

WindEurope feedback on the inception impact assessment on the Alternative Fuels Infrastructure Directive (AFID)

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Transport is the only sector in Europe in which emissions have increased in the last decades. Today, transport emissions are nearly 20% higher than in 1990¹, representing more than a quarter of Europe's greenhouse gas emissions. And European transport needs are expected to grow significantly by 2050, hence an urgency to tackle this issue notably by expanding the use of alternative fuels and their dedicated infrastructure.

Revising the Alternative Fuels Infrastructure Directive (AFID) is therefore of utmost importance to support the achievement of the Paris Agreement objectives, the European Green Deal and to reach the EU 2030 energy and climate objectives.

WindEurope, representing the entire European wind power value chain with more than 400 members, welcomes the European Commission roadmap & consultation on the inception impact assessment on the Alternative Fuels Infrastructure Directive. The wind power sector has a key role to play in the energy transition supplying half of Europe's electricity by 2050.

Consumers will only feel confident to opt for alternative fuels vehicles if they have access to a sufficient refuelling infrastructure network, and if they have certainty that they can refuel where and when required. On the other hand, investments in alternative fuels infrastructure will only be made if this demand from consumers materialises. Therefore, governments have a key role to play in incentivising action by both consumers and infrastructure providers until a competitive market materialises.

The revision of the Alternative Fuels Infrastructure Directive is an opportunity for Member States to boost their alternative fuels infrastructure targets and support the restart of the EU's economy after the COVID-19 crisis, as well as to ensure Europe reaches carbon neutrality by 2050.

To this end, WindEurope calls for the inception impact assessment of the European Commission on the AFID to:

- **Be aligned with the European Green Deal and the EU Recovery Plan;**
- **Foster the development of the necessary infrastructure for the uptake of zero-emission transport; and**
- **Factor in consumers acceptance and incentives to achieve zero-emission mobility.**

1. The "alternative fuel" definition needs to be aligned with the European Green Deal and the EU Recovery Plan on the decarbonisation of transport

As mentioned above, the transport sector is responsible for almost 30% of Europe's carbon emissions, more than any other sector. Direct electrification is the most cost-efficient and fast way to decarbonise the transport sector in general, especially light-duty transport, while indirect electrification could decarbonise heavy-duty transport (e.g. via renewable hydrogen i.e. electrolysed hydrogen powered by 100% zero-carbon renewable electricity), especially shipping and aviation. Yet, the AFID does not support full decarbonisation of the transport sector as the AFID list of technologies includes some

¹ European Commission, DG Climate Action: https://ec.europa.eu/clima/policies/transport_en

fossil fuels, hence going against a Paris-compatible decarbonisation scenario and the EU 2050 carbon neutrality objective.

Moreover, as the text of the AFID was agreed on in 2014, it needs to be aligned with the new goals of the European Commission in order to accelerate the deployment of alternative fuels infrastructure, to contribute to reducing CO₂ emissions from road transport and to achieve a faster transition towards zero-emission mobility.

Consequently, the “alternative fuel” definition of the Directive needs an update in order to only include those zero-emission alternatives to be in line with EU’s decarbonisation objectives.

Ensuring consistency between the AFID and the EU long-term decarbonisation objectives is crucial in order to achieve carbon neutrality by 2050.

The current AFID is not ambitious enough. The current AFID requires each Member State to notify the European Commission on its strategy for deployment of alternative fuels infrastructure in National Policy Frameworks (NPF). As part of the mobility package, the European Commission revised these NPFs and adopted a staff working document² (updated in 2019). In this document, the European Commission concluded that the contribution to CO₂ emission reductions of the current AFID are scarce due to a low ambition level of the national alternative fuels infrastructure targets of the NPFs. Therefore, contributions of the AFID to the 2030 energy and climate policy objectives have been limited.

In addition, the **European Green Deal has set ambitious objectives for the transport sector**: a travel connectivity with a dense, widespread and reliable alternative fuels infrastructure network for different modes of transport (e.g. rail, buses, taxis, and car sharing). The European Commission also announced a goal of one million public recharging and refuelling stations by 2025 for the 13 million zero- and low-emission vehicles expected on European roads.

On top of this, easing planning applications, including facilitating permitting and approval procedures for renewable fuels infrastructure are key. The AFID should follow the lead of the Renewable Energy Directive (RED II) that allows for an expedited planning approach for renewable power production to allow a similar approach for renewable alternative fuels infrastructure.

WindEurope is therefore calling European policy makers to take action to put the AFID on track with the European Commission objectives of decarbonisation of the transport sector, for a swift revision and, then, implementation of the AFID. It is also crucial for the revised AFID to focus on zero-emission transport.

2. The revised AFID needs to foster the development of the necessary infrastructure for the uptake of zero-emission transport

Zero-emission fuel vehicle fleet, especially electric vehicles (EVs), are rapidly increasing. Indeed, if costs of EVs continue to decrease and are on a par with internal combustion engine vehicles by 2024 for light vehicles and by 2027 for heavy vehicles, then half of all new sale vehicles will be EVs shortly after 2025 for light vehicles and shortly after 2030 for heavy vehicles.³ There is therefore a need to increase the number of electric charging points in all Member States and for all modes of transport.

In their NPFs, Member States should describe the deployment of the necessary infrastructure to be put in place. Yet, the EC concludes in its staff working document and inception impact assessment that

² [Staff Working Document on the assessment of the Member States National Policy Frameworks for the development of the market as regards alternative fuels in the transport sector and the deployment of the relevant infrastructure](#)

³ [WindEurope Breaking new Grounds](#)

these NPFs are not coherent EU-wide. National ambitions are diverging on the deployment of charging points accessible to the public and the number of charging points envisaged do “not meet the expected uptake of alternatively fuelled vehicles and vessels.” In order **to boost the zero-emission vehicle market, the availability of charging infrastructure is crucial.**

How to ensure that the right number of charging points is met in all Member States to reflect the expected development of EVs sales is a key question. Member States have already provided a long-term vision of decarbonisation of the transport sector including for the increase of electrification in the transport sector in their 2030 National Energy & Climate Plans (NECPs). For instance, as well as describing support systems in place for buying zero-emission cars, Finland’s NECP is foreseeing at least 25,000 public recharging points by 2030 for a minimum of 250,000 EVs.

WindEurope believes that strengthening the roll-out of electric charging infrastructures and alignment of the future NPFs with the 2030 NECPs is needed. **Minimum and coordinated national binding targets based on coverage and demand criteria, with a concrete & realistic implementation plan for electric charging stations in compliance with the expected average uptake of EVs in each Member States, should be reconsidered** in order to give market participants the right investment signals and to achieve a comprehensive connectivity network. This should be accompanied by continued customer incentives to buy EVs to ensure return on infrastructure investments.

The EC Inception Impact Assessment identifies another issue: the lack of a comprehensive network connectivity across borders and across modes of transport. MS target different fuels (e.g. electricity, hydrogen and biofuels) and different modes of transport (e.g. cars, buses and rail). This leads to an inconsistent EU-wide network and a difference in treatment between various modes of transport.

- For instance, the Trans-European Transport Network (TEN-T) lacks overall electric charging infrastructure and stations for vehicles, but even more so for heavy-duty vehicles. As the European Commission plans to provide safe and secure parking areas for trucks (with access to electricity), WindEurope supports the roll-out of these safe parking areas with access to electric charging infrastructure for vehicles along the TEN-T corridors, especially for heavy-duty transport. In order to ensure 100% renewable electricity at these stations and as electricity demand at these stops will be significant, we suggest, as part of the EU Recovery Plan, the development of a methodology to ensure that only renewable power is used, through direct links (e.g. with onshore windfarms on site).
- With regards to heavy road transport, it may not be feasible or cost-efficient to electrify directly some segments of this sector with current battery technology. This also goes for parts of shipping and most of aviation. For these segments, renewable hydrogen fuelling infrastructure should be deployed, in a way that ensures consistency across Member States in order to guarantee that cross-border travel is possible. As per above, this renewable hydrogen must be powered by 100% renewable electricity, and its definition should be consistent with the Renewable Electricity Directive II (RED II).
- Member States have, so far, rarely used onshore power supply (OPS) for vessels. Yet, it is an efficient way to decarbonise shipping. WindEurope believes that the EC needs to strengthen the deployment of OPS that should be able to charge batteries of relevant ships. Also, deep-sea routes are particularly challenging to complete with zero-emission fuels, being renewable hydrogen a promising solution for zero-carbon shipping. It is therefore key to assess supply and infrastructure needs and identify routes and port that could support demand throughout the development of a refueling renewable hydrogen infrastructure. It would help maximising offshore and onshore power supply to produce renewable hydrogen.

WindEurope calls for a coherent implementation of the AFID directive and national objectives across all modes of transport and for all zero-emission alternative fuels.

In synergy with the energy sector, electromobility can provide flexibility for the electricity grids. Smart charging infrastructure and vehicle-to-grid can provide demand side flexibility and help improving grid management.

Yet, according to the Inception Impact Assessment of the European Commission, the existing electricity network is not yet equipped to ensure proper integration of an increasing EV fleet. Optimising the use of the existing electricity network should therefore be a priority together with further grid development as a no-regret option and investments into smart grids.

Finally, in order to maximise flexibility benefits and to make smart charging a reality, **WindEurope calls for the deployment of smart charging infrastructure** in a cost-efficient way for instance by equipping EV charging infrastructure with smart technologies.

3. Consumers acceptance and incentives are crucial to achieve zero-emission mobility

Consumer acceptance is key for the uptake of electric vehicles and the development of zero-emission fuels in Europe. Yet, according to the Inception Impact Assessment of the European Commission, users and consumers of alternative fuels road vehicles “often face problematic conditions for using that infrastructure”. This is due to two phenomena:

- a) There is no universal “instruction manual” for each type of alternative fuels infrastructure (charging stations are not harmonised and are all working differently); and
- b) There is a lack of information and transparency.

Electric mobility is a key example. There is a lack of information on the availability, and accessibility of charging stations. For consumers to be willing to use alternative fuels infrastructures, adequate and transparent information is needed (including on the location of charging infrastructure, accessibility and visibility of the fuel price).

WindEurope calls for electric charging in Europe to be user-friendly, smart and seamless for consumers.

Finally, standardisation of refuelling technology/infrastructure to ensure a single internal market is also important to fast track alternative fuels growth in the EU. **Standardisation helps to achieve economies of scale in production and ultimately contribute to reduce costs for the final consumer.** In particular, the refuelling connections for battery electric and hydrogen fuel cell electric vehicles should be standardised as this will allow all vehicles to be refuelled at all stations. With regards to interoperable networks, all public EV charging infrastructure should have open access to all customers.