
# Sustainable Aviation Fuel (SAF) Incentive at Heathrow 2026

## Guidance for Airlines

Issued: 31 October 2025



Heathrow

# Contents

# 1 How SAF is defined

For the purpose of the SAF Incentive, Heathrow accepts SAF, which is captured under the definition[1] of SAF as set out in the UK SAF Mandate and Department for Transport's ("**DfT**") technical and compliance guidance (as amended, updated or replaced from time to time). The UK SAF mandate came into force in January 2025 and replaced the RTFO for aviation[2]. The conditions below have been adjusted accordingly.

Qualifying SAF must meet the DfT's minimum requirements:

- Reduce CO2e by at least 40% relative to fossil kerosene on a lifecycle basis;
- Eligible SAF must be made from sustainable, waste or residues derived from:
    - biomass (e.g. used cooking oil or forestry residues)
    - fossil wastes that cannot otherwise be avoided, reused or recycled (such as unrecyclable plastics)
    - renewable or nuclear power
    - SAF produced from food, feed or energy crops is not eligible.

Heathrow's clear preference is for recycled carbon fuels ("**RCF**s"). RCFs are fuels produced from fossil and biogenic wastes that cannot be avoided, reused or recycled – such as fuels produced from municipal solid waste, cellulosic waste (such as forestry and agricultural residues) and used cooking oil, and RFNBO including 'power-to-liquid' fuels using renewable electricity in their production. Use of RCFs and RFNBO, however, is not a requirement for this SAF Incentive.

At present, Heathrow does not differentiate between the minimum requirement and leading-edge SAF because we believe the priority remains to support the SAF market and help it gain momentum. As this SAF Incentive progresses over the coming months and years, we intend to keep sustainability standards under constant review and we will likely consult on more stringent sustainability standards for future scheme years.

# 2 Criteria for SAF usage at Heathrow Airport

Provided that it offers an auditable and verifiable path, measurement, reporting, and verification of SAF use should align with the UK SAF Mandate sustainability criteria and eligibility. We welcome feedback as part of our annual airline engagement on how to make this SAF Incentive scheme both easy to use and effective.

[1] See The SAF Mandate: an essential guide - GOV.UK
[2] See RTFO and SAF Mandate Technical Guidance and figure in Annex 1 for how fuels can be classified under the RTFO and the SAF Mandate depending on their feedstock and fuel type

## 2.1 Documentation required to verify sustainability

In line with the UK ETS, the EU Emissions Trading Scheme ("EU ETS"), and the ICAO Carbon Offsetting and Reduction Scheme in International Aviation ("CORSIA"), to ensure that the fuel is sustainably produced, Heathrow requires a copy of the Product Transfer Document received by the airline when it places its order for SAF with its fuel supplier, and a Proof of Sustainability (POS) as well as a verified emissions reduction report.

Since the incentive supports only voluntary SAF demand beyond the UK SAF Mandate, airlines must obtain written confirmation from the fuel supplier that the SAF volumes claimed:

1. Comply with the same sustainability criteria as the UK SAF Mandate, if not already included in the POS and
2. Have not been claimed under any mandated scheme.

This confirmation can be provided in one of the following formats:

- A formal letter from the fuel supplier confirming the SAF volume is additional, voluntary, and not used to meet any mandated schemes (e.g. UK SAF Mandate or ReFuelEU SAF Mandate). The letter should specify the volume delivered, contract number, and batch identifier.

  or

- A clear statement within the PTD or POS confirming the SAF is outside any mandated obligation[3] (e.g. the POS has not been retired).

The manufacturing facility of the SAF must be certified to:

- The Roundtable on Sustainable Biomaterials ("**RSB**");
- The International Sustainability and Carbon Certification ("**ISCC**");

## 2.2 Documentation required to prove uplift at Heathrow Airport

SAF is considered to have been delivered to Heathrow Airport on the provision of evidence of receipt at London Heathrow Airport or delivery into a pipeline connected to London Heathrow Airport, on a mass balance basis.[4]

Evidence can include a suitable batch delivery or 'movement ticket', or another accepted proof of delivery to a Heathrow Airport fuel supply location (e.g. POS with airport delivery point).

A copy of the Product Transfer Document(s) and the associated movement ticket for the batch should be sent by email to: saf@heathrow.com. Any commercially sensitive financial information on these documents can be redacted as necessary, so long as Heathrow is able to determine the information required for the purpose of the SAF Incentive, for example, the type of SAF claimed for and the volume delivered to the Airport.

For 2026 claims, evidence of SAF delivery to the Airport must be provided by 31 January 2027 and will be required for verification before allocation of any applicable SAF Credit. Heathrow may use an independent verifier to check the documentation that proves uplift at Heathrow and compliance with sustainability criteria.

We welcome airline feedback on required documents.[5]

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[3] See Annex 2 for SAF Product Transfer Document Template

[4] Airlines may choose to use a global standard density for jet fuel of 0.8 for the purposes of calculating delivered SAF weight into LHR.

[5] The SAF market is global and nascent. Documentation required to prove sustainability, additionality to the mandate, and delivery at Heathrow on mass balance basis may vary and evolve rapidly.

## 3 How the SAF Incentive Scheme works

The legal terms applicable to the SAF Incentive are set out in the Heathrow Conditions of Use[6] and those terms are supported by the information set out in this guidance[7]. As outlined in our 2026 airport charges decision document, the SAF Incentive Scheme will collect the incentive pot through the departing passenger charge and re-distribute the pot back to airlines that participate in the SAF Incentive Scheme and who have delivered SAF to Heathrow in 2026. The SAF Incentive is calculated by reference to reducing the premium price gap between fossil kerosene and SAF fuel by approximately 50%. For the purpose of the SAF Incentive Scheme in 2026, Heathrow has assumed the premium to be £1300 GBP per tonne, so will incentivise SAF delivery to Heathrow Airport on the basis of £650 per tonne, up to the maximum cap set out in the Conditions of Use.

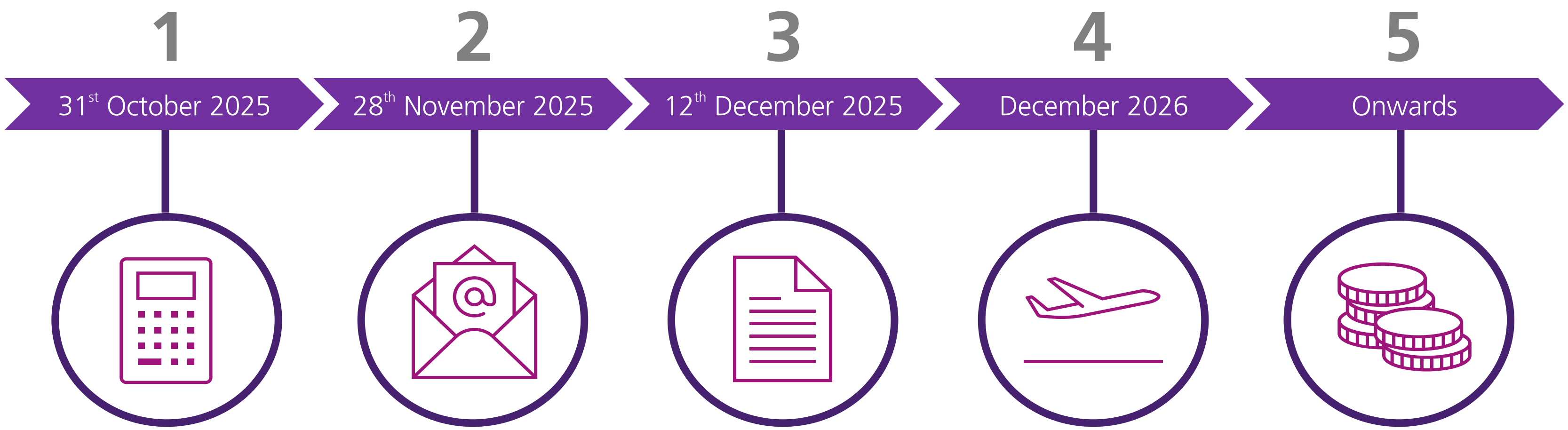
In 2026, to recognise that this increase in the departing passenger charge will drive additional revenue outside the MAY due to cargo ATM charges there will be two SAF incentive pots. One pot for Passenger ATMs and a separate pot for Cargo ATMs which will be funded via the cargo minimum departure charge. The Passenger ATM SAF Incentive Scheme pot will be allocated based on an airlines' Revenue Passenger Kilometres ("**RPK**"). Similarly, the Cargo ATM SAF Incentive Scheme pot will be allocated based on Freight Tonne Kilometres ("**FTK**").

## 4 How to obtain SAF at Heathrow Airport

Airlines should work directly with fuel suppliers who can arrange delivery of SAF to the airport. Heathrow is not directly involved in the aviation fuel supply chain – the fuel farm and hydrant infrastructure system at the airport is managed, maintained and operated by the Heathrow Hydrant Operating Company Limited ("**HHOpCo**"). However, airlines should contact fuel companies not HHOpCo to obtain SAF for delivery to Heathrow Airport.

[6] See Heathrow Airport Conditions of Use - 2026 at Flight conditions of use | Heathrow
[7] Airlines should note that in the event of any conflict, the terms of the Conditions of Use prevail over anything stated in this guidance document.

## 5 Timeline for the 2026 SAF Incentive Scheme




**1.** On 31 October 2025, Heathrow will calculate and communicate the initial SAF tonnage allocation based on the relevant LHR Revenue Passenger Kilometres ("**RPK**") and Freight Tonne Kilometres ("**FTK**") (as set out further below) for all airlines currently operating from Heathrow Airport. The calculation will be based on the 12-month operating period from October 2024 – September 2025. Ad-hoc carriers, airlines with fewer than 10 operations and discontinued airlines will not be included in the calculation.

**2.** By 5pm (UK time) on 28 November 2025, all Airlines wishing to participate in the SAF Incentive for 2026 must have contacted Heathrow to state their intention to do so by sending an email to saf@heathrow.com outlining:
(i) the number of tonnes of SAF they propose to deliver to Heathrow Airport in 2026; and
(ii) their nominated contact person for the SAF Incentive.
The subject line of the email should read: [Airline Name] – SAF Incentive 2026.

**3.** By 5pm (UK time) on 12 December 2025, Heathrow will review airline submissions, calculate, and communicate each final allocation. An example of the calculation methodology is set out in page 7, below.

**4.** Airlines must ensure that all allocated SAF is physically delivered to Heathrow Airport by 31 December 2026. Airlines must provide Heathrow with evidence of the delivery and the necessary certificates (as set out above).

**5.** Subject to compliance with the terms of the SAF Incentive Scheme terms, as set out in the Conditions of Use, Heathrow will allocate the relevant credit to the Airline's Heathrow Airport charges account. Further terms applicable to this are set out on page 7 of this guidance.

## 6 How the size of the incentive pot is calculated

| Calculation Element | Example |
|---|---|
| Forecasted movements at Heathrow in 2026 | 476k movements |
| Fuel requirement | ≈6.2m tonnes |
| Desired SAF mix outcome | 2.00% |
| 50% of SAF Premium | £1,300 x 50% = £650 |
| **Incentive pot** | **≈ 6.2m t x 2.00% ≈ 124k t x £650 ≈ £81m** |

## 7 Quarterly and Annual Credit Allocation Process

All credits are contingent upon compliance with the terms in the Conditions of Use and submission of verified evidence that meets Heathrow's sustainability criteria, as set out in this guidance. Only after successful verification will the credits be applied to the airline's Heathrow Airport charges account.

Airlines can choose whether to receive these credits on a quarterly or annual basis.

Quarterly Credits: subject to compliance with the terms in the Conditions of Use, and provision of the required evidence within the specified deadlines below, the corresponding credit will be applied to the airline's Heathrow charges account.

**Evidence Deadlines:**

| Period | Submission Deadline | Credit Issuance |
|---|---|---|
| Q1 | April 30 2026 | June 30 2026 |
| Q2 | July 31 2026 | September 30 2026 |
| Q3 | October 31 2026 | December 31 2026 |
| Q4 | January 31 2027 | March 31 2027 |

Annual Credit: Airlines opting for a single annual credit must submit all evidence by 31 January 2027, and the full year's credit will be applied by 31 March 2027.

## 8 SAF Allowance Adjustments for 2026

Allowances are subject to change in accordance with the terms set out in Schedule 6 of the Conditions of Use, and in particular but not limited to, the consequences set out in paragraphs 1.13 (Passenger ATMs) and 2.13 (Cargo ATMs) regarding failures to deliver the allocated amounts. Where any participating airlines exceed their SAF allocation, and there is any additional amount left in the incentive pot, Heathrow may reallocate any remaining amounts in the SAF Incentive Pot among those airlines that have over-delivered in accordance with the Conditions of Use and the general allocation procedure set out in these guidelines.

# 9 How the incentive pot is allocated to airlines

The table below illustrates how Heathrow calculates the SAF incentive allocation per airline using RPK for Passenger ATMs. The same process will be applied for the Cargo ATM incentive pot using FTK.

| POT (T) | POT (£) | 1. Heathrow to publish SAF Incentive allowance per airline based on RPK | | 2. Airlines to submit proposal to HAL | 3. HAL to calculate SAF allowances per airline based on received proposals | | | 4. HAL to publish final SAF allocations by airline | |
|---|---|---|---|---|---|---|---|---|---|
| 124000 | £80,600,000 | By 31 of October 2025 | | By 28 of November 2025 | Final allocation | | | By 12 of December 2025 | |
| Name | RPK share | Allowance £ | Allowance T | Airline Proposal T | **Step 1** | **Step 2** | **Step 3** | Final Allocation T | Final Allocation £ |
| A | B | C | D | E | F | G | H | I | J |
| Airline 1 | 50% | 40,300,000 | 62000 | 85,000 | 62000 | 12286 | 714 | 75000 | £48,750,000 |
| Airline 2 | 20% | 16,120,000 | 24800 | 20,000 | 20000 | 0 | 0 | 20000 | £13,000,000 |
| Airline 3 | 15% | 12,090,000 | 18600 | 22,000 | 18600 | 3400 | 0 | 22000 | £14,300,000 |
| Airline 4 | 10% | 8,060,000 | 12400 | 0 | 0 | 0 | 0 | 0 | £0 |
| Airline 5 | 5% | 4,030,000 | 6200 | 7,000 | 6200 | 800 | 0 | 7000 | £4,550,000 |
| | | | | 134000 | 106800 | 16486 | 714 | **124000** | **£80,600,000** |

Step 1: Proposals within allowances (D) are assigned, any airline proposal (E) higher than the allowance (D) goes to step 2.

Step 2: As Airlines 2 and 4 did not utilise their full allowance (D), we will redistribute unallocated tonnage to airlines wishing to purchase above their initial allowance (D). The remaining tonnage is allocated based on the RPK shares of Airlines 1, 3, and 5. The calculation will continue until the proposal number (E) for each airline is reached. Airlines 3 and 5 have already been allocated their full proposal amount (E) at this stage. Any remaining tonnage after this step will proceed to step 3.

Step 3: So far, Airlines 2, 3, 4, and 5 have been allocated their full proposal amounts (E). Since the difference between Airline 1's proposal (E) and what has been allocated so far (F) and (G) exceeds 714, the entire remaining tonnage will be allocated to Airline 1. If there are more airlines with unused allocations at this stage, we will repeat the allocation process from step 2 until the full tonnage allowance of 124000 is allocated.

# 10 SAF Incentive initial allocation per airline for 2026 based on RPK[8]

| Airline | % | Tonnes | Airline | % | Tonnes | Airline | % | Tonnes |
|---|---|---|---|---|---|---|---|---|
| British Airways Plc | 36.13% | 44,823 | Vietnam Airlines | 0.37% | 454 | Klm Cityhopper B.V. | 0.04% | 46 |
| Virgin Atlantic Airways Ltd | 10.07% | 12,491 | All Nippon Airways Co Ltd | 0.35% | 436 | Air Algerie | 0.04% | 46 |
| American Airlines Inc | 6.67% | 8,275 | Iberia L.A.E. S.A. Operadora | 0.34% | 425 | Brussels Airlines Nv/Sa | 0.03% | 33 |
| United Airlines Ltd | 4.22% | 5,232 | Egyptair | 0.33% | 403 | Bulgaria Air Ad | 0.02% | 30 |
| Emirates | 2.81% | 3,486 | China Airlines | 0.30% | 374 | Loganair Ltd | 0.02% | 27 |
| Air Canada | 2.74% | 3,397 | Finnair Plc | 0.30% | 370 | Croatia Airlines D.D | 0.02% | 19 |
| Qatar Airways Ltd | 2.71% | 3,360 | Transportes Aereos Portugueses | 0.29% | 359 | Tunisair | 0.01% | 13 |
| Singapore Airlines Ltd | 2.66% | 3,301 | El Al Israel Airlines Ltd | 0.29% | 357 | | | |
| Cathay Pacific Airways Ltd | 2.61% | 3,235 | Kenya Airways | 0.29% | 356 | | | |
| Delta Air Lines Inc | 2.54% | 3,146 | Aer Lingus | 0.28% | 347 | | | |
| Air India | 2.28% | 2,832 | Aegean Airlines Sa | 0.28% | 345 | | | |
| Qantas Airways Ltd | 2.04% | 2,531 | Shenzhen Airlines Co Ltd | 0.27% | 332 | | | |
| Etihad Airways | 1.62% | 2,013 | Oman Air B/G | 0.26% | 326 | | | |
| Saudi Arabian Airlines | 1.28% | 1,588 | Biman Bangladesh Airlines Ltd | 0.26% | 324 | | | |
| Thai International Airways | 1.04% | 1,286 | Swiss International Air Lines Ltd | 0.23% | 288 | | | |
| China Southern Airlines Company Limited | 1.02% | 1,271 | Rwandair Ltd | 0.22% | 277 | | | |
| Malaysia Airlines Berhad | 1.01% | 1,259 | Royal Brunei Airlines | 0.19% | 238 | | | |
| Air China (Caac) | 1.00% | 1,235 | Tianjin Airlines Co Ltd | 0.17% | 210 | | | |
| Japan Airlines Co. Ltd | 0.74% | 924 | Royal Jordanian Airline | 0.17% | 207 | | | |
| Tam Linhas Aereas S/A | 0.73% | 906 | Austrian Airlines | 0.16% | 194 | | | |
| Turkish Airlines | 0.70% | 868 | Eurowings Gmbh | 0.15% | 189 | | | |
| China Eastern Airlines | 0.62% | 775 | Middle East Airlines Liban | 0.14% | 171 | | | |
| Eva Airways | 0.61% | 760 | Hainan Airlines Holding Co. Limited | 0.13% | 164 | | | |
| Gulf Air | 0.53% | 662 | Icelandair | 0.12% | 150 | | | |
| Sri Lankan Airlines Ltd | 0.51% | 634 | Lot Polish Airlines | 0.12% | 147 | | | |
| Kuwait Airways | 0.48% | 595 | Km Malta Airlines Ltd | 0.12% | 146 | | | |
| Scandinavian Airlines System | 0.47% | 587 | Vueling Airlines S.A. | 0.11% | 138 | | | |
| Korean Air | 0.47% | 586 | Beijing Capital Airlines | 0.10% | 122 | | | |
| Westjet | 0.42% | 521 | Air France | 0.07% | 90 | | | |
| Aerovias Del Continente Americano Sa Avianca | 0.42% | 517 | Royal Air Maroc | 0.07% | 82 | | | |
| Lufthansa German Airlines | 0.41% | 507 | Azerbaijan Airlines | 0.05% | 58 | | | |
| Asiana Airlines | 0.41% | 506 | Air Serbia A.D. | 0.05% | 57 | | | |
| Aerovias De Mexico Uk Branch | 0.41% | 505 | Uzbekistan Airways | 0.04% | 53 | | | |
| Jetblue Airways Corporation | 0.39% | 483 | Cjsc Air Astana | 0.04% | 53 | | | |
| Ethiopian Airlines Sc | 0.38% | 466 | Klm Royal Dutch Airlines | 0.04% | 47 | | | |

[8] As noted above, allowances are subject to change in accordance with the terms set out in Schedule 6 of the Conditions of Use.

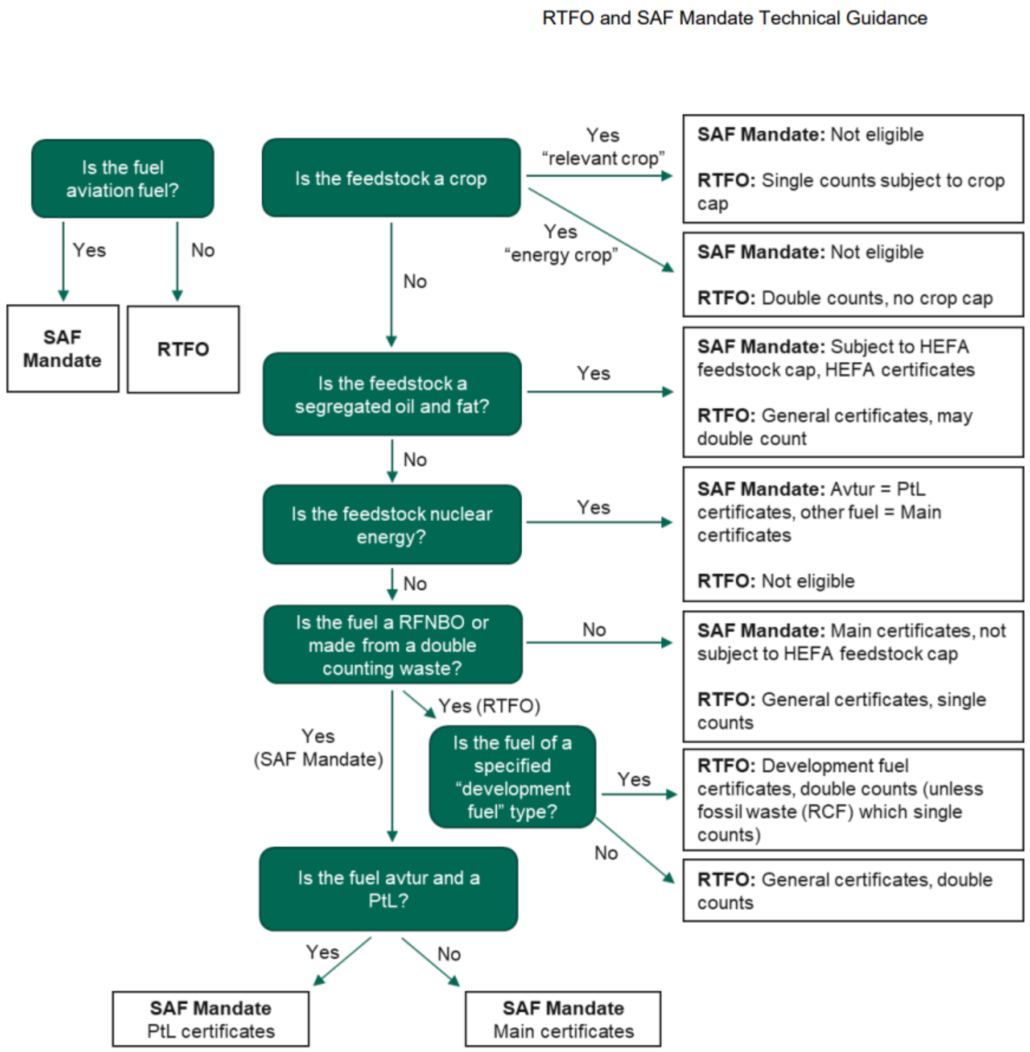
## 11 Cargo ATM Incentive initial allocation per airline for 2026 based on FTK[9]

| Airline | % | Tonnes |
|---|---|---|
| Cathay Pacific Airways Ltd | 24.96% | 146 |
| Korean Air | 23.04% | 135 |
| Singapore Airlines Ltd | 19.98% | 117 |
| Emirates | 10.76% | 63 |
| Qatar Airways Ltd | 10.76% | 63 |
| European Air Transport | 8.26% | 48 |
| Turkish Airlines | 1.44% | 8 |
| British Airways Plc | 0.55% | 3 |
| Virgin Atlantic Airways Ltd | 0.25% | 1 |

[9] As noted above, allowances are subject to change in accordance with the terms set out in Schedule 6 of the Conditions of Use.

# Annex 1 - Fuel Classification under RTFO & SAF Mandate

Flow chart outlining how fuels can be classified under the RTFO and the SAF Mandate depending on their feedstock and fuel type



## Annex 2 – SAF Product Transfer Document Template

**SUSTAINABLE AVIATION FUEL (SAF)**
**PRODUCT TRANSFER DOCUMENT (PTD)**

### PRODUCT AND DELIVERY INFORMATION

| | | |
|---|---|---|
| **Has this SAF volume been claimed under any mandated scheme?** | **Yes** | **No** |
| **If Yes, what mandated scheme?** | | |
| SAF Purchaser | | |
| Type/Grade of Underlying Product | | |
| SAF Producer | | |
| Production Location | | |
| Production Origin | | |
| Producer Certificate Number | | |
| Producer Delivery Reference | | |
| Batch Number (unblended) | | |
| Batch Certificate Number (blended) | | |
| Blending Location | | |
| Transfer Location | | |
| Transfer Date | | |

### SUSTAINABILITY INFORMATION

| | | |
|---|---|---|
| Feedstock | | |
| Feedstock Country(s) of Origin | | |
| SAF Volume/Weight (Unblended) | | |
| Litre Band Allocated From/To | | |

| | | |
|---|---|---|
| Carbon Intensity (g $CO_2$e/MJ) | | |
| Fossil Baseline (g $CO_2$e/MJ) | | |
| GHG Lifecycle Reduction | | |
| Tank-to-Wake Emissions Avoided (tonnes $CO_2$e) | | |
| Well-to-Wake Emissions Avoided (tonnes $CO_2$e) | | |

### CALCULATION ASSUMPTIONS

## Annex 3 - Frequently Asked Questions

1. What is the Heathrow SAF Incentive Scheme?
   It's a financial incentive programme designed to support voluntary uptake of Sustainable Aviation Fuel (SAF) at Heathrow by partially bridging the cost gap between SAF and conventional jet fuel.

2. What SAF qualifies for the incentive?
   SAF must:
   - Meet the UK SAF Mandate sustainability criteria
   - Be voluntarily purchased (i.e. not used to meet any mandated scheme).
   - Be physically delivered to Heathrow or into a connected pipeline (mass balance basis).

3. How are incentive credits allocated?
   Credits are applied to the airline's Heathrow charges account, either quarterly or annually, based on verified SAF delivery and documentation.

4. What are the deadlines for submitting evidence?
   - Quarterly submissions: Due at the end of the month following each quarter
   - Annual submissions: Due by 31 January 2027 for all 2026 deliveries

5. What happens if SAF evidence is submitted after the quarterly deadline?
   Submissions received after the specified quarterly deadlines will still be considered, however, any credits due will be applied during the next scheduled credit issuance period. Please note that all SAF evidence must be submitted by 31 January 2027.

6. Who should airlines contact for support?
   All SAF-related queries and submissions should be sent to: saf@heathrow.com