



M. Jernej Vrtovec
Minister of Infrastructure
Ministry of Infrastructure
Langusova ulica, 4
1535 Ljubljana
Slovenia

Brussels, 30 November 2021

Subject: Alternative Fuels Infrastructure Regulation – ACEA concerns over the level of ambition

Dear Minister Vrtovec,

Ahead of the important discussion on the proposal for the **Alternative Fuels Infrastructure Regulation (AFIR) at the Transport Council on 9 December**, we would like to express our serious concerns about the lack of ambition that has been displayed so far in the Council.

The European auto industry is united in its view that the **AFIR proposal presented by the European Commission is not sufficiently ambitious to support the EU's emission-reduction objectives**, nor the rapid transition to zero emission mobility. It is imperative that member states strengthen, rather than weaken the proposed binding infrastructure targets, and accelerate the timeline.

The **AFIR proposal is a central pillar of the 'Fit for 55' package**. It must be fully aligned with other relevant legislative initiatives, particularly the review of the CO2 Regulation for cars and vans and the upcoming revision of the regulation on CO2 standards for heavy-duty vehicles. It is patently obvious that higher CO2 targets will

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only be met if the EU sets equally ambitious targets for the necessary charging and hydrogen refuelling infrastructure.

At present, the EU's alternative fuel infrastructure network is inadequate. Across the EU, there is a **massively uneven distribution of charging points** for electrically-chargeable vehicles, with over 70% of all charging points located in just three EU member states. For heavy-duty vehicles, which require different technical specifications, almost no charging or hydrogen refuelling infrastructure is available today.

The roll-out of a public charging and hydrogen refuelling network that covers all of Europe and that is easy to access will be a key parameter in determining the future market share of low- and zero-emission vehicles. Moreover, it is important that all stakeholders recognise the scale and urgency of this challenge. With fewer than 300,000 electric charging points available across the EU today, **the gap to be filled over the coming decade is huge.**

With a view to making some **concrete recommendations to address these concerns**, we are sending you the position paper of the European Automobile Manufacturers' Association (ACEA). In particular, this paper recommends to:

- Significantly increase the power output levels for public charging, both for light-duty and heavy-duty vehicles;
- Increase the number of required charging points along TEN-T core and comprehensive networks;
- Speed up the timing for the deployment of alternative fuels infrastructure;
- Implement measures to stimulate fast charging for light-duty and megawatt charging for heavy-duty vehicles;
- Streamline requirements for TEN-T networks, including faster implementation of the deployment;
- Standardise charging points and roaming to achieve seamless charging for customers;
- Accelerate the roll-out of hydrogen refuelling stations.

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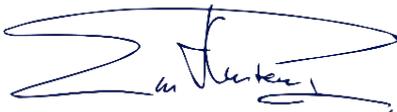
Europe's automobile manufacturers are fully committed to climate-neutral mobility by 2050 and have all made significant investments in low- and zero- emission technologies. **However, it is only with the necessary enabling conditions, particularly the requisite charging and hydrogen refuelling infrastructure, that vehicle manufacturers will be able to meet future CO2 targets.**

Our industry's considerable efforts must be met with the same level of ambition by EU member states. **It is only by working together that we will create the right enabling framework** that will drive consumers and transport operators towards cleaner mobility options, and thus achieve our common goal of reaching climate neutrality in Europe.

We encourage all member states to strengthen the level of ambition of the AFIR proposal and to oppose any efforts to weaken or delay its provisions.

We thank you for your consideration and we remain at your full disposal for further information.

Yours sincerely,



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