

**SUSTAINABLE AVIATION FUEL RECOMMENDATIONS
FOR BUSINESS AVIATION ACROSS EUROPE**

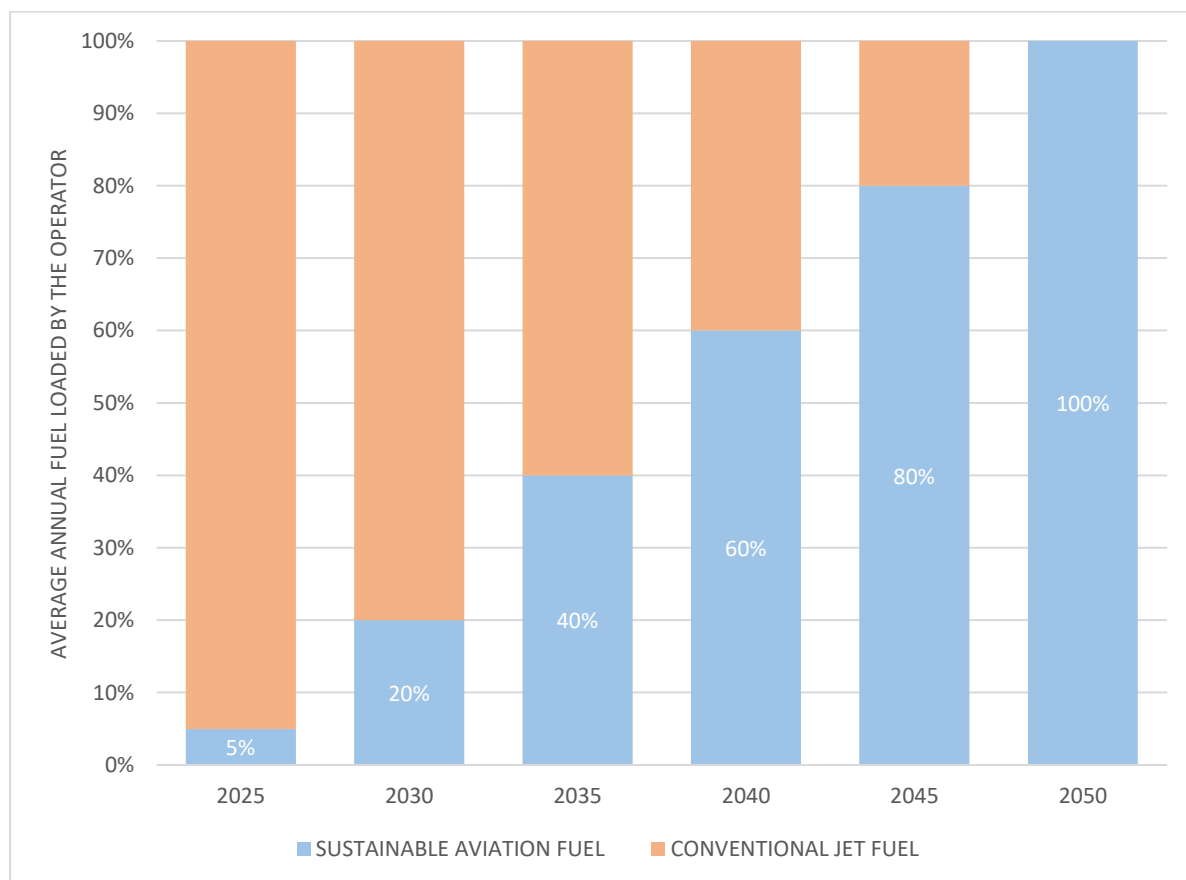
The purpose of this document is to set out a series of recommendations addressed to European Business aircraft operators calling for a general increased use of Sustainable Aviation Fuel (SAF) and, when SAF is not available, calling for SAF usage ramp-up through a robust and reliable Book & Claim system that allows for clear accounting and accountability. The document also offers suggestions addressed to European airports serving Business aircraft.

The overarching aim of these recommendations is to promote the widespread use of SAF throughout the European Business aviation sector, thereby eliminating any competitive bias among operators. Additionally, these recommendations seek to demonstrate that Business aviation is at the forefront of the transition towards achieving net-zero carbon emissions by 2050, if not earlier.

Recommendations

At business aircraft operator level, EBAA & GAMA recommend a progressive ramp-up of the incorporation of SAF on-board business aircraft. On a yearly average basis, we recommend that Business aircraft operators aim to meet the following minimum SAF ratio (regardless of any blending) and, should SAF not be physically available at certain airports, we recommend operators utilise a robust and reliable Book & Claim system to meet the below SAF ratio:

Minimum SAF to be loaded by operator per year:



These recommendations apply to any type of flight (whether domestic or international, whether private or commercial). They should be implemented independently of any other mechanism such as CORSIA or ETS for which SAF benefits should be claimed individually by the operator.

At airport level, EBAA & GAMA propose the following (based on an average of volume of activity figures from 2019):

- Prior to Q1 of 2025: EBAA & GAMA will actively work with the European business aviation airports listed below to facilitate the provision of SAF during normal operations to business aviation aircraft, aligning with the SAF volumes per year as set out therein. This collaboration is designed to facilitate the implementation of our business aircraft operator recommendations as set out above.

Minimum need for physical SAF per airport per year

Top Business Aviation Airports (Key Markets)			Need for SAF (in Tons) per year					
Country	Code	Name	From 2025 (5%)	From 2030 (20%)	From 2035 (40%)	From 2040 (60%)	From 2045 (80%)	From 2050 (100%)
FRANCE	LFPB	Paris Le Bourget	1.993	7.973	15.946	23.918	31.891	39.864
	LFMN	Nice Côte d'Azur	777	3.107	6.214	9.321	12.428	15.535
UNITED KINGDOM	EGGW	London Luton	1.887	7.548	15.096	22.645	30.193	37.741
	EGLF	Farnborough	1.619	6.478	12.955	19.433	25.910	32.388
	EGKB	London Biggin Hill	485	1.941	3.882	5.824	7.765	9.706
SWITZERLAND	LSGG	Geneva Cointrin	1.220	4.879	9.758	14.636	19.515	24.394
	LSZH	Zurich	815	3.261	6.522	9.783	13.044	16.305
SPAIN	LEMD	Madrid Barajas	563	2.250	4.501	6.751	9.002	11.252
GERMANY	EDDM	Munich	541	2.163	4.326	6.488	8.651	10.814
	EDDB	Berlin Schönefeld	392	1.569	3.139	4.708	6.278	7.847
ITALY	LIML	Milan Linate	533	2.132	4.264	6.395	8.527	10.659
	LIRA	Rome Ciampino	511	2.045	4.090	6.134	8.179	10.224
AUSTRIA	LOWW	Vienna Schwechat	432	1.729	3.459	5.188	6.918	8.647

NB: Figures are based on data from flight activities in 2019.

Figures shall be updated by EBAA on a yearly basis.

- EBAA & GAMA will actively work with all other European airports to facilitate a Book & Claim system for business aircraft operators to use in cases where SAF is not physically available. This suggestion is designed to facilitate the implementation of our business aircraft operator recommendations as set out above.

At regulatory level, EBAA & GAMA call on European and national level regulators to use the regulatory and non-regulatory tools at their disposal to facilitate a rapid and sustained rollout of SAF to the European market. Ramping up the availability of SAF in a sustained manner is the primary scope condition that will enable business aviation operators to deliver on their vision to reach net zero carbon emissions by 2050, as set out in the Business Aviation Commitment on Climate Change (BACCC).

Explanation

The global business aviation community has long been mindful of the need to mitigate its impacts on the environment. Indeed, renowned for its innovative and cutting-edge technologies, the sector has been at the forefront of developing more efficient and cleaner technological innovations, many of which have been taken-up by commercial airliners.

In 2009, the industry introduced the BACCC outlining its climate-action efforts through a combination of measures: technology, SAF, operational improvements and modernised infrastructure, and market-based measures such as offsetting. The BACCC was updated in 2021 to the ambitious goal of net-zero carbon emissions by 2050, and the BACCC was also reinforced in 2022 by the International Civil Aviation Organization (ICAO) as voted for by its 193 Member States at its triennial General Assembly. While our sector stands ready to deliver on its commitments, it has become clear that a drastic increase in SAF production and availability is urgently needed to enable us to do so.

At present, there are several obstacles that are hindering SAF uptake:

- SAF is only available at a very limited number of airports, in Europe and worldwide.
- Production remains very low.
- Operators tend to look at the cost of 100% neat SAF while they should consider the lower cost of a blend.

As a result, Business aircraft operators are facing challenges to incorporate SAF into their operations. These obstacles are particularly prevalent among those operators who prioritize their corporate policy and ESG / CSR criteria and/or those who seek to fulfill client demands.

Nevertheless, it is also worth noting that Business aviation operators requesting SAF are doing so with a preference for high levels of incorporation, usually with a blend of SAF at 30%. These levels exceed the mandates currently running in certain EU countries (for example, France has a 1% mandate since 2022) or those upcoming at the EU level under ReFuelEU (2% in 2025 with a progressive ramp-up until 70% by 2050). This commitment to higher SAF incorporation underscores the industry's willingness to go beyond regulatory requirements and demonstrates a real intention to reduce the carbon footprint of business aircraft operations.

EBAA & GAMA have set out these recommendations to align the various stakeholders involved in SAF operations so to facilitate SAF rollout within the upcoming years.