

(Out of scope)

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Sent: Friday, April 16, 2021 10:47 AM

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MES Daniel (CAB-TIMMERMANS) [REDACTED] HIESINGER Stefanie

(CAB-TIMMERMANS) [REDACTED]

Subject: Follow-up to our exchange - Green Deal - Air France KLM

Dear Mr. Samsom,

As a follow-up from the very rich exchange [REDACTED] and myself had with you and your team on 31 March, for which we would like to thank you again, we have put together a few elements which I hope you will find of interest.

The attached presentation:


- Shows that air transport is one of the industries most affected by carbon leakage;
- Provides an illustration of competition distortion induced by potential EU measures;
- Provides a case analysis of fuel tankering;
- Gives a tentative example of how, in the absence of a CBAM, free allowances could be maintained in order to limit the effects of carbon leakage.

On fuel tankering, please also find below further explanations based on the example of the Istanbul-Madrid route.


Finally, we would like to stress again that in relation to carbon leakage and distortion of competition, comprehensive air transport agreements are in our view a key issue, as they currently contain very little in terms of environmental provisions. We hope that this could change in the future.

We remain of course at your disposal and that of your team for any questions or comments, and look forward to continuing the conversation in the weeks ahead.

Yours sincerely,





Air France KLM


Fuel tankering opportunities with a SAF mandate. Example on the Istanbul-Madrid route.


On the Istanbul-Madrid route, as on many European routes,  operates mainly widebody aircraft (Airbus A330), and also narrowbody aircraft for a small proportion of their flights.

Widebody aircraft are able to fly the round trip journey Istanbul-Madrid-Istanbul **without** refueling in Madrid (full tankering). Narrowbody aircraft have to refuel in Madrid, but they can reduce by approximately 60% the volume of fuel they purchase in Madrid, by taking additional fuel at the start of their journey in Istanbul (partial tankering).

On these distances, tankering generates additional fuel consumption of approximately 10%, which makes it interesting when the fuel price in Madrid is more than 10% more expensive than in Istanbul.

Based on 2019 prices, the fuel price in Madrid is still cheaper than in Istanbul, which reduces the interest to do tankering from Istanbul to Madrid. Despite this low cost base of fuel in Madrid, and based on an assumed SAF price of 2000€ per ton, tankering fuel from Istanbul would be financially interesting for  for an EU SAF Blending Mandate of 7% or more. Through tankering,  would reduce its fuel consumption in Madrid by more than 90%, and the additional fuel consumption generated by tankering would lead to more than 6000 tCO₂ additional emissions. By avoiding refueling in Madrid,  will also avoid SAF utilisation that could have resulted in 3000 tCO₂ savings or more.

The financial gains are significant: with a 10% SAF mandate,  would make a 4% saving on its fuel bill on this route. These financial savings would even reach 10% for a 15% SAF mandate.

All these results are calculated on Istanbul-Madrid, which is a relatively long European route for  For shorter routes, the financial interest of fuel tankering is even stronger.



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