

ERA's feedback on the Roadmap on ReFuelEU Aviation, Sustainable Aviation Fuels (Roadmap)

About ERA:

ERA (European Regions Airline Association) is the trade association representing more than 50 airlines and 150 associate members, including manufacturers, airports, suppliers and aviation service providers, across the entire spectrum of the aviation industry. The power of one collective voice, representing multiple businesses, to promote and protect one industry sector is incredibly strong.

ERA works on behalf of its members to represent their interests before Europe's major regulatory bodies, governments and legislators to encourage and develop long-term and sustainable growth for the sector and industry. The association also brings members together to exchange information and learn from each other through events, groups, meetings and forums. A major part of ERA's role is to raise the profile and importance of its members, to champion green and sustainable air connectivity and European air transport.

Feedback:

ERA welcomes this opportunity to provide input to the inception impact assessment on the ReFuelEU Aviation initiative and fully supports its purposes: to reduce the environmental footprint of the aviation sector and to boost the supply and demand for sustainable aviation fuels.

The aviation sector has been relying on different solutions to reduce its emissions, such as market-based measures, technology development and operational improvements. However, these represent solutions for the long-term. Sustainable aviation fuels therefore also play a crucial role in the mitigation of aviation CO₂ emissions as they offer a short-term solution using existing aircraft. It is in fact expected that SAF would reduce CO₂ emissions by 80% with the current fleet.

However, there are still significant challenges such as low production rates and competition with other transport modes (current SAF production only covers 0.1% of total fuel use by the aviation industry) and very high prices (currently between two to six times higher than conventional jet fuel). The higher costs do not represent a viable alternative to conventional jet fuel and the market uncertainty does not incentivise the investments necessary to increase SAF production. ERA therefore supports the Commission's efforts to identify adequate measures for the industry in order to increase the investments, supply and the uptake of sustainable aviation fuels in Europe.

When it comes to the SAF blending mandate, ERA supports a gradual, minimum productions levels of SAF to be supplied to airlines. In addition, this initiative should to be designed for and considered within the frameworks of the EU Energy Taxation Directive and the of the EU Emissions Trading System when they will be revised.

Finally, given the current circumstances, it is important to recognise the considerable uncertainty that the Covid-19 crisis is causing for the aviation industry.

ERA is looking forward to further contribute to the legislative proposal of the ReFuel EU Aviation initiative.

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