

**To the Chair and Members of the Standing Committee on Infrastructure and Water Management
House of Representatives of the Netherlands**

**Subject: Written contribution to the round-table discussion on Sustainable Aviation Fuel (SAF), 4
November 2026**

Dear Chair and Members of the Committee,

Thank you for the opportunity to contribute to the round-table discussion on Sustainable Aviation Fuel (SAF) on 4 November 2026. On behalf of Vitol, I am pleased to submit our views for the Committee's consideration.

In our view, scaling up SAF requires three mutually reinforcing conditions: regulatory certainty, the effective use and development of existing infrastructure, and resilient supply chains. Together, these conditions can help translate Europe's aviation decarbonisation ambitions into reliable and increasingly affordable SAF supplies.

Regulatory certainty to support investment and supply

As a jet fuel supplier, we understand regulatory certainty to mean clear, consistent and predictable rules that enable us—and the producers from whom we purchase—to make long-term investments and supply commitments. ReFuelEU Aviation provides an important long-term demand signal. Delivering its targets, however, also requires confidence in the rules governing feedstock eligibility, emissions accounting, financial incentives and enforcement, both across Europe and here in the Netherlands.

Making effective use of existing infrastructure

Scaling up SAF requires more than investment in new production facilities and mandates to stimulate demand. It also requires the efficient use of existing refining, storage and distribution infrastructure, including NATO's Central Europe Pipeline System (CEPS).

The current Dutch application of mass-balance rules prohibits SAF supplied through CEPS to be recognised at Schiphol. This has significant implications given the Netherlands' position as a major gateway for European aviation fuel. Approximately 4.5 billion litres of jet fuel pass through the Dutch section of CEPS annually- equivalent to around one-third of the network's reported jet fuel volume, yet no SAF molecule through CEPS is claimed at Schiphol.

Neighbouring Member States apply mass-balance and certification rules that allow SAF transported through the same infrastructure to receive recognition. The resulting differences create uncertainty for cross-border supply and risk placing deliveries to Dutch airports at a disadvantage.

The obstacle is therefore not the physical ability of CEPS to transport appropriately blended and certified SAF, but the administrative conditions governing its recognition. Once blended and certified to the applicable jet fuel specification, SAF is a drop-in fuel compatible with existing distribution infrastructure. Its use should not depend on tracing the biogenic molecules via C14 testing to a particular aircraft, but on a robust and auditable system of certification, mass

balancing and attribution. The objective should be to uphold environmental integrity while enabling—not inadvertently impeding—the expansion of SAF.

Preserving industrial capability and building resilient supply chains

The Netherlands is one of Europe's principal refining and logistics hubs. This position provides a strong foundation for securing aviation fuel supplies today while developing the sustainable fuels needed for the future.

As SAF production expands, aviation will continue to require substantial volumes of conventional jet fuel. European refineries remain essential to meeting that demand and maintaining continuity of supply. According to FuelsEurope, Europe's net dependence on jet fuel imports is approximately 34%¹ of demand, highlighting the exposure that further losses of domestic refining capacity could create.

Existing refinery sites also offer infrastructure, utilities, processing capabilities and skilled workforces that can support conversion to biorefineries, the integration of dedicated renewable fuel units or the co-processing of sustainable feedstocks.

The availability of suitable renewable feedstocks within the EU is limited. Subject to applicable certification rules, imported feedstocks can be processed in Dutch refineries, just as imported crude oil is processed today. This would enable the Netherlands to build on its refining expertise and logistics infrastructure while retaining industrial activity, skilled employment and economic value domestically.

This approach would not eliminate import dependence or feedstock risks, but would strengthen resilience through diversified sourcing, reliable supply arrangements and domestic processing. Strategic autonomy should mean reducing supply-chain vulnerabilities—not requiring every input to originate within Europe.

Europe's refineries should therefore be recognised both as suppliers of today's conventional jet fuel and as important platforms for tomorrow's SAF production. Preserving and transforming these assets, alongside investment in storage, distribution and diversified sourcing, can help secure aviation fuel supplies, lower the cost of scaling SAF and strengthen Europe's ability to withstand disruption. Refining competitiveness, aviation decarbonisation and energy security should be treated as mutually reinforcing policy objectives.

Recommendations to the Committee

- (1) Support a predictable and proportionate regulatory framework, with clear guidance and rules; in particular the alignment of Dutch mass-balance, certification and SAF-attribution with workable approaches elsewhere in the EU, including for CEPS deliveries and fuels produced via co-processing of sustainable feedstocks;
- (2) Recognise the integrated economics of conventional and renewable-fuel production when shaping investment policy.
- (3) Supporting the development of resilient supply chains through diversified, sustainability-compliant sourcing, domestic processing capability, adequate storage and blending capacity, and access to alternative distribution routes.

Together, these measures would help Dutch Airports and suppliers fulfil their ReFuelEU Aviation obligations while strengthening its position as a competitive, reliable and increasingly sustainable aviation fuel hub.

James Stride, Aviation Manager, Vitol
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¹ <https://fuelseurope.eu/uploads/medias/6aa3c2ca88d10.pdf>