



International Civil Aviation Organization

**WORKING PAPER**

CAAF/3-WP/40  
20/10/23  
English only

## **THIRD CONFERENCE ON AVIATION AND ALTERNATIVE FUELS (CAAF/3)**

**Dubai, United Arab Emirates, 20 to 24 November 2023**

**Agenda Item 5: Reviewing the 2050 ICAO Vision for SAF, including LCAF and other cleaner energy for aviation, in order to define a global framework**

### **AIRPORTS PLAY A CRITICAL ROLE IN THE DEPLOYMENT AND UPTAKE OF SAF**

(Presented by Airports Council International (ACI))

#### **SUMMARY**

ACI has long been a leader in the aviation industry in adopting measures to reduce the carbon footprint of air travel and encourages the CAAF/3 to take a proactive approach to ensure ICAO leadership at international and State level. The aviation industry is set to resume its upward growth trajectory, but this will also lead to increased levels of scrutiny by governments and the public: this paper makes recommendations for outcomes which demonstrate that the industry is taking all steps possible to reduce the impact of aviation on the climate and that ensures that future growth can be sustainable.

Action by the Conference is in paragraph 6.

#### **1. INTRODUCTION**

1.1 In June 2021, ACI member airports agreed a Long-Term Goal of achieving Net Zero by 2050 and urged governments to provide the necessary support to achieve this goal. This was followed in October 2021 by a similar goal across the entire aviation industry through the Air Transport Action Group (ATAG) of which ACI is a Board member.

1.2 In October 2022 the 32nd ACI World Annual General Assembly applauded the adoption by States at the 41st ICAO Assembly to a Long-Term Aspirational Goal of Net Zero by 2050, and called

upon ICAO and States to work with industry to identify the impacts, and to update the regulatory framework to accommodate the integration of alternative fuel sources at airports.

1.3 And, in June 2023 the 33rd ACI World Annual General Assembly further called on ICAO and States to stimulate SAF deployment in the most efficient way, considering fuel accounting mechanisms to minimize transportation and the need to have supply at every airport, and to provide an enabling environment including policy support, sustainability criteria, monitoring of progress, financing support, and capacity building.

1.4 ACI recognizes the steps already taken by ICAO and its Member States in supporting the development, certification and deployment of SAF and joined the ACT-SAF program in February 2023.

1.5 ACI welcomes the considerable work already undertaken by ICAO as presented in the Submission “Possible CAAF/3 outcomes for consideration by pre-CAAF/3 consultation”. It particularly welcomes the recognition that ICAO had “*heard the industry calls to help reduce risk and attract investment by providing greater regulatory certainty ... and better access to financing, by establishing better collaboration and coordination between all stakeholders.*” Furthermore, ACI welcomes the positive tone of the discussions at the pre-CAAF Outcomes Consultation held on 25 and 26 September.

## 2. POLICY AND PLANNING

2.1 The eyes of the world will be on Dubai at this Conference and COP28. ICAO must demonstrate continued leadership for climate action for the international civil aviation industry. The Vision, indicated as “x” in the Building Blocks, must be quantified and be ambitious to ensure credibility. This provides a focus for the global ambition, and is qualified by recognizing that not all States will be able to move at the same speed. ACI recognizes the linkage between elements in Block 1 and Block 4 (financing).

2.2 In its submission to the pre-CAAF Outcomes Consultation, the International Coordinating Council of Aerospace Industry Associations (ICCAIA) had suggested that current projects launched or announced were expected to bring global production of SAF to 20 – 25 million tonnes by 2030 which could in itself mean a reduction of emissions of CO<sub>2</sub> by 5%. This was and is considered by ACI as a necessary starting point for setting a meaningful Vision, which might be further increased to help stimulate new investment in additional facilities in the timeframe. ICCAIA had also suggested further milestones for 2035 and 2040 which ACI would also support.

2.3 This Block also recognizes that reaching the Vision is a collaborative effort with action required from all stakeholders and suggests some actions that airports might take. Airports are already taking action in a number of ways, most importantly by engaging with fuel suppliers, airlines, and local and national regulators. Accommodation of up to 50% blend drop-in fuels will need very little by way of changes to infrastructure, but there will need to be essential changes to accommodate the longer-term supply of 100% SAF. The “*as appropriate, including*” qualifier is important here.

2.4 States will also need to ensure that there are similarly no regulatory, commercial or technical impediments to new producers supplying and blending SAF with traditional fuel currently supplied by incumbent / legacy producers.

2.5 Airports support airlines' and other aircraft operators' transition from conventional fossil fuels to SAF and other alternative fuels, and are committed to collaborating with them on this journey.

### 3. REGULATORY FRAMEWORK

3.1 ACI recognizes the value to all States of establishing clear fuel accounting rules. These should be on a non-discriminatory basis and be neutral in fiscal impact as between SAF producers and users – many airports are unlikely to have access to physical SAF without excessive transport or distribution costs but would nonetheless wish to be able to provide SAF accredited fuel to their users. In particular, airports wish to avoid aircraft operators being required to tanker SAF. This may be particularly important where States have introduced mandates.

3.2 A chain of custody concept (e.g., “book and claim”) should be developed in a way that allows all participants to benefit, and which avoids unintended consequences – ACI is ready to participate in such discussions from an airport perspective.

### 4. IMPLEMENTATION SUPPORT

4.1 As previously mentioned ACI joined the ICAO ACT-SAF program in February, but indeed has been supporting its airport members in decarbonisation for many years, not least with the Airport Carbon Accreditation program. At the higher levels of certification, the program requires airports to measure and report Scope 3 emissions, to include these in a roadmap aligned with the net zero 2050 goal, and to engage with their operational stakeholders to foster reductions in those emissions.

4.2 ACI recognizes that availability of feedstock will vary by location and region and fully supports measures which aid the development and acceleration of feedstock production. It also supports actions by States to develop their own manufacturing capability, again to ensure that SAF is available locally for those airports that wish to enable its supply.

4.3 ACI supports its members across all regions in implementation of safety, security, and environmental protection through its Airport Excellence (APEX) programs, training courses, and publications (many in collaboration with ICAO) and will continue to assist in global SAF deployment – we need to ensure that no airport is left behind.

### 5. FINANCING

5.1 Airports operate under a wide variety of business models and regulatory regimes, and these will have an impact on the degree of engagement each can have with respect to financing. Nonetheless, many play an important role in the shaping of national policy, and all have a shared interest in reducing the environmental impact of aviation. In this respect they can provide support as facilitators in the discussions between all relevant parties. The most successful SAF programs to date, such as those in San Francisco and Heathrow have occurred because of the initiative and direct engagement of the airport with fuel suppliers, airlines and governments.

5.2 ACI welcomes the recognition in the ICAO submission that “*some financing instruments require cooperation and collaboration between stakeholders, including States, industry and public and*

*private financial institutions to mitigate the investment risk”* and airports will play their full part in engaging in this cross-stakeholder collaboration. The aviation industry, including airports, will also require financial support at national and international level from institutional stakeholders.

## 6. ACTION BY THE CAAF/3

6.1 ACI would like to emphasize its commitment to the ICAO process and the adoption of the LTAG at the last Assembly. Progress must now be made in implementing LTAG, and ACI therefore supports and calls for measures to deliver that goal and the Vision.

6.2 The CAAF/3 is invited to:

- a) adopt an ambitious quantified goal for 2030 – a 5% reduction in carbon intensity goal should be considered a necessary starting point;
- b) agree to the development of a fuel accounting mechanism that would allow all States to participate both in the production and use of SAF on a non-discriminatory basis – ICAO should establish the global principles, but not manage it directly;
- c) adopt a clear regulatory framework that helps de-risk the SAF sector for investors and the finance community, and at the same time provides the necessary support to developed and developing countries;
- d) ensure that there is recognition of the need for adequate public funding to support advanced technologies and infrastructure that enable expanded SAF production and distribution capacity, development of fuel-efficient aircraft, and more efficient operations; and
- e) provide for a review mechanism before 2030, possibly a CAAF/4, to assess progress and consider further measures to reach ICAO’s Long-Term Aspirational Goal.

— END —