

AFIR Review: an opportunity for refinement, not replacement

Eurelectric position paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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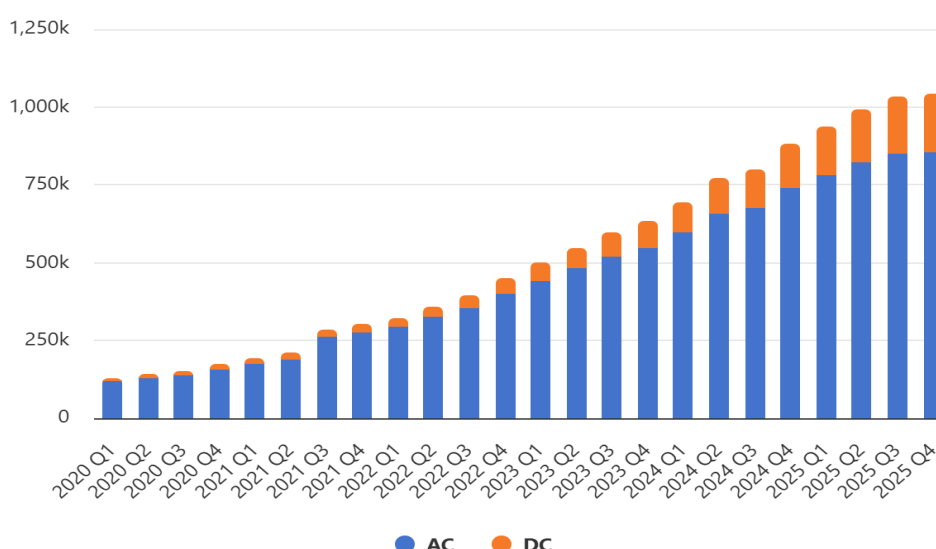
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Introduction: AFIR is a success, but implementation is key

Eurelectric welcomes the mandated review of the Alternative Fuels Infrastructure Regulation (AFIR) by the end of 2026. It is more than clear that AFIR has proven to be a successful policy mechanism to stimulate the deployment of public electric vehicle (EV) charge points across Europe. Therefore, Eurelectric will continue to emphasise the overall importance of providing the necessary level of certainty to the various industry stakeholders and investors. Ensuring a strong and stable policy framework is vital for cultivating the investor confidence needed to finance the electrification of Europe's transport sector.

AFIR has worked; the data is clear in this conclusion. Initially coming into force as AFID in 2014 and followed by AFIR in April 2024, there have been multiple signals that the Regulation has had a positive effect on Europe's charging infrastructure rollout. By the end of 2025, the EU had approximately **1.04 million** charge points (including AC and DC), **an increase of over 700% from the start of 2020**.¹ In addition to this, the number of fast charging points is rapidly increasing. **The number of DC fast chargers grew by 35% year**

Figure 1: Number of recharging points from 2020 Q1 - 2025 Q4 ¹



on year in 2025, with over 93,000 level 1 (>150 kW) and approximately 20,000 level 2 (>350 kW) ultra-fast chargers available, providing the speed and convenience that benefits consumers.¹ This trend is consistent with AFIR's binding rollout framework, which provides long-term visibility and supports coordinated deployment along TEN-T corridors. In this way, the Regulation provides the backbone of the public charging infrastructure network and will continue to mandate the core facilities necessary to address range anxieties and enable the widespread utilisation of BEVs across the EU.

However, implementation of the Regulation needs to be consistent across all Member States, including the timely publication of the National Policy Frameworks (NPFs).

¹ European Alternative Fuels Observatory, Road Infrastructure

Although final versions of these national plans were to be submitted by the end of 2025, some countries have yet to publish even a first draft. The NPFs are critical for ensuring transparency by allowing the Commission to assess national measures and monitor progress toward the mandatory infrastructure targets established under AFIR. This includes those related to minimum power outputs, deployment timelines, and coverage along the TEN-T network.

The regulation mandates that AFIR be reviewed by the end of 2026, and every five years thereafter. Therefore, this is the main opportunity that the E-mobility industry has to make crucial refinements to a law that will fundamentally impact the rollout of the charging infrastructure of Europe over the next five years. It is essential that we make the most of this revision to future-proof the provisions in the regulation, and to provide industry with the certainty and support that it needs to fulfil its potential.

The upcoming review is an opportunity to refine an already effective piece of legislation. Ambition must be safeguarded, while tweaking some aspects to enable industry stakeholders and Member States to better implement the provisions contained.

Therefore, Eurelectric has identified the following 5 key areas to be addressed in the upcoming review:

- 1. Regulatory stability & feasibility**
- 2. Technical standards & definitions**
- 3. Interoperability & data integration**
- 4. Consumer experience & payment systems**
- 5. Funding & grid planning**

1. Regulatory stability & feasibility

To ensure that the legislation is indeed a success, targeted amendments to address specific loopholes, implementation challenges and regulatory inconsistencies would ensure stability and minimise disruption for ongoing compliance and investment in the relevant infrastructure. While some adjustments are necessary to the legislation and should be made where necessary, care should be taken not to disturb the parties that are already committing to the e-mobility ecosystem positively.

First and foremost, **the current power-output targets defined for light-duty vehicles (LDVs) should be maintained** as they align infrastructure rollout with the actual rate of EV adoption in each member state, with most countries already surpassing their targets. **The current distance-based targets for LDVs should also be maintained**, as they provide for a predictable and structured charging network along the major transport corridors, with targets increasing every couple of years for both the core and comprehensive TEN-T network.

For heavy-duty vehicles (HDVs), Eurelectric also supports the current core and comprehensive TEN-T targets, as they provide for predictable and reliable charging points along freight corridors. However, where factors like the total annual average daily traffic of HDVs or the socio-economic cost-benefit terms are deemed insufficient, Eurelectric supports the Member States right to make use of the derogations set out in Article 4(4-7).² In some cases, it may be relevant for other conditions such as variations in geography or the operational patterns of HDVs to also be taken into consideration for deployment requirements.

In the Commission's 2025 Market Readiness Analysis for HDVs, it expects depot charging to have healthy utilization rates, while public charging utilization could be as low as 2% in some scenarios.³ Thus, **AFIR must balance adequate coverage for long-haul routes without forcing the unnecessary deployment of HDV chargers in low demand areas, since it could lead to wasted investment and inefficient grid use**. Additional requirements, such as further geographical granularity or power-output targets similar to those for LDVs, could create disproportionate burdens for certain regions and risk higher costs for charge point operators (CPOs).

The rollout of charging infrastructure under AFIR should not remain dependent on gas station concessions along the TEN-T network. In many countries, access to highway service areas is governed by long-term concession models historically designed for fossil fuel infrastructure, effectively granting gas station operators control over public spaces. Conditioning the deployment of alternative fuel infrastructure on these legacy arrangements risks delaying implementation and distorting competition. Separate and dedicated procedures for charge points are, therefore, essential to ensure timely deployment, fair market access, and regulatory neutrality between fossil and zero-emission technologies.

² Alternative Fuels Infrastructure Regulation EUR-Lex, [link here](#).

³ EU Commission's 2025 Market Readiness Analysis for HDVs, [link here](#).

With that said, ensuring sufficient coverage along corridors is not enough on its own. **The availability of charging infrastructure at urban nodes and multimodal passenger hubs is also critical for the decarbonisation of European road transport.** Strengthening public HDV charging infrastructure at these locations would support last-mile logistics, regional freight transport and operational flexibility.

Overall, it is important that such infrastructure roll-out is included in the NPFs published by Member States, and that these plans are shared with local grid operators to fully consider for their long-term planning. This is particularly relevant for HDVs, which will require additional clarity and forward planning due to their significant load on the grid.

2. Technical standards & definitions

Various definitions present in AFIR (e.g. smart charging, bidirectional charging, end user, high-power vs. normal power charging, publicly accessible infrastructure) could be further clarified and aligned with industry realities, in order to avoid misinterpretation and ensure effective implementation. Having clear and accepted definitions for these facets of the e-mobility ecosystem will allow for a straightforward implementation of the legislation.

There is also a need for alignment between vehicle-side and infrastructure-side requirements to ensure that advanced functionalities (e.g. plug & charge, bidirectional charging) deliver real benefits to consumers. This is crucial to ensure that both sides progress hand in hand, facilitating increased utilisation for the infrastructure that must be built out while providing an enhanced EV driver experience.

ISO 15118-20 & V2G

Vehicle-to-Grid (V2G) capability can significantly strengthen Europe's energy system by enabling EVs to act as flexible storage assets that support grid stability, integrate renewable generation, and reduce overall system costs. To unlock this potential, **V2G must be supported by coherent regulatory frameworks, clear roles for system operators and OEMs, interoperable standards, and market mechanisms that fairly reward flexibility services.**

Required by the recently published Delegated Act on data standards, ISO 15118-20 will be a key enabler of a modern and effective European charging infrastructure. With this standard, the act will mandate 'plug and charge' capabilities and secure digital communication; both key for ensuring that consumers can enjoy a smooth user experience with safe and traceable payments. It also ensures V2G functionality and smart energy data exchange, facilitating increased renewable integration and energy storage management through EV uptake.

Although Eurelectric is in favour of equipping the e-mobility system to be V2G capable, the timeline for the implementation of ISO 15118-20 may need to be reassessed to reflect real world feasibility. As the standards are to be updated to ISO

15118-20 for all newly installed and refurbished chargers (public or private) by January 2027, the deadline should be adjusted to avoid imposing costs for compliance.⁴

It is important to not only place responsibility on the charging-side, but also the vehicle-side. All new EVs must also be made ISO 15118-20 compliant, so that new vehicles put onto European roads will be able to communicate with and take advantage of the powerful capabilities that the standard will mandate for the charging infrastructure. There is little point in having a charging network that is capable of V2G functionalities if the vehicles that will be interacting with the very same network are not also compatible.

Overall, EV owners utilising private charging are best positioned to provide V2G services when compared to those reliant on public chargers, so greater emphasis should generally be placed on providing the right incentives for private users to feed back into the grid.

3. Interoperability & data integration

For the e-mobility ecosystem to work as intended, standards of data interoperability and roaming must be common across member states. Different standards throughout the Union defeat the purpose of smooth roaming, as they create the potential for varying levels of interoperability. For this reason, technical protocols that enable roaming should be mandated for, rather than obligating operators to participate in roaming agreements which leave the door open for gaps in standards across Europe.

In support of this, Eurelectric recommends Open Charge Point Interface (OCPI) as the standard for API integration as opposed to DATEX II, as it supports connections between e-mobility service providers (eMSPs) and CPOs, allowing EV users to access different charging points and streamline payments across jurisdictional borders. It is already widely used throughout Europe's charging sector, while DATEX II is more suited to traffic management and transfer of travel-related information.

The fragmentation in data requirements and formats for National Access Points (NAPs) has also created significant administrative burdens and undermined market integration. Alongside data simplification and the harmonisation of formats, there should be greater integration and coherence between national platforms and access points to avoid duplicative requirements at the EU and member state-level.

In this way, **a Single European Access Point for infrastructure data could eventually be implemented**, which would enable the easy and efficient access to the necessary data to all members of the e-mobility ecosystem. This would centralise reporting, reduce costs, and enhance cross-border interoperability between the e-mobility infrastructure of one member state to the next.

4. Consumer experience & payment systems

The smooth and seamless operation of the charging network is crucial to the success of BEV uptake, as the switch from an ICE vehicle to electric is a decision that consumers only want to make once. AFIR should be utilised to make this movement to electric as easy as possible, assuaging concerns around the ease of finding and using a

⁴ [ISO Standard 15118-20](#)

charger suitable for their needs. Alignment with broader energy market design and grid planning obligations is recommended, so that charging infrastructure can be designed to contribute to flexibility and provide benefits to the EV owners. The use of the charging infrastructure – including the BEVs on it – should be seen as assets for the grid, not a hindrance.

Many perceived barriers to the move to EVs from ICE vehicles stem from concerns regarding the ease with which they will be able to find a charging point, use it easily, and pay for the service. **Reducing any friction points for the consumer is essential to providing a quick and accessible experience** that will encourage the frequent and widespread use of the charging infrastructure that we are asking to be put in place.

The existing provisions in AFIR that mandate ad hoc (without a subscription) payment at public recharging points should be kept, as well as the provision in AFIR to retrofit, from 1 January 2027, recharging points with a power output equal to or more than 50 kW deployed along the TEN-T road network or located in a safe and secure parking area with card readers or devices with contactless capabilities.

That said, full flexibility in choosing from appropriate ad hoc payment methods by the operator should be maintained, depending on the given situation. This aims to strike a balance between having an appropriate standard of infrastructure, while still enabling CPOs to rollout chargers more cost effectively, which is currently crucial for the nascent industry that must provide a substantial number of chargers with a smooth customer experience.

In addition, price transparency is important for consumers, and AFIR already mandates that CPOs must share real time information regarding clear pricing per kWh and any fees before the charging starts, and DC chargers must display the tariffs directly on site. **Eurelectric supports these provisions but would caution against unnecessarily mandating the disclosure of every price component**, as this may reduce the capacity for innovation and provide needless detail that could instead become more confusing for the consumer. It should also be noted that this is not done for traditional fossil fuels and therefore would not serve as a form of familiar continuity for the consumer but instead only add complexity.

Along with this, the EU should caution against restricting dynamic pricing models, as these are essential for smart charging and reflect the electricity demand on the grid, incentivising use away from peak times and therefore aiding in peak shaving instead of aggravating any strain on the grid at peak usage times. This both incentivises consumers to charge their EV during periods of abundant renewable electricity while maintaining a strong business case for the CPO. Any restriction on dynamic pricing for charging services would be neither market-based nor technology-neutral and would constitute a clear double standard when compared to the fully market-driven pricing framework applied to fossil fuels.

5. Funding & grid planning

The Alternative Fuels Infrastructure Facility (AFIF) is a crucial funding tool for public charging infrastructure in its early stages, especially in rural locations with low utilisation rates. However, after funding was exhausted in late 2025, a gap now exists with no confirmation of a funding renewal.⁵ The coming years will be a period of critical growth for the charging ecosystem in Europe, and policymakers should not risk a drop in rapid progress due to an avoidable lack of EU financing.

This challenge is even more acute for HDV charging infrastructure, where deployment must take place ahead of large-scale fleet uptake. HDV charging hubs currently face very high capital costs and low short-term utilisation, meaning that without targeted measures, many projects will remain commercially unviable until heavy-duty vehicle fleets scale up, despite being essential for the decarbonisation of road freight.

We therefore call on the Commission to:

- **Update and reinforce AFIF for 2026 and beyond**, ensuring that the growth of the European charging network is not stunted by a lack of funding at this vital stage of development.
- **Maintain the expansion of charging infrastructure as the primary goal of AFIF funding, while allowing upgrade and refurbishments to existing infrastructure** in regions where expansion is neither necessary nor appropriate (e.g. mature passenger car markets, Megawatt Charging Systems for HDVs, battery storage systems).
- **Address specific funding needs of HDV infrastructure by introducing an EU-backed guarantee scheme** - complementing AFIF or other EU financial instruments - to mitigate early-stage market risks and mobilise private investment in heavy-duty charging hubs.

As AFIR mandates for the development of the charging network, power demand from the grid will increase significantly amidst other key sectors electrifying. **Thus, there must be a stronger alignment of AFIR provisions and national grid planning.** Specifically, the sharing of Member States' NPFs with local grid operators could assist earlier in the planning of expected grid demands and where connection requests are expected.

It is also important under AFIR to urge Member States to do everything possible to shorten the time needed to install and activate charge points. In particular, permitting should be faster, as different approvals are often required from national, regional, and local authorities.

In the recently published Grids Package, recharging stations are explicitly designated as infrastructure with 'Overriding Public Interest' (OPI), allowing for the fast-tracking of administrative permits. Although Eurelectric welcomes this designation, DSOs will continue to carry out thorough assessments for each connection request, and connection timelines will still depend on local network constraints and the specific circumstances of each project.

⁵ [CEF - AFIF call for proposals closed](#)

Lastly, greater coordination is necessary and National Regulatory Authorities should take on a more active role in enabling proactive grid developments and removing bottlenecks.

Conclusion

AFIR has provided the long-term visibility needed to accelerate the rollout of public charging infrastructure across Europe. The upcoming review should therefore focus on **targeted, practical refinements that strengthen implementation without undermining regulatory stability or disrupting investment already underway**. Eurelectric calls for maintaining the existing approach to target-setting while acknowledging HDV-specificities, ensuring feasible timelines for key technical standards, and improving interoperability through harmonised data and roaming protocols.

At the same time, the review should safeguard a frictionless consumer experience through workable payment and transparency rules, while ensuring continued funding through AFIF to provide support where market conditions still require it. By keeping the ambition of AFIR intact while improving feasibility and coherence with the wider energy system, **the EU can deliver charging infrastructure that is scalable, user-friendly, and investment ready for this crucial phase of growth for the electrification of transport.**

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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