspirational objective of stabilising CO<sub>2</sub> emissions from international aviation at 2020 levels. In light of this, ICAO States adopted Resolution A39-3 which introduced a global market-based measure called the 'Carbon Offsetting and Reduction Scheme for International Aviation' (CORSIA). ICAO Assembly Resolutions are reassessed every three years, and the current Resolution A41-22 for CORSIA implementation was adopted by the 41<sup>st</sup> ICAO Assembly in 2022, following the outcome of the first CORSIA periodic review by the ICAO Council [3].



CORSIA is being implemented through the associated ICAO Standards and Recommended Practices (SARPs) contained in ICAO Annex 16, Volume IV, the 1<sup>st</sup> Edition of which became applicable on 1 January 2019. In March 2023, the 2<sup>nd</sup> Edition of Volume IV was approved by the Council and became applicable 1 January 2024. There were two main sources for the 2<sup>nd</sup> Edition updates: technical amendments arising from the 12<sup>th</sup> meeting of ICAO's Committee on Aviation Environmental Protection (CAEP) in February 2022, and consequential amendments to reflect the outcome of the 41 ICAO Assembly in October 2022.

### 12<sup>th</sup> ICAO CAEP Meeting

- Clarification on technical matters related to monitoring, reporting and verification provisions.
- Definition of an offsetting threshold of 3,000 tonnes of offsetting requirements per 3-year compliance cycle for aeroplane operators with low levels of international aviation activity.
- Clarification on the calculation of offsetting requirements for new aeroplane operators that do not qualify as new entrants.
- Alignment of verification-related contents with the latest applicable editions of International Organization for Standardization (ISO) documents referenced in Annex 16, Volume IV.



### 41<sup>st</sup> ICAO Assembly

- Use 2019 emissions as CORSIA's baseline emissions for the pilot phase years in 2021-2023; and 85% of 2019 emissions after the pilot phase in 2024-2035.
- Decision on the share of individual/sectoral growth factors: 100% sectoral growth factor until 2032; 85% sectoral / 15% individual growth factor in 2033-2035.
- Use of 2019 emissions for the determination of the new entrant operators threshold.

The SARPs are supported by guidance material included in the Environmental Technical Manual (Doc 9501), Volume IV and so called "Implementation Elements", which are directly referenced in the SARPs [4]. ICAO Member States are required to amend their national regulations in line with the amended SARPs, if necessary.

#### **Europe's participation in CORSIA**

In line with the 'Bratislava Declaration' signed on 3 September 2016, and following the adoption of the CORSIA SARPs by the ICAO Council, EU Member States and the other Member States of the European Civil Aviation Conference (ECAC) notified ICAO of their intention to voluntarily participate to CORSIA offsetting from the start of the pilot phase in 2021, provided that certain conditions were met, notably on the environmental integrity of the scheme and global participation. EU member states have implemented CORSIA's MRV provisions since 2019 and, as per the revised EU ETS Directive, are implementing CORSIA's offsetting requirements since 2021 for routes between the European Economic Area (EEA) and States that are participating in CORSIA offsetting, as well as for flights between two such States<sup>39</sup>. Implementation of CORSIA's monitoring, reporting and verification rules within the EU has been through the relevant ETS Regulations [5, 6, 7].

### **CORSIA scope and timeline**

CORSIA operates on a route-based approach and applies to international flights, i.e. flights between two ICAO States. A route is covered by CORSIA offsetting requirements if both the State of departure and the State of destination are participating in the Scheme and is applicable to all aeroplane operators on the route (i.e. regardless of the administering State).

All aeroplane operators with international flights producing annual CO<sub>2</sub> emissions greater than 10, CO<sub>2</sub> emissions covered by CORSIA's offsetting requirements above 000 tonnes from aeroplanes with a maximum take-off mass greater than 5700 kg, are required to monitor, verify and report their CO<sub>2</sub> emissions on an annual basis from 2019. The CO<sub>2</sub> emissions reported for year 2019 represent the baseline for carbon neutral growth for CORSIA's pilot phase (2021-2023), while for the first and second phases in 2024-2035, the baseline is 85%

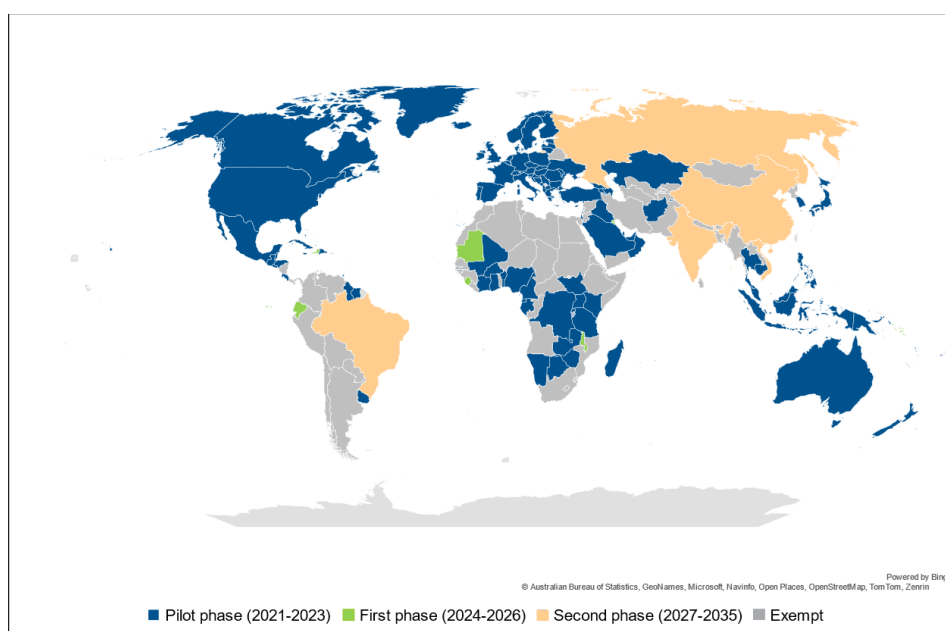
<sup>39</sup> As per the ETS Directive, EU ETS is being applied for flights within and between countries in the European Economic Area, as well as departing flights to Switzerland and to the United Kingdom.

of the CO<sub>2</sub> emissions reported for year 2019. The aviation sector is required to offset any international these baseline levels.

CORSIA includes three implementation phases. During the pilot and first phases, offsetting requirements will only be applicable to flights between States which have volunteered to participate in CORSIA offsetting. There has been a gradual increase of States volunteering to join CORSIA offsetting, rising from 88 States in 2021 to 129 in 2025 [8]. The second phase applies to all ICAO Contracting States, with certain exemptions.

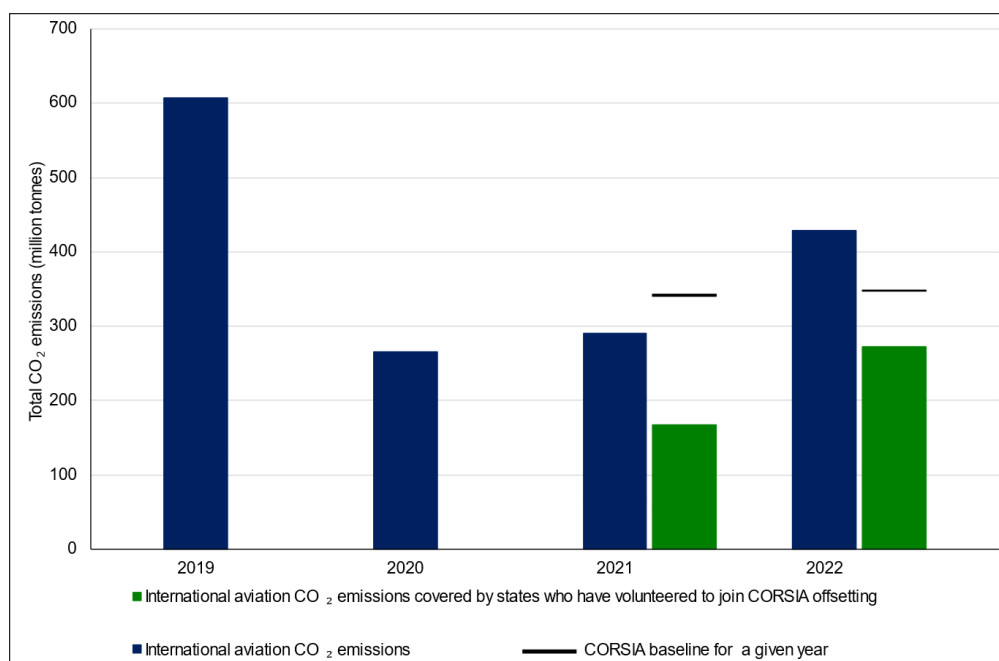


**Figure 4.3 ICAO Member States participation in CORSIA offsetting in various phases**



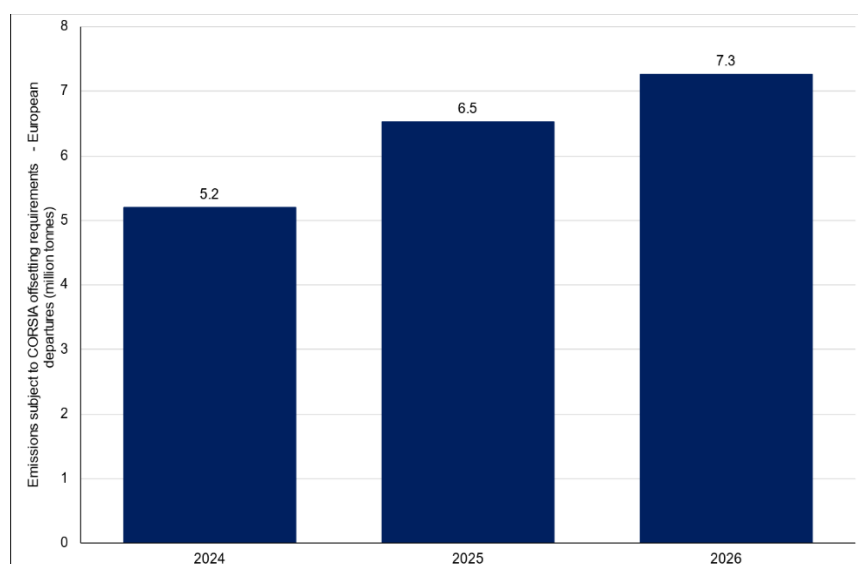
Due to the change in CORSIA baseline to 2019 emissions for years 2021-2023, and the fact that international aviation emissions covered by routes between two States that have volunteered to join CORSIA offsetting have not reached 2019 levels by 2023, there has not been any offsetting requirements to airlines from CORSIA during its pilot phase. Figure 4.4 illustrates the reported CO<sub>2</sub> emissions from all international flights (blue bars) and a subset of these emissions (green bars) between States that have volunteered to join CORSIA offsetting in respective years. For years 2021-2023, CORSIA's baseline emissions are the total CO<sub>2</sub> emissions covered by CORSIA offsetting in 2019. This baseline emissions will be recalculated for every given year, based on the routes covered by CORSIA offsetting requirements in that given year.

**Figure 4.4 International aviation CO<sub>2</sub> emissions reported through the CORSIA Central Registry**



The revised EU ETS will be applied to flights within and between countries in the European Economic Area, as well as departing flights to Switzerland and to the United Kingdom, while applying CORSIA offsetting for flights to, from and between third countries that participate in CORSIA offsetting. It is estimated that the offsetting requirements for flights departing from Europe will increase from 5.2 tonnes in 2024 to 7.3 tonnes in 2026<sup>40</sup> (Figure 4.5).

**Figure 4.5 Estimated CORSIA offsetting requirements for departing flights from Europe<sup>41</sup>**



<sup>40</sup> Estimation by EASA AERO-MS model.

<sup>41</sup> Covers departing traffic for all airlines from EEA countries and Switzerland to third countries that participate in CORSIA offsetting, except for flights to the United Kingdom, which are covered by EU and CH ETS.



## CORSIA in practice

International flights within the scope of CORSIA are attributed to an aeroplane operator, and each operator is attributed to an administrating State to which it must submit an Emissions Monitoring Plan. Since 1 January 2019, an aeroplane operator is required to report its annual CO<sub>2</sub> emissions to the State to which it has been attributed, irrespective of whether it has offsetting obligations. As of 1 January 2021, the State calculates annual offsetting requirements for each operator that has been attributed to it by multiplying the operator's CO<sub>2</sub> emissions covered by CORSIA offsetting obligations with a Growth Factor. For years 2021-2032, the Growth Factor represents the percentage growth of the aviation sector's international CO<sub>2</sub> emissions covered by CORSIA's offsetting requirements in a given year compared to the sector's baseline emissions. For the period of 2033-2035, the Growth Factor is calculated by using 85% of the sector's growth against the baseline and 15% of individual aeroplane operator's growth against the baseline.

At the end of each 3-year compliance period (2021-2023, 2024-2026, etc.), an aeroplane operator must meet its offsetting requirements by purchasing and cancelling certified CORSIA eligible emissions units. Each emissions unit represents a tonne of CO<sub>2</sub> avoided or reduced. In order to safeguard the environmental integrity of offset credits used under CORSIA, the emission units must comply with the Emission Unit Criteria approved by the ICAO Council. The price of a CORSIA eligible emissions unit has varied greatly depending on the type of the project (\$0.50 to \$45/tCO<sub>2</sub>e during 2020-2021 with a weighted average of \$3.08/tCO<sub>2</sub>eq in 2021) [9]. For the period 2024-2026, it is estimated that the cost of purchasing CORSIA offset credits could be limited at 0.07-0.15% of the total annual operating costs for airlines. Aeroplane operators can also reduce their offsetting requirements by using CORSIA eligible fuels (CEF) that meet the CORSIA sustainability criteria, which includes at least 10% less CO<sub>2</sub>e emissions on a life-cycle basis compared to a reference fossil fuel value of 89.1gCO<sub>2</sub>e/MJ.

ICAO has established a Technical Advisory Body (TAB) to undertake the assessment of Emissions Unit Programmes against the approved Emissions Units Criteria, and to make annual recommendations on their use within CORSIA. To date, based on the TAB's recommendations, the ICAO Council has approved 11-emissions unit programmes to supply CORSIA Eligible Emissions Units for CORSIA's pilot phase in 2021-2023, and two programmes to supply Units for the first phase in 2024-2026 [10].

In addition to avoidance and reduction projects, removal projects that are designed to remove carbon from the atmosphere can include both natural (e.g., planting trees) and technological carbon removal processes (e.g. Direct Air Capture – DAC or Direct Air Carbon Capture and Storage – DACCS) and have a potential to produce high-quality carbon offsets in the future. Carbon capture and storage technologies can also potentially be utilized for the production of sustainable aviation fuels. The EU has put forward a carbon removal certification framework [11], which aims to scale up carbon removal activities by empowering businesses to show their action in this field. Such certified removals can potentially become eligible in schemes such as CORSIA or when offsetting internal aviation emissions.

In order to address concerns on double counting, rules for international carbon markets under Article 6 of the Paris Agreement were adopted at the UN COP26 meeting in 2021.

These rules require a host country to authorize carbon credits for 'international mitigation purposes', such as CORSIA, and to ensure that these emission reductions are not used to achieve its National Determined Contribution (NDC) under the UNFCCC process. These rules are designed to guarantee that corresponding adjustments take place prior to these emission reductions being used to demonstrate compliance with CORSIA. First announcements of authorizations of carbon credits for CORSIA compliance purposes have been observed in early 2024 [12].

### What are the differences and similarities between the EU ETS and CORSIA?

The EU ETS is a **cap-and-trade** system, which sets a limit on the number of emissions allowances issued, and thereby constrains the total amount of emissions of the sectors covered by the system. In the EU ETS, these comprise operators of stationary installations (e.g. heat, power, industry), maritime transport operators and aircraft operators. The total sum for aviation allowances in the EU ETS is 95% of the average emissions between 2004 and 2006, adjusted for the applicability scope and reduced by the linear reduction factor annually. The total number of emissions allowances is limited and reduced over time, thereby driving operators in need of additional allowances to buy these on the market from other sectors in the system – hence 'cap-and-trade'. This ensures that the objective of an **absolute decrease of the level of CO<sub>2</sub> emissions** is met at the system level. The revised EU ETS Directive is expected to lead to emission reductions of 61% in 2030 compared to 2005 levels for the sectors covered by the Directive. The supply and demand for allowances establishes their price under the ETS, and the higher the price, the higher the incentive to reduce emissions in order to avoid having to purchase more allowances. Aircraft operators can also use Sustainable Aviation Fuels to comply with their ETS obligations.

The ICAO CORSIA is an **offsetting** scheme with an objective of carbon neutral growth designed to ensure that CO<sub>2</sub> emissions from international aviation do not exceed 2019 levels in 2021-2023 and 85% of 2019 levels in 2024-2035. To that end, aeroplane operators will be required to purchase **offset credits** to compensate for emissions above the CORSIA baseline or use CORSIA Eligible Fuels. The observed spread of the cost of CORSIA eligible emission units has been high and dependent on the project category.

EU ETS allowances are not accepted under CORSIA, and international offset credits, including those deemed eligible under CORSIA, are not accepted under the EU ETS as of 1 January 2021.

Both the EU ETS and CORSIA include similar **Monitoring, Reporting and Verification (MRV) systems**, which are aimed to ensure that the CO<sub>2</sub> emissions information collected through the scheme is robust and reliable. The MRV system consists of three main components: first, an airline is required to draft an Emissions Monitoring Plan, which needs to be approved by a relevant Competent Authority. After the Plan has been approved, the airline will **monitor** its CO<sub>2</sub> emissions either through a fuel burn monitoring method or an estimation tool. The necessary CO<sub>2</sub> information will be compiled on an annual basis and **reported**

from airlines to their Competent Authorities by using harmonised templates. A third-party **verification** of CO<sub>2</sub> emissions information ensures that the reported data is accurate and free of errors. A verifier must be independent from the airline, follow international standards in their work and be accredited to the task by a National Accreditation Body.

### 4.3 Sustainable Finance and Energy Taxation Initiatives

In addition to the EU ETS and CORSIA, there are recent regulatory developments in the area of sustainable finance and energy taxation that are relevant for the aviation sector, notably the introduction of aviation-related activities under the EU Taxonomy system, as well as proposal to introduce minimum rates of fuel taxation for intra-EU passenger flights.

#### EU Taxonomy

In order to direct investments towards sustainable products and activities, the EU has introduced a classification system, or “EU Taxonomy”. This EU Taxonomy is expected to play a crucial role in scaling up sustainable investment and implementing the EU Green Deal by providing companies, investors and policymakers with definitions of which economic activities can be considered as environmentally sustainable. Under the Taxonomy Regulation [13], “Technical Screening Criteria (TSC)” have been developed for economic activities in various sectors. These TSC determine the conditions under which an economic activity qualifies as Taxonomy aligned and should be reviewed on a regular basis, and at least every 3 years.

On 9 December 2021, a first delegated act on sustainable activities for climate change mitigation and adaptation objectives of the EU Taxonomy (“Climate Delegated Act”) was published in the Official Journal [14]. It included the activity on low carbon airport infrastructure as well as on manufacture of hydrogen and hydrogen-based synthetic fuels.

The Climate Delegated Act [15] was amended in 2023 to include the following additional aviation-related activities: manufacturing of aircraft, leasing of aircraft, passenger and freight air transport and air transport ground handling operations.

The new TSC focus on incentivising the development and market introduction of aircraft with zero direct (tailpipe) CO<sub>2</sub> emissions, and best-in-class aircraft (See Figure 7.6 presenting a part of the Technical Screening Criteria for “best in class” aircraft). In addition, and as transitional activities, the TSC also incentivise the manufacturing and uptake of the latest generation aircraft that replace older, less fuel-efficient models without contributing to fleet expansion. The latest generation aircraft are identified by referring to a certain margin to the ICAO New Type Aeroplane CO<sub>2</sub> standard, several other requirements and ‘do no significant harm’ (DNSH) criteria, including on emissions and noise. In addition, the TSC also puts a strong emphasis on the replacement of fossil jet fuel with Sustainable Aviation Fuels (SAF) and the technical readiness of the aircraft fleet to operate with 100% SAF.

#### EU Energy Taxation Directive

Aviation fuel, other than in private pleasure-flying, is currently exempted from taxation under the EU Energy Taxation Directive. EU Member States could tax fuel used for domestic flights or for intra-EU transport if agreed between the Member States concerned on a bilateral basis, although none currently do so. As part of the 'Fit for 55' Legislative Package, the European Commission has proposed to introduce minimum rates of taxation for intra-EU passenger flights that would encourage a switch to sustainable fuels as well as more fuel-efficient aircraft [16]. According to the proposal, the tax for aviation fuel would be introduced gradually over a period of 10 years before reaching the final minimum rate of €10.75/GJ (approximately €0.38 per litre). In comparison, sustainable aviation fuels would incur a zero-tax rate during this same period and after that benefit from a lower minimum tax rate. No agreement on a final Directive has been achieved to date.

### **Voluntary Offsetting**

In recent years, some airlines have introduced voluntary offsetting initiatives aimed at compensating, partly or in full, those CO<sub>2</sub> emissions caused by their operations that are not mitigated by other measures. Such voluntary initiatives have the potential to contribute to a more sustainable aviation sector, assuming that investments are channelled to high quality offset credits that meet certain quality criteria, e.g. are additional<sup>42</sup>. However, there has been some criticism of the quality of offset credits in this unregulated voluntary market, as well as scepticism of such voluntary activity enhancing aviation sustainability [17, 18, 19].

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<sup>42</sup> "Additionality" means that the carbon offset credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario. [20]

## STAKEHOLDER ACTIONS

### Airbus Carbon Capture Offer (ACCO)

Airbus developed ACCO with the aim to bring to the aviation industry high-environmental integrity, scalable and affordable carbon dioxide removal credits. [21]. ACCO looks to support the management of the remaining and residual CO<sub>2</sub> emissions of aircraft with the latest carbon removal technologies.



As a first step, Airbus partnered with 1PointFive for exploring direct air carbon capture and storage solutions for the aviation industry. In particular, 1PointFive is developing a large-scale facility expected to capture 0.5 million tonnes of CO<sub>2</sub> per year starting in 2025. Airbus has committed to purchase 400,000 tonnes of CO<sub>2</sub> removals. This initiative aims to support efforts for decarbonising and mitigating Airbus' Scope 3 emissions from the use of its sold product, and also contributes to the larger efforts already underway across the aviation industry.

## List of resources

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- [2] EU (2023), Directive (EU) 2023/958 of the European Parliament and of the Council of 10 May 2023 amending Directive 2003/87/EC as regards aviation's contribution to the Union's economy-wide emission reduction target and the appropriate implementation of a global market-based measure.
- [3] ICAO (2022), Resolution A41-22: Consolidated statement of continuing ICAO policies and practices related to environmental protection — CORSIA.
- [4] ICAO (2024), ICAO CORSIA Implementation Elements: CORSIA Implementation Elements (icao.int)
- [5] EU (2024), Implementing Regulation (EU) 2018/2066 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC and amending Commission Regulation (EU) No 601/2012.
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- [7] EU (2019), Commission Delegated Regulation (EU) 2019/1603 supplementing Directive 2003/87/EC of the European Parliament and of the Council as regards measures adopted by the International Civil Aviation Organisation for the monitoring, reporting and verification of aviation emissions for the purpose of implementing a global market-based measure.
- [8] ICAO (2024), CORSIA States for Chapter 3 State Pairs.
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- [10] ICAO (2024), CORSIA Eligible Emissions Units.
- [11] EC (2022), Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a Union certification framework for carbon removals.
- [12] Government of Guyana (2024), World's First Carbon Credits for Use in UN Airline Compliance Programme, CORSIA.
- [13] EU (2020), Regulation (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.
- [14] EU (2021), Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.
- [15] EU (2023), Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as

contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

- [16] EC (2021), Proposal for a COUNCIL DIRECTIVE restructuring the Union framework for the taxation of energy products and electricity.
- [17] Bloomberg (2024), Inside the Controversy That's Divided the Carbon Offsets Market - BNN Bloomberg.
- [18] Washington Post (2023), Airlines want you to buy carbon offsets. Experts say they're a 'scam.' - The Washington Post.
- [19] De Mello, Fabiana Peixoto (2024), Voluntary carbon offset programs in aviation: A systematic literature review, Transport Policy, Volume 147, Pages 158-168.
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- [21] Airbus (2024), Airbus Carbon Capture Offer.





## **5. ADDITIONAL MEASURES**

- Significant airport initiatives are being taken forward to invest in onsite production of renewable energy to electrify ground support equipment, thereby mitigating noise and emissions.
- Airport infrastructure will need to be adapted to accommodate SAF and zero emissions aircraft (electric, hydrogen) to meet ReFuelEU Aviation requirements. Various research projects and funding mechanisms are leading the way.
- Some airports are supporting the uptake of SAF through investment in production, supply chain involvement, raising awareness, financial incentives and policy engagement.
- 132 airports in Europe have announced a net zero CO<sub>2</sub> emissions target by 2030 or earlier, and 13 airports have already achieved it.
- In 2023, a new Level 5 was added to the Airport Carbon Accreditation programme requiring 90% CO<sub>2</sub> emissions reductions in Scopes 1 and 2, a verified carbon footprint and a Stakeholder Partnership Plan underpinning the commitment of net zero CO<sub>2</sub> emissions in Scope 3.
- Global environmental challenges require global cooperation to achieve agreed future goals.
- International Cooperation is a key element to reach the global objective of net-zero CO<sub>2</sub> emissions by 2050 including the aim to achieve a 5% reduction of CO<sub>2</sub> emissions from the use of Sustainable Aviation Fuels (SAF), Low Carbon Aviation Fuels and other aviation cleaner energies by 2030.
- Since 2022, EU entities (e.g. States, Institutions and Stakeholders) have committed more than €20M to support environmental protection initiatives in civil aviation across Africa, Asia, Latin America and the Caribbean.
- Collaboration with Partner States has contributed to the sound implementation of CORSIA-Monitoring Reporting and Verification in more than 100 States and facilitated new States joining its voluntary pilot and first phases.
- Technical support contributed to the development of a first or updated State Action Plan for CO<sub>2</sub> emissions reduction within 18 States, and to an enhanced understanding of SAF and the associated opportunities worldwide.
- Future efforts with Partner States in Africa, Asia, Latin America and the Caribbean are expected to focus on the implementation of CORSIA offsetting and building capacity to increase SAF production.
- SAF, which has the biggest potential to significantly reduce the carbon footprint of air transport in the short- and long-term, are also an opportunity for States to develop their green economy and to boost job creation. Hence, initiatives like the EU Global Gateway are providing financial support (initially on feasibility studies) to help realise viable SAF production projects in Partner States.
- Awareness, coordination, and collaboration in International Cooperation initiatives among supporting partners are essential factors to maximise the value of the resources provided to Partner States.
- The Aviation Environmental Protection Coordination Group (AEPCG) provides a forum to facilitate this coordination of European action with Partner States.

## 5.1 Airport Measures

### 5.1.1 Aircraft Operations

#### Performance Based Navigation (PBN)

The use of Performance Based Navigation (PBN) enables an optimum aircraft flight path trajectory to mitigate environmental impacts, particularly in the vicinity of airports, without having to overfly ground-based navigation aids. Implementation of the PBN Regulation [15] has shown a positive trend since the last report. As of July 2024, 75% of instrument runways are now fully compliant with the requirements and the implementation of PBN has respectively started for 81% Standard Instrument Departures (SIDs) and 82% Standard Terminal Approach Routes (STAR) at these runways. Completion is due by 2030.

The implementation of the PBN Regulation is expected to result in a number of environmental benefits, although neither their evaluation nor their quantification is mandated. As such, it has proven challenging to identify relevant data for this report. Stakeholders responsible for putting in place the required PBN routes and procedures are encouraged to optimise airspace design and the potential environmental benefits, in particular for flight efficiency and route placement flexibility.

#### Green Operational Procedures

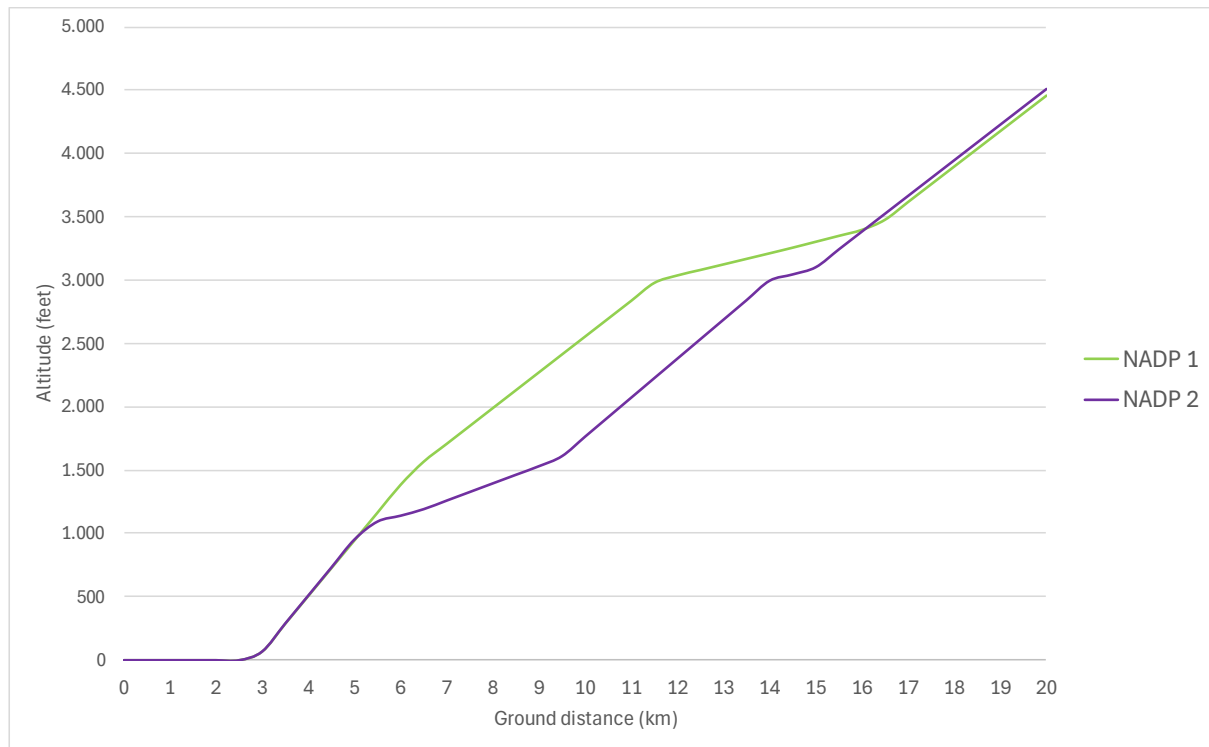


Building on the previous ALBATROSS research project [16], the goal of the SESAR project HERON launched in 2023 is to reduce the environmental impact from aviation through the deployment of already-mature solutions that range from more efficient aircraft operations to optimised management of air traffic during flights [17]. This includes the Green Apron Management demonstration, which uses sensors and artificial intelligence for more predictable and efficient aircraft handling during airport stopovers.

#### Noise Abatement Departure Procedures (NADPs)

NADPs aim to reduce the noise impact of departing aircraft by selecting the appropriate moment to clean the aircraft (i.e. retract flaps), which has an impact on the flown vertical profile. NADP1 results in noise reductions close to the airport, while NADP2 reduces noise further away and has lower fuel consumption (Figure 5.1). Depending on the operational context (aircraft type, take-off weight, weather, etc) and on the location of the noise sensitive areas, the best balance between noise and emission reductions needs to be determined.

**Figure 5.1** Example of the difference between NADP 1 and 2 for a wide body aircraft with thrust reduction at 1,000ft.



A study performed by EUROCONTROL highlighted that in many cases a fixed NADP procedure for all aircraft types and runways is advised or mandated by the airport authorities, but that this is not always the optimal solution to balance noise and emission reductions. Noise sensitive areas vary from airport to airport, and from departure runway to runway. As such, airports should identify key noise sensitive areas in each Standard Instrument Departure procedure. By taking the local operational context into consideration and allowing the flight crew to determine the best NADP, additional noise or emission reductions could be achieved.

The study concluded that in some cases where NADP1 procedures are applied, using NADP2 procedures could reduce fuel burn by 50kg to 200kg while only marginally increasing noise by 1dB close to the airport.

### Sustainable Taxiing

Trials linked to sustainable taxiing are ongoing at various airports (e.g. Amsterdam Schiphol, Eindhoven, Paris Charles-de-Gaulle and Brussels) through various SESAR research projects as well as national projects. To incentivise implementation and to synchronize developments, a EUROCONTROL / ACI-EUROPE Sustainable Taxiing Taskforce developed a Concept of Operations in 2024 [18].



The Concept of Operations (CONOPS) addresses the potential fuel burn reductions of several sustainable taxiing solutions, which could be up to 400kg CO<sub>2</sub> from a single aisle aircraft taxi-out phase. In addition, there are noise and air quality benefits as the aircraft engine start-up and shut-down procedures occur away from the gate area.

These benefits are mainly the result of operational improvements, such as single engine taxiing, combining engine start-up while taxiing, or combining pushback and taxi clearances by air traffic control, thereby reducing total taxi and engine running times that still

take into consideration engine thermal stabilization and some additional complexity in ground operations. Research is also looking into limiting Auxiliary Power Units (APU) use to outside certain temperature above a certain threshold. On-going trials are expected to further clarify how to integrate the different taxi operational solutions and quantify their benefits by end of 2025.

### 5.1.2 Airport Infrastructure

Various EU research projects, including TULIPS [19], OLGA [20] and STARGATE [21], are currently demonstrating innovative environmental solutions at airports, which can be replicated on a European scale.

#### Ground Support Equipment

Sustainable ground operations at airports have received growing attention in the last few years as a way to address concerns regarding health and working conditions of airport operational staff, as well as the impact on communities in the vicinity of airports. States are already in the process of adopting more stringent regulations to address these concerns resulting in airports looking to fully electrify their ground operations [22].

To advance carbon neutrality of ground operations, Skytanking and Brussels Airport have been developing electric hydrant fuel dispensers, which deliver aviation fuel from the underground hydrant system into the aircraft. After a successful test period in 2023 during which two diesel fuel dispensers were retrofitted to run on electricity, Skytanking commissioned two custom made fully electric hydrant fuel dispenser, which were delivered in 2024 leading to a significant reduction in noise and exhaust gases, which is important for both the local environment and for the ground handling staff. As part of the same research project, DHL Express has replaced a third of its ground handling fleet (tractors, container lifts, belly loaders and pushbacks) with fully electric equivalents.





In 2024, Frankfurt Airport commissioned an expansion to its vertical photovoltaic solar energy system beside Runway 18 West in order to supply renewable energy to power electrified ground support equipment [23]. This facility has provided such encouraging results that its gradually expanded from 8.4kW to 17.4MW, and is now considered

the world's largest facility of its kind at an airport. The airport is also using charging infrastructure bidirectionally, which means it's possible to turn electric vehicles into mobile power storage units [24].

### Zero Emission Aircraft

The European Commission has established the Alliance for Zero Emission Aircraft (AZEA) to prepare the aviation ecosystem for the entry into service of hydrogen and electric aircraft (see Technology-Design chapter). This will require major investment in energy infrastructure is required to prepare for the introduction of zero-emission aircraft with electric and hydrogen propulsion. The large-scale introduction of zero-emission aircraft will be a crucial pillar in reaching net zero carbon emissions by 2050.



GOLIAT is an EU project that brings together all relevant aviation stakeholders to demonstrate small-scale liquid hydrogen aircraft ground operations at three European airports [25]. Launched in 2024, the group will support the aviation industry's adoption of liquid hydrogen (LH2) transportation and energy storage solutions by:

- Developing and demonstrating LH2 refuelling technologies scaled-up for future large aircraft;
- Demonstrating small-scale LH2 aircraft ground operations at airports;
- Developing the standardisation and certification framework for future LH2 operations; and
- Assessing the sizing and economics of the hydrogen value chains for airports.

### New airport pavement bearing strength calculation to optimise maintenance works

In order to ensure safe aircraft operations, airports need to continuously monitor the lifetime and life cycle of critical pavement infrastructure (runways, taxiways and aprons) based on the impact caused by different types of aircrafts with different weights, tyre geometry and tyre pressure. In 2024 EASA published guidance to European airports and competent



authorities that changed the Aircraft Classification Rating - Pavement Classification Rating (ACR-PCR) methodology used to calculate pavement bearing strength [26]. These changes are expected to optimise the use of pavement, reduce maintenance needs and costs and also reduce greenhouse gas emissions through a well-managed and better targeted pavement life cycle management by airports.

### Sustainable Aviation Fuels

The European policy framework for the deployment of SAF is ReFuelEU Aviation Regulation, which sets out a supply mandate for aviation fuel suppliers and an obligation on Union airports to facilitate this supply of aviation fuels containing the minimum shares of SAF to aircraft operators. European airports are also taking voluntary actions to support the uptake of SAF through various means (Table 5.1). A detailed overview of these types of SAF incentive initiatives by European airports has been compiled by ACI EUROPE [27].

**Table 5.1** Overview of airport initiatives to support the uptake of SAF

Supply Chain Investment
<ul style="list-style-type: none"> <li>• Support airlines on logistic issue to facilitate the delivery of SAF.</li> <li>• Engage in joint negotiations with SAF suppliers, carriers and other airports to develop SAF projects.</li> <li>• Invest in SAF production facilities.</li> </ul>
Raise Awareness
<ul style="list-style-type: none"> <li>• Inform passengers and corporations on opportunities to purchase SAF for their flights and/or support SAF projects to compensate for their CO<sub>2</sub> emissions.</li> </ul>
Financial Incentives
<ul style="list-style-type: none"> <li>• Provide airlines with SAF incentive programmes (e.g. cost sharing of SAF price premium, differentiated landing and take-off fees based on SAF use, free SAF storage).</li> </ul>
Policy Engagement
<ul style="list-style-type: none"> <li>• Engage with government and local stakeholders to support SAF development and financial incentives for airlines, but not through any kind of minimum shares of SAF other than those of ReFuelEU Aviation.</li> </ul>

The EU ALIGHT research project, led by Copenhagen airport, is looking into how to address the barriers to the supply and handling of SAF at major airports by improving the logistics chain in the most efficient and cost-effective manner [28].



## Greening Aviation Infrastructure

As the aviation sector evolves to address environmental challenges, this transition is being supported through Member State actions and EU support, notably the Trans-European Transport Network [29], the Alternative Fuels Infrastructure Regulation [30] and their 'financial arm' in the form of the Connecting Europe Facility [31].

### Trans-European Transport Network (TEN-T)

The revision of the TEN-T Guidelines [32] introduces requirements on Member States that include the improvement of airport connections to the trans-European railway network, air traffic management infrastructure to enhance the performance and sustainability of the Single European Sky, alternative fuels infrastructure and pre-conditioned air supply to stationary aircraft.

### Alternative Fuels Infrastructure Regulation (AFIR)

The AFIR introduces mandatory targets for Member States on the provision of electricity to stationary aircraft at TEN-T network airports and requires Member States to define national strategies on deployment of ground infrastructure for electric and hydrogen aircraft.

### Connecting Europe Facility (CEF)

Under CEF Transport Alternative Fuel Infrastructure Facility, 20 projects representing 63 airports from across the EU were selected since 2021, with a total EU Grant support exceeding €160 million [33, 34]. The support has been directed to electricity and pre-conditioned air supply to stationary aircraft, electric charging of ground support equipment, electricity grid connections and green electricity generation.

## 5.2 Net Zero CO<sub>2</sub> Emissions

The ACI EUROPE Sustainability Strategy was launched in 2019 [35], which included the Net Zero Resolution that has been updated in 2024 [36]. 303 European airports have since committed to net zero<sup>43</sup> carbon emissions from airport operations within their control by 2050 and provided a roadmap detailing how this will be achieved [37].



This net zero commitment covers Scope 1 direct airport emissions and Scope 2 indirect emissions (e.g. consumption of purchased electricity, heat or steam). 132 airports have

<sup>43</sup> Net zero carbon dioxide (CO<sub>2</sub>) emissions are achieved when CO<sub>2</sub> emissions from human activities are balanced globally by CO<sub>2</sub> removals from human activities over a specified period. Net zero CO<sub>2</sub> emissions are also referred to as carbon neutrality.

announced a net zero target by 2030 or earlier, and 13 airports have already achieved net zero. In 2022, guidance on reducing Scope 3 emissions from others operating at the airport which are the largest share of emissions (e.g. aircraft, surface access, staff travel) was published [38] and this was followed in 2023 with guidance on developing Net Zero carbon roadmaps [39].

## STAKEHOLDER ACTIONS

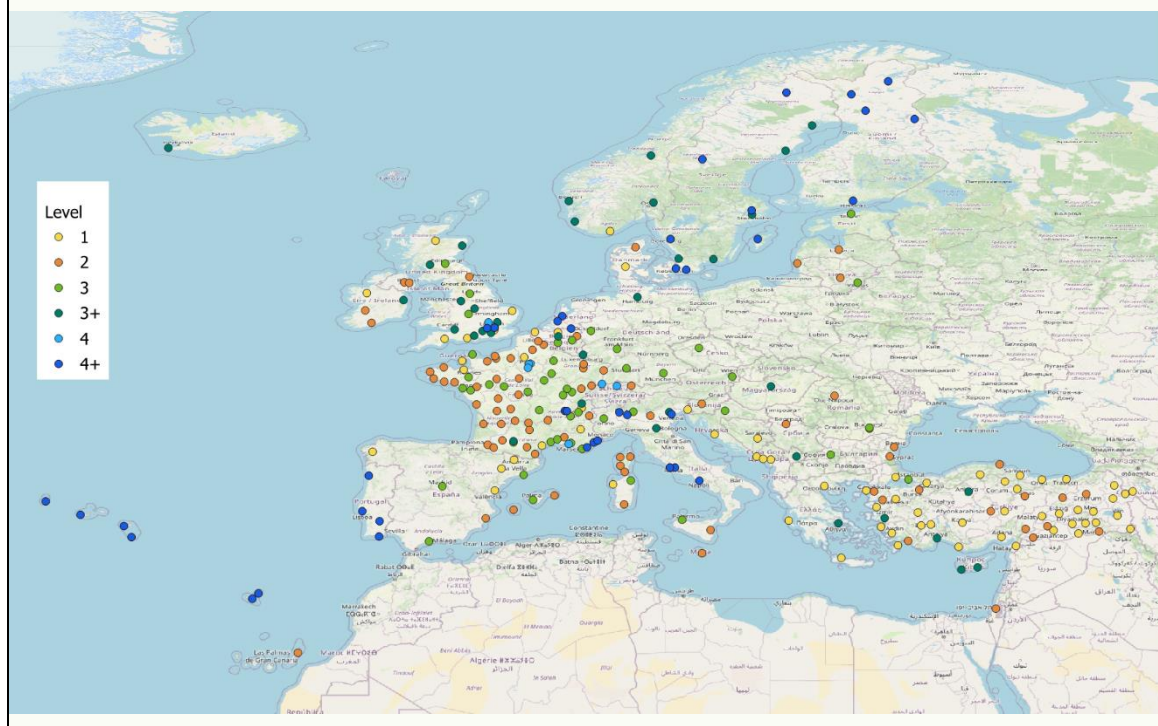
### Airport Carbon Accreditation Programme

The Airport Carbon Accreditation (ACA) programme [40] was launched in 2009 by the Airports Council International Europe and, as of 2024, now includes 564 airports on a global basis. ACA is a voluntary industry led initiative, overseen by an independent Administrator and Advisory Board, that provides a common framework for carbon management with the primary objective to encourage and enable airports to reduce their CO<sub>2</sub> emissions. All data submitted by airports is externally and independently verified. As of the latest 2022-2023 reporting period, there were **290 European airports** participating in the programme corresponding to 77.8% of European passenger traffic (Figure 5.2).



June  
The

**Figure 5.2** – European airports participating in the ACA programme



The ACA programme was initially structured around four levels of certification (Level 1: Mapping, Level 2: Reduction, Level 3: Optimisation; Level 3+: Neutrality) with increasing scope and obligations for carbon emissions management (Scope 1: direct airport emissions, Scope 2: indirect emissions under airport control from consumption of purchased electricity, heat or steam and Scope 3: emissions by others operating at the airport such as aircraft, surface access, staff travel).

In 2020, Levels 4 (Transformation<sup>44</sup>) and 4+ (Transition<sup>45</sup>) have been added as interim steps towards the long-term goal of achieving net zero CO<sub>2</sub> emissions and to align it with the objectives of the Paris Agreement. Guidelines were also published to inform airports about offsetting options, requirements and recommendations, as well as dedicated guidance on the procurement of offsets.

In 2023, a new Level 5 was added to the ACA programme. When applying for Level 5 airports are required to reach and maintain  $\geq 90\%$  absolute CO<sub>2</sub> emissions reductions in Scopes 1 and 2 in alignment with the ISO Net Zero Guidelines, as well as commit to achieving net zero CO<sub>2</sub> emissions in Scope 3 by 2050 or sooner. Any residual emissions need to be removed from the atmosphere through investment in credible carbon removal projects. To support airports in this endeavour, an update to the Airport Carbon Accreditation Offset Guidance Document [41] was published on carbon removal options and most effective removal strategies. Level 5 accredited airports need to outline detailed steps to achieve their emissions reduction targets, as part of their Carbon Management Plan.

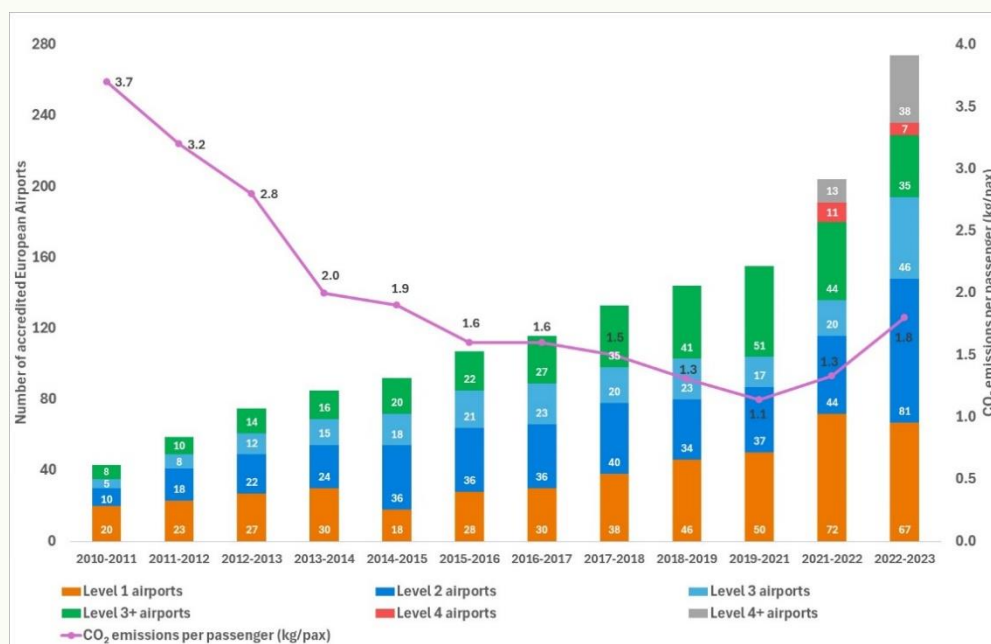
Level 5 also requires airports to submit a verified carbon footprint for Scopes 1 and 2, and all relevant categories of Scope 3 as per the requirements of the GHG Protocol Guidance [42], notably covering all significant upstream and downstream activities from third parties, including airlines. Finally, airports must establish a Stakeholder Partnership Plan underpinning their commitment to net zero CO<sub>2</sub> emissions in Scope 3, by engaging with the entire airport ecosystem and actively driving third parties towards delivering emissions reductions with regular milestone to gauge progress.

Ten airports were certified against Level 5 at launch, including 9 European airports (Amsterdam Schiphol, Eindhoven, Rotterdam-The Hague, Beja, Madeira, Ponta Delgada, Göteborg Landvetter, Malmö and Toulon-Hyères). Ivalo, Kittilä, Kuusamo and Rovaniemi airports were also subsequently accredited to Level 5 in 2024.

<sup>44</sup> Definition of a long-term carbon management strategy oriented towards absolute emissions reductions and aligned with the objectives of the Paris Agreement. Demonstration of actively driving third parties towards delivering emissions reductions.

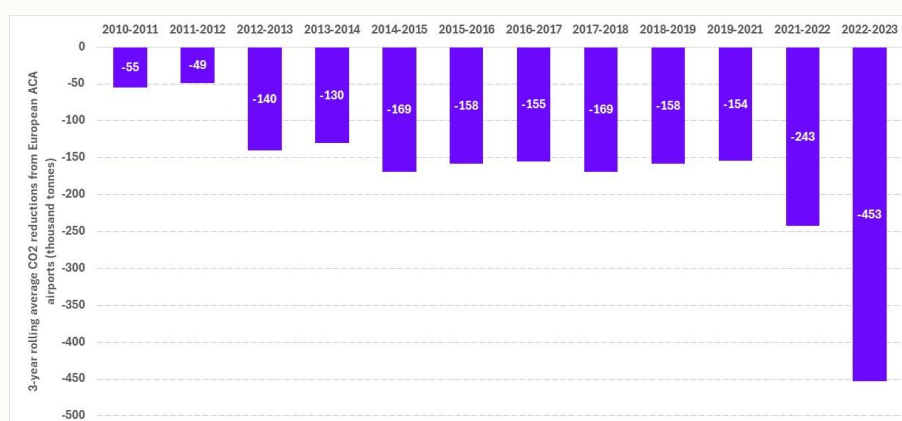
<sup>45</sup> All Levels 1 to 4 plus offsetting of the residual carbon emissions over which the airport has control.

**Figure 5.3** – Increasing number of accredited European airports and decreasing CO<sub>2</sub> emissions per passenger



The carbon emission per passenger travelling through European airports at all levels of Airport Carbon Accreditation has increased to **1.8 kg CO<sub>2</sub>/passenger** (Figure 5.4). A total reduction in Scope 1 and 2 emissions compared to a three year rolling average<sup>46</sup> of **452,893 tonnes of CO<sub>2</sub>** for all accredited airports in Europe was also reported (Figure 5.3). This represents about 20% reduction compared to the three-year rolling average.

**Figure 5.4** – Scope 1 and 2 emissions reductions in airport CO<sub>2</sub> emission



<sup>46</sup> Emissions reductions have to be demonstrated against the average historical emissions of the three years before year 0. As year 0 changes every year upon an airport's renewal/upgrade, the three years selected for the average calculation do so as well. Consequently, airports have to show emissions reductions against a three-year rolling average.

Further developments in the ACA programme are envisaged in 2025 that will focus on the efforts of airport supply chains to reduce their CO<sub>2</sub> emissions.

## STAKEHOLDER ACTIONS

### Airport Council International Europe (ACI EUROPE)

ACI EUROPE represents over 500 airports in 55 countries, which accounts for over 90% of commercial air traffic in Europe. It works to promote professional excellence and best practice amongst its members, including in the area of environmental sustainability.



### Digital Green Lane

The Digital Green Lane [43] was launched in 2023 and is a fully digital system for the delivery and collection of goods between freight forwarders and ground handlers, facilitated using cloud-based applications. This process offers numerous benefits, including shorter waiting times for the trucks that deliver and collect goods, a reduction in CO<sub>2</sub> emissions, increased transparency and less paper. The Digital Green Lane was further expanded by cargo community organisation Air Cargo Belgium and some 95% of all cargo in the Brussels Airport cargo zone is now processed via this system. A pilot programme incorporating this same system has also been launched at Athens airport.



### Airport Regions Council (ARC)

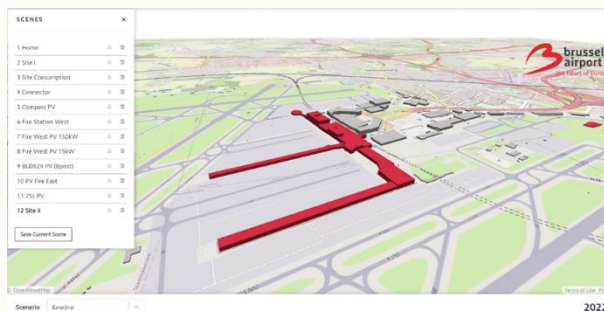
ARC is an association of local and regional authorities hosting or adjacent to both major European hub airports and smaller airports. The organisation's expertise is at the intersection of airport operations and local/regional policies, and it supports maximising benefits and minimising environmental impact, ultimately striving to improve the well-being of residents in airport regions.





## Digital Twin

Within the EU Horizon 2020 research project 'Stargate' [44], IES and Brussels Airport have developed a Digital Twin of the airport's 40 most energy-intensive buildings before modelling scenarios such as installing solar panels, electric vehicle chargers and replacing gas boilers with heat pumps to find the most effective routes to net zero carbon emissions by 2030. This marks a significant step up from the current use of digital twin technology, where it has most commonly been used to optimise commercial operations. Through rigorous modelling stages, it was verified that energy saving measures had the potential for up to 63% CO<sub>2</sub> savings against the 2019 baseline year. This approach will also be replicated at Athens, Budapest and Toulouse airports and promoted across ARC Members.



## Non-Governmental Organisations (NGOs)

Environmental NGOs are actively involved in policy-making discussions to address the environmental impacts of aviation. They communicate civil society concerns and positions associated with noise, air pollution, climate change and social justice. They also contribute to raising awareness on aviation's environmental impact through transparency of data.



## Tracking progress of business travel emissions savings



Travel Smart is a global campaign aiming at reducing corporate air travel emissions by 50% or more from 2019 levels by 2025, led by a coalition of NGOs in Europe, North America and Asia. The campaign ranks over 327 companies based on the sustainability of their business travel practices and holds them accountable through an Emissions Tracker [45]. This tool uses Carbon Disclosure Project [46] corporate emissions database and allows users to track the progress of a company's business air travel emissions reduction target.

The tracker shows through coloured bars whether companies have returned to levels of emissions above their targets or whether they have maintained reductions of -50% or more, thereby highlighting leaders and incentivising competition between companies. Through this Travel Smart campaign, various company best practices have highlighted that reducing flying is compatible with continued development of profitable business [47].

### 5.3 Areas of International Collaboration

The aviation sector has a long-standing history of making use of International Cooperation through technical cooperation programmes to grow the capabilities of States in the areas of safety, security and ATM, and EU entities are trusted and experienced partners in those initiatives.

During the last decade, the number of technical cooperation programmes dedicated to environmental protection has grown in line with the increasing ambitions of States to mitigate the environmental impact of aviation. European entities have been key contributors to this having collaborated with 112 Partner States and committed an estimated €20 million in civil aviation environmental protection projects since 2022. At global level, ICAO has developed technical capacity building programmes, such as ACT-CORSIA and ACT-SAF, which offer a common umbrella to the capacity building efforts in environment [48]. The contribution of the European Commission to these programmes amounts to €56.5 million<sup>47</sup>, including €9.6 million in projects directly implemented by ICAO. The European States and the European industry are also contributing to these ICAO programmes.

These European projects, implemented by EASA, European States, European Industry or directly by ICAO with European funds, have supported capacity building in numerous regions covering various technical topics that are summarised in this section. Building on this, there is a commitment to continue engaging through International Cooperation initiatives to pursue sustainable aviation on a global basis.

#### 5.3.1 CORSIA Implementation

The initiatives of EU entities, either through the ICAO ACT-CORSIA programme or through dedicated technical cooperation projects, have contributed to the increasing numbers of States volunteering to take part in CORSIA during the Pilot Phase (2021-2023) and First Phase (2024-2026) by facilitating the implementation of the Monitoring, Reporting and Verification (MRV) process and in some cases the development of their National accreditation process.



As described in detail within Chapter 4 on Market-Based Measures, CORSIA has now entered the First Phase (2024-2026) where, after the recovery of air traffic following the COVID-19 pandemic, the scheme is likely to lead to offsetting obligations for aeroplane operators flying between two volunteering States. CORSIA offers two ways to perform the offsetting, either by purchasing and cancelling CORSIA Emission Units (CEU) or by using CORSIA Eligible Fuels (CEF). In both cases, specific criteria and rules apply to CEU or to CEF production in order to deem them as eligible offsets. While CEU and CEF can be purchased worldwide, States are looking to benefit from the environmental and economic benefits of CORSIA by providing CEU and CEF on a domestic basis.

<sup>47</sup> Some of the projects covered environment among other activities but were not fully dedicated to environment matters.



Increasing commitments of States under the Paris Agreement through their National Determined Contributions (NDC) may result in greater competition for the use of CEU within international markets. As such, technical cooperation is also playing an important role to facilitate the understanding of the complementarity of CORSIA with other carbon markets, enabling positive synergies to maximise their intended goals and avoiding potential double-counting of emissions and emission cancellations. The cooperation between European entities and Partner States in the period 2025-2027 is expected to focus on the sound implementation of the offsetting mechanisms under CORSIA and facilitating an increase in the availability of carbon projects providing CEU.

### **Mr Jame E. Empeno**

#### **Director, Philippines Accreditation Bureau**

*"The Philippine Accreditation Board (PAB) has worked hand in hand with EASA and with the Thai Industrial Standards Institute (TISI) to develop and implement the CORSIA Accreditation Process. The combination of expertise between the three parties, sponsored by the EU-SEA CCCA CORSIA Project, has provided the necessary conditions for us to embark into this new area as an organisation, and to achieve the first accreditation of a Verification Body in the Philippines. This collaboration between PAB, EASA and TISI is an excellent example of sharing expertise and resources, thus enabling the growth of the accreditation and verification capabilities in ASEAN, which is a key area to ensure the sound and economical implementation of CORSIA within our region."*



### **5.3.2 SAF Development**

The development of Sustainable Aviation Fuels (SAF) is the most cost-effective measure and has the biggest potential to significantly reduce the carbon footprint of air transport in the short- and long-term. The carbon reduction of SAF is on a life cycle basis.

The 3<sup>rd</sup> ICAO Conference on Alternative Aviation Fuels (CAAF#3) in 2023, called as part of the efforts to achieve the LTAG, resulted in its Member States adopting the “Global Framework for Sustainable Aviation Fuels (SAF), Lower Carbon Aviation Fuels (LCAF) and other Aviation Cleaner Energies” which includes an objective to reduce the emission of air transport of 5% by 2030 thanks to SAF and other cleaner energies [49]. As part of this Framework, it was acknowledged that support to States and industry to develop and finance SAF initiatives is essential to ensure that “No Country is Left Behind” in the decarbonisation efforts. As such, the ICAO ACT-SAF Programme was established to support States in developing their full potential in SAF, through specific training activities, development of feasibility studies, and other implementation support initiatives.



A rapid and geographically balanced scaling up of SAF production requires both significant investments and well-informed decision-making. In this regard, EU entities are advocating and supporting the development of SAF within 42 Partner States in Africa, Asia and Latin America through different International Cooperation initiatives.

The first stage of this support is to raise awareness, to exchange best practices and to develop technical capabilities on SAF. The second stage involves supporting the development of local capabilities to enable local SAF production.

As part of the first stage, EU funded projects have been facilitating SAF workshops and webinars around the world and has also funded, via projects implemented by ICAO, 7 SAF Feasibility Studies - for Kenya, Trinidad and Tobago, Dominican Republic, Burkina Faso, Zimbabwe, Côte d’Ivoire and Rwanda [50, 51, 52, 53, 54, 55, 56]. Beyond Feasibility Studies, the technical cooperation initiatives from EU entities have facilitated bringing all relevant stakeholders together in order to develop a common understanding on SAF, the potential of SAF within their State and what their role could be in the development of local SAF production. This has covered the entire value chain of SAF including the different pathways for production, technoeconomic analyses, readiness studies and policy dialogues. Depending on the State profile, the support and collaboration has been tailored towards its specific potential for SAF production (e.g. analysing the activation of specific feedstocks, taking advantage of existing refining capabilities, potential use of electricity from renewable sources) and assessing at high level the technoeconomic viability of possible production pathways.

Similarly to the support provided on State Action Plans for CO<sub>2</sub> emissions, the most valuable contribution has been to facilitate a common understanding on SAF among the potential SAF actors in a State, and more crucially among different Governmental Departments (e.g. Ministries of Energy, Transport, Environment, Finance, Civil Aviation Authorities) and non-aviation stakeholders (e.g. gas and oil industry, feedstock producers).

In the framework of the EU Global Gateway strategy, EU entities have now reached the start of the second stage with the funding by the European Commission of SAF projects in 15 Partner States: Cameroun, Cote d’Ivoire, Egypt, Equatorial Guinea, Ethiopia, Kenya, India, Madagascar, Mauritania, Morocco, Mozambique, Nigeria, Rwanda, Senegal, South Africa. These projects will be implemented by ICAO and by EASA and aim to support them in achieving local SAF production projects.

The funds are being committed under the EU Global Gateway strategy and contribute to ICAO's ACT-SAF programme and other technical cooperation projects that follow a similar approach. The support initiatives are discussed and agreed with the Partner States in order to map out the main areas of potential collaboration:

- **Developing and managing the SAF programme at State level**, including the definition of the SAF Roadmap, organising the stakeholder engagement and launching communication campaigns to explain the need of SAF for decarbonisation of air transport.
- **Designing and deploying the most adequate SAF framework**, as a set of State initiatives providing favourable conditions for SAF production projects to become viable (e.g. SAF policies, financial initiatives, capacity building), starting with having a good understanding of the State's potential in the form of a feasibility study.
- **Defining viable Direct Supply Lines (SAF production and supply projects)**, assessing the technoeconomic viability of different scenarios, identifying challenges and defining actions at State level (e.g. SAF policies or regulations, incentive schemes, research on sustainability of feedstocks) or at project level (e.g. adjusting technologies, establishing partnerships, securing feedstocks) for those production projects to become viable.
- **Facilitating access to finance**, enabling the bankability of the SAF production project by derisking investment and accessing dedicated funds (e.g. Development Banks, EU Global Gateway).

The initiatives are following and contributing to the development of ICAO's ACT-SAF programme framework, templates and tools. This collaborative work is providing a common and harmonised toolkit that helps both the Partner States and relevant stakeholders match needs and supporting resources in a more agile manner, and allows for more efficient cooperation, even with multiple and concurrent partners.

This coordination is deemed essential to maximise the output of the resources dedicated to the upscale of SAF production worldwide.

**Mr Emile Arao****Director General, KCAA, Kenya**

*"SAF will be a key element in the ability of the aviation sector to increase its sustainability in mid to long-term. It is also an opportunity for countries to develop their green economy and to gain greater independence in a strategic area. However, the complexity of the product, the interdependencies with other economic sectors and the strategic decisions that are required to start producing SAF locally, requires coordination across a wide range of expertise in order for a Government to make the right decisions. The collaboration with international partners, such as the European Union, European States and Organisations, is crucial to maximise the use of available resources that can facilitate Kenya in its ambition to be one of the first countries in Africa to produce SAF at a commercial scale. Under the SAF Steering Committee, Kenya ensures an orchestrated collaboration among all partners, establishes clear leadership and milestones and allows for transparency in achieving this ambitious but exciting endeavour."*

**5.3.3 Environmental Management Systems for Airports**

As defined by ICAO, an Environmental Management System (EMS) provides a methodology and framework to systemically identify and cost-effectively manage significant environmental aspects in the operation of aviation organisations. It has been proven effective across a wide range of organisations, including airports, air carriers, manufacturers and government agencies. EMS is one of the tools available for managing environmental matters at an airport, along with sustainability plans, certifications and other processes.

Through the support from EU funded projects to the ASEAN Member States, Thailand, Laos PDR, Philippines, Indonesia and Vietnam have all developed technical capacity for the implementation of EMS in selected airports of their network. The support provided through a series of training sessions, and the exchange of experiences between airport officials, has facilitated the local implementation of the EMS and the progressive transformation of airport infrastructure to reduce its environmental impact.

As an example, Iloilo Airport in the Philippines was supported in developing and implementing their EMS, including associated manuals, processes and action plans, which led to certification against ISO14001 in 2023 [57]. This attested to a well-established system and the commitment from airport senior officials to mitigate the impact of the infrastructure and its operation on the environment and surroundings. The environmental team from Iloilo Airport, together with the Civil Aviation Authority of Philippines (CAAP) and the support of EU

Projects, has subsequently developed an EMS implementation package to support CAAP in progressively rolling out the EMS across the airport network from 2024 onwards.

The implementation of EMS is location specific and faced different scenarios and environmental challenges at each airport. For example, Luang Prabang Airport in Laos PDR is an airport surrounded by UNESCO sites where the need to respect the local cultural heritage was essential during the implementation of their EMS.

All the expertise accumulated in the various EMS implementations is being shared among the ASEAN Member States in thematic workshops facilitated by EU funded projects, and in a dedicated workstream at ASEAN level led by the ASEAN Air Transport Working Group (ATWG).

#### 5.4 Global Gateway

The European Commission is promoting the green transition externally, aiming to combat climate change and to minimise threats to the environment in line with the Paris Agreement together with Partner States. This includes notably the so-called Global Gateway strategy.



Global Gateway will foster convergence with European or international technical, social, environmental and competition standards, reciprocity in market access and a level playing field in the area of transport infrastructure planning and development. It will serve to enhance the recharging and refuelling infrastructure for zero-emission vehicles and foster the supply of renewable and low-carbon fuels. It will serve to strengthen aviation and maritime links with key partners, while also setting new standards to enhance environmental and social sustainability, create fair competition and reduce emissions in those sectors.

Air transport is acknowledged as a hard to decarbonise sector, while at the same time global air traffic is projected to continue growing, contributing to economic and social growth. This increase in air traffic will increase total aviation emissions if no action is taken. To face this challenge, acknowledging SAF as a cost-effective measure with the potential to significantly reduce the carbon footprint of air transport in the short- and long-term, increased availability and use of SAF outside of Europe has become a strategic objective for the EU. SAF also has a high potential to contribute to the economic development of States, notably in Africa, and to reduce their dependence on imported energy sources.

In December 2023, the European Council endorsed the list of Global Gateway flagship initiatives for 2024, including the global development and use of SAF [58], in line with the strategy's pledge to enhance sustainable transport connections. This will support achieving the objectives of both the Long-Term Aspirational Goal of net zero CO<sub>2</sub> emissions from international aviation by 2050 and the ReFuelEU Aviation Regulation mandate that 70% of fuel supplied by 2050 must be SAF.

The recognition of SAF as a strategic priority provides the opportunity to access dedicated funds that can help reduce the investment gap for sound SAF production projects in Partner States.

### **5.5 Aviation Environmental Project Coordination Group (AEPCG)**

Mindful of the need to maximise the impact of the technical and financial resources made available to Partner States, the European Commission (EC) and the European Union Aviation Safety Agency (EASA) established the Aviation Environmental Projects Coordination Group (AEPCG) in 2020 as a forum to raise awareness and facilitate the coordination of international cooperation support being delivered by EU Entities.

The AEPCG meets twice a year with an increasing number of participants<sup>48</sup> and initiatives being discussed. While the initial intent of the group was to raise awareness and facilitate coordination, the discussions among the group identified synergies in the implementation of CORSIA and the development of SAF. For example, following the provision of technical support to Cambodia that was coordinated between DGAC France and an EU funded project (EU-SEA CCCA CORSIA Project), the Partner State decided to join CORSIA during its voluntary phase. Looking forward, similar synergies are being developed in the concurrent support of the EU and the Government of the Netherlands to the SAF development in Kenya through the ACT-SAF Programme.

This close coordination and collaborative spirit among support partners will be a key factor in successfully meeting future environmental goals.

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<sup>48</sup> AEPCG participants currently include DG MOVE, DG CLIMA, EEAS-FPI, EASA, A4E, ACI-Europe, AEF, Airbus, DGAC-France, ECAC, ENAC, GIZ, Leonardo, Neste, RSB, AESA/SENASA, SkyNRG and UBA.



## List of Resources

- [15] EU (2018), Regulation 2018/1048 laying down airspace usage requirements and operating procedures concerning performance based navigation.
- [16] SESAR (2021), ALBATROSS research project.
- [17] SESAR (2023), HERON research project.
- [18] EUROCONTROL (2024), Sustainable Taxiing Operations – Concept of Operations and Industry Guidance.
- [19] EU (2025), TULIPS Horizon 2020 research project.
- [20] EU (2025), OLGA Horizon 2020 research project.
- [21] EU (2025), STARGATE Horizon 2020 research project.
- [22] Schiphol (2024), Emissions Free by 2030.
- [23] Fraport (2024), Frankfurt Airport Vertical Photovoltaic System.
- [24] Fraport (2024), Frankfurt Airport Using Charging Infrastructure Bidirectionally.
- [25] EU (2024), GOLIAT (Ground Operations of LIquid hydrogen Aircraft) research project.
- [26] EASA (2024), Guidance for the implementation of the new Aircraft Classification Rating (ACR) – Pavement Classification Rating (PCR) method for the EASA Member States.
- [27] ACI-E (2024), European airports' initiatives to incentivise SAF.
- [28] EU (2025), ALIGHT Horizon 2020 research project.
- [29] EU (2025), Trans European Transport Network (TEN-T).
- [30] EU (2023), Alternative Fuels Infrastructure Regulation.
- [31] EU (2025), Connecting Europe Facility.
- [32] EU (2024), Regulation (EU) 2024/1679 of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013.
- [33] EC (2023), Transport infrastructure: over EUR 352 million of EU funding to boost greener mobility.
- [34] EU (2024), CEF Transport Alternative Fuels Infrastructure Facility (AFIF) call for proposal.
- [35] ACI-E (2020), Sustainability Strategy for Airports.
- [36] ACI-E (2024), What is Net Zero? – ACI-E Net Zero Resolution 2024.
- [37] ACI-E (2022), Repository for airport net zero CO<sub>2</sub> roadmaps.



- [38] ACI-E (2022), [Guidance on Airports' Contribution to Net Zero Aviation.](#)
- [39] ACI-E (2023), [Developing an Airport Net Zero Carbon Roadmap.](#)
- [40] ACI-E (2022), [Airport Carbon Accreditation programme.](#)
- [41] ACA (2023), [Offset Guidance Document.](#)
- [42] GHG Protocol (2025), [Scope 2 and 3 Calculation Guidance.](#)
- [43] Air Cargo Belgium (2024), [Digital Green Lane.](#)
- [44] STARGATE (2025), [Digital Twin](#) project.
- [45] Travel Smart (2025), [Emissions Tracker.](#)
- [46] CDP (2025), [Carbon Disclosure Project.](#)
- [47]- Travel Smart (2025), [Case Studies](#) of company best practices.
- [48]- ICAO (2024), [ACT-CORSIA](#) and [ACT-SAF.](#)
- [49] ICAO (2023), [ICAO Global Framework for Sustainable Aviation Fuels \(SAF\), Lower Carbon Aviation Fuels \(LCAF\) and other Aviation Cleaner Energies.](#)
- [50] ICAO (2018), [Kenya](#) – Feasibility study on the use of SAF
- [51] ICAO (2018), [Trinidad and Tobago](#) – Feasibility study on the use of SAF
- [52] ICAO (2018), [Dominican Republic](#) – Feasibility study on the use of SAF.
- [53] ICAO (2018), [Burkina Faso](#) – Feasibility study on the use of SAF.
- [54] ICAO (2023), [Zimbabwe](#) – Feasibility study on the use of SAF.
- [55] ICAO (2023), [Cote d'Ivoire](#) – Feasibility study on the use of SAF.
- [56] ICAO (2023), [Rwanda](#) – Feasibility study on the use of SAF.
- [57] CAAP (2023), [award of ISO14001 Certificate](#) to Iloilo International Airport
- [58] EU (2022), [Global Gateway flagship projects.](#)

## APPENDIX A

### DETAILED RESULTS FOR ECAC SCENARIOS FROM SECTION A

#### BASELINE SCENARIO

##### a) Baseline forecast for international traffic departing from ECAC airports

Year	Passenger Traffic (IFR movement) (million)	Revenue Passenger Kilometres <sup>49</sup> RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres transported <sup>50</sup> FTKT (billion)	Total Revenue Tonne Kilometres <sup>51</sup> RTK (billion)
2010	4.71	1,140	0.198	41.6	155.6
2019	5.88	1,874	0.223	46.9	234.3
2023	5.38	1,793	0.234	49.2	228.5
2030	6.69	2,176	0.262	55.9	273.5
2040	7.69	2,588	0.306	69.0	327.8
2050	8.46	2,928	0.367	86.7	379.5

Note that the traffic scenario shown in the table is assumed for both the baseline and implemented measures scenarios.

##### b) Fuel burn and CO<sub>2</sub> emissions forecast for the baseline scenario

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	0.0327	0.327
2019	53.30	168.42	0.0280	0.280
2023	48.41	152.96	0.0268	0.268
2030	54.46	172.10	0.0250	0.250
2040	62.19	196.52	0.0240	0.240
2050	69.79	220.54	0.0238	0.238

For reasons of data availability, results shown in this table do not include cargo/freight traffic.

<sup>49</sup> Calculated on the basis of Great Circle Distance (GCD) between the airports of the available passenger reports (subset of the global traffic ; from 97% in 2010 up to 99% for the forecast years).

<sup>50</sup> Includes passenger and freight transport (on all-cargo and passenger flights).

<sup>51</sup> A value of 100 kg has been used as the average mass of a passenger incl. baggage (ref: ICAO).

c) *Average annual fuel efficiency improvement for the Baseline scenario*

Period	Average annual fuel efficiency improvement (%)
2010-2023	-1.50%
2023-2030	-1.01%
2030-2040	-0.40%
2040-2050	-0.08%

## IMPLEMENTED MEASURES SCENARIO

### 2A) EFFECTS OF AIRCRAFT TECHNOLOGY IMPROVEMENTS AFTER 2023

d) *Fuel consumption, CO<sub>2</sub>, and CO<sub>2</sub> equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology improvements after 2023 included. The well-to-wake emissions are determined by assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn<sup>52</sup>:*

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Well to Wake CO <sub>2</sub> equivalent emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	147.77	0.0334	0.334
2019	53.30	168.42	206.80	0.0284	0.284
2023	48.41	152.96	187.82	0.0270	0.270
2030	53.64	169.50	208.12	0.0246	0.246
2040	56.60	178.84	219.59	0.0218	0.218
2050	54.77	173.06	212.50	0.0187	0.187

*For reasons of data availability, results shown in this table do not include cargo/freight traffic.*

<sup>52</sup> "Well-to-wake CO<sub>2</sub>e emissions of fossil-based JET fuel are calculated by assuming an emission index of 3.88 kg CO<sub>2</sub>e per kg fuel (see DIN e.V., "Methodology for calculation and declaration of energy consumption and GHG emissions of transport services (freight and passengers)", German version EN 16258:2012), which is in accordance with 89 g CO<sub>2</sub>e per MJ suggested by ICAO CAEP AFTF."

e) Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology only)

Period	Average annual fuel efficiency improvement (%)
2010-2023	-1.50%
2023-2030	-1.22%
2030-2040	-1.19%
2040-2050	-1.55%

## 2B) EFFECTS OF AIRCRAFT TECHNOLOGY AND ATM IMPROVEMENTS AFTER 2023

f) Fuel consumption, CO<sub>2</sub> and CO<sub>2</sub> equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology and ATM improvements after 2023. The well-to-wake CO<sub>2</sub> equivalent emissions are determined by assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn:

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Well-to-Wake CO <sub>2</sub> equivalent emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	148.02	0.0327	0.327
2019	53.30	168.42	207.16	0.0280	0.280
2023	48.41	152.96	188.14	0.0268	0.268
2030	52.57	166.11	204.31	0.0241	0.241
2040	53.20	168.11	206.78	0.0205	0.205
2050	49.29	155.75	191.58	0.0168	0.168

For reasons of data availability, results shown in this table do not include cargo/freight traffic.

g) Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology and ATM improvements)

Period	Average annual fuel efficiency improvement (%)
2010-2023	-1.50%
2023-2030	-1.51%
2030-2040	-1.60%
2040-2050	-1.98%

h) Equivalent CO<sub>2e</sub> emissions forecasts for the scenarios described in this common section, assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn:

Year	Well-to-wake CO <sub>2</sub> e emissions (10 <sup>9</sup> kg)			% improvement by Implemented Measures (full scope)
	Baseline Scenario	Implemented Measures Scenario		
		Aircraft techn. im- provements only	Aircraft techn. and ATM improvements	
2010	147.77			
2019	206.80			
2023	187.82			
2030	211.32	208.12	203.95	-3%
2040	241.30	219.59	206.41	-14%
2050	270.79	212.49	191.24	-29%
For reasons of data availability, results shown in this table do not include cargo/freight traffic.				

## 2C) EFFECTS OF AIRCRAFT TECHNOLOGY, ATM IMPROVEMENTS AND SAF AFTER 2023 ON EU27+EFTA INTERNATIONAL DEPARTURES

The Net CO<sub>2</sub> emissions and expected benefits of SAF use are calculated where regional measures are taken (e.g. ReFuelEU Aviation) in the European scenario with measures.

i) Fuel consumption, CO<sub>2</sub>, Net CO<sub>2</sub> emissions of international passenger traffic departing from EU27+EFTA airports, with aircraft technology and ATM improvements after 2023 The tank-to-wake Net CO<sub>2</sub> emissions are based on the use of Sustainable Aviation Fuels (ReFuelEU Aviation, 70% decarbonation factor for the synthetic aviation fuels, and 65% for aviation biofuels).

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Tank-to-Wake Net CO <sub>2</sub> emissions (10 <sup>9</sup> kg)
2010	27.84	87.97	87.97
2019	38.19	120.69	120.69
2023	34.08	107.71	107.71
2030	36.97	116.84	112.21
2040	35.63	112.60	87.15
2050	32.80	103.63	54.67
For reasons of data availability, results shown in this table do not include cargo/freight traffic.			

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## LIST OF ABBREVIATIONS

- AAT** - Aircraft Assignment Tool
- ACARE** – Advisory Council for Research and Innovation in Europe
- ACA** – Airport Carbon Accreditation
- ACI** – Airports Council International
- AIRE** – The Atlantic Interoperability Initiative to Reduce Emissions
- APER TG** - Action Plans for Emissions Reduction Task Group of the ECAC/EU Aviation and Environment Working Group (EAEG)
- ATM** – Air Traffic Management
- CAEP** – Committee on Aviation Environmental Protection
- CNG** – Carbon neutral growth
- CORSIA** - Carbon Offsetting and Reduction Scheme for International Aviation
- EAER** – European Aviation Environmental Report
- EASA** – European Aviation Safety Agency
- EC** – European Commission
- ECAC** – European Civil Aviation Conference
- EEA** – European Economic Area
- EFTA** – European Free Trade Association
- EU** – European Union
- EU ETS** – the EU Emissions Trading System
- GHG** – Greenhouse Gas
- ICAO** – International Civil Aviation Organisation
- IFR** – Instrumental Flight Rules
- IPCC** – Intergovernmental Panel on Climate Change
- IPR** – Intellectual Property Right
- JU** – Joint Undertaking
- LTAG** – Long-Term Aspirational goal for international aviation
- MBM** – Market-based Measure
- MT** – Million tonnes
- PRISME** - Pan European Repository of Information Supporting the Management of EATM
- RED** – Renewable Energy Directive
- RPK** – Revenue Passenger Kilometre
- RTK** – Revenue Tonne Kilometre



**RTD** – Research and Technological Development  
**SAF** – Sustainable Aviation Fuels  
**SES** – Single European Sky  
**SESAR** – Single European Sky ATM Research  
**SESAR JU** – Single European Sky ATM Research Joint Undertaking  
**SESAR R&D** – SESAR Research and Development  
**SMEs** - Small and Medium Enterprises

— END —

## Section 2: National actions in Denmark

The following section describe national actions in Denmark. First, there is a section on Danish state policies. This section describes political agreements and/or initiatives. The second section consists of actions or initiatives from Danish aviation stakeholders. These cannot be considered official policy adopted by the Danish Government. Any numbers or data on CO<sub>2</sub> emissions should not be counted in when aggregating the emissions from Denmark. Only data from section 1, the common section for European State Action Plans, should be used for further assessment of the CO<sub>2</sub> emissions from international aviation from Denmark.

### The Danish State

#### *National passenger tax and support for the green transition of the aviation sector*

A majority in the Danish Parliament has decided to introduce a national passenger tax from 2025. The tax will apply to passengers departing from a Danish airport and does not apply to passengers departing airports in Greenland or the Faroe Islands. The tax rates are graduated based on the final destination of the flight, as per table 2.

Table 1

Tax rates in the national passenger tax (DKK per flight, current prices)						
	2025	2026	2027	2028	2029	2030
<b>Intra-europe, incl. domestic</b>	30	30	30	40	40	50
<b>Medium length flights</b>	250	260	270	280	300	310
<b>Long flights</b>	300	320	340	350	390	410
<b>Average</b>	70	72	75	85	90	100
<b>Notes:</b> The average is rounded to the nearest 5 DKK except for 2026, where it is rounded to the nearest 2 DKK. Tax rates are subject to price-indexation after 2030.						

A portion of the revenue generated from the passenger tax is allocated to support the green transition of the aviation sector. Specifically, a total of approximately DKK 3.500 million has been allocated to the following initiatives:

- Enable the establishment of a green domestic route in 2025 (DKK 800 million)
- Enable fully green domestic aviation from 2030 (DKK 1.550 million)
- A funding pool to support the green transition of aviation (DKK 1.100 million). The specific allocation of these funds has not yet been decided. Allocation will be subject to a decision by the political parties behind the agreement to introduce the passenger tax.

The funding aims, among other things, to bridge the current price gap between fossil aviation fuels and technologies that enable green flights (e.g. SAF, hydrogen, and electric aircraft). The price gap can hinder the adoption and scaling of the green technologies. By bridging the price gap, public funding can help stimulate the development and adoption of these green technologies within the aviation sector.

#### *National carbon tax*

A majority in the Danish Parliament has decided to introduce a uniform carbon tax on industry. The carbon tax applies to fuels used in domestic aviation. The tax will take effect on 1 January 2025 and will be gradually phased in towards 2030. For activities outside the EU's quota trading system (ETS), the carbon tax is DKK 750 per emitted tons CO<sub>2</sub> in 2030. For activities covered by the EU ETS the rate is DKK 375 per emitted tons of CO<sub>2</sub>.

The tax is a market-based mechanism intended to ensure cost efficient reductions in carbon emissions.

#### **Danish Aviation Stakeholders**

The second section consists of actions or initiatives from Danish aviation stakeholders, such as airports, airlines, Air Traffic Services.

#### *Airports*

##### Copenhagen Airports A/S

Copenhagen Airports A/S is the operator of Copenhagen Airport and Roskilde Airport. Copenhagen Airport is the busiest airport in Denmark, accommodating just under 30 million passengers in 2024. Copenhagen Airport has achieved level 4+ under the Airport Carbon Accreditation. Roskilde Airport is a general aviation airport, which in 2024 handled just under 60,000 flight operations.

Copenhagen Airports has set a near-term and long-term emissions reduction target and is making significant investments in decarbonization. The near-term target is to achieve net zero emissions from the airport's operations by 2030. This entails a 90% absolute reduction of scope 1 and 2 greenhouse gas emissions against a 2019 baseline and compensation of the residual emissions with high quality carbon removal credits. The long-term target is to achieve net zero greenhouse gas emissions across the value chain (scope 1, 2 and 3) by 2050.

Since 2019, Copenhagen Airports has reduced the combined scope 1 and 2 emissions by approximately 18%. These emission reductions were achieved primarily through the deployment of on-site solar PV generation, the gradual electrification of our vehicle fleet, and a broad portfolio of energy efficiency building retrofits.

To achieve a further 82% reduction of the scope 1 and 2 emissions, Copenhagen Airports is pursuing a strategy comprised of three key decarbonization levers, which are renewable energy procurement, continued vehicle and equipment fleet electrification, and the phase-out of natural gas heating systems. In December of 2024, Copenhagen Airports entered into a power purchase agreement (PPA) linked to two wind farms off the coast of Jutland. The PPA is effective from

January 1, 2025, and will secure an additional 70% reduction of the combined scope 1 and 2 emissions (market-based) relative to 2019. The continued electrification of vehicle and equipment fleet will contribute a further 4-5.5% reduction by 2030, and the conversion of natural gas heating systems to electric heat pumps and lower-carbon district heating will yield an additional 2.5% reduction.

With regards to the value chain emissions (scope 3), the airport has identified a series of decarbonization levers addressing each of the significant scope 3 emissions categories. These levers include, but are not limited to the following:

- Airspace optimization and operational efficiency
- Economic incentive schemes aimed at increasing SAF uptake
- Circular construction practices and use of lower-carbon building materials
- Procurement of consumables with lower lifecycle emissions
- Incentive schemes aimed at encouraging lower-carbon passenger surface access transport to and from the airports

In 2025 and 2026, the aim is to strengthen our approach to scope 3 decarbonization and collaborate closely with key stakeholders including airlines, the air traffic service provider, handling companies, real estate tenants, and suppliers to plan and execute concrete actions that deliver significant scope 3 emissions reductions over the near- and medium-term.

For the past four years, Copenhagen Airports has contributed to research and development in sustainable aviation via the ALIGHT project. In 2020, a consortium of 17 diverse partners led by Copenhagen Airports secured an EU Horizon tender to design the sustainable airport of the future. This European initiative, named "ALIGHT - A Lighthouse for the Introduction of Sustainable Aviation Solutions for the Future", aims to pave the way for zero-emissions airports and infrastructure for carbon-neutral aircraft. With nearly DKK 90 million in funding, the consortium has developed and showcased practical solutions and examples related to two critical challenges in achieving a more sustainable aviation industry. The first challenge relates to sustainable aviation fuel (SAF) operations and logistics, and the second relates to smart energy solutions for airport operations. In 2025, the consortium will finalize the project, publishing a lighthouse concept and replication toolbox to promote the adoption of sustainable practices across European airports.

### Billund Airport

Billund Airport acknowledges the urgent need for climate action and is aware of its responsibility to drive a development towards a sustainable future for airport operations and a sustainable aviation industry. Aiding to this, Billund Airport has committed to become a 'Zero Emission Airport' by 2030 the latest, meaning that the airport aims to reduce CO<sub>2</sub>-emissions within its own control (scope 1 and 2) by 90% compared to the 2019 levels.

Since 2021, Billund Airport has received accreditation for 'Level 1 – Mapping' by the Airport Carbon Accreditation. Billund Airport currently finds itself in the process of achieving accreditation for 'Level 2 – Reduction', and pursues further advancement in the years to come. To guide this effort, Billund Airport has developed and implemented a roadmap that outlines its path towards emission reductions and describes the organizational embeddedness of the decarbonization agenda, ultimately to secure a systemic approach to climate action.

In terms of past and current reduction measures, 60% of all vehicles in Billund Airport are electric. In line with this, charging points for electric vehicles are provided at parking zones for passengers and staff, and it has been decided to expand the charging infrastructure to a total of 250 charging points. Billund Airport has secured a 100% supply of renewable electricity and continues to install more energy-efficient solutions, e.g. for ventilation systems. In addition to this, Billund Airport is engaged in innovation clusters, e.g. the Triangle Energy Alliance, which seeks to improve the infrastructure for sustainable e-fuels.

Moving forward, a dedicated effort is required to deliver emission reductions. Billund Airport continues to replace fossil vehicles with electric ones. Alongside this, an increased effort will be made to engage value chain actors, including but not limited to airlines, suppliers, tenants, and passengers, in a joint pursuit of more resource-effective operations, products, and services.

### Aalborg Airport

As the third largest airport in Denmark with over 1.4 million passengers per year (2023). Aalborg works purposefully to contribute to the green transition and become a more climate-friendly company. The goal must be achieved, among other things, through investments in environmentally friendly equipment, increased awareness of sustainability and by participating in Airport Carbon Accreditation (ACA) to systematize and reduce the CO<sub>2</sub> footprint.

Aalborg Airport has risen from level 2 to level 3 in "Airport Carbon Accreditation" in January 2024, as the second airport in Denmark. By achieving level 3, Aalborg Airport has:

- Delivered documentation of effective procedures for handling CO<sub>2</sub>.
- Maintained a policy for CO<sub>2</sub> reduction for scope 1 and 2, and demonstrated improvements and reductions.
- Updated and updated emissions for scope 1 and 2, as well as parts of scope 3 annually.
- Maintained a stakeholder involvement plan with ongoing dialogue with stakeholders, on, among other things, best practice and promoting collaboration, with the aim of being able to reduce emissions.

It is Aalborg Airport's goal to be level 3+ neutral in 2025. A prerequisite for this goal is to be able to factor in a climate project. In this project, Aalborg Airport has established a partnership with a local landowner on the nearby island Egholm regarding flight safety and climate compensation through conversion of agricultural land to sustainable grassland vegetation. The project is in the process of being verified before it can be recognized.

Improvements Aalborg Airport has achieved in scope 1 and 2 are:

- 50% of all ground handling equipment is electric. The replacement will continue until everything is 100% electric. This must be done gradually, so as not to discard material if it still works or can be reused.
- 99% of all lighting has been replaced with LED in the terminal, parking areas, runway and apron.

Aalborg Airport has also started activities to reduce scope 3 such as:

- Establishment of 75 charging stations. We are in ongoing dialogue about the establishment of new charging stations to promote the green transformation based on demand from customers and stakeholders.
- To support the development of green fuel, among other things in the development of PtX aviation fuel where Aalborg Airport will provide infrastructure and is the link to aviation. This is done in close cooperation with, among others, FjordPtX, Green Hub Denmark, Aalborg University, Port of Aalborg, the region etc.

Aalborg Airport has made it a priority and part of their strategy to be sustainable in all projects and investments across the airport. In this way, the airport ensures that the green agenda is supported and integrated throughout the airport's operations.

### *Air Traffic Services*

#### Naviair

Naviair has been designated by the Danish Transport Agency to provide the air traffic services in the Danish airspace. It is mainly provided in the form of air traffic control service.

In air traffic control, flight safety always comes first. The air traffic control concepts are therefore subject to significant procedural requirements. Within the given framework Naviair works to develop and ensure a flexible use of airspace and has implemented "Free route airspace". Naviair's primary approaches to reduction of greenhouse gas emissions are done through:

- Short routes, continuous flights towards the destination and fuel saving flight levels
- Fuel-saving arrivals and departures by using Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO), wherever possible
- Minimum of on-ground waiting time with engines running.

Naviair's climate initiatives are carried out in ongoing dialogues with Naviair's business partners, e.g. local airports and international forums, including COOPANS, BOREALIS, CANSO and Single European Sky.

With focus on Naviair's direct emissions and energy consumption (scope 1 and 2), Naviair has an investment plan for 70% CO<sub>2</sub> reduction, with 2019 as baseline. Reduction initiatives include solar cells on the rooftop, more energy-efficient ventilation systems and the establishment of heat pumps. Naviair's vision is to be CO<sub>2</sub> neutral within direct emissions and energy consumption by 2030.

#### *Other*

#### Climate Partnership for Aviation

The Climate Partnership for Aviation is one of 13 (now 14) climate partnerships initiated by the Danish government in 2019 in cooperation with the business community. The overall purpose of

the partnerships is to establish a 2030 vision and a plan for the sector to contribute to the national 70% CO<sub>2</sub> reduction target (domestic only). However, since emissions from domestic aviation only account for a marginal share of the footprint from the Danish Aviation sector the partnership decided to include international emissions as well.

The Climate Partnership for Aviation is since 2024 headed by Anko van der Werff, CEO, SAS (Chairman), and Christian Poulsen, CEO, Copenhagen Airports (Vice Chairman), supported by a secretariat headed by the trade association Danish Aviation in the framework of the Confederation of Danish Industry – DI. Other partnership members stem from the aviation industry (airlines, airports), unions, NGOs, universities, consultancies etc.

The Climate Partnership delivered its main recommendations in spring 2020. The overall vision for the climate partnership (and Danish aviation as a whole) is to achieve climate neutrality no later than 2050. One important milestone is to contribute to the fulfilment of Denmark's overall climate objective of 70% CO<sub>2</sub>e reduction by 2030 compared to 1990.

The proposed instruments are technological and operational, such as aircraft renewal and, not least, a process of establishing a supply chain for sustainable aviation fuels (gas-to-liquid and PtX). From a national perspective there are three key initiatives and recommendations from the 2020 proposal:

#### 1. National climate fund for aviation

Initiating a national fund to create a market for sustainable aviation fuels by financing the price gap between conventional jet fuels and sustainable aviation fuels. The fund should facilitate a robust platform for investors to engage in production facilities, including wind power facilities (for green H<sub>2</sub>). The fund is to be financed by a climate contribution (DKK 20 – 30) from each passenger departing from Danish airports.

#### 2. A national blending requirement for sustainable aviation fuel

Setting national blending levels to support research, development and supply of sustainable aviation fuels, as well as reducing CO<sub>2</sub> emissions from aviation. Levels should be aligned with the structure of the climate fund.

#### 3. National master plans for green power and carbon capture

A national master plan for expanding green power production capacity for hydrogen production, the allocation of biogas as interim carbon source and, overall, for carbon usage and storage as feedstock for PtX.

Late 2023 the new Danish government decided to introduce a national passenger tax of 100 DKK per pax (average). Half of the funds are aimed as support for the climate related transition while the other half is aimed for funding of social initiatives. In view of these political priorities the Climate Partnership has given its recommendations for the spending of the climate related funds. These are:

- Facilitation of a Danish production of Sustainable Aviation Fuels
- Evaluation of the possibility to secure a supply chain to Danish airports of low-aromatic jet-fuel in order to reduce non-CO<sub>2</sub> effects



## NISA

NISA (Nordic Initiative for Sustainable Aviation) is an organization that works to promote the sustainability of aviation in the Nordic countries. Members of the organization are Nordic airlines, airports, industry organizations, aviation authorities and the aircraft manufacturers Airbus and Boeing. NISA has its office in Denmark. In continuation of previous initiatives and analyses, NISA has since 2021 been working with the EU project ALIGHT with a focus on finding possible solutions regarding the development of SAF and supplies of SAF to Copenhagen Airport. This is done in partnership with CPH, SAS, Airbus, DTI, and a number of European stakeholders within aviation and related knowledge organizations. Furthermore, NISA is engaged in a working group under the Danish MissionGreenFuels grant, which, under Topsoe's leadership, is investigating whether methanol can be approved as a new pathway for SAF, which implies ASTM approval. NISA participates in the Climate Partnership for Aviation and follows relevant SAF-related PtX projects in Denmark, Norway and the Netherlands. Furthermore, NISA collaborates with developers and manufacturers of both sustainable fuels and with developers of aircraft that use other fuels such as electricity and hydrogen.

NISA is participating in NEA, the Nordic network for electric aircraft, also in collaboration with airports, airlines and electric aircraft developers in the Nordics. The purpose is to prepare airports, airlines, and other actors for future use of aircraft with other propellants as electric, hybrid and hydrogen, all of which require major changes in infrastructure and energy access.

## Section 3: Emissions data

The Danish emissions data have been calculated by the Danish Centre for Environment and Energy, Aarhus University. The data are based on all flights inside the state of Denmark and all flights out of Denmark, irrespective of the nationality of the air carrier. The data are in [kilo tons/year]. Please see table 3.

In accordance with the UNFCCC methodology for national CO<sub>2</sub> emissions flights from Denmark to Greenland and the Faroe Islands are counted as domestic traffic. Flights domestically in Greenland and the Faroe Islands and flights between Greenland and the Faroe Islands are not part of the emissions data.

Table 1

year	Domestic	International
2003	153	2126
2004	142	2434
2005	155	2554
2006	162	2563
2007	179	2629
2008	181	2629
2009	173	2297
2010	180	2397
2011	171	2467
2012	149	2493
2013	145	2469
2014	140	2677
2015	131	2622
2016	137	2819
2017	140	2903
2018	141	3038
2019	143	3105
2020	76	979
2021	83	1261
2022	118	2169

## Section 4: Roadmap to SAF

### Introduction

Denmark fully supports ICAO's decision from the ICAO General Assembly in 2022 on net-zero carbon emissions from 2050, including the objective from ICAO's Third Conference on Aviation and Alternative Fuels (CAAF/3) of a 5% CO<sub>2</sub> reduction from international aviation in 2030.

Denmark has on several occasions argued for more ambitious targets for LTAG. In this connection, it is crucial that the sustainability of SAF and other alternative fuels is addressed and documented.

Denmark has good prerequisites for developing and producing SAF through PtX technology (e-SAF). In Denmark, there is no adopted policy in place that determines which fuels the PtX facilities must produce. This is driven by demand. There is thus no guarantee that green hydrogen will be further converted to e-SAF for aviation. In the Danish PtX agreement from 2022, however, it is emphasized that it can be used for a number of hard-to-abate sectors, such as e.g. aviation. Production of e-SAF requires an available carbon source. This can be sourced by capturing CO<sub>2</sub> from, for example, biogas plants, power plants, waste incineration plants and industrial emissions such as cement production.

### The Danish PtX Strategy

Denmark has chosen to invest in the development of PtX as a means to, among other things, making aviation green. In March 2022, the Danish government entered into an agreement with a number of parties in the Danish Parliament on the development and promotion of hydrogen and green fuels: the PtX agreement. The agreement contains an objective to establish 4-6 GW of electrolysis capacity in 2030 for the production of hydrogen and other PtX fuels.

The strategy builds, among other things, on four landmarks:

- PtX must be able to contribute to the fulfillment of Denmark's climate act.
- The regulatory framework and infrastructure must be in place so that Denmark's positions of strength can be utilized and PtX can operate on market terms in the long term.
- The interaction between PtX and the energy system must be strengthened.
- Denmark must be able to export PtX products and technologies.

A task force has been established in Denmark, which works to realize the Danish PtX ambitions by identifying and solving barriers to the development of the PtX sector in Denmark. Most recently, the PtX task force's stakeholder forum has identified the following areas as the most significant barriers to development:

- Access to green electricity. Need for continued work for supply and easy access to large amounts of green electricity.
- Business cases are under pressure from inflation, interest rates, supply chain challenges, electricity prices, support abroad etc.
- Lack of clarity about hydrogen infrastructure. Need for immediate clarity about the framework for operations, financing and other conditions regarding hydrogen infrastructure.

- Access to carbon and CO<sub>2</sub> markets. There is a need for a clear framework on the use of CO<sub>2</sub>, including equal conditions of competition for the CO<sub>2</sub> resource, which enables both use (CCU) and storage (CCS).
- Flexible authority processes. Although several of the authority processes that the facilities have to go through are known, there is a lack of cross-cutting coordination and uniformity in the local processes.
- Lack of stimulation on fuel demand. PtX fuels cannot compete with fossil fuels, so there is still a need for end user support, EU regulation, national regulation and/or access to export markets.

The PtX agreement included a subsidy scheme for the production of green hydrogen in the form of a government tender. DKK 1.4 billion (2024 prices) was set aside.

In September 2023, the Danish government had received applications for approx. 4 billion DKK with a total electrolysis capacity of approx. 675 MW. Of these, five projects were selected with a total electrolysis capacity of 209 MW.

The contracts with the winning projects state that the facilities must be established and put into operation within four years.

### Carbon Capture and Storage

The Danish government has launched a tender for Carbon Capture and Storage (CCS) in 2024. The offer supports the capture, transport and geological storage of CO<sub>2</sub>. The facility must be established by December 2029 at the latest and the facility must be in full operation from 2030. It is estimated that 2.3 million tonnes of CO<sub>2</sub> can be stored annually from 2030.

There will be a certain flexibility built into the tender to withdraw from the contract if the operator e.g. sees better business in selling CO<sub>2</sub> for utility purposes.

### Demand for alternative fuels for aviation in Denmark

As stated elsewhere in this State Action Plan, in 2022 there were the following emissions and calculated fuel consumption from domestic aviation and foreign aviation from Denmark respectively, calculated using the IPCC method:

	Ktonnes CO <sub>2</sub> emitted	Fuel consumption, million litres	Fuel consumption, ktonnes
<b>Domestic</b>	118	47	37
<b>International</b>	3.169	1.254	1.003

Conversion factors: 3,16 kg CO<sub>2</sub>/kg Jet A1, 0,8 kg Jet A1/m<sup>3</sup>

Based on Denmark's reporting to CORSIA for 2023, the following fuel consumption by Danish aviation operators can be calculated:

	Ktonnes CO <sub>2</sub> emitted	Fuel consumption, million litres	Fuel consumption, ktonnes
<b>International</b>	939	371	297

### The potential for PtX production in Denmark

As a result of the Danish strategy, PtX projects are developed by the market actors, based on what can form the basis of a viable business case. This means that there are no guarantees as to how many and what kind of PtX projects will be established, nor which fuels they will produce. Therefore, there is no certainty as to how much e-SAF will be produced in Denmark in the future.

In Denmark, a number of PtX projects have been announced publicly, a proportion of which plan to produce e-SAF. The announced e-SAF projects correspond to a total annual production of approx. 180,000 tonnes of e-SAF, which corresponds to approx. five times the consumption in domestic aviation in 2022. It must be emphasized that there is no guarantee that the projects will be realised, as they may depend on changed framework conditions, support etc., just as there may be projects under development of which the Danish Energy Agency is not aware.

## Conclusion

This action plan provides an overview of the actions undertaken by the Kingdom of Denmark and Danish stakeholders – either alone or in collaboration with others – to mitigate the effects of aviation's contribution to climate change. This Action Plan was finalized in January 2025 and shall be considered as subject to update after that date.