

To:

Adina Vălean, Commissioner for Transport
Andreas Carlson, Minister of Infrastructure and Housing of Sweden
Ismail Ertug, MEP, Rapporteur AFIR

Copy to:

Frans Timmermans, Executive Vice-President, European Green Deal
Karima Delli, Transport Committee Chair
Hendrik Hololei, Director-General for Mobility and Transport
AFIR-shadow rapporteurs
EU Transport Ministers

Brussels, 21 March 2023

Dear Transport Ministers, dear Commissioner Vălean, dear MEP Ertug,

We, the undersigned signatories, strongly support the Alternative Fuel Infrastructure Regulation (AFIR) as a framework to significantly increase charging infrastructure in line with a rapid and accelerating uptake of EVs. We call for a more ambitious approach in the deployment of publicly accessible charging infrastructure for both light-duty and heavy-duty vehicles. This will help the Alternative Fuel Infrastructure Regulation (AFIR) to fulfill its promise of facilitating the transition to zero-emission vehicles *by ensuring that sufficient publicly available recharging and refuelling infrastructure is in place for light- and heavy duty road transport vehicles.*¹

While the long-term goals for charging infrastructure for light-duty vehicles proposed by the European Commission are commendable, unfortunately they may not be sufficient. The AFIR does not account for the fact that more public charging power is needed in the short to medium term to frontload the deployment of charging infrastructure and thus support accelerated uptake of battery electric vehicles in this segment. This is why a full coverage of the entire TEN-T network with sufficient charging pools, not just the core network, by 2025 is crucial to ensure that European citizens as well as businesses can travel and operate anywhere in the EU with an electric vehicle.

Both the Commission's proposal and the Council's approach seem to underestimate the speed of the adoption of zero-emission trucks, buses, and coaches². OEMs have pledged, on average, to sell 7% zero-emission vehicles by 2025, rising to 50% in 2030.³ More than 130 companies, including many of the largest fleet operators in Europe, have already committed to a full decarbonisation of their fleets through the EV100 and EV100+ initiatives. To support this growth, the targets in Article 3 and 4 of AFIR should be at least in line with those proposed by the European Parliament.

Ambitious goals are crucial to develop the necessary infrastructure in time. Permitting and other administrative processes can be time-consuming, and some charging infrastructure projects may require grid expansion or reinforcement. Adequate lead time is thus critical to avoid potential delays in the future.

Therefore, we call on all negotiating parties to support the targets for light-duty vehicles as proposed by the European Parliament's positions and for heavy-duty vehicles in line with the most ambitious scenario in the European Commission's impact assessment.

¹ European Commission (2021). Proposal for an Alternative Fuel Infrastructure Regulation. Retrieved from: https://eur-lex.europa.eu/resource.html?uri=cellar:dbb134db-e575-11eb-a1a5-01aa75ed71a1.0001.02/DOC_1&format=PDF

² According to the European Automobile Manufacturers' Association (ACEA), electric vehicles accounted for 12.1 percent of new car sales in the EU in 2022, compared to 9.1 percent in 2021 and 1.9 percent in 2019.

³ Analysis based on latest public manufacturer announcements

Yours sincerely,

