From targets to consumer-friendly deployment of publicly accessible charging points for EVs

Our recommendations for a targeted revision on the
Alternative Fuel Infrastructures Regulation (AFIR)

DECEMBER 2025

A strong infrastructure is Europe's backbone toward electrified transport. The deployment of both public and private charging infrastructure has made significant progress in recent years, yet the road ahead remains paved with uncertainty.

Charging infrastructure operators are concerned by the doubts raised on the future of the electric shift, which puts their business model at risk and jeopardizes the investments required to sustain the continuous ramp up of Electric Vehicles (EVs). Car makers are concerned as consumers keep citing charging as a key pain point preventing them from going electric. Consumers, on their side, can be tempted to delay EV adoption in front of growing attempts at putting into question the transition itself.

To secure the consolidation of a robust European EV ecosystem and create a healthy market dynamic, EU policymakers must ensure that the conditions are met, adopting a holistic approach to infrastructure deployment, in order to address the needs and business models of all stakeholders, ensuring that public policy choices

WHAT IS THE PLATFORM FOR ELECTROMOBILITY?

A unique alliance of Europe-based producers, infrastructure managers, operators, transport users, cities and environmental civil society organisations from across industries and transport modes, collaborating to reach a sustainable, multimodal transport system in which people and goods are moved across land in Europe using exclusively fossil-free electricity. We unite all sectors constituting the electromobility ecosystem to pragmatically ensure the conditions for the full decarbonation of new light-duty vehicles by 2035, and build a sustainable European zero-emission transport system by collectively sharing their expertise, challenges and solutions.

do not place the financial burden of the transition on any individual sector alone; and to consider AFIR in the broader perspective of the overall charging ecosystem and customers' charging experience, ensuring consistency and comprehensiveness between AFIR and Energy Performance of Buildings Directive, and electricity grids framework.

First, this requires a facts-based and holistic approach, to objectively review the assumptions on which the current regulatory framework for rolling out the charging infrastructure is built.

Second, adequate measures need to be framed accordingly. Those include: (a) reinforcing investor confidence without jeopardizing the long-term clarity on CO2 emission reduction trajectory to 2035; (b) supporting EV demand and massification to put more EVs on Europe's roads quicker; (c) incentivise proactive public authorities action to support and create a viable business case for EV charging infrastructure providers; (d) kick-starting the market where demand is still emerging with public investment to bridge the gap allowing the charging market to work as a demand-based market; (e) taking actions to increase consumers' confidence and familiarity with charging the EV technology and charging at large.

Finaly, beside AFIR review, wide measures will be needed under various EU and national frameworks to further develop charging networks notably in urban areas, in private parking of multi-dwelling buildings, and in less commercially viable locations.

Within this broader framework, the forthcoming review of the AFIR should be seen as an opportunity for more targeted improvements.

It can notably remove some barriers and improve consumer- and grid-friendliness of infrastructures on Europe's roads, with a specific attention to charging infrastructure for trucks. AFIR can also be instrumental in enhancing the customer experience by supporting reliability, seamless interoperability, and greater choice to reflect the diverse mobility needs of European citizens. AFIR can foster quality and availability of charging points by enabling a competitive and well-functioning market.

Ahead of the review of AFIR in 2026, the members of the Platform for Electromobility put forward 10 targeted recommendations to support a swift, consumer-friendly, and demand-driven deployment of charging infrastructure in Europe.

THREE OBJECTIVES
ELEVEN RECOMMENDATIONS

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Objective 2 | A truly European ecosystem

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Objective 3 | A consumer-friendly ecosystem

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This paper was elaborated by the Working Group Energy & Infrastructure of the Platform for Electromobility, chaired by Paul Wilczek (Head of Sustainability, Eurelectric). Platform Secretariat would like to thank all the members who contributed to this document.

Objective 1 | From Targets to Deployment

Recommendation 1

Maintain, Expand, and Simplify Funding

Alternative Fuels Infrastructure Fund (AFIF) has been vital for early-stage infrastructure, especially in rural or low-utilisation areas. Funding will likely run out after the June 2025 cut-off, risking a gap in 2026–2027 during a critical growth phase.

We recommend to:

- Keep urban nodes as a central component of Connected Europe Facility (CEF) to ensure finalisation of TEN-T charging infrastructure in cities.
- Include grid connection costs, including smart charging feature and (where suitable) V2G, in eligible funding.
- Simplify access by aligning timelines to match permitting and grid connection processes, allowing flexible site selection and financing models, and reducing administrative burdens.

Recommendation 2

Maintain a Market-Based Approach for Targets

The current kW/BEV approach remains a reliable and market-driven framework for ensuring functional infrastructure deployment. AFIR's combination of capacity-based and distance-based targets balances market responsiveness with strategic coverage: Capacity-based targets align charging deployment with actual EV adoption, supporting efficient investment and coordinated planning of power grids reinforcements; while distance-based targets ensure network coverage along major corridors providing driver confidence needed to switch to EV and travel confidently throughout Europe.

We recommend to:

- for Light-Duty Vehicles (LDV) charging infrastructure targets, retain the capacity-based approach while
- Monitoring that market-based targets enable the continuation of deployment on both public and private side, including most difficult segment to address such as multi-family homes.
- Monitoring utilization uptake and uptick considering public support when necessary to accompany the EV uptake.
- Regarding the distance-based targets, establish mechanisms to enable the deployment of high-

power charging infrastructure in areas where market conditions alone may not ensure sufficient coverage. This will ensure adequate coverage across all the TEN-T network.

- Regarding the distance-based targets for HDVs, support the deployment of high-power charging infrastructure for heavy-duty vehicles along the TEN-T comprehensive network by creating enabling conditions, such as financial incentives, investment support, and mechanisms to de-risk investments.

Recommendation 3

Concession tendering & permitting for faster and simpler charging deployment

In many Member States, the main barrier to deploying charging points is the lengthy administrative process due to the high number and processing length of required permits. Given the European Commission's competencies, AFIR should urge Member States to simplify and significantly shorten installation timelines, including those for the necessary electrical infrastructure.

We recommend to:

- Improve coordination with local authorities and with power grids developments to ensure chargers are placed where they provide the greatest value for the final user and the greatest synergy with grid hosting capacity.
- Streamline tendering and permitting processes for both charging stations and related grid infrastructure to speed up deployment.
- Improve tendering rules to avoid risk of monopoly/oligopoly.
- Refer to the STF guidelines for tendering.

Recommendation 4

A grid-supportive ecosystem

For a smoother and efficient deployment of EV charging infrastructure, coordination with grid operators (DSOs for medium voltage and TSOs for high voltage) must be fostered, in terms of location, size, type of electricity connection, services provided, etc. Smart charging features and, where feasible, V2G should be incentivised, as necessary enablers of providing both flexible load and active grid services. Planning coordination and smart charging can increase the grid hosting capacity, avoiding bottlenecks in connection processes and grid congestion which could impair a fully-fledged service to EV drivers.

For the charging sector to play its part in delivering flexibility, charging infrastructure operators must be

able to dynamically optimize charging sessions, making the requirement in Article 2 of AFIR for public recharging points to be 'digitally connected' a key provision, in terms of services to both EV drivers (real-time information on different charging options ahead) and to grid operators (quasi-real-time information on grid conditions). For charging infrastructure operators, this is an additional leverage for optimising their energy costs and therefore the dynamic tariffs applied to EV drivers, to the benefit of the overall energy-transport integrated ecosystem.

Recommendation 5

Interoperability to avoid stranded assets

Avoiding stranded charging infrastructure is an important goal. We support consideration of all factors to ensure interoperability between digital systems and physical infrastructure to avoid situations where, if a CPO exits the market, charge points are left unusable. We encourage to utilise common standards also for smart charging in order to enhance the value of charging points for both the transport network and the electricity network.

We recommend to:

- Formalise a standard to ensure interoperability and protect investments. Any such requirements should be phased in and not apply retroactively.

Objective 2 | A truly European ecosystem

Recommendation 6

Ensure Member States deliver through the AFIR National Policy Framework

Member States are currently preparing their National Policy Frameworks for the development of the market as regards alternative fuels in the transport sector, including all modes, and the deployment of the relevant infrastructure, according to AFIR art. 14. By 31 December 2025, each Member State shall draft its final national policy framework in an easily readable and understandable form and notify it to the Commission. Consequently, the Commission shall assess the draft national policy frameworks and may issue recommendations to Member States.

We recommend:

- the Commission to monitor closely Member States' elaboration of their Policy Framework to ensure that the obligations and objectives of AFIR art. 14 are respected and fulfilled.

Recommendation 7

From fragmented National Access Points to coordinated European access

National Access Points (NAPs), first established and mandated in the ITS Directive, were introduced under AFIR as a key mechanism to ensure transparent, accessible, and harmonised EV charging data across Member States. However, their implementation has so far been fragmented, with differing requirements across countries creating usability concerns, compliance costs, and inefficiencies for industry and users. NAPs already exist and should be leveraged during the transition phase to better reflect and support industry needs through a bottom-up approach.

We therefore recommend reinforcing and harmonising NAPs while enhancing coordination at European level by:

- Requiring, as a minimum, that Member States implement fully AFIR requirements and do not create obligations for other/additional data points than those specified in AFIR.
- A clarification by the Commission on the applicability of the penalties considered under the Data Act will be welcomed.
- To avoid redundant reporting and reduce administrative burden for operators, integration between existing national platforms and National Access Points (NAPs) should be allowed and duplications

should be avoided.

- Supporting closer coordination between Member States to eliminate compliance costs due to fragmentation.
- Encouraging the European Alternative Fuels Observatory (EAFO) to act as a central reference point, serving as a metadata catalogue that links users with the relevant national data sources.
- Promoting interoperability of existing systems across borders and better integration into EU digital and energy strategies (e.g. the Data Act, smart grid integration).
- Ensuring cooperation with other EU-level initiatives like NAPCORE to gradually build the foundations for a de facto European access layer interlinking all NAPs.
- In the longer term, the system should evolve toward a single European Access Point not merely a gateway to national platforms, but a true one-stop-shop and unified connection point for all CPOs.

Recommendation 8

Creating truly single market for charging stations equipment

The revised AFIR and corresponding EU legislations[1] should address the persistent national barriers that continue to hinder the sale and installation of charging stations across Member States. These regulatory discrepancies fragment the internal market, slow down infrastructure deployment, and ultimately increase costs for end users. In practice, it can sometimes be easier to sell and install a station designed for the Belgian market in the United-Kingdom than in Germany or France.

- To overcome this, the revision should introduce an equivalence principle ensuring that a charging station compliant with the regulations in one EU country can be sold and installed in any other Member State without additional national requirements, in line with the EU's mutual recognition framework.

[1] For example but not limited to: on AC stations, the French shutter (obturateur) mandate, and French type E mandates; the MID deviation (e.g Eichrecht in Germany); and the Austrian OVE Richtlinie R37.

Objective 3 | A consumer-friendly ecosystem

Reassuring the consumers on the availability and usability of EV charging infrastructure all across Europe is key to increase EV uptake. This is why one of AFIR's core objectives is and must remain to ensure comprehensive user information and adequate payment options at alternative fuels infrastructure. Thanks to Article 5, significant progress has already been made, and tangible results are emerging. In the upcoming AFIR review, we encourage the Commission to envisage a balanced approach, considering: enhancing the consumer experience, optimising infrastructure deployment and operation costs, supporting innovation in technology and services, and enabling the evolution of sustainable business models in this emerging industry, including the provision of grid services as supplementary revenue stream.

Recommendation 9

Balanced rules for transparent, consumer-friendly EV charging prices

AFIR Article 5 has introduced price transparency provisions by setting clear rules for pricing display and structures, particularly for ad-hoc charging. However, as EV adoption grows, price transparency is becoming an increasingly sensitive topic.

Addressing transparency issues remains a priority for the EV charging industry. However, it is worth noting that some driver frustration stems from the diversity of business models (e.g., the growing role of EMSPs) in a still nascent industry, a reality that differs fundamentally from the traditional 'refuelling'. In terms of price transparency, the main concern is inconsistent enforcement at the national level. The challenge lays in the inconsistent and non-harmonised enforcement of existing rules at national level. National regulators should respect AFIR's legal value as the superseding legislation and refrain from diverging interpretation, rather prioritising harmonized implementation of existing rules rather than introducing additional regulatory burdens.

We support the principle in Article 5(3) allowing differentiated pricing when it is "proportionate and objectively justified." However, the absence of interpretive guidance has created legal and commercial uncertainty. To improve consistency across Member States, the Commission should continue to provide guidance to clarify how this principle should be applied in the 2026 revision. Ensure necessary clarification to preserve commercial flexibility for CPOs and MSPs, avoid undermining MSP business models, ensure competitive pricing strategies remain viable, and ensure no unjustified price disparities. Non-binding examples or criteria would reduce market risk, foster stronger cooperation between

charging providers and EMSPs, and support more cost-effective, user-friendly charging for consumers.

Recommendation 10

Ad-hoc Payment & Access to ensure simple and reliable EV payments

Transparent and user-friendly payment systems are central to driver trust and convenience.

We recommend to:

- Keep the existing requirement for ad hoc payments at publicly accessible charging points unchanged to maintain legal certainty for operators who have been implementing solutions for AFIR compliance. As required by AFIR before 2027, CPOs are actively responding to AFIR by retrofitting all existing fast-charging points (≥ 50 kW) on the TEN-T network, as well as safe parking areas, with payment terminals or contactless devices.
- For chargers < 50 kW, and in charging point where physical POS retrofits are not mandated, retain flexibility to accept payment using internet connection such as those through QR Code, balancing cost efficiency with user experience.
- CPOs active exclusively in the e-HDV charging segment should be exempted from the ad-hoc payment requirement. All e-HDV charging is conducted by commercial fleets under pre-established contracts, not individual drivers. Unlike the passenger car market, there is no risk of stranded "walk-in" users in the e-HDV sector. Trucks operate under professional contracts, and operators expect and rely on negotiated service agreements.

Recommendation 11

Roaming & Contract-Based Access

Seamless access to charging is essential for building driver confidence and supporting EV adoption. This will be crucial also to manage grid capacity constraints and leverage the full potential of EVs as 'batteries on wheels'. These business models can help optimize grid use, reduce costs for the consumer, and ensure that charging infrastructure is accessible to a wide range of use cases including fleets, service providers, and individual drivers.

We recommend to:

- Ensure subscription-based charging is made possible by mandating the implementation of the protocols which enable inter-network communication.
- Promote Open data protocols for real-time kWh/kW data sharing with Mobility Service Providers in the B2C market.

PLATFORM FOR electromobility

Members of the Platform for Electromobility

More about the Platform for Electromobility

The Platform, a European alliance of over 40 EU-based producers, infrastructure managers, operators, users, cities and civil society organizations from across industries and transport modes. Driven by strong member engagement, the Platform advocates the acceleration of electrification of all modes of transport, focusing on its numerous benefits, such as emission reduction, efficiency gains, support for technological innovation, jobs and growth through value creation in Europe as well as reducing Europe's energy dependence from fossil fuel imports. The vision of the Platform for Electromobility is a sustainable, multimodal transport system in which people and goods are predominantly moved across land in Europe using sustainable electricity.

For more information about the platform please visit:
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Transparency register number: 071008240552-65