

POSITION PAPER

CLECAT position on the Proposal for a Regulation on the deployment of Alternative Fuels Infrastructure

Introduction

CLECAT is the European Association for Forwarding, Transport, Logistics and Customs Services. CLECAT members, operating at EU and global level, utilise all modes of transport, including road, rail, air, maritime and inland waterways, as well as intermodal solutions.

CLECAT welcomes the 'Fit for 55' package tabled by the European Commission in July 2021, aimed at reaching the EU's 2030 goal of cutting emissions by 55%, and specifically the Commission's ambition to ramp up the production of sustainable alternative transport fuels, which is essential for reducing the EU transport sector's dependency on the fossil-based energy, as well as for mitigating the environmental and societal impacts of transport.

Key messages

- CLECAT welcomes **the change of the legislative instrument, from a Directive into a Regulation**. This means that the Regulation will have binding legal force throughout every Member State from the moment it enters into force. It can be swiftly implemented in the coming years with the targets and requirements applying as early as 2025 in line with the electric and hydrogen vehicle market growth.
- The introduction of **binding targets** for 2025 and 2030 for the deployment of zero-emission truck infrastructure along the TEN-T core and comprehensive network, as well as at urban nodes and in Safe and Secure Truck Parking Areas, is much needed.
- Question remains whether the proposal satisfies the **required power level of the truck chargers**, which is currently too low to recharge during the legal resting breaks of the drivers.
- The proposal fails to include **national fleet-based targets for heavy-duty vehicles chargers**. This is problematic as there are currently large differences between Member States plans. Sufficient infrastructure must be rolled out at pace with the market developments for zero-emission trucks and with the expected demand from companies to decarbonise their fleets. It will be important to amend the proposal to include such national fleet-based targets and increase the power output required by the proposed distance-based targets.

- The Regulation should better recognise the role of **bridging technologies (LNG, biofuels) as a solution to decarbonise the sector** before the full uptake of electric heavy-duty vehicles. While CLECAT considers that transitional fossil fuels are not a long-term solution, they will be needed in the short-term and medium term to rapidly reduce emissions from the road transport sector or to ensure a back-up solution in case the targets are not met
- The proposal should be accompanied with **proper financial support, through EU and national funding instruments** to ensure that Member States meet their targets for the deployment of alternative fuels infrastructure and enable the energy transition in transport.

Background

The current [Directive](#) for the deployment of alternative fuels infrastructure helped develop an EU framework for the uptake of alternative fuels, notably ensuring that consumers/users receive relevant, consistent and clear information on the compatibility of their vehicle engine/model with the available alternative fuels/recharging options. However, the deployment of this infrastructure is currently uneven and insufficient to further decarbonise the transport sector. One of the reasons is that the requirements for the roll-out of the infrastructure are not sufficiently detailed.

In its [position paper](#) from May 2021, CLECAT noted that targets for the alternative fuels infrastructure development in different freight transport modes should be made mandatory for every Member State since the infrastructure that freight forwarders need a cross-border coverage. The switch to electricity/alternative fuels will not be as successful if large differences remain in the infrastructure between the different Member States with respect to charging/refuelling stations, which will prevent companies from using alternatively fuelled vehicles in international transport.

CLECAT therefore welcomes the [Commission proposal](#) for a Regulation on the deployment of alternative fuels infrastructure (the so-called AFIR) as a good step forward as it gives clear targets and requirements in order to develop the much-needed infrastructure. Nevertheless, a more ambitious proposal would have been desirable with regards to the requirements for the charging infrastructure for heavy-duty vehicles or the modes of transport and fuels covered.

Analysis of the proposal

- The choice of a **Regulation** as the legislative instrument from a Directive is highly appreciated, as it would provide an EU-wide direct application of mandatory targets for the deployment of alternative fuels infrastructure. This would further support harmonisation amongst Member States and ensure a decent cross-border infrastructure coverage.
- **Article 3: Targets for electric recharging infrastructure for light-duty vehicles**
 - The Commission proposes to include national fleet-based targets for recharging infrastructure dedicated to light-duty vehicles. This provision should be extended to heavy-duty vehicles: it would ensure that sufficient infrastructure is rolled out at pace with the market developments for zero-emission trucks and with the expected demand from companies to decarbonise their fleets.

- **Article 4: Targets for electric recharging infrastructure for heavy-duty vehicles**

- CLECAT welcomes the introduction of binding targets for the deployment of electric recharging infrastructure dedicated to heavy-duty vehicles along the TEN-T core and comprehensive network, urban nodes and in safe and secure truck parking areas, as many of the existing electric charging/alternative fuelling points for cars and vans in the EU are not suitable for heavy-duty vehicles in terms of size and power capacity.
- However, the required power level of HDV chargers (individual power output of at least 350kW, 100kW in SSTPA and 150kW in urban nodes) is currently too low to satisfy the need to recharge during the legal resting breaks of the drivers. Therefore, the Article 4 should be amended accordingly:

“Member States shall ensure a minimum coverage of publicly accessible recharging points dedicated to heavy-duty vehicles in their territory. To that end, Member States shall ensure that:

- (a) *along the TEN-T core network, publicly accessible recharging pools dedicated to heavy-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of ~~60~~ 50 km in-between them:*
 - (i) *by 31 December 2025, each recharging pool shall offer a power output of at least ~~1400~~ 2000 kW and include at least one recharging station with an individual power output of at least ~~350~~ 700 kW;*
 - (ii) *by 31 December 2030, each recharging pool shall offer a power output of at least ~~3500~~ 7000 kW and include at least two recharging stations with an individual power output of at least ~~350~~ 700 kW;*
- (b) *along the TEN-T comprehensive network, publicly accessible recharging pools dedicated to heavy-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of 100 km in-between them:*
 - (i) *by 31 December 2030, each recharging pool shall offer a power output of at least ~~1400~~ 5000 kW and include at least ~~one~~ six recharging stations with an individual power output of at least ~~350~~ 700 kW;*
 - (ii) *by 1 December 2035, each recharging pool shall offer a power output of at least ~~3500~~ 10 000 kW and include at least ~~two~~ ten recharging stations with an individual power output of at least ~~350~~ 700 kW;*
- (c) *by 31 December 2030, in each safe and secure parking area at least ~~one~~ ten recharging stations dedicated to heavy-duty vehicles with a power output of at least 100 kW is installed;*
- (d) *(...)*
- (e) *by 31 December 2030, in each urban node publicly accessible recharging points dedicated to heavy-duty vehicles providing an aggregated power output of at least ~~1200~~ 3500 kW are deployed, provided by recharging stations with an individual power output of at least ~~150~~ 350 kW.”*

- **Article 6: Hydrogen refuelling infrastructure for road vehicles**
 - The targets and requirements to develop a network of hydrogen refuelling stations on the TEN-T core and comprehensive network and in urban nodes is welcomed, as it would allow the uptake of the hydrogen-fuelled heavy-duty vehicles which can be relevant for long-haul journeys.
 - The production of hydrogen at industrial scale is currently scarce and requires less sustainable sources of energy, such as fossil fuels (so-called grey or blue hydrogen). Green hydrogen, produced with electricity from renewable sources may be a better solution but not commercially viable at the moment. Therefore, a provision can be added to include a sub-target for hydrogen refuelling stations to be supplied with a certain share of green hydrogen in the long term.

- **Article 8: LNG infrastructure for road transport vehicles**
 - CLECAT believes that fossil fuels, such as CNG, LNG and LPG, can only be regarded as transition fuel. Whereas these fuels will remain necessary for long-haul transport in the near future, they are not a long-term solution.
 - Nevertheless, the provisions related to the LNG refuelling points for road transport vehicles are too vague: they do not give enough incentives to Member States to encourage the development of LNG refuelling infrastructure and may further delay the decarbonisation of the road transport sector.
 - The Regulation should therefore promote the role of bridging technologies (transitional fossil fuels, biofuels) as a solution to decarbonise the road transport sector before the full uptake of electric HDVs.

- **Article 11: Targets for supply of LNG in maritime ports**
 - The proposal encourages the development of LNG refuelling points at TEN-T core maritime ports. The provision is appreciated, as it would give an incentive to switch from ships fuelled with conventional fuels by LNG-powered ships, and reduce emissions, in line with the ambition of the FuelEU Maritime initiative.

- **Article 12: Targets for supply of electricity to stationary aircraft**
 - The provision which ensures that stationary aircrafts are supplied with electricity are welcomed, as it would reduce emissions from aviation, along with the ReFuelEU Aviation initiative which aims to introduce an increasing share of sustainable aviation fuels into jet fuel.

- **Article 13: National policy frameworks**
 - This article addresses the remaining alternative fuels infrastructure and modes of transport that are not covered by the EU-wide targets. The idea of setting up national policy frameworks to drive the deployment of the infrastructure and the development of the market is welcomed, especially on the development of recharging stations for HDVs at private locations that are not accessible to the public, such as depots and logistics centres.
 - However, the lack of proper enforcement (with no penalty mechanism for example) would put a risk to a proper harmonised deployment of alternative fuels infrastructure throughout the EU.

- **Additional elements**

- The AFIR should be accompanied with proper incentives, for example through the Recovery and Resilience Facility according to the Recharge and Refuel flagship, to achieve those infrastructure targets in the Member States. In order to enable the energy transition in transport, new technologies must come with long-term investment certainty for end users. To generate successful market shift, regulatory incentive schemes should therefore focus on reliable long-term frameworks, meaning at least 10 years. It is therefore important that EU and national funding instruments prioritise support towards projects developing alternative fuels infrastructure in order to meet the ambitious targets of the proposal.
- Electricity is included in the scope of the Directive, but only static charging is defined. **Dynamic charging/electric road systems (ERS)** should also be included in the scope of the Directive, as this is crucial for electrifying long-haul trucks as well as lighter vehicles.
- The Commission proposal does not include any EU-wide mandatory targets for **rail infrastructure**. This can be regarded as a missed opportunity as in some cases the electrification of a railway line may not be economically viable, and therefore other zero- and low-carbon solutions, such as hydrogen, must be encouraged and pursued.
- The Commission should also ensure synergies with the forthcoming revision of the TEN-E Regulation to develop a superfast-charging infrastructure, reinforce the electricity grid, take into account the integration of locally produced renewable energy and allow vehicle-to-grid. With the expected uptake of electric vehicles throughout Europe, the electricity grid should be able to sustain the increase in demand.

Conclusion

CLECAT generally welcomes the proposal for a Regulation **on the deployment of Alternative Fuels Infrastructure** as it provides for clearer binding targets to ensure a harmonised deployment of the infrastructure throughout Europe, which is much needed to further decarbonise the transport sector. Nevertheless, some concerns remain on certain provisions, in particular the capability and quality of charging and refuelling points that do not go far enough. CLECAT therefore calls on the European Parliament and the Council of the EU to amend the proposal in order to increase its ambition and help the development of sustainable transport and logistics.