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Biomass consultation response Feb 2026

General statement

AEF is the UK's leading NGO campaigning exclusively on aviation's environmental impacts, including decarbonisation of the industry. Our response to the consultation is largely informed by our analysis of the operation of the UK SAF mandate and its interplay with biomass as a feed-stock. Broadly, we welcome the plan to scope out a sustainability framework for biomass use in economy-wide decarbonisation, and an analysis of the potential conflict between different government incentive schemes. The introduction of the UK SAF mandate has led to increased attention on the extent to which biomass and agricultural waste should play as a potential feedstock for alternative aviation fuels; this has given a real-world view on some of the critical issues the consultation is seeking to address.

AEF is concerned that without economy-wide planning, biomass will go to the "highest bidder" - the industry that can afford to pay a premium, which could lead to crops and biomass being used inefficiently for feed-stocks. AEF has [cautioned](#) that this does not necessarily lead to the most efficient economy wide decarbonisation, as there has hitherto been little detailed exploration of whether chopping down forest to produce feedstock for a fuel which is then burnt in a plane is the best way of using that biomass, or whether it would be better used in BECCS for example, or for anaerobic digestion, back-up power generation as part of the UK's Clean Power Plan, or bio-gas.

This consultation raises a further, related issue "*Bioenergy deriving from consignments with low life cycle emissions can become disproportionately carbon intensive if excessive feedstock is consumed to produce only a limited amount of energy*". Regarding this, we would like to draw attention to questions of e-fuel pathways, where renewable energy, green hydrogen and BECCS-captured CO₂ are combined to make aviation fuel – each of these ingredients for e-fuels have multiple uses – the green hydrogen can be used in agriculture, the renewable electricity can be used to decarbonise the grid, the BECCS CO₂ can be sequestered underground. There are fundamental questions about whether taking these base ingredients and then burning them in a plane, thus re-releasing all the CO₂ contained within them, is the "best" or most efficient use of those resources. This mirrors what the CCC has concluded on the "best-use" of zero-carbon electricity.

This DESNZ consultation shows clearly that the rules of the SAF mandate, which currently excludes crops, are generally considered to be at the higher end of sustainability guarantees. Yet at the same time, the Department for Transport (DFT) is worryingly gathering views in a contradictory call for evidence about the possible inclusion of crop-based biofuels in the SAF mandate. Not only are the risks of indirect land use change

(ILUC), deforestation and biodiversity loss in the creation of biofuels extremely well known from decades of research into deforestation caused by the clamour for road bio-fuels, there are associated risks to the UK of growing energy crops for fuel feedstock which include losing the important nitrogen-fixing role of many winter cover crops, soil carbon loss from disturbance and associated reductions in food yields. There is also clear evidence emerging of real-world problems in the chain of custody of sustainability reporting, including fraud and feed-stocks such as beef tallow, being potentially allowed under the UK SAF mandate, even when there is clear evidence of illegal deforestation in the Amazon to allow for cattle ranching.

Although currently outside of conventional SAF accounting, alternative approaches such as the carbon opportunity cost also argue against using land for biomass and SAF. The Carbon opportunity cost considers the potential of the land as a carbon store if it was left to grow naturally as a counterfactual for calculating the impact of growing feedstocks.

Finally, we would urge you to draw together the strategic objectives of the government's waste hierarchy with the objectives of this proposed sustainability framework, in the possible creation of a similar biomass hierarchy. As the UK is positioning itself as a world-leader in the development of 2nd generation aviation fuels from waste feed-stock (again through another government incentive scheme, the Revenue Certainty Mechanism), it's vital to understand the complex interactions of what is classed as agricultural waste and whether some of these "wastes" will ultimately be produced on demand for fuel feed-stocks, placing further pressure on land which could be used for nature protection or food production. We welcome this attempt to provide harmonisation of the varying Life Cycle assessments used in different international accounting systems, for example Corsia methodologies on some of the ILUC questions vary quite widely from what is acceptable under the EU's RED III rules, and different again to the carbon intensity calculations of the SAF mandate. There is evidence that this is already leading to fuel producers and suppliers choosing to target particular fuels from particular feed-stocks at different international markets, according to where the rules are most advantageous.

1. Do you agree that the initial scope of the framework should be limited to bioenergy that is subject to government incentive schemes? If not, please explain why and provide evidence to support your response.

Yes, we agree that the divergence between biomass incentive schemes risks market distortions which may not lead to the most climate-efficient outcome in terms of emissions reductions. We agree that a common sustainability framework would enable a consistent government view on sustainable biomass. Therefore, government incentive schemes should all be aligned on sustainability criteria, and decisions about where biomass is deployed should not be left to market forces alone to decide.

6. Do you agree with the list of key feedstock categories and their definitions in scope of the common framework? Please provide evidence to support your response.

We support the attempt to categorise the different types of biomass. However, this list shows the difficulty of the interactions between what is considered "waste" and what is considered an agricultural product, and the complexity of the interactions between different government

incentive schemes. Careful consideration needs to be given to incentivising waste, in particular for the production of alternative aviation fuel, if that waste is actually from agricultural sources and could be considered a crop. Crop feed-stock is currently banned under the SAF mandate (although, as discussed elsewhere the DfT is somewhat paradoxically running a call for evidence on whether the SAF mandate should allow crop-based feed-stocks in the future). Careful consideration needs to be given to how sustainability guarantees on “wastes” such as sawmill waste, forestry and energy crops are categorised alongside biomass for energy production. The same question goes for cover crops which have a vital role to play in soil fertility and capturing carbon in soil and may not be considered to be wastes by the agricultural community. We urge you to apply whole systems thinking to these complex problems, and thoroughly calculate the full life cycle carbon intensities of the different pathways, and take an inter-departmental approach to deciding which is the best approach.

10. Do you agree with the list of protected highly biodiverse land categories where sourcing is not allowed? Please provide evidence to support your response.

Yes, we very much support the continuation of protecting highly biodiverse land. The evidence of what a race for biofuels in the early 2010s did to the Indonesian rainforests is well documented and there is no reason to believe that it will not be repeated in the case of increasing maritime and aviation biofuels. Potential SAF producers are looking at every possible feed-stock they can use to tap into a growing global market, and forest residues and sawmill waste are known to be potential feed-stocks. There is likely to be an increase in these types of alternative fuels as the UK SAF mandate and EU Refuel legislation incentivise alternative fuel production, and the legislations tighten the restrictions on UCO and Hefa based fuels beyond 2030. We strongly recommend harmonisation with the EU RED III rules ahead of the surge in these types of feed-stocks, particularly given the complexity of global supply chains. The proposed land criteria look strong and we would encourage you to apply them across all possible uses of biomass.

We would like to take the opportunity to present a case study to show real-world evidence of the impacts of the demand for alternative fuels causing ILUC changes in Brazil.

Reported [evidence](#) highlights that a company has been producing alternative aviation fuel made from beef tallow sourced from slaughterhouses that have bought cattle from illegally deforested ranches in the Amazon. The fuel is produced in the US, where the company can claim tax credits for producing biofuels, and some of it has been shipped to the UK where it presumably entered the UK aviation fuel supply and was burnt on planes leaving the UK. The story shows beef tallow can be potentially permitted under multiple sustainability accrediting regimes because of a loophole which classifies it as a by-product, and therefore not subject to the same ILUC “high risk” criteria as for example, palm oil. ISCC certification means that beef tallow can be aligned with Corsia and RED III – but this example clearly shows that tallow is a feed-stock at high risk of creating ILUC, and should be subject to greater scrutiny.

It is important to note that in addition to the difficulty of guaranteeing sustainability at the beginning of the fuel’s journey, it is also hard to track the use of this fuel once it reaches the UK, because the DfT does not track imports of SAF into the UK, the only publicly available information comes from fuel suppliers’ claims in terms of where the feed-stock was sourced (based on ISCC certification). There are well-known problems with the ISCC accreditation process, and a strong case for UK government spot checks on these issues. Despite the EU RED III having the power to designate feed-stocks as high risk for ILUC, beef tallow is not considered high-risk as it is considered a by-product. Similar issues have caused high-level

disagreements at ICAO where states have disputed how ILUC should be credited at a national level for corn ethanol.

17. Should the crop cap be set at a sector level subject to sector specific ILUC risk assessments? If not, please suggest what level a cross-sector crop cap should be set at and provide evidence to support your response.

We would argue that for biomass use in aviation decarbonisation through the creation of biofuels, the answer is yes.

While we would question the immediate assumption that aviation is “hard to abate” and therefore should be entitled to use biofuels (there are other alternatives to achieving the decarbonisation goal – reducing flying, taxing flying, increased use of GGRs, developing new technologies, promoting train travel, they are just not being pursued by the current government), current government policy is incentivising the development of new feed-stocks to create alternative aviation fuels, and as the Brazil example shows, this is leading to new ILUC risks. We see here that demand in biofuel feed-stock is being driven principally by one industry, and one that is still on an emission growth trajectory, and one which is on track to be the UK’s highest emitting sector by 2040. It is logical to conclude that additional pressure to convert land to feed-stock production will come from incentive schemes such as the UK SAF mandate as the requirements of the mandate increase, especially if aviation emissions growth is not constrained.

Additionally, special attention should be paid to what impact subsidising the production of corn ethanol as a feed-stock for jet fuel has had on food production and ILUC in the US. There are calls to allow in British corn ethanol as a feed-stock to the UK SAF mandate, partly because President Trump’s tariffs on UK producers mean that UK corn ethanol plants are facing closure – if this is allowed, it could also lead to more UK land being brought into production for corn ethanol, causing ILUC, biodiversity loss and potentially a reduction in UK food production.

A further question is how does this interact with another flagship UK aviation decarbonisation policy and other government priorities – for example the Revenue Certainty Mechanism, which is setting up contracts for difference to companies which want to develop FOAK SAF plants from 2nd generation waste as a feed-stock. Not restricting the use of corn ethanol (or other biofuels) will surely undermine the success of this policy, which is also designed to promote job creation and energy independence in the UK. This is a sector specific risk. As the crop exclusion already exists in the SAF mandate, designed to mitigate against these risks, we would strongly recommend that the government does not bow to industry lobbying to amend the SAF mandate to allow in crop based biofuels. In the event that it materialises, the food competition criteria, land criteria and soil health criteria should be included alongside the ILUC assessment.

20. How could high ILUC risk feedstocks be identified? Please include what factors could be considered and provide evidence to support your response.

Based on our example above, there should be a thorough updated assessment of the designation of beef tallow as a byproduct which therefore precludes it from being assessed as a “high-risk” of ILUC feed-stock under RED III and Corsia rules. Reported evidence has emerged of fuel derived from beef tallow sourced from illegally deforested land finding its way into SAF imports into the UK, which we believe will be claimed under the SAF mandate.

21. Should high ILUC risk feedstocks be phased out? If yes, please provide a timeframe and state if it should be at a cross-sector or individual sector level. Please

provide evidence to support your response and explain how this could be done in compliance with international rules, e.g. WTO compliance.

Yes - in the case of the SAF mandate this must be done before the Hefa cap is fully rolled out (2040) to ensure that higher quality SAFs are deployed

25. Should dedicated energy crops be required to meet the agricultural land criteria? If not, please explain why and provide evidence to support your response.

Yes, we support the proposal to require all energy crops to meet the agricultural land criteria. We would argue that they should meet the soil criteria as well, as they play a role in maintaining soil carbon and nitrogen fixing for soil health.

29. Do you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans? Please provide evidence to support your response.

Yes. From an aviation perspective, as competition for eligible feed-stocks increases as the UK SAF mandate phases out the use of HEFA feed-stocks post 2030, there will be an intense, government-incentivised pressure to find alternatives. This is already beginning with industry lobbying to include crop based biofuels in the SAF mandate, and the DfT has launched a call for evidence on this. It's absolutely vital that any analysis of eligibility bears in mind the impact on food security of removing cover crops and thus vital nutrients from the soil, as it should also change the project boundaries of the life cycle assessment to include the loss of carbon sequestered in the soil in the emissions associated with the feed-stock and fuel.

31. Do you agree that agricultural residues should comply with the soil criteria? Please provide evidence to support your response.

Yes as above

32. Should 'other crops' (where the whole plant is used as a bioenergy feedstock) have to comply with the soil criteria? Please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to these feedstocks.

Yes as above

33. Should dedicated energy crops have to comply with the soil criteria? Please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to dedicated energy crops.

Yes as above

53. Do you agree that roots should be an ineligible feedstock? Please provide evidence to support your response.

Yes. We agree that because of their key role in fixing nitrogen and carbon in soil, roots should be excluded for the same reasons as cover crops under the soil criteria.

60. Do you agree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria? Please provide evidence to support your response.

Yes, as explained above, government policy such as the SAF mandate and the Revenue certainty mechanism are incentivising the uptake of alternative aviation fuels. Other countries are also implementing similar schemes, meaning that the global demand for feedstocks will only increase. Upcoming restrictions on feed-stock eligibility from 2030 onwards only increases that pressure. Therefore, as novel feed-stocks are sought out, there should be blanket rules that ensure the forest criteria are met, and government incentive schemes should not incentivise the use of feed-stocks that are known to promote forest loss, such as biofuels.

70. Do you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria? Please provide evidence to support your response.

In order to answer this, we need to be clear what is considered to be a waste. The UK SAF mandate allows Hefa (used cooking oil) as a waste, and assesses its carbon reduction potential against the counterfactual that the oil would be thrown away if it wasn't turned to aviation fuel - the RTFO rewards twice the amount of RTFCs to biofuels derived from certain wastes and residues, this means "waste" has the potential to be disproportionately attractive as a potential feed-stock. We are concerned about this, because much of the UK's used cooking oil is not in fact a waste, but is used to produce biodiesel in the road transport sector.

As we have raised elsewhere the Department for Transport is running a call for evidence about allowing crops into the SAF mandate, we need to be very careful how these crops are classified. We do not believe that agricultural residues, cover crops, roots and forestry "wastes" should be eligible as feed-stocks for aviation fuel. As you have pointed out above, they have a key role to play in fixing carbon and nitrogen in soil, and should therefore be subject to the land and soil criteria if they are considered to be eligible. This should also be the case for any other potential sources of "waste" from agriculture - sawmill logs, residues etc.

72. Are there any emerging or novel biomass feedstocks for which sustainability criteria may need to be developed? If so, please specify the feedstocks and suggest criteria that would mitigate potential environmental harms arising from the sourcing of the feedstock.

Sewage - how is it classified - waste or fertiliser if some of it is used for soil health. It should be subject to the soil criteria.

Algae - we believe new sustainability criteria would be needed for algae.

76. What environmental or social concerns are there regarding the wider biomass supply chain? Please be specific about their nature and the sectors that these concerns relate to.

AEF has produced [research](#) that shows the complexity of the international supply chains of "sustainable" aviation fuel, and has highlighted areas where documentation and proof of sustainability is questionable. For example, much of what is credited under the SAF mandate relies ultimately on ISCC certification at the bottom of the chain. Criticisms of this process are well known. The ISCC does not visit every single production site to verify whether

emissions savings and sustainability criteria are really being enforced, and there are many examples of supply chain fraud – we have noted the Brazil case, but there is also documented examples of [fraud](#) in imports of “used” cooking oil. There are also well known concerns about the use of [default values](#), which may not reflect the actual carbon savings associated with a feed-stock, and the mass-balance approach which apportions non-physical values to products, which can lead to overstatements of sustainability claims and misleading of consumers or corporate buyers of alternative fuels. There have been many calls for ISCC accreditation to be overhauled, yet it continues to form the backbone of verifying the use of biomass in schemes such as the UK SAF mandate.

78. Do you agree that the proposed life cycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions? If not, please specify which parameter is not appropriate for your sector and justify your answer. Please provide evidence to support your response.

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These life cycle parameters look to offer a sound basis to assess the emissions from bioenergy given the limitations of what is proposed in this consultation. While it is not up for debate in this consultation, it remains a moot point whether there is any guarantee that the assumption of biomass as “carbon neutral” at the beginning of its journey is correct – whether the current growth (and future growth of in a climate stressed future) of existing biomass balances out the emissions from the biomass being combusted on a global scale is not assessed. It’s outside the scope of this consultation, but we believe any well-designed biomass “hierarchy” should also include an assessment of the end-use of the product in the life cycle – it is likely that burning biomass to provide energy and then sequestering the resulting CO₂ underground (energy BECCS) would provide a more efficient climate outcome than burning that biomass in a plane. This is further influenced by whether negative emissions from CCS are allowed under LCAs. Specifically, for aviation this might indicate that it is better to stimulate the development of engineered carbon removals, rather than promoting the use of biomass to produce fuels and e-fuels which are then combusted, re-releasing the carbon into the atmosphere.

As has been noted in the consultation, changing the project boundaries can significantly alter the performance of a particular feed-stock in the case of biofuels, and it’s important when trying to get public buy-in for government incentive schemes and policy which is driving decarbonisation, that the justification for choosing one feed-stock over another is clear. For example, the UK SAF mandate currently allows in HEFA, waste oils, as a feed-stock – currently UK based HEFA is awarded a 95% emissions reduction, 4g carbon intensity – significantly higher than Hefa from abroad. Assuming this is because HEFA is assessed against the counter-factual that it will go into landfill (rather than biodiesel where it all goes today), showing how fundamentally changing the LCA boundaries can affect emissions savings calculations. This leads to fundamental questions about why anyone should have to pay for e-fuels, which will be up to 10 times more expensive, and which, according to the policy, will only be able to claim a maximum of 100% emissions savings (just 5% higher) - because currently negative emissions from fuels are currently not allowed.

80. Do you agree with the approach on system boundary application? If not please explain why, including the impacts on your sector. Please provide evidence to support your response including sector-specific impacts where possible.

As we suggested above, we believe that there is some risk that the public does not fully appreciate the nuance between carbon neutral and net carbon neutral - SAF still produces the same emissions when combusted as kerosene. The way that LCAs are applied leads to

that conclusion, and as noted in the consultation, change the boundaries and you can get a quite different answer to the carbon savings implicit in a feed-stock. We believe more attention needs to be paid to building the public trust in emissions reductions pathways, especially if they will result in more expensive aviation fuel.

81. Do you agree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies? Please provide evidence to support your response.

Yes, we agree and we support the use of the 3 suggestions to do this, with a preference for the first option which is a crop cap or feed-stock exclusion. We note that the UK SAF mandate under the RTFO currently excludes crops from use as a feed-stock for the production of alternative aviation fuel, which we strongly agree with, and we note with disappointment that the DfT is currently asking for evidence with a view to dropping this powerful exclusion in favour of including crops. We believe that the evidence of harm from crops being used as biofuels is overwhelming, particularly when it comes to ILUC. We have highlighted reported evidence in this consultation response of how the use of beef tallow as a feed-stock for SAF could be driving illegal deforestation and land-use change in the Brazilian Amazon. Properly understanding the emissions impact of this ILUC and forest change should be a key part of any lifecycle assessment, and no feed-stock should be given government support or an incentive if there is reasonable concern that markets are favouring a feed-stock because of its eligibility under sustainability schemes.

87. Do you agree that thresholds under the GHG criteria should be set by individual biomass policies instead of a single cross-sector biomass supply chain threshold? Please provide evidence to support your response.

We agree this is a good approach. However, we would add that this consultation proposes that policy should direct limited sustainable biomass to sectors where they deliver the greatest decarbonisation impact. We would argue that this is not the case for aviation where decarbonisation is relying on biofuels from biomass. In our [briefing](#), "is SAF the most efficient route to economy-wide decarbonisation", we argue that for every feed-stock proposed, there is already a "better use" or a more efficient use of the scarce feedstock than carbon intensive processing, transportation and then burning it in a plane. We have outlined above the issues with e-fuels, and we would argue that the SAF policy should in fact be even more stringent and avoid falling into the trap of funnelling scarce biomass into biofuel feed-stock because of intense (successful) lobbying by the aviation industry that it is "hard to abate" and should therefore take a priority place in the queue ahead of biomass use for home heating, agriculture or grid decarbonisation. Flying is a luxury good, and most of the increase in emissions is coming from a small group of higher-income individuals.

100. Do you agree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions? Please provide evidence to support your response.

Yes, we agree and this is a useful provision which already exists in the UK SAF mandate. However, we would argue that there should be even more mandatory reporting and publicly available data about where the feed-stock is processed and biofuels produced – as we have shown with the example of the Brazilian beef tallow, it is very difficult for the public to fully

trace the sustainability claims of any alternative aviation fuels claimed under the UK SAF mandate. It is also impossible for UK flyers to know that any SAF was actually on the plane that they used, which could lead to claims of greenwashing.

105. Do you agree with the above proposal on publishing sustainability data? Please provide evidence to support your response.

We have dedicated a significant proportion of our work over the last year to trying to fully understand the accounting of the sustainability of feed-stocks used for alternative aviation fuels from origin to point of use. Our findings are available [here](#). We believe that there continue to be concerns about whether the sustainability of certain feed-stocks can be proved across complex supply chains – there are well-known concerns about the reliability of feed-stock certification processes such as ISCC, and as we show in the Brazil case study, it is not possible to use publicly available data to fully trace the feed-stock from origin to point of use in a plane in the UK. When we asked the Low Carbon Fuels team to explain to us where a shipment of SAF, coming from the US, made from beef tallow feed-stock from Brazil, had arrived in the UK and where it had been piped to and which airports it had been uplifted from, we were told that the publicly available data under the SAF mandate “does not track import or export of fuel into the UK”, nor does it track “where the fuel was produced”. It also does not give us the name of the fuel suppliers which have claimed the sustainability certificates.

We would argue that this lack of transparency in sustainability data seriously undermines the public’s faith in any sustainability claims made about fuels made from biomass and could lead to claims of greenwashing. It is reasonable to ask as a consumer – if you’re being asked to pay more for a flight that uses SAF – whether there is indeed any SAF on board your flight, and whether there has been a genuine emission saving further up the supply chain to balance out the emissions which will happen when the fuel is combusted. From a thorough investigation of the publicly available data we would say that currently the public would be unable to answer that question with any level of confidence. Therefore, we strongly support any proposal to increase the transparency of global supply chains through the publishing of detailed sustainability data.

106. Which data points should be included to improve the transparency of sustainability practices across the biomass incentive schemes? Please provide evidence to support your response.

As above – what alternative aviation fuels have been imported and exported from the UK, where were the fuels produced, where they have been supplied to, which airlines and flights have uplifted them, and what the full emissions impacts of those flights are – included the point at which the fuel is combusted. This goes much further than weak reliance on 3rd party sustainability certification schemes such as ISCC which have been identified as ineffective and where there has been clear evidence of fraudulent claims made on biomass certification.

Call for evidence

117. What challenges and barriers to achieving this are you aware of? For example, are there specific feasibility or cost concerns with overseas site visits?

It is likely to be challenging to reach all the sites where biomass feed-stock is being produced, due to distance, political instability in particular places, gaining permits and access. To do this kind of monitoring properly, it would be necessary to visit more than once

because land use change happens quite rapidly, especially when new policies such as the SAF mandate and Refuel EU are incentivising the hunt for alternative feed-stocks for alternative fuels.

118. What benefits do you see this providing to the monitoring and assurance of biomass sustainability?

The main benefit of this would be to strengthen public acceptance and support of any sustainability claims made about alternative fuels – if certification was done by a trusted UK government body, consumers and corporate buyers of alternative fuels would be able to trace the veracity of sustainability claims, instead of having to rely on dubious evidence from third parties such as ISCC, which have been repeatedly criticised for insufficient checks and not picking up on supply chain fraud. If the public is to be expected to support the transition to a Net Zero economy, they need to be able to trust that the things they are being asked to pay more for (in this case, more expensive alternative aviation fuel), are actually delivering the climate benefit claimed. We have provided several strong pieces of evidence of where sustainability claims relating to alternative aviation fuels have turned out to be fraudulent. Without this clearly understandable chain of custody reporting, there may be public backlash against policies which incentivise the use of biomass for climate reasons.

119. Should incentive schemes have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process? Please provide evidence to support your response.

This is vital and goes to the heart of our answer to question 118 – without clear evidence and data supporting sustainability claims, it is unlikely that the public will be willing to accept increased costs coming from the implementation of key UK decarbonisation policies such as the SAF mandate. As noted above, it is already quite difficult to understand the publicly available information and data from the SAF mandate. The public is being asked to rely on what unnamed fuel suppliers have claimed via a complex system of tradeable certificates which often rely on assumed sustainability criteria and default values. As we have already alluded to, being able to trace sustainability claims from feed-stock production to fuel being burnt in planes above our skies is almost impossible – we have been unable to find a fully comprehensible chain of custody, even with the help of top academics in the field of life-cycle analysis.