



# STATEMENT ON EP TRAN COMMITTEE ADOPTION OF AFIR REPORT

## ChargeUp Europe:

- Welcomes the adoption of the TRAN committee AFIR report and the inclusion of ambitious EV infrastructure targets
- Has however deep concerns about retrofit requirements.

**We call on the European Parliament to remove the retrofit obligation for existing public AC charging stations ahead of the plenary vote.**

### Introduction

On 3 October, the European Parliament's TRAN Committee approved MEP Ismail Ertug's report on the proposal for a Regulation for the Deployment of Alternative Fuels Infrastructure (AFIR), **an important step on the journey to a harmonized framework for publicly accessible charging in Europe.**

MEPs agreed on ambitious EV charging infrastructure targets, allowing the EU to achieve its decarbonization objectives but are asking for retrofitting of existing AC stations with payment card readers, which would undermine the market for publicly accessible AC charging and would be a significant step backwards.

### Overview

**The good – Ambitious EV charging infrastructure targets to get Europe on track towards a decarbonized transport system.**

We welcome the TRAN Committee's agreement to **implement ambitious capacity-based targets based on the level of fleet electrification.** This allows for an approach to infrastructure deployment tailored to the market conditions in each Member State.

ChargeUp Europe also welcomes the TRAN Committee's recognition of the **roaming and the subscription** model to ensure a seamless EV driving experience. Both bring freedom of choice and significant benefits to consumers: favorable

and tailored pricing, accurate, advanced information on location and availability of charging stations, and much more.

At the same time, it also provides essential **grid integration benefits** as the subscription model enables smart charging, allowing EV drivers to charge when there is spare capacity on the grid, at off-peak hours, and when the grid is greenest.

Other positive proposals include the creation of a **common European data access point** allowing a simplified and **harmonized approach on data**, a mandate on smart charging for new and renovated EV chargers, and the **introduction of time limits between the permitting request and the realization of the connection to the grid for the installation of an EV charger.**

#### **The bad – retrofitting AC stations with payment card readers**

Although the TRAN Committee made many improvements to the Commission's proposal, on one key aspect MEPs have proposed taking major step backwards: **calling for a retrofit of AC stations with payment card readers.**

Mandating a card reader retrofit on AC stations would completely distort the existing AC charging ecosystem, by obligating the introduction of a payment technology that is not suitable or used for AC charging.

In today's market, there are many ways for the EV driver to pay for an ad-hoc recharging session, from mobile phones to contactless payment options, and these do not require the use of a pin-pad. **Physical credit/debit cards payments on**

**AC stations represent a tiny fraction of payments.** Mandating the introduction of payment card readers simply doesn't reflect the consumer or business use cases.

**The technical and economical constraints to retrofit AC stations are severe and a retrofit obligation will seriously damage any business case for AC stations and potentially increase the charging cost for the EV driver, as the increased hardware and operating cost risk being transferred to the consumer.**

Additionally, as mentioned previously, this requirement does not reflect current consumer behavior nor is it future proof. As a result, **Charge Point Operators (CPOs) will be forced to spend time and resources to replace perfectly working existing AC stations with new ones instead of focusing on rolling out new recharging locations and growing the size of the public network to meet AFIR targets.**

Additionally, most of these existing AC stations are nearing the end of their life-cycle towards the end of this decade, and will be naturally replaced due to innovation and rapid technological developments. **This means that any investment made to retrofit payment methods on these chargers by 2027 would only serve a limited time span, which makes the investment case even more challenging.** Maintaining the retrofit obligation for AC stations will therefore result in stranded assets and lost investment opportunities which should be dedicated to developing innovations in the charging sector and rolling out stations in new locations.

ChargeUp Europe is the voice of the electric vehicle (EV) charging infrastructure industry, bringing together the charge point operators, e-mobility service providers and hardware manufacturers, with the aim of ensuring a seamless charging experience for all European EV drivers. As of today, our 24 member companies represent over 500.000 charging points in all 27 EU Member States.