TO:
Frans Timmermans, Executive Vice-President for the European Green Deal
Adina Valean, Commissioner for Transport
Thierry Breton, Commissioner for Internal Market
Kadri Simson, Commissioner for Energy

CC:
Kurt Vandenberghe, European Green Deal Adviser to the Commission President
Herald Ruijters, Director, DG MOVE

11 March 2021

Subject: Eurelectric asks on the revision of the Directive on Alternative Fuels Infrastructure

Dear Executive Vice-President,
Dear Commissioners,

Eurelectric supports an ambitious revision of Directive 2014/94/EU on Alternative Fuels Infrastructure (AFID), coherent with the priorities of the Green Deal and the Sustainable and Smart Mobility Strategy. An adequate infrastructure is critical to achieve the CO2 emission reduction goals for vehicles, which is the main lever for reducing emissions overall in the transport sector.

Our industry believes that the definition of the fuels within the current Directive must be updated to fully support the decarbonisation of the transport sector. Moreover, as electrification will play a key role in road transport decarbonisation, the revision should ensure a proper market governance for charging infrastructure.

Eurelectric has set out 10 key recommendations for the upcoming review proposal of the Directive by calling the European Commission, which you will find annexed to this letter.

We hope you find these recommendations useful and remain at your disposal for further discussion on the matter.

Yours sincerely,

Kristian RUBY
Secretary General, Eurelectric

Annex

Eurelectric asks on the revision of the Directive on Alternative Fuels Infrastructure

1. **Preserve a market-driven approach for electric vehicle (EV) charging infrastructure.** The successful development of EV charging in recent years clearly demonstrates that progress is attainable in a competitive environment. This suggests preserving such an approach in order to install the millions of public and private charging points needed over the next decade.

2. **Place customers truly in the driver's seat.** This would require free choice for the authorisation and payment methods, free choice of e-mobility service provider (EMSP), free choice of prices and tariffs and the exclusion of price caps or other pricing regulation.

3. **Develop a European charging infrastructure masterplan.** EU-wide targets for publicly-accessible charging infrastructure have to be linked to (1) the dissemination targets for battery and plug-in electric vehicles, (2) their charging capabilities as well as (3) the number of non-public charging infrastructure. The role and contribution of ultrafast charging hubs along highways, in urban areas and in the countryside has to be adequately reflected. Isolated mandatory targets for public charging infrastructure need to be rejected from a competition perspective formulas as they will lead to market inefficiencies and sunk costs. Instead, a clear and harmonised methodology for the roll-out of chargers should be applied.

4. **Guarantee interoperability with a consumer-centric approach.** Putting in place guiding principles for interoperability is key to ensuring the seamless EV charging experience through the use of open, market-driven and consensus-based standards. Mandating specific standards and protocols is a detrimental approach because it may lead to anti-competitive market conditions and technological lock-in. Access to static and basic dynamic data from the charging process and required data from the vehicle battery is cornerstone in this sense and should be transparent to use by the customers.

5. **Remove unnecessary red tape and bureaucracy.** The revised EU legislation should empower local authorities to simplify administrative procedures for installing public and private charging infrastructure.

6. **Revise consistently with the Trans-European Transport Networks (TEN-T) Guidelines Regulation**. This would require aligning high power infrastructure requirements (notably in the context of urban nodes) with the electricity development plans under TEN-E in order to fully unlock synergies between energy and transport.

7. **Revise consistently with the Energy Performance of Buildings Directive (EPBD).** EU member states must make sure that private and semi-public charging infrastructure roll-out is facilitated by bringing forward obligations to make all buildings EV-ready. Greater emphasis must also be placed on neighbourhoods and urban quarter solutions, where the existing building stock lacks covered garage spaces. The revision should aim to give all Europeans the 'right to plug'.

8. **Ensure a strong implementation of EU laws.** It is essential to set the pace for homogenous implementation in all Member States, including by considering the use of a Zero Emission Infrastructure Regulation. The benefits are two-fold: the approach will prevent the development of incoherent measures across different countries, whilst simultaneously speeding up the implementation of the agreed provisions. EU laws need to look at possible alignment and overlap in terms of requirements from other legislative measures. Such implementation should also allow Member States some flexibility in determining how to establish public charging infrastructure sufficiency taking into account local customer requirements and territory specificities.

9. **Capitalise on fleet electrification as a catalyst.** The switch to electric fleet vehicles should be combined with strong incentive schemes to further increase their attractiveness and give a clear advantage over the continued purchase of combustion engines. However, the design of the incentives should be left to the member states.

10. **Support the implementation of smart charging to foster efficient decarbonisation of both the transport and energy sectors.** Making sure that decarbonised electricity is the favoured option for charging, especially in Member States where CO2 intensity of the energy mix remains relatively high, is essential. The increased integration of renewables goes hand in hand with smart charging and makes the vehicles a resource of system flexibility.