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**Central policy-making
department**

Directorate for civil aviation
Sustainable aviation unit

P.O. Box 20901
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Our reference

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Date 12 June 2024
Subject Parallel claiming of renewable energy for aviation

Dear sir/madam,

The Minister of Infrastructure and Water Management has recently decided to allow parallel claims of renewable energy in aviation, by both fuel suppliers and aircraft operators. This means that an aircraft operator may use an “equivalent” proof of sustainability for its EU ETS reporting. This letter contains more information on this temporary national solution for the reporting year 2024.

Background

As part of the Fit for 55 package both ReFuelEU Aviation and a revision of the EU ETS took place. Within this framework, fuel suppliers and aircraft operators are supposed to be able to claim sustainable aviation fuels (SAF) in their respective systems. The European implementing regulation on monitoring and reporting¹ and the Dutch national regulation on emissions trading (Regeling handel in emissierechten) lay down the necessary requirements for an aircraft operator to claim under EU ETS.

The Netherlands has implemented the Renewable Energy Directive (RED-II) with an opt-in for aviation. When fuel suppliers supply SAF they can generate renewable energy units (HBEs) when a proof of sustainability (PoS) is presented to the Dutch Emissions Authority (NEa). Aircraft operators, when complying with the necessary monitoring and reporting requirements, can report zero emissions under EU ETS for the SAF they have used. From 2024 onwards, aircraft operators can also apply for free allowances (SAF allowances) for the usage of SAF. In order to do so, a PoS needs to be presented to the verifier and (if requested) to the NEa. In practice the PoS is already used by the fuel supplier to obtain its renewable energy units under the RED-II opt-in for aviation in the Netherlands. A PoS can only be issued once and is therefore not available to an aircraft operator for its EU ETS reporting.

Policy measure

The European Commission is developing a Union Database (UDB) which will provide a link between fuel consignments by fuel suppliers and fuel purchases by aircraft operators. The UDB is to be a reliable system supporting parallel claims of

¹ Implementing Regulation (EU) 2018/2066

renewable energy whilst simultaneously preventing double claiming in multiple greenhouse gas schemes by aircraft operators. However, this system will not be fully operable for the reporting year 2024.

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The increased uptake of SAF is necessary to meet Dutch policy goals for sustainable aviation. Therefore, it is desirable to remove barriers to an increased uptake. Over the past period, the Ministry and the NEa have worked together to come to a national solution. In anticipation of a fully working UDB this temporary national solution will allow for the parallel claiming of renewable energy by both the fuel supplier and aircraft operator.

Date
12 June 2024

Temporary solution

The temporary solution allows an "equivalent" PoS that can be used by an aircraft operator. This solution applies in the circumstances where a PoS is not available to an aircraft operator, necessitating the use of such an equivalent PoS. For fuel consignments in The Netherlands, the NEa registry will be changed to link these fuel consignments by fuel suppliers to purchases done by aircraft operators. The fuel supplier will have to provide the necessary information when booking its fuel consignment in the NEa registry. For fuel consignments outside The Netherlands, a PoS from national registries will be temporarily allowed. The temporary solution will be available from January 1st 2024 until December 31st 2024. When the UDB is fully operational the temporary national solution will be withdrawn. This solution is legally based on an adjustment of article 26 of the national regulation on emissions trading. The publication of the adjusted regulation can be found here: [wetten.nl - Regeling - Regeling handel in emissierechten - BWBR0032413 \(overheid.nl\)](https://wetten.nl - Regeling - Regeling handel in emissierechten - BWBR0032413 (overheid.nl))

Contact

The NEa will provide further information on the temporary solution on its website. To receive the aviation newsletter please email aviation@emissieautoriteit.nl. Specific questions on the reporting can be directed to the NEa helpdesk. T: +31(0)70-456 80 50 (every workday between 9.00 and 17.00h) E: info@emissieautoriteit.nl

If you have any additional policy-related questions based on this letter please get in touch with me.

Kind regards,

M. Roelofs
Policy Advisor