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e-SAF: unlocking Final investment decisions in Europe



France Hydrogène

Engagée pour la transition écologique

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e-SAF: unlocking Final investment decisions in Europe

Completing and securing the regulatory framework to turn Europe's project pipeline into production capacity

Executive Summary

Europe has entered the decisive phase of building its e-SAF sector. ReFuelEU Aviation has created a predictable market for e-fuels and enabled the emergence of a significant industrial pipeline. The challenge is no longer to create demand, but to convert this regulatory visibility into final investment decisions (FIDs) and European production capacities.

The necessary capacities exist. In 2026, 54 projects represent around **3.3 Mt/year of potential capacity by 2035**, which is more than the needs induced by ReFuelEU Aviation. The main challenge lies in timing: around 0.3 Mt of projects are currently close to reaching FID compared to a need of around 0.55 Mt/year in 2030, to which are added 0.74 Mt of advanced projects likely to contribute to the achievement of the objectives from 2031. The risk is therefore that of a **delay in the ramp-up of production during the first two years, not a structural supply deficit**.

More than half of the European planned production capacity is concentrated in countries with already decarbonised electricity mixes, in particular France, Finland and Sweden. In these electricity systems, production is inherently hybrid: the same project can produce both RFNBO and *non-fossil synthetic aviation fuels*, which ReFuelEU Aviation counts as equivalent in its e-SAF sub-quota. **The achievement of European objectives therefore depends directly on the ability to ensure regulatory coherence for these hybrid productions**; any unfair treatment between RFNBO and non-fossil fuels would create an undue market distortion and related uncertainty on projects, and ultimately penalise the entire European e-SAF sector by threatening the achievement of the Union's objectives.

The mechanisms needed to bridge this initial gap are now taking shape. The first long-term purchase contracts are signed and the **double-sided auction mechanisms (DSAs),** making it possible to reconcile the need for long-term commitment of producers with the shorter purchasing horizons of consumers, are being put in place within the Union. France is preparing to play a central role in this catch-up: France's 2027 Finance Bill provides for a mechanism that can carry up to **160 kt of e-SAF (equivalent to the French mandate of 2% of e-SAF by 2032):** this mechanism should therefore directly trigger FIDs on the first two major projects, but also constitutes Europe's first large-scale DSA proposal; by adopting certain design principles of the French DSA, the other States of the Union will be able to position themselves on such volumes, consistent with the regulations.

In this context, weakening the e-SAF sub-quota on the grounds of a supposed supply deficit would create a self-fulfilling prophecy, by degrading precisely the regulatory signal on which FIDs are based. The European priority must be to secure investments around three principles.

1. **Preserve the integrity of ReFuelEU Aviation, while absorbing the initial delay.** This implies that the Commission publishes its report on ReFuel without delay to restore the predictability essential to investments, and that it includes a proposal for a multi-year gap account for 2030-2034 to temporarily smooth compliance with the blending mandates, without changing the cumulative ambition: the volumes missing at the beginning of the period will have to be fully made up before its closure. This proposal must not involve reopening the ReFuel regulation (guidance to States), or in a very targeted way, only by adding an article.
   At the same time, the sub-quota must remain reserved for fuels that meet its industrial logic: **eHEFA must not be able to be counted as e-SAF**, at the risk of diverting the investment signal intended for synthetic fuels.

2. **Make European instruments a lever for building a European industrial base.** In the revision of the EU ETS, **SAF allowances must remain reserved for fuels produced in Europe**. In order to speed up purchase commitments and facilitate the deployment of DSAs, the *book-in-advance* mechanism must be strengthened, reserving at least **30 million SAF allowances** and firm contracts of at least **five years**.

3. **Treat all e-SAFs recognised by ReFuelEU Aviation fairly.** RFNBO and synthetic non-fossil fuels contribute to the same sub-quota and are two complementary pathways in the same sector. It is now imperative to ensure regulatory coherence by ensuring fair treatment in the other instruments that complement ReFuelEU Aviation: **the same coverage rate by SAF allowances** in the EU ETS and requiring non-fossil e-SAF to be counted towards Member States' clean energy targets under RED IV.

Europe now has the projects and assets needed to build a new industrial sector that strengthens its energy sovereignty and reduces its aviation sector's dependence on imported fossil fuels.

It is now up to the Commission and the European co-legislators, through the decisions they make in the coming months, to turn this industrial potential into reality.

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Introduction — From regulatory predictability to industrial implementation

e-SAF will be essential to decarbonising aviation as sustainably available biomass becomes increasingly limited. Their development is now also a sovereignty issue. In a geopolitical environment marked by the crises in Hormuz and Bab-el-Mandeb, Europe's ability to control a growing share of the production of its aviation fuels is becoming a direct question of security of supply.

The Fit for 55 package laid a crucial foundation. ReFuelEU Aviation gives producers the market visibility essential for investments by setting a binding trajectory for the incorporation of SAF and a specific sub-quota for synthetic fuels from 2030. This stability has enabled the emergence of a significant European industrial pipeline.

The challenge has therefore shifted: it is no longer a question of creating demand, but of converting this regulatory demand into final investment decisions, and then into production capacities. It is on this condition that Europe will be able to make e-SAF a simultaneous lever for decarbonisation, industrialisation and energy sovereignty.

The evidence: Europe's e-SAF production capacities is within reach

A European pipeline compatible with the ReFuelEU Aviation mandates

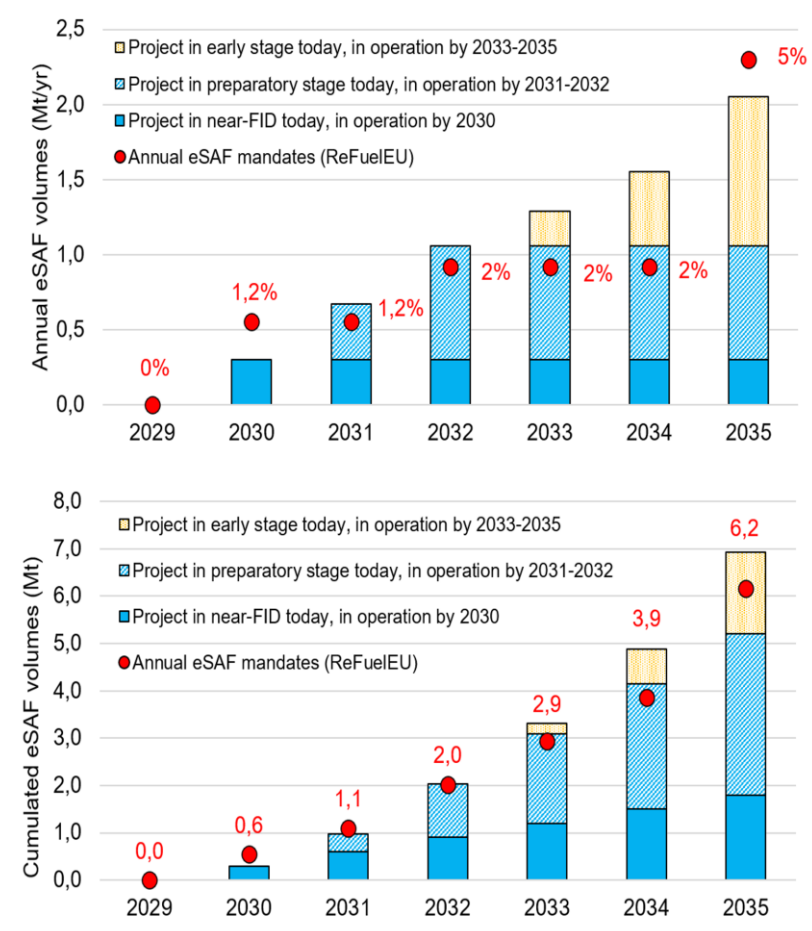


FIGURE 1: ANNUAL (LEFT) AND CUMULATED (RIGHT) ESAF PRODUCTION AND MANDATES VOLUMES, BASED ON HYDROGEN EUROPE ESAF REPORT ; PRODUCTION VOLUMES RAMP-UP FOR PROJECTS IN "PREPATORY STAGE" : 50% FOR 2031, 100% FROM 2032 ; PRODUCTION VOLUMES RAMP-UP FOR PROJECTS IN "EARLY STAGE": 15% IN 2033, 30% IN 2034, 60% IN 2035 VOLUMES CONSIDERED FOR 2031 ; 100% PRODUCTION VOLUMES ARE CONSIDERED FOR PROJECTS IN "NEAR-FID" STAGE ; EU KEROSENE CONSUMPTION: 46 MT ;

In 2026, Hydrogen Europe identified 54 e-SAF projects representing 3.3 million tonnes (Mt) of annual production capacity by 2035. These volumes far exceed the needs corresponding to European quotas.

The main challenge lies in timing. About 0.3 Mt of projects are currently close to reaching FID, while the 2030 mandate represents about 0.55 Mt/year. In addition to these volumes, 0.74 Mt of projects at an advanced stage of development are likely to contribute as early as 2031 if investment decisions are made quickly. The short-term risk is therefore a delay in commissioning, not a structural lack of projects.

The initial delay does not reflect a structural capacity shortage; and double-sided auction mechanisms are being put in place to bring these production capacities online (focus on the French DSA)

The first major sales contracts have been signed, bringing the production projects closer to FID and the start of construction: Uniper signed a 40 kt/year purchase agreement with Arcadia eFuels for more than ten years for

the Endor project (Denmark) on 25 September 2026, with an FID expected in early 2027 for deliveries from the early 2030s.

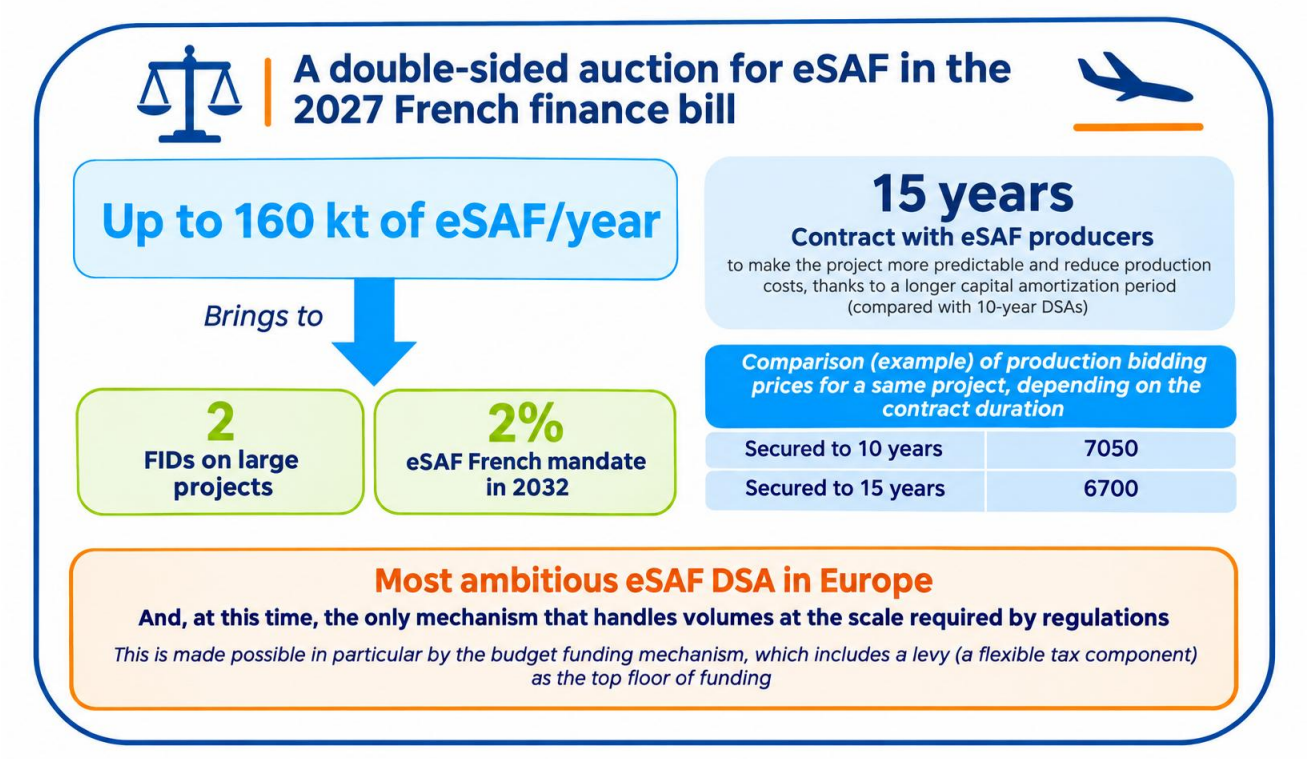
Above all, the last instruments needed to complete ReFuelEU Aviation and trigger FIDs are being put in place. Double-sided auction mechanisms (DSAs) reconcile producers' needs for long-term commitment with consumers' shorter purchasing horizons. The European Early-Movers Coalition is planning the deployment of the first DSAs to provide producers with the long-term visibility necessary for investment.

With its draft 2027 Finance Bill, France is positioning itself as a European frontrunner by proposing the first large-scale double-sided auction mechanism for e-SAF, covering up to 160 kt per year. This volume would be sufficient to meet France's 2% e-SAF mandate by 2032 and should play a central role in bridging the initial supply gap. The mechanism is expected to unlock FIDs for the first two major production projects.

The ability to make the DSA cover such volumes, with regard to the mechanism as envisaged in Germany (a €2 billion budget allocation for 30 kilotons of e-SAF), stems from a simple observation: a double auction should only compensate for the price difference between the production-side and demand-side auction. Thanks to the specific market value created by the ReFuelEU Aviation e-SAF sub-mandate, a DSA does not need to cover the entire price difference between e-SAF and conventional jet fuel. Instead, it only needs to cover the difference between the long-term purchase price guaranteed to producers and the successive resale prices obtained through demand-side auctions over the contract period: this significantly increases the mechanism's leverage.

The theoretical maximum sums at stake can nevertheless be significant, and difficult for the State to provision: this is why France plans to finance this delta from a tax contribution based on fuel suppliers, in a similar way to the choice made by the United Kingdom for the financing of its CfD on sustainable aviation fuels *[note: the modular tax contribution makes it possible to launch schemes on the required scale; this does not exclude a first stage of non-tax financing, for example by recycling a share of ETS Aviation revenues].*

If retained in the final version of the Finance Bill (after parliamentary examination), this "scaled" DSA design should lead to others in Europe (or a correction of the design of the DSAs being launched by pioneer countries, such as Germany, in order to cover adequate volumes).

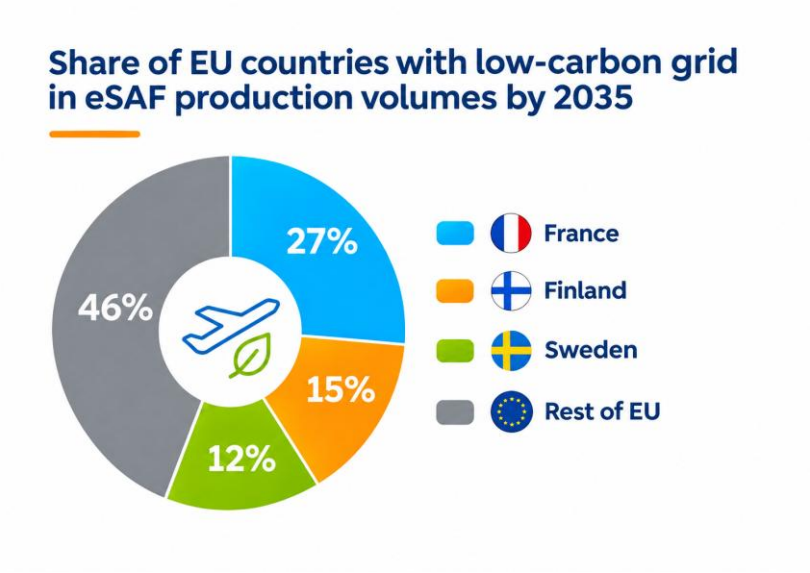


The expected initial delay does not therefore reflect a structural inadequacy of supply: the projects exist and the mechanisms needed to bring them to FID are being deployed. **Provided that the regulatory and economic parameters on which these mechanisms were built are preserved, the volumes they must trigger will make it possible to quickly make up for the initial delay.** Conversely, calling into question the e-SAF mandate or the value associated with achieving it would directly degrade the economics of the DSAs at the very moment when they have to convert the European pipeline into production capacity.

European e-SAF capacity concentrated in countries with already decarbonised electricity mixes

An e-SAF unit needs a stable supply of hydrogen. Given the capital intensity of electrolysers and synthesis units, their economic viability also depends on high capacity factors. Catalytic processes, exchangers and distillation units are designed to operate with as continuous supplies as possible; greater operational flexibility requires storage capacity, equipment oversizing and higher operating costs.

Some areas with abundant renewable energy resources, particularly in the Iberian Peninsula, can meet these conditions. The conditions are all the more favourable in bidding zones where the electricity mix is already very decarbonised, such as France, Finland and Sweden. This explains the concentration of European e-SAF projects in these areas.



France, Finland and Sweden account for more than 50% of Europe's planned e-SAF production capacity

Hybrid production by design

In these electricity systems, the same electrolyzer can produce a share of hydrogen qualified as RFNBO and a share of low-carbon/non-fossil electrolytic hydrogen. The same logic is found in the fuels produced downstream: e-SAF RFNBO and non-fossil synthetic aviation fuels. ReFuelEU Aviation accounts for both in the same way in its e-SAF sub-quota.

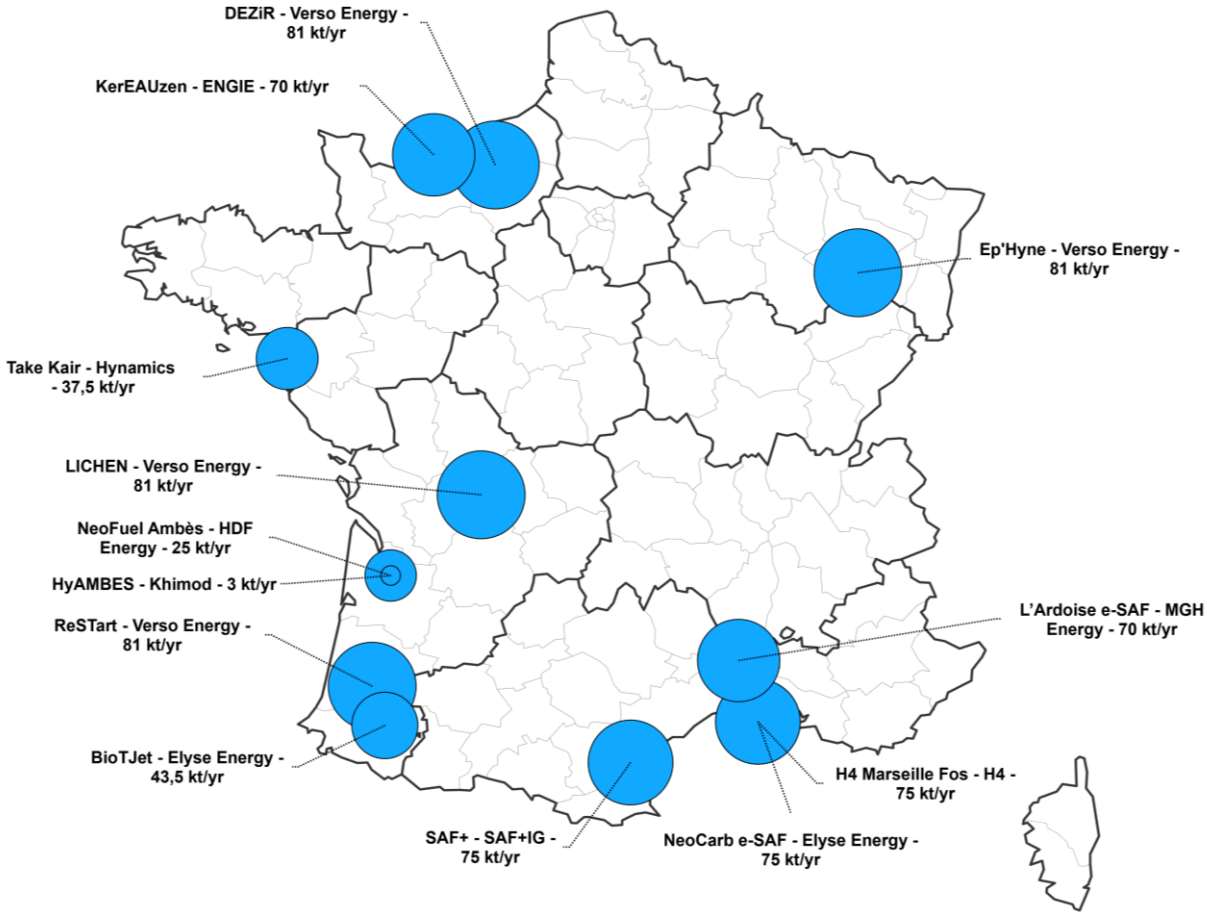
There is therefore no European capacity problem per se. On the other hand, artificially creating uncertainty about projects located in countries with decarbonised electricity mixes – precisely those that combine RFNBO and non-fossil synthetic fuels – would create a real capacity problem by blocking the most advanced projects.

These countries are also characterised by access to concentrated sources of biogenic CO2. In the context of the revision of the EU-ETS, and in particular the introduction of a mechanism to reward negative emissions, it

appears necessary to ensure that producers of synthetic molecules as well as current users of CO2 will retain access to this biogenic carbon. Securing access to CO_2, a key prerequisite for the competitiveness of European synthetic molecule projects, must also involve the development of an integrated CO_2 infrastructure strategy and the implementation of traceability mechanisms.

France: a strategic project pipeline serving the European market

France has the largest portfolio of e-SAF projects in Europe: 13 projects totalling nearly 800 kt e-SAF/year by 2035, with the first major projects able to be commissioned as early as 2030-2031 and an acceleration from 2032. This positioning is based on carbon-free electricity, sources of biogenic CO_2, airport and kerosene transport infrastructure, as well as industrial know-how covering the main technological building blocks.



The contribution of these projects should not be assessed solely in terms of French demand. They are intended to supply the European market created by ReFuelEU Aviation. In the first years of the mandate, a regular and predictable supply from a few industrial basins will be decisive in securing the achievement of the objectives at EU level.

The diagnosis is clear: Europe has a robust pipeline of industrial projects capable of delivering the required production capacity. Weakening ReFuelEU Aviation on the grounds of a supposed supply deficit would create a self-fulfilling prophecy by degrading precisely the regulatory signal on which the FIDs are based. An implementation adjustment can absorb the initial delay; there is no need to reduce the value of the e-SAF quota or to facilitate its attainment by integrating fuels that do not meet its industrial logic.

Recommendation 1 — Preserving the integrity of mandates

ReFuelEU Aviation: absorbing the initial delay without reopening the mandates

The likely lag between the regulatory trajectory and the first commissioning must be treated as a problem of timing. A reduction in quotas would weaken the long-term demand signal at the very time when projects need to secure their financing.

A *multi-year compliance balancing mechanism* would give temporary flexibility to fuel suppliers when a supply shortfall prevents the achievement of the 2030-2031 objectives, while fully maintaining the cumulative ambition. Over a five-year period, the volumes not incorporated at the beginning of the period should be caught up before its closure. The annual penalty would not apply as long as the supplier remains in the planned corridor and makes up for its cumulative shortfall by the end of the period. In concrete terms, if the obligated party falls below the lower corridor over a year of the *period*: it must then pay the full penalties due over the period, i.e. the difference with the ReFuelEU Aviation regulation (i.e. for the current year and previous years); as provided for by the regulation, payment of these penalties does not release suppliers from their compliance obligations.

We are therefore creating a tool for pragmatically achieving the target by partially shifting from annual compliance to a cumulative volume-based approach, over a period to be defined; but without harming the strength of the regulation, which will continue to apply in full in the event of an overrun of flexibility.

France Hydrogène's recommendation (for the European Commission) —

- Publish the report on the ReFuelEU Aviation regulation by the end of February 2027 at the latest: the legal obligation was for the end of 2026, and neither manufacturers nor States setting up DSAs or equivalent mechanisms can reasonably move forward without clear assurances regarding the long-term stability of the e-SAF sub-mandate
- In this report, provide guidance to Member States on the application of the ReFuelEU Aviation penalties, by authorising the establishment of a multi-year gap account to temporarily smooth the incorporation of e-SAFs without changing the cumulative volumes induced by the application of the ReFuelEU Regulation. The Commission will determine in this guidance the upper and lower boundaries of the compliance corridor for each year of obligation, as well as the possible smoothing period. We recommend the following design elements:
  - The 1st smoothing period must be 2030-2034;
  - Over the years 2030-2031, the lower corridor (i.e. the minimum cumulative volumes to avoid paying penalties) must not be zero, but must be at a level that takes into account the slight delay in the commissioning of capacities;
  - In 2034, i.e. the end of the five-year period, the lower corridor must once again be equal to the cumulative volumes induced by the ReFuel mandates (otherwise, flexibility at the start would be equivalent to a shift in ambition, unjustified in view of the industrial capacities available);
  - In 2034, the upper corridor must be made much higher (in terms of the cumulative volumes expected by the regulation) than in other years, in order to leave the possibility of preparing the significant increase in the mandate scheduled for 2035 (from an e-SAF sub-mandate of 2 to 5%).
- If it is considered that the guidance for national decrees implementing penalties would not work, announce in the report that it would provide for this same mechanism by adding a targeted article that would not lead to the reopening of the other articles of the ReFuelEU Aviation regulation (a wider reopening would threaten the overall architecture of the regulation).

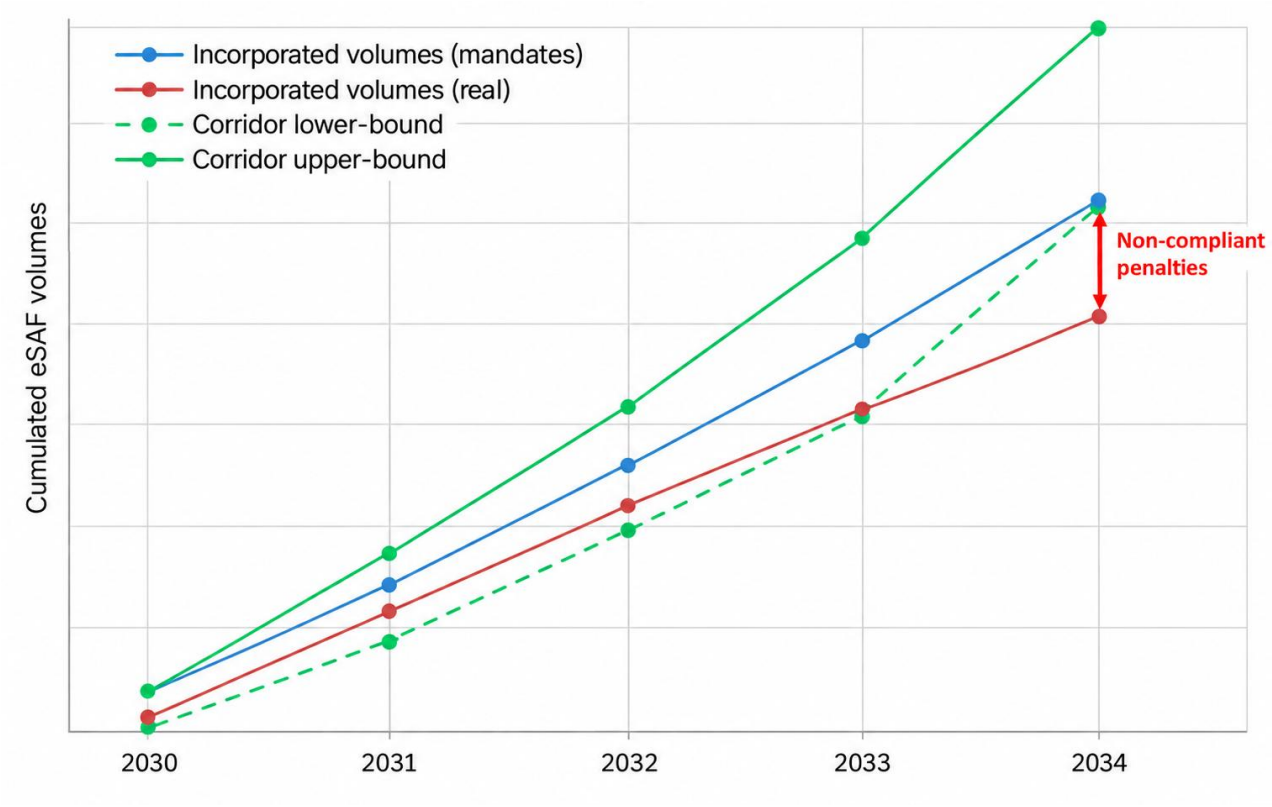


Illustration of the multi-year compliance balancing mechanism

In this example, the possible shortfall of the supply in 2030-2031 with regard to the ReFuel mandate does not immediately trigger penalties thanks to the lower limit of the corridor. On the other hand, while this lower corridor returns to the level of the ReFuel mandate (in cumulative view) for the year 2034, we can see in our example that the obligated fuel supplier falls below the lower compliance threshold: the penalties then apply.

At the end of the period (here five-year), we expect a convergence of the lower corridor with the cumulative volumes of the strict ReFuel mandate. And we preserve an upper corridor so that obligated parties can effectively prepare for the step-up in the mandate from 2% to 5% in 2035.

RFNBO Delegated Acts: Preventing eHEFA from diverting the e-SAF sub-quota

The use of electrolytic hydrogen in HEFA processes can reduce the climate footprint of biofuel refining. **This contribution is already valued, rightly, in the transport target of the RED via Article 25 (hydrogen sub-obligation which must imperatively be preserved in the 4th Renewable Energy Directive).**

Conversely, it is clear that electrolytic hydrogen used in a HEFA process does not meet the specific purpose of the e-SAF sub-quota provided for in the ReFuelEU Aviation Regulation: to prepare for the decarbonisation of aviation beyond the sustainably available volumes of biomass.

To qualify eHEFA as e-SAF would, on the contrary, link electrolysers to biomass-dependent assets with limited sustainable biomass resources that can create new external dependencies. This would dilute the investment signal for synthetic fuels produced from electrolytic hydrogen and non-fossil carbon.

Such a qualification would cannibalize 20 to 50% of the sovereign e-SAF production volumes in Europe[1] corresponding to the first 2030-2031 mandate (1.2%); above all, it would create a significant additional uncertainty for investment in the first e-SAF production projects, which would be exploited by some actors to continue their more general offensive on the e-SAF mandate of ReFuelEU Aviation.

[1] Source : Why allowing "e-HEFA" to count towards the ReFuelEU e-SAF mandate would be a strategic mistake, T&E, 2026

France Hydrogène's recommendation – clarify, in the targeted revision of the RFNBO delegated acts, that eHEFA cannot be counted as e-SAF under the ReFuelEU Aviation sub-quota, similar to the clarification in the delegated act defining low-carbon fuels.

Recommendation 2 – Prioritise a European production base (EU-ETS – Article 3c)

SAF allowances: reserving support for European production

European public support must contribute to the emergence of industrial capacity located in Europe. In the revision of the EU ETS for 2031-2040, the Commission's proposal reserves SAF allowances for European production. This approach is consistent with the dual objective of e-SAF deployment: to decarbonize aviation while reducing European exposure to fuel imports and geopolitical shocks on supply routes.

France Hydrogène's recommendation — keep in the revision of the EU ETS the reservation of SAF allowances for fuels produced in Europe.

SAF allowances: strengthening incentives for "early" medium and long-term e-SAF offtake agreements

The Commission's proposal foresees the reservation of up to 10 million SAF allowances for fuel volumes covered by firm supply contracts of at least 3 years, for a period of up to 5 years. **This incentive for airlines to enter into longer-term offtake agreements is decisive to maintain the integrity of the RefuelEU Aviation framework; however, given its importance, the proposed allocation (cap of 10 million allowances) remains significantly insufficient**.

In addition, the minimum duration of 3 years for firm supply is insufficient to meet the financing requirements of e-SAF production projects ahead of FID. Similarly, double-sided auction mechanisms are being set up in Europe. The main challenge for public authorities lies in financing the potential price differential if, during the life of the production project (which is guaranteed a purchase price over 10 to 15 years), the resale price to fuel suppliers or airlines falls below the guaranteed price to the producer. Encouraging the consumer side of the double-sided auction to commit to a relatively long period (via the reservation of SAF allowances) would significantly limit the financial risk for the public authorities. And thus facilitate the large-scale deployment of double-sided auction mechanisms in Europe, in order to achieve the objectives of the ReFuelEU Aviation Regulation.

France Hydrogène's recommendation — Increase the share of SAF allowances intended for the book-in-advance mechanism to at least 30 million.
Increase the minimum duration of firm supply contracts eligible for the book-in-advance mechanism to 5 years; assess the benefits of extending this minimum duration beyond 5 years.

Recommendation 3 — Ensure equal treatment of all e-SAF pathways recognized under ReFuelEU Aviation (renewable and non-fossil)

ReFuelEU Aviation already recognises the complementarity between RFNBO and *non-fossil synthetic aviation fuels* ('LCFNBO'): both categories contribute to the same e-SAF sub-quota. This logic is consistent with the evolution of the European framework, which tends to jointly recognize renewable and low-carbon electrolytic fuels in STIP and *EU Accelerate* communications, in the options examined for RED IV, as well as with the recognition of the role of nuclear assets alongside renewables in the State of the Union 2026.

All the support instruments and the regulatory framework must now be aligned with this reality. Artificially restricting support to RFNBO-only production facilities would reduce the number of projects that can be financed in the areas where the projects are currently the most advanced. The result would be paradoxical: delaying the FIDs, making future supply scarce and ultimately reinforcing arguments in favour of weakening ReFuelEU Aviation. Non-fossil fuels (RFNBO and LCFNBO) are two complementary pathways serving the same industrial objective.

The European Commission and the co-legislators now face a decisive choice: either restore consistency across the EU aviation regulatory framework by ensuring equal treatment of RFNBO and non-fossil synthetic aviation fuels; or introduce new regulatory uncertainty that will delay investment decisions and ultimately undermine the very foundations of ReFuelEU Aviation.

EU ETS / SAF allowances: removing a major distortion

The proposed revision of the EU ETS extends the SAF allowances over the period 2031-2040 with a cost coverage of up to 60% of the cost differential for RFNBOs, while no equivalent rate is foreseen for non-fossil e-SAFs (0%). This asymmetry creates a direct distortion between two categories that contribute in the same way to ReFuelEU Aviation's e-SAF sub-quota, as shown in the illustrative table below.

Fuel	Reference price (€/t)	Share of cost covered by SAF allowances	Price after application of SAF allowances – excluding any correction factor (€/t)
eSAF RFNBO	6 000	60%	2 970
eSAF non-fossil	6 000	0%	6 000
French eSAF (40% RFNBO, 60% non-fossil)	6 000	24%	4 788
Advanced biofuel	3 000	50%	1 975
HEFA	2 000	0%	2 000
Conventional jet fuel	950	0%	950

For illustrative purposes, a French e-SAF production project may produce 40% RFNBO-compliant e-SAF, eligible for SAF allowances, and 60% non-fossil synthetic aviation fuels, which would not benefit from SAF allowances under the Commission's proposal. This unequal treatment would artificially create a cost advantage of nearly €2,000 per tonne of e-SAF for RFNBO-only production, after accounting for SAF allowances.

As French e-SAF projects are expected to secure binding offtake agreements in 2027, paving the way for FIDs, this distortion could encourage fuel suppliers and airlines to postpone their purchasing commitments in anticipation of cheaper alternatives. Yet such RFNBO-only supply may ultimately prove insufficient or unavailable.

France Hydrogène's recommendation — provide for *a rate of 60% coverage of the cost gap with conventional jet fuel for non-fossil synthetic aviation fuels by SAF allowances, in line with the rate provided for RFNBOs.*

RED IV: Aligning national accounting with ReFuelEU Aviation

Today, non-fossil e-SAFs can contribute to the ReFuelEU Aviation obligations borne by fuel suppliers, but not to Member States' RED targets in the same way as RFNBOs. This regulatory inconsistency could indirectly undermine the financing of e-SAF projects: a Member State may be incentivised to reserve a DSA or CfD for RFNBOs only in order to maximise its contribution to its clean energy targets.

Such a situation would be inconsistent with the common treatment of the two categories in ReFuelEU Aviation and with the Commission's repeated policy statements on e-fuels, which now assume this environmental equivalence between non-fossil RFNBO and LCFNBO.

France Hydrogène's recommendation – allow *non-fossil synthetic aviation fuels* to contribute to the clean energy targets applicable to Member States in the future post-2030 framework, both at the level of the global target and the specific target for transport (which must imperatively include a specific sub-obligation for electrolytic hydrogen and its derivatives).



Conclusion — Securing FIDs, not weakening ambition

Europe has a pipeline of projects capable of supporting the trajectory of ReFuelEU Aviation. The initial delay is real, but it is due to a delay in the implementation of the de-risking instruments and not to a structural shortage of production capacity. The regulatory priority must therefore be to secure the FIDs and the commissioning of the first production facilities.

Three principles stem from this: preserving the integrity of the e-SAF sub-quota by temporarily accommodating delays in production ramp-up; directing European support towards a production base located in Europe; and treating RFNBO and synthetic non-fossil fuels fairly in the instruments that complement ReFuelEU Aviation. **The consistency of this regulatory framework will determine the Union's ability to transform its project pipeline into a sovereign industrial sector.**

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Engagée pour la transition écologique

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