Commissioner Wopke HOEKSTRA

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Commissioner Apostolos TZITZIKOSTAS

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Cc

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Brussels, 29 October 2025 By e-mail

Subject: Inclusion of Book & Claim and Sustainable Aviation Fuels allowances as part of STIP

Dear Commissioners Hoekstra and Tzitzikostas,

We, the undersigned associations, who jointly represent the European and U.S. aviation ecosystems, are writing to reiterate the messages set out in our *Joint Industry Letter on Sustainable Aviation Fuels and Book & Claim* of 17 February 2025, co-signed by aerospace manufacturers, global aircraft operators (passenger and cargo), airport regions, airports, express delivery companies, fuel producers and logistics service providers, ahead of the Sustainable Transport Investment Plan (STIP) publication next week.

Scaling the production and use of Sustainable Aviation Fuels (SAF) remains essential to achieve climate goals while safeguarding competitiveness. The first months of SAF mandates have demonstrated that the system needs additional flexibility for offtakers to stimulate the SAF market. Current regulatory and market constraints are slowing down investment and deployment. We ask that the STIP explicitly supports the introduction of a **Book & Claim (B&C)** system and commits to ensuring it is compatible with the EU Emissions Trading System (EU ETS) as part of its ongoing review. We also call on the STIP to channel EU ETS revenues towards financing SAF production and uptake, and to provide clear political direction on increasing and extending SAF allowances beyond 2030 and adapting the distribution mechanism to support multi-year off take agreements to accelerate the sector's decarbonisation.

In particular, we call on the Commission to:

- Include Book & Claim in the STIP implementation to enable SAF distribution and uptake across all EU airports, regardless of physical availability.
- Allow purchase-based claiming of SAF under EU ETS through necessary targeted amendments
 to the EU ETS, enabling aircraft operators to reduce their EU ETS obligations under the applicable
 scope by claiming the use of SAF from all Union Airports.

- Extend to aircraft operators the flexibility mechanism applicable to fuel suppliers under ReFuelEU Aviation.
- Enable investment in EU SAF projects via book-and-claim, with all transactions digitally traceable and registered in the Union Database for Biofuels (UDB) to ensure transparency and prevent double counting.
- Include in the STIP a political direction on increasing and extending SAF allowances.

Introducing Book & Claim now is crucial to avoid market distortions, accelerate SAF deployment, and deliver on climate and competitiveness ambitions. The forthcoming STIP is also a key opportunity to mobilise public and private funding to bridge the price gap for airlines, including through the recycling of EU ETS revenues to finance SAF production and uptake, and by providing political direction on increasing and extending SAF allowances well beyond 2030 and allowing for multi-year off takes. Together, these measures will enable the industry to competitively decarbonise, strengthen our strategic autonomy, and turn sustainable aviation into an economic success story.

Yours sincerely,

















