

22 September 2021

## Delivering the Green Deal on transport through digitally driven and driver friendly electric vehicle charging infrastructure rollout

Dear Transport Ministers,

ChargeUp Europe, the voice of the European electric vehicle (EV) charging infrastructure industry, which brings together charging point operators, e-mobility service providers, and EV infrastructure hardware and software manufacturers, is writing to you in advance of the informal meeting of Transport Ministers on 23 September regarding the deployment of EV charging in Europe.

The EV sector is growing rapidly, with 10% of new cars sales in Europe in 2020 being electric<sup>1</sup> and supported by major electrification commitments by Europe's leading OEMs. In the coming years, EVs are expected to become a mainstream drivetrain and the primary road transport method in Europe.

In light of these developments, we welcome the European Commission's proposal for a revised Regulation on alternative fuels infrastructure (AFIR). It contains many strong, forward-looking provisions to support the deployment of EV charging infrastructure, in particular:

1. The legal basis of a regulation will ensure these proposals are implemented in a timely and harmonized manner across all EU member states, providing for the best experience for Europe's growing number of EV drivers while meeting Europe's Green Deal targets.
2. The introduction of mandatory, capacity-based targets and national planning frameworks will ensure minimum coverage across the EU, send a strong signal to the market to provide investment certainty, and encourage member states to plan their own infrastructure development in a coordinated manner to take maximum advantage of the many system-wide benefits of e-mobility. While ChargeUp Europe recommends that the capacity targets need to be increased, the fact that there are binding targets is a significant step in the right direction.

However, we believe there are some refinements needed in the proposal, in particular regarding payment provisions for publicly accessible charging stations, in order to ensure a seamless, convenient, and affordable charging experience for the EV driver.

The commercial transaction of the EV charging session on publicly available charging stations can be done in two ways: via a subscription model with an e-mobility service provider or via ad-hoc charging. While the majority of charging sessions are carried out via subscriptions, both of these approaches are essential to getting the most out of e-mobility, and both approaches should thus be properly recognised and supported in the revised AFIR.

1. **Ensuring ad hoc charging and payment is essential but should be considered as complementary with other solutions, most notably those that include payment as part of a service such as the subscription model for the driver.** Through affiliation with an e-mobility service provider, the driver can benefit from additional tailor-made functionalities such as negotiated tariffs for charging, automated authentication, information on the location of the charging station, power delivered, accessibility of the station at needed time, reservation and many others.

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<sup>1</sup> IEA - [Global EV Outlook 2021](#)

In ensuring ad hoc payment availability it is **important that the means of payment are not prescriptive**. Payment technologies and consumer behaviour are evolving rapidly and so mandating specific payment options would risk locking in a method that could become outdated in the future. The market needs to be able to react and offer the best service for a good price. **The proposal should keep an open approach to payments and not prescribe specific technologies for ad-hoc payments.**

2. The subscription model supports roaming, which allows drivers to charge at stations belonging to the network of another operator (not their “home” operator) with a single subscription provided by a mobility service provider. This applies both within and across national borders. **A minimum level of accessibility to the charging stations via roaming should be ensured via the legislation to optimize the charging network accessibility to the driver but also to foster the competitiveness of this fast-growing market. Currently these provisions are missing from the AFIR proposal.**
3. **The subscription model is also essential to support smart charging, vehicle-to-X functionalities and to unlock many of the energy efficiency and system-level benefits that come from EVs and charging.** To enable control on the charging and discharging of energy to and from the EV, it is necessary to be able to communicate with the EV driver and establish a commercial agreement. This is not feasible with ad-hoc payment since there is no authentication of the EV driver, no communication to express consent, and no ongoing communication around charging preferences.

The AFIR can substantially improve the market governance for the deployment of e-mobility services, support an improved integration of transport and energy systems, and ensure that Europe’s growing number of EV drivers are able to rely on a transparent, open, and reliable EV charging network. As the professionals who build and operate these networks, we request that you consider the inclusion of these key aspects in your discussions this week and in the future. We would be very happy to meet with each of you, or your designated representatives, to further discuss these and other key elements of the proposal.

We look forward to working together towards the decarbonisation of the EU transport sector and the deployment of a comprehensive, digitally driven EV charging network throughout Europe.

Yours Sincerely,

*Christopher Burghardt*

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**President, ChargeUp Europe**

### ***About ChargeUp Europe***

*ChargeUp Europe is the industry Association representing the electric vehicle (EV) charging infrastructure industry. ChargeUp Europe works to accelerate the switch to zero emission mobility and ensure that people can have a seamless driver experience with access to high quality, readily available charging infrastructure across Europe. The Association brings together EV charging infrastructure sector players to work together to pursue the development and rollout of high-quality infrastructure throughout Europe. As of today, our member companies represent over 300.000 charging points in all 27 EU Member States.*

**Rue de la Loi 227, 1040 Brussels, Belgium**

+32 2 669 16 00, [secretariat@chargeupeurope.eu](mailto:secretariat@chargeupeurope.eu)