

Jointly regulating jet fuel aromatic and sulfur content: A near-term strategy for public health and climate benefits

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Introduction

Aircraft engines combust fuel imperfectly and incompletely, emitting combustion side products derived from fuel impurities and high-temperature reactions with air. Among these products, fine particulate matter with aerodynamic diameters of 2.5 microns and below ($PM_{2.5}$) have an outsized impact on regional air quality, public health and the climate.

Aromatic compounds, which can constitute up to 25% by volume of jet fuel, are responsible for substantial non-volatile $PM_{2.5}$ formation, a primary or direct source of particulate matter.¹ Low levels of sulphur compounds in jet fuel are responsible for sulphur dioxide (SO_2) formation, a volatile particulate matter (vPM) that is the precursor of sulphate aerosols, a potent secondary $PM_{2.5}$.²

Interventions focused on jointly reducing jet fuel aromatic and sulphur content present an opportunity to significantly reduce $PM_{2.5}$ emissions from both new and in-service aircraft, delivering significant public health and climate benefits in the near term. Furthermore, a swift focus on cleaning jet fuel could also facilitate the development of advanced aircraft engine combustor technologies designed

to reduce NO_x emissions,³ which continue to be a key gaseous pollutant of concern for aviation.

Regulating jet fuel aromatic content to reduce non-volatile particulate matter (nvPM) is widely recognized as a valid and complementary strategy to aircraft engine standards. However, to date, there is no regulation tapping on its outstanding potential for reducing these emissions. ICAO adopted nvPM emission standards for aircraft engine design in 2017 and 2020. These standards focus not only on particulate matter (PM) mass concentration but also PM number, emphasizing ultrafine particulate (UFP) matter. These technology-following standards were not designed to improve air quality or reduce non- CO_2 climate impacts, but rather to prevent backsliding without impacting in-service aircrafts.

Studies have demonstrated that blending synthetic alternative fuels, free of aromatics, with conventional jet fuel can significantly reduce non-volatile PM emissions, with reductions proportional to the change in aromatic content. These reductions are markedly greater at low to medium thrust conditions⁴ (e.g., on the ground when idle or taxiing or during cruise and landing) than at high thrust levels. For instance, a blend comprising 32% synthetic fuel

1 ASTM International, 2021

2 Lee et al., 2020

3 Holladay et al., 2020

4 Schripp et al. 2022

and 68% conventional jet fuel has been shown to lower non-volatile PM emissions by an average of 25% in mass and 20% in number on average during landing and take-off; the same blend at low thrust conditions achieved as much as 60% decrease in PM concentrations.⁵ A 50:50 blend of conventional jet fuel and synthetic fuel reduced PM number and mass emissions immediately behind a cruising aircraft by 50 to 70%.⁶ The exact reduction for any given flight is difficult to pinpoint, as PM reductions are influenced by factors such as engine class and age, engine thrust settings and the aromatic content in the conventional jet fuel used in the blend.

Existing jet fuel specifications limit sulphur content to no more than 3,000 parts per million (ppm) by mass, primarily to prevent the formation of corrosive compounds that can damage turbine metal parts.⁷ Regulations for road transport diesel, implemented over the last few decades in countries and regions such as the European Union, China, India, Canada, Japan or the United States mandate a maximum sulphur content of 10 or 15 ppm to lower emissions of harmful particulate matter and sulphur oxides. For reference, according to the U.S. Environmental Protection Agency, unregulated diesel in the United States contained as much as 5,000 ppm of sulphur. Many other countries have already adopted or are quickly moving towards ultra-low sulphur diesel (ULSD) regulations. These regulatory efforts offer a potential model for regulatory advancement in the aviation sector, which should also tap on synergies with ULSD production to expedite the transition to ultra-low sulphur jet fuel.

While individual Member States could unilaterally implement measures to regulate sulphur and aromatic content in jet fuel, such interventions would primarily apply to fuel uplifted within their own jurisdictions. As a result, they would presumably only cover domestic aviation and the departing leg of international flights, leaving emissions from arriving flights unaddressed. Given the need for

coordinated action to achieve the greatest reductions in PM emissions across the full scope of international aviation, ICAO stands as the most appropriate body to facilitate such cooperation and ensure meaningful, global outcomes.

Public health effects

Human exposures to ambient PM_{2.5} are associated with several adverse health effects. There is “causal relationship” between long- and short- term exposures to PM_{2.5} and mortality and cardiovascular effects; “likely causal relationship” between long- and short- term PM_{2.5} exposures and respiratory effects, nervous system effects and cancer.⁸ These risks are present even at dosages in compliance with regulatory limits, meaning that compliance does not yet guarantee safety from pollution-related harms. A recent research program in Canada, Europe, and the United States reported associations between mortality and long-term exposure to low levels of ambient pollution satisfying each jurisdiction’s clean air laws.⁹

Due to the confluence of transport modes and associated industrial infrastructure at major metropolitan hubs, the pollution footprint of aviation activity often overlaps with that of truck, train, and ship traffic. Even then, turbine engine aircraft contribute a potentially more acute risk to the mix: source-differentiating studies of aviation’s effect on air quality consistently show elevated UFP matter in and around airports.¹⁰ When compared to particle size distributions from other mobile sources, aircraft’s fingerprint tends toward the sub-20-nanometre end of the PM_{2.5} range.¹¹ UFP may pose greater danger than larger PM_{2.5} fractions. Some literature suggests that sub-100 nanometre UFP deposits deeper in the lung during inhalation, has a high surface area-to-mass ratio, and can permeate through the alveolar membrane into the blood stream.¹²

5 Durdina et al., 2021

6 Moore et al., 2017

7 ASTM International, 2021

8 EPA, 2019

9 Health Effects Institute, 2016-2022

10 Austin et al., 2019; Hsu et al., 2013; Lammers et al., 2020; Lopes et al., 2019; E. A. Riley et al., 2016; K. Riley et al., 2021; Stacey, 2019; Westerdahl et al., 2008

11 Austin et al., 2019; E. A. Riley et al., 2016; Stacey, 2019

12 Bendtsen et al., 2021; Lammers et al., 2020

Airport workers are facing a major occupational hazard. Proximity to running jet engines is associated with heightened exposure to nano-sized particles and volatile organic compounds (VOCs), and in turn with increased risks of disease, hospital admissions and self-reported lung symptoms.¹³ Communities adjacent to aircraft landing and take-off activity are also exposed to concentrated pollutant release from flightpaths directly overhead.¹⁴

On a global scale, aviation-attributable PM_{2.5} and ozone (O₃) have been estimated to be responsible for approximately 16,000 premature mortalities each year and, of those, around a third occur within 20 km of an airport due to aviation-attributable PM_{2.5}.¹⁵ This suggests that, in addition to the contributions of PM_{2.5} emissions to regional air quality, impacts on public health in the vicinity of airports are an important public health concern.¹⁶ A recent re-evaluation of that study, using greater resolution and updated epidemiological data, finds that the aviation's global air quality impacts due to aviation-attributable PM_{2.5} and O₃ are greater than previously estimated, increasing the total premature mortalities attributable to 74,300 each year globally. Of those, PM_{2.5} emissions account for around 21,200 premature mortalities.¹⁷

A study focused on China employing high-resolution emissions inventories and chemical transport modelling based on the actual trajectory of all aircraft flights estimated that aviation-attributable ambient PM_{2.5} and O₃ exposures were responsible for around 67,000 deaths in China alone, with populous coastal regions in Eastern China suffering the most due to the dense aviation activity.¹⁸ Another study based on 24-hour average PM_{2.5} concentration of airport aircraft activities in China estimated that around

21,200 deaths in 2023 were due to aviation-attributable PM_{2.5} emissions.¹⁹

Non-CO₂ climate impacts

In addition to delivering air quality improvements in and around airports and at the regional and global scale, controlling PM pollution can also reduce aviation's non-CO₂ climate impacts.²⁰ The non-CO₂ climate impacts of aviation constitute a significant portion of aviation's current net climate effect,²¹ with persistent aircraft condensation trail (contrail) cirrus clouds being one of the primary drivers.²² Where there are still knowledge gaps regarding contrails and contributions from various carbonaceous or non-carbonaceous PM types,²³ combustion soot particles are identified as a major constituent of contrail formation in engine exhaust. Either way, primary or secondary aerosol particles serve as condensation nuclei, becoming seed droplets for ice formation that can generate persistent contrail cirrus when flight paths intersect ice-supersaturated atmospheric conditions below a critical temperature threshold.²⁴

Recent in-situ measurements of PM emissions and contrails from cruising aircraft burning paraffinic synthetic jet fuel –produced to be essentially free of sulphur compounds and containing very low or negligible amounts of aromatic compounds— have shown a significant reduction in both PM emissions²⁵ and on ice crystals in contrails.²⁶ Since aviation soot and sulphate particles are the predominant primary and secondary aerosol from aircraft,²⁷ this suggests that jet fuel regulation controlling both aromatic and sulphur

13 Bendtsen et al., 2021

14 Austin et al., 2021; Habre et al., 2018; Hsu et al., 2013; Hudda et al., 2014; Hudda et al., 2016; Hudda et al., 2018; Hudda et al., 2020; Logan Airport Health Study, 2014; Masiol et al., 2017; Wing et al., 2020

15 Yim et al., 2015

16 EPA, 2022

17 Eastham et al., 2024

18 Zhang et al. 2023.

19 Cui et al., 2024.

20 Bier and Burkhardt, 2019; Kärcher, 2018; Märkl et al., 2024

21 Lee et al., 2020; Burkhardt et al., 2018; Kärcher, 2018

22 Lee et al., 2020

23 e.g., Singh et al., 2024

24 Bier and Burkhardt, 2019; Kärcher, 2018

25 Dischl et al., 2024

26 Märkl et al., 2024

27 Lee et al., 2020

content is also a viable pathway for mitigating radiative forcing from contrails.

Jointly regulating jet fuel aromatic and sulphur content

A regulatory constraint on jet fuel aromatic and sulphur content could be met with either cleaner conventional jet fuel and/or sustainable aviation fuels (SAF) synthesized free of aromatics. One of the key advantages of most SAF is that they are synthesized almost entirely free of aromatics and contain no sulphur, highlighting their potential as a cleaner alternative. But SAF only holds potential for reducing harmful aviation PM emissions if a tighter regulatory cap on jet fuel aromatic and sulphur content is enforced. In its absence, there is no guaranteed reduction of aromatic hydrocarbons and sulphur in fuel blends of SAF and conventional jet fuel; economic incentives and the headroom provided by the existing upper bound for aromatic and sulphur content would cancel any potential gains.

While alternative fuels pose a natural avenue for reducing aromatics and sulphur, their gradual scale-up (e.g. 5% GHG reduction goal in 2030 adopted at the ICAO CAAF/3) means their benefits in the near term will be relatively marginal. To achieve near-term benefits, efforts should focus on reducing emissions from conventional jet fuel, while simultaneously and in a coordinated manner advancing its substitution with SAF to support long-term decarbonization goals.

When it comes to reducing aromatic content of conventional jet fuel, most researchers' attention has been directed to hydrotreating straight-run jet fuel,²⁸ i.e., applying post-distillation upgrading to the entire kerosene-range atmospheric distillation cut. However, modern refineries also produce jet fuel blend stocks through routine upgrading and conversion processes such as hydrocracking. These high-quality blending streams typically have lower aromatic content and very low sulphur levels.²⁹ Indeed, targeting lower aromatic content in conventional jet fuel also removes sulphur compounds, thereby creating an opportunity to jointly regulate them.

²⁸ Faber et al., 2022

²⁹ Hemighaus et al., 2007

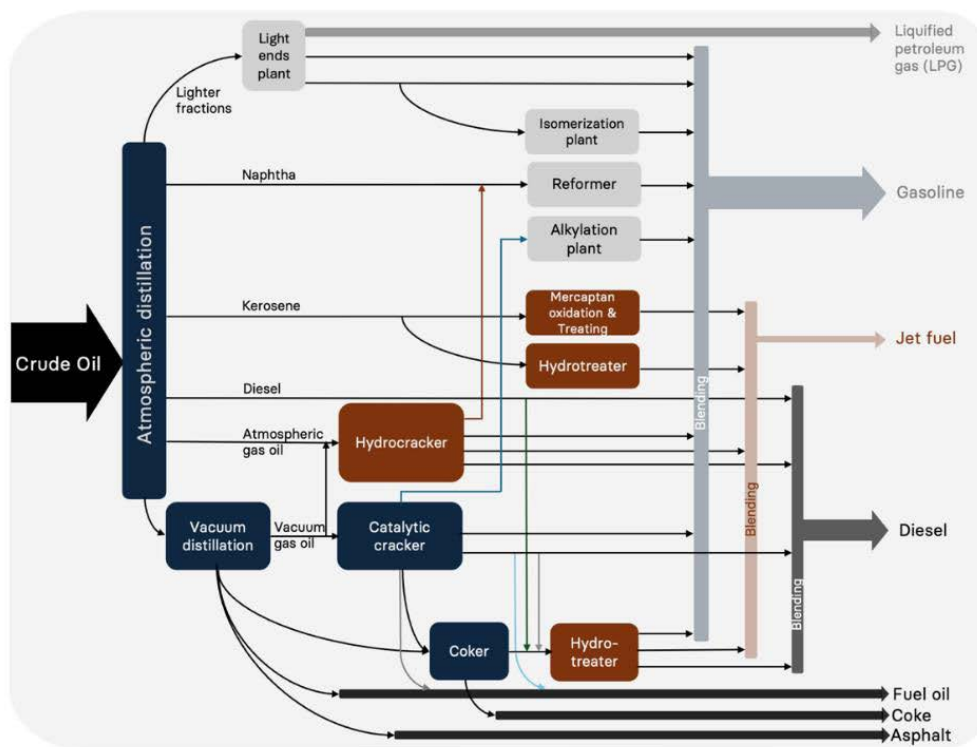


FIGURE 1: Available streams of blend stocks for jet fuel production (highlighted in brown) from all the various distillation, upgrading and conversion processes available in modern refineries. Illustrative figure adapted from Chevron Product Company's technical review on aviation fuels.³⁰

Deploying cleaner conventional jet fuel at scale implies the optimization of refinery operations to ensure that blends of available streams of jet fuel from all the various distillation, upgrading and conversion processes meet lower aromatic and sulphur content specifications in the aggregate, once the blending requirements with SAF feedstocks has been considered. Operating conditions can be optimized for a target aromatics and sulphur output by adjusting parameters such as the temperature and pressure in the reactors, residency times, the hydrogen flow rate to the reactor and the catalyst type and condition.³⁰

Figure 1 illustrates the different streams of blend stocks available for jet fuel production and their interaction with other petroleum products. The relative importance of the jet fuel blend stock streams is a function of crude oil characteristics, environmental constraints and market demand for petroleum products.

Implementing a staged approach to maximize near term benefits

Initial regulatory efforts to limit aromatic and sulphur content in jet fuel should be anchored in existing fuel specification frameworks, rather than pursuing structural changes to current jet fuel standards. According to ASTM International standards D1655 (for fossil jet fuel) and D7566 (for blends of synthetic and fossil jet fuel), the maximum allowable aromatic content by volume is 25%, although industry practices typically aim for 15-20%.³¹ Whereas the D1655 standard has no specified minimum, the D7566 standard further requires a minimum aromatic content of 8% to prevent shrinkage of aged elastomer seals, which could cause fuel leakage.³² Thus, setting the aromatic content at 8%, or as close to this target as practicable, would be compatible with existing airworthiness certifications and performance requirements.

³⁰ Hemighaus et al., 2007

³¹ Faber et al., 2022

³² See, e.g., ASTM International, 2021

Lowering the threshold past 8% should come at a later stage as it requires further work to ensure safety. A complete phase-out of aromatics is possible though, provided that in-service aircraft have sufficient time to adapt using fresh seals; seals that have not yet been exposed to high-aromatics fuel appear to perform acceptably.³³ Otherwise, cycloalkanes could substitute for aromatics in achieving sufficient seal swell to prevent leakage while minimizing PM emissions and increasing energy content.³⁴

Cost estimates leveraging existing infrastructure

The cost of reducing aromatics to just above 8% (a 50% reduction) while minimizing within it the naphthalene content, a major contributor to combustion soot and black carbon,³⁵ and removing sulphur compounds has been estimated to amount to an increase in jet fuel cost for air carriers of around 2%,³⁶ or 0.4% of their operating expenses.³⁷ These estimates assume that jet fuel is hydrotreated using hydrogen from steam-methane reforming in existing hydrotreating and steam reforming units, and that jet fuel producers are in a position to pass through 100% of any cost increases to air carriers. The reduction in aromatic content and the removal of naphthalene and sulphur compounds through such hydrotreating assumptions would come with a greenhouse gas (GHG) emissions penalty of around 2.5% compared to the lifecycle GHG emissions of fossil jet fuel,³⁸ a risk that is neutralized by greenhouse gas emissions reduction programs such as the European Union emissions trading system or the California cap and trade system.

The jet fuel cost increase of 2% captures the increment in operational costs for straight-run kerosene cuts. But there are other blend stocks for jet fuel production available in the context of modern refineries from standard upgrading and conversion processes such as hydrocracking. And

these premium blending streams already have reduced aromatic and sulphur content,³⁹ potentially bringing down the overall cost.

Furthermore, as replacing aromatics with paraffinic molecules significantly increases hydrogen-to-carbon ratio in jet fuel and thereby its specific energy (energy content per unit of mass), the resulting gains in in-flight fuel efficiency could help offset any potential increment in fuel manufacturing operational costs and emissions. Higher specific energy can deliver greater range, high payload capacity, or decreased fuel consumption.⁴⁰

Key takeaways

The transition to sustainable aviation necessitates a comprehensive suite of measures spanning technological, operational, and regulatory domains, including jet fuel regulation. Within this broader framework, ICAO has a unique opportunity to drive near-term benefits for both climate and air quality.

By advancing international cooperation on jet fuel regulation targeting sulphur and aromatic content, ICAO can play a pivotal role in reducing aviation's air quality and public health impacts while supporting the sector's long-term net zero climate impact imperative.

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33 Holladay et al., 2020

34 Landera et al., 2022

35 ASTM International, 2021

36 Faber et al., 2022

37 The 0.4% estimate is based on data gathered by the U.S. Department of Transportation's Bureau of Transportation Statistics and Form 41 Financial Reports, which detail operating expenses and total jet fuel costs within the airline industry.

38 Faber et al., 2022

39 Hemighaus et al., 2007

40 Holladay et al., 2020

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