

# CAPACITY BUILDING ON SAF & CORSIA ELIGIBLE FUELS NAMIBIA

## SAF in other Market Based Measures (MBMs)

Mark Latimer  
Environment Expert

Windhoek, Namibia  
16 to 18 July 2025

**Working for quieter and cleaner aviation.**

**Your safety is our mission.**

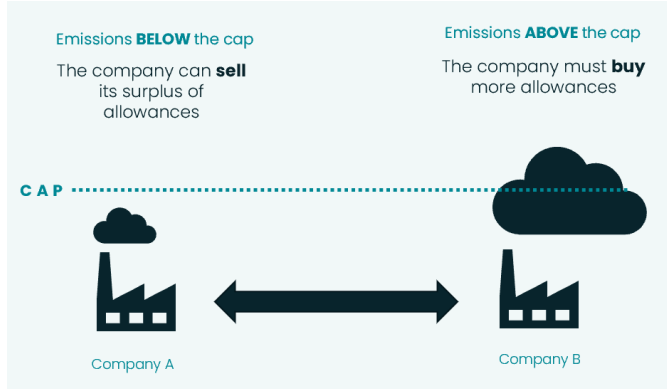
# What are Market Based Measures (MBMs)?

- MBMs are policies that use markets, price and other economic variables to provide incentives and disincentives to guide the behaviour of regulated activities to reduce their emissions and reduce a sector's negative environmental impact
- There are three types:
  - Levies
  - Emissions Trading
  - Offsetting
- MBMs are used to address the climate impact of aviation beyond what can be achieved through technology, operational measures and SAF

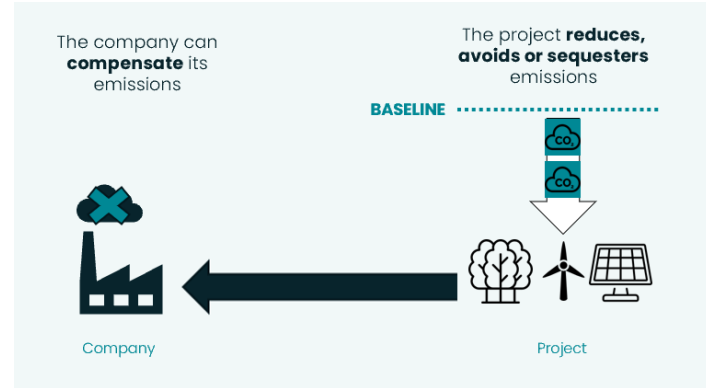
# What is the difference between ETS and CORSIA?

# The Carbon Market - Mechanisms

## Emissions Trading (Cap and Trade) Carbon Allowances



## Offsetting Carbon Offsets

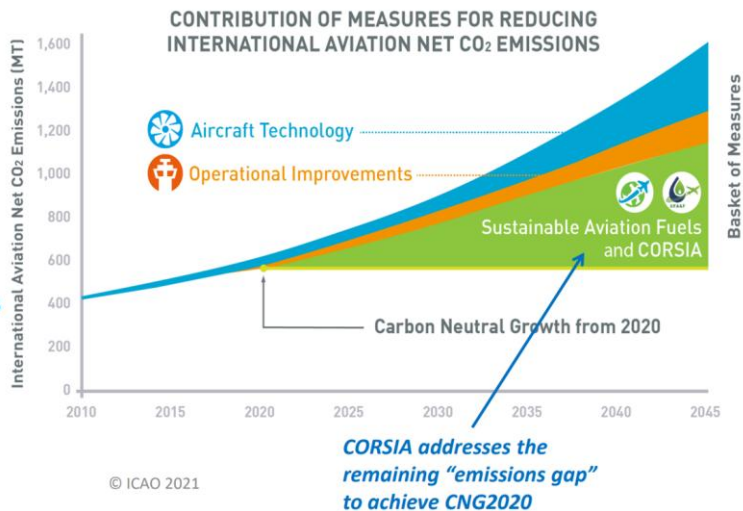


e.g., EU ETS, Swiss ETS, UK ETS,  
R. Korea ETS, China ETS

CORSIA  
Voluntary offsetting

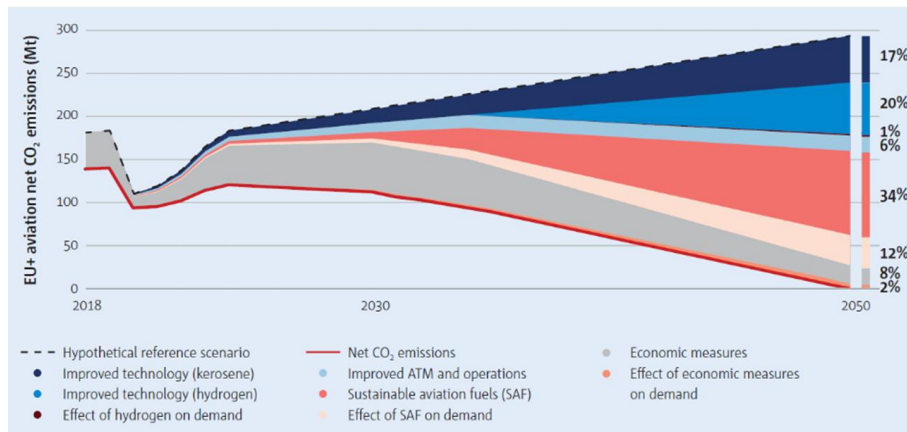
# The importance of Market Based Measures

MBMs are used to address the climate impact of aviation beyond what can be achieved through technology, operational measures and Sustainable Aviation Fuel



Source: Introduction to the ICAO Basket of Measures to Mitigate Climate Change

This figure relates to Reaching net zero CO<sub>2</sub> emissions by 2050 from all flights within and departing from the EU



Source: European Aviation Environmental Report 2022 (EASA)

These diagrams show the important role of drop-in SAF in the mitigation of aviation CO<sub>2</sub> emissions in the short-term using existing global fleet

# ETS – The Basics

# Does an Operator have ETS Compliance Obligations?

- This analysis requires the operator to differentiate between the *'full-scope'* flights and emissions and those subject to reporting obligations

Certain flights due to their nature or purpose are excluded from this analysis



## Step 1

- Have I carried out 'full-scope flights with emissions above the threshold in the monitoring year?
- If the answer is 'Yes' – go to Step 2:



## Step 2

- Have I carried out 'flights subject to reporting obligations in the monitoring year?
- If the answer is 'Yes' – even just one flight, you will have a compliance obligation and be required to report your emissions and surrender

# Exclusion thresholds



- **Commercial Aircraft Operators**
  - $\leq 243$  '*full-scope*' flights for three consecutive periods -  
January to April; May to August; September to December; OR
  - Emissions of  $\leq 10,000$  tCO<sub>2</sub> from '*full-scope*' flights
- **Non-Commercial Aircraft Operators**
  - Emissions of  $\leq 1,000$  tCO<sub>2</sub> from '*full-scope*' flights



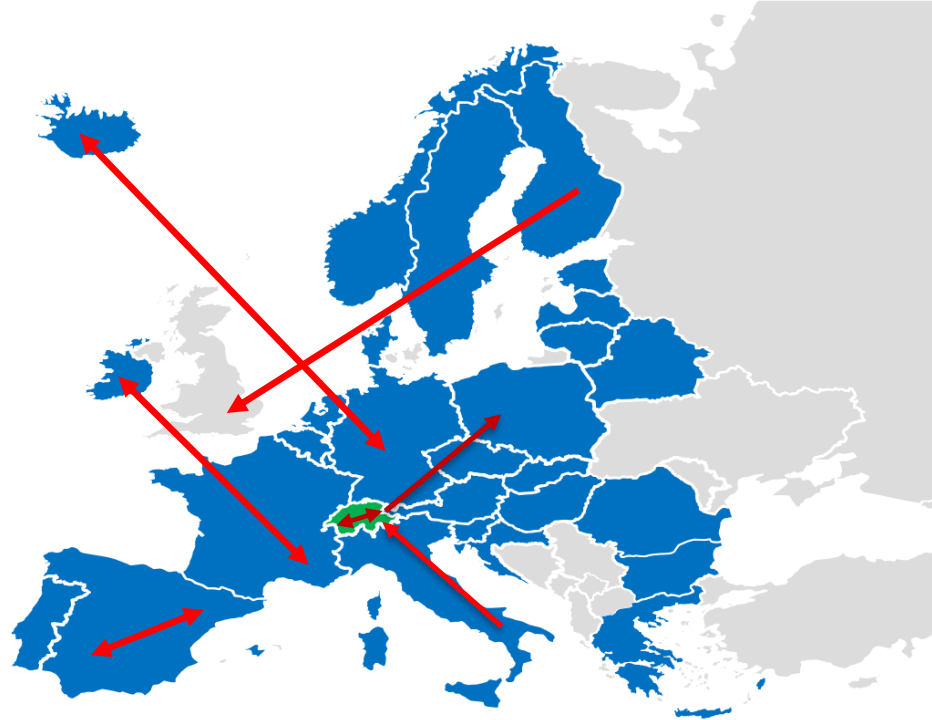
# EU ETS and UK ETS

- Aircraft operators must report their CO<sub>2</sub> emissions from the flights that fall under the reporting requirements of these schemes
- Aircraft operators must then surrender allowances equivalent to these emissions
- Aircraft operators can reduce their emissions and the allowances that they need to surrender (compliance costs) by 'using' SAF and making a SAF Emissions Reduction Claim

# EU ETS and Swiss ETS

# EU ETS and Swiss ETS

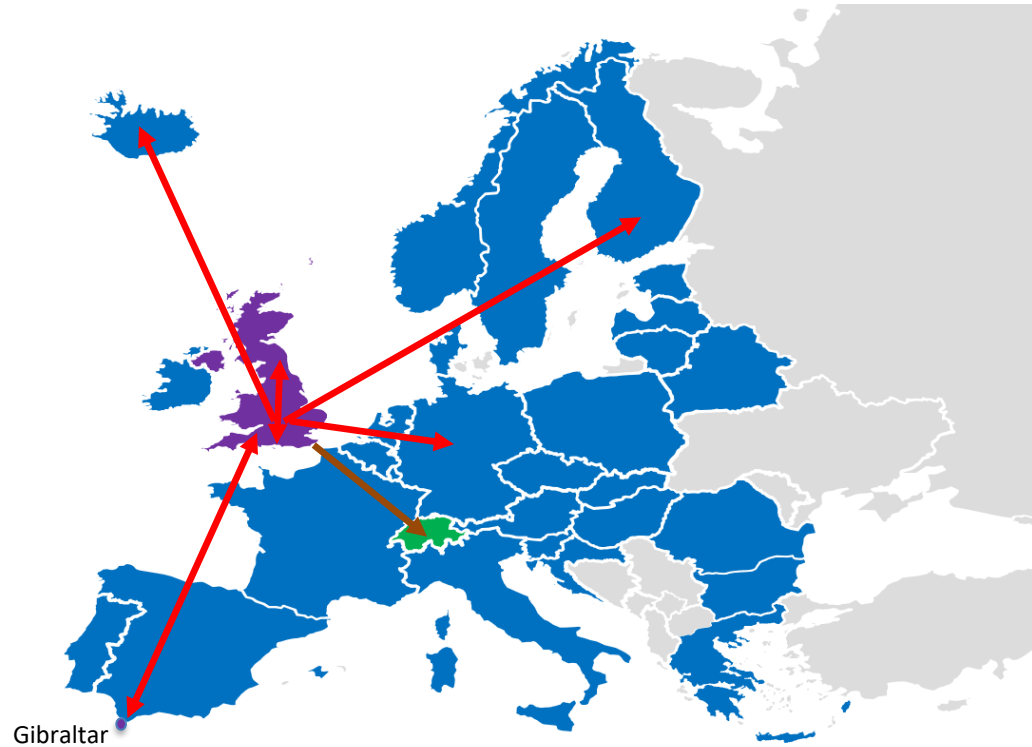
- From 2013  
Intra-European Economic Area (EEA) flights
- From 2020 link with Switzerland:
  - EEA-Switzerland in EU ETS
  - Domestic Switzerland and Switzerland-EEA in Swiss ETS
- From 2021  
Flights from EEA to UK
- From 2023  
Flights from Switzerland to the UK in the Swiss ETS
- Same scope until 2023 with changes from 1 January 2024 in relation to outermost regions
- **Allowances**  
EUA, EUAA, CHU and CHUA



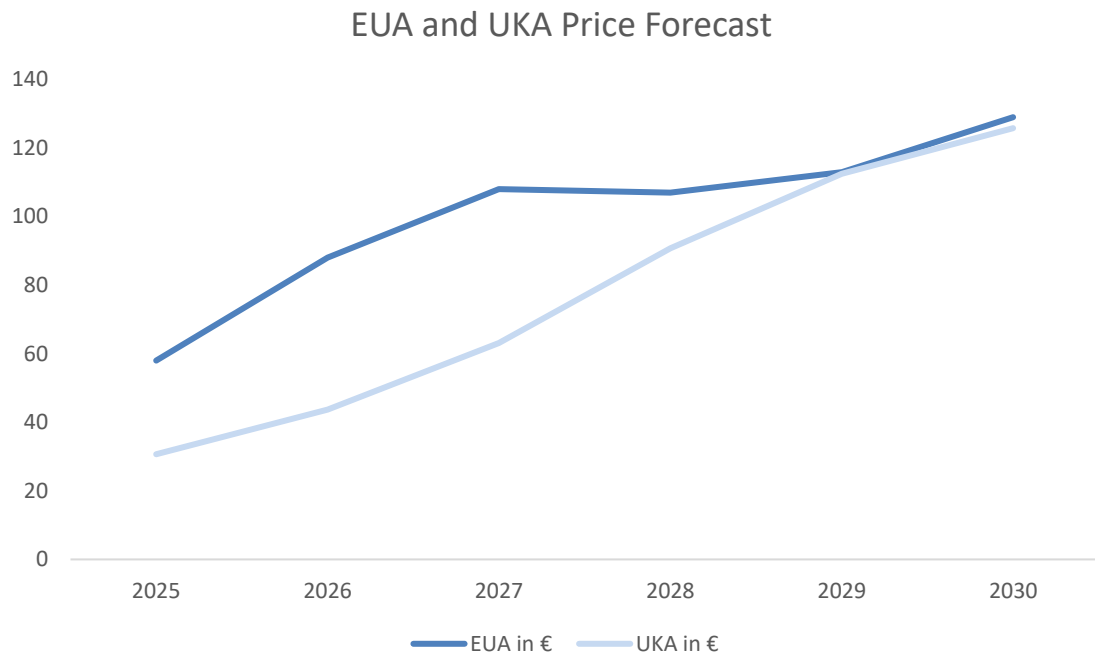
# UK ETS

# UK ETS

- From 2021
  - Domestic UK flights
  - Flights from UK to EEA
  - Flights between UK and Gibraltar
- From 2023 scope extended to include to Switzerland
- **Allowances**  
UKA



# EUA/UKA Forecast



# Making a SAF Emissions Reduction Claim in EU ETS and UK ETS

# SAF Emissions Reduction Claims in ETS

- To make an Emissions Reduction Claim an airline must use a SAF that is eligible and certified as compliant with the sustainability criteria applicable in each scheme
- There are differences in how claims are made in these two schemes



# Comparing Emission Reduction Claims in EU and UK ETS

	EU ETS	UK ETS
Reference	Commission Implementing Regulation (EU) 2018/2066 and 2023/2122, Guidance Document 2 and 3, Technical Guidance on Support Documentation for Sustainable Biofuel Claims	The Greenhouse Gas Emissions Trading Scheme Order 2020 (the UK ETS Order), UK ETS Aviation Guidance Note (Emission Reduction Claims)
Sustainability Criteria	Sustainability framework of the EU Renewable Energy Directive (RED II)	Sustainability criteria in Schedule 1 of the Renewable Transport Fuels Obligation Order (RTFO)
Emissions Saving Threshold	65%	65%
Verification	EU ETS Accredited Verifier	UK ETS Accredited Verifier

# Comparing Emission Reduction Claims in EU and UK ETS

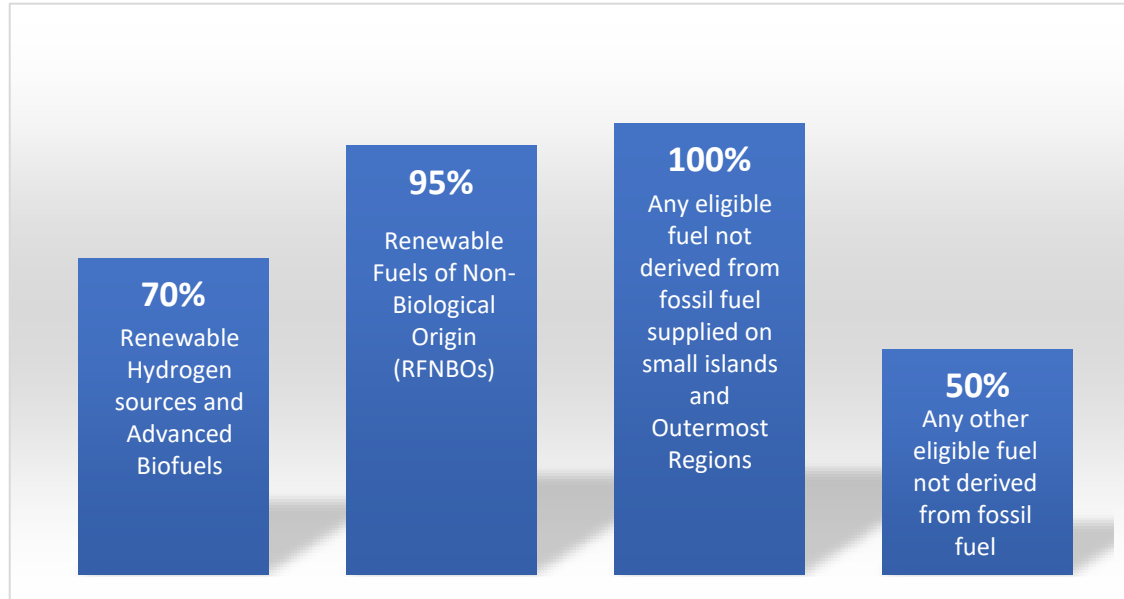
Aspect	EU ETS	UK ETS
Does the 'use' of SAF need to be reflected in the EMP?	Yes	Yes
Is there a Geographical limit on eligible SAF?	Yes	No
Are there limits on the amount of SAF claimed?	Yes	Yes
How are emissions reduced?	Mass of neat SAF is Zero (0) Rated	Mass of neat SAF is Zero (0) Rated
How is SAF accounted for?	ERCs based on Purchase and delivery to an individual aircraft or aerodrome fuelling system. Individual fuels reported and apportioned to individual flights or aerodrome pairs	ERCs based on Purchase and Delivery to an individual aircraft or aerodrome fuelling system. Emissions reported based on standard fuels and then mass of neat SAF deducted
Do claims need to be verified?	Yes	Yes
Is Double-Counting addressed?	Yes	Yes

# Emission Reduction Claims - Documentation Requirements

Type of Documentation	EU ETS	UK ETS
Proof of Purchase and Delivery	✓	✓
Proof of Sustainability (PoS) or equivalent	✓	✓
Details of any biofuel batch whole or in part sold or transferred to a third party	✓	✓
Signed declaration that the biofuel claimed and zero-rated has not been claimed elsewhere	✓	✓
Relevant flight information	Yes – if SAF is delivered to a specific aircraft	Yes – if SAF is delivered to a specific aircraft

# EU ETS from 2024 – SAF Allowances

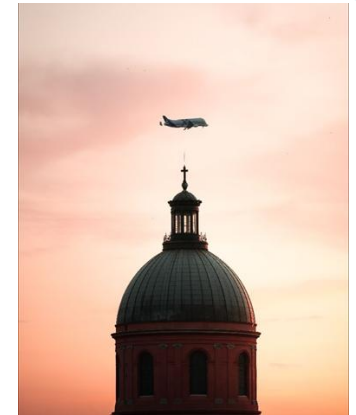
- 20 million allowances set aside for commercial aircraft operators to cover all, or part of the price differential between the use of conventional aviation fuel and SAF and other aviation fuels not derived from fossil fuels



# AIRBUS Transport International (ATI)

# AIRBUS Transport International

AIRBUS



# AIRBUS Transport International – Operation

## → Mission

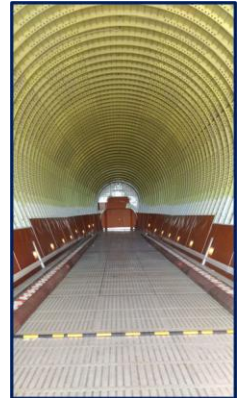
- Transport of Airbus aircraft parts between Airbus plants (AOC in 1996)

## → Fleet

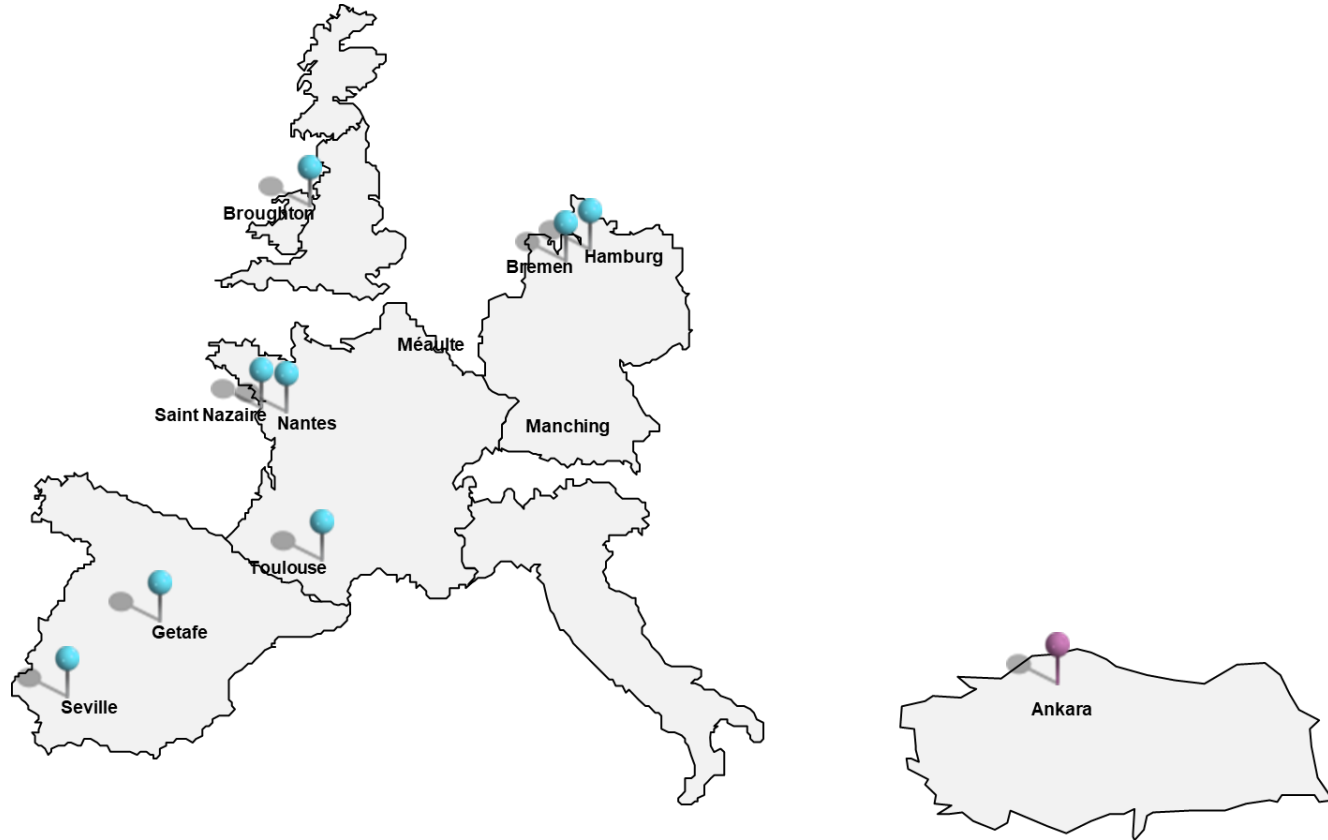
- 6 Beluga XL

## → Network

- Europe, composed of industrial and military airports and a few of international airports (11 stations)



# AIRBUS Transport International – Network





# AIRBUS Transport International – ETS Experience

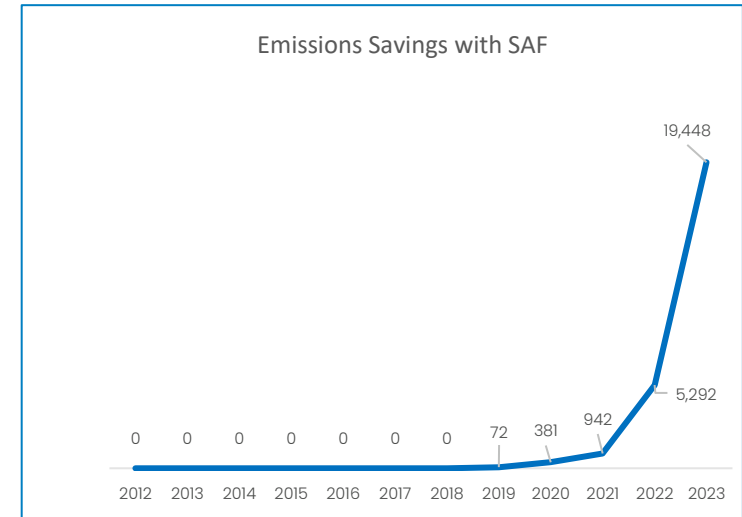
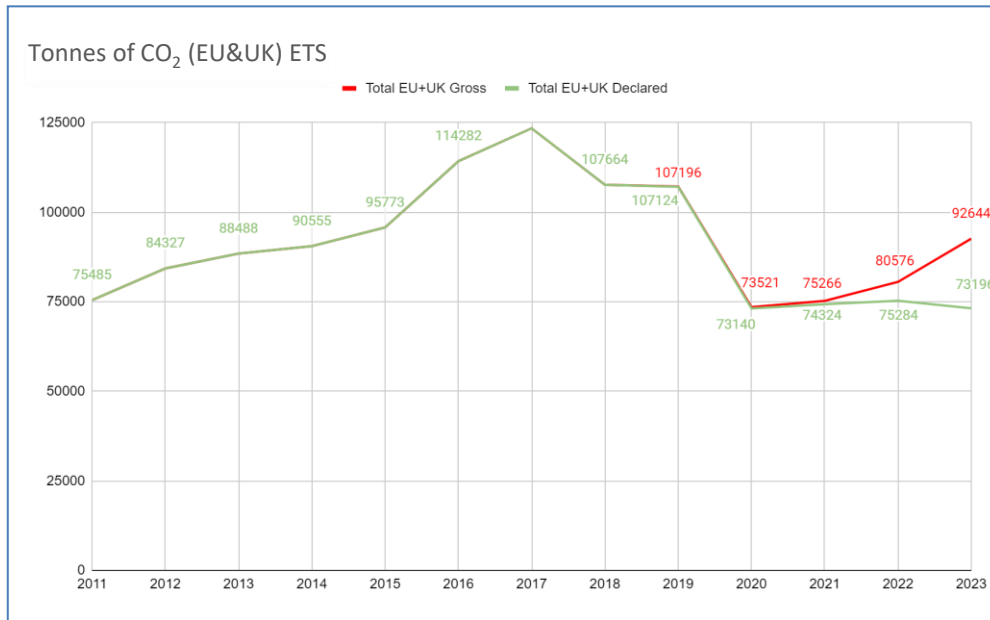
ATI has been reporting under EU ETS since 2012

	2019	2020	2021	2022	2023
Fleet	A300-600ST	A300-600ST, A330-732L	A300-600ST, A330-732L	A300-600ST, A330-732L	A300-600ST, A330-732L
SAF	Ratio over total fuel <0.5% XFW (11 flights) Blending: ~18%	Ratio over total fuel 1.4% SAF / 0.5% Neat XFW (62 flights) Blending: ~35%	Ratio over total fuel 3.5% SAF / 1.23% Neat XFW,CEG (91 flights) Blending: ~35%	Ratio over total fuel 20% SAF / 6% Neat XFW,CEG,BRE,TLS Blending: ~35%	Ratio over total fuel ~50% SAF / 20% Neat XFW (35% & 49% M&B), CEG (50%), BRE (38%), TLS (30% & 38%), SNR (30%), BYF, EGT
CO <sub>2</sub> savings (tonnes)	72 (EU ETS only)	381 (0.5%) (EU ETS only)	942 (1.25%) (EU & UK ETS)	5,292 (6.5%) (EU & UK ETS)	19,448 (21%) (EU & UK ETS)

Ratio of fuel use <0.5% to ~50% SAF

# AIRBUS Transport International – ETS Experience

## ATI – Emissions, SAF use and savings



# AIRBUS Transport International – SAF Sourcing

- AIRBUS dedicated SAF project team
- Criteria for SAF sourcing: RED II sustainability and traceability criteria
- Major difficulty – SAF sourcing due to 'neat' SAF availability



# SAF Emissions Reduction Claims – ETS 2019 to 2021

- Flight by Flight approach – less than 100 flights
- EU ETS
  - Fuel type managed on flight-by-flight basis, based on fuel receipts, purchase records and sustainability reports
- UK ETS
  - All flights are reported in Jet A1 and then a total amount of biomass is reported, based on purchase records, fuel receipts and sustainability reports

# SAF Emissions Reduction Claims – ETS 2022/23

- 1000 + SAF flights
- Exact blending is sometimes known after the flight and blending not always the same
  - Not manageable to amend all the flights afterwards
  - 'Simplified approach' with SAF total volume per departing airports
- EU ETS
  - Managed by fuel type
  - Not possible to report a total amount of biomass
  - SAF needs to be reportoned to the SAF per leg for the departing airport where the SAF was delivered, proportionally to the total CO<sub>2</sub> per leg (*based on purchase records, fuel receipts and sustainability reports*)
- UK ETS
  - No change (apart from online system used). Total amount of biomass is reported

# SAF Emissions Reduction Claims in ETS

## → Difficulties

- Rules are not fully harmonised between the EU and UK
- Difficult to get complete sustainability documents in line with authorities' expectations

## → Risks

- Airbus ambitions are very challenging vs SAF availability
- New strategies for SAF sourcing may not be in line with EU ETS rules to claim

# Conclusion

- SAF is the most efficient manner to reduce our carbon footprint
- No impact on our aircraft performance
- Full adherence of our pilots

## BUT

- Difficult to claim
- Time consuming
- Unstable topic – rules evolve rapidly

Capacity Building  
Drop-in Fuel  
PtL  
Life Cycle Emissions  
Used Cooking Oil (UCO)  
Co-processing  
ASTM D4054  
Cost  
Feedstock  
Sustainability Certification Schemes  
Socio-Economic  
CO<sub>2</sub> Land use change  
GHG Emissions  
Sustainability Criteria  
Safety  
SAF  
Alternative  
ASTM D7566  
Risk  
Technology  
Sustainability  
FT-SPK  
RSB  
Certification  
CAPEX  
HEFA  
ASTM D1655 DEF Stan 91-091  
'neat' SAF  
Environmental  
Municipal Solid Waste  
CORSIA Eligible Fuels  
Approved ASTM Pathways  
Blending  
AtJ



Thank you for your attention

**Working for quieter and cleaner aviation.**

**Your safety is our mission.**

[easa.europa.eu/connect](https://easa.europa.eu/connect)



An Agency of the European Union 