ReFuelEU: Europe’s new anti-tankering rules explained

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Jan 2026 update:

ReFuelEU Aviation now also applies at LSZH/Zurich and LSGG/Geneva. Switzerland isn’t in the EU, but it has chosen to adopt the rules, which means both airports are treated just like Union airports. The official list is attached if you want to double-check. It does look like the Swiss ICAO codes are wrong, but it’s just a typo. Zurich and Geneva are clearly intended and this should be fixed in a future update.

Jan 2025 update:

- **New anti-tankering rules came into force on Jan 1 2025, heavily restricting large commercial operators from tankering fuel into or within Europe.**
- **The first annual reporting deadline fell in March 2025, marking the first real compliance test for operators.**

There’s a still relatively new framework in Europe called ReFuelEU, and it looks like it’s going to be a real headache for operators.

Since January 2025, **the rules have applied to all large commercial operators** (those doing 500+ flights from EU airports each year). Over the course of a calendar year, operators must ensure that, on average, 90% of the fuel required for flights departing from a specific EU airport is uplifted at that airport. **The reporting is done annually, so it’s about maintaining compliance as a yearly average rather than for each individual flight.**

These rules applies to **all commercial operators** – both EU-based and non-EU-based. Private flights and all non-commercial operations are exempt.

This whole ReFuelEU thing is being run by the EU. They claim it's part of the general push to **"make things more green"**. Maybe. Or maybe these anti-tankering rules are actually more to do with the **EU getting fed up with big airlines blazing into Europe with their tanks still half-full** of the cheap fuel they brought from "home". European airports, unable to sell as much of their expensive fuel, have been missing out.

But remember – the rules apply to intra-EU flights as well! So it's not just all those Middle East to Europe flights that are affected. For example, a flight from Bulgaria (cheap fuel) to Germany (expensive fuel) will not be allowed to tanker either.

Politics aside, these new rules are going to be **disproportionately tough on bizjet operators** with unscheduled, last-minute flights. Whilst one could claim this whole thing might make some sense for airlines, it will make planning extremely tricky for other large non-scheduled commercial operators who don't necessarily know what they'll be doing next week, let alone across the entire year! Also, there's really not so much value on the "make things more green" front either. 777s, A380s and A380s often tanker tonnes of fuel; Citations, Falcons and Gulfstreams – not so much. Then there's the added complexities with reporting, reduced fuel flexibility, and even potential safety risks if operators start running tighter fuel margins.

Reporting rules for operators

Welcome to hell. We're not going to dive deep down into this basket of snakes here, but just to give a rough outline of what operators have to do…

1. Prepare an annual report.

This should include:

- The yearly aviation fuel required (trip and taxi fuel for all flights departing from a given EU airport).
- The yearly aviation fuel uplifted at that airport.
- Any fuel shortfalls below the 90% requirement, with justifications (e.g., safety or other exemptions).

2. Pay to get the report verified.

The verifier will ensure the report is accurate, complete, and compliant with the rules. They will review the operator's data, including:

- Fuel uplift records.
- Supporting docs (e.g. flight logs, fuel invoices, operational flight plans) to justify fuel usage, especially for exemptions.
- Justifications for exemptions (if applicable). If operators want an exemption, they have to justify it with detailed reasons (e.g. safety concerns, operational difficulties) and provide evidence to the authorities.

Any discrepancies or missing data must be resolved before the report is finalized.

3. Submit the report.

- After verification, the report has to be submitted to the competent authority of the Member State responsible for the operator, as well as the European Union Aviation Safety Agency (EASA).
- The report must follow a specific format (specified in Annex II). This includes tables and fields for annual aviation fuel required, fuel uplifted, and justifications for exemptions.

Key dates for reporting.

The reporting period is the calendar year, from January 1 to December 31. So the key dates for this are as follows:

- **January 1 – December 31:** Reporting period.
- **(following year) January – March:** Verification by an independent verifier, with March 31 submission deadline to competent authorities and EASA.

The first annual report was due by March 31 2025, covering the reporting period from Jan 1 to Dec 31 2024.

What airports in the EU are impacted?

Not all of them!

The rules apply to "Union Airports" that meet certain thresholds – mainly **those where pax traffic exceeds 800,000 passengers annually.** Smaller airports that do not meet these thresholds are excluded to avoid placing "undue operational and financial burdens" on them.

Also, airports in **"Outermost Regions"** (e.g. the Azores, Madeira, Canary Islands, and French overseas territories) are generally excluded too, due to their geographic and logistical challenges. These airports can opt-in to the rules if they like though.

The EU publishes and updates an **annual list of airports** that fall under the scope of these rules. You can access it here.

Other concerns for Business Aviation

The European Business Aviation Association (EBAA) are currently working on presenting some of the issues to the EU. But ultimately, they highlight **three big issues:**

1. **Lack of flexibility.** Business aviation's dynamic and diverse operations require more flexibility than what the anti-tankering rule allows.
2. **Administrative Burden.** Reporting requirements, including detailed fuel data, create significant workload and could divert resources away from safety-critical tasks.
3. **Safety Risks.** Increased risks include in-flight fuel emergencies, crew fatigue, missed ATC slots, fueling-related hazards, and more. There are also concerns about compromised fuel quality and strained infrastructure due to increased refueling requirements.

For more info on all this, check the ReFuelEU website. It includes the list of airports affected, plus

the official rules in full (Article 5) – check the docs at the bottom of the webpage.