

## Platform for electromobility's recommendations to trilogue negotiators on EPBD

October 2023

In 2023, battery electric vehicle (EV) sales reached a milestone, accounting for 15% of total sales in the European automotive market. At the same time, about 25% of bicycles sold are e-bikes. These positive trends are expected to continue, driven by ambitious EU objectives and legislations and national recovery plans.



To ensure the success of Europe's transition to zero-emission mobility, the deployment of private charging infrastructure is of utmost importance, given that 75% of all charging takes place at home or in the workplace. While the EPBD consider the upcoming needs of electromobility, we believe that safeguarding the strongest agreements are needed to establish the right conditions for widespread EV adoption.

The Platform for electromobility fully supports the revision of the EPBD, particularly the introduction of Article 12, which focuses on electromobility infrastructure in buildings. We commend to preserve provisions that guarantee a strong and coherent right to plug in all buildings, remove regulatory barriers, and require smart charging-readiness for new and renovated chargers, among other measures.

As the EU institutions start trilogue talks, it's clear the European Parliament wants more than the Council. But the many exceptions for installing infrastructure could make things confusing and inconsistent across Europe, we would like to present five additional recommendations:

### **1. Clarify the scope of application of Art 12**

The current wording could be interpreted restrictively. We seek clarification to ensure that requirements apply to parking spaces both adjacent to and inside buildings.

### **2. Ensure charging solutions in existing buildings**

Given that a significant portion of existing buildings will remain in use by 2050, we propose extending the scope of Article 12 to require clear and transparent rules for EV charging points in existing buildings. Incentives and compliance mechanisms should be introduced.

### **3. Complete charging requirements for new and renovated buildings**

Extend requirements to cover depots, logistic hubs, and distribution centres, ensuring they are ready for future EV charging.

### **4. Reinforce smart charging functionalities**

Mandate that all newly installed chargers in buildings are capable of smart charging. Ensure consistency in definitions and provisions with related regulations and recognize the value of mobile storage.

## 5. Reinforce measures to ensure pre-cabling

Provide an explicit definition of pre-cabling, inform about readiness in Energy Performance Certificates, and simplify permit and installation procedures. Address administrative hurdles and encourage Member States to financially support EV charging installations.

## 6. Ensure adequate bicycle parking:

Opt for bicycle parking to represent 15 % of total user capacity in non-residential buildings, and with space required also for bicycles with larger dimensions than standard bicycles.

## 7. Reject opt outs for SMEs

98% of all commercial enterprises are SMEs, therefore the Directive would no longer apply to 98% of commercial non-residential buildings. This is a tool that is too moderate.

## 8. Re-ensure provision on Right-to-plug

The Right-to-plug lowered since in point 8 both co-legislators mentioned a “request by tenants or co-owners to install CPs can only be refused if there are serious reasons for doing so”. This could weaken provision on Right-to-plug, giving the possibility to landlords and condominium assemblies to refuse the Right-to-plug and install a charging infrastructure in not so clarified cases. We call to remove or clarify the point 8.

## 9. Preserving precabling

In contrast to prevailing targets, where the European Commission's proposal advocates for 100% precabling, the Council suggests a balanced approach of 50% precabling and 50% ducting. Additionally, in the case of new and renovated residential buildings, the Parliament recommends a complete shift towards 100% ducting if 100% precabling is deemed unfeasible. However, we propose retaining the precabling targets in alignment with the European Commission's proposal. This approach ensures the preservation of cost-efficiency in future installations and reinforces the fundamental right to access plug-in infrastructure.

Now, it's crucial for policymakers to act and make sure that every European can charge their electric vehicles at home and work, be it an EV or an e-bike. This is where most EV charging happens already. By doing this, we can make EV charging available to everyone and fully harness the environmental benefits it offers, contributing to the development of an energy system powered by renewables.

