

March 4, 2021

Mr. Salvatore Sciacchitano, Council President
Council Members
International Civil Aviation Organization
999 Robert-Bourassa Boulevard, Montréal, Québec H3C 5H7, Canada

Dear President Sciacchitano and Council Members:

COVID-19 has brought civil aviation to an inflection point. A precipitous drop in passenger demand has thrown a cloud over the future of passenger aviation. At the same time, new science underscores the scale of aviation's role in changing the climate. These developments present an enormous challenge for the industry. But they also open an opportunity to chart a path forward for civil aviation to embrace the imperative of a net-zero climate impact by 2050.

One key step on that path is an acceleration of high quality sustainable aviation fuel (SAF) use. SAF can be produced using a variety of renewable sources and waste feedstocks and provides a distinct opportunity for aviation to decarbonize rapidly and permanently – but only if the SAF actually reduces emissions, meets a high standard of environmental integrity to ensure that it does not hurt ecosystems or local communities and is transparently and accurately accounted for.

As Council prepares to reflect on the results of the State Letter consultation with Member States on amendments to the ICAO document “CORSIA Sustainability Criteria for CORSIA Eligible Fuels”, Council should bear in mind that a comprehensive set of sustainability criteria for SAF is a critical component of the CORSIA SAF framework. The additional sustainability criteria will ensure CORSIA SAF (1) promotes rather than undermines the achievement of the UN Sustainable Development Goals and (2) mitigates the emissions, ecosystem and community risks otherwise present in alternative fuel production and use.

Adoption of the additional criteria now rather than by the end of the pilot phase in 2023 will provide certainty to SAF producers and airlines, as they make investments in the sustainability of their supply chains. **Postponing the adoption of the sustainability criteria poses the risk of delaying investments in SAF production capacity.**

ICSA acknowledges and welcomes the efforts made by the ICAO Council and CAEP in developing and enhancing the list of sustainability criteria and urges Council to adopt it as originally recommended by CAEP without further changes. The full list of sustainability criteria is the result of extensive technical discussions spanning more than a decade. There is no need to further delay the adoption of the sustainability criteria as any potential targeted amendments can be adopted in the future with the technical assistance of CAEP.

ICAO Council 222nd session presents a unique but rapidly fleeting opportunity for Council to send a clear signal on its commitment to a sustainable future. Council has the opportunity to act now and adopt the sustainability criteria that will deliver the certainty fuel producers need to plan SAF production investments.

Sincerely,

The International Coalition for Sustainable Aviation.

About ICSA:

The International Coalition for Sustainable Aviation (ICSA) works to reduce pollution from air travel. As a network of nonprofit organizations representing millions of members, ICSA is the only environmental civil society group accredited as an observer by the International Civil Aviation Organization (ICAO), the United Nations standard-setting body for international air travel. ICSA member organizations include Aviation Environment Federation, Carbon Market Watch, Environmental Defense Fund, the International Council on Clean Transportation, Transport & Environment, and WWF. For more information, please visit www.icsa-aviation.org.