

This document is part of the tender material for the tender of an aid scheme for sustainable aviation fuels (SAF) in domestic aviation.

For more information, please visit  
<https://www.trafikstyrelsen.dk/ar-bejdsomraader/luftfart/puljer/aid-scheme-for-sustainable-aviation-fuels-saf-in-domestic-aviation-in-2025-2027->

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Appendix A

Date: 11-08-2025

Version 2

## Appendix A: Description of the aid scheme

This appendix describes the aid scheme being offered under the competitive tender procedure. The purpose of this appendix is to outline the structure and conditions of the aid scheme that is the subject of the competitive tender procedure. The method for selection of winning bids and the competitive process are set out in the *Tender Specifications* document.

### 1. National legal basis and budget

The national legal basis for the aid scheme is the *Order on the competitive tendering of an aid scheme for sustainable aviation fuels (SAF) in domestic aviation* of 03 July 2025 (in Danish: Bekendtgørelse nr. 1010 om konkurrenceudsættelse af støtteordning til grønne flybrændstoffer (SAF) i indenrigsluftfarten af 3. juli 2025). The Order will be issued in Danish. However, an unofficial English translation is available for the tenderers in *Appendix B*.

The budget for this scheme amounts to DKK 186,200,000 (2025 prices). The table below sets out the annual budget caps:

| Year                          | 2025       | 2026       | 2027       |
|-------------------------------|------------|------------|------------|
| Budget cap (DKK, 2025 prices) | 21,250,000 | 83,000,000 | 81,950,000 |

### 2. Detailed description of the aid scheme

The Beneficiary or Beneficiaries under the scheme will be airlines operating a Domestic Air Route in Denmark in the Aid Period as described in this appendix and who has been awarded aid under the competitive tender procedure as further described in the *Tender Specifications*.

Aid will be given to cover the airlines additional cost of operating domestic flights using sustainable aviation fuels (SAF) instead of fossil aviation fuels. The aid does not cover the full cost of SAF.

The aid is not limited to the direct price difference between SAF and fossil fuel but may also cover other additional costs incurred by airlines when using SAF. These may include costs



related to fuel infrastructure, blending and transport, which can differ from those associated with conventional fuel. The required aid may also reflect higher unit costs where airlines procure SAF with a higher share of neat (unblended) fuel. It should however also be noted that the use of SAF may lead to increased revenue for airlines by attracting more customers, as the green profile of the operation can have marketing value and commercial appeal. This may, in turn, help lower the overall net cost of operating on SAF and hence the required aid.

Not all operations on the route in question needs to be included in the bid, but aid will only be granted within a limit of the committed number of monthly sustainable operations.

The details of the aid scheme will be described below together with relevant requirements.

### *2.1 Aid Period*

The Aid Period shall commence from the date of grant following the competitive tendering procedure and will conclude on 31 December 2027. The first eligible operation under the aid scheme is expected to be carried out no later than 30 April 2026.

Should an ASTM International standard for SAF<sup>1</sup> allowing blends above 50 per cent be approved prior to 1 July 2026, the aid scheme will be suspended as of 31 December 2026 and a new tender may be issued for the year 2027. In such case, the previous winner(s) under this competitive tender procedure will not be eligible for aid in 2027 unless it/they are successful in the new tender.

If no such standard is approved by the specified date, the winner(s) of this initial competitive tender procedure shall remain eligible for aid for the entire duration of the Aid Period under the conditions set out in this tender material.

This mechanism is intended to enable the transition to higher SAF blend ratios if feasible.

### *2.2 Calculation of the aid*

The aid is granted as an amount in DKK per tonne of CO<sub>2</sub> reduced. No aid will be paid to cover any costs relating to VAT.

The baseline CO<sub>2</sub> emission when operating on conventional jet fuel is set at 72 g CO<sub>2</sub> per MJ. This baseline will be used to calculate the amount of CO<sub>2</sub> reduction eligible for aid under this scheme.

For all types of SAF, the CO<sub>2</sub> emission is assumed to be 0 g CO<sub>2</sub> per MJ.

The total aid awarded will thus be calculated as the price offered in the tender, referred to as "the offered price" (DKK per tonne of CO<sub>2</sub> reduced) multiplied by the total amount of CO<sub>2</sub> reduced through the Committed Operations. The amount of reduced CO<sub>2</sub> is determined by multiplying the SAF consumption (measured in MJ SAF) on Committed Operations by 72 g CO<sub>2</sub> per MJ.

### *2.3 Number of monthly Committed Operations*

In the tender, an airline commits to a number of sustainable operations per month to be performed under this scheme. These operations are referred to as the "Committed Operations".

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<sup>1</sup> ASTM International refers to SAF as "SATF" (Synthetic Aviation Turbine Fuels). SATF is covered by ASTM standard D7566.



The Committed Operations are required to be carried out during the Aid Period as set out in the tender.

The Committed Operations must be Scheduled Operations, and the Committed Operations must be served by aircrafts equipped with at least 10 passenger seats.

Not all operations on an Operator Route need to be included in the bid, but aid will only be granted within a limit of the committed number of monthly sustainable operations.

To take into account the fact that it can be very difficult to foresee the number of operations needed in a given month, a negative difference of up to 15 per cent is not regarded as "non-compliance".

If the airline performs less than 85 per cent of the Committed Operations in a month, the airline will not be entitled to any aid related to the reduced CO<sub>2</sub> from any of the Committed Operations that month.

**The aid grant will be annulled going forward if the airline does not perform at least 85 per cent of the Committed Operations per month at least four months out of a six-month period.**

*Example for illustrational purposes:*

If, for example, a winning airline has placed a bid to perform 150 monthly sustainable operations in May 2026, the airline will have to perform at least 128 sustainable operations that month.

If the airline performs less than 128 sustainable operations that month, the airline will not be entitled to aid regarding the reduced CO<sub>2</sub> from any of the sustainable operations in May 2026.

If the airline during the last six months has not performed according to their bid for January, February and May, the airline will altogether no longer be eligible for aid under the scheme (i.e., from June 2026 onwards).

In the case of force majeure events, dispensation will be given from the requirements. Force majeure events can be, but are not limited to, severe natural disasters, strikes, pandemic, epidemic, grounding of the aircraft type usually used on the route, closure of one of the airports on the route or the relevant airspace, introduction of restrictions in the relevant airspace or severe disruption of operations at the relevant airports. For a situation to be recognized as force majeure, the airline must be able to document that they could not have avoided the situation without disproportionate costs.

#### *2.4 Number of weekly Committed Operations*

The airline must perform a minimum of 20 one-way Committed Operations per week.

This requirement does not apply in 2025. For 2026, the following weeks are exempted from the requirement: 1-18, 20, 22, 42, 52 and 53. For 2027, the following weeks are exempted from the requirement: 53, 7, 8, 12, 13, 18, 20, 42, 51 and 52. Further, the airlines may



choose additional six weeks in 2026 and six weeks in 2027 to be exempted to allow for operational flexibility. Totalling 96 exempted weeks.

If the airline performs less than 20 Committed Operations per week, the airline will not be entitled to any aid related to the reduced CO<sub>2</sub> from any of the sustainable operations that week. However, the sustainable operations performed that week will still be included in the calculation of the committed number of sustainable operations that month (cf. above Section 2.3).

*Example for illustrational purposes:*

If, for example, a winning airline has placed a bid to perform 150 monthly sustainable operations in March 2026, the airline will have to perform at least 128 sustainable operations that month.

If the airline performs 18 sustainable operations the first week, and 40 sustainable operations in each of the remaining three weeks of March 2026, the total amount of sustainable operations is calculated as 138, and the airline will meet the committed number of sustainable operations that month and thus be eligible for aid that month.

However, the airline will not receive aid related to the 18 sustainable operations performed during the first week of March that were not in compliance with the minimum requirement of 20 sustainable operations per week.

Hence, the airline will only receive aid related to the 120 sustainable operations in the last three weeks of March 2026.

### *2.5 Refuelling for the Committed Operations*

The Committed Operations must physically be fuelled with an amount of SAF corresponding to the expected usage on the Committed Operation or any series of Committed Operations performed in succession. As a consequence, the refuelling for the Committed Operations must comply with the applicable requirements set out in table 1.



Table 1. Requirements regarding refuelling for Committed Operations

| Reference number | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>R-1</b>       | <p><i>The Committed Operations are required to be refuelled by at least 40 per cent SAF.</i></p> <p>Tenderers must specify the SAF share they commit to using on all the Committed Operations. The Committed SAF Share must be at least 40 per cent. Fuel uplifted for the Committed Operations must contain at least the Committed SAF Share. No aid will be granted for any fuel uplifted beyond the Committed SAF Share.</p> <p>The definition of SAF applicable under this scheme is set out in the <i>Tender Specifications</i> document.</p>  |
| <b>R-2</b>       | <p><i>When refuelling for a Committed Operation, all fuel added to the aircraft at that time must comply with the same requirements as if the fuel were intended solely for that Committed Operation.</i></p> <p>This applies regardless of whether the fuel is intended to cover only the Committed Operation or also one or more subsequent operations.</p> <p>Consequently, any fuel uplifted in connection with a Committed Operation must meet the minimum SAF blend percentage committed to in the tender (i.e. the Committed SAF Share).</p> |
| <b>R-3</b>       | <p><i>Refuelling must take place prior to take-off.</i></p> <p>The aircraft may have performed previous operation/s, provided that no additional refuelling occurs before the Committed Operation is carried out.</p> <p>This implies that an aircraft may be refuelled and subsequently carry out multiple Committed Operations in succession, without any further refuelling in between.</p>                                                                                                                                                      |
| <b>R-4</b>       | <p><i>The amount of fuel uplifted for at Committed Operation must at least correspond to the expected fuel consumption of the Committed Operation.</i></p>                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>R-5</b>       | <p><i>The aircraft may be refuelled for a Committed Operation without requiring the tank to be emptied.</i></p> <p>To allow for operational flexibility, it is accepted that the fuel used for the Committed Operation may be added to fuel already present in the aircraft from previous operations, which may not necessarily contain SAF.</p>                                                                                                                                                                                                    |

Notwithstanding the requirements specified in this section, the aircraft and the refuelling procedure must at all times comply with all applicable laws, regulations, and standards in force, irrespective of the provisions set out in this aid scheme. It is the sole responsibility of the airline to ensure compliance with both the obligations under this scheme and all relevant legal requirements.



### 3. Documentation requirements under the aid scheme

#### 3.1 Documentation of the planned start of operations on the route

Beneficiaries must submit documentation to the Danish Civil Aviation and Railway Authority confirming that they are planning to carry out the Committed Operations as described in their business plan submitted as part of the tender.

This documentation must be submitted halfway between the award of aid and the expected start date of operations.

**Failure to submit adequate documentation may result in withdrawal of the right to receive aid under the scheme.**

#### 3.2 Documentation for the Committed Operations

Beneficiaries must submit documentation to the Danish Civil Aviation and Railway Authority for the purpose of calculating the aid to be paid out. The documentation must be submitted no later than the 20<sup>th</sup> of the following month of the reporting period. The reporting period are determined by the Beneficiary and can be in the interval 1-3 months.

The documentation must contain the information described in table 2 and the template provided by the Danish Civil Aviation and Railway Authority must be used for the purpose. A mandatory template for the periodical reporting is provided in Appendix C of the Tender Specifications.

Table 2. Documentation to be submitted covering the reporting period

| Reference number | Information to be submitted                                                                                                                                                                                                                                                                                                                                          |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| I-1              | <i>The number of Committed Operations performed <u>per week</u> in the reporting period.</i>                                                                                                                                                                                                                                                                         |
| I-2              | <i>If the first and/or last week of the reporting period overlaps with a previous or subsequent month, the number of Committed Operations performed in each of those weeks must also be reported.</i><br>This in order for the Danish Civil Aviation and Railway Authority to assess whether the minimum threshold of 20 Committed Operations per week has been met. |
| I-3              | <i>The number of tonnes of CO<sub>2</sub> reduced <u>per week</u> in the reporting period.</i><br>If the first and/or last week of a reporting period overlaps with another reporting period, only the CO <sub>2</sub> reductions from operations carried out in the relevant reporting period may be counted.                                                       |



|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I-4</b> | <p><i>Documentation verifying that the fuel used for the Committed Operations qualifies as SAF, including proof of the actual SAF blending ratio.</i></p> <p>Beneficiaries must document that the SAF has in fact been uplifted onto the Committed Operations and that the blend used meets or exceeds the Committed SAF Share. This requirement can be fulfilled by submitting fuel receipts to the Danish Civil Aviation and Railway Authority.</p> <p>In addition, Beneficiaries must provide evidence that the fuel used qualifies as SAF. This can be documented by submitting a Proof of Sustainability (PoS) or equivalent documentation acceptable to the authority.</p> |
| <b>I-5</b> | <p><i>Documentation showing that the SAF was uplifted for the specific Committed Operations conducted in the reporting period must be committed.</i></p> <p>This documentation must include the volume of fuel uplifted, flight number, airline company, as well as the time and date of refuelling.</p> <p>This information may be shared with the Danish Energy Agency (Energistyrelsen) for the purpose of verifying that no double funding has occurred under overlapping support schemes.</p>                                                                                                                                                                               |

**In addition**, each Beneficiary must submit an annual statement issued by an independent certified auditor, covering all of the above information. The statement for the period up to and including 31 December 2026 must be submitted no later than 1 February 2027, and the statement for the 2027 calendar year must be submitted no later than 1 February 2028. A mandatory template for the two statements is provided in Appendix D of the Tender Specifications and can also be found on <https://www.trafikstyrelsen.dk/arbejdsomraader/luftfart/puljer/aid-scheme-for-sustainable-aviation-fuels-saf-in-domestic-aviation-in-2025-2027->.

## **4. Additional information and related requirements**

### *4.1 Suspension of payments under the scheme*

The Danish Civil Aviation and Railway Authority will suspend the award and/or payment of any aid under this scheme to any undertaking that has benefited from earlier unlawful aid declared incompatible by a Commission Decision (either as an individual aid or an aid under an aid scheme being declared incompatible), until that undertaking has reimbursed or paid into a blocked account the total amount of unlawful and incompatible aid and the corresponding recovery interest.

### *4.2 Repayment of unduly received aid*

Any aid amounts received unlawfully under this scheme, including amounts obtained in breach of the declarations made by the Beneficiary at the time of bidding, must be repaid to the Danish Civil Aviation and Railway Authority.

The Beneficiary is required to repay the amount claimed no later than 30 days from the date on which the repayment request is issued by the authority.



Any amount subject to repayment will accrue interest from the date of disbursement. The interest rate shall be calculated in accordance with the methodology set out in Chapter V of Commission Regulation (EC) No 794/2004, as amended, implementing Council Regulation (EU) 2015/1589 on the application of Article 108 of the Treaty on the Functioning of the European Union.

#### *4.3 Use of environmental claims in marketing*

Beneficiaries should exercise caution in all public communication and marketing relating to operations supported under this scheme. All communication should be in line with applicable consumer protection and marketing legislation, and terms such as “green”, “sustainable” or similar expressions must not be used in a way that may mislead consumers.

Beneficiaries should:

- Ensure any claims made are truthful, clear and accurate.
- Make environmental claims only when they have sufficient evidence to support the claim.
- Refrain from using vague and general claims.
- Focus on environmental or social measures only when significant to the environmental impact of the Beneficiary’s operations as a whole.
- Ensure that sustainability claims that reference the use of sustainable aviation fuels are transparent, accurate, and, at a minimum, adhere to widely recognized quality standards.
- Sustainability claims should not create a misleading impression about the overall impact of the Beneficiary or the act of flying.