To:
Mr **Frans Timmermans**, Executive Vice-President for the European Green Deal
Ms **Adina Valean,** Commissioner for Transport
Mr **Thierry Breton,** Commissioner for Internal Market
Ms **Kadri Simson,** Commissioner for Energy

Copy to:
*Mr **Kurt Vandenberghe**, European Green Deal Adviser to the Commission President Ursula von der Leyen,*
*Mr **Filip-Alexandru Negreanu-Arboreanu**. Deputy Head of Cabinet of Commissioner Adrina Valean,*
*Mr **Daniel Mes**, Member of Cabinet of Executive Vice-President Mr. Frans Timmermans,*
*Mr **Cristian-Silviu Buşoi**, European Parliament Chair of ITRE Committee,*
*Ms **Karima Delli**, European Parliament Chair of the TRAN Committee,*
*Mr **Pascal Canfin**, European Parliament Chair of the ENVI Committee,*
*Mr **Nuno Brito**, Portuguese Permanent Representative,*
*Mr **Iztok Jarc**, Slovenian Permanent Representative*

Brussels, February 11 2021

Making the AFID fit for the EU Green Deal - joint letter

Dear Vice-President Mr Timmermans, Commissioner Ms Valean, Commissioner Mr Breton, Commissioner Ms Simson,

To meet climate goals and achieve zero emissions mobility, electrification of road transport is the urgent priority. Electric car sales soared in 2020, reaching 10.5% of sales (battery electric vehicle and plug-in hybrid vehicles). With transport CO2 emissions being the largest contributor, with the least progress to date, we must rapidly develop re-charging and hydrogen re-fuelling infrastructure**.** An ambitious **revision of the Alternative Fuels Infrastructure Directive (AFID)** can and must deliver this.

The revision should be interlinked with the review of the CO2 standards - which will also take place from June, thereby increasing the number of ZEVs on the road in the 2020s. T&E, ACEA and BEUC estimate that delivering the necessary re-charging and hydrogen re-fuelling infrastructure to underpin a zero emission mobility system should be at the heart of the EU's industrial strategy as it will be fundamental to building a resilient automotive industry, and the e-mobility value chains of tomorrow. Rolling-out a recharging infrastructure network, that covers all

of Europe and is easy to use, is also a pre-condition for consumers to switch to zero-emission vehicles. This letter focuses on infrastructure for light-duty vehicles.

Currently we have a highly fragmented and insufficient European market for re-charging and hydrogen re-fuelling infrastructure. The lack of binding targets across member states, the technical discrepancies (e.g. payment solutions, protocols, connectors) and the divergent approaches on opening concessions have resulted in inadequate coverage in large parts of Europe. All these factors over the years have resulted in barriers to investment, undermining the connectivity of European consumers and goods and ultimately threatening the growth of a sector that is a key contributor to Europe's Green Deal and economic ambitions.

We, the undersigned, **call for the European Commission to urgently review the Alternative Fuels Infrastructure law and propose an ambitious regulation** rather than a directive, **and to set binding national targets for all vehicle segments**.

Changing this into a regulation would:

- Help **harmonize** the common market for zero emission road transport across Europe, from re-charging and re-fuelling standards, to payment methods, to tariff transparency to maintenance and more;
- Allow for **swift implementation to align with the fast-growing ZEV market** given that transposition into national law of a directive can take multiple years;
- Grant the framework to cover the areas where most re-charging will happen in the immediate future (i.e. charging in public parking facilities like supermarket parking lots).

We also ask the Commission to **set binding targets per member state -** separately for the passenger cars and heavy-duty vehicles - for the deployment of publicly accessible re-charging and re-fuelling points in 2024 and 2029, to facilitate the ramp-up of the registrations of electrically chargeable and hydrogen vehicles. In order to meet the objective of the European Green Deal, the following minimal targets should be set in stone: **one million charging points in 2024 and three million in 2029 for passenger cars and vans, as well as around 1,000 hydrogen stations by 2029. In the Annex of this letter, the signatories suggest a simple and fair allocation methodology for the target on the number of public charge points per member state.**[1] Those targets are essential to support industry to meet current benchmark levels for electrification in 2030 and help implement the Green Deal objectives.

Having binding targets for each country would create a **clear and harmonized pathway for deploying re-charging and hydrogen re-fuelling infrastructure**, independent of national agendas which could risk undermining the longer-term coherence in the deployment strategy. Most importantly, such targets would send a strong signal to consumers that they can have confidence in these technologies. They would also grant much needed certainty to not only the automotive industry, giving them the ability to sell ZEVs in Europe in the 2020s, but also to the

[1] A specific calculation methodology regarding charging stations and hydrogen stations for heavy-duty vehicles needs to be developed to fix the required number of stations and will be presented in an upcoming letter.

entire **ZEV-mobility value chain** from grid and pipeline operators, to re-charging and hydrogen re-fuelling infrastructure manufacturers and transport companies. Ultimately, supporting this proposal would also provide for the **creation of one million jobs**[2] across the continent, becoming a cornerstone of the EU industrial strategy to shift towards zero emission mobility.

Moreover, the revision should also set more granular and detailed complementary targets such as:

- A **minimum target** to ensure that the number **of publicly accessible chargers** increases in line with the number of EVs on the road (see annexes for details);
- **Initiating a mid-term review in 2024** in order to provide a sound reality check with the factual market situation which is backed with a broad dataset that captures the continuously changing demands of the future fleet and its regional or national customers, and be based on continuous monitoring of the AFID implementation on one side and changing consumer behaviour on the other;
- **Coverage of TEN-T networks** by 2025 to allow seamless travel across the EU, even in most remote regions: at least one ultra-fast (>150 kW) recharging site every 50 km on the TEN-T Core network and at least one ultra-fast charging site (>150 kW) every 100 km along the TEN-T Comprehensive. The coverage of the comprehensive network should guarantee that rural areas are adequately covered;
- **Deployment of fast and ultra-fast recharging in urban areas** to address the growing needs of EV drivers with no or little access to private charging, highly utilised electric vehicles (taxis, ride-hailing services, shared EVs, delivery vehicles). This should be ensured by **adequate parameters to be set** as well as a **density parameter** to ensure sufficient capacity of higher power charging points in heavily populated areas;
- Requirements for high-quality charging infrastructure across the EU that instils consumer confidence[3]: **seamless payment**, interoperability, real-time availability, **transparent and fair price structure** and high uptime requirements;
- Ensure **thorough monitoring and enforcement procedures** of the member states to ensure sufficient information is available to customers on the availability, status and capacity of the charging points[4]. In particular, EAFO's role and performance needs to be reassessed and improved, notably with the aim of setting up an EU central monitoring system which would be more robust than country reporting.

Next to a strong and ambitious AFID review, additional policy measures need to be implemented to support the transition towards low and zero emission mobility – e.g. a review of the EPBD focusing on the availability of charging infrastructure in old and new buildings, smart incentives to stimulate demand for low and zero emission mobility, a review of CO2 standards, fair carbon pricing and measures at the national level to facilitate infrastructure deployment. This includes:

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[2] https://www.platformelectromobility.eu/wp-content/uploads/2018/02/European-Platform-for-electromobility%E2%80%99s-position-on-Green-Deal_FINAL-2.pdf

[3] For details on a consumer-friendly charging infrastructure, see BEUC recommendations: https://www.beuc.eu/publications/beuc-x-2019-032_making_electric_cars_convenient.pdf

[4] For details see ACEA position on AFID review: https://www.acea.be/uploads/publications/ACEA_Position_Paper-Review_of_Alternative_Fuels_Infrastructure_Directive.pdf

building rules, granting the “right to plug” or on-demand roll out, simplifying permitting procedures, obligation of maintenance, etc.

It is also essential to stress that the Commission should take a close look at the **national recovery plans now submitted and** make the assessment of, and investment in, recharging and hydrogen refuelling mandatory. This would push member states to heavily invest in infrastructure and boost the number of charging points available to customers.

On behalf of the signatories, we truly hope the Commission can lead in the creation of a zero-emissions mobility system through delivering an ambitious infrastructure proposal, thereby honouring the commitments under the EU Green Deal strategy.

We remain at your disposal for any further assistance.

Yours sincerely,

ACEA

BEUC

Transport & Environment

Annex: Required number of charging points for passenger cars and vans:

The number of public charging points per Member State (PCP_i) is defined as follows for both 2024 and 2029:

$$PCP_i = \alpha_i \times GDO$$

where:
GDO is the European Green Deal objective for public charging infrastructure deployment brought forward by a year: one million in 2024 and three million in 2029.

α_i is the allocation key of Member State i, defined as:

$$\alpha_i = \frac{\frac{1-APC_i}{APCaverage} \times \frac{S_i}{Stotal} \times \frac{EVS_i}{EVSaverage} \times \frac{D_i}{Daverage}}{\sum_{i=1}^{27} \frac{1-APC_i}{APCaverage} \times \frac{S_i}{Stotal} \times \frac{EVS_i}{EVSaverage} \times \frac{D_i}{Daverage}}$$

with:

APC_i is the access to private charging in country *i,*
APC*average* is the average access to private charging in the EU*,*
S_i is the total number of passenger cars sold in country *i,*
S*total* is the total number of passenger cars sold in the EU*,*
EVS_i is the share of sales for electric cars in 2020 in country *i,*
EVS*average* is the average share of sales for electric cars in 2020 in the EU,
D_i is the average annual distance driven by passenger cars in country *i,*
D*average* is the average annual distance driven by passenger cars in the EU,

With $25\%*EVS_{average} \leq EVS_i \leq 200\%*EVS_{average}$

The application of the methodology will result in the following share and amount for the number of public charge points per Member State in 2024 and 2029.
Reminder: the 2029 target is indicative as it should be updated in the mid-2020s based on the cumulative electric cars sales from 2020 to 2025.

Member States	2024	2029
Austria	23,948	74,193
Belgium	37,566	114,254
Bulgaria	803	7,174
Croatia	588	5,252
Cyprus	141	1,219
Czech Rep.	3,531	32,885
Denmark	30,834	67,408
Estonia	580	5,276
Finland	19,600	38,240
France	206,587	552,464
Germany	398,733	1,030,165
Greece	2,281	20,853
Hungary	3,397	17,927
Ireland	9,242	30,699
Italy	54,662	350,782
Latvia	621	4,493
Lithuania	965	8,699
Luxembourg	2,652	7,474
Malta	97	866
Netherlands	76,852	149,963
Poland	4,035	36,894
Portugal	22,762	53,695
Romania	1,102	10,172
Slovakia	888	8,305
Slovenia	888	6,880
Spain	37,966	214,341
Sweden	58,681	149,424
Total	**1,000,000**	**3,000,000**