

Alternative Fuels Infrastructure Regulation

FuelsEurope supports the Green Deal's ambition for climate neutrality in 2050 and will work with the EU institutions, member states, and stakeholders, to help create the essential enabling policy framework. In this EU policy framework debate on the 2030 GHG reduction target and the 2050 climate neutrality objective, the decarbonisation of transport – a sector with far-reaching implications and unique challenges- is a precious opportunity for the EU economy to:

- Develop and deploy innovative low-carbon technologies in vehicles, vessels and fuels/energy.
- Create economic value for the transport systems and to help the relevant EU industries achieve world leadership.

At the same time, the transition should carefully address the societal aspects deriving from the changes in employment pattern, skills requirements and inequalities between EU regions and sectors of society. The availability of alternative fuels infrastructure is a key driver for investment in low- and zero-carbon¹ vehicles and vessels.

The proposed AFIR sets a framework for EU-wide and for national infrastructure plans by defining:

- An EU-wide approach for trans-European corridors (TEN-T) related to road, rail, aviation and waterways, both seaside as well as inland waterways.
- Ensuring coherence in the approach member states use to handle national, regional and sub-regional specificities related to the transport modes via their National Policy Frameworks (NPFs).

Infrastructure roll out should be based on member states individual demand profiles. Furthermore, there needs to be close coordination and integration with policies that impact fuels, vehicles and vessels, in particular the revised RED and revised CO₂ standards for cars and vans as well as heavy duty vehicles.

Some provisions should be strengthened with respect to publicly accessible infrastructure to ensure consumers can move across the EU using alternative fuels.

- **The proposed targets create a bias in the expected development of the new infrastructure.**
 - The targets for the energies under scope are based on different principles, which makes the framework oriented towards electrification and might regrettably prevent the markets to develop of the most competitive and effective lower carbon solutions.
 - The proposed proportionality principle between the fleet size and the power output of the infrastructure should not be limited to the electric recharging points and the principle expanded to all energies including hydrogen and LNG.
- **The proposed AFIR is an adequate infrastructure policy provided it is coherent with other instruments.**
 - The AFIR is supported as an adequate legal instrument to drive the deployment of alternative fuels infrastructure.
 - The AFIR should be coherent with other infrastructure related initiatives like the trans-European network (TEN-T) development to avoid duplication or gaps.

¹ 'zero-carbon' should include use of sustainable liquid fuels from non-petroleum origin, with no or very limited net CO₂ emissions during their production and use compared to petroleum based fuels.

- **The proposed AFIR should promote the development of infrastructure over all transport sectors and all alternative fuels²³ or energies.**
 - We support the regulation covers next to road and shipping, rail and the airport infrastructure for ground movements and sustainable aviation fuel supply.
 - We support the broad definition of alternative fuels under the proposed regulation and suggest the category (a) ‘Alternative fuels for zero-emission vehicles’ is clarified to become ‘Alternative fuels for zero carbon emission vehicles and vessels’.

- **The proposed AFIR should address the disparities in the deployment of publicly available alternative fuel infrastructure across the Union.**
 - NPFs should be considered as the main regulatory instrument to guarantee suitable solutions for infrastructure and vehicles. Current NPFs are not sufficient detailed in their roll-out of alternative fuels infrastructure, make no distinction between urban and rural requirements and fail to provide adequate support to help implementation.
 - The AFIR and NPFs should focus on publicly accessible infrastructure only. A distinction should be made between public infrastructure on public grounds and public accessible infrastructure on private grounds. If the owner of a private ground allows public access, then a criteria is needed beyond which the owner should comply with the public access on public ground requirements. The criteria mentioned above should be limited to the technical and safety requirements, without influencing pricing or other economic aspects.
 - The definitions of ‘recharging points’ and ‘refuelling points’ should make reference to ‘accessible to the public’. This would include the inclusion of private stations that allow access to private users.

- **The proposed AFIR should promote digital information and the use of standards to allow safe use and interoperability of infrastructure.**
 - Information related to the alternative fuel infrastructure should be made available to the consumer by digital means. That information could include location, types and capacities of recharging/refuelling points.
 - Standards might include all infrastructure, not only publicly accessible or recharging points.
 - As a part of the development of new standards and parameterisation of alternative fuels, it is recommended to introduce the certification of hydrogen as a fuel and a coherent European regulation on common standards and technical parameters for the construction of hydrogen refuelling stations. This will enable a holistic and dynamic development of hydrogen as a fuel in the EU. Hydrogen in transport is currently one of the least regulated alternative fuels.

- **The proposed AFIR should enable financial support for rollout.**
 - Alternative fuel refuelling sites should be provided with time-limited support for capital and operating expenses, e.g. direct grants, demand guarantees etc, to address initial underutilisation.
 - In order to be highly effective, member states should be obliged to develop financing plans for the AFIR alternative fuel infrastructure objectives:
 - It is proposed to promote both debt and non-reimbursable funds for the development of alternative fuels infrastructure depending on the level of commercialisation and scale in the market;

² ‘zero-carbon’ should include use of sustainable liquid fuels from non-petroleum origin, with no or very limited net CO₂ emissions during their production and use compared to petroleum based fuels.

³ Alternative fuels from recycled CO₂ and green/blue hydrogen do not need new, dedicated infrastructure.

- The presentation of financial assurance plans should be required as part of the acceptance of the National Policy Framework Plans.

FuelsEurope is ready to work with the EU to contribute to the carbonisation of the mobility sector in a sustainable, affordable and social inclusive way.

FuelsEurope, the voice of the European petroleum refining industry

FuelsEurope represents with the EU institutions the interest of 41 companies operating refineries in the EU. Members account for almost 100% of EU petroleum refining capacity and more than 75% of EU motor fuel retail sales.

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