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Possibility to implement more ambitious national blending mandates

Joint letter on behalf of DK, DE, SE, FI, NL, AT, and LU

Increasing the use of sustainable aviation fuels (SAF) is one of the most achievable and effective pathways to reduce greenhouse gas emissions from aviation in the short to medium term, and will play a significant role in decarbonizing the aviation sector in the coming decades. We – the signing Member States – therefore welcome the European Commission's proposal on a blending mandate for sustainable aviation fuels (ReFuelEU Aviation), and its aim to gradually decarbonize aviation in a coordinated way at the European level.

Given the cross-border nature of aviation, an international approach is necessary. An EU-coordinated approach should ensure a collective effort to reduce emissions and stimulate the demand for SAF, in order to ramp up the production and deployment of SAF in the EU. We therefore strongly support a high overall level of ambition on the EU-wide targets.

At the same time, we believe there is room for increasing the ambition further regarding sustainability and boosting of SAF by allowing Member States to go beyond minimum EU standards. This could also provide a basis for developing new innovative approaches and technologies. A harmonized approach as proposed should not hinder Member States' possibility of further increasing the sustainability of aviation or constrain the production and deployment of SAF.

Allowing Member States to go beyond a minimum level would be compatible with the Single Market and with the projected availability of SAF. Higher national targets do not undermine the level playing field or create competitive distortions across the Single Market, as additional costs will be imposed on the implementing states themselves. Based on other examples of regulations, it is possible to include the opportunity of national self-determination.

The potential of available sustainable aviation fuels should not be underestimated. Reaching the EU's target of becoming climate neutral by 2050, and the first step of at least 55 percent greenhouse gas emissions reduction by 2030, will require a swift transition of all modes of transportation. The aviation sector faces higher costs than other sectors given limited production of commercial-scale SAF and limited opportunities to electrify in the short term. However, usable SAF-technologies are available, but we need investments to scale up production and reduce costs of SAF.

Higher national ambition levels can send a clear signal to producers of SAF and speed up technology readiness, as well as contribute to a swifter transition to green fuels, bringing down costs sooner. Driving down the cost of SAF is necessary to ensuring a swift transition, and will benefit all member states.

We – the signing Member States – therefore propose that the ReFuelEU Aviation regulation should set common minimum standards, and allow member states to set more ambitious targets, both at the domestic level and/or for outbound aviation, while ensuring that high minimum levels set forth in the regulation are met. It is the firm belief of the signing Member States that this will create EU-wide benefits, as well as a swifter decarbonization of the aviation sector.

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