era
european regions airline association

Cutting emissions without cutting connections

How to make ReFuelEU work for all of Europe's airlines

Cutting emissions without cutting connections

Executive summary

Aviation worldwide faces the challenge of cutting emissions while preserving global connectivity. In Europe, aviation is more than transport: it is essential infrastructure. It connects citizens to essential services, keeps regional economies alive, supports tourism and trade, and binds together islands, remote regions, and cross-border areas where no alternatives exist. For many communities, regional air services are not a luxury, they are a lifeline.

In line with Europe's climate goals, the aviation sector has committed to achieving net-zero CO_2 emissions by 2050 through its Destination 2050 roadmap. Sustainable aviation fuel (SAF) is expected to deliver the largest share of these reductions. The EU's flagship policy to scale up SAF is the ReFuelEU Aviation Regulation, which requires fuel suppliers to blend increasing shares of SAF, starting at 2% in 2025 and rising to 70% by 2050.

However, while ReFuelEU provides a clear path to decarbonisation on paper, its practical implementation is already creating significant barriers that threaten its success. These flaws are creating a fragmented rollout that distorts the market and disadvantages smaller operators. The key issues include:

- Unfair access: SAF supply is heavily concentrated at major hubs, leaving regional airports underserved.
- Cost distortions: opaque surcharges and bundling pricing are driving up costs for many airlines.
- Compliance traps: fragmented and burdensome reporting requirements are hitting smaller carriers hardest.

Operational risks: The regulation's Article 5 or so-called ''anti-tankering rule' designed to prevent airlines from carrying excess fuel to avoid refuelling with SAF, is having unintended safety and cost impacts on lifeline routes.

If left unaddressed, these flaws will lead to fewer routes, reduced regional connectivity, and a higher risk of bankruptcy for the very airlines that serve Europe's remote communities. Ultimately, this misallocation of scarce SAF will weaken climate action, undermining the regulation's core objective. Evidence from the early implementation phase already shows some airports left with no SAF supply and regional airlines burdened with costs and compliance they cannot absorb.

To prevent this, the European Regions Airline Association (ERA) urges a politically prioritised revision of the ReFuelEU Regulation. The objective is simple: fix the flaws now so that SAF can be scaled up fairly and efficiently across the entire continent. A revised regulation will not only accelerate SAF uptake but also strengthen competition by creating a level playing field, deliver real emissions cuts, and protect Europe's vital regional air links.

Key recommendations

To ensure ReFuelEU delivers on its climate goals without damaging regional connectivity, ERA urges policymakers to:

1. **As a matter of urgency, give political priority to revising ReFuelEU to correct these foundational flaws before they become permanent.**

2. **Level the playing field by aligning SAF flexibility rules in ReFuelEU with those in the EU Emissions Trading System (ETS).**

3. **Stop unfair pricing through stronger regulatory oversight of SAF surcharges and bundled deals.**

4. **Adopt a 'Book & Claim' system as an interim mechanism, so every tonne of SAF purchased can be counted toward an airline's mandate, regardless of where it is physically supplied.**

5. **Fix the anti-tankering rule (Article 5) so it targets genuine tankering risks without penalising lifeline routes.**

6. **Simplify compliance by establishing a single, EU-wide reporting platform and standardised documentation.**

With these urgent adjustments, the regulation can achieve its intended purpose: accelerating SAF production, cutting aviation emissions, and keeping all of Europe connected. Delay will only result in fewer connections, fewer airlines, and weaker climate progress.

Contents

1 Flying towards net zero: Why SAF matters

Aviation is a cornerstone of Europe's economic resilience, social inclusion and territorial cohesion. It enables fast, reliable connections across a continent defined by geographical, cultural and economic diversity – not only between capitals and major cities, but also across islands, remote regions and cross-border areas where alternatives are often limited or non-existent.

Regional airlines, in particular, play a vital and irreplaceable role in sustaining these links. They ensure access to essential services, support regional economies, facilitate tourism and trade, and uphold the basic right to mobility. These carriers do not drive growth through volume and low fares, but by maintaining the critical infrastructure of connectivity that binds Europe's regions together. Far from being a luxury, regional air services are a lifeline.

At the same time, climate change is an urgent global crisis, and all sectors – including aviation – must play their part in reducing greenhouse gas emissions and ERA member airlines fully recognise this responsibility. Through the Destination 2050 roadmap, Europe's key aviation stakeholders, including airlines, airports, manufacturers and air navigation providers, have jointly committed to achieving net-zero CO_2 emissions by 2050, setting out a credible, science-based trajectory aligned with the EU's broader climate goals.

The challenge, then, is not whether aviation must decarbonise – it must – but how to do so without sacrificing connectivity, especially for more remote and underserved regions. That's why a credible, sector-specific pathway to net zero is essential but also why regional aviation must be part of both the problem-solving and the policy design.

Destination 2050 rests on four interconnected pillars:

1. **Aircraft and engine technology** – supporting the development and entry into service of more efficient, next-generation aircraft.
2. **Renewable energy** – including sustainable aviation fuels (SAF) and, in the longer term, hydrogen-powered aviation.
3. **Optimised air traffic management and aircraft operations** – reducing fuel burn through better routing, airspace use and efficiency.
4. **Out-of-sector measures** – such as emissions trading and carbon removals to address residual emissions.

Although each pillar plays a role, SAF accounts for the largest share of emissions reductions by 2050, with an estimated 35% of total reductions. As a drop-in fuel, SAF can be blended with conventional jet fuel and used in existing aircraft and refuelling infrastructure without modification. However, production volumes remain limited, and costs are still significantly higher than conventional fuel – a gap that mandates like ReFuelEU Aviation are intended to close over time.

Simultaneously, the industry is investing in next-generation propulsion systems. Many ERA members are actively engaged in the development and future deployment of zero-emission aircraft, including electric and hydrogen-powered models, as well as in advancing the capability to operate with 100% SAF. These technologies hold particular promise for regional aviation, where their performance profiles match real-world operations.

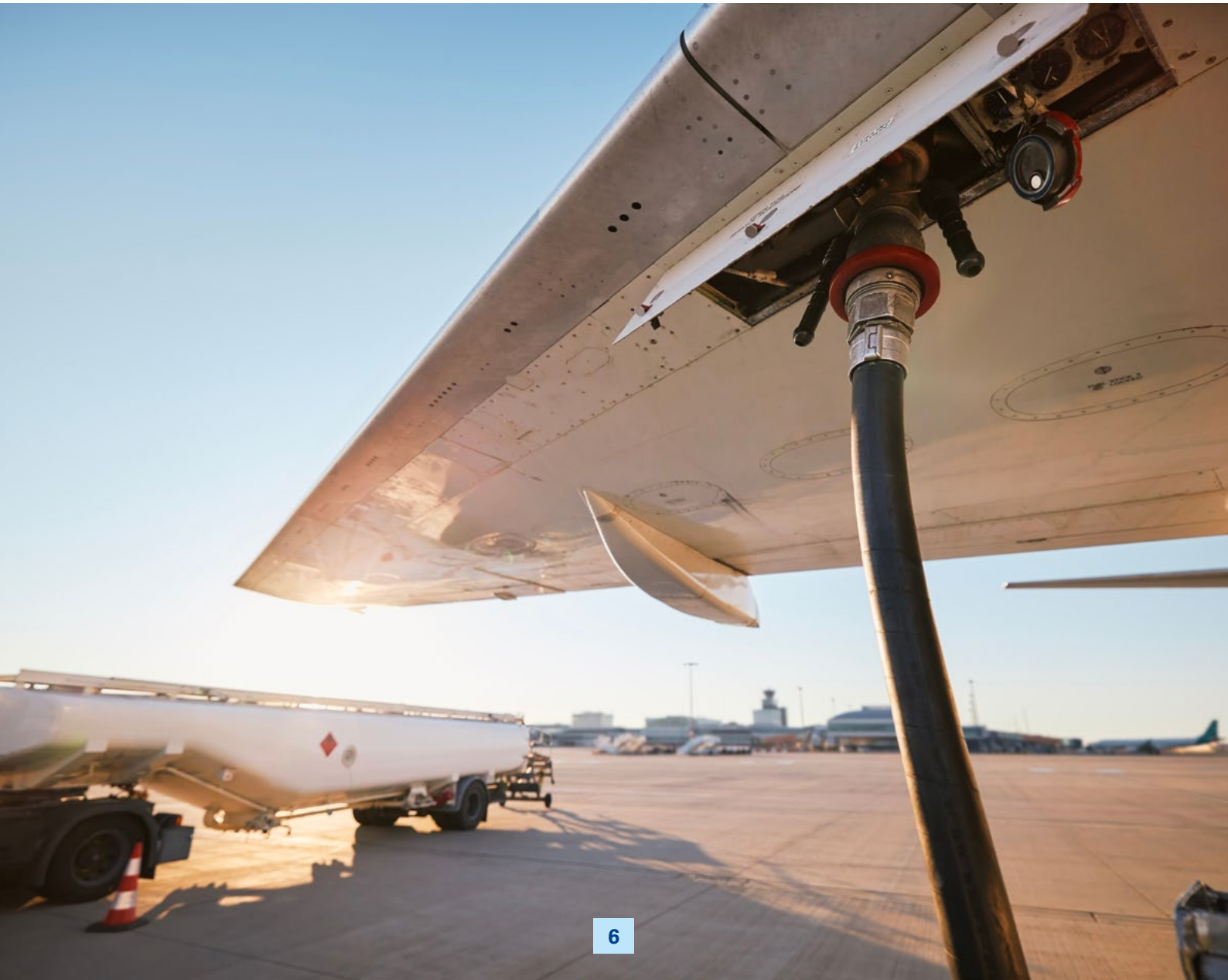
Electric aircraft in development today typically offer ranges of up to 200 nautical miles, with hybrid-electric extending this to around 500 nautical miles. Hydrogen-powered designs are expected to cover even greater distances, delivering substantial emissions reductions on short- to medium-haul routes. ERA strongly supports the timely introduction of these solutions, ensuring that regional carriers can act as testbeds and early adopters.

Still, even under the most optimistic assumptions, the majority of commercial flights in Europe will continue to rely on liquid fuels in the short term. **This is why SAF is essential. It bridges the emissions gap between today's fleet and tomorrow's technologies – and it does so without compromising connectivity.**

Europe's SAF strategy, anchored in the ReFuelEU Aviation Regulation, reflects this reality. Starting with a 2% mandate in 2025 and ramping up to 70% by 2050, the regulation aims to stimulate demand, build investor confidence, and scale up production across the continent.

But ambition must be matched by implementation that works across all segments of aviation. Today, SAF supply is concentrated at a limited number of major hubs – yet the continent's air transport network is far more diverse. While regional airlines are particularly exposed – operating shorter routes, serving smaller airports, and working within tight margins – the wider risk is structural: a fragmented SAF rollout that distorts the market, disadvantages many operators, and ultimately undermines the regulation's core objective.

In short: SAF is the cornerstone of net-zero aviation, but only if it is made accessible, affordable, and fairly implemented across Europe's aviation ecosystem.



2 The EU's SAF response: Ambitious, but uneven

Europe has positioned itself as a global leader in sustainable aviation policy. Through a combination of regulatory and market-based instruments, the EU is steering the sector toward net-zero emissions. Two of the most important tools in this approach are the EU Emissions Trading System (EU ETS) and the ReFuelEU Aviation Regulation.

The EU ETS, in force for intra-European aviation since 2012, imposes a carbon price on emissions from flights within the European Economic Area. Airlines can reduce their ETS exposure by using eligible SAF, but only if they provide detailed, airport-specific documentation of SAF uplift, in line with stringent monitoring and verification rules. These requirements are technically demanding and resource-intensive – a compliance burden that falls disproportionately on regional carriers, which often lack the dedicated resources or economies of scale to manage it efficiently.

The ReFuelEU Aviation Regulation, adopted in 2023 and taking effect progressively from 1 January 2024 with key specific articles from 1 January 2025, complements the ETS with a binding supply-side approach. It requires fuel suppliers at EU airports to provide a minimum share of SAF – starting at 2% in 2025 and rising to 70% by 2050, including a dedicated sub-target for synthetic fuels from 2030. The regulation also introduces aircraft refuelling obligations, SAF access requirements for airports, and a voluntary environmental labelling scheme for flights.

On paper, these two frameworks are designed to work in tandem: one incentivising emissions reductions through pricing, the other scaling up supply through mandates. In practice, however, the link between them remains weak, and implementation is uneven.

SAF production in Europe is still ramping up, and while capacity is expected to grow, current supply remains limited and unevenly distributed. Most SAF is delivered to a handful of major hub airports, where infrastructure and economies of scale make blending and distribution feasible. Elsewhere, especially at smaller and regional airports, SAF access is either severely constrained or entirely unavailable – leaving regional operators unable to source SAF or benefit from associated ETS reductions.

The consequences are structural. **Airlines operating from smaller or less well-served airports face higher fuel costs, limited access to SAF, and greater administrative complexity – all while being held to the same regulatory standards.** This asymmetry risks distorting the market, broadening existing inequalities, and placing disproportionate pressure on regional airlines that provide essential connectivity on thin commercial margins.

3 From a clear runway to a maze: The reality of ReFuelEU Aviation

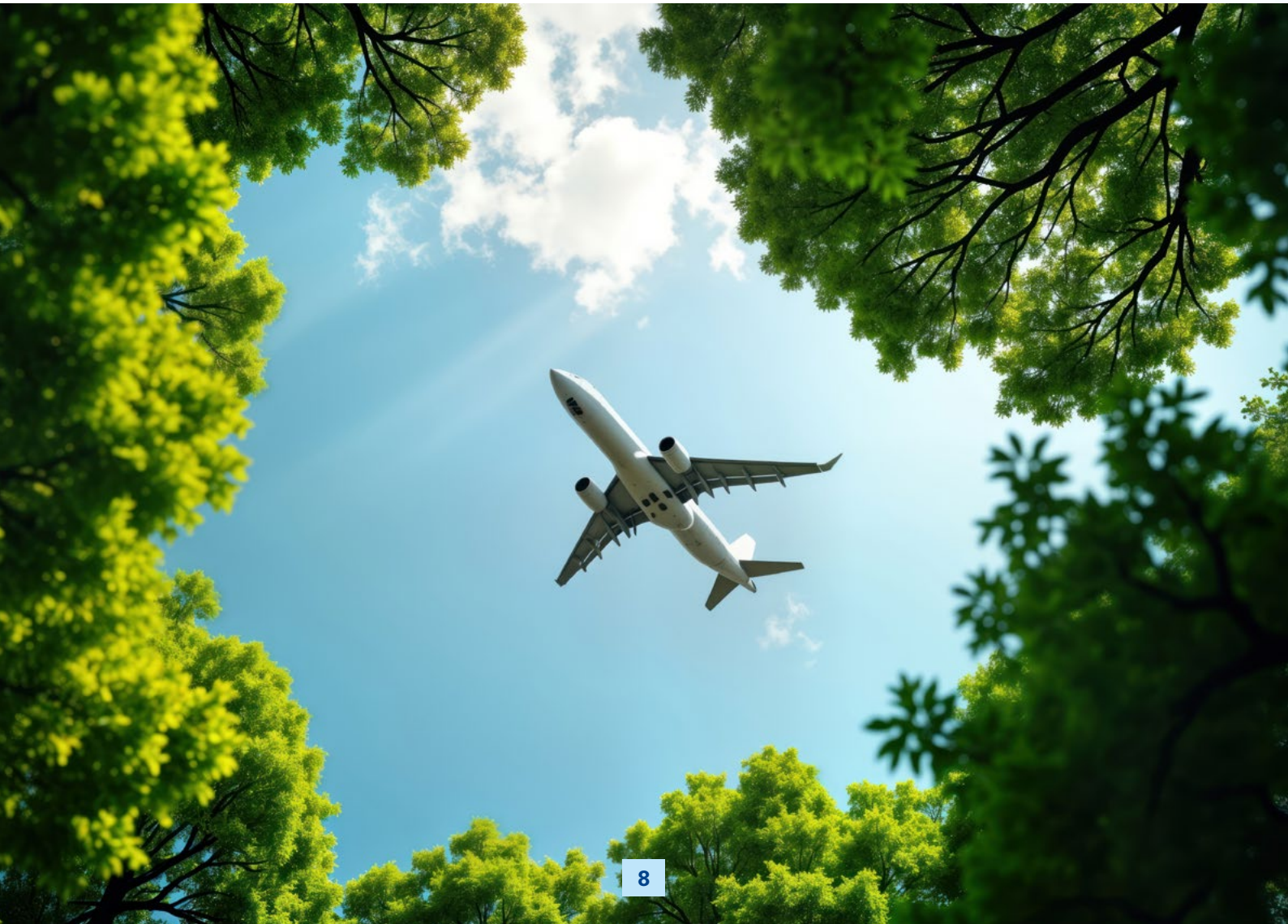
ReFuelEU Aviation was meant to give Europe's aviation sector a clear runway towards decarbonisation – a pragmatic way to scale up SAF use without stalling before take-off. For some, that path is indeed straightforward. For many airlines, however, the same regulation feels less like a runway and more like a maze with obstacles.

This is not about unwillingness to comply. ERA's members are committed to achieving net-zero by 2050, and to using SAF wherever it is available. The problem lies in the way certain provisions interact on the ground, creating bottlenecks, unnecessary costs, and in some cases, safety concerns.

To understand the real-world impact, ERA surveyed its airline members across Europe. The feedback was consistent and clear:

Although the mandate on paper did not seem to be the problem, the way it is being implemented is.

What follows is a summary of the main challenges identified through the survey and further member discussions.



3.1 Asymmetric flexibility: Leeway for suppliers, roadblocks for airlines

When designing ReFuelEU Aviation, policymakers recognised that in the early years, SAF production would be limited and unevenly distributed. To avoid bottlenecks, they introduced a flexibility mechanism allowing fuel suppliers to meet their national blending target by averaging SAF deliveries across all airports in a Member State.

For suppliers, this is a smooth, efficient runway – they can focus deliveries where it's logistically easiest, usually at large hubs. For airlines, the runway changes entirely. Under the EU ETS, emissions credits can only be claimed for SAF physically uplifted at a specific airport, backed by detailed documentation. The supplier's freedom to average across airports does not carry over to airlines.

The outcome: airlines operating from airports without SAF, including key regional nodes, pay higher fuel prices without being able to offset ETS costs. **The mechanism meant to help suppliers scale up has inadvertently penalised the airline, with regional carriers hit hardest.**

To be clear: this is an unintended design flaw, not a deliberate feature. There is no policy rationale for fuel suppliers being able to average SAF supply across airports in a country while airlines – the very customers taking that SAF – cannot apply the same flexibility to claim EU ETS credits. This is simply an unintended mismatch between the flexibility provisions in ReFuelEU Aviation and EU-ETS.

> While the SAF flexibility mechanism enables fuel suppliers to concentrate deliveries at major hubs, airlines are only entitled to claim EU ETS credits for the SAF physically uplifted at the departure airport. This creates a structural imbalance, as carriers operating from smaller airports without SAF availability are unable to benefit from the associated compliance incentives. It is frustrating that, despite significant financial investment and strict compliance efforts, airlines are unable to fully obtain the benefits due to the inconsistency between regulations both issued by the EU.
>
> **Mário Lobato de Faria, Managing Director, TAP**

Recommendation

Align the flexibility provisions in ReFuelEU Aviation and the EU ETS so airlines can claim the ETS benefit for SAF use regardless of where it is uplifted, provided national blending targets are met, and ensure automatic recognition of that compliance across both systems.

3.2 Market power and pricing: Mandate costs without mandate transparency

While the ReFuelEU Aviation mandate was placed on fuel suppliers, it is airlines that ultimately pay the bill – and in too many cases, they are paying it without clarity on what they are actually buying. Across Europe, particularly at the many airports with limited competition between fuel providers, airlines are reporting a growing list of cost and contract distortions directly linked to the SAF obligation.

One of the most common complaints is the appearance of unexplained 'SAF mandate' surcharges. In theory, these should reflect the real additional cost of blending SAF into the fuel supply. **In practice, many carriers are seeing charges that are far in excess of the SAF price in the market. In other cases, airlines are facing surcharges for SAF, applied even when no SAF is uplifted.** This means airlines are footing the bill for SAF they have not actually received – and in those cases, they also lose the EU ETS credit that should come with its verified use.

At some larger airports, another pattern is emerging: fuel bundling. Here, jet fuel and SAF are sold together as a single, non-negotiable product. This practice removes the ability – particularly for regional carriers – to competitively tender their fuel supply or to choose whether, when, and how much SAF to purchase. For some, the choice is stark: accept the bundled offer on the supplier's terms or forgo uplift entirely and lose access to both fuel and compliance credits.

There are also examples of mandated SAF being priced higher than voluntary SAF – justified by suppliers as covering 'risk'– as well as supplemental charges for very small uplifts. The latter is a frequent problem for regional airlines, whose shorter routes mean lower fuel volumes at each stop. In some cases, suppliers have even passed on their own administrative costs, further inflating the bill for compliance.

> The current structure shifts the financial burden of the SAF mandate onto airlines, even though the obligation rests with fuel suppliers. At airports with limited supplier competition, airlines face higher costs due to limited marked, high pricing practices, and surcharges on small volumes. These dynamics hit regional carriers hardest, as their lower fuel demand reduces bargaining power and increases per-unit costs. Moreover, because airlines may pay for SAF without being able to claim credits or reputational benefits, the system risks distorting competition and weakening incentives for broader SAF uptake.
>
> **Tomas Valiukevičius, Ground Ops Manager, DAT**

What all these practices have in common is a lack of meaningful oversight. The mandate itself is clear; the way costs are applied to airlines is not. **Without stronger market monitoring and enforcement, including action against unjustified pricing and anti-competitive practices, the SAF obligation risks becoming a revenue stream for suppliers rather than a shared investment in aviation's decarbonisation.**

Recommendation

Recommendation: Introduce stronger market oversight and transparency requirements so that SAF mandate costs reflect actual SAF uplift and are not inflated through opaque pricing or bundling practices. Airlines should have the right to receive the documentation required to claim EU ETS credits and to tender fuel independently where possible.

3.3 Anti-tankering: A rule at odds with safety, cost, and compliance

When ReFuelEU Aviation was adopted, policymakers wanted to prevent a loophole: airlines fuelling up outside the EU to avoid buying fuel subject to the Union's SAF blending obligations. The solution was Article 5, or the so called economic 'anti-tankering rule' – on paper, a safeguard for the mandate, in practice, a source of operational and financial turbulence, especially for regional carriers.

Under the rule, airlines must, on average over a reporting year, uplift at least 90% of the fuel needed for each departing flight at any applicable Union airport of departure. This means a maximum tolerance of 10% above the planned sector fuel, unless operationally justified. The intent is clear: stop carriers from fuelling excessively at non-Union airports to sidestep the EU's SAF requirement.

However, translating that intent into day-to-day operations has created multiple unintended consequences:

> The anti-tankering provision negatively impacts very short routes, routes with low frequencies as well as positioning/ferry flights for wet leased operations when the aircraft originates from a destination not operated by the leasing airline. Furthermore, the fact that additional fuel for safety has to be justified with supporting documentation could impinge on the Commander's discretion. The Commander's discretion should never be equated with economic tankering.
>
> **Nadia Giordimaina, Director Regulatory & International Affairs, KM**

Over-broad scope

The ostensible intention of the Article 5 was to prevent airlines from buying extra fuel at non-EU airports. However, the scope of the anti-tankering rule as currently written is far broader: rather than being limited to flights to non-EU airports (the flights of concern), it covers all flights from Union airports, including domestic and intra-EU flights where there is no possibility of avoiding the SAF blending obligations. **The rule thus imposes on airlines an operational and administrative burden which is completely disproportionate to its stated purpose.**

Safety concerns

Flight safety is paramount. Captains must retain full discretion to carry extra fuel if conditions warrant it – for weather, diversions, delays or air traffic control (ATC) rerouting. Under the current rule, if a shortcut or shorter routing unexpectedly reduces fuel burn mid-flight, crews risk breaching the 10% threshold and triggering penalties. Pilots are now expressing concern about 'landing with too much fuel', which is perverse, since safety culture encourages precisely the opposite behaviour: making sure that the flight carries an adequate amount of fuel to cover eventualities.

Financial and operational inefficiencies

For many multi-stop regional routes, such as short inter-island flights, the Article 5 forces carriers to refuel at every stop, even when only a small amount is required. Small fuel uplifts are often priced disproportionately high, involve extra ground handling activity, and can lead to departure delays, adding unpredictability to an already stretched air traffic management (ATM) network.

While Article 5 aims to reduce excessive fuel consumption and emissions from fuel tankering practices, its impact on regional aircraft operating short sectors is minimal compared to longer routes flown by turbofans. However, the additional costs, delays and operational complexity for regional carriers are far from negligible.

To illustrate this, consider the ATR – a common turboprop used in regional operations. As shown in Figure 1, for the average route length of 300km typically flown by ATRs in Europe, the extra fuel burned due to 'round trip' tankering is just 3kg.

ATR turboprops are designed for short-haul operations where tankering has marginal environmental impact. The one-size-fits-all approach of the new anti-tankering rules is detrimental to the competitiveness of regional operators, adding complexity and increasing costs. Ultimately, such rules risk threatening the essential air links that keep Europe's remote and underserved regions connected.

Nathalie Tarnaud Laude, CEO, ATR

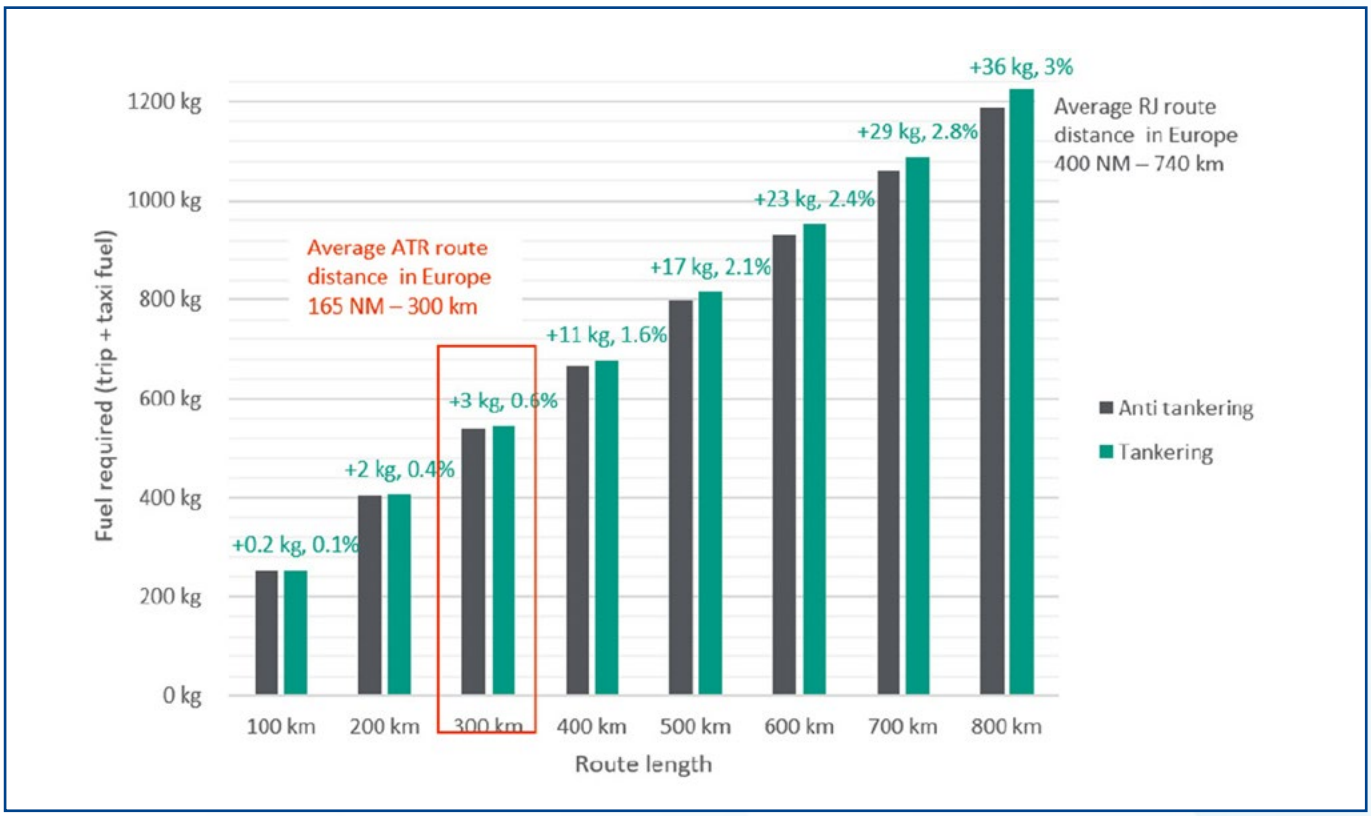


Figure 1. Fuel required vs route length ATR

Uneven exemptions and administrative burden

Exemptions from Article 5 are granted by national authorities, but the process is neither simple nor harmonised. ERA Airlines have encountered inconsistencies in how authorities assess and approve requests: some operators, despite submitting comprehensive data and clear operational justifications, have had applications denied, while others with less robust submissions for similar circumstances have had theirs approved. Some indications suggest exemptions might, on occasion, be linked to fees.

Demonstrating compliance – whether for routine operations or in support of an exemption – means collecting and storing detailed evidence for each flight, including NOTAMs (Notice to Airmen), weather reports and operational notes. This is a time-consuming process that diverts operational and ground staff from core duties, with the burden falling heaviest on smaller regional carriers.

> The 90/10 anti-tankering rule was well-intentioned but risks undermining operational safety and efficiency for regional airlines. Short-haul operations often require flexibility, yet exemptions are inconsistent and administratively heavy. The result is higher costs and unnecessary complexity for carriers already under pressure, with no tangible environmental benefit.
>
> **Gilles Feith, CEO, Luxair**

Penalising ACMI operations

ACMI (Aircraft, Crew, Maintenance and Insurance) operations are a vital tool for maintaining schedules when unexpected events ground an aircraft. Yet the 90/10 requirement applies even if the lessor aircraft arrives with fuel levels outside the lessee airline's control. **This penalises airlines for situations where they have no operational say.**

Recommendation

- **Exempt short and ultra-short sectors:** Remove short intra-EU flights – especially very short sectors (e.g., inter-island) – from the rule, as compliance costs outweigh any environmental benefit.
- **Consider limiting the scope to genuine-risk routes:** Consideration could be given to applying anti-tankering provisions only where there is a realistic risk of avoiding the EU SAF blending obligation by fuelling outside the EU.
- **Recognise operational justifications consistently:** State at EU level that legitimate operational factors (weather, ATC rerouting, diversion planning, safety reserves) are valid exemptions from the 90/10 threshold, with harmonised guidance across Member States.
- **Harmonise and simplify exemption processes:** Create a single EU-wide format and procedure for requesting exemptions, eliminating today's patchwork and removing fees charged merely to issue exemptions.
- **Exclude short-term wet-lease operations:** Exempt ACMI/wet-lease flights where starting fuel is outside the contracting airline's control, to avoid penalties for circumstances they can't influence.

3.4 Administrative burden: When compliance becomes the mission

For many regional airlines, the maze created by ReFuelEU Aviation is not just about where SAF is available or how it's priced; it's about proving compliance at every turn. Across all the issues, from misaligned flexibility to anti-tankering, one theme recurs: **the weight of administrative and reporting requirements is pulling resources away from core operations**, particularly for smaller carriers with less resources, and risks becoming a barrier to airlines' effective participation in the EU's decarbonisation effort.

Key challenges reported by ERA members:

- **Documentation bottlenecks:** Airlines often struggle to obtain the proof-of-compliance certificates from fuel suppliers needed to claim EU ETS credits for SAF use. Without this paperwork, even compliant SAF use delivers no financial or reputational benefit.
- **Fragmented processes:** Member States apply different templates, deadlines and evidence requirements for the same obligations. For operators serving multiple countries, this patchwork multiplies workloads.

> This particularly applies to small airlines with limited human resources. Administrative tasks are becoming too much complex, time consuming and anxiety-provoking.
>
> **Olivier de Marolles, Head of Flight and Ground Operations Postholder, APG**

> Complex SAF-related reporting requirements, inconsistent national processes, and additional charges for exemptions place a heavy administrative and financial burden on regional carriers, diverting resources away from core operations.
>
> **Ivana Kosić, Sustainable Development Manager, Air Serbia**

- **Onerous record-keeping:** Capturing and storing supporting evidence (NOTAMs, METARs, ATC messages, fuelling records) on a flight-by-flight basis consumes significant time and manpower.
- **Hidden costs:** Members report that some States charge airlines for issuing tankering exemptions or for processing certain compliance forms – fees not directly related to SAF itself.
- **Misaligned priorities:** Airline ground and office staff report spending disproportionate time "playing whack-a-mole" to close compliance gaps, diverting attention from safety, service quality and schedule reliability.

Recommendation

Simplify and harmonise reporting requirements across Member States, with a single EU-wide digital platform for SAF and anti-tankering compliance submissions and ensure fuel suppliers are obliged to provide airlines with timely, standardised proof-of-compliance documentation.

4 Scaling SAF fairly: Why Book & Claim is essential

Resolving the implementation flaws in RFuelEU Aviation is not a side issue – it is central to Europe's ability to cut aviation emissions without undermining regional connectivity. ERA members have committed to the EU's net-zero 2050 target and with the timescale of the ReFuelEU Aviation blending mandate. ERA airline members fully support the mandate itself; but the obvious flaws in its implementation must be remedied without delay.

4.1 A growing gap between ambition and reality

According to the latest edition of a respected global SAF forecast,[1] mandated SAF demand in the EU and UK is projected to reach 1.1 million tonnes in 2025, rising to approximately 4 million tonnes by 2030. Production, however, is unlikely to keep pace. Even if every announced project comes online as planned, EU and UK production would only deliver about 3.8 million tonnes by 2030 – already below mandated demand, without factoring in delays, cancellations or voluntary airline commitments.

This imbalance between rising demand and constrained supply makes one thing clear: every available tonne of SAF must be used as efficiently as possible, and the benefits fairly shared across the network.

[1] SkyNRG & ICF. (2025). SAF Market Outlook. https://skynrg.com/safmo25/

4.2 The bottlenecked value chain

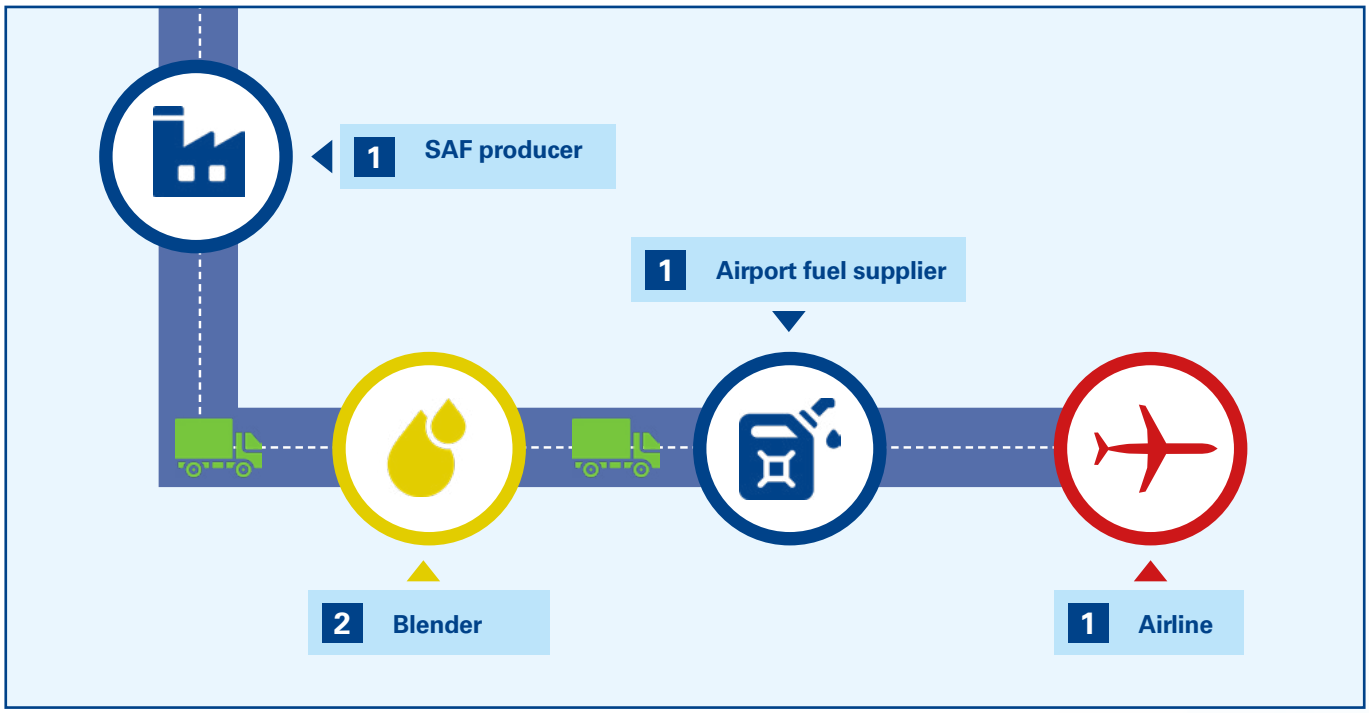


Figure 2. SAF value chain

Efficient SAF allocation is being held back by the current value chain. Most current and emerging SAF producers are new-entrant firms rather than legacy fossil fuel companies and therefore lack the latter's established supply chains. On top of that, most 'neat' SAF cannot be used directly because it lacks the aromatics needed to maintain tight seals in aircraft engines. As a result, it has to be blended at least 50/50 with conventional kerosene.[2]

The process typically looks like the above diagram.

Every step adds cost, delay and emissions – from ocean tankers moving fuel across continents to trucks distributing it to individual airports. This means that what should be a climate solution can itself become less efficient and more expensive.

In theory, where the SAF is uplifted should not matter. The atmosphere is global: 1 tonne of SAF burned in Spain delivers the same emissions benefit as 1 tonne burned in Finland. But in practice, **Europe's fuel market is controlled by a small number of legacy suppliers who act as gatekeepers. For new SAF entrants, breaking into these closed systems is expensive and often impossible.** Therefore, at those airports where airlines have little or no choice of supplier, this creates a perfect storm: restricted access, unjustified premiums and limited competition.

These twin challenges – distribution inefficiency and market power – make it harder and costlier for airlines to access SAF. They highlight the need for a smarter flexibility mechanism such as Book & Claim.

[2] IATA. (2024). SAF Handbook. https://www.iata.org/contentassets/d13875e9ed784f75bac90f000760e998/saf-handbook.pdf

4.3 Book & Claim

Book & Claim is already proven in other energy markets such as renewable electricity, and it can be a game-changer to help unlock barriers in aviation. It recognises that SAF has two components:

- The physical fuel molecules, and
- The environmental attributes – the emissions reductions achieved by replacing fossil kerosene.

Book & Claim separates these two, allowing the attributes to be traded independently while the physical fuel is used where it is most practical. Robust registries such as RSB, ISCC and IATA ensure transparency and avoid double counting.

How does that work in practice? For example, a SAF producer in Spain may 'book' the environmental attributes of its fuel in a secure online registry. The actual fuel molecules may be blended and used as normal jet fuel in an airport close to the production location, thus reducing transport emissions and costs. Meanwhile, these environmental attributes in the registry may be sold (directly or via an intermediary) to a Finnish airline which will purchase normal jet fuel at its local airport, but which at the same time can 'claim' the emissions reductions of the Spanish SAF.

It is worth noting that ReFuelEU Aviation already gives suppliers a version of this flexibility, allowing them to concentrate SAF supply at a few major airports and average it across an entire country. Airlines, however, are left out: they remain tied to local SAF availability, which is uneven at best.

This is where Book & Claim matters now. Europe cannot meet its SAF mandate solely with domestic production; imports will remain necessary. Book & Claim allows these volumes to be accounted for fairly, without forcing costly, inefficient fuel transport to every single airport. **What matters for the climate is that fossil kerosene is replaced by SAF – not where the SAF molecules are burned.**

> SAF is not a silver bullet, but replacing fossil jet fuel with SAF is the industry's biggest single measure to cut aviation emissions. Thus it's vital that we scale up SAF production. The earth's atmosphere doesn't care where in the world the SAF is used – what's important is that it's replacing fossil fuel. Book & Claim is a robust system, already well established in other energy markets such as renewable electricity. A robust Book & Claim system transparently accounts for and tracks emissions savings, and prevents any double counting. Above all, it avoids the complexity and the cost, both in money and emissions, of distributing physical SAF to every airport. Making the environmental benefits of SAF cheaper and more widely available is a win-win for SAF producers, airlines, consumers, and the planet.
>
> **Patrick Edmond, Chief Commercial Officer, Future Energy Global**

Book & Claim is not necessarily a permanent substitute for infrastructure and supply chains. It is especially important as an interim solution to ensure fairness, reduce costs, and accelerate SAF uptake while production and distribution systems mature. Multiple industry stakeholders have called for its adoption, and the European Commission has recently (August 2025) launched a feasibility study for a Book & Claim system for alternative fuels.

In parallel, many airlines are already considering Book & Claim for their voluntary SAF commitments, attracted by the ability to work with more efficient producers and to avoid the logistics associated with moving and blending physical SAF at their airport.

4.4 Beyond airlines: A collaborative approach to emissions

Decarbonising aviation is not just an airline challenge – it is a shared responsibility across the value chain. The GHG Protocol, one of the key global standards for carbon accounting, makes this clear:

- For an airline, flight emissions are Scope 1 – its own direct emissions.
- For a company whose employees are on board, the same emissions are counted as Scope 3 – indirect emissions from business travel.

In other words, the same tonne of CO_2 shows up in two places: Scope 1 for the airline, Scope 3 for the corporate customer. That overlap creates an opportunity: joint action.

When airlines use SAF, they generate environmental attributes that reduce their Scope 1 emissions. Through Book & Claim, these same attributes can also be transferred to their corporate customers, enabling them to address their Scope 3 travel emissions.

This is more than an accounting exercise – it's a practical partnership:

- Airlines gain cost relief, because corporates are willing to share the net price for SAF.
- Corporates gain credible reductions in their travel footprint, aligned with their net-zero commitments.
- Together, they send a stronger demand signal for SAF, accelerating production and availability across Europe.

Book & Claim, therefore, is not just a tool for airlines – it's a way to make aviation decarbonisation a collaborative effort.

Additionally, smaller regional airports, while not in the immediate scope of ReFuelEU Aviation, could also play a constructive role in scaling SAF. By equipping them as additional points of physical supply, Europe could widen the base of uplift beyond congested hubs, ease distribution constraints, and make Book & Claim more effective by anchoring it in a broader supply network.

Recommendation

Introduce a Book & Claim system as an interim measure to give airlines the same flexibility that fuel suppliers already enjoy under ReFuelEU. This would allow airlines to claim emissions reductions under EU ETS irrespective of where SAF is physically uplifted, ensuring that every tonne of SAF counts while the supply chain scales up.

5 Conclusion

ReFuelEU Aviation is a landmark regulation with the potential to accelerate Europe's decarbonisation. Yet its early implementation has exposed flaws that risk undermining regional airlines, distorting markets and weakening the credibility of Europe's climate policy. The issues highlighted in this report – misaligned flexibility, market power and pricing abuses, disproportionate administrative burdens, and the unintended consequences of Article 5 – are not matters of resistance to SAF, but barriers to its fair and efficient adoption.

Regional airlines are committed to the SAF mandate and to Europe's 2050 net-zero target. What they ask for is not exemption, but alignment: rules that work in practice as well as in theory, oversight that ensures transparency and fairness, and interim tools such as Book & Claim to bridge the gap until production and infrastructure can catch up.

If Europe wants aviation decarbonisation to succeed without sacrificing connectivity, these fixes are not optional – they are necessary and urgent. This is why ERA calls for a **politically prioritised revision of ReFuelEU Aviation** to ensure that climate ambition is delivered in a fair, effective, and efficient way.

ERA recommends

- **Ensure political priority is given to revising ReFuelEU Aviation** to correct foundational flaws before they become entrenched.
- **Align flexibility rules** between ReFuelEU Aviation and the EU ETS so that both airlines and suppliers can benefit equally.
- **Strengthen oversight of pricing practices** to prevent unjustified SAF surcharges and bundled fuel deals.
- **Adopt Book & Claim as an interim mechanism,** ensuring every tonne of SAF purchased counts, regardless of where it is physically supplied, while the market remains immature.
- **Fix Article 5** so that anti-tankering provisions apply only where there is a genuine risk, without penalising lifeline routes.
- **Simplify compliance and reporting**, through a single EU-wide platform and harmonised documentation.

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European Regions Airline Association Limited is registered in England & Wales. Company No: 8766102

October 2025