BRIEFING

There is sufficient planned global SAF production to meet UK SAF Mandate targets

Analysis of Bloomberg data shows that there is a pipeline of SAF projects across the globe and within the UK with the capacity to meet the UK SAF Mandate targets in the 2020s.

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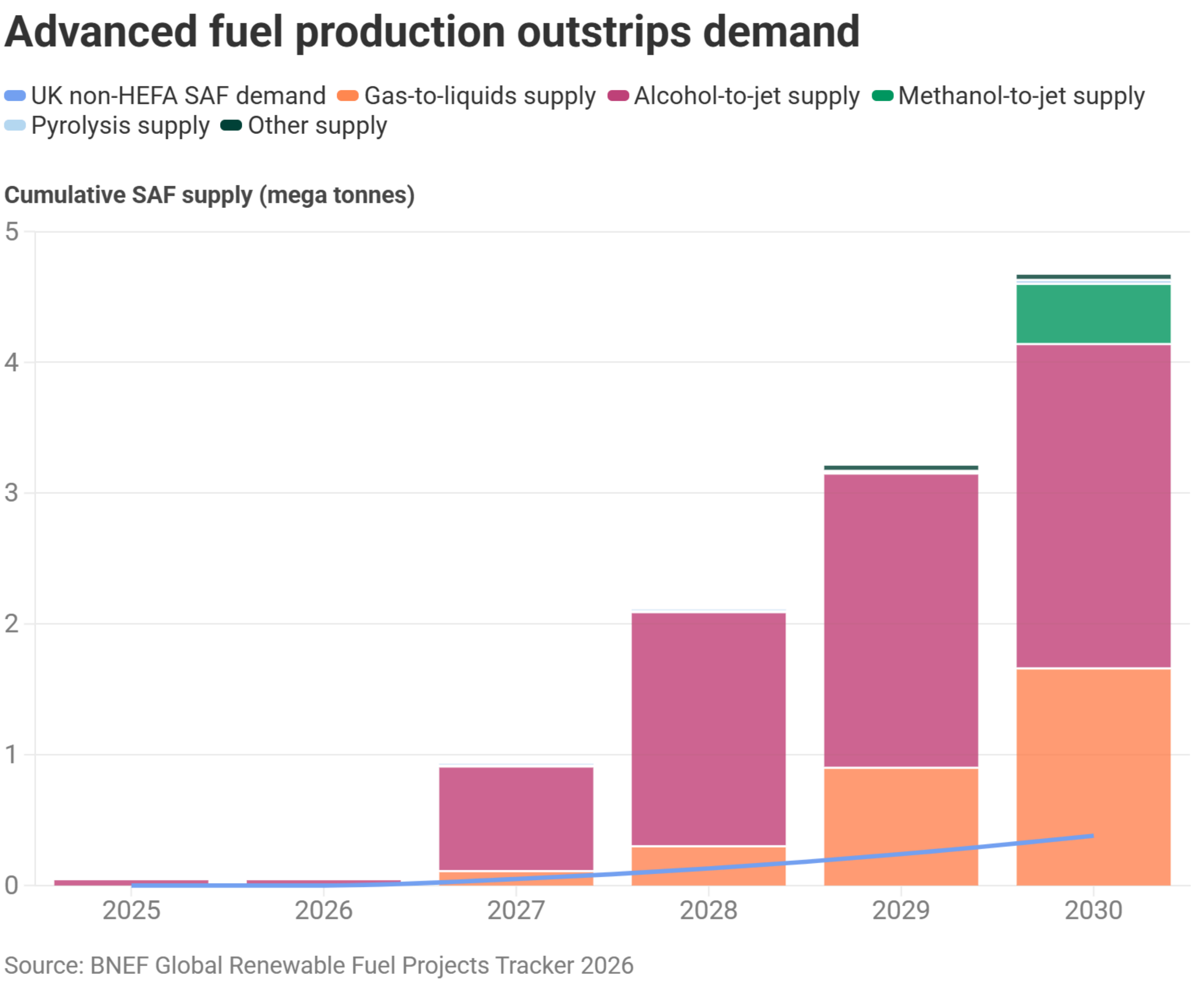
Executive Summary

Bloomberg's global advanced fuels production data suggests that even with increasing demand for SAF, there will be **sufficient supply to meet the UK Sustainable Aviation Fuel (SAF) Mandate targets** without needing to weaken its environmental criteria.

The Mandate is the UK's primary policy for cutting aviation emissions, and maintaining its integrity is crucial for unlocking domestic investment in sustainable aviation fuel production and meeting our climate targets. At its core, the Mandate provides a long term price signal that gives the UK a clear competitive advantage in securing future supply.



This new data rebuts calls by industry to allow imported crop-based biofuels - which have little to no emissions savings potential and drive environmental damage - into the scheme. They claim that this change is necessary to decarbonise the sector at the required pace, however weakening targets would undermine the business case for investing in advanced and e-SAF production in the UK.

Advanced fuels, and particularly e-fuels, should be prioritised as they **deliver the largest emissions savings and are fully scalable**, unlike other fuels that are reliant on constrained feedstocks (like used cooking oil or animal fat) and compete with food (like crop based biofuels). E-SAF can be produced domestically, offering energy and national security benefits by reducing reliance on volatile global fossil fuel markets.

Recent calls for evidence on the SAF Mandate risk critically undermining progress and confidence for investors. Unnecessary and short-sighted changes to policy could cause investment to flow abroad to regions with more stable and predictable regulation, which will jeopardise the UK's economic advantage.

The UK Government can best support advanced fuel production by:

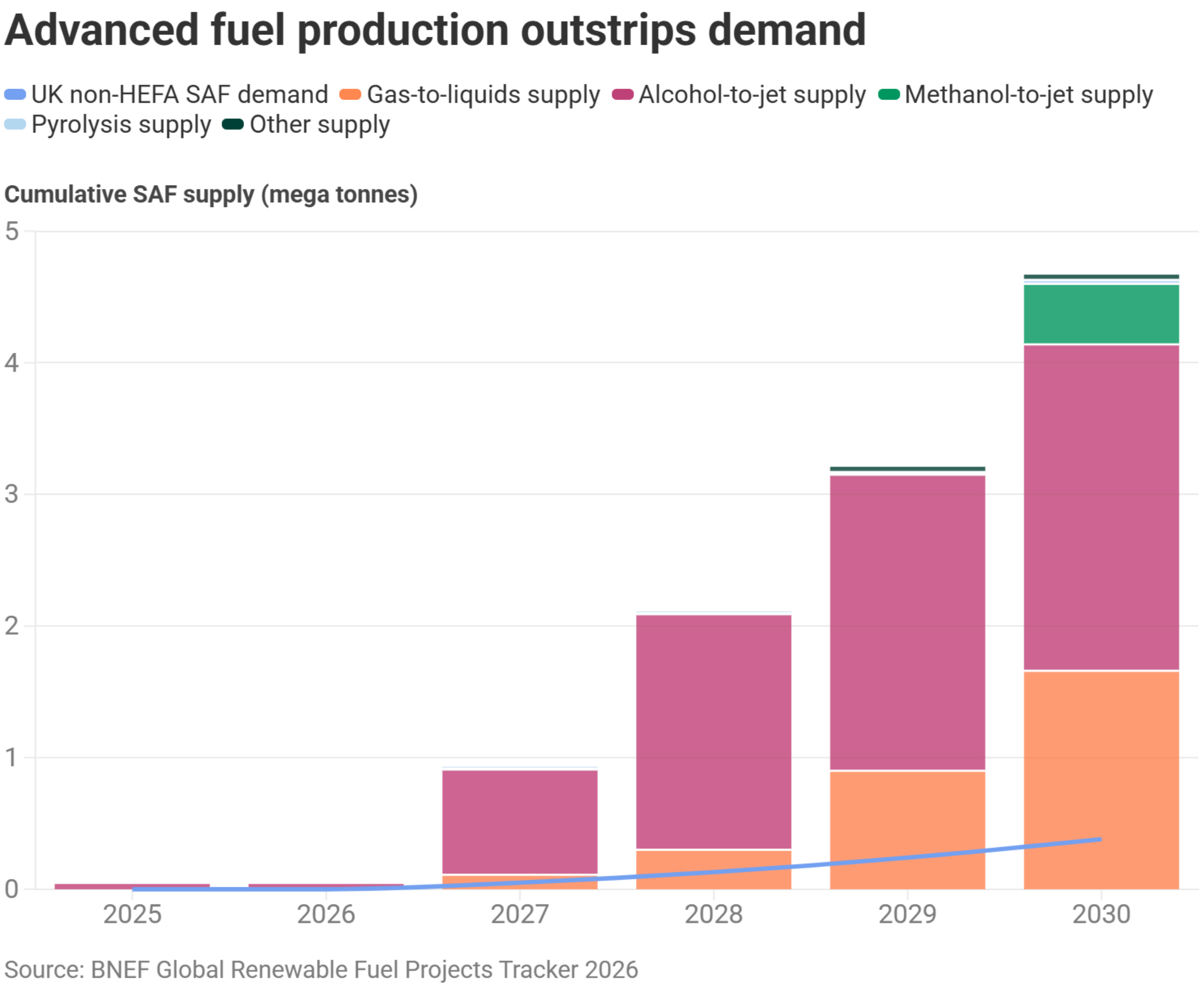
1. **Maintaining the current advanced and e-SAF targets within the SAF Mandate** - altering targets would undermine investor confidence and jeopardise long-term capital investment which is vital for market certainty.
2. **Delivering the revenue certainty mechanism without further delay** - this is essential to remove financial risk and secure bank backing, allowing SAF projects to reach final investment decisions in time to meet 2030s mandate demands.
3. **Ensure a separate funding stream within the revenue certainty mechanism for e-SAF** - this will shield e-SAF projects from being undercut by less effective biofuels and ensure targeted support to scale this nascent technology.

01. Global advanced fuel production

New data highlights considerable global advanced fuel capability

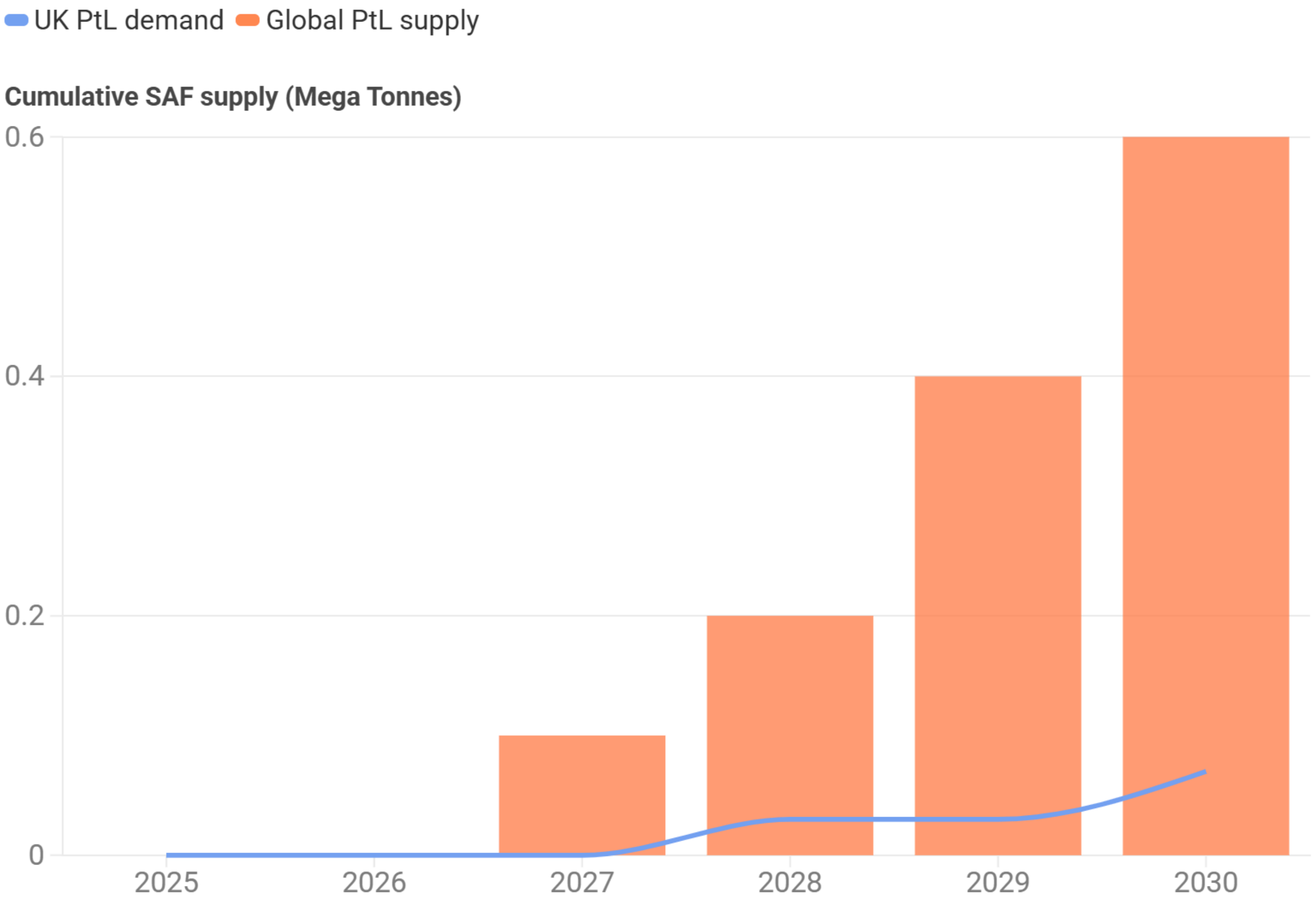
Recent data from BloombergNEF shows that global advanced fuels production could outstrip UK demand in the late 2020s.

As shown below, BNEF estimates that global advanced fuels production could reach roughly **4.7 mega tonnes** by 2030, a volume that vastly exceeds the total requirements of the UK SAF Mandate of 0.38 mega tonnes.



Crucially, the data also shows (below) that by 2030 over **0.63 mega tonnes** of e-SAF will be produced across the globe, also surpassing the sub-target requirements set out in the SAF Mandate which requires 0.07 mega tonnes.

Global PtL supply will surpass UK demand



Source: BNEF Global Renewable Fuel Projects Tracker 2026

This analysis shows that only a small fraction of global advanced biofuel and e-fuel production is needed to meet the UK SAF mandate. This undermines arguments made by some airlines and fuel suppliers, who suggest that to ensure SAF mandate targets can be met, the Government should weaken the environmental principles of the SAF Mandate by allowing imported crop-based biofuels into the scheme.

The UK is well placed to access this global supply

The UK is in a strong position to access the necessary volumes of global advanced SAF through the 2020s, due in part to the specific design of the UK SAF Mandate. By including advanced and e-SAF targets alongside a strict cap on HEFA-SAF, the UK has created a long-term demand signal for global fuel suppliers. This regulatory certainty acts as a competitive advantage, incentivising suppliers to prioritise the UK market over others. Many other "mandates" only contain indicative targets and do not have the same robust and effective penalties.

The SAF Mandate demand signal is crucial because it differentiates the UK market from regions with less ambitious or mature frameworks. With the HEFA cap progressively tightening and dedicated sub-targets for advanced fuels and e-SAF in place, fuel suppliers are incentivised to direct their advanced fuel production to the UK. This creates a predictable market environment where producers can secure their investment returns, ensuring that the UK can attract the necessary supply of non-HEFA fuels - such as those derived from municipal solid waste or renewable electricity - to meet its mandate targets throughout the 2020s.

As T&E's recent briefing shows, crop-based biofuels have incredibly limited to no emissions saving potential and depending on where and how they are grown can be hugely damaging for the environment. Allowing crop based biofuels into the SAF mandate or weakening or delaying advanced SAF or e-fuels targets would severely undermine the business case for investing in advanced and e-SAF production in the UK and risk rendering ineffective the only enacted policy to drive down aviation emissions.

02. Protecting the SAF Mandate

Keeping strong SAF targets is crucial

The SAF mandate is currently the only policy in place to cut emissions from aviation. With international and domestic aviation accounting for around 8% of the UK's carbon emissions - and expected to rise year on year whilst other sectors decarbonise more quickly - the Government cannot afford to stall on solutions that are best aligned with the delivery of its climate targets. In a scenario where crops are allowed in the SAF mandate, fuels delivering higher emissions will simply flow to more ambitious markets (like the EU which would then have more robust regulation) - a trend we have seen in other sectors post-Brexit, such as chemical manufacturing. This is because the fuel industry and airlines will use the lowest cost feedstock to comply and if allowed in the SAF Mandate, this will be crop based biofuels despite their limited to non-existent emission savings. This is why advanced SAF, and in particular e-fuels which deliver the largest emissions savings, should continue to be prioritised in the UK SAF mandate and as part of the UK's wider strategy to decarbonise aviation.

Advanced fuels can be produced in the UK delivering energy and national security benefits. The 2026 oil crisis has had a profound effect on global aviation, with significant jet fuel shortages and surging prices. Decoupling our aviation fuel supply from global supply chains and therefore unexpected global shocks is crucial to protect consumers from price spikes and ensure a stable supply. This is particularly crucial in the case of potential future conflict.

Scaling up advanced fuel production, particularly of e-fuels which only require renewable energy infrastructure (such as solar or wind) and a carbon source and can be scaled rapidly across the UK, are crucial for weaning the UK off volatile imported kerosene. Prioritising and ensuring domestic production is crucial to ensure stable and predictable supply, shielding the UK from the impacts of global geopolitics.

Only e-fuels are fully scalable as they don't rely on limited feedstocks with competing uses. Non advanced SAF such as HEFA (hydroprocessed esters and fatty acids) is reliant on used cooking oil and animal fat, which is a highly constrained feedstock and is reliant on a high level of imports. There is increasing global competition for these feedstocks and relying on them in the long term will not meet global aviation demand without causing deforestation or competing with agriculture. Advanced biofuel pathways such as municipal solid waste however, can utilise a wider available feedstock pool by processing materials like household rubbish, agricultural residues, and industrial gases via gasification or pyrolysis, however these still remain constrained by limited supply and competing uses for example for energy generation. E-SAF is uniquely placed as a long term solution as the only fuel type which is not constrained by feedstock limits as it relies on abundant renewable energy.

Advanced fuels mitigate conflicts with land use.
While pathways such as crop based SAF and HEFA rely heavily on agricultural land and constrained waste-oil supplies, advanced fuels (particularly e-SAF) break the link between aviation decarbonisation and arable land use. Because they don't require agricultural crops (like soy, corn, or palm), they ensure that global food production is not displaced, protecting against spikes in global food prices. This also helps prevent deforestation which can happen when the demand for land-intensive crop-based biofuels surges or as a result of HEFA fraud.

The UK Government has also acknowledged via its SAF Mandate consultation response that e-SAF fuels have 'high GHG emissions reduction potential and low risk of environmental impacts including land use change ' as compared to SAF produced through other pathways. It must therefore act on this acknowledgement and unlock the potential of e-SAF moving forward.

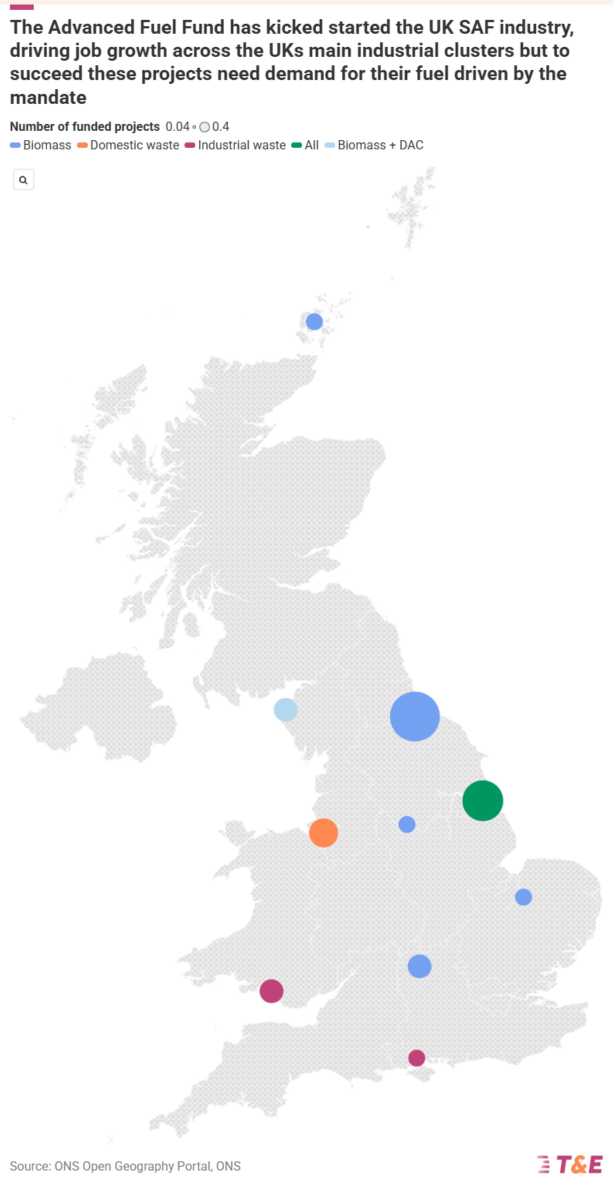
Changing the SAF Mandate now would send the wrong signal for investors

To date, the UK has been a key driver in driving the uptake of alternative fuels through the introduction of the SAF Mandate, providing funding via the Advanced Fuels Fund and the planned introduction of the revenue certainty mechanism (RCM). However, this progress risks being critically undermined if the certainty of these measures is replaced by premature regulatory change and uncertainty over the SAF Mandate's future.

On December 22 2025, the UK Government launched a [Call for Evidence](#) on whether to allow crop based biofuels within the SAF Mandate. In May 2026, the UK Government announced that it would be putting forward a Call for Evidence on the SAF Mandate. It suggested that this would focus on potential supply uncertainty and whether the mandate should be more flexible.

This has already sent a worrying signal to investors. Any changes to a key regulation like the SAF Mandate - which was designed to establish a market for a nascent technology and was only implemented last year - would have significant implications for how investors view the UK for stable green investment across the sector. Investors will instead invest in regions with a predictable regulatory regime where the risk of stranded assets is lower than the UK. This will leave the UK behind in a rapidly growing global market and risk the UK leadership faltering in fuel technology, which will be the basis of decarbonising aviation globally.

E-SAF scale up can significantly benefit the UK economy



According to a [recent report by ERM](#), meeting the 2040 Power to Liquid (e-SAF) sub target with domestic production has the potential to generate:

- More than £12 billion in gross value added during construction phase + £900 million / year once production is operational
- Nearly 3,000 long-term jobs and 10,000 jobs during construction of the SAF plant (H2 and CO2 supply with SAF processing) with thousands more jobs coming from the construction of the renewable power needed to produce H2 and supply the SAF plant.

These jobs would be created in some of the most deprived regions in the UK, supporting the Government's targets on [job creation and upskilling](#) across the country.

03. Government Support

How the UK Government can support advanced fuel production and protect SAF supply

Rather than weaken its own legislation, the Government should focus on unlocking domestic production of e-SAF. Many projects that could produce these fuels are unable to secure the funding and approval needed for them to reach Final Investment Decision, and many are currently stalled due to delays in implementing the Revenue Certainty Mechanism.

The Government can support the sector in meeting SAF Mandate targets in several key ways. Firstly, by maintaining the current targets on advanced and e-fuels in the SAF mandate. Secondly, by delivering the UK revenue certainty mechanism without further delay. Thirdly, ensuring that the mechanism has a specific ringfenced funding stream for e-SAF. Changing the direction of the UK SAF Mandate now would only continue to keep these fuels from being produced due to the regulatory uncertainty caused by unexpected and unwarranted policy change.

04. Policy Recommendations

01 Maintain the current advanced and e-SAF targets within the SAF Mandate - Keeping current targets stable is vital for maintaining market certainty. Because e-SAF production requires long term capital investment, changing the policy now would undermine investor confidence and put UK e-SAF production at risk.

02 Deliver to revenue certainty mechanism without further delay - The lack of a price guarantee for investors creates a financial risk that reduces the desire for further investment. Implementing this mechanism immediately establishes the market certainty required for banks to de-risk investments, allowing projects to move towards final investment decisions in time to meet growing SAF mandate demand in the 2030s.

03 Ensure a separate funding stream within the revenue certainty mechanism for e-SAF - This is essential to shield e-SAF from being undercut by less effective biofuels. E-SAF currently faces significantly higher capital and production costs, so carving out a distinct pot guarantees that targeted price support is explicitly reserved to de-risk and scale e-SAF projects.

04 Do not allow crop-based biofuel into the SAF Mandate - Allowing crop-based biofuels into the mandate would undercut the development of sustainable and scalable alternatives like advanced waste-based biofuels and e-SAF. Diverting agricultural land to fuel plane engines instead of growing food drives deforestation, accelerates biodiversity loss, and triggers high indirect land-use change emissions that can ultimately make these crops worse for the climate than fossil jet fuel.

05 Invest in UK domestic production of SAF to move away from reliance on imports - By developing homegrown production facilities through mechanisms like the Low Carbon Fuels Fund and a robust Revenue Certainty Mechanism, the UK can directly control its clean energy supply chain. Building a domestic SAF industry secures UK fuel resilience and creates thousands of high-skilled green jobs across the country.

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