

## INCEPTION IMPACT ASSESSMENT ON THE REVISION OF THE DIRECTIVE 2014/94/EU ON THE DEPLOYMENT OF ALTERNATIVE FUEL INFRASTRUCTURE

### UFE'S REPLY

**UFE welcomes the revision of the Directive 2014/94/EU** and supports the Inception Impact Assessment (IIA) proposed by the EC to adapt the Directive to the EU Green Deal. The AFID revision is needed to address a fragmented European charging infrastructure market, to support investment and remove market barriers, with the aim to allow a smooth uptake of e-mobility and a seamless driver experience for EU citizens. The current AFID does not promote sustainable transport and must be modified to address the surge of the EV market by 2030. Nevertheless, **UFE would also like to provide further elements that should be included in the IIA.**

**The scope of AFID should be extended and set minimum requirements for all charging infrastructure accessible to the public.** UFE considers that some rapid technological developments have not been well enough integrated in the AFID. In particular, the scope extension should recognise smart charging technologies and the differentiation of various charging power levels in line with the progress made on high-power charging to accommodate the needs of the HDV segment (e.g. trucks, long haul, coaches, buses). The underlying technologies facilitating communication between parties and systems should be interoperable.

The EC **should assess the disparities in the deployment of alternative fuel infrastructures between MS under Problem 1.** Such an assessment is required to capture the actual need for charging infrastructure across the EU and push for an EU-wide coherent approach considering the diversity of needs and uses of charging infrastructures between the Member States' territories.

**"Interoperability" under Problem 3 should be addressed through a consumer approach,** by guaranteeing payment solutions, ensuring open networks based on open standards, as well as making available information on the infrastructure location and access to ease the access and use of charging infrastructures throughout the EU.

Unlike the IIA, **UFE is confident that the electricity system will be able to integrate the important EV deployment by 2030. However, the deployment of smart charging in the public infrastructure could be developed in the residential district and tertiary areas** especially where a lack of private charging infrastructure can be observed in condominiums.

**UFE believes that the IA should assess:**

- **The revision of the "alternative fuels" definition to ensure its consistency with the targets defined in the CO2 regulations.** A new specific definition for cars and vans (LDV) should be introduced with a CO2 emission threshold to support only zero-emission fuels. The current "alternative fuels" definition should keep applying to HDVs while ensuring their compatibility with the 2030 and 2050 targets through the development of electric and decarbonised hydrogen refuelled HDVs.
- **The need of national binding targets for the deployment of recharging points** through a new metric reflecting the diversity of needs and uses in the Member States and their current level of infrastructure deployment. Such targets must be adapted to the vehicle type considering

the stage of the infrastructure deployment for LDVs is more advanced than for HDVs, and that both use different types of charging points.

- **The importance of the role of local and regional authorities in the deployment of recharging points** depending on the territory needs through a global approach, at the EU and national levels. In France, for instance, master plans will be implemented with local authorities to ensure that the infrastructures deployed comply with the territory needs and specificities.
- **Regarding the TEN-T Core Network, the target of one charging point/60 km should be mandatory** and the need for ad-hoc subsidies assess to support the expected costs of infrastructures.
- **The incentivisation of the electrification of maritime transport should be examined in the new AFID** as the increase of the electricity usages are foreseen in initiatives (e.g. EUFuel Maritime).