



*Employers entrusted to deliver
Sustainability Growth Innovation*

Position Paper

Revision of the Alternative Fuels Infrastructure Regulation (AFIR)

28 February 2022

Summary:

- SGI Europe welcomes the principles of the proposed revision of the Alternative Fuels Infrastructure Regulation (AFIR). Especially for the mobility sector, **we welcome the European Commission's requests to Member States to consider charging stations for public transport operators when drafting the national plans (Art. 13) and that the definition of alternative fuels remains almost unchanged (Art. 2(3));**
- **Smart, intelligent charging is essential for a successful roll-out of e-mobility and is actively supported by SGI Europe.** As much as we agree with the Commission on Art. 5 paragraphs 7 and 8 to ensure that all public accessible recharging points are digitally connected and capable of smart charging, **we strongly underline to add more reasonable transitional periods for Member States to ensure a fair roll-out;**
- **SGI Europe urges the co-legislators to clarify the request to display the ad-hoc price, including all its components at charging stations.** We recommend avoiding the physically installed display of information on the recharging infrastructure but having this information displayed on an external device such as in the car or mobile phone;
- SGI Europe calls for **more clarity under the new definition of "public accessibility". SGI Europe generally welcomes the introduction of an EU-wide uniform definition. However, we are critical of the current proposal.** With this definition, semi-public charging/refuelling facilities (e.g. in supermarket parking lots or underground garages, housing sector) would fall under this definition, creating high and burdensome administrative costs, especially in the housing sector.

With the "Fit for 55" climate package, the European Commission has also proposed an amendment to the "The deployment of the infrastructure for alternative fuels regulation" (AFIR). In the future, the directive is to become a Europe-wide regulation, which SGI Europe in principle welcomes. SGI Europe, as a cross-sectoral organisation representing providers of services of general interest, including sectors such as energy, housing, water, waste, education and also public transport, welcomes the European Commission's requests to Member States to consider charging stations for public transport operators when drafting the national plans (Art. 13) and that the definition of alternative fuels remains almost unchanged (Art. 2(3)). Also, the highlighting of the critical distribution system operators (DSOs) is duly noted.

Fairly and timely implementation of smart and intelligent charging stations:

SGI Europe welcomes the whole regulation proposal as the inclusion of smart, intelligent charging is important for a successful roll-out of e-mobility. However, many recharging points are not yet equipped with these functionalities. Article 5 requires operators of recharging points to ensure that all publicly accessible recharging points they operate are digitally-connected (par. 7) and capable of smart charging (par. 8) without transition periods. SGI Europe argues in favour of having these obligations for new recharging points while adding reasonable transitional periods, which are necessary for the providers of the charging points.

In paragraph 5, the Commission envisages that operators have to display the ad hoc price clearly, including all its components. SGI Europe supports this obligation while urging **co-legislators for clarity that these displays do not have to be physically installed on the recharging infrastructure** but alternatively have this information displayed on an external device such as in the car or mobile phones.

More clarity under the new definition of Public Accessibility:

However, SGI Europe wants to bring to the attention of the EU co-legislators the small change under the new definition of "**public accessibility**," which could have far-reaching consequences. In the future, every alternative fuel infrastructure accessible to the general public is to be regarded as a public charging or refuelling infrastructure, regardless of whether it was built on private land or public land. **SGI Europe generally welcomes the introduction of an EU-wide uniform definition. However, we are critical of the current proposal.** With this definition, semi-public charging/refuelling facilities (e.g. on supermarket parking lots or in underground garages, housing sector) could fall under this definition, creating high and burdensome administrative costs, especially in the housing sector where these problems remain in terms of connecting the building's charging stations to the power grid.