

Brussels, September 2025

## Sustainable Transport Investment Plan

### *Business & Science Poland position*

Despite tightening climate targets, current legislation is not delivering the necessary results in the transport industry. SAF mandates are increasing, but supply remains constrained and slow to scale due to high costs, uncertain investment conditions, and limited infrastructure. Certification rules and feedstock treatment remain inconsistent, and airport decarbonisation efforts are fragmented and underfunded. Gaps in multimodal connectivity limit efficiency especially at across cross-border corridors. These problems increase costs, slow deployment, and risk diverting traffic outside the EU. The Sustainable Transport Investment Plan must provide targeted investments into tools for the transport sector to decarbonise while supporting Europe's cohesion, connectivity and competitiveness.

We welcome the Commission's consultation on the Sustainable Transport Investment Plan (STIP) and its objectives. Europe's transport sector must decarbonise while continuing to provide reliable connectivity and support industrial competitiveness. This dual demand will not be met without a new approach. STIP can become the instrument that aligns investment with these goals, addressing gaps where current measures have fallen short.

#### **Key messages**

To meet the needs of the European transport sector, STIP must focus on lowering costs, unlocking investment, and ensuring fair participation across the aviation value chain. It should strengthen SAF supply, harmonise rules to reduce barriers, and enable balanced development across the Union. Therefore, Business & Science Poland (BSP) recommends the following:

1. Reduce the cost of SAF
2. Scale SAF supply and lower production costs with ETS funding and coherent rules
3. Facilitate fair access to SAF through EU book and claim
4. Ensure SAF supply and infrastructure are geographically balanced
5. Introduce measures that maintain a level playing field for EU carriers
6. Advance multimodality and mobility integration
7. Recognise airports as strategic energy hubs and provide support for investments in airport infrastructure for sustainable fuels
8. Strengthen aviation's role in Europe's growth and cohesion

The following pages elaborate on these recommendations in detail, using analysis and experience of transport sector pressures.

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## **1. Reduce the cost of SAF**

SAF remains several times the price of conventional jet fuel as the mandated share increases. Limited early supply, and in some cases additional charges not linked to the actual delivery of fuel, further widen the price gap. The purchase premium raises airline costs and weakens EU competitiveness. Affordability should therefore be a core objective of STIP if the scale up of SAF is to succeed.

To address this, STIP should lead to lower the price of SAF. Their production and purchases should be directly supported, and voluntary use above the mandate should be rewarded through exemptions from environmental and airport infrastructure charges. Transparency should be mandatory so that any fees reflect actual SAF volumes and can be verified with standard documentation. Contracts for difference shall be introduced in order to provide predictable supply, prices and unlock long term offtake. Taken together, these measures close the cost gap fairly and help preserve a level playing field for EU airlines.

## **2. Scale SAF supply and lower production costs with ETS funding and coherent rules**

Supply needs to expand rapidly and at lower cost, but producers face high capital requirements, exposure to volatile energy prices, limited feedstock availability and inconsistent legislation. This stops investment decisions, which keeps prices high and slows project delivery, while transport sector participants continue to face rising ETS compliance costs. Without predictable funding signals and coherent rules, investors will hold back and the market will not scale at the pace required.

Therefore, STIP should include a dedicated aviation track that earmarks ETS revenues for SAF and eSAF production, R&D, and airline decarbonisation measures such as fleet renewal. This should be paired with extension of the FEETS mechanism to 2050 and increasing the aviation allowance share to keep compliance costs manageable as mandates increase. Funding must stay pathway neutral while offering separate calls for alternative fuels, including bioSAF and eSAF to reflect different maturity and cost levels. To lower production costs, support should enable affordable access to clean electricity, sustainable biomass and other renewable and low carbon inputs, and should mobilise feedstocks for SAF. Targeted backing should help HEFA SAF scale quickly and allow first of a kind eSAF projects to proceed, complemented by the Innovation Fund and InvestEU to reach final investment decisions. Time limited flexibility should allow additional feedstocks, including a temporary allowance for selected crop based inputs with safeguards. Co processed RFNBO hydrogen used in jet and bioSAF should count in both RED III and ReFuelEU Aviation to ensure consistent recognition, both of which require a wider alignment. For eSAF production, the use of low carbon hydrogen that complies with the Delegated Act on Low Carbon Fuels should be allowed, together with the use of industrially captured CO<sub>2</sub> beyond 2041. Therefore, all renewable and low-carbon fuels technologies should receive equitable support under EU regulations.

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### **3. Facilitate fair access to SAF through EU book-and-claim**

Not all airports will have physical SAF available in the early years of ReFuelEU, which risks making compliance uneven and more costly for airlines depending on where they operate. At the same time, documentation requirements differ across Member States, adding administrative complexity and leaving room for charges that are not linked to actual fuel delivery. These gaps threaten the fairness and efficiency of the system and create uncertainty for both airlines and investors.

STIP should introduce a harmonised EU wide book-and-claim system. Airlines should be able to account for their use of SAF, and obligations should remain achievable regardless of the location of uplift. Standardised templates for sustainability certification and transfer documents should be adopted and recognised across the Union, reducing paperwork and improving transparency. Controls must ensure that any fees charged by suppliers are clearly linked to certified volumes of SAF. Together these measures will give airlines confidence that their compliance is recognised fairly and will lower administrative costs for both airlines and institutions.

Moreover, long-term, stable financial instruments shall be introduced. Such long-term financial instruments allow the offset of the so-called “green premium gap”, and ensure project bankability. For instance, mechanisms that guarantee revenue stability, such as Contracts for Difference (CfD), are essential. They provide investors with the certainty needed to secure debt financing and launch investments.

### **4. Ensure SAF supply and infrastructure are geographically balanced**

Most SAF production capacity today is concentrated in Western and Southern Europe, leaving Central and Eastern Europe with little or no access. This creates uneven compliance costs and limits the ability of airlines in those regions to meet obligations on equal terms. The lack of blending sites, storage, and transport corridors in many parts of the Union reinforces this imbalance and risks entrenching structural disadvantages between carriers.

A fair transition requires that production capacity and supporting infrastructure are spread more evenly across the Union. Revenues from the ETS should be directed to regions where facilities are missing, including ports and terminals, with support for blending plants, storage tanks, hydrant systems, and pipelines to be developed in parallel. Investment in transport corridors will also be essential to connect airports with suppliers and make supply reliable across borders. By prioritising a geographically balanced build out, STIP can reduce market distortions, strengthen energy security, and ensure that all airlines benefit equally from access to clean fuels.

Additionally, a common strategy defining the minimum level of aviation fuel stockpiles, SAF and eSAF, could encourage fuel producers to actively invest in this area. Support for storage infrastructure could also be envisaged for the modification of SAF-type aviation fuels to maintain their appropriate quality.

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## **5. Introduce measures that maintain a level playing field for EU carriers**

Airlines in Europe face rising costs from climate obligations, while competitors outside the Union are not bound by the same requirements. This imbalance threatens the competitiveness of EU carriers while also undermining connectivity and putting jobs at risk. The pressure is made worse by overlapping monitoring rules and reporting requirements, especially for non CO<sub>2</sub> emissions.

Protecting competitiveness while decarbonising requires a set of targeted adjustments. Monitoring and reporting should be simplified and streamlined to remove duplication and reduce the administrative burden. Airlines should have access to support for fleet renewal and efficiency upgrades, which both cut emissions and lower operating costs. Revenues raised from aviation should be recycled back into decarbonisation within the sector, showing a direct link between what airlines and airports contribute and the backing they receive. New fuel taxes, including on sustainable fuels, should be avoided during the scale-up phase to prevent further distortions. By keeping costs proportionate and linking climate action with competitiveness, STIP can maintain a fair playing field for EU airlines while delivering real progress towards climate goals.

## **6. Advance multimodality and mobility integration**

The TEN T framework was designed to build a unified internal market, but its implementation has focused mainly on rail while the contribution of aviation to intermodality has been undervalued. Gaps remain in cross border rail connections and in the integration of air links into multimodal corridors. Fragmented systems, missing links and complex procedures limit the benefits of connectivity and add costs for operators and passengers. Unless addressed, these gaps will weaken both cohesion and competitiveness across the Union.

STIP should back intermodal projects that improve the quality and availability of air connections within the TEN T network. Priority should go to multimodal hubs that link airports with high speed and regional rail, new cross border connections that close missing links, and integration tools such as through ticketing, common data standards and code sharing across modes. Financial instruments should be available for these projects and procedures kept simple so regulation acts as an enabler. Platforms like the Renewable and Low Carbon Fuel Alliance can help regulators and industry exchange information on innovation, while intermodal pilots can demonstrate how integrated mobility strengthens sustainability, enhances resilience and drives long term growth.

## **7. Recognise airports as strategic energy hubs and provide support for investments in airport infrastructure for sustainable fuels**

Airports are not only gateways for passengers but also critical nodes in Europe's energy and transport systems. They will have to adapt infrastructure for new fuel types as well as electrification. These

adaptations are costly and complex, and without dedicated support the potential of airports to drive the energy transition will remain underused while the wider aviation transition slows.

Recognising airports as strategic energy hubs, means supporting them to combine energy and transport functions. Pilots for hydrogen and SAF infrastructure, blending facilities, storage tanks, hydrant systems, and grid connections can show how airports can reduce emissions and strengthen energy resilience. Grant support would be particularly advisable for the area of fixed and wheeled technical infrastructure for SAF and eSAF fuels, in particular in the form of financial incentives for the construction of new infrastructure and the adaptation of existing technical infrastructure for Owners and Managers (storage tanks, technical installations for aviation fuels, including hydrants for SAF, eSAF and distribution vehicles).

Support should also extend to electric mobility and technologies that stabilise electricity distribution networks, together with infrastructure for energy storage and on site generation that integrates with local grids. This should be matched by support for sustainable design and low emission technologies that reduce CO<sub>2</sub> in daily operations of airports, aircraft and rail. National measures such as tax incentives can reinforce EU programmes to make early projects viable. By developing airports as intelligent energy management hubs, Europe can demonstrate how aviation infrastructure enables both decarbonisation and wider energy security.

## **8. Strengthen aviation's role in Europe's growth and cohesion**

Aviation is one of Europe's strongest drivers of growth and regional balance, supporting millions of jobs and connecting markets and communities. To continue this role while meeting climate targets, the sector needs financial support that arrives on time and in the right form. If new instruments are delayed or poorly sequenced, investment will slow, costs will remain high, and the wider benefits of air connectivity for competitiveness and cohesion will be undermined.

Strengthening aviation's role means introducing new financing tools in a phased and predictable way, with tangible results before 2030 and a clear pathway through 2040. Milestones should be tracked against indicators such as SAF volumes delivered, airport infrastructure in place, and the cost gap with conventional fuel. Because aviation is a global sector, a global approach is more effective than fragmented regional action, so instruments should be harmonised with international initiatives. In particular, alignment with the ICAO path to net zero by 2050 should guide the design of EU measures. Transparent reporting will show that climate ambition is being turned into real outcomes while also sustaining aviation's contribution to jobs, GDP and regional cohesion. By linking timely financial support with clear economic and social gains, STIP can ensure that aviation remains both competitive and a cornerstone of Europe's integration.

## **About BSP**

*Business & Science Poland (BSP) combines the experience of leading Polish enterprises with the EU agenda. We represent the knowledge and interests of Polish companies employing over 180,000 people in Poland, the EU, and globally. Our goal is to support the EU Single Market in line with the need for its responsible and effective transformation. This opinion presents the position of BSP members representing the financial, air transport, fertiliser, chemical, mining, refining, fuel and energy sectors.*