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June 24, 2022

Doreen Harris
President and CEO
New York State Energy Research and Development Authority

Basil Seggos
Commissioner
New York State Department of Environmental Conservation

c/o NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

RE: Climate Action Council Draft Scoping Plan

Dear Climate Action Council Co-Chairs and Council Members,

We appreciate your service to the New York State Climate Action Council in the development of the Draft Climate Action Scoping Plan. The Scoping Plan will guide New York in the implementation of the Climate Leadership and Community Protection Act, one of the most ambitious climate laws in the world.

American Express Global Business Travel (Amex GBT) is the world's leading B2B travel platform, with some 19,000 clients globally and presence in more than 140 countries. Companies of all sectors and sizes rely on Amex GBT to help them use travel and meetings as tools to power economic, social and environmental progress. We are committed to operating in the most environmentally responsible manner possible and collaborating across the entire travel ecosystem to accelerate the journey to a net-zero world.

Amex GBT applauds the Climate Action Council for including a Clean Fuel Standard (CFS) in the Draft Scoping Plan as a recommended Market-Based Solution. With a CFS, New York can concurrently transition to clean fuels, improve public health, and help the state reach its ambitious climate goals. **We urge the Climate Action Council to include the CFS in the Transportation Sector Strategies of the Final Scoping Plan.**

A CFS is a technology-neutral, performance-based standard that will help New York reduce criteria and GHG emissions and decrease dependence on petroleum in transportation. As stated by the Union of Concerned Scientists in a Clean Fuel Standards Fact Sheet, "A clean fuel standard is a proven policy approach to reducing transportation emissions that complements support for EVs and emissions standards for cars, trucks, and electricity generation."¹

As the experience with California's Low Carbon Fuel Standard has shown, a CFS is also a highly effective policy tool to establish supply of sustainable aviation fuel (SAF). We view SAF as a crucial GHG reduction strategy in the aviation sector. Because electrification of commercial aircraft is

¹ Union of Concerned Scientists, "Clean Fuel Standards: A Proven Approach to Fuel a Low-Carbon Future," at https://www.ucsusa.org/sites/default/files/2020-11/clean-fuel-standards_0.pdf (2020).



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decades away, SAF is the solution to meaningfully reduce emissions in the aviation sector to help New York achieve its climate goals. Depending on its blend level, SAF can reduce greenhouse gas (GHG) emissions by up to 80%, SO_x by nearly 100% and particulate matter by about 50%.

SAF is a drop-in fuel that can be made sustainably with a variety of feedstocks, many of which have multiple benefits beyond the significant reduction of GHG emissions in aircraft. For example, using municipal solid waste as a feedstock can reduce landfilling and methane emissions from landfill emissions.

The aviation industry is eager to utilize SAF to meet its environmental goals and reduce aviation emissions, but there is not enough supply of SAF to meet demand. In 2021, virtually the entire supply of SAF in the United States was utilized in California due to the beneficial impact of the CFS program in existence in that state.

For many businesses, air travel is crucial to growth. However, options to reduce air travel emissions are currently limited. With lower or zero carbon technologies such as hydrogen and electric flight decades away from having impact at scale, this leaves SAF as the only viable option for reducing emissions in the near- to medium-term.

American Express Global Business Travel strongly urges the Climate Action Council to include a firm endorsement of a CFS in the Transportation Sector Strategies of the final Scoping Plan. A CFS is essential to decarbonize transportation and achieve New York's ambitious climate goals. Thank you for your consideration of our input on this important subject.

Sincerely,

Nora Lovell Marchant
Vice President, Sustainability