

PRE-THIRD CONFERENCE ON AVIATION ALTERNATIVE FUELS

(Montréal, Canada, 25 to 26 September 2023)

Views on the possible outcome of the 3rd Conference on Aviation and Alternative Fuels (CAAF/3) provided by the International Coalition for Sustainable Aviation (ICSA)¹

The International Coalition for Sustainable Aviation (ICSA) welcomes the opportunity to provide comments in preparation for the 3rd Conference on Aviation and Alternative Fuels on the “Possible CAAF/3 outcomes for consideration by pre-CAAF/3 consultation” document prepared by the Small Group for Preparation of CAAF/3, under the Climate and Environment Committee of the ICAO Council.

As noted in the draft document prepared by the Small Group, there is a significant divergence of views in three main areas of the global framework: (1) the vision itself, (2) the accounting methodologies, and (3) the means of implementation or financing.

While all these areas are relevant and will need to be resolved, ICSA is of the view that not all of them have the same importance, nor require the same level of urgency (for instance, discussions on the means of implementation seem premature and should be part of any potential post CAAF/3 negotiations). First and foremost, **the pre-CAAF/3 consultation and the CAAF/3 need to focus on building consensus around a Vision consistent with the 2050 zero carbon goal** as enshrined in Resolution A41-21.²

This implies a need to focus on defining an **ambitious vision that prioritizes the environmental and social integrity of alternative fuels**. To that end, ICAO should build on the work accomplished to date by the Committee on Aviation Environmental Protection (CAEP). In particular, the CAEP report on the Long-Term Aspiration Goal (LTAG) provides an **aspirational trajectory** consistent with the goals for CAAF/3 (see, notably, integrated scenario #3). The trajectory for alternative fuels in this scenario should inform the CAAF/3 discussion on a suitable vision. The CAAF/3 meeting should also build on the Carbon Offsetting and Reductions Scheme for International Aviation (CORSIA) Sustainability framework for CORSIA eligible fuels, recognizing the need for **continuous improvement**.

Setting an aspirational goal for alternative fuels requires adopting, primarily, a **metric** that focuses on the **carbon intensity of alternative fuels on a lifecycle basis**, consistent with the methodology applicable to CORSIA eligible fuels, which quantifies emissions reductions as compared to conventional jet fuels.

¹ The **International Coalition for Sustainable Aviation (ICSA)** is a network of non-profit organizations representing millions of members worldwide. ICSA member organizations include Aviation Environment Federation, Carbon Market Watch, Environmental Defense Fund, the International Council on Clean Transportation, Transport & Environment, and WWF.

² https://www.icao.int/environmental-protection/Documents/Assembly/Resolution_A41-21_Climate_change.pdf

This metric could be complemented, if necessary, with the **proportion of conventional aviation fuels to be substituted** with alternative fuels, as endorsed in the CAAF/2 Declaration with the 2050 Vision for Sustainable Aviation Fuels.³ But the focus should always be on **quality rather than quantity**.

In addition to a robust sustainability standard, CAAF/3 should emphasize transparency **to ensure that alternative fuels are accurately reported and accounted for**. Avoiding double claiming is critical for the integrity of the CAAF/3 Vision. Any discussions on concepts such as **book and claim** are out of context and – in any event— premature until robust reporting and accounting methodologies are in place to avoid double claiming. It is critical to note that Parties to the Paris Agreement need timely access to relevant information on the features and usage of CORSIA eligible fuels to be able to meet their own reporting and accounting obligations and avoid double claiming. Unfortunately, that is not the case yet, meaning that unless ICAO takes swift action before the end of 2023, any CORSIA eligible fuel claim beginning in 2024 would be prone to double claiming. Any such lack integrity risks undermining public confidence. Embarking on discussions around book and claim before adopting categorical measures to avoid double claiming would only exacerbate the problem.

Finally, when defining the CAAF/3 Vision, the pre-CAAF3 consultation meeting should pay careful attention to its use of **terminology**. This is particularly relevant as the original CAAF/2 vision focused solely on Sustainable Aviation Fuels (SAF), whereas the scope for CAAF/3 has been expanded to cover not only other *cleaner energy sources* such as cryogenic hydrogen and electricity, but also *Lower Carbon Aviation Fuels* (LCAF) of fossil origin. ICSA believes that while LCAFs may have potentially lower carbon emissions on a lifecycle basis, all fuels of fossil origin must, by definition, be regarded as unsustainable. Additionally, LCAF can only marginally reduce carbon emissions on a lifecycle basis and therefore cannot contribute effectively to a sustainable aviation future. There are instances in the draft document prepared by the Small Group where the concept of “sustainable fuels” is used to refer to SAF, LCAF and other cleaner energy sources alike. The CAAF/3 vision should **avoid the use of encompassing terms such as “sustainable fuels”** and instead use suitable terms such as “alternative fuels”. This is particularly relevant when referring to LCAF.

The CAAF/3 meeting is an important opportunity for ICAO to develop a vision that will contribute to the decarbonization goals of the LTAG, while fostering cooperation amongst states and helping to create the certainty that is required to support investment in alternative fuels. ICSA believes this is achievable while maintaining high standards of environmental integrity and credibility, and we look forward to a successful outcome at CAAF/3 in November.

³ <https://www.icao.int/Meetings/CAAF2/Documents/CAAF2%20SD%20day%203.Final.pdf>