

Public consultation concerning the Revision of the Directive 2014/94/EU on the Deployment of Alternative Fuels Infrastructure (AFID)

Fields marked with * are mandatory.

Introduction

Following the policy ambition set out by the European Green Deal for the EU to become a climate neutral economy by 2050, transport emissions have to decrease by 90% by that year. Fuels decarbonisation and the deployment of adequate alternative fuels infrastructure are key necessities in this context. Forecasts foresee a strong increase of market uptake, particularly of alternative fuels road vehicles, post 2020. Recharging and refuelling infrastructure needs to be ready to meet the demand for sustainable alternative fuels in all modes of transport. A lack of interoperable, easy-to-use infrastructure for recharging and refuelling those vehicles, and vessels, should not become a barrier and slow-down market uptake.

An uncoordinated introduction of alternative fuels infrastructure policies in the Member States can lead to fragmentation of market action and a lack of security for long-term public and private investment in vehicle and fuel technologies. Directive 2014/94/EU on deployment of alternative fuels infrastructure (AFID) was adopted in 2014 to ensure a common framework of measures for the deployment of alternative fuels infrastructure in Member States. The central means are national policy frameworks that Member States had to adopt in 2016. Moreover, the Directive sets technical specifications for the interoperability of infrastructure. However, alternative fuels infrastructure is not available evenly across the EU. Member States' national policy frameworks under Directive 2014/94/EU show, on average, a lack of ambition to ensure adequate rollout and easy cross-border usability in the critical period post 2020.

The European Commission is inviting the public and stakeholders to express their opinion and share information on the impact of the existing Directive as well as on possible measures and potential impacts of its revision. Information received in this consultation will support the evaluation and the Impact Assessment that the European Commission is currently carrying out. Respondents are welcome to expand on their answers in the text boxes foreseen for this purpose. At the end of the questionnaire, it is also possible to upload supporting evidence documents to complement the contribution.

About you

* Language of my contribution

English

* I am giving my contribution as

Business association

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International Organisation name

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* Organisation size

Micro (1 to 9 employees)

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Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

The following questions of the consultation are open to all participants, but address particularly expert views and require more detailed and technical input.

General assessment of the Directive's relevance and scope (questions related to the evaluation)

The Alternative Fuels Infrastructure Directive aims at a coordinated approach for the roll out of alternative fuels infrastructure in Member States by means of setting obligatory requirements for the development of national policy frameworks. Member States had to outline national targets, objectives and supporting actions for the deployment of such infrastructure that should be coordinated and coherent at EU level. Common technical specifications adopted under that Directive should support this approach.

1. In your view, how relevant is a policy on alternative fuels infrastructure at EU level as established by the Alternative Fuel Infrastructure Directive to support the uptake of alternative fuels?

Very relevant

Relevant

Less relevant

Not relevant

No opinion

2. Currently, the Directive covers electricity, hydrogen, biofuels, synthetic and parafinic fuels, compressed natural gas (CNG), liquefied natural gas (LNG) and liquefied petroleum gas (LPG) as main alternative transport fuels. In your view, is this scope still appropriate in the context of the long-term objective of the European Green Deal to reduce transport emissions by 90% by 2050?

It is fully appropriate

It is appropriate

It is rather not appropriate

- It is not appropriate
- No opinion

In case you answered "It is rather not appropriate" or "It is not appropriate", can you please indicate why?

- Some fuels are missing (please specify)
- Some fuels are not relevant anymore (please specify)
- Other (please specify)

Please specify "Some fuels are missing"

Please specify "Some fuels are not relevant anymore"

A major focus should be on electrification of vehicles. To achieve climate neutrality, a 90% reduction in transport emissions is needed by 2050. The electrification of vehicles (charged by clean energy) and the deployment of smart charging infrastructure are no-regret options in the path towards decarbonisation. Battery electric vehicles have a conversion efficiency of 80-90% from tank to wheel, compared to 20-30% for ICE.

Please specify "Other"

3. Currently the Alternative Fuel Infrastructure Directive covers alternative fuels infrastructure for road and shipping. In your view, is this appropriate?

- the Directive should also cover rail infrastructure
- the Directive should also cover airport infrastructure for ground movements (e.g. vehicles for transport of passenger or for supporting taxiing of aircraft etc.)
- Other (please specify)
- the Directive already covers all relevant transport modes
- No opinion

Please specify

4. The Alternative Fuels Infrastructure Directive currently requires from Member States to establish "National Policy Frameworks" (NPFs). Within this framework, Member States have to develop targets and objectives for the deployment of alternative fuels infrastructure, based on an assessment by the Member States of national, regional or EU-wide demand. In your view, are the NPFs the right instrument to ensure the development of a coherent infrastructure network throughout the EU?

- They are the right policy instrument
- They are the right instrument but the provisions in the directive are not prescriptive enough to avoid diverging interpretation and application by Member States. The provisions in the directive should therefore be strengthened
- They are only partly sufficient. Additional/complementary instruments would be needed to avoid diverging interpretation and application by Member States
- They are not the right instrument because they are not sufficiently stringent. Therefore they should be replaced by alternative, more stringent instruments
- They are not the right instrument and should be abandoned without being replaced by alternative instruments
- No opinion

Please explain briefly your answer in particular what additional/complementary /alternative instruments you would suggest.

The NPF mechanism should be reinforced by taking inspiration from the Governance Regulation and the development of National Energy and Climate Plans that follow a common binding template to ensure comparability.

5. Currently the Alternative Fuel Infrastructure Directive addresses publicly accessible fuels infrastructure only. Should it also address infrastructure not accessible to the public?

- It should cover all infrastructure, publicly accessible and not publicly accessible

- It should cover publicly accessible infrastructure only, with distinction required between public infrastructure on public grounds and publicly accessible infrastructure on private grounds (“Semi public” infrastructure)
- The current scope (publicly accessible fuels infrastructure only) is fine
- Other (please specify)
- No opinion

Please specify

Covering also private infrastructure would be a way to make up for the weaknesses of the revised EPBD, notably to address pre-cabling and simplified permitting. Requirements could be adapted for private infrastructure, but at least interoperability should be foreseen.

As 42% of the EU population lives in multi-family buildings and as most offices are located in shared commercial buildings, there is also a strong need for the revised AFID to tackle the specificities of these building types, which might include semi public infrastructure too.

Regarding multi-family buildings, if each occupant installs an individual and expensive charging solution, it would be more expensive and would increase the load consumption of the building, unless properly planned. The installation of centralized smart charging for common use by building residents should be favored over the individual installation of chargers in different moments. This is a cost-efficient solution which should be supported through public incentives due to the higher capex investment.

6. The Alternative Fuels Infrastructure Directive currently requires from Member States to ensure that relevant, consistent and clear information is made available to consumers/users as regards those motor vehicles which are fueled with alternative fuels. Such information has to be made available in motor vehicle manuals, at refueling and recharging points, on motor vehicles and in motor vehicle dealerships in their territory (Article 7). In your view, are the current provisions in AFID effective in ensuring that consumers/users receive relevant, consistent and clear information on the compatibility of their vehicle engine/model with the alternative fuels /recharging options available at each refueling/recharging point?

- These provisions in the directive are effective
- These provisions in the directive are only partly or not at all effective and additional/complementary provisions are needed
- The directive is not the right instrument and corresponding provisions should be replaced by more effective instrument(s)
- The directive is not the right instrument and corresponding provisions should be abandoned without being replaced by alternative instruments
- No opinion

Please explain briefly your answer.

It is important to provide information on the capability of EV to provide grid services and communicate its data. A sort of V2G Readiness Indicator should be developed.

Main problems

1. A rapid uptake of alternatively fuelled vehicles and vessels is expected in the next decade. For example, the European Green Deal considers it likely that by 2025 around 13 million zero and low emission vehicles will circulate on roads. In your view, are the National Policy Frameworks the adequate instrument to ensure that a sufficient number of publicly accessible infrastructure will be deployed over the next decade?

	Fully adequate	Adequate	Rather not adequate	Not adequate	I don't know
Electric rechargers for cars and light duty vehicles in urban/suburban agglomerations			X		
Electric rechargers for cars and light duty vehicles along the main highways			X		
Electric rechargers for trucks / heavy duty vehicles in urban/suburban agglomerations			X		
Electric rechargers for trucks / heavy duty vehicles along the main highways			X		
Electric rechargers for busses			X		

2. In your opinion, do users of electric vehicles face problems when it comes to payments when charging their vehicles at re-charging points operated by an entity with which the user does not have a contract?

- Yes, frequently
- Sometimes
- Seldom
- Never
- I don't know

3. In your view and experience, is the information that is currently provided on location, availability, etc. of re-charging and re-fuelling points sufficient to cover the needs of the user?

- Information to users is fully sufficient
- Information to users is largely sufficient
-
- Information to users is insufficient
- I don't know

4. The Commission assessment of the national policy frameworks developed under the Directive shows a variety of approaches to setting targets, objectives and supportive actions. Please indicate to what extent do you agree with the following observations?

	Fully adequate	Adequate	Rather not adequate	Not adequate	I don't know
"There is uneven and insufficient deployment of alternative fuels infrastructure within a Member State because the Directive does not specify in sufficient detail the requirements for the roll out of alternative fuels infrastructure, with respect to the required number and technical requirements."		X			
"There is uneven and insufficient deployment of alternative fuels infrastructure across Member States because the Directive does not ensure that Member States cooperate with stakeholders and with other Member States to deliver a sufficiently dense and interoperable network throughout the EU."		X			
"Users cannot easily recharge or refuel their vehicles/vessels throughout the EU because the directive does not ensure a uniform approach towards the use of alternative fuel infrastructure and subsequent payments."		X			

5. In your view, are there other causes of the limited impact of the Directive? Please explain.

- The limited enforcement power has led to diverging and inadequate charger coverage, fragmented national market set-ups and technology specifications, and poor implementation of technical requirements,
- The directive is focused on inter-city, TEN-T charging although majority of charging happens at home or at work. Fast charging on motorways is a niche compared to slow overnight charging in urban streets,
- A distinction between different types of accessibility/placement/ownership/technology type is needed. For all of them, a set of minimum requirements on access, operation and interoperability is needed.

6. Are there other aspects you would like to underline regarding the functioning and /or impact of Directive 2014/94/EU? Are there issues that could be simplified?

- The definition of "Infrastructure" should be revised to also include "distributed infrastructure", i.e. myriads of small decentralized assets that together create an infrastructure. The focus should shift from large high power charging stations to massive deployment for slow but ubiquitous charging (7kW/22kW). 100 small distributed infrastructure would have more impact than one single big one,
- Information on availability, location, payment methods should be reinforced to the benefit of consumers,
- Address further market fragmentation so that the rollout is not hampered by inconsistent rules: specific local technical hardware, metering requirements, public data transmission obligations or fire safety requirements for parkings,
- let the market function: no need for retail price regulation, allow MSPs access to CPO networks based on commercial deals, standardisation supported by rules establishing level playing field/competition,
- A regular review process to cope with market developments.

This section aims at identifying potential policy measures to overcome identified problems related to the uptake of alternative fuels.

1. In your opinion, how important is it to revise the following parts of the Alternative Fuels Infrastructure Directive?

	Very important	Important	Less important	Not important	I don't know
Scope with respect to fuels addressed in the directive	X				
Scope with respect to transport modes addressed in the directive		X			
Provisions on ensuring an appropriate infrastructure coverage	X				
Provisions on monitoring and reporting		X			
Provisions on interoperability and user information	X				
Provisions on technical specifications	X				
Provisions on market access	X				
Provisions on interlinkages between the electric vehicles and their infrastructure and electricity markets	X				

Targets to achieve a coherent network

2. Right now, Member States are obliged to establish targets for the roll out of alternative fuels infrastructure through their national policy frameworks. However, those national targets are being set without using a common methodology. In your view, how useful are mandatory deployment targets for Member States that are derived by using a common methodology to ensure a coherent minimum alternative fuels infrastructure roll out in the following areas:

	Very useful	Useful	Less useful	Not useful	No opinion
Electricity for cars & vans	X				
Electricity for heavy duty vehicles	X				
Electricity for busses	X				
Electricity for inland waterway		X			
Electricity for short-sea shipping		X			
Hydrogen for cars & vans				X	
Hydrogen for heavy duty vehicles				X	
Hydrogen for inland waterway				X	
Hydrogen for short-sea shipping				X	
CNG for cars & vans				X	
LNG for heavy duty vehicles				X	
LNG for inland navigation				X	
LNG for maritime vessels				X	
On shore power supply at inland waterway ports			X		

On shore power supply at maritime ports			X		
Hydrogen for rail				X	
Electricity for aviation ground movement			X		
Electricity for port service provisions (pilotage, towage, cargo handling equipment)	X				

In order to address the uniformity of charging infrastructure across Europe, binding concrete minimum targets per Member State should be set for the deployment of publicly accessible charging infrastructure, together with ambitious requirements for charging on private sites, notably:

- Requirements on medium and large commercial properties (mostly residential, office and leisure buildings /parkings in cities),
- Upgraded cabling requirements in (non-)residential buildings,
- Requirements on high-powered charging points in rural areas and along highways. The current target of one charging point per 60 km along the TEN-T Network is not sufficient,
- Requirements for the deployment of infrastructure for electric commercial vehicles in urban areas as well as support shared charging infrastructure at distribution centers and truck depots.

Reply to questions 3-10 only in case you believe that mandatory deployment targets are useful for at least some of the above mentioned areas.

In your view, should such mandatory targets be applicable throughout the whole transport network or only for specific parts of it?

- Applicable to the TEN-T core network (including the most important transport connections and nodes in the EU represented by the core network corridors (railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals))
- Applicable to the TEN-T core and comprehensive network (covering important transport connections and nodes in all EU regions)
- Applicable throughout the whole transport network
- Other (please specify)

Please specify

Targets for the whole TEN-T core and comprehensive transport network, including commercial sites publicly accessible and truck depots, need to be accompanied with upgraded cabling/charging requirements in residential and non-residential buildings.

Any methodology supporting the achievement of targets should pursue efficient planning and therefore take into account the status of the electricity system (i.e. possible congestion areas, digitalisation and flexibility of the grid), beyond the fleet and traffic volumes and spatial requirements.

Planning of infrastructure deployment should be part of the emerging discussions about local flexibility. For example, DSOs should publish maps showing where implementing a charging station could be beneficial to the grid.

Also, infrastructure deployment should be aligned with availability of renewable resources. For example in countries with a lot of sunshine, workplace charging should be ensured during daytime when PV is producing the most.

4. In your view, who should set mandatory deployment targets?

- Member States under national law but following a common European methodology set out in EU legislation
- European legislation to set binding targets for Member States following a common methodology
- Other (please specify)

Please specify

5. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for passenger cars and light duty vehicles along the TEN-T network?

- 50 kW
- 100 kW

- 150 kW
- 350 kW
- Other (please specify)

Please specify

Public charging infrastructure should not only be high-power fast charging infrastructure, but also, and mainly, normal-power (7kW-22kW) charging infrastructure (for overnight or for long duration charging during work hours or for drivers who do not have off street parking). However, along the TEN-T network a rapid charging would be necessary for EV drivers. This should not preclude that fast charging can be also smart. Fast charging enhanced by onsite energy storage and an energy management system can reliably provide adequate power to EV drivers and support the grid. This setup further makes the integration of locally produced, renewable energy sources into the energy mix possible and could eventually provide other services for the grid.

6. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for heavy duty vehicles along the TEN-T network?

- 350 kW
- 1000 kW
- >1000 kW
- Other (please specify)

Please specify

7. In your view, which power should in case of mandatory requirements shall apply for onshore power supply in maritime ports of the TEN-T network?

- >100 kW
- >500 kW
- >1 MW
- Other (please specify)

>100 kW for what types of vessels?

>500 kW for what types of vessels?

>1 MW for what types of vessels?

Please specify

8. In your view, which alternative fuel should - in case of mandatory targets - port service providers (pilotage, towage, cargo handling equipment) have to offer in ports of the TEN-T network?

- Electricity
- Hydrogen
- LNG
- CNG
- LPG
- Other (please specify)
- Any of the above, chosen freely by the port service provider

Please specify

9. In your view, which power should - in case of mandatory targets - be required for recharging infrastructure for inland waterways vessels along the TEN-T network?

- 350 kW
- 1000 kW
- >1000 kW
- Battery swapping technology
- Other (please specify)

Please specify

10. In your view, how could the compliance with mandatory targets be best monitored?

- Through reporting of public authorities in Member States to the EU
- Through direct monitoring of infrastructure roll out at EU level
- Other (please specify)

Please specify

Other deployment measures for publicly accessible and non publicly accessible recharging points

11. Do you believe that owners of an electric vehicle should be entitled to have a re-charging point installed in their neighborhood?

- Yes
- No
- No opinion

12. How useful would you consider the following measures to facilitate and accelerate the development of recharging points not accessible to the public (such as private re-charging points in apartment buildings, offices, etc.)?

	Very useful	Useful	Rather not useful	Not useful	No opinion
Mandatory installation of recharging points in car parks of non-residential buildings (e.g. office buildings) that go beyond existing provisions in the Energy Efficiency for Buildings Directive	X				
Mandatory installation of recharging points in apartment buildings	X				
Right for individuals who rent an apartment/garage to install recharging points	X				
Right for individuals who own an apartment to install recharging points in apartment buildings	X				

Please comment

The EU needs a just and inclusive transition to e-mobility that gives all Europeans, whether they live in detached homes with off street parking or in apartment buildings, the possibility to reap the benefits of integrating their vehicle with the grid. The 2018 Energy Performance of Buildings Directive (EPBD) is not fit for this purpose.

In view of an ambitious “renovation wave” which integrates different policy priorities, it is mandatory to ensure:

1) Only smart charging infrastructure is installed in both new and renovated residential and commercial buildings, or at least infrastructure that makes buildings ready for smart charging (i.e. ducting & cabling including communication wire and electric protection devices for bidirectional flows of electricity);

2) Smart charging infrastructure in new and refurbished commercial buildings shall be able to communicate with Energy Management Systems in a secure way. Such an Energy Management system should be able to communicate with the grid in order to enable automated flexibility and optimize energy consumption;

3) the right for building occupants (both residential and offices) to use cars in the parking lot as a behind the meter flexibility resource to optimize their own energy.

Interoperability

Technical Specifications

In order to ensure technical interoperability between vehicles/vessels and the infrastructure throughout Europe, the directive already sets certain technical specifications, e.g. with respect to socket outlets at recharging points, and enables the Commission to adopt secondary legislation with respect to technical specifications.

13. Do you believe that further mandatory technical requirements/standards are required to ensure full interoperability of infrastructure and services across Europe?

- Yes
 No
 No opinion

14. If "yes" to the previous question, in which areas would technical requirements/ standards be needed?

- Physical interfaces between vehicles/vessels and the infrastructure
 Identification and authentication of electric vehicles
 E-roaming protocols
 Interface to energy networks and / or building management systems to enable electric vehicles to provide electricity back to the grid
 Communication security
 Others
No opinion

Please explain briefly your answer

At least for any publicly funded infrastructure, open technical standards should be used to prevent vendor lock-in, increase customer choice and lower costs, boost interoperability and cybersecurity. This should apply in particular for cables. While the cables standard for passenger vehicles has been solved by the existing AFID, it remains an issue for buses and large trucks, which should be addressed in the AFID revision.

User Information

15. In your view, should EU legislation ensure that certain information on alternative fuels infrastructure is made available to the user by digital means (e.g. through an app)?

- Yes
 No
 No opinion

16. If you replied yes to the previous question, which information should be provided?

- Location of re-charging/re-fueling points
 Operator of recharging/refueling points
 Opening hours Refueling / recharging prices
 Type of re-charging/re-fueling points (e.g. max. power of a recharging point, installed capacity of a recharging station, available connector type, e.g. CCS)
 Compatibility of re-charging/re-fueling points with the user's engine/car model
 Comparable (e.g. €/100km) refueling / recharging prices of different fuels
 Real Time Availability of recharging/refueling points
 Accessibility for persons with disabilities Other (please specify)

Please specify

17. In your view, should the EU legislation ensure that certain information is made available to the user by physical means?

- Yes
- No
- No opinion

18. If you replied yes to the previous question, which physical means are you referring to?

- Road signs on highways
- Road signs on all streets

Please specify

19. In your view, how often are the prices charged at publicly accessible re-charging points clearly identifiable?

- Always
- Sometimes
- Seldom
- I don't know

20. Currently many different concepts and price components exist to price electric recharging services, e.g. initial fee, time fee, kWh fee, possibly roaming fee. Should there be a harmonization of the display of recharging fees required at EU level?

- Yes
- No
- I don't know

21. In your view, where should information on the refueling/re-charging price be displayed?

- At the refueling/re-charging station
- In every app that provides information on charging infrastructure
- In every vehicle information system
- Other (please specify)

Please specify

Semi Public chargers

Currently the Directive only distinguishes between publicly accessible and non publicly accessible recharging infrastructure (private infrastructure located in apartment buildings or offices). However, some publicly accessible infrastructure is not located on public grounds along roads but on private property, e.g. chargers on supermarket parking lots, hotels or private car parks. It is being debated if such “semi public” infrastructure would need to be defined separately in a revision of the Directive. On that basis “semi public” infrastructure could be exempted from fulfilling some minimum requirements applicable to publicly accessible infrastructure.

22. On the possible exemption of recharging points from certain minimum requirements, to what extent, do you agree with the following statements?

	Strongly agree	Agree	Rather disagree	Strongly disagree	No opinion
Re-charging points that are located on private properties to which access can be restricted by the owner (such as charging points located on supermarket	<input checked="" type="checkbox"/>				

car parks, hotels, etc.) should be exempted from certain minimum requirements					
Recharging points where the recharging service is free of charge should be exempted from certain minimum requirements	X				
All publicly accessible recharging points should fulfil all minimum requirements		X			

Are there any other re-charging points that should be exempted from certain minimum requirements? Please explain.

A private charging point should be exempted from certain minimum requirements to avoid an excessive increase in investment costs for the user. Also charging points offering free charging at semi-public premises should be exempted from certain minimum requirements, but always ensure cybersecurity and interoperability.

23. In case you believe that some recharging points should be exempted from fulfilling some minimum requirements, which requirements should those be?

- Location and other static information
- Availability, and other dynamic information
- Information on re-charging prices
- Ad hoc payment functions
- Interoperability requirements with regards to the physical interface
- Interoperability requirements with regards to communication protocols
- Other (please specify)

Please specify

Ad hoc payment functions and information on re-charging prices should always be a requirements if the charge is not free.

Market Access (e-mobility markets)

24. In your view, are there currently problems that e-mobility service providers face when they want to offer their services on charging points that are operated by a third party?

- Yes
- No
- I don't know

If you answered yes, please explain.

500 character(s) maximum

25. In your view, should policy measures be introduced at the EU level to provide for the following as regards to market access for service providers?

- All e-mobility service providers should be allowed to offer their services at any charge-point free of charge
- All e-mobility service providers should be allowed to offer their services at any charge-point for a fee set by the legislator

- All e-mobility service providers should be allowed to offer their services at any charge-point at a non-discriminatory price set by the charge point operator
- Other measures (please specify)
- No additional regulation required at the EU level
- No opinion

Please specify

The 3rd option should be allowed only for public charging infrastructure financed through public funds or subsidized by public fund.

Integration of electro-mobility into the electricity system

26. In your view, which policy measures listed below are essential to ensure that the efficient integration of electro mobility into the electricity system is possible and fully aligned with the electricity market rules?

- Mandatory requirement for all publicly accessible recharging points (existing and new) to be equipped with smart metering systems
- Mandatory requirement for newly installed publicly accessible recharging points to be equipped with smart metering systems
- Mandatory requirement for newly installed publicly accessible recharging points to have smart charging functionalities, such as the ability to react to price and grid signals, respond to local renewable electricity generation and the ability to be controlled
- Mandatory requirements for charging points not accessible to the public to have smart charging functionalities
- Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable smart charging
- Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable vehicle to grid services
- Ensure that necessary battery data is available to authorized third parties for the provision of smart charging services and vehicle to grid services
- None
- Other (please specify)

Please specify

Impacts

[The Inception Impact Assessment](#) discusses possible impacts of potential measures for the review of this Directive.

Those measures relate to a) expanding the scope of the directive to other transport modes, b) strengthening requirements on Member States to ensure the deployment of an adequate number of recharging and refuelling stations and c) ensuring user friendliness and interoperability. Please indicate your view on the impact of such measures aimed at accelerating the deployment of interoperable infrastructure and the uptake of alternative fuels in the following questions.

27. To what extent do you agree with the following statements on the likely economic impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to growth and jobs in in the production of vehicles/vessels and manufacturers of alternative fuels infrastructure	X				
They will contribute to a bigger market in the EU for alternative fuels	X				
They will improve international competitiveness of European industry	X				
They will have a positive impact on research and innovation		X			
They will initially put a strain on investment budgets of citizens and transport operators due to higher purchase cost of alternatively fuelled vehicles			X		
They will reduce overall expenditures of citizens and transport operators due to low maintenance cost and over time reduced investment cost	X				

28. To what extent do you agree to the following statements on environmental impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to less emissions of CO ₂ from vehicle/vessel fleets	X				
They will lead to less emissions of air pollutants from vehicle/vessel fleets	X				
They will have positive effects on human health	X				

29. To what extent do you agree to the following statements on administrative burden and simplification?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
Expanding the scope of the Directive will lead to an increased administrative burden				X	
Replacing the National Policy Frameworks with mandatory targets will increase administrative burden				X	
Introducing more detailed requirements on interoperability and user information will increase administrative burden				X	

30. Do you have any comment on other potential impacts (not mentioned above) of the possible policy measures?

Relevance of other action at European level

31. To what extent do you agree with following statements?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
The objectives of the revision of the Directive could be better accomplished through deployment of non-legislative tools based on guidance or recommendations by the Commission				X	
The objectives could be achieved better if policy measures discussed for the revision of the Directive were implemented through an Alternative Fuels Infrastructure Regulation that would replace the current Directive	X				

Please explain your answer.

A Regulation would ensure a less inconsistent implementation across Member States and contribute to creating a harmonized e-mobility market. This could also allow the EU to expand the scope and better address key segments of charging, in particular in new and existing buildings, commercial properties.

Final remarks

32. Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

You may also want to upload some supporting documents

smartEn documents to upload:

- "E-mobility as an energy resource" (https://smarten.eu/wp-content/uploads/2020/02/smartEn-e-mobility-publication-2020_for-web.pdf)
- White Paper "Making electric vehicles integral parts of the power system" (<https://smarten.eu/wp-content/uploads/2019/07/FINAL-smartEn-White-Paper-E-Mobility.pdf>)
- Summary E-mobility workshop (September 2019)