

Airports Council International (ACI) views concerning the airport industry's expectations of the CAAF/3

Introduction

In June 2021, ACI member airports agreed a Long-Term Goal of achieving Net Zero by 2050 and urged governments to provide the necessary support to achieve this goal. This was followed in October 2021 by a similar goal across the entire aviation industry following coordination by the Air Transport Action Group (ATAG) of which ACI is a Board member.

In October 2022 the 32nd ACI World Annual General Assembly applauded the adoption by States at the 41st ICAO Assembly to a Long-Term Aspirational Goal of Net Zero by 2050 and called upon ICAO and States to work with industry to identify the impacts, and to update the regulatory framework to accommodate the integration of alternative fuel sources at airports.

And, in June 2023 the 33rd ACI World Annual General Assembly further called on ICAO and States to stimulate SAF deployment in the most efficient way, considering fuel accounting mechanisms to minimize transportation and the need to have supply at every airport, and provide an enabling environment including policy support, sustainability criteria, monitoring of progress, financing support, and capacity building.

ACI recognizes the steps already taken by ICAO and its Member States in supporting the development, certification and deployment of SAF and joined the ACT-SAF program in February 2023.

ACI welcomes the considerable work already undertaken by ICAO as presented in the Submission "*Possible CAAF/3 outcomes for consideration by pre-CAAF/3 consultation*". It particularly welcomes the recognition that ICAO had "*heard the industry calls to help reduce risk and attract investment by providing greater regulatory certainty ... and better access to financing, by establishing better collaboration and coordination between all stakeholders.*"

Building blocks

#1 – Policy and planning

The eyes of the world will be on Dubai, first on CAAF/3 and then on COP28. ICAO must demonstrate continued leadership for climate action for the international civil aviation industry. The Vision, indicated as "x" in paragraph 1 of the Building Block, must be quantified and be ambitious to ensure credibility. As paragraph 2 says, this provides a focus for the global ambition, and is qualified by paragraph 3 recognizing that not all States will be able to move at the same speed. The overview recognizes the linkage between elements in Block 1 and Block 4 (financing).

In its submission, the International Coordinating Council of Aerospace Industry Associations (ICCAIA) has suggested that current projects launched or announced are

expected to bring global production of SAF to 20 – 25 million tonnes by 2030 which could in itself mean a reduction of emissions of CO₂ by 5%. This is considered by ACI as a necessary starting point for setting a meaningful vision, which might be further increased to help stimulate new investment in additional facilities in the timeframe. ICCAIA has also suggested further milestones for 2035 and 2040 which ACI would also support.

This Block also recognizes that reaching the Vision is a collaborative effort with action required from all stakeholders and suggests some actions that airports might take (in paragraph 8.b). Airports are already taking action in a number of ways, most importantly by engaging with fuel suppliers, airlines, and local and national regulators. Although drop-in fuels will need very little by way of changes to infrastructure there will need to be essential changes to accommodate the longer-term supply of 100% SAF. The “*as appropriate, including*” qualifier is important here.

Airports support airlines' and other aircraft operators' transitions from conventional fossil fuels to SAF and other alternative fuels and are committed to collaborating with them on this journey.

#2 Regulatory Framework

ACI recognizes the value to all States of establishing clear fuel accounting rules. These should be on a non-discriminatory basis and be neutral in fiscal impact as between SAF producers and users – many airports are unlikely to have access to physical SAF without excessive transport or distribution costs but would nonetheless wish to be able to provide SAF accredited fuel to their users. In particular, airports wish to avoid aircraft operators being required to tanker SAF. This may be particularly important where States have introduced mandates: the EU has set a blend mandate of 6% by 2030.

A “book and claim” concept should be developed in a way that allows all participants to benefit, and which avoids unintended consequences – ACI is ready to participate in such discussions from an airport perspective.

#3 Implementation Support

As previously mentioned ACI joined the ICAO ACT-SAF program in February, but indeed has been supporting its airport members in decarbonisation for many years, not least with the Airport Carbon Accreditation [program](#). At the higher levels of certification, the program requires airports to measure and report their Scope 3 emissions, to include these in a roadmap aligned with the net zero 2050 goal, and to engage with their operational stakeholders to foster reductions in those emissions.

ACI recognizes that availability of feedstock will vary by location and region and fully supports measures which aid the development and acceleration of feedstock production.

ACI supports its members across all regions in implementation of safety, security, and environmental protection through its Airport Excellence (APEX) programs, training courses, and publications (many in collaboration with ICAO) and will continue to provide this support in the delivery of global SAF deployment – we need to ensure that no airport is left behind.

#4 – Financing

Airports operate under a wide variety of business models and regulatory regimes, and these will have an impact on the degree of engagement each can have with respect to financing. Nonetheless, many play an important role in the shaping of national policy, and all have a shared interest in reducing the environmental impact of aviation. In this respect they can provide support as facilitators in the discussions between all relevant parties. The most successful SAF programs to date, such as those in San Francisco and Heathrow have occurred because of the initiative and direct engagement of the airport with fuel suppliers, airlines and governments.

ACI welcomes the recognition in the ICAO submission that “*some financing instruments require cooperation and collaboration between stakeholders, including States, industry and public and private financial institutions to mitigate the investment risk*” and airports will play their full part in engaging in this cross-stakeholder collaboration. The aviation industry, including airports, will also require financial support at national and international level from institutional stakeholders.

Conclusion

ACI would like to emphasize its commitment to the ICAO process and the adoption of the LTAG at the last Assembly. Progress must now be made in implementing LTAG and ACI therefore supports and calls for measures to deliver that goal and the Vision to be adopted at CAAF/3, including:

- an ambitious quantified goal for 2030 – some airlines and others have set themselves a 10% by volume goal, and ICCAIA has suggested a 5% energy efficiency goal as a necessary starting point, which ACI supports
- a fuel accounting mechanism that would allow all States to participate both in the production and use of SAF on a non-discriminatory basis – ICAO should establish the global principles, but not manage it directly
- a clear regulatory framework that helps de-risk the SAF sector for investors and the finance community, and at the same time provides the necessary support to developed and developing countries
- recognition of the need for adequate public funding to support advanced technologies and infrastructure that enable expanded SAF production and distribution capacity, development of fuel-efficient aircraft, and more efficient operations
- a review mechanism before 2030, possibly a CAAF/4, to assess progress and consider further measures to reach ICAO’s Long-Term Aspirational Goal.