

ASECAP Position for the Revision of Directive 2014/94/EU on the deployment of alternative fuel infrastructure (AFID)

EU road operators following closely the revision of the Directive 2014/94/EU, as well as the relevant National Policy Frameworks.

ASECAP Road operators with more than 87,000 km of motorways across 21 member countries represent a key component for the deployment of the alternative fuels infrastructure in the TEN-T road network. ASECAP members are very much committed to reach the carbon-free emission target sets by the European Commission' with the Green Deal strategy. From that perspective, ASECAP members are actively supporting the European Commission's actions to improve the deployment and availability of the alternative fuels infrastructure in the EU network,.

ASECAP Members strongly apply the procedures at the national level, set by the Member States. In that regard, the National Policy Frameworks have set up procedures at the national level by which they address aspects such as standards, technical requirements, or guidelines for the installation of fuel stations along with its road networks.

ASECAP members actively support the alternative fuels in their road network to provide the highest efficiency to their customers as well as continuity of service. Toll road operators are committed to sharing their expertise and know-how to support sustainable road mobility. However, ASECAP members would like to raise the following concerns and recommendations:

- Following the European Green Deal targets, the EC and the national policy frameworks should ensure that a sufficient number of publicly accessible alternative fuels infrastructure will be deployed in an appropriate time schedule, taking into account the funding scheme required for such a deployment;
- The existing low number fleet of light-duty and heavy-duty vehicles using alternative fuels, as well as the big variety of the existing available alternative fuels, increases significantly the financial risk of the implementation of the alternative fuel infrastructure in EU road network;
- The business model to foster the deployment of a robust alternative fuel infrastructure needs to be defined
- The proper funding scheme, between the EU, MS, and Concessionaires should also be defined to support the important investments required for the further implementation of the alternative fuel infrastructure;

- Currently, the number of different types of alternative fuel for light-duty vehicles and heavy-duty vehicles are not enough to justify the adoption of one type of alternative fuel rather than another;
- The directive should continue covers electricity, hydrogen, biofuels, synthetic and paraffinic fuels, compressed natural gas (CNG), liquefied natural gas (LNG) and liquefied petroleum gas (LPG) as main alternative transport fuels;
- Alternative Fuel Infrastructure Directive should address publicly accessible fuels infrastructure;
- In the case of publicly accessible recharging infrastructure for passenger cars and light-duty vehicles along the TEN-T network should be over 350kw. However, in most of the cases, the existing road networks do not support this power. In addition, at the moment the number of electric vehicles is not enough to justify the adoption of one power rather than another;
- EU legislation should ensure that certain information on alternative fuels infrastructure (location of re-charging/re-fueling points) should be always available through digital means (e.g. app), provided by the responsible public body;
- The different concepts and price components exist to price electric recharging services, e.g. initial fee, time fee, kWh fee, possibly roaming fee, should be a harmonization of the display of recharging fees at EU level;
- All publicly accessible recharging points should fulfil a minimum common set of requirements;
- The economic impacts of measures, outlined in the Inception Impact Assessment, should be examined regarding:
 - growth and jobs in the production of vehicles/vessels and manufacturers of alternative fuels infrastructure;
 - the contribution to a bigger market in the EU for alternative fuels;
 - improvement of the international competitiveness of the European industry;
 - the reduction of the emissions of CO₂ from vehicle/vessel fleets and air pollutants from vehicle/vessel fleets.
- The objectives of the revision of the Directive could be better accomplished through the deployment of non-legislative tools based on guidance or recommendations by the Commission.

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