



Comments from the Advanced Biofuels Coalition (LSB) on the ReFuelEU Aviation Inception Impact Assessment IIA

The Advanced Biofuels Coalition (LSB) welcomes the opportunity to provide comments to the inception impact assessment on ReFuelEU Aviation and the promotion of sustainable aviation fuels (SAF) in the EU. LSB recognizes the need to reduce CO₂ emissions in all transport modes and therefore supports the intention to promote the use of sustainable aviation fuels.

LSB is a coalition of leading advanced biofuel technology developers and producers committed to making a significant contribution to meeting the EU ambitions of decarbonizing the transport sector. Sustainable advanced biofuels are a fast track solution for decarbonizing transport. Advanced biofuels bring multiple benefits in terms of CO₂ reduction, investments, revenues for farmers and forestry, improved waste management practices, job creation and an increase in energy security.

We understand the importance of obtaining a common approach on reducing emissions of air traffic at international level (ICAO). The EU should nevertheless set an example by promoting the use of SAF, which other jurisdictions could follow suit.

From our industry's experience with the Renewable Energy Directive (RED) we learnt that binding mandates for the use of alternative fuels are effective. A similar mandate for sustainable fuel used in air traffic seems promising. The measures chosen have to be easy to implement at Member State level. Building upon existing practice and experience in the REDII is strongly recommended.

LSB urges the Commission to set any support measures for SAF in addition to the existing REDII obligations for transport.

The SAF volumes that will be required will only be produced if there is a stable policy in place for at least a decade. Building new production facilities that use state-of-the-art technology are highly capital intensive from both an investment and operating standpoint. Those investments will only happen under a reliable policy framework.

Therefore, LSB underlines that quick and stringent implementation of the REDII in the member states is needed to enable both sustainable feedstock supply and technology development. Europe must lay the foundations now on which also future production of SAF volumes will build upon. Many of the plants currently under construction or under consideration to produce advanced biofuels for the road transport sector will be crucial in the coming decade to supply also fuels to the aviation sector.

LSB will provide further input to the Commission public consultation in due course.