



May and June 2024

Global

Update on IATA's initiatives to unlock and scale up CORSIA EEU's supply

In accordance with IATA's projection, for the first CORSIA compliance phase from 2024 to 2026, airlines would need to offset between 64 Mt to 162 Mt of CORSIA Eligible Emissions Units (EEUs). Currently, only 4.6 Mt of CORSIA EEUs have been made available under Guyana ART Tree credits. Scaling up the availability of CORSIA EEUs has been identified as one of IATA's advocacy priorities for the second half of 2024.

As the first step, IATA will send a survey to the States, navigating their awareness and readiness level of authorizing the usage of those Units for CORSIA, by signing off a letter of authorization (LoA) and conducting a "corresponding adjustment". Essentially, the LoA ensures the EEUs claimed by airlines for CORSIA compliance will not be included in the host country's Nationally Determined Contributions (NDCs) under the UNFCCC Paris Agreement, and the "corresponding adjustment" must be performed to reflect this fact in the country's emissions registry.

For more information, please contact: Yue Huang (huangy@iata.org)

IATA's position on airports' SAF incentives, modulations, or charges

Over the past years, airports have introduced SAF incentives or modulations allegedly to encourage SAF use. Mechanics vary, from a SAF "subsidy" at LHR financed from the NOx charges, to a reduction linked to the amount of SAF uplifted like at Swedavia airports. IATA has a position to oppose airport charge incentives, and has used arguments from other environmental airport charges to oppose these so-called incentives. Complementing existing papers on other topics (www.iata.org/airport-charges), IATA recently released a [position paper](#) on such SAF initiatives, emphasizing:

- Airports should prioritize efficient global SAF deployment using existing infrastructure, while ensuring transparency, fair access, and government-funded incentives to lower costs for airlines and consumers.
- Any locally imposed charges or taxes related to SAF usage should be avoided as they would conflict with the goal of scaling up SAF production and will divert investment away from aviation's biggest lever for net zero transition.
- Airports SAF incentives, modulations, or charges are unnecessary and ineffective in securing additional SAF production or airline adoption. They only create an administrative burden and may distort competition.
- Airports can significantly advance SAF deployment by supporting global mechanisms (notably regarding SAF accounting), ensuring supplier access to existing fuel infrastructure, advocating with governments for policies to encourage SAF production incentives and avoid new taxes, and supporting industry education campaigns for passengers.



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SAF Sustainability Certification Guidance Document

Airlines that purchase SAF would like to claim the environmental benefits of the SAF against regulatory schemes such as EU ETS and CORSIA. However, airlines provided feedback that there was still confusion about what documentation they needed to receive from their SAF suppliers for them to make the claims. To issue the right sustainability documentation to airlines, SAF suppliers must go through sustainability certification but some suppliers were still unclear about the requirements and process for sustainability certification.

A SAF sustainability guidance document has been developed in collaboration with RSB and ISCC, two sustainability certification scheme providers that offer certification schemes compliant with EU RED and CORSIA requirements. The guidance document aims to provide clear guidance regarding the requirements and criteria for SAF sustainability certification. This can promote consistency in the interpretation and application of sustainability standards across different stakeholders and facilitate the certification process.

The guidance document has been published on 24 June 2024 and can be found [here](#). An Insight session going more into the details of the Guidance Document is scheduled for 18 July 2024, 13:30 to 14:15 CEST and more details can be found [here](#).

For more information, please contact: Malvyn Tan (tanjcm@iata.org)

IATA SAF Handbook

The [IATA SAF Handbook](#) was written for airlines who want to learn the basics about SAF. It's intended to be used as a quick reference guide (a handbook!), a starting point with links to many more resources.

It covers all the basics from what is SAF to stakeholder engagement, including regulatory considerations and SAF accounting. It updates the technical definitions and references from the previous edition (2015), and dives deeper into sustainability considerations for different feedstocks.

Furthermore, please find the Insight session presenting key highlights from the SAF Handbook [here](#).

For more information, please contact: Antony Baker (bakera@iata.org)

IATA's publication on Access to Fuel Infrastructure as an Enabler for Aviation's Decarbonization

IATA wants to highlight the importance of open access to existing jet fuel infrastructure, the impact on competition in the aviation fuel market, and how this ultimately affects the availability and price of SAF. This publication provides an overview of the operation and management of the fuel supply chain including:

- **Aviation fuel infrastructure:** An explanation of the components of the supply chain, on and off the airport.
- **Ownership and Management:** Description of three Different types of ownership and management, main characteristics, and the impact on access to infrastructure.
- **Open and Restricted Access:** Definition, advantages, and disadvantages of having open or restricted access to the infrastructure including examples of different airports around the world.



- **Analysis of the ownership model, and type of access** to the infrastructure in 123 airports around the world covering 48% of global fuel uplift. The study shows that 73 airports (59%) have some form of restricted access corresponding with ownership by a single fuel supplier or by a limited group of fuel suppliers.

You can find the publication [here](#), and the recording of the insight session [here](#).

For more information, please contact Alexandra Calvo (calvoa@iata.org)

Europe

EU: Update regarding the inclusion of non-CO2 effects of aviation within EU ETS' MRV

Following IATA's advocacy efforts over the last few months, two developments regarding the efforts to include the non-CO2 effects of aviation within EU ETS' MRV framework are worth noting, with the caveat that the issue continues to be in constant development:

- The European Commission's **recognition of the need for scientific validation of non-CO2 effects** and that the **MRV constitutes a stand-alone, distinct exercise from carbon pricing**.
- There are indications that the **application scope has been temporarily reduced for 2025 and 2026 to match that of the current ETS scope** (essentially mirrors the "stop-the-clock" decision), addressing the issue of "extraterritorial effects".

While IATA will continue its efforts to ensure that these developments are retained in the final text of the Implementing Act, it continues to raise concerns about other aspects of the initiative. This includes the **infeasible timeline for airlines to submit monitoring plans** for their non-CO2 effects, the proposal to use **unrealistic default values** in the event of data gaps (especially regarding fuel specifications), and the **continued push to represent non-CO2 effects across low time horizons of the Global Warming Potential (GWP)** metric which would over-represent their effects.

In addition, there are developments at the international level within ICAO premises on better understanding the non-CO2 effects of aviation and considering potential mitigation actions. The [2024 ICAO Symposium on Non-CO2 Aviation Emissions](#) is one such effort, in which IATA will participate.

For more information, please contact: Yue Huang (huangy@iata.org) and Abijith Amberi Premanand (amberipra@iata.org)

EU: Guidelines on the application of the exemptions referred to in Article 5 of the ReFuelEU Aviation (RFEUA) regulation

The European Commission (EC) has recently circulated an initial draft of the guidelines on anti-tankering exemptions under Article 5 of the ReFuelEU regulation. The draft guidelines were shared with stakeholders for specific technical comments and edits, to be submitted to the Commission by Monday 1st July.

IATA has commented on three main areas:

- The **absence of consistency with local safety regulations**, some of which consider a higher contingency fuel requirement, which makes airlines unable to uplift the required 90% of fuel needed for departing flights.
- Justifying requests for exemptions puts a **significant additional burden on aircraft operators** – and consequently, on the administering authorities who will have to evaluate the requests. These requirements, which are also applicable to requests from third-country aircraft operators, may raise



similar extraterritoriality concerns as the ones brought about by the implementation of the full-scope EU ETS.

- The exemptions based on structural supply difficulties only consider cases where higher fuel prices “stem from the geographic characteristics of a given Union airport”. IATA **reiterated a request to include cases where significant price differences are caused by market conditions** such as fuel suppliers being in a dominant position (e.g., monopolies).

For more information, please contact: Daniel Chereau (chereaud@iata.org)

UK: Consultation to include Greenhouse Gas Removals (GGRs) in UK ETS

In May 2024, the UK Government published an open consultation to include Greenhouse Gas Removals (GGRs) in the UK Emissions Trading Scheme (ETS). This follows a commitment made in July 2023 to consult on proposals regarding the integration of engineered GGRs (e.g. Direct Air Capture) into the UK ETS and consideration of high-quality nature-based GGRs, subject to further work taking into consideration potential issues regarding permanence and land-use change associated with the method. The consultation proposes options and seeks views on the principle for policy design when integrating GGRs into UK ETS, cap policy designs, allowance design for GGRs, and permanence of carbon storage and pathways to integration. In general, the UK Government is exploring the following cap policy designs in this [document](#).

Option 1: Increase the overall cap of allowances in UK ETS by additionally accounting for GGRs entering the market, with no upper limit on that supply.

Option 2: Maintain the overall cap of allowances and replace each emissions allowance (UKA) every time an allowance is issued to GGR operators.

Option 3: Set a new cap of allowances depending on the expected supply of GGRs that would enter the UK ETS.

The consultation is open to aviation sectors with obligations under UK ETS and inputs can be provided [here](#). The consultation is open until **15 August 2024**.

For more information, please contact: Rabab Mehnaz (mehnazr@iata.org)

Israel: Ben Gurion Airport (TLV) – noise restrictions consultation

A new regulation introducing a noise quota system along a movement cap, based on the UK system, is being proposed for consultation at Ben Gurion Airport (TLV). The consultation is open for public comments until 14 July 2024 at 11.59 pm. We encourage airlines operating to TLV to respond to the consultation. IATA will provide their comments on the proposed scheme.

For more information or a copy of IATA’s response, please contact: Yue Huang (huangy@iata.org) or Kobi Zussman (zussmank@iata.org)

Americas

Canada: International Waste Management, regulations amendment proposal

IATA has recently formed a collaborative working group comprised of various industry stakeholders, including airlines, airports, and associations. This group aims to address international cabin waste management in light of the anticipated changes to the Health of Animals Regulations proposed by the Canadian Food Inspection Agency (CFIA). By mid-July, the industry will have the opportunity to offer feedback on potential treatment and disposal options for international waste. The working group is currently in the process of composing a joint letter and gathering insights from the updated version of a report commissioned by IATA titled "International Catering Waste – A Case for Smarter Regulation", which will be published soon.

The current version of the report can be found [here](#).



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[Asia Pacific](#)

New Zealand: International Visitor's Conservation and Tourism Levy consultation

The New Zealand government held a consultation to seek views on whether to increase the NZD35 International Visitor Conservation and Tourism Levy (IVL), by how much, and how the revenue should be spent. The IVL aims to address current challenges in the tourism and conservation systems in New Zealand.

IATA provided a submission to recommend that the IVL should not be increased and that the IVL review process be deferred until such a time when passenger numbers in New Zealand have returned to pre-COVID levels. As the IVL also contributes towards the government's overall economic strategy of productive, sustainable, and inclusive growth, IATA recommended that the funds collected from the IVL be allocated to the research and development of a SAF industry in New Zealand.

For more information, please contact: Kelvin Lee (leek@iata.org) and Karl Leong (sumk@iata.org)

Thailand: National Oil Plan

Following our last update, IATA has further engaged the CAAT and the Department of Alternative Energy Development and Efficiency (DEDE) through a submission on the National Oil Plan being drafted by DEDE. The plan includes both supply and demand side measures for SAF, with a phased SAF mandate complemented by potential investment and tax incentives.

IATA is pleased to note that the government recognizes the importance of putting in place necessary policies at the national level to promote and drive investments in SAF. IATA commended the government for the policies that are aligned with industry perspectives and recommended that flexibility for the national SAF mandate be applied across the entire mandate period from 2027-2037. IATA also recommended that the SAF produced in Thailand should meet internationally recognized sustainability criteria and be certified accordingly prior to the introduction of the SAF mandate. IATA further provided suggested national policy considerations to stimulate and expedite SAF production in the country and proposed that the government conduct regular reviews with stakeholders to ensure the efficiency and effectiveness of the policies. IATA will continue to engage the government on the National Oil Plan when opportune.

For more information, please contact: Kelvin Lee (leek@iata.org) and Karl Leong (sumk@iata.org)

Consultation reminder

TLV noise restrictions consultation: Please provide your input [here](#). The consultation is open until 14 July 2024.

ORY noise restrictions consultation: Please provide your input [here](#). The consultation is open until 29 July 2024.

Save the date!

The **[IATA World Sustainability Symposium](#)** will be held in **Miami, United States**, on **24 and 25 September 2024**.

The **[IATA Aviation Energy Forum](#)** will be held in **Kuala Lumpur, Malaysia**, from **12 to 14 November 2024**.



The FlyAware Environment & Sustainability Policy community has been created to provide an exclusive space for policy updates between IATA and IATA member airline staff. IATA documents and other valuable materials will be accessible securely within this invitation-only community. Please [click here to request access to FlyAware](#) and open the documents included in this newsletter. If you need any assistance, please contact us at flyaware@iata.org.

While we have tried to categorize the topics based on their geography of origin, some may have effects beyond their geography. If you have any questions or areas of specific interest on any of the topics listed above or other emerging issues, please contact us, and we will do our best to address them on the next call.

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