

Alternative Fuels Infrastructure Regulation (AFIR)

Road transport

The Commission's AFIR proposal is well aligned with bp's views on decarbonising the transport sector. We currently operate more than 7,500 charging points globally and we target to increase this to at least 70,000 by 2030.

Whilst investment in alternative fuels infrastructure should be **market-led**, we fully **support the proposed fleet- and distance-based EV recharging targets** for passenger cars, as well as fleet-based **EV recharging and hydrogen refuelling targets for trucks**. Setting these targets would give investors and customers confidence and contribute to the rapid uptake of zero and low emissions vehicles. Any changes to the targets, especially upwards, should be carefully considered to avoid over-build of infrastructure which could harm investor confidence and ultimately delay deployment of market-led infrastructure.

The biggest obstacle to increased deployment of EV charging are **delays in the permitting process**, especially in relation to obtaining building permits and grid connections.

- We believe this deserves specific attention under AFIR as the permitting process has in our experience taken up to 18 months in extreme cases.
- Member States should include in their national policy frameworks (Article 13) clear time limits of 3-4 months between the building permit and grid connection request and the realisation of the grid connection and obtaining all necessary permits, respectively.

We fully support the goals of the AFIR proposal to make EV driving more accessible and user-friendly for EU citizens. Ensuring **ad hoc charging** at publicly accessible stations – to complement subscription-based payment models – is essential to accelerate the transition towards e-mobility.

- That is why we support the proposed provisions around mandating **payment card terminals**.

The proposed **definition** of “publicly accessible charging infrastructure” is too vague and leaves room for interpretation, and risks not providing the necessary clarity for operators, public authorities and EV drivers.

- The revised legislation should propose clear and coherent definitions, ensuring sufficient clarity for **Member States** in terms of target setting, eligibility for public financing, or technical and legal requirements.

- For **operators**, it is important that these definitions are clear as the requirements for the charging stations will change depending on how they are classified.
- Finally, **EV drivers** need to know what service and functionality they can expect when charging.

We would recommend following the suggestions made by ChargeUp Europe around revised definitions for “fully publicly accessible”, “limited publicly accessible” and “private accessible” charging stations¹.

In the hard-to-decarbonise **heavy-duty** segment, **low carbon hydrogen and bio-LNG** have an important role to play alongside battery-electric trucks. The AFIR proposal currently does not include quantified targets for LNG refuelling stations, sending the wrong signal for the uptake LNG-powered trucks. LNG infrastructure is key to moving to bio-LNG. Whilst the infrastructure for LNG and bio-LNG is the same, any support could, for instance, be conditional on a minimum share of bio-LNG. Fuel suppliers would be incentivised to supply bio-LNG instead of fossil LNG via the RED transport obligation scheme.

- We would encourage the co-legislators to introduce distance-based LNG refuelling targets similar to those for H2 refuelling.

Shipping

The vast majority of deep-sea shipping is going to require sustainable marine fuels to decarbonise. AFIR provides an opportunity to complement the proposed Fuel EU Maritime Regulation by supporting refuelling facilities for sustainable marine fuels at ports.

¹ ChargeUp Europe’s proposed definitions can be found on p. 7-8 of their AFIR position paper: <https://static1.squarespace.com/static/5e4f9d80c0af800afd6a8048/t/6182518c27a4911f19f16aac/1635930509891/For+Consumers+and+Climate+-+ChargeUp+Europe+position+on+AFIR+proposal.pdf>

Key points:

- Member States should set time limits (3-4 months) for grid connection and permitting procedures for EV charging infrastructure
- Clarify definitions of “publicly accessible”, “limited publicly accessible” and “private accessible” EV charging stations
- Introduce distance-based bio-LNG refuelling targets for heavy-duty vehicles, like those proposed for hydrogen refuelling
- Consider support for refuelling of sustainable marine fuels at ports