

**Platform for electromobility's reaction paper to
the Commission proposal for the revision of the Renewable Energy Directive**

November 2021

The Platform for Electromobility welcomes the timely revision of the Commission's proposal for the RED (Renewable Energy Directive). This will be key in supporting the EU in reaching carbon neutrality, notably by advancing the case for an electrified, decarbonised and efficient transport sector. In fact, clean direct electrification is the most cost-effective way of decarbonising Europe and reaching the 2030 and 2050 climate targets.

Moreover, direct electrification of transport has accelerated in recent past years, and the pace is only expected to increase. According to a recent BNEF [study](#), in order to reach 100% CO2 emissions reduction by 2035, some 67% of passenger cars sales in Europe will need to be electric by 2030.

This rapid, massive uptake of EVs has the potential to become - thanks to smart charging - a flexible asset for grid management and an opportunity for prosumer business models. It will also provide a boost to the increased and cost-effective penetration of renewable energy in the electricity system. The combination of EVs, their batteries and smart charging functionalities as sources of ancillary services for the distribution grid will clearly bring benefits in terms of RES (Renewable Energy Sources) integration. Electromobility and renewable energy therefore offer a win-win partnership.

In this context, the Platform welcomes the recognition of smart charging and, where appropriate, bidirectional charging for integrating transport in the energy system. Two aspects in particular stand out; 1) the relevance of the charging points located at long-time-parking spaces, and 2) that national regulatory frameworks do not discriminate against electric vehicles participating in the electricity markets.

However, we do believe there are certain key aspects that can still be further reinforced within the Commission proposal. These will help support EV uptake and lead to swifter decarbonisation of both the transport and energy sectors:

1. Greenhouse Gas based mandate

The Platform for electromobility raises concerns over the shift from an energy-based target for transport to a greenhouse gas (GHG) metric. If we support the fact that a threshold expressed in terms of GHG provides a relevant tool for accelerating the decarbonisation of transport while guaranteeing technology neutrality among low-carbon technologies, it may - within the framework of the RED - add complexity to the metric. Furthermore, it does not seem to bring any genuine added value to boosting renewable energy when compared to the existing framework. In fact, multipliers are implicitly integrated in the GHG-emission calculation method, and the GHG-emission based target of 13% is equal to the 24-26% in final energy consumption considered by the European Commission in its public consultation.

Furthermore, given that currently 24 of 27 Member States implement an energy-based target, it should be noted that using such a metric will have an impact on the current implementation of the Directive; these countries will have to start from scratch again, having just finished transposing the current RED II. This could result in delays in meeting the RES-T target and the overall EU binding RES target. France, for example, is currently working on the implementation of its credit mechanism, aimed to have this enter into force by 2022 using an energy-based RES-T target. With the switch to an emission-based target, France would have to revise its credit mechanism almost immediately following its implementation, leading to further delays.

Platform Members therefore invite the Commission to provide further information on its motive and rationale behind introducing a new GHG emission-based transport target.

2. Inclusion of electricity in national compliance mechanisms

The Platform is pleased that the proposal levels the playing field between biofuels and electricity by including electricity in national credit systems for fuel supplier compliance. This is a feature of the Directive that we called for in an earlier [communication](#). The proposal shall as well ensure level playing fields between zero emissions options, especially between electricity for BEVs and RFNBOs. For instance, hydrogen can claim credits for private charging while renewable electricity for electric vehicles is restricted to public recharging stations only.

Focusing specifically on ‘public’ recharging points is discriminatory and inefficient. This is because it excludes some 80% of electricity supplied to road vehicles and provides incentives for people to charge their cars at public charging points rather than at home, as well as for companies not to charge their trucks and buses at their depots. The scope of the electricity credit mechanism should therefore be expanded to include recharging stations more generally, encompassing both public and private ones. It should also be possible for such a credit mechanism to also be applied to other types of transport such as rail, aviation or shipping.

The text is unclear as to whether it would apply to charge point operators (CPOs) alone, or whether it would also apply to electricity suppliers. Within the current proposal, this could lead to a situation with different incentive schemes resulting in confusion amongst actors and the relevant incentive schemes.

3. Permitting

The Platform supports the Commission’s proposal to tackle the remaining barriers, including those relating to permitting procedures. We welcome in particular the proposed publication of a guidance on best practices to accelerate the permitting of projects. We urge the European Commission to publish such a guidance swiftly and ensure the best practices are disseminated to local authorities. Nevertheless, the review of permitting administrative procedures must be urgently addressed in the short term in the RED III and not be left until 2024. This will be key to preventing bottlenecks that may hinder the achievement of national RES commitments and the deployment of renewable installations more generally. We also recall that this should be done in cooperation with grid operators in order to preserve the security/stability of the grid.

4. Coherence with the Alternative Fuels Infrastructure Regulation (AFIR) and the upcoming revision of the Energy Performance of Buildings Directive (EPBD)

The Platform calls for ensuring the consistency of the RED III with the new Regulation on the deployment of alternative fuels infrastructure. The current definition on smart charging and bidirectional recharging should be aligned and any change to the related definitions and provisions in one text should be made in the other.

Furthermore, given that the European Commission has integrated provisions on the private charging points regarding smart charging in the RED III, we would like to underline the necessity of ensuring their coherence with the upcoming revision of the EPBD, which addresses private charging in its Article 8.

5. Coherence with Battery Regulation

On the data-sharing requirements relating to batteries, the Platform recommends ensuring consistency with proposed requirements under the EU Battery Regulation proposal and avoiding any duplication. For example, new performance and durability requirements for batteries are already included in Article 10 of the Battery Regulation proposal.¹ Similarly, the information on the state of health of the battery is included in Article 14 of the proposal.²



¹ The UNECE has recently [developed](#) performance and durability requirements via GTR, and therefore may be directly applied by the EU.

²This is also regulated by UNECE GTR on in-vehicle battery durability, namely 'State of Certified Energy' (SOCE), or capacity fading, and 'State of Certified Range' (SOCR).