

Key recommendations

The Platform for Electromobility calls for an ambitious revision of the Alternative Fuels Infrastructure Directive (2014/94/EU, AFI) consistent with the EU Green Deal

February 2021

An ambitious revision of the AFID is vital to accompany and boost the electrification of transport and reduce GHG emissions as requested by the EU Green Deal and the EU Smart and Sustainable Mobility Strategy. The current AFI Directive was adopted at a time the market for alternative fuels was still an emerging market. Europe must now equip itself with the right public and private charging infrastructure to support the surge of electric vehicles (EVs) and the transition to a zero-emission mobility.

In this context, the Platform for Electromobility calls for:

EXTENDING THE SCOPE OF THE DIRECTIVE

Given the EC's goal to reduce EU GHG emissions by 55% by 2030, the revised AFID must incentivise the uptake of low and zero emission vehicles.

Key actions:

- Prioritise the electrification of transport as the most effective and efficient pathway compatible with the objectives of the EU Green Deal and the decarbonisation of mobility. In particular, the Platform underlines that the decarbonisation of the transport sector cannot be achieved with the fossil fuels still supported in the current AFID.
- Set minimum mandatory targets for the availability of recharging points in all public parking facilities from 2025 (e.g. supermarkets, shopping malls, car park operators etc.).
- Introduce an updated definition of charging points based on their power levels to the existing one, i.e. ultrafast (≥150 kW) and fast charging (22-150 kW). Criteria for minimal requirements should embrace the number of points, charging power, ratio to the number of EVs. The market should decide the most useful power level to apply.
- Apply the revised directive also to charging infrastructure for Heavy Duty Vehicles (HDVs) (trucks and buses), electric charging for two wheelers and rail infrastructure. For HDVs, the specific charging needs of electric trucks should be addressed by introducing requirements for the roll-out of public charging infrastructure and electric road system for electric heavy-duty commercial vehicles (vans and trucks) in medium and large urban areas by 2025, as well as along the TEN-T Core Network.
- Require Member States to propose to the EC a decarbonisation strategy for their rail system, identifying the
 alternative fuels that they intend to make available on the parts of their network that are neither electrified nor
 mandated to be electrified under an existing EU regulation. In particular, MS should include in their strategy a
 plan to replace current refueling facilities as defined in point 2.(i) of Annex II of the Directive 2012/34/UE "Recast".
- Revise consistently the AFID and the Energy Performance of Buildings Directive (2010/31/EU, EPBD) to ensure the same level of ambitions in both texts. The way article 8 of the EPBD imposes an obligation for the deployment of charging infrastructures in non-residential buildings may have an impact on publicly accessible charging infrastructure since some non-residential buildings are open to the public such as malls. Besides, the EPBD should address the issue of private charging in all types of buildings as it is also important for the development of electromobility.



SETTING MINIMUM BINDING TARGETS for the deployment of publicly accessible charging infrastructure

Key actions:

- Introduce minimum binding targets per Member States on the number of public chargers deployed per type of transport (Light Duty Vehicles, Heavy Duty Vehicles) starting in 2025. Minimum binding targets should also be set for the deployment of charging infrastructure for airport infrastructure for ground movements and onshore power supply or boat 'refuelling' in maritime and inland ports.
- Develop an EU methodology to set the binding targets introducing penalties in case targets are not satisfied. These targets should ensure that – at the minimum – the EU objective of 1 million public chargers in 2025 and 3 million in 2030 are reached. The penalties of each MS should be reinvested at national level for zero-emission mobility measures (like funds for electric infrastructures, public subsidies for EV uptake in favour of citizens or businesses like purchasing aid or fiscal measures etc.).
- Establish a new bottom-up EU metric considering the charger power level of charging points, the number of EVs, assessing locally the right geographical coverage of infrastructure (via geographic, traffic and density criteria) and including the level of access to a private charging infrastructure. Given that two thirds of cars are parked overnight on the street (or public car parks), EV users living in condominiums, in particular, should be able to benefit from a public charging point in their residential area when it is not possible to install a charger in their building.
- Empower local authorities to take clearer and simpler administrative procedures to install public charging infrastructure.
- **Request Member States to decarbonise the non-TEN-T part of the rail network**, through further electrification, where economically feasible, or through battery and hydrogen powered trains.

ENSURING CONSISTENCY between the AFID and the TEN-T Core and Comprehensive Networks

The EC should revise the TEN-T guidelines in line with the requirements of the revised AFID.

Key actions:

- Make the minimum target of one charging point/60 km mandatory, as defined in the TEN-T Core Network for both TEN-T Core and Comprehensive Networks by 2025 to make the EVs convenient for long road journeys and ensure the coverage of the TEN-T Networks with ultra-fast chargers, including urban fast charging hubs.
- Align the TEN-T high-power recharging infrastructure requirements with the electricity development plans.
- Focus on the part of the main line rail network which is not part of the TEN-T as well as nodes on the Core and Comprehensive networks (ports, multimodal terminals for example).

DEVELOPING SMART CHARGING

The Platform emphasises the capacity, in general, of electricity system operators to integrate EVs even with an ambitious target for 2030¹. However, in some places of Europe this would require the adoption of smart-charging

¹ In France, the French DSO Enedis has concluded in a report that the needed investment to integrate EVs into their grids will only represent 10% of their total investment by 2030 (cf. Enedis, <u>Report on the integration of electric mobility in the public electricity</u> <u>distribution network</u>, November 2019)



strategies to optimise network investment and, potentially, reduce the need for grid reinforcement. The Platform underlines that smart charging should be developed in accordance with the evolution of mobility needs of EV users and with their consent.

Key actions:

- Introduce a definition of "smart charging" as charging of an EV which facilitates the security (reliability) of electricity supply while meeting the mobility needs of the user. The definition should serve as basis and be referred to in other legislations. It should be coherent with already existing legislations supporting the integration of EVs in the power system (e.g. electricity regulations on the role of DSOs).
- Ensure that publicly accessible normal charging points (<22 kW) installed from now on are smart and future proof. This requirement should specifically apply in residential areas and cities where people may have limited access to private charging points.

GUARANTEEING INTEROPERABILITY via a user-centric approach

The electricity charging infrastructure should be interoperable to provide seamless EV charging experience to the users through the use of open and compatible standards and open and shared data on information, location and availability of chargers as well as price transparency to deliver more intelligent services such as smart charging, roaming of service and common ad-hoc payments (at least at national level). The EC should provide a harmonised framework for product and security requirements for charging and data exchange at the different interfaces without excluding technology already in the market.

Key actions:

• **Put in place interoperability principles** for the operation of various technical standards and protocols on the market to promote a competitive market environment and improve user experience.

ENSURING A STRONG IMPLEMENTATION OF THE DIRECTIVE

To ensure the rapid and strict implementation of the binding targets and provisions set in the revised AFID, the EC should tighten the EU monitoring and further involve the local level.

Key actions:

Consult with local authorities and distribution system operators when developing National Policy Frameworks or strategies to implement them.

- **Create independent national reporting authorities within Member States** (such as National Energy Agencies) in order to strengthen EU monitoring of the implementation Member States' target.
- Turn the AFI Directive into an ad-hoc EU Regulation for road transport infrastructure to ensure a strong, rapid and more uniform implementation in all Member States. However, considering other modes of transport (inland waterways, maritime transport) for which alternative fuels are less mature, the directive should remain the preferred regulatory tool.