Reporting of Aviation Fuel Suppliers under Article 10 of ReFuelEU Aviation

Webinar

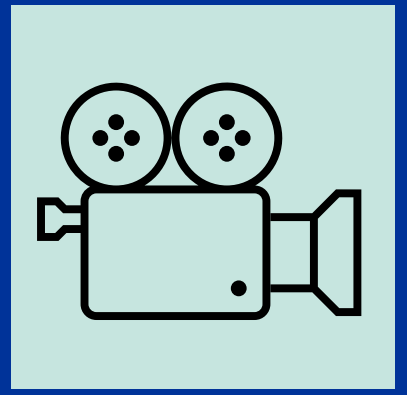
10th December 2025

European Commission

Housekeeping rules

Microphones are muted and camera switch off by default

Q&A allowed in SLIDO during the session



Webinar will be recorded and available in the COM website

Join at

slido.com

#9526 200

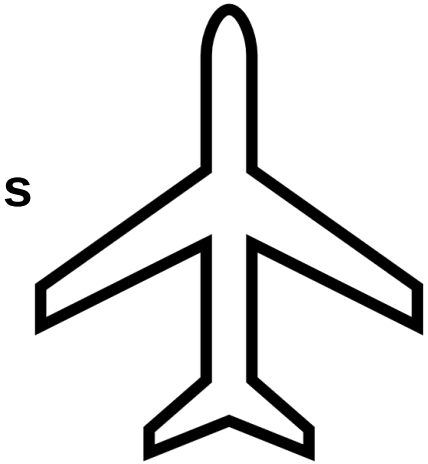
Passcode: **uh4zrj**

Agenda

Welcome and introduction
- Agenda points
- Results of the first reporting exercise – 2024 data

Overview of the reporting obligations
- Obligated parties
- Required datasets

Clarification of key aspects impacting the reporting obligations
- Differentiating fuel supplied ‘’To’’ vs ‘’At’’ Union Airports
- Differentiating voluntary SAF amounts and totals of fuel supplied
- Supply chain point for reporting of fuel properties

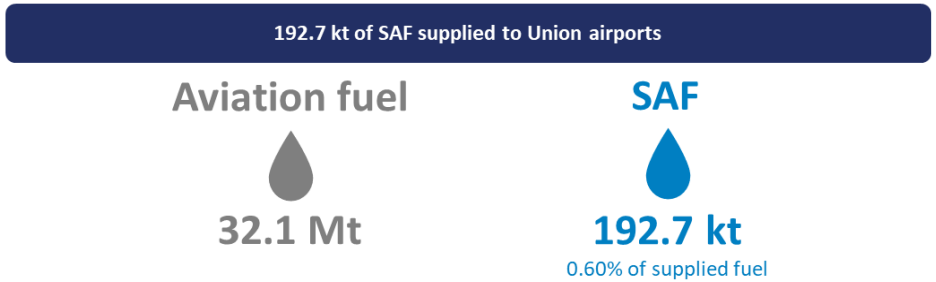


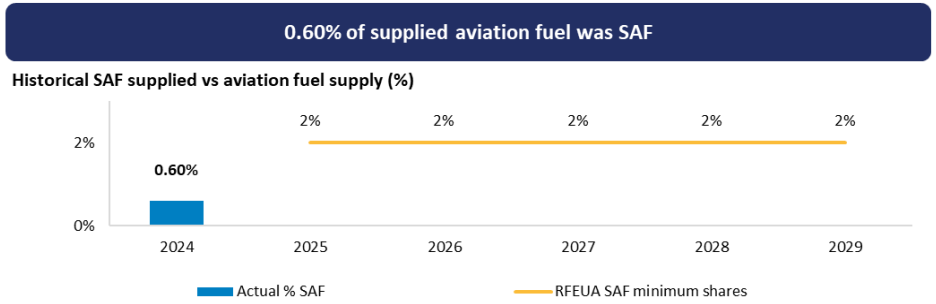
How to fill in the reporting templates
- Template A & worked example
- Template B & worked example

Reporting showcase
- Logging and reporting in UDB & CIRCABC

Market response to the mandates
Fuel reported by aviation fuel suppliers - 2024

- **Legislation Adopted:** ReFuelEU Aviation Regulation was officially adopted in 2023.
- **Mandate Timeline:** Stakeholder reporting obligations began in 2024, with the SAF blending mandates (Art. 4) starting in 2025.
- **2024 Reporting Status:**
  - 83/123 obligated aviation fuel suppliers reported their data.
  - 32 Mt of total aviation fuel were reported (out of an expected 41Mt).
  - 192.7 kt of Sustainable Aviation Fuel (SAF) was reported.





The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Overview of reporting obligations

Quick overview

Who

Aviation Fuel Supplier (AFS)

defined in RFEUA (Article 3.19) and Directive (EU) 2018/2001

What

AFS should report data regarding the aviation fuels include any SAF or eligible fuels delivered **to** and **at** Union airports.

When

Reporting period from 1st of January until the 31st of December & reporting exercise between 1st of January and 14th of February of the subsequent year

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

What are aviation fuel suppliers required to report under Article 10?

a) *the amount of aviation fuel **supplied at each Union airport**, expressed in tonnes;*

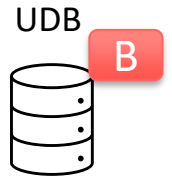
b) *the amount of SAF **supplied at each Union airport**, and for each type of SAF, as detailed in point (c), expressed in tonnes;*

c) *the conversion process, the characteristics and origin of the feedstock used for production, and the lifecycle emissions of each type of **SAF supplied at Union airports**;*

d) *the content of aromatics and naphthalenes by percentage volume and of sulphur by percentage mass in aviation fuel **supplied per batch, per Union airport and at Union level**, indicating the **total volume and mass of each batch** and test method applied to measure the content of each substance at batch level;*

e) *the energy content for **aviation fuel** and **SAF supplied at** each Union airport, for each type of fuel.*

AFS xls reporting fuel supply **at** UA **to** AO



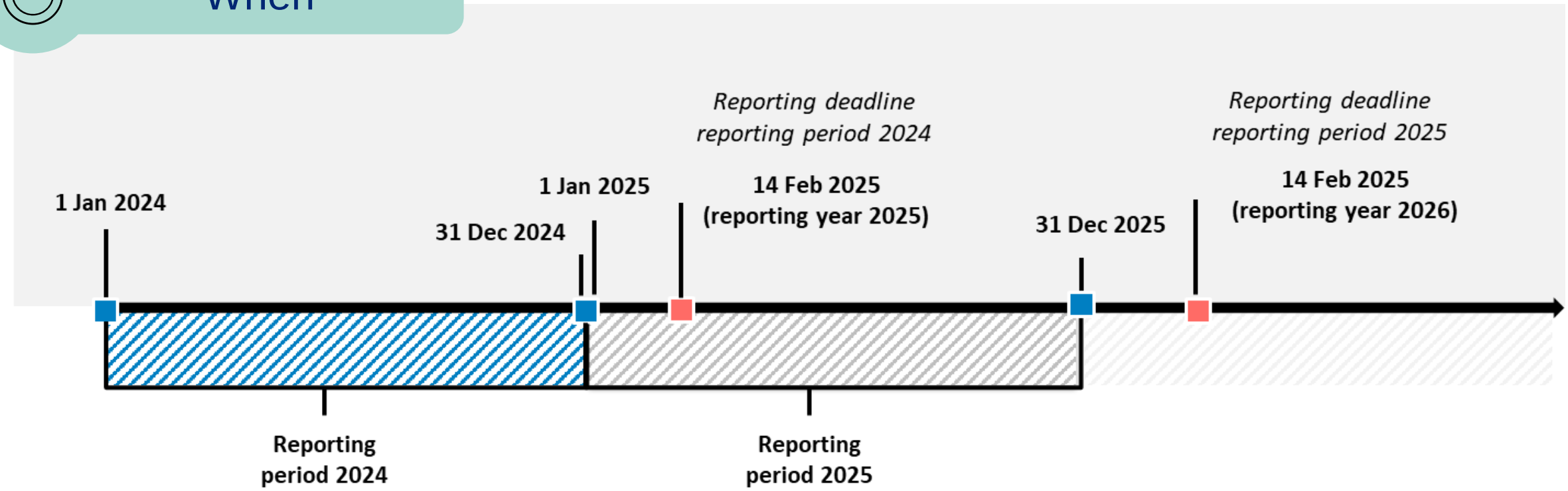
AFS reports latest available data (measured) prior to delivery **to** the UA

AFS xls reporting fuel supply **at** UA **to** AO (SAF)

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

AFS Reporting timeline

When



The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

How to report obligations under RFEUA

Template A

'**Reporting Template A - SAF and total aviation fuel**' is intended to collect the relevant information required as per **Article 10 a), b), c) and e)**.

Template B

'**Reporting template B - Aviation fuel properties**' is intended to collect the relevant information required as per **Article 10 d)** for aviation fuel supplied to Union airports. **Reporting Template B** facilitates a bulk upload of aviation fuel data (per batch) to the UDB. Note that, alternatively, the aviation fuel supplier may also enter batches manually in the UDB directly (via the UDB menu 'Report on Aviation fuel properties', accessible via the UDB account).

For the 2025 reporting period and until further notice, and as a temporary measure until traceability and reporting is fully implemented in the UDB, the relevant information as per RFEUA Article 10 will be reported by aviation fuel suppliers via the UDB and CIRCABC platforms

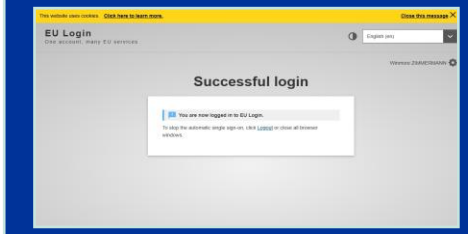
The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

How to report obligations under RFEUA

Platform	Used for reporting which information?	Process of information submission
UDB (Union Database)	• **aviation fuel properties** supplied to Union airports, as per Article 10 d)	The aviation fuel supplier has two options of submitting the information as per Article 10 d): a) Enter batches manually in the UDB directly (via the UDB menu 'Report on Aviation fuel properties') b) Enter batches in Reporting Template B (= Excel file that facilitates a bulk upload to the UDB) and subsequent automatic upload to the UDB
CIRCABC **(access via the aviation fuel supplier's account in the UDB)**	• **aviation fuel amounts** (inclusive of any SAF), as per Article 10 a); • **SAF amounts and characteristics**, as per Article 10 b), c); and • **energy content** for both SAF and aviation fuel, as per Article 10 e)	The aviation fuel supplier is required to enter the required information in Reporting Template A. Reporting Template A should subsequently be uploaded by the aviation fuel supplier to their respective folder on the CIRCABC platform. The respective CIRCABC folder can be accessed through the aviation fuel supplier's UDB account, via navigating to the menu 'Report on SAF, other eligible aviation fuels & totals'.

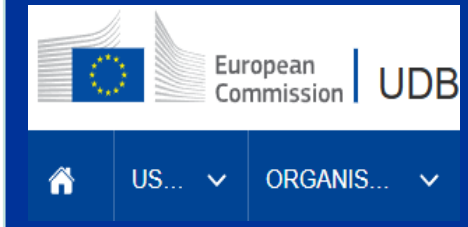
The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Onboarding processes - 3-step approach



1 – *Ensure that you have an EU login account*

- An EU Login account is the European Commission's user authentication service.
- You only need to create one EU Login account to access multiple EU-run services, and various other online platforms managed by the European Commission



2 – *Create an account in the Union Database*

- Register yourself as an economic operator to upload **Template B.**
- Contact your competent authority to have access to the aviation-specific module.
- Would you find any challenges first contact your Competent Authority, and only then the UDB Technical support team.

3 – *Confirm that you have been onboarded in CIRCABC Interest Group*

- This Platform is where you will upload your **Template A.**
- It is managed by MOVE Technical team, as such, would you need to be onboarded in your relevant group, contact us through ReFuelEU Aviation Functional Mailbox.

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Clarification of key aspects impacting the reporting obligations

Clarification of key aspects impacting the reporting obligations

Fuel supplied ‘to’ vs. ‘at’ Union airports

Voluntary SAF amounts & totals

Aviation fuel properties

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Clarification of key aspects impacting the reporting obligations

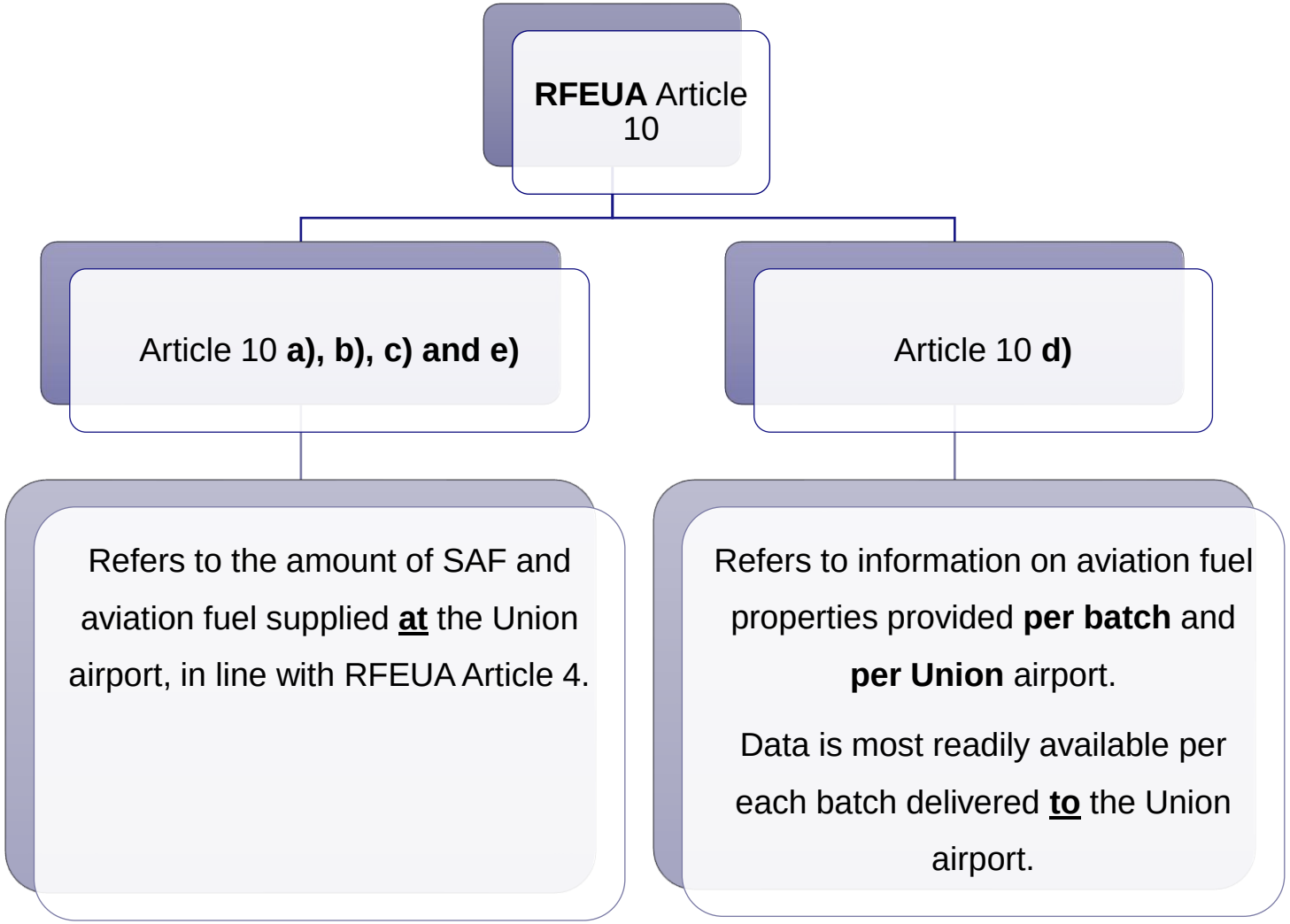
Fuel supplied ‘to’ vs. ‘at’ Union airports

Voluntary SAF amounts & totals

Aviation fuel properties

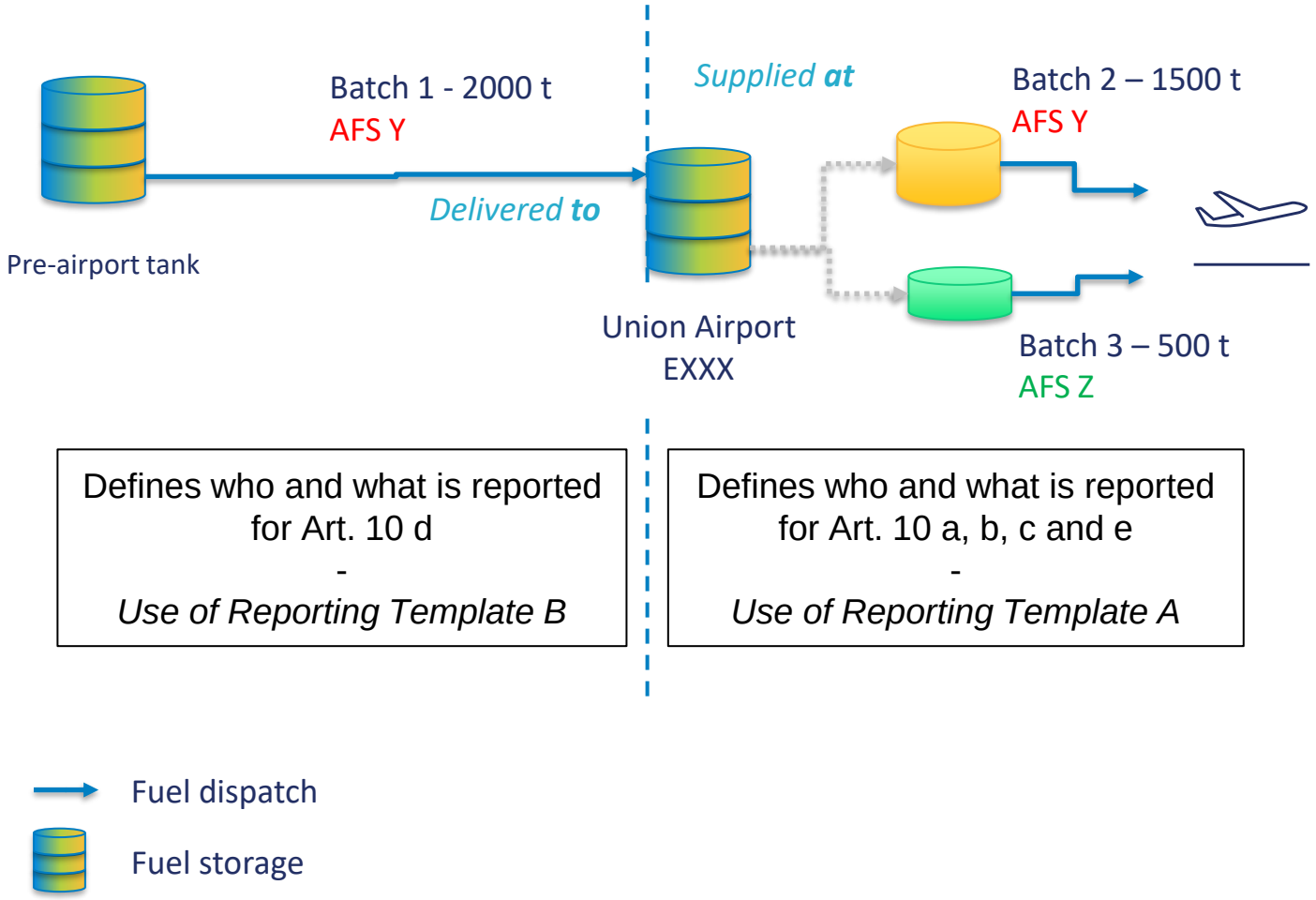
The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

For reporting under Article 10, it is important to consider the distinction between fuel supplied ‘to’ vs. ‘at’ Union airports



The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Practical example: Distinction between fuel supplied ‘to’ vs. ‘at’ Union airports



Note:

Due to the difference in scope stemming from ‘to’ vs. ‘at’, the amounts reported under Article 10 a) may differ from those reported under Article 10 d) **for the same aviation fuel supplier.**

Note:

The Guidance Document also provides instructions on **which SAF & aviation fuel amounts should be reported for which reporting period**, including cases where fuel is in stock at the airport fuel farm by the end of the period.

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Clarification of key aspects impacting the reporting obligations

Fuel supplied ‘to’ vs. ‘at’ Union airports

Voluntary SAF amounts & totals

Aviation fuel properties

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Reporting Template A asks the aviation fuel supplier to differentiate for SAF & aviation fuel amounts

Template A: Tab ‚3. SAF Totals‘

Total amount of SAF supplied at Union Airport that is NOT to be counted towards minimum shares of SAF (in tonnes) *Enter the amount - if any - of SAF supplied at the Union Airport that you wish not to be counted towards the minimum shares of SAF as per Article 4 and Annex I of RFEUA.* *An aviation fuel supplier may choose not to count certain amounts of SAF towards the minimum shares of SAF under RFEUA if doing so would prevent them, or other parties (such as aircraft operators or corporate customers), from accounting for the SAF volume or the associated GHG emissions reduction in a scheme or towards a target that is considered incompatible with RFEUA. This is primarily due to 'additionality' requirements in voluntary reporting frameworks.* *Refer to note (1) under '0. Instructions' for a note on converting from volume to mass, if relevant.*	**Total amount of SAF supplied at Union Airport** (in tonnes) *Enter the total amount of SAF supplied at the Union Airport that you wish to be counted towards the minimum shares of SAF as per Article 4 and Annex I of RFEUA.* *The amount indicated here excludes the amount indicated in the previous column.* *Refer to note (1) under '0. Instructions' for a note on converting from volume to mass, if relevant.*	**Total amount of SAF supplied to in scope aircraft operators at Union Airport** (in tonnes) *Enter the total amount of SAF supplied to aircraft operators in scope of RFEUA at the Union Airport that you wish to be counted towards the minimum shares of SAF as per Article 4 and Annex I of RFEUA.* *The amount indicated here excludes those amounts supplied to aircraft operators not in scope of RFEUA as well as those amounts that you wish not to be counted towards the minimum shares of SAF.* *Refer to the official list of aircraft operators in scope of RFEUA linked in note (4) under '0. Instructions'.* *Refer to note (1) under '0. Instructions' for a note on converting from volume to mass, if relevant.*

Template A: Tab ‚4. Aviation Fuel Totals‘

Total amount of aviation fuel supplied at Union airport (in tonnes) *Enter the total amount of aviation fuel supplied at the Union Airport. Note that this includes the total amount of aviation fuel supplied, i.e. both SAF and conventional jet fuel.* *Refer to note (1) under '0. Instructions' for a note on converting from volume to mass, if relevant.*	**Total amount of aviation fuel supplied to in scope aircraft operators at Union airport** (in tonnes) *Enter the total amount of aviation fuel supplied to aircraft operators in scope of RFEUA at the Union Airport. Note that this includes the total amount of aviation fuel supplied, i.e. both SAF and conventional jet fuel.* *Refer to the official list of aircraft operators in scope of RFEUA linked in note (4) under '0. Instructions'.* *Refer to note (1) under '0. Instructions' for a note on converting from volume to mass, if relevant.*

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Differentiating ‘voluntary’ SAF amounts allows for all SAF to be reported while giving flexibility to not count those amounts towards the SAF mandate

Aviation fuel suppliers may wish not to count certain amounts of SAF towards the RFEUA minimum shares if doing so would prevent them or other parties from accounting for the SAF volume or the associated GHG emissions reduction in a scheme or towards a target that is incompatible with RFEUA (primary example: ‘Additionality’ rules in voluntary GHG reporting frameworks & systems – such as the RSB Book & Claim System, the ISCC Credit Transfer System, etc.)

Reporting Template A provides the aviation fuel supplier with the possibility to **report and specifically exclude** those amounts from counting towards the minimum shares of SAF under RFEUA

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

In addition, Template A allows to differentiate between the amounts supplied ‘at the Union airport’ vs ‘to in scope aircraft operators at the Union airport’

For SAF, the aviation fuel supplier is asked to report:

1) the total amount of SAF supplied at Union airports (deducting the ‘voluntary’ SAF amounts); and

2) the share of 1) that is actually supplied to aircraft operators in scope of RFEUA

For aviation fuel, the aviation fuel supplier is asked to report:

1) the total amount of aviation fuel supplied at Union airports; and

2) the share of 1) that is actually supplied to aircraft operators in scope of RFEUA

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Differentiating between voluntary SAF amounts and amounts of SAF & aviation fuel totals

Aviation fuel supplied at UA

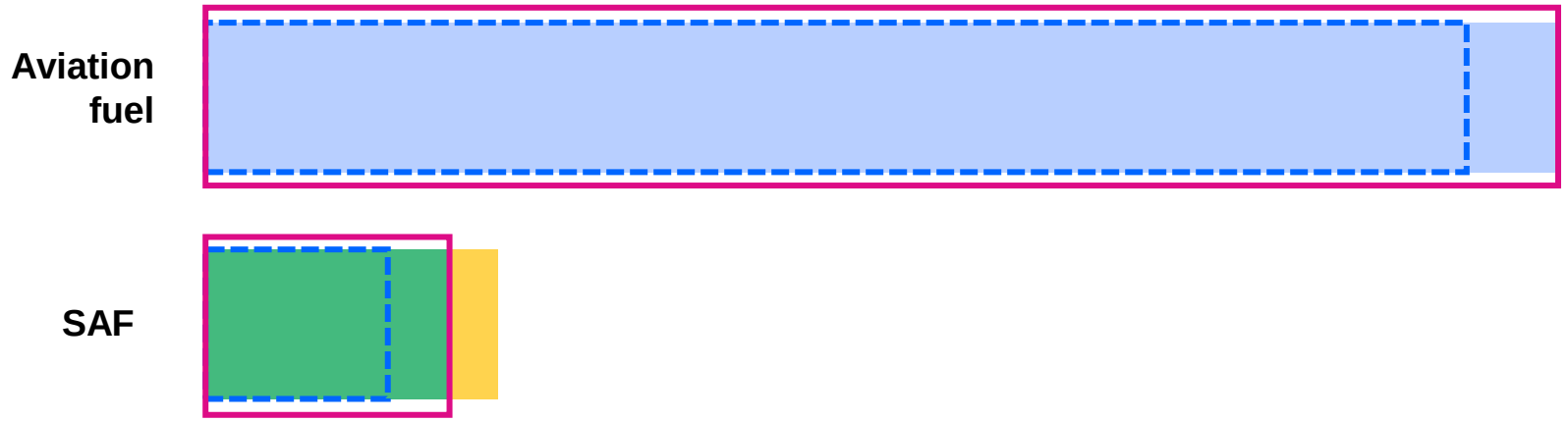
Voluntary SAF (not counting towards mandate)

SAF supplied at UA (towards mandate)

Total

Supplied to AOs in scope

An aviation fuel supplier supplies:



UA = Union Airport
AO = Aircraft operator

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Clarification of key aspects impacting the reporting obligations

Fuel supplied ‘to’ vs. ‘at’ Union airports

Voluntary SAF amounts & totals

Aviation fuel properties

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Aviation fuel properties

Aviation fuel properties, including:

- *mass, volume,*
- *aromatics and naphthalenes content* in % v.v, and
- *sulphur content* in % m.m

should be provided per batch, per Union airport and at Union level, as per Article 10 d)

Note that the **energy content** and the **Hydrogen to Carbon ratio may be, on a voluntary basis**, reported by the aviation fuel supplier together with the other properties requested by RFEUA. This is due to the relevance of this parameter to the non-CO_2 reporting under the EU ETS non-CO_2 MRV, though it is not mandatory under RFEUA.

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Aviation fuel properties

The reported aviation fuel properties may be obtained from one of the following D**etermination methods**:

- **Measured values at origin**
- **Calculated values at pre-airport**
- **Measured values at pre-airport**

In all cases, in addition to the calculated or measured data, the following information should be reported:

- **the batch reference** that enables traceability (e.g. an internal registry entry, CoA reference, or similar identifier); and
- **the mass and volume of the batch delivered to the airport** by the aviation fuel supplier. **Note AFS shouldn't use* standard density values for conversion of this data.**

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

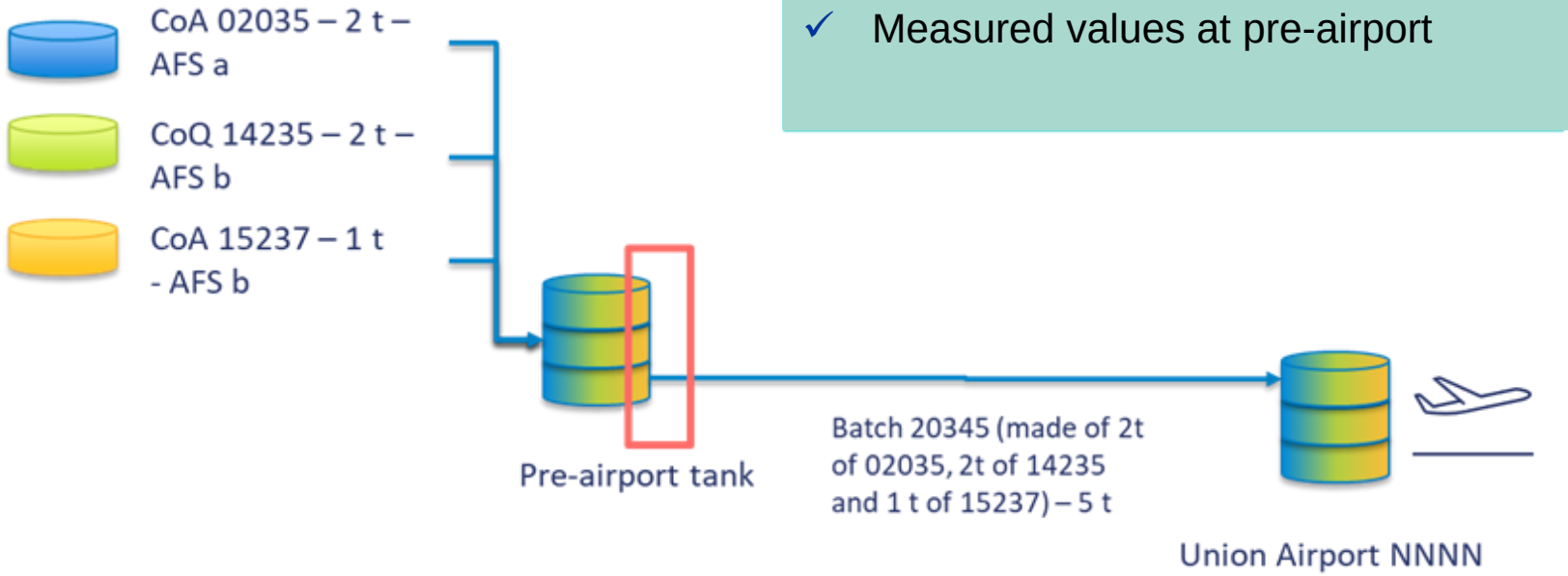
Examples illustrating differences in supply points

Case 1: Aviation fuel supplied directly to a Union airport depot or from a pre-airport storage tank containing traceable batches

→ **Simple chain** (limited or no blending of different batches before reaching the airport fuel farm, traceable to origin)

Determination Methods applicable

- ✓ Measured values at origin
- ✓ Calculated values at pre-airport
- ✓ Measured values at pre-airport



The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Examples illustrating differences in supply points

Case 2: Fuel Supplied indirectly to a Union airport (e.g. via comingled distribution system)

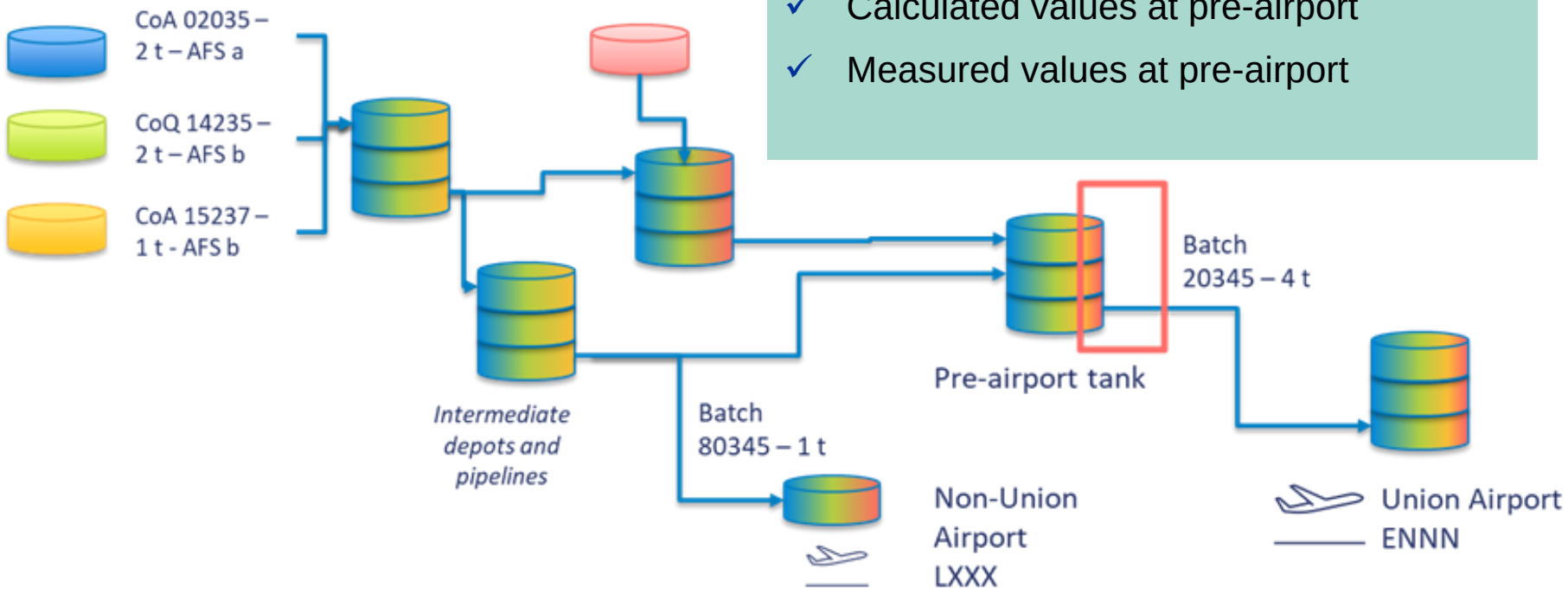
→ **Complex or commingled** (traceability to origin not feasible)

Determination Methods applicable

X Measured values at origin

✓ Calculated values at pre-airport

✓ Measured values at pre-airport



The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

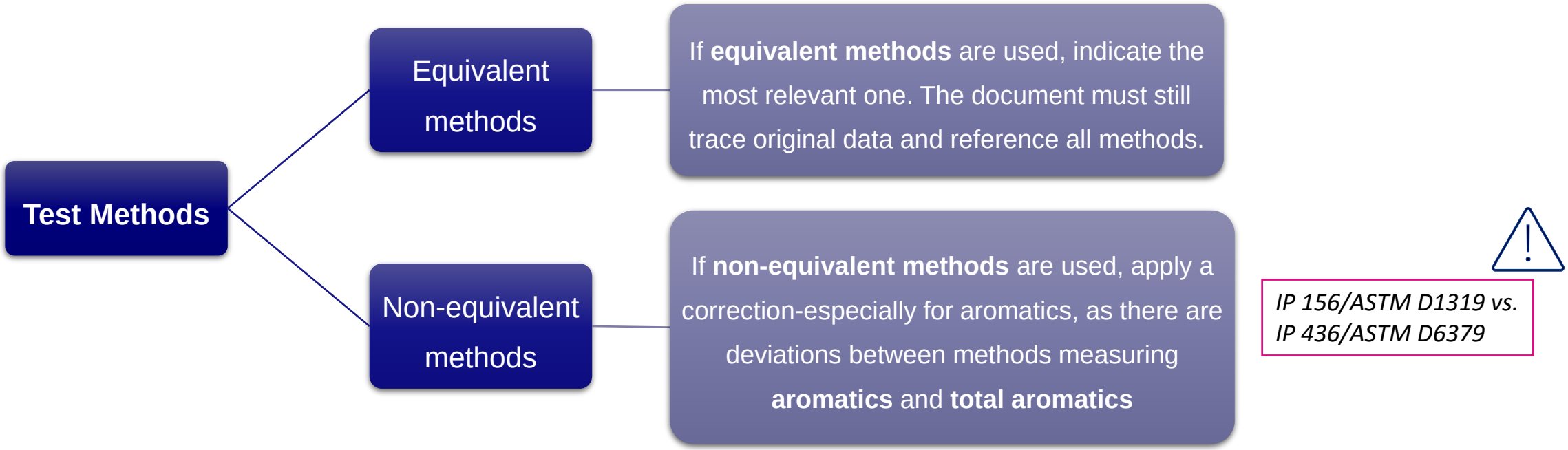
Reference methods for calculating aviation fuel properties

Sulphur, naphthalenes, and aromatics	**Method: Weighted averages of the individual batches' linear properties**: When comingling multiple batches within a tank the resulting values can be calculated as weighted averages of the contributing batch properties (**direct calculation**)
Energy content (*optional*)	**Method: Weighted average of the individual batches' energy contents**: 1. calculate the energy content of each individual batch received in the tank, 2. calculate the energy content of the resulting batch as a weighted average of those individual values. **Method: Property-based calculation**: 1. calculate the weighted average of all relevant properties included in the ASTM D3338 formula (aromatics, density, volatility, and sulphur). 2. Apply the ASTM D3338 Formula for Net Heat of Combustion to these weighted averaged values to calculate the energy content of the resulting batch.

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Reference methods for calculating aviation fuel properties

Test Method: In cases where values are calculated, data for a given property may be derived from different test methods, but only one should be reported per property.



The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

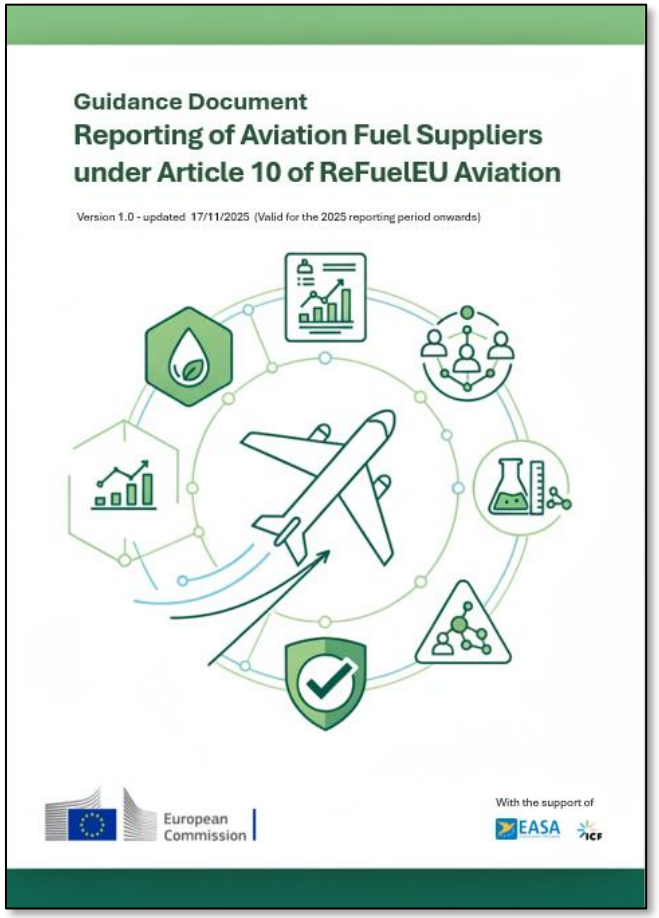
Brief presentation of Reporting Template A

Reporting of SAF and aviation fuel (Article 10 a, b, c, e)

Brief presentation of Reporting Template B

Reporting of aviation fuel properties (Article 10 d)

The Guidance document and the ‚worked example' files provide examples on how to complete Templates A and B



Reporting of batches of SAF supplied at Union airports (as per Article 10 (b), (c), (e))

Name of Union Airport *Enter the name of the Union Airport where the SAF is supplied at and marked for final consumption (as usually indicated on the PoS or similar documentary evidence).* *Refer to the official list of Union airports linked in note (3) under '0. Instructions'.*	ICAO code of Union Airport *Enter the ICAO code of the Union Airport where the SAF is supplied at and marked for final consumption (as usually indicated on the PoS or similar documentary evidence).* *Please note that you need to enter the ICAO code, which is different from the IATA code.* *Refer to the official list of Union airports.*	Date of batch delivery at Union Airport *Indicate the date on which the batch of SAF is supplied at the Union Airport and where it is marked for final consumption (as usually indicated on the PoS or similar documentary evidence).* *Indicate the date in the format [dd/mm/yyyy].*	Batch number *Indicate the unique code that allows to identify and trace the batch of SAF. Usually the identifier in the relevant documentary evidence, such as the Unique Number on the Proof of Sustainability.*	Type of documentary evidence *Select the type of documentary evidence that demonstrates the compliance of the batch of SAF with the relevant sustainability and GHG emissions savings criteria (e.g., Proof of Sustainability document, Proof of Compliance document).*
Alghero	LIEA	01.01.2025	POS-4569845-001	PoS
Alghero	LIEA	16.01.2025	POS-4569845-002	PoS
Alicante	LEAL	31.01.2025	POS-4569845-003	PoS
Alicante	LEAL	15.02.2025	POS-4569845-004	PoS
Asturias	LEAS	02.03.2025	POS-4569845-005	PoS
Asturias	LEAS	17.03.2025	POS-4569845-006	PoS
Barcelona	LEBL	01.04.2025	POS-4569845-007	PoS
Barcelona	LEBL	16.04.2025	POS-4569845-008	PoS
Bari	LIBD	01.05.2025	POS-4569845-009	PoS
Bari	LIBD	16.05.2025	POS-4569845-010	PoS
Faro	LPFR	31.05.2025	POS-4569845-011	PoS
Faro	LPFR	20.02.2025	POS-4569845-012	PoS
Firenze-Peretola	LIRQ	07.03.2025	POS-4569845-013	PoS
Firenze-Peretola	LIRQ	22.03.2025	POS-4569845-014	PoS
Firenze-Peretola	LIRQ	06.04.2025	POS-4569845-015	PoS
Firenze-Peretola	LIRQ	21.04.2025	POS-4569845-016	PoS
Firenze-Peretola	LIRQ	06.05.2025	POS-4569845-017	PoS

Available on the European Commission's ReFuelEU webpage: [ReFuelEU aviation - Mobility and Transport - European Commission]

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

How to upload Template A

The Reporting Template A, once filled out, should be uploaded to the European Commission's CIRCABC database. The aviation fuel supplier has access to their respective folder in the CIRCABC database via their UDB account. By uploading the completed Template A in CIRCABC, the aviation fuel supplier declares that all data submitted is accurate and complete.

How to name your completed Template A before upload to CIRCABC:

File names that are excessively long or contain spaces or special characters may cause issues during upload and should therefore be avoided. Before uploading the completed template, please name the file according to the following convention:

[YEAR]_A_[Unique NTR-ID of aviation fuel supplier].xlsx

where:

[YEAR] = Reporting period the template is completed for

[ID] = Unique VAT number of aviation fuel supplier

For example: 2025_A_ATU12345678.xlsx

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

How to upload Template B

How to name your completed Template B before upload to the UDB:

File names that are excessively long or contain spaces or special characters may cause issues during upload and should therefore be avoided. Before uploading the completed template, please name the file according to the following convention:

[YEAR]_B_[Unique NTR-ID of aviation fuel supplier].xlsx

where:

[YEAR] = Reporting period the template is completed for

[ID] = Unique VAT number of aviation fuel supplier, including country code

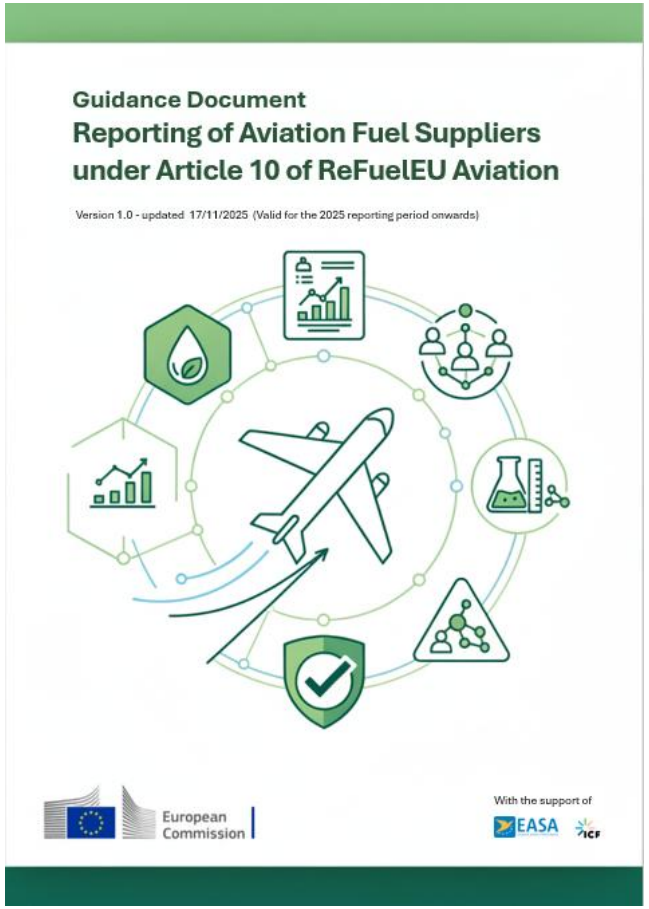
For example: 2025_B_ATU12345678.xlsx

Modifying or removing batches in the UDB after upload:

Note that you can modify or remove aviation fuel batches uploaded to the UDB using the EO_INTERNAL_REFERENCE number. It is thus advisable to ensure that this number is unique and traceable with regard to any relevant internal registry entries and related evidence.

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Where to find further information



ReFuelEU Aviation Regulation

Official Journal of the European Union

EN
Series L

2023/2405

31.10.2023

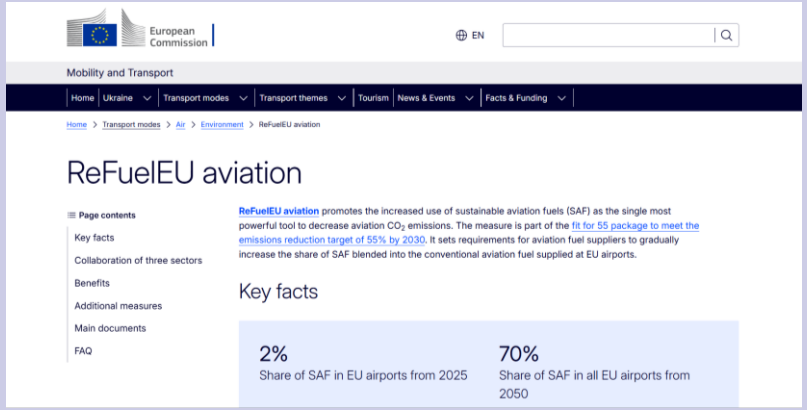
REGULATION (EU) 2023/2405 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 18 October 2023

on ensuring a level playing field for sustainable air transport (ReFuelEU Aviation)

(Text with EEA relevance)

ReFuelEU Aviation webpage



ReFuelEU Aviation FAQ

Frequently Asked Questions on the interpretation of certain provisions of Regulation (EU) 2023/2405 on ensuring a level playing field for sustainable air transport

The views expressed are purely those of the presenter and may not in any circumstances be regarded as stating an official position of the European Commission.

Fill in copyright information.

Thank you

© European Union 2025

Unless otherwise noted the reuse of this presentation is authorised under the CC BY 4.0 license. For any use or reproduction of elements that are not owned by the EU, permission may need to be sought directly from the respective right holders.

Slide xx: element concerned, source: e.g. Fotolia.com; Slide xx: element concerned, source: e.g. iStock.com