



Willis Sustainable Fuels Response to the Public Bill Committee on the Sustainable Aviation Fuel (SAF) Bill

Introduction to Willis Lease Finance Corporation

Willis Lease Finance Corporation (WLFC) is a leading global aviation services partner offering a portfolio of products, services, and aircraft financing solutions for fleet management and maintenance. Established in 1985, WLFC operates offices and facilities across Europe, the United States, and Asia.

WLFC has made significant investments in the United Kingdom, creating approximately 400 highly skilled jobs in Teesside and Bridgend. We have also started the recent expansion¹ at Teesside International Airport to provide additional advanced maintenance services leading to increased employment.

Willis Sustainable Fuels UK Limited (WSF) is a wholly owned subsidiary of WLFC.

Willis Sustainable Fuels UK

WLFC has committed substantial investment to the WSF Teesside project, which aims to produce 14,000 tonnes annually of sustainable aviation fuel (SAF) from biomethane, also known as second-generation SAF. By partnering with industry leaders such as Axens, McDermott and Johnson Matthey, we are reducing project risk and accelerating delivery timelines with operations targeted in 2028.

Our bankable approach enables rapid market entry, maximises engagement with the UK supply chain, and drives meaningful progress towards a more sustainable future for aviation. This initiative is backed by a grant from the UK Government's Advanced Fuels Fund and is designed to deliver SAF with a greenhouse gas intensity at least 80% lower than conventional jet fuel. The facility is expected to create around 200 jobs during construction and approximately 40 direct jobs once operational.

Looking ahead, we are exploring additional projects where feedstock availability, energy resources, financing, workforce, and customer demand converge to create investable projects. This strategy could allow us to adapt our production pathway to third-generation SAF, utilising renewable energy through a power-to-liquids pathway.

SAF Bill

We welcome the SAF Bill's provision empowering the Secretary of State to direct a designated counterparty to offer "revenue certainty contracts" to SAF producers, the so-called Revenue Certainty Mechanism (RCM). This mechanism is an important tool to reduce financial risk and incentivise investment in SAF production.

WSF requests that the SAF bill supports early offtakers and first-mover SAF producers.

¹ <https://www.wlfc.global/hubfs/PDFs/News-Room/Press%20Releases/Press%20Release%20-%20Hangar%20at%20Teesside%20Draft%20FINAL.pdf?hsLang=en>

Accordingly, we ask that the UK Government:

- Issue a roadmap which shows that early-mover projects outside of the RCM, and RCM-supported projects are both required to meet the UK's SAF Mandate;
- Deliver a SAF bill with a levy to fund the RCM which supports early movers; and
- Ensures that the technical guidance² for the UK SAF Mandate facilitates the use of sustainable feedstocks, supports projects throughout their whole lifetime, and establishes requirements for processing energy which minimise project-on-project risk.

WSF believes that these actions could help position the UK as a leader in production of second generation SAF for both domestic use and export. Should you have any questions please contact Helen Bray, policy adviser, hbray@willislease.com

Kind regards,



Dr. Amy Ruddock
SVP Sustainable Aviation and Corporate Development
Willis Lease Finance Corporation
www.willissustainablefuels.com

² <https://assets.publishing.service.gov.uk/media/67626f161ca3ec0a49e1908e/rfo-and-saf-mandate-technical-guidance-2025.pdf>