



Brussels, 8 October 2026

Joint letter on the Alternative Fuels Infrastructure Regulation (AFIR) review: Delivering a complete charging ecosystem for heavy-duty vehicles

Dear Executive Vice-President Ribera,

Dear Commissioner Tzitzikostas,

As the Commission prepares the AFIR review, we call on the review to establish an EU framework for semi-private charging, alongside public and private charging.

A substantial share of truck charging is expected to take place at operators' depots and destinations, where charging can be integrated into daily operations. Depot charging allows operators to cover most of their energy needs, optimise their total cost of ownership, and reduce dependence on public networks.

At the same time, depot charging alone is not enough. Trucks operate beyond their home base, requiring access to charging throughout their journeys. Moreover, many smaller operators do not have the scale, space, grid capacity or investment capacity for sufficient charging infrastructure at their premises.

Public charging infrastructure, particularly along the TEN-T network, will also remain essential. But there is an opportunity that the current framework does not fully recognise: semi-private business-to-business charging infrastructure.

A distinct category

Transport operators, logistics companies, shippers and others with charging infrastructure in their depots, warehouses, logistics hubs, passenger terminals, and loading/unloading locations could voluntarily make part of their capacity available to other operators. Larger companies, for example, could make their ecosystem available to subcontractors and smaller operators.

This infrastructure cannot be treated like a fully public charging station. For transport and logistics companies, providing charging services to third parties will generally not become their main business. Their infrastructure will mainly support their own operations, and they must retain appropriate control over access and the prioritisation of their own fleets and operations.

The EU regulatory framework should therefore recognise semi-private charging as a distinct category, with proportionate and flexible conditions that allow operators to make part of their capacity available without turning them into public charging providers.

The semi-private category should be reflected in the relevant EU State aid rules, namely the General Block Exemption Regulation (GBER), to ensure that it does not create disproportionate administrative or compliance requirements or reduce previously granted financial support. The GBER revision offers Member States the opportunity to adopt a coherent and proportionate approach to supporting semi-private infrastructure.

Complementarity and SME access

Semi-private infrastructure will be particularly valuable for SMEs. Larger operators may have greater capacity to invest in depot infrastructure, and opening part of it to subcontractors and other operators could allow smaller companies to benefit from accessing infrastructure they might be unable to develop themselves.

It would also complement the public charging network, providing more capacity at strategic transport sites, particularly around depots and logistics hubs. As zero-emission truck fleets grow, demand for both will increase. **Public, private and semi-private infrastructure should thus be developed as mutually reinforcing parts of one charging ecosystem.**

Against this background, we call on the Commission, in the context of the AFIR review and related EU instruments, to establish a framework which:

- introduces a separate EU category for semi-private charging with minimum criteria as part of the upcoming AFIR revision that provides proportionate conditions for voluntary third-party access while allowing infrastructure owners to retain control over their operations,
- provides in AFIR legal clarifications that prevent logistics companies that voluntarily share charging infrastructure from being treated by default as a CPO or an electricity supplier,
- removes barriers related to permitting and grid connections, which can trigger burdensome and disproportionate regulatory requirements,
- integrates private and semi-private charging at depots, hubs and loading sites into national infrastructure, energy and grid plans,
- ensures that making charging capacity available to third parties can be done under simple, predictable and proportionate conditions, so bureaucracy does not discourage operators from participating,
- enables semi-private infrastructure to benefit from appropriate EU and national funding and State aid support, and
- gives guidance on funding schemes and on the implementation of RED III and GHG quota rules so they include semi-private depot charging in their schemes and recognise additional benefits where renewable electricity is used.

The objective should be to foster the conditions and incentives for private investment to contribute more effectively to Europe's overall charging capacity, without imposing new deployment or access obligations on transport operators.

Recognising semi-private charging as a distinct category at EU level would be a pragmatic step towards accelerating infrastructure deployment and supporting the scale-up of zero-emission heavy-duty vehicles among operators of all sizes.

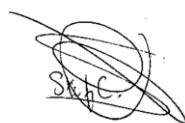
Yours sincerely,

Raluca Marian



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