

## PRE-THIRD CONFERENCE ON AVIATION ALTERNATIVE FUELS

### Views on the outcome of the 3<sup>rd</sup> Conference on Aviation and Alternative Fuels (CAAF/3) provided by Spain on behalf of the European Union and its Member States<sup>1</sup>, the other Member States of the European Civil Aviation Conference<sup>2</sup>, and EUROCONTROL

#### Background

1. The adoption of the global Long-Term Aspirational Goal (LTAG) of net-zero CO<sub>2</sub> emissions from international aviation by 2050 is a historic achievement, which is in line with the Paris Agreement temperature goal.
2. The CAEP report on the feasibility of an LTAG and the different roadmaps from the industry demonstrate the fundamental role for Sustainable Aviation Fuels (SAF) in achieving this goal. In Europe, many states have already adopted long-term policies on SAF<sup>3</sup>, which aim to create the regulatory and investment certainty to overcome challenges of SAF supply and uptake and which will contribute to achievement of the LTAG.
3. Following the adoption of LTAG, the 3<sup>rd</sup> Conference on Aviation and Alternative Fuels (CAAF/3) is the first major opportunity for a tangible step forward on the way to net zero CO<sub>2</sub> emissions for international aviation and the first test of ICAO States' commitment to the goal they have collectively adopted.
4. More precisely, in Assembly Resolution A41-21 (paragraph 25, point f), the Assembly requested the Council to:

“(…) convene the CAAF/3 in 2023 for reviewing the 2050 ICAO Vision for SAF, including LCAF and other cleaner energy sources for aviation, in order to define a global framework in line with the No Country Left Behind (NCLB) initiative and taking into account national circumstances and capabilities;”
5. The aim of CAAF/3 is therefore the definition of a global framework supporting the development, production, and use of SAF, LCAF and other cleaner energy sources, such as electricity and hydrogen, while respecting the principles set out in point (f) copied above.
6. We commend ICAO for its organisation of the Environmental Regional Seminars and Pre-CAAF/3 Policy and Finance Consultation in preparation for the CAAF/3, which have shown the commitment of ICAO States and stakeholders to work towards the achievement of the LTAG as well as recognition of the important role of SAF and the new economic opportunities it brings. Especially, during the consultation event it was very clear that to attract investors to the development and production of cleaner energy sources in the aviation sector, and thus enable the growth of this new industry in all world regions, a clear and stable framework must be established.

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<sup>1</sup> Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxemburg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden

<sup>2</sup> Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, Georgia, Iceland, Moldova, Monaco, Montenegro, North Macedonia, Norway, San Marino, Serbia, Switzerland, Türkiye, Ukraine and United Kingdom

<sup>3</sup> Information available at the European SAF Map: <https://www.eurocontrol.int/shared/saf/>

## Key elements of CAAF/3 outcome

7. The global framework referred to in the Resolution is a holistic approach which must consist of several pillars as per the following.

### *Ambition and environmental integrity*

8. In accordance with Resolution A41-21<sup>4</sup>, CAAF/3 should update the 2050 ICAO Vision for Sustainable Aviation Fuels (“the 2050 Vision”) “to include a quantified proportion of such fuels to be used by 2050”.
9. This outcome should consist of setting a global quantified objective for 2050 with a trajectory to 2050, aimed at progressively reducing aviation CO<sub>2</sub> emissions through the use of cleaner sources of energy. For monitoring the progress achieved and to ensure that policy and support can be quickly adjusted if needed, a trajectory to 2050 in line with the net zero CO<sub>2</sub> emissions goal by 2050, and more specifically with the integrated scenario 3 of the CAEP report on LTAG feasibility, should be defined. The CAEP report presented different fuel scenarios and is the best available source of information for that. Like the net zero CO<sub>2</sub> goal, the objective set out at CAAF/3 and the trajectory should be aspirational, set at a global level and not impose obligations on regions or countries.
10. The fundamental need is to send a clear signal through ICAO of the global vision for aviation cleaner energy, whilst acknowledging the emissions reduction potential of the many different pathways to get there. This can best be achieved with a metric measuring carbon intensity reduction compared to a situation where conventional kerosene would have been the only fuel in use in international aviation. This metric has been at the core of the methodology used in the CAEP report on LTAG and is consistent with the aims of CORSIA. It also provides flexibility for each State or region to adopt the measures that are best suited to their circumstances. It allows for appropriate tracking of the progress towards the LTAG and provides a benchmark for comparison.
11. We invite CAAF/3 to decide on the level of global ambition envisaged in terms of carbon intensity reduction for the updated 2050 ICAO Vision, based on LTAG. To align with a feasible and cost-effective transition to net zero 2050, we consider that the trajectory should reflect a high level of ambition outlined by the LTAG report, recognising the importance of in-sector measures and the significant opportunity of SAF for reduction of CO<sub>2</sub> emissions.

### *Accounting and monitoring of CO<sub>2</sub> emissions reductions*

12. Monitoring of progress on the agreed trajectory towards the 2050 Vision needs to be facilitated by ICAO’s development of harmonised information to be regularly reported and published by States and ICAO.
13. The updated 2050 Vision should recognise the key importance of avoiding multiple claims of the same emissions reductions (past or future) generated by production, supply and use of cleaner energy by different states and operators, thus minimising any risk of double counting at national and international level. ICAO’s role in developing guidance and creating capacity in all ICAO States to monitor and report use of and policies on cleaner energy will be crucial in this respect.

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<sup>4</sup> See recital: “Further noting (...) the need to update the 2050 ICAO Vision to include a quantified proportion of such fuels to be used by 2050;” which recalls what was agreed in paragraph 3 of the 2050 ICAO Vision agreed by CAAF/2 in 2017.

14. CORSIA already includes some elements of a “book and claim” mechanism. Specifically, claims of emissions reductions from the use of CEF by an aircraft operator are based on purchase and blending records, and the physical uplift of CEF is not attributed to a specific flight. We believe it prudent to gain experience of this in the context of implementation of CORSIA and assess whether improvements are necessary.
15. Before considering the need for any new fully-fledged global accounting mechanism, ICAO will need to ensure that it adequately addresses risks of double counting, reduced traceability, potential barriers to entry and unequal distribution of CEF worldwide.
16. It is therefore suggested that ICAO continues this work, through CAEP, with a view to exploring the impacts, advantages and drawbacks of such systems. In doing so, it should take the time to assess whether this is a policy which is worth pursuing globally or which works best at national or regional level, the advantages of linking it to CORSIA implementation, and what could be the role of ICAO in a global “book & claim” mechanism.
17. State Action Plans play an important role in reporting on emission reductions achieved through the use of cleaner energy as well as on the policies and roadmaps pursued at national and regional level, to allow monitoring of progress towards the LTAG.

#### *Assistance, Capacity Building, Policy*

18. The global framework should include acknowledgement of the roles of policy, regulatory, capacity building and financial measures to support the implementation of States’ roadmaps. The reduction of CO<sub>2</sub> emissions through cleaner energy sources is not only a cost, but more importantly a powerful opportunity for new revenue streams and economic development in all regions.
19. We commend ICAO for developing the ACT-SAF initiative, which is instrumental in creating capability to develop and deploy SAF worldwide. We encourage States and non-state stakeholders to become partners of the ACT-SAF initiative. We are already contributing to this end, and are committed to continue providing such support in line with the ‘No Country Left Behind’ initiative.
20. In line with ICAO’s longstanding inclusive principles, the outcome of CAAF/3 should recognise that not all States have the same circumstances and there is no ‘one size fits all’ solution. States at different stages of their cleaner energy policies, should all be encouraged to pursue ambitious goals, although their contribution may take different forms. States and regions may need to pursue a mix of cleaner energy measures defined according to their respective situation.
21. In line with the “No Country Left Behind” initiative, inclusivity and solidarity needs to remain a core principle of clean energy transition. It is of utmost importance to assist all States to contribute to the achievement of the net-zero CO<sub>2</sub> emissions goal. In particular, many States can benefit from capacity-building to identify business opportunities and acquire technical expertise including on accessing finance.
22. The global framework should recognise the economic and social development potential of SAF for States endowed with resources that would allow them to play a role in this transition. It should also facilitate the qualification and certification of fuels produced everywhere in the world under the CORSIA sustainability criteria.

## *Access to Finance*

23. We commend the current initiative of ICAO to gather the communities of public and private investors to inform on the opportunities to finance the clean energy transition within the aviation sector. This realisation of these opportunities is a necessary condition to deploy the financial resources that are required to achieve the LTAG. We support the on-going work in ICAO to explore a platform-oriented approach which, among other things, would facilitate matchmaking between projects and investors, and outreach to financial institutions.
24. Furthermore, the existing initiatives and alliances bringing together producers, suppliers, technology providers and end users with public and private investors and authorities could be explored as a way to help to incubate and speed up international projects and encourage cross-sectoral cooperation.

## **Conclusion**

25. We strongly believe CAAF/3 can be a major step forward in the development and deployment of SAF, along with an opportunity to shift the mindset from “feasibility” to “opportunity” and to define a global framework for cleaner energy that will support a sustainable future for the sector across the world.
26. It is time for aviation to respond vigorously to the defining challenge of our time, by setting an ambitious global ICAO Vision and trajectory for cleaner aviation fuels, which will send a clear signal to investors and help unlock the economic potential of these fuels.
27. We invite the conference to adopt an update of the 2050 Vision and establish a robust Global Framework for Aviation Clean Energy to guide the collective effort of the aviation sector in the coming decades to achieve the goal of net zero CO<sup>2</sup> emissions by 2050.

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