



— Nederlandse Emissieautoriteit  
— Dutch Emissions Authority

# Webinar on the 2025 reporting period for aircraft operators under ReFuelEU Aviation



# Today's speaker



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Senior Advisor Aviation, Team Aviation and  
Maritime

## Agenda

1. ReFuelEU Aviation obligations
2. Reflection 2024 reporting period
3. Compliance cycle & updates
4. Exemptions



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# 1. ReFuelEU Aviation obligations

# Recap: Aircraft Operator Obligations Under ReFuelEU Aviation

- **Refuelling Obligation (article 5):** Aircraft Operators must ensure that the yearly quantity of aviation fuel uplifted at a Union airport is at least 90% of the yearly aviation fuel required for their flights.
- **Reporting Obligation (article 8 & 9):** Aircraft Operators must submit verified annual ReFuelEU Aviation reports by March 31st for the previous calendar year. Reports must be submitted via EASA's sustainability portal and must be verified by independent third-party verifiers in accordance with EU ETS verification standards.
  - <https://sustainabilityportal.easa.europa.eu>

# 2025 Reporting Period: First year with penalties

- **Penalties for non-compliance:** Aircraft operators must comply with penalties for non-compliance. The Regulation establishes criteria for non-compliance penalties: penalties at least twice the yearly average price of conventional jet fuel per tonne, multiplied by the total yearly non-tanked quantity.
  - Implemented in the [wetten.nl](https://wetten.nl) - Regeling - Wet milieubeheer - BWBR0003245
  - *Last onder dwangsom* = an enforcement order requiring compliance, backed by a *penalty payment* (a fine imposed for non-compliance).
  - *Bestuurlijke boete* = an *administrative fine* imposed directly by the NEA for a violation
  - Use price as published in EASA's annual technical report for conventional jet fuel.



# List of Aircraft Operators 2025 reporting period

<b>NETHERLANDS</b>		
<i>CRCO Identification number</i>	<i>Operator Name</i>	<i>State of the Operator</i>
38397	ASL BV	NETHERLANDS
38494	CAVOK AIR	UKRAINE
6984	CHINA AIRLINES	TAIWAN
24134	CHINA SOUTHERN	CHINA
48817	CHINA SOUTHERN CARGO	CHINA
30777	CORENDON AIRLINES	TÜRKIYE
37301	CORENDON DUTCH AIRLINE B.V.	NETHERLANDS
1005	ELAL	ISRAEL
14846	EVA AIR	TAIWAN
44820	GEO SKY LLC	GEORGIA
28464	JET NETHERLANDS B.V.	NETHERLANDS
3735	KENYA AIRWAYS	KENYA
1640	KLM	NETHERLANDS
31329	LAN CARGO SA	CHILE
1801	MALAYSIA AIRLINES BERHAD	MALAYSIA
1833	MARTINAIR	NETHERLANDS
278	NIPPON CARGO	JAPAN
22139	POLAR AIR CARGO WW	UNITED STATES
2297	ROYAL JORDANIAN AIRLINES	JORDAN
29913	SUNSET AVIATION LLC (DBA SOLAIRUS AVIATION)	UNITED STATES
2723	TRANSAVIA AIRLINES	NETHERLANDS
30852	TUI NED. ARKEFLY	NETHERLANDS

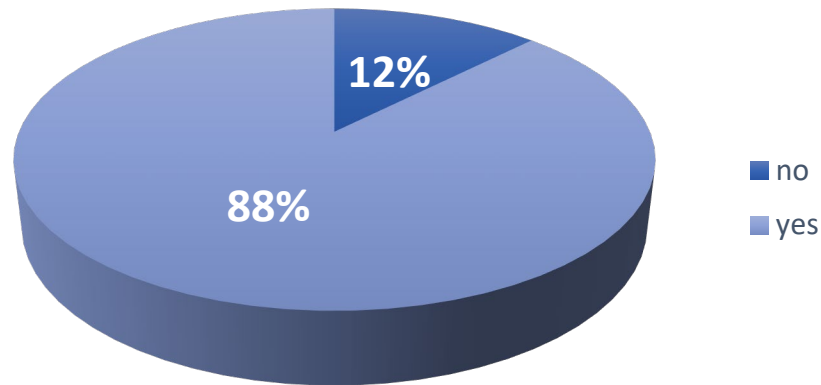
[List of aircraft operators \(2025 reporting period\) \(v.27 October 2025\)](#)



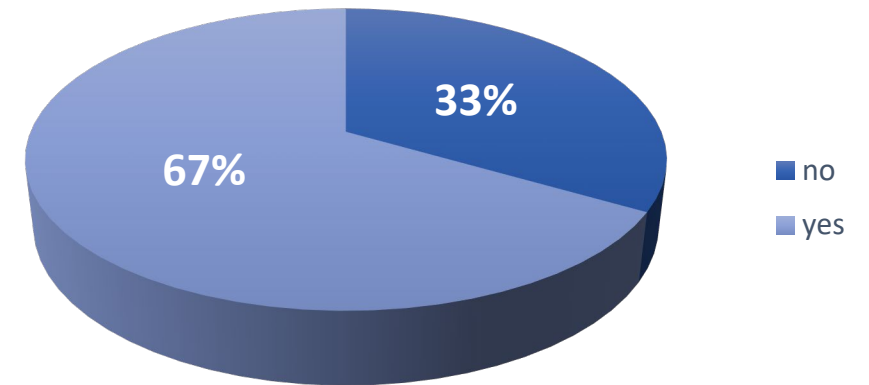
## 2. Reflection 2024 reporting period

# Reflection 2024 reporting period

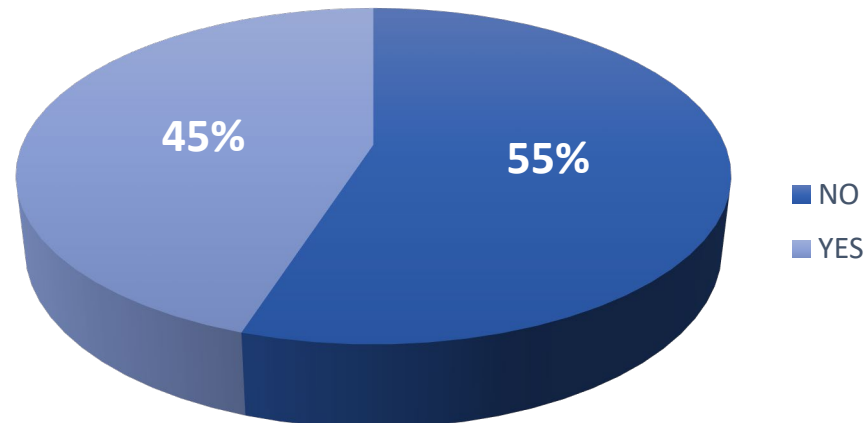
## Reporting obligation met



## Verification obligation met



## ReFuelling obligation met

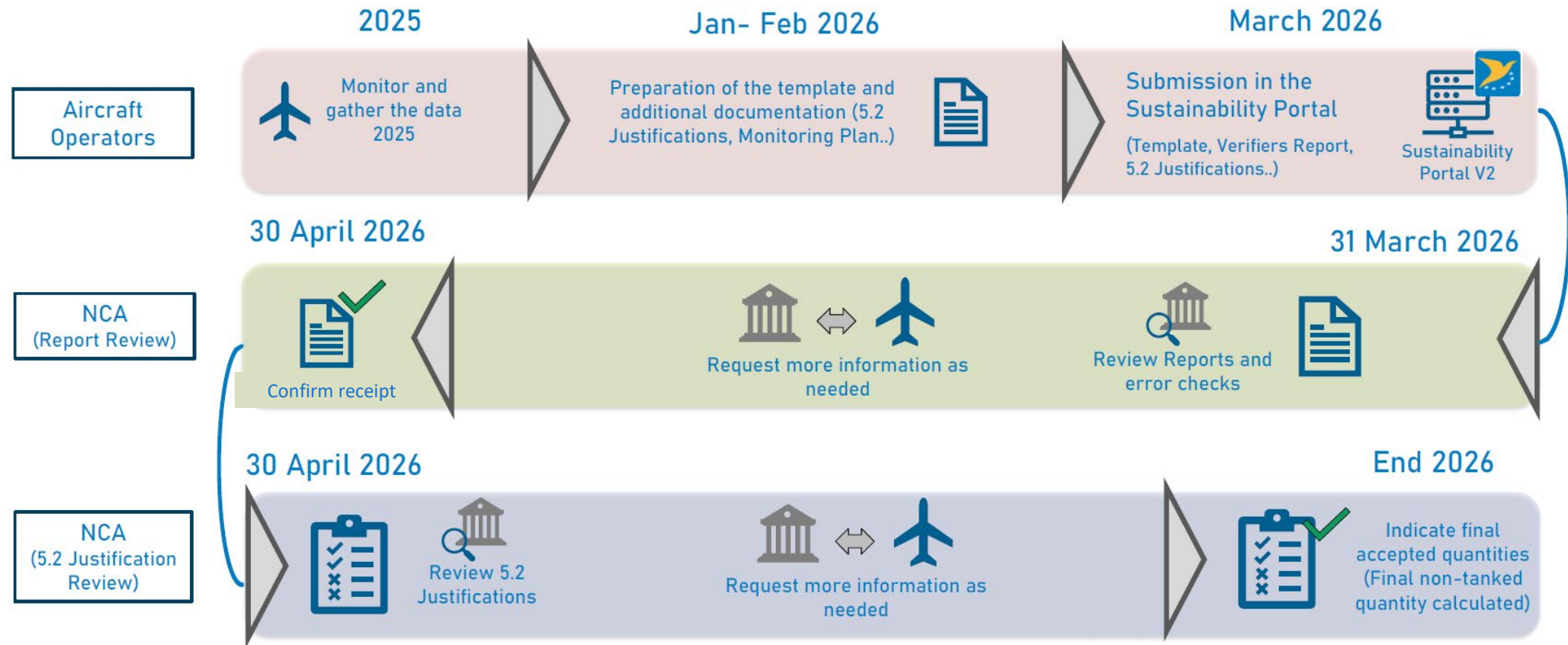


- Many verification comments related to data gaps



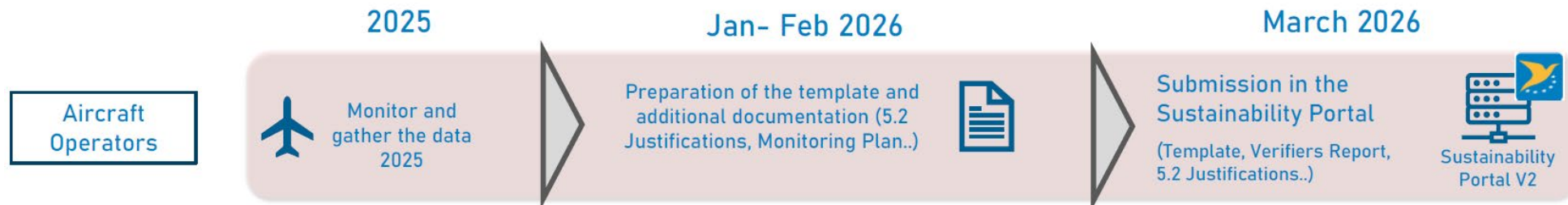
### 3. Compliance cycle & updates

# Compliance Cycle








# Updated guidance and tools for Aircraft Operators



## RESOURCES

-  Fuel Monitoring Tool (Aggregation of data)
-  AO Manual V2 **NEW**
-  AO Monitoring Plan **NEW**

## RECOMMENDATIONS

- ✓ Ensure access to the portal – if contact person changes please be sure to update
- ✓ Optional: Use fuel monitoring tool to aggregate data
- ✓ Optional: Use monitoring plan to track data collection proces

# Updated manual for Aircraft Operators and verifiers

Updates on:

- Data gaps and missing information
- Data sources
- Alternative calculation methods
- SAF reporting



**Manual for aircraft operators and  
verifiers V2**

# Data sources, data gaps and missing information specified

A	B	C	D	E	F	G	H
Union Airport Name	ICAO Code of Union Airport	Total flights operated departing from the Union Airport (N° flights)	Total flights hours operated departing from the Union Airport (N° hours)	Yearly aviation fuel required (tonnes)	Yearly actual aviation fuel uplifted (tonnes)	Yearly non-tanked quantity (tonnes)	Yearly tanked quantity for fuel safety rules (tonnes)
						0,00	
						0,00	

EASA defines 2 types of data entries:  
Sources and Alternative calculation

1. **Data gaps** (Col. A-G) → 5% of reportable flights
2. **Missing information** (Col. H) → 5% of arriving/departing flights

Tab	Column	Description	Source		Alternative calculation	Threshold
			Primary data source	Other secondary data source (upon agreement with the NCA)		
Tab 1. Fuel Reporting	Column A	Union Airport Name	Example in manual	Example in manual	N/A	5%
	Column B	ICAO Code of Union Airport			N/A	
	Column C	Total flights operated departing from the Union Airport			N/A	
	Column D	Total flights hours operated departing from the Union Airport			N/A	
	Column E	Yearly aviation fuel required			Alternative calculation	
	Column F	Yearly actual aviation fuel uplifted			Alternative calculation	
	Column G	Yearly non-tanked quantity			Calculated in template	
Column H	YTFJA (n-1)	Examples in manual	Examples in manual	Alternative calculation	5%	
	YTFJD (n)			Alternative calculation		
	Yearly fuel required (n-1)			Alternative calculation		
	AFC			Alternative calculation		

**Legend**

Sources
Data gaps
Missing information

**Data gaps:** These occur when information relevant to columns A–G of the reporting template is not available, and the AO uses alternative calculation methods, such as historical or statistical reconstruction.

**Missing information:** Refers to cases where information relevant to column H is not available, and the AO uses alternative calculation methods such as historical or statistical reconstruction

# Data sources

- **Primary data:** default process documentation used to record fuel data
  - Examples: Operational flight plans, internal flight management systems, measured via invoices, fuel slips or onboard systems
- **Secondary data:** other process documentation that can be used to record fuel data → if planning to use secondary data please notify the NEa (via MP or per email [aviation@emissieautoriteit.nl](mailto:aviation@emissieautoriteit.nl))
  - Examples: Technical logs, flight logs, or other relevant documentation, Eurocontrol CRCO bills, ETS support facility
- **Data gaps:** 5% threshold
  - If data gaps exceed 5% threshold please notify your verifier and the NEa via [aviation@emissieautoriteit.nl](mailto:aviation@emissieautoriteit.nl) with explanation of circumstances and justification for missing data.

# Updated SAF reporting tab

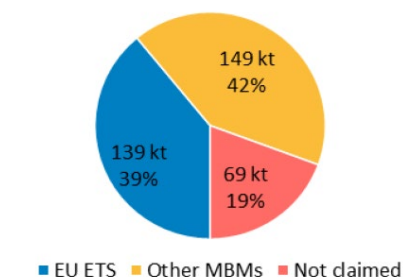
- Template aligned with template for aviation fuel suppliers under RFEUA
- Required to report SAF purchases during reporting period (from union airports)
- Additional market based measures added to the reporting template

New	New		New			
A	B	C	D	E	F	G
Union Airport Name	ICAO Code of Union Airport	Fuel Supplier	VAT Number of Aviation Fuel Supplier	Batch Number	Amount Purchased (tonnes)	Category of eligible fuel for use in aircraft

New		New				New	New		New
H	I	J	K	L	M	N	O	P	Q
Fuel conversion process	Feedstock name	Origin of feedstock (country)	Lifecycle emissions of the Eligible Fuel (gCO <sub>2</sub> eq/MJ)	Eligible Fuel (tonnes) claimed under EU ETS	Eligible Fuel (tonnes) claimed under CH ETS	Eligible Fuel (tonnes) claimed under UK ETS	Eligible Fuel (tonnes) claimed under CORSIA	Eligible Fuel (tonnes) claimed under other MBMs	Eligible Fuel (tonnes) not claimed

81% of SAF reported was claimed in an MBM scheme

SAF claim by MBM scheme



# Falling Below the 90% Refuelling Threshold

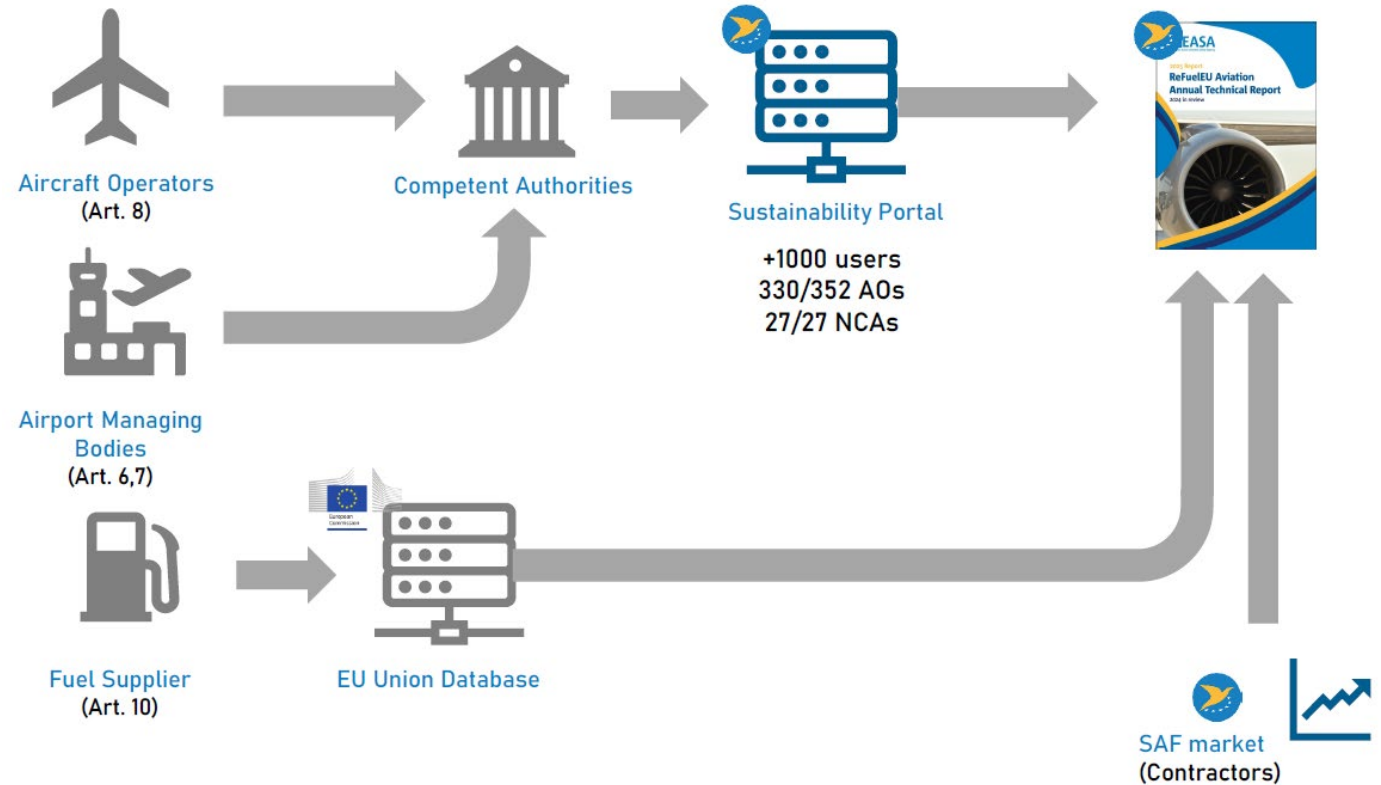
- **Article 5.2:** Justifications for reasons of compliance with applicable fuel safety rules
  - Justified in column H of the annual ReFuelEU Aviation report: Yearly tanked quantity for fuel safety rules (tonnes) with the calculation formula in the template → *may use fuel monitoring tool to help calculate*
  - Coordination between competent authorities Union airports and NEa where AO has non-tanked quantities
  - Based on operational flight plans, competent authorities may request additional documentation beyond the calculation in column H
  - Penalties determined by the NEa by the end of 2026

# Falling Below the 90% Refuelling Threshold

- **Article 5.3:** Temporary exemptions for flights on a specific existing or new route of less than 850 kilometres, or 1 200 kilometres for routes connecting with airports situated on islands without rail or road connections, departing from a Union airport
  - Requested at least three months before the envisaged date of application of the exemption in the Sustainability portal
  - Competent authority of the union airport evaluates exemption and rejects or approves in the portal

# Key takeaways

- First reporting year with possible penalties
- New guidance and templates
- Check data gaps and notify the NEa and verifier





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