# Supporting policies to promote the development and deployment of cleaner energy for aviation — Opportunities and challenges



ICAO Environmental Regional Seminars

13 April – 8 May 2023

- I. Potential policies and coordinated approaches
- II. Estimates related to SAF costs, investment needs and production capacity of facilities
- III. Monitoring and reporting for cleaner energy
  - a) ICAO State Action Plans
  - b) ICAO Stocktaking and Tracker Tools
  - c) CORSIA MRV and Emerging SAF reporting and accounting systems
- IV. Dialogues based on guiding questions
  - a) Policies
  - b) Monitoring and reporting



I. Potential policies and coordinated approaches



#### **Need for Policies on Aviation Cleaner Energy**

- Cleaner energy production is limited by a number of barriers
  - Higher costs
  - Limited feedstock and fuel production infrastructure
  - Perceived financial risks
- In the presence of such barriers, policy intervention is required to develop cleaner energy production.
  - In general, a supporting policy framework is in place in those states where cleaner energy production has initiated
- Constraints and opportunities are specific to each State
  - Specific climates, agricultural systems, available resources, economic factors, political contexts, regulatory structures, etc.



# ICAO Guidance on Potential Policies and Coordinated Approaches for the deployment of SAF



- Developed by CAEP based on studies performed since 2016
- A support reference for ICAO States to develop SAF production
  - Insight on types of policy measures and their impacts
  - Examples of policies used or under preparation
  - Links to additional helpful resources
- Completes a toolbox of guidance material for ICAO States
- Can be used in combination with the ICAO SAF Rules of Thumb

#### Publically available on the ICAO website

#### Guidance document

https://www.icao.int/environmental-protection/Pages/saf\_guidance\_potential\_policies.aspx

#### SAF rules of thumb

https://www.icao.int/environmental-protection/Pages/SAF\_RULESOFTHUMB.aspx

#### **SAF Policy options**

# Guidance provides details on 28 types of Policy Options, divided into 3 impact areas and 8 categories

#### Impact area: Stimulating Growth of SAF Supply 1 Government 2 - Targeted incentives and tax relief to 3 - Targeted incentives and tax 4 - Recognition and valorization of SAF environmental benefits funding for expand SAF supply infrastructure relief to assist SAF facility **RDD** operation 2.1 - Capital grants; 2.2 - Loan guarantee programs 3.1 Blending incentives: Blender's Tax Credit 4.1 – Recognize SAF benefits under carbon taxation 1.1 - Government 3.2 - Production incentives: Producer's Tax 4.2 - Recognize SAF benefits under cap and-trade systems R&D 2.3 - Eligibility of SAF projects for tax advantaged 1.2 - Government business status; 2.4 - Accelerated Credit 4.3 - Recognize non-carbon SAF benefits: improvements to demonstration and depreciation/'bonus' depreciation 3.3 - Excise tax credit for SAF air quality 2.5 - Business Investment Tax Credit (ITC) for SAF 4.4 - Recognize non-carbon SAF benefits: reduction in 3.4 - Support for feedstock supply deployment investments 2.6 - Performance-based tax credit establishment and production contrails 2.7 – Bonds / Green Bonds

Impact a	rea: Creating Demand to	Impact area: Enabling SAF Markets	
5- Creation of SAF mandates 6 - Update existing pol		7 – Demonstrate	8 - Market enabling activities
to	to incorporate SAF		8.1 - Adopt clear and recognized sustainability standards and
5.1 - Mandate renewable energy volume requirements in the fuel supply 5.2 - Mandate reduction in carbon intensity of the fuel supply	<ul><li>6.1: Incorporating SAF into existing national policies</li><li>6.2: Incorporating SAF into existing subnational, regional or local policies</li></ul>	<ul><li>7.1 Policy statement to establish direction</li><li>7.2: Government commitment to SAF use, carbon neutral air travel</li></ul>	life cycle GHG emissions methods for certification of feedstock supply and fuel production 8.2 - Support development/recognition of systems for environmental attribute ownership and transfer 8.3 - Support SAF stakeholder initiatives

#### **Policy examples**

## Financing grant competitions for SAF production (USA, France)



Text - H.R.5376 - 117th Congress (2021-20 of 2022 | Congress.gov | Library of Congr

FAST Meeting - Dec. 14

2- Focus on French endeavour for SAF

Mid-2020 launched a Call for Expression of Interest to assess stakeholders' interest and needs

July 2021: calls for proposal to support the development of a French SAF production sector:

- 200 million € for pilot/demonstrator construction or engineering studies
- Closed in September 2022 5 winning projects to date

Concrete application via a mandatory incorporation mandate

- o January 2022: blending mandate of 1% implemented
- Mid-2022: launch of a working group to address the industrialization phase at government level
- December 2022 : study on PtL fuels potential in France

Direction générale de l'Aviation civile Direction du transport aérien



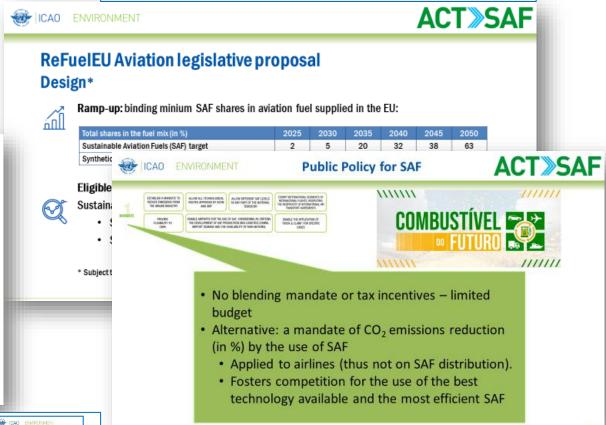


2. French endeavour for SA



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SAF blending/use mandates in energy content or CO<sub>2</sub> emissions reductions (EU, Brazil)



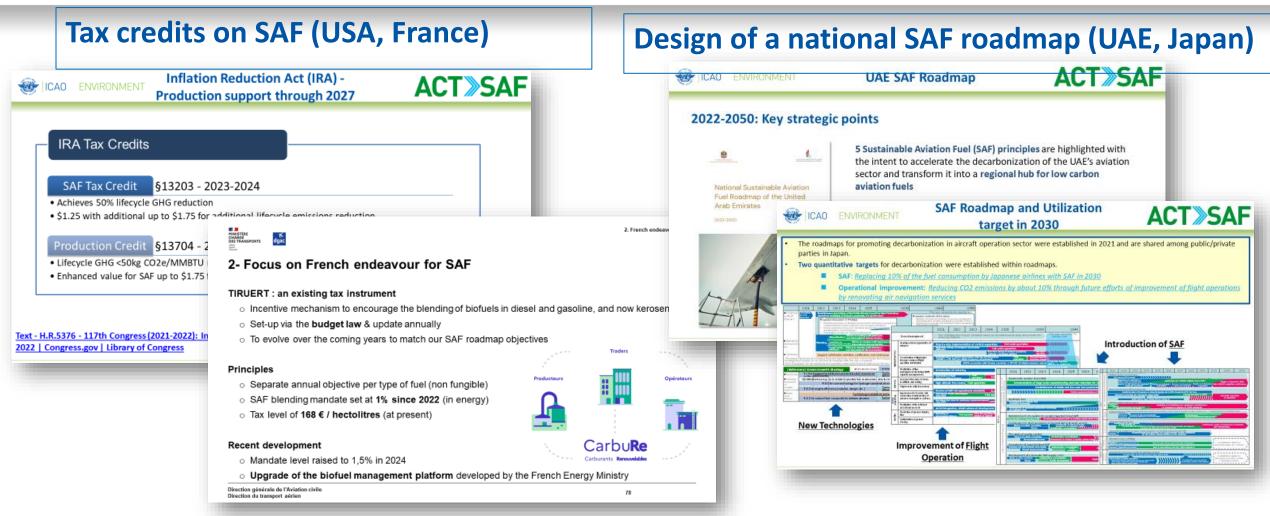
#### For details – ACT-SAF Series #4 Training –

https://www.icao.int/environmental-protection/Pages/ACT-SAF-Series.aspx





#### **Policy examples**



For details – ACT-SAF Series #4 Training –

https://www.icao.int/environmental-protection/Pages/ACT-SAF-Series.aspx





#### **Policy examples**

## Industry engagement (UAE, Japan "Act for Sky", Singapore "Buyers club for SAF")



# Defining SAF aspirational targets (Japan 10% SAF by 2030, USA 3 Billion gallons of SAF by 2030)



#### For details – ACT-SAF Series #4 Training –

https://www.icao.int/environmental-protection/Pages/ACT-SAF-Series.aspx



# Qualitative metrics for assessing policy effectiveness

1 - Flexibility	2 - Certainty	3 - Financial costs and benefits	4 - Price sensitivity to externalities
Can the policy be easily adjusted given evolving circumstances?	Certainty on timeframe, legal conditions and political decisions increase investor interest.	Policies should be assessed on the its costs benefits they deliver, including social ones.	Higher sensitivity, more unintended consequences. Floor/Ceiling prices can reduce volatility
5 - Ease of implementation	6 - Contribution to SAF deployment and GHG	7 - Unintended	8 - Robustness of

5 - Ease of implementation	deployment and GHG reduction	7 - Unintended consequences	8 - Robustness of policy
Administrative, governance and/or procedural complexity can hinder implementation.	clear criteria on target quantity, sustainability, commercial parameters and timeframe improve results	mechanisms to identify and mitigate unintended consequences (economic, environmental or social)	regulating systems to ensure that policy objectives are achieved and procedures have been followed.

# **EXAMPLE** Marginal abatement cost of CO<sub>2</sub> mitigation

#### Determining the marginal abatement cost of CO<sub>2</sub> mitigation using SAF

Evaluating the cost of abating 1 ton of CO2 with the use of SAF can be valuable for a policy maker to assess the effectiveness of a specific policy relative to other alternatives (fleet renewal, ATM operations improvement, etc.)

Cost of 1 tonne of conventional kerosene = \$600

Cost of 1 tonne of SAF = \$1100

Jet fuel combustion  $CO_2$  emissions factor = 3.16

 $CO_2$  emissions reduction factor of this SAF = 80%

Firstly, the amount of CO<sub>2</sub> reduced must be determined which is a function of the amount of SAF used, the jet fuel combustion factor and the SAF emissions reduction factor.

Net CO<sub>2</sub> emissions reduction = 2 tonnes \* 3.16 \* 80% = 5.06 tonnes CO<sub>2</sub>

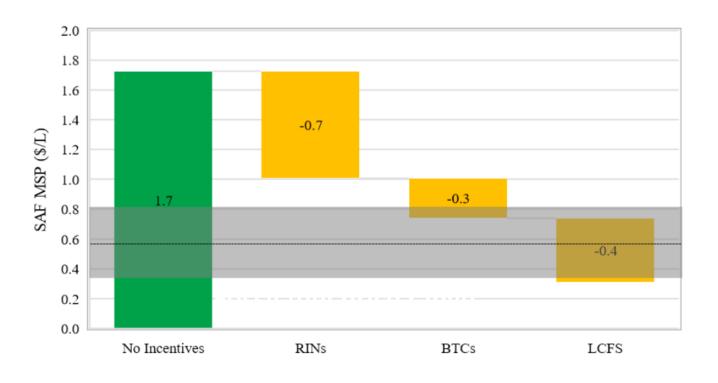
The cost per tonne of CO<sub>2</sub> reduced is found by calculating the cost difference between SAF and conventional kerosene divided by the amount of CO<sub>2</sub> reduced.

Cost per tonne of CO<sub>2</sub> reduced = 2 tonnes \* (1100-600) / 5.06 = \$197.78 / tonne



# How do policies impact SAF Minimum Selling Price?

#### The guidance illustrate the effects of policies on the SAF minimum selling price (MSP)



- Example what is the effect of the combination of 3 measures from the US policy context?
  - RINs Renewable fuel Standard
  - BTC Blenders' Tax Credit,
  - LCFS Low Carbon Fuels Standard
- Thanks to the combined measures, the MSP falls within the range of fossil jet fuel price.

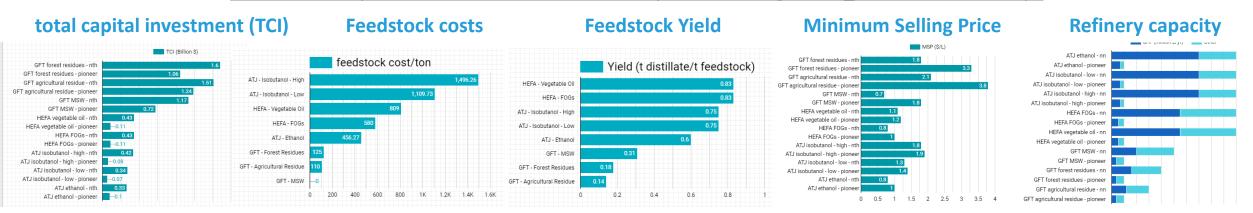


#### SAF estimates ("Rules of thumb")

# Information on costs and benefits is required to assess policy options To support such assessment, CAEP developed the ICAO SAF Rules of Thumb

- provides order of magnitude estimations on SAF costs, investment needs and production potential to inform policymakers and project developers
- First Edition (2021)
  - Conversion processes: Fischer Tropsch (FT), Alcohol to jet (ATJ) and hydro-processed esters and fatty acids (HEFA)
  - Multiple feedstocks and two technology maturity levels: "nth" and "pioneer" facilities.

Available at https://www.icao.int/environmental-protection/Pages/SAF\_RULESOFTHUMB.aspx



Latest Updates (2023) – inclusion of new pathways: pyrolysis with forest residues or agricultural residues; and FT with  $CO_2$  and  $H_2$  as major inputs (Power to Liquids – PtL)



**ICAO State Action Plans** 

#### **Purpose of State Action Plans**

#### **State Action Plans (SAPs)**



A State Action Plan is a living document that defines a State's actions to reduce CO<sub>2</sub> emissions from international civil aviation.



Within a State it is a planning and coordination tool, and it provides a clear communication route to ICAO.

#### Resolution A41-21 associates LTAG and SAP

- SAP information use for LTAG Monitoring (A41-21 Para 9)
- Invitation to submit SAPs with quantified information (A41-21 Para. 10 and 11)
- Dissemination of information to support SAP development (A41-21 Para. 12 and 13)



#### Why develop a State Action Plan?

# A State Action Plan can help States:

Report international aviation CO2 emissions

Outline their policies and actions

Provide information on their basket of measures and any specific assistance needs

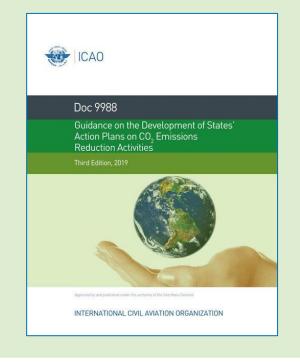
# A State Action Plan will help ICAO:

Compile information on achieving the global aspirational goals

Provide guidance and technical assistance on preparing action plans

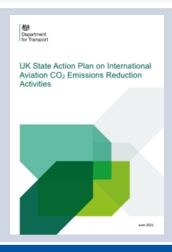
Identify and respond to States' needs for technical and financial assistance

ICAO Doc 9988
provides guidance to
develop a State Action
Plan





#### **ENVIRONMENT SAF and Cleaner Energy initiatives from SAPs**











#### United **Kingdom**

Renewable **Transport Fuel Obligation** - fuel suppliers to ensure a proportion of fuel from renewable origin

#### Canada

**Identification of local SAF** feedstocks (Canola, forestry residues, carinata, used cooking oil, poplar, camelina)

#### **Dominican** Republic

Use of photovoltaic energy in airports

#### Japan

**Target of replacing** 10% of fuel consumption by Japanese airlines with SAF by 2030

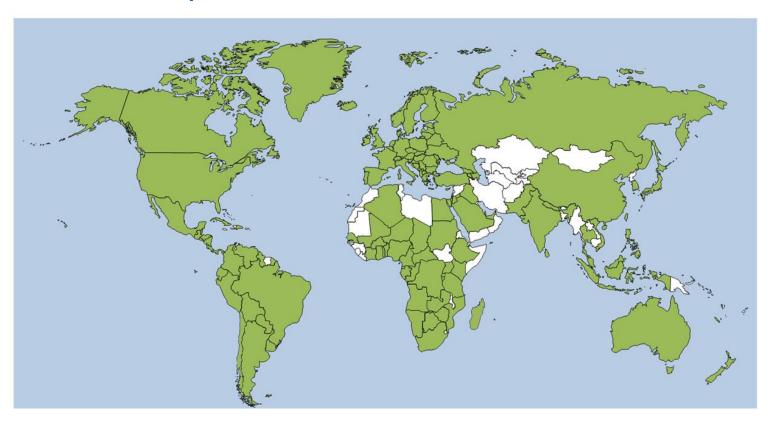
#### **United States**

**SAF** grand challenge - commitment to increase the production of SAF to at least 3 billion gallons per year by 2030

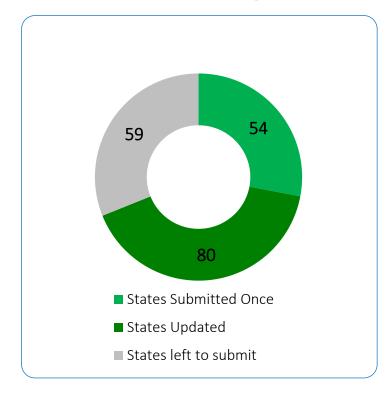


#### **State Action Plan Achievements**

# **136 States** representing **98.17% of global RTK** have voluntarily submitted their State Action Plan



## **Global SAP Submissions / Updates**





ICAO Stocktaking and tracker tools



#### **ICAO Environment Stocktaking**

# ICAO Environment Stocktaking events element for monitoring progress towards LTAG and support the review the 2050 ICAO Vision for SAF (A41-21 Para 9 and 28 f) )

- 2023 Stocktaking to be held from 11-13 July 2023
- Stocktaking is supported by the ICAO Global Coalition for Sustainable Aviation
- Update of the publication "Innovation driving sustainable Aviation"
- Support the update of ICAO tracker tools



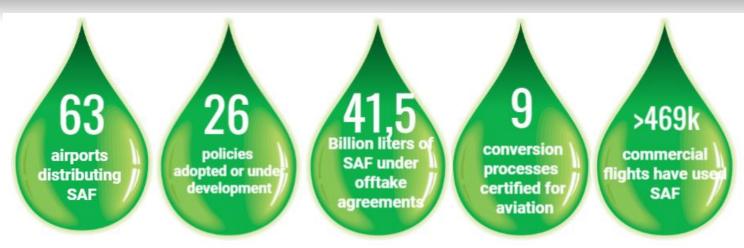




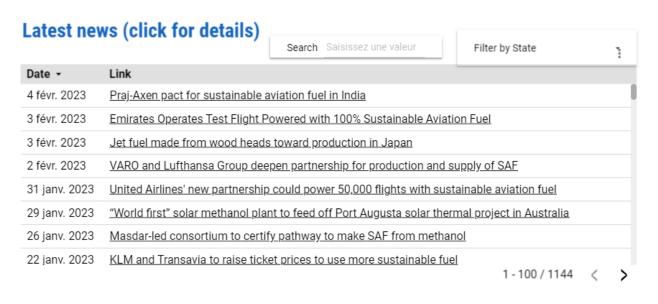


#### **SAF tracker tools**

- Updated daily
- Transparent: all data available for consultation

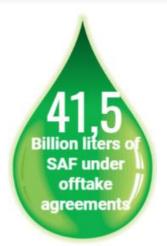




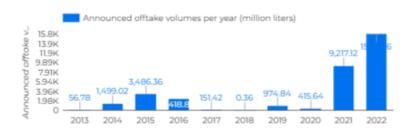


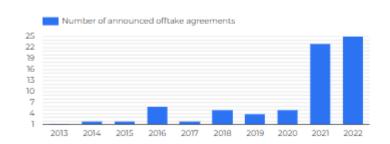


#### **SAF Offtake Agreements tracker**



Latest information on SAF purchase agreements







Filter by	Fuel producer •	Fuel purchaser	

	Date •	Fuel producer	Fuel Supplier	Fuel User / Purchaser	total offtake volume (million liters)	Length of offtake agreement (years)	Source
1.	Sep 13, 2022	OMV		Lufthansa Group	999.4	8	https://www.omv.com/en/news/220913-omv-and-luftha
2.	Sep 8, 2022	DG fuels		Delta	1457.4	7	https://www.rechargenews.com/energy-transition/delta
3.	Aug 23, 2022	Aemetis		IAG	97.4	7	https://www.canadianbiomassmagazine.ca/aemetis-to
4.	Aug 15, 2022	Gevo		Alaska Airlines	700.3	5	https://www.google.com/url?q=https://biofuels-news.co
5.	Aug 1, 2022	Shell		Lufthansa Group	2248.5	7	https://www.shell.com/business-customers/aviation/ne
6.	Jul 22, 2022	Gevo		American Airlines	1892.7	5	https://news.aa.com/news/news-details/2022/American
7.	Jul 14, 2022	Gevo		Air Lingus	118.7	5	https://www.businesstraveller.com/business-travel/2022
8.	Jun 28, 2022	Phillips 66		IAG Cargo	1	1	https://www.aviationpros.com/ground-handling/fuel-di
9.	Jun 21, 2022	Gevo		Finnair	132.5	5	https://www.bakersfield.com/ap/hews/finnair-and-gevo

#### Summary per fuel producer

	Fuel producer	Total offtake volume (million liters) *	Number of offtake agreements
1.	Gevo	8,887.59	10
2.	Fulcrum	6,719.1	3
3.	Alder Fuels	5,678.12	1
4.	Shell	2,248.53	1
5.	DG fuels	1,457.38	1
6.	Aemetis	1,214.9	B
7.	Dimensional Energy	1,135.62	1
8.	Velocys	1,105.34	2
9.	ECB Group	1,050.08	2
10.	Neste	1,036.41	12
11.	OMV Grand total	1,001.32	2 <b>75</b>
			1-28/28 < >

#### Summary per fuel purchaser

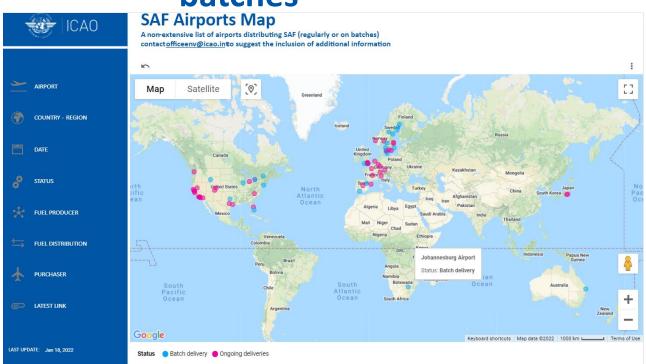
	Fuel purchaser	Total offtake volume (million liters) •	Number of offtake agreements
1.	United Airlines	10,513.98	6
2.	Delta	3,824.4	7
3.	OneWorld	3,785.41	1
4.	Lufthansa Group	3,247.98	2
5.	American Airlines	2,388.59	4
6.	AirBP	2,192.71	2
7.	Cathay Pacific	1,419.53	1
8.	KLM	937.04	4
9.	Southwest Airlines	829	1
10.	DHL Express	798.72	1
11.	Shell	750.08	1
	Grand total	34,177.01	75
			1-47/47 < >

1-75/75 < >

#### Airports tracker



Tracker of airports offering Sustainable Aviation Fuels, either continuously or in batches



	Date ▼	Airport	Status	Source
1.	3 févr. 2023	Dubai Airport	Batch delivery	https://news.gtp.gr
2.	9 janv. 2023	Toulon Hyères Airport	Ongoing deliveries	https://www.airport
3.	1 janv. 2023	Brussels Airport	Batch delivery	https://www.aviatio
4.	31 déc. 2022	Liege Airport	Batch delivery	https://biofuels-ne
5.	14 déc. 2022	Billund Airport	Ongoing deliveries	https://biofuelscent
6.	1 déc. 2022	kota kinabalu airport	Batch delivery	https://www.thestar
7.	25 nov. 2022	Ningbo Lishe International Airport	Ongoing deliveries	https://simpleflying
8.	24 oct. 2022	Lisbon Airport	Batch delivery	https://www.aviacio
				1-96/96 < >



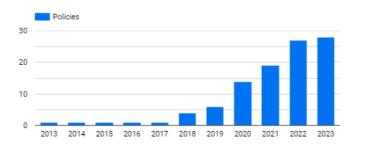
#### **SAF Policies tracker**



Tracker of Policies adopted or under development to foster SAF development

# Environmental Policies on Aviation Fuels The following map and table provides a summary of the policies (adopted and under development) to foster the use of Sustainable Aviation Fuels and Lower Carbon Aviation Fuels. Map Satellite Was Satellite FOUCY TITLE POLICY TITLE POLICY TITLE POLICY TYPE FOUCY TITLE FOUCY TYPE FOUCY DESCRIPTION Four Traising Four Tr

Date +	State	Policy Title	Policy Description	Status	Source
13 févr. 2023	United States	Invest in Illinois Act	This legislation in Illinois provides a tax credit of \$1.50 per gallon for SAF used by aircraft in the state. For the SAF to qualify for the credit, it must reduce carbon emissions by at least 50% throughout its life. The credit applies to all SAF used in Illinois, regardless of where it is produced. However, credits for SAF used before June 1, 2028, must come from renewable sources such as biomass, waste streams, renewable energy, or gaseous carbon oxides. The tax credit will be available until January 1, 2033.	adopted	https://www sustainable
16 nov. 2022	India		SAF mandate blending under consideration	under development	https://www committed-
18 oct. 2022	Japan		The Japanese government is seeking public comments on a draft policy to promote decarbonization in the aviation industry. The policy, in part, would require flights to be carbon neutral by 2050 and require airlines to use sustainable aviation fuel (SAF).	under development	https://biom s-draft-polic
3 oct. 2022	China	China Civil Aviation Green Development Policy and Action	Target of 50k tons of SAF use by 2025 SAF performance testing, airworthiness certification, exploration of new paths for its development.	adopted	http://www. 15425.html
16 août 2022	United States	Inflation Reduction Act ( SAF blenders tax credit)	The bill provides a \$1.25 per-gallon credit for each gallon of SAF sold as part of a qualified fuel mixture, including that it has a demonstrated lifecycle greenhouse gas (GHG) reduction of at least 50 percent compared to conventional jet fuel. The credit, available for two years beginning January 1, increases up to \$1.75 per gallon on a Siding scale based on the percentage of lifecycle GHG emissions reduced beyond 50 percent. Beginning in 2025, SAF would be eligible for credits up to \$1.75 per gallon under a new Clean Fuel Production Credit (CFPC). That credit is set to expire at the end of 2027.	adopted	https://www aviation/202
19 juil. 2022	United Kingdom	Jet Zero Strategy	Increasing support for sustainable aviation fuels (SAF), by creating secure and growing UK SAF demand through a SAF mandate that will require at least 10% of jet fuel to be made from sustainable sources by 2030 and kickstarting a domestic	adopted	https://www sets-out-stra free-flying



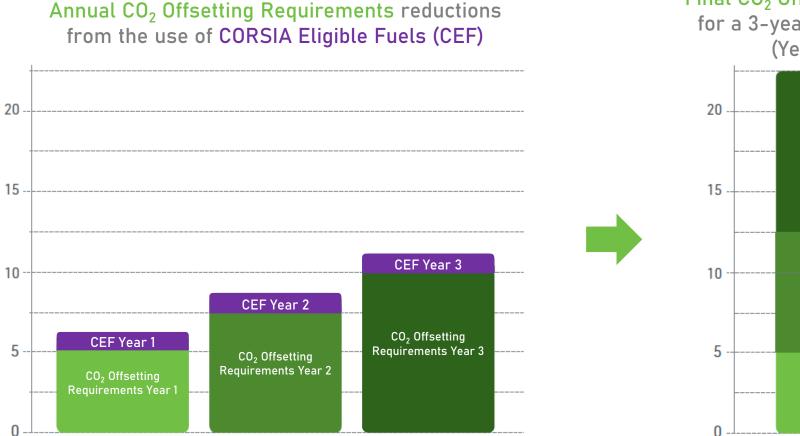
# III - Monitoring and reporting for cleaner energy

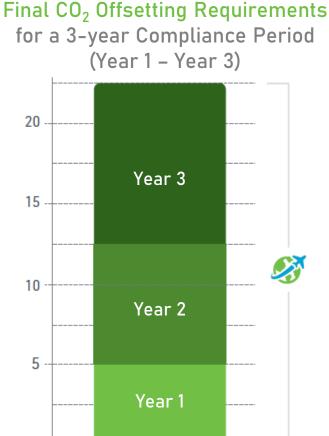
CORSIA MRV and emerging SAF reporting and accounting systems



#### **CORSIA** eligible Fuels (CEF) and MRV

#### Aeroplane operators can reduce CORSIA offsetting requirements with the use of CORSIA Eligible Fuels (CEF)

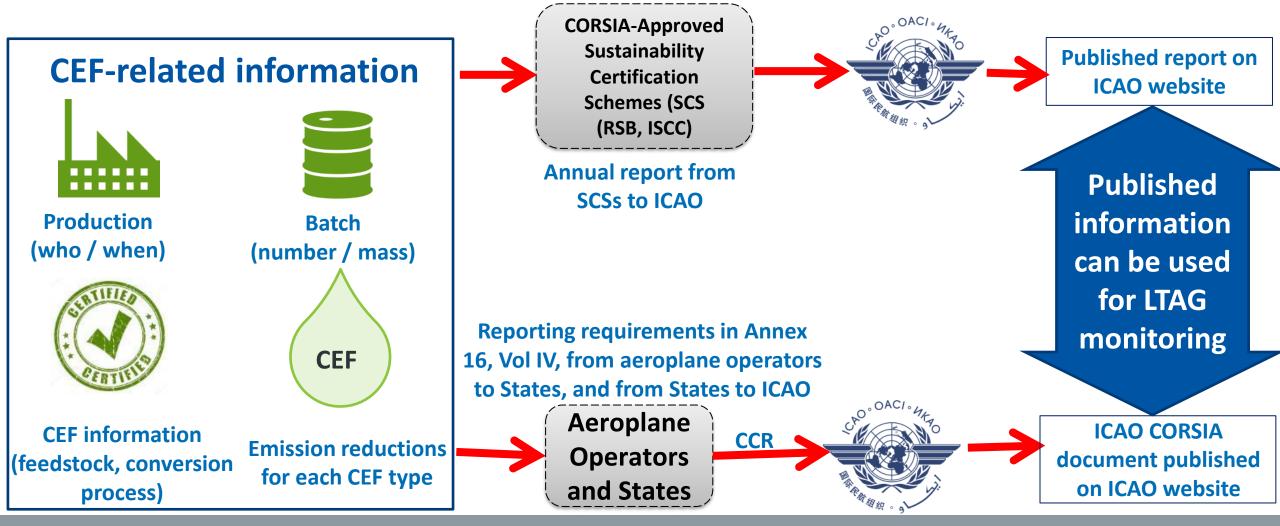




To allow that, CORSIA includes requirements for Monitoring, Reporting and Verification (MRV) of CEF claims

#### **CEF** reporting to ICAO under CORSIA

#### CEF information will be reported to ICAO and published





#### **Emerging SAF B&C Initiatives**

- Various aviation stakeholders are developing SAF Reporting and Accounting Initiatives (e.g. book & claim systems).
- In common, these initiatives intend to cover Scope 3 emissions from aviation end-users (corporate, business and individual travel).
- Different elements are being covered by each SAF Book & Claim initiative.
- These initiatives are in various levels of implementation.
- Conceptualization/Under design
  Publication/Implementation

Organization	Guidance/Methodology	Registry*	Verification
Aireg <sup>[8]</sup>	Х		
CST <sup>[7,9]</sup>	Х		
EDF <sup>[10]</sup>	Х		
SABA <sup>[11]</sup>	Х		
SBTi <sup>[12]</sup>	Х		
SFC and MIT <sup>[13]</sup>	X		
4AIR <sup>[14]</sup>		Х	
Airline's Programs <sup>[15]</sup>		Х	
Avelia <sup>[16]</sup>		Х	
Board Now <sup>[17]</sup>		Х	
FBO <sup>[18]</sup>		Х	
COSAFA <sup>[19]</sup>	X		Х
ISCC <sup>[20]</sup>	Х	Х	Х
RSB <sup>[6,21]</sup>	X	Х	Х

<sup>\*</sup>Registry designation on this table does not include all the qualities required in advance Book & Claim Systems (e.g., RNG, green electricity)

#### **Book and Claim description**

Book & Claim is a chain of custody method that tracks flow of a physical product and environmental attributes through transactions.

#### **Benefits**

- Operators with and without access to the actual SAF molecules may have facilitated access to SAF benefits.
- Expands the potential market for SAF producers.
- Facilitates logistical efficiency for reducing cost and emissions.

#### Challenges

- Definition and widespread use of a protocol for emission reporting.
- Entity/Location to host a registry.
- Geographically dependent incentive, regulatory, and/or accounting of the fuel booking vs sustainability certification claim.
- Potential overlap when complying with different schemes.

#### **CORSIA** and Book & Claim

- After the SAF is blended, CORSIA MRV already includes some elements of a book and claim chain of custody:
  - Claims of emissions reductions are based on purchasing and blending records.
  - CORSIA MRV includes detailed methodologies, registry (CORSIA CCR), and verification aspects.
- However, there are also differences between CORSIA and other book and claim systems.
  - CEF claims are connected to the USE<sup>1</sup> and OWNERSHIP<sup>2</sup> of the CEF
  - CORSIA does not address Scope 3 emissions
- Work is ongoing to discuss and potentially address these differences.

<sup>1 –</sup> Annex 16, Vol IV, 2.2.4.1 The aeroplane operator that intends to claim for emissions reductions from the use of CORSIA eligible fuels shall....

<sup>2 –</sup> Annex 16 Vol IV, 2.3.3.1 The aeroplane operator shall **subtract CORSIA eligible fuels traded or sold to a third party** from its total reported quantity of CORSIA eligible fuels.

#### CAEP will initiate technical work on LTAG Monitoring

- ✓ scoping study of the requirements, approaches, data sources, reporting and methodologies
- ✓ Development of the LTAG Monitoring Methodology
- Secretariat will work on the ICAO SAF Monitoring and Accounting platform
  - ✓ Monitor progress on SAF implementation (Assembly Resolution A41-21)
  - ✓ Consolidate available information (e.g. Book and Claim systems; CORSIA CCR public information, State Action Plans).

- There is a need for effective policies to address a number of challenges on cleaner energies (specific to each State)
- ICAO guidance provides information on various policy options
- Information is also available on CO<sub>2</sub> abatement cost (SAF Rules of Thumb \$ per CO2 reduction) to inform plans/projects and decision-makers.
- State Action Plans have an important role, including information on cleaner energy initiatives at national/regional levels
- ICAO Stocktaking and tracker tools are monitoring progress towards LTAG
- CORSIA MRV will also provide useful information on SAF/LCAF monitoring
- Efforts are ongoing for an ICAO globally harmonized methodology for fuel accounting and reporting

### VII. Guiding questions for dialogue



**Policies** 

What do you see as the key challenges for your State on the development of cleaner energy and its deployment (including sustainability, certification, scale-up production, distribution, access/utilization)?



Can you share your State/Organization's experience on the development of policies to foster the development and deployment of SAF, LCAF and other cleaner energy?

Please describe how the policy works and any successes/lessons learnt.



## VII. Guiding questions for dialogue

Monitoring and reporting





#### **ENVIRONMENT Dialogue Session - Monitoring and reporting**

Can you share your **State/Organization's experience** on the collecting and reporting of data and information on SAF, LCAF and other cleaner energy in your State Action Plans? How can the ICAO guidance and tools help?





#### CAO ENVIRONMENT Dialogue Session - Monitoring and reporting

In your view, what is the ICAO's role regarding the accounting and reporting system of SAF, LCAF and other cleaner energy in future?



