

ITALY'S ACTION PLAN

ON CO2 EMISSIONS REDUCTION

EDITION 2024



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LIST OF ACRONYMS AND SYMBOLS

AAF	Alternative Aviation Fuels
AAT	Aircraft Assignment Tool
ACARE	Advisory Council for Research and Innovation in Europe
ACA	Airport Carbon Accreditation
A-CDM	Airport Collaborative Decision Making
ACI	Airports Council International
ADS	Automatic Dependent Surveillance
AEEDB	Aircraft Engine Emissions Database (ICAO)
AEPCG	Aviation Environmental Project Coordination Group
AER	Annual Emission Report (EU ETS)
AMAN	Arrival Manager
AMB	Airport Managing Body
ANSP	Air Navigation Service Provider
ANP	Aircraft Noise and Performance (database)
AO	Aircraft Operator
AOC	Aircraft Operator Certificate
APER	Action Plan on Emissions Reduction
APU	Auxiliary Power Unit
A-SMGCS	Advanced Surface Movement Guidance and Control System
ATC	Air Traffic Control
ATM	Air Traffic Management
AZEA	EU Alliance for Zero-Emission Aviation
CAEP	Committee on Aviation Environmental Protection
CCO	Continuous Climb Operations
CDO	Continuous Descent Operations
CEF	CORSIA Eligible Fuels
CfD	Contract for Difference
CNG	Carbon Neutral Growth
CO ₂	Carbon dioxide
CO ₂ e (or CO ₂ eq)	Carbon dioxide equivalent
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
COVID	Corona Virus Disease
DG-MOVE	(EC) Directorate-General for Mobility and Transport
DMAN	Departure Manager



EAEG	ECAC/EU Aviation and Environment Working Group
EAER	European Aviation Environmental Report
EAO	EUROCONTROL Aviation Outlook
EASA	European Aviation Safety Agency
EATM	European Air Traffic Management
EC	European Commission
ECAC	European Civil Aviation Conference
EEA	European Economic Area
EFTA	European Free Trade Association
eGPU	Electric Ground Power Unit
ENAC	Ente Nazionale Aviazione Civile (Italian Civil Aviation Authority)
ETS	Emissions Trading System
EU	European Union
FABEC	Functional Airspace Block Europe Central
FE	Fuel Efficiency (ratio between fuel burnt and RTK)
FL	Flight Level
FTKT	Freight Tonne Kilometres transported
GCD	Great Circle Distance
GHG	Greenhouse Gas
GPU	Ground Power Unit
ICAO	International Civil Aviation Organization
IFR	Instrument Flight Rules
IFSET	ICAO Fuel Savings Estimation Tool
IPCC	Intergovernmental Panel on Climate Change
JTI	Joint Technology Initiative
JU	Joint Undertaking
LCAF	Lower Carbon Aviation Fuels
LED	Light Emitting Diode
LTAG	Long-term Aspirational Goal for International Aviation
MASE	Ministero dell'Ambiente e della Sicurezza Energetica (Italian Ministry of Environment and Energy)
MBM	Market-based Measure
MEF	Ministero dell'Economia e delle Finanze (Italian Ministry of Economy and Finance)
MIT	Ministero delle Infrastrutture e dei Trasporti (Italian Ministry of Infrastructure and Transport)



MLG	Man Landing Gear
MTOM	Maximum take-off mass
NB	Narrow Body
PBN	Performance-Based Navigation
PCA	Pre-Conditioned Air
PRB	Performance Review Body of the Single European Sky
PRISME	Pan-European Repository of Information Supporting the Management of EATM
PtL	Power-to-Liquid Fuels
RED	Renewable Energy Directive
RET	Rapid Exit Taxiway
RMS	Root-mean-square
RNAV	Area Navigation
RNP	Required Navigation Performance
RPK	Revenue Passenger Kilometre
RSEQ	Runway Sequencing
RTK	Revenue Tonne Kilometre
SAF	Sustainable Aviation Fuels
SBTi	Science Based Targets initiative
SES	Single European Sky
SESAR	Single European Sky ATM Research
SID	Standard Instrument Departure
SISEN	Information System for National Energy Statistics
SMEs	Small and Medium Enterprises
STAR	Standard instrument Arrival
TG	Task Group
TP	Turboprop
TRL	Technology Readiness Level
TSAT	Target Start-up Approval Time
TTOT	Target Take-off Time
UNFCCC	United Nations Framework Convention on Climate Change
WAKE-RECAT	Wake vortex Re-Categorisation
WB	Wide Body



1 COMMON INTRODUCTORY SECTION FOR EUROPEAN STATE ACTION PLANS

The International Civil Aviation Organization (ICAO) Contracting State Italy 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 States¹ of any European organisation dealing with civil aviation. It is currently composed of 44 Member States and was created in 1955.

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.

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.

Italy, 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.

Italy recognises the value of each State preparing and submitting to ICAO an updated State Action Plan for CO₂ 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.

In that context, it is the intention that all ECAC States submit to ICAO an action plan. This is the action plan of Italy.

Italy 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 CO₂ emissions is necessary, and that this should include:

- emission reductions at source, including European support to CAEP work in this matter (standard setting process);
- research and development on emission reductions technologies, including public-private partnerships;

¹ 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.



- development and deployment of sustainable aviation fuels, including research and operational initiatives undertaken jointly with stakeholders to meet the ICAO aspirational vision of reducing CO₂ emissions by 5% by 2030 through increased use of Sustainable Aviation Fuels (SAF) worldwide;
- improvement and optimisation of Air Traffic Management (ATM) 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
- Market Based Measures (MBM), 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 in aggregate, deliver in time the emissions reductions necessary to meet the ICAO long term aspirational goal of net-zero carbon emissions by 2050.

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 the first section of this Action Plan, where the involvement of Italy is described, as well as that of other stakeholders.

In Italy a number of actions are undertaken at the national level, including those by stakeholders. These national actions are reported in the second section of this Plan.

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).



2 CURRENT STATE OF AVIATION IN ITALY

The Italian institutions mainly involved in air transportation sustainability are the Ministry of Infrastructure and Transport, the Ministry of the Environment and Energy, and Enac (Ente Nazionale per l'Aviazione Civile), the Italian Civil Aviation Authority.

Established on 25th July 1997 by the Legislative Decree no. 250/97 as the National Authority, Enac collaborates with the ministries both to provide specialist support and to pursue national policies in a synergistic way.

Italy, through experts nominated by Enac in the ICAO and ECAC environmental working groups, has an active role in the debate on the mitigation measures to reduce the CO₂ emissions due to aviation and, in line with the ICAO resolution 19 of the 37th Assembly in 2010 and following reaffirmations, recognizes the State Action Plan for CO₂ emissions reduction as an important tool to monitor the progress towards the “Long Term global Aspirational Goal” (LTAG) of achieving the net-zero carbon emissions by 2050.

By the wording of its official mission, Enac is committed to regulate, control and oversee the field of civil aviation, by promoting the development of the civil aviation sector, in an environmentally friendly framework.

Enac is engaged in dealing with the diverse regulatory aspects of air transport system and performs monitoring functions related to the enforcement of the adopted provisions, regulating administrative and economic issues. Enac is also entrusted to provide traffic rights or related authorizations to Air Transport Services according to bilateral or multilateral agreements in force.

Its core business is doubtless represented by safety and security control. According to its institutional mandate, Enac performs, in addition to the issues referred to above:

- preliminary inquiries leading to the entrustment to joint-stock companies of concessions for the total management of airports;
- oversight on free access to the market of handling services in national airports;
- regulating procedures of airport services;
- examination and assessment of land use projects and intervention programmes, as well as investments and airport development;
- evaluation of the conditions for warranting the application of State funded fares on certain city pairs;
- certification of personnel operating in the aeronautical/air navigation field;
- enforcement of recommendations issued by the National Flight Safety Agency.

Enac headquarters are in Rome and Representative Offices are located in the major Italian airports.

Enac is strongly engaged at national and international level in pushing forward decision making processes for an environmental and territory protection policy. This is carried out with a holistic



approach and through attentive assessments aiming at limiting the environment impact on airport areas and reducing aircraft noise and emissions pollution.

At a European scale, Italy is fully committed in the definition and implementation of a regulatory framework that, after the amendment in 2023 of the well-consolidated Emission Trading Scheme Directive (Ref. [177]), has seen the entry into force in 2024 of the Regulation “RefuelEU Aviation” (Ref. [179]), which introduces a supply mandate for Sustainable Aviation Fuels (SAF), with minimum shares growing from 2% in 2025 to 70% in 2050.

2.1 AIR TRAFFIC DATA

Table 2.1 presents a summary of air traffic data in Italy (data source Ref. [182]) in which it is possible to observe the abrupt interruption, due to the COVID-19 pandemic in 2020, of the continuous growth started in 2010 in Italy and the following recover to 2019 level in the timeframe 2021-2023.

Year	Tot. Passengers [thousands]	Annual growth	Tot. Passengers normalized with 2019 data
2010	138525	7%	72%
2011	141994	3%	74%
2012	146001	3%	76%
2013	143510	-2%	75%
2014	150243	5%	78%
2015	156965	4%	82%
2016	164368	5%	86%
2017	174628	6%	91%
2018	184811	6%	96%
2019	192200	4%	100%
2020	52760	-73%	27%
2021	80465	53%	42%
2022	164343	104%	86%
2023	196793	20%	102%

Table 2.1. Historic trend of transported passengers in Italy (data source Ref. [182])

As Figure 2.1 shows, the main driver to the pre-pandemic growth comes from the international flights, since domestic flights are almost unvaried between 2010 and 2019. The share of transported passengers between international and domestic flights after the recovery follows the pre-pandemic distribution.





Figure 2.1. Historic trend of share of air traffic generated by international and domestic flights in Italy (data source Ref. [182])

In addition, Figure 2.2 shows the impact of the COVID-19 pandemic on the share of air traffic generated by the connections between Italy and the different world regions, which have been reduced on average by 75% compared to 2019 level. The most affected region has been North America (-93%), whereas the less affected has been Africa & Indian Ocean (-74%)

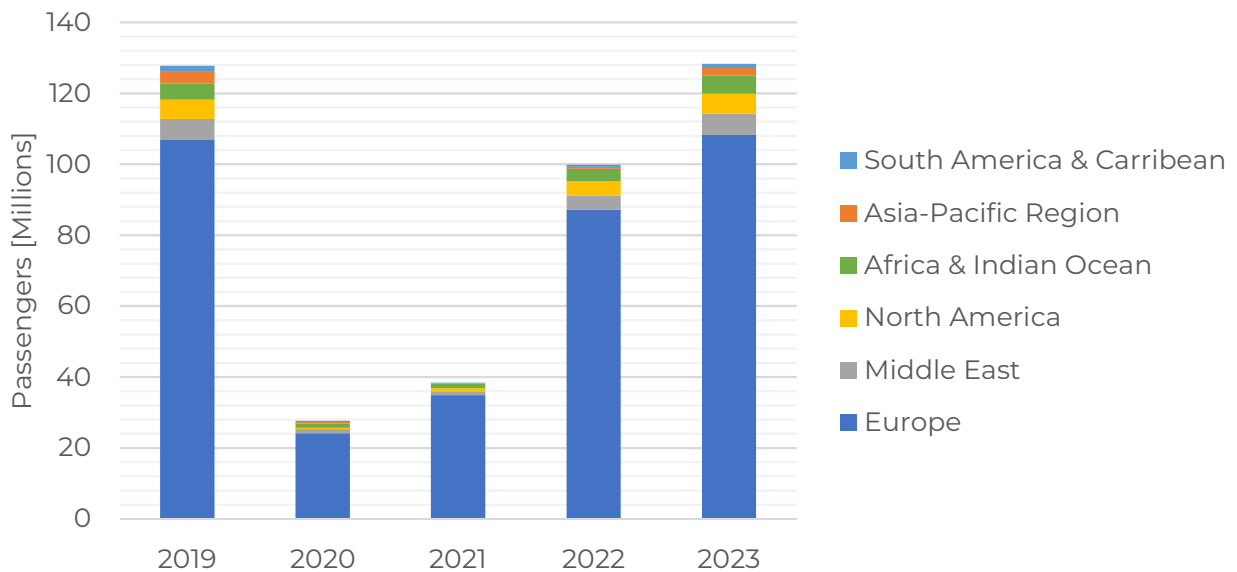


Figure 2.2. Historic trend of share of international air traffic generated by the connections between Italy and the different world regions (data source Ref. [182])

2.2 AIRCRAFT OPERATORS

At the date of September 2024, 9 Italian Aircraft Operators had a valid Air Operator Certificate (AOC), issued by Enac in accordance with Regulation (EU) 965/2012, operating airplanes with more than 19 seats capacity or full-cargo:



Aircraft Operator	ICAO Designator
AEROITALIA S.P.A.	AEZ
AIR DOLOMITI S.P.A.	DLA
CARGOLUX ITALIA S.P.A. [*]	ICV
ITALIA TRASPORTO AEREO S.P.A.	ITY
MSC AIR S.P.A. [*]	LSI
NEOS S.P.A.	NOS
POSTE AIR CARGO S.R.L. [*]	MSA
SIRIO S.P.A.	SIO
SKY ALPS S.R.L.	SWU
[*]: full-cargo	

Table 2.2. Aircraft Operators with a valid Air Operator Certificate (Sept. 2024)

According to EU Regulations, any operator from any EU/EFTA Member State has full right to operate domestic and intra EU/EFTA flights, regardless of the country that issued the AOC. Italy is fully integrated in the European Aviation Market. Extra-European air transport is regulated by bilateral agreements, both traditional (Italy/Third Countries) and European ones, on the basis of the EU External Aviation Policy. Some of them allow the open-skies template and provide for an exchange of fifth freedom traffic rights.

That said, the traffic share of the major airlines operating in Italy, sorted by the total number of passengers transported in 2023, is displayed in the following tables.

Aircraft Operator	Sate of Registry	Tot. Passengers [thousands]
1. Ryanair	Ireland	51593
2. Italia Trasporto Aereo S.p.A.	Italy	15168
3. EasyJet Europe Airline Gmbh	Austria	12656
4. Wizz Air Malta Ltd.	Malta	7841
5. Wizz Air Hungary Ltd	Hungary	7082
6. Vueling Airlines	Spain	5048
7. Malta Air	Malta	3465
8. Deutsche Lufthansa AG	Germany	3451
9. Volotea, S.L.	Spain	3404
10. Air France	France	2808
11. Easyjet UK Ltd	United Kingdom	2713
12. British Airways	United Kingdom	2645
13. Neos S.p.a.	Italy	2204
14. Turkish Airlines Co.	Turkey	2074
15. Eurowings Gmbh	Germany	1961
16. Iberia	Spain	1778
17. Air Dolomiti	Italy	1763
18. KLM Royal Dutch Airlines	Netherlands	1754
19. Emirates	United Arab Emirates	1665
20. Delta Air Lines, Inc.	USA	1411

Table 2.3. Aircraft operators sorted by the total flights' passengers in 2023 (Ref. [182])



Aircraft Operator	Sate of Registry	International Passengers [thousands]
1. Ryanair	Ireland	37023
2. EasyJet Europe Airline Gmbh	Austria	9598
3. Wizz Air Malta Ltd.	Malta	6668
4. Wizz Air Hungary Ltd	Hungary	6513
5. Italia Trasporto Aereo S.p.A.	Italy	6179
6. Vueling Airlines	Spain	4957
7. Deutsche Lufthansa AG	Germany	3450
8. Air France	France	2808
9. Easyjet UK Ltd	United Kingdom	2713
10. British Airways	United Kingdom	2645
11. Neos S.p.a.	Italy	2085
12. Turkish Airlines Co.	Turkey	2074
13. Eurowings Gmbh	Germany	1961
14. Iberia	Spain	1778
15. Air Dolomiti	Italy	1763
16. KLM Royal Dutch Airlines	Netherlands	1754
17. Emirates	United Arab Emirates	1665
18. Volotea, S.L.	Spain	1601
19. Delta Air Lines, Inc.	USA	1411
20. Swiss International Air Lines Ltd	Switzerland	1389

Table 2.4. Aircraft operators sorted by international flights' passengers in 2023 (Ref. [182])

Aircraft Operator	Sate of Registry	Domestic Passengers [thousands]
1. Ryanair	Ireland	14571
2. Italia Trasporto Aereo S.p.A.	Italy	8990
3. EasyJet Europe Airline Gmbh	Austria	3058
4. Malta Air	Malta	2473
5. Volotea, S.L.	Spain	1803
6. Wizz Air Malta Ltd.	Malta	1173
7. Aeroitalia S.r.l.	Italy	980
8. Wizz Air Hungary Ltd	Hungary	569
9. Danish Air Transport A/S	Denmark	220
10. Neos S.p.a.	Italy	119
11. Vueling Airlines	Spain	91
12. Alba Star, S.A.	Spain	62
13. Diamond Sky	Estonia	55
14. Lumiwings	Greece	46
15. Sky Alps S.r.l.	Italy	30
16. Air Horizont	Malta	20
17. Alpvavia D.O.O.	Slovenia	9
18. NyxAir OU	Estonia	6
19. Silver Air Ltd	Czech Republic	4
20. Malta MedAir	Malta	3

Table 2.5. Aircraft operators sorted by domestic flights' passengers in 2023 (Ref. [182])



2.3 AIRPORTS

In Italy there are 45 airports open to commercial traffic which are distributed all over the territory, as illustrated in Figure 2.3.



Figure 2.3. Map of Italian airports open to commercial traffic

In 2023, the total number of passengers arriving and/or departing from Italian airports has been more than 196 million, of which about 60% is shared among Rome, Milan, Bergamo, Naples and Venice, as Table 2.6 shows.

The international fraction of passengers reaches the highest values in cities where the presence of tourists is significant, whereas the highest values of the domestic fraction is reached in airports



located far from the biggest cities as, for example, on the islands.

Airport	Passengers [Millions]	Share of total	% Domestic	% International
1. Roma Fiumicino	40.291	20.5%	21.7%	78.3%
2. Milano Malpensa	25.890	13.2%	19.6%	80.4%
3. Bergamo Orio al Serio	15.967	8.1%	23.1%	76.9%
4. Napoli Capodichino	12.369	6.3%	32.8%	67.2%
5. Venezia Tesserà	11.302	5.7%	20.4%	79.6%
6. Catania Fontanarossa	10.723	5.4%	64.1%	35.9%
7. Bologna Borgo Panigale	10.031	5.1%	24.5%	75.5%
8. Milano Linate	9.371	4.8%	51.3%	48.7%
9. Palermo Punta Raisi	8.117	4.1%	70.6%	29.4%
10. Bari Palese Macchie	6.483	3.3%	50.6%	49.4%
11. Pisa S. Giusto	5.071	2.6%	25.5%	74.5%
12. Cagliari Elmas	4.883	2.5%	74.3%	25.7%
13. Torino Caselle	4.553	2.3%	48.3%	51.7%
14. Roma Ciampino	3.852	2.0%	5.8%	94.2%
15. Verona Villafranca	3.419	1.7%	41.9%	58.1%
16. Olbia	3.253	1.7%	56.2%	43.8%
17. Brindisi Casale	3.181	1.6%	72.1%	27.9%
18. Firenze Peretola	3.054	1.6%	14.1%	85.9%
19. Treviso S. Angelo	3.030	1.5%	6.9%	93.1%
20. Lamezia Terme	2.857	1.5%	77.3%	22.7%
21. Alghero Fertilia	1.493	0.8%	75.2%	24.8%
22. Trapani Birgi	1.337	0.7%	69.7%	30.3%
23. Genova Sestri	1.282	0.7%	59.6%	40.4%
24. Trieste Ronchi dei Legionari	0.929	0.5%	62.7%	37.3%
25. Pescara	0.852	0.4%	43.8%	56.2%
26. Perugia	0.534	0.3%	33.7%	66.3%
27. Ancona Falconara	0.514	0.3%	30.9%	69.1%
28. Lampedusa	0.337	0.2%	100.0%	0.0%
29. Comiso	0.305	0.2%	79.6%	20.4%
30. Reggio Calabria	0.295	0.2%	100.0%	0.0%
31. Rimini Miramare	0.280	0.1%	19.7%	80.3%
32. Crotone	0.230	0.1%	100.0%	0.0%
33. Pantelleria	0.200	0.1%	100.0%	0.0%
34. Forlì	0.135	0.1%	60.4%	39.6%
35. Parma	0.132	0.1%	64.8%	35.2%
36. Cuneo Levaldigi	0.112	0.1%	69.3%	30.7%
37. Bolzano	0.078	<0.1%	25.9%	74.1%
38. Foggia	0.048	<0.1%	94.7%	5.3%
39. Marina di Campo	0.004	<0.1%	90.8%	9.2%
40. Brescia Montichiari	0.001	<0.1%	55.0%	45.0%
41. Grosseto	0.001	<0.1%	0.0%	100.0%
Other airports	<0.001	<0.1%	-	-

Table 2.6. Italian airports sorted by the total flights' passengers in 2023 (Ref. [182])



SECTION 1

Measures taken collectively in Europe



3 EUROPEAN SECTION: 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 CO₂ 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 CO₂ savings.

3.1 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 CO₂ 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 CO₂ 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.

3.2 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.

3.3 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 digitising 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 CO₂ reductions.

3.4 MARKET BASED MEASURES (MBM)

Recognising the need for a global, market-based measure for aviation emissions (to incentivise 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)² 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 CO₂ emissions. In the period 2013 to 2020, the EU ETS has saved an estimated 200 million tonnes of intra-European aviation CO₂ emissions.

3.5 ECAC SCENARIOS FOR TRAFFIC AND CO₂ 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 CO₂ 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.

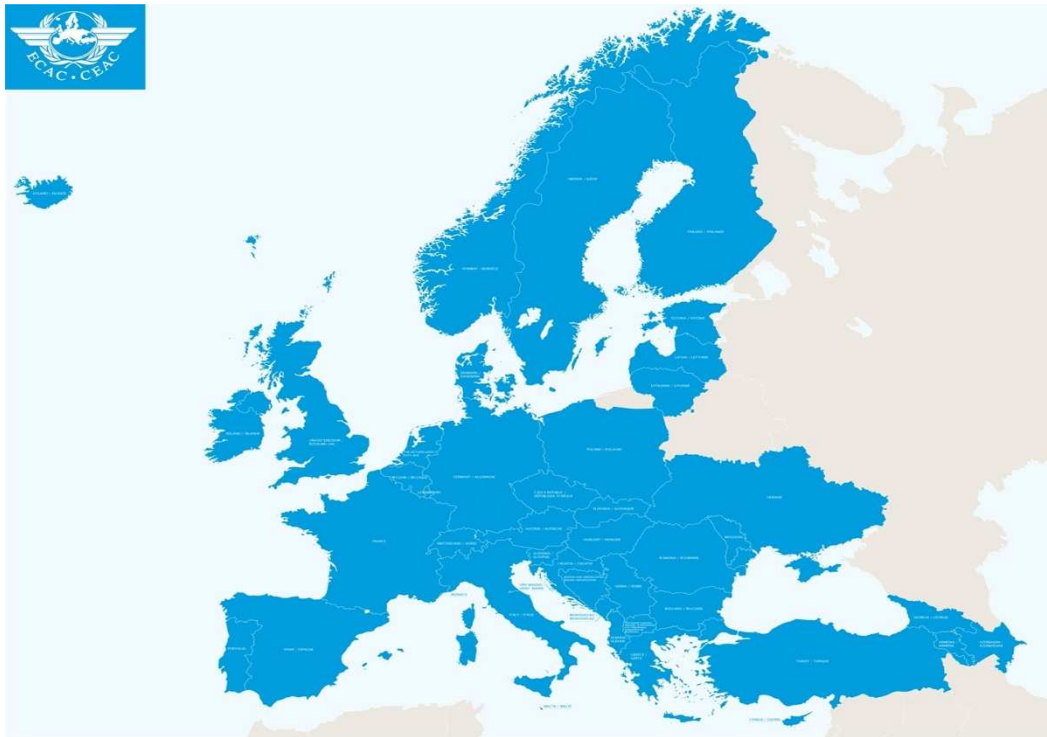
Under the baseline assumptions of traffic growth and fleet rollover with 2023 technology, CO₂ emissions would significantly grow in the long-term for flights departing ECAC airports without mitigation measures. Modelling the impact of improved aircraft technology for the scenario with implemented measures indicates an overall 21% reduction of fuel consumption and CO₂ 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 CO₂ emissions, including the effects of new aircraft types and ATM-

² 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.

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.

4 ECAC BASELINE SCENARIO AND ESTIMATED BENEFITS OF IMPLEMENTED



4.1 ECAC BASELINE SCENARIO

The baseline scenario is intended to serve as a reference scenario for CO₂ 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 CO₂ 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 CO₂ 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).

4.1.1 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 2050³ 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 the Aircraft Assignment Tool).

Table 4.1 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 results⁴ (published in 2024 by EUROCONTROL). Historical data for the year 2010 and 2019 are also shown later for reference.

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

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

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

Table 4.1. Summary characteristics of EUROCONTROL scenarios

4.1.2 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 EAO⁵ (April 2022), covering the long-term flights and CO₂ 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 CO₂ 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 operation 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 4.1 below shows the ECAC scenario of the passenger flight forecasted international departures for both historical (solid line) and future (dashed line) years.

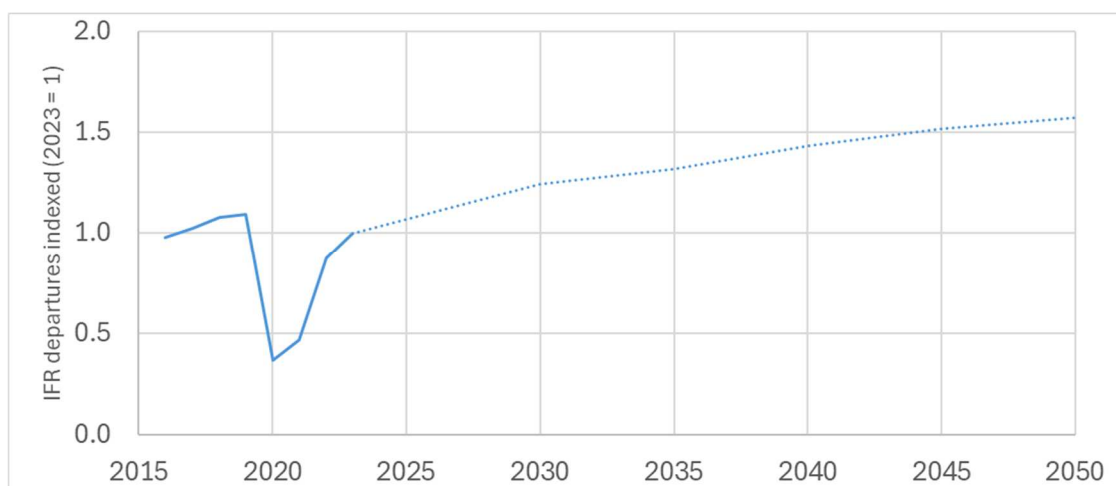


Figure 4.1. Updated EUROCONTROL 'Base' scenario of the passenger flight forecast for ECAC international departures from 2024 to 2050.

⁵ EUROCONTROL Aviation Outlook to 2050, EUROCONTROL, April 2022.

4.1.3 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 departing⁶ 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 (ICAO⁷). 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 PRISME⁸ 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 CO₂ 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 CO₂ 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 CO₂ 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 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.

⁶ 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.

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

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

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 exists⁹.

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 CO₂ emissions of European aviation in the absence of mitigation actions.

Year	Passenger Traffic (IFR movement) (million)	Revenue Passenger Kilometres ¹⁰ RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres transported ¹¹ FTKT (billion)	Total Revenue Tonne Kilometres ¹² 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

Table 4.2. Baseline forecast for international traffic departing from ECAC airports

Year	Fuel Consumption (10 ⁹ kg)	CO ₂ emissions (10 ⁹ 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.				

Table 4.3. Fuel burn and CO₂ emissions forecast for the baseline scenario

⁹ 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.

¹⁰ 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).

¹¹ Includes passenger and freight transport (on all-cargo and passenger flights).

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

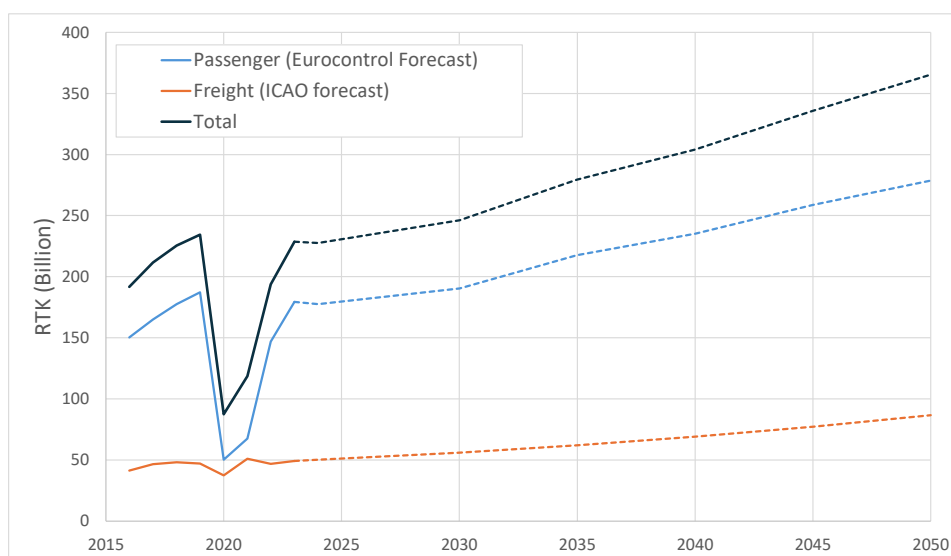


Figure 4.2. Forecasted traffic until 2050 (assumed both for the baseline and implemented measures scenarios)

Although data are not shown in Table 4.2, the number of flights between 2019 and 2023 in Figure 4.2 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 4.3, from 2010 to 2019, the CO₂ 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 CO₂ emissions were lower than the 2019 level, with 153 million tonnes. For the forecast years, the estimated CO₂ 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).

4.2 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 CO₂ 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 Tool¹³ (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 CO₂ 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 CO₂ 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 projects¹⁴ 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 goals¹⁵, the expected SAF supply objectives for 2020 were not met. 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 CO₂ 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 CO₂ emissions are reported in the Appendix of this section for EU27+EFTA international traffic only.**

However, numerous initiatives related to SAF (e.g. ReFuelEU Aviation) are largely described in

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

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

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

Section 5.2 and it is expected that future updates will include an assessment of its benefits as a collective measure.

Effects on aviation's CO₂ 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 4.4¹⁶

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

Table 4.4, Table 4.5, Table 4.6, Figure 4.3 and Figure 4.4 summarize the results for the scenario with implemented measures. It should be noted that Table 4.4 and Table 4.6 show direct combustion emissions of CO₂ (assuming 3.16 kg CO₂ per kg fuel). More detailed tabulated results are found in the following section "Appendix", including results expressed in equivalent CO₂ emissions on a well-to-wake basis (for comparison purposes of SAF benefits).

As shown in Figure 4.3 and Figure 4.4, the impact of improved aircraft technology indicates an overall 22% reduction of fuel consumption and CO₂ emissions in 2050 compared to the baseline scenario. Overall CO₂ 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.

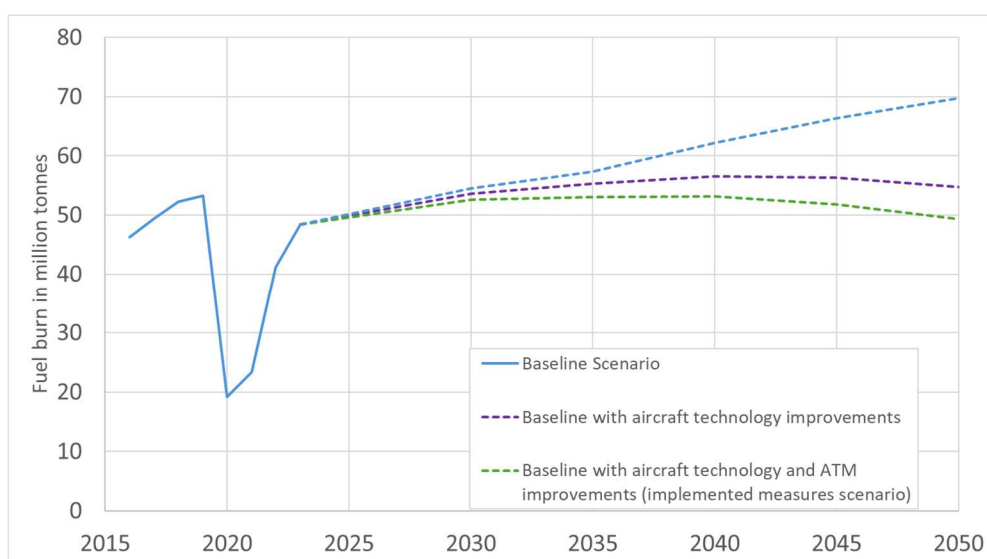


Figure 4.3. Fuel consumption forecast for the baseline and implemented measures scenarios (international passenger flights departing from ECAC airports).

¹⁶ 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).

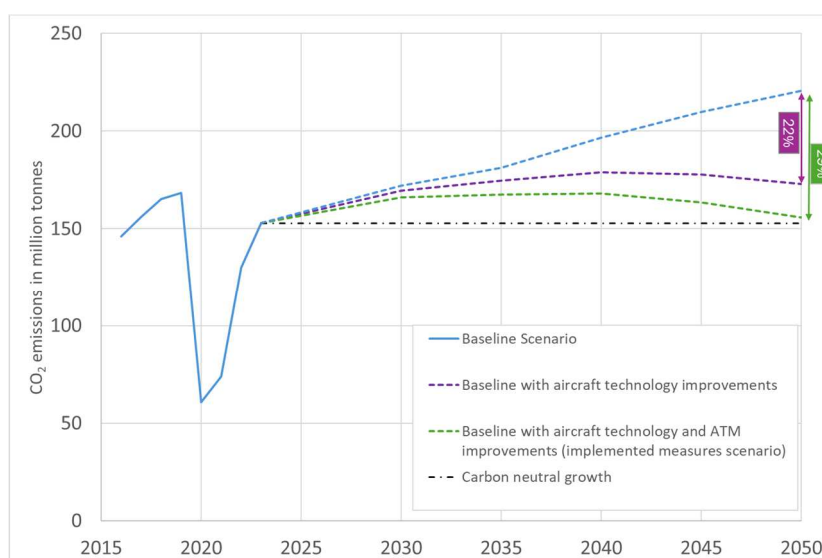


Figure 4.4. CO₂ emissions forecast for the baseline and implemented measures scenarios

Year	Fuel Consumption (10 ⁹ kg)	CO ₂ emissions (10 ⁹ 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.

Table 4.4. Fuel burn and CO₂ emissions forecast for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

As detailed in Table 4.5, 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.

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

Table 4.5. Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

The Table 4.6 below summarises the cumulated effects of each implemented measure. It identifies the weight of the technical improvement on the reduction of CO₂ 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 CO₂ emissions by 29% in 2050 compared to the Baseline scenario.

Year	CO ₂ emissions (109 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.				

Table 4.6. Summary of CO₂ emissions forecast for the scenarios described in this chapter

The following section “Appendix” of this document provides the detailed results for each scenario, Baseline, and by implemented measure, as well as the CO₂ equivalent and EU27+EFTA Net CO₂ emissions.

4.3 APPENDIX: DETAILED RESULTS FOR ECAC SCENARIOS

4.3.1 BASELINE SCENARIO

Baseline forecast for international traffic departing from ECAC airports:

Year	Passenger Traffic (IFR movement) (million)	Revenue Passenger Kilometres ¹⁷ RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres transported ¹⁸ FTKT (billion)	Total Revenue Tonne Kilometres ¹⁹ 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
<i>Note that the traffic scenario shown in the table is assumed for both the baseline and implemented measures scenarios.</i>					

Fuel burn and CO₂ emissions forecast for the baseline scenario:

Year	Fuel Consumption (10 ⁹ kg)	CO ₂ emissions (10 ⁹ 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>				

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%

4.3.2 IMPLEMENTED MEASURES SCENARIO

4.3.2.1 EFFECTS OF AIRCRAFT TECHNOLOGY IMPROVEMENTS AFTER 2023

Fuel consumption, CO₂, and CO₂ equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology improvements after 2023 included. The

¹⁷ 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).

¹⁸ Includes passenger and freight transport (on all-cargo and passenger flights).

¹⁹ A value of 100 kg has been used as the average mass of a passenger incl. baggage (ref: ICAO).

well-to-wake emissions are determined by assuming 3.88 Kg of CO₂ equivalent emissions for 1 Kg of Jet-A fuel burn²⁰:

Year	Fuel Consumption (10 ⁹ kg)	CO ₂ emissions (10 ⁹ kg)	Well to Wake CO ₂ equivalent emissions (10 ⁹ 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
<i>For reasons of data availability, results shown in this table do not include cargo/freight traffic.</i>					

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%

4.3.2.2 EFFECTS OF AIRCRAFT TECHNOLOGY AND ATM IMPROVEMENTS AFTER 2023

Fuel consumption, CO₂ and CO₂ equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology and ATM improvements after 2023. The well-to-wake CO₂ equivalent emissions are determined by assuming 3.88 Kg of CO₂ equivalent emissions for 1 Kg of Jet-A fuel burn:

Year	Fuel Consumption (10 ⁹ kg)	CO ₂ emissions (10 ⁹ kg)	Well-to-Wake CO ₂ equivalent emissions (10 ⁹ 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
<i>For reasons of data availability, results shown in this table do not include cargo/freight traffic.</i>					

²⁰ "Well-to-wake CO_{2e} emissions of fossil-based JET fuel are calculated by assuming an emission index of 3.88 kg CO_{2e} 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_{2e} per MJ suggested by ICAO CAEP AFTF."

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%

Equivalent CO₂e emissions forecasts for the scenarios described in this common section, assuming 3.88 Kg of CO₂ equivalent emissions for 1 Kg of Jet-A fuel burn:

Year	Well-to-wake CO ₂ e emissions (10 ⁹ kg)			% improvement by Implemented Measures (full scope)
	Baseline Scenario	Implemented Measures Scenario		
		Aircraft techn. improvements 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.				

4.3.2.3 EFFECTS OF AIRCRAFT TECHNOLOGY, ATM IMPROVEMENTS AND SAF AFTER 2023 ON EU27+EFTA INTERNATIONAL DEPARTURES

The Net CO₂ emissions and expected benefits of SAF use are calculated where regional measures are taken (e.g. ReFuelEU Aviation) in the European scenario with measures.

Fuel consumption, CO₂, Net CO₂ emissions of international passenger traffic departing from EU27+EFTA airports, with aircraft technology and ATM improvements after 2023 The tank-to-wake Net CO₂ 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 ⁹ kg)	CO ₂ emissions (10 ⁹ kg)	Tank-to-Wake Net CO ₂ emissions (10 ⁹ 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.			

5 ACTIONS TAKEN COLLECTIVELY IN EUROPE

5.1 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 CO₂ 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 CO₂ 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 CO₂ 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 (Ref. [1] - Ref. [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).

5.1.1 AIRCRAFT ENVIRONMENTAL STANDARDS

5.1.1.1 AIRCRAFT CO₂ EMISSIONS

Since 1 January 2020, new aircraft types have to comply with a new type CO₂ standard²¹, 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 CO₂ 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, and so the availability of certified CO₂ data remains limited (Ref. [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 CO₂ 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 CO₂ emissions performance in 2027 and 2037 would need to be reviewed soon for them to remain relevant.

²¹ ICAO Annex 16, Volume III to the Chicago Convention contains international aircraft CO₂ standards. The CO₂ metric is a specific air range-based metric (kg fuel per km flown in cruise) adjusted to take into account fuselage size.

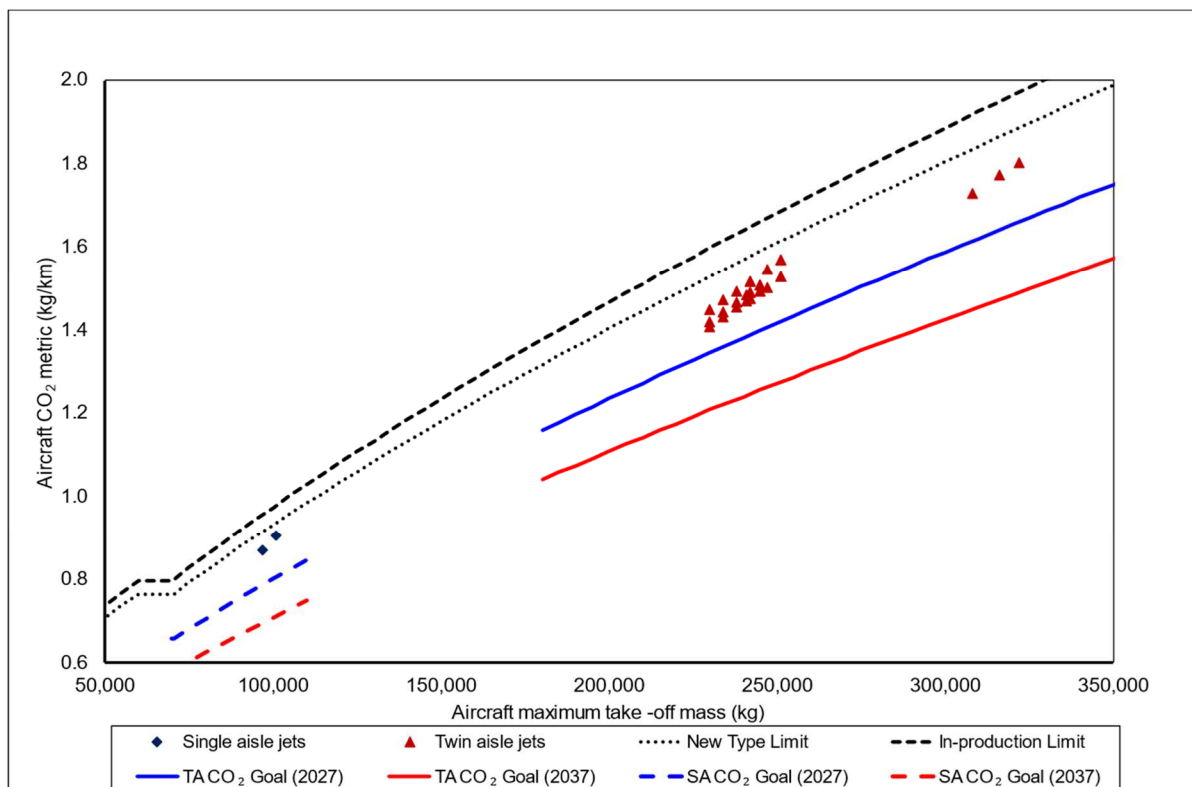


Figure 5.1. Certified aircraft CO₂ emissions performance

5.1.1.2 ICAO DUAL NOISE / CO₂ STANDARD SETTING

A revision of the ICAO Annex 16 standards for aircraft noise and CO₂ 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 CO₂ 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 CO₂ 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 (Ref. [6]).



5.1.2 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.

5.1.2.1 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

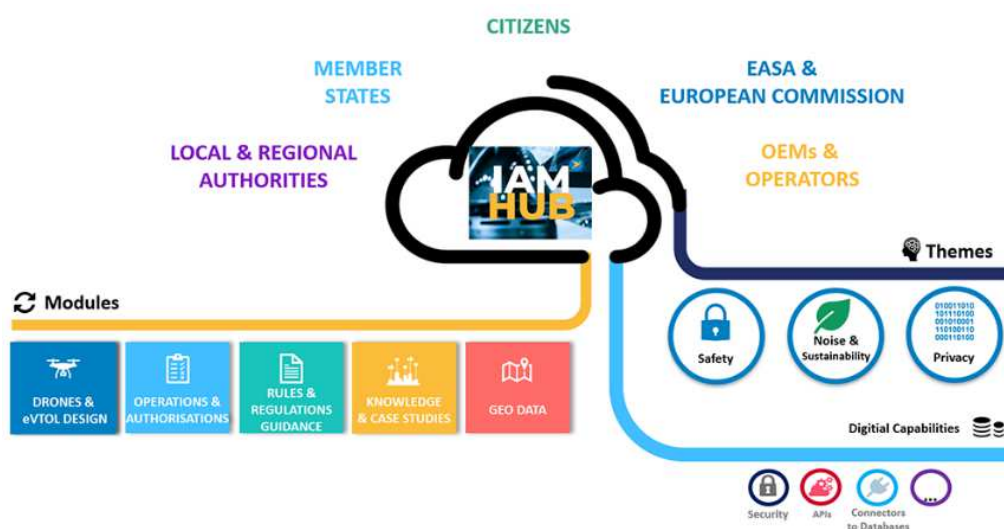


first EPTS, published in 2023, addresses VCA with non-tilting rotors (Ref. [7]), covering designs such as the Volocopter VoloCity or Airbus CityAirbus. The second EPTS, published in 2024, was for VCA powered, at least partially, by tilting rotors (Ref. [8]), covering designs such as the Lilium Jet. These 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.

5.1.2.2 EASA INNOVATIVE AIR MOBILITY HUB

The EASA Innovative Air Mobility (IAM) Hub (Ref. [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 (Ref. [10]).

5.1.2.3 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.

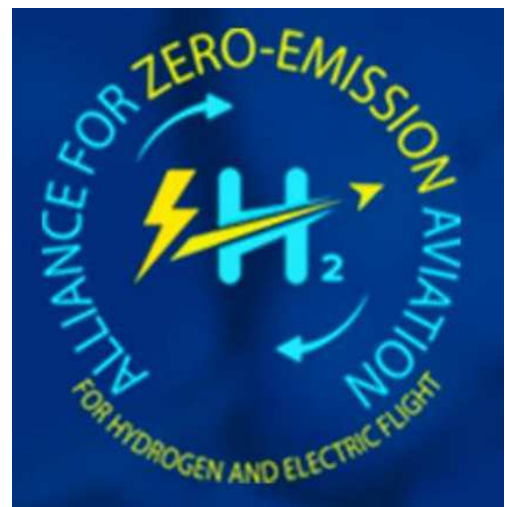


Pioneers in the field have advanced their flight test activity, with H2FLY conducting the world's first piloted flight of a liquid hydrogen powered electric aircraft in September 2023, using their HY4 demonstrator aircraft, operating from Maribor in Slovenia. Other notable flights include ZeroAvia's 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.

5.1.2.4 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 (Ref. [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 (Ref. [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 (Ref. [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.

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

Figure 5.2. ATAG indicative overview of where low- and zero-carbon energy could be deployed in commercial aviation alongside that of SAF (Ref. [16])

In January 2024, AZEA published its Concept of Operation (CONOPS) for the introduction of electric, hybrid-electric and hydrogen powered aircraft (Ref. [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 (Ref. [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 CO₂ 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.

5.1.3 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 (Ref. [17]), and noise, specifically the impact of the sonic boom generated when flying at supersonic speed.

5.1.4 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 (Ref. [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.

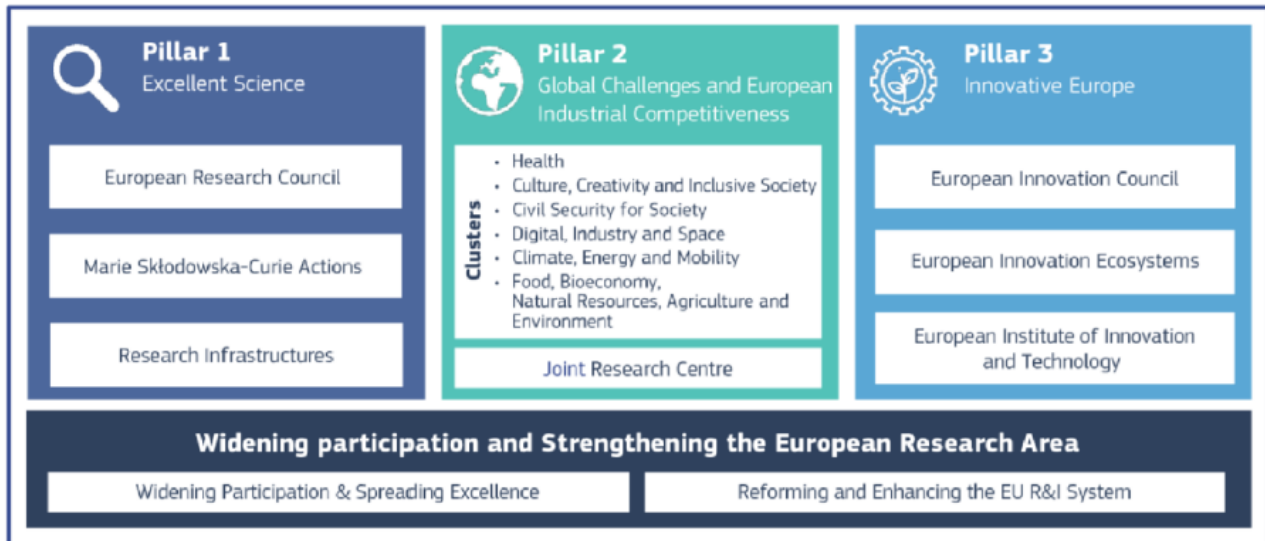
5.1.5 RESEARCH AND INNOVATION PROGRAMMES

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 (Ref. [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-CO₂ emissions, with emphasis on contrails
- reduction of NO_x and particulate matter emissions
- Noise reduction technologies and abatement procedures

One such Horizon Europe project is HESTIA (Ref. [20]) that focuses on increasing the scientific knowledge of the hydrogen-air combustion of future hydrogen-fuelled aero-engines. Another example is BeCoM (Ref. [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 (Ref. [22]).

5.1.5.1 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 (Ref. [23]). Its objectives were to develop, demonstrate, and accelerate the integration of technologies capable of reducing CO₂, NO_x and Noise emissions by 20 to 30% compared to 'state-of-the-art' aircraft in 2014.



Mission Level Assessment				
Concept Model	Assessment	CO ₂ ¹	NO _x ¹	Noise ²
Long Range (LR+)	1st	-13%	-38%	<-20%
	2nd	-18.2%	-44.9%	-20.1%
Short-Medium Range (SMR+ & SMR++)	1st	-17% to -26%	-8% to -39%	-20% to -30%
	2nd	-25.8% to -30.4%	-2.3% to -5.1%	-11.5% to -16.3%
Regional (TP90 - TP130 - MM TP70)	1st	-20% to -34%	-56% to -67%	-20% to -68%
	2nd	-25% to -32.5%	-44% to -60%	+14% to -44%
Commuter³ & BJ	1st	-21% to -31%	-27% to -28%	-20% to -50%
	2nd	-17.3% to -19.6%	-16.5% to -51.5%	-19% to -31%

- (1) CO₂ and NO_x 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 ₂	NO _x	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% (Lden¹)

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

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

Table 5.1. Final Clean Sky 2 Technology Evaluator Assessment Results

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 (Ref. [24]) and the results are summarised in Table 5.1.

5.1.5.2 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 (Ref. [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 CO₂ and non-CO₂ 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 5.2 (Ref. [26]).

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

28. Improvement targets are defined as CO₂ 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).

Table 5.2. Clean Aviation Targets

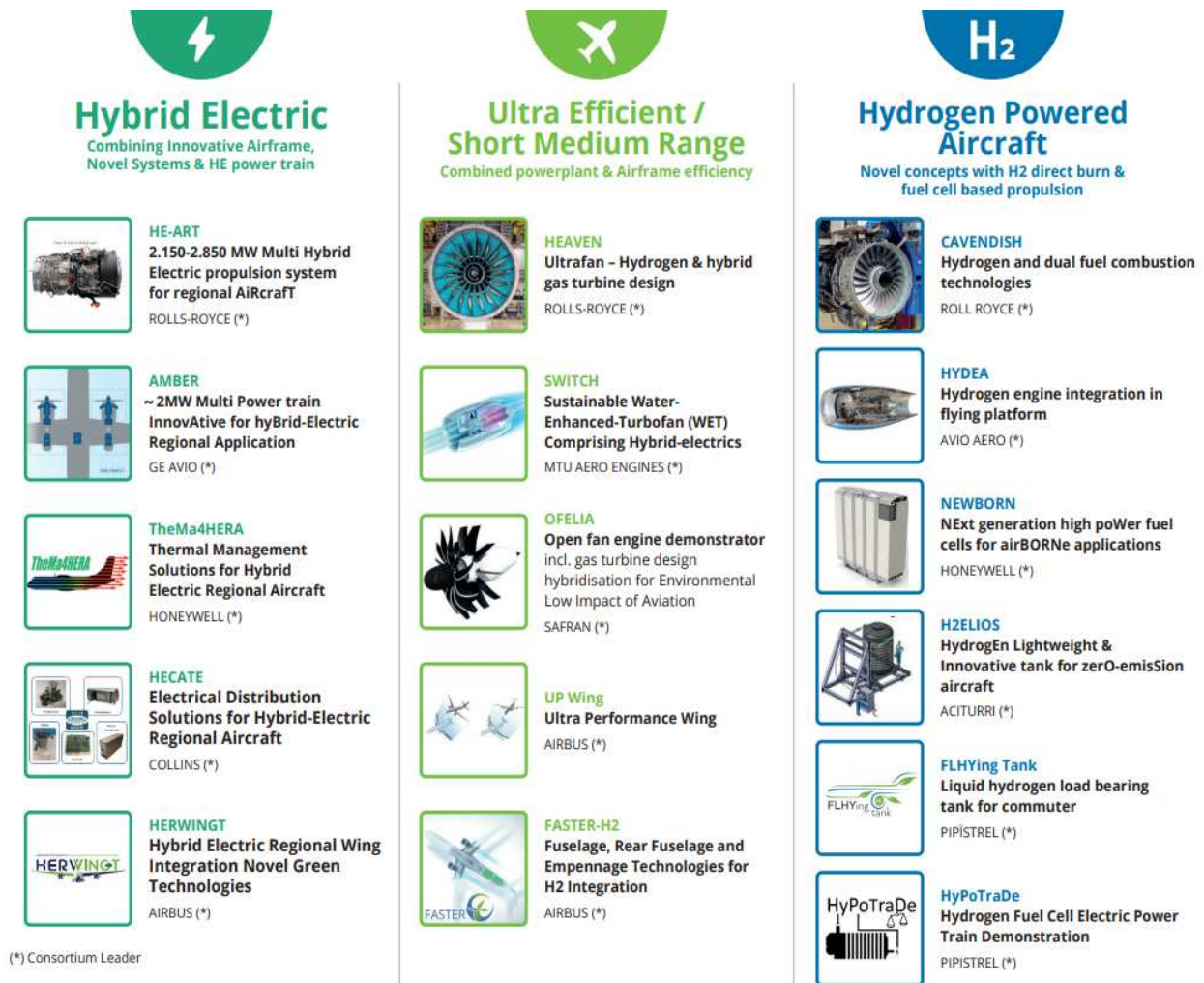


Figure 5.3. Initial projects launched in 2023 to deliver important technology bricks in all three areas

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 MegaWatts). 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 CO₂, NO_x 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 CO₂ 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.

5.1.6 LIST OF RESOURCES

- Ref. [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
- Ref. [2] ICAO (2023), [Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume I, 8th Edition, Amendment 14 — Aircraft Noise](#)
- Ref. [3] ICAO (2023), [Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume II, 5th Edition, Amendment 11 — Aircraft Engine Emissions](#)
- Ref. [4] ICAO (2023), [Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume III, 1st Edition, Amendment 1 — Aeroplane CO₂ Emissions](#)
- Ref. [5] EASA (2025), [EASA Aeroplane CO₂ Emissions Database](#)

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- Ref. [6] ICAO (2025), [ICAO Long Term Global Aspirational Goal \(LTAG\) for International Aviation](#)
- Ref. [7] EASA (2023), [Environmental Protection Technical Specifications applicable to VTOL-capable aircraft powered by non-tilting rotors](#)
- Ref. [8] EASA (2024), [Environmental Protection Technical Specifications applicable to VTOL-capable aircraft powered by tilting rotors](#)
- Ref. [9] EASA (2025), [Environmental Footprint Aviation Study for Drones & eVTOLs](#)
- Ref. [10] AZEA (2025), [Alliance for Zero Emission Aircraft](#)
- Ref. [11] AZEA (2023), [Current aviation regulatory landscape for aircraft powered by hydrogen or electric propulsion](#)
- Ref. [12] EASA (2025), [Innovation Services](#)
- Ref. [13] AZEA (2023), [Current Standardisation Landscape](#)
- Ref. [14] AZEA (2024), [Concept of Operation for the Introduction of Electric, Hybrid-electric and Hydrogen powered Zero Emission Aircraft](#)
- Ref. [15] AZEA (2024), [Flying on electricity and hydrogen in Europe](#)
- Ref. [16] ATAG (2021), [Waypoint 2050 Second Edition](#)
- Ref. [17] ICCT (2022), [Environmental limits on supersonic aircraft in 2035](#)
- Ref. [18] EASA (2025), [General Aviation Flightpath 2030+](#)
- Ref. [19] EU (2025), [Horizon Europe](#)
- Ref. [20] EU (2025), [HESTIA](#) Horizon Europe project
- Ref. [21] EU (2025), [BeCoM](#) Horizon Europe project
- Ref. [22] EU (2025), [EU Research Projects](#)
- Ref. [23] Clean Sky 2 (2014), [Council Regulation \(EU\) No 558/2014](#) of 6 May 2014 establishing the Clean Sky 2 Joint Undertaking
- Ref. [24] Clean Sky 2 (2024), [Technology Evaluator](#)
- Ref. [25] Clean Aviation (2021), [Council Regulation \(EU\) 2021/2085](#) establishing the Joint Undertakings under Horizon Europe
- Ref. [26] Clean Aviation (2024), [Strategic Research & Innovation Agenda](#)
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5.2 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 CO₂ 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 CO₂ and non-CO₂ 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.

5.2.1 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 (Ref. [27]), 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.

5.2.2 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.

Type of ReFuelEU Aviation fuel	Definition in RFEUA Article	Comments
Categories of sustainable aviation fuels (SAF)		
Synthetic aviation fuels	Art 3(12)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001
Advanced aviation biofuels	Art 3(8)(a)	Produced from the feedstock listed in Part A Annex IX of Directive (EU) 2018/2001
Aviation biofuels	Art 3(8)(b)	Produced from feedstock listed in Part B Annex IX of Directive (EU) 2018/2001
Other aviation biofuels	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
Recycled carbon aviation fuels	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		
Low-carbon hydrogen for aviation	Art 3(15)	Produced from non-fossil non-renewable sources
Renewable hydrogen for aviation	Art 3(16)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001
Synthetic low-carbon aviation fuels	Art 3(13)	Produced from non-fossil non-renewable sources
Other aviation fuels under RFEUA		
Conventional aviation fuel	Art 3(14)	Aviation fuels produced from fossil non-renewable sources of hydrocarbon fuels (e.g. crude oil)

Table 5.3. ReFuelEU Aviation fuel categories

According to the ReFuelEU Aviation Regulation, SAF are defined as various types of drop-in aviation fuels (Table 5.3). For instance, aviation biofuels mean biofuels as defined in the Renewable Energy Directive (RED) (Ref. [28]) 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.

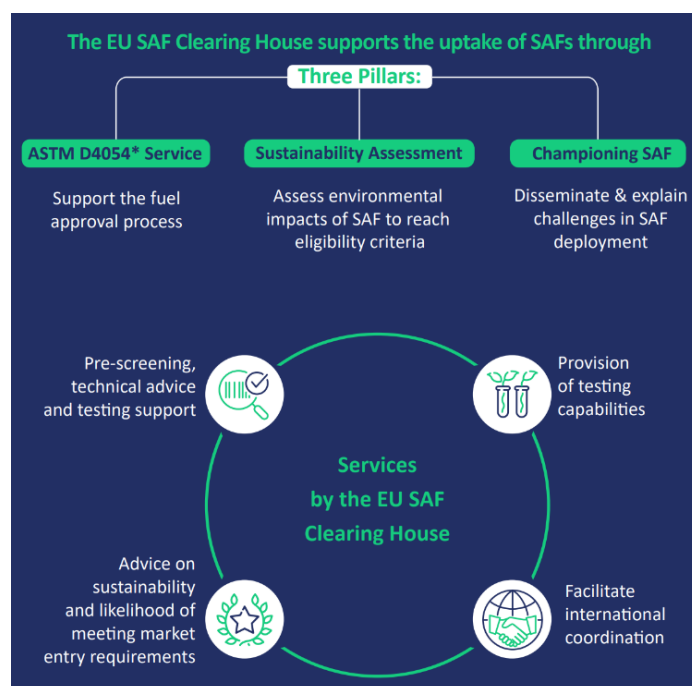
5.2.2.1 STANDARDISATION PROCESS FOR QUALIFICATION OF NEW SAF PRODUCTION PATHWAYS

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 (Ref. [29], Ref. [30]). 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 (Ref. [31]), 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 (Ref. [31]). In addition, three pathways for the co-processing of renewable feedstocks in petroleum refineries are qualified (Ref. [29]) with a feedstock blending limit of up to 24% (see Table 5.4).

In order to be included in ASTM D7566, novel SAF production pathways need to go through a thorough qualification process specified in ASTM D4054 (Ref. [32]). 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).

Production pathway	Feedstocks ²²	Certification name	Maximum SAF share
Biomass Gasification + Fischer-Tropsch (Gas+FT)	Energy crops, lignocellulosic biomass, solid waste	FT-SPK ²³	50%
Hydroprocessed Esters and Fatty Acids (HEFA)	Vegetable and animal fat	HEFA-SPK	50%
Direct Sugars to Hydrocarbons (DSHC)	Conventional sugars, lignocellulosic sugars	HFS-SIP ²⁴	10% ²⁵
Biomass Gasification + FT with Aromatics	Energy crops, lignocellulosic biomass, solid waste	FT-SPK/A ²⁶	50%
Alcohol to Jet (AtJ)	Sugar, starch crops, lignocellulosic biomass	ATJ-SPK	50%
Catalytic Hydrothermolysis Jet (CHJ)	Vegetable and animal fat	CHJ or CH-SK ²⁷	50%
HEFA from algae	Microalgae oils	HC-HEFA-SPK ²⁸	10%
AtJ with Aromatics	Sugar, starch crops, lignocellulosic biomass	ATJ-SKA	50%
FOG Co-processing	Fats, oils, and greases	FOG	5%
FT Co-processing	Fischer-Tropsch (FT) biocrude	FT	5%
Hydroprocessed Lipids Co-processing	Hydroprocessed vegetable oils, animal fats, used cooking oils	Hydroprocessed Lipids Co-processing	10%

Table 5.4. Drop-in SAF qualified production pathways

5.2.2.2 EU SAF CLEARING HOUSE

The EU SAF Clearing House (Ref. [33]), 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

²² The listed feedstocks are technologically feasible for the specific production pathway, but not necessarily applicable under certain regulations (e.g. ReFuelEU Aviation).

²³ FT-SPK: Fischer-Tropsch synthesised paraffinic kerosene.

²⁴ HFS-SIP: hydroprocessed fermented sugars to synthetic iso-paraffins.

²⁵ TRL 7-8 for conventional sugar feedstock; TRL 5 for lignocellulosic sugar feedstock.

²⁶ FT-SPK/A: Fischer-Tropsch synthesised paraffinic kerosene with Aromatics.

²⁷ CH-SK: catalytic hydrothermolysis synthesised kerosene.

²⁸ HC-HEFA-SPK: Synthesised paraffinic kerosene from hydrocarbon-hydroprocessed esters and fatty acids.

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).

5.2.2.3 TWO OPTIONS FOR 100% SAF: DROP-IN AND NON-DROP-IN

Approved SAF currently have associated maximum blending ratios (Table 5.4) 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-CO₂ 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.

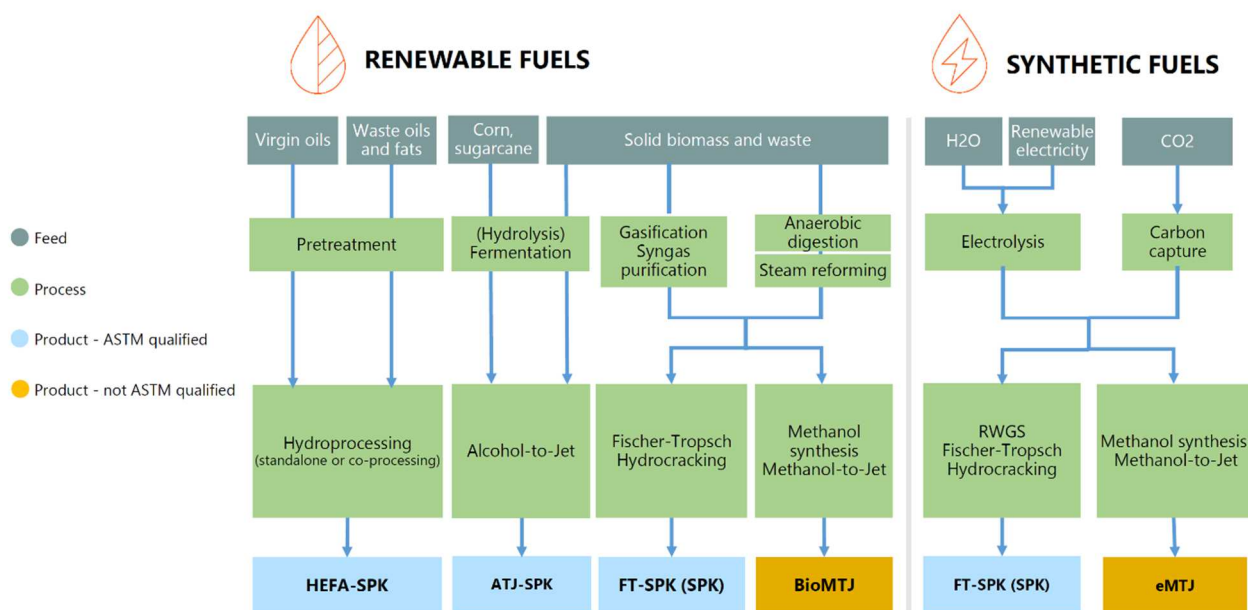


Figure 5.4. Main SAF production pathways with similar building blocks (Ref. [34])

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) (TRL²⁹ 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.

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

²⁹ Technology Readiness Level.

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 CO₂ emission reductions. Water and electricity are used in an electrolyser to generate hydrogen, which is then combined with CO₂ 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 CO₂ required for the PtL process can be obtained from industrial waste gases, biomass, or direct air capture (DAC). With DAC, the CO₂ is directly captured from the air through filters. As the concentration of CO₂ in the air is low, this process is very energy intensive but offers high CO₂ emission reduction potential, once the technology has further matured.

5.2.3 HOW SUSTAINABLE ARE SAF?

5.2.3.1 SUSTAINABILITY CRITERIA

Table 5.5 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) (Ref. [35]).

Scheme	Sustainability criteria
Renewable Energy Directive (2023), Article 29	<p><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_{2e}/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%.</p> <p><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 (Ref. [36]) and can be covered by certification schemes on a voluntary basis. There are also constraints on forest management.</p> <p>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.</p> <p>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.</p>

<p>CORSIA Sustainability Criteria for CORSIA eligible fuels (November 2022)</p>	<p>For batches produced on or after 1 January 2024, the following Sustainability Criteria are applicable:</p> <p><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_{2e}/MJ), including an estimation of ILUC and/or DLUC emissions.</p> <p><i>Carbon Stock</i> - 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.</p> <p><i>Permanence</i> – 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.</p> <p>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.</p>
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Table 5.5. SAF sustainability criteria

5.2.3.2 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_{2e}/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 5.5), but given historic concerns surrounding biofuel sustainability, it is encouraged to calculate actual life cycle emission values rather than applying a default value.

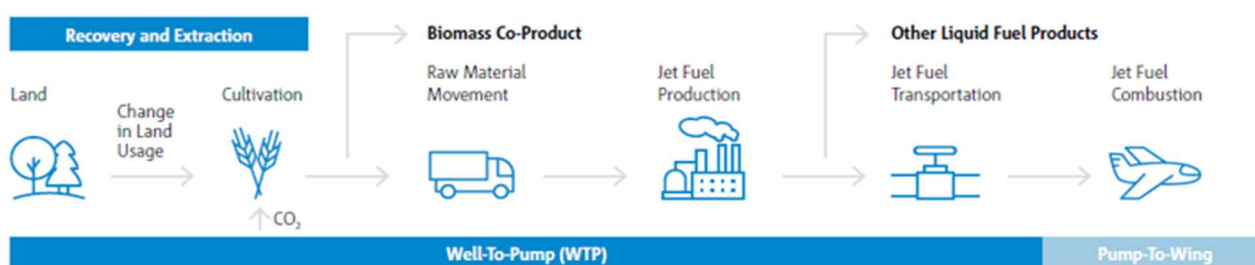


Figure 5.5. Components of typical well-to-wing LCA for biofuel-based jet fuel

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 (Ref. [37]). Land

use change, both direct and indirectly caused by crop displacements, can potentially negate any GHG savings from biofuels, or even release more CO₂-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 5.6 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.

5.2.3.3 SAF AND NON-CO₂ EMISSIONS

Aviation non-CO₂ emissions refer to pollutants other than carbon dioxide (CO₂) that have a climate impact, including nitrogen oxides (NO_x), aerosol particles (soot and sulphur-based) and water vapour. Some types of SAF have the potential to offer significant non-CO₂ emissions reductions (Ref. [38], Ref. [39]).

While it is recognised that aviation non-CO₂ emissions contribute to the overall climate impact, these non-CO₂ 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-CO₂ aviation effects.

Research projects, such as AVIATOR and RAPTOR (Ref. [40], Ref. [41]) have shown that the use of certain types of SAF could have positive impacts on local air quality (Ref. [42]) 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) (Ref. [43]).

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 (Ref. [44]).

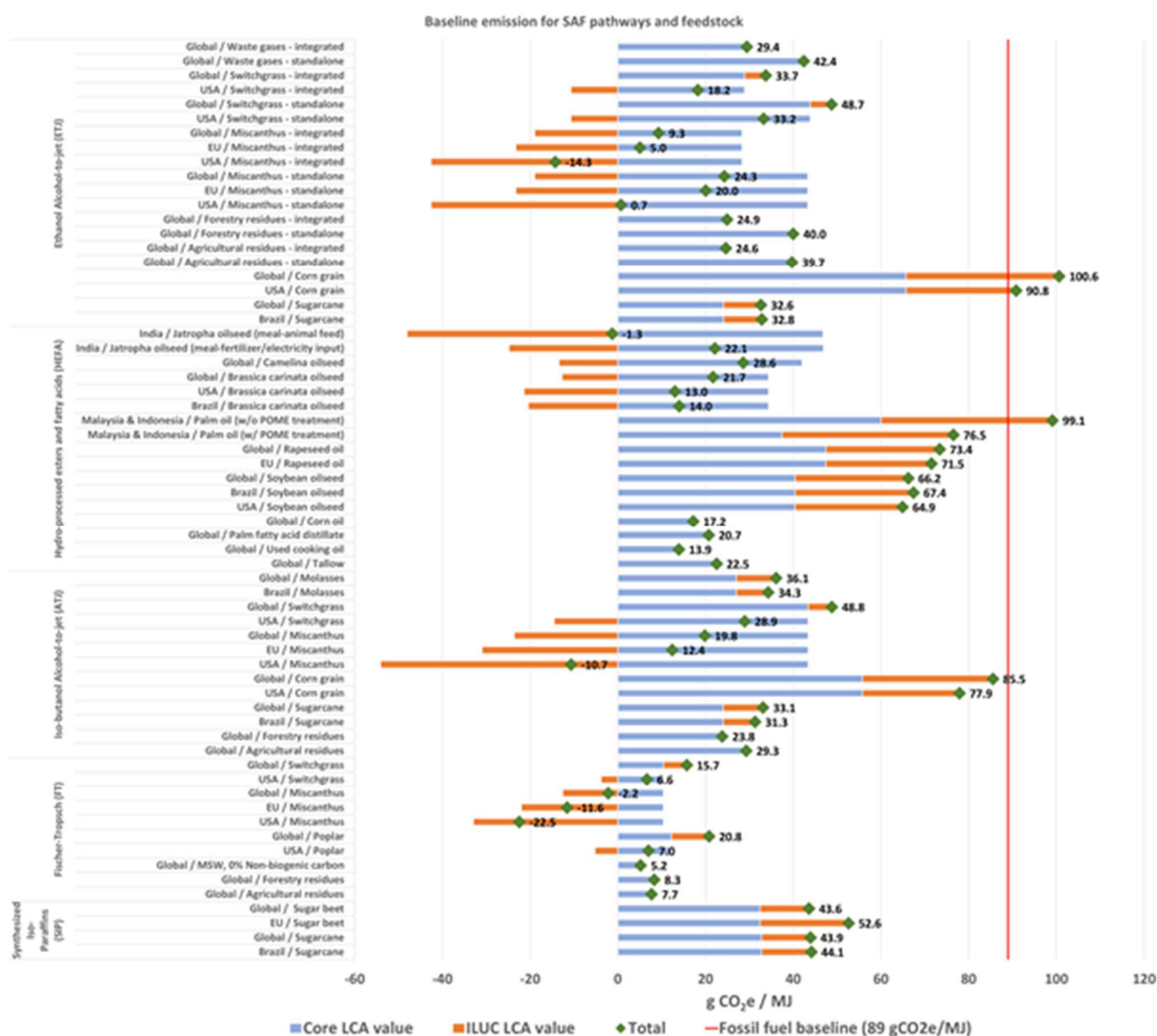


Figure 5.6. LCA emissions for CORSIA eligible SAF pathways and feedstock compared to CORSIA fossil fuel reference value (89 g CO₂e/MJ) (Ref. [45])³⁰

³⁰ 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.

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.

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].

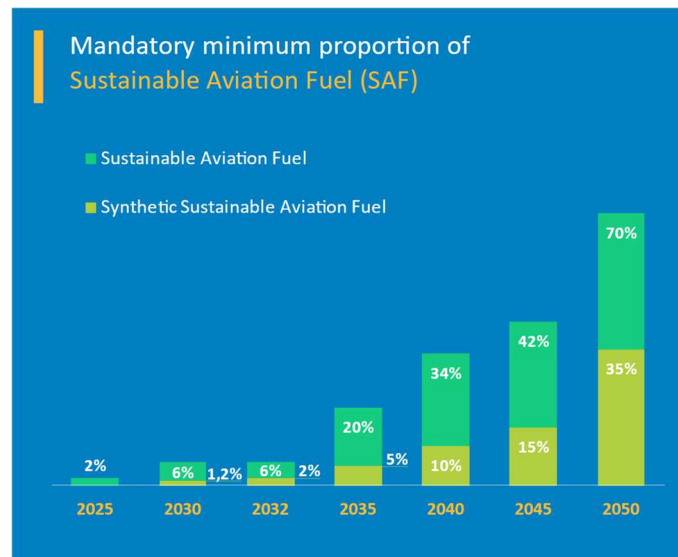
5.2.4 SAF POLICY ACTIONS

5.2.4.1 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 (Ref. [27]). 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) (Ref. [53]).

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 CO₂ emissions from international aviation by 5% in 2030 with the increased production of SAF, LCAF and other initiatives (Ref. [49]). 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.

5.2.4.2 ECAC STATES POLICY ACTIONS

Switzerland set out a SAF strategy with the goal that SAF shall contribute a minimum of 60% to net CO₂ reductions in Swiss civil aviation by 2050, contributing to the Swiss goal of reaching net-zero CO₂ 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 (Ref. [50]). 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 (Ref. [51]).

5.2.5 SAF MARKET

Global SAF production represented only 0.53% of jet fuel use in 2024, up from 0.2% in 2023 (Ref. [52] - Ref. [54]). 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.

5.2.5.1 CURRENT AND FUTURE SAF PRODUCTION CAPACITY

According to information collated with the support of ReFuelEU Aviation Member State Network (Figure 5.7), 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'.

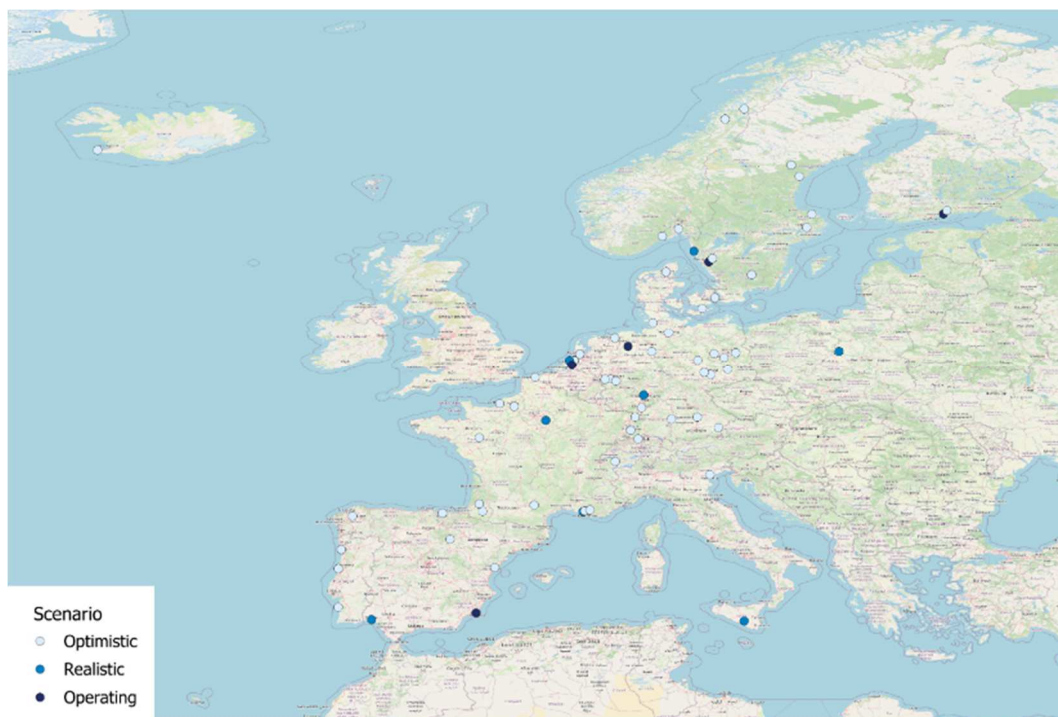


Figure 5.7. Projected EU SAF facilities in 2030 under the Optimistic scenario

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 (Ref. [55]) 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 (Ref. [56]). 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 5.8 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.

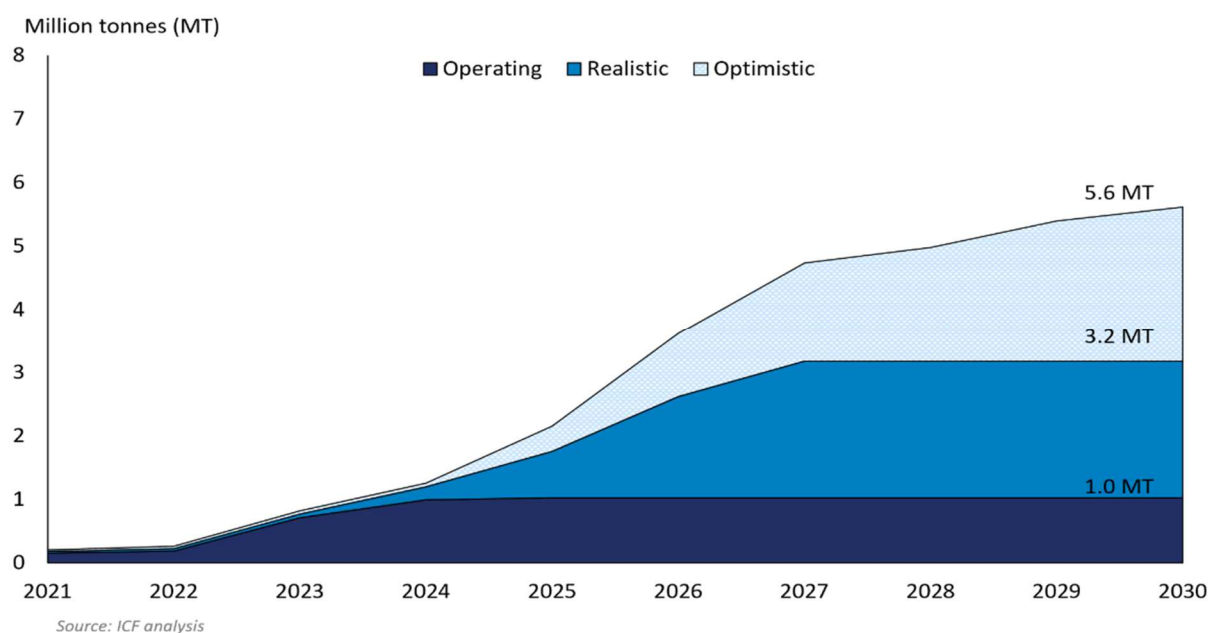


Figure 5.8. Projected EU SAF capacity in 2030 by scenario

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 (Ref. [57]). Overall, renewable energy passed 30% of the total global energy supply for the first time in 2023 (Ref. [58]). 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 (Ref. [57]).

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 facilities³¹ 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 (Ref. [55]).

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 (Ref. [59]).

5.2.5.2 CO₂ EMISSIONS REDUCTIONS

To estimate the potential CO₂ emission savings from the ReFuelEU Aviation Regulation, a

³¹ Assuming 0.3 – 0.5 Mt average SAF output per year per facility.

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_{2e}/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 (Ref. [27]). The second, more ambitious scenario assumes 80% and 90% emission reductions respectively for the two SAF types.

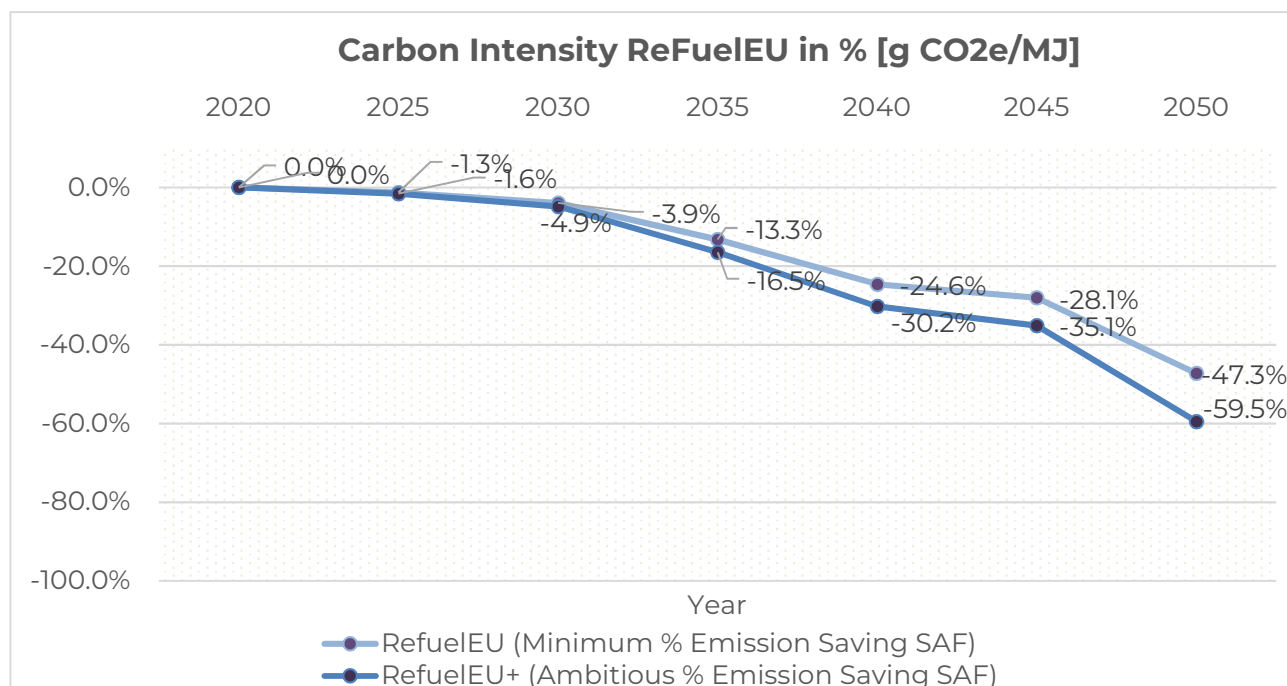


Figure 5.9. % CO_{2eq} emissions reductions from the uptake of SAF under ReFuelEU Aviation scenarios

5.2.5.3 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 (Ref. [60]).^{32, 33} When assessing the prices for ReFuelEU Aviation eligible SAF, a differentiation was made with SAF 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,

³² Price Reporting Agencies (PRA) used as data source: S&P Global Commodity Insights (Platts), Argus Media and General Index.

³³ With the density of kerosene of around 0.8 g/cm³, this results in a price of around 1.02€/l.

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 5.10 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 (Ref. [61], Ref. [62]).

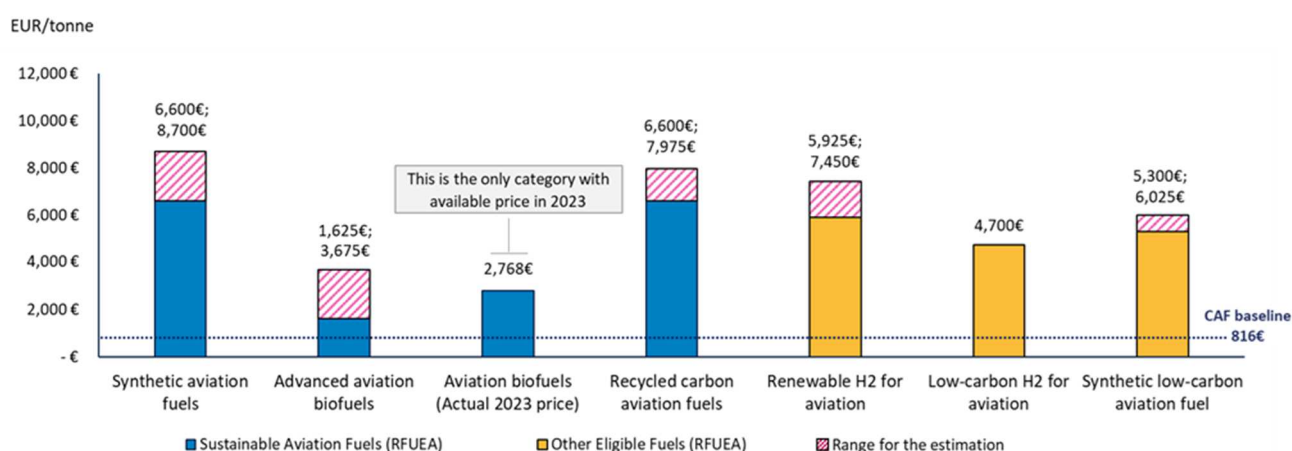


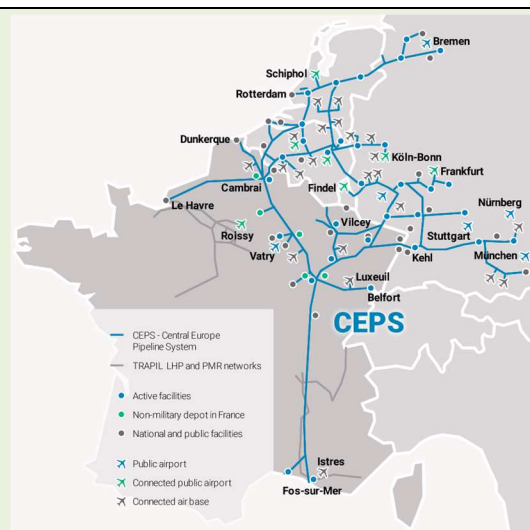
Figure 5.10. Estimated prices and production costs in 2023 for ReFuelEU Aviation eligible fuels

STAKEHOLDER ACTIONS

Central Europe Pipeline System: First delivery of SAF

The Central Europe Pipeline System (CEPS) (Ref. [63]) is the largest fuel supply system in NATO and crosses Belgium, France, Germany, Luxembourg 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 (Ref. [64])

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 CO₂ 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 (Ref. [65])

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 (Ref. [66])**

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 (Ref. [67])

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 CO₂ 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 (Ref. [68])

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 CO₂ 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.

5.2.6 LIST OF RESOURCES

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5.3 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 CO₂ emissions (9.3% less CO₂ 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 CO₂ 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 CO₂ emissions are estimated to be saved by 2026 through the Borealis Alliac 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 CO₂ 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 CO₂ savings, and these benefits are expected to increase overtime as CP1 is fully implemented.

5.3.1 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) (Ref. [69]) 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 interrelated 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 (Ref. [70]), 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 CO₂ emission per flight by 9.3% (600 kg) by 2050. A key element in achieving that goal is the deployment of Common Project One (CPI) (Ref. [93]), which facilitates service provision along optimized routes from gate to gate and thereby reduce both CO₂ and non-CO₂ 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 Manager³⁴ 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.

³⁴ 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.

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

5.3.2 SES ENVIRONMENTAL PERFORMANCE AND TARGETS

5.3.2.1 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 (Ref. [74]) 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.

5.3.2.2 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 5.11). 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 CO₂).

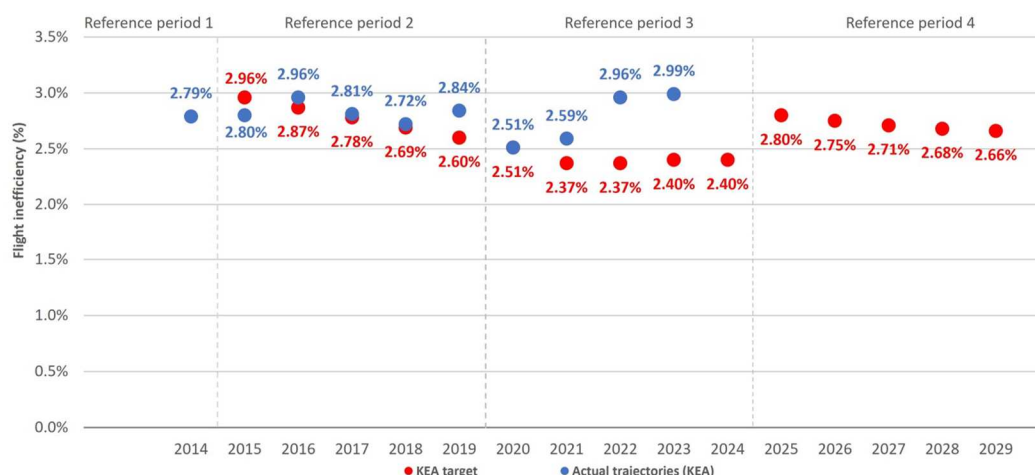


Figure 5.11. KEA horizontal en-route flight inefficiency and targets for 2014 to 2029

5.3.2.3 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)³⁵ and the shortest constrained trajectory (KES/SCR)³⁶. As with all other indicators, KEP and KES/SCR (Figure 5.12) 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.

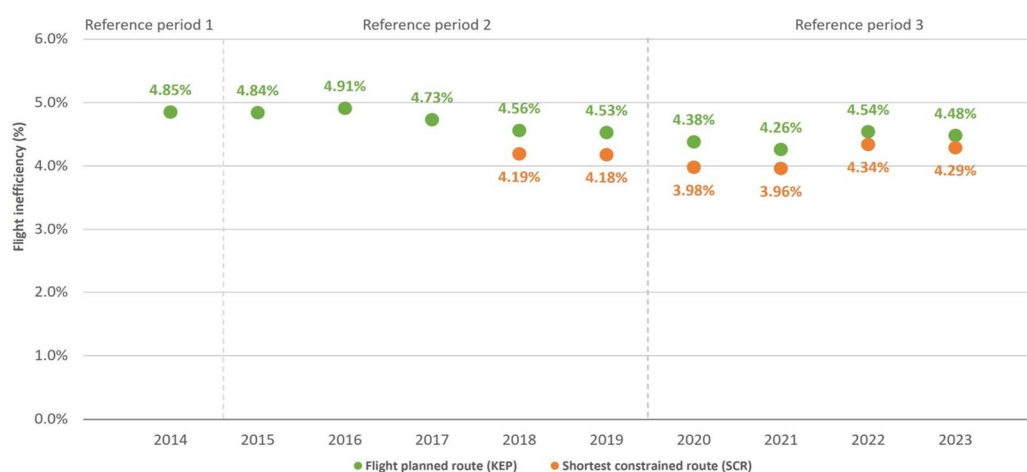


Figure 5.12. KEP horizontal en-route flight inefficiency and KES/SCR for 2014 to 2023

³⁵ 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.

³⁶ 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.

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 5.13) 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 5.13 illustrates that there is a limited capacity to accommodate CDOs during busier periods.

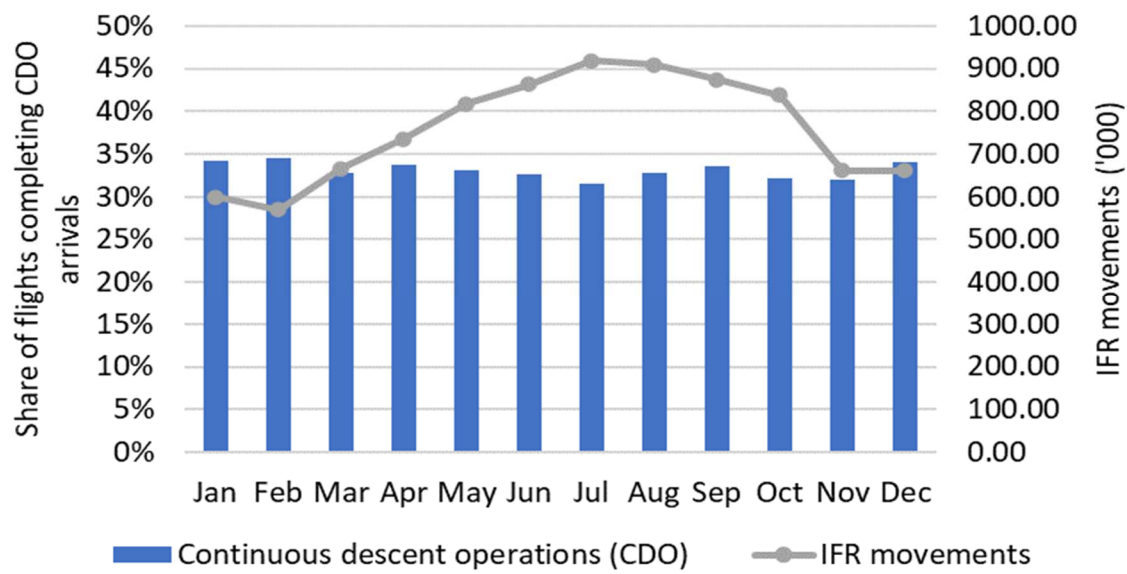


Figure 5.13. CDO vertical flight efficiency indicator for 2023

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.

5.3.2.4 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 CO₂ 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 5.14) 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.

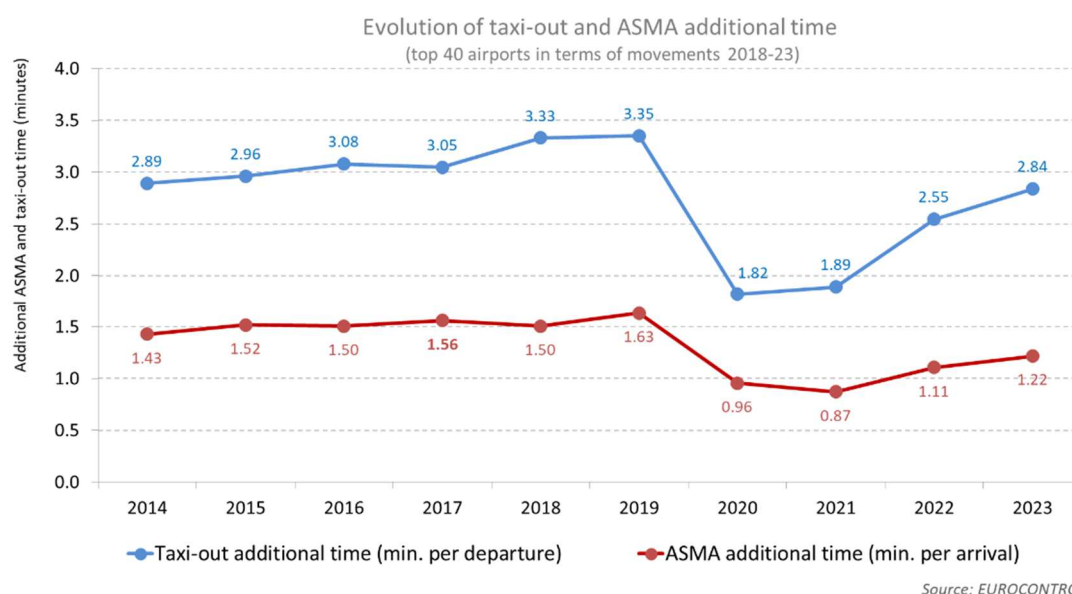


Figure 5.14. Average additional ASMA and taxi-out times for the busiest EU27+EFTA 40 airports in terms of flight movements

Significant variations exist between the top 40 busiest EU27+EFTA airports in terms of additional ASMA time (Figure 5.15).

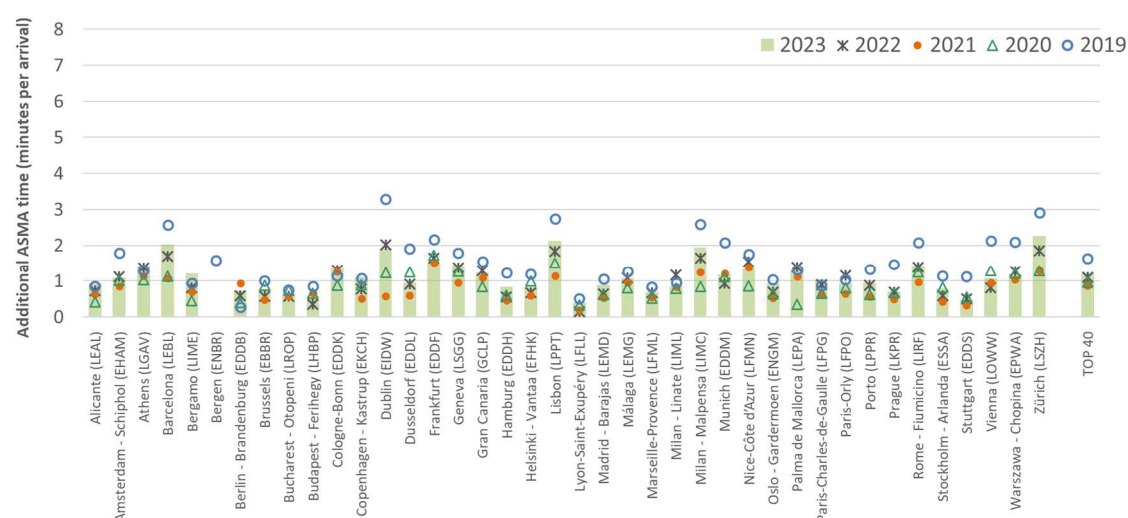


Figure 5.15. ATM related inefficiencies on the arrival flow (ASMA) at the 40 busiest EU27+EFTA airports (2019-2023)

5.3.2.5 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 (Ref. [108]) 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 (Ref. [109]).

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 (Ref. [107]). 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.

5.3.2.6 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.

5.3.3 OPERATIONAL PERFORMANCE INDICATORS

5.3.3.1 TOTAL GATE TO GATE CO₂ EMISSIONS

The total gate to gate CO₂ emissions within the EUROCONTROL area (Ref. [105]), 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 5.16 illustrates the breakdown of these CO₂ 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 CO₂.

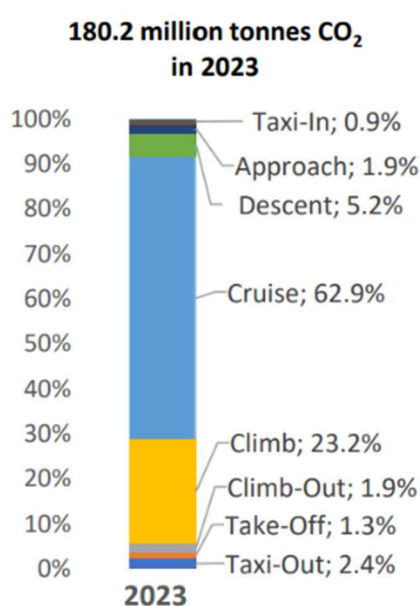


Figure 5.16. Total CO₂ emissions by flight phase within the EUROCONTROL area during 2023

5.3.3.2 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 CO₂MPASS dashboard (Ref. [97]). Figure 5.17 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.

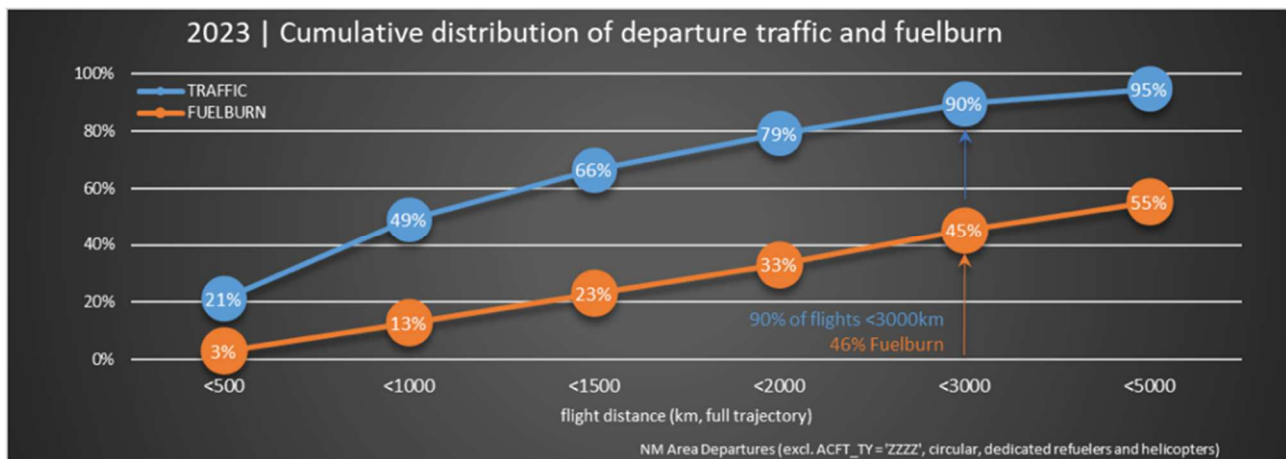


Figure 5.17. Cumulative distribution of departure and fuel burn in 2023

5.3.3.3 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 (Ref. [83]). 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.



Seamless Airspace

1.7M Nm >> 4.7M Nm
237K min >> 770K min



Cost Savings

Dependant on fuel
price fluctuation



Reduced Fuel Burn

15K t >> 30K t



Less Emissions




44K t >> 94K t CO₂

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 CO₂ emissions (Ref. [98]). 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 ₂ 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.



5.3.4 SESAR: TOWARDS THE DIGITAL EUROPEAN SKY

5.3.4.1 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 CO₂

emissions per flight. The online SESAR solutions catalogue contains technical information on these solutions and their level of deployment as reported by European states (Ref. [99]).

The current SESAR 3 Joint Undertaking (Ref. [102]) 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 CO₂ and non-CO₂ 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 (Ref. [90]).

- **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) point³⁷. This leads to long thrust descent, which is inefficient even if it does not include intermediate level-offs (Figure 5.18). 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 night-time operations. Moreover, the adoption of these dynamic routes enables agile responses to fluctuations in operational conditions.
- **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 (Ref. [89], Ref. [90]). 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 (Ref. [100]). ATM may also evolve to support the deviation of flights to avoid cruising within airspace where non-CO₂ impacts are disproportionately high (referred to as eco-sensitive volumes).

³⁷ SESAR Optimised Profile Descents Demonstration Report.

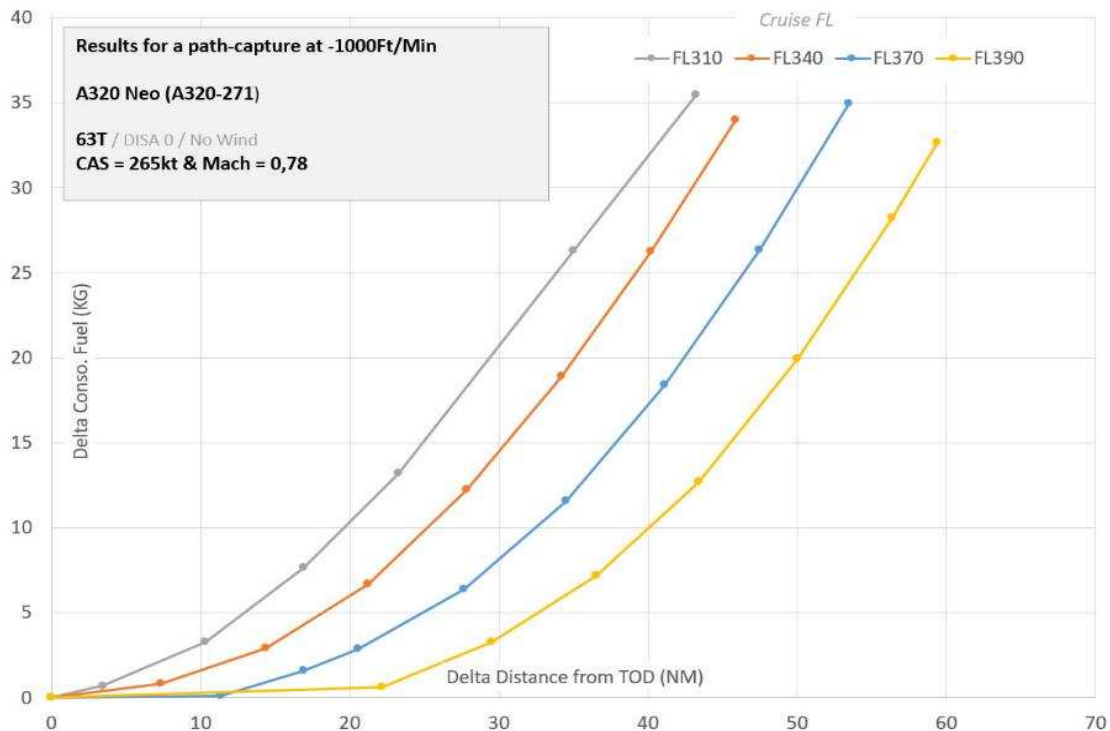


Figure 5.18. Increased fuel consumption as a function of the distance before the optimum Top of Descent that the descent phase is started, without intermediate level-offs (e.g. when a descent from cruise at FL370 is started 50nmi early, the additional fuel burn is 30 kg).

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) (Ref. [101]).

5.3.4.1.1 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.

5.3.4.2 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 5.19) aiming to reduce inefficiencies and thus generate fuel and CO₂ savings in different phases of the flight, especially cruise. The SESAR Deployment Programme (Ref. [104]) 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 (Ref. [106]) and will be a critical step towards sustainable ATM-related aviation in Europe. 65% of CP1 CO₂ 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.

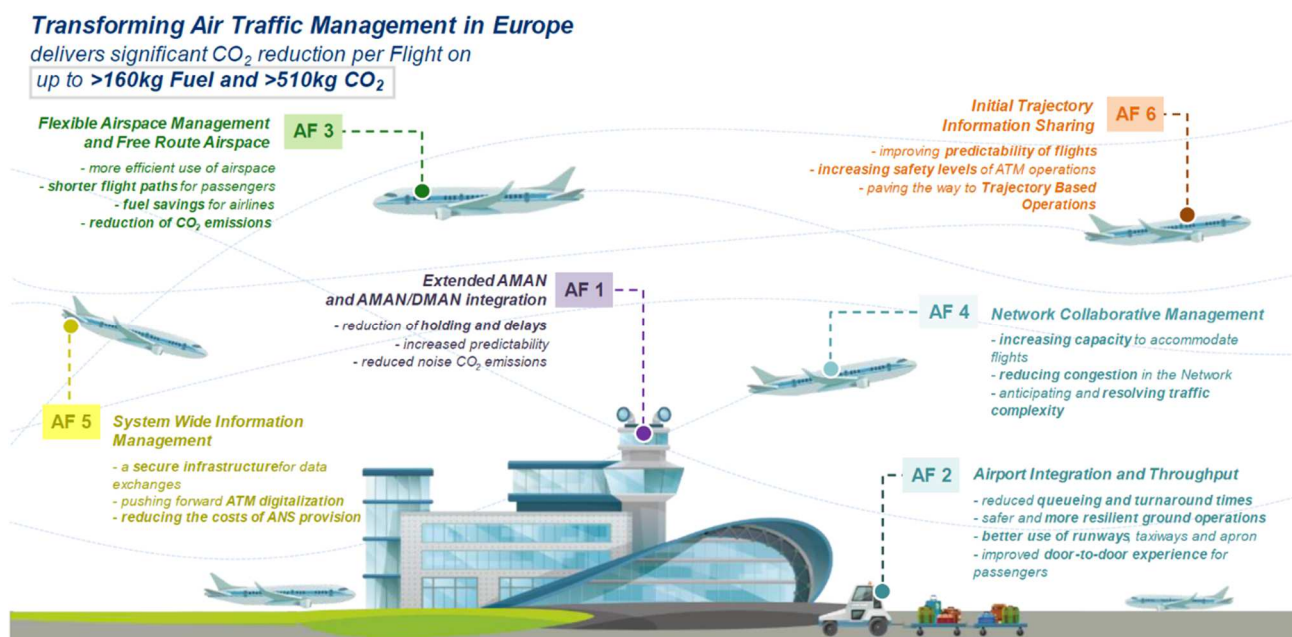


Figure 5.19. Overview of Common Projects 1 (CP1) ATM Functionalities

Table 5.6 below details the total CO₂ 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 CO₂ savings that can be expected from different sub-functionalities, and which highly depend on the specific conditions of the flight and the local situation.

CP1 Functionality		Fuel saving per flight concerned	CO2 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

Table 5.6. CO₂ savings per Common Project 1 ATM Functionality

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 CO₂ savings (Table 5.7). Furthermore, the BCR and CO₂ savings are expected to increase overtime as CP1 AF are fully implemented (Table 5.8).

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

Table 5.7. Benefit-Cost Ratio and CO₂ savings from CP1 AF implementation

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

Table 5.8. Savings in fuel and CO₂ emissions per flight in 2023 and the forecast out to 2040

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 CO₂ and non-CO₂ 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.

5.3.5 LIST OF RESOURCES

- Ref. [69] 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)
- Ref. [70] SESAR (2020), European ATM Master Plan.
- Ref. [71] EU (2019), Regulation (EU) 2019/123 of 24 January 2019 laying down detailed rules for the implementation of air traffic management (ATM) network functions.
- Ref. [72] 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.
- Ref. [73] EU (2021), Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe.
- Ref. [74] EU (2019), Regulation (EU) 2019/317 of 11 February 2019 laying down a performance and charging scheme in the single European sky.
- Ref. [75] PRB (2019), PRB Monitoring Report 2020.
- Ref. [76] EU (2005), Regulation (EC) No 2150/2005 of 23 December 2005 laying down common rules for the flexible use of airspace.
- Ref. [77] EU (2020), Regulation (EU) 2020/1627 of 3 November 2020 on exceptional measures for the third reference period (2020-2024).
- Ref. [78] EUROCONTROL (2022), Route Availability Document (RAD).
- Ref. [79] EUROCONTROL (2021), Environmental Assessment: European ATM Network Fuel Inefficiency Study.
- Ref. [80] EUROCONTROL (2019), Fuel Tankering: Economic Benefits and Environmental Impact.
- Ref. [81] ICAO (2014), Operational Opportunities to Reduce Fuel Burn and Emissions (Doc 10013).
- Ref. [82] EUROCONTROL Network Manager (2022), Optimised operational performance.
- Ref. [83] EUROCONTROL (2022), Free route airspace.
- Ref. [84] EUROCONTROL (2021), European Route Network Improvement Plan (ERNIP) - Part 2.

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- Ref. [85] EUROCONTROL (2020), European Continuous Climb and Descent Operations Action Plan.
- Ref. [86] EUROCONTROL (2022), Vertical flight efficiency at airports.
- Ref. [87] SESAR Dreams Project (2020), Initial Trajectory Information Sharing.
- Ref. [88] EUROCONTROL (2022), EUROCONTROL learning zone.
- Ref. [89] SESAR (2021), SESAR Solutions Catalogue charting progress towards the Digital European Sky.
- Ref. [90] SESAR (2020), Albatross Project.
- Ref. [91] SESAR (2021), SESAR 3 Joint Undertaking Multiannual Work Programme 2022-2031.
- Ref. [92] SESAR Deployment Manager (2022), SESAR Deployment Manager.
- Ref. [93] EU (2021), Regulation (EU) 2021/116 - Common Project 1 Regulation.
- Ref. [94] SESAR (2022), SORT - Improving runway throughput in one airport.
- Ref. [95] SESAR (2022), ADSCENSIO - ADS-C Enables and supports improved ATM operations.
- Ref. [96] SESAR (2021), Airbus - Fello'fly.
- Ref. [97] EUROCONTROL (2024), CO₂MPASS Interactive Dashboard.
- Ref. [98] EUROCONTROL (2023), Impact of strikes on European Aviation.
- Ref. [99] SESAR (2021), SESAR Solutions Catalogue.
- Ref. [100] SESAR (2024), Dynamic Route Availability Document (RAD).
- Ref. [101] SESAR (2024), Airport Operations Plan (AOP).
- Ref. [102] EU (2021), SESAR Single Basic Act.
- Ref. [103] EU (2013), SESAR Deployment Framework.
- Ref. [104] SESAR (2022), SESAR Deployment Programme 2022.
- Ref. [105] EUROCONTROL (2025), EUROCONTROL Area.
- Ref. [106] SESAR (2025), SESAR Deployment Manager.
- Ref. [107] 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
- Ref. [108] EC (2024), Commission Implementing Decision (EU) 2024/1688 of 12 June 2024 setting Union-wide performance targets for the air traffic management network for the fourth reference period from 1 January 2025 to 31 December 2029.
- Ref. [109] PRB (2024), Traffic light system for environmental performance 2023.
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5.4 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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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.

5.4.1 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 CO₂ reduction within each sector, or through trading of allowances with other economic sectors included in the EU ETS where emission reduction costs are lower.

5.4.1.1 AVIATION AND THE EU ETS

The EU decided to include aviation activities within the EU ETS in 2008 (Ref. [110]), 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)³⁸. 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 (Ref. [111]). 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 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.

³⁸ The European Economic Area includes EU27, Norway, Iceland and Liechtenstein.

- 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-CO₂ aviation effects³⁹
- 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.

5.4.1.2 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 CO₂ 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 EUAs. 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 CO₂ 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 5.20, total verified CO₂ 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 CO₂ 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 CO₂ 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 5.20).

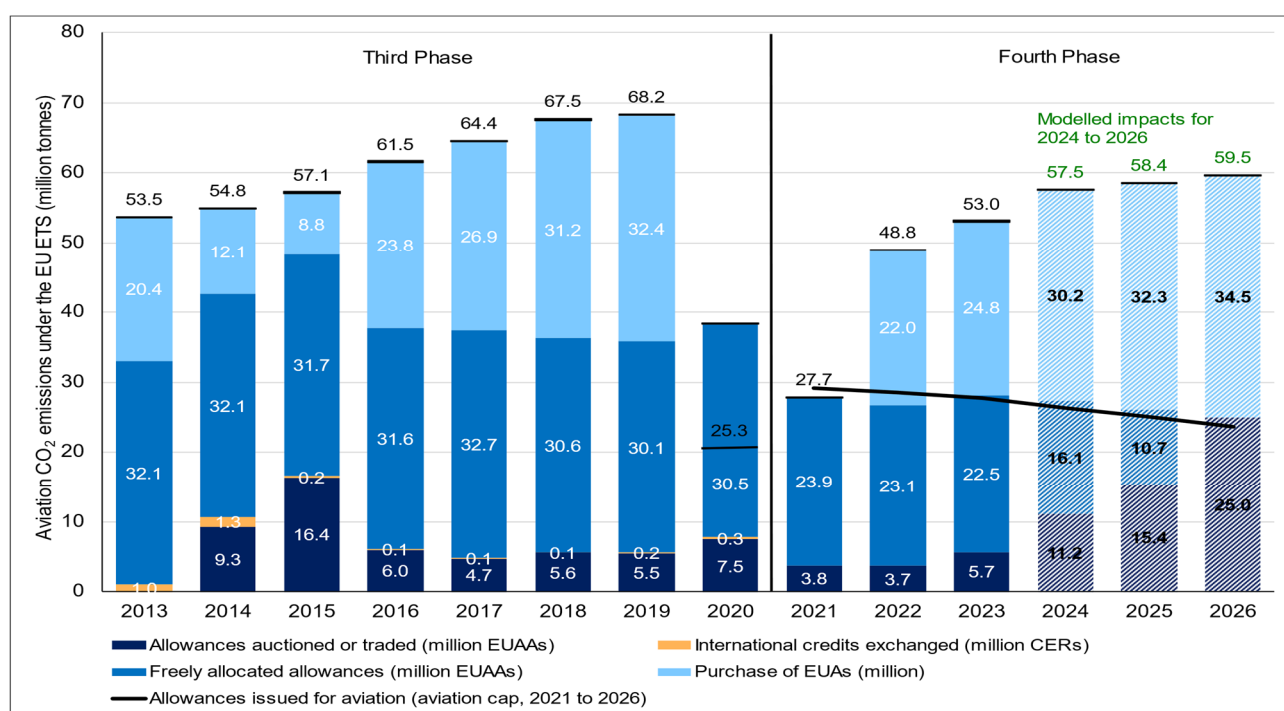


Figure 5.20. Aviation CO₂ emissions under the EU ETS in 2013-2023 and modelled impact of the revised ETS Directive for years 2024-2026, where 1 EUAA / EUA equals 1 tonne of CO₂ emissions⁴⁰ (Note: Data in the figure reflects the years in which the EUAAs were effectively released to the market. This applies especially for allowances attributable to years 2013, 2014 and 2015, which were all auctioned in 2015. The 2014 auctions of EUAAs relate to auctioning of EUAAs due to the postponement of 2012 auctions. Modelled data for years 2024-2026 from the updated AERO-MS model)

Since 2021, a gradual recovery of aviation activities has been observed: total verified aviation CO₂ emissions covered by the EU ETS in 2021, 2022 and 2023 were 27.7Mt, 48.8Mt and 53.0Mt

⁴⁰ 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.

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 CO₂ 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 5.20, the modelled CO₂ 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 ETS⁴¹.

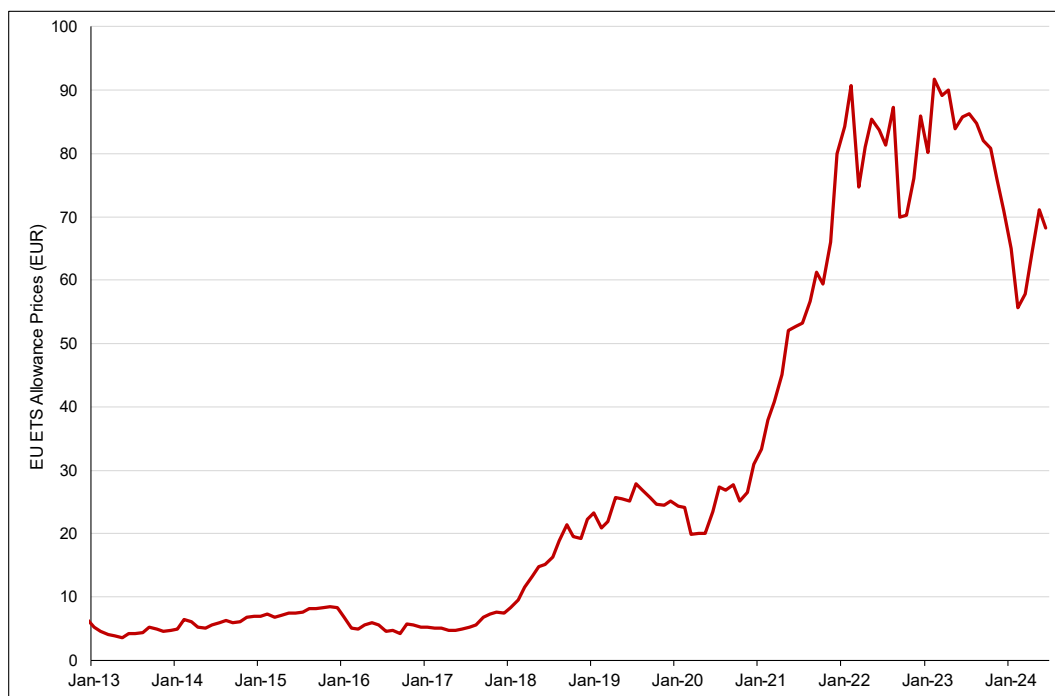


Figure 5.21. EU ETS Allowance Prices (2013-2024)

As shown in Figure 5.21, the annual average EU ETS carbon price varied between €4 and €30 per tonne of CO₂ 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 CO₂ were observed in early 2022 and again in 2023. For the period of 2024-2026, it is

⁴¹ Estimation from EASA AERO-MS model. See Appendix C for more details.

estimated that the ETS cost could represent 4-6% of airlines' total annual operating costs⁴².

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.

5.4.2 CARBON OFFSETTING AND REDUCTION SCHEME FOR INTERNATIONAL AVIATION (CORSIA)

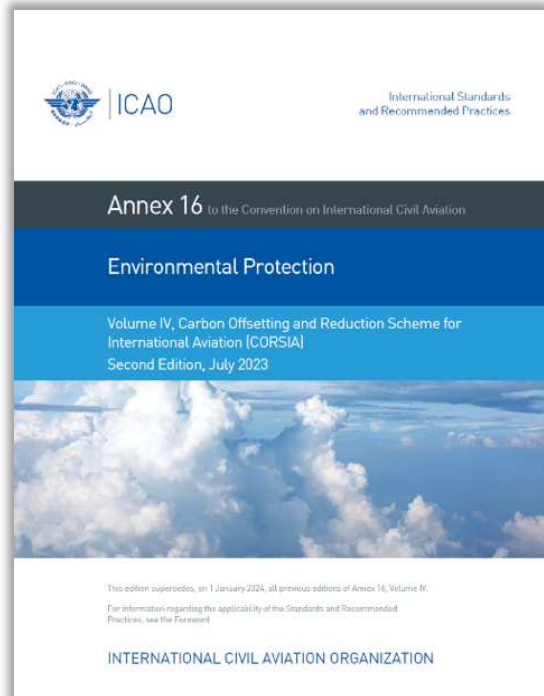
5.4.2.1 BACKGROUND

In 2016, the 39th ICAO General Assembly reconfirmed the 2013 aspirational objective of stabilising CO₂ 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 41st ICAO Assembly in 2022, following the outcome of the first CORSIA periodic review by the ICAO Council (Ref. [112]).



⁴² Estimation from EASA AERO-MS model.

CORSIA is being implemented through the associated ICAO Standards and Recommended Practices (SARPs) contained in ICAO Annex 16, Volume IV, the 1st Edition of which became applicable on 1 January 2019. In March 2023, the 2nd Edition of Volume IV was approved by the Council and became applicable 1 January 2024. There were two main sources for the 2nd Edition updates: technical amendments arising from the 12th 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.



5.4.2.2 12TH 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.

5.4.2.3 41ST 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 (Ref. [13]). 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 States⁴³. Implementation of CORSIA's monitoring, reporting and verification rules within the EU has been through the relevant ETS Regulations (Ref. [114] - Ref. [116]).

5.4.2.4 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 CO₂ emissions greater than 10, CO₂ 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 CO₂ emissions on an annual basis from 2019. The CO₂ 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% of the CO₂ 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 (Ref. [117]). The second phase applies to all ICAO Contracting States, with certain exemptions.



⁴³ 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.

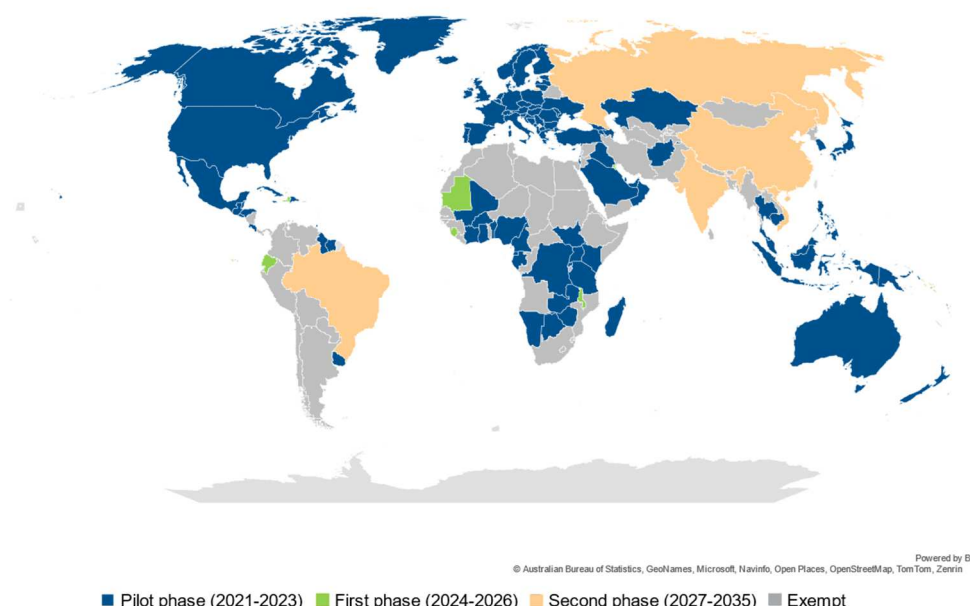


Figure 5.22. ICAO Member States participation in CORSIA offsetting in various phases

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 5.23 illustrates the reported CO₂ 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 CO₂ emissions covered by CORSIA offsetting in 2019. These baseline emissions will be re-calculated for every given year, based on the routes covered by CORSIA offsetting requirements in that given year.

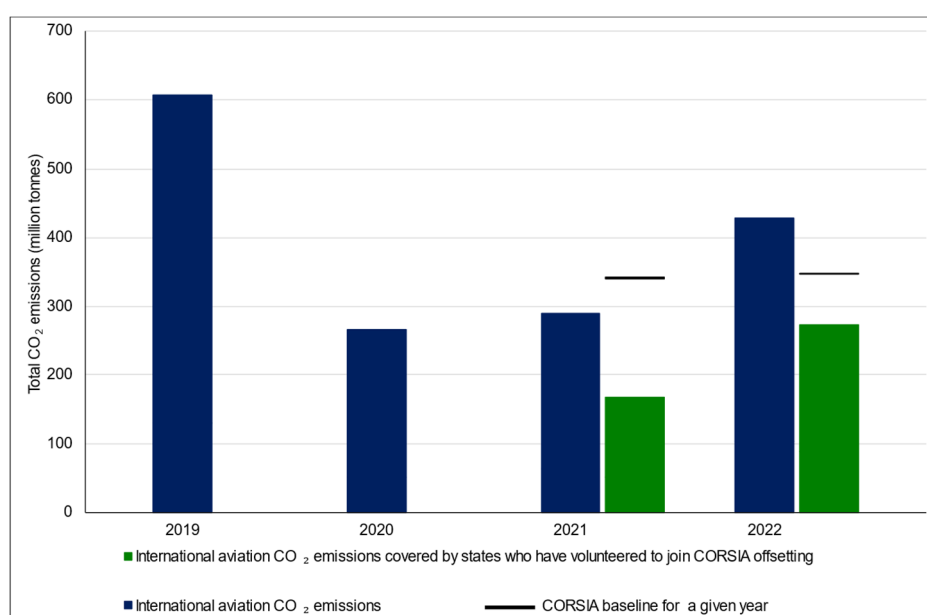


Figure 5.23. International aviation CO₂ emissions reported through the CORSIA Central Registry

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 2026⁴⁴ (Figure 5.24).

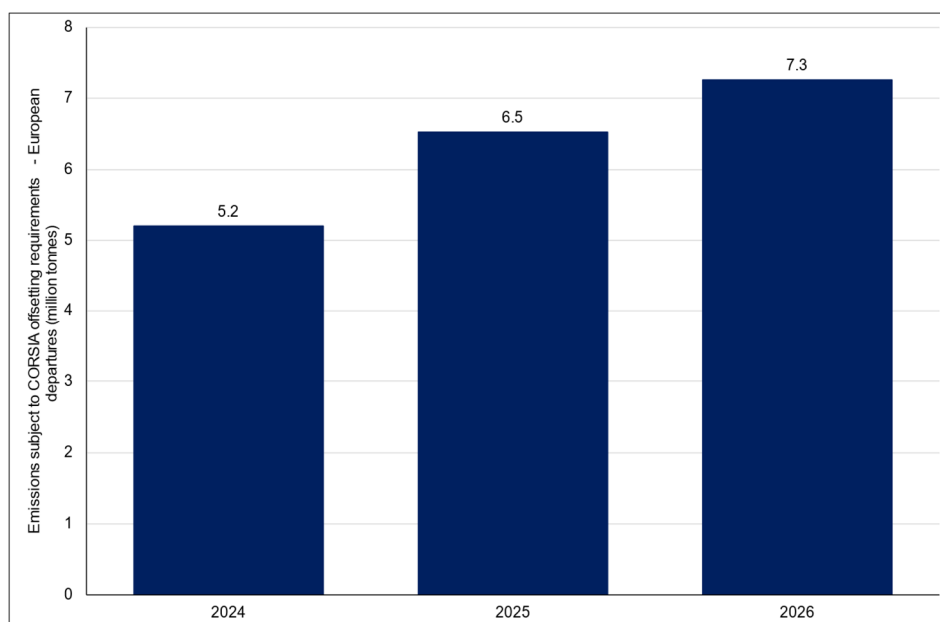


Figure 5.24. Estimated CORSIA offsetting requirements for departing flights from Europe⁴⁵

5.4.2.5 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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ avoided or reduced. In order to safeguard the environmental integrity of offset credits used under CORSIA, the emission units

⁴⁴ Estimation by EASA AERO-MS model.

⁴⁵ 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.

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_{2e} during 2020-2021 with a weighted average of \$3.08/tCO_{2eq} in 2021) (Ref. [118]). 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_{2e} emissions on a life-cycle basis compared to a reference fossil fuel value of 89.1gCO_{2e}/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 (Ref. [119]).

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 (Ref. [120]), 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 (Ref. [121]).

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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ emissions either through a fuel burn monitoring method or an estimation tool. The necessary CO₂ 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 CO₂ 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.

5.4.3 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.

5.4.3.1 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 (Ref. [122]), "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 (Ref. [123]). 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 (Ref. [124]) 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) CO₂ emissions, and 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 CO₂ 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.

5.4.3.2 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 (Ref. [125]). 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.

5.4.3.3 VOLUNTARY OFFSETTING

In recent years, some airlines have introduced voluntary offsetting initiatives aimed at compensating, partly or in full, those CO₂ 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 additional⁴⁶. 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 (Ref. [126] - Ref. [128]).

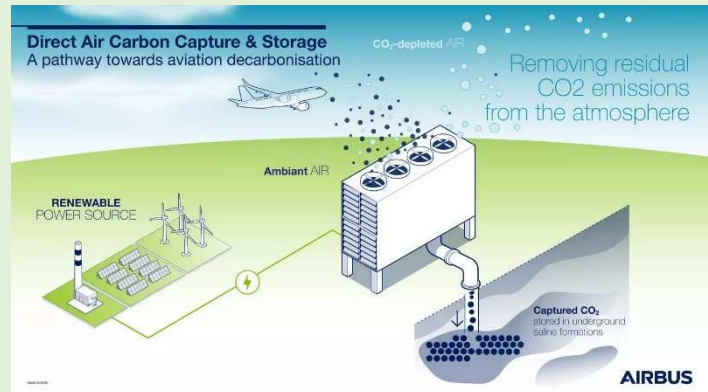
⁴⁶ "Additionality" means that the carbon offset credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate, and that exceed any greenhouse gas reductions or removals 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 (Ref. [130]). ACCO looks to support the management of the remaining and residual CO₂ 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 CO₂ per year starting in 2025. Airbus has committed to purchase 400,000 tonnes of CO₂ 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.



5.4.4 LIST OF RESOURCES

- Ref. [110] EC (2008), [Directive 2008/101/EC](#) of the European Parliament and of the Council of 19 November 2008 amending Directive 2003/87/EC so as to include aviation activities in the scheme for greenhouse gas emission allowance trading within the Community.
- Ref. [111] 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.
- Ref. [112] ICAO (2022), [Resolution A41-22](#): Consolidated statement of continuing ICAO policies and practices related to environmental protection — CORSIA.
- Ref. [113] ICAO (2024), ICAO CORSIA Implementation Elements: [CORSIA Implementation Elements \(icao.int\)](#)
- Ref. [114] 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.
- Ref. [115] EU (2018), [Implementing Regulation \(EU\) 2018/2067](#) on the verification of data and on the accreditation of verifiers pursuant to Directive 2003/87/EC.
- Ref. [116] 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.

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- Ref. [117] ICAO (2024), [CORSIA States for Chapter 3 State Pairs](#).
- Ref. [118] Ecosystem Marketplace (2024), [CORSIA Carbon Market Data](#).
- Ref. [119] ICAO (2024), [CORSIA Eligible Emissions Units](#).
- Ref. [120] EC (2022), [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a Union certification framework for carbon removals](#).
- Ref. [121] Government of Guyana (2024), [World's First Carbon Credits for Use in UN Airline Compliance Programme, CORSIA](#).
- Ref. [122] 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](#).
- Ref. [123] 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](#).
- Ref. [124] 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](#).
- Ref. [125] EC (2021), [Proposal for a COUNCIL DIRECTIVE restructuring the Union framework for the taxation of energy products and electricity](#).
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- Ref. [127] [Washington Post \(2023\), Airlines want you to buy carbon offsets. Experts say they're a 'scam.' - The Washington Post](#).
- Ref. [128] 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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5.5 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 CO₂ 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% CO₂ emissions reductions in Scopes 1 and 2, a verified carbon footprint and a Stakeholder Partnership Plan underpinning the commitment of net zero CO₂ 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 CO₂ emissions by 2050 including the aim to achieve a 5% reduction of CO₂ 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 CO₂ 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.

5.5.1 AIRPORT MEASURES

5.5.1.1 AIRCRAFT OPERATIONS

5.5.1.1.1 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 (Ref. [131]) 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.

5.5.1.1.2 Green Operational Procedures

Building on the previous ALBATROSS research project (Ref. [132]), 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 (Ref. [133]). This includes the Green Apron Management demonstration, which uses sensors and artificial intelligence for more predictable and efficient aircraft handling during airport stopovers.



5.5.1.1.3 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 5.25). 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.

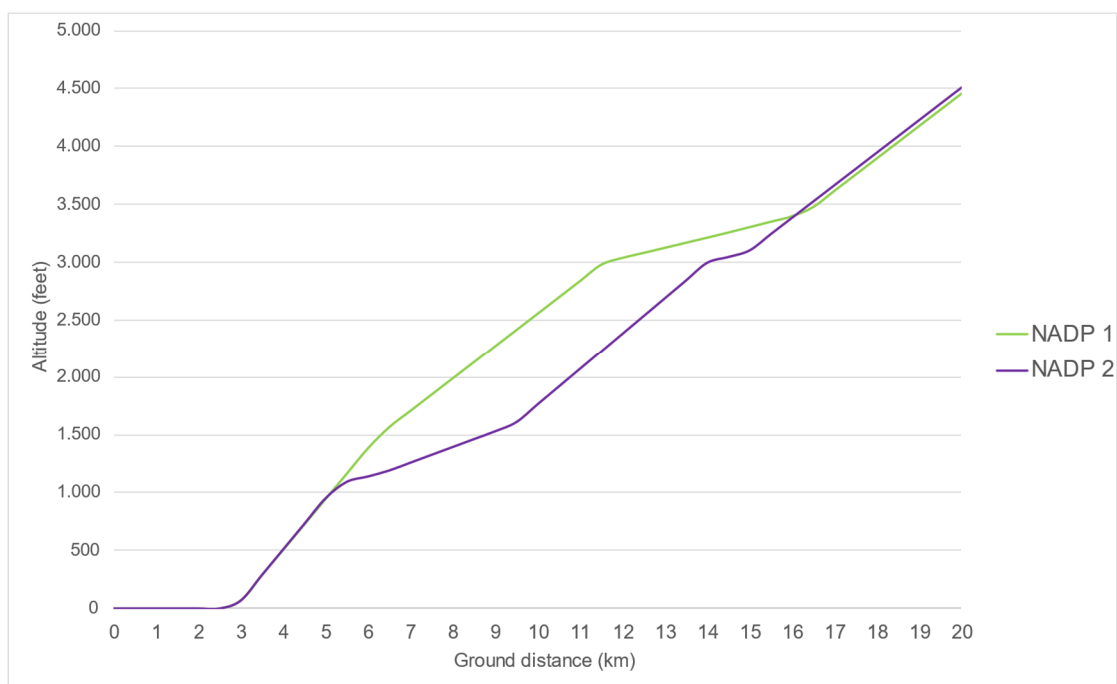


Figure 5.25. Example of the difference between NADP 1 and 2 for a wide body aircraft with thrust reduction at 1,000ft.

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.

5.5.1.1.4 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 (Ref. [134]).



The Concept of Operations (CONOPS) addresses the potential fuel burn reductions of several sustainable taxiing solutions, which could be up to 400kg CO₂ 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.

5.5.1.2 AIRPORT INFRASTRUCTURE

Various EU research projects, including TULIPS (Ref. [135]), OLGA (Ref. [136]) and STARGATE (Ref. [137]), are currently demonstrating innovative environmental solutions at airports, which can be replicated on a European scale.

5.5.1.2.1 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 (Ref. [138]).

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 (Ref. [139]). 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 (Ref. [140]).

5.5.1.2.2 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 (Ref. [141]). 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.

5.5.1.2.3 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 (Ref. [142]). 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.

5.5.1.2.4 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 5.9). A detailed overview of these types of SAF incentive initiatives by European airports has been compiled by ACI EUROPE (Ref. [143]).

Supply Chain Investment
<ul style="list-style-type: none"> • Support airlines on logistic issue to facilitate the delivery of SAF. • Engage in joint negotiations with SAF suppliers, carriers and other airports to develop • SAF projects. • Invest in SAF production facilities.
Raise Awareness
<ul style="list-style-type: none"> • Inform passengers and corporations on opportunities to purchase SAF for their flights and/or support SAF projects to compensate for their CO₂ emissions.
Financial Incentives
<ul style="list-style-type: none"> • 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).
Policy Engagement
<ul style="list-style-type: none"> • 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.

Table 5.9. Overview of airport initiatives to support the uptake of SAF

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 (Ref. [144]).

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 (Ref. [145]), the Alternative Fuels Infrastructure Regulation (Ref. [146]) and their 'financial arm' in the form of the Connecting Europe Facility (Ref. [147]).

Trans-European Transport Network (TEN-T)

The revision of the TEN-T Guidelines (Ref. [148]) 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 (Ref. [149], Ref. [150]). 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.

5.5.2 NET ZERO CO₂ EMISSIONS

The ACI EUROPE Sustainability Strategy was launched in 2019 (Ref. [151]), which included the Net Zero Resolution that has been updated in 2024 (Ref. [152]). 303 European airports have since committed to net zero⁴⁷ carbon emissions from airport operations within their control by 2050 and provided a roadmap detailing how this will be achieved (Ref. [153]).



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 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 (Ref. [154]) and this was followed in 2023 with guidance on developing Net Zero carbon roadmaps (Ref. [155]).

⁴⁷ Net zero carbon dioxide (CO₂) emissions are achieved when CO₂ emissions from human activities are balanced globally by CO₂ removals from human activities over a specified period. Net zero CO₂ emissions are also referred to as carbon neutrality.

STAKEHOLDER ACTIONS

Airport Carbon Accreditation Programme



The Airport Carbon Accreditation (ACA) programme (Ref. [156]) was launched in 2009 by the Airports Council International Europe and, as of June 2024, now includes 564 airports on a global basis. The 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 CO₂ 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 5.26).

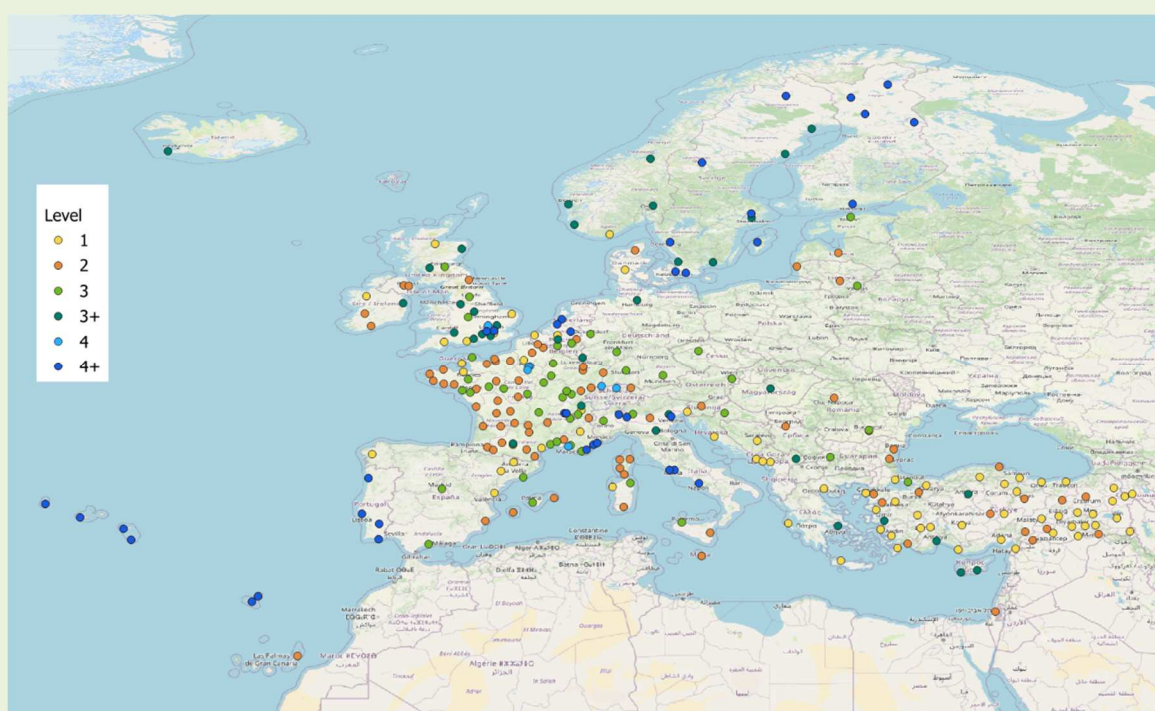


Figure 5.26. European airports participating in the ACA programme

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 (Transformation⁴⁸) and 4+ (Transition⁴⁹) have been added as interim steps

⁴⁸ 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.

⁴⁹ All Levels 1 to 4 plus offsetting of the residual carbon emissions over which the airport has control.

towards the long-term goal of achieving net zero CO₂ 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 CO₂ emissions reductions in Scopes 1 and 2 in alignment with the ISO Net Zero Guidelines, as well as commit to achieving net zero CO₂ 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 (Ref. [157]) 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 (Ref. [158]), 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 CO₂ 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.

The carbon emission per passenger travelling through European airports at all levels of Airport Carbon Accreditation has increased to **1.8 kg CO₂/passenger** (Figure 5.28). A total reduction in Scope 1 and 2 emissions compared to a three-year rolling average⁵⁰ of **452,893 tonnes of CO₂** for all accredited airports in Europe was also reported (Figure 5.27). This represents about 20% reduction compared to the three-year rolling average.

⁵⁰ 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.

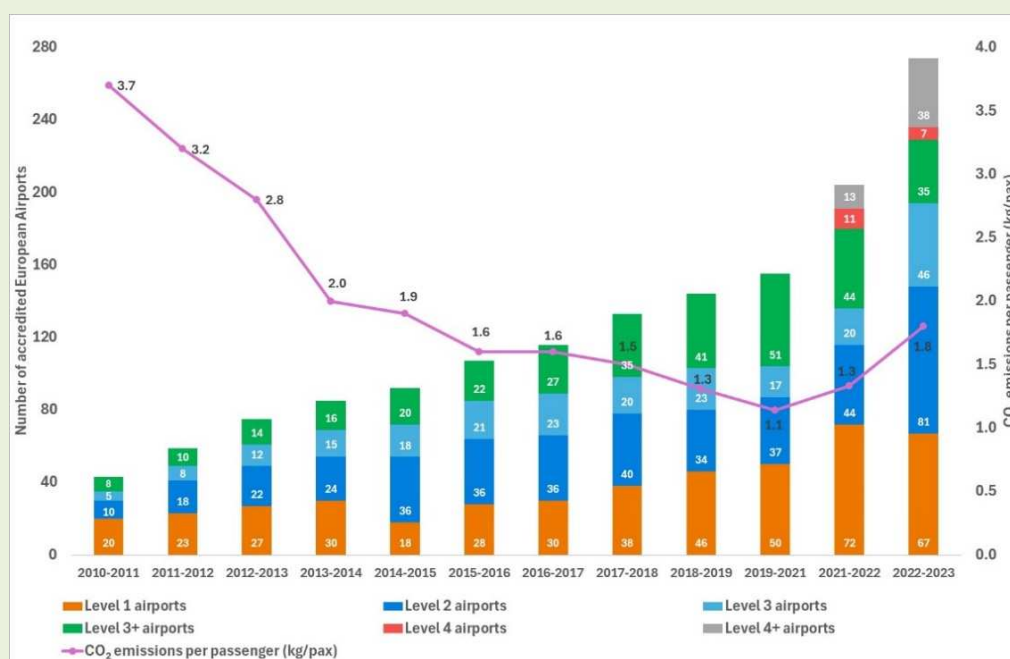


Figure 5.27. Increasing number of accredited European airports and decreasing CO₂ emissions per passenger

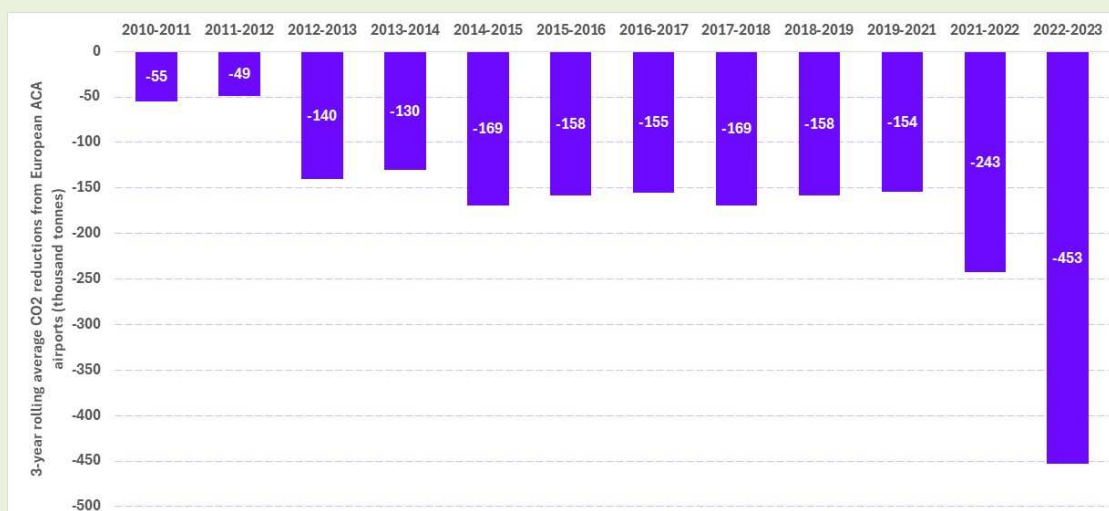


Figure 5.28. Scope 1 and 2 emissions reductions in airport CO₂ emission

Further developments in the ACA programme are envisaged in 2025 that will focus on the efforts of airport supply chains to reduce their CO₂ emissions.

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 (Ref. [159]) 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 CO₂



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' (Ref. [160]), 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% CO₂ 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 (Ref. [161]). This tool uses Carbon Disclosure Project (Ref. [162]) 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 (Ref. [163]).

5.5.3 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 (Ref. [164]). The contribution of the European Commission to these programmes amounts to €56.5 million⁵¹, 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.

⁵¹ Some of the projects covered environment among other activities but were not fully dedicated to environment matters.

5.5.3.1 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.

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 TIITISI 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."



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.

5.5.3.2 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 3rd 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 (Ref. [165]). 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 (Ref. [166] - Ref. [172]). 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 CO₂ 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.

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."



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.

5.5.3.3 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 (Ref. [173]). 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).

5.5.4 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 (Ref. [174]), 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 CO₂ 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.

5.5.5 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 participants⁵² and initiatives being

⁵² 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.

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.

5.5.6 LIST OF RESOURCES

- Ref. [131] EU (2018), [Regulation 2018/1048](#) laying down airspace usage requirements and operating procedures concerning performance based navigation.
- Ref. [132] SESAR (2021), [ALBATROSS](#) research project.
- Ref. [133] SESAR (2023), [HERON](#) research project.
- Ref. [134] EUROCONTROL (2024), [Sustainable Taxiing Operations](#) – Concept of Operations and Industry Guidance.
- Ref. [135] EU (2025), [TULIPS](#) Horizon 2020 research project.
- Ref. [136] EU (2025), [OLGA](#) Horizon 2020 research project.
- Ref. [137] EU (2025), [STARGATE](#) Horizon 2020 research project.
- Ref. [138] Schiphol (2024), [Emissions Free by 2030](#).
- Ref. [139] Fraport (2024), [Frankfurt Airport Vertical Photovoltaic System](#).
- Ref. [140] Fraport (2024), [Frankfurt Airport Using Charging Infrastructure Bidirectionally](#).
- Ref. [141] EU (2024), [GOLIAT](#) (Ground Operations of Liquid hydrogen Aircraft) research project.
- Ref. [142] EASA (2024), [Guidance for the implementation of the new Aircraft Classification Rating \(ACR\) – Pavement Classification Rating \(PCR\) method for the EASA Member States](#).
- Ref. [143] ACI-E (2024), [European airports' initiatives to incentivise SAF](#).
- Ref. [144] EU (2025), [ALIGHT](#) Horizon 2020 research project.
- Ref. [145] EU (2025), [Trans European Transport Network \(TEN-T\)](#).
- Ref. [146] EU (2023), [Alternative Fuels Infrastructure Regulation](#).
- Ref. [147] EU (2025), [Connecting Europe Facility](#).
- Ref. [148] 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.

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- Ref. [149] EC (2023), [Transport infrastructure: over EUR 352 million of EU funding to boost greener mobility](#).
- Ref. [150] EU (2024), [CEF Transport Alternative Fuels Infrastructure Facility \(AFIF\) call for proposal](#).
- Ref. [151] ACI-E (2020), [Sustainability Strategy for Airports](#).
- Ref. [152] ACI-E (2024), [What is Net Zero? – ACI-E Net Zero Resolution 2024](#).
- Ref. [153] ACI-E (2022), [Repository for airport net zero CO₂ roadmaps](#).
- Ref. [154] ACI-E (2022), [Guidance on Airports' Contribution to Net Zero Aviation](#).
- Ref. [155] ACI-E (2023), [Developing an Airport Net Zero Carbon Roadmap](#).
- Ref. [156] ACI-E (2022), [Airport Carbon Accreditation programme](#).
- Ref. [157] ACA (2023), [Offset Guidance Document](#).
- Ref. [158] GHG Protocol (2025), [Scope 2 and 3 Calculation Guidance](#).
- Ref. [159] Air Cargo Belgium (2024), [Digital Green Lane](#).
- Ref. [160] STARGATE (2025), [Digital Twin project](#).
- Ref. [161] Travel Smart (2025), [Emissions Tracker](#).
- Ref. [162] CDP (2025), [Carbon Disclosure Project](#).
- Ref. [163] Travel Smart (2025), [Case Studies](#) of company best practices.
- Ref. [164] ICAO (2024), [ACT-CORSIA](#) and [ACT-SAF](#).
- Ref. [165] ICAO (2023), [ICAO Global Framework for Sustainable Aviation Fuels \(SAF\), Lower Carbon Aviation Fuels \(LCAF\) and other Aviation Cleaner Energies](#).
- Ref. [166] ICAO (2018), [Kenya](#) – Feasibility study on the use of SAF
- Ref. [167] ICAO (2018), [Trinidad and Tobago](#) – Feasibility study on the use of SAF
- Ref. [168] ICAO (2018), [Dominican Republic](#) – Feasibility study on the use of SAF.
- Ref. [169] ICAO (2018), [Burkina Faso](#) – Feasibility study on the use of SAF.
- Ref. [170] ICAO (2023), [Zimbabwe](#) – Feasibility study on the use of SAF.
- Ref. [171] ICAO (2023), [Cote d'Ivoire](#) – Feasibility study on the use of SAF.
- Ref. [172] ICAO (2023), [Rwanda](#) – Feasibility study on the use of SAF.
- Ref. [173] CAAP (2023), [award of ISO14001 Certificate](#) to Iloilo International Airport
- Ref. [174] EU (2022), [Global Gateway flagship projects](#).
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SECTION 2

National Actions in Italy



6 NATIONAL SECTION: DOCUMENT STRUCTURE AND CONTACT INFORMATION

As reported in the ICAO “Guidance on the Development of State Action Plans on CO₂ Emissions Reduction Activities” (Ref. [175]), to meet the provisions of Resolution A41-21, an Action Plan should contain the following five elements:

1. Contact information of the Focal Point, alternate Focal Point (if applicable) and any other person(s) responsible for the compilation and submission of the Action Plan;
2. Baseline Scenario: this scenario refers to the case in which no actions are taken to mitigate CO₂ emissions due to international aviation and should be defined by analysing the historic fuel consumption, CO₂ emissions and traffic data, and projecting into the future (at least 2050) what would happen in the absence of the measures contained in the Action Plan;
3. Measures selected to mitigate CO₂ emissions from international aviation, that should be described by distinguishing between those that are already in place and those that are planned for future implementation;
4. Expected results, in terms of impact of the selected measures on the baseline scenario. Therefore, this scenario will show annual fuel consumption, CO₂ emissions and traffic data after the implementation of mitigation measures from the first implementation year to at least 2050;
5. A description of any specific needs (for example, financial, technological or capacity building) for the implementation of selected future mitigation measures should be described, if applicable.

The *National Section* of this Action Plan has been elaborated by Enac to respond at best to the given requirements, through a workplan based on the engagement of the stakeholders active in Italy from to the 3 most involved categories: Air Navigation Service Providers (ANSPs), Aircraft Operators (AOs) and Airport Managing Bodies (AMBs).

The structure of the *National Section* follows the above-mentioned content list, with 5 chapters providing the following information:

- Chapter 6 provides an overview of the document, describing the context and the roles of the institutions involved. The contact information of the Focal Point and other persons responsible for the submission of the Action Plan are reported at the end of this Chapter;
- Chapter 7 reports information and data concerning two baseline scenarios, since both the methodologies to account for the CO₂ emissions from international flights reported in 0 have been applied: the ICAO methodology, in which CO₂ emissions are reported for international flights operated by aeroplane operators attributed to that State, and the IPCC⁵³ methodology, according to which each State reports the CO₂ emissions from all international flights departing from all aerodromes located in the State or its territories. This

⁵³ Intergovernmental Panel on Climate Change (United Nation)



latter methodology has been included to have a common approach with the one adopted for the European States' Action Plan according to the EU/ECAC guidelines (Ref. [176]).

- Chapter 8 reports qualitative and quantitative information concerning the mitigation measures provided by the stakeholders participating to the initiatives launched by Enac:
 - a. preliminary survey on in-place and planned CO₂ emissions mitigation measures taken from the ICAO “basket of measures” (see Appendix);
 - b. data collection on expected fuel savings from mitigation measures;
- Chapter 9 shows how the data on expected fuel savings have been treated and aggregated, both according to ICAO e IPCC attribution methodology, in order to define the possible scenarios resulting from the introduction of the mitigation measures;
- Chapter 10 provides an overview of the needs identified in the context of the national SAF roadmap (Ref. [180]).

6.1 CONTACT INFORMATION

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7 BASELINE SCENARIOS

According to the ICAO Guidance (Ref. [175]), the section of the State Action Plan dedicated to the so-called baseline scenario, i.e. the CO₂ emissions projection to 2050 without any mitigation action, should include the following contents:

- international and domestic flights must be differentiated. In this regard, States shall use the definitions for international and domestic flights provided in Annex 16, Volume IV;
- detailed information should be provided related to the baseline scenario estimation methodology;
- annual historical fuel consumption, CO₂ emissions and traffic data from international aviation from the latest available year(s) should be collected and reported;
- in the absence of action (i.e. without implementation of selected mitigation measures), annual future fuel consumption, CO₂ emissions and traffic data should be projected for each year up to at least 2050;
- projected future fuel consumption, CO₂ emissions and traffic data should be reported in a table for each year up to at least 2050 (graphical representation is optional).

7.1 METHODOLOGY

International and domestic flights have been differentiated according to the ICAO Guidance § 3.2 (Ref. [175]) and, as anticipated, both the ICAO ("State of Registry") and IPCC ("State of Origin") attribution methods have been adopted.

§ 3.2 DIFFERENTIATING BETWEEN INTERNATIONAL AND DOMESTIC EMISSIONS

For the purposes of their Action Plans, States shall use the definitions of international and domestic flights as contained in Annex 16 — Environmental Protection, Volume IV — Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), Part II, Chapter 1, 1.1.2

- **International flight:** the operation of an aircraft from take-off at an aerodrome of a State or its territories, and landing at an aerodrome of another State or its territories.
- **Domestic flight:** the operation of an aircraft from take-off at an aerodrome of a State or its territories, and landing at an aerodrome of the same State or its territories.

There are following two main methodologies to account for the CO₂ emissions from international flights:

- **ICAO methodology:** each State reports the CO₂ emissions from all international flights, which are operated only by aeroplane operators attributed to the State; the attribution of an aeroplane operator to a State shall be determined as per Annex 16, Volume IV, Part II, Chapter 1, 1.2;
- **IPCC methodology:** each State reports the CO₂ emissions from all international flights departing from all aerodromes located in the State or its territories.

In order to collect historical fuel consumption, CO₂ emissions and international aviation traffic data, several data sources have been used. These are:

- ICAO: Air Transport Statistical Results and other materials on the Action Plan on Emissions Reduction (APER) Portal



- ENAC: domestic and international traffic statistics (Ref. [182]), also published on a yearly basis by the Ministry of Infrastructure and Transport as part of the CNIT54 report;
- MASE (Italian Ministry of Environment and Energy): SISEN (Information System for National Energy Statistics) platform, where data about sales to the internal market of the major oil products are updated on a monthly basis (Ref. [181]);
- Additional information from Annual Emission Reports (AERs) submitted by Italian aircraft operators to meet CORSIA and ETS requirements.

As Table 7.1 shows, the data collected concern the amounts of fuel supplied and burnt, as well as traffic data in terms of RTK (Revenue Tonne Kilometres), RPK (Revenue Passenger Kilometres) and number of passengers.

	MASE	ICAO							ENAC
	Aviation Fuels Supply [k tons]	Jet-Fuel Burnt [k tons]		RTK [M tons km]			RPK [M km]		Passengers (Dep. + Arr.) [M]
	Tot	Int	Int.IT	Tot.IT	Int.IT	Int	Tot.IT	Int.IT	Int
2010	3 973	3 014	1 370		4 049	9 770			77.1
2011	3 584	3 092	1 404		4 276	10 060			73.5
2012	3 782	3 129	1 367		4 030	10 141			79.3
2013	3 874	3 125	1 300		3 793	10 090			78.6
2014	3 773	3 335	1 310		3 783	10 899			85.6
2015	3 598	3 165	1 094		4 030	10 374			86.8
2016	3 634				4 897				92.0
2017	3 767				5 500				97.9
2018	3 999				5 634				104.0
2019	4 298			6 481	5 803		52 030	45 212	112.7
2020	4 586			2 125	1 866		11 396	8 956	120.8
2021	4 745			1 398	1 303		2 491	1 904	127.7
2022	1 598			3 647	3 233		20 725	16 941	27.7
2023	2 047								38.3
Notes				RTK = Revenue Tonne Kilometers					
Air Transport Statistical Results				RPK = Revenue Passenger Kilometers					
Data from APER portal				Tot = ref. to domestic and international traffic					
k = thousands				Int = ref. to international traffic					
M = millions				.IT = ref. to traffic generated by AOs registered in Italy					

Table 7.1. Data collected from multiple sources

Data in Table 7.1 refers to one or more of the following cases, in which domestic and international flights follow the definition provided by ICAO Doc. 9988 §3.2:

⁵⁴ Conto Nazionale delle Infrastrutture e dei Trasporti

- “Tot” refers to the total traffic generated by both domestic and international flights with Italy as “State of Origin” and without any differentiation on the “State of Registry” of the aircraft operators;
- “Int” refers to international flights with Italy as “State of Origin” and without any differentiation on the “State of Registry” of the aircraft operators;
- “.IT” refers to the air traffic generated by aircraft operators with Italy as “State of Registry”.

Therefore, the following equivalences can be identified in the definitions:

- Int = international flights that can be attributed to Italy according to IPCC methodology;
- Int.IT = international flights that can be attributed to Italy according to ICAO methodology.

7.1.1 ICAO ATTRIBUTION METHOD

The workflow adopted to define the baseline scenario according to ICAO method is described here below:

- as Table 7.1 shows, the data - made available by ICAO - for AOs registered in Italy are RTK for the period 2010-2022 and fuel burnt for the period 2010-2015, therefore an estimation methodology has been put in place to cover the data gap on fuel burnt for the period 2016-2023;
- the AOs registered in Italy considered for the development of the methodology are indicated in Table 7.2 together with the years of availability of the AERs;

Aircraft Operator	ICAO Designator	AERs availability period [*]
AIR DOLOMITI	DLA	2019-2023
AIR ITALY	ISS	2019
NEOS	NOS	2019-2023
ALITALIA	AZA	2019-2021
CARGOLUX ITALIA	ICV	2019-2023
BLUE PANORAMA AIRLINES	BPA	2019-2021
ERNEST	TZE	2019
ITA - ITALIA TRASPORTO AEREO	ITY	2021-2023
SIRIO	SIO	2022-2023
ALISCARGO AIRLINES	LSI	2022
AEROITALIA	AEZ	2023
[*]: 2020 excluded for effects of COVID-19 on data		

Table 7.2. Aircraft Operators with Italy as “State of Registry” and AERs availability

- the average yearly fraction of fuel uplifted in Italy for international flights of the AOs listed in Table 7.2 has been estimated as shown in Table 7.3, by analysing the data from the submitted AERs between 2019 and 2023;



Year	Jet-Fuel Supply Int.IT [k tons] - estimation	Jet-Fuel Burnt Int.IT [k tons]	Jet-Fuel Supply Int.IT/ Jet-Fuel Burnt Int.IT
2019	805.2	1 682.8	47.9%
2020	-	-	-
2021	170.8	438.4	39.0%
2022	323.6	739.7	43.7%
2023	452.9	985.9	45.9%
Average fraction			44.1%

Table 7.3. Estimation of fuel uplifted in Italy for international flights from AERs data

- the estimated values of “Jet-Fuel Supply Int.IT” have been then used to evaluate the fraction intended for international flights of the total aviation fuels supplied in Italy (“Aviation Fuels Supply Tot” in Table 7.1). This second estimation, which has been limited to the period 2010-2019 to avoid the effects of the COVID-19 outbreak in 2020, has brought to the result of an average fraction equal to 15.6%;
- given these two fractions, it is possible to use the total aviation fuels supplied in Italy to estimate the fuel burnt for international aviation, for the AOs attributed to Italy according to the ICAO method and for the whole period of interest, by means of the following formula:

$$\text{Jet-Fuel Burnt Int.IT} = \frac{15.6\%}{44.1\%} \text{ Aviation Fuels Supply Tot}$$

- results provided by the previous formula have been validate by comparing the so-called Fuel Efficiency (FE), i.e. the ratio between fuel burnt and RTK, deriving from its application with the data provided by ICAO. As Figure 7.1 shows, the comparison indicates a good accordance among the model and the available data (RMS error = 1%).

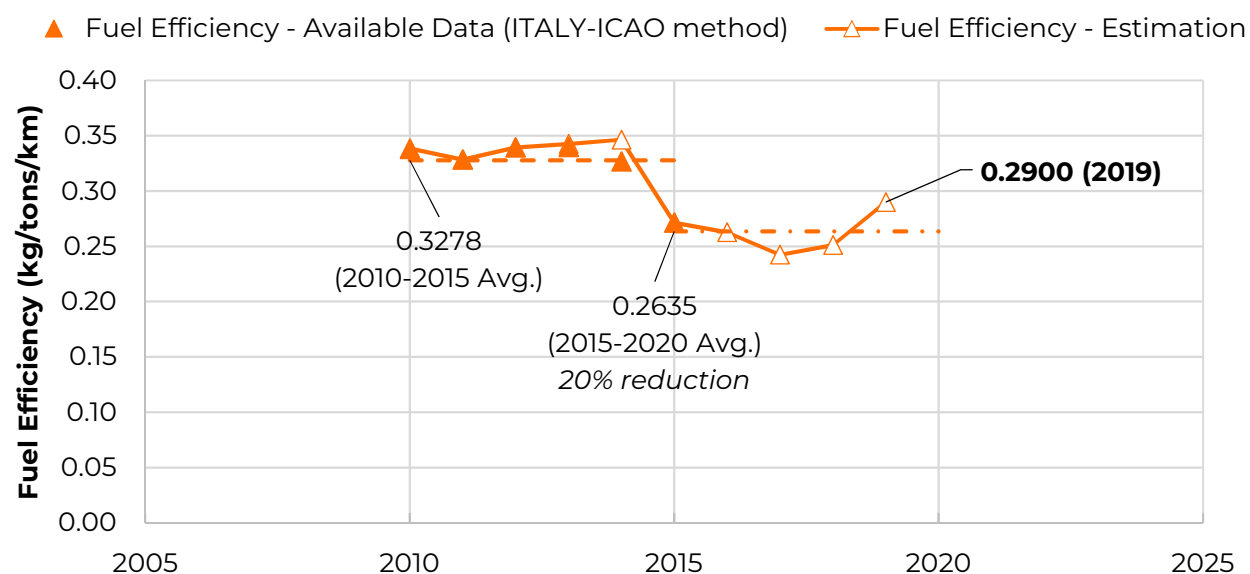


Figure 7.1. ICAO method for Italy: estimated fuel efficiency of international flights (2010-2020)

- finally, some assumptions have been introduced to define the projections of RTK and fuel burnt to 2050 represented in Figure 7.2:



- the effect of COVID-19 outbreak is modelled as a pause in the traffic growth between 2020 and 2025;
- RTK data from ICAO data for the period 2010-2019 are adopted to estimate the average future traffic trend, modelled as a linear growth of in the period 2025-2050 with an estimated average growth of about 220 M tons km / year (see equation in Figure 7.2);
- the fuel burnt is estimated according the procedure here described for the period 2010-2019,
- for the period 2020-2050, the fuel burnt is calculated with the formula

$$\text{Jet-Fuel Burnt Int.IT} = \text{RTK} \cdot \text{FE}_{2019}$$

- which follows the assumption that, in absence of mitigation measures capable to reduce the fuel consumption, FE will not be improved beyond the 2019 level, i.e. the value reported in Figure 7.1 (0.29 tons / k tons) will not be furtherly reduced.

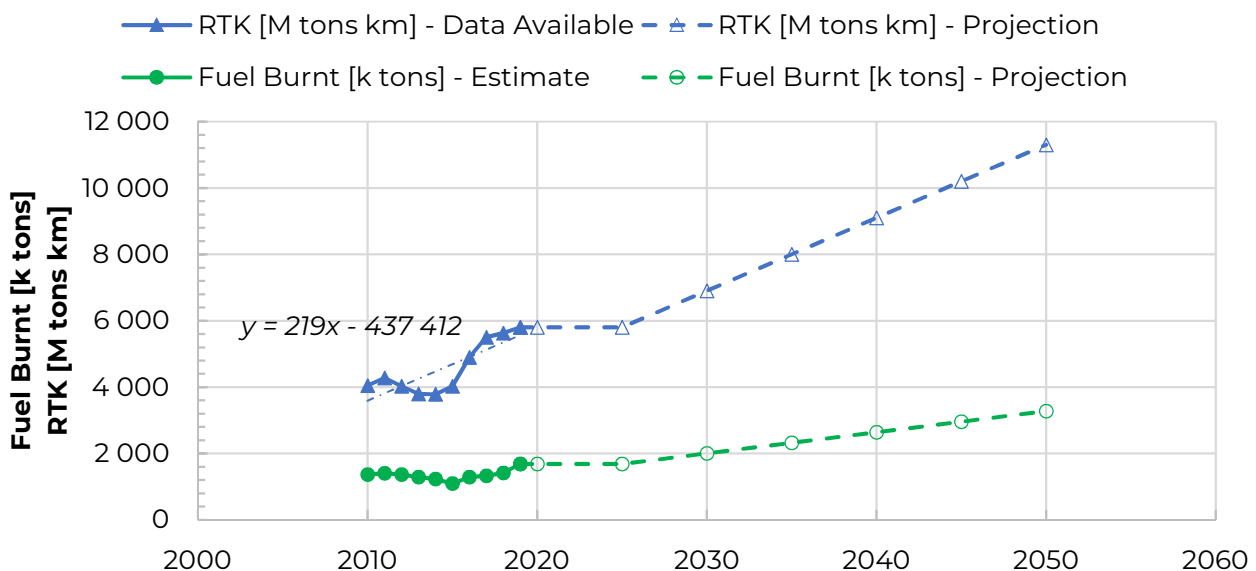


Figure 7.2. ICAO method for Italy: data and projections to 2050 for RTK and fuel burnt related to international flights (2010-2020)

The presentation of the baseline scenario in terms of CO₂ emissions is reported and discussed in Section 7.2.

7.1.2 IPCC ATTRIBUTION METHOD

The workflow adopted to define the baseline scenario according to IPCC method is described here below:

- the fraction of the total aviation fuels supplied in Italy intended for international flights of all the airlines departing from Italian airports has been calculated, using data from Table 7.1, as shown in Table 7.4;



Year	Jet-Fuel Burnt Int/Aviation Fuels Supply Tot
2010	75.9%
2011	86.3%
2012	82.8%
2013	80.7%
2014	88.4%
2015	88.0%
Average fraction	83.7%

Table 7.4. Fraction of the total aviation fuels supplied in Italy for international flights

- the fuel burnt according to IPCC method has been estimated for the whole period 2010-2020 by applying the average fraction to the “Aviation Fuels Supply Tot” data;
- RTKs have been estimated by multiplying the number of passengers departing from Italy (assumed to be 50% of total passengers from international flights reported in Table 7.1), considering a mass of 0.1 tons per passenger and assuming an average route length of 2500 km for each international flight;
- this latter assumption has been validated by comparing the results with the ICAO data available for the period 2010-2015, here reported in the column “RTK Int” of Table 7.1, obtaining a RMS error of 1.8%;
- the fuel efficiency has been then calculated for the period 2010-2020, providing the results shown in Figure 7.3.

▲ Fuel Efficiency - Available Data (ITALY-IPCC method) —▲— Fuel Efficiency - Estimation

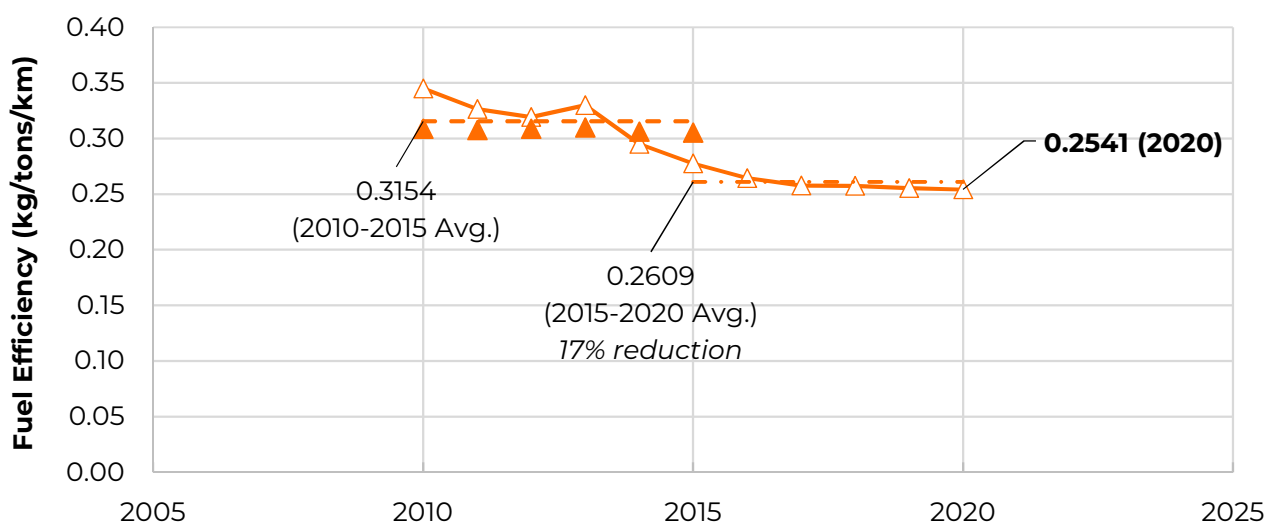


Figure 7.3. IPCC method for Italy: estimated fuel efficiency of international flights (2010-2020)

- finally, some assumptions have been introduced to define the projections of RTK and fuel burnt to 2050 represented in Figure 7.4:
 - as for the ICAO method, the effect of COVID-19 outbreak is implemented in the model as a pause in the traffic growth between 2020 and 2025;

- o RTK data from ICAO data for the period 2010-2019 are adopted to estimate the average future traffic trend, modelled as a linear growth of in the period 2025-2050 with an estimated average growth of about 510 M tons km / year (see equation in Figure 7.4);
- o the fuel burnt is estimated according to the procedure here described for the period 2010-2020;
- o for the period 2020-2050, the fuel burnt is calculated with the formula

$$\text{Jet-Fuel Burnt Int.IT} = \text{RTK} \cdot \text{FE}_{2020}$$

- which follows the assumption that, in absence of mitigation measures capable to reduce the fuel consumption, FE will not be improved beyond the 2020 level, i.e. the value reported in Figure 7.3 (0.2541 kg/tons/km) will not be furtherly reduced.

The presentation of the baseline scenarios in terms of fuel consumption, CO₂ emissions and traffic data are reported and discussed in Section 7.2.

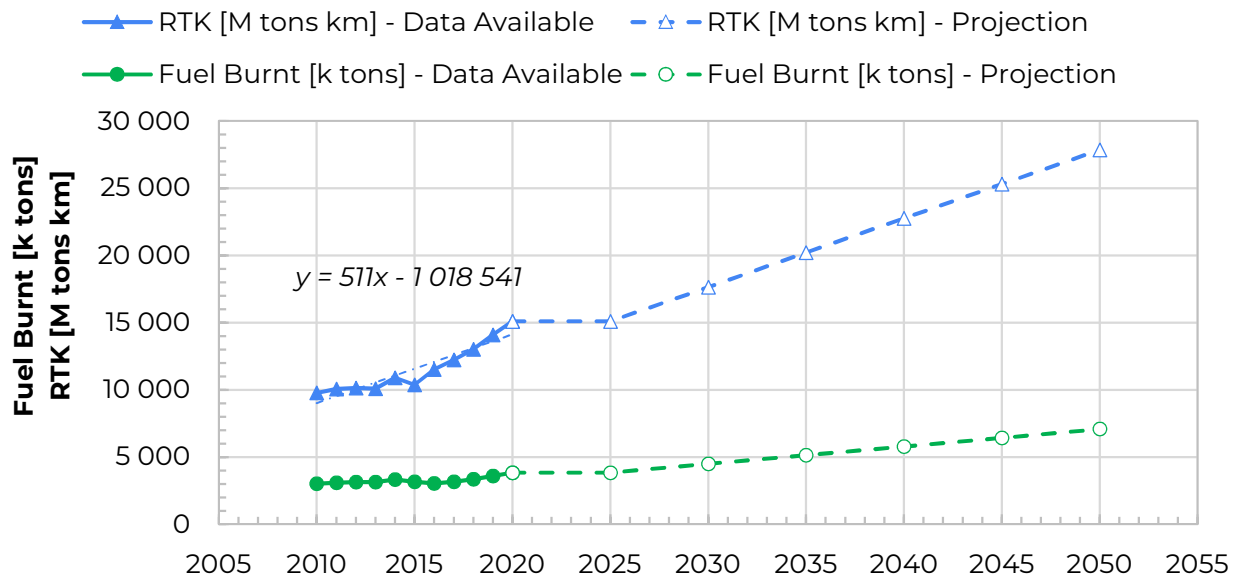


Figure 7.4. IPCC method for Italy: data and projections to 2050 for RTK and fuel burnt related to international flights

7.2 RESULTS

As required by the ICAO guidance, data about the projected future fuel consumption, CO₂ emissions and traffic data are reported in Table 7.5 for each five-year period up to 2050. Data refer to both the case of international flights attributed to Italy according to the ICAO method ("State of Registry") and the case of IPCC attribution method ("State of Origin"). CO₂ emissions, represented in Figure 7.5 as well, have been calculated according to the following formula:

$$\text{CO}_2 \text{ Emissions} = 3.16 \cdot \text{Fuel Burnt.}$$



Year	Italy – ICAO method			Italy – IPCC method			Notes
	RTK [M tons km]	Fuel Burnt [k tons]	CO ₂ Emissions [k tons]	RTK [M tons km]	Fuel Burnt [k tons]	CO ₂ Emissions [k tons]	
2010	4 049	1 368	4 323	9 770	3 014	9 524	Historical data
2011	4 276	1 404	4 438	10 060	3 092	9 771	
2012	4 030	1 367	4 320	10 141	3 129	9 889	
2013	3 793	1 288	4 070	10 090	3 125	9 876	
2014	3 783	1 235	3 903	10 899	3 335	10 538	
2015	4 030	1 094	3 456	10 374	3 165	10 001	
2016	4 897	1 286	4 063	11 505	3 040	9 606	
2017	5 500	1 333	4 211	12 234	3 151	9 957	
2018	5 634	1 415	4 471	13 006	3 345	10 571	
2019	5 803	1 683	5 318	14 086	3 595	11 362	
2020	5 803	1 683	5 318	15 099	3 836	12 122	COVID-19
2025	5 803	1 683	5 318	15 099	3 836	12 122	
2030	6 903	2 002	6 326	17 649	4 484	14 169	Projection
2035	8 003	2 321	7 334	20 199	5 132	16 216	
2040	9 103	2 640	8 342	22 749	5 780	18 263	
2045	10 203	2 959	9 350	25 299	6 427	20 311	
2050	11 303	3 278	10 358	27 849	7 075	22 358	

Table 7.5. Data of the baseline scenario for Italy according to ICAO and IPCC methods

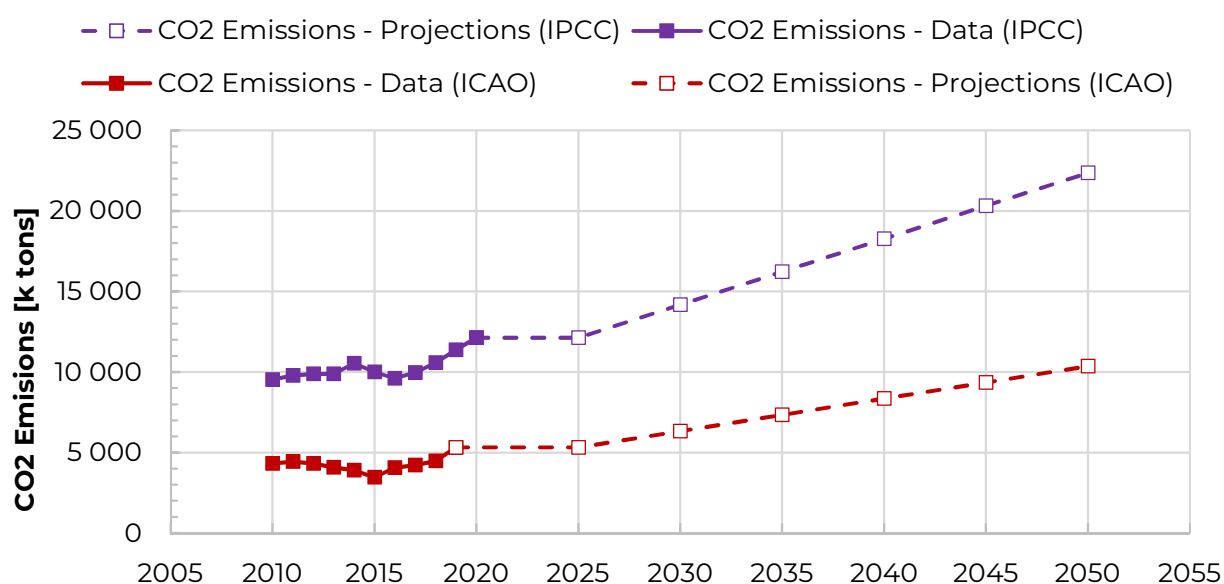


Figure 7.5. Baseline Scenario: CO₂ emissions from international aviation attributed to Italy

Some remarks concerning the final and the intermediate results are worth to be made:

- the data about the fuel efficiency of international flights attributed to Italy, shown in Figure 7.1 for the ICAO method and in Figure 7.3 for the IPCC method, indicate that moving from the period 2010-2015 to the period 2015-2020 an average improvement of about 20% and 17% can be observed, respectively. This result, although obtained through approximations and

under some assumptions, represent an assessment of the cumulated mitigation measures put in place in a collective manner by the stakeholders active in Italy in the last two decades;

- the traffic growth here estimated for the international flights attributed to Italy can be compared to the aggregated European data reported in the first Section of the present document. As reported in Table 7.6, the comparison, made on data from IPCC attribution method for coherence, shows a good accordance between the average yearly traffic (RTKs) growth up to 2050 and, although ICAO attribution method follows different criteria, similar trends can be found also in that case.

Year	Averaged yearly traffic growth (RTKs)		
	EU/ECAC Baseline Scenario (IPCC method)	Italy Baseline Scenario	
		IPCC method	ICAO method
2010	-	-	-
2019	5.6%	4.9%	4.8%
2023/2025 [*]	-0.6%	1.2%	0.0%
2030	2.8%	2.9%	3.2%
2040	2.0%	2.2%	2.4%
2050	1.6%	1.8%	1.9%
[*] 2023 for EU/ECAC data, 2025 for Italy data			

Table 7.6. Comparison between EU/ECAC and Italy traffic growth

8 MEASURES TO MITIGATE CO₂ EMISSIONS

According to the ICAO Guidance (Ref. [175]), the section dedicated to the CO₂ mitigation measures should provide the following information:

- the measures selected to address CO₂ emissions from international aviation should be described by distinguishing between those that are already in place and those that are planned for future implementation;
- list of mitigation measures selected should be provided together with the estimated benefits in terms of annual CO₂ emissions reductions and fuel savings, duly quantified per year and per measure(s) up to at least 2050.

8.1 IN PLACE AND PLANNED CO₂ EMISSION MITIGATION MEASURES

As a part of the functional activities for the update of the National State Action Plan on CO₂ emissions, a survey has been developed in order to identify the main mitigation measures already implemented, on-going or planned by Airport Managing Bodies and Aircraft Operators. Instead, for the Air Navigation Service Provider a dedicated and detailed section is included in the following of this Chapter.

The survey, whose template is reported in Table 8.1, has been organised in three sections and an annex with brief explanatory notes for each of the 20 measures included in the ICAO “basket” (here reported in Appendix A):

- section 1: data of the organization;
- section 2: mitigation measures, i.e. the actual survey with close-ended questions, articulated on the 20 measures identified by the doc. ICAO 9988;
- section 3: free comments to describe the initiatives of the organization.

The questionnaire has been distributed among the interested stakeholders together with the invitation to the 8th Technical Meeting of the National Observatory on SAF, held on July 8th 2024 in Rome. The following organizations have been involved:

- 20 Airport Managing Bodies (Aeroporti di Roma S.p.A., Aeroporti Di Puglia Spa, Aeroporto di Bologna S.p.A., Gruppo Save S.p.A., S.E.A. S.p.A., SACAL S.p.A., SACBO S.p.A., SAGAT S.p.A., SOGAER S.p.A., AIRGEST S.p.A., Aeroporto Di Genova S.p.A., Aeroporto Di Treviso S.p.A. (AER TRE), Aeroporto Valerio Catullo S.p.A., GE.S.A.C. S.p.A., GEASAR S.p.A., GES.A.P. S.p.A., SAC S.p.A., SACAL S.p.A., SO.GE.A.AL S.p.A., Toscana Aeroporti S.p.A.);
- 23 Aircraft Operators, (Aeroitalia S.r.l., Air Dolomiti S.p.A., Alba Servizi Aerotrasporti S.p.A., Aliscargo Airlines S.p.A., Avio Nord S.r.l., Cargolux Italia S.p.A., CGR S.p.A., EasyJet, Elilombarda, ENI Servizi Aerei S.p.A., Interjet S.r.l., ITA Airways S.p.A., Leader S.r.l., Neos S.p.A., Poste Air Cargo S.r.l., Ryanair, Slam Air S.r.l., Aliserio S.r.l., Sardinian Sky Service S.r.l., Sirio S.p.A., Italfly S.r.l., SkyAlps S.r.l., Fedex Corporation).



Mitigation measures	Completed	On-going	Planned (next 5 years)	Likely to be implemented in the near future (next 5 years)	Unlikely to be implemented in the near future (next 5 years)
1. Purchase of new aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Improve fuel efficiency through development or modification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Replacement of engines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Aviation alternative fuels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Measures to improve pre-departure and arrival planning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Measures to improve collaborative decision making	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Measure to Improve Air Traffic Management in non-radar airspace	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Increase fuel efficiency of departure and approach procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Introduce continuous climb and descent procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Improve aircraft guidance on apron	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Measures to improve taxiing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Minimizing weight	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Minimizing flaps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Minimizing reversers use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Reduced speed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Maintenance: engine washing and zonal drying	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Selecting aircraft best suited to the mission	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Installation of fixed electrical ground power and pre-conditioned air to allow aircraft Auxiliary Power Unit switch-off	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Use cleaner alternative sources of power generation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Construction of additional taxiways	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 8.1. Template of survey for the preliminary identification of mitigation measures by Airport Managing Bodies and Aircraft Operators

The results are summarized in Figure 8.1 and Figure 8.2, for Airport Managing Bodies and Aircraft Operators respectively, filtering the measures for each stakeholders' category according to the guidelines adopted for the quantification of CO₂ emission reduction (see Table 9.1).



Airport Managing Bodies

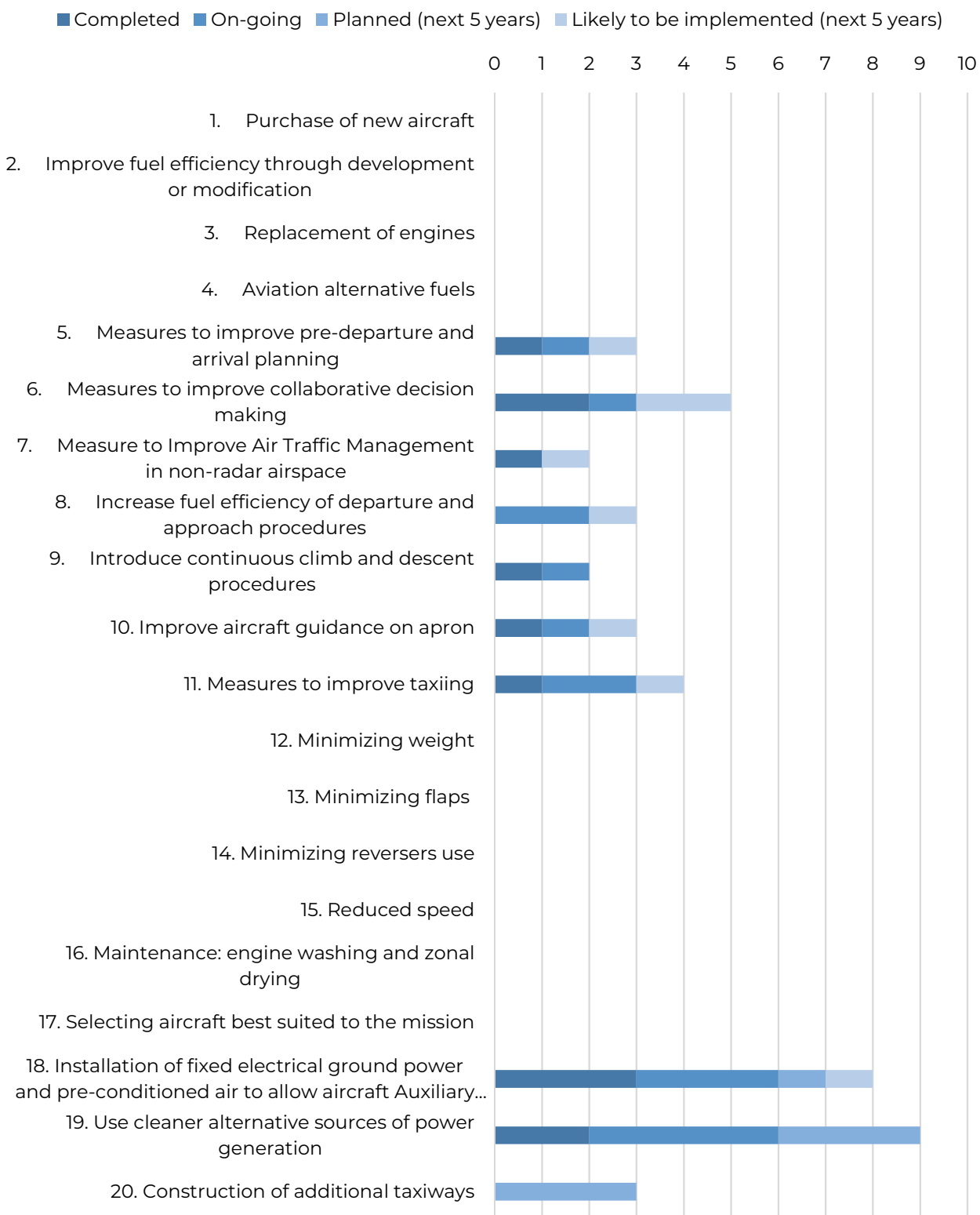


Figure 8.1. Results of the preliminary survey on mitigation measures by Airport Managing Bodies

Aircraft Operators

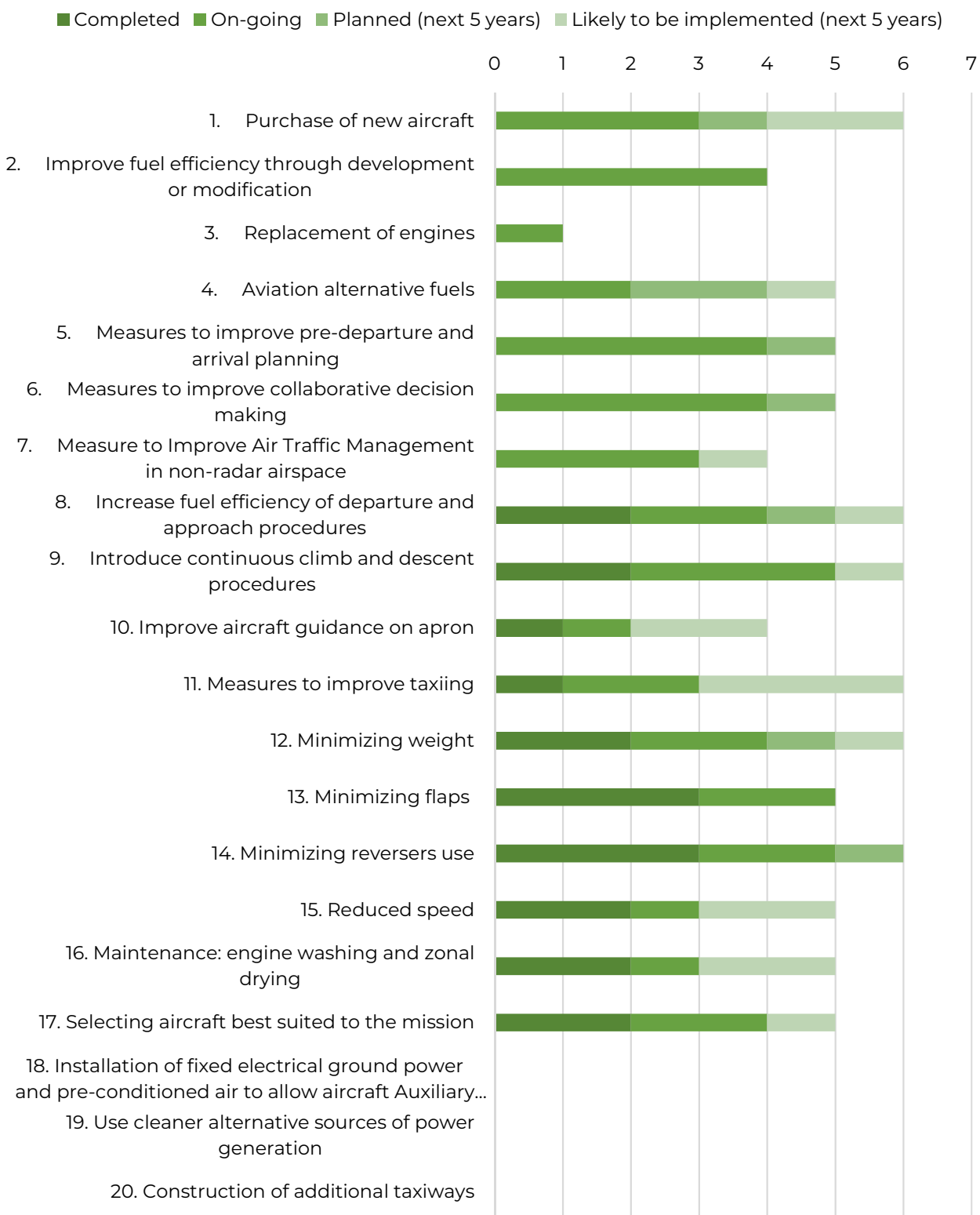


Figure 8.2. Results of the preliminary survey on mitigation measures by Aircraft Operators

8.2 LIST OF MITIGATION MEASURES

The following paragraphs report the description of the measures planned by all the involved stakeholders. Results on estimated benefits from each measure are reported in the following chapter.

8.2.1 AIR NAVIGATION SERVICE PROVIDERS

8.2.1.1 ENAV S.p.A.

ENAV S.p.A. is the main Italian Air Navigation Service Provider and its first mission is to guarantee the safety of air traffic management and then the punctuality for millions of passengers flying in Italy's skies; in line with its mission - ensuring the safety and punctuality of around 1.8 million controlled flights per year, on an airspace measuring more than 750,000 sq.km., with a peak of 7,300 daily flights managed - ENAV contributes to the growth of national and international air transport based on efficiency and innovation.

Initially transformed into a publicly controlled joint-stock company (1st January 2001), since 26th July 2016 (when shares was publicly listed on market), ENAV has become a joint-stock company, controlled by the Ministry of Economy and Finance (MEF) and supervised by the Ministry of Sustainable Infrastructure and Transport (MIT). MEF holds 53,3% stake in ENAV.

ENAV mission is to provide Air Navigation Services to assist air traffic in overfly, approach, departure and landings operations from/to 45 main Italian Airports and in Italian FIR/UIR airspace. Thanks to its operational units (Control Towers and Area Control Centers) and its advanced technical facilities, ENAV provides around-the-clock Air Traffic Services ensuring air traffic flow and regularity, with absolute safety.

In addition to the Air Traffic Services Provision, ENAV is designated by Italian State and is certified according to the Single European Sky regulatory framework by National Supervisory Authority, to provide Aeronautical Information Services, Airspace and Instrumental Flight Procedures design, Aeronautical Meteorological Forecasts and Airport Meteorological Observations, other than Flight Validation and Flight-Check activities and to provide, according to the European and/or National regulations, all professional training (i.e., Air Traffic Controllers, Flight Information Service Officers, Meteorologists and Technical Meteorologist, ATS Engineering Personnel, etc.).

ENAV has its legal HQ in Rome and operating facilities throughout the National territory and in addition to ensuring the provision of Air Navigation Services, through its subsidiaries, ENAV Group provides installation, maintenance, continuous monitoring and new technologies development and validation of ATM/CNS/MET systems. ENAV Group consists, in addition to ENAV S.p.A., of Techno Sky, IDS AirNav, D-Flight, ENAV Asia Pacific, ENAV North Atlantic/Aireon and ESSP.

Techno Sky – a subsidiary company that has in charge the ATM, CNS and MET systems and equipment development, implementation and maintenance both for ENAV and for external customers.

IDS AirNav – a subsidiary company that develop Commercial-Off-the-Shelf and its own software and systems which are provided to more than 130 customers, within 5 Continents, ensuring



customized and full compliance high-tech solutions aimed to support the transition from Aeronautical Information Services to Aeronautical Information Management, the Airspace Design activities and the Air Traffic Flow Management.

D-Flight - company created by ENAV in partnership with Leonardo and Telespazio to develop the Italian Unmanned Aerial Vehicles (UAV) platform both for the minimum and for the additional set of services/functions requested to play a role in the U-Space Service Provision.

ENAV Asia Pacific - a subsidiary company, based in Kuala Lumpur, which have in charge all ENAV's Group business and commercial activities developed for the Middle East and Asia customers.

ENAV NORTH ATLANTIC - a subsidiary company, based in the United States, to manage the activities related to Aireon (International Consortium made to implement the first global satellite surveillance service for air traffic control and of which ENAV holds 12,5% of shared capital).

ESSP - the European satellite navigation service, EGNOS, PPP Company of which ENAV holds 16.6% of the stake capital.

ENAV, together with its subsidiary companies, plays a leading role in key international partnerships and programmes such as the SESAR Deployment Manager, BLUE MED Functional Airspace Block, 4Flight/Coflight and, through its own acknowledged experts, actively contributes to the work of international institutions and organizations such as ICAO, the European Commission, EUROCONTROL, EASA and EUROCAE as well as the World-Wide Industry Association CANSO (Civil Air Navigation Services Organisation).

Thanks to its long-standing experience in Air Navigation Service Provision and in Aeronautical Consulting, ENAV plays an outstanding role providing operational services and enhanced solutions worldwide and, following its vision, starting from reinforced cooperation and advanced synergy with the Aviation Stakeholders, ENAV priority is to ensure a continuously improvement of the safety and quality of services provided, evaluating the opportunities offered by the technology innovation in order to reach customers, partners and stakeholders needs and finally the wider community benefit.

8.2.1.1.1 Flight Efficiency Plan

One of ENAV's key objectives is to contribute to lowering the environmental impact related to flight operations. To this regard, in accordance with the relevant international guidelines, ENAV promotes wide-ranging initiatives to decrease the amount of greenhouse gases.

In winter 2008/2009, the Company released its first three-year action plan, which is annually monitored and reviewed. Moreover, ENAV has in place structural initiatives, mainly addressed to airlines, aimed at increasing cooperation and sharing operational suggestions with Airspace Users to elaborate enhanced and tailored operational solutions. The information exchange has followed-up important feedbacks to fine-tune ENAV FEP initiatives.

Since ENAV's FEP first publication, thanks to a continuous process of review and improvement of the air navigation system, projects and measures had been set to ensure greater airspace accessibility delivering increased route availability, designing airspace portions and new



operational procedures that enabled a more efficient use of terminal areas and approaches.

Ad-hoc ATCO training courses which are more focused on efficiency contribute to further deliver performance improvements. In fact, one of the cornerstones of the Flight Efficiency Plan consist in rising air traffic controllers' awareness since they can give a mighty contribution for fuel savings both to in-flight and on-the-ground operations. The principles of flight efficiency and their environmental implications were planned to be part of all recurrent trainings for ATCOs ever since ENAV first FEP edition.

- ENAV's FEP edition 2024-2026 collects the following main programmes:
 - Free Route Airspace Italy – FRA IT:
 - lowering FRA IT lower limit from fl305 to fl195;
 - Crossborder FRA operations FRA IT with SECSI FRA
 - Crossborder FRA operations FRA IT with FRA MT
- Airspace Restructuring Programme
- PBN Implementation Plan Italy/ENAV's PBN Transition Plan: improvements to SID, STAR, IAP design on going for planned implementation in the table below
- ACDM at Catania airport

Under the framework of the National Performance Plan, endorsed by CAA according to Reg. (EU) 390/2013 and subsequent amendments thereto, ENAC monitors ENAV FEP because of its environmental relevance.

The implemented measures have allowed considerable savings in terms of fuel consumption and GHG emissions thus producing their positive effects year after year. Since 2013 till December 2024, the main achievements were:

- Free Route Airspace Italy (FRA IT) above FL 195 implemented in March 2024 (above FL305 in May 2018, above FL335 in December 2016);
- PBN Implementation Plan Italy/ENAV's PBN Transition Plan:
 - SID and STAR RNAV1 implementation completed for Airports;
 - All airports with Instrument RWY End, provided with at least 1 RNP APCH IAP
- AMAN Extend Horizon for:
 - Roma Fiumicino and Roma Ciampino Airports
 - Milano Malpensa, Bergamo and Milano Linate Airports
- AIRPORT COLLABORATIVE DECISION MAKING (A-CDM) implemented at Fiumicino, Malpensa, Venezia, Linate, Napoli, and Bergamo.

From the environmental point of view, the incremental implementation of the FRAIT, along with adaptations to the below-placed ATS route network and PBN IFPs for airports have allowed shorter distances with less fuel consumption and CO₂ emissions: an overall saving of 318 million



kg of fuel, with a simultaneous reduction in CO₂ of approximately 1.000.000 Tonnes, in time frame 2017-2023.

It is worth point out the major projects also considering the objective to increase capacity and cost-efficiency performance while maintaining or increasing safety performance and reaching the performance requirements defined by Reg. (EU) 691/2010 subsequent amended and supplemented by the other relevant European regulations and implementing rules currently in force.

<p>Free route Airspace Italy - FRA-IT</p>	<p>The Free Route, along with Flexible Airspace Management, is part of the six so-called Pilot Common Project supporting the implementation of the European Air Traffic Management Master Plan (Commission Implementing Rule (EU) 116/2021), which provides for the implementation (by FL 310+) of Direct Routing operations (by 1 January 2018) and operations Free Routing (by 1 January 2022). In this context, ENAV decided to follow up the activity carried out with the R&D SESAR related pioneering projects, WE-FREE and FREE Solutions, (Free Route and Environmental Efficient Solutions) which were aimed to demonstrating the feasibility and supporting implementation of a plannable user-preferred route through a wide campaign of live trials, the operational impact assessment with a view to de-risk the implementation of the main concepts addressed towards the deployment phase.</p> <p>On 8th December 2016, ENAV implemented the Free Route operations in the Italian airspace above FL335, enlarged the free route Italian airspace offering the capability for optimal trajectories 24/7 above FL305 as of 2018, and further expanded the FRAIT moving the lower boundary down to FL 195 in March 2024.</p> <p>Within FRAIT aircraft may freely fly a direct path and an optimal vertical profile between a pair of defined Entry Point and Exit Point, without reference to an ATS Route Network. FRAIT operations are available for overflights as well as for arriving and departing traffic. Ad hoc continuous training sessions and some technological upgrades to the ATC systems have been accomplished to provide ATCOs with tools to manage traffic in Free Route airspace.</p> <p>Since December 2016 the expectations on FRAIT, in terms of better performance, have been long-established.</p>
<p>Airspace Restructuring Programme</p>	<p>The comprehensive ENAV's Airspace Restructuring Programme, hence, aims to maintain, and possibly increase, the efficiency levels of airspace usability, thus ensuring the best possible performance in terms of capacity, environment and flight efficiency while at least maintaining the current safety levels. In view of the increasing traffic flows, the present airspace structure is being reviewed to implement solutions aimed at improving its structural aspects and work organisation taking full advantage from the</p>



	FRA-IT, the Free Route cross border operation with neighbouring ANSPs (FRAIT SECSI project already implemented, initial coordination activated with Malta ANSP), and technological innovations such as new CoFlight/4Flight system in the Area Control Centres (ACCs). The programme involves all the 4 Italian ACCs, located in Brindisi, Milan, Padua and Rome, to which approach control services are gradually being transferred from the relevant local APP control centres.
PBN Implementation Plan Italy and ENAV's PBN Transition Plan	The PBN procedures optimize the use of Airspace, allowing a more efficient design and use of Instrumental Flight Procedures (IFPs) in the Terminal Area, which may support the ATM systems improvement in balancing of the performance levels in the Key Performance Areas of Safety (i.e., reducing the congested airspace management and the related ATCOs task-load) Environment (i.e., reducing flight times and/or enabling CDO/CCO, supporting AUS in fuel consumptions and CO ₂ emissions reductions, but also reducing the energy consumption and electro-magnetic emission of the ground navigation equipment), Capacity (i.e., optimizing the traffic flow and its predictability) and ATM Cost-Effectiveness (i.e., reducing the cost of implementation and maintenance of ground navigation infrastructures). <i>More details are reported in the following focus section.</i>
Airport Collaborative Decision Making (A-CDM)	In cooperation with airport operators and airspace users, ENAV has undertaken the deployment of the A-CDM for the Italian main airports. The project is intended to enhance the efficiency of airport operations, by improving the departure sequences and taxi-times (-out and -in). Six Italian airports - Rome Fiumicino, Milan Malpensa, Milan Linate, Venice, Naples and Bergamo- implemented Full A-CDM with data sharing among Air Traffic Control, Airport Operators, Airspace Users and Network Manager Operational Centre. A-CDM system will be put into operation at Catania Airport by 2026. Air Traffic Controllers skilled in delivering efficient ground operations along with automation represent enabling factors for the reduction of apron and taxiway congestion while still guaranteeing the traffic flows and the airspace users' needs. In a number of other airports, a basic system for automatic data exchange managed by ENAV is available.

Focus on ENAV's PBN Implementation Plan Italy

In 2012, according to the ICAO Resolution A37-11, ENAC and ENAV prepared - with the contribution of the major stakeholders (AM, Alitalia, Agusta-Leonardo, etc.) - and issued the PBN Implementation Plan Italy, which provided several major Italian airports with P-RNAV SIDs/STARs and RNAV APCH procedures.

The airspace strategy and concept, and its associated implementation plan are developed in collaboration with all the involved stakeholders, it follows the high-level principles elaborated by the State and complies with both European and national regulatory requirements, particularly as



regards:

- Commission Implementing Regulation (EU) N.1048/2018 (PBN IR) laying down airspace usage requirements and operating procedures concerning performance-based navigation;
- Commission Implementing Regulation (EU) N. 716/2014 (PCP IR), on the establishment of the Pilot Common Project (PCP) supporting implementation of the European Air Traffic Management Master Plan, AF#1 Extended Arrival management and PBN in the high-density terminal manoeuvring areas.

ENAV's PBN Transition Plan 2.0, first edition was issued in 2020, comes to ensure compliance with EU regulations and to meet our national environmental commitments, without impacting on the safety or capacity of the airspace. It also complies, of course, with objectives formulated by ICAO in the Global Air Navigation Plan (GANP) and resolution 37-11 and is aligned with the objectives defined in the Italian National Air Space Strategy Implementation Plan.

Airport	ICAO Code	RWY	SID PBN		STAR PBN		IAP PBN		
			Obj 4 [*]	Obj 8 [*]	Obj 4 [*]	Obj 8 [*]	RNP APCH LNAV	RNP APCH LNAV/VNAV	RNP APCH LPV
Crotone	LIBC	17	✓	2030	✓	2030	✓	✓	✓
Crotone	LIBC	35	✓	2030	✓	2030	✓	✓	✓
Bari/Palese	LIBD	7	✓	2030	✓	2030	✓	✓	✓
Bari/Palese	LIBD	25	✓	2030	✓	2030	✓	✓	✓
Taranto/Grottaglie	LIBG	17	✓	2030	N.A.	N.A.	N.A.		
Taranto/Grottaglie	LIBG	35	✓	2030	✓	2030	✓	✓	✓
Pescara	LIBP	4	✓	2030	N.A.	2030	N.A.		
Pescara	LIBP	22	✓	2030	✓	2030	✓	✓	✓
Brindisi/Casale	LIBR	13	✓	2030	✓	2030	✓	✓	✓
Brindisi/Casale	LIBR	31	✓	2030	✓	2030	✓	✓	✓
Lamezia Terme	LICA	10	✓	2030	✓	2030	✓	✓	✓
Lamezia Terme	LICA	28	✓	2030	✓	2030	✓	✓	✓
Lampedusa	LICD	8	✓	2030	✓	2030	✓	✓	✓
Lampedusa	LICD	26	✓	2030	✓	2030	✓	✓	✓
Pantelleria	LICG	2	✓	2030	N.A.	N.A.	N.A.		
Pantelleria	LICG	7	✓	2030	✓	2030	✓	✓	✓
Pantelleria	LICG	20	No SID		✓	2030	✓	✓	✓
Pantelleria	LICG	25	✓	2030	✓	2030	✓	✓	✓
Palermo/Punta Raisi	LICJ	2	✓	2030	N.A.	N.A.	N.A.		
Palermo/Punta Raisi	LICJ	7	✓	2030	✓	2030	✓	N.F. [3]	✓
Palermo/Punta Raisi	LICJ	20	✓	2030	✓	2030	✓	N.F. [3]	✓
Palermo/Punta Raisi	LICJ	25	✓	2030	✓	2030	✓	N.F. [3]	✓
Reggio Calabria	LICR	15	✓	2030	✓	2030	✓	✓	✓
Reggio Calabria	LICR	29	✓	2030	N.A.	N.A.	N.A.		
Reggio Calabria	LICR	33	✓	2030	✓	2030	✓ [4][5]	N.F. [5]	N.F. [5]
Alghero/Fertilia	LIEA	2	✓	2030	✓	2030	✓	✓	✓
Alghero/Fertilia	LIEA	20	✓	2030	✓	2030	✓	✓	✓
Olbia/C. Smeralda	LIEO	5	✓	2030	✓	2030	✓	✓	N.F. [3]
Olbia/C. Smeralda	LIEO	23	✓	2030	✓	2030	✓	✓	✓
Milano/Malpensa	LIMC	17L	✓	2030	✓	2030	✓	✓	✓
Milano/Malpensa	LIMC	17R	✓	2030	✓	2030	✓	✓	✓



Airport	ICAO Code	RWY	SID PBN		STAR PBN		IAP PBN		
			Obj 4 [*]	Obj 8 [*]	Obj 4 [*]	Obj 8 [*]	RNP APCH LNAV	RNP APCH LNAV/VNAV	RNP APCH LPV
Milano/Malpensa	LIMC	35L	✓	2030	✓	2030	✓	✓	✓
Milano/Malpensa	LIMC	35R	✓	2030	✓	2030	✓	✓	✓
Bergamo/Orio Al Serio	LIME	10	✓	2030	✓	2030	✓	✓	✓
Bergamo/Orio Al Serio	LIME	28	✓	2030	✓	2030	✓	✓	✓
Torino/Caselle	LIMF	18	✓	2030	N.A.	N.A.	N.A.		
Torino/Caselle	LIMF	36	✓	2030	✓	2030	✓	✓	✓
Albenga	LIMG	9	✓ ICP visual	2030	N.A.	N.A.	N.A.		
Albenga	LIMG	27	No SID		✓	2030	✓ Solo Break Clouds		
Genova/Sestri	LIMJ	10	✓	2030	✓	2030	✓ [4]	N.F.	N.F.
Genova/Sestri	LIMJ	28	✓	2030	✓	2030	✓	✓	✓
Milano/Linate	LIML	18	✓	2030	✓	2030	✓	✓	✓
Milano/Linate	LIML	36	✓	2030	✓	2030	✓	✓	✓
Parma	LIMP	2	✓	2030	N.A.	N.A.	N.A.		
Parma	LIMP	20	✓	2030	✓	2030	✓	✓	✓
Cuneo/Levaldigi	LIMZ	3	✓	2030	N.A.	2030	N.A.		
Cuneo/Levaldigi	LIMZ	21	✓	2030	✓	2030	✓	✓	✓
Bolzano	LIPB	1	✓	2030	✓	2030	✓	N.F. [1]	N.F.
Bolzano	LIPB	19	✓	2030	✓	2030	N.A.		
Bologna/B. Panigale	LIPE	12	✓	2030	✓	2030	✓	✓	✓
Bologna/B. Panigale	LIPE	30	✓	2030	✓	2030	✓	✓	✓
Forlì	LIPK	12	✓	2030	✓	2030	✓	✓	✓
Forlì	LIPK	30	✓	2030	✓	2030	2023	2023	✓
Brescia/Montichiari	LIPO	14	✓	2030	✓	2030	✓	✓	✓
Brescia/Montichiari	LIPO	32	✓	2030	✓	2030	✓	✓	✓
Trieste/Ronchi D. L.	LIPQ	9	✓	2030	✓	2030	✓	✓	✓
Trieste/Ronchi D. L.	LIPQ	27	✓	2030	N.A.	N.A.	N.A.		
Rimini/Miramare	LIPR	13	✓	2030	✓	2030	✓	✓	✓
Rimini/Miramare	LIPR	31	✓	2030	✓	2030	✓	✓	✓
Verona/Villafranca	LIPX	4	✓	2030	✓	2030	✓	✓	✓
Verona/Villafranca	LIPX	22	✓	2030	N.A.	N.A.	N.A.		
Ancona/Falconara	LIPY	4	✓	2030	✓	2030	✓	✓	✓
Ancona/Falconara	LIPY	22	✓	2030	✓	2030	✓	✓	✓
Venezia/Tessera	LIPZ	04L	✓	2030	✓	2030	✓	✓	✓
Venezia/Tessera	LIPZ	04R	✓	2030	✓	2030	✓	✓	✓
Venezia/Tessera	LIPZ	22L	✓	2030	✓	2030	✓	✓	✓
Venezia/Tessera	LIPZ	22R	✓	2030	✓	2030	✓	✓	✓
Roma/Ciampino	LIRA	15	✓ [7]	2030	✓	2030	✓	✓	✓
Roma/Ciampino	LIRA	33	✓	2030	✓	2030	✓ [4]	Pending [6]	
Roma/Fiumicino	LIRF	7	✓	2030	✓	2030	✓	✓	✓
Roma/Fiumicino	LIRF	25	✓	2030	✓	2030	✓	✓	✓
Roma/Fiumicino	LIRF	16L	✓	2030	✓	2030	✓	✓	✓
Roma/Fiumicino	LIRF	16R	✓	2030	✓	2030	✓	✓	✓
Roma/Fiumicino	LIRF	34L	✓	2030	✓	2030	✓	✓	✓
Roma/Fiumicino	LIRF	34R	✓	2030	✓	2030	✓	✓	✓
Salerno	LIRI	5	✓	2030	✓	2030	✓	✓	✓

Airport	ICAO Code	RWY	SID PBN		STAR PBN		IAP PBN		
			Obj 4 [*]	Obj 8 [*]	Obj 4 [*]	Obj 8 [*]	RNP APCH LNAV	RNP APCH LNAV/VNAV	RNP APCH LPV
Salerno	LIRI	23	✓	2030	N.A.	N.A.	N.A.		
Napoli/Capodichino	LIRN	6	✓	2030	✓	2030	✓	✓	✓
Napoli/Capodichino	LIRN	24	✓	2030	✓	2030	✓	✓	✓
Firenze/Peretola	LIRQ	5	✓ ICP visual	2030	✓	2030	✓	✓	✓
Firenze/Peretola	LIRQ	23	✓	2030	N.A.	2030	N.A.		
Perugia/S. Egidio	LIRZ	1	✓	2030	✓	2030	✓	✓	N.F. [2]
Perugia/S. Egidio	LIRZ	19	✓	2030	N.A.	N.A.	N.A.		

Legend

- Obj 4 [*] = RNAV1 or RNP1(+RF) SID and STAR - one per IRE - requirement stemming from Commission Implementing Regulation (EU) N.1048/2018 (PBN IR), mandatory as of 25/01/2024
- Obj 8 [*] = RNAV 1 or RNP 1(+RF) for all SID and STARs - requirement stemming from Commission Implementing Regulation (EU) N.1048/2018 (PBN IR), mandatory as of 06/06/2030
- ✓ = Implemented
- N.A. = Lack of regulatory requirement to implement instrument approach procedures to non-instrument runway

Notes:

[*] Last segment visual

[1] Not feasible for 3D due to terrain/obstacle issues, feasibility studies on going for alternative means (e.g. RNP AR).

[2] Not feasible for 3D due to terrain/obstacle issues

[3] Not feasible due to terrain/obstacle issues

[4] Visual maneuvering on prescribed track

[5] New RNP AR APCH activated on trial basis via AIP SUP, exp date 11/06/'26

[6] Due Local Airport Noise Abatement Committee discussion process

[7] As per AIP SUP

Table 8.2. PBN Instrument Flight Procedures Planning and achievements from ENAV's PBN Transition Plan (Dec. 2024)

Updates to ENAV's PBN TP will consider the evolution of the infrastructure and performance of the satellite navigation system (GNSS), the rate of modernization of aircraft avionics, and the internal plans for the rationalization of terrestrial NAVaids.

The availability of GNSS services enabling the most performing PBN applications and with a greater degree of precision creates an opportunity to rationalize the Terrestrial NavAids infrastructure.

NDBs Rationalisation and Decommissioning project was included in ENAV's PBN Transition Plan. NDBs doesn't enable PBN applications, they can be used as a means for position cross-checking and general situational awareness. Moreover, NDBs are conception radio aids obsolete and dated implementation therefore subject to a frequency of failures tends to be higher than other newer navigation systems and for which the maintenance is hampered by the difficulty of finding spare parts. Switching off a NavAid involves two main types of direct savings in terms of CO₂: power supply to terrestrial infrastructures and fuel for aircrafts as flight inspections will no longer be required.



In this perspective, ENAV decided to implement a plan of disposals of the NDBs under its responsibility, to be carried out progressively, informing airspace users with adequate timelines and disposing any back-ups at the level of procedures and / or routes preserving current level of safety.

The project started with a feasibility study in 2018. The decommissioning road map was defined by evaluating the operating/design scenario produced by each individual NBD switch off and substantiated with operational mitigation linked to the possible impact change on large-scale. The project successfully completed the switching off in 2024, counting 34 NDBs shut down over 5 years. Only Cagliari NDB facilities has been retained for flight inspection calibration activities.

The full implementation of the PBN flight instrumental procedures on the national territory, both in operating environments characterized by radar surveillance service provision, and in those without, in which a procedural air traffic control service is applied, fully supported the decommissioning of NDBs at airports where ENAV provides with ANS.

In 2023, as a further step toward a more advanced and efficient navigation infrastructure, ENAV has started the rationalization and decommissioning process for its VOR infrastructure. 14 VORs are proposed to be decommissioned by 2027 in order to be compliant with the principles of Minimum Operation Network design, the plan will be improved once the safety assessment will be completed.

8.2.1.1.2 Technological innovation in support to ATM

All ENAV's technological innovation projects are aimed to introduce or improve significant benefits in terms of Capacity, Fuel efficiency, Predictability, Environmental Sustainability and Resilience. Among its major initiatives, ENAV has programmes in support of:

- Green transition
- Optimization of resources and efficiency
- Digital transition.

NEW ATM SYSTEM FOR ACCs	<p>This programme is aimed at finalizing the delivery end entry into operations of the ENAV new ATM System, based on the developments completed for the FDP Component CoFlight. This ultimate major step of the initiative, following the development and completion of the previous builds, will integrate, starting from 2025 in the operational system being deployed, requirements from the Operations domain as well as different subsystems and ATM tools.</p> <p>The programme will deliver improved efficiency for airspace management and augmented prediction of the expected traffic demand, together with support for cross-border and seamless operations. Airspace users can expect a more safe and efficient provision of ATC services, thanks to better predictions capability, increased flexibility and increased automation.</p>
NEW ATM SYSTEM FOR	<p>The programme objective is to develop and deliver into operations a new ATM Tower platform, supporting both the major Italian Airports (like, for</p>



TWRs	<p>example, Fiumicino, Malpensa, Linate), and the other important airports (Catania, Ciampino, Naples), during the planning and execution of the daily operations. The scope of the programme covers all the 19 Italian Airports that will not be enclosed within the Remote Tower Programme. Special focus will be given in the programme to the use of improved electronic flight strips and improved airport Safety nets.</p> <p>The programme will deliver increased automation for supporting TWR ATCOs in their tasks, as well as increased platform scalability and integration capabilities. In such way, airports will be more integrated in the ATM network with better data exchange and prediction capabilities.</p>
DIGITAL REMOTE TOWERS	<p>This programme is devoted to the delivery of infrastructures and works dedicated to the implementation of the Digital Remote Towers at local airports selected for remotisation. This activity will comprise demolition or adaptation of existing infrastructures, as well as the setup of dedicated pylons and all other infrastructure required by the change of service delivery model at the local airports identified.</p> <p>The implementation of Digital Remote TWRs will allow better optimisation of resources and economies of scale at local RTCC level. It is also expected to increase capacity enabling extension of service level in smaller airports where this was not originally foreseen.</p>
NEW TOWER BUILDINGS AND TECHNICAL BLOCKS	<p>This programme will deal with setup, expansion and renovation of Towers, their Technical Blocks, power stations and other components of the traditional TWRs, in particular the following measures will be undertaken throughout the Italian territory:</p> <ul style="list-style-type: none"> • detailed projects and works for anti-seismic compliance implementation and consolidation in several ENAV sites and premises; • renovation and updating of the different technical blocks for Towers, comprising adaptation of the blocks required for Remote Towers; • electrical power plants and stations: a number of power stations in airport and remote sites will have to be modernised. Detailed projects definition, civil works and infrastructure installation and delivery will be performed; • setup of new infrastructures and buildings at operational sites.
ENERGY SYSTEMS UPGRADE AND OPTIMIZATION	<p>This programme deals with energy production and optimisation of energy consumption at local (airports and CNS sites) and central sites (HQ/ACCs). In particular, the programme will deliver implementation, adaptation, optimization measures of energy systems such as upgrading and energy optimization of buildings.</p> <p>In the framework of this programme, photovoltaic and mini-wind systems will be implemented at several operational sites, several energy backup</p>



systems will be modernised, and air conditioning systems will be modernised or replaced at operational/airport sites.

8.2.1.1.3 Group Environmental Footprint

ENAV's commitment to the environment and combating climate change is based on a strategy aimed at reducing its Carbon Footprint and in supporting the decarbonization of the aviation sector (contributing to the Net Zero European aviation route).

The Group's decarbonization strategy, therefore, has two main strands:

- collaboration with other stakeholders (carriers, airport management companies, aviation industry, national and international regulators, etc.) in order to contribute to the decarbonization of the aviation sector, with projects such as the Free Route, AMAN and A-CDM;
- the reduction of the environmental impact directly generated by the Group's activities.

Thus, alongside the broader goal of contributing to the progressive decarbonization of aviation, as outlined in the preceding pages, the ENAV Group is committed to reducing the carbon footprint of its activities and has defined two main objectives in this regard:

- Achievement of SBTi (Science Based Targets initiative) targets to 2030;
- Maintaining Carbon Neutrality, achieved in 2022.

The ENAV Group has defined climate targets for 2030, which include, in addition to the reduction of at least 70% of Scope 1 and Scope 2 emissions compared to 2019 (already achieved at the end of 2022), also a reduction of at least 13.5% of Scope 3 emissions in the "Capital goods", "Fuel and Energy-related activities" and "Employee Commuting" categories.

These emission reduction targets have been validated by SBTi, the initiative born out of a partnership between CDP (formerly the Carbon Disclosure Project), UN Global Compact, WRI (World Resources Institute) and WWF in order to guide the private sector to take climate action through science-based emission reduction targets.

The SBTi-validated targets define the commitments of those companies that are in line with the level of decarbonization needed to hold the global temperature increase below 1.5°C compared to pre-industrial temperatures.

By the end of 2023, the ENAV Group has managed to reduce its direct and indirect (Scope 1 and 2) climate-altering emissions by more than 86% compared to 2019. The purchase of carbon credits (VERRA certificates) for the portion of emissions not yet reducible (about 14%) has enabled ENAV to maintain carbon neutrality (achieved at the end of 2022).

While, in 2023, Scope 3 emissions in SBTi target, compared to 2019, decreased by 8%, approaching the -13.5% target to 2030.

The reduction in emissions is the result of several initiatives implemented over the past few years:

- purchase of electricity from renewable sources certified by Guarantee of Origin (GO), which



in 2023 covers 95% of the Group's electricity needs;

- interventions aimed at the energy efficiency of ENAV Group's assets;
- progressive increase in the share of self-generated energy from renewable sources;
- replacement of the company car fleet with electric/hybrid/plug-in vehicles;
- development of energy research and innovation projects.

In addition, the ENAV Group, with a view to new climate targets, is evaluating the possibility of submitting the Net Zero target under the SBTi guidelines; this ambitious project involves reducing the remaining emissions, with a focus on emissions arising along the value chain (Scope 3). In fact, the Group is considering the implementation of specific corporate projects and initiatives that will be mainly related to the following aspects:

- further drive for energy efficiency measures;
- where possible, increased supplier involvement and further revision of green procurement policies;
- green mobility plans dedicated to ENAV Group people, including innovative work solutions to be progressively extended to an increasing portion of the corporate population.

The goal is to contribute increasingly to the transition to a more sustainable aviation system, aligning with global climate requirements and strengthening ENAV's leadership in the sector.

8.2.1.1.4 Research and Development: the SESAR Programme

The Flexible Airspace Management and Free Route is one of the six ATM Functionalities (Afs) to be implemented across European ATM Network up to 2027 (Commission Implementing Rule (EU) 2021/116), which provides for the implementation (by FL310+) of Direct Routing operations (by 1 January 2018) and operations Free Routing (by 1 January 2022).

In this context ENAV, Italy's main Air Navigation Service Provider, successfully carried out two SESAR initiatives: WE-FREE (2013) and the follow-up project FREE Solutions (Free Route and Environmental Efficient Solutions, 2016). These two projects paved the way to the deployment of Free Route airspace in Italy, in operations in Italy above FL335+ since Dec. 2016 and then, as from May 2018, above FL305+, with almost four-year advance compared to the implementing rule provision. Today free route is operational from FL195 and extended to neighbouring countries (SCSI FRA).

FREE Solutions aimed at completing, between 2015 and 2016, a cycle of demonstration flights in operating cross-FAB environment (Blue Med and FABEC specifically) to prove the feasibility and applicability of Direct Routing/Free Routing concepts and the definition of technical and operational requirements essential for the implementation of the Free Routing. It was carried out in collaboration with a significant group of ANSP and Airspace User. The project was launched under the guidance of ENAV, in September 2014. Just six months after, the first set of demonstration flights was successfully completed. Two weekends were dedicated to the trials and more than 120 flights were operated by project partner airlines on point-to-point connection between European airports with optimized City-Pairs routes. A first analysis of the data collected



during this session confirmed and enhanced the preliminary expectations: each day 1450Kg of fuel on average were saved, resulting in lower emission CO₂ equal to 4400Kg.

Other demonstration flights were dedicated to the identification of specific Direct Routes and to a Free Route specific Airspace Area (FRA), trans-national and multi-FAB, where users were able to plan their routes indicating just an entry point, an exit point and a limited (or null) set of intermediate points, freeing themselves from the current, at that time, network of ATS routes.

Strongly convinced of the pivotal role of the SESAR Programme in the Single European Sky framework to conduct a delivery-oriented and performance-driven Research & Innovation (R&I) in ATM, ENAV Group is fully committed to the SESAR Programme by participating in more than 160 R&I projects, ranging from the first two development phases of the Programme, referred to as SESAR1 (2009-2016) and SESAR2020 (2016-2023), till to the current third phase SESAR3 – Digital European Sky (DES), with timeframe 2022-2031, where ENAV Group has currently 19 projects running.

SESAR initiative is an opportunity to drive the change towards the new generation of a European ATM system - safe, modern, sustainable and resilient - satisfying the needs of its customers.

The SESAR Programme generates an innovation pipeline towards deployment, by demonstrating the viability of technological and operational ATM solutions in larger and more operationally integrated environments. SESAR is ensuring a continuous flow of research results moving towards innovation and deployment. The SESAR innovation life-cycle addresses TRLO-TRL8 (Technology Readiness Level) and encompasses Exploratory Research (ER) projects (TRLO-TRL2), Industrial Research (IR) projects (TRL4-TRL6) and Digital Sky Demonstrator (DSD) initiatives (TRL7-TRL8). So far, the new phase SESAR3 has launched 3 DSD Calls, 2 ER Calls and 1 IR Call with relevant awarded projects ongoing, further Calls will follow in the next years.

SESAR Programme sees ENAV Group committed to the study of several operational concepts and technologies selected in line with national and European priorities. ENAV research activities encompass all ATM domains (airports, en-route and terminal areas including network, planning and interoperability aspects), cover the complete ATM concept maturity R&I life-cycle (from VI to V3), tackle all validation techniques (Fast Time and Real Time simulations, Shadow Mode and Live trials) and address all performance areas - Safety, Capacity, Costs Efficiency, Human Factor and Environment.

Main ENAV Group R&I topics focus on:

- Aviation Green Deal
- Digital TWR
- Trajectory Based Operations
- Artificial Intelligence in ATM
- ATM Tools evolution
- Safety Nets
- Delegation of Airspace/Virtual Centre
- Service Delivery Model for ATM



- Network services
- Enhanced Arrival Procedures
- U-space/UTM/Innovative Air Mobility
- CNS optimisation, modernisation and resilience
- Higher Airspace Operations

8.2.2 AIRCRAFT OPERATORS

8.2.2.1 AIR DOLOMITI

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Fleet renewal "nose-to-tail" starting mid 2030 with aeroplanes equipped with geared turbofan engines.
	Retrofitting and upgrade improvements on existing aircraft	2021-2025: wheel fairings installed on MLG, reducing drag during all flight phases. From 2025, introduction of new aeroplanes' avionics that optimises climb/cruise/descend speeds and descend path.
Alternative Aviation Fuels	Standards / requirements for SAF use	<u>Previous activities:</u> Voluntary compensation of passengers on COMPENSAID platform through SAF or environmental protection projects <u>Planned activities:</u> Uplift according to mandate introduced by "RefuelEU Aviation" Regulation.
Operational improvements	More efficient ATM planning, ground operations, etc.	ATM improvement considered from 2036 onwards. SIDs/STARs improvement considered starting from 2031 onwards. RNP AR generic to reduce fuel consumption by shortening the approach while performing a continuous descend.
	Best practices in operations	Included in the mitigation assessment
	Optimized aircraft maintenance	Engine wash included in the mitigation assessment

Table 8.3. Mitigation measures selected by Air Dolomiti

8.2.2.2 CARGOLUX ITALIA

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Plan for fleet renewal
	Retrofitting and upgrade improvements on existing aircraft	2021-2025: wheel fairings installed on MLG, reducing drag during all flight phases. From 2025, introduction of new aeroplanes' avionics that optimises climb/cruise/descend speeds and descend path.
Alternative Aviation Fuels	Standards / requirements for SAF use	Uplift according to mandate introduced by "RefuelEU Aviation" Regulation.
Operational improvements	Best practices in operations	Included in the mitigation assessment (reduced flap at landing)

Table 8.4. Mitigation measures selected by Cargolux Italia



8.2.2.3 ITALIA TRASPORTO AEREO (ITA)

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Fleet renewal program with new-gen aircraft 60% in 2024, expected 90% in 2027. Benefit expected in full up to 2040.
	Retrofitting and upgrade improvements on existing aircraft	Effects considered after when fleet age will grow again over (> 20yr).
Alternative Aviation Fuels	Standards / requirements for SAF use	<p><u>Previous activities:</u> SAF used occasionally from 2021. Launch in 2023 of the "Fly with SAF" program for cargo flights. CHOOSE platform for passenger compensation for the use of SAF. Launch of the "Fly with SAF" program with the agreement with DB Schenker in Italy.</p> <p><u>Planned activities:</u> Uplift according to mandate introduced by "RefuelEU Aviation" Regulation.</p>
Operational improvements	Best practices in operations	Benefits expected by AI and machine learning implementation
	Optimized aircraft maintenance	Included in the mitigation assessment (reasonable when fleet age will grow again over 20 years)
	Selecting aircraft best suited to the mission	Included in the mitigation assessment (impact expected with investments in AI)

Table 8.5. Mitigation measures selected by Italia Trasporto Aereo

8.2.2.4 NEOS

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	The current 737-800 fleet will be phased out by 2030 and replaced with 737-8 aircraft, with fuel consumptions and emission savings of approximately 15% per aircraft. From 2040, an upgrade of the 787 fleet will be started with estimated fuel consumption and emission savings of 20%.
Alternative Aviation Fuels	Standards / requirements for SAF use	Uplift according to mandates introduced by "RefuelEU Aviation" Regulation.
Operational improvements	Best practices in operations	New software for Cost Index optimization in use from November 2024 and for optimization of climb and approach phases from 2025.

Table 8.6. Mitigation measures selected by Neos



8.2.2.5 POSTE AIR CARGO

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Based on substitution of 3 out five planes in the fleet 3 737-800 replacing the 737-400 now in the fleet. Hypothetical saving per plane 10%
Alternative Aviation Fuels	Standards / requirements for SAF use	<u>Previous activities:</u> Experimental activities on the Bari-Brescia route in 2022 <u>Planned activities:</u> Uplift according to today's Poste Italiane policy. Collaboration agreement with ENILIVE which also includes the supply of JETA1+Eni Biojet.

Table 8.7. Mitigation measures selected by Poste Air Cargo

8.2.2.6 RYANAIR

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Plan for fleet renewal.
Alternative Aviation Fuels	Standards / requirements for SAF use	Uplift according to mandate introduced by "RefuelEU Aviation" Regulation. Letter of intent with Eni Live for the long-term supply of SAF at Italy's selected airports, that would enable Ryanair to access to up to 100,000 tons of SAF between 2025 and 2030.
Operational improvements	Best practices in operations	Flight speed optimisation

Table 8.8. Mitigation measures selected by Ryanair

8.2.2.7 SIRIO S.P.A.

Category	Measure	Comments
Technology and Standards	Purchase of new aircraft	Plan for fleet renewal.
Alternative Aviation Fuels	Standards / requirements for SAF use	Uplift according to mandates introduced by "RefuelEU Aviation" Regulation.

Table 8.9. Mitigation measures selected by Sirio

8.2.3 AIRPORT MANAGING BODIES

8.2.3.1 AEROPORTO DI BOLOGNA S.P.A.

The company manages the Bologna airport.

Category	Measure	Comments
Alternative Aviation Fuels	Standards / requirements for SAF use	Introduction of economic incentive for the use of SAF at the airport
Operational improvements	More efficient ATM planning, ground operations, etc.	Start of studies and evaluations for the implementation of an Airport Operations Centre (APOC)

Table 8.10. Mitigation measures selected by Aeroporti di Bologna S.p.A.



8.2.3.2 AEROPORTI DI PUGLIA S.p.A.

The company manages a network including Bari, Brindisi, Foggia and Taranto airports. The data made available are for the airports of Bari and Brindisi.

8.2.3.2.1 Bari airport

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	In 2019, the RWY 07/25 was extended from 2444 m to 3000 m, which benefits arriving aircraft from RWY 07 by reducing the taxiing distance by 22% when using a closer intermediate exit to the stands.
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	The installation of 16 fixed ground power supply systems and 6 preconditioning systems allows the APU to be turned off for approximately 85% of the parking operations conducted throughout the year.

Table 8.11. Mitigation measures selected by Aeroporti di Puglia S.p.A. for Bari airport

8.2.3.2.2 Brindisi airport

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	In 2021, with the relocation of the RWY threshold, the intersection take-off B was also introduced, facilitating taxiing and take-off operations for aircraft coming from the parking area
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Since 2024, push-back with engine off until reaching the intersection with the apron taxiway, at which point the engines are started before taxiing onto the runway. This change leads to improved acoustic and environmental conditions in the area in front of the terminal, as well as enhanced airport safety.

Table 8.12. Mitigation measures selected by Aeroporti di Puglia S.p.A. for Brindisi airport



8.2.3.3 AEROPORTI DI ROMA S.P.A.

Aeroporti di Roma (AdR) manages the airports of Rome Fiumicino and Ciampino.

Category	Measure	Comments
Alternative Aviation Fuels	Standards/requirements for SAF use	<p><u>Previous activities:</u></p> <p>SAF transport logistics tests in partnership with ENI and ITA Airways, participation in EU project "ALIGHT", among the promoters of the "Pact for the decarbonisation of air transportation" initiative.</p> <p><u>Planned activities:</u></p> <p>Incentive programme to promote the availability and use of SAF at Ciampino airport, for aircraft that carry out non-scheduled commercial activities (1.200 €/ton for a use of SAF between 2% and 5%, 1800 €/ton for uplift above 5%. Total allocation 300 k€)</p>
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Starting in 2033, the fourth runway is expected to be operational in Fiumicino airport. Using specific simulations, the taxi in and out times were estimated, highlighting how the planned layout (i.e., the combination consisting of the fourth runway, taxiways, and development to the east of the aprons) would allow a reduction in average taxi time of approximately 10% with benefits in terms of emissions as well.

Table 8.13. Mitigation measures selected by Aeroporti di Roma S.p.A. for Rome Fiumicino and Ciampino airports

At Rome Fiumicino (FCO), the AMAN and the DMAN systems are operational and both managed by ENAV, which also provided for their development and implementation, so that arrivals and departures can be optimized to fit the air traffic understood as number of movements and type of aircraft (WB/NB). ADR asked ENAV to maintain AMAN and DMAN at the best of technological evolution and integration in order to ensure the best operational performances and capacity.

FCO is an airport certified by Eurocontrol for A-CDM operations since 2014. All airport stakeholders have access to the IT platform that supports CDM operations in order to ensure maximum sharing of information necessary to optimize the traffic flows of flights departing from the airport. The A-CDM platform is constantly updated in order to ensure its alignment with any changes in the airport lay-out, taxi times, etc. All this minimizes taxiing times from the stand to the runway.

ADR actively takes part in the working tables of the Italian National Airspace Strategy (NAS) in agreement with key stakeholders, including Enac, IATA, ENAV, AMI, Government, Airports, Airlines, where the issues related to the strategies to reduce fuel consumption during taxiing have been faced, and in particular the possibility of using the Engine-Out taxiing. At FCO it is already possible to apply Engine-Out at the discretion of the individual air carrier. The E-Taxi solution at



the moment requires that manufacturers develop a technological evolution of aircraft, with medium-to long-term implementation timelines. ADR participates in the European Tables that discuss this topic.

FCO has 136 stands, 115 of which with fixed assets for 400 Hz charging and PCA. Therefore, about 85% of the stands allow the aircraft to avoid switching on the APU.

An on-site photovoltaic system program is being implemented at FCO, in order to be able to produce and self-consume renewable energy. A photovoltaic system will also be built at CIA over the next few years to cover the airport's needs. At both airports, the share of energy drawn from the electrical grid comes exclusively renewable sources (attestation through GO certificates).

ADR, with regard to its emissions (Scope 1 and scope 2), has set the goal to achieve Net Zero by 2030. That ambitious target includes, among other actions: production of energy through renewable sources and choice of sustainable fuels (e.g. biomethane or HVO). As per the Net zero goal, ADR will generate or purchase 100% of clean energy consumed.

FCO has three runways and a taxiway system that allow runway entry and alternate take-off points, that can be used by pilots who need less runway length at take-off, or in cases where the Control Tower wishes to improve the take-off sequence for capacity or taxiing reasons. In the short term, the doubling of the Bravo taxiway parallel to runway 07-25 will be completed with benefits in ground handling; and in the long term a fourth runway is planned to be constructed at FCO, with a flexible taxiing system capable of allowing entry and exit from the runway at multiple points to reduce runway occupancy time.

ADR, together with the Milan airports' managing body, SEA, has been selected by public tender to implement a pilot project aimed at the integration of sustainable fuels in the airport logistic chain, such as hydrogen and SAF. Within this project, solutions are being studied in order to have a benefit on CO₂ emissions not only of ADR but also of the stakeholders involved in airport logistic, with positive effects on the surrounding area as well.

8.2.3.4 GEASAR S.p.A.

The company manages the Olbia airport.

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Included in the mitigation assessment (Construction of taxiways)
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Included in the mitigation assessment (Installation of GPU and PCA)

Table 8.14. Mitigation measures selected by GEASAR S.p.A. for Olbia airport



8.2.3.5 GE.S.A.C. S.p.A.

The company manages the airports of Naples and Salerno. The data made available are for the airport of Naples.

Category	Measure	Comments
Operational improvements	More efficient ATM planning, ground operations, etc.	New initial climb procedure that saves 5 minutes of flying time
	Airfield improvements - Construction of runways/taxiways/exits	New Apron configuration

Table 8.15. Mitigation measures selected by GE.S.A.C. S.p.A. for Naples airport

8.2.3.6 GES.A.P. S.p.A.

The company manages the Palermo airport.

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	It is expected that the construction of speed-exit taxiway will be completed in 2027 and that, therefore, a benefit in terms of fuel reduction as a result of the construction of the infrastructure can be obtained as early as 2028. It is estimated that the reduction in taxiway times with this new infrastructure is close to 10%.
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	400 Hz infrastructure installation: starting from 2028, there will be a reduction of about 70% compared to GPU fuel consumption prior to the construction of the infrastructure (estimations include the use of the GPUs at night for maintenance activities)

Table 8.16. Mitigation measures selected by GES.A.P. S.p.A. for Palermo airport

8.2.3.7 SAC S.p.A.

The company manages the airports of Catania and Comiso. The data made available are for the airport of Catania.

Category	Measure	Comments
Operational improvements	More efficient ATM planning, ground operations, etc.	A-CDM (U.S. version) from 2025
	Airfield improvements - Construction of runways/taxiways/exits	New runway and relative taxiways according to Masterplan 2030

Table 8.17. Mitigation measures selected by SAC spa for Catania airport



8.2.3.8 SACAL S.p.A.

The company manages an airport network consisting of Crotone Airport, Lamezia Terme Airport and Reggio Calabria Airport. The data made available are for the international Airport of Lamezia Terme.

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Construction of new taxiway in 2020-2021

Table 8.18. Mitigation measures selected by SACAL S.p.A. for Lamezia Terme Airport

8.2.3.9 SACBO S.p.A.

The company manages the Bergamo Orio al Serio Airport.

Category	Measure	Comments
Operational improvements	More efficient ATM planning, ground operations, terminal operations, en-route operations, airspace design and usage, aircraft air navigation capabilities	Measures to improve fuel-efficient departure and approach procedures: A-CDM (non-U.S. version)
	Airfield improvements - Construction of runways/taxiways/exits	Airfield improvements 400Hz System + eGPU
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Airfield improvements New Taxiways

Table 8.19. Mitigation measures selected by SACBO S.p.A. for Bergamo Orio al Serio Airport

8.2.3.10 SAGAT S.p.A.

The company manages and develop Turin Airport.

Category	Measure	Comments
Alternative Aviation Fuels	Standards / requirements for SAF use	Partner of the EU project "TULIPS" and member of AZEA.
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Rapid Exit Taxiway (RET) construction that will imply the reduction of approximately 1 min of taxi for the incoming flights.

Table 8.20. Mitigation measures selected by SAGAT S.p.A. for Turin airport

In addition, thanks to the progressive ground support equipment electrification, a strong contribution to CO₂ reduction is expected (up to 150 ton/year starting from 2035), but it has not been considered since the mitigation assessment is strictly focused on fuel consumption reduction.



8.2.3.11 SAVE GROUP

SAVE Group manages and coordinates the Italy's North-East Airport system, which consists of Venice, Treviso, Verona and Brescia airports.

8.2.3.11.1 Venice airport

Venice Airport is managed by the company SAVE S.p.A.

Category	Measure	Comments
Operational improvements	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Fixed electrical ground power are already in place. The installation of pre-conditioned air unit will start in 2026

Table 8.21. Mitigation measures selected by SAVE S.p.A for Venice Airport

In order to achieve the targets, set by the Paris Agreement, SAVE seeks to ensure that Venice Airport achieves “Net Zero Carbon Emissions” by 2030, 20 years earlier than the target set for the European airport sector. The three main focus areas of our Roadmap are:

- management of the decarbonization process in parallel with the growth in energy demand;
- building energy demands;
- stakeholder engagement.

The 2037 Masterplan has analysed interventions to efficiently improve energy, environmental sustainability and the quality of passenger services and comfort at the airport. These interventions consider:

- the use of local resources while best protecting the region;
- the electrification of thermal and refrigeration power generation;
- the decarbonization of energy production processes on site.

These guidelines not only contribute to achieving the targets set, but also meet the needs of:

- energy independence and autonomy;
- energy source reliability and redundancy;
- resilience of the system to changes in the climate or landscape due to high elasticity;
- opportunity for high return on investment;
- high environmental benefits for the surrounding area;
- upgrading of regional infrastructure and sustainable mobility.

In addition, the use of new technologies provides useful tools for local energy transition. These represent concrete possibilities for achieving and improving sustainable mobility and the circular economy:

- electric car charging network integrated into a smart grid comprising an on-site generation system and storage system;



- production and use of green hydrogen to decarbonize on-site transportation, and alternative fuels for aircraft or other vehicles.

8.2.3.11.2 Treviso airport

Treviso Airport is managed by the company AER TRE S.p.A., which is part of the SAVE Group.

Category	Measure	Comments
Operational improvements	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	From 2030: provision of electricity supply to stationary aircraft (by e-GPU and GPU powered by HVO).

Table 8.22. Mitigation measures selected by AER TRE S.p.A for Treviso Airport

8.2.3.11.3 Verona airport

Verona Airport is managed by the company Aeroporto Valerio Catullo di Verona Villafranca S.p.A., which is part of the SAVE Group and also manages Brescia Airport.

Category	Measure	Comments
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Construction of new Rapid Exit Taxiway (RET).
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Included in the mitigation assessment

Table 8.23. Mitigation measures selected by Aeroporto V. Catullo di Verona Villafranca S.p.A. for Verona Airport

8.2.3.12 SEA S.p.A.

The group manages and develop the Linate and Malpensa airports.

8.2.3.12.1 Milan Linate airport

Category	Measure	Comments
Alternative Aviation Fuels	Standards / requirements for SAF use	Incentives to use SAF through incentives to aircraft operators of 500€/ton in 2023 and 800€/ton in 2024, with a funding allocation of 450,000€ in 2023 and 500,000€ in 2024.
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Included in the mitigation assessment
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Included in the mitigation assessment

Table 8.24. Mitigation measures selected by SEA S.p.A. for Milano Malpensa airport



8.2.3.12.2 Milan Malpensa airport

Category	Measure	Comments
Alternative Aviation Fuels	Standards / requirements for SAF use	Incentives to use SAF with reimbursement to operators of 500€/ton in 2023 and 800€/ton in 2024, with a funding allocation of 450,000€ in 2023 and 500,000€ in 2024.
Operational improvements	Airfield improvements - Construction of runways/taxiways/exits	Included in the mitigation assessment (from 2029)
	Airfield improvements - Installation of fixed electrical ground power/pre-conditioned air	Included in the mitigation assessment

Table 8.25. Mitigation measures selected by SEA S.p.A. for Milano Linate airport

9 IMPLEMENTED MEASURES SCENARIOS

According to the ICAO Guidance (Ref. [175]), the section dedicated to expected results after taking CO₂ mitigation actions, should provide the following information:

- annual fuel consumption, CO₂ emissions and traffic data after the implementation of mitigation measures from the first implementation year to at least 2050;
- projected future fuel consumption, CO₂ emissions and traffic data after the implementation of selected mitigation measures should be reported for each year up to at least 2050).

9.1 METHODOLOGY

The methodology adopted to elaborate the implemented measures scenario is based on the collection of data on actions put in place or planned by stakeholders - ANSPs, AOs and AMBs - in order to reduce the fuel consumption of air transport. The collection of data has been organized by Enac providing the stakeholders with a spreadsheet following the template in Table 9.1.

Category	Sub-category	Expected Annual Fuel Savings (5-year average)			Recipients		
		2021 - 2025	...	2045 - 2050	ANSPs	AOs	AMBs
Technology and Standards	Purchase of new aircraft	[*]	[*]	[*]		✓	
	Retrofitting and upgrade improvements on existing aircraft	[*]	[*]	[*]		✓	
Alternative Aviation Fuels	Standards / requirements for SAF use	[*]	[*]	[*]		✓	
Operational improvements	More efficient ATM planning, ground operations, terminal operations, en-route operations, airspace design and usage, aircraft air navigation capabilities	[*]	[*]	[*]	✓	✓	✓
	Best practices in operations	[*]	[*]	[*]		✓	
	Optimized aircraft maintenance	[*]	[*]	[*]		✓	
	Selecting aircraft best suited to the mission	[*]	[*]	[*]		✓	
	Airfield improvements	[*]	[*]	[*]			✓

[*] Instructions: use data from your organization estimates or calculate the fuel savings by applying the formula provided in the sheet "Rules of Thumb" (derived from ICAO Doc. 9988). Report % variations or the absolute values of expected annual fuel savings ([tons]).

Table 9.1. Template for the collection of data from the stakeholders

The following remarks are worth to be made:



- for coherence in the comparison between the baseline and the implemented measures scenarios, it is assumed that the traffic data are not affected by the implementation of the mitigation measures and therefore the RTKs data reported in Table 7.5 and Table 7.6 are unvaried;
- for the sake of simplicity, the stakeholders have been asked to aggregate the expected fuel savings over 5-years periods (2021 – 2025; 2026 – 2030; 2031 – 2035; 2036 – 2040; 2041 – 2045 and 2045 – 2050) and report the average values;
- as column “Recipients” in Table 9.1 suggests, the distribution of the data collection form among the stakeholders has been differentiated in order to minimize the possible overlapping between the mitigation actions declared by them. In order to avoid the multiple counting of fuel savings, data provided under the sub-category “More efficient ATM planning, etc.” have been object of a detailed post-processing;
- the “Rules of Thumb”, derived from ICAO Doc. 9988 as mentioned in the instructions of the template, which the stakeholders have been provided with are reported in the Appendix B of the present document;

A large number of stakeholders have provided valuable information by responding to the fuel saving survey. More in details, the representativeness of the data collected is reported in Table 9.2, where the fraction of passengers from international flights attributed to Italy has been used as a metric.

Metric: fraction of passengers from international flights attributed to Italy	ANSPs	AOs	AMBs
according to ICAO method (State of Registry)	100%	77%	83%
according to IPCC method (State of Origin)	100%	37%	83%

Table 9.2. Representativeness of fuel savings data collection

The response rate has been satisfactory in all the cases, with the only exception for the combination AOs / IPCC method, since the airlines departing from Italian airports are much more of those registered in Italy and therefore it is difficult to engage a significant part of them.

The representativeness in Table 9.2 has been evaluated using the air traffic data collected and published by Enac (Ref. [182]), with 2022 as year of reference. The same data have been used to weight the impact of the fuel savings information provided by each stakeholder within the scenarios built on the ICAO or the IPCC attribution method. The following examples can clarify the adopted approach:

- if in 2022 an AO registered in Italy has moved 20% of the passengers transported by all the AOs registered in Italy and 5% of the passengers flying from Italian airports over international routes, the declared fuel savings is reduced by the factors 0.20 and 0.05 within the scenarios obtained according to ICAO and IPCC methods, respectively;
- if in 2022 an AO not registered in Italy has moved 25% of the passengers flying from Italian airports over international routes, the declared fuel savings is not considered when applying



the ICAO method and reduced by the factor 0.25 when applying the IPCC method.

As a final remark concerning the methodology, the scenarios obtained with the representativeness indicated in Table 9.2 have been extrapolated to estimate the potential CO₂ reduction associated to the engagement of all the stakeholders that have a role in the international air transport taking place in Italy. Therefore, two possible mitigation cases have been included in the results: a “conservative” case related to the partial representativeness of the collected data and an “enhanced” case derived from the above-mentioned extrapolation.

The presentation of the implemented measures scenarios in terms of fuel consumption, CO₂ emissions and traffic data are reported and discussed in Section 9.2.

9.2 RESULTS

The description of these national contributions to measures taken collectively throughout Europe is an illustration of the State's involvement in its implementation and any quantified benefits should not be added to the benefits presented in the European common section

Data about the projected future fuel consumption, CO₂ emissions and traffic data, this latter unvaried as previously said, are reported for each five-year period up to 2050 in Table 9.3 and Table 9.4, for ICAO and IPCC attrition method respectively.

The total mitigation of CO₂ emissions, graphically reported in Figure 9.1 and Figure 9.2, is achieved both through fuel savings measures, which lead to direct CO₂ reduction, and by replacing conventional jet-fuels with Alternative Aviation Fuels (AAF), which provide environmental benefits in terms of avoided CO₂ emissions. The formula adopted to calculate total mitigation of CO₂ emissions is the following:

$$\text{CO}_2 \text{ Emissions Mitigation} = 3.16 \cdot \left\{ \text{FS} + \sum \left[M_{\text{AAF}} \cdot \left(1 - \frac{\text{LC}_{\text{AAF}}}{89 \text{ gCO}_2\text{e/MJ}} \right) \right] \right\}$$

where:

- FS is the fuel saving from all the mitigation measures excluding those related to the use of Alternative Aviation Fuels;
- M_{AAF} is the mass of Alternative Aviation Fuel replacing conventional jet-fuels, which in the present document only refer to SAF compliant to the European regulations and directives (Ref. [178]);
- LC_{AAF} is the life cycle emissions of the considered amount of Alternative Aviation Fuels (in gCO_{2e}/MJ);
- 89 gCO_{2e}/MJ is the life cycle emissions adopted for fossil-based jet-fuels.

As explained in the previous section, for each attribution method both the “conservative” and “enhanced” cases have been considered. Whereas Table 9.3 and Table 9.4 refer only to the “conservative” case, Figure 9.1 and Figure 9.2 show both of them.



Year	Italy – ICAO method (Conservative case)						
	RTK [M tons km]	FS [k tons]	FS/Baseline Fuel Burnt ratio	Reduced CO ₂ from FS [k tons]	Avoided CO ₂ from AAF [k tons]	Mitigated/ Baseline CO ₂ ratio	CO ₂ emissions after mitigation [k tons]
2025	5803	102	6%	322	39	7%	4956
2030	6903	157	8%	495	184	11%	5647
2035	8003	227	10%	719	351	15%	6264
2040	9103	334	13%	1054	972	24%	6316
2045	10203	469	16%	1482	1752	35%	6115
2050	11303	493	15%	1557	2663	41%	6138

Table 9.3. Data of the implemented measures scenario (Italy-ICAO method)

Year	Italy – IPCC method (Conservative case)						
	RTK [M tons km]	FS [k tons]	FS/Baseline Fuel Burnt ratio	Reduced CO ₂ from FS [k tons]	Avoided CO ₂ from AAF [k tons]	Mitigated/ Baseline CO ₂ ratio	CO ₂ emissions after mitigation [k tons]
2025	15099	65	2%	206	9	2%	11906
2030	17649	252	6%	795	333	8%	13041
2035	20199	534	10%	1688	984	16%	13544
2040	22749	587	10%	1854	1724	20%	14686
2045	25299	688	11%	2174	2406	23%	15731
2050	27849	735	10%	2323	3775	27%	16261

Table 9.4. Data of the implemented measures scenario (Italy-IPCC method)

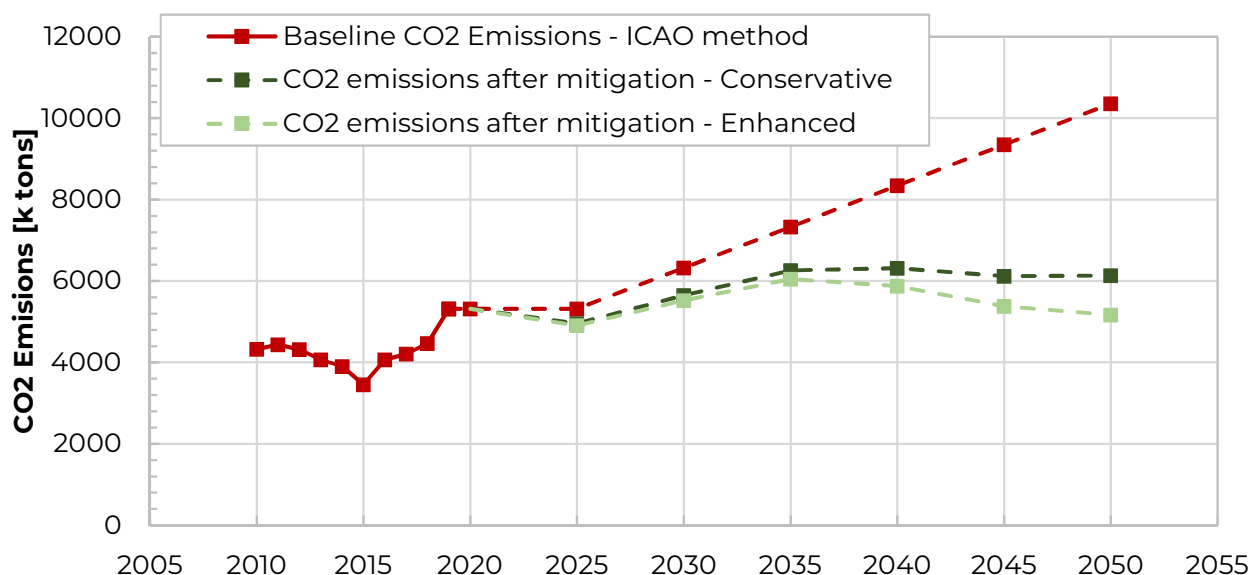


Figure 9.1. Implemented measures scenario: CO₂ emissions from international aviation (Italy-ICAO method)

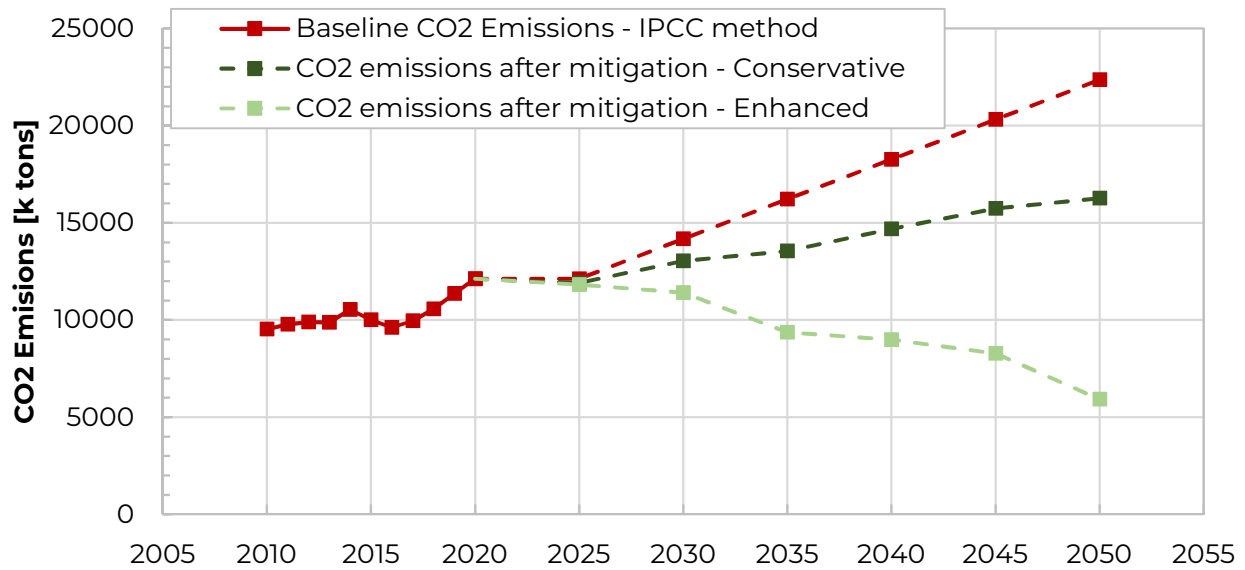


Figure 9.2. Implemented measures scenario: CO₂ emissions from international aviation (Italy-IPCC method)

The previous results are also presented in Figure 9.3 and Figure 9.4, for ICAO and IPCC method respectively, highlighting the impact of the measures implemented by each stakeholders' group on CO₂ emissions mitigation. Such results underline the significant role of AOs, which have the possibility to implement a wide variety of measures, among which the replacement of conventional fossil-based fuels with SAF.

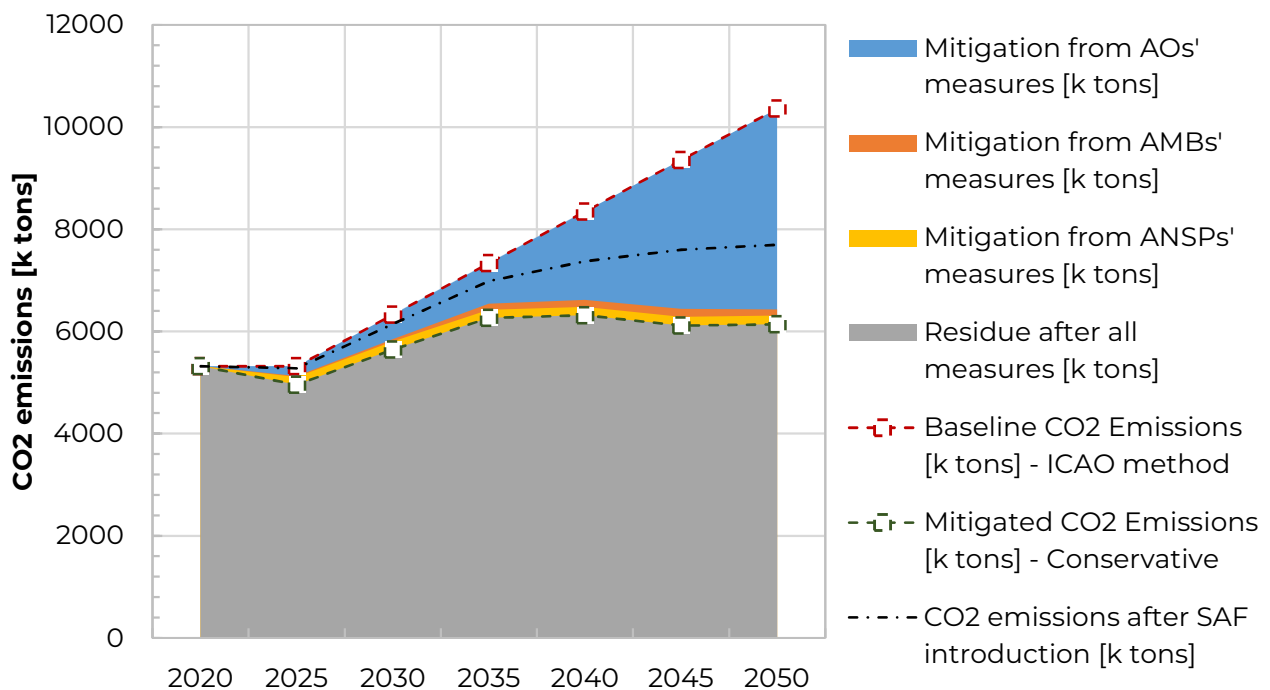


Figure 9.3. Impact of stakeholders' measures on CO₂ emissions mitigation (Italy-ICAO method)



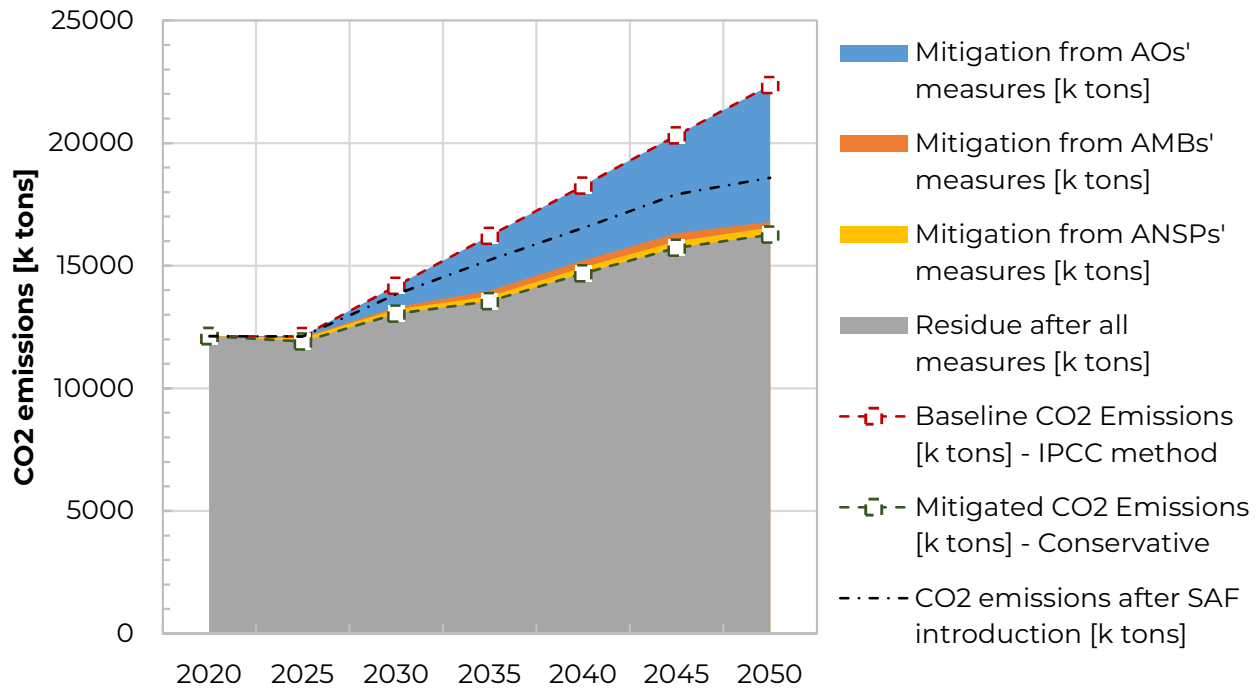


Figure 9.4. Impact of stakeholders' measures on CO₂ emissions mitigation (Italy-IPCC method)

As Figure 9.3 and Figure 9.4 show, the benefits coming from the introduction of SAF provide a significant part of the overall CO₂ emissions mitigation. The main driver for this trend is the introduction of a SAF mandate in Europe through the “RefuelEU Aviation” Regulation (Ref. [179]), which defines the minimum shares of SAF that in the period 2025-2050 fuel suppliers must make available at main EU airports, defined as “Union Airports” (see Figure 2.3 for those located in Italy according to 2024 traffic data). As indicated in Figure 9.5, the mandate covers both the totality of sustainable aviation fuels and the subcategory of synthetic aviation fuels.

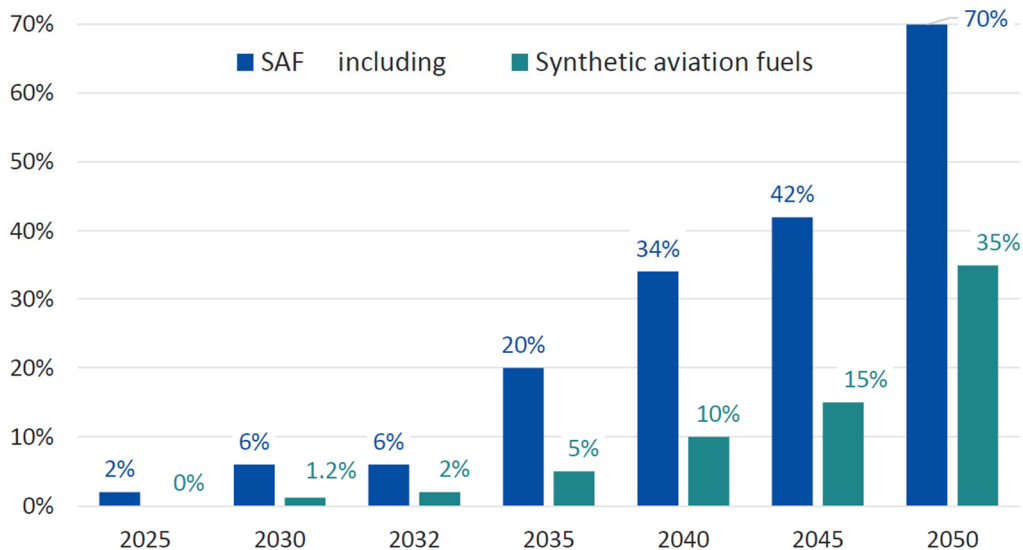


Figure 9.5. Minimum shares of SAF and synthetic fuels introduced by the RefuelEU Aviation Regulation (source: European Commission, DG-MOVE, Aviation Policy Unit)

The following Figure 9.6 and Figure 9.7, related to ICAO and IPCC attribution methods respectively, provide more details about the impact of each measure in term of CO₂ emissions mitigation.

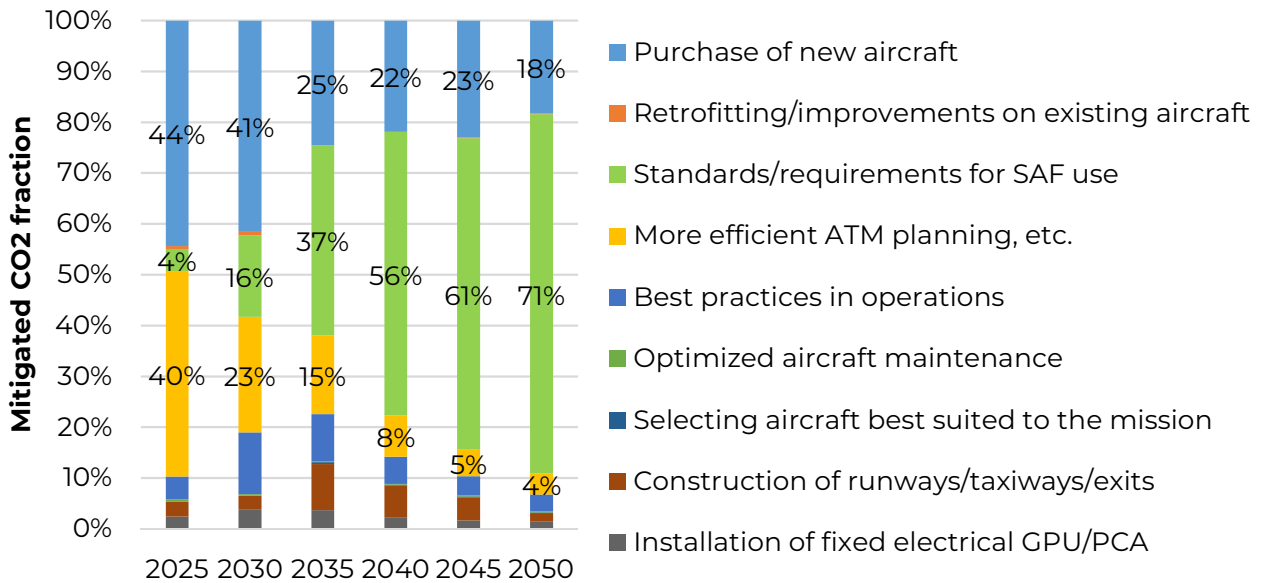


Figure 9.6. Impact of measures on CO₂ emissions mitigation (Italy-ICAO method)

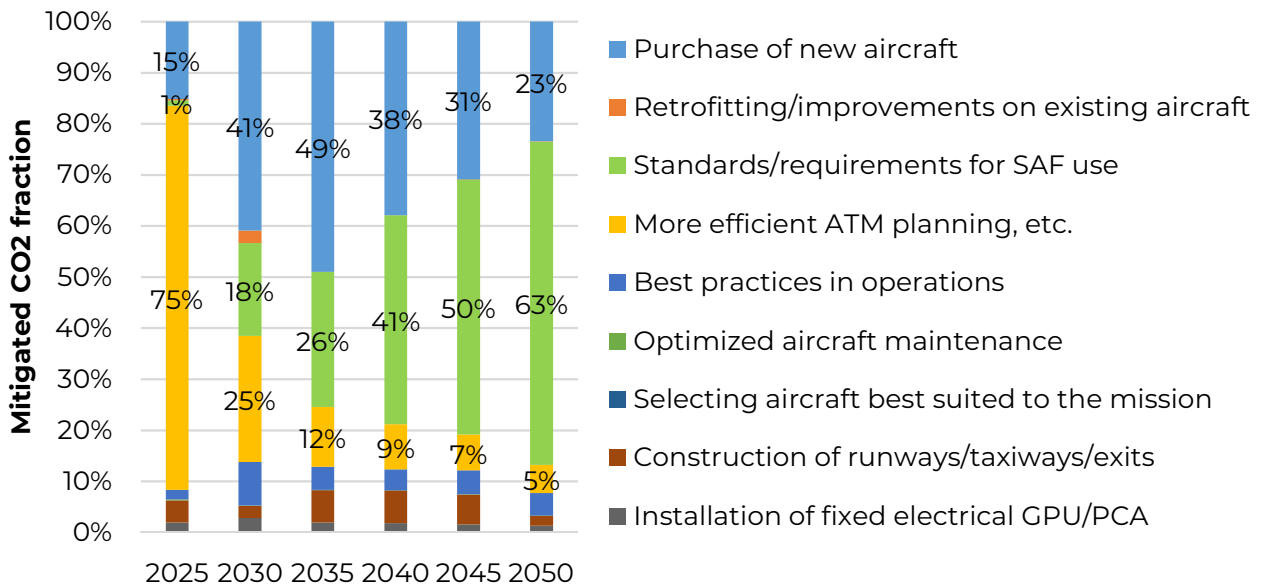


Figure 9.7. Impact of measures on CO₂ emissions mitigation (Italy-IPCC method)

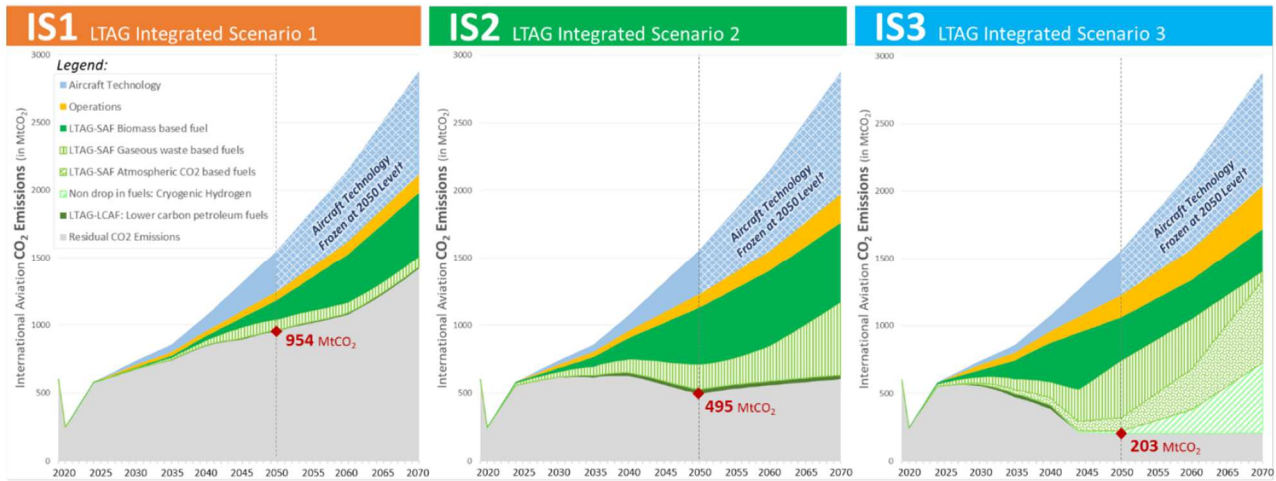
Regardless to the flights-State attribution method adopted, considering the data here presented and the absolute values of total mitigated CO₂ emissions reported in Table 9.3 and Table 9.4, it is possible to observe that the expectations in terms of most effective measures are:

- for the period 2025-2040: purchase of new aircraft or, generally speaking, improvements in aircraft technology;
- for the period 2040-2050: introduction of Alternative Aviation Fuels, which means SAF



according to EU regulation in the context of the present Action Plan.

This trend is in good agreement with the "Integrated Scenarios" elaborated in the "ICAO Report on the feasibility of a long-term global aspirational goal (LTAG) for international aviation CO₂ emission reductions" (Ref. [8]), here shown in Figure 9.8.



† Caution required with the interpretation of absolute CO₂ emissions levels after 2050 due to modelling assumptions e.g., frozen aircraft technology after 2050. Under these assumptions, CO₂ emissions are higher than in an alternative scenario (and modelling approach) where aircraft technology would continue to improve after 2050.

Figure 9.8. "Integrated Scenarios" (IS) elaborated in the ICAO LTAG Report (Ref. [183])



10 A ROADMAP FOR SUSTAINABLE AVIATION FUELS IN ITALY

According to the ICAO Guidance (Ref. [175]), the final section should provide a description of any specific needs for the implementation of selected future mitigation measures, if applicable.

As the previous chapter describes, the efforts put in place by private stakeholders have a significant role in the path toward the LTAG. This is more evident in the short-to-midterm, whereas in the long-term data show that the most significant results will come from the replacement of conventional fossil-based fuels with SAF.

With the introduction of the “RefuelEU Aviation” Regulation (Ref. [179]), EU has provided a strong push towards this direction and the expected results in terms of CO₂ emissions mitigation can be easily recognized in both the state-level analysis, presented in the previous chapter, as well as in Section 1 dedicated to “Measures taken collectively in Europe”.

For this reason, the conclusions drawn for the state-level analysis concern the action that Italy could take to facilitate the implementation of the “RefuelEU Aviation” Regulation and, generally speaking, to accelerate the scale-up of SAF market in the country.

These aspects have been the focus of the activities performed in 2023 for the definition of a national SAF roadmap, which focused on State-level policy as reported in the document “A roadmap for Sustainable Aviation Fuels in Italy. Enac path for the definition of SAF policy” (Ref. [180]). The present chapter of the Italian State Action Plan on CO₂ emissions reduction aims to highlight the most significant elements of the SAF roadmap, for further details the reader is invited to access the document referred above.

Starting from 2019, Enac has established a “National Observatory on SAF” with the aim of creating a technical board attended by institutions, such as the Ministry of Infrastructure and Transport (MIT) and the Ministry of Environment and Energy Security (MASE) and Italian stakeholders who have expressed interest in SAF. As summarised in Figure 10.1, this group consists of Italian and foreign aircraft operators, airport management bodies, operators in the fuel supply chain (producers, distributors, and handlers), aircraft manufacturers, research bodies and trade associations.

Since its creation, the National Observatory on SAF has organised several technical meetings to define the needs of Italian stakeholders and identify shared strategies at national level, especially in view of the introduction of the Regulation “RefuelEU Aviation”.

Through this initiative, Enac main objective is to provide institutional partners with a comprehensive framework that allows to elaborate the best policies to encourage the introduction of SAF in Italy, minimising the risk that increased costs could depress the demand for air transportation, resulting in a damage to the whole sector.

Starting from 2022, Enac, in synergy with MIT, MASE and the stakeholders participating in the National Observatory on SAF, has set the goal of defining a “Roadmap on SAF in Italy”, focusing on the study of possible incentive policies, with a consistent approach to the context defined by



the "RefuelEU Aviation" Regulation.

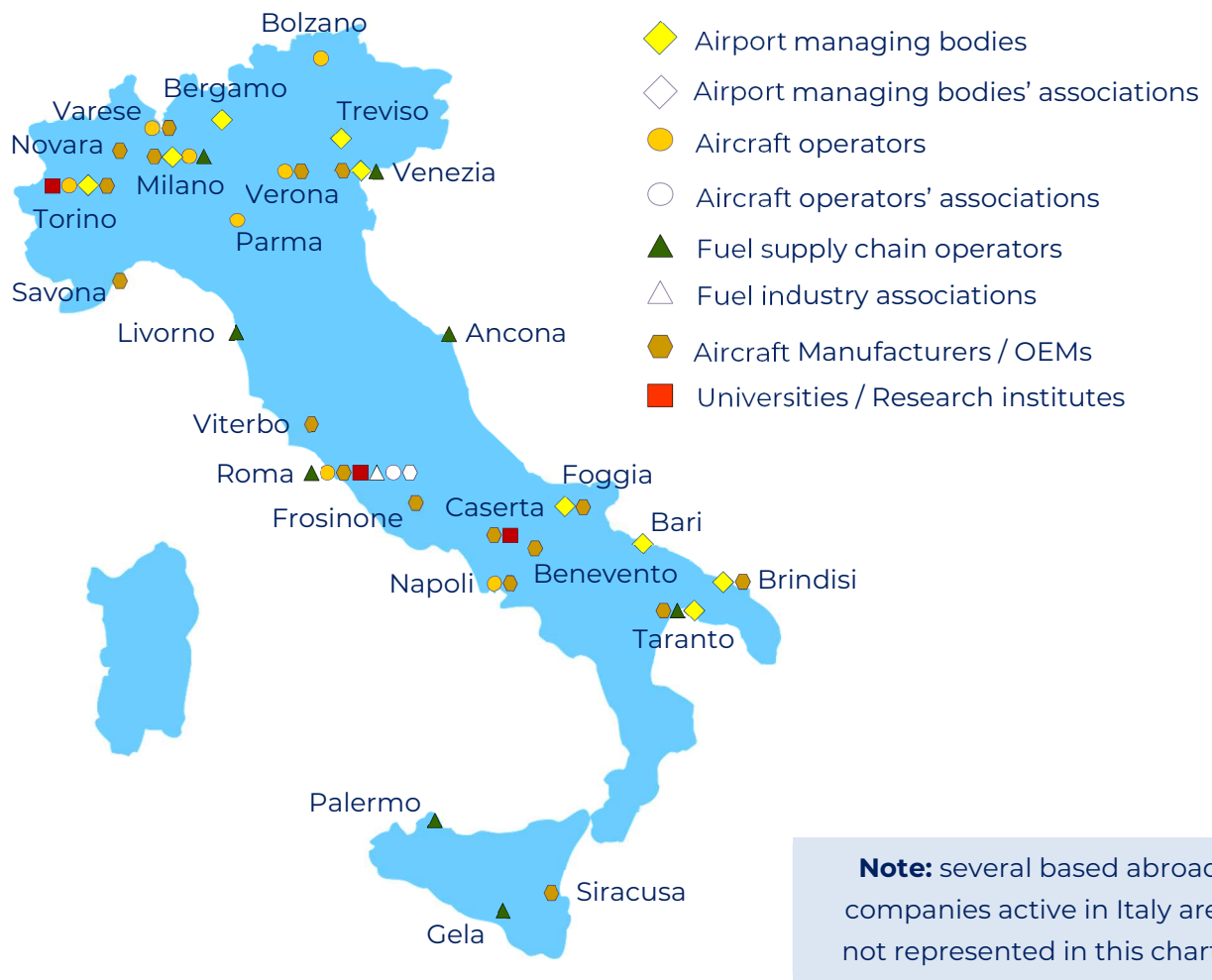


Figure 10.1. Map of stakeholders participating in the SAF policy survey

The process of definition of the aforementioned roadmap was conceived by placing at the centre an open and constant confrontation with stakeholders, using as starting points the collection and the analysis of their point of view. To this end, starting from February 2023, Enac has launched a stakeholder engagement phase through the distribution of a questionnaire designed in a way consistent with the guidelines produced by international reference bodies such as ECAC (European Civil Aviation Conference).

At the beginning of 2023, ECAC has indeed published, thanks to the contribution of Enac and the other Civil Aviation Authorities of each Member State, a guideline (Ref. [184]) for the definition of a SAF policy at national level, using examples of international validity such as those developed by ICAO or the World Economic Forum (Ref. [185]).

The classification of the policies introduced by the latter and then adopted by ECAC has been taken up in the Italian context and inserted in a process of adaptation and simplification, in order to present to stakeholders an adequate number of options, accompanying them with impact indicators to be used as metrics for the evaluation of each policy.



Policies were then divided into 3 macro-groups:

- 1. policies suitable for the Italian context, including those already implemented or planned;
- 2. policies not suitable for the Italian context, because outdated or in conflict with other existing measures;
- 3. policies not belonging to previous groups.

Group 1 policies, shown in Table 10.1, are considered useful to build a baseline package and it was not considered a priority to require an evaluation by stakeholders.

A/PO1	Establish dedicated innovation funds or financing options to support early-stage SAF production pathways at lower technology readiness levels
A/PO4	Eligibility of SAF for tax advantages and blending or production incentives
A/PO5	Bonds/Green bonds
A/PO9	Recognize SAF benefits under carbon taxation or cap-and-trade systems
B/PO12	Update existing policies to incorporate SAF
B/PO14	Levy a dedicated SAF fee on flights to finance SAF acquisition, with possible variation accounting for flight distance and SAF blending target levels
B/PO15	Introduce a domestic carbon price or cap-and-trade mechanism, potentially aviation-specific, to price-in the cost of GHG emissions for fossil fuel
C/PO20	Adopt clear and globally or regionally recognized sustainability standards for feedstock supply
C/PO21	Support SAF stakeholder initiatives
C/PO22	Support the roll-out of existing SAF production technologies and international capacity building to developing countries to promote the adoption of SAF production globally

Table 10.1. Policy baseline from the ECAC guidance on SAF policy

Group 2 policies, not listed here for the sake of brevity, were excluded from the questionnaire, while Group 3 policies were included as being in line with the following criteria:

- sufficiently different from baseline policies;
- adaptable to the Italian context;
- able to stimulate different views among stakeholders;
- not implemented in Italy yet.

The policies of the latter group were subjected to a process of adaptation and simplification that led to reduce the number to 10. As shows in detail in Table 10.2, the policies cover various areas through the proposal of interventions aimed at attracting investment on SAF, creating new production plants, or expanding existing ones, introducing tax reductions for those who produce or use SAF, and facilitate the entry of feedstocks and the distribution of SAF on the territory.



P# Policy description

P1	Attract investments on the production of SAF in Italy, guaranteeing to the investors that the Italian government will pay the difference of market price between SAF and conventional fuels (e.g.: using financial instruments like the contracts for difference) and recognising greater subsidies for SAF with lower carbon intensity
P2	Attract investments aimed at starting or increasing the production of SAF in Italy, by providing investors with capital grants and loans at reduced rates, with guarantee from the Italian State
P3	Increase the share of feedstocks and intermediate products destined for the production of SAF with indirect measures , based on incentives that push competing sectors towards decarbonisation solutions of different types (e.g.: electricity from renewable sources for road transport)
P4	Provide specific tax incentives for SAF producers with production facilities located in Italy (including blenders), establishing a proportionality to the cost differential between SAF and conventional jet-fuel (Note: a higher cost may be related to a lower carbon intensity)
P5	Provide specific tax incentives for producers of feedstocks or intermediate products for the production of SAF with facilities located in Italy, establishing a proportionality to the cost differential between SAF and conventional jet-fuel (Note: a higher cost may be related to a lower carbon intensity)
P6	Provide specific tax incentives for users of SAF produced in Italy , establishing a proportionality to the cost differential between SAF and conventional jet-fuel (Note: a higher cost may be related to a lower carbon intensity)
P7	For both producers and users of SAF produced in Italy, assign additional tax incentives that reward the lower carbon intensity of SAF, taking the benefits related to both lower CO ₂ and non-CO ₂ emissions (e.g.: air quality, contrails, NO _x , etc.) into account
P8	Guarantee the commitment of the Italian government towards the use of SAF through political declarations indicating ambitious objectives (e.g.: minimum SAF shares higher than the European targets)
P9	Establish a transfer system of purchase certificates of SAF produced in Italy (e.g.: national level book and claim), favouring the growth of the market of the SAF in the Italian airports
P10	Reduce import barriers for feedstocks and intermediate products intended for SAF production in Italy (e.g.: reduce the current restrictions on imports of agricultural, plant, chemical and waste products if they are intended for the production of SAF)

Table 10.2. SAF policy included in the questionnaire for the stakeholders

A similar process has been adopted to define the impact indicators that can represent the expectations regarding SAF production capacity, the economic impact on passengers, competitiveness among operators, energy independence, boost of research and public acceptance. As summarised in Table 10.3, these indicators have been included in the survey in the



form of questions, expressing, for each of the 10 policies, a value from 1 to 5 on a quality scale of increasing impact.

Q# “At the Italian level, what kind of impact may have the evaluated policy on...

Q1	...the increase in the share of feedstocks or intermediate products destined for the production of SAF?”
Q2	...the increase of the total production capacity of SAF?”
Q3	...the expansion of existing SAF production facilities and the creation of new ones?”
Q4	...the choice of feedstocks and production pathways with lower carbon intensities ?”
Q5	...the mitigation of the increase of SAF cost compared to conventional fuels?”
Q6	...the mitigation of the increase of the ticket cost for the passenger?”
Q7	...the initiation or expansion of SAF research and development activities?”
Q8	...reducing the dependence of the Country on energy imports?”
Q9	...the guarantee of a level playing field among competitors (producers, distributors, users, etc.)?”
Q10	...citizens' awareness of the efforts undertaken by the aviation sector towards environmental sustainability objectives?”

Table 10.3. Questionnaire regarding impact indicators for policies assessment

The questionnaire was sent to the participants of the above-mentioned technical board and requests for expressions of interest were published via Enac website and social channels, in order to extend the invitation to all organisations potentially interested.

During the data collection period, out of 60 organisations contacted, 48 replied to the questionnaire, including 7 airport managing bodies, representing an overall view of about 70% of national air traffic in terms of number of passengers, 19 air carries operating in Italy, the main companies of the fuel production-distribution-handling industry, the major aircraft manufacturers operating in Italy, as well as research institutions and universities.

The data collected have highlighted many common aspects among the views expressed by the different stakeholder groups, summarised as follows:

- the approval of the policies has been driven mainly by the following expectations:
 - increase in the share of feedstocks or intermediate products destined for the production of SAF;
 - increase in the total production capacity of SAF;
 - expansion of existing SAF production facilities or creation of new ones;



- among the policies, the most appreciated is the one concerning the introduction of tax incentives for the use of SAF produced in Italy by aircraft operators (policy 6);
- many stakeholders would like to see additional incentive measures such as additional tax relief for producers of SAF (policy 4) and feedstocks (policy 5), tax-related rewards for those who choose to produce or use SAF less polluting than others (policy 7) and incentives to attract investments in the production chain (policy 1, in particular);
- a further fact that unites the vision of the subjects interviewed is the scepticism towards any more ambitious national policies than those set at European level by the "RefuelEU Aviation" (policy 8).

The "policy table" illustrated in Figure 10.2 provides a simplified graphic representation of the above.

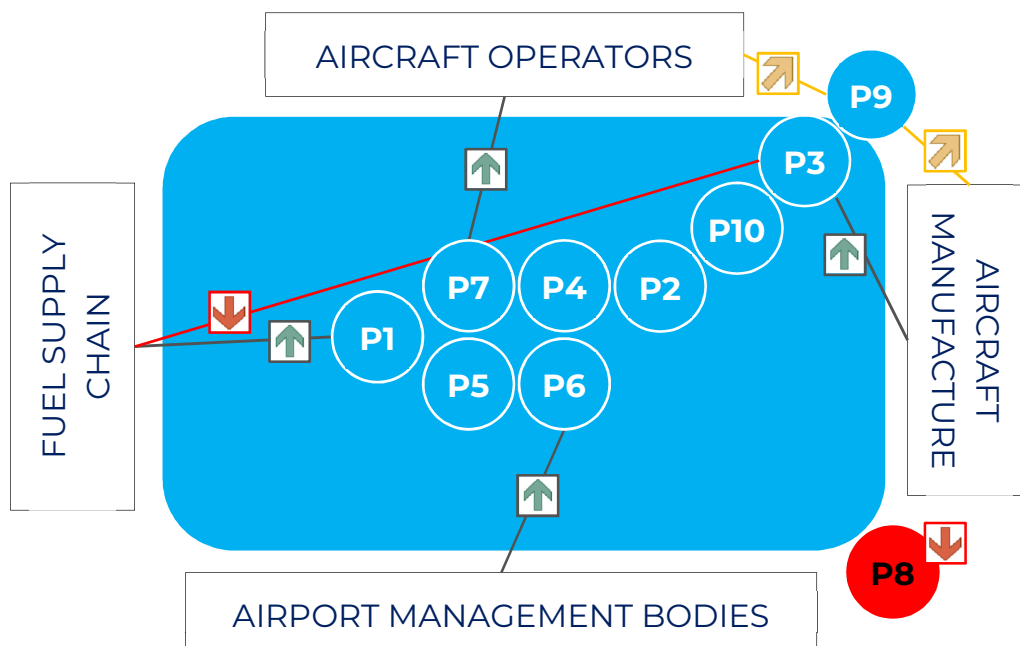


Figure 10.2. "Policy table": qualitative representation of the proximity between policy and stakeholders' vision

In addition, collected data show that policy 3, which involves measures to encourage other transport sectors towards non-competing forms of decarbonisation (such as electricity), and policy 9, concerning a certificate transfer system (e.g., book & claim), were found to be partially effective by the operators of the fuel supply chain and airport managing bodies, respectively.

Regarding policy 3, the scepticism arises from the fact that, for market reasons, fuel production in refineries cannot be compartmentalized according to different transport sectors.

For policy 9, there is concern that a book & claim-like system, which removes the constraint for aircraft operators to uplift SAF at all airports, may slow the distribution of SAF across the national territory. It should be noted that the European Commission will evaluate a certificate transfer system to be included in the flexibility mechanism provided by the RefuelEU Aviation Regulation,



- balance the obligations to use SAF with an appropriate incentive plan;
- encourage the use of SAF at domestic airports, making their cost competitive with conventional fuels;
- promote the development of distribution logistics and establish blending stations at airports;
- implement a globally recognized certificate exchange system similar to book & claim.
- airport managing bodies:
 - establish a priority framework for the provision of SAF at Italian airports with fair and non-discriminatory criteria, considering the objectives of the Italian Airport System Masterplan;
 - revise the airport charges to reward aircraft operators using SAF, utilizing appropriately integrated program contracts;
 - adapt distribution and storage infrastructures to ensure an increasing supply capacity for SAF over time;
 - systematically monitor the evolution of SAF prices and production as well as SAF supply capacity;
 - share best practices and implementation models (e.g., for the RefuelEU Aviation Regulation), promoting initiatives to enhance collaboration within the aviation ecosystem.
- fuel supply chain operators:
 - create a regulatory framework that is harmonized with the international context and stable over time, encompassing regulatory, industrial, and technological dimensions;
 - balance supply and demand by aligning obligations with incentive mechanisms;
 - ensure a wide availability of feedstocks and a clear, stable framework to support ongoing and future investments;
 - develop refining and co-processing facilities extensively or convert conventional refineries into biorefineries, harmonizing SAF production with other renewable components used mainly in road transport;
 - ensure structural flexibility for operators through mechanisms similar to Book & Claim;
 - foster synergies between initiatives for producing sustainable aviation fuels and those for other types of mobility (e.g. land and sea), stimulating the development of integrated energy hubs;
 - support research and development activities related to synthetic SAF and alternative propulsion systems in the medium to long term.



- aircraft manufacturers:
 - introduce measures to support all actors in the value chain, particularly to bridge the current price gap between SAF and kerosene;
 - establish a clear and stable specification of eligible feedstocks for SAF production at the European level;
 - support the development of the EU Clearing House to coordinate and finance certification initiatives for new SAF and the production qualification of approved SAF;
 - support the global development of processes and standards for qualifying aeronautical materials compatible with various types of SAF;
 - develop global approaches and acceptable means of compliance for qualifying aircraft and their systems and components using different types of SAF;
 - focus research and development on SAF types that significantly reduce environmental impact and on alternative propulsion modes.
- universities and research centres:
 - consider tax incentives for SAF as an investment to reduce healthcare expenditure;
 - explore the willingness of passengers, or shipping agents in the case of goods, to pay a surcharge for flying with SAF;
 - continue the research on the correlation between SAF and the reduction of non-CO₂ emissions (nitrogen oxides, sulphur, particulates, contrails, etc.);
 - focus primarily on market regulation, taking the complexity of fuel cross-sectors into account, to determine a balance point that allows for the growth of supply and demand;
 - open a debate in Europe on tax incentives, State aid regulations, and the budgetary flexibility of Member States;
 - develop accurate communication strategies with citizens by the Government and involved stakeholders.

Taking these comments into account to combine the selected policies with those from the "baseline" group in Table 10.1, it is possible to construct a regulatory framework similar to that presented in the analysis presented by the World Economic Forum (Ref. [185]). This framework, represented here in Figure 10.4, has as general objective the definition of “Balanced regulatory framework for SAF scaling-up in Italy”, to be achieved through a set of specific objectives (SO) which concern: 1) Demand-supply matching measures; 2) Supply-side measures; 3) Demand-side measures; 4) Measures for feedstock security.

In a second phase of the study, the selected policies have been restructured to determine a set of possible lines of action and measures for the implementation. A research carried out in collaboration with the Department of Political Science of the Università degli Studi Roma Tre (see Ref. [186] and Ref. [187]), has led to the definition of a 3-years long implementation plan here



summarized graphically in Figure 10.5.



Figure 10.4. Specific Objectives (SO) of the regulatory framework for SAF scaling-up in Italy



SAF ROADMAP: A BALANCED REGULATORY FRAMEWORK FOR SAF SCALING-UP IN ITALY

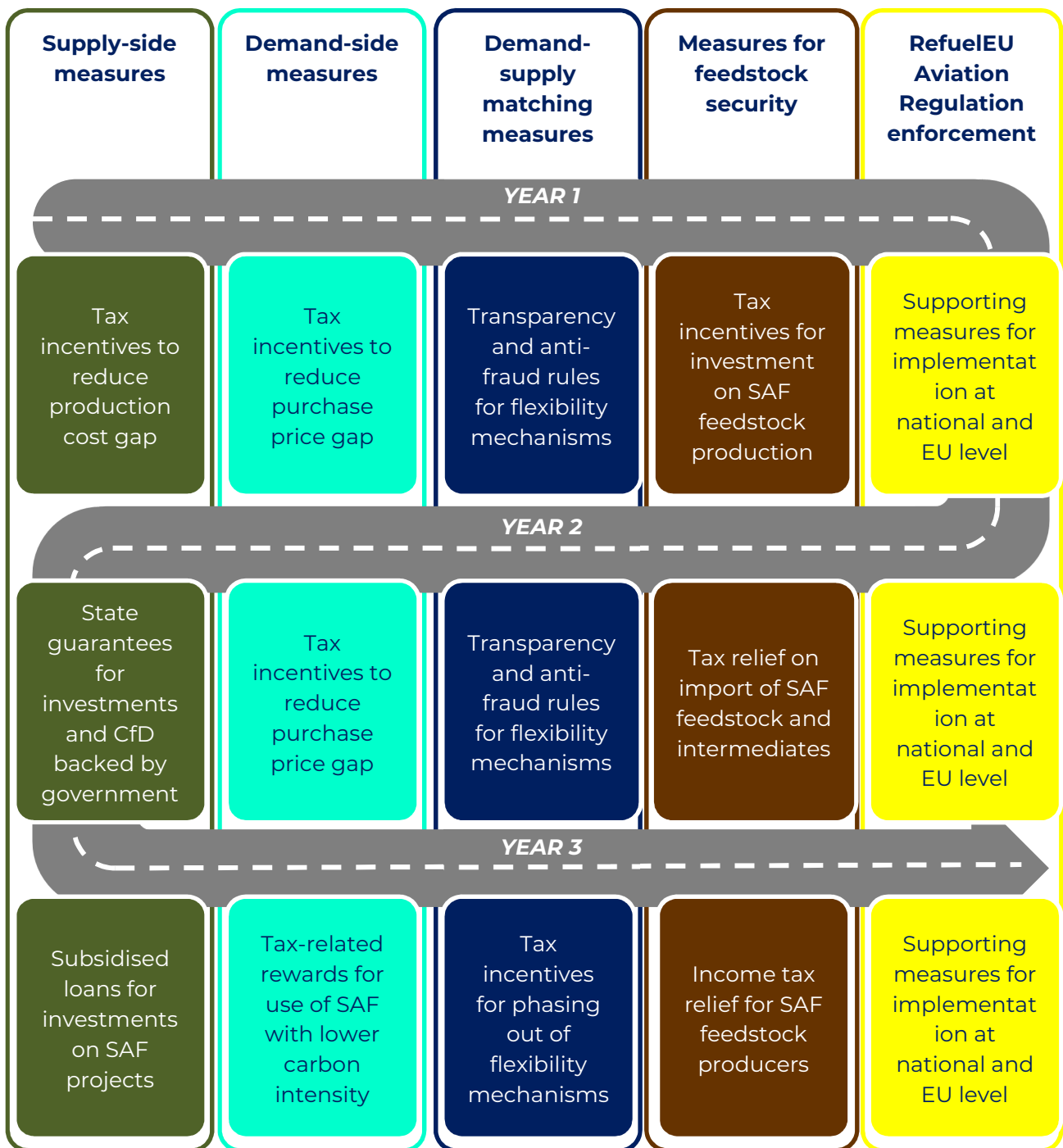


Figure 10.5. Italian SAF Roadmap: graphic summary of the implementation plan

As the graphic summary shows, a fifth specific objective called “RefuelEU Aviation Regulation enforcement” has been included to ensure the harmonization between the State-level regulatory framework and the EU set of regulations and directives concerning the environmental sustainability of air transport.

In conclusion, it is important to highlight several key elements of the national context, which



are significant at the time of drafting this document and useful for understanding the potential impact of the proposed roadmap on the development of SAF.

In line with the Authority's vision expressed throughout this document, these elements should be seen as integral parts of a general strategy based on certain guidelines necessary for addressing the challenge of decarbonizing air transport in the short term:

- prioritize more mature propulsion technologies, with aeronautical engines powered by SAF preferred over those still under research, such as hydrogen or electric propulsion;
- in the selection and research of feedstocks for SAF production, give preference to biomass over organic feedstocks from waste or residues and feedstocks of non-biological origin;
- activate international supply chains that enable developing countries to play an active role in production and not only in feedstock supply.

These elements result from complex, interconnected business processes characterized by higher risk levels than typical operations. The push towards SAF transition is evident among all the involved parties, driven not only by upcoming obligations from the RefuelEU Aviation Regulation but also by the market opportunities that SAF offer in terms of positioning within the circular and sustainable economy.

While there is a clear drive towards innovation promising net-zero emissions, the associated risks mean companies proceed cautiously. The feedback from stakeholders highlights the need to balance obligations with support measures that reduce the risks associated with the SAF transition within a stable regulatory framework.

The roadmap elaborated by Enac aims to capture these signals and to provide a comprehensible shape to the stakeholders' feedback, aiming to relate them to each other and to develop an implementation plan that aligns with the expectations of the majority. Several times and in various contexts, it has been emphasized that the primary priority is to promote SAF production, encouraging economies of scale to reduce the current cost differential between SAF and traditional fuels. This study indicates that, to foster SAF development in Italy, this priority should be coupled with other key priorities, such as stimulating demand, linking supply and demand, and ensuring the feedstock availability.

The decision to structure the roadmap over a three-year period was driven by the need to achieve impacts by 2030, a critical date for supply targets set by the RefuelEU Aviation Regulation. While the duration can be modified, and different choices can be made about when to start specific measures, it is crucial to preserve the implementation order to maintain alignment with the expressed priorities.

Beyond considerations on potential policies, it is important to underline once again that the main obstacles to SAF introduction are the low availability of finished products in the market and the difficulty of sourcing feedstock. The dialogue with stakeholders has highlighted the urgent need to address these obstacles through a holistic approach that does not impose disproportionate limitations on potential feedstock and transformation processes. Specifically, the strategy to bridge the short-term SAF production gap should focus on technologically and



commercially mature solutions such as biofuels, derived from waste substances, residues, or biomass produced through dedicated crops. These must comply with the non-competition criteria with food and feed crops, as prescribed by the Renewable Energy Directive, and should be obtained from intermediate crops or degraded land unsuitable for agriculture. This strategy would benefit the sector by increasing the availability of sustainable fuels and activating international supply chains, enabling developing countries to play a vital role in the production chain and benefit from the value generated through direct participation in the transition to net-zero emissions aviation.

Many of these countries have also a central role in ICAO's capacity-building programs, such as ACT-SAF (Ref. [188]), which are supported by around 90 Member States, including Italy, and funded by both the Member States and the European Commission. Implementing these activities would include countries with feedstock but lacking necessary technologies to activate and industrial growth, enabling them to join the production chain and contribute to the challenge of aviation emissions reduction

The content of this action plan was finalised in December 2024 and shall be considered as subject to update after that date

Enac thanks the organizations and people that have contributed to this study by their participation in the activities of the National Observatory on SAF and in the data collection for the update of the State Action Plan on CO₂ emissions reduction.



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APPENDIX TO NATIONAL SECTION

A) BASKET OF MEASURES

1. Purchase of new aircraft	The replacement of older aircraft with more modern aircraft is an important measure that can reduce fuel consumption and CO ₂ emissions. Stakeholders must consider the strategic and operational fit of the aircraft replacement, and this requires careful planning.
2. Improve fuel efficiency through development or modification	Two types of approaches can be distinguished: (1) modification or upgrade of existing technologies, which typically focuses on engine or other components upgrades (e.g. installation of wingtip fences); (2) the complete replacement of components, from modification of aerodynamic fairings, to the use of wireless or optical power/signal transmission, or even the replacement of incandescent bulbs with LEDs.
3. Replacement of engines	Along with the aircraft structure and aerodynamics, the aircraft engine is one of the most important elements influencing fuel consumption, and thus CO ₂ emissions. Advances in fuel efficiency are therefore a crucial aspect of engine development and are usually conducted in close connection with the development of new airframes.
4. Aviation alternative fuels	Alternative aviation fuels are drop-in fuels, i.e. certifiable according to current jet fuel standards, obtained from sources other than oil, such as biomass and hydrogenated fats and oils. The so-called SAF (Sustainable Aviation Fuels), as defined by Regulation (EU) 2023/2405 "ReFuelEU Aviation" or CEF (CORSIA Eligible Fuels), in the ICAO context, are some examples. These fuels are produced in a more sustainable way than fossil-based jet fuel, thanks to the reduction of emissions of the main greenhouse gases (such as CO ₂ , CH ₄ and N ₂ O) over their entire life cycle. For safety reasons related to the older generation jet engines still in use, SAF cannot be used at 100% today, but must be mixed with conventional kerosene.



5. Measures to improve pre-departure and arrival planning	<p>Arrival Manager (AMAN) is an Air Traffic Control (ATC) support system, that provides automated sequencing support by continuously calculating arrival sequences and flight times. CO₂ emission savings result largely from in-flight fuel savings enabled by early speed reduction and reduced arrival delays during airport peak hours. Departure Manager (DMAN) is a planning tool developed to improve departure flows at airports and increase predictability. DMAN calculates the Target Take-off Time (TTOT) and the Target Start-up Approval Time (TSAT), taking into account multiple constraints and preferences. As a result, the DMAN provides a planned departure flow with the goal to maintain an optimal throughput at the runway, reduce queuing at holding point and distribute the information to various stakeholders at the airport. CO₂ emission savings mainly result from shorter taxi times during peak hours, resulting in fuel savings.</p>
6. Measures to improve collaborative decision making	<p>Airport Collaborative Decision Making (A-CDM) aims to improve air traffic flow and capacity management at airports by reducing delays, improving the predictability of events and optimising the utilization of resources. Implementation of A-CDM allows each partner to optimize their decisions in collaboration with other A-CDM partners, knowing preferences and constraints, and the actual and predicted situation. The decision-making process by the A-CDM partners is facilitated by the sharing of accurate and timely information and by adapted procedures, mechanisms and tools.</p>
7. Measure to Improve Air Traffic Management in non-radar airspace	<p>The main strategy in this area is based on the use of Automatic Dependent Surveillance-Broadcast (ADS-B) in ATM for the transmission by an aircraft of information including its position, altitude, speed and identification. In this way, ATC radar equivalent services can be expanded into areas where radar services are currently not available for geographical or cost reasons. Compared to conventional radars, Cooperative Dependent Surveillance infrastructure allows cost savings by contributing to the efficiency of ground operations.</p>
8. Increase fuel efficiency of departure and approach procedures	<p>The main strategy in this area is based on Area Navigation (RNAV), and more generally on Performance Based Navigation (PBN), which - based on the determination of the aircraft position through GNSS and inertial systems - allows to fly with greater flexibility in terms of flight path than prescribed by traditional Instrument Flight Rules (IFR). PBN routes and procedures allow greater flexibility in departure and arrival path, with consequent saving of miles, precise adherence to the ideal flight route and reduced minimum altitudes during approach.</p>



9. Introduce continuous climb and descent procedures	<p>Aircraft operate most efficiently at their respective optimum cruising altitude, which depends on aircraft type, weight, wind and other meteorological conditions. A rapid climb after take-off to reach the optimum altitude saves fuel. Similarly, remaining at cruising altitude as long as possible before starting a descent reduces fuel consumption and CO₂ emissions. Continuous Climb Operations (CCO) and Continuous Decent Operations (CDO) allow arriving or departing aircraft to descend or climb continuously, to the maximum extent possible</p>
10. Improve aircraft guidance on apron	<p>The main strategy in this area is based on the Advanced Surface Movement Guidance & Control System (A-SMGCS), a tool that provides routing, guidance and surveillance for the control of aircraft and vehicles in order to maintain sufficient surface movement under all weather conditions. The A-SMGCS is modular and consists of several functionalities to support safe, orderly and rapid movement of aircraft and vehicles. A-SMGCS also includes complementary procedures and, at lower levels of implementation, aims to provide improved situational awareness of controllers. The system supports airport controllers in reducing taxi time on the apron and taxiways, leading to fuel and CO₂ emission savings.</p>
11. Measures to improve taxiing	<p>Currently, there are two strategies to reduce fuel consumption associated with taxiing: Engine-Out, which involves the use of a reduced number of engines compared to those available, and E-Taxi, which involves the use of electric motors installed on one or more of the landing gears instead of the aircraft engines (generally applicable only to narrow-body aircraft).</p>
12. Minimizing weight	<p>As aircraft fuel consumption increases with aircraft weight, any measure that aims to reduce even slightly the weight of any component or object on board produces potential fuel savings. In addition to lightening interventions on primary components such as structures and systems, those aimed at the passenger cabin (e.g. seats, carpeting, magazines, beverage trolleys, etc.) or the cockpit (for example, digital on-board documentation instead of paper) are also useful for this purpose.</p>

13. Minimizing flaps	<p>Flap reduction during take-off and landing reduces aerodynamic drag and required engine power, resulting in decreased fuel consumption and CO₂ emissions. Other potential benefits come from the general increase in speeds during flight at lower altitudes (including climb), with consequent reduction in fuel consumption and CO₂ emissions. Such potential benefits must be weighed taking into account that some airlines optimize flap settings at take-off to achieve maximum engine thrust reduction (flex/derated power), in order to increase their operational life. Furthermore, higher approach and landing speeds may lead to increased maintenance costs for landing gears, mechanical and aerodynamic brakes, thrust reversers, etc.</p>
14. Minimizing reversers use	<p>Minimizing thrust reversers use after landing allows to reduce fuel consumption, and therefore gaseous and acoustic emissions. In order to achieve this aim, a strategy typically adopted is to use reversers at idle.</p>
15. Reduced speed	<p>A Reduced flight speed can lead to lower fuel consumption, and therefore lower emissions. However, in order to minimize costs, airlines need also to consider the costs related to the increased flight duration (increased engine operating hours, additional labour costs, lower aircraft utilization in terms of cycles per year, etc.). In modern aircraft, the Flight Management Computer System allows to optimize not only the cruise speed, but the entire flight profile, minimizing the so-called cost index (CI), which represents the ratio between hourly operating cost and specific fuel cost.</p>
16. Maintenance: engine washing and zonal drying	<p>In the maintenance sector, there are processes capable of reducing fuel consumption and CO₂ emissions, including: engine washing, which is carried out with deionised, heated and atomized water in order to prevent the degradation of propulsive performance caused by the accumulation of contaminants such as sand, insects or dust; and zonal drying, which consists in the removal of moisture from the aircraft cabin using special devices installed on board, in order to prevent the increase in weight due to condensate water accumulation and reduce the risk of corrosion and other failures also due to moisture</p>
17. Selecting aircraft best suited to the mission	<p>CO₂ savings can be achieved by managing the fleet and rationalizing aircraft operations on the basis of the required use. Many airline operators use software tools that enable them to optimize aircraft assignment and rotation.</p>

18. Installation of fixed electrical ground power and pre-conditioned air to allow aircraft Auxiliary Power Unit switch-off	<p>The amount of fuel required to power the APU (e.g. to provide electrical, pneumatic or hydraulic power to the aircraft with the engines off or to start the engines) can be significantly reduced if the airport is equipped with Ground Power Unit (GPU) for electrical power and with Pre-Conditioned Air (PCA) for air conditioning. The environmental benefit is greater the lower the carbon footprint of the energy mix available at the airport.</p>
19. Use cleaner alternative sources of power generation	<p>As in the previous case, the energy mix available at the airport is the basis for a potential CO₂ saving. In fact, airports themselves can be the place where renewable energy is produced, thus contributing to reduce the carbon footprint of the energy mix.</p>
20. Construction of additional taxiways	<p>A taxiway system designed to minimize taxi times can potentially reduce taxi fuel consumption as well as being helpful in reducing possible congestion problems. Furthermore, additional taxiways could allow departing aircraft to enter the runway from an intersection closer to the aircraft parking position, with advantages especially for smaller aircraft (such as turboprop/regional and narrow-body aircraft) which do not require the entire runway to take off. Similarly, arriving aircraft can exit the runway earlier, thus reducing taxi-in fuel consumption and in principle increasing runway capacity.</p>

B) RULES OF THUMB

TECHNOLOGY AND STANDARDS

Sub-category	Measure	Rule of thumb	Notes
Purchase of new aircraft	Replacement of old aircraft with new ones	FS = [0.9% to 1.05%] * A * N * HFC * OH	FS = annual Fuel Savings [tons] [...] = typical value of the multiplier A = age of the aircraft to be replaced [years] N = number of aircraft to be replaced HFC = average fuel consumption per hour of the aircraft to be replaced [tons/h] OH = annual average operating hours of the aircraft to be replaced [h]
Retrofitting and upgrade improvements on existing aircraft	Improve fuel efficiency through development of modification: Wingtip fence	FS = [1% to 3%] * N * HFC * OH	As above with: N, HFC and OH referred to the modified aircraft
	Improve fuel efficiency through development of modification: Blended winglet/sharklets	FS = [3% to 6%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: Raked wingtip	FS = [3% to 6%] * N * HFC * OH	



Sub-category	Measure	Rule of thumb	Notes
	Improve fuel efficiency through development of modification: Split winglets with scimitar tips	FS = [2% to 6%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: Drag reduction coatings	FS = [1%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: Turbulent flow drag coatings (riblets)	FS = [1%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: Aircraft graphic films	FS = [1%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: High power LEDs for cabin lighting	FS = [0.5%] * N * HFC * OH	
	Improve fuel efficiency through development of modification: Wireless/optical connections for in-flight entertainment	FS = [0.5%] * N * HFC * OH	



SUSTAINABLE AVIATION FUELS (SAF) AND LOWER CARBON AVIATION FUELS (LCAF)

Sub-category	Measure	Rule of thumb	Notes
Standards/requirements for SAF use	Life-Cycle-Emissions-equivalent amount of conventional jet fuel savings	Equivalent FS = $\Sigma M \cdot (1-L/89)$	<p>FS = annual Fuel Savings [tons] M = annual SAF/LCAF consumption [tons] L= life cycle emissions of SAF or LCAF [gCO₂e/MJ] (according to the ICAO document "CORSIA default life cycle emissions values for CORSIA eligible fuels")</p> <p><i>Example:</i> Assuming 1000 tons of SAF with L=30 gCO₂e/MJ and 5000 tons of LCAF with 74 gCO₂e/MJ, it follows: Equivalent FS = 1000*(1-30/89) + 5000*(1-74/89)= 1506 tons</p>

OPERATIONAL IMPROVEMENTS

Sub-category	Measure	Rule of thumb	Notes
More efficient ATM planning, ground operations, terminal operations, en-route operations, airspace design and usage, aircraft air navigation capabilities	Measures to improve fuel-efficient departure and approach procedures: CDO (Continuous descent operations)	Use IFSET or FS = [0.06 tons] * Nops	FS = annual Fuel Savings [tons] [...] = typical value of the multiplier Nops = annual number of CDOs
	Measures to improve fuel-efficient departure and approach procedures: PBN STAR (Performance-Based navigation Standard Instrument arrival)	Use IFSET or FS = [0.02 to 0.05 tons] * Nops	As above with: Nops = annual number of arrivals on PBN STAR
	Measures to improve fuel-efficient departure and approach procedures: CCO (Continuous Climb Operations)	Use IFSET or FS = [0.09-0.15 tons] * Nops	As above with: Nops = annual number of CCOs



Sub-category	Measure	Rule of thumb	Notes
	Measures to improve fuel-efficient departure and approach procedures: PBN SID (Performance-Based navigation Standard Instrument departure)	Use IFSET or FS = [0 to 0.03 tons] * Nops	As above with: Nops = number of annual departure movements on PBN SID
	Measures to improve fuel-efficient departure and approach procedures: A-CDM (non-U.S. version) (Airport Collaborative Decision Making)	Use IFSET or FS = [1 to 3 min] * FCtaxi * Nmov	[...] = typical value of the time saved, in minutes, in total (taxi-in + taxi-out). NOT valid for U.S. version of A-CDM Nmov = number of movements (departures + arrivals) FCtaxi = average fuel consumption per minute during taxi. Typical values: narrow-body aircraft = 0.012 tons/min; 2-engines wide-body aircraft = 0.033 tons/min; 4-engines wide-body aircraft = 0.054 tons/min
	Measures to improve fuel-efficient departure and approach procedures: A-CDM (U.S. version) (Airport Collaborative Decision Making)	Use IFSET or FS = [1 to 2 min] * FCtaxi * Ndep	[...] = typical value of the time saved, in minutes, in taxi-out phase. Valid for U.S. version of A-CDM Ndep = number of departures



Sub-category	Measure	Rule of thumb	Notes
	Measures to improve fuel-efficient departure and approach procedures: WAKE-RECAT (departures) (Wake Vortex Recategorisation)	Use IFSET or FS = [21-32 sec]/60 * FCtaxi * Ndep * RECAT%	[...] = typical value of the taxi-out time saved, in seconds, by using RECAT Ndep = number of annual departures RECAT% = fraction of number of annual departures with RECAT
	Measures to improve fuel-efficient departure and approach procedures: WAKE-RECAT (arrivals) (Wake Vortex Recategorisation)	Use IFSET or FS = [35-60 sec]/60 * FCtaxi * Narr * RECAT%	[...] = typical value of the taxi-in time saved, in seconds, by using RECAT Narr = number of annual arrivals RECAT% = fraction of number of annual arrivals with RECAT
	Measures to improve fuel-efficient departure and approach procedures: AMAN/(RSEQ) (Arrival manager - Runway sequencing)	Use IFSET or FS = [0.05 -0.1 tons] * Narr * AMAN%	[...] = typical value of the fuel saving, in tons, by using AMAN/RSEQ Narr = number of annual arrivals AMAN% = fraction of number of annual arrivals with AMAN/RSEQ



Sub-category	Measure	Rule of thumb	Notes
	Measures to fully utilize ADS-B surveillance (Automatic Dependent Surveillance)	Use IFSET or $FS = [1 \text{ to } 2\%] * NFU * ER * FTU * HFC * NC$	[...] = typical value of the fuel saving, in %, for each 1,000 feet of altitude toward the optimal en-route altitude NFU = annual number of aircraft in un surveilled airspace ER = ADS-B equipage rate of the aircraft in un surveilled airspace (e.g.: 70%) FTU = average time in un surveilled airspace per flight [hours] NC = number of 1,000 feet climbs to optimal altitude per flight (typically 1 or 2)
	Implementation of radius to fix PBN procedures	Use IFSET or $FS = PBN\% * \Sigma (N_{mov} * FS_{mov})$	PBN% = fraction of movements on which the improved procedure is implemented (annual average) N _{mov} = annual number of movements (arrivals + departures) FS _{mov} = fuel saving per movement. Typical values: small aircraft = 11 - 40 kg; medium aircraft = 62 - 121 kg; heavy aircraft = 95 - 187 kg



Sub-category	Measure	Rule of thumb	Notes
	Implementation of RNP AR APCH procedures for reducing approach minima and the possibilities of missed approach/diversion (Required Navigation Performance Authorization Required Approach)	Use IFSET or $FS = APCH\% * Narr * FSarr$	APCH% = fraction of avoided missed approaches or diversions for RNP AR APCH procedures, over the annual arrivals Narr = annual number of arrivals FSarr = average extra fuel burned in case of missing approach or diversion. Typical values: 381-470 kg.
	Implementation of A-SMGCS surface operations (SURF) during peak periods (Advanced Surface Movement Guidance and Control System)	Use IFSET or $FS = [1-2 \text{ min}] * FC_{taxi} * N_{dep} * A-SMGCS\%$	[...] = taxi-out time reduction from A-SMGCS in peak hours. Typical value: 3.5% FC _{taxi} = average fuel consumption per minute during taxi. Typical values: narrow-body aircraft = 0.012 tons/min; 2-engines wide-body aircraft = 0.033 tons/min; 4-engines wide-body aircraft = 0.054 tons/min N _{dep} = number of annual departures A-SMGCS% = fraction of departures on A-SMGCS
	Implementation of A-SMGCS surface operations (SURF) during periods of low visibility (Advanced Surface Movement Guidance and Control System)	Use IFSET or $FS = [1-2 \text{ min}] * FC_{taxi} * N_{dep} * A-SMGCS\%$	As above, with: [...]: taxi-out time reduction from A-SMGCS during low visibility procedures. Typical value: 0.4%



Sub-category	Measure	Rule of thumb	Notes
	Implementation of A-SMGCS (SURF) during night operations (Advanced Surface Movement Guidance and Control System)	Use IFSET or FS = [23-64 sec]/60 * FC_{taxi} * N_{dep} * A-SMGCS%	As above, with: [...]: taxi-out time reduction from A-SMGCS during night operations. Typical value: 10%
Best practices in operations	Minimizing weight – TP (Turboprop)	FS = K * N * WR * OH	FS = annual Fuel Savings [tons] K = fuel saving factor per tons-hour. Typical values: 1.95% for turboprop and small jet aircraft; 3.35% for narrow-body aircraft; 3.87% for wide-body aircraft N = number of aircraft whose weight has been reduced WR = average weight reduction [tons] OH = annual average operating hours of the aircraft [h]
	Minimizing flaps (take-off) – NB (Narrow Body)	FS = [1.7%] * N_{dep} * FBTO	N _{dep} = number of annual departures FBTO = fuel burned on take-off in "Business As Usual" conditions [tons]
	Minimizing flaps (take-off) – WB (Wide Body)	FS = [1.4% to 3.4%] * N_{dep} * FBTO	As above
	Minimizing flaps (landing) – NB (Narrow Body)	FS = [1.4%] * N_{arr} * FBLA	N _{dep} = number of annual arrivals FBLA = fuel burned on landing in "Business As Usual" conditions [tons]
	Minimizing flaps (landing) – WB (Wide Body)	FS = [3.2% to 7.6%] * N_{arr} * FBLA	As above



Sub-category	Measure	Rule of thumb	Notes
	Minimizing reversers use	FS = REV * Narr	REV = = 0.026 tons/landing for Narrow Body aircraft; = 0.073 tons/landing for Wide Body aircraft with 2 engines; = 0.100 tons/landing for Wide Body aircraft with 4 engines
	E-taxi (only for B737 and A320)	FS = [0.01041 tons/min] * ETT * Nops	ETT = time E-taxiing [min] Nops = number of E-taxiing operations per year <i>Note: 0.01041 tons/min is valid for B737 or A320</i>
	Single engine taxi – NB (Narrow Body)	FS = [28%] * FCtaxi * Tloff * Nops	[...] = fuel saving fraction (suggested value) FCtaxi = average fuel consumption per minute during taxi. Suggested values: narrow-body aircraft = 0.012 tons/min; 2-engines wide-body aircraft = 0.033 tons/min; 4-engines wide-body aircraft = 0.054 tons/min Tloff = time with 1 engine off [mins] Nops = number of operations per year
	Single engine – WB (Wide Body) (2 engines)	FS = [28%] * FCtaxi * Tloff * Nops	As above
	Double engine – WB (Wide Body) (4 engines)	FS = [28%] * FCtaxi * T2off * Nops	As above, with: T2off = time with 2 engine off [mins]



Sub-category	Measure	Rule of thumb	Notes
Optimized aircraft maintenance	Engine wash	FS = [1%] * N * HFC * OH	FS = annual Fuel Savings [tons] N = annual number of aircraft on which engine wash has been applied HFC = average fuel consumption per hour [tons/h] OH = annual average operating hours [h]
	Zonal dryer	FS = [1%] * N * HFC * OH	N = annual number of aircraft on which zonal drier has been applied HFC = average fuel consumption per hour [tons/h] OH = annual average operating hours [h]
Selecting aircraft best suited to the mission	Selecting aircraft best suited to the mission	FS = Σ[HFC(BAU) * OH(BAU) – HFC(OPT) * OH(OPT)]	The formula sums up the fuel savings (FS) coming from the replacement of each aircraft actually used in BAU (Business As Usual) operations with the aircraft best suited for the mission (OPT)



Sub-category	Measure	Rule of thumb	Notes
Airfield improvements	Construction of runways	Use IFSET or $FS = FC_{taxi} * \Sigma(TS_{arr} * N_{arr} + TS_{dep} * N_{dep})$	<p>FS = annual Fuel Savings [tons]</p> <p>TS_{arr} = estimated average time saved on arrivals from the additional runway or taxiway or taxiway-exits and/or speed-exit [min]</p> <p>N_{arr} = annual number of arrivals</p> <p>TS_{dep} = estimated average time saved on departures from the additional runway or taxiway or taxiway-exits and/or speed-exit [min]</p> <p>N_{dep} = annual number of departures</p> <p>FC_{taxi} = average fuel consumption per minute during taxi.</p> <p>Suggested values: narrow-body aircraft = 0.012 tons/min; 2-engines wide-body aircraft = 0.033 tons/min; 4-engines wide-body aircraft = 0.054 tons/min</p>



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