



# THE GREEN DEAL INDUSTRIAL PLAN

## *How a thriving, EV manufacturing sector can support the EU's green & digital economy*

### ChargeUp Europe calls for:

- ✦ Centering the e-mobility value chain in the Green Deal Industrial Plan: charging stations, software, and other EV enabling tech, should be explicitly recognised as “clean tech”;
- ✦ Including EV charging infrastructures amongst the sectors that will benefit from simplified and accelerated permitting processes, integrating the guidance from the Sustainable Transport Forum;
- ✦ Avoiding distortion of the single market by complementing action on public subsidies with an EU-wide instrument; as EV charging is a rational, market-driven sector, funding should target the “enablers” of the transition e.g. grid capacity & smartness, training and re-skilling;
- ✦ Bringing a sharper focus on building a single market and the benefits derived from leaner, simpler regulatory frameworks. The Net Zero Act should identify clean tech products that would benefit from the introduction of type approval, such as EV chargers.

### Overview

ChargeUp Europe welcomes the European Green Deal Industrial Plan (GDIP), and its focus on building a strong industrial base for the EU’s “clean tech.”

The GDIP is proposed in a context where massive investments are to flow to clean tech over the coming decade – for the EV charging infrastructure sector alone, investments should triple by 2030.

**The GDIP is a unique opportunity to support these investments, expand the EU’s green industrial base, enhance the EU’s industrial competitiveness and further establish Europe as a clean tech global leader – a title our trade partners are also vying for.**

ChargeUp Europe is of the view that the GDIP could helpfully be strengthened along four dimensions:

## I - Center the e-mobility value chain in GDP

The e-mobility dimension in the GDP is **generally muted** – a surprise considering the role transport will play in the clean economy transition and the leading role globally Europe already has in this area, via policy direction and development and manufacturing, and which should be maintained.

ChargeUp Europe calls for a stronger focus on the e-mobility value chain. **Charging stations, software, and other EV enabling tech, with their important manufacturing footprint in Europe, should be explicitly recognised as falling under “clean tech” in the plan, supporting the anchoring of manufacturing facilities for EV chargers on our continent.** They play a key role in empowering other actors in the e-mobility value chain to become greener.

## II - Simplify permitting processes

Grid connection and permitting processes are the number one bottleneck charge point operators (CPOs) face in the rollout of charging infrastructures. The Net-Zero Industry Act will reduce the length and enhance the predictability of permitting processes by defining specific time limits for different stages of permitting, and build Member States' administrative capacity, e.g. by introducing a 'one-stop-shop'.

It is of critical importance to include EV charging infrastructures under the “simplification of permitting” pillar of the Act. This is a low hanging fruit, with the possibility for the Commission to integrate the guidance from the Sub-group on best practices of public authorities to support the deployment of recharging infrastructure of the Sustainable Transport Forum (STF) convened by DG MOVE.

## III - Propose an EU wide funding instrument and direct funding to green transition “enablers”

While public subsidies can be part of the EU's answer, they also have strong distortive effects on the single market. **Subsidies should be complemented by a more structural answer to the EU's investment needs by proposing a European Sovereignty Fund, as proposed, with a strong focus on the e-mobility value chain.**

The modalities for this fund must be established in close coordination with Europe's “clean tech” industries, including the EV charging infrastructure sector, to ensure cost-effectiveness and limit regulatory capture.

The EV charging sector is a rational, market-driven sector – funding should primarily go to the enabling conditions for “clean tech” to be deployed and thrive in Europe. In particular, funding should support much needed investments in:

- ⚡ **Grid upgrades and capacity;**
- ⚡ **Training and reskilling,** with a particular focus on ensuring that workforce shortages in the electrical and software sectors are urgently addressed, going beyond financial mobilisation through the Resilience and Recovery Facility (RRF), which has not reached convincing scale on this aspect.

There is a unique role for public intervention in addressing large public goods and bottlenecks – this should be the focus of the intervention.

#### IV – Leverage the single market and regulatory simplification much more strongly

The EU has successfully placed a strong internal market at the heart of its economic prosperity. Unfortunately there is no single market for EV charging today. The GDIP underestimates the impact of removing regulatory and trade barriers (a cost-free effort) for a sector to thrive. That focus must be brought back into the Plan, as an open faucet of public subsidies is not going to address these structural blockers.

Financial intervention must be complemented by a more sustained effort to reduce unwieldy bureaucracy and review requirements (including national requirements that fragment the single market) for product development, validation, certification and placing on the market to make them faster and simpler. Otherwise the

regulatory dimension of the Net Zero Industrial Act will be under-leveraged. **Simpler, leaner, faster regulatory frameworks are key for growth.**

In addition, the Net Zero Act should identify clean tech products that would benefit from the introduction of type approval – this would provide a strong boost to the manufacturing of EV chargers in the EU.

ChargeUp Europe is available to exchange on how best to make GDIP a success story for the EU's industrial and manufacturing basis, strengthen the competitiveness of the EU's economy, develop a strong pipeline of clean tech products and solutions, and place the EU at the forefront of the global clean tech race.

Endnotes:

(i) Required Capital Expenditure for Charging Infrastructure in EU-27 expected to go from €5bn in 2021 to €15.4bn in 2030 – [State of the Industry Report](#), ChargeUp Europe

(ii) [Simplifying & Accelerating the Grid Connection & Permitting Processes: An Open Letter from Europe's EV Charge Point Operators](#)