

Swiss Confederation



ICAO State Action Plan on CO<sub>2</sub> Emission Reduction of Switzerland

June 2025

Federal Office of Civil Aviation (FOCA)

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#### **I** Introduction

- a) The ICAO Contracting State Switzerland is a member of the European free trade association EFTA and of the European Civil Aviation Conference (ECAC). ECAC is an intergovernmental organisation covering the widest grouping of Member States<sup>1</sup> of any European organisation dealing with civil aviation. It is currently composed of 44 Member States, and was created in 1955.
- b) ECAC States share the view that the environmental impacts of the aviation sector must be mitigated, if aviation is to continue to be successful as an important facilitator of economic growth and prosperity, being an urgent need to achieve the ICAO long-term aspirational goal (LTAG) for international aviation of net-zero carbon emissions by 2050, and to strive for further emissions reductions. Together, they fully support ICAO's on-going efforts to address the full range of those impacts, including the key strategic challenge posed by climate change, for the sustainable development of international air transport.
- c) All ECAC States, in application of their commitment in the 2016 Bratislava Declaration, support CORSIA implementation and have notified ICAO of their decision to voluntarily participate in CORSIA from the start of its pilot phase and have effectively engaged in its implementation.
- d) Switzerland, like all of ECAC's 44 States, is fully committed to and involved in the fight against climate change and works towards a resource-efficient, competitive and sustainable multimodal transport system.
- e) Switzerland recognises the value of each State preparing and submitting to ICAO an updated State Action Plan for CO<sub>2</sub> emissions reductions as an important step towards the achievement of the global collective goals agreed since the 38th Session of the ICAO Assembly in 2013 and the monitoring of the long-term aspirational goal agreed at Assembly 41.
- f) In that context, it is the intention that all ECAC States submit to ICAO an Action Plan<sup>2</sup>. This is the State Action Plan of Switzerland.
- g) Switzerland strongly supports the ICAO basket of measures as the key means to achieve ICAO's LTAG target and shares the view of all ECAC States that a comprehensive approach to reducing aviation CO<sub>2</sub> emissions is necessary, and that this should include:
  - i. emission reductions at source, including European support to CAEP work in this matter (standard setting process);
  - ii. research and development on emission reductions technologies, including public-private partnerships;
  - iii. development and deployment of sustainable aviation fuels, including research and operational initiatives undertaken jointly with stakeholders to meet the ICAO aspirational vision of reducing CO<sub>2</sub> emissions by 5% by 2030 through increased use of SAF worldwide;
  - iv. improvement and optimisation of Air Traffic Management and infrastructure use within Europe, in particular through the Single European Sky ATM Research (SESAR), and also beyond European borders through participation in international cooperation initiatives; and
  - v. Market Based Measures, which allow the sector to continue to grow in a sustainable and efficient manner, recognizing that the measures at (i) to (iv) above cannot, even in aggregate, deliver in time the emissions reductions necessary to meet the ICAO long term aspirational goal of net-zero carbon emissions by 2050.

<sup>&</sup>lt;sup>1</sup> Albania, Armenia, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Moldova, Monaco, Montenegro, Netherlands, North Macedonia, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine, and the United Kingdom.

 $<sup>^2</sup>$  ICAO Assembly Resolution A41-21 also encourages States to submit an annual reporting of international aviation CO $_2$  emissions, which is a task different in nature and purpose to that of action plans, strategic in their nature. Also, this require ment is subject to different deadlines for submission and updates as annual updates are expected. For that reason, the reporting to ICAO of international aviation CO $_2$  emissions referred to in paragraphs 15 of ICAO Resolution A41-21 is not necessarily part of this Action Plan, and may be provided separately, as part of routine provision of data to ICAO, or in future updates of this action plan.

- h) In Europe, many of the actions which are undertaken within the framework of this comprehensive approach are in practice taken collectively, including many led by the European Union. They are reported in Section VI of this State Action Plan, where the involvement of Switzerland is described, as well as that of other stakeholders.
- i) In Switzerland a number of actions are undertaken at the national level, including those by stakeholders. These national actions are reported in Section VII of this Plan.
- j) In relation to European actions, it is important to note that:
  - i. The extent of participation will vary from one State to another, reflecting the priorities and circumstances of each State (economic situation, size of its aviation market, historical and institutional context, such as EU/non-EU). The ECAC States are thus involved in different degrees and on different timelines in the delivery of these common actions. When an additional State joins a collective action, including at a later stage, this broad ensithe effect of the measure, thus increasing the European contribution to meeting the global goals.
  - ii. Acting together, the ECAC States have undertaken measures to reduce the region's emissions through a comprehensive approach. Some of the measures, although implemented by some, but not all of ECAC's 44 States, nonetheless yield emission reduction benefits across the whole of the region (for example research, SAF promotion or ETS).

# **II Executive Summary**

Switzerland is fully committed to and involved in the fight against climate change, and works towards a resource-efficient, competitive and sustainable multimodal transport system.

FOCA as the national regulator oversees civil aviation in Switzerland, ensuring safety, sustainability, and regulatory compliance. FOCA supervises aviation companies, certifies personnel and aircraft, and contributes to aviation policy and international cooperation.

Swiss civil aviation has a high safety standard and at the same time pursues a sustainable development strategy.

Switzerland, as all States of the European Civil Aviation Conference (ECAC), shares the view that the environmental impacts of the aviation sector must be mitigated, if aviation is to continue to be successful as an important facilitator of economic growth and prosperity, being an urgent need to achieve the ICAO long-term aspirational goal (LTAG) for international aviation of net-zero carbon emissions by 2050, and to strive for further emissions reductions. Additionally, under the Climate and Innovation Act (KIG), Switzerland aims to reach net-zero greenhouse gas emissions by 2050, including air traffic.

The State Action Plan of Switzerland is divided into the following sections: It begins with a general introduction, followed by a description of the framework conditions for civil aviation in Switzerland, as well as information on historical emissions and a traffic outlook. At the heart of the State Action Plan are the measures taken at supranational and national level to reduce  $CO_2$  emissions. In this context, the action plan also provides a forecast of the estimated benefits of the measures implemented in the sector.

The supranational European Section of this action plan, which is common to all European State Action Plans, presents a updated description and assessment of the collective European efforts taken to mitigate the climate impacts of aviation, as well as the description of future measures driving to additional  $CO_2$  savings.

On the national level FOCA evaluated possible measures to reduce  $CO_2$  emissions in collaboration with stakeholders of aerodromes, air traffic control and aviation industry. Most of those measures are done on a voluntary base and are mostly also targeted at optimising operations and business. The quantification of these measures is only possible with limitations. Nonetheless the results show the willingness and effort of the civil aviation sector to reduce  $CO_2$  emissions.

This State Action Plan was finalised in June 2025 and shall be considered as subject to updating after that date.

#### III Current State of Aviation in Switzerland

#### 3.1 Legal basis

The primary aviation legislation of Switzerland is the Federal Aviation Act (LCA.SR 748.0)<sup>3</sup>, promulgated by the National Assembly in 1948. The Federal Aviation Act, which has been updated several times, contains general rules which are the basic laws applicable to civil aviation. The last amendment to the Federal Aviation Act came into force on 1<sup>st</sup> January 2025. Based on the Act regulations are implemented in different domains such as infrastructure, airworthiness, air traffic regulations, operating rules, air transport and many more.

A detailed analysis of the primary aviation legislation was published in December 2010 in the final report on the safety oversight audit of the civil aviation system of Switzerland, ICAO Universal Safety Oversight Audit Programme<sup>4</sup>.

Recognizing the integrated character of international civil aviation and desiring that intra-European air transport be harmonized, Switzerland ratified the Convention on International Civil Aviation on 6 February 1947 and at the European level an Agreement with the European Community on 21 June 1999 (Ref. 0.748.127.192.68) setting out rules for the Contracting Parties in the field of civil aviation.

To fully harmonize the legal system of Switzerland and the EU, the Agreement contains an Annex with all European Community legislation regarding civil aviation to be fully applicable in Switzerland.

Since 1st December 2006 Switzerland participates in the European Aviation Safety Agency (EASA). Switzerland's active role within the EASA system ensures recognition of the Swiss civil aviation sector in the European market. Switzerland has the same rights and obligations as other EASA member states, except for the right to vote in the management board of EASA. Through the bilateral agreement on air transport between Switzerland and the European Union, Switzerland adopts current and future EU legislation on civil aviation safety<sup>5</sup>.

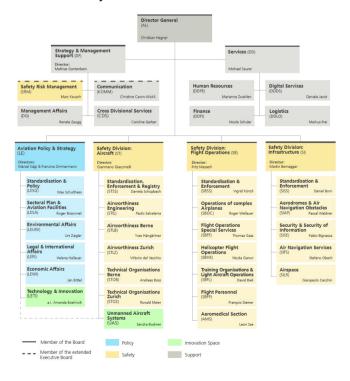


Figure 3.1.1 Organisation chart FOCA as of June 2025

©FOCA

<sup>&</sup>lt;sup>3</sup> Federal Aviation Act (SR 748.0) 2021: Bundesgesetz vom 21. Dezember 1948 über die Luftfahrt

<sup>&</sup>lt;sup>4</sup> ICAO Universal Safety Oversight Audit Programme ICAO USOAP 2010: Final Report

<sup>&</sup>lt;sup>5</sup> FOCA website 2025: EASA

The Federal Office of Civil Aviation (FOCA) is responsible for monitoring the status and development of civil aviation in Switzerland. It is responsible for ensuring that civil aviation in Switzerland has a high safety standard and one that it is in keeping with sustainable development. The FOCA aims to ensure the safe, best possible and environmentally friendly use of the infrastructure, which includes airspace, air traffic control and aerodromes. The Federal Office also supervises aviation companies to which it issues an operating licence based on a technical, operational and financial evaluation.

As far as aviation personnel are concerned, the FOCA ensures that pilots, air traffic controllers and maintenance specialists receive the most comprehensive and up-to-date training or in-service training available. The FOCA inspects the technical requirements with which aircraft, from hot air balloons through gliders to wide-bodied aircraft, need to comply for safe operation.

The FOCA bases itself mainly on internationally agreed standards and practices for its supervisory activities.

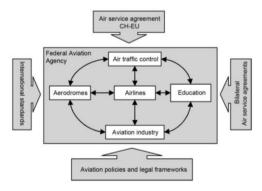
In addition to the supervisory function in the four areas mentioned, which comprises a considerable part of its work, the FOCA is responsible for the formulation and implementation of aviation policy decisions. The Federal Office is also involved in various international organisations or collaborates closely with them.

#### 3.2 Aviation Policy in Switzerland

Aviation policy is designed to set the framework for the development of civil aviation in Switzerland. It is oriented around the Federal Council's strategy of sustainability and considers the economic, environmental and social dimensions of sustainability. The main aim of aviation policy is to ensure that Switzerland has optimal connections to all Major European and global centres.

The aviation policy report published at the end of 2004 marked the first time in fifty years that the Federal Council had conducted a situation appraisal of civil aviation in Switzerland. While this previous report, was prepared in the wake of the Swissair crisis and serious aviation accidents, the new report does not represent a departure from the existing policy but rather sets out to explain how civil aviation can be further developed against a backdrop of increasing demand for mobility, the appearance of new airlines and the development of new technologies. The Federal Council formally adopted the report on 25 February 2016<sup>6</sup>. In it, the government expresses its desire for the sustainable development of aviation and to strive to ensure the highest safety standards that can be measured amongst the best in Europe. The aviation policy report is currently being revised and will be adopted in 2027, according to the current state of planning.

Based on the superior strategies of the aviation policy the Federal Council defines the guiding principles in the sectors of Aerodromes, Air traffic control, Aviation industry and Education. Those sectors have to be considered as a whole system and are strongly linked. The state has the role of the regulator.



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Figure 3.2.1 Civil Aviation in Switzerland

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<sup>&</sup>lt;sup>6</sup> Aviation Policy Report 2016

The Sectoral Aviation Infrastructure Plan (SAIP)<sup>7</sup> is the Federal government's planning and coordination instrument for civil aviation. It sets out the purpose, required perimeter, main aspects of use, equipment and general operating conditions for every aerodrome. The SAIP forms the basis for the planning, construction and operation of an aerodrome, in particular for concessions and operating regulations.

#### 3.3 Sustainability

The Swiss Confederation published in 2015 an updated assessment of the sustainability based on three main sustainability dimensions: the economy, the environment and society of civil aviation in Switzerland<sup>8</sup>. A short summary of this report is presented in the State Action Plan of Switzerland. The impact of the COVID-19 pandemic is not reflected in the report, and therefore the results may not be valid for 2020 and onwards.

With respect to the economic dimension, the trends may largely be regarded as positive. The main challenges concern capacity restrictions at the national airports and maintaining the competitiveness of Switzerland's civil aviation sector, both of which have an influence on the country's degree of attractiveness as a small, open economy.

With regard to the environment dimension, despite the fact that improvements have been made in the past few years, deficits continue to exist, primarily relating to noise and impacts on the climate. However, the fact that these environmental impacts have not increased at the same rate as the passenger transport may be regarded as a positive trend. As a consequence of two regulatory amendments in the revised Federal Noise Abatement Ordinance that entered into force on 1<sup>st</sup> February 2015, there is a tendency for more people to be exposed to aircraft noise in residential zones.

In the social dimension, the assessment is mixed: while the safety and security situation has improved, there are still some deficits regarding public health and the options for residential development in the vicinity of the national airports.

With its 2030 Sustainable Development Strategy (SDS)<sup>9</sup>, the Federal Council is setting out how it intends to implement the 2030 Agenda for Sustainable Development over the next five years. The strategy defines priorities in those policy areas in which there is a particular need for action and coordination between policy areas at federal level to implement the 2030 Agenda.

The associated 2024-2027 Action Plan adopted by the Federal Council on 24<sup>th</sup> January 2024 contains 22 measures in the priority areas of the 2030 SDS. The development of a strategy for the development, promotion and use of sustainable aviation fuels was part of the previous action plan 2021-2023. This FOCA's strategy report on fostering the development and uptake of SAF¹0 acknowledges the importance of SAFs for achieving the climate objectives in air transport: the use of SAFs is one of the most promising approaches to reducing aviation's impact on our climate. In addition to fossil CO₂ emissions, this will also reduce non-CO₂ emissions. SAFs can already be used with the aircraft and aircraft fuelling infrastructure we use today. The report shows how the development and use of SAFs can be promoted in Switzerland (see chapter 7.2 for more information).

According to the Climate and Innovation Act (KIG)<sup>11</sup>, greenhouse gas emissions caused by humans in Switzerland should be reduced to zero by 2050 (net zero target). This target also applies to international and domestic aviation in Switzerland. Measures to achieve these targets are to be laid down in the CO<sub>2</sub> Act. The current version of the CO<sub>2</sub> Act<sup>12</sup> regulates four aviation-related topics: the implementation of the Swiss ETS, the introduction and implementation of a new aviation and climate funding programme, the obligation of a blending mandate and the inclusion of information on climate-relevant

<sup>&</sup>lt;sup>7</sup> Sectoral Aviation Infrastructure Plan (SAIP)

<sup>8</sup> Civil Aviation and sustainability, Update 2015

<sup>9</sup> Sustainable Development Strategy

<sup>&</sup>lt;sup>10</sup> Sustainable aviation fuels

<sup>11</sup> Climate and Innovation Act SR 814.310 - Bundesgesetz vom 30. September 2022... | Fedlex

<sup>12</sup> CO<sub>2</sub> Act SR 641.71 - Federal Act of 23 December 2011 on t... | Fedlex

emissions in the offers of flight providers.

In its report  $CO_2$ -neutral flying by  $2050^{13}$ , the Federal Council outlines the measures required to achieve the above-mentioned net-zero greenhouse gas emissions goal by 2050. In addition to improved aircraft technology and operational improvements, the use of sustainable aviation fuels (SAF) as drop-in fuels is the most important technical measure for reducing fossil  $CO_2$  emissions in air traffic.

#### 3.4 Structure of the Civil Aviation Sector

The Swiss civil aerodromes are structured in 6 different categories<sup>14</sup>: national airport (3), regional airport (11), airfield (45), heliport (24) and mountain landing site (40).

Switzerland has three national airports: Zurich, Geneva and Basel-Mulhouse. They are the principal landing sites for international air traffic and are important for the national and international traffic system in Switzerland. Their function is to achieve optimal connections to all Major European and global centres. Their remaining capacity can be used by any other national or international registered aircraft.

Apart from the national airports, there are 11 regional airports (Bern-Belp, Lugano-Agno, Sion, St. Gallen-Alternrhein, Birrfeld, Bressaucourt, Ecuvillens, Grechen, La Chaux-de-Fons-Les Eplatures, Lausanne-La Blécherette, Samedan). Regional airports are aerodromes with a concession (except St. Gallen-Altenrhein), for public use and they have a customs clearance. The technical standard is higher than at an airfield. The regional airports manly complement the national airports for the scheduled flights. They create direct connections between Switzerland and the foreign country. Besides that, they are a regional centre for business, touristic, commercial and training flights. The airfields are primary for private use and training flights. Figure 3.4.1 and Figure 3.4.2 are giving an overview of the Swiss national and regional airports, as well as airfields and heliports.

Civil aerodromes: overview 2023

Foundation Longest Paved Instrument runway runways Flight Rules (concrete/ (IFR) asphalt) Procedures Metres Number (yes/no) Total airports and airfields with paved runways 38 Total national airports 6 Zurich 1948 3 700 3 yes 3 900 Geneva 1922 yes Basel-Mulhouse 1946 3 900 yes Total regional airports 11 Bern-Belp 1929 1 730 yes Lugano-Agno 1947 1 415 yes 1935 2 000 Sion St.Gallen-Altenrhein 1926 1 455 Birrfeld 1937 718 Bressaucourt 2011 800 Écuvillens 1953 800 Grenchen 1931 1 000 yes La Chaux-de-Fonds-Les Éplatures 1912 1 090 1 yes Lausanne-La Blécherette 1910 875 no Samedan 1937 1 840 no Total airfields with 21 paved runways revised Source: FSO, FOCA - Civil aviation statistics (AVIA\_ZL) © FSO 2024

Figure 3.4.1 Civil aerodromes: overview 2023

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<sup>13</sup> CO<sub>2</sub> neutrales Fliegen bis 2050: news.admin.ch/en/nsb?id=100108

<sup>&</sup>lt;sup>14</sup> Sectoral Aviation Infrastructure Plan (SAIP)

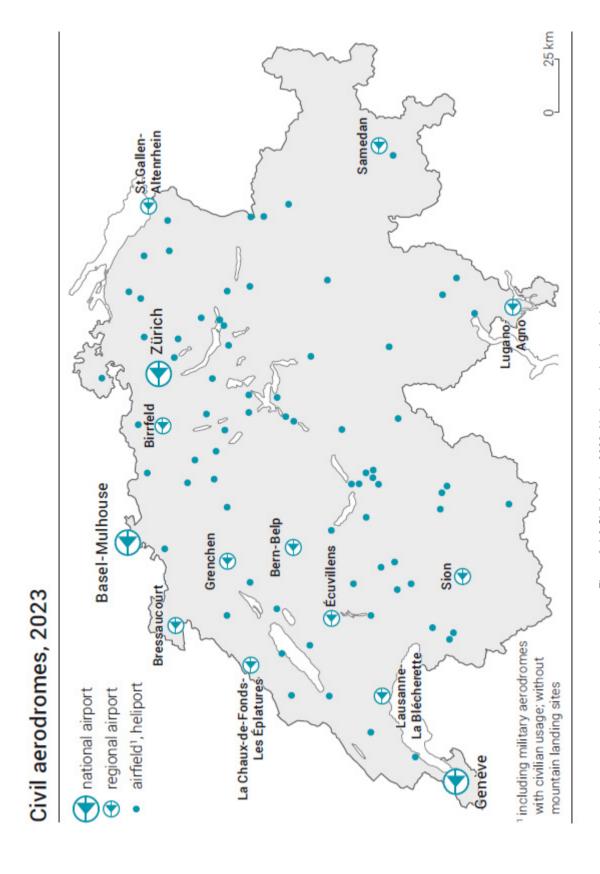
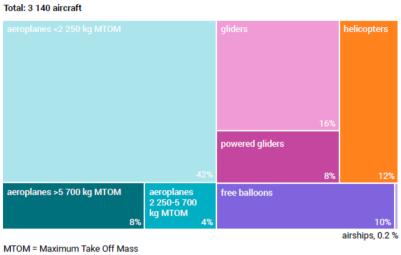


Figure 3.4.2 Civil Aviation 2023; National and regional airports

#### 3.5 Swiss Aircraft Register

The Swiss Aircraft Registry shows all records of Swiss registered aircraft. It contains detailed information regarding owner and holder, type of aircraft, its year of construction, serial number and Maximum take-off Mass. The registry is managed by FOCA and published on the website of FOCA<sup>15</sup>.

#### Breakdown of registered aircraft in Switzerland, 2023



Data as on: 31.12.2023 Source: FSO, FOCA — Civil aviation statistics (AVIA\_ZL) gr-e-11.03.02-01 © FSO 2024

#### Registered aircraft in Switzerland

	1990	2000	2010	2019	2022	2023
Total aircraft	3 653	4 048	3 705	3 211	3 134	3 140
Total aeroplanes	1 952	2 014	1 913	1 730	1 702	1 699
< 2 250 kg MTOM		1 572	1 413	1 324	1 304	1 317
2 250-5 700 kg MTOM		157	197	146	144	128
> 5 700 kg MTOM		285	303	260	254	254
Helicopters	199	254	327	345	354	365
Gliders	1 035	1 024	824	579	524	514
Powered gliders	131	246	251	241	238	241
Airships	1	6	9	8	7	7
Free balloons	335	504	381	308	309	314
MTOM = Maximum Take Off Mass						

Figure 3.5.1 Swiss Aircraft Register 2023, Aircraft

## 3.6 Operations

A pilot, whether of aeroplanes, sailplanes, helicopters or balloons, has to complete a clearly defined training. This includes theory lessons as well as practical training on the aircraft concerned. The training is completed with an examination. After basic training, pilots can undergo further training to become an instructor, commercial pilot or airline pilot. Licences are issued according to EASA and thus ICAO regulations <sup>16</sup>.

<sup>&</sup>lt;sup>15</sup> Swiss Aircraft Registry

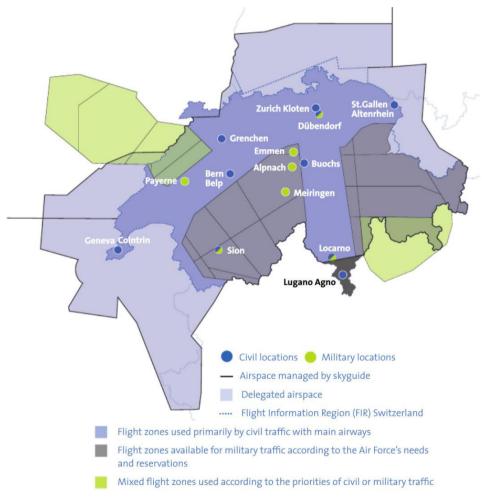
<sup>&</sup>lt;sup>16</sup> Flight Training, Legislation and Directives

Aviation operators are required to hold an Air Operator Certificate (AOC), and as a rule also have to possess an operating license to fly in Switzerland. The practices are based on the recommendations of ICAO and EASA.

The Swiss civil and military airspace is managed by Skyguide<sup>17</sup>, which performs its services under a legal mandate issued by the Swiss Confederation and the FOCA. This mandate requires Skyguide to ensure the safe, fluid and cost-effective management of air traffic in Swiss airspace and in the adjacent airspace of neighbouring countries that has been delegated to its control. Skyguide's legally-prescribed duties and tasks entail providing civil and military air navigation services, aeronautical information and telecommunications services and the technical services required to install, operate and maintain the associated air navigation systems and facilities.

Skyguide has its head office in Geneva and maintains further operations in Alpnach, Bern-Belp, Buochs, Dübendorf, Emmen, Grenchen, Locarno, Lugano Agno, Meiringen, Payerne, St. Gallen-Altenrhein, Sion and Zurich. Furthermore, Skyguide ensure the maintenance of 240 installations throughout the country.

Skyguide is an active member of Functional Airspace Block Europe Central (FABEC) and works closely with ICAO, Eurocontrol and CANSO.



© Skyguide

Figure 3.6.1 Skyguide's airspace, Annual Report 2019

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<sup>&</sup>lt;sup>17</sup> Skyquide

Similar to the register of aircraft published by FOCA, the Federal Office of Statistics publishes yearly an overview of Swiss aviation companies.

# Swiss aviation companies

	1990	2000	2010	2019	2022	2023
Total companies	340	420	322	252	258	260
Companies with						
scheduled traffic	4	5	9	5	5	5
Other companies with						
commercial traffic	120	172	81	38	36	36
Maintenance companies	83	94	90	80	81	82
Flying schools	133	149	142	129	136	137

Source: FSO, FOCA - Civil aviation statistics (AVIA\_ZL)

2024

## Flight personnel

Licence holders

	1990	2000	2010	2019	2022	2023
Private pilots	8 179	6 792	5 581	4 422	4 423	4 354
Commercial pilots	1 526	1 421	952	1 096	1 076	1 039
Airline transport pilots	886	2 223	2 266	2 508	2 439	2 531
Multi-Crew pilots	0	0	46	22	15	17
Helicopter pilots <sup>1</sup>	779	1 036	1 168	1 072	1 167	1 172
Glider pilots	3 188	3 145	2 617	1 761	2 323	2 411
Free balloon pilots	360	449	340	211	200	199
Validations <sup>2</sup>	443	420	8	7	4	2
Flight engineers	217	14	2	0	0	0
Radio navigators	89	30	10	3	0	0

including Air Transport Pilot Licence ATPL (H)

Source: FSO, FOCA - Civil aviation statistics (AVIA\_ZL)

© FSO 2024

Figure 3.6.2 Swiss Companies, Flying Personnel (Licences) 2023

<sup>&</sup>lt;sup>2</sup> recognition of foreign licences (Validation)

#### 3.7 Traffic Performance

The number of scheduled and charter traffic movements is delivered monthly by the airport authority to FOCA. This information facilitates the organisation of airport operations in the areas of safety, dispatching and passenger information. The information is also used to calculate airport landing fees.

Figure 3.7.1 shows the movements of scheduled and charter traffic at the three national airports and at four regional airports until 2023. The share of scheduled and charter traffic operating through the regional airports (Bern-Belp, Lugano-Agno, Sion and St. Gallen-Altenrhein) is around 0.6 %. Just over 50% of all scheduled and charter departures and landings are at Zurich airport.

The curve of total scheduled and charter traffic shown in Figure 3.7.1 has a clear peak in 2000. From 1995 to 2000 the aircraft movements grew every year by about 5 to 7 %. After the year 2000, the civil aviation sector experienced a major crisis, which caused a continuous decrease in movements and, from 2004, a stagnation at a level of around 400 000 movements per year. From 2010 until 2019, there is a light increase in movements. Following the massive decrease of movements in 2020 due to the COVID-19 pandemic situation, numbers are rising and are likely to return to 2019 levels.

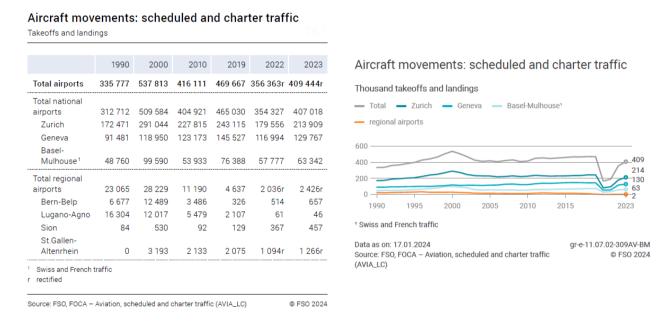


Figure 3.7.1 Scheduled and Charter Traffic; Aircraft Movements 2023

The situation is completely different at the regional airports. Here, growth occurred from 1980 to 1995, after which the level of scheduled and charter traffic is decreasing further. This decrease isn't a COVID-19 effect but due to less airlines operating from regional airports.

As with aircraft movements, the level of passenger movements is reported regularly to FOCA, with the information coming from ticket sales or directly from the airline company.

Figure 3.7.2 shows the total passenger numbers for scheduled and charter traffic. The passenger numbers increased in line with traffic increase until 2000, after which both traffic movements and passenger numbers decreased. After three to four years the market recovered and in 2007 the number of passengers was higher than in 2000. The 'dip' in 2009 was caused by the financial crisis. The effect of global passenger totals drop of more than 60% 18 is shown clearly in the following figures.

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<sup>18</sup> ICAO Newsroom

#### Air passengers: scheduled and charter traffic

Passengers<sup>1</sup> arriving and departing

	1990	2000	2010
Total airports	19 944 463	34 426 801	39 009 046
Zurich	12 278 088	22 450 494	22 854 358
Geneva	5 488 703	7 677 763	11 748 972
Basel-Mulhouse <sup>2</sup>	1 776 784	3 699 194	4 087 931
Bern-Belp	88 584	205 314	85 981
Lugano-Agno	310 240	286 507	159 497
Sion	2 064	8 760	3 912
St.Gallen-Altenrhein	0	98 769	68 395
	2019	2022	2023
Total airports	58 561 919	43 595 838r	53 321 819r
Zurich	31 478 748	22 512 400	28 842 554
Geneva	17 826 513	13 958 454	16 314 270
Basel-Mulhouse <sup>2</sup>	9 068 206	7 034 591	8 054 744
Bern-Belp	22 233	35 230	42 833
Lugano-Agno	56 201	588	368
Sion	2 381	4 180	5 373
St.Gallen-Altenrhein	107 637	50 395r	61 677r

- local and transfer passengers
- <sup>2</sup> Swiss and French traffic
- r rectified

Source: FSO, FOCA - Aviation, scheduled and charter traffic (AVIA\_LC)

© FSO 2024

# Air passengers: scheduled and charter traffic Million passengers¹ arriving and departing — Total — Zurich — Geneva — Basel-Mulhouse² — regional airports 60 40 20 1990 1995 2000 2005 2010 2015 2023 ¹ local and transfer passengers ² Swiss and French traffic Data as on: 17.01.2024 gre-11.07.02-309AV-P

Source: FSO. FOCA - Aviation, scheduled and charter traffic

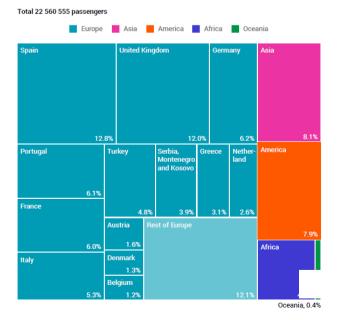
Figure 3.7.2 Total Passengers: Scheduled and Charter Traffic; Number of Passengers 2023

(AVIA\_LC)

Information from the tickets sold and from the airline companies gives data not only about the number of passengers at airports but also about the passengers' destination and departure point. In Figure 3.7.3 the main destinations of departing passengers for 2023 are shown. Some 79% are travelling from Switzerland to Europe, 8% to Asia, 8% to America, 4.5% to Africa and under 1% to Oceania.

#### Air passengers by final destination, 2023

Departing local passengers from Swiss airports in scheduled and charter traffic



Note: Only very partial data on passengers' final destinations has been available for the national airport of Basel-Mulhouse and the regional airports. Where data is incomplete, the flight destination (destination of the aircraft boarded by the passengers at the airports in question) has been substituted for the final destination. All figures according to the status of the databases on 17.01.2024. Minor subsequent adjustments cannot be excluded.

Data as on: 17.01.2024 gr-e-11.07.02-01a Source: FSO, FOCA — Aviation, scheduled and charter flights (AVIA\_LC) @ FSO 2024

Figure 3.7.3 Air Passengers by final destination 2023

© FSO 2024

#### IV Historical Emissions and Forecast

#### 4.1 Historical Emissions

Switzerland submits annually the fuel consumption and gaseous emissions under the UNFCCC on GHG emissions and removals<sup>19</sup>.

The emissions of civil aviation are modelled by a Tier 3a method developed by FOCA. The Tier 3a method follows standard modelling procedures at the level of single movements based on detailed movement statistics. The primary key for all calculations is the aircraft tail number, which allows calculation at the most precise level, namely on the level of the individual aircraft and engine type. Every aircraft is linked to the FOCA engine-data base containing emission factors for more than 600 individual engines with different power settings. Emissions in the landing and take-off cycle (LTO) are calculated with aircraft category-dependent flight times and corresponding power settings. Cruise emissions are calculated based on the individual aircraft type and the trip distance for every flight.

The movement database from Swiss airports contains departure and destination airport. With this information, all flights from and to Swiss airports are separated into domestic (national) and international flights prior to the emission calculation.

The emission factors used are either country-specific or taken from the ICAO engine emissions databank, from EMEP/CORINAIR databases (EMEP/EEA 2023), Swedish Defence Research Agency (FOI) and Swiss FOCA measurements (precursors). Cruise emission factors are generally calculated from the values of the ICAO engine emissions databank, adjusted to cruise conditions by using the Boeing Fuel Flow Method 2. For N<sub>2</sub>O, the IPCC default emission factor is used.

Since 2015, the statistics allowed to assign the individual helicopters to the helicopter companies. All emissions from helicopter flights without using an official airport or an official airfield are considered domestic emissions. These emissions are calculated based on operating time and not on number of movements. This allows a more precise estimation of fuel burn of helicopters.

Also in the year 2015 FOCA included a model to estimate Particulate Matter emissions from aircraft engines (Black Carbon and PM2.5/PM10).

In addition to the greenhouse gas CO<sub>2</sub>, parts of NOx and particulate emissions emitted at hight altitudes (typically >8000m above sea level) also have an impact on the climate. FOCA reports these climate-impacting pollutant emissions separately from 2020 onwards.

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<sup>&</sup>lt;sup>19</sup> Swiss Climate Reporting under the UNFCCC 1990-2023

#### Fuel consumption and main greenhouse gas and pollutant emissions from civil aviation

Including general aviation

	2000	2010	2019	2022	2023
Fuel consumption, in million	tonnes				
filled up in Switzerland	1.54	1.39	1.85	1.35	1.62
consumed in the Swiss					
airspace	0.51	0.58	0.62	0.49	0.52
Greenhouse gas emissions,	in million	tonnes²			
Carbon dioxide (CO <sub>2</sub> ) <sup>1</sup>	4.85	4.38	5.81	4.25	5.08
Pollutant emissions, in tonn	es²				
Nitrogen oxides (NOx)	18 470	17 635	28 368	23 777	29 014
of which impacting the climate <sup>3</sup>				17 521	21 544
Sulphur dioxide (SO <sub>2</sub> )	1 540	1 386	1 847	1 353	1 616
Volatile organic compounds (VOC)	905	734	810	443	464
Particulate emissions <sup>2</sup>					
Particulate matter (PM), in tonnes			44	57	65
Soot particles impacting the climate <sup>3</sup> , number		***		8.1*10 <sup>23</sup>	9.1*10 <sup>23</sup>

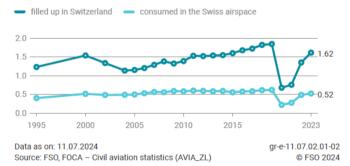
fossil CO2, i. e. without CO2 emissions from climate-neutral fuels

Source: FSO, FOCA - Civil aviation statistics (AVIA\_ZL)

#### Fuel consumption of civil aviation

#### Including general aviation

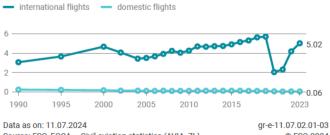
#### Million tonnes



#### CO2 emissions of civil aviation

#### Including general aviation





Source: FSO, FOCA - Civil aviation statistics (AVIA\_ZL)

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Figure 4.1.1 Fuel Consumption and Gaseous Emissions 2023

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International and domestic flights. The calculation is based on the fuel quantity actually filled up in Switzerland (sales principle).

emissions from a flight altitude higher than 8000 m above sea level

Activity data are derived from detailed movement statistics. The statistical basis has been extended after 1996; thus, the modelling details are not exactly the same for the years 1990-1995 as for the subsequent years. The source for the 1990 and 1995 modelling is the movement statistics, which record information for every movement on airline, number of seats, Swiss airport, arrival/departure, origin / destination, number of passengers, distance. From 1996 onwards, every movement in the FOCA statistics also contains the individual aircraft tail number (aircraft registration). This is the key variable to connect airport data and aircraft data. The statistics may contain more than one million records with individual tail numbers. All annual aircraft movements recorded are split into domestic and international flights.

Fuel Consuption and Gaseous Emissions of Swiss Civil Aviation

	Traffic	Fuel consumption [t]	Combustion	Gaseous P	ollutans				Particles				
		consumption [t]	CO <sub>2</sub> [t] <sup>1</sup>	NO <sub>X</sub> [t] Total	with impact on climate <sup>2</sup>	SO <sub>2</sub> [t]	VOC / COV [t]	CO [t]	PN [number Total	on climate <sup>2</sup>	PM [t] <sup>4</sup>	BC [t] 5	Pb [t]
2015	International Domestic Total	1 558 639 43 680 1 602 319	4 901 856 137 373 5 039 229	20 730 498 21 228		1 561 41 1 602	715 120 835	2 145			39 7 47	29 5 34	0.4 2.1 2.6
2016	International Domestic Total	1 634 318 44 716 1 679 034	5 139 864 140 629 5 280 493	23 039 560 23 599		1 637 42 1 679	704 103 807		 		39 7 46	5	0.3 2.0 2.3
2017	International Domestic Total	1 685 732 37 985 1 723 717	5 301 560 119 461 5 421 021	25 309 441 25 751		1 689 35 1 <b>72</b> 4	690 105 795				40 6 46	4	0.3 2.1 2.4
2018	International Domestic Total	1 787 356 36 561 1 823 917	5 621 163 114 984 5 736 147	27 665 412 28 076		1 790 34 1 825	703 109 812	1 683			40 6 46	29 5 34	0.3 2.0 2.3
2019	International Domestic Total	1 810 097 36 357 1 846 453	5 692 681 114 340 5 807 021	27 979 389 28 368		1 813 34 1 847	701 109 810	4 798 1 651 6 449			38 6 44	27 5 32	0.3 1.9 2.2
2020	International Domestic Total	652 644 24 449 677 093	2 052 539 76 891 2 129 430	11 884 269 12 153	0	654 22 676	170 104 274	1 843 1 698 3 541	6.51E+23 1.33E+23 7.84E+23	4.28E+23 0 4.28E+23	5	4	0.2 2.1 2
2021	International Domestic Total	737 786 18 763 756 549	2 318 448 59 010 2 377 458	13 355 196 13 551	0	739 17 756	199 89 288	2 145 1 484 3 629	7.65E+23 1.09E+23 8.74E+23	5.09E+23 0 5.09E+23	5	3	0.2 1.5 2
2022	International Domestic Total	1 330 995 21 845 1 352 840	4 185 927 68 700 4 254 628	23 551 226 23 777	0	1 333 20 1 353	348 95 443	3 783 1 365 5 148	1.23E+24 1.37E+23 1.36E+24	8.12E+23 0 8.12E+23	5		0.3 1.4 2
2023	International Domestic Total	1 594 895 20 530 1 615 425	5 015 881 64 566 5 080 447	28 796 218 29 014	0	1 597 19 1 616	376 87 464	4 219 1 346 5 565	1.36E+24 1.05E+23 1.47E+24	9.14E+23 0 9.14E+23	4	52 3 55	0.3 1.3 2

General > In addition to the greenhouse gas CO<sub>2</sub>, some NOx and particulate matter emissions also have an impact on the climate. These climate-impacting pollutant emissions information: will be reported separately from 2020 onwards.

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Figure 4.1.2 Fuel Consumption and Gaseous Emissions of Swiss Civil Aviation 2015-2023

<sup>&</sup>gt; Rounding differences possible

<sup>&</sup>lt;sup>1</sup>Fossil CO<sub>2</sub>, i.e. excluding CO<sub>2</sub> emissions from Sustainable Aviation Fuels

<sup>&</sup>lt;sup>2</sup> Emissions from an altitude of 8,000 meters above sea level

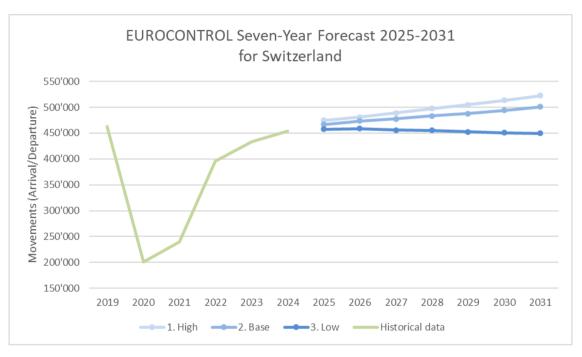
<sup>&</sup>lt;sup>3</sup> Number of soot particles emitted, a significant trigger for climate-impacting contrails and cirrus clouds

<sup>&</sup>lt;sup>4</sup> PM2.5 and PM10. Estimated values prior to 2020. Since 2020, particulate matter limits have applied to large aircraft engines; from that year onwards, the values reported are based on certification measurements.

<sup>&</sup>lt;sup>5</sup> Black Carbon. Estimated values prior to 2020. Since 2020, particulate matter limits have applied to large aircraft engines; from that year onwards, the values reported are based on certification measurements.

#### 4.2 Forecast

The most recent long-term development forecast for Swiss air traffic was published in 2015 (Intraplan 2015<sup>20</sup>). The results were included in the State Action Plan of Switzerland in 2018. For illustrative purposes and in the absence of a more recent forecast, a seven-year forecast, based on data published by EUROCONTROL Performance Review Unit, is included in this State Action Plan. Figure 4.2.1 shows the development of historic IFR movements in green and in different shades of blue three possible scenarios for future traffic for the next seven years.



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Figure 4.2.1 EUROCONTROL Seven-Year Forecast<sup>21</sup>

For more details on the three scenarios see EUROCONTROL traffic forecasts<sup>22</sup>. The seven-year forecast is not equal to a baseline scenario used in the context of the State Action Plan Initiative. Switzerland included no national baseline scenario in its State Action Plan, as Switzerland's reference scenario without measures is reflected in the ECAC baseline scenario up to 2050 in section 5.1.

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<sup>20</sup> Entwicklung des Luftverkehrs in der Schweiz bis 2030 - Nachfrageprognose 2015

<sup>&</sup>lt;sup>21</sup> The information does not necessarily reflect the official views or policy of EUROCONTROL, which makes no warranty, either implied or expressed, for the information contained in this document, including its accuracy, completeness or usefulness.

<sup>22</sup> https://ansperformance.eu/traffic/statfor/

# V ECAC Baseline Scenario and estimated Benefits of implemented Measures

The baseline scenario is intended to serve as a reference scenario for  $CO_2$  emissions of European aviation in the absence of any of the mitigation actions described later in this document. The following sets of data (2010, 2019, 2023) and forecasts (for 2030, 2040 and 2050) were provided by EURO-CONTROL for this purpose:

- European air traffic (includes all commercial and international flights departing from ECAC airports, in number of flights, revenue passenger kilometres (RPK) and revenue tonne-kilometres (RTK));
- its associated aggregated fuel consumption; and
- its associated CO<sub>2</sub> emissions.

The sets of forecasts correspond to projected traffic volumes in a 'Base' scenario, corresponding to the most-likely scenario, while corresponding fuel consumption and CO<sub>2</sub> emissions assume the technology level of the year 2023 (i.e. without considering reductions of emissions by further aircraft related technology improvements, improved ATM and operations, sustainable aviation fuels or market-based measures).

#### 5.1 ECAC Baseline Scenario

#### 5.1.1 Traffic Scenario "Base"

As in all forecasts produced by EUROCONTROL, various scenarios are built with a specific storyline and a mix of characteristics. The aim is to improve the understanding of factors that will influence future traffic growth and the risks that lie ahead. The latest EUROCONTROL Aviation Long-Term Outlook to 2050<sup>23</sup> has been published in 2024 and inspects traffic development in terms of Instrument Flight Rule (IFR) movements to 2050.

In the latter, the scenario called 'Base' is constructed as the 'most likely' scenario for traffic, most closely following the current trends. It considers a moderate economic growth with regulation reflecting environmental, social and economic concerns to address aviation sustainability. This scenario follows both the current trends, and what are seen as the most likely trends into the future.

Amongst the models applied by EUROCONTROL for the forecast the passenger traffic sub-model is the most developed and is structured around five main groups of factors that are taken into account.

Amongst the models applied by EUROCONTROL for the forecast the passenger traffic sub-model is the most developed and is structured around five main group of factors that are taken into account:

- Global economy factors represent the key economic developments driving the demand for air transport.
- Factors characterizing the passengers and their travel preferences change patterns in travel demand and travel destinations.
- Price of tickets set by the airlines to cover their operating costs influences passengers' travel decisions and their choice of transport.
- More hub-and-spoke or point-to-point networks may alter the number of connections and flights needed to travel from origin to destination.
- Market structure considers a detailed analysis of the fleet forecast and innovative projects, hence the future size of aircraft used to satisfy the passenger demand (modelled via the Aircraft Assignment Tool).

<sup>&</sup>lt;sup>23</sup> EUROCONTROL Long-Term Aviation Outlook to 2050, EUROCONTROL, December 2024. (link to the report https://www.eurocontrol.int/publication/eurocontrol-forecast-2024-2050)

Figure 5.1.1 below presents a summary of the social, economic and air traffic related characteristics of three different scenarios developed by EUROCONTROL. The year 2023 served as the baseline year of the 30-year forecast results<sup>24</sup> (published in 2024 by EUROCONTROL). Historical data for the year 2010 and 2019 are also shown later for reference.

	High	Base	Low
7-year flight forecast 2024-2030	High <b>刁</b>	Base →	Low 🔰
Passenger Demographics (Population)	Aging UN Medium-fertility vari- ant	Aging UN Medium-fertility vari- ant	Aging UN Zero-migration va- riant
Routes and Destinations	Long-haul 🛪	No Change →	Long-haul 🔰
High-Speed&Night trains (new & improved con- nections)	32 HST/29 NT city-pairs faster implementation	31 HST/29 NT city-pairs	26 HST city-pairs later implementation.
Economic conditions  GDP growth	Stronger <b>7</b>	Moderate →	Weaker 🄰 🔰
EU Enlargement	+7 States, Later	+7 States, Earliest	+7 States, Latest
Free Trade	Global, faster	Limited, later	None
<b>Price of travel</b> Operating cost	Decreasing 🔰 🔰	Decreasing 🐿	No change →
Price of CO <sub>2</sub> in Emission Trading Scheme	Moderate, increasing <b>7</b>	Moderate, increasing <b>7</b>	Moderate, Increasing 🗷
Price of oil/barrel	Moderate	Moderate	High
Price of SAF	Relatively High 🗷	Relatively High <b>7</b>	Highest 77
<b>Structure</b> Network	Hubs: Mid-East 77 Europe > Türkiye 7 Point-to-point: N- Atlantic. >	Hubs: Mid-East 77 Europe & Türkiye 7 Point-to-point: N-At- Iantic 7, European Secondary Airports.7	No change <del>→</del>
Market Structure	Industry fleet forecast, Clean Aviation and STATFOR assumptions	Industry fleet forecast, Clean Aviation and STATFOR assumptions	Industry fleet forecast, Clean Aviation and STATFOR assumptions
Fuel mix	In line with ReFuelEU Aviation (2%SAF in 2025 to 70% in 2050)	In line with ReFuelEU Aviation (2% SAF in 2025 to 70% in 2050)	5 years behind ReFu- elEU Aviation (0.5%SAF in 2025 to 42% in 2050)

Figure 5.1.1 Summary characteristics of EUROCONTROL scenarios

 $<sup>^{24}\, {\</sup>sf EUROCONTROL}\, Long-Term\, A viation\, Outlook\, to\, 2050, EUROCONTROL, December\, 2024.\, (link\, to\, the\, report\, https://www.eurocontrol.int/publication/eurocontrol-forecast-2024-2050)$ 

#### 5.1.2 Update of the EUROCONTROL Aviation Long-Term Outlook to 2050

In November 2023, EUROCONTROL started to work on an update of its EUROCONTROL Aviation Long-Term Outlook to 2050 (EAO). It is an update of the previously published EAO $^{25}$  (April 2022), covering the long-term flights and CO $_2$  emissions forecast to 2050, which was based on 2019 historical flight data. The 2024 edition of the EAO forecast is now based on the latest available actual flight data (2023) and uses the EUROCONTROL seven-year forecast (2024-2030). It includes a complete review of the fleet forecast assumptions as well as a review of other inputs: high-speed rail network development, impact of Sustainable Aviation Fuels (SAF) mandate, jet fuel and CO $_2$  allowances on ticket prices, as well as future airport capacity constraints.

EUROCONTROL also provides an update of its modelling framework and traffic environmental assessment with the IMPACT model including:

- an updated technological freeze baseline operations forecast using only growth and replacement in-production aircraft in the baseline year (traffic and fleet baseline scenario) from 2023 to 2050;
- an updated baseline passenger data (Eurostat). Additional data sources may be required to cover the ECAC region;
- Latest versions of the Aircraft Noise and Performance (ANP) database, BADA, ICAO Aircraft Engine Emissions Database (AEEDB), versions of March 2024;
- Updated assumptions on future technologies, operational efficiency, SAF (e.g. based on the CAEP/13 Environmental Trends complemented with information on emerging technologies).

Figure 5.1.2 below shows the ECAC scenario of the passenger flight forecasted international departures for both historical (solid line) and future (dashed line) years.

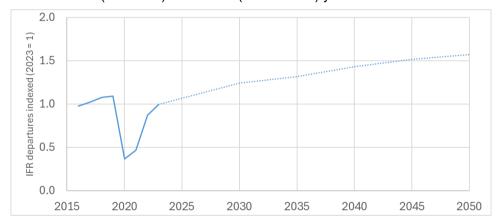


Figure 5.1.2. Updated EUROCONTROL 'Base' scenario of the passenger flight forecast for ECAC international departures from 2024 to 2050.

#### 5.1.3 Further assumptions and results for the baseline scenario

The ECAC baseline scenario was generated by EUROCONTROL for all ECAC States. It covers all commercial international passenger flights departing<sup>26</sup> from ECAC airports, as forecasted in the aforementioned traffic 'Base' scenario. The number of passengers per flight is derived from Eurostat data.

EUROCONTROL also generates a forecast for all-cargo flights in its baseline scenario. However, no information about the freight tonnes carried is available. Hence, historical and forecasted cargo traffic have been extracted from another source (ICAO<sup>27</sup>). This data, which is presented below, includes both belly cargo transported on passenger flights and freight transported on dedicated all-cargo flights.

<sup>&</sup>lt;sup>25</sup> EUROCONTROL Aviation Outlook to 2050, EUROCONTROL, April 2022.

<sup>&</sup>lt;sup>26</sup> International departures only. Domestic flights are excluded. A domestic is any flight between two airports in the State, regardless of the operator or which airspaces they enter en-route. Airports located in overseas are attached the State having the sovereignty of the territory. For example, France domestic includes flights to Guadeloupe, Martinique, etc.

<sup>&</sup>lt;sup>27</sup> ICAO Long-Term Traffic Forecasts, Cargo, Europe, International (excluding Russian Federation, Belarus and Greenland), 2021.

Historical fuel burn and emission calculations are based on the actual flight plans from the PRISME  $^{28}$  data warehouse used by EUROCONTROL, including the actual flight distance and the cruise altitude by airport pair. These calculations were made with a subset of total passenger traffic (with available and usable information in the flight plans) covering 98% in 2010, and 99% in 2019 and 2030. Determination of the fuel burn and  $CO_2$  emissions for historical years is built up as the aggregation of fuel burn and emissions for each aircraft of the associated traffic sample characteristics. Fuel burn and  $CO_2$  emission results consider each aircraft's fuel burn in its ground and airborne phases of flight and are obtained by use of the EUROCONTROL IMPACT environmental model, with the aircraft technology level of each year.

Forecast years (until 2050) fuel burn and modelling calculations use the 2023 flight plan characteristics as much as possible, to replicate actual flown distances and cruise levels, by airport pairs and aircraft types. When not possible, this modelling approach uses past years traffics too, and, if needed, the ICAO CAEP forecast modelling. The forecast fuel burn and CO<sub>2</sub> emissions of the baseline scenario for forecast years use the technology level of 2023. The usable forecast passenger traffic for calculation represents 99.7% of the total available passenger traffic.

For each reported year, the revenue per passenger kilometre (RPK) calculations use the number of passengers carried for each airport pair multiplied by the great circle distance between the associated airports and expressed in kilometres. Because of the coverage of the available passenger estimation datasets (Scheduled, Low-cost, Non-Scheduled flights, available passenger information, etc.) these results are determined for 96% of the historical passenger traffic in 2010, 97% in 2019, 99% in 2023, and around 99% of the passenger flight forecasts.

From the RPK values, the passenger flights RTK can be calculated as the number of tonnes carried by kilometres, assuming that one passenger corresponds to 0.1 tonne.

The fuel efficiency represents the amount of fuel burn divided by the RPK for each available airport pair with passenger data, for the passenger traffic only. Therefore, the fuel efficiency can only be calculated for city pairs for which the fuel burn and the RPK values exists<sup>29</sup>.

The following figures show the results for this baseline scenario, which is intended to serve as a reference case by approximating fuel consumption and CO<sub>2</sub> emissions of European aviation in the absence of mitigation actions.

Year	Passenger Traffic (IFR movements) (million)	Revenue Pas- senger Kilome- tres <sup>30</sup> RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres trans- ported <sup>31</sup> FTKT (billion)	Total Revenue Tonne Kilome- tres14, <sup>32</sup> RTK (billion)
2010	4.71	1'140	0.198	41.6	155.6
2019	5.88	1'874	0.223	46.9	234.3
2023	5.38	1'793	0.234	49.2	228.5
2030	6.69	2'176	0.262	55.9	273.5
2040	7.69	2'588	0.306	69.0	327.8
2050	8.46	2'928	0.367	86.7	379.5

Figure 5.1.3 Baseline forecast for international traffic departing from ECAC airports

<sup>&</sup>lt;sup>28</sup> PRISME is the name of the EUROCONTROL data warehouse hosting the flight plans, fleet and airframe data.

<sup>&</sup>lt;sup>29</sup> Dividing the Fuel by the RPK results of the tables presented in this document is not suitable to estimate the fuel efficiency (traffic coverage differences). The presented result has been calculated on an airport pair basis.

<sup>&</sup>lt;sup>30</sup> Calculated on the basis of Great Circle Distance (GCD) between the airports of the available passenger reports (subset of the global traffic; from 97% in 2010 up to 99% for the forecast years).

<sup>&</sup>lt;sup>31</sup> Includes passenger and freight transport (on all-cargo and passenger flights).

<sup>&</sup>lt;sup>32</sup> A value of 100 kg has been used as the average mass of a passenger incl. baggage (ref: ICAO).

Year	Fuel Consump- tion (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)			
2010	38.08	120.34	0.0327	0.327			
2019	53.30	168.42	0.0280	0.280			
2023	48.41	152.96	0.0268	0.268			
2030	54.46	172.10	0.0250	0.250			
2040	62.19	196.52	0.0240	0.240			
2050	69.79	220.54	0.0238	0.238			
For reas	For reasons of data availability, results shown in this table do not include cargo/freight traffic.						

Figure 5.1.4 Fuel burn and CO<sub>2</sub> emissions forecast for the baseline scenario

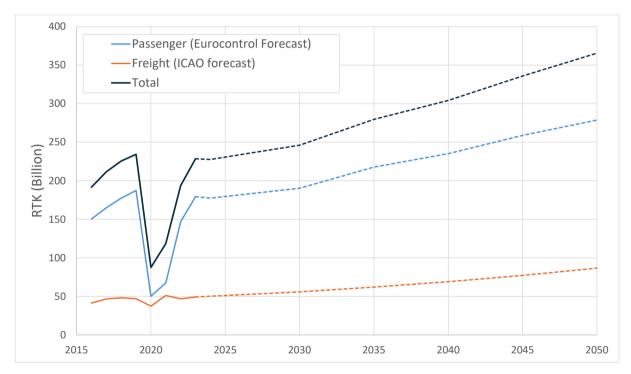


Figure 5.1.5 Forecasted traffic until 2050 (assumed both for the baseline and implemented measures scenarios)

Although data are not shown in Figure 5.1.3, the number of flights between 2019 and 2023 in Figure 5.1.5, as this is reflecting the impact of the COVID-19 starting in 2020. If the passenger segment has been drastically affected by the outbreak, the freight segment seemed more immune.

As detailed by Figure 5.1.4, from 2010 to 2019, the  $CO_2$  emissions increased from 120 to 168 million tonnes, corresponding to an annual growth rate of 3.8%. In 2023, due to the impact of the COVID-19 crisis on the traffic, the  $CO_2$  emissions were lower than the 2019 level, with 153 million tonnes. For the forecast years, the estimated  $CO_2$  emissions of the ECAC Baseline scenario would increase from 172 million tonnes in 2030 to 220 million tonnes in 2050 (corresponding to annual growth rate of 1.25%).

The fuel efficiency improvement is expected to be less important in the forecast years (annual growth rate of 0.4% between 2023 and 2050) than between 2010 and 2023 (1.5% per year), mainly due to the entry into service of the new generation aircraft families (e.g. MAXs, NEOs).

# 5.2 ECAC Scenario with Implemented Measures, Estimated Benefits of Measures

To improve fuel efficiency and to reduce future air traffic emissions beyond the projections in the base-line scenario, ECAC States have taken further action. Assumptions for a top-down assessment of the effects of mitigation actions are presented here, based on modelling results by EUROCONTROL and EASA. Measures to reduce aviation's fuel consumption and emissions will be described in the following chapters.

For reasons of simplicity, the scenario with implemented measures is based on the same traffic volumes as the baseline case, i.e. updated EUROCONTROL's 'Base' scenario described earlier. Unlike in the baseline scenario, the effects of aircraft-related technology development and improvements in ATM/operations as well as SAF are considered here for a projection of fuel consumption and CO<sub>2</sub> emissions up to the year 2050.

Effects of improved aircraft technology are captured by simulating fleet roll-over and considering the fuel efficiency improvements of the expected future aircraft types with conventional engines (e.g. Boeing 777X, reengineered Airbus A321Neo, etc..) and powered by hybrid electric and hydrogen engines. The simulated future fleet of aircraft has been generated using the Aircraft Assignment Tool<sup>33</sup> (AAT) developed collaboratively by EUROCONTROL, EASA and the European Commission. The retirement process of AAT is performed year by year, allowing the determination of the number of new aircraft required each year.

This technical improvement is modelled by a constant annual improvement of fuel efficiency of 1.16% per annum is assumed for each aircraft type, with entry into service from 2024 onwards. This rate of improvement corresponds to the 'Advanced' fuel technology scenario used by CAEP to generate the fuel trends for the Assembly. This modelling methodology is applied to the years 2030 to 2050. In addition, the entry into service of hybrid electric and hydrogen aircraft types in the traffic induce a percentage of baseline fuel consumption reduction ramping up from 0% in 2035 to 5% in 2050.

The effects of improved ATM efficiency are captured in the Implemented Measures Scenario based on the European ATM Master Plan, managed by SESAR 3. This document defines a common vision and roadmap for ATM stakeholders to modernise and harmonise European ATM systems, including an aspirational goal to reduce average CO<sub>2</sub> emission per flight by 5-10% (0.8-1.6 tonnes) by 2035 through enhanced cooperation. Improvements in ATM system efficiency beyond 2023 were assumed to bring reductions in full-flight CO<sub>2</sub> emissions gradually ramping up to 5% in 2035 and 10% in 2050. These reductions are applied on top of those coming from aircraft/engine technology improvements.

The yet un-estimated benefits of Exploratory Research projects<sup>34</sup> are expected to increase the overall future fuel savings.

While the effects of introduction of SAF were modelled in previous updates on the basis of the European ACARE goals 35, the expected SAF supply objectives for 2020 were not met. In the current update, the SAF benefits are modelled as a European regional common measure applied to the EU27+EFTA international traffic. It assumes that the minimum shares of SAF laid down in ReFuelEU Aviation Regulation would be met in the base scenario. According to the Regulation, the percentage of SAF used in air transport gradually ramps from 2% in 2025, up to 20% in 2035 and 70% in 2050. A decarbonation factor value of 70% of CO2 emissions is expected for synthetic aviation fuels and 65% for aviation biofuels. As the SAF-related calculations can only be applied for countries that are expected to implement regional regulations (e.g. ReFuelEU Aviation), the tank-to-wake Net CO2 emissions are reported in the Appendix of this document for EU27+EFTA international traffic only.

<sup>33</sup> https://www.easa.europa.eu/domains/environment/impact-assessment-tools

<sup>&</sup>lt;sup>34</sup> See SESAR Exploratory Research projects - https://www.sesarju.eu/exploratoryresearch

<sup>&</sup>lt;sup>35</sup> https://www.acare4europe.org/sria/flightpath-2050-goals/protecting-environment-and-energy-supply-0

However, numerous initiatives related to SAF (e.g. ReFuelEU Aviation) are largely described in section **Fehler! Verweisquelle konnte nicht gefunden werden.** and it is expected that future updates will include an assessment of its benefits as a collective measure.

Effects on aviation's  $CO_2$  emissions of market-based measures including the EU Emissions Trading System (ETS) with the linked Swiss ETS, the UK ETS and the ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) have not been modelled in the top-down assessment of the implemented measures scenario presented here. CORSIA aims for carbon-neutral growth (CNG) of aviation, and this target is therefore shown Figure 5.2.2<sup>36</sup>

The EU ETS quantifications are described in more details in chapter EU Emissions Trading System 6.4.1.

Figure 5.2.1 to Figure 5.2.5 summarize the results for the scenario with implemented measures. It should be noted that Figure 5.2.3 and Figure 5.2.5 show direct combustion emissions of  $CO_2$  (assuming 3.16 kg  $CO_2$  per kg fuel). More detailed tabulated results are found in the Appendix, including results expressed in equivalent  $CO_2$  emissions on a well-to-wake basis (for comparison purposes of SAF benefits).

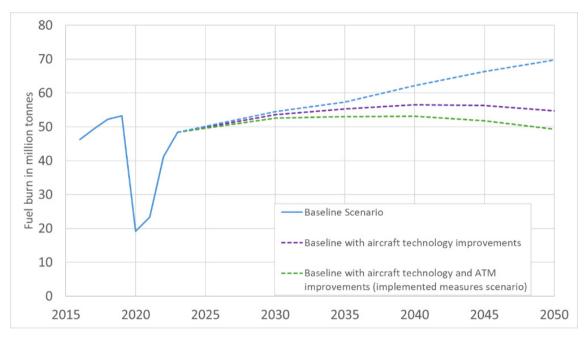


Figure 5.2.1 Fuel consumption forecast for the baseline and implemented measures scenarios (international passenger flights departing from ECAC airports).

27

<sup>&</sup>lt;sup>36</sup> Note that in a strict sense the CORSIA target of CNG is aimed to be achieved globally (and hence not necessarily in each world region).

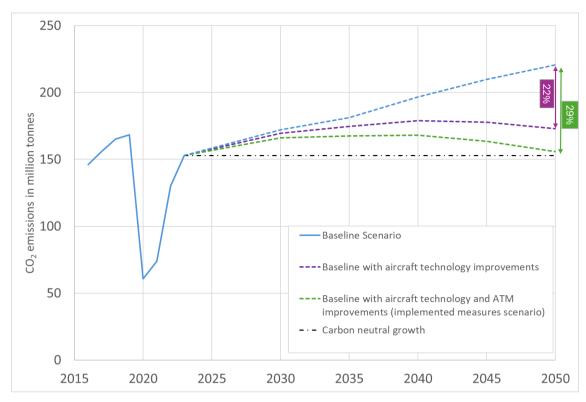


Figure 5.2.2 CO<sub>2</sub> emissions forecast for the baseline and implemented measures scenarios

As shown in Figure 5.2.1 and Figure 5.2.2, the impact of improved aircraft technology indicates an overall 22% reduction of fuel consumption and  $CO_2$  emissions in 2050 compared to the baseline scenario. Overall  $CO_2$  emissions, including the effects of new aircraft types (conventional, hybrid electric and Hydrogen) and ATM-related measures, are projected to lead to a 29% reduction in 2050 compared to the baseline.

Year	Fuel Consump- tion (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK <sup>37</sup> )	Fuel efficiency (kg/RTK)				
2010	38.08	120.34	0.0327	0.327				
2019	53.30	168.42	0.0280	0.280				
2023	48.41	152.96	0.0268	0.268				
2030	52.57	166.11	0.0241	0.241				
2040	53.20	168.11	0.0205	0.205				
2050	49.29	155.75	0.0168	0.168				
For reas	sons of data availabi	lity, results shown in	For reasons of data availability, results shown in this table do not include cargo/freight traffic.					

Figure 5.2.3 Fuel burn and CO<sub>2</sub> emissions forecast for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

As detailed in Figure 5.2.4, under the currently assumed aircraft and ATM improvement scenarios, the fuel efficiency is projected to lead to a 37% reduction from 2023 to 2050. The annual rate of fuel efficiency improvement is expected to be at 1.5% between 2023 and 2030 and reach 2% between 2040 and 2050. However, aircraft technology and ATM improvements alone will not be sufficient to meet the post-2020 carbon neutral growth objective of ICAO, nor will the use of alternative fuels, even if Europe's ambitious targets for alternative fuels (SAF) are met. This confirms that additional action, particularly market-based measures, are required to fill the gap.

 $<sup>^{37}</sup>$  Calculated on the basis of Great Circle Distance (GCD) between airports, for 97% of the passenger traffic for forecast years

Period	Average annual fuel efficiency improvement (%)
2010-2023	-1.50%
2023-2030	-1.51%
2030-2040	-1.60%
2040-2050	-1.98%

Figure 5.2.4 Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology and ATM improvements only)

The Figure 5.2.5 below summarises the cumulated effects of each implemented measure. It identifies the weight of the technical improvement on the reduction of  $CO_2$  emissions (from 2% in 2030 to 22% in 2050 compared to the Baseline scenario). The overall impact of the implemented measures (aircraft technology improvements and ATM) shows a reduction of  $CO_2$  emissions by 29% in 2050 compared to the Baseline scenario.

Year		CO <sub>2</sub> emissions (1	% improvement by Implemented Measures						
	Baseline	Implemented Me							
	Scenario	Aircraft techn. im- provements only	Aircraft techn. and ATM improvements	(full scope)					
2010		120,34	NA						
2019		168,42	NA						
2023		152,96	NA						
2030	172,10	196,50	166,11	-3%					
2040	196,52	178,84	168,11	-14%					
2050	220,54	173,06	155,75	-29%					
For reasons of data availability, results shown in this table do not include cargo/freight traffic.									

Figure 5.2.5 CO<sub>2</sub> emissions forecasts for the scenarios described in this chapter

The Appendix of this document provides the detailed results for each scenario, Baseline, and by implemented measure, as well as the  $CO_2$  equivalent and EU27+EFTA Net  $CO_2$  emissions.

# VI Actions taken collectively throughout Europe

The European Section of this action plan, which is common to all European State action plans, presents a summary of the actions taken collectively in the 44 States of the European Civil Aviation Conference (ECAC) to reduce CO<sub>2</sub> emissions from the aviation system against a background of increased travel and transport.

The Directors General (DGCA) of ECAC agreed on a common language for the section with actions taken collectively throughout Europe<sup>38</sup>. This section includes this common language elaborated by the European Coordination Group APER TG (Action Plan Emission Reduction Task Group). Switzerland was closely involved in the process of writing the common section.

For over a century, Europe has led the development of new technology, monitoring its impacts and developing new innovations to better meet societies developing needs and concerns. From the dawn of aviation, governments and industry across the region have invested heavily to understand and mitigate the environmental impacts of aviation, initially focussing on noise, then adding air quality and more recently the emissions affecting the global climate and CO<sub>2</sub> from fuel burn in particular. This is all taking place in a sector ever striving to improve safety and security whilst also reducing operating costs and improving fuel efficiency.

Some of these mitigating actions have domestic beginnings that stretch to international aviation whilst others are part of centralised cross-cutting funding such as through the EU Research Framework programmes. The aviation sector has also benefitted from large bespoke programmes such as the EU's Single European Sky ATM Research Initiative (SESAR).

The European common section also includes new innovations being tried and tested in a range of demonstration trials to reduce fuel burn and  $CO_2$  emissions at different stages of different flights, airports or routes. These might not be contributing to measured benefits in day-to-day operations yet, but Europe can anticipate a stream of future implementation actions and additional  $CO_2$  savings.

The implementation of the measures of the European common section in Switzerland is dependent on political discussions and decisions. However, it has to be noted that Switzerland is not a member of the EU and EEA, hence some of the measures are only limited pertinent for Switzerland.

Specific elements of the national contribution of Switzerland to the basket of measures are described in Section VII.

# 6.1 Technology and Design

- There have been a limited number of new certified large transport aircraft and engine types over the last few years with marginal environmental improvements, while deliveries of the latest generation of aircraft continue to penetrate the European fleet.
- Certification of all in-production aircraft types against the ICAO CO<sub>2</sub> standard is required by 1 January 2028, which is leading to an increase in activities within this area.
- Environmental technology standards will be important in influencing new aircraft-engine designs and contributing to future sustainability goals.
- In February 2025 the ICAO CAEP is aiming to agree on new aircraft noise and  $CO_2$  limits that would become applicable in the next five years.
- ICAO independent experts medium-term (2027) and long-term (2037) technology goals were agreed in 2019 and are becoming outdated.
- Emissions data measured during the engine certification process acts as an important source of information to support modelling of operational emissions in cruise.

 $<sup>^{38}</sup>$  ECAC 2024: EC 9/8.20/6 – 0930 28<sup>th</sup> November 2024; ICAO States' Action Plans for CO<sub>2</sub> Emissions Reduction - 5th Edition of the ECAC/EU guidelines including a common section to be incorporated into all European action plans

- There have been further developments within the low carbon emissions aircraft market (e.g. electric, hydrogen), with support from the Alliance for Zero-Emissions Aircraft to address barriers to entry into service and facilitate a potential reduction in short / medium-haul CO<sub>2</sub> emissions of 12% by 2050.
- EASA has published noise measurement Guidelines and Environmental Protection Technical Specifications in order to respond to the emerging markets of Drones and Urban Air Mobility.
- EASA has launched a General Aviation Flightpath 2030+ program to accelerate the transition of propulsion technology, infrastructure and fuels to support sustainable operations.
- Horizon Europe, with a budget of €95 billion, is funding collaborative and fundamental aviation research, as well as partnerships (e.g. Clean Aviation, Clean Hydrogen) who are developing and demonstrating new technologies to support the European Green Deal.

The European Union Aviation Safety Agency (EASA) develops and implements aircraft environmental certification standards 39 40 41 42 that manufacturers have to comply with in order to register their products within the EU and EFTA States.

The recent certification of new types of large transport aircraft and engines has continued to be focused on performance improvement packages for aircraft certified in the 2010s (e.g. Airbus A350, A330neo and A320neo; Boeing 737MAX and 787). The penetration of these aircraft types into the European fleet has slowed due to reduced annual deliveries following the COVID crisis and the average margin to the latest noise standard of the new deliveries is levelling off. In contrast, there has been increased research and certification activity in emerging markets such as zero carbon emission aircraft (e.g. electric and hydrogen powered aircraft).

#### 6.1.1 Aircraft environmental standards

Aircraft CO<sub>2</sub> emissions: Since 1 January 2020, new aircraft types have to comply with a new type CO<sub>2</sub> standard<sup>43</sup>, although no aircraft has been certified against this standard as of the start of 2025. The focus thus far has been on certifying in-production aircraft types against a less stringent in-production CO<sub>2</sub> standard as all aircraft have to be certified against this new requirement if they wish to continue to be produced beyond 1 January 2028.

As of the end of 2024, Airbus continues to be the only manufacturer to have certified in-production aircraft types, such as the A330-800neo and -900neo variants (Figure 1.4), and so the availability of certified CO<sub>2</sub> data remains limited<sup>44</sup>. In light of the approaching production cut-off deadline in 2028, certification of other aircraft types is ongoing by EASA and other regions of the world have also implemented the CO<sub>2</sub> standard into their legislation with it becoming effective in the US on 16 April 2024. The 2019 ICAO Independent Experts Panel goals for leading edge CO<sub>2</sub> emissions performance in 2027 and 2037 would need to be reviewed soon for them to remain relevant.

<sup>&</sup>lt;sup>39</sup> EU (2018), Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency.

<sup>&</sup>lt;sup>40</sup> ICAO (2023), Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume I, 8th Edition, Amendment 14 — Aircraft Noise.

<sup>&</sup>lt;sup>41</sup> ICAO (2023), Annex 16 to the Convention on International Civil Aviation —Environmental Protection, Volume II, 5th Edition, Amendment 11 — Aircraft Engine Emissions.

42 ICAO (2023), Annex 16 to the Convention on International Civil Aviation — Environmental Protection, Volume III, 1st Edition.

Amendment 1 — Aeroplane CO<sub>2</sub> Emissions.

<sup>&</sup>lt;sup>43</sup> ICAO Annex 16, Volume III to the Chicago Convention contains international aircraft CO<sub>2</sub> standards. The CO<sub>2</sub> metric is a specific air range-based metric (kg fuel per km flown in cruise) adjusted to take into account fuselage size.

<sup>&</sup>lt;sup>44</sup> EASA (2025), EASA Aeroplane CO<sub>2</sub> Emissions Database.

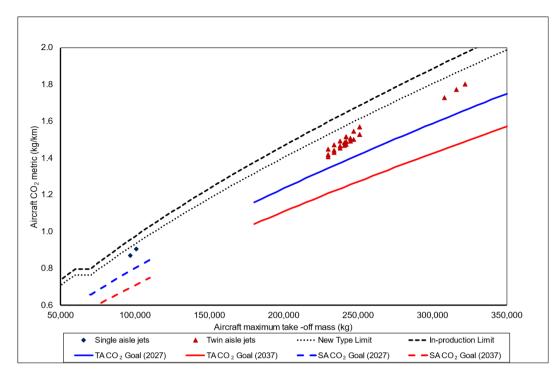


Figure 6.1.1 Certified aircraft CO<sub>2</sub> emissions performance

ICAO dual Noise / CO2 standard setting: A revision of the ICAO Annex 16 standards for aircraft noise



and  $CO_2$  emissions is currently being considered by the ICAO Committee on Aviation Environmental Protection (CAEP). This is the first time that CAEP standard setting has reviewed two standards at the same time in the form of an integrated dual stringency process taking into account design trade-offs at the aircraft level. The environmental benefits and associated costs of a broad range of options for more stringent new type standards have been assessed for an applicability date in the next 5 years. A recommendation by CAEP on new noise and  $CO_2$  limits is due at the CAEP/13 meeting in February 2025.

Considering the long-term development and in-service time-scales of new aircraft types, it will be important to set an updated new type  $CO_2$  standard that will influence the fuel efficiency of future designs and effectively contribute to the ICAO Long-Term Aspirational Goal of net zero carbon emissions from international aviation by 2050<sup>45.</sup>



#### 6.1.2 Low carbon emissions aircraft

In recent years, EASA has received an increasing number of enquiries with regard to the certification of novel aircraft configurations and sources of propulsion with zero carbon emissions in operation when produced with renewable energy.

<sup>&</sup>lt;sup>45</sup> ICAO (2025), <u>ICAO Long Term Global Aspirational Goal (LTAG) for International Aviation</u>

Electric propulsion: Regarding Vertical take-off and landing Capable Aircraft (VCA – otherwise known as Urban Air Mobility or Advanced Air Mobility vehicles), EASA has recently published two Environmental Protection Technical Specifications (EPTS), which both underwent public consultation. The first

EPTS, published in 2023, addresses VCA with non-tilting rotors [7], covering designs such as the Volocopter VoloCity or Airbus CityAirbus. The second EPTS, published in 2024, was for VCA powered, at least partially, by tilting rotors [8], covering designs such as the Lilium Jet. These two EPTS cover the majority of VCA designs currently envisioned and will be utilized in the corresponding noise certification



programs. They were derived from legacy noise standards for large helicopters and tilt rotors, adapted to the VCA characteristics and expanded on to include hover condition measurement points. The same noise limits as for large helicopters are being used until more data can be collected. Ultimately, an EU Delegated Act will aim at incorporating the content of these EPTS into EASA noise regulations.

EASA Innovative Air Mobility Hub: The EASA Innovative Air Mobility (IAM) Hub <sup>46</sup> is a unique digital platform, developed by a dedicated Task Force that brings together all actors in the European system including cities, regions, National authorities, the EU, operators and manufacturers. The primary goal is to facilitate the safe, secure, efficient, and sustainable implementation of IAM (e.g. Drones, UAMs) practices.

The platform currently comprises of five modules, including Drone and eVTOL Design, Rules and Regulations, Knowledge and Info Cards, Operational Information and Geographical Data such as pop-



ulation data. Various strategies have been deployed to mitigate the environmental impacts from UAS and VCA (e.g. regulations, no-fly zones, geofencing, altitude restrictions, remote identification) with a goal to balance the benefits of these new technologies with the need to protect EU citizens. A methodology to underpin a full life-cycle environmental assessment of IAM aircraft, known as Environmental Footprint Aviation, is also being developed 47.

Hydrogen-powered Aircraft: The potential of hydrogen to power carbon-free flight has rekindled interest in this alternative fuel, with green hydrogen being relatively easy to produce, provided sufficient renewable energy is available. In particular, there has been a strong interest in the potential of hydrogen used in conjunction with fuel cells and electric motors for regional / short-haul aviation, where the weight of batteries needed for energy storage is currently seen by many as restrictive.

<sup>&</sup>lt;sup>46</sup> EASA (2025), Environmental Footprint Aviation Study for Drones & eVTOLs.

<sup>&</sup>lt;sup>47</sup> AZEA (2025), Alliance for Zero Emission Aircraft.

Pioneers in the field have advanced their flight test activity, with H2FLY conducting the world's first piloted flight of a liquid hydrogen powered electric aircraft in September 2023, using their HY4 demonstrator aircraft, operating from Maribor in Slovenia. Other notable flights include ZeroAvia's flight test campaign using a Dornier 228 with the left side propeller powered by their ZA600 prototype engine and, most recently, Beyond Aero achieved France's first manned fully hydrogen-electric flight, using a retrofit model G1 SPYL-XL to demonstrate their technology.



Although the headlines have primarily been related to these aforementioned flight tests using fuel cells, there has also been demonstrable progress on hydrogen combustion technology with Rolls Royce, Safran and GE all successfully running ground tests in this field.

Alliance for Zero Emission Aviation: The Alliance for Zero Emission Aviation (AZEA) was launched in June 2022 and aims to prepare the aviation ecosystem for the entry into service of hydrogen and electric aircraft<sup>48</sup>. It contains 181 Members representing industry, standardisation and certification agencies, research bodies, environmental interest groups and regulators. AZEA members jointly work to identify barriers to entry into commercial service of these aircraft, establish recommendations and a roadmap to address them, promote investment projects and create synergies and momentum amongst members.



In June 2023, AZEA published an overview of the current aviation regulatory landscape for hydrogen and electric aircraft<sup>49</sup>, which describes the activities that EASA is doing to adapt the aviation regulatory framework to facilitate the entry into the market of aircraft that use electric or hydrogen propulsion. To support the introduction of disruptive technologies, innovative concepts (including ground and air operations) or products, whose feasibility may need to be confirmed, and for which an adequate regulatory framework does not yet exist or is not mature, EASA is engaging with future applicants through various Innovation Services<sup>50</sup>.

With performance-based regulations there is a higher need for supporting industry standards for regulatory compliance and interoperability. As such, AZEA has also published a document mapping existing standards and committees working in this area, including EUROCAE, SAE and ASTM<sup>51</sup>. Further work to identify where new standards are needed is on-going and will serve as a resource for Standards Development Organizations and industry stakeholders to identify opportunities for collaboration and harmonization of activities.

In January 2024, AZEA published its Concept of Operation (CONOPS) for the introduction of electric, hybrid-electric and hydrogen powered aircraft<sup>52</sup>. This addresses the challenges and opportunities arising from the integration of these new market segments into the European aviation system, covering all components of the European Air Traffic Management network, in particular airports. The CONCOPS is expected to be reassessed once robust aircraft performance data becomes available.

<sup>&</sup>lt;sup>48</sup> AZEA (2025), <u>Alliance for Zero Emission Aircraft</u>.

<sup>49</sup> AZEA (2023), Current aviation regulatory landscape for aircraft powered by hydrogen or electric propulsion.

<sup>&</sup>lt;sup>50</sup> EASA (2025), <u>Innovation Services</u>.

<sup>&</sup>lt;sup>51</sup> AZEA (2023), <u>Current Standardisation Landscape</u>.

<sup>&</sup>lt;sup>52</sup> AZEA (2024), Concept of Operation for the Introduction of Electric, Hybrid-electric and Hydrogen powered Zero Emission Aircraft.

The AZEA vision "Flying on Electricity and Hydrogen in Europe" published in June  $2024^{53}$  has developed a baseline scenario that, while recognising that long-haul flights relying on these power sources cannot be anticipated before 2050, predicts approximately 5000 electric and hydrogen aircraft (excluding urban air mobility vehicles and helicopters) will be delivered to European operators between now and 2050, leading to a reduction in short and medium-haul  $CO_2$  emissions of 12%. While there are considerable challenges requiring the collaboration of all stakeholders, beyond these hurdles is an opportunity to reshape the aviation sector and to pioneer a sustainable future.

	2020	2025	2030	2035	2040	2045	2050
Commuter  » 9-19 seats  » < 60 minute flights  » < 1% of industry CO2	SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF
Regional  » 50-100 seats  » 30-90 minute flights  » ~3% of industry CO2	SAF	SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF	Electric or Hydrogen fuel cell and/or SAF
Short haul  » 100-150 seats  » 45-120 minute flights  » ~24% of industry CO <sub>2</sub>	SAF	SAF	SAF	SAF potentially some Hydrogen	Hydrogen and/or SAF	Hydrogen and/or SAF	Hydrogen and/or SAF
Medium haul  » 100-250 seats  » 60-150 minute flights  » ~43% of industry CO <sub>2</sub>	SAF	SAF	SAF	SAF	SAF potentially some Hydrogen	SAF potentially some Hydrogen	SAF potentially some Hydrogen
Long haul  » 250+ seats  » 150 minute + flights  » ~30% of industry CO2	SAF	SAF	SAF	SAF	SAF	SAF	SAF

Figure 6.1.2 ATAG indicative overview of where low- and zero-carbon energy could be deployed in commercial aviation alongside that of SAF<sup>54</sup>

#### 6.1.3 Supersonic aircraft

Following the retirement of Concorde in 2003, several manufacturers have been looking into developing supersonic business jets, with some currently looking at an entry into service date of around 2030. Key environmental challenges to address include the use of significantly more fuel on a per passenger kilometre basis compared to subsonic commercial aircraft<sup>55</sup>, and noise, specifically the impact of the sonic boom generated when flying at supersonic speed.

#### 6.1.4 General Aviation Sustainability Roadmap

EASA is dedicated to making General Aviation (GA) more sustainable. Building on the success of the past GA Roadmap, the Agency has launched the new GA Flightpath 2030+ program in 2024<sup>56</sup>. GA is seen as a cradle for development, testing, and industrialization of innovations that, when tested and implemented operationally, can drive improvements across the entire aviation sector in safety and sustainability.

The 'Greener Faster' initiative is designed to achieve sector-wide agreement on what sustainable GA means and how everyone can work together to accelerate the transition of GA propulsion technology, infrastructure and fuels to support sustainable operations and the objective of carbon-free aviation by

<sup>&</sup>lt;sup>53</sup> AZEA (2024), Flying on electricity and hydrogen in Europe.

<sup>&</sup>lt;sup>54</sup> ATAG (2021), Waypoint 2050 Second Edition.

<sup>&</sup>lt;sup>55</sup> ICCT (2022), Environmental limits on supersonic aircraft in 2035.

<sup>&</sup>lt;sup>56</sup> EASA (2025), General Aviation Flightpath 2030+.

2050. This will be complemented by the 'Fly Direct' initiative that aims to optimize GA operations in the airspace by removing unnecessary operational restrictions, allowing aircraft to safely navigate the most efficient and environmentally friendly routes.

#### 6.1.5 Research and Innovation Programmes

Aviation environmental research is embedded in European, National and industry research programmes. At EU level, most research is currently funded through 'Horizon Europe' (2021-2027) with an initial budget of €95.5 billion<sup>57</sup>. Aviation specific research contributes primarily to the European Green Deal and the EU's digital and competitiveness strategies across all three Horizon Europe pillars.



Figure 6.1.3 Three pillars of Horizon Europe

- Pillar I: European Research Council science, which often advances the limits of science and technology (e.g. new materials, breakthrough physical processes, artificial intelligence and quantum computing, sensor technologies);
- Pillar II: Cluster 5 aviation programme has been the foundation of aeronautics research for over 35 years, including relevant partnerships (e.g. Clean Aviation, Clean Hydrogen and SESAR), industry-led technology demonstrators and Cluster 4 synergies (Digital, Industry and Space); and
- **Pillar III**: European Innovation Council research actions, with emphasis on supporting and connecting SMEs and the aviation supply chain.

The collaborative and fundamental Pillar II Cluster 5 aviation environmental research develops and derisks technologies up to a Technology Readiness Level (TRL) 4, to be taken further by Horizon Europe partnerships, national or industry programmes. The current research is focused on:

- lightweight, multifunctional and intelligent airframe and engine parts
- holistic digital framework for optimized design, manufacturing and maintenance
- uncertainties quantification for design, manufacturing and operation
- ultra-efficient aircraft propulsion
- electrified and hydrogen-enabled propulsion
- fuel-flexible combustion systems and cryogenic liquid hydrogen storage
- better understanding and mitigating non-CO<sub>2</sub> emissions, with emphasis on contrails
- reduction of NOx, and particulate matter emissions
- Noise reduction technologies and abatement procedures

-

<sup>&</sup>lt;sup>57</sup> EU (2025), Horizon Europe.

One such Horizon Europe project is HESTIA <sup>58</sup> that focuses on increasing the scientific knowledge of the hydrogen-air combustion of future hydrogen-fuelled aero-engines. Another example is BeCoM<sup>59</sup> which addresses the uncertainties related to the forecasting of persistent contrails and their weather-dependent individual radiative effects, in order to develop recommendations on how to implement strategies that enable air traffic management to reduce aviation's climate impact. Further information on the extensive projects funded under Horizon Europe research programme can be found on the European Commission website<sup>60</sup>.

Alliance for Zero Clean Sky 2 (part of 'Horizon 2020' – 2014 to 2020): The Clean Sky 2 projects (2014-2024) had a combined public and private budget of around €4 billion, with EU funding up to €1.75 billion<sup>61</sup>. Its objectives were to develop, demonstrate, and accelerate the integration of technologies capable of reducing CO<sub>2</sub>, NO<sub>x</sub> and Noise emissions by 20 to 30% compared to 'state-of-the-art' aircraft in 2014.



The benefits and potential impact from Clean Sky 2 research at the aircraft, airport and fleet level are evaluated through a dedicated Technology Evaluator function with key assessment and reporting duties. The final assessment by the Technology Evaluator was performed in 2024<sup>62</sup> and the results are summarised in Figure 6.1.4.

Mission Level Assessment							
Concept Model	Assessment	ssessment CO <sub>2</sub> <sup>1</sup> NOx <sup>1</sup>		Noise <sup>2</sup>			
Long Range	1st	-13%	-38%	<-20%			
(LR+)	2nd	-18.2%	-44.9%	-20.1%			
Short-Medium Range	1st	-17% to -26%	-8% to -39%	-20% to-30%			
(SMR+ & SMR++)	2nd	-25.8% to -30.4%	-2.3% to -5.1%	-11.5% to -16.3%			
Regional	1st	-20% to -34%	-56% to -67%	-20% to -68%			
(TP90 -TP130 - MM TP70)	2nd	-25% to -32.5%	-44% to -60%	+14% to -44%			
Commuter <sup>3</sup> & BJ	1st	-21% to -31%	-27% to -28%	-20% to-50%			
Commuter & BJ	2nd	-17.3% to -19.6%	-16.5% to -51.5%	-19% to -31%			

Figure 6.1.4 Final Clean Sky 2 Technology Evaluator Assessment Results

- (1) CO<sub>2</sub> and NO<sub>x</sub> values per passenger-kilometre.
- (2) Averaged Perceived Sound Volume Reduction (EPNLdB) according to ICAO Annex 16 conditions for fixed-wing aircraft (Chapter 10 for CS-23 aircraft and Chapter 14 for CS-25 aircraft). 20% noise reduction is equivalent to 3dB reduction.
- (3) Only fossil fuel concepts, excluding the innovative E-Short Take-Off and Landing (STOL) hybridelectric commuter concept.

<sup>&</sup>lt;sup>58</sup> EU (2025), HESTIA Horizon Europe project.

<sup>&</sup>lt;sup>59</sup> EU (2025), <u>BeCoM</u> Horizon Europe project.

<sup>60</sup> EU (2025), EU Research Projects.

<sup>&</sup>lt;sup>61</sup> Clean Sky 2 (2014), Council Regulation (EU) No 558/2014 of 6 May 2014 establishing the Clean Sky 2 Joint Undertaking.

<sup>62</sup> Clean Sky 2 (2024), Technology Evaluator.

Airport Level Assessment					
Assessment	CO <sub>2</sub>	NO <sub>x</sub>	Noise Area		
1st	-8% to-13.5%	-6.5% to -10.5%	-10% to-15%		
2nd	-11.5 to -15%	-10.5 to -14.5%	-8% to -17% (Lden <sup>1</sup> )		

(1) Surface area Reduction of Lden contours for 60-65 dB(A) noise levels at the European airports considered.

Fleet Level Assessment						
Assessment	CO <sub>2</sub>	NO <sub>x</sub>	Fleet Renewal			
1st	-14% to-15%	-29% to -31%	70% to 75% (ASK)			
2nd	-14.5%	-29%	71.4% (ASK) 61.6% (a/c)			

Clean Aviation (part of 'Horizon Europe' – 2021 to 2027): Clean Aviation was established in November 2021 under EU Horizon Europe to support the EU ambition of climate neutrality by 2050<sup>63</sup>. The Clean Aviation programme aims to develop disruptive aircraft technologies that will deliver net greenhouse gas (GHG) reductions of no less than 30%, compared to 2020 state-



of-the-art aircraft. The targets have been extended to CO<sub>2</sub> and non-CO<sub>2</sub> effects (nitrogen oxides, water vapour, particulates, contrails, etc.) and EASA is working with Clean Aviation to convey these benefits in the context of the ICAO Annex 16 environmental certification requirements. The technological and industrial readiness aims to allow deployment of these new aircraft no later than 2035, enabling 75% of the world's civil aviation fleet to be replaced by 2050.

Clean Aviation will focus on three key areas of hybrid electric and full electric architectures, ultra-efficient aircraft architectures and disruptive technologies to enable hydrogen-powered aircraft. The targeted performance levels are summarised in Figure 6.1.5<sup>64</sup>.

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<sup>63</sup> Clean Aviation (2021), Council Regulation (EU) 2021/2085 establishing the Joint Undertakings under Horizon Europe.

<sup>&</sup>lt;sup>64</sup> Clean Aviation (2024), <u>Strategic Research & Innovation Agenda</u>.

Aircraft Category	Key technologies and architectures to be validated at aircraft level in roadmaps	Entry Into Service Feasibility	CO <sub>2</sub> Emissions reduction (technology based) <sup>28</sup>	Net CO <sub>2</sub> Emissions reduction (i.e. including SAF effect) <sup>29</sup>	Current share of air transport system emissions
Regional Commercial Aircraft	> Hybrid-electric (SAF + Batteries) coupled with highly efficient aircraft configuration	~2035	-30%	-86%	~5%
	> Same with H2-electric power injection (Fuel Cells electric generation)	Beyond 2035	Up to -50%	Up to -90%	
Short-Medium Range Commercial Aircraft	Advanced ultra-efficient aircraft configuration and ultra-efficient gas turbine engines	~2035	-30%	-86%	~50%
Hydrogen- Powered Commercial Aircraft	Full hydrogen-powered aircraft (H2 Fuel Cells or H2-combution)	~2035	-100%	N/A	N/A

- 28. Improvement targets are defined as CO2 reduction compared to 2020 state-of-the-art aircraft available for order/delivery.
- 29. Assumes full use of SAF at a state-of-the-art level of net 80% carbon footprint reduction (and where applicable, zero-carbon electric energy for batteries charging and green hydrogen production).

Figure 6.1.5 Clean Aviation Targets



Figure 6.1.6 Initial projects launched in 2023 to deliver important technology bricks in all three areas

#### STAKEHOLDER ACTIONS

# AeroSpace and Defence Industries Association of Europe (ASD)



ASD includes 25 major European companies and 25 National Associations as our members, with an overall representation of up to 4,000 companies across 21 European countries. In 2022, ASD Members employed 921,000 people and generated a turnover of €261 billion.

# <u>UltraFan</u>® Technology Demonstrator

Rolls-Royce has successfully run its UltraFan® technology demonstrator to maximum power during 2023. The initial stage of the test was conducted using 100% Sustainable Aviation Fuel (SAF). UltraFan® delivers a 10% efficiency improvement over the Trent XWB engine and a 25% efficiency gain since the launch of the first Trent engine. Testing has been supported by various partners, including the EU Clean Sky programmes.



#### **Hydrogen Fuel Cells**

Airbus has performed ground testing to achieve the milestone of running a fuel cell engine concept at full power (1.2 MegaWatts). This is the most powerful fuel cell test ever in the aviation sector, coupling 12 fuel cells to reach the output needed for commercial use. In addition, the Non-Propulsive Energy demonstrator, HyPower, will use a fuel cell containing ten kilograms of gaseous hydrogen generated from renewable sources to produce electricity when tested on board an Airbus A330 in standard operating conditions. It aims to reduce the



emissions of CO<sub>2</sub>, NO<sub>X</sub> and noise levels associated with a traditional APU.

#### **RISE** Open Fan

SAFRAN is developing the CFM RISE Open Fan engine demonstrator combining lightweight equipment and advanced technologies such as hybrid electric systems. An open fan architecture has the potential to reduce fuel consumption and  $\rm CO_2$  emissions by more than 20% compared to today's most efficient engines. This advanced, new generation open fan architecture is expected to be able to fly at the same speed as current single-aisle aircraft (up to Mach 0.8) with a noise signature that will meet anticipated future regulations.



Flight testing of the RISE Open Fan is being done in collaboration with Airbus using their A380 Flight Test Demonstrator that aims to mature and accelerate the development of advanced propulsion technologies. The programme objectives include enhanced understanding of engine/wing integration and aerodynamic performance as well as propulsive system efficiency gains, evaluating acoustic models, and ensuring compatibility with 100% Sustainable Aviation Fuels.



## 6.2 Sustainable Aviation Fuels

- ReFuelEU Aviation sets minimum supply mandate for Sustainable Aviation Fuels (SAF) in the EU, starting with 2% in 2025 and increasing to 70% in 2050.
- A sub-mandate for synthetic aviation fuels, starting at 0.7% in 2030 and increasing to 35% in 2050, underlines their significant potential for emissions reductions.
- All SAF supplied under the ReFuelEU Aviation mandate must comply with the sustainability and greenhouse gas emissions saving criteria as set out in the Renewable Energy Directive (RED) and the revised Gas Directive.
- The ICAO CAAF/3 conference agreed in 2023 on a global aspirational vision to reduce CO<sub>2</sub> emissions from international aviation by 5% in 2030 through the use of SAF, low-carbon aviation fuels and other aviation cleaner energies.
- As of 2024, SAF production represented only 0.53% of global jet fuel use. Significant expansion of production capacity is required to meet future mandates and goals.
- SAF must meet international standards to ensure the safety and performance of aviation fuel. Various types of SAF have been approved, with ongoing efforts to increase blending limits and support the use of 100% drop-in SAF by 2030.
- SAF have the potential to offer significant CO<sub>2</sub> and non-CO<sub>2</sub> emissions reductions on a lifecycle basis compared to conventional jet fuels, primarily achieved during the production process using sustainable feedstock. However, various factors such as land use changes can negatively impact the overall lifecycle emissions.
- The upscaling of SAF has generated concerns about potential fraudulent behaviour whereby products labelled as meeting RED sustainability requirements are not compliant.
- Various measures have been put it place to support the achievement of European and ICAO goals on SAF, including a European Clearing House, financial incentives, research programmes and international cooperation.
- SAF production capacity currently under construction could supply the 3.2 Mt of SAF required under ReFuelEU Aviation in 2030, but would be required to ramp up quickly thereafter.
- SAF prices are currently 3 to 10 times more expensive than conventional fuel although they are expected to reduce substantially as production technologies scale up.

#### 6.2.1 SAF Developments

The last few years have seen significant developments in the European sustainable aviation fuels landscape. With the adoption of the ReFuelEU Aviation Regulation 65, European legislators are ensuring a

<sup>&</sup>lt;sup>65</sup> European Commission (2023), <u>Regulation (EU) 2023/2405 of the European Parliament and of the Council of 18 October 2023</u> on ensuring a level playing field for sustainable air transport (ReFuelEU Aviation)

level playing field for sustainable air transport by establishing minimum mandates for fuel suppliers starting in 2025, including sub-mandates for e-fuels. Together with a growing number of initiatives and mandates outside of Europe, the market is now at a pivotal point and an ambitious increase of production capacity will be required to meet this mandate.

#### 6.2.2 What are Sustainable Aviation Fuels?

A Sustainable Aviation Fuel (SAF) is a sustainable, non-conventional, alternative to fossil-based jet fuel. Several definitions and terminology apply, depending on regulatory context, feedstock basis, and production technology.

According to the ReFuelEU Aviation Regulation, SAF are defined as various types of drop-in aviation fuels (Figure 6.2.1). For instance, aviation biofuels mean biofuels as defined in the Renewable Energy Directive (RED)<sup>66</sup> and excluding fuels produced from food and feed crops as well as other feedstock specified in Article 4 of the Regulation. Finally, for synthetic aviation fuels, a variety of terminologies are used, such as liquid Renewable Fuels of Non-Biological Origin (RFNBO) in ReFuelEU Aviation, but also Electrofuels. e-Fuels and Power-to-Liquid (PtL).

Both ReFuelEU Aviation and the EU Emission Trading System (ETS) use the RED as their basis and all eligible fuels need to comply with the sustainability and greenhouse gas (GHG) emissions reduction criteria set out in the RED.

Type of ReFuelEU Aviation fuel	Definition in RFEUA Article	Comments				
Categories of sustainable aviation fuels (SAF)						
Synthetic aviation fuels	Art 3(12)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001				
Advanced aviation biofuels	Art 3(8)(a)	Produced from the feedstock listed in Part A Annex IX of Directive (EU) 2018/2001				
Aviation biofuels	Art 3(8)(b)	Produced from feedstock listed in Part B Annex IX of Directive (EU) 2018/2001				
Other aviation biofuels	Art 3(8)(c)	Produced from feedstock not listed in Annex IX of Directive (EU) 2018/2001 and except for those produced from food and feed crops				
Recycled carbon aviation fuels	Art 3(9)	Produced from waste streams of non-renewable origin which are not suitable for material recovery				
Categories of other eligible r	enewable and lo	w-carbon aviation fuels under RFEUA				
Low-carbon hydrogen for aviation	Art 3(15)	Produced from non-fossil non-renewable sources				
Renewable hydrogen for aviation	Art 3(16)	Renewable fuel of non-biological origin in Directive (EU) 2018/2001				

<sup>&</sup>lt;sup>66</sup> EU (2018), <u>Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of</u> the use of energy from renewable sources (Text with EEA relevance.).

Synthetic low-carbon aviation fuels	Art 3(13)	Produced from non-fossil non-renewable sources		
Other aviation fuels under RFEUA				
Conventional aviation fuel Art 3(14)		Aviation fuels produced from fossil non-re- newable sources of hydrocarbon fuels (e.g. crude oil)		

Figure 6.2.1 ReFuelEU Aviation fuel categories

Standardisation process for qualification of new SAF production pathways: The reliable performance of aviation fuel is essential to the safe operation of aircraft and is a matter of airworthiness requiring harmonised international practices. What is commonly referred to as "aviation turbine fuel", is a highly specified technical material, characterised by many chemical and physical properties defined by technical specifications, such as the ASTM D1655 and DEF STAN 91-091<sup>67</sup> <sup>68</sup>. These specifications are developed and maintained by ASTM International and United Kingdom Ministry of Defence (UK MOD) respectively, with support from stakeholder groups such as Original Equipment Manufacturers (OEMs), fuel producers, fuel suppliers, airline operators and regulatory bodies. These fuel standards list the requirements for Jet A/Jet A-1, which is aviation turbine fuel for use within gas turbine engines.

Qualified production pathways are listed in ASTM D7566<sup>69</sup>, which sets out the standard specification for "aviation turbine fuel containing synthesized hydrocarbons", meaning fuels that are of non-conventional origin. Each type of production pathway is defined in terms of feedstock, conversion technology, fuel specification properties, and maximum blending fraction. After fulfilling blending requirements in ASTM D7566 Table 1 the fuel is redeclared and treated as an ASTM D1655 Jet A/Jet A-1 fuel.

As of October 2024, eight SAF production processes have been standardized by ASTM and consequently been adopted by other fuel standards <sup>70</sup>. In addition, three pathways for the co-processing of renewable feedstocks in petroleum refineries are qualified<sup>71</sup> with a feedstock blending limit of up to 24%.

Production pathway	Feedstocks <sup>1</sup>	Certification name	Maximum SAF share
Biomass Gasification + Fischer-Tropsch (Gas+FT)	Energy crops, lignocellulosic biomass, solid waste	FT-SPK <sup>2</sup>	50%
Hydroprocessed Esters and Fatty Acids (HEFA)	Vegetable and animal fat	HEFA-SPK	50%
Direct Sugars to Hydro- carbons (DSHC)	Conventional sugars, lignocellulosic sugars	HFS-SIP <sup>3</sup>	10%4
Biomass Gasification + FT with Aromatics	Energy crops, lignocellulosic biomass, solid waste	FT-SPK/A⁵	50%

<sup>&</sup>lt;sup>67</sup> ASTM (2021) D1655, 2021, Standard Specification for Aviation Turbine Fuels. DOI: 10.1520/D1655-21C.

<sup>69</sup> ASTM (2021), <u>D7566</u>, <u>2021</u>, <u>Standard Specification for Aviation Turbine Fuel Containing Synthesized Hydrocarbons</u>. <u>DOI:</u> <u>10.1520/D7566-21</u>.

<sup>68</sup> Ministry of Defence (2024), DefStan 91-091 Issue 17

<sup>&</sup>lt;sup>70</sup> ASTM (2021), <u>D7566, 2021, Standard Specification for Aviation Turbine Fuel Containing Synthesized Hydrocarbons. DOI:</u> 10.1520/D7566-21.

<sup>71</sup> ASTM (2021) D1655, 2021, Standard Specification for Aviation Turbine Fuels. DOI: 10.1520/D1655-21C.

Alcohol to Jet (AtJ)	Sugar, starch crops, lig- nocellulosic biomass	ATJ-SPK	50%
Catalytic Hydrothermolysis Jet (CHJ)	Vegetable and animal fat	CHJ or CH-SK <sup>6</sup>	50%
HEFA from algae	Microalgae oils	HC-HEFA-SPK <sup>7</sup>	10%
AtJ with Aromatics	Sugar, starch crops, lig- nocellulosic biomass	ATJ-SKA	50%
FOG Co-processing	Fats, oils, and greases	FOG	5%
FT Co-processing	Fischer-Tropsch (FT) bi- ocrude	FT	5%
Hydroprocessed Lipids Co-processing	Hydroprocessed vegeta- ble oils, animal fats, used cooking oils	Hydroprocessed Lipids Co-processing	10%

<sup>&</sup>lt;sup>1</sup> The listed feedstocks are technologically feasible for the specific production pathway, but not necessarily applicable under certain regulations (e.g. ReFuelEU Aviation).

Figure 6.2.2 Drop-in SAF qualified production pathways

In order to be included in ASTM D7566, novel SAF production pathways need to go through a thorough qualification process specified in ASTM D4054<sup>72</sup>. This process includes the testing of fuel samples, ranging from small-scale laboratory tests with a limited amount of fuel to full rig- and engine-testing that requires thousands of litres. The resulting research reports are then reviewed and approved by the OEMs before being proposed as ballot for inclusion of a new Annex to ASTM D7566. This is both expensive and time-consuming for all involved stakeholders, which has led to the setup of several SAF Clearing Houses to support this process.

<sup>&</sup>lt;sup>2</sup> FT-SPK: Fischer-Tropsch synthesised paraffinic kerosene.

<sup>&</sup>lt;sup>3</sup> HFS-SIP: hydroprocessed fermented sugars to synthetic iso-paraffins.

<sup>&</sup>lt;sup>4</sup> TRL 7-8 for conventional sugar feedstock; TRL 5 for lignocellulosic sugar feedstock.

<sup>&</sup>lt;sup>5</sup> FT-SPK/A: Fischer-Tropsch synthesised paraffinic kerosene with Aromatics.

<sup>&</sup>lt;sup>6</sup> CH-SK: catalytic hydrothermolysis synthesised kerosene.

<sup>&</sup>lt;sup>7</sup> HC-HEFA-SPK: Synthesised paraffinic kerosene from hydrocarbon-hydroprocessed esters and fatty acids.

<sup>&</sup>lt;sup>72</sup> ASTM (2021), <u>ASTM D4054, 2021, Standard Practice for Evaluation of New Aviation Turbine Fuels and Fuel Additives. DOI:</u> 10.1520/D4054-21A.

EU SAF Clearing House: The EU SAF Clearing House<sup>73</sup>, which is funded by the EU and managed by EASA, is a 'one stop' knowledge centre providing all the information, data and stakeholder connections needed by fuel producers seeking to advance through the ASTM qualification process described above and contribute to the production and supply of sustainable aviation fuels.

Each of the approved SAFs within the ASTM D7566 Annexes has its own characteristics and is tapping into certain categories of feedstock. To be able to produce enough SAF to meet the future needs of the aviation sector, more pathways that tap into new feedstock that have good sustainability characteristics and are economically viable, are required.



There is substantial work being done within fuel standard committees to increase the blending limits for both SAF and the co-processing of renewable feedstock in conventional refineries. For the latter, there are ambitions to increase the limit to 30% by 2025 as the existing infrastructure can be immediately deployed to increase the sustainable share in aviation fuels and support fulfilling the mandates without requiring major investments. The research work required to remove the blending limit and enable the use of 100% SAF is ongoing.

Two Options for 100% SAF: Drop-in and Non-Drop-in: The Approved SAF currently have associated maximum blending ratios (Figure 6.2.2) that may limit the ability to use larger amounts of SAF in the future. As such, dedicated task groups within fuel standard committees are assessing two options to facilitate the use of 100% SAF in aircraft with an initial timeline of having fuel standards ready by latest 2030:

- 100% Drop-In SAF: Jet Fuel Fully Comprised of Synthesized Hydrocarbon as a drop-in replacement which is identical to Jet A/Jet A-1
- 100% Non-Drop-In SAF: Non-Drop-In Fully Synthetic Aviation Jet Fuel is aromatic free fuel, which is close to Jet A/Jet A-1 but would be a different fuel.

The 100% Drop-In SAF will be a modification to the existing ASTM D7566. One option to realize such a fuel is to blend two or more SAFs to produce a fuel with characteristics that are fit for purpose in terms of 100% use. Another option is the adaptation of currently used raw materials and production processes to produce a fully formulated 100% SAF in a single process stream (e.g. AtJ, FT- SPK/A and CHJ) or the use of new raw materials and processes yet to be developed and approved. In the last two years, the successful use of 100% Drop-In SAF was demonstrated in experimental flights by different commercial airlines in tight cooperation with OEMs and airworthiness authorities.

The 100% Non-Drop-In SAF would be a new fuel standard specification. It could be used in designated aircraft/engines only and would require a separate supply chain. A major motivation for this new fuel type would be to significantly reduce emissions that contribute to non-CO<sub>2</sub> climate impacts and local air quality. For (non-aromatic) 100% Non-Drop-In SAFs a series of research and test flights proved their positive effects on emissions and contrail formation. Furthermore, valuable data was collected that will support the specification of a 100% Non-Drop-In SAF.

A collaborative effort across the aviation ecosystem aims to maximize global impact, with standardiza-

<sup>&</sup>lt;sup>73</sup> European Union (2024), <u>EU SAF Clearing House</u>

tion and technical readiness currently in progress. Ongoing impact analysis focuses on fuel production, while further studies are necessary to address infrastructure challenges associated with 100% Non-Drop-In SAF.

With a variety of feedstock categories that can be used to produce SAF, the production can be tailored to the specific circumstances of a country and thereby support diversification of fuel supplies. Four of the production pathways that are expected to play a major role in the future are Hydroprocessed Esters and Fatty Acids (HEFA) (TRL<sup>74</sup> 8-9), Alcohols to Jet (AtJ) (TRL 7-8), Biomass Gasification with Fischer-Tropsch (Gas+FT)

(TRL 6-8) and Power-to-Liquid (PtL) (TRL 5-8). New production pathways and suitable feedstocks are being developed. Methanol-to-Jet is one promising technology that is being worked on by several companies and is currently going through the qualification process. The advantage of this pathway is that it can be used both with biomass feedstock as well as a conversion technology for Power-to-Liquid fuels.

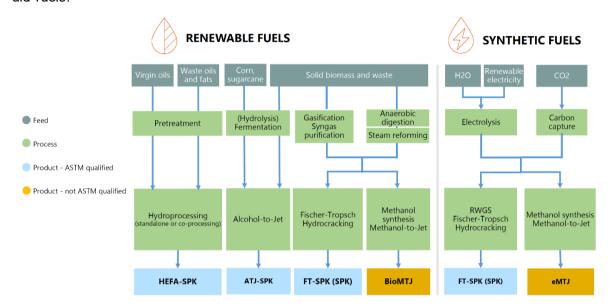


Figure 6.2.3 Main SAF production pathways with similar building blocks <sup>75</sup>

Hydroprocessed Esters and Fatty Acids (HEFA): Currently the most viable option to produce SAF due to its commercial and technical maturity. Feedstocks include waste and residue fats, such as vegetable oil, used cooking oil, and animal fats, as well as purpose-grown crops like jatropha and camelina. These feedstocks are processed with hydrogen to remove oxygen and create hydrocarbon fuel components. However, supply will be limited by the availability of sustainable feedstock and competition from other sectors, such as road. In addition, with growing demand there is a risk of potential fraud from the use of feedstock that does not comply with the sustainability criteria (see Textbox on Sustainable Certification Schemes).

Alcohols to Jet (AtJ) and Biomass Gasification with Fischer-Tropsch (Gas+FT): AtJ fuels can be produced from agricultural residues and crops and the renewable fraction of municipal waste via an alcohol synthesis. Gas+FT converts biogas or syngas from similar feedstocks into fuel. Both methods can be produced with or without aromatics. Aromatics are essential for the performance of certain aircraft engine components (e.g. seals) but have environmental drawbacks in terms of particulate matter emissions. On the other hand, the production with aromatics would enable future 100% drop-in SAF production (see textbox) once the two pathways develop and are commercially available in the EU for aviation fuel production.

<sup>74</sup> Technology Readiness Level.

<sup>&</sup>lt;sup>75</sup> Renewable and Low-Carbon Fuels Value Chain Industrial Alliance (2024)

Power-to-Liquid (PtL): These fuels offer one of the highest potentials to scale-up production capacity in the future. While not being limited by sustainable biomass availability, they are reliant on access to sufficient additional renewable energy electricity, and an energy efficient conversion process, to achieve significant  $CO_2$  emission reductions. Water and electricity are used in an electrolyser to generate hydrogen, which is then combined with  $CO_2$  to create syngas. This syngas can then be further converted to SAF via the Fischer-Tropsch (FT) pathway or the Methanol-to-Jet pathway (currently in the ASTM D4054 qualification process). The  $CO_2$  required for the PtL process can be obtained from industrial waste gases, biomass, or direct air capture (DAC). With DAC, the  $CO_2$  is directly captured from the air through filters. As the concentration of  $CO_2$  in the air is low, this process is very energy intensive but offers high  $CO_2$  emission reduction potential, once the technology has further matured.

#### 6.2.3 How sustainable are SAF?

Sustainability criteria: Figure 6.2.4 provides an overview of the sustainability criteria used within both the RED<sup>76</sup> and the ICAO Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)<sup>77</sup>.

Scheme	Sustainability criteria
Renewable Energy Di- rective (2023), Article 29	• GHG reductions – GHG emissions on a life cycle basis from biofuels must be lower than from the fossil fuel they replace (fossil fuel baseline = 94 g CO₂e/MJ): at least 50% lower for installations older than 5 October 2015, 60% lower for installations after that date and 65% lower for biofuels produced in installations starting operation after 2021. For renewable fuels from non-biological origin, and recycled carbon fuels, the savings shall be at least 70%.
	<ul> <li>Land use change – Carbon stock and biodiversity: raw materials for biofuels production cannot be sourced from land with high biodiversity or high carbon stock (i.e., primary and protected forests, highly biodiverse grassland, wetlands and peatlands). Other sustainability issues covered by the reporting obligation are set out in the Governance regulation [10] and can be covered by certification schemes on a voluntary basis. There are also constraints on forest management.</li> </ul>
	<ul> <li>There are additional criteria that are applicable and ensure that electricity used for the production of renewable hydrogen and RFNBOs is of re- newable and additional origin.</li> </ul>
	<ul> <li>There are also limitations on biomass production from feedstocks with high indirect land use change (ILUC) risk and using feedstock that could otherwise be used for food, in order to prevent inappropriate land usage and risk to food security.</li> </ul>
CORSIA Sustainability Cri-	For batches produced on or after 1 January 2024, the following Sustainability Criteria are applicable:
teria for COR- SIA eligible	GHG reductions – CORSIA eligible fuel / SAF must achieve net GHG emissions reductions of at least 10% compared to the baseline life-cycle emissions values for aviation fuel on a life cycle basis (fossil fuel baseline).

<sup>&</sup>lt;sup>76</sup> EU (2018), <u>Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (Text with EEA relevance.)</u>

<sup>77</sup> ICAO (2021), CORSIA Sustainability Criteria for CORSIA Eligible Fuels.

fuels (November 2022)

- = 89 g CO<sub>2</sub>e/MJ), including an estimation of ILUC and/or DLUC emissions.
- Carbon Stock CORSIA eligible fuel / SAF will not be made from biomass obtained from land converted after 1 January 2008 that was primary forest, wetlands, or peat lands and/or contributes to degradation of the carbon stock in primary forests, wetlands, or peat lands as these lands all have high carbon stocks.
- Permanence The emissions reductions attributed to CORSIA SAF should be permanent. Practices will be implemented that monitor, mitigate and compensate any material incidence of non-permanence resulting from carbon capture and sequestration (CCS) activities.

There are additional criteria that are applicable and are addressing the following themes: Water, Soil, Air, Conservation (biodiversity), Waste and chemicals, Human and labour rights, Seismic and Vibrational Impacts, Human and labour rights, Land use rights and land use, Water use rights, Local and social development and Food security.

Figure 6.2.4 SAF sustainability criteria

GHG emissions reductions: The emissions reductions from drop-in SAF in a lifecycle analysis (LCA) are predominately achieved during the production process and more precisely through the use of sustainable feedstock. The greenhouse gases (GHG) emissions in terms of gCO<sub>2</sub>e/MJ from its combustion in an aircraft engine are effectively the same as that those of fossil fuels. Many variables can influence the overall results of the LCA (Figure 6.2.5), but given historic concerns surrounding biofuel sustainability, it is encouraged to calculate actual life cycle emission values rather than applying a default value.

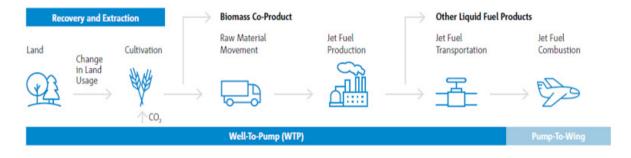


Figure 6.2.5 Components of typical well-to-wing LCA for biofuel-based jet fuel

Overestimations of GHG emissions reductions can occur if potential land use changes are not properly considered. Direct Land Use Changes (DLUC) occur when existing land is converted for the growth of feedstock for biofuel, while Indirect Land Use Change (ILUC) occurs when agricultural land used for food or feed is converted to biofuel production and the displaced production shifts to previously non-agricultural land, such as forests or grasslands<sup>78</sup>. Land use change, both direct and indirectly caused by crop displacements, can potentially negate any GHG savings from biofuels, or even release more CO<sub>2</sub>-equivalent emissions than what the biomass subsequently grown on that land is able to reduce. Wastes and residues are conventionally considered as having zero DLUC or ILUC associated emissions.

<sup>&</sup>lt;sup>78</sup> European Court of Auditors (2023), <u>The EU's support for sustainable biofuels in transport. An unclear road ahead.</u>

The update to the RED in 2023 has tightened the rules around land use, emphasizing the protection of biodiverse areas and placing stricter controls on land conversion, and imposing restrictions on feed-stocks with the higher ILUC risk. Bioenergy production is restricted on lands with high biodiversity value, such as primary forests, highly biodiverse grasslands, and areas designated for nature protection purposes. ReFuelEU Aviation is more stringent than RED by excluding feed and food crops, palm and soy-derived materials, palm fatty acid distillate (PFAD), soap stock and its derivatives as eligible.

Figure 2.3 provides an overview of modelled emissions under CORSIA for approved SAF production pathways as of March 2024, separated into Core LCA and ILUC values. Work is ongoing to approve the methodology for calculating the GHG emissions reductions for Power-to-Liquid fuels, where the main lever for emission reductions is the source of electricity to obtain the hydrogen and the source of carbon, which are both required for PtL fuels.

SAF and non- $CO_2$  emissions: Aviation non- $CO_2$  emissions refer to pollutants other than carbon dioxide ( $CO_2$ ) that have a climate impact, including nitrogen oxides ( $NO_X$ ), aerosol particles (soot and sulphurbased) and water vapour. Some types of SAF have the potential to offer significant non- $CO_2$  emissions reductions  $^{79}$   $^{80}$ .

While it is recognised that aviation non- $CO_2$  emissions contribute to the overall climate impact, these non- $CO_2$  effects are currently only estimated with low confidence and substantial uncertainties. The revised EU ETS Directive requires aircraft operators to monitor and report once a year on the non- $CO_2$  aviation effects.

Research projects, such as AVIATOR and RAPTOR<sup>81</sup> 82 have shown that the use of certain types of SAF could have positive impacts on local air quality<sup>83</sup> due to lower levels of sulphur and aromatic content which contribute to volatile and non-volatile particulate matter (nvPM) emissions. Evidence of contrail reduction when using SAF has been collected and scientifically acknowledged since 2015 (ECLIF I) and further substantiated in the ECLIF II and ND-MAX projects (2018)<sup>84</sup>.

In-flight measurements between 2021 and 2024 during the European ECLIF III and VOLCAN I and II research projects extended the studies by using 100% Drop-In and 100 % Non-Drop-In SAF in both modern rich-burn and learn-burn combustors. These tests demonstrated a significant contrail reduction due to lower nvPM emissions and ice crystal formations, thereby indicating positive effects on climate change mitigation through the use of SAF<sup>85</sup>.



<sup>&</sup>lt;sup>79</sup> Teoh, Roger et al (2022), <u>Targeted Use of Sustainable Aviation Fuel to Maximize Climate Benefits</u>

<sup>80</sup> Märkl, Raphael Satoru et all (2024), Powering aircraft with 100 % sustainable aviation fuel reduces ice crystals in contrails

<sup>81</sup> AVIATOR Project (2024), Assessing aviation emission Impact on local Air quality at airports: Towards Regulation.

<sup>82</sup> RAPTOR (2024), Research of Aviation PM Technologies, modelling and Regulation

<sup>&</sup>lt;sup>83</sup> Lukas Durdina, Benjamin T. Brem, Miriam Elser, David Schönenberger, Frithjof Siegerist, and Julien G. Anet (2021), <u>Reduction of Nonvolatile Particulate Matter Emissions of a Commercial Turbofan Engine at the Ground Level from the Use of a Sustainable Aviation Fuel Blend.</u>

<sup>&</sup>lt;sup>84</sup> Voigt, C. et all (2021), <u>Cleaner burning aviation fuels can reduce contrail cloudiness | Communications Earth & Environment (nature.com)</u>

<sup>&</sup>lt;sup>85</sup> Euractiv (2024), European ECLIF3 flight test study shows significant contrail reduction with 100% SAF

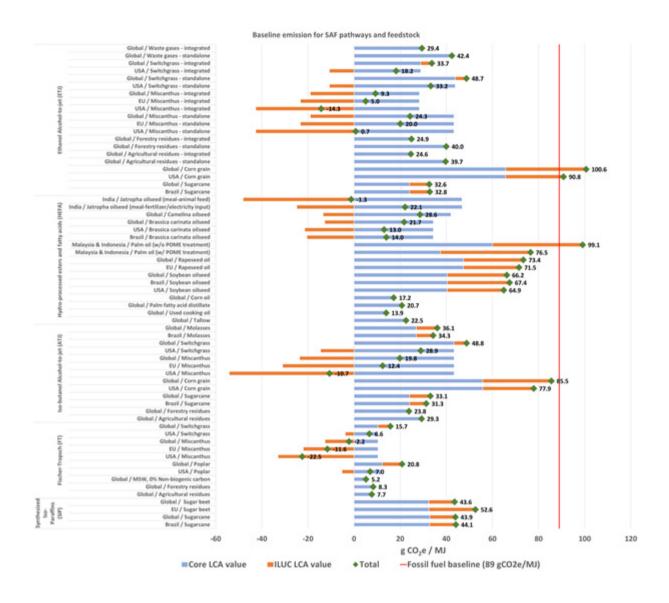


Figure 6.2.6 LCA emissions for CORSIA eligible SAF pathways and feedstock compared to CORSIA fossil fuel reference value (89 g  $\mathrm{CO}_2\mathrm{e}/\mathrm{MJ}$ ) $^{86}$   $^{87}$ 

# Sustainability Certification Schemes - Combatting fraudulent practices.

With so much emphasis being placed on SAF to help reduce aviation emissions, the 'S' in SAF needs to live up to its promise and ensure the effective delivery of emission reductions while avoiding unintended negative environmental and social impacts of its production, thus contributing to the credibility of the sector.

Major regulatory frameworks, such as the EU RED and CORSIA, therefore make use of Sustainability Certification Schemes (SCS). The objective of SCS is to ensure that SAF meet the required sustainability criteria by controlling the compliance with the sustainability requirements along the SAF value chain on a lifecycle basis. Audits are performed by ISO-accredited third-party certification bodies along the complete value chain, from raw material extraction to delivery of SAF to its point of

<sup>&</sup>lt;sup>86</sup> ICAO (2021), CORSIA Supporting Document "CORSIA Eligible Fuels - Life Cycle Assessment Methodology" (Version 3 – March 2021).

<sup>&</sup>lt;sup>87</sup> Two different ATJ conversion plant layouts can be considered. The integrated plant layout assumes co-locating the ATJ process with ethanol production and emissions reductions as a result of heat integration. The standalone configuration assumes that ethanol is taken from the market or a separate ethanol production facility.

use. In these audits, the auditor focuses on checking each economic operator's compliance with a defined set of sustainability criteria as well as traceability (Chain of Custody) and life cycle emissions criteria, thus ensuring that SAF is produced in accordance with the relevant regulatory requirements (e.g. as per the EU RED or CORSIA).

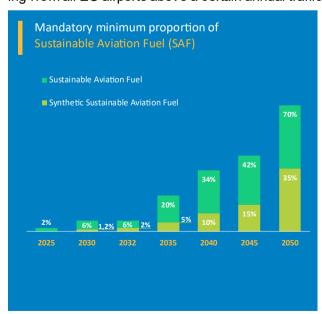
In recent years, SAF and biofuels upscaling has generated growing concerns about the fraudulent trading of non-sustainable feedstock or biofuels in the EU<sup>88</sup> 89. Fraudulent behaviour may ensue whereby products are labelled as meeting sustainability requirements even when they are non-compliant. This is highly problematic insofar as these practices threaten both the effectiveness and credibility of climate and renewable energy policies.

NGOs and European biofuel producers have repeatedly warned against dubious imports and raised concerns about the effectiveness of the certification schemes, which in part led to the development of the EU Union Database that will increase the transparency and reliability of the tracking system of renewable fuels along their supply chains. The Union Database is appropriately integrated in the reporting process of SAF supplied to EU airports under the ReFuelEU Aviation Regulation and the EU ETS Directive.

In response to these concerns, certification schemes have generally increased their efforts to enhance the credibility of the system, including unannounced integrity audits at randomly selected plants and economic operators. As a result, some sustainability certificates were withdrawn or temporarily suspended. They have also put in place a transaction database that is linked with the EU Union Database to prevent the relabelling of sustainability declarations, a mapping tool to support risk identification for auditors, specific guidance materials for waste and residue materials and evaluations of the technical feasibility of processing plants to deal with low-grade advanced waste/residue material<sup>90</sup>.

#### 6.2.4 SAF Policy Actions

ReFuelEU Aviation: The ReFuelEU Aviation Regulation sets out EU-level harmonised obligations on aviation fuel suppliers, aircraft operators and Union airports for scaling up SAF used for flights departing from all EU airports above a certain annual traffic thresholds (passenger traffic above 800,000 or



freight traffic above 100,000 tons). Starting in 2025, aviation fuel suppliers are required to supply a minimum of 2% blend of SAF with conventional fossil-based fuels to Union airports and this gradually increases to at least 70% by 2050. Synthetic aviation fuels are subject to an ambitious sub-mandate, starting with 1.2% in 2030, 2% in 2032 and reaching 35% in 2050 [1]. Aircraft operators departing from EU airports must also refuel with the aviation fuel necessary to operate the flight. This avoids the excessive emissions related to extra weight and minimises the risks of carbon leakage caused by so-called 'economic tankering' practices. Between 2025 and 2034, aviation fuel suppliers can supply the minimum shares of SAF as an average over all the aviation fuel they have supplied across Un-

<sup>&</sup>lt;sup>88</sup> Euractiv (2024), Biofuel certification schemes slammed for failing to halt fraud

<sup>&</sup>lt;sup>89</sup> Argus (2024), Norway says Esso misclassified animal fat biofuels

<sup>90</sup> ISCC (2023), Biodiesel and EU Imports from China

ion airports for that reporting period. This flexibility mechanism allows the industry to develop the production and supply capacity accordingly and the fuel suppliers to meet their obligations in the most cost-effective way without reducing the overall ambition. The Commission's Report will identify and assess the developments on SAF production and supply on the Union aviation fuel market, as well as assess possible improvements or additional measures to the existing flexibility mechanism, such as setting a potential accounting and trading mechanism for SAF (a so-called 'book and claim' system)<sup>91</sup>.

In order to support the achievement of the ReFuelEU Aviation supply mandate, the EU has put in place various regulatory, financial and other supporting measures, including:

- A zero emissions rating of RED-compliant SAF used under the EU Emissions Trading System (ETS);
- A maximum of 20 million extra ETS (with an estimated value of €1.6 billion) allowances will be allocated to aircraft operators during 2024 to 2030 for the uplifting of SAF to also cover part of, or all of the price difference with fossil kerosene, depending on the type of SAF and the uplift location;
- A fuel tax structure under the proposed revision of Energy Taxation Directive that would incentivise SAF over fossil kerosene through preferential tax rates;
- A flight emissions label laying down harmonized rules for the estimation of airline emissions taking into account SAF uptake;
- The inclusion in the EU Taxonomy of SAF production and uptake to improve access to green finance:
- R&D and deployment financing support under Horizon Europe, Innovation Fund, InvestEU programmes to de-risk SAF production at all technology maturity stages;
- The accelerated qualification of new SAF technologies and approval of new production plants through creation of EU SAF Clearing House and inclusion of SAF in the Net Zero Industry Act proposal;
- Cross-sectoral cooperation in the Renewable and Low-Carbon Fuels Value Chain Industrial Alliance (RLCF Alliance). The RLCF Alliance, as the industrial pillar of ReFuelEU Aviation to support SAF supply, and emergence of SAF projects and match-making with potential fuel offtakers, is open to all stakeholders.
- EU-funded international cooperation SAF projects with partner States in Africa, Asia, Latin America and the Caribbean. This includes a €4 million ACT-SAF project to conduct feasibility studies and capacity building activities.
- Designation of SAF as a 2024 Global Gateway Flagship initiative, supporting the development, production and use of SAF by de-risking SAF investments outside Europe via different types of funding.
- International cooperation at ICAO level, including the EU's role in the negotiations to reach an agreement at CAAF/3 in November 2023.

## ICAO Conference on Aviation Alternative Fuels (CAAF/3)

The third ICAO Conference on Aviation Alternative Fuels (CAAF/3) was held in November 2023, during which ICAO Member States agreed on the ICAO Global Framework for SAF, Lower Carbon Aviation Fuels (LCAF) and other Aviation Cleaner Energies. This includes a collective global aspirational vision to reduce CO<sub>2</sub> emissions from international aviation by 5% in 2030 with the increased production of



<sup>91</sup> EUROCONTROL (2024), <u>Use of sustainable aviation fuels in European States (ECAC) and airports</u>

SAF, LCAF and other initiatives<sup>92</sup>. Building blocks in terms of policy and planning, regulatory framework, implementation support and financing will be key in achieving this goal. The vision will be continually monitored and periodically reviewed, including through the convening of CAAF/4 no later than 2028, with a view to updating the ambition on the basis of market developments in all regions.

The ReFuelEU Aviation Regulation also foresees a thorough monitoring and reporting system of SAF supply and usage that will provide an overview of the European SAF market and form part of future editions of this report. This reporting is linked with an enforcement mechanism consisting of penalties imposed by Member States for the cases of non-compliance from fuel suppliers and aircraft operators.

First in 2027 and every four years thereafter, the European Commission will present a detailed assessment of the SAF market and the possible need to revise the scope of the Regulation, the eligible fuels, the minimum shares and the level of fines for non-compliance. It will also include an assessment of possible support mechanisms for production and uptake of SAF.

ECAC States policy actions: Switzerland set out a SAF strategy with the goal that SAF shall contribute a minimum of 60% to net  $CO_2$  reductions in Swiss civil aviation by 2050, contributing to the Swiss goal of reaching net-zero  $CO_2$  emissions in 2050. It is accompanied by a legislative proposal that includes a blending mandate and provision of funding for the development of SAF production pathways, planned to enter into force in 2025. To avoid market distortion, the mandate shall be aligned with ReFuelEU Aviation. Turkey is also planning to develop dedicated SAF regulations to incentivize its uptake  $^{93}$ . The United Kingdom SAF policy includes a SAF Mandate to drive an ambitious ramp-up of SAF in the aviation fuel supply, starting with 2% in 2025, increasing linearly to 10% in 2030 and reaching 22% in 2040. The Mandate includes a cap on the amount of HEFA SAF used to meet obligations, and there is a separate obligation for power-to-liquid fuels, starting in 2028 with 0.2% of the total fuel supply and reaching 3.5% in  $2040^{94}$ .

#### 6.2.5 SAF Market

Global SAF production represented only 0.53% of jet fuel use in 2024, up from 0.2% in 2023<sup>95</sup> <sup>96</sup> <sup>97</sup>. The EU SAF market, incentivized following the adoption of the ReFuelEU Aviation Regulation and the revision of the EU ETS and the RED, is now in a transition phase. The regulation requires a significant expansion of the production capacity in order to avoid the EU market becoming overly reliant on imports. Starting in 2025, fuel suppliers are mandated to supply a growing amount of SAF to Union airports. EASA is tasked with monitoring and reporting under the regulation and will produce annual reports, which will include a status of the evolving SAF market.

Current and future SAF production capacity: According to information collated with the support of Re-FuelEU Aviation Member State Network (Figure 6.2.7), established by EASA to support the implementation of the Regulation, the current annual SAF production capacity in the EU is just above 1 million tonnes (Mt). Almost all this SAF production is HEFA and does not account for co-processing production using sustainable feedstock in fossil fuel plants, for which there is not enough reliable information. This could be considered to be an 'operating scenario'.

<sup>92</sup> ICAO (2023), ICAO Global Framework for SAF, LCAF and other Aviation Cleaner Energies

<sup>93</sup> ECAC Guidance on Sustainable Aviation Fuels (SAF) (2023), European Civil Aviation Conference

<sup>&</sup>lt;sup>94</sup> Department for Transport (2024), Aviation fuel plan

<sup>95</sup> Simple Flying (2024), IATA Says SAF Production Will Reach 0.53% of Aviation 2024 Fuel Usage

<sup>&</sup>lt;sup>96</sup> EUROCONTROL (2024), Use of sustainable aviation fuels in European States (ECAC) and airports

<sup>97</sup> Transport and Environment (2024), How is e-kerosene developing in Europe?



Figure 6.2.7 Projected EU SAF facilities in 2030 under the Optimistic scenario

If facilities that are currently under construction are taken into account, the amount of SAF production capacity in 2030 could reach 3.5 Mt. This could be considered a 'realistic scenario'. Again, almost all this production would be dominated by the HEFA production pathway and does not include any Power-to-Liquid (PtL) production, as no plant has yet evolved beyond a pilot stage. Other studies come to different conclusions, mostly due to a different set of assumptions and methodologies. The recent SkyNRG Market Outlook from June 202498 estimates 3.8 Mt by 2030, including 0.3 Mt of PtL as well as some co-processing production, while IEA predicts roughly 3.8 Mt by 203899. In both cases, a significant acceleration in the construction of PtL plants will be needed to meet the first sub-mandate of 0.7% in 2030.

In addition to the operating and realistic scenarios, both the ReFuelEU Aviation Member State Network and the SkyNRG Market Outlook collected information to build up an 'optimistic scenario'. This includes all projects in the pipeline to be in operation by 2030 and includes PtL projects, leading to a projected SAF capacity of 5.9 Mt and 5.5 Mt respectively.

Figure 6.2.8 illustrates all of the above scenarios out to 2030. While the realistic scenario (3.5 Mt) would be able to meet the projected demand of the 6% mandate by 2030 (2.8 Mt), significant growth in production capacity is required to fulfil the very ambitious ramp-up to 20% in the subsequent 2030-2035 period.

<sup>98</sup> SkyNRG (2024), Sustainable Aviation Fuel Market Outlook – June 2024 Update

<sup>&</sup>lt;sup>99</sup> International Energy Agency (2023), Renewables 2023 Analysis and forecast to 2028

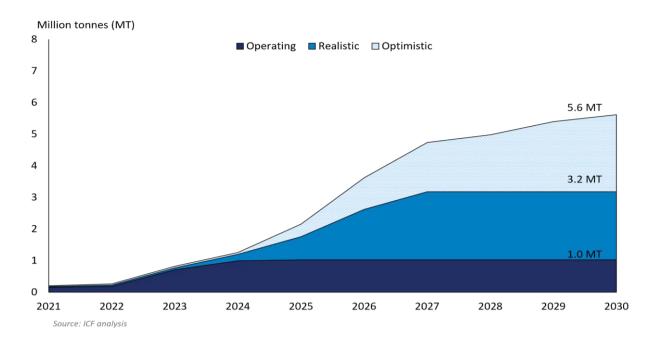


Figure 6.2.8 Projected EU SAF capacity in 2030 by scenario

Beyond 2030, projections of production capacity are more challenging and the potential SAF production will depend on the availability of feedstocks (e.g. HEFA, green hydrogen, renewable energy). The aviation industry will be competing with other sectors as part of the economy wide decarbonization efforts where these feedstocks could be used to directly decarbonize the primary energy supply. As a result, securing these sources of renewable energy will be critical to ensure the ramp-up of PtL SAF production within Europe. There are positive signals in particular from the solar industry, where the growth of global installation capacity is accelerating faster than anticipated and becoming the largest source of new electricity, with solar capacity doubling every three years and hence growing ten-fold every decade<sup>100</sup>. Overall, renewable energy passed 30% of the total global energy supply for the first time in 2023<sup>101</sup>. By the 2030s, solar energy is likely to become the biggest source of electrical power and by the 2040s it may be the largest source of all energy<sup>102</sup>.

Another limiting factor for SAF deployment towards 2050 is the capital expenditure required to build the production facilities. It is estimated that between 500-800 SAF facilities<sup>103</sup> will be needed globally by 2050, which, assuming €1.8 billion per facility, would result in around €36 billion capital expenditure annually between 2025 and 2050<sup>104</sup>.

Estimations of the future SAF landscape have concluded that indeed PtL fuels have the potential to cover 50% of the global SAF production capacity by 2050. Whereas HEFA production will be around 7% and AtJ / FT the remaining 43%. Projections by region also highlight the varying availabilities for feedstocks in the different parts of the world <sup>105</sup>.

 $CO_2$  emissions reductions: To estimate the potential  $CO_2$  emission savings from the ReFuelEU Aviation Regulation, a comparison has been made between the carbon intensity reduction of global aviation fuel taking into account the SAF supplied and the EU RED fossil fuel baseline intensity of 94 g $CO_2$ e/MJ.

<sup>&</sup>lt;sup>100</sup> The Economist (2024), The exponential growth of solar power will change the world

<sup>&</sup>lt;sup>101</sup> The Guardian (2024), Renewable energy passes 30% of world's electricity supply

<sup>&</sup>lt;sup>102</sup> The Economist (2024), <u>The exponential growth of solar power will change the world</u>

 $<sup>^{103}</sup>$  Assuming 0.3 – 0.5 Mt average SAF output per year per facility

<sup>104</sup> SkyNRG (2024), Sustainable Aviation Fuel Market Outlook - June 2024 Update

<sup>105</sup> ICF (2021), Fuelling Net Zero – How the aviation industry can deploy sufficient sustainable aviation fuel to meet climate ambitions. An ICF Report for ATAG Waypoint 2050

Two scenarios were assessed, a 'minimum' emissions saving and a more 'ambitious' scenario. The scenarios differ in the assumed emission reductions achieved by the (advanced) biofuels mandate and the RFNBO (PtL) fuel sub-mandate. The minimum scenario assumes a 65% and 70% emission reduction for biofuels and RFNBOs over their lifecycle respectively, which aligns with the minimum requirements set out in the ReFuelEU Aviation Regulation. The second, more ambitious scenario assumes 80% and 90% emission reductions respectively for the two SAF types.

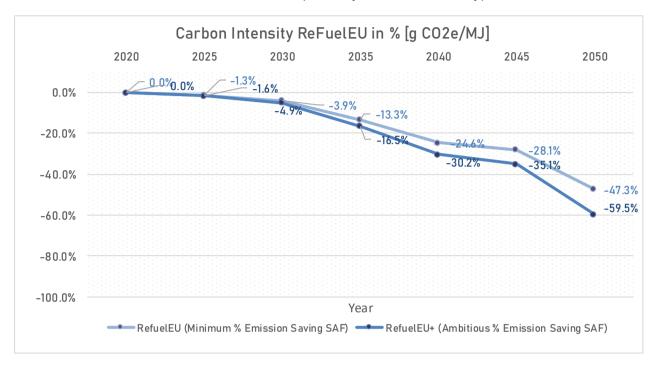


Figure 6.2.9 % CO2eq emissions reductions from the uptake of SAF under ReFuelEU Aviation scenarios

SAF Price: The price of SAF is one of the most critical factors when it comes to its uptake, as fuel costs currently represent a large share of the operational cost of aircraft operators (approx. 30%). In 2023, the price of conventional jet fuel averaged around €816 per tonne and is a figure that is readily available from Price Reporting Agencies (PRA) indexes¹06 ¹07,¹08. When assessing the prices for Re-FuelEU Aviation eligible SAF, a differentiation was made with SAF that are currently available on the market, and SAF for which only production cost estimations can be performed due to the market not being mature enough yet. For the former, only aviation biofuels that are produced from feedstock listed in Part B Annex IX of the Renewable Energy Directive have a market availability in 2023. The average price for these SAF was around €2768 per tonne in 2023, using as a reference the relevant indexes from the PRAs.

For fuels that had no market availability in 2023, production cost estimations were developed based on feedstock, energy and technology deployment costs resulting in prices that range from €1600 per tonne for advanced aviation biofuels to €8700 per tonne for PtL fuels. Figure 6.9 illustrates the estimated price ranges for the different eligible fuels under ReFuelEU Aviation in 2023. These production costs are expected to reduce substantially as emerging SAF and hydrogen production technologies scale up, and associated costs reduce.

<sup>106</sup> IATA (2024), Unveiling the biggest airline costs

<sup>107</sup> Price Reporting Agencies (PRA) used as data source: S&P Global Commodity Insights (Platts), Argus Media and General Index.

 $<sup>^{108}</sup>$  With the density of kerosene of around 0.8 g/cm3, this results in a price of around 1.02 $\in$ /l.

Especially for PtL fuels, for which the energy price is a key cost driver, the differences in energy prices across Europe may play a role in where the production is most attractive and competitive for such fuels in the future<sup>109</sup> <sup>110</sup>.

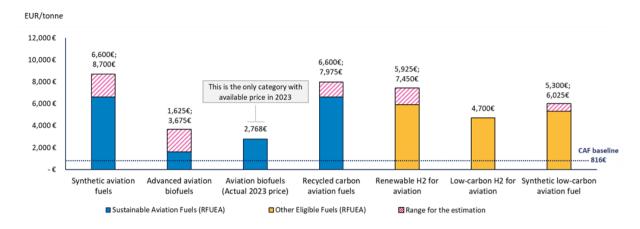


Figure 6.2.10 Estimated prices and production costs in 2023 for ReFuelEU Aviation eligible fuels

<sup>109</sup> EASA (2024), ReFuelEU Aviation Market Report

<sup>&</sup>lt;sup>110</sup> Politico (2024), <u>Franco-German energy cash splash strains EU single market</u>

#### STAKEHOLDER ACTIONS

#### Central Europe Pipeline System: First delivery of SAF

The Central Europe Pipeline System (CEPS)<sup>111</sup> is the largest fuel supply system in NATO and crosses Belgium, France, Germany, Luxemburg and the Netherlands and comprises of approx. 5,300 km of pipeline. It delivers jet fuel to major civil airports such as Frankfurt, Brussels, Luxembourg, Zurich and Schiphol (Amsterdam). Following the permission of NATO, the connected airports have been able to receive SAF blends through CEPS since 2023.

Neste cooperated with Brussels Airlines to deliver sustainable aviation fuel to the airline at Brussels Airport on January 1, 2023. This marked the first time that SAF was supplied to an airline at a European airport using the NATO CEPS. It showcases how existing fuel infrastructure can be used to supply SAF to airports.



#### Delivering CORSIA certified SAF to airlines<sup>112</sup>

In July 2022, Neste delivered the first ever CORSIA certified batch of SAF (Neste MY Sustainable Aviation Fuel™) to American Airlines at San Francisco International Airport in July 2022. This was part of a pilot to certify SAF as a CORSIA Eligible Fuel that can be used by an airline to meet its emissions obligation under the Carbon Offsetting and Reduction Scheme for International Aviation ('CORSIA'), which is a market-based measure to lower CO₂ emissions for international flights and reduce aviation's contribution to climate change.

#### First flight in history with 100% sustainable aviation fuel on a regional commercial aircraft 113

Regional aircraft manufacturer ATR, Swedish airline Braathens Regional Airlines and Neste have collaborated to enable the first ever 100% SAF-powered test flight on a commercial regional aircraft.

The flight took place in Sweden in July 2022 and is part of the 100% SAF certification process of ATR aircraft that started in September 2021.



<sup>111</sup> CIM&CCMP (2024), The CEPS network

<sup>112</sup> Neste (2022), Delivering CORSIA certified SAF to airlines

<sup>&</sup>lt;sup>113</sup> Neste (2022), First flight in history with 100% sustainable aviation fuel on a regional commercial aircraft

#### Bringing together airlines and corporates<sup>114</sup>

Project Runway is an initiative launched by SkyNRG in June 2024 and brings together airlines and corporates to provide easy access to SAF. The project will support airlines in navigating the complexities of SAF procurement and provide an effective way to reduce their greenhouse gas emissions. Project Runway facilitates airlines access to SAF and allows them to share the SAF price premium with ambitious corporates aiming to reduce their own Scope 3 aviation emissions.

#### Modular Power-to-X plants<sup>115</sup>

The modular chemical plants for power-to-X and gas-to-liquid applications developed by INERATEC use hydrogen from renewable electricity and greenhouse gases such as CO<sub>2</sub> to produce, among other products, Power-To-Liquid fuels. The modular approach is being used for the first time in a pioneer plant and large-scale industrial PtL project in Germany. The modular concept of the plants allows scalability over several stages, keeping



the planning and construction efforts manageable and improving the cost-benefit ratio.

# First trans-Atlantic flight on 100% Drop-In Sustainable Aviation Fuel<sup>116</sup>

In 2023, Virgin Atlantic Flight 100 flew on 100% SAF from London to New York, marking the culmination of a year of collaboration to demonstrate the capability of SAF as a safe drop-in replacement for fossil derived jet fuel that is compatible with today's engines, airframes, and fuel infrastructure. Flown on a Boeing 787, using Rolls-Royce Trent 1000 engines, the flight marked a world first on 100% Drop-ln SAF by a commercial airline across the Atlantic. The SAF used was 88% HEFA (Hydroprocessed Esters and



Fatty Acids) made from waste fats and 12% SAK (Synthetic Aromatic Kerosene) made from plant sugars. It is estimated that the use of SAF reduced nvPM emissions by 40% and  $CO_2$  emissions by 64%, as well as an overall improvement in fuel burn efficiency as the SAF produced 1% more energy compared to the same mass of fossil fuel.

<sup>114</sup> SkyNRG (2024), SkyNRG launches Project Runway with Microsoft as a founding member

<sup>115</sup> INERATEC (2023), Groundbreaking for e-fuel production plant in Frankfurt

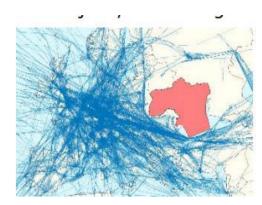
<sup>116</sup> The Guardian (2023), First transatlantic flight using 100% sustainable jet fuel takes off

# 6.3 Air Traffic Management and Operational Improvements

- The Single European Sky (SES2+) proposal of the Commission was formally adopted by the Council and the European Parliament in 2024, althoughonly modest progress was made and various issues were left unresolved.
- Implementation of SES2+, and a focus on continuous improvement to address unresolved issues, is critical to enhance capacity, efficiency and sustainability.
- RP4 (2025-2029) SES performance targets reflect the ambition to enhance environmental performance, as does the desire to develop improved environmental monitoring indicators while building up resilience and strengthening capacity.
- It is recognized that the SES performance scheme needs to be improved in terms of the ATM-related performance indicators for environment. Work is ongoing to identify a more robust KPI which, after a period of monitoring and analysis during RP4, will be ready for performance target setting in RP5.
- Updated SES ATM Master Plan has been aligned with the RP4 ambitions such that ANSPs invest in technologies to provide greener, smarter and more effective air traffic.
- Ambitious environmental performance targets cannot be achieved unless the ATM system supports and incentivises all stakeholders to optimize the efficiency of their operations.
- 400 million tonnes of CO<sub>2</sub> emissions (9.3% less CO<sub>2</sub> per flight) could be saved with the completion of the SES ATM Master Plan vision by 2050.
- The war in Ukraine and the Middle East conflict, and the subsequent impact on EU airspace, has made it more difficult to assess whether ATM actions towards improving environmental performance indicators have resulted in tangible benefits.
- During busy periods, Air Traffic Controllers may need to use alternative procedures to maintain required aircraft separation, thereby limiting the capacity to accommodate fuel efficient Continuous Descent Operations.
- Total gate to gate CO<sub>2</sub> emissions broken down by flight phase indicates that highest emissions originate from cruise phase (62.9%) and climb phase (23.2%).
- The implementation of cross-border, free route airspace (FRA) significantly improves en-route environmental performance. Up to 94,000 tonnes of annual  $CO_2$  emissions are estimated to be saved by 2026 through the Borealis Alliace FRA implementation among 9 States.
- Air traffic control strikes in 2023 had a significant environmental impact with an additional 96,000 km flown and 1,200 tonnes of  $CO_2$  emissions due to knock-on effects across neighbouring States and the wider SES Network.
- SESAR study estimated that €1 invested in Common Project 1 (CP1) ATM functionalities during 2023 resulted in €1.5 in monetizable benefits and 0.6 kg of CO₂ savings, and these benefits are expected to increase overtime as CP1 is fully implemented.

#### 6.3.1 Singe European Sky

In the last few years, air traffic has continued to recover following the COVID pandemic and the number of flights to or from EU27+EFTA airports was 8.35 million during 2023. This is a 8.5% increase compared to 2022 (7.69 million) but still 9.1% below the level of 2019 (9.19 million). Growth rates at the State level have been unevenly distributed due to changes in traffic flows resulting from the war in Ukraine since 2022, changes in holiday traffic and less domestic traffic in several States.



The closure of Ukraine's airspace to commercial traffic was amplified by reciprocal airspace bans for Russian and many Western operators. While most of the European traffic is not directly affected by the airspace closures, east-west flights between Europe and Asia that previously travelled through Russian airspace need to divert, which adds travel time and fuel burn thereby lowering flight efficiency.

In 2004, the Commission launched the Single European Sky (SES)<sup>117</sup> representing a holistic framework to harmonise and improve the performance of Air Traffic Management (ATM) in terms of safety, capacity, cost-efficiency and the environment. The SES builds on five interrelated pillars: economic regulation, airspace organisation/network management, technological innovation, safety and Human Dimension. The SESAR (Single European Sky ATM Research and Development) project is the technological innovation pillar of the SES aiming to modernise ATM through the innovation cycle of defining, developing and deploying innovative technological systems and operational procedures. The goal is to achieve the 'digital European sky' defined in the European ATM Master Plan<sup>118</sup>, which is a common roadmap to establish Europe as the most efficient and environmentally friendly sky in the world. It includes the goal to reduce the average CO<sub>2</sub> emission per flight by 9.3% (600 kg) by 2050. A key element in achieving that is goal is the deployment of Common Project One (CP1)<sup>119</sup>, which facilitate service provision along optimized routes from gate to gate and thereby reduce both CO<sub>2</sub> and non-CO<sub>2</sub> emissions.

The SES has evolved over time and has significantly benefited ATM in Europe. Nevertheless, a profound reform of the SES was considered necessary to more effectively reach the above-mentioned objectives, which led to the Commission launching the 'SES2+' proposal in 2020. The process for adopting the SES2+ was challenging and heavily discussed, but a political agreement was finally reached between the European Parliament and the Council and the new Regulation was adopted in 2024.

While the SES2+ outcome strengthens economic performance regulation and incentivises environmental performance by establishing the Performance Review Body (PRB) on a permanent basis, only modest progress was made and many issues were left unresolved. For example, the Network Manager<sup>120</sup> lacks the means to ensure that ANSPs deliver the promised and much needed capacity to the network when demand from airlines is high. In addition, while SESAR has enhanced coordination between stakeholders through the ATM innovation cycle, the transition from development to deployment

<sup>117</sup> EC (2004), Regulation (EC) No 549/2004 laying down the framework for the creation of the Single European Sky; Regulation (EC) No 550/2004 of the European Parliament and of the Council of 10 March 2004 on the provision of air navigation services in the Single European Sky; Regulation (EC) No 551/2004 of the European Parliament and of the Council of 10 March 2004 on the organisation and use of the airspace in the single European sky (the airspace Regulation)

<sup>118</sup> SESAR (2020), European ATM Master Plan.

<sup>119</sup> EU (2021), Regulation (EU) 2021/116 - Common Project 1 Regulation.

<sup>120</sup> Commission Implementing Decision (EU) 2019/709 [4] renewed the appointment of EUROCONTROL as Network Manager (NM) for the period 2020-2029. EASA continues to act as the competent authority that certifies and oversees the NM. The NM coordinates operational stakeholders in order to manage demand through flow and capacity management, thereby optimising the network performance to limit unnecessary fuel burn and emissions.

of SESAR solutions by ANSPs, airport operators and airspace users across Europe has proven difficult and subsequently led to insufficient progress in modernising the ATM system. This may be due to national requirements in airspace design and security issues, thereby making it complex in identifying universal solutions for monopolistic and state-owned Air Navigation Service Providers (ANSPs). All these points could contribute to challenges in terms of adopting technological innovation, responsiveness to demand and cost base adjustments, and cooperation between ANSPs.

The goal of climate neutrality by 2050 calls for the EU to ensure decarbonisation of the air transport sector. Likewise, the Zero Pollution Action Plan includes goals for reducing impacts from noise and air quality. Ambitious targets such as these cannot be achieved unless the ATM system supports and incentivises air navigation service providers (ANSPs), airport operators and aircraft users to optimize the efficiency of their operations and thus reduce excess fuel burn and emissions to a minimum.

Enhanced airspace organisation that minimises the inefficient use of available airspace, primarily through improved airspace and air traffic control sector design and effective airspace management procedures (civil-military coordination), are additional ATM tools to enable and allow for fuel efficient flight trajectories. Continuous improvement should be fostered at both local and network level.

While a significant progress has already been made in the ATM domain, it is important to now implement the SES2+ reform and focus on continuous improvements in infrastructure and operational procedures, notably through closer cooperation between all stakeholders and faster deployment of SESAR solutions.

#### 6.3.2 SES environmental performance and targets

Overall context: The SES Performance and Charging Scheme 121 defines key performance indicators (KPIs) for air navigation services and network functions, which are used for performance target setting

at Union-wide and local levels in the key performance areas (KPAs) of environment, safety, cost efficiency and capacity. SES Performance Scheme Reference Periods (RP) are divided into five-year periods. This report captures the results of RP2 and RP3, while highlighting intentions for RP4 and preparations for

Reference Period 2 (RP2)	2015-2019
Reference Period 3 (RP3)	2020-2024
Reference Period 4 (RP4)	2025-2029
Reference Period 5 (RP5)	2030 -2034

future RP5 changes (e.g. safety monitoring but no KPA, climate and environmental KPA). The environmental performance dimension of SES involves both target setting to drive improvements as well as and the monitoring and reporting on environmental performance indicators.

Key Performance Indicator for environment (with targets): During RP3, environmental performance has been measured through one KPI, namely horizontal en-route flight efficiency of the actual flight path (KEA). KEA measures the additional distance flown in comparison to the great circle distance (shortest distance between two airports).

The higher the KEA inefficiency value, the worse the performance. However, other factors such as wind, weather, airspace structures, and network constraints influence the optimum trajectory. One of the objectives of the SES2+ proposal from the Commission was to develop a more suitable KPI on environmental performance for RP4. However, due to the duration of the negotiations and adoption of the SES2+ legislation, this was not possible and is now planned for RP5.

Following the COVID pandemic, environmental performance measured against the KEA KPI deteriorated significantly in 2022 and 2023 (Figure 6.3.1). EU Member States were not able to meet, by a wide margin, the Union-wide environmental performance targets set for 2022 (2.37%) and for 2023 (2.40%). Unfortunately, the impact of the war in Ukraine and the subsequent restrictions in parts of EU

<sup>&</sup>lt;sup>121</sup> EU (2019), Regulation (EU) 2019/317 of 11 February 2019 laying down a performance and charging scheme in the single European sky.

airspace made it more difficult to assess whether ATM actions towards improving the KEA actually resulted in tangible benefits. The PRB estimates that over 26 million kilometres of additional distance was flown in 2022 as a result of missing the Union-wide target by 0.59%. This equates to approximately 118 million kilograms of excess fuel burnt (375 million kilograms of CO<sub>2</sub>).

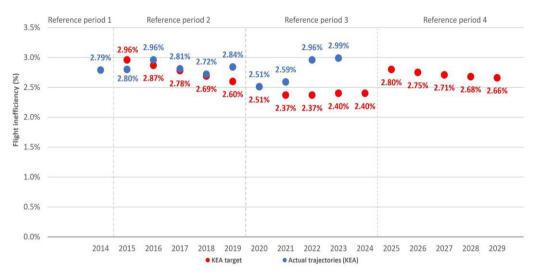


Figure 6.3.1 KEA horizontal en-route flight inefficiency and targets for 2014 to 2029

Performance Indicators for monitoring (without targets): The Performance Scheme includes various indicators that are only monitored at either EU-level or local level but with no binding targets. These include the average horizontal en-route flight efficiency of the last filed flight plan trajectory (KEP)<sup>122</sup> and the shortest constrained trajectory (KES/SCR)<sup>123</sup>. As with all other indicators, KEP and KES/SCR (Figure 6.3.2) have been significantly affected by the war in Ukraine leading to general increases of inefficiency during 2022 and 2023, although there has been a reduction in the delta between KES/SCR and KEP. As with KEA, it is recognized that more suitable indicators are needed to give a clearer indication on the effectiveness of ANSP and Network Manager actions.

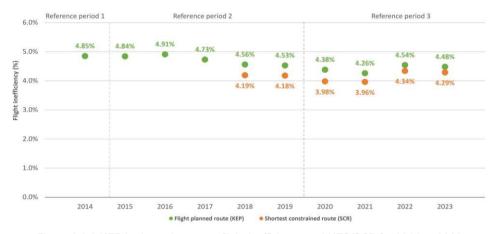


Figure 6.3.2 KEP horizontal en-route flight inefficiency and KES/SCR for 2014 to 2023

The share of flights completing Continuous Descent Operations (CDOs) in 2023 fell by only 0.03% compared to 2022 data. The trend in terms of monthly share of CDO flights during 2023 (Figure 6.3.3) was fairly steady at around 30-35%, even during the summer period with a significantly higher number of flights. Air Traffic Controllers (ATCOs) will endeavour to clear aircraft for a CDO when they can

123 The difference between the length of the en-route part of the shortest constrained route available for flight planning, as calculated by the path finding algorithms and flight plan validation systems of the Network Manager, measured between the exit and entry points of two terminal manoeuvring areas, and the corresponding portion of the great circle distance summed over all IFR flights within or traversing the European airspace.

<sup>122</sup> The difference between the length of the en-route part of the last filed flight plan trajectory and the corresponding portion of the great circle distance, summed over all IFR flights within or traversing the European airspace.

guarantee safe separation all the way to final approach. However, during busy periods, ATCOs may need to use alternative ATC procedures to maintain the required separation, such as radar vectoring and speed control, which are not compatible with CDOs. As such, Figure 6.3.3 illustrates that there is a limited capacity to accommodate CDOs during busier periods.

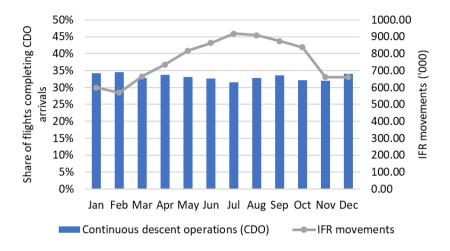


Figure 6.3.3 CDO vertical flight efficiency indicator for 2023

Restrictions on the number of CDOs are linked to the current ATM system. It is expected that with future Time-Based Operations (TBO), more CDOs would be facilitated by embedding them in aircraft fuel efficient trajectories.

Additional time in the Arrival Sequencing and Metering Area (ASMA time): Additional ASMA time, otherwise known as airborne holdings, has a direct impact in terms of increased fuel burn. There is a clear interest in finding a balance between regulating arrivals by absorbing delays on the ground and airborne delays during the approach phase. Airborne delays allow for tactical management of the arrival flow, potentially optimizing the approach sequence and maximizing runway throughput. However, excessive airborne delays are unnecessary and have a clear impact on emissions. As per ASMA, extended taxi-out durations contribute to higher fuel consumption and CO<sub>2</sub> emissions. Recognizing that establishing a departure sequence enhances runway efficiency and that airports may occasionally need to clear stands for arriving flights, striking a balance between ATC pre-departure delays to regulate runway traffic and added taxi-out times is essential for minimizing environmental impacts.

The evolution of both indicators follows a similar trend (Figure 6.3.4) with a slight increase during 2014-2019 followed by a significant decrease due to the drastic reduction in traffic during COVID. Traffic has since recovered such that it is only 10% below 2019 at the 40 busiest EU27+EFTA airports in 2023, while additional ASMA and taxi-out times are also increasing at the same time.

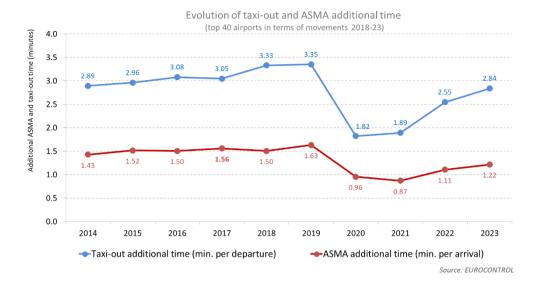


Figure 6.3.4 Average additional ASMA and taxi-out times for the busiest EU27+EFTA 40 airports in terms of flight movements

Significant variations exist between the top 40 busiest EU27+EFTA airports in terms of additional ASMA time (Figure 6.3.5).

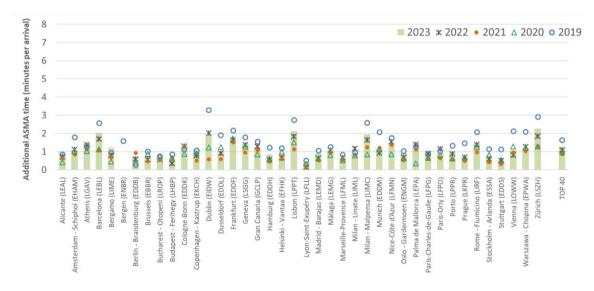


Figure 6.3.5 ATM related inefficiencies on the arrival flow (AMSA) at the 40 busiest EU27+EFTA airports (2019-2023)

Forthcoming Reference Period 4 (2025-2029): It remains essential for the ATM industry to maintain and even strengthen its commitment to contribute to the achievement of the European Green Deal goals and a more sustainable future of the aviation. The RP4 Union-wide performance targets<sup>124</sup> reflect the ambition of enhancing environmental performance and sustainability while building up resilience and strengthening capacity as well as reducing costs. It is also should be noted that PRB has developed a Traffic Light System to assess Member States environmental performance<sup>125</sup>.

The PRB advice to the European Commission regarding the performance indicators for RP4 placed a focus on improving the ATM environmental performance by prioritising actions which enable airspace

<sup>&</sup>lt;sup>124</sup> EC (2024), Commission Implementing Decision (EU) 2024/1688 of 12 June 2024 setting Union-wide performance targets for the air traffic management network for the fourth reference period from 1 January 2025 to 31 December 2029.

<sup>125</sup> PRB (2024), <u>Traffic light system for environmental performance 2023.</u>

users to fly the most fuel-efficient trajectories, and thus reduce the fuel burn gate-to-gate<sup>126</sup>. In the interest of better flight efficiency in European airspace, all efforts need to be made by ANSPs and the Network Manager to support fuel-efficient trajectories, avoiding detours and delays due capacity hotspots.

Given the interdependency between the environment and capacity KPAs, it is crucial to address the long-term capacity shortages faced by certain ANSPs in order to enable the required environmental performance improvements. Such capacity issues have been observed since the second SES Reference Period (2015-2019), and they have re-emerged during the recovery from the COVID-19 crisis due to insufficient ATCOs in the core area of Europe to adequately meet traffic demand.

Recognising the forecasted traffic growth during RP4, which may impact the complexity of operations, and the continued consequences of the war in Ukraine, the future RP4 environmental targets improve following a step-wise approach with KEA targets reducing from 2.80% for 2025 to 2.66% for 2029. Progress has also been made in the development of new and revised performance monitoring indicators (PIs), including within the environmental area, that draw on the results of a study conducted by the Commission. These are currently being discussed by the Single Sky Committee with a view to their possible use during RP4.

Preparations for Reference Period 5 (2030-2034): The new rules to be developed for the performance and charging scheme on the basis of the SES2+ Regulation will start to apply during RP5. This includes a single key performance area that would cover both environmental and climate aspects, as well as a requirement for binding targets for terminal air navigation services provided that adequate environmental indicators are identified and put in place.

The SES performance and charging scheme aims to capture the relationship between flight routing and environmental impacts, and existing indicators were previously regarded as reasonable proxy measures to incentivise ANSP efficiency. However, limitations with the current environmental KPI/PIs have been identified and were confirmed during the COVID pandemic, when some Member States were unable to meet their environmental targets despite a dramatic reduction in traffic. These weaknesses should be borne in mind when drawing conclusions on the basis of the existing KEA KPI, especially when considering the performance achieved at the level of an individual EU Member State's airspace.

It is recognized that the SES performance scheme needs to be improved in terms of the ATM-related performance indicators for environment. KEA does not provide the needed granularity at national level to specifically assess the contribution of ATM to environmental efficiency. However, while this main KPI is not considered fit for purpose, gaining agreement on alternative has proved complicated. Work is now ongoing to find a more robust KPI which, after a period of monitoring and analysis during RP4, will be ready for performance target setting in RP5 and beyond.

#### 6.3.3 Operational performance indicators

Total gate to gate CO<sub>2</sub> emissions: The total gate to gate CO<sub>2</sub> emissions within the EUROCONTROL area<sup>127</sup>, or the part of the trajectory within the airspace for flights to and from the area, were 180.2 million tonnes in 2023, which represents an increase of 14% over 2022. Figure 6.3.6 illustrates the breakdown of these CO<sub>2</sub> emissions by flight phase and, as expected, the cruise and climb phases have the highest share of emissions with 63% and 23% respectively. While much less inefficiencies are detected in the climb phase than in the descent phase, and consequently more attention was given to the descent phase, it is important to note that even a small percentage of inefficiency during the climb can result in a significant amount of additional CO<sub>2</sub>.

 $<sup>^{126} \ \</sup>mathsf{PRB}(2024), \mathsf{PRB}\ \mathsf{report} - \underline{\mathsf{https://eu-single-sky.transport.ec.europa.eu/news/prb-advice-union-wide-targets-rp4-feedback-period-draft-commission-implementing-decision-opened-2024-03-25 \underline{en}$ 

<sup>127</sup> EUROCONTROL (2025), EUROCONTROL Area.

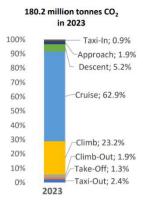


Figure 6.3.6 Total CO<sub>2</sub> emissions by flight phase within the EUROCONTROL area during 2023

Network Fuel Burn: The SES Network Manager (NM) has developed an Excess Fuel Burn (XFB) metric as a measure of the fuel inefficiency on a particular route for a particular aircraft type, compared to a reference based on the best performer on that city pair / aircraft type combination.

Subsequently, the NM has enhanced its fuel burn dataset with fuel profiles for all flights, including fuel burn at specific points along the flight profile, and presents it in different ways on the NM's CO<sub>2</sub>MPASS dashboard<sup>128</sup>. Figure 6.3.7 highlights that 95% of NM departures fly less than 5,000km and represent 55% of total fuel burn, meaning that just 5% of departures representing long-haul flights greater than 5,000km burn 45% of total fuel.

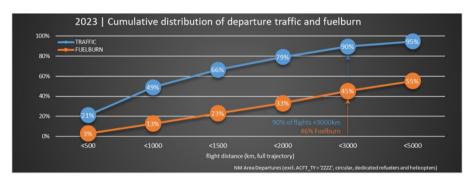


Figure 6.3.7 Cumulative distribution of departure and fuel burn in 2023

Free Route Airspace: Free Route Airspace (FRA) is a SESAR solution that is defined as a volume of airspace within which users may freely plan a route between any defined entry and exit points, subject to airspace availability<sup>129</sup>. The continuous implementation of FRA in Europe over the past years has been an enabler for improved flight efficiency, as it provides airlines with greater flexibility to file more efficient flight plans. However, FRA must not only be implemented but also applied by airlines to reap the benefits.

In line with the European ATM Master Plan and EC Regulation No. 2021/116, FRA implementation with cross-border dimension and connectivity to Terminal Manoeuvring Areas (TMA) should be completed by 31 December 2025. Cross-border FRA areas have been implemented between the following States:

- BALTIC FRA: Poland and Lithuania.
- BOREALIS FRA: Denmark, Estonia, Ireland, Iceland, Finland, Latvia, Norway, Sweden and United Kingdom.

<sup>128</sup> EUROCONTROL (2024), CO<sub>2</sub>MPASS Interactive Dashboard.

<sup>&</sup>lt;sup>129</sup> EUROCONTROL (2022), Free route airspace.

- SECSI FRA: Albania, Austria, Bosnia and Herzegovina, Croatia, Montenegro, North Macedonia, Serbia and Slovenia.
- SEE FRA: Bulgaria, Czech Republic, Hungary, Republic of Moldova, Romania and Slovakia.
- BALTIC FRA and SEE FRA.
- SECSLERA and FRA IT

The Borealis Alliance (a collaboration of ANSPs from Denmark, Estonia, Finland, Iceland, Ireland, Latvia, Norway, Sweden and the United Kingdom) is a pioneer in the implementation of a cross-border FRA among its nine national airspaces. Whilst imple-





price fluctuation





237K min >> 770K min

15K t >> 30K t

44K t >> 94K t CO2

mentation has been slowed down by the COVID crisis, full implementation is still planned by the end of 2026. The above figure illustrates the actual benefits of FRA achieved in 2018 and the estimated annual gains in 2026 with full FRA implementation.

#### Impact of strikes on European Aviation

Between 1 March and 9 April 2023, there were 34 days with industrial action impacting air transport in Europe, mostly in France but also, to a lesser extent, in Germany. As context, for the whole of 2022, there were 5 days of industrial action in France. The 34 days of strikes in 2023 potentially impacted 237.000 flights (flights to, from or across the countries mentioned above, mainly France). By

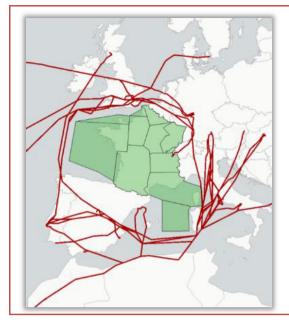
comparison, the airspace closures in Europe resulting from the eruption of the Eyjafjallajökull volcano in 2010 (15-22 April) led to the disruption of some 100,000 flights.

In addition to the impact on passengers, strikes can also have a large environmental footprint. EUROCON-TROL estimates that an extra 96,000 km were flown each strike day in 2023, with an average additional

Each Strike Day (during 7 March - 9 April) 96,000 additional km flown 386 tons of additional fuel burnt 1,200 additional tons of CO<sub>2</sub> emissions

386 tons of fuel burnt and 1,200 tons of CO<sub>2</sub> emissions<sup>130</sup>. The average cost to aircraft operators of cancellations and delays was €14 million per day.

<sup>&</sup>lt;sup>130</sup> EUROCONTROL (2023), <u>Impact of strikes on European Aviation</u>.



As an example, on 12 March, around 40 flights had to extend their path by at least 370 km in order to avoid French airspace (when compared to their flight plans on 5 March, a non-strike day). These strikes also impacted up to 30% of flights across the continent, highlighting the disproportionate impact that disruptions in one country can have on neighbouring countries and the European Network as a whole. Although France does have minimum service provisions, preventing the complete closure of its ATC operations. these do not protect overflights. Minimum service regulations across Europe that protect overflights (such as are seen in, for example, Italy and Spain) would go some way to protect the flying public from the type of disruption as well as the associated environmental impact.

#### 6.3.4 SESAR: Towards the digital European sky

SESAR Research and Development: The first SESAR Joint Undertaking was established in 2007 as



the EU body responsible for the research and development phase of the SESAR innovation cycle. It has produced over 100 solutions with an estimated combined benefit that could enable a 4% reduction in  $CO_2$  emissions per flight. The online SESAR solutions catalogue contains technical information on these solutions and their level of deployment as reported

by European states 131.

The current SESAR 3 Joint Undertaking <sup>132</sup> has a 10-year mandate (2021-2031) to continue this work. During 2024, the European ATM Master Plan was updated to define the critical path for establishing Europe as the most efficient and environmentally friendly sky to fly in the world. It defines the Strategic Deployment Objectives and Development Priorities, providing a framework to facilitate the roll out of SESAR solutions and shaping the European position to drive the global agenda for ATM modernisation at ICAO level.

The implementation of a first critical sub-set of SESAR solutions is mandated by the Common Project 1 (CP1), ensuring a coordinated and timely deployment of key enablers for Trajectory-Based Operations (TBO) and for establishing a digital backbone for the Single European Sky (SES).

<u>Improvements in all phases of flight</u> SESAR addresses the full scope of aviation's environmental impacts, from CO<sub>2</sub> and non-CO<sub>2</sub> emissions to noise and air quality at every phase of flight.

• TAXI phase. During the ground part of the trajectory, a key objective is to reduce the engine-on time. Increasing the predictability of the take-off clearance time avoids waiting time at the runway holding point. In addition, single-engine taxi and engine-off taxi, where aircraft are towed by a sustainable taxi vehicle, can reduce overall engine emissions. The expected reduction of emissions from an engine-off taxi initiative can be over 50% that also was showed cased in ALBATROSS project<sup>133</sup>.

<sup>&</sup>lt;sup>131</sup> SESAR (2021), <u>SESAR Solutions Catalogue</u>.

<sup>132</sup> EU (2021), SESAR Single Basic Act.

<sup>133</sup> SESAR (2020), Albatross Project.

• CLIMB and DESCENT phases. The focus in this phase is to leverage the availability of the optimum profile for each individual flight through the Extended Projected Profile (EPP), where aircraft tend to start their descent on average 35-70 nautical miles (nmi) before what would be their optimum Top-of-Descent (ToD) point<sup>134</sup>. This leads to long thrust descent, which is inefficient even if it does not include intermediate level-offs (Figure 6.3.8). The EPP provides visibility of the optimum top-of-climb and top-of-descent points on the ground, making it possible for air traffic controllers to facilitate a better trajectory. In addition, SESAR advocates a transition from conventional fixed arrival routes commonly used today, towards a more dynamic deployment of RNP (Required Navigation Performance) route structures within the Terminal Manoeuvring Area. Utilizing these dynamic routes increases capacity during peak periods, optimizes fuel consumption during off-peak hours, and decreases the noise footprint particularly during nighttime operations. Moreover, the adoption of these dynamic routes enables agile responses to fluctuations in operational conditions.

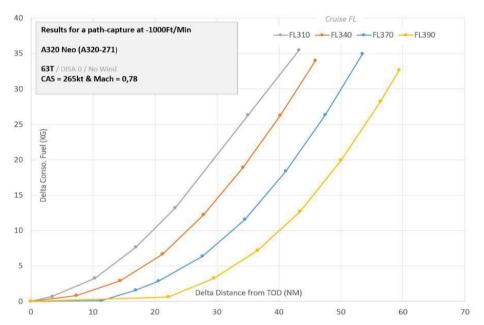


Figure 6.3.8 Increased fuel consumption as a function of the distance before the optimum Top of Descent that the descent phase is started, without intermediate level-offs (e.g. when a descent from cruise at FL370 is started 50nmi early, the additional fuel burn is 30 kg).

• **CRUISE phase**. Free route in the horizontal domain is already widely available in Europe. As such, the enhancement of vertical flight efficiency is a priority through the provision of sufficient airspace capacity for aircraft to fly at their optimum altitude. While the exact increase in emissions varies based on aircraft type and specific flight conditions, studies suggest that flying at lower altitudes can increase fuel consumption by approximately 6-12% compared to optimal cruising altitudes 135 136. An increase in capacity can be achieved via digital and automation support for all ATM processes, including air traffic controllers, such as Dynamic Route Availability Document (RAD) that results in fewer vertical restrictions both at flight-planning and during the flight 137. ATM may also evolve to support the deviation of flights to avoid cruising within airspace where non-CO<sub>2</sub> impacts are disproportionately high (referred to as eco-sensitive volumes).

The SESAR 3 Joint Undertaking has also provided support to operational stakeholders in the monitoring and management of their environmental performance in the planning, execution, and post-operation phases. At the airport level, this includes the full integration of environmental performance monitoring with the Airport Operations Plan (AOP)<sup>138</sup>.

<sup>134</sup> SESAR Optimised Profile Descents Demonstration Report.

<sup>&</sup>lt;sup>135</sup> SESAR (2021), <u>SESAR Solutions Catalogue</u> charting progress towards the Digital European Sky.

<sup>136</sup> SESAR (2020), Albatross Project.

<sup>137</sup> SESAR (2024), Dynamic Route Availability Document (RAD).

<sup>138</sup> SESAR (2024), Airport Operations Plan (AOP).

#### Trajectory optimisation in a digital environment

The deviation from the flight plan during the execution of the flight, for example by allowing an unplanned shortening of the flight path, allows fuel savings and reduced emissions for the flight concerned and its specific flight phase. However, this can have a negative impact on the predictability of the air traffic network, which in turn could have a negative impact on the environment. Trajectory-Based Operational (TBO) concepts ensure the free flow of information between air traffic management units and the Network Manager, allowing rapid sharing of trajectory information across the network and increased flexibility in the execution of the flight for airspace users.

The updated ATM Master Plan has defined the European TBO roadmap for the 2025–2045 period with the ambition of guaranteeing continuous and precise optimisation of all aircraft trajectories throughout their life cycle, from planning to execution, from gate to gate, even in congested airspace. With the potential introduction of zero emissions aircraft beyond 2035, their specific performance characteristics will also need to be considered in terms of any impact on the Network.

SESAR Deployment: The SESAR Deployment Manager<sup>139</sup> plans, synchronises, coordinates and monitors the implementation of the 'Common Projects' that mandate the synchronised deployment of selected ATM functionalities (AF) based on SESAR solutions. The current Common Project (CP1) [EU



2021/116] has 6 AF (Figure 6.3.9) aiming to reduce inefficiencies and thus generate fuel and CO<sub>2</sub> savings in different phases of the flight, especially cruise. The SESAR Deployment Programme<sup>140</sup> defines how the operational stakeholders will implement CP1 AF, which is due to be completed by 31 December 2027. The expected perfor-

mance benefits from CP1 AF represent approximately 20% of the European ATM Master Plan performance ambitions for  $2035^{141}$  and will be a critical step towards sustainable ATM-related aviation in Europe. 65% of CP1 CO₂ savings are expected to be found in the cruise phase, 25% in the descent phase and 10% in the taxi-out phase. By the end of 2023, [CP1] already delivered € 4.6bn worth of cumulative benefits. This value is set to reach € 19.4bn by 2030, once [the CP1] is fully deployed, whilst in a longer timespan [CP1] is expected to bring € 34.2bn worth of cumulative benefits by 2035 and € 52.3bn by 2040.



Figure 6.3.9 Overview of Common Projects 1 (CP1) ATM Functionalities

<sup>139</sup> EU (2021), SESAR Single Basic Act.

<sup>&</sup>lt;sup>140</sup> SESAR (2022), <u>SESAR Deployment Programme 2022</u>.

<sup>141</sup> SESAR (2025), SESAR Deployment Manager.

Figure 6.3.10 below details the total  $CO_2$  savings potential of concerned flights, that could be expected should all CP1 sub-AF concepts be deployed in the future ATM system with all technologies mature and realising their full benefits. The values in the table below represent an order of magnitude of  $CO_2$  savings that can be expected from different sub-functionalities, and which highly depend on the specific conditions of the flight and the local situation.

	CP1 Functionality	Fuel saving per flight concerned	CO2 savings per flight concerned	Time saving per flight concerned	% of ECAC flights concerned	Flight phase concerned
AF1	Departure Management Synchronised with Pre-departure sequencing	[2.9 – 10 kg]	[9.2 - 31.5 kg]	[0.5 – 1 min]	30%	Taxiing phase
	Initial/ extended AOP	[0.4 - 0.8 kg]	[1.2 - 2.5 kg]	[0.1 - 0.1 min]	70%	Taxiing phase
AF2	Airport Safety Nets	[0.1 - 3.1 kg]	[0.3 - 9.7 kg]	[0.01 - 0.01 min]	30%	Taxiing phase
	ASM and A-FUA	[8 - 41.7 kg]	[25.2 - 131.3 kg]	[0.15 - 0.55 min]	10%	Cruising phase
AF3	Enhanced Free Route Airspace Operations	[35 – 58 kg]	[110.2 - 182.7 kg]	[1 – 2 min]	75%	Cruising phase
AF4	Enhanced Short Term ATFCM Measures	n/a		[0.3 – 0.4 min]	5%	Pre departure phase
	Interactive rolling NOP	n/a		[0.2 – 0.3 min]	50%	Pre departure phase
AF5	Automated Support for Traffic Complexity Assessment and Flight Planning interfaces	n/a		[0.1 – 0.2 min]	70%	Pre departure phase
AF6	Initial AirGround Trajectory Information Sharing	[8 - 12 kg]	[25.2 - 37.8 kg]	[0.05 - 0.1 min]	90%	Cruising phase

Figure 6.3.10 CO<sub>2</sub> savings per Common Project 1 ATM Functionality

The benefit-cost ratio (BCR) of the investment in CP1 AF shows the value of the investment by comparing the costs of a project with the benefit that it generates. In this case, it has been estimated that every euro invested into CP1 deployment brought 1.5 euros in return during 2023 to the stakeholders in terms of monetizable benefits, as well as  $0.6 \, \text{kg}$  of  $CO_2$  savings (Figure 6.3.11). Furthermore, the BCR and  $CO_2$  savings are expected to increase overtime as CP1 AF are fully implemented (Figure 6.3.12).

	Already achieved			
Metric	2023	2030	2035	2040
Benefit-cost ratio <sup>13</sup>	1.5	3.8	5.9	8.0
CO <sub>2</sub> kg saved per € invested <sup>14</sup>	0.6	2.2	4.0	6.0

Figure 6.3.11 Benefit-Cost Ratio and CO<sub>2</sub> savings from CP1 AF implementation

	Already achieved			
Metric	2023	2030	2035	2040
Fuel kg saved	7.0 kg	42.3 kg	47.0 kg	47.8 kg
CO <sub>2</sub> kg saved	22.1 kg	133.2 kg	147.9 kg	150.5 kg

Figure 6.3.12 Savings in fuel and CO<sub>2</sub> emissions per flight in 2023 and the forecast out to 2040

#### STAKEHOLDER ACTIONS

## Improving flight efficiency in Skyguide's airspace

Skyguide introduced Free Route Airspace (FRA) within the area under its responsibility at the end of 2022 (Switzerland and parts of France, Italy, Germany and Austria). One of the objectives of Skyguide's FRA project was to optimise flight trajectories between Switzerland and Germany, independent of airspace boundaries. A post-implementation analysis confirmed significant improvements in horizontal flight efficiency. Compared with the pre-COVID period, planned flight paths within Swiss airspace have



been improved by 22%. As a result of cross-border FRA, horizontal flight efficiency performance at the Skyguide-DFS interface has also improved significantly, with planned and flown trajectories at the entry points improving by 16% and 19% respectively. In 2023, despite a 5% increase in traffic compared with 2022, planned and flown trajectories improved by 13% and 2% respectively, thanks mainly to Skyguide's cross-border FRA.

#### CiCERO - Citizen and Community Empowerment in Route Optimization

Austro Control, in collaboration with the Federal Government, is enhancing transparency and public involvement regarding air traffic noise in Austrian airspace. In 2024, an innovative public participation process was launched, inviting citizens to engage and actively shape instrument flight rules (IFR) arrival and departure procedure changes in Austria. Through this initiative, citizens can propose enhancements to existing IFR routes and provide valuable feedback on new or modified routes. Submissions



are reviewed by an expert panel, ensuring every input is considered and assessed. In the first two months of operation, more than 500 inputs were recorded and processed. The entire process is transparently documented, with Austro Control keeping the public informed every step of the way. It aims to enhance quality of life by reducing noise and fostering a safer, punctual, and environmentally friendly air traffic system.

#### **CONCERTO – Dynamic Collaboration to Generalize Eco-friendly Trajectories**

The CONCERTO project aims to make ecofriendly trajectories an everyday occurrence in order to reduce the CO<sub>2</sub> and non-CO<sub>2</sub> impact of aviation. The project will look to integrate green air traffic control capacity into the system, and support stakeholders in balancing regularity and environmental performance at local and network



levels. The project will do so by leveraging state-of-the-art climate science and data to allow ATM stakeholders to take their "eco-responsibility" to the next level. At the same time the project aims to demonstrate that mitigation measures can be deployed progressively at network level, in sync with scientific progress.

#### 6.4 Market-based Measures

- Market-based measures incentivise 'in-sector' emissions reductions from technology, operational measures and sustainable aviation fuels, while also addressing residual emissions through 'out-of-sector' measures.
- Emissions trading systems (e.g. ETS) have a greenhouse gas emissions cap covering various economic sectors, while offsetting schemes (e.g. CORSIA) compensate for emissions via reductions in other sectors but without an associated cap.
- During 2013 to 2023, the EU ETS led to a net CO<sub>2</sub> emissions reduction in aviation of 206 Mt through funding of emissions reductions in other sectors, of which 47 Mt in 2021-2023.
- EU ETS allowance prices have increased in the recent years, reaching an average annual price of more than €80 per tonne of CO₂ in 2022 and 2023.
- Revisions were agreed to the EU ETS in 2023, including a gradual phase-out of free allowances to airlines and a reduction to the aviation emissions cap from 2024 onwards.
- Monitoring, reporting and verification of CO₂ emissions under CORSIA began in 2019. As of 2025, 128 out of 193 ICAO States have volunteered to participate in the CORSIA offsetting scheme.
- Offsetting under the CORSIA scheme is expected to start in 2024. A total of 19Mt of CO<sub>2</sub> emissions are forecast to be offset for flights departing from Europe during CORSIA's first phase in 2024-2026.
- The first emissions units have now been authorized for use in CORSIA, complying with the UNFCCC rules on avoidance of double-counting of emissions reductions.
- Technology to capture carbon from the air and store it underground is being developed to support the broader decarbonisation efforts of the aviation sector.
- The EU Taxonomy System sustainable finance initiative has been amended to include aviation activities.
- No agreement has been reached on proposals to revise the Energy Taxation Directive to introduce minimum rates of taxation for intra-EU passenger flights.

Future goals to address the climate impact of the aviation sector are expected to be achieved by insector measures (technology, operations, fuels) that are incentivised by Market-based Measures (MBMs) through pricing of carbon emissions. This chapter provides an overview of the key MBMs that have been put in place for the aviation sector, including the EU's Emissions Trading System (ETS) and ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), as well as other sustainable finance initiatives.

#### 6.4.1 EU Emissions Trading System

The cornerstone of the EU's policy to combat climate change is the EU Emissions Trading System. Various economic sectors (e.g. power, heat, manufacturing industries, maritime, aviation) have been included within this cap-and-trade system to incentivise CO<sub>2</sub> reduction within each sector, or through trading of allowances with other economic sectors included in the EU ETS where emission reduction costs are lower.

Aviation and the EU ETS: The EU decided to include aviation activities within the EU ETS in 2008<sup>142</sup>, and the system has been applied to aviation activities since 2012. As such, they are subject to the EU's greenhouse gas emissions reduction target of at least minus 55% by 2030 compared to 1990.

<sup>&</sup>lt;sup>142</sup> EC (2008), <u>Directive 2008/101/EC</u> of the European Parliament and of the Council of 19 November 2008 amending Directive 2003/87/EC so as to include aviation activities in the scheme for greenhouse gas emission allowance trading within the Community.

The initial scope of the EU ETS covered all flights arriving at, or departing from, airports in the European Economic Area (EEA)<sup>143</sup>. However, flights to and from airports in non-EEA countries or in the outermost regions were subsequently excluded until the end of 2023 through a temporary derogation. This exclusion facilitated the negotiation of a global market-based measure for international aviation emissions at the International Civil Aviation Organisation (ICAO).

In July 2021, the European Commission adopted the 'Fit for 55' Legislative Package to make the EU's climate, energy, transport and taxation policies fit for achieving the 2030 greenhouse gas emissions reduction target. This included proposed amendments to the EU ETS Directive for aviation activities, which entered into force on 5 June 2023<sup>144</sup>. The main changes to the aviation ETS are applicable from 2024 onwards, and include the following:

- Applying EU ETS for flights within and between countries in the European Economic Area, as well
  as departing flights to Switzerland and to the United Kingdom, while applying CORSIA for flights to
  and from third countries.
- Applying EU ETS for flights between countries in the European Economic Area and the outermost regions, as well as between the outermost regions, unless they connect to the respective Member State's mainland. EU ETS also applies to flights from the outermost regions to Switzerland and the United Kingdom.
- Gradual phase-out of the free ETS allocation to airlines as follows: 25% in 2024; 50% in 2025; and 100% from 2026, meaning full auctioning of EU Allowances to the aviation sector from 2026. The free allocation for the years 2024 and 2025 is distributed according to the aircraft operators' share of verified emissions in the year 2023.
- Applying an annual linear reduction factor of 4.3% to the EU Allowances issued for aviation from 2024 onwards.
- Creation of a new incentive scheme for Sustainable Aviation Fuels (SAF). For the period from 2024 to 2030, a maximum of 20 million ETS allowances will be allocated to aircraft operators for the uplifting of SAF to cover part or all of the price difference between SAF and fossil kerosene, depending on the type of SAF used.
- Setting up a monitoring, reporting and verification system for non-CO<sub>2</sub> aviation effects
- Assessment of CORSIA's environmental performance after the 2025 ICAO Assembly. The Commission will report in 2026 on the progress at ICAO negotiations every three years, accompanied by legislative proposals, where appropriate.

More detailed amendments to the ETS Directive are implemented though various delegated and implementing acts, which are referenced in the Directive itself.

Linking the EU ETS to other emissions trading systems is permitted provided that these systems are compatible, mandatory and have an absolute emission cap. An agreement to link the systems of the EU and Switzerland entered into force on 1 January 2020. Accordingly, flights from the EEA area to Switzerland are subject to the EU ETS, and flights from Switzerland to the EEA area fall under the Swiss ETS. Allowances from both systems can be used to compensate for emissions occurring in either system.

The Environmental Management Information Service (EMIS) of EUROCONTROL, which superseded the EU ETS Support Facility in 2023, continues to provide 28 States with access to EU ETS and ICAO CORSIA related data, as well as traffic and emissions data to over 400 aircraft operators.

Historic and forecasted aviation emissions under EU ETS: The initial total amount of aviation allowances within the EU ETS in 2012 was 95% of the average annual emissions between 2004 and 2006

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 $<sup>^{143}\,\</sup>mbox{The}$  European Economic Area includes EU27, Norway, Iceland and Liechtenstein.

<sup>&</sup>lt;sup>144</sup> EU (2023), <u>Directive (EU) 2023/958</u> of the European Parliament and of the Council of 10 May 2023 amending Directive 2003/87/EC as regards aviation's contribution to the Union's economy-wide emission reduction target and the appropriate implementation of a global market-based measure.

of flights within the full ETS applicability scope (all flights departing from or arriving in the European Economic Area), representing 221.4 million tonnes (Mt) of CO<sub>2</sub> per year. The EUAAs issued for aviation activities in the ETS's third phase (2013-2020) was adjusted for the applicability scope. While aircraft operators may use EUAAs as well as EU Allowances (EUAs) from the stationary sectors, stationary installations are not permitted to use EUAAs. In addition, aircraft operators were entitled to use certain international credits (CERs) until 2020 up to a maximum of 1.5% of their verified emissions. In 2023, there were 254 aircraft operators reporting a total of 53 million tonnes (Mt) of CO<sub>2</sub> emissions under the EU ETS.

Aircraft operators are required to report verified emissions data from flights covered by the scheme on an annual basis. As is shown in Figure 6.4.1, total verified  $CO_2$  emissions from aviation covered by the EU ETS increased from 53.5 Mt in 2013 to 68.2 Mt in 2019. This implies an average increase of  $CO_2$  emissions of 4.15% per year. The impact of the COVID-19 pandemic on international aviation saw this figure fall to 25.3 Mt in 2020, representing a decrease of 63% from 2019 levels. From 2013 to 2020, the amount of annual EUAAs issued was around 38.3 Mt of which about 15% have been auctioned by the Member States, while 85% have been allocated for free. The purchase of EUAs by the aviation sector for exceeding the EUAAs issued went up from 20.4 Mt in 2013 to 32.4 Mt in 2019 contributing thereby to a reduction of around 155.6 Mt of  $CO_2$  emissions from other sectors during 2013-2019. As a result of the COVID-19 pandemic, the verified emissions of 25.3Mt in 2020 were below the freely allocated allowances for the first time (Figure 6.4.1).

Since 2021, a gradual recovery of aviation activities has been observed: total verified aviation CO<sub>2</sub> emissions covered by the EU ETS in 2021, 2022 and 2023 were 27.7Mt, 48.8Mt and 53.0Mt respectively. The free allowances allocated to the aviation sector were 23.9Mt in 2021, 23.1Mt in 2022 and 22.5Mt in 2023. Following the rebound of aviation sector's CO<sub>2</sub> emissions from the COVID-19 pandemic, the sector became a net purchaser of EUAs again in 2022 (22.0Mt) and in 2023 (24.8Mt). From 2021 until 2023, a linear reduction factor of 2.2% has been applied to the Allowances issued for aviation, and this factor will increase to 4.3% for the period of 2024-2027.

As also shown in Figure 6.4.1, the modelled  $CO_2$  emissions under the aviation ETS are expected to grow to 59.5Mt in 2026. In line with the gradual phase out of the free allowances to the aviation sector, the annual amount of freely allocated EUAs for aviation is expected to reduce from 16.1 Mt in 2024 to 10.7Mt in 2025 and then become zero from 2026 onwards. Purchase of EUAs is expected to grow from 27.1Mt in 2024 to 28.7Mt in 2026. Emissions benefits from the claiming of Sustainable Aviation Fuels (SAF) could grow from 0.5Mt in 2024 to 1.7Mt in 2026, as suming a zero emissions factor of SAF as per the EU ETS Directive. Moreover, there could be a relative demand reduction within the aviation sector over the years 2024-2026 of 9.8Mt as a result of the carbon price incurred due to the EU ETS  $^{145}$ .

 $<sup>^{145}</sup>$  Estimation from EASA AERO-MS model. See the Appendix for more details.

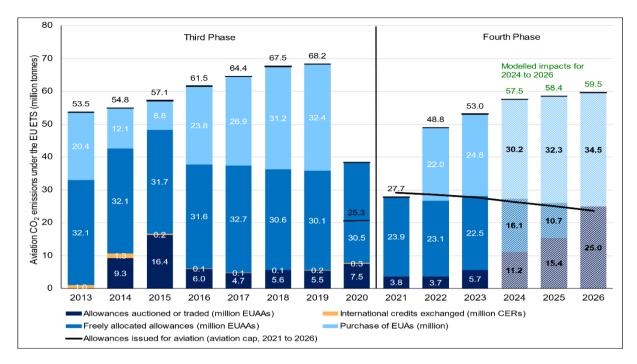


Figure 6.4.1 Aviation CO<sub>2</sub> emissions under the EU ETS in 2013-2023 and modelled impact of the revised ETS Directive for years 2024-2026, where 1 EUAA / EUA equals 1 tonne of CO<sub>2</sub> emissions <sup>146</sup>

Note: Data in Figure 4.1 reflects the years in which the EUAAs were effectively released to the market. This applies especially for allowances attributable to years 2013, 2014 and 2015, which were all auctioned in 2015. The 2014 auctions of EUAAs relate to auctioning of EUAAs due to the postponement of 2012 auctions. Modelled data for years 2024-2026 from the updated AERO-MS model.

As shown in Figure 6.4.2, the annual average EU ETS carbon price varied between €4 and €30 per tonne of  $CO_2$  during the 2013-2020 period. Consequently, total aircraft operator costs linked to purchasing EU Allowances (EUAs) have gone up from around €84 million in 2013 to around €955 million in 2019. Since 2021, the EUA price has increased significantly, reaching average annual EUA prices of more than €80 in 2022 and 2023, resulting in total aircraft operator cost of approximately €1.8 billion in 2022 and €2.1 billion in 2023. Peak EUA prices exceeding €90 per tonne of  $CO_2$  were observed in early 2022 and again in 2023. For the period of 2024-2026, it is estimated that the ETS cost could represent 4-6% of airlines' total annual operating costs <sup>147</sup>.

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<sup>&</sup>lt;sup>146</sup> In addition, the Swiss ETS is forecast to result in a purchase of ETS allowances by aviation sector as follows: 0.3 million in 2023; 0.4 million in 2024; 0.5 million in 2025 and 0.6 million in 2026.

<sup>147</sup> Estimation from EASA AERO-MS model.

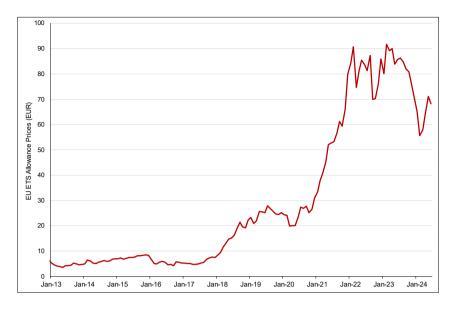


Figure 6.4.2 EU ETS Allowance Prices (2013-2024)

From 2024 until 2030, airlines can apply for additional ETS allowances to cover part or all of the price differential between the use of fossil kerosene and SAF on their flights covered by the EU ETS. A maximum amount of 20 million allowances will be reserved for such a support mechanism, and airlines can apply for an allocation on an annual basis. The Commission will calculate the price differentials annually, taking into account information provided within the annual ReFuelEU Aviation report from EASA.

#### **European Model for Impact Assessments of Market-based Measures**

The EASA AERO Modelling System (AERO-MS) has been developed to assess the economic and environmental impacts of a wide range of policy options to reduce international and domestic aviation



GHG emissions. These policies include taxes (e.g. fuel and ticket taxation), market-based measures (e.g. EU ETS, CORSIA), as well as the introduction of sustainable aviation fuels and air traffic management improvements. The model can provide insight into the effect of policy options on both the supply side and demand side of air travel due to higher prices, and the forecasted impact on emission reductions.

During the last 20 years, the AERO-MS has been a key part of more than 40 international studies where the model results have informed policy discussions and decisions. Beneficiaries of the AERO-MS include a wide range of organizations, including the European Commission, Member States, EASA, IATA, ICAO, aviation industry and NGOs. As a part of a project funded by the EU Horizon 2020 research programme, an update to AERO-MS was completed in 2024 to enhance its capabilities for future studies. This included a new base year of 2019 traffic and emissions, latest information on price elasticities, the addition of particulate matter emissions modelling and the inclusion of the impacts of SAF. Modelling results from AERO-MS have been used as input for various Figures included within this Chapter.

#### 6.4.2 Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

Background: In 2016, the 39th ICAO General Assembly reconfirmed the 2013 aspirational objective of

stabilising CO<sub>2</sub> emissions from international aviation at 2020 levels. In light of this, ICAO States adopted Resolution A39-3 which introduced a global market-based measure called the



'Carbon Offsetting and Reduction Scheme for International Aviation' (CORSIA). ICAO Assembly Resolutions are reassessed every three years, and the current Resolution A41-22 for CORSIA implementation was adopted by the 41<sup>st</sup> ICAO Assembly in 2022, following the outcome of the first CORSIA periodic review by the ICAO Council 148.

CORSIA is being implemented through the associated ICAO Standards and Recommended Practices (SARPs) contained in ICAO Annex 16, Volume IV, the 1<sup>st</sup> Edition of which became applicable on 1 January 2019. In March 2023, the 2<sup>nd</sup> Edition of Volume IV was approved by the Council and became applicable 1 January 2024. There were two main sources for the 2<sup>nd</sup> Edition updates: technical amendments arising from the 12<sup>th</sup> meeting of ICAO's Committee on Aviation Environmental Protection (CAEP) in February 2022, and consequential amendments to reflect the outcome of the 41 ICAO Assembly in October 2022.

#### 12th ICAO CAEP Meeting

- Clarification on technical matters related to monitoring, reporting and verification provisions.
- Definition of an offsetting threshold of 3,000 tonnes of offsetting requirements per 3-year compliance cycle for aeroplane operators with low levels of international aviation activity.
- Clarification on the calculation of offsetting requirements for new aeroplane operators that do not qualify as new entrants.
- Alignment of verification-related contents with the latest applicable editions of International Organization for Standardization (ISO) documents referenced in Annex 16, Volume IV.

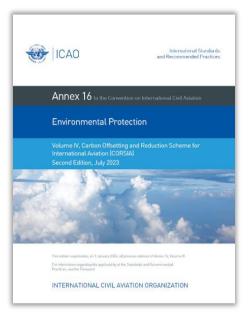
#### 41st ICAO Assembly

- Use 2019 emissions as CORSIA's baseline emissions for the pilot phase years in 2021-2023; and 85% of 2019 emissions after the pilot phase in 2024-2035.
- Decision on the share of individual/sectoral growth factors: 100% sectoral growth factor until 2032;
   85% sectoral / 15% individual growth factor in 2033-2035.
- Use of 2019 emissions for the determination of the new entrant operators threshold.

The SARPs are supported by guidance material included in the Environmental Technical Manual (Doc 9501), Volume IV and so called "Implementation Elements", which are directly referenced in the SARPs 149. ICAO Member States are required to amend their national regulations in line with the amended SARPs, if necessary.

#### **Europe's participation in CORSIA**

In line with the 'Bratislava Declaration' signed on 3 September 2016, and following the adoption of the CORSIA SARPs by the ICAO Council, EU Member States and the other Member States of the European Civil Aviation Conference (ECAC) notified ICAO of their intention to voluntarily participate to CORSIA offsetting from the start of the pilot phase in 2021, provided that certain conditions were met, notably on the environmental integrity of the scheme and global participation. EU member states have implemented CORSIA's MRV provisions since 2019 and, as per the revised EU ETS



<sup>&</sup>lt;sup>148</sup> ICAO (2022), <u>Resolution A41-22</u>: Consolidated statement of continuing ICAO policies and practices related to environmental protection — CORSIA.

<sup>149</sup> ICAO (2024), ICAO CORSIA Implementation Elements: CORSIA Implementation Elements (icao.int)

Directive, are implementing CORSIA's offsetting requirements since 2021 for routes between the European Economic Area (EEA) and States that are participating in CORSIA offsetting, as well as for flights between two such States<sup>150</sup>. Implementation of CORSIA's monitoring, reporting and verification rules within the EU has been through the relevant ETS Regulations <sup>151</sup> <sup>152</sup> <sup>153</sup>.

In Switzerland the CORSIA SARPs are directly applicable, and no additional law is necessary 154.

CORSIA scope and timeline: CORSIA operates on a route-based approach and applies to international flights, i.e. flights between two ICAO States. A route is covered by CORSIA offsetting requirements if both the State of departure and the State of destination are participating in the Scheme and is applicable to all aeroplane operators on the route (i.e. regardless of the administering State).

All aeroplane operators with international flights producing annual  $CO_2$  emissions greater than 10,  $CO_2$  emissions covered by CORSIA's offsetting requirements above 000 tonnes from aeroplanes with a maximum take-off mass greater than 5700 kg, are required to monitor, verify and report their  $CO_2$  emissions on an annual basis from 2019. The  $CO_2$  emissions reported for year 2019 represent the baseline for carbon neutral growth for CORSIA's pilot phase (2021-2023), while for the first and second phases in 2024-2035, the baseline is 85% of the  $CO_2$  emissions reported for year 2019. The aviation sector is required to offset any international these baseline levels.

CORSIA includes three implementation phases. During the pilot and first phases, offsetting requirements will only be applicable to flights between States which have volunteered to participate in CORSIA offsetting. There has been a gradual increase of States volunteering to join CORSIA offsetting, rising from 88 States in 2021 to 129 in 2025<sup>155</sup>. The second phase applies to all ICAO Contracting States, with certain exemptions.



- Participation of States in the pilot phase (2021 to 2023) and first phase (2024 to 2026) is voluntary.
- For the second phase from 2027, all States with an individual share of international aviation activity in year 2018 above 0.5% of total activity or whose cumulative share reaches 90% of total activity, are included. Least Developed Countries, Small Island Developing States and Landlocked Developing Countries are exempt unless they volunteer to participate.

<sup>&</sup>lt;sup>150</sup> As per the ETS Directive, EU ETS is being applied for flights within and between countries in the European Economic Area, as well as departing flights to Switzerland and to the United Kingdom.

<sup>&</sup>lt;sup>151</sup> EU (2024), <u>Implementing Regulation (EU) 2018/2066</u> on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC and amending Commission Regulation (EU) No 601/2012.

 $<sup>^{152}</sup>$  EU (2018), <u>Implementing Regulation (EU) 2018/2067</u> on the verification of data and on the accreditation of verifiers pursuant to Directive 2003/87/EC.

<sup>&</sup>lt;sup>153</sup> EU (2019), <u>Commission Delegated Regulation</u> (EU) 2019/1603 supplementing Directive 2003/87/EC of the European Parliament and of the Council as regards measures adopted by the International Civil Aviation Organisation for the monitoring, reporting and verification of aviation emissions for the purpose of implementing a global market-based measure.

<sup>&</sup>lt;sup>154</sup>FOCA 2025: <u>CORSIA - Carbon Offsetting and Reduction Scheme for International Aviation</u>

<sup>&</sup>lt;sup>155</sup> ICAO (2024), CORSIA States for Chapter 3 State Pairs.

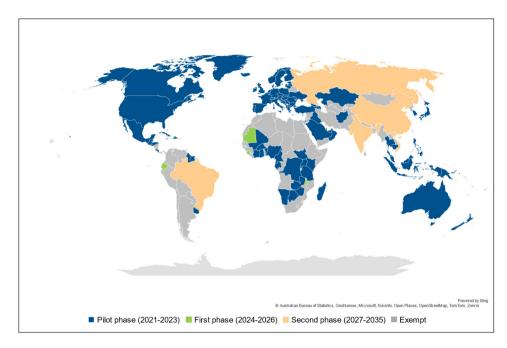


Figure 6.4.3 ICAO Member States participation in CORSIA offsetting in various phases

Due to the change in CORSIA baseline to 2019 emissions for years 2021-2023, and the fact that international aviation emissions covered by routes between two States that have volunteered to join CORSIA offsetting have not reached 2019 levels by 2023, there has not been any offsetting requirements to airlines from CORSIA during its pilot phase. Figure 6.4.4 illustrates the reported  $CO_2$  emissions from all international flights (blue bars) and a subset of these emissions (green bars) between States that have volunteered to join CORSIA offsetting in respective years. For years 2021-2023, CORSIA's baseline emissions are the total  $CO_2$  emissions covered by CORSIA offsetting in 2019. This baseline emissions will be re-calculated for every given year, based on the routes covered by CORSIA offsetting requirements in that given year.

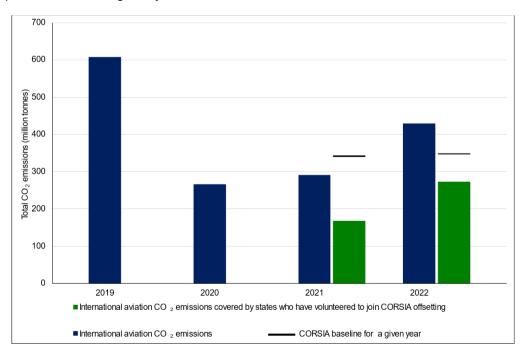


Figure 6.4.4 International aviation CO<sub>2</sub> emissions reported through the CORSIA Central Registry

The revised EU ETS will be applied to flights within and between countries in the European Economic Area, as well as departing flights to Switzerland and to the United Kingdom, while applying CORSIA

offsetting for flights to, from and between third countries that participate in CORSIA offsetting. It is estimated that the offsetting requirements for flights departing from Europe will increase from 5.2 tonnes in 2024 to 7.3 tonnes in 2026 156 (Figure 6.4.5).

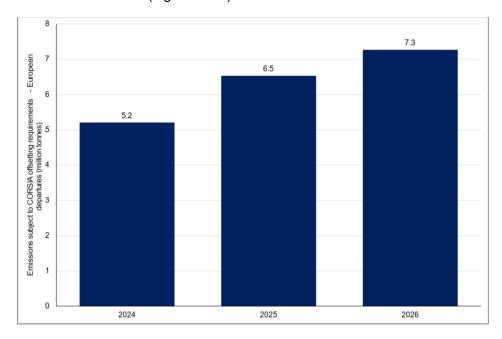


Figure 6.4.5 Estimated CORSIA offsetting requirements for departing flights from Europe <sup>157</sup>

CORSIA in practice: International flights within the scope of CORSIA are attributed to an aeroplane operator, and each operator is attributed to an administrating State to which it must submit an Emissions Monitoring Plan. Since 1 January 2019, an aeroplane operator is required to report its annual CO<sub>2</sub> emissions to the State to which it has been attributed, irrespective of whether it has offsetting obligations. As of 1 January 2021, the State calculates annual offsetting requirements for each operator that has been attributed to it by multiplying the operator's CO<sub>2</sub> emissions covered by CORSIA offsetting obligations with a Growth Factor. For years 2021-2032, the Growth Factor represents the percentage growth of the aviation sector's international CO<sub>2</sub> emissions covered by CORSIA's offsetting requirements in a given year compared to the sector's baseline emissions. For the period of 2033-2035, the Growth Factor is calculated by using 85% of the sector's growth against the baseline and 15% of individual aeroplane operator's growth against the baseline.

At the end of each 3-year compliance period (2021-2023, 2024-2026, etc.), an aeroplane operator must meet its offsetting requirements by purchasing and cancelling certified CORSIA eligible emissions units. Each emissions unit represents a tonne of CO<sub>2</sub> avoided or reduced. In order to safeguard the environmental integrity of offset credits used under CORSIA, the emission units must comply with the Emission Unit Criteria approved by the ICAO Council. The price of a CORSIA eligible emissions unit has varied greatly depending on the type of the project (\$0.50 to \$45/tCO<sub>2</sub>e during 2020-2021 with a weighted average of \$3.08/tCO<sub>2</sub>eq in 2021)<sup>158</sup>. For the period 2024-2026, it is estimated that the cost of purchasing CORSIA offset credits could be limited at 0.07-0.15% of the total annual operating costs for airlines. Aeroplane operators can also reduce their offsetting requirements by using CORSIA eligible fuels (CEF) that meet the CORSIA sustainability criteria, which includes at least 10% less CO<sub>2</sub>e emissions on a life-cycle basis compared to a reference fossil fuel value of 89.1qCO<sub>2</sub>e/MJ.

<sup>&</sup>lt;sup>156</sup> Estimation by EASA AERO-MS model.

<sup>&</sup>lt;sup>157</sup> Covers departing traffic for all airlines from EEA countries and Switzerland to third countries that participate in CORSIA offsetting, except for flights to the United Kingdom, which are covered by EU and CH ETS.

<sup>&</sup>lt;sup>158</sup> Ecosystem Marketplace (2024), CORSIA Carbon Market Data.

ICAO has established a Technical Advisory Body (TAB) to undertake the assessment of Emissions Unit Programmes against the approved Emissions Units Criteria, and to make annual recommendations on their use within CORSIA. To date, based on the TAB's recommendations, the ICAO Council has approved 11-emissions unit programmes to supply CORSIA Eligible Emissions Units for CORSIA's pilot phase in 2021-2023, and two programmes to supply Units for the first phase in 2024-2026<sup>159</sup>.

In addition to avoidance and reduction projects, removal projects that are designed to remove carbon from the atmosphere can include both natural (e.g., planting trees) and technological carbon removal processes (e.g. Direct Air Capture – DAC or Direct Air Carbon Capture and Storage – DACCS) and have a potential to produce high-quality carbon offsets in the future. Carbon capture and storage technologies can also potentially be utilized for the production of sustainable aviation fuels. The EU has put forward a carbon removal certification framework<sup>160</sup>, which aims to scale up carbon removal activities by empowering businesses to show their action in this field. Such certified removals can potentially become eligible in schemes such as CORSIA or when offsetting internal aviation emissions.

In order to address concerns on double counting, rules for international carbon markets under Article 6 of the Paris Agreement were adopted at the UN COP26 meeting in 2021. These rules require a host country to authorize carbon credits for 'international mitigation purposes', such as CORSIA, and to ensure that these emission reductions are not used to achieve its National Determined Contribution (NDC) under the UNFCCC process. These rules are designed to guarantee that corresponding adjustments take place prior to these emission reductions being used to demonstrate compliance with CORSIA. First announcements of authorizations of carbon credits for CORSIA compliance purposes have been observed in early 2024<sup>161</sup>.

#### What are the differences and similarities between the EU ETS and CORSIA?

The EU ETS is a cap-and-trade system, which sets a limit on the number of emissions allowances issued, and thereby constrains the total amount of emissions of the sectors covered by the system. In the EU ETS, these comprise operators of stationary installations (e.g. heat, power, industry), maritime transport operators and aircraft operators. The total sum for aviation allowances in the EU ETS is 95% of the average emissions between 2004 and 2006, adjusted for the applicability scope and reduced by the linear reduction factor annually. The total number of emissions allowances is limited and reduced over time, thereby driving operators in need of additional allowances to buy these on the market from other sectors in the system – hence 'cap-and-trade'. This ensures that the objective of an absolute decrease of the level of CO<sub>2</sub> emissions is met at the system level. The revised EU ETS Directive is expected to lead to emission reductions of 61% in 2030 compared to 2005 levels for the sectors covered by the Directive. The supply and demand for allowances establishes their price under the ETS, and the higher the price, the higher the incentive to reduce emissions in order to avoid having to purchase more allowances. Aircraft operators can also use Sustainable Aviation Fuels to comply with their ETS obligations.

The ICAO CORSIA is an offsetting scheme with an objective of carbon neutral growth designed to ensure that CO<sub>2</sub> emissions from international aviation do not exceed 2019 levels in 2021-2023 and 85% of 2019 levels in 2024-2035. To that end, aeroplane operators will be required to purchase offset credits to compensate for emissions above the CORSIA baseline or use CORSIA Eligible Fuels. The observed spread of the cost of CORSIA eligible emission units has been high and dependent on the project category.

<sup>159</sup> ICAO (2024), CORSIA Eligible Emissions Units.

<sup>&</sup>lt;sup>160</sup> EC (2022), <u>Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a Union certification framework for carbon removals.</u>

<sup>161</sup> Government of Guyana (2024), World's First Carbon Credits for Use in UN Airline Compliance Programme, CORSIA

EU ETS allowances are not accepted under CORSIA, and international offset credits, including those deemed eligible under CORSIA, are not accepted under the EU ETS as of 1 January 2021.

Both the EU ETS and CORSIA include similar Monitoring, Reporting and Verification (MRV) systems, which are aimed to ensure that the  $CO_2$  emissions information collected through the scheme is robust and reliable. The MRV system consists of three main components: first, an airline is required to draft an Emissions Monitoring Plan, which needs to be approved by a relevant Competent Authority. After the Plan has been approved, the airline will monitor its  $CO_2$  emissions either through a fuel burn monitoring method or an estimation tool. The necessary  $CO_2$  information will be compiled on an annual basis and reported from airlines to their Competent Authorities by using harmonised templates. A third-party verification of  $CO_2$  emissions information ensures that the reported data is accurate and free of errors. A verifier must be independent from the airline, follow international standards in their work and be accredited to the task by a National Accreditation Body.

#### 6.4.3 Sustainable Finance and Energy Taxation Initiatives

In addition to the EU ETS and CORSIA, there are recent regulatory developments in the area of sustainable finance and energy taxation that are relevant for the aviation sector, notably the introduction of aviation-related activities under the EU Taxonomy system, as well as proposal to introduce minimum rates of fuel taxation for intra-EU passenger flights.

EU Taxonomy: In order to direct investments towards sustainable products and activities, the EU has introduced a classification system, or "EU Taxonomy". This EU Taxonomy is expected to play a crucial role in scaling up sustainable investment and implementing the EU Green Deal by providing companies, investors and policymakers with definitions of which economic activities can be considered as environmentally sustainable. Under the Taxonomy Regulation <sup>162</sup>, "Technical Screening Criteria (TSC)" have been developed for economic activities in various sectors. These TSC determine the conditions under which an economic activity qualifies as Taxonomy aligned and should be reviewed on a regular basis, and at least every 3 years.

On 9 December 2021, a first delegated act on sustainable activities for climate change mitigation and adaptation objectives of the EU Taxonomy ("Climate Delegated Act") was published in the Official Journal<sup>163</sup>. It included the activity on low carbon airport infrastructure as well as on manufacture of hydrogen and hydrogen-based synthetic fuels.

The Climate Delegated Act<sup>164</sup> was amended in 2023 to include the following additional aviation-related activities: manufacturing of aircraft, leasing of aircraft, passenger and freight air transport and air transport ground handling operations.

The new TSC focus on incentivising the development and market introduction of aircraft with zero direct (tailpipe) CO<sub>2</sub>emissions, and best-in-class aircraft. In addition, and as transitional activities, the TSC also incentivise the manufacturing and uptake of the latest generation aircraft that replace older, less fuel-efficient models without contributing to fleet expansion. The latest generation aircraft are identified by referring to a certain margin to the ICAO New Type Aeroplane CO<sub>2</sub> standard, several other requirements and 'do no significant harm' (DNSH) criteria, including on emissions and noise. In

<sup>&</sup>lt;sup>162</sup> EU (2020), Regulation (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

<sup>&</sup>lt;sup>163</sup> EU (2021), Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.

<sup>&</sup>lt;sup>164</sup> EU (2023), <u>Delegated Regulation (EU) 2023/2485</u> of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

addition, the TSC also puts a strong emphasis on the replacement of fossil jet fuel with Sustainable Aviation Fuels (SAF) and the technical readiness of the aircraft fleet to operate with 100% SAF.

EU Energy Taxation Directive: Aviation fuel, other than in private pleasure-flying, is currently exempted from taxation under the EU Energy Taxation Directive. EU Member States could tax fuel used for domestic flights or for intra-EU transport if agreed between the Member States concerned on a bilateral basis, although none currently do so. As part of the 'Fit for 55' Legislative Package, the European Commission has proposed to introduce minimum rates of taxation for intra-EU passenger flights that would encourage a switch to sustainable fuels as well as more fuel-efficient aircraft<sup>165</sup>. According to the proposal, the tax for aviation fuel would be introduced gradually over a period of 10 years before reaching the final minimum rate of €10.75/GJ (approximately €0.38 per litre). In comparison, sustainable aviation fuels would incur a zero-tax rate during this same period and after that benefit from a lower minimum tax rate. No agreement on a final Directive has been achieved to date.

*Voluntary Offsetting:* In recent years, some airlines have introduced voluntary offsetting initiatives aimed at compensating, partly or in full, those  $CO_2$  emissions caused by their operations that are not mitigated by other measures. Such voluntary initiatives have the potential to contribute to a more sustainable aviation sector, assuming that investments are channelled to high quality offset credits that meet certain quality criteria, e.g. are additional <sup>166.</sup> However, there has been some criticism of the quality of offset credits in this unregulated voluntary market, as well as scepticism of such voluntary activity enhancing aviation sustainability <sup>167</sup> <sup>168</sup> <sup>169</sup>.

#### STAKEHOLDER ACTIONS

#### Airbus Carbon Capture Offer (ACCO)

Airbus developed ACCO with the aim to bring to the aviation industry high-environmental integrity, scalable and affordable carbon dioxide removal credits<sup>170</sup>. ACCO looks to support the management of the remaining and residual CO<sub>2</sub> emissions of aircraft with the latest carbon removal technologies.

As a first step, Airbus partnered with 1PointFive for exploring direct air



carbon capture and storage solutions for the aviation industry. In particular, 1PointFive is developing a large-scale facility expected to capture 0.5 million tonnes of  $CO_2$  per year starting in 2025. Airbus has committed to purchase 400,000 tonnes of  $CO_2$  removals. This initiative aims to support efforts for decarbonising and mitigating Airbus' Scope 3 emissions from the use of its sold product, and also contributes to the larger efforts already underway across the aviation industry.

<sup>&</sup>lt;sup>165</sup> EC (2021), <u>Proposal for a COUNCIL DIRECTIVE restructuring the Union framework for the taxation of energy products and</u> electricity.

<sup>&</sup>lt;sup>166</sup> "Additionality" means that that the carbon offset credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario. ICAO (2019), CORSIA Emissions Unit Eligibility Criteria.

<sup>167</sup> Bloomberg (2024), Inside the Controversy That's Divided the Carbon Offsets Market - BNN Bloomberg.

<sup>168</sup> Washington Post (2023), Airlines want you to buy carbon offsets. Experts say they're a 'scam.' - The Washington Post.

<sup>&</sup>lt;sup>169</sup> De Mello, Fabiana Peixoto (2024), <u>Voluntary carbon offset programs in aviation: A systematic literature review, Transport Policy, Volume 147, Pages 158-168.</u>

<sup>170</sup> Airbus (2024), Airbus Carbon Capture Offer.

#### 6.5 Additional Measures

- Significant airport initiatives are being taken forward to invest in onsite production of renewable energy to electrify ground support equipment, thereby mitigating noise and emissions.
- Airport infrastructure will need to be adapted to accommodate SAF and zero emissions aircraft (electric, hydrogen) to meet ReFuelEU Aviation requirements. Various research projects and funding mechanisms are leading the way.
- Some airports are supporting the uptake of SAF through investment in production, supply chain involvement, raising awareness, financial incentives and policy engagement.
- 132 airports in Europe have announced a net zero CO<sub>2</sub> emissions target by 2030 or earlier, and 13 airports have already achieved it.
- In 2023, a new Level 5 was added to the Airport Carbon Accreditation programme requiring 90% CO<sub>2</sub> emissions reductions in Scopes 1 and 2, a verified carbon footprint and a Stakeholder Partnership Plan underpinning the commitment of net zero CO<sub>2</sub> emissions in Scope 3.
- Global environmental challenges require global cooperation to achieve agreed future goals.
- International Cooperation is a key element to reach the global objective of net-zero CO<sub>2</sub> emissions by 2050 including the aim to achieve a 5% reduction of CO<sub>2</sub> emissions from the use of Sustainable Aviation Fuels (SAF), Low Carbon Aviation Fuels and other aviation cleaner energies by 2030.
- Since 2022, EU entities (e.g. States, Institutions and Stakeholders) have committed more than €20M to support environmental protection initiatives in civil aviation across Africa, Asia, Latin America and the Caribbean.
- Collaboration with Partner States has contributed to the sound implementation of CORSIA-Monitoring Reporting and Verification in more than 100 States and facilitated new States joining its voluntary pilot and first phases.
- Technical support contributed to the development of a first or updated State Action Plan for CO<sub>2</sub> emissions reduction within 18 States, and to an enhanced understanding of SAF and the associated opportunities worldwide.
- Future efforts with Partner States in Africa, Asia, Latin America and the Caribbean are expected to focus on the implementation of CORSIA offsetting and building capacity to increase SAF production.
- SAF, which has the biggest potential to significantly reduce the carbon footprint of air transport in the short- and long-term, are also an opportunity for States to develop their green economy and to boost job creation. Hence, initiatives like the EU Global Gateway are providing financial support (initially on feasibility studies) to help realise viable SAF production projects in Partner States.
- Awareness, coordination, and collaboration in International Cooperation initiatives among supporting partners are essential factors to maximise the value of the resources provided to Partner States.
- The Aviation Environmental Protection Coordination Group (AEPCG) provides a forum to facilitate this coordination of European action with Partner States.

#### 6.5.1 Airport Measures

A) Aircraft Operations

Performance Based Navigation (PBN): The use of Performance Based Navigation (PBN) enables an optimum aircraft flight path trajectory to mitigate environmental impacts, particularly in the vicinity of airports, without having to overfly ground-based navigation aids. Implementation of the PBN Regulation<sup>171</sup> has shown a positive trend since the last report. As of July 2024, 75% of instrument runways are now fully compliant with the requirements and the implementation of PBN has respectively started

<sup>&</sup>lt;sup>171</sup> EU (2018), <u>Regulation 2018/1048</u> laying down airspace usage requirements and operating procedures concerning performance based navigation.

for 81% Standard Instrument Departures (SIDs) and 82% Standard Terminal Approach Routes (STAR) at these runways. Completion is due by 2030.

The implementation of the PBN Regulation is expected to result in a number of environmental benefits, although neither their evaluation nor their quantification is mandated. As such, it has proven challenging to identify relevant data for this report. Stakeholders responsible for putting in place the required PBN routes and procedures are encouraged to optimise airspace design and the potential environmental benefits, in particular for flight efficiency and route placement flexibility.

Green Operational Procedures: Building on the previous ALBATROSS research project 172, the goal of



the SESAR project HERON launched in 2023 is to reduce the environmental impact from aviation through the deployment of already-mature solutions that range from more efficient aircraft operations to optimised management of air traffic during flights<sup>173</sup>. This includes the Green Apron Management demonstration, which uses sensors and artificial intelligence for more predictable and efficient aircraft handling during airport stopovers.

Noise Abatement Departure Procedures (NADPs): NADPs aim to reduce the noise impact of departing aircraft by selecting the appropriate moment to clean the aircraft (i.e. retract flaps), which has an impact on the flown vertical profile. NADP1 results in noise reductions close to the airport, while NADP2 reduces noise further away and has lower fuel consumption (Figure 6.5.1). Depending on the operational context (aircraft type, take-off weight, weather, etc) and on the location of the noise sensitive areas, the best balance between noise and emission reductions needs to be determined.

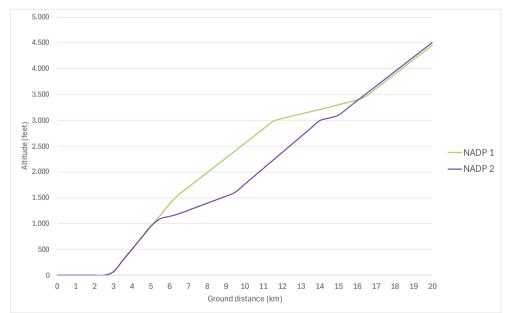


Figure 6.5.1 Example of the difference between NADP 1 and 2 for a wide body aircraft with thrust reduction at 1,000ft.

A study performed by EUROCONTROL highlighted that in many cases a fixed NADP procedure for all aircraft types and runways is advised or mandated by the airport authorities, but that this is not always the optimal solution to balance noise and emission reductions. Noise sensitive areas vary from airport to airport, and from departure runway to runway. As such, airports should identify key noise sensitive areas in each Standard Instrument Departure procedure. By taking the local operational context into

<sup>&</sup>lt;sup>172</sup> SESAR (2021), <u>ALBATROSS</u> research project.

<sup>&</sup>lt;sup>173</sup> SESAR (2023), <u>HERON</u> research project.

consideration and allowing the flight crew to determine the best NADP, additional noise or emission reductions could be achieved.

The study concluded that in some cases where NADP1 procedures are applied, using NADP2 procedures could reduce fuel burn by 50kg to 200kg while only marginally increasing noise by 1dB close to the airport.

Sustainable Taxiing: Trials linked to sustainable taxiing are ongoing at various airports (e.g. Amsterdam Schiphol, Eindhoven, Paris Charles-de-Gaulle and Brussels) through various SESAR research projects as well as national projects. To incentivise implementation and to synchronize developments, a EUROCONTROL / ACI-EUROPE Sustainable Taxiing Taskforce developed a Concept of Operations in 2024<sup>174</sup>.



The Concept of Operations (CONOPS) addresses the potential fuel burn reductions of several sustainable taxiing solutions, which could be up to 400kg CO<sub>2</sub> from a single aisle aircraft taxi-out phase. In addition, there are noise and air quality benefits as the aircraft engine start-up and shutdown procedures occur away from the gate area.

These benefits are mainly the result of operational improvements, such as single engine taxing, combining engine start-up while taxiing, or combining pushback and taxi clearances by air traffic control, thereby reducing total taxi and engine running times that still take into consideration engine thermal stabilization and some additional complexity

in ground operations. Research is also looking into limiting Auxiliary Power Units (APU) use to outside certain temperature above a certain threshold. On-going trials are expected to further clarify how to integrate the different taxi operational solutions and quantify their benefits by end of 2025.

#### B) Airport Infrastructure

Various EU research projects, including TULIPS<sup>175</sup>, OLGA<sup>176</sup> and STARGATE<sup>177</sup>, are currently demonstrating innovative environmental solutions at airports, which can be replicated on a European scale.

Ground Support Equipment: Sustainable ground operations at airports have received growing attention in the last few years as a way to address concerns regarding health and working conditions of airport operational staff, as well as the impact on communities in the vicinity of airports. States are already in the process of adopting more stringent regulations to address these concerns resulting in airports looking to fully electrify their ground operations <sup>178</sup>.

<sup>&</sup>lt;sup>174</sup> EUROCONTROL (2024), Sustainable Taxiing Operations – Concept of Operations and Industry Guidance.

<sup>&</sup>lt;sup>175</sup> EU (2025), <u>TULIPS</u> Horizon 2020 research project.

<sup>176</sup> EU (2025), OLGA Horizon 2020 research project.

<sup>177</sup> EU (2025), STARGATE Horizon 2020 research project.

<sup>178</sup> Schiphol (2024), Emissions Free by 2030.

To advance carbon neutrality of ground operations, Skytanking and Brussels Airport have been developing electric hydrant fuel dispensers, which deliver aviation fuel from the underground hydrant system into the aircraft. After a successful test period in 2023 during which two diesel fuel dispensers were retrofitted to run on electricity, Skytanking commissioned two custom made fully electric hydrant fuel dispenser, which were delivered in 2024 leading to a significant reduction in noise and exhaust gases, which is important for both the local environment and for the ground handling staff.



As part of the same research project, DHL Express has replaced a third of its ground handling fleet (tractors, container lifts, belly loaders and pushbacks) with fully electric equivalents.



In 2024, Frankfurt Airport commissioned an expansion to its vertical photovoltaic solar energy system beside Runway 18 West in order to supply renewable energy to power electrified ground support equipment<sup>179</sup>. This facility has provided such encouraging results that its gradually expanded from 8.4kW to 17.4MW, and is now consid-

ered the world's largest facility of its kind at an airport. The airport is also using charging infrastructure bidirectionally, which means it's possible to turn electric vehicles into mobile power storage units <sup>180</sup>.

Zero Emission Aircraft: The European Commission has established the Alliance for Zero Emission Aircraft (AZEA) to prepare the aviation ecosystem for the entry into service of hydrogen and electric aircraft (see Technology-Design chapter). This will require major investment in energy infrastructure is required to prepare for the introduction of zero-emission aircraft with electric and hydrogen propulsion. The large-scale introduction of zero-emission aircraft will be a crucial pillar in reaching net zero carbon emissions by 2050.



GOLIAT is an EU project that brings together all relevant aviation stakeholders to demonstrate small-scale liquid hydrogen aircraft ground operations at three European airports<sup>181</sup>. Launched in 2024, the group will support the aviation industry's adoption of liquid hydrogen (LH2) transportation and energy storage solutions by:

- Developing and demonstrating LH2 refuelling technologies scaled-up for future
- large aircraft;
- Demonstrating small-scale LH2 aircraft ground operations at airports;
- Developing the standardisation and certification framework for future LH2
- operations; and
- Assessing the sizing and economics of the hydrogen value chains for airports.

New airport pavement bearing strength calculation to optimise maintenance works: In order to ensure safe aircraft operations, airports need to continuously monitor the lifetime and life cycle of critical pavement infrastructure (runways, taxiways and aprons) based on the impact caused by different types of

<sup>&</sup>lt;sup>179</sup> Fraport (2024), Frankfurt Airport Vertical Photovoltaic System.

<sup>&</sup>lt;sup>180</sup> Fraport (2024), Frankfurt Airport Using Charging Infrastructure Bidirectionally.

<sup>&</sup>lt;sup>181</sup> EU (2024), GOLIAT (Ground Operations of Liquid hydrogen Aircraft) research project.

aircrafts with different weights, tyre geometry and tyre pressure. In 2024 EASA published guidance to European airports and competent authorities that changed the Aircraft Classification Rating - Pavement Classification Rating (ACR-PCR) methodology used to calculate pavement bearing strength<sup>182</sup>. These changes are expected to optimise the use of pavement, reduce maintenance needs and costs and also reduce greenhouse gas emissions through a well-managed and better targeted pavement life cycle management by airports.

Sustainable Aviation Fuels: The European policy framework for the deployment of SAF is ReFuelEU Aviation Regulation, which sets out a supply mandate for aviation fuel suppliers and an obligation on Union airports to facilitate this supply of aviation fuels containing the minimum shares of SAF to aircraft operators. European airports are also taking voluntary actions to support the uptake of SAF through various means (Figure 6.5.2). A detailed overview of these types of SAF incentive initiatives by European airports has been compiled by ACI EUROPE 183.

#### Supply Chain Investment

- Support airlines on logistic issue to facilitate the delivery of SAF.
- Engage in joint negotiations with SAF suppliers, carriers and other airports to develop

## SAF projects.

Invest in SAF production facilities.

#### Raise Awareness

• Inform passengers and corporations on opportunities to purchase SAF for their flights and/or support SAF projects to compensate for their CO<sub>2</sub> emissions.

#### Financial Incentives

 Provide airlines with SAF incentive programmes (e.g. cost sharing of SAF price premium, differentiated landing and take-off fees based on SAF use, free SAF storage).

## Policy Engagement

 Engage with government and local stakeholders to support SAF development and financial incentives for airlines, but not through any kind of minimum shares of SAF other than those of ReFuelEU Aviation.

Figure 6.5.2 Overview of airport initiatives to support the uptake of SAF

The EU ALIGHT research project, led by Copenhagen airport, is looking into how to address the barriers to the supply and handling of SAF at major airports by improving the logistics chain in the most efficient and cost-effective manner<sup>184</sup>.

<sup>&</sup>lt;sup>182</sup> EASA (2024), <u>Guidance for the implementation of the new Aircraft Classification Rating (ACR) – Pavement Classification Rating (PCR) method for the EASA Member States</u>.

<sup>183</sup> ACI-E (2024), European airports' initiatives to incentivise SAF.

<sup>&</sup>lt;sup>184</sup> EU (2025), ALIGHT Horizon 2020 research project.

#### Greening Aviation Infrastructure

As the aviation sector evolves to address environmental challenges, this transition is being supported through Member State actions and EU support, notably the Trans-European Transport Network 185, the Alternative Fuels Infrastructure Regulation 186 and their 'financial arm' in the form of the Connecting Europe Facility 187.

Trans-European Transport Network (TEN-T)

The revision of the TEN-T Guidelines <sup>188</sup> introduces requirements on Member States that include the improvement of airport connections to the trans-European railway network, air traffic management infrastructure to enhance the performance and sustainability of the Single European Sky, alternative fuels infrastructure and pre-conditioned air supply to stationary aircraft.

Alternative Fuels Infrastructure Regulation (AFIR)

The AFIR introduces mandatory targets for Member States on the provision of electricity to stationary aircraft at TEN-T network airports and requires Member States to define national strategies on deployment of ground infrastructure for electric and hydrogen aircraft.

Connecting Europe Facility (CEF)

Under CEF Transport Alternative Fuel Infrastructure Facility, 20 projects representing 63 airports from across the EU were selected since 2021, with a total EU Grant support exceeding €160 million<sup>189</sup> <sup>190</sup>. The support has been directed to electricity and pre-conditioned air supply to stationary aircraft, electric charging of ground support equipment, electricity grid connections and green electricity generation.

#### C) Net Zero CO2 Emissions

The ACI EUROPE Sustainability Strategy was launched in 2019<sup>191</sup>, which included the Net Zero Resolution that has been updated in 2024<sup>192</sup>. 303 European airports have since committed to net zero <sup>193</sup> carbon emissions from airport operations within their control by 2050 and provided a roadmap detailing how this will be achieved <sup>194</sup>.

This net zero commitment covers Scope 1 direct airport emissions and Scope 2 indirect emissions (e.g. consump-



tion of purchased electricity, heat or steam). 132 airports have announced a net zero target by 2030 or earlier, and 13 airports have already achieved net zero. In 2022, guidance on reducing Scope 3 emis-

<sup>&</sup>lt;sup>185</sup> EU (2025), <u>Trans European Transport Network (TEN-T)</u>.

<sup>&</sup>lt;sup>186</sup> EU (2023), Alternative Fuels Infrastructure Regulation.

<sup>&</sup>lt;sup>187</sup> EU (2025), <u>Connecting Europe Facility</u>.

<sup>&</sup>lt;sup>188</sup> EU (2024), Regulation (EU) 2024/1679 of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013.

<sup>&</sup>lt;sup>189</sup> EC (2023), <u>Transport infrastructure: over EUR 352 million of EU funding to boost greener mobility.</u>

<sup>190</sup> EU (2024), CEF Transport Alternative Fuels Infrastructure Facility (AFIF) call for proposal.

<sup>&</sup>lt;sup>191</sup> ACI-E (2020), Sustainability Strategy for Airports.

<sup>&</sup>lt;sup>192</sup> ACI-E (2024), What is Net Zero? – ACI-E Net Zero Resolution 2024.

<sup>&</sup>lt;sup>193</sup> Net zero carbon dioxide (CO<sub>2</sub>) emissions are achieved when CO<sub>2</sub> emissions from human activities are balanced globally by CO<sub>2</sub> removals from human activities over a specified period. Net zero CO<sub>2</sub> emissions are also referred to as carbon neutrality.

<sup>&</sup>lt;sup>194</sup> ACI-E (2022), Repository for airport net zero CO<sub>2</sub> roadmaps.

sions from others operating at the airport which are the largest share of emissions (e.g. aircraft, surface access, staff travel) was published 195 and this was followed in 2023 with guidance on developing Net Zero carbon roadmaps 196.

#### STAKEHOLDER ACTIONS

## **Airport Carbon Accreditation Programme**

The Airport Carbon Accreditation (ACA) programme 197 was launched in 2009 by the Airports Council International Europe and, as of June 2024, includes 564 airports on a global basis. The ACA is a voluntary industry led initiative, overseen by an independent Administrator and Advisory Board, that provides a common framework for carbon management with the primary objective to encourage enable airports to reduce their CO<sub>2</sub> emissions. All data submitted by airports is externally and independently As of the latest 2022-2023 reporting period, there

accreditation

and

now

verified. were

290 European airports participating in the programme corresponding to 77.8% of European passenger traffic (Figure 6.5.3).



Figure 6.5.3 European airports participating in the ACA programme.

The ACA programme was initially structured around four levels of certification (Level 1: Mapping, Level 2: Reduction, Level 3: Optimisation; Level 3+: Neutrality) with increasing scope and obligations for carbon emissions management (Scope 1: direct airport emissions, Scope 2: indirect emissions under airport control from consumption of purchased electricity, heat or steam and Scope 3: emissions by others operating at the airport such as aircraft, surface access, staff travel).

<sup>&</sup>lt;sup>195</sup> ACI-E (2022), Guidance on Airports' Contribution to Net Zero Aviation.

<sup>196</sup> ACI-E (2023), Developing an Airport Net Zero Carbon Roadmap.

<sup>&</sup>lt;sup>197</sup> ACI-E (2022), Airport Carbon Accreditation programme.

In 2020, Levels 4 (Transformation <sup>198</sup>) and 4+ (Transition <sup>199</sup>) have been added as interim steps towards the long-term goal of achieving net zero CO<sub>2</sub> emissions and to align it with the objectives of the Paris Agreement. Guidelines were also published to inform airports about offsetting options, requirements and recommendations, as well as dedicated guidance on the procurement of offsets.

In 2023, a new Level 5 was added to the ACA programme. When applying for Level 5 airports are required to reach and maintain  $\geq$  90% absolute CO<sub>2</sub> emissions reductions in Scopes 1 and 2 in alignment with the ISO Net Zero Guidelines, as well as commit to achieving net zero CO<sub>2</sub> emissions in Scope 3 by 2050 or sooner. Any residual emissions need to be removed from the atmosphere through investment in credible carbon removal projects. To support airports in this endeavour, an update to the Airport Carbon Accreditation Offset Guidance Document<sup>200</sup> was published on carbon removal options and most effective removal strategies. Level 5 accredited airports need to outline detailed steps to achieve their emissions reduction targets, as part of their Carbon Management Plan.

Level 5 also requires airports to submit a verified carbon footprint for Scopes 1 and 2, and all relevant categories of Scope 3 as per the requirements of the GHG Protocol Guidance  $^{201}$ , notably covering all significant upstream and downstream activities from third parties, including airlines. Finally, airports must establish a Stakeholder Partnership Plan underpinning their commitment to net zero  $CO_2$  emissions in Scope 3, by engaging with the entire airport ecosystem and actively driving third parties towards delivering emissions reductions with regular milestone to gauge progress.

Ten airports were certified against Level 5 at launch, including 9 European airports (Amsterdam Schiphol, Eindhoven, Rotterdam-The Hague, Beja, Madeira, Ponta Delgada, Göteborg Landvetter, Malmö and Toulon-Hyères). Ivalo, Kittilä, Kuusamo and Rovaniemi airports were also subsequently accredited to Level 5 in 2024.

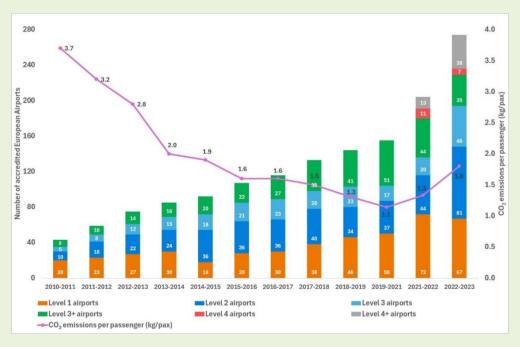


Figure 6.5.4 Increasing number of accredited European airports and decreasing CO<sub>2</sub> emissions per passenger

<sup>&</sup>lt;sup>198</sup> Definition of a long-term carbon management strategy oriented towards absolute emissions reductions and aligned with the objectives of the Paris Agreement. Demonstration of actively driving third parties towards delivering emissions reductions.

<sup>&</sup>lt;sup>199</sup> All Levels 1 to 4 plus offsetting of the residual carbon emissions over which the airport has control.

<sup>&</sup>lt;sup>200</sup> ACA (2023), Offset Guidance Document.

<sup>201</sup> GHG Protocol (2025), Scope 2 and 3 Calculation Guidance.

The carbon emission per passenger travelling through European airports at all levels of Airport Carbon Accreditation has increased to **1.8 kg CO<sub>2</sub>/passenger** (Figure 6.5.5). A total reduction in Scope 1 and 2 emissions compared to a three year rolling average<sup>202</sup> of **452,893 tonnes of CO<sub>2</sub>** for all accredited airports in Europe was also reported (Figure 6.5.4). This represents about 20% reduction compared to the three-year rolling average.

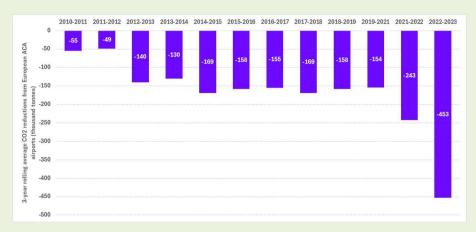


Figure 6.5.5 Scope 1 and 2 emissions reductions in airport CO<sub>2</sub> emission

Further developments in the ACA programme are envisaged in 2025 that will focus on the efforts of airport supply chains to reduce their CO<sub>2</sub> emissions.

#### **STAKEHOLDER ACTIONS**

#### Airport Council International Europe (ACI EUROPE)

ACI EUROPE represents over 500 airports in 55 countries, which accounts for over 90% of commercial air traffic in Europe. It works to promote professional excellence and best practice amongst its members, including in the area of environmental sustainability.



#### **Digital Green Lane**

The Digital Green Lane<sup>203</sup> was launched in 2023 and is a fully digital system for the delivery and collection of goods between freight forwarders and ground handlers, facilitated using cloud-based applications. This process offers numerous benefits, including shorter waiting times for the trucks that deliver and collect goods, a reduction in CO<sub>2</sub> emissions, increased transparency and less paper. The Digital Green Lane was further expanded by cargo community organisation Air Cargo Belgium and some 95% of all cargo in the Brussels Airport cargo



zone is now processed via this system. A pilot programme incorporating this same system has also been launched at Athens airport.

<sup>&</sup>lt;sup>202</sup> Emissions reductions have to be demonstrated against the average historical emissions of the three years before year 0. As year 0 changes every year upon an airport's renewal/upgrade, the three years selected for the average calculation do so as well. Consequently, airports have to show emissions reductions against a three-year rolling average.

<sup>&</sup>lt;sup>203</sup> Air Cargo Belgium (2024), <u>Digital Green Lane</u>.

#### Airport Regions Council (ARC)

ARC is an association of local and regional authorities hosting or adjacent to both major hub airports and smaller airports. The organisation's



is at the intersection of airport operations and local/regional policies, and it supports maximising benefits and minimising environmental impact, ultimately striving to improve the well-being of residents in airport regions.

#### **Digital Twin**

Within the EU Horizon 2020 research project 'Stargate' IES and Brussels Airport have developed a Digital Twin of the airport's 40 most energy-intensive buildings before modelling scenarios such as installing solar panels, electric vehicle chargers and replacing gas boilers with heat pumps to find the most effective routes to net zero carbon emis-



sions by 2030. This marks a significant step up from the current use of digital twin technology, where it has most commonly been used to optimise commercial operations. Through rigorous modelling stages, it was verified that energy saving measures had the potential for up to 63% CO $_2$  savings against the 2019 baseline year. This approach will also be replicated at Athens, Budapest and Toulouse airports and promoted across ARC Members.

## Non-Governmental Organisations (NGOs)

Environmental NGOs are actively involved in policy-making discussions to address the environmental impacts of aviation. They communicate civil society concerns and positions associated with noise, air pollution, climate change and social justice. They also contribute to raising awareness on aviation's environmental impact through transparency of data.



#### Tracking progress of business travel emissions savings



Travel Smart is a global campaign aiming at reducing corporate air travel emissions by 50% or more from 2019 levels by 2025, led by a coalition of NGOs in Europe, North America and Asia. The campaign ranks over 327 companies based on the sustainability of their business travel practices and holds them accountable through an Emissions Tracker<sup>205</sup>. This tool uses Carbon Disclosure Project<sup>206</sup> corpo-

rate emissions database and allows users to track the progress of a company's business air travel emissions reduction target.

The tracker shows through coloured bars whether companies have returned to levels of emissions above their targets or whether they have maintained reductions of -50% or more, thereby highlighting leaders and incentivising competition between companies. Through this Travel Smart campaign, various company best practices have highlighted that reducing flying is compatible with continued development of profitable business<sup>207</sup>.

<sup>&</sup>lt;sup>204</sup> STARGATE (2025), <u>Digital Twin</u> project.

<sup>&</sup>lt;sup>205</sup> Travel Smart (2025), Emissions Tracker.

<sup>206</sup> CDP (2025), Carbon Disclosure Project.

<sup>&</sup>lt;sup>207</sup> Travel Smart (2025), <u>Case Studies</u> of company best practices.

#### D) Areas of International Collaboration

The aviation sector has a long-standing history of making use of International Cooperation through technical cooperation programmes to grow the capabilities of States in the areas of safety, security and ATM, and EU entities are trusted and experienced partners in those initiatives.

During the last decade, the number of technical cooperation programmes dedicated to environmental protection has grown in line with the increasing ambitions of States to mitigate the environmental impact of aviation. European entities have been key contributors to this having collaborated with 112 Partner States and committed an estimated €20 million in civil aviation environmental protection projects since 2022. At global level, ICAO has developed technical capacity building programmes, such as ACT-CORSIA and ACT-SAF, which offer a common umbrella to the capacity building efforts in environment<sup>208</sup>. The contribution of the European Commission to these programmes amounts to €56.5 million<sup>209</sup>, including €9.6 million in projects directly implemented by ICAO. The European States and the European industry are also contributing to these ICAO programmes.

These European projects, implemented by EASA, European States, European Industry or directly by ICAO with European funds, have supported capacity building in numerous regions covering various technical topics that are summarised in this section. Building on this, there is a commitment to continue engaging through International Cooperation initiatives to pursue sustainable aviation on a global basis.

CORSIA Implementation: The initiatives of EU entities, either through the ICAO ACT-CORSIA pro-

gramme or through dedicated technical cooperation projects, have contributed to the increasing numbers of States volunteering to take part in COR-SIA during the Pilot Phase (2021-2023) and First Phase (2024-2026) by facilitating the implementation of the Monitoring, Reporting and Verification (MRV) process and in some cases the development of their National accreditation process.



As described in detail within Chapter 4 on Market-Based Measures, COR-SIA has now entered the First Phase (2024-2026) where, after the recovery

of air traffic following the COVID-19 pandemic, the scheme is likely to lead to offsetting obligations for aeroplane operators flying between two volunteering States. CORSIA offers two ways to perform the offsetting, either by purchasing and cancelling CORSIA Emission Units (CEU) or by using CORSIA Eligible Fuels (CEF). In both cases, specific criteria and rules apply to CEU or to CEF production in order to deem them as eligible offsets. While CEU and CEF can be purchased worldwide, States are looking to benefit from the environmental and economic benefits of CORSIA by providing CEU and CEF on a domestic basis.

Increasing commitments of States under the Paris Agreement through their National Determined Contributions (NDC) may result in greater competition for the use of CEU within international markets. As such, technical cooperation is also playing an important role to facilitate the understanding of the complementarity of CORSIA with other carbon markets, enabling positive synergies to maximise their intended goals and avoiding potential double-counting of emissions and emission cancellations. The cooperation between European entities and Partner States in the period 2025-2027 is expected to focus on the sound implementation of the offsetting mechanisms under CORSIA and facilitating an increase in the availability of carbon projects providing CEU.

<sup>209</sup> Some of the projects covered environment among other activities but were not fully dedicated to environment matters.

<sup>&</sup>lt;sup>208</sup> ICAO (2024), <u>ACT-CORSIA</u> and <u>ACT-SAF</u>.

#### Mr Jame E. Empeno

#### **Director, Philippines Accreditation Bureau**

"The Philippine Accreditation Board (PAB) has worked hand in hand with EASA and with the Thai

Industrial Standards Institute (TISI) to develop and implement the CORSIA Accreditation Process. The combination of expertise between the three parties, sponsored by the EU-SEA CCCA CORSIA Project, has provided the necessary conditions for us to embark into this new area as an organisation, and to achieve the first accreditation of a Verification Body in the Philippines. This collaboration between PAB, EASA and TIITISI is an excellent example of sharing expertise and resources, thus enabling the growth of the accreditation and verification capabilities in ASEAN, which is a key area to ensure the sound and economical implementation of CORSIA within our region."



SAF Development: The development of Sustainable Aviation Fuels (SAF) is the most cost-effective measure and has the biggest potential to significantly reduce the carbon footprint of air transport in the short- and long-term. The carbon reduction of SAF is on a life cycle basis.

The 3<sup>rd</sup> ICAO Conference on Alternative Aviation Fuels (CAAF#3) in 2023, called as part of the efforts to achieve the LTAG, resulted in its Member States adopting the "Global Framework for Sustainable Aviation Fuels (SAF), Lower Carbon Aviation Fuels (LCAF) and other Aviation Cleaner Energies" which includes an objective to reduce the emission of air transport of 5% by 2030 thanks to SAF and other cleaner energies<sup>210</sup>. As part of this Framework, it was acknowledged that support to States and industry to develop end finance SAF initiatives is essential to ensure that "No Country is



Left Behind" in the decarbonisation efforts. As such, the ICAO ACT-SAF Programme was established to support States in developing their full potential in SAF, through specific training activities, development of feasibility studies, and other implementation support initiatives.

A rapid and geographically balanced scaling up of SAF production requires both significant investments and well-informed decision-making. In this regard, EU entities are advocating and supporting the development of SAF within 42 Partner States in Africa, Asia and Latin America through different International Cooperation initiatives.

The first stage of this support is to raise awareness, to exchange best practices and to develop technical capabilities on SAF. The second stage involves supporting the development of local capabilities to enable local SAF production.

As part of the first stage, EU funded projects have been facilitating SAF workshops and webinars around the world and has also funded, via projects implemented by ICAO, 7 SAF Feasibility Studies - for Kenya, Trinidad and Tobago, Dominican Republic, Burkina Faso, Zimbabwe, Côte d'Ivoire and

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<sup>&</sup>lt;sup>210</sup> ICAO (2023), <u>ICAO Global Framework for Sustainable Aviation Fuels (SAF)</u>, <u>Lower Carbon Aviation Fuels (LCAF) and other</u> Aviation Cleaner Energies.

Rwanda<sup>211</sup> <sup>212</sup> <sup>213</sup> <sup>214</sup> <sup>215</sup> <sup>216</sup> <sup>217</sup>. Beyond Feasibility Studies, the technical cooperation initiatives from EU entities have facilitated bringing all relevant stakeholders together in order to develop a common understanding on SAF, the potential of SAF within their State and what their role could be in the development of local SAF production. This has covered the entire value chain of SAF including the different pathways for production, technoeconomic analyses, readiness studies and policy dialogues. Depending on the State profile, the support and collaboration has been tailored towards its specific potential for SAF production (e.g. analysing the activation of specific feedstocks, taking advantage of existing refining capabilities, potential use of electricity from renewable sources) and assessing at high level the technoeconomic viability of possible production pathways.

Similarly to the support provided on State Action Plans for CO<sub>2</sub> emissions, the most valuable contribution has been to facilitate a common understanding on SAF among the potential SAF actors in a State, and more crucially among different Governmental Departments (e.g. Ministries of Energy, Transport, Environment, Finance, Civil Aviation Authorities) and non-aviation stakeholders (e.g. gas and oil industry, feedstock producers).

In the framework of the EU Global Gateway strategy, EU entities have now reached the start of the second stage with the funding by the European Commission of SAF projects in 15 Partner States: Cameroun, Cote d'Ivoire, Egypt, Equatorial Guinea, Ethiopia, Kenya, India, Madagascar, Mauritania, Morocco, Mozambique, Nigeria, Rwanda, Senegal, South Africa. These projects will be implemented by ICAO and by EASA and aim to support them in achieving local SAF production projects.

The funds are being committed under the EU Global Gateway strategy and contribute to ICAO's ACT-SAF programme and other technical cooperation projects that follow a similar approach. The support initiatives are discussed and agreed with the Partner States in order to map out the main areas of potential collaboration:

- **Developing and managing the SAF programme at State level**, including the definition of the SAF Roadmap, organising the stakeholder engagement and launching communication campaigns to explain the need of SAF for decarbonisation of air transport.
- Designing and deploying the most adequate SAF framework, as a set of State initiatives providing favourable conditions for SAF production projects to become viable (e.g. SAF policies, financial initiatives, capacity building), starting with having a good understanding of the State's potential in the form of a feasibility study.
- Defining viable Direct Supply Lines (SAF production and supply projects), assessing the
  technoeconomic viability of different scenarios, identifying challenges and defining actions at State
  level (e.g. SAF policies or regulations, incentive schemes, research on sustainability of feedstocks) or at project level (e.g. adjusting technologies, establishing partnerships, securing feedstocks) for those production projects to become viable.
- Facilitating access to finance, enabling the bankability of the SAF production project by derisking investment and accessing dedicated funds (e.g. Development Banks, EU Global Gateway).

The initiatives are following and contributing to the development of ICAO's ACT-SAF programme framework, templates and tools. This collaborative work is providing a common and harmonised toolkit that helps both the Partner States and relevant stakeholders match needs and supporting resources in

<sup>&</sup>lt;sup>211</sup> ICAO (2018), <u>Kenya</u> – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>212</sup> ICAO (2018), <u>Trinidad and Tobago</u> – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>213</sup> ICAO (2018), Dominican Republic – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>214</sup> ICAO (2018), <u>Burkina Faso</u> – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>215</sup> ICAO (2023), Zimbabwe – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>216</sup> ICAO (2023), Cote d'Ivoire – Feasibility study on the use of SAF.

<sup>&</sup>lt;sup>217</sup> ICAO (2023), Rwanda – Feasibility study on the use of SAF.

a more agile manner, and allows for more efficient cooperation, even with multiple and concurrent partners.

This coordination is deemed essential to maximise the output of the resources dedicated to the upscale of SAF production worldwide.

#### Mr Emile Arao

#### Director General, KCAA, Kenya

"SAF will be a key element in the ability of the aviation sector to increase its sustainability in mid to

long-term. It is also an opportunity for countries to develop their green economy and to gain greater independence in a strategic area. However, the complexity of the product, the interdependencies with other economic sectors and the strategic decisions that are required to start producing SAF locally, requires coordination across a wide range of expertise in order for a Government to make the right decisions. The collaboration with international partners, such as the European Union, European States and Organisations, is crucial to maximise the use of available resources that can facilitate Kenya in its ambition to be one of the first countries in Africa to produce SAF at a commercial scale. Under the SAF Steering Committee, Kenya ensures an



orchestrated collaboration among all partners, establishes clear leadership and milestones and allows for transparency in achieving this ambitious but exciting endeavour."

#### E) Environmental Management Systems for Airports

As defined by ICAO, an Environmental Management System (EMS) provides a methodology and framework to systemically identify and cost-effectively manage significant environmental aspects in the operation of aviation organisations. It has been proven effective across a wide range of organisations, including airports, air carriers, manufacturers and government agencies. EMS is one of the tools available for managing environmental matters at an airport, along with sustainability plans, certifications and other processes.

Through the support from EU funded projects to the ASEAN Member States, Thailand, Laos PDR, Philippines, Indonesia and Vietnam have all developed technical capacity for the implementation of EMS in selected airports of their network. The support provided through a series of training sessions, and the exchange of experiences between airport officials, has facilitated the local implementation of the EMS and the progressive transformation of airport infrastructure to reduce its environmental impact.

As an example, lloilo Airport in the Philippines was supported in developing and implementing their EMS, including associated manuals, processes and action plans, which led to certification against ISO14001 in 2023<sup>218</sup>. This attested to a well-established system and the commitment from airport senior officials to mitigate the impact of the infrastructure and its operation on the environment and surroundings. The environmental team from lloilo Airport, together with the Civil Aviation Authority of

<sup>&</sup>lt;sup>218</sup> CAAP (2023), <u>award of ISO14001 Certificate</u> to Iloilo International Airport

Philippines (CAAP) and the support of EU Projects, has subsequently developed an EMS implementation package to support CAAP in progressively rolling out the EMS across the airport network from 2024 onwards.

The implementation of EMS is location specific and faced different scenarios and environmental challenges at each airport. For example, Luang Prabang Airport in Laos PDR is an airport surrounded by UNESCO sites where the need to respect the local cultural heritage was essential during the implementation of their EMS.

All the expertise accumulated in the various EMS implementations is being shared among the ASEAN Member States in thematic workshops facilitated by EU funded projects, and in a dedicated workstream at ASEAN level led by the ASEAN Air Transport Working Group (ATWG).

#### F) Global Gateway

The European Commission is promoting the green transition externally, aiming to combat climate change and to minimise threats to the environment in line with the Paris Agreement together with Partner States. This includes notably the so-called Global Gateway strategy.



Global Gateway will foster convergence with European or international

technical, social, environmental and competition standards, reciprocity in market access and a level playing field in the area of transport infrastructure planning and development. It will serve to enhance the recharging and refuelling infrastructure for zero-emission vehicles and foster the supply of renewable and low-carbon fuels. It will serve to strengthen aviation and maritime links with key partners, while also setting new standards to enhance environmental and social sustainability, create fair competition and reduce emissions in those sectors.

Air transport is acknowledged as a hard to decarbonise sector, while at the same time global air traffic is projected to continue growing, contributing to economic and social growth. This increase in air traffic will increase total aviation emissions if no action is taken. To face this challenge, acknowledging SAF as a cost-effective measure with the potential to significantly reduce the carbon footprint of air transport in the short- and long-term, increased availability and use of SAF outside of Europe has become a strategic objective for the EU. SAF also has a high potential to contribute to the economic development of States, notably in Africa, and to reduce their dependence on imported energy sources.

In December 2023, the European Council endorsed the list of Global Gateway flagship initiatives for 2024, including the global development and use of  $SAF^{219}$ , in line with the strategy's pledge to enhance sustainable transport connections. This will support achieving the objectives of both the Long-Term Aspirational Goal of net zero  $CO_2$  emissions from international aviation by 2050 and the ReFuelEU Aviation Regulation mandate that 70% of fuel supplied by 2050 must be SAF.

The recognition of SAF as a strategic priority provides the opportunity to access dedicated funds that can help reduce the investment gap for sound SAF production projects in Partner States.

#### G) Aviation Environmental Project Coordination Group (AEPCG)

Mindful of the need to maximise the impact of the technical and financial resources made available to Partner States, the European Commission (EC) and the European Union Aviation Safety Agency (EASA) established the Aviation Environmental Projects Coordination Group (AEPCG) in 2020 as a forum to raise awareness and facilitate the coordination of international cooperation support being delivered by EU Entities.

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<sup>&</sup>lt;sup>219</sup> EU (2022), Global Gateway flagship projects.

The AEPCG meets twice a year with an increasing number of participants<sup>220</sup> and initiatives being discussed. While the initial intent of the group was to raise awareness and facilitate coordination, the discussions among the group identified synergies in the implementation of CORSIA and the development of SAF. For example, following the provision of technical support to Cambodia that was coordinated between DGAC France and an EU funded project (EU-SEA CCCA CORSIA Project), the Partner State decided to join CORSIA during its voluntary phase. Looking forward, similar synergies are being developed in the concurrent support of the EU and the Government of the Netherlands to the SAF development in Kenya through the ACT-SAF Programme.

This close coordination and collaborative spirit among support partners will be a key factor in successfully meeting future environmental goals.

## VII National Measures

FOCA organised for the initial submission of the State Action Plan an event for aerodromes, air traffic control and aviation industry stakeholders. The aim of this event was to inform all relevant parties in the Swiss aviation system about the ICAO State Action Plan and to evaluate possible measures to reduce CO<sub>2</sub> emissions undertaken by these stakeholders. For the following update of the Swiss State Action Plan FOCA contacted the relevant stakeholder directly and as the State Action Plan was already known as an important instrument to show the effort Swiss stakeholder are undertaking, the submitted national measures were numerous.

Most of those measures are done on a voluntary basis to optimise operations and business in general. If a measure is part of a supra-national measure, the emissions reduction is taken into account at the supra-national level. Nonetheless as the contribution of Swiss stakeholder is essential to the measure, it will be described detailed in the national section.

All these measures are summarised in section VII. Where possible, calculations were made to estimate the achievable reduction in CO<sub>2</sub> emissions. It is rather difficult to eliminate double counting. Wherever possible, double counting has been tried to be avoided.

## 7.1 Aircraft Technology

#### 7.1.1 Purchase of new aircraft

The substitution of existing engines with more fuel-efficient engines reduces mainly the fuel flow and with that the CO<sub>2</sub> emissions of the aircraft of the respective operators. A measure taken by Swiss operators in conjunction with the goal to increase fuel efficiency and hence to reduce their CO<sub>2</sub> emissions is to partly renew their fleet.

From 2016 to 2021, SWISS replaced its Avro RJ100 short-haul aircraft fleet with the new Airbus A220, formerly Bombardier C Series (Type A220-100 and A220-300). With its state-of-the-art power plant (Pratt & Whitney PW1524G) as well as its system and material technologies, SWISS's Airbus A220 sets benchmarks in terms of its operating economics and its environmental credentials (current fleet: 9 A220-100, 21 A220-300). The company's Operational Efficiency & Analytics team confirms that the new aircraft type consumes up to 22 percent less kerosene than its predecessor aircraft on the routes concerned. This represents a net saving of 125 000 t of kerosene which means about 395 000 t of CO<sub>2</sub>. Between 2016 and 2020, SWISS complemented its long-haul aircraft fleet, with 12 Boeing 777-300ER. Through new technology the new jets consume approx. 20% less fuel per passenger than the Airbus A340. Following the commissioning of the two new aircraft, the SWISS long-haul fleet will comprise a total of 12 Boeing 777-300ERs, five Airbus A340-300s and 14 Airbus A330-300s. Through new technology the new jets consume about 18% less CO<sub>2</sub> per passenger in comparison to A340 operations. In February 2020 SWISS started to replace its Airbus A320-fam fleet with A320neos. The Airbus A320neo offers significant environmental performance improvement with substantially less CO<sub>2</sub>-emissions (20%) and nearly 50% reduction in noise footprint compared to previous generation aircraft. SWISS has chosen the PW1100G Geared Turbofan (GTF) engine to power its Airbus A320neo and A321neo aircraft (current fleet: 3 A320neo, 2 A321neo; on order: 14 A320neo, 6 A321neo (expected phase-in: 2021-2025)). Estimated CO₂ reduction of approximately 20% compared to A320neo operations.

Helvetic Airways AG is renewing and expanding their fleet with aircrafts of new type from same manufacturer (old aircrafts E190/195, new aircrafts E290/295). An estimation of emissions reductions assumes a benefit of 3 600 t CO<sub>2</sub> per year and aircraft from E190/195 to E290/295.

Edelweiss Air will invest a three-digit million CHF amount in modernising its fleet over the next few years. The estimated benefit of this measure is around 17% CO<sub>2</sub> reduction once the modernisation of the fleet is completed.

The introduction of new aircraft with more efficient engines can lead to reductions in CO<sub>2</sub> emission;

however, the seating capacity will usually be increased as well, and the reduction effect will be nullified.

## 7.1.2 Retrofitting and upgrade improvements on existing aircraft

AeroShark Riblet films to improve aerodynamics: Applying Riblet films (also known as Sharkskin) to the aircraft fuselage reduces the drag of the aircraft and therefore fuel consumption. SWISS International Air Lines calculated for this measure an approximate CO<sub>2</sub> saving about 10 000 t per year.

## 7.2 Sustainable Aviation Fuels and cleaner energies

The deployment of Sustainable Aviation Fuels is one of the most promising approaches to significantly reduce the climate impact of air transport. This is stated in the Swiss long-term climate strategy, for which the FOCA was commissioned to draw up a "Report on fostering the development and uptake of sustainable aviation fuels" as part of the Action Plan 2021-23 of the "Sustainable Development Strategy 2030". This report was published in December 2022 by FOCA<sup>221</sup>. Three objectives for the deployment of SAF are formulated in this report:

- The first objective involves a reduction of fossil CO<sub>2</sub> emissions from aviation through the use of SAF in Switzerland by at least 60 % by 2050 (compared to a development without any measures). The remaining emissions must be reduced through further measures, including efficiency improvements, alternative forms of propulsion and, possibly, NET. In order to establish a SAF market in Switzerland, which has not been achieved with previous measures, a blending obligation is to be set down in legislation.
- The second objective concerns the development of SAF production pathways: these should be
  able to quickly provide large quantities of sustainable and low-cost aviation fuels. Decisive support
  is needed in the near future. In the medium term, the focus should be on promoting pilot and
  demonstration plants with Swiss participation, which would also close a gap in the existing funding
  instruments.
- The third objective aims to overcome the obstacles to the uptake of SAF in Switzerland. Administrative barriers to trade that exist for the import of SAF into Switzerland as well as for the provision of sustainability certificates are to be swiftly removed. The Federal Office for Civil Aviation, together with its partner offices, continues to optimise the collaboration among Swiss stakeholders.

The revised Swiss CO<sub>2</sub> Act<sup>222</sup>, which came into force at the beginning of 2025, provides for the introduction of a blending obligation. Switzerland introduces a blending mandate by 1<sup>st</sup> January 2026 through the bilateral agreement on aviation with the EU and implements it with corresponding rules to those of the EU.

Zurich Airport has successfully enabled a demonstrator project in early 2020 with the delivery of a biogenic SAF-blend to Zurich Airport. In the context of the World Economic Forum's Annual Meeting, Zurich Airport and an FBO have delivered a 36%-SAF-blend for use in business jets. The reduction achieved by this demonstrator project was 115 t of CO<sub>2</sub> in 2020. Additional benefits in 2021 (11 600 t) and 2023 (52 t). Based on the project, Zurich Airport has continued to develop and build the standard-regular import and delivery process for SAF into Switzerland.

SWISS International Air Lines offers its private and business customers various options for reducing part of the emissions from their air travel by using sustainable fuels. The SAF used is manufactured in compliance with the sustainability criteria of the European Renewable Energy Directive 1018/2001/EU Article 20 (RED II) and is certified according to the ISCC or RSB criteria. The used SAF reduces greenhouse gas emissions by at least 80% compared to kerosene using fossil origin materials.

<sup>&</sup>lt;sup>221</sup> Report by FOCA on fostering the development and uptake of sustainable aviation fuels

<sup>&</sup>lt;sup>222</sup> Federal Act on the Reduction of CO2 Emissions <u>SR 641.71 - Federal Act of 23 December 2011 on t... | Fedlex</u>

## 7.3 Operational improvements

#### 7.3.1 More efficient use and planning of airport capacities

Working within the SESAR framework, SWISS, Skyguide and Zurich Airport have developed an innovative approach procedure that significantly reduces CO<sub>2</sub> emissions. First started under the name "Greener Wave" 223, and continued as "iStream", the Very Large Scale Demonstration Project xStream started in 2018 and developed further the concept and implemented it on a durable way. Reintroduced by Skyquide in March 2023, after having been stopped since March 2020 due to reduced traffic during the COVID-19 crisis. The first arrival wave after the LSZH night curfew is again successfully being steered through close cooperation between the different stakeholders via the xStream procedure.

Through the application of the Target Time concept, the arrival flow into Zurich airport from 6am until 7am local time is optimized on a daily basis. The process aims at avoiding unnecessary holdings and optimizing the flight profiles of each flight during the aforementioned period. Prior to iStream implementation, a daily race to the IAF took place, resulting in aircraft holding in the vicinity of LSZH. With the procedure, all arriving flights are assigned a target time over the IAF, resulting in an early coordinated arrival sequence.

During the COVID-19 crisis, the reduced traffic numbers did not require the use of the xStream procedure, but with the strongly increased flight numbers in the first arrival wave, the reintroduction has been successfully performed. SWISS continues to actively participate and improve the procedure, by implementing the necessary measures for crews to coordinate the take-off time as well as adjusting the flight speed after departure to meet the indicated target times. xStream reduces approximately 1'800 t of CO<sub>2</sub> per year for the SWISS arrivals in the first wave.

7.3.2 More efficient ATM planning, ground operations, terminal operations (departure, approach and arrivals), en-route operations, airspace design and usage, aircraft capabilities.

Almost all of the measures concerning airspace are embedded in the wider context of projects such as FABEC and SESAR. Therefore, estimates of CO2 reduction are calculated on an international level and estimations on a regional level might thus be difficult. Nonetheless examples mostly implemented by Skyquide shall be listed under this chapter, but without an estimation of emissions reduction.

Free Route Airspace (FRA) in Upper Sectors: Free Route Airspace (FRA) is a specified airspace within which users may freely plan a route between a defined entry point and a defined exit point, with the possibility to route via intermediate (published or unpublished) waypoints, without reference to the ATS route network, subject to airspace availability. Within this airspace, flights remain subject to air traffic control. The FRA concept brings significant flight efficiency benefits and a choice of user preferred routes to airspace users. The main commissioning took place in 2023. Until 2026 cross-border improvements are planned.

AMAN Extended to en-route airspace for LSZH: Arrival management (AMAN) extended to en-route airspace extends the AMAN horizon from the 100-120 nautical miles to at least 180-200 nautical miles from the arrival airport. Arrival sequencing may be anticipated during en-route and early descent phases. Air traffic control (ATC) services in the TMAs implementing AMAN operations shall coordinate with air traffic services (ATS) units responsible for adjacent en-route sectors.

Arrival Manager (AMAN) in LSGG: The AMAN tools interact with several systems, including the host flight data processing system (FDPS) and surveillance data processing system (SDPS) resulting in a 'planned' time for any individual flight. Since the AMAN has certain conditions it needs to satisfy (such as the required landing rate, or spacing, on the runway), when 2 or more aircraft are predicted at or around the same time on the runway it plans a sequence, generating new 'required' times that need to be applied to the flight(s), in order to create/maintain the sequence. AMAN also outputs the required time for the ATCO in the form of 'Time To Lose (TTL)/Time To Gain (TTG)' information. The controller is then responsible for finding and applying an appropriate method (vectoring, path stretching, speed

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changes or holding) for the aircraft to meet its time or position in the sequence.

LORD - Leading Optimised Runway Delivery Tool: Support system for air traffic controllers to create the optimal minimum distances between the approaching aircraft. In case of high demand, holding time is reduced.

Flexible Letters of Agreement (LoA) / Flexible Use of Airspace (FUA): Flexible LoA improve flight efficiency according to spare sector capacity and to reduce CO<sub>2</sub> and NOx emissions. Today, whatever the level of traffic and the external factors, such as meteorological conditions or technical failure, the seasonal LoAs (valid for ~6 months) between 2 adjacent centres oblige the a/c to always respect the XFL. The a/c profile could be much more efficient if all known conditions at the time of the flight were taken into consideration to define the XFL and to offer the best possible profile.

OMASI Trial: The Route Availability Document (RAD) imposes an altitude restriction at the waypoint OMASI on traffic flows from France to Switzerland via airway UN871, resulting in descents having to be initiated before the optimum and most fuel-efficient Top of Descent (TOD). On SWISS Ops Research proposal, this specific RAD restriction was analysed by the French ANSP DSNA and Skyguide and a significant efficiency improvement could be achieved by coordinating a 2000 ft higher handover altitude at OMASI for a trial during the winter AIRAC cycle 2023/2024. After the successful trial in 2024, this adapted RAD will continue to generate fuel efficiency benefits for all flights affected by the restriction. In future, this measure will reduce CO<sub>2</sub> emissions by around 252 t per year.

SWISS International Air Lines optimizes block times to reduce high-speed flying. Adjusting the planned block times and taking the actual speeds flown into account with the aim of reducing the proportion of high-speed flights will cut CO<sub>2</sub> emissions by around 1 600 t of CO<sub>2</sub> per year.

Redesign TMA Zurich: In 2018, the FOCA initiated a redesign of Zurich airspace at the request of FZAG, Skyguide and SWISS International Air Lines. The basic design incorporates the results of the broad-based stakeholder involvement and the current requirements of the Swiss Air Force for the Dübendorf military airfield. It serves as a basis for further work such as safety assessments and for smoothing the CTR and TMA delineations in order to facilitate navigability in VFR traffic <sup>224</sup>. The new airspace structure came into effect on March 20, 2025. It meets the needs of commercial aviation, general aviation, the air force, and Germany.

AVISTRAT<sup>225</sup>: In mid-2016, FOCA was tasked with redesigning Swiss airspace and aviation infrastructure (air traffic control infrastructure and airports). FOCA is implementing this project through a program called the Swiss Airspace and Aviation Infrastructure Strategy, or AVISTRAT-CH for short. The strategy was published in spring 2022. The project is currently in the implementation phase.

#### 7.3.3 Collaborative research endeavours

SWISS is part of a consortium of airlines, air navigation service providers, aircraft manufacturers, and academia, contributing operational expertise to address the target conflicts from an air traffic management perspective. SWISS participates in the following Single European Sky ATM Research (SESAR) projects:

- CICONIA: Improvement of understanding of non-CO<sub>2</sub> effects and conducting analyses on how
  these can influence our flight planning in an operational context. The focus is on the trade-off between fuel optimized flight trajectories and additional fuel burn due to contrail avoidance, maybe
  leading to more CO<sub>2</sub> emissions. The project aims to learn how to handle this trade-off not only on
  single flights but also on a broader scale.
- HARMONIC: Development of a more proactive traffic flow management through the management
  of Target Times of Arrival, to better utilize the limited capacity of the air traffic system, especially at
  ZRH. It is expected that a better and more accurate coordination of the arrivals will lead in the future to less high-speed flights towards Zurich, as well as less holdings and vectoring, and thus reduce CO<sub>2</sub> emissions

<sup>224</sup> Redesign TMA Zurich

<sup>225</sup> AVISRAT-CH: Redesigning Swiss Airspace

- TRAJECTORY BASED OPERATIONS (TBO): Two closely related projects with the general goal to advance TBO. NETWORK TBO focusses on the pre-departure and strategic execution phase of a flight and the processes necessary to establish one common view on the trajectory between stakeholders such as Network Manager, Airline Flight Operations Center, ATC and Flight Crews. Through enhanced data exchange and negotiation processes, this allows for more fuel-efficient trajectories, more accurate flight planning and better capacity management as well as improving the flexibility to adapt flight trajectories for optimization, operational or flow management reasons during flight execution. ATC TBO focusses on the tactical execution phase, therefore on the exchanges between ATC Controller and flight crew. Using technological enablers such as ADS-C EPP and CPDLC, the developed tools will assist ATC Controllers in their decision-making. Through better trajectory predictions and enhanced data exchange as well as improved conflict detection and resolution, this project aims to improve safety, operational efficiency, fuel efficiency, capacity.
- DYN-MARS: Further development of an FMS prototype function for conducting idle descents using new communication systems such as FANS C (ADS-C EPP), CPDLC, and ground-based instruments like LORD.

As the above-mentioned measures are describing the participation in research projects, no estimation can be provided of possible CO<sub>2</sub> emissions reductions.

#### 7.3.4 Best practices in operations

Edelweiss Air is implementing in 2025 an inflight optimiser for variable Cost Index and Flight Level based on detailed wind model (EFB Application PACE FPO Cloud). Another application for the EFB that will be implemented this year is GE FlightPulse. This debriefing tool for pilots reviews their own practices regarding efficient flight procedures. As this is rather a general awareness campaign, no quantified savings were calculated.

Airline operators are continuously optimizing the interior of their aircraft in terms of weight gain. A weight reduction can be achieved by installing lighter materials such as new seats, lighter freight / baggage containers or lighter on-board equipment.

One example to reduce weight is to optimise the water uplift. An estimated CO<sub>2</sub> saving amounts to approximately 500 t per year for the fleet of Edelweiss Air.

SWISS International Air Lines is recording systematically the water consumption of their Boeing 777s. This has enabled them to optimise the amount of water used, saving an average of 165 litres of water per flight and reducing CO<sub>2</sub> emissions about 1 800 t per year.

SWISS International Air Lines estimates a saving around 4 000 t CO<sub>2</sub> with systematic weight reduction of aircraft properties and loaded materials ranging from Cargo ULDs and Light Weight Tyres to Inflight Magazines and Quick Reference Handbook (QRH).

Flight Planning Optimization (CG & Rounding): Optimisation of flight planning using variable centre-of-gravity values and the cascaded rounding of distances between two waypoints helps to calculate the planned fuel much more accurately, and uncertainty factors can be reduced. In addition, the optimisation of baggage and cargo loading for systematic optimisation of the centre of gravity contributes to reducing  $CO_2$  emissions SWISS International Air Lines calculated a yearly saving of around 6 800 t of  $CO_2$  for these two measures.

Airline operators encourage their pilots where possible to proceed single-engine taxiing (or two engine taxiing with A340), which reduces an estimated amount of 405 t of CO<sub>2</sub> per year for Edelweiss Air.

SWISS International Air Lines aims to save around 4  $000 \, t \, CO_2$  by the introduction of new Reduced Engine Taxi procedures (SETI/SETO) or by increasing the application rates through optimisation of procedures or communication and training push.

Edelweiss Air switches off the air conditioning pack during take-off whenever possible. This measure reduces an estimated 175 t of CO<sub>2</sub> per year.

In accordance with official Airbus Green Operating Procedures, SWISS International Air Lines uses only one Air Conditioning Pack per aircraft during taxi time, if applicable. This measure reduces an estimated 800 t of CO<sub>2</sub> per year.

Further technical and operational measures implemented by Edelweiss Air are reduced flaps during take-off and or landing depending on the aircraft type. This setting saves annually about 435 t of CO<sub>2</sub>.

SWISS International Air Lines reduces flap setting for take-off and landing. The Introduction of new reduced flap setting take-offs and landing procedures or increase in application rates through optimization of procedures or communication and training push will reduce the annual CO<sub>2</sub> emissions by round 1 800 t.

Edelweiss Air conducted a trial for optimised (higher) changeover flight level from Marseille LFML to Geneva LSGG in 2024. Preliminary results show a CO<sub>2</sub> reduction of 45 t, but further analysis in coordination with Skyguide and SWISS International Air Lines is needed.

Slow Step Climb: Modern aircraft engines are optimised for operation under typical cruising conditions. Based on performance modelling, it can be assumed that step climbs in cruise with the lowest possible thrust better approximate the optimal operating conditions of the engine and are therefore more fuel-efficient than "steeper" climbs with correspondingly high thrust settings. This measure of SWISS International Air Lines saves approximately 500 t of CO<sub>2</sub> per annum. In addition, the lower thrust has the side effect of reducing the noise level in the aircraft cabin, which should increase comfort for passengers and crew, especially on night flights.

Edelweiss Air conducts a trial of a Slow Step Climb for the A340 in oceanic airspace. It is too early to estimate the CO<sub>2</sub> saving at this stage.

Operations Decision Support Suite (OPSD): In collaboration with Google Cloud and Google Operation Research Team, SWISS International Air Lines and the Lufthansa Group developed the "Operations Decision Support Suite" (OPSD), with the Tail Assignment Optimizer as a key component. This cutting-edge Al-based tool is designed to enhance fuel efficiency, maximize revenue, and improve operational stability. The Tail Assignment Optimizer intelligently assigns aircraft to flight legs by evaluating a comprehensive set of factors, including fuel efficiency, passenger and cargo bookings, maintenance sched-ules, crew connection times, and ground buffer requirements. By optimizing each assignment, it minimizes total operating costs and fuel consumption, while ensuring seamless and efficient operations. This measure reduces about 5 500 t of CO<sub>2</sub> per year.

Reduced Contingency Fuel Planning: Introduction of reduced contingency fuel planning on selected long-haul routes in order to optimize pilots fuel decision and therefore reduce the remaining fuel endurance at landing. This measure reduces SWISS International Air Lines' estimated CO<sub>2</sub> emissions by approximately 2 000 t.

Edelweiss Air created a new position within the company. The Operational Efficiency Pilot is responsible for data analysis, promotion campaigns and evaluating further procedures and saving opportunities. In addition, Edelweiss Air conducts workshops for OPS Sustainability Pilots, who will act as promoters for sustainability and efficiency topics.

## 7.3.5 Functional Airspace Block Europe Central (FABEC)

The FABEC Member States (Belgium, Germany, France, Luxembourg, the Netherlands and Switzerland) signed in 2010 the Treaty relating to the establishment of the Functional Airspace Block "Central Europe" (FABEC Treaty)<sup>226</sup>. The FABEC Treaty involves all relevant civil and military authorities and constitutes the basis for establishing specific arrangements in the FABEC framework and for ensuring the development of common FABEC projects with the aim of improving the performance within the relevant airspace. The Treaty is a legal instrument facilitating direct cooperation and coordination among the authorities and Air Navigation Service Providers (ANSP).

FABEC airspace covers 1.7 million km² and handles more than 6 million flights per year – 55% of all

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<sup>&</sup>lt;sup>226</sup> Functional Airspace Block Europe Central FABEC

European air traffic. FABEC aims at reducing the environmental impact per flight by improving routes, flight profiles and distances flown, in line with the objectives of the Single European Sky Initiative.

In accordance with Single European Sky regulations, the FABEC states have agreed to draw up a joint FABEC performance plan, most recently for the third reference period (2020–2024). This plan, which sets common performance targets in the areas of flight safety (safety), capacity (delay) and environment, and was submitted in a revised version to the EU Commission for assessment in July 2022.

#### 7.4 Market-Based Measures

7.4.1 Participation of the State in the offsetting requirements of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

As all other ECAC Member States Switzerland has notified ICAO of its decision to voluntarily participate in CORSIA from the start of the pilot phase in 2021 (according to the "Bratislava Declaration"). In Switzerland six Aircraft Operators are above the threshold of 10'000 tonnes  $CO_2$  emissions per year on international routes (operated by aeroplanes with a MTOM > 5.7 tonnes, Humanitarian, medical and firefighting flights are excluded) and therefore have to monitor and report their  $CO_2$  emissions to FOCA.

7.4.2 Incorporation of emissions from international aviation into regional or national market-based measures, in accordance with relevant international Standards and instruments

The Swiss ETS: The agreement on the linking of the ETS of the EU and Switzerland was signed on 27<sup>th</sup> November 2017, ratified in 2019 and came into force in 2020. Since the entry into force, flights within Switzerland and from Switzerland to the European Economic Area (EEA) are subject to the Swiss ETS<sup>227</sup>, while flights from the EEA to Switzerland are subject to the EU ETS.

7.4.3 Emissions charges or modulation of LTO charges, in accordance with relevant international instruments

Aircraft engine emission charges, based on ECAC recommendation 27/4 and Swiss FOCA regulations follow the polluter-pays-principle and are based on the certification LTO emission mass of  $NO_x$  on an individual aircraft/engine basis. The charging scheme is revenue neutral, but levies are used to finance measures that reduce emissions from any airport related sources. This measure doesn't lead to less  $CO_2$  emissions but to better local air quality around airports.

In Geneva Airport three reduction mechanisms are put in place in order to incentive airlines to operate with the most modern aircraft and the best load factor: Landing charges are reduced for airlines operating narrow body aircraft in noise class 5 or wide body in noise class 4. There is an incremental bonus, for the replacement of older aircraft by newer aircraft and for airlines operating with a load factor of 80% or higher. This measure is not only targeting a reduction of CO<sub>2</sub> emissions but also noise and NOx reduction.

#### 7.4.4 Accredited offset schemes

Green Fare<sup>228</sup>: SWISS International Air Lines offers its private and business customers various options for offsetting the emissions from their air travel by using sustainable fuels (SAF) and/or by investing in climate protection projects. SWISS has further expanded its offering for more sustainable flying in 2023 and introduced the "Green Fare" on European flights. With this fare, compensation for flight-related CO<sub>2</sub> emissions is already included in the price. By the end of 2023, over 100,000 flights had been booked with the Green Fare. Furthermore, since September 2023, all domestic SWISS flights between Zurich and Geneva already include compensation for flight-related CO2 emissions in the price.

<sup>227</sup> Swiss Emissions Trading System for aircraft operators

<sup>228</sup> Sustainable choices | SWISS

In 2023, around 5 % of the airline's passengers opted for one of the offers for more sustainable flying. Their freight division Swiss WorldCargo has also introduced various new offers for more sustainable goods transport.

The Swiss federal administrative authorities are offsetting their CO<sub>2</sub> emissions for business trips by aircraft<sup>229</sup>. 2024 the amount for all departments was 15 400 t CO<sub>2</sub> emissions.

EuroAirport Basel-Mulhouse-Freiburg has committed to offsetting the remaining emissions from its own infrastructure (Scope 1 and 2 emissions) through CO<sub>2</sub> capture and storage projects in order to achieve net-zero emissions by 2030 at the latest<sup>230</sup>.

#### 7.5 Additional Measures

#### 7.5.1 Aviation and Climate Funding Program: distribution of funds

The revised Swiss CO<sub>2</sub> Act<sup>231</sup>, which came into force at the beginning of 2025, aims to promote the development and production of SAF (and synthetic SAF in particular) as well as further measures to reduce greenhouse gas emissions in aviation. To this end, the Federal Assembly has approved a commitment credit of CHF 390 million for the period from 2025 to 2030. The revised CO<sub>2</sub> Ordinance<sup>232</sup> contains the implementing provisions. The Federal Office of Civil Aviation is responsible for implementing the new aviation and climate promotion program.

The Aviation and Climate funding program aims to promote the implementation of climate protection measures in aviation. Measures to reduce CO<sub>2</sub> emissions in aviation can be divided into the following areas:

- 1. Technological improvements to aircraft to increase their efficiency
- 2. Operational improvements to increase efficiency
- 3. Use of sustainable aviation fuels (SAF)
- 4. Use of alternative propulsion systems, e.g. based on hydrogen or batteries as energy storage devices

In principle, it is possible to promote all measures to reduce the climate impact of air traffic that meet the criteria defined in the CO<sub>2</sub> Ordinance. The measures are assessed according to the below-mentioned criteria; in principle, no preference is given to certain technologies (technology neutrality).

Eligibility for funding is determined by the degree to which the following criteria are met:

- a. high potential for reducing greenhouse gas emissions;
- b. cost-effectiveness in terms of climate impact;
- c. low overall environmental impact;
- d. high market potential;
- e. high probability of success;
- f. high value added in Switzerland;
- g. eligibility of emission reductions for credit in Switzerland;
- h. presence of partners throughout the value chain;
- i. contribution to knowledge preservation and expansion.

In its examination of applications, the FOCA assesses whether the measure concerned qualifies for financial support and the necessary funding is available and specifies the maximum amount to be granted.

<sup>&</sup>lt;sup>229</sup> Resource and Environmental Management System of the Swiss Federal Administration (RUMBA).

<sup>&</sup>lt;sup>230</sup> EuroAirport Basel-Mulhouse-Freiburg: Roadmap zur Reduzierung der CO<sub>2</sub>-Emissionen

<sup>&</sup>lt;sup>231</sup> Federal Act on the Reduction of CO<sub>2</sub> Emissions: <u>SR 641.71 - Federal Act of 23 December 2011 on t... | Fedlex</u>

<sup>&</sup>lt;sup>232</sup> Ordinance for the Reduction of CO2 Emissions: SR 641.711 - Verordnung vom 30. November 2012 üb... | Fedlex

#### 7.5.2 ACI Airport Carbon Accreditation

Zurich airport has been accredited in the ACI EUROPE Airport Carbon Accreditation program at Level 4 since 2022, thus demonstrating its engagement but also towards the airport partners (starting 2010 at Level 3).

Geneva Airport is certified Airport Carbon Accreditation at level 3 since 2011. In 2017, Geneva Airport has upgraded its certification to level 3+. In this level, «compensation», Geneva Airport buys CO<sub>2</sub> certificate to compensate its remaining emissions each year. In 2024, Geneva Airport has upgraded its certification to level 4+. Compensation of the remaining scope 1 and 2 are bought each year since 2017. In the timeframe 2017 – 2024, more than 60 000 t of CO<sub>2</sub> have been compensated.

#### 7.5.3 Swiss Long-term climate strategy to 2050

The Federal Council adopted the long-term climate strategy for Switzerland on 27 January 2021 and has approved the submission of the strategy to the UN Climate Change Secretariat. Switzerland has thus fulfilled one of the terms of the Paris Agreement (Art. 4.19), which requires countries to develop long-term climate strategies with a time horizon up to 2050. In line with the scientific evidence, based on the Paris Agreement, in accordance with its 'highest possible ambition' and in view of specific economic and social requirements, Switzerland has set itself a long-term target also for aviation: International aviation from Switzerland should no longer generate climate-impacting emissions in net terms by 2050 as far as possible. This means: Fossil CO<sub>2</sub> emissions amount to net zero and the other climate impacts decline or are offset with other measures. In January 2025, the Federal Council adopted a supplement to the long-term climate strategy. This supplement accompanies the targets for 2035 (but without intermediate targets for aviation), which Switzerland also submitted to the UN Climate Secretariat in January 2025.

#### 7.5.4 Road Map Sustainable Aviation

The Aviation Research Center Switzerland (ARCS) launched the Swiss "Road Map Sustainable Aviation" project in 2020 and prepared a study together with the company Ecoplan. Representatives of SWISS, easyJet, the Swiss Business Aviation Association, the national airports of Zurich, Geneva and Basel, the federal offices FOCA and FOEN as well as the ETH Zurich and the Zurich University of Applied Sciences ZHAW accompanied the study. In the final phase of the project, the group was supplemented by easyJet. The study shows how the Swiss aviation industry can achieve the goals of the Paris Agreement and the Long-term climate strategy to 2050<sup>233</sup>.

Based on this study, SWISS, easyJet, the national airports and the Swiss Business Aviation Association have adopted a joint declaration of intent to reduce CO<sub>2</sub> emissions.

#### 7.5.5 Report on measures for the reduction of CO<sub>2</sub> emissions in aviation

The umbrella association AEROSUISSE published in June 2021 a report with an overview of different measures to reduce CO<sub>2</sub> emissions in the aviation sector. The measures include projects from areas of aircraft operations, airport infrastructure, air traffic management and sustainable aviation fuels. The report was developed in a collaboration with experts from airports, air navigation service providers, airlines, business jet operators and research institutes <sup>234</sup>.

## 7.6 Supplemental Benefits for Domestic Sectors

The measures that are listed in this part are not directly reducing the CO<sub>2</sub> emissions of international aviation and therefore cannot be added to the total reduction from those measures described above. Nonetheless these measures are directly linked to the aviation sector, and they undoubtedly have a positive effect on CO<sub>2</sub> emissions of Switzerland.

<sup>&</sup>lt;sup>233</sup> Aviation Research Center Switzerland: <u>Schweizer Road Map Sustainable Aviation</u>

<sup>&</sup>lt;sup>234</sup> AEROSUISSE Roadmap zu den CO<sub>2</sub>-Reduktionsmassnahmen im Luftverkehr

#### 7.6.1 Reduced energy demand and preferred cleaner energy source

Continuous building improvements at the national airport of Zurich and a range of energy savings measures have led to a stabilisation of the airport's energy demand over the past 30 years despite the increase in building area of 50% and traffic growth of 60%. Further improvements in the energy provision have led to a reduction of greenhouse gas emission from the airport's central power plant. In addition, there is an ongoing transition towards renewable energy sources as geothermal and renewable natural gas. An estimated annual amount of  $CO_2$  savings for this measure is 1 600 t from 2023 onwards.

Zurich airport currently has 12 photovoltaic-power plants in operation (2020) producing a total of 1.7 GWh/a (2020). This capacity will be increased to approximately 23 MWp, producing 23 GWh/a electricity.

Geneva Airport uses 100 % renewable electricity. Geneva Airport has installed solar panels for electricity and heat production. Currently, almost 23 000 m<sup>2</sup> of photovoltaic panels are installed, with an annual production of around 3 500 MWh per year. Geneva Airport has set the objective of producing 8 000 MWh/year in 2030 with the photovoltaic installations at the airport.

Geneva Airport is studying and taking measures to reduce energy consumption for the heating and cooling of its buildings. Such reduction is obtained by gradually improving the thermal insulation of existing buildings, by the renewal of the technical equipment, and the replacement of the main heating power plant. A masterplan of the building renovation has been established, with the goals of both decreasing energy consumption of the building and decarbonise this energy. One significant on-going project is the replacement of the current main heating fuel-based boilers by a thermal pump using the Geneva Lac water as a main thermal source. The goal is to be able to heat and cool all the airport buildings without any fossil fuel around year 2026. The CO<sub>2</sub> saving will be huge, has the heating station currently consumes 1,5 to 2 million litres of fuel per year.

EuroAirport Basel-Mulhouse-Freiburg introduced the purchase of green electricity (100% renewable and of European origin) in May 2020 – this requirement has been part of the specifications for purchasing electricity ever since. Furthermore, the natural gas-fired heating system will be replaced with a CO<sub>2</sub>-neutral solution (biomass heating plant of the municipal district heating network of Saint-Louis). And a new heating plant on the airport site will enable total requirements to be covered with a share of renewable energies of at least 88%). In addition, it is recommended that decentralized heating systems be gradually replaced by other systems<sup>235</sup>.

#### 7.6.2 Enhanced ground support equipment (GSE) management

Both national airports Zurich and Geneva have aircraft positions with pre-conditioned air (PCA) and electricity (400Hz). In Zurich Airport all terminal stands are equipped with 400Hz and PCA, most open stands are equipped with 400Hz systems. The use of the system is mandatory and is regulated in the AIP ZRH. The use monitored and annual benefit calculations are done. The airport of Zurich estimates a reduction of 42 000 t CO<sub>2</sub> per year from their aircraft stands.

Geneva Airport has equipped 30 aircraft positions with fixed 400 Hz and pre-conditioned air installation. The use of these facilities has been made mandatory at equipped positions. At the same time, the use of aircrafts APU is prohibited. In 2017, five new aircraft positions with 400 Hz power supply were opened. It is estimated that the use of these systems instead of APUs will save around 20,000 to 30,000 tons of  $CO_2$  annually. In  $2023\ 25\ 800\ t\ CO_2$  were saved. It is estimated that during the period  $2005\ 2024$ , these installations have saved emissions of around  $468\ 000\ t\ CO_2$ .

At EuroAirport Basel-Mulhouse-Freiburg projects are currently underway to replace diesel-powered GPUs with battery-powered GPUs. In addition, the French Civil Aviation is preparing regulations to restrict the operating time for APU operation and the roll phase with engines running on arrival.

 $<sup>^{235}</sup>$  EuroAirport Basel-Mulhouse-Freiburg: Roadmap zur Reduzierung der CO  $_{2}$ -Emissionen

#### 7.6.3 Conversion of GSE to cleaner fuels

Geneva Airport has enforced a set of regulations to prevent the use of too old ground support vehicles (gradual phase-out of vehicles and engines older than 20 years (2019), respectively 15 years (2023)). New vehicles should follow the latest EU engine regulation. Since 2019, only electric light vehicles are authorized for new vehicle entering the apron. The use of electric/gas vehicles is encouraged and subsidized. More than 150 electric charging points have been installed on the apron. In 2024, 35 % of the vehicles in operation on the tarmac are electric, hybrid or gas vehicles, of which 31 % are pure electric. Geneva Airport has set the goal to reach 90% electric vehicles and GSE in 2030. Non fossil fuel is partially introduced for the thermal engine GSE (currently, diesel B7).

Zurich airport has both installed various new electric charging stations airside for the benefit of its own vehicle fleet but also the GSE of partners. At the same time, the airport operator vehicle fleet is continuously being electrified. Additionally, fossil free liquid fuel has been introduced. This measure saves about 80t of CO<sub>2</sub> emissions per year for the airport operator fleet only.

EuroAirport Basel-Mulhouse-Freiburg owns a fleet of approximately 100 vehicles of all types. Today, slightly more than 10% are electric vehicles, and approximately 50% are natural gas-powered vehicles. The airport aims to gradual replace the vehicle fleet and other equipment with vehicles powered by renewable energies until 2030.

#### 7.6.4 Improved transportation to and from airport

Zurich airport has constantly improved public transportation access to the airport while at the same time managing all vehicle parking lots at the airport. As of now, approximately 46% of all airport users (passengers, staff, visitors) are using public transportation. Electrified bus route has been introduced. This measure leads to an estimated CO<sub>2</sub> reduction of 250 t per year.

Geneva Airport manages an ambitious mobility plan both for the airport's employees and for the passengers, with the goal of reaching 45% of sustainable mobility for both categories. This goal is already reached for the passengers. For the employees, there are incentive measures for the use of public or active transportation. There also are restrictive measures for car parks. Currently, 39 % of employees are using sustainable mobility for commuting. In addition, high level lobbying is pursued to get improvements of the airport public transportation network to and from the airport.

EuroAirport Basel-Mulhouse-Freiburg outlines several measures to improve transportation to and from the airport in its roadmap for reducing CO<sub>2</sub> emissions. These include a cross-company mobility plan, a rail connection, an electric bus service, a sustainable parking strategy, and the installation of charging stations for electric vehicles<sup>236</sup>.

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<sup>&</sup>lt;sup>236</sup> EuroAirport Basel-Mulhouse-Freiburg: Roadmap zur Reduzierung der CO<sub>2</sub>-Emissionen

## **VIIIConclusion**

Switzerland is fully committed to and involved in the fight against climate change, and works towards a resource-efficient, competitive and sustainable multimodal transport system.

Swiss civil aviation has a high safety standard and at the same time pursues a sustainable development strategy.

The State Action Plan provides an overview of past and future actions by Switzerland to reduce the CO<sub>2</sub> emissions of its civil aviation sector on a supranational as well as on a national level.

On the national level FOCA evaluated possible measures to reduce CO<sub>2</sub> emissions in collaboration with stakeholders of aerodromes, air traffic control and aviation industry. Most of those measures are done on a voluntary base and are mostly also targeted at optimising operations and business. The quantification of these measures is only possible with limitations. Nonetheless the results show the willingness and effort of the civil aviation sector to reduce CO<sub>2</sub> emissions.

Switzerland shares the view that environmental concerns represent a potential constraint on the future development of the international aviation sector and fully support ICAO's ongoing efforts to address the full range of these concerns, including the key strategic challenge posed by climate change, for the sustainable development of international air transport.

This State Action Plan was finalised in June 2025 and shall be considered as subject to updating after that date.

# IX Appendix

## A Detailed Results for ECAC Scenarios from Section 5.2

#### 1. BASELINE SCENARIO

## a) Baseline forecast for international traffic departing from ECAC airports

Year	Passenger Traffic (IFR movements) (million)	Revenue Pas- senger Kilome- tres <sup>237</sup> RPK (billion)	All-Cargo Traffic (IFR movements) (million)	Freight Tonne Kilometres trans- ported <sup>238</sup> FTKT (billion)	Total Revenue Tonne Kilome- tres <sup>239</sup> RTK (billion)
2010	4.71	1'140	0.198	41.6	155.6
2019	5.88	1'874	0.223	46.9	234.3
2023	5.38	1'793	0.234	49.2	228.5
2030	6.69	2'176	0.262	55.9	273.5
2040	7.69	2'588	0.306	69.0	327.8
2050	8.46	2'928	0.367	86.7	379.5

Note that the traffic scenario shown in the table is assumed for both the baseline and implemented measures scenarios

#### b) Fuel burn and CO2 emissions forecast for the baseline scenario

Year	Fuel Consump- tion (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	0.0327	0.327
2019	53.30	168.42	0.0280	0.280
2023	48.41	152.96	0.0268	0.268
2030	54.46	172.10	0.0250	0.250
2040	62.19	196.52	0.0240	0.240
2050	69.79	220.54	0.0238	0.238

For reasons of data availability, results shown in this table do not include cargo/freight traffic.

 $<sup>^{237}</sup>$  Calculated on the basis of Great Circle Distance (GCD) between the airports of the available passenger reports (subset of the global traffic; from 97% in 2010 up to 99% for the forecast years).

 $<sup>^{\</sup>rm 238}$  Includes passenger and freight transport (on all-cargo and passenger flights).

<sup>&</sup>lt;sup>239</sup> A value of 100 kg has been used as the average mass of a passenger incl. baggage (ref: ICAO).

c) Average annual fuel efficiency improvement for the Baseline scenario

Year	Fuel Consumption (10 <sup>9</sup> kg)
2010-2023	-1.50%
2023-2030	-1.01%
2030-2040	-0.40%
2040-2050	-0.08%

#### 2. IMPLEMENTED MEASURES SCENARIO

## 2A) EFFECTS OF AIRCRAFT TECHNOLOGY IMPROVEMENTS AFTER 2023

a) Fuel consumption, CO<sub>2</sub>, and CO<sub>2</sub> equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology improvements after 2023 included. The well-to-wake emissions are determined by assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn<sup>240</sup>:

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Well-to-wake CO₂e emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	147.77	0.0334	0.334
2019	53.30	168.42	206.80	0.0284	0.284
2023	48.41	152.96	187.82	0.0270	0.270
2030	53.64	169.50	208.12	0.0246	0.246
2040	56.60	178.84	219.59	0.0218	0.218
2050	54.77	173.06	212.50	0.0187	0.187
For reas	For reasons of data availability, results shown in this table do not include cargo/freight traffic.				

b) Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology only)

Period	Average annual fuel efficiency improvement (%)		
2010-2023	-1.50%		
2023-2030	-1.22%		
2030-2040	-1.19%		
2040-2050	-1.55%		

 $<sup>^{240}</sup>$  "Well-to-wake CO<sub>2</sub>e emissions of fossil-based JET fuel are calculated by assuming an emission index of 3.88 kg CO<sub>2</sub>e per kg fuel (see DIN e.V., "Methodology for calculation and declaration of energy consumption and GHG emissions of transport services (freight and passengers)", German version EN 16258:2012), which is in accordance with 89 g CO<sub>2</sub>e per MJ suggested by ICAO CAEP AFTF."

## 2B) EFFECTS OF AIRCRAFT TECHNOLOGY AND ATM IMPROVEMENTS AFTER 2019

a) Fuel consumption, CO<sub>2</sub> and CO<sub>2</sub> equivalent emissions of international passenger traffic departing from ECAC airports, with aircraft technology and ATM improvements after 2023. The well-to-wake CO<sub>2</sub> equivalent emissions are determined by assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn:

Year	Fuel Con- sumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emissions (10 <sup>9</sup> kg)	Well-to-wake CO <sub>2</sub> e emissions (10 <sup>9</sup> kg)	Fuel efficiency (kg/RPK)	Fuel efficiency (kg/RTK)
2010	38.08	120.34	148.02	0.0327	0.327
2019	53.30	168.42	207.16	0.0280	0.280
2023	48.41	152.96	188.14	0.0268	0.268
2030	52.57	166.11	204.31	0.0241	0.241
2040	53.20	168.11	206.78	0.0205	0.205
2050	49.29	155.75	191.58	0.0168	0.168

For reasons of data availability, results shown in this table do not include cargo/freight traffic.

b) Average annual fuel efficiency improvement for the Implemented Measures Scenario (new aircraft technology and ATM improvements)

Period	Average annual fuel efficiency improvement (%)		
2010-2023	-1.50%		
2023-2030	-1.51%		
2030-2040	-1.60%		
2040-2050	-1.98%		

c) Equivalent CO<sub>2</sub>e emissions forecasts for the scenarios described in this common section, assuming 3.88 Kg of CO<sub>2</sub> equivalent emissions for 1 Kg of Jet-A fuel burn:

	Well-to-wa	% improvement by		
Year	Baseline	Implemented Measu	ures Scenario	Implemented Measures (full e- scope)
	Scenario	Aircraft techn. im- provements only	Aircraft techn. and ATM improvements	
2010	143.38			NA
2019	201.80			NA
2023	187.82			NA
2030	211.32	211.32 208.12 203.95		-3%
2040	241.30	219.59	206.41	-14%
2050	270.79 212.49 191.24			-29%
			191.24  in this table do not include cargo/freig	

# 2C) EFFECTS OF AIRCRAFT TECHNOLOGY, ATM IMPROVEMENTS AND SAF AFTER 2023 ON EU27+EFTA INTERNATIONAL DEPARTURES

The Net CO2 emissions and expected benefits of SAF use are calculated where regional measures are taken (e.g. ReFuelEU Aviation) in the European scenario with measures.

a) Fuel consumption, CO<sub>2</sub>, Net CO<sub>2</sub> emissions of international passenger traffic departing from EU27+EFTA airports, with aircraft technology and ATM improvements after 2023 The tank-to-wake Net CO<sub>2</sub> emissions are based on the use of Sustainable Aviation Fuels (ReFuelEU Aviation, 70% decarbonation factor for the synthetic aviation fuels, and 65% for aviation biofuels).

Year	Fuel Consumption (10 <sup>9</sup> kg)	CO <sub>2</sub> emis- sions (10 <sup>9</sup> kg)	Tank-to-wake Net CO₂ emis- sions (10 <sup>9</sup> kg)
2010	27.84	87.97	87.97
2019	38.19	120.69	120.69
2023	34.08	107.71	107.71
2030	36.97	116.84	112.21
2040	35.63	112.60	87.15
2050	32.80	103.63	54.67

For reasons of data availability, results shown in this table do not include cargo/freight traffic.

## B List of Abbreviations

ACA - Airport Carbon Accreditation

ACARE - Advisory Council for Research and Innovation in Europe

ACARS - Aircraft Communications Addressing and Reporting System

ACC - Area Control Centres

ACI - Airports Council International

AEM - Advanced Emission Model

AFTF - Alternative Fuels Task Force (of ICAO CAEP)

AIRE - The Atlantic Interoperability Initiative to Reduce Emissions

ANS - Air Navigation Service

**APER TG** - Action Plans for Emissions Reduction Task Group of the ECAC/EU Aviation and Environment Working Group (EAEG)

ATC - Air Traffic Control

ATM - Air Traffic Management

ATT - Aircraft Assignment Tool

**BAU** - Business as Usual

**CAEP** – Committee on Aviation Environmental Protection

**CCD** – Continuous Climb Departures

CDA - Continuous Descent Approach

**CDM** - Collaborative Decision Making

**CDO** - Continuous Descent Operations

CNG - Carbon neutral growth

**CORSIA** - Carbon Offsetting and Reduction Scheme for International Aviation

**CPDLC** – Controller-Pilot Data Link Communications

**EAER** – European Aviation Environmental Report

**EASA** – European Aviation Safety Agency

**EC** – European Commission

**ECAC** – European Civil Aviation Conference

**EEA** – European Economic Area

EFTA - European Free Trade Association

**EU** – European Union

**EU ETS** – the EU Emissions Trading System

FAB - Functional Airspace Block

FANS - Future Air Navigation System

FP7 - 7th Framework Programme

GHG - Greenhouse Gas

**GMBM** - Global Market-based Measure

Green IA - Initial Approach

Green STAR - Standard Arrival

HVO - Hydro-treated Vegetable Oil

ICAO - International Civil Aviation Organisation

IFR - Instrumental Flight Rules

IPCC - Intergovernmental Panel on Climate Change

IPR - Intellectual Property Right

JTI - Joint Technology Initiative

JU - Joint Undertaking

LTAG – Long-Term Aspirational goal for international aviation

LTO cycle - Landing/Take-off Cycle

MBM - Market-based Measure

MT - Million tonnes

**OFA** - Operational Focus Area

PRISME - Pan European Repository of Information Supporting the Management of EATM

RED - Renewable Energy Directive

**RNAV** – Area Navigation

RNP AR - Required Navigation Performance Authorization Required

RNP STAR - Required Navigation Performance Standard Arrival

RPAS - Remotely Piloted Aircraft

RPK - Revenue Passenger Kilometre

RTD - Research and Innovation

RTK - Revenue Tonne Kilometre

SAF - Sustainable Aviation Fuels

SES - Single European Sky

SESAR - Single European Sky ATM Research

SESAR JU – Single European Sky ATM Research Joint Undertaking

SESAR R&D - SESAR Research and Development

SMEs - Small and Medium Enterprises

**SWAFEA** – Sustainable Ways for Alternative Fuels and Energy for Aviation

**SWIM** – System Wide Information Management

TMA - Terminal Manoeuvring Area

ToD - Top of Descent

**UNEP** – United Nations Environmental Programme