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EV100 response to the European Commission Consultation on the Review of AFIR

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1. Introduction

About EV100

EV100 is a global initiative bringing together 100 companies committed to accelerating the transition to electric road transport. EV100 members collectively operate some of Europe's largest corporate vehicle fleets and are among the leading purchasers and operators of electric vehicles across light-duty and heavy-duty segments. Since 2017, they have deployed over 400,000 battery EVs and installed over 48,000 charging units worldwide.

EV100 members have made substantial commitments to electrify their fleets and invest in charging infrastructure. The success of these commitments depends on a policy framework that provides certainty for investment, supports rapid infrastructure deployment, ensures interoperability, and delivers a positive user experience for drivers and fleet operators.

Why EV100 is participating in this consultation

The Alternative Fuels Infrastructure Regulation (AFIR) is a cornerstone of Europe's transport decarbonisation framework. AFIR provides the infrastructure backbone needed to support the transition to zero-emission vehicles and complements vehicle-side policies such as CO_2 standards and national electrification strategies.

EV100 supports the objectives of AFIR and considers the Regulation an essential instrument for delivering a coherent European charging ecosystem. The review should focus on refining targets, strengthening implementation, improving user

experience and ensuring infrastructure deployment remains aligned with the pace of vehicle electrification.

2. Key recommendations

2.1 Charging infrastructure deployment targets

Light-duty vehicles

The Regulation has already helped provide investment certainty and clear market signals for infrastructure deployment.

The priority for the review should therefore be effective implementation rather than a significant redesign of the target-setting framework. Frequent changes to the underlying architecture risk undermining investor confidence at a time when charging operators, vehicle manufacturers and fleet operators require long-term regulatory certainty.

Heavy-duty vehicles

For heavy-duty vehicles, the situation is more complex. AFIR has established an important framework for deployment, but experience since adoption suggests that some refinements may be necessary to reflect the operational realities of freight transport.

Charging infrastructure for HDVs must support a wide range of use cases, including long-haul operations, urban logistics, depot charging and intermodal freight operations. While TEN-T corridor deployment remains essential, future revisions should also consider the role of urban nodes, ports, logistics hubs and freight terminals.

EV100 members increasingly identify depot charging as the primary charging solution for commercial fleets. Public charging infrastructure remains essential, particularly for long-distance operations, but public infrastructure alone will not enable the full transition of freight transport.

Our main recommendations are:

- Maintain overall AFIR ambition and avoid weakening existing deployment targets.
- Include targets for HDV charging at urban nodes, ports, logistics hubs and freight terminals.
- Focus on accelerating deployment through faster permitting, improved concession processes and stronger implementation of Member State obligations.
- Expand funding mechanisms, including the Alternative Fuels Infrastructure Facility (AFIF), and broaden eligibility to cover grid connection costs, smart charging technologies and depot electrification where appropriate.
- Consider minimum deployment requirements for Megawatt Charging Systems (MCS) where justified by freight demand.

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2.2 Price transparency

EV100 members generally do not view charging prices themselves as the primary challenge, though blocking and roaming fees are sometimes considered to be excessive. Instead, concerns relate to transparency, predictability and consumer understanding.

Drivers and fleet operators should be able to understand charging costs before initiating a charging session regardless of whether charging is accessed directly or through a mobility service provider. They should also have access to time-based price signals that allow them to make use of smart charging capabilities mandated by AFIR. These price signals are critical to unlocking the business case for charging services and lowering total cost of ownership (TCO) via electrification for fleets.

The review should therefore focus on improving transparency and competition rather than introducing direct price regulation.

Our main recommendations are:

- Improve transparency of charging prices especially roaming charges and additional fees.
- Encourage smart charging and time-of-use pricing that reflects electricity system conditions.

2.3 User experience

The next phase of AFIR should focus not only on deploying infrastructure and ensuring fair and transparent pricing but also on ensuring that infrastructure is easy, reliable and intuitive to use. As EV adoption increases, the quality of the charging will become critical to ensure a seamless EV driving experience.

Users should be able to locate, access and pay for charging services seamlessly across the European Union. This requires reliable infrastructure, transparent information, interoperable systems and consistent implementation of technical standards.

For fleet operators and freight users, operational certainty is particularly important. Reliable charger availability, accurate information on charging performance and the ability to access charging services across networks are increasingly important as electric fleets scale.

Our main recommendations are:

- Require card payment functionality across publicly accessible charging infrastructure for LDVs.
- Strengthen compliance frameworks and certification schemes for AFIR technical requirements.
- Promote common technical standards and interoperability protocols to avoid stranded assets and support cross-border charging services.

- Improve harmonisation of National Access Points and reduce unnecessary national divergence in data requirements.
- Strengthen coordination between National Access Points, the Common European Access Point and existing EU initiatives to create a more coherent European data ecosystem.
- Establish stronger rules (including forced removal) and higher fines in case of charging space occupancy by combustion vehicles and/or unplugged EVs.

2.4 Implementation and integration with the electricity system

Robust reporting and monitoring are essential to understanding infrastructure deployment progress and identifying emerging barriers.

However, the largest risk to successful AFIR implementation increasingly lies not in charging technology itself but in electricity network readiness.

Many charging projects face delays due to permitting processes, grid connection timelines and insufficient coordination between transport planning and energy system planning. These issues are particularly acute for HDV charging infrastructure, where power requirements are substantial.

Our main recommendations are:

- Strengthen implementation of National Policy Frameworks (NPFs) and ensure timely publication.
- Consider measures to enhance monitoring and assessment by the Commission.
- Encourage streamlined permitting and grid connection processes, as detailed in the guidance documents of the Grids Package.
- Encourage flexible connection agreements where possible for HDV charging sites.
- Strengthen coordination between transport and electricity planning, for example by requiring NPFs to be shared with distribution grid operators.