

Position paper

Recommendations for a better charging experience for electric car drivers



Why it matters to consumers

A consumer-friendly charging ecosystem is a precondition to the mass adoption of battery electric vehicles (BEVs). A growing number of charging stations are popping up in our cities, in parking lots and along EU's roads. Yet, frustrations are still there when it comes to knowing the price of your charging session in advance, trying to compare offers, juggling between payment methods and facing high prices in certain locations.

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BEUC, The European Consumer Organisation

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1. Electric car drivers benefit from a strong EU regulation...

Electric car drivers can be more and more optimistic about the availability of charging options on EU's roads. That is even more true as a new EU regulation (Alternative Fuels Infrastructure Regulation – AFIR) entered into force in April 2024, mandating sufficient charging stations for each European country.

With such deployment targets come requirements on price transparency and payment methods. AFIR, and especially its article 5, notably foresees that:

- Prices at publicly accessible recharging points shall be reasonable, easily and clearly comparable, transparent and non-discriminatory. All components of the final price should be known to consumers before they initiate a recharging session;
- Charging stations must offer safe, easy-to-use and widely used payment methods, allowing consumers to charge without entering into a contract with the operator or filling in personal data on an app.

Other provisions in AFIR address the potential issues between charge point operators and mobility service providers that are competing on their offers to BEV drivers.

1.1. ... But still face frustrating situations

BEUC members across the EU regularly point out the difficulties consumers face when using public charging stations.

The complex structure of the public charging market for electric vehicles is a source of concrete issues for consumers: lack of price transparency, numerous apps to allow for comparison, high prices, lock-in effects, ...

Publications from BEUC members show a wide range of issues:

- Our French member *UFC-Que Choisir* published an <u>analysis</u> of the French EV charging market, showing price disparities.;
- Studies from our <u>Austrian member</u> *AK Wien*, our <u>Norwegian member</u> *Forbrukerrdet* and our <u>Dutch member</u> *Consumentenbond* on the lack of price transparency;
- An <u>analysis</u> by our British member *Which?* on all the necessary apps and maps consumers need to be able to charge;
- An <u>example</u> from our member *vzbv* in Germany, where some consumers received a notification of price increase based on their charging behaviour.



- A <u>test from our Slovenian member</u> *ZPS* shows the different failures consumer encounter when trying to charge.
- Our UK member *Citizens Advice* <u>summarised</u> the main issues consumers face and a <u>recent survey</u> from our member Which? confirms this.

2. Growing interest from competition authorities confirm BEUC's concerns

BEUC members' research often point out issues derived from complex commercial relationships between charge point operators (CPOs) and e-mobility service providers (e-MSPs) (sometimes acting as both CPOs and eMSPs), or competition concerns leading to monopolistic situations, market concentration or abuse of dominant position.

Many competition authorities (along with the Commission <u>itself</u>) have also looked into the state of the public charging market for electric vehicles:

- Germany's Federal Cartel Office <u>called</u> in 2021 for more competition for charging infrastructure and Austrian regulators last year <u>warned</u> that the dominance of energy companies in that sector could result in anti-competitive practices. The Bundeskaterllamt published its final <u>report</u> mentioning clear competition concerns and abusive pricing.
- The UK Competition and Markets Authority has also <u>issued</u> recommendations to improve competition in the industry.
- The Swedish Competition Authority launched a feasibility study with the aim of identifying issues and areas that may be of interest for a market study on charging infrastructure and charging services from a competition and/or procurement perspective. A final report should be available soon.
- <u>Portugal</u>, <u>Denmark</u>, <u>Spain</u> and <u>France</u> have also looked at the electric vehicle charging network. A <u>study</u> in Portugal looked at the high prices of charging.
- In June 2025, the Czech Antitrust Office launched an <u>inquiry</u> into competition in the public charging station market



A CASE IN POINT: ITALY

What our member showed

Our member Adiconsum launched the Electric Mobility Charging Tariff Observatory in collaboration with TariffEV, an Italian grassroots app developed by consumers to help users identify the most affordable charging rates amid a crowded market of operators. On Adiconsum's website, you can find the latest analysis for February 2025, including monthly updated comparison tables. The Observatory aims to track pricing trends over time, foster competition, empower consumers with informed choices, and urge institutions to address the shortcomings of this emerging market. Three months into its operation, the findings are clear – and concerning: technological parity between fossil fuel refuelling and electric charging remains elusive. The cost per kWh at public stations is volatile and often exorbitant, and pricing lacks transparency. This opacity denies consumers the fundamental right to clear comparisons – a right universally upheld for fossil fuels.

Unlike traditional energy supply, electric charging is not recognised as a public utility service, in Italy. This creates a significant and unacceptable disparity, particularly given that the same operators often provide both services. As a result, issues or disputes related to charging cannot be addressed, for instance through conciliation, under the oversight of our Regulatory Authority (ARERA), but are instead treated as matters pertaining to any ordinary product.

What the Italian competition authority did

In April 2023, Italy's competition authority opened an <u>abuse of dominance probe</u> into Italian energy giant Enel over pricing that may aim to curb rivals for electric car charging.

In September 2025, the Authority concluded that Enel X/Enel X Way, charged a wholesale rate to other eMSPs making it impossible for them to compete with Enel's own eMSP (assuming the same level of efficiency). The Authority fined Enel €2.3m for anti-competitive practice.

This decision can have direct implications in how the provisions of AFIR are interpreted by other authorities. Most importantly, it can address issues consumer face, such as unjustified high prices, lack of competition and unclear pricing practises.



3. Enforcement and competition should support policy objectives

AFIR is setting clear objectives to protect consumers in the public charging market for electric vehicles. As it entered into force in April 2024, the effects of this Regulation are yet to be fully assessed. Yet, our members' tests give ground for improvements, especially in the areas of enforcement and competition law.

As the Commission is preparing for the review of AFIR in 2026 (and in particular when it comes to assessing the provisions related to payment methods and price transparency), BEUC shares a series of recommendations that would improve consumer experience when charging their electric cars.

3.1. Strong market monitoring

As foreseen by AFIR (Article 5.6), competent authorities are empowered to monitor the EV charging market. With concerns and potential risks well-identified by both BEUC members and competition authorities, they should push the boundaries of their power to promote the highest standards in the implementation of provisions related to consumer protection. This market monitoring should notably look at the following:

- Relationships between eMSPs and CPOs must be at the centre of these investigations, notably to prevent anti-competitive practices by vertically integrated CPO-eMSPs or unfair practises vis-à-vis independent eMSPs;
- Consumers should be protected against lock-in effects of subscription-based models (i.e. via "bundle" offers for consumers when buying an EV). Transparency of offers and free choice should always be guaranteed, well before consumers are in front of a charging station;
- Member States, regional and local authorities should introduce competitive public tendering procedures and avoid creating monopolies when granting contracts to CPOs. They should also be leading examples by setting up price transparency requirements and encouraging reasonable prices for local residents;
- The Commission guidelines on payment by QR code indicate that such QR Code option should be interoperable, EU-wide, and should link to a direct payment service. These guidelines must be strictly enforced, and the principle of ad hoc payment respected (see section 3.3);
- The role and added value of certain eMSPs should be looked at. For average mileage drivers or those driving occasionally, ad hoc prices can be a better option, and some price differences appear unjustified for the same level of service. Yet, it can be close to impossible for consumers to make a well-informed decision, as pricing structures and marketing practises create confusion.



3.2. Improving data availability and quality

AFIR sets several provisions to make data available about prices, payment methods, availability of chargers, etc. This is aimed notably at improving consumers' lives in finding and using public chargers. By the end of next year, a common European access point should be set up to function as a data gateway facilitating the access to data.

In several instances, as our members' tests have shown, data availability and quality is lacking or insufficient.

eMSPs should be mandated to greater data sharing requirements and be integrated in a central database to allow for easier comparison. Subscription models or one-off purchases for charging cards provided by eMSPs, alongside the savings they promise when charging, need to be more transparent. A public database allowing for effective comparison between offers from mobility service providers should be available to consumers.

The current AFIR provisions on data availability from eMSPs are insufficient, as they do not allow for precontractual comparison of their offers



Mobility service providers shall make available to end users, prior to the start of an intended recharging session, all price information specific to that recharging session, through freely available, widely supported electronic means, clearly distinguishing all price components, including applicable eroaming costs and other fees or charges applied by the mobility service provider.

- Alternative Fuels Infrastructure Regulation (2023)

Overall, the AFIR review should assess policy options to ensure that all charging information (both static and dynamic) is easily accessible to users, beyond the current requirements of its article 20. The development of an EU-wide open data platforms should ensure harmonised rules and reporting on charging information and prices.



3.3. Strengthening AFIR requirements

When adopting AFIR, co-legislators introduced different requirements for fast and slow chargers. They also allowed for various payment means and pricing mechanisms.

Although clarifying important elements to protect consumers, these provisions have shown their limits and led to different interpretations by market players. BEUC therefore calls on the following changes in AFIR (article 5):

- The price components must be clearly indicated before the charge and after, on the bill;
- Billing in €/kWh should be harmonised at all public charging stations;
- Ad hoc prices must be clearly displayed at all charging stations and not available only via digital means (such as apps, or after scanning a QR code) as is the case for slow chargers;
- Ad hoc payment methods by debit/credit card should be extended to all public chargers. Social fairness and accessibility are important as the BEV market grows.
 Many consumers are not at ease with using digital tools to pay (QR Codes, long procedures on their smartphone, etc.).

Importantly, ad hoc prices should be truly ad hoc. Indeed, BEUC members have noted a trend from CPOs to offer slightly cheaper price in exchange of consumers' data (i.e. signing up to a newsletter), without formally subscribing to a service. Giving away data for the same level of service is not acceptable.

3.4. Tackling high prices

National and EU policy measures should also address high prices at some public charging stations, which BEUC members have identified across Europe. The AFIR review and the Member States' progress reports should be the opportunity to look at policy actions tackling this issue, for example:

- At national level, lowering VAT on electricity can be a positive signal to EV drivers;
- National authorities should look at how variation in gross electricity prices are actually reflected in prices at public charging stations;
- Support to local drivers who do not own a private parking spot, via preferrential tariffs;
- Dynamic tariffs and smart charging must be deployed much faster at public charging stations, along with energy storage capacity for charging stations;
- Fast track permitting and greater standardisation should reduce installation costs for CPOs.